BRIDGE POINT UPLAND PROJECT
INITIAL STUDY/ MITIGATED NEGATIVE DECLARATION
SCH 2019129066

VOLUME III
RESPONSES TO COMMENTS, SUPPLEMENMTAL INFORMATION, AND MITIGATION MONITORING AND REPORTING PROGRAM

Prepared For:

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VOLUME III

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III. Mitigation Monitoring and Reporting Program

I. Responses to Comments

Responses to Comments

This document includes a reproduction of, and responses to, comments received during the Draft IS/MND public review period. Comments are presented in their original format (attached), along with annotations that identify each comment letter.

Responses to those individual comments are provided in this document alongside the text of each corresponding comment. Responses are categorized by:

- State Agencies
- Regional Agencies
- Local Agencies, including oral comments from City of Upland Commissioners and Councilmembers from January 9 Joint Workshop
- Individuals including public testimony from January 9 Joint Workshop

Where the same comment has been made more than once, a response may direct the reader to an earlier numbered comment and response so as to avoid repetition. Where a response requires revisions to the Draft IS/MND, the revisions are explained here and shown in Final IS/MND.

Additionally, since publication of the IS/MND, the environmental document has been further updated and refined as part of extremely comprehensive and detailed responses to comments. The list of supplemental attachments is below:

List of Attachments

- Attachment A: Comment Letters Received
- Attachment 1: Peer Review of Greenhouse Gas Technical Report For The Bridge Upland Project Upland, California
- Attachment 2: Supplemental GHG Analysis for the Bridge Point Upland Project
- Attachment 3: Health Risk Assessment for Bridge Point Upland Project
- Attachment 4: Additional Study Intersections Memo
- Attachment 5: Supplemental Project Field Survey (including peer review by Rocks Biological Consulting)
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State Agencies		
Letter from Department of Fish and Wildlife, dated January 17, 2020		
SA-1	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 burrowing owls and their habitat may be impacted, directly or	The Project site does contain suitable habitat for burrowing owl and therefore, a mitigation measure has been added to the Final IS/MND to conduct pre-construction surveys for burrowing owl before the start of grading activities to confirm the absence of burrowing owl before the start of grading, clearing or grubbing activities to confirm the absence of burrowing owl from the site. MM BIO-2: Prior to the initiation of construction activities, a qualified biologist shall conduct two preconstruction (take avoidance) surveys for burrowing owl: one survey 14 days prior to initiating ground disturbance and one within 24 hours prior to ground disturbance. These survey shall be conducted in accordance with the most current and applicable California Department of Fish and Wildlife (CDFW) protocol (current protocol is 2012 Staff Report on Burrowing Owl Mitigation) to determine whether the burrowing owl is present at the site. Preconstruction surveys shall include suitable burrowing owl habitat within the Project footprint and within 500 feet of the Project footprint (or within an appropriate buffer as required in the most recent guidelines and where legal access to conduct the survey exists). If burrowing owls are not detected during the clearance survey, no additional mitigation is required. 1. If burrowing owl is located, occupied burrowing owl burrows shall not be disturbed during the nesting season (February 1 through August 31) unless a qualified biologist verifies through non-invasive methods that either the birds have not begun egg-laying and incubation or that juveniles from the occurred burrows are foraging independently and capable of independent survival. A 500-foot non-disturbance buffer (where no work activities may be conducted) will be maintained between Project activities and nesting burrowing owls during the nesting season, unless otherwise authorized by CDFW. 2. If burrowing owl is detected during the non-breeding season (September 1 through January 31) or confirmed to not be nesting, a 160-

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	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.	foot buffer non-disturbance buffer will be maintained between the Project activities and occupied burrow. Alternatively, a Burrowing Owl Relocation and Mitigation Plan may be prepared and submitted for approval by CDFW. Once approved, the Plan would be implemented to relocate non-breeding burrowing owls from the Project site. The Plan will detail methods and guidance for passive relocation of burrowing owls from the Project site, provide monitoring and management of the replacement burrow sites, reporting requirements, and ensure that a minimum of two suitable, unoccupied burrows are available off site for every burrowing owl or pair of burrowing owls to be passively relocated. Compensatory mitigation of habitat would be required if occupied burrows or territories occur within the permanent impact footprint. Ratios typically include a minimum of 19.5 acres per nesting burrow lost; however, habitat compensation will be approved by CDFW and detailed in the Burrowing Owl Relocation and Mitigation Plan. Suitable burrowing owl habitat conserved pursuant to the Settlement Agreement may be counted toward mitigation for impacts to burrowing owl habitat and would be based upon regulatory agency approval. 3. Construction work may proceed after owls have been excluded from the site following accepted protocol and approval of CDFW, and as approved by the City. Alluvial Fan Sage Scrub (RAFSS) habitat was found on site as noted in the comment. Rocks Biological Consulting conducted a field visit on January 22, 2020 and prepared the Supplemental Project Field Survey Memorandum (included as Attachment 5). As Rocks Biological Consulting noted in its January memorandum, the RAFSS habitat "is highly disturbed by debris piles, off-road vehicle use, and homeless encampments and is further degraded by non-native invasive plant species such as filaree (Erodium sp.), tumbleweed (Salsola tragus), and castor bean (Ricinus communis)." A new mitigation measure has nonetheless been added to the IS/MND to address this habitat. Given the high level of disturbance and impacted quality of the RAFSS habitat, the new mitigation measure requires that the applicant preserve scale broom scrub habitat with equal

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		or better habitat value as the site's habitat at a 0.5:1 mitigation ratio, as follows: MM BIO-3: Prior to the issuance of certificate of occupancy, the project applicant shall submit to the satisfaction of the City Planning Division, evidence that scale broom scrub habitat with equal or better habitat value as the site's habitat has been preserved at a 0.5:1 mitigation (new:existing) ratio at a suitable location where the long-term viability of the habitat can be assured. Satisfactory evidence includes, but is not limited to, evidence that the appropriate amount has been purchased at an approved mitigation bank.
Letter from Governor's Office of Planning and Research, State Clearinghouse and Planning Unit, dated January 21, 2020		
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 CEOA database for submitted comments for use in preparing vour finl environmental document: httss://ceeanet.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	Comment noted. One comment letter related to the Bridge Point Upland Project was found in the CEQA database. This letter from the California Department of Fish and Wildlife, dated January 17, 2020, has been accounted for in this Responses to Comments Matrix as SA-1, above.

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	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.	
Regional Agencies		
Letter from South Coast Air Quality Management District, dated January 21, 2020		
RA-1a	South Coast AQMD Staff's General Comments 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[1]. 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	**Response 1 – Trip Length and HRA** The 20-mile default trip length in CalEEMod is assigned to the construction haul truck trips, and therefore is not applicable to the project's operations. The 6.9-mile distance for operational trips cited by the comment is only one component of the formula that was used to calculate average trip length based on district or county specific data. Three different CalEEMod default distances were included in the model: a 6.9-mile trip length, an 8.4-mile trip length, and a 16.6-mile trip length. When weighted according to the CalEEMod default trip type distribution and methodology, the average primary trip length in the project's analysis is actually 12.6 miles for the warehouse land use. Furthermore, these are one-way trip lengths and the round-trip length used in the model is 25.2 miles. Based on the approach used to generate the emission inventory, the weighted average trip length is the appropriate consideration of what delivery vehicle trip length was analyzed in the IS/MND. Further, the Project is a last mile warehouse that would be the final point of storage before distribution of goods to customers' doorsteps. Research conducted for newly-opened last mile facilities warehouse indicates that trip lengths are typically between 6 to 9 miles from the population centers they serve. This suggests that the average primary trip length of 12.6 miles used for the Project, based on CalEEMod, is reasonable and conservative, i.e. may overestimate the actual delivery trip length.

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

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	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). *Air Quality Impact Analysis – Operational Mobile Source Emissions* 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[2]. 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). <u>Mobile Source Health Risk Assessment (HRA) Analysis</u>	Finally, the estimated trip length assumed in the IS/MND likely results in a significant overestimation of the new vehicle miles actually resulting from the Project because it assumes that all trips to and from the Project are "new", rather than replacement or redistribution of trips that already exist. For example, the Project would be delivering packages that, primarily, would already be traveling to people's homes on trucks and vehicles, but from farther distances than this Project's proposed last-mile facility. Current deliveries to the Project area likely occur from the next closest e-commerce facilities in Los Angeles or Chino, resulting in longer trip lengths without the Project. Therefore, the Project would largely be replacing and reducing existing trips, and associated greenhouse gas and air quality emissions. Therefore, no changes are required the IS/MND's air quality analysis as a result of the analyzed project trip length. Additionally, the typically SCAQMD recommends that Health Risk Assessments (HRAs) be conducted for projects that would generate substantial sources of diesel particulate matter (DPM) (e.g., truck stops and warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units). The proposed project is a last-mile non-refrigerated warehouse that would only generate a maximum of 25 trucks (50 truck trips) per day, which would be enforced as part of the project's conditions of approval. The closest sensitive receptors would also be located more than 1,000 feet from the project site. No HRA is warranted as the Project is consistent with the recommendations regarding the siting of new sensitive land uses near potential sources of TAC emissions provided in the SCAQMD Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. Specifically, the Project is not considered to be a substantial source of diesel particulate matter warranting an HRA, since daily truck trips to the Project Site would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units.

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

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	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[3]. 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[4] in the Final MND and compare the results to South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk[5]; 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	Although an HRA is not required for the project, in response to the comment requesting one, an HRA was performed as described in accordance with SCAQMD and the California Office of Environmental Health Hazard Assessment (OEHHA) guidelines; refer to Attachment 3. As described in the HRA, cancer risk would be 1.92 in a million, which is below the SCAQMD threshold of 10 in one million and impacts would be less than significant. Additionally, non-carcinogenic hazards are calculated to be within acceptable limits. Therefore, impacts related to health risk from the Project would be less than significant. **Response 2 – Conclusion** The comment identifies CEQA Guidelines Section 15074 which requires lead agencies to consider the IS/MND together with comments received during the public review process. The SCAQMD also requests written responses to the comment letter. The City of Upland will fully comply with the requirements of CEQA Guidelines Section 15074 as requested in the comment. **Responses to Attachments** Response 3 – Air Quality Impact Analysis – Operational Mobile Source Emissions Refer to Response 2, above. As noted above, the 6.9-mile distance for operational trips is only one component of the formula that is used to calculate average trip length based on district or county specific data. The average trip length used in the analysis was 12.6 miles each way and appropriately represent the Project. As noted, these are one-way trip lengths and the round-trip length used in the model is 25.2 miles. The 20-

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

[4] 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.

[5] 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.

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	MND. *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[6]. *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[7]. 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	mile default trip length in CalEEMod is assigned to the construction haul truck trips and not operational trips. **Response 4 – Mobile Source Health Risk Assessment (HRA) Analysis** Refer to Response 2, above. As noted above, the Project is not anticipated to generate a substantial source of DPM based on SCAQMD screening guidance. The closest sensitive receptors would also be located more than 1,000 feet from the project site. Therefore, an HRA is not required. However, in response to the comment and in the interest of full disclosure, an HRA was performed in accordance with SCAQMD and the California Office of Environmental Health Hazard Assessment (OEHHA) guidelines; refer to Attachment 3. As described in the HRA, cancer risk would be 1.92 in a million, which is below the SCAQMD threshold of 10 in one million and impacts would be less than significant. Additionally, non-carcinogenic hazards are calculated to be within acceptable limits. Therefore, impacts related to health risk from the Project would be less than significant. **Response 5 – Recommended Changes to Mitigation Measures Air Quality (AQ)-2 and 3** As noted above, the project's air quality and health risk analyses have been conducted consistent with SCAQMD guidance and methodologies. The Project's emissions have been demonstrated to be below the SCAQMD's thresholds and associated impacts were found to be less than significant. The commenter recommends additional mitigation measures, but mitigation measures are only required to avoid potentially significant impacts per State CEQA Guidelines Sections 15041, 15071, and 15126.4(a)(3). Specifically, CEQA Guidelines Section 15041(a) requires mitigation to substantially lessen or avoid significant effects on the environment consistent with applicable constitutional requirements such as the "nexus" and "rough proportionality" standards established by case law.

[6] South Coast AQMD. Rule 1113 – Architectural Coatings. Accessed at: http://www.aqmd.gov/docs/default-source/rule- book/reg-xi/r1113.pdf.
[7] MND. Page 4.

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	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. <u>Additional Recommended Mitigation Measures</u> 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[8].	Nonetheless, the project applicant agrees to incorporate and add almost all of the measures recommended by the SCAQMD as noted below.
RA-1b	*Mitigation Measures Construction Air Quality Impacts* 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	PDF-AQ-1 has been added to the MMRP as follows: "Off-road diesel-powered construction equipment greater than 50 horsepower shall meet USEPA Tier 4 off-road emission standards. This requirement shall be included in applicable contractor contracts, and 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."

[8] South Coast AQMD. Accessed at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook.

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	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.	This mitigation measure has been added to the project's MMRP as PDF-AQ-2 as follows: "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."
RA-1d	*Mitigation Measures for Operational Air Quality Impacts from Mobile Sources* 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).	The Applicant has agreed to enforceable Conditions of Approval that would limit the Project trucks to a maximum of 5 during the daytime, and 25 in total per day.
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	The project site is more than 50 acres in size, with the project building and truck court located more than 700 feet from the closest public street,

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	queuing outside of the facility.	Foothill Boulevard. No truck gates are proposed in close proximity to the public street, and the project building occupies only 10% of the project site area, with parking and landscaping occupying the rest of the site. As a result, there will be no truck queuing on the public street outside of the project property.
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.	No repair is proposed as part of the project, and there are no sensitive receptors within 1,000 feet of the project site.
RA-1g	*Mitigation Measures for Operational Air Quality Impacts from Area Sources* 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.	PDF-GHG-1 has been added to the Project's MMRP as follows: "The Project shall stall 0.75 MW of rooftop solar; this equates to approximately 55,000 square feet of roof space however the total square footage may vary provided that 0.75 MW of power is achieved." As a result of this new solar commitment, the project building is projected to have net-zero electricity consumption. The following Project Design Features have also been added to the MMRP: • PDF-GHG-2: The Project shall provide 30 electric vehicle (EV) charging stations to service 30 parking spaces. • PDF-GHG-3: The Project shall provide the following EV-ready spaces, i.e. install, at a minimum, conduits for future plug-in of EV chargers; providing EV-ready spaces allows installation of the latest technology chargers at the time that electric delivery vans and trucks become operational, rather than installing charging stations immediately that become obsolete at the time that electric vans and trucks become used: o 50% of auto stalls, including 100% of ADA stalls o 100% of van parking stalls o 100% of trailer parking stalls o 100% of dock doors o 100% of van positions at van loading areas at north and south sides of the building

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RA-1h	e) Require the use of electric landscaping equipment, such as lawn mowers and leaf blowers.	The following PDFs have been added to the MMRP: • PDF-GHG-5: The Project shall use all electric powered forklifts. • PDF-GHG-6: Electric landscaping equipment, such as lawn mowers and leaf blowers, shall be used on-site.
RA-1i	f) Maximize the planting of trees in landscaping and parking lots.	The following PDF has been added to the MMRP: • PDF-GHG-4: The Project shall include 1,000 trees throughout the parking lot and landscaped areas around the Project site. Additionally, the project includes approximately 11 acres of landscaping on site.
RA-1j	g) Use light colored paving and roofing materials.	As noted above, solar panels will be included on the project's roof. Additionally, the project will be using concrete, which is more reflective than traditional asphalt.
RA-1k	h) Utilize only Energy Star heating, cooling, and lighting devices, and appliances.	The Project shall comply with this measure.
RA1-l	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 acres17 (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 Operations18. 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 class19. 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	The Project would be required to comply with all applicable SCAQMD rules and regulations, including Rule 403(e). The IS/MND notes that project compliance with SCAQMD Rule 403 is required for construction activities (page 18). Compliance with Rule 403 includes compliance with all applicable aspects of the rule, including the Rule 403(e) subdivision. Subdivision (e) requires 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.

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	reduce regional and localized emissions from particulate matters during construction.	
Local Agencies		
Comments LA-1 through LA-27 below are oral comments made by the City of Upland Planning Commission and City Council at the January 9, 2020, Joint Workshop		
Commission Chair Aspinall		
LA-1	Do you have any intention prior to making comments based on what you get in writing, the comments you get in writing to respond to any of the accusations of inaccuracy or inadequacy in your studies? You would do that through the comment process?	The responses to comments (this document) will include responses to all comments provided during the comment period, both written comments and oral comments made by the community members, the Planning Commission, and the City council at the Joint Workshop held January 9, 2020.
Commission Chair Aspinall		
LA-2	So we need to go back to the map of the project. You'll recall in the northwest corners that's kind of lobbed off, there's soft of a -- if you -- if you look at your sort of map of the project. Yeah, it looks like it overlaps the runway, I'm not sure. Is that intentionally done because it's in the zone? Do you know which one?	As noted, a portion of the Project parcel located in the northwest corner of the site is not usable due to its proximity to the airport. In addition to being located in the C1 zone of the ALUCP, that portion of the site presents a grading challenge that could require the incorporation of a retaining wall. Utilizing this portion of the site is not necessary for the proposed Project and will be left vacant and is not part of the proposed development project plan.
Commissioner Anderson		
LA-3	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?	The applicant is open to considering porous reflective pavement for the site, however this type of material often breaks down and deteriorates faster than traditional concrete. Concrete is also more reflective than asphalt, therefore the Project's use of concrete will help reduce surface temperatures over traditional asphalt. Additionally, the new impervious paving on site would drain to underground infiltration retention systems, which would retain and treat water prior to discharging into the public storm drain system. Therefore,

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		due to the onsite subterranean infiltration and direction of flows to allow for groundwater recharge, the proposed Project would not significantly impact local groundwater recharge or impede sustainable groundwater management of the basin.
Commission Chair Aspinall		
LA-4	[Referencing airport grading] So will that require a lot of readjustment? I think it said it will be deeded to the airport, but you're not the owner so --	The northeast corner of the site is not being deeded to the airport, however it is not being redeveloped as part of the proposed Project site.
Councilmember Elliott		
LA-5	First of all, there's a lot of us that are new sitting up here and, first of all, this is the largest development project that I have ever made any decisions on and I would really like some -- probably from some staff -- some -- some clarification of this process. So you're saying that the public hearing is going to be held in February -- I believe it was February 12th, is that correct, that's in front of the Planning Commission?	The Planning Commission public hearing is currently scheduled to take place on February 12, 2020.
Councilmember Elliott		
LA-6	And that public hearing is for the Planning Commission to hear what the public wants and has to say with regard to the decision that they will be making on the mitigated negative declaration; is that correct? But as far as accepting the mitigated negative declaration, one of the decisions --	The Planning Commission will be a recommending body on the Project's entitlements (including the Development Agreement, site plan review, design review, lot line adjustment, and airport compatibility findings) and adoption of the proposed IS/MND. The City Council will be the ultimate decisionmaker on the Project's entitlements and adoption (or not) of the IS/MND.
Councilmember Elliott		
LA-7	Then the other questions I have, and I have a whole -- I have like four pages of them, I'm not going to go through all of them, but some of these are the ones that may have been posed that -- that have been posed to me most	The IS/MND was prepared by Kimley Horn, an independent, third-party environmental consultant that routinely prepares CEQA documents on behalf of cities throughout Southern California and the Inland Empire,

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	frequently from the residents and you started out Commissioner Aspinall about the -- some cities require that the City contract with for the studies and the developer pay, some have the developer pay in contract and those studies are peer reviewed, and some of them just let the developer contract with the consultants and then there's no peer review. Where do we fall in Upland?	including previously for the City of Upland. While the applicant is required to pay Kimley Horn's fees, so that the cost of preparation of the CEQA document is not borne by the public, the environmental document produced by Kimley Horn is independent of the applicant. This is entirely consistent with Section 15063 of the CEQA Guidelines. Further, the Project's IS/MND has been subject to multiple peer reviews. A peer review was conducted of the GHG analysis included in the IS/MND by Ramboll, a leading engineering, design and consultancy company which helped develop the South Coast Air Quality Management District's (SCAQMD) preferred GHG emissions model, CalEEMod®, used to develop the GHG emissions inventory for the Project. This peer review memorandum, included as Attachment 1, confirmed that the IS/MND's GHG analysis was prepared using the most-recent, agency-recommended model consistent with SCAQMD guidance and industry standards for estimating GHG emissions and environmental impacts under CEQA. Ramboll's peer review concluded that the IS/MND correctly determined that the Project's GHG emissions would be less than significant. Additionally, while the IS/MND did not identify a significant GHG impact, the project has committed to further reducing GHG emissions through a number of new measures, including installation of solar panels on the building roof, EV chargers for 30 parking spaces, and EV-ready infrastructure for all trucks, all vans, and 50% of car parking spaces, among other measures. As a result of this new solar commitment, the project building is projected to have **net-zero electricity consumption**. These additional sustainability commitments are described in the Supplemental GHG Analysis, included as Attachment 2. As calculated therein, the project's GHG emissions would continue to be below the significance threshold identified in the MND of 10,000 MT CO2e per year, and would also now be below 3,000 metric tons of CO2e per year even if that threshold were applicable. This supplemental GHG analysis, including these additional sustainability commitments, was also peer reviewed and confirmed by Ramboll, as noted in their memo. The traffic analysis prepared by Translutions included in the Draft IS/MND was peer reviewed by both Gibson Transportation and TKE Engineering.

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		Therefore the traffic study included in the Draft IS/MND is the product of analysis and comments from three independent traffic engineering firms. Further, Rocks Biological Consulting conducted an additional site visit and provided an independent, third-party review of the findings of the habitat assessment. The Supplemental Project Field Survey provided by Rocks Biological Consulting and included as Attachment 5, concurs that there is no potential for federally or state-listed as threatened or endangered plant or wildlife species to occur on the project site. Finally, the Draft IS/MND as a whole was peer reviewed by the City's own Planning staff (with accumulated decades of CEQA experience), Engineering staff, and City Attorney. This review process led to changes and refinements to the IS/MND before its publication for public review.
Councilmember Elliott		
LA-8	And the staff will review it and determine whether or not some of the studies need to be altered or redone, based on some of the feedback we've heard; is that correct?	City Planning staff, Engineering staff, the City Attorney, and TKE (the City's additional peer review traffic consultant) all reviewed the IS/MND and all technical appendices prior to publication. Suggestions were made and the document and technical appendices were revised to incorporate those requested revisions. City planning staff is satisfied that the IS/MND and the technical appendices represent the independent judgment of the City. Additionally, since publication of the IS/MND, the environmental document has been further updated and refined as part of extremely comprehensive and detailed responses to comments (this document). For instance, five new sustainability commitments were added to the project as new Project Design Features GHG-1 through GHG-5. As a result of these measures, the project building is projected to have **net-zero electricity consumption**. Additional intersections were analyzed in response to comments which confirmed the traffic study's less than significant impact conclusions at all potentially impacted intersections. A Health Risk Assessment was completed for the project which confirmed that health risk would be well below AQMD-established health-protective levels. Minor errors were corrected in the hydrology analysis which did not change any of the IS/MND's hydrology conclusions, and a landscape plan

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		was added to the IS/MND. As a result of this very thorough responses to comments documents, the following documents have been added to the IS/MND: • Attachment 1: Peer Review of Greenhouse Gas Technical Report For The Bridge Upland Project Upland, California • Attachment 2: Supplemental GHG Analysis for the Bridge Point Upland Project • Attachment 3: Health Risk Assessment for Bridge Point Upland Project • Attachment 4: Additional Study Intersections Memo • Attachment 5: Supplemental Project Field Survey (including peer review by Rocks Biological Consulting) • Attachment 6: Updated Hydrology Report • Attachment 7: Landscape Plan • Attachment 8: Oct. 9, 2019 CalEEMod AQ/GHG Calculations Consistent with IS/MND
Councilmember Elliott		
LA-9	So I spoke with many of the people who came here tonight and I met with them at various places and -- about the technical studies and I don't want to take any time up here to go over them, but I'd like to meet with you, Mr. Dalquest, with these questions and see if perhaps we can iron them out. One of my big concerns is with regard to the ambiguity of the classic -- the land use classification per the Upland Municipal Code; so that this project is deemed to be appropriate meets the commercial designation, so that it is allowable to have warehouses. And that was around administrative decision because that's written in our code. But the term "warehouse" is extremely ambiguous nowadays, as we heard	The request for potential future clarifying updates to the Municipal Code is noted for Planning staff. The comment does not raise any issues or address the adequacy of the IS/MND. The Project is a warehouse facility consistent with Section 17.51.010 of the City's Municipal Code which Code defines warehousing as the provision of facilities used primarily for the storage of commercial goods, including documents. The Project is located within the C/I-MU zone, and Section 17.05.020 of the City's Municipal Code which identifies warehousing as a permitted use within the C/I-MU zone. The General Plan is consistent with the Municipal Code and identifies that warehousing is an allowable use within the C/I-MU zone. The project is

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	from knowledgeable members of our audience that since that was adopted it has changed. And so I'd like to direct staff to consider and research options to update our Upland Municipal Code for future projects on this, so that we can have, say, a -- a different level of administration and decision making based on if a warehouse is under 50,000 feet, perhaps that could be just an administrative review for a warehouse is over 50,000 feet they would require a conditional use permit. And then I'd also like staff to look at clarifying the distinction between a warehouse and a distribution center and require a conditional use permit for all distribution centers over 50,000 square feet. Does that make sense? I have it all written down and I can sense that to you, I'd like to make this really clear for future projects because this is extremely ambiguous in our municipal code and I want to avoid any future problems with this.	also consistent the General Plan's description of the C/I-MU zone as follows: "The Commercial/Industrial Mixed-Use designation is **designed to accommodate a variety of industrial** and regional retail uses and to support commercial activities to satisfy a range of shopping needs for residents of the community. **It is also intended to encourage development of business in the City and to maximize the potential for job generation.** Uses supported under this category include commercial and industrial. **Typical industrial uses could include limited general industrial, manufacturing, assembly, warehousing, multi-tenant industrial, research and development, and airport–related uses**. Typical commercial uses include retail commercial and durable sales goods, tourist-related commercial, entertainment, recreational uses, administrative and professional offices, commercial activities, business support services, food and institutional uses, as well as residential, subject to a reasonable minimum increment of land area as well as a special use permit process." (emphasis added) The project is also consistent with the following General Plan policy of the City: "Policy LU-3.2 Economic Revitalization. Promote the development of vacant and underutilized parcels with higher intensity commercial and industrial land uses." Additionally, while there have been some assertions that the project is a truck terminal, the project does not in any way fit that definition, and is correctly categorized as a warehouse. The US government defines types of businesses by Standard Industrial Classification (SIC). The proposed project fits squarely within Industry Group 422 (Public Warehousing and Storage) and Industry Group SIC Code 4225 – General Warehousing and Storage. The project does not fit within the SIC Industry Group 423 (Terminal and Joint Terminal Maintenance) or Industry Group 421, both of which include terminals operated by motor freight transportation companies. In addition, the ULI publication "Guide to Classifying Industrial Property" available online here:

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		http://courses.washington.edu/cee320ag/warehousing/WarehouseClassification.pdf describes truck terminals as follows: "***Truck Terminals do not warehouse goods. Their sole function is to transfer goods from one truck to another***. Because of this function Truck Terminals are long and narrow in design. Because Truck Terminals transfer rather than store cargo, the facilities also have low ceiling heights. ***Most ceiling heights range from 12 to 16 feet, which is below the height of any facilities within the Warehouse Distribution category***." (emphasis added) The proposed project does not fit this definition of a truck terminal. The proposed project's warehouse will be used to sort, store and then distribute goods directly to customers on vans. No goods will be transferred from one truck to another truck at the project's warehouse, for delivery to the next warehouse in the supply chain, as is the case for a truck terminal. Further, the proposed project's ceiling height is 36 feet, well above the 12 to 16 foot range that is typical for a truck terminal. The project's 36 foot ceiling height is very typical of warehouses that are required to store goods on site in order to optimize storage capacity. The low, 12-16 foot ceiling height works for truck terminals because goods are immediately transferred from one truck to another, without storage. Therefore, the proposed project's warehouse fits neither the operational nor the physical characteristics of a truck terminal.
Councilmember Elliott		
LA-10	Will the airport be used at all for distribution? Will the airport at all be used for distributing in anyways in the projected future?	The Project does not propose connectivity of any kind, including distribution, with the adjacent Cable Airport. All deliveries to the Project would be from the 25 trucks identified in the IS/MND. Any future operation on the Project site would be subject to all mitigation measures, conditions of approval and commitments contained in the Development Agreement that are approved with the proposed Project; therefore distribution to or from Cable Airport could be limited through a condition of approval if desired by the decisionmakers. Any future use on the Project site would be required to comply with the uses approved for the site.

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Councilmember Elliott		
LA-11	And what about drone projects, are those protected at all in the future?	The proposed Project does not include drone activity, which would be incompatible with the adjacent airport use. Any future operations inconsistent with the Project analyzed in this IS/MND would be subject to separate environmental analysis.
Councilmember Elliott		
LA-12	I 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 bigger than say cape myrtle. 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 writing.	A landscape plan identifying all of the native plants and 1,000 trees to be planted on site was provided with the Project applications and has been added to the Final IS/MND as Attachment 7.
Councilmember Elliott		
LA-13	I think that a lot of the other concerns 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 night. And that can all be in writing so that if, in fact, there was a violation we would come back and exact some kind of a financial or some kind of a penalty to -- to -- for these kinds of violations.	Agreed. Any future operator of the Project site would be subject to all of the mitigation measures, conditions of approval and commitments contained in the Development Agreement approved for the Project. Any future operator would be required to comply with the uses approved for the site, and operate in consistency with the environmental analysis in the IS/MND. Additionally, the Applicant has agreed to enforceable Conditions of Approval that would limit the Project trucks to a maximum of 5 during the daytime, and 25 in total per day.
Councilmember Elliott		
LA-14	Yeah. And I think there seems to be lot of paranoia but I think you have to understand you're not revealing the tenant and so we can't do our due	The CEQA Guidelines provide that analysis is based on the operational and construction related environmental impacts of a project and does not

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	diligence as far as researching what this tenant's employment history is and anything to everybody is kind of wondering here now what's going on.	consider the owner or prospective tenant in that analysis. The scope of the City's Municipal Code does not provide authority for the City to determine or review the choice of tenant that may occupy the building. *Friends of Davis v. City of Davis* (2000) 83 Cal.App.4th 1004, 1013-14. Further, no tenant has signed a lease to operate the Project at this time. However, while the tenant has not been determined at this time, any future operator of the Project would be required to comply with all mitigation measures, conditions of approval and commitments contained in the Development Agreement approved for the proposed Project. Any future operator on the Project site would also be required to comply with the uses approved for the site.
Councilmember Elliott		
LA-15	I've got a question about the greenhouse gas mitigation. One of the features that you had talked about was the EVA charging infrastructure that's going to be provided, I believe that all of the truck bays and at six locations for passenger cars. Is that infrastructure only or is that -- are they actually going to have charging stations? One of the speakers from the public mentioned that Amazon has got all of these electric vehicles and if there's any charging station it seems like then that's not really not a benefit for having, even if it's not Amazon, but for having the infrastructure if these vehicles, these vans and the trucks can't actually charge up, then there's really no point. They do have these vans that are EV, so it would be really good to have the charging station for those vans and reward those drivers if they're contractors for using a zero emission vehicle.	While the IS/MND did not identify a significant GHG impact, the project has committed to further reducing GHG emissions through a number of new measures which are identified in the Supplemental GHG Analysis, included as Attachment 2. These additional sustainability commitments include installation of solar panels on the building roof, EV chargers for 30 parking spaces, and EV-ready infrastructure for all trucks, all vans, and 50% of car parking spaces, among other measures. Providing EV-ready spaces allows installation of the latest technology chargers at the time that electric delivery vans and trucks become operational, rather than installing charging stations immediately that become obsolete at the time that electric vans and trucks become used. (While no tenant has been identified for the Project, Amazon has ordered thousands of electric vans, the first of which are expected to be on the road by 2021.) As a result of this new solar commitment, the project building is projected to have **net-zero electricity consumption**. As a result of these additional commitments, which will be enforced through PDF-GHG-1 through PDF-GHG-5, the project's GHG emissions would continue to be below the significance threshold identified in the MND of 10,000 MT CO2e per year, and would also now be below 3,000 metric tons of CO2e per year even if that threshold were applicable. This Supplemental GHG Report, including these additional sustainability

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		commitments, was also peer reviewed and confirmed by Ramboll, as noted in their peer review memo included as Attachment 1.
Councilmember Zuniga		
LA-16	I have some questions from some residents, a lot of them I'm not going to be able to ask because they don't pertain to this workshop but has there been any -- has there been any studies of the new van hub facilities to take into account what may be happening there? Like Chino and Redlands and all the other locations, has anyone went to those locations to see the potential for Foothill, what we can do -- what we're looking at? We have some people - some residents feeling that the traffic study is flawed.	The proposed project will be a Last Mile warehouse and has a much different size, design, operational and site characteristics than any other Amazon-type facility in the region. Therefore, any trip counts taken of those facilities would not reflect the proposed Project's operations. This is explained in detail below. The following describes the main categories of the warehouse supply chain: • Crossdock Centers. These facilities supply the fulfillment centers. A crossdock facility is a location where containers from foreign vendors are held until more stock is needed at the fulfillment center. This is the back-end of the distribution chain. These facilities are generally between 500,000 to 1,200,000 square feet in size. These facilities are similar to import distribution centers and are used as inventory receiving, break bulk and storage buffers for overseas import containers. Incoming cargo from the ports are received into the crossdock facility and held until a fulfillment center needs a certain item and the relevant merchandise is aggregated into truckloads and transported to the fulfillment center. • Fulfillment Centers. Fulfillment Centers are currently the most common type of facility in Amazon's supply chain. This is where the goods from various vendors, both imports and domestic arrive in containers or large palettes of identical items. This is where an order begins its journey to the customer. Once the order is received, the order goes to a Fulfillment Center where the order is picked and moved along conveyors for packing. Once the box is packed and labeled, the box is sent to a waiting trailer based on shipping method, speed of delivery, and location. Note that at this point, the boxes are not based on the geographic

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		location of the customer. These facilities are generally larger than 600,000 square feet in size. • Sortation Centers. The purpose of Sort Centers is to sort packages by zip code to pallets that are then loaded onto a variety of transportation modes, from Amazon trucks and planes to carriers such as UPS, FedEx, and the U.S. Postal Service. Sortation centers are typically standalone buildings and handle packages for a regional area on behalf of one or more fulfillment centers. These facilities are generally larger than 600,000 square feet in size. • Last Mile Delivery Station. Last Mile Delivery Stations are often the last step in the warehouse supply chain before packages reach a customer. These warehouses are typically positioned within larger metropolitan cities across the country. The Last Mile Delivery Station's primary role is to store packages, and then sort packages based on route optimization (note that the pallets of boxes are already sorted by zip code) for outbound routes to enable last mile delivery to customers. The delivery destinations assigned to one vehicle clustered and are within a tightly defined urban area. These warehouses are smaller with significantly lesser number of trucks, because the delivery radius is limited to a small area. These warehouses are generally between 50,000 to 300,000 square feet in size. The facilities in San Bernardino, Rialto, Redlands, Jurupa Valley, Perris, etc. are all either cross docks, sort facilities, or fulfillment centers. These buildings have the following characteristics – 1. These facilities are much larger in size (600,000 to 1,200,000 square feet) than the proposed project (201,000 square feet) 2. These facilities are much higher up in the logistics chain. As a result, goods arrive and depart by trucks; vans are not used. Automobile trips are all from employees who receive goods, pick and pack orders, or sort boxes. 3. Most of these facilities receive and ship product from and to other

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		warehouse facilities, not to customers. Therefore, driveway counts at these facilities will not provide data that reflects the proposed project's Last Mile warehouse. There is one Last Mile delivery station in Chino. However, trip generation surveys at this warehouse will not provide an accurate representation of the proposed project for several reasons – 1. This location shares its driveway with Motivational Fulfillment & Logistics Services. Therefore, driveway counts at this facility will not isolate traffic from Amazon vs. those from the other facility. 2. The Chino facility has very limited automobile parking. This results in queuing on the streets and the same vehicles entering and exiting within minutes searching for parking spaces. Therefore, driveway counts at this facility will result in over-estimation of trips. In comparison, the project site has ample parking and a total of 50.25 acres of land area. As a result, there will be no queuing on the public streets or multiple trips in and out of the site by employees looking for parking. 3. The Chino facility operates as a Last Mile warehouse with a very high proportion of Amazon Flex deliveries, meaning drivers using their personal vehicles (cars) rather than Amazon vans. Because cars have a much smaller carrying capacity than Amazon vans, they must make many more trips back and forth to the warehouse to pick up goods for delivery resulting in a much higher number of trips, versus an Amazon van which can load up more boxes and much more efficiently plan a single delivery route with multiple customer delivery routes without the need to return to the facility. The proposed project will be using vans as noted by the large number of van parking spaces on the project site plan. The Institute of Transportation Engineers (ITE) is the authority on trip generation used by essentially every lead agency in California. The project's traffic study used ITE's High Cube Parcel Hub warehouse trip rate which reflects delivery/shipping warehouses engaged in package delivery

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		directly to customers. This is the closest approximation to a Last Mile warehouse like the one proposed by the project, and therefore is an appropriate representation of the project's trip generation. All Project vehicles, including employee cars, Project vans, and trucks, were included and fully analyzed in the traffic study included with the IS/MND. As stated in Section 2.1: Project Trip Generation of the traffic study, the trip generation rates used "are inclusive of passenger car, delivery vans, and truck traffic." As such, trips were included from both employee vehicles, as well as from van deliveries, which generated the higher PCE number noted in your comment. As described in Section 2.2 of the traffic study, different trip distribution patterns were specifically analyzed for vans/cars versus trucks. The traffic analysis included in the traffic study and in the IS/MND is based on the guidelines from the SBCTA Congestion Management Program (CMP) and complies with all thresholds required by CEQA and City requirements. Additionally, the traffic study also overestimates the trips created by the Project, as it is based on a 276,000 square foot building, and the building was downsized further to only 201,000 square feet since preparation of the traffic study. That's a nearly 28% reduction compared to the building analyzed in the traffic study, therefore the trip generation will likely be even less than what's presented in the traffic study.
Councilmember Zuniga		
LA-17	So at our first workshop we -- when we first got together and presented all of this to us and I remember saying, hey, you know, as long as you supply us with an EIR, I don't see why there would be any problem with this. And you were pretty sure that an EIR was going to pass -- it would pass an EIR, you had no problem giving that back to us. And then the next time we got together it was time was of the essence and we couldn't get a full EIR. Right? So if you're saying what you've done was the same as an EIR or pretty	Detailed technical studies analyzing the potential environmental impacts of the proposed Project determined that all impacts would be less than significant either before or after mitigation, therefore an IS/MND is the appropriate environmental document consistent with CEQA, and an EIR is not required under CEQA. Nonetheless, all of the technical studies included in the Project's IS/MND are the exact same technical studies that would have been included in an EIR. Each study's level of detail and thorough, comprehensive analysis is the same between this Project's IS/MND and an EIR. The studies show that all potential impacts are reduced to less than significant. Under CEQA, the only additional analysis that an EIR requires is an analysis of project alternatives to consider

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	close, why didn't you just do an EIR?	whether there are any alternatives that would reduce significant impacts that cannot be mitigated to less than significant. Here, because there are no significant impacts after mitigation, CEQA does not require an analysis of project alternatives analysis to reduce impacts. Therefore, there is no project-specific analysis that is missing from the IS/MND which would have been included in an EIR for the Project.
Councilmember Elliott		
LA-18	May, I've asked if I can ask a question that's directly related to this to our attorney, Steven Flowers. I asked this earlier and I want to again ask you, does an environmental impact report provide the City more legal defense in the event that there's a lawsuit against the City in the case of some damages in the future of this project? Does it provide more of a defense for us than the negative declaration?	Under no circumstances, regardless of whether an IS/MND or EIR is prepared, would the City of Upland be liable for any damages. As a standard condition of approval, the City requires that the Applicant indemnify the City and be responsible for all costs associated with preparation of the environmental document, costs associated with any legal challenge of the environmental document, and any associated damages.
Councilmember Zuniga		
LA-19	[Regarding EIR vs MND] So, Brendan, what is the difference on your behalf, is it time, is it money, cost? How long have you known about this project? This has been going on for a couple years now, right, what kind of project was going to happen there? 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 to constitute an emergency on my behalf to allow you guys to go without an EIR. It appears the developer has had enough time to prepare an Environmental Impact Report, but is now attempting to proceed without one due to schedule.	Detailed technical studies analyzing the potential environmental impacts of the proposed Project determined that all impacts would be less than significant either before or after mitigation, therefore an IS/MND is the appropriate environmental document consistent with CEQA, and an EIR is not required. Nonetheless, all of the technical studies included in the Project's IS/MND are the exact same technical studies that would have been included in an EIR. Each study's level of detail and thorough, comprehensive analysis is the same between this Project's IS/MND and an EIR. The studies show that all potential impacts are reduced to less than significant. Under CEQA, the only additional analysis that an EIR requires is an alternatives analysis to consider whether there are any alternatives that would reduce impacts that cannot be mitigated to less than significant. Here, because there are no significant impacts, CEQA does not require an alternatives analysis to try to reduce impacts. Therefore, there is no analysis that is missing. Further, the Project's IS/MND has been subject to multiple peer reviews.

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		A peer review was conducted of the GHG analysis included in the IS/MND by Ramboll, a leading engineering, design and consultancy company which helped develop the South Coast Air Quality Management District's (SCAQMD) preferred GHG emissions model, CalEEMod®, used to develop the GHG emissions inventory for the Project. This peer review memorandum, included as Attachment 1, confirmed that the IS/MND's GHG analysis was prepared using the most-recent, agency-recommended model consistent with SCAQMD guidance and industry standards for estimating GHG emissions and environmental impacts under CEQA. Ramboll's peer review concluded that the IS/MND correctly determined that the Project's GHG emissions would be less than significant. Additionally, while the IS/MND did not identify a significant GHG impact, the project has committed to further reducing GHG emissions through a number of new measures, including installation of solar panels on the building roof, EV chargers for 30 parking spaces, and EV-ready infrastructure for all trucks, all vans, and 50% of car parking spaces, among other measures. As a result of this new solar commitment, the project building is projected to have net-zero electricity consumption. These additional sustainability commitments are described in the Supplemental GHG Analysis, included as Attachment 2. As calculated therein, the project's GHG emissions would continue to be below the significance threshold identified in the MND of 10,000 MT CO2e per year, and would also now be below 3,000 metric tons of CO2e per year even if that threshold were applicable. This supplemental GHG analysis, including these additional sustainability commitments, was also peer reviewed and confirmed by Ramboll, as noted in their memo. The traffic analysis prepared by Translutions included in the Draft IS/MND was peer reviewed by both Gibson Transportation and TKE Engineering. Therefore the traffic study included in the Draft IS/MND is the product of analysis and comments from three independent traffic engineering firms. Further, Rocks Biological Consulting conducted an additional site visit and provided an independent, third-party review of the findings of the habitat assessment. The Supplemental Project Field Survey provided by Rocks Biological Consulting and included as Attachment 5, concurs that there is

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		no potential for federally or state-listed as threatened or endangered plant or wildlife species to occur on the project site. Finally, the Draft IS/MND as a whole was peer reviewed by the City's own Planning staff (with accumulated decades of CEQA experience), Engineering staff, and City Attorney. This review process led to changes and refinements to the IS/MND before its publication for public review. Additionally, since publication of the IS/MND, the environmental document has been further updated and refined as part of extremely comprehensive and detailed responses to comments (this document). For instance, five new sustainability commitments were added to the project as new Project Design Features GHG-1 through GHG-5. As a result of these measures, the project building is projected to have net-zero electricity consumption. Additional intersections were analyzed in response to comments which confirmed the traffic study's less than significant impact conclusions at all potentially impacted intersections. A Health Risk Assessment was completed for the project which confirmed that health risk would be well below AQMD-established health-protective levels. Minor errors were corrected in the hydrology analysis which did not change any of the IS/MND's hydrology conclusions, and a landscape plan was added to the IS/MND. As a result of this very thorough responses to comments documents, the following documents have been added to the IS/MND: • Attachment 1: Peer Review of Greenhouse Gas Technical Report For The Bridge Upland Project Upland, California • Attachment 2: Supplemental GHG Analysis for the Bridge Point Upland Project • Attachment 3: Health Risk Assessment for Bridge Point Upland Project • Attachment 4: Additional Study Intersections Memo • Attachment 5: Supplemental Project Field Survey (including peer review by Rocks Biological Consulting)

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		• Attachment 6: Updated Hydrology Report • Attachment 7: Landscape Plan • Attachment 8: Oct. 9, 2019 CalEEMod AQ/GHG Calculations Consistent with IS/MND
Councilmember Zuniga		
LA-20	You have to understand that property has never been developed, ever. It's next to the airport; so there could be some concerns there, especially on Foothill with -- with the -- that's currently coming into the City so you've got a traffic flow, people that are avoiding the freeway traffic and Baseline. There's a lot of concerns there. So I would think -- I would think that doing the best or the most you can do to get everyone on board would have been more helpful. But you know, we'll see what happens with -- you know maybe you can meet with these other folks here and see what they have and answer their questions and hopefully they'll get on board with it.	Per CEQA Guidelines, the IS/MND evaluated the consistency of the Project with the Cable Airport Land Use Compatibility Plan (ALUCP). Per the ALUCP, the criteria listed in Table 3A of the ALUCP, together with the compatibility zones depicted on Map 3A of the ALUCP are the primary basis for determining whether a proposed land use project would be compatible with Cable Airport activity. The table and map both take into account all four compatibility concerns: noise, safety, airspace protection, and overflight. The analysis found the Project to be consistent with the ALUCP and impacts would be less than significant. Further, the analysis found that the proposed Project would be consistent with the conditions in Chapter 3 of the ALUCP for the C1, C2 and C3 zones and therefore, would not create a safety hazard for people residing or working in the Project area. No buildings would be located in the C1 zone, and the Project would be below all height requirements. Furthermore, the proposed warehouse facility would generally result in fewer employees and visitors than retail, commercial, or residential uses, and therefore is more compatible with the adjacent airport than other similar uses. Accordingly, potential noise and safety impacts to larger populations would be reduced consistent with the Compatibility Criteria in the ALUCP. Traffic study prepared for the IS/MND was based on the guidelines from the SBCTA Congestion Management Program which is followed by the City of Upland. The traffic study was based on traffic counts which counted traffic on Baseline, including any potential for by-pass traffic noted in the comment. While new trips would be created, all of the Project's trips – including employee cars, vans, and trucks – would still create less than a third of the traffic generated by retail store(s) the same size as the proposed Project. Peak hour trips (total in and out including all employee

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		and visitor truck, van and passenger cars) were determined to add less than 5% of trips on Foothill Boulevard, approximately 2% on Benson Avenue, and less than 1% on Baseline Road. Therefore, the proposed Project, even including all the Project vans, is a much lower traffic generator than other uses permitted by the zoning for this property. Finally, the traffic study also overestimates the trips created by the Project, as it is based on a 276,000 square foot building, and the building was downsized further to only 201,000 square feet since preparation of the traffic study. That's a nearly 28% reduction compared to the building analyzed in the traffic study, therefore the trip generation will likely be less than what's presented in the traffic study.
Councilmember Velto		
LA-21	I'd like to bring back your traffic gentlemen and ask a question as to why only 17 locations were part of the traffic study when we have streets such as 16th and Mountain, 15th and Mountain, 14th and Mountain, 13th and Mountain, 16th -- that's an eastbound, I would think Foothill and Mountain, Foothill and Euclid, 16th and Campus traffic. Without saying who this Ecommerce is and without committing to who it is, if it sounds like a duck and walks like a duck, it's probably going to be that duck. And let's just go with -- let's just say it's UPS. Okay, it's going to be a place that's going to have a lot of vehicles passing through it and if your -- if your intentions at those locations are to do a traffic study at those locations that would anticipate there's going to be traffic. I want to call your attention to -- at this one 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 we already have. So I'm concerned why only those 17 locations were studied. I'm not concerned about the delivery, I'm concerned about traversing	In response to this comment, a supplemental traffic analysis was prepared, included as Attachment 4, which analyzed a scenario in which 25% of project trips travel to and from the east on 16th Street and 25% of project trips travel to and from the east on Foothill Boulevard. In sum, this memorandum very conservatively analyzed half of the project trips traveling on these two roadways to the east. As part of this evaluation, the following intersections were added to this supplemental analysis: 1. Mountain Avenue/16th Street; 2. Mountain Avenue/Foothill Boulevard; 3. Euclid Avenue/Foothill Boulevard; and 4. Campus Avenue/16th Street. As shown in Attachment 4, these four intersections would operate at acceptable levels of service (LOS D or better) under both without project and with project conditions. The highest additional delay caused by the project at any of these intersections, even with 25% of project trips traveling through each intersection, is anticipated to be less than half a second. Therefore, the project is not anticipated to create a significant impact at any of the above intersections.

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	through the City. If there's traffic on the 210 freeway much which there is a substantial amount of traffic on the 210 freeway, I can assure you they are not going to get on at Baselines and the 210. Okay. So you -- your traffic pattern is inconsistent with how traffic will flow. That's a fact And you can't tell me any differently okay? So I'd like to know why those were the only intersections that were studied.	Further, the traffic volumes on 13th Street and 15th Street are much lower than those on 16th Street and Foothill Boulevard. Since the project does not have a significant impact at the intersections evaluated above, it is anticipated that there will be a less than significant impact at the intersections of Mountain Avenue/13th Street and Mountain Avenue/15th Street. Additionally, the traffic study also overestimates the trips created by the Project, as it is based on a 276,000 square foot building, and the building was downsized further to only 201,000 square feet since preparation of the traffic study. That's a nearly 28% reduction compared to the building analyzed in the traffic study, therefore the trip generation will likely be even less than what's presented in the traffic study.
Councilmember Velto		
LA-22	And if the VMT, you know, the vehicle miles traveled is not currently required by CEQA; is that correct? Why is it considered best practice in the traffic versus level of service, is it better to be used by municipalities?	Vehicle Miles Traveled (VMT) is not currently the City's or the County's adopted methodology for measuring transportation impacts, and as a result, there are a number of issues with attempting to use VMT to analyze the proposed project. At this time, neither the City nor SBCTA has an adopted methodology, thresholds, or procedures to analyze VMT in the area. Second, VMT only measures passenger vehicles miles of travel, not truck trips or truck VMT. Section 15064.3, subdivision (a), states, *"For the purposes of this section, 'vehicle miles traveled' refers to the amount and distance of automobile travel attributable to a project."* (emphasis added). Therefore, in the case of the proposed project, VMT would not account for the distances traveled by the trucks or van trips related to the project. Finally, VMT is intended to measure the impact of a project on a regional or subregional area and therefore it is not a useful metric for analyzing the amount of traffic or congestion that would be experienced in the local community due to a new project, as explained below. The state has imposed the future requirement for a VMT analysis on all local cities as of July 1, 2020, regardless of whether local cities would prefer a VMT or the current LOS methodology used. VMT only measures the total distance traveled by automobile trips generated by the project, with the goal of reducing the average distances

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		traveled. It is useful tool to evaluate regional land use planning – such as jobs housing balance, access to transit, etc., which affect personal travel patterns to work, shopping, or personal activities. On the other hand, the current metric of LOS (level of service) measures the delay caused by vehicles waiting in traffic at intersections, and therefore measures the actual traffic congestion experienced by drivers before and after the opening of a project. As an example of LOS, under Year 2020 conditions the intersection of Central Avenue/Foothill Boulevard has an average delay (per vehicle) of approximately 32.9 seconds during the evening peak hour and therefore, operates at LOS C. After the addition of project traffic, this delay measurement increases to 33.4 seconds of delay which means that the intersection would still operate at LOS C. The City of Upland has set LOS D as the acceptable standard for operating conditions at this intersection and therefore the addition of project traffic would not exceed the City standard and no significant impact would result from the addition of project traffic. Similar conclusions are drawn from the analysis of Year 2040 conditions. LOS is also a better tool for cities to evaluate what roadway (or transit) infrastructure is needed to reduce traffic congestion, and leads to mitigation like physical street improvements. In contrast, VMT does not provide for mitigation such as street improvements, and actually discourages improvements such as street widening or new turn lanes. Under the VMT approach, such street improvements would incentivize more people to drive and use public streets. Therefore, a VMT analysis would not lead to physical street improvements to the City's roadways, and in fact would discourage implementation of such improvements. In sum, LOS is the current required methodology for analyzing traffic impacts in the City of Upland and the SBCTA Congestion Management Program (CMP), not VMT; there is not an CMP or Upland-adopted methodology or threshold for analyzing VMT and therefore the traffic analysis for the project was prepared according to the current City requirements. VMT does not measure actual traffic congestion levels and thus will not result in the type of mitigation that will improve vehicle circulation and reduce congestion.

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Councilmember Velto		
LA-23	Why are they using a particular greenhouse threshold for industrial -- for industrial rather than for commercial and retail, why are you using that? Why are we using that. But what would go the -- what would be the service population count? Would -- there be a count of some kind. So you're defining this as an industrial project? Not commercial retail? Would commercial retail be higher, would it be Tier 4? Would commercial retail be Tier 4 (specifically this project). So the lead agency says it's going -- it's industrial. The zoning for that is -- 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? If it's mixed-use commercial then commercial could -- we could apply a commercial requirement then for the tier -- to the tier for the -- excuse me, for that. What my concern is air quality. We could technically do that. I would think the State of California, as concerned as they are about greenhouse gas effects, would probably lean towards what I'm thinking; so I -- I do -- I want to make sure that as we move down this path that we -- we are -- we're coming -- We're holding this to a highest standard possible is what you're trying do because if Upland is going to be known for this type ever a facility, then why not take it to the highest standard of -- of -- of care if we're going to -- if it has the potential to be approved? That's one thing I want to look at. Now, I'm not looking for accolades here or applause but I want to make sure is that -- is that we're holding this to the highest standard of care so that we make sure that if the future that we've prevented any potential problems health wise and environmentally today that we don't know about in the future. Is it would be great if they go to all electric, if all this -- all this great stiff happens but I'm still going to go back to the amount of traffic we're going to see increase because of any project, again, walks like a duck, talks like a duck, it's a duck. And, I'm sorry, I just want to make sure that we've covered everything to the extreme I	A peer review was conducted of the GHG analysis included in the IS/MND by Ramboll, a leading engineering, design and consultancy company which helped develop the South Coast Air Quality Management District's (SCAQMD) preferred GHG emissions model, CalEEMod®, used to develop the GHG emissions inventory for the Project. This peer review memorandum, included as Attachment 1, confirmed that the IS/MND's GHG analysis was prepared using the most-recent, agency-recommended model consistent with SCAQMD guidance and industry standards for estimating GHG emissions and environmental impacts under CEQA. Ramboll's peer review concluded that the IS/MND correctly determined that the Project's GHG emissions would be less than significant. Ramboll also reviewed the GHG significance thresholds used to assess the Project's GHG emissions. The MND uses a 10,000 metric ton (MT) of carbon dioxide equivalent emissions (CO_2e) per year threshold to assess significance of the Project. The SCAQMD has not adopted a GHG significance threshold that applies to most land use development projects. The 10,000 MT CO_2e per year threshold was adopted to capture 90 percent of total emissions from all new or modified industrial (stationary source) projects.[9] A 3,000 MT CO_2e per year value was proposed as a screening threshold for land use development projects but was never adopted in any form by SCAQMD. In the absence of an adopted threshold, the lead agency has discretion to select a significance threshold. Thus, in this context, many lead agencies have applied the 10,000 MT CO_2e per year as a significance threshold because it was adopted by SCAQMD. Various lead agencies have used different approaches as a GHG significance threshold for warehouse development projects, including relying on the 10,000 MT CO_2e per year significance threshold. Based on Ramboll's assessment of the current state of the GHG CEQA practice, the IS/MND's approach to assess the significance of GHG emissions using

[9] Available at: http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds. Accessed: January, 2020.

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	and want -- I would love to see the project work properly.	10,000 MT CO_2e per year is consistent with the current common approaches by lead agencies to evaluate a warehouse project's GHG emissions under CEQA. Additionally, while the IS/MND did not identify a significant GHG impact, the project has committed to further reducing GHG emissions through a number of new measures, including installation of solar panels on the building roof, EV chargers for 30 parking spaces, and EV-ready infrastructure for all trucks, all vans, and 50% of car parking spaces, among other measures. As a result of this new solar commitment, the project building is projected to have **net-zero electricity consumption.** These additional sustainability commitments are described in the Supplemental GHG Analysis, included as Attachment 2. As calculated therein, the project's GHG emissions would continue to be below the significance threshold identified in the MND of 10,000 MT CO2e per year, and would also now be below 3,000 metric tons of CO2e per year even if that threshold were applicable. This supplemental GHG analysis, including these additional sustainability commitments, was also peer reviewed and confirmed by Ramboll, as noted in their memo.
Commissioner Novikov		
LA-24	About the noise impact, so that's about the families that have kids along the Central Avenue, we have apartment complexes there. And I drive there quite often taking my kids to a karate studio right at that intersection on Central; so I look at the parkings (sic), they are really situated about less than 10 feet away from Central Avenue. Now, if we're thinking about adding all these trucks, right, at night, 20 trucks? That's about maybe one truck every 20 minutes; so how do you determine, with these numbers that you have, that it has less than significant impact? Because I live in a gated community where we have a truck -- delivery truck coming, UPS, FedEx, all right, I wake up from just the lights and it takes me 20 minutes to go back to sleep; so I want to think about those families and how did you really consider them? Did you think about them – Were the people asked their -- you know, maybe by the company, by the	The Project would not generate a perceivable traffic noise increase. Traffic noise was modeled and analyzed in the IS/MND and project Acoustical Assessment. The traffic volumes are based on existing and Project specific traffic data. As shown in Table 10 and Table 11 of the Acoustical Assessment, the greatest increase in noise between with and without Project conditions would occur on Central Avenue between Foothill Blvd and 11th Street. At this location, traffic noise would increase by 0.7 dBA which is below the human ear's ability to perceive. Therefore, as stated in the Acoustical Assessment, traffic noise impacts would be less than significant. It should be noted that the Project would generate daily 50 truck trips, which is less than the dozens of truck trips currently occurring from the rock crushing operations. The noise analysis conservatively did not take credit for the existing trucks on the site that would no longer

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	Bridge Development who were already living there along -- along the Central Avenue? Did you go and speak inside the apartment, you know, to measure some – So basically you believe that this number is the best you have that they will not impact people living, right? I mean, I'm just talking about one specific area. There are some other areas -- you know, there are many areas that this –	occur if the Project was operational. Additionally, as discussed in the IS/MND and Acoustical Assessment, noise from all Project vehicles, including trucks, vans and employee cars were analyzed. As noted above the analysis determined that Project generated roadway noise would not create a perceivable difference in noise volumes compared to existing conditions. All roadway noise impacts would be less than significant. Nighttime noise levels were considered and included in the analysis; in fact, the traffic noise analysis used a 24-hour noise metric that accounts for noise sensitivity during evening and nighttime hours. Furthermore, it should be noted that it is outside of the scope of CEQA and not standard practice to measure noise levels inside of residences. The analysis in the IS/MND shows that the Project would not result in a perceivable increase in traffic noise levels. Therefore, the interior noise increases (if any) would also not be noticeable or significant.
Commission Chair Aspinall		
LA-25	This is more on process, I think for the staff. Tonight I know we can only talk about what has been presented and the -- the initial study and MND. But what --Does -- does the financial aspects of this project go to the Planning Commission or does that go to the City Council? So the Planning Commission will not get into -- it's only limited 22 to – Will they be at the same time and as typically --	The Development Agreement will include the financial commitments proposed as part of the project. The Planning Commission will make a recommendation as to the Development Agreement at the currently scheduled February 12 public hearing, and the City Council will be the final decisionmaker on approval of the Development Agreement.
Commissioner Walker		
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?	The scope of the City's Municipal Code does not provide authority for the City to determine or review the choice of tenant that may occupy the building. *Friends of Davis v. City of Davis* (2000) 83 Cal.App.4th 1004, 1013-14. While tax revenue to the City is outside the scope of the environmental analysis in the IS/MND, the project's proposed Development Agreement provides for an annual contribution for road maintenance, with the term

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		of the contribution to be determined as part of the public review process. This annual contribution would be just part of the project's multi-million dollar financial commitment to the City included in the proposed Development Agreement, and in addition to the approximately $2.5 million in City fees that the project will also be paying. The annual contribution is intended to replicate what the City could theoretically collect in sales tax from a retail project of similar size—however, at this dollar amount, the project's proposed annual contribution is the equivalent of a top 10 sales tax producer for the City. Additionally, while sales tax is variable (and mostly down over the last decade), and retail is generally declining, this would be guaranteed revenue for the City, and, again, would make the project one of the largest revenue sources for the City.
Commissioner Walker		
LA-27	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. And it will be available online as well?	Written responses to comments will be provided directly to individual commenters and will be posted online. All comments will be provided at least 10 days in advance of the February 12 City Planning Commission public hearing.
Letter from City of Claremont, dated January 21, 2020		
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	As described in detail in the responses to comments below, the proposed project will be a Last Mile warehouse and not a Fulfillment Center. Additional project description information is provided in the responses below which explain the operation of the proposed Last Mile warehouse, and how it fits at the end of the much larger warehouse supply chain, and therefore operates differently than much larger Fulfillment Centers. The project's proposed Last Mile warehouse has much different size, operational and site characteristics than any other Amazon facility in the region, therefore any trip counts taken of those facilities would not reflect

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	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.	the proposed Project's operations. While no tenant has been identified for the proposed project warehouse, in response to the commenter's questions, the following describes the main categories of the Amazon warehouse supply chain: • Crossdock Centers. These facilities supply the fulfillment centers. A crossdock facility is a location where containers from foreign vendors are held until more stock is needed at the fulfillment center. This is the back-end of the distribution chain. These facilities are generally between 500,000 to 1,200,000 square feet in size. These facilities are similar to import distribution centers and are used as inventory receiving, break bulk and storage buffers for overseas import containers. Incoming cargo from the ports are received into the crossdock facility and held until a fulfillment center needs a certain item and the relevant merchandise is aggregated into truckloads and transported to the fulfillment center. • Fulfillment Centers. Fulfillment Centers are currently the most common type of facility in Amazon's supply chain. This is where the goods from various vendors, both imports and domestic arrive in containers or large palettes of identical items. This is where an order begins its journey to the customer. Once the order is received, the order goes to a Fulfillment Center where the order is picked and moved along conveyors for packing. Once the box is packed and labeled, the box is sent to a waiting trailer based on shipping method, speed of delivery, and location. Note that at this point, the boxes are not based on the geographic location of the customer. These facilities are generally larger than 600,000 square feet in size. • Sortation Centers. The purpose of Sort Centers is to sort packages by zip code to pallets that are then loaded onto a variety of transportation modes, from Amazon trucks and planes to carriers such as UPS, FedEx, and the U.S. Postal Service. Sortation centers are typically standalone buildings and handle packages for a regional area on behalf of one or more fulfillment centers. These facilities are generally larger than 600,000 square feet in size.

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		• Last Mile Delivery Station. Last Mile Delivery Stations are often the last step in the warehouse supply chain before packages reach a customer. These warehouses are typically positioned within larger metropolitan cities across the country. The Last Mile Delivery Station's primary role is to store packages, and then sort packages based on route optimization (note that the pallets of boxes are already sorted by zip code) for outbound routes to enable last mile delivery to customers. The delivery destinations assigned to one vehicle clustered and are within a tightly defined urban area. These warehouses are smaller with significantly lesser number of trucks, because the delivery radius is limited to a small area. These warehouses are generally between 50,000 to 300,000 square feet in size. The facilities in San Bernardino, Rialto, Redlands, Jurupa Valley, Perris, etc. are all either cross docks, sort facilities, or fulfillment centers. These buildings have the following characteristics – 1. These facilities are much larger in size (600,000 to 1,200,000 square feet) than the proposed project (201,000 square feet) 2. These facilities are much higher up in the logistics chain. As a result, goods arrive and depart by trucks; vans are not used. Automobile trips are all from employees who receive goods, pick and pack orders, or sort boxes. 3. Most of these facilities receive and ship product from and to other warehouse facilities, not to customers. Therefore, driveway counts at these facilities will not provide data that reflects the proposed project's Last Mile warehouse. In fact, the WRCOG study includes counts at Fulfillment Centers in Riverside and the resulting average trip generation rates are less than those used in the Project's traffic study. There is one Last Mile delivery station in Chino. However, trip generation surveys at this warehouse will not provide an accurate representation of the proposed project for several reasons –

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		1. This location shares its driveway with Motivational Fulfillment & Logistics Services. Therefore, driveway counts at this facility will not isolate traffic from Amazon vs. those from the other facility. 2. The Chino facility has very limited automobile parking. This results in queuing on the streets and the same vehicles entering and exiting within minutes searching for parking spaces. Therefore, driveway counts at this facility will result in over-estimation of trips. In comparison, the project site has ample parking and a total of 50.25 acres of land area. As a result, there will be no queuing on the public streets or multiple trips in and out of the site by employees looking for parking. 3. The Chino facility operates as a Last Mile warehouse with a very high proportion of Amazon Flex deliveries, meaning drivers using their personal vehicles (cars) rather than Amazon vans. Because cars have a much smaller carrying capacity than Amazon vans, they must make many more trips back and forth to the warehouse to pick up goods for delivery resulting in a much higher number of trips, versus an Amazon van which can load up more boxes and much more efficiently plan a single delivery route with multiple customer delivery routes without the need to return to the facility. The proposed project will be using vans as noted by the large number of van parking spaces on the project site plan. The trip rates used for the Project in the IS/MND's traffic study are conservative and actually higher than if the Western Riverside Council of Governments (WRCOG) Trip Generation Study rates were used, as discussed further below. The rates for High Cube Fulfillment Center Warehouse rates included in the Institute of Traffic Engineers' (ITE) Trip Generation, 10th Edition (which supersede the ITE Memo referenced by the Commenter) do result in higher trips during the p.m. peak hour, though the a.m. peak hour and daily trips are lesser. An analysis was conducted for the p.m. peak hour using these rates, which showed an insignificant change in delay compared to those disclosed in the Project's traffic study, and does not result in significant impacts. The findings are reported in the responses to the Peer Review comments below.

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		The Project's truck trip distribution was developed based on review of the freeway network relative to the Project site and based on discussion with City staff. A majority of the warehouses in the area from which the Project's Last Mile facility would get its goods are along the I-10 freeway. Regardless, the project is anticipated to generate only 1 truck trip during each of the AM and PM peak hours, given the Project's limitation of only 5 truck trips during the day. Therefore, since 1 truck could not be divided into two routes (one to the I-10 and one to the I-210), Central Avenue to the I-10 was chosen given the closer proximity to nearby warehouses from which the project's Last Mile facility would receive its packages Even if this one truck trip was assumed to go to the I-210, the traffic study's significance conclusions would not change. Given the restriction of a maximum of 5 daytime trucks, almost all of the Project's trucks would travel to and from the freeways at night, well outside the peak hours, when the least number of vehicles are on the road. Therefore, the direction of these nighttime trucks to either the I-10 or I-210 Freeways would not change the traffic study's conclusions, which analyzes impacts in the peak hours. Detailed responses to each of the third-party peer reviewer's comments are provided below.
LA-28b	[Attached comments:] This includes a Review of: • 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	This project is not a Fulfillment Center, but rather a Last Mile warehouse that is the last step in the warehouse supply chain before a package reaches a customer. A High Cube Parcel Hub warehouse reflects delivery/shipping facilities like UPS and FedEx which are engaged in package delivery directly to customers. This is the closest approximation to a Last Mile warehouse like the one proposed by the project. As explained in a 2017 study by the Texas A&M Transportation Institute's report PRC 17-79 "How Will E-commerce Growth Impact Our Transportation Network?" (available online here: https://static.tti.tamu.edu/tti.tamu.edu/documents/PRC-17-79-F.pdf), which is based on Amazon, there are many steps in the ecommerce supply chain. Fulfillment Center are one of the first steps in the warehouse supply chain. Boxes are packed in Fulfillment Centers, and then shipped out to another layer of warehouse. As described above, Amazon's most recent

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	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." 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	Fulfillment Centers are generally between 500,000 to 1,200,000 square feet in size. Last Mile warehouses are much smaller in size and have much different operational characteristics, including much higher proportion of automobile trips than trucks. As the proposed project is only approximately 201,000 square feet in size and will be 98% automobile trips, it does not have the physical footprint (size) or operational characteristics to support the packing and shipping activities of an Amazon Fulfillment Center-type facility. Thus the Project will not fit the trip generation characteristics of a Fulfillment Center. An illustrative graphic is provided below from MetroFrieght, a consortium of USC and CalState Long Beach, that explains the ecommerce supply chain. Available online here: https://globalcitylogistics.org/?page_id=326

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	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).	
LA-28c	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 times? Do employees take the vans home and arrive in the vans? Or will employees arrive and leave by	The proposed project provides the "last mile" of the online customer order delivery process. Packages will be shipped to this warehouse from much larger fulfillment and sortation centers via large trucks primarily in the nighttime hours, stored on-site, and sorted based on address and delivery timing, loaded into small delivery vans, and then delivered to nearby residents. Van drivers will travel to the project site with their personal vehicles (or public transit), park their personal vehicles on site, and then pick up the loaded vans for deliveries. At the end of the delivery shift, vans

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	personal cars, driving these vans for local deliveries throughout the day. 1,104 parking spaces for vans is a significant amount of parking spaces.	are returned to their parking location on site, and drivers leave the project site in their personal vehicles or public transit as applicable. Van deliveries will occur during the daytime and early evening hours, but home deliveries will not generally occur at night. However, a maximum of only 5 large trucks will travel to/from the site during daytime hours, with a total of only 25 daily. The last mile warehouse is a 24-hour operation, however the nighttime operations will consist of unloading the large truck deliveries, sorting the packages and goods and then storing the packages and goods (all inside the building) and will not include van deliveries. While understanding the concern regarding the number of van parking spaces proposed on site, van parking spaces are not an indicator of actual trip generation. Rather, the trip generation rate is appropriately based on building square footage because building square footage represents the total amount of goods/delivery capacity of a building. The number of van deliveries is capped by the size, i.e. capacity, of the building to sort and store goods for delivery. This is why the ITE trip generation rate is based on building square footage, and not van parking spaces. Further, in this case, total van deliveries (and, thus, trip generation) is limited due to the daily truck delivery cap. Nevertheless, the number of van parking spaces can be an indicator of factors unrelated to actual van delivery needs, such as lease terms between developer and tenant. For instance, since a tenant frequently pays a developer based on total land area developed, additional developed area (including parking spaces) may be a function of lease price rather than parking demand.
LA-28d	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?	See above.

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LA-28e	Comment 4: Project site layout and parking fits the description of a Fulfillment Center rather than a Parcel Hub Warehouse. 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	The commenter is correct in the definitions for various High Cube Warehouse types included in the ITE Study as well as the WRCOG Study. However, the project is not proposed as an Amazon Fulfillment Center-type facility nor does it provide the necessary physical characteristics (size) to support this type of use. A close look at the data supporting the ITE Fulfillment Center trip rate and the WRCOG study demonstrates that neither reflect the type of small-sized, Last Mile warehouse proposed by the project. Reviewing the data points included in the ITE Study (and Trip Generation, 10th Edition for ITE Land Use Code 155, which incorporates findings from the 2016 study), the daily trip rate of the ITE defined Fulfillment Center Warehouse is based on ONE data point (from Texas) which is over 1,200,000 square feet, and the peak hour rates add data from another facility that is approximately 800,000 sf. The ITE data points for Fulfillment Centers represent facilities that are significantly larger than the proposed Project. Similarly, the WRCOG study of Fulfillment Centers in Riverside County studied only one facility that was 300,000 sf (still 50% larger than the proposed project). All other facilities were 500,000 to nearly 1,500,000 square feet in size. The smallest building in the WRCOG study was approximately 300,000 square feet and generated approximately 500 daily trips (see Exhibit 1 below); however, this facility is not described as a Last Mile facility. The Project's traffic study estimates 2,483 daily trips for a much smaller building; the Project's much higher trip generation estimate is therefore conservative. See response to comment below for additional information about the WRCOG Study.

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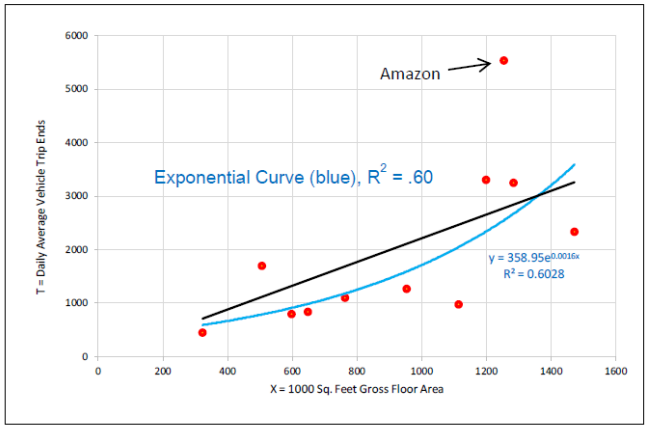
	levels for product storage and Pick-and-pack area comprises majority of space, larger parking supply ratio than for all other HCW types. Typical Fulfillment Centers 1. Walmart: 6750 Kimball Ave, Chino, CA 91708 2. Amazon: 24208 San Michele Rd, Moreno Valley, CA 92551 3. Lineage Logistics: 1001 Columbia 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	**Exhibit 1: Data Plot for Daily Total Vehicle Trip Ends against Building Size (Fulfillment Center)** 

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	15. UPS Chain Logistics: 11811/11991 Landon Drive, Jurupa Valley, CA 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 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.	As previously described, the project is not proposed as an Amazon Fulfillment Center-type facility nor does it provide the necessary physical characteristics to support this type of use. Neither the ITE study for Fulfillment Centers nor the WRCOG Study have a Last Mile warehouse identified in the data sets, as described in the previous response. Nonetheless, an analysis is provided below of both the WRCOG study and the ITE rate for Fulfillment Center. The WRCOG study surveyed 11 Fulfillment Centers, from 300,000 square feet to nearly 1,500,000 square feet in size, all larger than typical Last Mile facilities. Exhibit 6 from the WRCOG study shows the trip generation rates (pasted below). **Exhibit 6: Summary of Trip Generation Rates per Thousand Square Feet of Gross Floor Area for Fulfillment Centers** | Vehicle Class | AM Peak Hour | | PM Peak Hour | | Daily | | | | Conventional Warehouse* | Fulfillment Center | Conventional Warehouse | Fulfillment Center | Conventional Warehouse | Fulfillment Center | | Cars | 0.057 | 0.103 | 0.086 | 0.144 | 1.000 | 1.750 | | 2-4 Axle Trucks | 0.009 | 0.008 | 0.013 | 0.011 | 0.221 | 0.162 | | 5-Axle Trucks | 0.015 | 0.011 | 0.010 | 0.010 | 0.233 | 0.217 | | Total | 0.082 | 0.122 | 0.108 | 0.165 | 1.432 | 2.129 | | % Higher than Conventional | | 49% | | 52% | | 49% | * Transload, Short-Term Storage category in 2016 TIE/ NAIOP/ SCAQMD study When compared to the ITE trip generation rates for a Fulfillment Centers, the locally developed WRCOG rates are substantially lower: | | ITE Fulfillment Center Rate | WRCOG Average | | Daily | 8.18 trips/1,000 sf | 2.129 trips/1,000 sf | | AM Peak Hour | 0.59 trips/1,000 sf | 0.122 trips/1,000 sf | | PM Peak Hour | 1.37 trips/1,000 sf | 0.165 trips/1,000 sf | The WRCOG study does identify one Amazon facility as a statistical outlier. As shown in the WRCOG study, the approximate trips generated by an

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approximately 1,250,000 square foot Amazon facility and the corresponding trip rates are:

	WRCOG-specific Amazon facility	
Daily	5,700 trips	4.56 trips/1,000 sf
AM Peak Hour	500 trips	0.40 trips/1,000 sf
PM Peak Hour	700 trips	0.56 trips/1,000 sf

If the average WRCOG average trip rates and the WRCOG-specific Amazon facility data point were applied to the proposed Project, the respective trip generation estimates of the proposed 201,000 SF facility would be:

	WRCOG-Average	WRCOG-Amazon Specific Data Point	Project's Trip Generation From IS/MND
Daily	427 trips	917 trips	2,483 trips
AM Peak Hour	25 trips	80 trips	198 trips
PM Peak Hour	33 trips	113 trips	198 trips

As shown above, both the WRCOG-average and WRCOG-Amazon specific data points result in much lower trip generation estimates than identified in the Project's traffic study. As the Project's traffic study trip estimate is substantially higher, it provides a more conservative analysis than using the WRCOG data.

If the average rate from ITE for High Cube Fulfillment Centers were applied to the proposed Project, the respective trip generation estimates of the proposed 201,000 SF facility would be:

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Table A - Project Trip Generation Using ITE Average High Cube Fulfillment Center Rates

			Peak Hour						
			AM Peak Hour			PM Peak Hour			Daily
Land Use		Units	In	Out	Total	In	Out	Total	
High-Cube Fulfillment Center Warehouse	201.0	Per TSF	0.295	0.295	0.590	0.932	0.438	1.370	7.750
Passenger Vehicles Inbound/Outbound Splits			50%	50%	100%	68%	32%	100%	50%/50%
Total Vehicles			**59**	**60**	**119**	**187**	**89**	**276**	**1,558**
Passenger Cars			57	57	114	183	87	270	1,418
2-3 Axle Trucks			2	2	4	4	2	6	125
4+ Axle Trucks			0	1	1	0	0	0	15
Total Trucks			2	3	5	4	2	6	140
Truck PCEs			4	7	11	8	4	12	295
Total Trip Generation (PCE)			**63**	**67**	**130**	**195**	**93**	**288**	**1,853**

As seen above, the trip generation would be substantially lower for the daily trips and a.m. peak hour but slightly higher during the p.m. peak hour. An analysis was conducted for 2040 conditions because traffic volumes are highest during that analysis scenario (i.e. higher than during the 2020 buildout conditions). The Table below shows a comparison of the LOS under Year 2040 LOS using rates for Fulfillment Center and Parcel Hub. As seen on the table, there is minimal change in delay and none of the LOS grades change. Since the LOS at all intersections are acceptable under 2040 conditions, the intersections will also operate at satisfactory LOS under Opening Year 2020 conditions. Therefore, the projects impacts are less than significant even using the ITE rate for Fulfillment Centers.

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Table F: Year 2040 With Project Intersection Levels of Service (Comparison of Parcel Hub & Fulfillment Center)

	Intersection	LOS Std.	Jurisdiction	Control	PM Peak Hour (With Project Conditions) Land Use 156 (from TIA) Delay	LOS	ITE Land Use 155 (Fulfillment Center) Delay	LOS	Delay Change (sec.)
1	Monte Vista Avenue/Baseline Road	E	Claremont	Signal	27.1	C	27.2	C	0.1
2	SR-210 Ramps/Baseline Road	D	Caltrans	Signal	42.4	D	42.5	D	0.1
3	Benson Avenue/Baseline Road	D	Upland	Signal	45.8	D	46.5	D	0.7
4	Benson Avenue/15th Street	D	Upland	Signal	5.4	A	5.4	A	0.0
5	Benson Avenue/13th Street	D	Upland	Signal	29.4	C	29.6	C	0.2
6	Monte Vista Avenue/Foothill Boulevard	D	Upland	Signal	36.9	D	37.2	D	0.3
7	Central Avenue/Foothill Boulevard	D	Upland	Signal	33.3	C	33.4	C	0.1
8	Project Driveway/Foothill Boulevard	D	Upland	TWSC	10.6	B	10.6	B	0.0
9	Benson Avenue/Foothill Boulevard	D	Upland	Signal	50.8	D	51.2	D	0.4
10	Central Avenue/11th Street	D	Upland	Signal	29.0	C	29.2	C	0.2
11	Central Avenue/Arrow Route	D	Upland	Signal	30.9	C	31.1	C	0.2
12	Central Avenue/Arrow Highway	D	Montclair	Signal	47.1	D	47.2	D	0.1
13	Central Avenue/Moreno Street	D	Montclair	Signal	33.3	C	33.4	C	0.1
14	Central Avenue/I-10 Westbound Ramps	D	Caltrans	Signal	12.2	B	12.5	B	0.3
15	Central Avenue/I-10 Eastbound Ramps	D	Caltrans	Signal	24.2	C	24.2	C	0.0
16	Project Driveway 2/Foothill Boulevard	D	Upland	TWSC	12.7	B	12.8	B	0.1
17	Monte Vista Avenue/Claremont Boulevard	E	Claremont	Signal	15.2	B	15.2	B	0.0

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.	As previously described, the project is not proposed as an Amazon Fulfillment Center-type use nor does it provide the necessary physical characteristics to support this type of use. The referenced facilities in San Bernardino and Fontana are existing Amazon Fulfillment Centers; these facilities are physically and operationally different than the proposed project. Please see discussion included earlier part of this letter for a discussion of the various warehouse types that are part of the Amazon supply chain.
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.	The mix of cars versus trucks used in the Project's traffic study is comparable to the vehicle mix identified above. Further, the Project is limited to a total of 25 daily truck trips, with no more than 5 trucks during the day, therefore the Project's vehicle mix will be limited to approximately 98% cars/vans daily, and 2% trucks daily. Given the limitation on daytime trucks, a maximum of 1 truck (2 trips) is anticipated in each of the A.M. and P.M. peak hours. It should also be noted that based on this comment, a trip generation for the proposed project using ITE rates

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		for Fulfillment Centers and these truck splits were conducted for the p.m. peak hour (the ITE trip generation is lower during the a.m. peak hour, and the TIA presents a worst case analysis). The increase in delay under 2040 conditions are forecast to be minimal and all intersections are forecast to operate at satisfactory levels of service; impacts would be less than significant. Since the LOS at all intersections are acceptable under 2040 conditions, the intersections will also operate at satisfactory LOS under Opening Year 2020 conditions. Therefore, the projects impacts are less than significant.
LA-28i	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.	The Project truck trip distribution was developed based on review of the freeway network relative to the Project site and based on discussion with City staff. A majority of the warehouses in the area from which the Project's Last Mile facility would get its goods are along the I-10 freeway. Regardless, the project is anticipated to generate only 1 truck (2 trips, one inbound and one outbound) during each of the AM and PM peak hours, given the Project's limitation of only 5 truck during the day. Therefore, since 1 truck could not be divided into two routes (one to the I-10 and one to the I-210), the I-10 was chosen given the closer proximity to nearby warehouses from which the project's Last Mile facility would receive its packages Even if this one truck trip was assumed to go to the I-210, the traffic study's significance conclusions would not change. Most of the Project's trucks would travel to and from the freeways at night, well outside the peak hours, when the least number of vehicles are on the road.
LA-28j	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.	While understanding the concern regarding the number of van parking spaces proposed on site, van parking spaces are not an indicator of actual trip generation. Rather, the trip generation rate is appropriately based on building square footage because building square footage represents the total amount of goods/delivery capacity of a building. The number of van deliveries is capped by the size, i.e. capacity, of the building to sort and store goods for delivery. This is why the ITE (and other such sources) trip generation rate is based on building square footage, and not van parking spaces. Further, in this case, total van deliveries (and, thus, trip generation) is limited due to the daily truck delivery cap.

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		Nevertheless, the number of van parking spaces can be an indicator of factors unrelated to actual van delivery needs, such as lease terms between developer and tenant. For instance, since a tenant frequently pays a developer based on total land area developed, additional developed area (including parking spaces) may be a function of lease price rather than parking demand.
LA-28k	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.	All cumulative projects from Claremont were included in the analysis and were included in Figure 09 and Table C of the Traffic Impact Analysis (Appendix H-1 of the IS/MND. As requested by the commenter, city names have been added to Table C from the traffic study, which will be provided to the City of Claremont.
LA-28l	COMPARISON OF LEVEL OF SERVICE AND VOLUME DATA FROM THIS REPORT TO THE ANALYSIS SUBMITTED FOR SYCAMORE HILLS MASTER PLAN DATED NOVEMBER 15, 2018. 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 6th 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.	As stated in the comment, the IS/MND used the HCM 6th Edition and this may be the reason for the difference in LOS calculation results. The important fact here is that the Project IS/MND study consistently used the HCM 6th Edition for both the "with" and the "without" Project calculations and therefore the incremental impacts of the Project are accurately identified in the document.

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	See Comment Letter LA-28 for Attachments	
Letter from City of Montclair, dated January 21, 2020		
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-mllllon-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 1- 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 1-10 Freeway, and only Central Avenue as an alternative. Mountain Avenue has both direct connectivity to both the 1-10 and 1-210 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.	In recognition of the community's concerns regarding truck traffic, the Applicant has agreed to enforceable Conditions of Approval that would limit the Project trucks to a maximum of 5 during the daytime, and 25 in total per day. The proposed project will only be generating 25 trucks a day, which is considerably less than the number of trucks that would be generated by a same-size retail building on the site, and considerably less than the dozens of trucks per day generated by the existing rock and gravel processing operations. Further, the project is anticipated to generate only 1 truck (2 trips, one inbound and one outbound) during each of the AM and PM peak hours, given the Project's limitation of only 5 truck during the day. Most of the Project's trucks would travel to and from the freeways at night, well outside the peak hours, when the least number of vehicles are on the road. As a result, no significant impacts are anticipated at any of the intersections with the City of Montclair, as noted in the traffic study.

Comment Number	Comment	Response
Individual Responses		
Letter from C. Contreras, dated December 18, 2019		
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	Yes, the proposed Project has been reviewed by the South Coast Air Quality Management Control District, the California Air Resources Board, and the California Department of Transportation. The IS/MND was sent to the State Clearinghouse for distribution to those and other state and regional agencies for review and comment.
Letter from C. Moffitt, dated December 18, 2020		
I-2	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." 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	The Applicant has agreed to enforceable Conditions of Approval that would limit the Project trucks to a maximum of 5 during the daytime, and 25 in total per day. For reference, the existing rock and gravel processing operations generate dozens of trucks per day to off-haul materials processed onsite. However, all Project vehicles including employee cars, Project vans, and trucks, were included and fully analyzed in the traffic study included with the IS/MND. As stated in Section 2.1: Project Trip Generation of the traffic study, the trip generation rates used "are inclusive of passenger car, delivery vans, and truck traffic." Therefore, trips were included from both employee vehicles, as well as from van deliveries, which generated the higher PCE number noted in your comment. As described in Section 2.2 of the traffic study, different trip distribution patterns were specifically analyzed for vans/cars versus trucks. With respect to Benson and Baseline, as noted in the comment, an improvement has been identified in the IS/MND for this intersection to improve circulation to add another left turn lane onto Baseline. This would result in one left-turn only lane, one left-turn/through lane, and one through/right-turn lane at this intersection. Additionally, the left turn

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	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.	signals at that intersection will be converted to split-phase, allowing all left-turns and through traffic to go at one time, then stop, and let all the left turn and through traffic in the other direction go next. It should be noted that unlike larger trucks that accelerate and decelerate slowly, delivery vans operate in a similar fashion to passenger cars in a mixed traffic stream, and therefore would not slow traffic in the same way that a larger truck would. Additionally, the traffic study also overestimates the trips created by the Project, as it is based on a 276,000 square foot building, and the building was downsized further to only 201,000 square feet since preparation of the traffic study. That's a nearly 28% reduction compared to the building analyzed in the traffic study, therefore the trip generation will likely be even less than what's presented in the traffic study. The applicant will be undergrounding all of the utilities adjacent to all of the Project's Foothill Boulevard driveways, as will be specified in the Project's proposed Development Agreement. The striping of a new bike lane on Foothill Boulevard is beyond the scope of the IS/MND, but could be implemented by the City if desired.
Letter from J. Paul, dated December 20, 2019		
I-3	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 nearby. Their property values are going to	The Project site is located in the Commercial/Industrial Mixed-Use (C/I-MU) zone of the City, and the proposed warehouse therefore is a permitted use for the property. The Project is also consistent with the land uses surrounding the property, which includes Cable Airport and a rock quarry to the north, commercial uses to the south and east, and industrial uses to the west. There are already existing warehouses and industrial uses in the City of Upland, in designated and zoned areas where those uses are appropriate distances from homes, therefore this Project would not be the first of this type of use in the City. Impacts to property values are not a part of the environmental analysis under CEQA. Section 15131(a) of the CEQA Guidelines states that economic or social effects of a project shall not be treated as significant effects on the environment and that the focus of the analysis shall be on

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	"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.	the physical changes taking place. The IS/MND thoroughly analyzed all environmental areas required by the California Environmental Quality Act (CEQA) Guidelines. While tax revenue to the City is outside the scope of the environmental analysis in the IS/MND, the project's proposed Development Agreement provides for an annual contribution for road maintenance, with the term of the contribution to be determined as part of the public review process. This annual contribution would be just part of the project's multi-million dollar financial commitment to the City included in the proposed Development Agreement, and in addition to the $2.5 million in City fees that the project will also be paying. The annual contribution is intended to replicate what the City could theoretically collect in sales tax from a retail project of similar size—however, at this dollar amount, the project's proposed annual contribution is the equivalent of a top 10 sales tax producer for the City. Additionally, while sales tax is variable (and mostly down over the last decade), and retail is generally declining, this would be guaranteed revenue for the City, and, again, would make the project one of the largest revenue sources for the City. Additionally, Bridge's investment in the property and other off-site improvements could expand the City's tax revenue base in the future. The Project will create 300 permanent jobs, and those employees will want to eat and buy goods and services at neighboring stores. Not only will the Project be adding 1,000 new trees and nearly 11 acres of landscaping on the property, but the Project will also be paying for and installing new landscaping, curbs, gutters and sidewalks over approximately 1,000 linear feet of Foothill Boulevard as detailed in the Development Agreement. These improvements will enhance the aesthetics and attractiveness of the street and could make the currently vacant lots on Foothill more attractive to development, including retail. The Project could serve as an economic catalyst for the Foothill Blvd corridor that will have long-lasting tax revenue benefits for the City.
Letter from G. DiGiovanni, dated December 29, 2019		

Comment Number	Comment	Response
I-4	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.	A detailed noise technical analysis was prepared and included in Appendix G of the IS/MND, which analyzed noise from all Project vehicles, including trucks, vans and employee cars. This analysis determined that Project generated roadway noise would not create an audible difference in noise volumes compared to existing conditions. All roadway noise impacts would be less than significant. While new trips would be created, all of the Project's trips – including employee cars, vans, and trucks – would still create less than a third of the traffic generated by retail store(s) the same size as the proposed Project, and would generate far less truck traffic. Therefore, the proposed Project, even including all the Project vans, is a much lower traffic generator than other uses permitted by the zoning for this property. Moreover, the existing rock and gravel processing operations generate dozens of trucks per day to off-haul materials processed onsite as compared to the proposed project's 25 trucks per day. The IS/MND analyzed the potential impacts to public facilities and found the Project would have a less than significant impact. Additionally, in addition to the standard project fees which includes nearly $500,000 for roads (i.e., this is the amount the City collects to pay for new road improvements and maintenance as a result of any new project and it is based on the size and use of the project), the project's Development Agreement includes an annual contribution for road maintenance, with the term of the contribution to be determined as part of the public review process. This annual contribution is intended to replicate what the City could theoretically collect in sales tax from a retail project of similar size—however, at this dollar amount, the project's proposed annual contribution is the equivalent of a top 10 sales tax producer for the City. Additionally, while sales tax is variable (and mostly down over the last decade), and retail is generally declining, this would be guaranteed revenue for the City, and, again, would make the project one of the largest revenue sources for the City.
Letter from I. Osuna, dated December 29, 2019		

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I-5	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.	Economic impacts are not part of the environmental analysis required under CEQA, therefore an Economic Impact Report was not a part of the IS/MND. Section 15131(a) of the CEQA Guidelines states that economic or social effects of a Project shall not be treated as significant effects on the environment and that the focus of the analysis shall be on the physical changes taking place. While economic impacts are outside the scope of the IS/MND, a Development Agreement is part of the project's entitlements which proposes millions of dollars in contributions for the City, in addition to the City's standard development impact fees. These contributions would go towards road maintenance, police, parks, education, local businesses and other civic improvements. Additionally, Bridge's investment in the property and other off-site improvements could expand the City's tax revenue base in the future. The Project will create 300 permanent jobs and these employees will want to eat and buy goods and services at neighboring stores. Not only will the Project be adding 1,000 new trees and nearly 11 acres of landscaping on the property, but the Project will also be paying for and installing new landscaping, curbs, gutters and sidewalks over approximately 1,000 linear feet of Foothill Boulevard as detailed in the Development Agreement. These improvements will enhance the aesthetics and attractiveness of the street, and make the currently vacant lots on Foothill more attractive to development, including retail. The Project could serve as an economic catalyst for the Foothill Blvd corridor that will have long-lasting tax revenue benefits for the City.
Letter from D. Hill, dated December 30, 2020		
I-6	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	The Project site is located in the Commercial/Industrial Mixed-Use (C/I-MU) zone of the City, and the proposed warehouse therefore is a permitted use for the property. The Project is also consistent with the land uses surrounding the property, which includes Cable Airport and a rock quarry to the north, commercial uses to the south and east, and industrial uses to the west. There are already existing warehouses and industrial uses

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	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 proposal. Why not? Is the City only looking for some "fast" money. 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.	in the City of Upland, in designated and zoned areas where those uses are appropriate distances from homes, therefore this Project would not be the first of this type of use in the City. The IS/MND thoroughly analyzed all environmental impacts required by the CEQA Guidelines according to objective thresholds and criteria, and determined that the Project would result in no significant impacts after mitigation; impacts to transportation, air quality and noise would be mitigated to a less than significant level. Trucks would not generate significant noise given that there would be maximum of 5 trucks during the day, with a limit of 25 trucks daily. Moreover, the existing rock and gravel processing operations generate dozens of trucks per day to off-haul materials processed onsite as compared to the proposed project's 25 trucks per day. While tax revenue to the City is outside the scope of the environmental analysis in the IS/MND, the project's proposed Development Agreement provides for an annual contribution for road maintenance, with the term of the contribution to be determined as part of the public review process. This annual contribution would be just part of the project's multi-million dollar financial commitment to the City included in the proposed Development Agreement, and in addition to the $2.5 million in City fees that the project will also be paying. The annual contribution is intended to replicate what the City could theoretically collect in sales tax from a retail project of similar size—however, at this dollar amount, the project's proposed annual contribution is the equivalent of a top 10 sales tax producer for the City. Additionally, while sales tax is variable (and mostly down over the last decade), and retail is generally declining, this would be guaranteed revenue for the City, and, again, would make the project one of the largest revenue sources for the City. Additionally, Bridge's investment in the property and other off-site improvements could expand the City's tax revenue base in the future. The project will create 300 permanent jobs and these employees will want to eat and buy goods and services at neighboring stores. Not only will the Project be adding 1,000 new trees and nearly 11 acres of landscaping on the property, but the Project will also be paying for and installing new

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		landscaping, curbs, gutters and sidewalks over approximately 1,000 linear feet of Foothill Boulevard as detailed in the Development Agreement. These improvements will enhance the aesthetics and attractiveness of the street and could make the currently vacant lots on Foothill more attractive to development, including retail. The Project could serve as an economic catalyst for the Foothill Blvd corridor that will have long-lasting tax revenue benefits for the City.
Letter from S. Dacharux, dated December 30, 2019		
I-7	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.	The Project site is located in the Commercial/Industrial Mixed-Use (C/I-MU) zone of the City, and the proposed warehouse therefore is a permitted use for the property. The Project is also consistent with the land uses surrounding the property, which includes Cable Airport and a rock quarry to the north, commercial uses to the south and east, and industrial uses to the west. There are already existing warehouses and industrial uses in the City of Upland, in designated and zoned areas where those uses are appropriate distances from homes, therefore this Project would not be the first of this type of use in the City. To correct one point, the project does not include 1,000 loading doors. The Project proposed by the Applicant and analyzed in the IS/MND would include 16 dock-hi doors for trucks, and 8 van loading doors on each of the northern and southern building frontages. Additionally, the Project would be limited to 25 daily trucks, with only 5 trucks during the daytime. This is less than the existing rock and gravel processing operations, which generates dozens of trucks per day to off-haul materials processed onsite. While new trips would be created, all of the Project's trips – including employee cars, vans, and trucks – would still create less than a third of the traffic generated by retail and grocery stores like Whole Foots the same size as the proposed Project, and would generate far less truck traffic. Therefore the proposed Project, even including all the Project vans, is a much lower traffic generator than other uses permitted by the zoning for this property.

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		While tax revenue to the City is outside the scope of the environmental analysis in the IS/MND, the project's proposed Development Agreement provides for an annual contribution for road maintenance, with the term of the contribution to be determined as part of the public review process. This annual contribution would be just part of the project's multi-million dollar financial commitment to the City included in the proposed Development Agreement, and in addition to the $2.5 million in City fees that the project will also be paying. The annual contribution is intended to replicate what the City could theoretically collect in sales tax from a retail project of similar size—however, at this dollar amount, the project's proposed annual contribution is the equivalent of a top 10 sales tax producer for the City. Additionally, while sales tax is variable (and mostly down over the last decade), and retail is generally declining, this would be guaranteed revenue for the City, and, again, would make the project one of the largest revenue sources for the City. Additionally, Bridge's investment in the property and other off-site improvements could expand the City's tax revenue base in the future. The project will create 300 permanent jobs and these employees will want to eat and buy goods and services at neighboring stores. Not only will the Project be adding 1,000 new trees and nearly 11 acres of landscaping on the property, but the Project will also be paying for and installing new landscaping, curbs, gutters and sidewalks over approximately 1,000 linear feet of Foothill Boulevard as detailed in the Development Agreement. These improvements will enhance the aesthetics and attractiveness of the street and could make the currently vacant lots on Foothill more attractive to development, including retail. The Project could serve as an economic catalyst for the Foothill Blvd corridor that will have long-lasting tax revenue benefits for the City.
Letter from S. Patterson, dated January 1, 2020		
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,	The Project site is located in the Commercial/Industrial Mixed-Use (C/I-MU) zone of the City, and the proposed warehouse is therefore a permitted use for the property. The Project is also consistent with the land uses surrounding the property, which includes Cable Airport and a rock

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	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	quarry to the north, commercial uses to the south and east, and industrial uses to the west. There are already existing warehouses and industrial uses in the City of Upland, in designated and zoned areas where those uses are appropriate distances from homes, therefore this Project would not be the first of this type of use in the City. As the commenter noted, the project site is located in an area "which is currently a combination of light industrial and commercial enterprises." Chapter 1 of the IS/MND explained that the project would result in a less than significant impact to aesthetics and would therefore not result in a dramatic change in the neighborhood ambiance. The IS/MND thoroughly analyzed all thresholds required by the CEQA Guidelines and determined that the Project would result in no significant impacts after mitigation; impacts to traffic and noise would be mitigated to a less than significant level. As the commenter describes, based on prior community feedback the building square footage and the number of truck trips has been greatly reduced and Project operations were modified to result in a majority of truck trips occurring overnight. As discussed in the IS/MND and traffic study prepared for the Project (Appendix H-1), the Project would result in a maximum of 5 trucks during daytime hours, resulting in a reduction from current conditions. The number of trips expected to result from the Project was assessed as a part of the traffic analysis and accounted for the trucks, vans, and passenger cars anticipated to utilize the Project. The commenter is correct that a total of 25 trucks would arrive to the facility daily (for a total of 50 truck trips) (see page 95 of the IS/MND) and the impacts of these truck trips were analyzed in the IS/MND. For reference, the existing rock and gravel processing operations generate dozens of trucks per day to off-haul materials processed onsite. Impacts to transportation were determined to be less than significant with the incorporation of mitigation. The traffic study analysis for the Opening Year (2020) scenario includes 44 cumulative projects which were determined by City staff and development activity from the cities of Claremont and Montclair. As shown in Figure 9 and Table C of the Traffic Impact Analysis (Appendix H-1 of the IS/MND), approved residential developments that will be constructed southwest of the Project site, along Foothill Boulevard between Benson Avenue and

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	Gracious Living.	Claremont Boulevard, were included in the analysis. These residential projects are not across the street from the proposed project. Additionally, the traffic study also overestimates the trips created by the Project, as it is based on a 276,000 square foot building, and the building was downsized further to only 201,000 square feet since preparation of the traffic study. That's a nearly 28% reduction compared to the building analyzed in the traffic study, therefore the trip generation will likely be even less than what's presented in the traffic study. A detailed noise technical analysis was prepared and included in Appendix G of the IS/MND, which analyzed noise from all Project vehicles, including trucks, vans and employee cars. This analysis determined that Project generated roadway noise would not create an audible difference in noise volumes compared to existing conditions. All roadway noise impacts would be less than significant. Nighttime noise levels were considered and included in the analysis; in fact, the traffic noise analysis used a 24-hour noise metric that accounts for noise sensitivity during evening and nighttime hours. While tax revenue to the City is outside the scope of the environmental analysis in the IS/MND, the project's proposed Development Agreement provides for an annual contribution for road maintenance, with the term of the contribution to be determined as part of the public review process. This annual contribution would be just part of the project's multi-million dollar financial commitment to the City included in the proposed Development Agreement, and in addition to the $2.5 million in City fees that the project will also be paying. The annual contribution is intended to replicate what the City could theoretically collect in sales tax from a retail project of similar size—however, at this dollar amount, the project's proposed annual contribution is the equivalent of a top 10 sales tax producer for the City. Additionally, while sales tax is variable (and mostly down over the last decade), and retail is generally declining, this would be guaranteed revenue for the City, and, again, would make the project one of the largest revenue sources for the City. Additionally, Bridge's investment in the property and other off-site improvements could expand the City's tax revenue base in the future. The

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		Project will create 300 permanent jobs and these employees who will want to eat and buy goods and services at neighboring stores. Not only will the Project be adding 1,000 new trees and nearly 11 acres of landscaping on the property, but the Project will also be paying for and installing new landscaping, curbs, gutters and sidewalks over approximately 1,000 linear feet of Foothill Boulevard as detailed in the Development Agreement. These improvements will enhance the aesthetics and attractiveness of the street and could make the currently vacant lots on Foothill more attractive to development, including retail. The Project could serve as an economic catalyst for the Foothill Blvd corridor that will have long-lasting tax revenue benefits for the City.
Letter from S. Bierbaum, dated December 22, 2019		
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 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 the D1 Community members and Upland Residents, but will NOT SHARE WHO THE RESPONSES CAME FROM. That is my word.	Detailed technical studies analyzing the potential environmental impacts of the proposed Project determined that all impacts would be less than significant either before or after mitigation, therefore an IS/MND is the appropriate environmental document consistent with CEQA, and an EIR is not required. Nonetheless, all of the technical studies included in the Project's IS/MND are the exact same technical studies that would have been included in an EIR. Each study's level of detail and thorough, comprehensive analysis is the same between this Project's IS/MND and an EIR. The only technical analysis that would have been in an EIR, that is not in an IS/MND, is an evaluation of alternatives to the Project. Therefore, there is no project-specific analysis that is missing from this IS/MND which would have been included in an EIR for the Project. The comment does not raise any issues or address the adequacy of the IS/MND, and thus no further response is needed.

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	I hope that you care enough to consider this, even if your mind is made up. Let's be real and honest…..Please.	
Letter from A. King, dated January 4, 2020		
I-10	Letter from G. DiGiovanni, dated December 29, 2019	Kimley-Horn contacted the commenter on January 14, 2020, to inform them that the City is not able to access the link on the Nextdoor website and suggested they re-submit their comment via email. The Commenter confirmed receipt of the email suggesting re-submittal of the comment on January 14, 2020. A re-submitted comment has not been received to date.
Letter from J. Dowdall, dated January 4, 2020		
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	The City Councilmembers will be the decision-makers on this Project and its entitlements, not City staff. Additionally, the Project site is located in the Commercial/Industrial Mixed-Use (C/I-MU) zone of the City, and the proposed warehouse is therefore a permitted use for the property. The Project is also consistent with the land uses surrounding the property, which includes Cable Airport and a rock quarry to the north, commercial uses to the south and east, and industrial uses to the west. There are already existing warehouses and industrial uses in the City of Upland, in designated and zoned areas where those uses are appropriate distances from homes, therefore this Project would not be the first of this type of use in the City. While economic impacts are outside the scope of the IS/MND, a Development Agreement is part of the project's entitlements which proposes millions of dollars in contributions for the City, in addition to the City's standard development impact fees. These contributions would go towards road maintenance, police, parks, education, local businesses and other civic improvements. Additionally, Bridge's investment in the property and other off-site improvements could expand the City's tax revenue base in the future. The project will create 300 permanent jobs and these employees will want to eat and buy goods and services at neighboring stores. Not only will the Project be adding 1,000 new trees and nearly 11 acres of landscaping on

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	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 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.	the property, but the Project will also be paying for and installing new landscaping, curbs, gutters and sidewalks over approximately 1,000 linear feet of Foothill Boulevard as detailed in the Development Agreement. These improvements will enhance the aesthetics and attractiveness of the street and could make the currently vacant lots on Foothill more attractive to development, including retail. The Project could serve as an economic catalyst for the Foothill Blvd corridor that will have long-lasting tax revenue benefits for the City. The IS/MND thoroughly analyzed all potential environmental impacts as required by the CEQA Guidelines and determined that the Project would result in less significant impacts after mitigation; impacts to traffic and noise would be mitigated to a less than significant level.
Letter from S. Bierbaum, dated January 7, 2020		
I-12	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>	The financial commitments detailed in the Development Agreement are not a part of, and outside the scope of, the environmental analysis contained in the IS/MND. However, the Development Agreement will require approval by the City Council as part of the Project's entitlements. The comment does not raise any issues or address the adequacy of the IS/MND, and thus no further response is needed.

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	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) 5. 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 respectfully request that someone, be prepared to provide feedback Thursday to share with the Community at this meeting.	
Letter from G. Jensen, dated January 8, 2020		
I-13	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	The IS/MND analyzed the utilities that would be impacted by the proposed Project. The extension or improvements of utilities to properties other

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	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.	than the proposed Project were not evaluated as a part of the proposed Project. Central Avenue will remain a public road, and the Project driveway accessing Central Avenue will remain private property.
Letter from L. Hocking, dated January 9, 2020		
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 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."	A detailed noise technical analysis was prepared and included in Appendix G of the IS/MND, which analyzed noise from all Project vehicles, including trucks, vans and employee cars. This analysis determined that Project generated roadway noise would not create an audible difference in noise volumes compared to existing conditions. All roadway noise impacts would be less than significant. Air quality and noise impacts were also thorough analyzed and determined to be less than significant after mitigation. Nighttime noise levels were considered and included in the analysis; in fact, the traffic noise analysis used a 24-hour noise metric that. Additionally, while new trips and associated emissions would be created, all of the Project's trips – including employee cars, vans, and trucks – would still create less than a third of the traffic generated by retail store(s) the same size as the proposed Project, and would generate far less truck traffic. Therefore, the proposed Project, even including all the Project vans, is a much lower traffic generator than other uses permitted by the zoning for this property. While tax revenue to the City is outside the scope of the environmental analysis in the IS/MND, the project's proposed Development Agreement

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		provides for an annual contribution for road maintenance, with the term of the contribution to be determined as part of the public review process. This annual contribution would be just part of the project's multi-million dollar financial commitment to the City included in the proposed Development Agreement, and in addition to the $2.5 million in City fees that the project will also be paying. The annual contribution is intended to replicate what the City could theoretically collect in sales tax from a retail project of similar size—however, at this dollar amount, the project's proposed annual contribution is the equivalent of a top 10 sales tax producer for the City. Additionally, while sales tax is variable (and mostly down over the last decade), and retail is generally declining, this would be guaranteed revenue for the City, and, again, would make the project one of the largest revenue sources for the City.
Comments made in person at the City Council, Planning Commission, and Airport Land Use Committee (January 9, 2020)		
Steve Bierbaum		
I-15	I want to first go on record as saying that I have attempted personally on many occasions to communicate with the City Council, with the Planning Commission and to the developmental services staff on this. And on three separate occasions via email I have received zero response, none whatsoever. The first was on December 22nd, I asked about what would it take for this not to go through, basically asking about if we gathered signatures, what would it take for the City to say from the citizens that this isn't going to work. I received zero response. On December 30th I contacted the City, the same people that I've already previously mentioned and said that we're supposed to be receiving 2 million dollars in future road maintenance from Bridge Development as part of this project. My question was simply is that 2 million dollars supposed to go into the General Fund or into public works, or is that 2 million dollars part of the calculated improvement to 13th Street and Benson in front of Cable Airport? No response. That being said, I want to make sure, and I've already sent and received no response, that this is my official notice of opposition to the Bridge project. It has nothing to do with	The Project is being reviewed in accordance with the existing City development review process. Per the CEQA Guidelines, the Project analysis analyzes 20 resource categories. Financial contributions are not part of the environmental impacts analyzed under CEQA and are therefore out of the scope of the IS/MND analysis. However, the IS/MND evaluates the potential impacts to public facilities and found the Project to have a less than significant impact. Furthermore, the City requires that all new development pay Development Impact Fees in order to offset impacts associated with increasing the City's demand for public services. While economic impacts are outside the scope of the IS/MND, a Development Agreement is part of the project's entitlements which proposes millions of dollars in contributions for the City, in addition to the City's standard development impact fees. These contributions would go towards road maintenance, police, parks, education, local businesses and other civic improvements. Detailed technical studies analyzing the potential environmental impacts of the proposed Project determined that all impacts would be less than

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	Bridge. I absolutely believe that that development should be that site should be developed; however, I'm opposed to it being developed in this manner because over the past two years I've seen quite frankly how the City has operated, the position that they've taken, the direction that they've taken in making sure that this particular development moves forward. They've been aware of it, the illegal operations that have occurred, the deals that were made two years ago over this. Subsequent deals over a year and a half ago to provide easements from the west end water to Bridge Development, actually they didn't go to Bridge Development, they went specifically to Giovanni, and then subsequent to that my own personal observations of the illegal operations that have been occurring on Airport Drive and the Giovanni site, and what breaks my heart is to continue -- I can tell everybody here who's sitting here watching I absolutely can prove by documentation, video and photographs that the City was aware of illegal operations being the um of dirt onto that site which did not discontinue until San Bernardino County Environmental Health got involved, yet there's an MND that we're supposed to just accept and move on when there's all these new projects going on the west end of the City. Okay. Numerous projects. Industrial buildings being built, educate yourself. New residential complexes. I'm not against Bridge Development, please ensure that you request an EIR on this. Thank you.	significant either before or after mitigation, therefore an IS/MND is the appropriate environmental document consistent with CEQA, and an EIR is not required. The technical studies included a Phase I Environmental Site Assessment that was prepared for the Project site by Ardent Environmental in May 2018 and according to that report, there was no Recognized Environmental Condition (REC)s (as defined by ASTM Practice E 1527- 13) identified in association with the Project site that required additional investigation. Furthermore, prior operations on the site are not part of the proposed project and therefore outside the scope of CEQA and the project IS/MND. Nonetheless, all of the technical studies included in the Project's IS/MND are the exact same technical studies that would have been included in an EIR. Each study's level of detail and thorough, comprehensive analysis is the same between this Project's IS/MND and an EIR. The studies show that all potential impacts are reduced to less than significant. Under CEQA, the only additional analysis that an EIR requires is an alternatives analysis to consider whether there are any alternatives that would reduce impacts that cannot be mitigated to less than significant. Here, because there are no significant impacts, CEQA does not require an alternatives analysis to try to reduce impacts.
Ray Musser		
I-16	I was the one that brought this project to Marty Theo back in 2016. It wasn't in this form. We sent it to - we called in Majestic Realty, the largest financial real estate firm in America, private is the key word, and they did a pass on this project. Then it went to Lewis Group and they did a pass. And now we have Bridge and there might have been a player there between there, I don't know for sure, but what we tried to do, and I don't quite see all of it here, I do see 370,000 annually coming here according to the brochure I received as I walked in, that helps a lot, that's a whole lot better than zero.	Comment in support of the Project is noted. While tax revenue to the City is outside the scope of the environmental analysis in the IS/MND, the project's proposed Development Agreement provides for an annual contribution for road maintenance, with the term of the contribution to be determined as part of the public review process. This annual contribution would be just part of the project's multi-million dollar financial commitment to the City included in the proposed Development Agreement, and in addition to the $2.5 million in City fees that the project will also be paying. The annual contribution is intended to replicate what the City could theoretically collect in sales tax from a retail

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	We have a firm in the City that has 33 other locations and is doing a building right here in Upland. We get the tax base on all 33 of those. And I'm not going to mention the name but that's happening. I just talked to them about a month ago and said is it still a thing? They said yeah, we have a bid for - I think it's this area and it may run out. That's what we should do. If we're selling something or moving it to sale, it ought to be taxed and that's exactly what's happened to this other firm. This other firm, when you say 33 - it's unbelievable. They're our third and fourth highest sales tax, independent what data are you looking at. That's huge. You put two Home Depots together and it can't match that. So I would say I don't know a better project. I walked with this project with Howard and when it had a lot of homeless people up there, I should never be with the tumble weeds, I close up real fast, but here was a gang group, he was here was an alcoholic group, and here was a drug group, all different camps. I'm saying this is much better than what we have. This is good and if we can just get more sales tax every year, because Upland is rich in profit but cash poor; so the more we can drive this to get sales tax every year in that direction is what I would see to be improved on this project.	project of similar size—however, at this dollar amount, the project's proposed annual contribution is the equivalent of a top 10 sales tax producer for the City. Additionally, while sales tax is variable (and mostly down over the last decade), and retail is generally declining, this would be guaranteed revenue for the City, and, again, would make the project one of the largest revenue sources for the City.
Eric Reese		
I-17	My suggestion would be for the City to partner with the developer and consider the use of porous reflective pavements as approved for the material for the proposed project. Inserting porous reflective pavements would help enhance environmental mitigations, will also help in reduce costs for the City and the developer. Porous pavements can reduce paving surface temperature by up to 11 degrees Fahrenheit, therefore helping to provide for reduced air conditioning which results in lower energy costs and reduced air pollution. Porous reflective pavements can reduce noise levels by nearby sources by up to 6 decibels, which pour reflective pavement can also recharge * by	The applicant is open to considering porous reflective pavement for the site, however this type of material often breaks down and deteriorates faster than traditional concrete and therefore is not a sustainable solution. Concrete is also more reflective than asphalt, therefore the Project's use of concrete will help reduce surface temperatures over traditional asphalt. As explained in Chapter 10 of the IS/MND, the project as proposed will comply with state and federal clean water standards and will construct underground infiltration retention systems, which would retain and treat water prior to discharging into the public storm drain system.

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	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 the stormwater into the ground which allows the developer to use this water for landscaping and irrigation purposes. This helps tremendously to 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 help filter out stir material, 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 they're able to handle extreme temperatures and **. This decreases pavement cracks and all that occur from pavement stress., resulting in reduced costs to repair and replace worn-out pavements. I highly recommend the City to partner with the development looking into porous reflective pavements as they could help the developer and the City be better stewards to the environmental impact that will use its own roads in the future.	Additionally, the new impervious paving on site would drain to underground infiltration retention systems, which would retain and treat water prior to discharging into the public storm drain system. Therefore, due to the onsite subterranean infiltration and direction of flows to allow for groundwater recharge, the proposed Project would not significantly impact local groundwater recharge or impede sustainable groundwater management of the basin.
Mark Walters		
I-18	A cost-benefit analysis, CBA, is the process used to measure the benefits of a decision minus the costs associated with this decision. I've been doing some brief calculations to help me understand this development and associated CBAs. Bridge Development states this unknown company's vehicles which include semi-trucks, vans and cars, will only be using Baseline Road, Basin Avenue, Foothill Boulevard, and Central Avenue to access their facility. Using my calculations it has been determined that these four roadways are	Potential impacts to infrastructure and public services were fully analyzed in the IS/MND and impacts were determined to be less than significant. While financial commitments are outside the environmental impacts analyzed under CEQA, the Project will be contributing funds for roadway repairs. With regard to road maintenance, in addition to the standard project fees which includes nearly $500,000 for roads (i.e., this is the amount the City collects to pay for new road improvements and maintenance as a result of any new project and it is based on the size and use of the project), the project's Development Agreement includes an

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	24,051 feet long, or in other words 4.55 miles long. Using the national average it costs 1.25 million dollars per mile to repave a roadway. To repave this designated roadway that they're going to be using on a one-time only event, it will cost the City of Upland $5,687,500. Also using national averages on a heavily traveled roadway, you can expect the need to repave these roadways every 10 to 15 years. Being a 50-year lease and using the national average, the City of Upland will spend $22,750,000 out of Upland's General Fund to maintain these designated roadways. Please keep in mind this does not include inflationary costs nor does it include lane striping, Botts' dots, or intersection sensors. Since our city is already broke we will obviously need to cut costs. Are we going to cut our city staff? Are we going to cut our police staff? Are we going to quit trimming trees? Are we going to shut down the library? Are we going to close out parks down? Will we have to do all of the above? Based on the above cost-benefit analysis, this project will cost the City of Upland way more than the benefit and I recommend you vote no to this potentially city-bankrupting project.	annual contribution for road maintenance, with the term of the contribution to be determined as part of the public review process. This annual contribution is intended to replicate what the City could theoretically collect in sales tax from a retail project of similar size—however, at this dollar amount, the project's proposed annual contribution is the equivalent of a top 10 sales tax producer for the City. Additionally, while sales tax is variable (and mostly down over the last decade), and retail is generally declining, this would be guaranteed revenue for the City, and, again, would make the project one of the largest revenue sources for the City. With regard to road maintenance, in addition to the standard project fees which includes nearly $500,000 for roads (i.e., this is the amount the City collects to pay for new road improvements and maintenance as a result of any new project and it is based on the size and use of the project), the project's Development Agreement includes an annual contribution for road maintenance, with the term of the contribution to be determined as part of the public review process. This annual contribution is intended to replicate what the City could theoretically collect in sales tax from a retail project of similar size—however, at this dollar amount, the project's proposed annual contribution is the equivalent of a top 10 sales tax producer for the City. Additionally, while sales tax is variable (and mostly down over the last decade), and retail is generally declining, this would be guaranteed revenue for the City, and, again, would make the project one of the largest revenue sources for the City.
Irmalinda Osuna		
I-19	Again, I'm a 60-year resident, and I'm also the mother of two college-age and bound boys, one is not, he's trying to find his way and trying to find a good living wage job. And the reason I bring this up is because two months ago when I came forth in front of the Planning Commission I expressed my concern that having Amazon in our city would -- is very concerning for me. If you look at the history over the years, Amazon has a very bad reputation. This is why they - their name is not disclosed in this plan and many of the	No tenant has been identified for this Project and the tenant's identity is outside the scope of the environmental analysis under CEQA. The scope of the City's Municipal Code does not provide authority for the City to determine or review the choice of tenant that may occupy the building. *Friends of Davis v. City of Davis* (2000) 83 Cal.App.4th 1004, 1013-14. Any tenant that operates the proposed building will be required to abide by all mitigation measures, conditions of approval, and commitments made in the Development Agreement adopted for this Project, and be consistent

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	other plans you see in Inland Empire. So with that the reason why is because they pay poverty wages. Kay? They are - they pour millions of dollars in cities who implement these policy decisions and I'm just very concerned that you know this is -- this -- this -- the president of this company and it's not a very popular company. But I'm here to announce that we are having a grass roots community workshop on Saturday and the reason why is because then just two months after I spoke, we a recent report came out from the current roundtable, it's a scathing report, fact-based highly researched report, very comprehensive that talks about the actual economic impact as a result of Amazon's footprint in our community, especially in Inland Empire. And it's very important that we educate the community just to give you a little bit of a preview, Amazon is actually benefited from public subsidies. We, the taxpayers, are subsidizing their employees. Now keep in mind this is a 900 dollar -- 900-billlion-dollar company and they are really taking full advantage of the public subsidies and this is why they are monopolizing and really just diving into eCommerce. So it's very important that we educate our community and in this slide here we're going to have an expert, this person who was part of this study, to talk about the actual impact. And, again, this is a social impact. And then we're going to talk -- we are going to have some talk about the environmental impact and be able to quantify what is the implication for Upland. And so we need to be able to look at the cost-benefit analysis as Mark mentioned and really do a deep dive in and make sure that at the end of it all when we look at the studies, the information, that we work with Bridge Development to formalize a community benefit agreement. This is where we're going to sit down and make sure that we can mitigate those costs. I know that Bridge has been doing that with Community commercial, with other departments. I know that Bridge Development would be willing to work with us, the grassroots community to formalize a community benefit	with the environmental analysis contained in the IS/MND. No economic subsidies from the City have been requested as part of this Project, in fact the Project will be making millions of dollars in financial contributions to the City. While economic impacts are outside the scope of the IS/MND, a Development Agreement is part of the project's entitlements which proposes millions of dollars in contributions for the City, in addition to the City's standard development impact fees. These contributions would go towards road maintenance, police, parks, education, local businesses and other civic improvements. Additionally, Bridge's investment in the property and other off-site improvements could expand the City's tax revenue base in the future. The project will create 300 permanent jobs and these employees will want to eat and buy goods and services at neighboring stores. Not only will the Project be adding 1,000 new trees and nearly 11 acres of landscaping on the property, but the Project will also be paying for and installing new landscaping, curbs, gutters and sidewalks over approximately 1,000 linear feet of Foothill Boulevard as detailed in the Development Agreement. These improvements will enhance the aesthetics and attractiveness of the street and could make the currently vacant lots on Foothill more attractive to development, including retail. The Project could serve as an economic catalyst for the Foothill Blvd corridor that will have long-lasting tax revenue benefits for the City.

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	agreement.	
Roger Stephenson		
I-20	Okay. So first thing, the project description. The building is smaller now, almost a third smaller but the activity level hasn't decreased. There will be highly active loading areas on either side, the north and south side. Those areas should be included within the overall square footage of the building when you're figuring things like parking and employee and other area rented -- excuse me, area-related stuff. So the square footage should really be up around 300,000 or more square feet. Careful reading of the Upland General Plan, look at the zoning for the proposed site, you read that, it says limited warehousinghow that sentence works out. Down on the south side of Foothill for the -- the College Heights area it specifically says warehousing and distribution. Okay. So the General Plan is based on a distinction between limited warehousing and warehousing and distribution. And on that basis the proposed site doesn't meet the General Plan. And that finding -- also that indicates it's incompatible, well, it might be compatible but that does not mean it meets the zoning requiremen.t In terms of traffic impact analysis, which is a -- a big element of the initial study, the existing traffic impact analysis did not adequately represent the traffic that would result from this particular facility and that's both in total trips and more importantly the hourly distribution of travel to and from the facility. The Institute of Transportation Engineers land use classification that they use was developed that are different in character than what is being proposed here as a van delivery center; so therefore the data that they used isn't appropriate and so therefore the results of the transportation analysis, including any recommended road improvements or whatever, aren't valid. And then the last thing I want to make a comment on, the -- retail analysis	The traffic study's analysis is based on an approved methodology applied consistently to all commercial and industrial projects which bases trip generation on a building's square footage. The Project's square footage represents the total capacity of storage within the warehouse building, which is the limiting factor in determining how many goods can travel into and out of the facility, and therefore the trips generated by a project. The loading and parking areas provided by the project comply with all applicable zoning ordinances. The traffic study used the ITE Trip Generation rate for "High-Cube Parcel Hub Warehouse", which is a package delivery type land use, consistent with the proposed use. A High Cube Parcel Hub warehouse reflects delivery/shipping facilities like UPS and FedEx which are engaged in package delivery directly to customers. This is the closest approximation to a Last Mile warehouse like the one proposed by the project. This ITE rate included trips generated by all Project-related vehicles, including trucks, vans, and employee cars traveling to and from the site. The traffic study also looked at traffic generated during the peak hours of the day, meaning the hour in the morning and hour in the afternoon when the greatest number of cars are on the road. The traffic study was completed consistent with all adopted methodology and guidelines. Additionally, the traffic study also overestimates the trips created by the Project, as it is based on a 276,000 square foot building, and the building was downsized further to only 201,000 square feet since preparation of the traffic study. That's a nearly 28% reduction compared to the building analyzed in the traffic study, therefore the trip generation will likely be even less than what's presented in the traffic study. The retail analysis was included in the IS/MND for comparison purposes, as retail is a permitted use within the site's zoning. The Project would generate less than a third of the traffic generated by retail store(s) the same size as the proposed Project, and would generate far less truck

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	memorandum. Well, that's got nothing to do with anything. That site isn't zoned that way and I think it was put in there as a diversion from doing what is needed, which is look at the details of the project.	traffic. Therefore the proposed Project, even including all the Project vans, is a much lower traffic generator than other uses permitted by the zoning for this property. The Project is a warehouse facility consistent with Section 17.51.010 of the City's Municipal Code which Code defines warehousing as the provision of facilities used primarily for the storage of commercial goods, including documents. The Project is located within the C/I-MU zone. Uses supported under this category include commercial and industrial and Section 17.05.020 of the City's Municipal Code identifies warehousing as a permitted use within the C/I-MU zone. Distribution is not a defined land use within the City's Municipal Code. The General Plan is consistent with the Municipal Code and identifies that warehousing is an allowable use within the C/I-MU zone. The Project is also consistent the General Plan's description of the C/I-MU zone as follows: "The Commercial/Industrial Mixed-Use designation is **designed to accommodate a variety of industrial** and regional retail uses and to support commercial activities to satisfy a range of shopping needs for residents of the community. **It is also intended to encourage development of business in the City and to maximize the potential for job generation.** Uses supported under this category include commercial and industrial. **Typical industrial uses could include limited general industrial, manufacturing, assembly, warehousing, multi-tenant industrial, research and development, and airport–related uses**. Typical commercial uses include retail commercial and durable sales goods, tourist-related commercial, entertainment, recreational uses, administrative and professional offices, commercial activities, business support services, food and institutional uses, as well as residential, subject to a reasonable minimum increment of land area as well as a special use permit process." (emphasis added) The Project is also consistent with the following General Plan policy of the City: "Policy LU-3.2 Economic Revitalization. Promote the development of vacant and underutilized parcels with higher intensity commercial and

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		industrial land uses."
Carl Bunch		
I-21	There's three points I want to make. The first being that if another some reason this goes through I think that median on Foothill must be constructed so that there's no traffic that could access those two access points on fruit hill that they're planning on, because that would just be a mad house if you had vans cutting across Foothill right there at Central to get into the access, which you know they will, because who knows what percentage of these drivers are not going to be Amazon employees, they're going to be independent contractor. So if for some reason it about goes through please construct a median so that you cannot access the not side from the south side of Foothill. The second thing is again if this goes through, we must have specific financial penalties in -- in the conditional use permit or whatever the contract is. If or when Amazon exceeds the truck and delivery trip total, because they're telling us it's a certain amount right now, fine. When they exceed that, what are their financial penalties going to be and how do we collect? Because we certainly should if they're telling us it's one thing and of course it's going to be more. It would be very easy to have a couple of police cadets you have there counting trucks and vans and like hey oh, you guys are double what you said you were going to be; so let's get that in writing so 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 They only have they don't have to send it out to any city. The moment says okay everything? This warehouse	A median will be constructed as part of the Project, as documented in the Project's Development Agreement, which will ensure that access is restricted along Foothill Boulevard to right-in and right-out. A tenant has not yet been identified for the Project, and the scope of the City's Municipal Code does not provide authority for the City to determine or review the choice of tenant that may occupy the building. *Friends of Davis v. City of Davis* (2000) 83 Cal.App.4th 1004, 1013-14. However any operator of the Project will be required to be consistent with the environmental analysis contained in the IS/MND and comply with all mitigation measures, conditions of approval, and commitments in the adopted Development Agreement and entitlements. Furthermore, the Applicant has agreed to enforceable Conditions of Approval that would limit the Project trucks to a maximum of 5 during the daytime, and 25 in total per day. The proposed project will only be generating 25 trucks a day, which is considerably less than the number of trucks that would be generated by a same-size retail building on the site, and considerably less than the dozens of trucks per day generated by the existing rock and gravel processing operations. The point of sale designation is outside the scope of the environmental analysis required under CEQA. While tax revenue to the City is outside the scope of the environmental analysis in the IS/MND, the project's proposed Development Agreement provides for an annual contribution for road maintenance, with the term of the contribution to be determined as part of the public review process. This annual contribution would be just part of the project's multi-million dollar financial commitment to the City included in the proposed Development Agreement, and in addition to the $2.5 million in City fees that the project will also be paying. The annual contribution is intended to replicate what the City could theoretically collect in sales tax from a retail project of similar size—however, at this dollar amount, the project's

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	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 San Bernardino we'll designate this as a point of sale but you kick us back half of the sales tax or whatever the percentage was and San Bernardino is like, okay, it's free money to us we'll do that. And that's what we've done subsequently in all the other warehouses, some of them, no, ma'am not. But I don't think we should ever enter into a contract and we should make that specifically they have to do that. They have to designate everything in there Upland point of sale, then we would get our revenue that we need and then it would be okay. If -- you know, the rest of the City wanted it.	proposed annual contribution is the equivalent of a top 10 sales tax producer for the City. Additionally, while sales tax is variable (and mostly down over the last decade), and retail is generally declining, this would be guaranteed revenue for the City, and, again, would make the project one of the largest revenue sources for the City.
Leland Marks		
I-22	I live on 13th Street and I've seen the traffic congestion. I don't have any real technical situation set up because I just heard about this meeting yesterday. But I came here mainly to talk about -- I've been here since 1978. I've been hearing and seeing what's happening to the City for over 40 years. And the street itself, when the police station was put in 25 or so years ago, the prior department, the county workers. The impact of that, the school on 13th Street, the amount of traffic, I live on 13th Street and I can't even get out of my driveway most of the time or I get ran over. Now I don't know what, you know, a lot of these people have come up with very good scenarios in what's going on for the impact and so forth. But basically I came up here to speak about the people who have to live with this traffic, this horrendous. That's why the 210 freeway was put in. I was in here long before the 210 freeway. I was here when 16th Street was the end. Now you got Foothill getting as bad as it has ever been. And with all the impact of Amazon building this facility and the impact of the traffic just for what they're going to do, not counting what we already have, we have a tremendous amount of traffic, and you come down Foothill Boulevard in the evening and you're back down to the San Antonio	The Project site is located in the Commercial/Industrial Mixed-Use (C/I-MU) zone of the City, and the proposed warehouse is therefore a permitted use for the property. The Project is also consistent with the land uses surrounding the property, which includes Cable Airport and a rock quarry to the north, commercial uses to the south and east, and industrial uses to the west. There are already existing warehouses and industrial uses in the City of Upland, in designated and zoned areas where those uses are appropriate distances from homes, therefore this Project would not be the first of this type of use in the City. To correct a mis-statement, the proposed project is not a 50-acre warehouse. The project proposes to develop a 201,096 square feet building on a 50 acre site. Approximately 191,096 square feet of the building would be warehouse/parcel delivery uses and 10,000 square feet would be office/retail uses. A full traffic analysis was prepared for the Project which determined that all impacts at local intersections would be less than significant after mitigation. Even with all of the Project-related vehicles, including trucks, vans and employee vehicles, during the peak hours (i.e. when the greatest number of cars are on the road in both the morning and afternoon), the

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	waiting to get to Euclid just to get across the street. This is going to be madness and all the people who have to live here are impacted. Think about the persons and the people who live here and what they have to put up with. It is not enjoyable. It is not the City of gracious living like it used to be when we have to fight and put up with this. And now we've got Amazon who's going to bring in a million people. I understand it's a 50-acre warehouse. The impact of all their cars, the people going to work there, the people going home, it's just going to be Benson Avenue and over to Foothill and the 210, isn't just going to be all in one area. So there's a lot of people here that I know who live in the area that are here to listen because of the impact of the traffic. It is horrendous. Now I'm a facilities person, director. I've been a businessman. But just hearing about this thing, I haven't had time to do some of the studies except for living here for this amount of time, over 40 years. So I hope the Council really looks into the people also. Why don't you take and put up this thing on the hill further instead of here.	Project will add less than 1% to the existing traffic on Baseline, approximately 2% to the existing traffic on Benson, and less than 5% to Foothill. All of the Project's trips would create less than a third of the traffic generated by retail store(s) the same size as the proposed Project, and would generate far less truck traffic. Therefore, the proposed Project, even including all the Project vans, is a much lower traffic generator than other uses permitted by the zoning for this property.
Bill Behjat		
I-23	The consequences of the heavy traffic, the --occupying our roads and now -- and the area to the residential and -- and the industrial come commercial areas, so many people of this city request that -- that I do a chart here. I spent a couple of days doing that with a consulting firm that is an environmental consulting firm and the result was failure. So I have the actual HRA here for the mayor; so I can present it to you, that HRA fail. As a result the SRA indicates that some people would develop cancer and that does not include health risk assessment for asthma or other illnesses. This is just cancer. I've been talking to head of pediatric oncology at Kaiser who is -- who is right now present here. And he also indicated that -- that the impact on the children, on minors, that are going to pediatric oncology at Kaiser are	The related document that was provided to the City by the commenter appears to be a calculation for stationary source emissions for Rule 1401 compliance. This applies to projects that propose backup generators or other similar stationary sources. Stationary sources are required to use best available control technology to ensure there are no risks before permits are issued. These calculations are not for trucks/vehicles and are not applicable to the proposed Project. The IS/MND thoroughly analyzed all thresholds required by the CEQA Guidelines and determined that the Project would result in no significant impacts after mitigation; impacts to Air Quality would be mitigated to a less than significant level. The Project is a last-mile fulfillment center and not a distribution center.

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	much higher in the area that they have distribution centers because of the trucks. So it's black and white in front of you. And for the sake of the children of the facility -- of the -- the Upland and -- and also the -- everybody who are more susceptible for illnesses, I recommend no on this project for this area. Should I present you this?	The majority of the Project's vehicle trips (approximately 98 percent) would be automobiles or vans and not heavy-duty diesel trucks. Diesel particulate matter would be below all required thresholds due to the minimal number of truck trips associated with the proposed Project. Notably, the proposed project will only be generating 25 trucks a day, which is considerably less than the number of trucks that would be generated by a same-size retail building on the site, and considerably less than the dozens of trucks per day generated by the existing rock and gravel processing operations. The South Coast Air Quality Management District (SCAQMD) requires Health Risk Assessments (HRAs) for projects that are within 1,000 feet of sensitive receptors and have more than 100 trucks per day. As analyzed in the IS/MND, the Project would have 25 trucks per day, which equates to 50 truck trips per day and remains under the 100 truck per day threshold noted above. Further, the truck court on the Project site would be approximately 2,000 feet (i.e., more than 1,000 feet) from the closest sensitive receptors. Therefore, impacts would be less than significant and an HRA is not required. Nonetheless, in response to comments, a mobile-source HRA has been prepared and is included in Attachment 3. As analyzed therein, the HRA shows that the highest calculated risk resulting from the Project is 1.92 per million residents, which is far below the South Coast Air Quality Management District's (SCAQMD) adopted significance threshold of 10 per million residents. This is because 98 percent of the Project's vehicle trips would be automobiles or vans and not heavy-duty diesel trucks, which are the primary generators of the diesel particulate matter analyzed in HRAs. The SCAQMD's significance threshold is health-protective of residents and other sensitive uses and is the adopted threshold used by lead agencies for HRAs.
Fariba Noory		
I-24	I guess I'm following with Mr. Behjat's comments since I heard about this proposal I have been looking at the online newspapers and whatever I can get my hands on. And these two articles, one is November 20 -- November	The Project site is located in the Commercial/Industrial Mixed-Use (C/I-MU) zone of the City, and the proposed warehouse is therefore a permitted use for the property. The Project is also consistent with the land

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	-- I'm sorry, October 27th, the other one is November 1st, LA Times. And this says limit, FAR to limit warehouses as falling short. The other one says beg banking big warehouses right next to homes. The article goes even though assuming 1,000 feet away is still the impact of the pollution on individuals, especially the children. I'm just going to add -- I'm going to take a moment of your time -- of your time but I'm going to read only one paragraph over here. It says experts have long worked to develop elevated asthma and cancer near police, near warehouse, distribution centers and other hubs because of the pollution immanent by trucks. Physicians have even labeled these places diesel dead zone. So I leave it to you guys, you make that decision for these people, their children, their grandchildren.	uses surrounding the property, which includes Cable Airport and a rock quarry to the north, commercial uses to the south and east, and industrial uses to the west. There are already existing warehouses and industrial uses in the City of Upland, in designated and zoned areas where those uses are appropriate distances from homes, therefore this Project would not be the first of this type of use in the City. See also Response to Comment 1-23 above. The comment is noted. The comment does not raise any issues or address the adequacy of the IS/MND for this proposed Project, and thus no further response is needed.
John Weinerth		
I-25	I live on 13th Street, right between San Antonio and Mountain; so this is new for me/ Speaking in front of the Council and it's really to share some concerns I have. I have a son that walks those streets to school every day. There's -- So if you will, I'm in the impact zone, right? There's three schools within one square mile of this project. You know, I know there is committed traffic patterns that they say they'll -- they'll be dedicated to. I find that highly [un]realistic because these are humans driving these trucks and vans, humans that need to stop at the bank, they need to stop at the drugstore. So I would just implore you, I don't know if you still have school age children, grandchildren in some cases, if you're living in these neighborhoods, if your children are walking these streets, if you're trying to sleep at night with trucks zooming by for that matter, you know, I'd implore you to [reconsider] supporting this project. I don't have some of the tremendous statistics or economics that others present but I would start there, right? This is why we chose to raise our families in Upland. And you know, we also have a police department right	The Project site is located in the Commercial/Industrial Mixed-Use (C/I-MU) zone of the City, and the proposed warehouse is therefore a permitted use for the property. The Project is also consistent with the land uses surrounding the property, which includes Cable Airport and a rock quarry to the north, commercial uses to the south and east, and industrial uses to the west. There are already existing warehouses and industrial uses in the City of Upland, in designated and zoned areas where those uses are appropriate distances from homes, therefore this Project would not be the first of this type of use in the City. As discussed in the IS/MND and the traffic impact study, the Project would result in a maximum of 5 trucks during daytime hours, resulting in a substantial reduction from current conditions. Additionally, the traffic study also overestimates the trips created by the Project, as it is based on a 276,000 square foot building, and the building was downsized further to only 201,000 square feet since preparation of the traffic study. That's a nearly 28% reduction compared to the building analyzed in the traffic study, therefore the trip generation will likely be even less than what's presented in the traffic study. Moreover, the existing rock and gravel

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	down the street that's going to be trying to get emergency responses on the very same streets to support our residents. So for all of those reasons, I question the logic in this. It seems like short-term gain, you know, for a lot of things that long term we're going to pay for and the community is certainly going to pay for. So you know in the past few years I've just had to worry about a plane crashing into my house. I certainly don't want to have to worry about my son getting to and from school safely.	processing operations generate dozens of trucks per day to off-haul materials processed onsite as compared to the proposed project's 25 trucks per day. Further, the majority of truck trips would not occur in the daytime hours, thus would not conflict with routes to schools. Additionally, there are no schools located on any of the Project's truck routes. Accordingly, the traffic study found that the Project would not conflict with the adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities and would not decrease the performance or safety of such facilities.
Eric Gavin		
I-26	I'm here in support of this project because I want the city we all live in to grow and prosper. Here everything in life is considered healthy if it's successful or -- and successful if it's growing -- When a child or a tree doesn't grow, we assume that it's sick, even at maturity most people extend the rest of their lives trying to grow their minds, their families, their business, to grow spiritually and emotionally. I want this city to grow and I want us to say yes. Upland now has a well-established reputation for being unfriendly to growth, change, opportunity and we are already losing out. While Upland is saying no to a regional sports park, Rancho Cucamonga is about to add 4,000 acres, including thousands of natural conservation. While Upland is resisting transformation of Memorial park -- might I remind you Ontario has received over 40 million dollars in grants to receive revitalize their downtown. While Upland is hereby tonight trying to stop the development of private land, Montclair is redeveloping Montclair Place with an investment from a build development company. While Upland is busy saying no, now we all have to admit Sycamore Hills did go through but not without its share of Upland negativity, Fontana is bringing high tech manufacturing and is the most prosperous city in all of California. While Upland is -- while Upland was opposing General Plan updates, and this is my favorite one, and accusing their elected officials of being communists, that was in the newspaper, Redlands will be the first to bring	Comment in support of the Project is noted.

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	the nation's first zero emissions passenger rail train to the entire continent of North America. While Upland's sad narrative of nay saying and stagnation becomes further cemented, our neighboring communities are changing the narrative and bringing prestige and growth to the Inland Empire. Please approve this project in accordance with its merits and adherence to our common documents, I will respond to every single of you our Planning Commissioners, your job is not to determine what you think or the residents think should be here, but rather whether a project adheres to the General Plan and our planning documents.	
Eric Nilsson		
I-27	I took a close look at the air quality assessment and a close look at the greenhouse emissions -- greenhouse gas emissions assessment. And frankly, I didn't like what I saw. To -- to not mince words, the studies are so poorly done they need to be set aside as inadequate. And there needs to be a full-scale environmental impact study performed. Let me tell you some of the problems. There are mathematical errors in some of the tables. The tables refer to the appendices that do not have material that's supposed to support the material in the tables; so someone revised these reports and failed to actually make thing synchronize so it's really pretty shoddy work. Now, as one example of questionable assumptions that are included in the air quality assessment and the greenhouse gas assessment, built into the model that the consultants generated was the assumption that when the vehicle leaves the warehouse to deliver something, the average number of miles they go is going to be 6.9 miles. 6.9 miles from Amazon delivery. It takes that long to get to Laverne. But then once the truck gets to Laverne it drives around for a couple hours delivering packages, racking up maybe 60 or more miles above the 6.9 Now the implications of that -- and that's just one error out of many, or one questionable assumption out of many, is that the reports, these air	A peer review was conducted of the GHG analysis included in the IS/MND by Ramboll, a leading engineering, design and consultancy company which helped develop the South Coast Air Quality Management District's (SCAQMD) preferred GHG emissions model, CalEEMod®, used to develop the GHG emissions inventory for the Project. This peer review memorandum, included as Attachment 1, confirmed that the IS/MND's GHG analysis was prepared using the most-recent, agency-recommended model consistent with SCAQMD guidance and industry standards for estimating GHG emissions and environmental impacts under CEQA. Ramboll's peer review concluded that the IS/MND correctly determined that the Project's GHG emissions would be less than significant. Additionally, while the IS/MND did not identify a significant GHG impact, the project has committed to further reducing GHG emissions through a number of new measures, including installation of solar panels on the building roof, EV chargers for 30 parking spaces, and EV-ready infrastructure for all trucks, all vans, and 50% of car parking spaces, among other measures. As a result of this new solar commitment, the project building is projected to have **net-zero electricity consumption**. These additional sustainability commitments are described in the Supplemental GHG Analysis, included as Attachment 2. As calculated therein, the project's GHG emissions would continue to be below the significance threshold identified in the MND of 10,000 MT CO2e per year, and would

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	quality assessment reports and the greenhouse gas assessment reports are, what they do is they grossly underestimate the number of miles that will be driven by vehicles associated with the warehouse. And by grossly underestimating the amount of miles that will be driven by those vehicles, they grossly underestimate the greenhouse gas emissions and other sort of noxious fumes that will be generated by those vehicles. Now, I took it upon myself to reproduce both of those reports and created my own alternative report which you can get from here, it's right here if you'd like to get it. [Alternative report is addressed separately as Comment Letter I-63].	also now be below 3,000 metric tons of CO2e per year even if that threshold were applicable. This supplemental GHG analysis, including these additional sustainability commitments, was also peer reviewed and confirmed by Ramboll, as noted in their memo. The commenter has incorrectly identified 6.9 miles as the average trip length. The 6.9-mile distance is only one component of the formula that is used to calculate average trip length based on district or county specific data. Three different distance categories were included in the model, which includes a 6.9 mile trip length, an 8.4 mile trip length, and a 16.6 mile trip length. Taken together, and weighted according to the CalEEMod formula below, the average trip length in the analysis is actually 12.6 miles from the warehouse. Furthermore, these are one-way trip lengths and the round-trip length used in the model is actually 25.2 miles. Air quality emissions and the trip lengths described above were calculated using the California Emissions Estimator Model (CalEEMod) developed for California Air Pollution Officers Association (CAPCOA). This is a standard and accepted model used by all lead agencies in the preparation of environmental documents and analyses, including the City of Upland. CalEEMod calculates average trips based on the following formula located on page 22 of CalEEMod Appendix A, Calculation Details for CalEEMod, pasted below. Average Primary Trip Length $_i$ = $H-W_{miles} \times H-W_{trip\%} + H-S_{miles} \times H-S_{trip\%} + H-O_{miles} \times H-O_{trip\%}$ Where $H\text{-}W_{miles}$ = Home to Work trip length $H\text{-}W_{trip\%}$ = % of the total primary trips that are Home to Work trips $H\text{-}S_{miles}$ = Home to Shopping trip length $H\text{-}S_{trip\%}$ = % of the total primary trips that are Home to Shopping trips $H\text{-}O_{miles}$ = Home to Other trip length $H\text{-}O_{trip\%}$ = % of the total primary trips that are Home to Other trips i = land use type. Further, the vehicular-source GHG and air quality emissions in the IS/MND likely overstate the actual emissions being created in that no credit for, or reduction in, emissions is assumed based on replacement of existing trips.

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		For example, the project would be delivering packages that, primarily, would already be traveling to people's homes on trucks and vehicles, but from farther distances than this project's proposed last-mile facility. Therefore, the project would largely be replacing (and reducing) existing trips, and associated greenhouse gas and air quality emissions.
Natasha Walton		
I-28	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'm a wildlife biologist. We should know what we're going to be losing biodiversity wise, we're going to be losing the cottontails, the habitat, the habitat there for raptors to come and forage. We're going to be losing the plant diversity there. There's going to be one day that this -- the biologist went out there and looked at the grids. There's not enough time to do an adequate survey for the birds. And August it was done August 29th of 2019. Those are not plants. Those are the time of year when native plants are dormant and so a lot of plants got missed I'm sure. And just scanning the area for one species that was not recorded in the species, a dominant species in the area that's being impacted, the seeds can be the same for conservation purposes. We can identify this species. So please understand that you lose more than just space or a homeless encampment-- or something like that, we're losing habitat for these animals. The assessment said oh, yeah, no -- no loss to wildlife. I understand this is private land but there's' not going to be any mitigation for it per say. I do appreciate that they're going to try and plant some -- some new plants and trees. I would hope that if this does go through but I don't really recall seeing a plant pallet showing and having them commit to something like this. But basically what I've learned, I've just kind of looked at different EIRs over the years is when a community wants to claim that they're saving you a wildlife habitat, they'll just pick anything and say yes it's -- you know,	An on-site habitat assessment was conducted for the Project site that is included in the IS/MND. As previously discussed, the proposed Project was reduced in size based on community feedback. A total of three field visits were made to the Project site during various seasons over the past year by two different biological consulting firms. The first was conducted within the blooming period of some plants, on March 29, 2018 by ELMT Consulting. This field visit determined that, based on habitat requirements for specific special-status plant species and the availability and quality of habitats needed by each species, the Project site does not provide suitable habitat for any of the special-status plant species known to occur in the area and are presumed to be absent from the Project site. The second site visit that occurred in August 2019 was adequate to assess the potential for sensitive species to occur on the Project site. Although the site visit occurred during a time when many plants are not present, the biologist determined that site conditions were not suitable for any special-status plant species to occur during any time of the year. As discussed in the IS/MND and the November 2019 Habitat Assessment prepared for the Project, the site is heavily disturbed due to a variety of human-related disturbances such as sand and gravel processing, illegal dumping and homeless encampments. As such, the site does not provide suitable habitat for any Federal or State threatened and endangered species. Finally, a third site visit was conducted on January 22, 2020 by a biologist from Rocks Biological Consulting, a second and independent firm from ELMT Consulting (which prepared the IS/MND's Habitat Assessment). Rocks Biological Consulting prepared the Supplemental Project Field Survey Memorandum (included as Attachment 5) which concurred that there is no potential for federally or state-listed as threatened or

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	they want to get credit, mitigation credit for it, they'll say that something is transmission lines areas as well as habitat that they're conserving but whenever they want to get rid of it, it's considered useless, it's considered something that has no value. There are many species that live there. We need to -- to determine and at least document what's going to be lost and let the community decide is that worth losing and can we mitigate for that in our community.	endangered plant or wildlife species to occur on the project site. In addition to the three site visits, the presumption of absence was also based on a query of the CDFW's California Natural Diversity Database (CNDDB) and the CNPS Electronic Inventory of Rare and Endangered Vascular Plants. The database queries found no instances of special-status wildlife or plant species observed on-site. As discussed in the November 2019 Habitat Assessment, Audubon's cottontail *(Sylvilagus audubonii)* and California ground squirrel *(Otospermophilus beecheyi)* were observed onsite; however, these species have adapted to human presence and disturbance and are not required to be assessed by the CEQA Guidelines as they are not identified as candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife ("CDFW") or U.S. Fish and Wildlife Service. The CDFW commented on the project regarding their belief that while highly disturbed there is Riversidean Alluvial Fan Sage Scrub (RAFSS) habitat on site. As Rocks Biological Consulting noted in its January memorandum, the RAFSS habitat "is highly disturbed by debris piles, off-road vehicle use, and homeless encampments and is further degraded by non-native invasive plant species such as filaree (Erodium sp.), tumbleweed (Salsola tragus), and castor bean (Ricinus communis)… Due to the highly disturbed condition of the scale broom scrub mitigation requirements may be less than those proposed for impacts on high quality, undisturbed scale broom scrub." A new mitigation measure has been added to the IS/MND to address this habitat. Given the high level of disturbance and impacted quality of the RAFSS habitat, the new mitigation measure requires that the applicant preserve scale broom scrub habitat with equal or better habitat value as the site's habitat at a 0.5:1 mitigation ratio.. Due to the high level of anthropogenic disturbances on-site and surrounding development, no special-status bird species are expected to occur on-site. However, the Project site has the potential to impact active bird nests if vegetation is removed or ground disturbing activities occur during the nesting season. Impacts on nesting birds, including any raptors, are prohibited by the Migratory Bird Treaty Act (MBTA) and California Fish

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		and Game Code (CFGC). The applicant has agreed to modify Mitigation Measure BIO-1 in the IS/MND to require a pre-construction nesting bird survey, if vegetation clearing and ground disturbing activities occur during the nesting season to be defined as February 1 to September 30th. With the implementation of Mitigation Measure BIO-1, impacts on nesting birds would mitigated to a less than significant level. The project proposes nearly 11 acres of new native landscaping as part of the project, along with 1,000 trees. A landscape plan identifying all of the native plants and 1,000 trees to be planted on site was provided with the Project applications and has been added to the Final IS/MND as Attachment 7.
April McCormick		
I-29	Okay. A couple things. I was a former county committee member and that is the -- and I've been hearing on social media that this is approved and that you're approved of being sued. I just believe that it's bad. I finally decided yesterday to look that up and verify that and well almost fainted. I have never called this a warehouse building, it's not a warehouse. What this is a logistical terminal; so I assumed that the planning board and the unified development ordinances and the permitted land uses would list a terminal as well as a warehouse and that those two things would -- would be allowed under the -- what could happen there. Well, to my surprise, there is no terminal classification in Upland And the code says if anything is not listed it's strictly prohibited. This thing couldn't be approved with a special use permit or variance. Upon discovering this I started researching Chino where they have an Amazon, Fontana to see if anywhere else has put this into the simple warehouse classification and of course they hadn't. I can't even believe I'm the only one that's noticed this when we have the City planner and other people that are supposed to be doing this. But I had to get a planner's dictionary which was generated by Galveston, Texas.	Section 17.51.010 of the City's Municipal Code defines warehousing as the provision of facilities used primarily for the storage of commercial goods, including documents. The Project is consistent with the City's definition of a warehouse facility. Further, warehousing is a permitted use within the C/I-MU zone as identified in Section 17.05.020 of the City's Municipal Code. Thus, the Project is consistent with the zoning for the Project site and is an allowed use within the C/I-MU zone as shown in Section 17.05.020 and Table 17.05-1, Permitted Land Uses in the Mixed-Use Zones, of the City's Municipal Code. The project does not in any way fit the definition of a truck terminal, and is correctly categorized as a warehouse. The US government defines types of businesses by Standard Industrial Classification (SIC). The proposed project fits squarely within Industry Group 422 (Public Warehousing and Storage) and Industry Group SIC Code 4225 – General Warehousing and Storage. The project does not fit within the SIC Industry Group 423 (Terminal and Joint Terminal Maintenance) or Industry Group 421, both of which include terminals operated by motor freight transportation companies. In addition, the ULI publication "Guide to Classifying Industrial Property" available online here:

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	They took terms from multiples states, cities, and counties all over the country to define every term in the natural world for -- So, first of all, let's get familiar with what motor freight is: Motor freight consists of various types of goods which is moved via trucks, not air or rail. What this needs to be is a terminal. Every single terminal definition in a planner's dictionary would fit this to an absolute -- is an absolute must. A transportation facility which quantities of goods or cargo are stored without undergoing any manufactured process, transferred to other carriers or stored outdoors and/or transferred to other locations I love this one, a facility to receive transfer, short-term storage, and dispatching of goods transported by trucks including those with the types of express mail service and packing distribution facilities, including such facilities operated by the post office. If the post office and FedEx and UPS and Everyone Express or DHL, they're all considered a trucking terminal, so on. This is equivalent to say a warehouse coming in here and saying it's a parts warehouse and then they pave a 380-acre parking lot and all the sudden Foothill becomes a truck stop. This is about what's about to happen here. You know, there's 1,100 delivery vans and 25 trucks Anything over 5 trucks is considered a terminal. So you have a fiduciary duty to not approve this because this is not permitted in the land use code.	http://courses.washington.edu/cee320ag/warehousing/WarehouseClassification.pdf describes truck terminals as follows: "***Truck Terminals do not warehouse goods. Their sole function is to transfer goods from one truck to another***. Because of this function Truck Terminals are long and narrow in design. Because Truck Terminals transfer rather than store cargo, the facilities also have low ceiling heights. ***Most ceiling heights range from 12 to 16 feet, which is below the height of any facilities within the Warehouse Distribution category***." (emphasis added) The proposed project does not fit this definition of a truck terminal. The proposed project's warehouse will be used to store and then distribute goods directly to customers on vans. No goods will be transferred from one truck to another truck at the project's warehouse, for deliver to the next warehouse in the supply chain, as is the case for a truck terminal. Further, the proposed project's ceiling height is 36 feet, well above the 12 to 16 foot range that is typical for a truck terminal. The project's 36 foot ceiling height is very typical of warehouses that are required to store goods on site in order to optimize storage capacity. The low, 12-16 foot ceiling height works for truck terminals because goods are immediately transferred from one truck to another, without storage. Therefore, the proposed project's warehouse fits neither the operational nor the physical characteristics of a truck terminal.
Brinda Sarathy		
I-30	There's thousands of pages of documents for Planning Commissioners, City Councils to pour through, much of it very technical, including technical appendices; so a couple of things that I do want to raise some of my concern about and I'm looking forward to hearing more about. And I will be submitting comments but I'll get them to you by January 21 so it's in the documentary record. First has to do with the Tier 3 thresholds in the greenhouse gas appendix and this -- because Upland is the lead agency on this, you actually have discretionary authority in relation to that threshold variance for	A peer review was conducted of the GHG analysis included in the IS/MND by Ramboll, a leading engineering, design and consultancy company which helped develop the South Coast Air Quality Management District's (SCAQMD) preferred GHG emissions model, CalEEMod®, used to develop the GHG emissions inventory for the Project. This peer review memorandum, included as Attachment 1, confirmed that the IS/MND's GHG analysis was prepared using the most-recent, agency-recommended model consistent with SCAQMD guidance and industry standards for estimating GHG emissions and environmental impacts under CEQA.

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	warehouse gas emissions. And I was quite surprised to see what you chose the industrial threshold for a stationary source, which is a heavy industry threshold of about ten thousand metric cubic tons of carbon based on CO2 equivalent per year, whereas if you chose the commercial/retail threshold, that's around 3,000 to 3,500 metric tons of CO2 equivalent per year. Elsewhere in the repot you actually categorize the project and do a lot of comparisons to 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 on air quality emissions and traffic studies and then you used level of service measures and you might want to consider vehicle miles traveled. It's a common measure used in a lot of metropolitan areas; so it is ground tested. And that might give more accurate numbers. I am deeply concerned about traffic congestion. It's not simply about the roads but we're talking about air quality, idling, what does that mean, some of it with a much more vaporized impact. This is a singularly use the type of facility. You can't simply compare it to allows or a home retail versus warehouse. This is a semi-logistical hub. And so it is incumbent upon you perhaps go look facilities such as Chino and elsewhere, there is the whole ITE study, Institute of Transportation Engineers, this is a recent development in the area, they're trying to figure out how to quantify high warehouse projects, and there's even given degrees for it, parcel hub, et cetera. So there's a lot there. Please, I ask for an EIR.	Ramboll's peer review concluded that the IS/MND correctly determined that the Project's GHG emissions would be less than significant. Ramboll also reviewed the GHG significance thresholds used to assess the Project's GHG emissions. The MND uses a 10,000 metric ton (MT) of carbon dioxide equivalent emissions (CO_2e) per year threshold to assess significance of the Project. The SCAQMD has not adopted a GHG significance threshold that applies to most land use development projects. The 10,000 MT CO_2e per year threshold was adopted to capture 90 percent of total emissions from all new or modified industrial (stationary source) projects.[10] A 3,000 MT CO_2e per year value was proposed as a screening threshold for land use development projects but was never adopted in any form by SCAQMD. In the absence of an adopted threshold, the lead agency has discretion to select a significance threshold. Thus, in this context, many lead agencies have applied the 10,000 MT CO_2e per year as a significance threshold because it was adopted by SCAQMD. Various lead agencies have used different approaches as a GHG significance threshold for warehouse development projects, including relying on the 10,000 MT CO_2e per year significance threshold. Based on Ramboll's assessment of the current state of the GHG CEQA practice, the IS/MND's approach to assess the significance of GHG emissions using 10,000 MT CO_2e per year is consistent with the current common approaches by lead agencies to evaluate a warehouse project's GHG emissions under CEQA. Additionally, while the IS/MND did not identify a significant GHG impact, the project has committed to further reducing GHG emissions through a number of new measures, including installation of solar panels on the building roof, EV chargers for 30 parking spaces, and EV-ready infrastructure for all trucks, all vans, and 50% of car parking spaces, among other measures. As a result of this new solar commitment, the project building is projected to have **net-zero electricity consumption**. These

[10] Available at: http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds. Accessed: January, 2020.

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		additional sustainability commitments are described in the Supplemental GHG Analysis, included as Attachment 2. As calculated therein, the project's GHG emissions would continue to be below the significance threshold identified in the MND of 10,000 MT CO2e per year, and would also now be below 3,000 metric tons of CO2e per year even if that threshold were applicable. This supplemental GHG analysis, including these additional sustainability commitments, was also peer reviewed and confirmed by Ramboll, as noted in their memo. The IS/MND does not categorize the Project as retail. As retail is also a permitted use under the site's zoning, the Retail Analysis Memorandum was prepared for comparison to the Project, to determine what the trip generation would be if a similarly sized retail building was proposed instead of the Project. This analysis determined that all of the Project's trips – including employee cars, vans, and trucks – would still create less than a third of the traffic generated by retail store(s) the same size as the proposed Project, and would generate far less truck traffic. Therefore the proposed Project, even including all the Project vans, is a much lower traffic generator than other uses permitted by the zoning for this property. The traffic study used the ITE Trip Generation rate for "High-Cube Parcel Hub Warehouse", which is a package delivery type land use, consistent with the proposed use. Additionally, the traffic study also overestimates the trips created by the Project, as it is based on a 276,000 square foot building, and the building was downsized further to only 201,000 square feet since preparation of the traffic study. That's a nearly 28% reduction compared to the building analyzed in the traffic study, therefore the trip generation will likely be even less than what's presented in the traffic study. Detailed technical studies, including a traffic study, analyzing the potential environmental impacts of the proposed Project determined that all impacts would be less than significant either before or after mitigation, therefore an IS/MND is the appropriate environmental document consistent with CEQA, and an EIR is not required. Nonetheless, all of the technical studies included in the Project's IS/MND are the exact same technical studies that would have been included in an EIR. Each study's

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		level of detail and thorough, comprehensive analysis is the same between this Project's IS/MND and an EIR. The only technical analysis that would have been in an EIR, that is not in an IS/MND, is an evaluation of alternatives to the Project. Therefore, there is no project-specific analysis that is missing from this IS/MND which would have been included in an EIR for the Project. Vehicle Miles Traveled (VMT) is not currently the City's or the County's adopted methodology for measuring transportation impacts, and as a result, there are a number of issues with attempting to use VMT to analyze the proposed project. At this time, neither the City nor SBCTA has an adopted methodology, thresholds, or procedures to analyze VMT in the area. Second, VMT only measures passenger vehicles miles of travel, not truck trips or truck VMT. Section 15064.3, subdivision (a), states, *"For the purposes of this section, 'vehicle miles traveled' refers to the amount and distance of automobile travel attributable to a project."* (emphasis added). Therefore, in the case of the proposed project, VMT would not account for the distances traveled by the trucks or van trips related to the project. Finally, VMT is intended to measure the impact of a project on a regional or subregional area and therefore it is not a useful metric for analyzing the amount of traffic or congestion that would be experienced in the local community due to a new project, as explained below. The state has imposed the future requirement for a VMT analysis on all local cities as of July 1, 2020, regardless of whether local cities would prefer a VMT or the current LOS methodology used. VMT only measures the total distance traveled by automobile trips generated by the project, with the goal of reducing the average distances traveled. It is useful tool to evaluate regional land use planning – such as jobs housing balance, access to transit, etc., which affect personal travel patterns to work, shopping, or personal activities. On the other hand, the current metric of LOS (level of service) measures the delay caused by vehicles waiting in traffic at intersections, and therefore measures the actual traffic congestion experienced by drivers before and after the opening of a project. As an example of LOS, under Year 2020 conditions the intersection of Central Avenue/Foothill Boulevard has an average delay (per vehicle) of approximately 32.9 seconds during the evening peak

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		hour and therefore, operates at LOS C. After the addition of project traffic, this delay measurement increases to 33.4 seconds of delay which means that the intersection would still operate at LOS C. The City of Upland has set LOS D as the acceptable standard for operating conditions at this intersection and therefore the addition of project traffic would not exceed the City standard and no significant impact would result from the addition of project traffic. Similar conclusions are drawn from the analysis of Year 2040 conditions. LOS is also a better tool for cities to evaluate what roadway (or transit) infrastructure is needed to reduce traffic congestion, and leads to mitigation like physical street improvements. In contrast, VMT does not provide for mitigation such as street improvements, and actually discourages improvements such as street widening or new turn lanes. Under the VMT approach, such street improvements would incentivize more people to drive and use public streets. Therefore, a VMT analysis would not lead to physical street improvements to the City's roadways, and in fact would discourage implementation of such improvements. In sum, LOS is the current required methodology for analyzing traffic impacts in the City of Upland and the SBCTA Congestion Management Program (CMP), not VMT; there is not an CMP or Upland-adopted methodology or threshold for analyzing VMT and therefore the traffic analysis for the project was prepared according to the current City requirements. VMT does not measure actual traffic congestion levels and thus will not result in the type of mitigation that will improve vehicle circulation and reduce congestion. Section 17.51.010 of the City's Municipal Code defines warehousing as the provision of facilities used primarily for the storage of commercial goods, including documents. The Project is consistent with the City's definition of a warehouse facility. Further, warehousing is a permitted use within the C/I-MU zone as identified in Section 17.05.020 of the City's Municipal Code. Thus, the Project is consistent with the zoning for the Project site and is an allowed use within the C/I-MU zone as shown in Section 17.05.020 and Table 17.05-1, Permitted Land Uses in the Mixed-Use Zones, of the City's Municipal Code.

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		Detailed technical analyses prepared for the proposed Project resulted in less than significant impacts for all resources required to be evaluated under CEQA. Therefore, an Environmental Impact Report is not required. An IS/MND is the most appropriate CEQA document for this Project. The studies show that all potential impacts are reduced to less than significant. Under CEQA, the only additional analysis that an EIR requires is a project alternatives analysis to consider whether there are any project alternatives that would reduce significant impacts that cannot be mitigated. Here, because there are no significant impacts after mitigation, CEQA does not require an analysis of project alternatives.
Lois Sicking Dieter		
I-31	I have reviewed the initial study. I am against this proposed project going forward without an Environmental Impact Report. I find that this initial study as flawed methodology, uses outdated software, in some instances by 20 years. Indicated conclusions were based on analysis and results not well defined. Inputs to models were not defined. Analysis software programs were not disclosed. And if they were, the ref date and the revision number was not disclosed. Most raw data output was not included. That was unexpected. In my opinion as an environmental engineer, this study does not make standard engineering best practices which also leads me to question whether or not it was peer reviewed, which is part of due diligence by City planning staff. For example, on the hydrology calculations we already know this project is 50.25 acres; however, the proposed site only includes hydrology calculations for 48 acres. What happened to the other 2 acres. I don't know. That would -- that should have been caught in the peer review. Another example, on the hydrology calculation and analysis program done in May of 2018 on the existing site, a lot of these studies as existing versus the proposed. On the existing site they used a software program with a revision date of 2016 and a version date of 2023. It was good -- it was good	The hydrology calculations (Appendix E) previously used a very slightly smaller project site area (48 acres) based on an earlier alignment of project driveways. The hydrology report has been updated to include the full 50.25 acre site area and is included as Attachment 6 of the responses to comments. The change in acreage does not alter any of the conclusions in the technical analysis. The programs used in the hydrology report are based on the formulas in the San Bernardino County Hydrology Manual. The Manual was last issued in 1986 and has not been revised since, therefore the 1999 and 2016 program versions use the same formula, math and calculations. Both the 1999 and 2016 programs produce the same calculation results, therefore the calculations in the hydrology report are accurate and use the latest formulas. Nonetheless, all calculations have been run through the 2016 program and are included in the updated hydrology report, included as Attachment 6 of responses to comments. All required data and references are in compliance with the San Bernardino Hydrology Manual are included in the drainage report. The existing condition Rational Method calculations contained in the report are from May of 2018. In general, the easterly portion of the site was modeled as "open brush, poor cover" while the westerly portions were modeled as "barren" due to the grading, stockpiles and ongoing operations in this area. The hydrology report references the stockpiles and

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	data, it was good output. And then I compared that to the proposed. The proposed used version 8 dated 1999. Dated 1999. As a reg writer, I write specifications and what I am acutely aware of is that going from a 2016 version which is still the most current to a 1999, you miss 20 years, over 20 years of regulatory updates, improved mathematical modeling, improved mathematical relationships. I ask that you direct staff to conduct the necessary actions to take -- to develop an Environmental Impact Report. Furthermore it needs to be peer reviewed. And that review disclosed.	states that runoff has the ability to flow around the stockpiles and maintain existing drainage patterns towards Foothill Boulevard. It appears that there has been ongoing activities at the northwesterly portion of the site since the aerial topography. Recent Google satellite images and field visits indicated that some stockpiles have been removed and/or relocated to other areas within this portion of the project site. However, it appears that this activity is exclusive to the same area as that from May 2018 topography. The removal or addition of stockpiles in this area does not affect the overall land usage, the general paths of travel or the existing drainage patterns. The easterly and southerly portions of the site remain unchanged. The recent activity has not changed the overall land usage, area of disturbance, points of discharge or overall gradient of the project site and therefore has no impact on the existing condition hydrology calculations. See Water Quality Management Plan (WQMP), included as Appendix F of the IS/MND, for detailed calculations of stormwater treatment for the first rain event (aka. first flush). Detailed technical studies analyzing the potential environmental impacts of the proposed Project determined that all impacts would be less than significant either before or after mitigation, therefore an IS/MND is the appropriate environmental document consistent with CEQA, and an EIR is not required. Nonetheless, all of the technical studies included in the Project's IS/MND are the exact same technical studies that would have been included in an EIR. Each study's level of detail and thorough, comprehensive analysis is the same between this Project's IS/MND and an EIR. The studies show that all potential impacts are reduced to less than significant. Under CEQA, the only additional analysis that an EIR requires is an alternatives analysis to consider whether there are any alternatives that would reduce impacts that cannot be mitigated to less than significant. Here, because there are no significant impacts, CEQA does not require a project alternatives analysis to try to reduce impacts. The only technical analysis that would have been in an EIR, that is not in an IS/MND, is an evaluation of alternatives to the Project. Therefore, there is no project-specific analysis that is missing from this IS/MND which would have been

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		included in an EIR for the Project.
Mike Nunez		
I-32	Just very quick. We're here -- we're here on a second time basis. The first-time basis, people behind us thought they were very confident in demonstrating their -- their project. And I think they were wrong. What's happened since -- actually, a few things happened since. We kind of discovered that very little benefit -- financial benefit was going to be going to Upland; so they decided to start throwing money around and, you know, and try to get a favorable view of the project. But it's striking that we still do not know who the lease person or the lease company that will be going. I think that's very, very wrong to not tell the City who is going to be leasing 55 acres of property on our west end when there's houses around there. And they still refuse this date to tell us who it is. We all have an idea at this point. But the main point I wanted to make sure was the traffic study/ Who in this room believes that there is zero impact on this traffic study? That's -- that's very evident. Yeah, and I'd like to know if our police department was involved in this study since they hold the statistics particulars on traffic enforcement, on traffic citation, traffic collisions, were they involved? I think corroboration between a police department and a developer is warranted at this point. Give our chiefs -- we all hold this -- we hold our chief in high regard in this city; so he's a voice that most of us will probably listen to. If he tells us it's going to be okay, we're probably going to be okay. So why not involve our police chief? So going back to the developer again, you know, I understand what's going -- you know, money going to the schools and money going for road repairs finally because I believe they initially said they were not going to live us for road repairs. Why in the world is our Upland Chamber receiving $50,000 from the developer when they should be leading the front against this project because they're going to kill every single small business in this town?	A tenant has not yet been identified for the Project, and the scope of the City's Municipal Code does not provide authority for the City to determine or review the choice of tenant that may occupy the building. *Friends of Davis v. City of Davis* (2000) 83 Cal.App.4th 1004, 1013-14. While the tenant has not been determined at this time, any future operator of the Project site would be subject to all of the mitigation measures, conditions of approval and commitments contained in the Development Agreement as the proposed Project. Any future use on the Project site would be required to comply with the uses approved for the site, and environmental analysis in the IS/MND. Accordingly, CEQA Guidelines provide that analysis is based on the operational and construction related environmental impacts of a project and does not consider the owner or prospective tenant in that analysis. The proposed Project is subject to the City's standard development review process which includes project review by all City departments, including the police department. Even with all of the Project-related vehicles, including trucks, vans and employee vehicles, during the peak hours (i.e. when the greatest number of cars are on the road in both the morning and afternoon), the Project will add less than 1% to the existing traffic on Baseline, approximately 2% to the existing traffic on Benson, and less than 5% to Foothill. All of the Project's trips would create less than a third of the traffic generated by retail store(s) the same size as the proposed Project, and would generate far less truck traffic. Therefore, the proposed Project, even including all the Project vans, is a much lower traffic generator than other uses permitted by the zoning for this property. Additionally, the traffic study also overestimates the trips created by the Project, as it is based on a 276,000 square foot building, and the building was downsized further to only 201,000 square feet since preparation of the traffic study. That's a nearly 28% reduction compared to the building analyzed in the traffic study, therefore the trip generation will likely be even less than what's presented in the traffic study.

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	So that answer needs to be answered. Why is our chamber involved in this?	Financial commitments and economic impacts are not part of the environmental analysis required under CEQA. Section 15131(a) of the CEQA Guidelines states that economic or social effects of a project shall not be treated as significant effects on the environment and that the focus of the analysis shall be on the physical changes taking place. Therefore the Project's financial commitments are outside the scope of the IS/MND.
David Wade		
I-33	I'd like to -- somebody mentioned 1,100 vans going out, coming back. I don't know how many times a day, but going out and coming back is 2,200 trips. We have, if they come back a couple times, 3,300, 4,400. We don't need this kind of traffic running through here. We've already got two-hour delivery from Amazon, why do we need it here to be supporting other cities when we don't make any sales tax, local sales tax off of it? It is ridiculous. And I'd also like to point out the zoning issue. Industrial zoning does not state anywhere anything about having a distribution hub or a -- or a terminal facility in it, nor does the commercial zoning for Upland. All of these other cities mentioned have it, which leads me to believe that our Planning Commission has not been doing a proper job on updating our codes, updating our General Plan. This is why we need to have term limits and we need to have a fresh perspective in here and to stay on top of this. I don't' see any benefit from -- from something that's not zoned property that's going to overburden our roads. You put apartments on Central Avenue and now you want to run semis right by them. It's ridiculous. It's ridiculous. You're going to be crossing Foothill. We don't -- this isn't what we need. Show me an Amazon distribution center anywhere on Foothill Boulevard? You won't find one. And there's a reason for it. It's not the proper place to be in our commercial corridor. We need to have proper studies and we need to have a Planning Commission that's willing to represent us.	The traffic study determined that the Project would result in 2,483 daily trips, including all trucks, vans, and employee vehicles. Even with all of the Project-related vehicles, during the peak hours (i.e. when the greatest number of cars are on the road in both the morning and afternoon), the Project will add less than 1% to the existing traffic on Baseline, approximately 2% to the existing traffic on Benson, and less than 5% to Foothill. All of the Project's trips would create less than a third of the traffic generated by retail store(s) the same size as the proposed Project, and would generate far less truck traffic. Therefore, the proposed Project, even including all the Project vans, is a much lower traffic generator than other uses permitted by the zoning for this property. Additionally, the traffic study also overestimates the trips created by the Project, as it is based on a 276,000 square foot building, and the building was downsized further to only 201,000 square feet since preparation of the traffic study. That's a nearly 28% reduction compared to the building analyzed in the traffic study, therefore the trip generation will likely be even less than what's presented in the traffic study. The Project is a warehouse facility consistent with Section 17.51.010 of the City's Municipal Code which Code defines warehousing as the provision of facilities used primarily for the storage of commercial goods, including documents. The Project is located within the C/I-MU zone, and Section 17.05.020 of the City's Municipal Code identifies warehousing as a permitted use within the C/I-MU zone. The project does not in any way fit the definition of a truck terminal, and is correctly categorized as a warehouse.

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	It's not about progress, it is not about the best wishes of the community, it's the best use of that land. Is this really the best use of that land? No local tax, all of these environmental issues and more traffic than I even care to try to imagine per day. It's not a good idea.	The US government defines types of businesses by Standard Industrial Classification (SIC). The proposed project fits squarely within Industry Group 422 (Public Warehousing and Storage) and Industry Group SIC Code 4225 – General Warehousing and Storage. The project does not fit within the SIC Industry Group 423 (Terminal and Joint Terminal Maintenance) or Industry Group 421, both of which include terminals operated by motor freight transportation companies. In addition, the ULI publication "Guide to Classifying Industrial Property" available online here: http://courses.washington.edu/cee320ag/warehousing/WarehouseClassification.pdf describes truck terminals as follows: "***Truck Terminals do not warehouse goods. Their sole function is to transfer goods from one truck to another***. Because of this function Truck Terminals are long and narrow in design. Because Truck Terminals transfer rather than store cargo, the facilities also have low ceiling heights. ***Most ceiling heights range from 12 to 16 feet, which is below the height of any facilities within the Warehouse Distribution category***." (emphasis added) The proposed project does not fit this definition of a truck terminal. The proposed project's warehouse will be used to store and then distribute goods directly to customers on vans. No goods will be transferred from one truck to another truck at the project's warehouse, for deliver to the next warehouse in the supply chain, as is the case for a truck terminal. Further, the proposed project's ceiling height is 36 feet, well above the 12 to 16 foot range that is typical for a truck terminal. The project's 36 foot ceiling height is very typical of warehouses that are required to store goods on site in order to optimize storage capacity. The low, 12-16 foot ceiling height works for truck terminals because goods are immediately transferred from one truck to another, without storage. Therefore, the proposed project's warehouse fits neither the operational nor the physical characteristics of a truck terminal. The General Plan is consistent with the Municipal Code and identifies that warehousing is an allowable use within the C/I-MU zone. The Project is

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		also consistent the General Plan's description of the C/I-MU zone as follows: "The Commercial/Industrial Mixed-Use designation is **designed to accommodate a variety of industrial** and regional retail uses and to support commercial activities to satisfy a range of shopping needs for residents of the community. **It is also intended to encourage development of business in the City and to maximize the potential for job generation.** Uses supported under this category include commercial and industrial. **Typical industrial uses could include limited general industrial, manufacturing, assembly, warehousing, multi-tenant industrial, research and development, and airport–related uses**. Typical commercial uses include retail commercial and durable sales goods, tourist-related commercial, entertainment, recreational uses, administrative and professional offices, commercial activities, business support services, food and institutional uses, as well as residential, subject to a reasonable minimum increment of land area as well as a special use permit process." (emphasis added) The Project is also consistent with the following General Plan policy of the City: "Policy LU-3.2 Economic Revitalization. Promote the development of vacant and underutilized parcels with higher intensity commercial and industrial land uses." While tax revenue to the City is outside the scope of the environmental analysis in the IS/MND, the project's proposed Development Agreement provides for an annual contribution for road maintenance, with the term of the contribution to be determined as part of the public review process. This annual contribution would be just part of the project's multi-million dollar financial commitment to the City included in the proposed Development Agreement, and in addition to the $2.5 million in City fees that the project will also be paying. The annual contribution is intended to replicate what the City could theoretically collect in sales tax from a retail project of similar size—however, at this dollar amount, the project's proposed annual contribution is the equivalent of a top 10 sales tax producer for the City. Additionally, while sales tax is variable (and mostly down over the last decade), and retail is generally declining, this would be

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		guaranteed revenue for the City, and, again, would make the project one of the largest revenue sources for the City.
Chris Garcia		
I-34	What I have a reference -- kind of the same nature of conversations everyone has been kind of already entering is some of the traffic and some of the congestion -- some of the congestion and the traffic that's been projected for the project. It looks like from the initial study for reference, I have a map here, and from the project obviously the 13th Street looks to see the access area for the vans that's possibly employees and distribution for the vans. Their goods. It looks like it's 2,400 possibly vans that are going to be participating in the -- in the delivery. And from reference from some of the initial study it looks like there's an apple shift, obviously it's 2,400, that would you know be 600 divided by four, a concentration of AM shift, a PM shift for 600 hundred, the difference being 1,200. With that amount of traffic being congested in the streets you have now there would be definitely some I think initial studies of how congested some of the streetlights would be. But -- and the initial study doesn't seem like there's a lot of data within those studies, like some of the streetlights it shows reference of barely being a couple seconds later in wait times in those perimeter parameters such as you know the mash the 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 though the police department, I think there's studies of 985 percentile 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	The trip generation for the Project is based on the ITE *Trip Generation*, which in turn is based on actual surveys of parcel delivery uses. The traffic study determined that there would be 198 trips generated during the AM peak hour and 198 trips during the PM peak hour, which includes trips anticipated from trucks, vans and employee vehicles. During the peak hours, the Project will add less than 1% to the existing traffic on Baseline, approximately 2% to the existing traffic on Benson, and less than 5% to Foothill. All of the Project's trips would create less than a third of the traffic generated by retail store(s) the same size as the proposed Project, and would generate far less truck traffic. Therefore, the proposed Project, even including all the Project vans, is a much lower traffic generator than other uses permitted by the zoning for this property. Additionally, the traffic study also overestimates the trips created by the Project, as it is based on a 276,000 square foot building, and the building was downsized further to only 201,000 square feet since preparation of the traffic study. That's a nearly 28% reduction compared to the building analyzed in the traffic study, therefore the trip generation will likely be even less than what's presented in the traffic study.

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	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 us would like to -- to know. And you know that could be a little more clarity for all of us to understand.	
Libby Hummel		
I-35	I am extremely opposed to the biggest development project effort. It is not a proper location for an Amazon facility due to its location and residential area. I am -- We also have emergency services directly across the street from the proposed location. This is the fire department on and the police department on 16th Street. We all know time is of the essence in a life and death situation since this is a residential area our quality of life will be affected by traffic, noise, and pollution. This will come from trucks, vans, autos, airplanes, and in the future goes with the bus noise. Furthermore, our property needs -- our property will depreciate along with our health. I have a suspicion -- I have a suspicion that our voting rights were taken unconstitutionally I believe two years ago in District 21, about the time this was started. To date we still don't have any representation on the council. The last the City and its representatives can do is provide a proper Environmental Impact Report from someone other than a something cohort.	The Project site is located in the Commercial/Industrial Mixed-Use (C/I-MU) zone of the City, and the proposed warehouse is therefore a permitted use for the property. The Project is also consistent with the land uses surrounding the property, which includes Cable Airport and a rock quarry to the north, commercial uses to the south and east, and industrial uses to the west. There are already existing warehouses and industrial uses in the City of Upland, in designated and zoned areas where those uses are appropriate distances from homes, therefore this Project would not be the first of this type of use in the City. A comprehensive traffic study was prepared, which determined that all impacts would be less than significant after mitigation. Additionally, the traffic study also overestimates the trips created by the Project, as it is based on a 276,000 square foot building, and the building was downsized further to only 201,000 square feet since preparation of the traffic study. That's a nearly 28% reduction compared to the building analyzed in the traffic study, therefore the trip generation will likely be even less than what's presented in the traffic study.
Brigitte James		
I-36	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	Detailed technical studies analyzing the potential environmental impacts of the proposed Project determined that all impacts would be less than significant either before or after mitigation, therefore an IS/MND is the appropriate environmental document consistent with CEQA, and an EIR is not required. Nonetheless, all of the technical studies included in the

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	issues and their complaints and what they're concerned with. But if you just say no, then nothing happens. We live in a capitalistic society, if we do not grow we die. We cannot live off of home tax base only. Retail is -- doesn't have the strong foothold that it used to have. We have to move into difference kinds of commerce. Ecommerce is strong. Ecommerce is also making brick and mortar stores. Why not put into the contract that there has to be a small brick and mortar component to it so there's point of sales. Continue the negotiations. Why can't you negotiate in this contract some kind of point of sale distribution with whatever goes on, anything that's delivered in Upland, something, but if you just say no, nothing happens. We need to move forward. We already know we don't have to worry about 13th Street because that's been taken off the list. We know that there's going to be road he shall use. All right. So we can plan ahead for that. We've got to find a way that we can get a continued revenue stream from this. There certainly has to be a way. A lot of the community is asking for an EIR, then let's do it because that will answer some people's concerns. If that's going to be one of the deciding factors, because a lot of people in here are worried about the environment. We also have to worry about the economics and the young families who are trying to make a living and to move up. I've talked to a few Amazon employees and it's really not as bad as anyone says. Are there companies things that are bad? Yes. And I get it. There's bad health care, there's bad but there's good too. But we have to negotiate. If you keep saying no, no, nothing happens. We've got to move forwards. Let's look at the concerns they have. Bridge has been open and they've been listening to all of these concerns. I think they will continue to do so. I would also like to add is that no one is talking about the family that owns the property. The Giovannis have a say in this. This is their private property	Project's IS/MND are the exact same technical studies that would have been included in an EIR. Each study's level of detail and thorough, comprehensive analysis is the same between this Project's IS/MND and an EIR. The only technical analysis that would have been in an EIR, that is not in an IS/MND, is an evaluation of alternatives to the Project. Therefore, there is no project-specific analysis that is missing from this IS/MND which would have been included in an EIR for the Project. While economic impacts are outside the scope of the IS/MND, a Development Agreement is part of the project's entitlements which proposes millions of dollars in contributions for the City, in addition to the City's standard development impact fees. These contributions would go towards road maintenance, police, parks, education, local businesses and other civic improvements.

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	and to a certain extent the they can do what they want with it. I find it very interesting that primarily a Republican audience which is all about my property, I get to do what I want, gets to regulate somebody. I don't think the Giovannis want to have brick and mortar stores or maybe they do, maybe they don't. I'm not saying it's right and I'm not saying it's wrong, I'm saying don't close the door. Keep the door open and start looking at all of those concerns and work with Bridge and work with the family and see what can be worked out.	
Charlene Contrares		
I-37	The traffic study is flawed, which in turn makes the other studies incorrect. The noise report shows a significant impact under CEQA, as the actual readings differ by more than 10 decibels from the model. Nighttime noise levels need to be included in the analysis. An Environmental Impact Report is needed.	The traffic study is based on the guidelines from the San Bernardino County Transportation Authority (SBCTA) Congestion Management Program which is followed by the City of Upland. Additionally, the traffic study also overestimates the trips created by the Project, as it is based on a 276,000 square foot building, and the building was downsized further to only 201,000 square feet since preparation of the traffic study. That's a nearly 28% reduction compared to the building analyzed in the traffic study, therefore the trip generation will likely be even less than what's presented in the traffic study. The commenter incorrectly states that significant impact would occur because modeled traffic noise is more than 10 dB greater than the ambient noise measurements. Ambient noise measurements and modeled traffic noise levels are analyzed in different scales and cannot be compared. The Project would not generate a perceivable traffic noise increase. Nighttime noise levels were considered and included in the analysis; in fact, CNEL (Community Equivalent Noise Level) measurements are weighted differently during the hours between 7 p.m. and 7 a.m. to account for noise sensitivity during evening and nighttime hours. The intent of the noise measurements is to obtain the background ambient conditions without the influence of other sources, such as traffic. The traffic noise modeling was conducted to directly compare "without project" and "with project" conditions to determine the Project's

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		contribution to traffic noise. As shown in Table 10 and Table 11 of the Acoustical Assessment, the greatest increase in noise between with and without Project conditions would occur on Central Avenue between Foothill Blvd and 11th Street. At this location, traffic noise would increase by 0.7 dBA which is below the human ear's ability to perceive. Therefore, as stated in the Acoustical Assessment, traffic noise impacts would be less than significant. Detailed technical studies analyzing the potential environmental impacts of the proposed Project determined that all impacts would be less than significant either before or after mitigation, therefore an IS/MND is the appropriate environmental document consistent with CEQA, and an EIR is not required. Nonetheless, all of the technical studies included in the Project's IS/MND are the exact same technical studies that would have been included in an EIR. Each study's level of detail and thorough, comprehensive analysis is the same between this Project's IS/MND and an EIR. The only technical analysis that would have been in an EIR, that is not in an IS/MND, is an evaluation of alternatives to the Project. Therefore, there is no project-specific analysis that is missing from this IS/MND which would have been included in an EIR for the Project.
Bob Cable		
I-38	Well, I'm here as you obviously know to support this project and of course my name is Bob Cable and my family has been owning the Cable Airport for just about 75 years now. So when we talk about change, we've seen a lot of change when we first built the airport here there was nothing around here but orange groves so for the people to think that life isn't going to change and technology is not going to change the way we live, I can tell you you're wrong. And I've seen it lap and I've seen it happen over and over again. And I'm excited about Upland going to be on the cutting edge of this change once, just once. We -- we broke a developer that tried to get the colonies in the first time. We had a ton of opposition for the second time and it still went in. And it's a great asset to the community and to the citizens of Upland	Comment in support of the Project is noted.

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	and our surrounding community. So to say that I'm associated or the City is associated with -- with a cutting edge Amazon retail/quick delivery service, I'm excited about that. It's nice to be on the cutting edge now and then and it's nice to be recognized for something that -- that nobody else has. So I would urge you take a good hard look about what brings people to the City of Upland because I'll ask them, what do you hear? Crickets? And I'll find 20 who say know what people come to the City of Upland because we've got the cutting edge Amazon center here. I'm cool with that. I'm totally okay with that. I'm good with that. And it's a playing that all the years and the things 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, one 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 to put up with the fires. I have had tenants attacked by people in that field. A lot of people think I put up a fence for security, that was part of it, and you know what it's for, to protect my business; so if you really want to know what it's like come spend a few days down next to that fence. And you know what, you'd approve this today.	
Carlos Garcia		
I-39	Specifically, I'd like to know who was invited or who allocated this particular land specifically for schools? We already covered the chamber and other aspects of it too. I come from education. $100,000 for our schools does nothing, it doesn't even pay after of a salary for a teacher for the most part, including the benefits and all of that. Part of what we really need to look at is the environment. It's already been talked about. How is this going to talk about -- 10 million dollars what	While economic impacts are outside the scope of the IS/MND, a Development Agreement is part of the project's entitlements which proposes millions of dollars in contributions for the City, in addition to the City's standard development impact fees. These contributions would go towards road maintenance, police, parks, education, local businesses and other civic improvements. Additionally, Bridge's investment in the property and other off-site

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	we're talking about yearly for a 50-year lease, okay. 10 million dollars is nothing. They got 50 million dollars, it's nothing. By the time it hits that bank, it's already spent. Are we talking about -- I was -- are we talking about our retirement plan and -- it's not going to do anything for it, right? So what Ms. James also said about not keeping the door open I agree with her on that. If we're going to negotiate, let's negotiate for the better of Upland. We keep crying that we don't have money we don't have money we don't have money but the other thing I also hear is that we're afraid of being sued. Well, we pay our attorney half a million dollars to cover, right, so why not put that to work.	improvements could expand the City's tax revenue base in the future. The project will create 300 permanent jobs, and these employees will want to eat and buy goods and services at neighboring stores. Not only will the Project be adding 1,000 new trees and nearly 11 acres of landscaping on the property, but the Project will also be paying for and installing new landscaping, curbs, gutters and sidewalks over approximately 1,000 linear feet of Foothill Boulevard as detailed in the Development Agreement. These improvements will enhance the aesthetics and attractiveness of the street and could make the currently vacant lots on Foothill more attractive to development, including retail. The Project could serve as an economic catalyst for the Foothill Blvd corridor that will have long-lasting tax revenue benefits for the City Furthermore, the City requires that all new development pay Development Impact Fees in order to offset impacts associated with increasing the City's demand for public services.
Terry D.		
I-40	I had an opportunity to attend a human trafficking conference this week, last Saturday; so what I'm not hearing being said tonight is what going to come in on the trucks and vans. A speaker asked the question, where does this kind of activity take place? People responded, Disneyland, the Rose Parade. At any type of a big event. Why? Around Disneyland, the area around it, the traffic. You have people coming from other states and other countries; so -- Then she asked let's bring it closer to home. Where else do you think bad things happen? Nobody responded. She said think about this. High density housing and traffic. We have a lot of big vehicles, a lot of vehicles, no matter what size. What that welcomes in is prostitution and human trafficking, drug cartels. On this flier that those there was a young man handing out as we came in there was a dollar amount that was supposed to go directly to the police department. That dollar amount needs to be increased to five times that amount.	Per the CEQA Guidelines, the Project analyzes 20 resource categories. Humans trafficking is not required to be evaluated under the CEQA Guidelines and is therefore out of the scope of the IS/MND analysis.

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	The prostitution, child trafficking, the fight against the drug cartels, they're going to outnumber the police department just like that. What's down the street from this location? The nude dancing whatever you want to call it. That's a perfect prime location for such activity. Today in the news there was talk about the City of Pomona dedicating two full-time officers to walk the boulevard. Why? To combat prostitution and human trafficking. The age for human trafficking starts at the age of 12. This human is sold to different gangs throughout our region. Drugs are a one-time hit, it comes and goes, but a 12-year-old human can be sold and resold and resold. You don't until they can no longer perform, then they're took to the side of the road or they're killed. Is that what each and every one of you want to bring to this community? If so, know that you own this. Okay?	
Alunzo Zaldivar		
I-41	I'm excited to be here tonight to voice my opinion in strong disagreement on the desired permission Amazon is currently trying to get in an effort to place a 5-acre distribution plant in a city I grew up -- 50. I'm sorry. 50. Makes it even worse. In a city that I grew up never seeing as a commercial hub, I'd like to begin to remind Councilmembers that this decision that lies before them is very important and it should be taken with an infinite view, not so much a finite one. And I can imagine how easy it is for us to get caught up in the glamor that Amazon has promised regarding jobs, increasing consumer spending, and especially the use of unused that kind much has created a sore as I'm driving down Foothill. But according to Amazon's 2018 income statement they've spent roughly 28 billion in research and development and throughout the years it's grown enormously. Just year over year, 27.48 percent and 2016, 79.28 percent. Now, what this means is all they do is promise to provide us jobs in this distribution plant that I'm sure will provide many, I think it's very short-term. And as many people here have spoken about the -- the change that we've seen before us and it's -- it's rapid. And before we know it,	The project site is located in the Commercial/Industrial Mixed-Use (C/I-MU) zone of the City, and the proposed warehouse is therefore a permitted use for the property. The Project is also consistent with the land uses surrounding the property, which includes Cable Airport and a rock quarry to the north, commercial uses to the south and east, and industrial uses to the west. There are already existing warehouses and industrial uses in the City of Upland, in designated and zoned areas where those uses are appropriate distances from homes, therefore this Project would not be the first of this type of use in the City. The scope of the City's Municipal Code does not provide authority for the City to determine or review the choice of tenant that may occupy the building. *Friends of Davis v. City of Davis* (2000) 83 Cal.App.4th 1004, 1013-14. While economic impacts are outside the scope of the IS/MND, a Development Agreement is part of the project's entitlements which proposes millions of dollars in contributions for the City, in addition to the City's standard development impact fees. These contributions would go towards road maintenance, police, parks, education, local businesses and

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	we're going to have an empty -- completely autonomous distribution plant that provides no benefit to our city. You know, as an avid businessman this is a really good model, I'm not going to lie to you, but as a citizen of a city that I truly love, I really don't see it benefitting us in the future. So unless Amazon is fully committed to increasing the quality of life of our great city, whether that be creating a supporting community fund that improves our roads and schools, I will be against this motion. And so that is, that is all I got. Thank you so much. And -- and yeah, I love Upland, I really do.	other civic improvements. Additionally, Bridge's investment in the property and other off-site improvements could expand the City's tax revenue base in the future. The project will create 300 permanent jobs and these employees will want to eat and buy goods and services at neighboring stores. Not only will the Project be adding 1,000 new trees and nearly 11 acres of landscaping on the property, but the Project will also be paying for and installing new landscaping, curbs, gutters and sidewalks over approximately 1,000 linear feet of Foothill Boulevard as detailed in the Development Agreement. These improvements will enhance the aesthetics and attractiveness of the street and could make the currently vacant lots on Foothill more attractive to development, including retail. The Project could serve as an economic catalyst for the Foothill Blvd corridor that will have long-lasting tax revenue benefits for the City.
Marjorie Mikels		
I-42	You know it's significant, I haven't heard anybody talk about the fact that Amazon always locates near airports. They're trying to locate over at Norton where the largest plutonium pit probably in the world is over there and, you know, they're going to subject people to it. But what -- it is inconceivable to me that Amazon is touting this as a prototype. There's not going to be any drones and other things to use that airport to bring in goods and so forth. And we haven't talked about how much that's going to increase, you know, the burden on -- on our city. And then I -- I have to second what Ms. Terry said about the human trafficking. Now, we all remember when Steven Dunn left here as the City Manager and got taken in by Bob -- by -- Sorry, Bob Cable over there and then got his campaign for City Council supported by Welke, the big marijuana guy and who owns all the T&A outfits that are right next door to this airport. At the time when we know this Sonoma -- Sonola, what is that, gang from Mexico is bringing in pot and other stuff to the airport, you know, for	Per the CEQA Guidelines, the Project analyzes 20 resource categories. The comment is not related to an area of environmental analysis that is required to be evaluated under the CEQA Guidelines and is therefore out of the scope of the IS/MND analysis. Further, the scope of the City's Municipal Code does not provide authority for the City to determine or review the choice of tenant that may occupy the building. *Friends of Davis v. City of Davis* (2000) 83 Cal.App.4th 1004, 1013-14. The IS/MND thoroughly analyzed all thresholds required by the CEQA Guidelines and determined that the Project would result in no significant impacts after mitigation. Per CEQA Guidelines, threshold VI.11(b) of the IS/MND evaluated the consistency of the Project with the Cable Airport Land Use Compatibility Plan (ALUCP). The analysis found the Project to be consistent with the ALUCP and impacts would be less than significant. Further, threshold VI.9(e) of the IS/MND evaluated the impact of airport-related hazards. The analysis found that the proposed Project would be consistent with the conditions in Chapter 3 of the ALUCP for the C1, C2 and C3 zones and therefore, would not create a safety hazard for people residing or working in the Project area. The IS/MND provides a

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	distribution Welke's outfits and so forth, while the City is spending a million dollars to fight the only guy who was trying to -- I mean you know we have a -- a history here right? And we're putting this gateway of our city, we're going to put an Amazon distribution center right next door to the T&A. I know it's in the county and you can't control it but -- but we don't all know what is going to be permitted and distributed at our front door. Okay? Front door from Claremont. They're not asking to go to Claremont, they're asking to come to Upland, the gracious city because -- maybe they just don't like you guys to be scared I have a feeling Mr. Zimmerman has been fed a line that this is zoned for this and so you don't have any right to do this and so they might sue us and that would be horrible. Well, we know how Amazon treats people, they know how they spent over a million dollars to get rid of a City Councilwoman in Seattle who was trying to help -- to get the largest corporations in the world, we know Jeff Bezos is the richest guy in the world, okay, to try to get them and Starbucks and Boeing, you know, to kick in some money to get rid of the homeless. They fought tooth and nail. And Amazon spent a million dollars to get rid of that one Councilwoman and they lost. Okay. They lost. Because the people knew better. And you've got a lot of people out here tonight and you need to listen to them and we need to go for an EIR, okay, and -- you say oh, we don't have time, we have to get this in by next August or -- or else it just won't work, and -- and Amazon needs to step up to the plate. Okay? They won't even come and sign the contracts that you're going to try to impose them.	comprehensive and thorough analysis of the environmental impacts of the Project as required by the CEQA Guidelines. Accordingly, the IS/MND includes more than 1,800 pages of environmental analysis, including 10 technical studies and evaluated all required thresholds required by CEQA and City requirements. The proposed Project does not include drone activity, any future operations inconsistent with the Project analyzed in this IS/MND would be subject to separate environmental analysis. The Project is being reviewed in accordance with the existing City development review process. While the tenant has not been determined at this time, any future operation on the Project site would be subject to the same mitigation measures, conditions of approval and provisions contained in the Development Agreement as the proposed Project. Any future use on the Project site would be required to comply with the uses approved for the site. Accordingly, CEQA Guidelines provide that analysis is based on the operational and construction related environmental impacts of a project and does not consider the owner or prospective tenant in that analysis.
Letter from S. Bierbaum, dated December 30, 2020		
I-43	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	While economic impacts are outside the scope of the IS/MND, a Development Agreement is part of the project's entitlements which proposes millions of dollars in contributions for the City, in addition to the City's standard development impact fees. These contributions would go towards road maintenance, police, parks, education, local businesses and

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	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.	other civic improvements. The cost of street improvements to 13th Street, Foothill Boulevard, and Central Avenue are above and beyond both the Development Agreement contributions and the City required impact fees. With regard to road maintenance, in addition to the standard project fees which includes nearly $500,000 for roads (i.e., this is the amount the City collects to pay for new road improvements and maintenance as a result of any new project and it is based on the size and use of the project), the project's Development Agreement includes an annual contribution for road maintenance, with the term of the contribution to be determined as part of the public review process. This annual contribution is intended to replicate what the City could theoretically collect in sales tax from a retail project of similar size—however, at this dollar amount, the project's proposed annual contribution is the equivalent of a top 10 sales tax producer for the City. Additionally, while sales tax is variable (and mostly down over the last decade), and retail is generally declining, this would be guaranteed revenue for the City, and, again, would make the project one of the largest revenue sources for the City. The IS/MND thoroughly analyzed all thresholds required by the CEQA Guidelines and determined that the Project would result in no significant impacts after mitigation; impacts to traffic would be mitigated to a less than significant level. The number of trips expected to result from the Project was assessed as a part of the Traffic Impact Assessment prepared for the Project (Appendix H-1) and accounted for the trucks, vans, and passenger cars anticipated to utilize the Project. The commenter is correct that the project meets the zoning standards in the City's Municipal Code.
Letter from J. Delgado, dated January 12, 2020		
I-44	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.	Comment in support of the Project is noted.

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	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.	
Letter from K. Di Stefano, dated January 12, 2020		
I-45	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 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 preapproved 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 preapproval 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.	The Project is a warehouse facility consistent with Section 17.51.010 of the City’s Municipal Code which Code defines warehousing as the provision of facilities used primarily for the storage of commercial goods, including documents. The Project is located within the C/I-MU zone, and Section 17.05.020 of the City’s Municipal Code identifies warehousing as a permitted use within the C/I-MU zone. The General Plan is consistent with the Municipal Code and identifies that warehousing is an allowable use within the C/I-MU zone. The Project is also consistent the General Plan’s description of the C/I-MU zone as follows: “The Commercial/Industrial Mixed-Use designation is **designed to accommodate a variety of industrial** and regional retail uses and to support commercial activities to satisfy a range of shopping needs for residents of the community. **It is also intended to encourage development of business in the City and to maximize the potential for job generation.** Uses supported under this category include commercial and industrial. **Typical industrial uses could include limited general industrial, manufacturing, assembly, warehousing, multi-tenant industrial, research and development, and airport–related uses**. Typical commercial uses include retail commercial and durable sales goods, tourist-related commercial, entertainment, recreational uses, administrative and professional offices, commercial activities, business support services, food and institutional uses, as well as residential, subject to a reasonable minimum increment of land area as well as a special use permit process.” (emphasis added)

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		The Project is also consistent with the following General Plan policy of the City: "Policy LU-3.2 Economic Revitalization. Promote the development of vacant and underutilized parcels with higher intensity commercial and industrial land uses." The project does not in any way fit the definition of a truck terminal, and is correctly categorized as a warehouse. The US government defines types of businesses by Standard Industrial Classification (SIC). The proposed project fits squarely within Industry Group 422 (Public Warehousing and Storage) and Industry Group SIC Code 4225 – General Warehousing and Storage. The project does not fit within the SIC Industry Group 423 (Terminal and Joint Terminal Maintenance) or Industry Group 421, both of which include terminals operated by motor freight transportation companies. In addition, the ULI publication "Guide to Classifying Industrial Property" available online here: http://courses.washington.edu/cee320ag/warehousing/WarehouseClassification.pdf describes truck terminals as follows: "***Truck Terminals do not warehouse goods. Their sole function is to transfer goods from one truck to another***. Because of this function Truck Terminals are long and narrow in design. Because Truck Terminals transfer rather than store cargo, the facilities also have low ceiling heights. ***Most ceiling heights range from 12 to 16 feet, which is below the height of any facilities within the Warehouse Distribution category***." (emphasis added) The proposed project does not fit this definition of a truck terminal. The proposed project's warehouse will be used to store and then distribute goods directly to customers on vans. No goods will be transferred from one truck to another truck at the project's warehouse, for deliver to the next warehouse in the supply chain, as is the case for a truck terminal. Further, the proposed project's ceiling height is 36 feet, well above the 12 to 16 foot range that is typical for a truck terminal. The project's 36 foot ceiling height is very typical of warehouses that are required to store goods on site in order to optimize storage capacity. The low, 12-16 foot ceiling

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		height works for truck terminals because goods are immediately transferred from one truck to another, without storage. Therefore, the proposed project's warehouse fits neither the operational nor the physical characteristics of a truck terminal. The Project has not been pre-approved by the City of Upland, and no tenant has been identified or has been leased for this Project. the scope of the City's Municipal Code does not provide authority for the City to determine or review the choice of tenant that may occupy the building. *Friends of Davis v. City of Davis* (2000) 83 Cal.App.4th 1004, 1013-14. The Project, its entitlements, and the IS/MND will require approval from the City Council in order to proceed. Detailed technical studies analyzing the potential environmental impacts of the proposed Project determined that all impacts would be less than significant either before or after mitigation, therefore an IS/MND is the appropriate environmental document consistent with CEQA, and an EIR is not required. Nonetheless, all of the technical studies included in the Project's IS/MND are the exact same technical studies that would have been included in an EIR. Each study's level of detail and thorough, comprehensive analysis is the same between this Project's IS/MND and an EIR. Under CEQA, the only additional analysis that an EIR requires is an alternatives analysis to consider whether there are any alternatives that would reduce impacts that cannot be mitigated to less than significant. Here, because there are no significant impacts, CEQA does not require an alternatives analysis to try to reduce impacts.
Letter from V. Douglas, dated January 13, 2020		
I-46	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.	The project site is located in the Commercial/Industrial Mixed-Use (C/I-MU) zone of the City, and the proposed warehouse is therefore a permitted use for the property The Project is also consistent with the land uses surrounding the property, which includes Cable Airport and a rock quarry to the north, commercial uses to the south and east, and industrial uses to the west. There are already existing warehouses and industrial uses in the City of Upland, in designated and zoned areas where those uses are appropriate distances from homes, therefore this Project would not be the

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		first of this type of use in the City. The IS/MND thoroughly analyzed all thresholds required by the CEQA Guidelines and determined that the Project would result in no significant impacts after mitigation; impacts to traffic would be mitigated to a less than significant level. Peak hour trips (total in and out) was determined to add less than 5% of trips (including all employee and visitor truck, van and passenger cars) on Foothill Boulevard, approximately 2% on Benson Avenue, and less than 1% on Baseline Road
Letter from J. Fenning, dated January 11, 2020		
I-47a	Proposed Requirement #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.	The traffic study was comprehensive and analyzed traffic from all Project-related vehicles, including trucks, vans and employee vehicles. All of the Project's proposed vans were accurately accounted for in the traffic study, and the traffic study shows a total of 2,483 daily trips. During the peak hours (i.e. when the greatest number of cars are on the road in both the morning and afternoon), the Project will add less than 1% to the existing traffic on Baseline, approximately 2% to the existing traffic on Benson, and less than 5% to Foothill. All of the Project's trips would create less than a third of the traffic generated by retail store(s) the same size as the proposed Project, and would generate far less truck traffic. Therefore the proposed Project, even including all the Project vans, is a much lower traffic generator than other uses permitted by the zoning for this property. Additionally, the traffic study also overestimates the trips created by the Project, as it is based on a 276,000 square foot building, and the building was downsized further to only 201,000 square feet since preparation of the traffic study. That's a nearly 28% reduction compared to the building analyzed in the traffic study, therefore the trip generation will likely be even less than what's presented in the traffic study. Detailed technical studies analyzing the potential environmental impacts of the proposed Project determined that all impacts would be less than significant either before or after mitigation, therefore an IS/MND is the appropriate environmental document consistent with CEQA, and an EIR is not required. Nonetheless, all of the technical studies included in the Project's IS/MND are the exact same technical studies that would have

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	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.)	been included in an EIR. Each study's level of detail and thorough, comprehensive analysis is the same between this Project's IS/MND and an EIR. Under CEQA, the only additional analysis that an EIR requires is an alternatives analysis to consider whether there are any alternatives that would reduce impacts that cannot be mitigated to less than significant. Here, because there are no significant impacts, CEQA does not require an alternatives analysis to try to reduce impacts.
I-47b	Proposed Requirement #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	The comment does not raise any issues or address the adequacy of the IS/MND, and therefore does not require further response to comment.

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	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.	
I-47c	Proposed Requirement #3 Require alternative fueled vehicles will be used; current descriptions only involve recommendations/suggestions or exposure to programs that reduce vehicular emissions or install infrastructure for electric vehicles. • 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	While the IS/MND did not identify a significant GHG impact, the project has committed to further reducing GHG emissions through a number of new measures, including installation of solar panels on the building roof, EV chargers for 30 parking spaces, and EV-ready infrastructure for all trucks, all vans, and 50% of car parking spaces, among other measures. These new commitments are documented in the Supplemental GHG Report included as Attachment 2, and will be enforced through PDF-GHG-1 through PDF-GHG-5. As a result of this new solar commitment, the project building is projected to have **net-zero electricity consumption**.

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	company- owned energy efficient vehicle. • 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. 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	

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	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-47d	Proposed Requirement #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. 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.	Point of sale and tax revenue to the City is outside the scope of the environmental analysis in the IS/MND, the project's proposed Development Agreement provides for an annual contribution for road maintenance, with the term of the contribution to be determined as part of the public review process. This annual contribution would be just part of the project's multi-million dollar financial commitment to the City included in the proposed Development Agreement, and in addition to the $2.5 million in City fees that the project will also be paying. The annual contribution is intended to replicate what the City could theoretically collect in sales tax from a retail project of similar size—however, at this dollar amount, the project's proposed annual contribution is the equivalent of a top 10 sales tax producer for the City. Additionally, while

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		sales tax is variable (and mostly down over the last decade), and retail is generally declining, this would be guaranteed revenue for the City, and, again, would make the project one of the largest revenue sources for the City. Additionally, Bridge's investment in the property and other off-site improvements could expand the City's tax revenue base in the future. The project will create 300 permanent jobs and these employees will want to eat and buy goods and services at neighboring stores. Not only will the Project be adding 1,000 new trees and nearly 11 acres of landscaping on the property, but the Project will also be paying for and installing new landscaping, curbs, gutters and sidewalks over approximately 1,000 linear feet of Foothill Boulevard as detailed in the Development Agreement. These improvements will enhance the aesthetics and attractiveness of the street and could make the currently vacant lots on Foothill more attractive to development, including retail. The Project could serve as an economic catalyst for the Foothill Blvd corridor that will have long-lasting tax revenue benefits for the City.
I-47e	Proposed Requirement #5 Relocate to a location adjacent to the 210 Freeway, most likely north of the Campus ramp or 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. 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.	These comments and suggestions will be forwarded to the decisionmakers for comments. The comment does not raise any issues or address the adequacy of the IS/MND, and therefore does not require further response to comment. The Applicant is not aware of any available land for sale in the location suggested by the commenter. Under CEQA, an analysis of alternatives to the project is only required if the initial study concludes that there are impacts that cannot be mitigated to less than significant. Here, because there are no significant impacts, CEQA does not require an alternatives analysis to try to reduce impacts.

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Letter from R. Griffin, dated January 8, 2020		
I-48	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?	The project site is located in the Commercial/Industrial Mixed-Use (C/I-MU) zone of the City, and the proposed warehouse is therefore a permitted use for the property. The Project is also consistent with the land uses surrounding the property, which includes Cable Airport and a rock quarry to the north, commercial uses to the south and east, and industrial uses to the west. There are already existing warehouses and industrial uses in the City of Upland, in designated and zoned areas where those uses are appropriate distances from homes, therefore this Project would not be the first of this type of use in the City. With regard to road maintenance, in addition to the standard project fees which includes nearly $500,000 for roads (i.e., this is the amount the City collects to pay for new road improvements and maintenance as a result of any new project and it is based on the size and use of the project), the project's Development Agreement includes an annual contribution for road maintenance, with the term of the contribution to be determined as part of the public review process. This annual contribution is intended to replicate what the City could theoretically collect in sales tax from a retail project of similar size—however, at this dollar amount, the project's proposed annual contribution is the equivalent of a top 10 sales tax producer for the City. Additionally, while sales tax is variable (and mostly down over the last decade), and retail is generally declining, this would be guaranteed revenue for the City, and, again, would make the project one of the largest revenue sources for the City. While economic impacts are outside the scope of the IS/MND, a Development Agreement is part of the project's entitlements which proposes millions of dollars in contributions for the City, in addition to the City's standard development impact fees. These contributions would go towards road maintenance, police, parks, education, local businesses and other civic improvements. While no tenant has been identified for the proposed Project, as to the question about the ½ mile-long Amazon facility on Interstate 15, that facility, and very large facilities like it, are very different than the building

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		being proposed for Upland. That Amazon building is a huge warehouse than ships a very large volume of packages to other distribution centers potentially up to 100 miles away for further sorting and shipping. It only uses large trucks for distribution and does not send packages directly to people's homes. In contrast, the building proposed in Upland is a last-mile facility; this means that the proposed Project is much smaller, makes deliveries only to homes (not other warehouses), delivers only to nearby locations, and uses vans for deliveries rather than large trucks. The I-15 Amazon-type facility and the proposed Project are two different parts of a supply chain - both necessary for people to get their online goods, but which function very differently. Impacts to traffic would be mitigated to a less than significant level. The number of trips expected to result from the Project was assessed as a part of the Traffic Impact Assessment prepared for the Project (Appendix H-1) and accounted for the trucks, vans, and passenger cars anticipated to utilize the Project.
Letter from J. Herron, dated January 13, 2020		
I-49	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.	The project site is located in the Commercial/Industrial Mixed-Use (C/I-MU) zone of the City, and the proposed warehouse is therefore a permitted use for the property. The Project is also consistent with the land uses surrounding the property, which includes Cable Airport and a rock quarry to the north, commercial uses to the south and east, and industrial uses to the west. There are already existing warehouses and industrial uses in the City of Upland, in designated and zoned areas where those uses are appropriate distances from homes, therefore this Project would not be the first of this type of use in the City. Based on prior community feedback, the building square footage and the number of truck trips has been greatly reduced. As analyzed in the IS/MND, the building square footage is less than 10% of the 50-acre property and will include 11 acres of landscaping including 1,000 trees.. Views of mountains from Foothill Boulevard would continue to be partially obscured; however, the Project is setback more than 700 feet from Foothill Boulevard which reduces any potential obstruction of mountain views.

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		Furthermore, trees and existing buildings will serve to screen the building and van loading areas as viewed from Foothill Boulevard. The IS/MND thoroughly analyzed all thresholds required by the CEQA Guidelines and determined that the Project would result in no significant impacts after mitigation; impacts to traffic would be mitigated to a less than significant level. The number of trips expected to result from the Project was assessed as a part of the Traffic Impact Assessment prepared for the Project (Appendix H-1) and accounted for the trucks, vans, and passenger cars anticipated to utilize the Project. As analyzed in the IS/MND, a total of 25 trucks per day (total of 50 truck trips) would access the Project site, primarily overnight. Of these 25 trucks, 5 would access the Project during daytime hours, resulting in a reduction from current conditions.
Letter from J. Hinson, dated December 23, 2020		
I-50	This cannot happen in Upland!!!! I've seen it in Rosemead Ca. on Temple City Blvd, Amazon Flex... It's terrible, this project cannot be allowed. I will be there on February 12th to voice my opinion.	The project site is located in the Commercial/Industrial Mixed-Use (C/I-MU) zone of the City, and the proposed warehouse is therefore a permitted use for the property. The Project is also consistent with the land uses surrounding the property, which includes Cable Airport and a rock quarry to the north, commercial uses to the south and east, and industrial uses to the west. There are already existing warehouses and industrial uses in the City of Upland, in designated and zoned areas where those uses are appropriate distances from homes, therefore this Project would not be the first of this type of use in the City. The comment is noted. The comment does not raise any issues or address the adequacy of the IS/MND, and thus no further response is needed.
Letter from S. Ariannia, dated January 6, 2020		
I-51	The following 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	A full environmental study was prepared for the Project consistent with the requirements of the California Environmental Quality Act (CEQA). Detailed technical studies analyzing the potential environmental impacts of the proposed Project determined that all impacts would be less than significant either before or after mitigation, therefore an IS/MND is the appropriate environmental document consistent with CEQA, and an EIR is

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	necessary. 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 the 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. 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 deprecate. This may cause a future change in the City's culture and demographic.	not required. Nonetheless, all of the technical studies included in the Project's IS/MND are the exact same technical studies that would have been included in an EIR. Each study's level of detail and thorough, comprehensive analysis is the same between this Project's IS/MND and an EIR. Under CEQA, the only additional analysis that an EIR requires is an alternatives analysis to consider whether there are any alternatives that would reduce impacts that cannot be mitigated to less than significant. Here, because there are no significant impacts, CEQA does not require an alternatives analysis to try to reduce impacts. The IS/MND prepared for the Project thoroughly analyzed all thresholds required by the California Environmental Quality Act (CEQA) Guidelines and determined that the Project would result in no significant impacts after mitigation; impacts to traffic would be mitigated to a less than significant level. Peak hour trips (total in and out) was determined to add less than 5% of trips on Foothill Boulevard, approximately 2% on Benson Avenue, and less than 1% on Baseline Road. With regard to road maintenance, in addition to the standard project fees which includes nearly $500,000 for roads (i.e., this is the amount the City collects to pay for new road improvements and maintenance as a result of any new project and it is based on the size and use of the project), the project's Development Agreement includes an annual contribution for road maintenance, with the term of the contribution to be determined as part of the public review process. This annual contribution is intended to replicate what the City could theoretically collect in sales tax from a retail project of similar size—however, at this dollar amount, the project's proposed annual contribution is the equivalent of a top 10 sales tax producer for the City. Additionally, while sales tax is variable (and mostly down over the last decade), and retail is generally declining, this would be guaranteed revenue for the City, and, again, would make the project one of the largest revenue sources for the City. Impacts to property values are outside the scope of the environmental analysis of projects required under the CEQA Guidelines. Section 15131(a) of the CEQA Guidelines states that economic or social effects of a project shall not be treated as significant effects on the environment and that the focus of the analysis shall be on the physical changes taking place.

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		Economic or social changes may be used, however, to determine that a physical change shall be regarded as a significant effect on the environment. If the physical change causes adverse economic or social effects on people, those adverse effects may be used as a factor in determining whether the physical change is significant. A reduction in property values solely on economic effects and does not address environmental or physical concerns, nor does it demonstrate an adverse effect on people.
Letter from R. Kirby dated January 11, 2020		
I-52	I heard that a possible Amazon warehouse might be built in Upland. I am writing to ask you not to let this happen. 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	The tenant has not been determined at this time, however, CEQA Guidelines provide that analysis is based on the operational and construction related environmental impacts of a project and does not consider the owner or prospective tenant in that analysis. The scope of the City's Municipal Code does not provide authority for the City to determine or review the choice of tenant that may occupy the building. *Friends of Davis v. City of Davis* (2000) 83 Cal.App.4th 1004, 1013-14. Further, the site referenced by the commenter is not comparable to the proposed Project site. The Upland Project site would be 50 acres in size, and therefore have abundant space on-site that would avoid queuing on the public streets. Additionally, the Upland Project site has four driveways, and therefore is able to distribute traffic among these access points, further avoiding queuing. The IS/MND thoroughly analyzed all thresholds required by the CEQA Guidelines and determined that the Project would result in no significant impacts after mitigation; impacts to traffic would be mitigated to a less than significant level. The number of trips expected to result from the Project was assessed as a part of the Traffic Impact Assessment prepared for the Project (Appendix H-1) and accounted for the trucks, vans, and passenger cars anticipated to utilize the Project. Further, the peak hour trips (total in and out) was determined to add less than 5% of trips on Foothill Boulevard, approximately 2% on Benson Avenue, and less than 1% on Baseline Road.

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	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.	
Letter from S. Mach, dated January 12, 2020		
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	The Project is a warehouse facility consistent with Section 17.51.010 of the City's Municipal Code which Code defines warehousing as the provision of facilities used primarily for the storage of commercial goods, including documents. The Project is located within the C/I-MU zone, and Section 17.05.020 of the City's Municipal Code identifies warehousing as a permitted use within the C/I-MU zone. The General Plan is consistent with the Municipal Code and identifies that warehousing is an allowable use within the C/I-MU zone. The General Plan would not have to be amended to allow this project to be developed on the Project site. The Project is consistent the General Plan's description of the C/I-MU zone as follows: "The Commercial/Industrial Mixed-Use designation is **designed to accommodate a variety of industrial** and regional retail uses and to support commercial activities to satisfy a range of shopping needs for residents of the community. **It is also intended to encourage development of business in the City and to maximize the potential for job generation.** Uses supported under this category include commercial and industrial. **Typical industrial uses could include limited general industrial, manufacturing, assembly, warehousing, multi-tenant industrial, research and development, and airport–related uses**. Typical commercial uses include retail commercial and durable sales goods, tourist-related

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	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.	commercial, entertainment, recreational uses, administrative and professional offices, commercial activities, business support services, food and institutional uses, as well as residential, subject to a reasonable minimum increment of land area as well as a special use permit process." (emphasis added) The Project is also consistent with the following General Plan policy of the City: "Policy LU-3.2 Economic Revitalization. Promote the development of vacant and underutilized parcels with higher intensity commercial and industrial land uses." Detailed technical studies analyzing the potential environmental impacts of the proposed Project, including climate change, determined that all impacts would be less than significant either before or after mitigation, therefore an IS/MND is the appropriate environmental document consistent with CEQA, and an EIR is not required. Nonetheless, all of the technical studies included in the Project's IS/MND are the exact same technical studies that would have been included in an EIR. Each study's level of detail and thorough, comprehensive analysis is the same between this Project's IS/MND and an EIR. Under CEQA, the only additional analysis that an EIR requires is an alternatives analysis to consider whether there are any alternatives that would reduce impacts that cannot be mitigated to less than significant. Here, because there are no significant impacts, CEQA does not require an alternatives analysis to try to reduce impacts. The scope of the City's Municipal Code does not provide authority for the City to determine or review the choice of tenant that may occupy the building. *Friends of Davis v. City of Davis* (2000) 83 Cal.App.4th 1004, 1013-14. The project has not been pre-approved by the City of Upland, and no tenant has been identified or has been leased for this Project. The Project, its entitlements, and the IS/MND will require approval from the City Council in order to proceed.
Letter from I. Osuna, dated December 30, 2020		
I-54	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	Economic impacts are not part of the environmental analysis required under CEQA, therefore an Economic Impact Report was not a part of the IS/MND. Section 15131(a) of the CEQA Guidelines states that economic or

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	separate documents, what is the status of the DA and is it available for the public to review?	social effects of a project shall not be treated as significant effects on the environment and that the focus of the analysis shall be on the physical changes taking place. A Development Agreement is a separate document that identifies contractual agreements between the City and the Developer of a project. The Development Agreement for the proposed Project will be shared publicly prior to the first City Planning Commission vote on the project, and will be subject to approval by the City Council. While economic impacts are outside the scope of the IS/MND, a Development Agreement is part of the project's entitlements which proposes millions of dollars in contributions for the City, in addition to the City's standard development impact fees. These contributions would go towards road maintenance, police, parks, education, local businesses and other civic improvements.
Letter from A. Shen dated January 8, 2020		
I-55	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: • **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	The IS/MND prepared for the Project is a comprehensive document that thoroughly analyzes all thresholds required by the CEQA Guidelines. In accordance with the CEQA Guidelines, the IS/MND evaluated the required environmental analysis of 20 environmental areas. Further, the IS/MND overestimates the Project's environmental impacts as it analyzed a 276,250 sf building; the Project has since been further reduced in size by 75,154 sf, or nearly 28% to the currently proposed 201,096 sf building. There is ample and sufficient parking proposed on the site for both employee cars and vans. The Traffic Impact Assessment (TIA) prepared for the Project (Appendix H-1) accounted for the number of trips expected to result from the Project including the anticipated trucks, vans, and passenger cars expected to utilize the Project as either visitors or employees and found the impact to be less than significant with mitigation incorporated. As discussed in the IS/MND and the traffic study, the Project would result in a maximum of 5 trucks during daytime hours, resulting in a reduction from current conditions. The traffic study found that the Project would not

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	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.	conflict with the adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities and would not decrease the performance or safety of such facilities. Additionally, the traffic study also overestimates the trips created by the Project, as it is based on a 276,000 square foot building, and the building was downsized further to only 201,000 square feet since preparation of the traffic study. That's a nearly 28% reduction compared to the building analyzed in the traffic study, therefore the trip generation will likely be even less than what's presented in the traffic study. The tenant has not been determined at this time, however, CEQA Guidelines provide that analysis is based on the operational and construction related environmental impacts of a project and does not consider the owner or prospective tenant in that analysis. The scope of the City's Municipal Code does not provide authority for the City to determine or review the choice of tenant that may occupy the building. *Friends of Davis v. City of Davis* (2000) 83 Cal.App.4th 1004, 1013-14. The project site is located in the Commercial/Industrial Mixed-Use (C/I-MU) zone of the City, and the proposed warehouse is therefore a permitted use for the property. . The Project is also consistent with the land uses surrounding the property, which includes Cable Airport and a rock quarry to the north, commercial uses to the south and east, and industrial uses to the west. There are already existing warehouses and industrial uses in the City of Upland, in designated and zoned areas where those uses are appropriate distances from homes, therefore this Project would not be the first of this type of use in the City
Letter from S. Van Tine, dated January 4, 2020		
I-56	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	Comment in support of the Project is noted.

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	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.	
Letter from B. Sarathy, dated January 5, 2020		
I-57	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). 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.	As discussed in the IS/MND, per the City's standard practice and in accordance with Assembly Bill 52 (AB 52), including Section 21080.3.1(d), the City circulated letters via certified mail on August 7, 2018 to the Gabrieleño Band of Mission Indians – Kizh Nation and the San Manuel Band of Mission Indians to request comments and input on the proposed Project and the potential to affect Tribal and Cultural Resources.
Letter from L. Poe, dated January 13, 2020		
I-58	Wondering if an EIR or a CMP or a TIA has been done on this project. Curious if the traffic impact and congestion this could possibly have on our community. I'll be reaching out to SANBAG/SBCTC to enquire more info. I might also reach out to SCAQMD as well.	A TIA (traffic impact assessment) based on the guidelines from the SBCTA Congestion Management Program (CMP) is included as Appendix H-1 of the IS/MND. The IS/MND was also sent to the State Clearinghouse for distribution to state and regional agencies including SCAQMD. The TIA determined that even with all of the Project-related vehicles,

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		including trucks, vans and employee vehicles, during the peak hours (i.e. when the greatest number of cars are on the road in both the morning and afternoon), the Project will add less than 1% to the existing traffic on Baseline, approximately 2% to the existing traffic on Benson, and less than 5% to Foothill. All of the Project's trips would create less than a third of the traffic generated by retail store(s) the same size as the proposed Project, and would generate far less truck traffic. Therefore, the proposed Project, even including all the Project vans, is a much lower traffic generator than other uses permitted by the zoning for this property. Additionally, the traffic study also overestimates the trips created by the Project, as it is based on a 276,000 square foot building, and the building was downsized further to only 201,000 square feet since preparation of the traffic study. That's a nearly 28% reduction compared to the building analyzed in the traffic study, therefore the trip generation will likely be even less than what's presented in the traffic study. Detailed technical studies analyzing the potential environmental impacts of the proposed Project determined that all impacts would be less than significant either before or after mitigation, therefore an IS/MND is the appropriate environmental document consistent with CEQA, and an EIR is not required. Nonetheless, all of the technical studies included in the Project's IS/MND are the exact same technical studies that would have been included in an EIR. Each study's level of detail and thorough, comprehensive analysis is the same between this Project's IS/MND and an EIR. Under CEQA, the only additional analysis that an EIR requires is an alternatives analysis to consider whether there are any alternatives that would reduce impacts that cannot be mitigated to less than significant. Here, because there are no significant impacts, CEQA does not require an alternatives analysis to try to reduce impacts. The IS/MND provides a comprehensive and thorough analysis of the environmental impacts of the Project as required by the CEQA Guidelines. Accordingly, the IS/MND includes more than 1,800 pages of environmental analysis, including 10 technical studies and evaluated all required thresholds required by CEQA and City requirements.

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Letter from B. Andresen, dated January 15, 2020		
I-59	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.	The Project's traffic study includes and analyzes all Project-related vehicles, including trucks, vans and employee vehicles and analyzed these vehicles traveling to and from the facility on Foothill Boulevard. During the peak hours (i.e. when the greatest number of cars are on the road in both the morning and afternoon), the traffic generated by the Project will add less than 1% to the existing traffic on Baseline, approximately 2% to the existing traffic on Benson, and less than 5% to Foothill. All of the Project's trips would create less than a third of the traffic generated by retail store(s) the same size as the proposed Project, and would generate far less truck traffic. Therefore, the proposed Project, even including all the Project vans and employee cars, is a much lower traffic generator than other uses permitted by the zoning for this property. Additionally, the traffic study also overestimates the trips created by the Project, as it is based on a 276,000 square foot building, and the building was downsized further to only 201,000 square feet since preparation of the traffic study. That's a nearly 28% reduction compared to the building analyzed in the traffic study, therefore the trip generation will likely be even less than what's presented in the traffic study. Additionally, the Project will be implementing a number of street improvements. As identified in the Project's traffic study, the Project is proposing to restripe the northbound lanes on Benson and the Benson/Baseline intersection to add another left turn lane onto Baseline. This would result in one left-turn only lane, one left-turn/through lane, and one through/right-turn lane at this intersection. As will be identified in the Project's Development Agreement, the Project will be adding a median on Foothill Boulevard next to the site to ensure that access is right-in and right-out only at the Foothill Boulevard driveways to the property, avoiding left-turns across this street (the Project will also being making street improvements on Foothill, discussed further below). The Project will also completely repave 13th street to Benson, and make significant upgrades to Central Ave. Finally, compared to the dozens of large trucks that drive to and from the

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	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.	site currently, the Project will have a maximum of only 5 trucks during the daytime, which is a considerable reduction in truck traffic. While economic impacts are outside the scope of the IS/MND, a Development Agreement is part of the project's entitlements which proposes millions of dollars in contributions for the City, in addition to the City's standard development impact fees. These contributions would go towards road maintenance, police, parks, education, local businesses and other civic improvements. Additionally, Bridge's investment in the property and other off-site improvements could expand the City's tax revenue base in the future. The Project will create 300 permanent jobs, and those employees will want to eat and buy goods and services at neighboring stores. Not only will the Project be adding 1,000 new trees and nearly 11 acres of landscaping on the property, but the Project will also be paying for and installing new landscaping, curbs, gutters and sidewalks over approximately 1,000 linear feet of Foothill Boulevard as detailed in the Development Agreement. These improvements will enhance the aesthetics and attractiveness of the street and could make the currently vacant lots on Foothill more attractive to development, including retail. The Project could serve as an economic catalyst for the Foothill Blvd corridor that will have long-lasting tax revenue benefits for the City.
Letter from B. Done, dated January 16, 2020		
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	The Project site is located in the Commercial/Industrial Mixed-Use (C/I-MU) zone of the City, and the proposed warehouse is therefore is a permitted use for the property.. The Project is also consistent with the land uses surrounding the property, which includes Cable Airport and a rock quarry to the north, commercial uses to the south and east, and industrial uses to the west. There are already existing warehouses and industrial uses in the City of Upland, in designated and zoned areas where those uses are appropriate distances from homes, therefore this Project would not be the first of this type of use in the City. The IS/MND prepared for the Project thoroughly analyzes all thresholds

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	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	required by the CEQA Guidelines. In accordance with the CEQA Guidelines, the IS/MND evaluated the required environmental analysis of 20 environmental areas. Further, the IS/MND overestimates the Project's environmental impacts as it analyzed a 276,250 sf building; the Project has since been further reduced in size by 75,154 sf, or nearly 28% to the currently proposed 201,096 sf building. While economic impacts are outside the scope of the IS/MND, a Development Agreement is part of the project's entitlements which proposes millions of dollars in contributions for the City, in addition to the City's standard development impact fees. These contributions would go towards road maintenance, police, parks, education, local businesses and other civic improvements. With regard to road maintenance, in addition to the standard project fees which includes nearly $500,000 for roads (i.e., this is the amount the City collects to pay for new road improvements and maintenance as a result of any new project and it is based on the size and use of the project), the project's Development Agreement includes an annual contribution for road maintenance, with the term of the contribution to be determined as part of the public review process. This annual contribution is intended to replicate what the City could theoretically collect in sales tax from a retail project of similar size—however, at this dollar amount, the project's proposed annual contribution is the equivalent of a top 10 sales tax producer for the City. Additionally, while sales tax is variable (and mostly down over the last decade), and retail is generally declining, this would be guaranteed revenue for the City, and, again, would make the project one of the largest revenue sources for the City. Per CEQA Guidelines, threshold VI.15(a) of the IS/MND evaluated the impact of the Project on fire and police services as well as other public facilities. The analysis found that although the proposed Project would place an additional demand on existing fire and police services, per Section 3.44.050 of the City's Municipal Code, the Project would be subject to development impact fees for general government, fire and police services established upon issuance of Project building permits. The IS/MND thoroughly analyzed all thresholds required by the CEQA

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	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 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.	Guidelines and determined that the Project would result in no significant impacts after mitigation; impacts to air quality and traffic, including pedestrian safety, would be mitigated to a less than significant level. The number of trips expected to result from the Project was assessed as a part of the Traffic Impact Assessment prepared for the Project (Appendix H-1) and accounted for the trucks, vans, and passenger cars anticipated to utilize the Project. Peak hour trips (total in and out) was determined to add less than 5% of trips (including all employee and visitor truck, van and passenger cars) on Foothill Boulevard, approximately 2% on Benson Avenue, and less than 1% on Baseline Road. Further, the traffic study found that the Project would not conflict with the adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities and would not decrease the performance or safety of such facilities. Speculation that persons will break the law is not required to be considered under CEQA as the City is allowed to presume compliance with laws. Additionally, the traffic study also overestimates the trips created by the Project, as it is based on a 276,000 square foot building, and the building was downsized further to only 201,000 square feet since preparation of the traffic study. That's a nearly 28% reduction compared to the building analyzed in the traffic study, therefore the trip generation will likely be even less than what's presented in the traffic study.
Letter from R. Gray, dated January 16, 2020		
I-61	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!	The Project is located in the Commercial/Industrial Mixed-Use (C/I-MU) zone of the City, and therefore is a permitted use for the property. The Project is also consistent with the land uses surrounding the property, which includes Cable Airport and a rock quarry to the north, commercial uses to the south and east, and industrial uses to the west. There are already existing warehouses and industrial uses in the City of Upland, in designated and zoned areas where those uses are appropriate distances from homes, therefore this Project would not be the first of this type of use in the City. The IS/MND provides a comprehensive and thorough analysis of the environmental impacts of the Project as required by the CEQA Guidelines.

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		Accordingly, the IS/MND includes more than 1,800 pages of environmental analysis, including 10 technical studies and evaluated all required thresholds required by CEQA and City requirements. The number of trips expected to result from the Project was assessed as a part of the Traffic Impact Assessment prepared for the Project (Appendix H-1) and accounted for the trucks, vans, and passenger cars anticipated to utilize the Project. Peak hour trips (total in and out) was determined to add less than 5% of trips (including all employee and visitor truck, van and passenger cars) on Foothill Boulevard, approximately 2% on Benson Avenue, and less than 1% on Baseline Road. Additionally, the traffic study also overestimates the trips created by the Project, as it is based on a 276,000 square foot building, and the building was downsized further to only 201,000 square feet since preparation of the traffic study. That's a nearly 28% reduction compared to the building analyzed in the traffic study, therefore the trip generation will likely be even less than what's presented in the traffic study. Per CEQA Guidelines, threshold VI.15(a) of the IS/MND evaluated the impact of the Project on fire and police services as well as other public facilities. The analysis found that although the proposed Project would place an additional demand on existing fire and police services, per Section 3.44.050 of the City's Municipal Code, the Project would be subject to development impact fees for general government, fire and police services established upon issuance of Project building permits. Furthermore, the Project would be compliant with General Plan policies, including Policy PFS-2.11, which requires new development to be accessible to emergency vehicles and to not impede the ability of service providers to provide adequate emergency response. The Project would include improvements along Central Avenue and 13th Street which would comply with the requirement to maintain adequate access for emergency response. Impacts to property values are outside the scope of the environmental analysis of projects required under the CEQA Guidelines. Section 15131(a) of the CEQA Guidelines states that economic or social effects of a project shall not be treated as significant effects on the environment and that the focus of the analysis shall be on the physical changes taking place.

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		Economic or social changes may be used, however, to determine that a physical change shall be regarded as a significant effect on the environment. If the physical change causes adverse economic or social effects on people, those adverse effects may be used as a factor in determining whether the physical change is significant. Detailed technical analyses prepared for the proposed Project resulted in less than significant impacts for all resources required to be evaluated under CEQA. Therefore, an Environmental Impact Report is not required. An IS/MND is the most appropriate CEQA document for this Project. Nevertheless, all thresholds evaluated in an EIR are also evaluated in the IS/MND. The analysis in this IS/MND and technical appendices adheres to the same regulatory requirements as an EIR.
Letter from C. Cushman, dated January 3, 2020		
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	No tenant has been identified for this Project, and the scope of the City's Municipal Code does not provide authority for the City to determine or review the choice of tenant that may occupy the building. *Friends of Davis v. City of Davis* (2000) 83 Cal.App.4th 1004, 1013-14. Additionally, any tenant that operates the proposed building will be required to abide by all mitigation measures, conditions of approval, and commitments made in the Development Agreement adopted for this Project, and be consistent with the environmental analysis contained in the IS/MND. Accordingly, CEQA Guidelines provide that analysis is based on the operational and construction related environmental impacts of a project and does not consider the owner or prospective tenant in that analysis. A detailed traffic analysis was included in the IS/MND that included all project-related traffic. Even with all of the project-related vehicles, including trucks, vans and employee vehicles, during the peak hours (i.e. when the greatest number of cars are on the road in both the morning and afternoon), the project will add less than 1% to the existing traffic on Baseline, approximately 2% to the existing traffic on Benson, and less than 5% to Foothill. All of the project's trips would create less than a third of the traffic generated by retail store(s) the same size as the proposed project, and would generate far less truck traffic. Therefore the proposed project,

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	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.	even including all the project vans, is a much lower traffic generator than other uses permitted by the zoning for this property. Additionally, the traffic study also overestimates the trips created by the project, as it is based on a 276,000 square foot building, and the building was downsized further to only 201,000 square feet since preparation of the traffic study. That's a nearly 28% reduction compared to the building analyzed in the traffic study, therefore the trip generation will likely be even less than what's presented in the traffic study. While tax revenue to the City is outside the scope of the environmental analysis in the IS/MND, the project's proposed Development Agreement provides for an annual contribution for road maintenance, with the term of the contribution to be determined as part of the public review process. This annual contribution would be just part of the project's multi-million dollar financial commitment to the City included in the proposed Development Agreement, and in addition to the $2.5 million in City fees that the project will also be paying. The annual contribution is intended to replicate what the City could theoretically collect in sales tax from a retail project of similar size—however, at this dollar amount, the project's proposed annual contribution is the equivalent of a top 10 sales tax producer for the City. Additionally, while sales tax is variable (and mostly down over the last decade), and retail is generally declining, this would be guaranteed revenue for the City, and, again, would make the project one of the largest revenue sources for the City. The project's traffic study included and analyzed a list of related project identified by the Cities of Upland, Claremont and Montclair.
Letter from E. Nilsson, dated January 17, 2020		
I-63a	Summary The submitted *Air* Qualify *Assessment* and *Greenhouse* Gas *Emissions Assessment:*	The commenter[15] identifies one typographical error in the operational emissions table in the Air Quality and Greenhouse Gas Assessments (identified as Appendix A and Appendix B, respectively, in the IS/MND) that does not affect the IS/MND analysis or conclusions. The typographic error

[15] While Professor Nilsson is a professor of economics, he did not provide any evidence of expertise on the matters of air quality or air quality modeling.

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	• 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) 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 §2l080(d)). The *Air* Qualify *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* Qualify *Assessment* uses a table, "Long-Term Operational Emissions (Maximum Pounds Per Day)[11], to support the claim that the "Project's net emissions would not exceed SCAQMD operation thresholds."[12] This table appears as Exhibit #1 in Appendix I below.	reported 100.38 instead of 110.38 pounds per day. As noted in the comment, these values are associated with carbon monoxide (CO) emissions. Notably, the SCAQMD's thresholds for CO are 550 pounds per day. As such, the typographical error has no affect on the conclusions of the analysis or the magnitude and severity of emissions. The other discrepancies identified in the comment are due to the inclusion of a previous version of CalEEMod outputs in the IS/MND's Appendices. The CalEEMod outputs shown in IS/MND Appendix A and Appendix B are from a previous CalEEMod model run dated September 26, 2019. Subsequent to that analysis, the trip generation rate was increased slightly to match the traffic study. The CalEEMod run was updated on October 9, 2019 and represents the most current/accurate results and are reflected in the Air Quality and Greenhouse Gas Emissions IS/MND sections. Therefore, the main text of the IS/MND includes the current and accurate results of the CalEEMod analysis, and the associated October 9, 2019 CalEEMod runs have now been included in responses to comments as Attachment 8. The discrepancies noted are extremely minor and do not alter the results, conclusions, or magnitude of impacts presented in the IS/MND.

[11] 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* Qualify *A55e55ment,* Volume 2 of the *Mitigated Negative Declaration.*

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	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.[13] 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 error14. 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 appearing in the Appendix to the Assessment, 5 fail to match their alleged	

[13] Appendix A—1, *Air* Qualify *A5Se55ment, p.* 23.

[13] 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* Qualify *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.

[14] Page 22 of the Greenhouse Gas Emissions Assessment found in Volume 2 of the MND

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	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-63b	**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. Such a reader would be wrong. **III. Implausible Model Inputs** Both the *Air* Qualify *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.	The comment provides a general summary of CalEEMod and suggests the use of (some) default assumptions in the CalEEMod run are incorrect, however only identifies one example. It should be noted that CalEEMod was developed for the California Air Pollution Officers Association (CAPCOA) in collaboration with the California Air Districts. Default data (e.g., emission factors, trip lengths, meteorology, source inventory, etc.) have been provided by the various California Air Districts to account for local requirements and conditions. Sources of these methodologies and default data include but are not limited to the United States Environmental Protection Agency (USEPA) AP-42 emission factors, California Air Resources Board (CARB) vehicle emission models, studies commissioned by California agencies such as the California Energy Commission (CEC) and CalRecycle. In addition, some local air districts provided customized values for their default data and existing regulation methodologies for use for projects located in their jurisdictions. CalEEMod utilizes widely accepted methodologies for estimating emissions combined with default data that should be used when site-specific information is not available. Changes to

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	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, 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	default data must be supported by substantial evidence. Therefore, the CalEEMod inputs were modified using available Project specific information to ensure that the emissions inventory reasonably represents the Project including, land use subtypes and quantities, mobile trip rates, fleet mix assumptions, on-site equipment (i.e., forklifts), and assumptions to reflect water and solid waste reductions related to code compliance. Specifically, the commenter suggests the default number of days per year used for the proposed warehouse forklifts (260) is too low, and that the appropriate number should be 365 days per year. It should be noted that the assumption is intended to represent average use. The 260 days-per-year assumption for forklift operations used in the CalEEMod run is conservative, as it assumes the simultaneous operation of 12 CNG forklifts for 8 hours each per day. In reality, the forklifts would most likely operate on an as-needed basis and have variable use (i.e., the total hours used in a single day could vary). Nonetheless, Project Design Feature GHG-5 has been added to the project, which requires the use of only electric powered forklifts. Therefore, the project's electric forklifts would generate minimal GHG emissions (79 $MTCO_2e$/year) compared to the conservative emissions shown in the IS/MND (211 $MTCO_2e$/year). Furthermore, increasing the number of days per year to 365 (i.e., 12 electric forklifts operating simultaneously for 8 hours each per day) would result in approximately 111 $MTCO_2e$/year, which is still much less than the conservative Project emissions of 211 $MTCO_2e$/year included in the IS/MND. The refined emissions for electric forklifts are shown in the "Off-Road" line item in the Supplemental GHG Analysis, included as Attachment 2. Additionally, as noted in the Supplemental GHG Analysis (provided for informational purposes to refine Project emissions to show the benefit of various Project Design Features), the Project's total emissions would remain below 3,000 $MTCO_2e$/year. Therefore, the commenter's suggestion to increase the number of days for forklift operations to 365 would not change the less than significant findings in the IS/MND.

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	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 "trips"	The Commenter's suggestion that the Project's vehicle trips are underestimated cites to one study as its source but then is based on speculative and inaccurate characterization of the project in applying that data. The commenter assumes that the Project will be an Amazon distribution facility, which is speculative. Under CEQA Guidelines Section 15384, argument, speculation, unsubstantiated opinion or narrative does not constitute substantial evidence. (*Pala Band of Mission Indians v. County of San Diego* (1998) 68 Cal.App.4th 556, 580.) The City's Municipal Code does not require identification of a future tenant nor does CEQA apply to specific choice of tenants. *Friends of Davis v. City of Davis* (2000) 83 Cal.App.4th 1004, 1013-14. Moreover, as explained below, even if the

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* warehouse were used by Amazon or a similar business, the IS/MND properly evaluates potential traffic impacts and the related air quality and GHG emissions.

First, the commenter disagrees with the use of the Institute of Transportation Engineers (ITE), but ITE is the authority on trip generation used by essentially every lead agency in California. ITE bases trip generation for all types of warehouses on building square footage because building square footage represents the total delivery capacity of a building. For a last mile facility like the proposed project, the number of van deliveries is capped by the size, i.e. capacity, of the building to sort and store goods for delivery. Further, in this case, the capacity of the building is limited due to the cap on daily trucks, which is limited to 25 trucks/50 truck trips per day through enforceable Conditions of Approval that the Applicant has agreed to.

Based on its size and location, this warehouse building cannot be used as a fulfillment center, but will rather be used as a last mile facility that is the last step in the warehouse supply chain before a package reaches a customer. ITE's High Cube Parcel Hub Warehouse trip rate reflects delivery/shipping operations directly to customers, which is the closest approximation to a last mile facility like the one proposed by the project.

As explained in a 2017 study by the Texas A&M Transportation Institute's report PRC 17-79 "How Will E-commerce Growth Impact Our Transportation Network?" (available online here: https://static.tti.tamu.edu/tti.tamu.edu/documents/PRC-17-79-F.pdf), which is based on Amazon, there are many steps in the ecommerce supply chain. Fulfillment centers are one of the first steps in the warehouse supply chain. Boxes are packed in fulfillment centers, and then shipped out to another layer of warehouse. Amazon's most recent fulfillment centers are generally between 500,000 to 1,200,000 square feet in size. Last mile warehouses are much smaller in size and have much different operational characteristics related to the storage of goods, including much higher proportion of automobile trips than trucks.

As the proposed project is only approximately 201,000 square feet in size and will be 98% automobile trips (i.e., 2,446 daily vehicle trips would be non-trucks out of the total 2,483 trips), it does not have the physical footprint (size) or operational characteristics to support the packing and

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	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* Qualify *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.* 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.[16] This higher trip rate is likely due to the greater	shipping activities of an Amazon fulfillment center-type facility. Thus, the Project will not fit the trip generation characteristics of a fulfillment center. The commenter's footnote 5 cites to one trip generation study conducted for the Western Riverside Council of Governments (WRCOG) to support claims that the trip generation used for the project is inaccurate. The WRCOG study does not include any last mile warehouse. The WRCOG study surveyed 11 Fulfillment Centers all greater than 300,000 square feet in size (indicating that they are not last mile warehouse). Exhibit 6 on page 7 of the WRCOG study shows the trip generation rates (see below). Using these rates, a 201,000 square foot facility would generate 25 trips in the a.m. peak hour, 33 trips in the p.m. peak hour, and 427 daily trips. That is a much smaller number of trips than the 198 trips in the a.m. peak hour, 198 trips in the p.m. peak hour, and 2,483 daily trips analyzed in the Project traffic study and IS/MND. Therefore, using the WRCOG trip rates that the commenter suggests would have generated much lower trip estimates for the project than studied in the IS/MND. Furthermore, the Applicant has agreed to enforceable Conditions of Approval that would limit the Project trucks to a maximum of 5 during the daytime, and 25 in total per day (for a total of 50 truck trips). Thus, the commenter's reliance on this one study is misplaced with respect to the IS/MND's analysis of traffic impacts.

[16] 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.

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	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[17]. 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.[18] 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.[19] 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 would count as only a single trip. Amazon will not, of course, load up these trailers at their last-mile delivery center.	**Exhibit 6: Summary of Trip Generation Rates per Thousand Square Feet of Gross Floor Area fo Fulfillment Centers** | Vehicle Class | AM Peak Hour | | PM Peak Hour | | Daily | | | | Conventional Warehouse* | Fulfillment Center | Conventional Warehouse | Fulfillment Center | Conventional Warehouse | Fulfillment Center | | Cars | 0.057 | 0.103 | 0.086 | 0.144 | 1.000 | 1.750 | | 2-4 Axle Trucks | 0.009 | 0.008 | 0.013 | 0.011 | 0.221 | 0.162 | | 5-Axle Trucks | 0.015 | 0.011 | 0.010 | 0.010 | 0.233 | 0.217 | | Total | 0.082 | 0.122 | 0.108 | 0.165 | 1.432 | 2.129 | | % Higher than Conventional | | 49% | | 52% | | 49% | * Transload, Short-Term Storage category in 2016 TIE/ NAIOP/ SCAQMD study The comment also states that the WRCOG study identifies one Amazon facility, that was approximately 1,250,000 square feet in size, as a statistical outlier. While a tenant has not been identified for the project, even assuming that Amazon could be a potential future tenant, using the WRCOG trip rate for this one Amazon facility would result in the project's 201,000 square foot facility generating 80 trips in the a.m. peak hour, 113 trips in the p.m. peak hour, and 917 daily trips. That is still far less than the 198 trips in the a.m. peak hour, 198 trips in the p.m. peak hour, and 2,483 daily trips analyzed in the Project traffic study and IS/MND. Therefore, the Project's traffic study estimates a higher number of trips and remains conservative when compared to the data in the sources cited by the commenter.

[17] https://www.mbvans.com/sprinter/commercial—vans/cargo—van.

[18] https://en.wikipedia.org/wiki/Isuzu_Reach.

[19] 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.

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	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-	

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	mile center will be 25.[20] 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.[21] If so, this means 775 van 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. 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.	

[20] 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.

[21] 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, 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.

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I-63d	C. *Inappropriate Use Of Default TripLength* 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.[22] 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. 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	The Commenter inaccurately presents one component of the model information (i.e., one of three trip lengths used in the model) and omits other relevant information by assuming that the "default" trip length of 6.9 miles for delivery trips renders the traffic analysis inaccurate. This is not correct. As explained below, the analysis includes weighted averages of different trip lengths and the average primary trip length in the analysis is actually 12.6 miles for the warehouse land use. Furthermore, these are one-way trip lengths and the round-trip length used in the model is actually 25.2 miles. Additionally, the Commenter's greater suggested trip lengths are speculative and unsubstantiated. Under CEQA Guidelines Section 15384, argument, speculation, unsubstantiated opinion or narrative does not constitute substantial evidence. (*Pala Band of Mission Indians v. County of San Diego* (1998) 68 Cal.App.4th 556, 580.). As discussed further below, when weighted according to the CalEEMod default trip type distribution and methodology the average primary one-way trip length in the analysis is actually 12.6 miles for the warehouse land use, which includes trip lengths that vary from 6.9 miles to 16.6 miles in length. Trip lengths used in the analysis were calculated using CalEEMod™ developed for California Air Pollution Officers Association (CAPCOA). This is a standard and accepted model used by all lead agencies in the preparation of environmental documents and analyses, including the City of Upland. CalEEMod™ calculates average trip length based on methodology described in CalEEMod™ Appendix A, Section 5.1. As indicated above, the 6.9-mile distance is only one component of the formula that is used to calculate average trip length based on district or county specific data. Three different distance categories were included in the model, which includes a 6.9 mile trip length, an 8.4 mile trip length, and a 16.6 mile trip length. (Refer to the CalEEMod User's Guide, Appendix D, Table 4.2, Mobile Trip Characteristics Dependent on Location, page D-

[22] 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: Calculator Detail 5 f OF CalE£Mod),* "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).

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	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. 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.[23]	86 [October 2017].) Taken together, and weighted according to the methodology described Appendix A, Section 5.1 of the CalEEMod User's Guide, the average primary trip length would be 12.6 miles one-way, and 25.2 miles round trip, for the project. Based on the approach used to generate the emission inventory, the weighted average trip length is the appropriate consideration of what delivery vehicle trip length was analyzed in the IS/MND. The trip lengths for the Project are therefore based on accepted and standard methodology. Further, the Project is a last mile warehouse that would be the final point of storage before distribution of goods to customers' doorsteps. Research conducted for newly-opened last mile warehouse indicates that trip lengths are typically between 6 to 9 miles from the population centers they serve.[24] This suggests that the average primary one-way trip length of 12.6 miles used for the Project, based on CalEEMod, is reasonable and conservative and may overestimate the actual delivery trip length. Finally, the estimated trip length assumed in the IS/MND likely results in a significant overestimation of the new vehicle miles actually resulting from the Project because it assumes that all trips to and from the Project are "new", rather than replacement or redistribution of trips that already exist. For example, the Project would be delivering packages that, primarily, would already be traveling to people's homes on trucks and vehicles, but from farther distances than this Project's proposed last-mile facility. Current deliveries to the Project area likely occur from the next

[23] 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 mi1es_is_average_did_my first_del ivery/, https://www.reddit.com/r/AmazonFlexDrivers/comments/732z79/average_mi1es_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=Ibobafoilaqhlbsp, https://www.moneypixels.com/rideshare/how—to—keep—your—costs—low—while—driving—for—amazon—flex

[24] Logistics Management, *Last-Mile Deliveries Tend To Run Closer to 6-to-9 Miles, Says CBRE Research*, July 13, 2017.
Available at: https://www.logisticsmgmt.com/article/last_mile_deliveries_tend_to_run_closer_to_6_to_9_miles_says_cbre_research, accessed January 23, 2019 and CBRE, *What is the Last Mile?*, 2018. Available at: http://www.cbre.us/real-estate-services/real-estate-industries/omnichannel/the-definitive-guide-to-omnichannel-real-estate/retailing/what-is-the-importance-of-the-last-mile, accessed January 23, 2019.

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		closest e-commerce facilities in Los Angeles or Chino, resulting in longer trip lengths without the Project. Therefore, the Project would largely be replacing and reducing existing trips, and associated greenhouse gas and air quality emissions.
I-63e	***IV.*** **Should We Believe the *Air Quality Assessment* or the *Greenhouse Gas Emissions Assessment?*** 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. 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.	As demonstrated in the responses above, the IS/MND appropriately estimated the number of trips and trip lengths for the project, which were relied upon in the Air Quality or Greenhouse Gas Emissions Assessments. The speculative analysis identified in the comments above do not change the conclusions of the analysis of the estimated vehicle emissions based on either trip rate or trip length thus there is no substantial evidence that indicates the Air Quality or Greenhouse Gas Emissions Assessments underestimate the magnitude and severity of the potential emissions. The above comments are based on speculation and do not use assumptions or methodology recommended by the SCAQMD, Institute of Transportation Engineers (ITE), or any other agency. While commenter cites to a few studies, the comment applies those studies in an inaccurate manner based on speculation, as explained in the above responses. Under CEQA Guidelines Section 15384, argument, speculation, unsubstantiated opinion or narrative does not constitute substantial evidence. (*Pala Band of Mission Indians v. County of San* Diego (1998) 68 Cal.App.4th 556, 580.)
I-63f	**V. Alternative Analysis of Emissions** 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.	As discussed above in Responses 3 through 5, the IS/MND modeled the Project using a conservative set of assumptions based on industry standard practices, consistent with guidance from the SCAQMD, ITE, and CalEEMod. Even the studies cited by commenter support that the IS/MND's analysis is conservative. In addition to the assumptions discussed in Responses 3 through 5, commenter's revised analysis is also based on assumptions of the percent

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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.[25] 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.[26] 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 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

of employee trips and delivery trips. Commenter's assertion of the percentages are not based on any substantial evidence or factual bases. As noted above, the emissions modeling in the IS/MND are based on CalEEMod data that are derived from sources that include but are not limited to the USEPA AP-42 emission factors, CARB vehicle emission models, ITE data, as well as studies commissioned by California agencies such as the California Energy Commission (CEC) and CalRecycle. The model data is also a result of collaboration of input provided by the California Air Districts to account for local requirements and conditions. CalEEMod utilizes widely accepted methodologies for estimating emissions combined with default data that should be used when site-specific information is not available. Changes to default data must be supported by substantial evidence. The CalEEMod inputs for the Project were modified using available Project specific information to ensure that the emissions inventory reasonably represents the Project including, land use subtypes and quantities, mobile trip rates, fleet mix assumptions.

The modeling and analysis presented in the comment attempts to inflate mobile source emissions by inappropriately modifying trip length and trip type (including percent employee and percent delivery) assumptions. As discussed above, the trip lengths suggested by the commenter are unsubstantiated and not based on any recognized methodology. The trip type assumptions in the modeling provided in the comment are also manipulated to result in greater emissions, but the changes are baseless. As noted above, the trip lengths and trip type data used in the IS/MND are based on actual research and ITE survey data. The analysis provided in the comment is based purely on speculation and does not represent a real-world scenario. Under CEQA Guidelines Section 15384, argument, speculation, unsubstantiated opinion or narrative does not constitute

[25] I was able to reproduce exacdy the output for operational activities appearing in the Appendices of the two *A55e55ment5.* I was not able to reproduce many of the results presented in the text of the *A55e55ment5* because, as noted above, many of the results reported in the text tables caine 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 *A55e55ment5,* I am confident that the only cause of the difference between what I report here and what is reported in the *A55e55ment5* are the difference noted in the Table 1.

[26]

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	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.[27]	substantial evidence. (Pala Band of Mission Indians v. County of San Diego (1998) 68 Cal.App.4th 556, 580.) Thus, the modeling conducted by the commenter shown in Tables 2 and 3 inappropriately uses speculation not substantiated in any professional or industry methodology, which do not constitute substantial evidence, to arrive at inaccurate assumptions and parameters. The commenter's modeling misrepresents the project by vastly overstating the project's trip generation rates, trip lengths, and percent of employee/delivery trips to arrive at exaggerated emissions results. The commenter's analysis does not adequately characterize potential Project impacts, and any conclusions made based on these results are flawed and inferior to the Project specific modeling prepared in the IS/MND. In summary, the commenter uses inaccurate and overstated modeling to attempt inflate emissions. Additionally, while the IS/MND did not identify a significant GHG impact, the project has committed to further reducing GHG emissions through a number of new measures, including installation of solar panels on the building roof, EV chargers for 30 parking spaces, and EV-ready infrastructure for all trucks, all vans, and 50% of car parking spaces, among other measures. As a result of this new solar commitment, the project building is projected to have **net-zero electricity consumption**. These additional sustainability commitments are described in the Supplemental GHG Analysis, included as Appendix 2. As calculated therein, the project's GHG emissions would continue to be below the significance threshold identified in the MND of 10,000 MT CO2e per year, and would also now be below 3,000 metric tons of CO2e per year even if that threshold were applicable. This supplemental GHG analysis, including these additional sustainability commitments, was also peer reviewed and confirmed by Ramboll, as noted in their memo included as Attachment 1.

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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).

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 *A*ir Qualify *Assessmen*1 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,) exceeds SCAQMD thresholds in both the summer

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	and winter. For instance, in the summer, Net Increase in emissions for NO, is 145.16 whereas the SCAQMD threshold is 55.00. Net Increase in winter emissions of NO is 152.38 whereas the SCAQMD threshold is, again, 55.00. In both cases, emissions of NO Tare 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** Greenhouse 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.	

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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.

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.

I-63g	**VI. The Elephant In The Room...Or Parking Lot: 1,104 Van Parking Spaces**	The Commenter incorrectly speculates that the number of parking spaces indicates a future desire to expand the project. Van parking spaces are not

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	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 n*ow 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.	an indicator of actual trip generation. Rather, the trip generation rate is appropriately based on building square footage because building square footage represents the total amount of goods/delivery capacity of a building. The number of van deliveries is capped by the size, i.e. capacity, of the building to store goods for delivery. This is why the ITE trip generation rate is based on building square footage, and not van parking spaces. Further, in this case, total van deliveries (and, thus, trip generation) is limited due to the daily truck delivery cap. Van deliveries cannot increase without a larger building capacity to store goods, or an increase in the truck trip cap. Nevertheless, the number of van parking spaces can be an indicator of factors unrelated to actual van delivery needs, such as lease terms between developer and tenant. For instance, since a tenant frequently pays a developer based on total land area developed, additional developed area (including parking spaces) may be a function of lease price rather than parking demand. Finally, no expansion of the building's operations would be permitted without new environmental analysis under CEQA, public review and public hearings. Any tenant that operates the proposed building will be required to abide by all mitigation measures, conditions of approval, and commitments made in the Development Agreement adopted for this Project, and be consistent with the environmental analysis contained in the IS/MND. All uses and operations must be consistent with the use and operation analyzed in the IS/MND. Therefore, no change or expansion of uses would be permitted without future CEQA review and public hearings which would assess any change or expansion and impose additional mitigations and conditions at that time.
I-63h	**VII. Conclusion**	As discussed in the responses above, the IS/MND modeled the Project using a conservative set of assumptions based on industry standard

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	The *Air* Qualify *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. 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,) 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. **VIII.** [Please see Comment Letter I-63 for tables and attachments referenced in this comment.]	practices, consistent with guidance from the SCAQMD. The modeling conducted by the commenter inappropriately uses speculation not substantiated in any professional or industry methodology to arrive at inaccurate assumptions and parameters. This does not constitute substantial evidence. The IS/MND accurately shows that all impacts can be reduced to a less than significant impact and an IS/MND is the appropriate review document under CEQA and an EIR is not required.
Letter from M. and A. Johnson, dated January 16, 2020		
I-64	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. 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.	The Project site is located in the Commercial/Industrial Mixed-Use (C/I-MU) zone of the City, and the proposed warehouse therefore is a permitted use for the property. The Project is also consistent with the land uses surrounding the property, which includes Cable Airport and a rock quarry to the north, commercial uses to the south and east, and industrial uses to the west. There are already existing warehouses and industrial uses in the City of Upland, in designated and zoned areas where those uses are appropriate distances from homes, therefore this Project would not be the first of this type of use in the City. Detailed technical studies analyzing the potential environmental impacts of the proposed Project determined that all impacts would be less than significant either before or after mitigation, therefore an IS/MND is the appropriate environmental document consistent with CEQA, and an EIR is not warranted. Nonetheless, all of the technical studies included in the project's IS/MND are the exact same technical studies that would have

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		been included in an EIR. Each study's level of detail and thorough, comprehensive analysis is the same between this project's IS/MND and an EIR. The only technical analysis that would have been in an EIR, that is not in an IS/MND, is an evaluation of alternative projects on the site. Therefore there is no project-specific analysis that is missing from this IS/MND which would have been included in an EIR for the project.
Letter from A. Diaz, dated January 19, 2020		
I-65	I AM OPPOSED TO THE BRIDGE PROJECT 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.	The Project site is located in the Commercial/Industrial Mixed-Use (C/I-MU) zone of the City, and the proposed warehouse therefore is a permitted use for the property. The Project is also consistent with the land uses surrounding the property, which includes Cable Airport and a rock quarry to the north, commercial uses to the south and east, and industrial uses to the west. There are no residential uses in close proximity to the project site. There are already existing warehouses and industrial uses in the City of Upland, in designated and zoned areas where those uses are appropriate distances from homes, therefore this Project would not be the first of this type of use in the City. Detailed technical studies analyzing the potential environmental impacts of the proposed Project determined that all impacts would be less than significant either before or after mitigation, therefore an IS/MND is the appropriate environmental document consistent with CEQA, and an EIR is not warranted. Nonetheless, all of the technical studies included in the project's IS/MND are the exact same technical studies that would have been included in an EIR. Each study's level of detail and thorough, comprehensive analysis is the same between this project's IS/MND and an EIR. The only technical analysis that would have been in an EIR, that is not in an IS/MND, is an evaluation of alternative projects on the site. Therefore there is no project-specific analysis that is missing from this IS/MND which would have been included in an EIR for the project.
Letter from B. Sarathy, dated January 17, 2020		

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I-66	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. **Summary of Comments** 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	Detailed technical studies analyzing the potential environmental impacts of the proposed Project determined that all impacts would be less than significant either before or after mitigation, therefore an IS/MND is the appropriate environmental document consistent with CEQA, and an EIR is not required. Nonetheless, all of the technical studies included in the Project's IS/MND are the exact same technical studies that would have been included in an EIR. Each study's level of detail and thorough, comprehensive analysis is the same between this Project's IS/MND and an EIR. The only technical analysis that would have been in an EIR, that is not in an IS/MND, is an evaluation of alternatives to the Project. Therefore, there is no project-specific analysis that is missing from this IS/MND which would have been included in an EIR for the Project. The Project is a warehouse facility consistent with Section 17.51.010 of the City's Municipal Code which Code defines warehousing as the provision of facilities used primarily for the storage of commercial goods, including documents. The Project is located within the C/I-MU zone, and Section 17.05.020 of the City's Municipal Code identifies warehousing as a permitted use within the C/I-MU zone. The General Plan is consistent with the Municipal Code and identifies that warehousing is an allowable use within the C/I-MU zone. The project is also consistent the General Plan's description of the C/I-MU zone as follows: "The Commercial/Industrial Mixed-Use designation is **designed to accommodate a variety of industrial** and regional retail uses and to support commercial activities to satisfy a range of shopping needs for residents of the community. **It is also intended to encourage development of business in the City and to maximize the potential for job generation.** Uses supported under this category include commercial and industrial. **Typical industrial uses could include limited general industrial, manufacturing, assembly, warehousing, multi-tenant industrial, research and development, and airport–related uses**. Typical commercial uses include retail commercial and durable sales goods, tourist-related commercial, entertainment, recreational uses, administrative and professional offices, commercial activities, business support services, food

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	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	and institutional uses, as well as residential, subject to a reasonable minimum increment of land area as well as a special use permit process." (emphasis added) The project is also consistent with the following General Plan policy of the City: "Policy LU-3.2 Economic Revitalization. Promote the development of vacant and underutilized parcels with higher intensity commercial and industrial land uses." The project does not in any way fit the definition of a truck terminal, and is correctly categorized as a warehouse. The US government defines types of businesses by Standard Industrial Classification (SIC). The proposed project fits squarely within Industry Group 422 (Public Warehousing and Storage) and Industry Group SIC Code 4225 – General Warehousing and Storage. The project does not fit within the SIC Industry Group 423 (Terminal and Joint Terminal Maintenance) or Industry Group 421, both of which include terminals operated by motor freight transportation companies. In addition, the ULI publication "Guide to Classifying Industrial Property" available online here: http://courses.washington.edu/cee320ag/warehousing/WarehouseClassification.pdf describes truck terminals as follows: "***Truck Terminals do not warehouse goods. Their sole function is to transfer goods from one truck to another***. Because of this function Truck Terminals are long and narrow in design. Because Truck Terminals transfer rather than store cargo, the facilities also have low ceiling heights. ***Most ceiling heights range from 12 to 16 feet, which is below the height of any facilities within the Warehouse Distribution category***." (emphasis added) The proposed project does not fit this definition of a truck terminal. The proposed project's warehouse will be used to store and then distribute goods directly to customers on vans. No goods will be transferred from one truck to another truck at the project's warehouse, for deliver to the next warehouse in the supply chain, as is the case for a truck terminal.

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	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:	Further, the proposed project's ceiling height is 36 feet, well above the 12 to 16 foot range that is typical for a truck terminal. The project's 36 foot ceiling height is very typical of warehouses that are required to store goods on site in order to optimize storage capacity. The low, 12-16 foot ceiling height works for truck terminals because goods are immediately transferred from one truck to another, without storage. Therefore, the proposed project's warehouse fits neither the operational nor the physical characteristics of a truck terminal. Additionally, the proposed Project will be adding 1,000 new trees and nearly 11 acres of landscaping on the property, but the project will also be paying for and installing new landscaping, curbs, gutters and sidewalks over approximately 1,000 linear feet of Foothill Boulevard as detailed in the Development Agreement. These improvements will enhance the aesthetics and attractiveness of the street, and make the currently vacant lots on Foothill more attractive to development, including retail. The project could serve as an economic catalyst for the Foothill Blvd corridor that will have long-lasting tax revenue benefits for the City. The Traffic Impact Assessment (TIA) prepared for the Project (Appendix H-1) and accounted for the trucks, vans, and passenger cars anticipated to utilize the Project. As analyzed in the IS/MND, a total of 25 trucks per day (total of 50 truck trips) would access the project site, primarily overnight. Of these 25 trucks, 5 would access the Project during daytime hours, resulting in a reduction from current conditions. Vehicle Miles Traveled (VMT) is not currently the City's nor the County's adopted methodology for measuring transportation impacts, and as a result, there are a number of issues with attempting to use VMT to analyze the proposed project. At this time, neither the City nor SBCTA has an adopted methodology, thresholds, or procedures to analyze VMT in the area. Second, VMT only measures passenger vehicles miles of travel, not truck trips or truck VMT. Section 15064.3, subdivision (a), states, *"For the purposes of this section, 'vehicle miles traveled' refers to the amount and distance of automobile travel attributable to a project."* (underline added) Therefore, in the case of the proposed project, VMT would not account for the distances traveled by the trucks or van trips related to the project.

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	"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 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."*	Finally, VMT is intended to measure the impact of a project on a regional or subregional area and therefore it is not a useful metric for analyzing the amount of traffic or congestion that would be experienced in the local community due to a new project, as explained below. The state has imposed the future requirement for a VMT analysis on all local cities as of July 1, 2020, regardless of whether local cities would prefer a VMT or the current LOS methodology used. VMT only measures the total distance traveled by an automobile trips generated by the project, with the goal of reducing the average distances traveled. It is useful tool to evaluate regional land use planning – such as jobs housing balance, access to transit, etc., which affect personal travel patterns to work, shopping, or personal activities. On the other hand, the current metric of LOS (level of service) measures the delay caused by vehicles waiting in traffic at intersections, and therefore measures the actual traffic congestion experienced by drivers before and after the opening of a project. As an example of LOS, under Year 2020 conditions the intersection of Central Avenue/Foothill Boulevard has an average delay (per vehicle) of approximately 32.9 seconds during the evening peak hour and therefore, operates at LOS C. After the addition of project traffic, this delay measurement increases to 33.4 seconds of delay which means that the intersection would still operate at LOS C. The City of Upland has set LOS D as the acceptable standard for operating conditions at this intersection and therefore the addition of project traffic would not exceed the City standard and no significant impact would result from the addition of project traffic. Similar conclusions are drawn from the analysis of Year 2040 conditions. LOS is also a better tool for cities to evaluate what roadway (or transit) infrastructure is needed to reduce traffic congestion, and leads to mitigation like physical street improvements. In contrast, VMT does not provide for mitigation such as street improvements, and actually discourages improvements such as street widening or new turn lanes. Under the VMT approach, such street improvements would incentivize more people to drive and use public streets. Therefore, a VMT analysis would not lead to physical street improvements to the City's roadways,

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	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 impacts. Specifically, rather than total daily trips (2,583 passenger car equivalent trips), why were total Vehicle Miles Traveled also not considered?	and in fact would discourage implementation of such improvements. In sum, LOS is the current required methodology for analyzing traffic impacts in the City of Upland and the SBCTA Congestion Management Program (CMP), not VMT; there is not an CMP or Upland-adopted methodology or threshold for analyzing VMT and therefore the traffic analysis for the project was prepared according to the current City requirements. The commenters asking for VMT analyses should realize that VMT dos not measure actual traffic congestion levels and thus will not result in the type of mitigation that will improve vehicle circulation and reduce congestion. While new trips would be created, all of the project's trips – including employee cars, vans, and trucks – would still create less than a third of the traffic generated by retail store(s) the same size as the proposed project. Therefore the proposed project, even including all the project vans, is a much lower traffic generator than other uses permitted by the zoning for this property. Neither the City's Municipal Code or the CEQA Guidelines require noise measurements to be taken inside residences. Additionally, it is outside of the scope of CEQA and not standard practice to measure noise levels inside of residences. The analysis in the IS/MND shows that the Project would not result in a perceivable increase in traffic noise levels. Therefore, the interior noise increases (if any) would also not be noticeable or significant. The Commenter inaccurately presents model information and omits other relevant information. As discussed above, when weighted according to the CalEEMod default trip type distribution and methodology the average primary trip length in the analysis is actually 12.6 miles for the warehouse land use. Based on the approach to generate the emission inventory, the types of trips is not applicable, as the delivery vehicle trips are separately entered into CalEEModTM and thus the weighted average trip length is the appropriate consideration of what a delivery vehicle trip length may be. A technical deficiency inherent in calculating mobile source emissions associated with any project is related to the estimation of trip length and vehicle miles traveled (VMT). VMT for a given project is calculated by the

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	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	total number of vehicle trips to and from the project site multiplied by the average trip length. This method of estimating VMT for use in calculating vehicle emissions likely results in the overestimation and double-counting of emissions because, for a last mile facility such as the Project, the land use is likely to divert existing vehicle trips that are already on the circulation system as opposed to generating new trips. In this regard, the Project would, to a large extent, redistribute existing mobile-source emissions rather than generate new and additional mobile source emissions. As such, the estimation of the Project's vehicular-source emissions is likely overstated in that no credit for, or reduction in, emissions is assumed based on diversion of existing trips. The Project proposes a last mile facility that would be the final point of distribution of goods before they arrive on customers' doorsteps. The proposed Project is driven by the need to improve the efficiency of delivery. Research conducted for newly-opened last mile facilities indicates that trip lengths are typically between 6 to 9 miles from the population centers they serve.[1] Current deliveries to the Project area likely occur from the next closest e-commerce facilities in Los Angeles or Chino, resulting in longer trip lengths without the Project. The estimated trip length in the IS/MND likely results in a significant overestimation of the vehicle miles resulting from the Project because it assumes that all trips to and from the Project are "new" within the context of the air basin, rather than redistributed trips in the basin. No credit for, or reduction in, emissions is assumed based on replacement of existing trips. For example, the Project would be delivering packages that, primarily, would already be traveling to people's homes on trucks and vehicles, but from farther distances than this Project's proposed last-mile facility. Therefore, the Project would largely be replacing (and reducing) existing trips, and associated greenhouse gas and air quality emissions. Trip lengths used in the analysis were calculated using CalEEModTM developed for California Air Pollution Officers Association (CAPCOA). This

In CalEEMod, Percent Employee Trips appears as "Non Res C—W Trip (%)" while Percent Delivery Trips appears as "Non Res C—NW Trip (%)."

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	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." Concerns: 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." 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	is a standard and accepted model used by all lead agencies in the preparation of environmental documents and analyses, including the City of Upland. CalEEModTM calculates average trip length based on methodology described in CalEEModTM Appendix A, Section 5.1. Since the trip lengths are based on reasonable information, as presented in the IS/MND, providing some greater unsubstantiated trip length that extends beyond what is evaluated in the IS/MND would be speculative at best. A peer review was conducted of the GHG analysis included in the IS/MND by Ramboll, a leading engineering, design and consultancy company which helped develop the South Coast Air Quality Management District's (SCAQMD) preferred GHG emissions model, CalEEMod®, used to develop the GHG emissions inventory for the Project. This peer review memorandum, included as Attachment 1, confirmed that the IS/MND's GHG analysis was prepared using the most-recent, agency-recommended model consistent with SCAQMD guidance and industry standards for estimating GHG emissions and environmental impacts under CEQA. Ramboll's peer review concluded that the IS/MND correctly determined that the Project's GHG emissions would be less than significant. Ramboll also reviewed the GHG significance thresholds used to assess the Project's GHG emissions. The MND uses a 10,000 metric ton (MT) of carbon dioxide equivalent emissions (CO_2e) per year threshold to assess significance of the Project. The SCAQMD has not adopted a GHG significance threshold that applies to most land use development projects. The 10,000 MT CO_2e per year threshold was adopted to capture 90 percent of total emissions from all new or modified industrial (stationary source) projects.[28] A 3,000 MT CO_2e

[28] I [commener] 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.*

[1] Logistics Management, *Last-Mile Deliveries Tend To Run Closer to 6-to-9 Miles, Says CBRE Research*, July 13, 2017.
Available at: https://www.logisticsmgmt.com/article/last_mile_deliveries_tend_to_run_closer_to_6_to_9_miles_says_cbre_research, accessed January 23, 2019 and CBRE, *What is the Last Mile?*, 2018. Available at: http://www.cbre.us/real-estate-services/real-estate-industries/omnichannel/the-definitive-guide-to-omnichannel-real-estate/retailing/what-is-the-importance-of-the-last-mile, accessed January 23, 2019.

[28] Available at: http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds. Accessed: January, 2020.

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	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*	per year value was proposed as a screening threshold for land use development projects but was never adopted in any form by SCAQMD. In the absence of an adopted threshold, the lead agency has discretion to select a significance threshold. Thus, in this context, many lead agencies have applied the 10,000 MT CO_2e per year as a significance threshold because it was adopted by SCAQMD. Various lead agencies have used different approaches as a GHG significance threshold for warehouse development projects, including relying on the 10,000 MT CO_2e per year significance threshold. Based on Ramboll's assessment of the current state of the GHG CEQA practice, the IS/MND's approach to assess the significance of GHG emissions using 10,000 MT CO_2e per year is consistent with the current common approaches by lead agencies to evaluate a warehouse project's GHG emissions under CEQA. Additionally, while the IS/MND did not identify a significant GHG impact, the project has committed to further reducing GHG emissions through a number of new measures, including installation of solar panels on the building roof, EV chargers for 30 parking spaces, and EV-ready infrastructure for all trucks, all vans, and 50% of car parking spaces, among other measures. As a result of this new solar commitment, the project building is projected to have **net-zero electricity consumption**. These additional sustainability commitments are described in the Supplemental GHG Analysis, included as Attachment 2. As calculated therein, the project's GHG emissions would continue to be below the significance threshold identified in the MND of 10,000 MT CO2e per year, and would also now be below 3,000 metric tons of CO2e per year even if that threshold were applicable. This supplemental GHG analysis, including these additional sustainability commitments, was also peer reviewed and confirmed by Ramboll, as noted in their memo. While the IS/MND did not identify a significant GHG impact, the project has committed to further reducing GHG emissions through a number of new measures, including installation of solar panels on the building roof, EV chargers for 30 parking spaces, and EV-ready infrastructure for all trucks, all vans, and 50% of car parking spaces, and inclusion of 1,000 trees

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	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 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-	out the parking lot and landscaped areas around the Project site, among other measures. These new commitments are documented in the Supplemental GHG Report included as Attachment 2, and will be enforced through PDF-GHG-1 through PDF-GHG-5. A landscape plan identifying all of the native plants and 1,000 trees to be planted on site was provided with the project applications and has been added to the Final IS/MND as Attachment 7. As a result of this new solar commitment, the project building is projected to have **net-zero electricity consumption**. Regarding noise, it is outside of the scope of CEQA and not standard practice to measure noise levels inside of residences. The analysis in the IS/MND shows that the Project would not result in a perceivable increase in traffic noise levels. Therefore, the interior noise increases (if any) would also not be noticeable or significant. The comment also suggests vegetative buffers for localized air quality and noise. The analysis in the IS/MND demonstrated that localized emissions would be less than significant and no mitigation would be required. CEQA Guidelines Section 15041(a) requires mitigation to substantially lessen or avoid significant effects on the environment consistent with applicable constitutional requirements such as the "nexus" and "rough proportionality" standards established by case law. Therefore, mitigation would not be required. Furthermore, in response to comments, a mobile-source HRA has been prepared and is included in Attachment 3. As analyzed therein, the HRA shows that the highest calculated risk resulting from the Project is 1.92 per million residents, which is far below the SCAQMD significance threshold of 10 per million residents. Additionally, as discussed in the IS/MND, the Project would not result in any noise impacts. Although the comment recommends additional mitigation measures, mitigation measures are only required to avoid potentially significant impacts per State CEQA Guidelines Sections 15041, 15071, and 15126.4(a)(3). Specifically, CEQA Guidelines Section 15041(a) requires mitigation to substantially lessen or avoid significant effects on the environment consistent with applicable constitutional requirements such as the "nexus" and "rough proportionality" standards established by case law. Therefore, the lead agency has no ability or obligation to impose

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	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	mitigation measures on the Project. Additionally, numerous studies have been conducted on the effectiveness of vegetative noise buffers. The Caltrans study entitled, Traffic Noise Attenuation as a Function of Ground and Vegetation (Final Report, 1995), found that based on detailed measurements and analysis, vegetative barriers are not an effective highway noise mitigation measure to be used on a routine basis. Additionally, Virginia Department of Transportation study, Highway Noise Reduction Experiment (December 2008) summarized the results of various studies that evaluated the effectiveness of vegetative barriers and noted that the vegetative buffers would need to be approximately 33 to 100 feet wide in order to achieve a 3 to 5 dB reduction. As noted in the IS/MND, a 3 dB change is barely perceptible.

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	during operation. The primary source of air pollution for warehouse projects during operation is trucks, which are mobile sources. 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	

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	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 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	

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	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. (See Table in Comment Letter 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	

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	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.	
Letter from S. Mosca, dated January 21, 2020		
I-67	I OPPOSE the proposed development of an e-commerce sorting and distribution center on Foothill Blvd for the following reasons: • Added truck traffic • Health risk due to vehicle emissions • Decrease in property value	The Applicant has agreed to enforceable Conditions of Approval that would limit the Project trucks to a maximum of 5 during the daytime, and 25 in total per day. For reference, the existing rock and gravel processing operations generate dozens of trucks per day to off-haul materials processed onsite. A detailed traffic analysis was included in the IS/MND that included all project-related traffic. Even with all of the project-related vehicles, including trucks, vans and employee vehicles, during the peak hours (i.e. when the greatest number of cars are on the road in both the morning and afternoon), the project will add less than 1% to the existing traffic on Baseline, approximately 2% to the existing traffic on Benson, and less than 5% to Foothill. All of the project's trips would create less than a third of the traffic generated by retail store(s) the same size as the proposed project, and would generate far less truck traffic. Therefore the proposed project, even including all the project vans, is a much lower traffic generator than other uses permitted by the zoning for this property. Additionally, the traffic study also overestimates the trips created by the project, as it is based on a 276,000 square foot building, and the building was downsized further to only 201,000 square feet since preparation of the traffic study.

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		That's a nearly 28% reduction compared to the building analyzed in the traffic study, therefore the trip generation will likely be even less than what's presented in the traffic study. The South Coast Air Quality Management District (SCAQMD) requires Health Risk Assessments (HRAs) for projects that are within 1,000 feet of sensitive receptors and have more than 100 trucks per day. As analyzed in the IS/MND, the Project would have 25 trucks per day, and remains under the 100 truck per day threshold noted above. Further, the truck court on the Project site would be approximately 2,000 feet (i.e., more than 1,000 feet) from the closest sensitive receptors. Therefore, impacts would be less than significant and an HRA is not required. Nonetheless, in response to comments, a mobile-source HRA has been prepared and is included in Attachment 3. As analyzed therein, the HRA shows that the highest calculated risk resulting from the Project is 1.92 per million residents, which is far below the South Coast Air Quality Management District's (SCAQMD) adopted significance threshold of 10 per million residents. This is because 98 percent of the Project's vehicle trips would be automobiles or vans and not heavy-duty diesel trucks, which are the primary generators of the diesel particulate matter analyzed in HRAs. The SCAQMD's significance threshold is health-protective of residents and other sensitive uses and is the adopted threshold used by lead agencies for HRAs. Impacts to property values are not a part of the environmental analysis under CEQA. Section 15131(a) of the CEQA Guidelines states that economic or social effects of a project shall not be treated as significant effects on the environment and that the focus of the analysis shall be on the physical changes taking place. The IS/MND thoroughly analyzed all environmental areas required by the California Environmental Quality Act (CEQA) Guidelines.
Letter from C. Contreras, dated January 20, 2020		
I-68	Thank you for the opportunity to review and comment on the Initial Study. These comments reflect my experience and expertise as a subject matter	The South Coast Air Quality Management District (SCAQMD) requires Health Risk Assessments (HRAs) for projects that are within 1,000 feet of

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	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. Please refer to the attached document for detailed comments. [Attached letter:] 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	sensitive receptors and have more than 100 trucks per day. As analyzed in the IS/MND, the Project would have 25 trucks per day, which and remains under the 100 truck per day threshold noted above. Further, the truck court on the Project site would be approximately 2,000 feet (i.e., more than 1,000 feet) from the closest sensitive receptors. Therefore, impacts would be less than significant and an HRA is not required. Nonetheless, in response to comments, a mobile-source HRA has been prepared and is included in Attachment 3. As analyzed therein, the HRA shows that the highest calculated risk resulting from the Project is 1.92 per million residents, which is far below the South Coast Air Quality Management District's (SCAQMD) adopted significance threshold of 10 per million residents. This is because 98 percent of the Project's vehicle trips would be automobiles or vans and not heavy-duty diesel trucks, which are the primary generators of the diesel particulate matter analyzed in HRAs. The SCAQMD's significance threshold is health-protective of residents and other sensitive uses and is the adopted threshold used by lead agencies for HRAs. An HRA is not warranted for construction emissions. The Project site is more than 1,000 feet from any sensitive receptors. A 1,000-foot buffer is widely accepted as the screening distance before triggering the need for an HRA. The 1,000-foot radius is consistent with findings in CARB's *Air Quality and Land Use Handbook* (2005) and the California Health & Safety Code §42301.6 (Notice for Possible Source Near School). The CARB *Air Quality and Land Use Handbook* found that TAC concentrations are reduced substantially at a distance 1,000 feet downwind from sources such as freeways or large distribution centers. Furthermore, the SCAQMD analyzes the health effects of Toxic Air Contaminants (TACs) based on continuous exposure over lifetime (e.g., 30 or 70 years). The use of diesel-powered construction equipment would be temporary and episodic. The duration of exposure would be short and exhaust from construction equipment dissipates rapidly. Current models and methodologies for conducting health risk assessments are associated with longer-term exposure periods of 30 and 70 years, which do not correlate well with the temporary and highly variable nature of

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	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. • 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	construction activities. Given the short-term construction schedule of approximately 24 months, the Project would not result in a long-term (30 or 70 year) source of TAC emissions. No substantial sources of residual emissions and corresponding individual cancer risk are anticipated after construction. Therefore, further evaluation of construction TAC emissions is not warranted. Additionally, PDF-AQ-1 requires off-road diesel-powered construction equipment greater than 50 horsepower shall meet USEPA Tier 4 off-road emission standards. Meeting Tier 4 off-road emissions standards also reduces the diesel exhaust, which minimizes TAC emissions. Detailed technical studies analyzing the potential environmental impacts of the proposed Project determined that all impacts would be less than significant either before or after mitigation, therefore an IS/MND is the appropriate environmental document consistent with CEQA, and an EIR is not warranted. Nonetheless, all of the technical studies included in the project's IS/MND are the exact same technical studies that would have been included in an EIR. Each study's level of detail and thorough, comprehensive analysis is the same between this project's IS/MND and an EIR. The only technical analysis that would have been in an EIR, that is not in an IS/MND, is an evaluation of alternative projects on the site. Therefore there is no project-specific analysis that is missing from this IS/MND which would have been included in an EIR for the project. The IS/MND's noise study did analyze both mobile noise from cars, vans and trucks, and noise from on-site operations. As discussed in the IS/MND, the Federal Highway Administration Highway Traffic Noise Prediction Model (FHWA RD-77-108) was used to predict the impact of Project generated traffic noise and compare Project traffic noise to existing roadway noise. The model is based upon the California vehicle noise (CALVENO) reference noise factors for automobiles, medium trucks, and heavy trucks, with consideration given to vehicle volume, speed, roadway configuration, distance to the receiver, and the acoustical characteristics of the site. For the "with project" scenarios that were evaluated, the analysis adjusted the fleet mix to account for any changes to truck percentages that would be attributable to the Project. As a conservative

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	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. • The Project proposes the use of a fleet that will increase the number of vehicles traveling throughout the City of Upland. The Project proposes	measure, the analysis did not take credit for the existing trucks associated with the rock crushing activity that would no longer operate on the site. The analysis shows that even with the Project-related truck noise (including accelerating and braking), the Project would not result in a perceivable increase in traffic noise levels. As shown in Table 10 and Table 11 of the Acoustical Assessment, the greatest increase in noise between with and without Project conditions would occur on Central Avenue between Foothill Blvd and 11th Street. At this location, traffic noise would increase by 0.7 dBA which is below the human ear's ability to perceive. Therefore, as stated in the Acoustical Assessment, traffic noise impacts would be less than significant. It should be noted that the Project would generate daily 50 truck trips, which is less than the dozens of truck trips currently occurring from the rock crushing operations. The noise analysis conservatively did not take credit for the existing trucks on the site that would no longer occur if the Project was operational. The noise analysis is based on noise prediction modeling and empirical observations. Construction noise levels were based on typical noise levels generated by construction equipment published by the Federal Transit Administration. The traffic noise levels on the Project vicinity roadways were calculated using the FHWA Highway Noise Prediction Model (FHWA-RD- 77-108). Groundborne vibration levels associated with construction-related activities for the Project were evaluated utilizing typical groundborne vibration levels associated with construction equipment, obtained from Federal Transit Administration published data for construction equipment. Potential groundborne vibration impacts related to structural damage and human annoyance were evaluated, considering the distance from construction activities to nearby land uses and typically applied criteria for structural damage and human annoyance. Peak hour trips (total in and out) was determined to add less than 5% of trips (including all employee and visitor truck, van and passenger cars) on Foothill Boulevard, approximately 2% on Benson Avenue, and less than 1% on Baseline Road. As discussed in the IS/MND, the noise analysis found roadway noise levels

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	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: o Reduce locally generated pollutant emissions (Goal OSC-4) o Encourage alternative modes of transportation that reduce greenhouse gas emissions (Policy LU-4.4) o Reduce the number and length of motor vehicle trips (Policy OSC-4.1) o 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.	were evaluated in the noise analysis and were determined to range from 66.5 dBA to 71.0 dBA under "2040 Without Project" conditions and from 66.9 dBA to 71.1 dBA under "2040 Plus Project" conditions. The traffic noise analysis used a 24-hour noise metric that accounts for noise sensitivity during evening and nighttime hours. The highest noise levels would occur along Central Avenue. Central Avenue is expected experience an increase in ambient noise levels of up to 0.7 dBA from Foothill Boulevard to 11th Street. This level is below the perceptible noise level change of 3.0 dBA, and the resulting noise level is 67.2 dBA, which is below the City's 75 dBA standard for industrial uses and 70 dBA standard for commercial uses along this roadway segment. The remainder of the Project-related traffic noise increases would be below 3.0 dBA, which is not perceptible. Therefore, no significant impacts would occur. The IS/MND's noise study and air quality analysis was based on noise and emissions from all project-related vehicles, including cars, vans and trucks. The Project would not generate a perceivable traffic noise increase from mobile sources or from on-site operations, and all air quality impacts would be less than significant accounting for all project-related trips. Detailed technical studies analyzing the potential environmental impacts of the proposed Project determined that all impacts would be less than significant either before or after mitigation, therefore an IS/MND is the appropriate environmental document consistent with CEQA, and an EIR is not required. Nonetheless, all of the technical studies included in the Project's IS/MND, including the air quality and noise studies, are the exact same technical studies that would have been included in an EIR. Each study's level of detail and thorough, comprehensive analysis is the same between this Project's IS/MND and an EIR. The only technical analysis that would have been in an EIR, that is not in an IS/MND, is an evaluation of alternatives to the Project. Therefore, there is no project-specific analysis that is missing from this IS/MND which would have been included in an EIR for the Project. The IS/MND thoroughly analyzed all thresholds required by the CEQA Guidelines and determined that the Project would result in no significant impacts after mitigation; impacts to air quality and traffic, including

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		pedestrian safety, would be mitigated to a less than significant level. While new trips would be created, all of the Project's trips – including employee cars, vans, and trucks – would still create less than a third of the traffic generated by retail store(s) the same size as the proposed Project, and would generate far less truck traffic. Therefore, the proposed Project, even including all the Project vans, is a much lower traffic generator than other uses permitted by the zoning for this property. Moreover, the existing rock and gravel processing operations generate dozens of trucks per day to off-haul materials processed onsite as compared to the proposed project's 25 trucks per day. The traffic study prepared for the Project (Appendix H-1) and accounted for the trucks, vans, and passenger cars anticipated to utilize the Project. As analyzed in the IS/MND, a total of 25 trucks per day (total of 50 truck trips) would access the project site, primarily overnight. Of these 25 trucks, 5 would access the Project during daytime hours, resulting in a reduction from current conditions. As the commenter notes, while new trips would be created, all of the project's trips – including employee cars, vans, and trucks – would still create less than a third of the traffic generated by retail store(s) the same size as the proposed project. Therefore, the proposed project, even including all the project vans, is a much lower traffic generator than other uses permitted by the zoning for this property. Further, the IS/MND likely results in a significant overestimation of the vehicle miles, as well as the air quality and GHG emissions, resulting from the Project because it assumes that all trips to and from the Project are "new" within the context of the air basin, rather than redistributed trips in the basin. No credit for, or reduction in, emissions is assumed based on replacement of existing trips. For example, the Project would be delivering packages that, primarily, would already be traveling to people's homes on trucks and vehicles, but from farther distances than this Project's proposed last-mile facility. Therefore, the Project would largely be replacing (and reducing) existing trips, and associated greenhouse gas and air quality emissions. Additionally, as noted in the Supplemental GHG Analysis prepared for the proposed Project, the Project would include design features (PDF-GHG-1, PDF-GHG-2, PDF-GHG-3, PDF-GHG-4, and PDF-GHG-

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		5) that would include: the installation of 0.75 MW of rooftop solar; provide electric vehicle (EV) charging stations for 30 parking spaces; provide EV-ready parking spaces for 50% of auto stalls (including 100% of ADA stalls) 100% of van parking stalls, 100% of trailer parking stalls, 100% of dock doors, and 100% of van positions at van loading areas at both the northern and southern sides of the building; include 1,000 trees throughout the parking lot and landscaped areas around the Project site; and use all electric powered forklifts. Thus, the Project is in compliance with General Plan Goal OSC-4, Policy LU-4.4, Policy OSC-4.1, and Policy OSC-4.4.
Letter from L. Elliott, D. Elliott, Y. Saul, and S. Saul, dated January 17, 2020		
I-69	We vehemently OPPOSE this building in our CITY OF GRACIOUS LIVING. 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	The Project site is located in the Commercial/Industrial Mixed-Use (C/I-MU) zone of the City, and the proposed warehouse therefore is a permitted use for the property. The Project is also consistent with the land uses surrounding the property, which includes Cable Airport and a rock quarry to the north, commercial uses to the south and east, and industrial uses to the west. There are already existing warehouses and industrial uses in the City of Upland, in designated and zoned areas where those uses are appropriate distances from homes, therefore this Project would not be the first of this type of use in the City. The Project is a warehouse facility consistent with Section 17.51.010 of the City’s Municipal Code which Code defines warehousing as the provision of facilities used primarily for the storage of commercial goods, including documents. The Project is located within the C/I-MU zone, and Section 17.05.020 of the City’s Municipal Code identifies warehousing as a permitted use within the C/I-MU zone. The project does not in any way fit the definition of a truck terminal, and is correctly categorized as a warehouse. The US government defines types of businesses by Standard Industrial Classification (SIC). The proposed project fits squarely within Industry Group 422 (Public Warehousing and Storage) and Industry Group SIC Code 4225 – General Warehousing and Storage. The project does not fit within the SIC Industry Group 423 (Terminal and Joint Terminal Maintenance) or

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	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.	Industry Group 421, both of which include terminals operated by motor freight transportation companies. In addition, the ULI publication "Guide to Classifying Industrial Property" available online here: http://courses.washington.edu/cee320ag/warehousing/WarehouseClassification.pdf describes truck terminals as follows: "***Truck Terminals do not warehouse goods. Their sole function is to transfer goods from one truck to another***. Because of this function Truck Terminals are long and narrow in design. Because Truck Terminals transfer rather than store cargo, the facilities also have low ceiling heights. ***Most ceiling heights range from 12 to 16 feet, which is below the height of any facilities within the Warehouse Distribution category***." (emphasis added) The proposed project does not fit this definition of a truck terminal. The proposed project's warehouse will be used to store and then distribute goods directly to customers on vans. No goods will be transferred from one truck to another truck at the project's warehouse, for deliver to the next warehouse in the supply chain, as is the case for a truck terminal. Further, the proposed project's ceiling height is 36 feet, well above the 12 to 16 foot range that is typical for a truck terminal. The project's 36 foot ceiling height is very typical of warehouses that are required to store goods on site in order to optimize storage capacity. The low, 12-16 foot ceiling height works for truck terminals because goods are immediately transferred from one truck to another, without storage. Therefore, the proposed project's warehouse fits neither the operational nor the physical characteristics of a truck terminal. The General Plan is consistent with the Municipal Code and identifies that warehousing is an allowable use within the C/I-MU zone. The project is also consistent the General Plan's description of the C/I-MU zone as follows: "The Commercial/Industrial Mixed-Use designation is **designed to accommodate a variety of industrial** and regional retail uses and to support commercial activities to satisfy a range of shopping needs for

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		residents of the community. **It is also intended to encourage development of business in the City and to maximize the potential for job generation.** Uses supported under this category include commercial and industrial. **Typical industrial uses could include limited general industrial, manufacturing, assembly, warehousing, multi-tenant industrial, research and development, and airport–related uses**. Typical commercial uses include retail commercial and durable sales goods, tourist-related commercial, entertainment, recreational uses, administrative and professional offices, commercial activities, business support services, food and institutional uses, as well as residential, subject to a reasonable minimum increment of land area as well as a special use permit process." (emphasis added) The project is also consistent with the following General Plan policy of the City: "Policy LU-3.2 Economic Revitalization. Promote the development of vacant and underutilized parcels with higher intensity commercial and industrial land uses." The Project has not been pre-approved by the City of Upland, and no tenant has been identified or has been leased for this Project. The scope of the City's Municipal Code does not provide authority for the City to determine or review the choice of tenant that may occupy the building. *Friends of Davis v. City of Davis* (2000) 83 Cal.App.4th 1004, 1013-14. The Project, its entitlements, and the IS/MND will require approval from the City Council in order to proceed. Detailed technical studies analyzing the potential environmental impacts of the proposed Project determined that all impacts would be less than significant either before or after mitigation, therefore an IS/MND is the appropriate environmental document consistent with CEQA, and an EIR is not required. Nonetheless, all of the technical studies included in the Project's IS/MND are the exact same technical studies that would have been included in an EIR. Each study's level of detail and thorough, comprehensive analysis is the same between this Project's IS/MND and an EIR. Under CEQA, the only additional analysis that an EIR requires is an alternatives analysis to consider whether there are any alternatives that would reduce impacts that cannot be mitigated to less than significant.

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		Here, because there are no significant impacts, CEQA does not require an alternatives analysis to try to reduce impacts. While economic impacts are outside the scope of the IS/MND, a Development Agreement is part of the project's entitlements which proposes millions of dollars in contributions for the City, in addition to the City's standard development impact fees. These contributions would go towards road maintenance, police, parks, education, local businesses and other civic improvements.
Letter from C. Amrhein, dated January 6, 2020		
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.	The Project site is located in the Commercial/Industrial Mixed-Use (C/I-MU) zone of the City, and the proposed warehouse therefore is a permitted use for the property. The Project is also consistent with the land uses surrounding the property, which includes Cable Airport and a rock quarry to the north, commercial uses to the south and east, and industrial uses to the west. There are already existing warehouses and industrial uses in the City of Upland, in designated and zoned areas where those uses are appropriate distances from homes, therefore this Project would not be the first of this type of use in the City.
Letter from M. and K. Melvin, dated January 18, 2020		
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	The IS/MND prepared for the Project thoroughly analyzes all thresholds required by the CEQA Guidelines. In accordance with the CEQA Guidelines, the IS/MND evaluated the required environmental analysis of 20 environmental areas. Further, the IS/MND overestimates the Project's environmental impacts as it analyzed a 276,250 sf building; the Project has since been further reduced in size by 75,154 sf, or nearly 28% to the currently proposed 201,096 sf building. The comment incorrectly states that the emissions of nitrogen oxides and carbon dioxides exceed the SCAQMD thresholds. As discussed above, the

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	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!	IS/MND quantified Project emissions based on SCAQMD recommended modeling and methodologies and demonstrated that the Project's increase in emissions would not exceed applicable SCAQMD thresholds. Also refer to Response to Comment I-79. The IS/MND provides a comprehensive and thorough analysis of the environmental impacts of the Project as required by the CEQA Guidelines. Accordingly, the IS/MND includes more than 1,800 pages of environmental analysis, including 10 technical studies and evaluated all required thresholds required by CEQA and City requirements. The IS/MND thoroughly analyzed all thresholds required by the CEQA Guidelines and determined that the Project would result in no significant impacts after mitigation; impacts to air quality and traffic, including pedestrian safety, would be mitigated to a less than significant level. A tenant has not yet been identified for the Project, and the scope of the City's Municipal Code does not provide authority for the City to determine or review the choice of tenant that may occupy the building. Friends of Davis v. City of Davis (2000) 83 Cal.App.4th 1004, 1013-14. While tax revenue to the City is outside the scope of the environmental analysis in the IS/MND, the project's proposed Development Agreement provides for an annual contribution for road maintenance, with the term of the contribution to be determined as part of the public review process. This annual contribution would be just part of the project's multi-million dollar financial commitment to the City included in the proposed Development Agreement, and in addition to the $2.5 million in City fees that the project will also be paying. The annual contribution is intended to replicate what the City could theoretically collect in sales tax from a retail project of similar size—however, at this dollar amount, the project's proposed annual contribution is the equivalent of a top 10 sales tax producer for the City. Additionally, while sales tax is variable (and mostly down over the last decade), and retail is generally declining, this would be guaranteed revenue for the City, and, again, would make the project one of the largest revenue sources for the City. While economic impacts are outside the scope of the IS/MND, a

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		Development Agreement is part of the project's entitlements which proposes millions of dollars in contributions for the City, in addition to the City's standard development impact fees. These contributions would go towards road maintenance, police, parks, education, local businesses and other civic improvements.
Letter from B. McJoynt, dated January 20, 2020		
I-72	I am writing to express my opposition to the proposed development of a distribution center on 50 acres at FoothiII/Benson/Central. I have been following this issue since first presented end 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 thot 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 wiII 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 effect 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. It is my belief that a full EKR is required. 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. (Benson Avenue is an example.)	The Project site is located in the Commercial/Industrial Mixed-Use (C/I-MU) zone of the City, and the proposed warehouse therefore is a permitted use for the property. The Project is also consistent with the land uses surrounding the property, which includes Cable Airport and a rock quarry to the north, commercial uses to the south and east, and industrial uses to the west. There are already existing warehouses and industrial uses in the City of Upland, in designated and zoned areas where those uses are appropriate distances from homes, therefore this Project would not be the first of this type of use in the City. Even with all of the project-related vehicles, including trucks, vans and employee vehicles, during the peak hours (i.e. when the greatest number of cars are on the road in both the morning and afternoon), the project will add less than 1% to the existing traffic on Baseline, approximately 2% to the existing traffic on Benson, and less than 5% to Foothill. All of the project's trips would create less than a third of the traffic generated by retail store(s) the same size as the proposed project, and would generate far less truck traffic. Therefore the proposed project, even including all the project vans, is a much lower traffic generator than other uses permitted by the zoning for this property. Additionally, the traffic study also overestimates the trips created by the project, as it is based on a 276,000 square foot building, and the building was downsized further to only 201,000 square feet since preparation of the traffic study. That's a nearly 28% reduction compared to the building analyzed in the traffic study, therefore the trip generation will likely be even less than what's presented in the traffic study. With regard to road maintenance, in addition to the standard project fees which includes nearly $500,000 for roads (i.e., this is the amount the City

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	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 end increased time needing to be dedicated by our Upland Police Department. To have a large distribution center located on our 'Foothill corridor' wiII 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 w II 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 (of 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! Attached comments from 10/28/2019: 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	collects to pay for new road improvements and maintenance as a result of any new project and it is based on the size and use of the project), the project's Development Agreement includes an annual contribution for road maintenance, with the term of the contribution to be determined as part of the public review process. This annual contribution is intended to replicate what the City could theoretically collect in sales tax from a retail project of similar size—however, at this dollar amount, the project's proposed annual contribution is the equivalent of a top 10 sales tax producer for the City. Additionally, while sales tax is variable (and mostly down over the last decade), and retail is generally declining, this would be guaranteed revenue for the City, and, again, would make the project one of the largest revenue sources for the City. Not only will the Project be adding 1,000 new trees and nearly 11 acres of landscaping on the property, but the Project will also be paying for and installing new landscaping, curbs, gutters and sidewalks over approximately 1,000 linear feet of Foothill Boulevard as detailed in the Development Agreement. These improvements will enhance the aesthetics and attractiveness of the street. The South Coast Air Quality Management District (SCAQMD) requires Health Risk Assessments (HRAs) for projects that are within 1,000 feet of sensitive receptors and have more than 100 trucks per day. As analyzed in the IS/MND, the Project would have 50 truck trips per day (less than 100 trucks) and the truck court on the Project site would be approximately 2,000 feet (i.e., more than 1,000 feet) from the closest sensitive receptors. Therefore, impacts would be less than significant and an HRA is not required. Nonetheless, in response to comments, a mobile-source HRA has been prepared and is included in Attachment 3. As analyzed therein, the HRA shows that the highest calculated risk resulting from the Project is 1.92 per million residents, which is far below the South Coast Air Quality Management District's (SCAQMD) adopted significance threshold of 10 per million residents. This is because 98 percent of the Project's vehicle trips would be automobiles or vans and not heavy-duty diesel trucks, which are the primary generators of the diesel particulate matter analyzed in HRAs.

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	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. 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 ONGOZNG 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 and ½ % 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 soap 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.	The SCAQMD's significance threshold is health-protective of residents and other sensitive uses and is the adopted threshold used by lead agencies for HRAs. While economic impacts are outside the scope of the IS/MND, a Development Agreement is part of the project's entitlements which proposes millions of dollars in contributions for the City, in addition to the City's standard development impact fees. These contributions would go towards road maintenance, police, parks, education, local businesses and other civic improvements.
Letter from B. Smith, dated January 13, 2020		

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I-73	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.	The comment is noted. The comment does not raise any issues or address the adequacy of the IS/MND, and thus no further response is needed.
Letter from Irmalinda Osuna, dated January 21, 2020		
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	While tax revenue to the City is outside the scope of the environmental analysis in the IS/MND, the project's proposed Development Agreement provides for an annual contribution for road maintenance, with the term of the contribution to be determined as part of the public review process. This annual contribution would be just part of the project's multi-million dollar financial commitment to the City included in the proposed Development Agreement, and in addition to the $2.5 million in City fees that the project will also be paying. The annual contribution is intended to replicate what the City could theoretically collect in sales tax from a retail project of similar size—however, at this dollar amount, the project's proposed annual contribution is the equivalent of a top 10 sales tax producer for the City. Additionally, while sales tax is variable (and mostly down over the last decade), and retail is generally declining, this would be guaranteed revenue for the City, and, again, would make the project one of the largest revenue sources for the City. The subsidies are being requested as part of the project. The Traffic Impact Assessment (TIA) prepared for the Project (Appendix H-1) and accounted for the trucks, vans, and passenger cars anticipated to utilize the Project. As analyzed in the IS/MND, a total of 25 trucks per day (total of 50 truck trips) would access the project site, primarily overnight. Of these 25 trucks, 5 would access the Project during daytime hours, resulting in a reduction from current conditions. The IS/MND prepared for the Project thoroughly analyzes all thresholds required by the CEQA Guidelines. In accordance with the CEQA Guidelines, the IS/MND evaluated the required environmental analysis of 20 environmental areas. Further, the IS/MND overestimates the Project's environmental impacts as it analyzed a 276,250 sf building; the Project has

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	occurred many years ago and that we are sadly paying today. (See Figure 1 [in Comment Letter I-74]). 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 [in Comment Letter I-74]), the cost of additional police staff to address the spike in traffic/accidents, the cost of local jobs (see figure 3 [in Comment Letter I-74]), the cost of Burtec e-commerce excess packaging waste (see Attachment B [in Comment Letter I-74]), the cost of increased water usage, the cost of public subsidies *Amazon* is indirectly receiving (see figure 4 [in Comment Letter I-74]) and many other cost that the city may not have factored into the financial analysis. 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 [in Comment Letter I-74])? 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 [in Comment Letter I-74]). 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 [in Comment Letter I-74]). 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	since been further reduced in size by 75,154 sf, or nearly 28% to the currently proposed 201,096 sf building. The IS/MND provides a comprehensive and thorough analysis of the environmental impacts of the Project as required by the CEQA Guidelines. Accordingly, the IS/MND includes more than 1,800 pages of environmental analysis, including 10 technical studies and evaluated all required thresholds required by CEQA and City requirements. Detailed technical studies analyzing the potential environmental impacts of the proposed Project determined that all impacts would be less than significant either before or after mitigation, therefore an IS/MND is the appropriate environmental document consistent with CEQA, and an EIR is not required. Nonetheless, all of the technical studies included in the Project's IS/MND are the exact same technical studies that would have been included in an EIR. Each study's level of detail and thorough, comprehensive analysis is the same between this Project's IS/MND and an EIR. The only technical analysis that would have been in an EIR, that is not in an IS/MND, is an evaluation of alternatives to the Project. Therefore, there is no project-specific analysis that is missing from this IS/MND which would have been included in an EIR for the Project. Per the CEQA Guidelines, the project analyzes 20 resource categories. Economic impacts are not required to be evaluated under the CEQA Guidelines and is therefore out of the scope of the IS/MND analysis. With regard to road maintenance, in addition to the standard project fees which includes nearly $500,000 for roads (i.e., this is the amount the City collects to pay for new road improvements and maintenance as a result of any new project and it is based on the size and use of the project), the project's Development Agreement includes an annual contribution for road maintenance, with the term of the contribution to be determined as part of the public review process. This annual contribution is intended to replicate what the City could theoretically collect in sales tax from a retail project of similar size—however, at this dollar amount, the project's proposed annual contribution is the equivalent of a top 10 sales tax producer for the City. Additionally, while sales tax is variable (and mostly down over the last decade), and retail is generally declining, this would be

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	"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 [in Comment Letter I-74]). 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.	guaranteed revenue for the City, and, again, would make the project one of the largest revenue sources for the City. A tenant has not yet been identified for the Project, and the scope of the City's Municipal Code does not provide authority for the City to determine or review the choice of tenant that may occupy the building. *Friends of Davis v. City of Davis* (2000) 83 Cal.App.4th 1004, 1013-14. While the tenant has not been determined at this time, any future operation on the Project site would be subject to the same mitigation measures, conditions of approval and provisions contained in the Development Agreement as the proposed Project. Any future use on the Project site would be required to comply with the uses approved for the site. Accordingly, however, CEQA Guidelines provide that analysis is based on the operational and construction related environmental impacts of a project and does not consider the owner or prospective tenant in that analysis.
Letter from C. Bunch, dated January 21, 2020		

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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.	With regard to road maintenance, in addition to the standard project fees which includes nearly $500,000 for roads (i.e., this is the amount the City collects to pay for new road improvements and maintenance as a result of any new project and it is based on the size and use of the project), the project's Development Agreement includes an annual contribution for road maintenance, with the term of the contribution to be determined as part of the public review process. This annual contribution is intended to replicate what the City could theoretically collect in sales tax from a retail project of similar size—however, at this dollar amount, the project's proposed annual contribution is the equivalent of a top 10 sales tax producer for the City. Additionally, while sales tax is variable (and mostly down over the last decade), and retail is generally declining, this would be guaranteed revenue for the City, and, again, would make the project one of the largest revenue sources for the City. Additionally, the Applicant has agreed to enforceable Conditions of Approval that would limit the Project trucks to a maximum of 5 during the daytime, and 25 in total per day. While economic impacts are outside the scope of the IS/MND, a Development Agreement is part of the project's entitlements which proposes millions of dollars in contributions for the City, in addition to the City's standard development impact fees. These contributions would go towards road maintenance, police, parks, education, local businesses and other civic improvements. Additionally, Bridge's investment in the property and other off-site improvements could expand the City's tax revenue base in the future. The project will create 300 permanent employees in the building who will want to eat and buy goods and services at neighboring stores. Not only will the project be adding 1,000 new trees and nearly 11 acres of landscaping on the property, but the project will also be paying for and installing new landscaping, curbs, gutters and sidewalks over approximately 1,000 linear feet of Foothill Boulevard as detailed in the Development Agreement. These improvements will enhance the aesthetics and attractiveness of the street and could make the currently vacant lots on Foothill more attractive to development, including retail. The project could serve as an economic

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		catalyst for the Foothill Blvd corridor that will have long-lasting tax revenue benefits for the City.
Letter from Landecena dated January 21, 2020		
I-76	I support the Bridge Development.	Comment in support of the Project is noted.
Letter from B. Rife, dated January 22, 2020		
I-77	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.	The IS/MND prepared for the Project thoroughly analyzes all thresholds required by the CEQA Guidelines. In accordance with the CEQA Guidelines, the IS/MND evaluated the required environmental analysis of 20 environmental areas. Further, the IS/MND overestimates the Project's environmental impacts as it analyzed a 276,250 sf building; the Project has since been further reduced in size by 75,154 sf, or nearly 28% to the currently proposed 201,096 sf building. The IS/MND provides a comprehensive and thorough analysis of the environmental impacts of the Project as required by the CEQA Guidelines. Accordingly, the IS/MND includes more than 1,800 pages of environmental analysis, including 10 technical studies and evaluated all required thresholds required by CEQA and City requirements. While economic impacts are outside the scope of the IS/MND, a Development Agreement is part of the project's entitlements which proposes millions of dollars in contributions for the City, in addition to the City's standard development impact fees. These contributions would go towards road maintenance, police, parks, education, local businesses and other civic improvements. Additionally, Bridge's investment in the property and other off-site improvements could expand the City's tax revenue base in the future. The project will create 300 permanent employees in the building who will want to eat and buy goods and services at neighboring stores. Not only will the project be adding 1,000 new trees and nearly 11 acres of landscaping on the property, but the project will also be paying for and installing new landscaping, curbs, gutters and sidewalks over approximately 1,000 linear

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		feet of Foothill Boulevard as detailed in the Development Agreement. These improvements will enhance the aesthetics and attractiveness of the street and could make the currently vacant lots on Foothill more attractive to development, including retail. The project could serve as an economic catalyst for the Foothill Blvd corridor that will have long-lasting tax revenue benefits for the City.
Letter from C. Alanis dated January 21, 2020		
I-78	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.	Comment in support of the Project is noted.
Letter from A. Smith, dated January 21, 2020		
I-79a	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. 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.	The IS/MND thoroughly analyzed all environmental impacts required by the CEQA Guidelines according to objective thresholds and criteria, and determined that the Project would result in no significant impacts after mitigation. Detailed technical studies analyzing the potential environmental impacts of the proposed Project determined that all impacts would be less than significant either before or after mitigation, therefore an IS/MND is the appropriate environmental document consistent with CEQA, and an EIR is not warranted. Under CEQA Guidelines Section 15384, argument, speculation, unsubstantiated opinion or narrative, evidence that is not credible, and evidence of social and economic impacts does not constitute substantial evidence. (*Pala Band of Mission Indians v. County of San Diego* (1998) 68 Cal.App.4th 556, 580.) While it is acknowledged that the commenter accurately states what the fair argument standard constitutes, here, neither this nor any other comment presents substantial evidence of a fair argument that the project may cause a significant impact. Protect Niles v City of Fremont (2018) 25 CA5th 1129; Jensen v City of Santa Rosa (2018) 23 CA5th 877, 897. In the absence substantial evidence provided in comments, an IS/MND is the proper means to evaluate a project under

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	General Comments - Mitigated Negative Declaration The proposed MND is legally inadequate and an Environmental Impact Report ("BIR") 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 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)(l).) 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.)	CEQA. *Rominger v County of Colusa* (2014) 229 CA4th 690.
I-79b	**Potentially Significant Environmental Impacts Warranting An EIR** Air Quality Impacts 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	Emissions from the existing rock and gravel processing operations were calculated in CalEEMod based on information provided by Upland Rock, Inc. (the existing on-site operator). The operational information provided by Upland Rock, Inc., which has also been provided to the lead agency, included the type, horsepower, and hours of operation for off-road equipment used for rock and gravel processing activities. The equipment types, horsepower, and use duration (hours per day) of existing equipment currently being utilized at the project site are provided in the CalEEMod outputs in Appendix A and Appendix B of the IS/MND.

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	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[29]. 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.	The stockpiles of rock associated with this operation are visible on Google maps and is not north of the site. Cable Airport is immediately north, beyond which is rock quarry operation. What commenter refers to as a "net" analysis is supported by CEQA and is referred to as baseline conditions. Numerous CEQA cases support the use of the existing operations as baseline. In Association of Irritated Residents v Kern County Bd. of Supervisors (2017) 17 CA5th 708, the existing baseline of the last year of full operations at an oil refinery that had been dormant for over five years was upheld as the baseline conditions by which to compare the proposed development. Also, in San Francisco Baykeeper, Inc. v State Lands Comm'n (2015) 242 CA4th 202, 218 the court upheld the analysis of baseline emissions derived from 5 years of sand mining operations. Contrary to commenter's statement, these cases approve of the analysis in the IS/MND whereby the projected impacts are compared to the existing impacts. As stated in *Association of Irritated Residents* (at p. 734), "More specifically, the potential physical changes to the environment generally are 'identified by comparing existing physical conditions [(i.e., the baseline)] with the physical conditions that are predicted to exist at a later point in time, after the proposed activity has been implemented. [Citation.] The difference between these two sets of physical conditions is the relevant physical change' to the environment, part of which may be allocated to the project and part of which may be allocated to other causes. (*Wal-Mart Stores, Inc. v. City of Turlock* (2006) 138 Cal.App.4th 273, 289.)" Thus, the analysis under CEQA is whether the proposed project will cause greater impacts than the current operations, and if so, then CEQA analyzes only the increase in impacts above baseline. The comment incorrectly states the project would result in air quality impacts due to operational NO_X emissions exceeding SCAQMD thresholds. The project's net increase in air emissions were analyzed consistent with Appendix G, Section III(b) of the CEQA Guidelines requiring an analysis to determine whether a project would "Result in a cumulatively considerable

[29] A Google satellite image shows a processing plant *off-site,* north of the air strip.

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		net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard." As shown in Table 1 (South Coast Air Basin Attainment Status) of the ISMND, the South Coast Air Basin is designated Non-Attainment for 1-hour ozone (O_3), 8-hour O_3, and particulate matter, of which NO_x is a precursor.[30] As discussed on page 23 and Table 4 (Long-Term Operational Emissions (Maximum Pounds Per Day) of the IS/MND, the project's net emissions would not exceed SCAQMD thresholds for any criteria pollutant (including NO_x) consistent with CEQA Guidelines Appendix G, Section III(b). As such, a less than significant impact would occur at the project and cumulative level, and no mitigation is required. As discussed above, CEQA requires the analysis of a project by comparing it to existing conditions. It is the changes in environmental conditions between existing conditions and project conditions that represent the environmental impacts of the proposed project. Therefore, it is inconsistent with CEQA to assert that it is improper to evaluate the net emissions for the project site. Thus, the analysis under CEQA is whether proposed project will cause greater impacts than the current operations, and if so, then CEQA analyzes only the increase in impacts above baseline. Thus, only the impacts above baseline are analyzed as new impacts. In terms of cumulative impacts, the IS/MND properly concludes the project would not cause cumulative impacts under SCAQMD's guidelines.
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	The proposed building will not be a cold storage facility. The IS/MND does not indicate that the facility will include cold storage but rather states that operational GHG emissions take into account indirect sources such as fugitive refrigerants from air conditioning or refrigerators. The facility will include air conditioning and small refrigerators for employee use. The applicant would agree to a condition of approval providing that the project

[30] According to page 2-43 of the SCAQMD 2016 Air Quality Management Plan, "Although the Basin is in attainment of the State and federal standards, NO_2 is still of concern, since oxides of nitrogen (NO_X) are precursors to both ozone and particulate matter."

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	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.	warehouse will not be used as a cold storage facility.
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.	While the IS/MND did not identify a significant GHG impact, the project has committed to further reducing GHG emissions through a number of new measures, including installation of solar panels on the building roof, EV chargers for 30 parking spaces, and EV-ready infrastructure for all trucks, all vans, and 50% of car parking spaces, among other measures. As a result of this new solar commitment, the project building is projected to have net-zero electricity consumption. These additional sustainability commitments are described in the Supplemental GHG Analysis, included as Appendix 2. As calculated therein, the project's GHG emissions would continue to be below the significance threshold identified in the MND of 10,000 MT CO2e per year, and would also now be below 3,000 metric tons of CO2e per year even if that threshold were applicable. This supplemental GHG analysis, including these additional sustainability commitments, was also peer reviewed and confirmed by Ramboll, as noted in their memo included as Attachment 1. These additional sustainability commitments will be enforceable through PDF GHG-1 through PDF GHG-5.
I-79e	Energy Impacts 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.	The IS/MND includes an analysis of the facility's energy impacts within the Energy Resources Section of the IS/MND. CEQA does not require a stand-alone technical study. The IS/MND evaluates the project's energy impacts as they relate to the CEQA mandated thresholds of significance for energy and concluded that the proposed Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources. The project's new sustainability commitments would reduce energy and fuel consumption through a number of new measures, including installation of solar panels on the building roof, EV chargers for 30 parking spaces, and EV-ready infrastructure for all trucks, all vans, and 50% of car parking spaces, among other measures. As a result of this new solar commitment, the project building is projected to have net-zero electricity consumption. These additional sustainability commitments are described

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	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.	in the Supplemental GHG Analysis, included as Appendix 2, which are included as PDF GHG-1 through PDF-GHG-5. These Project Design Features would not only reduce GHG emissions but are also projected to eliminate the building's electricity consumption and drastically reduce the overall energy consumption. The project would be proactive in reducing energy consumption and increasing renewable energy sources in the City. The project will achieve the goals of decreasing the overall per capita energy consumption, decreasing reliance on natural gas and oil and increasing reliance on renewable energy resources.
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 20IO 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 20IO "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-	The SCAQMD has not adopted a GHG significance threshold that applies to most land use development projects. A 3,000 MT CO2e per year value was proposed as a screening threshold for land use development projects but was never adopted in any form by SCAQMD. In the absence of an adopted threshold, the lead agency has discretion to select a significance threshold. Thus, in this context, many lead agencies have applied the 10,000 MT CO2e per year as a significance threshold because it was adopted by SCAQMD, which is completely within the right and authority of a lead agency to do. Various lead agencies have used different approaches as a GHG significance threshold for warehouse development projects, including relying on the 10,000 MT CO2e per year significance threshold. Thus, the MND approach to assess the significance of GHG emissions using 10,000 MT CO2e per year is consistent with the current common approaches by lead agencies to evaluate a warehouse project's GHG emissions under CEQA. The net increase of GHG emissions analyzed for the project was prepared

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	thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-main-presentation.pdf. [31] The MND here relies upon this numerical screening threshold even though it is (I) 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 *See also,* http://www.agmd.gov/docs/default-source/cega/handbook/greenhouse-gases- (ghg)-cega-significance-thresholds/year-2008-2009/ghg-meeting-8/ghg-meeting-8- minutes.pdf 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.agmd.gov/home/rules-compliance/cega/air-guality-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 MTC02e per year. SCAQMD concluded that projects with emissions Jess than the screening threshold would not result in a significant cumulative impact." (emphasis added) In	consistent with CEQA Guidelines Section 15064.4(b)(1), which states: "A lead agency should consider the following factors, among others, when assessing determining the significance of impacts from greenhouse gas emissions on the environment: (1) The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;" The project has committed to further reducing GHG emissions through a number of new measures that are suggested by the commenter, including installation of solar panels on the building roof, EV chargers for 30 parking spaces, and EV-ready infrastructure for all trucks, all vans, and 50% of car parking spaces, among other measures. As a result of this new solar commitment, the project building is projected to have net-zero electricity consumption. These additional sustainability commitments are described in the Supplemental GHG Analysis, included as Appendix 2. As calculated therein, the project's GHG emissions would continue to be below the significance threshold identified in the MND of 10,000 MT CO2e per year, and would also now be below 3,000 metric tons of CO2e per year even if that threshold were applicable. This supplemental GHG analysis, including these additional sustainability commitments, was also peer reviewed and confirmed by Ramboll, as noted in their memo included as Attachment 1. These additional sustainability commitments will be enforceable through PDF GHG-1 through PDF GHG-5. The proposed project was already consistent with the UCAP as analyzed in Table 10 of the IS/MND and is now even more so. Moreover, the project (in both magnitude and location) is consistent with the Upland General Plan's year 2035 growth projections (see General Plan FEIR, available online here: https://www.uplandca.gov/uploads/files/DevelopmentServices/Environmental%20Review%20Documents/FINAL%20GENERAL%20PLAN%20EIR%20with%20comments%20COMBINED.pdf). The warehouse project is

[31] This hyperlink and all hyperlinks cited in this document are fully incorporated herein by reference.

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	light of the above evidence and discussion, and in the absence of any further support, this statement is misleading. *See again,* http://www.agmd.gov/home/rules-compliance/cega/air-guality-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 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.	consistent with the General Plan land use designation of C/I-MU. This land use designation was added to the General Plan when it was updated in 2015 and the emissions from development of a project consistent with the land use designation were accounted for in the UCAP. Thus, per the UCAP "the project is consistent with the CAP and will not have a potentially significant effect on the environment with respect to greenhouse gas emission" and ensures "that reduction targets can be achieved." Specific responses to the commenter's requests for additional mitigation are provided below: Goal 1: Nothing in the CAP requires that projects provide secure bike lockers. The project will comply with the California Green Building Code requirement for provision of bike racks and secure bike parking. As noted above, the project has been revised to include PDF-GHG-2 which requires EV charging stations for 30 parking spaces, and PDF-GHG-3 which requires 100% of van and trailer parking spaces, dock doors and van positions to be EV-ready. In addition, PDF-GHG-3 requires that 50% of all car parking spaces are EV-ready. Providing EV-ready spaces allows installation of the latest technology chargers at the time that electric delivery vans and trucks become operational, rather than installing charging stations immediately that become obsolete at the time that electric vans and trucks become used. In terms of requiring some percentage of the tenant fleet to be zero-emission, while the applicant will be constructing the project, the warehouse building will be leased to a future, as-yet unknown tenant which will operate it. Therefore a commitment to zero, near-zero, or 2010 model year trucks cannot be made at this time. By January 1, 2023, nearly all trucks in the state will need to have 2010 model year engines or equivalent to reduce emissions. Goal 2: The IS/MND has been updated to include PDF-GHG-5 that requires all forklifts to be electric powered, and PDF-GHG-6 that requires electric landscaping equipment, such as lawn mowers and leaf blowers, to be used on-site. Goal 3: There are no mandatory measures in the Climate Action Plan that requires the project to provide safe transportation or transit incentives. The project will comply with the California Green Building Code which

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	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.	requires designated parking for clean-air vehicles (low-emitting, fuel-efficient and carpool/van pool) and as noted above will provide EV charging stations for 30 parking spaces onsite. Goal 5. The project has been revised to include PDF-GHG-1 which requires the installation of 0.75 MW of rooftop solar. This is anticipated to result in zero net electricity consumption, which far exceeds the current Title 24 code for warehouse buildings. <u>Goal 6:</u> A landscape plan identifying all of the native plants and 1,000 trees to be planted on site was provided with the Project applications and has been added to the Final IS/MND as Attachment 7. Goal 9: The project has been revised to include PDF-GHG-1 which requires the installation of 0.75 MW of rooftop solar. This is anticipated to result in zero net electricity consumption, which far exceeds the current Title 24 code for warehouse buildings.
I-79g	<u>Noise Impacts</u> 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,*	The comment suggests construction and operational noise should be considered significant impacts in the ISMND. As discussed on page 80 of the IS/MND, the nearest sensitive uses are residential uses located approximately 1,040 feet from the project site. Based on the Inverse Square Law of sound propagation, maximum construction noise levels could reach approximately 62 dBA (based on the construction equipment required for the project) at these uses. This worst case noise level conservatively does not account for further attenuation from intervening structures or topography. According to the FHWA Roadway Construction Noise Model User's Guide, an intervening building reduces noise levels by 15 dBA. Therefore, project construction noise levels would be reduced to at least 47 dBA at the closest sensitive receptor, which is less than the ambient noise levels (i.e., 58 dBA as shown in IS/MND Table 18). As construction noise levels would be lower than ambient levels, construction noise would not be noticeable. The 76 dBA exterior noise level cited in the IS/MND would be the exterior construction noise levels at the nearest use, which is adjacent commercial and industrial uses and not considered sensitive receptors under CEQA. As noted on IS/MND page 80, the City does not establish quantitative

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	http://www.gcode.us/codes/upland/?view=desktop&topic=9-9_40-9_40100 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.gcode.us/codes/upland/?view=desktop&topic=9-9_40-9_40100	construction noise standards and construction noise is exempt between the hours of 7:00 a.m. and 6:00 p.m. Monday through Friday. Further, the project would implement Project Design Feature (PDF) NOI-1 to reduce construction noise levels consistent with Policy SAF-1 of the Upland General Plan. As discussed on pages 81 through 84 of the IS/MND, the project's operational noise levels would not exceed the City's daytime or nighttime noise standards at the nearest sensitive uses (residential uses approximately 1,040 feet of the southeast of the project site) and would not exceed City noise standards at adjacent commercial or industrial uses. As such, the project would not result in a less than significant impact related to construction and operational noise. Additionally, as discussed in the IS/MND and Acoustical Assessment, noise from all on-site operations as well as mobile operations (Project vehicles, including trucks, vans and employee cars) were analyzed and determined to be less than significant. Nighttime noise levels were considered and included in the analysis; in fact, the traffic noise analysis used a 24-hour noise metric that accounts for noise sensitivity during evening and nighttime hours. As stated above, the nearest sensitive uses are residential uses located approximately 1,040 feet from the project site which would not be significantly impacted by the project's operations.
I-79h	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: • 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).	The Applicant has agreed to enforceable Conditions of Approval that would limit the Project trucks to a maximum of 5 during the daytime, and 25 in total per day, which addresses the first three bullet points. Based on the proposed site plan, trucks can only feasibly access the truck loading area from Central Ave./Foothill Blvd., nonetheless the Applicant has also agreed to make this an enforceable Condition of Approval. The applicant has also agreed to a condition that no trucks are permitted on residential streets. 13th Street is included in the traffic study as access for cars and vans to the project site and was assigned a distribution of trips. Figure 4 in the TIA shows the Project's trip distribution assignments including the intersection at Benson Avenue and 13th Street.

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	• 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.	
Letter from C. Aldworth , dated January 21, 2020		
I-80	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.	Comment in support of the Project is noted. While tax revenue to the City is outside the scope of the environmental analysis in the IS/MND, the project's proposed Development Agreement provides for an annual contribution for road maintenance, with the term of the contribution to be determined as part of the public review process. This annual contribution would be just part of the project's multi-million dollar financial commitment to the City included in the proposed Development Agreement, and in addition to the $2.5 million in City fees that the project will also be paying. The annual contribution is intended to replicate what the City could theoretically collect in sales tax from a retail project of similar size—however, at this dollar amount, the project's proposed annual contribution is the equivalent of a top 10 sales tax producer for the City. Additionally, while sales tax is variable (and mostly down over the last decade), and retail is generally declining, this would be guaranteed revenue for the City, and, again, would make the project one of the largest revenue sources for the City.
Letter from C. Spencer, dated December 30, 2020		

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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	The Project site is located in the Commercial/Industrial Mixed-Use (C/I-MU) zone of the City, and the proposed warehouse therefore is a permitted use for the property. The Project is also consistent with the land uses surrounding the property, which includes Cable Airport and a rock quarry to the north, commercial uses to the south and east, and industrial uses to the west. There are already existing warehouses and industrial uses in the City of Upland, in designated and zoned areas where those uses are appropriate distances from homes, therefore this Project would not be the first of this type of use in the City. The IS/MND thoroughly analyzed all thresholds required by the CEQA Guidelines and determined that the Project would result in no significant impacts after mitigation; impacts to noise, including roadway noise, would be mitigated to a less than significant level. Even with all of the project-related vehicles, including trucks, vans and employee vehicles, during the peak hours (i.e. when the greatest number of cars are on the road in both the morning and afternoon), the project will add less than 1% to the existing traffic on Baseline, approximately 2% to the existing traffic on Benson, and less than 5% to Foothill. All of the project's trips would create less than a third of the traffic generated by retail store(s) the same size as the proposed project, and would generate far less truck traffic. Therefore the proposed project, even including all the project vans, is a much lower traffic generator than other uses permitted by the zoning for this property. Additionally, the traffic study also overestimates the trips created by the project, as it is based on a 276,000 square foot building, and the building was downsized further to only 201,000 square feet since preparation of the traffic study. That's a nearly 28% reduction compared to the building analyzed in the traffic study, therefore the trip generation will likely be even less than what's presented in the traffic study. A detailed noise technical analysis was prepared and included in Appendix G of the IS/MND, which analyzed noise from all Project vehicles, including trucks, vans and employee cars. This analysis determined that Project generated roadway noise would not create an audible difference in noise volumes compared to existing conditions. All roadway noise impacts

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	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.	would be less than significant. While economic impacts are outside the scope of the IS/MND, a Development Agreement is part of the project's entitlements which proposes millions of dollars in contributions for the City, in addition to the City's standard development impact fees. These contributions would go towards road maintenance, police, parks, education, local businesses and other civic improvements. Additionally, Bridge's investment in the property and other off-site improvements could expand the City's tax revenue base in the future. The project will create 300 permanent employees in the building who will want to eat and buy goods and services at neighboring stores. Not only will the project be adding 1,000 new trees and nearly 11 acres of landscaping on the property, but the project will also be paying for and installing new landscaping, curbs, gutters and sidewalks over approximately 1,000 linear feet of Foothill Boulevard as detailed in the Development Agreement. These improvements will enhance the aesthetics and attractiveness of the street and could make the currently vacant lots on Foothill more attractive to development, including retail. The project could serve as an economic catalyst for the Foothill Blvd corridor that will have long-lasting tax revenue benefits for the City.
Letter from R. Stephenson, dated January 21, 2020		
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	The IS/MND prepared for the Project thoroughly analyzes all thresholds required by the CEQA Guidelines. In accordance with the CEQA Guidelines, the IS/MND evaluated the required environmental analysis of 20 environmental areas. Further, the IS/MND overestimates the Project's environmental impacts as it analyzed a 276,250 sf building; the Project has since been further reduced in size by 75,154 sf, or nearly 28% to the currently proposed 201,096 sf building. The IS/MND provides a comprehensive and thorough analysis of the environmental impacts of the Project as required by the CEQA Guidelines. Accordingly, the IS/MND includes more than 1,800 pages of environmental analysis, including 10 technical studies and evaluated all required

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	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 DLA?, 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** 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.	thresholds required by CEQA and City requirements. With regard to the comments on the project description and plans, plans have been provided to the City as part of the project's applications and are available for public review which provide the scale, elevations, finished grade, cross-sections, and other details requested by the commenter. As relevant information was considered as part of the IS/MND. The IS/MND thoroughly analyzed all thresholds required by the CEQA Guidelines and determined that the Project would result in no significant impacts after mitigation; impacts to aesthetics, including visual impacts, were found to be less than significant. All project-related vehicles, including employee vehicles, delivery vans, and trucks, were considered and analyzed as part of the IS/MND and traffic analysis. ITE rates for warehouses are based on building square footage, since trip generation is connected to building storage capacity. The area of van loading is not associated with trip generation according to the ITE Manual. The proposed project provides the "last mile" of the online customer order delivery process. Packages will be shipped to this location from much larger fulfillment and sortation centers, sorted and stored based on address and delivery timing, loaded into small delivery vans, and then delivered to nearby residents. Van drivers will travel to the project site with their personal vehicles (or public transit), park their personal vehicles on site, and then pick up the loaded vans for deliveries. Vans are then returned to their parking location on site after completion of the deliveries, and drivers leave the project site in their personal vehicles or public transit as applicable. Van deliveries will occur at daytime and evening hours, but home deliveries will not generally occur at night. However, a maximum of only 5 trucks will travel to/from the site during daytime hours, with a total of only 25 daily. The last mile facility is a 24-hour operation, however the nighttime operations will consist of unloading the truck deliveries, sorting the packages and goods and then storing the packages and goods (all inside the building) and will not include van deliveries.

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	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/1-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	While understanding the concern regarding the number of van parking spaces proposed on site, van parking spaces are not an indicator of actual trip generation. Rather, the trip generation rate is appropriately based on building square footage because building square footage represents the total amount of goods/delivery capacity of a building. The number of van deliveries is capped by the size, i.e. capacity, of the building to store goods for delivery. This is why the ITE trip generation rate is based on building square footage, and not van parking spaces. Further, in this case, total van deliveries (and, thus, trip generation) is limited due to the daily truck delivery cap. Nevertheless, the number of van parking spaces can be an indicator of factors unrelated to actual van delivery needs, such as lease terms between developer and tenant. For instance, since a tenant frequently pays a developer based on total land area developed, additional developed area (including parking spaces) may be a function of lease price rather than parking demand. The Project site is located in the Commercial/Industrial Mixed-Use (C/I-MU) zone of the City, and the proposed warehouse is therefore is a permitted use for the property. The project is also consistent with the land uses surrounding the property, which includes Cable Airport and a rock quarry to the north, commercial uses to the south and east, and industrial uses to the west. There are already existing warehouses and industrial uses in the City of Upland, in designated and zoned areas where those uses are appropriate distances from homes, therefore this project would not be the first of this type of use in the City. The Project is a warehouse facility consistent with Section 17.51.010 of the City's Municipal Code which Code defines warehousing as the provision of facilities used primarily for the storage of commercial goods, including documents. The Project is located within the C/I-MU zone, and Section 17.05.020 of the City's Municipal Code identifies warehousing as a permitted use within the C/I-MU zone. The General Plan is consistent with the Municipal Code and identifies that warehousing is an allowable use within the C/I-MU zone. The project is also consistent the General Plan's description of the C/I-MU zone as

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	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** 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, 1oth 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	follows: "The Commercial/Industrial Mixed-Use designation is designed to accommodate a variety of industrial and regional retail uses and to support commercial activities to satisfy a range of shopping needs for residents of the community. It is also intended to encourage development of business in the City and to maximize the potential for job generation. Uses supported under this category include commercial and industrial. Typical industrial uses could include limited general industrial, manufacturing, assembly, warehousing, multi-tenant industrial, research and development, and airport–related uses. Typical commercial uses include retail commercial and durable sales goods, tourist-related commercial, entertainment, recreational uses, administrative and professional offices, commercial activities, business support services, food and institutional uses, as well as residential, subject to a reasonable minimum increment of land area as well as a special use permit process." (emphasis added) The project is also consistent with the following General Plan policy of the City: "Policy LU-3.2 Economic Revitalization. Promote the development of vacant and underutilized parcels with higher intensity commercial and industrial land uses." First, the commenter disagrees with the use of the Institute of Transportation Engineers (ITE), but ITE is the authority on trip generation used by essentially every lead agency in California. ITE bases trip generation for all types of warehouses on building square footage because building square footage represents the total delivery capacity of a building. For a last mile facility which the proposed project may be used for and therefore is conservatively analyzed as, the number of van deliveries is capped by the size, i.e. capacity, of the building to sort and store goods for delivery. Further, in this case, the capacity of the building is limited due to the cap on daily trucks, which is limited to 25 trucks/50 truck trips per day through enforceable Conditions of Approval that the Applicant has agreed to. This project is a last mile warehouse that is the last step in the warehouse supply chain before a package reaches a customer. A High Cube Parcel Hub warehouse (ITE code 156) reflects delivery/shipping facilities like UPS and

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	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 1oth 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	FedEx which are engaged in package delivery directly to customers. This is the closest approximation to a last mile warehouse facility like the one proposed by the project. The typical function of a last mile or Parcel Hub warehouse is to act as a regional and local freight-forwarder facility for time-sensitive shipments via air freight and ground (e.g., UPS, FedEx, USPS). While it is true that many Fedex/UPS vehicles are 6-tire vehicles, they also use 4-tire vehicles such as Mercedes Sprinter vans. The CEQA Guidelines provide that analysis is based on the operational and construction related environmental impacts of a project and does not consider the owner or prospective tenant in that analysis. The scope of the City's Municipal Code does not provide authority for the City to determine or review the choice of tenant that may occupy the building. Friends of Davis v. City of Davis (2000) 83 Cal.App.4th 1004, 1013-14. Further, no tenant has signed a lease to operate the Project at this time. However, while the tenant has not been determined at this time, any future operator of the Project would be required to comply with all mitigation measures, conditions of approval and commitments contained in the Development Agreement approved for the proposed Project. Any future operator on the Project site would also be required to comply with the uses approved for the site. The commenter is correct that a typical parcel hub has approximately 20% truck percentage. This is primarily because 2-axle trucks (6-tire) are categorized as trucks. However because the project is limited to 25 trucks per day (50 truck trips), this was the number included in the project's traffic study. Considering the largest truck with a capacity of 3,914 cubic-feet per trailer, the total incoming cargo would be 97,850 cubic feet of cargo. A typical Delivery Van has a capacity of 329 cubic feet. Even if the vans are filled to 80% capacity, the number of vans per day would be approximately 372 per day. Considering that the trip generation assumed in the project's traffic study is 2,483 with 2,433 automobile trips and 50 large truck trips, the project's traffic study is conservative. The commenter questions the validity of the trip generation for the project. Within the ITE Trip Generation Manual, the most intense trip generation is from the High Cube Fulfillment Center Warehouse

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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.

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.

(significantly higher than a High Cube Parcel Hub warehouse during the p.m. peak hour, but lower during the a.m. and daily). Therefore, an analysis was conducted to see if there would be additional impacts if the higher rates during the p.m. peak hour were used.

If the average rate from ITE for High Cube Fulfillment Centers were applied to the proposed Project, the respective trip generation estimates of the proposed 201,000 SF facility would be:

Table A - Project Trip Generation Using ITE Average High Cube Fulfillment Center Rates

			Peak Hour						
			AM Peak Hour			PM Peak Hour			Daily
Land Use		Units	In	Out	Total	In	Out	Total	
High-Cube Fulfillment Center Warehouse	201.0	Per TSF	0.295	0.295	0.590	0.932	0.438	1.370	7.750
Passenger Vehicles Inbound/Outbound Splits			50%	50%	100%	68%	32%	100%	50%/50%
Total Vehicles			59	60	119	187	89	276	1,558
Passenger Cars			57	57	114	183	87	270	1,418
2-3 Axle Trucks			2	2	4	4	2	6	125
4+ Axle Trucks			0	1	1	0	0	0	15
Total Trucks			2	3	5	4	2	6	140
Truck PCEs			4	7	11	8	4	12	295
Total Trip Generation (PCE)			63	67	130	195	93	288	1,853

As seen above, the trip generation would be substantially lower for the daily trips and a.m. peak hour but slightly higher during the p.m. peak hour. An analysis was conducted for 2040 conditions because traffic volumes are highest during that analysis scenario. The Table below shows a comparison of the LOS under Year 2040 LOS using rates for Fulfillment Center and Parcel Hub. As seen on the table, there is minimal change in delay and none of the LOS grades change. Since the LOS at all intersections are acceptable under 2040 conditions, the intersections will also operate at satisfactory LOS under Opening Year 2020 conditions. Therefore, the projects impacts are less than significant.

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	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 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.	**Table F: Year 2040 With Project Intersection Levels of Service (Comparison of Parcel Hub & Fulfillment Center)** |	Intersection | LOS Std. | Jurisdiction | Control | PM Peak Hour (With Project Conditions) Land Use 156 (from TIA) Delay | LOS | ITE Land Use 155 (Fulfillment Center) Delay | LOS | Delay Change (sec.) | |---|---|---|---|---|---|---|---|---| | 1 | Monte Vista Avenue/Baseline Road | E | Claremont | Signal | 27.1 | C | 27.2 | C | 0.1 | | 2 | SR-210 Ramps/Baseline Road | D | Caltrans | Signal | 42.4 | D | 42.5 | D | 0.1 | | 3 | Benson Avenue/Baseline Road | D | Upland | Signal | 45.8 | D | 46.5 | D | 0.7 | | 4 | Benson Avenue/15th Street | D | Upland | Signal | 5.4 | A | 5.4 | A | 0.0 | | 5 | Benson Avenue/13th Street | D | Upland | Signal | 29.4 | C | 29.6 | C | 0.2 | | 6 | Monte Vista Avenue/Foothill Boulevard | D | Upland | Signal | 36.9 | D | 37.2 | D | 0.3 | | 7 | Central Avenue/Foothill Boulevard | D | Upland | Signal | 33.3 | C | 33.4 | C | 0.1 | | 8 | Project Driveway/Foothill Boulevard | D | Upland | TWSC | 10.6 | B | 10.6 | B | 0.0 | | 9 | Benson Avenue/Foothill Boulevard | D | Upland | Signal | 50.8 | D | 51.2 | D | 0.4 | | 10 | Central Avenue/11th Street | D | Upland | Signal | 29.0 | C | 29.2 | C | 0.2 | | 11 | Central Avenue/Arrow Route | D | Upland | Signal | 30.9 | C | 31.1 | C | 0.2 | | 12 | Central Avenue/Arrow Highway | D | Montclair | Signal | 47.1 | D | 47.2 | D | 0.1 | | 13 | Central Avenue/Moreno Street | D | Montclair | Signal | 33.3 | C | 33.4 | C | 0.1 | | 14 | Central Avenue/I-10 Westbound Ramps | D | Caltrans | Signal | 12.2 | B | 12.5 | B | 0.3 | | 15 | Central Avenue/I-10 Eastbound Ramps | D | Caltrans | Signal | 24.2 | C | 24.2 | C | 0.0 | | 16 | Project Driveway 2/Foothill Boulevard | D | Upland | TWSC | 12.7 | B | 12.8 | B | 0.1 | | 17 | Monte Vista Avenue/Claremont Boulevard | E | Claremont | Signal | 15.2 | B | 15.2 | B | 0.0 | Notes: * Exceeds LOS Standard TWSC = Two-Way Stop Control; For TWSC intersections, reported delay is for worst-case approach/movement. LOS = Level of Service The commenter also states that the peak delivery season be evaluated in the analysis. However, the peak season which typically lasts from after Thanksgiving to Christmas constitutes one month of the 12-month year. However, for a last mile facility which the proposed project may be used for and therefore is conservatively analyzed as, the number of van deliveries is capped by the size, i.e. capacity, of the building to sort and store goods for delivery. Further, in this case, the capacity of the building is limited due to the cap on daily trucks, which is limited to 25 trucks/50 truck trips per day through enforceable Conditions of Approval that the

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	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.	Applicant has agreed to. Finally, all retail uses have a peak season (Thanksgiving to Christmas) and seasonality is never evaluated for retail trip generation. The analysis included in the TIA shows a conservative analysis with typical operations, which is more than 90% of the year. According to the ITE, a shopping center is an integrated group of commercial establishments that is planned, developed, owned, and managed as a unit. Shopping centers, including neighborhood centers, community centers, regional centers, and super regional centers, were surveyed for this land use. Although the primary use is typically retail, some of these centers contained non-merchandising facilities, such as office buildings, movie theaters, restaurants, post offices, banks, health clubs, and recreational facilities. Many shopping centers, in addition to the integrated unit of shops in one building or enclosed around a mall, include outparcels (peripheral buildings or pads located on the perimeter of the center adjacent to the streets and major access points). These buildings are typically drive-in banks, retail stores, restaurants, or small offices. In fact, the Junction Plaza center on the South side of Foothill west of Benson would qualify as a shopping center. The following commercial land uses that are permitted by right on the project site would fit within the shopping center ITE code (see City of Upland Zoning Ordinance, section 17.05.020: • Retail Stores, General Merchandise • Banks and Credit Unions • Restaurants (full service, limited service, takeout) • Bicycle Rental, Sales, and Repair • Supermarket • General Market • Bakery • Drop off Dry Cleaners • Secondhand Goods Store • Personal Services

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	• 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. 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.	Because a shopping center use would be permitted under the General Plan and zoning ordinance, the retail analysis is not moot and has not been deleted from the IS/MND. Significant numbers of passenger cars from the project are unlikely to use 13th Street east of Benson and other smaller streets. Please note that based on the analysis guidelines, an intersection requires analysis if the project adds more than 50 peak hour trips to the intersection. Based on the trip generation of the project, more than 25% of the project trips (cars, vans, and trucks) would have to travel on a street for an intersection to require analysis. The Project truck trip distribution was developed based on review of the freeway network relative to the Project site and based on discussion with City staff. Most of the warehouses in the area from which the Project's Last Mile facility would get its goods are along the I-10 freeway. Regardless, the project is anticipated to generate only 1 truck (2 trips, one inbound and one outbound) during each of the AM and PM peak hours, given the Project's limitation of only 5 truck during the day. Therefore, since 1 truck could not be divided into two routes (one to the I-10 and one to the I-210), the I-10 was chosen given the closer proximity to nearby warehouses from which the project's Last Mile facility would receive its packages Even if this one truck trip was assumed to go to the I-210, the traffic study's significance conclusions would not change. Most of the Project's trucks would travel to and from the freeways at night, well outside the peak hours, when the least number of vehicles are on the road. City staff has advised that the General Plan map online is incorrect and the correct General Plan map (which is available for public review at the City) shows Central Avenue as a Truck Route.
Letter from J. Marks, dated January 20, 2020		
I-83	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	The IS/MND thoroughly analyzed all thresholds required by the CEQA Guidelines and determined that the Project would result in no significant impacts after mitigation; impacts to traffic and pedestrian safety would be mitigated to a less than significant level.

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	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.	The Traffic Impact Assessment (TIA) prepared for the Project (Appendix H-1) and accounted for the trucks, vans, and passenger cars anticipated to utilize the Project. As analyzed in the IS/MND, a total of 25 trucks per day (total of 50 truck trips) would access the project site, primarily overnight. Of these 25 trucks, 5 would access the Project during daytime hours, resulting in a reduction from current conditions. Even with all of the project-related vehicles, including trucks, vans and employee vehicles, during the peak hours (i.e. when the greatest number of cars are on the road in both the morning and afternoon), the project will add less than 1% to the existing traffic on Baseline, approximately 2% to the existing traffic on Benson, and less than 5% to Foothill. All of the project's trips would create less than a third of the traffic generated by retail store(s) the same size as the proposed project, and would generate far less truck traffic. Therefore, the proposed project, even including all the project vans, is a much lower traffic generator than other uses permitted by the zoning for this property. Additionally, the traffic study also overestimates the trips created by the project, as it is based on a 276,000 square foot building, and the building was downsized further to only 201,000 square feet since preparation of the traffic study. That's a nearly 28% reduction compared to the building analyzed in the traffic study, therefore the trip generation will likely be even less than what's presented in the traffic study. The IS/MND thoroughly analyzed all thresholds required by the CEQA Guidelines and determined that the Project would result in no significant impacts after mitigation; impacts to traffic and noise would be mitigated to a less than significant level. The Project is consistent with the Commercial/Industrial Mixed-Use (C/I-MU) zoning designated in the City's General Plan for the proposed site and consistent with the adjacent surrounding land uses which include properties zoned for highway commercial uses to the south, Cable Airport to the north, industrial uses to the west, and commercial uses, including a Lowe's Home Improvement Store and a commercial shopping center to the east. The Project site is located in the Commercial/Industrial Mixed-Use (C/I-MU) zone of the City, and the proposed warehouse is therefore is a permitted use for the property. The project is also consistent with the land uses surrounding the property, which includes Cable Airport and a rock

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		quarry to the north, commercial uses to the south and east, and industrial uses to the west. There are already existing warehouses and industrial uses in the City of Upland, in designated and zoned areas where those uses are appropriate distances from homes, therefore this project would not be the first of this type of use in the City. With regard to road maintenance, in addition to the standard project fees which includes nearly $500,000 for roads (i.e., this is the amount the City collects to pay for new road improvements and maintenance as a result of any new project and it is based on the size and use of the project), the project's Development Agreement includes an annual contribution for road maintenance, with the term of the contribution to be determined as part of the public review process. This annual contribution is intended to replicate what the City could theoretically collect in sales tax from a retail project of similar size—however, at this dollar amount, the project's proposed annual contribution is the equivalent of a top 10 sales tax producer for the City. Additionally, while sales tax is variable (and mostly down over the last decade), and retail is generally declining, this would be guaranteed revenue for the City, and, again, would make the project one of the largest revenue sources for the City.
Letter from J, Marotte, dated January 20, 2020		
I-84	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	Comment in support of the Project is noted.

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	area.	
Letter from K. Gooding, dated January 21, 2020		
I-85	As a 25+ year resident of the city of Upland, I am voicing my opposition to the Bridge Point Upland Project. 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. o For example, page 1100 of the MND* says *"circulation improvements are proposed at Benson Avenue/Baseline Road and include re-striping the northbound through Jane to* a *through-left turn lane and convert the northbound and southbound left-tum phasing from protected to split-phase[. ..] The total cost of these*	The IS/MND prepared for the Project thoroughly analyzes all thresholds required by the CEQA Guidelines. In accordance with the CEQA Guidelines, the IS/MND evaluated the required environmental analysis of 20 environmental areas. Further, the IS/MND overestimates the Project's environmental impacts as it analyzed a 276,250 sf building; the Project has since been further reduced in size by 75,154 sf, or nearly 28% to the currently proposed 201,096 sf building. The Project site is located in the Commercial/Industrial Mixed-Use (C/I-MU) zone of the City, and the proposed warehouse is therefore is a permitted use for the property. The project is also consistent with the land uses surrounding the property, which includes Cable Airport and a rock quarry to the north, commercial uses to the south and east, and industrial uses to the west. There are already existing warehouses and industrial uses in the City of Upland, in designated and zoned areas where those uses are appropriate distances from homes, therefore this project would not be the first of this type of use in the City. The Traffic Impact Assessment (TIA) prepared for the Project (Appendix H-1) and accounted for the trucks, vans, and passenger cars anticipated to utilize the Project. As analyzed in the IS/MND, a total of 25 trucks per day (total of 50 truck trips) would access the project site, primarily overnight. Of these 25 trucks, 5 would access the Project during daytime hours, resulting in a reduction from current conditions. While new trips would be created, all of the project's trips – including employee cars, vans, and trucks – would still create less than a third of the traffic generated by retail store(s) the same size as the proposed project. Therefore the proposed project, even including all the project vans, is a much lower traffic generator than other uses permitted by the zoning for this property. The commenter misunderstands the mitigation measure fair share payment noted. The project will be paying its fair share portion of the

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	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	mitigation based on the project's percentage of trips to that intersection. Other projects also send trips to that intersection, and will be required to pay their respective fair share of the improvement as well. The project will not require mitigation that will be paid for by the City. Even with all of the project-related vehicles, including trucks, vans and employee vehicles, during the peak hours (i.e. when the greatest number of cars are on the road in both the morning and afternoon), the project will add less than 1% to the existing traffic on Baseline, approximately 2% to the existing traffic on Benson, and less than 5% to Foothill. All of the project's trips would create less than a third of the traffic generated by retail store(s) the same size as the proposed project, and would generate far less truck traffic. Therefore, the proposed project, even including all the project vans, is a much lower traffic generator than other uses permitted by the zoning for this property. Additionally, the traffic study also overestimates the trips created by the project, as it is based on a 276,000 square foot building, and the building was downsized further to only 201,000 square feet since preparation of the traffic study. That's a nearly 28% reduction compared to the building analyzed in the traffic study, therefore the trip generation will likely be even less than what's presented in the traffic study. Per the CEQA Guidelines, the project analyzes 20 resource categories. Economic viability, presumed need, and tax revenue are not required to be evaluated under the CEQA Guidelines and is therefore out of the scope of the IS/MND analysis. A tenant has not yet been identified for the Project, and the scope of the City's Municipal Code does not provide authority for the City to determine or review the choice of tenant that may occupy the building. Friends of Davis v. City of Davis (2000) 83 Cal.App.4th 1004, 1013-14. While the tenant has not been determined at this time, any future operation on the Project site would be subject to the same mitigation measures, conditions of approval and provisions contained in the Development Agreement as the proposed Project. Any future use on the Project site would be required to comply with the uses approved for the site. Those are binding and enforceable commitments associated with the

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	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. o 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. o 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• o The MND 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. o 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	Project. Accordingly, however, CEQA Guidelines provide that analysis is based on the operational and construction related environmental impacts of a project and does not consider the owner or prospective tenant in that analysis. While tax revenue to the City is outside the scope of the environmental analysis in the IS/MND, the project's proposed Development Agreement provides for an annual contribution for road maintenance, with the term of the contribution to be determined as part of the public review process. This annual contribution would be just part of the project's multi-million dollar financial commitment to the City included in the proposed Development Agreement, and in addition to the $2.5 million in City fees that the project will also be paying. The annual contribution is intended to replicate what the City could theoretically collect in sales tax from a retail project of similar size—however, at this dollar amount, the project's proposed annual contribution is the equivalent of a top 10 sales tax producer for the City. Additionally, while sales tax is variable (and mostly down over the last decade), and retail is generally declining, this would be guaranteed revenue for the City, and, again, would make the project one of the largest revenue sources for the City. A total of three field visits were made to the Project site during various seasons over the past year by two different biological consulting firms. The first was conducted on March 29, 2018 by ELMT Consulting, Inc. This field visit determined that, based on habitat requirements for specific special-status plant species and the availability and quality of habitats needed by each species, the Project site does not provide suitable habitat for any of the special-status plant species known to occur in the area and are presumed to be absent from the Project site. The second site visit that occurred in August 2019 was adequate to assess the potential for sensitive species to occur on the Project site. Although the site visit occurred during a time when many plants are not present, the biologist determined that site conditions were not suitable for any special-status plant species to occur during any time of the year. As discussed in the IS/MND and the November 2019 Habitat Assessment prepared for the Project, the site is heavily disturbed due to a variety of human-related

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	(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. o 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. o 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	disturbances such as sand and gravel processing, illegal dumping and homeless encampments. As such, the site does not provide suitable habitat for any Federal or State threatened and endangered species. Finally, a third site visit was conducted on January 22, 2020 by a biologist from Rocks Biological Consulting, a second and independent firm from ELMT Consulting, Inc. , (which prepared the IS/MND's Habitat Assessment). Rocks Biological Consulting prepared the Supplemental Project Field Survey Memorandum (included as Attachment 5) which concurred that there is no potential for federally or state-listed as threatened or endangered plant or wildlife species to occur on the project site. The traffic study used the ITE Trip Generation rate for "High-Cube Parcel Hub Warehouse", which is a package delivery type land use, consistent with the proposed use. A High Cube Parcel Hub warehouse reflects delivery/shipping facilities like UPS and FedEx which are engaged in package delivery directly to customers. This is the closest approximation to a Last Mile warehouse like the one proposed by the project. This ITE rate included trips generated by all Project-related vehicles, including trucks, vans, and employee cars traveling to and from the site. The traffic study also looked at traffic generated during the peak hours of the day, meaning the hour in the morning and hour in the afternoon when the greatest number of cars are on the road. The traffic study was completed consistent with all adopted methodology and guidelines. Additionally, the traffic study also overestimates the trips created by the Project, as it is based on a 276,000 square foot building, and the building was downsized further to only 201,000 square feet since preparation of the traffic study. That's a nearly 28% reduction compared to the building analyzed in the traffic study, therefore the trip generation will likely be even less than what's presented in the traffic study. Impacts to emergency services, including fire and police, were thoroughly analyzed in the IS/MND, Section 15. The IS/MND's noise study did analyze both mobile noise from cars, vans and trucks, and noise from on-site operations. The Project would not

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	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. o 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. o 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	generate a perceivable traffic noise increase from mobile sources or from on-site operations. Traffic noise was modeled and discussed in the IS/MND and project Acoustical Assessment. The traffic volumes are based on existing and Project specific traffic data. As shown in Table 10 and Table 11 of the Acoustical Assessment, the greatest increase in noise between with and without Project conditions would occur on Central Avenue between Foothill Blvd and 11th Street. At this location, traffic noise would increase by 0.7 dBA which is below the human ear's ability to perceive. Therefore, as stated in the Acoustical Assessment, traffic noise impacts would be less than significant. It should be noted that the Project would generate daily 50 truck trips, which is less than the dozens of truck trips currently occurring from the rock crushing operations. The noise analysis conservatively did not take credit for the existing trucks on the site that would no longer occur if the Project was operational. Detailed technical studies, including a traffic study, analyzing the potential environmental impacts of the proposed Project determined that all impacts would be less than significant either before or after mitigation, therefore an IS/MND is the appropriate environmental document consistent with CEQA, and an EIR is not required. Nonetheless, all of the technical studies included in the Project's IS/MND are the exact same technical studies that would have been included in an EIR. Each study's level of detail and thorough, comprehensive analysis is the same between this Project's IS/MND and an EIR. The only technical analysis that would have been in an EIR, that is not in an IS/MND, is an evaluation of alternatives to the Project. Therefore, there is no project-specific analysis that is missing from this IS/MND which would have been included in an EIR for the Project. The IS/MND provides a comprehensive and thorough analysis of the environmental impacts of the Project as required by the CEQA Guidelines. Accordingly, the IS/MND includes more than 1,800 pages of environmental analysis, including 10 technical studies and evaluated all required thresholds required by CEQA and City requirements.

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	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	

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	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 • 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-21O'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:	

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	• conduct a full Environmental Impact Report. o 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.	
Letter from L. Trawnik, dated January 21, 2020		
I-86	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.	Comment in support of the Project is noted.
Letter from M. Chitre, dated January 2, 2020		
I-87	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.	The comment is noted. The comment does not raise any issues or address the adequacy of the IS/MND, and thus no further response is needed.
Letter from M. Hart, dated January 15, 2020		
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 Bo's. At that time it was a quiet, peaceful street with very little traffic. We	The Project site is located in the Commercial/Industrial Mixed-Use (C/I-MU) zone of the City, and the proposed warehouse therefore is a permitted use for the property. The Project is also consistent with the land uses surrounding the property, which includes Cable Airport and a rock quarry to the north, commercial uses to the south and east, and industrial

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	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 the13th 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/13 th 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.	uses to the west. There are already existing warehouses and industrial uses in the City of Upland, in designated and zoned areas where those uses are appropriate distances from homes, therefore this Project would not be the first of this type of use in the City. As discussed in the IS/MND and the traffic study, the Project would result in a maximum of 5 trucks during daytime hours, resulting in a reduction from current conditions. The traffic study found that the Project would not conflict with the adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities and would not decrease the performance or safety of such facilities. Additionally, the traffic study also overestimates the trips created by the Project, as it is based on a 276,000 square foot building, and the building was downsized further to only 201,000 square feet since preparation of the traffic study. That's a nearly 28% reduction compared to the building analyzed in the traffic study, therefore the trip generation will likely be even less than what's presented in the traffic study. Trucks would be prohibited on 13th Street adjacent to the Project site. Additionally, the Applicant has agreed to enforceable Conditions of Approval that would limit the truck access on 13th Street. The IS/MND thoroughly analyzed all thresholds required by the CEQA Guidelines and determined that the Project would result in less than significant impacts after mitigation; impacts to traffic, including pedestrian safety, would be mitigated to a less than significant level.
Letter from M. Kelly, dated January 19, 2020		
I-89	I'm writing to convey my intense opposition to the proposed gigantic Amazon warehouse distribution facility. Please do not approve this land use. 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.	The comment is noted. The comment does not raise any issues or address the adequacy of the IS/MND, and thus no further response is needed.

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Letter from M. Mikels, dated January 20, 2020		
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. **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	No tenant has been identified for this Project, and the scope of the City's Municipal Code does not provide authority for the City to determine or review the choice of tenant that may occupy the building. Friends of Davis v. City of Davis (2000) 83 Cal.App.4th 1004, 1013-14. Additionally, any tenant that operates the proposed building will be required to abide by all mitigation measures, conditions of approval, and commitments made in the Development Agreement adopted for this Project, and be consistent with the environmental analysis contained in the IS/MND. Accordingly, CEQA Guidelines provide that analysis is based on the operational and construction related environmental impacts of a project and does not consider the owner or prospective tenant in that analysis. While economic impacts are outside the scope of the IS/MND, a Development Agreement is part of the project's entitlements which proposes millions of dollars in contributions for the City, in addition to the City's standard development impact fees. These contributions would go towards road maintenance, police, parks, education, local businesses and other civic improvements. Additionally, Bridge's investment in the property and other off-site improvements could expand the City's tax revenue base in the future. The project will create 300 permanent employees in the building who will want to eat and buy goods and services at neighboring stores. Not only will the project be adding 1,000 new trees and nearly 11 acres of landscaping on the property, but the project will also be paying for and installing new landscaping, curbs, gutters and sidewalks over approximately 1,000 linear feet of Foothill Boulevard as detailed in the Development Agreement. These improvements will enhance the aesthetics and attractiveness of the street and could make the currently vacant lots on Foothill more attractive to development, including retail. The project could serve as an economic catalyst for the Foothill Blvd corridor that will have long-lasting tax revenue benefits for the City. As the commenter notes, the Project site, along with the majority of the City of Upland is located within a Dam Inundation Area as shown on the

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	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	San Bernardino County Hazard Map. As identified in the EIR for the City's General Plan, the possibility of inundation due to failure of a dam is remote. The San Bernardino County Hazard Map also identifies that the Project site is not located within a 100 or 500 Year Flood Plain and is not identified as a Local Flood Hazard. As discussed in the IS/MND, the proposed Project is not located in a flood zone and therefore does not does result in a significant impact related to the risk of release of pollutants due to project inundation within a flood hazard, tsunami, or seiche zones. The Project site is located in the Commercial/Industrial Mixed-Use (C/I-MU) zone of the City, and the proposed warehouse is therefore is a permitted use for the property. The project is also consistent with the land uses surrounding the property, which includes Cable Airport and a rock quarry to the north, commercial uses to the south and east, and industrial uses to the west. There are already existing warehouses and industrial uses in the City of Upland, in designated and zoned areas where those uses are appropriate distances from homes, therefore this project would not be the first of this type of use in the City. The Project is a warehouse consistent with Section 17.51.010 of the City's Municipal Code which Code defines warehousing as the provision of facilities used primarily for the storage of commercial goods, including documents. The Project is located within the C/I-MU zone, and Section 17.05.020 of the City's Municipal Code identifies warehousing as a permitted use within the C/I-MU zone. The General Plan is consistent with the Municipal Code and identifies that warehousing is an allowable use within the C/I-MU zone. The project is also consistent the General Plan's description of the C/I-MU zone as follows: "The Commercial/Industrial Mixed-Use designation is **designed to accommodate a variety of industrial** and regional retail uses and to support commercial activities to satisfy a range of shopping needs for residents of the community. **It is also intended to encourage development of business in the City and to maximize the potential for job generation.** Uses supported under this category include commercial and industrial. **Typical industrial uses could include limited general industrial,**

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	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. 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	**manufacturing, assembly, warehousing, multi-tenant industrial, research and development, and airport–related uses**. Typical commercial uses include retail commercial and durable sales goods, tourist-related commercial, entertainment, recreational uses, administrative and professional offices, commercial activities, business support services, food and institutional uses, as well as residential, subject to a reasonable minimum increment of land area as well as a special use permit process." (emphasis added) The project is also consistent with the following General Plan policy of the City: "Policy LU-3.2 Economic Revitalization. Promote the development of vacant and underutilized parcels with higher intensity commercial and industrial land uses." The traffic study prepared for the Project (Appendix H-1) and accounted for the trucks, vans, and passenger cars anticipated to utilize the Project. As analyzed in the IS/MND, a total of 25 trucks per day (total of 50 truck trips) would access the project site, primarily overnight. Of these 25 trucks, 5 would access the Project during daytime hours, resulting in a reduction from current conditions. Even with all of the project-related vehicles, including trucks, vans and employee vehicles, during the peak hours (i.e. when the greatest number of cars are on the road in both the morning and afternoon), the project will add less than 1% to the existing traffic on Baseline, approximately 2% to the existing traffic on Benson, and less than 5% to Foothill. All of the project's trips would create less than a third of the traffic generated by retail store(s) the same size as the proposed project, and would generate far less truck traffic. Therefore, the proposed project, even including all the project vans, is a much lower traffic generator than other uses permitted by the zoning for this property. Additionally, the traffic study also overestimates the trips created by the project, as it is based on a 276,000 square foot building, and the building was downsized further to only 201,000 square feet since preparation of the traffic study. That's a nearly 28% reduction compared to the building analyzed in the traffic study, therefore the trip generation will likely be even less than what's presented in the traffic study.

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	this private air field). The project land owner chooses to lease for decades, not to sell 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.	While tax revenue to the City is outside the scope of the environmental analysis in the IS/MND, the project's proposed Development Agreement provides for an annual contribution for road maintenance, with the term of the contribution to be determined as part of the public review process. This annual contribution would be just part of the project's multi-million dollar financial commitment to the City included in the proposed Development Agreement, and in addition to the $2.5 million in City fees that the project will also be paying. The annual contribution is intended to replicate what the City could theoretically collect in sales tax from a retail project of similar size—however, at this dollar amount, the project's proposed annual contribution is the equivalent of a top 10 sales tax producer for the City. Additionally, while sales tax is variable (and mostly down over the last decade), and retail is generally declining, this would be guaranteed revenue for the City, and, again, would make the project one of the largest revenue sources for the City.
	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?	While tax revenue to the City is outside the scope of the environmental analysis in the IS/MND, the project's proposed Development Agreement provides for an annual contribution for road maintenance, with the term of the contribution to be determined as part of the public review process. This annual contribution would be just part of the project's multi-million dollar financial commitment to the City included in the proposed Development Agreement, and in addition to the $2.5 million in City fees that the project will also be paying. The annual contribution is intended to replicate what the City could theoretically collect in sales tax from a retail project of similar size—however, at this dollar amount, the project's proposed annual contribution is the equivalent of a top 10 sales tax producer for the City. Additionally, while sales tax is variable (and mostly down over the last decade), and retail is generally declining, this would be guaranteed revenue for the City, and, again, would make the project one of the largest revenue sources for the City.
	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	With regard to road maintenance, in addition to the standard project fees which includes nearly $500,000 for roads (i.e., this is the amount the City collects to pay for new road improvements and maintenance as a result of any new project and it is based on the size and use of the project), the project's Development Agreement includes an annual contribution for

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	summer so it can be operational by Christmas of 2020— should not be used as an excuse to circumvent public scrutiny.	road maintenance, with the term of the contribution to be determined as part of the public review process. This annual contribution is intended to replicate what the City could theoretically collect in sales tax from a retail project of similar size—however, at this dollar amount, the project's proposed annual contribution is the equivalent of a top 10 sales tax producer for the City. Additionally, while sales tax is variable (and mostly down over the last decade), and retail is generally declining, this would be guaranteed revenue for the City, and, again, would make the project one of the largest revenue sources for the City. The IS/MND thoroughly analyzed all thresholds required by the CEQA Guidelines and determined that the Project would result in no significant impacts after mitigation; impacts to air quality and greenhouse emissions would be mitigated to a less than significant level. While the IS/MND did not identify a significant GHG impact, the project has committed to further reducing GHG emissions through a number of new measures, including installation of solar panels on the building roof, EV chargers for 30 parking spaces, and EV-ready infrastructure for all trucks, all vans, and 50% of car parking spaces, among other measures. These new commitments are documented in the Supplemental GHG Report included as Attachment 2, and will be enforced through PDF-GHG-1 through PDF-GHG-5. As a result of this new solar commitment, the project building is projected to have **net-zero electricity consumption**. SCAQMD recommends that Health Risk Assessments (HRAs) be conducted for projects that would generate substantial sources of diesel particulate matter (DPM) (e.g., truck stops and warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units). The proposed project is a last-mile non-refrigerated warehouse that would only generate a maximum of 25 trucks per day. Furthermore, it should be noted that onsite equipment would be electric. The closest sensitive receptors would also be located more than 1,000 feet from the project site. No HRA is warranted as the Project is consistent with the recommendations regarding the siting of new sensitive land uses near potential sources of TAC emissions provided in the SCAQMD Guidance Document for Addressing Air Quality Issues in

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		General Plans and Local Planning. Specifically, the Project is not considered to be a substantial source of diesel particulate matter warranting an HRA, since daily truck trips to the Project Site would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units. Although an HRA is not required for the project, in response to the comment requesting one, an HRA was performed as described in accordance with SCAQMD and the California Office of Environmental Health Hazard Assessment (OEHHA) guidelines; refer to Attachment 3. As described in the HRA, cancer risk would be 1.92 in a million, which is below the SCAQMD threshold of 10 in one million and impacts would be less than significant. Additionally, non-carcinogenic hazards are calculated to be within acceptable limits. Therefore, impacts related to health risk from the Project would be less than significant. As described in the IS/MND and the Hydrology and Water Quality Management Plan prepared for the Project, water quality treatment for the Project is provided in accordance with all City mandated treatment requirements and will meet stormwater treatment requirements in the San Bernardino MS4 Permit. The IS/MND thoroughly analyzed all thresholds required by the CEQA Guidelines, including utilities and service systems, and determined that impacts to utilities and service systems would be less than significant. The majority of solid waste derived from the City is disposed of at the Mid-Valley Sanitary Landfill located approximately 15 miles east of the Project site. The Mid-Valley Sanitary Landfill has a maximum throughput of 7,500 tons per day and a maximum permitted capacity of approximately 101.3 million cubic yards with a remaining capacity of approximately 67.5 million cubic yards. The proposed Project complies with the land use and zoning designated in City's General Plan and would comply with federal, State, and local statutes and regulations related to solid waste.
Letter from M. Paster, dated January 21, 2020		
I-91	I'm an Upland resident and I strongly oppose the proposed Amazon warehouse. I work in Claremont, and the proposed warehouse would be	The IS/MND thoroughly analyzed all thresholds required by the CEQA Guidelines and determined that the Project would result in no significant

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	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.	impacts after mitigation; impacts to air quality and transportation would be mitigated to a less than significant level. In accordance with the CEQA Guidelines, the IS/MND evaluated the required environmental analysis of 20 environmental areas. Further, the IS/MND overestimates the Project's environmental impacts as it analyzed a 276,250 sf building; the Project has since been further reduced in size by 75,154 sf, or nearly 28% to the currently proposed 201,096 sf building. The IS/MND provides a comprehensive and thorough analysis of the environmental impacts of the Project as required by the CEQA Guidelines. Accordingly, the IS/MND includes more than 1,800 pages of environmental analysis, including 10 technical studies and evaluated all required thresholds required by CEQA and City requirements. Further, the Project's IS/MND has been subject to multiple peer reviews. A peer review was conducted of the GHG analysis included in the IS/MND by Ramboll, a leading engineering, design and consultancy company which helped develop the South Coast Air Quality Management District's (SCAQMD) preferred GHG emissions model, CalEEMod®, used to develop the GHG emissions inventory for the Project. This peer review memorandum, included as Attachment 1, confirmed that the IS/MND's GHG analysis was prepared using the most-recent, agency-recommended model consistent with SCAQMD guidance and industry standards for estimating GHG emissions and environmental impacts under CEQA. Ramboll's peer review concluded that the IS/MND correctly determined that the Project's GHG emissions would be less than significant. Additionally, while the IS/MND did not identify a significant GHG impact, the project has committed to further reducing GHG emissions through a number of new measures, including installation of solar panels on the building roof, EV chargers for 30 parking spaces, and EV-ready infrastructure for all trucks, all vans, and 50% of car parking spaces, among other measures. As a result of this new solar commitment, the project building is projected to have net-zero electricity consumption. These additional sustainability commitments are described in the Supplemental GHG Analysis, included as Attachment 2. As calculated therein, the project's GHG emissions would continue to be below the significance

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		threshold identified in the MND of 10,000 MT CO2e per year, and would also now be below 3,000 metric tons of CO2e per year even if that threshold were applicable. This supplemental GHG analysis, including these additional sustainability commitments, was also peer reviewed and confirmed by Ramboll, as noted in their memo. The traffic analysis prepared by Translutions included in the Draft IS/MND was peer reviewed by both Gibson Transportation and TKE Engineering. Therefore, the traffic study included in the Draft IS/MND is the product of analysis and comments from three independent traffic engineering firms. Further, Rocks Biological Consulting conducted an additional site visit and provided an independent, third-party review of the findings of the habitat assessment. The Supplemental Project Field Survey provided by Rocks Biological Consulting and included as Attachment 5, concurs that there is no potential for federally or state-listed as threatened or endangered plant or wildlife species to occur on the project site. Finally, the Draft IS/MND as a whole was peer reviewed by the City's own Planning staff (with accumulated decades of CEQA experience), Engineering staff, and City Attorney. This review process led to changes and refinements to the IS/MND before its publication for public review.
Letter from N. Walton, dated January 21, 2020		
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.	Detailed technical studies (including a habitat assessment) analyzing the potential environmental impacts of the proposed Project determined that all impacts would be less than significant either before or after mitigation, therefore an IS/MND is the appropriate environmental document consistent with CEQA, and an EIR is not required. Nonetheless, all of the technical studies included in the Project's IS/MND are the exact same technical studies that would have been included in an EIR. Each study's level of detail and thorough, comprehensive analysis is the same between this Project's IS/MND and an EIR. The studies show that all potential impacts are reduced to less than significant. Under CEQA, the only additional analysis that an EIR requires is an alternatives analysis to consider whether there are any alternatives that

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	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 the 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. 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**	would reduce impacts that cannot be mitigated to less than significant. Here, because there are no significant impacts, CEQA does not require an alternatives analysis to try to reduce impacts. Prior to the site evaluation, the biologist reviewed appropriate federal and state sensitive species lists (including United States Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW) special status species lists) and California Natural Diversity Database (CNDDB) to determine potential for sensitive species to occur on the Project site. The lists that were consulted are routinely used as tools to help guide biologists in their evaluation of a site; however, the potential for sensitive species to occur on the site is determined based on site conditions such as vegetation, soils, human disturbance and other factors observed in the field. A total of three field visits were made to the Project site during various seasons over the past year by two different biological consulting firms. The first was conducted on March 29, 2018 by ELMT Consulting. This field visit determined that, based on habitat requirements for specific special-status plant species and the availability and quality of habitats needed by each species, the Project site does not provide suitable habitat for any of the special-status plant species known to occur in the area and are presumed to be absent from the Project site. The second site visit that occurred in August 2019 was adequate to assess the potential for sensitive species to occur on the Project site. Although the site visit occurred during a time when many plants are not present, the biologist determined that site conditions were not suitable for any special-status plant species to occur during any time of the year. As discussed in the IS/MND and the November 2019 Habitat Assessment prepared for the Project, the site is heavily disturbed due to a variety of human-related disturbances such as sand and gravel processing, illegal dumping and homeless encampments. As such, the site does not provide suitable habitat for any Federal or State threatened and endangered species. Finally, a third site visit was conducted on January 22, 2020 by a biologist from Rocks Biological Consulting, a second and independent firm from ELMT Consulting (which prepared the IS/MND's Habitat Assessment).

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	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 propagated from seeds harvested from on-site plants. The nesting bird season has recently been extended by the California Department of Fish and Wildlife 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!	Rocks Biological Consulting prepared the Supplemental Project Field Survey Memorandum (included as Attachment 5) which concurred that there is no potential for federally or state-listed as threatened or endangered plant or wildlife species to occur on the project site. The commenter states that the plant species, *Baccharis sarothoides* was not included in the biological report and indicates that it can be found in wetland habitats. *Baccharis sarothoides* is a very common plant species that does not have any Federal or State special status. It is also not included on the California Native Plant Society listing. There were no drainages (potential waters of the U.S or State) or wetlands observed on the Project site. The Project site does contain suitable habitat for burrowing owl and therefore, a mitigation measure has been added to the Final IS/MND to conduct pre-construction surveys for burrowing owl before the start of grading activities to confirm the absence of burrowing owl from the site. A landscape plan identifying all of the native plants and 1,000 trees to be planted on site was provided with the Project applications and has been added to the Final IS/MND as Attachment 7. There is no requirement that seeds be from the site. The commenter states the nesting bird season has been recently changed by CDFW to February 1 to September 30th. There are no published nesting seasons for migratory birds by CDFW because dates are typically determined based on the species that have the potential to occur on the site. However, the applicant has agreed to modify Mitigation Measure BIO-1 in the IS/MND to require a pre-construction nesting bird survey, if vegetation clearing and ground disturbing activities occur during the nesting season to be defined as February 1 to September 30th.
Letter from R. Ortiz, dated January 21, 2020		

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I-93	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 Planning Commission makes a final decision.	The comment is noted. The comment does not raise any issues or address the adequacy of the IS/MND, and thus no further response is needed.
Letter from S. Santana, dated January 21, 2020		
I-94	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.	The IS/MND thoroughly analyzed all thresholds required by the CEQA Guidelines and determined that the Project would result in no significant impacts after mitigation; impacts to air quality and transportation would be mitigated to a less than significant level. In accordance with the CEQA Guidelines, the IS/MND evaluated the required environmental analysis of 20 environmental areas. Further, the IS/MND overestimates the Project's environmental impacts as it analyzed a 276,250 sf building; the Project has since been further reduced in size by 75,154 sf, or nearly 28% to the currently proposed 201,096 sf building. The IS/MND provides a comprehensive and thorough analysis of the environmental impacts of the Project as required by the CEQA Guidelines. Accordingly, the IS/MND includes more than 1,800 pages of environmental analysis, including 10 technical studies and evaluated all required thresholds required by CEQA and City requirements. The South Coast Air Quality Management District (SCAQMD) requires Health Risk Assessments (HRAs) for projects that are within 1,000 feet of sensitive receptors and have more than 100 trucks per day. As analyzed in the IS/MND, the Project would have 25 trucks per day, which equates to 50 truck trips per day and remains under the 100 truck per day threshold noted above. Further, the truck court on the Project site would be approximately 2,000 feet (i.e., more than 1,000 feet) from the closest sensitive receptors. Therefore, impacts would be less than significant and an HRA is not required. Nonetheless, in response to comments, a mobile-source HRA has been prepared and is included in Attachment 3. As analyzed therein, the HRA shows that the highest calculated risk resulting from the Project is 1.92 per

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		million residents, which is far below the South Coast Air Quality Management District's (SCAQMD) adopted significance threshold of 10 per million residents. This is because 98 percent of the Project's vehicle trips would be automobiles or vans and not heavy-duty diesel trucks, which are the primary generators of the diesel particulate matter analyzed in HRAs. The SCAQMD's significance threshold is health-protective of residents and other sensitive uses and is the adopted threshold used by lead agencies for HRAs. The Project is being reviewed in accordance with the existing City development review process. The Planning Commission will be a recommending body on the Project's entitlements (including the Development Agreement, site plan review, design review, lot line adjustment, and airport compatibility findings) and adoption of the proposed IS/MND. The City Council will be the ultimate decisionmaker on the Project's entitlements and adoption of the IS/MND. As the commenter notes, a broadcast of the City Council Joint Workshop held January 9, 2020, is available on the City's website. As a standard practice, the recordings are provided for periods of time in which the meeting is in session.
Letter from T. Fountain, dated January 22, 2020		
I-95	I would like to go on record as being against Amazon or any other distribution or warehouse facilities in Upland.	The comment is noted. The comment does not raise any issues or address the adequacy of the IS/MND, and thus no further response is needed. A tenant has not yet been identified for the Project, and the scope of the City's Municipal Code does not provide authority for the City to determine or review the choice of tenant that may occupy the building. *Friends of Davis v. City of Davis* (2000) 83 Cal.App.4th 1004, 1013-14.
Letter from B. James, dated January 21, 2020		
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	Comment in support of the Project is noted. While tax revenue to the City is outside the scope of the environmental analysis in the IS/MND, the project's proposed Development Agreement provides for an annual contribution for road maintenance, with the term

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	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.	of the contribution to be determined as part of the public review process. This annual contribution would be just part of the project's multi-million dollar financial commitment to the City included in the proposed Development Agreement, and in addition to the $2.5 million in City fees that the project will also be paying. The annual contribution is intended to replicate what the City could theoretically collect in sales tax from a retail project of similar size—however, at this dollar amount, the project's proposed annual contribution is the equivalent of a top 10 sales tax producer for the City. Additionally, while sales tax is variable (and mostly down over the last decade), and retail is generally declining, this would be guaranteed revenue for the City, and, again, would make the project one of the largest revenue sources for the City.
Letter from C. Kim, dated January 20, 2020		
I-97	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.	The comment is noted. The comment does not raise any issues or address the adequacy of the IS/MND, and thus no further response is needed.
Letter from M. McGuinness, dated January 20, 2020		
I-98	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	The IS/MND prepared for the Project thoroughly analyzes all thresholds required by the CEQA Guidelines. In accordance with the CEQA Guidelines, the IS/MND evaluated the required environmental analysis of 20 environmental areas. Further, the IS/MND overestimates the Project's environmental impacts as it analyzed a 276,250 sf building; the Project has since been further reduced in size by 75,154 sf, or nearly 28% to the currently proposed 201,096 sf building. The IS/MND provides a comprehensive and thorough analysis of the environmental impacts of the Project as required by the CEQA Guidelines. Accordingly, the IS/MND includes more than 1,800 pages of environmental analysis, including 10 technical studies and evaluated all required thresholds required by CEQA and City requirements. Detailed technical studies analyzing the potential environmental impacts

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	without public scrutiny? 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? 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	of the proposed Project determined that all impacts would be less than significant either before or after mitigation, therefore an IS/MND is the appropriate environmental document consistent with CEQA, and an EIR is not required. Nonetheless, all of the technical studies included in the Project's IS/MND are the exact same technical studies that would have been included in an EIR. Each study's level of detail and thorough, comprehensive analysis is the same between this Project's IS/MND and an EIR. The only technical analysis that would have been in an EIR, that is not in an IS/MND, is an evaluation of alternatives to the Project. Therefore, there is no project-specific analysis that is missing from this IS/MND which would have been included in an EIR for the Project. Any future operation on the Project site would be subject to all mitigation measures, conditions of approval and commitments contained in the Development Agreement that are approved with the proposed Project. Any future use on the Project site would be required to comply with the uses approved for the site. The proposed project provides the "last mile" of the online customer order delivery process. Packages will be shipped to this location from much larger fulfillment and sortation centers, sorted and stored based on address and delivery timing, loaded into small delivery vans, and then delivered to nearby residents. Van drivers will travel to the project site with their personal vehicles (or public transit), park their personal vehicles on site, and then pick up the loaded vans for deliveries. Vans are then returned to their parking location on site after completion of the deliveries, and drivers leave the project site in their personal vehicles or public transit as applicable. Van deliveries will occur at daytime and evening hours, but home deliveries will not generally occur at night. However, a maximum of only 5 trucks will travel to/from the site during daytime hours, with a total of only 25 daily. The last mile facility is a 24-hour operation, however the nighttime operations will consist of unloading the truck deliveries, sorting the packages and goods and then storing the packages and goods (all inside the building) and will not include van deliveries. While understanding the concern regarding the number of van parking

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	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.	spaces proposed on site, van parking spaces are not an indicator of actual trip generation. Rather, the trip generation rate is appropriately based on building square footage because building square footage represents the total amount of goods/delivery capacity of a building. The number of van deliveries is capped by the size, i.e. capacity, of the building to store goods for delivery. This is why the ITE trip generation rate is based on building square footage, and not van parking spaces. Further, in this case, total van deliveries (and, thus, trip generation) is limited due to the daily truck delivery cap. Nevertheless, the number of van parking spaces can be an indicator of factors unrelated to actual van delivery needs, such as lease terms between developer and tenant. For instance, since a tenant frequently pays a developer based on total land area developed, additional developed area (including parking spaces) may be a function of lease price rather than parking demand. The traffic study used the ITE Trip Generation rate for "High-Cube Parcel Hub Warehouse", which is a package delivery type land use, consistent with the proposed use. A High Cube Parcel Hub warehouse reflects delivery/shipping facilities like UPS and FedEx which are engaged in package delivery directly to customers. This is the closest approximation to a Last Mile warehouse like the one proposed by the project. This ITE rate included trips generated by all Project-related vehicles, including trucks, vans, and employee cars traveling to and from the site. The traffic study also looked at traffic generated during the peak hours of the day, meaning the hour in the morning and hour in the afternoon when the greatest number of cars are on the road. The traffic study was completed consistent with all adopted methodology and guidelines. With regard to road maintenance, in addition to the standard project fees which includes nearly $500,000 for roads (i.e., this is the amount the City collects to pay for new road improvements and maintenance as a result of any new project and it is based on the size and use of the project), the project's Development Agreement includes an annual contribution for road maintenance, with the term of the contribution to be determined as part of the public review process. This annual contribution is intended to

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		replicate what the City could theoretically collect in sales tax from a retail project of similar size—however, at this dollar amount, the project's proposed annual contribution is the equivalent of a top 10 sales tax producer for the City. Additionally, while sales tax is variable (and mostly down over the last decade), and retail is generally declining, this would be guaranteed revenue for the City, and, again, would make the project one of the largest revenue sources for the City. Per the CEQA Guidelines, the project analysis analyzes 20 resource categories. Project fees are not required to be evaluated under the CEQA Guidelines and are therefore out of the scope of the IS/MND analysis. However, the IS/MND evaluates the potential impacts to public facilities and found the Project to have a less than significant impact. Furthermore, the City requires that all new development pay Development Impact Fees in order to offset impacts associated with increasing the City's demand for public services.
Letter from M. Thornburg, dated January 21, 2020		
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 prose 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	The proposed project is a Last Mile warehouse that is the last step in the warehouse supply chain before a package reaches a customer. A High Cube Parcel Hub warehouse reflects delivery/shipping facilities like UPS and FedEx which are engaged in package delivery directly to customers. This is the closest approximation to a Last Mile warehouse like the one proposed by the project. The Project is a warehouse facility consistent with Section 17.51.010 of the City's Municipal Code which Code defines warehousing as the provision of facilities used primarily for the storage of commercial goods, including documents. The Project is located within the C/I-MU zone, and Section 17.05.020 of the City's Municipal Code identifies warehousing as a permitted use within the C/I-MU zone. The General Plan is consistent with the Municipal Code and identifies that warehousing is an allowable use within the C/I-MU zone. The project is also consistent the General Plan's description of the C/I-MU zone as follows:

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	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.	"The Commercial/Industrial Mixed-Use designation is **designed to accommodate a variety of industrial** and regional retail uses and to support commercial activities to satisfy a range of shopping needs for residents of the community. **It is also intended to encourage development of business in the City and to maximize the potential for job generation.** Uses supported under this category include commercial and industrial. **Typical industrial uses could include limited general industrial, manufacturing, assembly, warehousing, multi-tenant industrial, research and development, and airport–related uses**. Typical commercial uses include retail commercial and durable sales goods, tourist-related commercial, entertainment, recreational uses, administrative and professional offices, commercial activities, business support services, food and institutional uses, as well as residential, subject to a reasonable minimum increment of land area as well as a special use permit process." (emphasis added) The project is also consistent with the following General Plan policy of the City: "Policy LU-3.2 Economic Revitalization. Promote the development of vacant and underutilized parcels with higher intensity commercial and industrial land uses." The project does not in any way fit the definition of a truck terminal, and is correctly categorized as a warehouse. The US government defines types of businesses by Standard Industrial Classification (SIC). The proposed project fits squarely within Industry Group 422 (Public Warehousing and Storage) and Industry Group SIC Code 4225 – General Warehousing and Storage. The project does not fit within the SIC Industry Group 423 (Terminal and Joint Terminal Maintenance) or Industry Group 421, both of which include terminals operated by motor freight transportation companies. In addition, the ULI publication "Guide to Classifying Industrial Property" available online here: http://courses.washington.edu/cee320ag/warehousing/WarehouseClassification.pdf describes truck terminals as follows:

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		"***Truck Terminals do not warehouse goods. Their sole function is to transfer goods from one truck to another***. Because of this function Truck Terminals are long and narrow in design. Because Truck Terminals transfer rather than store cargo, the facilities also have low ceiling heights. ***Most ceiling heights range from 12 to 16 feet, which is below the height of any facilities within the Warehouse Distribution category***." (emphasis added) The proposed project does not fit this definition of a truck terminal. The proposed project's warehouse will be used to store and then distribute goods directly to customers on vans. No goods will be transferred from one truck to another truck at the project's warehouse, for deliver to the next warehouse in the supply chain, as is the case for a truck terminal. Further, the proposed project's ceiling height is 36 feet, well above the 12 to 16 foot range that is typical for a truck terminal. The project's 36 foot ceiling height is very typical of warehouses that are required to store goods on site in order to optimize storage capacity. The low, 12-16 foot ceiling height works for truck terminals because goods are immediately transferred from one truck to another, without storage. Therefore, the proposed project's warehouse fits neither the operational nor the physical characteristics of a truck terminal. The project has not been pre-approved by the City of Upland, and no tenant has been identified or has been leased for this Project. The Project, its entitlements, and the IS/MND will require approval from the City Council in order to proceed. A tenant has not yet been identified for the Project, and the scope of the City's Municipal Code does not provide authority for the City to determine or review the choice of tenant that may occupy the building. *Friends of Davis v. City of Davis* (2000) 83 Cal.App.4th 1004, 1013-14. While the tenant has not been determined at this time, any future operation on the Project site would be subject to the same mitigation measures, conditions of approval and provisions contained in the Development Agreement as the proposed Project. Any future use on the Project site would be required to comply with the uses approved for the site. Accordingly, however, CEQA Guidelines provide that analysis is based on the operational and construction related environmental impacts of a project and does not

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		consider the owner or prospective tenant in that analysis. The IS/MND prepared for the Project thoroughly analyzes all thresholds required by the CEQA Guidelines. In accordance with the CEQA Guidelines, the IS/MND evaluated the required environmental analysis of 20 environmental areas. Further, the IS/MND overestimates the Project's environmental impacts as it analyzed a 276,250 sf building; the Project has since been further reduced in size by 75,154 sf, or nearly 28% to the currently proposed 201,096 sf building. The IS/MND provides a comprehensive and thorough analysis of the environmental impacts of the Project as required by the CEQA Guidelines. Accordingly, the IS/MND includes more than 1,800 pages of environmental analysis, including 10 technical studies and evaluated all required thresholds required by CEQA and City requirements. Detailed technical studies analyzing the potential environmental impacts of the proposed Project determined that all impacts would be less than significant either before or after mitigation, therefore an IS/MND is the appropriate environmental document consistent with CEQA, and an EIR is not required. Nonetheless, all of the technical studies included in the Project's IS/MND are the exact same technical studies that would have been included in an EIR. Each study's level of detail and thorough, comprehensive analysis is the same between this Project's IS/MND and an EIR. The only technical analysis that would have been in an EIR, that is not in an IS/MND, is an evaluation of alternatives to the Project. Therefore, there is no project-specific analysis that is missing from this IS/MND which would have been included in an EIR for the Project. In no event, regardless of whether an IS/MND or EIR is prepared, would the City of Upland be liable for any damages. As a standard condition of approval, the City requires that the Applicant indemnify the City and be responsible for all costs associated with preparation of the environmental document, costs associated with any legal challenge of the environmental document, and any associated damages. While economic impacts are outside the scope of the IS/MND, a Development Agreement is part of the project's entitlements which

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		proposes millions of dollars in contributions for the City, in addition to the City's standard development impact fees. These contributions would go towards road maintenance, police, parks, education, local businesses and other civic improvements. Additionally, Bridge's investment in the property and other off-site improvements could expand the City's tax revenue base in the future. The project will create 300 permanent employees in the building who will want to eat and buy goods and services at neighboring stores. Not only will the project be adding 1,000 new trees and nearly 11 acres of landscaping on the property, but the project will also be paying for and installing new landscaping, curbs, gutters and sidewalks over approximately 1,000 linear feet of Foothill Boulevard as detailed in the Development Agreement. These improvements will enhance the aesthetics and attractiveness of the street and could make the currently vacant lots on Foothill more attractive to development, including retail. The project could serve as an economic catalyst for the Foothill Blvd corridor that will have long-lasting tax revenue benefits for the City.
Letter from C. and L. Beggs, dated January 22, 2020		
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	Comment in support of the Project is noted.

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	board has done a great job of bringing people back to this historic district.	
Letter from C. Nichols, dated January 21, 2020		
I-101	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.	A tenant has not yet been identified for the Project, and the scope of the City's Municipal Code does not provide authority for the City to determine or review the choice of tenant that may occupy the building. *Friends of Davis v. City of Davis* (2000) 83 Cal.App.4th 1004, 1013-14. The Traffic Impact Assessment (TIA) prepared for the Project (Appendix H-1) and accounted for the trucks, vans, and passenger cars anticipated to utilize the Project. As analyzed in the IS/MND, a total of 25 trucks per day (total of 50 truck trips) would access the project site, primarily overnight. Of these 25 trucks, 5 would access the Project during daytime hours, resulting in a reduction from current conditions. Even with all of the project-related vehicles, including trucks, vans and employee vehicles, during the peak hours (i.e. when the greatest number of cars are on the road in both the morning and afternoon), the project will add less than 1% to the existing traffic on Baseline, approximately 2% to the existing traffic on Benson, and less than 5% to Foothill. All of the project's trips would create less than a third of the traffic generated by retail store(s) the same size as the proposed project, and would generate far less truck traffic. Therefore, the proposed project, even including all the project vans, is a much lower traffic generator than other uses permitted by the zoning for this property. Additionally, the traffic study also overestimates the trips created by the project, as it is based on a 276,000 square foot building, and the building was downsized further to only 201,000 square feet since preparation of the traffic study. That's a nearly 28% reduction compared to the building analyzed in the traffic study, therefore the trip generation will likely be even less than what's presented in the traffic study.
Letter from D. Moore, dated January 21, 2020		

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I-102	I am in favor of this project. I am currently serving as President of the Historic Downtown Upland Board and have also been a resident of Upland for over 30 years.	Comment in support of the Project is noted.
Letter from E. Carrillo, dated January 21, 2020		
I-103	This email is to express my support of the Bridge Development Project.	Comment in support of the Project is noted.
Letter from H. van Kooten, dated January 21, 2020		
I-104	I support the Bridge Development.	Comment in support of the Project is noted.
Letter from E. Gavin, dated January 21, 2020		
I-105	I'm definitely in support of the Bridge project. I prefer a business instead of a pile of dirt	Comment in support of the Project is noted.
Letter from L. Sicking-Dieter, dated January 21, 2020		
I-106	I am a 3 I-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, was 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 staffs 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,	Detailed technical studies analyzing the potential environmental impacts of the proposed Project determined that all impacts would be less than significant either before or after mitigation, therefore an IS/MND is the appropriate environmental document consistent with CEQA, and an EIR is not warranted. Nonetheless, all of the technical studies included in the project's IS/MND are the exact same technical studies that would have been included in an EIR. Each study's level of detail and thorough, comprehensive analysis is the same between this project's IS/MND and an EIR. The only technical analysis that would have been in an EIR, that is not in an IS/MND, is an evaluation of alternative projects on the site. Therefore, there is no project-specific analysis that is missing from this IS/MND which would have been included in an EIR for the project. The City Council will be the ultimate decisionmaker on the Project's entitlements and adoption (or not) of the IS/MND.

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	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/oi 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 wealth 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 were. 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	The IS/MND prepared for the Project thoroughly analyzes all thresholds required by the CEQA Guidelines. In accordance with the CEQA Guidelines, the IS/MND evaluated the required environmental analysis of 20 environmental areas. Further, the IS/MND overestimates the Project's environmental impacts as it analyzed a 276,250 sf building; the Project has since been further reduced in size by 75,154 sf, or 35% to the currently proposed 201,096 sf building. The IS/MND provides a comprehensive and thorough analysis of the environmental impacts of the Project as required by the CEQA Guidelines. Accordingly, the IS/MND includes more than 1,800 pages of environmental analysis, including 10 technical studies and evaluated all required thresholds required by CEQA and City requirements. The South Coast Air Quality Management District (SCAQMD) requires Health Risk Assessments (HRAs) for projects that are within 1,000 feet of sensitive receptors and have more than 100 trucks per day. As analyzed in the IS/MND, the Project would have 25 trucks per day, which equates to 50 truck trips per day and remains under the 100 truck per day threshold noted above. Further, the truck court on the Project site would be approximately 2,000 feet (i.e., more than 1,000 feet) from the closest sensitive receptors. Therefore, impacts would be less than significant and an HRA is not required. Nonetheless, in response to comments, a mobile-source HRA has been prepared and is included in Attachment 3. As analyzed therein, the HRA shows that the highest calculated risk resulting from the Project is 1.92 per million residents, which is far below the South Coast Air Quality Management District's (SCAQMD) adopted significance threshold of 10 per million residents. This is because 98 percent of the Project's vehicle trips would be automobiles or vans and not heavy-duty diesel trucks, which are the primary generators of the diesel particulate matter analyzed in HRAs. The SCAQMD's significance threshold is health-protective of residents and other sensitive uses and is the adopted threshold used by lead agencies for HRAs. The project's IS/MND has been reviewed by the SCAQMD which did not request or suggest that a health risk assessment be conducted. The

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	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 was 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	IS/MND was also sent to the California Air Resources Board and the California Department of Transportation, which did not provide any comments on the project. Further, the Project's IS/MND has been subject to multiple peer reviews. A peer review was conducted of the GHG analysis included in the IS/MND by Ramboll, a leading engineering, design and consultancy company which helped develop the South Coast Air Quality Management District's (SCAQMD) preferred GHG emissions model, CalEEMod®, used to develop the GHG emissions inventory for the Project. This peer review memorandum, included as Attachment 1, confirmed that the IS/MND's GHG analysis was prepared using the most-recent, agency-recommended model consistent with SCAQMD guidance and industry standards for estimating GHG emissions and environmental impacts under CEQA. Ramboll's peer review concluded that the IS/MND correctly determined that the Project's GHG emissions would be less than significant. Additionally, while the IS/MND did not identify a significant GHG impact, the project has committed to further reducing GHG emissions through a number of new measures, including installation of solar panels on the building roof, EV chargers for 30 parking spaces, and EV-ready infrastructure for all trucks, all vans, and 50% of car parking spaces, among other measures. As a result of this new solar commitment, the project building is projected to have net-zero electricity consumption. These additional sustainability commitments are described in the Supplemental GHG Analysis, included as Attachment 2. As calculated therein, the project's GHG emissions would continue to be below the significance threshold identified in the MND of 10,000 MT CO2e per year, and would also now be below 3,000 metric tons of CO2e per year even if that threshold were applicable. This supplemental GHG analysis, including these additional sustainability commitments, was also peer reviewed and confirmed by Ramboll, as noted in their memo. The traffic analysis prepared by Translutions included in the Draft IS/MND was peer reviewed by both Gibson Transportation and TKE Engineering. Therefore the traffic study included in the Draft IS/MND is the product of analysis and comments from three independent traffic engineering firms.

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	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.	Further, Rocks Biological Consulting, a second and independent firm from ELMT Consulting (which prepared the IS/MND's Habitat Assessment), conducted an additional site visit and provided an independent, third-party review of the findings of the habitat assessment. The Supplemental Project Field Survey provided by Rocks Biological Consulting and included as Attachment 5, concurs that there is no potential for federally or state-listed as threatened or endangered plant or wildlife species to occur on the project site. Finally, the Draft IS/MND as a whole was peer reviewed by the City's own Planning staff (with accumulated decades of CEQA experience), Engineering staff, and City Attorney. This review process led to changes and refinements to the IS/MND before its publication for public review. The existing condition hydrology map and calculations are based on aerial topography from March of 2018. The topography for the overall project site indicates approximately 40' of positive drainage from north to south towards Foothill Boulevard. The topography also indicates several stockpiles of materials generally located in the northwesterly portion of the project site. The existing condition Rational Method calculations contained in the report are from May of 2018. In general, the easterly portion of the site was modeled as "open brush, poor cover" while the westerly portions were modeled as "barren" due to the grading, stockpiles and ongoing operations in this area. The hydrology report references the stockpiles and states that runoff has the ability to flow around the stockpiles and maintain existing drainage patterns towards Foothill Boulevard. It appears that there has been ongoing activities at the northwesterly portion of the site since the aerial topography. Recent Google satellite images and field visits indicated that some stockpiles have been removed and/or relocated to other areas within this portion of the project site. However, it appears that this actively is exclusive to the same area as that from May 2018 topography. The removal or addition of stockpiles in this area does not affect the overall land usage, the general paths of travel or the existing drainage patterns. The easterly and southerly portions of the

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	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 blinding 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	site remain unchanged. The recent activity has not changed the overall land usage, area of disturbance, points of discharge or overall gradient of the project site and therefore has no impact on the existing condition hydrology calculations. The hydrology calculations (Appendix E) previously used a very slightly smaller project site area (48 acres) based on an earlier alignment of project driveways. The hydrology report has been updated to include the full 50.25 acre site area and is included as Attachment 6 of the responses to comments. The change in acreage does not alter any of the conclusions in the technical analysis. The programs used in the hydrology report are based on the formulas in the San Bernardino County Hydrology Manual. The Manual was last issued in 1986 and has not been revised since, therefore the 1999 and 2016 program versions use the same formula, math and calculations. Both the 1999 and 2016 programs produce the same calculation results, therefore the calculations in the hydrology report are accurate and use the latest formulas. Nonetheless, all calculations have been run through the 2016 program and are included in the updated hydrology report, included as Attachment 6 of responses to comments. All required data and references are in compliance with the San Bernardino Hydrology Manual are included in the drainage report. See Water Quality Management Plan (WQMP), a separate report, for detailed calculations of stormwater treatment for the first rain event (aka. first flush). The hydrology report included all raw data and reference information required and has been updated using the same version software (version 23). Revision dates are shown on the title page. While economic impacts are outside the scope of the IS/MND, a Development Agreement is part of the project's entitlements which proposes millions of dollars in contributions for the City, in addition to the City's standard development impact fees. These contributions would go towards road maintenance, police, parks, education, local businesses and other civic improvements. The funding details proposed in the

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	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. 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.	Development Agreement will be made public as part of Planning's the staff report on the project prior to the Planning Commission Hearing. The City Council will be the ultimate decisionmaker on the Development Agreement. With regard to road maintenance, in addition to the standard project fees which includes nearly $500,000 for roads (i.e., this is the amount the City collects to pay for new road improvements and maintenance as a result of any new project and it is based on the size and use of the project), the project's Development Agreement includes an annual contribution for road maintenance, with the term of the contribution to be determined as part of the public review process. This annual contribution is intended to replicate what the City could theoretically collect in sales tax from a retail project of similar size—however, at this dollar amount, the project's proposed annual contribution is the equivalent of a top 10 sales tax producer for the City. Additionally, while sales tax is variable (and mostly down over the last decade), and retail is generally declining, this would be guaranteed revenue for the City, and, again, would make the project one of the largest revenue sources for the City. A landscape plan identifying all of the native plants and 1,000 trees to be planted on site was provided with the project applications and has been added to the Final IS/MND as Attachment 7. Any future operation on the Project site would be subject to all mitigation measures, conditions of approval and commitments contained in the Development Agreement that are approved with the proposed Project including any maintenance agreements. The referenced artists rendition was created as a tool for public discussion and was not included in the IS/MND and is outside the scope of the CEQA Guidelines. A tenant has not yet been identified for the Project, and the scope of the City's Municipal Code does not provide authority for the City to determine or review the choice of tenant that may occupy the building. *Friends of Davis v. City of Davis* (2000) 83 Cal.App.4th 1004, 1013-14. While the tenant has not been determined at this time, any future

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		operation on the Project site would be subject to the same mitigation measures, conditions of approval and provisions contained in the Development Agreement as the proposed Project. Any future use on the Project site would be required to comply with the uses approved for the site. Accordingly, however, CEQA Guidelines provide that analysis is based on the operational and construction related environmental impacts of a project and does not consider the owner or prospective tenant in that analysis. The Project does not propose connectivity of any kind, including distribution, with the adjacent Cable Airport. All deliveries to the Project would be from the 25 trucks identified in the IS/MND The proposed Project does not include drone activity, which would be incompatible with the adjacent airport use. Any future operations inconsistent with the Project analyzed in this IS/MND would be subject to separate environmental analysis and any future use on the Project site would be required to comply with the uses approved for the site. The IS/MND thoroughly analyzed all thresholds required by the CEQA Guidelines and determined that the Project would result in no significant impacts after mitigation. Impacts to hydrology were evaluated in accordance with the CEQA Guidelines and threshold VI.10 (c) found that the project would comply with County Flood Control requirements.
Letter received 73 times		
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	Detailed technical studies analyzing the potential environmental impacts of the proposed Project determined that all impacts would be less than significant either before or after mitigation, therefore an IS/MND is the appropriate environmental document consistent with CEQA, and an EIR is not required. Nonetheless, all of the technical studies included in the Project's IS/MND are the exact same technical studies that would have been included in an EIR. Each study's level of detail and thorough, comprehensive analysis is the same between this Project's IS/MND and an EIR. The only technical analysis that would have been in an EIR, that is not in an IS/MND, is an evaluation of alternatives to the Project. Therefore,

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	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 Kimley-Horn & 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.	there is no project-specific analysis that is missing from this IS/MND which would have been included in an EIR for the Project. The IS/MND prepared for the Project thoroughly analyzes all thresholds required by the CEQA Guidelines. In accordance with the CEQA Guidelines, the IS/MND evaluated the required environmental analysis of 20 environmental areas. Further, the IS/MND overestimates the Project's environmental impacts as it analyzed a 276,250 sf building; the Project has since been further reduced in size by 75,154 sf, or nearly 28% to the currently proposed 201,096 sf building. The IS/MND provides a comprehensive and thorough analysis of the environmental impacts of the Project as required by the CEQA Guidelines. Accordingly, the IS/MND includes more than 1,800 pages of environmental analysis, including 10 technical studies and evaluated all required thresholds required by CEQA and City requirements. Van parking spaces are not an indicator of actual trip generation. Rather, the trip generation rate is appropriately based on building square footage because building square footage represents the total amount of goods/delivery capacity of a building. The number of van deliveries is capped by the size, i.e. capacity, of the building to store goods for delivery. This is why the ITE trip generation rate is based on building square footage, and not van parking spaces. Further, in this case, total van deliveries (and, thus, trip generation) is limited due to the daily truck delivery cap. Nevertheless, the number of van parking spaces can be an indicator of factors unrelated to actual van delivery needs, such as lease terms between developer and tenant. For instance, since a tenant frequently pays a developer based on total land area developed, additional developed area (including parking spaces) may be a function of lease price rather than parking demand. The Project is a warehouse facility consistent with Section 17.51.010 of the City's Municipal Code which defines warehousing as the provision of facilities used primarily for the storage of commercial goods, including documents. The Project is located within the C/I-MU zone, and Section

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	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	17.05.020 of the City's Municipal Code identifies warehousing as a permitted use within the C/I-MU zone. The General Plan is consistent with the Municipal Code and identifies that warehousing is an allowable use within the C/I-MU zone. The project is also consistent the General Plan's description of the C/I-MU zone as follows: "The Commercial/Industrial Mixed-Use designation is **designed to accommodate a variety of industrial** and regional retail uses and to support commercial activities to satisfy a range of shopping needs for residents of the community. **It is also intended to encourage development of business in the City and to maximize the potential for job generation.** Uses supported under this category include commercial and industrial. **Typical industrial uses could include limited general industrial, manufacturing, assembly, warehousing, multi-tenant industrial, research and development, and airport–related uses**. Typical commercial uses include retail commercial and durable sales goods, tourist-related commercial, entertainment, recreational uses, administrative and professional offices, commercial activities, business support services, food and institutional uses, as well as residential, subject to a reasonable minimum increment of land area as well as a special use permit process." (emphasis added) The project is also consistent with the following General Plan policy of the City: "Policy LU-3.2 Economic Revitalization. Promote the development of vacant and underutilized parcels with higher intensity commercial and industrial land uses." The IS/MND thoroughly analyzed all thresholds required by the CEQA Guidelines and determined that the Project would result in no significant impacts after mitigation; impacts to aesthetics were found to be less than significant. As discussed in the IS/MND aesthetics threshold, there are no State or County designated scenic highways proximate to the Project site. Although Foothill Boulevard is not designated as a state scenic highway, the City's Scenic Highways element had previously identified Foothill Boulevard as a corridor of scenic and historic interest. The City's General Plan no longer includes a Scenic Highways element, but guides

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	quality of life, our health and our property values, by rejecting this project using the basis outlined above.	development along corridors using focus areas, including a focus area for Euclid Avenue, which is within the Scenic Corridor overlay zone. The intersection of Foothill Boulevard and Euclid Avenue, which is within the Scenic Corridor Overlay zone, is located approximately 1.75 miles east of the Project site. Thus, the Project driveways into Foothill Boulevard would result in a less than significant impact to aesthetics.
Letter from M. de la Torre		
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 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.	Comment in support of the Project is noted.
Letter from M. Vellasco		
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 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.	Comment in support of the Project is noted.

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Letter from M. Moreno		
I-110	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. Bridge Development has pledged millions of dollars to improving the project site and to developing a long list of benefits to our community. We should absolutely say YES to this pan. Or we risk losing an important opportunity to remake this site.	Comment in support of the Project is noted.
Letter from N. Rand		
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.	Comment in support of the Project is noted.
Letter from A. Alcaruz		
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, school 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.	Comment in support of the Project is noted.

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Letter from T. Denton		
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. The number of truck trips are also greatly reduced will mainly take place at night. Please vote to approve this project.	Comment in support of the Project is noted.
Letter from R. [see bracketed comment letter]		
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.	Comment in support of the Project is noted.
Letter from [see bracketed comment letter]		
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	Comment in support of the Project is noted.

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	delay this project any further. We are running out of time.	
Letter from M. [see bracketed comment letter]		
I-116	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 design to better fit our needs. And they are putting their money where their mouth is when it comes to making significant investments in Upland. 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 this. This is why I believe you should support the project.	Comment in support of the Project is noted.
Letter from F. [see bracketed comment letter]		
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!	Comment in support of the Project is noted.
Letter from V. [see bracketed comment letter]		
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	Comment in support of the Project is noted.

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	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.	
Letter from [see bracketed comment letter]		
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.	Comment in support of the Project is noted.
Letter from C. SP [see bracketed comment letter]		
I-120	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 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.	Comment in support of the Project is noted.
Letter from D. Casillas [see bracketed comment letter]		
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	Comment in support of the Project is noted.

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	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 with a traditional development.	
Letter from T. Mejia [see bracketed comment letter]		
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 ultimately come to fruition. I think this is really 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.	Comment in support of the Project is noted.
Letter from M. Mercedes		
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	Comment in support of the Project is noted.

Comment Number	Comment	Response
	their original design. Please vote to approve this project!!	
Letter from L. Saldana		
I-124	We should 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 though a company would legitimately change their plans in order to make the community happy, but here we are. At this point, they've made the changes we asked for and then some, which is why I believe you should support this project.	Comment in support of the Project is noted.
Letter from S. Ortiz		
I-125	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. 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 present with a great plan for improvement and I think it would be silly to do nothing with that.	Comment in support of the Project is noted.
Letter from T. [see bracketed comment letter]		
I-126	I believe we should approve the proposed development on Foothill	Comment in support of the Project is noted.

Comment Number	Comment	Response
	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.	
Letter from C. L. Letter from T. [see bracketed comment letter]		
I-127	I am writing 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.	Comment in support of the Project is noted.
Letter from A. Hernandez		
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.	Comment in support of the Project is noted.
Letter from A. Z. [see bracketed comment letter]		

Comment Number	Comment	Response
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 the 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.	Comment in support of the Project is noted.
Letter from R. Saunders		
I-130	You should vote to approve the project ton 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. 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!!	Comment in support of the Project is noted.
Letter from [see bracketed comment letter]		
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.	Comment in support of the Project is noted.

Comment Number	Comment	Response
Letter from D. [see bracketed comment letter]		
I-132	I sincerely hope you support the proposed warehouse development on Foothill Boulevard. 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!	Comment in support of the Project is noted.
Letter from A. N. [see bracketed comment letter]		
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.	Comment in support of the Project is noted.
Letter from B. Venegas		
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	Comment in support of the Project is noted.

Comment Number	Comment	Response
	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.	
Letter from D. Cavenos		
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 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.	Comment in support of the Project is noted.
Letter from V. Guizor		
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 ears 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 works best for our community. They greatly reduced the project size and overall	Comment in support of the Project is noted.

Comment Number	Comment	Response
	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.	
Letter from L. Telles		
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 the 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.	Comment in support of the Project is noted.
Letter from Y. Cabrera		
I-138	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. The Bridge team is construction 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.	Comment in support of the Project is noted.
Letter from S. Covarrubias		

Comment Number	Comment	Response
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.	Comment in support of the Project is noted.
Letter from M. Gomez		
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 direction $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 to the project forward without delay.	Comment in support of the Project is noted.
Letter from M. [see bracketed comment letter]		
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	Comment in support of the Project is noted.

Comment Number	Comment	Response
	larger community. Please support this endeavor, as I would like to see this community grow and prosper.	
Letter from M. Balderas		
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.	Comment in support of the Project is noted.
Letter from S. Joy		
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.	Comment in support of the Project is noted.
Letter from J. Jaurogui		
I-144	Please support the project proposed for Foothill and Central. The plan considers community feedback, and I am eager to see what can be built	Comment in support of the Project is noted.

Comment Number	Comment	Response
	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.	
Letter from D. Livingston		
I-145	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. This is a smart development that I believe can work for both residents and businesses, and we should welcome it in Upland.	Comment in support of the Project is noted.
Letter from L. Morales		
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 that will create for Upland!	Comment in support of the Project is noted.
Letter from Corey K.		
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 wonderful benefits a project like Bridge's would bring. They have committed to operating most of the trucks a night and	Comment in support of the Project is noted.

Comment Number	Comment	Response
	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.	
Letter from K. W. [see bracketed comment letter]		
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 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!	Comment in support of the Project is noted.
Letter from M. Araya		
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.	Comment in support of the Project is noted.
Letter from R. D. [see bracketed comment letter]		
I-150	The vacant area at Foothill and Central is in dire need of revitalization, and	Comment in support of the Project is noted.

Comment Number	Comment	Response
	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.	
Letter from A. Frias		
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.	Comment in support of the Project is noted.
Letter from [see bracketed comment letter]		
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.	Comment in support of the Project is noted.
Letter from M. Cana		

Comment Number	Comment	Response
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. Form 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.	Comment in support of the Project is noted.
Petition signed by 137 individuals		
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 comer 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/1-MU) and is listed as such in the General Plan.	The Project is a warehouse facility consistent with Title 17 of the Zoning Ordinance, specifically Section 17.51.010 of the City's Municipal Code which defines warehousing as the provision of facilities used primarily for the storage of commercial goods, including documents. The Project is located within the C/I-MU zone, and Section 17.05.020 of the City's Municipal Code identifies warehousing as a permitted use within the C/I-MU zone. The General Plan is consistent with the Municipal Code and identifies that warehousing is an allowable use within the C/I-MU zone. The project is also consistent the General Plan's description of the C/I-MU zone as follows: "The Commercial/Industrial Mixed-Use designation is designed to accommodate a variety of industrial and regional retail uses and to support commercial activities to satisfy a range of shopping needs for residents of the community. It is also intended to encourage development of business in the City and to maximize the potential for job generation. Uses supported under this category include commercial and industrial. Typical industrial uses could include limited general industrial, manufacturing, assembly, warehousing, multi-tenant industrial, research and development, and airport–related uses. Typical commercial uses include retail commercial and durable sales goods, tourist-related commercial, entertainment, recreational uses, administrative and professional offices, commercial activities, business support services, food and institutional

Comment Number	Comment	Response
	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. 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-I) 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	uses, as well as residential, subject to a reasonable minimum increment of land area as well as a special use permit process." (emphasis added) The project is also consistent with the following General Plan policy of the City: "Policy LU-3.2 Economic Revitalization. Promote the development of vacant and underutilized parcels with higher intensity commercial and industrial land uses." The IS/MND provides a comprehensive and thorough analysis of the environmental impacts of the Project as required by the CEQA Guidelines. Accordingly, the IS/MND includes more than 1,800 pages of environmental analysis, including 10 technical studies and evaluated all required thresholds required by CEQA and City requirements. Detailed technical studies analyzing the potential environmental impacts of the proposed Project determined that all impacts, including traffic impacts, would be less than significant either before or after mitigation, therefore an IS/MND is the appropriate environmental document consistent with CEQA, and an EIR is not required. Nonetheless, all of the technical studies included in the Project's IS/MND are the exact same technical studies that would have been included in an EIR. Each study's level of detail and thorough, comprehensive analysis is the same between this Project's IS/MND and an EIR. The only technical analysis that would have been in an EIR, that is not in an IS/MND, is an evaluation of alternatives to the Project. Therefore, there is no project-specific analysis that is missing from this IS/MND which would have been included in an EIR for the Project. The IS/MND prepared for the Project thoroughly analyzes all thresholds required by the CEQA Guidelines. In accordance with the CEQA Guidelines, the IS/MND evaluated the required environmental analysis of 20 environmental areas. Further, the IS/MND overestimates the Project's environmental impacts as it analyzed a 276,250 sf building; the Project has since been further reduced in size by 75,154 sf, or nearly 28% to the currently proposed 201,096 sf building. The traffic analysis prepared by Translutions included in the Draft IS/MND was peer reviewed by both Gibson Transportation and TKE Engineering.

Comment Number	Comment	Response
	mandate an Environmental Impact Report.	Therefore the traffic study included in the Draft IS/MND is the product of analysis and input from three independent traffic engineering firms Van parking spaces are not an indicator of actual trip generation. Rather, the trip generation rate is appropriately based on building square footage because building square footage represents the total amount of goods/delivery capacity of a building. The number of van deliveries is capped by the size, i.e. capacity, of the building to store goods for delivery. This is why the ITE trip generation rate is based on building square footage, and not van parking spaces. Further, in this case, total van deliveries (and, thus, trip generation) is limited due to the daily truck delivery cap. The IS/MND thoroughly analyzed all thresholds required by the CEQA Guidelines and determined that the Project would result in no significant impacts after mitigation; impacts to aesthetics were found to be less than significant. As discussed in the IS/MND aesthetics threshold, there are no State or County designated scenic highways proximate to the Project site. Although Foothill Boulevard is not designated as a state scenic highway, the City's Scenic Highways element had previously identified Foothill Boulevard as a corridor of scenic and historic interest. The City's General Plan no longer includes a Scenic Highways element, but guides development along corridors using focus areas, including a focus area for Euclid Avenue, which is within the Scenic Corridor overlay zone. The intersection of Foothill Boulevard and Euclid Avenue, which is within the Scenic Corridor Overlay zone, is located approximately 1.75 miles east of the Project site. Thus, the Project driveways would not conflict with the General Plan Focus Areas related to Foothill Boulevard and, as described in the IS/MND, the Project would result in a less than significant impact to aesthetics. The request for potential future clarifying updates to the Municipal Code is noted for Planning staff. The comment does not raise any issues or address the adequacy of the IS/MND.

Comment Number	Comment	Response
Petition signed by 748 individuals		
I-155	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 support our police department and local businesses. We urge the City Council to approve the project.	Comment in support of the Project is noted.

Attachment A

Comment Letters Received

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.

[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*.

RA-1a

South Coast AQMD Staff's General Comments

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

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).

RA-1a cont.

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.

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].

RA-1a cont.

[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

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-1b

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. RA-1c

Mitigation Measures for Operational Air Quality Impacts from Mobile Sources

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-1d

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-1e

c) Establish area(s) within the Proposed Project site for repair needs and ensure that these designated areas are away from any sensitive receptors. RA-1f

Mitigation Measures for Operational Air Quality Impacts from Area Sources

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-1g

e) Require the use of electric landscaping equipment, such as lawn mowers and leaf blowers. RA-1h

f) Maximize the planting of trees in landscaping and parking lots. RA-1i

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)

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. RA-1l

[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.

Fulfillment Center Characteristics as defined by ITE study: 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 6th 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.

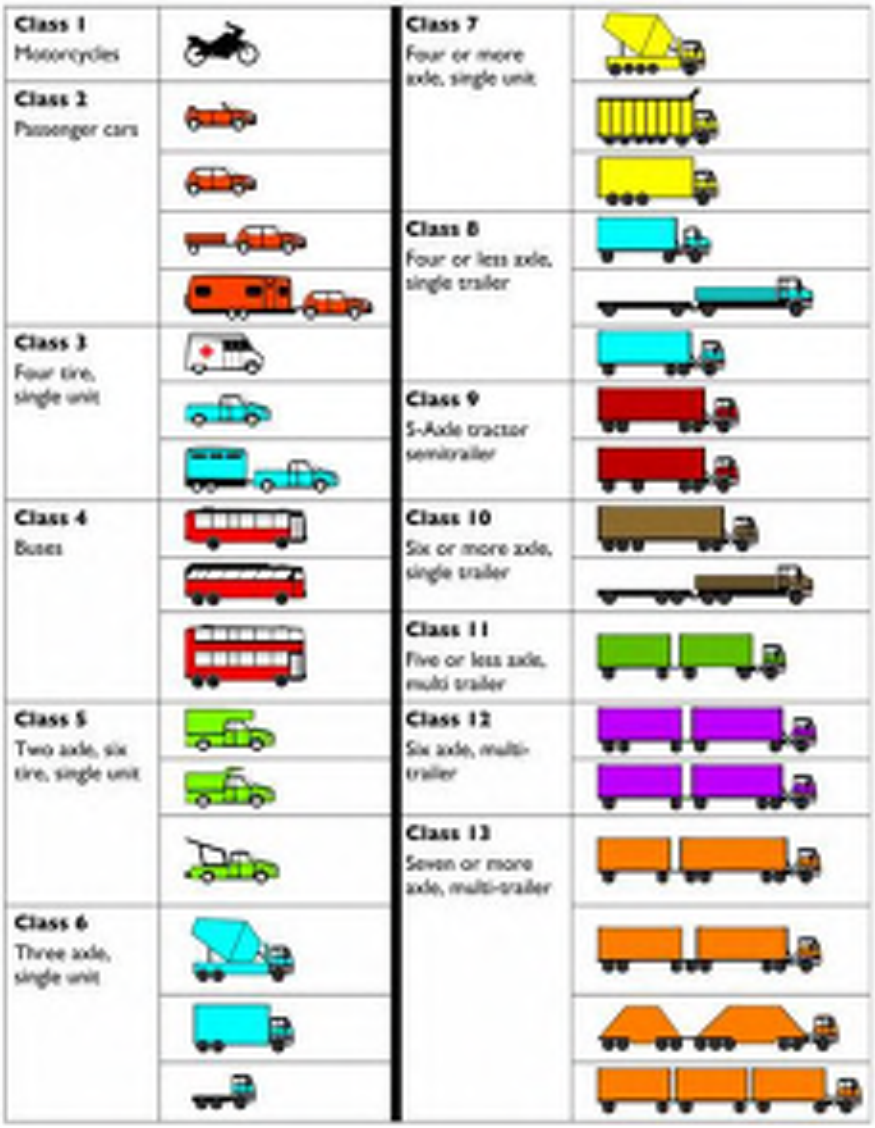
Truck Sizes – Truck size can vary significantly between similar sites. Sizes and types are a function of the origins and destinations of the goods processed at the facility (i.e., location in the supply chain). Local deliveries to business/residential customers are commonly made with smaller trucks (except 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

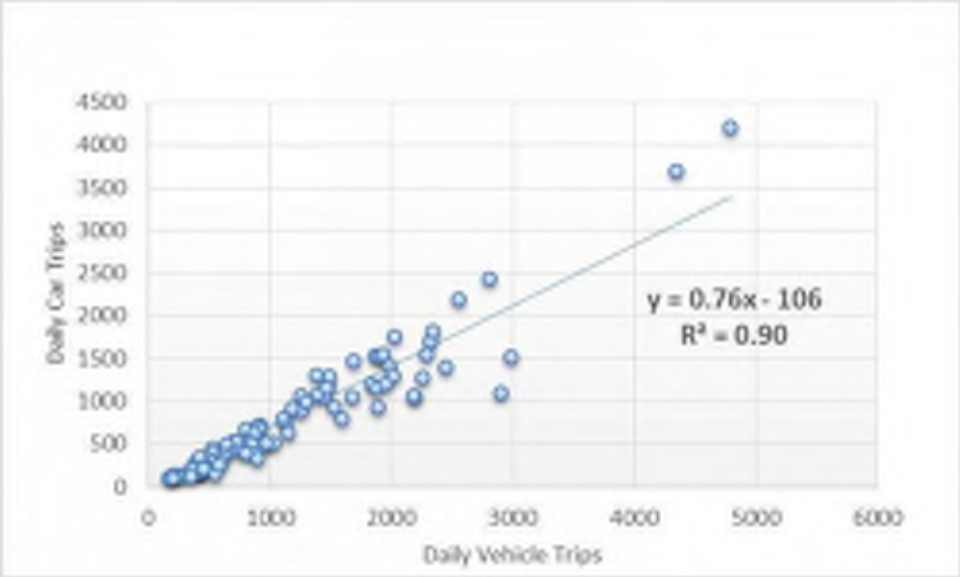
Note: The values in parentheses represent the number of data collection sites for HCW type.

[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



Key Findings – Daily Trip Generation

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)

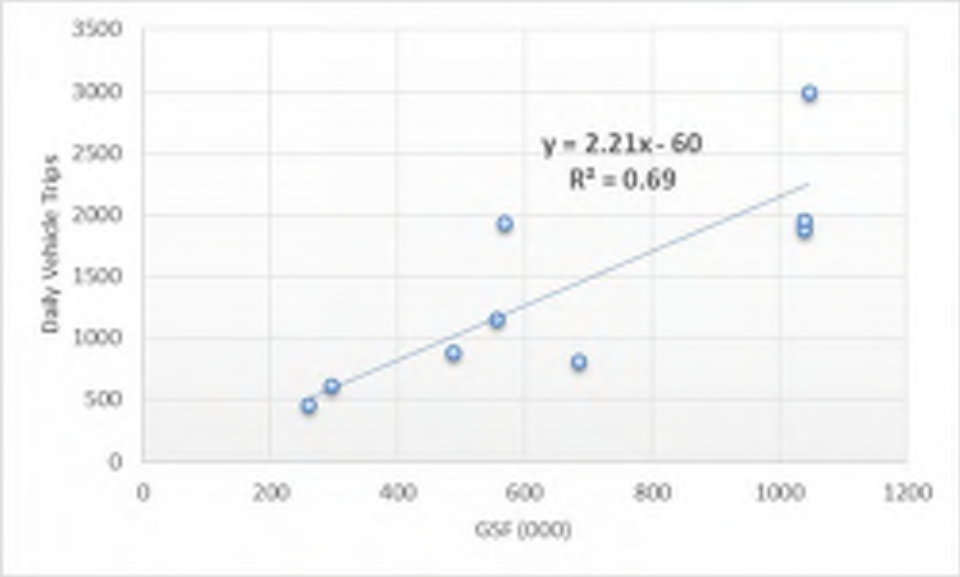
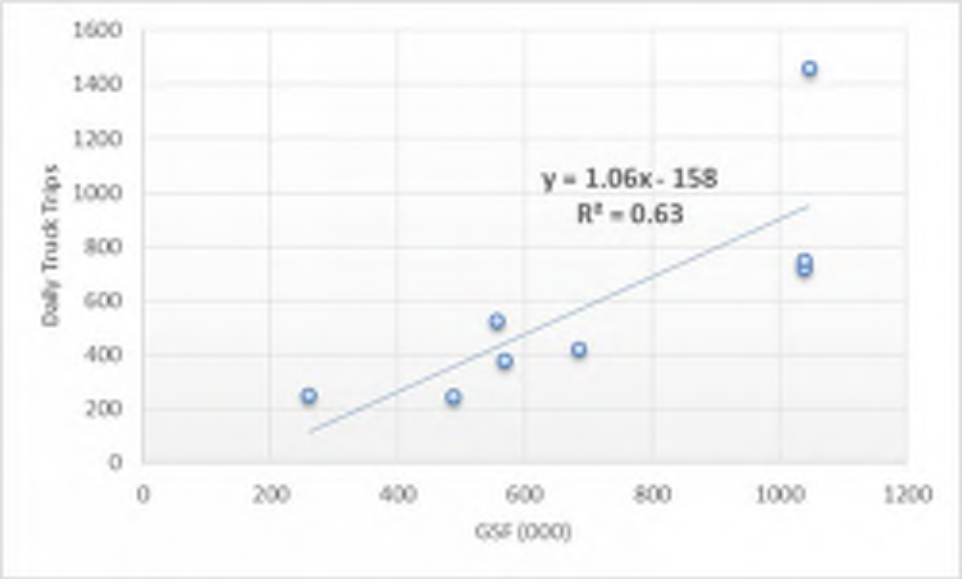


Figure 4 presents the data plot for daily trucks. The plot includes a fitted curve equation with an acceptable R^2 value. The weighted average rate for daily trucks at a cold storage HCW is 0.836 trucks per 1,000 GSF.

[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* 9th 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

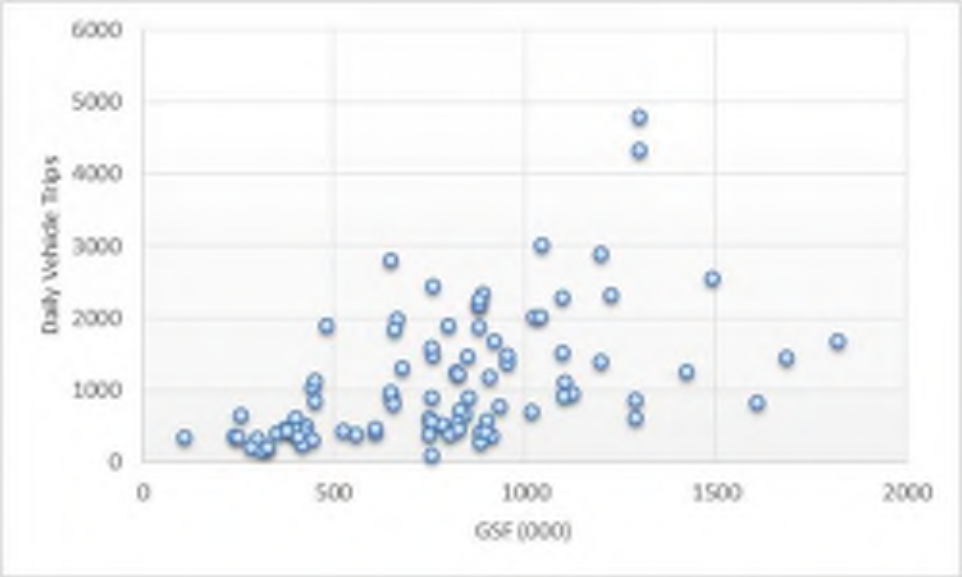
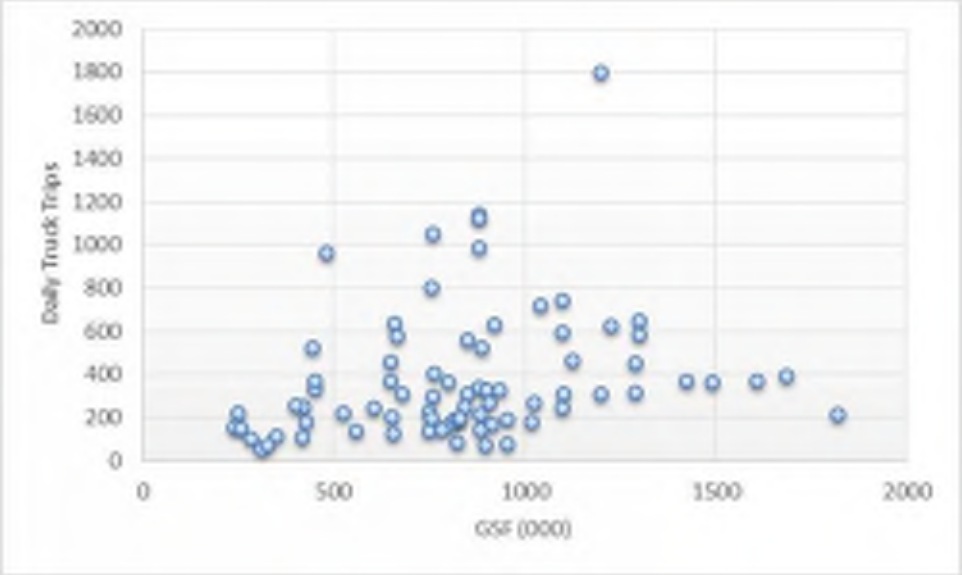


Figure 6 presents a plot of daily truck trips against building square footage at transload and short-term storage HCW. For trucks, the weighted average rate is 0.454 trucks per 1,000 GSF.

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

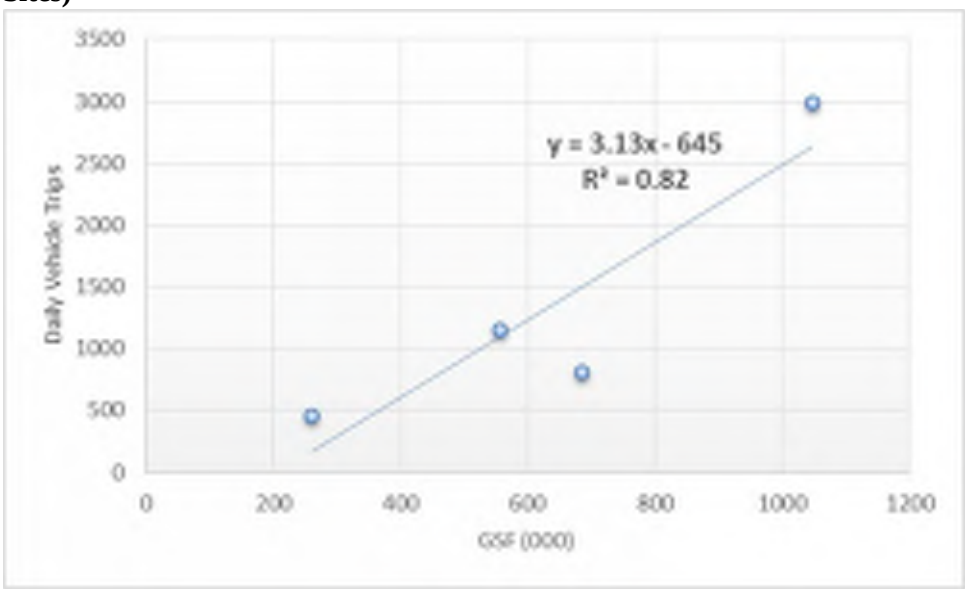
Data Site Subset	Percentage of Total Daily Vehicles		
	Cars	Trucks	5+ Axle Trucks
All	67.8%	32.2%	19.4%
SCAQMD	69.0	31.0	17.7
NAIOP	68.6	31.4	21.8
SCAQMD & NAIOP	68.8	31.2	19.0
Non-SCAQMD or NAIOP	66.6	33.4	---
More than 500,000 GSF	68.7	31.3	19.2
More than 800,000 GSF	69.4	30.6	18.5
More than 1,000,000 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)

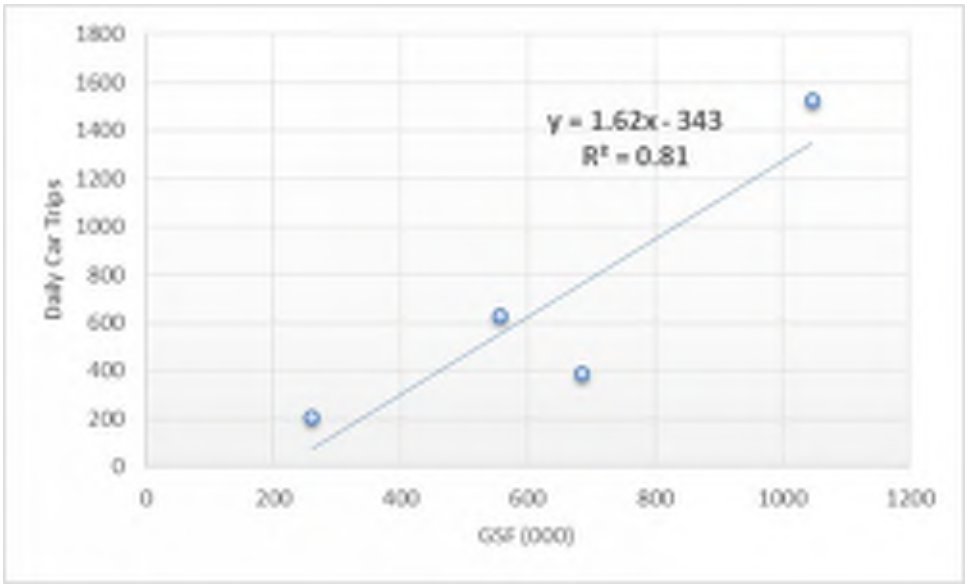


Figure A3. Correlation between Daily Trucks and Cold Storage GSF (SCAQMD & NAIOP Sites)

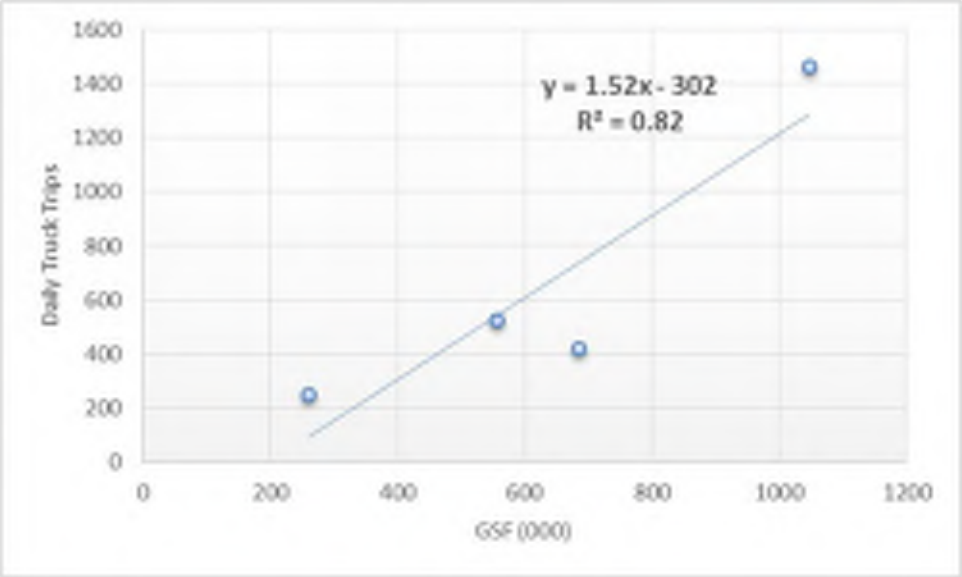


Figure A4. Correlation between Daily 5+ Axle Trucks and Cold Storage GSF (SCAQMD & NAIOP Sites)

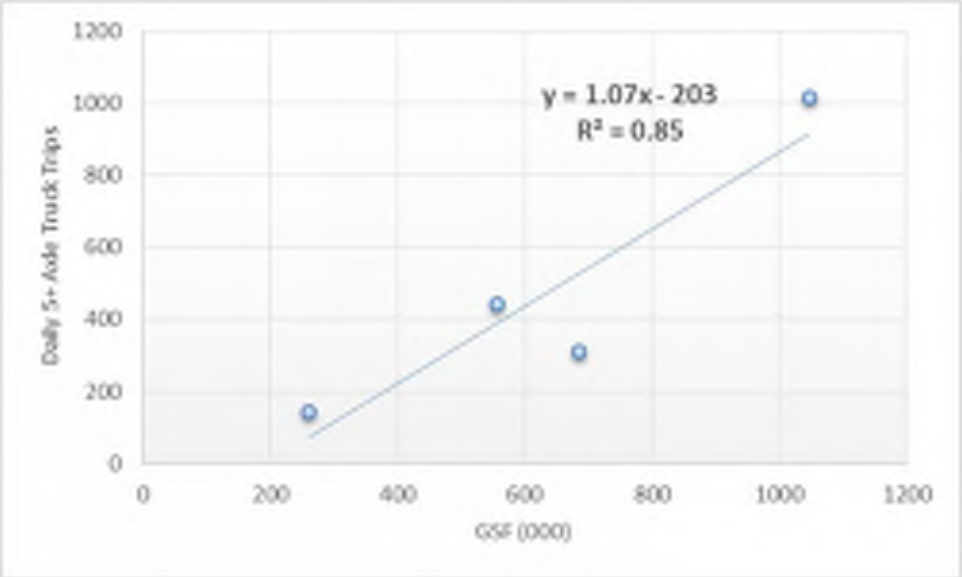


Table A2 presents the weighted average rates for all vehicles, cars, trucks, and 5+ axle trucks per 1,000 GSF at cold storage sites. Separate calculations are presented for the complete database plus 13 different subsets. When the complete set is included, the overall weighted average rate for all vehicles 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

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.

Hello Mr. Poland,

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

I-1

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

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

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.”

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!

I-2

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

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

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

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

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

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

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

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

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

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.

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.

I-6

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

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

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.

I-7

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.

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

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

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 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-8

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 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-9

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

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

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 have several objections that reflect political, financial impact, and ultimately what the community of Upland will be as a result of this decision. I-11

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

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

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.

The proposed $2.25M Development Fee:

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.

The proposed $2M in "future road maintenance":

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

I-12

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

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

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

I-14

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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14
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.)

MAYOR STONE: All right. So we'll -- I'll turn it over to --

PLANNING COMMISSIONER CHAIR: And we are calling

to order the meeting of the Planning Commission and Airport Land Use Committee and I'll ask you for a roll call please.

(Roll call of the Planning/Airport Land Use Commission taken.)

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

Well, I note I just wanted to -- Mr. S had called and asked to make a statement that he reason he isn't here this evening is he had a commitment with his daughter in Orange County that he could not miss and that he welcomes any phone calls, emails from anyone that's here this evening to please reach out to him if you have any questions for him.

All right. So the first thing is I would just like to thank each and every one of you for being here this evening. We all look forward to the presentation.

This is a workshop and an opportunity for the Planning Commission and the City Council to hear all of your concerns.

There will be no decision made tonight for this is information only; so thank you again for being here and if you do have comments or concerns,

please fill out a card and make sure that you get it to our city clerk.

So thank you again.

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

THE CLERK: Okay. This is the time for any citizen to comment on any item listed on the agenda only.

Anyone wishing to address the legislative bodies is requested to submit a speaker card. And everyone is requested to their keep comments to 3 minutes.

At this time I have 13 cards, I will call up two people at a time, ask that the second speaker to be on my right at the end of the aisle. And the --

MAYOR STONE: All right. Thank you.

THE CLERK: First is Steve Beerbong followed by Ray Lesser.

STEVE BIERBUAM: Good evening, City Council and members of the Planning Commission.

I want to first go on record as saying that I have attempted personally on many occasions to communicate with the City Council, with the Planning Commission and to the developmental services staff on

I-15

this. And on three separate occasions via email I have received zero response, none whatsoever.

The first was on December 22nd, I asked about what would it take for this not to go through, basically asking about if we gathered signatures, what would it take for the City to say from the citizens that this isn't going to work. I received zero response.

On December 30th I contacted the City, the same people that I've already previously mentioned and said that we're supposed to be receiving 2 million dollars in future road maintenance from Bridge Development as part of this project. My

question was simply is that 2 million dollars supposed to go into the General Fund or into public works, or is that 2 million dollars part of the calculated improvement to 13th Street and Benson in front of Cable Airport?

No response.

That being said, I want to make sure, and I've already sent and received no response, that this is my official notice of opposition to the Bridge project. It has nothing to do with Bridge. I absolutely believe that that development should be --

I-15 cont.

that site should be developed; however, I'm opposed to it being developed in this manner because over the past two years I've seen quite frankly how the City has operated, the position that they've taken, the direction that they've taken in making sure that this particular development moves forward.

They've been aware of it, the illegal operations that have occurred, the deals that were made two years ago over this. Subsequent deals over a year and a half ago to provide easements from the west end water to Bridge Development, actually they

didn't go to Bridge Development, they went specifically to Giovanni, and then subsequent to that my own personal observations of the illegal operations that have been occurring on Airport Drive and the Giovanni site, and what breaks my heart is to continue -- I can tell everybody here who's sitting here watching I absolutely can prove by documentation, video and photographs that the City was aware of illegal operations being the um of dirt onto that site which did not discontinue until San Bernardino County Environmental Health got involved, yet there's an MND that we're supposed to just accept and move on when there's all these new

I-15 cont.

projects going on on the west end of the City.

Okay. Numerous projects. Industrial buildings being built, educate yourself. New residential complexes.

I'm not against Bridge Development, please ensure that you request an EIR on this. Thank you.

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

RAY MUSSER: Good evening, City Council and

Planning Commission. This is the first I've been here except to honor a person that had been with the Upland Community Foundation Sister City some time ago.

I was the one that brought this project to Marty Theo back in 2016. It wasn't in this form. We sent it to -- we called in Majestic Realty, the largest financial real estate firm in America, private is the key word, and they did a pass on this project. Then it went to Lewis Group and they did a pass.

And now we have Bridge and there might have been a player there between there, I don't know for sure, but what we tried to do, and I don't quite see all of it here, I do see 370,000 annually coming here according to the brochure I received as I walked in,

I-16

that helps a lot, that's a whole lot better than zero.

We have a firm in the City that has 33 other locations and is doing a building right here in Upland. We get the tax base on all 33 of those. And I'm not going to mention the name but that's

happening. I just talked to them about a month ago and said is it still a thing? They said yeah, we have a bid for -- I think it's this area and it may run out. That's what we should do.

If we're selling something or moving it to sale, it ought to be taxed and that's exactly what's happened to this other firm.

This other firm, when you say 33 -- it's unbelievable. They're our third and fourth highest sales tax, independent what data are you looking at. That's huge. You put two Home Depots together and it can't match that.

So I would say I don't know a better project. I walked with this project with Howard and when it had a lot of homeless people up there, I should never be with tumble weeds, I close up real fast, but here was a gang group, he was here was an alcoholic group, and here was a drug group, all

I-16 cont.

different camps.

I'm saying this is much better than what we have. This is good and if we can just get more sales

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

I-16 cont.

Thank you for your time. I appreciate being here. And God bless.

THE CLERK: After Mr. Weiss is Mark Walters.

ERIC REESE: Hello. My name is Eric Weiss.

My suggestion would be for the City to partner with the developer and consider the use of porous reflective payments as approved for the material for the proposed project.

Inserting porous reflective pavements would help enhance environmental mitigations, will also help in reduce costs for the City and the developer.

Portions of the pavements can reduce paving surface temperature by up to 11 degrees Fahrenheit, therefore helping to provide for reduced air conditioning which results in lower energy costs and reduced air pollution.

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.

they're able to handle extreme temperatures and **.
This decreases pavement cracks and all that occur

I-17 cont.

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from pavement stress, resulting in reduced costs to repair and replace worn-out pavements.

I would highly recommend the City to partner with the development looking into porous reflective pavements as they could help the developer and the City be better stewards to an the environmental impact that will use its own roads in the future.

Thank you for your time and hopefully you'll consider my proposal that can make the City and the developer better convenient environmental stewards.

THE CLERK: After Mr. Walters is Ermalinda Osuna.

MARK WALTERS: Good evening, before I begin today I'd just like to let everyone know that it's national law enforcement appreciation day.

Please thank a police officer tonight.

Good evening Mayor, City Council persons and Planning Commissioners. My name is Mark Walters, I am a retired police officer with 25 years experience, 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

they're going to be using on a one-time only event, it will cost the City of Upland $5,687,500.

Also using national averages on a heavily traveled roadway, you can expect the need to repave these roadways every 10 to 15 years. Being a 50-year lease and using a national average, the City of Upland will spend $22,750,000 out of Upland's General

I-18 cont.

Fund to maintain these designated roadways.

Please keep in mind this does not include inflationary costs nor does it include lane striping, Botts' dots or intersection sensors.

Since our city is already broke we will obviously need to cut costs.

Are we going to cut our city staff? Are we going to cut our police staff? Are we going to quit trimming trees? Are we going to shut down the library? Are we going to close our parks down? Will we have to do all of the above?

Based on the above cost-benefit analysis this project will cost the City of Upland way more than the benefit and I recommend you vote no to this potentially city-bankrupting project.

Thank you.

THE CLERK: After Ms. Osuna is Roger Stevenson.

IRMALINDA OSUNA: Good evening my name Ermalinda Osuna. I am a 60-year resident and hopefully we can get the video projector public.

Again, I'm a 60-year resident, and I'm also on the the mother of two college-age and bound boys, one is not, he's trying to find his way and trying to find a good living wage job. And the reason why I

I-19

bring this up is because two months ago when I came forth in front of the Planning Commission I expression the my concern that having Amazon in our city would -- is very concerning for me.

If you look at the history over the years, Amazon has a very bad reputation. This is why they -- their name is not disclosed in this there plan and many of the other plans you see in Inland Empire.

So with that the reason why is because they pay poverty wages. Okay? They are -- they pour millions of dollars in cities who implement these

policy decisions and I'm just very concerned that you know this is -- this -- this -- the president of this company and it's not a very popular company.

But I'm here to annoyance announce that we are having a grass roots community workshop on Saturday and the reason why is because then just two months after I spoke, we a recent report came out from the current round table, it's a scathing report, fact-based highly researched report, very comprehensive that talks about the actual economic impact as a result of Amazon's footprint in our community, especially in Inland Empire.

I-19 cont.

And it's very important that we educate the community just to give you a little bit of a preview, Amazon is actually benefited from public subsidies. We, the taxpayers, are subsidizing their employees.

Now keep in mind this is a 900 dollar -- 900-billion-dollar company and they are really taking full advantage of the public subsidies and this is why they are monopolizing and really just diving into eCommerce.

So it's very important that we educate our

community and in this slide here we're going to have an expert, this person who was part of this study, to talk about the actual impact. And, again, this is a social impact.

And then we're going to talk -- we are going to have someone talk about the environment impact and be able to quantify what is the implication for Upland. And so we need to be able to look at the cost-benefit analysis as Mark mentioned and really do a deep dive an and make sure that at the end of the it all when we look at the studies, the information, that we work with Bridge Development to formalize a community benefit agreement.

This is where we're going to sit down and

I-19 cont.

make sure that we can mitigate those costs.

I know that Bridge has been doing that with Community Commercial, with other departments. I know that Bridge Development would be willing to work with us, the grass roots community to formalize a community benefit agreement.

Thank you.

THE CLERK: After Mr. Stevenson is Carl Bunch.

ROGER STEPHENSON: Good evening, Council and Commissioners. My name is Roger Stevenson. I'm here to make some specific comments related to the draft initial study and MND the.

In terms of my background I'm a civil engineer. My career has been based on large scale public works projects and before I forget, I will be submitting these and other comments in writing with discussion because three minutes is not enough time for an engineer to get into technical stuff.

Okay. So first thing, project description. The building is smaller now, almost a third smaller but the activity level hasn't decreased. There will be highly active loading areas on either side, the north and south side. Those areas should be included within the overall square footage of the building

I-20

when you're figuring things like parking and employee and other area rented -- excuse me, area-related stuff.

So the square footage should really be up around 300,000 or more square feet.

Careful reading of the Upland General Plan, look at the zoning for the proposed site, you read that, it says limited warehousing. That's how that sentence works out.

Down on the south side of Foothill for the -- the College Heights area it specifically says warehousing and distribution. Okay. So the General Plan is based on a distinction between limited warehousing and warehousing and distribution. And on that basis the proposed site doesn't meet the General Plan.

And that finding -- also that indicates that it's compatible, well, it might be compatible but that does not mean it meets the zoning requirement.

In terms of traffic impact analysis, which is a -- a big element of the initial study, the existing traffic impact analysis did not adequately represent the traffic that would result from this particular facility and that's both total trips and

I-20 cont.

more importantly the hourly distribution of travel to and from the facility.

The Institute of Transportation Engineers land use classification that they use was developed based on facilities that are different in character than what is being proposed here as a van delivery center; so therefore the data that they used isn't appropriate and so therefore the results of the transportation analysis, including any recommended road improvements or whatever, aren't valid.

And then the last thing I want to make a comment on, the -- the retail analysis memorandum. Well, that's got nothing to do with anything. That site isn't zoned that way and I think it was put in there as a diversion from doing what is needed, which is look at the details of the project.

I-20 cont.

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

CARL BUNCH: Hello. My name is Carl Bunch.

There's three points I want to make. The first being that if another some reason this goes through I think that median on Foothill must be constructed so that there's no traffic that could access those two access points on fruit hill that

I-21

they're planning on, because that would just be a mad house if you had vans cutting across Foothill right there at Central to get into the access, which you know they will, because who knows what percentage of these drivers are not going to be Amazon employees, they're going to be independent contractor.

So if for some reason it about goes through please construct a median so that you cannot access the not side from the south side of Foothill.

The second thing is again if this goes through, we must have specific financial penalties in -- in the conditional use permit or whatever the contract is. If or when Amazon exceeds the truck and delivery trip total, because they're telling us it's a certain amount right now, fine.

When they exceed that, what are their financial penalties going to be and how do we collect? Because we certainly should if they're telling us it's one thing and of course it's going to be more.

It would be very easy to have a couple of police cadets you have there counting trucks and vans and like hey oh, you guys are double what you said you were going to be; so let's get that in writing so

I-21
cont.

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.

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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

what's happening to the City for over 40 years. And the street itself, when the police station was put in 25 or so years ago, the prior department, the county workers, the impact of that, the school on 13th Street, the amount of traffic, I live on

I-22 cont.

13th Street and I can't even get out of my driveway most of the time or I get ran over.

Now, I don't know what, you know, a lot of these people have come up with very good scenarios in what's going on for the impact and so forth. But basically I came up here to speak about the people who have to live with this traffic, this horrendous. That's why the 210 freeway was put in. I was in here long before the 210 freeway.

I was here when 16th Street was the end. Now you got Foothill getting as bad as it ever has been.

And with all the impact of Amazon building this facility and the impact of the traffic just for what they're going to do, not counting what we already have, we have a tremendous amount of traffic,

and you come down Foothill Boulevard in the evening and you're back down to the San an tone waiting to get to Euclid just to get across the street. This is going to be madness and all the people who have to live here are impacted.

Think about the persons and the people who live here and what they have to put up with. It is not enjoyable. It is not the City of gracious living

I-22 cont.

like it used to be when we have to fight and put up with this. And now we've got Amazon who's going to bring in a million people.

I understand it's a 50-acre warehouse. The impact of all of their cars, the people going to work there, the people going home, it's just going to be Benson Avenue and over to Foothill and the 210, isn't just going to be all in one area.

So there's a lot of people here that I know who live in the area that are here to listen because of the impact of the traffic. It is horrendous.

Now I am a facilities person, director. I've been a businessman. But just hearing about this thing, I haven't had time to do some of the studies

except for living here for this amount of time, over 40 years.

So I hope the Council really looks into the people also.

Why don't you take and put up this thing up on the hill further instead of here.

Thank you very much for your time.

THE CLERK: After after Mr. Bahat is **

BILL BEHJAT: Hello. My name is Bharat, I testify last time I was here.

I-22 cont.

The consequences of the heavy traffic, the -- occupying our roads and now -- and the area to the residential and -- and the industrial come commercial areas, so many people of this city request that -- that I do a chart here.

I spend a couple of days doing that with a consulting firm that is an environmental consulting firm and the result was failure.

So I have the actual HRA here for the mayor; so I can present it to you, that HRA fail.

As a result the SRA indicates that some

I-23

people would develop cancer and that does not include health risk assessment for asthma or other illnesses. This is just cancer.

I've been talking to head of pediatric oncology at Kaiser who is -- who is right now present here. And he also indicated that -- that the impact on the children, on minors, that are going to pediatric oncology at Kaiser are much higher in the area that they have distribution centers because of the trucks.

So it's black and white in front of you. And for the sake of the children of the facility -- of the -- the Upland and -- and also the -- everybody

I-23 cont.

who are more susceptible for illnesses, I recommend no on this project for this area.

Should I present you this?

MAYOR STONE: You can leave it with the clerk.

Yes. Thank you.

THE CLERK: After Ms. Murray is John Winnert.

FARIBA NOORY: Good evening. I guess I'm following with Mr. Bahat's comments since I heard about this proposal I have been looking at the online

newspapers and whatever I can get my hands on.

And these two articles, one is November 20 -- November -- I'm sorry, October 27th, the other one is November 1st, LA Times. And this one says limit, FAR to limit warehouses as falling short. The other one says beg banking big warehouses right next to homes.

I-24

The article goes even though assuming 1,000 feet away is still the impact of the pollution on individuals, especially the children.

I'm just going to add -- I'm going to take a moment of your time -- of your time but I'm going to read only one paragraph over here.

It says experts have long worked to develop elevated cancer near police, near warehouse,

distribution centers and other hubs because of the pollution immanent by trucks.

Physician have even labeled these places diesel dead zone.

So I leave it to you guys, you make that decision for these people, their children, their

grandchildren.

THE CLERK: After Mr. Wienert -- after Mr. Wienert is Eric Gavin.

JOHN WEINERTH: Good evening. Thanks for the time this evening.

My name is John Wienert, I've been an Upland resident for the past 18 years. I've chosen to raise my family here. I think for the very same reason everyone in this in room has chosen Upland, right, it was a safe community.

I live on 13th Street, right between San Antonio and Mountain; so this is new for me. Speaking in front of the Council and it's really to share some concerns I have.

I have a son that walks those streets to school every day. There's --

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

I-25

There's three schools within one square mile of this project. You know, I know there is committed traffic patterns that they say they'll -- they'll be dedicated to. I find that highly realistic because

these are humans driving these tricks and vans, humans that need to stop at the bank, they need to stop at the drugstore.

So I would just implore you, I don't know if you still have school age children, grasp grandchildren in some cases, if you're living in these neighborhoods, if your children are walking these streets, if you're trying to sleep at night with trucks zooming by for that matter, you know, I'd implore you to really consider supporting this project.

I don't have some of the tremendous statistics or economics that others present but I would start there. Right? This is why we chose to raise our families in Upland.

And, you know, we also have a police department right down the street that's going to be trying to get emergency response on the very same streets to support our residents.

So for all of those reasons, I question the

I-25 cont.

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

knee, for a lot of things that long term we're going to pay for and the community is certainly going to pay for.

So you know in the past few years I've just had to worry about a plane crashing into my house. I certainly don't want to have to worry about my son getting to and from school safely.

I-25 cont.

So thank you very much.

THE CLERK: After Mr. Gavin is Eric Neilson.

ERIC GAVIN: Keri, I wonder if I can use the overhead, please.

Good evening, my name is Eric Gavin, I'm here in support of this project. I'm here in support of this project because I want the City we all live in to grow and prosper.

Here everything in life is considered healthy if it's successful or -- and successful if it's growing --

You haven't started my time.

When a child or a tree doesn't grow, we assume that it's sick, even at maturity most people extend the rest of their lives trying to grow their minds, their families, their businesses, to grow

I-26

spiritually and emotionally. I want this city to grow and I want us to say yes.

Upland now has a well established reputation for being unfriendly to growth, change, opportunity and we are already losing out.

While Upland is saying no to a regional sports park, Rancho Cucamonga is about to add 4,000 acres, including thousands ever natural conservation.

While Upland is resisting transformation of Memorial Park --

MAYOR STONE: Excuse me.

MALE SPEAKER: -- might I remind you Ontario has received over 40 million dollars in grants to receive recite lies their down tune.

While Upland is hereby tonight trying to stop the development of private land, Montclair is redeveloping Montclair place with an investment from a build development company.

While Upland is busy saying no, now we all have to admit Sycamore Hills did go through but not without its share of Upland negativity, Fontana is bringing Hi-Tech manufacturing and is the most prosper Ross city in all of California.

I-26 cont.

25 While Upland is -- while Upland was opposing

I-26 cont.

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.

Let's give everyone the same courtesy that we give everyone. All right? Thank you, sir.

ERIC NILSSON: My name -- my name is Eric

Neilson. I seem to be the third Eric to speak. I don't know what's going on there.

I'm a professor and a department chair of the department of economics at Cal State San Bernardino and --

Thank you.

I took a close look at the air quality assessment and a close look at the green how's missions -- greenhouse gas emissions assessment. And frankly, I didn't like what I saw.

To -- to not mince words, the studies are so poorly done they need to be set aside as inadequate. And they there needs to be a full-scale environmental impact study performed.

Let me tell you some of the problems. There are mathematical errors in some of the tables. The tables refer to appendices that do not have material that's supposed to support the material in the

I-27

tables; so someone revised these reports and failed to actually make things synchronize so it's really pretty shoddy work.

Now, as one example of questionable assumptions that are included in the air quality assessment and the greenhouse gas assessment, built

I-27 cont.

into the model that the consultants generated was the assumption that when the vehicle leaves the warehouse to deliver something, the average number of miles they go is going to be 6.9 miles. 6.9 miles from Amazon delivery.

It takes that long to get to Laverne. But then once the truck gets to Laverne it drives around for a couple hours delivering packages, ragging up maybe 60 or miles more above the 6.9.

Now, the implication of that -- and that's just one error out of many, or one questionable assumption out of many, is that the reports, these air quality assessment reports and the greenhouse gas assessment reports are, what they do is they grossly underestimate the number of miles that will be driven by vehicles associated with the warehouse.

And by grossly underestimating the amount of miles that will be driven by those vehicles, they grossly underestimate the greenhouse gas emissions and other sort of noxious fumes that will be generated by those vehicles.

Now, I took it upon myself to reproduce both of those reports and created my own alternative 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

I'm a wildlife biologist. We should know what we're going to be losing bio diversity wise, we're going to b losing the cotton tails, the habitat, the habitat there for raptors to come and forage.

We're going to be losing the plant diversity there. There's going to be one day that this -- the biologist went out there and looked at the grids. There's not enough time to do an adequate survey for the birds.

And August it was done August 29th of 2019.

I-28 cont.

Those are not plants. Those are the time of the year when native plants are dormant and so a lot of plants got missed I'm sure. And just scanning the area for one species that was not recorded in the species, a dominant species in the area that's being impacted, the seeds can be same for conservation purposes. We can identify this species.

So please understand that you lose more than just space or -- or something like that, we're losing habitat for these animals.

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

to wildlife. I understand this is private land but there's not going to be any mitigation for it per say. I don't appreciate that they're going to try and plant some -- some new plants and trees. I would hope that if this does go through but I don't really recall seeing a plant pallet showing and having them commit to something like this.

But basically what I've learned, I just kind of looking at different EIRs over the years is when a community wants to claim that they're saving you a wildlife habitat, they'll just pick anything and say yes it's -- you know, they want to get credit, mitigation credit for it, they'll say that something

I-28 cont.

is transmission lines areas as well as habitat that they're conserving but whenever they want to get rid of it, it's considered useless, it's considered something that has no value.

There are many species that live there. We need to -- to determine and at least document what's going to be lost and let the community decide is that worth losing and can we mitigate for that in our

community.

Thank you.

THE CLERK: After Ms. McCormick is Brenda Swarthy.

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

Okay. A couple things. I was a former county committee member and that is the -- and I've been hearing on social media that this is approved and that you're approved of being sued.

I just believe that it's a bad. I finally decided yesterday to look that up and verify that and well almost faint the.

I have never called this a warehouse buildings, it's not a warehouse. What this is is a logistical terminal; so I assumed that the planning

I-29

board and the unified development ordinances and the permitted land uses would list a terminal as well as a warehouse and that those two things would -- would be allowed under the -- what could happen there.

Well, to my surprise, there is no terminal classification in Upland. And the code says if

anything is not listed it's strictly permitted.

This thing couldn't be approved with a special use permit or a variance.

Upon discovering this I started researching Chino where they have an an some, Fontana to see if anywhere else has put this into the simple warehouse classification and of course they hadn't hadn't.

I can't even believe I'm the only one that's noticed this when we have the City planner and other people that are supposed to be doing this.

But I had to get a planner's dictionary which was generated by Galveston, Texas. They took terms from multiple states, cities and counties all over the country to define every term in the natural world for --

So, first of all, let's read this: Board freight consists motor wait consists of various types of moved which is not air or rail.

I-29 cont.

What this needs to be is a terminal. Every single terminal definition in a planner's dictionary would fit this to an absolute -- is an absolute must.

A transportation facility which quantities of goods or cargo are stored without undergoing any manufactured process, transferred to other carriers or stored out doors and/or transferred to other locations I love this one, a facility to receive transfer, short-term storage, and dispatching of goods transported by trucks including these includes s with the types of express male service and packing distribution facilities, including such facilities operated by the post offers.

If the post office and FedEx and UPS and everyone express or DHL, they're all considered a trucking terminal, so on. This is equivalent to say a warehouse coming in here and saying it's a parts warehouse and then they pave a 38-acre parking lot and all of the sudden Foothill becomes a truck stop. This is about what's about to happen here.

You know, there's 1100 delivery vans and 25 trucks. Anything over 5 trucks is considered a terminal.

So you have a fiduciary duty not to approve

I-29 cont.

this because this is not permitted in the land use

code.

Thank you.

THE CLERK: After Ms. Swarthy is Lois Sickendieter.

BRINDA SARATHY: Good evening, Councilmembers, and members of the public. My name is Brenda Swarthy. I'm a press for of environmental analysis and I a Ph.D. in environmental science and policy from the University of California Berkeley.

I thank you all for this opportunity to learn more about the project. I am looking forward to that.

And I -- there's thousands ever pages of documents for Planning Commissioners, City Councils to pour through, much of it very technical, including technical appendices; so a couple of things that I do want to raise some of my concern about and I'm looking forward to hearing more about.

I-30

And I will be submitting comments that I but I'll get them to you by January 21st so it's in the documentary record.

First has to do with the Tier 3 thresholds in the greenhouse gas appendix and this -- because

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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.

traffic studies and the you used level of service measures and you might want to consider vehicle miles

I-30 cont.

traveled. It's a common measure used in a lot of metropolitan areas; so it is ground tested. And that might give a more accurate numbers.

I am deeply concerned about traffic congestion. It's not simply about the roads but we're talking about air quality, idling, what does that mean, some of it with a much more vaporized impact.

This is a singularly use the type of facility. You can't simply compare it to allows or a home retail versus warehouse.

This is a semi-logistical hub. And so it is incumbent upon you perhaps go look at facilities such as Chino and elsewhere, there is the whole ITE study, Institution of Transportation Engineering, this is a recent development in the area, they're trying to figure out how to quantify high warehouse projects, there's even given degrees for it, parcel hub, et cetera. So there's a lot there.

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

forward without an environmental impact report.

I find that this initial study has flawed methodology, uses outdated software, in some instances by 20 years. Indicated conclusions were based on analysis and results not well defined. Inputs to models were not defined. Analysis software programs were not disclosed. And if they were, the

I-31 cont.

ref date and the revision number was not disclosed.

Most raw data output was not included. That was unexpected.

In my opinion as an environmental engineer, this initial study does not make standard engineering best practices which also leads me to question whether or not it was peer reviewed, which is part of due diligence by City planning staff.

For example, on the hydrology calculations we already know this project is 50.25 acres; however, the proposed site only includes hydrology calculations for 48 acres. What happened to the other 2 acres? I don't know.

That would -- that should have been caught in the peer review.

Another example, on the hydrology calculation and analysis program done in May of 2018 on the existing site, a lot of these studies as existing versus the proposed. On the existing site they used a software program with a revision date of 2016 and a version date of 20023. It was good -- it was good data, it was a good output.

And then I compared that to the proposed. The proposed used version 8 dated 1999. Dated 1999.

I-31 cont.

As a reg writer, I write specifications and what I am acutely aware of is that going from a 2016 version which is still the most current to a 1999, you miss 20 years, over 20 years of regulatory updates, improved mathematical modeling, improved mathematical relationships.

I ask that you direct staff to conduct the necessary actions to take -- to develop an environmental impact report.

Furthermore it needs to be peer reviewed. And that review disclosed.

Thank you for your time and consideration.

THE CLERK: After Mr. Nunez is David Wade.

MIKE NUNEZ: Hello good evening folks. Thank you for hosting this again.

Just very quick. We're here -- we're here on the a second time basis. The first time basis, people behind us thought they were very confident in demonstrating their -- their project. And I think they were wrong.

What's happened since -- actually, a few things happened since.

We kind of discovered that very little benefit -- financial benefit was going to be going to

I-32

Upland; so they decided to start throwing money around and, you know, and try to get a favorable view of the project.

But it's striking that we still do not know who the lease person or the lease company that will be going.

I think that's very, very wrong to not tell the City who going to be leasing 55 acres of property on our west end when there's houses around there.

And they still refuse to this date to tell

us who it is.

We all have an idea at this point.

But the main point I wanted to make was the traffic study. Who in this room believes that there is zero impact on this traffic study? That's -- that's very evident.

Yeah.

And I'd like to know if our police department was involved in this study since they hold the statistics particulars on traffic enforcement, on traffic citation, traffic collisions, were they involved?

I think corroboration between a police department and a developer is warranted at this

I-32 cont.

point.

Give our chiefs -- we all hold this -- we hold our chief in high regard in this city; so he's a voice that most of us will probably listen to. If he tells us it's going to be okay, we're probably going to be okay.

So why not involve our police chef?

So going back to the developer again, you know, I understand what's going -- you know, money going to the schools and money going for road repairs finally because I believe they initially said they were not going to live us for road repairs

Why in the world is our Upland chamber receiving $50,000 from the developer when they should be leading the front against this project because they're going to kill every single small business in this town?

So that answer needs to be answered. Why is our chamber involved in this?

I-32 cont.

Thank you.

THE CLERK: After Mr. Wade is Chris Garcia.

DAVID WADE: Good evening, council, Planning Commission.

I'd like to -- somebody mentioned 1,100 vans going out, coming back. I don't know how many times a day, but going out and coming back is 2,200 trips.

We have, if they come back a couple times, 3,300, 4,400. We don't need this kind of traffic running through here. We've already got two-hour

I-33

delivery from Amazon, why do we need it here to be supporting other cities when we don't make any sales tax, local sales tax off it?

It is ridiculous.

And I'd also like to point out the zoning issue. Industrial zoning does not state anywhere anything about having a distribution hub or a -- or a terminal facility in it, nor does the commercial zoning for Upland.

All of these other cities mentioned have it, which leads me to believe that our Planning Commission has not been doing a proper job in updating our codes, updating our General Plan.

This is why we need to have term limits and we need to have a fresh perspective in here and to stay on top of this.

I don't see any benefit from -- from something that's not zoned properly that's going to overburden our roads. You put apartments on Central

I-33 cont.

Avenue and now you want to run semis right by them. It's ridiculous. It's ridiculous.

You're going to be crossing Foothill. We don't -- this isn't what we need.

Show me an Amazon distribution center anywhere on Foothill Boulevard? You won't find one. And there's a reason for it. It's not the proper place to be in our commercial corridor.

We need to have proper studies and we need to have a Planning Commission that's willing to represent us.

It is not about progress, it is not about the best wishes of the community, it's the best use of that land.

Is this really the best use of that land? No local tax, all of these environmental issues and more traffic than I even care to try to imagine per day. It's not a good idea.

I-33 cont.

Thank you for your time.

THE CLERK: After Chris Garcia is Lucy Humbolt.

CHRIS GARCIA: Good evening everyone my name is Chris Garcia, a local resident of Upland, 14 years.

What I have a reference -- kind of the same nature of conversations everyone has been kind of

I-34

already entering is some of the traffic and some of the congestion -- some of the congestion and the traffic that's been projected for the project.

It looks like from the initial study for reference, I have a map here, and from the project obviously the 13th Street looks to see the access area for the vans that's possibly employees and distribution for the vans. Their goods. It looks like it's 2,400 possibly vans that are going to be participating in the -- in the delivery. And from reference from some of the initial study it looks like there's an apple shift, obviously it's 2,400, that would be you know 600 divided by four, a concentration of AM shift, a PM shift for 600 hundred, the difference being 1,200.

With that amount of traffic being congested in the streets you have know there would be definitely some I think initial studies of how congested some of the streetlights would be.

But -- and the initial study it doesn't seem like there's a lot of data within those studies, like some of the streetlights it shows reference of barely being a couple seconds later in wait times in those perimeters parameters such as you know the mash the

I-34 cont.

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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.

you no he that could be a little more clarity for all of us to understand.

I-34 cont.

Thanks.

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THE CLERK: After Ms. Humbolt is Bridget James.

LIBBY HUMMEL: Good evening. I am extremely opposed to the biggest development project effort. It is not a proper location for an Amazon facility due to its location and residential area. I am --

We also have emergency services directly across the street from the proposed location. This is the fire department on and the police department on 16th Street.

We all know that time is of the essence in a life and death situation since this is a residential area our quality of life will be affected by traffic, noise and pollution.

This will come from trucks, vans, autos, airplanes and in the future goes with the bus noise. Furthermore our property needs -- our property will depreciate along with our health.

I have a suspicion -- I have a suspicion that our voting rights were taken unconstitutionally

I-35

I believe two years ago in District 21, about the time this was started. To date we still don't have any representation on the council.

The least the City and its representatives 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

But if you just say no, then nothing happens.

We live in a capitalistic society, if we do not grow we die. We cannot live off of home tax base only.

Retail is -- doesn't have the strong foot hold that it used to have. We have to move into different kinds of commerce. ECommerce is strong.

I-36 cont.

ECommerce is also making break and mortar stores. Why not put into the contract that there has to be a small brick and mortar component to it so there's point of sales.

Continue the negotiations. Why can't you negotiate in this contract some kind of point of sale distribution with whatever goes on, anything that's delivered in Upland, something, but if you just say no, nothing happens.

We need to move forward. We already know we don't have to worry about 13th Street because that's been taken off the list. We know that there's going to be road he shall use. All right. So we can plan ahead for that.

We've got to find a way that we can get a continued refer knew stream from this. There certainly has to be a way.

A lot of the community is asking for an EIR, then let's do it because that will answer some people's concerns.

If that's going to be one of the deciding factors, because a lot of people in here are worried about the environment. We also have to worry about the economics and the young families who are trying

I-36 cont.

to make a living and to move up.

I've talked to a few Amazon employees and it's not really as bad as anyone says. Are there companies things that are bad. Yes. And I get it. There's bad health care, there's bad but there's good too. But we have to negotiate. If you keep saying no, no, nothing happens. We've got to move forwards.

Let's look at the concerns they have. Bridge has been open and they've been listening to all ever these concerns. I think they will continue to do so.

I would also like to add is that no one is talking about the family that owns the property. The Giovannis have a say in this. This is their private property and to a certain extent they can do what they want with I find it very interesting that primarily a Republican audience which is all about my property, I get to do what I want, gets to regulate somebody. I don't think the Giovannis want to have brick-and-mortar stores or maybe they do, maybe they don't.

I'm not saying it's right and I'm not saying it's wrong, I'm saying don't encloses the door. Keep the door open and start looking at all of those

I-36 cont.

concerns and work with Bridge and work with the family and see what can be worked out. Thanks you.

THE CLERK: After Ms. Contrares is Bob Cable.

CHARLENE CONTRARES: Hi there my name is Charlene Contrares, I'm a resident on 16th and Benson. I am also a -- an environmental specialist with the LA County Department of Public Health; certified and fully to speak on health impacts of this project.

What I wanted to bring to your attention was

I-37

while Bridge did identify a good buffer around -- for noisy want to speak on the noise, a buffer around the project site, their project does also include the fleet.

And so the fleet and the routes that are traveled on, there is not a good buffer between the routes and the residential -- the residential zones that are along those routes.

The -- as you heard from other people before you, the traffic study seems to be flawed and it's the basis for which the noise, the air and the greenhouse gas models were developed as well; so if you have the foundation data not correct, then the rest of the other studies are not going to be correct as well. And just so you know, looking at the noise

I-37 cont.

study, they did capture -- they did capture actual noise measurements but only four of them. And there are two areas where one was models and one was actual, it was a 10 decibel difference. And so while that may not mean anything, CEQA says if there's a significant impact above 5 decibels then that is a

significant impact; so the health -- the noise study did say there was a significant impact.

However when we look at the model and we look at the actual, there is a 10 decibel difference; so I just want further evaluation into that.

In addition, the nighttime noise was not captured. And so if it's a 24/7 operation, then the nighttime noise at the residential area should be captured.

Also inside the homes shall I know that the City of Upland does have strict code enforcement on noise. And so there is -- there is laws in there that say the residential area has to be at 45. And so it's very important that the model be taken at the residential area because noise is a significant health impact, especially when you're trying to sleep. And you hear horns and you hear all of this noise.

I-37 cont.

So lastly what I just wanted to say is I want to urge you to go through with a full EIR because if we can't identify the impacts then we will never get the opportunity to litigate them and then

you just have to live with them.

And so that's why I'm here, to just help -- help you in any way because I think we all need to be -- we need to make informed decision.

I-37 cont.

Thank you.

THE CLERK: After Mr. Cable is Carlos Garcia.

BOB CABLE: Well, good evening, Mayor, City Council, Planning Commission members, Airport Land Use Commission and Staff, we've got a full house today don't we.

Well, I'm here as you obviously know is to support this project and of course my name is Bob Cable and my family has been on owning the cable airport for just about 75 years now. So when we talk about change, we've seen a lot of change when we first built the airport here there was nothing around here but orange groves so for people to think that life isn't going to change and technology is not going to change the way we live, I can tell you you're wrong.

I-38

And I've seen it lap and I've seen it happen

over and over again. And I'm excited about Upland going being on the cutting edge of this change once, just once.

We -- we broke a developer that tried to get the colonies in the first time. We had a ton of opposition for the second time and it still went in.

And it's a great asset to the community and to the citizens of Upland and our surrounding community.

So to say that I'm associated or the City is associated with -- with a cutting edge Amazon retail/quick delivery service, I'm excited about that.

It's nice to be on the cutting edge now and then and it's nice to be recognized for something that -- that nobody else has.

So I would urge you to take a good hard look about what brings people to the City of Upland because I'll ask them, what do you hear? Crickets? And I'll find 20 who say you know what people come to the City of Upland because we've got the cutting edge Amazon center here. I'm cool with that. I'm totally 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.

Thank you.

THE CLERK: After Mr. Garcia is Terry Deed.

I-38
cont.

25 CARLOS GARCIA: Good evening council, Planning

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

50 million dollars, it's nothing. By the time it hits that bank, it's already spent.

Are we talking about -- I was -- are we

talking about our retirement plan and -- it's not going to do anything for it, right?

So what Ms. James also said about not keeping the door open I agree with her on that. If we're going to negotiate, let's negotiate for the better of Upland.

We keep crying that we don't have money we don't have money we don't have money but the other thing I'm also here is that we're afraid of being sued.

Well, we pay our attorney half a million dollars to cover, right, so why not put that to work.

I-39 cont.

Thank you.

THE CLERK: After Terry D is Alonzo Seldfar.

TERRY D.: Hello. Can everybody hear me?

Okay. Thank you.

I had an opportunity to attend a human trafficking conference this week, last sat; so what

I-40

I'm not hearing being said tonight is what's going to come in on the trucks and vans.

A speaker asked the question, where does this kind of activity take place? People responded, dizzy knee land, the Rose Parade.

If any type of a big event.

I-40 cont.

Why? Around Disneyland, the area around it, the traffic. You have people coming from other states and other countries; so --

Then she asked let's bring if closer to home. Where else do you think bad things happen?

Nobody responded.

She said think about this. High density housing and traffic. We have a lot of big vehicles, a lot of vehicles, no matter what size. What that welcomes in is prostitution and human trafficking, drug car tells.

On this flier that those there was a young man handing out as we came in there was a dollar amount that was supposed to go directly to the police department. That dollar amount needs to be increased to five times that amount.

The prostitution, child trafficking, the fight against the drug car tells, they're going to out number the police department just like that.

What's down the street from this location? The nude dancing whatever you want to call it. That's a perfect prime location for such activity.

Today in the news there was talk about the City of Pomona dedicating two full-time officers to

I-40 cont.

walk the boulevard. Why? To combat prostitution and human trafficking.

The age for human trafficking starts at the age of 12. This human is sold to different gangs throughout our region.

Drugs are a one-time hit, it comes and goes, but a 12 year old human can be sold and resold and resold. You don't until they can no longer perform, then they're took to the side of the road or they're killed.

Is that what each and every one of you want to bring to this community?

If so, know that you own this. Okay?

THE CLERK: After Mr. Seldfar is Marjorie Michaels.

ALUNZO ZALDIVAR: Good evening, City Councilmembers and Mayor Stone. My name is Alonzo Selfar, I'm a 28-year resident here in Upland and currently a senior at the University of Southern California Marshal school of business.

I'm excited to be here tonight to voice my opinion in strong disagreement on the desired permission Amazon is currently trying to get in an effort to place a 5-acre distribution plant in a city

I-41

that I grew up --

50. I'm sorry. 50. Makes it even worse.

In a city that I grew up never seeing as a commercial hub, I'd like to begin to remind Councilmembers that this decision that lies before them is very important and it should be taken with an in a finite view, not so much a finite one.

And I can imagine how easy it is for us to get caught up in the glamor that Amazon has promised regarding jobs, increasing consumer spending and especially the use of unused land that kind much has

created a sore as I'm driving down Foothill.

But according to Amazon's 2018 income statement they've spent roughly 28 billion in research and development and throughout the years it's grown enormously. Just year over year, 27.48 percent and 2016, 79.28 percent.

Now, what this means is all they do promise to provide us jobs in this distribution plant that I'm sure will provide many, I think it's very short-term. And as many people here have spoken about the -- the change that we've seen before us and it's -- it's rapid. And before we know it, we're going to have an empty -- completely you autonomous

I-41 cont.

distribution plant that provides no benefit to our city.

You know, as an avid businessman this is a really good model, I'm not going to lie to you, but as a citizen of a city that I truly love, I really don't see it benefiting us in the future.

So unless Amazon is fully committed to increasing the quality of life of our great city,

whether that be creating a supporting community fund that improves our roads and schools, will I be against this motion until that is.

And so that is, that is all I got. Thank you so much. And -- and yeah, is love Upland, I really do.

I-41 cont.

THE CLERK: Next is Marjorie Michaels.

MARJORIE MIKELS: Hello. Marjorie Michaels.

And my family has been here almost 100 years. And so I was here with the airport came in and. It's --

You know it's significant, I haven't heard anybody talk about the fact that Amazon always locates near airports. They're trying to locate over at Norton where the largest plutonium pit probably in the world is over there and, you know, they're going

I-42

to subject people to it.

But what -- it is inconceivable to me that Amazon is touting this as a prototype. There's not going to be any drones and other things to use that airport to bring in goods and so forth.

And we haven't talked about how much that's

going to increase, you know, the the burden on -- on our city.

And then I -- I have to second what Ms. Terry said about the human trafficking.

Now, we all remember when Steven Dunn left here as the City manager and got taken in by Bob -- by -- sorry, Bob Cable over there and then got his campaign for City Council supported by Welke, the big marijuana guy who was trying to push in all the marijuana and who owns all the T&A outfits that are right next door to this airport.

At the time when we know this Sonoma -- Sonola, what is that, gang from Mexico is bringing in pot and other stuff to the airport, you know, for distribution through well key's outfits and so forth, while the City is spending a million dollars to fight the only guy who was trying to --

I mean you know we have a -- a history here.

I-42 cont.

Right? And we're putting this gateway of our city, we're going to put an Amazon distribution center right next door to the T&A. I know it's in the

county and you can't control it but -- but we don't all know what is going to be permitted and distributed at our front door. Okay? Front door from Claremont.

They're not asking to go to Claremont, they're asking to come to up grand, the gracious city because -- maybe they just don't like you guys to be scared I have a feeling Mr. Zimmerman has been fed a line that this is zoned for this and so you don't have any right to do this and so they might sue us and that would be horrible.

Well, we know how Amazon treats people, they know how they spent over a million dollar dollars to get rid of a City Councilwoman in Seattle who was trying to help -- to get the largest corporations in the world, we know Jeff Bezos is the richest guy in the world, okay, to try to get them and Starbucks and Boeing, you know, to kick in some money to get rid of the homeless.

They fought that tooth and snail. And Amazon spent a million dollars to get rid of that one

I-42
cont.

council woman and they lost. Okay. They lost.

Because the people knew better.

And you've got a lot of people out here tonight and you need to listen to them and we need to go for an EIR, okay, and -- you say oh, we don't have time, we have to get this in by next August or -- or else it just won't work, and -- and Amazon needs to step up to the plate. Okay? They won't even come and sign the contracts that you're going to true try to impose them.

I-42 cont.

MAYOR STONE: Thank you Marjorie, your time is up.

Thank you.

THE CLERK: I don't have any additional cards.

MAYOR STONE: All right. Thank you very much and thank everyone for your time and your comment.

Now I will turn it turnover the --

Okay. I'm sorry, but I'm being kind of asked up here, we're going to take a five-minute break. We'll be right back.

(Off the record.)

MAYOR STONE: All right. Keri? Keri? Keri? Turn my microscope on. If I --

Keri? Keri? Can you turn me on? Hello?

UNOFFICIAL UNCERTIFIED REALTIME ROUGH DRAFT TRANSCRIPT

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

questions you may have on the study.

The public review period began on December

16, 2019 and is due to end on January 21, 20230.

This provides for a public review period of about 37 days which exceeds the minimum public review period following the negative mitigated declaration, which is 30 days; however 30 days is required if a document is --

Which this document was received, the City has received 22 comments thus far on the environmental document. After the public review period is over staff will work with Kimley-Horn to prepare responses to each of the comments that were received from the public. This will be included in the materials to provided to the Planning Commission and the City Council in the public hearing process. And will also be sent to each of the -- the individuals that provided a letter 10 days before the public hearing.

The negative mitigated declaration reflects the independent judgment of the City, who is responsible for every agency of the adequacy of the

objectivity of the CEQA quality.

With that, I will turn if over to Kimley-Horn who will he provide a presentation.

MR. FLOWERS: Good evening, Madam Mayor.

Before the Kimley-Horn representative begins I would just like to remind the Commission and the Council that since this is a special meeting under the Brown Act, your discussion is strictly limited to matters on the agenda and the only item on the agenda for your discussion tonight is the initial study and mitigated neg dec; so this is --

I'm just giving you some pointers that this is not about the ultimate merits of the project, about whether or not to approve it, and it's not about the proposed development agreement or those deal terms. Those matters are not on the agenda tonight so they're not open for your discussion.

This workshop was called to discussed environmental review and that's what we're -- the discussion should be limited to.

MAYOR STONE: Thank you very much, I appreciate

the information.

All right. Go right ahead.

MS. BURNETT: All right. Thank you.

Good evening Mayor, members of the City Council, members of the Planning Commission and chair, and members of the Airport Land Use Committee. My name is Candace Burnett and I'm a planner with

Kimley-Horn.

We are the consulting firm that prepared the environmental document which is the mitigated negative declaration in partnership with other consulting firms that prepared portions of the technical studies.

The mitigated negative declaration comprehensive environmental document that is available for review and the workshop tonight is an opportunity for us to provide you as well as the public an opportunity to not only review but understand the process in which we evaluated the project.

The mitigated negative declaration is currently on line, it's available at your public

counter as well as we have a copy here tonight. I -- I see that you all have copies as well. It's quite a large volume and so we will refer to it as well tonight.

Tonight we will also cover the preparation of the mitigated negative declaration, the public review period and the next steps.

The CEQA process is a methodical evaluation procedure in which each impact section is evaluated

for a project. The process includes technical studies as well as professional level environmental studies.

The Bridge Point Upland project is a 2 hundred thousand square foot building located on an approximately 50-acre site. The site is currently eyed as depression activities as part of Upland lock. The proposed building occupies approximately 10 percent of the site and is proposed a s a as last-mile type warehouse storage facility.

In the Upland Claremont and Montclair area, the facility also may include a retail will call type

pick up location that would serve the retail -- the residents as well as the location -- general location around it.

The adjacent uses include industrial, park and warehousing to the west, the Cable Airport to the north, Lowe's and small retail as well as restaurant shops to the east and immediately south restaurant as well as retail and further south an across Foothill Boulevard additional industrial and retail sales.

Additionally the site has been designed for clean energy efficient vehicle operations to accommodate a fully electric fleet of delivery vans

as the infrastructure would be included in future build out. *

Kimley-Horn is a full service environmental and engineering consulting firm providing series advises to the clients nation wide. It was founded in 1967 and has a staff of over 4200 professionals and offices nationwide. We have experienced planners and environmental analysts working with interdisciplinary teams in more than 400 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

familiar with your city as well as the Cable Airport and appropriate land uses and the types of zoning.

Kimley-Horn is also very familiar with airport development as we have a strong aviation team in-house with -- with helping many airports in the Inland Empire.

The purpose of tonight's joint workshop is to share with you and the public the process of the environmental review and throughout our technical evaluation of the project and how we evaluated the project.

It is also to gather the type of information, the comments we receive tonight and any additional comments from you.

All of those formal comments will be received and incorporated into the final document.

The other thing that we wanted to point out,

that tonight is just a workshop, that no formal decision will be made by any of the policy makers.

Also, that this is the third workshop, that the applicant held two additional workshops with not only the City Council and the planning anything but

the airport land use committee, and that based on feedback the project has been redesigned to have a smaller footprint but tonight the workshop is primarily to discuss the mitigated negative declaration.

The mitigated negative declaration is out for CERCLA ration for public review until January 21st of 2020. It was released by the City on December 16th and is required to be circulated for a minimum of 20 days but because the City decided to circulate it to the state clearing house, it was required to go for 30 days of circulation.

It was extended for the 37 days which was longer than required, to accommodate for additional holidays and to allow for adequate time for review. Additionally, we did -- although not required, we will be responding formally to every response received from the public as well as any agencies and also any policy makers.

Again, copies of the mitigated negative declaration are available online on the website as

well as at your city hall planning counter and tonight for review if anybody is interested in reviewing it. And it will be available until January 21, 2020 for comment.

We will be responding to every comment.

So CEQA determines thresholds of significance to evaluate a project against. Those significant thresholds are identified threw a quantitative, qualitative or performance level evaluation of environmental effects. The project is evaluated to be determined if it may cause an impact to the environment. The lead agency may determine if those impacts can be mitigated to a level of less than significance. And if so, they may consider processing and adopting a negative declaration or a mitigated negative declaration.

If the lead agency prepares the environmental document for the project, they must utilize the regional, state and federal standards for each topic area under CEQA.

If it's determined that there is no impact and that there are no thresholds exceeded, then per

the guidelines they prepare a mitigated N deck for the project.

This is the same process for an EIR but then an EIR generally has significant impacts or sometimes impacts that cannot be Milt gated.

When environmental analysis is prepared to analyze all potential impacts. Generally when occurs when the technical studies that are prepared by professionals in those fields to determine if the project has specific recall packets.

There are 20 environmental factors that are included study aesthetics, GHG, hydrology, noise and others that you heard tonight. After all of these different impact areas are studied, a determination is made whether that project has an impact on those study areas.

Again, these studies are performed by technical experts in these areas and are evaluated by the federal, state and local standards, guidelines rules and regulations.

So how are these impacts determined?

If there are no adverse impacts determined, then the project can be determined less than significant and a mitigated negative declaration can

be prepared and adopted for the project.

If there are clearly no significant effects on an environment, they also can prepare a negative declaration for the project.

The same level of comprehensive analysis is performed for both a mitigated negative declaration and an EIR. An EIR is warranted when a significant impact from the project is determined based on the studies and the technical evasion evaluations prepared for that project, or if the significant impacts can not be mitigated.

Once the document is prepared for the project, the document is circulated for the public review, and that is the process that we're currently in.

So why a mitigated negative declaration and not an EIR?

Based on thorough evaluation prepared by the technical experts who performed the studies on all of those 20 environmental factors studied for this project, it was determined that the technical and

lead agency found that no significant impact would be -- that would occur from this project based on the proposal. And that all studied areas could either be

mitigated to a level of less than signature or those environmental areas had no impact.

The Bridge point Upland project is consistent with the General Plan designation and the zoning for the site. Additionally, it is consistent with the Cable Airport Land Use Plan.

The zoning allows for the proposed use with a last mile warehouse type service building in the Upland and surrounding community. And it is significantly set back from the street and located on a large parcel of similar scale to industrial development in the general area.

The warehouse parcel is -- generally results in fewer employees and visitors to the retail and commercial or residential uses and it is consistent with the airport plan as it reduces potential noise and safety impacts to a larger population consistent with the compatible criteria chapter --

MAYOR STONE: Excuse me just a moment, I'm

sorry.

If you guys are going to leave, if you could please leave quietly to not disrupt the neating meeting.

And Mr. Wade and Mr. Patterson we need for

you to keep it down you are. You're interrupting.

Thank you.

For those of you standing in the back, if you'd like to come forward and have a seat you may do so.

I'm sorry for the interruption. Please go ahead.

MS. BURNETT: Thank you.

Additionally, based on the traffic study prepared for the project, the project would generate minimal number of trips from the site that would access the project site, primarily overnight with a maximum of five daytime trips.

The project would not create an I'm fact to air quality as identified in the mitigated negative declaration and the technical studies provided in the

appendices.

And the project would not include transportation or use of -- of hazardous materials.

Additionally, the mitigated negative declaration and the technical studies prepared for the Bridge Point Upland project overanalyzed a larger footprint and this was based on comments from the previous workshop.

Originally the studies prepared were for a much larger footprint of 270,000 square-foot building prior to it being reduced in size. The building was reduced in size to 75 -- an additional 75,000 square feet or 35 percent.

The 20 environmental areas studied were based on the 20 studied areas per the guidelines of CEQA and more than 1800 pages of environmental analysis including the technical studies are all included in the volume.

28 mitigation measures and project design features are included to reduce those impacts.

The project was determined to have a less than significant impact for 13 of the 20

environmental studied areas. This means that the project as designed would meet thresholds for and of the study areas and would not require any mitigation to reduce the level of impact which would require an EIR.

Technical studies were performed for the necessary environmental study areas to determine the level of impact on the environment.

The project was determined to have less than a significant impact with mitigation for seven of the

20 environmental areas. Again technical studies were prepared for these environmental areas as well to determine their significance as well as appropriate mitigation measures to mitigate the areas for less than significance.

The technical appendices that were referred to are identified here for the project were performed by -- for the Bridge Point Upland project. The thorough evaluation by subject matter experts, engineers and professionals were prepared for a comprehensive set of thorough evaluations for each

environmental impact area to study all impacts of the project. And it demonstrated that the project met the requirements of CEQA.

Additionally, we identified a few of the key areas that we've heard through either public comments or through the workshops that were areas that were key to the public for concerns and we're bringing those up tonight to discuss in further detail including items identified here tonight which are the transportation, air, noise, hydrology, land use and aesthetics.

First traffic and transportation was a topic that we heard as a public person concern. Based on

the input a traffic impact analysis was prepared for the project in consultation with city staff.

The traffic impact analysis was prepared in accordance with the requirements of the SB county management program and the analysis -- and analyzed traffic concerns for the scenarios relating to existing conditions as well as project conditions with the opening year of construction. It also analyzed the 2040 conditions and project conditions

of the project year, 2040.

The project impact analysis also evaluated potential impacts at 17 intersections including within the City of Claremont and Montclair and all intersections there was potential for impact to occur based on increased traffic levels for additional movement and trips leaving the site. The traffic engineers are here tonight and based on comments received they can respond to those comments.

Additionally at previous workshops and project review there was concerns from the public regarding possible sites leaving the site from 13th Street. Based on those comments received from the public truck movement was a concern from 13th and based on that, we wanted to recognize through this

exhibit that it has been removed as a potential access point and that all truck trips would be relocated through central and Foothill leaving the site; so this is just a -- just to reiterate that we do understand that is a concern of the public.

Additionally, the traffic impact analyzed

trips from trucks, vans, employees and visitors based on the analysis the project would generate far fewer trucks compared to existing conditions. A total of 25 trips -- trucks would leave -- would access the project site primarily overnight with a maximum of five trucks during the daytime hours, resulting in a significant reduction ever daytime trucks.

Peak hour trips less than five percent on Foothill, 2 percent on Benson and 1 hers on Baseline Road.

As determined from the traffic study and with the collusion of the mitigation measures, less than significant impacts at all intersections would occur. The project will be required to find a fair share contribution to the circulation improvements at Benson and Baseline.

It was determined that the circulation improvements of the project would have less than a

significant impact and it was an incorporated into the mitigation measure as shown here.

Additional there was a level of comment. One of the things that we did want to know is that

the VMT is not a required analysis at this time under CEQA and that the level of service does measure congestion and the delays in traffic and therefore that was the appropriate analysis at this time.

The table is provided as a comparison between proposed project for wire houses and retail uses. And what it shows is that the project he proposed project would generate generally less than a third of the trips as the same retail size building on the site. Retail uses would also have to accommodate large trips, bearing deliveries as well as parcels and employees.

Air quality was also another concern of the public. Air quality study prepared for the site established health protective thresholds for project emissions. Based on the study prepared project -- all emissions were shown below the South Coast Air Quality management district thresholds and the project was determined to be less than significant.

Additionally, the air quality study prepared

for the project identified appropriate mitigation

measures to reduce impacts. Some of those measures were included in the infrastructure improvements that would include items such as installing electric vehicle charging infrastructure are future 6 percent of the vehicle parking spaces, limiting truck idling to 5 limits and that service equipment including things like forklifts and yard trucks would be electric or natural gas.

Another concern was noise. Noise is evaluated for a project based on short-term and long term construction, as well as operational noise.

And noise and vibration study was prepared for the project and based on our comprehensive study it was determined that the project design features would include -- would address those noise impacts.

Features would include items such as construction equipment with min Muzing mufflers, noise minimizing mufflers, signage that would go out to the neighbors to let them know of the timing for construction, which would include construction schedules and start times, and all that have would be in compliance with your Upland Municipal Code.

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.

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.

Land use was also another area of concern and whether it met the zoning requirement.

An aerial of the site shows as you can see

that it's made up of primarily and commercial zoning district and use. The site is currently soaped as commercial industrial and mixed use. And and is surrounded by similar zoning uses and designations. The proposed use is consistent with the underlying zoning as well as General Plan and Airport Land Use Compatibility Plan.

The proposal is low density in terms of the type of use and -- as well as the number of employees and visitors; therefore, it is appropriate in terms of your airport compatibility plan as well as it would limit of type of intensity of development around the airport and suppose sewer to sensitive receptors to the airport.

The project is adjacent to the air -- the Cable Airport and therefore is within the Airport Compatibility and Airport Land Use Plan. The project must comply with the Airport Compatibility Component

of the plan which means that it must -- the project must knit within the zoning allowed under those uses and the intensity of the number that of people that would occupy the area and capacity zones.

The proposed parcel is within the proposed airport is C1, Y2 and compatible zones and the

building is within the C2 and C3 zones only. The project structure is consistent with the allowable uses of the C2 and C3 zones as the structures are proposed in the C1 zone. It will generally result in, and it's therefore most compatible with your airport compatibility.

It also is noise and safety impacts -- it's a reduction in noise and safety impacts as it has a lower population.

The last impact area that we wanted to cover was aesthetics.

The project was designed to meet your city standards for all set backs, lot and original design requirements and in fact will exceed most of those standards.

The building will cover less than 10 percent

of the total site area and have 11 acres ever landscaping that will serve as screening on all four sides.

Building must meet the height limits of airport compatibility requirements and would be set back from Foothill Boulevard a substantial distance.

In fact, the building will be set back more than 700 feet from Foothill Boulevard which is about

2 and a half football fields for perspective.

The building will be substantially screened from Foothill by over 1,000 trees and by the -- the buildings along Foothill Boulevard which are the retail and commercial type comments tenants.

The next step in the process is that the mitigated negative declaration will close on January 21, 2020 for public comments and those comments can be provided through comment cards tonight.

The comments that we received from the public tonight as well as provided in email or in writing to the contract planning manager, as well as

by responding to Kimley-Horn.

The other thing is we did collect those comments in right writing and will be respond information formal -- in the formal response to comment process.

We also have a consulting team here tonight who can respond to specific questions that were brought up as he will. And so if there's also questions of the City Council, Planning Commission and Airport Land Use Committee that we can respond to, here happy to take those.

Additionally, if there are documents that anyone wants to provide to us, we are willing to review those documents and respond to them as well.

I know that quite a few members of the public mentioned that they do have studies or technical documents and so we would like to have them provided to us and we are more than willing to review them and o accept them, to respond to them as well. So thank you.

MAYOR STONE: Great. Thank you very much. Appreciate the presentation.

So at this time I'm going to ask Councilmembers or Commissioners if anyone has any statements or comments. Okay.

Robin, go ahead.

COMMISSION CHAIR ASPINALL: First, can you tell me if you --

I think you covered this earlier but are you with the --

MS. BURNETT: Yes, we are.

COMMISSION CHAIR ASPINALL: And do you have any intention prior to making comments based on what you get in writing, the comments you get in writing to respond to any of the accusations of inaccuracy or

LA-1

inadequacy in your studies.

MS. BURNETT: Prior to we would review --

COMMISSION CHAIR ASPINALL: You would do that through the comment process?

MS. BURNETT: Correct.

COMMISSION CHAIR ASPINALL: Okay. So we need to go back to the map of the project.

LA-2

You'll recall in the northwest corners

that's kind of lobbed off, there's sort of a -- if you -- if you look at your sort of map of the project? Yeah. It looks like it overlaps the runway, I'm not sure.

Is that intentionally done because it's in the zone? Do you know --

MS. BURNETT: On the land use compatibility plan?

COMMISSION CHAIR ASPINALL: Right.

Do you know which one?

FLOWERS/DALQUEST: Commissioner, that's an existing commission in this project between the airport owner and the property owner, that would be corrected and this property would either -- I believe and Bridge can also answer that, would be deeded over to the airport.

LA-2 cont.

COMMISSION CHAIR ASPINALL: Okay. So it would be cleared up in the sense of the homeless situation because it still looks like there's a pocket there that could be a problem.

Okay. Thank you.

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.

So on the permeable pavement, we're presently opened to it. It's not currently designed as part of the project.

In terms of actually going down to the design of the site and the civil design, the hydrology design to capture all waterfall to filter if and then to re- -- to discharge it back into the standard system.

We -- me personally -- I personally and then we have worked with projects that have permeable asphalt, permeable pavement.

Sir, I gave my card to gentleman, I'm certainly interested to here what he has to same.

I thought he spoke kind of eloquently and seemed to be kind of passionate about the project he was considered from so we're going to look into it.

One of the concerns specifically about the last couple of years in terms of the technological ranges with but the original concerns with term limits is it would be kind of like up, flex and wrote -- it would degenerate faster than your

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

generally a try to --

MAYOR STONE: Perfect. Thank you so much.

Councilmember Elliott.

COUNCILMEMBER ELLIOTT: Thank you, Mayor Stone.

And so, first of all, there's lot of us that are new sitting up here and, first of all, this is the largest development project that I have ever made any decisions on and I would really like some -- probably from some staff -- some -- some clarification of this process.

So you're saying that the public hearing is going to be held in February -- I believe it was February 12th, is that correct, that's in front of the Planning Commission?

LA-5

MR. DALQUEST: Yes. We're tentatively scheduling it for the February 12th Planning Commission meeting and that's a public hearing.

COUNCILMEMBER ELLIOTT: And that public hearing is for the Planning Commission to hear what the public wants and has to say with regard to the decision that they will be making on the mitigated 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 --
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-6 cont.

LA-7

Some cities require that the City contract with for the studies and the developer pay, some have the developer pay in contract and those studies are peer reviewed and some of them just let the developer contract with the consultants and then there's no peer review.

Where do we fall in Upland?

LA-7 cont.

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MR. DALQUEST: Well, let's book up and look at -- look at what CEQA says.

Under 15063 of the CEQA guidelines the City as lead agency may choose one of -- one of a number of arrangements or a combination in preparing the initial study.

The initial study is -- is what will determine whether this project is is processed as a mitigated negative declaration or an EIR. One is preparing a draft a -- the initial study directly with its own staff members.

Two, contracting of the availability entity, public or private; so contracting directly with the environmental consult to prepare that.

Three, accepting the draft initial study by

the applicant and consultant retained by the applicant or any other person. And so that is -- that is permitted as well.

Once the document is submitted to the City it becomes our document and then we work with the environmental consultant, staff will review that document, we'll suggest changes and then we'll transmit those to the environmental consultant.

Also -- and then there's other combinations;

so in this instance I think about 18 months ago the developer had indicated to the City that they would like to use Kimley-Horn and at that time staff was well aware of Kimley-Horn, they're a Premier Environmental consulting firm and that was -- that was acknowledged that it would be okay to allow Kimley-Horn to be the environmental consultant on this project.

But it would be like we would give them a list anyway. And so that's how they came on board and became the consultant for the project.

COUNCILMEMBER ELLIOTT: Okay. And in this case

Kimley-Horn was paid by Bridge Development.

MR. DALQUEST: Yes.

COUNCILMEMBER ELLIOTT: And the staff will review it and determine whether or not whether or not some of the studies need to be altered or or redone based on some of the feedback that we've heard; is that correct?

LA-8

MR. DALQUEST: So staff and myself as the project manager, I have 30 years of experience in CEQA project management, project planning has over 30 years experience, we have our city attorney review that. We had engineering review that which is the

City's engineering consultant review that and through that review we suggested certain things to some of the document and now we're satisfied that represents the independent judgment of the City.

COUNCILMEMBER ELLIOTT: Okay. So I spoke with many of the people who came here tonight and I met with them at various places and -- about the technical studies and I don't want to take any time up here to go over them, but I'd like to meet with you, Mr. Dalquest, with these questions and see if

LA-9

perhaps we can iron them out.

One of my big concerns is with regard to the ambiguity of the classic -- the land use classification per the Upland Municipal Code; so so that this project is deemed to be appropriate meets the commercial designation, so that it is allowable to have warehouses. And that was around administrative decision because that's written in our code.

But the term "warehouse" is extremely ambiguous nowadays as we heard from knowledgeable members of our audience that since that was adopted it has change

And so I'd like to direct staff to consider

LA-9 cont.

and research options to update our Upland Municipal Code for future projects on this so that we can have, say, a -- a different level of administration and decision making based on if a warehouse is under 50,000 feet, perhaps that could be just an administrative review for a warehouse is over 50,000 feet, maybe it would require a conditional use

permit.

And then I'd also like staff to look at clarifying the distinction between a warehouse and a distribution center and require a comprehensive report for all facilities over 50,000 feet, square feet.

Does that make sense?

MR. DALQUEST: Yeah.

COUNCILMEMBER ELLIOTT: I have it all written down and I can sent it to you but I'd like to make this really clear future projects because this is extremely ambiguous in our Municipal Code and I want to avoid any future problems with this.

MR. DALQUEST: I understand this.

But just we'd like to suggest that base on staff's review and the City attorney's review this falls within the definition under warehousing also

LA-9 cont.

land use which are also permitted uses.

But we can talk to you about -- I'll suggest it to you.

COUNCILMEMBER ELLIOTT: I would love to do that.

My -- will the airport be used at all for

LA-10

distributing?

MS. BURNETT: Yes.

COUNCILMEMBER ELLIOTT: Will the airport at all be used for distributing in anyways in the projected future?

LA-10 cont.

MR. KOTLER: Not that we have had any discussion, knowledge, the short answer is no, like it's not that type of airport like there are large kind of commercial freight airports offices we've seen --

COUNCILMEMBER ELLIOTT: Yes, there is a private -- little planes.

MR. KOTLER: Yes. Little planes.

Short answer is no. There's no connectivity between the site and the airport.

Again, part of that is just me saying there's no connectivity, part that have is the actual project design. There's no connectivity.

Again, I certainly suggest that any one who

has any cures yacht, either public or up on the dais to go and drive it. The site sits quite a bit lower

than the airport itself so there's no --

Not only is there no physical design connect difficulty, there's no physical connectivity in general once we grade the project to make it useful for our needs.

COUNCILMEMBER ELLIOTT: And what about drone projects, are those protected at all in the future?

LA-11

MR. KOTLER: Not at all.

Again -- and I'm happy to commit that anything -- I'm not an expert in the City Code, I don't even think they're allowed but we can certainly include in any sort of project condition that any sort of flying apparatus that would ever come to this site would have to go back in front of the administration or governing body to get that use.

That's not a problem.

COUNCILMEMBER ELLIOTT: I appreciate that now --

MR. KOTLER: Just --

Sorry, I apologize for interrupting.

COUNCILMEMBER ELLIOTT: Please. No.

MR. KOTLER: Typically up the don't see drones 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.

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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.

some kind of a penalty to -- to -- for these kinds ever violations.

LA-13 cont.

MR. KOTLER: 100 percent.

And just to add a little bit more to that because I think it's a very fair concern.

You know, this is our -- this is our third time in front of you all as group, there will hopefully be a couple more so we'll be seeing all the same --

Long story short, on -- on being able to kind of hold us to account to what we've committed to you guys and I think we've made a lot of commitments and a lot of concessions but I still think it comes down to kind of a prove it or who's going to be responsible more importantly to enforce it and I know there's concern about dedicating city staff, even though the City does have a code enforcement I division shall we're more than happy to contribute financially to the City to basically give the City the extra funds that needs to make that you are that it can monitor this site to make sure that we comply with all conditions now in the future.

COUNCILMEMBER ELLIOTT: Yeah. And I think there seems to be a lot of paranoia but I think you have to understand you're not revealing the tint and so we can't do our due diligence --

LA-14

MR. KOTLER: Sorry.

COUNCILMEMBER ELLIOTT: -- as far as researching what this tenant's employment history is and anything to everybody is kind of wondering here now what's going on.

LA-14 cont.

MR. KOTLER: All fair questions.

And to the extent that in the past we've been accused of being a little bit kind of coy about it.

Let me be explicitly clear. We do not have a signed lease. There is no signed tenant on this project. If and when we have one, it will be made public. But we can't have assigned tenant on a project that doesn't now currently exist.

There has been plenty of talk about it but we can't have -- there -- this isn't a signed tenant.

That being said, every commitment we have

made, every commitment that we will make in the document, in the conditions of approval, in the eventual development agreement, will be equally enforceable against the landowner, the tenant, the developer and anyone else connected to this project.

The name of the tenant and how the tenant acts will not be allowed to be any different than the commitments and conditions that are applied to this

project. It doesn't matter if it's a tenant that exists today, if it -- are -- it doesn't matter if if it's a new tenant, it doesn't matter 25 years from now.

The conditions that are applied to this project and the commitments that we make as part of these conditions of approval, as part of the City's existing code, as part of the development agreement, will be applicable to anyone that occupies and uses the site.

So while I certainly appreciate both the Council's and the Commission's and the Committees and the public concerns about all of these different types of use, the reality is anyone who's on this

site and any design feature of this site needs to comply with the City Code and any other further -- further restrictions be made.

A good point --

I'm sorry for you kind of going off on this but I think it's kind of important.

A good point is the trucks. There are --

I can -- I have not heard of any other project before this really and relatively new Council or Planning Commission or in any past that have been

willing to restrict the trucks below what is has otherwise been studied or --

We are making that commitment based on comments we've heard from the public and the concerns.

That commitment has not only been something we've made publicly but it's been something that we are going to actually include in whatever sort of conditions or development agreement that gets made.

Any violation of that commitment would be a violation against all of the provision, all the

commitments that we've made and there will be -- there will be retribution. There will be -- there will be mechanisms to enforce that.

But to be clear, that's not just us saying it flippantly, it's not just us, oh, it's not saying there's a secret plan to do different trucks, that are a plan with the commitments placed upon this site.

And it's those types of mitigation measures, those types of mitigations that would and that we've still open to making this there are concerns that the Planning Commission, that the Committee, that the Council and that the public have that further need to

restrict this site just to give the piece of mind that the commitments that we've made publicly are enforceability and that the rumors that have been spread about this project can never come to be true.

COUNCILMEMBER ELLIOTT: Thank you for that.

I've got a question about the greenhouse gas mitigation.

One of the features that you have talked about was the EVA chart infrastructure that's going

LA-15

to be provided, I believe that all of the truck bays and at six locations for the passenger cars.

Is that infrastructure only or is that -- are they actually going to have charging stations?

LA-15 cont.

MR. KOTLER: So as ever right now I believe it is infrastructure only, for instance, around the parking areas, the design right now calls for conduit to be placed that such as I think that previously mentioned the entire fleet can be electric when the technology has advanced to that stage.

Whether or not further commitments need to be made, whether or not further design changes need to be made. It's not uncommon, for instance, for projects to ever a minimum amount of publicly available charging stalls need to be included as part

of the project from day one and it's those types of changes and commitments that we're more than happy to make.

One of the things that prevents most large scale development projects from just rolling out with EV chargers everywhere using EV chargers as annex

many, solar is very similar is that the technology changes very quickly that the concern is once you've put it in it will become obsolete and it won't be used.

Nevertheless, if there is a certain amount or location or type or a style that the City feels strongly about that wants to be a part of this project we're certainly open to including that.

COUNCILMEMBER ELLIOTT: Well, one of the -- one of the speakers from the public mentioned that Amazon has got all of these electric vehicles and if there there's any charge station charging station it seems like then that's not really not a benefit for having, even if it's not Amazon, but for having the infrastructure if these vehicles, these vans and the trucks can't actually charge up, then there's really no point --

LA-15 cont.

MR. KOTLER: I totally agree.

But by the same token, I need -- you know, I respect you and I would not be saying this flippantly, there's also no point in including the infrastructure and the equipment if in the end

vehicles don't exist are or not onsite yet. But it's about the time being now ready.

So when you design a project -- you design is a project for the future, the term used is future projecting. Typically any sort of infrastructure need to put below grade that's harder to access you put in there so this when all the technology catches up we are ready to do it.

A good example would be electric trucks, like the big trucks.

COUNCILMEMBER ELLIOTT: Okay.

MR. KOTLER: That is coming.

There are CARB, AQMD, all sorts of different groups looking specifically at that. Unfortunately, the technology is not there but designing warehouses today to accommodate truck charging at the docks; so good practice that is certainly something that needed if needed to be added as a condition of this project we would be more than open to.

COUNCILMEMBER ELLIOTT: Correct. But they do have vans that are EV, so it would be really good to

LA-15 cont.

have the charging station for those vans and reward those drivers if they're contractors for using a zero mission vehicle.

LA-15 cont.

MR. KOTLER: Couldn't agree more.

Happy to include that as a design feature for both vans -- and again -- and any sort of vehicles as well.

COUNCILMEMBER ELLIOTT: I think the rest of my questions are questions that we can work on together off -- off the microphone phone and the cameras.

Thank you very much, Brandon.

Thank you, Robert.

MR. KOTLER: Thank you.

MAYOR STONE: Councilmember Zuniga.

COUNCILMEMBER ZUNIGA: Yes, I have some questions from some residents, a lot of them I'm not going to be able to ask because they don't pertain to this workshop but has there any been -- has there any studies of the new van hub facilities to take into account what may be happening here?

Like Chino and Redlands and all the other locations, has anyone went to those locations to see the potential for Foothill, what we can do -- what

LA-16

2 we're looking at?

LA-16 cont.

3 MR. KOTLER: So I think --

4 We have our traffic engineers here -- or

5 traffic engineers that are independent but that have

6 been hired to analyze this project who I think could

7 come up and speak to that a little bit and then

8 should their answers be deemed -- not to have the

9 full color we're happy to volunteer as well.

10 MR. GIBSON: Good evening. My name is Pat

11 Gibson, I'm with Gibson Transportation, I analyze

12 traffic and civil engineer in the State of

13 California.

14 You know, trip generation the traffic study

15 is based for a parcel partial hub warehouse which is

16 like a FedEx or UPS. Those typically generate more

17 trips.

18 We have -- we have looked at other an

19 some-type projects and we haven't looked at them --

20 at a van hub but we have looked at other Amazon-type

21 facilities and I know the -- and in all Amazon

22 facilities the truck traffic is significantly less

23 than what you would see in also say a -- a Sketchers

24 warehouse or a big box warehouse in terms of accident

25 occurrence, Amazon in terms of more passenger cars

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.

COUNCILMEMBER ZUNIGA: Yes. That -- that would be good.

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

some of the ear facilities that I think have been necessarily mentioned there is sometimes some Kern as to how older sites have been retrofitted or used in kind of modern day facilities; is so I would suggest that this site being built for this use and the use specifically that it studied is more capable and more

ready to handle the exact and specific use that's going studied, that's being mentioned, that is allowable by the zoning code than potentially some older sites in some adjacent cities that are struggling with the progress and changes in the way warehouses are being used.

COUNCILMEMBER ZUNIGA: Okay. Thank you.

Can you get with Brandon afterwards and exchange our -- what we have and what you brought to us, what your traffic -- your issues?

Well, afterwards, please.

FEMALE SPEAKER: Just to clarify with the traffic engineer here for the public --

MAYOR STONE: Okay. We can't have this conversation; so what we'll do is if you can just get together with him --

COUNCILMEMBER ZUNIGA: Thank you.

MAYOR STONE: Okay. Any other questions?

COUNCILMEMBER ZUNIGA: Yeah, I -- I do, I'm sorry.

So at our first workshop we -- when we first got together and presented all of this to us and I remember saying, hey, you know, as long as you supply us with an EIR, I don't see why there would be any

LA-17

problem with this.

And you were pretty sure that an EIR was going to pass -- it would pass an EIR, you had no problem giving that back to us. And then the next time we got together it was time was of the essence and we couldn't get a full EIR. Right? Because --

MR. KOTLER: Yeah. To be --

I mean, I'm happy to go back and look but I think our commitment was -- and I believe to you personally as to several other members up there on the dais is that we believe and still believe that the environmental study that has been done for the this project is comprehensive and covers every single

technical and environmental aspect that would otherwise be covered in the EIR.

To be explicitly clear about this, there is not a sings many particulars any Cal study that would have been studied any differently in an EIR than what was provided.

As Kimley-Horn, as planning staff has laid out, there is a specific process by which a determination is made as to whether a project needs to get an EIR or an MND. In this case, this project being studied using the same standards and technical

analyses that would be in an EIR were shown to ever less than significant impact in 13 different areas and less than significant impact with mitigation in seven different areas.

As a result, because there is no significant impact that couldn't be mitigated to a less than significant level, an MND is the appropriate document in this case.

Once again, there are no technical studies that would be added in addition if this was an EIR. If the public or the Council or the -- or the

committee or the commission have any concerns about the veracity, the comprehensive nose, anything that's in the technical studies, please provide them. We --

I mean, candidly as the Applicant we'd want to have the most robust and comprehensive document. That's why we do that is to make sure -- not only because it's good practice. It's the law.

So if there's comments or concerns, please provide them, we will respond. If things need to be modified because there might have been typos, it's a giant document, we will correct them.

But to be explicitly clear, the same environmental studies and reports and analyses and

standards that would apply in an EIR apply to this document.

When people are requesting an EIR there is no further environmental studies in an EIR than there are in this MND.

COUNCILMEMBER ZUNIGA: So if there --

So if you're saying what you've done was the same as an EIR or pretty close, why didn't you just

LA-17 cont.

do an EIR? LA-17 cont.

MR. KOTLER: So I would say two -- there's two reasons. And I think, you know, it's a fair question, it's a question we obviously anticipated.

The first -- the first question is because it is not necessary for this project. As we said, there is a state provided process by which a -- by which the lead agency decides whether or not an EIR is required.

And to reiterate that process, if there is a significant impact that cannot be mitigated to less than significant levels, then an EIR is provided. In this case there were none and thus a MND is done; so to do an EIR just at basic level would be more than what is required than -- than what is called for by the technical reports.

In addition, the -- the only difference between an EIR and an MND in this case is whether or not alternatives would have been studied to this project. And actually based upon the city's comments and feedback and the public feedback, we are basically proposing an alternative.

If everyone I'm sure remember the first project we had up here was a million square feet spread across three buildings. Given the concerns that were raised over that development, we have gone with an alternative development that has been reduced by over 80 percent in terms of coverage area and 90 percent in terms of trucks.

COUNCILMEMBER ELLIOTT: I have --

Mayor, I've asked if I can ask a question that's directly related to this to our attorney, Steven Flowers.

I asked this earlier and I want to again ask you, does an environmental impact report provide the City more legal defense in the event that there's a lawsuit against the City in the case of some damages in the future from this project? Does it provide more of a defense for us than the negative declaration?

LA-18

MR. FLOWERS: The EIR is generally considered more -- more easily defended in court because of the stand dashed review that the courts apply, changes

between an MND and an EIR.

So there is a less deferential standard when a court is reviewing a city's decision of whether or not to adopt an MND. It's considered -- it's called a fair argument standard. As long as there's substantial evidence in the record that's sufficient to support a fair argument that the MND failed to adequately analyze some environmental impact, the court would find that an EIR would be required.

The standard for review of an EIR is different. As long as there's any substantial evidence to support the -- the conclusions in the EIR, it will be uphold; so in that sense an EIR is more defensible.

But to be fair to the Applicant and so in -- for edification of the Council and Commission, an MND is a perfectly legitimate part of CEQA.

There are cases where an MND is the most appropriate document. I say that without judging this -- this project in particular but just in 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.

UNOFFICIAL UNCERTIFIED REALTIME ROUGH DRAFT TRANSCRIPT

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.

to constitute an emergency on Bea my behalf to allow you guys to go without an EIR.

LA-19 cont.

UNOFFICIAL UNCERTIFIED REALTIME ROUGH DRAFT TRANSCRIPT

MR. KOTLER: Well, and I -- to be clear, we're not trying to create any sort of emergency. And it's not that it takes us six months to do an EIR.

I understood your question to be how much more time would be required if you did an EIR and my answer is roughly six months.

What I will say is that if at any point we felt that an EIR, based upon the technical studies, was the -- was the document that would have been required, we would have been provided one and the City would have been forcing us to do so.

It is not a decision that is done flippantly, it is not a decision that should be made cavalierly, it is not a decision explicitly that can be made via conjecture or thoughts or rumors or speculation.

It is a very serious labor intensive time consuming decision that is not taken lightly. And as a result because all of the experts and all of the

technical studies that have been reviewed by the City staff, by the City Attorney, by the outside consultants reflect that this meets the thresholds or an MND that was the decision that was made.

As the City Attorney Flowers just mentioned,

there are hundreds of projects in a year in the State of California, most projects don't do an EIR because that is not what is required by the technical documents and the studies therein.

It is not just a -- it sounds just like, oh, just do it. It's not that easy and it does put a lot more stress and pressure on a project.

For this project specifically, and this is something candidly it is not a manufactured emergency that we've just come up with today or this month or last month or the month before or the month before. We have been candid with the City and the public from day one as to the timing restrictions on this project. All the benefits that come with the project.

Admittedly, some of the concerns about whether or not this project -- you know the concerns

raised about this project, this project has specifics time constraints based upon this smaller design.

If we are not able to process this project in the time that we believe has been laid out, and it's not because time should be a factor here, but time is a factor into this project.

We would have to go back to a more intensive

project that was previously provided that was also appropriate for zoning and land use in terms of its density.

We were able to find a specific project that was smaller, that could have all ever these conditions, that could have all ever these financial benefits, that could fit no this community, but we were able to find this project and it had in fact a time restraint on it.

If we are not able to deliver this project, this smaller project, this project that's smaller by 80 percent, that is 90 percent less trucks, that as all the different financial commitments that we have made publically to this City, we will not be able to

deliver this project and as a result we will more likely have to go back to a more larger intensive project.

MS. CROSSNER: And I'm sorry, this is Heather Crossner for Bridge Development.

I just want to add one thing about the difference between the EIR and the MND when it comes to timing.

And it has really nothing to do with the main project that is analyze the. What -- as Brendan

said, you know, our MND has all of the technical analyses and technical appendices that we have been -- that have been studied in the EIR.

The only -- and the main difference in timing between an EIR and an MND is the alternatives.

So just to lay that out a little bit more, for an EIR you have to identify and analyze at least four, it's like four to six project alternatives.

For every single one of those alternatives you have to do this. You have to do a -- a study of the 20 environmental areas, hydrology, hazards, traffic, air quality, for every single one of those

four, five, six alternatives which means basically multiplying that by four, five or six.

And for this project, you know, given all the constraints, given that it's next to the airport, you can't do residential, there has been no retailer who's wanting to come and use this project, there literally is not a project alternative.

So what you would get with an EIR is analyses of four, five or six other projects that could not be constructed.

That's what all that time is -- is added to the process that it -- it doesn't add anything to

this project. It adds something to you know all of these alternatives.

And as we said in effect the process that happened -- was like a project alternative. We understood that was not acceptable, we went to 276, we dropped it again to w72,000.

So I just wanted to add that clarity because I think maybe that's not coming through or, you know, people who aren't like super involved in CEQA don't

real realize you know that is the biggest time difference.

It's not anything additional to our project, it's all the other additional work that has do with those alternatives.

COUNCILMEMBER ZUNIGA: I guess I take a little bit offense to it because I was told along with other two others up here that you would do an EIR and you told us that you would do an EIR when we asked for it and this be it changed somehow --

MR. KOTLER: Well, I apologize to the extent that either I'm not remembering that or if I have in any way not been forthright.

What I believe I've said, and, again, I do apologize if that was the case, is that after

technical -- after we've produced this document, if it was felt -- it was deemed to be inadequate from a technical aspect, that we would then have to consider an EIR. That's --

I believe that's what I said.

I believe -- I remember the question specifically --

COUNCILMEMBER ZUNIGA: I'm sure I can look back at the -- at the recordings but, nevertheless, I certainly --

MR. KOTLER: -- that process.

COUNCILMEMBER ZUNIGA: You have to understand that property has never been developed, ever. It's next to the airport; so there could be some concerns there, especially on Foothill with -- with the -- that's current coming into the City so you've got a traffic flow, people that are avoiding the freeway traffic and Baseline. There's a lot of concerns there.

So I would think -- I would think that doing the best or the most you can do to get everyone on board would have been more helpful.

But, you know, we'll see what happens with -- you know, maybe you can meet with these other

LA-20

folks here and see what they have and answer their questions and hopefully they'll get on board with it.

That's all I have.

MAYOR STONE: Councilmember Velto.

COUNCILMEMBER VELTO: Thank you, Brendan, and your team for the presentation.

I'd like to bring back your traffic gentleman and ask a question as to why only 17 locations were part of the traffic study when we have streets such as 16th and Mountain, 15th and Mountain, 14th and Mountain, 13th and Mountain, 16th -- that's an eastbound, I would think Foothill and Mountain, Foothill and Euclid, 16th and Campus traffic.

Without saying who this eCommerce is and without committing to who it is, if it sounds like a duck and walks like a duck, it's probably going to be that duck.

And let's just go it with -- let's just say it's UPS.

Okay. It's going to be a place that's going to have a lot of vehicles passing through it and if your -- if your intentions at those locations are to do a traffic study at those locations that would

LA-21

2 anticipate there's going to be testify traffic. I
3 want to call your attention to -- at this want to
4 tell you that's absolutely incorrect.
5 That's a poor representation of where
6 traffic will flow. That's a fact.
7 You can argue with me. You're USC, you were
8 a professor there. I will tell you I've been in the
9 City of Upland for over 60 years and I know the
10 streets and we see the City daily and I know the
11 traffic already we have.
12 So I'm concerned that why only those
13 17 locations were studied.

LA-21 cont.

14 MR. GIBSON: So once we go to the primary access
15 to the freeways, once we go to the residential areas,
16 you know, if the -- when the people are ordering
17 whatever, if anybody goes through those areas will be
18 there, regardless of whether it's shipped from this
19 facility or some other facility.
20 COUNCILMEMBER VELTO: I'm not concerned about
21 the delivery, I'm concerned about traversing through
22 the City.
23 If there's traffic on the 210 Freeway much
24 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

the -- and the trip distribution was vetted by your City, was vetted by your City's contract traffic engineers, and they made some changes, and based

on -- so the study was determined based on our discussions with the City and the fact that it was appropriate for the City.

COUNCILMEMBER VELTO: Okay. And if the VMT, you know, the vehicle miles traffics is not currently required by CEQA; is that correct?

LA-22

MR. GIBSON: Yes.

COUNCILMEMBER VELTO: Why is it considered a best practice in traffic versus the level of versus, is it better to be used by municipalities?

I see you hesitating.

LA-22 cont.

MR. GIBSON: Yea.

And I'm hesitating because I'm trying to state my response without making the OPR perform like CEQA.

So VMT measures how far people are traveling.

COUNCILMEMBER VELTO: Uh-huh.

MR. GIBSON: So you know, if you have -- if you have a greenfield development like MD -- let's say we are talking a brand-new specific plan and let's say -- I'll use something far out, let's say Banning, there are a lot of them --

COUNCILMEMBER VELTO: Stay in Upland, don't go

to Banning. I want you to give a comparison --

MR. GIBSON: So in Upland --

COUNCILMEMBER VELTO: I Want you to Specifically -- I want you to specifically address that issue. Okay?.

MR. GIBSON: So in Upland if you look at VMT for employment-generating use, we haven't run the nipples so I cannot guarantee that but I think the VMT would be less than significant.

COUNCILMEMBER VELTO: You think?

So you can't think. We have to know.

MR. GIBSON: Understood but you asked me --

The question is --

COUNCILMEMBER VELTO: I asked you --

MR. GIBSON: The question is if it's the right metric.

COUNCILMEMBER VELTO: So is it?

MR. GIBSON: So it measures how far people are traveling. It's not measuring whether they are traveling through congested routes. As people will do anything, do they care about how far that guy is going or do they care about how much delay, how much time it takes me to get from home to work?

So that is the difference so what we have

analyzed evaluates delay, how long it takes -- how much additional time it will take for me -- will it take me you know --

COUNCILMEMBER VELTO: That's additional traffic is what you're saying?

MR. GIBSON: Uh-huh.

COUNCILMEMBER VELTO: So we'll get additional traffic based on that.

Okay. All right. So we can agree on that?

MR. KOTLER: I just have to interject and I'm sorry but I -- please, stay.

Sandy, stay up here. **

The specific question I believe you asked is

as a City something that's going to impact us day to day going to work, picking up my groceries, picking up my kids, the difference between a VMT and LOS is the LOS standard is localized, it focuses on the actual impacts that will be felt at these very specific intersections. It's the level of service at these intersections. VMT does not; so -- so to give you a hypothetical in Upland, if a project was generating all of its trips from one multifamily development, because it can't fit, you know, a couple hundred people in a house, so in a multifamily

development and was driving just from this multifamily development hypothetically across the street on Foothill and was just driving to this facility, to this project, it's VMT standard would be incredibly low.

But the real world impact faced by the citizens of Upland would be significant. They'd have a locality of people in that very small area.

So, I believe, and, Sandy, please comment on this, but it is generally presumed for facilities or for projects in localized areas, that's why he

brought up Banning which is a little bit further out, but in areas that are more dense and urban, LOS provides a better and more accurate impacts of the impacts that will be felt day to day by the citizens.

MR. FLOWERS: If I can also add to that, Councilmember Velto, Sacramento and the government signed SB743, in essence what they were saying is that congestion is no longer a viable impact. And it's -- in the future which will be I think it's June or July of 2020, July, the VMT is the metric. But.

In terms of the LOS that is looking at the congestion which is a for more significant impact.

But Sacramento, in their infinite wisdom,

decided that that is no longer a viable issue and that another metric needs to be included in the CEQA analysis and that ultimately was a VMT.

COUNCILMEMBER VELTO: So that already happened in.

MR. KOTLER: And to state it more bluntly, Sacrament wanted loca governments to stop opposing projects based done -- especially housing projects

biased on con investigation.

COUNCILMEMBER VELTO: So it's once against taking away local control.

MR. KOTLER: Well, in my opinion you can still does LOS but you have to do VMT.

FLOWERS/DALQUEST: And it impacts the urban areas because to address LOS you generally have to widen your street, widen the lane. In the urban areas you can't do is that because of the build out. And so for the most part that benefits urban areas like San Francisco or Downtown LA but it doesn't benefit an urban area.

COUNCILMEMBER VELTO: But it still becomes an issue of congestion. That's the issue I'm discussing.

FLOWERS/DALQUEST: Right.

COUNCILMEMBER VELTO: The next issue I'm discussing, this may the nobody the be for you, sandy.

Why are they using a particular greenhouse threshold for industrial -- for industrial rather than for commercial and retail, why are you using

LA-23

that? Why are we icing that.

MR. COLITAS: The greenhouse gas threshold for industry.

My name is Ace Colitas, I'm with Kimley-Horn. I'm the technical expert that created the GHG study and the entire 310,000 metric for the threshold for GHG emissions is -- is industry standard for this type of a warehouse project and -- and that's --

You know, when you get to Tier 4 it's a service population metric. And a service population doesn't apply to projects like we're --

COUNCILMEMBER VELTO: But what would go the service -- what would be the service population count? Would tab -- there a count of some kind.

LA-23 cont.

MR. COLITAS: Yeah. It's an efficiency metric so it's essentially per population so per user of the project. And that is geared more towards you know

mixed eyes projects, residential projects. It's not for industrial type projects where you have -- you have the trips and -- but you have few employees.

COUNCILMEMBER VELTO: So you're defining this as be industrial project?

MR. COLITAS: Warehouse industrial, I believe it's --

COUNCILMEMBER VELTO: Not commercial retail?

Would commercial retail be higher, would it be Tier 4? Would commercial retail be Tier 4.

MR. COLITAS: It depends. The -- it depends on the project and the density and the --

COUNCILMEMBER VELTO: Specifically this project, specifically --

MR. COLITAS: If it was commercial, you know, you'd have a different trip generation so you'd have different issues. I don't know if you could --.

I guess I don't understand what you're sag.

COUNCILMEMBER VELTO: I'm asking if a commercial would have potentially 25, 00, 25300 trips right, what does that count if you look at the industrial amount of trips versus a commercial retail, how do they determine who -- the amount of trips that would bring it from Tier 3 to Tier 4 how do we determine

LA-23 cont.

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

employees, like an office would. It has, you know,

per the -- the amount of vehicle trips it has a relatively low service population; so that's just -- that's the way it works notice --

COUNCILMEMBER ZUNIGA: Brendan how, many parking spots does that project have?

MR. KOTLER: I don't want to be misquoted it's over a though.

But just to be clear to give perspective, so the gentleman that was just here up is like the -- the air quality kind of analyst and I don't want him -- I don't want him to be asked questions and have to kind of not necessarily be the right person.

So if there are questions as to whether or not the right vehicle we do have our traffic consultant.

In terms of whether or not this is an atypical facility, it is -- it is -- it is not necessarily an atypical facility. There are similar style facilities that the ITE manual has studied and that is what is used to create the Baseline traffic

condition that was studied in this case.

And -- and as we previously said, to the

extent that there is a concern as to whether or not

that facility would generate an atypical amount of

traffic versus what has been studied, project

conditions can be applied that would limit that or --

or create enforcement mechanisms.

COUNCILMEMBER VELTO: So to go back to

greenhouse -- the greenhouse gas threshold, the point

is that for commercial the threshold is 3,000; is

that correct?

MR. COLITAS: For residential and commercial.

3,000. Yes. Yes.

COUNCILMEMBER VELTO: The report shows

emissions, what 5,200?

MR. COLITAS: Yes.

COUNCILMEMBER VELTO: So you prefer using a

10,000 threshold?

MR. COLITAS: Yes. That's what's appropriate

for this type of use.

COUNCILMEMBER VELTO: So if it -- if it's

commercial properties is shouldn't the threshold be

3,000?

MR. COLITAS: Well, if it was commercial you'd also have higher trips, a greater number of trips.

So all the --

COUNCILMEMBER VELTO: What would be the difference if you ran it from commercial to this type

of project in -- ingress and egress?

MR. KOTLER: So about triple the amount. It would be three times more trips on a retail retail type project.

By just -- but just to be -- I know, clear this is not a commercial zone, this is a -- in a commercial/industrial mixed use; so if a lose for both times. And any sort of study presumably that would be done would be project specific based upon the type.

You want to study this project based upon a commercial use because it is an industrial use. By the same token, you wouldn't want to study an industrial -- a commercial use in an industrial zone because you would -- again, you would -- you would

lose out on what the -- the actual specific metrics that should be applied to this project.

COUNCILMEMBER VELTO: Okay. So let's just go and say that this is a -- industrial, in my mind, means they're building something, there's something industry -- of an industry in there. This is a product moving facility; so it's more commercial in my -- in the way I think it's commercial products being moved through a facility.

So I think if you want to use definitions that's -- that can substantiate that, that's why the problem because the City has discretion, has a lot of discretion when it comes to this.

This issue with amount ever vehicles leaving that facility, if you looked at Lowe's, Lowe's would probably have -- I'll look at my notes here, l would probably have -- from what my understanding is l would have about 1,500 a day. L. Okay. They're commercial, 1,500 a day.

This is a larger footprint in the community; so I want to look at it as commercial. That's the way I want to look at it.

So whether or not I'm right, I want to look at it that way because it's commercial products go through that.

Those vehicles are coming in with material that -- with -- with product in them. They're willing going to come in with product and they're going to leave with product. That's how it's going to work.

MR. KOTLER: I know you to be someone who is, is know, very thoughtful and usually -- and quite -- in this case very specific; so my only response is while

I certainly appreciate the distinction that you're making between the -- in common parlance what is considered commercial or not, technical standards and studies are usually applied based upon the actual zoning code definitions and in this case warehouse is considered an industrial and light industrial using and as a result, those are the metrics to which it is applied.

And, again, that makes sense because when you look at the spread of -- of trucks I --

Apologize, please correct me so I don't --

COUNCILMEMBER VELTO: Go ahead, I know you might need some time but get it right.

COUNCILMEMBER ELLIOTT: The zoning code, our Upland Municipal Code has warehouse under commercial, it does not have warehouses under industrial.

MR. KOTLER: Then I --

COUNCILMEMBER VELTO: That's --

COUNCILMEMBER ELLIOTT: If you look Upland Municipal Code and when we go into the zoning part of the Upland Municipal Codes, if you look as industrial you're not going to see warehouses, you're going to see warehouse under the -- the chart for commercial.

MR. KOTLER: But I -- and I don't have it in

front of me and I do apologize but is short-term storage considered industrial?

COUNCILMEMBER VELTO: Short-term storage?

COUNCILMEMBER ELLIOTT: I don't have that in front of me.

COUNCILMEMBER VELTO: That has a specific zoning I believe. I believe storage has its own specific zoning because I know people that want to billed them

all over and it's a difficult.

FLOWERS/DALQUEST: If you're thinking like a you-store-it structure that's consider considered a different use than warehouse.

MALE SPEAKER: I have the zoning code in front of me if you look at the industrial zones, industrial, warehousing is permitted in both.

COUNCILMEMBER VELTO: Under what, commercial?

MALE SPEAKER: No, the light industrial and general industrial zone, warehousing is permitted in this both.

COUNCILMEMBER VELTO: What does this -- what constitutes industrial?

DALQUEST/FLOWERS: There -- there is actually a description of "light industrial" in the zone and it includes a number of different uses and it expressly

calls out warehousing and distribution as --

COUNCILMEMBER VELTO: But not commercial, it's not considered commercial?

DALQUEST/FLOWERS: Well, this is a mixed-use commercial light industrial zone; so it's a little

bit of an odd duck so it might be both.

COUNCILMEMBER VELTO: If it's mixed-use commercial then commercial could -- we could apply a commercial requirement then for the tier -- to the tier for the -- excuse me, for that.

What my concern is is air quality. We could technically do that.

FLOWERS/DALQUEST: We could. The question comes from a -- from a technical sense and I'm not an engineer or an analyst but just the legal view of this would be what -- what is the most appropriate analysis or standards for analysis given the type of use that is actually presented as the project.

COUNCILMEMBER VELTO: I would think the State of California, as concerned as they are about greenhouse gas effects, would probably lean towards what I'm thinking; so I -- I do --

I want to make sure that as we move down this path that we -- we are -- we're coming --

LA-23 cont.

LA-23 cont.

We're holding this to a highest standard possible is what you're trying do because if Upland is going to be known for this type ever a facility,

then why not take it to the highest standard of -- of -- of care if we're going to -- if it has the potential to be approved?

That's one thing I want to look at.

Now, I'm not looking for accolades here or applause but I want to make sure is that -- is that we're holding this to the highest standard of care so that we make sure that if the future that we've prevented any potential problems health wise and environmentally today that we don't know about in the future.

Is it would be great if they go to all electric, if all this -- all this great stiff happens but I'm still going to go back to the amount of traffic we're going to see increase because of any project, again, walks like a duck, talks like a duck, it's a duck.

And, I'm sorry, I just want to make sure that we've covered everything to the extreme I and want -- I would love to see the project work properly.

LA-23 cont.

MR. KOTLER: And I --

You and I share that view, that everything should be done to the highest standard of care and should be done properly.

But I also believe that you and I share the view that this -- that this project or any project should be viewed appropriately. And that if you are looking for inappropriate I would say ways of comparing this project to standards that it does not reside in, just I think as the Attorney -- City Attorney mentioned, cities typically try to find the most appropriate, most like description to follow. And it might not be the most restrictive because the project isn't what would fall into that most restrictive.

So I would -- while I certainly second and agree that this should be to the utmost standard of care, all the T's should be crossed, all the I's should be dotted, everything should be done to the highest levels possible and appropriate to match this project.

That's why we do project-specific analysis, because you wouldn't just apply residential standards to a commercial standard and project. And you

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

working it out in public; so I don't want to --

COUNCILMEMBER VELTO: No, no --

DALQUEST/FLOWERS: I don't want to dismiss the project --

COUNCILMEMBER VELTO: And I want that -- I want that on record that I would like to see that.

DALQUEST/FLOWERS: Absolutely. It's exactly the kind of thing the process is supposed to work out.

COUNCILMEMBER VELTO: Okay. And has this been discussed -- Has staff discussed this with AQMD? Have the staff discussed this with -- Have you guys discussed this with -- the the Tier 3 levels, the Tier 4 levels with the South Coast Air Quality Management?

DALQUEST/FLOWERS: No, we haven't.

COUNCILMEMBER VELTO: Would that be something we would -- that you should do?

DALQUEST/FLOWERS: Well, we can look into that if that's what your direction is.

COUNCILMEMBER VELTO: Anybody else have --

COUNCILMEMBER ELLIOTT: Absolutely.

COUNCILMEMBER VELTO: Yes. I would like to have that looked into.

COUNCILMEMBER ELLIOTT: We can't make that decision.

COUNCILMEMBER VELTO: Well, I think we can recommend staff ask -- look into that.

DALQUEST/FLOWERS: But, you know, we did circulate this to the Clearinghouse; so that's going to -- that process is going to end on the 21st and then we'll get comments from the state agencies that reviewed the document.

COUNCILMEMBER VELTO: Okay. Fair enough.

I gave up my time.

MAYOR STONE: All right. I -- I feel bad.

All right. Who on the Planning Commission side?

Go right ahead.

COMMISSIONER NOVIKIV: Yes.

I have a question for the representative of

the Kimley-Horn.

So that's about the noise impact, so that's about the families that have kids along the Central Avenue, we have apartment complexes there. And I drive there quite often taking my kids to a karate studio right at that intersection on Central; so I look at the parkings (sic), they are really situated

LA-24

about less than 10 feet away from Central Avenue.

Now, if we're thinking about adding all these trucks, right, at night, 20 trucks? That's about maybe one truck every 20 minutes; so how do you determine, with these numbers that you have, that it has less than significant impact?

Because I live in a gated community where we have a truck -- delivery truck coming, UPS, FedEx, all right, I wake up from just the lights and it takes me 20 minutes to go back to sleep; so I want to think about those families and how did you really consider them? Did you think about them --

Thank you.

MALE SPEAKER: Yes. And I also prepared the noise study. And we -- we did model the traffic

noise and we created a -- probably a more conservative fleet mix; so what the project was actually contributing to the -- to the existing roadway noise.

The first thing I would like to note, though, is that the project is actually reducing the truck trips because there's currently truck occurring from the site as it exists now with the --

However, we did not take credit for that in

the noise study.

And this project has fewer trips and -- truck -- heavy-duty truck trips, it has mostly, excuse me, the lighter vans. And there -- based on the model, we modeled existing conditions, we modeled the project conditions, both in the opening year and horizon year and future years, and there wasn't an audible noticeable change in the noise levels.

It generally takes -- oh, you think a truck going by, that's pretty loud. But it takes a doubling of the traffic volume to actually create a -- a noticeable increase in noise. That's --

that's just -- that's the way the --

You know, you already have a significant

or energy or traffic that creates that energy which

results in the noise.

And in order to --

You know, because noise is logarithmic, it's

really a case of you have to multiply it by -- you

know, on a logarithmic scale; that's why it takes

a -- a doubling just to have that perceivable

increase in noise.

So -- so that's kind of the -- putting it

into perspective. But we did the modeling and it

shows that the -- there's not a noticeable increase

from the traffic.

COMMISSIONER NOVIKIV: Okay. Thank you.

Were the people asked their -- you know,

maybe by the company, by the Bridge Development who

were already living there along -- along the Central

Avenue? Did you go and speak inside the departments,

you know, to measure some --

MALE SPEAKER: It's not really part of the CEQA

process to -- to go inside. The standard protocol

LA-24 cont.

and methodology is to -- to do the modeling process that we did to determine the project's impact. You know, there is a lot of other variables.

But, you know, that's really outside of the scope of -- of CEQA, of the CEQA analysis.

COMMISSIONER NOVIKIV: So basically you believe that this number is the best you have that they will not impact people living, right?

I mean, I'm just talking about one specific area. There are some other areas -- you know, there are many areas that this --

LA-24 cont.

MALE SPEAKER: Right.

We modeled all the roadways that were in those traffic studies and the area --

COMMISSIONER NOVIKIV: Thank you.

MAYOR STONE: All right. Any other questions?

Go ahead, Robin.

COMMISSION CHAIR ASPINALL: This is more on process, I think for the staff.

Tonight I know we can only talk about what has been presented and the -- the initial study and

LA-25

MND. But what --

Does -- does the financial aspects of this project go to the Planning Commission or does that go to the City Council?

LA-25 cont.

DALQUEST/FLOWERS: Are you talking about in terms of the DA?

COMMISSION CHAIR ASPINALL: I must be.

DALQUEST/FLOWERS: The development agreement and the ultimate decision whether or not to pursue the development belong to the -- as a legislative act, it belongs to the City Council.

COMMISSION CHAIR ASPINALL: So the Planning Commission will not get into -- it's only limited to --

LA-25 cont.

DALQUEST/FLOWERS: You will be asked to make a recommendation on it --

COMMISSION CHAIR ASPINALL: On the financial

aspect to --

DALQUEST/FLOWERS: On the development agreement.

It's a tricky question, to be honest,because it's -- the financial aspects are typically -- you know, they're -- they're outside the expertise and

typical subject matter of the -- of the typical Planning Commission; so generally it's -- you're reviewing it for its impacts in terms of -- for -- as a planning document.

And in that regards, it's about how long is the vesting of the project? What sort of -- how do you account for development impact fees and things like that, which have a planning aspect.

But in terms of kind of the raw deal points, it's not something that is typically negotiated by a Planning Commission.

DALQUEST/FLOWERS: But that's separate and apart from the actual project's entitlements and the --

DALQUEST/FLOWERS: Yes.

DALQUEST/FLOWERS: -- CEQA determination. they --

Both Commission and the Council will have to the decision whether or not to approve the project on its merits with reference to the findings for the

site review. That's different from the findings that 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.

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?

LA-26

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.

UNOFFICIAL UNCERTIFIED REALTIME ROUGH DRAFT TRANSCRIPT

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.

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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	ft²
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 ($\mu g/m^3$)	REL 8-hr Chronic ($\mu g/m^3$)	REL Acute ($\mu g/m^3$)	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

I-23

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

THA = [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

I-23

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

	HIA - Commercial									
Compound	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 * MWAF] / 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	

I-23

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

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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.

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.

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.

I-43

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

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

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

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.

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

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.

I-47b

Proposed Requirement #3

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

I-47c

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

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.

I-47d

Proposed Requirement #5

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.

I-47e

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

-----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

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

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

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, This project cannot be allowed. I will be there on February 12th to voice my opinion.] I-50

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.
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-51

I appreciate the attention of the Council Members and the City Officials to this important matter.

Respectfully Submitted,

SHA

Shawn Ariannia, Ph.D., P.E., G.E.
1453 Lookout Court
Upland, CA 91784

Geo-Advantec Inc.
G Geotechnical Engineering
A Earthquake Engineering
I Inspection and Testing
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

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

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

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

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.

I-53

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

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

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

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

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

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

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

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).

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-57

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

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

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

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,

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.

I-63b cont.

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.

B. Flawed estimates of traffic generated by Bridge Point Upland Project warehouse

I-63c

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.

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.

I-63c cont.

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.

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]

I-63d cont.

IV. Should We Believe the *Air Quality Assessment* or the *Greenhouse Gas Emissions Assessment*?
No.

I-63e

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.

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.

I-63f cont.

VI. The Elephant in the Room…Or Parking Lot: 1,104 Van Parking Spaces

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.

I-63g

VII. Conclusion

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

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	*16.81*	*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.

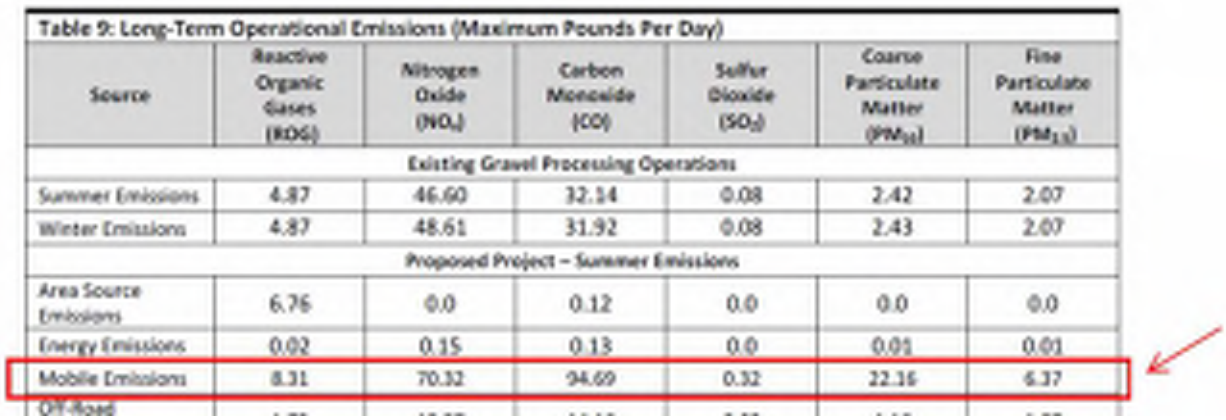
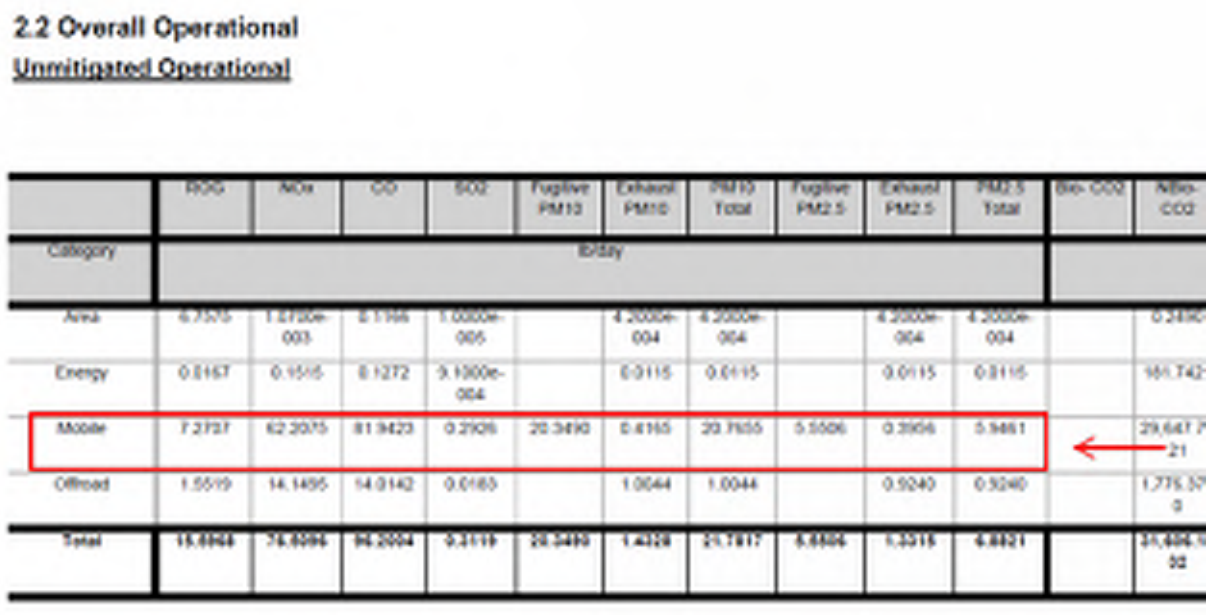


Table 9: Long-Term Operational Emissions (Maximum Pounds Per Day)

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						



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	0.1988	1.0000e-005		4.2000e-004	4.2000e-004		4.2000e-004	4.2000e-004		0.2890
Energy	0.0167	0.1516	0.1272	9.1000e-004		0.0115	0.0115		0.0115	0.0115		181.742
Mobile	7.2707	62.2075	81.9423	0.2926	20.3490	0.4165	20.7655	0.5006	0.3956	0.9461		29,647.7 21
Offroad	1.5519	14.1495	14.0142	0.0165		1.0044	1.0044		0.9240	0.9240		1,775.37 3
Total	15.6968	76.6094	96.2004	0.3119	20.3490	1.4328	21.7817	0.5006	1.3315	1.8821		31,605.1 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.

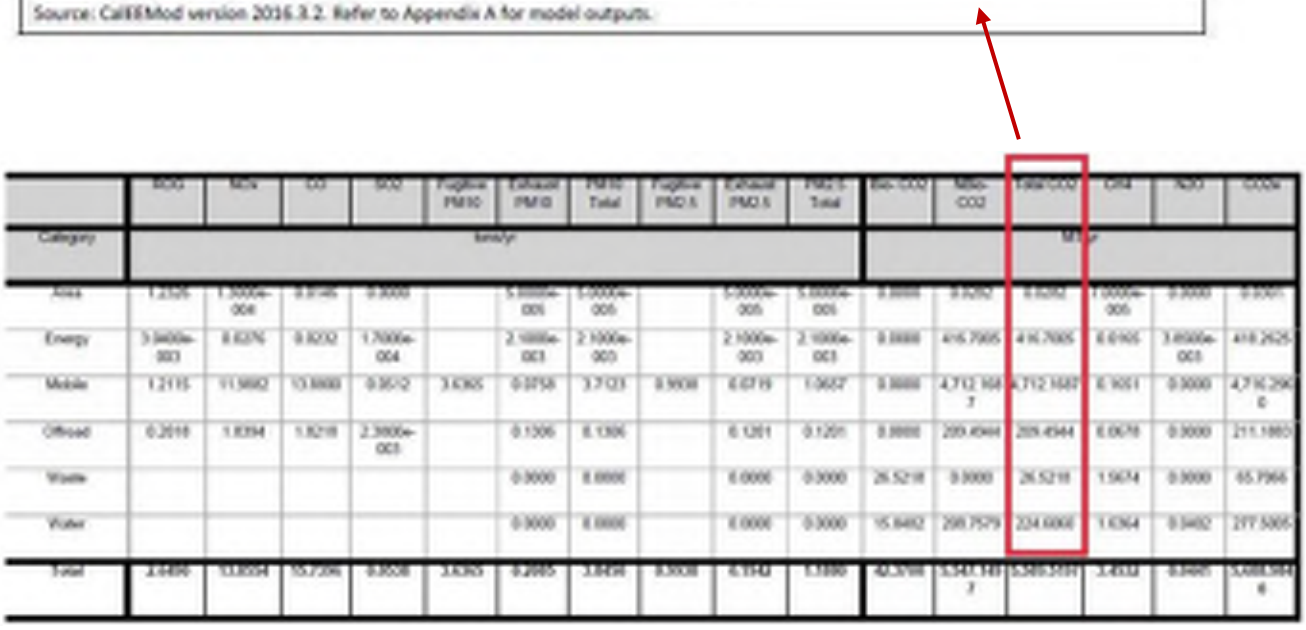
Exhibit 4

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.



Category	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
	lbs/yr												MT/yr			
Area	1.2326	1.3000e-004	0.0146	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0282	0.0282	1.0000e-005	0.0000	0.0301
Energy	3.9400e-003	0.0376	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	11.9602	13.8000	0.0572	3.6365	0.0758	3.7123	0.9938	0.0719	1.0657	0.0000	4,712.1687	4,712.1687	0.1651	0.0000	4,716.2960
Offroad	0.2019	1.8394	1.8218	2.3900e-003		0.1306	0.1306		0.1201	0.1201	0.0000	209.4944	209.4944	0.0679	0.0000	211.1883
Waste						0.0000	0.0000		0.0000	0.0000	26.5218	0.0000	26.5218	1.5674	0.0000	65.7966
Water						0.0000	0.0000		0.0000	0.0000	15.8482	208.7529	224.6011	1.6364	0.0402	277.5065
Total	3.4460	13.8374	15.7096	0.0578	3.6365	0.2065	3.8436	0.9938	0.1920	1.1858	42.3699	5,547.1687	5,589.5386	3.4519	0.0402	5,688.9834

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

Bridge Point Upland Project - San Bernardino-South Coast County, Summer

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

Bridge Point Upland Project - San Bernardino-South Coast County, Annual

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.

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.

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.

I-64

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

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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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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

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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

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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

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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."

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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

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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

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of primarily stationary sources during operation. The primary source of air pollution for warehouse projects during operation is trucks, which are mobile sources.

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

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:

- Added truck traffic
- Health risk due to vehicle emissions
- Decrease in property value

I-67

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.

- 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. I-68

- 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’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-70

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 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!

I-71

Sincerely,
Michael and Karen Melvin

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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. McJoynt

/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 (3½% 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.).

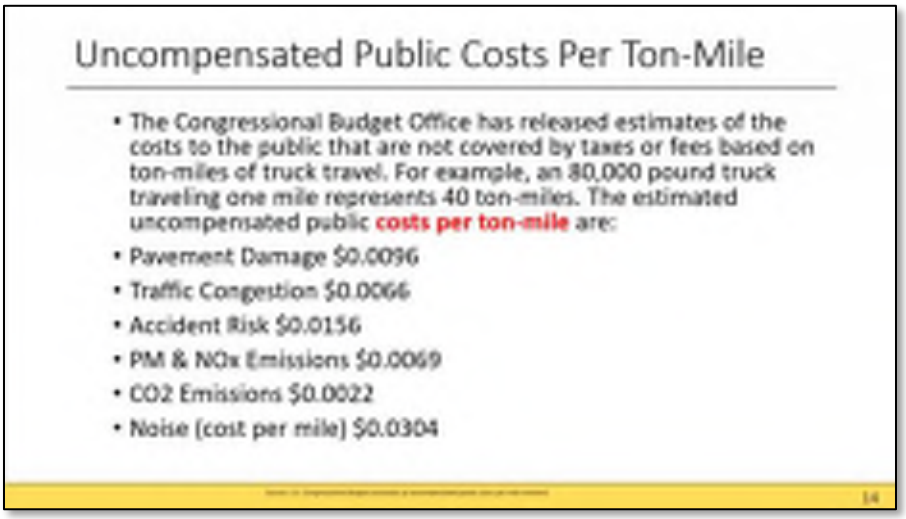
I am also very concerned this will cause significant degradation of our air quality and increase in emissions that will further perpetuate global warming. I am also concerned this will significantly impact our water quality, groundwater renewal, and storm water retention that is necessary to prevent 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



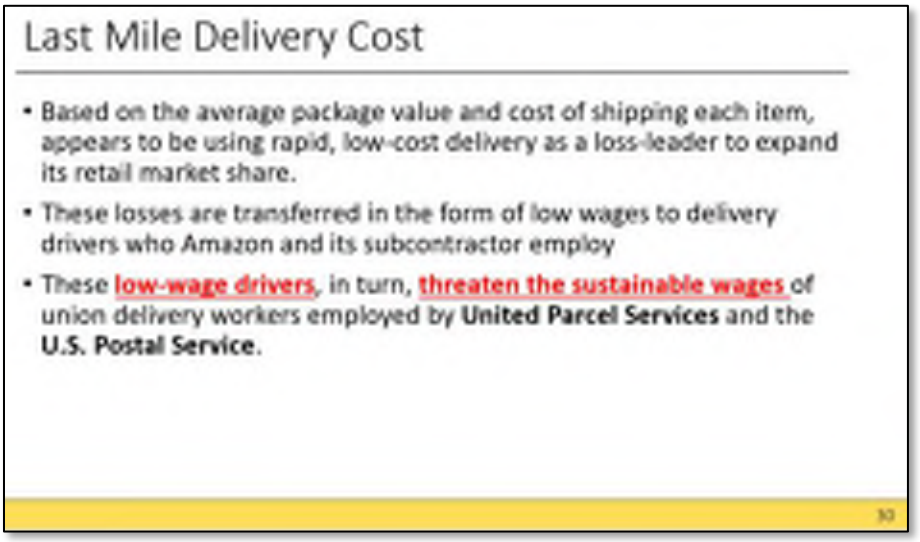
SOURCE: ECONOMIC ROUNDTABLE, "TOO BIG TO GOVERN", PUBLIC BALANCE SHEET FOR THE WORLD'S LARGEST STORE, NOV 2019

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

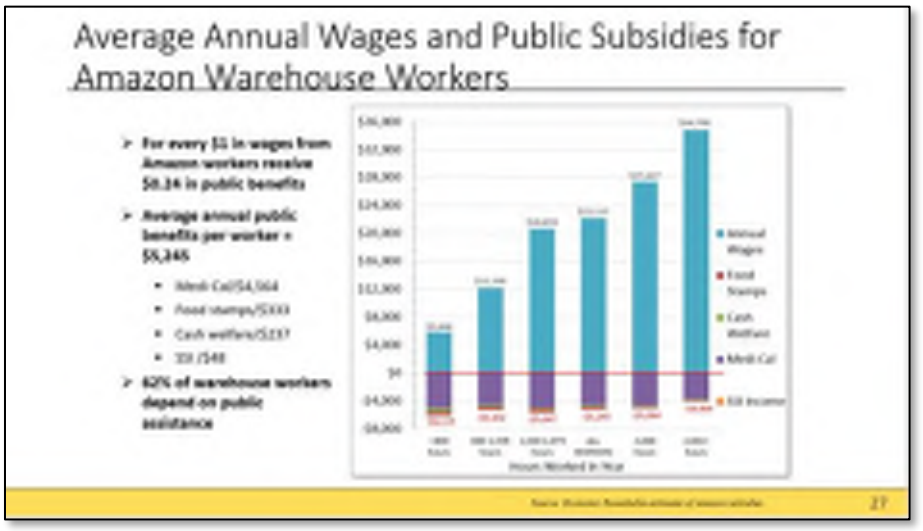
SOURCE: ECONOMIC ROUNDTABLE, "TOO BIG TO GOVERN", PUBLIC BALANCE SHEET FOR THE WORLD'S LARGEST STORE, NOV 2019

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.

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

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.)

I-79a cont.

Potentially Significant Environmental Impacts Warranting an EIR

Air Quality Impacts

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.

I-79b

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.

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-79b cont.

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-79c

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. I-79d

<u>Energy Impacts</u>

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." I-79e

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.

In terms of renewables, the Project is not consistent with the CEQA Guidelines, Appendix F, which states: I-79e cont.

> 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.

I-79f cont.

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

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

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-79f cont.

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

I-79g

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

I-79h

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:

- 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
Jpland, 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

RECEIVED

JAN 2 1 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.

I-82

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.

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

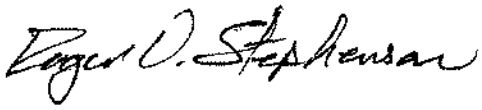
My review identified key deficiencies in the draft IS and MND documents:

- 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

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

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.

I-85

- 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.
    - 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
- 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.

I-85

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

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

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.
Sincerely,
Linda Trawnik

I-86

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

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

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

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

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 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**.

I-89

Sincerely,
Micheal Kelly

Phone: (909) 981-2030 m4justice@verizon.net

Marjorie Musser Mikels
P. O. Box 1428
Upland, CA 91785-1428

RECEIVED
JAN 2 1 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

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

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

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

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.

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). I-92

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

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

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

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

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 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. I-96

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

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

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

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

Dear Mike Poland,

I-98

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?

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 am currently serving as President of the Historic Downtown Upland Board and have also been a resident of Upland for over 30 years. I-102

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.

Dear Mr. Poland. This email is to express my support of the Bridge Development Project. I-103

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

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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

I-106

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 dela 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 Villasenor

880 Orchard Ct #2
Upland CA 91786

909 789-3992

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,

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.

I-112

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 Alcorn 909-268-2201
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

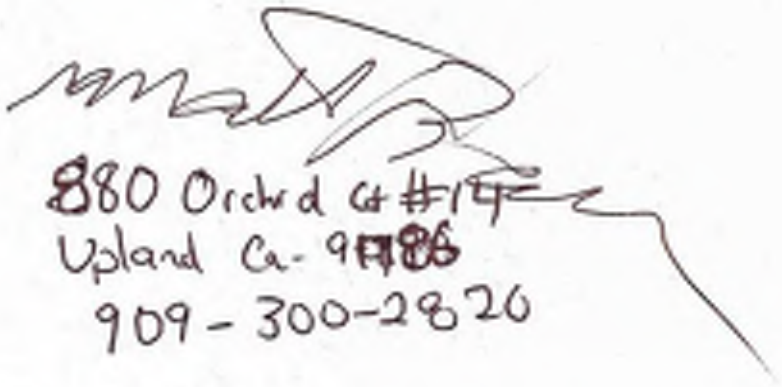
Dear Upland City Council:

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,

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,

Frances Nuño 8560 Cherry Ave 9178[illegible]

I-117

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
1537 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 LP

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 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. I-123

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!!

Marcella Mendez 2205 9th Apt. E11

To: Upland City Council and Planning Dept.

I-124

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.

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. 141A
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,

Vincent 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 N 207 Arrowrte
Upland
91784
909 536 7238

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

Ali Zgheb

(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 Gollings

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

Dana Dillow

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 Vaden 11/23/17

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,

Brenda 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,

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.

I-136

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,

I-138

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.

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
9094638781L

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
213-264-9576

Dear Upland Planning Commissioners,

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. I-142

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. Jof
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 9095451784

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,

Corey K

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

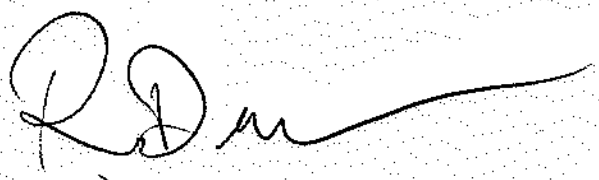
To the Upland Planning Commission,

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,



[redacted] 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 Rte
(461)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 Canan (909)560-6672
1690 Arrow Rte Upland CA 91786

50
Greb

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"

Bd

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.

...il 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.

I-155

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 support our police department and local businesses. We urge the City Council to approve the project.

	Name	Address	City & Zip Code	Telephone	Email
1	Rodrigo G[illegible]z	[redacted]			
2	Ahmed Ramirez	[redacted]			
3	U. Patel	[redacted]			
4	Cody Meek	[redacted]			
5	Julia Lopez	[redacted]			

II. Supplemental Information Prepared in Response to Comments

Attachment 1

Peer Review of GHG Technical Report

RAMBOLL

ENVIRONMENT
& HEALTH

Delivered via Electronic Mail

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

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

January 27, 2020

Ramboll
5 Park Plaza
Suite 500
Irvine, CA 92614
USA

T +1 949 261 5151
F +1 949 261 6202
www.ramboll.com

Dear Mr. Poland:

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

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

As described below, our peer review confirms that the information contained in the GHG Report was prepared using the most-recent, agency-recommended model consistent with SCAQMD guidance and industry standards for estimating GHG emissions and environmental impacts under CEQA. The updated GHG Report estimates the project's GHG emissions while taking into account mitigation measures and project design features that the project will be required to implement. Although the MND did not identify a significant GHG impact, the project has committed to further reducing GHG emissions by installing solar panels (to achieve net zero electricity), installing EV chargers, planting trees and other measures. The project's GHG emissions would continue to be below the significance threshold identified in the MND. The GHG Report also demonstrates that the project's GHG emissions would be below 3,000 metric tons of CO_2e per year.

1. Emissions Inventory

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

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

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

a. Updates to the existing emissions inventory;

b. A more accurate utility emission factor;

c. Incorporation of the GHG reduction from electric vehicle chargers;

d. Incorporation of the GHG reduction from solar panels;

e. Incorporation of electric forklifts instead of compressed natural gas forklifts; and

f. Incorporation of the increased carbon sequestration based on the Project's commitment to planting of trees.

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

2. Thresholds of Significance

Ramboll also reviewed the GHG significance thresholds used to assess the Project's GHG emissions. The MND uses a 10,000 metric ton (MT) of carbon dioxide equivalent emissions (CO_2e) per year threshold to assess significance of the Project.

The SCAQMD has not adopted a GHG significance threshold that applies to most land use development projects. The 10,000 MT CO_2e per year threshold was adopted to capture 90 percent of total emissions from all new or modified industrial (stationary source) projects.[1] A 3,000 MT CO_2e per year value was proposed as a screening threshold for land use development projects but was never adopted in any form by SCAQMD. In the absence of an adopted threshold, the lead agency has discretion to select a significance threshold. Thus, in this context, many lead agencies have applied the 10,000 MT CO_2e per year as a significance threshold because it was adopted by SCAQMD.

Various lead agencies have used different approaches as a GHG significance threshold for warehouse development projects, including relying on the 10,000 MT CO_2e per year significance threshold. Thus, based on our assessment of the current state of the GHG CEQA practice, the MND approach to assess the significance of GHG emissions using 10,000 MT CO_2e per year is consistent with the current common approaches by lead agencies to evaluate a warehouse project's GHG emissions under CEQA. Moreover, in the response to comments, the Updated GHG Report demonstrates that the Project's GHG emissions would be below 3,000 MT CO_2e per year even if that threshold were applicable. Based on our peer review, the MND used a common approach to determine that the Project's GHG emissions would be less than significant, and the responses to comments used an even more conservative

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

approach by incorporating Project Design Features to further reduce GHG emissions below 3,000 MT CO_2e.

3. New Project Design Features

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

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

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

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

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

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

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

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

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

CONCLUSION

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

Yours sincerely,

Eric Lu, MS, PE
Principal

D 949-798-3650
elu@ramboll.com

Shaena Ulissi, MS
Managing Consultant

D 415-426-5033
sulissi@ramboll.com

Attachment 2

Supplemental GHG Analysis

Kimley»Horn

MEMORANDUM

To: Michael Poland, Contract Planning Manager

From: Ace Malisos

Kimley-Horn and Associates, Inc.

Date: January 24, 2020

Subject: Supplemental GHG Analysis for the Bridge Point Upland Project

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Introduction

The Greenhouse Gas (GHG) analysis within the *Bridge Point Upland Initial Study/Mitigated Negative Declaration* (IS/MND) (December 3, 2019) and associated GHG Emissions Assessment was conducted using modeling and methodology in accordance with standard industry practice and recommendations set forth by the South Coast Air Quality Management District (SCAQMD). The analysis included the use of the California Emissions Estimator Model (CalEEMod) and GHG emissions thresholds consistent with approaches used by various other Lead Agencies in the preparation of California Environmental Quality Act (CEQA) compliance documents. However, in response to comments on the GHG analysis, refinements and additional sustainability commitments in the form of new Project Design Features have been made to the Project GHG emissions and are discussed in this memorandum.

It should be noted that the model refinements are provided for informational purposes only to demonstrate that the Project's emissions would be below both the 10,000 metric tons of carbon dioxide equivalent per year ($MTCO_2e$/year) industrial threshold and the 3,000 $MTCO_2e$/year non-industrial proposed screening threshold, that has not been adopted by SCAQMD.[1, 2]

New Project Design Features

As noted above, a number of new sustainability commitments have been added as part of the Project, which will be enforceable through the following new Project Design Features:

[1] Although the SCAQMD has not formally adopted a GHG significance threshold that applies to most land use development projects, the *Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #15* indicate that the 3,000 $MTCO_2e$/year threshold is for mixed-use projects.

[2] The California Attorney General indicates that the 10,000 metric ton threshold is appropriate for warehouse facilities (Brief of Amici Curiae the Attorney General and The California Air Resources Board in Support of Plaintiffs and Respondents Albert Thomas Paulek, et al. and Plaintiffs and Appellants Laborers International Union of North America, Local 1184, et al.)

PDF-GHG-1: The Project shall stall 0.75 MW of rooftop solar; this equates to approximately 55,000 square feet of roof space however the total square footage may vary provided that 0.75 MW of power is achieved.

PDF-GHG-2: The Project shall provide electric vehicle (EV) charging stations to service 30 parking spaces.

PDF-GHG-3: The Project shall provide the following EV-ready spaces, i.e. install, at a minimum, conduits for future plug-in of EV chargers; providing EV-ready spaces allows installation of the latest technology chargers at the time that electric delivery vans and trucks become operational, rather than installing charging stations immediately that become obsolete at the time that electric vans and trucks become used:

- 50% of auto stalls, including 100% of ADA stalls
- 100% of van parking stalls
- 100% of trailer parking stalls
- 100% of dock doors
- 100% of van positions at van loading areas at north and south sides of the building

PDF-GHG-4: The Project shall include 1,000 trees throughout the parking lot and landscaped areas around the Project site.

PDF-GHG-5: The Project shall use all electric powered forklifts.

PDF-GHG-6: Electric landscaping equipment, such as lawn mowers and leaf blowers, shall be used on-site.

As indicated above, the Project has included substantial efforts to electrify onsite vehicles (i.e., forklifts); promote the conversion to electric vehicles (EVs); and to utilize roof space for solar photovoltaics (PV). The inclusion of EV chargers servicing 30 parking spaces far exceeds the current California Building Code requirements of only 6 percent of the total parking spaces to be EV-capable spaces, i.e. there is no requirement in the California Building Code that chargers be installed, only that EV infrastructure be installed for 6% of spaces. As a result of the new solar commitment, the project building is projected to have **net-zero electricity consumption**.

The following changes have been made to Mitigation Measure AQ-3 in the IS/MND to reflect the new Project Design Features:

- AQ-3: 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.~~ (now replaced with PDF-GHG-2 and PDF-GHG-3)
    - ~~At least 6 percent of all vehicle parking spaces (including for trucks) shall be designed to accommodate future electric vehicle charging stations.~~ (now replaced with PDF-GHG-2 and PDF-GHG-3) 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.
    - Legible, durable, weatherproof signs shall be placed at truck access gates, loading docks, and truck parking areas that identify applicable California Air Resources Board (CARB) anti-idling regulations. At a minimum, each sign shall include (1) instructions for truck drivers to shut off engines when not in use; (2) instructions for drivers of diesel trucks to restrict idling to no more than 5 minutes; and (3) telephone numbers of the building facilities manager and CARB to report violations.
    - 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 SmartWay program.

Refined GHG Emissions Incorporating New Project Design Features

In response to comments on the GHG analysis included in the IS/MND, the following updates were made to the GHG analysis:

- Updates to the existing emissions inventory;
- A more accurate utility emission factor;
- Incorporation of the GHG reduction from electric vehicle chargers;
- Incorporation of the GHG reduction from solar panels;

- Incorporation of electric forklifts instead of compressed natural gas forklifts; and
- Incorporation of the increased carbon sequestration based on the Project's commitment to planting of trees.

Table 1 shows that with incorporation of the Project Design Features and updates to the emissions inventory, Project GHG emissions would be below 3,000 $MTCO_2e$/year.

Table 1: Project GHG Emissions Update

Emissions Source	**Greenhouse Gas Emissions (MT CO_2e per Year)**
	Updated Inventory
Construction Amortized Over 30 Years	34
Area Sources	0.03
Energy	319
Mobile	5,114
Off-Road (forklifts)	111
Waste	66
Water and Wastewater	224
Project Design Features	
Vegetation Amortized over 30 Years	-24
Solar PV	-289
EV Chargers	-214
Sub-Total	**5,340**
Existing Emissions	2,437
Project's Net Increase	**2,904**
Updated Emissions Below 3,000	

Conclusion

Although the MND did not identify a significant GHG impact, the Project has committed to further reducing GHG emissions by installing solar panels (anticipated to achieve net zero electricity), installing EV chargers, planting trees and other measures. The Project's GHG emissions would continue to be below the significance threshold identified in the MND. The analysis above also demonstrates that the Project's GHG emissions would be below 3,000 metric tons of CO_2e per year.

Appendix A

Modeling Data

Bridge Point Upland - San Bernardino-South Coast County, Annual

Bridge Point Upland

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	266.82	1000sqft	6.13	266,825.00	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**	2020
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	522	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics - Updated per SCE corporate responsibility report and RPS targets

Land Use - 266.8 kSF buildings, 6.53 acres (284 KSF) landscaping, 1,306,800 KSF parking

Construction Phase - anticipated construction schedule

Off-road Equipment - anticipated construction equipment

Off-road Equipment - anticipated construction equipment

Off-road Equipment -

Off-road Equipment - anticipated construction equipment

Off-road Equipment - anticipated construction equipment

Off-road Equipment -

Trips and VMT - Export site is less 1 mile from project site

Demolition -

Grading - Anticipated export

Architectural Coating - low VOC paint mitigation

Vehicle Trips - trip rates from Translutions trip generation report using High Cube Warehouse

Construction Off-road Equipment Mitigation - mitigation per Rule 403

Area Mitigation -

Water Mitigation -

Waste Mitigation -

Operational Off-Road Equipment - equipment would be electric

Fleet Mix - Fleet mix from Translutions Traffic Study

Energy Use -

Sequestration -

Table Name	Column Name	Default Value	New Value
tblConstDustMitigation	CleanPavedRoadPercentReduction	0	6
tblConstDustMitigation	WaterUnpavedRoadMoistureContent	0	12
tblConstDustMitigation	WaterUnpavedRoadVehicleSpeed	0	15
tblConstructionPhase	NumDays	30.00	0.00
tblConstructionPhase	NumDays	20.00	2.00
tblConstructionPhase	NumDays	45.00	35.00
tblConstructionPhase	NumDays	440.00	100.00
tblConstructionPhase	NumDays	35.00	66.00
tblConstructionPhase	NumDays	35.00	14.00
tblFleetMix	HHD	0.06	0.02
tblFleetMix	LDA	0.55	0.23
tblFleetMix	LHD1	0.02	0.38
tblFleetMix	MH	1.0820e-003	0.00
tblFleetMix	OBUS	1.3370e-003	0.00

tblFleetMix	SBUS	8.1700e-004	0.00
tblFleetMix	UBUS	1.6570e-003	0.00
tblGrading	MaterialExported	0.00	431.00
tblLandUse	LandUseSquareFeet	266,820.00	266,825.00
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	0.00
tblOperationalOffRoadEquipment	OperHoursPerDay	8.00	0.00
tblProjectCharacteristics	CO2IntensityFactor	702.44	522
tblSequestration	NumberOfNewTrees	0.00	1,000.00
tblTripsAndVMT	HaulingTripLength	20.00	10.00
tblTripsAndVMT	WorkerTripNumber	33.00	20.00
tblVehicleTrips	ST_TR	49.97	36.50
tblVehicleTrips	ST_TR	1.68	7.94
tblVehicleTrips	SU_TR	25.24	36.50
tblVehicleTrips	SU_TR	1.68	7.94
tblVehicleTrips	WD_TR	42.70	36.50
tblVehicleTrips	WD_TR	1.68	7.94

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	1.9843	4.2367	3.8210	0.0111	0.7158	0.1415	0.8573	0.2124	0.1321	0.3446	0.0000	1,008.8594	1,008.8594	0.1233	0.0000	1,011.9423
Maximum	**1.9843**	**4.2367**	**3.8210**	**0.0111**	**0.7158**	**0.1415**	**0.8573**	**0.2124**	**0.1321**	**0.3446**	**0.0000**	**1,008.8594**	**1,008.8594**	**0.1233**	**0.0000**	**1,011.9423**

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	1.9843	4.2367	3.8210	0.0111	0.5668	0.1415	0.7083	0.1617	0.1321	0.2938	0.0000	1,008.8590	1,008.8590	0.1233	0.0000	1,011.9419
Maximum	**1.9843**	**4.2367**	**3.8210**	**0.0111**	**0.5668**	**0.1415**	**0.7083**	**0.1617**	**0.1321**	**0.2938**	**0.0000**	**1,008.8590**	**1,008.8590**	**0.1233**	**0.0000**	**1,011.9419**

	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**	**20.82**	**0.00**	**17.38**	**23.90**	**0.00**	**14.74**	**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	2.4222	2.4222
2	5-1-2020	7-31-2020	2.8999	2.8999
3	8-1-2020	9-30-2020	0.9028	0.9028
		Highest	2.8999	2.8999

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	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	8.0000e-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	317.3894	317.3894	0.0165	3.8500e-003	318.9513
Mobile	1.3769	13.5321	16.0509	0.0556	3.8731	0.0882	3.9613	1.0572	0.0837	1.1409	0.0000	5,109.0598	5,109.0598	0.1948	0.0000	5,113.9303
Waste						0.0000	0.0000		0.0000	0.0000	53.0436	0.0000	53.0436	3.1348	0.0000	131.4132
Water						0.0000	0.0000		0.0000	0.0000	19.8102	193.7087	213.5189	2.0455	0.0503	279.6360
Total	**2.6126**	**13.5599**	**16.0888**	**0.0557**	**3.8731**	**0.0903**	**3.9634**	**1.0572**	**0.0859**	**1.1431**	**72.8538**	**5,620.1862**	**5,693.0400**	**5.3917**	**0.0541**	**5,843.9609**

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	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	8.0000e-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	317.3894	317.3894	0.0165	3.8500e-003	318.9513
Mobile	1.3769	13.5321	16.0509	0.0556	3.8731	0.0882	3.9613	1.0572	0.0837	1.1409	0.0000	5,109.0598	5,109.0598	0.1948	0.0000	5,113.9303
Waste						0.0000	0.0000		0.0000	0.0000	26.5218	0.0000	26.5218	1.5674	0.0000	65.7066
Water						0.0000	0.0000		0.0000	0.0000	15.8482	155.1330	170.9812	1.6364	0.0402	223.8756
Total	**2.6126**	**13.5599**	**16.0888**	**0.0557**	**3.8731**	**0.0903**	**3.9634**	**1.0572**	**0.0859**	**1.1431**	**42.3700**	**5,581.6104**	**5,623.9804**	**3.4152**	**0.0441**	**5,722.4939**

	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	41.84	0.69	1.21	36.66	18.57	2.08

2.3 Vegetation

Vegetation

	CO2e
Category	MT
New Trees	708.0000
Total	**708.0000**

3.0 Construction Detail

Construction Phase

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	8/11/2020	5	100	
5	Architectural Coating	Architectural Coating	6/1/2020	8/31/2020	5	66	
6	Paving	Paving	8/12/2020	8/31/2020	5	14	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 175

Acres of Paving: 19.77

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 415,238; Non-Residential Outdoor: 138,413; Striped Parking Area:

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	4	8.00	158	0.38
Grading	Graders	2	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	4	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
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
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Architectural Coating	Air Compressors	2	6.00	78	0.48
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38

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
Demolition	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
Grading	13	20.00	0.00	54.00	14.70	6.90	10.00	LD_Mix	HDT_Mix	HHDT

Building Construction	9	664.00	260.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	2	133.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Replace Ground Cover

Water Exposed Area

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					
Fugitive Dust	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
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**

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					
Fugitive Dust	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
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**

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**

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					7.7200e-003	0.0000	7.7200e-003	4.2500e-003	0.0000	4.2500e-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**	**7.7200e-003**	**2.2000e-003**	**9.9200e-003**	**4.2500e-003**	**2.0200e-003**	**6.2700e-003**	**0.0000**	**3.3431**	**3.3431**	**1.0800e-003**	**0.0000**	**3.3701**

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					0.1982	0.0000	0.1982	0.0680	0.0000	0.0680	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**	**0.1982**	**0.0617**	**0.2599**	**0.0680**	**0.0568**	**0.1247**	**0.0000**	**168.0105**	**168.0105**	**0.0543**	**0.0000**	**169.3690**

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					0.0847	0.0000	0.0847	0.0291	0.0000	0.0291	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**	**0.0847**	**0.0617**	**0.1465**	**0.0291**	**0.0568**	**0.0858**	**0.0000**	**168.0103**	**168.0103**	**0.0543**	**0.0000**	**169.3688**

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	0.1060	0.9593	0.8424	1.3500e-003		0.0559	0.0559		0.0525	0.0525	0.0000	115.8050	115.8050	0.0283	0.0000	116.5113
Total	**0.1060**	**0.9593**	**0.8424**	**1.3500e-003**		**0.0559**	**0.0559**		**0.0525**	**0.0525**	**0.0000**	**115.8050**	**115.8050**	**0.0283**	**0.0000**	**116.5113**

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	0.0403	1.3878	0.2902	3.4700e-003	0.0820	6.3500e-003	0.0883	0.0237	6.0700e-003	0.0297	0.0000	331.9122	331.9122	0.0230	0.0000	332.4864
Worker	0.1640	0.1289	1.2877	3.4500e-003	0.3640	2.4300e-003	0.3665	0.0967	2.2400e-003	0.0989	0.0000	312.0203	312.0203	9.3700e-003	0.0000	312.2545
Total	**0.2043**	**1.5167**	**1.5779**	**6.9200e-003**	**0.4460**	**8.7800e-003**	**0.4548**	**0.1203**	**8.3100e-003**	**0.1287**	**0.0000**	**643.9325**	**643.9325**	**0.0323**	**0.0000**	**644.7409**

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	0.1060	0.9593	0.8424	1.3500e-003		0.0559	0.0559		0.0525	0.0525	0.0000	115.8049	115.8049	0.0283	0.0000	116.5112
Total	**0.1060**	**0.9593**	**0.8424**	**1.3500e-003**		**0.0559**	**0.0559**		**0.0525**	**0.0525**	**0.0000**	**115.8049**	**115.8049**	**0.0283**	**0.0000**	**116.5112**

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	0.0403	1.3878	0.2902	3.4700e-003	0.0785	6.3500e-003	0.0848	0.0228	6.0700e-003	0.0289	0.0000	331.9122	331.9122	0.0230	0.0000	332.4864
Worker	0.1640	0.1289	1.2877	3.4500e-003	0.3451	2.4300e-003	0.3475	0.0920	2.2400e-003	0.0943	0.0000	312.0203	312.0203	9.3700e-003	0.0000	312.2545
Total	**0.2043**	**1.5167**	**1.5779**	**6.9200e-003**	**0.4236**	**8.7800e-003**	**0.4324**	**0.1148**	**8.3100e-003**	**0.1231**	**0.0000**	**643.9325**	**643.9325**	**0.0323**	**0.0000**	**644.7409**

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	1.4648					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	**1.4808**	**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**

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	0.0217	0.0170	0.1702	4.6000e-004	0.0481	3.2000e-004	0.0485	0.0128	3.0000e-004	0.0131	0.0000	41.2487	41.2487	1.2400e-003	0.0000	41.2797
Total	**0.0217**	**0.0170**	**0.1702**	**4.6000e-004**	**0.0481**	**3.2000e-004**	**0.0485**	**0.0128**	**3.0000e-004**	**0.0131**	**0.0000**	**41.2487**	**41.2487**	**1.2400e-003**	**0.0000**	**41.2797**

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	1.4648					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	**1.4808**	**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**

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	0.0217	0.0170	0.1702	4.6000e-004	0.0456	3.2000e-004	0.0459	0.0122	3.0000e-004	0.0125	0.0000	41.2487	41.2487	1.2400e-003	0.0000	41.2797
Total	**0.0217**	**0.0170**	**0.1702**	**4.6000e-004**	**0.0456**	**3.2000e-004**	**0.0459**	**0.0122**	**3.0000e-004**	**0.0125**	**0.0000**	**41.2487**	**41.2487**	**1.2400e-003**	**0.0000**	**41.2797**

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	9.5000e-003	0.0985	0.1026	1.6000e-004		5.2700e-003	5.2700e-003		4.8500e-003	4.8500e-003	0.0000	14.0198	14.0198	4.5300e-003	0.0000	14.1331
Paving	0.0259					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0354**	**0.0985**	**0.1026**	**1.6000e-004**		**5.2700e-003**	**5.2700e-003**		**4.8500e-003**	**4.8500e-003**	**0.0000**	**14.0198**	**14.0198**	**4.5300e-003**	**0.0000**	**14.1331**

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	5.2000e-004	4.1000e-004	4.0700e-003	1.0000e-005	1.1500e-003	1.0000e-005	1.1600e-003	3.1000e-004	1.0000e-005	3.1000e-004	0.0000	0.9868	0.9868	3.0000e-005	0.0000	0.9876
Total	**5.2000e-004**	**4.1000e-004**	**4.0700e-003**	**1.0000e-005**	**1.1500e-003**	**1.0000e-005**	**1.1600e-003**	**3.1000e-004**	**1.0000e-005**	**3.1000e-004**	**0.0000**	**0.9868**	**0.9868**	**3.0000e-005**	**0.0000**	**0.9876**

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	9.5000e-003	0.0985	0.1026	1.6000e-004		5.2700e-003	5.2700e-003		4.8500e-003	4.8500e-003	0.0000	14.0197	14.0197	4.5300e-003	0.0000	14.1331

Paving	0.0259					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0354**	**0.0985**	**0.1026**	**1.6000e-004**		**5.2700e-003**	**5.2700e-003**		**4.8500e-003**	**4.8500e-003**	**0.0000**	**14.0197**	**14.0197**	**4.5300e-003**	**0.0000**	**14.1331**

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	5.2000e-004	4.1000e-004	4.0700e-003	1.0000e-005	1.0900e-003	1.0000e-005	1.1000e-003	2.9000e-004	1.0000e-005	3.0000e-004	0.0000	0.9868	0.9868	3.0000e-005	0.0000	0.9876
Total	**5.2000e-004**	**4.1000e-004**	**4.0700e-003**	**1.0000e-005**	**1.0900e-003**	**1.0000e-005**	**1.1000e-003**	**2.9000e-004**	**1.0000e-005**	**3.0000e-004**	**0.0000**	**0.9868**	**0.9868**	**3.0000e-005**	**0.0000**	**0.9876**

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	1.3769	13.5321	16.0509	0.0556	3.8731	0.0882	3.9613	1.0572	0.0837	1.1409	0.0000	5,109.0598	5,109.0598	0.1948	0.0000	5,113.9303

Unmitigated	1.3769	13.5321	16.0509	0.0556	3.8731	0.0882	3.9613	1.0572	0.0837	1.1409	0.0000	5,109.0598	5,109.0598	0.1948	0.0000	5,113.9303

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	365.00	365.00	365.00	789,438	789,438
Unrefrigerated Warehouse-No Rail	2,118.55	2,118.55	2118.55	9,079,509	9,079,509
Total	2,483.55	2,483.55	2,483.55	9,868,947	9,868,947

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 Rail	16.60	8.40	6.90	59.00	0.00	41.00	92	5	3

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Parking Lot	0.546179	0.037976	0.179086	0.122965	0.018430	0.005460	0.017497	0.061396	0.001337	0.001657	0.006117	0.000817	0.001082
Regional Shopping Center	0.546179	0.037976	0.179086	0.122965	0.018430	0.005460	0.017497	0.061396	0.001337	0.001657	0.006117	0.000817	0.001082
Unrefrigerated Warehouse-No Rail	0.227299	0.037976	0.179086	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	287.3000	287.3000	0.0160	3.3000e-003	288.6831
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	287.3000	287.3000	0.0160	3.3000e-003	288.6831
NaturalGas Mitigated	3.0400e-003	0.0276	0.0232	1.7000e-004		2.1000e-003	2.1000e-003		2.1000e-003	2.1000e-003	0.0000	30.0894	30.0894	5.8000e-004	5.5000e-004	30.2682
NaturalGas Unmitigated	3.0400e-003	0.0276	0.0232	1.7000e-004		2.1000e-003	2.1000e-003		2.1000e-003	2.1000e-003	0.0000	30.0894	30.0894	5.8000e-004	5.5000e-004	30.2682

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	541655	2.9200e-003	0.0266	0.0223	1.6000e-004		2.0200e-003	2.0200e-003		2.0200e-003	2.0200e-003	0.0000	28.9048	28.9048	5.5000e-004	5.3000e-004	29.0765
Total		**3.0400e-003**	**0.0276**	**0.0232**	**1.7000e-004**		**2.1000e-003**	**2.1000e-003**		**2.1000e-003**	**2.1000e-003**	**0.0000**	**30.0894**	**30.0894**	**5.7000e-004**	**5.5000e-004**	**30.2683**

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	541655	2.9200e-003	0.0266	0.0223	1.6000e-004		2.0200e-003	2.0200e-003		2.0200e-003	2.0200e-003	0.0000	28.9048	28.9048	5.5000e-004	5.3000e-004	29.0765
Total		**3.0400e-003**	**0.0276**	**0.0232**	**1.7000e-004**		**2.1000e-003**	**2.1000e-003**		**2.1000e-003**	**2.1000e-003**	**0.0000**	**30.0894**	**30.0894**	**5.7000e-004**	**5.5000e-004**	**30.2683**

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Parking Lot	457380	108.2963	6.0200e-003	1.2400e-003	108.8176
Regional Shopping Center	126300	29.9047	1.6600e-003	3.4000e-004	30.0487
Unrefrigerated Warehouse-No Rail	629707	149.0990	8.2800e-003	1.7100e-003	149.8168
Total		**287.3000**	**0.0160**	**3.2900e-003**	**288.6831**

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Parking Lot	457380	108.2963	6.0200e-003	1.2400e-003	108.8176
Regional Shopping Center	126300	29.9047	1.6600e-003	3.4000e-004	30.0487

Unrefrigerated Warehouse-No Rail	629707	149.0990	8.2800e-003	1.7100e-003	149.8168
Total		**287.3000**	**0.0160**	**3.2900e-003**	**288.6831**

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	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	8.0000e-005	0.0000	0.0301
Unmitigated	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	8.0000e-005	0.0000	0.0301

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	0.1465					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	1.0848					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	1.3700e-003	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	8.0000e-005	0.0000	0.0301

Total	**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**	**8.0000e-005**	**0.0000**	**0.0301**

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	0.1465					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	1.0848					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	1.3700e-003	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	8.0000e-005	0.0000	0.0301
Total	**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**	**8.0000e-005**	**0.0000**	**0.0301**

7.0 Water Detail

7.1 Mitigation Measures Water

Install Low Flow Bathroom Faucet

Install Low Flow Kitchen Faucet

Install Low Flow Toilet

Install Low Flow Shower

Use Water Efficient Irrigation System

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			

Mitigated	170.9812	1.6364	0.0402	223.8756
Unmitigated	213.5189	2.0455	0.0503	279.6360

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	3.7130	0.0243	6.1000e-004	4.5029
Unrefrigerated Warehouse-No Rail	61.7021 / 0	209.8060	2.0211	0.0497	275.1331
Total		**213.5189**	**2.0455**	**0.0503**	**279.6360**

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	0.59258 / 0.426299	3.1364	0.0195	4.9000e-004	3.7692
Unrefrigerated Warehouse-No Rail	49.3617 / 0	167.8448	1.6169	0.0397	220.1065
Total		**170.9811**	**1.6364**	**0.0402**	**223.8756**

8.0 Waste Detail

8.1 Mitigation Measures Waste

Institute Recycling and Composting Services

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	26.5218	1.5674	0.0000	65.7066
Unmitigated	53.0436	3.1348	0.0000	131.4132

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	250.81	50.9122	3.0088	0.0000	126.1327
Total		**53.0436**	**3.1348**	**0.0000**	**131.4132**

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	5.25	1.0657	0.0630	0.0000	2.6402
Unrefrigerated Warehouse-No Rail	125.405	25.4561	1.5044	0.0000	63.0664
Total		**26.5218**	**1.5674**	**0.0000**	**65.7066**

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
	0	0.00	0			Diesel

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

	Total CO2	CH4	N2O	CO2e
Category	MT			
Unmitigated	708.0000	0.0000	0.0000	708.0000

11.2 Net New Trees

Species Class

	Number of Trees	Total CO2	CH4	N2O	CO2e
		MT			
Miscellaneous	1000	708.0000	0.0000	0.0000	708.0000
Total		**708.0000**	**0.0000**	**0.0000**	**708.0000**

Bridge Point Upland - Existing Rock Crushing

San Bernardino-South Coast County, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
User Defined Industrial	40.00	User Defined Unit	40.00	0.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	32
Climate Zone	10			**Operational Year**	2019
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 - Rock crushing on approx. 40 acre site

Construction Phase - current operation

Off-road Equipment - current-onsite equipment, cone, jaw, screen, loaders, stackers, water trucks

Trips and VMT - approximately 78 trucks per day one way

Grading - Approximately 78 trucks per day one way

Construction Off-road Equipment Mitigation - Per SCAQMD Rule 403

Architectural Coating -

Vehicle Trips -

Table Name	Column Name	Default Value	New Value
tblConstDustMitigation	CleanPavedRoadPercentReduction	0	6
tblConstDustMitigation	WaterUnpavedRoadMoistureContent	0	12
tblConstDustMitigation	WaterUnpavedRoadVehicleSpeed	0	15
tblConstructionPhase	NumDays	75.00	261.00
tblGrading	MaterialExported	0.00	1,248.00
tblLandUse	LotAcreage	0.00	40.00
tblOffRoadEquipment	HorsePower	168.00	350.00
tblOffRoadEquipment	HorsePower	168.00	300.00
tblOffRoadEquipment	HorsePower	168.00	100.00
tblOffRoadEquipment	HorsePower	203.00	375.00
tblOffRoadEquipment	HorsePower	203.00	300.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	0.00
tblTripsAndVMT	HaulingTripNumber	156.00	40,761.00

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					
2019	0.7730	11.8591	5.0004	0.0259	0.3866	0.2981	0.6848	0.1059	0.2779	0.3838	0.0000	2,427.9968	2,427.9968	0.3426	0.0000	2,436.5619

Maximum	**0.7730**	**11.8591**	**5.0004**	**0.0259**	**0.3866**	**0.2981**	**0.6848**	**0.1059**	**0.2779**	**0.3838**	**0.0000**	**2,427.9968**	**2,427.9968**	**0.3426**	**0.0000**	**2,436.5619**

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					
2019	0.7730	11.8591	5.0004	0.0259	0.3689	0.2981	0.6671	0.1015	0.2779	0.3794	0.0000	2,427.9958	2,427.9958	0.3426	0.0000	2,436.5608
Maximum	**0.7730**	**11.8591**	**5.0004**	**0.0259**	**0.3689**	**0.2981**	**0.6671**	**0.1015**	**0.2779**	**0.3794**	**0.0000**	**2,427.9958**	**2,427.9958**	**0.3426**	**0.0000**	**2,436.5608**

	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**	**4.58**	**0.00**	**2.59**	**4.11**	**0.00**	**1.13**	**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	**2-11-2019**	**5-10-2019**	3.0469	3.0469
2	**5-11-2019**	**8-10-2019**	3.1439	3.1439
3	**8-11-2019**	**9-30-2019**	1.7428	1.7428
		Highest	3.1439	3.1439

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	5.0000e-005	0.0000	5.2000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	9.9000e-004	9.9000e-004	0.0000	0.0000	1.0600e-003
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**5.0000e-005**	**0.0000**	**5.2000e-004**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**9.9000e-004**	**9.9000e-004**	**0.0000**	**0.0000**	**1.0600e-003**

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	5.0000e-005	0.0000	5.2000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	9.9000e-004	9.9000e-004	0.0000	0.0000	1.0600e-003
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**5.0000e-005**	**0.0000**	**5.2000e-004**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**9.9000e-004**	**9.9000e-004**	**0.0000**	**0.0000**	**1.0600e-003**

	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

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Grading	Grading	1/1/2019	12/31/2019	5	261	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 0

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Grading	Crushing/Proc. Equipment	1	8.00	85	0.78
Grading	Excavators	0	8.00	158	0.38
Grading	Graders	0	8.00	187	0.41
Grading	Off-Highway Trucks	2	4.00	402	0.38
Grading	Other Material Handling Equipment	1	8.00	350	0.40
Grading	Other Material Handling Equipment	1	8.00	300	0.40
Grading	Other Material Handling Equipment	3	8.00	100	0.40
Grading	Rubber Tired Dozers	0	8.00	247	0.40
Grading	Rubber Tired Loaders	1	8.00	375	0.36
Grading	Rubber Tired Loaders	1	8.00	300	0.36
Grading	Scrapers	0	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	0	8.00	97	0.37

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

Grading	10	25.00	0.00	40,761.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Replace Ground Cover

Water Exposed Area

Water Unpaved Roads

Reduce Vehicle Speed on Unpaved Roads

Clean Paved Roads

3.2 Grading - 2019

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					7.0000e-005	0.0000	7.0000e-005	1.0000e-005	0.0000	1.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.6164	6.3197	4.0303	9.5900e-003		0.2797	0.2797		0.2603	0.2603	0.0000	857.8225	857.8225	0.2529	0.0000	864.1445
Total	**0.6164**	**6.3197**	**4.0303**	**9.5900e-003**	**7.0000e-005**	**0.2797**	**0.2798**	**1.0000e-005**	**0.2603**	**0.2603**	**0.0000**	**857.8225**	**857.8225**	**0.2529**	**0.0000**	**864.1445**

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	0.1391	5.5251	0.8296	0.0160	0.3508	0.0182	0.3690	0.0963	0.0174	0.1137	0.0000	1,538.5260	1,538.5260	0.0887	0.0000	1,540.7428

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	0.0175	0.0143	0.1405	3.5000e-004	0.0358	2.5000e-004	0.0360	9.5000e-003	2.3000e-004	9.7300e-003	0.0000	31.6484	31.6484	1.0500e-003	0.0000	31.6745
Total	**0.1566**	**5.5394**	**0.9701**	**0.0163**	**0.3866**	**0.0184**	**0.4050**	**0.1058**	**0.0176**	**0.1235**	**0.0000**	**1,570.1744**	**1,570.1744**	**0.0897**	**0.0000**	**1,572.4173**

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					3.0000e-005	0.0000	3.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.6164	6.3197	4.0303	9.5900e-003		0.2797	0.2797		0.2603	0.2603	0.0000	857.8214	857.8214	0.2529	0.0000	864.1435
Total	**0.6164**	**6.3197**	**4.0303**	**9.5900e-003**	**3.0000e-005**	**0.2797**	**0.2797**	**0.0000**	**0.2603**	**0.2603**	**0.0000**	**857.8214**	**857.8214**	**0.2529**	**0.0000**	**864.1435**

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	0.1391	5.5251	0.8296	0.0160	0.3350	0.0182	0.3532	0.0925	0.0174	0.1099	0.0000	1,538.5260	1,538.5260	0.0887	0.0000	1,540.7428
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	0.0175	0.0143	0.1405	3.5000e-004	0.0339	2.5000e-004	0.0342	9.0400e-003	2.3000e-004	9.2700e-003	0.0000	31.6484	31.6484	1.0500e-003	0.0000	31.6745
Total	**0.1566**	**5.5394**	**0.9701**	**0.0163**	**0.3689**	**0.0184**	**0.3873**	**0.1015**	**0.0176**	**0.1191**	**0.0000**	**1,570.1744**	**1,570.1744**	**0.0897**	**0.0000**	**1,572.4173**

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	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
User Defined Industrial	0.00	0.00	0.00		
Total	0.00	0.00	0.00		

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
User Defined Industrial	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
User Defined Industrial	0.541740	0.038987	0.178620	0.126833	0.019742	0.005671	0.017070	0.060066	0.001326	0.001715	0.006244	0.000823	0.001163

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	0.0000	0.0000	0.0000	0.0000	0.0000
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Mitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Unmitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

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					
User Defined Industrial	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
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**

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					
User Defined Industrial	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
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**

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e

Land Use	kWh/yr	MT/yr			
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

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	5.0000e-005	0.0000	5.2000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	9.9000e-004	9.9000e-004	0.0000	0.0000	1.0600e-003
Unmitigated	5.0000e-005	0.0000	5.2000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	9.9000e-004	9.9000e-004	0.0000	0.0000	1.0600e-003

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	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

Consumer Products	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	5.0000e-005	0.0000	5.2000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	9.9000e-004	9.9000e-004	0.0000	0.0000	1.0600e-003
Total	**5.0000e-005**	**0.0000**	**5.2000e-004**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**9.9000e-004**	**9.9000e-004**	**0.0000**	**0.0000**	**1.0600e-003**

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	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	5.0000e-005	0.0000	5.2000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	9.9000e-004	9.9000e-004	0.0000	0.0000	1.0600e-003
Total	**5.0000e-005**	**0.0000**	**5.2000e-004**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**9.9000e-004**	**9.9000e-004**	**0.0000**	**0.0000**	**1.0600e-003**

7.0 Water Detail

7.1 Mitigation Measures Water

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
User Defined Industrial	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
User Defined Industrial	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			

User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

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

GHG Emissions Reductions from Electric Forklifts
Bridge Point Upland Project
Upland, California

Number of Equipment[1]	Hours per Day[1]	Days per Year[1]	Equipment Size[2] (hp)	Equipment Size (kW)	Load Factor[2]	SCE electricity emission factor[3] (MT CO_2e/MWh)	Emissions (MT CO_2e/year)
12	8	365	89	66.4	0.2	0.24	110.6

Notes:
[1] Project-specific data.
[2] Equipment size and load factors based on CalEEMod Appendix D, Table 3.3.
[3] CO_2e intensity factor for SCE accounts for the 33% projected RPS for 2020 consistent with SB 100.

Conversion Factors:

0.7457 kW/hp
1000 kW/MW

GHG Emissions Reductions for Electric Vehicle Charging Stations
Bridge Point Upland Project
Upland, California

Estimating GHG Emissions Reduction to Replace Gasoline Vehicle with Electric Vehicle		
	Worker Chargers	
SCE electricity emission factor[1]	0.24	(MT CO_2e/MWh)
Fuel Economy of Electric Vehicle[2]	0.25	(kWh/mile)
Electric Vehicle GHG Emissions[3]	59	(gms/mile)
Gasoline/Diesel CO_2 emission while running[4]	312	(gms/mile)
GHG Emissions Reduction from Additional Electric Vehicles, per mile	252	(gms/mile)
Annual Energy Delivery per Parking Spot[4]	7,056	(kWh/charging station/year)
Annual VMT Displacement per Parking Spot[5]	28,224	(miles/charging station/year)
GHG Reduction per Parking Space with Charging per Year	7.1	(MT CO_2e/charging station/year)
Estimated Benefit from Installing Off-Site and Commercial Electric Vehicle Charging Stations		
Number of On-Site Parking Spots Provided Chargers[6]	30	(charging stations)
Annual VMT Displacement at On-Site Commercial Stations (Based on Charge)	846,720	(miles/year)
GHG Emissions Reduction from On-Site Commercial Parking Spots[7]	214	(MT CO_2e/year)

Notes:

[1] CO2e intensity factor for SCE accounts for the 33% projected RPS for 2020 consistent with SB 100.

[2] National Renewable Energy Laboratory (NREL), 2018. California Plug-In Electric Vehicle Infrastructure Projections: 2017-2025 (Table C.1). Available at: https://www.nrel.gov/docs/fy18osti/70893.pdf. Accessed: January 2020.

[3] Electric vehicle GHG emissions per mile are estimated based on the SCE electricity emission factor (MT CO_2e/MWh) and the fuel economy of electric vehicles (kWh/mile).

[4] EMFAC2014 running and starting exhaust emission rate for CO_2 for vehicles in San Bernardino County (South Coast), aggregated for all models and speeds, averaged over all seasons for 2021. For worker chargers, uses light duty gasoline- and diesel-powered vehicle types. Available at: http://www.arb.ca.gov/emfac/. Accessed: January 2020.

[5] Annual Energy Delivery and VMT reduction based on an average monthly energy delivery of 588 kWh per charging station for conventional Level 2 chargers, as estimated by the California Energy Commission. Available at: https://www.energy.ca.gov/2018publications/CEC-500-2018-020/CEC-500-2018-020.pdf. Annual VMT displacement per parking spot is the total kWh per month multiplied by the fuel economy in miles per kWh.

[6] Number of charging stations based on project commitment.

[7] GHG emissions reductions are calculated as the difference between GHG emissions of gasoline/diesel vehicles and GHG emissions of electric vehicles multiplied by the annual VMT displacement charging stations.

Abbreviations:

CARB - California Air Resources Board
CH_4 - methane
CO_2 - carbon dioxide
CO_2e - carbon dioxide equivalents
EMFAC - California Air Resources Board Emissions Factor Model
EV - electric vehicle
GHG - greenhouse gases
gms - grams
kWh - kilowatt-hour
MT - metric tonnes
MWh - megawatt-hour
SCE - Southern California Edison
TDM - Transportation Demand Management
VMT - vehicle miles traveled

work days per year	261
lb/MT	2204.62
MT/gram	1.00E-06
MWh to KWh	0.001

GHG Emissions Reduction from Rooftop Solar Photovoltaic Panels
Bridge Point Upland Project
Upland, California

Parameters		Units
Project Electricity Use	1,213	MWh/yr
Percent of Project Electricity covered by Solar	100%	
System Size[1]	0.75	MW
NREL Panel Size	1	kW/m^2
NREL Panel Efficiency	15%	
Panel Size[1]	13.9	kW/1000 sqft Panel
Solar Panel Module Area[2]	53,820	sqft
System Generation[2]	1,217	MWh/year
Electricity Intensity Factor[3]	524	lb CO_2e/MWh
Annual GHG Emission Reduction	**289**	**MT CO_2e/yr**

Notes

[1] System size based on Project-specific data.

[2] System generation was determined using default commercial rooftop solar array assumptions in the National Renewable Energy Laboratory's PVWatts tool. Available at: http://pvwatts.nrel.gov/pvwatts.php.

[3] CO_2e weighted intensity factor for SCE accounts for CO_2, N_2O, and CH_4 emissions rates under the 33% RPS for 2020.

Abbreviations

CO_2e - carbon dioxide equivalents
GHG - greenhouse gases
kW - kilowatt
kWh - kilowatt-hour
lb - pound
MT - metric tonnes
MWh - megawatt-hour
RPS - Renewable Portfolio Standards
SCE - Southern California Edison
sqft - square feet
yr - year
PV - photovoltaic

Conversion Factors:

lb/MT	2204.62
MT/gram	1.00E-06
MWh to KWh	0.001
(lbs CO2e/MWh delivered)	524.45
ft/m	3.28

lbs CO_2/MWh delivered	522	2020 RPS (33%)
CH_4 Intensity (lb/MWhr)	0.029	25
N_2O Intensity (lb/MWhr)	0.00617	298

Attachment 3

Health Risk Assessment

Kimley»Horn

MEMORANDUM

To: Michael Poland, Contract Planning Manager

From: Ryan Chiene

Ace Malisos

Kimley-Horn and Associates, Inc.

Date: January 23, 2020

Subject: Health Risk Assessment for Bridge Point Upland Project

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EXECUTIVE SUMMARY

A Health Risk Assessment (HRA) was prepared for the proposed Project consistent with the California Office of Environmental Health Hazard Assessment (OEHHA) *Air Toxics Hot Spots Program Risk Assessment Guidance Manual for Preparation of Health Risk Assessments (*February 2015) and the South Coast Air Quality Management District (SCAQMD) Modeling Guidance for AERMOD.[1] Air dispersion modeling was conducted using the Environmental Protection Agency (EPA) approved AERMOD model. As discussed below, the modeled cancer risk would be 1.92 in one million, which is below the SCAQMD threshold of 10 in one million and impacts would be less than significant. Additionally, non-carcinogenic hazards are calculated to be within acceptable limits. Therefore, impacts related to health risk from the Project would be less than significant.

1.0 INTRODUCTION

1.1 Purpose

Health Risk Assessments (HRAs) are typically required for projects that are within 1,000 feet of sensitive receptors and have more than 100 trucks per day, or 200 truck trips. The truck court on the Project site would be approximately 2,000 feet (i.e., more than 1,000 feet) from the closest sensitive receptors. The Project would have only 25 trucks per day, or 50 truck trips, which is much lower than 100 trucks per day, or 200 truck trips. This is because 98 percent of the Project's vehicle trips would be automobiles or vans and not heavy-duty diesel trucks, which are the primary generators of the diesel particulate matter (DPM) analyzed in HRAs. Therefore, an HRA is not required for the Project. Nonetheless, in response to comments requesting one, an HRA was performed as described in this memorandum using the EPA-approved AERMOD model and guidance from the SCAQMD and OEHHA.

[1] South Coast Air Quality Management District, *SCAQMD Modeling Guidance for AERMOD*, http://www.aqmd.gov/home/air-quality/meteorological-data/modeling-guidance, accessed January 15, 2020.

The purpose of this HRA is to evaluate potential health risks associated with Toxic Air Contaminants (TAC) including DPM from a last mile warehouse/parcel delivery service building in the City of Upland (City). This Health Risk Assessment was prepared in accordance with the requirements of the SCAQMD to identify the health risks likely to occur associated with the proposed Bridge Point Upland Project ("Project" or "proposed Project").

1.2 Project Location

The Project is located in the City of Upland north of Interstate 10 (I-10), south of State Route 210 (SR-210), west of Interstate 15 (I-15), and east of State Route 57 (SR-57). The overall Project site is located on approximately 50.25 acres northeast of Central Avenue and Foothill Boulevard.

The Project site is in a predominately industrial and commercial area. The land uses surrounding the Project site consist of a mix of uses including industrial, commercial, residential, an airport, and a major transportation corridor. Properties zoned for Highway Commercial uses are located immediately south of the site. Foothill Boulevard is located farther south of the site. Foothill Boulevard is located further south of the site. Cable Airport is located directly north of the site and a portion of the airport, along with industrial uses are located west of the site. Commercial uses, including a Lowe's Home Improvement Store and a commercial shopping center, are located east of the site. The closest sensitive receptors to the Project site include multi-family residences approximately 1,040 feet southeast of the site, a church approximately 1,050 feet south of the site, and single-family housing approximately 1,190 feet east of the site.

1.2 Project Description

The proposed Project is comprised of one warehouse/ parcel delivery service building with an ancillary office/retail space on approximately 50.25 acres. The Project site is located on Assessor Parcel Nos. (APN) 1006-351-09, 1006-351-10, 1006-572-11, 1006-551-12, 1006-551-22, and 1006-574-10. Project entitlement includes a Design Review and Site Plan Review application; a Lot Line Adjustment; and a determination from the Airport Land Use Committee that the Project is compatible with the Cable Airport Land Use Compatibility Plan.

The Project building is proposed to be 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. The office/retail component would include an office area for employees, and a small area for visitors to pick up pre-ordered packages. To be conservative, this analysis evaluates a maximum development scenario that includes a 276,250 sf building.

The western building frontage would include 16 dock-hi doors for trucks, and 8 van loading doors would be located on both the northern and southern building frontages. The Project would require a minimum of 220 automobile parking spaces. Trailer parking for the warehouse building would include approximately 12 stalls and an additional 1,104 van parking stalls would be located on-site.

Vehicular access to the Project would be provided via 13th Street, the north leg of Central Avenue/Foothill Boulevard, and two right-in/right-out driveways on Foothill Boulevard. The driveway on 13th Street would provide access to automobiles and vans only; trucks would access the site only via the driveway at the north leg of Central Avenue/Foothill Boulevard. Street improvements would be provided along Foothill Boulevard at the Project frontage to include improvements to curbs, gutters, sidewalks, street lights, traffic signal equipment and signing and striping as required. Street improvements would also be made to Central Avenue and 13th Street.

2.0 ENVIRONMENTAL SETTING

The California Air Resources Board (CARB) divides the State into 15 air basins that share similar meteorological and topographical features. The Project site lies within the central portion of the South Coast Air Basin (Basin). The Basin is a 6,600-square mile area bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, in addition to the San Gorgonio Pass area in Riverside County. The Basin's terrain and geographical location (i.e., a coastal plain with connecting broad valleys and low hills) determine its distinctive climate.

2.1 Climate

The general region lies in the semi-permanent high-pressure zone of the eastern Pacific. The climate is mild and tempered by cool sea breezes. The usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds. The extent and severity of the air pollution problem in the Basin is a function of the area's natural physical characteristics (weather and topography), as well as man-made influences (development patterns and lifestyle). Factors such as wind, sunlight, temperature, humidity, rainfall, and topography all affect the accumulation and/or dispersion of pollutants throughout the Basin. These factors along with applicable regulations are discussed below.

The average annual temperature varies little throughout the Basin, averaging 75 degrees Fahrenheit (°F). However, with a less-pronounced oceanic influence, the eastern inland portions of the Basin show greater variability in annual minimum and maximum temperatures. All portions of the Basin have had recorded temperatures over 100°F in recent years.

2.2 Meteorology

Although the Basin has a semi-arid climate, the air near the surface is moist due to the presence of a shallow marine layer. Except for infrequent periods when dry, continental air is brought into the Basin by offshore winds, the ocean effect is dominant. Periods with heavy fog are frequent, and low stratus clouds, occasionally referred to as "high fog," are a characteristic climate feature. Annual average relative humidity is 70 percent at the coast and 57 percent in the eastern part of the Basin. Precipitation in the Basin is typically nine to 14 inches annually and is rarely in the form of snow or

hail due to typically warm weather. The frequency and amount of rainfall is greater in the coastal areas of the Basin.

A temperature inversion is defined as an increase in temperature with height, or to the layer within which such an increase occurs. The height of the inversion is important in determining pollutant concentration. When the inversion is approximately 2,500 feet above sea level, the sea breezes carry the pollutants inland to escape over the mountain slopes or through the passes. At a height of 1,200 feet, the terrain prevents the pollutants from entering the upper atmosphere, resulting in a settlement in the foothill communities. Below 1,200 feet, the inversion puts a tight lid on pollutants, concentrating them in a shallow layer over the entire coastal basin. Usually, inversions are lower before sunrise than during the day. Mixing heights for inversions are lower in the summer and more persistent, being partly responsible for the high levels of ozone (O_3) observed during summer months in the Basin. Smog in southern California is generally the result of these temperature inversions combining with coastal day winds and local mountains to contain the pollutants for long periods of time, allowing them to form secondary pollutants by reacting with sunlight. The Basin has a limited ability to disperse these pollutants due to typically low wind speeds.

The area in which the Project is located offers clear skies and sunshine, yet is still susceptible to air inversions. These inversions trap a layer of stagnant air near the ground, where it is then further loaded with pollutants. These inversions cause haziness, which is caused by moisture, suspended dust, and a variety of chemical aerosols emitted by trucks, automobiles, furnaces, and other sources.

2.3 Toxic Air Contaminants

Toxic Air Contaminants (TACs) are airborne substances capable of causing short-term (acute) and long-term (chronic or carcinogenic, i.e., cancer causing) adverse human health effects (i.e., injury or illness). TACs include both organic and inorganic chemical substances. They may be emitted from a variety of common sources including gasoline stations, automobiles, dry cleaners, industrial operations, and painting operations. The current California list of TACs includes approximately 200 compounds, including particulate emissions from diesel-fueled engines.

Hazardous Air Pollutants (HAP) is a term used by the Federal Clean Air Act (FCAA) that includes a variety of pollutants generated or emitted by industrial production activities. Identified as TACs under the California Clean Air Act (CCAA), have been singled out through ambient air quality data as being the most substantial health risk in California. Direct exposure to these pollutants has been shown to cause cancer, birth defects, damage to the brain and nervous system, and respiratory disorders. The California Air Resources Board (CARB) provides emission inventories for only the larger air basins.

Industrial facilities and mobile sources are significant sources of TACs. In addition to industrial sources, various common urban facilities also produce TAC emissions, such as gasoline stations (benzene), hospitals (ethylene oxide), and dry cleaners (perchloroethylene). Automobile exhaust also contains TACs such as benzene and 1,3-butadiene. Diesel particulate matter (DPM) was identified as a TAC by CARB in 1998. DPM differs from other TACs in that it is not a single substance but rather a complex mixture of hundreds of substances. BAAQMD research indicates that mobile-source emissions of

DPM, benzene, and 1,3-butadiene represent a substantial portion of the ambient background risk from TACs in the SFBAAB.

TACs do not have ambient air quality standards because no safe levels of TACs can be determined. Instead, TAC impacts are evaluated by calculating the health risks associated with a given exposure. The requirements of the Air Toxic "Hot Spots" Information and Assessment Act (Assembly Bill [AB] 2588) apply to facilities that use, produce, or emit toxic chemicals. Facilities subject to the toxic emission inventory requirements of the act must prepare and submit toxic emission inventory plans and reports, and periodically update those reports.

Toxic contaminants often result from fugitive emissions during fuel storage and transfer activities, and from leaking valves and pipes. For example, the electronics industry, including semiconductor manufacturing, uses highly toxic chlorinated solvents in semiconductor production processes. Sources of air toxics go beyond industry, however. Automobile exhaust also contains toxic air pollutants such as benzene and 1,3-butadiene.

In California, on-road diesel-fueled engines contribute approximately 24 percent of the statewide total DPM emissions, with an additional 71 percent attributed to other mobile sources such as construction and mining equipment, agricultural equipment, and transport refrigeration units. Stationary sources contribute about 5 percent of total DPM. CARB has developed several plans and programs to reduce diesel emissions such as the Diesel Risk Reduction Plan (DRRP), the Statewide Portable Equipment Registration Program (PERP), and the Diesel Off-Road Reporting System (DOORS). The PERP and DOORS programs allow owners or operators of portable engines and certain other types of equipment to register their units to operate their equipment throughout California without having to obtain individual permits from local air districts.

As stated above, diesel exhaust and many individual substances contained in it (including arsenic, benzene, formaldehyde, and nickel) have the potential to contribute to mutations in cells that can lead to cancer. Long-term exposure to diesel exhaust particles poses the highest cancer risk of any TAC evaluated by the OEHHA. CARB estimates that about 70 percent of the cancer risk that the average Californian faces from breathing toxic air pollutants stems from diesel exhaust particles.

Exposure to diesel exhaust can have immediate health effects. Diesel exhaust can irritate the eyes, nose, throat, and lungs, and it can cause coughs, headaches, lightheadedness, and nausea. In studies with human volunteers, diesel exhaust particles made people with allergies more susceptible to the materials to which they are allergic, such as dust and pollen. Exposure to diesel exhaust also causes inflammation in the lungs, which may aggravate chronic respiratory symptoms and increase the frequency or intensity of asthma attacks.

Diesel engines are a major source of fine particulate pollution. The elderly and people with emphysema, asthma, and chronic heart and lung disease are especially sensitive to fine-particle pollution. Numerous studies have linked elevated particle levels in the air to increased hospital admissions, emergency room visits, asthma attacks, and premature deaths among those suffering

from respiratory problems. Because children's lungs and respiratory systems are still developing, they are also more susceptible than healthy adults to fine particles. Exposure to fine particles is associated with increased frequency of childhood illnesses and can also reduce lung function in children. California has identified diesel exhaust particles as a carcinogen.

3.0 REGULATORY SETTING

3.1 Federal

Federal Clean Air Act

The Federal Clean Air Act (FCAA) was amended in 1990 to address a large number of air pollutants that are known to cause or may reasonably be anticipated to cause adverse effects to human health or adverse environmental effects. 188 specific pollutants and chemical groups were initially identified as HAPs, and the list has been modified over time. The FCAA Amendments included new regulatory programs to control acid deposition and for the issuance of stationary source operating permits.

In 2001, the U.S. Environmental Protection Agency (EPA) issued its first Mobile Source Air Toxics Rule, which identified 21 mobile source air toxic (MSAT) compounds as being HAPs that required regulation. A subset of six of these MSAT compounds were identified as having the greatest influence on health and included benzene, 1,3-butadiene, formaldehyde, acrolein, acetaldehyde, and DPM. More recently, the EPA issued a second MSAT Rule in February 2007, which generally supported the findings in the first rule and provided additional recommendations of compounds having the greatest impact on health. The rule also identified several engine emission certification standards that must be implemented. Unlike the criteria pollutants, toxics do not have National Ambient Air Quality Standards (NAAQS) making evaluation of their impacts more subjective.

National Emissions Standards for Hazardous Air Pollutants (NESHAPs) were incorporated into a greatly expanded program for controlling toxic air pollutants. The provisions for attainment and maintenance of the NAAQS were substantially modified and expanded. Other revisions included provisions regarding stratospheric ozone protection, increased enforcement authority, and expanded research programs.

Section 112 of the FCAA Amendments governs the federal control program for HAPs. NESHAPs are issued to limit the release of specified HAPs from specific industrial sectors. These standards are technology-based, meaning that they represent the best available control technology an industrial sector could afford. The level of emissions controls required by NESHAPs are not based on health risk considerations because allowable releases and resulting concentrations have not been determined to be safe for the general public. The FCAA does not establish air quality standards for HAPs that define legally acceptable concentrations of these pollutants in ambient air.

Federal Emissions Standards for On-Road Trucks

To reduce emissions from on-road, heavy-duty diesel trucks, the U.S. EPA established a series of increasingly strict emission standards for new engines, starting in 1988. The U.S. EPA promulgated the

final and cleanest standards with the 2007 Heavy-Duty Highway Rule.[2] The PM emission standard of 0.01 gram per horsepower-hour (g/hp-hr) is required for new vehicles beginning with model year 2007. Also, the NO_X and nonmethane hydrocarbon (NMHC) standards of 0.20 g/hp-hr and 0.14 g/hp-hr, respectively, were phased in together between 2007 and 2010 on a percent of sales basis: 50 percent from 2007 to 2009 and 100 percent in 2010.

3.2 State of California

California Air Resources Board

CARB's statewide comprehensive air toxics program was established in 1983 with AB 1807 the Toxic Air Contaminant Identification and Control Act (Tanner Air Toxics Act of 1983). AB 1807 created California's program to reduce exposure to air toxics and sets forth a formal procedure for CARB to designate substances as TACs. Once a TAC is identified, CARB adopts an airborne toxics control measure (ATCM) for sources that emit designated TACs. If there is a safe threshold for a substance at which there is no toxic effect, the control measure must reduce exposure to below that threshold. If there is no safe threshold, the measure must incorporate toxics best available control technology (T-BACT) to minimize emissions.

CARB also administers the state's mobile source emissions control program and oversees air quality programs established by state statute, such as AB 2588, the Air Toxics "Hot Spots" Information and Assessment Act of 1987. Under AB 2588, TAC emissions from individual facilities are quantified and prioritized by the air quality management district or air pollution control district. High priority facilities are required to perform a health risk assessment and, if specific thresholds are exceeded, required to communicate the results to the public in the form of notices and public meetings. In September 1992, the "Hot Spots" Act was amended by Senate Bill (SB) 1731 which required facilities that pose a significant health risk to the community to reduce their risk through a risk management plan.

Diesel Risk Reduction Plan. The identification of DPM as a TAC in 1998 led CARB to adopt the Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles (Risk Reduction Plan) in October 2000. The Risk Reduction Plan's goals include an 85 percent reduction in DPM by 2020 from the 2000 baseline.[3] The Risk Reduction Plan includes regulations to establish cleaner new diesel engines, cleaner in-use diesel engines (retrofits), and cleaner diesel fuel.

Truck and Bus Regulation Reducing Emissions from Existing Diesel Vehicles. On December 12, 2008, CARB approved the Truck and Bus Regulation to significantly reduce particulate matter (PM) and oxides of nitrogen (NO_X) emissions from existing diesel vehicles operating in California. The regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Heavier trucks must be retrofitted with PM filters beginning January 1, 2012, and older trucks must

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[2] United States Environmental Protection Agency (U.S. EPA), *Control of Air Pollution from New Motor Vehicles: Heavy-Duty Engine and Vehicle Standards and Highway Diesel Fuel Sulfur Control Requirements*, Final Rule. 40 Code of Federal Regulations, Parts 69, 80, and 86. January 18, 2001.

[3] California Air Resources Board, *Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles*, October 2000.

be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses would need to have 2010 model year engines or equivalent.

The regulation applies to nearly all privately and federally-owned diesel fueled trucks and buses and to privately and publicly owned school buses with a gross vehicle weight rating (GVWR) greater than 14,000 pounds. Small fleets with three or fewer diesel trucks can delay compliance for heavier trucks by reporting and there are a number of extensions for low-mileage construction trucks, early PM filter retrofits, adding cleaner vehicles, and other situations. Privately and publicly owned school buses have different requirements.

Heavy-Duty Vehicle Idling Emission Reduction Program. The purpose of the CARB Air Toxic Control Measure (ATCM) to Limit Diesel-Fueled Commercial Motor Vehicle Idling is to reduce public exposure to diesel particulate matter and criteria pollutants by limiting the idling of diesel-fueled commercial vehicles. The driver of any vehicle subject to this ATCM is prohibited from idling the vehicle's primary diesel engine for greater than five minutes at any location and is prohibited from idling a diesel-fueled auxiliary power system (APS) for more than five minutes to power a heater, air conditioner, or any ancillary equipment on the vehicle if it has a sleeper berth and the truck is located within 100 feet of a restricted area (homes and schools).

CARB Final Regulation Order, Requirements to Reduce Idling Emissions from New and In-Use Trucks, beginning in 2008, would require that new 2008 and subsequent model-year heavy-duty diesel engines be equipped with an engine shutdown system that automatically shuts down the engine after 300 seconds of continuous idling operation once the vehicle is stopped, the transmission is set to "neutral" or "park", and the parking brake is engaged.

3.3 Regional

South Coast Air Quality Management District

The California Clean Air Act (CCAA) provides the South Coast Air Quality Management District (SCAQMD) with the authority to manage transportation activities at indirect sources and regulate stationary source emissions. Indirect sources of pollution are generated when minor sources collectively emit a substantial amount of pollution. An example of this would be the motor vehicles at an intersection, a mall, and on highways. As a State agency, CARB regulates motor vehicles and fuels for their emissions.

The Air Toxics Control Plan (March 2000, revised March 26, 2004) is a planning document designed to examine the overall direction of the SCAQMD's air toxics control program. It includes development and implementation of strategic initiatives to monitor and control air toxics emissions. Control strategies that are deemed viable and are within the SCAQMD's jurisdiction will each be brought to the SCAQMD Board for further consideration through the normal public review process. Strategies that are to be implemented by other agencies will be developed in a cooperative effort, and the progress will be reported back to the Board periodically.

The SCAQMD has conducted an in-depth analysis of the toxic air contaminants and their resulting health risks for all of Southern California. This study, the Multiple Air Toxics Exposure Study in the South Coast Air Basin, MATES IV," shows that cancer risk has decreased more than 50 percent between MATES III (2008) and MATES IV (2015).

MATES IV is the most comprehensive dataset documenting the ambient air toxic levels and health risks associated with the South Coast Air Basin emissions. Therefore, MATES IV study represents the baseline health risk for a cumulative analysis. MATES IV estimates the average excess cancer risk level from exposure to TACs is less than 400 in one million basin-wide. These model estimates were based on monitoring data collected at ten fixed sites within the South Coast Air Basin. None of the fixed monitoring sites are within the local area of the Project site. However, MATES IV has extrapolated the excess cancer risk levels throughout the basin by modeling the specific grids. MATES IV modeling predicted an excess cancer risk of 427 in one million for the Project area. DPM is included in this cancer risk along with all other TAC sources. DPM accounts for 68 percent of the total risk shown in MATES IV. The SCAQMD is currently preparing MATES V, which will be the latest comprehensive study of levels of toxic air pollutants the region. MATES V will include an advanced monitoring component with a focus on refinery emissions.

4.0 SIGNIFICANCE CRITERIA AND METHODOLOGY

4.1 Health Risk Analysis Thresholds

Project health risks are determined by examining the types and levels of air toxics generated and the associated impacts on factors that affect air quality. While the final determination of significance thresholds is within the purview of the lead agency pursuant to the State CEQA Guidelines, the SCAQMD recommends that the following air pollution thresholds be used by lead agencies in determining whether the proposed Project is significant. If the lead agency finds that the proposed Project has the potential to exceed the air pollution thresholds, the Project should be considered significant. The thresholds for air toxic emissions are as follows.

- Cancer Risk: Emit carcinogenic or toxic contaminants that exceed the maximum individual cancer risk of 10 in one million.

- Non-Cancer Risk: Emit toxic contaminants that exceed the maximum hazard quotient of 1 in one million.

Cancer risk is expressed in terms of expected incremental incidence per million population. The SCAQMD has established an incidence rate of 10 persons per million as the maximum acceptable incremental cancer risk due to DPM exposure. This threshold serves to determine whether or not a given project has a potentially significant development-specific and cumulative impact. The 10 in one million standard is a health-protective significance threshold. A risk level of 10 in one million implies a likelihood that up to 10 persons, out of one million equally exposed people would contract cancer if exposed to toxic air contaminants over a specified duration of time. This risk would be an excess cancer that is in addition to any cancer risk borne by a person not exposed to these air toxics. To put

this risk in perspective, the risk of dying from accidental drowning is 1,000 in a million which is 100 times more than the SCAQMD's threshold of 10 in one million.

The SCAQMD has also established non-carcinogenic risk parameters for use in health risk assessments (HRAs). Noncarcinogenic risks are quantified by calculating a "hazard index," expressed as the ratio between the ambient pollutant concentration and its toxicity or Reference Exposure Level (REL). An REL is a concentration at or below which health effects are not likely to occur. A hazard index less of than one (1.0) means that adverse health effects are not expected. Within this analysis, non-carcinogenic exposures of less than 1.0 are considered less than significant.

4.2 Methodology

The air dispersion modeling for the HRA was performed using the EPA AERMOD dispersion model and is consistent with the latest SCAQMD and OEHHA guidance.[4,5] AERMOD is a steady-state, multiple-source, Gaussian dispersion model designed for use with emission sources situated in terrain where ground elevations can exceed the stack heights of the emission sources (not a factor in this case). AERMOD requires hourly meteorological data consisting of wind vector, wind speed, temperature, stability class, and mixing height. Surface and upper air meteorological data is provided by the SCAQMD. Surface and upper air meteorological data from the Upland Air Monitoring Station was selected as being the most representative for meteorology based on proximity to the Project site.

The Project would generate 25 heavy-duty trucks per day (50 truck trips), which is lower than the dozens of existing daily truck trips currently generated by the on-site rock crushing operation. Although the Project would reduce truck traffic from the Project site, this HRA conservatively does not take credit for the existing truck trips. Average daily trips from truck traffic to the Project site were obtained from the *Foothill Boulevard Warehouse Traffic Impact Analysis*, prepared by Translutions, October 2019 (herein referenced as the "Traffic Study"). An emission rate for particulate matter less than 10 microns in diameter (PM_{10}) (used as a proxy for DPM) was calculated using trip data from the Traffic Study and a CARB 2017 EMission FACtor model (EMFAC)[6] model run for the South Coast sub-area of San Bernardino County; refer to Appendix A. The emissions rate was calculated using 2020 emissions factors since Project construction would be completed in late-2020. This approach is conservative as it assumes no cleaner technology in future years.

The emission sources in the model are line volume sources (comprised of smaller adjacent volume sources) for the loading dock idling areas, on-site truck circulation, and off-site truck routes. Heavy duty vehicle emissions were assigned a release height of 12 feet (3.66 meters), a plume height of 20.4 feet (6.22 meters). A release height of 12 feet is the average stack height for trucks and the plume height is based on EPA guidance for vehicle volume sources.

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4 South Coast Air Quality Management District, *SCAQMD Modeling Guidance for AERMOD*, http://www.aqmd.gov/home/air-quality/meteorological-data/modeling-guidance, accessed January 15, 2020.

5 California Office of Environmental Health Hazard Assessment, *Air Toxics Hot Spots Program Risk Assessment Guidance Manual for Preparation of Health Risk Assessments*, February 2015.

6 California Air Resources Board, *EMFAC 2017 Web Database,* www.arb.ca.gov/emfac/2017/, accessed January 15, 2020.

AERMOD was run to obtain the peak 1-hour and annual average concentration in micrograms per cubic meter ($\mu g/m^3$) of PM_{10} at the nearby sensitive receptors. According to the SCAQMD's Supplemental Guidelines for Preparing Risk Assessments for AB 2588, air dispersion modeling is required to estimate annual average concentrations to calculate the Maximum Individual Cancer Risk (MICR), the maximum chronic HI, the zones of impact, and excess cancer burden, as well as peak hourly concentrations to calculate the health impact from substances with acute non-cancer health effects. To achieve these goals, extended receptor grids were placed at the property boundaries at the residences in the vicinity of the Project boundary and the Project truck routes to cover the zone of impact. According to the SCAQMD, in order "to identify the maximum impacted receptors (i.e. peak cancer risk and peak hazard indices) a grid spacing of 100 meters or less must be used" (see page 16 of SCAQMD's Supplemental Guidelines). Due to the location and spacing of the nearby sensitive receptors, receptors were modeled with a grid spacing of 50 meters or less. In addition, National Elevation Dataset (NED) terrain data was imported into AERMOD for the Project area. The modeling and analysis was prepared in accordance with the SCAQMD Modeling Guidance for AERMOD.[7]

Note that the concentration estimate developed using this methodology is conservative and is not a specific prediction of the actual concentrations that would occur at the Project site any one point in time. Actual 1-hour and annual average concentrations are dependent on many variables, particularly the number and type of vehicles and equipment operating at specific distances during time periods of adverse meteorology. A health risk computation was performed to determine the risk of developing an excess cancer risk calculated on these worst-case exposure duration scenarios. The chronic and carcinogenic health risk calculations are based on the standardized equations contained in the OEHHA Guidance Manual. Only the risk associated with the worst-case location of the Project was assessed.

5.0 POTENTIAL HEALTH RISK IMPACTS

CARB identified DPM as a TAC in 1998. Mobile sources (including trucks, buses, automobiles, trains, ships, and farm equipment) are by far the largest source of diesel emissions. The exhaust from diesel engines includes hundreds of different gaseous and particulate components, many of which are toxic. Diesel exhaust is composed of two phases, either gas or particulate – both contribute to the risk. The gas phase is composed of many of the urban TACs, such as acetaldehyde, acrolein, benzene, 1,3-butadiene, formaldehyde, and polycyclic aromatic hydrocarbons. The particulate phase has many different types that can be classified by size or composition. The sizes of diesel particulates of greatest health concern are fine and ultrafine particles. These particles may be composed of elemental carbon with adsorbed compounds such as organics, sulfates, nitrates, metals, and other trace elements. Diesel exhaust is emitted from a broad range of on- and off-road diesel engines.

The Project is a last-mile fulfillment center and not a distribution center. The majority of the Project's vehicle trips (approximately 98 percent) would be automobiles or vans and not heavy-duty diesel trucks. HRAs are typically required for projects that are within 1,000 feet of sensitive receptors and have more than 100 trucks per day. As noted above, the Project would generate 25 heavy-duty trucks

[7] South Coast Air Quality Management District, *SCAQMD Modeling Guidance for AERMOD*, http://www.aqmd.gov/home/air-quality/meteorological-data/modeling-guidance, accessed January 15, 2020.

per day. Additionally, the truck court on the project site would be approximately 2,000 feet (i.e., more than 1,000 feet) from the closest sensitive receptors. Therefore, an HRA is not required for the project. Nonetheless, in response to comments requesting an HRA, an analysis of DPM was performed using the EPA-approved AERMOD model.

5.1 Carcinogenic Risk

Vehicle DPM emissions were estimated using emission factors for PM_{10} generated with the EMFAC developed by CARB. EMFAC is a mathematical model that was developed to calculate emission rates from motor vehicles that operate on highways, freeways, and local roads in California and is commonly used by CARB to project changes in future emissions from on-road mobile sources. EMFAC, incorporates regional motor vehicle data, information and estimates regarding the distribution of vehicle miles traveled (VMT) by speed, and number of starts per day. The model includes the emissions benefits of the truck and bus rule and the previously adopted rules for other on-road diesel equipment.

For this Project, annual average PM_{10} emission factors were generated by running EMFAC for vehicles in the SCAQMD within the South Coast portion of San Bernardino County. EMFAC generates emission factors in terms of grams of pollutant emitted per vehicle activity and can calculate a matrix of emission factors at specific values of vehicle speed, temperature, and relative humidity. The model was run for heavy-duty diesel vehicles traveling along Central Avenue (the heavy-duty truck route) and, circulating the Project site, and idling at proposed loading docks.

Based on the AERMOD outputs, the highest expected hourly average diesel PM_{10} emission concentrations from diesel truck traffic near sensitive receptors would be 0.006 µg/m^3. The highest expected annual average diesel PM_{10} emission concentrations near sensitive receptors would be 0.002 µg/m^3. The calculations conservatively assume no cleaner technology with lower emissions in future years. As shown in Table 1: Risk Assessment Results, the highest calculated carcinogenic risk resulting from the Project is 1.92 per million residents. As shown, impacts related to cancer risk would be less than significant at nearby residential communities.

Table 1: Risk Assessment Results

Exposure Scenario	Maximum Cancer Risk (Risk per Million)[1, 2]	Significance Threshold (Risk per Million)	Exceeds Significance Threshold?
Residents	1.92	10	No

1. Refer to Appendix A.
2. The maximum cancer risk would be experienced at the northwest property line of the residential dwellings located on the southwest corner of the North Central Avenue and West 11th Street based on worst-case exposure durations for the Project, 95th percentile breathing rates, and 30-year averaging time.

5.2 Non-Carcinogenic Hazards

The significance thresholds for TAC exposure also require an evaluation of non-cancer risk stated in terms of a hazard index. Non-cancer chronic impacts are calculated by dividing the annual average

concentration by the Reference Exposure Level (REL) for that substance. The REL is defined as the concentration at which no adverse non-cancer health effects are anticipated. The potential for acute non-cancer hazards is evaluated by comparing the maximum short-term exposure level to an acute REL. RELs are designed to protect sensitive individuals within the population. The calculation of acute non-cancer impacts is similar to the procedure for chronic non-cancer impacts.

An acute or chronic hazard index of 1.0 is considered individually significant. The hazard index is calculated by dividing the acute or chronic exposure by the reference exposure level. The highest maximum chronic and acute hazard index associated with both DPM and acrolein emissions from the Project would be 0.0004 and 0.002, respectively. Therefore, non-carcinogenic hazards are calculated to be within acceptable limits and a less than significant impact would occur.

6.0 CONCLUSION

As described above, impacts related to cancer risk would be less than significant. Additionally, non-carcinogenic hazards are calculated to be within acceptable limits. It should be noted that the impacts assess the Project's incremental contribution to health risk impacts, consistent with the SCAQMD guidance and methodology. Therefore, impacts related to health risk from the Project would be less than significant.

7.0 REFERENCES

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2. California Air Resources Board, *EMFAC 2017 Web Database*, Available at: https://www.arb.ca.gov/emfac/2017/, accessed January 15, 2020.
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4. California Office of Environmental Health Hazard Assessment, *Air Toxics Hot Spots Program Risk Assessment Guidelines*, August 2003.
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6. Herdman Architecture and Design, *Site Plan,* 2019.
7. Lakes Environmental, AERMOD View Gaussian Plume Air Dispersion Model, Version 9.8.3.
8. South Coast Air Quality Management District, *Air Toxics Control Plan for the Next Ten Years*, March 2000.
9. South Coast Air Quality Management District, Addendum to the *Air Toxics Control Plan (March 2000)*, March 2004.
10. South Coast Air Quality Management District, *Multiple Air Toxics Exposure Study (MATES IV)*, May 1, 2015.
11. South Coast Air Quality Management District, *SCAQMD Meteorological Data for AERMOD (Upland),* Available at: http://www.aqmd.gov/home/air-quality/air-quality-data-studies/meteorological-data/aermod-table-1, accessed on January 15, 2020.
12. South Coast Air Quality Management District, *SCAQMD Modeling Guidance for AERMOD*, http://www.aqmd.gov/home/air-quality/meteorological-data/modeling-guidance, accessed January 15, 2020.
13. South Coast Air Quality Management District, *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*, August 2003.
14. Translutions, Inc., *Foothill Boulevard Warehouse Traffic Impact Analysis,* October 2019.
15. U.S. Environmental Protection Agency, *Exposure Factors Handbook: 2011 Edition*, September 2011.

Appendix A

Modeling Data

Truck Route Emissions	Speed (mph)	Trips (veh/day)	Emission Factor (g/mi)	Length (meters)	Length (mi/veh)	Emissions (g/day)	Emission Rate (g/sec)	Total Emission Rate (g/sec)	Directional Rate (g/sec)
Central Avenue	40	50	4.66E-02	2304.1	1.43	3.33E+00	3.86E-05	3.86E-05	1.93E-05
Central Avenue - crossing Foothill Blvd	25	50	5.37E-02	49.1	0.03	8.19E-02	9.48E-07	9.48E-07	4.74E-07
On-Site Movement	15	50	7.97E-02	353.4	0.22	8.75E-01	1.01E-05	1.01E-05	5.06E-06
Idle	0	50	5.66E-02	69.2	0.04	1.22E-01	1.41E-06	1.41E-06	7.04E-07

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** Lakes Environmental Software Inc.
** Date: 1/15/2020
** File: C:\Lakes\AERMOD View\Bridge Upland\Bridge Upland.ADI
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** AERMOD Control Pathway
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CO FINISHED
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** AERMOD Source Pathway
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** Source ID - Type - X Coord. - Y Coord. **
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** DESCRSRC
** PREFIX
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** Vertical Dimension = 4.15
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** Line Source Represented by Adjacent Volume Sources
** LINE VOLUME Source ID = FOTHILLCROSS
** DESCRSRC
** PREFIX
** Length of Side = 3.60
** Configuration = Adjacent
** Emission Rate = 9.48E-07
** Vertical Dimension = 4.15
** SZINIT = 1.93
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** End of LINE VOLUME Source ID = FOTHILLCROSS
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** Line Source Represented by Adjacent Volume Sources
** LINE VOLUME Source ID = ONSITE
** DESCRSRC
** PREFIX
** Length of Side = 3.60
** Configuration = Adjacent
** Emission Rate = 0.0000101
** Vertical Dimension = 4.15
** SZINIT = 1.93
** Nodes = 13
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SRCPARAM L0002081     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002082     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002083     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002084     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002085     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002086     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002087     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002088     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002089     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002090     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002091     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002092     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002093     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002094     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002095     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002096     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002097     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002098     0.00000006031      3.70      1.67      1.93
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SRCPARAM L0002099     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002100     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002101     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002102     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002103     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002104     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002105     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002106     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002107     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002108     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002109     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002110     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002111     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002112     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002113     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002114     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002115     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002116     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002117     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002118     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002119     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002120     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002121     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002122     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002123     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002124     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002125     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002126     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002127     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002128     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002129     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002130     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002131     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002132     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002133     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002134     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002135     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002136     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002137     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002138     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002139     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002140     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002141     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002142     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002143     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002144     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002145     0.00000006031      3.70      1.67      1.93
SRCPARAM L0002146     0.00000006031      3.70      1.67      1.93
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   SRCPARAM L0002147     0.00000006031      3.70      1.67      1.93
   SRCPARAM L0002148     0.00000006031      3.70      1.67      1.93
   SRCPARAM L0002149     0.00000006031      3.70      1.67      1.93
   SRCPARAM L0002150     0.00000006031      3.70      1.67      1.93
   SRCPARAM L0002151     0.00000006031      3.70      1.67      1.93
   SRCPARAM L0002152     0.00000006031      3.70      1.67      1.93
   SRCPARAM L0002153     0.00000006031      3.70      1.67      1.93
   SRCPARAM L0002154     0.00000006031      3.70      1.67      1.93
   SRCPARAM L0002155     0.00000006031      3.70      1.67      1.93
   SRCPARAM L0002156     0.00000006031      3.70      1.67      1.93
   SRCPARAM L0002157     0.00000006031      3.70      1.67      1.93
   SRCPARAM L0002158     0.00000006031      3.70      1.67      1.93
   SRCPARAM L0002159     0.00000006031      3.70      1.67      1.93
   SRCPARAM L0002160     0.00000006031      3.70      1.67      1.93
   SRCPARAM L0002161     0.00000006031      3.70      1.67      1.93
   SRCPARAM L0002162     0.00000006031      3.70      1.67      1.93
   SRCPARAM L0002163     0.00000006031      3.70      1.67      1.93
   SRCPARAM L0002164     0.00000006031      3.70      1.67      1.93
   SRCPARAM L0002165     0.00000006031      3.70      1.67      1.93
   SRCPARAM L0002166     0.00000006031      3.70      1.67      1.93
   SRCPARAM L0002167     0.00000006031      3.70      1.67      1.93
   SRCPARAM L0002168     0.00000006031      3.70      1.67      1.93
   SRCPARAM L0002169     0.00000006031      3.70      1.67      1.93
   SRCPARAM L0002170     0.00000006031      3.70      1.67      1.93
   SRCPARAM L0002171     0.00000006031      3.70      1.67      1.93
   SRCPARAM L0002172     0.00000006031      3.70      1.67      1.93
   SRCPARAM L0002173     0.00000006031      3.70      1.67      1.93
   SRCPARAM L0002174     0.00000006031      3.70      1.67      1.93
   SRCPARAM L0002175     0.00000006031      3.70      1.67      1.93
   SRCPARAM L0002176     0.00000006031      3.70      1.67      1.93
   SRCPARAM L0002177     0.00000006031      3.70      1.67      1.93
   SRCPARAM L0002178     0.00000006031      3.70      1.67      1.93
   SRCPARAM L0002179     0.00000006031      3.70      1.67      1.93
   SRCPARAM L0002180     0.00000006031      3.70      1.67      1.93
   SRCPARAM L0002181     0.00000006031      3.70      1.67      1.93
   SRCPARAM L0002182     0.00000006031      3.70      1.67      1.93
** ------------------------------------------------------------------
** LINE VOLUME Source ID = FOTHILLCROSS
   SRCPARAM L0002281     0.00000006771      3.70      1.67      1.93
   SRCPARAM L0002282     0.00000006771      3.70      1.67      1.93
   SRCPARAM L0002283     0.00000006771      3.70      1.67      1.93
   SRCPARAM L0002284     0.00000006771      3.70      1.67      1.93
   SRCPARAM L0002285     0.00000006771      3.70      1.67      1.93
   SRCPARAM L0002286     0.00000006771      3.70      1.67      1.93
   SRCPARAM L0002287     0.00000006771      3.70      1.67      1.93
   SRCPARAM L0002288     0.00000006771      3.70      1.67      1.93
   SRCPARAM L0002289     0.00000006771      3.70      1.67      1.93
   SRCPARAM L0002290     0.00000006771      3.70      1.67      1.93
```

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   SRCPARAM L0002291     0.00000006771      3.70      1.67      1.93
   SRCPARAM L0002292     0.00000006771      3.70      1.67      1.93
   SRCPARAM L0002293     0.00000006771      3.70      1.67      1.93
   SRCPARAM L0002294     0.00000006771      3.70      1.67      1.93
** ------------------------------------------------------------------
** LINE VOLUME Source ID = ONSITE
   SRCPARAM L0002183     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002184     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002185     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002186     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002187     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002188     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002189     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002190     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002191     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002192     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002193     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002194     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002195     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002196     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002197     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002198     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002199     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002200     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002201     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002202     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002203     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002204     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002205     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002206     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002207     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002208     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002209     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002210     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002211     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002212     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002213     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002214     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002215     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002216     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002217     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002218     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002219     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002220     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002221     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002222     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002223     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002224     0.0000001031      3.70      1.67      1.93
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SRCPARAM L0002225     0.0000001031      3.70      1.67      1.93
SRCPARAM L0002226     0.0000001031      3.70      1.67      1.93
SRCPARAM L0002227     0.0000001031      3.70      1.67      1.93
SRCPARAM L0002228     0.0000001031      3.70      1.67      1.93
SRCPARAM L0002229     0.0000001031      3.70      1.67      1.93
SRCPARAM L0002230     0.0000001031      3.70      1.67      1.93
SRCPARAM L0002231     0.0000001031      3.70      1.67      1.93
SRCPARAM L0002232     0.0000001031      3.70      1.67      1.93
SRCPARAM L0002233     0.0000001031      3.70      1.67      1.93
SRCPARAM L0002234     0.0000001031      3.70      1.67      1.93
SRCPARAM L0002235     0.0000001031      3.70      1.67      1.93
SRCPARAM L0002236     0.0000001031      3.70      1.67      1.93
SRCPARAM L0002237     0.0000001031      3.70      1.67      1.93
SRCPARAM L0002238     0.0000001031      3.70      1.67      1.93
SRCPARAM L0002239     0.0000001031      3.70      1.67      1.93
SRCPARAM L0002240     0.0000001031      3.70      1.67      1.93
SRCPARAM L0002241     0.0000001031      3.70      1.67      1.93
SRCPARAM L0002242     0.0000001031      3.70      1.67      1.93
SRCPARAM L0002243     0.0000001031      3.70      1.67      1.93
SRCPARAM L0002244     0.0000001031      3.70      1.67      1.93
SRCPARAM L0002245     0.0000001031      3.70      1.67      1.93
SRCPARAM L0002246     0.0000001031      3.70      1.67      1.93
SRCPARAM L0002247     0.0000001031      3.70      1.67      1.93
SRCPARAM L0002248     0.0000001031      3.70      1.67      1.93
SRCPARAM L0002249     0.0000001031      3.70      1.67      1.93
SRCPARAM L0002250     0.0000001031      3.70      1.67      1.93
SRCPARAM L0002251     0.0000001031      3.70      1.67      1.93
SRCPARAM L0002252     0.0000001031      3.70      1.67      1.93
SRCPARAM L0002253     0.0000001031      3.70      1.67      1.93
SRCPARAM L0002254     0.0000001031      3.70      1.67      1.93
SRCPARAM L0002255     0.0000001031      3.70      1.67      1.93
SRCPARAM L0002256     0.0000001031      3.70      1.67      1.93
SRCPARAM L0002257     0.0000001031      3.70      1.67      1.93
SRCPARAM L0002258     0.0000001031      3.70      1.67      1.93
SRCPARAM L0002259     0.0000001031      3.70      1.67      1.93
SRCPARAM L0002260     0.0000001031      3.70      1.67      1.93
SRCPARAM L0002261     0.0000001031      3.70      1.67      1.93
SRCPARAM L0002262     0.0000001031      3.70      1.67      1.93
SRCPARAM L0002263     0.0000001031      3.70      1.67      1.93
SRCPARAM L0002264     0.0000001031      3.70      1.67      1.93
SRCPARAM L0002265     0.0000001031      3.70      1.67      1.93
SRCPARAM L0002266     0.0000001031      3.70      1.67      1.93
SRCPARAM L0002267     0.0000001031      3.70      1.67      1.93
SRCPARAM L0002268     0.0000001031      3.70      1.67      1.93
SRCPARAM L0002269     0.0000001031      3.70      1.67      1.93
SRCPARAM L0002270     0.0000001031      3.70      1.67      1.93
SRCPARAM L0002271     0.0000001031      3.70      1.67      1.93
SRCPARAM L0002272     0.0000001031      3.70      1.67      1.93
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   SRCPARAM L0002273     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002274     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002275     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002276     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002277     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002278     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002279     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002280     0.0000001031      3.70      1.67      1.93
** ------------------------------------------------------------------
** LINE VOLUME Source ID = IDLE
   SRCPARAM L0002295     0.00000007421      3.70      1.67      1.93
   SRCPARAM L0002296     0.00000007421      3.70      1.67      1.93
   SRCPARAM L0002297     0.00000007421      3.70      1.67      1.93
   SRCPARAM L0002298     0.00000007421      3.70      1.67      1.93
   SRCPARAM L0002299     0.00000007421      3.70      1.67      1.93
   SRCPARAM L0002300     0.00000007421      3.70      1.67      1.93
   SRCPARAM L0002301     0.00000007421      3.70      1.67      1.93
   SRCPARAM L0002302     0.00000007421      3.70      1.67      1.93
   SRCPARAM L0002303     0.00000007421      3.70      1.67      1.93
   SRCPARAM L0002304     0.00000007421      3.70      1.67      1.93
   SRCPARAM L0002305     0.00000007421      3.70      1.67      1.93
   SRCPARAM L0002306     0.00000007421      3.70      1.67      1.93
   SRCPARAM L0002307     0.00000007421      3.70      1.67      1.93
   SRCPARAM L0002308     0.00000007421      3.70      1.67      1.93
   SRCPARAM L0002309     0.00000007421      3.70      1.67      1.93
   SRCPARAM L0002310     0.00000007421      3.70      1.67      1.93
   SRCPARAM L0002311     0.00000007421      3.70      1.67      1.93
   SRCPARAM L0002312     0.00000007421      3.70      1.67      1.93
   SRCPARAM L0002313     0.00000007421      3.70      1.67      1.93
** ------------------------------------------------------------------
   URBANSRC ALL
   SRCGROUP ALL
SO FINISHED
**
**************************************
** AERMOD Receptor Pathway
**************************************
**
**
RE STARTING
   INCLUDED "Bridge Upland.rou"
RE FINISHED
**
**************************************
** AERMOD Meteorology Pathway
**************************************
**
**
```

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ME STARTING
   SURFFILE UPLA_V9_ADJU\UPLA_v9.SFC
   PROFFILE UPLA_V9_ADJU\UPLA_v9.PFL
   SURFDATA 3102 2012
   UAIRDATA 3190 2012
   SITEDATA 99999 2012
   PROFBASE 379.0 METERS
ME FINISHED
**
**********************************
** AERMOD Output Pathway
**********************************
**
**
OU STARTING
   RECTABLE ALLAVE 1ST
   RECTABLE 1 1ST
   RECTABLE 8 1ST
** Auto-Generated Plotfiles
   PLOTFILE 1 ALL 1ST "Bridge Upland.AD\01H1GALL.PLT" 31
   PLOTFILE 8 ALL 1ST "Bridge Upland.AD\08H1GALL.PLT" 32
   PLOTFILE ANNUAL ALL "Bridge Upland.AD\AN00GALL.PLT" 33
   SUMMFILE "Bridge Upland.sum"
OU FINISHED
**
**********************************
** Project Parameters
**********************************
** PROJCTN  CoordinateSystemUTM
** DESCPTN  UTM: Universal Transverse Mercator
** DATUM    World Geodetic System 1984
** DTMRGN   Global Definition
** UNITS    m
** ZONE     11
** ZONEINX  0
**
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**
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**
** AERMOD Input Produced by:
** AERMOD View Ver. 9.8.3
** Lakes Environmental Software Inc.
** Date: 1/15/2020
** File: C:\Lakes\AERMOD View\Bridge Upland\Bridge Upland.ADI
**
**************************************
**
**
**************************************
** AERMOD Control Pathway
**************************************
**
**
CO STARTING
   TITLEONE C:\Lakes\AERMOD View\Bridge Upland\Bridge Upland.isc
   MODELOPT DFAULT CONC
   AVERTIME 1 8 ANNUAL
   URBANOPT 2035210
   POLLUTID PM_10
   RUNORNOT RUN
   ERRORFIL "Bridge Upland.err"
CO FINISHED
**
**************************************
** AERMOD Source Pathway
**************************************
**
**
SO STARTING
** Source Location **
** Source ID - Type - X Coord. - Y Coord. **
** ------------------------------------------------------------------
** Line Source Represented by Adjacent Volume Sources
** LINE VOLUME Source ID = CENTRAL
** DESCRSRC
** PREFIX
** Length of Side = 3.60
** Configuration = Adjacent
** Emission Rate = 0.0000386
** Vertical Dimension = 4.15
** SZINIT = 1.93
** Nodes = 6
** 436379.468, 3771888.513, 344.56, 3.70, 1.67
** 436380.585, 3772553.496, 360.88, 3.70, 1.67
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** 436385.282, 3773101.754, 376.35, 3.70, 1.67
** 436386.650, 3773423.337, 384.76, 3.70, 1.67
** 436387.568, 3773799.602, 397.25, 3.70, 1.67
** 436386.176, 3774192.635, 411.23, 3.70, 1.67
** ----------------------------------------------------------------
   LOCATION L0001543     VOLUME   436379.471 3771890.313 344.61
   LOCATION L0001544     VOLUME   436379.477 3771893.913 344.70
   LOCATION L0001545     VOLUME   436379.483 3771897.513 344.78
   LOCATION L0001546     VOLUME   436379.489 3771901.113 344.87
   LOCATION L0001547     VOLUME   436379.495 3771904.713 344.97
   LOCATION L0001548     VOLUME   436379.502 3771908.313 345.07
   LOCATION L0001549     VOLUME   436379.508 3771911.913 345.18
   LOCATION L0001550     VOLUME   436379.514 3771915.513 345.29
   LOCATION L0001551     VOLUME   436379.520 3771919.113 345.40
   LOCATION L0001552     VOLUME   436379.526 3771922.713 345.51
   LOCATION L0001553     VOLUME   436379.532 3771926.313 345.61
   LOCATION L0001554     VOLUME   436379.538 3771929.913 345.72
   LOCATION L0001555     VOLUME   436379.544 3771933.513 345.83
   LOCATION L0001556     VOLUME   436379.550 3771937.113 345.93
   LOCATION L0001557     VOLUME   436379.556 3771940.713 346.04
   LOCATION L0001558     VOLUME   436379.562 3771944.313 346.14
   LOCATION L0001559     VOLUME   436379.568 3771947.913 346.24
   LOCATION L0001560     VOLUME   436379.574 3771951.513 346.35
   LOCATION L0001561     VOLUME   436379.580 3771955.113 346.45
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   LOCATION L0002294     VOLUME   436391.341 3774239.833 412.59
** End of LINE VOLUME Source ID = FOTHILLCROSS
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** Line Source Represented by Adjacent Volume Sources
** LINE VOLUME Source ID = ONSITE
** DESCRSRC
** PREFIX
** Length of Side = 3.60
** Configuration = Adjacent
** Emission Rate = 0.0000101
** Vertical Dimension = 4.15
** SZINIT = 1.93
** Nodes = 13
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** 436398.226, 3774247.364, 412.71, 3.70, 1.67
** 436402.688, 3774260.558, 413.93, 3.70, 1.67
** 436403.626, 3774367.944, 417.28, 3.70, 1.67
** 436404.669, 3774404.663, 418.57, 3.70, 1.67
** 436412.251, 3774410.907, 419.30, 3.70, 1.67
** 436429.646, 3774410.907, 420.23, 3.70, 1.67
** 436452.394, 3774410.908, 421.10, 3.70, 1.67
** 436501.719, 3774410.383, 421.02, 3.70, 1.67
** 436542.124, 3774410.908, 421.59, 3.70, 1.67
** 436558.915, 3774411.957, 421.73, 3.70, 1.67
** 436565.212, 3774416.155, 421.89, 3.70, 1.67
** 436565.212, 3774438.194, 422.43, 3.70, 1.67
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   LOCATION L0002184     VOLUME   436395.661 3774244.590 412.74
   LOCATION L0002185     VOLUME   436398.105 3774247.234 412.87
   LOCATION L0002186     VOLUME   436399.322 3774250.606 413.03
   LOCATION L0002187     VOLUME   436400.476 3774254.016 413.19
   LOCATION L0002188     VOLUME   436401.629 3774257.427 413.35
   LOCATION L0002189     VOLUME   436402.691 3774260.852 413.51
   LOCATION L0002190     VOLUME   436402.722 3774264.452 413.67
   LOCATION L0002191     VOLUME   436402.754 3774268.052 413.83
   LOCATION L0002192     VOLUME   436402.785 3774271.652 413.98
   LOCATION L0002193     VOLUME   436402.817 3774275.252 414.14
   LOCATION L0002194     VOLUME   436402.848 3774278.852 414.26
   LOCATION L0002195     VOLUME   436402.879 3774282.452 414.37
   LOCATION L0002196     VOLUME   436402.911 3774286.051 414.49
   LOCATION L0002197     VOLUME   436402.942 3774289.651 414.61
   LOCATION L0002198     VOLUME   436402.974 3774293.251 414.73
   LOCATION L0002199     VOLUME   436403.005 3774296.851 414.85
   LOCATION L0002200     VOLUME   436403.036 3774300.451 414.97
   LOCATION L0002201     VOLUME   436403.068 3774304.051 415.09
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LOCATION L0002202     VOLUME   436403.099 3774307.651 415.20
LOCATION L0002203     VOLUME   436403.131 3774311.250 415.31
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LOCATION L0002205     VOLUME   436403.194 3774318.450 415.53
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LOCATION L0002207     VOLUME   436403.256 3774325.650 415.75
LOCATION L0002208     VOLUME   436403.288 3774329.250 415.86
LOCATION L0002209     VOLUME   436403.319 3774332.850 415.97
LOCATION L0002210     VOLUME   436403.351 3774336.449 416.09
LOCATION L0002211     VOLUME   436403.382 3774340.049 416.24
LOCATION L0002212     VOLUME   436403.413 3774343.649 416.39
LOCATION L0002213     VOLUME   436403.445 3774347.249 416.55
LOCATION L0002214     VOLUME   436403.476 3774350.849 416.70
LOCATION L0002215     VOLUME   436403.508 3774354.449 416.85
LOCATION L0002216     VOLUME   436403.539 3774358.049 417.00
LOCATION L0002217     VOLUME   436403.571 3774361.649 417.16
LOCATION L0002218     VOLUME   436403.602 3774365.248 417.31
LOCATION L0002219     VOLUME   436403.651 3774368.848 417.45
LOCATION L0002220     VOLUME   436403.753 3774372.446 417.57
LOCATION L0002221     VOLUME   436403.856 3774376.045 417.69
LOCATION L0002222     VOLUME   436403.958 3774379.644 417.81
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LOCATION L0002225     VOLUME   436404.265 3774390.439 418.18
LOCATION L0002226     VOLUME   436404.367 3774394.038 418.30
LOCATION L0002227     VOLUME   436404.469 3774397.636 418.42
LOCATION L0002228     VOLUME   436404.572 3774401.235 418.62
LOCATION L0002229     VOLUME   436404.800 3774404.771 418.84
LOCATION L0002230     VOLUME   436407.579 3774407.060 419.07
LOCATION L0002231     VOLUME   436410.358 3774409.349 419.32
LOCATION L0002232     VOLUME   436413.399 3774410.907 419.54
LOCATION L0002233     VOLUME   436416.999 3774410.907 419.68
LOCATION L0002234     VOLUME   436420.599 3774410.907 419.83
LOCATION L0002235     VOLUME   436424.199 3774410.907 419.97
LOCATION L0002236     VOLUME   436427.799 3774410.907 420.10
LOCATION L0002237     VOLUME   436431.399 3774410.908 420.21
LOCATION L0002238     VOLUME   436434.999 3774410.908 420.33
LOCATION L0002239     VOLUME   436438.599 3774410.908 420.45
LOCATION L0002240     VOLUME   436442.199 3774410.908 420.57
LOCATION L0002241     VOLUME   436445.799 3774410.908 420.69
LOCATION L0002242     VOLUME   436449.399 3774410.908 420.81
LOCATION L0002243     VOLUME   436452.999 3774410.901 420.91
LOCATION L0002244     VOLUME   436456.599 3774410.863 421.01
LOCATION L0002245     VOLUME   436460.199 3774410.825 421.10
LOCATION L0002246     VOLUME   436463.798 3774410.787 421.19
LOCATION L0002247     VOLUME   436467.398 3774410.748 421.28
LOCATION L0002248     VOLUME   436470.998 3774410.710 421.37
LOCATION L0002249     VOLUME   436474.598 3774410.672 421.47
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   LOCATION L0002250     VOLUME   436478.198 3774410.633 421.46
   LOCATION L0002251     VOLUME   436481.797 3774410.595 421.39
   LOCATION L0002252     VOLUME   436485.397 3774410.557 421.32
   LOCATION L0002253     VOLUME   436488.997 3774410.518 421.25
   LOCATION L0002254     VOLUME   436492.597 3774410.480 421.18
   LOCATION L0002255     VOLUME   436496.197 3774410.442 421.12
   LOCATION L0002256     VOLUME   436499.796 3774410.404 421.05
   LOCATION L0002257     VOLUME   436503.396 3774410.405 421.06
   LOCATION L0002258     VOLUME   436506.996 3774410.452 421.16
   LOCATION L0002259     VOLUME   436510.595 3774410.498 421.25
   LOCATION L0002260     VOLUME   436514.195 3774410.545 421.34
   LOCATION L0002261     VOLUME   436517.795 3774410.592 421.43
   LOCATION L0002262     VOLUME   436521.395 3774410.639 421.52
   LOCATION L0002263     VOLUME   436524.994 3774410.685 421.60
   LOCATION L0002264     VOLUME   436528.594 3774410.732 421.66
   LOCATION L0002265     VOLUME   436532.194 3774410.779 421.68
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   LOCATION L0002267     VOLUME   436539.393 3774410.872 421.71
   LOCATION L0002268     VOLUME   436542.991 3774410.962 421.73
   LOCATION L0002269     VOLUME   436546.584 3774411.187 421.75
   LOCATION L0002270     VOLUME   436550.177 3774411.411 421.78
   LOCATION L0002271     VOLUME   436553.770 3774411.636 421.80
   LOCATION L0002272     VOLUME   436557.363 3774411.860 421.79
   LOCATION L0002273     VOLUME   436560.617 3774413.091 421.83
   LOCATION L0002274     VOLUME   436563.612 3774415.088 421.89
   LOCATION L0002275     VOLUME   436565.212 3774417.832 421.98
   LOCATION L0002276     VOLUME   436565.212 3774421.432 422.10
   LOCATION L0002277     VOLUME   436565.212 3774425.032 422.23
   LOCATION L0002278     VOLUME   436565.212 3774428.632 422.35
   LOCATION L0002279     VOLUME   436565.212 3774432.232 422.45
   LOCATION L0002280     VOLUME   436565.212 3774435.832 422.56
** End of LINE VOLUME Source ID = ONSITE
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** Line Source Represented by Adjacent Volume Sources
** LINE VOLUME Source ID = IDLE
** DESCRSRC
** PREFIX
** Length of Side = 3.60
** Configuration = Adjacent
** Emission Rate = 1.41E-06
** Vertical Dimension = 4.15
** SZINIT = 1.93
** Nodes = 2
** 436579.146, 3774437.247, 422.42, 3.70, 1.67
** 436578.236, 3774506.392, 424.26, 3.70, 1.67
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   LOCATION L0002296     VOLUME   436579.075 3774442.646 422.82
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   LOCATION L0002298     VOLUME   436578.980 3774449.846 423.04
   LOCATION L0002299     VOLUME   436578.933 3774453.445 423.15
   LOCATION L0002300     VOLUME   436578.886 3774457.045 423.26
   LOCATION L0002301     VOLUME   436578.838 3774460.645 423.32
   LOCATION L0002302     VOLUME   436578.791 3774464.244 423.34
   LOCATION L0002303     VOLUME   436578.744 3774467.844 423.37
   LOCATION L0002304     VOLUME   436578.696 3774471.444 423.39
   LOCATION L0002305     VOLUME   436578.649 3774475.044 423.41
   LOCATION L0002306     VOLUME   436578.601 3774478.643 423.43
   LOCATION L0002307     VOLUME   436578.554 3774482.243 423.46
   LOCATION L0002308     VOLUME   436578.507 3774485.843 423.48
   LOCATION L0002309     VOLUME   436578.459 3774489.442 423.51
   LOCATION L0002310     VOLUME   436578.412 3774493.042 423.64
   LOCATION L0002311     VOLUME   436578.365 3774496.642 423.76
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** Source Parameters **
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SRCPARAM L0002050     0.00000006031      3.70      1.67      1.93
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   SRCPARAM L0002290     0.00000006771      3.70      1.67      1.93
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   SRCPARAM L0002291     0.00000006771      3.70      1.67      1.93
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   SRCPARAM L0002293     0.00000006771      3.70      1.67      1.93
   SRCPARAM L0002294     0.00000006771      3.70      1.67      1.93
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** LINE VOLUME Source ID = ONSITE
   SRCPARAM L0002183     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002184     0.0000001031      3.70      1.67      1.93
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   SRCPARAM L0002188     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002189     0.0000001031      3.70      1.67      1.93
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   SRCPARAM L0002191     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002192     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002193     0.0000001031      3.70      1.67      1.93
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   SRCPARAM L0002199     0.0000001031      3.70      1.67      1.93
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   SRCPARAM L0002212     0.0000001031      3.70      1.67      1.93
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   SRCPARAM L0002273     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002274     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002275     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002276     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002277     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002278     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002279     0.0000001031      3.70      1.67      1.93
   SRCPARAM L0002280     0.0000001031      3.70      1.67      1.93
** ------------------------------------------------------------------
** LINE VOLUME Source ID = IDLE
   SRCPARAM L0002295     0.00000007421      3.70      1.67      1.93
   SRCPARAM L0002296     0.00000007421      3.70      1.67      1.93
   SRCPARAM L0002297     0.00000007421      3.70      1.67      1.93
   SRCPARAM L0002298     0.00000007421      3.70      1.67      1.93
   SRCPARAM L0002299     0.00000007421      3.70      1.67      1.93
   SRCPARAM L0002300     0.00000007421      3.70      1.67      1.93
   SRCPARAM L0002301     0.00000007421      3.70      1.67      1.93
   SRCPARAM L0002302     0.00000007421      3.70      1.67      1.93
   SRCPARAM L0002303     0.00000007421      3.70      1.67      1.93
   SRCPARAM L0002304     0.00000007421      3.70      1.67      1.93
   SRCPARAM L0002305     0.00000007421      3.70      1.67      1.93
   SRCPARAM L0002306     0.00000007421      3.70      1.67      1.93
   SRCPARAM L0002307     0.00000007421      3.70      1.67      1.93
   SRCPARAM L0002308     0.00000007421      3.70      1.67      1.93
   SRCPARAM L0002309     0.00000007421      3.70      1.67      1.93
   SRCPARAM L0002310     0.00000007421      3.70      1.67      1.93
   SRCPARAM L0002311     0.00000007421      3.70      1.67      1.93
   SRCPARAM L0002312     0.00000007421      3.70      1.67      1.93
   SRCPARAM L0002313     0.00000007421      3.70      1.67      1.93
** ------------------------------------------------------------------
   URBANSRC ALL
   SRCGROUP ALL
SO FINISHED
**
**************************************
** AERMOD Receptor Pathway
**************************************
**
**
RE STARTING
   INCLUDED "Bridge Upland.rou"
RE FINISHED
**
**************************************
** AERMOD Meteorology Pathway
**************************************
**
**
```

```
ME STARTING
   SURFFILE UPLA_V9_ADJU\UPLA_v9.SFC
   PROFFILE UPLA_V9_ADJU\UPLA_v9.PFL
   SURFDATA 3102 2012
   UAIRDATA 3190 2012
   SITEDATA 99999 2012
   PROFBASE 379.0 METERS
ME FINISHED
**
**************************************
** AERMOD Output Pathway
**************************************
**
**
OU STARTING
   RECTABLE ALLAVE 1ST
   RECTABLE 1 1ST
   RECTABLE 8 1ST
** Auto-Generated Plotfiles
   PLOTFILE 1 ALL 1ST "Bridge Upland.AD\01H1GALL.PLT" 31
   PLOTFILE 8 ALL 1ST "Bridge Upland.AD\08H1GALL.PLT" 32
   PLOTFILE ANNUAL ALL "Bridge Upland.AD\AN00GALL.PLT" 33
   SUMMFILE "Bridge Upland.sum"
OU FINISHED


  *** Message Summary For AERMOD Model Setup ***

  --------- Summary of Total Messages --------

 A Total of            0 Fatal Error Message(s)
 A Total of            2 Warning Message(s)
 A Total of            0 Informational Message(s)


    ******** FATAL ERROR MESSAGES ********
               ***  NONE  ***


    ********   WARNING MESSAGES   ********
 ME W186    1688       MEOPEN: THRESH_1MIN 1-min ASOS wind speed threshold used
      0.50
 ME W187    1688       MEOPEN: ADJ_U* Option for Stable Low Winds used in AERMET


 ***********************************
 *** SETUP Finishes Successfully ***
 ***********************************
```

```
 *** AERMOD - VERSION  19191 ***   *** C:\Lakes\AERMOD View\Bridge Upland\Bridge
Upland.isc                  ***        01/15/20
 *** AERMET - VERSION  16216 ***   ***
                          ***        13:48:55

                                    PAGE   1
 *** MODELOPTs:    RegDFAULT  CONC  ELEV  URBAN  ADJ_U*

                                             ***     MODEL SETUP OPTIONS SUMMARY
  ***
 - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
- - - - - - - - - - - - - - - - - - - - - - -

 **Model Is Setup For Calculation of Average CONCentration Values.

   --  DEPOSITION LOGIC  --
 **NO GAS DEPOSITION Data Provided.
 **NO PARTICLE DEPOSITION Data Provided.
 **Model Uses NO DRY DEPLETION.  DRYDPLT  =  F
 **Model Uses NO WET DEPLETION.  WETDPLT  =  F

 **Model Uses URBAN Dispersion Algorithm for the SBL for   771 Source(s),
   for Total of    1 Urban Area(s):
   Urban Population =   2035210.0 ;  Urban Roughness Length =  1.000 m

 **Model Uses Regulatory DEFAULT Options:
         1. Stack-tip Downwash.
         2. Model Accounts for ELEVated Terrain Effects.
         3. Use Calms Processing Routine.
         4. Use Missing Data Processing Routine.
         5. No Exponential Decay.
         6. Urban Roughness Length of 1.0 Meter Assumed.

 **Other Options Specified:
         ADJ_U*   - Use ADJ_U* option for SBL in AERMET
         TEMP_Sub - Meteorological data includes TEMP substitutions

 **Model Assumes No FLAGPOLE Receptor Heights.

 **The User Specified a Pollutant Type of:  PM_10

 **Model Calculates  2 Short Term Average(s) of:   1-HR   8-HR
     and Calculates ANNUAL Averages

 **This Run Includes:    771 Source(s);       1 Source Group(s); and    1708
Receptor(s)
```

Bridge Upland.ADO
with: 0 POINT(s), including
0 POINTCAP(s) and 0 POINTHOR(s)
and: 771 VOLUME source(s)
and: 0 AREA type source(s)
and: 0 LINE source(s)
and: 0 RLINE/RLINEXT source(s)
and: 0 OPENPIT source(s)
and: 0 BUOYANT LINE source(s) with 0 line(s)

**Model Set To Continue RUNning After the Setup Testing.

**The AERMET Input Meteorological Data Version Date: 16216

**Output Options Selected:
Model Outputs Tables of ANNUAL Averages by Receptor
Model Outputs Tables of Highest Short Term Values by Receptor (RECTABLE Keyword)
Model Outputs External File(s) of High Values for Plotting (PLOTFILE Keyword)
Model Outputs Separate Summary File of High Ranked Values (SUMMFILE Keyword)

**NOTE: The Following Flags May Appear Following CONC Values: c for Calm Hours
m for Missing Hours
b for Both Calm and Missing Hours

**Misc. Inputs: Base Elev. for Pot. Temp. Profile (m MSL) = 379.00 ; Decay Coef. = 0.000 ; Rot. Angle = 0.0
Emission Units = GRAMS/SEC ;
Emission Rate Unit Factor = 0.10000E+07
Output Units = MICROGRAMS/M**3

**Approximate Storage Requirements of Model = 4.1 MB of RAM.

**Input Runstream File: aermod.inp

**Output Print File: aermod.out

**Detailed Error/Message File: Bridge Upland.err

**File for Summary of Results: Bridge Upland.sum

*** VOLUME SOURCE DATA ***

SOURCE ID	NUMBER EMISSION RATE PART. SCALAR CATS.	EMISSION RATE (GRAMS/SEC) VARY BY	X (METERS)	Y (METERS)	BASE ELEV. (METERS)	RELEASE HEIGHT (METERS)	INIT. SY (METERS)	INIT. SZ (METERS)	URBAN SOURCE
L0001543	0	0.60310E-07	436379.5	3771890.3	344.6	3.70	1.67	1.93	YES
L0001544	0	0.60310E-07	436379.5	3771893.9	344.7	3.70	1.67	1.93	YES
L0001545	0	0.60310E-07	436379.5	3771897.5	344.8	3.70	1.67	1.93	YES
L0001546	0	0.60310E-07	436379.5	3771901.1	344.9	3.70	1.67	1.93	YES
L0001547	0	0.60310E-07	436379.5	3771904.7	345.0	3.70	1.67	1.93	YES
L0001548	0	0.60310E-07	436379.5	3771908.3	345.1	3.70	1.67	1.93	YES
L0001549	0	0.60310E-07	436379.5	3771911.9	345.2	3.70	1.67	1.93	YES
L0001550	0	0.60310E-07	436379.5	3771915.5	345.3	3.70	1.67	1.93	YES
L0001551	0	0.60310E-07	436379.5	3771919.1	345.4	3.70	1.67	1.93	YES
L0001552	0	0.60310E-07	436379.5	3771922.7	345.5	3.70	1.67	1.93	YES
L0001553	0	0.60310E-07	436379.5	3771926.3	345.6	3.70	1.67	1.93	YES
L0001554	0	0.60310E-07	436379.5	3771929.9	345.7	3.70	1.67	1.93	YES
L0001555	0	0.60310E-07	436379.5	3771933.5	345.8	3.70	1.67	1.93	YES
L0001556	0	0.60310E-07	436379.5	3771937.1	345.9	3.70	1.67	1.93	YES
L0001557	0	0.60310E-07	436379.6	3771940.7	346.0	3.70	1.67	1.93	YES

L0001558	0	0.60310E-07	436379.6	3771944.3	346.1	3.70	1.67	1.93 YES
L0001559	0	0.60310E-07	436379.6	3771947.9	346.2	3.70	1.67	1.93 YES
L0001560	0	0.60310E-07	436379.6	3771951.5	346.4	3.70	1.67	1.93 YES
L0001561	0	0.60310E-07	436379.6	3771955.1	346.4	3.70	1.67	1.93 YES
L0001562	0	0.60310E-07	436379.6	3771958.7	346.6	3.70	1.67	1.93 YES
L0001563	0	0.60310E-07	436379.6	3771962.3	346.7	3.70	1.67	1.93 YES
L0001564	0	0.60310E-07	436379.6	3771965.9	346.8	3.70	1.67	1.93 YES
L0001565	0	0.60310E-07	436379.6	3771969.5	346.8	3.70	1.67	1.93 YES
L0001566	0	0.60310E-07	436379.6	3771973.1	346.9	3.70	1.67	1.93 YES
L0001567	0	0.60310E-07	436379.6	3771976.7	347.0	3.70	1.67	1.93 YES
L0001568	0	0.60310E-07	436379.6	3771980.3	347.1	3.70	1.67	1.93 YES
L0001569	0	0.60310E-07	436379.6	3771983.9	347.2	3.70	1.67	1.93 YES
L0001570	0	0.60310E-07	436379.6	3771987.5	347.2	3.70	1.67	1.93 YES
L0001571	0	0.60310E-07	436379.6	3771991.1	347.3	3.70	1.67	1.93 YES
L0001572	0	0.60310E-07	436379.6	3771994.7	347.4	3.70	1.67	1.93 YES
L0001573	0	0.60310E-07	436379.7	3771998.3	347.5	3.70	1.67	1.93 YES
L0001574	0	0.60310E-07	436379.7	3772001.9	347.6	3.70	1.67	1.93 YES
L0001575	0	0.60310E-07	436379.7	3772005.5	347.6	3.70	1.67	1.93 YES
L0001576	0	0.60310E-07	436379.7	3772009.1	347.7	3.70	1.67	1.93 YES
L0001577	0	0.60310E-07	436379.7	3772012.7	347.8	3.70	1.67	1.93 YES
L0001578	0	0.60310E-07	436379.7	3772016.3	347.9	3.70	1.67	1.93 YES
L0001579	0	0.60310E-07	436379.7	3772019.9	347.9	3.70	1.67	1.93 YES
L0001580	0	0.60310E-07	436379.7	3772023.5	348.0	3.70	1.67	1.93 YES
L0001581	0	0.60310E-07	436379.7	3772027.1	348.1	3.70	1.67	1.93 YES

 L0001582   0   0.60310E-07 436379.7 3772030.7   348.2   3.70   1.67
1.93   YES

 *** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

                                                    *** VOLUME SOURCE DATA ***

               NUMBER EMISSION RATE   BASE   RELEASE   INIT.
INIT.   URBAN EMISSION RATE
   SOURCE   PART. (GRAMS/SEC)   X   Y   ELEV.   HEIGHT   SY
SZ   SOURCE SCALAR VARY
     ID   CATS.   (METERS) (METERS) (METERS) (METERS) (METERS)
(METERS)   BY
 -
- -

 L0001583   0   0.60310E-07 436379.7 3772034.3   348.2   3.70   1.67
1.93   YES
 L0001584   0   0.60310E-07 436379.7 3772037.9   348.3   3.70   1.67
1.93   YES
 L0001585   0   0.60310E-07 436379.7 3772041.5   348.4   3.70   1.67
1.93   YES
 L0001586   0   0.60310E-07 436379.7 3772045.1   348.4   3.70   1.67
1.93   YES
 L0001587   0   0.60310E-07 436379.7 3772048.7   348.5   3.70   1.67
1.93   YES
 L0001588   0   0.60310E-07 436379.7 3772052.3   348.6   3.70   1.67
1.93   YES
 L0001589   0   0.60310E-07 436379.7 3772055.9   348.7   3.70   1.67
1.93   YES
 L0001590   0   0.60310E-07 436379.8 3772059.5   348.7   3.70   1.67
1.93   YES
 L0001591   0   0.60310E-07 436379.8 3772063.1   348.8   3.70   1.67
1.93   YES
 L0001592   0   0.60310E-07 436379.8 3772066.7   348.9   3.70   1.67
1.93   YES
 L0001593   0   0.60310E-07 436379.8 3772070.3   348.9   3.70   1.67
1.93   YES
 L0001594   0   0.60310E-07 436379.8 3772073.9   349.0   3.70   1.67
1.93   YES
 L0001595   0   0.60310E-07 436379.8 3772077.5   349.1   3.70   1.67
1.93   YES

L0001596	0	0.60310E-07	436379.8	3772081.1	349.2	3.70	1.67	1.93 YES
L0001597	0	0.60310E-07	436379.8	3772084.7	349.2	3.70	1.67	1.93 YES
L0001598	0	0.60310E-07	436379.8	3772088.3	349.3	3.70	1.67	1.93 YES
L0001599	0	0.60310E-07	436379.8	3772091.9	349.4	3.70	1.67	1.93 YES
L0001600	0	0.60310E-07	436379.8	3772095.5	349.4	3.70	1.67	1.93 YES
L0001601	0	0.60310E-07	436379.8	3772099.1	349.5	3.70	1.67	1.93 YES
L0001602	0	0.60310E-07	436379.8	3772102.7	349.6	3.70	1.67	1.93 YES
L0001603	0	0.60310E-07	436379.8	3772106.3	349.7	3.70	1.67	1.93 YES
L0001604	0	0.60310E-07	436379.8	3772109.9	349.8	3.70	1.67	1.93 YES
L0001605	0	0.60310E-07	436379.8	3772113.5	349.9	3.70	1.67	1.93 YES
L0001606	0	0.60310E-07	436379.9	3772117.1	349.9	3.70	1.67	1.93 YES
L0001607	0	0.60310E-07	436379.9	3772120.7	350.0	3.70	1.67	1.93 YES
L0001608	0	0.60310E-07	436379.9	3772124.3	350.1	3.70	1.67	1.93 YES
L0001609	0	0.60310E-07	436379.9	3772127.9	350.2	3.70	1.67	1.93 YES
L0001610	0	0.60310E-07	436379.9	3772131.5	350.3	3.70	1.67	1.93 YES
L0001611	0	0.60310E-07	436379.9	3772135.1	350.3	3.70	1.67	1.93 YES
L0001612	0	0.60310E-07	436379.9	3772138.7	350.4	3.70	1.67	1.93 YES
L0001613	0	0.60310E-07	436379.9	3772142.3	350.5	3.70	1.67	1.93 YES
L0001614	0	0.60310E-07	436379.9	3772145.9	350.6	3.70	1.67	1.93 YES
L0001615	0	0.60310E-07	436379.9	3772149.5	350.7	3.70	1.67	1.93 YES
L0001616	0	0.60310E-07	436379.9	3772153.1	350.7	3.70	1.67	1.93 YES
L0001617	0	0.60310E-07	436379.9	3772156.7	350.8	3.70	1.67	1.93 YES
L0001618	0	0.60310E-07	436379.9	3772160.3	350.9	3.70	1.67	1.93 YES
L0001619	0	0.60310E-07	436379.9	3772163.9	351.0	3.70	1.67	1.93 YES

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 L0001620         0   0.60310E-07  436379.9 3772167.5   351.0     3.70     1.67
1.93     YES
 L0001621         0   0.60310E-07  436379.9 3772171.1   351.1     3.70     1.67
1.93     YES
 L0001622         0   0.60310E-07  436379.9 3772174.7   351.2     3.70     1.67
1.93     YES
```



```
                                                    *** VOLUME SOURCE DATA ***

               NUMBER EMISSION RATE                    BASE    RELEASE    INIT.
INIT.   URBAN  EMISSION RATE
   SOURCE       PART.  (GRAMS/SEC)     X        Y      ELEV.   HEIGHT      SY
SZ     SOURCE  SCALAR VARY
     ID         CATS.               (METERS) (METERS) (METERS) (METERS) (METERS)
(METERS)             BY
 - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
- - - - - - - - - - - - - - - - - - - - - - -

 L0001623         0   0.60310E-07  436380.0 3772178.3   351.2     3.70     1.67
1.93     YES
 L0001624         0   0.60310E-07  436380.0 3772181.9   351.3     3.70     1.67
1.93     YES
 L0001625         0   0.60310E-07  436380.0 3772185.5   351.4     3.70     1.67
1.93     YES
 L0001626         0   0.60310E-07  436380.0 3772189.1   351.5     3.70     1.67
1.93     YES
 L0001627         0   0.60310E-07  436380.0 3772192.7   351.6     3.70     1.67
1.93     YES
 L0001628         0   0.60310E-07  436380.0 3772196.3   351.6     3.70     1.67
1.93     YES
 L0001629         0   0.60310E-07  436380.0 3772199.9   351.7     3.70     1.67
1.93     YES
 L0001630         0   0.60310E-07  436380.0 3772203.5   351.8     3.70     1.67
1.93     YES
 L0001631         0   0.60310E-07  436380.0 3772207.1   351.9     3.70     1.67
1.93     YES
 L0001632         0   0.60310E-07  436380.0 3772210.7   351.9     3.70     1.67
1.93     YES
 L0001633         0   0.60310E-07  436380.0 3772214.3   352.0     3.70     1.67
1.93     YES
```

L0001634	0	0.60310E-07	436380.0	3772217.9	352.1	3.70	1.67	1.93 YES
L0001635	0	0.60310E-07	436380.0	3772221.5	352.2	3.70	1.67	1.93 YES
L0001636	0	0.60310E-07	436380.0	3772225.1	352.2	3.70	1.67	1.93 YES
L0001637	0	0.60310E-07	436380.0	3772228.7	352.3	3.70	1.67	1.93 YES
L0001638	0	0.60310E-07	436380.0	3772232.3	352.4	3.70	1.67	1.93 YES
L0001639	0	0.60310E-07	436380.1	3772235.9	352.5	3.70	1.67	1.93 YES
L0001640	0	0.60310E-07	436380.1	3772239.5	352.5	3.70	1.67	1.93 YES
L0001641	0	0.60310E-07	436380.1	3772243.1	352.6	3.70	1.67	1.93 YES
L0001642	0	0.60310E-07	436380.1	3772246.7	352.7	3.70	1.67	1.93 YES
L0001643	0	0.60310E-07	436380.1	3772250.3	352.8	3.70	1.67	1.93 YES
L0001644	0	0.60310E-07	436380.1	3772253.9	352.9	3.70	1.67	1.93 YES
L0001645	0	0.60310E-07	436380.1	3772257.5	352.9	3.70	1.67	1.93 YES
L0001646	0	0.60310E-07	436380.1	3772261.1	353.0	3.70	1.67	1.93 YES
L0001647	0	0.60310E-07	436380.1	3772264.7	353.1	3.70	1.67	1.93 YES
L0001648	0	0.60310E-07	436380.1	3772268.3	353.2	3.70	1.67	1.93 YES
L0001649	0	0.60310E-07	436380.1	3772271.9	353.2	3.70	1.67	1.93 YES
L0001650	0	0.60310E-07	436380.1	3772275.5	353.4	3.70	1.67	1.93 YES
L0001651	0	0.60310E-07	436380.1	3772279.1	353.4	3.70	1.67	1.93 YES
L0001652	0	0.60310E-07	436380.1	3772282.7	353.5	3.70	1.67	1.93 YES
L0001653	0	0.60310E-07	436380.1	3772286.3	353.6	3.70	1.67	1.93 YES
L0001654	0	0.60310E-07	436380.1	3772289.9	353.7	3.70	1.67	1.93 YES
L0001655	0	0.60310E-07	436380.1	3772293.5	353.8	3.70	1.67	1.93 YES
L0001656	0	0.60310E-07	436380.2	3772297.1	353.9	3.70	1.67	1.93 YES
L0001657	0	0.60310E-07	436380.2	3772300.7	354.0	3.70	1.67	1.93 YES

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 L0001658         0   0.60310E-07  436380.2 3772304.3   354.1     3.70     1.67
1.93     YES
 L0001659         0   0.60310E-07  436380.2 3772307.9   354.2     3.70     1.67
1.93     YES
 L0001660         0   0.60310E-07  436380.2 3772311.5   354.3     3.70     1.67
1.93     YES
 L0001661         0   0.60310E-07  436380.2 3772315.1   354.4     3.70     1.67
1.93     YES
 L0001662         0   0.60310E-07  436380.2 3772318.7   354.5     3.70     1.67
1.93     YES
```



```
                                                    *** VOLUME SOURCE DATA ***

              NUMBER EMISSION RATE                    BASE    RELEASE    INIT.
INIT.   URBAN  EMISSION RATE
   SOURCE       PART.  (GRAMS/SEC)     X        Y      ELEV.   HEIGHT      SY
SZ     SOURCE  SCALAR VARY
     ID         CATS.               (METERS) (METERS) (METERS) (METERS) (METERS)
(METERS)             BY
 - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
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 L0001663         0   0.60310E-07  436380.2 3772322.3   354.6     3.70     1.67
1.93     YES
 L0001664         0   0.60310E-07  436380.2 3772325.9   354.7     3.70     1.67
1.93     YES
 L0001665         0   0.60310E-07  436380.2 3772329.5   354.8     3.70     1.67
1.93     YES
 L0001666         0   0.60310E-07  436380.2 3772333.1   354.8     3.70     1.67
1.93     YES
 L0001667         0   0.60310E-07  436380.2 3772336.7   354.9     3.70     1.67
1.93     YES
 L0001668         0   0.60310E-07  436380.2 3772340.3   355.0     3.70     1.67
1.93     YES
 L0001669         0   0.60310E-07  436380.2 3772343.9   355.1     3.70     1.67
1.93     YES
 L0001670         0   0.60310E-07  436380.2 3772347.5   355.2     3.70     1.67
1.93     YES
 L0001671         0   0.60310E-07  436380.2 3772351.1   355.3     3.70     1.67
1.93     YES
```

L0001672	0	0.60310E-07	436380.3	3772354.7	355.4	3.70	1.67	1.93 YES
L0001673	0	0.60310E-07	436380.3	3772358.3	355.4	3.70	1.67	1.93 YES
L0001674	0	0.60310E-07	436380.3	3772361.9	355.5	3.70	1.67	1.93 YES
L0001675	0	0.60310E-07	436380.3	3772365.5	355.6	3.70	1.67	1.93 YES
L0001676	0	0.60310E-07	436380.3	3772369.1	355.7	3.70	1.67	1.93 YES
L0001677	0	0.60310E-07	436380.3	3772372.7	355.8	3.70	1.67	1.93 YES
L0001678	0	0.60310E-07	436380.3	3772376.3	355.9	3.70	1.67	1.93 YES
L0001679	0	0.60310E-07	436380.3	3772379.9	356.0	3.70	1.67	1.93 YES
L0001680	0	0.60310E-07	436380.3	3772383.5	356.1	3.70	1.67	1.93 YES
L0001681	0	0.60310E-07	436380.3	3772387.1	356.2	3.70	1.67	1.93 YES
L0001682	0	0.60310E-07	436380.3	3772390.7	356.3	3.70	1.67	1.93 YES
L0001683	0	0.60310E-07	436380.3	3772394.3	356.4	3.70	1.67	1.93 YES
L0001684	0	0.60310E-07	436380.3	3772397.9	356.4	3.70	1.67	1.93 YES
L0001685	0	0.60310E-07	436380.3	3772401.5	356.6	3.70	1.67	1.93 YES
L0001686	0	0.60310E-07	436380.3	3772405.1	356.7	3.70	1.67	1.93 YES
L0001687	0	0.60310E-07	436380.3	3772408.7	356.8	3.70	1.67	1.93 YES
L0001688	0	0.60310E-07	436380.3	3772412.3	356.9	3.70	1.67	1.93 YES
L0001689	0	0.60310E-07	436380.4	3772415.9	356.9	3.70	1.67	1.93 YES
L0001690	0	0.60310E-07	436380.4	3772419.5	357.1	3.70	1.67	1.93 YES
L0001691	0	0.60310E-07	436380.4	3772423.1	357.2	3.70	1.67	1.93 YES
L0001692	0	0.60310E-07	436380.4	3772426.7	357.2	3.70	1.67	1.93 YES
L0001693	0	0.60310E-07	436380.4	3772430.3	357.4	3.70	1.67	1.93 YES
L0001694	0	0.60310E-07	436380.4	3772433.9	357.5	3.70	1.67	1.93 YES
L0001695	0	0.60310E-07	436380.4	3772437.5	357.6	3.70	1.67	1.93 YES

```
 L0001696         0   0.60310E-07  436380.4 3772441.1   357.7     3.70     1.67
1.93     YES
 L0001697         0   0.60310E-07  436380.4 3772444.7   357.8     3.70     1.67
1.93     YES
 L0001698         0   0.60310E-07  436380.4 3772448.3   357.9     3.70     1.67
1.93     YES
 L0001699         0   0.60310E-07  436380.4 3772451.9   358.1     3.70     1.67
1.93     YES
 L0001700         0   0.60310E-07  436380.4 3772455.5   358.2     3.70     1.67
1.93     YES
 L0001701         0   0.60310E-07  436380.4 3772459.1   358.3     3.70     1.67
1.93     YES
 L0001702         0   0.60310E-07  436380.4 3772462.7   358.4     3.70     1.67
1.93     YES
```



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                                                    *** VOLUME SOURCE DATA ***

               NUMBER EMISSION RATE                    BASE    RELEASE    INIT.
INIT.   URBAN  EMISSION RATE
   SOURCE       PART.  (GRAMS/SEC)     X        Y      ELEV.   HEIGHT      SY
SZ     SOURCE  SCALAR VARY
     ID         CATS.               (METERS) (METERS) (METERS) (METERS) (METERS)
(METERS)             BY
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 L0001703         0   0.60310E-07  436380.4 3772466.3   358.5     3.70     1.67
1.93     YES
 L0001704         0   0.60310E-07  436380.4 3772469.9   358.6     3.70     1.67
1.93     YES
 L0001705         0   0.60310E-07  436380.5 3772473.5   358.7     3.70     1.67
1.93     YES
 L0001706         0   0.60310E-07  436380.5 3772477.1   358.8     3.70     1.67
1.93     YES
 L0001707         0   0.60310E-07  436380.5 3772480.7   358.9     3.70     1.67
1.93     YES
 L0001708         0   0.60310E-07  436380.5 3772484.3   358.9     3.70     1.67
1.93     YES
 L0001709         0   0.60310E-07  436380.5 3772487.9   359.1     3.70     1.67
1.93     YES
```

L0001710	0	0.60310E-07	436380.5	3772491.5	359.2	3.70	1.67	1.93 YES
L0001711	0	0.60310E-07	436380.5	3772495.1	359.2	3.70	1.67	1.93 YES
L0001712	0	0.60310E-07	436380.5	3772498.7	359.4	3.70	1.67	1.93 YES
L0001713	0	0.60310E-07	436380.5	3772502.3	359.5	3.70	1.67	1.93 YES
L0001714	0	0.60310E-07	436380.5	3772505.9	359.6	3.70	1.67	1.93 YES
L0001715	0	0.60310E-07	436380.5	3772509.5	359.7	3.70	1.67	1.93 YES
L0001716	0	0.60310E-07	436380.5	3772513.1	359.8	3.70	1.67	1.93 YES
L0001717	0	0.60310E-07	436380.5	3772516.7	359.9	3.70	1.67	1.93 YES
L0001718	0	0.60310E-07	436380.5	3772520.3	360.0	3.70	1.67	1.93 YES
L0001719	0	0.60310E-07	436380.5	3772523.9	360.1	3.70	1.67	1.93 YES
L0001720	0	0.60310E-07	436380.5	3772527.5	360.2	3.70	1.67	1.93 YES
L0001721	0	0.60310E-07	436380.5	3772531.1	360.3	3.70	1.67	1.93 YES
L0001722	0	0.60310E-07	436380.6	3772534.7	360.4	3.70	1.67	1.93 YES
L0001723	0	0.60310E-07	436380.6	3772538.3	360.5	3.70	1.67	1.93 YES
L0001724	0	0.60310E-07	436380.6	3772541.9	360.6	3.70	1.67	1.93 YES
L0001725	0	0.60310E-07	436380.6	3772545.5	360.7	3.70	1.67	1.93 YES
L0001726	0	0.60310E-07	436380.6	3772549.1	360.8	3.70	1.67	1.93 YES
L0001727	0	0.60310E-07	436380.6	3772552.7	360.9	3.70	1.67	1.93 YES
L0001728	0	0.60310E-07	436380.6	3772556.3	361.0	3.70	1.67	1.93 YES
L0001729	0	0.60310E-07	436380.6	3772559.9	361.1	3.70	1.67	1.93 YES
L0001730	0	0.60310E-07	436380.7	3772563.5	361.2	3.70	1.67	1.93 YES
L0001731	0	0.60310E-07	436380.7	3772567.1	361.3	3.70	1.67	1.93 YES
L0001732	0	0.60310E-07	436380.7	3772570.7	361.4	3.70	1.67	1.93 YES
L0001733	0	0.60310E-07	436380.8	3772574.3	361.5	3.70	1.67	1.93 YES

```
 L0001734         0   0.60310E-07  436380.8 3772577.9   361.6     3.70     1.67
1.93     YES
 L0001735         0   0.60310E-07  436380.8 3772581.5   361.7     3.70     1.67
1.93     YES
 L0001736         0   0.60310E-07  436380.9 3772585.1   361.8     3.70     1.67
1.93     YES
 L0001737         0   0.60310E-07  436380.9 3772588.7   361.9     3.70     1.67
1.93     YES
 L0001738         0   0.60310E-07  436380.9 3772592.3   362.0     3.70     1.67
1.93     YES
 L0001739         0   0.60310E-07  436380.9 3772595.9   362.1     3.70     1.67
1.93     YES
 L0001740         0   0.60310E-07  436381.0 3772599.5   362.2     3.70     1.67
1.93     YES
 L0001741         0   0.60310E-07  436381.0 3772603.1   362.3     3.70     1.67
1.93     YES
 L0001742         0   0.60310E-07  436381.0 3772606.7   362.4     3.70     1.67
1.93     YES
 *** AERMOD - VERSION  19191 ***   *** C:\Lakes\AERMOD View\Bridge Upland\Bridge
Upland.isc                 ***       01/15/20
 *** AERMET - VERSION  16216 ***   ***
                       ***         13:48:55

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 *** MODELOPTs:    RegDFAULT  CONC  ELEV  URBAN  ADJ_U*


                                                    *** VOLUME SOURCE DATA ***

               NUMBER EMISSION RATE                    BASE    RELEASE    INIT.
INIT.   URBAN  EMISSION RATE
   SOURCE       PART.  (GRAMS/SEC)     X        Y      ELEV.   HEIGHT      SY
SZ     SOURCE  SCALAR VARY
     ID         CATS.               (METERS) (METERS) (METERS) (METERS) (METERS)
(METERS)             BY
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 L0001743         0   0.60310E-07  436381.1 3772610.3   362.4     3.70     1.67
1.93     YES
 L0001744         0   0.60310E-07  436381.1 3772613.9   362.6     3.70     1.67
1.93     YES
 L0001745         0   0.60310E-07  436381.1 3772617.5   362.7     3.70     1.67
1.93     YES
 L0001746         0   0.60310E-07  436381.2 3772621.1   362.8     3.70     1.67
1.93     YES
 L0001747         0   0.60310E-07  436381.2 3772624.7   362.9     3.70     1.67
1.93     YES
```

L0001748	0	0.60310E-07	436381.2	3772628.3	363.1	3.70	1.67	1.93 YES
L0001749	0	0.60310E-07	436381.3	3772631.9	363.2	3.70	1.67	1.93 YES
L0001750	0	0.60310E-07	436381.3	3772635.5	363.3	3.70	1.67	1.93 YES
L0001751	0	0.60310E-07	436381.3	3772639.1	363.4	3.70	1.67	1.93 YES
L0001752	0	0.60310E-07	436381.3	3772642.7	363.6	3.70	1.67	1.93 YES
L0001753	0	0.60310E-07	436381.4	3772646.3	363.7	3.70	1.67	1.93 YES
L0001754	0	0.60310E-07	436381.4	3772649.9	363.8	3.70	1.67	1.93 YES
L0001755	0	0.60310E-07	436381.4	3772653.5	363.9	3.70	1.67	1.93 YES
L0001756	0	0.60310E-07	436381.5	3772657.1	364.0	3.70	1.67	1.93 YES
L0001757	0	0.60310E-07	436381.5	3772660.7	364.2	3.70	1.67	1.93 YES
L0001758	0	0.60310E-07	436381.5	3772664.3	364.3	3.70	1.67	1.93 YES
L0001759	0	0.60310E-07	436381.6	3772667.9	364.4	3.70	1.67	1.93 YES
L0001760	0	0.60310E-07	436381.6	3772671.5	364.5	3.70	1.67	1.93 YES
L0001761	0	0.60310E-07	436381.6	3772675.1	364.6	3.70	1.67	1.93 YES
L0001762	0	0.60310E-07	436381.7	3772678.7	364.8	3.70	1.67	1.93 YES
L0001763	0	0.60310E-07	436381.7	3772682.3	364.9	3.70	1.67	1.93 YES
L0001764	0	0.60310E-07	436381.7	3772685.9	365.0	3.70	1.67	1.93 YES
L0001765	0	0.60310E-07	436381.8	3772689.5	365.1	3.70	1.67	1.93 YES
L0001766	0	0.60310E-07	436381.8	3772693.1	365.2	3.70	1.67	1.93 YES
L0001767	0	0.60310E-07	436381.8	3772696.7	365.4	3.70	1.67	1.93 YES
L0001768	0	0.60310E-07	436381.8	3772700.3	365.5	3.70	1.67	1.93 YES
L0001769	0	0.60310E-07	436381.9	3772703.9	365.6	3.70	1.67	1.93 YES
L0001770	0	0.60310E-07	436381.9	3772707.5	365.7	3.70	1.67	1.93 YES
L0001771	0	0.60310E-07	436381.9	3772711.1	365.8	3.70	1.67	1.93 YES

```
 L0001772         0   0.60310E-07  436382.0 3772714.7   365.9     3.70     1.67
1.93     YES
 L0001773         0   0.60310E-07  436382.0 3772718.3   366.0     3.70     1.67
1.93     YES
 L0001774         0   0.60310E-07  436382.0 3772721.9   366.1     3.70     1.67
1.93     YES
 L0001775         0   0.60310E-07  436382.1 3772725.5   366.3     3.70     1.67
1.93     YES
 L0001776         0   0.60310E-07  436382.1 3772729.1   366.4     3.70     1.67
1.93     YES
 L0001777         0   0.60310E-07  436382.1 3772732.7   366.5     3.70     1.67
1.93     YES
 L0001778         0   0.60310E-07  436382.2 3772736.3   366.6     3.70     1.67
1.93     YES
 L0001779         0   0.60310E-07  436382.2 3772739.9   366.7     3.70     1.67
1.93     YES
 L0001780         0   0.60310E-07  436382.2 3772743.5   366.9     3.70     1.67
1.93     YES
 L0001781         0   0.60310E-07  436382.2 3772747.1   367.0     3.70     1.67
1.93     YES
 L0001782         0   0.60310E-07  436382.3 3772750.7   367.2     3.70     1.67
1.93     YES
 *** AERMOD - VERSION  19191 ***   *** C:\Lakes\AERMOD View\Bridge Upland\Bridge
Upland.isc                  ***        01/15/20
 *** AERMET - VERSION  16216 ***   ***
                        ***        13:48:55

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 *** MODELOPTs:    RegDFAULT  CONC  ELEV  URBAN  ADJ_U*


                                                    *** VOLUME SOURCE DATA ***

               NUMBER EMISSION RATE                    BASE    RELEASE    INIT.
INIT.   URBAN  EMISSION RATE
   SOURCE       PART.  (GRAMS/SEC)     X        Y      ELEV.   HEIGHT      SY
SZ     SOURCE  SCALAR VARY
     ID         CATS.               (METERS) (METERS) (METERS) (METERS) (METERS)
(METERS)             BY
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 L0001783         0   0.60310E-07  436382.3 3772754.3   367.3     3.70     1.67
1.93     YES
 L0001784         0   0.60310E-07  436382.3 3772757.9   367.4     3.70     1.67
1.93     YES
 L0001785         0   0.60310E-07  436382.4 3772761.5   367.6     3.70     1.67
1.93     YES
```

L0001786	0	0.60310E-07	436382.4	3772765.1	367.7	3.70	1.67	1.93 YES
L0001787	0	0.60310E-07	436382.4	3772768.7	367.8	3.70	1.67	1.93 YES
L0001788	0	0.60310E-07	436382.5	3772772.3	367.9	3.70	1.67	1.93 YES
L0001789	0	0.60310E-07	436382.5	3772775.9	368.0	3.70	1.67	1.93 YES
L0001790	0	0.60310E-07	436382.5	3772779.5	368.1	3.70	1.67	1.93 YES
L0001791	0	0.60310E-07	436382.6	3772783.1	368.2	3.70	1.67	1.93 YES
L0001792	0	0.60310E-07	436382.6	3772786.7	368.3	3.70	1.67	1.93 YES
L0001793	0	0.60310E-07	436382.6	3772790.3	368.4	3.70	1.67	1.93 YES
L0001794	0	0.60310E-07	436382.6	3772793.9	368.5	3.70	1.67	1.93 YES
L0001795	0	0.60310E-07	436382.7	3772797.5	368.6	3.70	1.67	1.93 YES
L0001796	0	0.60310E-07	436382.7	3772801.1	368.6	3.70	1.67	1.93 YES
L0001797	0	0.60310E-07	436382.7	3772804.7	368.6	3.70	1.67	1.93 YES
L0001798	0	0.60310E-07	436382.8	3772808.3	368.7	3.70	1.67	1.93 YES
L0001799	0	0.60310E-07	436382.8	3772811.9	368.7	3.70	1.67	1.93 YES
L0001800	0	0.60310E-07	436382.8	3772815.5	368.7	3.70	1.67	1.93 YES
L0001801	0	0.60310E-07	436382.9	3772819.1	368.8	3.70	1.67	1.93 YES
L0001802	0	0.60310E-07	436382.9	3772822.7	368.8	3.70	1.67	1.93 YES
L0001803	0	0.60310E-07	436382.9	3772826.3	368.9	3.70	1.67	1.93 YES
L0001804	0	0.60310E-07	436383.0	3772829.9	368.9	3.70	1.67	1.93 YES
L0001805	0	0.60310E-07	436383.0	3772833.5	369.0	3.70	1.67	1.93 YES
L0001806	0	0.60310E-07	436383.0	3772837.1	369.0	3.70	1.67	1.93 YES
L0001807	0	0.60310E-07	436383.0	3772840.7	369.1	3.70	1.67	1.93 YES
L0001808	0	0.60310E-07	436383.1	3772844.3	369.1	3.70	1.67	1.93 YES
L0001809	0	0.60310E-07	436383.1	3772847.9	369.2	3.70	1.67	1.93 YES

 L0001810   0   0.60310E-07 436383.1 3772851.5   369.2   3.70   1.67
1.93   YES
 L0001811   0   0.60310E-07 436383.2 3772855.1   369.3   3.70   1.67
1.93   YES
 L0001812   0   0.60310E-07 436383.2 3772858.7   369.4   3.70   1.67
1.93   YES
 L0001813   0   0.60310E-07 436383.2 3772862.3   369.4   3.70   1.67
1.93   YES
 L0001814   0   0.60310E-07 436383.3 3772865.9   369.5   3.70   1.67
1.93   YES
 L0001815   0   0.60310E-07 436383.3 3772869.5   369.6   3.70   1.67
1.93   YES
 L0001816   0   0.60310E-07 436383.3 3772873.1   369.7   3.70   1.67
1.93   YES
 L0001817   0   0.60310E-07 436383.4 3772876.7   369.8   3.70   1.67
1.93   YES
 L0001818   0   0.60310E-07 436383.4 3772880.3   369.8   3.70   1.67
1.93   YES
 L0001819   0   0.60310E-07 436383.4 3772883.9   369.9   3.70   1.67
1.93   YES
 L0001820   0   0.60310E-07 436383.4 3772887.5   370.0   3.70   1.67
1.93   YES
 L0001821   0   0.60310E-07 436383.5 3772891.1   370.1   3.70   1.67
1.93   YES
 L0001822   0   0.60310E-07 436383.5 3772894.7   370.2   3.70   1.67
1.93   YES

 *** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

                                                    *** VOLUME SOURCE DATA ***

               NUMBER EMISSION RATE   BASE   RELEASE   INIT.
INIT.   URBAN EMISSION RATE
   SOURCE   PART. (GRAMS/SEC)   X   Y   ELEV.   HEIGHT   SY
SZ   SOURCE SCALAR VARY
     ID   CATS.   (METERS) (METERS) (METERS) (METERS) (METERS)
(METERS)   BY
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 L0001823   0   0.60310E-07 436383.5 3772898.3   370.2   3.70   1.67
1.93   YES

L0001824	0	0.60310E-07	436383.6	3772901.9	370.3	3.70	1.67	1.93 YES
L0001825	0	0.60310E-07	436383.6	3772905.5	370.4	3.70	1.67	1.93 YES
L0001826	0	0.60310E-07	436383.6	3772909.1	370.5	3.70	1.67	1.93 YES
L0001827	0	0.60310E-07	436383.7	3772912.7	370.6	3.70	1.67	1.93 YES
L0001828	0	0.60310E-07	436383.7	3772916.3	370.7	3.70	1.67	1.93 YES
L0001829	0	0.60310E-07	436383.7	3772919.9	370.8	3.70	1.67	1.93 YES
L0001830	0	0.60310E-07	436383.8	3772923.5	370.9	3.70	1.67	1.93 YES
L0001831	0	0.60310E-07	436383.8	3772927.1	371.0	3.70	1.67	1.93 YES
L0001832	0	0.60310E-07	436383.8	3772930.7	371.1	3.70	1.67	1.93 YES
L0001833	0	0.60310E-07	436383.8	3772934.3	371.2	3.70	1.67	1.93 YES
L0001834	0	0.60310E-07	436383.9	3772937.9	371.3	3.70	1.67	1.93 YES
L0001835	0	0.60310E-07	436383.9	3772941.5	371.4	3.70	1.67	1.93 YES
L0001836	0	0.60310E-07	436383.9	3772945.1	371.5	3.70	1.67	1.93 YES
L0001837	0	0.60310E-07	436384.0	3772948.7	371.6	3.70	1.67	1.93 YES
L0001838	0	0.60310E-07	436384.0	3772952.3	371.7	3.70	1.67	1.93 YES
L0001839	0	0.60310E-07	436384.0	3772955.9	371.8	3.70	1.67	1.93 YES
L0001840	0	0.60310E-07	436384.1	3772959.5	371.9	3.70	1.67	1.93 YES
L0001841	0	0.60310E-07	436384.1	3772963.1	371.9	3.70	1.67	1.93 YES
L0001842	0	0.60310E-07	436384.1	3772966.7	372.0	3.70	1.67	1.93 YES
L0001843	0	0.60310E-07	436384.2	3772970.3	372.1	3.70	1.67	1.93 YES
L0001844	0	0.60310E-07	436384.2	3772973.9	372.2	3.70	1.67	1.93 YES
L0001845	0	0.60310E-07	436384.2	3772977.5	372.3	3.70	1.67	1.93 YES
L0001846	0	0.60310E-07	436384.2	3772981.1	372.4	3.70	1.67	1.93 YES
L0001847	0	0.60310E-07	436384.3	3772984.7	372.6	3.70	1.67	1.93 YES

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 L0001848         0   0.60310E-07  436384.3 3772988.3   372.7     3.70     1.67
1.93     YES
 L0001849         0   0.60310E-07  436384.3 3772991.9   372.9     3.70     1.67
1.93     YES
 L0001850         0   0.60310E-07  436384.4 3772995.5   373.0     3.70     1.67
1.93     YES
 L0001851         0   0.60310E-07  436384.4 3772999.1   373.1     3.70     1.67
1.93     YES
 L0001852         0   0.60310E-07  436384.4 3773002.7   373.3     3.70     1.67
1.93     YES
 L0001853         0   0.60310E-07  436384.5 3773006.3   373.4     3.70     1.67
1.93     YES
 L0001854         0   0.60310E-07  436384.5 3773009.9   373.6     3.70     1.67
1.93     YES
 L0001855         0   0.60310E-07  436384.5 3773013.5   373.7     3.70     1.67
1.93     YES
 L0001856         0   0.60310E-07  436384.6 3773017.1   373.8     3.70     1.67
1.93     YES
 L0001857         0   0.60310E-07  436384.6 3773020.7   374.0     3.70     1.67
1.93     YES
 L0001858         0   0.60310E-07  436384.6 3773024.3   374.1     3.70     1.67
1.93     YES
 L0001859         0   0.60310E-07  436384.6 3773027.9   374.3     3.70     1.67
1.93     YES
 L0001860         0   0.60310E-07  436384.7 3773031.5   374.4     3.70     1.67
1.93     YES
 L0001861         0   0.60310E-07  436384.7 3773035.1   374.6     3.70     1.67
1.93     YES
 L0001862         0   0.60310E-07  436384.7 3773038.7   374.7     3.70     1.67
1.93     YES
 *** AERMOD - VERSION  19191 ***   *** C:\Lakes\AERMOD View\Bridge Upland\Bridge
Upland.isc                  ***        01/15/20
 *** AERMET - VERSION  16216 ***   ***
                       ***        13:48:55

                                  PAGE  10
 *** MODELOPTs:    RegDFAULT  CONC  ELEV  URBAN  ADJ_U*


                                                    *** VOLUME SOURCE DATA ***

              NUMBER EMISSION RATE                    BASE    RELEASE    INIT.
INIT.   URBAN  EMISSION RATE
   SOURCE       PART.  (GRAMS/SEC)     X        Y      ELEV.   HEIGHT      SY
SZ     SOURCE  SCALAR VARY
     ID         CATS.               (METERS) (METERS) (METERS) (METERS) (METERS)
(METERS)             BY
 - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
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L0001863	0	0.60310E-07	436384.8	3773042.3	374.8	3.70	1.67	1.93 YES
L0001864	0	0.60310E-07	436384.8	3773045.9	375.0	3.70	1.67	1.93 YES
L0001865	0	0.60310E-07	436384.8	3773049.5	375.1	3.70	1.67	1.93 YES
L0001866	0	0.60310E-07	436384.9	3773053.1	375.2	3.70	1.67	1.93 YES
L0001867	0	0.60310E-07	436384.9	3773056.7	375.3	3.70	1.67	1.93 YES
L0001868	0	0.60310E-07	436384.9	3773060.3	375.4	3.70	1.67	1.93 YES
L0001869	0	0.60310E-07	436385.0	3773063.9	375.6	3.70	1.67	1.93 YES
L0001870	0	0.60310E-07	436385.0	3773067.5	375.7	3.70	1.67	1.93 YES
L0001871	0	0.60310E-07	436385.0	3773071.1	375.8	3.70	1.67	1.93 YES
L0001872	0	0.60310E-07	436385.0	3773074.7	375.9	3.70	1.67	1.93 YES
L0001873	0	0.60310E-07	436385.1	3773078.3	376.0	3.70	1.67	1.93 YES
L0001874	0	0.60310E-07	436385.1	3773081.9	376.0	3.70	1.67	1.93 YES
L0001875	0	0.60310E-07	436385.1	3773085.5	376.1	3.70	1.67	1.93 YES
L0001876	0	0.60310E-07	436385.2	3773089.1	376.1	3.70	1.67	1.93 YES
L0001877	0	0.60310E-07	436385.2	3773092.7	376.2	3.70	1.67	1.93 YES
L0001878	0	0.60310E-07	436385.2	3773096.3	376.2	3.70	1.67	1.93 YES
L0001879	0	0.60310E-07	436385.3	3773099.9	376.3	3.70	1.67	1.93 YES
L0001880	0	0.60310E-07	436385.3	3773103.5	376.3	3.70	1.67	1.93 YES
L0001881	0	0.60310E-07	436385.3	3773107.1	376.4	3.70	1.67	1.93 YES
L0001882	0	0.60310E-07	436385.3	3773110.7	376.4	3.70	1.67	1.93 YES
L0001883	0	0.60310E-07	436385.3	3773114.3	376.5	3.70	1.67	1.93 YES
L0001884	0	0.60310E-07	436385.3	3773117.9	376.5	3.70	1.67	1.93 YES
L0001885	0	0.60310E-07	436385.4	3773121.5	376.6	3.70	1.67	1.93 YES

L0001886	0	0.60310E-07	436385.4	3773125.1	376.6	3.70	1.67	1.93	YES
L0001887	0	0.60310E-07	436385.4	3773128.7	376.7	3.70	1.67	1.93	YES
L0001888	0	0.60310E-07	436385.4	3773132.3	376.7	3.70	1.67	1.93	YES
L0001889	0	0.60310E-07	436385.4	3773135.9	376.8	3.70	1.67	1.93	YES
L0001890	0	0.60310E-07	436385.4	3773139.5	376.8	3.70	1.67	1.93	YES
L0001891	0	0.60310E-07	436385.5	3773143.1	376.9	3.70	1.67	1.93	YES
L0001892	0	0.60310E-07	436385.5	3773146.7	377.0	3.70	1.67	1.93	YES
L0001893	0	0.60310E-07	436385.5	3773150.3	377.0	3.70	1.67	1.93	YES
L0001894	0	0.60310E-07	436385.5	3773153.9	377.1	3.70	1.67	1.93	YES
L0001895	0	0.60310E-07	436385.5	3773157.5	377.2	3.70	1.67	1.93	YES
L0001896	0	0.60310E-07	436385.5	3773161.1	377.2	3.70	1.67	1.93	YES
L0001897	0	0.60310E-07	436385.5	3773164.7	377.3	3.70	1.67	1.93	YES
L0001898	0	0.60310E-07	436385.6	3773168.3	377.4	3.70	1.67	1.93	YES
L0001899	0	0.60310E-07	436385.6	3773171.9	377.5	3.70	1.67	1.93	YES
L0001900	0	0.60310E-07	436385.6	3773175.5	377.6	3.70	1.67	1.93	YES
L0001901	0	0.60310E-07	436385.6	3773179.1	377.8	3.70	1.67	1.93	YES
L0001902	0	0.60310E-07	436385.6	3773182.7	377.9	3.70	1.67	1.93	YES

*** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

*** VOLUME SOURCE DATA ***

SOURCE	NUMBER PART.	EMISSION RATE (GRAMS/SEC)	X	Y	BASE ELEV.	RELEASE HEIGHT	INIT. SY	INIT.	URBAN	EMISSION RATE

SZ	SOURCE ID	SCALAR CATS.	VARY BY	(METERS)	(METERS)	(METERS)	(METERS)	(METERS)	(METERS)
	L0001903	0	0.60310E-07	436385.6	3773186.3	378.0	3.70	1.67	1.93
	YES								
	L0001904	0	0.60310E-07	436385.7	3773189.9	378.1	3.70	1.67	1.93
	YES								
	L0001905	0	0.60310E-07	436385.7	3773193.5	378.2	3.70	1.67	1.93
	YES								
	L0001906	0	0.60310E-07	436385.7	3773197.1	378.3	3.70	1.67	1.93
	YES								
	L0001907	0	0.60310E-07	436385.7	3773200.7	378.4	3.70	1.67	1.93
	YES								
	L0001908	0	0.60310E-07	436385.7	3773204.3	378.5	3.70	1.67	1.93
	YES								
	L0001909	0	0.60310E-07	436385.7	3773207.9	378.7	3.70	1.67	1.93
	YES								
	L0001910	0	0.60310E-07	436385.7	3773211.5	378.8	3.70	1.67	1.93
	YES								
	L0001911	0	0.60310E-07	436385.8	3773215.1	378.9	3.70	1.67	1.93
	YES								
	L0001912	0	0.60310E-07	436385.8	3773218.7	379.0	3.70	1.67	1.93
	YES								
	L0001913	0	0.60310E-07	436385.8	3773222.3	379.1	3.70	1.67	1.93
	YES								
	L0001914	0	0.60310E-07	436385.8	3773225.9	379.2	3.70	1.67	1.93
	YES								
	L0001915	0	0.60310E-07	436385.8	3773229.5	379.3	3.70	1.67	1.93
	YES								
	L0001916	0	0.60310E-07	436385.8	3773233.1	379.4	3.70	1.67	1.93
	YES								
	L0001917	0	0.60310E-07	436385.9	3773236.7	379.5	3.70	1.67	1.93
	YES								
	L0001918	0	0.60310E-07	436385.9	3773240.3	379.6	3.70	1.67	1.93
	YES								
	L0001919	0	0.60310E-07	436385.9	3773243.9	379.7	3.70	1.67	1.93
	YES								
	L0001920	0	0.60310E-07	436385.9	3773247.5	379.8	3.70	1.67	1.93
	YES								
	L0001921	0	0.60310E-07	436385.9	3773251.1	379.9	3.70	1.67	1.93
	YES								
	L0001922	0	0.60310E-07	436385.9	3773254.7	380.1	3.70	1.67	1.93
	YES								
	L0001923	0	0.60310E-07	436385.9	3773258.3	380.2	3.70	1.67	1.93
	YES								

L0001924	0	0.60310E-07	436386.0	3773261.9	380.3	3.70	1.67	1.93 YES
L0001925	0	0.60310E-07	436386.0	3773265.5	380.4	3.70	1.67	1.93 YES
L0001926	0	0.60310E-07	436386.0	3773269.1	380.5	3.70	1.67	1.93 YES
L0001927	0	0.60310E-07	436386.0	3773272.7	380.6	3.70	1.67	1.93 YES
L0001928	0	0.60310E-07	436386.0	3773276.3	380.7	3.70	1.67	1.93 YES
L0001929	0	0.60310E-07	436386.0	3773279.9	380.8	3.70	1.67	1.93 YES
L0001930	0	0.60310E-07	436386.1	3773283.5	380.9	3.70	1.67	1.93 YES
L0001931	0	0.60310E-07	436386.1	3773287.1	381.0	3.70	1.67	1.93 YES
L0001932	0	0.60310E-07	436386.1	3773290.7	381.1	3.70	1.67	1.93 YES
L0001933	0	0.60310E-07	436386.1	3773294.3	381.2	3.70	1.67	1.93 YES
L0001934	0	0.60310E-07	436386.1	3773297.9	381.3	3.70	1.67	1.93 YES
L0001935	0	0.60310E-07	436386.1	3773301.5	381.4	3.70	1.67	1.93 YES
L0001936	0	0.60310E-07	436386.1	3773305.1	381.5	3.70	1.67	1.93 YES
L0001937	0	0.60310E-07	436386.2	3773308.7	381.7	3.70	1.67	1.93 YES
L0001938	0	0.60310E-07	436386.2	3773312.3	381.8	3.70	1.67	1.93 YES
L0001939	0	0.60310E-07	436386.2	3773315.9	381.9	3.70	1.67	1.93 YES
L0001940	0	0.60310E-07	436386.2	3773319.5	382.0	3.70	1.67	1.93 YES
L0001941	0	0.60310E-07	436386.2	3773323.1	382.1	3.70	1.67	1.93 YES
L0001942	0	0.60310E-07	436386.2	3773326.7	382.2	3.70	1.67	1.93 YES

*** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

*** VOLUME SOURCE DATA ***

SOURCE ID	NUMBER PART. SCALAR CATS.	EMISSION RATE (GRAMS/SEC)	X (METERS)	Y (METERS)	BASE ELEV. (METERS)	RELEASE HEIGHT (METERS)	INIT. SY (METERS)	INIT. SZ	URBAN SOURCE VARY BY
L0001943	0	0.60310E-07	436386.3	3773330.3	382.3	3.70	1.67	1.93	YES
L0001944	0	0.60310E-07	436386.3	3773333.9	382.4	3.70	1.67	1.93	YES
L0001945	0	0.60310E-07	436386.3	3773337.5	382.5	3.70	1.67	1.93	YES
L0001946	0	0.60310E-07	436386.3	3773341.1	382.6	3.70	1.67	1.93	YES
L0001947	0	0.60310E-07	436386.3	3773344.7	382.7	3.70	1.67	1.93	YES
L0001948	0	0.60310E-07	436386.3	3773348.3	382.8	3.70	1.67	1.93	YES
L0001949	0	0.60310E-07	436386.3	3773351.9	382.9	3.70	1.67	1.93	YES
L0001950	0	0.60310E-07	436386.4	3773355.5	383.0	3.70	1.67	1.93	YES
L0001951	0	0.60310E-07	436386.4	3773359.1	383.2	3.70	1.67	1.93	YES
L0001952	0	0.60310E-07	436386.4	3773362.7	383.3	3.70	1.67	1.93	YES
L0001953	0	0.60310E-07	436386.4	3773366.3	383.4	3.70	1.67	1.93	YES
L0001954	0	0.60310E-07	436386.4	3773369.9	383.5	3.70	1.67	1.93	YES
L0001955	0	0.60310E-07	436386.4	3773373.5	383.6	3.70	1.67	1.93	YES
L0001956	0	0.60310E-07	436386.5	3773377.1	383.7	3.70	1.67	1.93	YES
L0001957	0	0.60310E-07	436386.5	3773380.7	383.8	3.70	1.67	1.93	YES
L0001958	0	0.60310E-07	436386.5	3773384.3	383.9	3.70	1.67	1.93	YES
L0001959	0	0.60310E-07	436386.5	3773387.9	384.1	3.70	1.67	1.93	YES
L0001960	0	0.60310E-07	436386.5	3773391.5	384.2	3.70	1.67	1.93	YES
L0001961	0	0.60310E-07	436386.5	3773395.1	384.3	3.70	1.67	1.93	YES

L0001962	0	0.60310E-07	436386.5	3773398.7	384.4	3.70	1.67	1.93 YES
L0001963	0	0.60310E-07	436386.6	3773402.3	384.5	3.70	1.67	1.93 YES
L0001964	0	0.60310E-07	436386.6	3773405.9	384.6	3.70	1.67	1.93 YES
L0001965	0	0.60310E-07	436386.6	3773409.5	384.7	3.70	1.67	1.93 YES
L0001966	0	0.60310E-07	436386.6	3773413.1	384.8	3.70	1.67	1.93 YES
L0001967	0	0.60310E-07	436386.6	3773416.7	384.9	3.70	1.67	1.93 YES
L0001968	0	0.60310E-07	436386.6	3773420.3	385.1	3.70	1.67	1.93 YES
L0001969	0	0.60310E-07	436386.7	3773423.9	385.2	3.70	1.67	1.93 YES
L0001970	0	0.60310E-07	436386.7	3773427.5	385.3	3.70	1.67	1.93 YES
L0001971	0	0.60310E-07	436386.7	3773431.1	385.4	3.70	1.67	1.93 YES
L0001972	0	0.60310E-07	436386.7	3773434.7	385.6	3.70	1.67	1.93 YES
L0001973	0	0.60310E-07	436386.7	3773438.3	385.7	3.70	1.67	1.93 YES
L0001974	0	0.60310E-07	436386.7	3773441.9	385.8	3.70	1.67	1.93 YES
L0001975	0	0.60310E-07	436386.7	3773445.5	385.9	3.70	1.67	1.93 YES
L0001976	0	0.60310E-07	436386.7	3773449.1	386.1	3.70	1.67	1.93 YES
L0001977	0	0.60310E-07	436386.7	3773452.7	386.2	3.70	1.67	1.93 YES
L0001978	0	0.60310E-07	436386.7	3773456.3	386.3	3.70	1.67	1.93 YES
L0001979	0	0.60310E-07	436386.7	3773459.9	386.4	3.70	1.67	1.93 YES
L0001980	0	0.60310E-07	436386.7	3773463.5	386.6	3.70	1.67	1.93 YES
L0001981	0	0.60310E-07	436386.8	3773467.1	386.7	3.70	1.67	1.93 YES
L0001982	0	0.60310E-07	436386.8	3773470.7	386.8	3.70	1.67	1.93 YES

*** AERMOD - VERSION 19191 *** *** C:\Lakes\AERMOD View\Bridge Upland\Bridge Upland.isc *** 01/15/20
*** AERMET - VERSION 16216 *** *** 13:48:55

*** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

*** VOLUME SOURCE DATA ***

SOURCE ID	NUMBER EMISSION RATE PART. SCALAR CATS.	EMISSION RATE (GRAMS/SEC) VARY BY	X (METERS)	Y (METERS)	BASE ELEV. (METERS)	RELEASE HEIGHT (METERS)	INIT. SY (METERS)	INIT. SZ	URBAN SOURCE
L0001983	0	0.60310E-07	436386.8	3773474.3	386.9	3.70	1.67	1.93	YES
L0001984	0	0.60310E-07	436386.8	3773477.9	387.0	3.70	1.67	1.93	YES
L0001985	0	0.60310E-07	436386.8	3773481.5	387.1	3.70	1.67	1.93	YES
L0001986	0	0.60310E-07	436386.8	3773485.1	387.2	3.70	1.67	1.93	YES
L0001987	0	0.60310E-07	436386.8	3773488.7	387.4	3.70	1.67	1.93	YES
L0001988	0	0.60310E-07	436386.8	3773492.3	387.5	3.70	1.67	1.93	YES
L0001989	0	0.60310E-07	436386.8	3773495.9	387.6	3.70	1.67	1.93	YES
L0001990	0	0.60310E-07	436386.8	3773499.5	387.7	3.70	1.67	1.93	YES
L0001991	0	0.60310E-07	436386.8	3773503.1	387.8	3.70	1.67	1.93	YES
L0001992	0	0.60310E-07	436386.9	3773506.7	387.9	3.70	1.67	1.93	YES
L0001993	0	0.60310E-07	436386.9	3773510.3	388.0	3.70	1.67	1.93	YES
L0001994	0	0.60310E-07	436386.9	3773513.9	388.2	3.70	1.67	1.93	YES
L0001995	0	0.60310E-07	436386.9	3773517.5	388.3	3.70	1.67	1.93	YES
L0001996	0	0.60310E-07	436386.9	3773521.1	388.4	3.70	1.67	1.93	YES
L0001997	0	0.60310E-07	436386.9	3773524.7	388.5	3.70	1.67	1.93	YES
L0001998	0	0.60310E-07	436386.9	3773528.3	388.6	3.70	1.67	1.93	YES
L0001999	0	0.60310E-07	436386.9	3773531.9	388.8	3.70	1.67	1.93	YES

L0002000	0	0.60310E-07	436386.9	3773535.5	388.9	3.70	1.67	1.93 YES
L0002001	0	0.60310E-07	436386.9	3773539.1	389.0	3.70	1.67	1.93 YES
L0002002	0	0.60310E-07	436386.9	3773542.7	389.1	3.70	1.67	1.93 YES
L0002003	0	0.60310E-07	436387.0	3773546.3	389.2	3.70	1.67	1.93 YES
L0002004	0	0.60310E-07	436387.0	3773549.9	389.4	3.70	1.67	1.93 YES
L0002005	0	0.60310E-07	436387.0	3773553.5	389.5	3.70	1.67	1.93 YES
L0002006	0	0.60310E-07	436387.0	3773557.1	389.6	3.70	1.67	1.93 YES
L0002007	0	0.60310E-07	436387.0	3773560.7	389.7	3.70	1.67	1.93 YES
L0002008	0	0.60310E-07	436387.0	3773564.3	389.8	3.70	1.67	1.93 YES
L0002009	0	0.60310E-07	436387.0	3773567.9	389.9	3.70	1.67	1.93 YES
L0002010	0	0.60310E-07	436387.0	3773571.5	390.1	3.70	1.67	1.93 YES
L0002011	0	0.60310E-07	436387.0	3773575.1	390.2	3.70	1.67	1.93 YES
L0002012	0	0.60310E-07	436387.0	3773578.7	390.3	3.70	1.67	1.93 YES
L0002013	0	0.60310E-07	436387.0	3773582.3	390.4	3.70	1.67	1.93 YES
L0002014	0	0.60310E-07	436387.0	3773585.9	390.5	3.70	1.67	1.93 YES
L0002015	0	0.60310E-07	436387.1	3773589.5	390.6	3.70	1.67	1.93 YES
L0002016	0	0.60310E-07	436387.1	3773593.1	390.7	3.70	1.67	1.93 YES
L0002017	0	0.60310E-07	436387.1	3773596.7	390.8	3.70	1.67	1.93 YES
L0002018	0	0.60310E-07	436387.1	3773600.3	391.0	3.70	1.67	1.93 YES
L0002019	0	0.60310E-07	436387.1	3773603.9	391.1	3.70	1.67	1.93 YES
L0002020	0	0.60310E-07	436387.1	3773607.5	391.2	3.70	1.67	1.93 YES
L0002021	0	0.60310E-07	436387.1	3773611.1	391.3	3.70	1.67	1.93 YES
L0002022	0	0.60310E-07	436387.1	3773614.7	391.4	3.70	1.67	1.93 YES

*** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

*** VOLUME SOURCE DATA ***

SOURCE ID	NUMBER EMISSION RATE PART. SCALAR CATS.	EMISSION RATE (GRAMS/SEC) VARY BY	X (METERS)	Y (METERS)	BASE ELEV. (METERS)	RELEASE HEIGHT (METERS)	INIT. SY (METERS)	INIT. SZ (METERS)	URBAN SOURCE
L0002023	0	0.60310E-07	436387.1	3773618.3	391.6	3.70	1.67	1.93	YES
L0002024	0	0.60310E-07	436387.1	3773621.9	391.7	3.70	1.67	1.93	YES
L0002025	0	0.60310E-07	436387.1	3773625.5	391.8	3.70	1.67	1.93	YES
L0002026	0	0.60310E-07	436387.2	3773629.1	391.9	3.70	1.67	1.93	YES
L0002027	0	0.60310E-07	436387.2	3773632.7	392.1	3.70	1.67	1.93	YES
L0002028	0	0.60310E-07	436387.2	3773636.3	392.2	3.70	1.67	1.93	YES
L0002029	0	0.60310E-07	436387.2	3773639.9	392.3	3.70	1.67	1.93	YES
L0002030	0	0.60310E-07	436387.2	3773643.5	392.4	3.70	1.67	1.93	YES
L0002031	0	0.60310E-07	436387.2	3773647.1	392.5	3.70	1.67	1.93	YES
L0002032	0	0.60310E-07	436387.2	3773650.7	392.6	3.70	1.67	1.93	YES
L0002033	0	0.60310E-07	436387.2	3773654.3	392.8	3.70	1.67	1.93	YES
L0002034	0	0.60310E-07	436387.2	3773657.9	392.9	3.70	1.67	1.93	YES
L0002035	0	0.60310E-07	436387.2	3773661.5	393.0	3.70	1.67	1.93	YES
L0002036	0	0.60310E-07	436387.2	3773665.1	393.1	3.70	1.67	1.93	YES
L0002037	0	0.60310E-07	436387.2	3773668.7	393.3	3.70	1.67	1.93	YES

L0002038	0	0.60310E-07	436387.3	3773672.3	393.4	3.70	1.67	1.93 YES
L0002039	0	0.60310E-07	436387.3	3773675.9	393.5	3.70	1.67	1.93 YES
L0002040	0	0.60310E-07	436387.3	3773679.5	393.7	3.70	1.67	1.93 YES
L0002041	0	0.60310E-07	436387.3	3773683.1	393.8	3.70	1.67	1.93 YES
L0002042	0	0.60310E-07	436387.3	3773686.7	393.9	3.70	1.67	1.93 YES
L0002043	0	0.60310E-07	436387.3	3773690.3	394.0	3.70	1.67	1.93 YES
L0002044	0	0.60310E-07	436387.3	3773693.9	394.2	3.70	1.67	1.93 YES
L0002045	0	0.60310E-07	436387.3	3773697.5	394.3	3.70	1.67	1.93 YES
L0002046	0	0.60310E-07	436387.3	3773701.1	394.4	3.70	1.67	1.93 YES
L0002047	0	0.60310E-07	436387.3	3773704.7	394.6	3.70	1.67	1.93 YES
L0002048	0	0.60310E-07	436387.3	3773708.3	394.7	3.70	1.67	1.93 YES
L0002049	0	0.60310E-07	436387.4	3773711.9	394.9	3.70	1.67	1.93 YES
L0002050	0	0.60310E-07	436387.4	3773715.5	395.0	3.70	1.67	1.93 YES
L0002051	0	0.60310E-07	436387.4	3773719.1	395.1	3.70	1.67	1.93 YES
L0002052	0	0.60310E-07	436387.4	3773722.7	395.3	3.70	1.67	1.93 YES
L0002053	0	0.60310E-07	436387.4	3773726.3	395.4	3.70	1.67	1.93 YES
L0002054	0	0.60310E-07	436387.4	3773729.9	395.5	3.70	1.67	1.93 YES
L0002055	0	0.60310E-07	436387.4	3773733.5	395.7	3.70	1.67	1.93 YES
L0002056	0	0.60310E-07	436387.4	3773737.1	395.8	3.70	1.67	1.93 YES
L0002057	0	0.60310E-07	436387.4	3773740.7	395.9	3.70	1.67	1.93 YES
L0002058	0	0.60310E-07	436387.4	3773744.3	396.1	3.70	1.67	1.93 YES
L0002059	0	0.60310E-07	436387.4	3773747.9	396.2	3.70	1.67	1.93 YES
L0002060	0	0.60310E-07	436387.5	3773751.5	396.3	3.70	1.67	1.93 YES
L0002061	0	0.60310E-07	436387.5	3773755.1	396.4	3.70	1.67	1.93 YES

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 L0002062         0   0.60310E-07  436387.5 3773758.7   396.6     3.70     1.67
1.93     YES
 *** AERMOD - VERSION  19191 ***   *** C:\Lakes\AERMOD View\Bridge Upland\Bridge
Upland.isc                 ***        01/15/20
 *** AERMET - VERSION  16216 ***   ***
                         ***       13:48:55

                                   PAGE  15
 *** MODELOPTs:    RegDFAULT  CONC  ELEV  URBAN  ADJ_U*


                                                    *** VOLUME SOURCE DATA ***

               NUMBER EMISSION RATE                    BASE    RELEASE    INIT.
INIT.   URBAN  EMISSION RATE
   SOURCE       PART.  (GRAMS/SEC)     X        Y      ELEV.   HEIGHT      SY
SZ     SOURCE  SCALAR VARY
     ID         CATS.               (METERS) (METERS) (METERS) (METERS) (METERS)
(METERS)              BY
 - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
- - - - - - - - - - - - - - - - - - - - - - - -

 L0002063         0   0.60310E-07  436387.5 3773762.3   396.7     3.70     1.67
1.93     YES
 L0002064         0   0.60310E-07  436387.5 3773765.9   396.8     3.70     1.67
1.93     YES
 L0002065         0   0.60310E-07  436387.5 3773769.5   396.9     3.70     1.67
1.93     YES
 L0002066         0   0.60310E-07  436387.5 3773773.1   397.0     3.70     1.67
1.93     YES
 L0002067         0   0.60310E-07  436387.5 3773776.7   397.2     3.70     1.67
1.93     YES
 L0002068         0   0.60310E-07  436387.5 3773780.3   397.3     3.70     1.67
1.93     YES
 L0002069         0   0.60310E-07  436387.5 3773783.9   397.4     3.70     1.67
1.93     YES
 L0002070         0   0.60310E-07  436387.5 3773787.5   397.5     3.70     1.67
1.93     YES
 L0002071         0   0.60310E-07  436387.5 3773791.1   397.6     3.70     1.67
1.93     YES
 L0002072         0   0.60310E-07  436387.6 3773794.7   397.7     3.70     1.67
1.93     YES
 L0002073         0   0.60310E-07  436387.6 3773798.3   397.9     3.70     1.67
1.93     YES
 L0002074         0   0.60310E-07  436387.6 3773801.9   398.0     3.70     1.67
1.93     YES
 L0002075         0   0.60310E-07  436387.5 3773805.5   398.1     3.70     1.67
1.93     YES
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L0002076	0	0.60310E-07	436387.5	3773809.1	398.2	3.70	1.67
1.93	YES						
L0002077	0	0.60310E-07	436387.5	3773812.7	398.3	3.70	1.67
1.93	YES						
L0002078	0	0.60310E-07	436387.5	3773816.3	398.4	3.70	1.67
1.93	YES						
L0002079	0	0.60310E-07	436387.5	3773819.9	398.6	3.70	1.67
1.93	YES						
L0002080	0	0.60310E-07	436387.5	3773823.5	398.7	3.70	1.67
1.93	YES						
L0002081	0	0.60310E-07	436387.5	3773827.1	398.8	3.70	1.67
1.93	YES						
L0002082	0	0.60310E-07	436387.5	3773830.7	398.9	3.70	1.67
1.93	YES						
L0002083	0	0.60310E-07	436387.4	3773834.3	399.0	3.70	1.67
1.93	YES						
L0002084	0	0.60310E-07	436387.4	3773837.9	399.2	3.70	1.67
1.93	YES						
L0002085	0	0.60310E-07	436387.4	3773841.5	399.3	3.70	1.67
1.93	YES						
L0002086	0	0.60310E-07	436387.4	3773845.1	399.4	3.70	1.67
1.93	YES						
L0002087	0	0.60310E-07	436387.4	3773848.7	399.6	3.70	1.67
1.93	YES						
L0002088	0	0.60310E-07	436387.4	3773852.3	399.7	3.70	1.67
1.93	YES						
L0002089	0	0.60310E-07	436387.4	3773855.9	399.8	3.70	1.67
1.93	YES						
L0002090	0	0.60310E-07	436387.4	3773859.5	399.9	3.70	1.67
1.93	YES						
L0002091	0	0.60310E-07	436387.3	3773863.1	400.1	3.70	1.67
1.93	YES						
L0002092	0	0.60310E-07	436387.3	3773866.7	400.2	3.70	1.67
1.93	YES						
L0002093	0	0.60310E-07	436387.3	3773870.3	400.3	3.70	1.67
1.93	YES						
L0002094	0	0.60310E-07	436387.3	3773873.9	400.5	3.70	1.67
1.93	YES						
L0002095	0	0.60310E-07	436387.3	3773877.5	400.6	3.70	1.67
1.93	YES						
L0002096	0	0.60310E-07	436387.3	3773881.1	400.7	3.70	1.67
1.93	YES						
L0002097	0	0.60310E-07	436387.3	3773884.7	400.8	3.70	1.67
1.93	YES						
L0002098	0	0.60310E-07	436387.3	3773888.3	401.0	3.70	1.67
1.93	YES						
L0002099	0	0.60310E-07	436387.2	3773891.9	401.1	3.70	1.67
1.93	YES						

L0002100 0 0.60310E-07 436387.2 3773895.5 401.2 3.70 1.67 1.93 YES
L0002101 0 0.60310E-07 436387.2 3773899.1 401.4 3.70 1.67 1.93 YES
L0002102 0 0.60310E-07 436387.2 3773902.7 401.5 3.70 1.67 1.93 YES

*** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

*** VOLUME SOURCE DATA ***

SOURCE ID	NUMBER PART. CATS.	EMISSION RATE (GRAMS/SEC)	X (METERS)	Y (METERS)	BASE ELEV. (METERS)	RELEASE HEIGHT (METERS)	INIT. SY (METERS)	INIT. SZ (METERS)	URBAN SOURCE	EMISSION RATE SCALAR VARY BY
L0002103	0	0.60310E-07	436387.2	3773906.3	401.6	3.70	1.67	1.93	YES	
L0002104	0	0.60310E-07	436387.2	3773909.9	401.7	3.70	1.67	1.93	YES	
L0002105	0	0.60310E-07	436387.2	3773913.5	401.8	3.70	1.67	1.93	YES	
L0002106	0	0.60310E-07	436387.2	3773917.1	402.0	3.70	1.67	1.93	YES	
L0002107	0	0.60310E-07	436387.1	3773920.7	402.1	3.70	1.67	1.93	YES	
L0002108	0	0.60310E-07	436387.1	3773924.3	402.2	3.70	1.67	1.93	YES	
L0002109	0	0.60310E-07	436387.1	3773927.9	402.3	3.70	1.67	1.93	YES	
L0002110	0	0.60310E-07	436387.1	3773931.5	402.4	3.70	1.67	1.93	YES	
L0002111	0	0.60310E-07	436387.1	3773935.1	402.6	3.70	1.67	1.93	YES	
L0002112	0	0.60310E-07	436387.1	3773938.7	402.7	3.70	1.67	1.93	YES	
L0002113	0	0.60310E-07	436387.1	3773942.3	402.8	3.70	1.67	1.93	YES	

L0002114	0	0.60310E-07	436387.0	3773945.9	402.9	3.70	1.67	1.93 YES
L0002115	0	0.60310E-07	436387.0	3773949.5	403.1	3.70	1.67	1.93 YES
L0002116	0	0.60310E-07	436387.0	3773953.1	403.2	3.70	1.67	1.93 YES
L0002117	0	0.60310E-07	436387.0	3773956.7	403.3	3.70	1.67	1.93 YES
L0002118	0	0.60310E-07	436387.0	3773960.3	403.5	3.70	1.67	1.93 YES
L0002119	0	0.60310E-07	436387.0	3773963.9	403.6	3.70	1.67	1.93 YES
L0002120	0	0.60310E-07	436387.0	3773967.5	403.7	3.70	1.67	1.93 YES
L0002121	0	0.60310E-07	436387.0	3773971.1	403.9	3.70	1.67	1.93 YES
L0002122	0	0.60310E-07	436386.9	3773974.7	404.0	3.70	1.67	1.93 YES
L0002123	0	0.60310E-07	436386.9	3773978.3	404.1	3.70	1.67	1.93 YES
L0002124	0	0.60310E-07	436386.9	3773981.9	404.2	3.70	1.67	1.93 YES
L0002125	0	0.60310E-07	436386.9	3773985.5	404.4	3.70	1.67	1.93 YES
L0002126	0	0.60310E-07	436386.9	3773989.1	404.5	3.70	1.67	1.93 YES
L0002127	0	0.60310E-07	436386.9	3773992.7	404.6	3.70	1.67	1.93 YES
L0002128	0	0.60310E-07	436386.9	3773996.3	404.8	3.70	1.67	1.93 YES
L0002129	0	0.60310E-07	436386.9	3773999.9	404.9	3.70	1.67	1.93 YES
L0002130	0	0.60310E-07	436386.8	3774003.5	405.0	3.70	1.67	1.93 YES
L0002131	0	0.60310E-07	436386.8	3774007.1	405.1	3.70	1.67	1.93 YES
L0002132	0	0.60310E-07	436386.8	3774010.7	405.3	3.70	1.67	1.93 YES
L0002133	0	0.60310E-07	436386.8	3774014.3	405.4	3.70	1.67	1.93 YES
L0002134	0	0.60310E-07	436386.8	3774017.9	405.5	3.70	1.67	1.93 YES
L0002135	0	0.60310E-07	436386.8	3774021.5	405.7	3.70	1.67	1.93 YES
L0002136	0	0.60310E-07	436386.8	3774025.1	405.8	3.70	1.67	1.93 YES
L0002137	0	0.60310E-07	436386.8	3774028.7	405.9	3.70	1.67	1.93 YES

 L0002138   0   0.60310E-07 436386.7 3774032.3   406.1   3.70   1.67
1.93   YES
 L0002139   0   0.60310E-07 436386.7 3774035.9   406.2   3.70   1.67
1.93   YES
 L0002140   0   0.60310E-07 436386.7 3774039.5   406.3   3.70   1.67
1.93   YES
 L0002141   0   0.60310E-07 436386.7 3774043.1   406.4   3.70   1.67
1.93   YES
 L0002142   0   0.60310E-07 436386.7 3774046.7   406.5   3.70   1.67
1.93   YES

 *** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

                                                    *** VOLUME SOURCE DATA ***

              NUMBER EMISSION RATE   BASE   RELEASE   INIT.
INIT.   URBAN EMISSION RATE
   SOURCE   PART. (GRAMS/SEC)   X   Y   ELEV.   HEIGHT   SY
SZ   SOURCE SCALAR VARY
     ID   CATS.   (METERS) (METERS) (METERS) (METERS) (METERS)
(METERS)   BY
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- - - - - - - - - - - - - - - - - - - -

 L0002143   0   0.60310E-07 436386.7 3774050.3   406.6   3.70   1.67
1.93   YES
 L0002144   0   0.60310E-07 436386.7 3774053.9   406.8   3.70   1.67
1.93   YES
 L0002145   0   0.60310E-07 436386.7 3774057.5   406.9   3.70   1.67
1.93   YES
 L0002146   0   0.60310E-07 436386.6 3774061.1   407.0   3.70   1.67
1.93   YES
 L0002147   0   0.60310E-07 436386.6 3774064.7   407.1   3.70   1.67
1.93   YES
 L0002148   0   0.60310E-07 436386.6 3774068.3   407.2   3.70   1.67
1.93   YES
 L0002149   0   0.60310E-07 436386.6 3774071.9   407.4   3.70   1.67
1.93   YES
 L0002150   0   0.60310E-07 436386.6 3774075.5   407.5   3.70   1.67
1.93   YES
 L0002151   0   0.60310E-07 436386.6 3774079.1   407.6   3.70   1.67
1.93   YES

L0002152	0	0.60310E-07	436386.6	3774082.7	407.7	3.70	1.67
1.93	YES						
L0002153	0	0.60310E-07	436386.6	3774086.3	407.9	3.70	1.67
1.93	YES						
L0002154	0	0.60310E-07	436386.5	3774089.9	408.0	3.70	1.67
1.93	YES						
L0002155	0	0.60310E-07	436386.5	3774093.5	408.1	3.70	1.67
1.93	YES						
L0002156	0	0.60310E-07	436386.5	3774097.1	408.2	3.70	1.67
1.93	YES						
L0002157	0	0.60310E-07	436386.5	3774100.7	408.4	3.70	1.67
1.93	YES						
L0002158	0	0.60310E-07	436386.5	3774104.3	408.5	3.70	1.67
1.93	YES						
L0002159	0	0.60310E-07	436386.5	3774107.9	408.6	3.70	1.67
1.93	YES						
L0002160	0	0.60310E-07	436386.5	3774111.5	408.8	3.70	1.67
1.93	YES						
L0002161	0	0.60310E-07	436386.5	3774115.1	408.9	3.70	1.67
1.93	YES						
L0002162	0	0.60310E-07	436386.4	3774118.7	409.0	3.70	1.67
1.93	YES						
L0002163	0	0.60310E-07	436386.4	3774122.3	409.1	3.70	1.67
1.93	YES						
L0002164	0	0.60310E-07	436386.4	3774125.9	409.3	3.70	1.67
1.93	YES						
L0002165	0	0.60310E-07	436386.4	3774129.5	409.4	3.70	1.67
1.93	YES						
L0002166	0	0.60310E-07	436386.4	3774133.1	409.6	3.70	1.67
1.93	YES						
L0002167	0	0.60310E-07	436386.4	3774136.7	409.7	3.70	1.67
1.93	YES						
L0002168	0	0.60310E-07	436386.4	3774140.3	409.9	3.70	1.67
1.93	YES						
L0002169	0	0.60310E-07	436386.3	3774143.9	410.0	3.70	1.67
1.93	YES						
L0002170	0	0.60310E-07	436386.3	3774147.5	410.1	3.70	1.67
1.93	YES						
L0002171	0	0.60310E-07	436386.3	3774151.1	410.3	3.70	1.67
1.93	YES						
L0002172	0	0.60310E-07	436386.3	3774154.7	410.4	3.70	1.67
1.93	YES						
L0002173	0	0.60310E-07	436386.3	3774158.3	410.5	3.70	1.67
1.93	YES						
L0002174	0	0.60310E-07	436386.3	3774161.9	410.6	3.70	1.67
1.93	YES						
L0002175	0	0.60310E-07	436386.3	3774165.5	410.7	3.70	1.67
1.93	YES						

```
 L0002176         0   0.60310E-07  436386.3 3774169.1   410.8     3.70     1.67
1.93     YES
 L0002177         0   0.60310E-07  436386.2 3774172.7   410.9     3.70     1.67
1.93     YES
 L0002178         0   0.60310E-07  436386.2 3774176.3   411.1     3.70     1.67
1.93     YES
 L0002179         0   0.60310E-07  436386.2 3774179.9   411.2     3.70     1.67
1.93     YES
 L0002180         0   0.60310E-07  436386.2 3774183.5   411.3     3.70     1.67
1.93     YES
 L0002181         0   0.60310E-07  436386.2 3774187.1   411.3     3.70     1.67
1.93     YES
 L0002182         0   0.60310E-07  436386.2 3774190.7   411.4     3.70     1.67
1.93     YES
```



```
                                                      *** VOLUME SOURCE DATA ***

               NUMBER EMISSION RATE                     BASE    RELEASE    INIT.
INIT.   URBAN  EMISSION RATE
   SOURCE       PART.  (GRAMS/SEC)     X        Y      ELEV.   HEIGHT      SY
SZ     SOURCE  SCALAR VARY
     ID         CATS.               (METERS) (METERS) (METERS) (METERS) (METERS)
(METERS)             BY
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 L0002281         0   0.67710E-07  436386.0 3774194.5   411.5     3.70     1.67
1.93     YES
 L0002282         0   0.67710E-07  436385.9 3774198.1   411.6     3.70     1.67
1.93     YES
 L0002283         0   0.67710E-07  436385.9 3774201.7   411.6     3.70     1.67
1.93     YES
 L0002284         0   0.67710E-07  436385.9 3774205.3   411.7     3.70     1.67
1.93     YES
 L0002285         0   0.67710E-07  436385.8 3774208.9   411.8     3.70     1.67
1.93     YES
 L0002286         0   0.67710E-07  436385.8 3774212.5   411.8     3.70     1.67
1.93     YES
 L0002287         0   0.67710E-07  436385.8 3774216.1   411.9     3.70     1.67
1.93     YES
```

L0002288	0	0.67710E-07	436385.7	3774219.7	412.0	3.70	1.67	1.93 YES
L0002289	0	0.67710E-07	436385.7	3774223.3	412.1	3.70	1.67	1.93 YES
L0002290	0	0.67710E-07	436385.7	3774226.9	412.2	3.70	1.67	1.93 YES
L0002291	0	0.67710E-07	436386.0	3774230.5	412.3	3.70	1.67	1.93 YES
L0002292	0	0.67710E-07	436387.8	3774233.6	412.4	3.70	1.67	1.93 YES
L0002293	0	0.67710E-07	436389.6	3774236.7	412.5	3.70	1.67	1.93 YES
L0002294	0	0.67710E-07	436391.3	3774239.8	412.6	3.70	1.67	1.93 YES
L0002183	0	0.10310E-06	436393.2	3774241.9	412.7	3.70	1.67	1.93 YES
L0002184	0	0.10310E-06	436395.7	3774244.6	412.7	3.70	1.67	1.93 YES
L0002185	0	0.10310E-06	436398.1	3774247.2	412.9	3.70	1.67	1.93 YES
L0002186	0	0.10310E-06	436399.3	3774250.6	413.0	3.70	1.67	1.93 YES
L0002187	0	0.10310E-06	436400.5	3774254.0	413.2	3.70	1.67	1.93 YES
L0002188	0	0.10310E-06	436401.6	3774257.4	413.4	3.70	1.67	1.93 YES
L0002189	0	0.10310E-06	436402.7	3774260.9	413.5	3.70	1.67	1.93 YES
L0002190	0	0.10310E-06	436402.7	3774264.5	413.7	3.70	1.67	1.93 YES
L0002191	0	0.10310E-06	436402.8	3774268.1	413.8	3.70	1.67	1.93 YES
L0002192	0	0.10310E-06	436402.8	3774271.7	414.0	3.70	1.67	1.93 YES
L0002193	0	0.10310E-06	436402.8	3774275.3	414.1	3.70	1.67	1.93 YES
L0002194	0	0.10310E-06	436402.8	3774278.9	414.3	3.70	1.67	1.93 YES
L0002195	0	0.10310E-06	436402.9	3774282.5	414.4	3.70	1.67	1.93 YES
L0002196	0	0.10310E-06	436402.9	3774286.1	414.5	3.70	1.67	1.93 YES
L0002197	0	0.10310E-06	436402.9	3774289.7	414.6	3.70	1.67	1.93 YES
L0002198	0	0.10310E-06	436403.0	3774293.3	414.7	3.70	1.67	1.93 YES
L0002199	0	0.10310E-06	436403.0	3774296.9	414.9	3.70	1.67	1.93 YES

```
 L0002200         0   0.10310E-06  436403.0 3774300.5   415.0     3.70     1.67
1.93     YES
 L0002201         0   0.10310E-06  436403.1 3774304.1   415.1     3.70     1.67
1.93     YES
 L0002202         0   0.10310E-06  436403.1 3774307.7   415.2     3.70     1.67
1.93     YES
 L0002203         0   0.10310E-06  436403.1 3774311.2   415.3     3.70     1.67
1.93     YES
 L0002204         0   0.10310E-06  436403.2 3774314.8   415.4     3.70     1.67
1.93     YES
 L0002205         0   0.10310E-06  436403.2 3774318.4   415.5     3.70     1.67
1.93     YES
 L0002206         0   0.10310E-06  436403.2 3774322.0   415.6     3.70     1.67
1.93     YES
 L0002207         0   0.10310E-06  436403.3 3774325.6   415.8     3.70     1.67
1.93     YES
 L0002208         0   0.10310E-06  436403.3 3774329.2   415.9     3.70     1.67
1.93     YES
```



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                                                    *** VOLUME SOURCE DATA ***

               NUMBER EMISSION RATE                    BASE    RELEASE    INIT.
INIT.   URBAN  EMISSION RATE
   SOURCE       PART.  (GRAMS/SEC)     X        Y      ELEV.   HEIGHT      SY
SZ     SOURCE  SCALAR VARY
     ID         CATS.               (METERS) (METERS) (METERS) (METERS) (METERS)
(METERS)             BY
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 L0002209         0   0.10310E-06  436403.3 3774332.8   416.0     3.70     1.67
1.93     YES
 L0002210         0   0.10310E-06  436403.4 3774336.4   416.1     3.70     1.67
1.93     YES
 L0002211         0   0.10310E-06  436403.4 3774340.0   416.2     3.70     1.67
1.93     YES
 L0002212         0   0.10310E-06  436403.4 3774343.6   416.4     3.70     1.67
1.93     YES
 L0002213         0   0.10310E-06  436403.4 3774347.2   416.6     3.70     1.67
1.93     YES
```

L0002214	0	0.10310E-06	436403.5	3774350.8	416.7	3.70	1.67	1.93 YES
L0002215	0	0.10310E-06	436403.5	3774354.4	416.9	3.70	1.67	1.93 YES
L0002216	0	0.10310E-06	436403.5	3774358.0	417.0	3.70	1.67	1.93 YES
L0002217	0	0.10310E-06	436403.6	3774361.6	417.2	3.70	1.67	1.93 YES
L0002218	0	0.10310E-06	436403.6	3774365.2	417.3	3.70	1.67	1.93 YES
L0002219	0	0.10310E-06	436403.7	3774368.8	417.4	3.70	1.67	1.93 YES
L0002220	0	0.10310E-06	436403.8	3774372.4	417.6	3.70	1.67	1.93 YES
L0002221	0	0.10310E-06	436403.9	3774376.0	417.7	3.70	1.67	1.93 YES
L0002222	0	0.10310E-06	436404.0	3774379.6	417.8	3.70	1.67	1.93 YES
L0002223	0	0.10310E-06	436404.1	3774383.2	417.9	3.70	1.67	1.93 YES
L0002224	0	0.10310E-06	436404.2	3774386.8	418.1	3.70	1.67	1.93 YES
L0002225	0	0.10310E-06	436404.3	3774390.4	418.2	3.70	1.67	1.93 YES
L0002226	0	0.10310E-06	436404.4	3774394.0	418.3	3.70	1.67	1.93 YES
L0002227	0	0.10310E-06	436404.5	3774397.6	418.4	3.70	1.67	1.93 YES
L0002228	0	0.10310E-06	436404.6	3774401.2	418.6	3.70	1.67	1.93 YES
L0002229	0	0.10310E-06	436404.8	3774404.8	418.8	3.70	1.67	1.93 YES
L0002230	0	0.10310E-06	436407.6	3774407.1	419.1	3.70	1.67	1.93 YES
L0002231	0	0.10310E-06	436410.4	3774409.3	419.3	3.70	1.67	1.93 YES
L0002232	0	0.10310E-06	436413.4	3774410.9	419.5	3.70	1.67	1.93 YES
L0002233	0	0.10310E-06	436417.0	3774410.9	419.7	3.70	1.67	1.93 YES
L0002234	0	0.10310E-06	436420.6	3774410.9	419.8	3.70	1.67	1.93 YES
L0002235	0	0.10310E-06	436424.2	3774410.9	420.0	3.70	1.67	1.93 YES
L0002236	0	0.10310E-06	436427.8	3774410.9	420.1	3.70	1.67	1.93 YES
L0002237	0	0.10310E-06	436431.4	3774410.9	420.2	3.70	1.67	1.93 YES

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 L0002238         0   0.10310E-06  436435.0 3774410.9   420.3     3.70     1.67
1.93     YES
 L0002239         0   0.10310E-06  436438.6 3774410.9   420.4     3.70     1.67
1.93     YES
 L0002240         0   0.10310E-06  436442.2 3774410.9   420.6     3.70     1.67
1.93     YES
 L0002241         0   0.10310E-06  436445.8 3774410.9   420.7     3.70     1.67
1.93     YES
 L0002242         0   0.10310E-06  436449.4 3774410.9   420.8     3.70     1.67
1.93     YES
 L0002243         0   0.10310E-06  436453.0 3774410.9   420.9     3.70     1.67
1.93     YES
 L0002244         0   0.10310E-06  436456.6 3774410.9   421.0     3.70     1.67
1.93     YES
 L0002245         0   0.10310E-06  436460.2 3774410.8   421.1     3.70     1.67
1.93     YES
 L0002246         0   0.10310E-06  436463.8 3774410.8   421.2     3.70     1.67
1.93     YES
 L0002247         0   0.10310E-06  436467.4 3774410.7   421.3     3.70     1.67
1.93     YES
 L0002248         0   0.10310E-06  436471.0 3774410.7   421.4     3.70     1.67
1.93     YES
```



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                                                    *** VOLUME SOURCE DATA ***

               NUMBER EMISSION RATE                    BASE    RELEASE    INIT.
INIT.   URBAN  EMISSION RATE
   SOURCE       PART.  (GRAMS/SEC)     X        Y      ELEV.   HEIGHT      SY
SZ     SOURCE  SCALAR VARY
     ID         CATS.               (METERS) (METERS) (METERS) (METERS) (METERS)
(METERS)             BY
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 L0002249         0   0.10310E-06  436474.6 3774410.7   421.5     3.70     1.67
1.93     YES
 L0002250         0   0.10310E-06  436478.2 3774410.6   421.5     3.70     1.67
1.93     YES
 L0002251         0   0.10310E-06  436481.8 3774410.6   421.4     3.70     1.67
1.93     YES
```

L0002252	0	0.10310E-06	436485.4	3774410.6	421.3	3.70	1.67	1.93 YES
L0002253	0	0.10310E-06	436489.0	3774410.5	421.2	3.70	1.67	1.93 YES
L0002254	0	0.10310E-06	436492.6	3774410.5	421.2	3.70	1.67	1.93 YES
L0002255	0	0.10310E-06	436496.2	3774410.4	421.1	3.70	1.67	1.93 YES
L0002256	0	0.10310E-06	436499.8	3774410.4	421.1	3.70	1.67	1.93 YES
L0002257	0	0.10310E-06	436503.4	3774410.4	421.1	3.70	1.67	1.93 YES
L0002258	0	0.10310E-06	436507.0	3774410.5	421.2	3.70	1.67	1.93 YES
L0002259	0	0.10310E-06	436510.6	3774410.5	421.2	3.70	1.67	1.93 YES
L0002260	0	0.10310E-06	436514.2	3774410.5	421.3	3.70	1.67	1.93 YES
L0002261	0	0.10310E-06	436517.8	3774410.6	421.4	3.70	1.67	1.93 YES
L0002262	0	0.10310E-06	436521.4	3774410.6	421.5	3.70	1.67	1.93 YES
L0002263	0	0.10310E-06	436525.0	3774410.7	421.6	3.70	1.67	1.93 YES
L0002264	0	0.10310E-06	436528.6	3774410.7	421.7	3.70	1.67	1.93 YES
L0002265	0	0.10310E-06	436532.2	3774410.8	421.7	3.70	1.67	1.93 YES
L0002266	0	0.10310E-06	436535.8	3774410.8	421.7	3.70	1.67	1.93 YES
L0002267	0	0.10310E-06	436539.4	3774410.9	421.7	3.70	1.67	1.93 YES
L0002268	0	0.10310E-06	436543.0	3774411.0	421.7	3.70	1.67	1.93 YES
L0002269	0	0.10310E-06	436546.6	3774411.2	421.8	3.70	1.67	1.93 YES
L0002270	0	0.10310E-06	436550.2	3774411.4	421.8	3.70	1.67	1.93 YES
L0002271	0	0.10310E-06	436553.8	3774411.6	421.8	3.70	1.67	1.93 YES
L0002272	0	0.10310E-06	436557.4	3774411.9	421.8	3.70	1.67	1.93 YES
L0002273	0	0.10310E-06	436560.6	3774413.1	421.8	3.70	1.67	1.93 YES
L0002274	0	0.10310E-06	436563.6	3774415.1	421.9	3.70	1.67	1.93 YES
L0002275	0	0.10310E-06	436565.2	3774417.8	422.0	3.70	1.67	1.93 YES

```
 L0002276         0   0.10310E-06  436565.2 3774421.4   422.1     3.70     1.67
1.93     YES
 L0002277         0   0.10310E-06  436565.2 3774425.0   422.2     3.70     1.67
1.93     YES
 L0002278         0   0.10310E-06  436565.2 3774428.6   422.4     3.70     1.67
1.93     YES
 L0002279         0   0.10310E-06  436565.2 3774432.2   422.4     3.70     1.67
1.93     YES
 L0002280         0   0.10310E-06  436565.2 3774435.8   422.6     3.70     1.67
1.93     YES
 L0002295         0   0.74210E-07  436579.1 3774439.0   422.7     3.70     1.67
1.93     YES
 L0002296         0   0.74210E-07  436579.1 3774442.6   422.8     3.70     1.67
1.93     YES
 L0002297         0   0.74210E-07  436579.0 3774446.2   422.9     3.70     1.67
1.93     YES
 L0002298         0   0.74210E-07  436579.0 3774449.8   423.0     3.70     1.67
1.93     YES
 L0002299         0   0.74210E-07  436578.9 3774453.4   423.2     3.70     1.67
1.93     YES
 L0002300         0   0.74210E-07  436578.9 3774457.0   423.3     3.70     1.67
1.93     YES
 L0002301         0   0.74210E-07  436578.8 3774460.6   423.3     3.70     1.67
1.93     YES
 L0002302         0   0.74210E-07  436578.8 3774464.2   423.3     3.70     1.67
1.93     YES
```



```
                                                    *** VOLUME SOURCE DATA ***

               NUMBER EMISSION RATE                    BASE    RELEASE    INIT.
INIT.   URBAN  EMISSION RATE
   SOURCE       PART.  (GRAMS/SEC)     X        Y      ELEV.   HEIGHT      SY
SZ     SOURCE  SCALAR VARY
     ID         CATS.               (METERS) (METERS) (METERS) (METERS) (METERS)
(METERS)             BY
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- - - - - - - - - - - - - - - - - - - - -

 L0002303         0   0.74210E-07  436578.7 3774467.8   423.4     3.70     1.67
1.93     YES
```

```
 L0002304         0   0.74210E-07  436578.7 3774471.4   423.4     3.70     1.67
1.93     YES
 L0002305         0   0.74210E-07  436578.6 3774475.0   423.4     3.70     1.67
1.93     YES
 L0002306         0   0.74210E-07  436578.6 3774478.6   423.4     3.70     1.67
1.93     YES
 L0002307         0   0.74210E-07  436578.6 3774482.2   423.5     3.70     1.67
1.93     YES
 L0002308         0   0.74210E-07  436578.5 3774485.8   423.5     3.70     1.67
1.93     YES
 L0002309         0   0.74210E-07  436578.5 3774489.4   423.5     3.70     1.67
1.93     YES
 L0002310         0   0.74210E-07  436578.4 3774493.0   423.6     3.70     1.67
1.93     YES
 L0002311         0   0.74210E-07  436578.4 3774496.6   423.8     3.70     1.67
1.93     YES
 L0002312         0   0.74210E-07  436578.3 3774500.2   423.9     3.70     1.67
1.93     YES
 L0002313         0   0.74210E-07  436578.3 3774503.8   424.0     3.70     1.67
1.93     YES
 *** AERMOD - VERSION  19191 ***   *** C:\Lakes\AERMOD View\Bridge Upland\Bridge
Upland.isc                 ***       01/15/20
 *** AERMET - VERSION  16216 ***   ***
                         ***       13:48:55

                                   PAGE  22
 *** MODELOPTs:    RegDFAULT  CONC  ELEV  URBAN  ADJ_U*


                                        *** SOURCE IDs DEFINING SOURCE GROUPS
***

 SRCGROUP ID                                          SOURCE IDs
 -----------                                          ----------


  ALL        L0001543    , L0001544    , L0001545    , L0001546    , L0001547    ,
L0001548    , L0001549    , L0001550    ,

             L0001551    , L0001552    , L0001553    , L0001554    , L0001555    ,
L0001556    , L0001557    , L0001558    ,

             L0001559    , L0001560    , L0001561    , L0001562    , L0001563    ,
L0001564    , L0001565    , L0001566    ,

             L0001567    , L0001568    , L0001569    , L0001570    , L0001571    ,
L0001572    , L0001573    , L0001574    ,
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L0001575 , L0001576 , L0001577 , L0001578 , L0001579 ,
L0001580 , L0001581 , L0001582 ,

L0001583 , L0001584 , L0001585 , L0001586 , L0001587 ,
L0001588 , L0001589 , L0001590 ,

L0001591 , L0001592 , L0001593 , L0001594 , L0001595 ,
L0001596 , L0001597 , L0001598 ,

L0001599 , L0001600 , L0001601 , L0001602 , L0001603 ,
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*** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

*** SOURCE IDs DEFINING SOURCE GROUPS ***

SRCGROUP ID	SOURCE IDs
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	L0001719 , L0001720 , L0001721 , L0001722 , L0001723 , L0001724 , L0001725 , L0001726 ,
	L0001727 , L0001728 , L0001729 , L0001730 , L0001731 , L0001732 , L0001733 , L0001734 ,
	L0001735 , L0001736 , L0001737 , L0001738 , L0001739 , L0001740 , L0001741 , L0001742 ,
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*** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

*** SOURCE IDs DEFINING SOURCE GROUPS ***

SRCGROUP ID	SOURCE IDs

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L0002015 , L0002016 , L0002017 , L0002018 , L0002019 , L0002020 , L0002021 , L0002022 ,

*** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

*** SOURCE IDs DEFINING SOURCE GROUPS ***

SRCGROUP ID	SOURCE IDs

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L0002167 , L0002168 , L0002169 , L0002170 , L0002171 , L0002172 , L0002173 , L0002174 ,

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*** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

*** SOURCE IDs DEFINING SOURCE GROUPS ***

SRCGROUP ID	SOURCE IDs

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L0002311 , L0002312 , L0002313 ,
↟ *** AERMOD - VERSION 19191 *** *** C:\Lakes\AERMOD View\Bridge Upland\Bridge Upland.isc *** 01/15/20
*** AERMET - VERSION 16216 *** ***
*** 13:48:55

*** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

*** SOURCE IDs DEFINED AS URBAN SOURCES ***

URBAN ID	URBAN POP	SOURCE IDs
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		L0001575 , L0001576 , L0001577 , L0001578 , L0001579 , L0001580 , L0001581 , L0001582 ,
		L0001583 , L0001584 , L0001585 , L0001586 , L0001587 , L0001588 , L0001589 , L0001590 ,
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		L0001599 , L0001600 , L0001601 , L0001602 , L0001603 , L0001604 , L0001605 , L0001606 ,
		L0001607 , L0001608 , L0001609 , L0001610 , L0001611 , L0001612 , L0001613 , L0001614 ,
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*** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

*** SOURCE IDs DEFINED AS URBAN SOURCES ***

URBAN ID	URBAN POP	SOURCE IDs

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*** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

*** SOURCE IDs DEFINED AS URBAN SOURCES ***

URBAN ID	URBAN POP	SOURCE IDs

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L0002020    , L0002021    , L0002022    ,
↑ *** AERMOD - VERSION  19191 ***   *** C:\Lakes\AERMOD View\Bridge Upland\Bridge
Upland.isc                  ***        01/15/20
 *** AERMET - VERSION  16216 ***   ***
                         ***        13:48:55

                                   PAGE  30
 *** MODELOPTs:    RegDFAULT  CONC  ELEV  URBAN  ADJ_U*


                                          *** SOURCE IDs DEFINED AS URBAN SOURCES
***

  URBAN ID   URBAN POP                                    SOURCE IDs
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*** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

*** SOURCE IDs DEFINED AS URBAN SOURCES ***

URBAN ID	URBAN POP	SOURCE IDs

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*** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

*** GRIDDED RECEPTOR NETWORK SUMMARY ***

*** NETWORK ID: UCART1 ; NETWORK TYPE: GRIDCART ***

*** X-COORDINATES OF GRID ***
(METERS)

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437293.8, 437306.4, 437319.1,
       437331.8, 437344.4, 437357.1, 437369.8, 437382.4, 437395.1, 437407.8,
437420.5, 437433.1, 437445.8,
       437458.5,

*** Y-COORDINATES OF GRID ***
(METERS)

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3773629.3, 3773658.6, 3773687.9,
      3773717.2, 3773746.5, 3773775.8, 3773805.1, 3773834.4, 3773863.7, 3773893.0,
3773922.3, 3773951.6, 3773980.9,
      3774010.2,

 *** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

*** NETWORK ID: UCART1   ; NETWORK TYPE:
GRIDCART ***

* ELEVATION HEIGHTS IN METERS *

| Y-COORD (METERS) | X-COORD (METERS) | | |

3773775.77	399.40	399.50	399.50	399.60	399.70
399.70	399.70	399.70	399.60		
3773746.47	398.40	398.60	398.80	399.00	399.20
399.30	399.20	399.20	399.20		
3773717.17	397.60	397.90	398.20	398.50	398.70
398.90	399.00	399.10	399.10		
3773687.87	396.70	396.80	397.00	397.10	397.20
397.40	397.60	397.80	398.20		
3773658.57	395.70	395.90	396.00	396.00	396.10
396.10	396.20	396.30	396.50		
3773629.27	394.90	395.10	395.20	395.30	395.20
395.20	395.20	395.30	395.30		
3773599.97	393.80	393.90	394.00	394.10	394.00
394.00	393.90	393.90	393.90		
3773570.67	392.80	392.90	393.00	393.00	393.00
392.90	392.80	392.80	392.80		
3773541.37	391.90	392.00	392.10	392.10	392.10
392.00	392.00	391.90	391.90		
3773512.07	391.00	391.10	391.20	391.30	391.20
391.20	391.10	391.00	391.00		
3773482.77	390.10	390.20	390.40	390.40	390.40
390.30	390.30	390.20	390.10		
3773453.47	389.30	389.40	389.50	389.50	389.50
389.50	389.40	389.30	389.30		
3773424.17	388.40	388.40	388.50	388.50	388.50
388.50	388.40	388.40	388.40		

*** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

*** NETWORK ID: UCART1 ; NETWORK TYPE: GRIDCART ***

* ELEVATION HEIGHTS IN METERS *

Y-COORD (METERS)	X-COORD (METERS)				
	437319.09	437331.76	437344.43	437357.10	437369.77
437382.44	437395.11	437407.78	437420.45		

3774010.17	408.40	408.60	408.80	409.00	409.10
409.10	409.10	409.00	408.90		
3773980.87	406.40	406.30	406.30	406.40	406.40

406.30 406.20 406.20 406.10
3773951.57 | 405.30 405.10 404.90 405.00 405.00
404.90 404.80 404.70 404.60
3773922.27 | 404.30 404.00 403.70 403.80 403.80
403.70 403.60 403.60 403.50
3773892.97 | 403.10 402.90 402.70 402.80 402.90
402.80 402.60 402.60 402.60
3773863.67 | 401.90 401.80 401.70 401.80 402.00
401.90 401.80 401.90 401.90
3773834.37 | 401.20 401.10 401.10 401.20 401.30
401.30 401.30 401.20 401.20
3773805.07 | 400.50 400.50 400.40 400.40 400.40
400.40 400.30 400.30 400.30
3773775.77 | 399.60 399.60 399.60 399.60 399.60
399.60 399.50 399.50 399.50
3773746.47 | 399.20 399.10 399.00 398.80 398.60
398.50 398.40 398.40 398.40
3773717.17 | 399.10 399.00 398.80 398.20 397.60
397.40 397.20 397.20 397.30
3773687.87 | 398.50 398.50 398.40 397.60 396.80
396.50 396.30 396.30 396.20
3773658.57 | 396.80 396.80 396.70 396.20 395.70
395.50 395.30 395.30 395.30
3773629.27 | 395.30 395.30 395.30 395.00 394.70
394.60 394.40 394.40 394.40
3773599.97 | 393.90 394.00 393.90 393.80 393.70
393.60 393.50 393.60 393.60
3773570.67 | 392.80 392.80 392.80 392.80 392.70
392.70 392.70 392.70 392.70
3773541.37 | 391.90 391.90 391.90 391.90 391.80
391.80 391.80 391.80 391.80
3773512.07 | 391.00 390.90 390.90 391.00 391.00
390.90 390.90 390.90 390.90
3773482.77 | 390.10 390.10 390.00 390.10 390.10
390.10 390.10 390.10 390.10
3773453.47 | 389.20 389.20 389.20 389.20 389.20
389.20 389.30 389.30 389.30
3773424.17 | 388.40 388.40 388.40 388.40 388.40
388.50 388.50 388.50 388.50

*** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

*** NETWORK ID: UCART1 ; NETWORK TYPE:

GRIDCART ***

* ELEVATION HEIGHTS IN METERS *

Y-COORD (METERS)	X-COORD (METERS)		
	437433.12	437445.79	437458.46
3774010.17	408.80	408.70	408.70
3773980.87	406.10	406.00	406.00
3773951.57	404.60	404.50	404.70
3773922.27	403.50	403.40	403.70
3773892.97	402.60	402.50	402.80
3773863.67	401.80	401.70	401.90
3773834.37	401.10	400.90	401.00
3773805.07	400.20	400.10	400.10
3773775.77	399.50	399.50	399.40
3773746.47	398.40	398.40	398.10
3773717.17	397.20	397.20	397.00
3773687.87	396.20	396.20	396.10
3773658.57	395.30	395.30	395.30
3773629.27	394.40	394.40	394.50
3773599.97	393.60	393.50	393.60
3773570.67	392.70	392.70	392.80
3773541.37	391.80	391.80	392.00
3773512.07	390.90	391.00	391.20
3773482.77	390.10	390.10	390.40
3773453.47	389.30	389.30	389.50
3773424.17	388.50	388.50	388.60

*** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

*** NETWORK ID: UCART1 ; NETWORK TYPE: GRIDCART ***

* HILL HEIGHT SCALES IN METERS *

Y-COORD (METERS)	X-COORD (METERS)							
	437205.06	437217.73	437230.40	437243.07	437255.74	437268.41	437281.08	437293.75	437306.42

3774010.17 | 406.40 406.50 406.70 406.90 407.10
407.40 407.70 407.90 408.20
3773980.87 | 405.60 405.70 405.90 406.00 406.10
406.20 406.30 406.40 406.40
3773951.57 | 404.80 405.00 405.00 405.10 405.20
405.20 405.30 405.30 405.30
3773922.27 | 403.90 404.00 404.00 404.00 403.90
403.90 404.00 404.10 404.20
3773892.97 | 402.90 402.90 403.00 403.00 402.90
402.90 402.90 403.00 403.10
3773863.67 | 402.10 402.20 402.20 402.20 402.10
402.10 402.00 402.00 401.90
3773834.37 | 401.30 401.50 401.50 401.40 401.40
401.30 401.30 401.30 401.30
3773805.07 | 400.30 400.40 400.50 400.60 400.60
400.60 400.60 400.50 400.50
3773775.77 | 399.40 399.50 399.50 399.60 399.70
399.70 399.70 399.70 399.60
3773746.47 | 398.40 398.60 398.80 399.00 399.20
399.30 399.20 399.20 399.20
3773717.17 | 397.60 397.90 398.20 398.50 398.70
398.90 399.00 399.10 399.10
3773687.87 | 396.70 396.80 397.00 397.10 397.20
397.40 397.60 397.80 398.20
3773658.57 | 395.70 395.90 396.00 396.00 396.10
396.10 396.20 396.30 396.50
3773629.27 | 394.90 395.10 395.20 395.30 395.20
395.20 395.20 395.30 395.30
3773599.97 | 393.80 393.90 394.00 394.10 394.00
394.00 393.90 393.90 393.90
3773570.67 | 392.80 392.90 393.00 393.00 393.00
392.90 392.80 392.80 392.80
3773541.37 | 391.90 392.00 392.10 392.10 392.10
392.00 392.00 391.90 391.90
3773512.07 | 391.00 391.10 391.20 391.30 391.20
391.20 391.10 391.00 391.00
3773482.77 | 390.10 390.20 390.40 390.40 390.40
390.30 390.30 390.20 390.10
3773453.47 | 389.30 389.40 389.50 389.50 389.50
389.50 389.40 389.30 389.30
3773424.17 | 388.40 388.40 388.50 388.50 388.50
388.50 388.40 388.40 388.40

*** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

*** NETWORK ID: UCART1 ; NETWORK TYPE: GRIDCART ***

* HILL HEIGHT SCALES IN METERS *

Y-COORD (METERS)	X-COORD (METERS)									
	437319.09	437331.76	437344.43	437357.10	437369.77	437382.44	437395.11	437407.78	437420.45	
3774010.17	408.40	408.60	410.00	409.00	410.40	409.10	410.40	409.00	410.20	
3773980.87	406.40	406.30	406.30	406.40	406.40	406.30	410.40	406.20	410.20	
3773951.57	405.30	405.10	404.90	405.00	405.00	404.90	404.80	404.70	404.60	
3773922.27	404.30	404.00	403.70	403.80	403.80	403.70	403.60	403.60	403.50	
3773892.97	403.10	402.90	402.70	402.80	402.90	402.80	402.60	402.60	402.60	
3773863.67	401.90	401.80	401.70	401.80	402.00	401.90	401.80	401.90	401.90	
3773834.37	401.20	401.10	401.10	401.20	401.30	401.30	401.30	401.20	401.20	
3773805.07	400.50	400.50	400.40	400.40	400.40	400.40	400.30	400.30	400.30	
3773775.77	399.60	399.60	399.60	399.60	399.60	399.60	399.50	399.50	399.50	
3773746.47	399.20	399.10	399.00	398.80	398.60	398.50	398.40	398.40	398.40	
3773717.17	399.10	399.00	398.80	398.20	397.60	397.40	397.20	397.20	397.30	
3773687.87	398.50	398.50	398.40	397.60	396.80	396.50	396.30	396.30	396.20	
3773658.57	396.80	396.80	396.70	396.20	395.70	395.50	395.30	395.30	395.30	
3773629.27	395.30	395.30	395.30	395.00	394.70	394.60	394.40	394.40	394.40	
3773599.97	393.90	394.00	393.90	393.80	393.70	393.60	393.50	393.60	393.60	
3773570.67	392.80	392.80	392.80	392.80	392.70	392.70	392.70	392.70	392.70	
3773541.37	391.90	391.90	391.90	391.90	391.80	391.80	391.80	391.80	391.80	

3773512.07	391.00	390.90	390.90	391.00	391.00
390.90	390.90	390.90	390.90		
3773482.77	390.10	390.10	390.00	390.10	390.10
390.10	390.10	390.10	390.10		
3773453.47	389.20	389.20	389.20	389.20	389.20
389.20	389.30	389.30	389.30		
3773424.17	388.40	388.40	388.40	388.40	388.40
388.50	388.50	388.50	388.50		

*** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

*** NETWORK ID: UCART1 ; NETWORK TYPE: GRIDCART ***

* HILL HEIGHT SCALES IN METERS *

Y-COORD (METERS)	X-COORD (METERS)		
	437433.12	437445.79	437458.46
3774010.17	408.80	410.00	408.70
3773980.87	406.10	406.00	406.00
3773951.57	404.60	404.50	404.70
3773922.27	403.50	403.40	403.70
3773892.97	402.60	402.50	402.80
3773863.67	401.80	401.70	401.90
3773834.37	401.10	400.90	401.00
3773805.07	400.20	400.10	400.10
3773775.77	399.50	399.50	399.40
3773746.47	398.40	398.40	398.10
3773717.17	397.20	397.20	397.00
3773687.87	396.20	396.20	396.10
3773658.57	395.30	395.30	395.30
3773629.27	394.40	394.40	394.50
3773599.97	393.60	393.50	393.60
3773570.67	392.70	392.70	392.80
3773541.37	391.80	391.80	392.00
3773512.07	390.90	391.00	391.20
3773482.77	390.10	390.10	390.40
3773453.47	389.30	389.30	389.50
3773424.17	388.50	388.50	388.60

*** GRIDDED RECEPTOR NETWORK SUMMARY ***

*** NETWORK ID: UCART2 ; NETWORK TYPE: GRIDCART ***

*** X-COORDINATES OF GRID ***
(METERS)

437339.0, 437349.4, 437359.8, 437370.3, 437380.7, 437391.1, 437401.5, 437411.9, 437422.4, 437432.8,
437443.2, 437453.6, 437464.0, 437474.5, 437484.9, 437495.3, 437505.7, 437516.1, 437526.6, 437537.0,
437547.4,

*** Y-COORDINATES OF GRID ***
(METERS)

3774234.1, 3774252.9, 3774271.7, 3774290.4, 3774309.2, 3774328.0, 3774346.7, 3774365.5, 3774384.3, 3774403.1,
3774421.8, 3774440.6, 3774459.4, 3774478.1, 3774496.9, 3774515.7, 3774534.4, 3774553.2, 3774572.0, 3774590.8,
3774609.5,

*** NETWORK ID: UCART2 ; NETWORK TYPE: GRIDCART ***

* ELEVATION HEIGHTS IN METERS *

Y-COORD (METERS)	X-COORD (METERS)								
	437338.99	437349.41	437359.83	437370.25	437380.67	437391.09	437401.51	437411.93	437422.35

3774609.52	426.30	426.30	426.30	426.40	426.40
426.40	426.40	426.40	426.40		
3774590.75	425.60	425.60	425.70	425.70	425.70
425.60	425.60	425.60	425.60		
3774571.98	424.90	425.00	425.00	425.00	425.00
424.90	424.90	424.80	424.80		
3774553.21	424.30	424.40	424.40	424.40	424.40
424.30	424.30	424.20	424.20		
3774534.44	423.80	423.80	423.80	423.80	423.80
423.70	423.70	423.70	423.60		
3774515.67	423.20	423.30	423.30	423.20	423.20
423.20	423.20	423.10	423.10		
3774496.90	422.60	422.70	422.70	422.60	422.60
422.60	422.60	422.50	422.50		
3774478.13	422.00	422.10	422.10	422.00	422.00
422.00	421.90	421.90	421.90		
3774459.36	421.50	421.60	421.50	421.50	421.40
421.40	421.30	421.30	421.30		
3774440.59	421.00	421.10	421.00	420.90	420.90
420.80	420.80	420.70	420.70		
3774421.82	420.50	420.60	420.50	420.40	420.30
420.20	420.20	420.10	420.10		
3774403.05	419.70	419.80	419.70	419.70	419.60
419.40	419.30	419.30	419.20		
3774384.28	419.10	419.10	419.10	419.10	418.90
418.80	418.60	418.60	418.50		
3774365.51	418.50	418.60	418.60	418.60	418.50
418.40	418.30	418.30	418.20		
3774346.74	418.00	418.10	418.10	418.10	418.00
417.90	417.80	417.80	417.70		
3774327.97	417.50	417.70	417.60	417.60	417.50
417.30	417.20	417.20	417.20		
3774309.20	416.70	416.80	416.80	416.80	416.80
416.70	416.70	416.70	416.70		
3774290.43	415.70	415.80	415.90	416.00	416.00
416.10	416.10	416.20	416.20		
3774271.66	414.60	414.70	414.90	415.00	415.20
415.40	415.50	415.50	415.60		
3774252.89	413.90	414.00	414.10	414.30	414.50
414.60	414.80	414.90	414.90		
3774234.12	413.40	413.40	413.50	413.60	413.80
413.90	414.10	414.20	414.30		

*** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

*** NETWORK ID: UCART2 ; NETWORK TYPE: GRIDCART ***

* ELEVATION HEIGHTS IN METERS *

Y-COORD (METERS)	X-COORD (METERS)									
	437432.77	437443.19	437453.61	437464.03	437474.45	437484.87	437495.29	437505.71	437516.13	
3774609.52	426.50	426.50	426.60	426.70	426.80	426.80	426.70	426.70	426.70	
3774590.75	425.70	425.80	425.90	425.90	426.00	425.90	425.90	425.90	425.90	
3774571.98	424.90	425.00	425.10	425.20	425.20	425.20	425.10	425.10	425.20	
3774553.21	424.20	424.30	424.30	424.30	424.30	424.30	424.40	424.40	424.50	
3774534.44	423.60	423.60	423.60	423.60	423.60	423.70	423.70	423.80	423.80	
3774515.67	423.10	423.10	423.00	423.00	423.00	423.10	423.10	423.20	423.20	
3774496.90	422.50	422.40	422.40	422.40	422.40	422.40	422.40	422.50	422.50	
3774478.13	421.80	421.80	421.80	421.70	421.70	421.70	421.70	421.70	421.80	
3774459.36	421.20	421.20	421.10	421.10	421.10	421.10	421.10	421.10	421.20	
3774440.59	420.60	420.60	420.60	420.50	420.50	420.50	420.50	420.50	420.50	
3774421.82	420.10	420.00	420.00	420.00	419.90	419.90	419.90	419.90	419.90	
3774403.05	419.20	419.10	419.10	419.10	419.10	419.10	419.10	419.10	419.10	
3774384.28	418.50	418.40	418.40	418.40	418.40	418.40	418.40	418.40	418.40	
3774365.51	418.10	418.00	418.00	418.00	417.90	417.90	417.90	418.00	418.00	
3774346.74	417.60	417.50	417.50	417.40	417.40	417.40	417.40	417.50	417.50	
3774327.97	417.10	417.00	416.90	416.90	416.80	416.80	416.90	416.90	417.00	
3774309.20	416.60	416.50	416.50	416.40	416.40	416.40	416.40	416.40	416.50	
3774290.43	416.10	416.00	415.90	415.90	415.90					

```
   415.90       415.90       415.90       415.90
  3774271.66 |        415.50       415.40       415.40       415.30       415.30
   415.30       415.30       415.30       415.30
  3774252.89 |        414.90       414.80       414.80       414.70       414.70
   414.70       414.70       414.70       414.70
  3774234.12 |        414.30       414.20       414.20       414.10       414.10
   414.10       414.00       414.10       414.10
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 *** MODELOPTs:    RegDFAULT  CONC  ELEV  URBAN  ADJ_U*

                                  *** NETWORK ID: UCART2   ;  NETWORK TYPE:
GRIDCART ***

                                                  * ELEVATION HEIGHTS IN METERS *

    Y-COORD  |                                                  X-COORD (METERS)
    (METERS) |     437526.55    437536.97    437547.39
 - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
- - - - - - - - - - - - - - - - - - - - - - - - - - - -

  3774609.52 |        426.70       426.70       426.80
  3774590.75 |        426.00       426.00       426.10
  3774571.98 |        425.20       425.30       425.30
  3774553.21 |        424.50       424.60       424.60
  3774534.44 |        423.90       423.90       424.00
  3774515.67 |        423.30       423.30       423.40
  3774496.90 |        422.60       422.70       422.70
  3774478.13 |        421.90       422.00       422.10
  3774459.36 |        421.20       421.40       421.60
  3774440.59 |        420.60       420.80       421.00
  3774421.82 |        419.90       420.20       420.40
  3774403.05 |        419.10       419.40       419.70
  3774384.28 |        418.40       418.70       419.00
  3774365.51 |        418.00       418.20       418.40
  3774346.74 |        417.60       417.70       417.80
  3774327.97 |        417.00       417.10       417.30
  3774309.20 |        416.50       416.50       416.50
  3774290.43 |        415.90       415.90       415.80
  3774271.66 |        415.30       415.20       415.10
  3774252.89 |        414.70       414.60       414.50
  3774234.12 |        414.10       414.00       413.90
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*** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

                                *** NETWORK ID: UCART2   ; NETWORK TYPE:
GRIDCART ***

                                                * HILL HEIGHT SCALES IN METERS *

    Y-COORD | X-COORD (METERS)
    (METERS) | 437338.99   437349.41   437359.83   437370.25   437380.67
437391.09   437401.51   437411.93   437422.35
 -
- -

  3774609.52 | 426.30   426.30   426.30   426.40   426.40
   426.40   426.40   426.40   426.40
  3774590.75 | 425.60   425.60   425.70   425.70   425.70
   425.60   425.60   425.60   425.60
  3774571.98 | 424.90   425.00   425.00   425.00   425.00
   424.90   424.90   424.80   424.80
  3774553.21 | 424.30   424.40   424.40   424.40   424.40
   424.30   424.30   424.20   424.20
  3774534.44 | 423.80   423.80   423.80   423.80   423.80
   423.70   423.70   423.70   423.60
  3774515.67 | 423.20   423.30   423.30   423.20   423.20
   423.20   423.20   423.10   423.10
  3774496.90 | 422.60   422.70   422.70   422.60   422.60
   422.60   422.60   422.50   422.50
  3774478.13 | 422.00   422.10   422.10   422.00   422.00
   422.00   421.90   421.90   421.90
  3774459.36 | 421.50   421.60   421.50   421.50   421.40
   421.40   421.30   421.30   421.30
  3774440.59 | 421.00   421.10   421.00   420.90   420.90
   420.80   420.80   420.70   420.70
  3774421.82 | 420.50   420.60   420.50   420.40   420.30
   420.20   420.20   420.10   420.10
  3774403.05 | 419.70   419.80   419.70   419.70   419.60
   419.40   419.30   419.30   419.20
  3774384.28 | 419.10   419.10   419.10   419.10   418.90
   418.80   418.60   418.60   418.50
  3774365.51 | 418.50   418.60   418.60   418.60   418.50
   418.40   418.30   418.30   418.20
  3774346.74 | 418.00   418.10   418.10   418.10   418.00
   417.90   417.80   417.80   417.70
  3774327.97 | 417.50   417.70   417.60   417.60   417.50

```
   417.30       417.20       417.20       417.20
  3774309.20 |       416.70       416.80       416.80       416.80       416.80
   416.70       416.70       416.70       416.70
  3774290.43 |       415.70       415.80       415.90       416.00       416.00
   416.10       416.10       416.20       416.20
  3774271.66 |       414.60       414.70       414.90       415.00       415.20
   415.40       415.50       415.50       415.60
  3774252.89 |       413.90       414.00       414.10       414.30       414.50
   414.60       414.80       414.90       414.90
  3774234.12 |       413.40       413.40       413.50       413.60       413.80
   413.90       414.10       414.20       414.30
♠ *** AERMOD - VERSION  19191 ***   *** C:\Lakes\AERMOD View\Bridge Upland\Bridge
Upland.isc                  ***        01/15/20
 *** AERMET - VERSION  16216 ***   ***
                        ***        13:48:55

                                   PAGE  44
 *** MODELOPTs:    RegDFAULT  CONC  ELEV  URBAN  ADJ_U*

                                  *** NETWORK ID: UCART2   ;  NETWORK TYPE:
GRIDCART ***

                                                * HILL HEIGHT SCALES IN METERS *

    Y-COORD  |                                                 X-COORD (METERS)
    (METERS) |     437432.77    437443.19    437453.61    437464.03    437474.45
437484.87    437495.29    437505.71    437516.13
 - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
- - - - - - - - - - - - - - - - - - - - - - - - - - - - - -

  3774609.52 |       426.50       426.50       426.60       426.70       426.80
   426.80       426.70       426.70       426.70
  3774590.75 |       425.70       425.80       425.90       425.90       426.00
   425.90       425.90       425.90       425.90
  3774571.98 |       424.90       425.00       425.10       425.20       425.20
   425.20       425.10       425.10       425.20
  3774553.21 |       424.20       424.30       424.30       424.30       424.30
   424.30       424.40       424.40       424.50
  3774534.44 |       423.60       423.60       423.60       423.60       423.60
   423.70       423.70       423.80       423.80
  3774515.67 |       423.10       423.10       423.00       423.00       423.00
   423.10       423.10       423.20       423.20
  3774496.90 |       422.50       422.40       422.40       422.40       422.40
   422.40       422.40       422.50       422.50
  3774478.13 |       421.80       421.80       421.80       421.70       421.70
   421.70       421.70       421.70       421.80
  3774459.36 |       421.20       421.20       421.10       421.10       421.10
   421.10       421.10       421.10       421.20
```

3774440.59	420.60	420.60	420.60	420.50	420.50
420.50	420.50	420.50	420.50		
3774421.82	420.10	420.00	420.00	420.00	419.90
419.90	419.90	419.90	419.90		
3774403.05	419.20	419.10	419.10	419.10	419.10
419.10	419.10	419.10	419.10		
3774384.28	418.50	418.40	418.40	418.40	418.40
418.40	418.40	418.40	418.40		
3774365.51	418.10	418.00	418.00	418.00	417.90
417.90	417.90	418.00	418.00		
3774346.74	417.60	417.50	417.50	417.40	417.40
417.40	417.40	417.50	417.50		
3774327.97	417.10	417.00	416.90	416.90	416.80
416.80	416.90	416.90	417.00		
3774309.20	416.60	416.50	416.50	416.40	416.40
416.40	416.40	416.40	416.50		
3774290.43	416.10	416.00	415.90	415.90	415.90
415.90	415.90	415.90	415.90		
3774271.66	415.50	415.40	415.40	415.30	415.30
415.30	415.30	415.30	415.30		
3774252.89	414.90	414.80	414.80	414.70	414.70
414.70	414.70	414.70	414.70		
3774234.12	414.30	414.20	414.20	414.10	414.10
414.10	414.00	414.10	414.10		

*** NETWORK ID: UCART2 ; NETWORK TYPE: GRIDCART ***

* HILL HEIGHT SCALES IN METERS *

Y-COORD (METERS)	X-COORD (METERS) 437526.55	437536.97	437547.39
3774609.52	426.70	426.70	426.80
3774590.75	426.00	426.00	426.10
3774571.98	425.20	425.30	425.30
3774553.21	424.50	424.60	424.60
3774534.44	423.90	423.90	424.00
3774515.67	423.30	423.30	423.40

3774496.90	422.60	422.70	422.70
3774478.13	421.90	422.00	422.10
3774459.36	421.20	421.40	421.60
3774440.59	420.60	420.80	421.00
3774421.82	419.90	420.20	420.40
3774403.05	419.10	419.40	419.70
3774384.28	418.40	418.70	419.00
3774365.51	418.00	418.20	418.40
3774346.74	417.60	417.70	417.80
3774327.97	417.00	417.10	417.30
3774309.20	416.50	416.50	416.50
3774290.43	415.90	415.90	415.80
3774271.66	415.30	415.20	415.10
3774252.89	414.70	414.60	414.50
3774234.12	414.10	414.00	413.90

*** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

*** DISCRETE CARTESIAN RECEPTORS ***
(X-COORD, Y-COORD, ZELEV, ZHILL, ZFLAG)
(METERS)

(436490.8, 3772888.6, 370.5, 370.5, 0.0); (436520.8, 3772888.6, 370.6, 370.6, 0.0);
(436550.8, 3772888.6, 370.6, 370.6, 0.0); (436610.8, 3772888.6, 371.0, 371.0, 0.0);
(436640.8, 3772888.6, 371.4, 371.4, 0.0); (436670.8, 3772888.6, 372.0, 372.0, 0.0);
(436700.8, 3772888.6, 372.4, 372.4, 0.0); (436490.8, 3772918.6, 371.5, 371.5, 0.0);
(436520.8, 3772918.6, 371.6, 371.6, 0.0); (436550.8, 3772918.6, 371.6, 371.6, 0.0);
(436610.8, 3772918.6, 371.9, 371.9, 0.0); (436640.8, 3772918.6, 372.0, 372.0, 0.0);
(436670.8, 3772918.6, 372.4, 372.4, 0.0); (436700.8, 3772918.6, 373.0, 373.0, 0.0);
(436610.8, 3772948.6, 372.8, 372.8, 0.0); (436640.8, 3772948.6, 372.8, 372.8, 0.0);
(436670.8, 3772948.6, 373.0, 373.0, 0.0); (436700.8, 3772948.6, 373.4, 373.4, 0.0);
(436550.8, 3772978.6, 373.2, 373.2, 0.0); (436580.8, 3772978.6, 373.4, 373.4, 0.0);
(436610.8, 3772978.6, 373.7, 373.7, 0.0); (436640.8,

```
3772978.6,     373.7,     373.7,       0.0);
     ( 436670.8, 3772978.6,     373.6,     373.6,       0.0);         ( 436700.8,
3772978.6,     374.1,     374.1,       0.0);
     ( 436550.8, 3773008.6,     374.0,     374.0,       0.0);         ( 436580.8,
3773008.6,     374.2,     374.2,       0.0);
     ( 436610.8, 3773008.6,     374.4,     374.4,       0.0);         ( 436640.8,
3773008.6,     374.6,     374.6,       0.0);
     ( 436670.8, 3773008.6,     374.6,     374.6,       0.0);         ( 436700.8,
3773008.6,     374.9,     374.9,       0.0);
     ( 436610.8, 3773038.6,     375.3,     375.3,       0.0);         ( 436640.8,
3773038.6,     375.5,     375.5,       0.0);
     ( 436670.8, 3773038.6,     375.7,     375.7,       0.0);         ( 436700.8,
3773038.6,     375.9,     375.9,       0.0);
     ( 436610.8, 3773068.6,     376.2,     376.2,       0.0);         ( 436640.8,
3773068.6,     376.4,     376.4,       0.0);
     ( 436670.8, 3773068.6,     376.4,     376.4,       0.0);         ( 436700.8,
3773068.6,     376.7,     376.7,       0.0);
     ( 436100.8, 3773098.6,     375.0,     375.0,       0.0);         ( 436130.8,
3773098.6,     375.3,     375.3,       0.0);
     ( 436160.8, 3773098.6,     375.6,     375.6,       0.0);         ( 436190.8,
3773098.6,     376.2,     376.2,       0.0);
     ( 436220.8, 3773098.6,     376.2,     376.2,       0.0);         ( 436610.8,
3773098.6,     377.1,     377.1,       0.0);
     ( 436640.8, 3773098.6,     377.2,     377.2,       0.0);         ( 436670.8,
3773098.6,     377.3,     377.3,       0.0);
     ( 436700.8, 3773098.6,     377.5,     377.5,       0.0);         ( 436100.8,
3773128.6,     375.5,     375.5,       0.0);
     ( 436130.8, 3773128.6,     375.7,     375.7,       0.0);         ( 436160.8,
3773128.6,     376.1,     376.1,       0.0);
     ( 436190.8, 3773128.6,     377.2,     377.2,       0.0);         ( 436220.8,
3773128.6,     377.0,     377.0,       0.0);
     ( 436250.8, 3773128.6,     376.8,     376.8,       0.0);         ( 436100.8,
3773158.6,     376.0,     376.0,       0.0);
     ( 436130.8, 3773158.6,     376.2,     376.2,       0.0);         ( 436160.8,
3773158.6,     376.5,     376.5,       0.0);
     ( 436190.8, 3773158.6,     377.5,     377.5,       0.0);         ( 436220.8,
3773158.6,     377.4,     377.4,       0.0);
     ( 436250.8, 3773158.6,     377.3,     377.3,       0.0);         ( 436520.8,
3773158.6,     377.8,     377.8,       0.0);
     ( 436550.8, 3773158.6,     378.0,     378.0,       0.0);         ( 436580.8,
3773158.6,     378.3,     378.3,       0.0);
     ( 436610.8, 3773158.6,     378.4,     378.4,       0.0);         ( 436640.8,
3773158.6,     378.8,     378.8,       0.0);
     ( 436670.8, 3773158.6,     379.1,     379.1,       0.0);         ( 436100.8,
3773188.6,     376.4,     376.4,       0.0);
     ( 436130.8, 3773188.6,     376.9,     376.9,       0.0);         ( 436160.8,
3773188.6,     377.4,     377.4,       0.0);
     ( 436190.8, 3773188.6,     378.3,     378.3,       0.0);         ( 436220.8,
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3773188.6,   378.2,   378.2,   0.0);
     (436250.8, 3773188.6,   378.1,   378.1,   0.0);   (436400.8,
3773188.6,   378.2,   378.2,   0.0);
     (436430.8, 3773188.6,   378.4,   378.4,   0.0);   (436460.8,
3773188.6,   378.7,   378.7,   0.0);
     (436490.8, 3773188.6,   378.7,   378.7,   0.0);   (436520.8,
3773188.6,   378.7,   378.7,   0.0);
     (436550.8, 3773188.6,   378.9,   378.9,   0.0);   (436580.8,
3773188.6,   379.1,   379.1,   0.0);
     (436610.8, 3773188.6,   379.3,   379.3,   0.0);   (436640.8,
3773188.6,   379.7,   379.7,   0.0);
     (436670.8, 3773188.6,   380.0,   380.0,   0.0);   (436100.8,
3773218.6,   377.1,   377.1,   0.0);
     (436130.8, 3773218.6,   377.4,   377.4,   0.0);   (436160.8,
3773218.6,   377.9,   377.9,   0.0);
     (436190.8, 3773218.6,   378.7,   378.7,   0.0);   (436220.8,
3773218.6,   378.8,   378.8,   0.0);
     (436250.8, 3773218.6,   379.3,   379.3,   0.0);   (436280.8,
3773218.6,   379.8,   379.8,   0.0);
     (436310.8, 3773218.6,   379.7,   379.7,   0.0);   (436340.8,
3773218.6,   379.5,   379.5,   0.0);

 *** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

                                                  *** DISCRETE CARTESIAN RECEPTORS ***
                                                (X-COORD, Y-COORD, ZELEV, ZHILL, ZFLAG)
                                                             (METERS)

     (436370.8, 3773218.6,   379.2,   379.2,   0.0);   (436400.8,
3773218.6,   379.0,   379.0,   0.0);
     (436430.8, 3773218.6,   379.2,   379.2,   0.0);   (436460.8,
3773218.6,   379.6,   379.6,   0.0);
     (436490.8, 3773218.6,   379.6,   379.6,   0.0);   (436520.8,
3773218.6,   379.5,   379.5,   0.0);
     (436550.8, 3773218.6,   379.7,   379.7,   0.0);   (436580.8,
3773218.6,   380.0,   380.0,   0.0);
     (436610.8, 3773218.6,   380.2,   380.2,   0.0);   (436640.8,
3773218.6,   380.7,   380.7,   0.0);
     (436670.8, 3773218.6,   381.0,   381.0,   0.0);   (436100.8,
3773248.6,   378.0,   378.0,   0.0);
     (436130.8, 3773248.6,   378.3,   378.3,   0.0);   (436160.8,
3773248.6,   378.8,   378.8,   0.0);
     (436190.8, 3773248.6,   379.5,   379.5,   0.0);   (436220.8,

```
3773248.6,     379.3,     379.3,       0.0);
     ( 436250.8, 3773248.6,     380.0,     380.0,       0.0);         ( 436280.8,
3773248.6,     380.5,     380.5,       0.0);
     ( 436310.8, 3773248.6,     380.3,     380.3,       0.0);         ( 436340.8,
3773248.6,     380.3,     380.3,       0.0);
     ( 436370.8, 3773248.6,     379.9,     379.9,       0.0);         ( 436400.8,
3773248.6,     379.9,     379.9,       0.0);
     ( 436430.8, 3773248.6,     380.2,     380.2,       0.0);         ( 436460.8,
3773248.6,     380.5,     380.5,       0.0);
     ( 436490.8, 3773248.6,     380.5,     380.5,       0.0);         ( 436520.8,
3773248.6,     380.4,     380.4,       0.0);
     ( 436550.8, 3773248.6,     380.6,     380.6,       0.0);         ( 436580.8,
3773248.6,     381.0,     381.0,       0.0);
     ( 436610.8, 3773248.6,     381.1,     381.1,       0.0);         ( 436640.8,
3773248.6,     381.6,     381.6,       0.0);
     ( 436670.8, 3773248.6,     381.9,     381.9,       0.0);         ( 436100.8,
3773278.6,     379.1,     379.1,       0.0);
     ( 436130.8, 3773278.6,     379.6,     379.6,       0.0);         ( 436160.8,
3773278.6,     380.5,     380.5,       0.0);
     ( 436190.8, 3773278.6,     380.9,     380.9,       0.0);         ( 436220.8,
3773278.6,     380.1,     380.1,       0.0);
     ( 436250.8, 3773278.6,     380.6,     380.6,       0.0);         ( 436280.8,
3773278.6,     380.8,     380.8,       0.0);
     ( 436310.8, 3773278.6,     380.6,     380.6,       0.0);         ( 436340.8,
3773278.6,     380.6,     380.6,       0.0);
     ( 436370.8, 3773278.6,     380.6,     380.6,       0.0);         ( 436400.8,
3773278.6,     380.8,     380.8,       0.0);
     ( 436430.8, 3773278.6,     380.9,     380.9,       0.0);         ( 436460.8,
3773278.6,     381.2,     381.2,       0.0);
     ( 436490.8, 3773278.6,     381.3,     381.3,       0.0);         ( 436520.8,
3773278.6,     381.4,     381.4,       0.0);
     ( 436550.8, 3773278.6,     381.6,     381.6,       0.0);         ( 436580.8,
3773278.6,     381.9,     381.9,       0.0);
     ( 436610.8, 3773278.6,     382.0,     382.0,       0.0);         ( 436640.8,
3773278.6,     382.4,     382.4,       0.0);
     ( 436670.8, 3773278.6,     382.7,     382.7,       0.0);         ( 436100.8,
3773308.6,     380.2,     380.2,       0.0);
     ( 436130.8, 3773308.6,     380.5,     380.5,       0.0);         ( 436160.8,
3773308.6,     381.3,     381.3,       0.0);
     ( 436190.8, 3773308.6,     381.6,     381.6,       0.0);         ( 436220.8,
3773308.6,     380.9,     380.9,       0.0);
     ( 436250.8, 3773308.6,     381.3,     381.3,       0.0);         ( 436280.8,
3773308.6,     381.5,     381.5,       0.0);
     ( 436310.8, 3773308.6,     381.4,     381.4,       0.0);         ( 436340.8,
3773308.6,     381.4,     381.4,       0.0);
     ( 436370.8, 3773308.6,     381.5,     381.5,       0.0);         ( 436400.8,
3773308.6,     381.7,     381.7,       0.0);
     ( 436430.8, 3773308.6,     381.8,     381.8,       0.0);         ( 436460.8,
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3773308.6,   382.1,   382.1,   0.0);
     (436490.8, 3773308.6,   382.2,   382.2,   0.0);   (436520.8,
3773308.6,   382.3,   382.3,   0.0);
     (436550.8, 3773308.6,   382.4,   382.4,   0.0);   (436580.8,
3773308.6,   382.8,   382.8,   0.0);
     (436610.8, 3773308.6,   382.9,   382.9,   0.0);   (436640.8,
3773308.6,   383.2,   383.2,   0.0);
     (436670.8, 3773308.6,   383.6,   383.6,   0.0);   (436100.8,
3773338.6,   381.4,   381.4,   0.0);
     (436130.8, 3773338.6,   381.4,   381.4,   0.0);   (436160.8,
3773338.6,   381.8,   381.8,   0.0);
     (436190.8, 3773338.6,   382.0,   382.0,   0.0);   (436220.8,
3773338.6,   381.6,   381.6,   0.0);
     (436250.8, 3773338.6,   381.9,   381.9,   0.0);   (436280.8,
3773338.6,   382.1,   382.1,   0.0);
     (436310.8, 3773338.6,   382.0,   382.0,   0.0);   (436340.8,
3773338.6,   382.1,   382.1,   0.0);
     (436370.8, 3773338.6,   382.3,   382.3,   0.0);   (436400.8,
3773338.6,   382.7,   382.7,   0.0);
     (436430.8, 3773338.6,   382.7,   382.7,   0.0);   (436460.8,
3773338.6,   383.0,   383.0,   0.0);
     (436490.8, 3773338.6,   383.1,   383.1,   0.0);   (436520.8,
3773338.6,   383.2,   383.2,   0.0);
     (436550.8, 3773338.6,   383.3,   383.3,   0.0);   (436580.8,
3773338.6,   383.6,   383.6,   0.0);
     (436610.8, 3773338.6,   383.7,   383.7,   0.0);   (436640.8,
3773338.6,   384.0,   384.0,   0.0);

 *** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

                                                  *** DISCRETE CARTESIAN RECEPTORS ***
                                                 (X-COORD, Y-COORD, ZELEV, ZHILL, ZFLAG)
                                                              (METERS)

     (436670.8, 3773338.6,   384.4,   384.4,   0.0);   (436100.8,
3773368.6,   382.5,   382.5,   0.0);
     (436130.8, 3773368.6,   382.4,   382.4,   0.0);   (436160.8,
3773368.6,   382.6,   382.6,   0.0);
     (436190.8, 3773368.6,   382.8,   382.8,   0.0);   (436220.8,
3773368.6,   382.4,   382.4,   0.0);
     (436250.8, 3773368.6,   382.7,   382.7,   0.0);   (436280.8,
3773368.6,   382.9,   382.9,   0.0);
     (436310.8, 3773368.6,   382.8,   382.8,   0.0);   (436340.8,

3773368.6,   382.8,   382.8,   0.0);
     (436370.8, 3773368.6,   383.2,   383.2,   0.0);   (436400.8,
3773368.6,   383.6,   383.6,   0.0);
     (436430.8, 3773368.6,   383.7,   383.7,   0.0);   (436460.8,
3773368.6,   383.9,   383.9,   0.0);
     (436490.8, 3773368.6,   384.0,   384.0,   0.0);   (436520.8,
3773368.6,   384.2,   384.2,   0.0);
     (436550.8, 3773368.6,   384.4,   384.4,   0.0);   (436580.8,
3773368.6,   384.5,   384.5,   0.0);
     (436610.8, 3773368.6,   384.6,   384.6,   0.0);   (436640.8,
3773368.6,   384.9,   384.9,   0.0);
     (436670.8, 3773368.6,   385.2,   385.2,   0.0);   (436100.8,
3773398.6,   383.4,   383.4,   0.0);
     (436130.8, 3773398.6,   383.4,   383.4,   0.0);   (436160.8,
3773398.6,   383.6,   383.6,   0.0);
     (436190.8, 3773398.6,   383.7,   383.7,   0.0);   (436220.8,
3773398.6,   383.6,   383.6,   0.0);
     (436250.8, 3773398.6,   383.9,   383.9,   0.0);   (436280.8,
3773398.6,   384.1,   384.1,   0.0);
     (436310.8, 3773398.6,   384.1,   384.1,   0.0);   (436340.8,
3773398.6,   384.0,   384.0,   0.0);
     (436370.8, 3773398.6,   384.2,   384.2,   0.0);   (436400.8,
3773398.6,   384.5,   384.5,   0.0);
     (436430.8, 3773398.6,   384.8,   384.8,   0.0);   (436460.8,
3773398.6,   384.8,   384.8,   0.0);
     (436490.8, 3773398.6,   384.8,   384.8,   0.0);   (436520.8,
3773398.6,   385.1,   385.1,   0.0);
     (436550.8, 3773398.6,   385.2,   385.2,   0.0);   (436580.8,
3773398.6,   385.3,   385.3,   0.0);
     (436610.8, 3773398.6,   385.5,   385.5,   0.0);   (436640.8,
3773398.6,   385.7,   385.7,   0.0);
     (436670.8, 3773398.6,   386.0,   386.0,   0.0);   (437509.7,
3774019.0,   408.3,   408.3,   0.0);
     (437522.0, 3774019.0,   407.4,   407.4,   0.0);   (437534.4,
3774019.0,   407.2,   407.2,   0.0);
     (437546.7, 3774019.0,   407.0,   407.0,   0.0);   (437559.0,
3774019.0,   406.9,   406.9,   0.0);
     (437509.7, 3774027.3,   408.7,   408.7,   0.0);   (437522.0,
3774027.3,   407.7,   407.7,   0.0);
     (437534.4, 3774027.3,   407.4,   407.4,   0.0);   (437546.7,
3774027.3,   407.2,   407.2,   0.0);
     (437559.0, 3774027.3,   407.1,   407.1,   0.0);   (437509.7,
3774035.7,   408.9,   408.9,   0.0);
     (437522.0, 3774035.7,   407.9,   407.9,   0.0);   (437534.4,
3774035.7,   407.7,   407.7,   0.0);
     (437546.7, 3774035.7,   407.5,   407.5,   0.0);   (437559.0,
3774035.7,   407.3,   407.3,   0.0);
     (437509.7, 3774044.0,   409.2,   409.2,   0.0);   (437522.0,

3774044.0,   408.2,   408.2,   0.0);
     (437534.4, 3774044.0,   407.9,   407.9,   0.0);   (437546.7,
3774044.0,   407.7,   407.7,   0.0);
     (437559.0, 3774044.0,   407.5,   407.5,   0.0);   (437509.7,
3774052.3,   409.4,   409.4,   0.0);
     (437522.0, 3774052.3,   408.4,   408.4,   0.0);   (437534.4,
3774052.3,   408.1,   408.1,   0.0);
     (437546.7, 3774052.3,   408.0,   408.0,   0.0);   (437559.0,
3774052.3,   407.7,   407.7,   0.0);
     (437509.7, 3774060.7,   409.6,   409.6,   0.0);   (437522.0,
3774060.7,   408.7,   408.7,   0.0);
     (437534.4, 3774060.7,   408.4,   408.4,   0.0);   (437546.7,
3774060.7,   408.2,   408.2,   0.0);
     (437559.0, 3774060.7,   408.1,   408.1,   0.0);   (437509.7,
3774069.0,   409.8,   409.8,   0.0);
     (437522.0, 3774069.0,   408.9,   408.9,   0.0);   (437534.4,
3774069.0,   408.7,   408.7,   0.0);
     (437546.7, 3774069.0,   408.5,   408.5,   0.0);   (437559.0,
3774069.0,   408.4,   408.4,   0.0);
     (437509.7, 3774077.3,   410.0,   410.0,   0.0);   (437522.0,
3774077.3,   409.2,   409.2,   0.0);
     (437534.4, 3774077.3,   408.9,   408.9,   0.0);   (437546.7,
3774077.3,   408.8,   408.8,   0.0);
     (437559.0, 3774077.3,   408.7,   408.7,   0.0);   (437509.7,
3774085.6,   410.2,   410.2,   0.0);
     (437522.0, 3774085.6,   409.5,   409.5,   0.0);   (437534.4,
3774085.6,   409.3,   409.3,   0.0);
     (437546.7, 3774085.6,   409.2,   409.2,   0.0);   (437559.0,
3774085.6,   409.1,   409.1,   0.0);
     (437509.7, 3774094.0,   410.5,   410.5,   0.0);   (437522.0,
3774094.0,   409.9,   409.9,   0.0);
     (437534.4, 3774094.0,   409.7,   409.7,   0.0);   (437546.7,
3774094.0,   409.5,   409.5,   0.0);
 *** AERMOD - VERSION 19191 ***   *** C:\Lakes\AERMOD View\Bridge Upland\Bridge
Upland.isc   ***   01/15/20
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 *** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

                                                 *** DISCRETE CARTESIAN RECEPTORS ***
                                               (X-COORD, Y-COORD, ZELEV, ZHILL, ZFLAG)
                                                           (METERS)

     (437559.0, 3774094.0,   409.4,   409.4,   0.0);   (437509.7,
3774102.3,   410.7,   410.7,   0.0);
     (437522.0, 3774102.3,   410.3,   410.3,   0.0);   (437534.4,

3774102.3,   410.0,   410.0,   0.0);
     (437546.7, 3774102.3,   409.8,   409.8,   0.0);   (437559.0,
3774102.3,   409.8,   409.8,   0.0);
     (437509.7, 3774110.6,   410.9,   410.9,   0.0);   (437522.0,
3774110.6,   410.7,   410.7,   0.0);
     (437534.4, 3774110.6,   410.4,   410.4,   0.0);   (437546.7,
3774110.6,   410.2,   410.2,   0.0);
     (437559.0, 3774110.6,   410.1,   410.1,   0.0);   (437571.4,
3774110.6,   410.2,   410.2,   0.0);
     (437583.7, 3774110.6,   410.2,   410.2,   0.0);   (437596.1,
3774110.6,   410.4,   410.4,   0.0);
     (437608.4, 3774110.6,   410.5,   410.5,   0.0);   (437620.7,
3774110.6,   410.6,   410.6,   0.0);
     (437633.1, 3774110.6,   410.8,   410.8,   0.0);   (437645.4,
3774110.6,   410.9,   410.9,   0.0);
     (437657.8, 3774110.6,   411.0,   411.0,   0.0);   (437670.1,
3774110.6,   410.9,   410.9,   0.0);
     (437682.4, 3774110.6,   410.8,   410.8,   0.0);   (437694.8,
3774110.6,   410.6,   410.6,   0.0);
     (437707.1, 3774110.6,   410.4,   410.4,   0.0);   (437719.5,
3774110.6,   410.3,   410.3,   0.0);
     (437731.8, 3774110.6,   410.2,   410.2,   0.0);   (437744.1,
3774110.6,   410.1,   410.1,   0.0);
     (437756.5, 3774110.6,   409.9,   409.9,   0.0);   (437509.7,
3774119.0,   411.1,   411.1,   0.0);
     (437522.0, 3774119.0,   410.9,   410.9,   0.0);   (437534.4,
3774119.0,   410.7,   410.7,   0.0);
     (437546.7, 3774119.0,   410.5,   410.5,   0.0);   (437559.0,
3774119.0,   410.4,   410.4,   0.0);
     (437571.4, 3774119.0,   410.5,   410.5,   0.0);   (437583.7,
3774119.0,   410.6,   410.6,   0.0);
     (437596.1, 3774119.0,   410.8,   410.8,   0.0);   (437608.4,
3774119.0,   410.9,   410.9,   0.0);
     (437620.7, 3774119.0,   410.9,   410.9,   0.0);   (437633.1,
3774119.0,   411.1,   411.1,   0.0);
     (437645.4, 3774119.0,   411.2,   411.2,   0.0);   (437657.8,
3774119.0,   411.2,   411.2,   0.0);
     (437670.1, 3774119.0,   411.2,   411.2,   0.0);   (437682.4,
3774119.0,   411.0,   411.0,   0.0);
     (437694.8, 3774119.0,   410.9,   410.9,   0.0);   (437707.1,
3774119.0,   410.7,   410.7,   0.0);
     (437719.5, 3774119.0,   410.6,   410.6,   0.0);   (437731.8,
3774119.0,   410.5,   410.5,   0.0);
     (437744.1, 3774119.0,   410.4,   410.4,   0.0);   (437756.5,
3774119.0,   410.2,   410.2,   0.0);
     (437509.7, 3774127.3,   411.2,   411.2,   0.0);   (437522.0,
3774127.3,   411.1,   411.1,   0.0);
     (437534.4, 3774127.3,   410.9,   410.9,   0.0);   (437546.7,

3774127.3,   410.8,   410.8,   0.0);
     (437559.0, 3774127.3,   410.7,   410.7,   0.0);   (437571.4,
3774127.3,   410.7,   410.7,   0.0);
     (437583.7, 3774127.3,   410.9,   410.9,   0.0);   (437596.1,
3774127.3,   411.0,   411.0,   0.0);
     (437608.4, 3774127.3,   411.2,   411.2,   0.0);   (437620.7,
3774127.3,   411.2,   411.2,   0.0);
     (437633.1, 3774127.3,   411.3,   411.3,   0.0);   (437645.4,
3774127.3,   411.4,   411.4,   0.0);
     (437657.8, 3774127.3,   411.4,   411.4,   0.0);   (437670.1,
3774127.3,   411.3,   411.3,   0.0);
     (437682.4, 3774127.3,   411.2,   411.2,   0.0);   (437694.8,
3774127.3,   411.1,   411.1,   0.0);
     (437707.1, 3774127.3,   411.0,   411.0,   0.0);   (437719.5,
3774127.3,   410.9,   410.9,   0.0);
     (437731.8, 3774127.3,   410.8,   410.8,   0.0);   (437744.1,
3774127.3,   410.7,   410.7,   0.0);
     (437756.5, 3774127.3,   410.5,   410.5,   0.0);   (437509.7,
3774135.6,   411.3,   411.3,   0.0);
     (437522.0, 3774135.6,   411.3,   411.3,   0.0);   (437534.4,
3774135.6,   411.2,   411.2,   0.0);
     (437546.7, 3774135.6,   411.0,   411.0,   0.0);   (437559.0,
3774135.6,   411.0,   411.0,   0.0);
     (437571.4, 3774135.6,   411.0,   411.0,   0.0);   (437583.7,
3774135.6,   411.2,   411.2,   0.0);
     (437596.1, 3774135.6,   411.3,   411.3,   0.0);   (437608.4,
3774135.6,   411.4,   411.4,   0.0);
     (437620.7, 3774135.6,   411.5,   411.5,   0.0);   (437633.1,
3774135.6,   411.5,   411.5,   0.0);
     (437645.4, 3774135.6,   411.6,   411.6,   0.0);   (437657.8,
3774135.6,   411.6,   411.6,   0.0);
     (437670.1, 3774135.6,   411.5,   411.5,   0.0);   (437682.4,
3774135.6,   411.4,   411.4,   0.0);
     (437694.8, 3774135.6,   411.3,   411.3,   0.0);   (437707.1,
3774135.6,   411.2,   411.2,   0.0);
     (437719.5, 3774135.6,   411.2,   411.2,   0.0);   (437731.8,
3774135.6,   411.1,   411.1,   0.0);
     (437744.1, 3774135.6,   410.9,   410.9,   0.0);   (437756.5,
3774135.6,   410.8,   410.8,   0.0);

 *** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

                                                *** DISCRETE CARTESIAN RECEPTORS ***

(437509.7, 3774144.0, 411.4, 411.4, 0.0); (437522.0, 3774144.0, 411.5, 411.5, 0.0);
(437534.4, 3774144.0, 411.4, 411.4, 0.0); (437546.7, 3774144.0, 411.3, 411.3, 0.0);
(437559.0, 3774144.0, 411.3, 411.3, 0.0); (437571.4, 3774144.0, 411.3, 411.3, 0.0);
(437583.7, 3774144.0, 411.4, 411.4, 0.0); (437596.1, 3774144.0, 411.6, 411.6, 0.0);
(437608.4, 3774144.0, 411.7, 411.7, 0.0); (437620.7, 3774144.0, 411.7, 411.7, 0.0);
(437633.1, 3774144.0, 411.7, 411.7, 0.0); (437645.4, 3774144.0, 411.8, 411.8, 0.0);
(437657.8, 3774144.0, 411.7, 411.7, 0.0); (437670.1, 3774144.0, 411.6, 411.6, 0.0);
(437682.4, 3774144.0, 411.6, 411.6, 0.0); (437694.8, 3774144.0, 411.5, 411.5, 0.0);
(437707.1, 3774144.0, 411.5, 411.5, 0.0); (437719.5, 3774144.0, 411.4, 411.4, 0.0);
(437731.8, 3774144.0, 411.4, 411.4, 0.0); (437744.1, 3774144.0, 411.2, 411.2, 0.0);
(437756.5, 3774144.0, 411.1, 411.1, 0.0); (437509.7, 3774152.3, 411.7, 411.7, 0.0);
(437522.0, 3774152.3, 411.7, 411.7, 0.0); (437534.4, 3774152.3, 411.7, 411.7, 0.0);
(437546.7, 3774152.3, 411.6, 411.6, 0.0); (437559.0, 3774152.3, 411.6, 411.6, 0.0);
(437571.4, 3774152.3, 411.6, 411.6, 0.0); (437583.7, 3774152.3, 411.7, 411.7, 0.0);
(437596.1, 3774152.3, 411.9, 411.9, 0.0); (437608.4, 3774152.3, 411.9, 411.9, 0.0);
(437620.7, 3774152.3, 411.9, 411.9, 0.0); (437633.1, 3774152.3, 412.0, 412.0, 0.0);
(437645.4, 3774152.3, 412.0, 412.0, 0.0); (437657.8, 3774152.3, 412.0, 412.0, 0.0);
(437670.1, 3774152.3, 411.9, 411.9, 0.0); (437682.4, 3774152.3, 411.8, 411.8, 0.0);
(437694.8, 3774152.3, 411.8, 411.8, 0.0); (437707.1, 3774152.3, 411.8, 411.8, 0.0);
(437719.5, 3774152.3, 411.7, 411.7, 0.0); (437731.8, 3774152.3, 411.7, 411.7, 0.0);
(437744.1, 3774152.3, 411.6, 411.6, 0.0); (437756.5, 3774152.3, 411.5, 411.5, 0.0);
(437509.7, 3774160.6, 411.9, 411.9, 0.0); (437522.0, 3774160.6, 412.0, 412.0, 0.0);
(437534.4, 3774160.6, 412.0, 412.0, 0.0); (437546.7,

3774160.6,   411.9,   411.9,   0.0);
     (437559.0, 3774160.6,   411.9,   411.9,   0.0);   (437571.4,
3774160.6,   411.9,   411.9,   0.0);
     (437583.7, 3774160.6,   412.0,   412.0,   0.0);   (437596.1,
3774160.6,   412.1,   412.1,   0.0);
     (437608.4, 3774160.6,   412.2,   412.2,   0.0);   (437620.7,
3774160.6,   412.2,   412.2,   0.0);
     (437633.1, 3774160.6,   412.2,   412.2,   0.0);   (437645.4,
3774160.6,   412.2,   412.2,   0.0);
     (437657.8, 3774160.6,   412.2,   412.2,   0.0);   (437670.1,
3774160.6,   412.1,   412.1,   0.0);
     (437682.4, 3774160.6,   412.1,   412.1,   0.0);   (437694.8,
3774160.6,   412.1,   412.1,   0.0);
     (437707.1, 3774160.6,   412.0,   412.0,   0.0);   (437719.5,
3774160.6,   412.0,   412.0,   0.0);
     (437731.8, 3774160.6,   412.0,   412.0,   0.0);   (437744.1,
3774160.6,   411.9,   411.9,   0.0);
     (437756.5, 3774160.6,   411.9,   411.9,   0.0);   (437509.7,
3774168.9,   412.1,   412.1,   0.0);
     (437522.0, 3774168.9,   412.2,   412.2,   0.0);   (437534.4,
3774168.9,   412.2,   412.2,   0.0);
     (437546.7, 3774168.9,   412.2,   412.2,   0.0);   (437559.0,
3774168.9,   412.3,   412.3,   0.0);
     (437571.4, 3774168.9,   412.3,   412.3,   0.0);   (437583.7,
3774168.9,   412.3,   412.3,   0.0);
     (437596.1, 3774168.9,   412.4,   412.4,   0.0);   (437608.4,
3774168.9,   412.4,   412.4,   0.0);
     (437620.7, 3774168.9,   412.4,   412.4,   0.0);   (437633.1,
3774168.9,   412.4,   412.4,   0.0);
     (437645.4, 3774168.9,   412.4,   412.4,   0.0);   (437657.8,
3774168.9,   412.4,   412.4,   0.0);
     (437670.1, 3774168.9,   412.4,   412.4,   0.0);   (437682.4,
3774168.9,   412.3,   412.3,   0.0);
     (437694.8, 3774168.9,   412.3,   412.3,   0.0);   (437707.1,
3774168.9,   412.3,   412.3,   0.0);
     (437719.5, 3774168.9,   412.3,   412.3,   0.0);   (437731.8,
3774168.9,   412.3,   412.3,   0.0);
     (437744.1, 3774168.9,   412.3,   412.3,   0.0);   (437756.5,
3774168.9,   412.3,   412.3,   0.0);
     (437509.7, 3774177.3,   412.4,   412.4,   0.0);   (437522.0,
3774177.3,   412.5,   412.5,   0.0);
     (437534.4, 3774177.3,   412.5,   412.5,   0.0);   (437546.7,
3774177.3,   412.5,   412.5,   0.0);
     (437559.0, 3774177.3,   412.5,   412.5,   0.0);   (437571.4,
3774177.3,   412.6,   412.6,   0.0);
 *** AERMOD - VERSION 19191 ***   *** C:\Lakes\AERMOD View\Bridge Upland\Bridge
Upland.isc   ***   01/15/20
 *** AERMET - VERSION 16216 ***   ***

*** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

*** DISCRETE CARTESIAN RECEPTORS ***
(X-COORD, Y-COORD, ZELEV, ZHILL, ZFLAG)
(METERS)

(437583.7, 3774177.3, 412.6, 412.6, 0.0); (437596.1, 3774177.3, 412.6, 412.6, 0.0);
(437608.4, 3774177.3, 412.6, 412.6, 0.0); (437620.7, 3774177.3, 412.6, 412.6, 0.0);
(437633.1, 3774177.3, 412.6, 412.6, 0.0); (437645.4, 3774177.3, 412.6, 412.6, 0.0);
(437657.8, 3774177.3, 412.6, 412.6, 0.0); (437670.1, 3774177.3, 412.6, 412.6, 0.0);
(437682.4, 3774177.3, 412.6, 412.6, 0.0); (437694.8, 3774177.3, 412.6, 412.6, 0.0);
(437707.1, 3774177.3, 412.6, 412.6, 0.0); (437719.5, 3774177.3, 412.6, 412.6, 0.0);
(437731.8, 3774177.3, 412.6, 412.6, 0.0); (437744.1, 3774177.3, 412.6, 412.6, 0.0);
(437756.5, 3774177.3, 412.6, 412.6, 0.0); (437509.7, 3774185.6, 412.6, 412.6, 0.0);
(437522.0, 3774185.6, 412.7, 412.7, 0.0); (437534.4, 3774185.6, 412.7, 412.7, 0.0);
(437546.7, 3774185.6, 412.7, 412.7, 0.0); (437559.0, 3774185.6, 412.7, 412.7, 0.0);
(437571.4, 3774185.6, 412.7, 412.7, 0.0); (437583.7, 3774185.6, 412.8, 412.8, 0.0);
(437596.1, 3774185.6, 412.8, 412.8, 0.0); (437608.4, 3774185.6, 412.8, 412.8, 0.0);
(437620.7, 3774185.6, 412.8, 412.8, 0.0); (437633.1, 3774185.6, 412.8, 412.8, 0.0);
(437645.4, 3774185.6, 412.8, 412.8, 0.0); (437657.8, 3774185.6, 412.8, 412.8, 0.0);
(437670.1, 3774185.6, 412.8, 412.8, 0.0); (437682.4, 3774185.6, 412.8, 412.8, 0.0);
(437694.8, 3774185.6, 412.8, 412.8, 0.0); (437707.1, 3774185.6, 412.8, 412.8, 0.0);
(437719.5, 3774185.6, 412.7, 412.7, 0.0); (437731.8, 3774185.6, 412.7, 412.7, 0.0);
(437744.1, 3774185.6, 412.7, 412.7, 0.0); (437756.5, 3774185.6, 412.8, 412.8, 0.0);
(436401.5, 3773426.4, 385.5, 385.5, 0.0); (436409.6, 3773426.4, 385.7, 385.7, 0.0);
(436417.7, 3773426.4, 385.9, 385.9, 0.0); (436425.9,

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3773426.4,     386.0,     386.0,       0.0);
     ( 436434.0, 3773426.4,     386.0,     386.0,       0.0);         ( 436442.1,
3773426.4,     386.0,     386.0,       0.0);
     ( 436450.3, 3773426.4,     386.0,     386.0,       0.0);         ( 436458.4,
3773426.4,     385.9,     385.9,       0.0);
     ( 436466.6, 3773426.4,     385.8,     385.8,       0.0);         ( 436474.7,
3773426.4,     385.8,     385.8,       0.0);
     ( 436482.8, 3773426.4,     385.7,     385.7,       0.0);         ( 436491.0,
3773426.4,     385.7,     385.7,       0.0);
     ( 436499.1, 3773426.4,     385.7,     385.7,       0.0);         ( 436507.3,
3773426.4,     385.8,     385.8,       0.0);
     ( 436515.4, 3773426.4,     385.8,     385.8,       0.0);         ( 436523.5,
3773426.4,     385.9,     385.9,       0.0);
     ( 436531.7, 3773426.4,     386.0,     386.0,       0.0);         ( 436539.8,
3773426.4,     386.0,     386.0,       0.0);
     ( 436548.0, 3773426.4,     386.1,     386.1,       0.0);         ( 436556.1,
3773426.4,     386.1,     386.1,       0.0);
     ( 436401.5, 3773445.2,     386.3,     386.3,       0.0);         ( 436409.6,
3773445.2,     386.6,     386.6,       0.0);
     ( 436417.7, 3773445.2,     386.9,     386.9,       0.0);         ( 436425.9,
3773445.2,     386.9,     386.9,       0.0);
     ( 436434.0, 3773445.2,     386.9,     386.9,       0.0);         ( 436442.1,
3773445.2,     386.9,     386.9,       0.0);
     ( 436450.3, 3773445.2,     386.8,     386.8,       0.0);         ( 436458.4,
3773445.2,     386.7,     386.7,       0.0);
     ( 436466.6, 3773445.2,     386.6,     386.6,       0.0);         ( 436474.7,
3773445.2,     386.5,     386.5,       0.0);
     ( 436482.8, 3773445.2,     386.4,     386.4,       0.0);         ( 436491.0,
3773445.2,     386.3,     386.3,       0.0);
     ( 436499.1, 3773445.2,     386.3,     386.3,       0.0);         ( 436507.3,
3773445.2,     386.4,     386.4,       0.0);
     ( 436515.4, 3773445.2,     386.5,     386.5,       0.0);         ( 436523.5,
3773445.2,     386.6,     386.6,       0.0);
     ( 436531.7, 3773445.2,     386.6,     386.6,       0.0);         ( 436539.8,
3773445.2,     386.7,     386.7,       0.0);
     ( 436548.0, 3773445.2,     386.7,     386.7,       0.0);         ( 436556.1,
3773445.2,     386.7,     386.7,       0.0);
     ( 436401.5, 3773464.1,     386.9,     386.9,       0.0);         ( 436409.6,
3773464.1,     387.1,     387.1,       0.0);
     ( 436417.7, 3773464.1,     387.4,     387.4,       0.0);         ( 436425.9,
3773464.1,     387.3,     387.3,       0.0);
     ( 436434.0, 3773464.1,     387.2,     387.2,       0.0);         ( 436442.1,
3773464.1,     387.2,     387.2,       0.0);
     ( 436450.3, 3773464.1,     387.2,     387.2,       0.0);         ( 436458.4,
3773464.1,     387.1,     387.1,       0.0);
     ( 436466.6, 3773464.1,     387.1,     387.1,       0.0);         ( 436474.7,
3773464.1,     387.1,     387.1,       0.0);
     ( 436482.8, 3773464.1,     387.1,     387.1,       0.0);         ( 436491.0,
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3773464.1, 387.1, 387.1, 0.0);
(436499.1, 3773464.1, 387.2, 387.2, 0.0); (436507.3, 3773464.1, 387.3, 387.3, 0.0);

*** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

*** DISCRETE CARTESIAN RECEPTORS ***
(X-COORD, Y-COORD, ZELEV, ZHILL, ZFLAG)
(METERS)

(436515.4, 3773464.1, 387.4, 387.4, 0.0); (436523.5, 3773464.1, 387.5, 387.5, 0.0);
(436531.7, 3773464.1, 387.5, 387.5, 0.0); (436539.8, 3773464.1, 387.6, 387.6, 0.0);
(436548.0, 3773464.1, 387.6, 387.6, 0.0); (436556.1, 3773464.1, 387.4, 387.4, 0.0);
(436401.5, 3773482.9, 387.4, 387.4, 0.0); (436409.6, 3773482.9, 387.6, 387.6, 0.0);
(436417.7, 3773482.9, 387.7, 387.7, 0.0); (436425.9, 3773482.9, 387.7, 387.7, 0.0);
(436434.0, 3773482.9, 387.7, 387.7, 0.0); (436442.1, 3773482.9, 387.6, 387.6, 0.0);
(436450.3, 3773482.9, 387.7, 387.7, 0.0); (436458.4, 3773482.9, 387.8, 387.8, 0.0);
(436466.6, 3773482.9, 387.8, 387.8, 0.0); (436474.7, 3773482.9, 387.9, 387.9, 0.0);
(436482.8, 3773482.9, 388.0, 388.0, 0.0); (436491.0, 3773482.9, 388.0, 388.0, 0.0);
(436499.1, 3773482.9, 388.1, 388.1, 0.0); (436507.3, 3773482.9, 388.2, 388.2, 0.0);
(436515.4, 3773482.9, 388.2, 388.2, 0.0); (436523.5, 3773482.9, 388.3, 388.3, 0.0);
(436531.7, 3773482.9, 388.3, 388.3, 0.0); (436539.8, 3773482.9, 388.3, 388.3, 0.0);
(436548.0, 3773482.9, 388.2, 388.2, 0.0); (436556.1, 3773482.9, 388.0, 388.0, 0.0);
(436401.5, 3773501.8, 387.9, 387.9, 0.0); (436409.6, 3773501.8, 388.0, 388.0, 0.0);
(436417.7, 3773501.8, 388.1, 388.1, 0.0); (436425.9, 3773501.8, 388.1, 388.1, 0.0);
(436434.0, 3773501.8, 388.2, 388.2, 0.0); (436442.1, 3773501.8, 388.2, 388.2, 0.0);
(436450.3, 3773501.8, 388.4, 388.4, 0.0); (436458.4,

```
3773501.8,     388.6,     388.6,       0.0);
     ( 436466.6, 3773501.8,     388.8,     388.8,       0.0);         ( 436474.7,
3773501.8,     388.9,     388.9,       0.0);
     ( 436482.8, 3773501.8,     388.9,     388.9,       0.0);         ( 436491.0,
3773501.8,     389.0,     389.0,       0.0);
     ( 436499.1, 3773501.8,     389.0,     389.0,       0.0);         ( 436507.3,
3773501.8,     389.0,     389.0,       0.0);
     ( 436515.4, 3773501.8,     389.1,     389.1,       0.0);         ( 436523.5,
3773501.8,     389.1,     389.1,       0.0);
     ( 436531.7, 3773501.8,     389.0,     389.0,       0.0);         ( 436539.8,
3773501.8,     388.9,     388.9,       0.0);
     ( 436548.0, 3773501.8,     388.8,     388.8,       0.0);         ( 436556.1,
3773501.8,     388.4,     388.4,       0.0);
     ( 436401.5, 3773520.6,     388.5,     388.5,       0.0);         ( 436409.6,
3773520.6,     388.5,     388.5,       0.0);
     ( 436417.7, 3773520.6,     388.6,     388.6,       0.0);         ( 436425.9,
3773520.6,     388.6,     388.6,       0.0);
     ( 436434.0, 3773520.6,     388.7,     388.7,       0.0);         ( 436442.1,
3773520.6,     388.7,     388.7,       0.0);
     ( 436450.3, 3773520.6,     388.9,     388.9,       0.0);         ( 436458.4,
3773520.6,     389.1,     389.1,       0.0);
     ( 436466.6, 3773520.6,     389.3,     389.3,       0.0);         ( 436474.7,
3773520.6,     389.4,     389.4,       0.0);
     ( 436482.8, 3773520.6,     389.4,     389.4,       0.0);         ( 436491.0,
3773520.6,     389.4,     389.4,       0.0);
     ( 436499.1, 3773520.6,     389.4,     389.4,       0.0);         ( 436507.3,
3773520.6,     389.4,     389.4,       0.0);
     ( 436515.4, 3773520.6,     389.3,     389.3,       0.0);         ( 436523.5,
3773520.6,     389.3,     389.3,       0.0);
     ( 436531.7, 3773520.6,     389.2,     389.2,       0.0);         ( 436539.8,
3773520.6,     389.2,     389.2,       0.0);
     ( 436548.0, 3773520.6,     389.1,     389.1,       0.0);         ( 436556.1,
3773520.6,     388.9,     388.9,       0.0);
     ( 436401.5, 3773539.5,     389.1,     389.1,       0.0);         ( 436409.6,
3773539.5,     389.1,     389.1,       0.0);
     ( 436417.7, 3773539.5,     389.1,     389.1,       0.0);         ( 436425.9,
3773539.5,     389.1,     389.1,       0.0);
     ( 436434.0, 3773539.5,     389.2,     389.2,       0.0);         ( 436442.1,
3773539.5,     389.2,     389.2,       0.0);
     ( 436450.3, 3773539.5,     389.3,     389.3,       0.0);         ( 436458.4,
3773539.5,     389.4,     389.4,       0.0);
     ( 436466.6, 3773539.5,     389.6,     389.6,       0.0);         ( 436474.7,
3773539.5,     389.7,     389.7,       0.0);
     ( 436482.8, 3773539.5,     389.7,     389.7,       0.0);         ( 436491.0,
3773539.5,     389.7,     389.7,       0.0);
     ( 436499.1, 3773539.5,     389.7,     389.7,       0.0);         ( 436507.3,
3773539.5,     389.6,     389.6,       0.0);
     ( 436515.4, 3773539.5,     389.6,     389.6,       0.0);         ( 436523.5,
```

3773539.5,   389.5,   389.5,   0.0);
     (436531.7, 3773539.5,   389.5,   389.5,   0.0);   (436539.8,
3773539.5,   389.5,   389.5,   0.0);
     (436548.0, 3773539.5,   389.4,   389.4,   0.0);   (436556.1,
3773539.5,   389.3,   389.3,   0.0);
     (436401.5, 3773558.3,   389.7,   389.7,   0.0);   (436409.6,
3773558.3,   389.6,   389.6,   0.0);
     (436417.7, 3773558.3,   389.6,   389.6,   0.0);   (436425.9,
3773558.3,   389.5,   389.5,   0.0);

 *** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

                                                  *** DISCRETE CARTESIAN RECEPTORS ***
                                                (X-COORD, Y-COORD, ZELEV, ZHILL, ZFLAG)
                                                             (METERS)

     (436434.0, 3773558.3,   389.5,   389.5,   0.0);   (436442.1,
3773558.3,   389.4,   389.4,   0.0);
     (436450.3, 3773558.3,   389.5,   389.5,   0.0);   (436458.4,
3773558.3,   389.6,   389.6,   0.0);
     (436466.6, 3773558.3,   389.7,   389.7,   0.0);   (436474.7,
3773558.3,   389.7,   389.7,   0.0);
     (436482.8, 3773558.3,   389.8,   389.8,   0.0);   (436491.0,
3773558.3,   389.8,   389.8,   0.0);
     (436499.1, 3773558.3,   389.8,   389.8,   0.0);   (436507.3,
3773558.3,   389.8,   389.8,   0.0);
     (436515.4, 3773558.3,   389.8,   389.8,   0.0);   (436523.5,
3773558.3,   389.8,   389.8,   0.0);
     (436531.7, 3773558.3,   389.8,   389.8,   0.0);   (436539.8,
3773558.3,   389.8,   389.8,   0.0);
     (436548.0, 3773558.3,   389.8,   389.8,   0.0);   (436556.1,
3773558.3,   389.7,   389.7,   0.0);
     (436401.5, 3773577.2,   390.2,   390.2,   0.0);   (436409.6,
3773577.2,   390.1,   390.1,   0.0);
     (436417.7, 3773577.2,   390.0,   390.0,   0.0);   (436425.9,
3773577.2,   390.0,   390.0,   0.0);
     (436434.0, 3773577.2,   389.9,   389.9,   0.0);   (436442.1,
3773577.2,   389.8,   389.8,   0.0);
     (436450.3, 3773577.2,   389.9,   389.9,   0.0);   (436458.4,
3773577.2,   389.9,   389.9,   0.0);
     (436466.6, 3773577.2,   390.0,   390.0,   0.0);   (436474.7,
3773577.2,   390.1,   390.1,   0.0);
     (436482.8, 3773577.2,   390.1,   390.1,   0.0);   (436491.0,

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3773577.2,     390.2,     390.2,       0.0);
     ( 436499.1, 3773577.2,     390.2,     390.2,       0.0);         ( 436507.3,
3773577.2,     390.2,     390.2,       0.0);
     ( 436515.4, 3773577.2,     390.2,     390.2,       0.0);         ( 436523.5,
3773577.2,     390.2,     390.2,       0.0);
     ( 436531.7, 3773577.2,     390.2,     390.2,       0.0);         ( 436539.8,
3773577.2,     390.2,     390.2,       0.0);
     ( 436548.0, 3773577.2,     390.2,     390.2,       0.0);         ( 436556.1,
3773577.2,     390.2,     390.2,       0.0);
     ( 436401.5, 3773596.0,     390.7,     390.7,       0.0);         ( 436409.6,
3773596.0,     390.6,     390.6,       0.0);
     ( 436417.7, 3773596.0,     390.5,     390.5,       0.0);         ( 436425.9,
3773596.0,     390.4,     390.4,       0.0);
     ( 436434.0, 3773596.0,     390.4,     390.4,       0.0);         ( 436442.1,
3773596.0,     390.4,     390.4,       0.0);
     ( 436450.3, 3773596.0,     390.4,     390.4,       0.0);         ( 436458.4,
3773596.0,     390.5,     390.5,       0.0);
     ( 436466.6, 3773596.0,     390.6,     390.6,       0.0);         ( 436474.7,
3773596.0,     390.6,     390.6,       0.0);
     ( 436482.8, 3773596.0,     390.6,     390.6,       0.0);         ( 436491.0,
3773596.0,     390.7,     390.7,       0.0);
     ( 436499.1, 3773596.0,     390.7,     390.7,       0.0);         ( 436507.3,
3773596.0,     390.6,     390.6,       0.0);
     ( 436515.4, 3773596.0,     390.6,     390.6,       0.0);         ( 436523.5,
3773596.0,     390.6,     390.6,       0.0);
     ( 436531.7, 3773596.0,     390.7,     390.7,       0.0);         ( 436539.8,
3773596.0,     390.7,     390.7,       0.0);
     ( 436548.0, 3773596.0,     390.8,     390.8,       0.0);         ( 436556.1,
3773596.0,     390.8,     390.8,       0.0);
     ( 436401.5, 3773614.9,     391.4,     391.4,       0.0);         ( 436409.6,
3773614.9,     391.4,     391.4,       0.0);
     ( 436417.7, 3773614.9,     391.3,     391.3,       0.0);         ( 436425.9,
3773614.9,     391.3,     391.3,       0.0);
     ( 436434.0, 3773614.9,     391.3,     391.3,       0.0);         ( 436442.1,
3773614.9,     391.4,     391.4,       0.0);
     ( 436450.3, 3773614.9,     391.4,     391.4,       0.0);         ( 436458.4,
3773614.9,     391.5,     391.5,       0.0);
     ( 436466.6, 3773614.9,     391.6,     391.6,       0.0);         ( 436474.7,
3773614.9,     391.6,     391.6,       0.0);
     ( 436482.8, 3773614.9,     391.7,     391.7,       0.0);         ( 436491.0,
3773614.9,     391.7,     391.7,       0.0);
     ( 436499.1, 3773614.9,     391.8,     391.8,       0.0);         ( 436507.3,
3773614.9,     391.7,     391.7,       0.0);
     ( 436515.4, 3773614.9,     391.7,     391.7,       0.0);         ( 436523.5,
3773614.9,     391.7,     391.7,       0.0);
     ( 436531.7, 3773614.9,     391.6,     391.6,       0.0);         ( 436539.8,
3773614.9,     391.5,     391.5,       0.0);
     ( 436548.0, 3773614.9,     391.5,     391.5,       0.0);         ( 436556.1,
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3773614.9,   391.4,   391.4,   0.0);
     (436401.5, 3773633.7,   392.1,   392.1,   0.0);   (436409.6,
3773633.7,   392.1,   392.1,   0.0);
     (436417.7, 3773633.7,   392.1,   392.1,   0.0);   (436425.9,
3773633.7,   392.1,   392.1,   0.0);
     (436434.0, 3773633.7,   392.2,   392.2,   0.0);   (436442.1,
3773633.7,   392.2,   392.2,   0.0);
     (436450.3, 3773633.7,   392.3,   392.3,   0.0);   (436458.4,
3773633.7,   392.4,   392.4,   0.0);
     (436466.6, 3773633.7,   392.4,   392.4,   0.0);   (436474.7,
3773633.7,   392.5,   392.5,   0.0);
     (436482.8, 3773633.7,   392.6,   392.6,   0.0);   (436491.0,
3773633.7,   392.7,   392.7,   0.0);
     (436401.5, 3773652.6,   392.7,   392.7,   0.0);   (436409.6,
3773652.6,   392.7,   392.7,   0.0);

 *** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

                                                  *** DISCRETE CARTESIAN RECEPTORS ***
                                                 (X-COORD, Y-COORD, ZELEV, ZHILL, ZFLAG)
                                                              (METERS)

     (436417.7, 3773652.6,   392.7,   392.7,   0.0);   (436425.9,
3773652.6,   392.8,   392.8,   0.0);
     (436434.0, 3773652.6,   392.8,   392.8,   0.0);   (436442.1,
3773652.6,   392.8,   392.8,   0.0);
     (436450.3, 3773652.6,   392.9,   392.9,   0.0);   (436458.4,
3773652.6,   393.0,   393.0,   0.0);
     (436466.6, 3773652.6,   393.1,   393.1,   0.0);   (436474.7,
3773652.6,   393.2,   393.2,   0.0);
     (436482.8, 3773652.6,   393.2,   393.2,   0.0);   (436491.0,
3773652.6,   393.3,   393.3,   0.0);
     (436401.5, 3773671.4,   393.4,   393.4,   0.0);   (436409.6,
3773671.4,   393.4,   393.4,   0.0);
     (436417.7, 3773671.4,   393.3,   393.3,   0.0);   (436425.9,
3773671.4,   393.4,   393.4,   0.0);
     (436434.0, 3773671.4,   393.4,   393.4,   0.0);   (436442.1,
3773671.4,   393.4,   393.4,   0.0);
     (436450.3, 3773671.4,   393.5,   393.5,   0.0);   (436458.4,
3773671.4,   393.6,   393.6,   0.0);
     (436466.6, 3773671.4,   393.7,   393.7,   0.0);   (436474.7,
3773671.4,   393.8,   393.8,   0.0);
     (436482.8, 3773671.4,   393.9,   393.9,   0.0);   (436491.0,

```
3773671.4,     393.9,     393.9,       0.0);
     ( 436401.5, 3773690.3,     394.0,     394.0,       0.0);         ( 436409.6,
3773690.3,     394.0,     394.0,       0.0);
     ( 436417.7, 3773690.3,     393.9,     393.9,       0.0);         ( 436425.9,
3773690.3,     393.9,     393.9,       0.0);
     ( 436434.0, 3773690.3,     394.0,     394.0,       0.0);         ( 436442.1,
3773690.3,     394.0,     394.0,       0.0);
     ( 436450.3, 3773690.3,     394.1,     394.1,       0.0);         ( 436458.4,
3773690.3,     394.2,     394.2,       0.0);
     ( 436466.6, 3773690.3,     394.3,     394.3,       0.0);         ( 436474.7,
3773690.3,     394.4,     394.4,       0.0);
     ( 436482.8, 3773690.3,     394.4,     394.4,       0.0);         ( 436491.0,
3773690.3,     394.5,     394.5,       0.0);
     ( 436401.5, 3773709.1,     394.7,     394.7,       0.0);         ( 436409.6,
3773709.1,     394.7,     394.7,       0.0);
     ( 436417.7, 3773709.1,     394.6,     394.6,       0.0);         ( 436425.9,
3773709.1,     394.6,     394.6,       0.0);
     ( 436434.0, 3773709.1,     394.6,     394.6,       0.0);         ( 436442.1,
3773709.1,     394.6,     394.6,       0.0);
     ( 436450.3, 3773709.1,     394.7,     394.7,       0.0);         ( 436458.4,
3773709.1,     394.8,     394.8,       0.0);
     ( 436466.6, 3773709.1,     394.9,     394.9,       0.0);         ( 436474.7,
3773709.1,     394.9,     394.9,       0.0);
     ( 436482.8, 3773709.1,     395.0,     395.0,       0.0);         ( 436491.0,
3773709.1,     395.0,     395.0,       0.0);
     ( 436401.5, 3773728.0,     395.4,     395.4,       0.0);         ( 436409.6,
3773728.0,     395.4,     395.4,       0.0);
     ( 436417.7, 3773728.0,     395.3,     395.3,       0.0);         ( 436425.9,
3773728.0,     395.3,     395.3,       0.0);
     ( 436434.0, 3773728.0,     395.3,     395.3,       0.0);         ( 436442.1,
3773728.0,     395.3,     395.3,       0.0);
     ( 436450.3, 3773728.0,     395.3,     395.3,       0.0);         ( 436458.4,
3773728.0,     395.4,     395.4,       0.0);
     ( 436466.6, 3773728.0,     395.5,     395.5,       0.0);         ( 436474.7,
3773728.0,     395.6,     395.6,       0.0);
     ( 436482.8, 3773728.0,     395.6,     395.6,       0.0);         ( 436491.0,
3773728.0,     395.7,     395.7,       0.0);
     ( 436401.5, 3773746.8,     396.1,     396.1,       0.0);         ( 436409.6,
3773746.8,     396.1,     396.1,       0.0);
     ( 436417.7, 3773746.8,     396.0,     396.0,       0.0);         ( 436425.9,
3773746.8,     396.0,     396.0,       0.0);
     ( 436434.0, 3773746.8,     396.0,     396.0,       0.0);         ( 436442.1,
3773746.8,     396.0,     396.0,       0.0);
     ( 436450.3, 3773746.8,     396.0,     396.0,       0.0);         ( 436458.4,
3773746.8,     396.1,     396.1,       0.0);
     ( 436466.6, 3773746.8,     396.2,     396.2,       0.0);         ( 436474.7,
3773746.8,     396.3,     396.3,       0.0);
     ( 436482.8, 3773746.8,     396.3,     396.3,       0.0);         ( 436491.0,
```

3773746.8, 396.4, 396.4, 0.0);
(436401.5, 3773765.7, 396.8, 396.8, 0.0); (436409.6, 3773765.7, 396.7, 396.7, 0.0);
(436417.7, 3773765.7, 396.7, 396.7, 0.0); (436425.9, 3773765.7, 396.7, 396.7, 0.0);
(436434.0, 3773765.7, 396.7, 396.7, 0.0); (436442.1, 3773765.7, 396.7, 396.7, 0.0);
(436450.3, 3773765.7, 396.8, 396.8, 0.0); (436458.4, 3773765.7, 396.9, 396.9, 0.0);
(436466.6, 3773765.7, 397.0, 397.0, 0.0); (436474.7, 3773765.7, 397.1, 397.1, 0.0);
(436482.8, 3773765.7, 397.1, 397.1, 0.0); (436491.0, 3773765.7, 397.1, 397.1, 0.0);
(436401.5, 3773784.5, 397.4, 397.4, 0.0); (436409.6, 3773784.5, 397.4, 397.4, 0.0);
(436417.7, 3773784.5, 397.4, 397.4, 0.0); (436425.9, 3773784.5, 397.4, 397.4, 0.0);
(436434.0, 3773784.5, 397.4, 397.4, 0.0); (436442.1, 3773784.5, 397.5, 397.5, 0.0);
(436450.3, 3773784.5, 397.5, 397.5, 0.0); (436458.4, 3773784.5, 397.6, 397.6, 0.0);

*** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

*** DISCRETE CARTESIAN RECEPTORS ***
(X-COORD, Y-COORD, ZELEV, ZHILL, ZFLAG)
(METERS)

(436466.6, 3773784.5, 397.8, 397.8, 0.0); (436474.7, 3773784.5, 397.8, 397.8, 0.0);
(436482.8, 3773784.5, 397.8, 397.8, 0.0); (436491.0, 3773784.5, 397.7, 397.7, 0.0);
(436401.5, 3773803.4, 398.1, 398.1, 0.0); (436409.6, 3773803.4, 398.1, 398.1, 0.0);
(436417.7, 3773803.4, 398.1, 398.1, 0.0); (436425.9, 3773803.4, 398.1, 398.1, 0.0);
(436434.0, 3773803.4, 398.1, 398.1, 0.0); (436442.1, 3773803.4, 398.1, 398.1, 0.0);
(436450.3, 3773803.4, 398.1, 398.1, 0.0); (436458.4, 3773803.4, 398.2, 398.2, 0.0);
(436466.6, 3773803.4, 398.2, 398.2, 0.0); (436474.7, 3773803.4, 398.2, 398.2, 0.0);
(436482.8, 3773803.4, 398.2, 398.2, 0.0); (436491.0,

3773803.4,   398.2,   398.2,   0.0);

*** METEOROLOGICAL DAYS SELECTED FOR PROCESSING ***

(1=YES; 0=NO)

1 1 1

Surface file: UPLA_V9_ADJU\UPLA_v9.SFC
Met Version: 16216
Profile file: UPLA_V9_ADJU\UPLA_v9.PFL

Surface format: FREE

Profile format: FREE

Surface station no.: 3102 Name: UNKNOWN Year: 2012
Upper air station no.: 3190 Name: UNKNOWN Year: 2012

First 24 hours of scalar data

YR	MO	DY	JDY	HR	H0	U*	W*	DT/DZ	ZICNV	ZIMCH	M-O LEN	Z0	BOWEN	ALBEDO	REF WS	WD	HT	REF TA	HT
12	01	01	1	01	-21.0	0.218	-9.000	-9.000	-999.	245.	52.4	0.34	1.15	1.00	1.80	351.	9.1	284.2	5.5
12	01	01	1	02	-21.0	0.218	-9.000	-9.000	-999.	245.	52.4	0.34	1.15	1.00	1.80	347.	9.1	284.2	5.5
12	01	01	1	03	-25.9	0.270	-9.000	-9.000	-999.	336.	79.9	0.34	1.15	1.00	2.20	340.	9.1	284.2	5.5
12	01	01	1	04	-20.9	0.218	-9.000	-9.000	-999.	246.	52.4	0.34	1.15	1.00	1.80	337.	9.1	285.4	5.5
12	01	01	1	05	-5.4	0.105	-9.000	-9.000	-999.	89.	18.5	0.34	1.15	1.00	0.90	344.	9.1	284.9	5.5
12	01	01	1	06	-11.5	0.154	-9.000	-9.000	-999.	145.	27.6	0.34	1.15	1.00	1.30	17.	9.1	283.1	5.5
12	01	01	1	07	-11.5	0.154	-9.000	-9.000	-999.	145.	27.6	0.34	1.15	1.00	1.30	326.	9.1	282.0	5.5
12	01	01	1	08	-10.1	0.156	-9.000	-9.000	-999.	147.	32.6	0.34	1.15	0.53	1.30	337.	9.1	284.9	5.5
12	01	01	1	09	42.1	0.096	0.369	0.015	42.	72.	-1.8	0.34	1.15	0.31	0.40	347.	9.1	291.4	5.5
12	01	01	1	10	102.2	0.280	0.715	0.005	125.	356.	-18.8	0.34	1.15	0.24	1.80	320.	9.1	296.4	5.5
12	01	01	1	11	143.5	0.233	1.110	0.005	333.	271.	-7.7	0.34	1.15	0.21	1.30	185.	9.1	297.5	5.5
12	01	01	1	12	162.2	0.188	1.407	0.005	600.	196.	-3.6	0.34	1.15	0.20	0.90	199.	9.1	298.1	5.5
12	01	01	1	13	158.3	0.187	1.641	0.005	974.	195.	-3.6	0.34	1.15	0.20	0.90	152.	9.1	299.9	5.5
12	01	01	1	14	131.9	0.288	1.687	0.005	1270.	370.	-15.7	0.34	1.15						

```
0.22    1.80  107.    9.1  301.4    5.5
 12 01 01   1 15   84.3  0.106  1.511  0.005 1427.  119.     -1.2  0.34   1.15
0.25    0.40  107.    9.1  302.0    5.5
 12 01 01   1 16   32.1  0.154  1.105  0.005 1463.  146.    -10.0  0.34   1.15
0.34    0.90  124.    9.1  302.0    5.5
 12 01 01   1 17  -10.6  0.155 -9.000 -9.000 -999.  146.     30.5  0.34   1.15
0.62    1.30  138.    9.1  299.9    5.5
 12 01 01   1 18  -20.4  0.219 -9.000 -9.000 -999.  245.     52.5  0.34   1.15
1.00    1.80  353.    9.1  293.1    5.5
 12 01 01   1 19 -999.0 -9.000 -9.000 -9.000 -999. -999. -99999.0  0.34   1.15
1.00  999.00  999.   -9.0  291.2    5.5
 12 01 01   1 20   -5.4  0.105 -9.000 -9.000 -999.   81.     18.6  0.34   1.15
1.00    0.90  308.    9.1  289.2    5.5
 12 01 01   1 21  -11.4  0.154 -9.000 -9.000 -999.  145.     27.9  0.34   1.15
1.00    1.30  339.    9.1  287.0    5.5
 12 01 01   1 22  -11.5  0.154 -9.000 -9.000 -999.  145.     27.8  0.34   1.15
1.00    1.30  339.    9.1  286.4    5.5
 12 01 01   1 23   -5.4  0.105 -9.000 -9.000 -999.   81.     18.5  0.34   1.15
1.00    0.90  336.    9.1  285.4    5.5
 12 01 01   1 24  -11.5  0.154 -9.000 -9.000 -999.  145.     27.7  0.34   1.15
1.00    1.30  338.    9.1  284.9    5.5


 First hour of profile data
 YR MO DY HR HEIGHT F  WDIR    WSPD AMB_TMP sigmaA  sigmaW  sigmaV
 12 01 01 01    5.5 0 -999.  -99.00   284.3   99.0  -99.00  -99.00
 12 01 01 01    9.1 1  351.    1.80  -999.0   99.0  -99.00  -99.00

 F indicates top of profile (=1) or below (=0)
 *** AERMOD - VERSION  19191 ***   *** C:\Lakes\AERMOD View\Bridge Upland\Bridge
Upland.isc                 ***       01/15/20
 *** AERMET - VERSION  16216 ***   ***
                         ***       13:48:55

                                   PAGE  58
 *** MODELOPTs:    RegDFAULT  CONC  ELEV  URBAN  ADJ_U*

                   *** THE ANNUAL AVERAGE CONCENTRATION    VALUES AVERAGED OVER   5
YEARS FOR SOURCE GROUP: ALL      ***
                                    INCLUDING SOURCE(S):     L0001543    , L0001544
 , L0001545    , L0001546    , L0001547    ,
                   L0001548    , L0001549    , L0001550    , L0001551    , L0001552
 , L0001553    , L0001554    , L0001555    ,
                   L0001556    , L0001557    , L0001558    , L0001559    , L0001560
 , L0001561    , L0001562    , L0001563    ,
                   L0001564    , L0001565    , L0001566    , L0001567    , L0001568
 , L0001569    , L0001570    ,  . . .      ,
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Bridge Upland.ADO
*** NETWORK ID: UCART1 ; NETWORK TYPE: GRIDCART ***

** CONC OF PM_10 IN MICROGRAMS/M**3 **

Y-COORD (METERS)	X-COORD (METERS)									
	437205.06	437217.73	437230.40	437243.07	437255.74	437268.41	437281.08	437293.75	437306.42	
3774010.17	0.00006	0.00006	0.00006	0.00006	0.00006	0.00006	0.00006	0.00006	0.00006	
3773980.87	0.00007	0.00006	0.00006	0.00006	0.00006	0.00006	0.00006	0.00006	0.00006	
3773951.57	0.00007	0.00006	0.00006	0.00006	0.00006	0.00006	0.00006	0.00006	0.00006	
3773922.27	0.00007	0.00006	0.00006	0.00006	0.00006	0.00006	0.00006	0.00006	0.00006	
3773892.97	0.00007	0.00006	0.00006	0.00006	0.00006	0.00006	0.00006	0.00006	0.00006	
3773863.67	0.00007	0.00007	0.00006	0.00006	0.00006	0.00006	0.00006	0.00006	0.00006	
3773834.37	0.00007	0.00007	0.00006	0.00006	0.00006	0.00006	0.00006	0.00006	0.00006	
3773805.07	0.00007	0.00007	0.00006	0.00006	0.00006	0.00006	0.00006	0.00006	0.00006	
3773775.77	0.00007	0.00007	0.00006	0.00006	0.00006	0.00006	0.00006	0.00006	0.00006	
3773746.47	0.00007	0.00007	0.00007	0.00006	0.00006	0.00006	0.00006	0.00006	0.00006	
3773717.17	0.00007	0.00007	0.00007	0.00006	0.00006	0.00006	0.00006	0.00006	0.00006	
3773687.87	0.00007	0.00007	0.00007	0.00006	0.00006	0.00006	0.00006	0.00006	0.00006	
3773658.57	0.00007	0.00007	0.00007	0.00006	0.00006	0.00006	0.00006	0.00006	0.00006	
3773629.27	0.00007	0.00007	0.00007	0.00006	0.00006	0.00006	0.00006	0.00006	0.00006	
3773599.97	0.00007	0.00007	0.00007	0.00006	0.00006	0.00006	0.00006	0.00006	0.00006	
3773570.67	0.00007	0.00007	0.00007	0.00006	0.00006	0.00006	0.00006	0.00006	0.00006	
3773541.37	0.00007	0.00007	0.00007	0.00006	0.00006	0.00006	0.00006	0.00006	0.00006	
3773512.07	0.00007	0.00007	0.00007	0.00007	0.00006	0.00006	0.00006	0.00006	0.00006	

```
  3773482.77 |       0.00007      0.00007      0.00007      0.00007      0.00006
  0.00006      0.00006      0.00006      0.00006
  3773453.47 |       0.00007      0.00007      0.00007      0.00007      0.00006
  0.00006      0.00006      0.00006      0.00006
  3773424.17 |       0.00007      0.00007      0.00007      0.00007      0.00006
  0.00006      0.00006      0.00006      0.00006
```



```
 *** MODELOPTs:    RegDFAULT  CONC  ELEV  URBAN  ADJ_U*

                  *** THE ANNUAL AVERAGE CONCENTRATION    VALUES AVERAGED OVER   5
YEARS FOR SOURCE GROUP: ALL      ***
                                   INCLUDING SOURCE(S):     L0001543    , L0001544
 , L0001545    , L0001546    , L0001547    ,
                    L0001548    , L0001549    , L0001550    , L0001551    , L0001552
 , L0001553    , L0001554    , L0001555    ,
                    L0001556    , L0001557    , L0001558    , L0001559    , L0001560
 , L0001561    , L0001562    , L0001563    ,
                    L0001564    , L0001565    , L0001566    , L0001567    , L0001568
 , L0001569    , L0001570    ,  . . .      ,

                                   *** NETWORK ID: UCART1   ;  NETWORK TYPE:
GRIDCART ***

                                        ** CONC OF PM_10    IN MICROGRAMS/M**3
                    **

    Y-COORD  |                                              X-COORD (METERS)
    (METERS) |     437319.09    437331.76    437344.43    437357.10    437369.77
437382.44    437395.11    437407.78    437420.45
 - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
- - - - - - - - - - - - - - - - - - - - - - - - - - - -

  3774010.17 |       0.00006      0.00006      0.00006      0.00005      0.00005
  0.00005      0.00005      0.00005      0.00005
  3773980.87 |       0.00006      0.00006      0.00006      0.00005      0.00005
  0.00005      0.00005      0.00005      0.00005
  3773951.57 |       0.00006      0.00006      0.00006      0.00005      0.00005
  0.00005      0.00005      0.00005      0.00005
  3773922.27 |       0.00006      0.00006      0.00006      0.00005      0.00005
  0.00005      0.00005      0.00005      0.00005
  3773892.97 |       0.00006      0.00006      0.00006      0.00005      0.00005
  0.00005      0.00005      0.00005      0.00005
  3773863.67 |       0.00006      0.00006      0.00006      0.00005      0.00005
```

```
  0.00005      0.00005      0.00005      0.00005
  3773834.37 |       0.00006      0.00006      0.00006      0.00006      0.00005
  0.00005      0.00005      0.00005      0.00005
  3773805.07 |       0.00006      0.00006      0.00006      0.00006      0.00005
  0.00005      0.00005      0.00005      0.00005
  3773775.77 |       0.00006      0.00006      0.00006      0.00006      0.00006
  0.00005      0.00005      0.00005      0.00005
  3773746.47 |       0.00006      0.00006      0.00006      0.00006      0.00006
  0.00005      0.00005      0.00005      0.00005
  3773717.17 |       0.00006      0.00006      0.00006      0.00006      0.00006
  0.00005      0.00005      0.00005      0.00005
  3773687.87 |       0.00006      0.00006      0.00006      0.00006      0.00006
  0.00005      0.00005      0.00005      0.00005
  3773658.57 |       0.00006      0.00006      0.00006      0.00006      0.00006
  0.00005      0.00005      0.00005      0.00005
  3773629.27 |       0.00006      0.00006      0.00006      0.00006      0.00006
  0.00006      0.00005      0.00005      0.00005
  3773599.97 |       0.00006      0.00006      0.00006      0.00006      0.00006
  0.00006      0.00005      0.00005      0.00005
  3773570.67 |       0.00006      0.00006      0.00006      0.00006      0.00006
  0.00006      0.00005      0.00005      0.00005
  3773541.37 |       0.00006      0.00006      0.00006      0.00006      0.00006
  0.00006      0.00005      0.00005      0.00005
  3773512.07 |       0.00006      0.00006      0.00006      0.00006      0.00006
  0.00006      0.00005      0.00005      0.00005
  3773482.77 |       0.00006      0.00006      0.00006      0.00006      0.00006
  0.00006      0.00006      0.00005      0.00005
  3773453.47 |       0.00006      0.00006      0.00006      0.00006      0.00006
  0.00006      0.00006      0.00005      0.00005
  3773424.17 |       0.00006      0.00006      0.00006      0.00006      0.00006
  0.00006      0.00006      0.00005      0.00005
```



```
 *** MODELOPTs:    RegDFAULT  CONC  ELEV  URBAN  ADJ_U*

                    *** THE ANNUAL AVERAGE CONCENTRATION    VALUES AVERAGED OVER   5
YEARS FOR SOURCE GROUP: ALL      ***
                                    INCLUDING SOURCE(S):     L0001543    , L0001544
 , L0001545    , L0001546    , L0001547    ,
                   L0001548    , L0001549    , L0001550    , L0001551    , L0001552
 , L0001553    , L0001554    , L0001555    ,
                   L0001556    , L0001557    , L0001558    , L0001559    , L0001560
 , L0001561    , L0001562    , L0001563    ,
                   L0001564    , L0001565    , L0001566    , L0001567    , L0001568
```

 , L0001569   , L0001570   , . . .   ,

*** NETWORK ID: UCART1   ; NETWORK TYPE:
GRIDCART ***

** CONC OF PM_10   IN MICROGRAMS/M**3
**

Y-COORD (METERS)	X-COORD (METERS)		
	437433.12	437445.79	437458.46
3774010.17	0.00005	0.00005	0.00005
3773980.87	0.00005	0.00005	0.00005
3773951.57	0.00005	0.00005	0.00005
3773922.27	0.00005	0.00005	0.00005
3773892.97	0.00005	0.00005	0.00005
3773863.67	0.00005	0.00005	0.00005
3773834.37	0.00005	0.00005	0.00005
3773805.07	0.00005	0.00005	0.00005
3773775.77	0.00005	0.00005	0.00005
3773746.47	0.00005	0.00005	0.00005
3773717.17	0.00005	0.00005	0.00005
3773687.87	0.00005	0.00005	0.00005
3773658.57	0.00005	0.00005	0.00005
3773629.27	0.00005	0.00005	0.00005
3773599.97	0.00005	0.00005	0.00005
3773570.67	0.00005	0.00005	0.00005
3773541.37	0.00005	0.00005	0.00005
3773512.07	0.00005	0.00005	0.00005
3773482.77	0.00005	0.00005	0.00005
3773453.47	0.00005	0.00005	0.00005
3773424.17	0.00005	0.00005	0.00005

 *** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

*** THE ANNUAL AVERAGE CONCENTRATION   VALUES AVERAGED OVER   5
YEARS FOR SOURCE GROUP: ALL   ***
INCLUDING SOURCE(S):   L0001543   , L0001544
 , L0001545   , L0001546   , L0001547   ,
L0001548   , L0001549   , L0001550   , L0001551   , L0001552
 , L0001553   , L0001554   , L0001555   ,

L0001556 , L0001557 , L0001558 , L0001559 , L0001560
, L0001561 , L0001562 , L0001563 ,
L0001564 , L0001565 , L0001566 , L0001567 , L0001568
, L0001569 , L0001570 , . . . ,

*** NETWORK ID: UCART2 ; NETWORK TYPE:
GRIDCART ***

** CONC OF PM_10 IN MICROGRAMS/M**3
**

Y-COORD (METERS)	X-COORD (METERS)									
	437338.99	437349.41	437359.83	437370.25	437380.67	437391.09	437401.51	437411.93	437422.35	
3774609.52	0.00005	0.00005	0.00005	0.00005	0.00004	0.00004	0.00004	0.00004	0.00004	
3774590.75	0.00005	0.00005	0.00005	0.00004	0.00004	0.00004	0.00004	0.00004	0.00004	
3774571.98	0.00005	0.00005	0.00005	0.00005	0.00004	0.00004	0.00004	0.00004	0.00004	
3774553.21	0.00005	0.00005	0.00005	0.00005	0.00005	0.00004	0.00004	0.00004	0.00004	
3774534.44	0.00005	0.00005	0.00005	0.00005	0.00005	0.00005	0.00004	0.00004	0.00004	
3774515.67	0.00005	0.00005	0.00005	0.00005	0.00005	0.00005	0.00005	0.00004	0.00004	
3774496.90	0.00005	0.00005	0.00005	0.00005	0.00005	0.00005	0.00005	0.00004	0.00004	
3774478.13	0.00005	0.00005	0.00005	0.00005	0.00005	0.00005	0.00005	0.00005	0.00004	
3774459.36	0.00005	0.00005	0.00005	0.00005	0.00005	0.00005	0.00005	0.00005	0.00004	
3774440.59	0.00005	0.00005	0.00005	0.00005	0.00005	0.00005	0.00005	0.00005	0.00005	
3774421.82	0.00005	0.00005	0.00005	0.00005	0.00005	0.00005	0.00005	0.00005	0.00005	
3774403.05	0.00005	0.00005	0.00005	0.00005	0.00005	0.00005	0.00005	0.00005	0.00005	
3774384.28	0.00005	0.00005	0.00005	0.00005	0.00005	0.00005	0.00005	0.00005	0.00005	
3774365.51	0.00005	0.00005	0.00005	0.00005	0.00005	0.00005	0.00005	0.00005	0.00005	
3774346.74	0.00005	0.00005	0.00005	0.00005	0.00005	0.00005	0.00005	0.00005	0.00005	
3774327.97	0.00005	0.00005	0.00005	0.00005	0.00005					

```
  0.00005      0.00005      0.00005      0.00005
  3774309.20 |       0.00005      0.00005      0.00005      0.00005      0.00005
  0.00005      0.00005      0.00005      0.00005
  3774290.43 |       0.00005      0.00005      0.00005      0.00005      0.00005
  0.00005      0.00005      0.00005      0.00005
  3774271.66 |       0.00005      0.00005      0.00005      0.00005      0.00005
  0.00005      0.00005      0.00005      0.00005
  3774252.89 |       0.00005      0.00005      0.00005      0.00005      0.00005
  0.00005      0.00005      0.00005      0.00005
  3774234.12 |       0.00005      0.00005      0.00005      0.00005      0.00005
  0.00005      0.00005      0.00005      0.00005
```



```
 *** MODELOPTs:    RegDFAULT  CONC  ELEV  URBAN  ADJ_U*

                   *** THE ANNUAL AVERAGE CONCENTRATION    VALUES AVERAGED OVER   5 YEARS FOR SOURCE GROUP: ALL      ***
                                    INCLUDING SOURCE(S):     L0001543    , L0001544
 , L0001545    , L0001546    , L0001547    ,
                     L0001548    , L0001549    , L0001550    , L0001551    , L0001552
 , L0001553    , L0001554    , L0001555    ,
                     L0001556    , L0001557    , L0001558    , L0001559    , L0001560
 , L0001561    , L0001562    , L0001563    ,
                     L0001564    , L0001565    , L0001566    , L0001567    , L0001568
 , L0001569    , L0001570    ,  . . .      ,

                                    *** NETWORK ID: UCART2   ;  NETWORK TYPE:  GRIDCART ***

                                        ** CONC OF PM_10    IN MICROGRAMS/M**3
                     **

    Y-COORD  |                                              X-COORD (METERS)
    (METERS) |     437432.77    437443.19    437453.61    437464.03    437474.45
437484.87    437495.29    437505.71    437516.13
 - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
- - - - - - - - - - - - - - - - - - - - - - - - - - - - -

  3774609.52 |       0.00004      0.00004      0.00004      0.00004      0.00004
  0.00004      0.00004      0.00004      0.00004
  3774590.75 |       0.00004      0.00004      0.00004      0.00004      0.00004
  0.00004      0.00004      0.00004      0.00004
  3774571.98 |       0.00004      0.00004      0.00004      0.00004      0.00004
  0.00004      0.00004      0.00004      0.00004
```

3774553.21	0.00004	0.00004	0.00004	0.00004	0.00004
0.00004	0.00004	0.00004	0.00004		
3774534.44	0.00004	0.00004	0.00004	0.00004	0.00004
0.00004	0.00004	0.00004	0.00004		
3774515.67	0.00004	0.00004	0.00004	0.00004	0.00004
0.00004	0.00004	0.00004	0.00004		
3774496.90	0.00004	0.00004	0.00004	0.00004	0.00004
0.00004	0.00004	0.00004	0.00004		
3774478.13	0.00004	0.00004	0.00004	0.00004	0.00004
0.00004	0.00004	0.00004	0.00004		
3774459.36	0.00004	0.00004	0.00004	0.00004	0.00004
0.00004	0.00004	0.00004	0.00004		
3774440.59	0.00004	0.00004	0.00004	0.00004	0.00004
0.00004	0.00004	0.00004	0.00004		
3774421.82	0.00004	0.00004	0.00004	0.00004	0.00004
0.00004	0.00004	0.00004	0.00004		
3774403.05	0.00004	0.00004	0.00004	0.00004	0.00004
0.00004	0.00004	0.00004	0.00004		
3774384.28	0.00004	0.00004	0.00004	0.00004	0.00004
0.00004	0.00004	0.00004	0.00004		
3774365.51	0.00005	0.00004	0.00004	0.00004	0.00004
0.00004	0.00004	0.00004	0.00004		
3774346.74	0.00005	0.00004	0.00004	0.00004	0.00004
0.00004	0.00004	0.00004	0.00004		
3774327.97	0.00005	0.00005	0.00004	0.00004	0.00004
0.00004	0.00004	0.00004	0.00004		
3774309.20	0.00005	0.00005	0.00004	0.00004	0.00004
0.00004	0.00004	0.00004	0.00004		
3774290.43	0.00005	0.00005	0.00005	0.00004	0.00004
0.00004	0.00004	0.00004	0.00004		
3774271.66	0.00005	0.00005	0.00005	0.00004	0.00004
0.00004	0.00004	0.00004	0.00004		
3774252.89	0.00005	0.00005	0.00005	0.00005	0.00004
0.00004	0.00004	0.00004	0.00004		
3774234.12	0.00005	0.00005	0.00005	0.00005	0.00004
0.00004	0.00004	0.00004	0.00004		

*** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

*** THE ANNUAL AVERAGE CONCENTRATION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): L0001543 , L0001544 , L0001545 , L0001546 , L0001547 ,

```
                L0001548    , L0001549    , L0001550    , L0001551    , L0001552
 , L0001553    , L0001554    , L0001555    ,
                L0001556    , L0001557    , L0001558    , L0001559    , L0001560
 , L0001561    , L0001562    , L0001563    ,
                L0001564    , L0001565    , L0001566    , L0001567    , L0001568
 , L0001569    , L0001570    ,  . . .      ,

                                  *** NETWORK ID: UCART2   ;  NETWORK TYPE:
GRIDCART ***

                                       ** CONC OF PM_10    IN MICROGRAMS/M**3
                   **

    Y-COORD  |                                                 X-COORD (METERS)
    (METERS) |     437526.55    437536.97    437547.39
 - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
- - - - - - - - - - - - - - - - - - - - - - - - - - - - -

  3774609.52 |       0.00004      0.00004      0.00004
  3774590.75 |       0.00004      0.00004      0.00004
  3774571.98 |       0.00004      0.00004      0.00004
  3774553.21 |       0.00004      0.00004      0.00004
  3774534.44 |       0.00004      0.00004      0.00004
  3774515.67 |       0.00004      0.00004      0.00004
  3774496.90 |       0.00004      0.00004      0.00004
  3774478.13 |       0.00004      0.00004      0.00004
  3774459.36 |       0.00004      0.00004      0.00004
  3774440.59 |       0.00004      0.00004      0.00004
  3774421.82 |       0.00004      0.00004      0.00004
  3774403.05 |       0.00004      0.00004      0.00004
  3774384.28 |       0.00004      0.00004      0.00004
  3774365.51 |       0.00004      0.00004      0.00004
  3774346.74 |       0.00004      0.00004      0.00004
  3774327.97 |       0.00004      0.00004      0.00004
  3774309.20 |       0.00004      0.00004      0.00004
  3774290.43 |       0.00004      0.00004      0.00004
  3774271.66 |       0.00004      0.00004      0.00004
  3774252.89 |       0.00004      0.00004      0.00004
  3774234.12 |       0.00004      0.00004      0.00004
```

YEARS FOR SOURCE GROUP: ALL ***

INCLUDING SOURCE(S): L0001543 , L0001544 , L0001545 , L0001546 , L0001547 , L0001548 , L0001549 , L0001550 , L0001551 , L0001552 , L0001553 , L0001554 , L0001555 , L0001556 , L0001557 , L0001558 , L0001559 , L0001560 , L0001561 , L0001562 , L0001563 , L0001564 , L0001565 , L0001566 , L0001567 , L0001568 , L0001569 , L0001570 , . . . ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF PM_10 IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD (M)	CONC
436490.76	3772888.65	0.00042	436520.76	3772888.65	0.00034
436550.76	3772888.65	0.00028	436610.76	3772888.65	0.00022
436640.76	3772888.65	0.00019	436670.76	3772888.65	0.00018
436700.76	3772888.65	0.00016	436490.76	3772918.65	0.00042
436520.76	3772918.65	0.00034	436550.76	3772918.65	0.00028
436610.76	3772918.65	0.00022	436640.76	3772918.65	0.00019
436670.76	3772918.65	0.00018	436700.76	3772918.65	0.00016
436610.76	3772948.65	0.00022	436640.76	3772948.65	0.00019
436670.76	3772948.65	0.00018	436700.76	3772948.65	0.00016
436550.76	3772978.65	0.00029	436580.76	3772978.65	0.00025
436610.76	3772978.65	0.00022	436640.76	3772978.65	0.00019
436670.76	3772978.65	0.00018	436700.76	3772978.65	0.00016
436550.76	3773008.65	0.00029	436580.76	3773008.65	0.00025
436610.76	3773008.65	0.00022	436640.76	3773008.65	0.00020

```
         436670.76    3773008.65        0.00018                    436700.76
3773008.65        0.00016
         436610.76    3773038.65        0.00022                    436640.76
3773038.65        0.00020
         436670.76    3773038.65        0.00018                    436700.76
3773038.65        0.00016
         436610.76    3773068.65        0.00022                    436640.76
3773068.65        0.00020
         436670.76    3773068.65        0.00018                    436700.76
3773068.65        0.00016
         436100.76    3773098.65        0.00016                    436130.76
3773098.65        0.00018
         436160.76    3773098.65        0.00020                    436190.76
3773098.65        0.00022
         436220.76    3773098.65        0.00026                    436610.76
3773098.65        0.00022
         436640.76    3773098.65        0.00020                    436670.76
3773098.65        0.00018
         436700.76    3773098.65        0.00016                    436100.76
3773128.65        0.00016
         436130.76    3773128.65        0.00018                    436160.76
3773128.65        0.00020
         436190.76    3773128.65        0.00022                    436220.76
3773128.65        0.00026
         436250.76    3773128.65        0.00031                    436100.76
3773158.65        0.00016
         436130.76    3773158.65        0.00018                    436160.76
3773158.65        0.00020
         436190.76    3773158.65        0.00022                    436220.76
3773158.65        0.00026
         436250.76    3773158.65        0.00031                    436520.76
3773158.65        0.00034
         436550.76    3773158.65        0.00029                    436580.76
3773158.65        0.00025
         436610.76    3773158.65        0.00022                    436640.76
3773158.65        0.00020
         436670.76    3773158.65        0.00018                    436100.76
3773188.65        0.00016
         436130.76    3773188.65        0.00018                    436160.76
3773188.65        0.00020
         436190.76    3773188.65        0.00022                    436220.76
3773188.65        0.00026
         436250.76    3773188.65        0.00031                    436400.76
3773188.65        0.00184
         436430.76    3773188.65        0.00085                    436460.76
3773188.65        0.00056
         436490.76    3773188.65        0.00042                    436520.76
3773188.65        0.00034
```

436550.76 3773188.65 0.00029 436580.76 3773188.65 0.00025
436610.76 3773188.65 0.00022 436640.76 3773188.65 0.00020

*** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

*** THE ANNUAL AVERAGE CONCENTRATION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): L0001543 , L0001544 , L0001545 , L0001546 , L0001547 ,
L0001548 , L0001549 , L0001550 , L0001551 , L0001552 , L0001553 , L0001554 , L0001555 ,
L0001556 , L0001557 , L0001558 , L0001559 , L0001560 , L0001561 , L0001562 , L0001563 ,
L0001564 , L0001565 , L0001566 , L0001567 , L0001568 , L0001569 , L0001570 , . . . ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF PM_10 IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD (M)	CONC
436670.76	3773188.65	0.00018	436100.76	3773218.65	0.00016
436130.76	3773218.65	0.00018	436160.76	3773218.65	0.00020
436190.76	3773218.65	0.00022	436220.76	3773218.65	0.00026
436250.76	3773218.65	0.00031	436280.76	3773218.65	0.00039
436310.76	3773218.65	0.00052	436340.76	3773218.65	0.00079
436370.76	3773218.65	0.00180	436400.76	3773218.65	0.00185
436430.76	3773218.65	0.00085	436460.76	3773218.65	0.00056
436490.76	3773218.65	0.00043	436520.76		

3773218.65 0.00034
436550.76 3773218.65 0.00029 436580.76
3773218.65 0.00025
436610.76 3773218.65 0.00022 436640.76
3773218.65 0.00020
436670.76 3773218.65 0.00018 436100.76
3773248.65 0.00016
436130.76 3773248.65 0.00018 436160.76
3773248.65 0.00020
436190.76 3773248.65 0.00022 436220.76
3773248.65 0.00026
436250.76 3773248.65 0.00031 436280.76
3773248.65 0.00039
436310.76 3773248.65 0.00052 436340.76
3773248.65 0.00079
436370.76 3773248.65 0.00179 436400.76
3773248.65 0.00186
436430.76 3773248.65 0.00085 436460.76
3773248.65 0.00056
436490.76 3773248.65 0.00043 436520.76
3773248.65 0.00034
436550.76 3773248.65 0.00029 436580.76
3773248.65 0.00025
436610.76 3773248.65 0.00022 436640.76
3773248.65 0.00020
436670.76 3773248.65 0.00018 436100.76
3773278.65 0.00016
436130.76 3773278.65 0.00018 436160.76
3773278.65 0.00020
436190.76 3773278.65 0.00022 436220.76
3773278.65 0.00026
436250.76 3773278.65 0.00031 436280.76
3773278.65 0.00039
436310.76 3773278.65 0.00052 436340.76
3773278.65 0.00079
436370.76 3773278.65 0.00177 436400.76
3773278.65 0.00187
436430.76 3773278.65 0.00086 436460.76
3773278.65 0.00057
436490.76 3773278.65 0.00043 436520.76
3773278.65 0.00034
436550.76 3773278.65 0.00029 436580.76
3773278.65 0.00025
436610.76 3773278.65 0.00022 436640.76
3773278.65 0.00020
436670.76 3773278.65 0.00018 436100.76
3773308.65 0.00016
436130.76 3773308.65 0.00018 436160.76

3773308.65 0.00020
436190.76 3773308.65 0.00022 436220.76
3773308.65 0.00026
436250.76 3773308.65 0.00031 436280.76
3773308.65 0.00039
436310.76 3773308.65 0.00052 436340.76
3773308.65 0.00079
436370.76 3773308.65 0.00176 436400.76
3773308.65 0.00187
436430.76 3773308.65 0.00086 436460.76
3773308.65 0.00056
436490.76 3773308.65 0.00043 436520.76
3773308.65 0.00034
436550.76 3773308.65 0.00029 436580.76
3773308.65 0.00025
436610.76 3773308.65 0.00022 436640.76
3773308.65 0.00020

*** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

*** THE ANNUAL AVERAGE CONCENTRATION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): L0001543 , L0001544 , L0001545 , L0001546 , L0001547 ,
L0001548 , L0001549 , L0001550 , L0001551 , L0001552 , L0001553 , L0001554 , L0001555 ,
L0001556 , L0001557 , L0001558 , L0001559 , L0001560 , L0001561 , L0001562 , L0001563 ,
L0001564 , L0001565 , L0001566 , L0001567 , L0001568 , L0001569 , L0001570 , . . . ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF PM_10 IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD (M)	CONC
436670.76	3773308.65	0.00018	436100.76	3773338.65	0.00016

```
         436130.76    3773338.65        0.00018                    436160.76
3773338.65        0.00020
         436190.76    3773338.65        0.00022                    436220.76
3773338.65        0.00026
         436250.76    3773338.65        0.00031                    436280.76
3773338.65        0.00039
         436310.76    3773338.65        0.00052                    436340.76
3773338.65        0.00079
         436370.76    3773338.65        0.00175                    436400.76
3773338.65        0.00188
         436430.76    3773338.65        0.00086                    436460.76
3773338.65        0.00056
         436490.76    3773338.65        0.00043                    436520.76
3773338.65        0.00034
         436550.76    3773338.65        0.00029                    436580.76
3773338.65        0.00025
         436610.76    3773338.65        0.00022                    436640.76
3773338.65        0.00020
         436670.76    3773338.65        0.00018                    436100.76
3773368.65        0.00016
         436130.76    3773368.65        0.00017                    436160.76
3773368.65        0.00020
         436190.76    3773368.65        0.00022                    436220.76
3773368.65        0.00026
         436250.76    3773368.65        0.00031                    436280.76
3773368.65        0.00039
         436310.76    3773368.65        0.00051                    436340.76
3773368.65        0.00078
         436370.76    3773368.65        0.00173                    436400.76
3773368.65        0.00189
         436430.76    3773368.65        0.00086                    436460.76
3773368.65        0.00057
         436490.76    3773368.65        0.00043                    436520.76
3773368.65        0.00034
         436550.76    3773368.65        0.00029                    436580.76
3773368.65        0.00025
         436610.76    3773368.65        0.00022                    436640.76
3773368.65        0.00020
         436670.76    3773368.65        0.00018                    436100.76
3773398.65        0.00016
         436130.76    3773398.65        0.00017                    436160.76
3773398.65        0.00020
         436190.76    3773398.65        0.00022                    436220.76
3773398.65        0.00026
         436250.76    3773398.65        0.00031                    436280.76
3773398.65        0.00038
         436310.76    3773398.65        0.00051                    436340.76
3773398.65        0.00078
```

```
         436370.76    3773398.65        0.00173                        436400.76
3773398.65        0.00190
         436430.76    3773398.65        0.00086                        436460.76
3773398.65        0.00057
         436490.76    3773398.65        0.00043                        436520.76
3773398.65        0.00034
         436550.76    3773398.65        0.00029                        436580.76
3773398.65        0.00025
         436610.76    3773398.65        0.00022                        436640.76
3773398.65        0.00020
         436670.76    3773398.65        0.00018                        437509.68
3774019.01        0.00005
         437522.02    3774019.01        0.00005                        437534.36
3774019.01        0.00004
         437546.70    3774019.01        0.00004                        437559.04
3774019.01        0.00004
         437509.68    3774027.34        0.00005                        437522.02
3774027.34        0.00005
         437534.36    3774027.34        0.00004                        437546.70
3774027.34        0.00004
         437559.04    3774027.34        0.00004                        437509.68
3774035.67        0.00005
         437522.02    3774035.67        0.00004                        437534.36
3774035.67        0.00004
         437546.70    3774035.67        0.00004                        437559.04
3774035.67        0.00004
         437509.68    3774044.00        0.00005                        437522.02
3774044.00        0.00004
         437534.36    3774044.00        0.00004                        437546.70
3774044.00        0.00004
```



```
 *** MODELOPTs:    RegDFAULT  CONC  ELEV  URBAN  ADJ_U*

                   *** THE ANNUAL AVERAGE CONCENTRATION    VALUES AVERAGED OVER   5
YEARS FOR SOURCE GROUP: ALL      ***
                                    INCLUDING SOURCE(S):     L0001543    , L0001544
 , L0001545    , L0001546    , L0001547    ,
                   L0001548    , L0001549    , L0001550    , L0001551    , L0001552
 , L0001553    , L0001554    , L0001555    ,
                   L0001556    , L0001557    , L0001558    , L0001559    , L0001560
 , L0001561    , L0001562    , L0001563    ,
                   L0001564    , L0001565    , L0001566    , L0001567    , L0001568
 , L0001569    , L0001570    ,  . . .      ,
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*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF PM_10 IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD (M)	CONC
437559.04	3774044.00	0.00004	437509.68	3774052.33	0.00005
437522.02	3774052.33	0.00004	437534.36	3774052.33	0.00004
437546.70	3774052.33	0.00004	437559.04	3774052.33	0.00004
437509.68	3774060.66	0.00005	437522.02	3774060.66	0.00004
437534.36	3774060.66	0.00004	437546.70	3774060.66	0.00004
437559.04	3774060.66	0.00004	437509.68	3774068.99	0.00005
437522.02	3774068.99	0.00004	437534.36	3774068.99	0.00004
437546.70	3774068.99	0.00004	437559.04	3774068.99	0.00004
437509.68	3774077.32	0.00005	437522.02	3774077.32	0.00004
437534.36	3774077.32	0.00004	437546.70	3774077.32	0.00004
437559.04	3774077.32	0.00004	437509.68	3774085.65	0.00005
437522.02	3774085.65	0.00004	437534.36	3774085.65	0.00004
437546.70	3774085.65	0.00004	437559.04	3774085.65	0.00004
437509.68	3774093.98	0.00005	437522.02	3774093.98	0.00004
437534.36	3774093.98	0.00004	437546.70	3774093.98	0.00004
437559.04	3774093.98	0.00004	437509.68	3774102.31	0.00004
437522.02	3774102.31	0.00004	437534.36	3774102.31	0.00004
437546.70	3774102.31	0.00004	437559.04	3774102.31	0.00004
437509.68	3774110.64	0.00004	437522.02		

```
3774110.64        0.00004
         437534.36    3774110.64        0.00004                    437546.70
3774110.64        0.00004
         437559.04    3774110.64        0.00004                    437571.38
3774110.64        0.00004
         437583.72    3774110.64        0.00004                    437596.06
3774110.64        0.00004
         437608.40    3774110.64        0.00004                    437620.74
3774110.64        0.00004
         437633.08    3774110.64        0.00004                    437645.42
3774110.64        0.00004
         437657.76    3774110.64        0.00004                    437670.10
3774110.64        0.00004
         437682.44    3774110.64        0.00004                    437694.78
3774110.64        0.00004
         437707.12    3774110.64        0.00004                    437719.46
3774110.64        0.00004
         437731.80    3774110.64        0.00004                    437744.14
3774110.64        0.00004
         437756.48    3774110.64        0.00004                    437509.68
3774118.97        0.00004
         437522.02    3774118.97        0.00004                    437534.36
3774118.97        0.00004
         437546.70    3774118.97        0.00004                    437559.04
3774118.97        0.00004
         437571.38    3774118.97        0.00004                    437583.72
3774118.97        0.00004
         437596.06    3774118.97        0.00004                    437608.40
3774118.97        0.00004
         437620.74    3774118.97        0.00004                    437633.08
3774118.97        0.00004
         437645.42    3774118.97        0.00004                    437657.76
3774118.97        0.00004
         437670.10    3774118.97        0.00004                    437682.44
3774118.97        0.00004
         437694.78    3774118.97        0.00004                    437707.12
3774118.97        0.00004
         437719.46    3774118.97        0.00004                    437731.80
3774118.97        0.00004
         437744.14    3774118.97        0.00004                    437756.48
3774118.97        0.00004
         437509.68    3774127.30        0.00004                    437522.02
3774127.30        0.00004
 *** AERMOD - VERSION  19191 ***   *** C:\Lakes\AERMOD View\Bridge Upland\Bridge
Upland.isc                  ***        01/15/20
 *** AERMET - VERSION  16216 ***   ***
                          ***       13:48:55
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*** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

*** THE ANNUAL AVERAGE CONCENTRATION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): L0001543 , L0001544 , L0001545 , L0001546 , L0001547 ,
L0001548 , L0001549 , L0001550 , L0001551 , L0001552 , L0001553 , L0001554 , L0001555 ,
L0001556 , L0001557 , L0001558 , L0001559 , L0001560 , L0001561 , L0001562 , L0001563 ,
L0001564 , L0001565 , L0001566 , L0001567 , L0001568 , L0001569 , L0001570 , . . . ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF PM_10 IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD (M)	CONC
437534.36	3774127.30	0.00004	437546.70	3774127.30	0.00004
437559.04	3774127.30	0.00004	437571.38	3774127.30	0.00004
437583.72	3774127.30	0.00004	437596.06	3774127.30	0.00004
437608.40	3774127.30	0.00004	437620.74	3774127.30	0.00004
437633.08	3774127.30	0.00004	437645.42	3774127.30	0.00004
437657.76	3774127.30	0.00004	437670.10	3774127.30	0.00004
437682.44	3774127.30	0.00004	437694.78	3774127.30	0.00004
437707.12	3774127.30	0.00004	437719.46	3774127.30	0.00004
437731.80	3774127.30	0.00004	437744.14	3774127.30	0.00004
437756.48	3774127.30	0.00004	437509.68	3774135.63	0.00004
437522.02	3774135.63	0.00004	437534.36	3774135.63	0.00004
437546.70	3774135.63	0.00004	437559.04	3774135.63	0.00004

```
         437571.38    3774135.63        0.00004                    437583.72
3774135.63        0.00004
         437596.06    3774135.63        0.00004                    437608.40
3774135.63        0.00004
         437620.74    3774135.63        0.00004                    437633.08
3774135.63        0.00004
         437645.42    3774135.63        0.00004                    437657.76
3774135.63        0.00004
         437670.10    3774135.63        0.00004                    437682.44
3774135.63        0.00004
         437694.78    3774135.63        0.00004                    437707.12
3774135.63        0.00004
         437719.46    3774135.63        0.00004                    437731.80
3774135.63        0.00004
         437744.14    3774135.63        0.00004                    437756.48
3774135.63        0.00004
         437509.68    3774143.96        0.00004                    437522.02
3774143.96        0.00004
         437534.36    3774143.96        0.00004                    437546.70
3774143.96        0.00004
         437559.04    3774143.96        0.00004                    437571.38
3774143.96        0.00004
         437583.72    3774143.96        0.00004                    437596.06
3774143.96        0.00004
         437608.40    3774143.96        0.00004                    437620.74
3774143.96        0.00004
         437633.08    3774143.96        0.00004                    437645.42
3774143.96        0.00004
         437657.76    3774143.96        0.00004                    437670.10
3774143.96        0.00004
         437682.44    3774143.96        0.00004                    437694.78
3774143.96        0.00004
         437707.12    3774143.96        0.00004                    437719.46
3774143.96        0.00004
         437731.80    3774143.96        0.00004                    437744.14
3774143.96        0.00004
         437756.48    3774143.96        0.00004                    437509.68
3774152.29        0.00004
         437522.02    3774152.29        0.00004                    437534.36
3774152.29        0.00004
         437546.70    3774152.29        0.00004                    437559.04
3774152.29        0.00004
         437571.38    3774152.29        0.00004                    437583.72
3774152.29        0.00004
         437596.06    3774152.29        0.00004                    437608.40
3774152.29        0.00004
         437620.74    3774152.29        0.00004                    437633.08
3774152.29        0.00004
```

437645.42	3774152.29	0.00004	437657.76	3774152.29	0.00004
437670.10	3774152.29	0.00004	437682.44	3774152.29	0.00004
437694.78	3774152.29	0.00004	437707.12	3774152.29	0.00004
437719.46	3774152.29	0.00004	437731.80	3774152.29	0.00004

*** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

*** THE ANNUAL AVERAGE CONCENTRATION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): L0001543 , L0001544 , L0001545 , L0001546 , L0001547 ,
L0001548 , L0001549 , L0001550 , L0001551 , L0001552 , L0001553 , L0001554 , L0001555 ,
L0001556 , L0001557 , L0001558 , L0001559 , L0001560 , L0001561 , L0001562 , L0001563 ,
L0001564 , L0001565 , L0001566 , L0001567 , L0001568 , L0001569 , L0001570 , . . . ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF PM_10 IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD (M)	CONC
437744.14	3774152.29	0.00004	437756.48	3774152.29	0.00004
437509.68	3774160.62	0.00004	437522.02	3774160.62	0.00004
437534.36	3774160.62	0.00004	437546.70	3774160.62	0.00004
437559.04	3774160.62	0.00004	437571.38	3774160.62	0.00004
437583.72	3774160.62	0.00004	437596.06	3774160.62	0.00004
437608.40	3774160.62	0.00004	437620.74		

```
3774160.62        0.00004
         437633.08    3774160.62        0.00004                    437645.42
3774160.62        0.00004
         437657.76    3774160.62        0.00004                    437670.10
3774160.62        0.00004
         437682.44    3774160.62        0.00004                    437694.78
3774160.62        0.00004
         437707.12    3774160.62        0.00004                    437719.46
3774160.62        0.00004
         437731.80    3774160.62        0.00004                    437744.14
3774160.62        0.00004
         437756.48    3774160.62        0.00004                    437509.68
3774168.95        0.00004
         437522.02    3774168.95        0.00004                    437534.36
3774168.95        0.00004
         437546.70    3774168.95        0.00004                    437559.04
3774168.95        0.00004
         437571.38    3774168.95        0.00004                    437583.72
3774168.95        0.00004
         437596.06    3774168.95        0.00004                    437608.40
3774168.95        0.00004
         437620.74    3774168.95        0.00004                    437633.08
3774168.95        0.00004
         437645.42    3774168.95        0.00004                    437657.76
3774168.95        0.00004
         437670.10    3774168.95        0.00004                    437682.44
3774168.95        0.00004
         437694.78    3774168.95        0.00004                    437707.12
3774168.95        0.00004
         437719.46    3774168.95        0.00004                    437731.80
3774168.95        0.00004
         437744.14    3774168.95        0.00004                    437756.48
3774168.95        0.00004
         437509.68    3774177.28        0.00004                    437522.02
3774177.28        0.00004
         437534.36    3774177.28        0.00004                    437546.70
3774177.28        0.00004
         437559.04    3774177.28        0.00004                    437571.38
3774177.28        0.00004
         437583.72    3774177.28        0.00004                    437596.06
3774177.28        0.00004
         437608.40    3774177.28        0.00004                    437620.74
3774177.28        0.00004
         437633.08    3774177.28        0.00004                    437645.42
3774177.28        0.00004
         437657.76    3774177.28        0.00004                    437670.10
3774177.28        0.00004
         437682.44    3774177.28        0.00004                    437694.78
```

3774177.28 0.00004
437707.12 3774177.28 0.00004 437719.46
3774177.28 0.00004
437731.80 3774177.28 0.00004 437744.14
3774177.28 0.00004
437756.48 3774177.28 0.00004 437509.68
3774185.61 0.00004
437522.02 3774185.61 0.00004 437534.36
3774185.61 0.00004
437546.70 3774185.61 0.00004 437559.04
3774185.61 0.00004
437571.38 3774185.61 0.00004 437583.72
3774185.61 0.00004
437596.06 3774185.61 0.00004 437608.40
3774185.61 0.00004
437620.74 3774185.61 0.00004 437633.08
3774185.61 0.00004
437645.42 3774185.61 0.00004 437657.76
3774185.61 0.00004
437670.10 3774185.61 0.00004 437682.44
3774185.61 0.00004

*** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

*** THE ANNUAL AVERAGE CONCENTRATION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): L0001543 , L0001544 , L0001545 , L0001546 , L0001547 ,
L0001548 , L0001549 , L0001550 , L0001551 , L0001552 , L0001553 , L0001554 , L0001555 ,
L0001556 , L0001557 , L0001558 , L0001559 , L0001560 , L0001561 , L0001562 , L0001563 ,
L0001564 , L0001565 , L0001566 , L0001567 , L0001568 , L0001569 , L0001570 , . . . ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF PM_10 IN MICROGRAMS/M**3 **

X-COORD (M) Y-COORD (M) CONC X-COORD (M) Y-COORD (M) CONC

- - - -

```
         436401.45    3773464.08        0.00187                        436409.59
3773464.08        0.00141
         436417.73    3773464.08        0.00113                        436425.87
3773464.08        0.00095
         436434.01    3773464.08        0.00081                        436442.15
3773464.08        0.00072
         436450.29    3773464.08        0.00064                        436458.43
3773464.08        0.00058
         436466.57    3773464.08        0.00053                        436474.71
3773464.08        0.00049
         436482.85    3773464.08        0.00045                        436490.99
3773464.08        0.00042
         436499.13    3773464.08        0.00040                        436507.27
3773464.08        0.00037
         436515.41    3773464.08        0.00035                        436523.55
3773464.08        0.00034
         436531.69    3773464.08        0.00032                        436539.83
3773464.08        0.00030
         436547.97    3773464.08        0.00029                        436556.11
3773464.08        0.00028
         436401.45    3773482.93        0.00187                        436409.59
3773482.93        0.00141
         436417.73    3773482.93        0.00113                        436425.87
3773482.93        0.00095
         436434.01    3773482.93        0.00081                        436442.15
3773482.93        0.00072
         436450.29    3773482.93        0.00064                        436458.43
3773482.93        0.00058
         436466.57    3773482.93        0.00053                        436474.71
3773482.93        0.00049
         436482.85    3773482.93        0.00045                        436490.99
3773482.93        0.00042
         436499.13    3773482.93        0.00040                        436507.27
3773482.93        0.00037
```



```
 *** MODELOPTs:    RegDFAULT  CONC  ELEV  URBAN  ADJ_U*

                  *** THE ANNUAL AVERAGE CONCENTRATION    VALUES AVERAGED OVER   5
YEARS FOR SOURCE GROUP: ALL      ***
                                    INCLUDING SOURCE(S):     L0001543    , L0001544
 , L0001545    , L0001546    , L0001547    ,
                  L0001548    , L0001549    , L0001550    , L0001551    , L0001552
 , L0001553    , L0001554    , L0001555    ,
```

L0001556 , L0001557 , L0001558 , L0001559 , L0001560
, L0001561 , L0001562 , L0001563 ,
L0001564 , L0001565 , L0001566 , L0001567 , L0001568
, L0001569 , L0001570 , . . . ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF PM_10 IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD (M)	CONC
436515.41	3773482.93	0.00035	436523.55	3773482.93	0.00034
436531.69	3773482.93	0.00032	436539.83	3773482.93	0.00030
436547.97	3773482.93	0.00029	436556.11	3773482.93	0.00028
436401.45	3773501.78	0.00187	436409.59	3773501.78	0.00141
436417.73	3773501.78	0.00113	436425.87	3773501.78	0.00094
436434.01	3773501.78	0.00081	436442.15	3773501.78	0.00072
436450.29	3773501.78	0.00064	436458.43	3773501.78	0.00058
436466.57	3773501.78	0.00053	436474.71	3773501.78	0.00049
436482.85	3773501.78	0.00045	436490.99	3773501.78	0.00042
436499.13	3773501.78	0.00040	436507.27	3773501.78	0.00037
436515.41	3773501.78	0.00035	436523.55	3773501.78	0.00034
436531.69	3773501.78	0.00032	436539.83	3773501.78	0.00030
436547.97	3773501.78	0.00029	436556.11	3773501.78	0.00028
436401.45	3773520.63	0.00187	436409.59	3773520.63	0.00141
436417.73	3773520.63	0.00113	436425.87	3773520.63	0.00095
436434.01	3773520.63	0.00081	436442.15	3773520.63	0.00072
436450.29	3773520.63	0.00064	436458.43		

3773520.63 0.00058
436466.57 3773520.63 0.00053 436474.71
3773520.63 0.00049
436482.85 3773520.63 0.00045 436490.99
3773520.63 0.00042
436499.13 3773520.63 0.00040 436507.27
3773520.63 0.00037
436515.41 3773520.63 0.00035 436523.55
3773520.63 0.00034
436531.69 3773520.63 0.00032 436539.83
3773520.63 0.00030
436547.97 3773520.63 0.00029 436556.11
3773520.63 0.00028
436401.45 3773539.48 0.00187 436409.59
3773539.48 0.00141
436417.73 3773539.48 0.00113 436425.87
3773539.48 0.00095
436434.01 3773539.48 0.00081 436442.15
3773539.48 0.00072
436450.29 3773539.48 0.00064 436458.43
3773539.48 0.00058
436466.57 3773539.48 0.00053 436474.71
3773539.48 0.00049
436482.85 3773539.48 0.00045 436490.99
3773539.48 0.00042
436499.13 3773539.48 0.00040 436507.27
3773539.48 0.00037
436515.41 3773539.48 0.00035 436523.55
3773539.48 0.00034
436531.69 3773539.48 0.00032 436539.83
3773539.48 0.00031
436547.97 3773539.48 0.00029 436556.11
3773539.48 0.00028
436401.45 3773558.33 0.00188 436409.59
3773558.33 0.00141
436417.73 3773558.33 0.00113 436425.87
3773558.33 0.00094
436434.01 3773558.33 0.00081 436442.15
3773558.33 0.00072
436450.29 3773558.33 0.00064 436458.43
3773558.33 0.00058
436466.57 3773558.33 0.00053 436474.71
3773558.33 0.00049
436482.85 3773558.33 0.00045 436490.99
3773558.33 0.00042
436499.13 3773558.33 0.00040 436507.27
3773558.33 0.00038

*** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

*** THE ANNUAL AVERAGE CONCENTRATION VALUES AVERAGED OVER 5 YEARS FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): L0001543 , L0001544 , L0001545 , L0001546 , L0001547 ,
L0001548 , L0001549 , L0001550 , L0001551 , L0001552 , L0001553 , L0001554 , L0001555 ,
L0001556 , L0001557 , L0001558 , L0001559 , L0001560 , L0001561 , L0001562 , L0001563 ,
L0001564 , L0001565 , L0001566 , L0001567 , L0001568 , L0001569 , L0001570 , . . . ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF PM_10 IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD (M)	CONC
436515.41	3773558.33	0.00035	436523.55	3773558.33	0.00034
436531.69	3773558.33	0.00032	436539.83	3773558.33	0.00031
436547.97	3773558.33	0.00029	436556.11	3773558.33	0.00028
436401.45	3773577.18	0.00188	436409.59	3773577.18	0.00141
436417.73	3773577.18	0.00113	436425.87	3773577.18	0.00094
436434.01	3773577.18	0.00081	436442.15	3773577.18	0.00072
436450.29	3773577.18	0.00064	436458.43	3773577.18	0.00058
436466.57	3773577.18	0.00053	436474.71	3773577.18	0.00049
436482.85	3773577.18	0.00046	436490.99	3773577.18	0.00042
436499.13	3773577.18	0.00040	436507.27	3773577.18	0.00038

```
         436515.41    3773577.18        0.00035                    436523.55
3773577.18        0.00034
         436531.69    3773577.18        0.00032                    436539.83
3773577.18        0.00031
         436547.97    3773577.18        0.00029                    436556.11
3773577.18        0.00028
         436401.45    3773596.03        0.00188                    436409.59
3773596.03        0.00141
         436417.73    3773596.03        0.00113                    436425.87
3773596.03        0.00094
         436434.01    3773596.03        0.00081                    436442.15
3773596.03        0.00072
         436450.29    3773596.03        0.00064                    436458.43
3773596.03        0.00058
         436466.57    3773596.03        0.00053                    436474.71
3773596.03        0.00049
         436482.85    3773596.03        0.00046                    436490.99
3773596.03        0.00043
         436499.13    3773596.03        0.00040                    436507.27
3773596.03        0.00038
         436515.41    3773596.03        0.00036                    436523.55
3773596.03        0.00034
         436531.69    3773596.03        0.00032                    436539.83
3773596.03        0.00031
         436547.97    3773596.03        0.00029                    436556.11
3773596.03        0.00028
         436401.45    3773614.88        0.00188                    436409.59
3773614.88        0.00141
         436417.73    3773614.88        0.00113                    436425.87
3773614.88        0.00095
         436434.01    3773614.88        0.00082                    436442.15
3773614.88        0.00072
         436450.29    3773614.88        0.00064                    436458.43
3773614.88        0.00058
         436466.57    3773614.88        0.00053                    436474.71
3773614.88        0.00049
         436482.85    3773614.88        0.00046                    436490.99
3773614.88        0.00042
         436499.13    3773614.88        0.00040                    436507.27
3773614.88        0.00038
         436515.41    3773614.88        0.00035                    436523.55
3773614.88        0.00034
         436531.69    3773614.88        0.00032                    436539.83
3773614.88        0.00031
         436547.97    3773614.88        0.00029                    436556.11
3773614.88        0.00028
         436401.45    3773633.73        0.00189                    436409.59
3773633.73        0.00142
```

```
         436417.73    3773633.73        0.00113                       436425.87
3773633.73        0.00095
         436434.01    3773633.73        0.00082                       436442.15
3773633.73        0.00072
         436450.29    3773633.73        0.00064                       436458.43
3773633.73        0.00058
         436466.57    3773633.73        0.00053                       436474.71
3773633.73        0.00049
         436482.85    3773633.73        0.00045                       436490.99
3773633.73        0.00042
         436401.45    3773652.58        0.00189                       436409.59
3773652.58        0.00142
```



```
 *** MODELOPTs:    RegDFAULT  CONC  ELEV  URBAN  ADJ_U*

                   *** THE ANNUAL AVERAGE CONCENTRATION    VALUES AVERAGED OVER   5
YEARS FOR SOURCE GROUP: ALL      ***
                                    INCLUDING SOURCE(S):     L0001543    , L0001544
 , L0001545    , L0001546    , L0001547    ,
                   L0001548    , L0001549    , L0001550    , L0001551    , L0001552
 , L0001553    , L0001554    , L0001555    ,
                   L0001556    , L0001557    , L0001558    , L0001559    , L0001560
 , L0001561    , L0001562    , L0001563    ,
                   L0001564    , L0001565    , L0001566    , L0001567    , L0001568
 , L0001569    , L0001570    ,  . . .      ,

                                              *** DISCRETE CARTESIAN RECEPTOR POINTS
***

                                           ** CONC OF PM_10    IN MICROGRAMS/M**3
                    **

       X-COORD (M)   Y-COORD (M)        CONC                          X-COORD (M)
Y-COORD (M)        CONC
 - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
- - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
         436417.73    3773652.58        0.00114                       436425.87
3773652.58        0.00095
         436434.01    3773652.58        0.00082                       436442.15
3773652.58        0.00072
         436450.29    3773652.58        0.00064                       436458.43
3773652.58        0.00058
         436466.57    3773652.58        0.00053                       436474.71
```

3773652.58 0.00049
436482.85 3773652.58 0.00046 436490.99
3773652.58 0.00042
436401.45 3773671.43 0.00189 436409.59
3773671.43 0.00142
436417.73 3773671.43 0.00114 436425.87
3773671.43 0.00095
436434.01 3773671.43 0.00082 436442.15
3773671.43 0.00072
436450.29 3773671.43 0.00064 436458.43
3773671.43 0.00058
436466.57 3773671.43 0.00053 436474.71
3773671.43 0.00049
436482.85 3773671.43 0.00046 436490.99
3773671.43 0.00042
436401.45 3773690.28 0.00190 436409.59
3773690.28 0.00142
436417.73 3773690.28 0.00114 436425.87
3773690.28 0.00095
436434.01 3773690.28 0.00082 436442.15
3773690.28 0.00072
436450.29 3773690.28 0.00064 436458.43
3773690.28 0.00058
436466.57 3773690.28 0.00053 436474.71
3773690.28 0.00049
436482.85 3773690.28 0.00046 436490.99
3773690.28 0.00043
436401.45 3773709.13 0.00190 436409.59
3773709.13 0.00142
436417.73 3773709.13 0.00114 436425.87
3773709.13 0.00095
436434.01 3773709.13 0.00082 436442.15
3773709.13 0.00072
436450.29 3773709.13 0.00064 436458.43
3773709.13 0.00058
436466.57 3773709.13 0.00053 436474.71
3773709.13 0.00049
436482.85 3773709.13 0.00046 436490.99
3773709.13 0.00043
436401.45 3773727.98 0.00190 436409.59
3773727.98 0.00142
436417.73 3773727.98 0.00114 436425.87
3773727.98 0.00095
436434.01 3773727.98 0.00082 436442.15
3773727.98 0.00072
436450.29 3773727.98 0.00064 436458.43
3773727.98 0.00058
436466.57 3773727.98 0.00053 436474.71

```
3773727.98        0.00049
         436482.85    3773727.98        0.00046                      436490.99
3773727.98        0.00043
         436401.45    3773746.83        0.00191                      436409.59
3773746.83        0.00143
         436417.73    3773746.83        0.00114                      436425.87
3773746.83        0.00095
         436434.01    3773746.83        0.00082                      436442.15
3773746.83        0.00072
         436450.29    3773746.83        0.00065                      436458.43
3773746.83        0.00058
         436466.57    3773746.83        0.00053                      436474.71
3773746.83        0.00049
         436482.85    3773746.83        0.00046                      436490.99
3773746.83        0.00043
         436401.45    3773765.68        0.00191                      436409.59
3773765.68        0.00143
         436417.73    3773765.68        0.00114                      436425.87
3773765.68        0.00095
         436434.01    3773765.68        0.00082                      436442.15
3773765.68        0.00072
         436450.29    3773765.68        0.00065                      436458.43
3773765.68        0.00058
         436466.57    3773765.68        0.00053                      436474.71
3773765.68        0.00049
```



```
 *** MODELOPTs:    RegDFAULT  CONC  ELEV  URBAN  ADJ_U*

                   *** THE ANNUAL AVERAGE CONCENTRATION    VALUES AVERAGED OVER   5
YEARS FOR SOURCE GROUP: ALL      ***
                                    INCLUDING SOURCE(S):     L0001543    , L0001544
 , L0001545    , L0001546    , L0001547    ,
                   L0001548    , L0001549    , L0001550    , L0001551    , L0001552
 , L0001553    , L0001554    , L0001555    ,
                   L0001556    , L0001557    , L0001558    , L0001559    , L0001560
 , L0001561    , L0001562    , L0001563    ,
                   L0001564    , L0001565    , L0001566    , L0001567    , L0001568
 , L0001569    , L0001570    ,  . . .      ,

                                                *** DISCRETE CARTESIAN RECEPTOR POINTS
***

                                              ** CONC OF PM_10    IN MICROGRAMS/M**3
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**

X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD (M)	CONC
436482.85	3773765.68	0.00046	436490.99	3773765.68	0.00043
436401.45	3773784.53	0.00192	436409.59	3773784.53	0.00143
436417.73	3773784.53	0.00114	436425.87	3773784.53	0.00095
436434.01	3773784.53	0.00082	436442.15	3773784.53	0.00072
436450.29	3773784.53	0.00065	436458.43	3773784.53	0.00058
436466.57	3773784.53	0.00053	436474.71	3773784.53	0.00049
436482.85	3773784.53	0.00046	436490.99	3773784.53	0.00043
436401.45	3773803.38	0.00192	436409.59	3773803.38	0.00143
436417.73	3773803.38	0.00115	436425.87	3773803.38	0.00096
436434.01	3773803.38	0.00082	436442.15	3773803.38	0.00072
436450.29	3773803.38	0.00065	436458.43	3773803.38	0.00059
436466.57	3773803.38	0.00053	436474.71	3773803.38	0.00049
436482.85	3773803.38	0.00046	436490.99	3773803.38	0.00043

*** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): L0001543 , L0001544 , L0001545 , L0001546 , L0001547 ,
L0001548 , L0001549 , L0001550 , L0001551 , L0001552 , L0001553 , L0001554 , L0001555 ,
L0001556 , L0001557 , L0001558 , L0001559 , L0001560 , L0001561 , L0001562 , L0001563 ,

L0001564 , L0001565 , L0001566 , L0001567 , L0001568 , L0001569 , L0001570 , . . . ,

*** NETWORK ID: UCART1 ; NETWORK TYPE: GRIDCART ***

** CONC OF PM_10 IN MICROGRAMS/M**3 **

Y-COORD (METERS)	X-COORD (METERS)				
	437205.06	437217.73	437230.40	437243.07	437255.74
3774010.2	0.00034 (15073105)	0.00033 (15073105)	0.00033 (15073105)	0.00032 (15073105)	0.00032 (15073003)
3773980.9	0.00034 (15073105)	0.00033 (15073105)	0.00033 (15073105)	0.00032 (15073003)	0.00032 (15073003)
3773951.6	0.00034 (15073105)	0.00033 (15073105)	0.00033 (15073003)	0.00032 (15073003)	0.00032 (15073003)
3773922.3	0.00034 (15073105)	0.00033 (15073003)	0.00033 (15073003)	0.00032 (15073003)	0.00032 (15073003)
3773893.0	0.00034 (15073105)	0.00033 (15073003)	0.00033 (15073003)	0.00032 (15073003)	0.00032 (15073003)
3773863.7	0.00034 (15073003)	0.00033 (15073003)	0.00033 (15073003)	0.00032 (15073003)	0.00032 (15073003)
3773834.4	0.00034 (15073003)	0.00033 (15073003)	0.00033 (15073003)	0.00032 (15073003)	0.00032 (12090422)
3773805.1	0.00034 (15073003)	0.00033 (15073003)	0.00033 (15073003)	0.00032 (12090422)	0.00032 (12090422)
3773775.8	0.00034 (15073003)	0.00033 (15073003)	0.00033 (15073003)	0.00032 (12090422)	0.00032 (12090422)
3773746.5	0.00033 (15073003)	0.00033 (15073003)	0.00033 (12090422)	0.00032 (12090422)	0.00032 (12090422)
3773717.2	0.00033 (15073003)	0.00033 (12090422)	0.00032 (12090422)	0.00032 (12090422)	0.00032 (12090422)
3773687.9	0.00033 (12090422)	0.00033 (12090422)	0.00032 (12090422)	0.00032 (12090422)	0.00032 (12090422)
3773658.6	0.00033 (12090422)	0.00033 (12090422)	0.00032 (12090422)	0.00032 (12090422)	0.00032 (12090422)
3773629.3	0.00033 (12090422)	0.00033 (12090422)	0.00032 (12090422)	0.00032 (12090422)	0.00032 (12090422)
3773600.0	0.00033 (12090422)	0.00033 (12090422)	0.00032 (12090422)	0.00031 (12090422)	0.00032 (12090422)
3773570.7	0.00033 (12090422)	0.00033 (12090422)	0.00032 (12090422)	0.00031 (12090422)	0.00032 (12090422)
3773541.4	0.00033 (12090422)	0.00033 (12090422)	0.00032 (12090422)	0.00032 (12090422)	0.00032 (12090422)

(12090422)   0.00032 (12090422)   0.00031 (12090422)
 3773512.1 | 0.00033 (12090422)   0.00032 (12090422)   0.00032
(12090422)   0.00031 (12090422)   0.00031 (12080622)
 3773482.8 | 0.00033 (12090422)   0.00032 (12090422)   0.00032
(12090422)   0.00031 (12080622)   0.00031 (12080622)
 3773453.5 | 0.00032 (12090422)   0.00032 (12090422)   0.00032
(12080622)   0.00031 (12080622)   0.00031 (12080622)
 3773424.2 | 0.00032 (12090422)   0.00032 (12080622)   0.00031
(12080622)   0.00031 (12080622)   0.00031 (12080622)

 *** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

                              *** THE   1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL   ***
                                 INCLUDING SOURCE(S):   L0001543   , L0001544
 , L0001545   , L0001546   , L0001547   ,
                 L0001548   , L0001549   , L0001550   , L0001551   , L0001552
 , L0001553   , L0001554   , L0001555   ,
                 L0001556   , L0001557   , L0001558   , L0001559   , L0001560
 , L0001561   , L0001562   , L0001563   ,
                 L0001564   , L0001565   , L0001566   , L0001567   , L0001568
 , L0001569   , L0001570   , . . .   ,

                                  *** NETWORK ID: UCART1   ; NETWORK TYPE: GRIDCART ***

                                      ** CONC OF PM_10   IN MICROGRAMS/M**3
                    **

  Y-COORD | X-COORD (METERS)
  (METERS) | 437268.41   437281.08   437293.75
       437306.42   437319.09
 - - -

```
 3773893.0 |      0.00031 (15073003)      0.00031 (12090422)      0.00031
(12090422)      0.00030 (12090422)      0.00030 (12090422)
 3773863.7 |      0.00031 (12090422)      0.00031 (12090422)      0.00031
(12090422)      0.00030 (12090422)      0.00030 (12090422)
 3773834.4 |      0.00031 (12090422)      0.00031 (12090422)      0.00031
(12090422)      0.00030 (12090422)      0.00030 (12090422)
 3773805.1 |      0.00031 (12090422)      0.00031 (12090422)      0.00031
(12090422)      0.00030 (12090422)      0.00030 (12090422)
 3773775.8 |      0.00031 (12090422)      0.00031 (12090422)      0.00031
(12090422)      0.00030 (12090422)      0.00030 (12090422)
 3773746.5 |      0.00031 (12090422)      0.00031 (12090422)      0.00031
(12090422)      0.00030 (12090422)      0.00030 (12090422)
 3773717.2 |      0.00031 (12090422)      0.00031 (12090422)      0.00030
(12090422)      0.00030 (12090422)      0.00030 (12090422)
 3773687.9 |      0.00031 (12090422)      0.00031 (12090422)      0.00030
(12090422)      0.00030 (12090422)      0.00029 (12090422)
 3773658.6 |      0.00031 (12090422)      0.00031 (12090422)      0.00030
(12090422)      0.00030 (12090422)      0.00029 (12090422)
 3773629.3 |      0.00031 (12090422)      0.00031 (12090422)      0.00030
(12090422)      0.00030 (12090422)      0.00029 (12080622)
 3773600.0 |      0.00031 (12090422)      0.00031 (12090422)      0.00030
(12090422)      0.00030 (12080622)      0.00029 (12080622)
 3773570.7 |      0.00031 (12090422)      0.00030 (12090422)      0.00030
(12080622)      0.00030 (12080622)      0.00029 (12080622)
 3773541.4 |      0.00031 (12080622)      0.00030 (12080622)      0.00030
(12080622)      0.00030 (12080622)      0.00029 (12080622)
 3773512.1 |      0.00031 (12080622)      0.00030 (12080622)      0.00030
(12080622)      0.00030 (12080622)      0.00029 (12080622)
 3773482.8 |      0.00031 (12080622)      0.00030 (12080622)      0.00030
(12080622)      0.00030 (12080622)      0.00029 (12080622)
 3773453.5 |      0.00030 (12080622)      0.00030 (12080622)      0.00030
(12080622)      0.00029 (12080622)      0.00029 (12080622)
 3773424.2 |      0.00030 (12080622)      0.00030 (12080622)      0.00030
(12080622)      0.00029 (14072524)      0.00029 (14072524)
 *** AERMOD - VERSION  19191 ***   *** C:\Lakes\AERMOD View\Bridge Upland\Bridge
Upland.isc                 ***        01/15/20
 *** AERMET - VERSION  16216 ***   ***
                       ***        13:48:55

                                  PAGE  77
 *** MODELOPTs:    RegDFAULT  CONC  ELEV  URBAN  ADJ_U*

                               *** THE   1ST HIGHEST  1-HR AVERAGE CONCENTRATION
VALUES FOR SOURCE GROUP:  ALL      ***
                                  INCLUDING SOURCE(S):     L0001543    , L0001544
 , L0001545    , L0001546    , L0001547    ,
                L0001548    , L0001549    , L0001550    , L0001551    , L0001552
 , L0001553    , L0001554    , L0001555    ,
```

L0001556 , L0001557 , L0001558 , L0001559 , L0001560
, L0001561 , L0001562 , L0001563 ,
L0001564 , L0001565 , L0001566 , L0001567 , L0001568
, L0001569 , L0001570 , . . . ,

*** NETWORK ID: UCART1 ; NETWORK TYPE: GRIDCART ***

** CONC OF PM_10 IN MICROGRAMS/M**3 **

Y-COORD (METERS)	X-COORD (METERS)				
	437331.76	437344.43	437357.10	437369.77	437382.44
3774010.2	0.00029 (12090422)	0.00029 (12090422)	0.00028 (12090422)	0.00028 (12090422)	0.00028 (12090422)
3773980.9	0.00029 (12090422)	0.00029 (12090422)	0.00029 (12090422)	0.00028 (12090422)	0.00028 (12090422)
3773951.6	0.00030 (12090422)	0.00029 (12090422)	0.00029 (12090422)	0.00029 (12090422)	0.00028 (12090422)
3773922.3	0.00030 (12090422)	0.00029 (12090422)	0.00029 (12090422)	0.00029 (12090422)	0.00028 (12090422)
3773893.0	0.00030 (12090422)	0.00029 (12090422)	0.00029 (12090422)	0.00029 (12090422)	0.00028 (12090422)
3773863.7	0.00030 (12090422)	0.00029 (12090422)	0.00029 (12090422)	0.00029 (12090422)	0.00028 (12090422)
3773834.4	0.00030 (12090422)	0.00029 (12090422)	0.00029 (12090422)	0.00029 (12090422)	0.00028 (12090422)
3773805.1	0.00030 (12090422)	0.00029 (12090422)	0.00029 (12090422)	0.00028 (12090422)	0.00028 (12090422)
3773775.8	0.00030 (12090422)	0.00029 (12090422)	0.00029 (12090422)	0.00028 (12090422)	0.00028 (12090422)
3773746.5	0.00029 (12090422)	0.00029 (12090422)	0.00029 (12090422)	0.00028 (12080622)	0.00028 (12080622)
3773717.2	0.00029 (12090422)	0.00029 (12090422)	0.00029 (12080622)	0.00028 (12080622)	0.00028 (12080622)
3773687.9	0.00029 (12080622)	0.00029 (12080622)	0.00029 (12080622)	0.00028 (12080622)	0.00028 (12080622)
3773658.6	0.00029 (12080622)	0.00029 (12080622)	0.00029 (12080622)	0.00028 (12080622)	0.00028 (12080622)
3773629.3	0.00029 (12080622)	0.00029 (12080622)	0.00029 (12080622)	0.00028 (12080622)	0.00028 (12080622)
3773600.0	0.00029 (12080622)	0.00029 (12080622)	0.00029 (12080622)	0.00028 (12080622)	0.00028 (12080622)
3773570.7	0.00029 (12080622)	0.00029 (12080622)	0.00028		

(12080622)   0.00028 (12080622)   0.00028 (12080622)
 3773541.4 | 0.00029 (12080622)   0.00029 (12080622)   0.00028
(12080622)   0.00028 (12080622)   0.00028 (14072524)
 3773512.1 | 0.00029 (12080622)   0.00029 (12080622)   0.00028
(12080622)   0.00028 (14072524)   0.00028 (14072524)
 3773482.8 | 0.00029 (12080622)   0.00028 (14072524)   0.00028
(14072524)   0.00028 (14072524)   0.00027 (14072524)
 3773453.5 | 0.00029 (14072524)   0.00028 (14072524)   0.00028
(14072524)   0.00028 (14072524)   0.00027 (15062822)
 3773424.2 | 0.00029 (14072524)   0.00028 (14072524)   0.00028
(15062822)   0.00028 (15062822)   0.00027 (15062822)

 *** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

                              *** THE   1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL   ***
                                 INCLUDING SOURCE(S):   L0001543   , L0001544
 , L0001545   , L0001546   , L0001547   ,
                  L0001548   , L0001549   , L0001550   , L0001551   , L0001552
 , L0001553   , L0001554   , L0001555   ,
                  L0001556   , L0001557   , L0001558   , L0001559   , L0001560
 , L0001561   , L0001562   , L0001563   ,
                  L0001564   , L0001565   , L0001566   , L0001567   , L0001568
 , L0001569   , L0001570   , . . .   ,

                                  *** NETWORK ID: UCART1   ; NETWORK TYPE: GRIDCART ***

                                     ** CONC OF PM_10   IN MICROGRAMS/M**3
                    **

  Y-COORD | X-COORD (METERS)
  (METERS) | 437395.11   437407.78   437420.45
       437433.12   437445.79
 - - -

```
 3773922.3 |      0.00028 (12090422)      0.00028 (12090422)      0.00027
(12090422)      0.00027 (12090422)      0.00027 (12090422)
 3773893.0 |      0.00028 (12090422)      0.00028 (12090422)      0.00027
(12090422)      0.00027 (12090422)      0.00027 (12080622)
 3773863.7 |      0.00028 (12090422)      0.00028 (12090422)      0.00027
(12090422)      0.00027 (12080622)      0.00027 (12080622)
 3773834.4 |      0.00028 (12090422)      0.00027 (12090422)      0.00027
(12080622)      0.00027 (12080622)      0.00027 (12080622)
 3773805.1 |      0.00028 (12090422)      0.00027 (12080622)      0.00027
(12080622)      0.00027 (12080622)      0.00027 (12080622)
 3773775.8 |      0.00028 (12080622)      0.00027 (12080622)      0.00027
(12080622)      0.00027 (12080622)      0.00027 (12080622)
 3773746.5 |      0.00028 (12080622)      0.00027 (12080622)      0.00027
(12080622)      0.00027 (12080622)      0.00027 (12080622)
 3773717.2 |      0.00028 (12080622)      0.00028 (12080622)      0.00027
(12080622)      0.00027 (12080622)      0.00027 (12080622)
 3773687.9 |      0.00028 (12080622)      0.00027 (12080622)      0.00027
(12080622)      0.00027 (12080622)      0.00027 (12080622)
 3773658.6 |      0.00028 (12080622)      0.00027 (12080622)      0.00027
(12080622)      0.00027 (12080622)      0.00027 (14072524)
 3773629.3 |      0.00028 (12080622)      0.00027 (12080622)      0.00027
(12080622)      0.00027 (14072524)      0.00026 (14072524)
 3773600.0 |      0.00028 (12080622)      0.00027 (12080622)      0.00027
(14072524)      0.00027 (14072524)      0.00026 (14072524)
 3773570.7 |      0.00028 (14072524)      0.00027 (14072524)      0.00027
(14072524)      0.00027 (14072524)      0.00026 (15062822)
 3773541.4 |      0.00027 (14072524)      0.00027 (14072524)      0.00027
(14072524)      0.00026 (15062822)      0.00026 (15062822)
 3773512.1 |      0.00027 (14072524)      0.00027 (14072524)      0.00027
(15062822)      0.00026 (15062822)      0.00026 (15062822)
 3773482.8 |      0.00027 (15062822)      0.00027 (15062822)      0.00027
(15062822)      0.00026 (15062822)      0.00026 (15062822)
 3773453.5 |      0.00027 (15062822)      0.00027 (15062822)      0.00027
(15062822)      0.00026 (15062822)      0.00026 (15062822)
 3773424.2 |      0.00027 (15062822)      0.00027 (15062822)      0.00026
(15062822)      0.00026 (15062822)      0.00026 (15062822)
 *** AERMOD - VERSION  19191 ***   *** C:\Lakes\AERMOD View\Bridge Upland\Bridge
Upland.isc                 ***        01/15/20
 *** AERMET - VERSION  16216 ***   ***
                          ***       13:48:55

                                    PAGE  79
 *** MODELOPTs:    RegDFAULT  CONC  ELEV  URBAN  ADJ_U*

                               *** THE   1ST HIGHEST  1-HR AVERAGE CONCENTRATION
VALUES FOR SOURCE GROUP:  ALL      ***
                                   INCLUDING SOURCE(S):     L0001543    , L0001544
 , L0001545    , L0001546    , L0001547    ,
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```
                L0001548    , L0001549    , L0001550    , L0001551    , L0001552
 , L0001553    , L0001554    , L0001555    ,
                L0001556    , L0001557    , L0001558    , L0001559    , L0001560
 , L0001561    , L0001562    , L0001563    ,
                L0001564    , L0001565    , L0001566    , L0001567    , L0001568
 , L0001569    , L0001570    ,  . . .      ,

                                  *** NETWORK ID: UCART1   ;  NETWORK TYPE:
GRIDCART ***

                                       ** CONC OF PM_10    IN MICROGRAMS/M**3
                   **

  Y-COORD  |                                                  X-COORD (METERS)
  (METERS) |       437458.46
 - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
- - - - - - - - - - - - - - - - - - - - - - - - - - - - - -

 3774010.2 |      0.00026 (12090422)
 3773980.9 |      0.00026 (12090422)
 3773951.6 |      0.00026 (12090422)
 3773922.3 |      0.00026 (12080622)
 3773893.0 |      0.00026 (12080622)
 3773863.7 |      0.00026 (12080622)
 3773834.4 |      0.00026 (12080622)
 3773805.1 |      0.00026 (12080622)
 3773775.8 |      0.00026 (12080622)
 3773746.5 |      0.00026 (12080622)
 3773717.2 |      0.00026 (12080622)
 3773687.9 |      0.00026 (12080622)
 3773658.6 |      0.00026 (14072524)
 3773629.3 |      0.00026 (14072524)
 3773600.0 |      0.00026 (14072524)
 3773570.7 |      0.00026 (15062822)
 3773541.4 |      0.00026 (15062822)
 3773512.1 |      0.00026 (15062822)
 3773482.8 |      0.00026 (15062822)
 3773453.5 |      0.00026 (15062822)
 3773424.2 |      0.00026 (15062822)
```

VALUES FOR SOURCE GROUP: ALL *** INCLUDING SOURCE(S): L0001543 , L0001544 , L0001545 , L0001546 , L0001547 , L0001548 , L0001549 , L0001550 , L0001551 , L0001552 , L0001553 , L0001554 , L0001555 , L0001556 , L0001557 , L0001558 , L0001559 , L0001560 , L0001561 , L0001562 , L0001563 , L0001564 , L0001565 , L0001566 , L0001567 , L0001568 , L0001569 , L0001570 , . . . ,

*** NETWORK ID: UCART2 ; NETWORK TYPE: GRIDCART ***

** CONC OF PM_10 IN MICROGRAMS/M**3 **

Y-COORD (METERS)	X-COORD (METERS) 437338.99	437349.41	437359.83	437370.25	437380.67
3774609.5	0.00027 (12092103)	0.00027 (12092103)	0.00026 (15073105)	0.00026 (15073105)	0.00026 (15073105)
3774590.8	0.00027 (12092103)	0.00027 (12092103)	0.00027 (15073105)	0.00026 (15073105)	0.00026 (15073105)
3774572.0	0.00027 (12092103)	0.00027 (15073105)	0.00027 (15073105)	0.00026 (15073105)	0.00026 (15073105)
3774553.2	0.00027 (12092103)	0.00027 (15073105)	0.00027 (15073105)	0.00027 (15073105)	0.00026 (15073105)
3774534.4	0.00027 (15073105)	0.00027 (15073105)	0.00027 (15073105)	0.00027 (15073105)	0.00026 (15073105)
3774515.7	0.00028 (15073105)	0.00027 (15073105)	0.00027 (15073105)	0.00027 (15073105)	0.00027 (15073105)
3774496.9	0.00028 (15073105)	0.00027 (15073105)	0.00027 (15073105)	0.00027 (15073105)	0.00027 (15073105)
3774478.1	0.00028 (15073105)	0.00028 (15073105)	0.00027 (15073105)	0.00027 (15073105)	0.00027 (15073105)
3774459.4	0.00028 (15073105)	0.00028 (15073105)	0.00027 (15073105)	0.00027 (15073105)	0.00027 (15073105)
3774440.6	0.00028 (15073105)	0.00028 (15073105)	0.00027 (15073105)	0.00027 (15073105)	0.00027 (15073105)
3774421.8	0.00028 (15073105)	0.00028 (15073105)	0.00027 (15073003)	0.00027 (15073105)	0.00027 (15073105)
3774403.1	0.00028 (15073105)	0.00028 (15073105)	0.00028 (15073105)	0.00027 (15073003)	0.00027 (15073105)
3774384.3	0.00028 (15073105)	0.00028 (15073105)	0.00028 (15073105)	0.00027 (15073003)	0.00027 (15073003)

```
 3774365.5 |      0.00028 (15073105)      0.00028 (15073105)      0.00028
(15073105)      0.00027 (15073003)      0.00027 (15073003)
 3774346.7 |      0.00028 (15073105)      0.00028 (15073105)      0.00028
(15073003)      0.00027 (15073003)      0.00027 (15073003)
 3774328.0 |      0.00028 (15073105)      0.00028 (15073003)      0.00028
(15073003)      0.00028 (15073003)      0.00027 (15073003)
 3774309.2 |      0.00029 (15073105)      0.00028 (15073003)      0.00028
(15073003)      0.00028 (15073003)      0.00027 (15073003)
 3774290.4 |      0.00029 (15073105)      0.00028 (15073003)      0.00028
(15073003)      0.00028 (15073003)      0.00028 (15073003)
 3774271.7 |      0.00029 (15073003)      0.00029 (15073003)      0.00028
(15073003)      0.00028 (15073003)      0.00028 (15073003)
 3774252.9 |      0.00029 (15073003)      0.00029 (15073003)      0.00028
(15073003)      0.00028 (15073003)      0.00028 (15073003)
 3774234.1 |      0.00029 (15073003)      0.00029 (15073003)      0.00028
(15073003)      0.00028 (15073003)      0.00028 (15073003)
```



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 *** MODELOPTs:    RegDFAULT  CONC  ELEV  URBAN  ADJ_U*

                               *** THE   1ST HIGHEST  1-HR AVERAGE CONCENTRATION
VALUES FOR SOURCE GROUP:  ALL      ***
                                  INCLUDING SOURCE(S):     L0001543    , L0001544
 , L0001545    , L0001546    , L0001547    ,
                 L0001548    , L0001549    , L0001550    , L0001551    , L0001552
 , L0001553    , L0001554    , L0001555    ,
                 L0001556    , L0001557    , L0001558    , L0001559    , L0001560
 , L0001561    , L0001562    , L0001563    ,
                 L0001564    , L0001565    , L0001566    , L0001567    , L0001568
 , L0001569    , L0001570    ,  . . .      ,

                                  *** NETWORK ID: UCART2   ;  NETWORK TYPE:
GRIDCART ***

                                     ** CONC OF PM_10    IN MICROGRAMS/M**3
                   **

  Y-COORD  |                                                 X-COORD (METERS)
  (METERS) |       437391.09              437401.51              437411.93
       437422.35              437432.77
 - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
- - - - - - - - - - - - - - - - - - - - - - - - - -

 3774609.5 |      0.00026 (15073105)      0.00025 (15073105)      0.00025
```

```
(15073105)      0.00025 (15073003)      0.00025 (15073003)
 3774590.8 |      0.00026 (15073105)      0.00026 (15073105)      0.00025
(15073105)      0.00025 (15073003)      0.00025 (15073003)
 3774572.0 |      0.00026 (15073105)      0.00026 (15073105)      0.00025
(15073105)      0.00025 (15073003)      0.00025 (15073003)
 3774553.2 |      0.00026 (15073105)      0.00026 (15073105)      0.00026
(15073003)      0.00025 (15073003)      0.00025 (15073003)
 3774534.4 |      0.00026 (15073105)      0.00026 (15073105)      0.00026
(15073003)      0.00025 (15073003)      0.00025 (15073003)
 3774515.7 |      0.00026 (15073105)      0.00026 (15073003)      0.00026
(15073003)      0.00026 (15073003)      0.00025 (15073003)
 3774496.9 |      0.00026 (15073105)      0.00026 (15073003)      0.00026
(15073003)      0.00026 (15073003)      0.00025 (15073003)
 3774478.1 |      0.00026 (15073105)      0.00026 (15073003)      0.00026
(15073003)      0.00026 (15073003)      0.00026 (15073003)
 3774459.4 |      0.00027 (15073003)      0.00026 (15073003)      0.00026
(15073003)      0.00026 (15073003)      0.00026 (15073003)
 3774440.6 |      0.00027 (15073003)      0.00026 (15073003)      0.00026
(15073003)      0.00026 (15073003)      0.00026 (15073003)
 3774421.8 |      0.00027 (15073003)      0.00026 (15073003)      0.00026
(15073003)      0.00026 (15073003)      0.00026 (15073003)
 3774403.1 |      0.00027 (15073003)      0.00027 (15073003)      0.00026
(15073003)      0.00026 (15073003)      0.00026 (15073003)
 3774384.3 |      0.00027 (15073003)      0.00027 (15073003)      0.00026
(15073003)      0.00026 (15073003)      0.00026 (12090422)
 3774365.5 |      0.00027 (15073003)      0.00027 (15073003)      0.00026
(15073003)      0.00026 (15073003)      0.00026 (12090422)
 3774346.7 |      0.00027 (15073003)      0.00027 (15073003)      0.00027
(15073003)      0.00026 (12090422)      0.00026 (12090422)
 3774328.0 |      0.00027 (15073003)      0.00027 (15073003)      0.00027
(15073003)      0.00026 (12090422)      0.00026 (12090422)
 3774309.2 |      0.00027 (15073003)      0.00027 (15073003)      0.00027
(12090422)      0.00026 (12090422)      0.00026 (12090422)
 3774290.4 |      0.00027 (15073003)      0.00027 (15073003)      0.00027
(12090422)      0.00026 (12090422)      0.00026 (12090422)
 3774271.7 |      0.00027 (15073003)      0.00027 (12090422)      0.00027
(12090422)      0.00027 (12090422)      0.00026 (12090422)
 3774252.9 |      0.00027 (15073003)      0.00027 (12090422)      0.00027
(12090422)      0.00027 (12090422)      0.00026 (12090422)
 3774234.1 |      0.00027 (15073003)      0.00027 (12090422)      0.00027
(12090422)      0.00027 (12090422)      0.00026 (12090422)
 *** AERMOD - VERSION  19191 ***   *** C:\Lakes\AERMOD View\Bridge Upland\Bridge
Upland.isc                  ***        01/15/20
 *** AERMET - VERSION  16216 ***   ***
                          ***       13:48:55

                                    PAGE  82
 *** MODELOPTs:    RegDFAULT  CONC  ELEV  URBAN  ADJ_U*
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*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): L0001543 , L0001544 , L0001545 , L0001546 , L0001547 , L0001548 , L0001549 , L0001550 , L0001551 , L0001552 , L0001553 , L0001554 , L0001555 , L0001556 , L0001557 , L0001558 , L0001559 , L0001560 , L0001561 , L0001562 , L0001563 , L0001564 , L0001565 , L0001566 , L0001567 , L0001568 , L0001569 , L0001570 , . . . ,

*** NETWORK ID: UCART2 ; NETWORK TYPE: GRIDCART ***

** CONC OF PM_10 IN MICROGRAMS/M**3 **

Y-COORD (METERS)	X-COORD (METERS) 437443.19	437453.61	437464.03	437474.45	437484.87
3774609.5	0.00024 (15073003)	0.00024 (12090422)	0.00024 (12090422)	0.00024 (12090422)	0.00024 (12090422)
3774590.8	0.00025 (15073003)	0.00024 (12090422)	0.00024 (12090422)	0.00024 (12090422)	0.00024 (12090422)
3774572.0	0.00025 (15073003)	0.00024 (12090422)	0.00024 (12090422)	0.00024 (12090422)	0.00024 (12090422)
3774553.2	0.00025 (15073003)	0.00025 (15073003)	0.00024 (12090422)	0.00024 (12090422)	0.00024 (12090422)
3774534.4	0.00025 (15073003)	0.00025 (12090422)	0.00025 (12090422)	0.00024 (12090422)	0.00024 (12090422)
3774515.7	0.00025 (15073003)	0.00025 (12090422)	0.00025 (12090422)	0.00024 (12090422)	0.00024 (12090422)
3774496.9	0.00025 (15073003)	0.00025 (12090422)	0.00025 (12090422)	0.00025 (12090422)	0.00024 (12090422)
3774478.1	0.00025 (15073003)	0.00025 (12090422)	0.00025 (12090422)	0.00025 (12090422)	0.00024 (12090422)
3774459.4	0.00025 (12090422)	0.00025 (12090422)	0.00025 (12090422)	0.00025 (12090422)	0.00025 (12090422)
3774440.6	0.00025 (12090422)	0.00025 (12090422)	0.00025 (12090422)	0.00025 (12090422)	0.00025 (12090422)
3774421.8	0.00026 (12090422)	0.00025 (12090422)	0.00025 (12090422)	0.00025 (12090422)	0.00025 (12090422)
3774403.1	0.00026 (12090422)	0.00025 (12090422)	0.00025 (12090422)	0.00025 (12090422)	0.00025 (12090422)

```
 3774384.3 |      0.00026 (12090422)      0.00026 (12090422)      0.00025
(12090422)      0.00025 (12090422)      0.00025 (12090422)
 3774365.5 |      0.00026 (12090422)      0.00026 (12090422)      0.00025
(12090422)      0.00025 (12090422)      0.00025 (12090422)
 3774346.7 |      0.00026 (12090422)      0.00026 (12090422)      0.00025
(12090422)      0.00025 (12090422)      0.00025 (12090422)
 3774328.0 |      0.00026 (12090422)      0.00026 (12090422)      0.00025
(12090422)      0.00025 (12090422)      0.00025 (12090422)
 3774309.2 |      0.00026 (12090422)      0.00026 (12090422)      0.00026
(12090422)      0.00025 (12090422)      0.00025 (12090422)
 3774290.4 |      0.00026 (12090422)      0.00026 (12090422)      0.00026
(12090422)      0.00025 (12090422)      0.00025 (12090422)
 3774271.7 |      0.00026 (12090422)      0.00026 (12090422)      0.00026
(12090422)      0.00025 (12090422)      0.00025 (12090422)
 3774252.9 |      0.00026 (12090422)      0.00026 (12090422)      0.00026
(12090422)      0.00025 (12090422)      0.00025 (12090422)
 3774234.1 |      0.00026 (12090422)      0.00026 (12090422)      0.00026
(12090422)      0.00026 (12090422)      0.00025 (12090422)
```



```
 *** MODELOPTs:    RegDFAULT  CONC  ELEV  URBAN  ADJ_U*

                               *** THE   1ST HIGHEST  1-HR AVERAGE CONCENTRATION
VALUES FOR SOURCE GROUP:  ALL      ***
                                  INCLUDING SOURCE(S):     L0001543    , L0001544
 , L0001545    , L0001546    , L0001547    ,
                 L0001548    , L0001549    , L0001550    , L0001551    , L0001552
 , L0001553    , L0001554    , L0001555    ,
                 L0001556    , L0001557    , L0001558    , L0001559    , L0001560
 , L0001561    , L0001562    , L0001563    ,
                 L0001564    , L0001565    , L0001566    , L0001567    , L0001568
 , L0001569    , L0001570    ,  . . .      ,

                                  *** NETWORK ID: UCART2   ;  NETWORK TYPE:
GRIDCART ***

                                       ** CONC OF PM_10    IN MICROGRAMS/M**3
                    **

  Y-COORD  |                                                  X-COORD (METERS)
  (METERS) |       437495.29              437505.71              437516.13
       437526.55              437536.97
 - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
- - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
```

```
 3774609.5 |      0.00023 (12090422)      0.00023 (12090422)      0.00023
(12090422)      0.00023 (12090422)      0.00023 (12090422)
 3774590.8 |      0.00024 (12090422)      0.00023 (12090422)      0.00023
(12090422)      0.00023 (12090422)      0.00023 (12090422)
 3774572.0 |      0.00024 (12090422)      0.00023 (12090422)      0.00023
(12090422)      0.00023 (12090422)      0.00023 (12090422)
 3774553.2 |      0.00024 (12090422)      0.00024 (12090422)      0.00023
(12090422)      0.00023 (12090422)      0.00023 (12090422)
 3774534.4 |      0.00024 (12090422)      0.00024 (12090422)      0.00024
(12090422)      0.00023 (12090422)      0.00023 (12090422)
 3774515.7 |      0.00024 (12090422)      0.00024 (12090422)      0.00024
(12090422)      0.00023 (12090422)      0.00023 (12090422)
 3774496.9 |      0.00024 (12090422)      0.00024 (12090422)      0.00024
(12090422)      0.00024 (12090422)      0.00023 (12090422)
 3774478.1 |      0.00024 (12090422)      0.00024 (12090422)      0.00024
(12090422)      0.00024 (12090422)      0.00023 (12090422)
 3774459.4 |      0.00024 (12090422)      0.00024 (12090422)      0.00024
(12090422)      0.00024 (12090422)      0.00023 (12090422)
 3774440.6 |      0.00024 (12090422)      0.00024 (12090422)      0.00024
(12090422)      0.00024 (12090422)      0.00024 (12090422)
 3774421.8 |      0.00024 (12090422)      0.00024 (12090422)      0.00024
(12090422)      0.00024 (12090422)      0.00024 (12090422)
 3774403.1 |      0.00025 (12090422)      0.00024 (12090422)      0.00024
(12090422)      0.00024 (12090422)      0.00024 (12090422)
 3774384.3 |      0.00025 (12090422)      0.00024 (12090422)      0.00024
(12090422)      0.00024 (12090422)      0.00024 (12090422)
 3774365.5 |      0.00025 (12090422)      0.00025 (12090422)      0.00024
(12090422)      0.00024 (12090422)      0.00024 (12090422)
 3774346.7 |      0.00025 (12090422)      0.00025 (12090422)      0.00024
(12090422)      0.00024 (12090422)      0.00024 (12090422)
 3774328.0 |      0.00025 (12090422)      0.00025 (12090422)      0.00024
(12090422)      0.00024 (12090422)      0.00024 (12090422)
 3774309.2 |      0.00025 (12090422)      0.00025 (12090422)      0.00024
(12090422)      0.00024 (12090422)      0.00024 (12090422)
 3774290.4 |      0.00025 (12090422)      0.00025 (12090422)      0.00024
(12090422)      0.00024 (12090422)      0.00024 (12090422)
 3774271.7 |      0.00025 (12090422)      0.00025 (12090422)      0.00025
(12090422)      0.00024 (12090422)      0.00024 (12090422)
 3774252.9 |      0.00025 (12090422)      0.00025 (12090422)      0.00025
(12090422)      0.00024 (12090422)      0.00024 (12090422)
 3774234.1 |      0.00025 (12090422)      0.00025 (12090422)      0.00025
(12090422)      0.00024 (12090422)      0.00024 (12090422)
 *** AERMOD - VERSION  19191 ***   *** C:\Lakes\AERMOD View\Bridge Upland\Bridge
Upland.isc                 ***        01/15/20
 *** AERMET - VERSION  16216 ***   ***
                       ***        13:48:55
```

*** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): L0001543 , L0001544 , L0001545 , L0001546 , L0001547 ,
L0001548 , L0001549 , L0001550 , L0001551 , L0001552 , L0001553 , L0001554 , L0001555 ,
L0001556 , L0001557 , L0001558 , L0001559 , L0001560 , L0001561 , L0001562 , L0001563 ,
L0001564 , L0001565 , L0001566 , L0001567 , L0001568 , L0001569 , L0001570 , . . . ,

*** NETWORK ID: UCART2 ; NETWORK TYPE: GRIDCART ***

** CONC OF PM_10 IN MICROGRAMS/M**3 **

Y-COORD (METERS)	X-COORD (METERS) 437547.39
3774609.5	0.00022 (12090422)
3774590.8	0.00023 (12090422)
3774572.0	0.00023 (12090422)
3774553.2	0.00023 (12090422)
3774534.4	0.00023 (12090422)
3774515.7	0.00023 (12090422)
3774496.9	0.00023 (12090422)
3774478.1	0.00023 (12090422)
3774459.4	0.00023 (12090422)
3774440.6	0.00023 (12090422)
3774421.8	0.00023 (12090422)
3774403.1	0.00023 (12090422)
3774384.3	0.00024 (12090422)
3774365.5	0.00024 (12090422)
3774346.7	0.00024 (12090422)
3774328.0	0.00024 (12090422)
3774309.2	0.00024 (12090422)
3774290.4	0.00024 (12090422)
3774271.7	0.00024 (12090422)
3774252.9	0.00024 (12090422)
3774234.1	0.00024 (12090422)

*** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

                            *** THE   1ST HIGHEST 1-HR AVERAGE CONCENTRATION
VALUES FOR SOURCE GROUP: ALL   ***
                                INCLUDING SOURCE(S):   L0001543   , L0001544
 , L0001545   , L0001546   , L0001547   ,
                 L0001548   , L0001549   , L0001550   , L0001551   , L0001552
 , L0001553   , L0001554   , L0001555   ,
                 L0001556   , L0001557   , L0001558   , L0001559   , L0001560
 , L0001561   , L0001562   , L0001563   ,
                 L0001564   , L0001565   , L0001566   , L0001567   , L0001568
 , L0001569   , L0001570   , . . .   ,

                                          *** DISCRETE CARTESIAN RECEPTOR POINTS
***

                                       ** CONC OF PM_10   IN MICROGRAMS/M**3
                  **

      X-COORD (M) Y-COORD (M)   CONC   (YYMMDDHH)   X-COORD (M)
Y-COORD (M)   CONC   (YYMMDDHH)
 -
- -
        436490.76   3772888.65   0.00108 (14111323)   436520.76
 3772888.65   0.00093 (13050603)
        436550.76   3772888.65   0.00084 (16062021)   436610.76
 3772888.65   0.00071 (13063021)
        436640.76   3772888.65   0.00065 (13063021)   436670.76
 3772888.65   0.00060 (16071205)
        436700.76   3772888.65   0.00056 (15030619)   436490.76
 3772918.65   0.00110 (14111323)
        436520.76   3772918.65   0.00094 (14092524)   436550.76
 3772918.65   0.00085 (16062021)
        436610.76   3772918.65   0.00071 (13063021)   436640.76
 3772918.65   0.00066 (13063021)
        436670.76   3772918.65   0.00060 (13063021)   436700.76
 3772918.65   0.00057 (15030619)
        436610.76   3772948.65   0.00072 (13063021)   436640.76
 3772948.65   0.00067 (13063021)
        436670.76   3772948.65   0.00061 (13063021)   436700.76
 3772948.65   0.00057 (16071205)
        436550.76   3772978.65   0.00086 (16062021)   436580.76
 3772978.65   0.00079 (16062021)
        436610.76   3772978.65   0.00073 (16062021)   436640.76

```
3772978.65        0.00067  (13063021)
       436670.76   3772978.65        0.00062  (14081124)                436700.76
3772978.65        0.00058  (14060924)
       436550.76   3773008.65        0.00087  (14092524)                436580.76
3773008.65        0.00080  (16062021)
       436610.76   3773008.65        0.00073  (16062021)                436640.76
3773008.65        0.00068  (14081124)
       436670.76   3773008.65        0.00063  (14081124)                436700.76
3773008.65        0.00058  (14081124)
       436610.76   3773038.65        0.00074  (16062021)                436640.76
3773038.65        0.00069  (14081124)
       436670.76   3773038.65        0.00065  (14081124)                436700.76
3773038.65        0.00060  (14081124)
       436610.76   3773068.65        0.00075  (16062021)                436640.76
3773068.65        0.00070  (14081124)
       436670.76   3773068.65        0.00065  (14081124)                436700.76
3773068.65        0.00061  (14081124)
       436100.76   3773098.65        0.00062  (13081905)                436130.76
3773098.65        0.00067  (13081905)
       436160.76   3773098.65        0.00074  (14120319)                436190.76
3773098.65        0.00083  (12082821)
       436220.76   3773098.65        0.00092  (12082821)                436610.76
3773098.65        0.00076  (12083003)
       436640.76   3773098.65        0.00070  (14081124)                436670.76
3773098.65        0.00066  (14081124)
       436700.76   3773098.65        0.00062  (14081124)                436100.76
3773128.65        0.00062  (13081905)
       436130.76   3773128.65        0.00067  (14080321)                436160.76
3773128.65        0.00074  (12082821)
       436190.76   3773128.65        0.00084  (12082821)                436220.76
3773128.65        0.00092  (12082821)
       436250.76   3773128.65        0.00102  (15100405)                436100.76
3773158.65        0.00062  (13081905)
       436130.76   3773158.65        0.00067  (14080321)                436160.76
3773158.65        0.00074  (12082821)
       436190.76   3773158.65        0.00084  (12082821)                436220.76
3773158.65        0.00092  (12082821)
       436250.76   3773158.65        0.00101  (15100405)                436520.76
3773158.65        0.00102  (14111323)
       436550.76   3773158.65        0.00092  (14092524)                436580.76
3773158.65        0.00083  (16062021)
       436610.76   3773158.65        0.00077  (12083003)                436640.76
3773158.65        0.00072  (12083003)
       436670.76   3773158.65        0.00068  (14081124)                436100.76
3773188.65        0.00063  (13081905)
       436130.76   3773188.65        0.00068  (14080321)                436160.76
3773188.65        0.00075  (12082821)
       436190.76   3773188.65        0.00085  (12082821)                436220.76
```

 3773188.65   0.00093 (12082821)
       436250.76   3773188.65   0.00102 (15100405)   436400.76
 3773188.65   0.00483 (15102517)
       436430.76   3773188.65   0.00199 (12100207)   436460.76
 3773188.65   0.00144 (12071301)
       436490.76   3773188.65   0.00120 (12071301)   436520.76
 3773188.65   0.00103 (14111323)
       436550.76   3773188.65   0.00094 (14092524)   436580.76
 3773188.65   0.00085 (14092524)
       436610.76   3773188.65   0.00078 (12083003)   436640.76
 3773188.65   0.00073 (12083003)

 *** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

                              *** THE   1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL   ***
                                  INCLUDING SOURCE(S):   L0001543   , L0001544
 , L0001545   , L0001546   , L0001547   ,
                 L0001548   , L0001549   , L0001550   , L0001551   , L0001552
 , L0001553   , L0001554   , L0001555   ,
                 L0001556   , L0001557   , L0001558   , L0001559   , L0001560
 , L0001561   , L0001562   , L0001563   ,
                 L0001564   , L0001565   , L0001566   , L0001567   , L0001568
 , L0001569   , L0001570   , . . .   ,

                                          *** DISCRETE CARTESIAN RECEPTOR POINTS ***

                                      ** CONC OF PM_10   IN MICROGRAMS/M**3
                    **

      X-COORD (M) Y-COORD (M)   CONC   (YYMMDDHH)   X-COORD (M) Y-COORD (M)   CONC   (YYMMDDHH)
 - - -

436310.76 3773218.65 0.00145 (12082924) 436340.76 3773218.65 0.00200 (14113016)
436370.76 3773218.65 0.00478 (15102517) 436400.76 3773218.65 0.00484 (15102517)
436430.76 3773218.65 0.00199 (12100207) 436460.76 3773218.65 0.00145 (12071301)
436490.76 3773218.65 0.00121 (12071301) 436520.76 3773218.65 0.00105 (14092524)
436550.76 3773218.65 0.00095 (14092524) 436580.76 3773218.65 0.00086 (14092524)
436610.76 3773218.65 0.00079 (12083003) 436640.76 3773218.65 0.00074 (12083003)
436670.76 3773218.65 0.00070 (14081124) 436100.76 3773248.65 0.00064 (14080321)
436130.76 3773248.65 0.00069 (12082821) 436160.76 3773248.65 0.00077 (12082821)
436190.76 3773248.65 0.00086 (12082821) 436220.76 3773248.65 0.00093 (12082821)
436250.76 3773248.65 0.00104 (15100405) 436280.76 3773248.65 0.00122 (12071204)
436310.76 3773248.65 0.00145 (12082924) 436340.76 3773248.65 0.00200 (14113016)
436370.76 3773248.65 0.00476 (15102517) 436400.76 3773248.65 0.00487 (15102517)
436430.76 3773248.65 0.00199 (12100207) 436460.76 3773248.65 0.00146 (12071301)
436490.76 3773248.65 0.00122 (12071301) 436520.76 3773248.65 0.00106 (14092524)
436550.76 3773248.65 0.00096 (14092524) 436580.76 3773248.65 0.00087 (14092524)
436610.76 3773248.65 0.00080 (12083003) 436640.76 3773248.65 0.00075 (12083003)
436670.76 3773248.65 0.00070 (14081124) 436100.76 3773278.65 0.00065 (14080321)
436130.76 3773278.65 0.00071 (12082821) 436160.76 3773278.65 0.00080 (12082821)
436190.76 3773278.65 0.00088 (12082821) 436220.76 3773278.65 0.00094 (12082821)
436250.76 3773278.65 0.00104 (16062805) 436280.76 3773278.65 0.00121 (12071204)
436310.76 3773278.65 0.00143 (12082924) 436340.76 3773278.65 0.00200 (14113016)
436370.76 3773278.65 0.00472 (15102517) 436400.76 3773278.65 0.00490 (15102517)
436430.76 3773278.65 0.00200 (12100207) 436460.76 3773278.65 0.00147 (12071301)
436490.76 3773278.65 0.00123 (12071301) 436520.76 3773278.65 0.00108 (14092524)

```
       436550.76   3773278.65        0.00098  (14092524)               436580.76
 3773278.65        0.00089  (14092524)
       436610.76   3773278.65        0.00081  (12083003)               436640.76
 3773278.65        0.00076  (12083003)
       436670.76   3773278.65        0.00071  (14081124)               436100.76
 3773308.65        0.00067  (14080321)
       436130.76   3773308.65        0.00072  (12082821)               436160.76
 3773308.65        0.00081  (12082821)
       436190.76   3773308.65        0.00089  (12082821)               436220.76
 3773308.65        0.00094  (12082821)
       436250.76   3773308.65        0.00104  (15070705)               436280.76
 3773308.65        0.00121  (12071204)
       436310.76   3773308.65        0.00144  (14101504)               436340.76
 3773308.65        0.00200  (14113016)
       436370.76   3773308.65        0.00468  (15102517)               436400.76
 3773308.65        0.00492  (15102517)
       436430.76   3773308.65        0.00200  (12100207)               436460.76
 3773308.65        0.00148  (12071301)
       436490.76   3773308.65        0.00125  (12071301)               436520.76
 3773308.65        0.00109  (14092524)
       436550.76   3773308.65        0.00099  (14092524)               436580.76
 3773308.65        0.00090  (14092524)
       436610.76   3773308.65        0.00082  (12083003)               436640.76
 3773308.65        0.00077  (12083003)
 *** AERMOD - VERSION  19191 ***   *** C:\Lakes\AERMOD View\Bridge Upland\Bridge
Upland.isc                  ***        01/15/20
 *** AERMET - VERSION  16216 ***   ***
                          ***        13:48:55

                                    PAGE  87
 *** MODELOPTs:    RegDFAULT  CONC  ELEV  URBAN  ADJ_U*

                               *** THE   1ST HIGHEST  1-HR AVERAGE CONCENTRATION
VALUES FOR SOURCE GROUP:  ALL      ***
                                  INCLUDING SOURCE(S):     L0001543    , L0001544
 , L0001545    , L0001546    , L0001547    ,
                 L0001548    , L0001549    , L0001550    , L0001551    , L0001552
 , L0001553    , L0001554    , L0001555    ,
                 L0001556    , L0001557    , L0001558    , L0001559    , L0001560
 , L0001561    , L0001562    , L0001563    ,
                 L0001564    , L0001565    , L0001566    , L0001567    , L0001568
 , L0001569    , L0001570    ,  . . .      ,

                                        *** DISCRETE CARTESIAN RECEPTOR POINTS
***

                                     ** CONC OF PM_10    IN MICROGRAMS/M**3
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X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)	X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)
436670.76	3773308.65	0.00071	(14081124)	436100.76	3773338.65	0.00068	(14080321)
436130.76	3773338.65	0.00073	(12082821)	436160.76	3773338.65	0.00081	(12082821)
436190.76	3773338.65	0.00089	(12082821)	436220.76	3773338.65	0.00095	(12082821)
436250.76	3773338.65	0.00105	(15070705)	436280.76	3773338.65	0.00121	(12071204)
436310.76	3773338.65	0.00144	(14101504)	436340.76	3773338.65	0.00199	(14113016)
436370.76	3773338.65	0.00464	(15102517)	436400.76	3773338.65	0.00495	(15102517)
436430.76	3773338.65	0.00201	(13012217)	436460.76	3773338.65	0.00150	(12071301)
436490.76	3773338.65	0.00126	(12071301)	436520.76	3773338.65	0.00110	(14092524)
436550.76	3773338.65	0.00100	(14092524)	436580.76	3773338.65	0.00091	(14092524)
436610.76	3773338.65	0.00082	(12083003)	436640.76	3773338.65	0.00077	(12083003)
436670.76	3773338.65	0.00072	(12083003)	436100.76	3773368.65	0.00069	(14080321)
436130.76	3773368.65	0.00074	(12082821)	436160.76	3773368.65	0.00082	(12082821)
436190.76	3773368.65	0.00089	(12082821)	436220.76	3773368.65	0.00095	(12082821)
436250.76	3773368.65	0.00105	(15070705)	436280.76	3773368.65	0.00122	(12071204)
436310.76	3773368.65	0.00145	(14101504)	436340.76	3773368.65	0.00198	(14113016)
436370.76	3773368.65	0.00461	(15102517)	436400.76	3773368.65	0.00498	(15102517)
436430.76	3773368.65	0.00202	(13012217)	436460.76	3773368.65	0.00151	(12071301)
436490.76	3773368.65	0.00127	(12071301)	436520.76	3773368.65	0.00111	(14092524)
436550.76	3773368.65	0.00101	(14092524)	436580.76	3773368.65	0.00092	(14092524)
436610.76	3773368.65	0.00083	(12083003)	436640.76	3773368.65	0.00078	(12083003)
436670.76	3773368.65	0.00073	(12083003)	436100.76	3773398.65	0.00070	(14080321)
436130.76	3773398.65	0.00075	(12082821)	436160.76			

3773398.65 0.00083 (12082821)
436190.76 3773398.65 0.00090 (12082821) 436220.76
3773398.65 0.00097 (12082821)
436250.76 3773398.65 0.00108 (15070705) 436280.76
3773398.65 0.00124 (12071204)
436310.76 3773398.65 0.00148 (12082924) 436340.76
3773398.65 0.00198 (14113016)
436370.76 3773398.65 0.00460 (15102517) 436400.76
3773398.65 0.00501 (15102517)
436430.76 3773398.65 0.00203 (14101121) 436460.76
3773398.65 0.00153 (12071301)
436490.76 3773398.65 0.00128 (12071301) 436520.76
3773398.65 0.00112 (13081902)
436550.76 3773398.65 0.00102 (14092524) 436580.76
3773398.65 0.00093 (14092524)
436610.76 3773398.65 0.00084 (15081724) 436640.76
3773398.65 0.00079 (12083003)
436670.76 3773398.65 0.00073 (12083003) 437509.68
3774019.01 0.00025 (12080622)
437522.02 3774019.01 0.00025 (12080622) 437534.36
3774019.01 0.00025 (12080622)
437546.70 3774019.01 0.00024 (12080622) 437559.04
3774019.01 0.00024 (12080622)
437509.68 3774027.34 0.00025 (12080622) 437522.02
3774027.34 0.00025 (12080622)
437534.36 3774027.34 0.00025 (12080622) 437546.70
3774027.34 0.00024 (12080622)
437559.04 3774027.34 0.00024 (12080622) 437509.68
3774035.67 0.00025 (12080622)
437522.02 3774035.67 0.00025 (12080622) 437534.36
3774035.67 0.00025 (12080622)
437546.70 3774035.67 0.00024 (12080622) 437559.04
3774035.67 0.00024 (12080622)
437509.68 3774044.00 0.00025 (12080622) 437522.02
3774044.00 0.00025 (12080622)
437534.36 3774044.00 0.00025 (12080622) 437546.70
3774044.00 0.00024 (12080622)

*** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): L0001543 , L0001544

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 , L0001545    , L0001546    , L0001547    ,
                 L0001548    , L0001549    , L0001550    , L0001551    , L0001552
 , L0001553    , L0001554    , L0001555    ,
                 L0001556    , L0001557    , L0001558    , L0001559    , L0001560
 , L0001561    , L0001562    , L0001563    ,
                 L0001564    , L0001565    , L0001566    , L0001567    , L0001568
 , L0001569    , L0001570    ,  . . .      ,
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*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF PM_10 IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)	X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)
437559.04	3774044.00	0.00024	(12080622)	437509.68	3774052.33	0.00025	(12080622)
437522.02	3774052.33	0.00025	(12080622)	437534.36	3774052.33	0.00025	(12080622)
437546.70	3774052.33	0.00024	(12080622)	437559.04	3774052.33	0.00024	(12080622)
437509.68	3774060.66	0.00025	(12080622)	437522.02	3774060.66	0.00025	(12080622)
437534.36	3774060.66	0.00025	(12080622)	437546.70	3774060.66	0.00024	(12080622)
437559.04	3774060.66	0.00024	(12080622)	437509.68	3774068.99	0.00025	(12080622)
437522.02	3774068.99	0.00025	(12080622)	437534.36	3774068.99	0.00025	(12080622)
437546.70	3774068.99	0.00024	(12080622)	437559.04	3774068.99	0.00024	(12080622)
437509.68	3774077.32	0.00025	(12090422)	437522.02	3774077.32	0.00025	(12080622)
437534.36	3774077.32	0.00025	(12080622)	437546.70	3774077.32	0.00024	(12080622)
437559.04	3774077.32	0.00024	(12080622)	437509.68	3774085.65	0.00025	(12090422)
437522.02	3774085.65	0.00025	(12080622)	437534.36	3774085.65	0.00025	(12080622)
437546.70	3774085.65	0.00024	(12080622)	437559.04	3774085.65	0.00024	(12080622)
437509.68	3774093.98	0.00025	(12090422)	437522.02	3774093.98	0.00025	(12090422)
437534.36	3774093.98	0.00024	(12080622)	437546.70	3774093.98	0.00024	(12080622)

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       437559.04   3774093.98        0.00024  (12080622)              437509.68
3774102.31        0.00025  (12090422)
       437522.02   3774102.31        0.00025  (12090422)              437534.36
3774102.31        0.00024  (12080622)
       437546.70   3774102.31        0.00024  (12080622)              437559.04
3774102.31        0.00024  (12080622)
       437509.68   3774110.64        0.00025  (12090422)              437522.02
3774110.64        0.00025  (12090422)
       437534.36   3774110.64        0.00024  (12080622)              437546.70
3774110.64        0.00024  (12080622)
       437559.04   3774110.64        0.00024  (12080622)              437571.38
3774110.64        0.00024  (12080622)
       437583.72   3774110.64        0.00024  (12080622)              437596.06
3774110.64        0.00023  (12080622)
       437608.40   3774110.64        0.00023  (12080622)              437620.74
3774110.64        0.00023  (12080622)
       437633.08   3774110.64        0.00023  (12080622)              437645.42
3774110.64        0.00022  (12080622)
       437657.76   3774110.64        0.00022  (12080622)              437670.10
3774110.64        0.00022  (12080622)
       437682.44   3774110.64        0.00022  (14072524)              437694.78
3774110.64        0.00022  (14072524)
       437707.12   3774110.64        0.00022  (14072524)              437719.46
3774110.64        0.00021  (15062822)
       437731.80   3774110.64        0.00021  (15062822)              437744.14
3774110.64        0.00021  (15062822)
       437756.48   3774110.64        0.00021  (15062822)              437509.68
3774118.97        0.00025  (12090422)
       437522.02   3774118.97        0.00025  (12090422)              437534.36
3774118.97        0.00024  (12080622)
       437546.70   3774118.97        0.00024  (12080622)              437559.04
3774118.97        0.00024  (12080622)
       437571.38   3774118.97        0.00024  (12080622)              437583.72
3774118.97        0.00024  (12080622)
       437596.06   3774118.97        0.00023  (12080622)              437608.40
3774118.97        0.00023  (12080622)
       437620.74   3774118.97        0.00023  (12080622)              437633.08
3774118.97        0.00023  (12080622)
       437645.42   3774118.97        0.00022  (12080622)              437657.76
3774118.97        0.00022  (12080622)
       437670.10   3774118.97        0.00022  (12080622)              437682.44
3774118.97        0.00022  (14072524)
       437694.78   3774118.97        0.00022  (14072524)              437707.12
3774118.97        0.00022  (14072524)
       437719.46   3774118.97        0.00021  (14072524)              437731.80
3774118.97        0.00021  (15062822)
       437744.14   3774118.97        0.00021  (15062822)              437756.48
3774118.97        0.00021  (15062822)
```

       437509.68   3774127.30   0.00025 (12090422)   437522.02
 3774127.30   0.00025 (12090422)
 *** AERMOD - VERSION 19191 ***   *** C:\Lakes\AERMOD View\Bridge Upland\Bridge
Upland.isc   ***   01/15/20
 *** AERMET - VERSION 16216 ***   ***
                         ***   13:48:55

 *** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

                              *** THE   1ST HIGHEST 1-HR AVERAGE CONCENTRATION
VALUES FOR SOURCE GROUP: ALL   ***
                                INCLUDING SOURCE(S):   L0001543   , L0001544
 , L0001545   , L0001546   , L0001547   ,
                 L0001548   , L0001549   , L0001550   , L0001551   , L0001552
 , L0001553   , L0001554   , L0001555   ,
                 L0001556   , L0001557   , L0001558   , L0001559   , L0001560
 , L0001561   , L0001562   , L0001563   ,
                 L0001564   , L0001565   , L0001566   , L0001567   , L0001568
 , L0001569   , L0001570   , . . .   ,

                                          *** DISCRETE CARTESIAN RECEPTOR POINTS
***

                                       ** CONC OF PM_10   IN MICROGRAMS/M**3
                  **

      X-COORD (M) Y-COORD (M)   CONC   (YYMMDDHH)   X-COORD (M)
Y-COORD (M)   CONC   (YYMMDDHH)
 -
- -
       437534.36   3774127.30   0.00024 (12090422)   437546.70
 3774127.30   0.00024 (12080622)
       437559.04   3774127.30   0.00024 (12080622)   437571.38
 3774127.30   0.00024 (12080622)
       437583.72   3774127.30   0.00024 (12080622)   437596.06
 3774127.30   0.00023 (12080622)
       437608.40   3774127.30   0.00023 (12080622)   437620.74
 3774127.30   0.00023 (12080622)
       437633.08   3774127.30   0.00023 (12080622)   437645.42
 3774127.30   0.00022 (12080622)
       437657.76   3774127.30   0.00022 (12080622)   437670.10
 3774127.30   0.00022 (12080622)
       437682.44   3774127.30   0.00022 (14072524)   437694.78
 3774127.30   0.00022 (14072524)
       437707.12   3774127.30   0.00022 (14072524)   437719.46
 3774127.30   0.00021 (14072524)
       437731.80   3774127.30   0.00021 (15062822)   437744.14

```
3774127.30        0.00021  (15062822)
       437756.48   3774127.30        0.00021  (15062822)                437509.68
3774135.63        0.00025  (12090422)
       437522.02   3774135.63        0.00025  (12090422)                437534.36
3774135.63        0.00024  (12090422)
       437546.70   3774135.63        0.00024  (12080622)                437559.04
3774135.63        0.00024  (12080622)
       437571.38   3774135.63        0.00024  (12080622)                437583.72
3774135.63        0.00024  (12080622)
       437596.06   3774135.63        0.00023  (12080622)                437608.40
3774135.63        0.00023  (12080622)
       437620.74   3774135.63        0.00023  (12080622)                437633.08
3774135.63        0.00023  (12080622)
       437645.42   3774135.63        0.00022  (12080622)                437657.76
3774135.63        0.00022  (12080622)
       437670.10   3774135.63        0.00022  (12080622)                437682.44
3774135.63        0.00022  (12080622)
       437694.78   3774135.63        0.00022  (14072524)                437707.12
3774135.63        0.00022  (14072524)
       437719.46   3774135.63        0.00021  (14072524)                437731.80
3774135.63        0.00021  (15062822)
       437744.14   3774135.63        0.00021  (15062822)                437756.48
3774135.63        0.00021  (15062822)
       437509.68   3774143.96        0.00025  (12090422)                437522.02
3774143.96        0.00025  (12090422)
       437534.36   3774143.96        0.00024  (12090422)                437546.70
3774143.96        0.00024  (12080622)
       437559.04   3774143.96        0.00024  (12080622)                437571.38
3774143.96        0.00024  (12080622)
       437583.72   3774143.96        0.00023  (12080622)                437596.06
3774143.96        0.00023  (12080622)
       437608.40   3774143.96        0.00023  (12080622)                437620.74
3774143.96        0.00023  (12080622)
       437633.08   3774143.96        0.00023  (12080622)                437645.42
3774143.96        0.00022  (12080622)
       437657.76   3774143.96        0.00022  (12080622)                437670.10
3774143.96        0.00022  (12080622)
       437682.44   3774143.96        0.00022  (12080622)                437694.78
3774143.96        0.00022  (14072524)
       437707.12   3774143.96        0.00021  (14072524)                437719.46
3774143.96        0.00021  (14072524)
       437731.80   3774143.96        0.00021  (15062822)                437744.14
3774143.96        0.00021  (15062822)
       437756.48   3774143.96        0.00021  (15062822)                437509.68
3774152.29        0.00025  (12090422)
       437522.02   3774152.29        0.00025  (12090422)                437534.36
3774152.29        0.00024  (12090422)
       437546.70   3774152.29        0.00024  (12090422)                437559.04
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3774152.29 0.00024 (12080622)
437571.38 3774152.29 0.00024 (12080622) 437583.72
3774152.29 0.00023 (12080622)
437596.06 3774152.29 0.00023 (12080622) 437608.40
3774152.29 0.00023 (12080622)
437620.74 3774152.29 0.00023 (12080622) 437633.08
3774152.29 0.00023 (12080622)
437645.42 3774152.29 0.00022 (12080622) 437657.76
3774152.29 0.00022 (12080622)
437670.10 3774152.29 0.00022 (12080622) 437682.44
3774152.29 0.00022 (12080622)
437694.78 3774152.29 0.00022 (14072524) 437707.12
3774152.29 0.00021 (14072524)
437719.46 3774152.29 0.00021 (14072524) 437731.80
3774152.29 0.00021 (15062822)

*** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): L0001543 , L0001544 , L0001545 , L0001546 , L0001547 ,
L0001548 , L0001549 , L0001550 , L0001551 , L0001552 , L0001553 , L0001554 , L0001555 ,
L0001556 , L0001557 , L0001558 , L0001559 , L0001560 , L0001561 , L0001562 , L0001563 ,
L0001564 , L0001565 , L0001566 , L0001567 , L0001568 , L0001569 , L0001570 , . . . ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF PM_10 IN MICROGRAMS/M**3 **

X-COORD (M) Y-COORD (M) CONC (YYMMDDHH) X-COORD (M) Y-COORD (M) CONC (YYMMDDHH)
- - - -

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       437534.36   3774160.62        0.00024  (12090422)              437546.70
3774160.62         0.00024  (12090422)
       437559.04   3774160.62        0.00024  (12080622)              437571.38
3774160.62         0.00024  (12080622)
       437583.72   3774160.62        0.00023  (12080622)              437596.06
3774160.62         0.00023  (12080622)
       437608.40   3774160.62        0.00023  (12080622)              437620.74
3774160.62         0.00023  (12080622)
       437633.08   3774160.62        0.00023  (12080622)              437645.42
3774160.62         0.00022  (12080622)
       437657.76   3774160.62        0.00022  (12080622)              437670.10
3774160.62         0.00022  (12080622)
       437682.44   3774160.62        0.00022  (12080622)              437694.78
3774160.62         0.00022  (12080622)
       437707.12   3774160.62        0.00021  (14072524)              437719.46
3774160.62         0.00021  (14072524)
       437731.80   3774160.62        0.00021  (14072524)              437744.14
3774160.62         0.00021  (15062822)
       437756.48   3774160.62        0.00021  (15062822)              437509.68
3774168.95         0.00025  (12090422)
       437522.02   3774168.95        0.00025  (12090422)              437534.36
3774168.95         0.00024  (12090422)
       437546.70   3774168.95        0.00024  (12090422)              437559.04
3774168.95         0.00024  (12080622)
       437571.38   3774168.95        0.00024  (12080622)              437583.72
3774168.95         0.00023  (12080622)
       437596.06   3774168.95        0.00023  (12080622)              437608.40
3774168.95         0.00023  (12080622)
       437620.74   3774168.95        0.00023  (12080622)              437633.08
3774168.95         0.00023  (12080622)
       437645.42   3774168.95        0.00022  (12080622)              437657.76
3774168.95         0.00022  (12080622)
       437670.10   3774168.95        0.00022  (12080622)              437682.44
3774168.95         0.00022  (12080622)
       437694.78   3774168.95        0.00022  (12080622)              437707.12
3774168.95         0.00021  (14072524)
       437719.46   3774168.95        0.00021  (14072524)              437731.80
3774168.95         0.00021  (14072524)
       437744.14   3774168.95        0.00021  (15062822)              437756.48
3774168.95         0.00021  (15062822)
       437509.68   3774177.28        0.00025  (12090422)              437522.02
3774177.28         0.00025  (12090422)
       437534.36   3774177.28        0.00024  (12090422)              437546.70
3774177.28         0.00024  (12090422)
       437559.04   3774177.28        0.00024  (12080622)              437571.38
3774177.28         0.00024  (12080622)
       437583.72   3774177.28        0.00023  (12080622)              437596.06
3774177.28         0.00023  (12080622)
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       437608.40   3774177.28        0.00023  (12080622)               437620.74
 3774177.28        0.00023  (12080622)
       437633.08   3774177.28        0.00023  (12080622)               437645.42
 3774177.28        0.00022  (12080622)
       437657.76   3774177.28        0.00022  (12080622)               437670.10
 3774177.28        0.00022  (12080622)
       437682.44   3774177.28        0.00022  (12080622)               437694.78
 3774177.28        0.00022  (12080622)
       437707.12   3774177.28        0.00021  (14072524)               437719.46
 3774177.28        0.00021  (14072524)
       437731.80   3774177.28        0.00021  (14072524)               437744.14
 3774177.28        0.00021  (15062822)
       437756.48   3774177.28        0.00021  (15062822)               437509.68
 3774185.61        0.00025  (12090422)
       437522.02   3774185.61        0.00025  (12090422)               437534.36
 3774185.61        0.00024  (12090422)
       437546.70   3774185.61        0.00024  (12090422)               437559.04
 3774185.61        0.00024  (12090422)
       437571.38   3774185.61        0.00024  (12080622)               437583.72
 3774185.61        0.00023  (12080622)
       437596.06   3774185.61        0.00023  (12080622)               437608.40
 3774185.61        0.00023  (12080622)
       437620.74   3774185.61        0.00023  (12080622)               437633.08
 3774185.61        0.00023  (12080622)
       437645.42   3774185.61        0.00022  (12080622)               437657.76
 3774185.61        0.00022  (12080622)
       437670.10   3774185.61        0.00022  (12080622)               437682.44
 3774185.61        0.00022  (12080622)
```



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 *** MODELOPTs:    RegDFAULT  CONC  ELEV  URBAN  ADJ_U*

                               *** THE   1ST HIGHEST  1-HR AVERAGE CONCENTRATION
VALUES FOR SOURCE GROUP:  ALL      ***
                                  INCLUDING SOURCE(S):     L0001543    , L0001544
 , L0001545    , L0001546    , L0001547    ,
                 L0001548    , L0001549    , L0001550    , L0001551    , L0001552
 , L0001553    , L0001554    , L0001555    ,
                 L0001556    , L0001557    , L0001558    , L0001559    , L0001560
 , L0001561    , L0001562    , L0001563    ,
                 L0001564    , L0001565    , L0001566    , L0001567    , L0001568
 , L0001569    , L0001570    ,  . . .      ,

                                                *** DISCRETE CARTESIAN RECEPTOR POINTS
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** CONC OF PM_10 IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)	X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)
437694.78	3774185.61	0.00022	(12080622)	437707.12	3774185.61	0.00021	(12080622)
437719.46	3774185.61	0.00021	(14072524)	437731.80	3774185.61	0.00021	(14072524)
437744.14	3774185.61	0.00021	(15062822)	437756.48	3774185.61	0.00021	(15062822)
436401.45	3773426.38	0.00487	(15102517)	436409.59	3773426.38	0.00340	(15102517)
436417.73	3773426.38	0.00262	(13012217)	436425.87	3773426.38	0.00221	(13012217)
436434.01	3773426.38	0.00198	(14101121)	436442.15	3773426.38	0.00181	(14101121)
436450.29	3773426.38	0.00167	(14101121)	436458.43	3773426.38	0.00158	(12071301)
436466.57	3773426.38	0.00149	(12071301)	436474.71	3773426.38	0.00142	(12071301)
436482.85	3773426.38	0.00135	(12071301)	436490.99	3773426.38	0.00129	(12071301)
436499.13	3773426.38	0.00124	(12071301)	436507.27	3773426.38	0.00119	(12071301)
436515.41	3773426.38	0.00115	(13081902)	436523.55	3773426.38	0.00112	(13081902)
436531.69	3773426.38	0.00109	(14092524)	436539.83	3773426.38	0.00107	(14092524)
436547.97	3773426.38	0.00104	(14092524)	436556.11	3773426.38	0.00101	(14092524)
436401.45	3773445.23	0.00487	(15102517)	436409.59	3773445.23	0.00338	(15102517)
436417.73	3773445.23	0.00263	(13012217)	436425.87	3773445.23	0.00223	(14080219)
436434.01	3773445.23	0.00200	(14101121)	436442.15	3773445.23	0.00183	(14101121)
436450.29	3773445.23	0.00170	(14101121)	436458.43	3773445.23	0.00159	(12071301)
436466.57	3773445.23	0.00151	(12071301)	436474.71	3773445.23	0.00143	(12071301)
436482.85	3773445.23	0.00137	(12071301)	436490.99	3773445.23	0.00130	(12071301)
436499.13	3773445.23	0.00125	(12071301)	436507.27			

```
 3773445.23        0.00120  (12071301)
       436515.41   3773445.23        0.00116  (13081902)                436523.55
 3773445.23        0.00113  (13081902)
       436531.69   3773445.23        0.00110  (14092524)                436539.83
 3773445.23        0.00108  (14092524)
       436547.97   3773445.23        0.00105  (14092524)                436556.11
 3773445.23        0.00102  (14092524)
       436401.45   3773464.08        0.00489  (15102517)                436409.59
 3773464.08        0.00340  (15102517)
       436417.73   3773464.08        0.00263  (13012217)                436425.87
 3773464.08        0.00223  (14080219)
       436434.01   3773464.08        0.00200  (14101121)                436442.15
 3773464.08        0.00183  (14101121)
       436450.29   3773464.08        0.00170  (14101121)                436458.43
 3773464.08        0.00160  (12071301)
       436466.57   3773464.08        0.00151  (12071301)                436474.71
 3773464.08        0.00144  (12071301)
       436482.85   3773464.08        0.00138  (12071301)                436490.99
 3773464.08        0.00132  (12071301)
       436499.13   3773464.08        0.00126  (12071301)                436507.27
 3773464.08        0.00121  (13081902)
       436515.41   3773464.08        0.00118  (13081902)                436523.55
 3773464.08        0.00115  (13081902)
       436531.69   3773464.08        0.00112  (14092524)                436539.83
 3773464.08        0.00109  (14092524)
       436547.97   3773464.08        0.00107  (14092524)                436556.11
 3773464.08        0.00103  (14092524)
       436401.45   3773482.93        0.00490  (15102517)                436409.59
 3773482.93        0.00342  (15102517)
       436417.73   3773482.93        0.00263  (13012217)                436425.87
 3773482.93        0.00224  (14080219)
       436434.01   3773482.93        0.00201  (14101121)                436442.15
 3773482.93        0.00184  (14101121)
       436450.29   3773482.93        0.00171  (14101121)                436458.43
 3773482.93        0.00160  (12071301)
       436466.57   3773482.93        0.00153  (12071301)                436474.71
 3773482.93        0.00146  (12071301)
       436482.85   3773482.93        0.00139  (12071301)                436490.99
 3773482.93        0.00133  (12071301)
       436499.13   3773482.93        0.00128  (12071301)                436507.27
 3773482.93        0.00123  (13081902)
 *** AERMOD - VERSION  19191 ***   *** C:\Lakes\AERMOD View\Bridge Upland\Bridge
Upland.isc                  ***        01/15/20
 *** AERMET - VERSION  16216 ***   ***
                          ***        13:48:55

                                    PAGE  92
 *** MODELOPTs:    RegDFAULT  CONC  ELEV  URBAN  ADJ_U*
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*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): L0001543 , L0001544 , L0001545 , L0001546 , L0001547 ,
L0001548 , L0001549 , L0001550 , L0001551 , L0001552 , L0001553 , L0001554 , L0001555 ,
L0001556 , L0001557 , L0001558 , L0001559 , L0001560 , L0001561 , L0001562 , L0001563 ,
L0001564 , L0001565 , L0001566 , L0001567 , L0001568 , L0001569 , L0001570 , . . . ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF PM_10 IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)	X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)
436515.41	3773482.93	0.00120	(13081902)	436523.55	3773482.93	0.00116	(13081902)
436531.69	3773482.93	0.00113	(14092524)	436539.83	3773482.93	0.00110	(14092524)
436547.97	3773482.93	0.00107	(14092524)	436556.11	3773482.93	0.00104	(14092524)
436401.45	3773501.78	0.00492	(15102517)	436409.59	3773501.78	0.00344	(15102517)
436417.73	3773501.78	0.00264	(13012217)	436425.87	3773501.78	0.00224	(14080219)
436434.01	3773501.78	0.00202	(14101121)	436442.15	3773501.78	0.00185	(14101121)
436450.29	3773501.78	0.00172	(14101121)	436458.43	3773501.78	0.00162	(12071301)
436466.57	3773501.78	0.00155	(12071301)	436474.71	3773501.78	0.00148	(12071301)
436482.85	3773501.78	0.00141	(12071301)	436490.99	3773501.78	0.00135	(12071301)
436499.13	3773501.78	0.00129	(15100418)	436507.27	3773501.78	0.00125	(13081902)
436515.41	3773501.78	0.00121	(13081902)	436523.55	3773501.78	0.00117	(13081902)
436531.69	3773501.78	0.00114	(14092524)	436539.83	3773501.78	0.00111	(14092524)
436547.97	3773501.78	0.00108	(14092524)	436556.11	3773501.78	0.00104	(14092524)

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       436401.45   3773520.63        0.00492  (15102517)              436409.59
3773520.63        0.00345  (15102517)
       436417.73   3773520.63        0.00264  (13012217)              436425.87
3773520.63        0.00225  (14080219)
       436434.01   3773520.63        0.00202  (14101121)              436442.15
3773520.63        0.00186  (14101121)
       436450.29   3773520.63        0.00173  (14101121)              436458.43
3773520.63        0.00163  (15070605)
       436466.57   3773520.63        0.00155  (12071301)              436474.71
3773520.63        0.00148  (12071301)
       436482.85   3773520.63        0.00142  (12071301)              436490.99
3773520.63        0.00135  (12071301)
       436499.13   3773520.63        0.00130  (15100418)              436507.27
3773520.63        0.00125  (13081902)
       436515.41   3773520.63        0.00121  (13081902)              436523.55
3773520.63        0.00117  (13081902)
       436531.69   3773520.63        0.00114  (14092524)              436539.83
3773520.63        0.00111  (14092524)
       436547.97   3773520.63        0.00108  (14092524)              436556.11
3773520.63        0.00105  (14092524)
       436401.45   3773539.48        0.00493  (15102517)              436409.59
3773539.48        0.00345  (15102517)
       436417.73   3773539.48        0.00264  (13012217)              436425.87
3773539.48        0.00225  (14080219)
       436434.01   3773539.48        0.00203  (14101121)              436442.15
3773539.48        0.00186  (14101121)
       436450.29   3773539.48        0.00173  (14101121)              436458.43
3773539.48        0.00163  (15070605)
       436466.57   3773539.48        0.00155  (12071301)              436474.71
3773539.48        0.00148  (12071301)
       436482.85   3773539.48        0.00141  (12071301)              436490.99
3773539.48        0.00135  (12071301)
       436499.13   3773539.48        0.00129  (15100418)              436507.27
3773539.48        0.00125  (15100418)
       436515.41   3773539.48        0.00121  (13081902)              436523.55
3773539.48        0.00117  (13081902)
       436531.69   3773539.48        0.00113  (13081902)              436539.83
3773539.48        0.00111  (14092524)
       436547.97   3773539.48        0.00108  (14092524)              436556.11
3773539.48        0.00105  (14092524)
       436401.45   3773558.33        0.00494  (15102517)              436409.59
3773558.33        0.00346  (15102517)
       436417.73   3773558.33        0.00264  (13012217)              436425.87
3773558.33        0.00225  (14080219)
       436434.01   3773558.33        0.00203  (14101121)              436442.15
3773558.33        0.00186  (14101121)
       436450.29   3773558.33        0.00172  (14101121)              436458.43
3773558.33        0.00162  (15070605)
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436466.57 3773558.33 0.00153 (15070605) 436474.71 3773558.33 0.00146 (12071301)
436482.85 3773558.33 0.00140 (12071301) 436490.99 3773558.33 0.00134 (12071301)
436499.13 3773558.33 0.00129 (15100418) 436507.27 3773558.33 0.00124 (15100418)

*** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): L0001543 , L0001544 , L0001545 , L0001546 , L0001547 ,
L0001548 , L0001549 , L0001550 , L0001551 , L0001552 , L0001553 , L0001554 , L0001555 ,
L0001556 , L0001557 , L0001558 , L0001559 , L0001560 , L0001561 , L0001562 , L0001563 ,
L0001564 , L0001565 , L0001566 , L0001567 , L0001568 , L0001569 , L0001570 , . . . ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF PM_10 IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)	X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)
436515.41	3773558.33	0.00120	(13081902)	436523.55	3773558.33	0.00117	(13081902)
436531.69	3773558.33	0.00113	(13081902)	436539.83	3773558.33	0.00110	(14092524)
436547.97	3773558.33	0.00108	(14092524)	436556.11	3773558.33	0.00105	(14092524)
436401.45	3773577.18	0.00495	(15102517)	436409.59	3773577.18	0.00347	(15102517)
436417.73	3773577.18	0.00264	(13012217)	436425.87	3773577.18	0.00226	(14080219)
436434.01	3773577.18	0.00203	(14101121)	436442.15	3773577.18	0.00186	(14101121)
436450.29	3773577.18	0.00173	(14101121)	436458.43			

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3773577.18        0.00162  (15070605)
       436466.57   3773577.18        0.00153  (15070605)                436474.71
3773577.18        0.00146  (12071301)
       436482.85   3773577.18        0.00140  (12071301)                436490.99
3773577.18        0.00134  (12071301)
       436499.13   3773577.18        0.00129  (15100418)                436507.27
3773577.18        0.00124  (15100418)
       436515.41   3773577.18        0.00120  (13081902)                436523.55
3773577.18        0.00117  (13081902)
       436531.69   3773577.18        0.00113  (13081902)                436539.83
3773577.18        0.00111  (14092524)
       436547.97   3773577.18        0.00108  (14092524)                436556.11
3773577.18        0.00105  (14092524)
       436401.45   3773596.03        0.00495  (15102517)                436409.59
3773596.03        0.00347  (15102517)
       436417.73   3773596.03        0.00264  (13012217)                436425.87
3773596.03        0.00226  (14080219)
       436434.01   3773596.03        0.00203  (14101121)                436442.15
3773596.03        0.00187  (14101121)
       436450.29   3773596.03        0.00173  (14101121)                436458.43
3773596.03        0.00163  (15070605)
       436466.57   3773596.03        0.00154  (15070605)                436474.71
3773596.03        0.00146  (12071502)
       436482.85   3773596.03        0.00140  (12071301)                436490.99
3773596.03        0.00134  (12071301)
       436499.13   3773596.03        0.00129  (15100418)                436507.27
3773596.03        0.00125  (15100418)
       436515.41   3773596.03        0.00120  (13081902)                436523.55
3773596.03        0.00117  (13081902)
       436531.69   3773596.03        0.00114  (13081902)                436539.83
3773596.03        0.00111  (14092524)
       436547.97   3773596.03        0.00109  (14092524)                436556.11
3773596.03        0.00106  (14092524)
       436401.45   3773614.88        0.00496  (15102517)                436409.59
3773614.88        0.00348  (15102517)
       436417.73   3773614.88        0.00265  (13012217)                436425.87
3773614.88        0.00228  (14080219)
       436434.01   3773614.88        0.00206  (14101121)                436442.15
3773614.88        0.00189  (14101121)
       436450.29   3773614.88        0.00176  (14101121)                436458.43
3773614.88        0.00165  (15070605)
       436466.57   3773614.88        0.00156  (15070605)                436474.71
3773614.88        0.00149  (12071502)
       436482.85   3773614.88        0.00142  (12071301)                436490.99
3773614.88        0.00137  (15100418)
       436499.13   3773614.88        0.00132  (15100418)                436507.27
3773614.88        0.00127  (15100418)
       436515.41   3773614.88        0.00123  (13081902)                436523.55
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 3773614.88        0.00119  (13081902)
       436531.69   3773614.88        0.00116  (13081902)                436539.83
 3773614.88        0.00112  (14092524)
       436547.97   3773614.88        0.00109  (14092524)                436556.11
 3773614.88        0.00107  (14092524)
       436401.45   3773633.73        0.00498  (15102517)                436409.59
 3773633.73        0.00349  (15102517)
       436417.73   3773633.73        0.00266  (13012217)                436425.87
 3773633.73        0.00231  (14080219)
       436434.01   3773633.73        0.00208  (14101121)                436442.15
 3773633.73        0.00191  (14101121)
       436450.29   3773633.73        0.00178  (14101121)                436458.43
 3773633.73        0.00167  (15070605)
       436466.57   3773633.73        0.00158  (15070605)                436474.71
 3773633.73        0.00151  (12071502)
       436482.85   3773633.73        0.00144  (12071502)                436490.99
 3773633.73        0.00139  (15100418)
       436401.45   3773652.58        0.00499  (15102517)                436409.59
 3773652.58        0.00349  (15102517)
```



```
 *** MODELOPTs:    RegDFAULT  CONC  ELEV  URBAN  ADJ_U*

                               *** THE   1ST HIGHEST  1-HR AVERAGE CONCENTRATION
VALUES FOR SOURCE GROUP:  ALL      ***
                                  INCLUDING SOURCE(S):     L0001543    , L0001544
 , L0001545    , L0001546    , L0001547    ,
                 L0001548    , L0001549    , L0001550    , L0001551    , L0001552
 , L0001553    , L0001554    , L0001555    ,
                 L0001556    , L0001557    , L0001558    , L0001559    , L0001560
 , L0001561    , L0001562    , L0001563    ,
                 L0001564    , L0001565    , L0001566    , L0001567    , L0001568
 , L0001569    , L0001570    ,  . . .      ,

                                                *** DISCRETE CARTESIAN RECEPTOR POINTS
***

                                             ** CONC OF PM_10    IN MICROGRAMS/M**3
                  **

      X-COORD (M)  Y-COORD (M)        CONC     (YYMMDDHH)              X-COORD (M)
Y-COORD (M)        CONC     (YYMMDDHH)
 - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
- - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
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436417.73 3773652.58 0.00266 (13012217) 436425.87 3773652.58 0.00232 (14080219)
436434.01 3773652.58 0.00209 (14101121) 436442.15 3773652.58 0.00192 (14101121)
436450.29 3773652.58 0.00179 (14101121) 436458.43 3773652.58 0.00168 (15070605)
436466.57 3773652.58 0.00159 (15070605) 436474.71 3773652.58 0.00152 (12071502)
436482.85 3773652.58 0.00145 (12071502) 436490.99 3773652.58 0.00140 (15100418)
436401.45 3773671.43 0.00499 (15102517) 436409.59 3773671.43 0.00350 (15102517)
436417.73 3773671.43 0.00267 (13012217) 436425.87 3773671.43 0.00232 (14080219)
436434.01 3773671.43 0.00210 (14101121) 436442.15 3773671.43 0.00193 (14101121)
436450.29 3773671.43 0.00180 (14101121) 436458.43 3773671.43 0.00169 (15070605)
436466.57 3773671.43 0.00160 (15070605) 436474.71 3773671.43 0.00152 (12071502)
436482.85 3773671.43 0.00146 (12071502) 436490.99 3773671.43 0.00140 (15100418)
436401.45 3773690.28 0.00500 (15102517) 436409.59 3773690.28 0.00350 (15102517)
436417.73 3773690.28 0.00267 (13012217) 436425.87 3773690.28 0.00233 (14080219)
436434.01 3773690.28 0.00211 (14101121) 436442.15 3773690.28 0.00194 (14101121)
436450.29 3773690.28 0.00181 (14101121) 436458.43 3773690.28 0.00170 (15070605)
436466.57 3773690.28 0.00161 (15070605) 436474.71 3773690.28 0.00153 (12071502)
436482.85 3773690.28 0.00146 (12071502) 436490.99 3773690.28 0.00141 (15100418)
436401.45 3773709.13 0.00500 (15102517) 436409.59 3773709.13 0.00351 (15102517)
436417.73 3773709.13 0.00267 (14080219) 436425.87 3773709.13 0.00235 (14080219)
436434.01 3773709.13 0.00212 (14101121) 436442.15 3773709.13 0.00195 (14101121)
436450.29 3773709.13 0.00181 (14101121) 436458.43 3773709.13 0.00171 (15070605)
436466.57 3773709.13 0.00162 (15070605) 436474.71 3773709.13 0.00154 (12071502)
436482.85 3773709.13 0.00147 (12071502) 436490.99 3773709.13 0.00141 (15100418)
436401.45 3773727.98 0.00501 (15102517) 436409.59 3773727.98 0.00351 (15102517)

```
       436417.73   3773727.98        0.00269  (14080219)               436425.87
 3773727.98        0.00236  (14080219)
       436434.01   3773727.98        0.00213  (14101121)               436442.15
 3773727.98        0.00196  (14101121)
       436450.29   3773727.98        0.00183  (14101121)               436458.43
 3773727.98        0.00172  (15070605)
       436466.57   3773727.98        0.00163  (15070605)               436474.71
 3773727.98        0.00155  (15070605)
       436482.85   3773727.98        0.00148  (12071502)               436490.99
 3773727.98        0.00142  (15100418)
       436401.45   3773746.83        0.00503  (15102517)               436409.59
 3773746.83        0.00352  (15102517)
       436417.73   3773746.83        0.00270  (14080219)               436425.87
 3773746.83        0.00237  (14080219)
       436434.01   3773746.83        0.00214  (14101121)               436442.15
 3773746.83        0.00197  (14101121)
       436450.29   3773746.83        0.00184  (14101121)               436458.43
 3773746.83        0.00173  (15070605)
       436466.57   3773746.83        0.00164  (15070605)               436474.71
 3773746.83        0.00156  (15070605)
       436482.85   3773746.83        0.00149  (12071502)               436490.99
 3773746.83        0.00143  (15100418)
       436401.45   3773765.68        0.00504  (15102517)               436409.59
 3773765.68        0.00353  (15102517)
       436417.73   3773765.68        0.00271  (14080219)               436425.87
 3773765.68        0.00238  (14080219)
       436434.01   3773765.68        0.00216  (14101121)               436442.15
 3773765.68        0.00199  (14101121)
       436450.29   3773765.68        0.00185  (14101121)               436458.43
 3773765.68        0.00174  (15070605)
       436466.57   3773765.68        0.00165  (15070605)               436474.71
 3773765.68        0.00157  (15070605)
```



```
 *** MODELOPTs:    RegDFAULT  CONC  ELEV  URBAN  ADJ_U*

                               *** THE   1ST HIGHEST  1-HR AVERAGE CONCENTRATION
VALUES FOR SOURCE GROUP:  ALL      ***
                                   INCLUDING SOURCE(S):     L0001543    , L0001544
 , L0001545    , L0001546    , L0001547    ,
                 L0001548    , L0001549    , L0001550    , L0001551    , L0001552
 , L0001553    , L0001554    , L0001555    ,
                 L0001556    , L0001557    , L0001558    , L0001559    , L0001560
 , L0001561    , L0001562    , L0001563    ,
```

L0001564 , L0001565 , L0001566 , L0001567 , L0001568 , L0001569 , L0001570 , . . . ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF PM_10 IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)	X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)
436482.85	3773765.68	0.00150	(12071502)	436490.99	3773765.68	0.00144	(15100418)
436401.45	3773784.53	0.00506	(15102517)	436409.59	3773784.53	0.00354	(15102517)
436417.73	3773784.53	0.00273	(14080219)	436425.87	3773784.53	0.00240	(14080219)
436434.01	3773784.53	0.00217	(14101121)	436442.15	3773784.53	0.00200	(14101121)
436450.29	3773784.53	0.00186	(14101121)	436458.43	3773784.53	0.00175	(15070605)
436466.57	3773784.53	0.00166	(15070605)	436474.71	3773784.53	0.00158	(15070605)
436482.85	3773784.53	0.00151	(12071502)	436490.99	3773784.53	0.00145	(15100418)
436401.45	3773803.38	0.00507	(15102517)	436409.59	3773803.38	0.00354	(15102517)
436417.73	3773803.38	0.00274	(14080219)	436425.87	3773803.38	0.00241	(14080219)
436434.01	3773803.38	0.00218	(14101121)	436442.15	3773803.38	0.00201	(14101121)
436450.29	3773803.38	0.00187	(14101121)	436458.43	3773803.38	0.00176	(15070605)
436466.57	3773803.38	0.00167	(15070605)	436474.71	3773803.38	0.00158	(15070605)
436482.85	3773803.38	0.00151	(12071502)	436490.99	3773803.38	0.00145	(15100418)

*** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

*** THE 1ST HIGHEST 8-HR AVERAGE CONCENTRATION

VALUES FOR SOURCE GROUP: ALL *** INCLUDING SOURCE(S): L0001543 , L0001544 , L0001545 , L0001546 , L0001547 , L0001548 , L0001549 , L0001550 , L0001551 , L0001552 , L0001553 , L0001554 , L0001555 , L0001556 , L0001557 , L0001558 , L0001559 , L0001560 , L0001561 , L0001562 , L0001563 , L0001564 , L0001565 , L0001566 , L0001567 , L0001568 , L0001569 , L0001570 , . . . ,

*** NETWORK ID: UCART1 ; NETWORK TYPE: GRIDCART ***

** CONC OF PM_10 IN MICROGRAMS/M**3 **

Y-COORD (METERS)	X-COORD (METERS) 437205.06	437217.73	437230.40	437243.07	437255.74
3774010.2	0.00024 (12120208)	0.00024 (12120208)	0.00023 (12120208)	0.00023 (12120208)	0.00023 (12120208)
3773980.9	0.00024 (12120208)	0.00024 (12120208)	0.00023 (12120208)	0.00023 (12120208)	0.00023 (12120208)
3773951.6	0.00024 (12120208)	0.00024 (12120208)	0.00023 (12120208)	0.00023 (12120208)	0.00023 (12120208)
3773922.3	0.00024 (12120208)	0.00024 (12120208)	0.00023 (12120208)	0.00023 (12120208)	0.00023 (12120208)
3773893.0	0.00024 (12120208)	0.00024 (12120208)	0.00023 (12120208)	0.00023 (12120208)	0.00023 (12120208)
3773863.7	0.00024 (12120208)	0.00024 (12120208)	0.00024 (12120208)	0.00023 (12120208)	0.00023 (12120208)
3773834.4	0.00024 (12120208)	0.00024 (12120208)	0.00024 (12120208)	0.00023 (12120208)	0.00023 (12120208)
3773805.1	0.00024 (12120208)	0.00024 (12120208)	0.00024 (12120208)	0.00023 (12120208)	0.00023 (12120208)
3773775.8	0.00024 (12120208)	0.00024 (12120208)	0.00024 (12120208)	0.00023 (12120208)	0.00023 (12120208)
3773746.5	0.00024 (12120208)	0.00024 (12120208)	0.00024 (12120208)	0.00023 (12120208)	0.00023 (12120208)
3773717.2	0.00024 (12120208)	0.00024 (12120208)	0.00024 (12120208)	0.00023 (12120208)	0.00023 (12120208)
3773687.9	0.00024 (12120208)	0.00024 (12120208)	0.00024 (12120208)	0.00023 (12120208)	0.00023 (12120208)
3773658.6	0.00024 (12120208)	0.00024 (12120208)	0.00024 (12120208)	0.00023 (12120208)	0.00023 (12120208)

 3773629.3 | 0.00024 (12120208)   0.00024 (12120208)   0.00023
(12120208)   0.00023 (12120208)   0.00023 (12120208)
 3773600.0 | 0.00024 (12120208)   0.00024 (12120208)   0.00023
(12120208)   0.00023 (12120208)   0.00023 (12120208)
 3773570.7 | 0.00024 (12120208)   0.00024 (12120208)   0.00023
(12120208)   0.00023 (12120208)   0.00023 (12120208)
 3773541.4 | 0.00024 (12120208)   0.00024 (12120208)   0.00023
(12120208)   0.00023 (12120208)   0.00023 (12120208)
 3773512.1 | 0.00024 (12120208)   0.00024 (12120208)   0.00023
(12120208)   0.00023 (12120208)   0.00023 (12120208)
 3773482.8 | 0.00024 (12120208)   0.00024 (12120208)   0.00023
(12120208)   0.00023 (12120208)   0.00023 (12120208)
 3773453.5 | 0.00024 (12120208)   0.00024 (12120208)   0.00023
(12120208)   0.00023 (12120208)   0.00023 (12120208)
 3773424.2 | 0.00024 (12120208)   0.00024 (12120208)   0.00023
(12120208)   0.00023 (12120208)   0.00023 (12120208)

 *** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

                              *** THE   1ST HIGHEST 8-HR AVERAGE CONCENTRATION
VALUES FOR SOURCE GROUP: ALL   ***
                                 INCLUDING SOURCE(S):   L0001543   , L0001544
 , L0001545   , L0001546   , L0001547   ,
                L0001548   , L0001549   , L0001550   , L0001551   , L0001552
 , L0001553   , L0001554   , L0001555   ,
                L0001556   , L0001557   , L0001558   , L0001559   , L0001560
 , L0001561   , L0001562   , L0001563   ,
                L0001564   , L0001565   , L0001566   , L0001567   , L0001568
 , L0001569   , L0001570   , . . .   ,

                                  *** NETWORK ID: UCART1   ; NETWORK TYPE:
GRIDCART ***

                                     ** CONC OF PM_10   IN MICROGRAMS/M**3
                  **

  Y-COORD | X-COORD (METERS)
  (METERS) | 437268.41   437281.08   437293.75
       437306.42   437319.09
 -
- -

 3774010.2 | 0.00023 (12120208)   0.00022 (12120208)   0.00022

```
(12120208)      0.00022 (12120208)      0.00021 (12120208)
 3773980.9 |      0.00023 (12120208)      0.00022 (12120208)      0.00022
(12120208)      0.00022 (12120208)      0.00022 (12120208)
 3773951.6 |      0.00023 (12120208)      0.00022 (12120208)      0.00022
(12120208)      0.00022 (12120208)      0.00022 (12120208)
 3773922.3 |      0.00023 (12120208)      0.00022 (12120208)      0.00022
(12120208)      0.00022 (12120208)      0.00022 (12120208)
 3773893.0 |      0.00023 (12120208)      0.00022 (12120208)      0.00022
(12120208)      0.00022 (12120208)      0.00022 (12120208)
 3773863.7 |      0.00023 (12120208)      0.00022 (12120208)      0.00022
(12120208)      0.00022 (12120208)      0.00022 (12120208)
 3773834.4 |      0.00023 (12120208)      0.00022 (12120208)      0.00022
(12120208)      0.00022 (12120208)      0.00022 (12120208)
 3773805.1 |      0.00023 (12120208)      0.00022 (12120208)      0.00022
(12120208)      0.00022 (12120208)      0.00022 (12120208)
 3773775.8 |      0.00023 (12120208)      0.00022 (12120208)      0.00022
(12120208)      0.00022 (12120208)      0.00022 (12120208)
 3773746.5 |      0.00023 (12120208)      0.00022 (12120208)      0.00022
(12120208)      0.00022 (12120208)      0.00022 (12120208)
 3773717.2 |      0.00023 (12120208)      0.00022 (12120208)      0.00022
(12120208)      0.00022 (12120208)      0.00022 (12120208)
 3773687.9 |      0.00023 (12120208)      0.00022 (12120208)      0.00022
(12120208)      0.00022 (12120208)      0.00022 (12120208)
 3773658.6 |      0.00023 (12120208)      0.00022 (12120208)      0.00022
(12120208)      0.00022 (12120208)      0.00022 (12120208)
 3773629.3 |      0.00023 (12120208)      0.00022 (12120208)      0.00022
(12120208)      0.00022 (12120208)      0.00022 (12120208)
 3773600.0 |      0.00023 (12120208)      0.00022 (12120208)      0.00022
(12120208)      0.00022 (12120208)      0.00022 (12120208)
 3773570.7 |      0.00023 (12120208)      0.00022 (12120208)      0.00022
(12120208)      0.00022 (12120208)      0.00022 (12120208)
 3773541.4 |      0.00023 (12120208)      0.00022 (12120208)      0.00022
(12120208)      0.00022 (12120208)      0.00022 (12120208)
 3773512.1 |      0.00023 (12120208)      0.00022 (12120208)      0.00022
(12120208)      0.00022 (12120208)      0.00022 (12120208)
 3773482.8 |      0.00023 (12120208)      0.00022 (12120208)      0.00022
(12120208)      0.00022 (12120208)      0.00021 (12120208)
 3773453.5 |      0.00022 (12120208)      0.00022 (12120208)      0.00022
(12120208)      0.00022 (12120208)      0.00021 (12120208)
 3773424.2 |      0.00022 (12120208)      0.00022 (12120208)      0.00022
(12120208)      0.00022 (12120208)      0.00021 (12120208)
 *** AERMOD - VERSION  19191 ***   *** C:\Lakes\AERMOD View\Bridge Upland\Bridge
Upland.isc                ***        01/15/20
 *** AERMET - VERSION  16216 ***   ***
                          ***       13:48:55

                                    PAGE  98
 *** MODELOPTs:    RegDFAULT  CONC  ELEV  URBAN  ADJ_U*
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*** THE 1ST HIGHEST 8-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): L0001543 , L0001544 , L0001545 , L0001546 , L0001547 , L0001548 , L0001549 , L0001550 , L0001551 , L0001552 , L0001553 , L0001554 , L0001555 , L0001556 , L0001557 , L0001558 , L0001559 , L0001560 , L0001561 , L0001562 , L0001563 , L0001564 , L0001565 , L0001566 , L0001567 , L0001568 , L0001569 , L0001570 , . . . ,

*** NETWORK ID: UCART1 ; NETWORK TYPE: GRIDCART ***

** CONC OF PM_10 IN MICROGRAMS/M**3 **

Y-COORD (METERS)	X-COORD (METERS) 437331.76	437344.43	437357.10	437369.77	437382.44
3774010.2	0.00021 (12120208)	0.00021 (12120208)	0.00021 (12120208)	0.00020 (12120208)	0.00020 (12120208)
3773980.9	0.00021 (12120208)	0.00021 (12120208)	0.00021 (12120208)	0.00021 (12120208)	0.00020 (12120208)
3773951.6	0.00021 (12120208)	0.00021 (12120208)	0.00021 (12120208)	0.00021 (12120208)	0.00021 (12120208)
3773922.3	0.00021 (12120208)	0.00021 (12120208)	0.00021 (12120208)	0.00021 (12120208)	0.00021 (12120208)
3773893.0	0.00022 (12120208)	0.00021 (12120208)	0.00021 (12120208)	0.00021 (12120208)	0.00021 (12120208)
3773863.7	0.00022 (12120208)	0.00021 (12120208)	0.00021 (12120208)	0.00021 (12120208)	0.00021 (12120208)
3773834.4	0.00022 (12120208)	0.00021 (12120208)	0.00021 (12120208)	0.00021 (12120208)	0.00021 (12120208)
3773805.1	0.00022 (12120208)	0.00021 (12120208)	0.00021 (12120208)	0.00021 (12120208)	0.00021 (12120208)
3773775.8	0.00022 (12120208)	0.00021 (12120208)	0.00021 (12120208)	0.00021 (12120208)	0.00021 (12120208)
3773746.5	0.00021 (12120208)	0.00021 (12120208)	0.00021 (12120208)	0.00021 (12120208)	0.00021 (12120208)
3773717.2	0.00021 (12120208)	0.00021 (12120208)	0.00021 (12120208)	0.00021 (12120208)	0.00021 (12120208)
3773687.9	0.00021 (12120208)	0.00021 (12120208)	0.00021 (12120208)	0.00021 (12120208)	0.00021 (12120208)

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 3773658.6 |      0.00021 (12120208)      0.00021 (12120208)      0.00021
(12120208)      0.00021 (12120208)      0.00021 (12120208)
 3773629.3 |      0.00021 (12120208)      0.00021 (12120208)      0.00021
(12120208)      0.00021 (12120208)      0.00021 (12120208)
 3773600.0 |      0.00021 (12120208)      0.00021 (12120208)      0.00021
(12120208)      0.00021 (12120208)      0.00020 (12120208)
 3773570.7 |      0.00021 (12120208)      0.00021 (12120208)      0.00021
(12120208)      0.00021 (12120208)      0.00020 (12120208)
 3773541.4 |      0.00021 (12120208)      0.00021 (12120208)      0.00021
(12120208)      0.00021 (12120208)      0.00020 (12120208)
 3773512.1 |      0.00021 (12120208)      0.00021 (12120208)      0.00021
(12120208)      0.00021 (12120208)      0.00020 (12120208)
 3773482.8 |      0.00021 (12120208)      0.00021 (12120208)      0.00021
(12120208)      0.00020 (12120208)      0.00020 (12120208)
 3773453.5 |      0.00021 (12120208)      0.00021 (12120208)      0.00021
(12120208)      0.00020 (12120208)      0.00020 (12120208)
 3773424.2 |      0.00021 (12120208)      0.00021 (12120208)      0.00021
(12120208)      0.00020 (12120208)      0.00020 (12120208)
```



```
 *** MODELOPTs:    RegDFAULT  CONC  ELEV  URBAN  ADJ_U*

                               *** THE   1ST HIGHEST  8-HR AVERAGE CONCENTRATION
VALUES FOR SOURCE GROUP:  ALL      ***
                                  INCLUDING SOURCE(S):     L0001543    , L0001544
 , L0001545    , L0001546    , L0001547    ,
                 L0001548    , L0001549    , L0001550    , L0001551    , L0001552
 , L0001553    , L0001554    , L0001555    ,
                 L0001556    , L0001557    , L0001558    , L0001559    , L0001560
 , L0001561    , L0001562    , L0001563    ,
                 L0001564    , L0001565    , L0001566    , L0001567    , L0001568
 , L0001569    , L0001570    ,  . . .      ,

                                  *** NETWORK ID: UCART1   ;  NETWORK TYPE:
GRIDCART ***

                                       ** CONC OF PM_10    IN MICROGRAMS/M**3
                    **

  Y-COORD  |                                                  X-COORD (METERS)
  (METERS) |       437395.11              437407.78              437420.45
       437433.12              437445.79
 - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
- - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
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 3774010.2 |      0.00020 (12120208)      0.00020 (12120208)      0.00020
(12120208)      0.00019 (12120208)      0.00019 (12120208)
 3773980.9 |      0.00020 (12120208)      0.00020 (12120208)      0.00020
(12120208)      0.00020 (12120208)      0.00019 (12120208)
 3773951.6 |      0.00020 (12120208)      0.00020 (12120208)      0.00020
(12120208)      0.00020 (12120208)      0.00020 (12120208)
 3773922.3 |      0.00020 (12120208)      0.00020 (12120208)      0.00020
(12120208)      0.00020 (12120208)      0.00020 (12120208)
 3773893.0 |      0.00020 (12120208)      0.00020 (12120208)      0.00020
(12120208)      0.00020 (12120208)      0.00020 (12120208)
 3773863.7 |      0.00020 (12120208)      0.00020 (12120208)      0.00020
(12120208)      0.00020 (12120208)      0.00020 (12120208)
 3773834.4 |      0.00020 (12120208)      0.00020 (12120208)      0.00020
(12120208)      0.00020 (12120208)      0.00020 (12120208)
 3773805.1 |      0.00020 (12120208)      0.00020 (12120208)      0.00020
(12120208)      0.00020 (12120208)      0.00020 (12120208)
 3773775.8 |      0.00020 (12120208)      0.00020 (12120208)      0.00020
(12120208)      0.00020 (12120208)      0.00019 (12120208)
 3773746.5 |      0.00020 (12120208)      0.00020 (12120208)      0.00020
(12120208)      0.00020 (12120208)      0.00019 (12120208)
 3773717.2 |      0.00020 (12120208)      0.00020 (12120208)      0.00020
(12120208)      0.00020 (12120208)      0.00019 (12120208)
 3773687.9 |      0.00020 (12120208)      0.00020 (12120208)      0.00020
(12120208)      0.00020 (12120208)      0.00019 (12120208)
 3773658.6 |      0.00020 (12120208)      0.00020 (12120208)      0.00020
(12120208)      0.00020 (12120208)      0.00019 (12120208)
 3773629.3 |      0.00020 (12120208)      0.00020 (12120208)      0.00020
(12120208)      0.00020 (12120208)      0.00019 (12120208)
 3773600.0 |      0.00020 (12120208)      0.00020 (12120208)      0.00020
(12120208)      0.00020 (12120208)      0.00019 (12120208)
 3773570.7 |      0.00020 (12120208)      0.00020 (12120208)      0.00020
(12120208)      0.00020 (12120208)      0.00019 (12120208)
 3773541.4 |      0.00020 (12120208)      0.00020 (12120208)      0.00020
(12120208)      0.00019 (12120208)      0.00019 (12120208)
 3773512.1 |      0.00020 (12120208)      0.00020 (12120208)      0.00020
(12120208)      0.00019 (12120208)      0.00019 (12120208)
 3773482.8 |      0.00020 (12120208)      0.00020 (12120208)      0.00020
(12120208)      0.00019 (12120208)      0.00019 (12120208)
 3773453.5 |      0.00020 (12120208)      0.00020 (12120208)      0.00019
(12120208)      0.00019 (12120208)      0.00019 (12120208)
 3773424.2 |      0.00020 (12120208)      0.00020 (12120208)      0.00019
(12120208)      0.00019 (12120208)      0.00019 (12120208)
 *** AERMOD - VERSION  19191 ***   *** C:\Lakes\AERMOD View\Bridge Upland\Bridge
Upland.isc                 ***        01/15/20
 *** AERMET - VERSION  16216 ***   ***
                       ***        13:48:55
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*** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

*** THE 1ST HIGHEST 8-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): L0001543 , L0001544 , L0001545 , L0001546 , L0001547 ,
L0001548 , L0001549 , L0001550 , L0001551 , L0001552 , L0001553 , L0001554 , L0001555 ,
L0001556 , L0001557 , L0001558 , L0001559 , L0001560 , L0001561 , L0001562 , L0001563 ,
L0001564 , L0001565 , L0001566 , L0001567 , L0001568 , L0001569 , L0001570 , . . . ,

*** NETWORK ID: UCART1 ; NETWORK TYPE: GRIDCART ***

** CONC OF PM_10 IN MICROGRAMS/M**3 **

Y-COORD (METERS)	X-COORD (METERS) 437458.46
3774010.2	0.00019 (12120208)
3773980.9	0.00019 (12120208)
3773951.6	0.00019 (12120208)
3773922.3	0.00019 (12120208)
3773893.0	0.00019 (12120208)
3773863.7	0.00019 (12120208)
3773834.4	0.00019 (12120208)
3773805.1	0.00019 (12120208)
3773775.8	0.00019 (12120208)
3773746.5	0.00019 (12120208)
3773717.2	0.00019 (12120208)
3773687.9	0.00019 (12120208)
3773658.6	0.00019 (12120208)
3773629.3	0.00019 (12120208)
3773600.0	0.00019 (12120208)
3773570.7	0.00019 (12120208)
3773541.4	0.00019 (12120208)
3773512.1	0.00019 (12120208)
3773482.8	0.00019 (12120208)
3773453.5	0.00019 (12120208)
3773424.2	0.00019 (12120208)

*** THE   1ST HIGHEST 8-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL   ***
INCLUDING SOURCE(S):   L0001543   , L0001544 , L0001545   , L0001546   , L0001547   ,
L0001548   , L0001549   , L0001550   , L0001551   , L0001552 , L0001553   , L0001554   , L0001555   ,
L0001556   , L0001557   , L0001558   , L0001559   , L0001560 , L0001561   , L0001562   , L0001563   ,
L0001564   , L0001565   , L0001566   , L0001567   , L0001568 , L0001569   , L0001570   , . . .   ,

*** NETWORK ID: UCART2   ; NETWORK TYPE: GRIDCART ***

** CONC OF PM_10   IN MICROGRAMS/M**3
**

Y-COORD (METERS)	X-COORD (METERS)				
	437338.99	437349.41	437359.83	437370.25	437380.67
3774609.5	0.00020 (12120208)	0.00020 (12120208)	0.00020 (12120208)	0.00019 (12120208)	0.00019 (12120208)
3774590.8	0.00020 (12120208)	0.00020 (12120208)	0.00019 (12120208)	0.00019 (12120208)	0.00019 (12120208)
3774572.0	0.00020 (12120208)	0.00020 (12120208)	0.00019 (12120208)	0.00019 (12120208)	0.00019 (12120208)
3774553.2	0.00020 (12120208)	0.00020 (12120208)	0.00019 (12120208)	0.00019 (12120208)	0.00019 (12120208)
3774534.4	0.00020 (12120208)	0.00020 (12120208)	0.00019 (12120208)	0.00019 (12120208)	0.00019 (12120208)
3774515.7	0.00020 (12120208)	0.00020 (12120208)	0.00019 (12120208)	0.00019 (12120208)	0.00019 (12120208)
3774496.9	0.00020 (12120208)	0.00020 (12120208)	0.00019 (12120208)	0.00019 (12120208)	0.00020 (12120208)
3774478.1	0.00020 (12120208)	0.00020 (12120208)	0.00019 (12120208)	0.00019 (12120208)	0.00020 (12120208)
3774459.4	0.00020 (12120208)	0.00020 (12120208)	0.00019 (12120208)	0.00019 (12120208)	0.00020 (12120208)
3774440.6	0.00020 (12120208)	0.00020 (12120208)			

```
(12120208)      0.00020 (12120208)      0.00019 (12120208)
 3774421.8 |      0.00020 (12120208)      0.00020 (12120208)      0.00020
(12120208)      0.00020 (12120208)      0.00019 (12120208)
 3774403.1 |      0.00020 (12120208)      0.00020 (12120208)      0.00020
(12120208)      0.00020 (12120208)      0.00020 (12120208)
 3774384.3 |      0.00020 (12120208)      0.00020 (12120208)      0.00020
(12120208)      0.00020 (12120208)      0.00020 (12120208)
 3774365.5 |      0.00020 (12120208)      0.00020 (12120208)      0.00020
(12120208)      0.00020 (12120208)      0.00020 (12120208)
 3774346.7 |      0.00020 (12120208)      0.00020 (12120208)      0.00020
(12120208)      0.00020 (12120208)      0.00020 (12120208)
 3774328.0 |      0.00020 (12120208)      0.00020 (12120208)      0.00020
(12120208)      0.00020 (12120208)      0.00020 (12120208)
 3774309.2 |      0.00021 (12120208)      0.00020 (12120208)      0.00020
(12120208)      0.00020 (12120208)      0.00020 (12120208)
 3774290.4 |      0.00021 (12120208)      0.00020 (12120208)      0.00020
(12120208)      0.00020 (12120208)      0.00020 (12120208)
 3774271.7 |      0.00021 (12120208)      0.00021 (12120208)      0.00020
(12120208)      0.00020 (12120208)      0.00020 (12120208)
 3774252.9 |      0.00021 (12120208)      0.00021 (12120208)      0.00020
(12120208)      0.00020 (12120208)      0.00020 (12120208)
 3774234.1 |      0.00021 (12120208)      0.00021 (12120208)      0.00020
(12120208)      0.00020 (12120208)      0.00020 (12120208)
 *** AERMOD - VERSION  19191 ***   *** C:\Lakes\AERMOD View\Bridge Upland\Bridge
Upland.isc                ***        01/15/20
 *** AERMET - VERSION  16216 ***   ***
                          ***        13:48:55

                                     PAGE 102
 *** MODELOPTs:    RegDFAULT  CONC  ELEV  URBAN  ADJ_U*

                                *** THE   1ST HIGHEST  8-HR AVERAGE CONCENTRATION
VALUES FOR SOURCE GROUP:  ALL      ***
                                    INCLUDING SOURCE(S):     L0001543    , L0001544
 , L0001545    , L0001546    , L0001547    ,
                 L0001548    , L0001549    , L0001550    , L0001551    , L0001552
 , L0001553    , L0001554    , L0001555    ,
                 L0001556    , L0001557    , L0001558    , L0001559    , L0001560
 , L0001561    , L0001562    , L0001563    ,
                 L0001564    , L0001565    , L0001566    , L0001567    , L0001568
 , L0001569    , L0001570    ,  . . .      ,

                                    *** NETWORK ID: UCART2   ;  NETWORK TYPE:
GRIDCART ***

                                         ** CONC OF PM_10    IN MICROGRAMS/M**3
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```

Y-COORD (METERS)	X-COORD (METERS)				
	437391.09	437401.51	437411.93	437422.35	437432.77
3774609.5	0.00019 (12120208)	0.00019 (12120208)	0.00019 (12120208)	0.00019 (12120208)	0.00018 (12120208)
3774590.8	0.00019 (12120208)	0.00019 (12120208)	0.00019 (12120208)	0.00018 (12120208)	0.00018 (12120208)
3774572.0	0.00019 (12120208)	0.00019 (12120208)	0.00019 (12120208)	0.00018 (12120208)	0.00018 (12120208)
3774553.2	0.00019 (12120208)	0.00019 (12120208)	0.00019 (12120208)	0.00018 (12120208)	0.00018 (12120208)
3774534.4	0.00019 (12120208)	0.00019 (12120208)	0.00019 (12120208)	0.00019 (12120208)	0.00018 (12120208)
3774515.7	0.00019 (12120208)	0.00019 (12120208)	0.00019 (12120208)	0.00019 (12120208)	0.00018 (12120208)
3774496.9	0.00019 (12120208)	0.00019 (12120208)	0.00019 (12120208)	0.00019 (12120208)	0.00018 (12120208)
3774478.1	0.00019 (12120208)	0.00019 (12120208)	0.00019 (12120208)	0.00019 (12120208)	0.00019 (12120208)
3774459.4	0.00019 (12120208)	0.00019 (12120208)	0.00019 (12120208)	0.00019 (12120208)	0.00019 (12120208)
3774440.6	0.00019 (12120208)	0.00019 (12120208)	0.00019 (12120208)	0.00019 (12120208)	0.00019 (12120208)
3774421.8	0.00019 (12120208)	0.00019 (12120208)	0.00019 (12120208)	0.00019 (12120208)	0.00019 (12120208)
3774403.1	0.00019 (12120208)	0.00019 (12120208)	0.00019 (12120208)	0.00019 (12120208)	0.00019 (12120208)
3774384.3	0.00019 (12120208)	0.00019 (12120208)	0.00019 (12120208)	0.00019 (12120208)	0.00019 (12120208)
3774365.5	0.00019 (12120208)	0.00019 (12120208)	0.00019 (12120208)	0.00019 (12120208)	0.00019 (12120208)
3774346.7	0.00020 (12120208)	0.00019 (12120208)	0.00019 (12120208)	0.00019 (12120208)	0.00019 (12120208)
3774328.0	0.00020 (12120208)	0.00019 (12120208)	0.00019 (12120208)	0.00019 (12120208)	0.00019 (12120208)
3774309.2	0.00020 (12120208)	0.00019 (12120208)	0.00019 (12120208)	0.00019 (12120208)	0.00019 (12120208)
3774290.4	0.00020 (12120208)	0.00020 (12120208)	0.00019 (12120208)	0.00019 (12120208)	0.00019 (12120208)
3774271.7	0.00020 (12120208)	0.00020 (12120208)	0.00019 (12120208)	0.00019 (12120208)	0.00019 (12120208)
3774252.9	0.00020 (12120208)	0.00020 (12120208)	0.00019 (12120208)	0.00019 (12120208)	0.00019 (12120208)
3774234.1	0.00020 (12120208)	0.00020 (12120208)	0.00020 (12120208)	0.00019 (12120208)	0.00019 (12120208)

*** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

*** THE 1ST HIGHEST 8-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): L0001543 , L0001544 , L0001545 , L0001546 , L0001547 ,
L0001548 , L0001549 , L0001550 , L0001551 , L0001552 , L0001553 , L0001554 , L0001555 ,
L0001556 , L0001557 , L0001558 , L0001559 , L0001560 , L0001561 , L0001562 , L0001563 ,
L0001564 , L0001565 , L0001566 , L0001567 , L0001568 , L0001569 , L0001570 , . . . ,

*** NETWORK ID: UCART2 ; NETWORK TYPE: GRIDCART ***

** CONC OF PM_10 IN MICROGRAMS/M**3 **

Y-COORD (METERS)	X-COORD (METERS)				
	437443.19	437453.61	437464.03	437474.45	437484.87
3774609.5	0.00018 (12120208)	0.00018 (12120208)	0.00018 (12120208)	0.00018 (12120208)	0.00018 (12120208)
3774590.8	0.00018 (12120208)	0.00018 (12120208)	0.00018 (12120208)	0.00018 (12120208)	0.00018 (12120208)
3774572.0	0.00018 (12120208)	0.00018 (12120208)	0.00018 (12120208)	0.00018 (12120208)	0.00018 (12120208)
3774553.2	0.00018 (12120208)	0.00018 (12120208)	0.00018 (12120208)	0.00018 (12120208)	0.00018 (12120208)
3774534.4	0.00018 (12120208)	0.00018 (12120208)	0.00018 (12120208)	0.00018 (12120208)	0.00018 (12120208)
3774515.7	0.00018 (12120208)	0.00018 (12120208)	0.00018 (12120208)	0.00018 (12120208)	0.00018 (12120208)
3774496.9	0.00018 (12120208)	0.00018 (12120208)	0.00018 (12120208)	0.00018 (12120208)	0.00018 (12120208)
3774478.1	0.00018 (12120208)	0.00018 (12120208)	0.00018 (12120208)	0.00018 (12120208)	0.00018 (12120208)
3774459.4	0.00018 (12120208)	0.00018 (12120208)	0.00018 (12120208)		

(12120208) 0.00018 (12120208) 0.00018 (12120208)
 3774440.6 | 0.00018 (12120208) 0.00018 (12120208) 0.00018
(12120208) 0.00018 (12120208) 0.00018 (12120208)
 3774421.8 | 0.00019 (12120208) 0.00018 (12120208) 0.00018
(12120208) 0.00018 (12120208) 0.00018 (12120208)
 3774403.1 | 0.00019 (12120208) 0.00018 (12120208) 0.00018
(12120208) 0.00018 (12120208) 0.00018 (12120208)
 3774384.3 | 0.00019 (12120208) 0.00019 (12120208) 0.00018
(12120208) 0.00018 (12120208) 0.00018 (12120208)
 3774365.5 | 0.00019 (12120208) 0.00019 (12120208) 0.00018
(12120208) 0.00018 (12120208) 0.00018 (12120208)
 3774346.7 | 0.00019 (12120208) 0.00019 (12120208) 0.00019
(12120208) 0.00018 (12120208) 0.00018 (12120208)
 3774328.0 | 0.00019 (12120208) 0.00019 (12120208) 0.00019
(12120208) 0.00018 (12120208) 0.00018 (12120208)
 3774309.2 | 0.00019 (12120208) 0.00019 (12120208) 0.00019
(12120208) 0.00018 (12120208) 0.00018 (12120208)
 3774290.4 | 0.00019 (12120208) 0.00019 (12120208) 0.00019
(12120208) 0.00018 (12120208) 0.00018 (12120208)
 3774271.7 | 0.00019 (12120208) 0.00019 (12120208) 0.00019
(12120208) 0.00019 (12120208) 0.00018 (12120208)
 3774252.9 | 0.00019 (12120208) 0.00019 (12120208) 0.00019
(12120208) 0.00019 (12120208) 0.00018 (12120208)
 3774234.1 | 0.00019 (12120208) 0.00019 (12120208) 0.00019
(12120208) 0.00019 (12120208) 0.00018 (12120208)

 *** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

*** THE 1ST HIGHEST 8-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): L0001543 , L0001544 , L0001545 , L0001546 , L0001547 ,
L0001548 , L0001549 , L0001550 , L0001551 , L0001552 , L0001553 , L0001554 , L0001555 ,
L0001556 , L0001557 , L0001558 , L0001559 , L0001560 , L0001561 , L0001562 , L0001563 ,
L0001564 , L0001565 , L0001566 , L0001567 , L0001568 , L0001569 , L0001570 , . . . ,

*** NETWORK ID: UCART2 ; NETWORK TYPE: GRIDCART ***

** CONC OF PM_10 IN MICROGRAMS/M**3

**

Y-COORD (METERS)	X-COORD (METERS)				
	437495.29	437505.71	437516.13	437526.55	437536.97
3774609.5	0.00017 (12120208)	0.00017 (12120208)	0.00017 (12120208)	0.00017 (12120208)	0.00017 (12120208)
3774590.8	0.00017 (12120208)	0.00017 (12120208)	0.00017 (12120208)	0.00017 (12120208)	0.00017 (12120208)
3774572.0	0.00017 (12120208)	0.00017 (12120208)	0.00017 (12120208)	0.00017 (12120208)	0.00017 (12120208)
3774553.2	0.00017 (12120208)	0.00017 (12120208)	0.00017 (12120208)	0.00017 (12120208)	0.00017 (12120208)
3774534.4	0.00018 (12120208)	0.00017 (12120208)	0.00017 (12120208)	0.00017 (12120208)	0.00017 (12120208)
3774515.7	0.00018 (12120208)	0.00017 (12120208)	0.00017 (12120208)	0.00017 (12120208)	0.00017 (12120208)
3774496.9	0.00018 (12120208)	0.00017 (12120208)	0.00017 (12120208)	0.00017 (12120208)	0.00017 (12120208)
3774478.1	0.00018 (12120208)	0.00018 (12120208)	0.00017 (12120208)	0.00017 (12120208)	0.00017 (12120208)
3774459.4	0.00018 (12120208)	0.00018 (12120208)	0.00017 (12120208)	0.00017 (12120208)	0.00017 (12120208)
3774440.6	0.00018 (12120208)	0.00018 (12120208)	0.00017 (12120208)	0.00017 (12120208)	0.00018 (12120208)
3774421.8	0.00018 (12120208)	0.00018 (12120208)	0.00017 (12120208)	0.00017 (12120208)	0.00018 (12120208)
3774403.1	0.00018 (12120208)	0.00018 (12120208)	0.00017 (12120208)	0.00018 (12120208)	0.00018 (12120208)
3774384.3	0.00018 (12120208)	0.00018 (12120208)	0.00017 (12120208)	0.00018 (12120208)	0.00018 (12120208)
3774365.5	0.00018 (12120208)	0.00018 (12120208)	0.00017 (12120208)	0.00018 (12120208)	0.00018 (12120208)
3774346.7	0.00018 (12120208)	0.00018 (12120208)	0.00017 (12120208)	0.00018 (12120208)	0.00018 (12120208)
3774328.0	0.00018 (12120208)	0.00018 (12120208)	0.00018 (12120208)	0.00018 (12120208)	0.00018 (12120208)
3774309.2	0.00018 (12120208)	0.00018 (12120208)	0.00018 (12120208)	0.00018 (12120208)	0.00018 (12120208)
3774290.4	0.00018 (12120208)	0.00018 (12120208)	0.00018 (12120208)	0.00018 (12120208)	0.00018 (12120208)
3774271.7	0.00018 (12120208)	0.00018 (12120208)	0.00018 (12120208)	0.00018 (12120208)	0.00018 (12120208)
3774252.9	0.00018 (12120208)	0.00018 (12120208)	0.00018 (12120208)	0.00018 (12120208)	0.00018 (12120208)

 3774234.1 | 0.00018 (12120208)   0.00018 (12120208)   0.00018 (12120208)   0.00018 (12120208)   0.00018 (12120208)
↑ *** AERMOD - VERSION 19191 ***   *** C:\Lakes\AERMOD View\Bridge Upland\Bridge Upland.isc   ***   01/15/20
 *** AERMET - VERSION 16216 ***   ***   ***   13:48:55

 *** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

                              *** THE   1ST HIGHEST 8-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL   ***
                                  INCLUDING SOURCE(S):   L0001543   , L0001544
 , L0001545   , L0001546   , L0001547   ,
                 L0001548   , L0001549   , L0001550   , L0001551   , L0001552
 , L0001553   , L0001554   , L0001555   ,
                 L0001556   , L0001557   , L0001558   , L0001559   , L0001560
 , L0001561   , L0001562   , L0001563   ,
                 L0001564   , L0001565   , L0001566   , L0001567   , L0001568
 , L0001569   , L0001570   , . . .   ,

                                  *** NETWORK ID: UCART2   ; NETWORK TYPE: GRIDCART ***

                                       ** CONC OF PM_10   IN MICROGRAMS/M**3
                    **

  Y-COORD | X-COORD (METERS)
  (METERS) | 437547.39
 - - -

 3774309.2 | 0.00017 (12120208)
 3774290.4 | 0.00017 (12120208)
 3774271.7 | 0.00018 (12120208)
 3774252.9 | 0.00018 (12120208)
 3774234.1 | 0.00018 (12120208)

 *** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

                              *** THE   1ST HIGHEST 8-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL   ***
                                  INCLUDING SOURCE(S):   L0001543   , L0001544
 , L0001545   , L0001546   , L0001547   ,
                 L0001548   , L0001549   , L0001550   , L0001551   , L0001552
 , L0001553   , L0001554   , L0001555   ,
                 L0001556   , L0001557   , L0001558   , L0001559   , L0001560
 , L0001561   , L0001562   , L0001563   ,
                 L0001564   , L0001565   , L0001566   , L0001567   , L0001568
 , L0001569   , L0001570   , . . .   ,

                                               *** DISCRETE CARTESIAN RECEPTOR POINTS ***

                                          ** CONC OF PM_10   IN MICROGRAMS/M**3
                    **

      X-COORD (M) Y-COORD (M)   CONC   (YYMMDDHH)   X-COORD (M) Y-COORD (M)   CONC   (YYMMDDHH)
 -
        436490.76   3772888.65   0.00089 (16121108)   436520.76   3772888.65   0.00073 (16121108)
        436550.76   3772888.65   0.00062 (16121108)   436610.76   3772888.65   0.00050 (16010708)
        436640.76   3772888.65   0.00046 (16010708)   436670.76   3772888.65   0.00042 (16010708)
        436700.76   3772888.65   0.00040 (12120208)   436490.76   3772918.65   0.00089 (16121108)
        436520.76   3772918.65   0.00073 (16121108)   436550.76   3772918.65   0.00062 (16121108)
        436610.76   3772918.65   0.00051 (16010708)   436640.76   3772918.65   0.00046 (16010708)
        436670.76   3772918.65   0.00043 (16010708)   436700.76   3772918.65   0.00039 (16010708)

436610.76 3772948.65 0.00051 (16010708) 436640.76 3772948.65 0.00047 (16010708)
436670.76 3772948.65 0.00043 (16010708) 436700.76 3772948.65 0.00040 (16010708)
436550.76 3772978.65 0.00063 (16010708) 436580.76 3772978.65 0.00057 (16010708)
436610.76 3772978.65 0.00052 (16010708) 436640.76 3772978.65 0.00047 (16010708)
436670.76 3772978.65 0.00043 (16010708) 436700.76 3772978.65 0.00040 (16010708)
436550.76 3773008.65 0.00063 (16010708) 436580.76 3773008.65 0.00057 (16010708)
436610.76 3773008.65 0.00052 (16010708) 436640.76 3773008.65 0.00048 (16010708)
436670.76 3773008.65 0.00044 (16010708) 436700.76 3773008.65 0.00040 (16010708)
436610.76 3773038.65 0.00052 (16010708) 436640.76 3773038.65 0.00048 (16010708)
436670.76 3773038.65 0.00044 (16010708) 436700.76 3773038.65 0.00041 (16010708)
436610.76 3773068.65 0.00052 (16010708) 436640.76 3773068.65 0.00048 (16010708)
436670.76 3773068.65 0.00044 (16010708) 436700.76 3773068.65 0.00041 (16010708)
436100.76 3773098.65 0.00040 (16121108) 436130.76 3773098.65 0.00044 (16121108)
436160.76 3773098.65 0.00049 (16121108) 436190.76 3773098.65 0.00055 (16121108)
436220.76 3773098.65 0.00064 (16121108) 436610.76 3773098.65 0.00053 (16010708)
436640.76 3773098.65 0.00048 (16010708) 436670.76 3773098.65 0.00045 (16010708)
436700.76 3773098.65 0.00041 (16010708) 436100.76 3773128.65 0.00040 (16121108)
436130.76 3773128.65 0.00044 (16121108) 436160.76 3773128.65 0.00049 (16121108)
436190.76 3773128.65 0.00055 (16121108) 436220.76 3773128.65 0.00064 (16121108)
436250.76 3773128.65 0.00075 (16121108) 436100.76 3773158.65 0.00040 (16121108)
436130.76 3773158.65 0.00044 (16121108) 436160.76 3773158.65 0.00049 (16121108)
436190.76 3773158.65 0.00055 (16121108) 436220.76 3773158.65 0.00064 (16121108)
436250.76 3773158.65 0.00075 (16121108) 436520.76 3773158.65 0.00075 (16121108)
436550.76 3773158.65 0.00064 (16010708) 436580.76 3773158.65 0.00058 (16010708)

```
       436610.76   3773158.65        0.00053  (16010708)               436640.76
 3773158.65        0.00049  (16010708)
       436670.76   3773158.65        0.00045  (16010708)               436100.76
 3773188.65        0.00040  (16121108)
       436130.76   3773188.65        0.00044  (16121108)               436160.76
 3773188.65        0.00049  (16121108)
       436190.76   3773188.65        0.00056  (16121108)               436220.76
 3773188.65        0.00064  (16121108)
       436250.76   3773188.65        0.00075  (16121108)               436400.76
 3773188.65        0.00389  (16121108)
       436430.76   3773188.65        0.00175  (16121108)               436460.76
 3773188.65        0.00118  (16121108)
       436490.76   3773188.65        0.00091  (16121108)               436520.76
 3773188.65        0.00075  (16121108)
       436550.76   3773188.65        0.00065  (16010708)               436580.76
 3773188.65        0.00058  (16010708)
       436610.76   3773188.65        0.00053  (16010708)               436640.76
 3773188.65        0.00049  (16010708)
```



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 *** MODELOPTs:    RegDFAULT  CONC  ELEV  URBAN  ADJ_U*

                              *** THE   1ST HIGHEST  8-HR AVERAGE CONCENTRATION
VALUES FOR SOURCE GROUP:  ALL      ***
                                 INCLUDING SOURCE(S):     L0001543    , L0001544
 , L0001545    , L0001546    , L0001547    ,
                  L0001548    , L0001549    , L0001550    , L0001551    , L0001552
 , L0001553    , L0001554    , L0001555    ,
                  L0001556    , L0001557    , L0001558    , L0001559    , L0001560
 , L0001561    , L0001562    , L0001563    ,
                  L0001564    , L0001565    , L0001566    , L0001567    , L0001568
 , L0001569    , L0001570    ,  . . .      ,

                                               *** DISCRETE CARTESIAN RECEPTOR POINTS
***

                                            ** CONC OF PM_10    IN MICROGRAMS/M**3
                    **

      X-COORD (M)  Y-COORD (M)        CONC     (YYMMDDHH)              X-COORD (M)
Y-COORD (M)        CONC     (YYMMDDHH)
 - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
- - - - - - - - - - - - - - - - - - - - - - - - - - -
        436670.76   3773188.65        0.00046  (16010708)               436100.76
```

```
3773218.65        0.00040  (16121108)
       436130.76   3773218.65        0.00044  (16121108)                436160.76
3773218.65        0.00049  (16121108)
       436190.76   3773218.65        0.00056  (16121108)                436220.76
3773218.65        0.00064  (16121108)
       436250.76   3773218.65        0.00075  (16121108)                436280.76
3773218.65        0.00091  (16121108)
       436310.76   3773218.65        0.00119  (16121108)                436340.76
3773218.65        0.00175  (16121108)
       436370.76   3773218.65        0.00390  (16121108)                436400.76
3773218.65        0.00391  (16121108)
       436430.76   3773218.65        0.00175  (16121108)                436460.76
3773218.65        0.00119  (16121108)
       436490.76   3773218.65        0.00091  (16121108)                436520.76
3773218.65        0.00075  (16121108)
       436550.76   3773218.65        0.00065  (16010708)                436580.76
3773218.65        0.00059  (16010708)
       436610.76   3773218.65        0.00054  (16010708)                436640.76
3773218.65        0.00050  (16010708)
       436670.76   3773218.65        0.00046  (16010708)                436100.76
3773248.65        0.00040  (16121108)
       436130.76   3773248.65        0.00044  (16121108)                436160.76
3773248.65        0.00049  (16121108)
       436190.76   3773248.65        0.00056  (16121108)                436220.76
3773248.65        0.00064  (16121108)
       436250.76   3773248.65        0.00075  (16121108)                436280.76
3773248.65        0.00091  (16121108)
       436310.76   3773248.65        0.00118  (16121108)                436340.76
3773248.65        0.00175  (16121108)
       436370.76   3773248.65        0.00388  (16121108)                436400.76
3773248.65        0.00393  (16121108)
       436430.76   3773248.65        0.00176  (16121108)                436460.76
3773248.65        0.00119  (16121108)
       436490.76   3773248.65        0.00091  (16121108)                436520.76
3773248.65        0.00075  (16121108)
       436550.76   3773248.65        0.00065  (16010708)                436580.76
3773248.65        0.00059  (16010708)
       436610.76   3773248.65        0.00054  (16010708)                436640.76
3773248.65        0.00050  (16010708)
       436670.76   3773248.65        0.00046  (16010708)                436100.76
3773278.65        0.00040  (16121108)
       436130.76   3773278.65        0.00044  (16121108)                436160.76
3773278.65        0.00049  (16121108)
       436190.76   3773278.65        0.00056  (16121108)                436220.76
3773278.65        0.00064  (16121108)
       436250.76   3773278.65        0.00075  (16121108)                436280.76
3773278.65        0.00091  (16121108)
       436310.76   3773278.65        0.00118  (16121108)                436340.76
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 3773278.65        0.00174  (16121108)
       436370.76   3773278.65        0.00385  (16121108)               436400.76
 3773278.65        0.00396  (16121108)
       436430.76   3773278.65        0.00176  (16121108)               436460.76
 3773278.65        0.00119  (16121108)
       436490.76   3773278.65        0.00092  (16121108)               436520.76
 3773278.65        0.00075  (16121108)
       436550.76   3773278.65        0.00066  (16010708)               436580.76
 3773278.65        0.00059  (16010708)
       436610.76   3773278.65        0.00054  (16010708)               436640.76
 3773278.65        0.00050  (16010708)
       436670.76   3773278.65        0.00046  (16010708)               436100.76
 3773308.65        0.00040  (16121108)
       436130.76   3773308.65        0.00044  (16121108)               436160.76
 3773308.65        0.00049  (16121108)
       436190.76   3773308.65        0.00056  (16121108)               436220.76
 3773308.65        0.00064  (16121108)
       436250.76   3773308.65        0.00075  (16121108)               436280.76
 3773308.65        0.00091  (16121108)
       436310.76   3773308.65        0.00118  (16121108)               436340.76
 3773308.65        0.00174  (16121108)
       436370.76   3773308.65        0.00383  (16121108)               436400.76
 3773308.65        0.00398  (16121108)
       436430.76   3773308.65        0.00176  (16121108)               436460.76
 3773308.65        0.00119  (16121108)
       436490.76   3773308.65        0.00092  (16121108)               436520.76
 3773308.65        0.00075  (16121108)
       436550.76   3773308.65        0.00066  (16010708)               436580.76
 3773308.65        0.00060  (16010708)
       436610.76   3773308.65        0.00054  (16010708)               436640.76
 3773308.65        0.00050  (16010708)
```



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 *** MODELOPTs:    RegDFAULT  CONC  ELEV  URBAN  ADJ_U*

                              *** THE   1ST HIGHEST  8-HR AVERAGE CONCENTRATION
VALUES FOR SOURCE GROUP:  ALL      ***
                                  INCLUDING SOURCE(S):     L0001543    , L0001544
 , L0001545    , L0001546    , L0001547    ,
                 L0001548    , L0001549    , L0001550    , L0001551    , L0001552
 , L0001553    , L0001554    , L0001555    ,
                 L0001556    , L0001557    , L0001558    , L0001559    , L0001560
 , L0001561    , L0001562    , L0001563    ,
                 L0001564    , L0001565    , L0001566    , L0001567    , L0001568
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, L0001569 , L0001570 , . . . ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF PM_10 IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)	X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)
436670.76	3773308.65	0.00047	(16010708)	436100.76	3773338.65	0.00040	(16121108)
436130.76	3773338.65	0.00044	(16121108)	436160.76	3773338.65	0.00049	(16121108)
436190.76	3773338.65	0.00056	(16121108)	436220.76	3773338.65	0.00064	(16121108)
436250.76	3773338.65	0.00075	(16121108)	436280.76	3773338.65	0.00091	(16121108)
436310.76	3773338.65	0.00118	(16121108)	436340.76	3773338.65	0.00173	(16121108)
436370.76	3773338.65	0.00380	(16121108)	436400.76	3773338.65	0.00400	(16121108)
436430.76	3773338.65	0.00177	(16121108)	436460.76	3773338.65	0.00119	(16121108)
436490.76	3773338.65	0.00092	(16121108)	436520.76	3773338.65	0.00075	(16121108)
436550.76	3773338.65	0.00066	(16010708)	436580.76	3773338.65	0.00060	(16010708)
436610.76	3773338.65	0.00055	(16010708)	436640.76	3773338.65	0.00050	(16010708)
436670.76	3773338.65	0.00047	(16010708)	436100.76	3773368.65	0.00040	(16121108)
436130.76	3773368.65	0.00044	(16121108)	436160.76	3773368.65	0.00049	(16121108)
436190.76	3773368.65	0.00056	(16121108)	436220.76	3773368.65	0.00064	(16121108)
436250.76	3773368.65	0.00075	(16121108)	436280.76	3773368.65	0.00091	(16121108)
436310.76	3773368.65	0.00118	(16121108)	436340.76	3773368.65	0.00173	(16121108)
436370.76	3773368.65	0.00378	(16121108)	436400.76	3773368.65	0.00403	(16121108)
436430.76	3773368.65	0.00177	(16121108)	436460.76	3773368.65	0.00120	(16121108)
436490.76	3773368.65	0.00092	(16121108)	436520.76	3773368.65	0.00075	(16121108)

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       436550.76   3773368.65        0.00067  (16010708)              436580.76
 3773368.65        0.00060  (16010708)
       436610.76   3773368.65        0.00055  (16010708)              436640.76
 3773368.65        0.00051  (16010708)
       436670.76   3773368.65        0.00047  (16010708)              436100.76
 3773398.65        0.00040  (16121108)
       436130.76   3773398.65        0.00044  (16121108)              436160.76
 3773398.65        0.00049  (16121108)
       436190.76   3773398.65        0.00056  (16121108)              436220.76
 3773398.65        0.00064  (16121108)
       436250.76   3773398.65        0.00075  (16121108)              436280.76
 3773398.65        0.00091  (16121108)
       436310.76   3773398.65        0.00118  (16121108)              436340.76
 3773398.65        0.00173  (16121108)
       436370.76   3773398.65        0.00377  (16121108)              436400.76
 3773398.65        0.00405  (16121108)
       436430.76   3773398.65        0.00178  (16121108)              436460.76
 3773398.65        0.00120  (16121108)
       436490.76   3773398.65        0.00092  (16121108)              436520.76
 3773398.65        0.00076  (16010708)
       436550.76   3773398.65        0.00067  (16010708)              436580.76
 3773398.65        0.00060  (16010708)
       436610.76   3773398.65        0.00055  (16010708)              436640.76
 3773398.65        0.00051  (16010708)
       436670.76   3773398.65        0.00047  (16010708)              437509.68
 3774019.01        0.00018  (12120208)
       437522.02   3774019.01        0.00018  (12120208)              437534.36
 3774019.01        0.00018  (12120208)
       437546.70   3774019.01        0.00018  (12120208)              437559.04
 3774019.01        0.00018  (12120208)
       437509.68   3774027.34        0.00018  (12120208)              437522.02
 3774027.34        0.00018  (12120208)
       437534.36   3774027.34        0.00018  (12120208)              437546.70
 3774027.34        0.00018  (12120208)
       437559.04   3774027.34        0.00018  (12120208)              437509.68
 3774035.67        0.00018  (12120208)
       437522.02   3774035.67        0.00018  (12120208)              437534.36
 3774035.67        0.00018  (12120208)
       437546.70   3774035.67        0.00018  (12120208)              437559.04
 3774035.67        0.00018  (12120208)
       437509.68   3774044.00        0.00018  (12120208)              437522.02
 3774044.00        0.00018  (12120208)
       437534.36   3774044.00        0.00018  (12120208)              437546.70
 3774044.00        0.00018  (12120208)
 *** AERMOD - VERSION  19191 ***   *** C:\Lakes\AERMOD View\Bridge Upland\Bridge
Upland.isc                   ***        01/15/20
 *** AERMET - VERSION  16216 ***   ***
                          ***       13:48:55
```

*** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

*** THE 1ST HIGHEST 8-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): L0001543 , L0001544 , L0001545 , L0001546 , L0001547 ,
L0001548 , L0001549 , L0001550 , L0001551 , L0001552 , L0001553 , L0001554 , L0001555 ,
L0001556 , L0001557 , L0001558 , L0001559 , L0001560 , L0001561 , L0001562 , L0001563 ,
L0001564 , L0001565 , L0001566 , L0001567 , L0001568 , L0001569 , L0001570 , . . . ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF PM_10 IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)	X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)
437559.04	3774044.00	0.00018	(12120208)	437509.68	3774052.33	0.00018	(12120208)
437522.02	3774052.33	0.00018	(12120208)	437534.36	3774052.33	0.00018	(12120208)
437546.70	3774052.33	0.00018	(12120208)	437559.04	3774052.33	0.00018	(12120208)
437509.68	3774060.66	0.00018	(12120208)	437522.02	3774060.66	0.00018	(12120208)
437534.36	3774060.66	0.00018	(12120208)	437546.70	3774060.66	0.00018	(12120208)
437559.04	3774060.66	0.00018	(12120208)	437509.68	3774068.99	0.00018	(12120208)
437522.02	3774068.99	0.00018	(12120208)	437534.36	3774068.99	0.00018	(12120208)
437546.70	3774068.99	0.00018	(12120208)	437559.04	3774068.99	0.00018	(12120208)
437509.68	3774077.32	0.00018	(12120208)	437522.02	3774077.32	0.00018	(12120208)
437534.36	3774077.32	0.00018	(12120208)	437546.70	3774077.32	0.00018	(12120208)
437559.04	3774077.32	0.00018	(12120208)	437509.68	3774085.65	0.00018	(12120208)
437522.02	3774085.65	0.00018	(12120208)	437534.36			

```
3774085.65        0.00018  (12120208)
       437546.70   3774085.65        0.00018  (12120208)                437559.04
3774085.65        0.00018  (12120208)
       437509.68   3774093.98        0.00018  (12120208)                437522.02
3774093.98        0.00018  (12120208)
       437534.36   3774093.98        0.00018  (12120208)                437546.70
3774093.98        0.00018  (12120208)
       437559.04   3774093.98        0.00018  (12120208)                437509.68
3774102.31        0.00018  (12120208)
       437522.02   3774102.31        0.00018  (12120208)                437534.36
3774102.31        0.00018  (12120208)
       437546.70   3774102.31        0.00018  (12120208)                437559.04
3774102.31        0.00018  (12120208)
       437509.68   3774110.64        0.00018  (12120208)                437522.02
3774110.64        0.00018  (12120208)
       437534.36   3774110.64        0.00018  (12120208)                437546.70
3774110.64        0.00018  (12120208)
       437559.04   3774110.64        0.00018  (12120208)                437571.38
3774110.64        0.00017  (12120208)
       437583.72   3774110.64        0.00017  (12120208)                437596.06
3774110.64        0.00017  (12120208)
       437608.40   3774110.64        0.00017  (12120208)                437620.74
3774110.64        0.00017  (12120208)
       437633.08   3774110.64        0.00017  (12120208)                437645.42
3774110.64        0.00016  (12120208)
       437657.76   3774110.64        0.00016  (12120208)                437670.10
3774110.64        0.00016  (12120208)
       437682.44   3774110.64        0.00016  (12120208)                437694.78
3774110.64        0.00016  (12120208)
       437707.12   3774110.64        0.00016  (12120208)                437719.46
3774110.64        0.00016  (12120208)
       437731.80   3774110.64        0.00015  (12120208)                437744.14
3774110.64        0.00015  (12120208)
       437756.48   3774110.64        0.00015  (12120208)                437509.68
3774118.97        0.00018  (12120208)
       437522.02   3774118.97        0.00018  (12120208)                437534.36
3774118.97        0.00018  (12120208)
       437546.70   3774118.97        0.00018  (12120208)                437559.04
3774118.97        0.00018  (12120208)
       437571.38   3774118.97        0.00017  (12120208)                437583.72
3774118.97        0.00017  (12120208)
       437596.06   3774118.97        0.00017  (12120208)                437608.40
3774118.97        0.00017  (12120208)
       437620.74   3774118.97        0.00017  (12120208)                437633.08
3774118.97        0.00017  (12120208)
       437645.42   3774118.97        0.00016  (12120208)                437657.76
3774118.97        0.00016  (12120208)
       437670.10   3774118.97        0.00016  (12120208)                437682.44
```

3774118.97 0.00016 (12120208)
437694.78 3774118.97 0.00016 (12120208) 437707.12
3774118.97 0.00016 (12120208)
437719.46 3774118.97 0.00016 (12120208) 437731.80
3774118.97 0.00015 (12120208)
437744.14 3774118.97 0.00015 (12120208) 437756.48
3774118.97 0.00015 (12120208)
437509.68 3774127.30 0.00018 (12120208) 437522.02
3774127.30 0.00018 (12120208)

*** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

*** THE 1ST HIGHEST 8-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): L0001543 , L0001544 , L0001545 , L0001546 , L0001547 ,
L0001548 , L0001549 , L0001550 , L0001551 , L0001552 , L0001553 , L0001554 , L0001555 ,
L0001556 , L0001557 , L0001558 , L0001559 , L0001560 , L0001561 , L0001562 , L0001563 ,
L0001564 , L0001565 , L0001566 , L0001567 , L0001568 , L0001569 , L0001570 , . . . ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF PM_10 IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)	X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)
437534.36	3774127.30	0.00018	(12120208)	437546.70	3774127.30	0.00018	(12120208)
437559.04	3774127.30	0.00018	(12120208)	437571.38	3774127.30	0.00017	(12120208)
437583.72	3774127.30	0.00017	(12120208)	437596.06	3774127.30	0.00017	(12120208)
437608.40	3774127.30	0.00017	(12120208)	437620.74	3774127.30	0.00017	(12120208)
437633.08	3774127.30	0.00016	(12120208)	437645.42	3774127.30	0.00016	(12120208)

```
       437657.76   3774127.30        0.00016  (12120208)              437670.10
3774127.30        0.00016  (12120208)
       437682.44   3774127.30        0.00016  (12120208)              437694.78
3774127.30        0.00016  (12120208)
       437707.12   3774127.30        0.00016  (12120208)              437719.46
3774127.30        0.00016  (12120208)
       437731.80   3774127.30        0.00015  (12120208)              437744.14
3774127.30        0.00015  (12120208)
       437756.48   3774127.30        0.00015  (12120208)              437509.68
3774135.63        0.00018  (12120208)
       437522.02   3774135.63        0.00018  (12120208)              437534.36
3774135.63        0.00018  (12120208)
       437546.70   3774135.63        0.00018  (12120208)              437559.04
3774135.63        0.00018  (12120208)
       437571.38   3774135.63        0.00017  (12120208)              437583.72
3774135.63        0.00017  (12120208)
       437596.06   3774135.63        0.00017  (12120208)              437608.40
3774135.63        0.00017  (12120208)
       437620.74   3774135.63        0.00017  (12120208)              437633.08
3774135.63        0.00017  (12120208)
       437645.42   3774135.63        0.00016  (12120208)              437657.76
3774135.63        0.00016  (12120208)
       437670.10   3774135.63        0.00016  (12120208)              437682.44
3774135.63        0.00016  (12120208)
       437694.78   3774135.63        0.00016  (12120208)              437707.12
3774135.63        0.00016  (12120208)
       437719.46   3774135.63        0.00016  (12120208)              437731.80
3774135.63        0.00015  (12120208)
       437744.14   3774135.63        0.00015  (12120208)              437756.48
3774135.63        0.00015  (12120208)
       437509.68   3774143.96        0.00018  (12120208)              437522.02
3774143.96        0.00018  (12120208)
       437534.36   3774143.96        0.00018  (12120208)              437546.70
3774143.96        0.00018  (12120208)
       437559.04   3774143.96        0.00018  (12120208)              437571.38
3774143.96        0.00017  (12120208)
       437583.72   3774143.96        0.00017  (12120208)              437596.06
3774143.96        0.00017  (12120208)
       437608.40   3774143.96        0.00017  (12120208)              437620.74
3774143.96        0.00017  (12120208)
       437633.08   3774143.96        0.00017  (12120208)              437645.42
3774143.96        0.00016  (12120208)
       437657.76   3774143.96        0.00016  (12120208)              437670.10
3774143.96        0.00016  (12120208)
       437682.44   3774143.96        0.00016  (12120208)              437694.78
3774143.96        0.00016  (12120208)
       437707.12   3774143.96        0.00016  (12120208)              437719.46
3774143.96        0.00016  (12120208)
```

```
       437731.80   3774143.96        0.00015  (12120208)               437744.14
 3774143.96        0.00015  (12120208)
       437756.48   3774143.96        0.00015  (12120208)               437509.68
 3774152.29        0.00018  (12120208)
       437522.02   3774152.29        0.00018  (12120208)               437534.36
 3774152.29        0.00018  (12120208)
       437546.70   3774152.29        0.00018  (12120208)               437559.04
 3774152.29        0.00018  (12120208)
       437571.38   3774152.29        0.00017  (12120208)               437583.72
 3774152.29        0.00017  (12120208)
       437596.06   3774152.29        0.00017  (12120208)               437608.40
 3774152.29        0.00017  (12120208)
       437620.74   3774152.29        0.00017  (12120208)               437633.08
 3774152.29        0.00017  (12120208)
       437645.42   3774152.29        0.00016  (12120208)               437657.76
 3774152.29        0.00016  (12120208)
       437670.10   3774152.29        0.00016  (12120208)               437682.44
 3774152.29        0.00016  (12120208)
       437694.78   3774152.29        0.00016  (12120208)               437707.12
 3774152.29        0.00016  (12120208)
       437719.46   3774152.29        0.00016  (12120208)               437731.80
 3774152.29        0.00015  (12120208)
```



```
 *** MODELOPTs:    RegDFAULT  CONC  ELEV  URBAN  ADJ_U*

                               *** THE   1ST HIGHEST  8-HR AVERAGE CONCENTRATION
VALUES FOR SOURCE GROUP:  ALL      ***
                                   INCLUDING SOURCE(S):     L0001543    , L0001544
 , L0001545    , L0001546    , L0001547    ,
                 L0001548    , L0001549    , L0001550    , L0001551    , L0001552
 , L0001553    , L0001554    , L0001555    ,
                 L0001556    , L0001557    , L0001558    , L0001559    , L0001560
 , L0001561    , L0001562    , L0001563    ,
                 L0001564    , L0001565    , L0001566    , L0001567    , L0001568
 , L0001569    , L0001570    ,  . . .      ,

                                                *** DISCRETE CARTESIAN RECEPTOR POINTS
***

                                              ** CONC OF PM_10    IN MICROGRAMS/M**3
                    **

      X-COORD (M)  Y-COORD (M)        CONC     (YYMMDDHH)              X-COORD (M)
```

Y-COORD (M)	CONC	(YYMMDDHH)			
437744.14	3774152.29	0.00015	(12120208)	437756.48	3774152.29
0.00015	(12120208)				
437509.68	3774160.62	0.00018	(12120208)	437522.02	3774160.62
0.00018	(12120208)				
437534.36	3774160.62	0.00018	(12120208)	437546.70	3774160.62
0.00018	(12120208)				
437559.04	3774160.62	0.00018	(12120208)	437571.38	3774160.62
0.00017	(12120208)				
437583.72	3774160.62	0.00017	(12120208)	437596.06	3774160.62
0.00017	(12120208)				
437608.40	3774160.62	0.00017	(12120208)	437620.74	3774160.62
0.00017	(12120208)				
437633.08	3774160.62	0.00017	(12120208)	437645.42	3774160.62
0.00016	(12120208)				
437657.76	3774160.62	0.00016	(12120208)	437670.10	3774160.62
0.00016	(12120208)				
437682.44	3774160.62	0.00016	(12120208)	437694.78	3774160.62
0.00016	(12120208)				
437707.12	3774160.62	0.00016	(12120208)	437719.46	3774160.62
0.00016	(12120208)				
437731.80	3774160.62	0.00015	(12120208)	437744.14	3774160.62
0.00015	(12120208)				
437756.48	3774160.62	0.00015	(12120208)	437509.68	3774168.95
0.00018	(12120208)				
437522.02	3774168.95	0.00018	(12120208)	437534.36	3774168.95
0.00018	(12120208)				
437546.70	3774168.95	0.00018	(12120208)	437559.04	3774168.95
0.00018	(12120208)				
437571.38	3774168.95	0.00017	(12120208)	437583.72	3774168.95
0.00017	(12120208)				
437596.06	3774168.95	0.00017	(12120208)	437608.40	3774168.95
0.00017	(12120208)				
437620.74	3774168.95	0.00017	(12120208)	437633.08	3774168.95
0.00017	(12120208)				
437645.42	3774168.95	0.00016	(12120208)	437657.76	3774168.95
0.00016	(12120208)				
437670.10	3774168.95	0.00016	(12120208)	437682.44	3774168.95
0.00016	(12120208)				
437694.78	3774168.95	0.00016	(12120208)	437707.12	3774168.95
0.00016	(12120208)				
437719.46	3774168.95	0.00015	(12120208)	437731.80	3774168.95
0.00015	(12120208)				
437744.14	3774168.95	0.00015	(12120208)	437756.48	3774168.95
0.00015	(12120208)				
437509.68	3774177.28	0.00018	(12120208)	437522.02	

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 3774177.28         0.00018  (12120208)
       437534.36   3774177.28        0.00018  (12120208)               437546.70
 3774177.28         0.00018  (12120208)
       437559.04   3774177.28        0.00018  (12120208)               437571.38
 3774177.28         0.00017  (12120208)
       437583.72   3774177.28        0.00017  (12120208)               437596.06
 3774177.28         0.00017  (12120208)
       437608.40   3774177.28        0.00017  (12120208)               437620.74
 3774177.28         0.00017  (12120208)
       437633.08   3774177.28        0.00017  (12120208)               437645.42
 3774177.28         0.00016  (12120208)
       437657.76   3774177.28        0.00016  (12120208)               437670.10
 3774177.28         0.00016  (12120208)
       437682.44   3774177.28        0.00016  (12120208)               437694.78
 3774177.28         0.00016  (12120208)
       437707.12   3774177.28        0.00016  (12120208)               437719.46
 3774177.28         0.00015  (12120208)
       437731.80   3774177.28        0.00015  (12120208)               437744.14
 3774177.28         0.00015  (12120208)
       437756.48   3774177.28        0.00015  (12120208)               437509.68
 3774185.61         0.00018  (12120208)
       437522.02   3774185.61        0.00018  (12120208)               437534.36
 3774185.61         0.00018  (12120208)
       437546.70   3774185.61        0.00018  (12120208)               437559.04
 3774185.61         0.00018  (12120208)
       437571.38   3774185.61        0.00017  (12120208)               437583.72
 3774185.61         0.00017  (12120208)
       437596.06   3774185.61        0.00017  (12120208)               437608.40
 3774185.61         0.00017  (12120208)
       437620.74   3774185.61        0.00017  (12120208)               437633.08
 3774185.61         0.00017  (12120208)
       437645.42   3774185.61        0.00016  (12120208)               437657.76
 3774185.61         0.00016  (12120208)
       437670.10   3774185.61        0.00016  (12120208)               437682.44
 3774185.61         0.00016  (12120208)
 *** AERMOD - VERSION  19191 ***   *** C:\Lakes\AERMOD View\Bridge Upland\Bridge
Upland.isc                  ***        01/15/20
 *** AERMET - VERSION  16216 ***   ***
                         ***        13:48:55

                                   PAGE 112
 *** MODELOPTs:    RegDFAULT  CONC  ELEV  URBAN  ADJ_U*

                               *** THE   1ST HIGHEST  8-HR AVERAGE CONCENTRATION
VALUES FOR SOURCE GROUP:  ALL      ***
                                  INCLUDING SOURCE(S):     L0001543    , L0001544
 , L0001545    , L0001546    , L0001547    ,
                L0001548    , L0001549    , L0001550    , L0001551    , L0001552
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, L0001553 , L0001554 , L0001555 ,
L0001556 , L0001557 , L0001558 , L0001559 , L0001560
, L0001561 , L0001562 , L0001563 ,
L0001564 , L0001565 , L0001566 , L0001567 , L0001568
, L0001569 , L0001570 , . . . ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF PM_10 IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)	X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)
437694.78	3774185.61	0.00016	(12120208)	437707.12	3774185.61	0.00016	(12120208)
437719.46	3774185.61	0.00015	(12120208)	437731.80	3774185.61	0.00015	(12120208)
437744.14	3774185.61	0.00015	(12120208)	437756.48	3774185.61	0.00015	(12120208)
436401.45	3773426.38	0.00395	(16121108)	436409.59	3773426.38	0.00290	(16121108)
436417.73	3773426.38	0.00232	(16121108)	436425.87	3773426.38	0.00195	(16121108)
436434.01	3773426.38	0.00169	(16121108)	436442.15	3773426.38	0.00150	(16121108)
436450.29	3773426.38	0.00135	(16121108)	436458.43	3773426.38	0.00123	(16121108)
436466.57	3773426.38	0.00113	(16121108)	436474.71	3773426.38	0.00105	(16121108)
436482.85	3773426.38	0.00098	(16121108)	436490.99	3773426.38	0.00092	(16121108)
436499.13	3773426.38	0.00087	(16121108)	436507.27	3773426.38	0.00082	(16121108)
436515.41	3773426.38	0.00078	(16121108)	436523.55	3773426.38	0.00075	(16010708)
436531.69	3773426.38	0.00072	(16010708)	436539.83	3773426.38	0.00070	(16010708)
436547.97	3773426.38	0.00068	(16010708)	436556.11	3773426.38	0.00066	(16010708)
436401.45	3773445.23	0.00396	(16121108)	436409.59	3773445.23	0.00290	(16121108)
436417.73	3773445.23	0.00232	(16121108)	436425.87	3773445.23	0.00195	(16121108)
436434.01	3773445.23	0.00169	(16121108)	436442.15	3773445.23	0.00150	(16121108)

```
       436450.29   3773445.23        0.00135  (16121108)              436458.43
3773445.23        0.00123  (16121108)
       436466.57   3773445.23        0.00113  (16121108)              436474.71
3773445.23        0.00105  (16121108)
       436482.85   3773445.23        0.00098  (16121108)              436490.99
3773445.23        0.00092  (16121108)
       436499.13   3773445.23        0.00087  (16121108)              436507.27
3773445.23        0.00082  (16121108)
       436515.41   3773445.23        0.00078  (16121108)              436523.55
3773445.23        0.00075  (16010708)
       436531.69   3773445.23        0.00073  (16010708)              436539.83
3773445.23        0.00070  (16010708)
       436547.97   3773445.23        0.00068  (16010708)              436556.11
3773445.23        0.00066  (16010708)
       436401.45   3773464.08        0.00397  (16121108)              436409.59
3773464.08        0.00291  (16121108)
       436417.73   3773464.08        0.00232  (16121108)              436425.87
3773464.08        0.00195  (16121108)
       436434.01   3773464.08        0.00169  (16121108)              436442.15
3773464.08        0.00150  (16121108)
       436450.29   3773464.08        0.00135  (16121108)              436458.43
3773464.08        0.00123  (16121108)
       436466.57   3773464.08        0.00113  (16121108)              436474.71
3773464.08        0.00105  (16121108)
       436482.85   3773464.08        0.00098  (16121108)              436490.99
3773464.08        0.00092  (16121108)
       436499.13   3773464.08        0.00087  (16121108)              436507.27
3773464.08        0.00082  (16121108)
       436515.41   3773464.08        0.00079  (16010708)              436523.55
3773464.08        0.00076  (16010708)
       436531.69   3773464.08        0.00073  (16010708)              436539.83
3773464.08        0.00071  (16010708)
       436547.97   3773464.08        0.00069  (16010708)              436556.11
3773464.08        0.00066  (16010708)
       436401.45   3773482.93        0.00397  (16121108)              436409.59
3773482.93        0.00291  (16121108)
       436417.73   3773482.93        0.00233  (16121108)              436425.87
3773482.93        0.00195  (16121108)
       436434.01   3773482.93        0.00169  (16121108)              436442.15
3773482.93        0.00150  (16121108)
       436450.29   3773482.93        0.00135  (16121108)              436458.43
3773482.93        0.00123  (16121108)
       436466.57   3773482.93        0.00113  (16121108)              436474.71
3773482.93        0.00105  (16121108)
       436482.85   3773482.93        0.00098  (16121108)              436490.99
3773482.93        0.00092  (16121108)
       436499.13   3773482.93        0.00087  (16121108)              436507.27
3773482.93        0.00083  (16010708)
```

 *** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

                                *** THE   1ST HIGHEST 8-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL   ***
                                   INCLUDING SOURCE(S):   L0001543   , L0001544
 , L0001545   , L0001546   , L0001547   ,
                 L0001548   , L0001549   , L0001550   , L0001551   , L0001552
 , L0001553   , L0001554   , L0001555   ,
                 L0001556   , L0001557   , L0001558   , L0001559   , L0001560
 , L0001561   , L0001562   , L0001563   ,
                 L0001564   , L0001565   , L0001566   , L0001567   , L0001568
 , L0001569   , L0001570   , . . .   ,

                                                *** DISCRETE CARTESIAN RECEPTOR POINTS ***

                                             ** CONC OF PM_10   IN MICROGRAMS/M**3
                    **

      X-COORD (M) Y-COORD (M)   CONC   (YYMMDDHH)   X-COORD (M) Y-COORD (M)   CONC   (YYMMDDHH)
 -
       436515.41   3773482.93   0.00079 (16010708)   436523.55   3773482.93   0.00077 (16010708)
       436531.69   3773482.93   0.00074 (16010708)   436539.83   3773482.93   0.00071 (16010708)
       436547.97   3773482.93   0.00069 (16010708)   436556.11   3773482.93   0.00067 (16010708)
       436401.45   3773501.78   0.00398 (16121108)   436409.59   3773501.78   0.00292 (16121108)
       436417.73   3773501.78   0.00233 (16121108)   436425.87   3773501.78   0.00195 (16121108)
       436434.01   3773501.78   0.00169 (16121108)   436442.15   3773501.78   0.00150 (16121108)
       436450.29   3773501.78   0.00135 (16121108)   436458.43   3773501.78   0.00123 (16121108)
       436466.57   3773501.78   0.00114 (16121108)   436474.71   3773501.78   0.00105 (16121108)
       436482.85   3773501.78   0.00098 (16121108)   436490.99   3773501.78   0.00092 (16121108)
       436499.13   3773501.78   0.00087 (16121108)   436507.27

3773501.78 0.00083 (16010708)
436515.41 3773501.78 0.00080 (16010708) 436523.55
3773501.78 0.00077 (16010708)
436531.69 3773501.78 0.00074 (16010708) 436539.83
3773501.78 0.00072 (16010708)
436547.97 3773501.78 0.00069 (16010708) 436556.11
3773501.78 0.00067 (16010708)
436401.45 3773520.63 0.00399 (16121108) 436409.59
3773520.63 0.00292 (16121108)
436417.73 3773520.63 0.00233 (16121108) 436425.87
3773520.63 0.00196 (16121108)
436434.01 3773520.63 0.00170 (16121108) 436442.15
3773520.63 0.00150 (16121108)
436450.29 3773520.63 0.00135 (16121108) 436458.43
3773520.63 0.00123 (16121108)
436466.57 3773520.63 0.00114 (16121108) 436474.71
3773520.63 0.00105 (16121108)
436482.85 3773520.63 0.00098 (16121108) 436490.99
3773520.63 0.00092 (16121108)
436499.13 3773520.63 0.00087 (16121108) 436507.27
3773520.63 0.00083 (16010708)
436515.41 3773520.63 0.00080 (16010708) 436523.55
3773520.63 0.00077 (16010708)
436531.69 3773520.63 0.00074 (16010708) 436539.83
3773520.63 0.00071 (16010708)
436547.97 3773520.63 0.00069 (16010708) 436556.11
3773520.63 0.00067 (16010708)
436401.45 3773539.48 0.00399 (16121108) 436409.59
3773539.48 0.00292 (16121108)
436417.73 3773539.48 0.00233 (16121108) 436425.87
3773539.48 0.00196 (16121108)
436434.01 3773539.48 0.00170 (16121108) 436442.15
3773539.48 0.00150 (16121108)
436450.29 3773539.48 0.00135 (16121108) 436458.43
3773539.48 0.00123 (16121108)
436466.57 3773539.48 0.00114 (16121108) 436474.71
3773539.48 0.00105 (16121108)
436482.85 3773539.48 0.00098 (16121108) 436490.99
3773539.48 0.00092 (16121108)
436499.13 3773539.48 0.00087 (16121108) 436507.27
3773539.48 0.00083 (16121108)
436515.41 3773539.48 0.00079 (16010708) 436523.55
3773539.48 0.00076 (16010708)
436531.69 3773539.48 0.00074 (16010708) 436539.83
3773539.48 0.00071 (16010708)
436547.97 3773539.48 0.00069 (16010708) 436556.11
3773539.48 0.00067 (16010708)
436401.45 3773558.33 0.00400 (16121108) 436409.59

3773558.33 0.00293 (16121108)
436417.73 3773558.33 0.00233 (16121108) 436425.87
3773558.33 0.00196 (16121108)
436434.01 3773558.33 0.00170 (16121108) 436442.15
3773558.33 0.00150 (16121108)
436450.29 3773558.33 0.00135 (16121108) 436458.43
3773558.33 0.00124 (16121108)
436466.57 3773558.33 0.00114 (16121108) 436474.71
3773558.33 0.00106 (16121108)
436482.85 3773558.33 0.00099 (16121108) 436490.99
3773558.33 0.00092 (16121108)
436499.13 3773558.33 0.00087 (16121108) 436507.27
3773558.33 0.00083 (16121108)

*** AERMOD - VERSION 19191 *** *** C:\Lakes\AERMOD View\Bridge Upland\Bridge Upland.isc *** 01/15/20
*** AERMET - VERSION 16216 *** *** *** 13:48:55

*** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

*** THE 1ST HIGHEST 8-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): L0001543 , L0001544 , L0001545 , L0001546 , L0001547 ,
L0001548 , L0001549 , L0001550 , L0001551 , L0001552 , L0001553 , L0001554 , L0001555 ,
L0001556 , L0001557 , L0001558 , L0001559 , L0001560 , L0001561 , L0001562 , L0001563 ,
L0001564 , L0001565 , L0001566 , L0001567 , L0001568 , L0001569 , L0001570 , . . . ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF PM_10 IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)	X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)
436515.41	3773558.33	0.00079	(16010708)	436523.55	3773558.33	0.00076	(16010708)
436531.69	3773558.33	0.00073	(16010708)	436539.83	3773558.33	0.00071	(16010708)
436547.97	3773558.33	0.00069	(16010708)	436556.11	3773558.33	0.00067	(16010708)

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       436401.45   3773577.18        0.00401  (16121108)              436409.59
3773577.18        0.00293  (16121108)
       436417.73   3773577.18        0.00234  (16121108)              436425.87
3773577.18        0.00196  (16121108)
       436434.01   3773577.18        0.00170  (16121108)              436442.15
3773577.18        0.00150  (16121108)
       436450.29   3773577.18        0.00136  (16121108)              436458.43
3773577.18        0.00124  (16121108)
       436466.57   3773577.18        0.00114  (16121108)              436474.71
3773577.18        0.00106  (16121108)
       436482.85   3773577.18        0.00099  (16121108)              436490.99
3773577.18        0.00093  (16121108)
       436499.13   3773577.18        0.00087  (16121108)              436507.27
3773577.18        0.00083  (16121108)
       436515.41   3773577.18        0.00079  (16010708)              436523.55
3773577.18        0.00076  (16010708)
       436531.69   3773577.18        0.00073  (16010708)              436539.83
3773577.18        0.00071  (16010708)
       436547.97   3773577.18        0.00069  (16010708)              436556.11
3773577.18        0.00067  (16010708)
       436401.45   3773596.03        0.00401  (16121108)              436409.59
3773596.03        0.00293  (16121108)
       436417.73   3773596.03        0.00234  (16121108)              436425.87
3773596.03        0.00196  (16121108)
       436434.01   3773596.03        0.00170  (16121108)              436442.15
3773596.03        0.00151  (16121108)
       436450.29   3773596.03        0.00136  (16121108)              436458.43
3773596.03        0.00124  (16121108)
       436466.57   3773596.03        0.00114  (16121108)              436474.71
3773596.03        0.00106  (16121108)
       436482.85   3773596.03        0.00099  (16121108)              436490.99
3773596.03        0.00093  (16121108)
       436499.13   3773596.03        0.00087  (16121108)              436507.27
3773596.03        0.00083  (16121108)
       436515.41   3773596.03        0.00079  (16121108)              436523.55
3773596.03        0.00076  (16010708)
       436531.69   3773596.03        0.00073  (16010708)              436539.83
3773596.03        0.00071  (16010708)
       436547.97   3773596.03        0.00069  (16010708)              436556.11
3773596.03        0.00067  (16010708)
       436401.45   3773614.88        0.00403  (16121108)              436409.59
3773614.88        0.00294  (16121108)
       436417.73   3773614.88        0.00234  (16121108)              436425.87
3773614.88        0.00196  (16121108)
       436434.01   3773614.88        0.00170  (16121108)              436442.15
3773614.88        0.00151  (16121108)
       436450.29   3773614.88        0.00136  (16121108)              436458.43
3773614.88        0.00124  (16121108)
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       436466.57   3773614.88        0.00114  (16121108)               436474.71
 3773614.88        0.00106  (16121108)
       436482.85   3773614.88        0.00099  (16121108)               436490.99
 3773614.88        0.00093  (16121108)
       436499.13   3773614.88        0.00087  (16121108)               436507.27
 3773614.88        0.00083  (16121108)
       436515.41   3773614.88        0.00079  (16010708)               436523.55
 3773614.88        0.00077  (16010708)
       436531.69   3773614.88        0.00074  (16010708)               436539.83
 3773614.88        0.00071  (16010708)
       436547.97   3773614.88        0.00069  (16010708)               436556.11
 3773614.88        0.00067  (16010708)
       436401.45   3773633.73        0.00404  (16121108)               436409.59
 3773633.73        0.00295  (16121108)
       436417.73   3773633.73        0.00235  (16121108)               436425.87
 3773633.73        0.00197  (16121108)
       436434.01   3773633.73        0.00170  (16121108)               436442.15
 3773633.73        0.00151  (16121108)
       436450.29   3773633.73        0.00136  (16121108)               436458.43
 3773633.73        0.00124  (16121108)
       436466.57   3773633.73        0.00114  (16121108)               436474.71
 3773633.73        0.00106  (16121108)
       436482.85   3773633.73        0.00099  (16121108)               436490.99
 3773633.73        0.00093  (16121108)
       436401.45   3773652.58        0.00405  (16121108)               436409.59
 3773652.58        0.00295  (16121108)
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 *** MODELOPTs:    RegDFAULT  CONC  ELEV  URBAN  ADJ_U*

                               *** THE   1ST HIGHEST  8-HR AVERAGE CONCENTRATION
VALUES FOR SOURCE GROUP:  ALL      ***
                                  INCLUDING SOURCE(S):     L0001543    , L0001544
 , L0001545    , L0001546    , L0001547    ,
                 L0001548    , L0001549    , L0001550    , L0001551    , L0001552
 , L0001553    , L0001554    , L0001555    ,
                 L0001556    , L0001557    , L0001558    , L0001559    , L0001560
 , L0001561    , L0001562    , L0001563    ,
                 L0001564    , L0001565    , L0001566    , L0001567    , L0001568
 , L0001569    , L0001570    ,  . . .      ,

                                                *** DISCRETE CARTESIAN RECEPTOR POINTS
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X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)	X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)
436417.73	3773652.58	0.00235	(16121108)	436425.87	3773652.58	0.00197	(16121108)
436434.01	3773652.58	0.00171	(16121108)	436442.15	3773652.58	0.00151	(16121108)
436450.29	3773652.58	0.00136	(16121108)	436458.43	3773652.58	0.00124	(16121108)
436466.57	3773652.58	0.00114	(16121108)	436474.71	3773652.58	0.00106	(16121108)
436482.85	3773652.58	0.00099	(16121108)	436490.99	3773652.58	0.00093	(16121108)
436401.45	3773671.43	0.00405	(16121108)	436409.59	3773671.43	0.00295	(16121108)
436417.73	3773671.43	0.00235	(16121108)	436425.87	3773671.43	0.00197	(16121108)
436434.01	3773671.43	0.00171	(16121108)	436442.15	3773671.43	0.00151	(16121108)
436450.29	3773671.43	0.00136	(16121108)	436458.43	3773671.43	0.00124	(16121108)
436466.57	3773671.43	0.00114	(16121108)	436474.71	3773671.43	0.00106	(16121108)
436482.85	3773671.43	0.00099	(16121108)	436490.99	3773671.43	0.00093	(16121108)
436401.45	3773690.28	0.00406	(16121108)	436409.59	3773690.28	0.00296	(16121108)
436417.73	3773690.28	0.00235	(16121108)	436425.87	3773690.28	0.00197	(16121108)
436434.01	3773690.28	0.00171	(16121108)	436442.15	3773690.28	0.00151	(16121108)
436450.29	3773690.28	0.00136	(16121108)	436458.43	3773690.28	0.00124	(16121108)
436466.57	3773690.28	0.00114	(16121108)	436474.71	3773690.28	0.00106	(16121108)
436482.85	3773690.28	0.00099	(16121108)	436490.99	3773690.28	0.00093	(16121108)
436401.45	3773709.13	0.00407	(16121108)	436409.59	3773709.13	0.00296	(16121108)
436417.73	3773709.13	0.00236	(16121108)	436425.87	3773709.13	0.00198	(16121108)
436434.01	3773709.13	0.00171	(16121108)	436442.15	3773709.13	0.00152	(16121108)
436450.29	3773709.13	0.00136	(16121108)	436458.43			

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 3773709.13        0.00124  (16121108)
       436466.57   3773709.13        0.00115  (16121108)                436474.71
 3773709.13        0.00106  (16121108)
       436482.85   3773709.13        0.00099  (16121108)                436490.99
 3773709.13        0.00093  (16121108)
       436401.45   3773727.98        0.00408  (16121108)                436409.59
 3773727.98        0.00297  (16121108)
       436417.73   3773727.98        0.00236  (16121108)                436425.87
 3773727.98        0.00198  (16121108)
       436434.01   3773727.98        0.00171  (16121108)                436442.15
 3773727.98        0.00152  (16121108)
       436450.29   3773727.98        0.00137  (16121108)                436458.43
 3773727.98        0.00125  (16121108)
       436466.57   3773727.98        0.00115  (16121108)                436474.71
 3773727.98        0.00106  (16121108)
       436482.85   3773727.98        0.00099  (16121108)                436490.99
 3773727.98        0.00093  (16121108)
       436401.45   3773746.83        0.00409  (16121108)                436409.59
 3773746.83        0.00297  (16121108)
       436417.73   3773746.83        0.00236  (16121108)                436425.87
 3773746.83        0.00198  (16121108)
       436434.01   3773746.83        0.00172  (16121108)                436442.15
 3773746.83        0.00152  (16121108)
       436450.29   3773746.83        0.00137  (16121108)                436458.43
 3773746.83        0.00125  (16121108)
       436466.57   3773746.83        0.00115  (16121108)                436474.71
 3773746.83        0.00107  (16121108)
       436482.85   3773746.83        0.00099  (16121108)                436490.99
 3773746.83        0.00093  (16121108)
       436401.45   3773765.68        0.00410  (16121108)                436409.59
 3773765.68        0.00298  (16121108)
       436417.73   3773765.68        0.00237  (16121108)                436425.87
 3773765.68        0.00198  (16121108)
       436434.01   3773765.68        0.00172  (16121108)                436442.15
 3773765.68        0.00152  (16121108)
       436450.29   3773765.68        0.00137  (16121108)                436458.43
 3773765.68        0.00125  (16121108)
       436466.57   3773765.68        0.00115  (16121108)                436474.71
 3773765.68        0.00107  (16121108)
 *** AERMOD - VERSION  19191 ***   *** C:\Lakes\AERMOD View\Bridge Upland\Bridge
Upland.isc                  ***        01/15/20
 *** AERMET - VERSION  16216 ***   ***
                       ***        13:48:55

                                  PAGE 116
 *** MODELOPTs:    RegDFAULT  CONC  ELEV  URBAN  ADJ_U*

                             *** THE   1ST HIGHEST  8-HR AVERAGE CONCENTRATION
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VALUES FOR SOURCE GROUP: ALL *** INCLUDING SOURCE(S): L0001543 , L0001544 , L0001545 , L0001546 , L0001547 , L0001548 , L0001549 , L0001550 , L0001551 , L0001552 , L0001553 , L0001554 , L0001555 , L0001556 , L0001557 , L0001558 , L0001559 , L0001560 , L0001561 , L0001562 , L0001563 , L0001564 , L0001565 , L0001566 , L0001567 , L0001568 , L0001569 , L0001570 , . . . ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF PM_10 IN MICROGRAMS/M**3 **

X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)	X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)
436482.85	3773765.68	0.00100	(16121108)	436490.99	3773765.68	0.00094	(16121108)
436401.45	3773784.53	0.00411	(16121108)	436409.59	3773784.53	0.00299	(16121108)
436417.73	3773784.53	0.00237	(16121108)	436425.87	3773784.53	0.00199	(16121108)
436434.01	3773784.53	0.00172	(16121108)	436442.15	3773784.53	0.00152	(16121108)
436450.29	3773784.53	0.00137	(16121108)	436458.43	3773784.53	0.00125	(16121108)
436466.57	3773784.53	0.00115	(16121108)	436474.71	3773784.53	0.00107	(16121108)
436482.85	3773784.53	0.00100	(16121108)	436490.99	3773784.53	0.00094	(16121108)
436401.45	3773803.38	0.00412	(16121108)	436409.59	3773803.38	0.00299	(16121108)
436417.73	3773803.38	0.00238	(16121108)	436425.87	3773803.38	0.00199	(16121108)
436434.01	3773803.38	0.00172	(16121108)	436442.15	3773803.38	0.00152	(16121108)
436450.29	3773803.38	0.00137	(16121108)	436458.43	3773803.38	0.00125	(16121108)
436466.57	3773803.38	0.00115	(16121108)	436474.71	3773803.38	0.00107	(16121108)
436482.85	3773803.38	0.00100	(16121108)	436490.99	3773803.38	0.00094	(16121108)

*** THE SUMMARY OF MAXIMUM ANNUAL RESULTS
AVERAGED OVER   5 YEARS ***

** CONC OF PM_10   IN MICROGRAMS/M**3
**

GROUP ID	NETWORK AVERAGE CONC	RECEPTOR (XR, YR, ZELEV, ZHILL, ZFLAG)	OF TYPE	GRID-ID
ALL	1ST HIGHEST VALUE IS	0.00192 AT (436401.45, 3773803.38, 398.06, 398.06, 0.00)	DC	
	2ND HIGHEST VALUE IS	0.00192 AT (436401.45, 3773784.53, 397.41, 397.41, 0.00)	DC	
	3RD HIGHEST VALUE IS	0.00191 AT (436401.45, 3773765.68, 396.77, 396.77, 0.00)	DC	
	4TH HIGHEST VALUE IS	0.00191 AT (436401.45, 3773746.83, 396.11, 396.11, 0.00)	DC	
	5TH HIGHEST VALUE IS	0.00190 AT (436400.76, 3773398.65, 384.52, 384.52, 0.00)	DC	
	6TH HIGHEST VALUE IS	0.00190 AT (436401.45, 3773727.98, 395.43, 395.43, 0.00)	DC	
	7TH HIGHEST VALUE IS	0.00190 AT (436401.45, 3773709.13, 394.74, 394.74, 0.00)	DC	
	8TH HIGHEST VALUE IS	0.00190 AT (436401.45, 3773690.28, 394.04, 394.04, 0.00)	DC	
	9TH HIGHEST VALUE IS	0.00189 AT (436400.76, 3773368.65, 383.62, 383.62, 0.00)	DC	
	10TH HIGHEST VALUE IS	0.00189 AT (436401.45, 3773671.43, 393.38, 393.38, 0.00)	DC	

*** RECEPTOR TYPES: GC = GRIDCART
                     GP = GRIDPOLR
                     DC = DISCCART
                     DP = DISCPOLR

*** THE SUMMARY OF HIGHEST 1-HR RESULTS ***

** CONC OF PM_10   IN MICROGRAMS/M**3
**

GROUP ID	AVERAGE CONC	DATE (YYMMDDHH)	RECEPTOR (XR, YR, ZELEV, ZHILL, ZFLAG)	NETWORK OF TYPE	GRID-ID
ALL	HIGH 1ST HIGH VALUE IS	0.00507	ON 15102517: AT (436401.45, 3773803.38, 398.06, 398.06, 0.00)	DC	

*** RECEPTOR TYPES: GC = GRIDCART
                     GP = GRIDPOLR
                     DC = DISCCART
                     DP = DISCPOLR

*** THE SUMMARY OF HIGHEST 8-HR RESULTS ***

** CONC OF PM_10   IN MICROGRAMS/M**3
**

GROUP ID	AVERAGE CONC	DATE (YYMMDDHH)	RECEPTOR (XR, YR, ZELEV, ZHILL, ZFLAG)	NETWORK OF TYPE	GRID-ID

ALL HIGH 1ST HIGH VALUE IS 0.00412 ON 16121108: AT (436401.45, 3773803.38, 398.06, 398.06, 0.00) DC

*** RECEPTOR TYPES: GC = GRIDCART
GP = GRIDPOLR
DC = DISCCART
DP = DISCPOLR

*** MODELOPTs: RegDFAULT CONC ELEV URBAN ADJ_U*

*** Message Summary : AERMOD Model Execution ***

--------- Summary of Total Messages --------

A Total of 0 Fatal Error Message(s)
A Total of 2 Warning Message(s)
A Total of 956 Informational Message(s)

A Total of 43848 Hours Were Processed

A Total of 49 Calm Hours Identified

A Total of 907 Missing Hours Identified (2.07 Percent)

******** FATAL ERROR MESSAGES ********
*** NONE ***

******** WARNING MESSAGES ********
ME W186 1688 MEOPEN: THRESH_1MIN 1-min ASOS wind speed threshold used 0.50
ME W187 1688 MEOPEN: ADJ_U* Option for Stable Low Winds used in AERMET

****
*** AERMOD Finishes Successfully ***
****

Attachment 4

Additional Study Intersections Memo

translutions
the transportation solutions company...

memorandum

DATE: January 26, 2020

TO: Casey Schooner, Kimley-Horn

FROM: Sandipan Bhattacharjee, P.E., T.E., AICP, ENV-SP

SUBJECT: Evaluation of Additional Intersections

The intersections in the study area for the Traffic Impact Analysis (TIA) prepared for the Bridge Point Upland project was determined in accordance to the requirements of the San Bernardino County Transportation Authority (SBCTA) Congestion Management Plan (CMP) Guidelines which are followed by the City of Upland. The Guidelines state that the analysis should include intersections where the project is anticipated to add 50 or more project trips during the a.m. or p.m. peak hour. During initial discussions, City staff requested that additional intersections that do not meet the 50-trip threshold be also included in the analysis. In fact, 8 of the 17 study intersections do not meet the 50-trip threshold. Therefore, the TIA included in the Draft IS/MND was conservative in analyzing more intersections than required under adopted guidelines. The trip distribution and study area were approved by the Cities of Upland, Montclair, and Claremont.

At the joint City Council and Planning Commission workshop held on January 9, 2020, comments were raised about the traffic patterns included in the TIA, and analysis was requested of intersections along 16th Street and Foothill Boulevard east of the Project site. This memorandum analyzes a scenario in which 25% of project trips are assumed to travel to and from the east on 16th Street and 25% of project trips travel to and from the east on Foothill Boulevard. In sum, this memorandum very conservatively analyzes half of the project trips traveling on these two roadways to the east; this is conservative since a much lower percentage of trips are actually expected to travel on 16th Street and Foothill Boulevard based on the location of residential and business uses in the area.

The following intersections have been analyzed in this memo:

1. Mountain Avenue/16th Street;
2. Mountain Avenue/Foothill Boulevard;
3. Euclid Avenue/Foothill Boulevard; and
4. Campus Avenue/16th Street.

The analysis was conducted by adding project trips to the future traffic volumes from the City's General Plan. It should be noted that since the General Plan already assumes development on the project site, adding project trips to the General Plan volumes results in higher traffic volumes than are anticipated to actually occur because development from the project is counted twice. The results of this analysis are included in Table A.

Table A: General Plan Build Out Intersection Levels of Service

	Intersection	Control	Without Project				With Project				Project Impact
			AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		
			Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS	
18	Mountain Avenue/16th Street	Signal	35.0	C	39.7	D	35.2	D	39.9	D	NO
19	Mountain Avenue/Foothill Boulevard	Signal	33.1	C	46.2	D	33.4	C	46.6	D	NO
20	Euclid Avenue/Foothill Boulevard	Signal	37.5	D	36.3	D	37.7	D	36.3	D	NO
21	Campus Avenue/16th Street	Signal	31.7	C	37.2	D	31.9	C	38.5	D	NO

Notes:

LOS = Level of Service

As shown on Table A, under General Plan Buildout conditions, these four intersections are anticipated to operate at acceptable levels of service (LOS D or better) under both without project and with project conditions. The highest additional delay caused by the project at any intersection, even with the assumption of 25% of project trips traveling through each intersection, is anticipated to be less than half a second. Therefore, the project is not anticipated to create a significant impact at any of the above intersections.

Further, the traffic volumes on 13th Street and 15th Street are much lower than those on 16th Street and Foothill Boulevard. Since the project does not have a significant impact at the intersections evaluated above, it is anticipated that there will be a less than significant impact at the intersections of Mountain Avenue/13th Street and Mountain Avenue/15th Street as well.

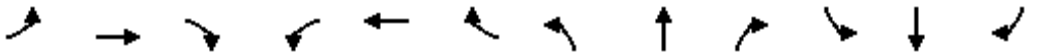
HCM 6th Signalized Intersection Summary
18: Mountain Avenue & 16th St

01/20/2020

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	70	280	150	120	600	50	110	530	40	170	1030	80
Future Volume (veh/h)	70	280	150	120	600	50	110	530	40	170	1030	80
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adj Flow Rate, veh/h	74	295	158	126	632	53	116	558	42	179	1084	84
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	0	0	0	0	0	0	0	0	0	0	0	0
Cap, veh/h	239	518	270	269	817	68	266	1264	95	279	1286	100
Arrive On Green	0.13	0.23	0.23	0.15	0.24	0.24	0.15	0.37	0.37	0.15	0.38	0.38
Sat Flow, veh/h	1810	2293	1197	1810	3372	282	1810	3403	256	1810	3395	263
Grp Volume(v), veh/h	74	231	222	126	338	347	116	295	305	179	576	592
Grp Sat Flow(s),veh/h/ln	1810	1805	1685	1810	1805	1849	1810	1805	1854	1810	1805	1853
Q Serve(g_s), s	3.0	9.1	9.4	5.1	14.0	14.0	4.7	9.8	9.9	7.4	23.3	23.3
Cycle Q Clear(g_c), s	3.0	9.1	9.4	5.1	14.0	14.0	4.7	9.8	9.9	7.4	23.3	23.3
Prop In Lane	1.00		0.71	1.00		0.15	1.00		0.14	1.00		0.14
Lane Grp Cap(c), veh/h	239	408	381	269	438	448	266	671	689	279	684	702
V/C Ratio(X)	0.31	0.57	0.58	0.47	0.77	0.77	0.44	0.44	0.44	0.64	0.84	0.84
Avail Cap(c_a), veh/h	285	465	434	285	465	476	285	671	689	348	684	702
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	0.58	0.58	0.58	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	31.4	27.5	27.6	31.2	28.2	28.3	31.1	18.9	18.9	31.8	22.7	22.7
Incr Delay (d2), s/veh	0.7	1.2	1.6	0.7	4.4	4.4	1.1	2.1	2.1	2.7	12.1	11.8
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.3	3.9	3.8	2.2	6.3	6.5	2.1	4.3	4.4	3.4	11.5	11.8
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	32.1	28.7	29.2	31.9	32.7	32.7	32.2	21.0	21.0	34.5	34.7	34.5
LnGrp LOS	C	C	C	C	C	C	C	C	C	C	C	C
Approach Vol, veh/h		527			811			716			1347	
Approach Delay, s/veh		29.4			32.5			22.8			34.6	
Approach LOS		C			C			C			C	

Timer - Assigned Phs	1	2	3	4	5	6	7	8
Phs Duration (G+Y+Rc), s	14.3	31.7	13.9	20.1	13.7	32.3	12.6	21.4
Change Period (Y+Rc), s	4.5	4.5	4.5	4.5	4.5	4.5	4.5	4.5
Max Green Setting (Gmax), s	12.9	20.9	10.1	18.1	10.1	23.7	10.1	18.1
Max Q Clear Time (g_c+I1), s	9.4	11.9	7.1	11.4	6.7	25.3	5.0	16.0
Green Ext Time (p_c), s	0.1	2.5	0.1	1.5	0.1	0.0	0.1	0.9

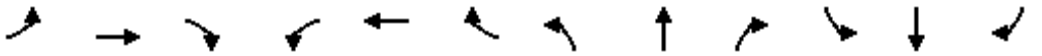
Intersection Summary	
HCM 6th Ctrl Delay	30.8
HCM 6th LOS	C



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	120	420	120	260	690	140	230	550	190	310	1010	150
Future Volume (veh/h)	120	420	120	260	690	140	230	550	190	310	1010	150
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adj Flow Rate, veh/h	126	442	126	274	726	147	242	579	200	326	1063	158
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	0	0	0	0	0	0	0	0	0	0	0	0
Cap, veh/h	522	701	198	548	937	418	546	1212	540	548	1533	228
Arrive On Green	0.15	0.25	0.25	0.16	0.26	0.26	0.16	0.34	0.34	0.16	0.34	0.34
Sat Flow, veh/h	3510	2778	785	3510	3610	1610	3510	3610	1610	3510	4559	677
Grp Volume(v), veh/h	126	286	282	274	726	147	242	579	200	326	806	415
Grp Sat Flow(s),veh/h/ln	1755	1805	1759	1755	1805	1610	1755	1805	1610	1755	1729	1778
Q Serve(g_s), s	2.5	11.3	11.4	5.7	14.9	6.0	5.0	10.2	7.5	6.9	16.1	16.2
Cycle Q Clear(g_c), s	2.5	11.3	11.4	5.7	14.9	6.0	5.0	10.2	7.5	6.9	16.1	16.2
Prop In Lane	1.00		0.45	1.00		1.00	1.00		1.00	1.00		0.38
Lane Grp Cap(c), veh/h	522	455	444	548	937	418	546	1212	540	548	1162	598
V/C Ratio(X)	0.24	0.63	0.64	0.50	0.77	0.35	0.44	0.48	0.37	0.59	0.69	0.69
Avail Cap(c_a), veh/h	549	496	484	549	993	443	549	1212	540	562	1162	598
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	0.45	0.45	0.45	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	30.1	26.6	26.6	30.9	27.5	24.1	30.6	21.0	20.2	31.4	23.0	23.0
Incr Delay (d2), s/veh	0.2	2.2	2.4	0.3	1.7	0.2	0.6	1.4	1.9	1.6	3.4	6.5
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.1	4.9	4.9	2.4	6.4	2.2	2.1	4.3	3.0	3.0	6.8	7.5
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	30.3	28.8	29.1	31.2	29.1	24.4	31.2	22.4	22.1	33.0	26.4	29.5
LnGrp LOS	C	C	C	C	C	C	C	C	C	C	C	C
Approach Vol, veh/h		694			1147			1021			1547	
Approach Delay, s/veh		29.2			29.0			24.4			28.6	
Approach LOS		C			C			C			C	

Timer - Assigned Phs	1	2	3	4	5	6	7	8
Phs Duration (G+Y+Rc), s	14.5	28.9	14.5	22.2	14.5	28.9	13.9	22.8
Change Period (Y+Rc), s	4.5	4.5	4.5	4.5	4.5	4.5	4.5	4.5
Max Green Setting (Gmax), s	10.3	22.2	10.0	19.5	10.0	22.5	10.0	19.5
Max Q Clear Time (g_c+I1), s	8.9	12.2	7.7	13.4	7.0	18.2	4.5	16.9
Green Ext Time (p_c), s	0.2	3.3	0.2	1.8	0.2	2.9	0.2	1.3

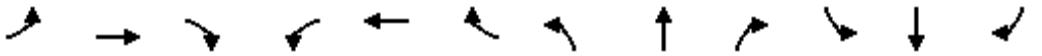
Intersection Summary	
HCM 6th Ctrl Delay	27.8
HCM 6th LOS	C



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	250	520	170	340	820	60	260	660	150	150	1270	150
Future Volume (veh/h)	250	520	170	340	820	60	260	660	150	150	1270	150
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adj Flow Rate, veh/h	263	547	179	358	863	63	274	695	158	158	1337	158
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	0	0	0	0	0	0	0	0	0	0	0	0
Cap, veh/h	547	1001	446	548	947	69	548	1134	506	276	1461	173
Arrive On Green	0.16	0.28	0.28	0.16	0.28	0.28	0.16	0.31	0.31	0.15	0.31	0.31
Sat Flow, veh/h	3510	3610	1610	3510	3411	249	3510	3610	1610	1810	4702	556
Grp Volume(v), veh/h	263	547	179	358	457	469	274	695	158	158	983	512
Grp Sat Flow(s),veh/h/ln	1755	1805	1610	1755	1805	1855	1755	1805	1610	1810	1729	1800
Q Serve(g_s), s	5.5	10.3	7.2	7.7	19.6	19.6	5.7	13.1	6.0	6.5	21.9	21.9
Cycle Q Clear(g_c), s	5.5	10.3	7.2	7.7	19.6	19.6	5.7	13.1	6.0	6.5	21.9	21.9
Prop In Lane	1.00		1.00	1.00		0.13	1.00		1.00	1.00		0.31
Lane Grp Cap(c), veh/h	547	1001	446	548	501	515	548	1134	506	276	1074	559
V/C Ratio(X)	0.48	0.55	0.40	0.65	0.91	0.91	0.50	0.61	0.31	0.57	0.92	0.92
Avail Cap(c_a), veh/h	549	1001	446	606	501	515	549	1134	506	285	1074	559
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	0.82	0.82	0.82	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	30.8	24.6	23.5	31.7	28.0	28.0	30.9	23.3	20.9	31.5	26.6	26.6
Incr Delay (d2), s/veh	0.5	0.5	0.5	2.2	20.9	20.5	0.7	2.5	1.6	2.6	13.4	22.0
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	2.3	4.3	2.7	3.3	11.0	11.2	2.4	5.7	2.4	3.0	10.5	12.3
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	31.3	25.1	24.0	33.9	48.9	48.5	31.6	25.8	22.5	34.1	40.0	48.6
LnGrp LOS	C	C	C	C	D	D	C	C	C	C	D	D
Approach Vol, veh/h		989			1284			1127			1653	
Approach Delay, s/veh		26.6			44.6			26.7			42.1	
Approach LOS		C			D			C			D	

Timer - Assigned Phs	1	2	3	4	5	6	7	8
Phs Duration (G+Y+Rc), s	14.2	27.1	14.5	24.2	14.5	26.9	14.5	24.2
Change Period (Y+Rc), s	4.5	4.5	4.5	4.5	4.5	4.5	4.5	4.5
Max Green Setting (Gmax), s	10.1	22.2	11.3	18.4	10.0	22.3	10.0	19.7
Max Q Clear Time (g_c+I1), s	8.5	15.1	9.7	12.3	7.7	23.9	7.5	21.6
Green Ext Time (p_c), s	0.1	3.0	0.2	2.2	0.2	0.0	0.2	0.0

Intersection Summary	
HCM 6th Ctrl Delay	36.3
HCM 6th LOS	D



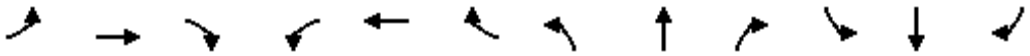
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	250	390	100	240	630	70	60	460	170	80	630	300
Future Volume (veh/h)	250	390	100	240	630	70	60	460	170	80	630	300
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adj Flow Rate, veh/h	263	411	105	253	663	74	63	484	179	84	663	316
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	0	0	0	0	0	0	0	0	0	0	0	0
Cap, veh/h	419	723	183	485	828	92	386	915	336	498	866	413
Arrive On Green	0.16	0.25	0.25	0.16	0.25	0.25	0.13	0.35	0.35	0.14	0.37	0.37
Sat Flow, veh/h	1810	2853	722	1810	3274	365	1810	2584	950	1810	2371	1130
Grp Volume(v), veh/h	263	259	257	253	365	372	63	337	326	84	505	474
Grp Sat Flow(s),veh/h/ln	1810	1805	1770	1810	1805	1834	1810	1805	1729	1810	1805	1697
Q Serve(g_s), s	8.0	10.0	10.2	7.7	15.2	15.2	1.5	11.9	12.0	1.9	19.7	19.7
Cycle Q Clear(g_c), s	8.0	10.0	10.2	7.7	15.2	15.2	1.5	11.9	12.0	1.9	19.7	19.7
Prop In Lane	1.00		0.41	1.00		0.20	1.00		0.55	1.00		0.67
Lane Grp Cap(c), veh/h	419	457	449	485	456	464	386	639	612	498	660	620
V/C Ratio(X)	0.63	0.57	0.57	0.52	0.80	0.80	0.16	0.53	0.53	0.17	0.77	0.77
Avail Cap(c_a), veh/h	421	469	460	489	469	477	445	639	612	535	660	620
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	0.86	0.86	0.86	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	18.4	26.0	26.1	17.2	28.0	28.0	13.7	20.5	20.6	11.6	22.4	22.4
Incr Delay (d2), s/veh	2.5	1.3	1.4	1.0	9.3	9.3	0.2	3.1	3.3	0.2	8.2	8.7
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	3.4	4.3	4.3	3.1	7.5	7.6	0.6	5.3	5.2	0.7	9.4	8.9
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	21.0	27.3	27.5	18.1	37.3	37.3	13.9	23.6	23.9	11.7	30.6	31.1
LnGrp LOS	C	C	C	B	D	D	B	C	C	B	C	C
Approach Vol, veh/h		779			990			726			1063	
Approach Delay, s/veh		25.2			32.4			22.9			29.3	
Approach LOS		C			C			C			C	

Timer - Assigned Phs	1	2	3	4	5	6	7	8
Phs Duration (G+Y+Rc), s	13.0	30.3	14.5	22.3	12.0	31.2	14.5	22.2
Change Period (Y+Rc), s	4.5	4.5	4.5	4.5	4.5	4.5	4.5	4.5
Max Green Setting (Gmax), s	10.1	23.5	10.1	18.3	10.1	23.5	10.1	18.3
Max Q Clear Time (g_c+I1), s	3.9	14.0	9.7	12.2	3.5	21.7	10.0	17.2
Green Ext Time (p_c), s	0.1	2.9	0.0	1.6	0.1	1.1	0.0	0.5

Intersection Summary	
HCM 6th Ctrl Delay	28.0
HCM 6th LOS	C

HCM 6th Signalized Intersection Summary
18: Mountain Avenue & 16th St

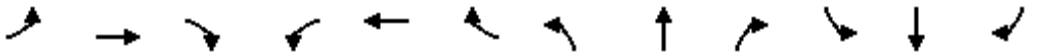
01/20/2020



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	170	650	140	80	330	50	180	990	130	140	740	100
Future Volume (veh/h)	170	650	140	80	330	50	180	990	130	140	740	100
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adj Flow Rate, veh/h	179	684	147	84	347	53	189	1042	137	147	779	105
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	0	0	0	0	0	0	0	0	0	0	0	0
Cap, veh/h	279	761	163	248	756	114	279	1136	149	274	1123	151
Arrive On Green	0.15	0.26	0.26	0.14	0.24	0.24	0.15	0.35	0.35	0.15	0.35	0.35
Sat Flow, veh/h	1810	2956	635	1810	3144	476	1810	3208	421	1810	3197	431
Grp Volume(v), veh/h	179	417	414	84	198	202	189	586	593	147	440	444
Grp Sat Flow(s),veh/h/ln	1810	1805	1786	1810	1805	1814	1810	1805	1824	1810	1805	1822
Q Serve(g_s), s	7.4	17.9	17.9	3.4	7.5	7.6	7.9	24.8	24.9	6.0	16.7	16.7
Cycle Q Clear(g_c), s	7.4	17.9	17.9	3.4	7.5	7.6	7.9	24.8	24.9	6.0	16.7	16.7
Prop In Lane	1.00		0.36	1.00		0.26	1.00		0.23	1.00		0.24
Lane Grp Cap(c), veh/h	279	465	460	248	434	436	279	639	646	274	634	640
V/C Ratio(X)	0.64	0.90	0.90	0.34	0.46	0.46	0.68	0.92	0.92	0.54	0.69	0.69
Avail Cap(c_a), veh/h	285	465	460	283	463	465	285	639	646	285	634	640
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	0.84	0.84	0.84	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	31.8	28.7	28.7	31.2	25.9	26.0	31.9	24.7	24.7	31.3	22.3	22.3
Incr Delay (d2), s/veh	4.7	20.0	20.3	0.7	0.6	0.6	6.1	20.1	20.2	1.8	6.2	6.1
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	3.5	10.0	9.9	1.5	3.2	3.3	3.8	13.5	13.7	2.7	7.8	7.9
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	36.5	48.7	49.0	31.9	26.5	26.6	38.0	44.9	44.9	33.2	28.4	28.4
LnGrp LOS	D	D	D	C	C	C	D	D	D	C	C	C
Approach Vol, veh/h		1010			484			1368			1031	
Approach Delay, s/veh		46.7			27.5			43.9			29.1	
Approach LOS		D			C			D			C	

Timer - Assigned Phs	1	2	3	4	5	6	7	8
Phs Duration (G+Y+Rc), s	14.1	30.3	13.0	22.6	14.4	30.1	14.3	21.2
Change Period (Y+Rc), s	4.5	4.5	4.5	4.5	4.5	4.5	4.5	4.5
Max Green Setting (Gmax), s	10.1	23.8	10.0	18.1	10.1	23.8	10.1	18.0
Max Q Clear Time (g_c+I1), s	8.0	26.9	5.4	19.9	9.9	18.7	9.4	9.6
Green Ext Time (p_c), s	0.1	0.0	0.1	0.0	0.0	2.5	0.0	1.5

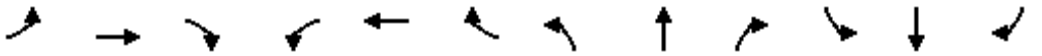
Intersection Summary	
HCM 6th Ctrl Delay	38.7
HCM 6th LOS	D



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	370	970	150	430	710	180	280	1060	240	260	740	140
Future Volume (veh/h)	370	970	150	430	710	180	280	1060	240	260	740	140
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adj Flow Rate, veh/h	389	1021	158	453	747	189	295	1116	253	274	779	147
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	0	0	0	0	0	0	0	0	0	0	0	0
Cap, veh/h	549	901	139	549	1038	463	548	1084	484	548	1317	247
Arrive On Green	0.16	0.29	0.29	0.16	0.29	0.29	0.16	0.30	0.30	0.16	0.30	0.30
Sat Flow, veh/h	3510	3133	484	3510	3610	1610	3510	3610	1610	3510	4389	821
Grp Volume(v), veh/h	389	588	591	453	747	189	295	1116	253	274	612	314
Grp Sat Flow(s),veh/h/ln	1755	1805	1813	1755	1805	1610	1755	1805	1610	1755	1729	1752
Q Serve(g_s), s	8.4	23.0	23.0	10.0	14.9	7.6	6.2	24.0	10.4	5.7	12.0	12.2
Cycle Q Clear(g_c), s	8.4	23.0	23.0	10.0	14.9	7.6	6.2	24.0	10.4	5.7	12.0	12.2
Prop In Lane	1.00		0.27	1.00		1.00	1.00		1.00	1.00		0.47
Lane Grp Cap(c), veh/h	549	519	521	549	1038	463	548	1084	484	548	1038	526
V/C Ratio(X)	0.71	1.13	1.13	0.83	0.72	0.41	0.54	1.03	0.52	0.50	0.59	0.60
Avail Cap(c_a), veh/h	549	519	521	549	1038	463	549	1084	484	549	1038	526
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	0.51	0.51	0.51	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	32.0	28.5	28.5	32.7	25.6	23.0	31.1	28.0	23.2	30.9	23.8	23.9
Incr Delay (d2), s/veh	4.2	81.3	82.1	5.4	1.3	0.3	1.0	35.2	4.0	0.7	2.5	4.9
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	3.8	21.1	21.4	4.5	6.3	2.8	2.6	15.1	4.3	2.4	5.1	5.6
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	36.2	109.8	110.6	38.1	26.9	23.3	32.2	63.1	27.2	31.6	26.3	28.8
LnGrp LOS	D	F	F	D	C	C	C	F	C	C	C	C
Approach Vol, veh/h		1568			1389			1664			1200	
Approach Delay, s/veh		91.8			30.0			52.2			28.1	
Approach LOS		F			C			D			C	

Timer - Assigned Phs	1	2	3	4	5	6	7	8
Phs Duration (G+Y+Rc), s	14.5	26.0	14.5	25.0	14.5	26.0	14.5	25.0
Change Period (Y+Rc), s	4.5	4.5	4.5	4.5	4.5	4.5	4.5	4.5
Max Green Setting (Gmax), s	10.0	21.5	10.0	20.5	10.0	21.5	10.0	20.5
Max Q Clear Time (g_c+I1), s	7.7	26.0	12.0	25.0	8.2	14.2	10.4	16.9
Green Ext Time (p_c), s	0.2	0.0	0.0	0.0	0.2	3.5	0.0	1.9

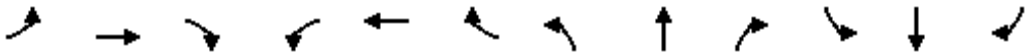
Intersection Summary			
HCM 6th Ctrl Delay		52.6	
HCM 6th LOS		D	



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	240	880	220	290	670	80	510	830	260	170	710	40
Future Volume (veh/h)	240	880	220	290	670	80	510	830	260	170	710	40
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adj Flow Rate, veh/h	253	926	232	305	705	84	537	874	274	179	747	42
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	0	0	0	0	0	0	0	0	0	0	0	0
Cap, veh/h	547	1081	482	548	974	116	614	1049	468	279	1354	76
Arrive On Green	0.16	0.30	0.30	0.16	0.30	0.30	0.17	0.29	0.29	0.15	0.27	0.27
Sat Flow, veh/h	3510	3610	1610	3510	3249	387	3510	3610	1610	1810	5026	281
Grp Volume(v), veh/h	253	926	232	305	391	398	537	874	274	179	513	276
Grp Sat Flow(s),veh/h/ln	1755	1805	1610	1755	1805	1830	1755	1805	1610	1810	1729	1849
Q Serve(g_s), s	5.2	19.3	9.4	6.4	15.5	15.5	11.9	18.1	11.6	7.4	10.2	10.2
Cycle Q Clear(g_c), s	5.2	19.3	9.4	6.4	15.5	15.5	11.9	18.1	11.6	7.4	10.2	10.2
Prop In Lane	1.00		1.00	1.00		0.21	1.00		1.00	1.00		0.15
Lane Grp Cap(c), veh/h	547	1081	482	548	541	549	614	1049	468	279	932	498
V/C Ratio(X)	0.46	0.86	0.48	0.56	0.72	0.72	0.87	0.83	0.59	0.64	0.55	0.55
Avail Cap(c_a), veh/h	549	1083	483	549	542	549	614	1049	468	283	932	498
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	0.26	0.26	0.26	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	30.7	26.4	22.9	31.2	25.0	25.1	32.1	26.6	24.3	31.8	25.1	25.1
Incr Delay (d2), s/veh	0.2	1.9	0.2	1.2	4.7	4.7	13.2	7.8	5.3	4.8	2.3	4.4
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	2.2	8.2	3.5	2.7	7.1	7.2	6.0	8.6	4.9	3.5	4.3	4.9
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	30.9	28.3	23.1	32.4	29.8	29.8	45.4	34.3	29.5	36.6	27.4	29.5
LnGrp LOS	C	C	C	C	C	C	D	C	C	D	C	C
Approach Vol, veh/h		1411			1094			1685			968	
Approach Delay, s/veh		27.9			30.5			37.1			29.7	
Approach LOS		C			C			D			C	

Timer - Assigned Phs	1	2	3	4	5	6	7	8
Phs Duration (G+Y+Rc), s	14.3	25.2	14.5	26.0	16.0	23.6	14.5	26.0
Change Period (Y+Rc), s	4.5	4.5	4.5	4.5	4.5	4.5	4.5	4.5
Max Green Setting (Gmax), s	10.0	20.5	10.0	21.5	11.5	19.0	10.0	21.5
Max Q Clear Time (g_c+I1), s	9.4	20.1	8.4	21.3	13.9	12.2	7.2	17.5
Green Ext Time (p_c), s	0.0	0.3	0.2	0.1	0.0	2.8	0.2	1.8

Intersection Summary	
HCM 6th Ctrl Delay	31.8
HCM 6th LOS	C



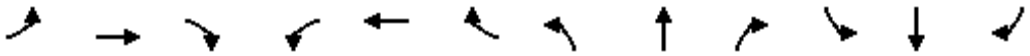
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	400	890	90	120	390	90	90	720	280	150	530	210
Future Volume (veh/h)	400	890	90	120	390	90	90	720	280	150	530	210
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adj Flow Rate, veh/h	421	937	95	126	411	95	95	758	295	158	558	221
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	0	0	0	0	0	0	0	0	0	0	0	0
Cap, veh/h	546	964	98	365	736	169	434	781	304	373	806	318
Arrive On Green	0.19	0.29	0.29	0.15	0.25	0.25	0.14	0.31	0.31	0.15	0.32	0.32
Sat Flow, veh/h	1810	3309	335	1810	2917	668	1810	2539	988	1810	2527	998
Grp Volume(v), veh/h	421	511	521	126	253	253	95	539	514	158	398	381
Grp Sat Flow(s),veh/h/ln	1810	1805	1840	1810	1805	1780	1810	1805	1722	1810	1805	1720
Q Serve(g_s), s	13.0	22.4	22.4	3.6	9.7	9.9	2.4	23.6	23.6	4.0	15.4	15.5
Cycle Q Clear(g_c), s	13.0	22.4	22.4	3.6	9.7	9.9	2.4	23.6	23.6	4.0	15.4	15.5
Prop In Lane	1.00		0.18	1.00		0.38	1.00		0.57	1.00		0.58
Lane Grp Cap(c), veh/h	546	526	536	365	456	449	434	555	530	373	576	549
V/C Ratio(X)	0.77	0.97	0.97	0.34	0.56	0.56	0.22	0.97	0.97	0.42	0.69	0.69
Avail Cap(c_a), veh/h	546	526	536	379	469	463	461	555	530	380	576	549
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	0.51	0.51	0.51	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	16.6	28.0	28.0	17.9	26.0	26.1	14.4	27.3	27.3	16.3	23.8	23.8
Incr Delay (d2), s/veh	3.5	21.5	21.3	0.6	1.4	1.5	0.3	31.5	32.5	0.8	6.7	7.1
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	5.4	12.3	12.5	1.5	4.2	4.2	1.0	14.5	13.9	1.6	7.3	7.1
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	20.1	49.5	49.3	18.5	27.4	27.5	14.6	58.9	59.9	17.1	30.5	30.9
LnGrp LOS	C	D	D	B	C	C	B	E	E	B	C	C
Approach Vol, veh/h		1453			632			1148			937	
Approach Delay, s/veh		40.9			25.7			55.7			28.4	
Approach LOS		D			C			E			C	

Timer - Assigned Phs	1	2	3	4	5	6	7	8
Phs Duration (G+Y+Rc), s	14.2	26.6	13.9	25.3	13.3	27.5	17.0	22.2
Change Period (Y+Rc), s	4.5	4.5	4.5	4.5	4.5	4.5	4.5	4.5
Max Green Setting (Gmax), s	10.0	21.2	10.0	20.8	10.0	21.2	12.5	18.3
Max Q Clear Time (g_c+I1), s	6.0	25.6	5.6	24.4	4.4	17.5	15.0	11.9
Green Ext Time (p_c), s	0.1	0.0	0.1	0.0	0.1	1.7	0.0	1.6

Intersection Summary	
HCM 6th Ctrl Delay	39.8
HCM 6th LOS	D

HCM 6th Signalized Intersection Summary
18: Mountain Avenue & 16th St

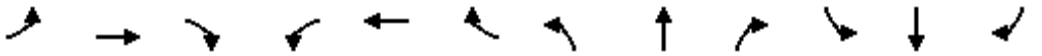
01/20/2020



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	70	304	150	120	625	50	110	530	40	170	1030	80
Future Volume (veh/h)	70	304	150	120	625	50	110	530	40	170	1030	80
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adj Flow Rate, veh/h	74	320	158	126	658	53	116	558	42	179	1084	84
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	0	0	0	0	0	0	0	0	0	0	0	0
Cap, veh/h	239	544	263	269	836	67	266	1249	94	279	1270	98
Arrive On Green	0.13	0.23	0.23	0.15	0.25	0.25	0.15	0.37	0.37	0.15	0.37	0.37
Sat Flow, veh/h	1810	2360	1140	1810	3384	272	1810	3403	256	1810	3395	263
Grp Volume(v), veh/h	74	243	235	126	351	360	116	295	305	179	576	592
Grp Sat Flow(s),veh/h/ln	1810	1805	1695	1810	1805	1851	1810	1805	1854	1810	1805	1853
Q Serve(g_s), s	3.0	9.6	9.9	5.1	14.5	14.6	4.7	9.9	10.0	7.4	23.5	23.5
Cycle Q Clear(g_c), s	3.0	9.6	9.9	5.1	14.5	14.6	4.7	9.9	10.0	7.4	23.5	23.5
Prop In Lane	1.00		0.67	1.00		0.15	1.00		0.14	1.00		0.14
Lane Grp Cap(c), veh/h	239	416	391	269	446	457	266	662	680	279	675	693
V/C Ratio(X)	0.31	0.58	0.60	0.47	0.79	0.79	0.44	0.45	0.45	0.64	0.85	0.85
Avail Cap(c_a), veh/h	285	465	436	285	465	477	285	662	680	348	675	693
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	0.55	0.55	0.55	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	31.4	27.4	27.5	31.2	28.2	28.2	31.1	19.2	19.2	31.8	23.0	23.0
Incr Delay (d2), s/veh	0.7	1.5	1.9	0.7	4.8	4.7	1.1	2.2	2.1	2.7	12.9	12.7
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.3	4.2	4.1	2.2	6.6	6.8	2.1	4.3	4.5	3.4	11.8	12.0
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	32.1	28.9	29.4	31.9	32.9	32.9	32.2	21.3	21.3	34.5	36.0	35.7
LnGrp LOS	C	C	C	C	C	C	C	C	C	C	D	D
Approach Vol, veh/h		552			837			716			1347	
Approach Delay, s/veh		29.5			32.8			23.1			35.7	
Approach LOS		C			C			C			D	

Timer - Assigned Phs	1	2	3	4	5	6	7	8
Phs Duration (G+Y+Rc), s	14.3	31.4	13.9	20.4	13.7	31.9	12.6	21.8
Change Period (Y+Rc), s	4.5	4.5	4.5	4.5	4.5	4.5	4.5	4.5
Max Green Setting (Gmax), s	12.9	20.9	10.1	18.1	10.1	23.7	10.1	18.1
Max Q Clear Time (g_c+I1), s	9.4	12.0	7.1	11.9	6.7	25.5	5.0	16.6
Green Ext Time (p_c), s	0.1	2.4	0.1	1.5	0.1	0.0	0.1	0.7

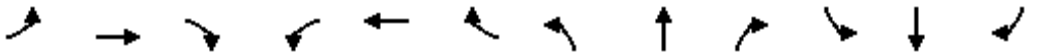
Intersection Summary	
HCM 6th Ctrl Delay	31.4
HCM 6th LOS	C



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	120	444	120	260	715	140	230	550	190	310	1010	150
Future Volume (veh/h)	120	444	120	260	715	140	230	550	190	310	1010	150
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adj Flow Rate, veh/h	126	467	126	274	753	147	242	579	200	326	1063	158
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	0	0	0	0	0	0	0	0	0	0	0	0
Cap, veh/h	522	722	194	548	953	425	546	1196	533	548	1513	225
Arrive On Green	0.15	0.26	0.26	0.16	0.26	0.26	0.16	0.33	0.33	0.16	0.33	0.33
Sat Flow, veh/h	3510	2815	754	3510	3610	1610	3510	3610	1610	3510	4559	677
Grp Volume(v), veh/h	126	298	295	274	753	147	242	579	200	326	806	415
Grp Sat Flow(s),veh/h/ln	1755	1805	1764	1755	1805	1610	1755	1805	1610	1755	1729	1778
Q Serve(g_s), s	2.5	11.8	11.9	5.7	15.5	5.9	5.0	10.2	7.6	6.9	16.2	16.3
Cycle Q Clear(g_c), s	2.5	11.8	11.9	5.7	15.5	5.9	5.0	10.2	7.6	6.9	16.2	16.3
Prop In Lane	1.00		0.43	1.00		1.00	1.00		1.00	1.00		0.38
Lane Grp Cap(c), veh/h	522	463	453	548	953	425	546	1196	533	548	1147	590
V/C Ratio(X)	0.24	0.64	0.65	0.50	0.79	0.35	0.44	0.48	0.37	0.59	0.70	0.70
Avail Cap(c_a), veh/h	549	496	485	549	993	443	549	1196	533	562	1147	590
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	0.41	0.41	0.41	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	30.1	26.5	26.5	30.9	27.4	23.9	30.6	21.3	20.4	31.4	23.3	23.3
Incr Delay (d2), s/veh	0.2	2.6	2.8	0.3	1.8	0.2	0.6	1.4	2.0	1.6	3.6	6.9
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.1	5.2	5.2	2.4	6.6	2.2	2.1	4.4	3.0	3.0	6.9	7.6
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	30.3	29.1	29.3	31.2	29.2	24.1	31.2	22.7	22.4	33.0	26.9	30.2
LnGrp LOS	C	C	C	C	C	C	C	C	C	C	C	C
Approach Vol, veh/h		719			1174			1021			1547	
Approach Delay, s/veh		29.4			29.0			24.7			29.1	
Approach LOS		C			C			C			C	

Timer - Assigned Phs	1	2	3	4	5	6	7	8
Phs Duration (G+Y+Rc), s	14.5	28.5	14.5	22.5	14.5	28.5	13.9	23.1
Change Period (Y+Rc), s	4.5	4.5	4.5	4.5	4.5	4.5	4.5	4.5
Max Green Setting (Gmax), s	10.3	22.2	10.0	19.5	10.0	22.5	10.0	19.5
Max Q Clear Time (g_c+I1), s	8.9	12.2	7.7	13.9	7.0	18.3	4.5	17.5
Green Ext Time (p_c), s	0.2	3.3	0.2	1.8	0.2	2.8	0.2	1.1

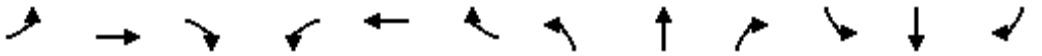
Intersection Summary	
HCM 6th Ctrl Delay	28.1
HCM 6th LOS	C



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	250	544	170	340	845	60	260	660	150	150	1270	150
Future Volume (veh/h)	250	544	170	340	845	60	260	660	150	150	1270	150
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adj Flow Rate, veh/h	263	573	179	358	889	63	274	695	158	158	1337	158
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	0	0	0	0	0	0	0	0	0	0	0	0
Cap, veh/h	547	1001	446	548	949	67	548	1134	506	276	1461	173
Arrive On Green	0.16	0.28	0.28	0.16	0.28	0.28	0.16	0.31	0.31	0.15	0.31	0.31
Sat Flow, veh/h	3510	3610	1610	3510	3419	242	3510	3610	1610	1810	4702	556
Grp Volume(v), veh/h	263	573	179	358	469	483	274	695	158	158	983	512
Grp Sat Flow(s),veh/h/ln	1755	1805	1610	1755	1805	1856	1755	1805	1610	1810	1729	1800
Q Serve(g_s), s	5.5	10.9	7.2	7.7	20.3	20.3	5.7	13.1	6.0	6.5	21.9	21.9
Cycle Q Clear(g_c), s	5.5	10.9	7.2	7.7	20.3	20.3	5.7	13.1	6.0	6.5	21.9	21.9
Prop In Lane	1.00		1.00	1.00		0.13	1.00		1.00	1.00		0.31
Lane Grp Cap(c), veh/h	547	1001	446	548	501	515	548	1134	506	276	1074	559
V/C Ratio(X)	0.48	0.57	0.40	0.65	0.94	0.94	0.50	0.61	0.31	0.57	0.92	0.92
Avail Cap(c_a), veh/h	549	1001	446	606	501	515	549	1134	506	285	1074	559
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	0.81	0.81	0.81	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	30.8	24.8	23.5	31.7	28.2	28.2	30.9	23.3	20.9	31.5	26.6	26.6
Incr Delay (d2), s/veh	0.5	0.6	0.5	2.2	25.4	24.9	0.7	2.5	1.6	2.6	13.4	22.0
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	2.3	4.6	2.7	3.3	11.9	12.1	2.4	5.7	2.4	3.0	10.5	12.3
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	31.3	25.5	24.0	33.9	53.6	53.1	31.6	25.8	22.5	34.1	40.0	48.6
LnGrp LOS	C	C	C	C	D	D	C	C	C	C	D	D
Approach Vol, veh/h		1015			1310			1127			1653	
Approach Delay, s/veh		26.7			48.1			26.7			42.1	
Approach LOS		C			D			C			D	

Timer - Assigned Phs	1	2	3	4	5	6	7	8
Phs Duration (G+Y+Rc), s	14.2	27.1	14.5	24.2	14.5	26.9	14.5	24.2
Change Period (Y+Rc), s	4.5	4.5	4.5	4.5	4.5	4.5	4.5	4.5
Max Green Setting (Gmax), s	10.1	22.2	11.3	18.4	10.0	22.3	10.0	19.7
Max Q Clear Time (g_c+I1), s	8.5	15.1	9.7	12.9	7.7	23.9	7.5	22.3
Green Ext Time (p_c), s	0.1	3.0	0.2	2.1	0.2	0.0	0.2	0.0

Intersection Summary	
HCM 6th Ctrl Delay	37.2
HCM 6th LOS	D



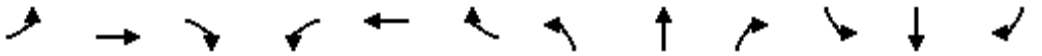
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	250	414	100	240	655	70	60	460	170	80	630	300
Future Volume (veh/h)	250	414	100	240	655	70	60	460	170	80	630	300
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adj Flow Rate, veh/h	263	436	105	253	689	74	63	484	179	84	663	316
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	0	0	0	0	0	0	0	0	0	0	0	0
Cap, veh/h	415	742	177	480	844	91	384	906	333	494	858	409
Arrive On Green	0.16	0.26	0.26	0.16	0.26	0.26	0.13	0.35	0.35	0.14	0.36	0.36
Sat Flow, veh/h	1810	2890	690	1810	3289	353	1810	2584	950	1810	2371	1130
Grp Volume(v), veh/h	263	271	270	253	378	385	63	337	326	84	505	474
Grp Sat Flow(s),veh/h/ln	1810	1805	1776	1810	1805	1836	1810	1805	1729	1810	1805	1697
Q Serve(g_s), s	8.0	10.5	10.7	7.6	15.7	15.8	1.5	11.9	12.1	2.0	19.8	19.8
Cycle Q Clear(g_c), s	8.0	10.5	10.7	7.6	15.7	15.8	1.5	11.9	12.1	2.0	19.8	19.8
Prop In Lane	1.00		0.39	1.00		0.19	1.00		0.55	1.00		0.67
Lane Grp Cap(c), veh/h	415	464	456	480	463	472	384	632	606	494	653	614
V/C Ratio(X)	0.63	0.58	0.59	0.53	0.82	0.82	0.16	0.53	0.54	0.17	0.77	0.77
Avail Cap(c_a), veh/h	418	469	462	484	469	477	442	632	606	532	653	614
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	0.84	0.84	0.84	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	18.4	26.0	26.1	17.0	27.9	28.0	13.9	20.8	20.8	11.7	22.6	22.6
Incr Delay (d2), s/veh	2.6	1.5	1.7	1.0	10.6	10.5	0.2	3.2	3.4	0.2	8.6	9.1
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	3.4	4.5	4.6	3.1	7.9	8.0	0.6	5.3	5.2	0.7	9.5	9.0
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	21.0	27.5	27.7	18.1	38.5	38.5	14.1	24.0	24.2	11.9	31.2	31.7
LnGrp LOS	C	C	C	B	D	D	B	C	C	B	C	C
Approach Vol, veh/h		804			1016			726			1063	
Approach Delay, s/veh		25.5			33.4			23.2			29.9	
Approach LOS		C			C			C			C	

Timer - Assigned Phs	1	2	3	4	5	6	7	8
Phs Duration (G+Y+Rc), s	13.0	30.0	14.5	22.5	12.0	31.0	14.5	22.5
Change Period (Y+Rc), s	4.5	4.5	4.5	4.5	4.5	4.5	4.5	4.5
Max Green Setting (Gmax), s	10.1	23.5	10.1	18.3	10.1	23.5	10.1	18.3
Max Q Clear Time (g_c+I1), s	4.0	14.1	9.6	12.7	3.5	21.8	10.0	17.8
Green Ext Time (p_c), s	0.1	2.9	0.0	1.6	0.1	1.0	0.0	0.3

Intersection Summary	
HCM 6th Ctrl Delay	28.6
HCM 6th LOS	C

HCM 6th Signalized Intersection Summary
18: Mountain Avenue & 16th St

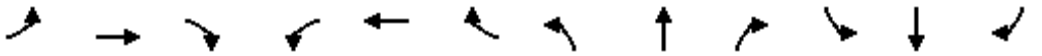
01/20/2020



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	170	667	140	80	362	50	180	990	130	140	740	100
Future Volume (veh/h)	170	667	140	80	362	50	180	990	130	140	740	100
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adj Flow Rate, veh/h	179	702	147	84	381	53	189	1042	137	147	779	105
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	0	0	0	0	0	0	0	0	0	0	0	0
Cap, veh/h	279	765	160	248	766	106	279	1136	149	274	1123	151
Arrive On Green	0.15	0.26	0.26	0.14	0.24	0.24	0.15	0.35	0.35	0.15	0.35	0.35
Sat Flow, veh/h	1810	2971	622	1810	3186	440	1810	3208	421	1810	3197	431
Grp Volume(v), veh/h	179	426	423	84	215	219	189	586	593	147	440	444
Grp Sat Flow(s),veh/h/ln	1810	1805	1788	1810	1805	1821	1810	1805	1824	1810	1805	1822
Q Serve(g_s), s	7.4	18.4	18.4	3.4	8.2	8.3	7.9	24.8	24.9	6.0	16.7	16.7
Cycle Q Clear(g_c), s	7.4	18.4	18.4	3.4	8.2	8.3	7.9	24.8	24.9	6.0	16.7	16.7
Prop In Lane	1.00		0.35	1.00		0.24	1.00		0.23	1.00		0.24
Lane Grp Cap(c), veh/h	279	465	460	248	434	438	279	639	646	274	634	640
V/C Ratio(X)	0.64	0.92	0.92	0.34	0.49	0.50	0.68	0.92	0.92	0.54	0.69	0.69
Avail Cap(c_a), veh/h	285	465	460	283	463	467	285	639	646	285	634	640
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	0.81	0.81	0.81	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	31.8	28.9	28.9	31.2	26.2	26.2	31.9	24.7	24.7	31.3	22.3	22.3
Incr Delay (d2), s/veh	4.7	23.1	23.4	0.7	0.7	0.7	6.1	20.1	20.2	1.8	6.2	6.1
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	3.5	10.6	10.5	1.5	3.5	3.6	3.8	13.5	13.7	2.7	7.8	7.9
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	36.5	51.9	52.2	31.9	26.9	27.0	38.0	44.9	44.9	33.2	28.4	28.4
LnGrp LOS	D	D	D	C	C	C	D	D	D	C	C	C
Approach Vol, veh/h		1028			518			1368			1031	
Approach Delay, s/veh		49.4			27.7			43.9			29.1	
Approach LOS		D			C			D			C	

Timer - Assigned Phs	1	2	3	4	5	6	7	8
Phs Duration (G+Y+Rc), s	14.1	30.3	13.0	22.6	14.4	30.1	14.3	21.2
Change Period (Y+Rc), s	4.5	4.5	4.5	4.5	4.5	4.5	4.5	4.5
Max Green Setting (Gmax), s	10.1	23.8	10.0	18.1	10.1	23.8	10.1	18.0
Max Q Clear Time (g_c+I1), s	8.0	26.9	5.4	20.4	9.9	18.7	9.4	10.3
Green Ext Time (p_c), s	0.1	0.0	0.1	0.0	0.0	2.5	0.0	1.5

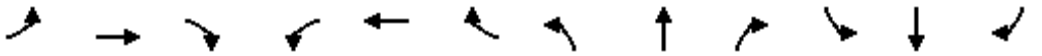
Intersection Summary	
HCM 6th Ctrl Delay	39.3
HCM 6th LOS	D



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	370	987	150	430	742	180	280	1060	240	260	740	140
Future Volume (veh/h)	370	987	150	430	742	180	280	1060	240	260	740	140
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adj Flow Rate, veh/h	389	1039	158	453	781	189	295	1116	253	274	779	147
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	0	0	0	0	0	0	0	0	0	0	0	0
Cap, veh/h	549	903	137	549	1038	463	548	1084	484	548	1317	247
Arrive On Green	0.16	0.29	0.29	0.16	0.29	0.29	0.16	0.30	0.30	0.16	0.30	0.30
Sat Flow, veh/h	3510	3142	477	3510	3610	1610	3510	3610	1610	3510	4389	821
Grp Volume(v), veh/h	389	596	601	453	781	189	295	1116	253	274	612	314
Grp Sat Flow(s),veh/h/ln	1755	1805	1814	1755	1805	1610	1755	1805	1610	1755	1729	1752
Q Serve(g_s), s	8.4	23.0	23.0	10.0	15.7	7.6	6.2	24.0	10.4	5.7	12.0	12.2
Cycle Q Clear(g_c), s	8.4	23.0	23.0	10.0	15.7	7.6	6.2	24.0	10.4	5.7	12.0	12.2
Prop In Lane	1.00		0.26	1.00		1.00	1.00		1.00	1.00		0.47
Lane Grp Cap(c), veh/h	549	519	522	549	1038	463	548	1084	484	548	1038	526
V/C Ratio(X)	0.71	1.15	1.15	0.83	0.75	0.41	0.54	1.03	0.52	0.50	0.59	0.60
Avail Cap(c_a), veh/h	549	519	522	549	1038	463	549	1084	484	549	1038	526
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	0.48	0.48	0.48	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	32.0	28.5	28.5	32.7	25.9	23.0	31.1	28.0	23.2	30.9	23.8	23.9
Incr Delay (d2), s/veh	4.2	87.5	88.5	5.1	1.5	0.3	1.0	35.2	4.0	0.7	2.5	4.9
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	3.8	22.0	22.3	4.5	6.7	2.8	2.6	15.1	4.3	2.4	5.1	5.6
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	36.2	116.0	117.0	37.8	27.4	23.3	32.2	63.1	27.2	31.6	26.3	28.8
LnGrp LOS	D	F	F	D	C	C	C	F	C	C	C	C
Approach Vol, veh/h		1586			1423			1664			1200	
Approach Delay, s/veh		96.8			30.2			52.2			28.1	
Approach LOS		F			C			D			C	

Timer - Assigned Phs	1	2	3	4	5	6	7	8
Phs Duration (G+Y+Rc), s	14.5	26.0	14.5	25.0	14.5	26.0	14.5	25.0
Change Period (Y+Rc), s	4.5	4.5	4.5	4.5	4.5	4.5	4.5	4.5
Max Green Setting (Gmax), s	10.0	21.5	10.0	20.5	10.0	21.5	10.0	20.5
Max Q Clear Time (g_c+I1), s	7.7	26.0	12.0	25.0	8.2	14.2	10.4	17.7
Green Ext Time (p_c), s	0.2	0.0	0.0	0.0	0.2	3.5	0.0	1.6

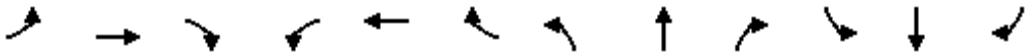
Intersection Summary			
HCM 6th Ctrl Delay		54.0	
HCM 6th LOS		D	



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	240	897	220	290	702	80	510	830	260	170	710	40
Future Volume (veh/h)	240	897	220	290	702	80	510	830	260	170	710	40
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adj Flow Rate, veh/h	253	944	232	305	739	84	537	874	274	179	747	42
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	0	0	0	0	0	0	0	0	0	0	0	0
Cap, veh/h	547	1083	483	548	981	111	614	1047	467	279	1351	76
Arrive On Green	0.16	0.30	0.30	0.16	0.30	0.30	0.17	0.29	0.29	0.15	0.27	0.27
Sat Flow, veh/h	3510	3610	1610	3510	3267	371	3510	3610	1610	1810	5026	281
Grp Volume(v), veh/h	253	944	232	305	408	415	537	874	274	179	513	276
Grp Sat Flow(s),veh/h/ln	1755	1805	1610	1755	1805	1833	1755	1805	1610	1810	1729	1849
Q Serve(g_s), s	5.2	19.8	9.4	6.4	16.4	16.4	11.9	18.1	11.6	7.4	10.2	10.3
Cycle Q Clear(g_c), s	5.2	19.8	9.4	6.4	16.4	16.4	11.9	18.1	11.6	7.4	10.2	10.3
Prop In Lane	1.00		1.00	1.00		0.20	1.00		1.00	1.00		0.15
Lane Grp Cap(c), veh/h	547	1083	483	548	542	551	614	1047	467	279	930	497
V/C Ratio(X)	0.46	0.87	0.48	0.56	0.75	0.75	0.87	0.83	0.59	0.64	0.55	0.55
Avail Cap(c_a), veh/h	549	1083	483	549	542	551	614	1047	467	283	930	497
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	0.23	0.23	0.23	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	30.7	26.5	22.9	31.2	25.3	25.3	32.1	26.6	24.3	31.8	25.1	25.1
Incr Delay (d2), s/veh	0.1	2.0	0.2	1.2	5.9	5.8	13.2	7.9	5.3	4.8	2.4	4.4
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	2.2	8.4	3.5	2.7	7.6	7.7	6.0	8.6	4.9	3.5	4.3	4.9
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	30.9	28.5	23.1	32.4	31.2	31.1	45.4	34.5	29.6	36.6	27.5	29.5
LnGrp LOS	C	C	C	C	C	C	D	C	C	D	C	C
Approach Vol, veh/h		1429			1128			1685			968	
Approach Delay, s/veh		28.1			31.5			37.2			29.7	
Approach LOS		C			C			D			C	

Timer - Assigned Phs	1	2	3	4	5	6	7	8
Phs Duration (G+Y+Rc), s	14.3	25.2	14.5	26.0	16.0	23.5	14.5	26.0
Change Period (Y+Rc), s	4.5	4.5	4.5	4.5	4.5	4.5	4.5	4.5
Max Green Setting (Gmax), s	10.0	20.5	10.0	21.5	11.5	19.0	10.0	21.5
Max Q Clear Time (g_c+I1), s	9.4	20.1	8.4	21.8	13.9	12.3	7.2	18.4
Green Ext Time (p_c), s	0.0	0.2	0.2	0.0	0.0	2.8	0.2	1.5

Intersection Summary	
HCM 6th Ctrl Delay	32.1
HCM 6th LOS	C



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	400	907	90	120	422	90	90	720	280	150	530	210
Future Volume (veh/h)	400	907	90	120	422	90	90	720	280	150	530	210
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adj Flow Rate, veh/h	421	955	95	126	444	95	95	758	295	158	558	221
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	0	0	0	0	0	0	0	0	0	0	0	0
Cap, veh/h	534	966	96	361	748	159	434	781	304	373	806	318
Arrive On Green	0.19	0.29	0.29	0.15	0.25	0.25	0.14	0.31	0.31	0.15	0.32	0.32
Sat Flow, veh/h	1810	3316	330	1810	2962	629	1810	2539	988	1810	2527	998
Grp Volume(v), veh/h	421	520	530	126	269	270	95	539	514	158	398	381
Grp Sat Flow(s),veh/h/ln	1810	1805	1841	1810	1805	1787	1810	1805	1722	1810	1805	1720
Q Serve(g_s), s	13.0	22.9	22.9	3.6	10.5	10.6	2.4	23.6	23.6	4.0	15.4	15.5
Cycle Q Clear(g_c), s	13.0	22.9	22.9	3.6	10.5	10.6	2.4	23.6	23.6	4.0	15.4	15.5
Prop In Lane	1.00		0.18	1.00		0.35	1.00		0.57	1.00		0.58
Lane Grp Cap(c), veh/h	534	526	536	361	456	451	434	555	530	373	576	549
V/C Ratio(X)	0.79	0.99	0.99	0.35	0.59	0.60	0.22	0.97	0.97	0.42	0.69	0.69
Avail Cap(c_a), veh/h	534	526	536	375	469	465	461	555	530	380	576	549
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	0.49	0.49	0.49	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	16.8	28.2	28.2	18.0	26.3	26.3	14.4	27.3	27.3	16.3	23.8	23.8
Incr Delay (d2), s/veh	3.9	24.7	24.5	0.6	1.9	2.0	0.3	31.5	32.5	0.8	6.7	7.1
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	5.5	13.0	13.2	1.5	4.6	4.6	1.0	14.5	13.9	1.6	7.3	7.1
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	20.7	52.9	52.7	18.5	28.2	28.3	14.6	58.9	59.9	17.1	30.5	30.9
LnGrp LOS	C	D	D	B	C	C	B	E	E	B	C	C
Approach Vol, veh/h		1471			665			1148			937	
Approach Delay, s/veh		43.6			26.4			55.7			28.4	
Approach LOS		D			C			E			C	

Timer - Assigned Phs	1	2	3	4	5	6	7	8
Phs Duration (G+Y+Rc), s	14.2	26.6	13.9	25.3	13.3	27.5	17.0	22.2
Change Period (Y+Rc), s	4.5	4.5	4.5	4.5	4.5	4.5	4.5	4.5
Max Green Setting (Gmax), s	10.0	21.2	10.0	20.8	10.0	21.2	12.5	18.3
Max Q Clear Time (g_c+I1), s	6.0	25.6	5.6	24.9	4.4	17.5	15.0	12.6
Green Ext Time (p_c), s	0.1	0.0	0.1	0.0	0.1	1.7	0.0	1.6

Intersection Summary	
HCM 6th Ctrl Delay	40.8
HCM 6th LOS	D

Attachment 5

Supplemental Project Field Survey (including peer review by Rocks Biological Consulting)

ROCKS
BIOLOGICAL CONSULTING

MEMORANDUM

To: Ms. Karina Fidler, Kimley-Horn

From: Jim Rocks, Rocks Biological Consulting

Date: January 27, 2020

Subject: City of Upland Bridge Project Field Survey Results

This memo summarizes the field survey Rocks Biological Consulting (RBC) conducted at the Bridge Project (project) in the City of Upland, San Bernardino County, California on January 22, 2020. The approximately 50.25-acre project site is located north of Foothill Boulevard, west of Benson Avenue, east of Central Avenue and south of Cable Airport.

RBC biologist Ian Hirschler traversed the project site on-foot to document the general biological conditions and potential habitat for special-status species. Mr. Hirschler did not conduct focused surveys for special-status plant or wildlife species or a formal jurisdictional delineation for aquatic resources such as wetlands or other Waters of the U.S/State.

The project site consists of two vegetation communities: disturbed habitat and disturbed scale broom scrub. The disturbed habitat on site has been previously graded and an active rock-crusher was observed in the northwest portion of the project site. This habitat consists of non-native annual grasses and other herbaceous weedy species.

Disturbed scale broom scrub is present in the eastern half of the project site. This habitat consists of scattered individuals of scale broom (*Lepidospartum squamatum*), California sagebrush (*Artemisia californica*), California buckwheat (*Eriogonum fasciculatum*), laurel-sumac (*Malosma laurina*), and deerweed (*Acmispon glaber*). The scale broom scrub is highly disturbed by debris piles, off-road vehicle use, and homeless encampments and is further degraded by non-native invasive plant species such as filaree (*Erodium* sp.), tumbleweed (*Salsola tragus*), and castor bean (*Ricinus communis*).

The California Department of Fish and Wildlife (CDFW) California Natural Community List (2019) designates scale broom scrub vegetation communities as sensitive natural communities. Scale broom scrub habitats have a state ranking of S3. Vegetation communities with this ranking are considered vulnerable, with a moderate risk of extinction due to restricted range, relatively few populations, and recent and widespread declines globally and statewide. Natural Communities with ranks of S1-S3 are considered Sensitive Natural Communities to be addressed in the environmental review processes of the California

Environmental Quality Act (CEQA) (CDFW 2019). Due to its status as a sensitive natural community, impacts on the disturbed scale broom scrub onsite may require mitigation. Due to the highly disturbed condition of the scale broom scrub mitigation requirements may be less than those proposed for impacts on high quality, undisturbed scale broom scrub.

Suitable habitat for burrowing owl (*Athene cunicularia*), a CDFW Species of Special Concern, is present on the project site. Ground burrows of sufficient size for burrowing owl were observed in open scrub habitat and California ground squirrels (*Otospermophilus beecheyi*) were documented onsite. The numerous debris piles (see photo) also provide suitable refuge for burrowing owl. RBC recommends that two pre-construction surveys for burrowing owl, one 14 days and one 24 hours prior to construction activities, be conducted in accordance with the guidelines outlined in the CDFW *Staff Report on Burrowing Owl Mitigation* (2012). If documented on site, a burrowing owl exclusion plan may be required in coordination with CDFW.

There is no potential for federally or state-listed as threatened or endangered plant or wildlife species to occur on the project site. No jurisdictional aquatic resources were observed during the field survey. Based on the lack of these resources on the project site, no permits from the U.S. Fish and Wildlife Service, CDFW, and/or U.S. Army Corps of Engineers would be required.

Photographs documenting general site conditions are presented in Attachment A below.

References

California Department of Fish and Wildlife. 2012. *Staff Report on Burrowing Owl Mitigation*.
California Department of Fish and Wildlfie. 2019. California Natural Community List.

Attachment A

Site Photographs – January 22, 2020

Photo 1: View of the disturbed western portion of the project site, facing north. Active rock crushing shown in background.

Photo 2: View of scale broom scrub on the eastern portion of the project site.

Photo 3: View of the scale broom scrub on the eastern portion of the project site.

Photo 4: View of scale broom scrub with rock crushing in the background.

Photo 5: View of suitable burrowing owl burrows within scale broom scrub.

Photo 6: View of debris piles on-site. Debris piles provide suitable refuge for burrowing owls.

Attachment 6

Updated Hydrology Report

PRELIMINARY HYDROLOGY CALCULATIONS

FOR

BRIDGE UPLAND
NORTHEAST CORNER OF FOOTHILL BLVD.
AND CENTRAL AVENUE
UPLAND, CALIFORNIA
PREPARED FOR

BRIDGE DEVELOPMENT PARTNERS
1334 PARKWAY AVENUE, SUITE 310
MANHATTAN BEACH, CALIFORNIA 90266
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MAY 7, 2018
REVISED APRIL 3, 2019
REVISED JULY 22, 2019
REVISED SEPTEMBER 27, 2019
REVISED NOVEMBER 13, 2019
REVISED NOVEMBER 22, 2019
REVISED JANUARY 21, 2020
REVISED JANARUY 24, 2020

JOB NO. 3651

PREPARED BY

THIENES ENGINEERING
14349 FIRESTONE BLVD.
LA MIRADA, CALIFORNIA 90638
P. (714) 521-4811
FAX (714) 521-4173

PRELIMINARY HYDROLOGY CALCULATIONS

FOR

BRIDGE UPLAND

PREPARED UNDER
THE SUPERVISION OF

1/24/2020

REINHARD STENZEL DATE:
R.C.E. 56155
EXP. 12/31/2020

INTRODUCTION

A: PROJECT LOCATION

The project site is located north of Foothill Boulevard between the prolongation of Central Avenue at the west and Benson Avenue to the east in the City of Upland. Cable Airport is adjacent to the site to the north. See following page for vicinity map.

B: STUDY PURPOSE

The purpose of this study is to determine the existing and proposed condition 100-year peak flow rate from the site that ultimately drains to an existing storm drain system in Foothill Boulevard.

C: PROJECT STAFF:

Thienes Engineering staff involved in this study include:

Reinhard Stenzel, PE
James Wickenhaeuser

Last Update: 11/21/19
O:\3600-3699\3651\3651VicMap.dwg

Thienes Engineering, Inc.
CIVIL ENGINEERING • LAND SURVEYING
14349 FIRESTONE BOULEVARD
LA MIRADA, CALIFORNIA 90638
PH.(714)521-4811 FAX(714)521-4173

VICINITY MAP

FOR

BRIDGE UPLAND

DISCUSSION

The proposed commercial site encompasses approximately 50.25 acres. Improvements to the site include one warehouse type building. The building is approximately 201,096 square feet. The building has two truck yard areas as well as vehicle parking. Landscaping is located throughout the project site.

County/City Hydrology

San Bernardino County Flood Control District's Comprehensive Storm Drain Plan Project No. 1-7, dated July 1966, appears to have tabled the easterly half of the project site (Area B9) to a storm drain system in Benson Avenue. The westerly half of the project site (southerly portion of Area 7A) appears to be tabled to a future storm drain system in Central Avenue. This study also shows a portion of the airport to the north (northerly portion of Area 7A) draining to the project site. The provided drainage maps to not indicate peak flow rates.

The West Upland Master Storm Drain Plan appears to have updated the older Comprehensive Storm Drain Plan. Exhibit "A" – Hydrology Map, dated June 2001, provided by the City shows the majority of the project site (Areas B6, B7, B10, B11 and B12) tabled westerly in Foothill Boulevard to detention areas located south of Foothill Boulevard and east of San Antonio Channel. This exhibit does not indicate peak flow rates.

See Appendix "A" for reference County and City hydrology plans.

Existing Storm Drain Facilities

There is an existing storm drain system in Benson Avenue. The upstream portion of this storm drain is at the intersection of Benson Avenue and 13th Street (east) and Cable Airport Drive (west). The drain continues southerly in Benson Avenue to Arrow Highway. Here, the drain continues westerly in Arrow Highway ultimately to Arrow Highway Basin located between Arrow Highway and Huntington Drive east of San Antonio Creek Channel. Hydrology for this storm drain system was not available from the City. It does not appear that a significant portion of the project site is tabled to the Benson Avenue storm drain system.

There is a 42" lateral to the Benson Avenue storm drain at the northerly side of Foothill Boulevard. However, this drain appears to serve the existing Lowe's site and other commercial sites located to the east of the project site.

There is an existing storm drain in 11th Street located south of Foothill Boulevard. This drain intercepts runoff from the upstream portion of the Benson Avenue storm drain, thus providing relief to downstream portions. The storm drain continues westerly to Dewey Way. While this storm drain shows an increase in peak flow rate at Central Avenue, it does not appear that this drain was intended for flows tabled to Central Avenue from Comprehensive Storm Drain Plan Project No. 1-7.

There is an existing storm drain system in Dewey Way. This storm drain traverses southerly from Foothill Boulevard to an existing Arrow Highway basin located south of Arrow Highway. Dewey Way is approximately 1250' west of the project site. The plans show a 72" lateral in Foothill Boulevard that extends about 400' easterly. The hydrology study or drainage maps to this storm drain were not available from the City. However, based on the Master Plan and peak flow rates shown on the plan it appears that the project site is tabled to the 72" Foothill lateral.

Finally, the Cable Airport to the north appears to have an onsite drainage system. The majority of runoff from the airport is conveyed westerly to a storm drain system that continues southerly and connected to the previously mentioned Dewey Way storm drain system. It does not appear that the Airport drains directly to the project site.

See Appendix "A" for reference storm drain facilities.

Existing Condition Hydrology

The project site is currently an undeveloped dirt lot with native vegetation. There are several stockpiles of dirt/rocks on the westerly portion of the project site. There are several existing commercial developments and open areas south of the project site.

Foothill Boulevard has a high point roughly midway between the east and west boundaries of the site. Runoff from approximately half of the site ultimately drains easterly towards Benson Avenue with the other half draining westerly towards Central Avenue.

Runoff from the site generally drains from north to south towards Foothill Boulevard. While there are several large stockpiles of dirt on the site. It is assumed that runoff generally goes around these stockpiles and therefore elevations in the rational method model assume the stockpiles are just part of the overall area that is considered as barren.

The easterly portion of the site (nodes 100-102 and 200-202 on the existing condition hydrology map) ultimately drains to Foothill Boulevard through the adjacent properties and open spaces to the south. These areas then appear to drain easterly in Foothill Boulevard. The 100-year peak flow rate for these area is approximately 21.2 cfs and 23.6 cfs, respectively.

The stockpiles and areas adjacent (nodes 300-303 and 400-402) drain from north to south ultimately to Foothill Boulevard. It appears these flows continue westerly in the street. The respective 100-year peak flow rates are approximately 53.6 cfs and 47.6 cfs. Adding up the individual existing condition peak flow rates yields a total 100-year peak flow rate of 146.0 cfs.

See Appendix "B" for existing condition hydrology calculations.

Proposed Condition

Runoff from the easterly parking lot (nodes 100-104 on proposed condition hydrology map) will generally drain from north to south to catch basins located in the parking areas. A proposed storm drain, Line "B", will convey runoff southerly through the drive aisle. This flow will combine with the runoff from the southeasterly parking area (nodes 110-112) at node 113. These flows continue westerly in Line "A" through the southerly parking lot.

Flow from the southerly half of the proposed building and the southerly truck yard area (nodes 120-121) will be intercepted in catch basin located in the truck yard area. A storm drain conveys runoff southerly to confluence with Line "A" (at node 122). Continuing westerly, a portion of the southerly parking area is then added to the Line "A" storm drain system (at node 123). Line "A" continues westerly, ultimately connecting to Line "C" (at node 303).

Runoff from the northerly parking area, the northerly half of the proposed building and the northerly truck yard area (nodes 200-202) drain to catch basins located in the truck yard area. A proposed storm drain, Line "C", conveys runoff westerly around the proposed building. Parking areas immediately west of the building (nodes 203-204) are also tributary to Line "C". Line "C" continues westerly then southerly at the westerly drive aisle. The northwesterly parking area (nodes 300-301) is conveyed to Line "C" at this location (at node 302).

Line "C" continues southerly and confluences with Line "A" in the westerly drive aisle. The westerly drive aisle, the southwesterly parking area and a portion of the southerly landscaped area is added to this storm drain system (at nodes 304 and 305).

The total 100-year peak flow rate for this portion of the project site (nodes 100-305, 47.55 ac) is approximately 173.7 cfs.

The private storm drain system will connect to the proposed extension of the Foothill storm drain system at the Central Avenue cul-de-sac. This storm drain continues westerly in Foothill Boulevard, ultimately connecting to the existing 72" existing storm drain approximately 250' west of the project site.

The existing downstream storm drain plan indicates a 100-year peak flow rate of 288.4 cfs. The existing commercial development at the northeast corner of Dewey Way and Foothill Boulevard does not use this drain. It appears that the 72" storm drain has the capacity of the proposed development along with remaining areas on Foothill Boulevard.

Flow from the proposed easterly driveways (nodes 400-401, 0.25 ac. and 500-501, 0.70 ac) will sheet flow to Foothill Boulevard. The 100-year peak flow rates for these areas are approximately 1.5 cfs and 4.2 cfs, respectively.

The landscaped areas at the southerly portion of the project site (1.35 ac.) will continue to flow southerly to the existing commercial developments as under existing conditions. The 100-year peak flow rates for this area is approximately 7.6 cfs.

The landscaped areas at the northeastern portion of the project site (0.35 ac.) will continue to flow easterly to the existing commercial development as under existing conditions. The 100-year peak flow rates for this area is approximately 2.0 cfs.

Therefore the total 100-year peak flow rate for the project site (50.25 ac) is approximately 188.9 cfs.

See Appendix "B" for proposed condition hydrology calculations.

Water Quality

Roof and surface runoff will sheet flow into inlets where stormwater will be intercepted and diverted into the perforated CMPs for water quality treatment. This system will utilize infiltration as their primary form of treatment. This system stores stormwater runoff until it gradually exfiltrates into the underlying soil. Pollutant removal occurs through the infiltration of runoff and the adsorption of pollutants into the soil. This practice has high pollutant removal efficiency and can also help recharge groundwater, thus helping to maintain low flows in stream systems.

Methodology

San Bernardino County Rational Method program (by AES Software) was used for the hydrology calculations. The 1-hour rainfall value is 1.55 per the San Bernardino County Hydrology Manual. The soil type is "A". See Appendix "A" for reference material from the Hydrology Manual.

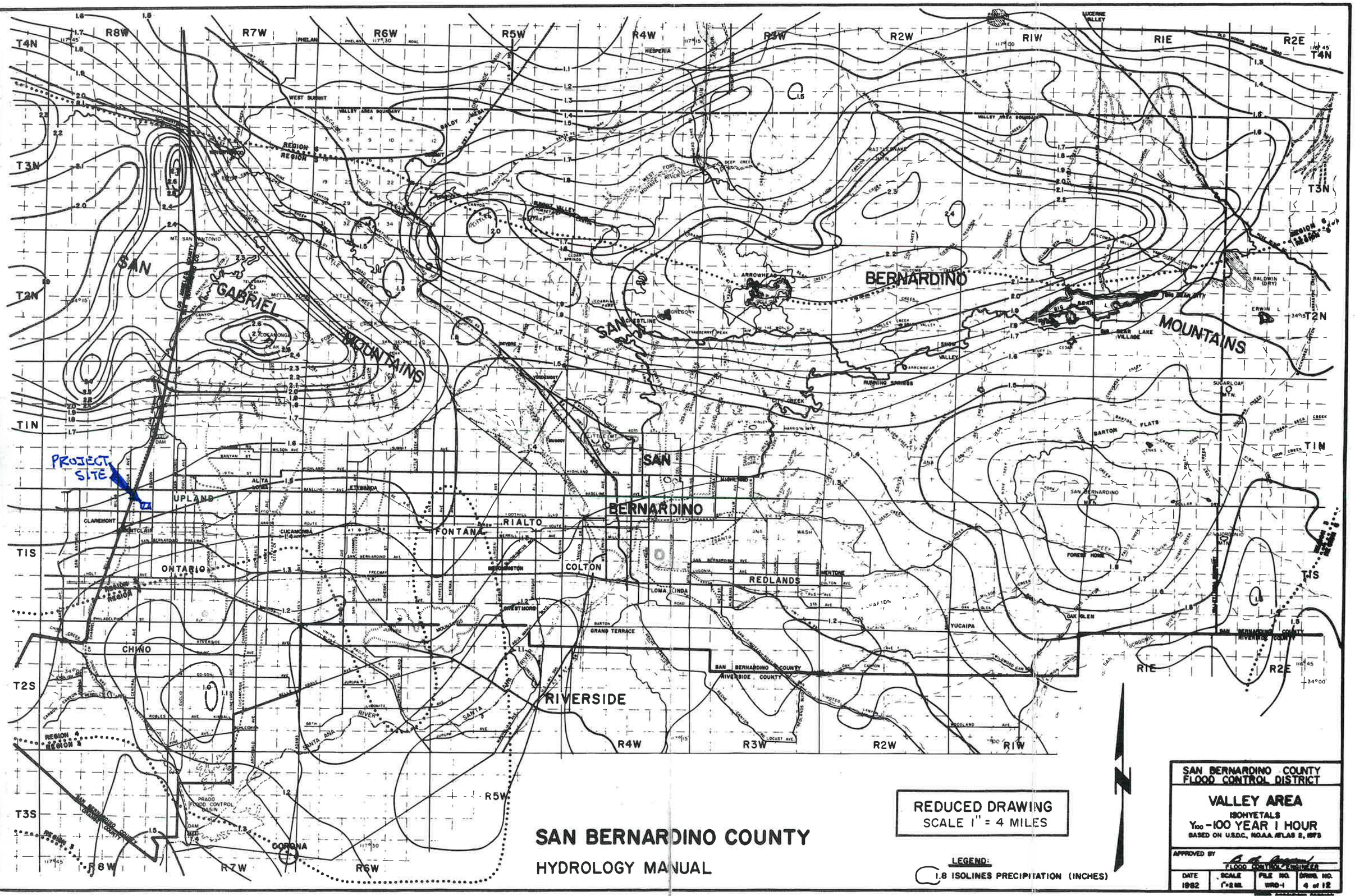
Summary

The total proposed 100-year peak flow from the project site is approximately 188.9 cfs (173.7cfs at the westerly storm drain system + 5.7 cfs at the easterly driveways + 9.6 from the landscape buffers). The existing public storm drain in Foothill Boulevard is designed for a 100-year storm event and indicates a peak flow rate of 288.4 cfs. This leaves approximately 100 cfs for the smaller remaining developments at Foothill Boulevard. Therefore, the proposed project site does not have an adverse effect on existing downstream facilities.

APPENDIX	DESCRIPTION
A	REFERENCE MATERIALS
B	HYDROLOGY CALCULATIONS
C	HYDROLOGY MAP

APPENDIX A

REFERENCE MATERIALS



SAN BERNARDINO COUNTY
HYDROLOGY MANUAL

REDUCED DRAWING
SCALE 1" = 4 MILES

LEGEND:
1.8 ISOLINES PRECIPITATION (INCHES)

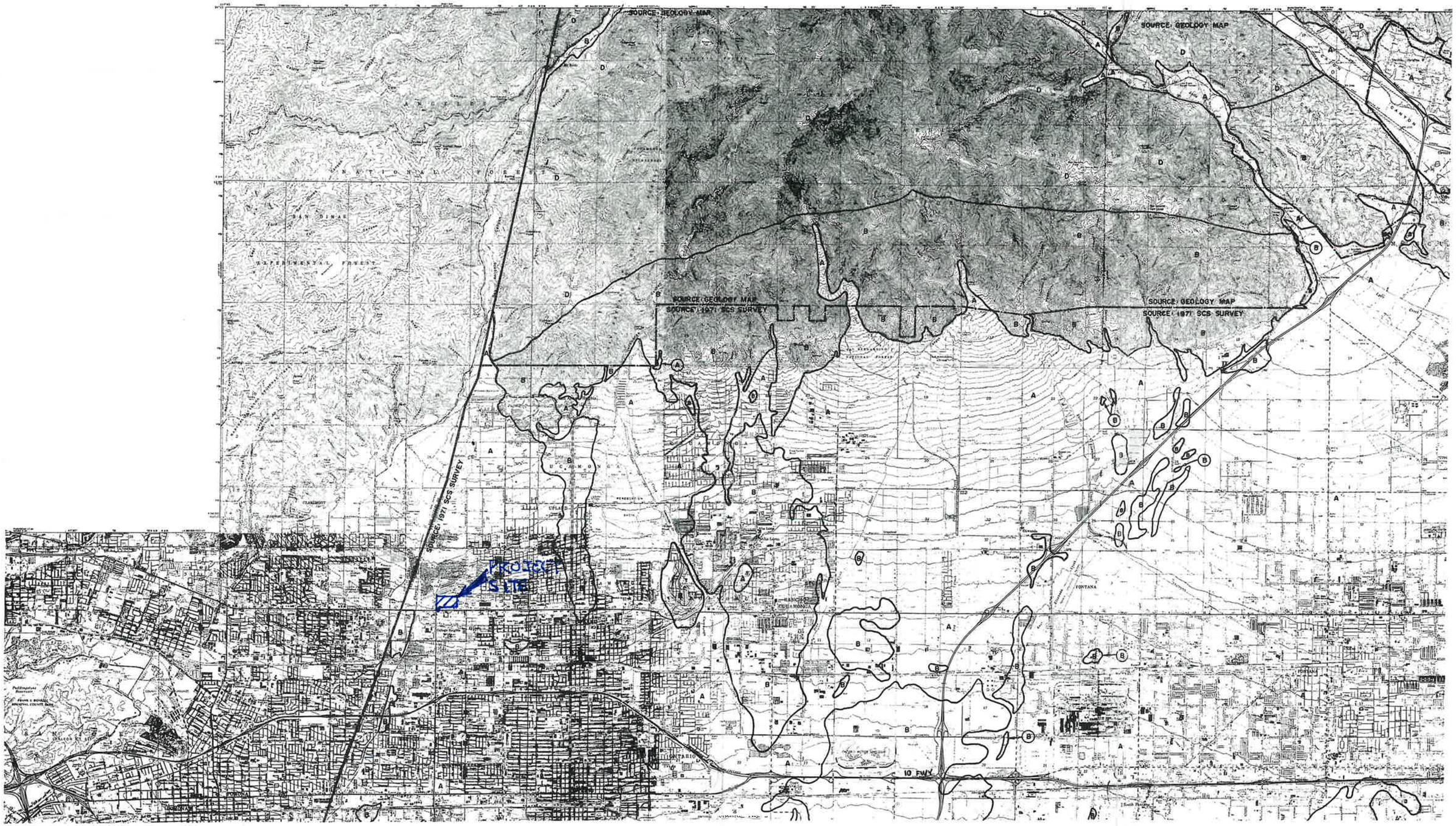
SAN BERNARDINO COUNTY
FLOOD CONTROL DISTRICT

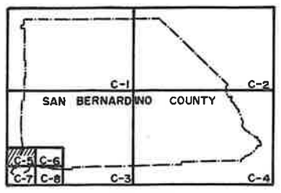
VALLEY AREA
ISOHYETALS
Y_{100} - 100 YEAR 1 HOUR
BASED ON U.S.D.C., N.O.A.A. ATLAS 2, 1973

APPROVED BY _____ FLOOD CONTROL ENGINEER

DATE	SCALE	FILE NO.	DRWG. NO.
1982	1"=2 MI.	WRD-1	4 of 12

FIGURE B-4





INDEX MAP

LEGEND
SOIL GROUP BOUNDARY
A SOIL GROUP DESIGNATION
BOUNDARY OF INDICATED SOURCE

SCALE 1:48,000

SCALE REDUCED BY 1/2

SAN BERNARDINO COUNTY
HYDROLOGY MANUAL

HYDROLOGIC SOILS GROUP MAP
FOR
SOUTHWEST-A AREA

FIGURE C-13

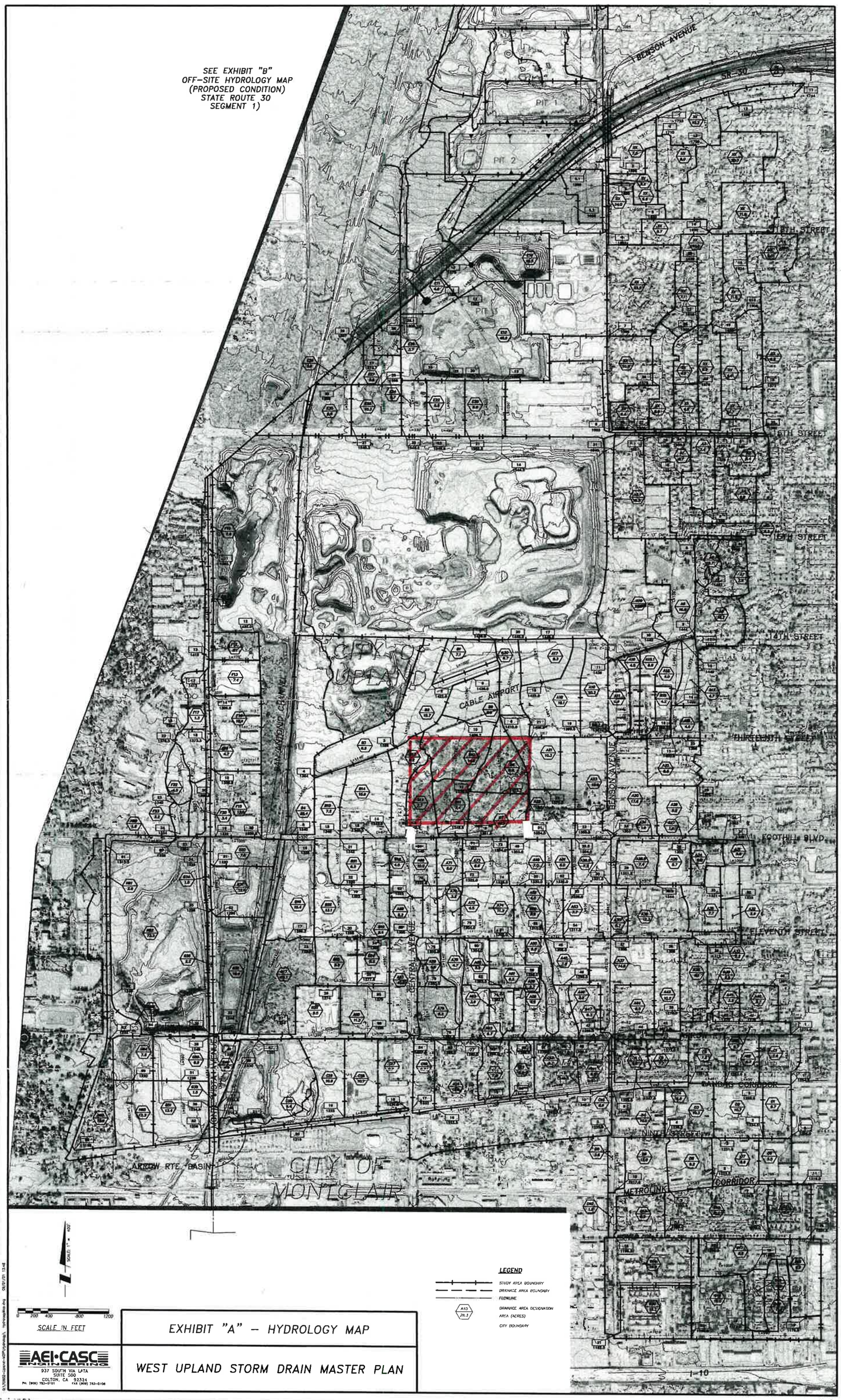
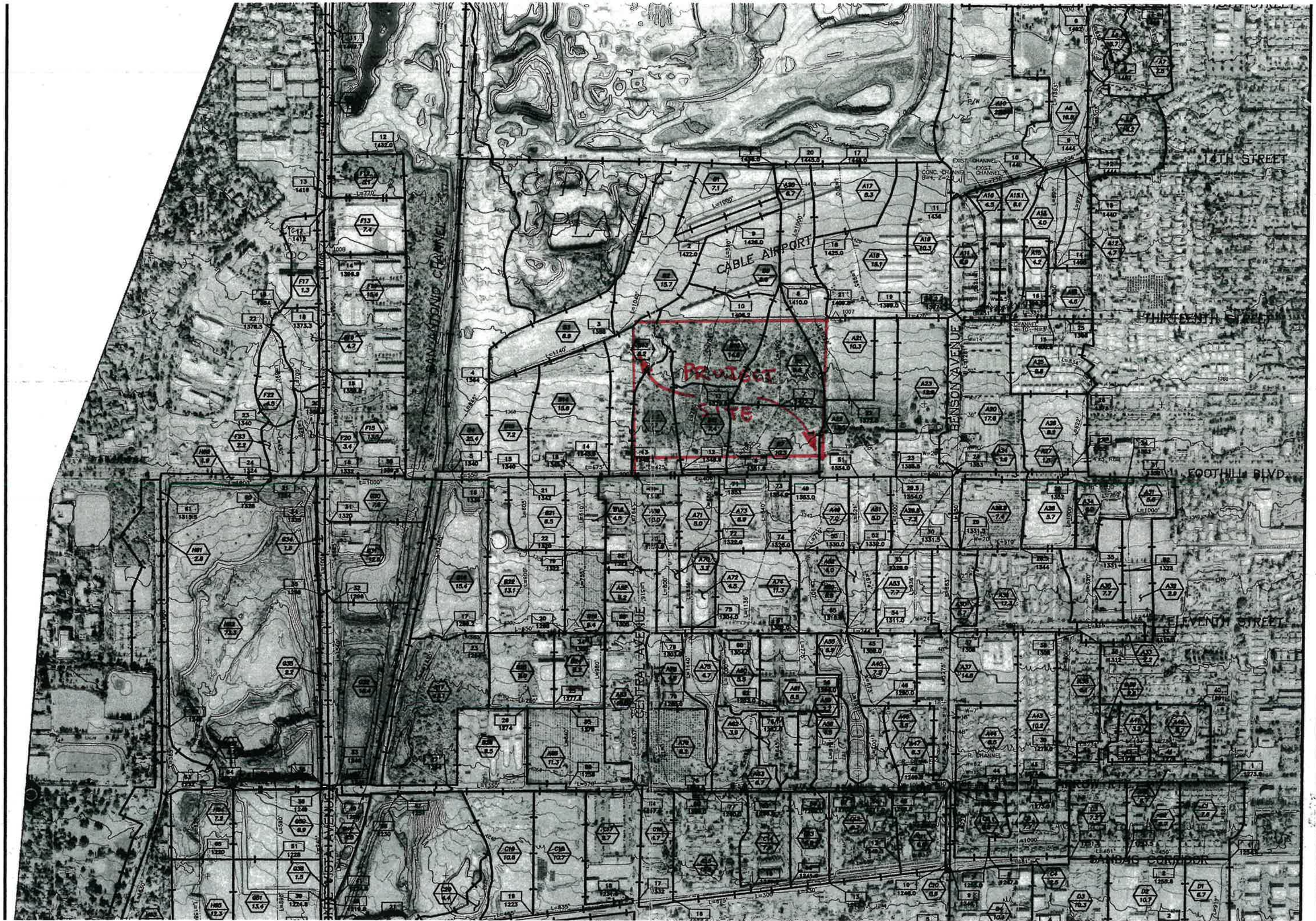


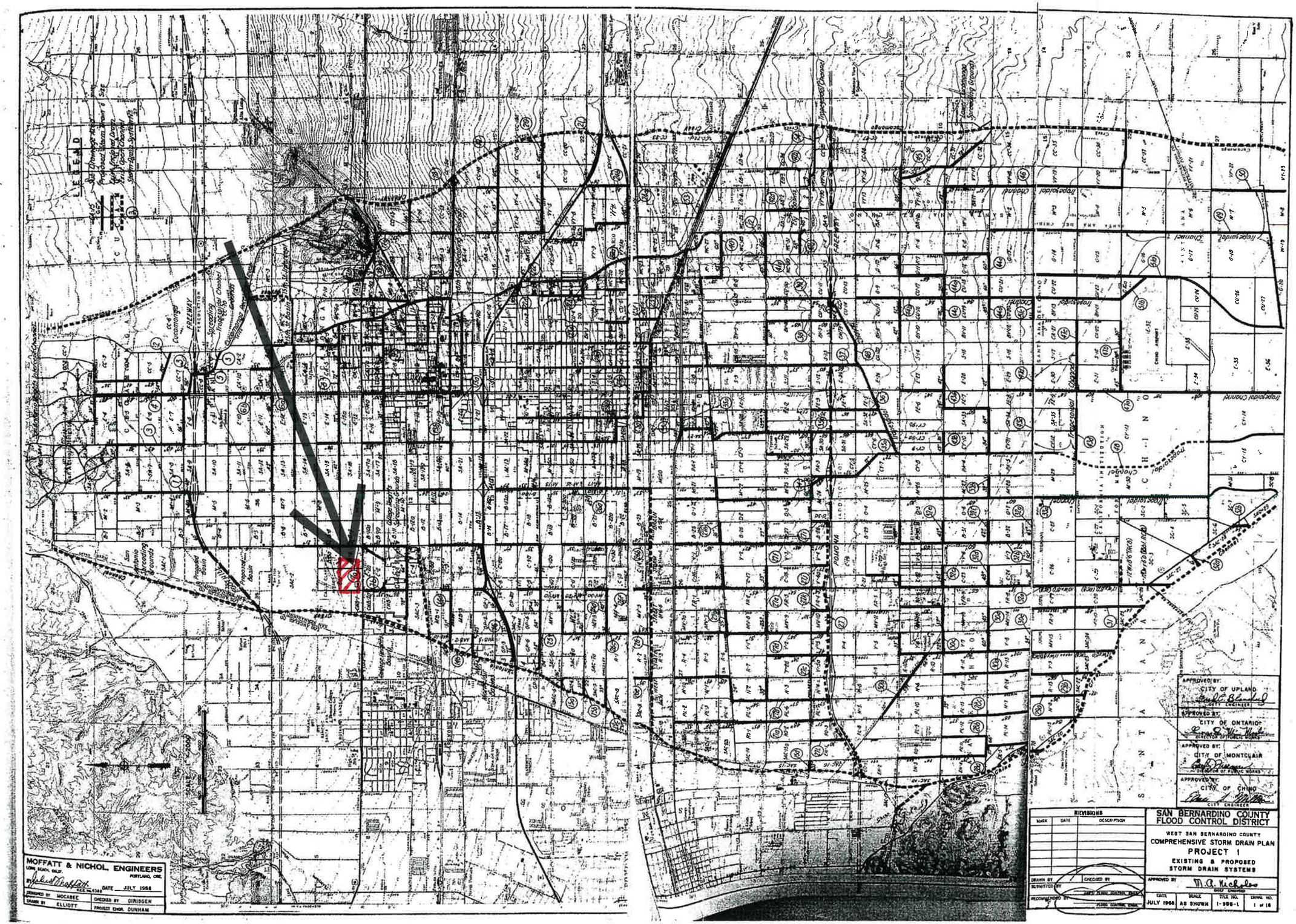
EXHIBIT "A" – HYDROLOGY MAP

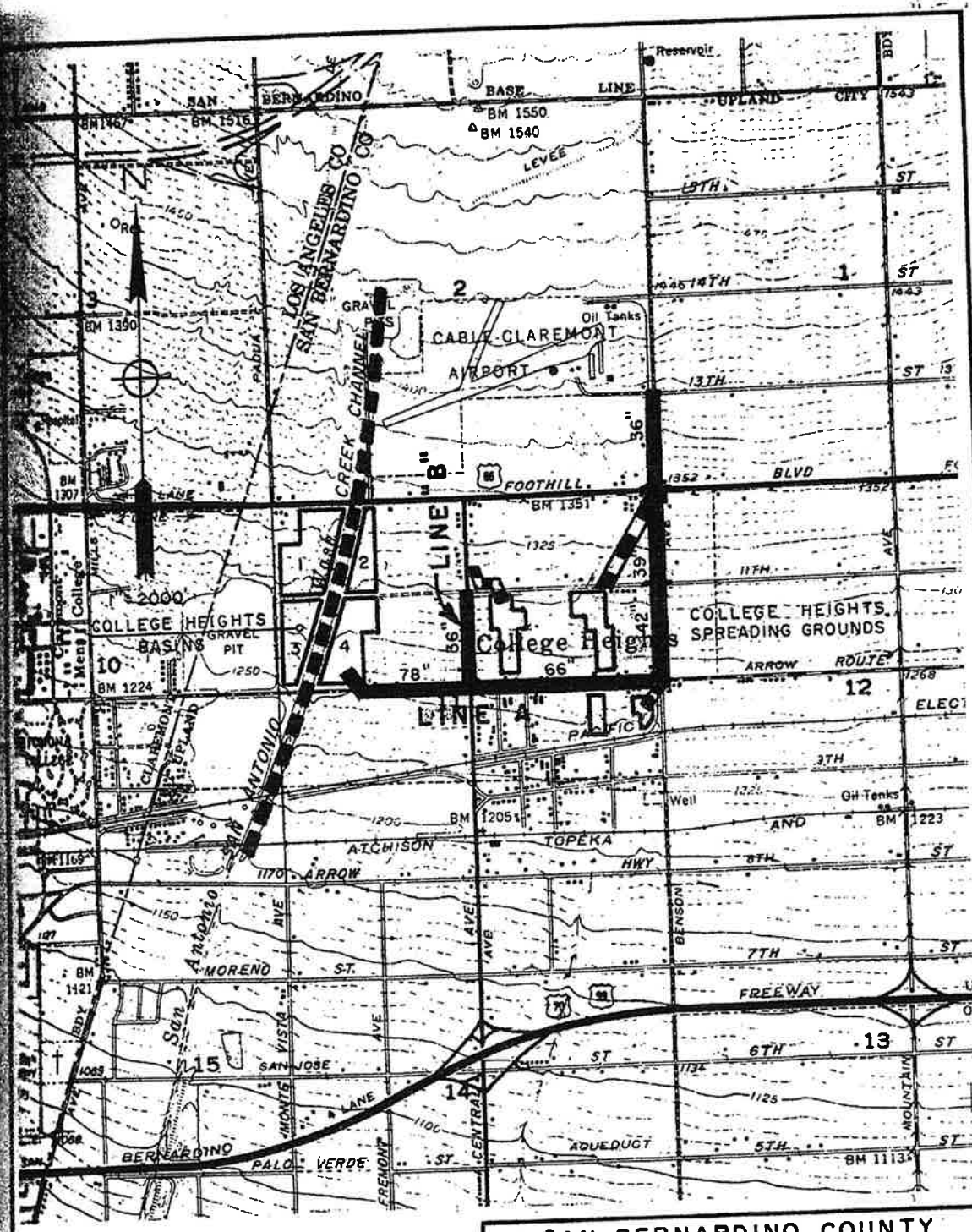
WEST UPLAND STORM DRAIN MASTER PLAN

AEI•CASC ENGINEERING
937 SOUTH VIA LATA
SUITE 500
COLTON, CA 92324
PH. (909) 783-0101 FAX (909) 783-0108


CITY OF UPLAND
CABLE AIRPORT
PROJECT SITE
14TH STREET
THIRTEENTH STREET
FOOTHILL BLVD.
ELEVENTH STREET
SANBAG CORRIDOR
BENSON AVENUE
CENTRAL AVENUE
MOUNTAIN AVENUE
SAN ANTONIO CHANNEL
EXIST. CHANNEL
CONC. CHANNEL

#2731


LEGEND
San Bernardino County Flood Control District Storm Drain System
City Storm Drain System
Storm Drain System
Proposed Basin
Existing Basin
Proposed Channel
Existing Channel
Freeway
Santa Ana River
Riverside Channel
Etiwanda Channel
Cucamonga Channel
Deer Creek Channel
Day Creek Channel
Mill Creek
Cucamonga Spreading Grounds
San Antonio Spreading Grounds
Upland
Ontario
Montclair
Chino
SANTA ANA RIVER
SAN ANTONIO CHANNEL
SAN ANTONIO CREEK
MOFFATT & NICHOL, ENGINEERS
LONG BEACH, CALIF.
PORTLAND, ORE.
DATE JULY 1966
DESIGNED BY MCCABEE
CHECKED BY GIRISGEN
DRAWN BY ELLIOTT
PROJECT ENGR. DUNHAM
REVISIONS
MARK
DATE
DESCRIPTION
DRAWN BY
CHECKED BY
SUBMITTED BY
RECOMMENDED BY
APPROVED BY:
CITY OF UPLAND
CITY ENGINEER
APPROVED BY:
CITY OF ONTARIO
CITY ENGINEER
APPROVED BY:
CITY OF MONTCLAIR
DIRECTOR OF PUBLIC WORKS
APPROVED BY:
CITY OF CHINO
CITY ENGINEER
SAN BERNARDINO COUNTY
FLOOD CONTROL DISTRICT
WEST SAN BERNARDINO COUNTY
COMPREHENSIVE STORM DRAIN PLAN
PROJECT 1
EXISTING & PROPOSED
STORM DRAIN SYSTEMS
APPROVED BY
CHIEF ENGINEER
DATE
JULY 1966
SCALE
AS SHOWN
FILE NO.
1-966-1
DRWG. NO.
1 of 16



LEGEND

- STORM DRAINS TO BE CONSTRUCTED
- EXISTING OPEN CHANNEL
- EXISTING ENCLOSED DRAIN

SAN BERNARDINO COUNTY
FLOOD CONTROL DISTRICT

COMPREHENSIVE STORM DRAIN PLAN
PROJECT NO. 1-7

PREPARED BY
MOFFATT & NICHOL, ENGINEERS
122 W. FIFTH ST. – LONG BEACH, CALIFORNIA

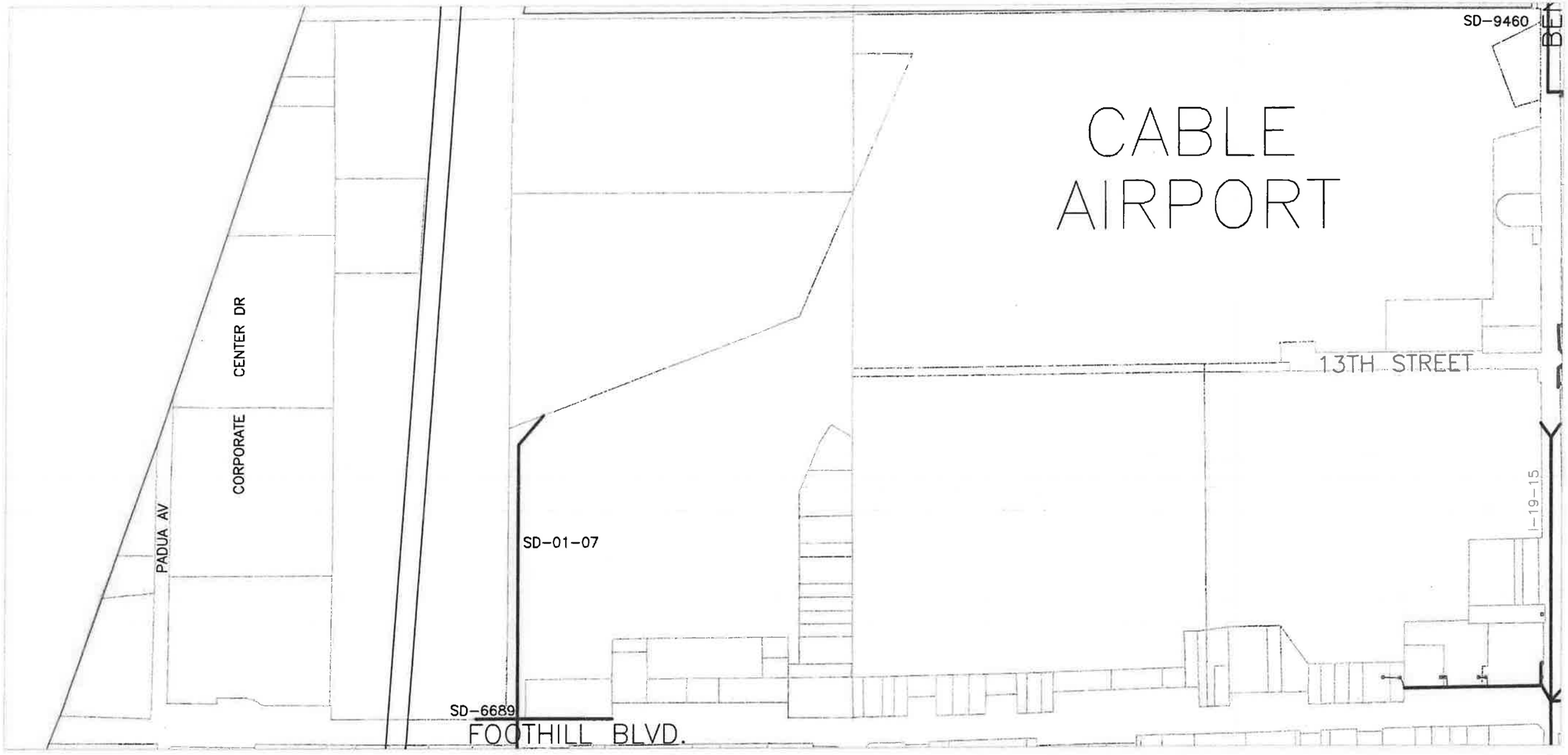
JULY 1966

DRAWING 1 OF 4

CITY OF UPLAND

ENVIRONMENTAL DIVISION

#2A



#11A

Scale 1" = 400'

STORMDRAIN INDEX MAP - #2B

SEPTEMBER 2011

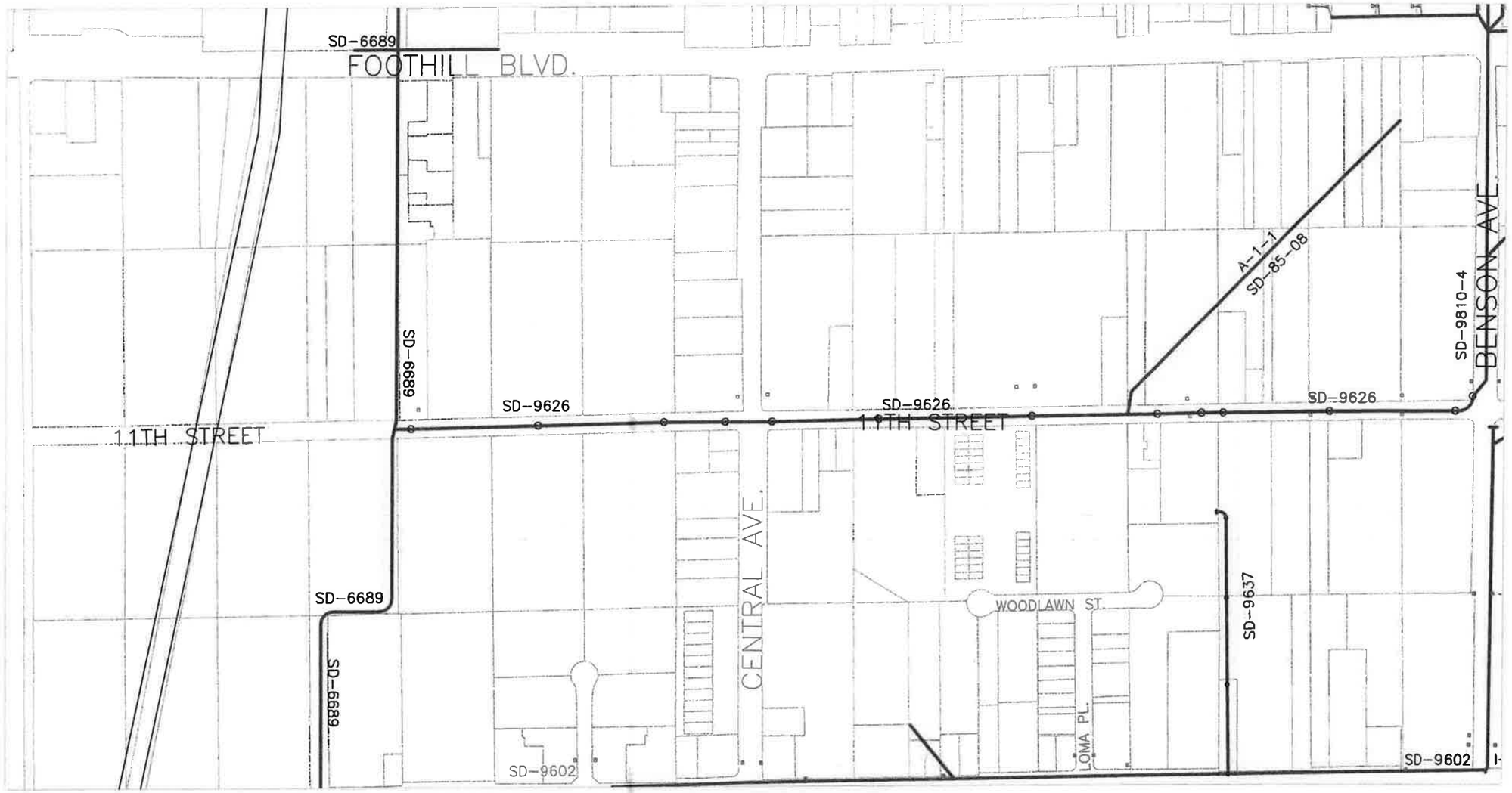
CITY OF UPLAND

ENVIRONMENTAL DIVISION

#2B

#10A

#12A



#11B

Scale 1" = 400'

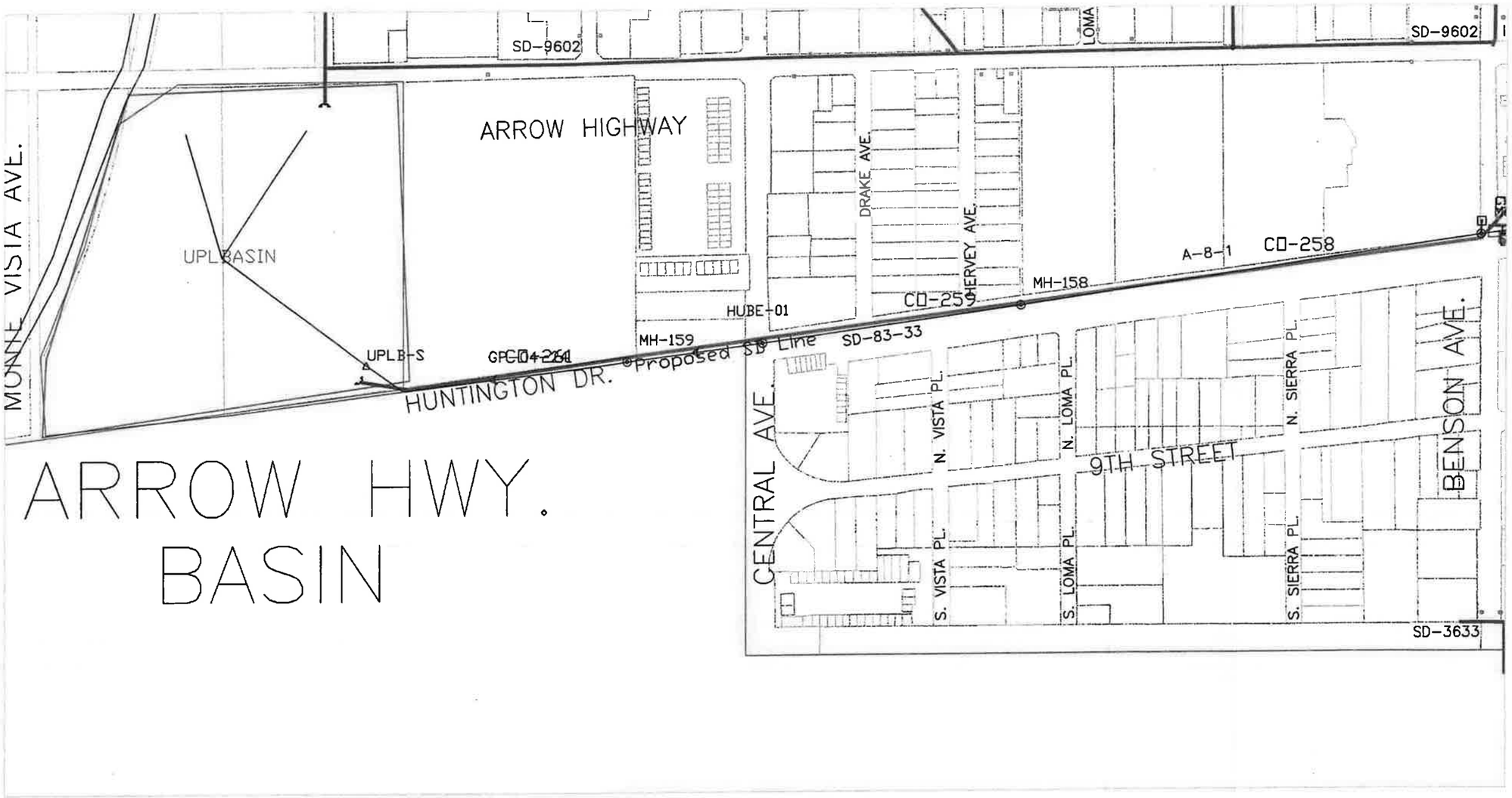
STORMDRAIN INDEX MAP - #11A

SEPTEMBER 2011

CITY OF UPLAND

ENVIRONMENTAL DIVISION

#10A



#10B

12B

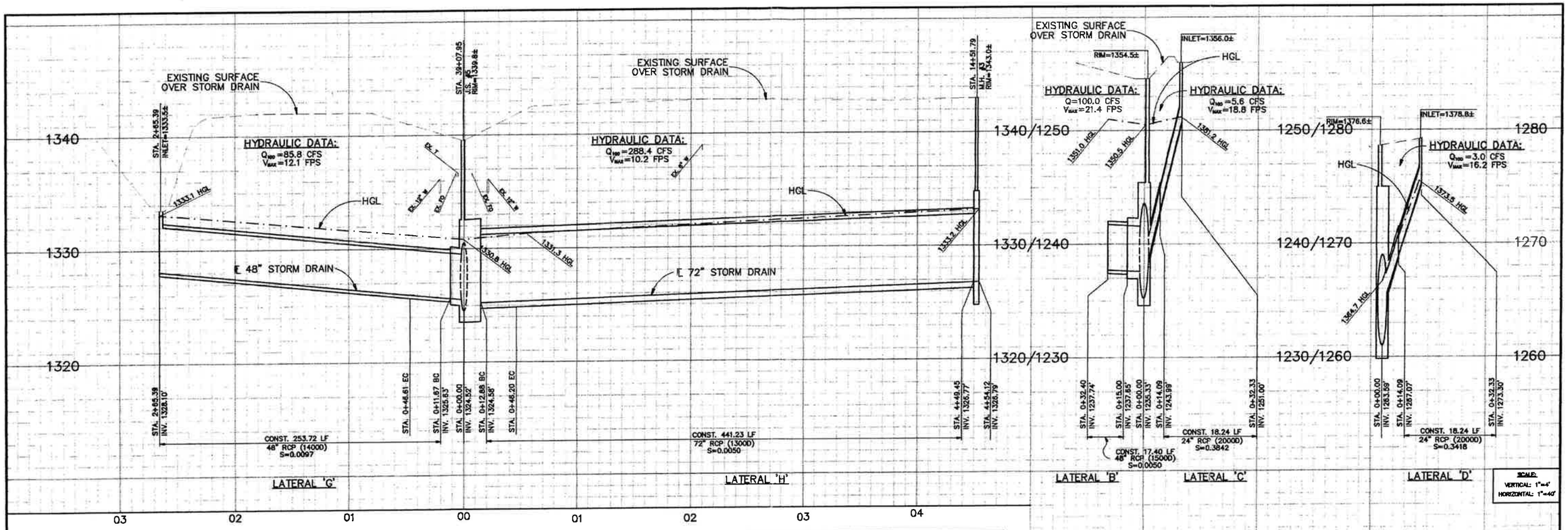
ARROW HWY.
BASIN

CITY OF UPLAND CALIFORNIA

STORMDRAIN INDEX MAP - #11B

Scale 1" = 400'

SEPTEMBER 2011



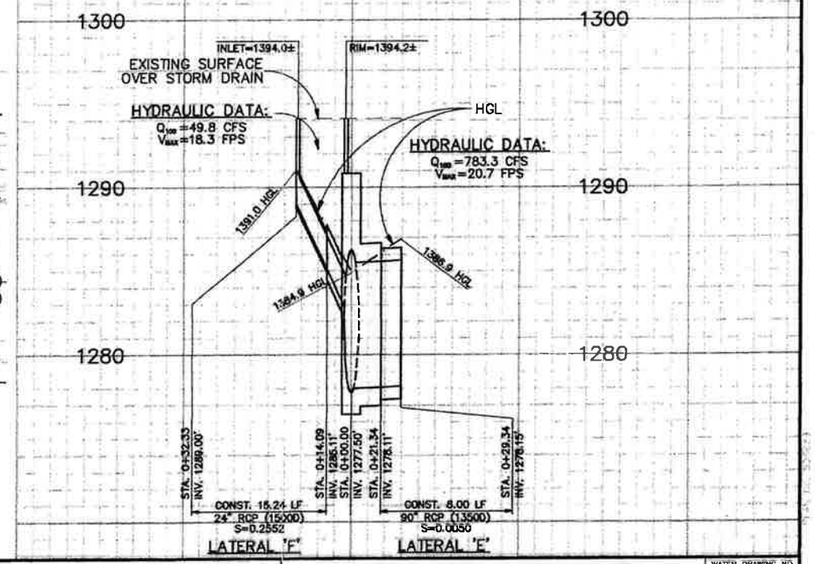
CURVE/LINE TABLE				
#	DELTA/BEARING	RADIUS	LENGTH	TANGENT
19	N89°20'45"W	---	218.78'	---
20	44°29'27"	45.00'	34.94'	18.41'
21	44°2'55"	45.00'	33.31'	17.46'
22	N89°20'45"W	---	405.59'	---

CONSTRUCTION NOTES:

5. CONSTRUCT 72" RCP (SEE PROFILE FOR D-LOAD).
6. CONSTRUCT 48" RCP (SEE PROFILE FOR D-LOAD).
9. CONSTRUCT JUNCTION STRUCTURE PER AMERICAN PUBLIC WORKS ASSOCIATION STANDARD DETAIL NO. 322-1.
10. CONSTRUCT MANHOLE PER AMERICAN PUBLIC WORKS ASSOCIATION STANDARD DETAIL NO. 320-1 WITH 5' RADIUS OF ASPHALT CONCRETE PAVEMENT AROUND INLET.
11. CONSTRUCT DROP INLET PER CALTRANS STANDARD DETAIL NO. D75A TYPE OMP. GRADE TO DRAIN TO STRUCTURE.

CONSTRUCTION NOTES CONT.:

13. CONSTRUCT BULKHEAD PER RIVERSIDE COUNTY FLOOD CONTROL STANDARD DET. NOS. M804 & M816.
14. REMOVE AND RECONSTRUCT OR CONSTRUCT CHAINLINK FENCE AS REQUIRED.
17. CONSTRUCT 12" ASPHALT CONCRETE PAVEMENT.
20. CONSTRUCT PCC SIDEWALK PER STANDARD DRAWING CU-P-3.
21. CONSTRUCT ASPHALT CONCRETE CURB.
22. REMOVE AND REPLACE FIRE HYDRANT AS REQUIRED.



Underground Service Alert
Call: TOLL FREE 1-800 227-2600
TWO WORKING DAYS BEFORE YOU DIG

BENCH MARK NO. 14G-86
LOCATION
FOUND 2" CITY OF UPLAND BRASS DISK MKD. "14G-86" IN NW HEADWALL FOR WASH BRIDGE, 28' N. OF C/L ARROW HWY & 1653' W. OF CENTRAL PER CITY OF UPLAND RECORDS
ELEV.: 1256.198'

REVISIONS					
MARK	DATE	INITIAL	DESCRIPTION	DATE	APP'VD

REGISTERED PROFESSIONAL ENGINEER MICHAEL PATRICK THORNTON No. 44226 Exp. 6-30-05 CIVIL STATE OF CALIFORNIA

TKE ENGINEERING, INC.
4446 CENTRAL AVENUE
RIVERSIDE, CA 92506
(909) 680-0410
FAX: (909) 680-0490

MICHAEL PATRICK THORNTON R.C.E. No. 44226
EXPIRES: 6-30-05
6/18/03

DRAWN BY:	MLS
DESIGNED BY:	TMR
CHECKED BY:	MPT
RECOMMENDED BY:	RH

REVIEWED BY CITY STAFF

DEPARTMENT	INITIAL	DATE
PUBLIC WORKS (OPER.)	PJA	
PUBLIC WORKS (ENV.)	RS	8/4
PUBLIC WORKS (WATER)	JM	8/21/03
PUBLIC WORKS (TRAF.)	AG	8/21/03
FIRE DEPT.	NJG	

APPROVED BY:
PUBLIC WORKS DIRECTOR / CITY ENGINEER
R.C.E. 54786 EXP. DATE 12/31/06
DATE 8/26/03

RECOMMENDED BY:
DEPUTY CITY ENGINEER 8/26/03

RECOMMENDED BY:
DEVELOPMENT SERVICES

CITY OF UPLAND

FOOTHILL BOULEVARD STORM DRAIN

LATERAL PLAN/PROFILE SHEET

WATER DRAWING NO.

SHEET 5 OF 8 SHEETS

DRAWING NO. SD6689

PROPOSED PLAN AND PROFILE OVER STORM DRAIN

EXIST. SEWER MH

EXIST. SEWER LINE & MANHOLE

EXIST. EDGE OF PAVEMENT

EXIST. 24" RCP STORM DRAIN

EXIST. 8" VCP SEWER PER DWG. NO. 20-488

EXIST. 8" VCP SEWER PER DWG. NO. 20-488

EXIST. 8" VCP SEWER PER DWG. NO. 20-488

GENERAL NOTES

1. ALL WORK CALLED FOR ON THE PLANS SHALL BE IN COMPLIANCE WITH CURRENT CITY OF UPLAND STANDARD SPECIFICATIONS, ADOPTED BY CITY COUNCIL, UNLESS OTHERWISE NOTED ON THE PLANS OR IN THE SPECIAL PROVISIONS FOR THIS PROJECT.
2. THE CONTRACTOR, BEFORE UNDERTAKING ANY GRADING OR CONSTRUCTION WORK OF ANY TYPE WITHIN THE PUBLIC RIGHT OF WAY, MUST FIRST OBTAIN A CONSTRUCTION PERMIT FROM THE PUBLIC WORKS DEPARTMENT.
3. A TEMPORARY STREET CLOSURE PERMIT IS REQUIRED IN ALL CASES WHERE WORK WILL IN ANY WAY INTERFERE WITH VEHICULAR OR PEDESTRIAN TRAFFIC. THE CONTRACTOR IS ADVISED THAT CITY COUNCIL RESOLUTION NO. 1656, DEALING WITH PROMPT RESTORATION OF CITY STREETS TORN UP DURING CONSTRUCTION, WILL BE ENFORCED IN ALL CASES WHERE THE PROVISIONS THEREOF ARE APPLICABLE.
4. INSPECTION BY THE CITY OF THE WORK CALLED FOR ON THE PLANS SHALL NOT, IN ANY WAY, RELIEVE THE CONTRACTOR AND/OR DEVELOPER OF THEIR OBLIGATION TO PERFORM WORK IN COMPLIANCE WITH THE PLANS AND SPECIFICATIONS.
5. ANY ALTERATIONS OR VARIANCES FROM THE PLANS, EXCEPT MINOR ADJUSTMENTS IN THE FIELD TO MEET EXISTING CONDITIONS, SHALL BE REQUESTED IN WRITING AND MAY NOT BE INSTITUTED UNTIL APPROVED BY THE PUBLIC WORKS DIRECTOR OR HIS REPRESENTATIVES ACTING SPECIFICALLY UPON HIS INSTRUCTIONS.
6. ALL ELEVATIONS SHOWN ON THE PLANS ARE ESTABLISHED FROM CITY OF UPLAND DATUM PLANE.
7. QUANTITIES, AS SHOWN ON THE PLANS, ARE ESTIMATED, AND THE CONTRACTOR IS ADVISED THAT FINAL QUANTITIES OF MATERIAL AND WORK IN PLACE MAY BE SOMEWHAT GREATER OR LESS THAN THOSE INDICATED ON THE PLANS.
8. CONCRETE ITEMS WHICH WILL BE SUBJECT TO VEHICULAR TRAFFIC SHALL BE BARRICADED, AND NO VEHICULAR TRAFFIC SOONER THAN SEVEN DAYS AFTER PLACING, OR WHEN THE CONTRACTOR FOR CONVENIENCE OF OPERATION SO DESIRES, CONCRETE CONTAINING EIGHT SACKS OF CEMENT PER CUBIC YARD MAY, AND SHALL IF SO DIRECTED BY THE ENGINEER, BE USED, AND TRAFFIC WILL BE PERMITTED THEREON SEVENTY-TWO HOURS AFTER PLACING OF SAID EIGHT SACK CONCRETE.
9. THE CONTRACTOR SHALL OPERATE IN A MANNER COMPLIANT WITH ALL APPLICABLE SECTIONS OF THE MUNICIPAL CODE AND COMPLIANT WITH ALL APPLICABLE CITY COUNCIL RESOLUTIONS.
10. ALL STATIONING REFERS TO CENTERLINE OF CONSTRUCTION UNLESS OTHERWISE NOTED. CATCH BASIN STATIONING IS BASED ON STREET CENTERLINE STATIONING.
11. STATIONING FOR LATERALS AND CONNECTOR PIPES REFERS TO THE CENTERLINE CENTERLINE INTERSECTION AND IS BASED ON STORM DRAIN STATIONING. STREET CENTERLINE STATIONING AND STORM DRAIN STATIONING ARE SEPARATE AND DIFFERENT FROM EACH OTHER.
12. PROTECT ALL UTILITIES, POLES, SIGNS, AND EXISTING IMPROVEMENTS IN PLACE UNLESS OTHERWISE DIRECTED BY THE ENGINEER OR NOTED ON THE PLANS. WHERE RELOCATION OF THESE UTILITIES ARE REQUIRED, THE CONTRACTOR SHALL COORDINATE CONSTRUCTION AS NECESSARY AND AS APPROVED BY THE ENGINEER.
13. OPENINGS RESULTING FROM THE CUTTING OR PARTIAL REMOVAL OF EXISTING CULVERTS PIPES, OR SIMILAR STRUCTURES TO BE ABANDONED SHALL BE SEALED WITH 6"OF CLASS "B" CONCRETE.
14. "V" IS THE DEPTH OF INLET OF CATCH BASINS MEASURED FROM THE TOP OF CURB TO INVERT OF THE OUTLET CONNECTOR PIPE.
15. CATCH BASINS SHALL BE LOCATED SO THAT THE LOCAL DEPRESSION SHALL BEGIN AT CURB RETURN JOINTS, UNLESS OTHERWISE NOTED ON PLANS.
16. IRRIGATION LINES WITHIN ANY CITY RIGHT-OF-WAY SHALL HAVE A TWENTY-FOUR INCH MINIMUM COVER FROM FINISH SURFACE, UNLESS SAID IRRIGATION LINE IS ENCASED IN CONCRETE OR BEDDED IN A SPECIAL CONCRETE CRADLE.
17. THE LOCATION OF UNDERGROUND UTILITY OR IRRIGATION LINES AS SHOWN ON THE PLANS, IS APPROXIMATE, AND SINCE THE ACTUAL LOCATION MAY BE SOMEWHAT DIFFERENT FROM THAT SHOWN, THE CONTRACTOR IS REQUIRED TO CONTACT THE INTERESTED UTILITY OR WATER COMPANY BEFORE EXCAVATING IN THE VICINITY OF ANY SUCH LINES.
18. THE FOLLOWING CITY OF UPLAND STD. DWGS. APPLY TO THIS PROJECT AND SHALL BE CONSIDERED AS PART OF THESE PLANS: CU-0-1, CU-0-2, CU-P-3, CU-P-4, CU-P-8, CU-R-2, CU-R-3, CU-S-1, CU-S-6 AND W6-23
19. INSTALL PLYWOOD FALSE BOTTOMS IN ALL SEWER MANHOLES WITHIN THE CONSTRUCTION AREA. CHECK DAILY BY INSPECTOR
20. THE CONTRACTOR, BEFORE UNDERTAKING ANY GRADING OR CONSTRUCTION WORK OF ANY TYPE WITHIN THE SAN BERNARDINO COUNTY FLOOD CONTROL DISTRICT RIGHT-OF-WAY, MUST FIRST OBTAIN A CONSTRUCTION PERMIT FROM THE SAN BERNARDINO COUNTY FLOOD CONTROL DISTRICT.
21. THE DEVELOPER SHALL BE RESPONSIBLE FOR SUBMITTING TO THE CITY, PROOF THAT A NOTICE OF INTENT (NOI) FOR THE GENERAL PERMIT FOR STORM WATER DISCHARGES ASSOCIATED WITH CONSTRUCTION ACTIVITY HAS BEEN FILED WITH AND APPROVED BY THE STATE WATER RESOURCES CONTROL BOARD. CONSTRUCTION SHALL NOT COMMENCE WITHOUT THIS APPROVAL. THE DEVELOPER SHALL BE RESPONSIBLE TO COMPLY WITH THE GENERAL CONSTRUCTION ACTIVITY STORM WATER PERMIT BY IMPLEMENTING THEIR STORM WATER POLLUTION PREVENTION PLAN FOR THE DURATION OF THE PROJECT.
22. ALL CATCH BASINS AND STORM DRAIN INLET FACILITIES SHALL BE STENCILED WITH THE APPROPRIATE "NO DUMPING" MESSAGE AS SUPPLIED BY THE PUBLIC WORKS DEPARTMENT, ENVIRONMENTAL DIVISION.

SURVEY MONUMENT NOTE:

SURVEY MONUMENTS THAT EXIST AS SHOWN ON RECORDED MAPS, HIGHWAY MAPS OR POINTS THAT PROVIDE SURVEY CONTROL WITHIN THE CONSTRUCTION AREA, SHALL BE LOCATED AND REFERENCED OUT BY A LICENSED LAND SURVEYOR OR REGISTERED CIVIL ENGINEER (AUTHORIZED TO PRACTICE LAND SURVEYING), AND CORNER RECORDS SHALL BE FILED WITH THE COUNTY SURVEYOR PRIOR TO THE START OF CONSTRUCTION. THESE CORNER RECORDS SHALL DESCRIBE THE MONUMENTS FOUND WITH TIE DISTANCES TO REFERENCE POINTS FOR RESETTING OF THE SURVEY MONUMENT. WHEN CONSTRUCTION IS COMPLETED, MONUMENTS SHALL BE SET AND CORNER RECORDS SHALL BE FILED WITH THE COUNTY SURVEYOR SHOWING THE NEW MONUMENTS.

ENGINEERS NOTICE TO CONTRACTOR

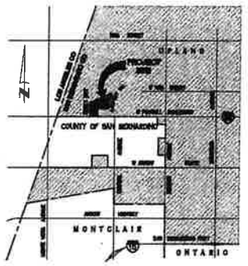
THE EXISTENCE AND APPROXIMATE LOCATION OF ANY UNDERGROUND UTILITIES PIPES OR STRUCTURES SHOWN ON THESE PLANS ARE OBTAINED BY A SEARCH OF AVAILABLE RECORDS. TO THE BEST OF OUR KNOWLEDGE, THERE ARE NO EXISTING UTILITIES OR STRUCTURES EXCEPT AS SHOWN ON THESE PLANS. THE ENGINEER ASSUMES NO LIABILITY AS TO THE EXACT LOCATION NEITHER OF SAID LINES NOR FOR UTILITIES OR IRRIGATION LINES WHOSE LOCATIONS ARE NOT SHOWN. THE CONTRACTOR SHALL BE RESPONSIBLE FOR NOTIFYING ALL UTILITY AND IRRIGATION COMPANIES PRIOR TO WORK ON EXCAVATION TO DETERMINE EXACT LOCATION OF ALL LINE AFFECTING THIS WORK, WHETHER OR NOT SHOWN HEREON, AND FOR ANY DAMAGE OR PROTECTION OF THESE LINES.

THE CONTRACTOR SHALL CALL IN A LOCATION REQUEST TO UNDERGROUND SERVICE ALERT (U.S.A.) PHONE 1-800-227-2600 TWO WORKING DAYS PRIOR TO DIGGING. NO CONSTRUCTION PERMIT ISSUED BY PUBLIC WORKS DEPARTMENT SHALL BE VALID INVOLVING UNDERGROUND FACILITIES UNLESS THE APPLICANT HAS AN INQUIRY IDENTIFICATION NUMBER ISSUED BY U.S.A.

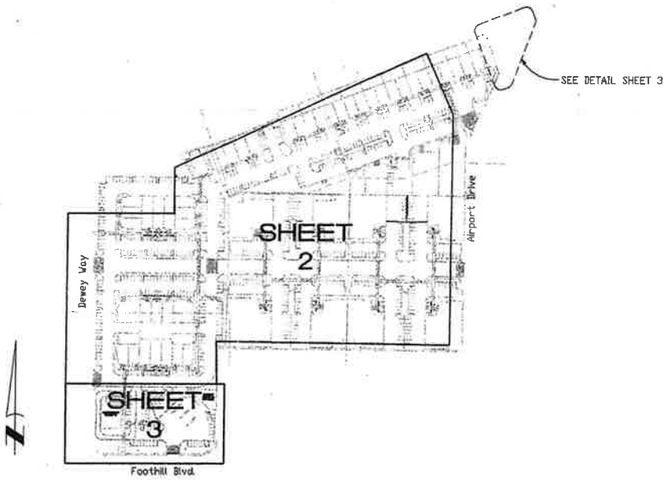
REGISTERED PROFESSIONAL ENGINEER — G. CURT INGRAHAM — No. 44780 — Exp. 12-31-08 — CIVIL — STATE OF CALIFORNIA

Underground Service Alert — Call: TOLL FREE 1-800 227-2600 — TWO WORKING DAYS BEFORE YOU DIG

SITE IMPROVEMENT PLANS
FOR
CABLE BUSINESS PARK



LOCATION MAP
NTS



INDEX MAP
N.T.S.

OWNER / DEVELOPER

CABLE DEVELOPMENT, L.L.C.
428 EAST 25TH STREET
UPLAND, CA 91784-1106

PH: (909) 931-1020
FAX (909) 982-4410

CONTACT: MR. GEORGE O VOIGT

SOILS ENGINEER

RMA GROUP
10851 EDISON CT.
RANCHO CUCAMONGA, CA 91730

PH: (909) 989-1751
FAX (909) 989-4287

CONTACT: MR. EO LYON

CONTRACTOR'S RESPONSIBILITY FOR SAFETY

IN SUBMITTING A BID FOR THIS WORK THE CONTRACTOR AGREES THAT HE SHALL ASSUME SOLE AND COMPLETE RESPONSIBILITY FOR JOB SITE CONDITIONS DURING THE COURSE OF CONSTRUCTION OF THIS PROJECT; INCLUDING SAFETY OF ALL PERSONS AND PROPERTY; THAT THIS REQUIREMENT SHALL APPLY CONTINUOUSLY AND NOT BE LIMITED TO NORMAL WORKING HOURS, AND THAT THE CONTRACTOR SHALL DEFEND, INDEMNIFY AND HOLD THE OWNER, THE ENGINEER AND THE CITY OF UPLAND HARMLESS FROM ANY AND ALL LIABILITY, REAL OR ALLEGED, IN CONNECTION WITH THE PERFORMANCE OF WORK ON THIS PROJECT, EXCEPTING FOR LIABILITY ARISING FROM THE SOLE NEGLIGENCE OF THE OWNER, THE ENGINEER, OR THE CITY OF UPLAND.

ALL CONTRACTORS AND SUBCONTRACTORS PERFORMING WORK SHOWN ON OR RELATED TO THESE PLANS SHALL CONDUCT THEIR OPERATIONS SO THAT EMPLOYEES ARE PROVIDED A SAFE PLACE TO WORK AND THE PUBLIC IS PROTECTED. ALL CONTRACTORS AND SUBCONTRACTORS SHALL COMPLY WITH THE "OCCUPATIONAL SAFETY AND HEALTH REGULATIONS" OF THE U.S. DEPARTMENT OF LABOR AND WITH "CONSTRUCTION SAFETY ORDERS". THE CIVIL ENGINEER SHALL NOT BE RESPONSIBLE IN ANY WAY FOR THE CONTRACTOR OR SUBCONTRACTORS COMPLIANCE WITH SAID REGULATIONS AND ORDERS.

ABBREVIATIONS

APWA	AMERICAN PUBLIC WORKS ASSOCIATION
BF	BOTTOM OF FOOTING
BOP	BOTTOM OF PIPE
FL	FLOW LINE
HDPE	HIGH DENSITY POLYETHYLENE PIPE
INV	INVERT
RCP	REINFORCED CONCRETE PIPE
SD	STORM DRAIN
TC	TOP OF CURB
TG	TOP OF GRATE
TOP	TOP OF PIPE
USA	UNDEGROUND SERVICE ALERT

AGENCY/UTILITY CONTACT LIST

SOUTHERN CALIFORNIA EDISON
216 NORTH EUCLID AVENUE
ONTARIO, CALIFORNIA 91761
(800) 684-8123

SAN ANTONIO WATER CO.
139 NORTH EUCLID AVENUE
UPLAND, CALIFORNIA 91786
(909) 982-4107

CITY OF UPLAND
WATER DIVISION
1370 NORTH BENSON AVENUE
UPLAND, CALIFORNIA 91786
(909) 931-4230

VERIZON
1400 EAST PHILLIPS BOULEVARD
POMONA, CALIFORNIA 91766-5432
(909) 469-6336

THE GAS CO.
P.O. BOX 3003
REDLANDS, CALIFORNIA 92373
(800) 427-2200

CITY OF UPLAND
DEVELOPMENT SERVICES
460 NORTH EUCLID AVENUE
UPLANDS, CALIFORNIA 91786
(909) 931-4133 OR (909) 931-4145

CONSTRUCTION NOTES

(1)	NOT USED	
(2)	NOT USED	
(3)	INSTALL 30" INLINE DRAIN WITH CAST IRON GRATE (H-20 RATED), N-12 DOWN DRAIN (Part No. 2730AG12) and 12" N-12 FABRICATED 90° BEND (Part No. 1299-AN) PER ADVANCED DRAINAGE SYSTEMS, Inc.	3 EA
(4)	CONSTRUCT 30"ø N-12 PROLINK ULTRA HDPE DRAIN PIPE BY ADVANCED DRAINAGE SYSTEMS, Inc.	388 LF
(5)	CONSTRUCT 24"ø N-12 PROLINK ULTRA HDPE DRAIN PIPE BY ADVANCED DRAINAGE SYSTEMS, Inc.	352 LF
(6)	CONSTRUCT 18"ø N-12 PROLINK ULTRA HDPE DRAIN PIPE BY ADVANCED DRAINAGE SYSTEMS, Inc.	117D LF
(7)	CONSTRUCT 15"ø N-12 PROLINK ULTRA HDPE DRAIN PIPE BY ADVANCED DRAINAGE SYSTEMS, Inc.	408 LF
(8)	CONSTRUCT 12"ø N-12 PROLINK ULTRA HDPE DRAIN PIPE BY ADVANCED DRAINAGE SYSTEMS, Inc.	273 LF
(9)	INSTALL 24"x24" N-12 FABRICATED TEE PER ADVANCED DRAINAGE SYSTEMS, Inc. - Part No. 2467-AN	2 EA
(10)	INSTALL 24"x12" N-12 FABRICATED REDUCING WYE PER ADVANCED DRAINAGE SYSTEMS, Inc. - Part No. 2484-AN	1 EA
(11)	NOT USED	
(12)	INSTALL 30" INLINE DRAIN WITH CAST IRON GRATE (H-20 RATED), N-12 DOWN DRAIN (Part No. 2730AG24) PER ADVANCED DRAINAGE SYSTEMS, Inc.	2 EA
(13)	INSTALL 24"x18" N-12 FABRICATED REDUCER PER ADVANCED DRAINAGE SYSTEMS, Inc. - PART No. 2476-ANB5	2 EA
(14)	CONSTRUCT CURB INLET TYPE B-1 PER CITY OF UPLAND STD. DWG CU-S-2	1 EA
(15)	CONSTRUCT TRANSVERSE CATCH BASIN PER APWA STD. PLAN No. 305-2, 2 GRATES	7 EA
(16)	NOT USED	
(17)	CONSTRUCT GRATING CATCH BASIN, LONGITUDINAL, 3 GRATES, PER APWA STD. PLAN No. 304-2	1 EA
(18)	CONSTRUCT 36" RCP STORM DRAIN PIPE (D-2500)	180 LF
(19)	CONSTRUCT CURB INLET TYPE B-2 PER CITY OF UPLAND STD. DWG CU-S-2	1 EA
(20)	INSTALL 15" INLINE DRAIN WITH LOCKING H-20 RATED GRATE, N-12 DOWN DRAIN (PART 2715AGN) PER ADVANCED DRAINAGE SYSTEMS INC.	1 EA
(21)	INSTALL 6"ø N-12 HDPE DRAIN PIPE BY ADVANCED DRAINAGE SYSTEMS	145 LF
(22)	INSTALL 15" INLINE DRAIN WITH PEDESTRIAN GRATE (H-10 RATED), N-12 DOWN DRAIN (PART No. 2715AGN) PER ADVANCED DRAINAGE SYSTEMS, Inc.	5 EA
(23)	INSTALL 6"øN-12 FABRICATED 90° BEND (PART NO. 0699AN) ADVANCED DRAINAGE SYSTEMS, Inc	2 EA
(24)	INSTALL 6"ø N-12 FABRICATED TEE (PART No. 0661AN) ADVANCED DRAINAGE SYSTEMS, Inc.	3 LF
(25)	CONSTRUCT GRATING CATCH BASIN, LONGITUDINAL, 1 GRATE, PER APWA STD. PLAN No. 304-2	2 EA
(26)	CONSTRUCT GRATING CATCH BASIN, LONGITUDINAL, 2 GRATES, PER APWA STD. PLAN No. 304-2	7 EA
(27)	CONSTRUCT INLET TYPE "V" PER ORANGE COUNTY EMA STANDARD PLAN 1305	1 EA
(28)	CONSTRUCT JUNCTION STRUCTURE PER APWA STD. PLAN No. 332-0	1 EA
(29)	CONSTRUCT PARKWAY DRAIN PER APWA STD. PLAN No. 151-1, TYPE 1 INLET	2 EA
	ITEM NOT USED ON THIS SHEET	

PROJECT NO. SP 00-04 · PLAN NO. SD 01-07

BENCH MARK No. 29A-86
LOCATION FOOTHILL BOULEVARD AND BENSON AVENUE

2" CITY OF UPLAND BRASS CAP IN P.C.C. BASE OF TRAFFIC SIGNAL 34 FEET EAST OF ℄ BENSON AVENUE; 38 FEET NORTH OF SOUTH DRIVEWAY FOR UPLAND FIRE.

ELEV 1425.07'

REVISIONS

MARK	DATE	BY	DESCRIPTION	DATE	APP'VD

Associated Engineers, Inc
3311 E. SHELBY STREET · ONTARIO, CA 91764
TEL: (909) 989-1982 · FAX: (909) 941-0691
G. CURT INGRAHAM R.C.E. 44780 — DATE

DRAWN BY:	VAD AUGUST 2001
DESIGNED BY:	VAD AUGUST 2001
CHECKED BY:	BWL AUGUST 2001
RECOMMENDED BY:	

REVIEWED BY CITY STAFF

DEPARTMENT	INITIAL	DATE
PUBLIC WORKS (OPER.)		11/27
PUBLIC WORKS (ENV.)		11/28
PUBLIC WORKS (WATER)		11/26/01
PUBLIC WORKS (TRAF.)		11/26/01
FIRE DEPT.		

APPROVED BY:

PUBLIC WORKS DIRECTOR / CITY ENGINEER RCE 54786 Exp. DATE 12-31-03 — DATE 12/18/01

RECOMMENDED BY: DEPUTY CITY ENGINEER — 12/18/01

RECOMMENDED BY: DEVELOPMENT SERVICES

CITY OF UPLAND
CABLE BUSINESS PARK
ON-SITE PRIVATE STORM DRAIN IMPROVEMENTS

WATER DRAWING NO.
1
OF 3 SHEETS
DRAWING No.
SD 01-07

M:\2000\00033\DWG\DRAINAGE\Sht-cover.DWG

LINE TABLE		
LINE	LENGTH	BEARING
L1	54.27'	N44°32'38"W

SCALE: 1"=40'
0 20 40 80
SCALE FEET

N69°11'07"E
PROPERTY LINE 1261.91'

C/L DEWEY WAY

P/L N00°00'33"W 769.54'

(1351.82' Plm)
(1344.82' FL)

DEWEY WAY

SEE SHEET 3 OF 3

CONSTRUCTION NOTES

1. NOT USED
2. NOT USED
3. INSTALL 30" INLINE DRAIN WITH CAST IRON GRATE (H-20 RATED), N-12 DOWN DRAIN (Part No. 2730AG12) and 12" N-12 FABRICATED 90° BEND (Part No. 1299-AN) PER ADVANCED DRAINAGE SYSTEMS, Inc.
4. CONSTRUCT 30"ø N-12 PROLINK ULTRA HDPE DRAIN PIPE BY ADVANCED DRAINAGE SYSTEMS, Inc.
5. CONSTRUCT 24"ø N-12 PROLINK ULTRA HDPE DRAIN PIPE BY ADVANCED DRAINAGE SYSTEMS, Inc.
6. CONSTRUCT 18"ø N-12 PROLINK ULTRA HDPE DRAIN PIPE BY ADVANCED DRAINAGE SYSTEMS, Inc.
7. CONSTRUCT 15"ø N-12 PROLINK ULTRA HDPE DRAIN PIPE BY ADVANCED DRAINAGE SYSTEMS, Inc.
8. CONSTRUCT 12"ø N-12 PROLINK ULTRA HDPE DRAIN PIPE BY ADVANCED DRAINAGE SYSTEMS, Inc.
9. INSTALL 24"x24" N-12 FABRICATED TEE PER ADVANCED DRAINAGE SYSTEMS, Inc. – Part No. 2467-AN
10. INSTALL 24"x12" N-12 FABRICATED REDUCING WYE PER ADVANCED DRAINAGE SYSTEMS, Inc. – Part No. 2484-AN
11. NOT USED
12. INSTALL 30" INLINE DRAIN WITH CAST IRON GRATE (H-20 RATED), N-12 DOWN DRAIN (Part No. 2730AG24) PER ADVANCED DRAINAGE SYSTEMS, Inc.
13. INSTALL 24"x18" N-12 FABRICATED REDUCER PER ADVANCED DRAINAGE SYSTEMS, Inc. – PART No. 2476-AN85
14. CONSTRUCT CURB INLET TYPE B-1 PER CITY OF UPLAND STD. DWG CU-S-2
15. CONSTRUCT TRANSVERSE CATCH BASIN PER APWA STD. PLAN No. 305-2, 2 GRATES
16. NOT USED
17. CONSTRUCT GRATING CATCH BASIN, LONGITUOINAL, 3 GRATES, PER APWA STD. PLAN No. 304-2
18. CONSTRUCT 36" RCP STORM DRAIN PIPE (O-2500)
19. CONSTRUCT CURB INLET TYPE B-2 PER CITY OF UPLAND STD. DWG CU-S-2
20. INSTALL 15" INLINE DRAIN WITH LOCKING H-20 RATED GRATE, N-12 DOWN DRAIN(PART 2715AGN) PER ADVANCED DRAINAGE SYSTEMS INC.
21. INSTALL 6"ø N-12 HOPE DRAIN PIPE BY ADVANCED ORAINAGE SYSTEMS
22. INSTALL 15" INLINE DRAIN WITH PEDESTRIAN GRATE (H-10 RATED), N-12 DOWN DRAIN (PART No. 2715AGN) PER ADVANCED DRAINAGE SYSTEMS, Inc.
23. INSTALL 6"øN-12 FABRICATED 90° BEND (PART NO. 0699AN) ADVANCED DRAINAGE SYSTEMS, Inc
24. INSTALL 6"ø N-12 FABRICATED TEE (PART No. 0661AN) ADVANCED ORAINAGE SYSTEMS, Inc.
25. CONSTRUCT GRATING CATCH BASIN, LONGITUOINAL, 1 GRATE, PER APWA STD. PLAN No. 304-2
26. CONSTRUCT GRATING CATCH BASIN, LONGITUOINAL, 2 GRATES, PER APWA STD. PLAN No. 304-2
27. CONSTRUCT INLET TYPE "V" PER ORANGE COUNTY EMA STANDARD PLAN 1305
28. CONSTRUCT JUNCTION STRUCTURE PER APWA STD. PLAN No. 332-0
29. CONSTRUCT PARKWAY DRAIN PER APWA STD. PLAN No. 151-1, TYPE 1 INLET
30. ITEM NOT USED ON THIS SHEET

PLAN NO. SD 01-07
PROJECT NO. SP 00-04

Underground Service Alert
Call: TOLL FREE 1-800 227-2600
TWO WORKING DAYS BEFORE YOU DIG

BENCH MARK No. 294-86
LOCATION FOOTHILL BOULEVARD AND BENSON AVENUE

2" CITY OF UPLAND BRASS CAP IN P.C.C. BASE OF TRAFFIC SIGNAL 34 FEET EAST OF C BENSON AVENUE, 38 FEET NORTH OF SOUTH DRIVEWAY FOR UPLAND FIRE.

ELEV 1425.07'

REVISIONS					
MARK	DATE	BY	DESCRIPTION	DATE	APP'VD

REGISTERED PROFESSIONAL ENGINEER C. CHI INGRAM No. 46780 Exp. 3-31-04 CIVIL STATE OF CALIFORNIA

Associated Engineers
3311 EAST SHELBY STREET • ONTARIO, CA 91764
TEL: (909) 989-1982 • FAX: (909) 941-0891

DRAWN BY:	VAD AUGUST 2001
DESIGNED BY:	VAD AUGUST 2001
CHECKED BY:	CCI AUGUST 2001
RECOMMENDED BY:	

REVIEWED BY CITY STAFF

DEPARTMENT	INITIAL	DATE
PUBLIC WORKS (OPER.)		
PUBLIC WORKS (ENV.)		
PUBLIC WORKS (WATER)		
PUBLIC WORKS (TRAF.)		
FIRE DEPT.		

APPROVED BY:
PUBLIC WORKS DIRECTOR / CITY ENGINEER RCE 54786 Exp. DATE 12-31-03 — DATE 12/18/02

RECOMMENDED BY: DEPUTY CITY ENGINEER 12/16/02

RECOMMENDED BY: DEVELOPMENT SERVICES 11/14/02

CITY OF UPLAND

CABLE BUSINESS PARK

ON-SITE PRIVATE STORM DRAIN IMPROVEMENTS

WATER DRAWING NO.
2
OF 3 SHEETS
DRAWING No.
SD 01-07

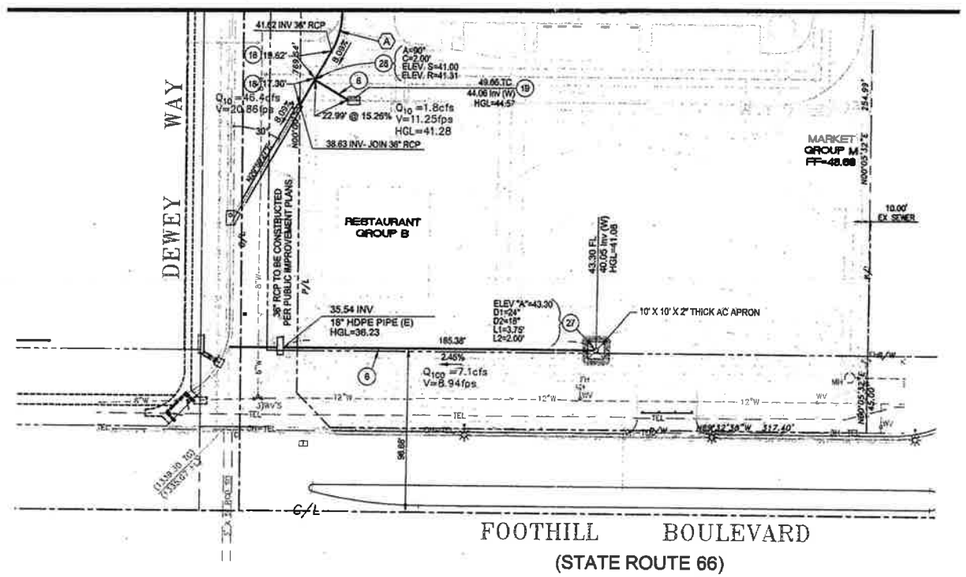
M:\2000\00033\DWG\DRAINAGE\onsite\sht2.dwg

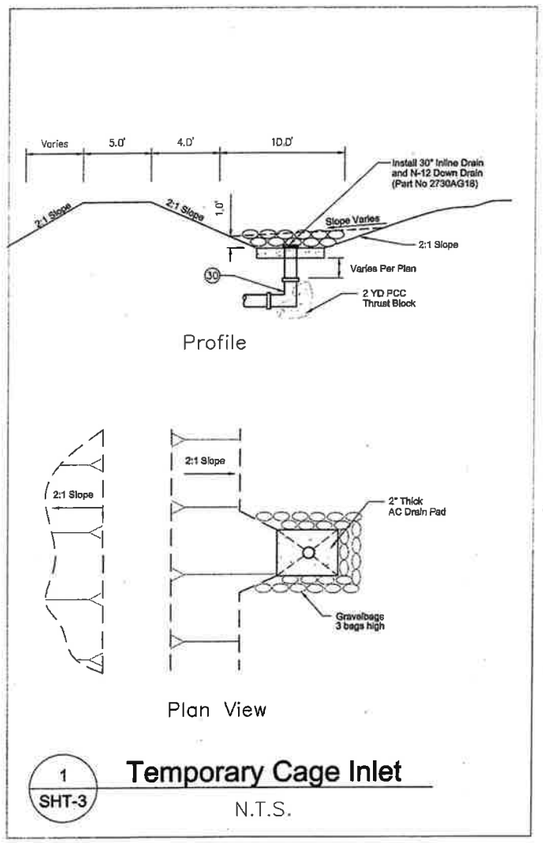
SCALE: 1"=40'

0 20 40 80

SCALE FEET

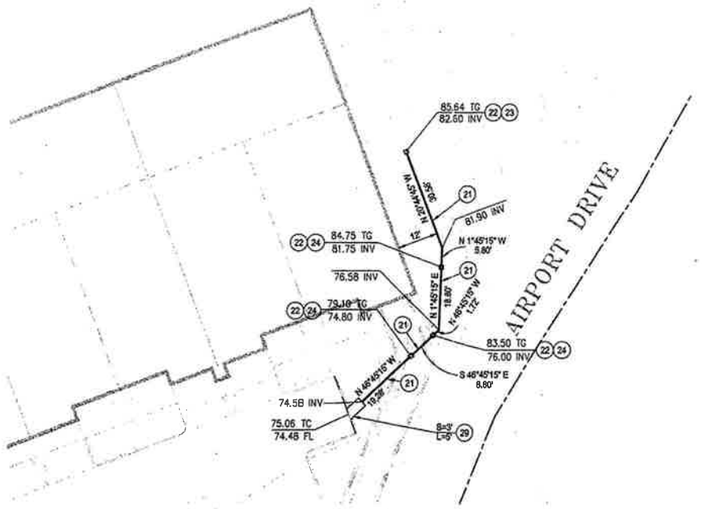
SEE SHEET 2 OF 3





1 / SHT-3 **Temporary Cage Inlet**

N.T.S.



SCALE: 1"=20'

CURVE TABLE				
	△	R	L	T
A	33°56'46"	45.00'	26.66'	13.73'

CONSTRUCTION NOTES

1. NOT USED
2. NOT USED
3. INSTALL 30" INLINE DRAIN WITH CAST IRON GRATE (H-2D RATED), N-12 DOWN DRAIN (Part No. 2730AG12) and 12" N-12 FABRICATED 90° BEND (Part No. 1299-AN) PER ADVANCED DRAINAGE SYSTEMS, Inc.
5. CONSTRUCT 30"ø N-12 PROLINK ULTRA HDPE DRAIN PIPE BY ADVANCED DRAINAGE SYSTEMS, Inc.
6. CONSTRUCT 24"ø N-12 PROLINK ULTRA HDPE DRAIN PIPE BY ADVANCED DRAINAGE SYSTEMS, Inc.
A. CONSTRUCT 18"ø N-12 PROLINK ULTRA HDPE DRAIN PIPE BY ADVANCED DRAINAGE SYSTEMS, Inc.
7. CONSTRUCT 15"ø N-12 PROLINK ULTRA HDPE DRAIN PIPE BY ADVANCED DRAINAGE SYSTEMS, Inc.
8. CONSTRUCT 12"ø N-12 PROLINK ULTRA HDPE DRAIN PIPE BY ADVANCED DRAINAGE SYSTEMS, Inc.
9. INSTALL 24"x24" N-12 FABRICATED TEE PER ADVANCED DRAINAGE SYSTEMS, Inc. - Part No. 2467-AN
10. INSTALL 24"x12" N-12 FABRICATED REDUCING WYE PER ADVANCED DRAINAGE SYSTEMS, Inc. - Part No. 2484-AN
11. NOT USED
12. INSTALL 30" INLINE DRAIN WITH CAST IRON GRATE (H-2D RATED), N-12 DOWN DRAIN (Part No. 2730AG24) PER ADVANCED DRAINAGE SYSTEMS, Inc.
13. INSTALL 24"x18" N-12 FABRICATED REDUCER PER ADVANCED DRAINAGE SYSTEMS, Inc - PART No. 2476-ANBS
14. CONSTRUCT CURB INLET TYPE B-1 PER CITY OF UPLAND STD. DWG CU-S-2
15. CONSTRUCT TRANSVERSE CATCH BASIN PER APWA STD. PLAN No. 3DS-2, 2 GRATES
16. NOT USED
17. CONSTRUCT GRATING CATCH BASIN, LONGITUDINAL, 3 GRATES, PER APWA STD. PLAN No. 304-2
18. CONSTRUCT 36" RCP STORM DRAIN PIPE (0-250D)
19. CONSTRUCT CURB INLET TYPE B-2 PER CITY OF UPLAND STD. DWG CU-S-2
20. INSTALL 15" INLINE DRAIN WITH LOCKING H-2D RATED GRATE, N-12 DOWN DRAIN(PART 2715AGN) PER ADVANCED DRAINAGE SYSTEMS INC.
21. INSTALL 6"ø N-12 HDPE DRAIN PIPE BY ADVANCED DRAINAGE SYSTEMS
22. INSTALL 15" INLINE DRAIN WITH PEDESTRIAN GRATE (H-10 RATED), N-12 DOWN DRAIN (PART No. 2715AGN) PER ADVANCED DRAINAGE SYSTEMS, Inc.
23. INSTALL 6"ø N-12 FABRICATED 90° BEND (PART NO. D699AN) ADVANCED DRAINAGE SYSTEMS, Inc.
24. INSTALL 6"ø N-12 FABRICATED TEE (PART No. 0661AN) ADVANCED DRAINAGE SYSTEMS, Inc.
26. CONSTRUCT GRATING CATCH BASIN, LONGITUDINAL, 1 GRATE, PER APWA STD. PLAN No. 304-2
28. CONSTRUCT GRATING CATCH BASIN, LONGITUDINAL, 2 GRATES, PER APWA STD. PLAN No. 3D4-2
27. CONSTRUCT INLET TYPE "V" PER ORANGE COUNTY EMA STANDARD PLAN 1305
28. CONSTRUCT JUNCTION STRUCTURE PER APWA STD. PLAN No. 332-D
29. CONSTRUCT PARKWAY DRAIN PER APWA STD. PLAN No. 151-1, TYPE 1 INLET
- ITEM NOT USED ON THIS SHEET

Underground Service Alert

Call: TOLL FREE 1-800 227-2600

TWO WORKING DAYS BEFORE YOU DIG

BENCH MARK No. 29A-86
LOCATION FOOTHILL BOULEVARD AND BENSON AVENUE

2" CITY OF UPLAND BRASS CAP IN P.C.C. BASE OF TRAFFIC SIGNAL 34 FEET EAST OF ℄ BENSON AVENUE; 38 FEET NORTH OF SOUTH DRIVEWAY FOR UPLAND FIRE.

ELEV 1425.07'

REVISIONS

MARK	DATE	BY	DESCRIPTION	DATE	APP'VD

REGISTERED PROFESSIONAL ENGINEER C. COTE MCGRAW No. 44750 Exp. 3-31-04 STATE OF CALIFORNIA CIVIL

Associated Engineers
3311 EAST SHELBY STREET · ONTARIO, CA 91764
TEL: (909) 941-0982 · FAX: (909) 941-0891

11/30/02

DRAWN BY:	VAD AUGUST 2001
DESIGNED BY:	VAD AUGUST 2001
CHECKED BY:	CCI AUGUST 2001
RECOMMENDED BY:	

REVIEWED BY CITY STAFF

DEPARTMENT	INITIAL	DATE
PUBLIC WORKS (OPER.)		11/27/02
PUBLIC WORKS (ENV.)		11/27/02
PUBLIC WORKS (WATER)		11/27/02
PUBLIC WORKS (TRAF.)	AG	11/27/02
FIRE DEPT.		11/27/02

APPROVED BY:

PUBLIC WORKS DIRECTOR/CITY ENGINEER RCE 54786 Exp. DATE 12-31-03 — 11/15/02 DATE

RECOMMENDED BY: DEPUTY CITY ENGINEER 11/14/02

RECOMMENDED BY: DEVELOPMENT SERVICES 11/14/02

CITY OF UPLAND

CABLE BUSINESS PARK

ON-SITE PRIVATE STORM DRAIN IMPROVEMENTS

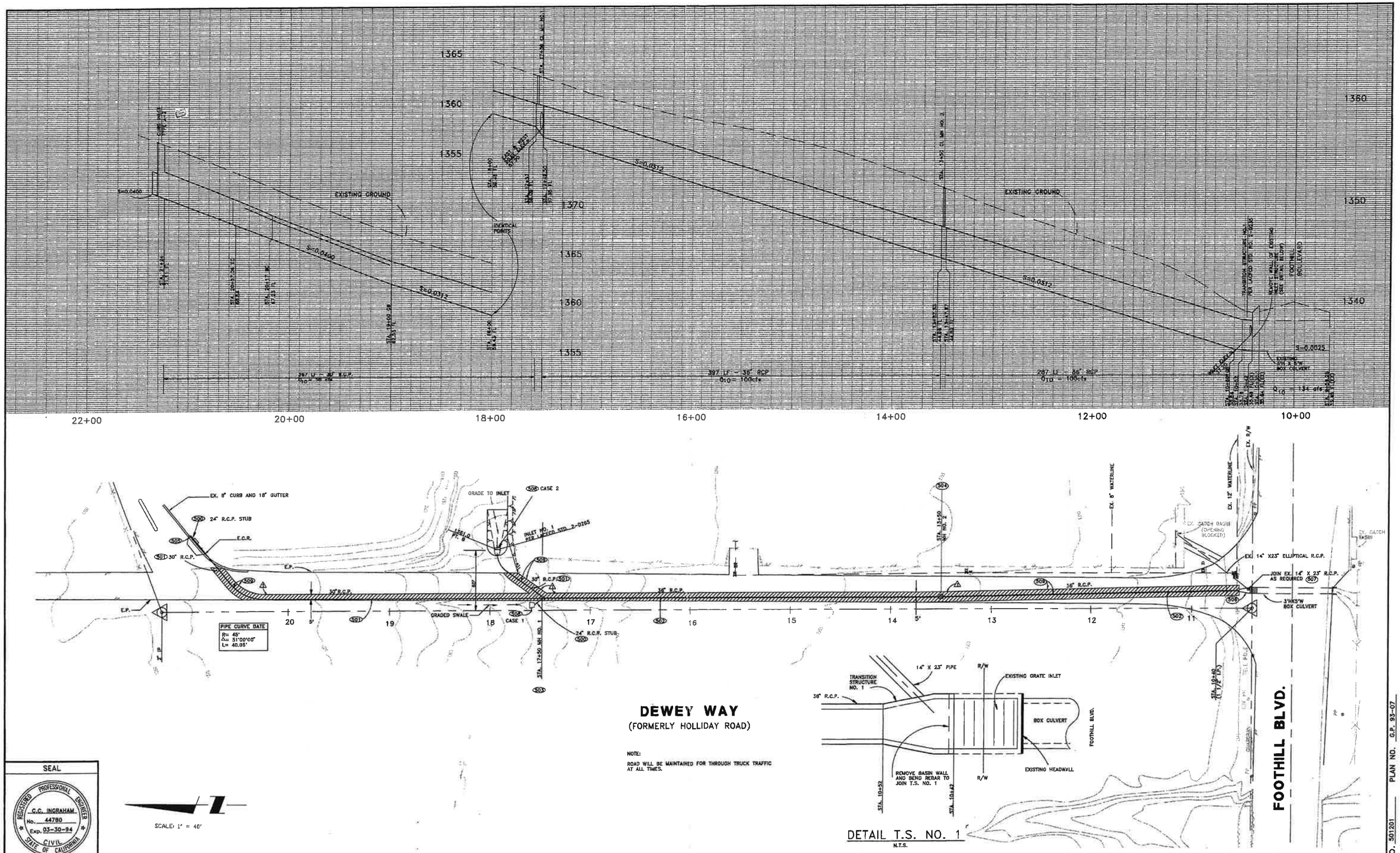
WATER DRAWING NO.

3 OF 3 SHEETS

DRAWING No. SD 01-07

PLAN NO. ——— PROJECT NO ———

M:\2000\00033\DWG\DRAINAGE\onsite\sht3.dwg



SEAL

REGISTERED PROFESSIONAL ENGINEER
C.C. INGRAHAM
No. 44780
Exp. 03-30-94
CIVIL
STATE OF CALIFORNIA

BENCH MARK NO. 29A-86
LOCATION:
2" CITY OF UPLAND BRASS CAP IN P.C.C. BASE OF TRAFFIC SIGNAL 34' EAST OF C BENSON AVENUE 38' NORTH OF SOUTH DRIVEWAY FOR UPLAND FIRE.
ELEV. 1425.07'

REVISIONS					
MARK	DATE	INITIAL	DESCRIPTION	DATE	APP'VD.
1	10/21/93	LKH	STORM DRAIN ALIGNMENT AND TRENCH REPAIR		

PLANS PREPARED BY
ASSOCIATED ENGINEERS
3311 EAST SHELBY AVENUE
ONTARIO, CALIFORNIA 91764
TEL. (909) 980-1952
FAX: (909) 941-0891
R.C.E. NO. 44780 (EXPIRES: 03-30-94) 10/1/93 DATE

DRAWN BY: L.H.
DESIGN BY: S.B./C.C.I.
CHECKED BY: C.C.I.

REVIEW BY CITY STAFF		
DEPARTMENT	INITIAL	DATE
PUBLIC WORKS (OPER)		
PUBLIC WORKS (ENV)		10/26/93
PUBLIC WORKS (WATER)		10/26/93
PUBLIC WORKS (TRAFFIC)		10/26/93
FIRE DEPT		

APPROVED BY: 10-28-93
PUBLIC WORKS DIRECTOR/CITY ENGINEER R.C.E. 39880 EXP. DATE 12-31-93 DATE
RECOMMENDED BY: DEPUTY CITY ENGINEER
RECOMMENDED BY: 10/21/93 DEVELOP. SVCS. COORD.

CITY OF UPLAND
CABLE AIRPORT
A.I.P. 05
STORM DRAIN PLAN DEWEY WAY

WATER DRAWING NO.
SHEET 14 OF 14 SHEETS
DRAWING NO. G.P. 93-07

PROJECT NO. 501201 PLAN NO. G.P. 93-07

FILE: 9338SH1.DWG
DATE: 06-25-93

APPENDIX B

HYDROLOGY CALCULATIONS

EXISTING CONDITION

```
**************************************************************************
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           Ver. 23.0  Release Date: 07/01/2016  License ID 1435

                        Analysis prepared by:



 ************************* DESCRIPTION OF STUDY *************************
* TEI 3651                                                              *
* EXISTING CONDITION                                                    *
* 100-YEAR EVENT (NODES 100-102)                                        *
 ************************************************************************

  FILE NAME: W:\3651\EX100.DAT
  TIME/DATE OF STUDY: 08:51 05/08/2018
==========================================================================
  USER SPECIFIED HYDROLOGY AND HYDRAULIC MODEL INFORMATION:
==========================================================================
                    --*TIME-OF-CONCENTRATION MODEL*--

  USER SPECIFIED STORM EVENT(YEAR) =  100.00
  SPECIFIED MINIMUM PIPE SIZE(INCH) =  12.00
  SPECIFIED PERCENT OF GRADIENTS(DECIMAL) TO USE FOR FRICTION SLOPE = 0.95
  *USER-DEFINED LOGARITHMIC INTERPOLATION USED FOR RAINFALL*

  SLOPE OF INTENSITY DURATION CURVE(LOG(I;IN/HR) vs. LOG(Tc;MIN)) = 0.6000
  USER SPECIFIED 1-HOUR INTENSITY(INCH/HOUR) = 1.5500

  *ANTECEDENT MOISTURE CONDITION (AMC) III ASSUMED FOR RATIONAL METHOD*

  *USER-DEFINED STREET-SECTIONS FOR COUPLED PIPEFLOW AND STREETFLOW MODEL*
     HALF-  CROWN TO   STREET-CROSSFALL:   CURB  GUTTER-GEOMETRIES:  MANNING
     WIDTH  CROSSFALL  IN-  / OUT-/PARK-  HEIGHT  WIDTH  LIP   HIKE  FACTOR
NO.   (FT)     (FT)     SIDE / SIDE/ WAY    (FT)    (FT)  (FT)  (FT)    (n)
===  =====  =========  ==================  ======  ===== ====== ===== =======
  1   30.0     20.0    0.018/0.018/0.020   0.67    2.00 0.0313 0.167 0.0150

  GLOBAL STREET FLOW-DEPTH CONSTRAINTS:
    1. Relative Flow-Depth =  0.00 FEET
       as (Maximum Allowable Street Flow Depth) - (Top-of-Curb)
    2. (Depth)*(Velocity) Constraint =  6.0 (FT*FT/S)
  *SIZE PIPE WITH A FLOW CAPACITY GREATER THAN
   OR EQUAL TO THE UPSTREAM TRIBUTARY PIPE.*
  *USER-SPECIFIED MINIMUM TOPOGRAPHIC SLOPE ADJUSTMENT NOT SELECTED

**************************************************************************
  FLOW PROCESS FROM NODE    100.00 TO NODE    101.00 IS CODE =  21
--------------------------------------------------------------------------
  >>>>>RATIONAL METHOD INITIAL SUBAREA ANALYSIS<<<<<
  >>USE TIME-OF-CONCENTRATION NOMOGRAPH FOR INITIAL SUBAREA<<
==========================================================================
  INITIAL SUBAREA FLOW-LENGTH(FEET) =   563.00
  ELEVATION DATA: UPSTREAM(FEET) =   1394.60  DOWNSTREAM(FEET) =   1376.30

  Tc = K*[(LENGTH** 3.00)/(ELEVATION CHANGE)]**0.20
  SUBAREA ANALYSIS USED MINIMUM Tc(MIN.) =   13.121
  * 100 YEAR RAINFALL INTENSITY(INCH/HR) =  3.859
  SUBAREA Tc AND LOSS RATE DATA(AMC III):
   DEVELOPMENT TYPE/       SCS SOIL   AREA      Fp         Ap      SCS   Tc
       LAND USE             GROUP   (ACRES)  (INCH/HR)  (DECIMAL)  CN  (MIN.)
  NATURAL POOR COVER
  "OPEN BRUSH"                A        2.90      0.35      1.000    81   13.12
  SUBAREA AVERAGE PERVIOUS LOSS RATE, Fp(INCH/HR) =  0.35
  SUBAREA AVERAGE PERVIOUS AREA FRACTION, Ap =  1.000
  SUBAREA RUNOFF(CFS) =      9.15
  TOTAL AREA(ACRES) =      2.90   PEAK FLOW RATE(CFS) =      9.15

**************************************************************************
  FLOW PROCESS FROM NODE    101.00 TO NODE    102.00 IS CODE =  52
--------------------------------------------------------------------------
  >>>>>COMPUTE NATURAL VALLEY CHANNEL FLOW<<<<<
  >>>>>TRAVELTIME THRU SUBAREA<<<<<
==========================================================================
  ELEVATION DATA: UPSTREAM(FEET) =   1376.30  DOWNSTREAM(FEET) =   1358.00
  CHANNEL LENGTH THRU SUBAREA(FEET) =   560.00   CHANNEL SLOPE =  0.0327
  CHANNEL FLOW THRU SUBAREA(CFS) =      9.15
  FLOW VELOCITY(FEET/SEC) =   4.42 (PER LACFCD/RCFC&WCD HYDROLOGY MANUAL)
  TRAVEL TIME(MIN.) =   2.11   Tc(MIN.) =   15.23
  LONGEST FLOWPATH FROM NODE    100.00 TO NODE    102.00 =    1123.00 FEET.
```

```
**************************************************************************
 FLOW PROCESS FROM NODE    102.00 TO NODE    102.00 IS CODE =  81
--------------------------------------------------------------------------
 >>>>>ADDITION OF SUBAREA TO MAINLINE PEAK FLOW<<<<<
==========================================================================
 MAINLINE Tc(MIN.) =   15.23
 * 100 YEAR RAINFALL INTENSITY(INCH/HR) =  3.528
 SUBAREA LOSS RATE DATA(AMC III):
  DEVELOPMENT TYPE/       SCS SOIL   AREA      Fp         Ap      SCS
      LAND USE             GROUP   (ACRES)  (INCH/HR)  (DECIMAL)  CN
 NATURAL POOR COVER
 "OPEN BRUSH"                 A        4.50      0.35      1.000    81
 SUBAREA AVERAGE PERVIOUS LOSS RATE, Fp(INCH/HR) =  0.35
 SUBAREA AVERAGE PERVIOUS AREA FRACTION, Ap =  1.000
 SUBAREA AREA(ACRES) =    4.50      SUBAREA RUNOFF(CFS) =   12.86
 EFFECTIVE AREA(ACRES) =      7.40   AREA-AVERAGED Fm(INCH/HR) =  0.35
 AREA-AVERAGED Fp(INCH/HR) =  0.35  AREA-AVERAGED Ap =  1.00
 TOTAL AREA(ACRES) =        7.4       PEAK FLOW RATE(CFS) =      21.15
==========================================================================
 END OF STUDY SUMMARY:
 TOTAL AREA(ACRES)      =        7.4  TC(MIN.) =     15.23
 EFFECTIVE AREA(ACRES) =      7.40  AREA-AVERAGED Fm(INCH/HR)=  0.35
 AREA-AVERAGED Fp(INCH/HR) =  0.35  AREA-AVERAGED Ap = 1.000
 PEAK FLOW RATE(CFS)    =     21.15
==========================================================================
==========================================================================
 END OF RATIONAL METHOD ANALYSIS
```

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```
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                          Analysis prepared by:

                        THIENES ENGINEERING, INC.
                           14349 FIRESTONE BLVD
                           LA MIRADA, CA 90638
                               714-521-4811

 ************************** DESCRIPTION OF STUDY **************************
* TEI 36S1                                                                *
* EXISTING CONDITION                                                      *
* 100-YEAR EVENT (NODES 200-202)                                          *
 **************************************************************************

  FILE NAME: W:\36S1\EX200.DAT
  TIME/DATE OF STUDY: 09:10 01/24/2020
==========================================================================
  USER SPECIFIED HYDROLOGY AND HYDRAULIC MODEL INFORMATION:
==========================================================================
                    --*TIME-OF-CONCENTRATION MODEL*--

  USER SPECIFIED STORM EVENT(YEAR) =  100.00
  SPECIFIED MINIMUM PIPE SIZE(INCH) =  12.00
  SPECIFIED PERCENT OF GRADIENTS(DECIMAL) TO USE FOR FRICTION SLOPE = 0.95
  *USER-DEFINED LOGARITHMIC INTERPOLATION USED FOR RAINFALL*

  SLOPE OF INTENSITY DURATION CURVE(LOG(I;IN/HR) vs. LOG(Tc;MIN)) = 0.6000
  USER SPECIFIED 1-HOUR INTENSITY(INCH/HOUR) = 1.5500

  *ANTECEDENT MOISTURE CONDITION (AMC) III ASSUMED FOR RATIONAL METHOD*

  *USER-DEFINED STREET-SECTIONS FOR COUPLED PIPEFLOW AND STREETFLOW MODEL*
     HALF-  CROWN TO   STREET-CROSSFALL:   CURB  GUTTER-GEOMETRIES:  MANNING
     WIDTH  CROSSFALL  IN-  / OUT-/PARK-  HEIGHT  WIDTH  LIP   HIKE  FACTOR
NO.   (FT)     (FT)    SIDE / SIDE/ WAY    (FT)    (FT)  (FT)  (FT)    (n)
===  =====  =========  ================  ======  ===== ====== ===== =======
  1   30.0     20.0    0.018/0.018/0.020   0.67    2.00 0.0312 0.167 0.015S0

  GLOBAL STREET FLOW-DEPTH CONSTRAINTS:
    1. Relative Flow-Depth =  0.00 FEET
       as (Maximum Allowable Street Flow Depth) - (Top-of-Curb)
    2. (Depth)*(Velocity) Constraint =  6.0 (FT*FT/S)
  *SIZE PIPE WITH A FLOW CAPACITY GREATER THAN
   OR EQUAL TO THE UPSTREAM TRIBUTARY PIPE.*
  *USER-SPECIFIED MINIMUM TOPOGRAPHIC SLOPE ADJUSTMENT NOT SELECTED

**************************************************************************
  FLOW PROCESS FROM NODE    200.00 TO NODE    201.00 IS CODE =  21
--------------------------------------------------------------------------
  >>>>>RATIONAL METHOD INITIAL SUBAREA ANALYSIS<<<<<
  >>USE TIME-OF-CONCENTRATION NOMOGRAPH FOR INITIAL SUBAREA<<
==========================================================================
  INITIAL SUBAREA FLOW-LENGTH(FEET) =   803.00
  ELEVATION DATA: UPSTREAM(FEET) =   1403.00  DOWNSTREAM(FEET) =   1369.50

  Tc = K*[(LENGTH** 3.00)/(ELEVATION CHANGE)]**0.20
  SUBAREA ANALYSIS USED MINIMUM Tc(MIN.) =   14.387
  * 100 YEAR RAINFALL INTENSITY(INCH/HR) =  3.651
  SUBAREA Tc AND LOSS RATE DATA(AMC III):
   DEVELOPMENT TYPE/      SCS SOIL   AREA      Fp         Ap      SCS   Tc
       LAND USE            GROUP   (ACRES)  (INCH/HR)  (DECIMAL)  CN  (MIN.)
```

```
  NATURAL POOR COVER
  "OPEN BRUSH"                A        S.70      0.3S     1.000    81   14.39
  SUBAREA AVERAGE PERVIOUS LOSS RATE, Fp(INCH/HR) =  0.3S
  SUBAREA AVERAGE PERVIOUS AREA FRACTION, Ap =  1.000
  SUBAREA RUNOFF(CFS) =     16.92
  TOTAL AREA(ACRES) =      S.70   PEAK FLOW RATE(CFS) =     16.92

****************************************************************************
  FLOW PROCESS FROM NODE    201.00 TO NODE    202.00 IS CODE =  S2
----------------------------------------------------------------------------
  >>>>>COMPUTE NATURAL VALLEY CHANNEL FLOW<<<<<
  >>>>>TRAVELTIME THRU SUBAREA<<<<<
============================================================================
  ELEVATION DATA: UPSTREAM(FEET) =   1369.S0  DOWNSTREAM(FEET) =   13S1.90
  CHANNEL LENGTH THRU SUBAREA(FEET) =   691.00   CHANNEL SLOPE =  0.02SS
  CHANNEL FLOW THRU SUBAREA(CFS) =      16.92
  FLOW VELOCITY(FEET/SEC) =   4.S7 (PER LACFCD/RCFC&WCD HYDROLOGY MANUAL)
  TRAVEL TIME(MIN.) =   2.S2   Tc(MIN.) =   16.91
  LONGEST FLOWPATH FROM NODE    200.00 TO NODE    202.00 =    1494.00 FEET.

****************************************************************************
  FLOW PROCESS FROM NODE    202.00 TO NODE    202.00 IS CODE =  81
----------------------------------------------------------------------------
  >>>>>ADDITION OF SUBAREA TO MAINLINE PEAK FLOW<<<<<
============================================================================
  MAINLINE Tc(MIN.) =   16.91
  * 100 YEAR RAINFALL INTENSITY(INCH/HR) =  3.314
  SUBAREA LOSS RATE DATA(AMC III):
   DEVELOPMENT TYPE/       SCS SOIL   AREA      Fp         Ap      SCS
       LAND USE             GROUP   (ACRES)  (INCH/HR)  (DECIMAL)  CN
  NATURAL POOR COVER
  "OPEN BRUSH"                A        3.1S      0.3S     1.000    81
  SUBAREA AVERAGE PERVIOUS LOSS RATE, Fp(INCH/HR) =  0.3S
  SUBAREA AVERAGE PERVIOUS AREA FRACTION, Ap =  1.000
  SUBAREA AREA(ACRES) =     3.1S      SUBAREA RUNOFF(CFS) =     8.40
  EFFECTIVE AREA(ACRES) =      8.8S   AREA-AVERAGED Fm(INCH/HR) =  0.3S
  AREA-AVERAGED Fp(INCH/HR) =  0.3S  AREA-AVERAGED Ap =  1.00
  TOTAL AREA(ACRES) =        8.9       PEAK FLOW RATE(CFS) =      23.S9
============================================================================
  END OF STUDY SUMMARY:
  TOTAL AREA(ACRES)     =        8.9  TC(MIN.) =     16.91
  EFFECTIVE AREA(ACRES) =      8.8S  AREA-AVERAGED Fm(INCH/HR)=  0.3S
  AREA-AVERAGED Fp(INCH/HR) =  0.3S  AREA-AVERAGED Ap = 1.000
  PEAK FLOW RATE(CFS)   =      23.S9
============================================================================
============================================================================
  END OF RATIONAL METHOD ANALYSIS
```

```
****************************************************************************
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                        Analysis prepared by:



 ************************** DESCRIPTION OF STUDY **************************
* TEI 3651                                                                *
* EXISTING CONDITION                                                      *
* 100-YEAR EVENT (NODES 300-303)                                          *
 ****************************************************************************

  FILE NAME: W:\3651\EX300.DAT
  TIME/DATE OF STUDY: 08:51 05/07/2018
============================================================================
  USER SPECIFIED HYDROLOGY AND HYDRAULIC MODEL INFORMATION:
============================================================================
                    --*TIME-OF-CONCENTRATION MODEL*--

  USER SPECIFIED STORM EVENT(YEAR) =  100.00
  SPECIFIED MINIMUM PIPE SIZE(INCH) =  12.00
  SPECIFIED PERCENT OF GRADIENTS(DECIMAL) TO USE FOR FRICTION SLOPE = 0.95
  *USER-DEFINED LOGARITHMIC INTERPOLATION USED FOR RAINFALL*

  SLOPE OF INTENSITY DURATION CURVE(LOG(I;IN/HR) vs. LOG(Tc;MIN)) = 0.6000
  USER SPECIFIED 1-HOUR INTENSITY(INCH/HOUR) = 1.5500

  *ANTECEDENT MOISTURE CONDITION (AMC) III ASSUMED FOR RATIONAL METHOD*

  *USER-DEFINED STREET-SECTIONS FOR COUPLED PIPEFLOW AND STREETFLOW MODEL*
     HALF-  CROWN TO   STREET-CROSSFALL:   CURB  GUTTER-GEOMETRIES:  MANNING
     WIDTH  CROSSFALL  IN-  / OUT-/PARK-  HEIGHT  WIDTH  LIP   HIKE  FACTOR
NO.   (FT)     (FT)    SIDE / SIDE/ WAY    (FT)    (FT)  (FT)  (FT)    (n)
===  =====  =========  ==================  ======  ===== ====== ===== =======
  1   30.0     20.0    0.018/0.018/0.020   0.67    2.00 0.0312 0.167 0.0150

  GLOBAL STREET FLOW-DEPTH CONSTRAINTS:
    1. Relative Flow-Depth =  0.00 FEET
       as (Maximum Allowable Street Flow Depth) - (Top-of-Curb)
    2. (Depth)*(Velocity) Constraint =  6.0 (FT*FT/S)
  *SIZE PIPE WITH A FLOW CAPACITY GREATER THAN
   OR EQUAL TO THE UPSTREAM TRIBUTARY PIPE.*
  *USER-SPECIFIED MINIMUM TOPOGRAPHIC SLOPE ADJUSTMENT NOT SELECTED

****************************************************************************
  FLOW PROCESS FROM NODE    300.00 TO NODE    301.00 IS CODE =  21
----------------------------------------------------------------------------
  >>>>>RATIONAL METHOD INITIAL SUBAREA ANALYSIS<<<<<
  >>USE TIME-OF-CONCENTRATION NOMOGRAPH FOR INITIAL SUBAREA<<
============================================================================
  INITIAL SUBAREA FLOW-LENGTH(FEET) =   585.00
  ELEVATION DATA: UPSTREAM(FEET) =   1399.00  DOWNSTREAM(FEET) =   1383.00

  Tc = K*[(LENGTH** 3.00)/(ELEVATION CHANGE)]**0.20
  SUBAREA ANALYSIS USED MINIMUM Tc(MIN.) =   13.792
  * 100 YEAR RAINFALL INTENSITY(INCH/HR) =  3.745
  SUBAREA Tc AND LOSS RATE DATA(AMC III):
   DEVELOPMENT TYPE/       SCS SOIL   AREA      Fp         Ap      SCS   Tc
       LAND USE            GROUP   (ACRES)  (INCH/HR)  (DECIMAL)  CN  (MIN.)
  NATURAL POOR COVER
  "BARREN"                   A        5.85      0.18      1.000    93   13.79
  SUBAREA AVERAGE PERVIOUS LOSS RATE, Fp(INCH/HR) =  0.18
  SUBAREA AVERAGE PERVIOUS AREA FRACTION, Ap =  1.000
  SUBAREA RUNOFF(CFS) =     18.77
  TOTAL AREA(ACRES) =      5.85   PEAK FLOW RATE(CFS) =     18.77

****************************************************************************
  FLOW PROCESS FROM NODE    301.00 TO NODE    302.00 IS CODE =  52
----------------------------------------------------------------------------
  >>>>>COMPUTE NATURAL VALLEY CHANNEL FLOW<<<<<
  >>>>>TRAVELTIME THRU SUBAREA<<<<<
============================================================================
  ELEVATION DATA: UPSTREAM(FEET) =   1383.00  DOWNSTREAM(FEET) =   1367.90
  CHANNEL LENGTH THRU SUBAREA(FEET) =   341.00   CHANNEL SLOPE =  0.0443
  CHANNEL FLOW THRU SUBAREA(CFS) =      18.77
  FLOW VELOCITY(FEET/SEC) =   6.20 (PER LACFCD/RCFC&WCD HYDROLOGY MANUAL)
  TRAVEL TIME(MIN.) =   0.92   Tc(MIN.) =   14.71
  LONGEST FLOWPATH FROM NODE    300.00 TO NODE    302.00 =     926.00 FEET.
```

```
****************************************************************************
  FLOW PROCESS FROM NODE     302.00 TO NODE     302.00 IS CODE =  81
----------------------------------------------------------------------------
  >>>>>ADDITION OF SUBAREA TO MAINLINE PEAK FLOW<<<<<
============================================================================
  MAINLINE Tc(MIN.) =   14.71
  * 100 YEAR RAINFALL INTENSITY(INCH/HR) =  3.603
  SUBAREA LOSS RATE DATA(AMC III):
   DEVELOPMENT TYPE/       SCS SOIL   AREA      Fp         Ap      SCS
       LAND USE             GROUP   (ACRES)  (INCH/HR)  (DECIMAL)  CN
  NATURAL POOR COVER
  "BARREN"                    A        5.35      0.18      1.000    93
  SUBAREA AVERAGE PERVIOUS LOSS RATE, Fp(INCH/HR) =  0.18
  SUBAREA AVERAGE PERVIOUS AREA FRACTION, Ap =  1.000
  SUBAREA AREA(ACRES) =     5.35      SUBAREA RUNOFF(CFS) =   16.48
  EFFECTIVE AREA(ACRES) =    11.20   AREA-AVERAGED Fm(INCH/HR) =  0.18
  AREA-AVERAGED Fp(INCH/HR) =  0.18  AREA-AVERAGED Ap =  1.00
  TOTAL AREA(ACRES) =       11.2       PEAK FLOW RATE(CFS) =      34.50

****************************************************************************
  FLOW PROCESS FROM NODE     302.00 TO NODE     303.00 IS CODE =  52
----------------------------------------------------------------------------
  >>>>>COMPUTE NATURAL VALLEY CHANNEL FLOW<<<<<
  >>>>>TRAVELTIME THRU SUBAREA<<<<<
============================================================================
  ELEVATION DATA: UPSTREAM(FEET) =   1367.90  DOWNSTREAM(FEET) =   1351.00
  CHANNEL LENGTH THRU SUBAREA(FEET) =   449.00   CHANNEL SLOPE =  0.0376
  CHANNEL FLOW THRU SUBAREA(CFS) =      34.50
  FLOW VELOCITY(FEET/SEC) =   6.76 (PER LACFCD/RCFC&WCD HYDROLOGY MANUAL)
  TRAVEL TIME(MIN.) =   1.11   Tc(MIN.) =   15.82
  LONGEST FLOWPATH FROM NODE    300.00 TO NODE    303.00 =    1375.00 FEET.

****************************************************************************
  FLOW PROCESS FROM NODE     303.00 TO NODE     303.00 IS CODE =  81
----------------------------------------------------------------------------
  >>>>>ADDITION OF SUBAREA TO MAINLINE PEAK FLOW<<<<<
============================================================================
  MAINLINE Tc(MIN.) =   15.82
  * 100 YEAR RAINFALL INTENSITY(INCH/HR) =  3.449
  SUBAREA LOSS RATE DATA(AMC III):
   DEVELOPMENT TYPE/       SCS SOIL   AREA      Fp         Ap      SCS
       LAND USE             GROUP   (ACRES)  (INCH/HR)  (DECIMAL)  CN
  NATURAL POOR COVER
  "BARREN"                    A        7.00      0.18      1.000    93
  SUBAREA AVERAGE PERVIOUS LOSS RATE, Fp(INCH/HR) =  0.18
  SUBAREA AVERAGE PERVIOUS AREA FRACTION, Ap =  1.000
  SUBAREA AREA(ACRES) =     7.00      SUBAREA RUNOFF(CFS) =   20.60
  EFFECTIVE AREA(ACRES) =    18.20   AREA-AVERAGED Fm(INCH/HR) =  0.18
  AREA-AVERAGED Fp(INCH/HR) =  0.18  AREA-AVERAGED Ap =  1.00
  TOTAL AREA(ACRES) =       18.2       PEAK FLOW RATE(CFS) =      53.55
============================================================================
  END OF STUDY SUMMARY:
  TOTAL AREA(ACRES)      =       18.2  TC(MIN.) =     15.82
  EFFECTIVE AREA(ACRES) =     18.20  AREA-AVERAGED Fm(INCH/HR)=  0.18
  AREA-AVERAGED Fp(INCH/HR) =  0.18  AREA-AVERAGED Ap = 1.000
  PEAK FLOW RATE(CFS)    =      53.55
============================================================================
============================================================================
  END OF RATIONAL METHOD ANALYSIS
```

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```
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                          Analysis prepared by:

                        THIENES ENGINEERING, INC.
                          14349 FIRESTONE BLVD
                          LA MIRADA, CA 90638
                              714-521-4811

 ************************* DESCRIPTION OF STUDY *************************
* TEI 36S1                                                              *
* EXISTING CONDITION                                                    *
* 100-YEAR EVENT (NODES 400-402)                                        *
 **************************************************************************

  FILE NAME: W:\36S1\EX400.DAT
  TIME/DATE OF STUDY: 09:11 01/24/2020
==========================================================================
  USER SPECIFIED HYDROLOGY AND HYDRAULIC MODEL INFORMATION:
==========================================================================
                    --*TIME-OF-CONCENTRATION MODEL*--

  USER SPECIFIED STORM EVENT(YEAR) =  100.00
  SPECIFIED MINIMUM PIPE SIZE(INCH) =  12.00
  SPECIFIED PERCENT OF GRADIENTS(DECIMAL) TO USE FOR FRICTION SLOPE = 0.95
  *USER-DEFINED LOGARITHMIC INTERPOLATION USED FOR RAINFALL*

  SLOPE OF INTENSITY DURATION CURVE(LOG(I;IN/HR) vs. LOG(Tc;MIN)) = 0.6000
  USER SPECIFIED 1-HOUR INTENSITY(INCH/HOUR) = 1.5500

  *ANTECEDENT MOISTURE CONDITION (AMC) III ASSUMED FOR RATIONAL METHOD*

  *USER-DEFINED STREET-SECTIONS FOR COUPLED PIPEFLOW AND STREETFLOW MODEL*
     HALF-  CROWN TO   STREET-CROSSFALL:   CURB  GUTTER-GEOMETRIES:  MANNING
     WIDTH  CROSSFALL  IN-  / OUT-/PARK-  HEIGHT  WIDTH  LIP   HIKE  FACTOR
NO.   (FT)     (FT)    SIDE / SIDE/ WAY    (FT)    (FT)  (FT)  (FT)    (n)
===  =====  =========  =================  ======  ===== ====== ===== =======
  1   30.0     20.0    0.018/0.018/0.020   0.67    2.00 0.0312 0.167 0.0150

  GLOBAL STREET FLOW-DEPTH CONSTRAINTS:
    1. Relative Flow-Depth =  0.00 FEET
       as (Maximum Allowable Street Flow Depth) - (Top-of-Curb)
    2. (Depth)*(Velocity) Constraint =  6.0 (FT*FT/S)
  *SIZE PIPE WITH A FLOW CAPACITY GREATER THAN
   OR EQUAL TO THE UPSTREAM TRIBUTARY PIPE.*
  *USER-SPECIFIED MINIMUM TOPOGRAPHIC SLOPE ADJUSTMENT NOT SELECTED

**************************************************************************
  FLOW PROCESS FROM NODE    400.00 TO NODE    401.00 IS CODE =  21
--------------------------------------------------------------------------
  >>>>>RATIONAL METHOD INITIAL SUBAREA ANALYSIS<<<<<
  >>USE TIME-OF-CONCENTRATION NOMOGRAPH FOR INITIAL SUBAREA<<
==========================================================================
  INITIAL SUBAREA FLOW-LENGTH(FEET) =   598.00
  ELEVATION DATA: UPSTREAM(FEET) =   1399.70  DOWNSTREAM(FEET) =   1377.50

  Tc = K*[(LENGTH** 3.00)/(ELEVATION CHANGE)]**0.20
  SUBAREA ANALYSIS USED MINIMUM Tc(MIN.) =   13.089
  * 100 YEAR RAINFALL INTENSITY(INCH/HR) =  3.864
  SUBAREA Tc AND LOSS RATE DATA(AMC III):
   DEVELOPMENT TYPE/      SCS SOIL   AREA      Fp         Ap      SCS   Tc
       LAND USE            GROUP   (ACRES)  (INCH/HR)  (DECIMAL)  CN  (MIN.)
```

```
 NATURAL POOR COVER
 "BARREN"                    A        8.60      0.18     1.000    93   13.09
 SUBAREA AVERAGE PERVIOUS LOSS RATE, Fp(INCH/HR) =  0.18
 SUBAREA AVERAGE PERVIOUS AREA FRACTION, Ap =  1.000
 SUBAREA RUNOFF(CFS) =     28.52
 TOTAL AREA(ACRES) =      8.60   PEAK FLOW RATE(CFS) =     28.52

****************************************************************************
 FLOW PROCESS FROM NODE    401.00 TO NODE    402.00 IS CODE =  52
----------------------------------------------------------------------------
 >>>>>COMPUTE NATURAL VALLEY CHANNEL FLOW<<<<<
 >>>>>TRAVELTIME THRU SUBAREA<<<<<
============================================================================
 ELEVATION DATA: UPSTREAM(FEET) =   1377.50  DOWNSTREAM(FEET) =   1348.40
 CHANNEL LENGTH THRU SUBAREA(FEET) =   804.00   CHANNEL SLOPE =  0.0362
 CHANNEL FLOW THRU SUBAREA(CFS) =      28.52
 FLOW VELOCITY(FEET/SEC) =   6.28 (PER LACFCD/RCFC&WCD HYDROLOGY MANUAL)
 TRAVEL TIME(MIN.) =   2.13   Tc(MIN.) =   15.22
 LONGEST FLOWPATH FROM NODE    400.00 TO NODE    402.00 =    1402.00 FEET.

****************************************************************************
 FLOW PROCESS FROM NODE    402.00 TO NODE    402.00 IS CODE =  81
----------------------------------------------------------------------------
 >>>>>ADDITION OF SUBAREA TO MAINLINE PEAK FLOW<<<<<
============================================================================
 MAINLINE Tc(MIN.) =   15.22
 * 100 YEAR RAINFALL INTENSITY(INCH/HR) =  3.30
 SUBAREA LOSS RATE DATA(AMC III):
  DEVELOPMENT TYPE/       SCS SOIL   AREA      Fp         Ap      SCS
      LAND USE             GROUP   (ACRES)  (INCH/HR)  (DECIMAL)  CN
 NATURAL POOR COVER
 "BARREN"                    A        7.20      0.18     1.000    93
 SUBAREA AVERAGE PERVIOUS LOSS RATE, Fp(INCH/HR) =  0.18
 SUBAREA AVERAGE PERVIOUS AREA FRACTION, Ap =  1.000
 SUBAREA AREA(ACRES) =     7.20      SUBAREA RUNOFF(CFS) =   21.71
 EFFECTIVE AREA(ACRES) =     15.80   AREA-AVERAGED Fm(INCH/HR) =  0.18
 AREA-AVERAGED Fp(INCH/HR) =  0.18  AREA-AVERAGED Ap =  1.00
 TOTAL AREA(ACRES) =       15.8       PEAK FLOW RATE(CFS) =      47.63
============================================================================
 END OF STUDY SUMMARY:
 TOTAL AREA(ACRES)     =       15.8  TC(MIN.) =     15.22
 EFFECTIVE AREA(ACRES) =     15.80  AREA-AVERAGED Fm(INCH/HR)=  0.18
 AREA-AVERAGED Fp(INCH/HR) =  0.18  AREA-AVERAGED Ap = 1.000
 PEAK FLOW RATE(CFS)   =      47.63
============================================================================
============================================================================
 END OF RATIONAL METHOD ANALYSIS
```

PROPOSED CONDITION

```
**************************************************************************
            RATIONAL METHOD HYDROLOGY COMPUTER PROGRAM PACKAGE
          (Reference: 1986 SAN BERNARDINO CO. HYDROLOGY CRITERION)
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                          Analysis prepared by:

                        THIENES ENGINEERING, INC.
                           14349 FIRESTONE BLVD
                           LA MIRADA, CA 90638
                               714-521-4811

 ************************* DESCRIPTION OF STUDY *************************
* TEI JOB NO 36S1                                                       *
* 100-YEAR STORM EVENT                                                  *
* PROPOSED CONDITION (NODES 100-304)                                    *
 *************************************************************************

  FILE NAME: W:\36S1\PRELIM\100P.DAT
  TIME/DATE OF STUDY: 13:27 01/24/2020
==========================================================================
  USER SPECIFIED HYDROLOGY AND HYDRAULIC MODEL INFORMATION:
==========================================================================
                    --*TIME-OF-CONCENTRATION MODEL*--

  USER SPECIFIED STORM EVENT(YEAR) =  100.00
  SPECIFIED MINIMUM PIPE SIZE(INCH) =  12.00
  SPECIFIED PERCENT OF GRADIENTS(DECIMAL) TO USE FOR FRICTION SLOPE = 0.95
  *USER-DEFINED LOGARITHMIC INTERPOLATION USED FOR RAINFALL*

  SLOPE OF INTENSITY DURATION CURVE(LOG(I;IN/HR) vs. LOG(Tc;MIN)) = 0.6000
  USER SPECIFIED 1-HOUR INTENSITY(INCH/HOUR) = 1.5500

  *ANTECEDENT MOISTURE CONDITION (AMC) III ASSUMED FOR RATIONAL METHOD*

  *USER-DEFINED STREET-SECTIONS FOR COUPLED PIPEFLOW AND STREETFLOW MODEL*
     HALF-  CROWN TO   STREET-CROSSFALL:   CURB  GUTTER-GEOMETRIES:  MANNING
     WIDTH  CROSSFALL  IN-  / OUT-/PARK-  HEIGHT  WIDTH  LIP   HIKE  FACTOR
NO.   (FT)     (FT)    SIDE / SIDE/ WAY    (FT)    (FT)  (FT)  (FT)    (n)
===  =====  =========  =================  ======  ===== ====== ===== =======
  1   30.0     20.0    0.018/0.018/0.020   0.67    2.00 0.0312 0.167 0.015O

  GLOBAL STREET FLOW-DEPTH CONSTRAINTS:
    1. Relative Flow-Depth =  0.00 FEET
       as (Maximum Allowable Street Flow Depth) - (Top-of-Curb)
    2. (Depth)*(Velocity) Constraint =  6.0 (FT*FT/S)
  *SIZE PIPE WITH A FLOW CAPACITY GREATER THAN
   OR EQUAL TO THE UPSTREAM TRIBUTARY PIPE.*
  *USER-SPECIFIED MINIMUM TOPOGRAPHIC SLOPE ADJUSTMENT NOT SELECTED

**************************************************************************
  FLOW PROCESS FROM NODE    100.00 TO NODE    101.00 IS CODE =  21
--------------------------------------------------------------------------
  >>>>>RATIONAL METHOD INITIAL SUBAREA ANALYSIS<<<<<
  >>USE TIME-OF-CONCENTRATION NOMOGRAPH FOR INITIAL SUBAREA<<
==========================================================================
  INITIAL SUBAREA FLOW-LENGTH(FEET) =   381.00
  ELEVATION DATA: UPSTREAM(FEET) =   1397.20  DOWNSTREAM(FEET) =   1386.94

  Tc = K*[(LENGTH** 3.00)/(ELEVATION CHANGE)]**0.20
  SUBAREA ANALYSIS USED MINIMUM Tc(MIN.) =    6.748
  * 100 YEAR RAINFALL INTENSITY(INCH/HR) =  5.750
  SUBAREA Tc AND LOSS RATE DATA(AMC III):
   DEVELOPMENT TYPE/       SCS SOIL   AREA      Fp         Ap      SCS   Tc
       LAND USE             GROUP   (ACRES)  (INCH/HR)  (DECIMAL)  CN  (MIN.)
```

```
  COMMERCIAL                  A        1.2S      0.74     0.100    S2     6.7S
  SUBAREA AVERAGE PERVIOUS LOSS RATE, Fp(INCH/HR) =  0.74
  SUBAREA AVERAGE PERVIOUS AREA FRACTION, Ap =  0.100
  SUBAREA RUNOFF(CFS) =      6.39
  TOTAL AREA(ACRES) =      1.2S   PEAK FLOW RATE(CFS) =      6.39

****************************************************************************
  FLOW PROCESS FROM NODE    101.00 TO NODE    102.00 IS CODE =  31
----------------------------------------------------------------------------
  >>>>>COMPUTE PIPE-FLOW TRAVEL TIME THRU SUBAREA<<<<<
  >>>>>USING COMPUTER-ESTIMATED PIPESIZE (NON-PRESSURE FLOW)<<<<<
============================================================================
  ELEVATION DATA: UPSTREAM(FEET) =  1382.94  DOWNSTREAM(FEET) =  1376.94
  FLOW LENGTH(FEET) =   200.00   MANNING'S N =  0.012
  DEPTH OF FLOW IN  12.0 INCH PIPE IS   9.6 INCHES
  PIPE-FLOW VELOCITY(FEET/SEC.) =   9.4S
  ESTIMATED PIPE DIAMETER(INCH) =  12.00    NUMBER OF PIPES =   1
  PIPE-FLOW(CFS) =       6.39
  PIPE TRAVEL TIME(MIN.) =   0.3S    Tc(MIN.) =    7.10
  LONGEST FLOWPATH FROM NODE    100.00 TO NODE    102.00 =     S81.00 FEET.

****************************************************************************
  FLOW PROCESS FROM NODE    102.00 TO NODE    102.00 IS CODE =  81
----------------------------------------------------------------------------
  >>>>>ADDITION OF SUBAREA TO MAINLINE PEAK FLOW<<<<<
============================================================================
  MAINLINE Tc(MIN.) =    7.10
  * 100 YEAR RAINFALL INTENSITY(INCH/HR) =  S.S77
  SUBAREA LOSS RATE DATA(AMC III):
   DEVELOPMENT TYPE/       SCS SOIL   AREA      Fp         Ap      SCS
       LAND USE             GROUP   (ACRES)  (INCH/HR)  (DECIMAL)  CN
  COMMERCIAL                  A        1.40      0.74     0.100    S2
  SUBAREA AVERAGE PERVIOUS LOSS RATE, Fp(INCH/HR) =  0.74
  SUBAREA AVERAGE PERVIOUS AREA FRACTION, Ap =  0.100
  SUBAREA AREA(ACRES) =    1.40      SUBAREA RUNOFF(CFS) =    6.93
  EFFECTIVE AREA(ACRES) =      2.6S   AREA-AVERAGED Fm(INCH/HR) =  0.07
  AREA-AVERAGED Fp(INCH/HR) =  0.74  AREA-AVERAGED Ap =  0.10
  TOTAL AREA(ACRES) =        2.7       PEAK FLOW RATE(CFS) =      13.13

****************************************************************************
  FLOW PROCESS FROM NODE    102.00 TO NODE    103.00 IS CODE =  31
----------------------------------------------------------------------------
  >>>>>COMPUTE PIPE-FLOW TRAVEL TIME THRU SUBAREA<<<<<
  >>>>>USING COMPUTER-ESTIMATED PIPESIZE (NON-PRESSURE FLOW)<<<<<
============================================================================
  ELEVATION DATA: UPSTREAM(FEET) =  1376.94  DOWNSTREAM(FEET) =  1371.S4
  FLOW LENGTH(FEET) =   180.00   MANNING'S N =  0.012
  DEPTH OF FLOW IN  18.0 INCH PIPE IS  10.9 INCHES
  PIPE-FLOW VELOCITY(FEET/SEC.) =  11.71
  ESTIMATED PIPE DIAMETER(INCH) =  18.00    NUMBER OF PIPES =   1
  PIPE-FLOW(CFS) =      13.13
  PIPE TRAVEL TIME(MIN.) =   0.26    Tc(MIN.) =    7.36
  LONGEST FLOWPATH FROM NODE    100.00 TO NODE    103.00 =     761.00 FEET.

****************************************************************************
  FLOW PROCESS FROM NODE    103.00 TO NODE    103.00 IS CODE =  81
----------------------------------------------------------------------------
  >>>>>ADDITION OF SUBAREA TO MAINLINE PEAK FLOW<<<<<
============================================================================
  MAINLINE Tc(MIN.) =    7.36
  * 100 YEAR RAINFALL INTENSITY(INCH/HR) =  S.460
  SUBAREA LOSS RATE DATA(AMC III):
   DEVELOPMENT TYPE/       SCS SOIL   AREA      Fp         Ap      SCS
       LAND USE             GROUP   (ACRES)  (INCH/HR)  (DECIMAL)  CN
  COMMERCIAL                  A        1.5S      0.74     0.100    S2
  SUBAREA AVERAGE PERVIOUS LOSS RATE, Fp(INCH/HR) =  0.74
  SUBAREA AVERAGE PERVIOUS AREA FRACTION, Ap =  0.100
```

```
 SUBAREA AREA(ACRES) =    1.55      SUBAREA RUNOFF(CFS) =    7.51
 EFFECTIVE AREA(ACRES) =      4.20   AREA-AVERAGED Fm(INCH/HR) =  0.07
 AREA-AVERAGED Fp(INCH/HR) =  0.74  AREA-AVERAGED Ap =  0.10
 TOTAL AREA(ACRES) =        4.2       PEAK FLOW RATE(CFS) =      20.36

****************************************************************************
 FLOW PROCESS FROM NODE    103.00 TO NODE    104.00 IS CODE =  31
----------------------------------------------------------------------------
 >>>>>COMPUTE PIPE-FLOW TRAVEL TIME THRU SUBAREA<<<<<
 >>>>>USING COMPUTER-ESTIMATED PIPESIZE (NON-PRESSURE FLOW)<<<<<
============================================================================
 ELEVATION DATA: UPSTREAM(FEET) =  1371.54  DOWNSTREAM(FEET) =  1370.76
 FLOW LENGTH(FEET) =    26.00   MANNING'S N =  0.012
 DEPTH OF FLOW IN  21.0 INCH PIPE IS  13.0 INCHES
 PIPE-FLOW VELOCITY(FEET/SEC.) =  13.05
 ESTIMATED PIPE DIAMETER(INCH) =  21.00    NUMBER OF PIPES =   1
 PIPE-FLOW(CFS) =      20.36
 PIPE TRAVEL TIME(MIN.) =   0.03    Tc(MIN.) =    7.39
 LONGEST FLOWPATH FROM NODE    100.00 TO NODE    104.00 =     787.00 FEET.

****************************************************************************
 FLOW PROCESS FROM NODE    104.00 TO NODE    104.00 IS CODE =  81
----------------------------------------------------------------------------
 >>>>>ADDITION OF SUBAREA TO MAINLINE PEAK FLOW<<<<<
============================================================================
 MAINLINE Tc(MIN.) =    7.39
 * 100 YEAR RAINFALL INTENSITY(INCH/HR) =  5.445
 SUBAREA LOSS RATE DATA(AMC III):
  DEVELOPMENT TYPE/       SCS SOIL   AREA      Fp         Ap      SCS
      LAND USE             GROUP   (ACRES)  (INCH/HR)  (DECIMAL)  CN
 COMMERCIAL                  A        1.05      0.74      0.100    52
 SUBAREA AVERAGE PERVIOUS LOSS RATE, Fp(INCH/HR) =  0.74
 SUBAREA AVERAGE PERVIOUS AREA FRACTION, Ap =  0.100
 SUBAREA AREA(ACRES) =    1.05      SUBAREA RUNOFF(CFS) =    5.08
 EFFECTIVE AREA(ACRES) =      5.25   AREA-AVERAGED Fm(INCH/HR) =  0.07
 AREA-AVERAGED Fp(INCH/HR) =  0.74  AREA-AVERAGED Ap =  0.10
 TOTAL AREA(ACRES) =        5.2       PEAK FLOW RATE(CFS) =      25.38

****************************************************************************
 FLOW PROCESS FROM NODE    104.00 TO NODE    113.00 IS CODE =  31
----------------------------------------------------------------------------
 >>>>>COMPUTE PIPE-FLOW TRAVEL TIME THRU SUBAREA<<<<<
 >>>>>USING COMPUTER-ESTIMATED PIPESIZE (NON-PRESSURE FLOW)<<<<<
============================================================================
 ELEVATION DATA: UPSTREAM(FEET) =  1370.76  DOWNSTREAM(FEET) =  1363.35
 FLOW LENGTH(FEET) =   247.00   MANNING'S N =  0.012
 DEPTH OF FLOW IN  21.0 INCH PIPE IS  15.2 INCHES
 PIPE-FLOW VELOCITY(FEET/SEC.) =  13.59
 ESTIMATED PIPE DIAMETER(INCH) =  21.00    NUMBER OF PIPES =   1
 PIPE-FLOW(CFS) =      25.38
 PIPE TRAVEL TIME(MIN.) =   0.30    Tc(MIN.) =    7.69
 LONGEST FLOWPATH FROM NODE    100.00 TO NODE    113.00 =    1034.00 FEET.

****************************************************************************
 FLOW PROCESS FROM NODE    113.00 TO NODE    113.00 IS CODE =   1
----------------------------------------------------------------------------
 >>>>>DESIGNATE INDEPENDENT STREAM FOR CONFLUENCE<<<<<
============================================================================
 TOTAL NUMBER OF STREAMS =  2
 CONFLUENCE VALUES USED FOR INDEPENDENT STREAM  1 ARE:
 TIME OF CONCENTRATION(MIN.) =    7.69
 RAINFALL INTENSITY(INCH/HR) =   5.32
 AREA-AVERAGED Fm(INCH/HR) =  0.07
 AREA-AVERAGED Fp(INCH/HR) =  0.74
 AREA-AVERAGED Ap =  0.10
 EFFECTIVE STREAM AREA(ACRES) =       5.25
 TOTAL STREAM AREA(ACRES) =       5.25
```

```
 PEAK FLOW RATE(CFS) AT CONFLUENCE =      25.38

****************************************************************************
 FLOW PROCESS FROM NODE    110.00 TO NODE    111.00 IS CODE =  21
----------------------------------------------------------------------------
 >>>>>RATIONAL METHOD INITIAL SUBAREA ANALYSIS<<<<<
 >>USE TIME-OF-CONCENTRATION NOMOGRAPH FOR INITIAL SUBAREA<<
============================================================================
 INITIAL SUBAREA FLOW-LENGTH(FEET) =   495.00
 ELEVATION DATA: UPSTREAM(FEET) =   1381.19  DOWNSTREAM(FEET) =   1368.38

 Tc = K*[(LENGTH** 3.00)/(ELEVATION CHANGE)]**0.20
 SUBAREA ANALYSIS USED MINIMUM Tc(MIN.) =    7.553
 * 100 YEAR RAINFALL INTENSITY(INCH/HR) =  5.375
 SUBAREA Tc AND LOSS RATE DATA(AMC III):
  DEVELOPMENT TYPE/       SCS SOIL   AREA      Fp         Ap      SCS   Tc
      LAND USE             GROUP   (ACRES)  (INCH/HR)  (DECIMAL)  CN  (MIN.)
 COMMERCIAL                  A        3.00      0.74      0.100    52    7.55
 SUBAREA AVERAGE PERVIOUS LOSS RATE, Fp(INCH/HR) =  0.74
 SUBAREA AVERAGE PERVIOUS AREA FRACTION, Ap =  0.100
 SUBAREA RUNOFF(CFS) =     14.31
 TOTAL AREA(ACRES) =      3.00   PEAK FLOW RATE(CFS) =     14.31

****************************************************************************
 FLOW PROCESS FROM NODE    111.00 TO NODE    112.00 IS CODE =  31
----------------------------------------------------------------------------
 >>>>>COMPUTE PIPE-FLOW TRAVEL TIME THRU SUBAREA<<<<<
 >>>>>USING COMPUTER-ESTIMATED PIPESIZE (NON-PRESSURE FLOW)<<<<<
============================================================================
 ELEVATION DATA: UPSTREAM(FEET) =  1364.38  DOWNSTREAM(FEET) =  1364.12
 FLOW LENGTH(FEET) =    33.00   MANNING'S N =  0.012
 DEPTH OF FLOW IN  21.0 INCH PIPE IS  16.5 INCHES
 PIPE-FLOW VELOCITY(FEET/SEC.) =   7.04
 ESTIMATED PIPE DIAMETER(INCH) =  21.00    NUMBER OF PIPES =   1
 PIPE-FLOW(CFS) =      14.31
 PIPE TRAVEL TIME(MIN.) =   0.08    Tc(MIN.) =    7.63
 LONGEST FLOWPATH FROM NODE    110.00 TO NODE    112.00 =     528.00 FEET.

****************************************************************************
 FLOW PROCESS FROM NODE    112.00 TO NODE    112.00 IS CODE =  81
----------------------------------------------------------------------------
 >>>>>ADDITION OF SUBAREA TO MAINLINE PEAK FLOW<<<<<
============================================================================
 MAINLINE Tc(MIN.) =    7.63
 * 100 YEAR RAINFALL INTENSITY(INCH/HR) =  5.342
 SUBAREA LOSS RATE DATA(AMC III):
  DEVELOPMENT TYPE/       SCS SOIL   AREA      Fp         Ap      SCS
      LAND USE             GROUP   (ACRES)  (INCH/HR)  (DECIMAL)  CN
 COMMERCIAL                  A        1.10      0.74      0.100    52
 SUBAREA AVERAGE PERVIOUS LOSS RATE, Fp(INCH/HR) =  0.74
 SUBAREA AVERAGE PERVIOUS AREA FRACTION, Ap =  0.100
 SUBAREA AREA(ACRES) =    1.10      SUBAREA RUNOFF(CFS) =    5.21
 EFFECTIVE AREA(ACRES) =      4.10   AREA-AVERAGED Fm(INCH/HR) =  0.07
 AREA-AVERAGED Fp(INCH/HR) =  0.74  AREA-AVERAGED Ap =  0.10
 TOTAL AREA(ACRES) =        4.1       PEAK FLOW RATE(CFS) =      19.44

****************************************************************************
 FLOW PROCESS FROM NODE    112.00 TO NODE    113.00 IS CODE =  31
----------------------------------------------------------------------------
 >>>>>COMPUTE PIPE-FLOW TRAVEL TIME THRU SUBAREA<<<<<
 >>>>>USING COMPUTER-ESTIMATED PIPESIZE (NON-PRESSURE FLOW)<<<<<
============================================================================
 ELEVATION DATA: UPSTREAM(FEET) =  1364.12  DOWNSTREAM(FEET) =  1361.59
 FLOW LENGTH(FEET) =   316.00   MANNING'S N =  0.012
 DEPTH OF FLOW IN  24.0 INCH PIPE IS  18.0 INCHES
 PIPE-FLOW VELOCITY(FEET/SEC.) =   7.71
 ESTIMATED PIPE DIAMETER(INCH) =  24.00    NUMBER OF PIPES =   1
```

```
 PIPE-FLOW(CFS) =      19.44
 PIPE TRAVEL TIME(MIN.) =   0.68    Tc(MIN.) =    8.31
 LONGEST FLOWPATH FROM NODE    110.00 TO NODE    113.00 =     844.00 FEET.

****************************************************************************
 FLOW PROCESS FROM NODE    113.00 TO NODE    113.00 IS CODE =   1
----------------------------------------------------------------------------
 >>>>>DESIGNATE INDEPENDENT STREAM FOR CONFLUENCE<<<<<
 >>>>>AND COMPUTE VARIOUS CONFLUENCED STREAM VALUES<<<<<
============================================================================
 TOTAL NUMBER OF STREAMS =  2
 CONFLUENCE VALUES USED FOR INDEPENDENT STREAM  2 ARE:
 TIME OF CONCENTRATION(MIN.) =    8.31
 RAINFALL INTENSITY(INCH/HR) =   5.07
 AREA-AVERAGED Fm(INCH/HR) =  0.07
 AREA-AVERAGED Fp(INCH/HR) =  0.74
 AREA-AVERAGED Ap =  0.10
 EFFECTIVE STREAM AREA(ACRES) =       4.10
 TOTAL STREAM AREA(ACRES) =       4.10
 PEAK FLOW RATE(CFS) AT CONFLUENCE =      19.44

 ** CONFLUENCE DATA **
  STREAM       Q      Tc   Intensity   Fp(Fm)     Ap      Ae     HEADWATER
  NUMBER     (CFS)  (MIN.) (INCH/HR) (INCH/HR)          (ACRES)    NODE
     1       2S.38    7.69    S.316  0.74( 0.07) 0.10       5.2     100.00
     2       19.44    8.31    S.074  0.74( 0.07) 0.10       4.1     110.00

 RAINFALL INTENSITY AND TIME OF CONCENTRATION RATIO
 CONFLUENCE FORMULA USED FOR  2 STREAMS.

 ** PEAK FLOW RATE TABLE **
  STREAM       Q      Tc   Intensity   Fp(Fm)     Ap      Ae     HEADWATER
  NUMBER     (CFS)  (MIN.) (INCH/HR) (INCH/HR)          (ACRES)    NODE
     1       44.23    7.69    5.316  0.74( 0.07) 0.10       9.0     100.00
     2       43.64    8.31    5.074  0.74( 0.07) 0.10       9.4     110.00

 COMPUTED CONFLUENCE ESTIMATES ARE AS FOLLOWS:
 PEAK FLOW RATE(CFS) =      44.23    Tc(MIN.) =     7.69
 EFFECTIVE AREA(ACRES) =       9.04   AREA-AVERAGED Fm(INCH/HR) =  0.07
 AREA-AVERAGED Fp(INCH/HR) =  0.74  AREA-AVERAGED Ap =  0.10
 TOTAL AREA(ACRES) =        9.4
 LONGEST FLOWPATH FROM NODE    100.00 TO NODE    113.00 =    1034.00 FEET.

****************************************************************************
 FLOW PROCESS FROM NODE    113.00 TO NODE    114.00 IS CODE =  31
----------------------------------------------------------------------------
 >>>>>COMPUTE PIPE-FLOW TRAVEL TIME THRU SUBAREA<<<<<
 >>>>>USING COMPUTER-ESTIMATED PIPESIZE (NON-PRESSURE FLOW)<<<<<
============================================================================
 ELEVATION DATA: UPSTREAM(FEET) =  1361.S9  DOWNSTREAM(FEET) =  1360.34
 FLOW LENGTH(FEET) =   1S6.00   MANNING'S N =  0.012
 DEPTH OF FLOW IN  33.0 INCH PIPE IS  24.1 INCHES
 PIPE-FLOW VELOCITY(FEET/SEC.) =   9.51
 ESTIMATED PIPE DIAMETER(INCH) =  33.00    NUMBER OF PIPES =   1
 PIPE-FLOW(CFS) =      44.23
 PIPE TRAVEL TIME(MIN.) =   0.27    Tc(MIN.) =    7.97
 LONGEST FLOWPATH FROM NODE    100.00 TO NODE    114.00 =    1190.00 FEET.

****************************************************************************
 FLOW PROCESS FROM NODE    114.00 TO NODE    114.00 IS CODE =  81
----------------------------------------------------------------------------
 >>>>>ADDITION OF SUBAREA TO MAINLINE PEAK FLOW<<<<<
============================================================================
 MAINLINE Tc(MIN.) =    7.97
 * 100 YEAR RAINFALL INTENSITY(INCH/HR) =  5.20S
 SUBAREA LOSS RATE DATA(AMC III):
  DEVELOPMENT TYPE/      SCS SOIL   AREA      Fp         Ap      SCS
```

```
     LAND USE             GROUP   (ACRES)  (INCH/HR)  (DECIMAL)  CN
COMMERCIAL                  A        1.6S      0.74     0.100    S2
SUBAREA AVERAGE PERVIOUS LOSS RATE, Fp(INCH/HR) =  0.74
SUBAREA AVERAGE PERVIOUS AREA FRACTION, Ap =  0.100
SUBAREA AREA(ACRES) =    1.6S      SUBAREA RUNOFF(CFS) =    7.62
EFFECTIVE AREA(ACRES) =     10.69   AREA-AVERAGED Fm(INCH/HR) =  0.07
AREA-AVERAGED Fp(INCH/HR) =  0.74  AREA-AVERAGED Ap =  0.10
TOTAL AREA(ACRES) =       11.0       PEAK FLOW RATE(CFS) =      49.38

****************************************************************************
 FLOW PROCESS FROM NODE    114.00 TO NODE    11S.00 IS CODE =  31
----------------------------------------------------------------------------
 >>>>>COMPUTE PIPE-FLOW TRAVEL TIME THRU SUBAREA<<<<<
 >>>>>USING COMPUTER-ESTIMATED PIPESIZE (NON-PRESSURE FLOW)<<<<<
============================================================================
 ELEVATION DATA: UPSTREAM(FEET) =  1360.34  DOWNSTREAM(FEET) =  13S9.37
 FLOW LENGTH(FEET) =   324.00   MANNING'S N =  0.012
 DEPTH OF FLOW IN  42.0 INCH PIPE IS  29.7 INCHES
 PIPE-FLOW VELOCITY(FEET/SEC.) =   6.78
 ESTIMATED PIPE DIAMETER(INCH) =  42.00    NUMBER OF PIPES =   1
 PIPE-FLOW(CFS) =      49.38
 PIPE TRAVEL TIME(MIN.) =   0.80    Tc(MIN.) =    8.76
 LONGEST FLOWPATH FROM NODE    100.00 TO NODE    11S.00 =    1S14.00 FEET.

****************************************************************************
 FLOW PROCESS FROM NODE    11S.00 TO NODE    11S.00 IS CODE =  81
----------------------------------------------------------------------------
 >>>>>ADDITION OF SUBAREA TO MAINLINE PEAK FLOW<<<<<
============================================================================
 MAINLINE Tc(MIN.) =    8.76
 * 100 YEAR RAINFALL INTENSITY(INCH/HR) =  4.916
 SUBAREA LOSS RATE DATA(AMC III):
  DEVELOPMENT TYPE/      SCS SOIL   AREA      Fp         Ap      SCS
     LAND USE             GROUP   (ACRES)  (INCH/HR)  (DECIMAL)  CN
 COMMERCIAL                  A        0.3S      0.74     0.100    S2
 SUBAREA AVERAGE PERVIOUS LOSS RATE, Fp(INCH/HR) =  0.74
 SUBAREA AVERAGE PERVIOUS AREA FRACTION, Ap =  0.100
 SUBAREA AREA(ACRES) =    0.3S      SUBAREA RUNOFF(CFS) =    1.53
 EFFECTIVE AREA(ACRES) =     11.04   AREA-AVERAGED Fm(INCH/HR) =  0.07
 AREA-AVERAGED Fp(INCH/HR) =  0.74  AREA-AVERAGED Ap =  0.10
 TOTAL AREA(ACRES) =       11.4       PEAK FLOW RATE(CFS) =      49.38
 NOTE: PEAK FLOW RATE DEFAULTED TO UPSTREAM VALUE

****************************************************************************
 FLOW PROCESS FROM NODE    11S.00 TO NODE    122.00 IS CODE =  31
----------------------------------------------------------------------------
 >>>>>COMPUTE PIPE-FLOW TRAVEL TIME THRU SUBAREA<<<<<
 >>>>>USING COMPUTER-ESTIMATED PIPESIZE (NON-PRESSURE FLOW)<<<<<
============================================================================
 ELEVATION DATA: UPSTREAM(FEET) =  13S9.37  DOWNSTREAM(FEET) =  13S9.16
 FLOW LENGTH(FEET) =    68.00   MANNING'S N =  0.012
 DEPTH OF FLOW IN  42.0 INCH PIPE IS  29.4 INCHES
 PIPE-FLOW VELOCITY(FEET/SEC.) =   6.87
 ESTIMATED PIPE DIAMETER(INCH) =  42.00    NUMBER OF PIPES =   1
 PIPE-FLOW(CFS) =      49.38
 PIPE TRAVEL TIME(MIN.) =   0.16    Tc(MIN.) =    8.93
 LONGEST FLOWPATH FROM NODE    100.00 TO NODE    122.00 =    1S82.00 FEET.

****************************************************************************
 FLOW PROCESS FROM NODE    122.00 TO NODE    122.00 IS CODE =   1
----------------------------------------------------------------------------
 >>>>>DESIGNATE INDEPENDENT STREAM FOR CONFLUENCE<<<<<
============================================================================
 TOTAL NUMBER OF STREAMS =  2
 CONFLUENCE VALUES USED FOR INDEPENDENT STREAM  1 ARE:
 TIME OF CONCENTRATION(MIN.) =    8.93
 RAINFALL INTENSITY(INCH/HR) =   4.86
```

```
 AREA-AVERAGED Fm(INCH/HR) =  0.07
 AREA-AVERAGED Fp(INCH/HR) =  0.74
 AREA-AVERAGED Ap =  0.10
 EFFECTIVE STREAM AREA(ACRES) =      11.04
 TOTAL STREAM AREA(ACRES) =      11.3S
 PEAK FLOW RATE(CFS) AT CONFLUENCE =      49.38

****************************************************************************
 FLOW PROCESS FROM NODE    120.00 TO NODE    121.00 IS CODE =  21
----------------------------------------------------------------------------
 >>>>>RATIONAL METHOD INITIAL SUBAREA ANALYSIS<<<<<
 >>USE TIME-OF-CONCENTRATION NOMOGRAPH FOR INITIAL SUBAREA<<
============================================================================
 INITIAL SUBAREA FLOW-LENGTH(FEET) =   SS6.00
 ELEVATION DATA: UPSTREAM(FEET) =   1382.69  DOWNSTREAM(FEET) =   137S.18

 Tc = K*[(LENGTH** 3.00)/(ELEVATION CHANGE)]**0.20
 SUBAREA ANALYSIS USED MINIMUM Tc(MIN.) =    9.011
 * 100 YEAR RAINFALL INTENSITY(INCH/HR) =  4.834
 SUBAREA Tc AND LOSS RATE DATA(AMC III):
  DEVELOPMENT TYPE/      SCS SOIL   AREA      Fp          Ap      SCS   Tc
      LAND USE            GROUP   (ACRES)  (INCH/HR)  (DECIMAL)  CN  (MIN.)
 COMMERCIAL                 A        6.10      0.74      0.100    S2    9.01
 SUBAREA AVERAGE PERVIOUS LOSS RATE, Fp(INCH/HR) =  0.74
 SUBAREA AVERAGE PERVIOUS AREA FRACTION, Ap =  0.100
 SUBAREA RUNOFF(CFS) =     26.13
 TOTAL AREA(ACRES) =      6.10   PEAK FLOW RATE(CFS) =     26.13

****************************************************************************
 FLOW PROCESS FROM NODE    121.00 TO NODE    122.00 IS CODE =  31
----------------------------------------------------------------------------
 >>>>>COMPUTE PIPE-FLOW TRAVEL TIME THRU SUBAREA<<<<<
 >>>>>USING COMPUTER-ESTIMATED PIPESIZE (NON-PRESSURE FLOW)<<<<<
============================================================================
 ELEVATION DATA: UPSTREAM(FEET) =  1371.18  DOWNSTREAM(FEET) =  13S9.16
 FLOW LENGTH(FEET) =   117.00   MANNING'S N =  0.012
 DEPTH OF FLOW IN  18.0 INCH PIPE IS  11.S INCHES
 PIPE-FLOW VELOCITY(FEET/SEC.) =  22.00
 ESTIMATED PIPE DIAMETER(INCH) =  18.00    NUMBER OF PIPES =   1
 PIPE-FLOW(CFS) =      26.13
 PIPE TRAVEL TIME(MIN.) =   0.09    Tc(MIN.) =    9.10
 LONGEST FLOWPATH FROM NODE    120.00 TO NODE    122.00 =     673.00 FEET.

****************************************************************************
 FLOW PROCESS FROM NODE    122.00 TO NODE    122.00 IS CODE =   1
----------------------------------------------------------------------------
 >>>>>DESIGNATE INDEPENDENT STREAM FOR CONFLUENCE<<<<<
 >>>>>AND COMPUTE VARIOUS CONFLUENCED STREAM VALUES<<<<<
============================================================================
 TOTAL NUMBER OF STREAMS =  2
 CONFLUENCE VALUES USED FOR INDEPENDENT STREAM  2 ARE:
 TIME OF CONCENTRATION(MIN.) =    9.10
 RAINFALL INTENSITY(INCH/HR) =   4.81
 AREA-AVERAGED Fm(INCH/HR) =  0.07
 AREA-AVERAGED Fp(INCH/HR) =  0.74
 AREA-AVERAGED Ap =  0.10
 EFFECTIVE STREAM AREA(ACRES) =       6.10
 TOTAL STREAM AREA(ACRES) =       6.10
 PEAK FLOW RATE(CFS) AT CONFLUENCE =      26.13

 ** CONFLUENCE DATA **
  STREAM       Q      Tc   Intensity   Fp(Fm)      Ap      Ae     HEADWATER
  NUMBER     (CFS)  (MIN.) (INCH/HR) (INCH/HR)           (ACRES)    NODE
     1       49.38    8.93    4.862  0.74( 0.07) 0.10      11.0     100.00
     1       48.S3    9.SS    4.668  0.74( 0.07) 0.10      11.4     110.00
     2       26.13    9.10    4.806  0.74( 0.07) 0.10       6.1     120.00
```

RAINFALL INTENSITY AND TIME OF CONCENTRATION RATIO
CONFLUENCE FORMULA USED FOR 2 STREAMS.

** PEAK FLOW RATE TABLE **

STREAM NUMBER	Q (CFS)	Tc (MIN.)	Intensity (INCH/HR)	Fp(Fm) (INCH/HR)	Ap	Ae (ACRES)	HEADWATER NODE
1	7S.32	8.93	4.862	0.74(0.07)	0.10	17.0	100.00
2	7S.28	9.10	4.806	0.74(0.07)	0.10	17.2	120.00
3	73.90	9.SS	4.668	0.74(0.07)	0.10	17.S	110.00

COMPUTED CONFLUENCE ESTIMATES ARE AS FOLLOWS:
PEAK FLOW RATE(CFS) = 7S.32 Tc(MIN.) = 8.93
EFFECTIVE AREA(ACRES) = 17.03 AREA-AVERAGED Fm(INCH/HR) = 0.07
AREA-AVERAGED Fp(INCH/HR) = 0.74 AREA-AVERAGED Ap = 0.10
TOTAL AREA(ACRES) = 17.S
LONGEST FLOWPATH FROM NODE 100.00 TO NODE 122.00 = 1S82.00 FEET.

****
FLOW PROCESS FROM NODE 122.00 TO NODE 123.00 IS CODE = 31

>>>>>COMPUTE PIPE-FLOW TRAVEL TIME THRU SUBAREA<<<<<
>>>>>USING COMPUTER-ESTIMATED PIPESIZE (NON-PRESSURE FLOW)<<<<<
==========
ELEVATION DATA: UPSTREAM(FEET) = 13S9.16 DOWNSTREAM(FEET) = 13S8.01
FLOW LENGTH(FEET) = 4S4.00 MANNING'S N = 0.012
DEPTH OF FLOW IN 48.0 INCH PIPE IS 38.8 INCHES
PIPE-FLOW VELOCITY(FEET/SEC.) = 6.93
ESTIMATED PIPE DIAMETER(INCH) = 48.00 NUMBER OF PIPES = 1
PIPE-FLOW(CFS) = 7S.32
PIPE TRAVEL TIME(MIN.) = 1.09 Tc(MIN.) = 10.02
LONGEST FLOWPATH FROM NODE 100.00 TO NODE 123.00 = 2036.00 FEET.

****
FLOW PROCESS FROM NODE 123.00 TO NODE 123.00 IS CODE = 81

>>>>>ADDITION OF SUBAREA TO MAINLINE PEAK FLOW<<<<<
==========
MAINLINE Tc(MIN.) = 10.02
* 100 YEAR RAINFALL INTENSITY(INCH/HR) = 4.S36
SUBAREA LOSS RATE DATA(AMC III):

DEVELOPMENT TYPE/ LAND USE	SCS SOIL GROUP	AREA (ACRES)	Fp (INCH/HR)	Ap (DECIMAL)	SCS CN
COMMERCIAL	A	2.S0	0.74	0.100	S2

SUBAREA AVERAGE PERVIOUS LOSS RATE, Fp(INCH/HR) = 0.74
SUBAREA AVERAGE PERVIOUS AREA FRACTION, Ap = 0.100
SUBAREA AREA(ACRES) = 2.S0 SUBAREA RUNOFF(CFS) = 10.04
EFFECTIVE AREA(ACRES) = 19.S3 AREA-AVERAGED Fm(INCH/HR) = 0.07
AREA-AVERAGED Fp(INCH/HR) = 0.74 AREA-AVERAGED Ap = 0.10
TOTAL AREA(ACRES) = 20.0 PEAK FLOW RATE(CFS) = 78.43

****
FLOW PROCESS FROM NODE 123.00 TO NODE 303.00 IS CODE = 31

>>>>>COMPUTE PIPE-FLOW TRAVEL TIME THRU SUBAREA<<<<<
>>>>>USING COMPUTER-ESTIMATED PIPESIZE (NON-PRESSURE FLOW)<<<<<
==========
ELEVATION DATA: UPSTREAM(FEET) = 13S8.01 DOWNSTREAM(FEET) = 1343.S0
FLOW LENGTH(FEET) = S90.00 MANNING'S N = 0.012
DEPTH OF FLOW IN 33.0 INCH PIPE IS 24.4 INCHES
PIPE-FLOW VELOCITY(FEET/SEC.) = 16.68
ESTIMATED PIPE DIAMETER(INCH) = 33.00 NUMBER OF PIPES = 1
PIPE-FLOW(CFS) = 78.43
PIPE TRAVEL TIME(MIN.) = 0.S9 Tc(MIN.) = 10.61
LONGEST FLOWPATH FROM NODE 100.00 TO NODE 303.00 = 2626.00 FEET.

****
FLOW PROCESS FROM NODE 303.00 TO NODE 303.00 IS CODE = 10

```
----------------------------------------------------------------------------
 >>>>>MAIN-STREAM MEMORY COPIED ONTO MEMORY BANK # 1 <<<<<
============================================================================

****************************************************************************
 FLOW PROCESS FROM NODE    200.00 TO NODE    201.00 IS CODE =  21
----------------------------------------------------------------------------
 >>>>>RATIONAL METHOD INITIAL SUBAREA ANALYSIS<<<<<
 >>USE TIME-OF-CONCENTRATION NOMOGRAPH FOR INITIAL SUBAREA<<
============================================================================
 INITIAL SUBAREA FLOW-LENGTH(FEET) =   63S.00
 ELEVATION DATA: UPSTREAM(FEET) =   1390.64  DOWNSTREAM(FEET) =   1378.81

 Tc = K*[(LENGTH** 3.00)/(ELEVATION CHANGE)]**0.20
 SUBAREA ANALYSIS USED MINIMUM Tc(MIN.) =    8.911
 * 100 YEAR RAINFALL INTENSITY(INCH/HR) =  4.867
 SUBAREA Tc AND LOSS RATE DATA(AMC III):
  DEVELOPMENT TYPE/       SCS SOIL   AREA      Fp         Ap      SCS   Tc
      LAND USE             GROUP   (ACRES)  (INCH/HR)  (DECIMAL)  CN  (MIN.)
 COMMERCIAL                  A        7.30      0.74      0.100    S2    8.91
 SUBAREA AVERAGE PERVIOUS LOSS RATE, Fp(INCH/HR) =  0.74
 SUBAREA AVERAGE PERVIOUS AREA FRACTION, Ap =  0.100
 SUBAREA RUNOFF(CFS) =     31.49
 TOTAL AREA(ACRES) =      7.30   PEAK FLOW RATE(CFS) =     31.49

****************************************************************************
 FLOW PROCESS FROM NODE    201.00 TO NODE    202.00 IS CODE =  31
----------------------------------------------------------------------------
 >>>>>COMPUTE PIPE-FLOW TRAVEL TIME THRU SUBAREA<<<<<
 >>>>>USING COMPUTER-ESTIMATED PIPESIZE (NON-PRESSURE FLOW)<<<<<
============================================================================
 ELEVATION DATA: UPSTREAM(FEET) =  1374.81  DOWNSTREAM(FEET) =  1373.60
 FLOW LENGTH(FEET) =   242.00   MANNING'S N =  0.012
 DEPTH OF FLOW IN  33.0 INCH PIPE IS  22.3 INCHES
 PIPE-FLOW VELOCITY(FEET/SEC.) =   7.38
 ESTIMATED PIPE DIAMETER(INCH) =  33.00    NUMBER OF PIPES =   1
 PIPE-FLOW(CFS) =      31.49
 PIPE TRAVEL TIME(MIN.) =   0.SS    Tc(MIN.) =    9.46
 LONGEST FLOWPATH FROM NODE    200.00 TO NODE    202.00 =     877.00 FEET.

****************************************************************************
 FLOW PROCESS FROM NODE    202.00 TO NODE    202.00 IS CODE =  81
----------------------------------------------------------------------------
 >>>>>ADDITION OF SUBAREA TO MAINLINE PEAK FLOW<<<<<
============================================================================
 MAINLINE Tc(MIN.) =    9.46
 * 100 YEAR RAINFALL INTENSITY(INCH/HR) =  4.696
 SUBAREA LOSS RATE DATA(AMC III):
  DEVELOPMENT TYPE/       SCS SOIL   AREA      Fp         Ap      SCS
      LAND USE             GROUP   (ACRES)  (INCH/HR)  (DECIMAL)  CN
 COMMERCIAL                  A        2.8S      0.74      0.100    S2
 SUBAREA AVERAGE PERVIOUS LOSS RATE, Fp(INCH/HR) =  0.74
 SUBAREA AVERAGE PERVIOUS AREA FRACTION, Ap =  0.100
 SUBAREA AREA(ACRES) =    2.8S      SUBAREA RUNOFF(CFS) =   11.86
 EFFECTIVE AREA(ACRES) =     10.1S   AREA-AVERAGED Fm(INCH/HR) =  0.07
 AREA-AVERAGED Fp(INCH/HR) =  0.74  AREA-AVERAGED Ap =  0.10
 TOTAL AREA(ACRES) =       10.1       PEAK FLOW RATE(CFS) =      42.22

****************************************************************************
 FLOW PROCESS FROM NODE    202.00 TO NODE    203.00 IS CODE =  31
----------------------------------------------------------------------------
 >>>>>COMPUTE PIPE-FLOW TRAVEL TIME THRU SUBAREA<<<<<
 >>>>>USING COMPUTER-ESTIMATED PIPESIZE (NON-PRESSURE FLOW)<<<<<
============================================================================
 ELEVATION DATA: UPSTREAM(FEET) =  1373.60  DOWNSTREAM(FEET) =  1372.70
 FLOW LENGTH(FEET) =   180.00   MANNING'S N =  0.012
 DEPTH OF FLOW IN  36.0 INCH PIPE IS  2S.4 INCHES
```

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 PIPE-FLOW VELOCITY(FEET/SEC.) =   7.91
 ESTIMATED PIPE DIAMETER(INCH) =  36.00    NUMBER OF PIPES =   1
 PIPE-FLOW(CFS) =      42.22
 PIPE TRAVEL TIME(MIN.) =   0.38    Tc(MIN.) =    9.84
 LONGEST FLOWPATH FROM NODE    200.00 TO NODE    203.00 =    1057.00 FEET.

****************************************************************************
 FLOW PROCESS FROM NODE    203.00 TO NODE    203.00 IS CODE =  81
----------------------------------------------------------------------------
 >>>>>ADDITION OF SUBAREA TO MAINLINE PEAK FLOW<<<<<
============================================================================
 MAINLINE Tc(MIN.) =    9.84
 * 100 YEAR RAINFALL INTENSITY(INCH/HR) =  4.587
 SUBAREA LOSS RATE DATA(AMC III):
  DEVELOPMENT TYPE/      SCS SOIL   AREA      Fp         Ap     SCS
      LAND USE            GROUP   (ACRES)  (INCH/HR)  (DECIMAL)  CN
 COMMERCIAL                 A        1.60      0.74     0.100    S2
 SUBAREA AVERAGE PERVIOUS LOSS RATE, Fp(INCH/HR) =  0.74
 SUBAREA AVERAGE PERVIOUS AREA FRACTION, Ap =  0.100
 SUBAREA AREA(ACRES) =    1.60      SUBAREA RUNOFF(CFS) =    6.50
 EFFECTIVE AREA(ACRES) =     11.75   AREA-AVERAGED Fm(INCH/HR) =  0.07
 AREA-AVERAGED Fp(INCH/HR) =  0.74  AREA-AVERAGED Ap =  0.10
 TOTAL AREA(ACRES) =       11.8       PEAK FLOW RATE(CFS) =      47.72

****************************************************************************
 FLOW PROCESS FROM NODE    203.00 TO NODE    204.00 IS CODE =  31
----------------------------------------------------------------------------
 >>>>>COMPUTE PIPE-FLOW TRAVEL TIME THRU SUBAREA<<<<<
 >>>>>USING COMPUTER-ESTIMATED PIPESIZE (NON-PRESSURE FLOW)<<<<<
============================================================================
 ELEVATION DATA: UPSTREAM(FEET) =  1372.70  DOWNSTREAM(FEET) =  1370.73
 FLOW LENGTH(FEET) =   394.00   MANNING'S N =  0.012
 DEPTH OF FLOW IN  36.0 INCH PIPE IS  28.2 INCHES
 PIPE-FLOW VELOCITY(FEET/SEC.) =   8.03
 ESTIMATED PIPE DIAMETER(INCH) =  36.00    NUMBER OF PIPES =   1
 PIPE-FLOW(CFS) =      47.72
 PIPE TRAVEL TIME(MIN.) =   0.82    Tc(MIN.) =   10.66
 LONGEST FLOWPATH FROM NODE    200.00 TO NODE    204.00 =    1451.00 FEET.

****************************************************************************
 FLOW PROCESS FROM NODE    204.00 TO NODE    204.00 IS CODE =  81
----------------------------------------------------------------------------
 >>>>>ADDITION OF SUBAREA TO MAINLINE PEAK FLOW<<<<<
============================================================================
 MAINLINE Tc(MIN.) =   10.66
 * 100 YEAR RAINFALL INTENSITY(INCH/HR) =  4.372
 SUBAREA LOSS RATE DATA(AMC III):
  DEVELOPMENT TYPE/      SCS SOIL   AREA      Fp         Ap     SCS
      LAND USE            GROUP   (ACRES)  (INCH/HR)  (DECIMAL)  CN
 COMMERCIAL                 A        1.85      0.74     0.100    S2
 SUBAREA AVERAGE PERVIOUS LOSS RATE, Fp(INCH/HR) =  0.74
 SUBAREA AVERAGE PERVIOUS AREA FRACTION, Ap =  0.100
 SUBAREA AREA(ACRES) =    1.85      SUBAREA RUNOFF(CFS) =    7.16
 EFFECTIVE AREA(ACRES) =     13.60   AREA-AVERAGED Fm(INCH/HR) =  0.07
 AREA-AVERAGED Fp(INCH/HR) =  0.74  AREA-AVERAGED Ap =  0.10
 TOTAL AREA(ACRES) =       13.6       PEAK FLOW RATE(CFS) =      52.61

****************************************************************************
 FLOW PROCESS FROM NODE    204.00 TO NODE    302.00 IS CODE =   1
----------------------------------------------------------------------------
 >>>>>DESIGNATE INDEPENDENT STREAM FOR CONFLUENCE<<<<<
============================================================================
 TOTAL NUMBER OF STREAMS =  2
 CONFLUENCE VALUES USED FOR INDEPENDENT STREAM  1 ARE:
 TIME OF CONCENTRATION(MIN.) =   10.66
 RAINFALL INTENSITY(INCH/HR) =   4.37
 AREA-AVERAGED Fm(INCH/HR) =  0.07
```

```
 AREA-AVERAGED Fp(INCH/HR) =  0.74
 AREA-AVERAGED Ap =  0.10
 EFFECTIVE STREAM AREA(ACRES) =      13.60
 TOTAL STREAM AREA(ACRES) =      13.60
 PEAK FLOW RATE(CFS) AT CONFLUENCE =      S2.61

****************************************************************************
 FLOW PROCESS FROM NODE    300.00 TO NODE    301.00 IS CODE =  21
----------------------------------------------------------------------------
 >>>>>RATIONAL METHOD INITIAL SUBAREA ANALYSIS<<<<<
 >>USE TIME-OF-CONCENTRATION NOMOGRAPH FOR INITIAL SUBAREA<<
============================================================================
 INITIAL SUBAREA FLOW-LENGTH(FEET) =   908.00
 ELEVATION DATA: UPSTREAM(FEET) =   1368.06  DOWNSTREAM(FEET) =   1363.S2

 Tc = K*[(LENGTH** 3.00)/(ELEVATION CHANGE)]**0.20
 SUBAREA ANALYSIS USED MINIMUM Tc(MIN.) =   13.376
 * 100 YEAR RAINFALL INTENSITY(INCH/HR) =  3.814
 SUBAREA Tc AND LOSS RATE DATA(AMC III):
  DEVELOPMENT TYPE/       SCS SOIL   AREA      Fp         Ap      SCS   Tc
      LAND USE             GROUP   (ACRES)  (INCH/HR)  (DECIMAL)  CN  (MIN.)
 COMMERCIAL                  A        7.4S      0.74     0.100     S2   13.38
 SUBAREA AVERAGE PERVIOUS LOSS RATE, Fp(INCH/HR) =  0.74
 SUBAREA AVERAGE PERVIOUS AREA FRACTION, Ap =  0.100
 SUBAREA RUNOFF(CFS) =     2S.08
 TOTAL AREA(ACRES) =      7.4S   PEAK FLOW RATE(CFS) =     2S.08

****************************************************************************
 FLOW PROCESS FROM NODE    301.00 TO NODE    302.00 IS CODE =  31
----------------------------------------------------------------------------
 >>>>>COMPUTE PIPE-FLOW TRAVEL TIME THRU SUBAREA<<<<<
 >>>>>USING COMPUTER-ESTIMATED PIPESIZE (NON-PRESSURE FLOW)<<<<<
============================================================================
 ELEVATION DATA: UPSTREAM(FEET) =  13S9.S2  DOWNSTREAM(FEET) =  13S8.98
 FLOW LENGTH(FEET) =   107.00   MANNING'S N =  0.012
 DEPTH OF FLOW IN  30.0 INCH PIPE IS  20.6 INCHES
 PIPE-FLOW VELOCITY(FEET/SEC.) =   6.99
 ESTIMATED PIPE DIAMETER(INCH) =  30.00    NUMBER OF PIPES =   1
 PIPE-FLOW(CFS) =      2S.08
 PIPE TRAVEL TIME(MIN.) =   0.26    Tc(MIN.) =   13.63
 LONGEST FLOWPATH FROM NODE    300.00 TO NODE    302.00 =    101S.00 FEET.

****************************************************************************
 FLOW PROCESS FROM NODE    302.00 TO NODE    302.00 IS CODE =   1
----------------------------------------------------------------------------
 >>>>>DESIGNATE INDEPENDENT STREAM FOR CONFLUENCE<<<<<
 >>>>>AND COMPUTE VARIOUS CONFLUENCED STREAM VALUES<<<<<
============================================================================
 TOTAL NUMBER OF STREAMS =  2
 CONFLUENCE VALUES USED FOR INDEPENDENT STREAM  2 ARE:
 TIME OF CONCENTRATION(MIN.) =   13.63
 RAINFALL INTENSITY(INCH/HR) =   3.77
 AREA-AVERAGED Fm(INCH/HR) =  0.07
 AREA-AVERAGED Fp(INCH/HR) =  0.74
 AREA-AVERAGED Ap =  0.10
 EFFECTIVE STREAM AREA(ACRES) =       7.4S
 TOTAL STREAM AREA(ACRES) =       7.4S
 PEAK FLOW RATE(CFS) AT CONFLUENCE =      2S.08

 ** CONFLUENCE DATA **
  STREAM       Q      Tc   Intensity   Fp(Fm)     Ap      Ae     HEADWATER
  NUMBER     (CFS)  (MIN.) (INCH/HR) (INCH/HR)          (ACRES)    NODE
     1       S2.61   10.66    4.372  0.74( 0.07) 0.10      13.6     200.00
     2       2S.08   13.63    3.771  0.74( 0.07) 0.10       7.4     300.00

 RAINFALL INTENSITY AND TIME OF CONCENTRATION RATIO
 CONFLUENCE FORMULA USED FOR  2 STREAMS.
```

```
 ** PEAK FLOW RATE TABLE **
  STREAM       Q      Tc   Intensity   Fp(Fm)      Ap      Ae     HEADWATER
  NUMBER     (CFS)  (MIN.) (INCH/HR) (INCH/HR)          (ACRES)     NODE
     1       75.39   10.66    4.372  0.74( 0.07) 0.10      19.4     200.00
     2       70.33   13.63    3.771  0.74( 0.07) 0.10      21.0     300.00

 COMPUTED CONFLUENCE ESTIMATES ARE AS FOLLOWS:
 PEAK FLOW RATE(CFS) =      75.39    Tc(MIN.) =    10.66
 EFFECTIVE AREA(ACRES) =      19.42   AREA-AVERAGED Fm(INCH/HR) =  0.07
 AREA-AVERAGED Fp(INCH/HR) =  0.74  AREA-AVERAGED Ap =  0.10
 TOTAL AREA(ACRES) =       21.0
 LONGEST FLOWPATH FROM NODE    200.00 TO NODE    302.00 =    1451.00 FEET.

****************************************************************************
 FLOW PROCESS FROM NODE    302.00 TO NODE    303.00 IS CODE =  31
----------------------------------------------------------------------------
 >>>>>COMPUTE PIPE-FLOW TRAVEL TIME THRU SUBAREA<<<<<
 >>>>>USING COMPUTER-ESTIMATED PIPESIZE (NON-PRESSURE FLOW)<<<<<
============================================================================
 ELEVATION DATA: UPSTREAM(FEET) =  1358.98  DOWNSTREAM(FEET) =  1343.50
 FLOW LENGTH(FEET) =   247.00   MANNING'S N =  0.012
 DEPTH OF FLOW IN  27.0 INCH PIPE IS  20.4 INCHES
 PIPE-FLOW VELOCITY(FEET/SEC.) =  23.38
 ESTIMATED PIPE DIAMETER(INCH) =  27.00    NUMBER OF PIPES =   1
 PIPE-FLOW(CFS) =      75.39
 PIPE TRAVEL TIME(MIN.) =   0.18    Tc(MIN.) =   10.83
 LONGEST FLOWPATH FROM NODE    200.00 TO NODE    303.00 =    1698.00 FEET.

****************************************************************************
 FLOW PROCESS FROM NODE    303.00 TO NODE    303.00 IS CODE =  11
----------------------------------------------------------------------------
 >>>>>CONFLUENCE MEMORY BANK # 1 WITH THE MAIN-STREAM MEMORY<<<<<
============================================================================

 ** MAIN STREAM CONFLUENCE DATA **
  STREAM       Q      Tc   Intensity   Fp(Fm)      Ap      Ae     HEADWATER
  NUMBER     (CFS)  (MIN.) (INCH/HR) (INCH/HR)          (ACRES)     NODE
     1       75.39   10.83    4.329  0.74( 0.07) 0.10      19.4     200.00
     2       70.33   13.81    3.742  0.74( 0.07) 0.10      21.0     300.00
 LONGEST FLOWPATH FROM NODE    200.00 TO NODE    303.00 =    1698.00 FEET.

 ** MEMORY BANK #  1 CONFLUENCE DATA **
  STREAM       Q      Tc   Intensity   Fp(Fm)      Ap      Ae     HEADWATER
  NUMBER     (CFS)  (MIN.) (INCH/HR) (INCH/HR)          (ACRES)     NODE
     1       78.43   10.61    4.383  0.74( 0.07) 0.10      19.5     100.00
     2       78.41   10.78    4.341  0.74( 0.07) 0.10      19.7     120.00
     3       77.22   11.24    4.235  0.74( 0.07) 0.10      20.0     110.00
 LONGEST FLOWPATH FROM NODE    100.00 TO NODE    303.00 =    2626.00 FEET.

 ** PEAK FLOW RATE TABLE **
  STREAM       Q      Tc   Intensity   Fp(Fm)      Ap      Ae     HEADWATER
  NUMBER     (CFS)  (MIN.) (INCH/HR) (INCH/HR)          (ACRES)     NODE
     1      153.21   10.61    4.383  0.74( 0.07) 0.10      38.6     100.00
     2      153.67   10.78    4.341  0.74( 0.07) 0.10      39.1     120.00
     3      153.67   10.83    4.329  0.74( 0.07) 0.10      39.2     200.00
     4      151.92   11.24    4.235  0.74( 0.07) 0.10      39.6     110.00
     5      138.40   13.81    3.742  0.74( 0.07) 0.10      41.0     300.00
   TOTAL AREA(ACRES) =        41.0

 COMPUTED CONFLUENCE ESTIMATES ARE AS FOLLOWS:
 PEAK FLOW RATE(CFS) =      153.67  Tc(MIN.) =   10.831
 EFFECTIVE AREA(ACRES) =     39.18  AREA-AVERAGED Fm(INCH/HR) =  0.07
 AREA-AVERAGED Fp(INCH/HR) =  0.74  AREA-AVERAGED Ap =  0.10
 TOTAL AREA(ACRES) =       41.0
 LONGEST FLOWPATH FROM NODE    100.00 TO NODE    303.00 =    2626.00 FEET.
```

```
**************************************************************************
 FLOW PROCESS FROM NODE    303.00 TO NODE    303.00 IS CODE =  12
--------------------------------------------------------------------------
 >>>>>CLEAR MEMORY BANK # 1 <<<<<
==========================================================================

**************************************************************************
 FLOW PROCESS FROM NODE    303.00 TO NODE    304.00 IS CODE =  31
--------------------------------------------------------------------------
 >>>>>COMPUTE PIPE-FLOW TRAVEL TIME THRU SUBAREA<<<<<
 >>>>>USING COMPUTER-ESTIMATED PIPESIZE (NON-PRESSURE FLOW)<<<<<
==========================================================================
 ELEVATION DATA: UPSTREAM(FEET) =  1343.S0  DOWNSTREAM(FEET) =  1342.2S
 FLOW LENGTH(FEET) =    98.00   MANNING'S N =  0.012
 DEPTH OF FLOW IN  48.0 INCH PIPE IS  3S.S INCHES
 PIPE-FLOW VELOCITY(FEET/SEC.) =  1S.43
 ESTIMATED PIPE DIAMETER(INCH) =  48.00    NUMBER OF PIPES =   1
 PIPE-FLOW(CFS) =     1S3.67
 PIPE TRAVEL TIME(MIN.) =   0.11    Tc(MIN.) =   10.94
 LONGEST FLOWPATH FROM NODE    100.00 TO NODE    304.00 =    2724.00 FEET.

**************************************************************************
 FLOW PROCESS FROM NODE    304.00 TO NODE    304.00 IS CODE =  81
--------------------------------------------------------------------------
 >>>>>ADDITION OF SUBAREA TO MAINLINE PEAK FLOW<<<<<
==========================================================================
 MAINLINE Tc(MIN.) =   10.94
 * 100 YEAR RAINFALL INTENSITY(INCH/HR) =  4.304
 SUBAREA LOSS RATE DATA(AMC III):
  DEVELOPMENT TYPE/       SCS SOIL   AREA      Fp         Ap      SCS
      LAND USE             GROUP   (ACRES)  (INCH/HR)  (DECIMAL)  CN
 COMMERCIAL                  A        1.00      0.74     0.100    S2
 SUBAREA AVERAGE PERVIOUS LOSS RATE, Fp(INCH/HR) =  0.74
 SUBAREA AVERAGE PERVIOUS AREA FRACTION, Ap =  0.100
 SUBAREA AREA(ACRES) =    1.00      SUBAREA RUNOFF(CFS) =    3.81
 EFFECTIVE AREA(ACRES) =     40.18   AREA-AVERAGED Fm(INCH/HR) =  0.07
 AREA-AVERAGED Fp(INCH/HR) =  0.74  AREA-AVERAGED Ap =  0.10
 TOTAL AREA(ACRES) =       42.0       PEAK FLOW RATE(CFS) =     1S3.67
 NOTE: PEAK FLOW RATE DEFAULTED TO UPSTREAM VALUE

**************************************************************************
 FLOW PROCESS FROM NODE    304.00 TO NODE    30S.00 IS CODE =  31
--------------------------------------------------------------------------
 >>>>>COMPUTE PIPE-FLOW TRAVEL TIME THRU SUBAREA<<<<<
 >>>>>USING COMPUTER-ESTIMATED PIPESIZE (NON-PRESSURE FLOW)<<<<<
==========================================================================
 ELEVATION DATA: UPSTREAM(FEET) =  1342.2S  DOWNSTREAM(FEET) =  1341.84
 FLOW LENGTH(FEET) =    22.00   MANNING'S N =  0.012
 DEPTH OF FLOW IN  4S.0 INCH PIPE IS  32.8 INCHES
 PIPE-FLOW VELOCITY(FEET/SEC.) =  17.82
 ESTIMATED PIPE DIAMETER(INCH) =  4S.00    NUMBER OF PIPES =   1
 PIPE-FLOW(CFS) =     1S3.67
 PIPE TRAVEL TIME(MIN.) =   0.02    Tc(MIN.) =   10.96
 LONGEST FLOWPATH FROM NODE    100.00 TO NODE    30S.00 =    2746.00 FEET.

**************************************************************************
 FLOW PROCESS FROM NODE    30S.00 TO NODE    30S.00 IS CODE =  81
--------------------------------------------------------------------------
 >>>>>ADDITION OF SUBAREA TO MAINLINE PEAK FLOW<<<<<
==========================================================================
 MAINLINE Tc(MIN.) =   10.96
 * 100 YEAR RAINFALL INTENSITY(INCH/HR) =  4.299
 SUBAREA LOSS RATE DATA(AMC III):
  DEVELOPMENT TYPE/       SCS SOIL   AREA      Fp         Ap      SCS
      LAND USE             GROUP   (ACRES)  (INCH/HR)  (DECIMAL)  CN
 COMMERCIAL                  A        S.00      0.74     0.100    S2
 NATURAL FAIR COVER
```

```
"OPEN BRUSH"              A        0.SS      0.SS     1.000    66
SUBAREA AVERAGE PERVIOUS LOSS RATE, Fp(INCH/HR) =  0.64
SUBAREA AVERAGE PERVIOUS AREA FRACTION, Ap =  0.189
SUBAREA AREA(ACRES) =    S.SS      SUBAREA RUNOFF(CFS) =   20.87
EFFECTIVE AREA(ACRES) =     4S.73   AREA-AVERAGED Fm(INCH/HR) =  0.08
AREA-AVERAGED Fp(INCH/HR) =  0.72  AREA-AVERAGED Ap =  0.11
TOTAL AREA(ACRES) =       47.S       PEAK FLOW RATE(CFS) =     173.64

** PEAK FLOW RATE TABLE **
 STREAM       Q      Tc   Intensity   Fp(Fm)     Ap     Ae     HEADWATER
 NUMBER     (CFS)  (MIN.) (INCH/HR) (INCH/HR)          (ACRES)    NODE
    1      173.43   10.74    4.3S2  0.72( 0.08) 0.11      4S.1     100.00
    2      173.69   10.91    4.311  0.72( 0.08) 0.11      4S.6     120.00
    3      173.64   10.96    4.299  0.72( 0.08) 0.11      4S.7     200.00
    4      171.39   11.36    4.207  0.72( 0.08) 0.11      46.1     110.00
    S      1SS.84   13.94    3.721  0.72( 0.08) 0.11      47.S     300.00
NEW PEAK FLOW DATA ARE:
PEAK FLOW RATE(CFS) =     173.69  Tc(MIN.) =   10.91
AREA-AVERAGED Fm(INCH/HR) =  0.08  AREA-AVERAGED Fp(INCH/HR) =  0.72
AREA-AVERAGED Ap =  0.11  EFFECTIVE AREA(ACRES) =      4S.61
================================================================================
END OF STUDY SUMMARY:
TOTAL AREA(ACRES)      =       47.S  TC(MIN.) =     10.91
EFFECTIVE AREA(ACRES) =     4S.61  AREA-AVERAGED Fm(INCH/HR)=  0.08
AREA-AVERAGED Fp(INCH/HR) =  0.72  AREA-AVERAGED Ap = 0.111
PEAK FLOW RATE(CFS)   =     173.69

** PEAK FLOW RATE TABLE **
 STREAM       Q      Tc   Intensity   Fp(Fm)     Ap     Ae     HEADWATER
 NUMBER     (CFS)  (MIN.) (INCH/HR) (INCH/HR)          (ACRES)    NODE
    1      173.43   10.74    4.3S2  0.72( 0.08) 0.11      4S.1     100.00
    2      173.69   10.91    4.311  0.72( 0.08) 0.11      4S.6     120.00
    3      173.64   10.96    4.299  0.72( 0.08) 0.11      4S.7     200.00
    4      171.39   11.36    4.207  0.72( 0.08) 0.11      46.1     110.00
    S      1SS.84   13.94    3.721  0.72( 0.08) 0.11      47.S     300.00
================================================================================
================================================================================
END OF RATIONAL METHOD ANALYSIS
```

```
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                          Analysis prepared by:

                        THIENES ENGINEERING, INC.
                           14349 FIRESTONE BLVD
                           LA MIRADA, CA 90638
                               714-521-4811

 ************************* DESCRIPTION OF STUDY *************************
* TEI JOB NO 36S1                                                       *
* 100-YEAR PROPOSED EVENT                                               *
* PROPOSED CONDITION (NODES 400-401)                                    *
 ************************************************************************

  FILE NAME: W:\36S1\PRELIM\400P.DAT
  TIME/DATE OF STUDY: 08:04 01/14/2020
==========================================================================
  USER SPECIFIED HYDROLOGY AND HYDRAULIC MODEL INFORMATION:
==========================================================================
                    --*TIME-OF-CONCENTRATION MODEL*--

  USER SPECIFIED STORM EVENT(YEAR) =  100.00
  SPECIFIED MINIMUM PIPE SIZE(INCH) =  12.00
  SPECIFIED PERCENT OF GRADIENTS(DECIMAL) TO USE FOR FRICTION SLOPE = 0.95
  *USER-DEFINED LOGARITHMIC INTERPOLATION USED FOR RAINFALL*

  SLOPE OF INTENSITY DURATION CURVE(LOG(I;IN/HR) vs. LOG(Tc;MIN)) = 0.6000
  USER SPECIFIED 1-HOUR INTENSITY(INCH/HOUR) = 1.5500

  *ANTECEDENT MOISTURE CONDITION (AMC) III ASSUMED FOR RATIONAL METHOD*

  *USER-DEFINED STREET-SECTIONS FOR COUPLED PIPEFLOW AND STREETFLOW MODEL*
     HALF-  CROWN TO   STREET-CROSSFALL:   CURB  GUTTER-GEOMETRIES:  MANNING
     WIDTH  CROSSFALL  IN-  / OUT-/PARK-  HEIGHT  WIDTH  LIP   HIKE  FACTOR
NO.   (FT)     (FT)    SIDE / SIDE/ WAY    (FT)    (FT)  (FT)  (FT)    (n)
===  =====  =========  =================  ======  ===== ====== ===== =======
  1   30.0     20.0    0.018/0.018/0.020   0.67    2.00 0.0312 0.167 0.0150

  GLOBAL STREET FLOW-DEPTH CONSTRAINTS:
    1. Relative Flow-Depth =  0.00 FEET
       as (Maximum Allowable Street Flow Depth) - (Top-of-Curb)
    2. (Depth)*(Velocity) Constraint =  6.0 (FT*FT/S)
  *USER-SPECIFIED MINIMUM TOPOGRAPHIC SLOPE ADJUSTMENT NOT SELECTED

**************************************************************************
  FLOW PROCESS FROM NODE    400.00 TO NODE    401.00 IS CODE =  21
--------------------------------------------------------------------------
  >>>>>RATIONAL METHOD INITIAL SUBAREA ANALYSIS<<<<<
  >>USE TIME-OF-CONCENTRATION NOMOGRAPH FOR INITIAL SUBAREA<<
==========================================================================
  INITIAL SUBAREA FLOW-LENGTH(FEET) =   169.00
  ELEVATION DATA: UPSTREAM(FEET) =   1372.14  DOWNSTREAM(FEET) =   1351.71

  Tc = K*[(LENGTH** 3.00)/(ELEVATION CHANGE)]**0.20
  SUBAREA ANALYSIS USED MINIMUM Tc(MIN.) =    5.000
  * 100 YEAR RAINFALL INTENSITY(INCH/HR) =  6.884
  SUBAREA Tc AND LOSS RATE DATA(AMC III):
   DEVELOPMENT TYPE/      SCS SOIL   AREA      Fp         Ap      SCS   Tc
       LAND USE            GROUP   (ACRES)  (INCH/HR)  (DECIMAL)  CN  (MIN.)
  COMMERCIAL                 A        0.25      0.74      0.100    52    5.00
  SUBAREA AVERAGE PERVIOUS LOSS RATE, Fp(INCH/HR) =  0.74
```

```
  SUBAREA AVERAGE PERVIOUS AREA FRACTION, Ap =  0.100
  SUBAREA RUNOFF(CFS) =      1.53
  TOTAL AREA(ACRES) =      0.25   PEAK FLOW RATE(CFS) =      1.53
================================================================================
  END OF STUDY SUMMARY:
  TOTAL AREA(ACRES)      =        0.2  TC(MIN.) =      5.00
  EFFECTIVE AREA(ACRES) =      0.25  AREA-AVERAGED Fm(INCH/HR)=  0.07
  AREA-AVERAGED Fp(INCH/HR) =  0.74  AREA-AVERAGED Ap = 0.100
  PEAK FLOW RATE(CFS)    =       1.53
================================================================================
================================================================================
  END OF RATIONAL METHOD ANALYSIS
```

```
**************************************************************************
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                          Analysis prepared by:

                        THIENES ENGINEERING, INC.
                           14349 FIRESTONE BLVD
                           LA MIRADA, CA 9063B
                               714-S21-4811

 ************************* DESCRIPTION OF STUDY *************************
* TEI JOB NO 36S1                                                       *
* 100-YEAR STORM EVENT                                                  *
* PROPOSED CONDITION (NODES S00-S01)                                    *
 ************************************************************************

  FILE NAME: W:\36S1\PRELIM\S00P.DAT
  TIME/DATE OF STUDY: 0B:09 01/14/2020
==========================================================================
  USER SPECIFIED HYDROLOGY AND HYDRAULIC MODEL INFORMATION:
==========================================================================
                    --*TIME-OF-CONCENTRATION MODEL*--

  USER SPECIFIED STORM EVENT(YEAR) =  100.00
  SPECIFIED MINIMUM PIPE SIZE(INCH) =  12.00
  SPECIFIED PERCENT OF GRADIENTS(DECIMAL) TO USE FOR FRICTION SLOPE = 0.9S
  *USER-DEFINED LOGARITHMIC INTERPOLATION USED FOR RAINFALL*

  SLOPE OF INTENSITY DURATION CURVE(LOG(I;IN/HR) vs. LOG(Tc;MIN)) = 0.6000
  USER SPECIFIED 1-HOUR INTENSITY(INCH/HOUR) = 1.SS00

  *ANTECEDENT MOISTURE CONDITION (AMC) III ASSUMED FOR RATIONAL METHOD*

  *USER-DEFINED STREET-SECTIONS FOR COUPLED PIPEFLOW AND STREETFLOW MODEL*
     HALF-  CROWN TO   STREET-CROSSFALL:   CURB  GUTTER-GEOMETRIES:  MANNING
     WIDTH  CROSSFALL  IN-  / OUT-/PARK-  HEIGHT  WIDTH  LIP   HIKE  FACTOR
NO.   (FT)     (FT)    SIDE / SIDE/ WAY    (FT)    (FT)  (FT)  (FT)    (n)
===  =====  =========  =================  ======  ===== ====== ===== =======
  1   30.0     20.0    0.018/0.018/0.020   0.67    2.00 0.0312 0.167 0.01S0

  GLOBAL STREET FLOW-DEPTH CONSTRAINTS:
    1. Relative Flow-Depth =  0.00 FEET
       as (Maximum Allowable Street Flow Depth) - (Top-of-Curb)
    2. (Depth)*(Velocity) Constraint =  6.0 (FT*FT/S)
  *USER-SPECIFIED MINIMUM TOPOGRAPHIC SLOPE ADJUSTMENT NOT SELECTED

**************************************************************************
  FLOW PROCESS FROM NODE    S00.00 TO NODE    S01.00 IS CODE =  21
--------------------------------------------------------------------------
  >>>>>RATIONAL METHOD INITIAL SUBAREA ANALYSIS<<<<<
  >>USE TIME-OF-CONCENTRATION NOMOGRAPH FOR INITIAL SUBAREA<<
==========================================================================
  INITIAL SUBAREA FLOW-LENGTH(FEET) =   269.00
  ELEVATION DATA: UPSTREAM(FEET) =   136S.27  DOWNSTREAM(FEET) =   13S2.3B

  Tc = K*[(LENGTH** 3.00)/(ELEVATION CHANGE)]**0.20
  SUBAREA ANALYSIS USED MINIMUM Tc(MIN.) =    S.232
  * 100 YEAR RAINFALL INTENSITY(INCH/HR) =  6.699
  SUBAREA Tc AND LOSS RATE DATA(AMC III):
   DEVELOPMENT TYPE/      SCS SOIL   AREA      Fp         Ap      SCS   Tc
       LAND USE            GROUP   (ACRES)  (INCH/HR)  (DECIMAL)  CN  (MIN.)
  COMMERCIAL                 A        0.70      0.74     0.100     S2    S.23
  SUBAREA AVERAGE PERVIOUS LOSS RATE, Fp(INCH/HR) =  0.74
```

```
 SUBAREA AVERAGE PERVIOUS AREA FRACTION, Ap =  0.100
 SUBAREA RUNOFF(CFS) =      4.17
 TOTAL AREA(ACRES) =      0.70   PEAK FLOW RATE(CFS) =      4.17
================================================================================
 END OF STUDY SUMMARY:
 TOTAL AREA(ACRES)      =        0.7  TC(MIN.) =      5.23
 EFFECTIVE AREA(ACRES) =      0.70  AREA-AVERAGED Fm(INCH/HR)=  0.07
 AREA-AVERAGED Fp(INCH/HR) =  0.74  AREA-AVERAGED Ap = 0.100
 PEAK FLOW RATE(CFS)   =       4.17
================================================================================
================================================================================
 END OF RATIONAL METHOD ANALYSIS
```

```
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                          Analysis prepared by:

                        THIENES ENGINEERING, INC.
                           14349 FIRESTONE BLVD
                           LA MIRADA, CA 90638
                               714-521-4811

 ************************* DESCRIPTION OF STUDY *************************
* TEI JOB NO 36S1                                                       *
* 100 YEAR STORM EVENT                                                  *
* PROPOSED CONDITION SOUTHERN LANDSCAPE BUFFER                          *
 ************************************************************************

  FILE NAME: W:\36S1\PRELIM\600P.DAT
  TIME/DATE OF STUDY: 13:35 01/21/2020
==========================================================================
  USER SPECIFIED HYDROLOGY AND HYDRAULIC MODEL INFORMATION:
==========================================================================
                    --*TIME-OF-CONCENTRATION MODEL*--

  USER SPECIFIED STORM EVENT(YEAR) =  100.00
  SPECIFIED MINIMUM PIPE SIZE(INCH) =  12.00
  SPECIFIED PERCENT OF GRADIENTS(DECIMAL) TO USE FOR FRICTION SLOPE = 0.95
  *USER-DEFINED LOGARITHMIC INTERPOLATION USED FOR RAINFALL*

  SLOPE OF INTENSITY DURATION CURVE(LOG(I;IN/HR) vs. LOG(Tc;MIN)) = 0.6000
  USER SPECIFIED 1-HOUR INTENSITY(INCH/HOUR) = 1.5S00

  *ANTECEDENT MOISTURE CONDITION (AMC) III ASSUMED FOR RATIONAL METHOD*

  *USER-DEFINED STREET-SECTIONS FOR COUPLED PIPEFLOW AND STREETFLOW MODEL*
     HALF-  CROWN TO   STREET-CROSSFALL:   CURB  GUTTER-GEOMETRIES:  MANNING
     WIDTH  CROSSFALL  IN-  / OUT-/PARK-  HEIGHT  WIDTH  LIP   HIKE  FACTOR
NO.   (FT)     (FT)    SIDE / SIDE/ WAY    (FT)    (FT)  (FT)  (FT)    (n)
===  =====  =========  =================  ======  ===== ====== ===== =======
  1   30.0     20.0    0.018/0.018/0.020   0.67    2.00 0.0312 0.167 0.01S0

  GLOBAL STREET FLOW-DEPTH CONSTRAINTS:
    1. Relative Flow-Depth =  0.00 FEET
       as (Maximum Allowable Street Flow Depth) - (Top-of-Curb)
    2. (Depth)*(Velocity) Constraint =  6.0 (FT*FT/S)
  *SIZE PIPE WITH A FLOW CAPACITY GREATER THAN
   OR EQUAL TO THE UPSTREAM TRIBUTARY PIPE.*
  *USER-SPECIFIED MINIMUM TOPOGRAPHIC SLOPE ADJUSTMENT NOT SELECTED

**************************************************************************
  FLOW PROCESS FROM NODE    600.00 TO NODE    601.00 IS CODE =  22
--------------------------------------------------------------------------
  >>>>>RATIONAL METHOD INITIAL SUBAREA ANALYSIS<<<<<
  >>>>>USE SPECIFIED Tc VALUE FOR INITIAL SUBAREA<<<
==========================================================================
  USER SPECIFIED Tc(MIN.) =    5.000
  * 100 YEAR RAINFALL INTENSITY(INCH/HR) =  6.884
  SUBAREA LOSS RATE DATA(AMC III):
   DEVELOPMENT TYPE/      SCS SOIL   AREA      Fp         Ap      SCS
       LAND USE            GROUP   (ACRES)  (INCH/HR)  (DECIMAL)  CN
  PUBLIC PARK               A        1.35      0.74     0.8S0    52
  SUBAREA AVERAGE PERVIOUS LOSS RATE, Fp(INCH/HR) =  0.74
  SUBAREA AVERAGE PERVIOUS AREA FRACTION, Ap =  0.850
  SUBAREA RUNOFF(CFS) =      7.60
```

```
 TOTAL AREA(ACRES) =      1.35   PEAK FLOW RATE(CFS) =      7.60
================================================================================
 END OF STUDY SUMMARY:
 TOTAL AREA(ACRES)     =        1.4  TC(MIN.) =      5.00
 EFFECTIVE AREA(ACRES) =       1.35  AREA-AVERAGED Fm(INCH/HR)=  0.63
 AREA-AVERAGED Fp(INCH/HR) =  0.74  AREA-AVERAGED Ap = 0.850
 PEAK FLOW RATE(CFS)   =       7.60
================================================================================
================================================================================
 END OF RATIONAL METHOD ANALYSIS
```

```
**************************************************************************
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                          Analysis prepared by:

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                           14349 FIRESTONE BLVD
                           LA MIRADA, CA 90638
                               714-521-4811

 ************************* DESCRIPTION OF STUDY *************************
* TEI JOB NO 3651                                                       *
* 100 YEAR STORM EVENT                                                  *
* PROPOSED CONDITION EASTERN LANDSCAPE BUFFER                           *
 ************************************************************************

  FILE NAME: W:\3651\PRELIM\700P.DAT
  TIME/DATE OF STUDY: 13:37 01/21/2020
========================================================================
  USER SPECIFIED HYDROLOGY AND HYDRAULIC MODEL INFORMATION:
========================================================================
                    --*TIME-OF-CONCENTRATION MODEL*--

  USER SPECIFIED STORM EVENT(YEAR) =  100.00
  SPECIFIED MINIMUM PIPE SIZE(INCH) =  12.00
  SPECIFIED PERCENT OF GRADIENTS(DECIMAL) TO USE FOR FRICTION SLOPE = 0.95
  *USER-DEFINED LOGARITHMIC INTERPOLATION USED FOR RAINFALL*

  SLOPE OF INTENSITY DURATION CURVE(LOG(I;IN/HR) vs. LOG(Tc;MIN)) = 0.6000
  USER SPECIFIED 1-HOUR INTENSITY(INCH/HOUR) = 1.5500

  *ANTECEDENT MOISTURE CONDITION (AMC) III ASSUMED FOR RATIONAL METHOD*

  *USER-DEFINED STREET-SECTIONS FOR COUPLED PIPEFLOW AND STREETFLOW MODEL*
     HALF-  CROWN TO   STREET-CROSSFALL:   CURB  GUTTER-GEOMETRIES:  MANNING
     WIDTH  CROSSFALL  IN-  / OUT-/PARK-  HEIGHT  WIDTH  LIP   HIKE  FACTOR
NO.   (FT)     (FT)    SIDE / SIDE/ WAY    (FT)    (FT)  (FT)  (FT)    (n)
===  =====  =========  =================  ======  ===== ====== ===== =======
  1   30.0     20.0    0.018/0.018/0.020   0.67    2.00 0.0312 0.167 0.0150

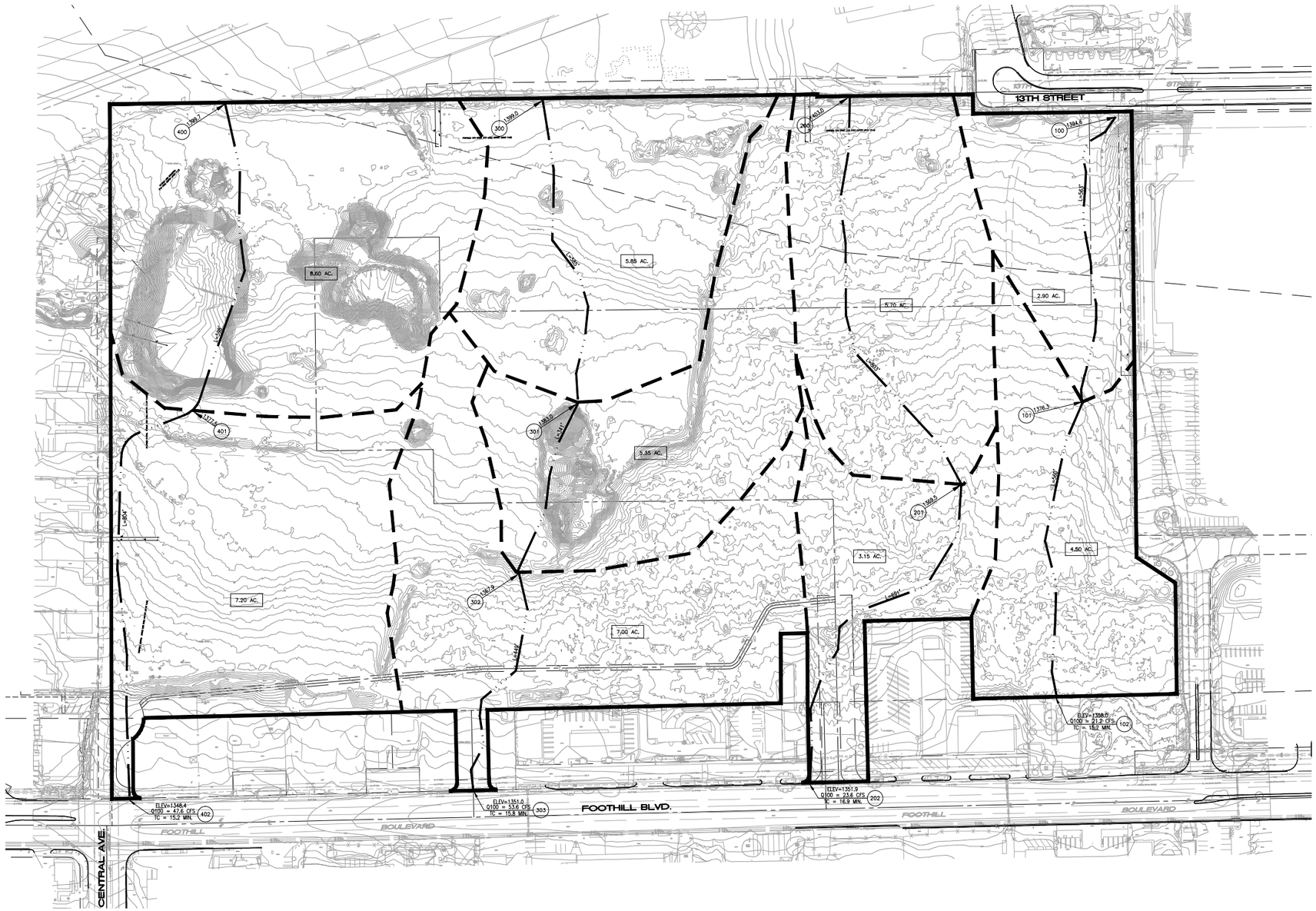
  GLOBAL STREET FLOW-DEPTH CONSTRAINTS:
    1. Relative Flow-Depth =  0.00 FEET
       as (Maximum Allowable Street Flow Depth) - (Top-of-Curb)
    2. (Depth)*(Velocity) Constraint =  6.0 (FT*FT/S)
  *SIZE PIPE WITH A FLOW CAPACITY GREATER THAN
   OR EQUAL TO THE UPSTREAM TRIBUTARY PIPE.*
  *USER-SPECIFIED MINIMUM TOPOGRAPHIC SLOPE ADJUSTMENT NOT SELECTED

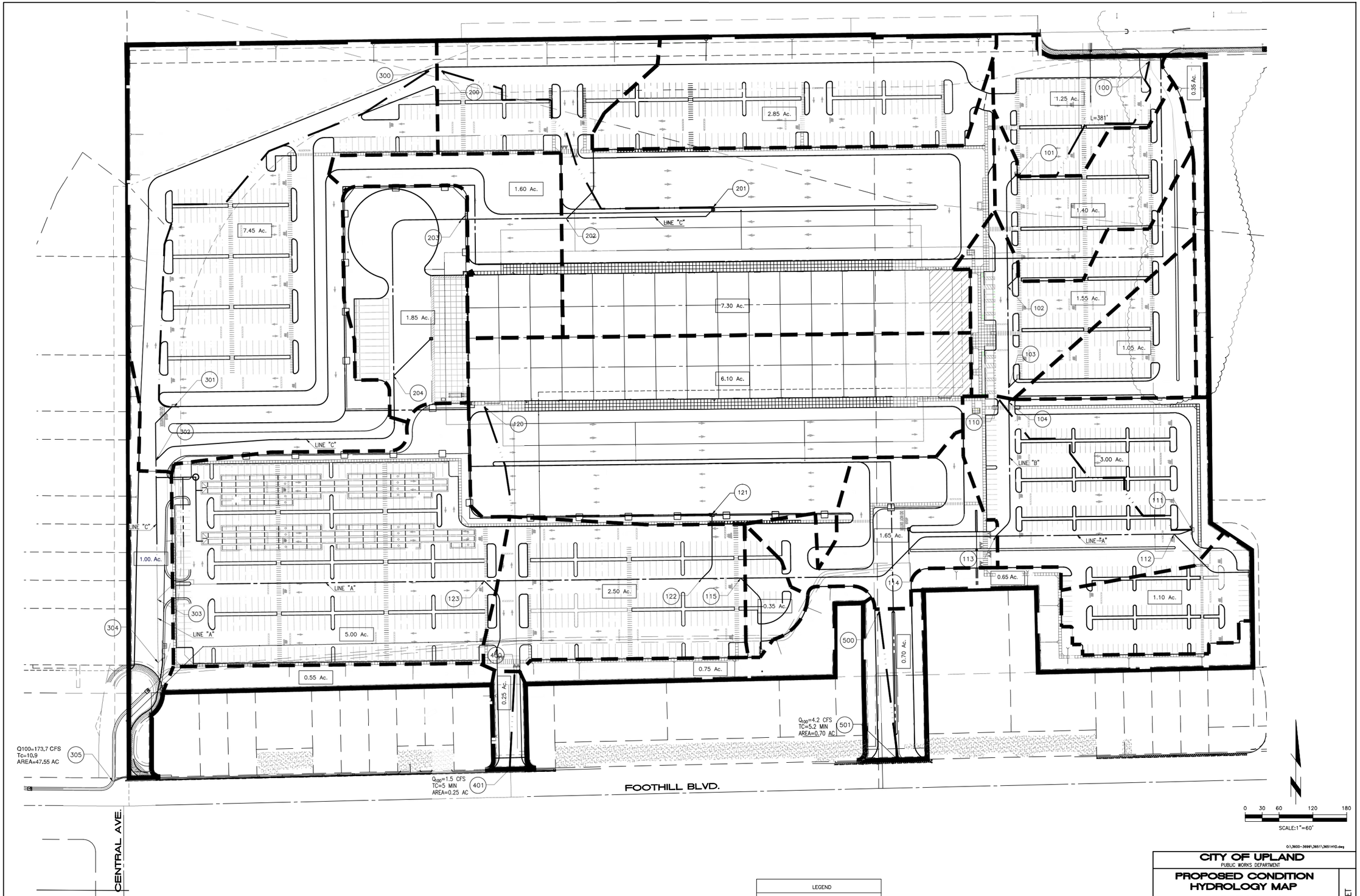
**************************************************************************
  FLOW PROCESS FROM NODE    700.00 TO NODE    701.00 IS CODE =  22
--------------------------------------------------------------------------
  >>>>>RATIONAL METHOD INITIAL SUBAREA ANALYSIS<<<<<
  >>>>>USE SPECIFIED Tc VALUE FOR INITIAL SUBAREA<<<
==========================================================================
  USER SPECIFIED Tc(MIN.) =    5.000
  * 100 YEAR RAINFALL INTENSITY(INCH/HR) =  6.884
  SUBAREA LOSS RATE DATA(AMC III):
   DEVELOPMENT TYPE/       SCS SOIL   AREA      Fp         Ap      SCS
       LAND USE             GROUP   (ACRES)  (INCH/HR)  (DECIMAL)  CN
  PUBLIC PARK                 A        0.35      0.74      0.850    52
  SUBAREA AVERAGE PERVIOUS LOSS RATE, Fp(INCH/HR) =  0.74
  SUBAREA AVERAGE PERVIOUS AREA FRACTION, Ap =  0.850
  SUBAREA RUNOFF(CFS) =      1.97
```

```
  TOTAL AREA(ACRES) =      0.35   PEAK FLOW RATE(CFS) =      1.97
================================================================================
  END OF STUDY SUMMARY:
  TOTAL AREA(ACRES)     =        0.3  TC(MIN.) =      5.00
  EFFECTIVE AREA(ACRES) =      0.35  AREA-AVERAGED Fm(INCH/HR)=  0.63
  AREA-AVERAGED Fp(INCH/HR) =  0.74  AREA-AVERAGED Ap = 0.850
  PEAK FLOW RATE(CFS)   =       1.97
================================================================================
================================================================================
  END OF RATIONAL METHOD ANALYSIS
```

APPENDIX C

HYDROLOGY MAPS


13TH STREET
FOOTHILL BLVD.
CENTRAL AVE.
FOOTHILL BOULEVARD
400
300
200
100
401
301
201
101
402
302
202
102
303
5.85 AC.
5.55 AC.
5.70 AC.
2.90 AC.
7.20 AC.
7.00 AC.
3.15 AC.
4.50 AC.
L=564'
L=1265'
L=1265'
L=1265



D:\3600-3699\3651\3651HYD.dwg

LEGEND

- PROJECT BOUNDARY
- SUBAREA BOUNDARY
- FLOWLINE
- 1.00 AC. — SUBAREA AREA
- 100 — NODE NUMBER

PREPARED FOR:

BRIDGE DEVELOPMENT PARTNERS
1334 PARKVIEW AVENUE, SUITE 310
MANHATTAN BEACH, CA 90266
PHONE: (213) 805-6350
FAX: (310) 853-8423

Thienes Engineering, Inc.
CIVIL ENGINEERING ■ LAND SURVEYING
14349 FIRESTONE BOULEVARD
LA MIRADA, CALIFORNIA 90638
PH:(714)521-4811 FAX(714)521-4173

CITY OF UPLAND
PUBLIC WORKS DEPARTMENT

PROPOSED CONDITION HYDROLOGY MAP

BRIDGE UPLAND

NE FOOTHILL BLVD AND CENTRAL AVE

Designed by _____ Date _____
Checked by _____ Date _____
Designed by _____ Date _____
Checked by _____ Date _____

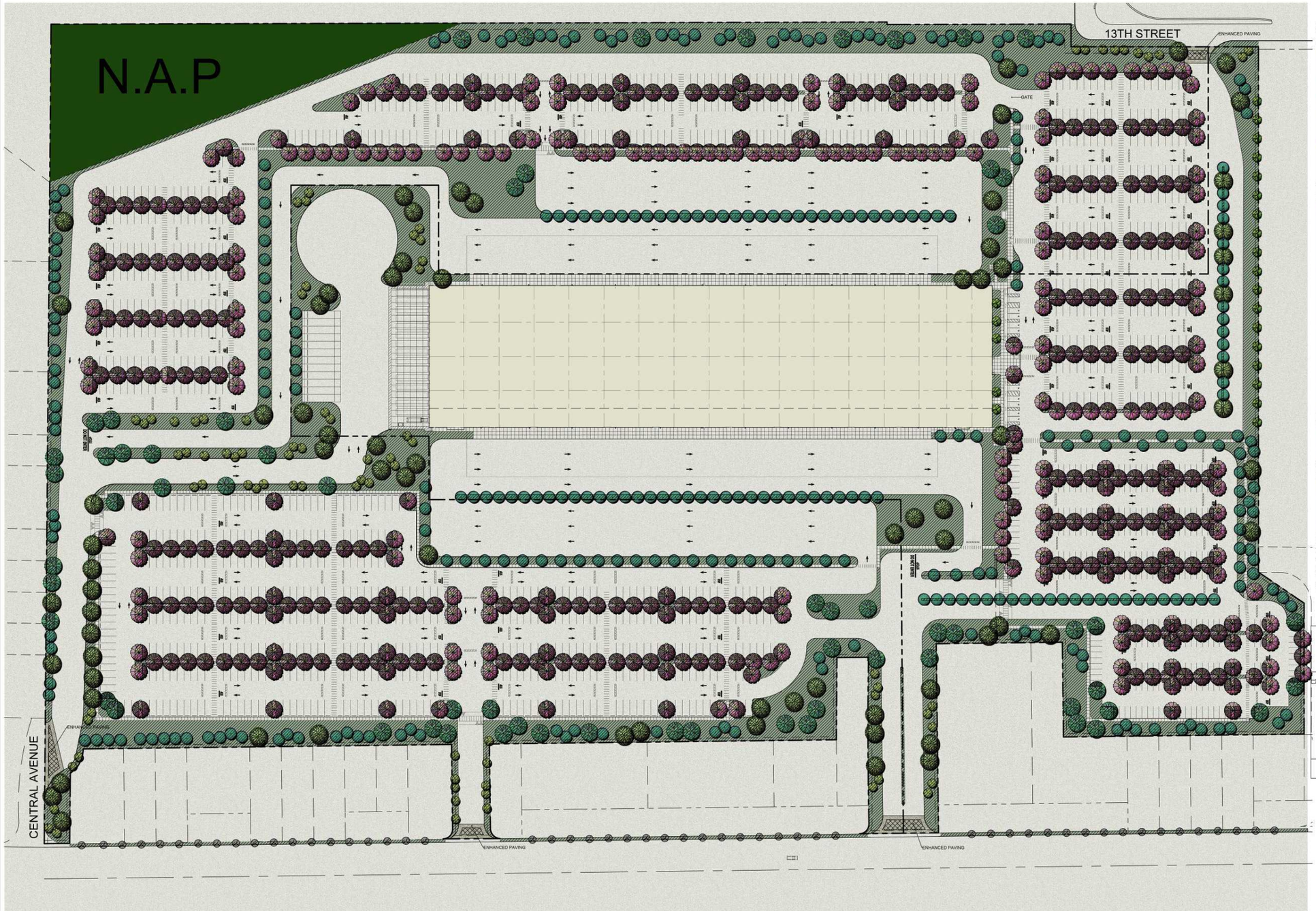
Approved by _____ Date _____
Public Works Director _____ R.C.E. XXXXX

Sheet 1 of 1 Sheets

3561/1 OF 1 SHEET

Attachment 7

Landscape Plan



PLANTING LEGEND

TREES

SYMBOL	BOTANICAL/COMMON NAME	SIZE	QTY	WUCOLS	REMARKS
	Cercis occidentalis Western Redbud	24" Box	80	L	Multi
	Chitalpa tashkentensis Chitalpa	24" Box	454	L	Standard
	Heteromeles arbutifolia Toyon	15 Gal	306	L	Multi
	Platanus racemosa California Sycamore	24" Box	73	M	Multi
	Quercus agrifolia Coast Live Oak	24" Box	63	L	Multi
	Tristania conferta Brisbane Box	24" Box	23	M	
	City Street Tree	24" Box	53	M	

SHRUBS

SYMBOL	BOTANICAL/COMMON NAME	SIZE	SPACING	WUCOLS	REMARKS
	Acca sellowiana Pineapple Guava	5 Gal	3' O.C.	M	
	Baccharis p. 'Centennial' Coyote Bush	5 Gal	4' O.C.	L	
	Callistemon 'Little John' Dwarf Bottle Brush	5 Gal	3' O.C.	M	
	Cassia phyllodenia Silverleaf Cassia	5 Gal	4' O.C.	L	
	Ceanothus spp. California Lilac	5 Gal	4 to 5' O.C.	L	
	Leucophyllum l. 'Texanum Texas Privet	5 Gal	3' O.C.	M	
	Muhlenbergia rigens Deer Grass	5 Gal	4' O.C.	M	
	Penstemon spentabilis Showy Penstemon	5 Gal	3' O.C.	L	
	Rhamnus californica Coffeeberry	5 Gal	4' O.C.	L	
	Rhus spp. Sumac	5 Gal	4 to 5' O.C.	L	
	Ribes sanguineum Red Flowering Currant	5 Gal	4' O.C.	L	
	Romneya coulteri Matilija Poppy	5 Gal	4' O.C.	L	
	Rosmarinus o. 'Tuscan Blue' Rosemary	5 Gal	3' O.C.	L	
	Salvia c. 'Allen Chickering' Allen Chickering Sage	5 Gal	4' O.C.	L	
	Salvia greggii Autumn Sage	5 Gal	3' O.C.	L	
	Salvia leucantha Mexican Sage	5 Gal	4' O.C.	L	
	Salvia mellifera Black Sage	5 Gal	4' O.C.	L	
	Tecoma stans Yellow Bells	5 Gal	6' O.C.	L	
	Westringia fruticosa Coast Rosemary	5 Gal	5' O.C.	L	
	Westringia f. 'Grey Box Dwarf Coast Rosemary	5 Gal	3' O.C.	L	

ACCENTS

SYMBOL	BOTANICAL/COMMON NAME	SIZE		WUCOLS	REMARKS
	Agave parryi Parrys Agave	5 Gal		L	
	Agave Shawii Shawii Agave	5 Gal		L	
	Agave deserti Desert Agave	5 Gal		L	

GROUNDCOVER

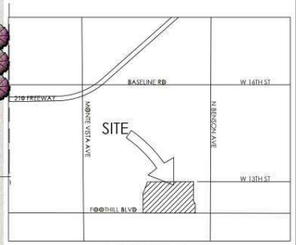
SYMBOL	BOTANICAL/COMMON NAME	SIZE	SPACING	WUCOLS	REMARKS
	Acacia redolens 'Low Boy' Dwarf Acacia	1 Gal	8' O.C.	L	
	Baccharis p. 'Pigeon Point' Dwarf Coyote Bush	1 Gal	8' O.C.	L	
	Carex spissa California Meadow Sedge	4" Pots	12" O.C.	M	
	Rosmarinus o. 'Huntington Carpet' Prostrate Rosemary	1 Gal	48" O.C.	L	

Parking lot area = 1,212,144 sf
Parking lot landscape area = 96,972 sf
Percentage of landscape in parking area 8%

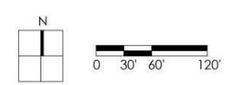
Greater than 50% of the landscaped area will be drought tolerant

Landscape sf = 464,380 sf or Approximately 10 ± Acres
Total trees provided = 1000

1 Tree every 20 linear feet of all narrow and continuous areas 3' to 10' wide.
1 Tree every 500 square feet of landscaping in all other areas.



VICINITY MAP



BRIDGE DEVELOPMENT FOOTHILL BLVD

19-039
04.25.19 11.14.19
09.25.19 11.21.19
10.15.19

Upland, California

HUNTER LANDSCAPE
711 FEE ANA STREET PLACENTIA, CA 92870
714.986.2400 FAX 714.986.2408

Attachment 8

Oct. 9, 2019 CalEEMod AQ/GHG Calculations Consistent with IS/MND

Bridge Point Upland

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	266.82	1000sqft	6.13	266,825.00	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**	2020
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 - 266.8 kSF buildings, 6.53 acres (284 KSF) landscaping, 1,306,800 KSF parking

Construction Phase - anticipated construction schedule

Off-road Equipment - anticipated construction equipment

Off-road Equipment - anticipated construction equipment

Off-road Equipment -

Off-road Equipment - anticipated construction equipment

Off-road Equipment - anticipated construction equipment

Off-road Equipment -

Trips and VMT - Export site is less 1 mile from project site

Demolition -

Grading - Anticipated export

Architectural Coating - low VOC paint mitigation

Vehicle Trips - trip rates from Translutions trip generation report using High Cube Warehouse

Construction Off-road Equipment Mitigation - mitigation per Rule 403

Area Mitigation -

Water Mitigation -

Waste Mitigation -

Operational Off-Road Equipment - anticipated operational equipment

Fleet Mix - Fleet mix from Translutions Traffic Study

Table Name	Column Name	Default Value	New Value
tblConstDustMitigation	CleanPavedRoadPercentReduction	0	6
tblConstDustMitigation	WaterUnpavedRoadMoistureContent	0	12
tblConstDustMitigation	WaterUnpavedRoadVehicleSpeed	0	15
tblConstructionPhase	NumDays	30.00	0.00
tblConstructionPhase	NumDays	20.00	2.00
tblConstructionPhase	NumDays	45.00	35.00
tblConstructionPhase	NumDays	440.00	100.00
tblConstructionPhase	NumDays	35.00	66.00
tblConstructionPhase	NumDays	35.00	14.00
tblFleetMix	HHD	0.06	0.02
tblFleetMix	LDA	0.55	0.23
tblFleetMix	LHD1	0.02	0.38
tblFleetMix	MH	1.0820e-003	0.00
tblFleetMix	OBUS	1.3370e-003	0.00
tblFleetMix	SBUS	8.1700e-004	0.00
tblFleetMix	UBUS	1.6570e-003	0.00

tblGrading	MaterialExported	0.00	431.00
tblLandUse	LandUseSquareFeet	266,820.00	266,825.00
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	OperFuelType	Diesel	CNG
tblOperationalOffRoadEquipment	OperOffRoadEquipmentNumber	0.00	12.00
tblTripsAndVMT	HaulingTripLength	20.00	10.00
tblTripsAndVMT	WorkerTripNumber	33.00	20.00
tblVehicleTrips	ST_TR	49.97	36.50
tblVehicleTrips	ST_TR	1.68	7.94
tblVehicleTrips	SU_TR	25.24	36.50
tblVehicleTrips	SU_TR	1.68	7.94
tblVehicleTrips	WD_TR	42.70	36.50
tblVehicleTrips	WD_TR	1.68	7.94

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	52.1311	85.1995	61.7018	0.1939	18.2675	3.5286	20.4662	9.9840	3.2464	12.0069	0.0000	19,561.3656	19,561.3656	3.4353	0.0000	19,596.9796
Maximum	**52.1311**	**85.1995**	**61.7018**	**0.1939**	**18.2675**	**3.5286**	**20.4662**	**9.9840**	**3.2464**	**12.0069**	**0.0000**	**19,561.3656**	**19,561.3656**	**3.4353**	**0.0000**	**19,596.9796**

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	52.1311	85.1995	61.7018	0.1939	10.0380	3.5286	11.5615	4.2962	3.2464	6.3190	0.0000	19,561.3656	19,561.3656	3.4353	0.0000	19,596.9795
Maximum	**52.1311**	**85.1995**	**61.7018**	**0.1939**	**10.0380**	**3.5286**	**11.5615**	**4.2962**	**3.2464**	**6.3190**	**0.0000**	**19,561.3656**	**19,561.3656**	**3.4353**	**0.0000**	**19,596.9795**

	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**	**45.05**	**0.00**	**43.51**	**56.97**	**0.00**	**47.37**	**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	6.7576	1.0800e-003	0.1169	1.0000e-005		4.2000e-004	4.2000e-004		4.2000e-004	4.2000e-004		0.2490	0.2490	6.7000e-004		0.2657
Energy	0.0167	0.1515	0.1272	9.1000e-004		0.0115	0.0115		0.0115	0.0115		181.7421	181.7421	3.4800e-003	3.3300e-003	182.8221
Mobile	8.3086	70.3239	94.6903	0.3179	21.6738	0.4846	22.1584	5.9052	0.4603	6.3655		32,204.5657	32,204.5657	1.2062		32,234.7218
Offroad	1.7281	15.5700	14.1632	0.0183		1.1600	1.1600		1.0672	1.0672		1,776.3700	1,776.3700	0.5745		1,790.7328

Total	**16.8110**	**86.0465**	**109.0976**	**0.3372**	**21.6738**	**1.6565**	**23.3303**	**5.9052**	**1.5394**	**7.4446**		**34,162.9268**	**34,162.9268**	**1.7849**	**3.3300e-003**	**34,208.5424**

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	6.7576	1.0800e-003	0.1169	1.0000e-005		4.2000e-004	4.2000e-004		4.2000e-004	4.2000e-004		0.2490	0.2490	6.7000e-004		0.2657
Energy	0.0167	0.1515	0.1272	9.1000e-004		0.0115	0.0115		0.0115	0.0115		181.7421	181.7421	3.4800e-003	3.3300e-003	182.8221
Mobile	8.3086	70.3239	94.6903	0.3179	21.6738	0.4846	22.1584	5.9052	0.4603	6.3655		32,204.5657	32,204.5657	1.2062		32,234.7218
Offroad	1.7281	15.5700	14.1632	0.0183		1.1600	1.1600		1.0672	1.0672		1,776.3700	1,776.3700	0.5745		1,790.7328
Total	**16.8110**	**86.0465**	**109.0976**	**0.3372**	**21.6738**	**1.6565**	**23.3303**	**5.9052**	**1.5394**	**7.4446**		**34,162.9268**	**34,162.9268**	**1.7849**	**3.3300e-003**	**34,208.5424**

	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

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	8/11/2020	5	100	
5	Architectural Coating	Architectural Coating	6/1/2020	8/31/2020	5	66	
6	Paving	Paving	8/12/2020	8/31/2020	5	14	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 175

Acres of Paving: 19.77

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 415,238; Non-Residential Outdoor: 138,413; Striped Parking Area:

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	4	8.00	158	0.38
Grading	Graders	2	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	4	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
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
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	2	6.00	78	0.48

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
Demolition	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
Grading	13	20.00	0.00	54.00	14.70	6.90	10.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	664.00	260.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	2	133.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Replace Ground Cover

Water Exposed Area

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					
Fugitive Dust	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
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**

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					
Fugitive Dust	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
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**

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**

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					7.7233	0.0000	7.7233	4.2454	0.0000	4.2454			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**	**7.7233**	**2.1974**	**9.9207**	**4.2454**	**2.0216**	**6.2670**	**0.0000**	**3,685.1016**	**3,685.1016**	**1.1918**		**3,714.8975**

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					11.3260	0.0000	11.3260	3.8830	0.0000	3.8830			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**	**11.3260**	**3.5266**	**14.8526**	**3.8830**	**3.2445**	**7.1274**		**10,582.8510**	**10,582.8510**	**3.4227**		**10,668.4187**

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					4.8419	0.0000	4.8419	1.6600	0.0000	1.6600			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**	**4.8419**	**3.5266**	**8.3685**	**1.6600**	**3.2445**	**4.9044**	**0.0000**	**10,582.8510**	**10,582.8510**	**3.4227**		**10,668.4187**

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**

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	0.7893	27.4375	5.3472	0.0705	1.6653	0.1263	1.7915	0.4795	0.1208	0.6003		7,438.6360	7,438.6360	0.4832		7,450.7151
Worker	3.6240	2.3259	29.8619	0.0754	7.4220	0.0486	7.4706	1.9683	0.0448	2.0131		7,503.7586	7,503.7586	0.2291		7,509.4854
Total	**4.4133**	**29.7633**	**35.2091**	**0.1459**	**9.0872**	**0.1749**	**9.2621**	**2.4478**	**0.1656**	**2.6134**		**14,942.3946**	**14,942.3946**	**0.7122**		**14,960.2005**

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**

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	0.7893	27.4375	5.3472	0.0705	1.5941	0.1263	1.7204	0.4620	0.1208	0.5828		7,438.6360	7,438.6360	0.4832		7,450.7151
Worker	3.6240	2.3259	29.8619	0.0754	7.0348	0.0486	7.0834	1.8733	0.0448	1.9181		7,503.7586	7,503.7586	0.2291		7,509.4854
Total	**4.4133**	**29.7633**	**35.2091**	**0.1459**	**8.6289**	**0.1749**	**8.8038**	**2.3353**	**0.1656**	**2.5009**		**14,942.3946**	**14,942.3946**	**0.7122**		**14,960.2005**

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	44.3878					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	**44.8721**	**3.3677**	**3.6628**	**5.9400e-003**		**0.2219**	**0.2219**		**0.2219**	**0.2219**		**562.8961**	**562.8961**	**0.0436**		**563.9856**

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	0.7259	0.4659	5.9814	0.0151	1.4866	9.7400e-003	1.4964	0.3943	8.9700e-003	0.4032		1,503.0119	1,503.0119	0.0459		1,504.1590
Total	**0.7259**	**0.4659**	**5.9814**	**0.0151**	**1.4866**	**9.7400e-003**	**1.4964**	**0.3943**	**8.9700e-003**	**0.4032**		**1,503.0119**	**1,503.0119**	**0.0459**		**1,504.1590**

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	44.3878					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	**44.8721**	**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**

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	0.7259	0.4659	5.9814	0.0151	1.4091	9.7400e-003	1.4188	0.3752	8.9700e-003	0.3842		1,503.0119	1,503.0119	0.0459		1,504.1590
Total	**0.7259**	**0.4659**	**5.9814**	**0.0151**	**1.4091**	**9.7400e-003**	**1.4188**	**0.3752**	**8.9700e-003**	**0.3842**		**1,503.0119**	**1,503.0119**	**0.0459**		**1,504.1590**

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	3.6998					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**5.0564**	**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**

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	3.6998					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**5.0564**	**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**

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	8.3086	70.3239	94.6903	0.3179	21.6738	0.4846	22.1584	5.9052	0.4603	6.3655		32,204.5657	32,204.5657	1.2062		32,234.7218
Unmitigated	8.3086	70.3239	94.6903	0.3179	21.6738	0.4846	22.1584	5.9052	0.4603	6.3655		32,204.5657	32,204.5657	1.2062		32,234.7218

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	365.00	365.00	365.00	789,438	789,438
Unrefrigerated Warehouse-No Rail	2,118.55	2,118.55	2118.55	9,079,509	9,079,509
Total	2,483.55	2,483.55	2,483.55	9,868,947	9,868,947

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-	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	6.90	59.00	0.00	41.00	92	5	3

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Parking Lot	0.546179	0.037976	0.179086	0.122965	0.018430	0.005460	0.017497	0.061396	0.001337	0.001657	0.006117	0.000817	0.001082
Regional Shopping Center	0.546179	0.037976	0.179086	0.122965	0.018430	0.005460	0.017497	0.061396	0.001337	0.001657	0.006117	0.000817	0.001082
Unrefrigerated Warehouse-No Rail	0.227299	0.037976	0.179086	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	0.0167	0.1515	0.1272	9.1000e-004		0.0115	0.0115		0.0115	0.0115		181.7421	181.7421	3.4800e-003	3.3300e-003	182.8221
NaturalGas Unmitigated	0.0167	0.1515	0.1272	9.1000e-004		0.0115	0.0115		0.0115	0.0115		181.7421	181.7421	3.4800e-003	3.3300e-003	182.8221

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	1483.99	0.0160	0.1455	0.1222	8.7000e-004		0.0111	0.0111		0.0111	0.0111		174.5865	174.5865	3.3500e-003	3.2000e-003	175.6240
Total		**0.0167**	**0.1515**	**0.1272**	**9.1000e-004**		**0.0115**	**0.0115**		**0.0115**	**0.0115**		**181.7421**	**181.7421**	**3.4900e-003**	**3.3300e-003**	**182.8221**

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	1.48399	0.0160	0.1455	0.1222	8.7000e-004		0.0111	0.0111		0.0111	0.0111		174.5865	174.5865	3.3500e-003	3.2000e-003	175.6240
Total		**0.0167**	**0.1515**	**0.1272**	**9.1000e-004**		**0.0115**	**0.0115**		**0.0115**	**0.0115**		**181.7421**	**181.7421**	**3.4900e-003**	**3.3300e-003**	**182.8221**

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	6.7576	1.0800e-003	0.1169	1.0000e-005		4.2000e-004	4.2000e-004		4.2000e-004	4.2000e-004		0.2490	0.2490	6.7000e-004		0.2657
Unmitigated	6.7576	1.0800e-003	0.1169	1.0000e-005		4.2000e-004	4.2000e-004		4.2000e-004	4.2000e-004		0.2490	0.2490	6.7000e-004		0.2657

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	0.8026					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	5.9440					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	0.0110	1.0800e-003	0.1169	1.0000e-005		4.2000e-004	4.2000e-004		4.2000e-004	4.2000e-004		0.2490	0.2490	6.7000e-004		0.2657

Total	**6.7576**	**1.0800e-003**	**0.1169**	**1.0000e-005**		**4.2000e-004**	**4.2000e-004**		**4.2000e-004**	**4.2000e-004**		**0.2490**	**0.2490**	**6.7000e-004**		**0.2657**

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	0.8026					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	5.9440					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	0.0110	1.0800e-003	0.1169	1.0000e-005		4.2000e-004	4.2000e-004		4.2000e-004	4.2000e-004		0.2490	0.2490	6.7000e-004		0.2657
Total	**6.7576**	**1.0800e-003**	**0.1169**	**1.0000e-005**		**4.2000e-004**	**4.2000e-004**		**4.2000e-004**	**4.2000e-004**		**0.2490**	**0.2490**	**6.7000e-004**		**0.2657**

7.0 Water Detail

7.1 Mitigation Measures Water

Install Low Flow Bathroom Faucet

Install Low Flow Kitchen Faucet

Install Low Flow Toilet

Install Low Flow Shower

Use Water Efficient Irrigation System

8.0 Waste Detail

8.1 Mitigation Measures Waste

Institute Recycling and Composting Services

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
Forklifts	12	8.00	260	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	1.7281	15.5700	14.1632	0.0183		1.1600	1.1600		1.0672	1.0672		1,776.3700	1,776.3700	0.5745		1,790.7328
Total	**1.7281**	**15.5700**	**14.1632**	**0.0183**		**1.1600**	**1.1600**		**1.0672**	**1.0672**		**1,776.3700**	**1,776.3700**	**0.5745**		**1,790.7328**

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

Bridge Point Upland

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	266.82	1000sqft	6.13	266,825.00	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**	2020
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 - 266.8 kSF buildings, 6.53 acres (284 KSF) landscaping, 1,306,800 KSF parking

Construction Phase - anticipated construction schedule

Off-road Equipment - anticipated construction equipment

Off-road Equipment - anticipated construction equipment

Off-road Equipment -

Off-road Equipment - anticipated construction equipment

Off-road Equipment - anticipated construction equipment

Off-road Equipment -

Trips and VMT - Export site is less 1 mile from project site

Demolition -

Grading - Anticipated export

Architectural Coating - low VOC paint mitigation

Vehicle Trips - trip rates from Translutions trip generation report using High Cube Warehouse

Construction Off-road Equipment Mitigation - mitigation per Rule 403

Area Mitigation -

Water Mitigation -

Waste Mitigation -

Operational Off-Road Equipment - anticipated operational equipment

Fleet Mix - Fleet mix from Translutions Traffic Study

Table Name	Column Name	Default Value	New Value
tblConstDustMitigation	CleanPavedRoadPercentReduction	0	6
tblConstDustMitigation	WaterUnpavedRoadMoistureContent	0	12
tblConstDustMitigation	WaterUnpavedRoadVehicleSpeed	0	15
tblConstructionPhase	NumDays	30.00	0.00
tblConstructionPhase	NumDays	20.00	2.00
tblConstructionPhase	NumDays	45.00	35.00
tblConstructionPhase	NumDays	440.00	100.00
tblConstructionPhase	NumDays	35.00	66.00
tblConstructionPhase	NumDays	35.00	14.00
tblFleetMix	HHD	0.06	0.02
tblFleetMix	LDA	0.55	0.23
tblFleetMix	LHD1	0.02	0.38
tblFleetMix	MH	1.0820e-003	0.00
tblFleetMix	OBUS	1.3370e-003	0.00
tblFleetMix	SBUS	8.1700e-004	0.00
tblFleetMix	UBUS	1.6570e-003	0.00

tblGrading	MaterialExported	0.00	431.00
tblLandUse	LandUseSquareFeet	266,820.00	266,825.00
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	OperFuelType	Diesel	CNG
tblOperationalOffRoadEquipment	OperOffRoadEquipmentNumber	0.00	12.00
tblTripsAndVMT	HaulingTripLength	20.00	10.00
tblTripsAndVMT	WorkerTripNumber	33.00	20.00
tblVehicleTrips	ST_TR	49.97	36.50
tblVehicleTrips	ST_TR	1.68	7.94
tblVehicleTrips	SU_TR	25.24	36.50
tblVehicleTrips	SU_TR	1.68	7.94
tblVehicleTrips	WD_TR	42.70	36.50
tblVehicleTrips	WD_TR	1.68	7.94

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	52.1766	85.2004	56.1678	0.1818	18.2675	3.5287	20.4662	9.9840	3.2464	12.0069	0.0000	18,345.5478	18,345.5478	3.4351	0.0000	18,381.5937
Maximum	**52.1766**	**85.2004**	**56.1678**	**0.1818**	**18.2675**	**3.5287**	**20.4662**	**9.9840**	**3.2464**	**12.0069**	**0.0000**	**18,345.5478**	**18,345.5478**	**3.4351**	**0.0000**	**18,381.5937**

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	52.1766	85.2004	56.1678	0.1818	10.0380	3.5287	11.5631	4.2962	3.2464	6.3190	0.0000	18,345.5478	18,345.5478	3.4351	0.0000	18,381.5937
Maximum	**52.1766**	**85.2004**	**56.1678**	**0.1818**	**10.0380**	**3.5287**	**11.5631**	**4.2962**	**3.2464**	**6.3190**	**0.0000**	**18,345.5478**	**18,345.5478**	**3.4351**	**0.0000**	**18,381.5937**

	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**	**45.05**	**0.00**	**43.50**	**56.97**	**0.00**	**47.37**	**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	6.7576	1.0800e-003	0.1169	1.0000e-005		4.2000e-004	4.2000e-004		4.2000e-004	4.2000e-004		0.2490	0.2490	6.7000e-004		0.2657
Energy	0.0167	0.1515	0.1272	9.1000e-004		0.0115	0.0115		0.0115	0.0115		181.7421	181.7421	3.4800e-003	3.3300e-003	182.8221
Mobile	7.7208	72.9813	85.9679	0.3020	21.6738	0.4854	22.1592	5.9052	0.4611	6.3663		30,615.8047	30,615.8047	1.1856		30,645.4436
Offroad	1.7281	15.5700	14.1632	0.0183		1.1600	1.1600		1.0672	1.0672		1,776.3700	1,776.3700	0.5745		1,790.7328

Total	**16.2232**	**88.7039**	**100.3752**	**0.3212**	**21.6738**	**1.6573**	**23.3311**	**5.9052**	**1.5402**	**7.4454**		**32,574.16 58**	**32,574.165 8**	**1.7642**	**3.3300e-003**	**32,619.26 42**

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	6.7576	1.0800e-003	0.1169	1.0000e-005		4.2000e-004	4.2000e-004		4.2000e-004	4.2000e-004		0.2490	0.2490	6.7000e-004		0.2657
Energy	0.0167	0.1515	0.1272	9.1000e-004		0.0115	0.0115		0.0115	0.0115		181.7421	181.7421	3.4800e-003	3.3300e-003	182.8221
Mobile	7.7208	72.9813	85.9679	0.3020	21.6738	0.4854	22.1592	5.9052	0.4611	6.3663		30,615.80 47	30,615.804 7	1.1856		30,645.44 36
Offroad	1.7281	15.5700	14.1632	0.0183		1.1600	1.1600		1.0672	1.0672		1,776.370 0	1,776.3700	0.5745		1,790.732 8
Total	**16.2232**	**88.7039**	**100.3752**	**0.3212**	**21.6738**	**1.6573**	**23.3311**	**5.9052**	**1.5402**	**7.4454**		**32,574.16 58**	**32,574.165 8**	**1.7642**	**3.3300e-003**	**32,619.26 42**

	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

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	8/11/2020	5	100	
5	Architectural Coating	Architectural Coating	6/1/2020	8/31/2020	5	66	
6	Paving	Paving	8/12/2020	8/31/2020	5	14	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 175

Acres of Paving: 19.77

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 415,238; Non-Residential Outdoor: 138,413; Striped Parking Area:

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	4	8.00	158	0.38
Grading	Graders	2	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	4	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
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
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	2	6.00	78	0.48

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
Demolition	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
Grading	13	20.00	0.00	54.00	14.70	6.90	10.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	664.00	260.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	2	133.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Replace Ground Cover

Water Exposed Area

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					
Fugitive Dust	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
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**

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					
Fugitive Dust	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
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**

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**

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					7.7233	0.0000	7.7233	4.2454	0.0000	4.2454			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**	**7.7233**	**2.1974**	**9.9207**	**4.2454**	**2.0216**	**6.2670**	**0.0000**	**3,685.1016**	**3,685.1016**	**1.1918**		**3,714.8975**

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					11.3260	0.0000	11.3260	3.8830	0.0000	3.8830			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**	**11.3260**	**3.5266**	**14.8526**	**3.8830**	**3.2445**	**7.1274**		**10,582.8510**	**10,582.8510**	**3.4227**		**10,668.4187**

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					4.8419	0.0000	4.8419	1.6600	0.0000	1.6600			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**	**4.8419**	**3.5266**	**8.3685**	**1.6600**	**3.2445**	**4.9044**	**0.0000**	**10,582.8510**	**10,582.8510**	**3.4227**		**10,668.4187**

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**

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	0.8324	27.2149	6.1975	0.0678	1.6653	0.1279	1.7931	0.4795	0.1223	0.6018		7,150.0028	7,150.0028	0.5342		7,163.3579
Worker	3.6259	2.4474	24.5430	0.0676	7.4220	0.0486	7.4706	1.9683	0.0448	2.0131		6,731.2986	6,731.2986	0.2010		6,736.3223
Total	**4.4584**	**29.6623**	**30.7405**	**0.1354**	**9.0872**	**0.1765**	**9.2637**	**2.4478**	**0.1671**	**2.6149**		**13,881.3014**	**13,881.3014**	**0.7352**		**13,899.6801**

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**

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	0.8324	27.2149	6.1975	0.0678	1.5941	0.1279	1.7220	0.4620	0.1223	0.5843		7,150.0028	7,150.0028	0.5342		7,163.3579
Worker	3.6259	2.4474	24.5430	0.0676	7.0348	0.0486	7.0834	1.8733	0.0448	1.9181		6,731.2986	6,731.2986	0.2010		6,736.3223
Total	**4.4584**	**29.6623**	**30.7405**	**0.1354**	**8.6289**	**0.1765**	**8.8054**	**2.3353**	**0.1671**	**2.5024**		**13,881.3014**	**13,881.3014**	**0.7352**		**13,899.6801**

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	44.3878					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	**44.8721**	**3.3677**	**3.6628**	**5.9400e-003**		**0.2219**	**0.2219**		**0.2219**	**0.2219**		**562.8961**	**562.8961**	**0.0436**		**563.9856**

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	0.7263	0.4902	4.9160	0.0135	1.4866	9.7400e-003	1.4964	0.3943	8.9700e-003	0.4032		1,348.2872	1,348.2872	0.0403		1,349.2935
Total	**0.7263**	**0.4902**	**4.9160**	**0.0135**	**1.4866**	**9.7400e-003**	**1.4964**	**0.3943**	**8.9700e-003**	**0.4032**		**1,348.2872**	**1,348.2872**	**0.0403**		**1,349.2935**

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	44.3878					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	**44.8721**	**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**

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	0.7263	0.4902	4.9160	0.0135	1.4091	9.7400e-003	1.4188	0.3752	8.9700e-003	0.3842		1,348.2872	1,348.2872	0.0403		1,349.2935
Total	**0.7263**	**0.4902**	**4.9160**	**0.0135**	**1.4091**	**9.7400e-003**	**1.4188**	**0.3752**	**8.9700e-003**	**0.3842**		**1,348.2872**	**1,348.2872**	**0.0403**		**1,349.2935**

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	3.6998					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**5.0564**	**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**

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	3.6998					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**5.0564**	**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**

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	7.7208	72.9813	85.9679	0.3020	21.6738	0.4854	22.1592	5.9052	0.4611	6.3663		30,615.8047	30,615.8047	1.1856		30,645.4436
Unmitigated	7.7208	72.9813	85.9679	0.3020	21.6738	0.4854	22.1592	5.9052	0.4611	6.3663		30,615.8047	30,615.8047	1.1856		30,645.4436

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	365.00	365.00	365.00	789,438	789,438
Unrefrigerated Warehouse-No Rail	2,118.55	2,118.55	2118.55	9,079,509	9,079,509
Total	2,483.55	2,483.55	2,483.55	9,868,947	9,868,947

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-	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	6.90	59.00	0.00	41.00	92	5	3

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Parking Lot	0.546179	0.037976	0.179086	0.122965	0.018430	0.005460	0.017497	0.061396	0.001337	0.001657	0.006117	0.000817	0.001082
Regional Shopping Center	0.546179	0.037976	0.179086	0.122965	0.018430	0.005460	0.017497	0.061396	0.001337	0.001657	0.006117	0.000817	0.001082
Unrefrigerated Warehouse-No Rail	0.227299	0.037976	0.179086	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	0.0167	0.1515	0.1272	9.1000e-004		0.0115	0.0115		0.0115	0.0115		181.7421	181.7421	3.4800e-003	3.3300e-003	182.8221
NaturalGas Unmitigated	0.0167	0.1515	0.1272	9.1000e-004		0.0115	0.0115		0.0115	0.0115		181.7421	181.7421	3.4800e-003	3.3300e-003	182.8221

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	1483.99	0.0160	0.1455	0.1222	8.7000e-004		0.0111	0.0111		0.0111	0.0111		174.5865	174.5865	3.3500e-003	3.2000e-003	175.6240
Total		**0.0167**	**0.1515**	**0.1272**	**9.1000e-004**		**0.0115**	**0.0115**		**0.0115**	**0.0115**		**181.7421**	**181.7421**	**3.4900e-003**	**3.3300e-003**	**182.8221**

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	1.48399	0.0160	0.1455	0.1222	8.7000e-004		0.0111	0.0111		0.0111	0.0111		174.5865	174.5865	3.3500e-003	3.2000e-003	175.6240
Total		**0.0167**	**0.1515**	**0.1272**	**9.1000e-004**		**0.0115**	**0.0115**		**0.0115**	**0.0115**		**181.7421**	**181.7421**	**3.4900e-003**	**3.3300e-003**	**182.8221**

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	6.7576	1.0800e-003	0.1169	1.0000e-005		4.2000e-004	4.2000e-004		4.2000e-004	4.2000e-004		0.2490	0.2490	6.7000e-004		0.2657
Unmitigated	6.7576	1.0800e-003	0.1169	1.0000e-005		4.2000e-004	4.2000e-004		4.2000e-004	4.2000e-004		0.2490	0.2490	6.7000e-004		0.2657

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	0.8026					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	5.9440					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	0.0110	1.0800e-003	0.1169	1.0000e-005		4.2000e-004	4.2000e-004		4.2000e-004	4.2000e-004		0.2490	0.2490	6.7000e-004		0.2657

Total	**6.7576**	**1.0800e-003**	**0.1169**	**1.0000e-005**		**4.2000e-004**	**4.2000e-004**		**4.2000e-004**	**4.2000e-004**		**0.2490**	**0.2490**	**6.7000e-004**		**0.2657**

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	0.8026					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	5.9440					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	0.0110	1.0800e-003	0.1169	1.0000e-005		4.2000e-004	4.2000e-004		4.2000e-004	4.2000e-004		0.2490	0.2490	6.7000e-004		0.2657
Total	**6.7576**	**1.0800e-003**	**0.1169**	**1.0000e-005**		**4.2000e-004**	**4.2000e-004**		**4.2000e-004**	**4.2000e-004**		**0.2490**	**0.2490**	**6.7000e-004**		**0.2657**

7.0 Water Detail

7.1 Mitigation Measures Water

Install Low Flow Bathroom Faucet

Install Low Flow Kitchen Faucet

Install Low Flow Toilet

Install Low Flow Shower

Use Water Efficient Irrigation System

8.0 Waste Detail

8.1 Mitigation Measures Waste

Institute Recycling and Composting Services

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
Forklifts	12	8.00	260	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	1.7281	15.5700	14.1632	0.0183		1.1600	1.1600		1.0672	1.0672		1,776.3700	1,776.3700	0.5745		1,790.7328
Total	**1.7281**	**15.5700**	**14.1632**	**0.0183**		**1.1600**	**1.1600**		**1.0672**	**1.0672**		**1,776.3700**	**1,776.3700**	**0.5745**		**1,790.7328**

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

Bridge Point Upland

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	266.82	1000sqft	6.13	266,825.00	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**	2020
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 - 266.8 kSF buildings, 6.53 acres (284 KSF) landscaping, 1,306,800 KSF parking

Construction Phase - anticipated construction schedule

Off-road Equipment - anticipated construction equipment

Off-road Equipment - anticipated construction equipment

Off-road Equipment -

Off-road Equipment - anticipated construction equipment

Off-road Equipment - anticipated construction equipment

Off-road Equipment -

Trips and VMT - Export site is less 1 mile from project site

Demolition -

Grading - Anticipated export

Architectural Coating - low VOC paint mitigation

Vehicle Trips - trip rates from Translutions trip generation report using High Cube Warehouse

Construction Off-road Equipment Mitigation - mitigation per Rule 403

Area Mitigation -

Water Mitigation -

Waste Mitigation -

Operational Off-Road Equipment - anticipated operational equipment

Fleet Mix - Fleet mix from Translutions Traffic Study

Table Name	Column Name	Default Value	New Value
tblConstDustMitigation	CleanPavedRoadPercentReduction	0	6
tblConstDustMitigation	WaterUnpavedRoadMoistureContent	0	12
tblConstDustMitigation	WaterUnpavedRoadVehicleSpeed	0	15
tblConstructionPhase	NumDays	30.00	0.00
tblConstructionPhase	NumDays	20.00	2.00
tblConstructionPhase	NumDays	45.00	35.00
tblConstructionPhase	NumDays	440.00	100.00
tblConstructionPhase	NumDays	35.00	66.00
tblConstructionPhase	NumDays	35.00	14.00
tblFleetMix	HHD	0.06	0.02
tblFleetMix	LDA	0.55	0.23
tblFleetMix	LHD1	0.02	0.38
tblFleetMix	MH	1.0820e-003	0.00
tblFleetMix	OBUS	1.3370e-003	0.00
tblFleetMix	SBUS	8.1700e-004	0.00
tblFleetMix	UBUS	1.6570e-003	0.00

tblGrading	MaterialExported	0.00	431.00
tblLandUse	LandUseSquareFeet	266,820.00	266,825.00
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	OperFuelType	Diesel	CNG
tblOperationalOffRoadEquipment	OperOffRoadEquipmentNumber	0.00	12.00
tblTripsAndVMT	HaulingTripLength	20.00	10.00
tblTripsAndVMT	WorkerTripNumber	33.00	20.00
tblVehicleTrips	ST_TR	49.97	36.50
tblVehicleTrips	ST_TR	1.68	7.94
tblVehicleTrips	SU_TR	25.24	36.50
tblVehicleTrips	SU_TR	1.68	7.94
tblVehicleTrips	WD_TR	42.70	36.50
tblVehicleTrips	WD_TR	1.68	7.94

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	1.9843	4.2367	3.8210	0.0111	0.7158	0.1415	0.8573	0.2124	0.1321	0.3446	0.0000	1,008.8594	1,008.8594	0.1233	0.0000	1,011.9423
Maximum	**1.9843**	**4.2367**	**3.8210**	**0.0111**	**0.7158**	**0.1415**	**0.8573**	**0.2124**	**0.1321**	**0.3446**	**0.0000**	**1,008.8594**	**1,008.8594**	**0.1233**	**0.0000**	**1,011.9423**

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	1.9843	4.2367	3.8210	0.0111	0.5668	0.1415	0.7083	0.1617	0.1321	0.2938	0.0000	1,008.8590	1,008.8590	0.1233	0.0000	1,011.9419
Maximum	**1.9843**	**4.2367**	**3.8210**	**0.0111**	**0.5668**	**0.1415**	**0.7083**	**0.1617**	**0.1321**	**0.2938**	**0.0000**	**1,008.8590**	**1,008.8590**	**0.1233**	**0.0000**	**1,011.9419**

	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**	**20.82**	**0.00**	**17.38**	**23.90**	**0.00**	**14.74**	**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**	2.4222	2.4222
2	**5-1-2020**	**7-31-2020**	2.8999	2.8999
3	**8-1-2020**	**9-30-2020**	0.9028	0.9028
		Highest	2.8999	2.8999

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	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	8.0000e-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	0.0165	3.8500e-003	418.2625
Mobile	1.3769	13.5321	16.0509	0.0556	3.8731	0.0882	3.9613	1.0572	0.0837	1.1409	0.0000	5,109.0598	5,109.0598	0.1948	0.0000	5,113.9303
Offroad	0.2247	2.0241	1.8412	2.3800e-003		0.1508	0.1508		0.1387	0.1387	0.0000	209.4944	209.4944	0.0678	0.0000	211.1883
Waste						0.0000	0.0000		0.0000	0.0000	53.0436	0.0000	53.0436	3.1348	0.0000	131.4132
Water						0.0000	0.0000		0.0000	0.0000	19.8102	260.6681	280.4783	2.0455	0.0503	346.5954
Total	**2.8373**	**15.5840**	**17.9300**	**0.0581**	**3.8731**	**0.2411**	**4.1142**	**1.0572**	**0.2246**	**1.2818**	**72.8538**	**5,995.9511**	**6,068.8049**	**5.4594**	**0.0541**	**6,221.4198**

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	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	8.0000e-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	0.0165	3.8500e-003	418.2625
Mobile	1.3769	13.5321	16.0509	0.0556	3.8731	0.0882	3.9613	1.0572	0.0837	1.1409	0.0000	5,109.0598	5,109.0598	0.1948	0.0000	5,113.9303
Offroad	0.2247	2.0241	1.8412	2.3800e-003		0.1508	0.1508		0.1387	0.1387	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	1.5674	0.0000	65.7066
Water						0.0000	0.0000		0.0000	0.0000	15.8482	208.7579	224.6060	1.6364	0.0402	277.5005
Total	**2.8373**	**15.5840**	**17.9300**	**0.0581**	**3.8731**	**0.2411**	**4.1142**	**1.0572**	**0.2246**	**1.2818**	**42.3700**	**5,944.0409**	**5,986.4108**	**3.4830**	**0.0441**	**6,086.6183**

	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**	**41.84**	**0.87**	**1.36**	**36.20**	**18.57**	**2.17**

3.0 Construction Detail

Construction Phase

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	8/11/2020	5	100	
5	Architectural Coating	Architectural Coating	6/1/2020	8/31/2020	5	66	
6	Paving	Paving	8/12/2020	8/31/2020	5	14	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 175

Acres of Paving: 19.77

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 415,238; Non-Residential Outdoor: 138,413; Striped Parking Area:

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	4	8.00	158	0.38
Grading	Graders	2	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	4	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
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
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	2	6.00	78	0.48

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
Demolition	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
Grading	13	20.00	0.00	54.00	14.70	6.90	10.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	664.00	260.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	2	133.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Replace Ground Cover

Water Exposed Area

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					
Fugitive Dust	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
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**

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					
Fugitive Dust	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

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**

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**

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					7.7200e-003	0.0000	7.7200e-003	4.2500e-003	0.0000	4.2500e-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**	**7.7200e-003**	**2.2000e-003**	**9.9200e-003**	**4.2500e-003**	**2.0200e-003**	**6.2700e-003**	**0.0000**	**3.3431**	**3.3431**	**1.0800e-003**	**0.0000**	**3.3701**

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					0.1982	0.0000	0.1982	0.0680	0.0000	0.0680	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**	**0.1982**	**0.0617**	**0.2599**	**0.0680**	**0.0568**	**0.1247**	**0.0000**	**168.0105**	**168.0105**	**0.0543**	**0.0000**	**169.3690**

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					0.0847	0.0000	0.0847	0.0291	0.0000	0.0291	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**	**0.0847**	**0.0617**	**0.1465**	**0.0291**	**0.0568**	**0.0858**	**0.0000**	**168.0103**	**168.0103**	**0.0543**	**0.0000**	**169.3688**

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	0.1060	0.9593	0.8424	1.3500e-003		0.0559	0.0559		0.0525	0.0525	0.0000	115.8050	115.8050	0.0283	0.0000	116.5113
Total	**0.1060**	**0.9593**	**0.8424**	**1.3500e-003**		**0.0559**	**0.0559**		**0.0525**	**0.0525**	**0.0000**	**115.8050**	**115.8050**	**0.0283**	**0.0000**	**116.5113**

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	0.0403	1.3878	0.2902	3.4700e-003	0.0820	6.3500e-003	0.0883	0.0237	6.0700e-003	0.0297	0.0000	331.9122	331.9122	0.0230	0.0000	332.4864
Worker	0.1640	0.1289	1.2877	3.4500e-003	0.3640	2.4300e-003	0.3665	0.0967	2.2400e-003	0.0989	0.0000	312.0203	312.0203	9.3700e-003	0.0000	312.2545
Total	**0.2043**	**1.5167**	**1.5779**	**6.9200e-003**	**0.4460**	**8.7800e-003**	**0.4548**	**0.1203**	**8.3100e-003**	**0.1287**	**0.0000**	**643.9325**	**643.9325**	**0.0323**	**0.0000**	**644.7409**

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	0.1060	0.9593	0.8424	1.3500e-003		0.0559	0.0559		0.0525	0.0525	0.0000	115.8049	115.8049	0.0283	0.0000	116.5112

Total	**0.1060**	**0.9593**	**0.8424**	**1.3500e-003**		**0.0559**	**0.0559**		**0.0525**	**0.0525**	**0.0000**	**115.8049**	**115.8049**	**0.0283**	**0.0000**	**116.5112**

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	0.0403	1.3878	0.2902	3.4700e-003	0.0785	6.3500e-003	0.0848	0.0228	6.0700e-003	0.0289	0.0000	331.9122	331.9122	0.0230	0.0000	332.4864
Worker	0.1640	0.1289	1.2877	3.4500e-003	0.3451	2.4300e-003	0.3475	0.0920	2.2400e-003	0.0943	0.0000	312.0203	312.0203	9.3700e-003	0.0000	312.2545
Total	**0.2043**	**1.5167**	**1.5779**	**6.9200e-003**	**0.4236**	**8.7800e-003**	**0.4324**	**0.1148**	**8.3100e-003**	**0.1231**	**0.0000**	**643.9325**	**643.9325**	**0.0323**	**0.0000**	**644.7409**

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	1.4648					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	**1.4808**	**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**

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	0.0217	0.0170	0.1702	4.6000e-004	0.0481	3.2000e-004	0.0485	0.0128	3.0000e-004	0.0131	0.0000	41.2487	41.2487	1.2400e-003	0.0000	41.2797
Total	**0.0217**	**0.0170**	**0.1702**	**4.6000e-004**	**0.0481**	**3.2000e-004**	**0.0485**	**0.0128**	**3.0000e-004**	**0.0131**	**0.0000**	**41.2487**	**41.2487**	**1.2400e-003**	**0.0000**	**41.2797**

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	1.4648					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	**1.4808**	**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**

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	0.0217	0.0170	0.1702	4.6000e-004	0.0456	3.2000e-004	0.0459	0.0122	3.0000e-004	0.0125	0.0000	41.2487	41.2487	1.2400e-003	0.0000	41.2797
Total	**0.0217**	**0.0170**	**0.1702**	**4.6000e-004**	**0.0456**	**3.2000e-004**	**0.0459**	**0.0122**	**3.0000e-004**	**0.0125**	**0.0000**	**41.2487**	**41.2487**	**1.2400e-003**	**0.0000**	**41.2797**

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	9.5000e-003	0.0985	0.1026	1.6000e-004		5.2700e-003	5.2700e-003		4.8500e-003	4.8500e-003	0.0000	14.0198	14.0198	4.5300e-003	0.0000	14.1331
Paving	0.0259					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0354**	**0.0985**	**0.1026**	**1.6000e-004**		**5.2700e-003**	**5.2700e-003**		**4.8500e-003**	**4.8500e-003**	**0.0000**	**14.0198**	**14.0198**	**4.5300e-003**	**0.0000**	**14.1331**

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	5.2000e-004	4.1000e-004	4.0700e-003	1.0000e-005	1.1500e-003	1.0000e-005	1.1600e-003	3.1000e-004	1.0000e-005	3.1000e-004	0.0000	0.9868	0.9868	3.0000e-005	0.0000	0.9876
Total	**5.2000e-004**	**4.1000e-004**	**4.0700e-003**	**1.0000e-005**	**1.1500e-003**	**1.0000e-005**	**1.1600e-003**	**3.1000e-004**	**1.0000e-005**	**3.1000e-004**	**0.0000**	**0.9868**	**0.9868**	**3.0000e-005**	**0.0000**	**0.9876**

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	9.5000e-003	0.0985	0.1026	1.6000e-004		5.2700e-003	5.2700e-003		4.8500e-003	4.8500e-003	0.0000	14.0197	14.0197	4.5300e-003	0.0000	14.1331
Paving	0.0259					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0354**	**0.0985**	**0.1026**	**1.6000e-004**		**5.2700e-003**	**5.2700e-003**		**4.8500e-003**	**4.8500e-003**	**0.0000**	**14.0197**	**14.0197**	**4.5300e-003**	**0.0000**	**14.1331**

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	5.2000e-004	4.1000e-004	4.0700e-003	1.0000e-005	1.0900e-003	1.0000e-005	1.1000e-003	2.9000e-004	1.0000e-005	3.0000e-004	0.0000	0.9868	0.9868	3.0000e-005	0.0000	0.9876
Total	**5.2000e-004**	**4.1000e-004**	**4.0700e-003**	**1.0000e-005**	**1.0900e-003**	**1.0000e-005**	**1.1000e-003**	**2.9000e-004**	**1.0000e-005**	**3.0000e-004**	**0.0000**	**0.9868**	**0.9868**	**3.0000e-005**	**0.0000**	**0.9876**

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	1.3769	13.5321	16.0509	0.0556	3.8731	0.0882	3.9613	1.0572	0.0837	1.1409	0.0000	5,109.0598	5,109.0598	0.1948	0.0000	5,113.9303
Unmitigated	1.3769	13.5321	16.0509	0.0556	3.8731	0.0882	3.9613	1.0572	0.0837	1.1409	0.0000	5,109.0598	5,109.0598	0.1948	0.0000	5,113.9303

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	365.00	365.00	365.00	789,438	789,438
Unrefrigerated Warehouse-No Rail	2,118.55	2,118.55	2118.55	9,079,509	9,079,509
Total	2,483.55	2,483.55	2,483.55	9,868,947	9,868,947

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 Rail	16.60	8.40	6.90	59.00	0.00	41.00	92	5	3

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Parking Lot	0.546179	0.037976	0.179086	0.122965	0.018430	0.005460	0.017497	0.061396	0.001337	0.001657	0.006117	0.000817	0.001082
Regional Shopping Center	0.546179	0.037976	0.179086	0.122965	0.018430	0.005460	0.017497	0.061396	0.001337	0.001657	0.006117	0.000817	0.001082
Unrefrigerated Warehouse-No Rail	0.227299	0.037976	0.179086	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	386.6111	386.6111	0.0160	3.3000e-003	387.9942
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	386.6111	386.6111	0.0160	3.3000e-003	387.9942
NaturalGas Mitigated	3.0400e-003	0.0276	0.0232	1.7000e-004		2.1000e-003	2.1000e-003		2.1000e-003	2.1000e-003	0.0000	30.0894	30.0894	5.8000e-004	5.5000e-004	30.2682
NaturalGas Unmitigated	3.0400e-003	0.0276	0.0232	1.7000e-004		2.1000e-003	2.1000e-003		2.1000e-003	2.1000e-003	0.0000	30.0894	30.0894	5.8000e-004	5.5000e-004	30.2682

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	541655	2.9200e-003	0.0266	0.0223	1.6000e-004		2.0200e-003	2.0200e-003		2.0200e-003	2.0200e-003	0.0000	28.9048	28.9048	5.5000e-004	5.3000e-004	29.0765
Total		**3.0400e-003**	**0.0276**	**0.0232**	**1.7000e-004**		**2.1000e-003**	**2.1000e-003**		**2.1000e-003**	**2.1000e-003**	**0.0000**	**30.0894**	**30.0894**	**5.7000e-004**	**5.5000e-004**	**30.2683**

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	541655	2.9200e-003	0.0266	0.0223	1.6000e-004		2.0200e-003	2.0200e-003		2.0200e-003	2.0200e-003	0.0000	28.9048	28.9048	5.5000e-004	5.3000e-004	29.0765
Total		**3.0400e-003**	**0.0276**	**0.0232**	**1.7000e-004**		**2.1000e-003**	**2.1000e-003**		**2.1000e-003**	**2.1000e-003**	**0.0000**	**30.0894**	**30.0894**	**5.7000e-004**	**5.5000e-004**	**30.2683**

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	629707	200.6381	8.2800e-003	1.7100e-003	201.3559
Total		**386.6111**	**0.0160**	**3.2900e-003**	**387.9942**

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	629707	200.6381	8.2800e-003	1.7100e-003	201.3559
Total		**386.6111**	**0.0160**	**3.2900e-003**	**387.9942**

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	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	8.0000e-005	0.0000	0.0301
Unmitigated	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	8.0000e-005	0.0000	0.0301

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	0.1465					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	1.0848					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	1.3700e-003	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	8.0000e-005	0.0000	0.0301
Total	**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**	**8.0000e-005**	**0.0000**	**0.0301**

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	0.1465					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	1.0848					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	1.3700e-003	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	8.0000e-005	0.0000	0.0301
Total	**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**	**8.0000e-005**	**0.0000**	**0.0301**

7.0 Water Detail

7.1 Mitigation Measures Water

Install Low Flow Bathroom Faucet

Install Low Flow Kitchen Faucet

Install Low Flow Toilet

Install Low Flow Shower

Use Water Efficient Irrigation System

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	224.6060	1.6364	0.0402	277.5005
Unmitigated	280.4783	2.0455	0.0503	346.5954

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	61.7021 / 0	275.5631	2.0211	0.0497	340.8902
Total		**280.4783**	**2.0455**	**0.0503**	**346.5954**

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	0.59258 / 0.426299	4.1555	0.0195	4.9000e-004	4.7883
Unrefrigerated Warehouse-No	49.3617 / 0	220.4505	1.6169	0.0397	272.7122
Total		**224.6060**	**1.6364**	**0.0402**	**277.5005**

8.0 Waste Detail

8.1 Mitigation Measures Waste

Institute Recycling and Composting Services

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	26.5218	1.5674	0.0000	65.7066
Unmitigated	53.0436	3.1348	0.0000	131.4132

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	250.81	50.9122	3.0088	0.0000	126.1327
Total		**53.0436**	**3.1348**	**0.0000**	**131.4132**

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	5.25	1.0657	0.0630	0.0000	2.6402
Unrefrigerated Warehouse-No Rail	125.405	25.4561	1.5044	0.0000	63.0664
Total		**26.5218**	**1.5674**	**0.0000**	**65.7066**

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
Forklifts	12	8.00	260	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	0.2247	2.0241	1.8412	2.3800e-003		0.1508	0.1508		0.1387	0.1387	0.0000	209.4944	209.4944	0.0678	0.0000	211.1883
Total	**0.2247**	**2.0241**	**1.8412**	**2.3800e-003**		**0.1508**	**0.1508**		**0.1387**	**0.1387**	**0.0000**	**209.4944**	**209.4944**	**0.0678**	**0.0000**	**211.1883**

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

III Mitigation Monitoring and Reporting Program

Underline-strikeout shows updates to mitigation measures/project design features incorporated in response to comments

Mitigation Measure	Implementation Timing	Responsible Monitoring Party	Monitoring/ Reporting Method	Monitoring Compliance Record (Name/Date)
Air Quality				
MM AQ-1: Prior to the issuance of grading permits, the City Engineer shall confirm that the Grading Plan, Building Plans and Specifications require all construction contractors to comply with South Coast Air Quality Management District's (SCAQMD's) Rules 402 and 403 to minimize construction emissions of dust and particulates. The measures include, but are not limited to, the following: ▪ Portions of a construction site to remain inactive longer than a period of three months will be seeded and watered until grass cover is grown or otherwise stabilized. ▪ All on-site roads will be paved as soon as feasible or watered periodically or chemically stabilized. ▪ All material transported off site will be either sufficiently watered or securely covered to prevent excessive amounts of dust. ▪ The area disturbed by clearing, grading, earthmoving, or excavation operations will be minimized at all times. ▪ Where vehicles leave a construction site and enter adjacent public streets, the streets will be swept daily or washed down at the end of the work day to remove soil tracked onto the paved surface.	Prior to the issuance of grading permits	City of Upland Public Works Department, City Engineer	Shown on grading plan, building plans and specifications	Initials: _____ Date: _____
MM AQ-2: The applicant shall require by contract specifications that the interior and exterior architectural coatings (paint and primer including parking lot paint) products used would have a volatile organic compound rating of 50 grams per liter or less. Contract specifications shall be included in the construction documents for the Project, which shall be	Prior to the issuance of building permits	City of Upland Building and Safety Division	Contract specifications included in the construction documents for the Project to identify materials and paints to be used on the building plans	Initials: _____ Date: _____

Mitigation Measure	Implementation Timing	Responsible Monitoring Party	Monitoring/ Reporting Method	Monitoring Compliance Record (Name/Date)
reviewed and approved by the City of Upland Building Department prior to the issuance of building permits.				
MM AQ-3: 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~~. (Now replaced with PDF-GHG-2 and PDF-GHG-3) ▪ ~~At least 6% of all vehicle parking spaces (including for trucks) shall be designed to accommodate future electric vehicle charging stations.~~ (Now replaced with PDF-GHG-2 and PDF-GHG-3.) 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. ▪ Legible, durable, weatherproof signs shall be placed at truck access gates, loading docks, and truck parking areas that identify applicable California Air Resources Board (CARB) anti-idling regulations. At a minimum, each sign shall include (1) instructions for truck drivers to shut off engines when not in use; (2) instructions for drivers of diesel trucks to restrict idling to no more than 5 minutes; and (3) telephone numbers of the building facilities manager and CARB to report violations. ▪ All service equipment (e.g., forklifts, yard trucks, hostlers, etc.) used within the site shall be electric ~~or powered by compressed natural gas~~.	Prior to the issuance of a certificate of occupancy	City of Upland Planning Division	Compliance with project conditions of approval	Initials: _____ Date: _____

Mitigation Measure	Implementation Timing	Responsible Monitoring Party	Monitoring/ Reporting Method	Monitoring Compliance Record (Name/Date)
▪ 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 SmartWay program.				
PDF-AQ-1: Off-road diesel-powered construction equipment greater than 50 horsepower shall meet USEPA Tier 4 off-road emission standards. This requirement shall be included in applicable contractor contracts, and 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.	Prior to the issuance of grading permits	City of Upland Public Works Department	Referenced as a note on grading plans and building plans; site inspection	Initials: _____ Date: _____
PDF-AQ-2: 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.	Prior to the issuance of grading permits	City of Upland Public Works Department	Referenced as a note on grading plans and building plans; site inspection	Initials: _____ Date: _____

Mitigation Measure	Implementation Timing	Responsible Monitoring Party	Monitoring/ Reporting Method	Monitoring Compliance Record (Name/Date)
Biological Resources				
MM BIO-1, Nesting Bird Pre-Construction Survey: Vegetation clearing and ground disturbing activities should be conducted outside of the nesting season ~~(January 15 to August 31)~~ (February 1 to September 30th). If these activities occur during nesting season, then a qualified biologist will conduct a nesting bird survey within three days prior to any disturbance of the site, including tree and shrub removal, disking, demolition activities, and grading. If active nests are identified, the biologist shall establish suitable buffers around the nests depending on the level of activity within the buffer and species detected, and the buffer areas shall be avoided until the nests are no longer occupied and the juvenile birds can survive independently from the nests. Raptor species will have an avoidance buffer of 500 feet and other bird species will have an avoidance buffer of 300 feet. These buffers may be reduced in consultation with the CDFW. If active nests are not identified, vegetation clearing and ground disturbing activities may be commenced.	Grading permits shall be conditioned on submittal of written proof of compliance prior to applicant undertaking site disturbance (including but not limited to permits allowing discing, demolition and clearing/grubbing activities).	City of Upland Planning Division	Pre-Construction Survey Report shall be submitted to the City	Initials: _____ Date: _____
MM BIO-2, Burrowing Owls: Prior to the initiation of construction activities, a qualified biologist shall conduct two preconstruction (take avoidance) surveys for burrowing owl: one survey 14 days prior to initiating ground disturbance and one within 24 hours prior to ground disturbance. These survey shall be conducted in accordance with the most current and applicable California Department of Fish and Wildlife (CDFW) protocol (current protocol is 2012 Staff Report on Burrowing Owl Mitigation) to determine whether the burrowing owl is present at the site. Preconstruction surveys shall include suitable burrowing owl habitat within the Project footprint and within 500 feet of the Project footprint (or within an appropriate buffer as required in	Grading permits shall be conditioned on submittal of written proof of compliance prior to applicant undertaking site disturbance (including but not limited to discing, demolition and clearing/grubbing activities).	City of Upland Planning Division	Pre-Construction Survey Report shall be submitted to the City	Initials: _____ Date: _____

Mitigation Measure	Implementation Timing	Responsible Monitoring Party	Monitoring/ Reporting Method	Monitoring Compliance Record (Name/Date)
the most recent guidelines and where legal access to conduct the survey exists). If burrowing owls are not detected during the clearance survey, no additional mitigation is required. 1. If burrowing owl is located, occupied burrowing owl burrows shall not be disturbed during the nesting season (February 1 through August 31) unless a qualified biologist verifies through non-invasive methods that either the birds have not begun egg-laying and incubation or that juveniles from the occurred burrows are foraging independently and capable of independent survival. A 500-foot non-disturbance buffer (where no work activities may be conducted) will be maintained between Project activities and nesting burrowing owls during the nesting season, unless otherwise authorized by CDFW. 2. If burrowing owl is detected during the non-breeding season (September 1 through January 31) or confirmed to not be nesting, a 160-foot buffer non-disturbance buffer will be maintained between the Project activities and occupied burrow. Alternatively, a Burrowing Owl Relocation and Mitigation Plan may be prepared and submitted for approval by CDFW. Once approved, the Plan would be implemented to relocate non-breeding burrowing owls from the Project site. The Plan will detail methods and guidance for passive relocation of burrowing owls from the Project site, provide monitoring and management of the replacement burrow sites, reporting requirements, and ensure that a minimum of two suitable, unoccupied burrows are available off site for every burrowing owl or pair of burrowing owls to be passively relocated. Compensatory mitigation of habitat would be required if occupied burrows or territories occur within the permanent impact footprint. Ratios typically include a minimum of 19.5 acres per nesting burrow lost;				

Mitigation Measure	Implementation Timing	Responsible Monitoring Party	Monitoring/ Reporting Method	Monitoring Compliance Record (Name/Date)
however, habitat compensation will be approved by CDFW and detailed in the Burrowing Owl Relocation and Mitigation Plan. Suitable burrowing owl habitat conserved pursuant to the Settlement Agreement may be counted toward mitigation for impacts to burrowing owl habitat and would be based upon regulatory agency approval. 3. Construction work may proceed after owls have been excluded from the site following accepted protocol and approval of CDFW, and as approved by the City.				
MM BIO-3, Scale Broom Scrub: Prior to the issuance of certificate of occupancy, the project applicant shall submit to the satisfaction of the City Planning Division, evidence that scale broom scrub habitat with equal or better habitat value as the site's habitat has been preserved at a 0.5:1 mitigation (new:existing) ratio at a suitable location where the long-term viability of the habitat can be assured. Satisfactory evidence includes, but is not limited to, evidence that the appropriate amount has been purchased at an approved mitigation bank.	Prior to the issuance of certificate of occupancy	City of Upland Planning Division	Written evidence of completion of and compliance with requirements	Initials: _____ Date: _____
Cultural Resources				
MM CR-1, Retain a Native American Monitor/Consultant: The Project Applicant shall retain and compensate for the services of a Tribal monitor/consultant who is both approved by the Gabrieleño Band of Mission Indians-Kizh Nation Tribal Government and is listed under the NAHC's Tribal Contact list for the area of the project location. This list is provided by the NAHC. The monitor/consultant would only be present on-site during the construction phases that involve ground disturbing activities. Ground disturbing activities are defined by the Gabrieleño Band of Mission Indians-Kizh Nation as activities that may include, but are not limited to, pavement removal, pot-holing or auguring, grubbing, tree removals, boring, grading,	Prior to the issuance of grading permits	City of Upland Planning Division	Written evidence of retention of Tribal monitor/consultant	Initials: _____ Date: _____

Mitigation Measure	Implementation Timing	Responsible Monitoring Party	Monitoring/ Reporting Method	Monitoring Compliance Record (Name/Date)
excavation, drilling, and trenching, within the Project area. The Tribal monitor/consultant will complete daily monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when the Project site grading and excavation activities are completed, or when the Tribal Representatives and monitor/consultant have indicated that the site has a low potential for impacting Tribal Cultural Resources.				
MM CR-2, Unanticipated Discovery of Tribal Cultural and Archaeological Resources: Upon discovery of any archaeological resources, cease construction activities in the immediate vicinity of the find until the find can be assessed. All archaeological resources unearthed by project construction activities shall be evaluated by the qualified archaeologist and Tribal monitor/consultant approved by the Gabrieleño Band of Mission Indians-Kizh Nation. If the resources are Native American in origin, the Gabrieleño Band of Mission Indians-Kizh Nation shall coordinate with the San Manuel Band of Mission Indians (SMBMI), per Mitigation Measure CR-3, and the landowner regarding treatment and curation of these resources. Typically, the Gabrieleño Band of Mission Indians-Kizh Nation will request reburial or preservation for educational purposes. Work may continue on other parts of the project while evaluation and, if necessary, mitigation takes place (CEQA Guidelines Section15064.5 [f]). If a resource is determined by the qualified archaeologist to constitute a "historical resource" or "unique archaeological resource", time allotment and funding sufficient to allow for implementation of avoidance measures, or appropriate mitigation, must be available. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources	Upon discovery (if applicable)	City of Upland Planning Division	Preparation and compliance with applicable mitigation plan to protect the significant cultural resource in question (if applicable)	Initials: _____ Date: _____

Mitigation Measure	Implementation Timing	Responsible Monitoring Party	Monitoring/ Reporting Method	Monitoring Compliance Record (Name/Date)
Code Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be offered to a local school or historical society in the area for educational purposes.				
MM CR-3, Monitoring and Treatment Plan: If significant pre-contact cultural resources, as defined by CEQA (as amended, 2019), are discovered and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan, in coordination with San SMBMI and the Gabrieleño Band of Mission Indians-Kizh Nation (Tribes) per Mitigation measure CR-2, and all subsequent finds shall be subject to this Plan. This Plan shall allow for a monitor to be present that represents SMBMI for the remainder of the project, should SMBMI elect to place a monitor on-site.	Upon discovery (if applicable)	City of Upland Planning Division	Preparation and compliance with applicable mitigation plan to protect the significant cultural resource in question (if applicable)	Initials: _____ Date: _____
MM CR-4, Unanticipated Discovery of Human Remains and Associated Funerary Objects: Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in PRC 5097.98, are also to be treated according to this statute. Health and Safety Code 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the	Upon discovery (if applicable)	City of Upland Planning Division	Compliance with Health and Safety Code 7050.5 (if applicable)	Initials: _____ Date: _____

Mitigation Measure	Implementation Timing	Responsible Monitoring Party	Monitoring/ Reporting Method	Monitoring Compliance Record (Name/Date)
County Coroner and excavation halted until the Coroner has determined the nature of the remains. If the Coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission (NAHC) and PRC 5097.98 shall be followed.				
MM CR-5, Resource Assessment & Continuation of Work Protocol: Upon discovery, the tribal and/or archaeological monitor/consultant/consultant will immediately divert work at minimum of 150 feet and place an exclusion zone around the burial. The monitor/consultant(s) will then notify the Tribes, the qualified lead archaeologist, and the construction manager who will call the Coroner. Work will continue to be diverted while the Coroner determines whether the remains are Native American. The discovery is to be kept confidential and secure to prevent any further disturbance. If the finds are determined to be Native American, the coroner will notify the NAHC as mandated by state law who will then appoint a Most Likely Descendent (MLD). If the Gabrieleno Band of Mission Indians – Kizh Nation is designated MLD, the following treatment measures shall be implemented. To the Tribe, the term "human remains" encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the burial of funerary objects with the deceased, and the ceremonial burning of human remains. These remains are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain	Upon discovery (if applicable)	City of Upland Planning Division	Preparation and compliance with applicable mitigation plan to protect the significant cultural resource in question (if applicable)	Initials: _____ Date: _____

Mitigation Measure	Implementation Timing	Responsible Monitoring Party	Monitoring/ Reporting Method	Monitoring Compliance Record (Name/Date)
human remains can also be considered as associated funerary objects.				
MM CR-6, Treatment Measures: Prior to the continuation of ground disturbing activities, the land owner shall arrange a designated site location within the footprint of the Project for the respectful reburial of the human remains and/or ceremonial objects. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The Tribes will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the Project cannot be diverted, it may be determined that burials will be removed. The Tribes will work closely with the qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Tribes, documentation shall be taken which includes at a minimum detailed descriptive notes and sketches. Additional types of documentation shall be approved by the Tribes for data recovery purposes. Cremations will either be removed in bulk or by means as necessary to ensure completely recovery of all material. If the discovery of human remains includes four or more burials, the location is considered a cemetery and a separate treatment plan shall be created. Once complete, a final report of all activities is to be submitted to the Tribes and the NAHC. The Tribes do NOT authorize any scientific study or the utilization of any invasive diagnostics on human remains.	Prior to the continuation of ground disturbing activities (if applicable)	City of Upland Planning Division	Preparation and compliance with applicable mitigation plan to protect the significant cultural resource in question (if applicable)	Initials: _____ Date: _____
MM CR-7, Archaeological/Cultural Reports:	Upon completion of any archaeological/cultural	City of Upland Planning Division	Preparation and compliance with	Initials: _____ Date: _____

Mitigation Measure	Implementation Timing	Responsible Monitoring Party	Monitoring/ Reporting Method	Monitoring Compliance Record (Name/Date)
Any and all archaeological/cultural documents created as a part of the Project (isolate records, site records, survey reports, testing reports, etc.) shall be supplied to the Project Applicant and City for dissemination to the Tribes. The City and/or Project Applicant shall, in good faith, consult with Tribes throughout the life of the Project.	documents created as a part of the Project (if applicable)		applicable mitigation plan to protect the significant cultural resource in question that would initiate any such reports (if applicable)	
Geology and Soils				
MM GEO-1: Prior to issuance of a grading permit, the developer shall, to the satisfaction of the City Public Works Director, show that precise grading plan(s) include(s) all recommendations contained in the geotechnical investigation report prepared for the proposed Project. The performance standard for this measure is to assure that all recommended grading and structures for the project conform to City standards.	Prior to issuance of a grading permit	City of Upland Public Works Director	Inclusion on grading plans	Initials: _____ Date: _____
MM GEO-2: Prior to the issuance of any grading permits, or any permit authorizing ground disturbance, the Project applicant shall, to the satisfaction of the City Planning Division, demonstrate that a qualified paleontological monitor has been retained to be present during excavation or any mass grading activities. In the event that fossils or fossil-bearing deposits are discovered during construction, the paleontological monitor shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation and, if necessary, salvage. An appropriate buffer area shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. excavations within 50 feet of the find shall be temporarily halted or diverted. The paleontologist shall document the discovery as needed in accordance with Society of Vertebrate Paleontology	Prior to the issuance of any grading permits, or any permit authorizing ground disturbance	City of Upland Planning Division	Written evidence of retention of paleontological monitor/consultant	Initials: _____ Date: _____

Mitigation Measure	Implementation Timing	Responsible Monitoring Party	Monitoring/ Reporting Method	Monitoring Compliance Record (Name/Date)
standards, evaluate the potential resource, and assess the significance of the find under the criteria set forth in CEQA Guidelines Section 15064.5. The paleontologist shall notify the appropriate agencies to determine procedures that would be followed before construction is allowed to resume at the location of the find. If in consultation with the paleontologist, City staff and the project applicant determine that avoidance is not feasible, the paleontologist shall prepare an excavation plan for reducing the effect of the project on the qualities that make the resource important. The plan shall be submitted to the City for review and approval and the project applicant shall implement the approval plan.				
Greenhouse Gas Emissions				
PDF-GHG-1: The Project shall install 0.75 MW of rooftop solar; this equates to approximately 55,000 square feet of roof space however the total square footage may vary provided that 0.75 MW of power is achieved.	Prior to the issuance of certificate of occupancy	City of Upland Building and Safety Division	Incorporation of requirement into building plans	Initials: _____ Date: _____
PDF-GHG-2: The Project shall provide charging stations to service 30 parking spaces.	Prior to the issuance of certificate of occupancy	City of Upland Building and Safety Division	Incorporation of requirement into building plans	Initials: _____ Date: _____
PDF-GHG-3: The Project shall provide the following EV-ready spaces, i.e. install, at a minimum, conduits for future plug-in of EV chargers; providing EV-ready spaces allows installation of the latest technology chargers at the time that electric delivery vans and trucks become operational, rather than installing charging stations immediately that become obsolete at the time that electric vans and trucks become used: ▪ 50% of auto stalls, including 100% of ADA stalls	Prior to the issuance of certificate of occupancy	City of Upland Building and Safety Division	Incorporation of requirement into building plans	Initials: _____ Date: _____

Mitigation Measure	Implementation Timing	Responsible Monitoring Party	Monitoring/ Reporting Method	Monitoring Compliance Record (Name/Date)
▪ 100% of van parking stalls ▪ 100% of trailer parking stalls ▪ 100% of dock doors ▪ 100% of van positions at van loading areas at north and south sides of the building				
PDF-GHG-4: The Project shall include 1,000 trees throughout the parking lot and landscaped areas around the Project site.	Prior to the issuance of building permits	City of Upland Building and Safety Division	Incorporation of requirement into landscape plans	Initials: _____ Date: _____
PDF-GHG-5: The Project shall use all electric powered forklifts.	Ongoing during operations	City of Upland Building and Safety Division	Condition of approval, to be implemented by tenant	Initials: _____ Date: _____
PDF-GHG-6: Electric landscaping equipment, such as lawn mowers and leaf blowers, shall be used on-site.	Ongoing during operations	City of Upland Planning Division	Condition of approval, to be implemented by tenant	Initials: _____ Date: _____
Noise				
PDF-NOI-1: A construction management plan shall be implemented prior to Grading Permit issuance which shall contain the following elements: ▪ Construction contracts shall specify that all construction equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers and other state required noise attenuation devices. ▪ Property owners and occupants located within 150 feet of the Project boundary shall be sent a notice, at least 15 days prior to commencement of construction of each phase, regarding the construction schedule of the proposed Project. A sign, legible at a distance of 50 feet shall also be posted at the Project construction site.	Prior to the issuance of grading permits; ongoing during construction	City of Upland Public Works Department	Referenced as a note on grading plans and building plans; site inspection	Initials: _____ Date: _____

Mitigation Measure	Implementation Timing	Responsible Monitoring Party	Monitoring/ Reporting Method	Monitoring Compliance Record (Name/Date)
▪ All notices and signs shall be reviewed and approved by the City of Upland Development Services Department, prior to mailing or posting and shall indicate the ▪ dates and duration of construction activities, as well as provide a contact name and a telephone number where residents can inquire about the construction process and register complaints. ▪ Construction noise reduction methods shall include shutting off idling equipment, installing temporary acoustic barriers around stationary construction noise sources, maximizing the distance between construction equipment staging areas and occupied residential areas, and electric air compressors and similar power tools. ▪ Construction haul routes shall be designed to avoid noise sensitive uses (e.g., residences, convalescent homes, etc.), to the extent feasible. ▪ During construction, stationary construction equipment shall be placed such that emitted noise is directed away from sensitive noise receivers. ~~▪ Construction activities shall not take place outside of the allowable hours specified by the City's Municipal Code Chapter 9.40.100(M) (allowable construction hours are between 7:00 a.m. and 6:00 p.m. on weekdays).~~ ▪ Construction activities shall take place consistent with the City's *Municipal Code Chapter 9.40.100(M)*.				
Transportation				
MM TRAF-1, 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	Prior to the issuance of a Final Certificate of Occupancy for the Tenant	City of Upland Planning Division	Written documentation providing compliance with MM TRAF-1.	Initials: _____ Date: _____

Mitigation Measure	Implementation Timing	Responsible Monitoring Party	Monitoring/ Reporting Method	Monitoring Compliance Record (Name/Date)
exist on the west leg of the intersection. Therefore, this improvement can be achieved by striping and signal head modifications. The Project will contribute on a fair-share basis to this improvement.				