

REVISED SECTION 4.4, VII. GREENHOUSE GAS EMISSIONS: The construction and operation of the MCP Build Alternatives and their design variations would result in significant effects related to greenhouse gas emissions if they:

- a) **Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment**
- b) **Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases**

Significant and Unavoidable (VII. a and b)

An assessment of greenhouse gas (GHG) emissions and climate change is provided later in Section 4.5, Climate Change. As shown later in Table 4.5.A, when compared to the No Build Alternative, the project alternatives would add up to 125 metric tons of CO₂ per day to the project area in 2020 and up to 277 metric tons of CO₂ per day to the project area in 2040. When added to the 15,344 metric tons of CO₂ that would be generated during construction of the Build Alternatives, it is estimated that the project would contribute up to 1,557,347 metric tons of CO₂ to the project area between 2020 and 2040. CEQA says that there is no “iron clad definition of significant effect” (State CEQA Guidelines Section 15064(b)), and so leaves it to a lead agency’s discretion to determine when GHG emissions are significant under CEQA (State CEQA Guidelines, Section 15064.4). Therefore, in the absence of a State-established numerical threshold and in an abundance of caution, RCTC has concluded that the proposed project would generate GHG emissions that may have a significant impact on the environment under CEQA.

The majority (98 to 99 percent as shown in Table 4.5.C) of these emissions is generated by on-road vehicles. Because RCTC does not have the legal authority to control on-road vehicle emissions, there are no measures that can be implemented by RCTC that would reduce this impact to less than significant. In addition, RCTC lacks the land use authority to construct off-site GHG reducing facilities, such as solar or wind farms, capable of offsetting some or all of the project’s emissions. Therefore, the proposed project would result in a significant unavoidable impact due to the generation of GHG emissions.

As discussed above, the MCP Build Alternatives would add up to 1,557,347 metric tons of CO₂ to the project area between 2020 and 2040. Within its 2011 update to the 2008 AB 32 Scoping plan, ARB determined that under Business-as-usual (BAU) conditions that the State’s 2020 GHG emissions would be 507 million metric tons. According to Executive Order S-3-05, California is required to reduce its annual

emissions to 1990 levels by 2020. ARB has established that the level of annual GHG emissions in 1990 for California was 427 million metric tons of “CO₂ equivalence” (CO₂e). To meet the 427 million metric ton goal the State would need to reduce the 2020 emissions by 80 million metric tons or approximately 15.8 percent from BAU. Based on the results shown in Table 4.5.A, in 2020 the MCP Build Alternatives would add up to 45,600 metric tons of CO₂ to the project area. By adding emissions to the project area that would not be generated under the No Build Alternatives conditions, the proposed build alternatives could delay the State’s goal of reducing the GHG emissions to 1990 levels by 2020. Therefore, the MCP Build Alternatives would conflict with the emission reduction goals in AB 32.

Evaluation of Potential Alternatives to Reduce or Avoid Significant Unavoidable Adverse Greenhouse Gas Emission Impacts of the MCP Build Alternatives

As discussed above, the MCP Build Alternatives would result in significant unavoidable GHG emission impacts with 98 to 99 percent of those emissions generated by on-road vehicles on the MCP facility. The following alternatives were considered to assess whether they would meet the project objectives and also reduce or avoid the significant unavoidable adverse GHG emission effects of the MCP Build Alternatives. Alternatives to reduce or avoid GHG emissions are limited to the No Build Alternatives and alternatives (such as transit alternatives) that would result in substantial reductions in on-road vehicle traffic compared to the MCP Build Alternatives.

No Build Alternatives 1A and 1B. No Build Alternatives 1A and 1B were evaluated in detail in the Recirculated Draft EIR/Supplemental Draft EIS. None of the improvements in the MCP Build Alternatives would be constructed under No Build Alternatives 1A and 1B. As a result, No Build Alternatives 1A and 1B would not result in the significant unavoidable GHG emission impacts that would occur under the MCP Build Alternatives. However, No Build Alternatives 1A and 1B would not meet the defined objectives for the project.

Alternatives Considered in the Studies Conducted for the Community and Environmental Transportation Acceptability Process (CETAP). The alternatives development process for the MCP project began with the Hemet to Corona/Lake Elsinore (HCLE) Corridor studies conducted for the CETAP. A Draft Tier 1 EIS/EIR for the HCLE Corridor was circulated for public review in July 2002. That Draft EIS/EIR considered 14 build alternatives between San Jacinto/Hemet and Corona/

Lake Elsinore. Those alternatives included highway alternatives, and transit alternatives such as expanded bus and commuter rail services. The analysis in support of that Draft EIR/EIS indicated the alternative with the greatest transportation benefit was a highway alternative (Alternative 1A) located along Ramona Expressway, Cajalco Road, and El Sobrante Road, with a connection to Interstate 15. That alternative best met traffic needs by providing the greatest benefits in terms of increases in speed, reductions in travel time, and congestion relief. The alternatives that focused on transit improvements did not perform as well as that alternative and, therefore, were not carried forward for detailed analysis in the Draft EIR/Draft EIS and the Recirculated Draft EIR/Supplemental Draft EIS for the MCP project. Because the transit based alternatives did not provide a comparable level of benefit for travelers as the highway alternative, they would not meet the project objectives. Although transit based alternatives may result in substantially reduced GHG emissions compared to the MCP Build Alternatives, they would not provide the mobility benefits to the traveling public that would occur with the MCP Build Alternatives and, therefore, would not meet the project objectives.

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