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Conservation, Development and Planning
1195 Third Street, Suite 210
Napa, CA 94559
www.co.napa.ca.us

Main: (707) 253-4417
Fax: (707) 253-4336

Hillary Gitelman
Director

MEMORANDUM

To:	File No. P10-00377	From:	Linda St. Claire
Date:	August 15, 2011	Re:	Landmark Preservation Ordinance Update & CEQA Compliance

The General Plan Update adopted by the Napa County Board of Supervisors in June 2008 included goals, policies, and action items related to historic preservation. Specifically, Community Character Goal CC-4 called on the County to identify and preserve Napa County's irreplaceable cultural and historic resources for present and future generation and Goal CC-5 encouraged the reuse of historic buildings by providing incentives for their rehabilitation. Preservation policies mentioned incentives such as use of the State Historical Building Code, tax incentives, and development of a program that would allow owners of landmarks to apply for permission to reuse their buildings "for their historic use or a compatible new use" (Policy CC-27 and CC-28). Action Items called on the County to "consider amendments to the County zoning and building codes to improve the procedures and standards for property-owner initiated designation of County Landmarks, to provide for the preservation and appropriate rehabilitation of significant resources, and to incorporate incentives for historic preservation" (Action Item CC-19.2). In addition, the County committed to "amend the zoning ordinance to provide a discretionary process such as a use permit by which property owners may seek approval" for reuse of designated landmarks for their historic use or a compatible new use (Action Item CC-28.1).

The sum total of goals, policies and action items included in the General Plan was analyzed in a program-level Environmental Impact Report (EIR) prepared for the General Plan Update (SCH# 2005102088, certified June 2008). To determine whether the program-level EIR prepared for the General Plan Update adequately describes the proposed Landmark Preservation Ordinance Update, County planning staff has utilized the attached checklist ("initial study"), and has considered the following:

- o The Landmark Preservation Ordinance Update is proposed as three separate actions:
 - (1) adoption of an ordinance updating the criteria and procedures for landmark designation, allowing for reuse of five farm centers and grange halls, and providing

- tax-related incentives for landmarks that consist of historic homes, school houses, religious buildings, and agricultural buildings (other than wineries and distilleries);
- (2) adoption of a second ordinance providing an incentive for the rehabilitation of historic resorts and commercial buildings by allowing them to be reused for their historic uses or uses that are allowed in the Commercial Limited (CL) and Commercial Neighborhood (CN) zoning districts (whichever is less intense); and
 - (3) adoption of a resolution establishing a “Mills Act” tax incentive program for qualified historic resources where the owner agrees to execute a contract related to rehabilitation and maintenance.
- The County has a survey of historic resources dating from 1978, although some resources have been lost or altered since then, and a comprehensive update would be costly and time consuming. As a result, County staff and consultants have focused first on updating the list of commercial and resort buildings that might qualify for the incentive program provided by the second ordinance. This list includes a list of approximately 10 resources that might benefit from the second ordinance.
 - Some of these commercial and resort buildings already have the ability to be used for uses allowed in the Commercial Limited Commercial Neighborhood (CN) zoning districts, and others would require site specific environmental review before they could qualify under the new program and be rehabilitated for historic or alternative uses.
 - All of the historic resources that would be affected by the proposed ordinances and resolution already exist, and their rehabilitation and reuse would “infill” new uses within existing buildings that have stood the test of time and contribute to our understanding of the County’s past.

Following consideration of these factors and preparation of the attached initial study checklist, the County’s Department of Conservation, Development and Planning has concluded that the proposed Landmark Preservation Ordinance Update falls within the scope of the General Plan approved in 2008, that the program EIR prepared for the General Plan Update adequately describes the activity for purposes of CEQA, and that there have been no changes in the General Plan, changes in circumstances under which the General Plan Update was adopted, or new information of substantial importance that would necessitate subsequent environmental review pursuant to CEQA Guidelines Section 15168. This conclusion and the proposed Landmark Preservation Ordinance Update are subject to review and adoption by the Napa County Board of Supervisors, following receipt and review of a recommendation from the Napa County Planning Commission.

A copy of the General Plan Update EIR may be reviewed during business hours at the offices of the Department of Conservation, Development and Planning, 1195 Third Street in Napa, or on the County’s website at <http://www.countyofnapa.org/Pages/DepartmentDocuments.aspx?id=4294967660>.

COUNTY OF NAPA
CONSERVATION, DEVELOPMENT & PLANNING DEPARTMENT
1195 THIRD ST., SUITE 210
NAPA, CA 94559
(707) 253-4416

Initial Study Checklist
(form updated September 2010)

1. **Project Title:** Landmark Preservation Ordinance Update (Project No. P10-00377), consisting of two proposed ordinances that would amend various provisions of the Napa County Code and one resolution that would establish a Mills Act program.
2. **Property Owner:** The project would apply to all properties within unincorporated Napa County that meet the criteria for landmark designation and would offer different incentives to the different types of landmark buildings.
3. **County Contact Person, Phone Number and email:** Linda St. Claire (707) 299-1348
Linda.stclaire@countyofnapa.org
4. **Project Location and APN:** The project would apply to all properties within unincorporated Napa County that meet the criteria for landmark designation and would offer different incentives to the different types of landmark buildings.
5. **Project sponsor's name and address:** Napa County Department of Conservation, Development & Planning, 1195 Third Street, Suite 201, Napa, CA 94559
6. **General Plan description:** The project would apply throughout unincorporated Napa County in all general plan designations.
7. **Zoning:** The project would apply throughout unincorporated Napa County in all zoning districts.
8. **Description of Project: Project Description:** The proposed project consists of adoption of two ordinances, updating Napa County Code sections related to the designation and disposition of historic resources and adoption of a related resolution establishing a Mills Act program in unincorporated Napa County. The first ordinance would update the procedures and standards for the preservation and appropriate rehabilitation of historic resources when property owners voluntarily apply for, and are awarded, landmark designation. The ordinance also contains incentives for the rehabilitation and reuse of landmark designated historic buildings which are considered significant to the County's agricultural heritage by (1) allowing historic residences, barns, churches, schoolhouses, dairies, and stables/blacksmith shops to be eligible for Mills Act contracts, (2) allowing farm centers and grange halls to be used as a matter of right as meeting halls and special event venues (APN #s 030-180-009, 020-282-001, 052-112-016, 047-110-004 & 018-100-001), and (3) by clarifying that all historic resources are eligible to use the state

historical building code. The ordinance would also reference and incorporate ghost winery provisions contained elsewhere in the code.

The second ordinance would supplement the first ordinance and would allow historic commercial/resort buildings that are designated as landmarks to be rehabilitated and adaptively reused for their historic use or for uses allowed in the Commercial Limited and (CL) Commercial Neighborhood (CN) zoning districts (whichever is less intense) upon issuance of a use permit following project and site specific environmental review under CEQA.

The proposed resolution would establish a Mills Act program allowing owners of eligible historic resources such as historic residences, barns, churches, schoolhouses, dairies, and stables/blacksmith shops to enter into contracts to obtain tax incentives in exchange for maintaining the resource. The proposed ordinances and resolution would implement action items included in the General Plan Update of 2008.

9. Describe the environmental setting and surrounding land uses.

Napa County is a rural county of over 500,000 acres within the San Francisco Bay Area. Approximately 95% of the County lies outside of incorporated jurisdictions, and all of this land, with the exception of land in State or federal jurisdiction, is subject to the land use authority of the Napa County Board of Supervisors. The County is sparsely populated and for the most part does not contain urban infrastructure such as water and sewer services. Transportation facilities are also limited, with mostly two lane State highways and County roads.

A 1978 Historic Survey, conducted as a joint endeavor between the cities and unincorporated jurisdictions of Napa County, produced a list of historic resources in the unincorporated parts of the county. Some of the identified resources no longer exist, and other buildings are now potentially eligible for recognition, although a current and comprehensive survey of potential resources would be costly and time consuming. In order to update the list of potential historic resources consisting of commercial/resort buildings that would be eligible for the incentive in the second ordinance, a focused survey was conducted and determined that approximately ten properties currently exist that would be eligible. (A copy of the 1978 survey and the updated inventory of commercial/resort properties is available for public review during regular business hours at the Conservation, Development and Planning Department, 1195 Third Street, Suite 210 in Napa, California.)

A full description of the County, its environment, and land uses is provided under each subject heading within Chapter 4.0 Environmental Setting, Impacts, and Mitigation Measures of the Draft EIR prepared for the General Plan Update (SCH# 2005102088, certified June 2008). (The General Plan Update EIR is also available for review at the Conservation Development and Planning Department , 1195 Third Street, Suite 210 in Napa, California and online at <http://www.countyofnapa.org/Pages/DepartmentDocuments.aspx?id=4294967660>.)

10. Other agencies whose approval is required. None.

ENVIRONMENTAL IMPACTS AND BASIS OF CONCLUSIONS:

The conclusions and recommendations contained herein are professional opinions derived in accordance with current standards of professional practice. They are based on the survey work referenced above as

well as a review of the Napa County Environmental Resource Maps, the other sources of information listed in the file, and the comments received, conversations with knowledgeable individuals and the preparer's personal knowledge of the area. For further information, see the environmental background information contained in the permanent file on this project.

On the basis of this initial evaluation:

- X I find that the proposed project is within the scope of the 2008 General Plan Update.
- X I find that the program-level EIR prepared for the 2008 General Plan Update adequately describes the project for the purposes of CEQA.
- X I find that there have been no changes to the General Plan, no changes to circumstances, and no new information of substantial importance that would necessitate supplemental environmental review.



August 15, 2011
Date

Linda St. Claire, Planner
Napa County Department of Conservation, Development & Planning

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
I. AESTHETICS. Would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion: As discussed herein, the General Plan Update EIR contained a projection of anticipated population, employment, and vineyard development in the unincorporated County from 2005 to 2030. The Landmark Preservation Ordinance Update would neither hasten nor impede land use changes anticipated in the General Plan Update EIR because no re-designation of land, no rezoning, and no general plan amendments are required. There is a potential for historic buildings to deteriorate further without preservation and any effect on scenic vistas would be improved upon the preservation of a historic building. Restoring recognized historic buildings and sites would improve rather than degrade the existing visual character thus preserving the Napa County landscape. Historic buildings and sites, like granges, farm centers, churches, school houses and ghost wineries are an integral part of Napa County's landscape and there is no evidence that substantial adverse impacts would occur if these existing, historic buildings are rehabilitated and reused. Preservation and reuse of these structures would be provided with incentives as called for in the General Plan. Mitigation measures adopted as part of the General Plan (continued implementation of the Viewshed Protection Program, retention of trees along public roadways, retention of landscape characteristics for new roadway construction, requirements for visual compatibility, requirements related to light and glare) would continue to apply (See Measures 4.14.1 & 2). Also, any visual changes proposed as part of the rehabilitation and reuse of historic commercial or resort buildings would be subject to project-specific review under CEQA.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
II. AGRICULTURE AND FOREST RESOURCES.¹ Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Important (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land as defined in Public Resources Code Section 12220(g), timberland as defined in Public Resources Code Section 4526, or timberland zoned Timberland Production as defined in Government Code Section 51104(g)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

¹ "Forest land" is defined by the State as "land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits." (Public Resources Code Section 12220(g)) The Napa County General Plan anticipates and does not preclude conversion of some "forest land" to agricultural use, and the program-level EIR for the 2008 General Plan Update analyzed the impacts of up to 12,500 acres of vineyard development between 2005 and 2030, with the assumption that some of this development would occur on "forest land." In that analysis specifically, and in the County's view generally, the conversion of forest land to agricultural use would constitute a potentially significant impact only if there were resulting significant impacts to sensitive species, biodiversity, wildlife movement, sensitive biotic communities listed by the California Department of Fish and Game, water quality, or other environmental resources addressed in this checklist.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
d) Result in the loss of forest land or conversion of forest land to non-forest use in a manner that will significantly affect timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, or other public benefits?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion: The Landmark Preservation Ordinances and Resolution would have the effect of encouraging land owners to consider preserving historic structures in their existing settings. The possible reuse of historic structures would not alter agricultural activities in surrounding areas, and any existing Williamson Act contracts would remain in effect, limiting the non-agricultural uses allowed on the affected parcel. Also, if historic commercial and resort buildings are proposed for reuse because of incentives created by the Landmark Preservation Ordinance Update, the proposals would require a use permit and a specific finding that: "the adaptive reuse is compatible with agriculture because it does not displace an agricultural use, conflict with a Williamson Act contract, or increase the likelihood of conflicts between users of the site and nearby agricultural activities." This required finding would ensure that proposals to reuse historic commercial and resort buildings would have no significant effect on agricultural resources.

The proposed ordinances could allow non-agricultural uses within historic commercial and resort buildings where those uses would not be allowed by current zoning. Some stakeholders have argued that this would be inconsistent with the County's Measure P (2008), which prohibits the Board of Supervisors from making certain General Plan amendments (e.g. re-designating agricultural land or modifying the "intent" of the agricultural land use designations) without voter approval except in certain narrow exceptions. In the current instance, no General Plan amendment would be required. A limited number of historic commercial and resort properties (approximately ten resources) exist in the county, and if their owners choose to take advantage of the proposed ordinance, they would have to apply for a use permit and demonstrate that the proposed intensity of use does not exceed the historic intensity of use. They could also not expand the historic buildings more than 500 square feet and would have to comply with the Secretary of the Interior's Standards for preservation projects. While the applicability of Measure P may be considered by the Board of Supervisors when it considers adoption of the second proposed ordinance, the General Plan itself acknowledges the presence of these limited resources and found that: "due to the small number of existing historic buildings in the County and the requirement that their historic reuse be compatible with agriculture, such limited development will not be detrimental to the Agriculture, Watershed or Open Space policies of the General Plan. Therefore such development is consistent with the goals and policies of the General Plan" (Policy CC-28).

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion: Adoption of the ordinances and resolution, related to the designation and disposition of historic landmarks, will not create air pollution in volumes substantial enough to result in an air quality plan conflict. The proposed ordinances, establish regulations and standards regarding the preservation, rehabilitation and incentives for the preservation of historic resources would not directly increase traffic volumes. To the extent that incentives offered by the ordinance stimulate reuse of existing buildings, some increase in traffic and air

pollution may occur. Cumulative traffic increases and development were found to result in significant and unavoidable air quality impacts by 2030 in the program EIR for the General Plan Update. The proposed project would not change these findings, although any rehabilitation and reuse of eligible historic commercial and resort properties would be subject to project specific-review under CEQA, providing an opportunity for project-specific mitigation measures if available.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES. Would the project:				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion: The ordinances and resolution would not in themselves cause any impacts upon biological resources. Eligible historic buildings are already part of the existing setting and therefore, their rehabilitation and reuse is not likely to interfere with biological resources. Also, rehabilitation and reuse of historic buildings could somewhat reduce the significant cumulative impact on sensitive biotic communities identified in the General Plan EIR because rehabilitation and reuse effectively encourages developers to focus on preservation and reuse of existing buildings and sites rather than focusing on construction of new structures and vacant sites. To the extent that the reuse and/or rehabilitation of eligible historic commercial and resort buildings could have impacts on biological resources, these projects would be reviewed on a site-specific basis under CEQA.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion: The proposed ordinances and resolution would neither hasten nor impede land use and development changes anticipated in the General Plan EIR, which found that there could be significant and unmitigable impacts to historic resources if those changes resulted in the removal of historic buildings. The ordinances would not cause buildings to be removed or result in sub-surface excavation that might affect buried archaeological resources or human remains, although preservation of a structure may necessitate structural improvements to meet the California Building Code requirements. Less than significant and significant and mitigable impacts identified in the General Plan EIR would not change and mitigation measures adopted as part of the General Plan would continue to apply.

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
VI.	GEOLOGY AND SOILS. Would the project:				
	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.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	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 on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1997), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion: The proposed ordinances and resolution would neither hasten nor impede land use and development changes anticipated in the General Plan EIR, which found that there could be significant and unmitigable impacts associated with exposing additional residents and employees to seismic events and other geologic hazards. The ordinances would not cause or exacerbate hazards and historic buildings that are proposed for reuse due to the incentives offered. They would be required to conform with structural requirements contained in the California Historical Building Code. Less than significant and significant and mitigable impacts identified in the General Plan EIR would not change and mitigation measures adopted as part of the General Plan would continue to apply. (See Measures 4.10.1-4.)

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
VII.	GREENHOUSE GAS EMISSIONS. Would the project:				
	a) Generate a net increase in greenhouse gas emissions in excess of applicable thresholds adopted by the Bay Area Air Quality Management District or the California Air Resources Board which may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	b) Conflict with a county-adopted climate action plan or another applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion: The General Plan Update EIR estimated GHG emissions associated with development in unincorporated Napa County during the life of the General Plan (2005 to 2030) by estimating emissions associated with population growth (about 246,557 MT), increases in vehicle miles travelled (about 380,459 MT), residential growth (43,392 MT), and non-residential energy use (162,473 MT).² The General Plan Update EIR concluded that a significant, unmitigable impact could result from emissions associated with growth and development over the life of the General Plan.

Since the General Plan Update was adopted, the Napa County Department of Conservation, Development & Planning, working with the Napa County Department of Environmental Management and consultants at ICF have been working on a Climate Action Plan for unincorporated Napa County. The Climate Action Plan is intended to provide an updated baseline inventory of green house gas (GHG) emissions from all sources in unincorporated Napa County as well as strategies for reducing those emissions to 1990 levels by 2020, consistent with California Assembly Bill 32 from 2006 (AB 32).

The ordinances and resolution would not, on their own, increase green house gas emissions or make it more difficult for the County to achieve its AB 32 objectives. The preservation and reuse of buildings which qualify as historic resources could result in some GHG emissions, but could also avoid emissions associated with construction of new buildings. GHG emissions associated with the reuse of eligible commercial/resort buildings would be analyzed during project-specific review under CEQA.

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
VIII.	HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
	a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	b) Create a significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	f) For a project within the vicinity of a private airstrip, 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	h) Expose people or structures to a significant risk of loss, injury or death involving wild-land fires, including where wild-lands are adjacent to urbanized areas or where residences are intermixed with wild-lands?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion: The proposed ordinances and resolution will not themselves stimulate the transport, use or disposal of hazardous waste, and would not exacerbate any existing hazards. The Pope Valley Store site (018-310-023) is listed as a hazardous site on Napa County

² All estimates are presented in metric tons of Carbon Dioxide (CO2) equivalents, and reflect Alternative A in the General Plan EIR (See Final EIR pp. 3.0-56 through -58). As noted in the text of the Final EIR, emissions associated with the Preferred Plan were estimated to fall between those associated with Alternatives A and C.

GIS maps, although remediation has been conducted and is now complete. Site specific analysis will occur under CEQA for all commercial and resort buildings proposed for rehabilitation and reuse. In addition, all buildings and sites in the County are subject to State and federal laws regarding asbestos and lead paint abatement, as well as the transport, storage, and disposal of hazardous materials. Site specific CEQA analysis will occur for potential historic building(s) and sites in regards to airports and airstrips within two miles. Likewise, the ordinances and resolution will not impair implementation of emergency response and/or evacuation plans nor expose people or structures to a significant risk of loss, injury or death involving wild-land fires. Site specific CEQA analysis will also occur for these issues as well. Less than significant and significant and mitigable impacts identified in the General Plan EIR would not change and mitigation measures adopted as part of the General Plan would continue to apply. (See Measures 4.9.2, 4.9.4 & 4.2.2.)

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
IX. HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j) Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion: As discussed earlier, the proposed ordinances and resolution would neither slow nor hasten development assumed to occur during the life of the General Plan and analyzed in the General Plan EIR. As a result, impacts described in the General Plan EIR related to erosion, runoff, water supplies, flooding, and other hydrologic issues would remain as described in the earlier EIR. In addition, mitigation measures adopted as part of the General Plan Update would continue to apply and all reuse of commercial and resort historic properties would require site specific analysis under CEQA. (See Measures 4.11.2-5 & 4.11.9.)

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
X. LAND USE AND PLANNING. Would the project:				

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion: The proposed ordinances and resolution would not in themselves result in land use changes which would divide a community or conflict with existing plans or policies. The ordinances would be consistent with the County's General Plan. Policy CC-28 of the Napa County General Plan recognizes that due to the small number of existing historic buildings in the County and the requirement that their historic reuse be compatible with agriculture, such limited development will not be detrimental to the Agricultural, Watershed or Open Space policies. Therefore, such development is consistent with all of the goals and policies of the General Plan. The reuse or rehabilitation of eligible historic commercial and resort buildings will meet the general plan requirements for updating the Landmark Preservation Ordinance in Napa County. For these reasons, no significant impacts would remain as described in the General Plan EIR.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
XI. MINERAL RESOURCES. Would the project:				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion: The proposed ordinances and resolution do not involve the use of mineral resources and would not preclude their use in any way. The General Plan Update EIR does not identify potentially significant impacts affecting mineral resources, and no mitigation measures would apply.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
XII. NOISE. Would the project result in:				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion: The proposed ordinances and resolution would not change the nature, scope, or timing of development anticipated under the General Plan Update, and thus would not result in unanticipated noise impacts. The County's noise ordinance would continue to govern construction activities and ongoing operations, and the noise compatibility standards within the General Plan would continue to apply. These and other mitigation measures adopted as part of the General Plan would remain in effect. (See Measures 4.7.1-2, 4.7.4, & 4.7.7.) Any reuse and/or rehabilitation of eligible historic commercial and resort buildings would be reviewed on a site specific basis under CEQA.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
XIII. POPULATION AND HOUSING. Would the project:				
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion: The proposed ordinances and resolution may stimulate some employment and also provide an incentive for some historic buildings to be rehabilitated. Growth would not exceed levels anticipated in the General Plan EIR and would all occur within existing structures. None of these actions/requirements would result in land use changes or stimulate population or job growth beyond what was anticipated in the General Plan Update EIR. Impacts would remain as described in the General Plan EIR, and mitigation measures adopted as part of the plan would remain in effect. (See Measures 4.3.1-2.)

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
XIV. PUBLIC SERVICES. Would the project result in:				
a) 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:				
Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion: The proposed ordinances and resolution would not require modifications to existing County facilities. The ordinances would also not change development projections or the need for services anticipated by the General Plan EIR. The reuse and/or rehabilitation of eligible historic commercial and resort buildings would be reviewed on a site specific basis under CEQA. Mitigation measures adopted as part of the General Plan would continue to apply. (See Measures 4.13.1.1, 4.13.2.1, 4.13.3.1, & 4.13.4.1.)

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
XV. RECREATION. Would the project:				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion: The ordinances and resolution would not change development projections or the use of recreational facilities. Mitigation measures adopted as part of the General Plan would continue to apply. (See Measure 4.13.9.1.)

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
XVI. TRANSPORTATION/TRAFFIC. Would the project:				
a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system and/or conflict with General Plan Policy CIR-16, which seeks to maintain an adequate Level of Service (LOS) at signalized and unsignalized intersections, or reduce the effectiveness of existing transit services or pedestrian/bicycle facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 Napa County Transportation and Planning Agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature, (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with General Plan Policy CIR-23, which requires new uses to meet their anticipated parking demand, but to avoid providing excess parking which could stimulate unnecessary vehicle trips or activity exceeding the site's capacity?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion: The ordinances and resolution do not themselves increase traffic demand in Napa County, although it could create incentives for the reuse of existing buildings, which could result in increased traffic and parking demand. The General Plan exhaustively analyzed traffic issues in the County and found them to be significant and unavoidable on a number of State and County roads. For example, segments of State Route 29 between Oakville Cross Road and Deer Park Road, and sections of Deer Park Road could experience significant congestion/delays in future year 2030. The preservation and/or reuse of historic structures would affect a limited

number of existing buildings and is unlikely to change the findings of the General Plan EIR's analysis. Actions taken by landowners to reuse commercial and resort historic resources would necessitate site specific analysis under CEQA to determine whether site-specific traffic and parking impacts would occur, and to quantify their contributions to the cumulative traffic congestion identified in the General Plan EIR. If significant impacts or considerable contributions (to cumulative impacts) are identified, they may necessitate installation of new traffic controls or other measures to reduce congestion and maintain public safety. Mitigation measures identified in the General Plan EIR and adopted as part of the General Plan would also remain in effect. (See Measures 4.4.1, 4.4.4, 4.9.4, & 4.13.1.1.)

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
XVI. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Require or result in the construction of a new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require or result in the construction of a new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion: The proposed ordinances and resolution would not in themselves affect the utilities and service systems in Napa County. The incentives offered could lead to the construction of some new facilities, septic systems and wells, but new facilities would be relatively small and would require permits from the County or the Regional Water Quality Control Board. In some cases, additional environmental review may be needed, on a site specific basis, but there is no reason to believe that there would be significant impacts. Mitigation measures adopted as part of the General Plan Update would continue to apply.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
XVII. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project 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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion: The General Plan EIR examined potential cumulative effects within unincorporated Napa County by using reasonable projections of land use and development changes in the County between 2005 and 2030. It also considered the cumulative effects of the County's actions when combined with actions by other agencies. The ordinances and resolution do not alter this analysis. Potential historic resources must meet stringent criteria to become designated landmarks, thus limiting the number of resources being considered for incentives in the proposed ordinances. Preserving existing resources will also prevent the loss of endangered plants, animals and other important examples of California history to the extent it diminishes the amount of new construction that occurs.