by approximately 41 acres due to a reduction associated with road improvements (calculated using the 40-foot buffer) and 11 acres associated with the WTGs. This would result in:

- A removal of up to nine WTGs in the northeast portion of the site to increase the distance between the WTGs and both Butterbredt Springs and the nearest golden eagle nest,
- A removal of up to 12 WTGs along either side of Cottonwood Creek to avoid riparian habitat, and
- A removal of up to 4 WTGs to avoid sensitive cultural resources (two of the WTGs overlap with those removed along Cottonwood Creek.)

Alternative C would achieve some of the project proponents’ objectives. Because the alternative would reduce the project by up to 23 WTGs, it would reduce the contribution towards achieving the California RPS goal (North Sky River Energy, LLC’s Objective 1) and would subsequently reduce the benefit renewable energy offers to greenhouse gas emissions (Objective 5). Although Alternative C may still be able to accommodate up to 116 WTGs, this alternative would only disturb 1,240 acres (compared to 1,292 acres of disturbance associated with the proposed project). Alternative C would result in less severe but nonetheless significant and unavoidable impacts on aesthetics, biological resources, cultural resources, and recreation. Air quality impacts would also be reduced if the removed WTGs are not sited at a different location on the project site.

Table 1-4 provides a summary of the alternatives impact analysis. A more detailed alternatives analysis is provided in Chapter 6, “Alternatives.”

1.6.1 Environmentally Superior Alternative

An EIR must identify the environmentally superior alternative to the proposed project. Alternative A: the No Project Alternative would be environmentally superior to the proposed project on the basis of the minimization or avoidance of physical environmental impacts. Section 15126.6(e)(2) of the State CEQA Guidelines states that if the no project alternative is found to be environmentally superior, “the EIR shall also identify an environmentally superior alternative among the other alternatives.”

Due to the reduction of impacts to aesthetics, biological resources, and cultural resources achieved by Alternative C (Reduced Project Size), it is considered the environmentally superior alternative. Alternative C reduces the significant and unavoidable impacts of the proposed project, although, not to acceptable levels, and has less severe significant impacts as compared to Alternative B. As described above, Alternative C would achieve most of the proposed project’s objectives.

1.7 Areas of Controversy

Areas of controversy were identified through written agency and public comments received during the scoping period. Public comments received during scoping are provided in Appendix A. In summary, the following issues were identified during scoping and are addressed in the appropriate sections of Chapter 4:

- Air Quality
  - Diesel particulate matter on nearby sensitive receptors
  - Fugitive dust plan
  - Stationary equipment that are a source of air pollutants will need a District permit
- Fugitive dust plan

- **Biological Resources**
  - Coordination with BLM, CDFG and USFWS
  - Survey protocols for southwestern willow flycatcher, least Bell’s vireo, and the desert tortoise
  - Common Ravens/Regional Common Raven Management Program
  - Avian/bat collision mortality
  - Habitat suitability and presence/absence surveys for the Mohave Ground Squirrel throughout Creosote Bush Scrub and Joshua Tree Woodland communities
  - Migratory birds
  - Cumulative impacts

- **Cultural Resources**
  - Consultation with Native American tribes
  - Presence of Native American monitor during initial study and environmental planning phases
  - Contact with California Historic Resources Information System
  - Discussion of the accidental discovery of human remains

- **Hazards and Hazardous Materials**
  - Impact on Kelso Valley Airport’s (CN37) use as a gliderport, heliport, and airport
  - Existing terrain limits the number of feasible ingress and egress routes to and from the CN37
  - Proposed WTG locations block or severely limit the use of two of the three primary approach routes, leaving one practical route to and from the CN37
  - Proposed WTG sites are densely clustered and positioned on ridges that normally provide additional lift for gliders attempting to return to the CN37
  - Red obstruction lighting of WTGs may be insufficient for the tops of the masts alone because blade tips extending more than 100 feet above the obstruction lights defeat the purpose of the proposed lighting; visibility of blades during high glare or night conditions
  - Increasing the height of the obstruction field with WTGs and eliminating ridge lines will change pilot’s transit strategy and decrease margins of safety

- **Hydrology and Water Quality**
  - Compliance with applicable water quality standards and prohibitions, including provisions of the Basin Plan
  - Temporary and permanent impacts to surface waters
  - Analyses of different storm event flows up to the 100-year storm event
  - Potential impacts to water quality with respect to beneficial uses
  - Stormwater impacts, particularly potential post-construction hydrologic impacts

- **Transportation and Traffic**
  - Potential impacts to SR 58/Sand Canyon Road and SR 14/Jawbone Canyon Road
  - Potential use of the northerly material site (near SR 178)
  - Construction Traffic Control Plan
  - Project trip generation associated with construction
− Encroachment/Transportation permits

1.8 Issues to Be Resolved

Section 15123(b)(3) of the CEQA Guidelines requires that an EIR contain issues to be resolved, which includes the choice among alternatives and whether or how to mitigate significant impacts. The following major issues are to be resolved:

- Determine whether the EIR adequately describes the environmental impacts of the Proposed project;
- Choose among alternatives;
- Determine whether the recommended mitigation measures should be adopted or modified; and
- Determine whether additional mitigation measures need to be applied to the proposed project.