

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

SCH No. 2012111046

Volume XXIV: Final EIR (Administrative Final 1)

Prepared for



San Bernardino Associated Governments
SANBAG Planning Department
1170 W. 3rd Street, 2nd Floor
San Bernardino, California 92410-1715

Prepared by

ATKINS

650 E. Hospitality Lane, Suite 460
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February 2014

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CHAPTER 1 Introduction

The San Bernardino Associated Governments (SANBAG) is the Lead Agency for the Environmental Impact Report (EIR) for the San Bernardino County Regional GHG Reduction Plan (Regional Reduction Plan), further described in the Draft EIR. SANBAG released the Draft EIR and held a 60-day public review period on the Draft EIR beginning October 21, 2013, and ending on December 20, 2013.

In accordance with Section (§) 15088 of the State of California Environmental Quality Act (CEQA) Guidelines, this document responds to comments received on the Draft EIR.

This Response to Comments document has been organized into four sections:

- **Section 1: Introduction.**
- **Section 2: List of Commenters**—Provides a list of the agencies, organizations, and individuals that commented on the Draft EIR.
- **Section 3: Responses to Comments**—Includes a copy of all the letters received and provides responses to the comments made in those letters. Each comment letter has been assigned an alphabetic designation and individual comments are assigned a number for easy cross reference to our response. The responses explain the Draft EIR analysis, support Draft EIR conclusions, or provide information, corrections, or clarification, as appropriate. Unless otherwise noted, references herein are related to the Draft EIR. For reading ease, this section is organized with our responses immediately following the commenter’s letter.
- **Section 4: Errata and Refinements to the Draft EIR**—Includes a listing of refinements and clarifications which have been incorporated into the text of the Draft EIR and are part of the Final EIR.

1.1 FINAL EIR

This Response to Comments document is part of the Final EIR, which includes the following, pursuant to § 15132 of the State CEQA Guidelines:

- (a) The Draft EIR and Errata and refinements to the Draft.
- (b) Comments and recommendations received on the Draft EIR either verbatim or in summary.
- (c) A list of persons, organizations, and public agencies commenting on the Draft EIR.
- (d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.

1.2 CONTENT OF THIS DOCUMENT

This Response to Comment document includes the responses to agency comments as well as all other written comments received on the Draft EIR with the related response.

1.3 NEW INFORMATION AND CHANGES TO THE EIR

Information contained within this document clarifies or supplements information presented in the Draft EIR. This information does not constitute substantial new information as defined in CEQA Guidelines § 15088.5; nor does this information ultimately change the findings made in the EIR. Therefore, this document is not subject to recirculation, nor does it trigger any of the recirculation requirements for the Draft EIR as defined in CEQA Guidelines § 15088.5.

CHAPTER 2 List of Commenters

<i>Commenters</i>	<i>Author Code</i>
Public Agencies	
California Governor's Office of Planning and Research, State Clearinghouse	A
City of Yucaipa	B
City of San Bernardino	C
Interested Parties	
Center for Biological Diversity	D
Building Industry Legal Defense Council	E

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CHAPTER 3 Response to Comments

3.1 INTRODUCTION

In accordance with CEQA Guidelines § 15088, the San Bernardino Associated Governments (SANBAG) as the Lead Agency for the proposed project, evaluated comments received on the Draft EIR (State Clearinghouse No. 2012111046) for the San Bernardino County Regional Greenhouse Gas Reduction Plan (Regional Reduction Plan) and has prepared the following responses to the comments received.

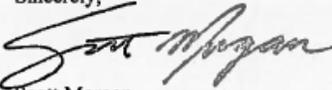
The Draft EIR was distributed for a 60-day public review period by SANBAG on October 21, 2013. SANBAG used several methods to elicit comments on the Draft EIR. Copies of the Draft document were distributed to state agencies through the State Clearinghouse of the Governor's Office of Planning and Research; a Notice of Availability (NOA) of Draft EIR and the draft document were distributed to federal agencies, state agencies, local agencies, individuals, and organizations, the NOA was posted at the County of San Bernardino Clerk of the Board office indicating where copies of the Draft EIR could be obtained or reviewed, including the following City or County Library locations: Victorville, Twentynine Palms, Big Bear Lake, Chino Hills, Hesperia, & Yucaipa, Summit, Ovitt Family Community Library, and Needles. In addition copies of the Draft EIR could be obtained at the SANBAG office; and SANBAG published the Notice of Availability of Draft EIR in the newspaper.

3.2 COMMENT LETTERS AND RESPONSES

The comment letters and responses are provided below.

3.2.1 Public Agencies

■ California Governor's Office of Planning and Research, State Clearinghouse

	<p>STATE OF CALIFORNIA Governor's Office of Planning and Research State Clearinghouse and Planning Unit</p>	
<p>Edmund G. Brown Jr. Governor</p>		<p>Ken Alex Director</p>
<p>December 20, 2013</p>		
<p>Steve Smith San Bernardino Associated Governments 1170 W. 3rd Street, 2nd Floor San Bernardino, CA 92410-1715</p>		
<p>Subject: San Bernardino County Regional Greenhouse Gas Emissions Inventory and Reduction Plan SCH#: 2012111046</p>		
<p>Dear Steve Smith:</p>		
<p>The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on December 19, 2013, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.</p>		
<p>Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.</p>		
<p>Sincerely,</p>		
		
<p>Scott Morgan Director, State Clearinghouse</p>		
<p>1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044 TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov</p>		

**Document Details Report
State Clearinghouse Data Base**

SCH# 2012111046
Project Title San Bernardino County Regional Greenhouse Gas Emissions Inventory and Reduction Plan
Lead Agency San Bernardino Associated Governments

Type EIR Draft EIR
Description Note: Extended Per Lead

The Project is a plan for the reduction of GHG emissions within the 21 Partnership cities in San Bernardino County. The 21 Partnership cities are Adelanto, Big Bear Lake, Chino, Chino Hills, Colton, Fontana, Grand Terrace, Hesperia, Highland, Loma, Linda, Montclair, Needles, Ontario, Rancho Cucamonga, Redlands, Rialto, San Bernardino, Twentynine Palms, Victorville, Yucaipa, and Yucca Valley. SANBAG is the Lead Agency. The Plan has quantified 2008 baseline GHGE inventories; 2020 Business As Usual (BAU) inventories; and a 2020 reduced emissions inventories for each City. The Plan includes reduction targets and a set of reduction measures to achieve the reduction target for each City. The EIR addresses impacts as checked above associated with implementation of the Reduction Measures within the Plan.

Lead Agency Contact

Name Steve Smith
Agency San Bernardino Associated Governments
Phone 909 844 8276 **Fax**
email
Address 1170 W. 3rd Street, 2nd Floor
City San Bernardino **State** CA **Zip** 92410-1715

Project Location

County San Bernardino
City
Region
Lat / Long 34° 6' 29" N / 117° 17' 20" W
Cross Streets Entire County Area
Parcel No. Entire County area
Township **Range** **Section** **Base**

Proximity to:

Highways I-15,I-40,SR215, SR210
Airports
Railways BNSF, UNION PACIFIC
Waterways Santa Ana River, Mojave River, and tributaries.
Schools
Land Use All land uses within the 21 Partnership cities throughout San Bernardino County

Project Issues Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Economics/Jobs; Flood Plain/Flooding; Forest Land/Fire Hazard; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Supply; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects; Aesthetic/Visual

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 6; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 8; Air Resources Board; Regional Water Quality Control Board, Region 8; Native American Heritage Commission; Public Utilities Commission

Date Received 10/21/2013 **Start of Review** 10/21/2013 **End of Review** 12/19/2013

Note: Blanks in data fields result from insufficient information provided by lead agency.

■ **California Governor’s Office of Planning and Research, State Clearinghouse**

Response to Comments

The State Clearinghouse letter is acknowledgement that they submitted copies of the Draft EIR to selected state agencies for review.

■ City of Yucaipa

December 17, 2013



SANBAG
Attn: Steve Smith, Director of Planning
1170 W. 3rd Street, 2nd Floor
San Bernardino, CA 92410-1715

Regarding: San Bernardino County Regional GHG Reduction Plan EIR

Thank you for the opportunity to respond to the San Bernardino County Regional GHG Reduction Plan EIR. In reviewing the draft San Bernardino County Regional Greenhouse Gas Reduction Plan and the draft EIR, the City of Yucaipa has the following comments:

1. Page 4.20-1: Table 4.20-1 states that the projected 2020 population, our adopted Housing Element states that the City's 2010 population was 51,376, and the 2020 population is expected to be 9% higher, which would be 56,000. The City's ultimate build out is projected to be 75,000 residents. 1
2. Page 4.20-1: Table 4.20-1: The 2020 Retail projections are not accurate. The table as written indicates 2,107 retail jobs in 2020, and 2,078 retail jobs existing in 2008. That is an increase of only 29 jobs. Our Freeway Corridor Specific Plan area alone includes 242.5 acres of Regional Commercial zoned property which will allow and encourage commercial centers drawing from the entire region, not just the city of Yucaipa. The Freeway Corridor Specific Plan is in place, but no development n has occurred to this point within its boundaries. However, the city is certain that development in this area will occur between now and 2020. Much of the regional Commercial zoned land in this Specific Plan will be retail oriented, but some may also be entertainment, office and other types of commercial uses. Not only that, there are other retail opportunities throughout the remainder of the City. 2
3. Page 4.20-1: Table 4.20-1: Related to the previous comment, I feel that adjustments to retail projections will significantly affect the 2020 Employment projections. 3
4. Page 3-195 of the Draft GHG Reduction Plan: It seems that Yucaipa's 2020 "Remaining GHG" emission target is more than meeting reduction target of 15%. Is the City of Yucaipa being burdened with more than our "fair share" of reduction measures? Please explain. Is it possible to simply meet the 15% reduction target? 3
5. In closing, I want to state that most these questions were asked in an October 4, 2013 e-mail sent from me to SANBAG. I did receive the correspondence from previous City staff dated December 11, 2012 stating that the inventory and reduction measures in the draft GHG Reduction Plan have been reviewed. However, in my capacity as Director of Development Services since April 2013, I am respectfully requesting that the retail and employment projections indicated in Table 4.20-1 be amended. The projections for 2020 are simply too low and are inaccurate. The City feels that it is inadvisable to have inaccurate projections in a regional plan of this significance. 4

Sincerely,

CITY OF YUCAIPA

Joseph M. Lambert
Director of Development Services

■ City of Yucaipa

SANBAG considers the City of Yucaipa an important Responsible Agency in the Project and appreciates the City's concerns. SANBAG also appreciates Yucaipa's participation in the project meetings provided over the last two years. There are additional opportunities for Yucaipa to participate in the Project as SANBAG provides GHG Reduction Measure Implementation and Monitoring Tools for the participating cities to use in drafting their own climate action plans using the technical data provided by SANBAG in the San Bernardino County Regional Greenhouse Gas Reduction Plan (Regional Reduction Plan).

The following addresses the comments found in the City of Yucaipa comment letter:

Response to Comments

Comment 1: Our adopted Housing Element states that the City's 2010 population was 51,376 and the 2020 population is expected to be 9% higher, which would be 56,000 ...

Response to Comment 1: The population figures in the Regional Reduction Plan and associated Draft EIR (Table 4.20-1) are based on SCAG population statistics for the City of Yucaipa for the Regional Reduction Plan baseline year 2008 (51,217) and an estimated 2020 population of 55,821 based upon a nine percent growth between 2008 and 2020. The Regional Reduction Plan analysis of emissions based upon the 2008 population and 2020 growth forecasts was developed in 2012. . The City of Yucaipa Housing Element was adopted in April 2013. Your updated 2020 forecasts of 56,000 residents is 179 more than what was anticipated in the Regional Reduction Plan. ICF provided an analysis of this minor increase and it showed that the City can still meet the reduction target using the current set of reduction measures (ICF 2014). Therefore, this minor increase in the 2020 population can easily be included as an update in population forecasts during the drafting of a climate action plan should Yucaipa decide to draft a climate action plan.

Comment 2: The 2020 Retail projections are not accurate. The table [Table 4.20-1 in the Draft EIR] as written indicates that 2,170 retail jobs in 2020 ... This is an increase of only 29 jobs. Our Freeway Corridor Specific Plan area alone includes 242.5 acres of Regional Commercial zoned property which will allow and encourage commercial centers drawing from the entire region ... The city is certain that development in this area will occur between now and 2020 ...

Response to Comment 2: The information in the Regional Reduction Plan and Draft EIR are accurate. The growth in retail jobs within the Regional Reduction Plan and associated Draft EIR (Table 4.20-1) are based on SCAG statistics for the City of Yucaipa within the Regional Transportation Plan (RTP). In response to your comment concerning additional jobs within the City of Yucaipa in 2020, ICF provided an analysis of GHG emissions that would occur if growth of retail jobs was 48% (1,000 additional jobs) between 2008 and 2020. The conclusion of that analysis was that with the current GHG reduction measures in place, the City still meets the 2020 Reduction Target with the increase in population and jobs (ICF 2014). This analysis can easily be included as an update in jobs forecasts during the drafting of a climate action plan should Yucaipa decide to draft a climate action plan.

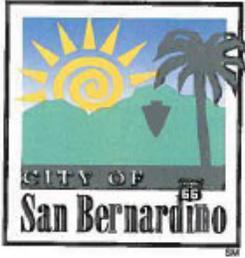
Comment 3: It seems that Yucaipa’s 2020 “Remaining GHG” emissions target is more than meeting [the] reduction target of 15% [below 2008 levels of emissions by year 2020]. Is the City of Yucaipa being burdened with more than our “fair share” of reduction measures? Please explain. Is it possible to simply meet the 15% reduction target?

Response to Comment 3: During the spring of 2012 City staff was provided an Excel spreadsheet tool that had the 2008 baseline GHG emission inventories, a projection of GHG emissions in 2020 and reductions afforded the City by State and Regional GHG reduction measures. The Excel spreadsheet tool also included a variety of local City initiated GHG reduction measures for the City to choose from and a variety of reduction targets. Using this tool, City staff chose the local reduction measures including the intensity of the reduction measures and the reduction target for the City. The City of Yucaipa provided the reduction measures and reduction target that City staff chose to SANBAG for inclusion into the Regional Reduction Plan in the summer of 2012. As described in the responses to comment 1 and 2, with the minor increase in population and growth of an additional 1,000 retail jobs by 2020 the City is still able to meet the reduction target with the reduction measures that are shown in the Regional Reduction Plan (ICF 2014).

Comment 4: In closing, I want to state that most [of] these questions were asked in an October 4, 2013, e-mail sent from me to SANBAG. I did receive the correspondence from previous City staff dated December 11, 2012, stating that the inventory and reduction measures in the draft [Regional] GHG Reduction Plan have been reviewed. However, in my capacity as Director of Development Services since April 2013, I am respectfully requesting that the retail and employment projections indicated in Table 4.20-1 be amended. The projections for 2020 are simply too low and are inaccurate. The City feels that it is inadvisable to have inaccurate projections in a regional plan of this significance.

Response to Comment 4: SANBAG staff received your email dated October 4, 2013. By that late date the Regional Reduction Plan was already out for public review and Draft EIR was completed and poised for public distribution. The forecasting in the Regional Reduction Plan and Draft EIR match the SCAG projections in the 2012 RTP and for this reason are not considered inaccurate. Nevertheless, as stated in the responses above the City is still able to achieve the reduction target using the reduction measures in the Regional Reduction Plan with the additional growth in population and growth 1,000 retail jobs by 2020. Because Yucaipa is able to achieve the reduction target with this additional growth using the reduction measures analyzed in the Draft EIR, the environmental impacts associated with the reduction measures remain less than significant with inclusion of the mitigation measures shown in the Draft EIR.

■ City of San Bernardino



COMMUNITY DEVELOPMENT DEPARTMENT

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DEC - 3 2013

SAN BERNARDINO
ASSOCIATED GOVERNMENTS

December 2, 2013

Mr. Steve Smith, Director of Planning
SANBAG Planning Department
1170 W. 3rd Street, 2nd Floor
San Bernardino, CA 92410-1715

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE SAN BERNARDINO COUNTY REGIONAL GREENHOUSE GAS INVENTORY AND REDUCTION PLAN

Dear Mr. Smith:

Thank you for the opportunity to review and comment on the Draft Environmental Impact Report (DEIR) for the San Bernardino County Regional Greenhouse Gas Inventory and Reduction Plan. The City of San Bernardino is excited to be a part of this important regional project. Staff has reviewed the DEIR and has the following comments on Section 18, as it relates to the City of San Bernardino.

1. Regarding Section 4.17.1, Aesthetics, the City has concerns regarding Mitigation Measures 4.17.1-1a through 1c, 4.17.1-2a through 2f and 4.17.1-3a and 3b as they relate to "energy generating structures. The City (and state law) has allowances and/or requirements for solar projects. However, the City does not currently have development standards for other types of energy generating structures, particularly wind turbines. Therefore, the City's Development Code would require an amendment to allow such structures, which is a policy decision that must ultimately be made by the City's decision makers. However, as noted in this Section of the DEIR, there is the possibility for significant adverse impacts to occur as a result of the installation of such structures. For these reasons, it is unclear at this time whether the City's decision makers would approve standards for such facilities, due to the potential impacts on viewsheds and individual properties. Due to this uncertainty, the City recommends that these mitigation measures be revised to pertain only to solar energy equipment installations. 1
2. The City adopted a new General Plan Land Use Map in February 2013. Therefore, please ensure the current General Plan Land Use Map is provided within Figure 4.17.10-2. 2

Please feel free to contact me at (909) 384-5357 or at Stewart_to@sbcity.org if you have any questions regarding this matter.

Sincerely,

Tony Stewart, AICP
Acting Director of Community Development

C:\S\Planning\Tony Stewart\Letters\ Comments on DEIR for SB County Regional GHG Inventory and Reduction Plan

■ City of San Bernardino

SANBAG considers the City of San Bernardino an important Responsible Agency in the Project and appreciates the City's concerns. SANBAG also appreciates the City's participation in the project meetings provided over the last two years. There are additional opportunities for San Bernardino to participate in the Project as SANBAG provides GHG Reduction Measure Implementation and Monitoring Tools for the participating cities to use in drafting their own climate action plans using the technical data provided by SANBAG in the San Bernardino County Regional Greenhouse Gas Reduction Plan (Regional Reduction Plan).

The following addresses the comments found in the City of Yucaipa comment letter:

Response to Comments

Comment 1: Regarding Section 4.17.1 (Aesthetics) the City has concerns regarding mitigation measures MM4.17.1-1a through -1c, MM4.17.1-2a through -2f, and MM4.17.1-3a and -3b as they relate to energy generating structures. The City (and state law) has allowances and/or requirements for solar projects. However, the City does not currently have development standards for other types of [renewable] energy generating structures, particularly wind turbines. Therefore, the City's Development Code would require an amendment to allow such structures, which is a policy decision that must ultimately be made by the City's decision makers. However, as noted in this Section of the Draft EIR, there is the possibility for significant adverse impacts to occur as a result of the installation of such [wind turbine] structures. For these reasons, it is unclear at this time whether the City's decision makers would approve standards for such facilities, due to the potential impacts on viewsheds and individual properties. Due to this uncertainty, the City recommends that these mitigation measures be revised to pertain only to solar energy equipment installations.

Response to Comment 1: We understand your concern on how wind turbines might impact viewsheds within the City of San Bernardino and while we believe that the mitigation as written protects viewsheds through City review of potential energy projects, given that the City will be implementing the mitigation measures the following minor text changes have been made to explicitly name solar equipment in the review. The mitigation in the Final EIR reads as follows (in redline/strikeout format):

MM4.17.1-1a ~~Renewable-Solar~~ energy generating facilities shall be placed or constructed below any major ridgeline when viewed from any designated scenic corridor as identified in the San Bernardino General Plan.

MM4.17.1-1b ~~Renewable-Solar~~ energy generating facilities shall not be:

- Located within middle and background scenic view sheds as identified in the General Plan
- Located in an area that would substantially obstruct views of adjacent property owners
- Allowed in areas where prohibited by the Alquist-Priolo Earthquake Fault Zoning Act, the terms of any easement, or the listing of the proposed site in the National Register of Historic Places or the California Register of Historical Resources, or on the City's Historic Inventory

MM4.17.1-1c ~~Renewable-Solar~~ energy generating facilities shall be limited to a height of 80 feet on parcels between one and 5 acres, and limited to a height of 100 feet on parcels greater than 5 acres.

- MM4.17.1-2a** *The minimum setback from any non-residential property line shall be equal to the ~~renewable-solar~~ energy system height.*
- MM4.17.1-2b** *The minimum setback of a commercial-scale ~~renewable-solar~~ energy system from any residential property line shall be at least 1,500 feet.*
- MM4.17.1-2c** *On open space, only one ~~renewable-solar~~ energy system unit per 10 acres shall be allowed. Units shall be installed with at least 240 feet separation from each other. If the units are to 50 feet in height, a maximum of two units may be installed for every 5 acres. For every additional 5 acres, one additional unit may be added not to exceed a maximum of five units and the separation between the units may be reduced to twice the height of the systems.*
- MM4.17.1-2d** *~~Renewable-Solar~~ energy generating facilities not incorporated into the building, or part of the parking structure, or considered an accessory structure to an existing residence shall be prohibited in urbanized residential neighborhoods.*
- MM4.17.1-2e** *Residential properties less than 5 acres shall be limited to one accessory ~~wind-solar~~ energy system that shall not exceed the height of the zone in which it is located.*
- MM4.17.1-2f** *Residential properties that are 5 acres and more shall be limited to two accessory ~~wind-solar~~ energy systems that shall not exceed the height of the zone in which it is located.*
- MM4.17.1-3a** *All proposed solar energy-generating structures shall be constructed utilizing non-reflective materials to the maximum extent feasible. If a reflective material is used, appropriate shielding shall be placed or the structure relocated to reduce the amount of visible glare. The City shall review all discretionary projects prior to issuance of building permits to ensure that appropriate shielding and placement of such structures are included in design plans.*
- MM4.17.1-3b** *All proposed solar energy-generating structures in open spaces areas shall not be lighted unless required by code or regulation.*

Because the City does not currently have development standards for wind turbines, wind turbines cannot be approved. Any future Development Code amendments allowing wind turbines will require CEQA review to determine the potential impacts to the environment.

With the changes to the mitigation measures as described above, impacts to aesthetics within the City remain less than significant. These minor changes to the wording of the mitigation measures do not constitute significant new information or change the level of significance in the Draft EIR analysis.

Comment 2: The City has adopted a new General Plan Land Use Map in February 2013. Therefore, please ensure the current General Plan Land Use Map is provided within Figure 4.17.10-2.

Response to Comment 2: The Draft EIR analyzed future development in year 2020 consistent with the current General Plan Land Uses. However, the Draft EIR inadvertently used an older General Plan Land Use Map as Figure 4.17.10-2. To correct this error in figures, the Final EIR will include the current General Plan Land Use Map as Figure 4.17.10-2.

3.2.2 Interested Parties

■ Center for Biological Diversity



CENTER for BIOLOGICAL DIVERSITY

December 19, 2013

Via email and U.S. mail

Steve Smith, Director of Planning
SANBAG Planning Department
1170 W. 3rd Street, 2nd Floor,
San Bernardino, CA 92410-1715
ssmith@sanbag.ca.gov

**Re: San Bernardino County Regional Greenhouse Gas Emissions Inventories
and Reduction Plan: Draft Environmental Impact Report**

Dear Mr. Smith:

The Center for Biological Diversity (the “Center”) submits the following comments concerning the Draft Environmental Impact Report (“DEIR”) prepared by the San Bernardino Association of Governments (“SANBAG”) for the San Bernardino County Regional Greenhouse Gas Emissions Inventories and Reduction Plan (the “Plan”). The Center is a non-profit environmental organization dedicated to the protection of imperiled species, their habitats, and the environment through science, policy, and environmental law. The Center has more than 625,000 members and online activists, including many members throughout Southern California and the Inland Empire.

At the outset, the Center respectfully requests that SANBAG extend the deadline for comments on the DEIR. The DEIR, like the Plan itself, is a lengthy and complex document spanning more than two dozen volumes and thousands of pages. As discussed below, the DEIR’s analysis encompasses a range of potential baselines and emissions reduction targets, along with dozens of emissions reduction measures that may or may not be adopted, to varying degrees, by 21 separate municipal jurisdictions. In the Center’s discussions with local community members and stakeholders it has become clear that preparing comprehensive, meaningful comments on this document has struck many as an overwhelming task. Accordingly, the Center requests that SANDAG allow an additional 60 days for comment on the DEIR, up to and including February 17, 2014. An extended comment period is necessary to ensure meaningful public participation in light of the complexity and length of the relevant documents.

In the meantime, the Center offers the following interim comments on several broad issues related to the DEIR’s compliance with the California Environmental Quality Act (“CEQA”), Public Resources Code section 21000 et seq., and the CEQA Guidelines, Title 14, California Code of Regulations, section 15000 et seq.

Alaska • Arizona • California • Florida • Minnesota • Nevada • New Mexico • New York • Oregon • Vermont • Washington, DC

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I. Legal Standards for Environmental Impact Reports

The Legislature enacted CEQA to “[e]nsure that the long-term protection of the environment shall be the guiding criterion in public decisions.” *No Oil, Inc. v. City of Los Angeles*, 13 Cal. 3d 68, 74 (1974). The Supreme Court has repeatedly held that CEQA must be interpreted to “afford the fullest possible protection to the environment.” *Wildlife Alive v. Chickering*, 18 Cal. 3d 190, 206 (1976) (quotation omitted).

An EIR is “the heart of CEQA.” *Laurel Heights Improvement Ass’n v. Regents of University of California*, 47 Cal. 3d 376, 392 (1988) (citations omitted). It serves as “an environmental ‘alarm bell’ whose purpose it is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return. The EIR is also intended to demonstrate to an apprehensive citizenry that the agency has, in fact, analyzed and considered the ecological implications of its action. Because the EIR must be certified or rejected by public officials, it is a document of accountability.” *Id.* (citations and internal quotations omitted).

If CEQA is “scrupulously followed,” the public will know the basis for the agency’s action and “being duly informed, can respond accordingly to action with which it disagrees.” *Id.* Accordingly, CEQA “protects not only the environment but also informed self-government.” *Id.* In contrast, where an EIR fails to fully and accurately inform decision-makers, and the public, of the environmental consequences of proposed actions, it does not satisfy the basic goals of the statute. *See* Pub. Res. Code § 21061.

II. The DEIR Does Not Satisfy CEQA’s Requirements

A. The DEIR Fails to Identify a Concrete, Legally Permissible and Scientifically Defensible “Baseline” for Assessment of the Plan’s Environmental Significance

It is well established that the purpose of an EIR is to provide public agency decision-makers and members of the public with an informational document that explains potentially significant environmental impacts and feasible mitigation measures. (Cal. Pub. Res. Code § 21002.1; Guidelines § 15121; *Carmel Valley View, Ltd. v. Board of Supervisors* (1976) 58 Cal.App.3d 817, 821-822.) In order to be useful, however, the EIR must accurately identify what significant impacts exist. “[T]he significance of a project’s impacts can be ascertained only if the agency first establishes the physical conditions against which those impacts are to be measured.” Michael H. Remy et al., *Guide to CEQA California Environmental Quality Act*, 198 (11th ed., Solano Press 2007). The idea is to compare “what will happen if the project is built with what will happen if the site is left alone.” (*Woodward Park Homeowners Assn, Inc. v. City of Fresno* (2007) 58 Cal.Rptr.3d 102, 119 (*Woodward Park*)).

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Identification of a “baseline” for environmental analysis—the benchmark against which a project’s impacts are measured and their significance determined—is critical to ensuring accurate and complete disclosure and mitigation of environmental effects. *See Communities for a Better Env’t v. S. Coast Air Quality Mgmt. Dist.*, 48 Cal. 4th 310, 315 (2010) (“To decide whether a given project’s environmental effects are likely to be significant, the agency must use some measure of the environment’s state absent the project, a measure sometimes referred to as the ‘baseline’ for environmental analysis.”) The “physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published . . . will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant.” CEQA Guidelines § 15125(a) (emphasis added); *see also id.*, § 15162.2(a) (agency normally should limit impact assessment to “changes in the existing physical conditions in the affected area as they exist at the time the notice of preparation is published”). Without “an adequate baseline description . . . analysis of impacts, mitigation measures and project alternatives becomes impossible.” *County of Amador v. El Dorado County Water Agency*, 76 Cal. App. 4th 931, 953 (1999). A long line of CEQA cases holds that existing physical conditions, not hypothetical projects or conditions, constitute the proper “baseline” for environmental analysis. *See, e.g., Sunnyvale West Neighborhood Ass’n v. City of Sunnyvale*, 190 Cal. App. 4th 1351 (2010); *Woodward Park Homeowners Ass’n v. City of Fresno*, 150 Cal. App. 4th 683 (2007); *Env’tl. Planning & Info. Council v. County of El Dorado*, 131 Cal. App. 3d 350 (1982).

3 Cont.

The DEIR does not identify a single, stable baseline for evaluation of the Project’s greenhouse gas emissions. Rather, the DEIR and Plan anticipate that participating cities will choose their own baselines (2008 inventoried emissions levels or 2020 “business as usual” projections) against which to propose greenhouse gas reduction goals. Specifically, 12 cities will employ a 2008 GHG emissions level as a baseline, whereas nine cities will employ 2020 “business as usual” (“BAU”) emissions baseline. DEIR 3-8. The EIR provides little to no analysis on the efficacy of the baselines chosen by the cities. While the Center is encouraged by some cities choosing to adopt a baseline linked to 2008 inventoried emissions, it is unclear and disappointing why not all cities choose to do so or not even recommended to do so by the EIR. Instead, the EIR simply analyzes the arbitrary and as discussed below, legally impermissible, baselines chosen by individual cities.

Moreover, individual city analyses in the DEIR do not articulate or consistently employ clear baselines. *Compare, e.g.,* DEIR at 4.14.7- (describing “baseline” as 2008 inventoried emissions) *with* 4.14.7-23, 26 (evaluating reduction goals against 2020 “business as usual” baseline). As a result, the DEIR is unable to offer any consistent analysis of the potential climate impacts of the overall Plan. Indeed, the DEIR’s failure to articulate a clear baseline for environmental analysis at the outset of review is contrary to CEQA. *See Save Our Peninsula Committee v. Bd. of Supervisors*, 87 Cal. App. 4th 99, 125 (2001).

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B. The “Business as Usual” Approach used for some Cities is Flawed and Legally Impressible

To the extent the DEIR relies on 2020 “business as usual” projections as a baseline for assessing the significance of greenhouse gas emissions under the Plan, it does so erroneously. Again, existing physical conditions in the project area are, with very limited exceptions, the baseline against which CEQA requires environmental effects to be measured. As described in the DEIR, the 2020 “business as usual” projection does not represent either existing physical conditions or a reasonable projection of future physical conditions.¹ Rather, it represents a set of hypothetical development assumptions predicated on an alternate future scenario in which none of the state, regional, and local laws requiring greenhouse gas reductions taking effect after 2008 exist. *See, e.g.*, Plan at ES-9, 2-14. The “business as usual” concept is imported from the Scoping Plan for the Global Warming Solutions Act (“AB 32”), which outlines a general strategy for California to meet AB 32’s target of reducing GHG emissions to 1990 levels by 2020. The Scoping Plan notes in passing that reaching this statewide goal “means cutting approximately 30 percent from business-as-usual emissions levels projected for 2020.” Scoping Plan at ES-1. However, the Scoping Plan provides no further detail or analysis on the relative expected reductions from existing and new land use development to meet AB 32’s overall emission reduction objectives.

4

This particular method of assessing the significance of GHG emissions has been criticized by numerous public agencies. For example, when the California Air Pollution Control Officers Association (CAPCOA) issued a “CEQA & Climate Change” white paper intended to serve as a resource to assist lead agencies in analyzing greenhouse gas impacts under CEQA, CAPCOA determined that significance analysis relying on reductions from project business-as-usual emissions, had “low” GHG emission reduction effectiveness and consistency with state emission reduction targets. (CAPCOA 2008). Similarly, the California Resources Agency cautioned against using the Scoping Plan’s “business as usual” objective to determine significance under CEQA in its Final Statement of Reasons. The Resources Agency specifically warned that “a comparison of the project against a ‘business as usual’ scenario as defined by [CARB] in the Scoping Plan . . . would confuse ‘business as usual’ projections used in [CARB’s] Scoping Plan with CEQA’s separate requirement of analyzing project effects in comparison to the environmental baseline.” *See* Resource Agency’s Final Statement of Reasons (available at http://ceres.ca.gov/ceqa/docs/Final_Statement_of_Reasons.pdf (last checked December 17, 2013).)

¹ The California Supreme Court recently held that lead agencies may forgo a comparison with existing physical conditions, and instead rely solely on a comparison with projected future *physical conditions*, only where the existing conditions comparison would be misleading or without any informational value. *See Neighbors for Smart Rail v. Exposition Metro Line Construction Authority*, 57 Cal. 4th 439, 445 (2013). Nothing in *Neighbors*, however, suggests a comparison with hypothetical future *projects* is ever permissible.

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Additionally, the Attorney General has argued that because the “business as usual” approach “would award emission reduction ‘points’ for undertaking mitigation measures that are already required by local or state law,” it results in “significant lost opportunities” to require meaningful mitigation. *See* Letter from California Attorney General to SJVACD re: Final Draft Staff Report on Greenhouse Gas Emissions Under CEQA at 1, 3 (Nov. 4, 2009). This consequence is evident in the GHG emission reduction analysis done for Rancho Cucamonga, which as described further below, anticipated reaching its reduction goals solely from state and county reduction measures. DEIR at 4.14–4.15. This outcome flies in the face of the findings in the Scoping Plan, which recognize that local governments “are essential partners” in achieving California’s emissions reduction goals, further highlighting the lack of legitimacy of the FEIS/R’s significance criteria. Scoping Plan at 26; *see also Californians for Alternatives to Toxics v. Dept. of Food & Agric.*, 136 Cal. App. 4th 1, 17 (2005) (compliance with existing environmental laws or regulations is not sufficient to support a finding that a project will not have significant environmental impacts).

4 Cont.

Aside from failing to ensure actual, meaningful reductions in GHG emissions, the EIR adoption of a BAU baseline for some cities is legally impermissible. Such significance analysis violates a fundamental tenet of CEQA, which requires that a project’s impacts should be compared to actual, existing pre-project conditions rather than to a hypothetical, illusory conditions. (*Communities for Better Environment v. South Coast Air Quality Management Dist.* (2010) 48 Cal.4th 310, 322 [*CBE*].) As CEQA case law makes clear, “[a]n EIR must focus on impacts to the existing environment, not hypothetical situations.” *Sunnyvale West Neighborhood Assn. v. City of Sunnyvale* (2010) 190 Cal.App.4th 1351, 1373; Guidelines § 15125(a) [existing physical conditions “normally constitute the baseline physical conditions by which a Lead Agency determines whether an impact is significant”].)

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The 2020 “business as usual” projection cannot legally occur, and thus cannot be considered an adequate proxy for either existing or future physical conditions—the conditions against which CEQA requires impacts to be evaluated. *See Save Our Peninsula Committee*, 87 Cal. App. 4th at 121 (“the impacts of the project must be measured against the ‘real conditions on the ground.’”). Any assessment of the Plan’s significance in relation to this baseline is therefore invalid as a matter of law.

6

Troublingly, this erroneous baseline appears to be embedded in at least some of the Plan’s reduction measures. For example, Measure PS-1 (GHG Performance Standard for New Development) suggests that a 29% below business as usual target, based on the San Joaquin Valley Air Pollution Control District’s recommended CEQA significance threshold, would be appropriate. As the Attorney General pointed out in comments on that threshold, however, comparison with hypothetical projects is legally inappropriate,

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and the threshold fails to reflect the need for new development to achieve greater emissions reductions.²

6 Cont.

Finally, the DEIR fails to provide an evidentiary basis—grounded in actual physical conditions—for its conclusion that the Plan will reduce greenhouse gas emissions to a less than significant level. Rather, the DEIR merely finds that the various goals proposed by participating cities, if implemented, will achieve reductions that are roughly consistent with AB 32. The goal of AB 32 is to reduce California greenhouse gas emissions to 1990 levels by 2020. Health & Saf. Code § 38550. Recent science, however, indicates that far steeper reductions are necessary to avoid the most significant impacts of climate change. Even to stabilize atmospheric CO₂ concentrations at 450 ppm and limit global average temperature increases to 2°C—a level at which devastating effects may still occur³—industrialized countries will have to reduce emissions by 25-40% below 1990 levels by 2020.⁴ Many scientists believe that avoiding the worst impacts of climate change will require reducing the concentration of CO₂ in the atmosphere to 350 ppm or below, which will require even steeper and more rapid reductions.⁵ The EIR must analyze the cumulative significance of the Project’s emissions in light of reductions needed to avoid contributing to these physical impacts, not just measure them against the AB 32 Scoping Plan and the state’s renewable generation goals.

7

C. The Emissions Reduction Measures Proposed in the Plan Are Vague, and the DEIR’s Assumptions Regarding their Effectiveness Are Unsupported

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Many of the greenhouse gas reduction measures proposed in the Plan lack specific, measurable and enforceable terms. As a result, it is not possible to evaluate their

² Timothy Sullivan, State of California Dept. of Justice, letter to Dave Warner, San Joaquin Valley Air Pollution Control District, Re: Final Draft Staff Report on Greenhouse Gas Emissions Under CEQA (Nov. 4, 2009)

³ Recognizing this fact, scientists and international climate negotiators have begun to explore pathways for limiting average global temperature increases to less than 1.5°C. See, e.g., J. Hansen, et al., *Assessing ‘‘Dangerous Climate Change’’: Required Reduction of Carbon Emissions to Protect Young People, Future Generations and Nature*, 8 PLOS ONE e81648 (Dec. 2013); see also M. Steinacher, *Allowable carbon emissions lowered by multiple climate targets*, 499 NATURE 197 (2013) (considering multiple climate mitigation goals results in lower allowable emissions than temperature target alone)

⁴ M. den Elzen & N. Höhne, *Reductions of greenhouse gas emissions in Annex I and non-Annex I countries for meeting concentration stabilisation targets*, 91 CLIMATIC CHANGE 249 (2008); see also United Nations Environment Programme, *The Emissions Gap Report 2013*, available at <http://www.unep.org/emissionsgapreport2013/> (describing remaining carbon budget and reductions necessary to preserve likely chance of keeping global temperature increase below 2°C).

⁵ J. Hansen, et al., *Target Atmospheric CO₂: Where Should Humanity Aim?*, 2 OPEN ATMOS. SCI. J. 217 (2008)

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environmental consequences or their effectiveness. For example, Measure PS-1 (GHG Performance Standard for New Development) requires developers to do no more than “quantify project-generated GHG emissions and adopt feasible reduction measures to reduce project emissions to a level that is a certain percent below BAU project emissions.” DEIR at 3-30. Neither a single quantitative target nor any specific reduction measures are specified. Accordingly, Measure PS-1 provides no basis for determining the significance of future development projects’ greenhouse gas emissions; this aspect of the Plan thus fails to satisfy the standards of CEQA Guidelines section 15183.5. Moreover, as discussed above, to the extent Measure PS-1 is intended to function at least in part as a threshold of significance, it relies on an impermissible hypothetical future baseline.

8 Cont.

Both the Plan and the DEIR assess individual cities’ greenhouse gas emissions by including “reductions” associated with compliance with state and county laws and plans. In some cases, this leads to potentially perverse results, the environmental consequences of which the DEIR fails to consider. For example, Rancho Cucamonga is expected to achieve well over 100% of its greenhouse gas reduction goals by virtue of state and county reductions. Although the city is expected to adopt Measure PS-1, reductions from compliance with this measure in approving new development are counted as zero. DEIR at 4.14-4.15. This could result in the city setting weak targets for emissions reductions from new development, or worse, approving inefficient and high-emitting new development projects based on the assumption that the city does not need to do anything at the local level and will achieve its greenhouse gas reduction targets no matter what. The DEIR fails to address this disincentive to ambitious, scientifically credible climate planning.

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Additionally many of the proposed reduction measure rely upon voluntary programs, with no specific benchmarks, standards or enforcement mechanisms to ensure compliance. DEIR 3.9-3.30. Many of the measures state only that energy efficiency mechanisms should be “incentivized” “encouraged” and “promoted” with little to no additional detail or specificity. See DEIR 3.10 (Energy 1: Promote Energy Efficiency for Existing Buildings) DEIR 3.11 (Energy 2: Outdoor Lighting) DEIR 3.14 (Onsite Solar Energy for New and Existing Warehouse Space). Nearly all of these voluntary reduction measures must be implement by individual city governments, who can choose varying levels of commitment to the measures ranging from aggressive, medium to low commitment. Therefore, cities can claim to be in compliance with the EIR and its reduction measures while in reality doing very little to reduce GHG emissions within their city.

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Finally, some of the DEIR’s assumptions regarding the effectiveness of mitigation measures are unsupported. For example, the DEIR counts all electricity generated pursuant to the state’s renewable portfolio standard (“RPS”) as carbon neutral. This is inaccurate. Nothing in the RPS statute requires or otherwise ensures that “renewable” generation also reduces greenhouse gas emissions. Biomass energy generation can increase atmospheric CO₂ concentrations for many decades even when used to replace

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fossil fuels.⁶ The DEIR cannot simply assume that compliance with the RPS will reduce greenhouse gas emissions. Instead, the DEIR must assess the relative emissions associated with the renewable generation mix in each jurisdiction.

11 Cont.

III. The DEIR Is Inadequate to Support “Tiering” of Later Environmental Analysis, Particularly for Specific Development Projects

According to the EIR, “[o]ne of the goals of the Regional Reduction Plan is to allow programmatic level review and mitigation of GHG emissions for the Participating Cities that allows for the streamlining of CEQA review for subsequent development projects within the Participating Cities that choose to implement the Regional Reduction Plan through the drafting and adoption of City-level ‘qualified CAPs or GHG Reduction Plans.’” DEIR 2-21. The project’s objectives go to state that the EIR is intended to “[p]rovide all the technical data needed for each Participating City to establish a CAP that fulfills all the quantifications 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.” DEIR 3-2. However, while the EIR does provide some data on potential impacts of implementing GHG emissions thresholds and adopting various mitigation measures on a city-by-city basis, it is inadequate as a tiering document and fails to meet the requirements of the Guidelines Sections 15183.5.

12

The Guidelines provide specific elements that should be included in a GHG reduction plan intended for use as a tiering document, in particular: (B) establish a level, based on substantial evidence, below which emissions would not be cumulatively considerable; (D) specific measures or a group of measures if implemented would collectively achieve the specified emissions level. Both of these criteria are vital to the tiering process and neither are fully met here. In its Final Statement of Reasons for CEQA Amendments addressing GHG emissions, the California Natural Resources Agency noted that “Criterion (B) establishes a benchmark to assist the lead agency in determining whether the plan provisions will avoid or substantially lessen cumulative effects of the area’s GHG emissions” and Criteria (D) is “necessary to demonstrate that the plan will actually avoid or substantially lessen the cumulative effects of those emissions.” Because the EIR lacks clarity on which reduction measures will actually be implemented by individual cities and fails to designate a clear baseline, the EIR falls far short of Guideline section 15183.5(b)(1) requirements.

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As an initial matter, the EIR isn’t clear about whether it’s intended to support tiering for later development projects, regardless of whether participating cities adopt some or all of the measures discussed in the EIR and Plan. Compare Plan at 1-2 (suggesting that “all projects in the region can tier off the EIR and be considered less than

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⁶ The Center’s recent comments to the California Air Resources Board concerning the draft 2013 AB 32 Scoping Plan Update addressed this issue at length and are included as an attachment.

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significant under CEQA if they show consistency with the regional reduction plan”) with 1-9, 3-4 (indicating tiering will be limited to development projects governed by later-adopted city-specific plans.)

Nonetheless, for either the purpose, the EIR is inadequate as a tiering document. With its lack of clarity on what reduction measures will actually be adopted by individual cities and lack of clarity on baselines or reduction target, the EIR fails to meet the standards of Guideline section 15183.5(b)(1). The EIR does not provide a clear baseline or threshold upon which emissions would not be cumulatively considerable for the County. Instead, as detailed above, the EIR allows each city to adopt their own baseline for measuring the significance of GHG emissions as well as their own reduction targets. This refusal to adopt a uniform approach allows for cities to vary significantly in their commitment to reduce GHG emissions. The BAU baselines and associated reduction targets are supported by little to no analysis and at times seem arbitrarily chosen. As a result, there remains a wide spectrum of reduction targets within the 21 cities that make up SANBAG, many of which are inadequate to meet AB 32 goals. This inconsistent approach and refusal to adopt a single, uniform baseline or threshold of significance violates criteria B of Guideline section 15183.5(b)(1).

14 Cont.

The EIR also fails to meet criterion (D) since it does not ensure that the adoption of the plan will actually avoid or substantially lessen the cumulative effects of the county’s GHG emissions. Although the EIR states they will no cumulative impacts from the Project in part because the targets adopted by the cities are in line with AB 32, that conclusion is unsupported since it remains unclear which reduction measures, if any, the cities will actually adopt and implement. DEIR 5-3. The lack of clarity on which reduction measures will actually be implemented by individual cities suggests that the cumulative impacts of this project are unknown at this time. Therefore, this EIR is inadequate as a tiering document for later development project because it fails to meet the criteria laid out in Guideline section 15183.5

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Lastly, if subsequent development projects wish to tier from this EIR, project applicants should note that “a decision to ‘tier’ environmental review does not excuse a governmental entity from complying with CEQA’s mandate to prepare, or cause to be prepared, an environmental impact report on any project that may have a significant effect on the environment, with that report to include a detailed statement setting forth ‘[a]ll significant effects on the environmental of the proposed project.’” Pub. Resources Code §21100; *Stanislaus Natural Heritage Project v. County of Stanislaus* (1996) 48 Cal. App. 4th 182, 197.

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IV. Conclusion

Thank you for your attention to these comments. Again, the Center respectfully requests that SANBAG extend the deadline by 60 days for comments on this lengthy and dense DEIR. An extended comment period would ensure meaningful public participation in light of the complexity and size of the relevant documents. However, in the interim,

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the Center would like to express its strong concerns with the vague, imprecise and inconsistent approach of this DEIR to an environmental baseline for significance and implementation of mitigation measures. As it is currently drafted, the DEIR fails to meet its own project objectives and fails to comply with the CEQA.

17 Cont.

The Center also wishes to be placed on the mailing list for all future notices regarding this project. Please mail all notices to the Center via email at aprabhala@biologicaldiversity.org or at the mailing address listed above. We look forward to working with SANBAG to assure that the DEIR conforms to the requirement of CEQA and provides a comprehensive, effective plan to reduce GHG emissions in San Bernardino County.

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Sincerely,



Aruna Prabhala, Staff Attorney
Kevin P. Bundy, Senior Attorney
Center for Biological Diversity

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Attachments

CAL. AIR RES. BD., SCOPING PLAN (2008).

Letter from California Attorney General to San Joaquin Valley Air Pollution Control District re: Final Draft Staff Report on Greenhouse Gas Emissions Under CEQA (2009).

CAPCOA, CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Project Subject to CEQA (2008).

California Natural Resource Agency's Final Statement of Reasons (2009).

J. Hansen, et al., *Assessing 'Dangerous Climate Change': Required Reduction of Carbon Emissions to Protect Young People, Future Generations and Nature*, 8 PLOS ONE e81648 (Dec. 2013); see also M. Steinacher, *Allowable carbon emissions lowered by multiple climate targets*, 499 NATURE 197 (2013).

M. den Elzen & N. Höhne, *Reductions of greenhouse gas emissions in Annex I and non-Annex I countries for meeting concentration stabilisation targets*, 91 CLIMATIC CHANGE 249 (2008).

J. Hansen, et al., *Target Atmospheric CO₂: Where Should Humanity Aim?*, 2 OPEN ATMOS. SCI. J. 217 (2008).

Center for Biological Diversity Comment on California Air Resources Board's Draft AB 32 Scoping Plan Update (2013)

■ Center for Biological Diversity

Response to Comments

SANBAG considers the Center for Biological Diversity an important stakeholder in the Project and appreciates the Center's concerns. It is unfortunate that the Center for Biological Diversity has elected to provide comments on the last day of the public comment period rather than participate in the public meetings provided over the last fourteen months. In particular, the Scoping Meeting for the Project held November 28, 2012, with notices for the meeting provided in the newspapers, on the SANBAG website, at the SANBAG offices and at the San Bernardino County Clerk of the Board. Or the public meetings held for the Project and the Draft EIR held on October 21, 2013, and again on December 19, 2013, with notices.

However, there are additional opportunities for the Center to participate in the Project as SANBAG provides GHG Reduction Measure Implementation and Monitoring Tools for the participating cities to use in drafting their own climate action plans using the technical data provided by SANBAG in the San Bernardino County Regional Greenhouse Gas Reduction Plan (Regional Reduction Plan). This next step of the Project includes stakeholder meetings that the Center can attend.

The following addresses the comments found in the Center for Biological Diversity comment letter:

Comment 1: The Center for Biological Diversity respectfully request that SANBAG extend the deadline for comments on the Draft EIR ...

Response to Comment 1: SANBAG was mindful of the lengthily nature of the Regional Reduction Plan and associated Draft EIR. In particular, the Regional Reduction Plan contained a lot of technical information including baseline 2008 GHG emission inventories, 2020 forecasts in GHG emissions, reduction targets, and reduction measures for each participating city needed to achieve the reduction targets. The Regional Reduction Plan was both lengthily and highly technical. Also, this project is a project of regional significance. For these reasons, SANBAG extended the minimum 45-day review period required by CEQA for projects of regional or statewide importance. In particular, SANBAG released the Regional Reduction Plan in June and allowed 180 days for review. The Draft EIR was released on October 21, 2013, and allowed 60 days for review of the environmental analysis contained within the Draft EIR. SANBAG released the Regional Reduction Plan in June to allow government agencies, stakeholders and the public sufficient time to review the plan prior to the public distribution of the Draft EIR. By releasing the Regional Reduction Plan in June, this allowed the public time to review and understand the information in the plan first rather than try and consume all the information in both the Regional Reduction Plan and the Draft EIR at the same time. In October, the Draft EIR was released and the review time was extended to 60 days. SANBAG provided sufficient time during the public review for stakeholders to review and provide comments as demonstrated by your lengthily comment letter and attachments.

Comment 2: Legal Standards for Environmental Impact Reports

Response to Comment 2: SANBAG agrees that CEQA ensures that the long-term protection of the environment is considered in public decisions. SANBAG also agrees that the public needs to know the

basis for the agency's action and being duly informed of the environmental consequences of the actions being taken. For these reasons, SANBAG engaged in the Project to provide a plan that reduces GHG emissions within the region. SANBAG is also encouraging the participating cities to complete a climate action plan and implement the reduction measures locally. The result of this project will begin to address the environmental consequences of climate change and provide additional environmental co-benefits of reduced air pollution; reduced vehicle miles traveled and reduced consumption of resources. The Draft EIR adequately analyzed the potential impacts of the Regional Reduction Plan. The Draft EIR provided analysis of potential impacts, and where the impacts may be significant (such as aesthetics, localized air toxic concentrations near rail, biological and cultural resources) provided programmatic level mitigation to reduce environmental impacts to less than significant. The Draft EIR also informed the public on how the project would benefit the environment by reducing GHG emissions and air pollution at a regional level as well as the potential environmental impacts and mitigation to reduce those impacts.

Comment 3: The Draft EIR fail to identify a concrete, legally permissible and scientifically defensible “baseline” for assessment of the Plan's Environmental Significance.

Response to Comment 3: The comment confuses baseline with forecasts and reduction targets, which are all necessary in GHG reduction planning and the CEQA analysis of these types of plans.

The baseline year used for the Regional Reduction Plan and the Draft EIR is 2008. This baseline was chosen to be consistent with the San Bernardino County GHG Reduction Plan, which the Regional Reduction Plan builds upon. The year 2008 was also the most current year that full technical data on GHG emissions was available for each of the participating cities at the time the GHG inventories were assembled for the Regional Reduction Plan. By having a consistent baseline year of 2008 for all the inventories of GHG emissions both within the unincorporated county areas and within each of the city boundaries, the Regional Reduction Plan was able to comprehensively assess GHG emissions within the region. The Draft EIR also provides a description of the 2008 baseline GHG inventories for the Participating Cities and how the baseline relates to target setting in Chapter 3, Section 3.4.2 (page 3-8, 3rd paragraph of the Draft EIR).

The year 2020 was chosen as the horizon year for the plan. This horizon year is meaningful in determining growth in GHG emissions over time based upon economic and population growth in determining new or increased emission sources within the region. The economic and population growth between 2008 and 2020 in the Regional Reduction Plan is based upon the growth rates in the Southern California Association of Governments (SCAG) 2012 Regional Transportation Plan (RTP). The 2008 baseline and this forecast in emissions fulfills the requirement of CEQA Guidelines § 15183.5(b)(1)(A) “Quantify greenhouse gas emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area.” Having a baseline 2008 GHG inventory of emissions and 2020 forecast of GHG emissions fulfills this requirement of CEQA. The year 2020 was chosen as the horizon year because it is consistent with the AB 32 GHG emissions reduction target (CARB 2008).

The Draft EIR provides an analysis of environmental impacts likely to occur in 2020 both with and without the Regional Reduction Plan using 2008 as the baseline in evaluating impacts. The Draft EIR also evaluates environmental impacts that are anticipated to occur due to the implementation of the

reduction measures within the Regional Reduction Plan using 2008 as a baseline. Therefore, the Regional Reduction Plan and the Draft EIR have a stable baseline (2008) by which impacts are assessed.

The 2020 business as usual (BAU) scenario is used both within the Regional Reduction Plan and the Draft EIR to assess potential environmental impacts resulting from GHG emissions if the Regional Reduction Plan is not implemented. The 2020 BAU sets the Project horizon year and assesses the quantity of GHG emissions that need to be reduced in order to achieve the reduction targets chosen by each participating city. Providing a 2020 BAU scenario within a GHG reduction plan follows established methodology and protocols. In particular, the Climate Change Scoping Plan pursuant to AB 32 (CARB 2008) uses a 2020 BAU in determining the amount of GHG emissions that need to be reduced statewide in order to achieve the reduction target of AB 32. Having a 2020 BAU scenario is also recommended in the guidance document “Forecasting Community-Wide Greenhouse Gas Emissions and Setting Reduction Targets” published by the Association of Environmental Professionals (AEP) in May 2012.

The comment also confuses target setting with baseline. As stated above, baseline is year 2008 and is consistent with the San Bernardino County GHG Reduction Plan. Target setting is used in determining the level of GHG emissions that need to be reduced by the plan in order to be successful and reduce impacts of GHG emissions to less than significant. Because the Regional Reduction Plan has a horizon year in assessing GHG emissions, target setting is also set upon a year. Target setting and the years used by each participating city in setting a target are described in detail in Section 3.4.2 of the Draft EIR (pages 3-7 through 3-9).

Comment 4: The Business as Usual (BAU) Approach used for some Cities is flawed and legally infeasible.

Response to Comment 4: Contrary to the comment, the Regional Reduction Plan and the Draft EIR do not rely on 2020 BAU as a baseline. As described in the response to comment 3, baseline for the Regional Reduction Plan and Draft EIR is 2008. The Draft EIR assesses environmental impacts that would occur using 2008 as a baseline and looking at what would occur if growth in emissions continued from that point forward to the horizon year of the plan (i.e. 2020 BAU) and what impacts would occur as a result of implementing the reduction measures within the Regional Reduction Plan using 2008 as the baseline. To repeat, the 2020 BAU as a horizon year of the Regional Reduction Plan is needed to fulfill CEQA Guidelines § 15183.5(b)(1)(A).

All climate action plans and GHG reduction plans have a 2020 BAU in assessing GHG emissions and determining the reduction measures needed to reduce GHG emissions down to the reduction target of these plans. The comment also confuses the CAPCOA, CARB and Resource Agency cautions concerning 2020 BAU.

Contrary to the assertion in the comment, providing a BAU in assessing the significance of GHG emissions has been accepted rather than criticized by public agencies including CAPCOA. The CAPCOA white paper titled CEQA and Climate Change (CAPCOA 2008) clearly allows for the use of a reduction target based on 2020 BAU. In particular, the CAPCOA document discusses a non-zero threshold for regional plans (Page 37 in Chapter 7-CEQA with Non-zero GHG Thresholds). In that discussion there is the following text describes how a general plan or regional plan can show compliance with AB 32: “Projection of 2020 emissions is complicated by the fact that CARB is expected to promulgate emission

reductions in the short term. Until explicit CARB regulations are in place, unmitigated GP [general plan or regional plan] 2020 emission inventories represent business as usual scenarios. EIRs for GPs [general plans] or RPs [regional plans] which demonstrate 2020 mitigated emissions are less than or equal to 1990 emissions are considered less than significant (CAPCOA 2008).”

Case law also authorizes the use of BAU in assessing the significance of GHG emissions—see *Citizens for Responsible Equitable Environmental Development v. City of Chula Vista* (2011) 197 Cal.App.4th 327. In that case, the court upheld the use of a percentage reduction from BAU based on AB 32 as a CEQA significance standard for GHG emissions and climate change.

The Regional Reduction Plan provides a 2020 BAU for each city and shows the reductions afforded State efforts through CARB regulations, and then provides regional and local reduction measures to achieve the reduction target. The reduction target for each of the cities is based upon various ways of approximating 1990 levels of emissions. This process clearly follows the CAPCOA process described above. Concerning reduction targets and the need to achieve 1990 levels of emissions by 2020, the reason why reduction targets are not set explicitly on a 1990 GHG inventory of emissions for each city is because 1990 GHG inventories were never documented and there is not sufficient data for year 1990 to accurately calculate a 1990 GHG inventory. In particular, traffic data and the vehicle fleet were never assessed for cities in 1990. This is also true of many other sectors within a GHG inventory including area source emissions and agricultural emissions. For these reasons, providing a 1990 GHG inventory as a reduction target is not feasible. However, several documents recommend ways of target setting. One of those documents, The Climate Change Scoping Plan pursuant to AB 32, “recommended a greenhouse gas reduction goal for local governments of 15 percent below today’s levels by 2020 to ensure that their municipal and community-wide emissions match the State’s reduction target (CARB 2008).” The majority of the cities within the Regional Reduction Plan have chosen 15 percent below the 2008 baseline levels by 2020 as a reduction target using CARB’s recommendation in the Climate Change Scoping Plan.

A second document that provides guidance to local governments on setting GHG reduction targets is the AEP document titled: “Forecasting Community-Wide Greenhouse Gas Emissions and Setting Reduction Targets (AEP, 2012).” In the AEP document a discussion is provided on how to set reduction targets based upon a future year BAU condition. In that document AEP recommends that “the plan needs to articulate precisely how it calculates future year BAU conditions and ensure that future year forecast is as realistic and precise as possible. AEP also recommends that if this approach is used “a target be selected which is consistent with AB 32 and which results in emissions less than current emissions as the minimum. Therefore, the forecasts for 2020 BAU needs to be founded in realistic growth projections and the reduction target needs to reduce emissions to a quantity less than the current emissions, which the Regional Reduction Plan does. The Regional Reduction Plan bases 2020 BAU on economic and population growth for each city provided by SCAG. These are the same growth forecasts used in the 2012 RTP with a sustainable communities strategy (SCS) for the region.

The comment uses the City of Rancho Cucamonga as an example of why using a 2020 BAU in determining significance “flies in the face of the findings in the Scoping Plan,” yet the City of Rancho Cucamonga used the CARB recommendations to local governments written in the Climate Change Scoping Plan pursuant to AB 32 (CARB 2008). In particular, the City of Rancho Cucamonga set a GHG reduction target of 15% below baseline (2008) GHG emissions by 2020. In providing a 2008 baseline,

and a 2020 as horizon year in determining impacts, and using a reduction target (i.e. 15% below baseline) in assessing the level of significance of GHG emissions, Rancho Cucamonga and the other 20 participating cities in the Regional Plan correctly evaluate GHG emissions according to CEQA Guidelines § 15183.5(b)(1)(A).

The San Bernardino County GHG Reduction Plan used a 2020 business as usual in determining the level of GHG emissions that would occur in the “unmitigated condition” (San Bernardino County 2011). The Attorney General’s Office in review of the San Bernardino County GHG Reduction Plan was satisfied with the analysis and the use of the 2020 unmitigated emission levels stating that this use was acceptable so long as the growth and emissions scenario used in predicting 2020 levels was based upon reasonable growth rates and sound science. The Resource Agency in the “Reasons for Regulatory Action, Amendments to the CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB97 (Resource Agency, 2009),” allows the use of 2020 BAU in determining levels of emissions that would occur in the absence of the plan.

For these reasons, the 2020 BAU is an effective horizon year for the Regional Reduction Plan and does not fall into the scenario warned against by CAPCOA, the Resource Agency, and the Attorney General’s Office.

Comment 5: The EIR adoption of a BAU baseline for some cities is legally impermissible.

Response to Comment 5: The baseline set in the EIR is 2008. The BAU scenario is used in assessing impacts that would occur at the horizon year of the Plan. Because the Regional Reduction Plan and associated EIR assesses GHG emissions and all other environmental impacts using 2008 as a baseline, the Regional Reduction Plan and EIR compares the project’s impacts to actual, existing pre-project conditions. There is nothing hypothetical or illusory in the conditions reviewed under the Regional Reduction Plan and EIR. Contrary to the comment 2020 BAU is not a proxy for existing conditions and as stated in the response to Comment 4, the 2020 BAU is the horizon year emission estimates based upon the economic and population growth for each city provided by SCAG. The level of growth forecasts used in the 2020 BAU is reasonable and foreseeable in assessing the projects horizon year and required by CEQA Guidelines § 15183.5(b)(1)(A) for GHG reduction plans.

Comment 6: Troublingly, this erroneous baseline [i.e. 2020 BAU] appears to be embedded in at least some of the Plan’s Reduction Measures.

Response to Comment 6: In assessing the GHG emission reductions afforded the reduction measures chosen by each of the participating cities, the Regional Reduction Plan provides an assessment of how much below the horizon year (2020 BAU), both in mass quantity (metric tons of carbon dioxide equivalents, or MT CO₂e) and percentage the reduction measure is anticipated to reduce emissions. This is true for all of the reduction measures including PS-1 (GHG Performance Standard). The author of the comment appears to be troubled by the fact that PS-1 reads similar to the GHG Threshold adopted by the San Joaquin Valley Air Pollution Control District (SJVAPCD). However, the percent reduction that new development needs to achieve (a 29% reduction in GHG emissions from new development) was based upon the Regional Reduction Plan’s set of GHG emission inventories and forecasts in emissions and not the SJVAPCD Thresholds. The fact that the Regional Reduction Plan and SJVAPCD came up with similar percent reductions for new development is reassuring that the Regional Plan is on track in

achieving the needed reductions to reach a less than significant level of emissions. While the Attorney General may have criticized the SJVAPCD Thresholds during the drafting and adoption of those thresholds by SJVAPCD back in 2009, the Attorney General did not challenge those thresholds. Attorneys representing the Attorney General’s office and County of San Bernardino staff met and discussed this very issue at length in the summer of 2011 because the County had a very similar requirement of new development reducing GHG emissions below BAU in the County’s GHG Reduction Plan (San Bernardino County, 2012) and after reviewing the GHG inventories, 2020 forecasts, and the math associated with the reduction measures was satisfied that the reductions are based upon reasonably foreseeable activities and emissions associated with those activities. The inventories, forecasts and emission reductions in the Regional Reduction Plan follow the same methodology as the San Bernardino County GHG Reduction Plan.

Comment 7: The Draft EIR fails to provide an evidentiary basis—grounded in actual physical conditions—for its conclusion that the Plan will reduce GHG emissions to less than significant.

Response to Comment 7: The Draft EIR evaluates GHG emissions using 2008 as a baseline looking forward to 2020 as the horizon year for the Regional Reduction Plan and sets GHG reduction targets following approved methodology found in the guidance document “Forecasting Community-Wide Greenhouse Gas Emissions and Setting Reduction Targets (AEP, 2012).” The Regional Reduction Plan by providing a set of inventories for 2008 (baseline) has the evidentiary basis grounded in actual physical conditions. Furthermore, the 2020 BAU is based upon reasonably anticipated growth using SCAG forecasts for each of the participating cities in determining the level of growth in GHG emission that will occur over the specified period of time provided within the plan. The GHG reduction targets used in determining the level at which GHG emissions may be less than significant are based upon the AB 32 reduction targets and use the recommended reduction goals for local governments found in the Climate Change Scoping Plan pursuant to AB 32. The Regional Plan and Draft EIR uses these reduction targets based upon AB 32 because the AB 32 reduction target is substantiated using climate science. The climate science used to substantiate AB 32 was gathered by the Climate Action Team (CAT) headed by the California Environmental Protection Agency (CalEPA) and produced a final report titled “Climate Action Team Report to Governor Schwarzenegger and the Legislature (March 2006) which laid out the dangers of climate change, the 2020 reduction target needed to address climate change, and the actions needed to realize the reduction target. This report and CAT update reports constitute the science and evidentiary findings substantiating the 2020 reduction target used in this Regional Reduction Plan.

Applying the AB 32 reduction targets in determining the level of GHG emissions that are less than significant in a CEQA analysis is not unique to SANBAG or this Draft EIR. Many air districts within the State provide guidance in evaluating air quality and GHG emission impacts in CEQA. Air Districts throughout the State that have explicit GHG Thresholds they recommend for CEQA analysis of land use planning and development projects have based these thresholds on the AB 32 reduction target.

For example, the Bay Area Air Quality Management District (BAAQMD) provided an analysis of GHG emissions for the land use sectors between 2004 and 2020 within the San Francisco Bay area. The analysis then predicted the anticipated GHG emissions reductions associated with statewide regulations that will affect the same land use sectors within the San Francisco Bay area. Finally, the analysis determined additional GHG reductions for the land use sectors that will be needed within the San

Francisco Bay area to achieve the AB 32 reduction target. The GHG emissions thresholds were then calculated based upon those additional reductions needed from local land use sector projects. The methodology used by BAAQMD in developing the GHG emissions thresholds.

Another example given in the comment is the San Joaquin Valley Air Pollution Control District (SJVAPCD). SJVAPCD provided GHG emission thresholds based upon the data in AB 32 Scoping Plan using the estimated reductions needed to reduce the 2020 BAU down to the AB 32 reduction target.

A third example is the San Luis Obispo County Air Pollution Control District (SLO County APCD) In the SLO County APCD document titled “GHG Thresholds and Supporting Evidence (SLO County APCD, 2012)”, the air district stated:

No single land use project could generate enough GHG emissions to noticeably change the global average temperature. Cumulative GHG emissions, however, contribute to global climate change and its significant adverse environmental impacts. Thus, the primary goal in adopting GHG significance thresholds, analytical methodologies, and mitigation measures is to ensure new land use development provides its fair share of the GHG reductions needed to address cumulative environmental impacts from those emissions (SLO County APCD, 2012).

In determining the “fair share of GHG reductions needed to address cumulative environmental impacts for those emissions” SLO County APCD also stated in this document that:

There are several types of thresholds that can be supported by substantial evidence and be consistent with existing California legislation and policy to reduce statewide GHG emissions. In determining which thresholds to recommend, staff studied numerous options, relying on reasonable, environmentally conservative assumptions on growth in the land use sector, predicted emissions reductions from statewide regulatory measures and resulting emissions inventories, and the effectiveness of GHG mitigation measures. Staff recommends setting GHG significance thresholds based on AB 32 GHG emission reduction goals after taking into account the emission reductions expected from the strategies outlined in ARB’s Scoping Plan. The GHG CEQA significance thresholds recommended in this document were based on substantial technical analysis and provide a quantitative and/or qualitative approach for GHG evaluation. Until AB 32 has been fully implemented in terms of adopted regulations, incentives, and programs, and until SB 375 required plans have been fully adopted, or the California Air Resources Board (ARB) adopts a recommended threshold, the APCD recommends that local agencies throughout SLO County apply the GHG thresholds set forth herein (SLO County APCD, 2012).

Other air districts throughout the state have adopted GHG significance thresholds based upon AB 32 in determining the level of GHG emissions that are less than significant for cumulative climate change impacts.

In addition the court has upheld using the AB 32 reduction target based on AB 32 as a significance threshold under CEQA for GHG emissions and climate change (*Citizens for Responsible Equitable Environmental Development v. City of Chula Vista* (2011) 197 Cal.App.4th 327).

However, the reduction target set by AB 32, is in turn consistent with the reduction targets in the International protocols (Kyoto Protocol) meant to address the cumulative impacts of GHG emissions. The following summarizes the international efforts:

In 1992, countries joined an international treaty, the United Nations Framework Convention on Climate Change, to cooperatively consider what they could do to limit average global temperature increases and

the resulting climate change, and to cope with whatever impacts were, by then, inevitable. By 1995, countries realized that emission reductions provisions in the Convention were inadequate. They launched negotiations to strengthen the global response to climate change, and, two years later, adopted the Kyoto Protocol. The Kyoto Protocol legally binds developed countries to emission reduction targets. The Protocol's first commitment period started in 2008 and ended in 2012. The second commitment period began on 1 January 2013 and will end in 2020. There are now 195 Parties to the Convention and 192 Parties to the Kyoto Protocol. The UNFCCC secretariat supports all institutions involved in the international climate change negotiations, particularly the Conference of the Parties (COP), the Conference of the Parties serving as the meeting of the Parties (CMP), the subsidiary bodies (which advise the COP/CMP), and the COP/CMP Bureau (which deals mainly with procedural and organizational issues arising from the COP/CMP and also has technical functions). Climate change is a complex problem, which, although environmental in nature, has consequences for all spheres of existence on our planet. It either impacts on—or is impacted by—global issues, including poverty, economic development, population growth, sustainable development and resource management. It is not surprising, then, that solutions come from all disciplines and fields of research and development. At the very heart of the response to climate change, however, lies the need to reduce emissions. In 2010, governments agreed that emissions need to be reduced so that global temperature increases are limited to below 2 degrees Celsius.

The Kyoto Protocol has set an initial reduction target of reducing GHG emissions by the signatory nations down to 1990 levels by 2020 in order to address the cumulative impacts of those emissions. California, by setting an identical target as that in the Kyoto Protocol, is addressing the cumulative impacts of GHG emissions.

SANBAG by providing AB 32 compliant reduction targets within the Regional Reduction Plan is addressing locally within the San Bernardino County region the cumulative impacts associated with GHG emissions. There is continued debate among scientists to what level GHG emissions need to be reduced in order to reduce the impacts to acceptable levels. However, the consensus of the majority of scientists and air districts within California that reduction targets based upon AB 32 provides an evidentiary basis for Reduction Targets. CEQA does not require 100% consensus by all scientists is setting thresholds, rather CEQA requires lead agencies to provide a sound basis in determining the level of significance. By basing the reduction targets on AB 32, which in turn is based upon the international efforts to reduce GHG emissions, the Regional Reduction Plan provides a basis, supported by substantial evidence, for analyzing the cumulative impacts of GHG emissions and determining that the GHG emissions as reduced by the Plan are less than significant under CEQA..

Note also that the Kyoto Protocol, the State through Executive Order S-3-05, and the Regional Reduction Plan all acknowledge the need to continue reducing emissions beyond year 2020. The horizon year for the Regional Reduction Plan is 2020, but the need to continue reducing GHG emissions post-2020 is reviewed in Chapter 5, Section 5.2.3.4 of the Regional Reduction Plan. The Regional Reduction Plan states that:

Beginning in Phase 3 (2018), it is recommended that the Partnership cities and SANBAG commence planning for the post-2020 period. At this point, the Partnership cities would have implemented the first two phases of their local CAPs and would have a better understanding of the effectiveness and efficiency of different reduction strategies and approaches. The new post-2020 reduction plan should

include a specific target for GHG reductions for at least 2030 and if supported by long-term planning at the state level, should also include preliminary planning for 2040 and 2050. The targets should be consistent with broader state and federal reduction targets and with the scientific understanding of the reductions needed by 2050. It is recommended that partnership cities adopt the post-2020 reduction plan by January 1, 2020, which would require cities to start a new inventory/assessment process by 2017 or 2018 at the latest. Partnership cities can do their part to be on track through 2030 to meet the 2050 goal by implementing the following.

- Increase energy efficiency and green building efforts (for city municipal buildings as well as private buildings in the region) so that the savings achieved in the 2020 to 2030 timeframe are approximately 69% those accomplished in 2020.
- Continue to implement land use and transportation measures to lower VMT and shift travel modes (assumed improvement of 8% compared to the unmitigated condition, which is within SCAG's assumed range of 8% to 12% of GHG reductions for 2035).
- Capture more methane from landfills receiving regional waste, move beyond 75% local waste diversion goal for 2020, and utilize landfill gas further as an energy source.
- Continue to improve local water efficiency and conservation.
- Continue to support and leverage incentive and rebate and other financing programs for residential and commercial energy efficiency and renewable energy installations to shorten payback period and costs and to develop programs that encourage increased use of small-scale renewable power as it becomes more economically feasible.

The conceptual effects of these strategies would represent an approximate doubling of effort for most cities from that planned at the state and city level for 2020 (SANBAG 2013).

This phased approach to GHG reductions, having detailed reduction measures to achieve the 2020 reduction targets with broader post-2020 planning of additional reductions post-2020 at a more programmatic level, is needed to achieve the ultimate goal of addressing climate change long term and is essentially identical to the phased approach used in the Kyoto Protocol.

Comment 8: The emission reductions proposed in the plan are Vague, and the Draft EIR's assumptions regarding effectiveness are unsupported.

Response to Comment 8: The reduction measures are not vague in the Regional Reduction Plan. The quantity of reductions resulting from each reduction measure is quantified using the methodology provided for quantifying GHG emissions reductions found in the CAPCOA document titled "Quantifying Greenhouse Gas Mitigation Measures (CAPCOA 2010)." The quantification of each reduction measure including Measure PS-1 was based upon the expected participation in the reduction measure. As an example, PS-1 is a performance standard that requires that all new development need to provide a 29 percent reduction of GHG emissions as compared to the energy intensity of buildings and development using the regulatory energy efficiency requirements of buildings during the baseline year (2008). Because the plan has a horizon year of 2020 this constitutes a 2020 BAU as compared to baseline. The level of participation in PS-1 is based upon the expected growth in the participating city and new development that will occur due to that growth. Nothing is vague in the calculations of anticipated reductions or requirements of new development implementing PS-1. In Chapter 4 (page 4-31) the Regional Reduction Plan describes PS-1 as follows:

The PS [GHG Performance Standard] would be a reduction standard for new private developments as part of the discretionary approval process under CEQA. Under the PS, new projects would be required to quantify project-generated GHG emissions and adopt feasible reduction measures to reduce project emissions to a level that is a certain percent below BAU project emissions. The PS does

not require project applicants to implement a pre-determined set of measures. Rather, project applicants are allowed to choose the most appropriate measures for achieving the percent reduction goal, while taking into consideration cost, environmental or economic benefits, schedule, and other project requirements. One potential PS reduction goal could be 29%, based on San Joaquin Air Pollution Control District's recommended CEQA significance threshold and based on the calculations of reductions necessary at the state level to meet AB 32 at the time of the Scoping Plan (29% below forecasted 2020 levels = 1990 levels based on data available at that time).

Since the public release of the draft Regional Reduction Plan in June 2013 SANBAG has continued to develop additional details on quantifying reductions during implementation of PS-1, The following description provides additional details on how PS-1 quantifies reductions and how to achieve a fair share reduction requirement from private new development: All new development projects subject to discretionary approval by the Participating Cities as Lead Agencies within their jurisdictions would be required to demonstrate compliance with PS-1 through a menu of options called "Screening Tables." The purpose of these Screening Tables is to provide quantitative reduction values of GHG emissions attributable to certain design and construction measures incorporated into development projects. The Screening Table assigns points for each option incorporated into a project as mitigation or a project design feature (collectively referred to as "feature"). The point values correspond to the minimum emissions reduction expected from each feature. The menu of features allows maximum flexibility and options for how development projects can implement the GHG reduction measures. Projects that garner at least 100 points will be consistent with the reduction quantities anticipated in the Regional Reduction Plan. The 100 point allocation within the Screening Tables for each Participating City was determined by taking the GHG reductions expected from PS-1 for that City as shown in Tables 4.1-4 through 4.21-4 and proportioning the GHG emissions reduction by the incremental growth in new residential units or square feet of commercial/industrial uses. This was accomplished by taking the predicted growth in households and commercial uses in 2020 for each Participating City and proportioning the appropriate reduction quantities for new development to the residential, commercial, and industrial land use sectors within the Screening Table. The result is a fair share allocation of GHG emission reductions within each Participating City that are proportioned by residential unit or commercial/industrial square feet. Because of this, the size of the project is not relevant to the Screening Table. Regardless of size, each project needs to garnish 100 points to demonstrate consistency with the Regional Reduction Plan. Efficiency, not size of the project, is critical. Points attributed to each of the "features" within the menu of options were derived using the methodology and calculations for GHG emission mitigation found in the CAPCOA document titled "Quantifying Greenhouse Gas Mitigation Measures (CAPCOA, 2010).

In order to provide additional details on how PS-1 achieves the expected GHG reductions the description above is added to the Regional Reduction Plan and associated EIR Project Description. (Also see response to Comment 1 in the Building Industry Legal Defense Council Comment Letter for additional information on PS-1)

Concerning reduction measures focused on existing buildings (Energy 1, Energy 7, and Energy 8) in the Regional Reduction Plan, the level of participation and effectiveness is based upon the past record of participation in PACE programs used to retrofit existing homes and businesses, Levels of participation of PACE programs including the Western Riverside County Associated Government (WRCOG) HERO program where used in determining the predicted participation in Energy 1, Energy 7, and Energy 8 within the Regional Reduction Plan.

Comment 9: Both the Plan and the Draft EIR assess individual cities' GHG emissions by including reductions associated with compliance with state and county laws and plans.

Response to Comment 9: Consistent with the recommendations found in the AEP guidance “Forecasting Community-Wide Greenhouse Gas Emissions and Setting Reduction Targets (AEP 2012),” the Regional Reduction Plan assesses the amount of GHG emissions each participating city needs to reduce by first calculating the GHG emissions reductions expected of state regulations and county-wide reduction measures. Following the established methodology, the Regional Reduction Plan then calculates the additional reductions needed within each city to achieve the reduction target. The Regional Reduction Plan then provides specific local reduction measures for each city to implement. Note that all the participating cities within the Regional Reduction Plan, including Rancho Cucamonga, have local reduction measures to implement. Because Rancho Cucamonga is primarily built out and has modest population and economic growth rates does not require substantial local GHG reduction measures. However, Rancho Cucamonga has committed to locally reducing 61,949 MT CO₂e through the following locally implemented reduction measures:

- Energy-1: Energy Efficiency retrofits of existing buildings
- Energy-4: Solar installation for new housing
- Energy-5: Solar installation for new commercial
- Energy-6: Solar energy for warehouse space
- Energy-7: Solar installation of existing housing
- Energy-8: Solar installation of existing commercial/industrial land uses
- Land Use-1: Local reductions associated with urban forest tree planting
- Wastewater-2: Equipment upgrades that reduce electric consumption
- Water-1: Make mandatory the Tier 1 CALGreen Voluntary Standards for new development
- Transportation-1: Local implementation of the Sustainable Communities Strategy (SCS).
- Transportation-2: Local implementation of smart bus technologies
- Water-3 Water efficient landscaping practices

Local implementation of the reduction measures listed above provides a total of 61,949 MT CO₂e in GHG reductions per year. In addition, the City of Rancho Cucamonga will implement PS-1, the GHG Performance Standard. However, this commitment was made after quantification was completed for the Regional Reduction Plan. While PS-1 is anticipated to provide additional reductions in GHG emissions from new development, the exact quantity for Rancho Cucamonga was not calculated at the time the Regional Reduction Plan and Draft EIR were publicly distributed. Even so, the quantified emissions reductions from the list of reduction measures demonstrates that Rancho Cucamonga and all the other participating cities have committed to locally implementing significant GHG reductions within each city. Contrary to the comment, the Draft EIR shows the initiative that each city has taken in locally addressing GHG emissions.

Comment 10: Many of the proposed reduction measure[s] rely upon voluntary programs with no specific benchmarks, standards or enforcement mechanisms to ensure compliance.

Response to Comment 10: The Regional Reduction Plan provides four reduction measures (Energy-1, Energy-2, Energy-7, and Energy-8) associated with the retrofit of existing buildings and existing outdoor lighting in parking lots and other areas out of a total of local twenty-six reduction measures within the plan. Because participating cities cannot make requirements of existing land owners concerning their buildings and facilities without some type of expansion or change of use associated with that existing building, the Regional Reduction Plan relies upon incentives to land owners to provide energy efficiency retrofits and solar installation on existing buildings. The mechanism used to implement Energy-1, Energy-7, and Energy-8 is the HERO financing program and the level of anticipated participation in this program is based upon past participation of this program in Western Riverside County and similar Southern California Edison energy retrofit programs.

Therefore, while Energy-1, Energy 2, Energy -7, and Energy-8 must remain a voluntary, incentive based program for implementation, the level of participation used in the Regional Reduction Plan and Draft EIR is conservatively based upon past participation in similar programs. Note also, that while the Regional Reduction Plan may have an incentive based voluntary program to implement three of the twenty-six reduction measures, there remains a significant commitment toward mandatory programs as well.

Comment 11: The Draft EIR's assumptions regarding the effectiveness of mitigation measures are unsupported.

Response to Comment 11: One point of clarification; the Project under evaluation in the Draft EIR is a plan for the regional reduction of GHG emissions. As such the GHG reduction measures chosen by each city in the Regional Reduction Plan are an integral part of the Project, not mitigation in the Draft EIR. Mitigation in the Draft EIR reduces environmental impacts associated with implementing the Regional Reduction Plan (i.e. implementing the reduction measures). Based upon the arguments in this comment, we have inferred that when the comment states "mitigation." In fact, the comment is discussing the GHG reduction measures in the Regional Reduction Plan and not mitigation measures in the Draft EIR.

The assumptions in the Regional Reduction Plan and Draft EIR regarding the effectiveness of reduction measures are based upon supportive evidence in the calculations of GHG emissions. The GHG emission reduction calculations use the methodology found in the CAPCOA document titled "Quantifying Greenhouse Gas Mitigation Measures (CAPCOA 2010)." The calculations of GHG reductions associated with the renewable portfolio standard (RPS) requirements for electric power serving the SANBAG area took into account GHG emissions associated with electric generation using biomass as a fuel. As documented in the latest report "SCE Renewable Portfolio Standard Project Development Status Report (CEC 2013) biomass comprises less than 1 percent (0.77 percent) of the total RPS generation. Most of the RPS generation (over 99 percent) is produced by solar, wind, hydroelectric, and geothermal generation. Accounting for biomass, the RPS generates 5.51 pounds (0.0025 MTCO₂e) per megawatt in GHG emissions. That is an exceedingly small amount of emissions that replaces fossil fuel generation that emits 1,388.52 pounds (0.63 MTCO₂e) per megawatt. The amount is so small that

emissions associated with biomass within the RPS are within the rounding error of the GHG emissions inventories within the Regional Reduction Plan. The Regional Reduction Plan and Draft EIR show that compliance with the RPS will reduce GHG emissions because of the calculations used in determining the reductions and how the RPS replaces fossil fuel generation. These calculations are not based on simple assumptions of what the RPS replaces, but rather, records provided by the utilities in how each utility is fulfilling the RPS goal.

Comment 12: The Draft EIR is inadequate to support “tiering” of later environmental analysis. Particularly for specific new development projects.

Response to Comment 12: A goal of the Regional Reduction Plan is to provide the technical information needed for participating cities to implement a climate action plan that fulfills CEQA Guidelines § 15183.5(b), which will allow cities that adopt a climate action plan (CAP) to use their adopted plan to tier and streamline the CEQA analysis of GHG emissions. The Regional Reduction Plan provides the following components required in CEQA Guidelines § 15183.5(b):

- The Regional Plan quantifies GHG emissions, both for existing (2008) baseline and over a specified time period (2020), resulting from activities within a defined geographic area (each city) which fulfills § 15183.5(b)(1)(A) of the CEQA Guidelines.
- The Regional Plan provides reduction targets for each city that establishes a level, based on substantial evidence, below which the contribution to GHG emissions from activities covered by the plan would not be cumulatively considerable, which fulfills § 15183.5(b)(1)(B) of the CEQA Guidelines.
- The Regional Plan provides analysis of GHG emissions resulting from categories of actions by land use type and emissions sector anticipated within each city based upon population and economic growth within each city fulfilling § 15183.5(b)(1)(C) of the CEQA Guidelines.
- The Regional Plan provides specific reduction measures for each city including performance standards and calculates the predicted reductions in GHG emissions these measures will reduce using established protocols and methodologies and reasonable assumptions on participation in the reduction measures, all of which is considered substantial evidence demonstrating that once implemented on a project level would collectively achieve the specified emissions level fulfilling 15183.5(b)(1)(D) of the CEQA Guidelines.
- The Regional Plan is being adopted in a public process following CEQA review in the Draft EIR which fulfills 15183.5(b)(1)(F) of the CEQA Guidelines.

Each participating city that desires to complete a climate action plan fulfilling the remainder of the requirements in CEQA Guidelines § 15183.5(b)(1) needs to provide an implementation chapter explaining how the reduction measures will be implemented within that city and provide a monitoring program that monitors progress of the plan. The monitoring program will include periodic updates of the plan to keep it on track toward achieving the reduction target. The EIR is intended to provide the required CEQA environmental review for climate action plans adopted by individual cities. However, once a city drafts a climate action plan, the city will need to review the draft plan to determine if additional CEQA review is warranted and provide such review, if required, prior to adopting the plan.

As described above, the Regional Reduction Plan provides the technical data needed for each city to develop a climate action plan that once adopted can provide the programmatic tiering of GHG analyses within their city afforded under CEQA Guidelines § 15183.5(b)(1) if that city includes an implementation chapter that includes a monitoring program in fulfillment of § 15183.5(b)(1)(E) of the Guidelines.

Comment 13: The Guidelines provide specific elements that should be included in a GHG reduction plan intended for use as a tiering document.

Response to Comment 13: As described in the response to Comment 12, the Regional Reduction Plan provides the technical information needed by participating cities in the development of a qualified climate action plan. Contrary to the comment the Regional Reduction Plan provides a consistent baseline year (2008), a distinct set of reduction measures for each city to implement, and quantified analysis of GHG emissions demonstrating that the reduction measures reduce GHG emissions within each city to the reduction target for each city.

Comment 14: The EIR is not clear about whether it's intended to support tiering for later development projects.

Response to Comment 14: See the response to Comments 12 and 13.

Comment 15: The EIR also fails to meet criterion (D) since it does not ensure that the adoption of the plan will actually avoid or substantially lessens cumulative effects of the County's GHG emissions.

Response to Comment 15: The Regional Plan provides specific reduction measures for each city including performance standards and calculates the predicted reductions in GHG emissions these measures will reduce using established protocols and methodologies and reasonable assumptions on participation in the reduction measures, all of which is considered substantial evidence demonstrating that once implemented on a project level would collectively achieve the specified emissions level fulfilling 15183.5(b)(1)(D) of the CEQA Guidelines (Also see response to Comment 8 concerning details on the PS-1 reduction measure, and response to Comment 10 on voluntary measures).

Comment 16: Lastly, if subsequent development projects wish to tier from this EIR, project applicants should note that “a decision to “tier’ environmental review does not excuse a government entity from complying with CEQA’s mandate to prepare, or cause to be prepared, and environmental impact report on any project that may have significant effect on the environment.

Response to Comment 16: Participating cities desiring to complete a climate action plan using the technical data in the Regional Reduction Plan and the environmental analysis of impacts found in the Draft EIR need to provide an implementation chapter documenting the local process used in that city to implement the reduction measures, monitor progress of the plan, and provide periodic updates of the plan to ensure achievement of the reduction target. Once that implementation chapter is complete, then that city can adopt a climate action plan and use it to tier GHG analysis within their city. As the comment states, this ability to tier the analysis of GHG emissions for projects within a city does not excuse the need to comply with CEQA on other environmental issues which may require an environmental impact report or other CEQA document for individual projects. Once adopted a qualified

climate action plan allows tiering of GHG emissions analysis in CEQA. It does not alleviate a lead agency from analyzing other environmental impacts under CEQA.

Comment 17: Thank you for your attention to these comments. Again the Center respectfully requests that SANBAG extend the deadline by 60 days for comments on this lengthily and dense Draft EIR ... the Center would like to express strong concerns with the vague, imprecise and inconsistent approach of this Draft EIR to an environmental baseline for significance and implementation of mitigation measures ...

Response to Comment 17: This comment is summary of comments provided in the letter. Please see above responses to comments for substantive response. See the response to Comment 1 in reply to extending the comment period.

Comment 18: The Center also wishes to be placed on the mailing list for all future notices regarding this project. Please mail all notices to the Center via email at aprabhala@biologicaldiversity.org or at the mailing address listed above ...

Response to Comment 18: SANBAG has placed the Center for Biological Diversity on the mailing list for all notices regarding this Project. We look forward to working with such an energetic stakeholder in this important Project.

In conclusion, SANBAG considers the Center for Biological Diversity a stakeholder in the project and appreciates the concerns the Center for Biological Diversity has concerning the project. It is unfortunate that the Center for Biological Diversity did not participate in any of the public meetings for the Project provided to date including public meetings held in November 2012, November 2013 and December 2013. However, there are additional opportunities for the Center for Biological Diversity to participate in the upcoming phase of the project and SANBAG invites representatives of the Center for Biological Diversity to participate in the Stakeholder Meetings that will occur in the spring of 2014.

■ Building Industry Legal Defense Council



Building Industry Legal Defense Foundation

November 15, 2013

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GENERAL COUNSEL
Andrew R. Henderson, Esq.

Re: Concerning the Proposed Climate Action Plan Elements that
SANBAG is Helping to Coordinate.

Hon. President Jahn,

Building Industry Legal Defense Foundation (“BILD”) is the legal
affiliate of Building Industry Association of Southern California, Inc.
 (“BIASC”). Accordingly, BILD monitors legal and regulatory issues
throughout the six-county region that BIASC serves.

BIASC’s Baldy View Chapter’s government affairs team has been
monitoring SANBAG’s recent steps to coordinate the development of climate
action plans for consideration by the cities that are constituents of SANBAG.
As a consequence of that monitoring, BILD became aware of the fact that
some of the cities, such as the City of Chino, have proposed and either are or
were considering climate action plans in which they might mandate that
residential homebuilders surpass by Title 24 energy efficiency standards (a
“Title 24 Departure”). Any such proposal is problematic for several reasons,
as this letter explains.

First, Title 24 Departure mandates would yield very little GHG-reduction
benefit; but it obviously has a substantial cost in terms of burdening the
builders who must surpass compliance with Title 24. For example, the City of
Chino’s originally proposed draft climate action plan that would have
mandated a 3% Title 24 Departure. Based on the City of Chino’s own
disclosures, its Title 24 Departure mandate was projected to save only 286
MTCO₂e out of total projected reductions of 192,601 MTCO₂e, each measured
from its 2008 baseline. (See City of Chino’s originally-proposed Draft
Climate Action Plan, Table 3, at 19.) Thus, only .148% of the City’s total
projected 2020 emissions reductions would have come from its originally-
proposed Title 24 Departure mandate. This is plainly a *de minimis*
environmental benefit, and one that can easily be achieved by many other
means.

Also, specifically in the case of the City of Chino, it is clear that the City
would not need the Title 24 Departure in order to meet its Assembly Bill 32
(AB 32) goals. Specifically, AB 32 seeks to return the state’s generation of
greenhouse gases (GHGs) to 1990 levels by the year 2020, notwithstanding
California’s intervening population growth.

5President Bill Jahn, SANBAG
November 14, 2013
Page 2

For climate action planning purposes, cities and counties generally satisfy their respective shares of AB 32 targets in one of two ways: by either reducing total annual GHG emissions in 2020 to 15% below a 2008 baseline year, or reducing total annual GHG emissions in 2020 to 29% (roughly) below a 2020 “business as usual” projection. The City of Chino has chosen the former option -- reducing total annual GHG emissions in 2020 to at least 15% below a 2008 baseline year.

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Thus, the City of Chino needed only to reduce emissions from their 2008 level of 1,031,892 MTCO₂e to projected 2020 emissions of 877,108 MTCO₂e (which is 85% of the 2008 emissions). The City’s Draft Climate Action Plan projects going far below a 2020 target based on 85% of the 2008 baseline, however. The City projects that it will achieve 2020 GHG emissions of 839,291 MTCO₂e – which is an 18.7% reduction from 2008 (rather than the target-based reduction of 15%). See Chino’s DCAP, Table 3, at 19. It therefore would be unnecessary for the City of Chino to impose any Title 24 Departure mandate as part of its new climate action plan. Simply put, its originally-proposed Title 24 Departure mandate would have been a burden gratuitously foisted on homebuilders by the City of Chino. To the extent that other cities are contemplating similar mandates, they would be similarly unjustified.

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Third, in addition to the lack of both any meaningful environmental benefit and any burning need for a Title 24 Departure mandate, there is an important legal obstacle standing in the way. California Public Resources Code section 25402.1(h)(2) requires that any local government must justify to the California Energy Commission (“CEC”) any departure from Title 24. Specifically, a local Title 24 departure may be enacted only if the city or county in question were to submit to the CEC both an energy efficiency analysis (which the CEC may or may not approve) and an accompanying cost-benefit analysis. If a local jurisdiction has not, then any Title 24 Departure that it may be contemplating should be forgone on grounds of legal infeasibility. Indeed, any city working with SANBAG must forgo any imposition of a Title 24 Departure mandate if it has not complied and will not comply with California Public Resources Code section 25402.1(h)(2).

5

Moreover, again in the case of the City of Chino, it appears that the City’s Title 24 Departure mandate could not have possibly coexisted with Calif. Public Resources Code section 25402.1(h)(2), because – as it was originally proposed – it would have mandated departures made in relation to future Title 24 standards, which are not yet determined by the California Energy Commission (the “CEC”). The CEC re-determines Title 24 standards every several years. Therefore, the City of Chino could not possibly analyze either the energy efficiency impacts of such future Title 24 Departure mandate or the resulting cost-benefit relationships applicable to a future Title 24 Departure mandate. Yet the City of Chino was prognosticating that the next Title 24 iteration would be 17%

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more stringent than the most recent iteration. Respectfully, BILD, BIASC and its Baldy View Chapter submit that local jurisdictions must await the development of future Title 24 iterations. They will be developed with an informed eye toward practical experience and costs in the meanwhile. Local governments should await those results.

6 Cont.

Given all of this, BILD, BIASC and BIASC's Baldy View Chapter respectfully ask SANBAG to inform its constituent cities of the need to forgo Title 24 Departure mandates from their respective climate action plans, especially insofar as the constituent cities have not complied with Calif. Public Resources Code section 25402.1(h)(2).

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Forgoing such a problematic element of proposed climate action plans will allow builders to avoid undertaking wasteful project analysis for very little environmental benefit. It will also allow the cities' building department inspectors to focus sensibly on compliance with evolving Title 24 requirements without any additional burdens of understanding how to ascertain and enforce mandated Title 24 Departures.

Our staff from BIASC's Baldy View Chapter will likely be raising these concerns in the proper forums and meetings. In addition, however, we respectfully ask that a written response from SANBAG concerning this issue be sent to BIASC's Baldy View Chapter, specifically to the attention of Carlos Rodriguez. Thank you very much for your consideration of these comments.

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Sincerely,



Andrew R. Henderson
General Counsel
Building Industry Legal Defense Foundation

cc (via email):

Dr. Ray Wolfe, Executive Director
Carlos Rodriguez
John Heimann

■ Building Industry Legal Defense Council

SANBAG considers the Building Industry Legal Defense Council (BILD) and its associated organization the Building Industry Association (BIA) important stakeholders in the Project and appreciates the BILD and BIA's concerns. SANBAG also appreciates BIA's participation in the public meetings provided over the last fourteen months. There are additional opportunities for BILD and BIA to participate in the Project as SANBAG provides GHG Reduction Measure Implementation and Monitoring Tools for the participating cities to use in drafting their own climate action plans using the technical data provided by SANBAG in the San Bernardino County Regional Greenhouse Gas Reduction Plan (Regional Reduction Plan). This next step of the Project includes stakeholder meetings that BILD and BIA can attend.

The following addresses the comments found in the BILD comment letter:

Response to Comments

Comment 1: Title 24 departure mandates would yield very little GHG-reduction benefit; but it obviously has a substantial cost in terms of burdening the builders who must surpass compliance with Title 24.

Response to Comment 1: The Regional Reduction Plan includes Energy-3: Green Building Ordinance for New Buildings that exceeds Title 24 standards. In total, eight cities have chosen Energy 3. However, in balancing the need to reduce GHG emissions and increase the efficiency of buildings while maintaining the economic prosperity of the region, SANBAG recognizes the undue burden that can be placed on the building industry by these types of mandates.

The eight participating cities (Adelanto, Loma Linda, Montclair, Needles, Rancho Cucamonga, Rialto, Twentynine Palms, Victorville, and Yucca Valley) that have elected to use Energy-3 Green Building Ordinance for New Buildings propose to increase participation in PS-1 the GHG Performance Standard, rather than reduce emissions through Energy 3. Therefore, Energy-3 has been deleted as a separate reduction measure for each of these cities. However, the level of participation in PS-1 is increased to capture all of the GHG reductions afforded Energy 3 within the eight cities that previously had elected to use that reduction measure in their City Chapter of the Regional Reduction Plan.

PS-1 requires new development projects to demonstrate GHG reductions that achieve at least the level of reductions shown under PS-1 through various design features that can include exceedance of Title 24 standards or other ways of providing GHG reductions. As such, PS-1 does not alleviate new development of the obligation to reduce GHG emissions shown in the Regional Reduction Plan. PS-1 does provide some flexibility in how development projects will achieve the GHG reductions. (Also see response to Comment 8 in the Center for Biological Diversity Comment Letter and Chapter 4 of this Final EIR for additional details on PS-1).

This change in the Regional Reduction Plan balances the need to reduce GHG reductions without undue economic burden on the building sector of the economy. However, this does not alleviate the building sector from the obligation to reduce fair share quantities of GHG emissions as shown in the Regional Reduction Plan. Because GHG reductions are moved from Energy-3 to PS-1 the total GHG reductions for each city remain the same. This change in the project does not constitute substantial new information or significant changes in the Project that would necessitate recirculation of the Draft EIR because the

change does not create any new environmental impacts or increase the severity of impacts already analyzed in the Draft EIR.

Comment 2: Specific to the City of Chino, the City would not need the Title 24 Departure in order to meet its AB 32 goals.

Response to Comment 2: BILD is confusing the Regional Reduction Plan with the City of Chino's Climate Action Plan. See response to Comment 1 concerning Title 24 departure as a reduction measure (Energy-3).

Comment 3: For climate action planning purposes, cities and counties generally satisfy their respective shares of AB 32 targets in one of two ways: by either reducing total annual GHG emissions in 2020 to 15% below a 2008 baseline year, or reducing total GHG emissions in 2020 to 29% (roughly below a 2020 BAU projection).

Response to Comment 3: The comment refers to the reduction targets chosen by each participating city as described in Section 3 of the Regional Reduction Plan and Section 3 of the Draft EIR (Project Description). Achieving the reduction target for each city is achieved by implementing the reduction measures.

Comment 4: The City of Chino need only reduce emissions to 85% of their 2008 baseline by year 2020. The City's Draft Climate Action Plan reduces emissions below the City's reduction target and the Title 24 Departure mandate is not needed.

Response to Comment 4: BILD is confusing the Regional Reduction Plan with the City of Chino's Climate Action Plan. See response to Comment 1 concerning Title 24 departure as a reduction measure (Energy-3).

Comment 5: California Public Resources Code section 25402.1(h)(2) requires that any local government must justify to the CEC any departure from Title 24.

Response to Comment 5: See response to Comment 1 and note that the departure from Title 24 Standards is no longer a requirement for new development. However, the Regional Reduction Plan still requires new development to reduce its fair share reductions of GHG emissions as shown under the new PS-1 reduction requirements. Details for each city's PS-1 reductions are shown in Chapter 4 of this Final EIR.

Comment 6: In the case of the City of Chino, it appears that the City's Title 24 Departure mandate could not possibly coexist with Calif. Public Resources Code Section 25402.1(h)(2)

Response to Comment 6: See response to Comment 4.

Comment 7: BILD, BIASC and BIASC's Baldy View Chapter respectfully ask SANBAG to inform its constituent cities of the need to forgo Title 24 Departure mandates ...

Response to Comment 7: See response to Comment 1.

Comment 8: Our staff at BIASC’s Baldy View Chapter will likely raise these concerns in the proper forums and meetings. In addition, however, we respectfully ask that a written response from SANBAG concerning this issue be sent to BIASC’s Baldy View Chapter, specifically to the attention of Carlos Rodriquez.

Response to Comment 8: Thank you for your comments and participation in the public meetings for this project that have occurred in November 2012 and November and December 2013. SANBAG has provided written responses to your comments both within this Final EIR and sent the responses to BIASC’s Baldy View Chapter to the attention of Carlos Rodriguez. In addition, SANBAG invites representatives of BILD and BIASC to stakeholder meetings that will occur for the next phase of this project in the development of GHG Reduction Measure Implementation and Monitoring Tools for participating cities to use in developing climate action plans for their city and during implementation of the reduction measures.

CHAPTER 4 Errata and Refinements to the Draft EIR

4.1 INTRODUCTION

The following section includes revisions to the text of the Draft EIR. These revisions are listed by page number, and section, in some instances. Text additions are bolded and underlined and text deletions are shown in stricken text.

4.2 REVISIONS TO THE TEXT OF THE DRAFT EIR

Table 4-1 (Revisions to the Draft EIR) summarizes the revisions to the Draft EIR.

<i>Item</i>	<i>EIR Section</i>	<i>Proposed Change</i>
Project Description	Section 3.4 (Summary of Reduction Measures)	Energy-3 is deleted from the list of Reduction Measures and the quantity of GHG emissions reduced by Energy-3 allocated to PS-1.
Project Description	Section 3.4 (Summary of Reduction Measures)	The project description includes additional details in the description of Reduction Measure PS-1.
Environmental Analysis Introduction	Sections 4.1.0 through 4.21.0	Tables 4.1-3 through 4.21-3 and 4.1-4 through 4.21-4 show the reallocation of reductions from reduction measure Energy-3 to PS-1 as well as changes due a reduction in the value of water measures. Figures 4.1-2, 4.3-2 through 4.11-2, and 4.13-2 through 4.21-2 were also revised per changes in reduction totals.
Aesthetics Impacts, City of San Bernardino	Chapter 4, Section 4.17.1 (Aesthetics)	Impact 4.17.1 and mitigation measures MM4.17.1-1a through MM4.17.1-3b are revised to exclude wind turbines.
Air Quality Impacts, cities of Fontana, Montclair, Ontario, Rancho Cucamonga, Redlands, Rialto, and San Bernardino	Chapter 4, Sections 4.6.3, 4.11.3, 4.13.3, 4.14.3, 4.15.3, 4.16.3, and 4.17.3 (Air Quality and Sensitive Receptors)	Impacts 4.6.3-1, 4.11.3-1, 4.13.3-1, 4.14.3-1, 4.15.3-1, 4.16.3-1, and 4.17.3-1 and mitigation measures MM4.6.3-1, MM4.11.3-1, MM4.13.3-1, MM4.14.3-1, MM4.15.3-1, and MM4.16.3-1 are revised to provide the ability to development near transit stations and mitigate air toxics.
Land Use, City of San Bernardino	Chapter 4, Section 4.17.10 (Land Use)	Figure 4.17.10-2 (City of San Bernardino Land Use Map) is updated to reflect the latest Land Use Map adopted in 2013.

4.2.1 Draft EIR Chapter 3, Section 3.4 (Project Characteristics)

Page 3-10 (2nd paragraph): The Energy-3 Reduction Measure is deleted as follows

~~Energy-3: Green Building Ordinance for New Buildings~~

Measure Description: ~~Adopt a green building ordinance that exceeds Title 24 standards (or any subsequent standards that replace the current Title 24 standards) by achieving at least Tier 1 voluntary standards within CALGreen (California Air Pollution Control Officers Association 2010; California Attorney General’s Office 2010). Tier 1 and 2 measures are not mandatory unless adopted by cities as~~

~~part of the code. Residential voluntary measures related to energy efficiency in Tier 1 and Tier 2 include the following:~~

- ~~■ Use of exterior window shading (A4.205.2)~~
- ~~■ Use of innovative HVAC systems such as radiant, hydronic, ground source, or others (A4.207.1)~~
- ~~■ Use of Energy Star® rated appliances (A4.210.1)~~
- ~~■ Use of electric heat pumps with Heating Seasonal Performance Factor of 8.0 or higher (A4.207.6)~~
- ~~■ Solar water heating systems (A4.211.2)~~
- ~~■ Duct leakage and location requirements (A4.207.8 and A4.207.7)~~

~~**Entity Responsible for Implementation:** The individual city governments are responsible for implementing this measure.~~

~~**Measure Implementation Details:** The city governments can each adopt a green building ordinance. This measure would be implemented when each city adopts an ordinance. Benefits from the measure would be gradual as new houses are constructed according to the ordinance. SCE has programs and incentive funding, such as rebates, for energy efficient appliances, lighting, heating, and home energy performance.~~

~~**Level of Commitment:** Each city selecting this measure would require new buildings to exceed Title 24 standards (or any subsequent standards that replaces the current Title 24 standards) by 15 percent in 2020 (CALGreen Tier 1).~~

~~**Co-Benefits:** Reduced energy use, reduced air pollution, resource conservation, increased property values, public health improvement, and increased quality of life.~~

The following text replaces Energy-3 on Page 3.10 (2nd paragraph)

To provide a more cost effective and flexible way of reducing GHG emissions associated with new development, the GHG emission reduction quantities attributed to the Energy-3 Green Building Ordinance for New Development are moved and combined with PS-1 the GHG Performance Standard for New Development. Total GHG reductions for each Participating City and for the Regional Reduction Plan as a whole remain the same.

4.2.2 Draft EIR Chapter 3, Section 3.4 (Project Characteristics)

Pages 3-30 through 3-31: Since the public release of the draft Regional Reduction Plan in June 2013, SANBAG has continued to develop additional details on quantifying reductions during implementation of PS-1. The following text in underline is added to the description of PS-1 in the EIR.

■ GHG Performance Standard for New Development

PS-1: GHG Performance Standard for New Development

Measure Description: Individual cities may adopt a GHG Performance Standard for New Development (PS) that would provide a streamlined and flexible program for new projects to reduce

their emissions. The PS would be a reduction standard for new private developments as part of the discretionary approval process under CEQA. Under the PS, new projects would be required to quantify project-generated GHG emissions and adopt feasible reduction measures to reduce project emissions to a level that is a certain percent below BAU project emissions. The PS does not require project applicants to implement a pre-determined set of measures. Rather, project applicants are allowed to choose the most appropriate measures for achieving the percent reduction goal, while taking into consideration cost, environmental or economic benefits, schedule, and other project requirements. SCAQMD does not have CEQA significance thresholds for new nonindustrial development at this time. One potential PS reduction goal could be 29 percent, based on San Joaquin Air Pollution Control District's recommended CEQA significance threshold and based on the calculations of reductions necessary at the state level to meet AB 32 at the time of the Scoping Plan (29 percent below forecasted 2020 levels = 1990 levels based on data available at that time). Another potential minimum goal could be 20 to 22 percent based on the most recent 2020 forecast data from CARB. San Bernardino County adopted a performance standard of 31 percent for certain discretionary projects within the unincorporated county with emissions more than 3,000 MT CO₂e/year. Projects with less than 3,000 MT CO₂e/year are still required to meet certain specified performance measures that also result in GHG emission reductions.

Entity Responsible for Implementation: The individual city governments are responsible for implementing this measure.

Measure Implementation Details: Implementation of the performance standard would reduce GHG emissions attributable to new discretionary development projects within each Participating City. The prescribed amount of GHG emissions reduced within each Participating City due to PS-1 are shown in the revised Tables 4.1-4 through 4.21-4 shown below. Measurable reductions of GHG emissions would be achieved through each city's review and discretionary approval of residential, commercial, and industrial development projects.

All new development projects subject to discretionary approval by the Participating Cities as Lead Agencies within their jurisdictions would be required to demonstrate compliance with PS-1 through a menu of options called "Screening Tables." The purpose of these Screening Tables is to provide quantitative reduction values of GHG emissions attributable to certain design and construction measures incorporated into development projects. The Screening Table assigns points for each option incorporated into a project as mitigation or a project design feature (collectively referred to as "feature"). The point values correspond to the minimum emissions reduction expected from each feature. The menu of features allows maximum flexibility and options for how development projects can implement the GHG reduction measures. Projects that garner at least 100 points will be consistent with the reduction quantities anticipated in the Regional Reduction Plan.

The 100 point allocation within the Screening Tables for each Participating City was determined by taking the GHG reductions expected from PS-1 for that City as shown in Table 4.1-4 through Table 4.21-4 below and proportioning the GHG emissions reduction by the incremental growth in new residential units or square feet of commercial/industrial uses. This was accomplished by taking the predicted growth in households and commercial uses in 2020 for each Participating City and proportioning the appropriate reduction quantities for new development to the residential, commercial, and industrial land use sectors within the Screening Table. The result is a fair share allocation of GHG

emission reductions within each Participating City that are proportioned by residential unit or commercial/industrial square feet. Because of this, the size of the project is not relevant to the Screening Table. Regardless of size, each project needs to garnish 100 points to demonstrate consistency with the Regional Reduction Plan. Efficiency, not size of the project, is critical. Points attributed to each of the “features” within the menu of options were derived using the methodology and calculations for GHG emission mitigation found in the CAPCOA document titled “Quantifying Greenhouse Gas Mitigation Measures (CAPCOA, 2010).

~~It is expected that project proponents would often include energy efficiency and alternative energy strategies to help reduce their project’s GHG emissions because these are often the most cost effective approach to reducing GHG emissions, but are free to propose any valid measures that would achieve the overall reduction goal. In order to calculate the reductions from this measure, state measures and local mandatory measures were quantified for new development for each city. These measures achieve a certain portion of the PS goal, depending on the city. The PS contributes the remaining percent reduction required to achieve the PS goal in new developments. The reduction amounts for each individual project within each city from state or other local measures would vary; however, state and local mandatory measures are still expected to result in the largest share of the burden in meeting the PS reduction target for all cities. Some cities already require discretionary projects, through the CEQA process, to identify their GHG emissions and to mitigate those emissions when feasible mitigation is available and there are no overriding circumstances.~~

Level of Commitment: Each city selecting this measure would have to adopt a GHG Performance Standard for New Development, requiring at least ~~20 to 29 percent~~ the prescribed reductions in new development emissions within the cities as shown in Table 4.1-4 through Table 4.21-4.

Co-Benefits: Co-benefits would depend on the exact measures selected by individual project proponents, but would be the same as the corresponding strategies described for the other measures (e.g., if a project proponent were to select energy efficiency measures as part of meeting project reductions, the benefits would be similar in character to those described for energy efficiency retrofits).

4.2.3 Draft EIR Chapter 4 (Introduction to the Analysis)

The Draft Regional Reduction Plan included Energy-3: Green Building Ordinance for New Buildings that exceeds Title 24 standards. In total, eight cities chose Energy-3 in the Draft Plan. However, in balancing the need to reduce GHG emissions and increase the efficiency of buildings while maintaining the economic prosperity of the region, SANBAG recognizes the undue burden that can be placed on the building industry by these types of mandates.

The eight participating cities (Adelanto, Loma Linda, Montclair, Needles, Rancho Cucamonga, Rialto, Twentynine Palms, and Victorville) that elected to use Energy-3 Green Building Ordinance for New Buildings in the Draft Plan propose instead to increase participation in PS-1 the GHG Performance Standard, rather than reduce emissions through Energy 3 in the Final Plan. The level of participation in PS-1 is increased to capture all of the GHG reductions afforded Energy 3 within the eight cities that had elected to use that reduction measure in their City Chapter of the Regional Reduction Plan. Because of this, Tables 4.1-4 and 4.3-4 through 4.19-4 in the Draft EIR are modified to show this change.

In addition, a minor error in the calculations of GHG emissions reductions associated with the water conservation was found. While correcting the error changed the numerical values of 2020 GHG emissions for each city in the Regional Reduction Plan and associated Draft EIR, each of the Participating Cities still met their GHG reduction targets and the Findings in the Draft EIR associated with environmental impacts from GHG emissions remain the same. To provide accuracy in the FEIR, Figures 4.1-2, 4.3-2 through 4.11-2, and 4.13-2 through 4.21-2 and Tables 4.1-3 and 4.3-3 through 4.21-3 in the Draft EIR are modified to show this correction.

Because of these changes in reduction quantities, Figures 4.1-2, 4.3-2 through 4.11-2, and 4.13-2 through 4.21-2 are updated as shown in the following pages below. In addition, Tables 4.1-3 and 4.3-3 through 4.21-3 and Tables 4.1-4 and 4.3-4 through 4.21-4 are shown in ~~strikeout (deleted text)~~ and underline (added text).

4.2.4 Draft EIR Chapter 4, Section 4.1.0 (Introduction to the Analysis) [City of Adelanto]

Page 4.1.0-13 (Figure 4.1-2)

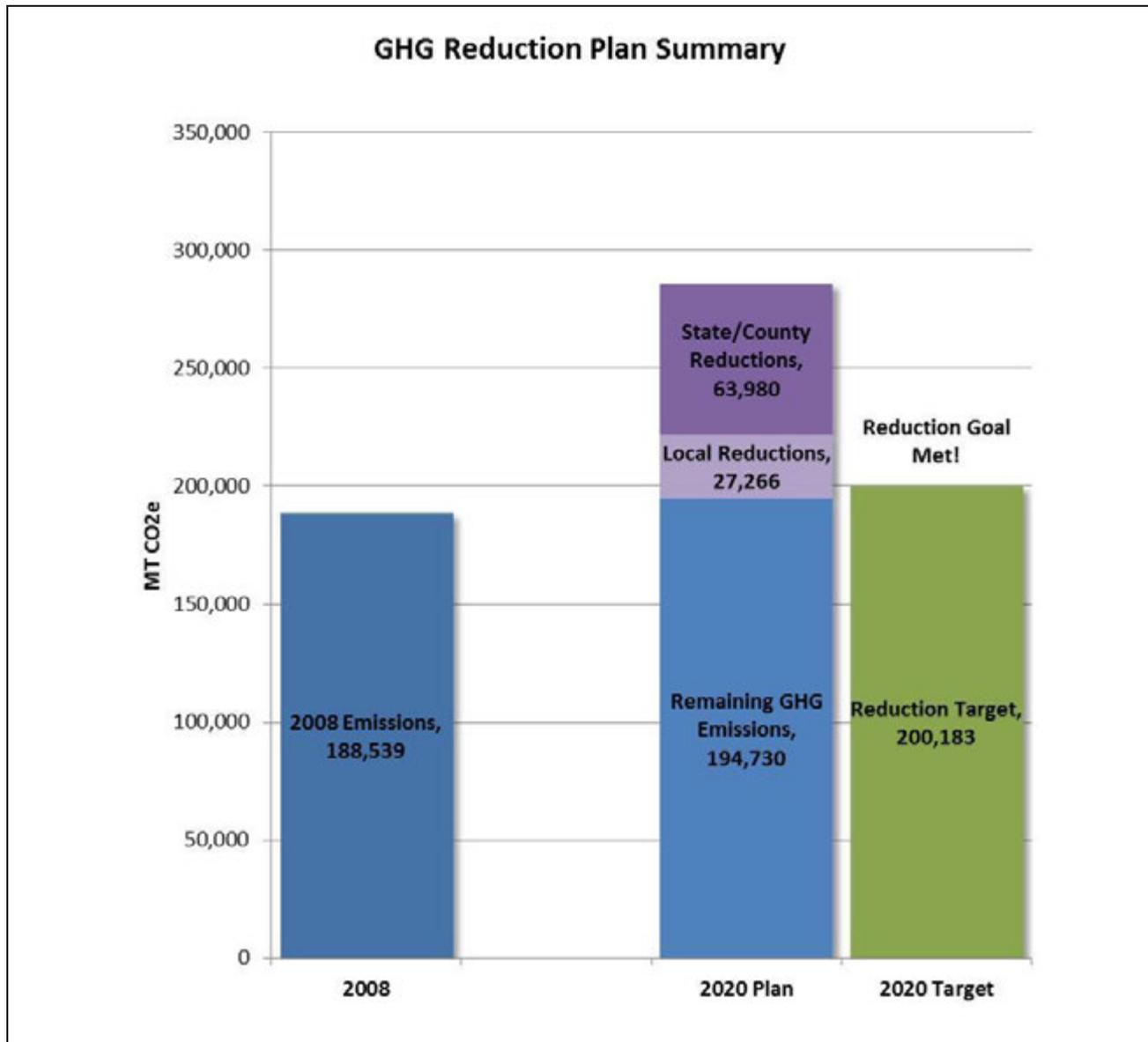


Figure 4.1-2 Emissions Reduction Profile for Adelanto

Page 4.1.0-12 (Table 4.1-3)

Table 4.1-3 Emission Reduction by Sector for Adelanto					
Sector	2008	2020 BAU	Reductions	2020 Emissions with Plan	% Reduction
Building Energy	63,173	92,446	<u>33,830</u> 42,004	<u>58,160</u> 50,445	<u>36.6%</u> 45.4%
On-Road Transportation	97,508	161,472	43,896	117,576	27.2%
Off-Road Equipment	12,144	17,655	3,157	14,498	17.9%
Solid Waste Management	1,744	2,381	270	2,110	11.3%
Agriculture	9,664	4,925	0	4,925	0.0%
Wastewater Treatment ⁶	1,262	1,876	176	1,699	9.4%
Water Conveyance	3,045	5,222	1,122	4,100	21.5%
GHG Performance Standard*	—	—	<u>8,796</u> 7,139	—	—
Total Emissions	188,539	285,976	<u>91,246</u> 97,760	<u>194,730</u> 188,216	<u>31.9%</u> 34.2%
Reduction Goal	—	—	85,793	200,183	30.0%
Met Goal?	—	—	Yes	Yes	Yes
Reductions Beyond Goal	—	—	<u>5,453</u> 11,967	—	—
Per-Capita Emissions	6.0	6.2	—	<u>4.2</u> 4.1	—
Per-Job Emissions	34.7	39.1	—	<u>26.6</u> 25.7	—
Excluded Stationary Source Emissions	16,597	22,015	—	—	—

SOURCE: San Bernardino Associated Governments, *San Bernardino County Regional Greenhouse Gas Reduction Plan*, Draft, Prepared by ICF International (December 2012).

Values may not sum due to rounding.

* The GHG Performance Standard for New Development is not a sector of the inventory, but it provides broad reductions and contributes toward the City's reduction goal by promoting reductions in multiple sectors.

Page 4.1.0-14 (Table 4.1-4)

Table 4.1-4 GHG Reduction Measures and Estimated 2020 Reduced Emissions in Adelanto

<i>Reduction Measure Number</i>	<i>Description</i>	<i>Emissions Reduced</i>
LOCAL MEASURES		
Building Energy		
Energy-1	Energy Efficiency of Existing Buildings	832
Energy-2	Outdoor Lighting	726
Energy-3	Green Building Ordinance	1,702
Energy-4	Solar Installation for New Housing	1,817
Energy-5	Solar Installation for New Commercial	765
Energy-7	Solar Installation for Existing Housing	2,700
Energy-8	Solar Installation for Existing Commercial/Industrial	379
Energy-9	Co-Generation Facilities	23
<i>LandUse-1 (BE)</i>	<i>Tree Planting Programs</i>	172
<i>LandUse-2 (BE)</i>	<i>Promote Rooftop Gardens</i>	4
<i>Wastewater-2 (BE)</i>	<i>Equipment Upgrades</i>	303
<i>Water 1 (BE)</i>	<i>Require Tier 1 Voluntary CALGreen Standards for New Construction</i>	849 842
<i>Water 2 (BE)</i>	<i>Renovate Existing Buildings to Achieve Higher Levels of Water Efficiency</i>	1,104 1,068
<i>Water 4 (BE)</i>	<i>Implement SBX 7-7</i>	4,499 11,049
GHG Performance Standard for New Development		
PS-1	GHG Performance Standard for New Development (30% below Projected BAU emissions for projects)	8,796 7,139
Total Reductions		91,246 97,760

4.2.5 Draft EIR Chapter 4 Section 4.3.0 (Introduction to the Analysis) [City of Chino]

Page 4.3.0-29 (Figure 4.3-2)

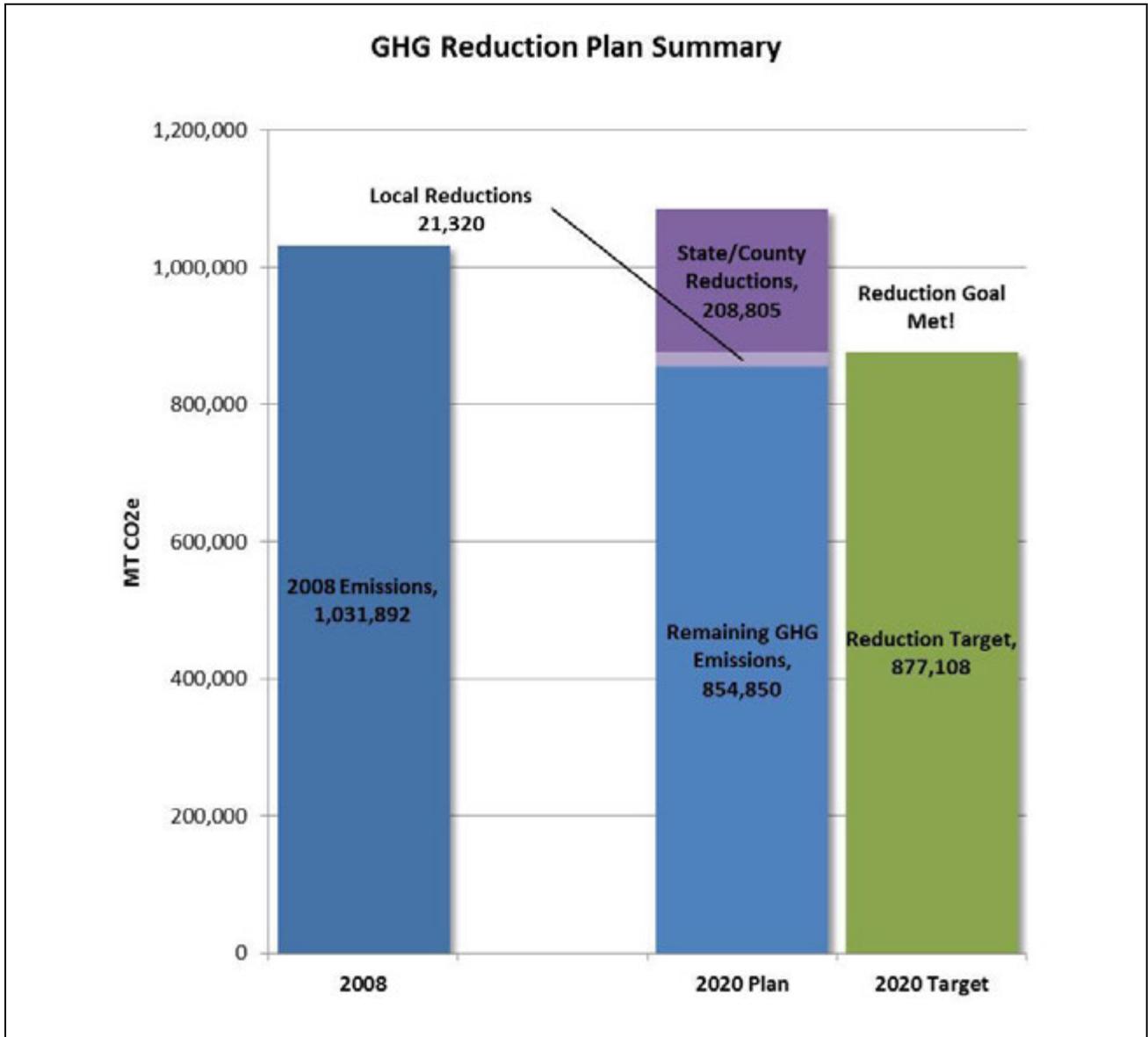


Figure 4.3-2 Emissions Reduction Profile for Chino

Page 4.3.0-31 (Table 4.3-3)

Table 4.3-3 Emission Reduction by Sector for China					
Sector	2008	2020 BAU	Reductions	2020 Emissions with Plan	% Reduction
Building Energy	403,585	456,978	<u>103,579</u> 119,138	<u>353,399</u> 337,840	<u>22.7%</u> 26.1%
On-Road Transportation	407,132	443,060	<u>113,419</u> 117,200	<u>329,640</u> 325,860	<u>25.6%</u> 26.5%
Off-Road Equipment	82,908	90,661	8,100	82,562	8.9%
Solid Waste Management	16,239	17,305	2,077	15,227	12.0%
Agriculture- 356	101,287	51,623	0	51,623	0%
Wastewater Treatment- 6	3,057	3,613	232	3,381	6.4%
Water Conveyance- 29	17,684	21,736	2,432	19,305	11.2%
GHG Performance Standard*	—	—	286	—	—
Total Emissions	1,031,892	1,084,975	<u>230,126</u> 249,465	<u>854,850</u> 839,290	<u>21.2%</u> 23.0%
Reduction Goal	—	—	207,867	877,108	19.2%
Met Goal?	—	—	Yes	Yes	Yes
Reductions Beyond Goal	—	—	<u>22,258</u> 41,597	—	—
Per-Capita Emissions	13.7	12.2	—	<u>9.6</u> 9.4	—
Per-Job Emissions	21.3	20.3	—	<u>16.0</u> 15.6	—
Excluded Stationary Source Emissions	207,650	244,412	—	—	—

SOURCE: San Bernardino Associated Governments, *San Bernardino County Regional Greenhouse Gas Reduction Plan*, Draft, Prepared by ICF International (December 2012).

Values may not sum due to rounding.

* The GHG Performance Standard for New Development is not a sector of the inventory, but it provides broad reductions and contributes toward the City's reduction goal by promoting reductions in multiple sectors.

Page 4.3.0-33 (Table 4.3-4)

Table 4.3-4 GHG Reduction Measures and Estimated 2020 Reduced Emissions in Chino		
<i>Reduction Measure Number</i>	<i>Description</i>	<i>Emissions Reduced</i>
LOCAL MEASURES		
Building Energy		
Energy-1	Energy Efficiency of Existing Buildings	2,019
Energy-4	Solar Installation for New Housing	359
Energy-5	Solar Installation for New Commercial	1,104
Energy-7	Solar Installation for Existing Housing	2,629
Energy-8	Solar Installation for Existing Commercial/Industrial	1,569
<u>Wastewater-2 (BE)</u>	<u>Equipment Upgrades</u>	<u>1,249</u>
<u>Water 4 (BE)</u>	<u>Implement SBX 7-7</u>	<u>8,823</u>
Total Reductions		<u>230,126</u> 249,465

4.2.6 Draft EIR Chapter 4 Section 4.4.0 (Introduction to the Analysis) [City of Chino Hills]

Page 4.4.0-9 (Figure 4.4-2)

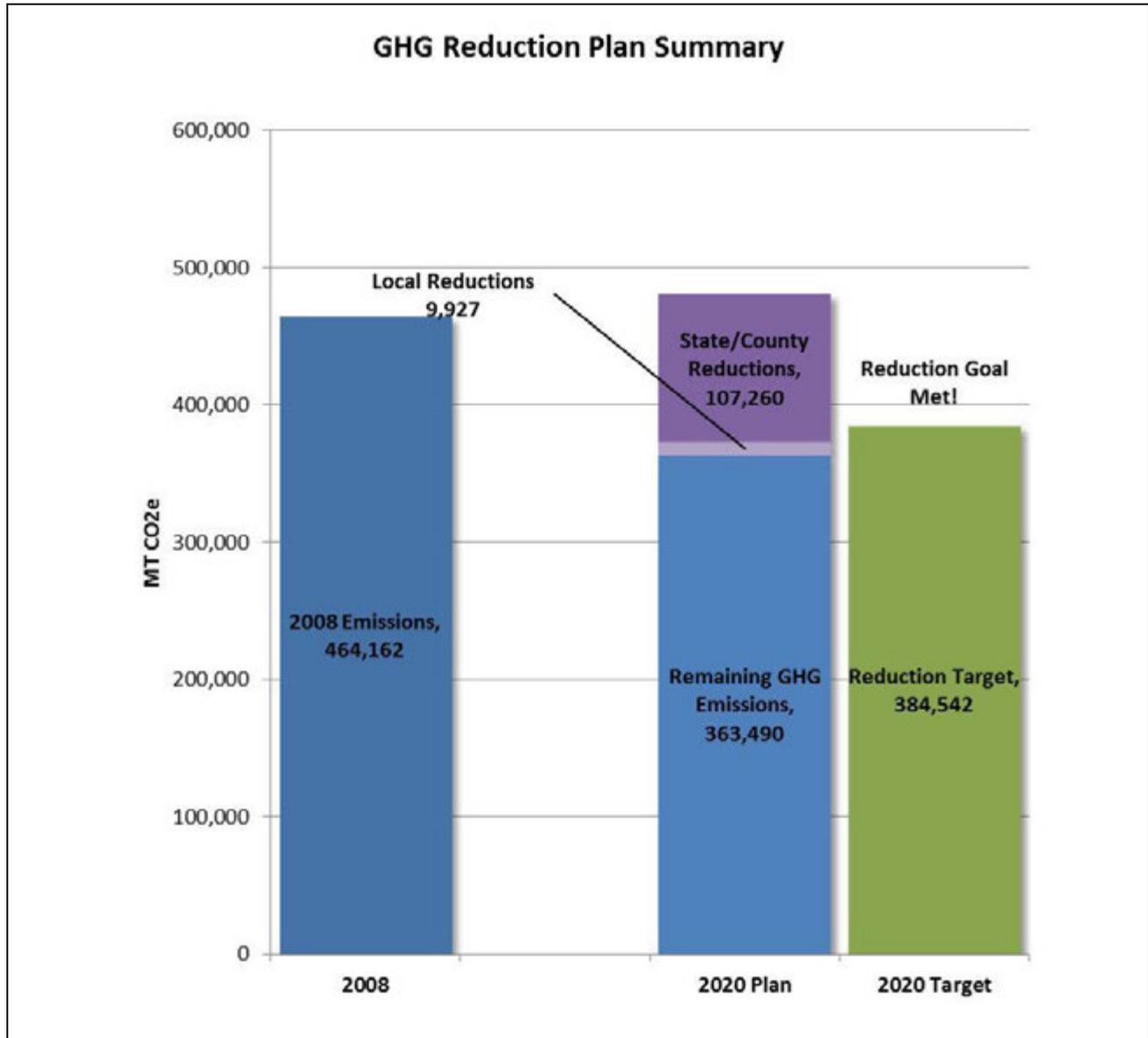


Figure 4.4-2 Emissions Reduction Profile for Chino Hills

Page 4.4-10 (Table 4.4-3)

Table 4.4-3 Emission Reduction by Sector for Chino Hills					
Sector	2008	2020 BAU	Reductions	2020 Emissions with Plan	% Reduction
Building Energy	162,380	173,369	39,579 49,040	133,790 124,328	22.8% 28.3%
On-Road Transportation	265,707	265,709	74,014	191,696	27.9%
Off-Road Equipment	14,628	15,040	1,344	13,696	8.9%
Solid Waste Management	6,831	11,754	80	11,674	0.7%
Agriculture	5,691	2,900	0	2,900	0.0%
Wastewater Treatment	3,016	3,116	265	2,851	8.5%
Water Conveyance	5,909	8,790	1,906	6,883	21.7%
GHG Performance Standard*	—	—	2,710	—	—
Total Emissions	464,162	480,677	<u>117,187</u> 126,649	<u>363,490</u> 354,028	<u>24.4%</u> 26.3%
Reduction Goal	—	—	96,135	384,542	20.0%
Met Goal?	—	—	Yes	Yes	Yes
Reductions Beyond Goal	—	—	<u>21,052</u> 30,514	—	—
Per-Capita Emissions	6.2	6.3	—	<u>4.7</u> 4.6	—
Per-Job Emissions	49.9	46.0	—	<u>34.8</u> 33.9	—
Excluded Stationary Source Emissions	25,417	33,375	—	—	—

SOURCE: San Bernardino Associated Governments, *San Bernardino County Regional Greenhouse Gas Reduction Plan*, Draft, Prepared by ICF International (December 2012).

Values may not sum due to rounding.

* The GHG Performance Standard for New Development is not a sector of the inventory, but it provides broad reductions and contributes toward the City's reduction goal by promoting reductions in multiple sectors.

Page 4.4-12 (Table 4.4-4)

Table 4.4-4 GHG Reduction Measures and Estimated 2020 Reduced Emissions in Chino Hills		
Reduction Measure Number	Description	Emissions Reduced
LOCAL MEASURES		
Building Energy		
Energy-7	Solar Installation for Existing Housing	1,654
Wastewater-2 (BE)	Equipment Upgrades	632
Water 4 (BE)	Implement SBX 7-7	<u>5,034</u> 44,496
Total Reductions		<u>117,187</u> 249,465

4.2.7 Draft EIR Chapter 4 Section 4.5.0 (Introduction to the Analysis) [City of Colton]

Page 4.5.0-7 (Figure 4.5-2)

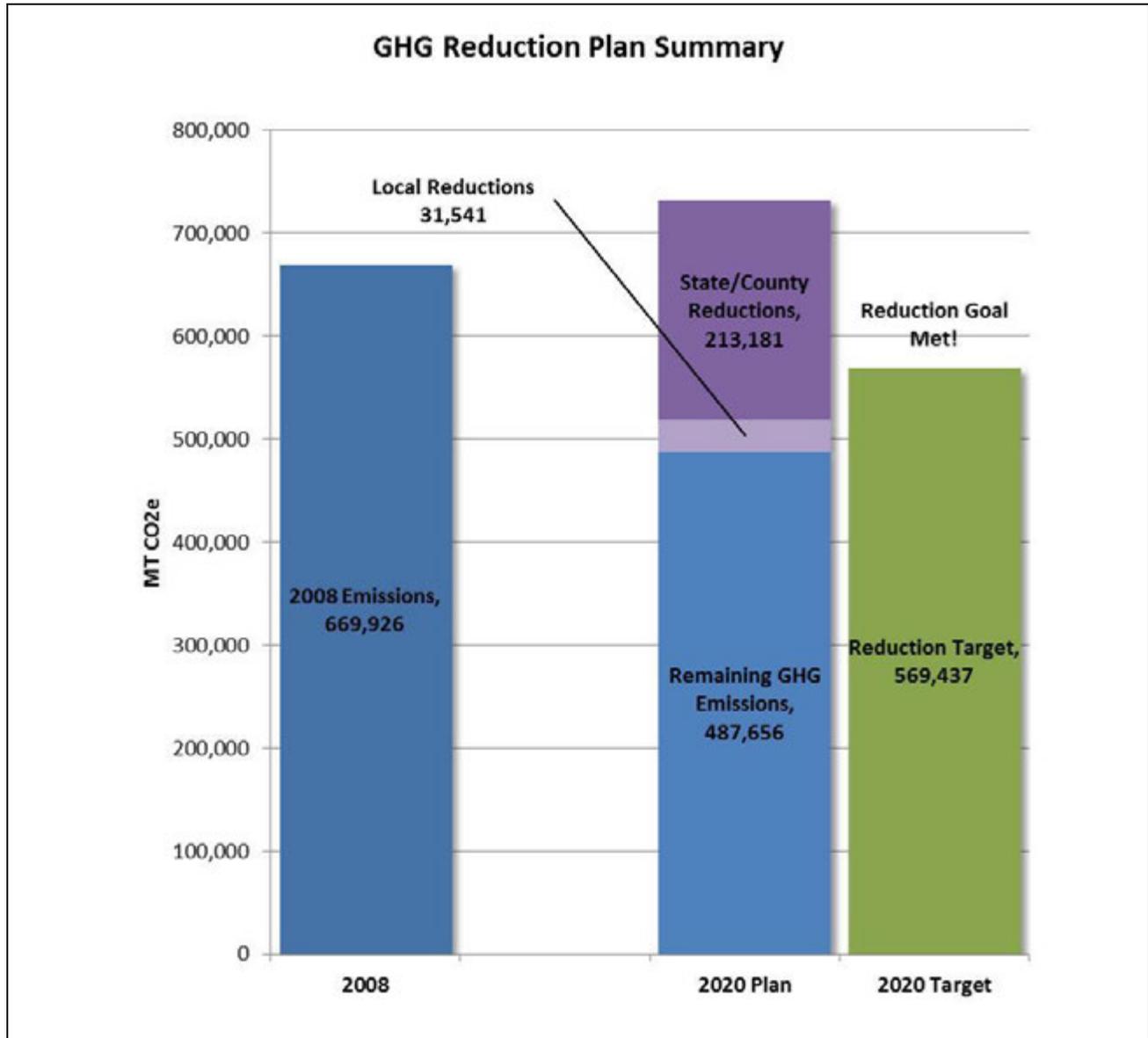


Figure 4.5-2 Emissions Reduction Profile for Colton

Page 4.5.0-8 (Table 4.5-3)

Table 4.5-3 Emission Reduction by Sector for Colton					
Sector	2008	2020 BAU	Reductions	2020 Emissions with Plan	% Reduction
Building Energy	410,302	437,695	<u>155,962</u> 465,269	<u>281,734</u> 272,426	<u>35.6%</u> 37.8%
On-Road Transportation	215,836	230,059	65,043	165,017	28.3%
Off-Road Equipment	22,891	26,167	3,368	22,799	12.9%
Solid Waste Management	18,037	18,826	12,209	6,616	64.9%
Agriculture	731	373	0	373	0.0%
Wastewater Treatment	2,128	2,519	1,566	953	62.2%
Water Conveyance	12,492	16,739	2,955	13,783	17.7%
GHG Performance Standard*	—	—	<u>3,618</u> 238	—	—
Total Emissions	682,418	732,377	<u>244,722</u> 250,649	<u>487,656</u> 481,728	<u>33.4%</u> 34.2%
Reduction Goal	—	—	<u>162,940</u> 152,322	<u>569,437</u> 580,055	<u>22.2%</u> 20.8%
Met Goal?	—	—	Yes	Yes	Yes
Reductions Beyond Goal	—	—	<u>81,782</u> 98,684	—	—
Per-Capita Emissions	13.1	12.1	—	<u>8.0</u> 7.9	—
Per-Job Emissions	28.4	28.7	—	<u>19.1</u> 18.9	—
Excluded Stationary Source Emissions	55,509	60,605	—	—	—

SOURCE San Bernardino Associated Governments, *San Bernardino County Regional Greenhouse Gas Reduction Plan*, Draft, Prepared by ICF International (December 2012).

Values may not sum due to rounding.

* The GHG Performance Standard for New Development is not a sector of the inventory, but it provides broad reductions and contributes toward the City's reduction goal by promoting reductions in multiple sectors.

Page 4.5.0-10 (Table 4.5-4)

Table 4.5-4 GHG Reduction Measures and Estimated 2020 Reduced Emissions in Colton

<i>Reduction Measure Number</i>	<i>Description</i>	<i>Emissions Reduced</i>
LOCAL MEASURES		
Building Energy		
Energy-1	Energy Efficiency of Existing Buildings	6,966
Energy-2	Outdoor Lighting	1,251
Energy-4	Solar Installation for New Housing	1,766
Energy-8	Solar Installation for Existing Commercial/Industrial	2,101
<i>Water 1 (BE)</i>	<i>Require Tier 1 Voluntary CALGreen Standards for New Construction</i>	<u>676</u> 672
<i>Water 4 (BE)</i>	<i>Implement SBX 7-7</i>	<u>5,452</u> 14,765
GHG Performance Standard for New Development		
PS-1	GHG Performance Standard for New Development (30% below Projected BAU emissions for projects)	<u>3,618</u> 238
Total Reductions		<u>244,722</u> 250,649

4.2.8 Draft EIR Chapter 4 Section 4.6.0 (Introduction to the Analysis) [City of Fontana]

Page 4.6-14 (Figure 4.6-2)

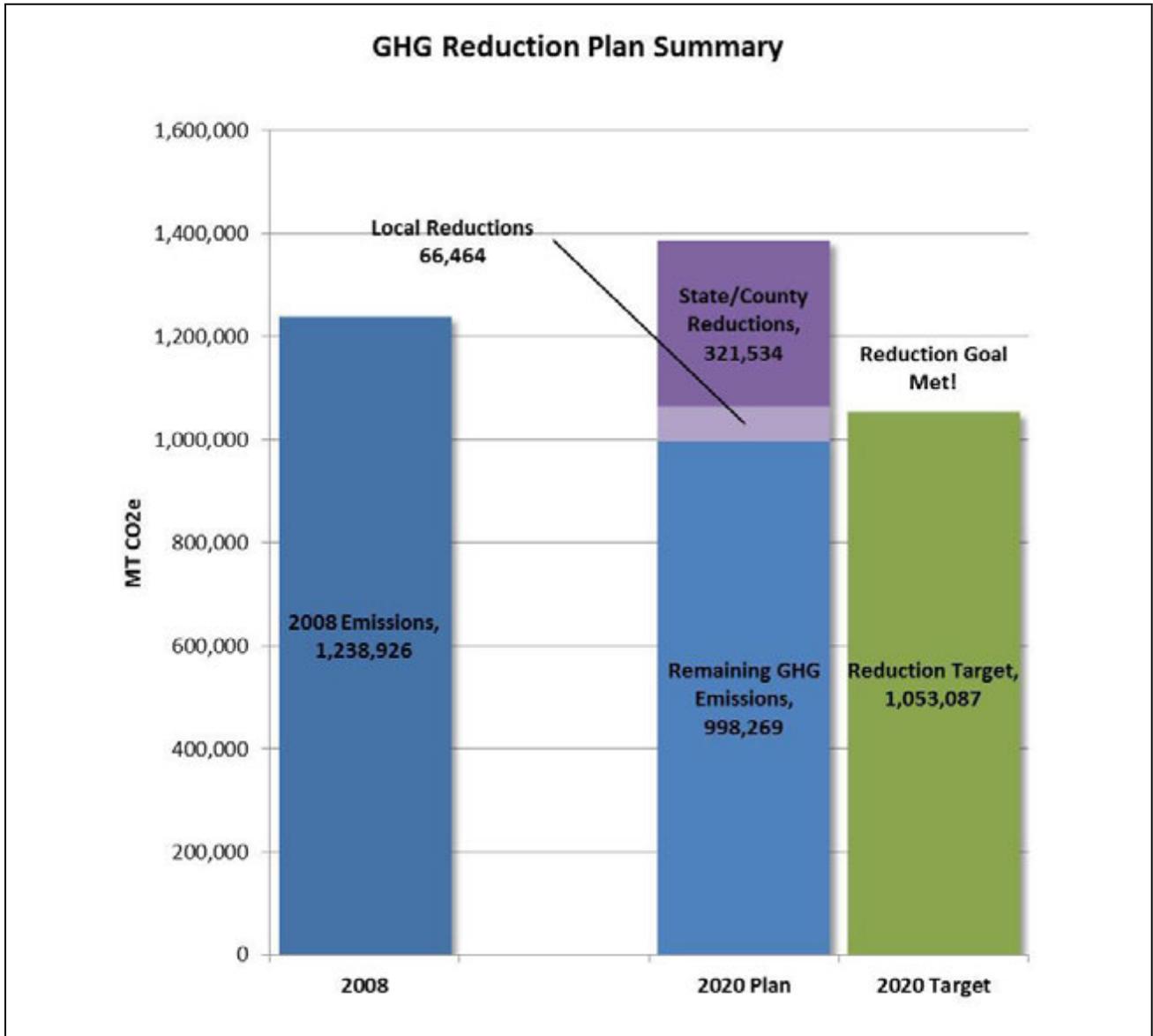


Figure 4.6-2 Emissions Reduction Profile for Fontana

Page 4.6-15 (Table 4.6-3)

Table 4.6-3 Emission Reduction by Sector for Fontana					
Sector	2008	2020 BAU	Reductions	2020 Emissions with Plan	% Reduction
Building Energy	483,683	556,973	<u>152,699</u> 210,326	<u>404,274</u> 346,647	<u>27.4%</u> 37.8
On-Road Transportation	635,066	690,099	190,870	499,229	27.7 percent
Off-Road Equipment	73,650	83,979	7,503	76,477	8.9 percent
Solid Waste Management	19,570	24,052	16,315	7,737	67.8 percent
Agriculture	3,850	1,962	0	1,962	0.0 percent
Wastewater Treatment	7,842	9,064	992	8,072	10.9 percent
Water Conveyance	15,265	20,138	6,043	14,095	30.0 percent
GHG Performance Standard*	—	—	13,575	—	—
Total Emissions	1,238,926	1,386,267	<u>387,998</u> 445,624	<u>998,269</u> 940,643	<u>28.0</u> 32.1 percent
Reduction Goal			333,180	1,053,087	24.0 percent
Met Goal?			Yes	Yes	Yes
Reductions Beyond Goal			<u>54,818</u> 412,444		
Per-Capita Emissions	6.4	6.2		<u>4.5</u> 4.2	
Per-Job Emissions	21.9	20.3		<u>18.6</u> 17.5	
Excluded Stationary Source Emissions	131,922	151,072			

SOURCE: San Bernardino Associated Governments, *San Bernardino County Regional Greenhouse Gas Reduction Plan*, Draft, Prepared by ICF International (December 2012).

Values may not sum due to rounding.

* The GHG Performance Standard for New Development is not a sector of the inventory, but it provides broad reductions and contributes toward the City's reduction goal by promoting reductions in multiple sectors.

Page 4.6-17 (Table 4.6-4)

Table 4.6-4 GHG Reduction Measures and Estimated 2020 Reduced Emissions in Fontana		
Reduction Measure Number	Description	Emissions Reduced
LOCAL MEASURES		
Building Energy		
Energy-2	Outdoor Lighting	3,324
Wastewater-2 (BE)	Equipment Upgrades	2,638
Water 4 (BE)	Implement SBX 7-7	<u>33,265</u> 90,894
Total Reductions		<u>387,998</u> 445,624

4.2.9 Draft EIR Chapter 4 Section 4.7.0 (Introduction to the Analysis) [City of Grand Terrace]

Page 4.7.0-9 (Figure 4.7-2)

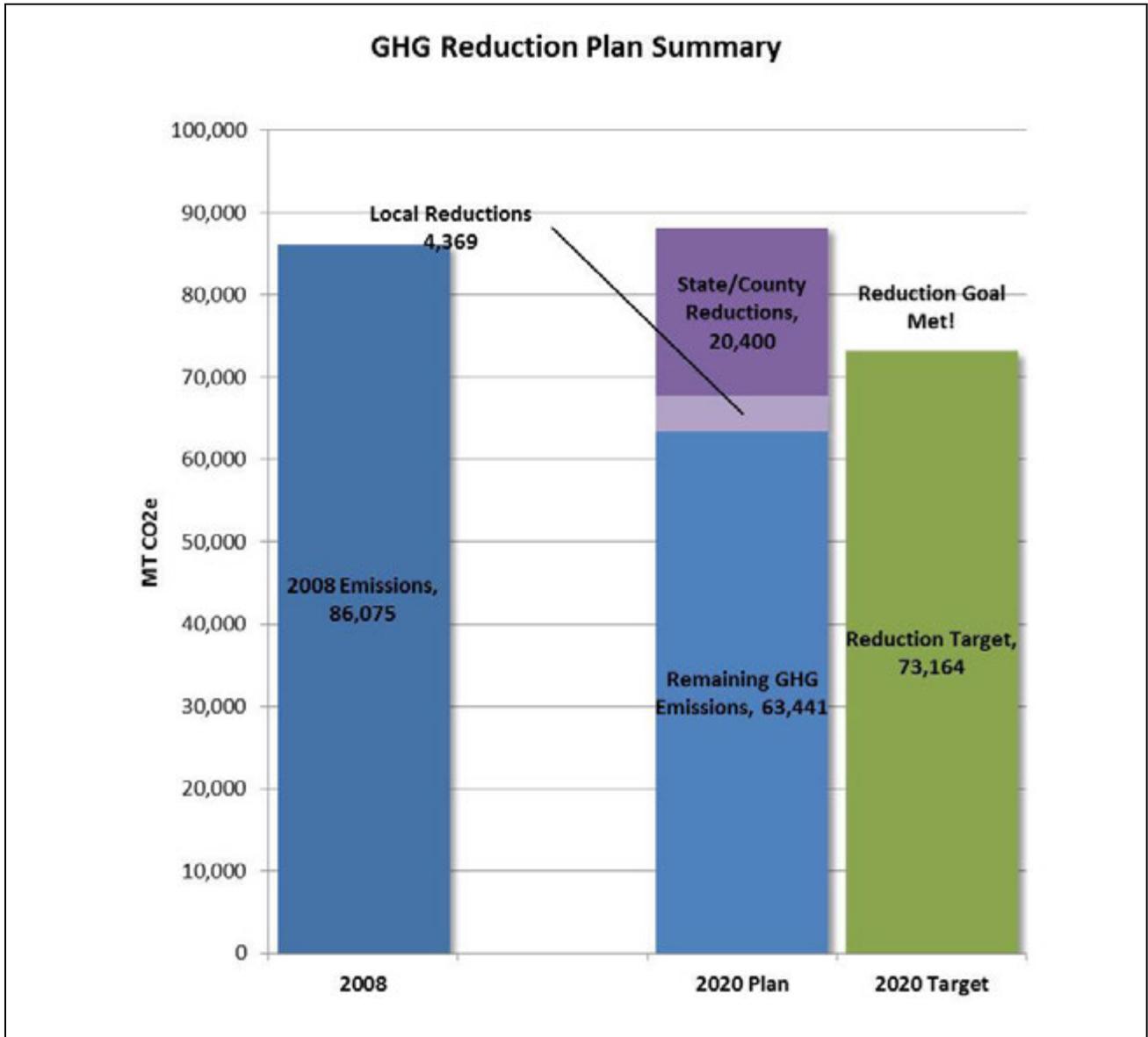


Figure 4.7-2 Emissions Reduction Profile for Grand Terrace

Page 4.7.0-10 (Table 4.7-3)

Table 4.7-3 Emission Reduction by Sector for Grand Terrace					
Sector	2008	2020 BAU	Reductions	2020 Emissions with Plan	% Reduction
Building Energy	33,593	35,395	<u>9,503</u> 14,780	<u>25,891</u> 20,615	<u>26.9%</u> 41.8%
On-Road Transportation	41,756	41,436	11,791	29,645	28.5%
Off-Road Equipment	3,909	3,922	350	3,572	8.9%
Solid Waste Management	3,863	3,895	2,685	1,210	68.9%
Agriculture	116	59	0	59	0.0%
Wastewater Treatment	476	474	45	429	9.4%
Water Conveyance	2,362	3,029	388	2,641	12.8%
GHG Performance Standard*	—	—	6	—	—
Total Emissions	86,075	88,210	<u>26,769</u> 30,045	<u>63,441</u> 58,165	<u>28.1%</u> 34.1%
Reduction Goal	—	—	15,046	73,164	17.1%
Met Goal?	—	—	Yes	Yes	Yes
Reductions Beyond Goal	—	—	<u>9,723</u> 14,999	—	—
Per-Capita Emissions	7.3	7.6	—	<u>5.4</u> 5.0	—
Per-Job Emissions	28.5	27.9	—	<u>20.1</u> 18.4	—
Excluded Stationary Source Emissions	7,348	7,781	—	—	—

SOURCE: San Bernardino Associated Governments, *San Bernardino County Regional Greenhouse Gas Reduction Plan*, Draft, Prepared by ICF International (December 2012).

Values may not sum due to rounding.

* The GHG Performance Standard for New Development is not a sector of the inventory, but it provides broad reductions and contributes toward the City's reduction goal by promoting reductions in multiple sectors.

Page 4.7.0-12 (Table 4.7-4)

Table 4.7-4 GHG Reduction Measures and Estimated 2020 Reduced Emissions in Grand Terrace		
Reduction Measure Number	Description	Emissions Reduced
LOCAL MEASURES		
Building Energy		
Energy-1	Energy Efficiency of Existing Buildings	129
Energy-2	Outdoor Lighting	160
Energy-4	Solar Installation for New Housing	63
Water 4 (BE)	Implement SBX 7-7	<u>2,827</u> 8,103
Total Reductions		<u>24,769</u> 30,045

4.2.10 Draft EIR Chapter 4 Section 4.8.0 (Introduction to the Analysis) [City of Hesperia]

Page 4.8-11 (Figure 4.8-2)

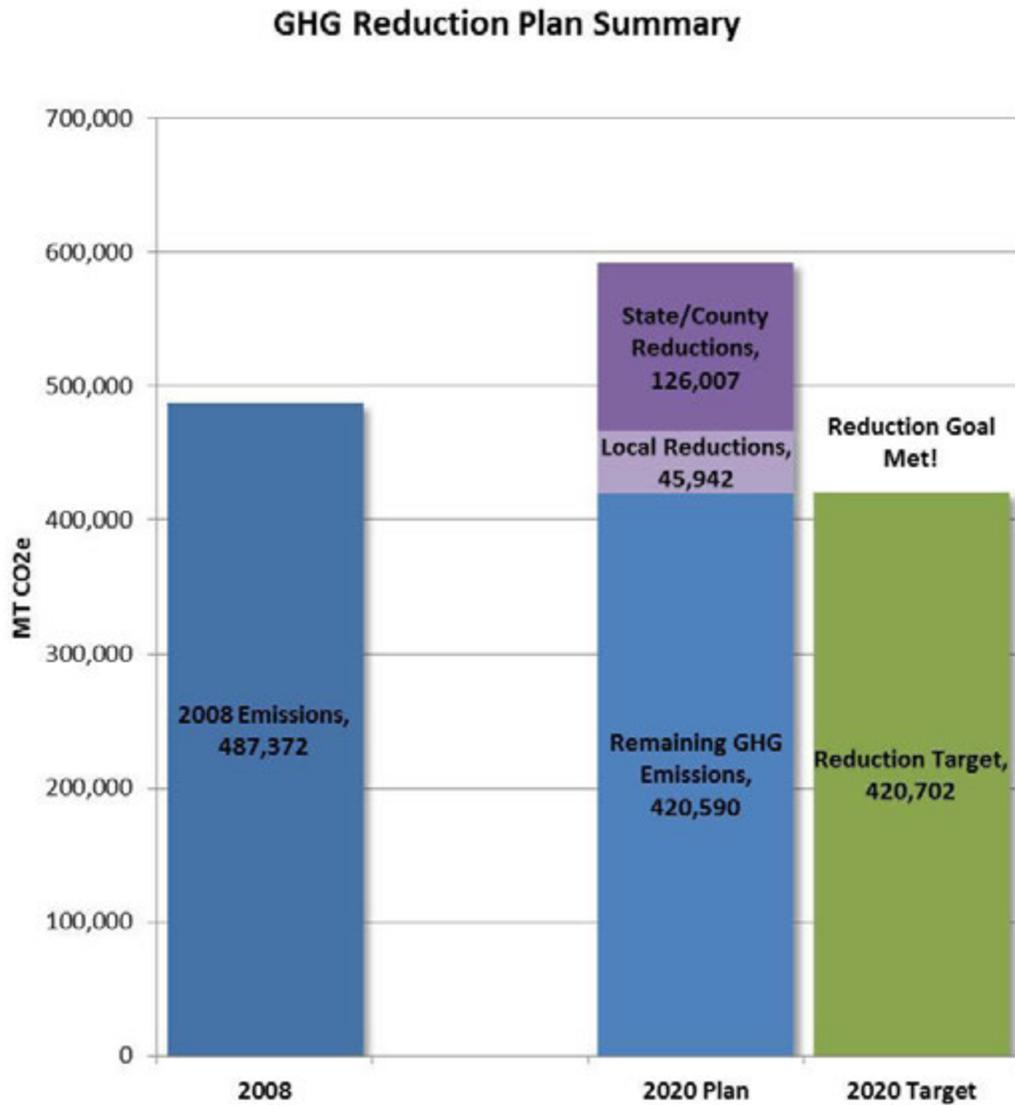


Figure 4.8-2 Emissions Reduction Profile for Hesperia

Page 4.8-12 (Table 4.8-3)

Table 4.8-3 Emission Reduction by Sector for Hesperia					
Sector	2008	2020 BAU	Reductions	2020 Emissions with Plan	% Reduction
Building Energy	175,682	202,584	63,042 62,945	139,652 139,639	31.1%
On-Road Transportation	255,860	314,249	87,282	226,967	27.8%
Off-Road Equipment	27,949	31,045	3,983	27,062	12.8%
Solid Waste Management	7,007	8,858	745	8,113	8.4%
Agriculture	5,572	2,840	0	2,840	0.0%
Wastewater Treatment	3,624	3,995	53	3,942	1.3%
Water Conveyance	11,677	28,968	3,426	25,542	11.8%
GHG Performance Standard*	—	—	13,418 13,420	—	—
Total Emissions	487,372	592,539	171,949 171,854	420,590 420,685	29.0%
Reduction Goal	—	—	171,836	420,702	29.0%
Met Goal?	—	—	Yes	Yes	Yes
Reductions Beyond Goal	—	—	112 47	—	—
Per-Capita Emissions	5.4	6.0	—	4.3	—
Per-Job Emissions	31.4	29.0	—	20.6	—
Excluded Stationary Source Emissions	50,216	71,693	—	—	—

SOURCE: San Bernardino Associated Governments, *San Bernardino County Regional Greenhouse Gas Reduction Plan*, Draft, Prepared by ICF International (December 2012).

Values may not sum due to rounding.

* The GHG Performance Standard for New Development is not a sector of the inventory, but it provides broad reductions and contributes toward the City's reduction goal by promoting reductions in multiple sectors.

Page 4.8-14 (Table 4.8-4)

Table 4.8-4 GHG Reduction Measures and Estimated 2020 Reduced Emissions in Hesperia		
<i>Reduction Measure Number</i>	<i>Description</i>	<i>Emissions Reduced</i>
LOCAL MEASURES		
Building Energy		
Energy-1	Energy Efficiency of Existing Buildings	2,911
Energy-2	Outdoor Lighting	1,447
Energy-4	Solar Installation for New Housing	138
Energy-7	Solar Installation for Existing Housing	442
Energy-8	Solar Installation for Existing Commercial/Industrial	14,012
<i>Water 1 (BE)</i>	<i>Require Tier 1 Voluntary CALGreen Standards for New Construction</i>	<u>283</u> 280
<i>Water 2 (BE)</i>	<i>Renovate Existing Buildings to Achieve Higher Levels of Water Efficiency</i>	<u>2,927</u> 2,832
GHG Performance Standard for New Development		
PS-1	GHG Performance Standard for New Development (30% below Projected BAU emissions for projects)	<u>13,418</u> 13,420
Total Reductions		<u>171,949</u> 171,854

4.2.11 Draft EIR Chapter 4 Section 4.9.0 (Introduction to the Analysis) [City of Highland]

Page 4.9-17 (Figure 4.9-2)

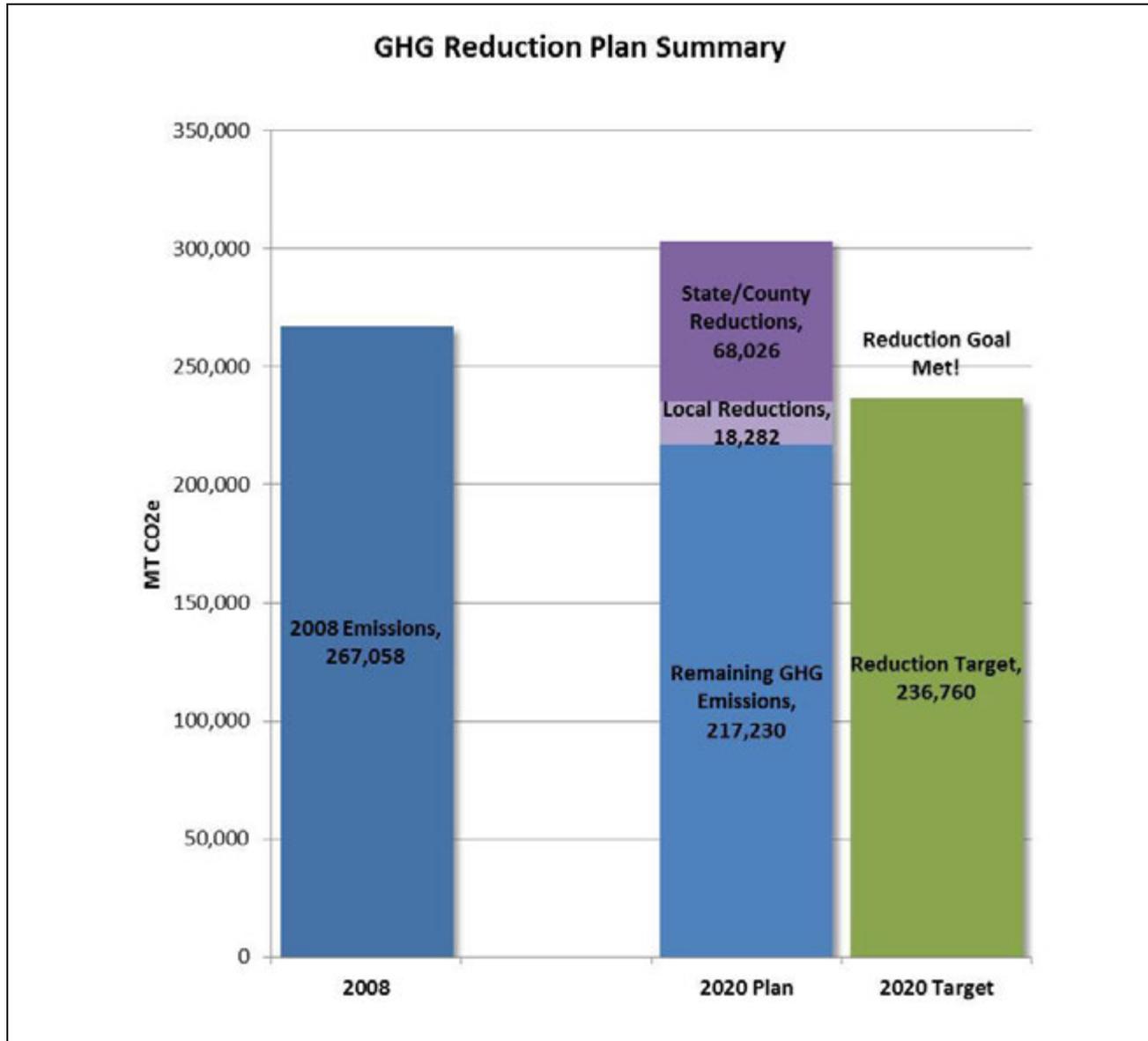


Figure 4.9-2 Emissions Reduction Profile for Highland

Page 4.9-18 (Table 4.9-3)

Table 4.9-3 Emission Reduction by Sector for Highland					
Sector	2008	2020 BAU	Reductions	2020 Emissions with Plan	% Reduction
Building Energy	100,948	120,044	35,119 56,492	84,925 63,852	29.3% 46.8%
On-Road Transportation	133,010	145,050	40,424	104,626	27.9%
Off-Road Equipment	11,736	13,319	1,280	14,040	9.6%
Solid Waste Management	9,533	10,957	3,715	7,242	33.9%
Agriculture	715	364	0	364	0.0%
Wastewater Treatment	2,143	2,387	271	2,116	11.3%
Water Conveyance	8,974	11,417	2,387	9,030	20.9%
GHG Performance Standard*	—	—	3,114	—	—
Total Emissions	267,058	303,538	86,308 407,384	217,230 196,157	28.4% 35.4%
Reduction Goal	—	—	66,778	236,760	22.0%
Met Goal?	—	—	Yes	Yes	Yes
Reductions Beyond Goal	—	—	19,530 40,603	—	—
Per-Capita Emissions	5.0	5.2	—	3.7 3.3	—
Per-Job Emissions	44.2	39.1	—	28.0 25.3	—
Excluded Stationary Source Emissions	15,615	20,364	—	—	—

SOURCE San Bernardino Associated Governments, *San Bernardino County Regional Greenhouse Gas Reduction Plan*, Draft, Prepared by ICF International (December 2012).

Values may not sum due to rounding.

* The GHG Performance Standard for New Development is not a sector of the inventory, but it provides broad reductions and contributes toward the City's reduction goal by promoting reductions in multiple sectors.

Page 4.9-20 (Table 4.9-4)

Table 4.9-4 GHG Reduction Measures and Estimated 2020 Reduced Emissions in Highland		
Reduction Measure Number	Description	Emissions Reduced
LOCAL MEASURES		
Building Energy		
Energy-4	Solar Installation for New Housing	113
Energy-5	Solar Installation for New Commercial	138
Water 4 (BE)	Implement SBX 7-7	11,724 32,807
Total Reductions		86,208 407,384

4.2.12 Draft EIR Chapter 4 Section 4.10.0 (Introduction to the Analysis) [City of Loma Linda]

Page 4.10-21 (Figure 4.10-2)

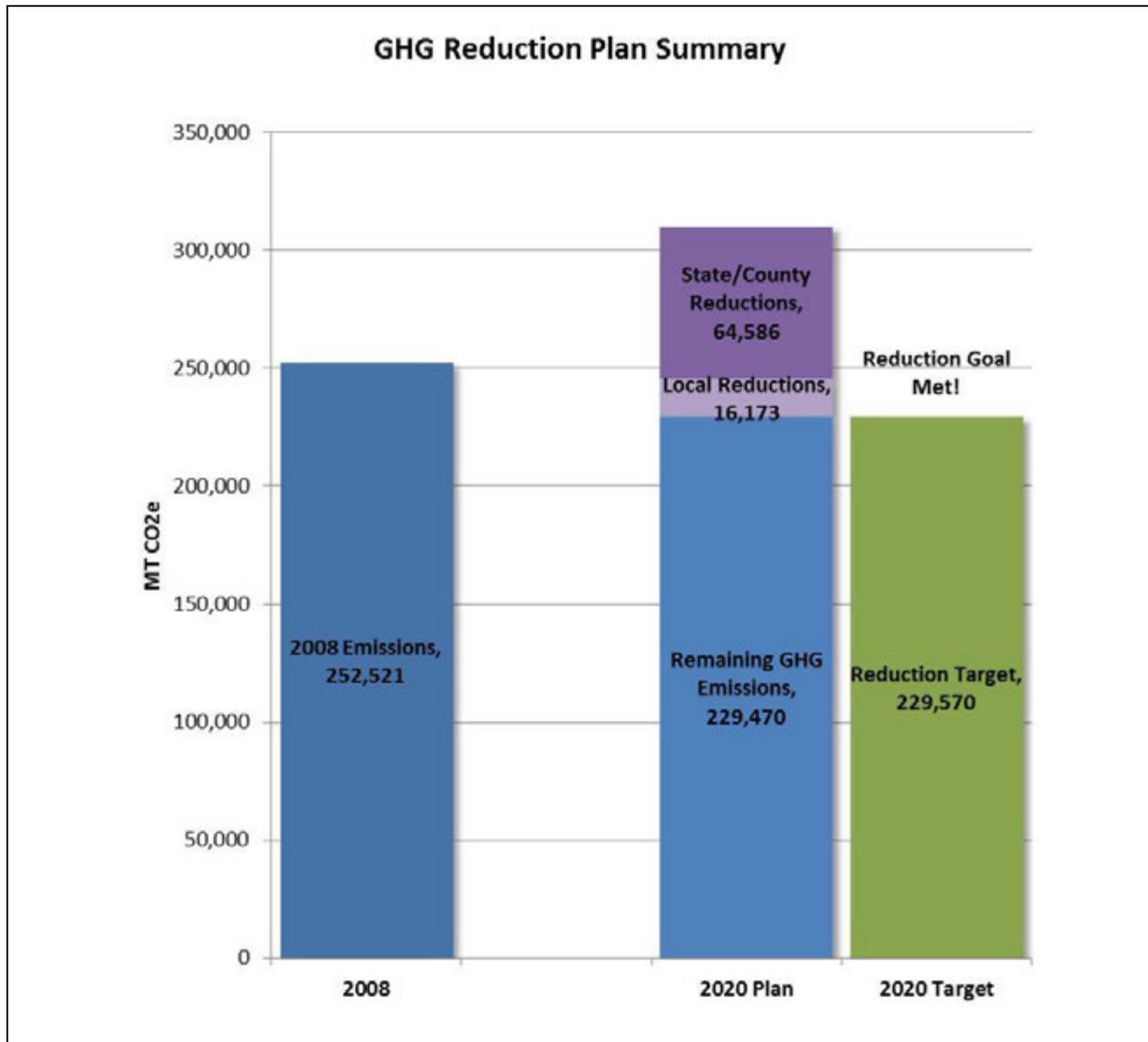


Figure 4.10-2 Emissions Reduction Profile for Loma Linda

Page 4.10-22 (Table 4.10-3)

Table 4.10-3 Emission Reduction by Sector for Loma Linda					
Sector	2008	2020 BAU	Reductions	2020 Emissions with Plan	% Reduction
Building Energy	123,772	157,122	<u>32,524</u> 34,002	<u>125,598</u> 123,120	<u>20.7%</u> 21.6%
On-Road Transportation	111,850	133,966	39,183	94,783	29.2%
Off-Road Equipment	6,747	8,451	993	7,458	11.7%
Solid Waste Management	6,911	6,925	1,614	5,312	23.3%
Agriculture	675	344	0	344	0.0%
Wastewater Treatment	931	1,088	16	1,072	1.5%
Water Conveyance	1,636	2,332	336	1,996	14.4%
GHG Performance Standard*	—	—	<u>6,094</u> 4,590	—	—
Total Emissions	252,521	310,229	<u>80,759</u> 80,734	<u>229,470</u> 229,495	26.0%
Reduction Goal	—	—	80,660	229,570	26.0%
Met Goal?	—	—	Yes	Yes	Yes
Reductions Beyond Goal	—	—	<u>100</u> 75	—	—
Per-Capita Emissions	11.0	11.6	—	8.6	—
Per-Job Emissions	14.4	13.3	—	9.9	—
Excluded Stationary Source Emissions	33,316	45,375	—	—	—

SOURCE: San Bernardino Associated Governments, *San Bernardino County Regional Greenhouse Gas Reduction Plan, Draft*, Prepared by ICF International (December 2012). Values may not sum due to rounding.

*The GHG Performance Standard for New Development is not a sector of the inventory, but it provides broad reductions and contributes toward the City's reduction goal by promoting reductions in multiple sectors.

Page 4.10-24 (Table 4.10-4)

Table 4.10-4 GHG Reduction Measures and Estimated 2020 Reduced Emissions in Loma Linda

<i>Reduction Measure Number</i>	<i>Description</i>	<i>Emissions Reduced</i>
LOCAL MEASURES		
Building Energy		
Energy-1	Energy Efficiency of Existing Buildings	3,965
Energy-2	Outdoor Lighting	141
Energy-3	Green Building Ordinance	4,524
Energy-4	Solar Installation for New Housing	182
Energy-5	Solar Installation for New Commercial	479
Energy-7	Solar Installation for Existing Housing	1987
Energy-8	Solar Installation for Existing Commercial/Industrial	614
<i>LandUse-1 (BE)*</i>	<i>Tree Planting Programs</i>	1
<i>Wastewater-2 (BE)</i>	<i>Equipment Upgrades</i>	275
<i>Water-1 (BE)</i>	<i>Require Tier 1 Voluntary CALGreen Standards for New Construction</i>	<u>223</u> 220
<i>Water-2 (BE)</i>	<i>Renovate Existing Buildings to Achieve Higher Levels of Water Efficiency</i>	<u>772</u> 747
GHG Performance Standard for New Development		
PS-1	GHG Performance Standard for New Development (30% below Projected BAU emissions for projects)	<u>6,094</u> 4,590
Total Reductions		<u>80,759</u> 80,734

4.2.13 Draft EIR Chapter 4 Section 4.11.0 (Introduction to the Analysis) [City of Montclair]

Page 4.11-10 (Figure 4.11-2)

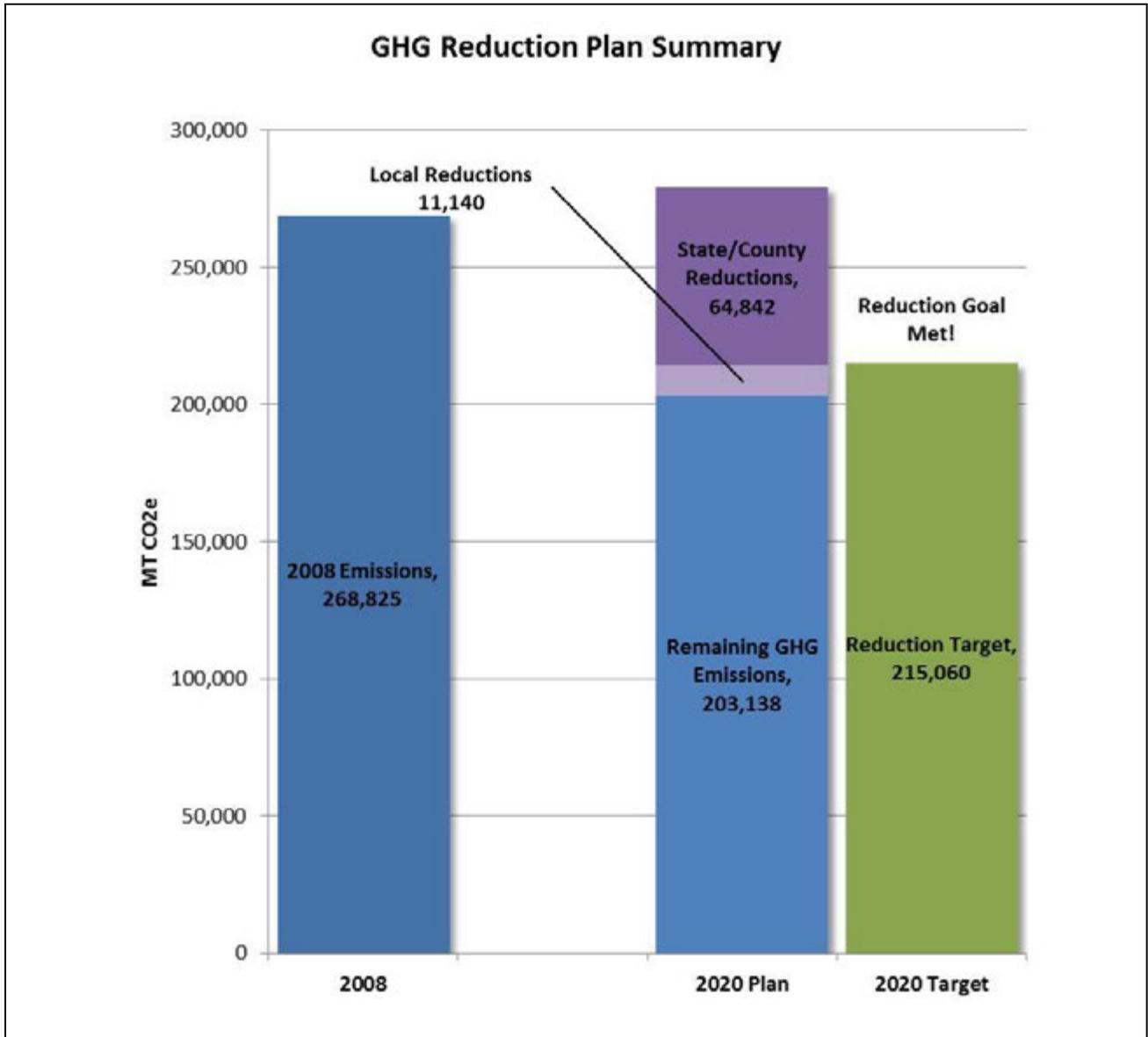


Figure 4.11-2 Emissions Reduction Profile for Montclair

Page 4.11-10 (Table 4.11-3)

Table 4.11-3 Emission Reduction by Sector for Montclair					
Sector	2008	2020 BAU	Reductions	2020 Emissions with Plan	% Reduction
Building Energy	87,088	93,284	<u>25,433</u> 35,664	<u>67,851</u> 57,620	<u>27.3%</u> 38.2%
On-Road Transportation	144,013	145,119	41,393	103,726	28.5%
Off-Road Equipment	16,474	17,917	1,782	16,135	9.9%
Solid Waste Management	10,108	9,873	5,096	4,777	51.6%
Agriculture	0	0	0	0	0.0%
Wastewater Treatment	1,455	1,614	121	1,494	7.5%
Water Conveyance	9,687	11,313	1,480	9,833	13.1%
GHG Performance Standard*	—	—	<u>678</u> 325	—	—
Total Emissions	268,825	279,120	<u>75,982</u> 85,864	<u>203,138</u> 193,260	<u>27.2%</u> 30.8%
Reduction Goal	—	—	64,061	215,060	23.0%
Met Goal?	—	—	Yes	Yes	Yes
Reductions Beyond Goal	—	—	<u>11,922</u> 21,800	—	—
Per-Capita Emissions	7.5	7.0	—	<u>5.1</u> 4.9	—
Per-Job Emissions	16.3	16.4	—	<u>11.9</u> 11.3	—
Excluded Stationary Source Emissions	42,224	45,753	—	—	—

SOURCE: San Bernardino Associated Governments, *San Bernardino County Regional Greenhouse Gas Reduction Plan*, Draft, Prepared by ICF International (December 2012). Values may not sum due to rounding.

* The GHG Performance Standard for New Development is not a sector of the inventory, but it provides broad reductions and contributes toward the City's reduction goal by promoting reductions in multiple sectors.

Page 4.11-12 (Table 4.11-4)

Table 4.11-4 GHG Reduction Measures and Estimated 2020 Reduced Emissions in Montclair		
<i>Reduction Measure Number</i>	<i>Description</i>	<i>Emissions Reduced</i>
LOCAL MEASURES		
Building Energy		
Energy-2	Outdoor Lighting	547
Energy-3	Green Building Ordinance	353.0
Energy-4	Solar Installation for New Housing	187
Water-4 (BE)	Implement SBX 7-7	<u>4,032</u> 15,113
GHG Performance Standard for New Development		
PS-1	GHG Performance Standard for New Development (30% below Projected BAU emissions for projects)	<u>678</u> 325
Total Reductions		<u>74,780</u> 85,861

4.2.14 Draft EIR Chapter 4 Section 4.12.0 (Introduction to the Analysis) [City of Needles]

Page 4.12.0-8 (Table 4.12-3)

Table 4.12-3 Emission Reduction by Sector for Needles					
Sector	2008	2020 BAU	Reductions	2020 Emissions with Plan	% Reduction
Building Energy	35,864	35,232	12,669 12,685	22,563 22,547	36.0%
On-Road Transportation	35,135	35,468	8,402	27,066	23.7%
Off-Road Equipment	2,549	2,587	300	2,287	11.6%
Solid Waste Management	3,915	3,989	49	3,940	1.2%
Agriculture	0	0	0	0	0.0%
Wastewater Treatment	196	201	101	101	50.0%
Water Conveyance	999	1,019	14	1,005	1.4%
GHG Performance Standard*	—	—	227	—	—
<i>Total Emissions</i>	78,759	78,496	21,556	56,939	27.5%
Reduction Goal	—	—	11,550	66,946	14.7%
Met Goal?	—	—	Yes	Yes	Yes
<i>Reductions Beyond Goal</i>	—	—	10,006	—	—
Per-Capita Emissions	16.3	15.9	—	11.5	—
Per-Job Emissions	23.7	25.0	—	18.1	—
Excluded Stationary Source Emissions	7,319	7,807	—	—	—

SOURCE: San Bernardino Associated Governments, *San Bernardino County Regional Greenhouse Gas Reduction Plan*, Draft, Prepared by ICF International (December 2012).

Values may not sum due to rounding.

* The GHG Performance Standard for New Development is not a sector of the inventory, but it provides broad reductions and contributes toward the City's reduction goal by promoting reductions in multiple sectors.

Page 4.12.0-10 (Table 4.12-4)

Table 4.12-4 GHG Reduction Measures and Estimated 2020 Reduced Emissions in Needles		
<i>Reduction Measure Number</i>	<i>Description</i>	<i>Emissions Reduced</i>
LOCAL MEASURES		
Building Energy		
Energy-1	Energy Efficiency of Existing Buildings	671
Energy-2	Outdoor Lighting	119
Energy-3	Green Building Ordinance	46
Energy-4	Solar Installation for New Housing	4
Energy-5	Solar Installation for New Commercial	3
Energy-7	Solar Installation for Existing Housing	345
Energy-8	Solar Installation for Existing Commercial/Industrial	32
Energy-9	Co-Generation Facilities	0.1
GHG Performance Standard for New Development		
PS-1	GHG Performance Standard for New Development (30% below Projected BAU emissions for projects)	<u>722</u>
Total Reductions		21,556

4.2.15 Draft EIR Chapter 4 Section 4.13.0 (Introduction to the Analysis) [City of Ontario]

Page 4.13.0-17 (Figure 4.13-2)

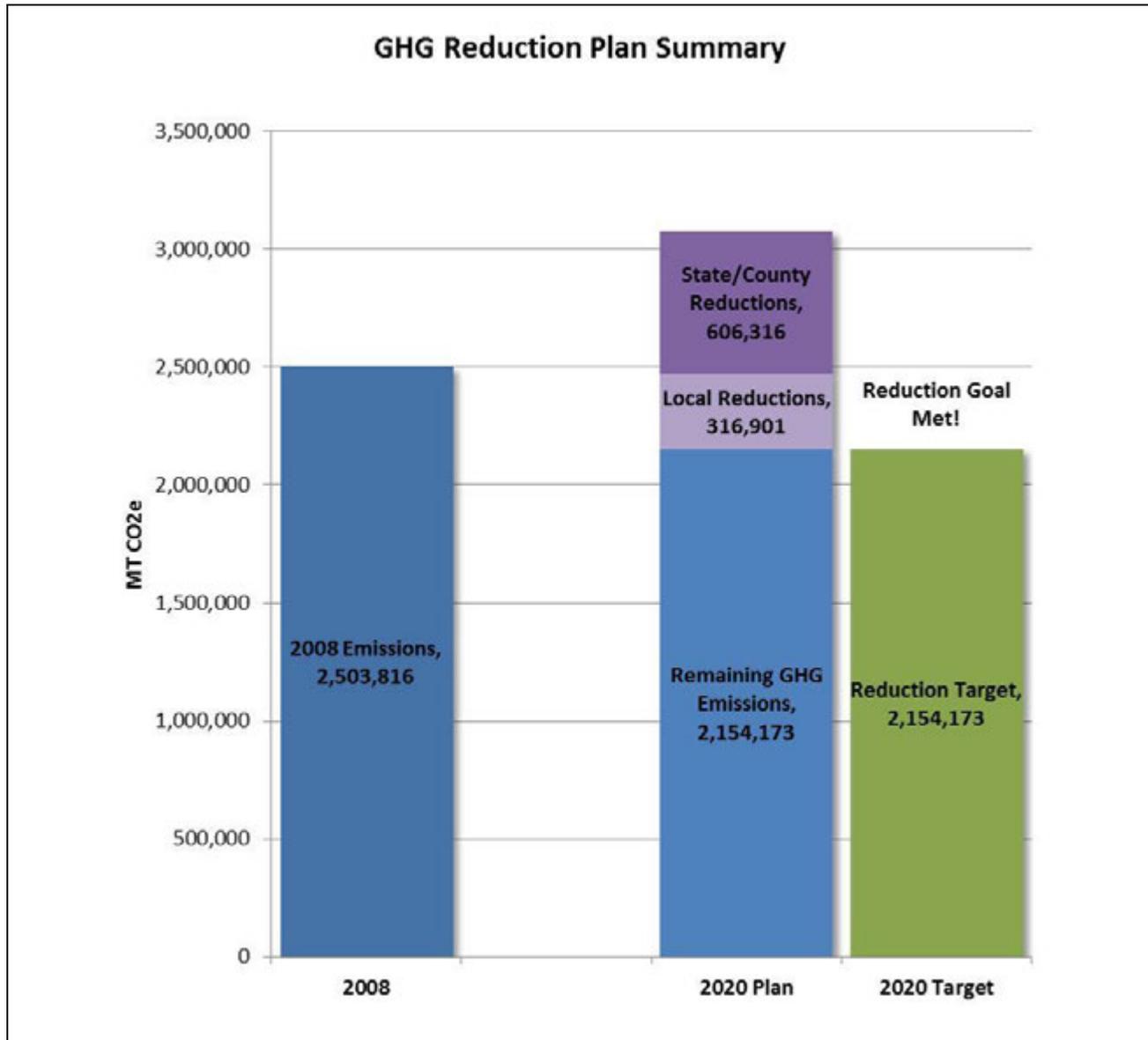


Figure 4.13-2 Emissions Reduction Profile for Ontario

Page 4.13.0-18 (Table 4.13-3)

Table 4.13-3 Emission Reduction by Sector for Ontario					
Sector	2008	2020 BAU	Reductions	2020 Emissions with Plan	% Reduction
Building Energy	933,718	1,244,079	<u>417,329</u> 446,307	<u>826,749</u> 797,772	<u>33.5%</u> 35.9%
On-Road Transportation	942,020	1,169,171	308,445	860,726	26.4%
Off-Road Equipment	176,314	229,069	36,130	192,939	15.8%
Solid Waste Management	60,000	64,326	26,265	38,061	40.8%
Agriculture	356,131	323,390	79,939	243,450	24.7%
Wastewater Treatment	6,587	8,781	534	8,247	6.1%
Water Conveyance	29,044	38,575	7,252	31,323	18.8%
GHG Performance Standard*	—	—	28,882	—	—
<u>Additional Reductions**</u>	<u>—</u>	<u>—</u>	<u>17,440</u>	<u>—</u>	<u>—</u>
Total Emissions	2,503,816	3,077,390	<u>923,217</u> 934,754	<u>2,154,173</u> 2,142,636	<u>30.0%</u> 30.4%
Reduction Goal	—	—	923,217	2,154,173	30.0%
Met Goal?	—	—	Yes	Yes	Yes
Reductions Beyond Goal	—	—	<u>0</u> 11,537	—	—
Per-Capita Emissions	15.4	14.3	—	<u>10.0</u> 9.9	—
Per-Job Emissions	21.9	20.3	—	14.2	—
Excluded Stationary Source Emissions	405,195	511,548	—	—	—

SOURCE: San Bernardino Associated Governments, *San Bernardino County Regional Greenhouse Gas Reduction Plan, Draft*, Prepared by ICF International (December 2012).

Values may not sum due to rounding.

* The GHG Performance Standard for New Development is not a sector of the inventory, but it provides broad reductions and contributes toward the City's reduction goal by promoting reductions in multiple sectors.

** Ontario has been customizing its Climate Action Plan to reflect specific City conditions and making some adjustments to individual measures. When applying these city-specific adjustments, the Ontario CAP would meet (and likely exceed) its goal. Thus, the totals for Ontario were adjusted to reflect to the City meeting its goal. Ontario's Climate Action Plan will be released in 2014 and will describe the City-level analysis demonstrating that it will meet its goal.

Page 4.13.0-21 (Table 4.13-4)

Table 4.13-4 GHG Reduction Measures and Estimated 2020 Reduced Emissions in Ontario

<i>Reduction Measure Number</i>	<i>Description</i>	<i>Emissions Reduced</i>
LOCAL MEASURES		
Building Energy		
Energy-1	Energy Efficiency of Existing Buildings	24,928
Energy-2	Outdoor Lighting	2,195
Energy-4	Solar Installation for New Housing	3,244
Energy-5	Solar Installation for New Commercial	18,018
Energy-6	Solar Installation for Warehouse Space	60,635
Energy-7	Solar Installation for Existing Housing	9,760
Energy-8	Solar Installation for Existing Commercial/Industrial	10,287
<i>LandUse-1 (BE)</i>	<i>Tree Planting Programs</i>	14
<i>Wastewater-2 (BE)</i>	<i>Equipment Upgrades</i>	2,832
<i>Water 2 (BE)</i>	<i>Renovate Existing Buildings to Achieve Higher Levels of Water Efficiency</i>	<u>5,609</u> 5,427
<i>Water 4 (BE)</i>	<i>Implement SBX 7-7</i>	<u>16,461</u> 45,624
<u>Other Reductions</u>	<u>Additional Reductions Achieved by the Ontario CAP*</u>	<u>17,440</u>
Total Reductions		<u>923,217</u> 934,754

* Ontario has been customizing its Climate Action Plan to reflect specific City conditions and making some adjustments to individual measures. When applying these city-specific adjustments, the Ontario CAP would meet (and likely exceed) its goal. Thus, the total for Ontario were adjusted to reflect the more precise City-level calculations showing the City meeting its goal

4.2.16 Draft EIR Chapter 4 Section 4.14.0 (Introduction to the Analysis) [City of Rancho Cucamonga]

Page 4.14.0-12 (Figure 4.14-2)

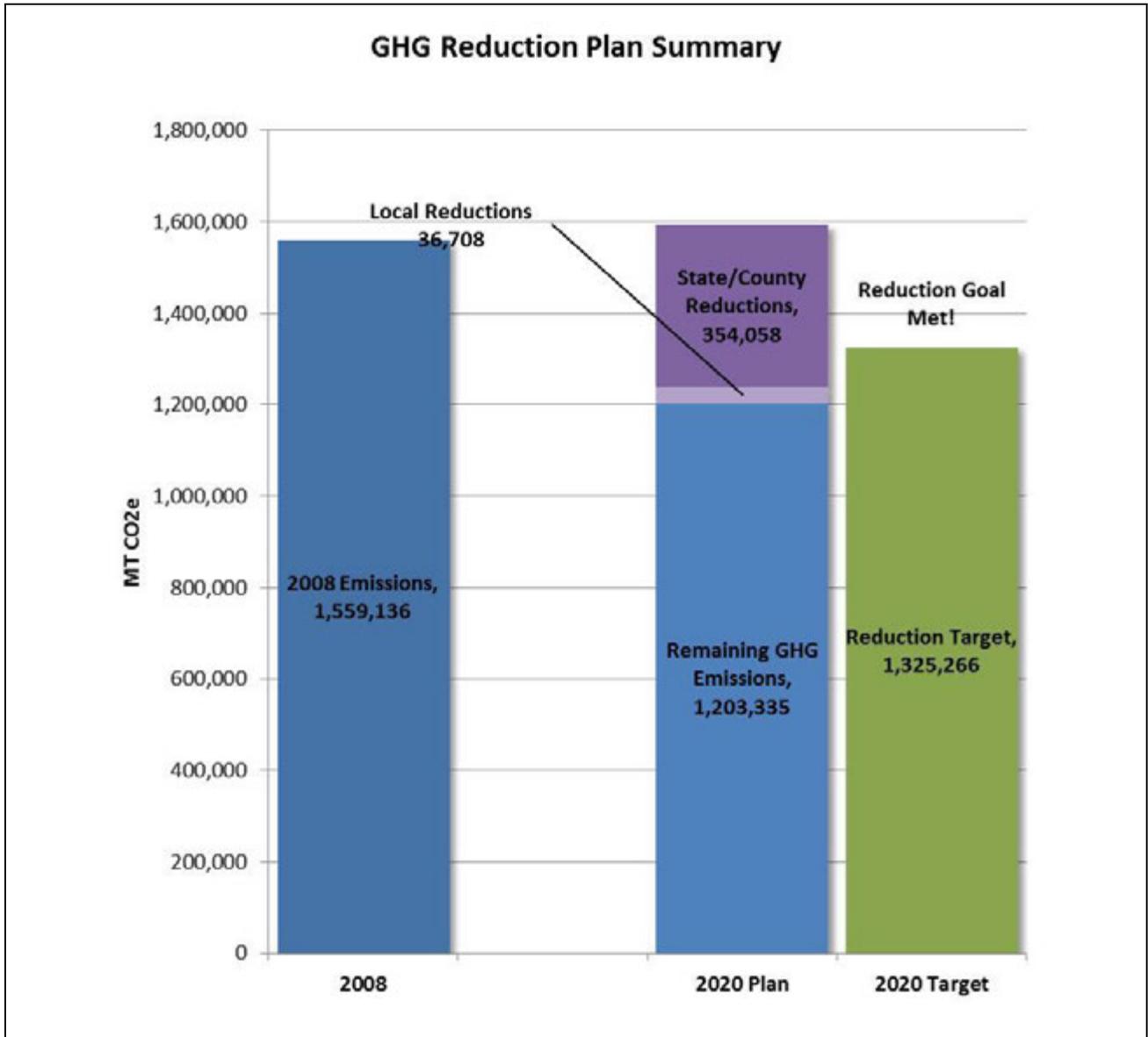


Figure 4.14-2 Emissions Reduction Profile for Rancho Cucamonga

Page 4.14.0-13 (Table 4.14-3)

Table 4.14-3 Emission Reduction by Sector for Rancho Cucamonga					
Sector	2008	2020 BAU	Reductions	2020 Emissions with Plan	% Reduction
Building Energy	693,422	722,126	164,946 490,187	557,180 531,939	22.8% 26.3%
On-Road Transportation	702,904	701,998	196,212	505,786	28.0%
Off-Road Equipment	80,830	82,950	7,411	75,539	8.9%
Solid Waste Management	29,042	29,475	14,426	15,049	48.9%
Agriculture	300	153	0	153	0.0%
Wastewater Treatment	6,584	6,801	242	6,559	3.6%
Water Conveyance	46,054	50,598	7,529	43,069	14.9%
GHG Performance Standard*	—	—	0	—	—
Total Emissions	1,559,136	1,594,101	390,766 416,007	1,203,335 1,178,094	24.5% 26.1%
Reduction Goal	—	—	268,835	1,325,266	16.9%
Met Goal?	—	—	Yes	Yes	Yes
Reductions Beyond Goal	—	—	121,931 147,172	—	—
Per-Capita Emissions	9.6	9.5	—	7.2 7.0	—
Per-Job Emissions	25.0	25.0	—	18.8 18.4	—
Excluded Stationary Source Emissions	162,41	171,551	—	—	—

SOURCE: San Bernardino Associated Governments, *San Bernardino County Regional Greenhouse Gas Reduction Plan*, Draft, Prepared by ICF International (December 2012).

Values may not sum due to rounding.

* The GHG Performance Standard for New Development is not a sector of the inventory, but it provides broad reductions and contributes toward the City's reduction goal by promoting reductions in multiple sectors.

Page 4.14.0-15 (Table 4.14-4)

Table 4.14-4 GHG Reduction Measures and Estimated 2020 Reduced Emissions in Rancho Cucamonga		
<i>Reduction Measure Number</i>	<i>Description</i>	<i>Emissions Reduced</i>
LOCAL MEASURES		
Building Energy		
Energy-1	Energy Efficiency of Existing Buildings	469
Energy-3	Green Building Ordinance	522
Energy-4	Solar Installation for New Housing	84
Energy-5	Solar Installation for New Commercial	373
Energy-6	Solar Installation for Warehouse Space	2,725
Energy-7	Solar Installation for Existing Housing	665
Energy-8	Solar Installation for Existing Commercial/Industrial	300
Energy-9	Co-Generation Facilities	73
LandUse-1	Tree Planting	91
Wastewater-2 (BE)	Equipment Upgrades	3,724
Water-1 (BE)	Require Tier 1 Voluntary CALGreen Standards for New Construction	<u>156,454</u>
Water-4 (BE)	Implement SBX 7-7	<u>13,304</u> 38,034
Total Reductions		<u>390,766</u> 416,007

4.2.17 Draft EIR Chapter 4 Section 4.15.0 (Introduction to the Analysis) [City of Redlands]

Page 4.15.0-12 (Figure 4.15-2)

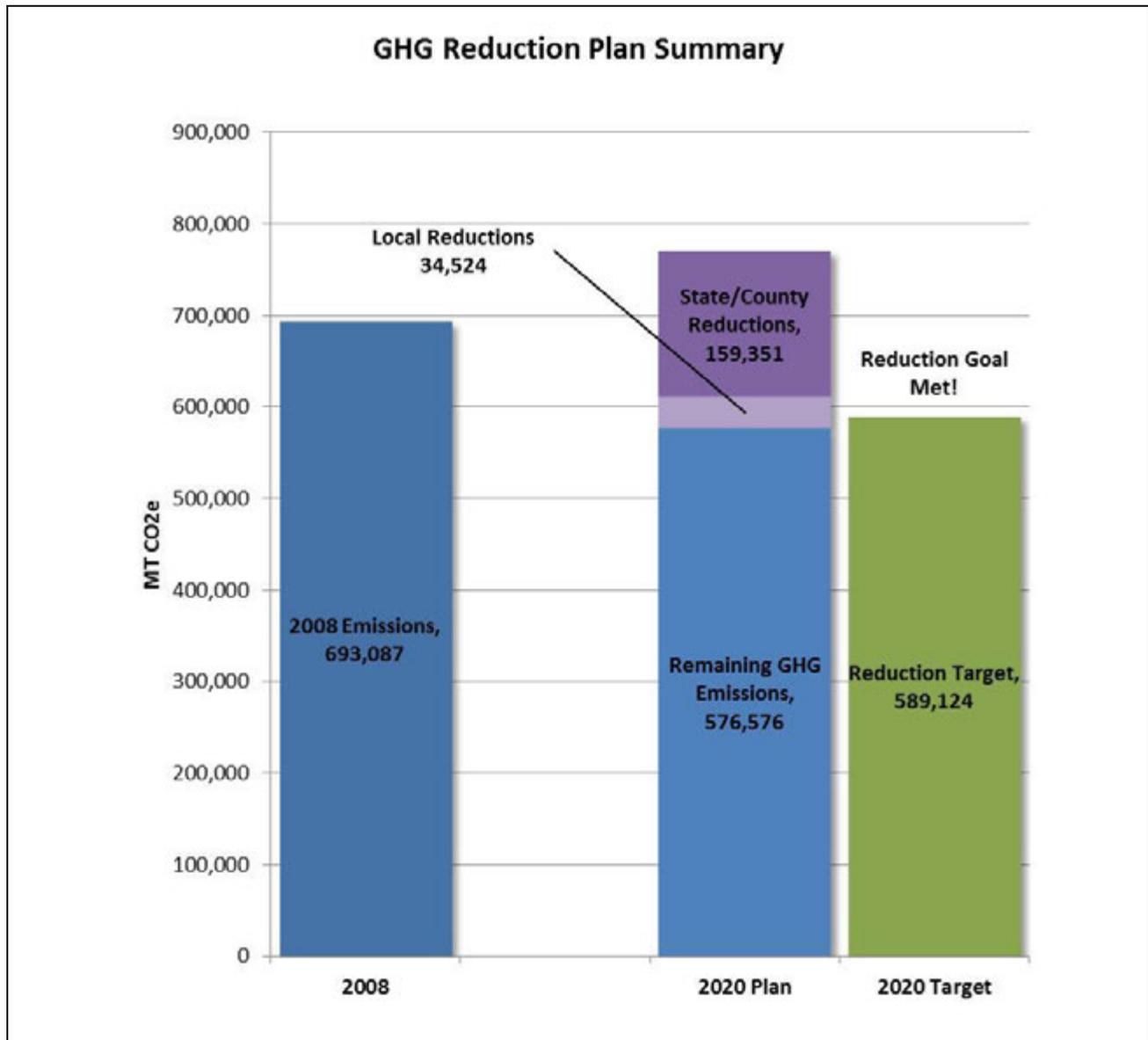


Figure 4.15-2 Emissions Reduction Profile for Redlands

Page 4.15.0-13 (Table 4.15-3)

Table 4.15-3 Emission Reduction by Sector for Redlands					
Sector	2008	2020 BAU	Reductions	2020 Emissions with Plan	% Reduction
Building Energy	302,160	342,534	<u>87,001</u> 133,576	<u>255,533</u> 208,958	<u>25.4%</u> 39.0%
On-Road Transportation	319,157	349,518	98,342	251,176	28.1%
Off-Road Equipment	30,147	33,528	<u>2,995</u> 3,496	<u>30,532</u> 30,034	<u>8.9%</u> 40.4%
Solid Waste Management	16,391	17,877	<u>96</u> 6,680	<u>17,781</u> 11,197	<u>0.5%</u> 37.4%
Agriculture	3,298	1,681	0	1,681	0.0%
Wastewater Treatment	2,773	3,072	<u>345</u> 278	<u>2,727</u> 2,794	<u>11.2%</u> 9.0%
Water Conveyance	19,161	22,242	<u>5,097</u> 4,772	<u>17,146</u> 17,470	<u>22.9</u> 24.5%
GHG Performance Standard*	—	—	<u>0</u> 4,780	—	—
Total Emissions	693,087	770,452	<u>193,876</u> 251,924	<u>576,576</u> 518,528	<u>25.2%</u> 32.7%
Reduction Goal	—	—	181,328	589,124	23.5%
Met Goal?	—	—	Yes	Yes	Yes
Reductions Beyond Goal	—	—	<u>12,548</u> 70,596	—	—
Per-Capita Emissions	10.1	10.2	—	<u>7.6</u> 6.9	—
Per-Job Emissions	16.7	16.5	—	<u>12.4</u> 11.1	—
Excluded Stationary Source Emissions	92,324	109,197	—	—	—

SOURCE: San Bernardino Associated Governments, *San Bernardino County Regional Greenhouse Gas Reduction Plan*, Draft, Prepared by ICF International (December 2012). Values may not sum due to rounding.

* The GHG Performance Standard for New Development is not a sector of the inventory, but it provides broad reductions and contributes toward the City's reduction goal by promoting reductions in multiple sectors.

Page 4.15.0-15 (Table 4.15-4)

Table 4.15-4 GHG Reduction Measures and Estimated 2020 Reduced Emissions in Redlands		
Reduction Measure Number	Description	Emissions Reduced
LOCAL MEASURES		
Building Energy		
<i>Water-4 (BE)</i>	<i>Implement SB X 7-7</i>	<u>25,527</u> 74,769
Total Reductions		<u>193,876</u> 243,117

4.2.18 Draft EIR Chapter 4 Section 4.16.0 (Introduction to the Analysis) [City of Rialto]

Page 4.16.0-14 (Figure 4.16-2)

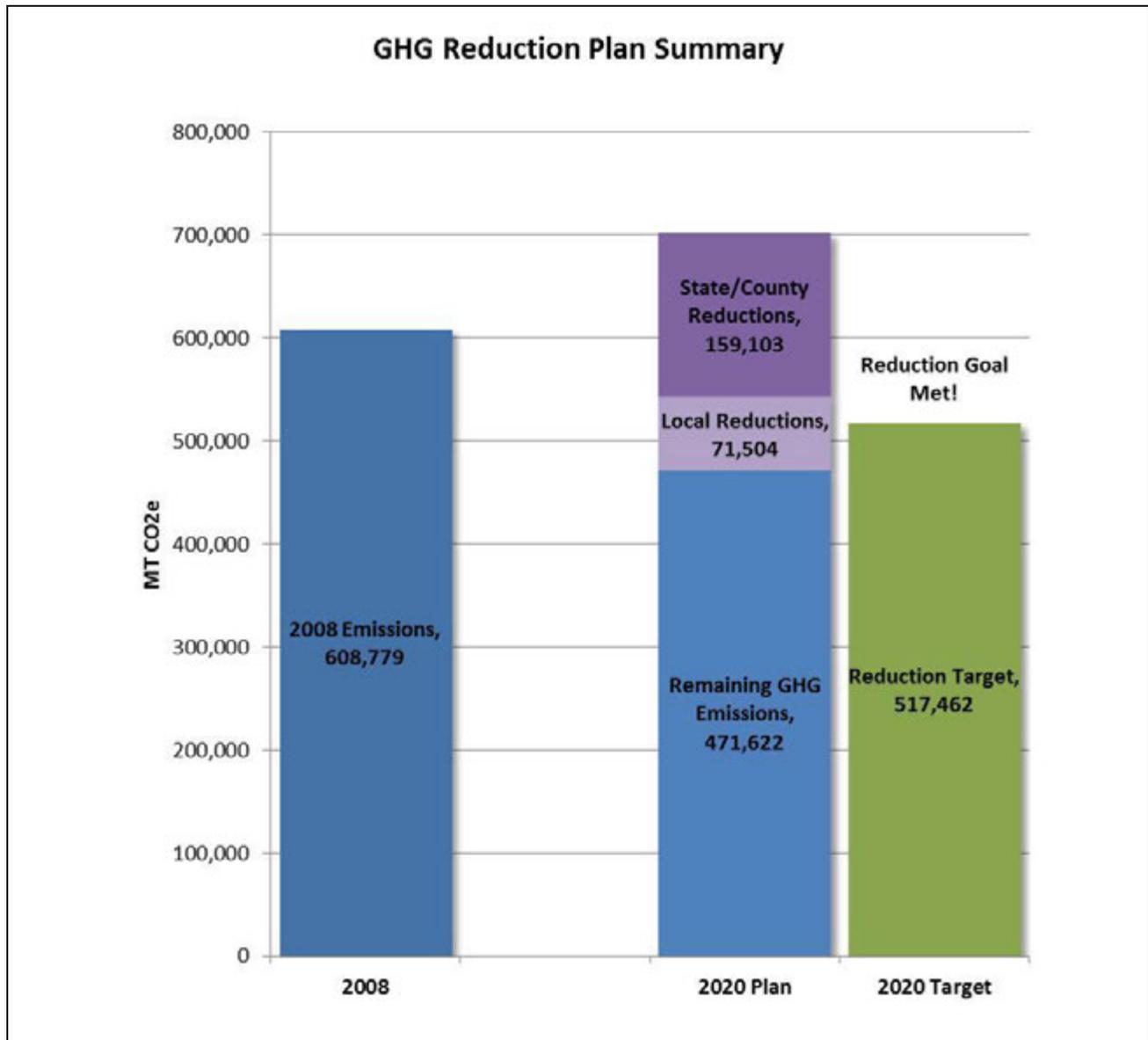


Figure 4.16-2 Emissions Reduction Profile for Rialto

Page 4.16.0-15 (Table 4.16-3)

Table 4.16-3 Emission Reduction by Sector for Rialto					
Sector	2008	2020 BAU	Reductions	2020 Emissions with Plan	% Reduction
Building Energy	233,905	271,828	<u>104,446</u> 451,903	<u>167,383</u> 419,925	<u>38.4%</u> 55.9%
On-Road Transportation	302,001	326,257	90,195	236,062	27.6%
Off-Road Equipment	40,061	44,508	7,611	36,897	17.1%
Solid Waste Management	14,269	15,708	11,807	3,901	75.2%
Agriculture	245	125	0	125	0.0%
Wastewater Treatment	4,001	4,476	419	4,056	9.4%
Water Conveyance	14,297	39,327	8,687	30,640	22.1%
GHG Performance Standard*	—	—	<u>7,442</u> 6,557	—	—
Total Emissions	608,779	702,229	<u>230,607</u> 277,179	<u>471,622</u> 425,050	<u>32.8%</u> 39.5%
Reduction Goal	—	—	184,766	517,462	26.3%
Met Goal?	—	—	Yes	Yes	Yes
Reductions Beyond Goal	—	—	<u>45,840</u> 92,413	—	—
Per-Capita Emissions	6.2	6.4	—	<u>4.3</u> 3.9	—
Per-Job Emissions	26.6	26.6	—	<u>17.8</u> 16.1	—
Excluded Stationary Source Emissions	67,952	80,427	—	—	—

SOURCE San Bernardino Associated Governments, *San Bernardino County Regional Greenhouse Gas Reduction Plan*, Draft, Prepared by ICF International (December 2012).

Values may not sum due to rounding.

* The GHG Performance Standard for New Development is not a sector of the inventory, but it provides broad reductions and contributes toward the City's reduction goal by promoting reductions in multiple sectors.

Page 4.16.0-18 (Table 4.16-4)

Table 4.16-4 GHG Reduction Measures and Estimated 2020 Reduced Emissions in Rialto		
<i>Reduction Measure Number</i>	<i>Description</i>	<i>Emissions Reduced</i>
LOCAL MEASURES		
Building Energy		
Energy-1	Energy Efficiency of Existing Buildings	1,601
Energy-3	Green Building Ordinance	987
Energy-4	Solar Installation for New Housing	842
Energy-5	Solar Installation for New Commercial	1,573
Energy-6	Solar Installation for Warehouse Space	11,547
Energy-7	Solar Installation for Existing Housing	3,283
Energy-8	Solar Installation for Existing Commercial/Industrial	1,963
Energy-9	Co-Generation Facilities	24
<i>LandUse-1 (BE)</i>	<i>Tree Planting</i>	<i>1</i>
<i>Wastewater-2 (BE)</i>	<i>Equipment Upgrades</i>	<i>3,526</i>
<i>Water-1 (BE)</i>	<i>Require Tier 1 Voluntary CALGreen Standards for New Construction</i>	<i>3</i>
<i>Water-4 (BE)</i>	<i>Implement SBX 7-7</i>	<i><u>23,570</u> 70,442</i>
GHG Performance Standard for New Development		
PS-1	GHG Performance Standard for New Development (30% below Projected BAU emissions for projects)	<u>7,442</u> 6,557
Total Reductions		<u>230,607</u> 277,179

4.2.19 Draft EIR Chapter 4 Section 4.17.0 (Introduction to the Analysis) [City of San Bernardino]

Page 4.17.0-17 (Figure 4.17-2)

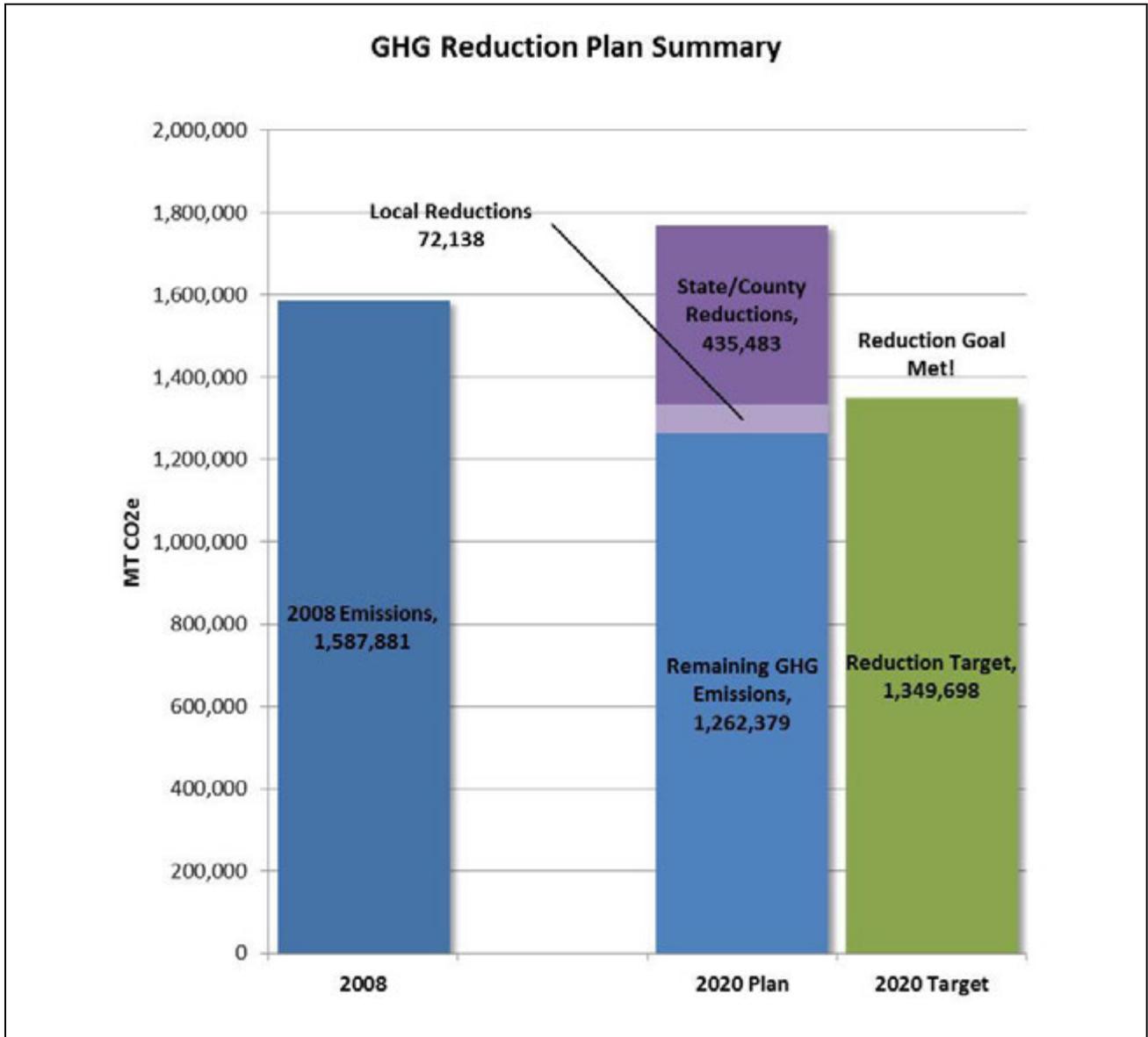


Figure 4.17-2 Emissions Reduction Profile for San Bernardino

Page 4.17.0-18 (Table 4.17-3)

Table 4.17-3 Emission Reduction by Sector for San Bernardino					
Sector	2008	2020 BAU	Reductions	2020 Emissions with Plan	% Reduction
Building Energy	578,446	649,824	166,904 170,938	482,920 478,886	25.7% 26.3%
On-Road Transportation	810,557	891,216	250,578	640,638	28.1%
Off-Road Equipment	96,602	100,337	18,455	81,882	18.4%
Solid Waste Management	66,492	72,386	48,520	23,668	67.0%
Agriculture 356	1,909	973	0	973	0.0%
Wastewater Treatment 6	8,490	9,407	176	9,231	1.9%
Water Conveyance 29	25,365	45,858	2,939	42,919	6.4%
GHG Performance Standard*	—	—	20,049	—	—
Total Emissions	1,587,881	1,770,000	507,621 511,655	1,262,379 1,258,345	28.7% 28.9%
Reduction Goal	—	—	420,302	1,349,698	23.7%
Met Goal?	—	—	Yes	Yes	Yes
Reductions Beyond Goal	—	—	87,319 91,353	—	—
Per-Capita Emissions	7.6	7.7	—	5.5 5.4	—
Per-Job Emissions	15.7	15.6	—	11.1	—
Excluded Stationary Source Emissions	322,801	301,927	—	—	—

SOURCE: San Bernardino Associated Governments, *San Bernardino County Regional Greenhouse Gas Reduction Plan*, Draft, Prepared by ICF International (December 2012).

Values may not sum due to rounding.

* The GHG Performance Standard for New Development is not a sector of the inventory, but it provides broad reductions and contributes toward the City's reduction goal by promoting reductions in multiple sectors.

Page 4.17.0-10 (Table 4.17-4)

Table 4.17-4 GHG Reduction Measures and Estimated 2020 Reduced Emissions in San Bernardino		
<i>Reduction Measure Number</i>	<i>Description</i>	<i>Emissions Reduced</i>
LOCAL MEASURES		
Building Energy		
Energy-1	Energy Efficiency of Existing Buildings	10,324 ₇
Energy-4	Solar Installation for New Housing	310 ₇
Energy-5	Solar Installation for New Commercial	980
Energy-6	Solar Installation for Warehouse Space	1,836
Energy-7	Solar Installation for Existing Housing	3,176
Energy-8	Solar Installation for Existing Commercial/Industrial	1,183
<i>LandUse-1 (BE)</i>	<i>Tree Planting Programs</i>	149
<i>Wastewater-2 (BE)</i>	<i>Equipment Upgrades</i>	2,447
Water-2 (BE)	Renovate Existing Buildings to Achieve Higher Levels of Water Efficiency	<u>6,868</u> 6,644
Water-4 (BE)	Implement SBX 7-7	<u>2,501</u> 6,758
Total Reductions		<u>507,621</u> 511,655

4.2.20 Draft EIR Chapter 4 Section 4.18.0 (Introduction to the Analysis [City of Twentynine Palms])

Page 4.18.0-16 (Figure 4.18-2)

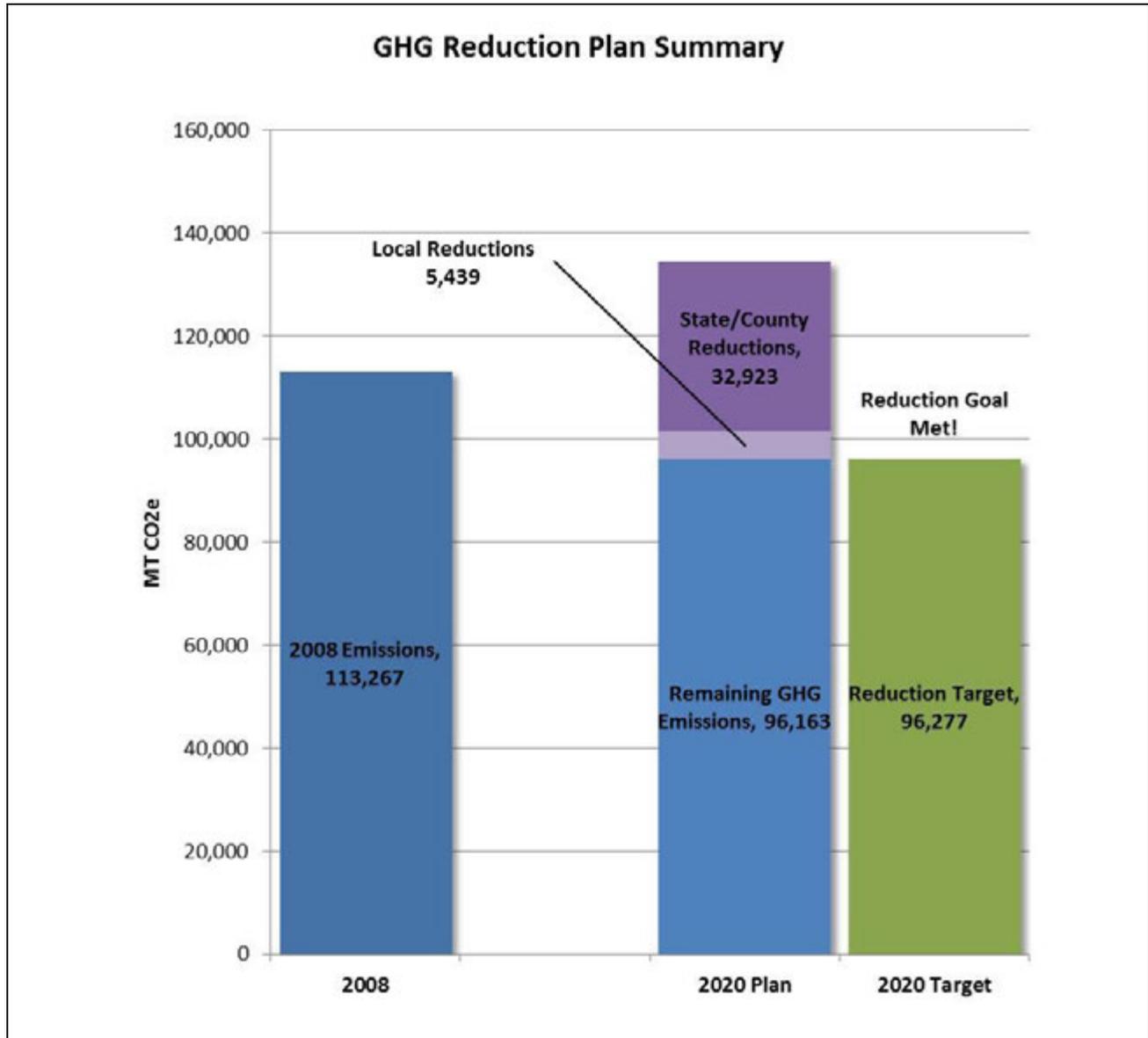


Figure 4.18-2 Emissions Reduction Profile for Twentynine Palms

Page 4.18.0-17 (Table 4.18-3)

Table 4.18-3 Emission Reduction by Sector for Twentynine Palms					
Sector	2008	2020 BAU	Reductions	2020 Emissions with Plan	% Reduction
Building Energy	34,430	40,471	<u>11,490</u> 11,672	<u>28,981</u> 28,799	<u>28.4%</u> 28.8%
On-Road Transportation	59,176	69,737	18,526	51,211	26.6%
Off-Road Equipment	5,494	6,443	771	5,671	12.0%
Solid Waste Management	6,862	9,640	5,195	4,445	53.9%
Agriculture	0	0	0	0	0.0%
Wastewater Treatment	4,991	5,919	142	5,777	2.4%
Water Conveyance	2,314	2,314	72	2,242	3.1%
GHG Performance Standard*	—	—	<u>2,165</u> 1,957	—	—
Total Emissions	113,267	134,524	<u>38,361</u> 38,335	<u>96,163</u> 96,189	28.5%
Reduction Goal	—	—	38,247	96,277	28.4%
Met Goal?	—	—	Yes	Yes	Yes
Reductions Beyond Goal	—	—	<u>115</u> 88	—	—
Per-Capita Emissions	4.5	4.6	—	3.3	—
Per-Job Emissions	35.3	37.1	—	26.5	—
Excluded Stationary Source Emissions	10,952	12,425	—	—	—

SOURCE: San Bernardino Associated Governments, *San Bernardino County Regional Greenhouse Gas Reduction Plan*, Draft, Prepared by ICF International (December 2012).

Values may not sum due to rounding.

* The GHG Performance Standard for New Development is not a sector of the inventory, but it provides broad reductions and contributes toward the City's reduction goal by promoting reductions in multiple sectors.

Page 4.18.0-19 (Table 4.18-4)

Table 4.18-4 GHG Reduction Measures and Estimated 2020 Reduced Emissions in Twentynine Palms

<i>Reduction Measure Number</i>	<i>Description</i>	<i>Emissions Reduced</i>
LOCAL MEASURES		
Building Energy		
Energy-1	Energy Efficiency of Existing Buildings	258
Energy-2	Outdoor Lighting	414
Energy-3	Green Building Ordinance	214
Energy-4	Solar Installation for New Housing	135
Energy-5	Solar Installation for New Commercial	94
Energy-7	Solar Installation for Existing Housing	465
Energy-8	Solar Installation for Existing Commercial/Industrial	38
Energy-9	Co-Generation Facilities	6
<i>LandUse-1 (BE)</i>	<i>Tree Planting Programs</i>	142
<i>LandUse-2 (BE)</i>	<i>Promote Rooftop Gardens</i>	1
<i>Water-1 (BE)</i>	<i>Require Tier 1 Voluntary CALGreen Standards for New Construction</i>	<u>272</u> 270
<i>Water-2 (BE)</i>	<i>Renovate Existing Buildings to Achieve Higher Levels of Water Efficiency</i>	<u>827</u> 800
GHG Performance Standard for New Development		
PS-1	GHG Performance Standard for New Development (29% below Projected BAU emissions for projects)	<u>2,165</u> 4,957
Total Reductions		<u>38,361</u> 38,335

4.2.21 Draft EIR Chapter 4 Section 4.19.0 (Introduction to the Analysis) [City of Victorville]

Page 4.19.0-8 (Figure 4.19-2)

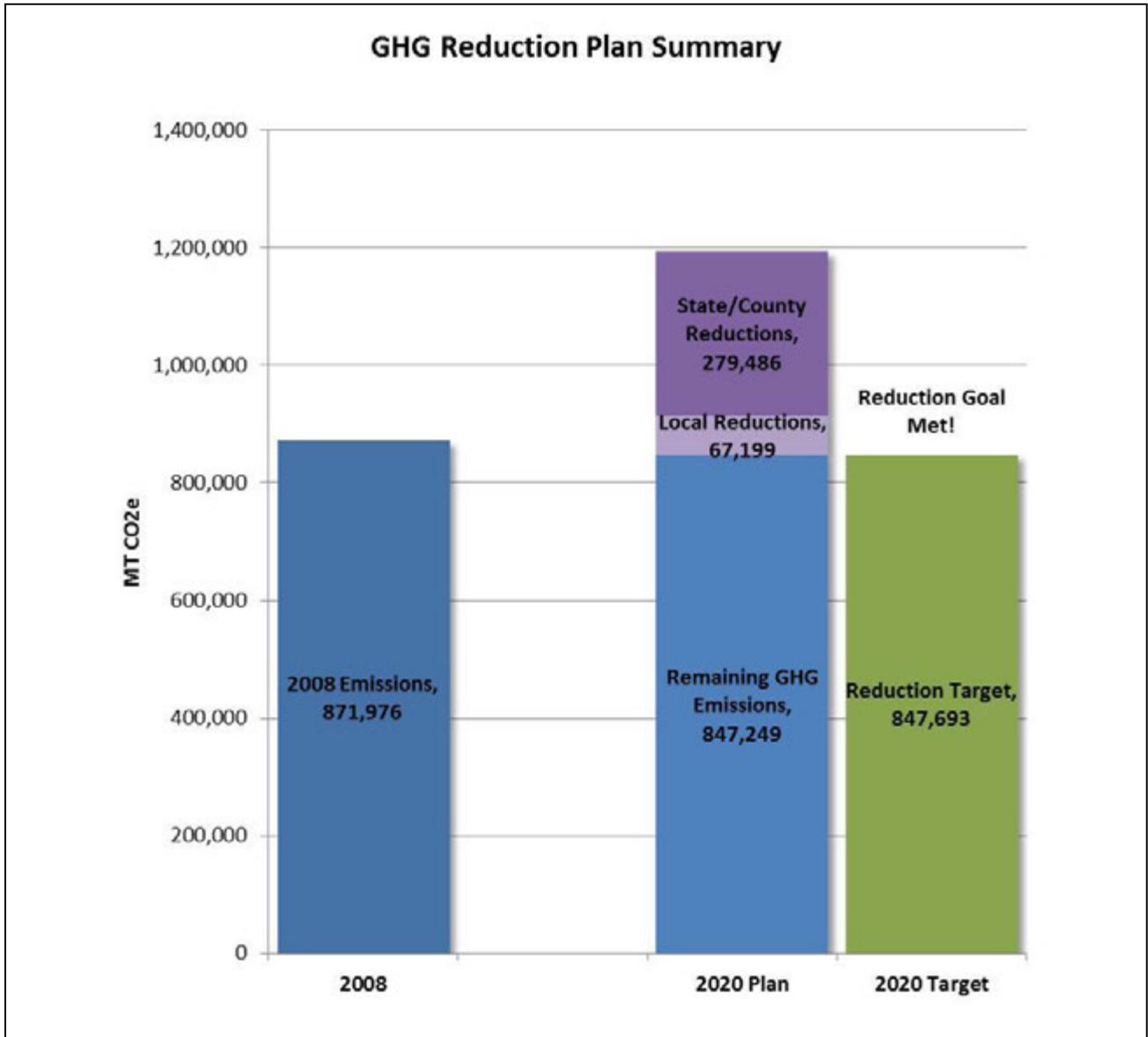


Figure 4.19-2 Emissions Reduction Profile for Victorville

Page 4.19.0-9 (Table 4.19-3)

Table 4.19-3 Emission Reduction by Sector for Victorville					
Sector	2008	2020 BAU	Reductions	2020 Emissions with Plan	% Reduction
Building Energy	442,667	607,252	<u>178,180</u> 184,659	<u>429,072</u> 422,592	<u>29.3%</u> 30.4%
On-Road Transportation	363,283	483,825	136,149	357,676	27.6%
Off-Road Equipment	38,613	50,458	8,738	41,720	17.3%
Solid Waste Management	7,433	10,551	814	9,737	7.7%
Agriculture	9,095	4,635	0	4,635	0.0%
Wastewater Treatment	4,524	5,915	182	5,733	3.1%
Water Conveyance	6,361	21,298	2,371	18,927	11.1%
GHG Performance Standard*	—	—	<u>20,251</u> 14,015	—	—
Total Emissions	871,976	1,193,933	<u>346,685</u> 346,928	<u>847,249</u> 847,005	<u>29.0%</u> 29.1%
Reduction Goal	—	—	346,241	847,693	29.0%
Met Goal?	—	—	Yes	Yes	Yes
Reductions Beyond Goal	—	—	<u>444</u> 688	—	—
Per-Capita Emissions	7.8	8.2	—	5.8	—
Per-Job Emissions	25.9	26.0	—	18.4	—
Excluded Stationary Source Emissions	2,235,411	2,528,364	—	—	—

SOURCE: San Bernardino Associated Governments, *San Bernardino County Regional Greenhouse Gas Reduction Plan*, Draft, Prepared by ICF International (December 2012).

Values may not sum due to rounding.

* The GHG Performance Standard for New Development is not a sector of the inventory, but it provides broad reductions and contributes toward the City's reduction goal by promoting reductions in multiple sectors.

Page 4.19.0-11 (Table 4.19-4)

Table 4.19-4 GHG Reduction Measures and Estimated 2020 Reduced Emissions in Victorville		
<i>Reduction Measure Number</i>	<i>Description</i>	<i>Emissions Reduced</i>
LOCAL MEASURES		
Building Energy		
Energy-1	Energy Efficiency of Existing Buildings	6,356
Energy-2	Outdoor Lighting	3,032
Energy-3	Green Building Ordinance	6,554
Energy-4	Solar Installation for New Housing	97
Energy-5	Solar Installation for New Commercial	6,031
Energy-6	Solar Installation for Warehouse Space	2,976
Energy-7	Solar Installation for Existing Housing	6,198
Energy-8	Solar Installation for Existing Commercial/Industrial	2,810
Energy-9	Co-Generation Facilities	360
<i>LandUse-1 (BE)</i>	<i>Tree Planting Programs</i>	182
<i>LandUse-2 (BE)</i>	<i>Promote Rooftop Gardens</i>	47
<i>Wastewater-2 (BE)</i>	<i>Equipment Upgrades</i>	765
<i>Water-1 (BE)</i>	<i>Require Tier 1 Voluntary CAL Green Standards for New Construction</i>	<u>2,162</u> 2,146
<i>Water-2 (BE)</i>	<i>Renovate Existing Buildings to Achieve Higher Levels of Water Efficiency</i>	<u>3,892</u> 3,766
<i>Water-4 (BE)</i>	<i>Implement SBX 7-7</i>	<u>267</u> 637
GHG Performance Standard for New Development		
PS-1	GHG Performance Standard for New Development (29% below Projected BAU emissions for projects)	<u>20,251</u> 44,045
Total Reductions		<u>346,685</u> 346,928

4.2.22 Draft EIR Chapter 4 Section 4.20.0 (Introduction to the Analysis) [City of Yucaipa]

Page 4.20.0-16 (Figure 4.20-2)

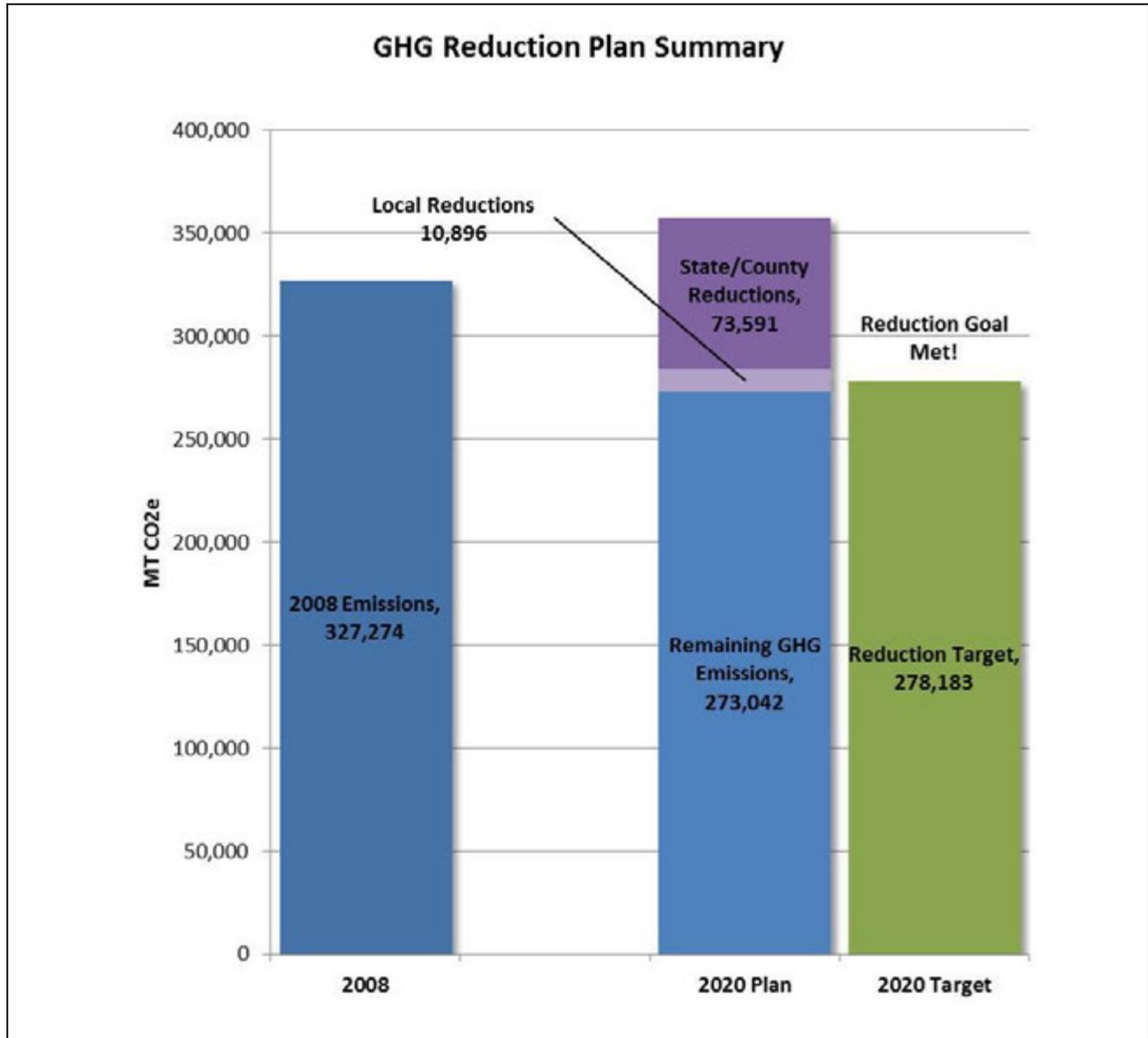


Figure 4.20-2 Emissions Reduction Profile for Yucaipa

Page 4.20.0-17 (Table 4.20-3)

Table 4.20-3 Emission Reduction by Sector for Yucaipa					
Sector	2008	2020 BAU	Reductions	2020 Emissions with Plan	% Reduction
Building Energy	122,591	139,098	<u>29,231</u> 35,462	<u>109,866</u> 406,635	<u>21.0%</u> 25.5%
On-Road Transportation	168,613	176,393	<u>48,711</u> 49,529	<u>127,682</u> 426,864	<u>27.6%</u> 28.1%
Off-Road Equipment	12,035	13,167	1,176	11,991	8.9%
Solid Waste Management	11,875	13,430	233	13,197	1.7%
Agriculture	3,967	2,022	0	2,022	0.0%
Wastewater Treatment	2,071	2,272	121	2,150	5.3%
Water Conveyance	6,122	11,147	2,303	8,844	20.7%
GHG Performance Standard*	—	—	2,710	—	—
Total Emissions	372,274	357,528	<u>84,487</u> 94,535	<u>273,042</u> 265,993	<u>23.6%</u> 25.6%
Reduction Goal	—	—	79,346	278,183	22.2%
Met Goal?	—	—	Yes	Yes	Yes
Reductions Beyond Goal	—	—	<u>5,141</u> 42,190	—	—
Per-Capita Emissions	6.4	6.4	—	<u>4.9</u> 4.8	—
Per-Job Emissions	33.5	32.7	—	<u>25.0</u> 24.4	—
Excluded Stationary Source Emissions	23,188	26,466	—	—	—

SOURCE: San Bernardino Associated Governments, *San Bernardino County Regional Greenhouse Gas Reduction Plan*, Draft, Prepared by ICF International (December 2012). Values may not sum due to rounding.

* The GHG Performance Standard for New Development is not a sector of the inventory, but it provides broad reductions and contributes toward the City's reduction goal by promoting reductions in multiple sectors.

Page 4.20.0-19 (Table 4.20-4)

Table 4.20-4 GHG Reduction Measures and Estimated 2020 Reduced Emissions in Yucaipa		
Reduction Measure Number	Description	Emissions Reduced
LOCAL MEASURES		
Building Energy		
Energy-7	Solar Installation for Existing Housing	1,087
Energy-8	Solar Installation for Existing Commercial/Industrial	96
Water-4 (BE)	Implement SBX 7-7	<u>4,143</u> 40,373
Total Reductions		<u>84,487</u> 94,535

4.2.23 Draft EIR Chapter 4 Section 4.21.0 (Introduction to the Analysis) [Town of Yucca Valley]

Page 4.21.0-8 (Figure 4.21-2)

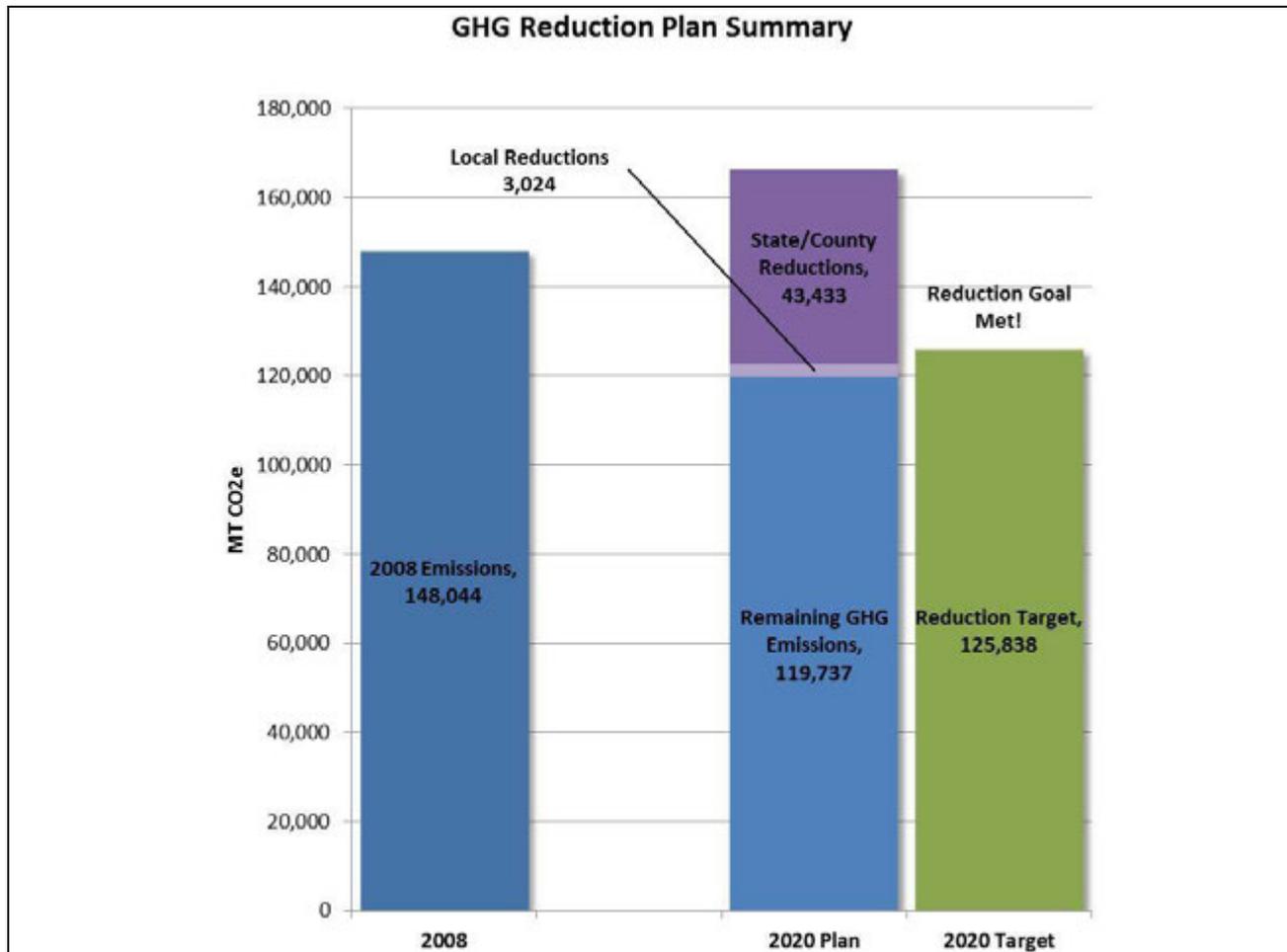


Figure 4.21-2 Emissions Reduction Profile for Yucca Valley

Page 4.21.0-9 (Table 4.21-3)

Table 4.21-3 Emission Reduction by Sector for Yucca Valley					
Sector	2008	2020 BAU	Reductions	2020 Emissions with Plan	% Reduction
Building Energy	53,347	62,236	<u>14,091</u> 44,454	<u>48,145</u> 47,785	<u>22.6%</u> 23.2%
On-Road Transportation	71,120	80,427	21,272	59,155	26.4%
Off-Road Equipment	6,680	7,419	663	6,757	8.9%
Solid Waste Management	10,992	12,359	8,172	4,187	66.1%
Agriculture	0	0	0	0	0.0%
Wastewater Treatment	4,138	1,522	18	1,504	1.2%
Water Conveyance	1,677	2,231	30	2,201	1.3%
GHG Performance Standard*	—	—	<u>0</u> 4,852	—	—
Total Emissions	148,044	166,194	<u>44,245</u> 46,457	<u>121,950</u> 119,737	<u>26.6%</u> 28.0%
Reduction Goal	—	—	40,357	125,838	24.3%
Met Goal?	—	—	Yes	Yes	Yes
Reductions Beyond Goal	—	—	<u>3,888</u> 6,100	—	—
Per-Capita Emissions	7.2	7.2	—	<u>5.3</u> 5.2	—
Per-Job Emissions	32.4	32.8	—	<u>24.0</u> 23.6	—
Excluded Stationary Source Emissions	16,719	29,491	—	—	—

SOURCE: San Bernardino Associated Governments, *San Bernardino County Regional Greenhouse Gas Reduction Plan*, Draft, Prepared by ICF International (December 2012).

Values may not sum due to rounding.

* The GHG Performance Standard for New Development is not a sector of the inventory, but it provides broad reductions and contributes toward the Town's reduction goal by promoting reductions in multiple sectors.

Page 4.21.0-12 (Table 4.21-4)

Table 4.21-4 GHG Reduction Measures and Estimated 2020 Reduced Emissions in Yucca Valley		
<i>Reduction Measure Number</i>	<i>Description</i>	<i>Emissions Reduced</i>
LOCAL MEASURES		
Building Energy		
Energy-1	Energy Efficiency of Existing Buildings	197
Energy-5	Solar Installation for New Commercial	21
Energy-7	Solar Installation for Existing Housing	336
Water-4 (BE)	Implement SBX 7-7	<u>210,570</u>
GHG Performance Standard for New Development		
PS-1	GHG Performance Standard for New Development (29% below Projected BAU emissions for projects)	1,862
Total Reductions		<u>44,245,46,457</u>

4.2.24 Draft EIR Chapter 4 Section 4.17.1 (Aesthetics) [City of San Bernardino]

Page 4.17.1-8

Impact 4.1-1 Implementation of the proposed project could adversely affect a scenic vista. Implementation of mitigation measures MM4.17.1-1a through MM4.17.1-1c would reduce this impact to *less than significant*.

MM4.17.1-1a ~~Renewable Solar~~ energy generating facilities shall be placed or constructed below any major ridgeline when viewed from any designated scenic corridor as identified in the San Bernardino General Plan.

MM4.17.1-1b ~~Renewable Solar~~ energy generating facilities shall not be:

- Located within middle and background scenic view sheds as identified in the General Plan
- Located in an area that would substantially obstruct views of adjacent property owners
- Allowed in areas where prohibited by the Alquist-Priolo Earthquake Fault Zoning Act, the terms of any easement, or the listing of the proposed site in the National Register of Historic Places or the California Register of Historical Resources, or on the City’s Historic Inventory

MM4.17.1-1c ~~Renewable Solar~~ energy generating facilities shall be limited to a height of 80 feet on parcels between one and 5 acres, and limited to a height of 100 feet on parcels greater than 5 acres.

Because the City of San Bernardino does not currently have development standards for wind turbines, wind turbines cannot be approved. Any future Development Code amendments allowing wind turbines will require CEQA review to determine the potential impacts to the environment.

4.2.25 Draft EIR Chapter 4 Section 4.17.1 (Aesthetics)

Page 4.17.1-9

Impact 4.1-2 **The proposed project could degrade the visual character or quality of the City. Implementation of mitigation measures MM4.17.1-2a through MM4.17.1-2f would reduce this impact to *less than significant*.**

MM4.17.1-2a *The minimum setback from any non-residential property line shall be equal to the ~~renewable-solar~~ energy system height.*

MM4.17.1-2b *The minimum setback of a commercial-scale ~~renewable-solar~~ energy system from any residential property line shall be at least 1,500 feet.*

MM4.17.1-2c *On open space, only one ~~renewable-solar~~ energy system unit per 10 acres shall be allowed. Units shall be installed with at least 240 feet separation from each other. If the units are to 50 feet in height, a maximum of two units may be installed for every 5 acres. For every additional 5 acres, one additional unit may be added not to exceed a maximum of five units and the separation between the units may be reduced to twice the height of the systems.*

MM4.17.1-2d *~~Renewable-Solar~~ energy generating facilities not incorporated into the building, or part of the parking structure, or considered an accessory structure to an existing residence shall be prohibited in urbanized residential neighborhoods.*

MM4.17.1-2e *Residential properties less than 5 acres shall be limited to one accessory ~~wind-solar~~ energy system that shall not exceed the height of the zone in which it is located.*

MM4.17.1-2f *Residential properties that are 5 acres and more shall be limited to two accessory ~~wind-solar~~ energy systems that shall not exceed the height of the zone in which it is located.*

Because the City of San Bernardino does not currently have development standards for wind turbines, wind turbines cannot be approved. Any future Development Code amendments allowing wind turbines will require CEQA review to determine the potential impacts to the environment.

4.2.26 Draft EIR Chapter 4 Section 4.17.1 (Aesthetics)

Page 4.17.1-10

Impact 4.1-3 **The proposed project could result in new sources of substantial light or glare that could adversely affect day or nighttime views in the area. Implementation of mitigation measures MM4.17.1-3a and MM4.17.1-3b would reduce this impact to *less than significant*.**

MM4.17.1-3a *All proposed solar energy-generating structures shall be constructed utilizing non-reflective materials to the maximum extent feasible. If a reflective material is used, appropriate shielding shall be placed or the structure relocated to reduce the amount of visible glare. The City shall review all discretionary projects prior to issuance of building permits to ensure that appropriate shielding and placement of such structures are included in design plans.*

MM4.17.1-3b *All proposed solar energy-generating structures in open spaces areas shall not be lighted unless required by code or regulation.*

Because the City of San Bernardino does not currently have development standards for wind turbines, wind turbines cannot be approved. Any future Development Code amendments allowing wind turbines will require CEQA review to determine the potential impacts to the environment.

4.2.27 Draft EIR Chapter 4 Section 4.X.3 (Air Quality)

Expansion of transit and including transit oriented development near the transit stations within San Bernardino County is an important goal for SANBAG. This goal reduces GHG emissions and vehicle miles traveled within the County as well as reduce air pollutants within the region. In reviewing the mitigation measures that reduce impacts associated with diesel particulate matter (DPM) near transit stations, SANBAG determined that the mitigation did not allow for transit oriented development near enough to the transit stations to provide environmental benefit. Therefore, the mitigation is amended to allow transit oriented development while safeguarding the health of the people living near transit and mitigating DPM concentrations to less than significant levels. The revisions to air quality mitigation affect six cities: Fontana, Montclair, Rancho Cucamonga, Redlands, Rialto, and San Bernardino. The revisions are as follows:

4.2.28 Draft EIR Chapter 4 Section 4.6.3 (Air Quality) [City of Fontana]

Page 4.6.3-16

Impact 4.3-1 **The proposed project would expose sensitive receptors to substantial pollutant concentrations. This would be a potentially significant impact. Implementation of mitigation measure MM4.6.3-1 would reduce this impact to *less than significant*.**

... the following mitigation measure is needed to reduce this potential impact to less than significant:

MM4.6.3-1 *Transit-oriented development near the Metrolink Stations shall set back all sensitive land uses (residential, daycare facilities, schools, preschools, and eldercare facilities) at least 500 feet from the nearest rail yard to reduce concentrations of air pollution, to acceptable levels. As an alternative to the setback, an air toxics health risk assessment of sensitive land uses should be completed demonstrating that sensitive land uses closer than 500 feet from the nearest rail yard will not result in a cancer risk of 10 in a million, and a non-cancer health risk of 1 on the health hazard index. The methodology of the health risk analysis must follow the protocols found on the Office of Environmental Hazards Assessment (OEHHA) website: <http://www.oehha.ca.gov/>.*

Implementation of mitigation measure MM4.6.3-1 would reduce this impact to ***less than significant***.

4.2.29 Draft EIR Chapter 4 Section 4.11.3 (Air Quality) [City of Montclair]

Page 4.11.3-16

Impact 4.3-1 The proposed project would expose sensitive receptors to substantial pollutant concentrations. This would be a potentially significant impact. Implementation of mitigation measure MM4.11.3-1 would reduce this impact to *less than significant*.

... the following mitigation measure is needed to reduce this potential impact to less than significant:

MM4.11.3-1 *Transit-oriented development near the Metrolink Stations shall set back all sensitive land uses (residential, daycare facilities, schools, preschools, and eldercare facilities) at least 500 feet from the nearest rail yard to reduce concentrations of air pollution, to acceptable levels. As an alternative to the setback, an air toxics health risk assessment of sensitive land uses should be completed demonstrating that sensitive land uses closer than 500 feet from the nearest rail yard will not result in a cancer risk of 10 in a million, and a non-cancer health risk of 1 on the health hazard index. The methodology of the health risk analysis must follow the protocols found on the Office of Environmental Hazards Assessment (OEHHA) website: <http://www.oehha.ca.gov/>.*

Implementation of mitigation measure MM4.11.3-1 would reduce this impact to *less than significant*.

4.2.30 Draft EIR Chapter 4 Section 4.14.3 (Air Quality) [City of Rancho Cucamonga]

Page 4.14.3-19

Impact 4.3-1 The proposed project would expose sensitive receptors to substantial pollutant concentrations. This would be a potentially significant impact. Implementation of mitigation measure MM4.14.3-1 would reduce this impact to *less than significant*.

... the following mitigation measure is needed to reduce this potential impact to less than significant:

MM4.14.3-1 *Transit-oriented development near the Metrolink Stations shall set back all sensitive land uses (residential, daycare facilities, schools, preschools, and eldercare facilities) at least 500 feet from the nearest rail yard to reduce concentrations of air pollution, to acceptable levels. As an alternative to the setback, an air toxics health risk assessment of sensitive land uses should be completed demonstrating that sensitive land uses closer than 500 feet from the nearest rail yard will not result in a cancer risk of 10 in a million, and a non-cancer health risk of 1 on the health hazard index. The methodology of the health risk analysis must follow the protocols found on the Office of Environmental Hazards Assessment (OEHHA) website: <http://www.oehha.ca.gov/>.*

Implementation of mitigation measure MM4.14.3-1 would reduce this impact to *less than significant*.

4.2.31 Draft EIR Chapter 4 Section 4.15.3 (Air Quality) [City of Redlands]

Page 4.14.3-17

Currently, the City of Redlands does not include Metrolink stations. However, the future Metrolink Redlands extension will extend Metrolink between San Bernardino and the City of Redlands. This future Metrolink line was not analyzed in the air quality section of the Draft EIR. Therefore, the following analysis is included to fully evaluate all environmental impacts (underline text is added to the EIR):

Project Impacts and Mitigation Measures

Threshold	Would the project expose sensitive receptors to substantial pollutant concentrations?
-----------	---

Impact 4.15.3-1 **The proposed project would expose sensitive receptors to substantial pollutant concentrations. This would be a potentially significant impact. Implementation of mitigation measure MM4.15.3-1 would reduce this impact to less than significant.**

As shown in Table 4.15.3-5, the Regional Reduction Plan will reduce criteria pollutant emissions within the City of Redlands. However, there is the potential to increase concentrations of air pollution within areas near transit stations as a result of the reduction measure On-Road Transportation-1 (Sustainable Communities Strategy [SCS]) in the Regional Reduction Plan. This is particularly true with future transit-oriented development because emission sources such as diesel-engines pulling the future Metrolink commuter train between San Bernardino and Redlands can be in close proximity to sensitive receptors such as residential land uses. Transit oriented development within the SCS encourages the increase in transit trains, which increases the concentrations of air pollutants including diesel particulate matter (DPM) within the neighborhoods of transit-oriented development.

The California ARB’s Land Use and Air Quality: A Community Health Perspective (California ARB 2005) recommends setbacks of sensitive land uses such as residential from sources of DPM to reduce concentrations of air pollution within sensitive land uses down to background levels. The document recommends a setback of 500 feet from high traffic roadways and a setback of 1,000 feet from major service and maintenance rail yards. DPM emissions near transit stations are not as high as either of these uses. In particular, rail yards have much higher DPM concentrations than transit stations because of the idling “switch engines” working within the major service and maintenance rail yards. Therefore, a setback for residential and other sensitive land uses (day care, preschools, and elder care facilities) of at least 500 feet but no more than 1,000 feet from the rail line would sufficiently reduce concentrations of air pollutants down to background levels. In addition, to still be transit-oriented development, residential units within the transit-oriented development must be within 0.25 mile (1,320 feet) from the transit station.

To evaluate the California ARB recommended setbacks within the context of transit stations, dispersion modeling was conducted using the USEPA Screen3 dispersion model to predict the DPM emissions concentrations and associated health risks at 500 feet, 1,000 feet, and 1,320 feet from the locomotive

engine pulling the Metrolink commuter train on the future Redlands Metrolink line. It is anticipated that the future Metrolink commuter train will include as many as 20 trains per day stopping at the future Redlands Metrolink Station with an average wait time of 3 minutes per stop. Table 4.15.3-6 (DPM Concentrations and Health Impacts) shows the results of the predicted concentration of DPM and associated health risks.

Table 4.15.3-6 DPM Concentrations and Health Impacts				
Distance from Tracks	DPM Concentration ($\mu\text{g}/\text{m}^3$)	Cancer Risk	Hazard Quotient	Significant?
500 feet	0.00462	1.47	0.00092	No
1,000 feet	0.00237	0.75	0.00047	No
1,320 feet	0.00219	0.70	0.00044	No
SCAQMD Thresholds		10	1	
SOURCE: SCAQMD (2012).				

Dispersion modeling predicts that sensitive land uses can be safely placed within transit-oriented development near the future Metrolink Station if those sensitive land uses are at least 500 feet from the rail lines. Therefore, the 500-foot setback will reduce impacts associated with exposure to substantial concentrations of air pollutants. Note that this mitigation does not affect transit-oriented development built around the Omnitrans Smart Bus system or future light-rail systems because they are natural gas or electric engines. These types of transit do not cause high concentrations of air pollutants near the transit stations. Therefore, the following mitigation measure is needed to reduce this potential impact to less than significant:

MM4.15.3-1 *Transit-oriented development near the Metrolink Stations shall set back all sensitive land uses (residential, daycare facilities, schools, preschools, and eldercare facilities) at least 500 feet from the nearest rail yard to reduce concentrations of air pollution, to acceptable levels. As an alternative to the setback, an air toxics health risk assessment of sensitive land uses should be completed demonstrating that sensitive land uses closer than 500 feet from the nearest rail yard will not result in a cancer risk of 10 in a million, and a non-cancer health risk of 1 on the health hazard index. The methodology of the health risk analysis must follow the protocols found on the Office of Environmental Hazards Assessment (OEHHA) website: <http://www.oehha.ca.gov/>.*

Implementation of mitigation measure MM4.15.3-1 would reduce this impact to ***less than significant***.

The addition of this analysis provides additional detail to the air quality evaluation in the EIR and does not disclose any new significant impacts. Rather, this analysis provides additional details supporting the less than significant conclusion finding in the Draft EIR.

4.2.32 Draft EIR Chapter 4 Section 4.16.3 (Air Quality) [City of Rialto]

Page 4.16.3-20

Impact 4.3-1 The proposed project would expose sensitive receptors to substantial pollutant concentrations. This would be a potentially significant impact. Implementation of mitigation measure MM4.16.3-1 would reduce this impact to *less than significant*.

... the following mitigation measure is needed to reduce this potential impact to less than significant:

MM4.16.3-1 *Transit-oriented development near the Metrolink Stations shall set back all sensitive land uses (residential, daycare facilities, schools, preschools, and eldercare facilities) at least 500 feet from the nearest rail yard to reduce concentrations of air pollution, to acceptable levels. As an alternative to the setback, an air toxics health risk assessment of sensitive land uses should be completed demonstrating that sensitive land uses closer than 500 feet from the nearest rail yard will not result in a cancer risk of 10 in a million, and a non-cancer health risk of 1 on the health hazard index. The methodology of the health risk analysis must follow the protocols found on the Office of Environmental Hazards Assessment (OEHHA) website: <http://www.oehha.ca.gov/>.*

Implementation of mitigation measure MM4.16.3-1 would reduce this impact to *less than significant*.

4.2.33 Draft EIR Chapter 4 Section 4.17.3 (Air Quality) [City of San Bernardino]

Page 4.17.3-17

Impact 4.3-1 The proposed project would expose sensitive receptors to substantial pollutant concentrations. This would be a potentially significant impact. Implementation of mitigation measure ~~MM4.17.3-1a and MM4.17.3-1b~~ would reduce this impact to *less than significant*.

... the following mitigation measure is needed to reduce this potential impact to less than significant:

MM4.17.3-1a *Transit-oriented development near the Metrolink Stations shall set back all sensitive land uses (residential, daycare facilities, schools, preschools, and eldercare facilities) at least 500 feet from the nearest rail yard to reduce concentrations of air pollution, to acceptable levels. As an alternative to the setback, an air toxics health risk assessment of sensitive land uses should be completed demonstrating that sensitive land uses closer than 500 feet from the nearest rail yard will not result in a cancer risk of 10 in a million, and a non-cancer health risk of 1 on the health hazard index. The methodology of the health risk analysis must follow the protocols found on the Office of Environmental Hazards Assessment (OEHHA) website: <http://www.oehha.ca.gov/>.*

~~**MM4.17.3-1b** *Transit oriented development would not be allowed in conjunction with the San Bernardino Santa Fe Depot.*~~

Implementation of mitigation measure MM4.17.3-1 would reduce this impact to *less than significant*.

4.2.34 Draft EIR Chapter 4 Section 4.X.7 (Greenhouse Gas Emissions)

As described above, a minor error in the calculations of GHG emissions reductions associated with the water conservation was found. While correcting the error changed the numerical values of 2020 GHG emissions for each city in the Regional Reduction Plan and associated Draft EIR, each of the Participating Cities still met their GHG reduction targets and the Findings in the Draft EIR associated with environmental impacts from GHG emissions remain the same. To provide accuracy in the FEIR, Tables 4.1.7-2 through 4.21.7-2 in the Draft EIR are modified to show this correction.

4.2.35 Draft EIR Chapter 4 Section 4.1.7 (Greenhouse Gas Emissions) [City of Adelanto]

Page 4.1.7-17 (Table 4.1.7-2)

Table 4.1.7-2 GHG Emission Inventories and Reductions in the City of Adelanto					
<i>Category</i>	<i>Metric tons of CO₂e</i>				
	<i>2008</i>	<i>2020 BAU</i>	<i>Plan Reductions</i>	<i>2020 with Plan</i>	<i>% Reduction</i>
Energy Emission Source	63,173	92,446	<u>38,830</u> 42,004	<u>58,616</u> 50,445	<u>36.6%</u> 45.40%
On-Road Transportation Energy	97,508	161,472	43,896	117,576	27.20%
Off-road Equipment On-Road Transportation	12,144	17,655	3,157	14,498	17.90%
Wastewater Treatment Off-road Equipment	1,744	2,381	270	2,110	11.30%
Water Conveyance Wastewater Treatment	9,664	4,925	0	4,925	0.00%
Solid Waste Water Conveyance	1,262	1,876	176	1,699	9.40%
Agriculture Solid Waste	3,045	5,222	1,122	4,100	21.50%
GHG Performance Standard for New Development ^a Agriculture	—	—	<u>8,797</u> 7,139	—	—
Total GHG Performance Standard for New Development^a	188,539	285,976	<u>91,246</u> 97,760	<u>194,730</u> 188,216	<u>31.9%</u> 43.20%
Reduction Target	—	—	<u>85,793</u> 58,793	200,183	30.00%
Reduction Target	—	—	<u>58,793</u>	200,183	30.00%
Does the Plan Meet the Reduction Target?	No	No	Yes	Yes	Yes
Reductions Beyond Target	—	—	<u>5,453</u> 11,967	—	—
Excluded Stationary Sources under Title V Permits ^b	16,597	22,015	—	—	—

Values may not sum due to rounding.

- a. The GHG Performance Standard for New Development is not a sector of the inventory, but it contributes toward the reduction target by promoting reductions in multiple sectors. See the Regional Reduction Plan Chapter 4 for a complete description of this measure.
- b. Excluded from target setting and reductions due to lack of jurisdictional control (see Analytical Method section above).

4.2.36 Draft EIR Chapter 4 Section 4.3.7 (Greenhouse Gas Emissions) [City of Chino]

Page 4.3.7-18 (Table 4.3.7-2)

Table 4.3.7-2 GHG Emission Inventories and Reductions in the City of Chino					
<i>Category</i>	<i>Metric tons of CO₂e</i>				
Emission Source	2008	2020 BAU	Plan Reductions	2020 with Plan	% Reduction
Energy	403,585	456,978	<u>103,579</u> 119,138	<u>353,399</u> 337,840	<u>22.7%</u> 26.1%
On-Road Transportation	407,132	443,060	<u>113,419</u> 117,200	<u>329,640</u> 325,860	<u>25.6%</u> 26.5%
Off-road Equipment	82,908	90,661	8,100	82,562	8.9%
Solid Waste	16,239	17,305	2,077	15,227	12.0%
Agriculture	101,287	51,623	0	51,623	0.0%
Wastewater Treatment	3,057	3,613	232	3,381	6.4%
Water Conveyance	17,684	21,736	2,432	19,305	11.2%
GHG Performance Standard for New Development	—	—	286	—	—
Total	1,031,892	1,084,975	<u>230,126</u> 249,465	<u>854,850</u> 835,511	<u>21.2%</u> 23.0%
Reduction Target	—	—	207,867	877,108	19.2%
Does the Plan Meet the Reduction Target?	—	—	Yes	Yes	Yes
Reductions Beyond Target	—	—	<u>22,258</u> 41,597	—	—
Excluded Stationary Sources under Title V Permits ^b	207,650	244,412	—	—	—

Values may not sum due to rounding.

- a. The GHG Performance Standard for New Development is not a sector of the inventory, but it contributes toward the reduction target by promoting reductions in multiple sectors. See the Regional Plan Chapter 4 for a complete description of this measure.
- b. Excluded from target setting and reductions due to lack of jurisdictional control (see Analytical Method section, above).

4.2.37 Draft EIR Chapter 4 Section 4.4.7 (Greenhouse Gas Emissions) [City of Chino Hills]

Page 4.4.7-17 (Table 4.4.7-2)

Table 4.4.7-2 GHG Emission Inventories and Reductions in the City of Chino Hills					
<i>Category/Emission Source</i>	<i>Metric tons of CO₂e</i>				
	<i>2008</i>	<i>2020 BAU</i>	<i>Plan Reductions</i>	<i>2020 with Plan</i>	<i>% Reduction</i>
Energy	162,380	173,369	<u>39,579</u> 49,040	<u>133,790</u> 124,328	<u>22.8%</u> 28.3%
On-Road Transportation	265,707	265,709	74,014	191,696	27.9%
Off-road Equipment	14,628	15,040	1,344	13,696	8.9%
Wastewater Treatment	3,016	3,116	265	2,851	8.5%
Water Conveyance	5,909	8,790	1,906	6,883	21.7%
Solid Waste	6,831	11,754	80	11,674	0.7%
Agriculture	5,691	2,900	0	2,900	0.0%
GHG Performance Standard for New Development*	—	—	0	—	—
Total	464,162	480,677	<u>117,187</u> 126,649	<u>363,490</u> 354,028	<u>24.4%</u> 26.3%
Reduction Target	—	—	96,135	384,542	20.0%
Does the Plan Meet the Reduction Target?			Yes	Yes	Yes
Reductions Beyond Target	—	—	<u>21,052</u> 30,514	—	—
Excluded Stationary Sources under Title V Permits ^b	25,417	33,375	—	—	—

Values may not sum due to rounding.

- The GHG Performance Standard for New Development is not a sector of the inventory, but it contributes toward the reduction target by promoting reductions in multiple sectors. See the Regional Reduction Plan Chapter 4 for a complete description of this measure.
- Excluded from target setting and reductions due to lack of jurisdictional control (see Analytical Method section, above).

4.2.38 Draft EIR Chapter 4 Section 4.5.7 (Greenhouse Gas Emissions) [City of Colton]

Page 4.5.7-16 (Table 4.5.7-2)

Table 4.5.7-2 GHG Emission Inventories and Reductions in the City of Colton					
Category/Emission Source	Metric Tons of CO ₂ e				
	2008	2020 BAU	Plan Reductions	2020 with Plan	% Reduction
Building Energy	410,302	437,695	<u>155,962</u> 165,269	<u>281,734</u> 272,426	<u>35.6%</u> 37.9%
On-Road Transportation	215,836	230,059	65,043	165,017	28.3 %
Off-Road Equipment	22,891	26,167	3,368	22,799	12.9%
Solid Waste Management	18,037	18,826	12,209	6,616	64.9%
Agriculture	731	373	0	373	0%
Wastewater Treatment	2,128	2,519	1,566	953	62.2%
Water Conveyance	12,492	16,739	2,955	13,783	17.7%
GHG Performance Standard for New Development	—	—	<u>3,618</u> 238	—	—
Total	682,418	732,377	<u>244,722</u> 250,649	<u>487,656</u> 481,728	<u>33.4%</u> 34.2%
Reduction Target	—	—	<u>162,940</u> 152,322	<u>569,437</u> 580,055	<u>22.2%</u> 20.8%
Does the Plan Meet the Reduction Target?	—	—	Yes	Yes	Yes
Reductions Beyond Target	—	—	<u>81,782</u> 98,684	—	—
Excluded Stationary Sources under Title V Permits ^b	55,509	60,605	—	—	—

Values may not sum due to rounding.

- a. The GHG Performance Standard for New Development is not a sector of the inventory, but it contributes toward the reduction target by promoting reductions in multiple sectors. See the Regional Reduction Plan Chapter 4 for a complete description of this measure.
- b. Excluded from target setting and reductions due to lack of jurisdictional control (see Analytical Method section, above).

4.2.39 Draft EIR Chapter 4 Section 4.6.7 (Greenhouse Gas Emissions) [City of Fontana]

Page 4.6.7-18 (Table 4.6.7-2)

Table 4.6.7-2 GHG Emission Inventories and Reductions in the City of Fontana					
<i>Category</i>	<i>Metric tons of CO₂e</i>				
Emission Source	2008	2020 BAU	Plan Reductions	2020 with Plan	% Reduction
Energy	483,683	556,973	152,699 210,326	404,274 346,647	27.4% 37.8%
On-Road Transportation	635,066	690,099	190,870	499,229	27.7%
Off-road Equipment	73,650	83,979	7,503	76,477	8.9%
Wastewater Treatment	7,842	9,064	992	8,072	10.9%
Water Conveyance	15,265	20,138	6,043	14,095	30.0%
Solid Waste	19,570	24,052	16,315	7,737	67.8%
Agriculture	3,850	1,962	0	1,962	0.0%
GHG Performance Standard for New Development	—	—	13,575 29,882	—	—
Total	1,238,926	1,386,267	387,998 445,624	998,269 940,643	28.0% 32.1%
Reduction Target	—	—	333,180	1,053,087	24.0%
Does the Plan Meet the Reduction Target?	—	—	Yes	Yes	Yes
Reductions Beyond Target	—	—	54,818 412,444	—	—
Excluded Stationary Sources under Title V Permits ^b	131,922	151,072	—	—	—

SOURCE: San Bernardino Associated Governments, *San Bernardino County Regional Greenhouse Gas Reduction Plan*, Draft, Prepared by ICF International (December 2012).

Values may not sum due to rounding.

- a. The GHG Performance Standard for New Development is not a sector of the inventory, but it contributes toward the reduction target by promoting reductions in multiple sectors. See the Regional Reduction Plan Chapter 4 for a complete description of this measure.
- b. Excluded from target setting and reductions due to lack of jurisdictional control (see Analytical Method section, above).

4.2.40 Draft EIR Chapter 4 Section 4.7.7 (Greenhouse Gas Emissions) [City of Grand Terrace]

Page 4.7.7-20 (Table 4.7.7-2)

Table 4.7.7-2 GHG Emission Inventories and Reductions in the City of Grand Terrace					
<i>Category</i>	<i>Metric tons of CO₂e</i>				
Emission Source	2008	2020 BAU	Plan Reductions	2020 with Plan	% Reduction
Energy	33,593	35,395	<u>9,503</u> 14,780	<u>25,891</u> 20,615	<u>26.9%</u> 41.8%
On-Road Transportation	41,756	41,436	11,791	29,645	28.5%
Off-road Equipment	3,909	3,922	350	3,572	8.9%
Wastewater Treatment	3,863	3,895	2,685	1,210	68.9%
Water Conveyance	116	59	0	59	0.0%
Solid Waste	476	474	45	429	9.5%
Agriculture	2,362	3,029	388	2,641	12.8%
GHG Performance Standard for New Development	—	—	6	—	—
Total	86,075	88,210	<u>24,769</u> 30,045	<u>64,441</u> 58,165	<u>28.1%</u> 34.1%
Reduction Target	—	—	15,046	73,164	17.1%
Does the Plan Meet the Reduction Target?	—	—	Yes	Yes	Yes
Reductions Beyond Target	—	—	<u>9,723</u> 14,999	—	—
Excluded Stationary Sources under Title V Permits ^b	7.3	7.6	—	5	—

Values may not sum due to rounding.

- a. The GHG Performance Standard for New Development is not a sector of the inventory, but it contributes toward the reduction target by promoting reductions in multiple sectors. See the Regional Reduction Plan Chapter 4 for a complete description of this measure.
- b. Excluded from target setting and reductions due to lack of jurisdictional control (see Analytical Method section, above).

4.2.41 Draft EIR Chapter 4 Section 4.8.7 (Greenhouse Gas Emissions) [City of Hesperia]

Page 4.8.7-19 (Table 4.8.7-2)

Table 4.8.7-2 GHG Emission Inventories and Reductions in the City of Hesperia					
<i>Category</i>	<i>Metric tons of CO₂e</i>				
Emission Source	2008	2020 BAU	Plan Reductions	2020 with Plan	% Reduction
Energy	175,682	202,584	63,042 62,945	139,542 139,639	31.1%
On-Road Transportation	255,860	314,249	87,282	226,967	27.8%
Off-road Equipment	27,949	31,045	3,983	27,062	12.8%
Solid Waste	7,007	8,858	745	8,113	8.4%
Agriculture	5,572	2,840	0	2,840	0.0%
Wastewater Treatment	3,624	3,995	53	3,942	1.3%
Water Conveyance	11,677	28,968	3,426	25,542	11.8%
GHG Performance Standard for New Development ^a	—	—	13,418 13,420	—	—
Total	487,372	592,539	171,949 171,854	420,590 420,685	29.0%
Reduction Target	—	—	171,836	420,702	29.0%
Does the Plan Meet the Reduction Target?	—	—	Yes	Yes	Yes
Reductions Beyond Target	—	—	112 17	—	—
Excluded Stationary Sources under Title V Permits ^b	50,216	71,693	—	—	—

Values may not sum due to rounding.

a. The GHG Performance Standard for New Development is not a sector of the inventory, but it contributes toward the reduction target by promoting reductions in multiple sectors. See the Regional Reduction Plan Chapter 4 for a complete description of this measure.

b. Excluded from target setting and reductions due to lack of jurisdictional control (see Analytical Method section above).

4.2.42 Draft EIR Chapter 4 Section 4.9.7 (Greenhouse Gas Emissions) [City of Highland]

Page 4.9.7-19 (Table 4.9.7-2)

Table 4.9.7-2 GHG Emission Inventories and Reductions in the City of Highland					
<i>Category</i>	<i>Metric tons of CO₂e</i>				
Emission Source	2008	2020 BAU	Plan Reductions	2020 with Plan	% Reduction
Energy	100,948	120,044	35,119 56,192	84,925 63,852	29.3% 46.8%
On-Road Transportation	133,010	145,050	40,424	104,626	27.9%
Off-road Equipment	11,736	13,319	1,280	12,040	9.6%
Solid Waste	9,533	10,957	3,715	7,242	33.9%
Agriculture	715	364	0	364	0.0%
Wastewater Treatment	2,143	2,387	271	2,116	11.3%
Water Conveyance	8,974	11,417	2,387	9,030	20.9%
GHG Performance Standard for New Development	-	-	3,114	-	-
Total	267,058	303,538	86,308 407,384	217,230 196,157	28.4% 35.4%
Reduction Target			66,778	236,760	22.0%
Does the Plan Meet the Reduction Target?			Yes	Yes	Yes
Reductions Beyond Target			19,530 40,603		
Excluded Stationary Sources under Title V Permits ^b	15,615	20,364			

Values may not sum due to rounding.

- a. The GHG Performance Standard for New Development is not a sector of the inventory, but it contributes toward the reduction target by promoting reductions in multiple sectors. See the Regional Reduction Plan Chapter 4 for a complete description of this measure.
- b. Excluded from target setting and reductions due to lack of jurisdictional control (see Analytical Method section, above).

4.2.43 Draft EIR Chapter 4 Section 4.10.7 (Greenhouse Gas Emissions) [City of Loma Linda]

Page 4.10.7-18 (Table 4.10.7-2)

Table 4.10.7-2 GHG Emission Inventories and Reductions in the City of Loma Linda					
<i>Category/Emission Source</i>	<i>Metric tons of CO₂e</i>				
	<i>2008</i>	<i>2020 BAU</i>	<i>Plan Reductions</i>	<i>2020 with Plan</i>	<i>% Reduction</i>
Energy	123,772	157,122	<u>32,524</u> 34,002	<u>124,598</u> 123,120	<u>20.7%</u> 21.6%
On-Road Transportation	111,850	133,966	39,183	94,783	29.2%
Off-road Equipment	6,747	8,451	993	7,458	11.7%
Wastewater Treatment	931	1,088	16	1,072	1.5%
Water Conveyance	1,636	2,332	336	1,996	14.4%
Solid Waste	6,911	6,925	1,614	5,312	23.3%
Agriculture	675	344	0	344	0.0%
GHG Performance Standard for New Development	—	—	<u>6,094</u> 80,734	—	—
Total	252,521	310,229	<u>80,759</u> 80,734	<u>229,470</u> 229,495	26.0%
Reduction Target			80,660	229,570	26.0%
Does the Plan Meet the Reduction Target?			Yes	Yes	Yes
Reductions Beyond Target	—	—	<u>100</u> 75	—	—
Excluded Stationary Sources under Title V Permits ^b	33,316	45,375	—	—	—

Values may not sum due to rounding.

- a. The GHG Performance Standard for New Development is not a sector of the inventory, but it contributes toward the reduction target by promoting reductions in multiple sectors. See the Regional Reduction Plan Chapter 4 for a complete description of this measure.
- b. Excluded from target setting and reductions due to lack of jurisdictional control (see Analytical Method section, above).

4.2.44 Draft EIR Chapter 4 Section 4.11.7 (Greenhouse Gas Emissions) [City of Montclair]

Page 4.11.7-16 (Table 4.11.7-2)

Table 4.11.7-2 GHG Emission Inventories and Reductions in the City of Montclair					
Category/Emission Source	Metric tons of CO ₂ e				
	2008	2020 BAU	Plan Reductions	2020 with Plan	% Reduction
Building Energy	87,0888	93,284	<u>25,433</u> 35,664	<u>67,851</u> 57,664	<u>27.3%</u> 38.2%
On-Road Transportation	144,013	145,119	41,393	103,726	28.5%
Off-Road Equipment	16,474	17,917	1,782	16,135	9.9%
Solid Waste Management	10,108	9,873	5,096	4,777	51.6%
Agriculture	0	0	0	0	0%
Wastewater Treatment	1,455	1,614	121	1,494	7.5%
Water Conveyance	9,687	11,313	1,480	9,833	13.1%
GHG Performance Standard for New Development	—	—	<u>678</u> 325	—	—
Total	268,825	279,120	<u>75,982</u> 85,864	<u>203,138</u> 193,260	<u>27.2%</u> 30.8%
Reduction Target	—	—	64,061	215,060	23.0%
Does the Plan Meet the Reduction Target?	—	—	Yes	Yes	Yes
Reductions Beyond Target	—	—	<u>11,922</u> 21,800	—	—
Excluded Stationary Sources under Title V Permits ^b	42,224	45,753	—	—	—

Values may not sum due to rounding.

- a. The GHG Performance Standard for New Development is not a sector of the inventory, but it contributes toward the reduction target by promoting reductions in multiple sectors. See the Regional Reduction Plan Chapter 4 for a complete description of this measure.
- b. Excluded from target setting and reductions due to lack of jurisdictional control (see Analytical Method section, above).

4.2.45 Draft EIR Chapter 4 Section 4.12.7 (Greenhouse Gas Emissions) [City of Needles]

Page 4.12.7-16 (Table 4.12.7-2)

Table 4.12.7-2 GHG Emission Inventories and Reductions in the City of Needles					
Category/Emission Source	Metric tons of CO ₂ e				
	2008	2020 BAU	Plan Reductions	2020 with Plan	% Reduction
Building Energy	35,964	35,232	12,669 12,685	22,563 22,547	36.0%
On-Road Transportation	35,135	35,468	8,402	27,066	23.7%
Off-Road Equipment	2,549	2,587	300	2,287	11.6%
Solid Waste Management	3,915	3,989	49	3,940	1.2%
Agriculture	0	0	0	0	0.0%
Wastewater Treatment	196	201	101	101	50.0%
Water Conveyance	999	1,019	14	1,005	1.4%
GHG Performance Standard for New Development ¹	—	—	<u>227</u>	—	—
Total	78,759	78,496	21,556	56,939	27.5%
Reduction Target	—	—	11,550	66,946	14.7%
Does the Plan Meet the Reduction Target?	—	—	Yes	Yes	Yes
Reductions Beyond Target	—	—	10,006	—	—
Excluded Stationary Sources under Title V Permits ^b	7,391	7,807	—	—	—

Values may not sum due to rounding

- a. The GHG Performance Standard for New Development is not a sector of the inventory, but it contributes toward the reduction target by promoting reductions in multiple sectors. See Regional Reduction Plan Chapter 4 for a complete description of this measure.
- b. Excluded from target setting and reductions due to lack of jurisdictional control (see Analytical Method section above)

4.2.46 Draft EIR Chapter 4 Section 4.13.7 (Greenhouse Gas Emissions) [City of Ontario]

Page 4.13.7-19 (Table 4.13.7-2)

Table 4.13.7-2 GHG Emission Inventories and Reductions in the City of Ontario					
<i>Category</i>	<i>Metric tons of CO₂e</i>				
Emission Source	2008	2020 BAU	Plan Reductions	2020 with Plan	% Reduction
Energy	933,718	1,244,079	<u>417,329</u> 446,307	<u>826,749</u> 797,772	<u>33.5%</u> 35.9%
On-Road Transportation	942,020	1,169,171	308,445	860,726	26.4%
Off-road Equipment	176,314	229,069	36,130	192,939	15.8%
Wastewater Treatment	6,587	8,781	534	8,247	6.1%
Water Conveyance	29,044	38,575	7,252	31,323	18.8%
Solid Waste	60,000	64,326	26,265	38,061	40.8%
Agriculture	356,131	323,390	79,939	243,450	24.7%
GHG Performance Standard for New Development			29,882		
<u>Additional Reductions⁺</u>	=	=	<u>17,440</u>	=	=
Total	2,503,816	3,077,390	<u>923,217</u> 934,754	<u>2,154,173</u> 2,142,636	<u>30.0%</u> 30.4%
Reduction Target			923,217	2,154,173	30.0%
Does the Plan Meet the Reduction Target?			Yes	Yes	Yes
<i>Reductions Beyond Target</i>			<u>0</u> 41,537		
Excluded Stationary Sources under Title V Permits ^b	405,195	511,548			

Values may not sum due to rounding.

a. The GHG Performance Standard for New Development is not a sector of the inventory, but it contributes toward the reduction target by promoting reductions in multiple sectors. See the Regional Reduction Plan Chapter 4 for a complete description of this measure.

b. Excluded from target setting and reductions due to lack of jurisdictional control (see Analytical Method section, above).

+ Ontario has been customizing its Climate Action Plan to reflect specific City conditions and making some adjustments to individual measures. When applying these city-specific adjustments, the Ontario CAP would meet (and likely exceed) its goal. Thus, the total for Ontario was adjusted to reflect to the City meeting its goal. Ontario's Climate Action Plan will be released in 2014 and will describe the City-level analysis demonstrating that it will meet its goal.

4.2.47 Draft EIR Chapter 4 Section 4.14.7 (Greenhouse Gas Emissions) [City of Rancho Cucamonga]

Page 4.14.7-25 (Table 4.14.7-2)

Table 4.14.7-2 GHG Emission Inventories and Reductions in the City of Rancho Cucamonga					
<i>Category</i>	<i>Metric tons of CO₂e</i>				
Emission Source	2008	2020 BAU	Plan Reductions	2020 with Plan	% Reduction
Energy	693,422	722,126	<u>164,946</u> 190,187	<u>557,180</u> 531,939	<u>22.8%</u> 26.3%
On-Road Transportation	702,904	701,998	196,212	505,786	28.0%
Off-road Equipment	80,830	82,950	7,411	75,539	8.9%
Solid Waste	29,042	29,475	14,426	15,049	48.9%
Agriculture	300	153	0	153	0.0%
Wastewater Treatment	6,584	6,801	242	6,559	3.6%
Water Conveyance	46,054	50,598	7,529	43,069	14.9%
GHG Performance Standard for New Development ^a			0		
Total	1,559,136	1,594,101	<u>390,766</u> 446,007	<u>1,203,335</u> 1,178,094	<u>24.5%</u> 26.1%
Reduction Target	—	—	268,835	1,325,266	16.9%
Does the Plan Meet the Reduction Target?	—	—	Yes	Yes	Yes
Reductions Beyond Target	—	—	<u>121,931</u> 147,172	—	—
Excluded Stationary Sources under Title V Permits ^b	162,416	171,551	—	—	—

Values may not sum due to rounding.

a. The GHG Performance Standard for New Development is not a sector of the inventory, but if applicable, it contributes toward the reduction target by promoting reductions in multiple sectors. See the Regional Reduction Plan, Chapter 4 for a complete description of this measure.

b. Excluded from target setting and reductions due to lack of jurisdictional control (see Analytical Method section above)

4.2.48 Draft EIR Chapter 4 Section 4.15.7 (Greenhouse Gas Emissions) [City of Redlands]

Page 4.15.7-21 (Table 4.15.7-2)

Table 4.15.7-2 GHG Emission Inventories and Reductions in the City of Redlands					
Category/Emission Source	Metric tons of CO ₂ e				
	2008	2020 BAU	Plan Reductions	2020 with Plan	% Reduction
Building Energy	302,160	342,534	<u>87,001</u> 133,576	<u>255,533</u> 208,958	<u>25.4%</u> 39.0%
On-Road Transportation	319,157	349,518	98,342	251,176	28.1%
Off-Road Equipment	30,147	33,528	<u>2,995</u> 3,496	<u>30,532</u> 30,034	<u>8.9%</u> 10.4%
Solid Waste Management	16,391	17,877	<u>96</u> 6,680	<u>17,781</u> 11,197	<u>0.5%</u> 37.4%
Agriculture	3,298	1,681	0	1,681	0%
Wastewater Treatment	2,773	3,072	<u>345</u> 278	<u>2,727</u> 2,794	<u>11.2%</u> 9.0%
Water Conveyance	19,161	22,242	<u>5,097</u> 4,772	<u>17,146</u> 17,470	<u>22.9%</u> 21.5%
GHG Performance Standard for New Development	—	—	<u>0</u> 4,780	—	—
Total	693,087	770,452	<u>193,876</u> 251,024	<u>576,576</u> 518,528	<u>25.2%</u> 32.7%
Reduction Target	—	—	181,328	589,124	23.5%
Does the Plan Meet the Reduction Target?	—	—	Yes	Yes	Yes
Reductions Beyond Target	—	—	<u>12,548</u> 70,596	—	—
Excluded Stationary Sources under Title V Permits ^b	92,324	109,197	—	—	—

Values may not sum due to rounding.

- a. The GHG Performance Standard for New Development is not a sector of the inventory, but it contributes toward the reduction target by promoting reductions in multiple sectors. See the Regional Reduction Plan Chapter 4 for a complete description of this measure.
- b. Excluded from target setting and reductions due to lack of jurisdictional control (see Analytical Method section, above).

4.2.49 Draft EIR Chapter 4 Section 4.16.7 Greenhouse Gas Emissions) [City of Rialto]

Page 4.16.7-20 (Table 4.16.7-2)

Table 4.16.7-2 GHG Emission Inventories and Reductions in the City of Rialto					
<i>Category</i>	<i>Metric tons of CO₂e</i>				
Emission Source	2008	2020 BAU	Plan Reductions	2020 with Plan	% Reduction
Energy	233,905	271,828	<u>104,446</u> 151,903	<u>167,383</u> 119,924	<u>38.4%</u> 55.90%
On-Road Transportation	302,001	326,257	90,185	236,062	27.60%
Off-road Equipment	40,061	44,508	7,611	36,897	17.10%
Solid Waste	14,269	15,708	11,807	3,901	75.20%
Agriculture	245	125	0	125	0.00%
Wastewater Treatment	4,001	4,476	419	4,056	9.40%
Water Conveyance	14,297	39,327	8,687	30,640	22.10%
GHG Performance Standard for New Development ^a	—	—	<u>7,442</u> 6,557	—	—
Total	608,779	702,229	<u>230,607</u> 277,179	<u>471,622</u> 425,050	<u>32.8%</u> 39.50%
Reduction Target	—	—	184,776	517,462	26.30%
Does the Plan Meet the Reduction Target?	—	—	Yes	Yes	Yes
Reductions Beyond Target	—	—	<u>45,840</u> 92,413	—	—
Excluded Stationary Sources under Title V Permits ^b	67,952	80,427	—	—	—

Values may not sum due to rounding.

- The GHG Performance Standard for New Development is not a sector of the inventory, but it contributes toward the reduction target by promoting reductions in multiple sectors. See the Regional Reduction Plan Chapter 4 for a complete description of this measure.
- Excluded from target setting and reductions due to lack of jurisdictional control (see Analytical Method section, above).

4.2.50 Draft EIR Chapter 4 Section 4.17.7 (Greenhouse Gas Emissions) [City of San Bernardino]

Page 4.17.7-19 (Table 4.17.7-2)

Table 4.17.7-2 GHG Emission Inventories and Reductions in the City of San Bernardino					
<i>Category</i>	<i>Metric tons of CO₂e</i>				
Emission Source	2008	2020 BAU	Plan Reductions	2020 with Plan	% Reduction
Energy	578,446	649,824	166,904 170,938	482,920 478,886	25.7% 26.3%
On-Road Transportation	810,577	891,216	250,578	640,638	28.1%
Off-road Equipment	96,602	100,337	18,455	81,882	18.4%
Solid Waste	66,492	72,386	48,520	23,866	67.0%
Agriculture	1,909	973	0	973	0.0%
Wastewater Treatment	8,490	9,407	176	9,231	1.9%
Water Conveyance	25,365	45,858	2,939	42,919	6.4%
GHG Performance Standard for New Development ^a	-	-	20,049	-	-
Total	1,587,881	1,770,000	507,621 511,655	1,262,379 1,258,345	28.7% 28.9%
Reduction Target	-	-	420,302	1,349,698	23.7%
Does the Plan Meet the Reduction Target?	-	-	Yes	Yes	Yes
Reductions Beyond Target	-	-	87,319 94,353	-	-
Excluded Stationary Sources under Title V Permits ^b	322,801	301,927	-	-	-

Values may not sum due to rounding.

- a. The GHG Performance Standard for New Development is not a sector of the inventory, but it contributes toward the reduction target by promoting reductions in multiple sectors. See the Regional Reduction Plan Chapter 4 for a complete description of this measure.
- b. Excluded from target setting and reductions due to lack of jurisdictional control (see Analytical Method section, above).

4.2.51 Draft EIR Chapter 4 Section 4.18.7 (Greenhouse Gas Emissions) [City of Twentynine Palms]

Page 4.18.7-16 (Table 4.18.7-2)

Table 4.18.7-2 GHG Emission Inventories and Reductions in the City of Twentynine Palms					
<i>Category</i>	<i>Metric tons of CO₂e</i>				
Emission Source	2008	2020 BAU	Plan Reductions	2020 with Plan	% Reduction
Energy	34,430	40,471	<u>11,490</u> 11,672	<u>28,981</u> 28,799	<u>28.4%</u> 28.8%
On-Road Transportation	59,176	69,737	18,526	51,211	26.6%
Off-road Equipment	5,494	6,443	771	5,671	12.0%
Wastewater Treatment	4,991	5,919	142	5,777	2.4%
Water Conveyance	2,314	2,314	72	2,242	3.1%
Solid Waste	6,862	9,640	5,195	4,445	53.9%
Agriculture	0	0	0	0	0.0%
GHG Performance Standard for New Development ^a			<u>2,165</u> 1,957		
Total	113,267	134,524	<u>38,361</u> 38,335	<u>96,163</u> 96,189	28.5%
Reduction Target			38,247	96,277	28.4%
Does the Plan Meet the Reduction Target?			Yes	Yes	Yes
Reductions Beyond Target			<u>115</u> 88		
Excluded Stationary Sources under Title V Permits ^b	10,952	12,425			

Values may not sum due to rounding.

- a. The GHG Performance Standard for New Development is not a sector of the inventory, but it contributes toward the reduction target by promoting reductions in multiple sectors. See the Regional Reduction Plan Chapter 4 for a complete description of this measure.
- b. Excluded from target setting and reductions due to lack of jurisdictional control (see Analytical Method section above).

4.2.52 Draft EIR Chapter 4 Section 4.19.7 (Greenhouse Gas Emissions) [City of Victorville]

Page 4.19.7-17 (Table 4.19.7-2)

Table 4.19.7-2 GHG Emission Inventories and Reductions in the City of Victorville					
<i>Category</i>	<i>Metric tons of CO₂e</i>				
Emission Source	2008	2020 BAU	Plan Reductions	2020 with Plan	% Reduction
Energy	442,667	607,252	<u>178,180</u> 184,659	<u>429,072</u> 422,592	<u>29.3%</u> 34.40%
On-Road Transportation	363,283	493,825	136,149	357,676	27.60%
Off-road Equipment	38,613	50,458	8,738	41,720	17.30%
Solid Waste	7,433	10,551	814	9,737	7.70%
Agriculture	9,095	4,635	0	4,635	0.00%
Wastewater Treatment	4,524	5,915	182	5,733	3.10%
Water Conveyance	6,361	21,298	2,371	18,927	11.10%
GHG Performance Standard for New Development ^a	—	—	<u>20,251</u> 44,015	—	—
Total	871,976	1,193,933	<u>346,685</u> 346,928	<u>847,249</u> 847,005	<u>29.0%</u> 29.10%
Reduction Target	—	—	346,241	847,693	29.00%
Does the Plan Meet the Reduction Target?	—	—	yes	yes	yes
Reductions Beyond Target	—	—	<u>444,668</u>	—	—
Excluded Stationary Sources under Title V Permits ^b	2,235,411	2,528,364	—	—	—

Values may not sum due to rounding.

- a. The GHG Performance Standard for New Development is not a sector of the inventory, but it contributes toward the reduction target by promoting reductions in multiple sectors. See the Regional Reduction Plan Chapter 4 for a complete description of this measure.
- b. Excluded from target setting and reductions due to lack of jurisdictional control (see Analytical Method section above).

4.2.53 Draft EIR Chapter 4 Section 4.20.7 (Greenhouse Gas Emissions) [City of Yucaipa]

Page 4.20.7-17 (Table 4.20.7-2)

Table 4.20.7-2 GHG Emission Inventories and Reductions in the City of Yucaipa					
Category/Emission Source	Metric tons of CO ₂ e				
	2008	2020 BAU	Plan Reductions	2020 with Plan	% Reduction
Building Energy	122,591	139,098	<u>29,231</u> 35,462	<u>109,866</u> 103,635	<u>21.0%</u> 25.5%
On-Road Transportation	168,613	176,393	<u>48,711</u> 49,529	<u>127,682</u> 126,864	<u>27.6%</u> 28.1%
Off-Road Equipment	12,035	13,167	1,176	11,991	8.9%
Solid Waste Management	11,875	13,430	233	13,197	1.7%
Agriculture	3,967	2,022	0	2,022	0%
Wastewater Treatment	2,071	2,272	121	2,150	5.3%
Water Conveyance	6,122	11,147	2,303	8,844	20.7%
GHG Performance Standard for New Development	—	—	2,710	—	—
Total	327,274	357,528	<u>84,487</u> 94,535	<u>273,042</u> 265,993	<u>23.6%</u> 25.6%
Reduction Target	—	—	79,346	278,183	22.2%
Does the Plan Meet the Reduction Target?			Yes	Yes	Yes
Reductions Beyond Target	—	—	<u>5,141</u> 42,190	—	—
Excluded Stationary Sources under Title V Permits ^b	23,188	26,466	—	—	—

Values may not sum due to rounding.

- The GHG Performance Standard for New Development is not a sector of the inventory, but it contributes toward the reduction target by promoting reductions in multiple sectors. See the Regional Reduction Plan Chapter 4 for a complete description of this measure.
- Excluded from target setting and reductions due to lack of jurisdictional control (see Analytical Method section, above).

4.2.54 Draft EIR Chapter 4 Section 4.21.7 (Greenhouse Gas Emissions) [Town of Yucca Valley]

Page 4.21.7-17 (Table 4.21.7-2)

Table 4.21.7-2 GHG Emission Inventories and Reductions in the Town of Yucca Valley					
Category	Metric tons of CO₂e				
Emission Source	2008	2020 BAU	Plan Reductions	2020 with Plan	% Reduction
Energy	53,437	62,236	<u>14,091</u> 44,451	<u>48,145</u> 47,785	<u>22.6%</u> 23.20%
On-Road Transportation	71,120	80,427	21,272	59,155	26.40%
Off-road Equipment	6,680	7,419	663	6,757	8.90%
Wastewater Treatment	10,992	12,359	8,172	4,187	66.10%
Water Conveyance	0	0	0	0	0.00%
Solid Waste	4,138	1,522	18	1,504	1.20%
Agriculture	1,677	2,231	30	2,201	1.30%
GHG Performance Standard for New Development ^a			<u>0</u> 1,852		
Total	148,044	166,197	<u>44,245</u> 46,457	<u>121,950</u> 119,737	<u>26.6%</u> 28.00%
Reduction Target			40,357	125,838	24.30%
Does the Plan Meet the Reduction Target?			yes	yes	yes
Reductions Beyond Target			<u>3,888</u> 6,100		
Excluded Stationary Sources under Title V Permits ^b	7.20	7.20		5.20	

Values may not sum due to rounding.

- a. The GHG Performance Standard for New Development is not a sector of the inventory, but it contributes toward the reduction target by promoting reductions in multiple sectors. See the Regional Reduction Plan Chapter 4 for a complete description of this measure.
- b. Excluded from target setting and reductions due to lack of jurisdictional control (see Analytical Method section above).

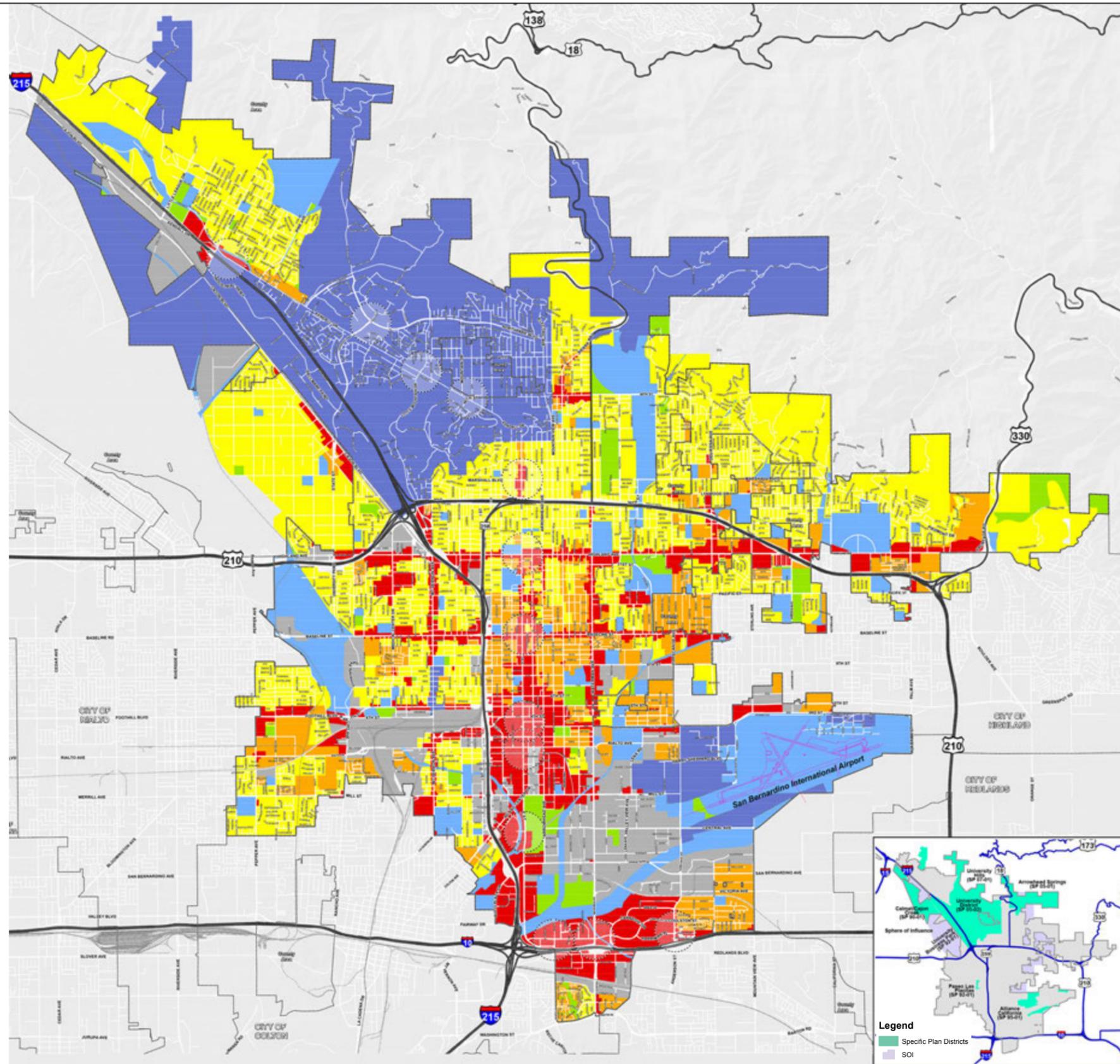
4.2.55 Draft EIR Chapter 4 Section 4.17.10 (Land Use) [City of San Bernardino]

Page 4.17.10-5 City of San Bernardino Land Use Map

The Land Use Map on the next page updates Figure 4.17.10-2 (General Plan Land Use Map) in the EIR

The Draft EIR analyzed future development in year 2020 consistent with the current General Plan Land Uses. However, the Draft EIR inadvertently used an older General Plan Land Use Map as Figure 4.17.10-2. Updating this figure corrects that error. The update of the figure does not constitute significant new information that would change the analysis in the Draft EIR.

Source: City of San Bernardino General Plan.



Legend

- Airport Runways
- Railroad
- City/County Boundary
- General Plan Transit District Overlays
- San Bernardino City Limits
- Specific Plan Districts

General Plan Land Use

General Plan Land Use

- Industrial
- Open Space
- Multiple Family Residential
- Commercial
- Single Family Residential
- Public/Quasi-Public



Figure 4.17.10-2
General Plan Land Use

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