

February 4, 2016

Mr. Jim Kozak  
LANSING COMPANIES  
12671 High Bluff Drive, Suite 150  
San Diego, CA 92130

**Subject: Agua Mansa Warehouse Air Quality and Greenhouse Gas (GHG) Impact Study Addendum Letter and Response to Comments, County of San Bernardino**

Dear Mr. Kozak:

RK Engineering Group, Inc. (RK) has previously completed the Agua Mansa High Cube Warehouse Air Quality and Greenhouse Gas Impact Study (AQ/GHG Study) (August 2014). This addendum letter is intended to address a few additional comments made by the County of San Bernardino Land Use Services Department regarding the report.

Comment 1: The AQ/GHG Study indicates different land use and trip generation assumptions than the traffic impact study.

Response 1: The Revised Agua Mansa High Cube Warehouse Traffic Impact Study, prepared by RK, was updated in July 2015 in response to comments received by the County of San Bernardino Department of Public Works Traffic Division. As part of the update, it was requested that the land use and trip generation of the smaller building (Building B) be considered a light industrial use instead of a high-cube warehouse use. The change in land use resulted in a trip generation increase of only 141 average daily trips (ADT). No new impacts were found as a result of the change in land use and the increase is considered insignificant.

The nominal change in land use and trip generation is not expected to significantly change the results of the AQ/GHG analysis. No additional impacts or mitigation are expected and the project will still be required to comply with the County's GHG Emissions Reduction Plan. No additional changes to the report have been made at this time. Please see Comment 2 for additional discussion regarding the mitigation measures and the GHG Emission Reduction Plan

Comment 2: The project shall comply with the emission reduction measures from the County's Greenhouse Gas Emission Reduction Plan (GHG Plan).

Response 2: The results of the AQ/GHG Study show that the project is expected to exceed the County's threshold of 3,000 metric tons of carbon dioxide equivalents (MTCO<sub>2</sub>e) per year, thus requiring mitigation. The County's GHG Plan uses Screening Tables to assist with calculating GHG reduction measures. Projects that garner 100 points or greater would be consistent with the GHG Plan, and will therefore have a less than significant impact, consistent with CEQA Guidelines. The project is required to complete the Screening Table for Implementation of GHG Reduction Measures for Commercial Development.

Please see Attachment A for the completed Screening Table assessment. The project will provide features that amount to 111 points, thus meeting the 100 point requirement for GHG reductions.

This addendum letter, with attachments, is intended to serve as a supplement to the AQ/GHG Study. No additional changes to the report have been made at this time, and the AQ/GHG analysis is considered to be an adequate assessment of project impacts. With the measures described herein, the project would have a less than significant impact in regard to GHG emissions.

RK appreciates this opportunity to work with LANSING COMPANIES on this project. If you have any questions or would like further review, please do not hesitate to contact us at (949) 474-0809.

Sincerely,  
RK ENGINEERING GROUP, INC.



Robert Kahn, P.E.  
Principal



Bryan Estrada, PTP  
Senior Transportation Planner

Attachments:

## **Attachment A**

Screening Table for Implementation of GHG Reduction Measures for  
Commercial Development

**Table 2: Screening Table for Implementation of GHG Reduction Measures for Commercial Development**

Feature	Description	Assigned Point Values	Project Points
<b>Reduction Measure R2E7: Energy Efficiency for Commercial Development</b>			
<b>Building Envelope</b>			
Insulation	Title 24 standard (required)	0 points	12
	Modestly Enhanced Insulation (5% > Title 24)	4 points	
	Enhanced Insulation (15%> Title 24)	8 points	
	Greatly Enhanced Insulation (20%> Title 24)	12 points	
Windows	Title 24 standard (required)	0 points	8
	Modestly Enhanced Window Insulation (5% > Title 24)	4 points	
	Enhanced Window Insulation (15%> Title 24)	8 points	
	Greatly Enhanced Window Insulation (20%> Title 24)	12 points	
Doors	Title 24 standard (required)	0 points	0
	Modestly Enhanced Insulation (5% > Title 24)	4 points	
	Enhanced Insulation (15%> Title 24)	8 points	
	Greatly Enhanced Insulation (20%> Title 24)	12 points	
Air Infiltration	Minimizing leaks in the building envelope is as important as the insulation properties of the building. Insulation does not work effectively if there is excess air leakage.		8
	Title 24 standard (required)	0 points	
	Modest Building Envelope Leakage (5% > Title 24)	4 points	
	Reduced Building Envelope Leakage (15%> Title 24)	8 points	
Thermal Storage of Building	Minimum Building Envelope Leakage (20% > Title 24)	12 points	0
	Thermal storage is a design characteristic that helps keep a constant temperature in the building. Common thermal storage devices include strategically placed water filled columns, water storage tanks, and thick masonry walls.		
	Thermal storage designed to reduce heating/cooling by 5°F within the building	6 points	
	Thermal storage to reduce heating/cooling by 10°F within the building	12 points	
	Note: Engineering details must be provided to substantiate the efficiency of the thermal storage device.		

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Feature	Description	Assigned Point Values	Project Points
<b>Indoor Space Efficiencies</b>			
Heating/ Cooling Distribution System	Title 24 standard (required)	0 points	8
	Modest Distribution Losses (5% > Title 24)	4 points	
	Reduced Distribution Losses (15%> Title 24)	8 points	
	Greatly Reduced Distribution Losses (15%> Title 24)	12 points	
Space Heating/ Cooling Equipment	Title 24 standard (required)	0 points	8
	Efficiency HVAC (5% > Title 24)	4 points	
	High Efficiency HBAC (15%> Title 24)	8 points	
	Very High Efficiency HBAC (20%> Title 24)	12 points	
<b>Building Envelope</b>			
Commercial Heat Recovery Systems	Heat recovery strategies employed with commercial laundry, cooking equipment, and other commercial heat sources for reuse in HVAC air intake or other appropriate heat recovery technology. Point values for these types of systems will be determined based upon design and engineering data documenting the energy savings.	TBD	
Water Heaters	Title 24 standard (required)	0 points	12
	Efficiency Water Heater (Energy Star conventional that is 5% > Title 24)	4 points	
	High Efficiency Water Heater (Conventional water heater that is 15%> Title 24)	8 points	
	High Efficiency Water Heater (Conventional water heater that is 20%> Title 24)	12 points	
	Solar Water Heating System (commercial only-this reduction feature also implements R2E10)	14 points	
Daylighting	Daylighting is the ability of each room within the building to provide outside light during the day reducing the need for artificial lighting during daylight hours.		1
	All peripheral rooms within building have at least one window or skylight	1 points	
	All rooms within building have daylight (through use of windows, solar tubes, skylights, etc.) such that each room has at least 800 lumens of light during a sunny day	5 points	
	All rooms daylighted to at least 1,000 lumens	7 points	
Artificial Lighting	Title 24 standard (required)	0 points	8
	Efficient Lights (5% > Title 24)	4 points	
	High Efficiency Lights (LED, etc. 15%> Title 24)	6 points	
	Very High Efficiency Lights (LED, etc. 20%> Title 24)	8 points	

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Feature	Description	Assigned Point Values	Project Points
Appliances	Title 24 standard (required)	0 points	8
	Efficient Appliances (5% > Title 24)	4 points	
	High Efficiency Energy Star Appliances (15%> Title 24)	8 points	
	Very High Efficiency Appliances (20%> Title 24)	12 points	
<b>Miscellaneous Commercial Building Efficiencies</b>			
Building Placement	North/South alignment of building or other building placement such that the orientation of the buildings optimizes conditions for natural heating, cooling, and lighting.	4 point	4
Other	This allows innovation by the applicant to provide design features that increases the energy efficiency of the project not provided in the table. Note that engineering data will be required documenting the energy efficiency of innovative designs and point values given based upon the proven efficiency beyond Title 24 Energy Efficiency Standards.	TBD	
Existing Commercial building Retrofits	<p>The applicant may wish to provide energy efficiency retrofit projects to existing residential dwelling units to further the point value of their project. Retrofitting existing commercial buildings within the unincorporated County is a key reduction measure that is needed to reach the reduction goal. The potential for an applicant to take advantage of this program will be decided on a case by case basis and must have the approval of the San Bernardino County Land Use Services Department. The decision to allow applicants to ability to participate in this program will be evaluated based upon, but not limited to the following:</p> <p>Will the energy efficiency retrofit project benefit low income or disadvantaged communities?</p> <p>Does the energy efficiency retrofit project fit within the overall assumptions in Reduction Measure R2E4?</p> <p>Does the energy efficiency retrofit project provide co-benefits important to the County?</p> <p>Point value will be determined based upon engineering and design criteria of the energy efficiency retrofit project.</p>	TBD	

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Feature	Description	Assigned Point Values	Project Points
<b>Reduction Measure R2E9 and R2E10: New Commercial/Industrial Renewable Energy</b>			
Photovoltaic	<p>Solar Photovoltaic panels installed on commercial buildings or in collective arrangements within a commercial development such that the total power provided augments:</p> <p>Solar Ready Roofs (sturdy roof and electric hookups)</p> <p>10 percent of the power needs of the project</p> <p>20 percent of the power needs of the project</p> <p>30 percent of the power needs of the project</p> <p>40 percent of the power needs of the project</p> <p>50 percent of the power needs of the project</p> <p>60 percent of the power needs of the project</p> <p>70 percent of the power needs of the project</p> <p>80 percent of the power needs of the project</p> <p>90 percent of the power needs of the project</p> <p>100 percent of the power needs of the project</p>	<p>2 points</p> <p>7 points</p> <p>13 points</p> <p>19 points</p> <p>25 points</p> <p>31 points</p> <p>37 points</p> <p>43 points</p> <p>49 points</p> <p>55 points</p> <p>60 points</p>	
Wind turbines	<p>Some areas of the County lend themselves to wind turbine applications. Analysis of the areas capability to support wind turbines should be evaluated prior to choosing this feature. Wind turbines as part of the commercial development such that the total power provided augments:</p> <p>10 percent of the power needs of the project</p> <p>20 percent of the power needs of the project</p> <p>30 percent of the power needs of the project</p> <p>40 percent of the power needs of the project</p> <p>50 percent of the power needs of the project</p> <p>60 percent of the power needs of the project</p> <p>70 percent of the power needs of the project</p> <p>80 percent of the power needs of the project</p> <p>90 percent of the power needs of the project</p> <p>100 percent of the power needs of the project</p>	<p>7 points</p> <p>13 points</p> <p>19 points</p> <p>25 points</p> <p>31 points</p> <p>37 points</p> <p>43 points</p> <p>49 points</p> <p>55 points</p> <p>60 points</p>	
Off-site renewable energy project	<p>The applicant may submit a proposal to supply an off-site renewable energy project such as renewable energy retrofits of existing residential that will help implement R2E1, existing commercial/industrial that will help implement R2E2, or the Warehouse Renewable Energy Incentive Program (R2E4). These off-site renewable energy retrofit project proposals will be determined on a case by case basis accompanied by a detailed plan documenting the quantity of renewable energy the proposal will generate. Point values will be based upon the energy generated by the proposal.</p>	TBD	

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Feature	Description	Assigned Point Values	Project Points
Other Renewable Energy Generation	The applicant may have innovative designs or unique site circumstances (such as geothermal) that allow the project to generate electricity from renewable energy not provided in the table. The ability to supply other renewable energy and the point values allowed will be decided based upon engineering data documenting the ability to generate electricity.	TBD	
<b>Reduction Measure R2E7: Warehouse Renewable Energy Incentive Program</b>			
Warehouse Photovoltaic	<p>This measure is for warehouse projects and involves partnership with Sothern California Edison and California Public Utilities Commissions to develop an incentive program for solar installation on new and retrofit existing warehouses. A mandatory minimum solar requirement for new warehouse space. Solar Photovoltaic panels installed on warehouses or in collective arrangements within a logistics/warehouse complex such that the total power provided augments:</p> <p>Solar Ready Roof (sturdy roof and electric hookups)</p> <p>10 percent of the power needs of the project</p> <p>20 percent of the power needs of the project</p> <p>30 percent of the power needs of the project</p> <p>40 percent of the power needs of the project</p> <p>50 percent of the power needs of the project</p> <p>60 percent of the power needs of the project</p> <p>70 percent of the power needs of the project</p> <p>80 percent of the power needs of the project</p> <p>90 percent of the power needs of the project</p> <p>100 percent of the power needs of the project</p>	<p>2 points</p> <p>4 points</p> <p>5 points</p> <p>7 points</p> <p>9 points</p> <p>11 points</p> <p>13 points</p> <p>15 points</p> <p>17 points</p> <p>19 points</p> <p>21 points</p>	
<b>Reduction Measure R2WC-1: Per Capita Water Use Reduction Goal</b>			
<b>Irrigation and Landscaping</b>			
Water Efficient Landscaping	<p>Limit conventional turf to &lt; 20% of each lot (required)</p> <p>Eliminate conventional turf from landscaping</p> <p>Eliminate turf and only provide drought tolerant plants</p> <p>Xeroscaping that requires no irrigation</p>	<p>0 points</p> <p>3 points</p> <p>4 points</p> <p>6 points</p>	4
Water Efficient irrigation systems	<p>Drip irrigation</p> <p>Smart irrigation control systems combined with drip irrigation (demonstrate 20 reduced water use)</p>	<p>1 point</p> <p>5 points</p>	5
Recycled Water	Graywater (purple pipe) irrigation system on site	5 points	



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Feature	Description	Assigned Point Values	Project Points
Storm water Reuse Systems	Innovative on-site stormwater collection, filtration and reuse systems are being developed that provide supplemental irrigation water and provide vector control. These systems can greatly reduce the irrigation needs of a project. Point values for these types of systems will be determined based upon design and engineering data documenting the water savings.	TBD	
<b>Potable Water</b>			
Showers	Title 24 standard (required) EPA High Efficiency Showerheads (15% > Title 24)	0 points 3 points	0
Toilets	Title 24 standard (required) EPA High Efficiency Toilets/Urinals (15% > Title 24) Waterless Urinals (note that commercial buildings having both waterless urinals and high efficiency toilets will have a combined point value of 6 points)	0 points 3 points 3 points	3
Faucets	Title 24 standard (required) EPA High Efficiency faucets (15% > Title 24)	0 points 3 points	3
Commercial Dishwashers	Title 24 standard (required) EPA High Efficiency dishwashers (20% water savings)	0 points 4 points	0
Commercial Laundry Washers	Title 24 standard (required) EPA High Efficiency laundry (15% water savings) EPA High Efficiency laundry Equipment that captures and reuses rinse water (30% water savings)	0 points 3 points 6 points	0
Commercial Water Operations Program	Establish an operational program to reduce water loss from pools, water features, etc., by covering pools, adjusting fountain operational hours, and using water treatment to reduce draw down and replacement of water. Point values for these types of plans will be determined based upon design and engineering data documenting the water savings.	TBD	
<b>Reduction Measure R2T1: Anti-Idling Enforcement</b>			
Commercial Vehicle Idling Restrictions	All commercial vehicles are restricted to 5-minutes or less per trip on site and at loading docks (required of all commercial projects)	1 point	1

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Feature	Description	Assigned Point Values	Project Points
<b>Reduction Measure R2T2: Employment Based Trip and VMT Reduction Policy</b>			
Compressed Work Week	Reduce the number of days per week that employees need to be on site will reduce the number of vehicle trips associated with commercial/industrial development. Compressed work week such that full time employees are on site:		
	5 days per week	0 points	0
	4 days per week on site	4 points	
	3 days per week on site	8 points	
Car/Vanpools	Car/vanpool program	1 point	2
	Car/vanpool program with preferred parking	2 points	
	Car/vanpool with guaranteed ride home program	3 points	
	Subsidized employee incentive car/vanpool program	5 points	
	Combination of all the above	6 points	
Employee Bicycle/ Pedestrian Programs	Complete sidewalk to residential within ½ mile	1 point	1
	Complete bike path to residential within 3 miles	1 point	
	Bike lockers and secure racks	1 point	2
	Showers and changing facilities	2 points	
	Subsidized employee walk/bike program	3 points	
	Note combine all applicable points for total value		
Shuttle/Transit Programs	Local transit within ¼ mile	1 point	
	Light rail transit within ½ mile	3 points	
	Shuttle service to light rail transit station	5 points	
	Guaranteed ride home program	1 points	
	Subsidized Transit passes	2 points	
	Note combine all applicable points for total value		
CRT	Employer based Commute Trip Reduction (CRT). CRTs apply to commercial, offices, or industrial projects that include a reduction of vehicle trip or VMT goal using a variety of employee commutes trip reduction methods. The point value will be determined based upon a TIA that demonstrates the trip/VMT reductions. Suggested point ranges:  Incentive based CRT Programs (1-8 points)  Mandatory CRT programs (5-20 points)	TBD	
Other Trip Reductions	Other trip or VMT reduction measures not listed above with TIA and/or other traffic data supporting the trip and/or VMT for the project.	TBD	

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Feature	Description	Assigned Point Values	Project Points
<b>Reduction Measure R2T4: Signal Synchronization and Intelligent Traffic Systems</b>			
Signal improvements	Signal synchronization-1 point per signal Traffic signals connected to ITS	1 point/signal 3 points/ signal	
<b>Reduction Measure R2T5: Renewable Fuel/Low Emissions Vehicles</b>			
Electric Vehicle Recharging	Provide circuit and capacity in garages/parking areas for installation of electric vehicle charging stations. Install electric vehicle charging stations in garages/parking areas	2 points/area 8 points/station	2
<b>Reduction Measure R2T6: Vehicle Trip Reduction Measures</b>			
Mixed Use	Mixes of land uses that complement one another in a way that reduces the need for vehicle trips can greatly reduce GHG emissions. The point value of mixed use projects will be determined based upon traffic studies that demonstrate trip reductions and/or reductions in vehicle miles traveled	TBD	
Local Retail Near Residential (Commercial only Projects)	Having residential developments within walking and biking distance of local retail helps to reduce vehicle trips and/or vehicle miles traveled. The point value of residential projects in close proximity to local retail will be determined based upon traffic studies that demonstrate trip reductions and/or reductions in vehicle miles traveled	TBD	
<b>Reduction Measure R2W5: Construction and Demolition Debris Diversion Program</b>			
Recycling of Construction/ Demolition Debris	Recycle 2% of debris (required) Recycle 5% of debris Recycle 8 % of debris Recycle 10% of debris Recycle 12% of debris Recycle 15% of debris Recycle 20% of debris	0 points 1 point 2 points 3 points 4 points 5 points 6 points	5
<b>Reduction Measure R2W6: 75 Percent Solid Waste Diversion Program</b>			
Recycling	County initiated recycling program diverting 75% of waste requires coordination with commercial development to realize this goal. The following recycling features will help the County fulfill this goal:  Provide separated recycling bins within each commercial building/floor and provide large external recycling collection bins at central location for collection truck pick-up  Provide commercial/industrial recycling programs that fulfills an on-site goal of 75% diversion of solid waste	2 points  5 points	5
<b>Total Points Earned by Commercial/Industrial Project:</b>			<b>111</b>