

# CITY OF CORONA

# CLIMATE ACTION PLAN

## Environmental Impact Report

SCH No. 2011061054

*Volume II: Changes to the Draft EIR, Response to Comments,  
and Mitigation Monitoring Program*

*Prepared for*



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# CHAPTER 8 Introduction to the Final EIR

## 8.1 PUBLIC REVIEW PROCESS

The Draft EIR for the proposed City of Corona Climate Action Plan (C-CAP) project was circulated for review and comment by the public, agencies, and organizations for a 45-day public review period that began on February 27, 2012, and concluded on April 12, 2012. During this review period, one written comment letter was received on the Draft EIR.

## 8.2 CEQA REQUIREMENTS

The Lead Agency (the City of Corona) must provide each public agency that commented on the Draft EIR with a copy of the City's response to those comments at least ten days before certifying the Final EIR. In addition, the City may also provide an opportunity for members of the public to review the Final EIR prior to certification, though this is not a requirement of the California Environmental Quality Act (CEQA).

## 8.3 USE OF THE FINAL EIR

The Final EIR allows the public and the City of Corona an opportunity to review the response to comments, revisions to the Draft EIR, and other components of the EIR, such as the Mitigation Monitoring Program (MMP), prior to the City's decision on the project. The Final EIR serves as the environmental document to support approval of the proposed project, either in whole or in part.

After completing the Final EIR, and before approving the project, the Lead Agency must first "certify" the Final EIR. As required by CEQA Guidelines Section 15090, certification consists of three distinct but complementary findings:

That the Final EIR has been completed in compliance with CEQA

That the Final EIR was presented to the decision-making body of the Lead Agency, and that the decision-making body reviewed and considered the information in the Final EIR prior to approving the project

That the Final EIR reflects the Lead Agency's independent judgment and analysis

This three-part certification, the Findings of Fact, and the Statement of Overriding Considerations (the latter two of which are described below) are included in a separate findings document. Both the Final EIR and the findings will be submitted to the City Council of the City of Corona for its consideration in connection with the proposed C-CAP.

CEQA "Findings of Fact" are adopted pursuant to CEQA Guidelines Section 15091(a), which provides that if an EIR that has been certified for a project identifies one or more significant environmental effects, the lead agency decision-making body must make one or more of the following findings with respect to each significant effect identified in the Final EIR:

1. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the EIR.
2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
3. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

Each finding must be accompanied by a brief explanation of the rationale for the finding, though references to supporting text in the EIR documentation is commonly used to satisfy that requirement. In addition, pursuant to CEQA Guidelines Section 15091(d), the agency must adopt, in conjunction with the findings, a program for reporting on or monitoring the changes that it has either required in the project or made a condition of approval to avoid or substantially lessen environmental effects. These measures must be fully enforceable through permit conditions, agreements, or other measures. This program is referred to as the Mitigation Monitoring Program.

Additionally, pursuant to CEQA Guidelines Sections 15091(b) and 15093(b), when a Lead Agency approves a project that would result in significant, unavoidable impacts that are disclosed in the Final EIR, the agency must state in writing its reasons for supporting the approved action. This Statement of Overriding Considerations must be supported by substantial information in the record, which includes this Final EIR. Since the proposed C-CAP could result in a few significant, unavoidable impacts as identified in this Final EIR, the City Council of the City of Corona would be required to adopt a Statement of Overriding Considerations if it approves the proposed project.

# CHAPTER 9 Changes to the Draft EIR

## 9.1 FORMAT OF TEXT CHANGES

Text changes are intended to clarify or correct information in the Draft EIR in response to comments received on the document, or as initiated by Lead Agency staff. Revisions are shown below as excerpts from the Draft EIR text, with a ~~line through~~ deleted text and a double underline beneath inserted text. In order to indicate the location in the Draft EIR where text has been changed, the reader is referred to the page number of the Draft EIR.

## 9.2 TEXT CHANGES

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**Page 2-4, Section 2.2 (Project Description), first partial paragraph**

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(Second paragraph of Page 4.3-20 in the DEIR)

R1-T3: Executive Order S-1-07: Low Carbon Fuel Standard

The Low Carbon Fuel Standard (LCFS) will require a reduction of at least 10 percent in the carbon intensity of California's transportation fuels by 2020. By 2020, this requirement will reduce emissions in California by approximately 15 MMT CO<sub>2</sub>e, representing 6.9 percent of emissions from passenger/light-duty vehicles in the state (California ARB 2008). The emissions reduced by this strategy overlap with emissions as a result of the Pavley legislation; adding the emissions reductions would be an overestimate of the actual emissions reductions. This is accounted for in the emission reduction calculations following the methodology used by California ARB to calculate emissions reductions in the AB 32 Scoping Plan. R1-T1 through R1-T3 are projected to reduce community-wide GHG emissions attributable to the Community served by the City of Corona by approximately 182,654 MT CO<sub>2</sub>e per year in 2020.

(Third paragraph of Page 4.3-20 in the DEIR)

R1-T4: Low Tire Pressure Program

The AB 32 early action measure involves actions to ensure that vehicle tire pressure is maintained to manufacturer specifications. The state's plan for implementing this measure is directed at automotive service providers. California ARB is requiring automotive service providers to check and inflate each vehicle's tires to the recommended tire pressure rating at the time of performing any automotive maintenance or repair service, indicate on the vehicle service invoice that a tire inflation service was completed and the tire pressure measurements after the services were performed, and keep a copy of the service invoice for a minimum of three years, and make the vehicle service invoice available to the ARB, or its authorized representative upon request. By 2020, California ARB estimates that this requirement will reduce emissions in California by approximately 0.55 MMT CO<sub>2</sub>e, representing 0.3 percent of emissions from passenger/light-duty vehicles in the state (California ARB 2008). R1-T4 is projected to reduce community-wide GHG emissions attributable to the Community served by the City of Corona by approximately 1,571 MT CO<sub>2</sub>e per year in 2020.

(Fourth paragraph of Page 4.3-20 in the DEIR)

R1-T5: Low Rolling Resistance Tires

This AB 32 early action measure would increase vehicle efficiency by creating an energy efficiency standard for automobile tires to reduce rolling resistance. By 2020, this requirement will reduce emissions in California by approximately 0.3 MMT CO<sub>2</sub>e, representing 0.2 percent of emissions from passenger/light-duty vehicles in the state (California ARB 2008). R1-T5 is projected to reduce community-wide GHG emissions attributable to the Community served by the City of Corona by approximately 1,566 MT CO<sub>2</sub>e per year in 2020.

(Last paragraph of Page 4.3-20 in the DEIR)

#### R1-T6: Low Friction Oils

This AB 32 early action measure would increase vehicle efficiency by mandating the use of engine oils that meet certain low friction specifications. By 2020, this requirement will reduce emissions in California by approximately 2.8 MMT CO<sub>2</sub>e, representing 1.7 percent of emissions from passenger light-duty vehicles in the state (California ARB 2008). R1-T6 is projected to reduce community-wide GHG emissions attributable to the Community served by the City of Corona by approximately 8,849 MT CO<sub>2</sub>e per year in 2020.

(First paragraph of Page 4.3-21 in the DEIR)

#### R1-T7: Goods Movement Efficiency Measure

This AB 32 early action measure targets system wide efficiency improvements in goods movement to achieve GHG reductions from reduced diesel combustion. By 2020, this requirement will reduce emissions in California by approximately 3.5 MMT CO<sub>2</sub>e, representing 1.6 Percent of emissions from all mobile sources (on-road and off-road) in the state (California ARB 2008). R1-T7 is projected to reduce community-wide GHG emissions attributable to the Community served by the City of Corona by approximately 6,897 MT CO<sub>2</sub>e per year in 2020.

(Second paragraph of Page 4.3-21 in the DEIR)

#### R1-T8: Heavy-Duty Vehicle GHG Emission Reduction (Aerodynamic Efficiency)

This AB 32 early action measure would increase heavy-duty vehicle (long-haul trucks) efficiency by requiring installation of best available technology and/or California ARB approved technology to reduce aerodynamic drag and rolling resistance. By 2020, this requirement will reduce emissions in California by approximately 0.93 MMT CO<sub>2</sub>e, representing 1.9 percent of emissions from heavy-duty vehicles in the state (California ARB 2008). R1-T8 is projected to reduce community-wide GHG emissions attributable to the Community served by the City of Corona by approximately 8,060 MT CO<sub>2</sub>e per year in 2020.

(Third paragraph of Page 4.3-21 in the DEIR)

#### R1-T9: Medium and Heavy-Duty Vehicle Hybridization

The implementation approach for this AB 32 measure is to adopt a regulation and/or incentive program that reduces the GHG emissions of new trucks (parcel delivery trucks and vans, utility trucks, garbage trucks, transit buses, and other vocational work trucks) sold in California by replacing them with hybrids. By 2020, this requirement will reduce emissions in California by approximately 0.5 MMT CO<sub>2</sub>e, representing 0.2 percent of emissions from all on-road mobile sources in the state. This reduction is also equivalent to a 1.0 percent reduction of emissions from all heavy-duty trucks in the state (California ARB 2008). R1-T9 is projected to reduce community-wide GHG emissions attributable to the Community served by the City of Corona by approximately 832 MT CO<sub>2</sub>e per year in 2020.

(Fifth and sixth paragraphs of Page 4.3-21 in the DEIR)

#### R2-T1: Land Use Based trips and VMT Reduction Policies

This measure complements the City's existing Transportation Demand Management (TDM) program to achieve greater vehicle trip and VMT reductions.

The demand for transportation is influenced by the density and geographic distribution of people and places. Whether neighborhoods have sidewalks or bike paths, whether homes are within walking distance

of shops or transit stops will influence the type and amount of transportation that is utilized. By changing the focus of land use from automobile centered transportation, a reduction in vehicle miles traveled will occur. Opportunities include a 0.5-mile radius around the Metrolink Station, mixed use development within the growth areas of the City, and infill development within downtown Corona. See Appendix E for detailed emissions reduction calculations for this strategy and all of the reduction strategies. R2-T1 is projected to reduce community-wide GHG emissions attributable to the Community served by the City of Corona by approximately 20,468 MT CO<sub>2</sub>e per year in 2020.

(Last paragraph of Page 4.3-21 and continuing into the first paragraph of Page 4.3-22 in the DEIR)

#### R2-T2: Residential Permit Parking

“Residential Permit Parking is an existing City program that allows residents of qualified neighborhoods to obtain special permits that exempt them and their guests from certain on-street parking time limits or prohibitions in their areas. Anticipated reductions from this measure come from the future qualified neighborhoods that will become part of the program. . .” R2-T2 is projected to reduce community-wide GHG emissions attributable to the Community served by the City of Corona by approximately 491 MT CO<sub>2</sub>e per year in 2020.

(Second paragraph of Page 4.3-22 in the DEIR)

#### R2-T3: Bicycle Master Plan

Corona’s Bicycle Master Plan is extensive and describes the construction on 11.5 miles of Class I bike paths and 23 miles of Class II and Class III bikeways to build upon the current 8 miles of bikeways (Corona 2001). The reduction associated with bicycle infrastructure was calculated following CAPCOA’s methodology and are based on the increased miles of bike paths and bikeways. R2-T3 is projected to reduce community-wide GHG emissions attributable to the Community served by the City of Corona by approximately 12,661 MT CO<sub>2</sub>e per year in 2020.

(Third paragraph of Page 4.3-22 in the DEIR)

#### R2-T4: WRCOG Neighborhood Electric Vehicle Plan

Implementation of the WRCOG’s Neighborhood Electric Vehicle (NEV) Plan has the potential to decrease VMT from traditional passenger vehicles by encouraging the replacements of trips in passenger vehicles with trips in electric vehicles (WRCOG 2010). A conservative estimate for adoption of NEVs by residents is 4 percent. Each household with an NEV replaces, on average, 12.7 percent of traditional passenger vehicle trips with electric vehicle trips (CAPCOA 2010). This equates to a 0.5 percent reduction in VMT community-wide. R2-T4 is projected to reduce community-wide GHG emissions attributable to the Community served by the City of Corona by approximately 2,438 MT CO<sub>2</sub>e per year in 2020.

(Third paragraph of Page 4.3-23 in the DEIR)

#### R1-E1: Renewable Portfolio Standard for Building Energy Use

Senate Bills (SBs) 1075 (2002) and 107 (2006) created the state’s Renewable Portfolio Standard (RPS), with an initial goal of 20 percent renewable energy production by 2010. Executive Order (EO) S-14-08 establishes a RPS target of 33 percent by the year 2020 and requires state agencies to take all appropriate actions to ensure the target is met. In April 2011, Governor Jerry Brown signed Senate Bill 2 (2011), which codified the Executive Order and requires the State to reach the 2020 goal (California ARB 2008). R1-E1 is projected to reduce community-wide GHG emissions attributable to the Community served by the City of Corona by approximately 74,800 MT CO<sub>2</sub>e per year in 2020.

(Fourth paragraph of Page 4.3-23 in the DEIR)

#### R1-E2 and R1-E3: AB 1109 Energy Efficiency Standards for Lighting (Residential and Commercial Indoor and Outdoor Lighting)

Assembly Bill (AB 1109) mandated that the California Energy Commission (CEC) on or before December 31, 2008, adopt energy efficiency standards for general purpose lighting. These regulations,

combined with other state efforts, shall be structured to reduce statewide electricity consumption in the following ways:

- R1-E2: At least 50 percent reduction from 2007 levels for indoor residential lighting by 2018
- R1-E3: At least 25 percent reduction from 2007 levels for indoor commercial and outdoor lighting by 2018 (California ARB 2008)

R1-E2 is projected to reduce community-wide GHG emissions attributable to the Community served by the City of Corona by approximately 1,043 MT CO<sub>2</sub>e per year, and R1-E3 is projected to reduce approximately 6,084 MT CO<sub>2</sub>e per year in 2020.

(Last two paragraphs of Page 4.3-23 and continuing into the first paragraph of Page 4.3-24 in the DEIR)  
R1-E4: Electric Energy Efficiency (AB 32)

“This measure captures the emission reductions associated with electricity energy efficiency activities included in California ARB’s AB 32 Scoping Plan that are not attributed to other R1 or R2 reductions, as described in this report. This measure includes energy efficiency measures that California ARB views as crucial to meeting the statewide 2020 target, and will result in additional emissions reductions beyond those already accounted for in California’s Energy Efficiency Standards for Residential and Non-Residential Buildings (Title 24, Part 6 of the California Code of Regulations; hereinafter referred to as, “Title 24 Energy Efficiency Standards”) of California’s Green Building Standards Code (Title 24, Part 11 of the California Code of Regulations; hereinafter referred to as “CALGreen”). . . .” R1-E4 is projected to reduce community-wide GHG emissions attributable to the Community served by the City of Corona by approximately 7,182 MT CO<sub>2</sub>e per year in 2020.

(Second paragraph of Page 4.3-24 in the DEIR)

R1-E5: Natural Gas Efficiency (AB 32)

“This measure captures the emission reductions associated with natural gas energy efficiency activities included in California ARB’s AB 32 Scoping Plan that are not attributed to other R1 or R2 reductions, as described in this report. This measure includes energy efficiency measures that California ARB views as crucial to meeting the statewide 2020 target, and will result in additional emissions reductions beyond those already accounted for in the Title 24 Energy Efficiency Standards or CALGreen. By 2020, this requirement will reduce emissions in California by approximately 4.3 MMT CO<sub>2</sub>e, representing 6.2 percent of emissions from all natural gas combustion in the state (California ARB 2008). . . .” R1-E5 is projected to reduce community-wide GHG emissions attributable to the Community served by the City of Corona by approximately 4,291 MT CO<sub>2</sub>e per year in 2020.

(Last paragraph of Page 4.3-24 and continuing into the first paragraph of Page 4.3-25 in the DEIR)

R1-E6: Increased Combined Heat and Power (AB 32)

This measure captures the reduction in building electricity emissions associated with the increase of combined heat and power activities, as outlined in California ARB’s AB 32 Scoping Plan. The Scoping Plan suggests that increased combined heat and power systems, which capture “waste heat” produced during power generation for local use, will offset 30,000 GWh statewide in 2020. Approaches to lowering market barriers include utility-provided incentive payments, a possible CHP portfolio standard, transmission and distribution support systems, or the use of feed-in tariffs. By 2020, this requirement will reduce emissions in California by approximately 6.7 MMT CO<sub>2</sub>e, representing 7.6 percent of emissions from all electricity in the state (California ARB 2008). R1-E6 is projected to reduce community-wide GHG emissions attributable to the Community served by the City of Corona by approximately 21,393 MT CO<sub>2</sub>e per year in 2020.

(Second paragraph of Page 4.3-25 in the DEIR)

R1-E7: Industrial Efficiency Measures (AB 32)

This measure captures the reduction in industrial building energy emissions associated with the energy efficiency measures for industrial sources included in California ARB's AB 32 Scoping Plan. By 2020, this requirement will reduce emissions in California by approximately 1.0 MMT CO<sub>2</sub>e, representing 3.9 percent of emissions from all industrial natural gas combustion in the state (California ARB 2008). California ARB proposes the following possible statewide measures:

- Oil and gas extraction regulations and programs to reduce fugitive CH<sub>4</sub> emissions
- GHG leak reduction from oil and gas transmission
- Refinery flare recovery process improvements
- Removal of methane exemption from existing refinery regulations

R1-E7 is projected to reduce community-wide GHG emissions attributable to the Community served by the City of Corona by approximately 10,144 MT CO<sub>2</sub>e per year in 2020.

(Fourth through sixth paragraphs of Page 4.3-25, and continuing into the first paragraph of Page 4.3-26 in the DEIR)

R2-E1: New Construction Residential Energy Efficiency Requirements

“This measure facilitates the implementation of energy efficient design for all new residential buildings to be 20 percent beyond the current Title 24 Standards. This energy efficiency requirement is equal to that of the LEED for Homes and ENERGY STAR programs. . . .” R2-E1 is projected to reduce community-wide GHG emissions attributable to the Community served by the City of Corona by approximately 2,338 MT CO<sub>2</sub>e per year in 2020.

(Second and third paragraphs of Page 4.3-26 in the DEIR)

R2-E2: New Construction Residential Renewable Energy

“This measure facilitates the voluntary incorporation of renewable energy (such as photovoltaic panels) into new residential developments. For participating developments, renewable energy application should be such that the new home's projected energy use from the grid is reduced by 50 percent. The California Energy Commissions' New Solar Homes Partnership is a component of the California Solar Initiative and provides rebates to developers of 6 or more units where 50 percent of the units include solar power.. . .” R2-E2 is projected to reduce community-wide GHG emissions attributable to the Community served by the City of Corona by approximately 1,043 MT CO<sub>2</sub>e per year in 2020.

(Last paragraph of Page 4.3-26, and continuing into the first paragraph of Page 4.3-27 in the DEIR)

R2-E3: Residential Energy Efficiency Retrofits

“This reduction measure sets a goal for the City to increase energy efficiency in existing homes. The reductions calculated assume that 20 percent of home will participate and each home will be able to reduce energy consumption by 15 percent. There are a variety of financial incentives and programs to assist homeowners that make the implementation of these goals feasible. . . .” R2-E3 is projected to reduce community-wide GHG emissions attributable to the Community served by the City of Corona by approximately 6,084 MT CO<sub>2</sub>e per year in 2020.

(Second paragraph of Page 4.3-27 in the DEIR)

R2-E4: Residential Renewable Energy Retrofits

This measure sets a goal for City residents to retrofit their homes with photovoltaic panels such that 50 percent of all of the home's electrical usage is from renewable energy. The emissions reductions calculated for this measure assume that 20 percent of existing home will participate. The 20 percent

participation depends on the financial incentives and programs described in Chapter 7: Implementation of this report. In particular, the California Energy Commission's Solar Initiative has incentives available to home owners. In addition, WRCOG's Energy Efficiency and Water Conservation Program helps finance solar photovoltaic systems for residents. As with R2-E3, developers will be able to earn points in the screening table by contributing to renewable energy retrofits for existing homes. R2-E4 is projected to reduce community-wide GHG emissions attributable to the Community served by the City of Corona by approximately 7,181 MT CO<sub>2</sub>e per year in 2020.

(Third and fourth paragraphs of Page 4.3-27, and continuing into the first paragraph of Page 4.3-28 in the DEIR)

R2-E5: New Construction Commercial Energy Efficiency Requirements

"This measure facilitates the implementation of energy efficient design for all new commercial buildings to be 20 percent beyond the current Title 24 Standards. This energy efficiency requirement is 10 percent greater than the minimum requirements of the LEED and ENERGY STAR programs. As energy efficiency standards increase the City may want to periodically re-evaluate their percentage beyond Title 24 goal to ensure it is still a feasibly achievable goal. . . ." R2-E5 is projected to reduce community-wide GHG emissions attributable to the Community served by the City of Corona by approximately 16,834 MT CO<sub>2</sub>e per year in 2020.

(Second and third paragraphs of Page 4.3-28 in the DEIR)

R2-E6: New Construction Commercial Energy Efficiency Requirements

"This measure would facilitate the voluntary incorporation of renewable (solar or other renewable) energy generation into the design and construction of new commercial, office, and industrial developments. Renewable energy generation shall be incorporated such that a minimum of 20 percent of the project's total energy needs are offset. In addition this measure would encourage all facilities be equipped with "solar ready" features where feasible, to facilitate future installation of solar energy systems. These features should include the proper solar orientation (south facing roof sloped at 20° to 55° from the horizontal), clear access on south sloped roofs, electrical conduit installed for solar electric system wiring, plumbing installed for solar hot water systems, and space provided for a solar hot water tank. . . ." R2-E6 is projected to reduce community-wide GHG emissions attributable to the Community served by the City of Corona by approximately 1,438 MT CO<sub>2</sub>e per year in 2020.

(Last paragraph of Page 4.3-28 in the DEIR)

R2-E7: Commercial/Industrial Energy Efficiency and Renewable Energy Retrofits

"This measure sets a goal for all commercial or industrial buildings undergoing major renovations to reduce their energy consumption by a minimum of 20 percent. The emissions calculations assume that by 2020, 25 percent of commercial or industrial buildings will have reduced their energy consumption by 20 percent through energy efficiency and renewable energy retrofits. The State offers incentives and programs that contribute toward the implementation of this goal. Similar to the residential goals described above, WRCOG's Energy Efficiency and Water Conservation Program could help finance energy efficiency and renewable energy projects for commercial buildings. New developers can also earn points in the screening table document by contributing to energy efficiency or renewable energy projects for existing commercial buildings. . . ." R2-E7 is projected to reduce community-wide GHG emissions attributable to the Community served by the City of Corona by approximately 15,050 MT CO<sub>2</sub>e per year in 2020.

(First paragraph of Page 4.3-29 in the DEIR)

R2-E8: Induction Street Light Retrofits

Corona Department of Public Works maintains 12,265 street and safety lights city-wide. With the aid of the Energy Efficiency and Conservation Block Grant (EECBG) funds, the City will replace approximately 16 percent or 1,920 of the existing standard High Pressure Sodium (HPS) lamps with Induction Lighting. The new lamps are estimated to last 5 times longer and consume 50 percent less energy than the HPS lamps. R2-E8 is projected to reduce GHG emissions attributable to City operations by approximately 204 MT CO<sub>2</sub>e per year in 2020.

(Second paragraph of Page 4.3-29 in the DEIR)

R2-E9: Solar Power for Water Reclamation Facility #1

In addition to the induction streetlight retrofits, the City plans to utilize funds from the EECBG to increase the number of solar panels at their Water Reclamation Facility #1. The City Department of Water and Power (DWP) is investing \$1 million into the project which will be combined with the \$727,100 from EECBG. This will help reduce the energy load of the facility by an estimated 572,000 kWh annually. R2-E9 is projected to reduce GHG emissions attributable to City operations by approximately 174 MT CO<sub>2</sub>e per year in 2020.

(Third paragraph of Page 4.3-29 in the DEIR)

R2-E10: Solar Power for Water Reclamation Facility #1

“... The City’s current list of municipal project will achieve approximately 6,906,447 annual kWh savings. This is 84 percent of their C-CAP goals towards municipal energy savings. City staff will continue to work with the Community Energy Partnership to identify and implement additional energy saving retrofit projects over the coming years.” R2-E10 is projected to reduce GHG emissions attributable to City operations by approximately 2,101 MT CO<sub>2</sub>e per year in 2020.

(First paragraph of Page 4.3-31 in the DEIR)

R1-L1: Solar Power for Water Reclamation Facility #1

SCAQMD’s Rule 445 (Wood Burning Devices), adopted on March 7, 2008, applies to residents in the South Coast Air Basin and includes the following key components:

- No permanently installed indoor or outdoor wood burning devices in new developments
- Establishes a mandatory wood burning curtailment program on high pollution days during November through February, beginning November 1, 2011. Based on current air quality conditions, there may be 10 to 25 mandatory curtailment days in specific areas (SCAQMD 2008).

R1-L1 is projected to reduce community-wide GHG emissions attributable to the community the City of Corona Serves by approximately 4,490 MT CO<sub>2</sub>e per year in 2020.

(Second paragraph of Page 4.3-32 in the DEIR)

R1-W1: Renewable Portfolio Standard (33 percent by 2020) Related to Water Supply and Conveyance

This measure would increase electricity production from eligible renewable power sources to 33 percent by 2020. A reduction in GHG emissions results from replacing natural gas-fired electricity production with zero GHG-emitting renewable sources of power. By 2020, this requirement will reduce emissions from electricity used for water supply and conveyance in California by approximately 21.3 MMT CO<sub>2</sub>e, representing 15.2 percent of emissions from electricity generation (in-state and imports) (California ARB 2008). R1-W1 is projected to reduce community-wide GHG emissions attributable to the community the City of Corona serves by approximately 4,157 MT CO<sub>2</sub>e per year in 2020.

(Third through last paragraphs of Page 4.3-32, and continuing into the first three paragraphs of Page 4.3-33 in the DEIR)

R1-W1: Water Use Reduction Incentive

“This initiative would reduce emissions associated with electricity consumption for water treatment and conveyance. This measure encourages the City to adopt a per capita water use reduction goal in support of the Governors Executive Order S-14-08 which mandates the reduction of water use of 20 percent per capita. The City’s adoption of a water use reduction goal would introduce requirements for new development and would provide cooperative support for water purveyors that are required to implement these reductions for existing developments. The City would also provide internal reduction measures such that City facilities will support this reduction requirement. . . .” R2-W1 is projected to reduce community-wide GHG emissions attributable to the community the City of Corona serves by approximately 3,596 MT CO<sub>2</sub>e per year in 2020.

(Last paragraph of Page 4.3-33 and continuing into the first paragraph of Page 4.3-34 in the DEIR)

#### R1-S1: Solid Waste Measure

The California ARB AB 32 Scoping Plan recommends three measures for reducing emissions from Municipal Solid Waste at the state level, including (1) landfill methane control, (2) increase the efficiency of landfill methane capture, and (3) high recycling/zero waste. California ARB approved a regulation implementing the discrete early action program for methane recovery (1), which became effective June 17, 2010. This measure is expected to result in a 1.0 MMT CO<sub>2</sub>e reduction by 2020 (California ARB 2008). Other measures proposed by California ARB include increasing efficiency of landfill methane capture (2) and instituting high recycling/zero waste policies (3). Potential reductions associated with these measures are still to be determined. The projected reductions associated with R1-S1 were not calculated separately, but combined with the City’s waste diversion program (R2-S1) and total reductions for both measures are shown under R2-S1

(Third paragraph of Page 4.3-34 in the DEIR)

#### R2-S1: City Diversion Program

“This measure would implement a City wide waste diversion goal of diverting 75 percent (current diversion rate is 58 percent) of all waste from landfills by 2020. The following is a potential list of waste reduction measures that will further strengthen existing waste reduction/diversion programs along with coordination with Waste Management and El Sobrante Landfill. . . .” R1-S1 and R2-S1 are projected to reduce community-wide GHG emissions attributable to the community the City of Corona serves by approximately 11,712 MT CO<sub>2</sub>e per year in 2020.

(Third paragraph of Page 4.3-34 in the DEIR)

#### R2-S1: City Diversion Program

“This measure would implement a City wide waste diversion goal of diverting 75 percent (current diversion rate is 58 percent) of all waste from landfills by 2020. The following is a potential list of waste reduction measures that will further strengthen existing waste reduction/diversion programs along with coordination with Waste Management and El Sobrante Landfill. . . .” R1-S1 and R2-S1 are projected to reduce community-wide GHG emissions attributable to the community the City of Corona serves by approximately 11,712 MT CO<sub>2</sub>e per year in 2020.

# CHAPTER 10 Comments and Responses

## 10.1 ORGANIZATION OF THE RESPONSES TO COMMENTS

One comment letter regarding the City of Corona Climate Action Plan (C-CAP) Draft EIR was received from the South Coast Air Quality Management District (SCAQMD) dated April 11, 2012.

This chapter of the Final EIR contains the SCAQMD comments received on the Draft EIR during the public review period, as well as the Lead Agency's responses to these comments. Reasoned, factual responses have been provided to all comments received, with a particular emphasis on significant environmental issues. Detailed responses have been provided where a comment raises a specific issue; however, a general response has been provided where the comment is relatively general. Although some comments may raise legal or planning issues, these issues do not always constitute significant environmental issues, and thus, from a purely legal standpoint, do not require a response under CEQA (refer to Public Resources Code § 21091, subd. (d)(2)(B); CEQA Guidelines § 15088, subd. (c)). Even so, the City, in the interest of full disclosure and informed public participation, has tried to respond to each point raised by the commenter. Brief responses to the issues have been provided that focus on relevant sections of the proposed C-CAP. Generally, the responses to comments provide explanation or amplification of information contained in the Draft EIR.

## 10.2 COMMENTS ON THE DRAFT EIR AND RESPONSES

This section contains the original comment letter, which has been bracketed to identify the individual comments, followed by the responses to the comments of the letter. As noted above, and stated in CEQA Guidelines Sections 15088(a) and (b), all comments that raise significant environmental issues are provided with responses to the environmental issues, as are many additional points that, strictly speaking, do not require responses under CEQA. Comments that are outside of the scope of CEQA review are noted and provided with a brief response focusing on relevant sections of the Draft C-CAP. All comments, including comments that express opinions for or against the Draft C-CAP (or somewhere in between), will be forwarded for consideration to the decision-makers as part of the Final EIR during the project approval process.

## ■ Comment Letter: South Coast Air Quality Management District (SCAQMD) April 11, 2012

	<p><b>South Coast Air Quality Management District</b> 21865 Copley Drive, Diamond Bar, CA 91765-4182 (909) 396-2000 • www.aqmd.gov</p>	<p><b>SCAQMD</b></p>
<p><u>E-Mailed: April 11, 2012</u> terrim@ci.corona.ca.us</p>		<p>April 11, 2012</p>
<p>Ms. Terri Manuel Community Development Department City of Corona 400 South Vicentia Avenue Corona, CA 92882-2187</p>		
<p><b><u>Review of the Draft Environmental Impact Report (Draft EIR) for the City of Corona Climate Action Plan Project</u></b></p>		
<p>The South Coast Air Quality Management District (AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comment is intended to provide guidance to the lead agency and should be incorporated into the Final Environmental Impact Report (Final EIR) as appropriate.</p>		
<p>Based on a review of the Draft EIR the AQMD staff recognizes the potential regional air quality and greenhouse gas (GHG) emissions benefits from the proposed project that encourages mixed land uses and alternative modes of transportation in the project area. However, AQMD staff requests that the lead agency further clarify how the policies for the proposed Corona Climate Action Plan (C-CAP) reduce GHG emissions consistent with the California Air Resources Board (CARB) Climate Change Scoping Plan<sup>1</sup> and provide additional technical data that demonstrates how the transportation measures in the C-CAP will be implemented. Details regarding these comments are attached to this letter.</p>		
<p>Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the lead agency to address these issues and any other questions that</p>		
<p><sup>1</sup> The California Air Resources Board AB 32 Climate Change Scoping Plan document. Accessed at: <a href="http://www.arb.ca.gov/cc/scopingplan/document/scopingplandocument.htm">http://www.arb.ca.gov/cc/scopingplan/document/scopingplandocument.htm</a></p>		

SCAQMD-1

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may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

↑ SCAQMD-1  
Cont.

Sincerely,



Ian MacMillan  
Program Supervisor, CEQA Inter-Governmental Review  
Planning, Rule Development & Area Sources

Attachment

IM:DG

RVC120228-04  
Control Number

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### Greenhouse Gas Emissions Analysis and Reduction Target

1. Based on a review of the Draft EIR the lead agency has determined that the proposed project will achieve its GHG reduction target of 15% below 2008 levels by 2020. However, the AQMD staff requests further clarification about how the project is consistent with statewide AB 32 goals. Specifically, the baseline year used for the proposed project is 2008 GHG emissions levels whereas the baseline year used in the CARB Scoping Plan is 2005. The AB 32 Scoping Plan proposed a 15% reduction below 2005 emissions to achieve 1990 levels by 2020. If the city's 2008 emissions levels are greater than 2005 levels then the project's proposed 15% reduction may not be sufficient to achieve 1990 levels by 2020.

SCAQMD-2

Further, last year (August 2011) the CARB approved the Final Supplement<sup>2</sup> to the AB32 Scoping Plan that provided an updated business-as-usual (BAU) analysis. The updated analysis is based on a three year average between 2006 and 2008 and considers the influence of the recent recession and emission reduction measures that had been implemented since 2005. The result of the analysis indicates that a 16% GHG emissions reduction from base year (average of 2006-2008) levels is required to meet the AB 32 goals. Therefore, the AQMD staff requests that the lead agency clarify that a 15% GHG emissions reduction from 2008 levels is consistent with statewide initiatives.

### Effectiveness of C-CAP Measures

2. The lead agency determines that the R (i.e., R1-R3) measures in the C-CAP will reduce GHG emissions; however, the lead agency does not present the effectiveness of each measure in emissions units. Instead the lead agency presents the effectiveness of each measure in varying units using a percentage (e.g., percent of VMT and percent of energy use); as a result, it is difficult to determine emissions reductions associated with each measure. For example, a significant portion of the project's GHG emissions impacts are from mobile source emissions (i.e., approximately 48%) related to the substantial increase of vehicle mile traveled (VMT) in the project area. Therefore, the lead agency addresses this increase in mobile source emissions with aggressive measures such as Measure R2-T1 and R2-T2 of the C-CAP that increases transportation demand and reduces VMT garnering over a four percent reduction in VMT. However, the lead agency does not provide detailed calculations that demonstrate how these measures can achieve a four percent reduction in VMT thereby substantially reducing GHG emissions. The detailed calculation should include the VMT assumptions and metrics used to determine the effectiveness of these measures. Given the lack of explicit information in the Draft EIR that ties the effectiveness of the R measures in Appendix E of the C-CAP to the project's GHG emissions reductions the AQMD staff recommends that the lead agency provide additional data and detailed calculations in the Final EIR that disclose how the assumed emissions reductions for each R measure can be achieved.

SCAQMD-3

<sup>2</sup> The Final Supplement to the California Air Resources Board AB 32 Climate Change Scoping Plan document can be accessed at: [http://www.arb.ca.gov/cc/scopingplan/document/final\\_supplement\\_to\\_sp\\_fed.pdf](http://www.arb.ca.gov/cc/scopingplan/document/final_supplement_to_sp_fed.pdf)

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Inconsistent Data

3. Upon review of the appendices in the C-CAP the AQMD staff noticed that the reported values for many emissions source categories (input values) and emissions inventories are inconsistent with the reported values in the Draft EIR. For example, the stated electricity emissions factors are from 2005 whereas the Draft EIR indicates that a 2008 emissions inventory was used to calculate GHG emissions. Also, the GHG emissions inventory values in Appendix D of the C-CAP are inconsistent with the values reported in Tables 4.3-2 through Tables 4.3-5 of the Draft EIR. Therefore, the AQMD staff recommends that the lead agency review the C-CAP and Draft EIR to ensure that the values used to calculate the project’s GHG emissions impacts are consistent and that the measures associated with these values remain sufficient to achieve the GHG emissions reduction targets.

SCAQMD-4

Consistency with CalEEMod and CAPCOA

4. Given that the proposed plan is anticipated to be widely used by projects within the City of Corona and will require the use of common land use planning and emissions estimating tools the AQMD staff requests that the lead agency review Appendix B and Appendix C of the C-CAP and consider updating the data assumptions and input values to maintain consistency with those in CalEEMod<sup>3</sup> and the CAPCOA guidance document for quantifying GHG mitigation measures<sup>4</sup>.

SCAQMD-5

<sup>3</sup> <http://www.caleemod.com/>

<sup>4</sup> <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

## ■ Responses to Comment Letter from South Coast Air Quality Management District (SCAQMD) April 11, 2012

### **Response to Comment SCAQMD-1**

This comment is the entirety of the two-page cover letter that provides introductory material and summarizes the comments in the detailed attachment, which are comments SCAQMD-2 through SCAQMD-5, to which specific responses are provided, below.

### **Response to Comment SCAQMD-2**

The analysis conducted by the California Air Resources Board (ARB) in the Final Supplement to the AB 32 Scoping Plan (August 2011) referenced by SCAQMD determined that greenhouse gas (GHG) emissions in California need to be reduced by 16 percent from business as usual (BAU) forecasts for 2020 in order to achieve the Reduction Target of returning to 1990 levels of emissions by 2020 (Final Supplement to the AB 32 Scoping Plan, Table 1.2-2, page 11). The Final Supplement to the AB 32 Scoping Plan did not change the AB 32 goal of reducing GHG emissions within California to 1990 levels of emissions by 2020.

The analysis cited by SCAQMD shows the changes that have occurred in forecasting 2020 BAU between the AB 32 Scoping Plan adopted in January of 2009, which predicted the need to reduce 2020 BAU by approximately 29 percent, and the Final Supplement to the AB 32 Scoping Plan of August 2011, which predicts the need to reduce 2020 BAU by 16 percent. One reason for changing the forecast is that technology and regulations have changed since the original AB 32 Scoping Plan was written (2007/08) and adopted (2009). The technology and regulations taken into account in the Final Supplement that are reducing GHG emissions within the State will continue to occur into year 2020 and is now part of the 2020 BAU scenario in the Final Supplement to the AB 32 Scoping Plan. The other major reason for a drop in the forecasted 2020 BAU is the change in growth rates within the State demonstrated in the 2010 Census. The 2010 census data reflects the economic and social impacts of the “Great Recession” and how it has changed both economic and population growth patterns. The Final Supplement does not change the recommendation by ARB in the AB 32 Scoping plan that local jurisdictions adopt a reduction target of 15 percent below existing conditions by year 2020 in order to assist the State in reducing GHG emissions and achieving the goals of AB 32. The City of Corona has not set a reduction target based on forecasted 2020 BAU levels of emissions. The Reduction Target in the City of Corona Climate Action Plan (C-CAP) is to reduce emissions 15 percent below baseline GHG emissions by 2020. This is a reduction of current GHG emission levels, not a reduction from forecasted 2020 BAU. There are two main reasons the Reduction Target in the C-CAP is appropriate:

1. Setting a reduction target based upon a forecasted BAU is not as accurate as basing the reduction target on known levels of emissions. The City of Corona has established the Reduction Target based on known baseline levels of emissions, which is more accurate.
2. The City of Corona followed the ARB recommendation of setting a reduction target of 15 percent below current levels of emissions by 2020 in order to assist the State in meeting the AB 32 goals. The Final Supplement to the AB 32 Scoping Plan has not changed that ARB recommendation.

### **Response to Comment SCAQMD-3**

In response to the comment, text changes as outlined in Chapter 9 of the Final EIR have been made to further quantify the reduction measures in emission units when possible. Note that many of the transportation-related reduction measures do not have discrete emission unit efficiencies because the transportation-related reductions are based on using a combination of measures to reduce vehicle miles traveled (VMT) and associated emissions. As an example, providing transit alone does not significantly reduce transportation-related emissions. However, combining transit with transit-oriented development (TOD) in close proximity to transit stations combined with parking restrictions in an area served by transit and a robust network of pedestrian and bicycle paths linking transit stations to logical destinations all result in a significant reduction of VMT that cannot be achieved by any one of these reduction measures alone. In addition, the traffic model used by the City of Corona predicts total VMT based upon all of the variables affecting trip generation and trip length. Adding to the complexity is calculating emission reductions associated with the low carbon fuel standard or vehicle efficiency standards. Other measures, such as energy efficiency and renewable energy, can be easily segregated into emission units. Therefore, the text changes better quantify the reductions in emission units to the extent possible. In cases like VMT reductions, the City must still quantify the combined reductions predicted by the traffic model to provide more details.

### **Response to Comment SCAQMD-4**

The City has reviewed the C-CAP with the Draft EIR description of emissions for consistency and accuracy. In calculating the C-CAP baseline inventory the 2005 emission factors for Southern California Edison (SCE) was used in converting energy consumption into GHG emissions for the 2008 baseline inventory. The Draft EIR is also correct in stating that a 2008 baseline inventory was used in the C-CAP. The following provides clarification as to how the 2008 inventory was calculated.

In comparing the tables in Appendix D of the C-CAP, with the tables in the body of the C-CAP and the Draft EIR the following will help clarify how they relate:

Draft EIR Table 4.3-2 corresponds to C-CAP Table 3-1, and the C-CAP Appendix D page 1 2008 inventory

Draft EIR Table 4.3-3 corresponds to C-CAP Table 3-4, and the C-CAP Appendix D page 1 2020 BAU

Draft EIR Table 4.3-5 corresponds to C-CAP Table 5-1, and the C-CAP Appendix D page 1 2020 Reduced

Table 4.3-4 is unique to the Draft EIR in that it compares passenger car emissions within the 2020 reduced emissions inventory with the Regional Reduction Target for the Southern California Association of Governments (SCAG) mandated by SB 375. This table was a quantitative way of reviewing consistency of the C-CAP with SCAG's Draft Sustainable Communities Strategy (SCS) by using the SCAG Regional Reduction Target for 2020. Specifically, the SCAG 2020 Regional Reduction Target is 3.07 metric tonnes of carbon dioxide equivalent per capita (MT CO<sub>2</sub>e/capita) for passenger cars and light duty trucks. Corona through implementation of the C-CAP will achieve 3.05 MT CO<sub>2</sub>e/capita in 2020, which exceeds the SCAG 2020 Regional Reduction Target. Through this analysis in the Draft EIR, the

C-CAP was determined to be consistent with SCAG's efforts at reducing GHG emissions related to passenger cars and light duty trucks through implementation of the Draft SCS.

### **Response to Comment SCAQMD-5**

The inventories and reductions in the C-CAP use the baseline inventory as a foundation in forecasting future emissions and reductions. This includes utility data for actual energy and water consumption rates, waste and wastewater generation rates, and traffic counts. The quantified inventories in the C-CAP are more accurate than using the CalEEMod to predict a set of inventories. The reduction quantification does take into account the California Air Pollution Controls Officers Association (CAPCOA) reduction equations in reducing emissions, but uses actual energy and water consumption rates, waste and wastewater generation rates for the City of Corona rather than the default assumptions for these variables in the equations. By contrast, the development review process needs to show consistency with the CalEEMod and CAPCOA reductions, because the development review process includes an analysis of GHG emissions or use of the Screening Tables in demonstrating consistency of the development project with the C-CAP. Therefore, the City will include the use of the CalEEMod and CAPCOA GHG Mitigation document in the development review process for future development projects under the C-CAP. Further, the City will work with SCAQMD staff to ensure that the Screening Tables are fundamentally consistent with the reductions anticipated by the CalEEMod and the CAPCOA GHG mitigation measure quantification.

# CHAPTER 11 Mitigation Monitoring Program

## 11.1 INTRODUCTION

The California Environmental Quality Act (CEQA) requires the adoption of feasible mitigation measures to reduce the severity and magnitude of potentially significant environmental impacts associated with project development. The Final Environmental Impact Report (Final EIR) for the City of Corona Climate Action Plan (C-CAP) project includes mitigation measures to reduce the potential environmental effects of the proposed project.

Monitoring of the implementation of adopted mitigation measures is required by Public Resources Code § 21081.6(a)(1) and CEQA Guidelines Section 15097. The Final EIR for the proposed project provides a list of program-level mitigation measures that would be implemented by all subsequent development under the C-CAP, and describes the process whereby the mitigation measures would be monitored. Following certification of the Final EIR and approval of this Mitigation Monitoring Program (MMP) by the City of Corona, the mitigation measures included in the Final EIR would be monitored in the manner specified by the MMP.

## 11.2 PURPOSE

The purpose of the proposed C-CAP Final EIR MMP is to ensure compliance with all mitigation measures designed to mitigate or avoid potentially significant adverse environmental impacts resulting from the proposed project, which were identified in the Final EIR. The implementation of this MMP shall be accomplished by the City of Corona, consultants, and appropriate agencies.

## 11.3 RESPONSIBILITIES AND DUTIES

The City of Corona Planning Manager will be responsible for ensuring that mitigation measures are implemented within a timely manner of certification of the Final EIR and approval of the proposed C-CAP.

In general, monitoring will consist of demonstrating that mitigation measures were implemented, and that the responsible units monitored the implementation of the measures. Monitoring will consist of determining whether the following occurs:

- Certain actions occurred within a timely manner of project approval

- The required measures were acknowledged and implemented during implementation of the plan

## 11.4 MITIGATION MONITORING PROGRAM MATRIX

All project mitigation measures included in the Final EIR would be monitored in conjunction with the MMP for the proposed C-CAP. Table 11-1 (Mitigation Monitoring Program for the C-CAP Final EIR) is the Mitigation Monitoring Program for the proposed C-CAP.

**Table 11-1 Mitigation Monitoring Program for the C-CAP Final EIR**

Mitigation Measure	Action Required	Monitoring Phase	Responsible Agency/ Party	Compliance Verification	
				Initial	Date
<b>MM4.1-1(a)</b> Renewable energy generating facilities shall be placed or constructed below any major ridgeline when viewed from any designated scenic corridor as identified in the City of Corona General Plan.	Review design and site plans	During plan check	Planning Division		
<b>MM4.1-1(b)</b> Renewable energy generating facilities shall not be: Located within a scenic corridor as identified in the City of Corona 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	Review design and site plans	During plan check	Planning Division		
<b>MM4.1-1(c)</b> Renewable 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.	Review design and site plans	During plan check	Planning Division		
<b>MM4.1-2(a)</b> The minimum setback from any non-residential property line shall be equal to the system height.	Review design and site plans	During plan check	Planning Division		
<b>MM4.1-2(b)</b> The minimum setback from any residential property line shall be at least 1,500 feet.	Review design and site plans	During plan check	Planning Division		
<b>MM4.1-2(c)</b> Only one 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.	Review design and site plans	During plan check	Planning Division		
<b>MM4.1-2(d)</b> Renewable energy generating facilities not considered an accessory structure to an existing residence shall be prohibited in urbanized residential neighborhoods.	Review site plans	During plan check	Planning Division		
<b>MM4.1-2(e)</b> Residential properties less than 5 acres shall be limited to one accessory wind energy system that shall not exceed the height of the zone in which it is located.	Review design and site plans	During plan check	Planning Division		
<b>MM4.1-2(f)</b> Residential properties that are 5 acres and more shall be limited to two accessory wind energy systems that shall not exceed the height of the zone in which it is located.	Review design and site plans	During plan check	Planning Division		
<b>MM4.1-3(a)</b> All proposed 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.	Review design and site plans	During plan check	Planning Division		
<b>MM4.1-3(b)</b> All proposed energy-generating structures in open spaces areas shall not be lighted unless required by code or regulation.	Review design and site plans	During plan check	Planning Division		

**Table 11-1 Mitigation Monitoring Program for the C-CAP Final EIR**

<i>Mitigation Measure</i>	<i>Action Required</i>	<i>Monitoring Phase</i>	<i>Responsible Agency/ Party</i>	<i>Compliance Verification</i>	
				<i>Initial</i>	<i>Date</i>
<b>MM4.6-1</b> Prior to issuance of a Conditional Use Permit for construction of renewable energy-generating facilities in open space areas, the project proponent must submit a Land Evaluation and Site Assessment to determine whether any soils of statewide importance occur on the site.	Review design and site plans	Prior to issuance of permits	Planning Division		