# COUNTY OF SAN BERNARDINO GENERAL PLAN AMENDMENT AND COUNTYWIDE GREENHOUSE GAS (GHG) EMISSIONS REDUCTION PLAN

INITIAL ENVIRONMENTAL STUDY

# Prepared for:

County of San Bernardino Land Use Services Department 385 N. Arrowhead Avenue, First Floor San Bernardino, CA 92415

Prepared by:



SEPTEMBER 2010

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Prepared by:

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**SEPTEMBER 2010** 

### INITIAL ENVIRONMENTAL STUDY

Project Title: County of San Bernardino General Plan Amendment and

Countywide Greenhouse Gas (GHG) Emissions Reduction Plan

Lead Agency Name and

Address:

County of San Bernardino Land Use Services Department

Project Location: Unincorporated areas of San Bernardino County, California

that are under the County's land use authority, as well as all County owned or operated facilities, whether within an incorporated city, town or within an unincorporated area.

Project Sponsor's Name: County of San Bernardino

General Plan Designation(s): Various

Zoning: Various

Contact Person: Doug Feremenga

Phone Number: 909-387-0240

Date Prepared: 09/17/2010

### **PROJECT DESCRIPTION**

### I. PROJECT LOCATION

The total land area that comprises San Bernardino County is approximately 13 million acres. Federal and state agencies own and control 81 percent (10.5 million acres) of the total County lands (approximately 13 million acres) and approximately four (4) percent lies within 24 incorporated cities and is directly regulated by the respective city councils (see Figure 1-1 of the NOP). The GHG Emissions Reduction Plan addresses the reduction of GHG emissions in the unincorporated areas of San Bernardino County, California that are under the County's land use well as all County operational activities and facilities, whether within an incorporated city, town or within an unincorporated area.

### II. HISTORY

Following the County's adoption of its General Plan in March 2007, the California Attorney General filed a lawsuit alleging that the EIR prepared for the General Plan Update did not comply with the requirements of CEQA in its analysis of GHG emissions and climate change. Subsequently, the County and the Attorney General entered into an agreement to settle the lawsuit, which included an agreement by the County to: (1) prepare an amendment to its General Plan adding a policy that describes the County's goal of reducing those GHG emissions

reasonably attributable to the County's discretionary land use decisions and the County's internal government operations; and, (2) prepare a GHG Emissions Reduction Plan, which includes inventories, a reduction target, and, reduction measures to meet the reduction target, by regulating those sources of GHG emissions reasonably attributable to the County's discretionary land use decisions and the County's internal government operations.

### III. PROJECT CHARACTERISTICS

The project consists of the proposed adoption a General Plan Amendment, a GHG Emissions Reduction Plan (GHG Plan) and associated Development Code Amendment to include greenhouse gas emissions reduction policy provisions and specific procedures for implementing development related provisions of the GHG Plan in the development code. The plan and concurrent amendments are briefly described below:

### A. General Plan Amendment

The County will amend its General Plan to include a policy and programs addressing the County's intent to reduce GHG emissions that are reasonably attributable to: (1) the County's internal activities, services and facilities, and (2) private industry and development that is located within the area subject to the County's land use and building permit authority.

### **B.** GHG Emission Reduction Plan

The GHG Plan addresses two distinct categories: (1) County's internal operations ("Internal") and (2) County's land use jurisdiction area ("External") operations. The Internal category simply covers those operational activities, services and facilities that the County has direct responsibility for and control over. Examples include County vehicles and equipment, as well as buildings and other County owned facilities such as airports. External activities are those that the County has indirect influence or regulatory authority over. External sources are essentially private sector development, industry and business in the unincorporated portion of San Bernardino County that are subject to the County's land use authority. The GHG Plan provides different emissions reduction goals, objectives and strategies for these two. External emissions are further differentiated into six sectors that include Building Energy Use, Transportation and Land Use, Solid Waste/Landfills, Stationary Sources, Agriculture and Resource and Conservation, and Water Conservation. The Internal emissions are differentiated into County facilities, County fleet, solid waste, employee commute, and water conservation. The use of these sectors allow for application of more discrete reduction strategies.

The framework of the GHG Plan consists of: (1) an inventory of GHG emissions that identifies and quantifies existing emissions and projected future emissions; (2) a reduction target to reduce existing GHG emissions by 15% by 2020; and, (2) the goals, objectives and strategies that have been devised to reduce existing emissions to meet the reduction target. The County's GHG Plan and its reduction target are consistent with Assembly Bill (AB) 32 and the California Air Resources Board (CARB) recommendations to ensure that California emissions are reduced to 1990 levels by the year 2020. The CARB has 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 plan. For the purpose of defining "existing" emission levels, the County chose the emissions in the year 2007 as baseline, existing emissions conditions.

The GHG emissions reduction measures identified in the Plan include existing and proposed state, regional, county and other local measures that will reduce GHG emission in the Internal

and External categories. Reduction measures have been organized into a classification system that recognizes both the origin of the measures, i.e. state, regional, local, and also whether the measure is quantifiable in terms of calculating a volume of emission reduction.

### **Emission Reduction Classifications**

- Reduction Class 1 All adopted, implemented, and proposed state and regional measures that are capable of producing quantifiable emission reductions.
- Reduction Class 2 All measures currently implemented or proposed for implementation by the County that are capable of producing quantifiable emission reductions.
- Reduction Class 3 Other measures currently implemented or proposed for implementation by the County that are not quantifiable at this point in time, but are recognized as actions that can have a positive effect on GHG emission reduction.

No federal measures were relied upon to achieve the reduction targets included in this plan due to the uncertainty surrounding federal action at this time.

A summary of greenhouse gas reduction measures that are under consideration can be found in Attachment A to the Notice of Preparation document.

### **C.** Development Code Amendments

The project to be considered in the Draft SEIR will also include amendments to the Development Code codifying some of the GHG emissions reduction measures, such as the development review process for new development projects.

### **ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED**

The environmental factors checked below would be potentially affected by this project, as indicated by the checklist and corresponding discussion on the following pages.

$\boxtimes$	Aesthetics		Agricultural Resources and Forestry Resources		Air Quality
$\boxtimes$	Biological Resources		Cultural Resources		Geology / Soils
	Greenhouse Gas Emissions		Hazards & Hazardous Materials		Hydrology / Water Quality
	Land Use / Planning		Mineral Resources		Noise
	Population / Housing		Public Services		Recreation
	Transportation / Traffic	$\boxtimes$	Utilities / Service Systems	$\boxtimes$	Mandatory Findings of Significance

### **PURPOSE OF THIS INITIAL STUDY**

This Initial Study has been prepared consistent with CEQA Guidelines Sections 15162 through 15164 to determine the extent to which the proposed project, including the General Plan Amendment, the GHG Plan, and the associated Development Code amendments, will result new or substantially more severe environmental impacts, or otherwise require preparation of a supplemental EIR, pursuant to the standards set forth in those Guidelines. Based on the analysis in this initial study, The County will be preparing a draft Supplement to the County General Plan Program EIR (GP EIR) (State Clearinghouse No. 2005101038) to address the factors set forth in Guidelines 15162 through 15164, including the extent to which the proposed General Plan Amendment, GHG Plan and associated Development Code Amendments will result in new or substantially more severe environmental impacts. Thus, the draft Supplement to the GP EIR (Draft SEIR) will address the environmental effects of implementing the GHG Plan in light of the previous environmental review in the GP EIR as provided for under CEQA Guidelines 15063(b)(1)(C).

The GP EIR is available for review at the following address:

County of San Bernardino Land Use Services Department 385 N. Arrowhead Avenue, First Floor San Bernardino, CA 92415

The General Plan Amendment is proposed to add policies to the General Plan specifically calling for the reduction of greenhouse gas emissions. The GHG Plan is proposed as a measure to implement the General Plan, including the proposed greenhouse gas policies to be added, and is not a revision to the overall policy framework and land use pattern of the General Plan. The environmental analysis will assess whether the measures and strategies of the GHG Plan will cause a direct or indirect physical effect on the environment. The Draft SEIR will not analyze the impacts of environmental issues associated with implementation of the General Plan (such as growth within the County) as they were addressed in the GP EIR and are not associated with implementation of the GHG Plan.

### **EVALUATION OF ENVIRONMENTAL IMPACTS**

Pursuant to CEQA Guidelines Sections 15162 through 15164, the analysis provided below utilizes CEQA Guidelines Appendix G and the analysis from the GP EIR and makes the following possible determinations:

- 1. "Less Than Significant or No Impact" the impact simply does not apply to the project.
- 2. "Impact Adequately Addressed in Program EIR" the project would not result in a new or increased severity of an environmental impact that was addressed in the General Plan Program EIR.
- 3. "Less Than Significant Impact Due to Project Measures" the project contains measures that address and mitigate the potential impact.
- 4. "Potentially New or Increased Severity of a Significant Impact Not Addressed in Program EIR" the project may result in a significant new or increased severity of an environmental impact not considered in the General Plan Program EIR.

I.	AESTHETICS ould the project:	Potentially New or Increased Severity of a Significant Impact Not Addressed in Program EIR	Less Than Significant Impact Due to Project Measures	Impact Adequately Addressed in Program EIR	Less Than Significant or No Impact
a)	Have a substantial adverse effect on a scenic vista?				
b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				
c)	Substantially degrade the existing visual character or quality of the site and its surroundings?				
d)	Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?				

**Source:** County of San Bernardino GP EIR

### Discussion/Conclusion

According to the County of San Bernardino GP EIR (GP EIR), there is a potential for implementation of the General Plan to impact local scenic resources and vistas. The GP EIR proposed mitigation measures to reduce the General Plan's impacts to scenic resources, and

a-d) Potentially New or Increased Severity of a Significant Impact Not Addressed in Program EIR.

proposed mitigation measures to reduce the General Plan's impacts to scenic resources, and concluded that the impacts would be The GP EIR includes mitigation measures that will partially mitigate this impact. Although adverse effects related to scenic vistas and resources were addressed in the GP EIR, there are numerous interstate routes, state highways, county roads and roads on federal lands are either designated scenic highways or byways. The GP EIR found that development of the plan area would potentially result in significant impacts to scenic vistas or scenic resources. Adverse effects on views due to the creation of new sources of substantial light or glare were addressed in the GP EIR. It was determined that implementation of the General Plan would result in a potentially significant impact to the existing views due to the creation of new sources of substantial light or glare. The GP EIR proposed a mitigation measure that requires the use of the Glare and Outdoor Lighting section of the Development Code to help preserve dark skies in the Mountain and Desert Regions of the County. The GP EIR concluded that despite the imposition of mitigation measures these impacts cannot be fully mitigated to a level below significance.

Implementation of reduction measures in the GHG Plan will have a potentially significant impact on scenic highways and resources, degrade existing visual resources and introduce new sources of light and glare. For example, the installation of solar photovoltaic panels (e.g., Residential Retrofit Solar Incentives and Warehouse Solar Incentive Program) may have impacts to scenic vistas and resources, or degrade existing visual character of introduce new sources of light and glare. Therefore, these new potential impacts will be addressed in the Draft SEIR.

II.	AGRICULTURE RESOURCES				
agr env refe Eva (19 De opt imp	determining whether impacts to icultural resources are significant vironmental effects, lead agencies may be to the California Agricultural Land alluation and Site Assessment Model 97), prepared by the California partment of Conservation as an ional model to use in assessing pacts on agriculture and farmland.	Potentially New or Increased Severity of a Significant Impact Not Addressed in Program EIR	Less Than Significant Impact Due to Project Measures	Impact Adequately Addressed in Program EIR	Less Than Significant or No Impact
a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				
b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?				
с)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				
d)	Result in the loss of forest land or conversion of forest land to non-forest use?				
e)	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				

### **Discussion/Conclusion**

a-e) Potentially New or Increased Severity of a Significant Impact Not Addressed in Program EIR. Adverse effects related to the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, conflict with existing zoning for agricultural use or Williamson Act contracts, or involving changes in the existing environment which could result in conversion of Farmland, to non-agricultural use were addressed in the GP EIR, which found that development of the plan area would result in impacts to agricultural resources and mitigation measures will

partially mitigate this impact. Mitigation measures that were included in the EIR only partially mitigate impacts to agricultural resources. The measures require the following: the protection of prime agricultural lands from the adverse effects of urban encroachment; the avoidance of highly alkaline soils for agricultural uses; allowance for the development of prime agricultural lands only after the supply of non-productive areas has been exhausted; use of the Williamson Act to preserve commercially viable agricultural areas; and County support of property and estate tax relief measures that assess long-term agriculture at farm-use value. Additionally, the County will encourage agriculture use of commercially productive agricultural lands and discourage city sphere of influence extensions into areas containing commercially productive agricultural lands. The GP EIR concluded that despite the imposition of mitigation measures these impacts cannot be fully mitigated to a level below significance.

There is a potential for the implementation of reduction measures in the GHG Plan to have further impacts to agricultural lands and uses. For example, the siting of new renewable energy generating facilities and supporting facilities (e.g., Renewable Portfolio Standard) may have impacts to agricultural lands and uses. Therefore, these new impacts will be addressed in the Draft SEIR. Additionally, the Draft SEIR will include a discussion of potential impacts to forestland or forestland conversion associated with GHG Plan implementation of reduction measures.

Ш	AIR QUALITY				
esta ma dist foll	nere available, the significance criteria ablished by the applicable air quality nagement or air pollution control crict may be relied upon to make the owing determinations.	Potentially New or Increased Severity of a Significant Impact Not Addressed in Program EIR	Less Than Significant Impact Due to Project Measures	Impact Adequately Addressed in Program EIR	Less Than Significant or No Impact
a)	Conflict with or obstruct implementation of the applicable air quality plan?				
b)	Violate any air quality standard or contribute substantially to an existing or projected air quality violation?				
c)	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?				
d)	Result in significant construction- related air quality impacts?	$\boxtimes$			
e)	Expose sensitive receptors to substantial pollutant concentrations?			$\boxtimes$	
f)	Create objectionable odors affecting a substantial number of people?			$\boxtimes$	

### Discussion/Conclusion

**a-c)** Impact Adequately Addressed in Program EIR. Adverse effects on associated with growth facilitated by the update of the General Plan will result in the construction of new roads and infrastructure and the increased urbanization of agricultural lands leading to increased emissions. Growth will also create emissions that affect sensitive populations (e.g., those with respiratory illness and the older population). The GP EIR includes mitigation measures that will partially mitigate this impact.

The purpose of the GHG Plan is to aggressively reduce GHG emissions within the County, therefore implementation of the plan would not result in a potentially significant impact by conflicting with or obstructing the implementation of the applicable air quality plan South Coast Air Quality Management District (SCAQMD) or Mojave Desert Air Quality Management District (MDAQMD) plans; violate air quality standard; or contribute substantially to an existing or projected air quality violation or result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors). This determination was made based upon the nature that reduction

measures in the GHG Plan include several measures that would further assist in improving air quality (e.g., reduction measures "Anti-Idling Enforcement Policy", "Expand Renewable Fuel/Low-Emission Vehicle Use", and "Current Fleet Turnover Proposed by County"). These impacts will not be addressed in the Draft SEIR.

d) Potentially New or Increased Severity of a Significant Impact Not Addressed in Program EIR. Adverse impacts associated with construction emissions were addressed in the previous environmental documents prepared for the GP EIR, which found that growth facilitated by the update of the General Plan will result in the construction of new roads and infrastructure and the increased urbanization of agricultural lands leading to increased emissions. The GP EIR includes mitigation measures that will partially mitigate this impact.

There is the potential for construction activities to occur when implementing the reduction measures of the GHG Plan. The GP EIR includes mitigation measures that will partially mitigate this impact. The result of these activities could potentially result in significant construction-related air quality impacts. This new impact will be addressed in the Draft SEIR.

- e) Impact Adequately Addressed in Program EIR. Adverse impacts associated with carbon monoxide concentrations were addressed in the previous environmental documents prepared for the GP EIR, which found that new vehicle trips add to carbon monoxide concentrations near streets providing access to, from, and within the project site. The GP EIR includes mitigation measures that will partially mitigate this impact. The project is located in an area with low background carbon monoxide concentrations. San Bernardino County is in an attainment area for the carbon monoxide ambient standards. State protocol for carbon monoxide studies provides that within attainment areas for carbon monoxide, signalized intersections having a Level of Service (LOS) of E or F represent a potential CO violation and require further analysis. Because the project is not proposing additional traffic trips, but instead provides traffic trip reduction measures through policies, programs or discrete actions identified in the GHG Plan. Therefore, these impacts will not be addressed in the Draft SEIR.
- f) Impact Adequately Addressed in Program EIR. Adverse impacts associate with increased odors on downwind receptors was addressed in previous environmental documents prepared for the GP EIR. The proposed project is not expected to result in substantial odors for downwind receptors. The GP EIR includes mitigation measures that will partially mitigate this impact. Air pollution control district nuisance regulations would ensure that any substantial releases of odors would be eliminated pursuant to enforcement actions. Therefore, these impacts will not be addressed in the Draft SEIR.

IV.	BIOLOGICAL RESOURCES	Potentially New or Increased Severity of a Significant Impact Not Addressed in Program EIR	Less Than Significant Impact Due to Project Measures	Impact Adequately Addressed in Program EIR	Less Than Significant or No Impact
a)	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	$\boxtimes$			
b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	$\boxtimes$			
c)	Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				
d)	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	$\boxtimes$			
e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				
f)	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				

### **DISCUSSION/CONCLUSION**

a) Potentially New or Increased Severity of a Significant Impact Not Addressed in Program EIR. The GP EIR found the potential for adverse effects on special status species that may occur within the Valley, Mountain Desert regions of the County. The EIR included a biological assessment of these species. The GP EIR adopted mitigation measures the fully mitigated this impact.

However, there is a potential for the implementation of reduction measures in the GHG Plan to have further impacts to special status species. For example, the siting of new renewable energy generating facilities and supporting facilities (e.g., reduction measure "Renewable Portfolio Standard") may have impacts to special-status species and their associated habitats both in regards to ground disturbance and operation (e.g., conflicts with wind turbines and birds). Other reduction measures also have the potential to impact special-status species. Therefore, these new impacts will be addressed in the Draft SEIR.

b) Potentially New or Increased Severity of a Significant Impact Not Addressed in Program EIR. Adverse effects on riparian habitat or other sensitive natural communities were addressed in the previous environmental documents prepared for the GP EIR which found that development allowed by the General Plan Update will adversely impact riparian habitat or other sensitive natural communities as identified by state and federal agencies in the Valley, Mountain and Desert Regions of the County. The GP EIR includes mitigation measures that will partially mitigate this impact.

There is a potential for the implementation of reduction measures in the GHG Plan to have further impacts to riparian habitat or other sensitive natural communities. For example, the siting of new renewable energy generating facilities and supporting facilities (e.g., reduction measure "Renewable Portfolio Standard") may have impacts to riparian habitat or other sensitive natural communities. Other reduction measures also have the potential to impact sensitive natural communities. Therefore, these new impacts will be addressed in the Draft SEIR.

c) Potentially New or Increased Severity of a Significant Impact Not Addressed in Program EIR. Adverse effects on wetlands were addressed in the previous environmental documents prepared for the GP EIR, which found that development of the plan area would result in a potentially significant impact to wetlands in the plan area. It determined that mitigation reduced the impact to the loss of wetlands and the deposition of pollutants and sediments in sensitive wetland habitats to less than significant.

There is a potential for the implementation of reduction measures in the GHG Plan to have further impacts to wetland resources. For example, the siting of new renewable energy generating facilities and supporting facilities (e.g., reduction measure "Renewable Portfolio Standard") may have impacts to wetlands. Other reduction measures also have the potential to impact wetland resources. Therefore, these new impacts will be addressed in the Draft SEIR.

d) Potentially New or Increased Severity of a Significant Impact Not Addressed in Program EIR. Adverse effects on migratory wildlife corridors were addressed in the previous environmental documents prepared for the San Bernardino County General Plan, which found that development of the plan area would result in a potentially significant impact to migratory wildlife corridors. It determined that mitigation reduced the impact to wildlife corridors to less than significant.

However, there is a potential for the implementation of reduction measures in the GHG Plan to have further impacts to migratory wildlife corridors and movement. For example, the siting of new renewable energy generating facilities and supporting facilities such as transmission lines (e.g., reduction measure "Renewable Portfolio Standard") may have impacts to migratory wildlife corridors and movement. Other reduction measures also have the potential to impact migratory wildlife corridors and movement. Therefore, these new impacts will be addressed in the Draft SEIR.

e, f) Potentially New or Increased Severity of a Significant Impact Not Addressed in Program EIR. Adverse effects on local policies or ordinances protecting biological resources and Habitat Conservation Plans (HCP's) were addressed previous environmental documents prepared for the GP EIR, which found that development of the plan area will not conflict with local policies or ordinances protecting biological resources. It determined that mitigation reduced the impact to wildlife corridors to less than significant.

Although is it not expected that the proposed GHG Plan would conflict with on local policies or ordinances protecting biological resources and Habitat Conservation Plans (HCP's), this issue will be further evaluated in the Draft SEIR given the potential for facilities and improvements to result in significant biological resource impacts as noted above.

	CULTURAL RESOURCES ould the project:	Potentially New or Increased Severity of a Significant Impact Not Addressed in Program EIR	Less Than Significant Impact Due to Project Measures	Impact Adequately Addressed in Program EIR	Less Than Significant or No Impact
a)	Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5?	$\boxtimes$			
b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?	$\boxtimes$			
c)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	$\boxtimes$			
d)	Disturb any human remains, including those interred outside of formal cemeteries?	$\boxtimes$			

### **Discussion/Conclusion**

**a-d)** Potentially New or Increased Severity of a Significant Impact Not Addressed in Program EIR. Adverse effects on historic, cultural, and paleontological resources and human remains were addressed in the previous environmental documents prepared for the GP EIR, which found that development of the plan area would result in a potentially significant impact to historic resources. It was determined that with mitigation measures, these impacts can be reduced to less than significant.

However, there is a potential for the implementation of reduction measures in the GHG Plan to have further significant impacts on historic, archaeological, and paleontological resources as well as human remains. For example, the installation of solar photovoltaic panels (e.g., reduction measure "Residential Retrofit Solar Incentives") may have impacts to historic structures, while the siting of new renewable energy generating facilities and supporting facilities such as transmission lines (e.g., reduction measure "Renewable Portfolio Standard") may have impacts to archaeological and paleontological resources as well as human remains. Therefore, these new impacts will be addressed in the Draft SEIR.

	. GEOLOGY AND SOILS ould the project:	Potentially New or Increased Severity of a Significant Impact Not Addressed in Program EIR	Less Than Significant Impact Due to Project Measures	Impact Adequately Addressed in Program EIR	Less Than Significant or No Impact
a)	Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
	i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.			$\boxtimes$	
	ii) Strong seismic ground shaking?			$\boxtimes$	
	<ul><li>iii) Seismic-related ground failure, including liquefaction?</li></ul>			$\boxtimes$	
	iv) Landslides?			$\boxtimes$	
b)	Result in substantial soil erosion or the loss of topsoil?			$\boxtimes$	
c)	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in onor off-site landslide, lateral spreading, subsidence, liquefaction or collapse?				
d)	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?			$\boxtimes$	
e)	Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?			$\boxtimes$	

### DISCUSSION/CONCLUSION

**a-e)** Impact Adequately Addressed in Program EIR. Adverse effects related to geologic conditions, impacts and soils were addressed in the previous environmental documents prepared for the prepared for the San Bernardino County General PI GP EIR, which found that development of the plan area would result in a potentially significant impacts related to geological conditions and soil conditions. It was determined by the General Plan EIR, all impacts associated with geological and soils conditions could be mitigated to below a level of significance.

The GHG Plan does not result in any new development potential or construction of facilities that would be impacted by these conditions beyond what the GP EIR considered. Implementation of projects and activities under the GHG Plan would be subject to all of the County development standards regarding seismic and geologic stability. These impacts will not be addressed in the Draft SEIR.

VII. GREENHOUSE GAS EMISSIONS Would the project:	Potentially New or Increased Severity of a Significant Impact Not Addressed in Program EIR	Less Than Significant Impact Due to Project Measures	Impact Adequately Addressed in Program EIR	Less Than Significant or No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				

### **DISCUSSION/CONCLUSION**

**a-b)** Less Than Significant or No Impact. This project is intended to reduce GHG emissions, consistent with AB 32, thus the project is expected to have beneficial impacts. The Draft SEIR will provide further details on the proposed GHG Reduction Plan and the measures to meet its targets consistent with AB 32.

HA	II. HAZARDS AND AZARDOUS MATERIALS  build the project:	Potentially New or Increased Severity of a Significant Impact Not Addressed in Program EIR	Less Than Significant Impact Due to Project Measures	Impact Adequately Addressed in Program EIR	Less Than Significant or No Impact
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				
b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?				
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				
d)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?			$\boxtimes$	
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?			$\boxtimes$	
f)	For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?			$\boxtimes$	
g)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				

H	III. HAZARDS AND AZARDOUS MATERIALS ould the project:	Potentially New or Increased Severity of a Significant Impact Not Addressed in Program EIR	Less Than Significant Impact Due to Project Measures	Impact Adequately Addressed in Program EIR	Less Than Significant or No Impact
h)	Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?			$\boxtimes$	

### Discussion/Conclusion

a) Impact Adequately Addressed in Program EIR. Adverse effects related to the routine transport, use, or disposal of hazardous materials and accident conditions involving the release of hazardous materials into the environment were addressed in the previous environmental documents prepared for the GP EIR, which found that with mitigation, development of the plan area would result in a less than significant impact related to the routine transport, use, or disposal of hazardous materials and accident conditions involving the release of hazardous materials into the environment.

The GHG Plan does not result in any new development potential or construction of facilities that require the routine transportation of hazardous materials that would be impacted by these conditions beyond what the GP EIR considered. Implementation of projects and activities under the GHG Plan would be subject to all local, state and federal standards regarding the transportation, use and disposal of hazardous materials. These impacts will not be addressed in the Draft SEIR.

### b, c) Potentially New or Increased Severity of a Significant Impact Not Addressed in Program EIR

Adverse effects related to significant hazardous conditions due to risk of upset and accidents were addressed in the previous environmental documents prepared for the in the previous environmental documents prepared for the prepared for the GP EIR, which found that with mitigation, development of the plan area would result in a less than significant impact due to hazardous conditions.

However, there is the potential for significant hazardous conditions to be exposed to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment when implementing the GHG Plan. The result of these activities could potential result in significant hazardous conditions through the creation of methane recovery systems at landfills (e.g., reduction measure "Increase Methane Recovery at Mid-Valley, Milliken, and Colton Landfills") as well as disturbance of lead-based paint and asbestos containing materials from residential retrofits (e.g., reduction measure "Residential Energy Efficiency Retrofits"). This new impact will be addressed in the Draft SEIR.

d, e, f, g, h) Impact Adequately Addressed in Program EIR. Adverse effects related to being located on a listed hazardous materials site; located near a public or private airport; interfere with an adopted emergency response plan; or expose people or structures to wildland fires were all

addressed in the in the previous environmental documents prepared for the GP EIR, which found that development of the plan area would result in a potentially significant impacts in the aforementioned issue areas. It was determined by the General Plan EIR, all impacts associated with public or private airport; interference with an adopted emergency response plan; or expose people or structures to wildland fires could be mitigated to below a level of significance.

The GHG Plan does not result in any new development potential or construction of facilities that would increase these types of hazardous conditions beyond what the GP EIR considered. Implementation of projects and activities under the GHG Plan would be subject to all local, state and federal policies and standards regarding hazards, airports, emergency response and evacuation plans, and wildfires. These impacts will not be addressed in the Draft SEIR.

IX. HYDROLOGY AND WATER QUALITY Would the project:		Potentially New or Increased Severity of a Significant Impact Not Addressed in Program EIR	Less Than Significant Impact Due to Project Measures	Impact Adequately Addressed in Program EIR	Less Than Significant or No Impact
a)	Violate any water quality standards or waste discharge requirements?			$\boxtimes$	
b)	Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?				
C)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?			$\boxtimes$	
d)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?				
e)	Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?				
f)	Otherwise substantially degrade water quality?			$\boxtimes$	

QI	HYDROLOGY AND WATER UALITY build the project:	Potentially New or Increased Severity of a Significant Impact Not Addressed in Program EIR	Less Than Significant Impact Due to Project Measures	Impact Adequately Addressed in Program EIR	Less Than Significant or No Impact
g)	Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map? (Source:			$\boxtimes$	
h)	Place within a 100-year flood hazard area structures which would impede or redirect flood flows?				
i)	Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?			$\boxtimes$	
j)	Inundation by seiche, tsunami, or mudflow?			$\boxtimes$	

### Discussion/Conclusion

**a**, **c**, **e**, **f**) *Impact Adequately Addressed in Program EIR*. Adverse effects related to the soil erosion and water quality impacts were addressed in the previous environmental documents prepared for the GP EIR, which found that with mitigation, development of the plan area would result in a less than significant impact.

The GHG Reduction Plan does not result in any new development potential or construction of facilities that would impact water quality beyond what the GP EIR considered. Implementation of projects and activities under the GHG Plan would be subject to all of the County development standards regarding water quality. These impacts will not be addressed in the Draft SEIR.

b) Potentially New or Increased Severity of a Significant Impact Not Addressed in Program EIR. Adverse effects related to the depletion of groundwater requirements were addressed in the previous environmental documents prepared for the GP EIR, which found that with mitigation, development of the plan area would result in a less than significant impact related to groundwater supplies and interference with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. Adopted mitigation measures and conditions of approval prepared for the General Plan and GP EIR reduce this impact to less than significant.

There is a potential for the implementation of reduction measures in the GHG Plan to have further significant impacts groundwater resources. For example, siting of new renewable energy

generating facilities and supporting facilities (e.g., reduction measure "Renewable Portfolio Standard") may increase groundwater usage. Therefore, these new impacts will be addressed in the Draft SEIR.

**d**, **g**, **h**, **i**, **j**) *Impact Adequately Addressed in Program EIR*. Adverse effects related to alteration of the existing drainage pattern of the plan area resulting in flooding, flooding hazards and inundation by seiche, tsunami or mudflow were addressed in the previous environmental documents prepared for the for the GP EIR. The GP EIR found that these impacts are considered to be less than significant with the implementation of the mitigation measures.

The GHG Reduction Plan does not result in any new development potential or construction of facilities that would trigger additional flooding and drainage hazards beyond what the GP EIR considered. Implementation of projects and activities under the GHG Plan would be subject to all of the County development standards regarding drainage and placement of structures within the 100-year floodplain. These impacts will not be addressed in the Draft SEIR.

	LAND USE AND PLANNING ould the project:	Potentially New or Increased Severity of a Significant Impact Not Addressed in Program EIR	Less Than Significant Impact Due to Project Measures	Impact Adequately Addressed in Program EIR	Less Than Significant or No Impact
a)	Physically divide an established community?				$\boxtimes$
b)	Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?				
c)	Conflict with any applicable habitat conservation plan or natural community conservation plan?				

### Discussion/Conclusion

**a-c)** Less Than Significant or No Impact. Adverse effects related to physically dividing an established community, conflict with applicable land use plans, policies or regulations and impacts to habitat conservation plans or natural community conservation plans were addressed in the previous environmental documents prepared for the GP EIR, which found that development of the plan area would result in no impacts related to physically dividing an established community.

The GHG Plan does not result in any new development potential or construction of facilities and it would function as an implementation tool of the General Plan and does not modify designated land uses or patterns or policy provisions. These impacts will not be addressed in the Draft SEIR. The reader is referred to IV. Biological Resources for an analysis of consistency with a habitat conservation plan or natural community conservation plan.

	MINERAL RESOURCES	Potentially New or Increased Severity of a Significant Impact Not Addressed in Program EIR	Less Than Significant Impact Due to Project Measures	Impact Adequately Addressed in Program EIR	Less Than Significant or No Impact
a)	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				
b)	Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				

### **Discussion/Conclusion**

**a, b)** Less Than Significant or No Impact. Adverse effects on mineral resources were addressed in the previous environmental documents prepared for the GP EIR, which found that development of the plan area would result in a less than significant impact to the loss of availability of a known mineral resource or resource recovery site with the implementation of mitigation measures.

The GHG Plan does not result in any new development potential or construction of facilities that would propose changes to designated mineral resource areas beyond what the GP EIR considered. These impacts will not be addressed in the Draft SEIR.

	. NOISE  ould the project result in:	Potentially New or Increased Severity of a Significant Impact Not Addressed in Program EIR	Less Than Significant Impact Due to Project Measures	Impact Adequately Addressed in Program EIR	Less Than Significant or No Impact
a)	Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?				
b)	Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?				
c)	A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?				
d)	A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?				
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				
f)	For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?				$\boxtimes$

### **DISCUSSION/CONCLUSION**

**a-d)** Potentially New or Increased Severity of a Significant Impact Not Addressed in Program EIR. Adverse impacts associated with noise were addressed in the previous environmental documents prepared for the GP EIR, which found that development of the plan area would result in a less than significant impact to the sensitive receptors due to vehicular traffic noise with the implementation of mitigation measures.

However, there is a potential for the implementation of reduction measures in the GHG Plan to have further noise impacts. The siting of new renewable energy generating facilities and

supporting facilities (e.g., reduction measure "Renewable Portfolio Standard") may generate excessive noise from construction and operation, as well as from roadway and transit improvements (e.g., reduction measures "Roadway Improvements including Signal Synchronization and Traffic Flow Management" and "Public Transit Measures"). Therefore, these new impacts will be addressed in the Draft SEIR.

### e-f) Less Than Significant or No Impact.

Adverse impacts associated with airport noise were addressed in the previous environmental documents prepared for the GP EIR, which found that development of the plan area would result in a less than significant impact to the sensitive receptors due to airport noise with the implementation of mitigation measures

The GHG Plan would not alter land uses in the vicinity of public or private airports that could expose people to airport noise. This issue will not be addressed in the Draft SEIR.

НС	II. POPULATION AND DUSING ould the project:	Potentially New or Increased Severity of a Significant Impact Not Addressed in Program EIR	Less Than Significant Impact Due to Project Measures	Impact Adequately Addressed in Program EIR	Less Than Significant or No Impact
a)	Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			$\boxtimes$	
b)	Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				
c)	Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?			$\boxtimes$	

### Discussion/Conclusion

**a-c)** Impact Adequately Addressed in Program EIR. Adverse impacts associated with noise were addressed in the previous environmental documents prepared for the GP EIR, which found that an increase in population and housing in the County will result in a less than significant impact to the with the implementation of mitigation measures.

The GHG Plan does not result in any new development, changes in population, potential or construction of facilities that would propose land use changes beyond what the GP EIR considered. This issue will not be address in the Draft SEIR.

	PUBLIC SERVICES build the project result in:	Potentially New or Increased Severity of a Significant Impact Not Addressed in Program EIR	Less Than Significant Impact Due to Project Measures	Impact Adequately Addressed in Program EIR	Less Than Significant or No Impact		
Suk	Substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:						
a)	Fire protection?	$\boxtimes$					
b)	Police protection?			$\boxtimes$			
c)	Schools?			$\boxtimes$			
d)	Parks?			$\boxtimes$			
e)	Other public facilities?			$\boxtimes$			

### Discussion/Conclusion

a) Potentially New or Increased Severity of a Significant Impact Not Addressed in Program EIR. Adverse effects related to fire protection services were addressed in the previous environmental documents prepared for the GP EIR, which found that development under the General Plan will result in growth and development in the unincorporated communities of San Bernardino County that will result in an increase in demand for fire protection services and this impact can be reduced to less than significant with mitigation.

Nevertheless, reduction measures under The GHG Plan could trigger additional fire protection services beyond what was considered in the General Plan EIR. This impact will be addressed in the Draft SEIR.

**b-e)** Impact Adequately Addressed in Program EIR. Adverse effects related to law enforcement services, public schools, parks and other governmental services were addressed in the previous environmental documents prepared for the GP EIR, which found that development under the General Plan will result in an increase in population and human activity in the area and will result in an increase in the need for law enforcement services and this impact can be reduced to less than significant with mitigation.

The GHG Plan does not result in any new development potential, population increase, or construction of facilities that would propose land use changes beyond what the GP EIR considered that would trigger additional or altered need for these public services. These impacts will not be addressed in the Draft SEIR.

	. RECREATION ould the project:	Potentially New or Increased Severity of a Significant Impact Not Addressed in Program EIR	Less Than Significant Impact Due to Project Measures	Impact Adequately Addressed in Program EIR	Less Than Significant or No Impact
a)	Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				$\boxtimes$
b)	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				

### **Discussion/Conclusion**

**a, b)** Less Than Significant or No Impact. Adverse impacts associated with development allowed under the General Plan were addressed in the GP EIR, which found that this impact may result in the need to add more park space and recreational trails to serve the project. The GP EIR found this impact can be fully mitigated.

The GHG Plan does not result in any new development potential, population increase, or construction of facilities that would result in recreation facility or service impacts. These impacts will not be addressed in the Draft SEIR.

	I. TRANSPORTATION/TRAFFIC buld the project:	Potentially New or Increased Severity of a Significant Impact Not Addressed in Program EIR	Less Than Significant Impact Due to Project Measures	Impact Adequately Addressed in Program EIR	Less Than Significant or No Impact
a)	Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit)?				
b)	Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?			$\boxtimes$	
c)	Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?				$\boxtimes$
d)	Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			$\boxtimes$	
e)	Result in inadequate emergency access?			$\boxtimes$	
f)	Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?			$\boxtimes$	

### DISCUSSION/CONCLUSION

**a and b)** Impact Adequately Addressed in Program EIR. Adverse impacts associated with traffic performance standards and policies were addressed in the GP EIR, which found that the General Plan may result in roadway operations at LOS E or F in the Valley or Mountain Regions, or at LOS D, E, or F in the Desert Region. The GP EIR found this impact can be fully mitigated.

The GHG Plan does not result in any new development potential or construction of facilities that would propose land use changes beyond what the GP EIR considered that would generate substantial new traffic. Additionally, implementation of the GHG Plan reduction measures will promote the reduction of vehicle miles traveled (e.g., reduction measures "Employment Based Trip and VMT Reductions Policy" and "Bicycle/Pedestrian Infrastructure and Promotion") will thereby reducing traffic impacts, which is a beneficial impact. This impact will not be addressed in the Draft SEIR.

c) Less Than Significant or No Impact. Adverse impacts associated with additional demand at Ontario International Airport and an increase in demand for air freight services will also result in increased air traffic levels at the Southern California Logistics Airport and San Bernardino International Airport were addressed in the GP EIR, which found these impacts could be reduced to less than significant with mitigation.

The GHG Plan does not result in any new development potential or construction of facilities that would propose land use changes that would alter air traffic patterns. This impact will not be addressed in the Draft SEIR.

**d)** Impact Adequately Addressed in Program EIR. Adverse impacts associated with potentially increasing hazardous conditions on roadways were addressed in the environmental documents prepared for the GP EIR, which found these impacts could be recued to less than significant with mitigation.

The GHG Reduction Plan does not result in any new development potential or construction of facilities that would propose land use changes that are expected to alter roadway designs that would increase hazards. All roadway improvements under the reduction measures would still be subject to County roadway design standards. This impact will not be addressed in the Draft SEIR.

**e)** Impact Adequately Addressed in Program EIR. Adverse impacts associated with potentially emergency access were addressed in the environmental documents prepared for the GP EIR, which found these impacts could be recued to less than significant with mitigation.

The GHG Plan does not result in any new development potential or construction of facilities that would increase these types of hazardous conditions beyond what the GP EIR considered. Implementation of projects and activities under the GHG Plan would be subject to all local, state and federal policies and standards regarding emergency response and evacuation plans. This impact will not be addressed in the Draft SEIR.

**f)** Impact Adequately Addressed in Program EIR. Adverse impacts associated with proposed land uses conflicting with conflict with transit, bicycle or pedestrian facilities were addressed in the environmental documents prepared for the GP EIR, which found these impacts could be recued to less than significant with mitigation.

The GHG Plan does not result in any new development potential or construction of facilities that would propose land use changes beyond what the GP EIR considered that would conflict with

transit, bicycle or pedestrian facilities. Additionally, implementation of the GHG Plan reduction measures will promote transit, pedestrian and bicycle uses (e.g., reduction measures "Public Transit Measures" and "Bicycle/Pedestrian Infrastructure and Promotion") will thereby reducing traffic impacts, which is a beneficial impact. This impact will not be addressed in the Draft SEIR.

SY	YII. UTILITIES AND SERVICE STEMS ould the project:	Potentially New or Increased Severity of a Significant Impact Not Addressed in Program EIR	Less Than Significant Impact Due to Project Measures	Impact Adequately Addressed in Program EIR	Less Than Significant or No Impact
a)	Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?			$\boxtimes$	
b)	Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				
c)	Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	$\boxtimes$			
d)	Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	$\boxtimes$			
e)	Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				
f)	Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?				
g)	Comply with federal, state, and local statutes and regulations related to solid waste?				$\boxtimes$

### DISCUSSION/CONCLUSION/MITIGATION

**a)** Impact Adequately Addressed in Program EIR. Adverse impacts associated with violating water quality standards were addressed in the environmental documents prepared for the GP EIR, which found these impacts could be recued to less than significant with mitigation.

The GHG Reduction Plan does not result in any new development potential or construction of facilities that would violate water quality standards beyond what the GP EIR considered. Implementation of projects and activities under the GHG Plan would be subject to all of the County development standards regarding water quality. These impacts will not be addressed in the Draft SEIR.

b-e) Potentially New or Increased Severity of a Significant Impact Not Addressed in Program EIR. Adverse effects related to the requirement of new water, wastewater treatment facilities or storm drain facilities were addressed in the previous environmental documents prepared for the GP EIR, which found that development of the plan area would require the construction of new water, wastewater treatment facilities or storm drain facilities or expansion of existing facilities, the construction of which could cause significant environmental effects, but the impacts can be reduced to below a level of significance with mitigation.

Nevertheless, implementation of the GHG Plan reduction measures could require the construction of additional water supply as well as additional water, wastewater, drainage and other utility facilities not previously considered in the General Plan EIR. These new impacts will be addressed in the Draft SEIR.

**f and g)** Less Than Significant or No Impact. Adverse impacts associated with solid waste generation were addressed in the environmental documents prepared for the GP EIR, which found these impacts could be recued to less than significant with mitigation

The GHG Plan includes reduction measures that would further reduce solid waste generation consistent with local, state and federal regulations. This includes reduction measure, County Diversion Programs – 75 Percent Goal. These impacts will not be addressed in the Draft SEIR.

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE Does the project:		Potentially New or Increased Severity of a Significant Impact Not Addressed in Program EIR	Less Than Significant Impact Due to Project Measures	Impact Adequately Addressed in Program EIR	Less Than Significant or No Impact
a)	Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?				
b)	Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?				
c)	Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?				

### **DISCUSSION/CONCLUSION**

As noted in the above checklist discussion, the proposed GHG Plan does have the potential to result in project and cumulative impacts to biological resources, cultural resources as well as to human beings. The Draft SEIR will further address these issues.

### **REFERENCES**

San Bernardino County General Plan, March 13, 2007

GP EIR Draft EIR, September 2006

GP EIR Final EIR, February 2007

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