

SAN BERNARDINO
ASSOCIATED GOVERNMENTS
**SAN BERNARDINO COUNTY REGIONAL
GREENHOUSE GAS EMISSIONS
INVENTORIES AND REDUCTION PLAN**
Environmental Impact Report

SCH No. 2012111046

Volume XXIII: Draft EIR (Chapter 5 to Appendix B)

Prepared for



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CHAPTER 5 Other CEQA Considerations

Section 15126 of the California Environmental Quality Act (CEQA) Guidelines requires that all aspects of a project must be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation. As part of this analysis, the Environmental Impact Report (EIR) must also identify (1) significant irreversible environmental changes that would result from implementation of the proposed project, (2) growth-inducing impacts of the proposed project (3) mitigation measures proposed to minimize significant effects, (4) significant environmental effects that cannot be avoided if the proposed project is implemented, (5) environmental impacts of the overall Regional Reduction Plan, and (6) alternatives to the proposed project.

5.1 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL EFFECTS

CEQA Guidelines Section 15126.2(c) requires a discussion of any significant irreversible environmental changes that the proposed project would cause. Specifically, Section 15126.2(c) states:

Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts, and particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irrecoverable commitments of resources should be evaluated to assure that such current consumption is justified. Section 15126.2(c)

The proposed project does not propose new development; the Regional Reduction Plan facilitates intensification of development in transit-oriented areas in accordance with the adopted General Plans for the Partnership Cities. Construction of renewable energy-generating facilities and energy retrofits on existing structures would entail a small commitment of energy, human resources, and building materials. This commitment of energy, personnel, and building materials would be commensurate with that of other projects of similar magnitude, and none of these commodities is in short supply.

Maintenance of new renewable energy-generating facilities would entail a further commitment of energy resources in the form of natural gas, electricity, and water resources. However, this commitment would be minimal, consisting of routine maintenance of solar panels and wind turbines. The Regional Reduction Plan does not propose any development that would otherwise entail commitment of energy resources. In fact, the proposed Regional Reduction Plan would result in the long-term reduction in energy demand and reduction of vehicular air and noise pollution, which are beneficial impacts. Therefore, the proposed project would not result in any significant irreversible environmental changes.

5.2 GROWTH-INDUCING IMPACTS

CEQA Guidelines Section 15126.2(d) requires that this section discuss the ways in which the proposed project could foster economic, population, or housing growth, either directly or indirectly, in the surrounding environment. Growth-inducing impacts are caused by those characteristics of a project that tend to foster or encourage population and/or economic growth. Inducements to growth include the

generation of construction and permanent employment opportunities in the service sector of the economy. A project could also induce growth by lowering or removing barriers to growth or by creating an amenity that attracts new population or economic activity.

Plans for the reduction of GHG emissions are not, by their nature, growth inducing. The Regional Reduction Plan provides a framework for reducing GHG emissions from existing and future development that has previously been planned for in the Partnership Cities' General Plans. While the Regional Reduction Plan recommends intensification of land uses around the transit station, this growth has already been accounted for in the Partnership Cities' General Plans, and the Regional Reduction Plan, on its own, does not induce growth. The Regional Reduction Plan objectives promote the internal relationship of mutually supportive uses in transit-oriented areas so as to decrease dependency on the automobile, encourage alternative transportation modes, make efficient use of land and infrastructure, reduce energy consumption, and promote sustainability.

In addition, because the project does not propose development, it would not induce growth in an area that is not already developed with infrastructure to accommodate such growth. As discussed in Section 4.1.14 through 4.21.14 (Public Services) and Sections 4.1.17 through 4.21.17 (Utilities/Service Systems), does not include the construction of new infrastructure that would promote growth in a location that is not already planned for development. Thus, the necessary infrastructure that normally triggers growth when introduced is already in place within the Partnership Cities with respect to the proposed project.

A project's growth-inducing potential does not automatically result in growth, whether it is a portion of growth or actually exceeds projected levels of growth. Growth at the local level is fundamentally controlled by the land use policies of local municipalities or counties, which are determined by the local politics in each jurisdiction.

5.3 MITIGATION MEASURES PROPOSED TO MINIMIZE SIGNIFICANT EFFECTS OF THE PROPOSED PROJECT

Table 2-22 (Summary of Mitigation Measures), which is contained in Chapter 2 (Summary) of this EIR, provides a comprehensive identification of the proposed project's mitigation measures. These measures will be implemented as applicable by the Lead Agency or each of the Participating Cities acting a responsible agency. As Responsible Agencies under CEQA, each of the Participating Cities is responsible for the mitigation measures within their jurisdiction applicable to their adopted CAP or GHG Reduction Plan.

5.4 SIGNIFICANT ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED

CEQA Guidelines Section 15126.2(b) requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. Development of the proposed project would not result in significant and unavoidable project-related and/or cumulative impacts. All project-level and cumulative environmental impacts of the Regional Reduction Plan are determined to be

no impact, a less than significant impact or reduced to a less than significant impact with mitigation. The impacts and level of significance are shown in Table 2-1 (Summary of Environmental Impacts of Implementing Local Reduction Measures in Adelanto) through Table 2-21 (Summary of Environmental Impacts of Implementing Local Reduction Measures in Yucca Valley) in Chapter 2 and described in detail in Chapter 4 (Environmental Analysis) of this EIR.

5.5 ENVIRONMENTAL IMPACTS OF THE OVERALL SAN BERNARDINO COUNTY REGIONAL GHG REDUCTION PLAN

SANBAG is Lead Agency under CEQA. SANBAG has authority for measures in the Regional Reduction Plan that it adopts, facilitates or funds. Each Participating City as a Responsible Agency will decide whether or not to adopt certain individual elements of the Regional Reduction Plan as part of their decision on the adoption of a CAP or Greenhouse Gas Reduction Plan within their jurisdiction. The Participating Cities that adopt a CAP or Greenhouse Gas Reduction Plan are responsible for the reduction measures, resulting impacts, and associated mitigation measures within their jurisdictions. Therefore project-level impacts of the overall Regional Reduction Plan are analyzed within each Participating City Section of Chapter 4 of this EIR.

CEQA requires that EIRs discuss a project's potential contributions to cumulative impacts, in addition to project-specific impacts. CEQA Guidelines Section 15130(a)(1) states that a "cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts." Because the cumulative analysis within each City Section of Chapter 4 of this EIR evaluates the impacts of all the Partnership Cities implementing the Regional Reduction Plan within their jurisdictions and how this cumulative implementation would impact the region these cumulative analyses determine the impacts of the overall Regional Reduction Plan. Therefore, impacts of the combination of the individual city's adoption of the CAP(s)/Greenhouse Gas Reduction Plan(s) are included in the cumulative analysis within each Participating City Section of Chapter 4 of this EIR.

In addition to reviewing environmental impacts for each environmental criterion, Mandatory Findings of Significance need to be made concerning the overall Regional Reduction Plan. The following section provides the Mandatory Findings of Significance:

5.5.1 Mandatory Findings of Significance

Threshold	Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?
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The Regional Reduction Plan will not degrade the quality of the environment, substantially reduce habitat, cause fish or wildlife populations to drop, threaten or eliminate a plant or animal community, reduce the range of a plant or animal, or eliminate important examples of California history or prehistory.

Details on habitat and wildlife for each Partnership City can be found in Sections 4.1.4 through 4.21.4 (Biological Resources) of this EIR which fully addresses impacts related to the reduction of the fish or wildlife habitat, the reduction of fish or wildlife populations, and the reduction or restriction of the range of special-status species. All these biological impacts are determined to be no impact or a less than significant impact. Sections 4.1.5 through 4.21.5 (Cultural Resources) of this EIR fully addresses impacts related to California history and prehistory, historic resources, archaeological resources, and paleontological resources. All these biological impacts are found to be no impact, less than significant impact or less than significant impact with mitigation. Therefore, the Project **does not** have any significant impact due to the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory.

Threshold	Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?
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The Regional Reduction Plan does not contribute to or create a cumulative impact. Cumulative impacts are addressed in this EIR for each of the environmental topics. Details of those discussions can be found at the end of each subsection in Chapter 4 of this EIR. The EIR does not identify any cumulatively considerable contributions of the Project to significant cumulative impacts. Therefore, the Project does not have impacts that are individually limited, but cumulatively considerable.

Threshold	Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?
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Consistent with CEQA Guidelines Section 15065(a)(4), a lead agency shall find that a project might have a significant effect on the environment where there is substantial evidence that the project has the potential to cause substantial adverse effects on human beings, either directly or indirectly. Under this standard, a change to the physical environment that might otherwise be minor must be treated as significant if people would be significantly affected. This factor relates to adverse changes to the environment of human beings generally, and not to effects on particular individuals. While changes to the environment that could indirectly affect human beings would be represented by all of the designated CEQA issue areas, those that could directly affect human beings include air quality, geology/soils, hazards/hazardous materials, hydrology/water quality, noise, population/housing, public services, transportation/traffic, and utilities/service systems, which are addressed in Sections 4.1.3 through 4.21.3, 4.1.6 through 4.21.6, 4.1.8 through 4.21.8, 4.1.9 through 4.21.9, 4.1.12 through 4.21.12, 4.1.13 through 4.21.13, 4.1.14 through 4.21.14, 4.1.16 through 4.21.16, and 4.1.17 through 4.21.17 of this EIR, respectively. In each of these sections, the Regional Reduction Plan was determined to have **less-than-significant** impacts. Therefore, the Project does not have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly.

5.6 ALTERNATIVES TO THE PROPOSED PROJECT

Alternatives to the proposed project are presented in Chapter 6 (Alternatives to the Proposed Project) of this EIR.

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CHAPTER 6 Alternatives to the Proposed Project

6.1 INTRODUCTION

In accordance with CEQA Guidelines Section 15126.6, EIRs are required to include a discussion of alternatives to a proposed project. As Per CEQA Guidelines Section 15126.6(a) an EIR must describe a range of reasonable alternatives to a project that would attain most of the basic objectives of a project while reducing one or more of the significant impacts of the project, and should evaluate the comparative merits of those alternatives.

Public Resources Code Section 21002 states, in pertinent part:

In determining the nature and scope of alternatives to be examined in an EIR, the Legislature has decreed that local agencies shall be guided by the doctrine of “feasibility.” It is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects. In the event specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof.

CEQA Guidelines Section 15364 defines feasible, for purposes of CEQA review, as “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, legal, and technological factors.”

CEQA establishes no categorical legal imperative as to the scope of alternatives to be analyzed in an EIR. Both the California and the federal courts have declared that the statutory requirements for consideration of alternatives must be judged against a rule of reason. CEQA Guidelines Section 15126.6(f) defines the “Rule of Reason,” which requires that an EIR set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to those that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR is (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to offer substantial environmental advantages over the project proposal (CEQA Guidelines Section 15126.6(c)). Factors relevant to the feasibility or infeasibility of a project alternative can include excessive cost and lack of control of an alternative site by the lead agency or project sponsor.

Key provisions of the CEQA Guidelines relating to the Alternatives analysis (Sections 15126.6 et seq.) are summarized below:

- The discussion of Alternatives shall focus on Alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project, even if these Alternatives would impede to some degree the attainment of the project objectives, or would be more costly.

- The “no project” Alternative shall be evaluated along with its impact. The “no project” analysis shall discuss the existing conditions, as well as what would be reasonably expected to occur in the foreseeable future if the project is not approved.
- The range of Alternatives required in an EIR is governed by a “rule of reason”; therefore, the EIR must evaluate only those Alternatives necessary to permit a reasoned choice. The Alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project.
- For Alternative locations, only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.
- An EIR need not consider an Alternative whose effects cannot be reasonably ascertained and whose implementation is remote and speculative.

6.2 SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS IDENTIFIED FOR THE PROPOSED PROJECT

No significant unavoidable adverse impacts were identified for the proposed Regional Plan.

6.3 ALTERNATIVES ANALYZED IN THE EIR

As no significant adverse impacts were identified for the proposed project, the alternative analyzed in this chapter includes the No Project/Reasonably Foreseeable Development Alternative. CEQA Guidelines Section 15126.6(e)(3)(A) states that when the project is the revision of an existing land use or regulatory plan, policy, or ongoing operation, the “no project” alternative will be the continuation of the existing plans, policies, or operations into the future.

The SANBAG and the Partnership Cities are committed to providing a more livable, equitable and economically vibrant community through the reduction of greenhouse gas (GHG) emissions. By using energy more efficiently, harnessing renewable energy to power our buildings, recycling our waste, and enhancing access to sustainable transportation modes, the region can keep dollars in our local economy, create new green jobs, and improve community quality of life. SANBAG and the Partnership Cities are working collaboratively toward these common goals. These efforts toward reducing GHG emissions must be done in coordination with each Partnership City’s land use decisions. To achieve these goals, SANBAG and the Partnership Cities have committed to the following Project Objectives for the Regional Plan:

- Create a GHG baseline for each of the Partnership Cities to benchmark reductions.
- Prepare a future year (2020) GHG emissions forecast for each of the Partnership Cities.
- Develop a tool for each of the Partnership Cities to use in developing its municipal GHG emissions inventory and municipal reduction plan.
- Develop feasible and cost effective GHG reduction targets and measures, and City selection of targets and measures appropriate for each Partnership City.

- Provide a regional plan that is consistent with and complementary to the GHG emissions reduction efforts being conducted by San Bernardino County, the State of California through AB 32, and the federal government through the actions of the U.S. EPA.
- Develop “the basis for” community climate action plans (CAPs) for each of the Partnership Cities meeting their identified reduction goals.
- Provide all the technical data needed for each Partnership City to establish a CAP that fulfills all the qualifications identified in CEQA Guidelines Section 15183.5 from which future development within the Participating City adopting the “qualified CAP” can tier and thereby streamline the environmental analysis necessary under CEQA.

The Regional Plan does not include land use changes, but, rather, supports the land uses described in the Partnership Cities’ General Plans. The Regional Plan achieves the purpose and goals described above by providing: an analysis of GHG emissions and sources attributable to each of the Partnership Cities; estimates on how those emissions are expected to increase; recommended policies and actions that can reduce GHG emissions to meet state, federal, and international targets; and a timeline of implementation.

The Regional Plan will ensure that land use decisions made by the Partnership Cities are consistent with adopted state legislation, minimize air quality impacts, and maximize energy conservation. Because the Regional Plan does not propose development, but, rather, includes policies to facilitate sustainable development and guide land use decisions within the SANBAG region together with and as part of the Partnership Cities’ General Plans, there are no other alternative locations for the project appropriate for analysis under CEQA.

During the Scoping Meeting, a participant suggested that SANBAG should analyze the use of greenhouse gas emission credits to achieve the reduction targets as an alternative to the Regional Plan. This method of reducing GHG emissions would involve SANBAG and/or the Partnership Cities purchasing GHG emission credits in an emissions market.

6.3.1 Alternative 1: No Project/Reasonably Foreseeable Development.

■ Description of Alternative

The Regional Plan pertinent to each Partnership City’s jurisdiction will be used together with and as part each Partnership City’s General Plan to guide land use decisions into the future. Therefore, this alternative analyzes the environmental effects that could occur if the Regional Plan were not implemented and development within each Partnership City proceeded under their existing General Plan.

■ Potential Impacts

Aesthetics

Development that could occur under each of the existing General Plans, without implementation of the Regional Reduction Plan would not result in degradation of visual character or quality of each City, as development would be required to comply with design guidelines in the General Plans, Municipal Codes,

and applicable Specific Plans. These design guidelines govern required setbacks, densities, building heights, massing, appropriate step-downs, and other architectural requirements for each Partnership City to ensure a high quality of development. Mitigation to address the potential impact of renewable energy sources impacting scenic vistas, degrading the visual character, or creating new sources of glare reduce these impacts of the Regional Plan to less than significant. Thus, the impact from future development on visual character and quality would be less than significant, similar to the proposed project.

Agriculture/Forestry Resources

Under Alternative 1 development that could occur under each of the existing General Plans, without implementation of the Regional Plan would continue. Impacts to agriculture and forest resources would be identical to those addressed in the General Plan EIRs.

Air Quality

Development that could occur under each of the existing General Plans, without implementation of the Regional Plan would result in greater air quality impacts. This is because the reduction measures in the Regional Plan also reduce air pollutants resulting in less air pollution and less air quality impacts than would occur without the Regional Plan. Quantification of the reduction in air pollutants as a result of the Regional Plan are shown in Table 4.1.3-5 (MDAQMD Thresholds of Significance) through Table 4.21.3-5 (MDAQMD Thresholds of Significance) in Chapter 4 (Environmental Analysis) of this EIR. Therefore, the No-Project Alternative results in greater air quality impacts than the proposed project.

Cultural Resources

Development that could occur under each of the existing General Plans, without implementation of the Regional Plan would not result in significant impacts to the architectural character or historic quality of buildings or structures 45 years old or older within some of the Partnership Cities. Changes to or destruction of buildings or structures of that age in and of itself does not constitute a significant impact, but buildings and structures of that age need to be reviewed for their historical significance. The Regional Plan includes energy efficiency retrofits of existing buildings that could affect buildings of historic age. Mitigation to address the potential impacts to buildings and structures of historic age reduce this impact of the Regional Plan to less than significant. Thus, the impact from future development on the historic structures would be less than significant, similar to the proposed project.

Global Climate Change/Greenhouse Gas Emissions

Development that could occur under each of the existing General Plans, without implementation of the Regional Plan would result in greater impacts related to GHG emissions. While some of the Partnership Cities have GHG reduction goals within their existing General Plans, those goals do not reduce GHG emissions as much as would occur in implementing the Regional Plan. This is because the Regional Plan provides specific GHG reduction measures for each Partnership City to implement and includes a quantitative reduction target to achieve by 2020. In addition, the Regional Plan provides regional reductions that could not be achieved separately. As an example, the Sustainable Communities Strategy within the Regional Plan provides quantitative reductions within each Participating City associated with

implementing local transit oriented development and other transportation related emissions. The Sustainable Communities Strategy within the Regional Plan provides consistency in implementing local portions of SCAG's SCS within the 2012 RTP that could not be done with the goals and policies of the existing General Plans of the Participating Cities. This regional consistency toward implementing the SCS within the Participating Cities is one advantage of the Regional Plan. This is just one example. The partnership and regional nature of the Regional Plan has other advantages in reducing GHG emissions. Therefore, the No-Project Alternative results in greater impacts from GHG emissions than the proposed project.

Land Use/Planning

The Partnership Cities have existing General Plans that were adopted. These General Plans are consistent with applicable other relevant land use plans such as the AQMP and SCAG's Compass Growth Visioning. Therefore, continuation of these existing General Plans without implementation of the Regional Plan would remain consistent with these land use plans. However, without adoption of the reduction measures in the Regional Plan, some of the Partnership Cities may not be in compliance with state regulations to reduce GHG emissions, or may not be able to demonstrate to the satisfaction of the California Air Resources Board that it has done so. Also, implementation of the Sustainable Communities Strategy within the Regional Plan ensures consistency and implementation of the SCS in SCAG's 2012 RTP. The Regional Plan also provides assurance that the Partnership Cities are in compliance with AB 32. Thus, continuation of the existing General Plans without implementation of the Regional Plan would not result in the same beneficial effects of plan compliance, although it would result in a similar less-than-significant impact with respect to consistency with other identified land use plans.

Noise

Development that could occur under each of the existing General Plans, without implementation of the Regional Plan would result in greater noise impacts related to increased traffic. The transportation related GHG reduction measures in the Regional Plan results in lower vehicle miles traveled (VMT) within the Partnership Cities, which in turn results in less traffic noise impacts. Therefore, the No-Project Alternative results in greater on average noise impacts than the proposed project.

Transportation/Traffic

Similar to noise, development that could occur under each of the existing General Plans, without implementation of the Regional Plan would result in greater traffic impacts. Therefore, the No-Project Alternative results in greater on average traffic impacts than the proposed project.

Utilities/Service Systems

Development that could occur under each of the existing General Plans, without implementation of the Regional Plan would result in greater impacts to utilities and service systems. This is because the Regional Plan includes energy efficiency measures, water conservation strategies, and waste diversion strategies that reduce the need to provide additional water supplies, wastewater treatment facilities, conventional electric generation, and landfills. While some of the Partnership Cities have energy efficiency, water conservation, and waste reduction goals within their existing General Plans, those goals do not have the

specific quantified structure of the Regional Plan. Thus, continuation of the existing General Plans without implementation of the Regional Plan would not result in the same level of beneficial effects to utilities and service systems.

Other Potential Impacts

Development that could occur under each of the existing General Plans, without implementation of the Regional Plan would result in similar impacts to biological resources, geology and soils, hazards and hazardous materials, hydrology and water quality, mineral resources, public services, and recreation as what would occur with the Regional Plan. The primary reason for this is that implementation of the regional plan does not include development of land which would impact these resources.

■ Attainment of Project Objectives

The Regional Plan (Project) objectives are described in Chapter 3 (Project Description), and above (Section 6.3 [Alternatives Analyzed in the EIR]). The No-Project Alternative would not benchmark GHG emissions, prepare a future year (2020) GHG emissions forecast, or provide a plan consistent with reduction efforts being conducted by the state- and federal government. The No-Project Alternative would not guide the development, enhancement and implementation of actions that reduce GHG emissions, provide a policy document to be considered as part of the planning process for future development projects, provide a list of specific actions to reduce GHG emissions, or establish a qualified reduction plan for which future development within each of the Partnership Cities can tier. Continuation of the each Partnership City General Plan may reduce GHG emissions as a result of AB 32, but it is unlikely the Partnership Cities will be able to reduce emissions to levels at or below the AB 32 reduction target, or each Partnership City reduction target by the year 2020 without the measures contained in the Regional Plan. The No-Project Alternative would not provide “the basis for” Partnership City CAPs that fulfills all the qualifications identified in CEQA Guidelines Section 15183.5. Therefore, this alternative would not meet any of the objectives of the proposed project.

6.3.2 Alternative 2: Use of GHG Emissions Credits to Achieve the Reduction Targets.

■ Description of Alternative

In this alternative the Participating Cities would purchase GHG emission credits as the means of achieving their reduction targets rather than providing reduction measures. Most of the other components of the Regional Plan would be used in this alternative including the baseline (2008) GHG emissions inventories, future year 2020 forecasts of GHG emissions, and reduction targets for each Participating City. There are several GHG emission credit markets that could be used. The Southern California Climate Exchange administered by the South Coast Air Quality Management District (SCAQMD) is one market that SCAQMD is developing, but at this time, it is not a functioning market. The California Climate Action Reserve (CCAR) is another market that was set up to provide GHG emission credits in California. However, CCAR is transitioning to the Climate Action Reserve, which trades in forty-one states within the United States, all nine provinces in Canada, and the six northern states of Mexico. Purchasing GHG emissions credits can be achieved through The Climate Reserve.

Therefore, the analysis of this alternative reviews the environmental effects that could occur if the Regional Plan were implemented using GHG emission credits through The Climate Reserve trading programs.

■ Potential Impacts

Aesthetics

Since Alternative 2 uses GHG emission credits rather than changes in the design of new development, or energy efficiency retrofitting of existing buildings, development of new land uses in the Participating Cities in Alternative 2 would occur as defined by the existing General Plans and would not result in degradation of visual character or quality of each City. Each City requires development to comply with design guidelines in the General Plans, Municipal Codes, and applicable Specific Plans. These design guidelines govern required setbacks, densities, building heights, massing, appropriate step-downs, and other architectural requirements for each Partnership City to ensure a high quality of development. The proposed project includes mitigation to address the potential visual impacts of renewable energy sources impacting scenic vistas, degrading the visual character, or creating new sources of glare, which reduce these impacts of the Regional Plan to less than significant. Thus, the impact from future development on visual character and quality would be less than significant, similar to the proposed project.

Agriculture/Forestry Resources

Because Alternative 2 uses GHG emission credits rather than reduction measures to achieve the reduction targets, Alternative 2 would not change impacts to agricultural resources or forested lands.

Air Quality

Without implementation of the reduction measures in the Regional Plan Alternative 2 would result in greater air quality impacts than the proposed project. This is because the reduction measures in the Regional Plan also reduce air pollutants within the South Coast and Mojave Air Basins resulting in less air pollution and less air quality impacts within the Participating Cities than would occur without the Regional Plan. GHG emission credits can be in a variety of forms. Some emission credits are the result of sequestration projects that pump carbon emissions into geologic formations. That type of sequestration will not reduce air pollution. Other forms of emission credits are created due to improving the efficiency of industrial processes at electric generating facilities or oil refineries. While these types of GHG emission reductions that back up the GHG emission credits may also reduce air pollutants somewhere within the United States, Canada, or Northern Mexico, reductions in air pollution at those places do not change the air quality within the air basin occupied by the Participating Cities. Quantification of the reduction in air pollutants as a result of the Regional Plan are shown in Table 4.1.3-5 through Table 4.21.3-5 in Chapter 4 of this EIR. Therefore, the Alternative 2 results in greater air quality impacts than the proposed project.

Global Climate Change/Greenhouse Gas Emissions

Alternative 2 would reduce GHG emissions for the Partnership Cities to meet the GHG reduction goals, similar to the Regional Plan. The verification process and monitoring required of purchased GHG

emission credits under The Climate Reserve would guarantee that GHG emission credits are real reductions or sequestered GHG emissions. Therefore, Alternative 2 results in less than significant impacts from GHG emissions similar to the proposed project.

Land Use/Planning

Because Alternative 2 purchases emission credits rather than provide local reduction measures, Alternative 2 would be inconsistent with state and regional planning including the AB 32 Scoping Plan, SCAG's Compass Growth Visioning, and the RTP with an adopted SCS. Without adoption of the reduction measures in the Regional Plan, some of the Partnership Cities may not be in compliance with state regulations to reduce GHG emissions, or may not be able to demonstrate to the satisfaction of the California Air Resources Board that it has done so. Also, implementation of the Sustainable Communities Strategy within the Regional Plan ensures consistency and implementation of the SCS in SCAG's 2012 RTP. The Regional Plan also provides assurance that the Partnership Cities are in compliance with AB 32. Thus, Alternative 2 would not result in the same beneficial effects of plan compliance and would result greater impacts to land use planning within the Partnership Cities.

Noise

Because Alternative 2 reduces GHG emissions through the purchase of emission credits without implementation of the reduction measures within the Regional Plan, Alternative 2 would result in greater noise impacts related to increased traffic. The transportation related GHG reduction measures in the Regional Plan results in lower VMT within the Partnership Cities, which in turn results in less traffic noise impacts. Therefore, Alternative 2 results in greater on average noise impacts than the proposed project.

Transportation/Traffic

Similar to noise, Alternative 2 does not include the VMT reductions of the proposed project and would result in greater VMT, which creates additional traffic impacts as compared with the proposed project. Therefore, the Alternative 2 results in greater on average traffic impacts than the proposed project.

Utilities/Service Systems

Since Alternative 2 uses GHG emission credits rather than energy efficiency, water conservation, or waste diversion measures, Alternative 2 would result in greater impacts to utilities and service systems. This is because the Regional Plan includes energy efficiency measures, water conservation strategies, and waste diversion strategies that reduce the need to provide additional water supplies, wastewater treatment facilities, conventional electric generation, and landfills. Therefore, Alternative 2 results in greater impacts to utilities, water supplies and service systems within the region than the proposed project.

Other Potential Impacts

Alternative 2 would result in similar impacts to biological resources, geology and soils, hazards and hazardous materials, hydrology and water quality, mineral resources, public services, and recreation as what would occur with the Regional Plan. The primary reason for this is that the purchase of GHG emission credits does not impact these resources.

■ Attainment of Project Objectives

The Regional Plan (Project) objectives are described in Chapter 3, and above (Section 6.3 [Alternatives Analyzed in the EIR]). Alternative 2 would benchmark GHG emissions, prepare a future year (2020) GHG emissions forecast, and provide a reduction target for each Partnership City, but this Alternative would not use reduction measures to reduce GHG emissions. Alternative 2 would not guide the development, enhancement and implementation of actions that reduce GHG emissions, provide a policy document to be considered as part of the planning process for future development projects, provide a list of specific actions to reduce GHG emissions, or establish a qualified reduction plan for which future development within each of the Partnership Cities can tier. Using GHG emission credits may reduce GHG emissions, but at a much greater cost and without local or regional co-benefits of sustainable, energy efficient less polluting development within the Partnership Cities. Alternative 2 would not provide “the basis for” Partnership City CAPs that fulfills all the qualifications identified in CEQA Guidelines Section 15183.5. Therefore, this alternative would not meet three of the seven very important project objectives: (1) feasible and cost effective GHG reduction measures, (2) provide “the basis for” community CAPs, and (3) fulfilling the requirements of CEQA Guidelines Section 15183.5 from which future development within the Participating Cities can tier and thereby streamline the environmental analysis of future development necessary under CEQA.

6.3.3 Alternative 3: Renewable Energy Generation Restriction Alternative.

■ Description of Alternative

Alternative 3 is similar to the proposed project and would implement the reduction measures that are proposed in the Regional Reduction Plan. In order to address the impacts associated with the proposed project, Alternative 3 would include additional Development Code amendments within the Participating Cities by adding the following standards for the development of renewable energy generating facilities:

- Prohibit the placement of wind and solar facilities and associated supporting facilities (including transmission lines) on or within designated scenic routes or state scenic highways, parks, or other scenic resources recognized by federal, state and local jurisdictions that could be adversely impacted by facilities located on land under the Participating Cities jurisdictions.
- Prohibit the placement of large scale renewable energy facilities on farmland designated as important farmland (prime, statewide, unique), by the California Department of Conservation, Farmland Mapping and Monitoring Program (FMMP).
- Avoid siting large scale renewable energy facilities in important wildlife movement corridors, breeding areas or migration routes of any listed state or federal species or state species of concern.

■ Potential Impacts

Aesthetics

Since Alternative 3 restricts the placement of renewable energy generating facilities in areas that are considered a scenic vista, a scenic resource, and routes or existing scenic character. Thus, the impact of Alternative 3 on visual character and quality would be less than significant, similar to the proposed project.

Agriculture/Forestry Resources

Because Alternative 3 restricts alternative energy generation from being placed within scenic areas and farmlands, Alternative 3 impacts to agricultural resources or forested lands would be less than significant, similar to the proposed project.

Air Quality

Alternative 3 would restrict placement of renewable energy facilities. All other aspects of the Regional Reduction Plan remain in place including the goal of reducing GHG emissions within the region. Because Alternative 3 does not change the GHG emissions reduction within the region, impacts to air quality are less than significant, similar to the proposed project.

Global Climate Change/Greenhouse Gas Emissions

Alternative 3 would reduce GHG emissions for the Partnership Cities to meet the GHG reduction goals, similar to the Regional Plan. Therefore, Alternative 3 results in less than significant impacts from GHG emissions similar to the proposed project.

Land Use/Planning

Because Alternative 3 does not change other aspects of the Regional Reduction Plan or Participating Cities General Plans, this alternative does not change land use planning other than to apply restrictions on large utility scale renewable energy facility placements. Although Alternative 3 would place some restrictions on renewable energy facilities, it is not necessarily inconsistent with state and regional planning including the AB 32 Scoping Plan, SCAG's Compass Growth Visioning, and the RTP with an adopted SCS if the Development Code does not restrict renewable energy installation criteria or locations to the point that it limits the amount of renewable energy facilities that can be implemented. Therefore, Alternative 3 results in similar land use planning benefits as compared to the proposed project.

Noise

Because Alternative 3 would not change noise sources within the Partnership Cities and other aspects of the Regional Reduction Plan such as transportation reduction measures that lower VMT and reduces transportation related noise. Therefore, Alternative 3 results in less than significant noise impacts identical to the proposed project.

Transportation/Traffic

Similar to noise, Alternative 3 maintains the VMT reductions of the proposed project. Therefore, Alternative 3 results in less than significant traffic impacts identical to the proposed project.

Utilities/Service Systems

Alternative 3 would include additional Development Code amendments within the Participating Cities by adding restrictions to the placement of renewable energy generating facilities and associated transmission lines. As a result, additional restrictions would be placed on utility grade renewable energy projects. However, these restrictions are not anticipated to impede the ability of electric utilities to provide adequate electric generation to meet demand. Therefore, Alternative 3 would result in less than significant impacts to utilities and service systems, similar to the proposed project.

Other Potential Impacts

Alternative 3 would result in similar impacts to biological resources, geology and soils, hazards and hazardous materials, hydrology and water quality, mineral resources, public services, and recreation as what would occur with the Regional Reduction Plan.

■ Attainment of Project Objectives

The Regional Plan (Project) objectives are described in Chapter 3, and above (Section 6.3 [Alternatives Analyzed in the EIR]). Alternative 3 would benchmark GHG emissions, prepare a future year (2020) GHG emissions forecast, and provide a reduction target for each Partnership City, but this Alternative would place restrictions on the placement of renewable generation facilities. Therefore, this alternative would be consistent with all seven project objectives.

6.4 COMPARISON OF ALTERNATIVES

Under the No-Project Alternative there would be no method to benchmark GHG emissions, provide a plan consistent with reduction efforts being conducted state- and worldwide, would not guide the development, enhancement and implementation of actions that reduce GHG emissions, provide a policy document to be considered as part of the planning process for future development projects, provide a list of specific actions to reduce GHG emissions, or establish a qualified reduction plan for which future development within the City can tier.

Alternative 2 would provide a method to benchmark GHG emissions and through emission credits reduce GHG emissions consistent with the reduction targets, but this alternative would not guide the development, enhancement and implementation of actions that reduce GHG emissions, provide a policy document to be considered as part of the planning process for future development projects, provide a list of specific actions to reduce GHG emissions, or establish a qualified reduction plan for which future development within the City can tier. Therefore, both alternatives would not meet many of the objectives of the proposed project. In addition, Alternatives 1 and 2 have greater impacts on the environment than the proposed Project. Table 6-1 (Comparison of Alternatives and Proposed Project Impacts) summarizes the comparison.

Table 6-1 Comparison of Alternatives and Proposed Project Impacts				
<i>Environmental Issue Area</i>	<i>Proposed Project</i>	<i>Alternative 1</i>	<i>Alternative 2</i>	<i>Alternative 3</i>
Aesthetics	Equal to GPs	=	=	=
Agriculture/Forestry	Equal to GPs	=	=	=
Air Quality	Reduces pollutants	+	+	=
Global Climate Change/GHG Emissions	Reduces GHG emissions	+	+	=
Land Use	Compliant with RTP SCS	=	+	=
Noise	Reduces noise	+	+	=
Transportation/Traffic	Reduces VMT	+	+	=
Utilities and Service Systems	Reduces Utility impacts	+	=	=
Other Potential Impacts	Equal to GPs	=	=	=

GPs = The existing General Plans of the Partnership Cities
 (-) = impacts considered to be less when compared with the proposed project
 (+) = impacts considered to be greater when compared with the proposed project
 (=) = impacts considered to be equal or similar to the proposed project

Alternative 3 would restrict the placement of renewable energy generation facilities in order to address potential aesthetic impacts. Under Alternative 3 environmental impacts are less than significant similar to the proposed project.

Alternatives 1 and 2 would not meet many of the objectives of the proposed project. In addition, Alternatives 1 and 2 have greater impacts on the environment than the proposed Project. By contrast, Alternative 3 has similar or identical impacts as those identified for the proposed project. Table 6-1 summarizes the comparison.

6.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The No Project/Reasonably Foreseeable Development Alternative would not be environmentally superior to the proposed project on the basis of the minimization or avoidance of physical environmental impacts. With respect to GHG emissions, the No Project Alternative would have potentially greater, and possibly significant, impacts.

Alternative 2 would not be environmentally superior to the proposed project on the basis of the minimization or avoidance of physical environmental impacts. With respect to air pollution, noise, traffic, Alternative 2 would have potentially greater impacts.

Alternative 3 would result in environmental impacts identical to the proposed project. However, enacting 21 separate development code updates by the 21 Partnership Cities becomes extremely complex and time consuming. A more uniform way of addressing potential aesthetic impacts resulting from renewable energy facilities is to have a mitigation measure that each of the Partnership Cities as Responsible Agencies under CEQA would implement.

Therefore, according to the above analysis and as summarized in Table 6-1, both the proposed project and Alternative 3 reduce all impacts to less than significant. Therefore, Alternative 3 is the environmentally superior alternative, although its impact would be similar to the Proposed Project. However, due to the complexity of enacting 21 separate development code updates within each of the 21 Participating Cities, the proposed project with the mitigation to address aesthetics impacts as shown in Chapter 4 of the EIR, would be easier to implement and have similar environmental impacts to Alternative 3.

6.6 REFERENCES

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