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## CEQA Memorandum



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**Planning, Building & Environmental Services**

1195 Third Street, Suite 210  
Napa, CA 94559  
www.countyofnapa.org

**David Morrison**  
Director

MEMORANDUM

To: Planning Commission From: Jason R. Hade, AICP, Planner III

Date: July 5, 2017 Re: Draft Climate Action Plan 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 green house gas emissions, sustainability, and climate change. Action Item CON CPSP-2 specifically called on the County to develop a GHG emissions inventory in a manner consistent with AB 32 and then to develop an emission reduction plan that included consideration of a “green building” ordinance and other mechanisms “shown to be effective at reducing emissions.” By including Action Item CON CPSP-2 in the General Plan, the County implemented Mitigation Measure 4.8.7a from the program-level Environmental Impact Report (EIR) prepared for the General Plan Update (SCH# 2005102088, certified June 2008), and committed to take the steps that it is now proposing to take via consideration and adoption of the proposed Climate Action Plan.

To determine whether the program-level EIR prepared for the General Plan Update adequately described the proposed Climate Action Plan, County planning staff has utilized the attached checklist (“initial study”), and has considered the following:

1. Preparation of a GHG emission reduction plan like the proposed Climate Action Plan is clearly called for in General Plan Action Item CON CPSP-2, and is therefore within the scope of the General Plan.
2. The program level EIR prepared for the General Plan Update contained an extensive discussion of climate change and GHG emissions in Section 3.4.4 of the Final EIR, including potential strategies for reducing emissions in compliance with AB 32.
3. When certifying the program-level EIR prepared for the General Plan Update, the Napa County Board of Supervisors concluded that impacts related to GHG emissions from development that might occur within the County during the time period of the General Plan (i.e. 2005-2030) would be significant and unavoidable, despite the adoption of a mitigation measure requiring the preparation of an emission reduction plan such as the Climate Action Plan now proposed. This conclusion was conservative because the Board did not pre-suppose that the adopted mitigation measure could or would be effective at reducing emissions to an acceptable level. The proposed Climate Action Plan would,

- however, reduce GHG emissions to 1990 levels by 2020 consistent with AB 32, and would effectively mitigate the impact.
4. Since the program-level EIR was certified and the General Plan Update was adopted, there have been no changes within the County that would tend to increase GHG emissions beyond what was projected in the EIR.
  5. Since the program-level EIR was certified and the General Plan Update was adopted, the Bay Area Air Quality Management District (BAAQMD) has updated their guidelines for local agencies and has provided both explicit thresholds of significance for GHG emissions, and standards for “qualified” climate action plans. The State and Napa County have also updated their CEQA Guidelines to explicitly address the issue of GHG emissions.
  6. The proposed Climate Action Plan updates the GHG emissions estimates included in the General Plan Update EIR. The updated emissions inventory and forecast included in the Climate Action Plan are based on guidance from State and regional agencies, and the proposed Plan utilizes both an accepted methodology and reasonable assumptions to estimate the effectiveness of emission reduction measures, as described further within the plan.

Following consideration of these factors and preparation of the attached initial study checklist, the County’s Department of Planning, Building, and Environmental Services has concluded that the proposed Climate Action Plan 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 15162. This conclusion and the proposed Climate Action Plan 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>. Reviewers are particularly directed to Section 3.4.4 of the Final EIR (on the website, see the document called “FEIR Responses Intro” and scroll to p. 3.0-49).

# APPENDIX C

COUNTY OF NAPA  
PLANNING, BUILDING AND ENVIRONMENTAL SERVICES DEPARTMENT  
1195 THIRD STREET SUITE 210  
NAPA, CA 94559  
(707) 253-4416

## Initial Study Checklist (form updated October 2016)

1. **Project Title:** Climate Action Plan
2. **Property Owner:** The project would apply to all properties within unincorporated Napa County.
3. **County Contact Person, Phone Number and email:** Jason R. Hade, AICP, Planner III, (707) 259-8757; jason.hade@countyofnapa.org
4. **Project Location and APN:** The project would apply to all properties within unincorporated Napa County.
5. **Project sponsor's name and address:** Napa County Department of Planning, Building, and Environmental Services, 1195 Third Street, Suite 210, Napa, CA 94559
6. **General Plan description:** N/A (Countywide)
7. **Zoning:** N/A (Countywide)
8. **Description of Project.**

### Description of the Climate Action Plan

The County of Napa proposes to adopt a Climate Action Plan (CAP) to identify measures and actions to reduce greenhouse gas (GHG) emissions consistent with State and regional guidance. A Climate Action Plan (CAP) is a document that includes policies, measures, and strategies to improve the health, safety, mobility, and livability of the greater community. The objectives of a CAP are to reduce greenhouse gas (GHG) emissions, streamline California Environmental Quality Act (CEQA) review by serving as a "qualified GHG reduction plan," and prioritize measures to comply with California environmental and land use planning laws. The CAP provides measures, also referred to as GHG reduction strategies in the sectors of building energy, on road transportation, solid waste, off road vehicles and equipment, agriculture, land use change, and wastewater. A list of all GHG reduction strategies and measures can be found in Chapter 3 of the CAP.

This CAP provides a comprehensive roadmap to address the challenges of climate change in Napa County. Acting on climate change means both reducing GHG emissions from local sources in the unincorporated county and helping the community to adapt to climate change and improve its resilience over the long term.

The key components of the climate action planning process represented in this CAP are: a baseline GHG emissions inventory; GHG emissions forecasts and reduction targets; local GHG emissions and reduction strategies and measures; a climate change vulnerability assessment; and implementation and monitoring mechanisms.

### Background and Regulatory Framework

In 2005, Governor Arnold Schwarzenegger signed Executive Order S-3-05, which directed California to reduce GHG emissions to 1990 levels by 2020, and to 80 percent below 1990 levels by 2050. A year later, in 2006, the Global Warming Solutions Act (Assembly Bill [AB] 32) was passed, establishing regulatory, reporting, and market mechanisms to achieve quantifiable reductions in GHG emissions. AB 32 put a cap on GHG emissions, setting a target of reducing GHG emissions to 1990 levels by 2020. As part of its implementation of AB 32 and Executive Order S-3-05, the California Air Resources Board (ARB) developed a Scoping Plan in 2008. The Scoping Plan, along with its Update in 2013, describes the approach California will take to reduce GHGs to achieve reduction targets and goals. California is currently on track to meet or exceed the AB 32 current target of reducing GHG emissions to 1990 levels by 2020.

On April 20, 2015 Governor Edmund G. Brown Jr. signed Executive Order B-30-15, establishing a new GHG emissions reduction

target 40 percent below 1990 levels by 2030. This target aligns with those of leading international governments such as the 29-nation European Union which adopted the same target in October 2014. Executive Order B-30-15 also directed ARB to update the AB 32 Scoping Plan to reflect the path to achieving the 2030 target. In September 2016, Governor Brown also signed Senate Bill (SB) 32, which codified into statute the mid-term 2030 target established by Executive Order B-30-15. The new 2030 GHG emissions reduction target places California on a trajectory towards meeting the goal of reducing statewide emissions to 80 percent below 1990 levels by 2050.

In addition to legislation setting statewide GHG reduction targets, SB 375, signed by the Governor in 2008, better aligned regional transportation planning efforts, regional GHG emissions reduction targets, and land use and housing allocations. SB 375 requires Metropolitan Planning Organizations (MPOs) to adopt a Sustainable Communities Strategy (SCS) or Alternative Planning Strategy, showing prescribed land use allocations in each MPO's Regional Transportation Plan. ARB, in consultation with the MPOs, provides each affected region with reduction targets for GHGs emitted by passenger cars and light trucks in their respective regions for 2020 and 2035.

To effectively address the challenges that a changing climate will bring, the State also prepared the 2009 California Climate Adaptation Strategy, which highlights climate risks and outlines possible solutions that can be implemented throughout the State. This Strategy was updated in 2014 and is now known as Safeguarding California. In 2015, the State developed the Safeguarding California Implementation Action Plans.

Over the last decade, the County of Napa (County) has taken several steps to begin addressing climate change and achieving reductions in GHG emissions, both in the County's operations as well as the broader community. Dating as far back as 2007, the County has been involved in various efforts to quantify GHG emissions sources and formulate reduction strategies on both a county and larger regional level. The County's General Plan and Environmental Impact Report (EIR) called for development and adoption of a CAP. This CAP builds upon the County's past efforts fulfills the requirements of the County's General Plan and EIR. This CAP includes a GHG inventory for 2014 and forecasting emissions for 2020, 2030 and 2050 to comply with new legislation. Other notable County efforts are highlighted below.

- **GHG Reduction Plan for County Municipal Operations:** In 2007, the Napa County Department of Public Works, together with Kenwood Energy, performed a separate inventory and prepared a reduction plan for the GHG emissions associated with the County's municipal operations. The Emissions Reduction Plan identified a suite of actions that would result in reducing emissions from government operations by 15 percent by 2020 (Napa County 2007). In 2015, the County updated the GHG emissions inventory for County operations (Napa County 2015). A 10 percent reduction has been achieved so far.
- **Napa County General Plan (2008):** The County General Plan provides the foundation upon which all future land use and public investment decisions are based. It is a guide for the development of all planning documents, including this CAP, which must be consistent with General Plan Policies. The General Plan includes policies aimed at reducing local contributions to global climate change and encouraging sustainable building practices, sustainable vineyard practices, and ecological stewardship. The General Plan's Environmental Impact Report (EIR) specifically directed the County to develop a CAP as an implementation action and mitigation measure to reduce GHG emissions in the county and address climate change impacts (Mitigation Measure M-4.8.7a).

### Projected Climate Change Impacts in Napa County

A climate change vulnerability assessment was prepared, along with climate adaptation measures to help build community resilience. The climate change vulnerability assessment (Appendix C of the CAP) determined that the County is vulnerable to several adverse impact climate change effects including:

- Increases in average temperatures and the frequency of heat waves and extreme heat events;
- Changes to precipitation patterns;
- Increased risk of wildfire;
- Increased likelihood of flooding; and,
- Increased risk of coastal flooding from sea-level rise.

Specific adaptation measures are included in Chapter 4 to address these effects. Many of the measures require the County and other partnering agencies to address climate-related risks as part of existing planning processes, as well as move towards

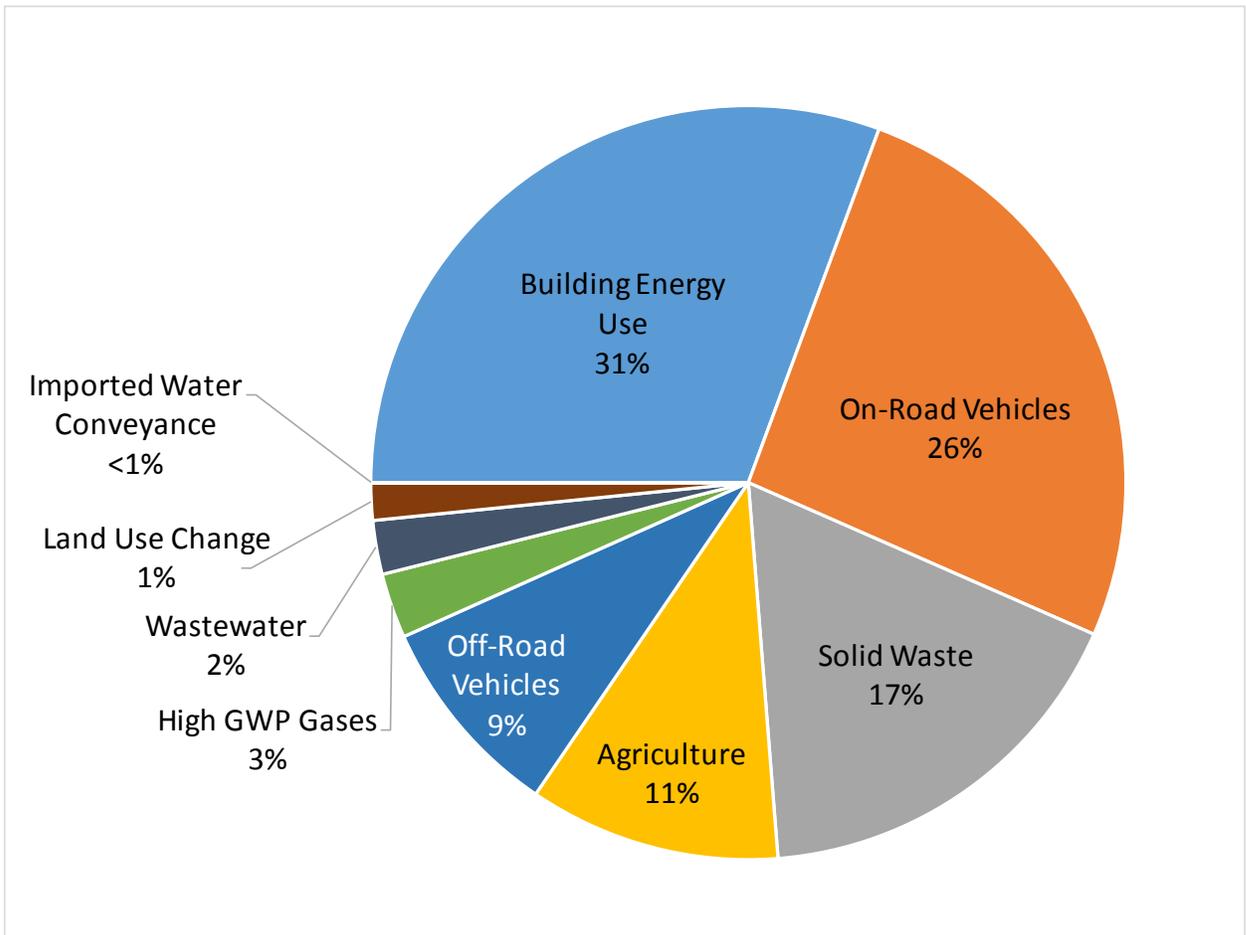
incremental changes in the way that County services and infrastructure are maintained and operated. Community education and awareness-building are also important components of the adaptation strategies.

### GHG Inventory, Baseline, and Projections

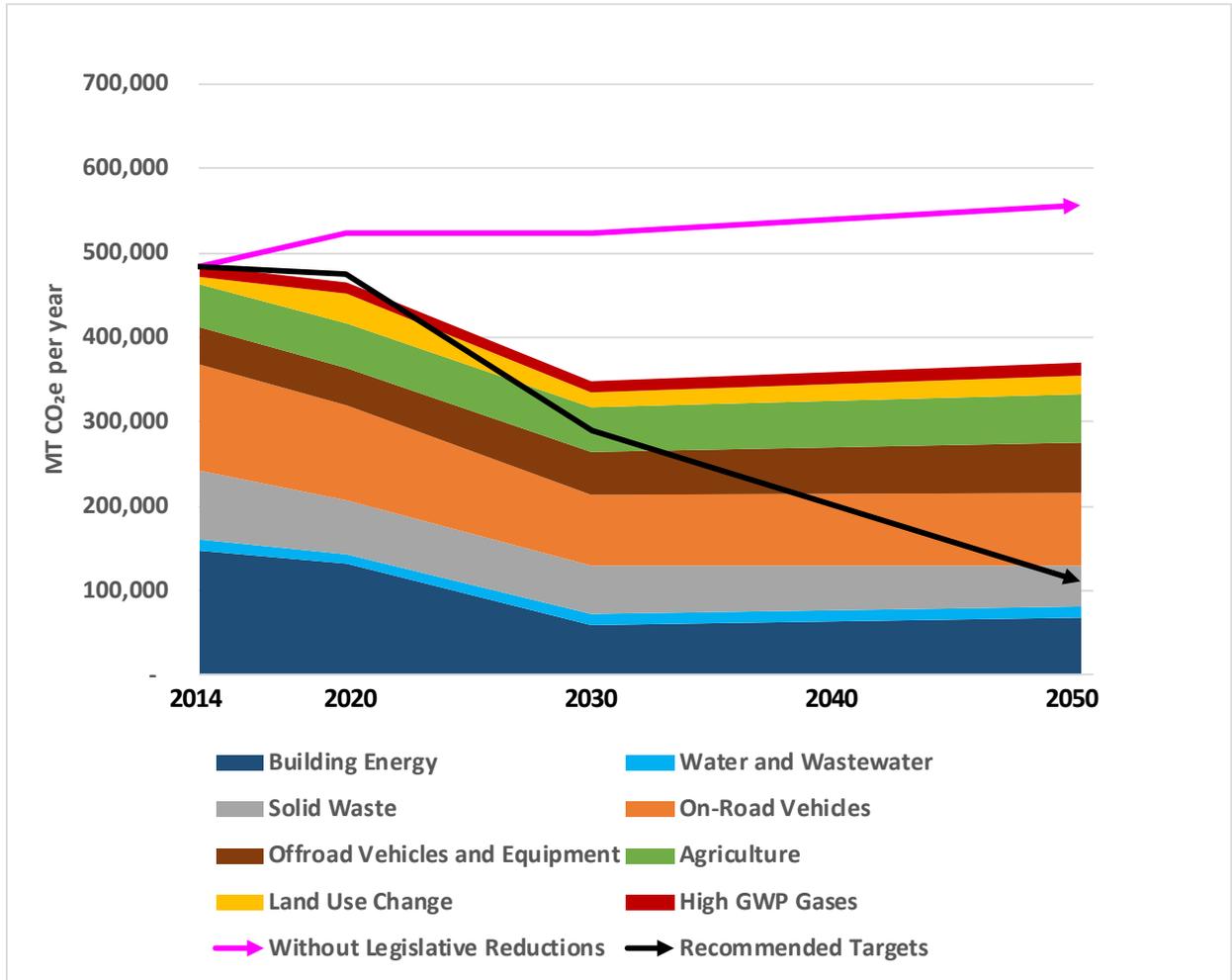
GHG emissions forecasts and reduction targets were identified for 2020, 2030 and 2050, consistent with State targets under AB 32 and SB 32.

- Without any future actions (i.e., “business-as-usual” conditions), GHG emissions are expected to increase by 2020, 2030 and 2050.
- GHG emissions reduction targets for the CAP were established consistent with the most recent guidance provided by the California Air Resources Board (ARB):
  - 2 percent below 2014 levels by 2020;
  - 40 percent below 2014 levels by 2030; and
  - 77 percent below 2014 levels by 2050.
- Legislative actions by State or Federal agencies help to reduce emissions in the future, but not enough to achieve the targets.
- Achieving the 2030 and 2050 targets will require local action to help close the gap between legislative-adjusted emissions forecasts and the emissions limits established by the CAP’s targets.

A breakdown of unincorporated Napa County’s GHG emissions in 2014 is shown below.



Napa County Business as Usual GHG emissions forecasts and targets without implementation of the CAP measures are shown below.



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 percent of the County lies outside of incorporated jurisdictions, and all of this land, with the exception of almost 100,000 acres that are in public ownership, is subject to the land use jurisdiction of the Napa County Board of Supervisors.  
  
 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).
10. **Other agencies whose approval is required (e.g., permits, financing approval, or participation agreement).**  
 None.
11. **Tribal Cultural Resources. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Assembly Bill 52 (AB 52) Public Resources Code section 21080.3.1? If so, has consultation begun?** Because the CAP is within the scope of the 2008 General Plan Update and the program-level EIR prepared for the 2008 General Plan Update adequately describes the project for the purposes of CEQA, the provisions of AB 52 are not applicable.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.



|  | Potentially Significant Impact | Less Than Significant With Mitigation Incorporation | Less Than Significant Impact        | No Impact                           |
|--|--------------------------------|---|-------------------------------------|-------------------------------------|
| I. <b>AESTHETICS.</b> Would the project:   |                                |   |                                     |                                     |
| a) Have a substantial adverse effect on a scenic vista?  | <input type="checkbox"/>       | <input type="checkbox"/>                            | <input type="checkbox"/>            | <input checked="" 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 type="checkbox"/>            | <input checked="" 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 type="checkbox"/>            | <input checked="" type="checkbox"/> |

**Discussion:**

- a. The CAP is a policy -level document that does not include any site-specific designs or proposals nor does it grant any entitlements for development that would have the potential to degrade the aesthetic quality of the environment or to adversely affect visual resources. The CAP does not propose to change existing land use designations or zoning districts, and anticipates that land uses will be consistent with the designations established by the General Plan. Implementation of the CAP would not allow for development beyond that identified in the County's General Plan nor would it change the County's existing Viewshed Protection Program policies within the Zoning Ordinance. The CAP would not adversely affect any identified scenic vistas in the County's General Plan. Therefore, no impacts would occur.
- b. Please refer to discussion a. above. No impacts would occur.
- c. The General Plan Update EIR included a projection of anticipated population, employment, and vineyard development in the unincorporated County from 2005 to 2030. The Climate Action Plan would apply to the period between its adoption with the identification of GHG emissions reduction targets for 2020, 2030, and 2050 and would neither hasten nor impede land use changes anticipated in the General Plan Update EIR. The CAP encourages the preservation of oak woodland as well as the enhancement of riparian lands (refer to GHG reduction measures LU-1 and LU-2) which would reduce less than significant aesthetic impacts identified in the General Plan Update EIR. Although constructing photovoltaic (PV) panels or other alternative energy infrastructure or facilities could affect the visual character of individual properties in the County, existing development standards are adequate to ensure that none of these changes results in a significant environmental impact. 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. (refer to Measures 4.14.1 & 2.) Impacts would be less than significant.
- d. As discussed under a) and c) above, the proposed CAP is a policy-level document that does not include any site-specific designs or proposals, nor does it grant any entitlements for development that would increase daytime or nighttime illumination in the County. Future development projects would be required to be designed and constructed in accordance with the Napa County Zoning Ordinance which contains standards for lighting and building materials that do not produce glare. Although photovoltaic panels are encouraged by the CAP, they are designed to absorb, not reflect, sunlight. Thus, their placement and orientation on individual properties would not adversely affect day or nighttime views in the area. Therefore, implementation of the proposed CAP would create no impact associated with increased light and glare.

**Mitigation Measure(s):** None required.

|  | Potentially Significant Impact | Less Than Significant With Mitigation Incorporation | Less Than Significant Impact | No Impact                           |
|--|--------------------------------|---|------------------------------|-------------------------------------|
| II. <b>AGRICULTURE AND FOREST RESOURCES.</b> <sup>1</sup> Would the project:   |                                |   |                              |                                     |
| a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?  | <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 type="checkbox"/>     | <input checked="" 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"/> |
| 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 type="checkbox"/>     | <input checked="" type="checkbox"/> |

**Discussion:**

a/b/e. The General Plan Update EIR contained an analysis of potential losses of farmland over the life of the General Plan from 2005 to 2030 and contained mitigation to ensure that any impacts would be less than significant. The EIR also included a projection of vineyard development that would occur within the life of the plan estimating that up to 12,500 additional acres could be converted to vineyard by 2030 (and approximately 7,500 acres between 2005 and 2020). Because it was not possible to predict precisely where this vineyard development would occur, the EIR analyzed several different scenarios to assess the range of possible impacts. Some of these scenarios assumed conversion of forest land to non-forest use, and others assumed removal of less carbon-rich vegetation. The proposed CAP uses the General Plan EIR vineyard development scenarios in its analysis of potential changes in carbon sequestration. The CAP is a policy-level document that does not include any site-specific designs or proposals nor does it grant any entitlements for development that would have the potential to degrade the quality of the environment or to adversely affect agricultural or forestry resources. The CAP does not propose to change existing land use designations or zoning districts and anticipates that land uses will be consistent with the designations established by the General Plan. As a policy document, implementation of the CAP would not result in direct conversion of Prime Farmland, Unique Farmland or Farmland of Statewide Importance. GHG reduction measures LU-1 and LU-2 facilitate the preservation of oak woodland as well as the enhancement of riparian lands. Measure LU-1 would strengthen General Plan Policy CON-24 regarding oak woodlands retention which is applicable to all discretionary projects. Accordingly, the Climate Action Plan would reduce the less than significant, significant, and significant and unmitigable impacts identified in the General Plan EIR related to agricultural resources. Mitigation measures 4.1.1 adopted as part of the General Plan would continue to apply. No impacts would occur.

c/d. As stated above, the CAP is a policy-level document that would not result in the direct conversion of forest land. No impacts would occur.

**Mitigation Measure(s):** None required.

<sup>1</sup> "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 Wildlife, 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                           |
|---|--------------------------------|---|-------------------------------------|-------------------------------------|
| III. <b>AIR QUALITY.</b> 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 checked="" type="checkbox"/> | <input 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 checked="" type="checkbox"/> | <input type="checkbox"/>            |
| e) Create objectionable dust or odors affecting a substantial number of people?   | <input type="checkbox"/>       | <input type="checkbox"/>                            | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

**Discussion:**

- a. The CAP is intended to reduce GHG emissions within the unincorporated area of the County to help contribute to global efforts to reduce the effects of climate change by improving energy efficiency in buildings and reducing construction energy use (see GHG reduction measures BE-1 to BE-11). It also includes measures to facilitate the use of renewable energy such as measure BE-7. Also included within the CAP are strategies to reduce the open burning of agricultural biomass and flood debris, support the conversion all stationary diesel or gas powered irrigation pumps to electric pumps, to encourage the use of electric or alternatively fueled agricultural equipment, support the use of Tier 4 final diesel equipment for off-road agricultural equipment, support reduced application of inorganic nitrogen fertilizer, and encourage the use of carbon farming and other sustainable agricultural practices in the County (see GHG reduction measures AG-1 to AG-6). Lastly, the CAP features measures to support alternatives to private vehicle travel for visitors, support for interregional transit solutions, and increasing the availability of electric vehicle charging stations (see GHG reduction measures TR-6, TR-8, and TR-11). In addition to reducing GHGs, each of these measures would help to reduce criteria air pollutants and would not conflict with or obstruct the Bay Area Air Quality Management District's Air Quality Plan. No impacts would occur.
- b. The proposed CAP quantifies emissions of GHG emissions, which are discussed in Section VII below. There would be no increase in other pollutants or violations of air quality standards as a result of the plan and the air quality impacts of development projected during the life of the General Plan (2005-2030) would remain significant and unavoidable. Mitigation measures adopted as policies and action items within the General Plan would continue to apply. (See Mitigation Measures 4.8.1-5.) In addition, future development would be required to comply with General Plan policies related to air quality and with County Code requirements regarding odor, conform to the Bay Area 2005 Ozone Strategy, and meet National Ambient Air Quality Standards (NAAQS) and BAAQMD thresholds during both construction and operation activities. The proposed CAP also contains measures that support energy-conserving programs and encourage development in close proximity to transit. These measures would help reduce adverse effects to air quality through the reduction of fossil fuel consumption and the use of private motor vehicles. Therefore, the proposed CAP would have less than significant impacts associated with contributing substantially to an existing or projected air quality violation, increasing criteria pollutants during both construction and operational activities, and exposing sensitive receptors to substantial pollutant concentrations.
- c. Please refer to discussion b. above. Impacts would be less than significant.
- d. Please refer to discussion b. above. Impacts would be less than significant.
- e. Future development that might be encouraged by CAP measures related to land use densities are not considered to be emission sources that would result in objectionable odors. No impact would occur.

**Mitigation Measures:** None required.

|  | Potentially Significant Impact | Less Than Significant With Mitigation Incorporation | Less Than Significant Impact        | No Impact                           |
|--|--------------------------------|---|-------------------------------------|-------------------------------------|
| <b>IV. BIOLOGICAL RESOURCES.</b> 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 checked="" type="checkbox"/> | <input 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 checked="" type="checkbox"/> | <input 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 checked="" type="checkbox"/> | <input 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 checked="" type="checkbox"/> | <input 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 checked="" type="checkbox"/> | <input 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:**

- a. As discussed in Section II, above, the General Plan EIR contained an analysis of vineyard development and other land use changes over the life of the General Plan. As a result of those changes, the EIR concluded there could be a significant and unavoidable loss of sensitive biotic communities, including oak woodlands. Mitigation measures were adopted as part of the General Plan to address this impact, but were not deemed sufficient to reduce the impact to less than significant. Other biological impacts were considered significant and mitigable. The Climate Action Plan would not change the conclusions of the General Plan EIR's analysis, but would reduce the impact on sensitive biotic communities based upon the implementation of GHG reduction measures LU-1, oak woodland preservation, and LU-2, riparian lands enhancement. Measure LU-3 establishes the framework for a future program to repurpose or otherwise prevent burning of removed trees and other woody material from land use conversions of oak woodlands and coniferous forests. Mitigation measures adopted as part of the General Plan would continue to apply. (See Measures 4.5.1-4 as well as Measures 4.11.2-5.) Impacts would be less than significant.
- b. The proposed CAP does not include any site-specific designs or development proposals, nor does it grant any entitlements for development. Additionally, the proposed CAP does not provide specific details regarding future land use decisions as no course of action associated with the proposed reduction measures has been determined. Future development projects will require compliance with General Plan policies related to biological resources. Therefore, impacts to federally protected wetlands and riparian resources would be less than significant. In the long-run, the CAP is intended to have a net positive effect on riparian areas by including strategies for enhancement such as measure LU-2.
- c. Please refer to discussion b. above. Impacts would be less than significant.
- d. The CAP would not interfere 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. While the CAP does promote renewable energy sources such as solar, it would not result in the construction of wind energy conversion facilities that may interfere with avian migration. Further, the CAP includes a measure which promotes robust native wildlife and habitat areas through active restoration and enhancement of riparian areas and oak woodland preservation. Impacts would be less than significant.
- e. The General Plan and Zoning Ordinance include policies and standards regarding creek and riparian habitat protection as well as

oak tree preservation and protection. Proposed CAP strategies would work in conjunction with these policies and would not change these existing development standards. As discussed above, implementation of measures LU-1 and LU-2 would strengthen the protection of oak woodlands and enhance riparian lands. Therefore, impacts would be less than significant.

- f. The County of Napa is not within the boundaries of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other conservation plan. This condition precludes the possibility of the proposed CAP conflicting with an adopted conservation plan. No impact would occur.

**Mitigation Measures:** None required.

|   | Potentially Significant Impact | Less Than Significant With Mitigation Incorporation | Less Than Significant Impact        | No Impact                |
|---|--------------------------------|---|-------------------------------------|--------------------------|
| V. <b>CULTURAL RESOURCES.</b> 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 checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?                     | <input type="checkbox"/>       | <input type="checkbox"/>                            | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Disturb any human remains, including those interred outside of formal cemeteries?  | <input type="checkbox"/>       | <input type="checkbox"/>                            | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**Discussion:**

a-d. The proposed CAP 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 CAP would itself not cause buildings to be removed or result in sub-surface excavation that might affect buried archaeological resources or human remains. Mitigation measures adopted as part of the General Plan would continue to apply. (See Measures 4.12.1-2.)

Although future development within the County could conflict with undiscovered paleontological and archaeological resources that would be encountered and potentially impacted by future construction activities, compliance with state regulations pertaining to the discovery of archaeological resources would ensure that this impact is less than significant.

The CAP is a policy-level document that does not include any site-specific designs or proposals, nor does it grant any entitlements for development that would have the potential to adversely impact cultural resources. Although the CAP would have no direct impact on cultural resources, future implementation activities could result in ground disturbance during construction that could uncover previously unknown human remains. However, in this event, adherence to state and local regulations would ensure that this impact is less than significant.

**Mitigation Measures:** None required.

|  | Potentially Significant Impact | Less Than Significant With Mitigation Incorporation | Less Than Significant Impact        | No Impact                |
|--|--------------------------------|---|-------------------------------------|--------------------------|
| VI. <b>GEOLOGY AND SOILS.</b> 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"/> |

|  | Potentially Significant Impact | Less Than Significant With Mitigation Incorporation | Less Than Significant Impact        | No Impact                |
|--|--------------------------------|---|-------------------------------------|--------------------------|
| 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 checked="" type="checkbox"/> | <input 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 checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Be located on expansive soil creating substantial risks to life or property? Expansive soil is defined as soil having an expansive index greater than 20, as determined in accordance with ASTM (American Society of Testing and Materials) D 4829. | <input type="checkbox"/>       | <input type="checkbox"/>                            | <input checked="" type="checkbox"/> | <input 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:**

- a. i – iv. The proposed CAP 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 Climate Action Plan itself would not cause or exacerbate hazards. Mitigation measures adopted as part of the General Plan would continue to apply. (See Measures 4.10.1-4.) Impacts would be less than significant.
- b. The CAP is a policy-level document that does not include any site-specific designs or proposals, nor does it grant any entitlements for development that would have the potential to degrade the quality of the environment or to adversely affect geologic resources. As a policy document, the CAP would not result in any direct change in soil erosion. However, future implementation activities could change surface conditions as the result of moving and grading topsoil that could lead to disturbed soils that are more likely to suffer from erosion. All projects that may be built to implement the CAP would be subject to the Napa County Stormwater Ordinance and CBC building code requirements which ensure that projects are developed in a manner that minimizes construction related erosion. Compliance with CBC and County Code requirements would ensure impacts are less than significant.
- c/d. Future development on unstable or expansive soils could create substantial risks to life or property and result in adverse impacts such as on-or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse. Portions of the County are underlain with stiff alluvial clay which is a soil unit with expansion potential. Structures and infrastructure in these areas can be at risk if they are not engineered and constructed pursuant to appropriate building codes. All projects that may be constructed to implement the CAP would be subject to County engineering and CBC building code requirements which would minimize the potential impacts of expansive soil. Impacts would be less than significant.
- e. As mentioned above, the CAP is a policy-level document that does not include any site-specific designs or proposals, nor does it grant any entitlements for waste water disposal systems. Future proposals for such systems would be subject to review and approval by the Division of Environmental Health. Impacts would be less than significant.

**Mitigation Measures:** None required.

| 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:**

a/b. California has identified reductions in the State's GHG emissions as a priority and has adopted and is implementing legislation to address this objective. Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006, requires California to reduce statewide GHG emissions to 1990 levels by 2020. AB 32 directs the California Air Resources Board (CARB) to develop and implement regulations that reduce statewide GHG emissions. The Climate Change Scoping Plan was approved by CARB in December 2008 and outlines the State's plan to achieve the GHG reductions required in AB 32. The Scoping Plan encourages local governments to adopt a reduction goal for municipal operations emissions and to establish similar goals for community emissions that reflect the State commitment to reduce GHGs.

The Napa County General Plan was last updated in June 2008 and includes the following action item:

- Action Item CON CPSP-2: The County shall conduct a GHG emission inventory analysis of all major emission sources in the County by the end of 2008 in a manner consistent with Assembly Bill 32, and then seek reductions such that emissions are equivalent to year 1990 levels by the year 2020. Development of a reduction plan shall include consideration of a "green building" ordinance and other mechanisms that are shown to be effective at reducing emissions. [Implements Policy CON-65]

This proposed CAP implements Action Item CON CPSP-2. Specifically, the CAP:

- Quantifies GHG emissions, both existing and projected, to the end date of the General Plan, resulting from activities within unincorporated Napa County;
- Establishes a level, based on substantial evidence, below which the contribution to GHG from activities covered by the General Plan would not be cumulatively considerable. The quantified emission reduction level in the CAP was determined in consultation with the BAAQMD and Association of Bay Area Governments;
- Identifies and analyzes GHG emissions resulting from specific actions anticipated to occur within unincorporated Napa County;
- Specifies measures, including performance standards, which demonstrate with substantial evidence that if implemented on a project-by-project basis, the specified emissions level would be achieved;
- Establishes a mechanism to monitor the plan's progress toward achieving the level described in item 2 above, and to require amendment if the plan is not achieving the specified levels; and
- Follows the environmental and public review process prior to adoption.

In 2011, the Bay Area Air Quality Management District (BAAQMD) released California Environmental Quality Act (CEQA) Project Screening Criteria (Table 3-1 – Criteria Air Pollutants and Precursors & GHG Screening Level Sizes) and Significance of Thresholds [1,100 metric tons per year (MT) of carbon dioxide and carbon dioxide equivalents (CO<sub>2e</sub>)]. This threshold of significance is appropriate for evaluating projects in Napa County.

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 (approximately 246,557 MTCO<sub>2e</sub>), increases in vehicle miles travelled (approximately 380,459 metric tons), residential growth (43,392 MTCO<sub>2e</sub> and non-residential energy use (162,473 MTCO<sub>2e</sub>). The Final EIR's estimates of GHG emissions were gross and overlapping since emissions associated with population growth, necessarily include emissions associated with vehicle miles travelled and building energy use.

The proposed CAP updates these with the County's efforts to reduce emissions as described above. According to the proposed CAP inventory, unincorporated Napa County emitted a total of 484, 283 MTCO<sub>2</sub>e in 2014. Emissions estimates within the CAP include a legislative adjusted business as usual forecast with legislative reductions of 463,821 MTCO<sub>2</sub>e in 2020, 348,253 MTCO<sub>2</sub>e in 2030, and 369,563 MTCO<sub>2</sub>e in 2050. Implementation of the CAP would result in annual GHG emissions of approximately 417,496 MTCO<sub>2</sub>e in 2020 and 290,306 MTCO<sub>2</sub>e in 2030 consistent with the statewide GHG emissions reduction targets. The CAP would therefore directly and indirectly reduce the County's contribution to GHG. Therefore, the project would not conflict with an applicable plan, policy, or regulation of an agency adopted for the purpose of reducing emissions of GHGs.

**Mitigation Measures:** None required.

|   | Potentially Significant Impact | Less Than Significant With Mitigation Incorporation | Less Than Significant Impact        | No Impact                           |
|---|--------------------------------|---|-------------------------------------|-------------------------------------|
| <b>VIII. HAZARDS AND HAZARDOUS MATERIALS. Would the project:</b>  |                                |   |                                     |                                     |
| 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 checked="" type="checkbox"/> | <input 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 checked="" type="checkbox"/> | <input 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 checked="" type="checkbox"/> | <input 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 checked="" type="checkbox"/> | <input 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 checked="" type="checkbox"/> | <input 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:**

- a. The proposed CAP would not involve or stimulate the use or disposal of hazardous materials. 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.)

The CAP may be implemented by future construction projects that would require use of construction materials, such as paints and solvents that may be hazardous through exposure during routine transport, use, or disposal. However, the construction

activities associated with residential and commercial retrofit and renovation projects recommended by the CAP would not use these materials in large enough quantities to cause adverse effects. Moreover, these construction activities are substantially the same as those that would happen in the absence of the CAP, and there would be no increase in the use of hazardous materials resulting from adoption of CAP policies.

Although unincorporated Napa County contains sites that are listed in the California Department of Toxic Substances Control's EnviroStor database, future development projects will require compliance with General Plan policies related to safety and hazardous materials, as well as County standards regarding hazardous materials and allowed placement of compatible land uses, which are designed to safeguard the public from potential adverse impacts associated with certain land uses including those that are associated with the use, disposal, and transportation of hazardous materials. Therefore, the proposed CAP would create a less than significant hazard to the public or environment regarding the transport, storage, use, and disposal of hazardous materials.

- b. Please refer to discussion a. above. Impacts would be less than significant.
- c. Please refer to discussion a. above. Impacts would be less than significant.
- d. Please refer to discussion a. above. Impacts would be less than significant.
- e. Areas within the unincorporated County are located within the boundaries of the land use compatibility plan for Napa County Airport and Parrett Field and private airports. However, the CAP does not include any policies which would promote incompatible land uses near the airports. Impacts would be less than significant.
- f. Please refer to discussion e. above. Impacts would be less than significant.
- g. The CAP recommends strategies to reduce GHG emissions. It does not include recommendations that would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. No impacts would occur.
- h. As a policy-level document, the CAP would not increase exposure of people and/or structures to a significant loss, injury or death involving wild land fires. Future development would be required to comply with current California Department of Forestry and California Building Code requirements for fire safety. Impacts would be less than significant.

**Mitigation Measure(s):** None required.

|   | Potentially Significant Impact | Less Than Significant With Mitigation Incorporation | Less Than Significant Impact        | No Impact                           |
|---|--------------------------------|---|-------------------------------------|-------------------------------------|
| <b>IX. HYDROLOGY AND WATER QUALITY.</b> 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 type="checkbox"/>            | <input checked="" 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 checked="" type="checkbox"/> | <input 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 checked="" type="checkbox"/> | <input type="checkbox"/>            |

|   | Potentially Significant Impact | Less Than Significant With Mitigation Incorporation | Less Than Significant Impact        | No Impact                           |
|---|--------------------------------|---|-------------------------------------|-------------------------------------|
| 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 checked="" type="checkbox"/> | <input type="checkbox"/>            |
| f) Otherwise substantially degrade water quality?   | <input type="checkbox"/>       | <input type="checkbox"/>                            | <input checked="" type="checkbox"/> | <input 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 checked="" type="checkbox"/> | <input 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 checked="" type="checkbox"/> | <input type="checkbox"/>            |
| j) Inundation by seiche, tsunami, or mudflow?   | <input type="checkbox"/>       | <input type="checkbox"/>                            | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

**Discussion:**

- a. As discussed earlier, the proposed CAP makes use of development assumptions from the General Plan EIR in its inventory of GHG emissions. The CAP would not, however, stimulate or impede development, so the 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. (See Measures 4.11.2-5 & 4.11.9.)

The proposed CAP is a policy-level document that does not include any site-specific designs or proposals, nor does it grant any entitlements for development that would have the potential to degrade the quality of the environment or to adversely affect water quality or hydrology. As a policy document, the CAP would have no direct impact on water quality or hydrology. Future development within the County could result in both construction and operational impacts to water quality and discharge standards. However, the County enforces erosion control ordinances for new construction to prevent sediment from entering creeks and storm drains. Compliance with the County's Stormwater Ordinance would reduce the impacts of future development. Therefore, impacts would be less than significant.

- b. The CAP recommends water conservation measures, such as adopting a new water conservation ordinance for commercial and residential land uses limiting outdoor watering, which would result in reduced demand for water, including potential groundwater. It does not recommend measures that would require additional water from groundwater supplies or that would substantially interfere with groundwater recharge. Therefore, there would be no impact.
- c. The proposed CAP encourages the County to support the construction of affordable housing, especially workforce housing, in Napa County and to support the Napa Valley Transportation Authority (NVTA) and the cities in developing transit oriented development unique to the needs of the Napa region. Although these improvements may indirectly result in slight alterations to drainage patterns, the changes would be minimal and would occur subject to existing federal and state regulations. The CAP does not include any measures which would directly alter drainage patterns or streams. Further, future development projects would be required to comply with the provisions of the County's Stormwater Ordinance. Therefore, the proposed CAP would result in less than significant impacts to drainage and runoff as no development is proposed and future development would be subject to the regulations identified above.
- d. Please refer to discussion c. above. Impacts would be less than significant.
- e. Please refer to discussion c. above. Impacts would be less than significant.
- f. Please refer to discussion c. above. Impacts would be less than significant.
- g. Areas of the unincorporated County are located within the FEMA-designated 100-year flood zone. However, as discussed above, the CAP is a policy-level document that does not include any site-specific designs and does not grant any entitlements for development. Future development projects would be subject to General Plan policies that restrict the placement of any development on land subject to

flooding in a 100-year event. Therefore, the CAP would not place structures in a 100-year flood zone and impacts would be less than significant.

- h. Please refer to discussion g. above. Impacts would be less than significant.
- i. As noted above, the CAP is a policy-level document which would not directly grant any entitlements for development. It does not include any measures which would 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. Impacts would be less than significant.
- j. Because climate changes resulting from greenhouse gas emissions are expected to contribute to an increase in sea level, the CAP would be anticipated to have a beneficial incremental impact on potential impacts from tsunamis and seiches by retarding the rise in sea level through direct reductions in GHG emissions. As a policy-level document, the CAP would have no direct impact on inundation by seiche, tsunami or mudflow.

**Mitigation Measure(s):** None required.

|   | Potentially Significant Impact | Less Than Significant With Mitigation Incorporation | Less Than Significant Impact        | No Impact                           |
|---|--------------------------------|---|-------------------------------------|-------------------------------------|
| <b>X. LAND USE AND PLANNING.</b> Would the project:   |                                |   |                                     |                                     |
| a) Physically divide an established community?  | <input type="checkbox"/>       | <input type="checkbox"/>                            | <input checked="" 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 checked="" type="checkbox"/> | <input 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:**

- a. The CAP is a policy-level document that does not include any site-specific proposals or grant any entitlements for development that would have the potential to physically divide the community or conflict with adopted plans. The CAP does not propose to change existing land use designations or zoning districts and anticipates that land uses will be consistent with the designations established by the General Plan. Future site-specific development proposals would be subject to the appropriate level of environmental review pursuant to CEQA. Without project-specific information, it would be speculative to identify environmental impacts at this time. The CAP would implement a policy and action item identified as mitigation within the General Plan EIR. For these reasons, less than significant land use 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 4.2.1-2).
- b. Please refer to discussion a. above. Impacts would be less than significant.
- c. The County of Napa is not within the boundaries of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other conservation plan. This condition precludes the possibility of the proposed CAP conflicting with an adopted conservation plan. No impact would occur.

**Mitigation Measure(s):** None required.

|  | Potentially Significant Impact | Less Than Significant With Mitigation Incorporation | Less Than Significant Impact | No Impact                           |
|--|--------------------------------|---|------------------------------|-------------------------------------|
| <b>XI. MINERAL RESOURCES.</b> 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"/> |

|   | Potentially Significant Impact | Less Than Significant With Mitigation Incorporation | Less Than Significant Impact | No Impact                           |
|---|--------------------------------|---|------------------------------|-------------------------------------|
| 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:**

a/b. The CAP is consistent with the land uses envisioned in the General Plan and Zoning Ordinance and would not conflict with an adopted specific plan or remove policies that currently protect mineral resources. Future development proposals would be subject to permitting to ensure conformance with the land use designations. The General Plan Update EIR does not identify potentially significant impacts affecting mineral resources and no mitigation measures would apply. No impacts would occur.

**Mitigation Measure(s):** None required.

|   | Potentially Significant Impact | Less Than Significant With Mitigation Incorporation | Less Than Significant Impact        | No Impact                           |
|---|--------------------------------|---|-------------------------------------|-------------------------------------|
| <b>XII. NOISE.</b> 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 type="checkbox"/>            | <input checked="" 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 type="checkbox"/>            | <input checked="" 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 checked="" type="checkbox"/> | <input type="checkbox"/>            |
| 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 checked="" type="checkbox"/> | <input type="checkbox"/>            |

**Discussion:**

- a. The CAP is a policy-level document that does not include any site-specific designs or development proposals, nor does it grant any entitlements for development. Future development projects will be required to comply with General Plan policies related to noise and vibration standards. 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.) Existing code requirements are adequate to ensure that there would be no adverse impacts related to a temporary or permanent increase in noise levels. No impacts would occur.
- b. Please refer to discussion a. above. No impacts would occur.

- c. Please refer to discussion a. above. No impacts would occur.
- d. Please refer to discussion a. above. No impacts would occur.
- e. Areas within the unincorporated County are located within the boundaries of the land use compatibility plan for Napa County Airport and Parrett Field and private airports. However, the CAP does not include any policies which would promote incompatible land uses near the airports. Future development would be required to comply with the policies of the appropriate airport land use compatibility plan. Impacts would be less than significant.
- f. Please refer to discussion e. above. Impacts would be less than significant.

**Mitigation Measure(s):** None required.

|   | Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>With Mitigation<br>Incorporation | Less Than<br>Significant<br>Impact  | No<br>Impact                        |
|---|--------------------------------------|--|-------------------------------------|-------------------------------------|
| <b>XIII. POPULATION AND HOUSING.</b> 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:**

- a. As stated earlier, the proposed CAP would obligate the County and proposed development applicants to implement specific GHG reduction measures to reduce the GHG emissions associated with their projects. None of these measures would result in land use changes or stimulate population or job growth beyond what was anticipated in the General Plan Update EIR. For example, the CAP includes measures to reduce GHG emissions by promoting the retrofitting of existing homes and businesses. Commercial and residential energy efficiency retrofits that may occur as a result of the CAP would update homes and commercial space that already exists in unincorporated Napa County and would not be likely to include additions that make homes or commercial space larger to accommodate more people. The CAP does not propose any extensions of infrastructure, roads, or utilities. 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.)
- b. The CAP encourages energy-efficient retrofits to existing homes and encourages County support of transit-oriented development projects in targeted locations within the incorporated cities within Napa County. While the energy retrofits may cause temporary inconvenience to housing occupants, they would not result in displacement. Future development would likely lead to greater residential development within city commercial corridors and would result in more homes. Accordingly, the proposed CAP would not displace or decrease housing units in the unincorporated County. No impacts would occur.
- c. Please refer to discussion b. above. No impacts would occur.

**Mitigation Measure(s):** None required.

|   | Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>With Mitigation<br>Incorporation | Less Than<br>Significant<br>Impact | No<br>Impact |
|---|--------------------------------------|--|------------------------------------|--------------|
| <b>XIV. PUBLIC SERVICES.</b> Would the project result in: |                                      |  |                                    |              |

|   | Potentially Significant Impact | Less Than Significant With Mitigation Incorporation | Less Than Significant Impact        | No Impact                |
|---|--------------------------------|---|-------------------------------------|--------------------------|
| 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 checked="" type="checkbox"/> | <input type="checkbox"/> |
| Police protection?  | <input type="checkbox"/>       | <input type="checkbox"/>                            | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Schools?  | <input type="checkbox"/>       | <input type="checkbox"/>                            | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Parks?  | <input type="checkbox"/>       | <input type="checkbox"/>                            | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Other public facilities?  | <input type="checkbox"/>       | <input type="checkbox"/>                            | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**Discussion:**

a. The proposed CAP includes measures that are designed to reduce GHG emissions. Policies related to capital improvements to enhance energy efficiency have the potential to compete for limited financial resources that may otherwise be available to pay for operating expenses for fire and police services. However, this potential conflict would likely be minimal because such retrofits would be part of standard facility maintenance plans and all expenditures would be prioritized through the Capital Improvement Program for public service providers to ensure continuation of services.

The CAP does not propose to change existing land use designations or development standards. Future development proposals would be subject to the appropriate level of environmental review pursuant to CEQA, prior to the County taking any action to consider the approval of such projects. That analysis would include an evaluation of the capacity of emergency service providers, public schools, parks, and libraries to serve the new development. Because existing land use designations and regulations are sufficient to ensure compliance with the General Plan, impacts related to an increased demand for public services would be less than significant.

The CAP would not change development projections or the need for services anticipated by the General Plan EIR. 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.)

Mitigation Measure(s): None required.

|  | 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 checked="" type="checkbox"/> | <input 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:**

a. The CAP does not propose changing existing land use designations, development standards or development projections.

Accordingly, implementation of the CAP is not expected to result in substantial population growth and would not result in increased demand for, use of, or physical deterioration of parks and recreational facilities. The CAP does promote alternatives to private vehicle travel for visitors, but no specific bicycle and pedestrian facilities are proposed. Mitigation measures adopted as part of the General Plan would continue to apply. (See Measure 4.13.9.1.) Impacts would be less than significant.

- b. Refer to discussion a. above. Impacts would be less than significant.

**Mitigation Measure(s):** None required.

|  | Potentially Significant Impact | Less Than Significant With Mitigation Incorporation | Less Than Significant Impact        | No Impact                           |
|--|--------------------------------|---|-------------------------------------|-------------------------------------|
| <b>XVI. TRANSPORTATION/TRAFFIC.</b> 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 (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)? | <input type="checkbox"/>       | <input type="checkbox"/>                            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?   | <input type="checkbox"/>       | <input type="checkbox"/>                            | <input checked="" type="checkbox"/> | <input 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 checked="" type="checkbox"/> | <input type="checkbox"/>            |
| e) Result in inadequate emergency access?  | <input type="checkbox"/>       | <input type="checkbox"/>                            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| f) Result in inadequate parking capacity?  | <input type="checkbox"/>       | <input type="checkbox"/>                            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?   | <input type="checkbox"/>       | <input type="checkbox"/>                            | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

**Discussion:**

- a-b. The proposed CAP includes a number of GHG emission reduction measures that the County would use to achieve reductions in automobile traffic, thereby reducing GHG emissions. These measures involve changes to the County's parking standards (parking reduction ordinance revisions), an update to the Transportation System Management Ordinance for employers, and support of actions by the Napa County Valley Transportation Authority (NVTA) such as efforts to allow commuter rail service on the Napa Wine Train right-of-way, increased availability and accessibility of transit information, interregional transit solutions, alternatives to private vehicle use by Napa Valley visitors, increasing the supply of electric vehicle charging stations, and increasing the presence of park and ride facilities near residential centers. Please refer to the Draft CAP for a complete list of on-road transportation related GHG emission reduction measures. Some of these actions may have physical environmental impacts that require site specific environmental review when a specific location and design have been selected, however they are considered to be actions that would reduce rather than increase traffic and congestion. The proposed measures are consistent with the policies contained within the Circulation Element of the County's General Plan, and would not significantly alter impacts identified in the General Plan Update EIR. In addition, mitigation measures identified in that EIR and adopted as part of the General Plan would remain in effect. (See Measures 4.4.1, 4.4.4, 4.9.4, & 4.13.1.1.) Impacts would be less than significant.
- c. No air traffic is proposed and there are no new structures proposed for this project that would interfere with or require alteration of air traffic patterns. No impact would occur.
- d -f. The CAP is a policy-level document that does not include any site-specific designs or proposals, nor does it grant any entitlements for development that would have the potential to degrade the quality of the environment or to adversely affect traffic. The CAP does not proposed to change existing land use designations or zonedistricts and anticipates that land uses will be consistent with the designations established in the General Plan.

Future development projects will require compliance with General Plan policies related to traffic and circulation. In addition, future projects would be subject to requirements in the Zoning Ordinance regarding site design and emergency access. Impacts would be less than significant.

- g. The CAP promotes County support of transit-oriented development and the NVTA efforts described above in support of existing General Plan policies. Future development would be required to comply with General Plan policies related to bicycle access and alternative transportation. As such, the CAP would not conflict with any local policies or ordinances supporting multi modal access and alternative transportation. Impacts would be less than significant.

**Mitigation Measure(s):** None required.

|  | Potentially Significant Impact | Less Than Significant With Mitigation Incorporation | Less Than Significant Impact        | No Impact                |
|--|--------------------------------|---|-------------------------------------|--------------------------|
| <b>XVII. TRIBAL CULTURAL RESOURCES.</b> Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:  |                                |   |                                     |                          |
| a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k); or   | <input type="checkbox"/>       | <input type="checkbox"/>                            | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.   | <input type="checkbox"/>       | <input type="checkbox"/>                            | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Discussion:  |                                |   |                                     |                          |
| a/b. The CAP is a policy-level document that does not include any site-specific designs or proposals, nor does it grant any entitlements for development that would have the potential to adversely impact cultural resources. Although the CAP would have no direct impact on cultural resources, future implementation activities could result in ground disturbance during construction that could uncover previously unknown human remains. However, in this event, adherence to state and local regulations would ensure that this impact is less than significant. |                                |   |                                     |                          |

**Mitigation Measures:** None required.

|  | Potentially Significant Impact | Less Than Significant With Mitigation Incorporation | Less Than Significant Impact        | No Impact                |
|--|--------------------------------|---|-------------------------------------|--------------------------|
| <b>XVIII. UTILITIES AND SERVICE SYSTEMS.</b> Would the project:  |                                |   |                                     |                          |
| a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?  | <input type="checkbox"/>       | <input type="checkbox"/>                            | <input checked="" type="checkbox"/> | <input 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 checked="" type="checkbox"/> | <input 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 checked="" type="checkbox"/> | <input type="checkbox"/> |

|   | Potentially Significant Impact | Less Than Significant With Mitigation Incorporation | Less Than Significant Impact        | No Impact                |
|---|--------------------------------|---|-------------------------------------|--------------------------|
| 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 checked="" type="checkbox"/> | <input 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 checked="" type="checkbox"/> | <input 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:**

- a. The CAP is a policy-level document that does not include any site-specific designs or proposals, nor does it grant any entitlements for development that would have the potential to degrade the quality of the environment or to adversely increase demand for utility or public services. The CAP does not propose to change existing land use designations or zoning districts and envisions that land uses will be consistent with the General Plan. As such, implementation of the CAP is not anticipated to result in additional population growth over that which is permitted under existing land use designations. Future development proposals would be reviewed by the appropriate service agencies as part of the development review process in order to ensure that adequate capacity in all utility and service facilities would be available on time to maintain desired level of service levels for solid waste, wastewater treatment and water supplies. Therefore, impacts associated with a significant increase in demand for utilities and service systems would be less than significant.
- b. The CAP includes measures to reduce the energy required for water conveyance such as revising conservation regulations for landscape design, adopting a new water conservation ordinance for residential and commercial land uses limiting outdoor watering, and requiring water audits for large new commercial and industrial projects and significant expansions of existing facilities. As such, no adverse impacts to utility providers would occur and impacts would be less than significant.
- c. As a policy document, the CAP does not include development proposals, grant entitlements, or propose changing land use designations or development standards in a manner which would directly alter drainage patterns within unincorporated Napa County. Future developments would be subject to Napa County General Plan policies intended to reduce impacts associated with changes in hydrology as well as Stormwater Ordinance requirements associated with storm drain improvements. The County's Stormwater Ordinance establishes administrative procedures, standards for review, and implementation and enforcement procedures for controlling erosion, sedimentation, other runoff, and the disruption of existing drainage and related environmental damage. Compliance with the provisions of the County's Stormwater Ordinance would reduce the impacts of future development on storm drain improvements. Therefore, impacts associated with the construction of new stormwater drainage facilities or the expansion of existing facilities is considered less than significant.
- d. The CAP includes measures to reduce the energy required for water conveyance such as revising conservation regulations for landscape design, adopting a new water conservation ordinance for residential and commercial land uses limiting outdoor watering, and requiring water audits for large new commercial and industrial projects and significant expansions of existing facilities. A net positive impact on the environment would occur and impacts would be less than significant.
- e. Please refer to discussion a. above. Impacts would be less than significant.
- f. Solid waste collection and disposal would be provided by private haulers. The landfills serving the unincorporated County area have permitted capacity to serve future development consistent with development projected under the General Plan. As a policy document, the CAP does not include development proposals, grant entitlements, or propose changing land use designations or development standards in a manner that would directly impact collection and disposal of waste. Impacts would be less than significant.
- g. The CAP includes a measure to meet an 80 percent solid waste diversion target by 2020 exceeding the State's 75 percent waste diversion by five percent. Mitigation measures adopted as part of the General Plan Update would continue to apply. A net positive impact on the environment would occur and impacts would be less than significant.

Mitigation Measure(s): None required.

|  | Potentially Significant Impact | Less Than Significant With Mitigation Incorporation | Less Than Significant Impact        | No Impact                |
|--|--------------------------------|---|-------------------------------------|--------------------------|
| <b>XIX. MANDATORY FINDINGS OF SIGNIFICANCE</b>   |                                |   |                                     |                          |
| 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 checked="" type="checkbox"/> | <input 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 checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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 checked="" type="checkbox"/> | <input type="checkbox"/> |

**Discussion:**

a. The CAP is a policy-level document that does not include any site-specific designs or proposals, nor does it grant any entitlements for development that would have the potential to degrade the quality of the environment or to adversely impact human beings. The CAP does not propose to change existing land use designations or zoning districts, and anticipates that future land uses will be consistent with the General Plan. While the CAP is anticipated to have a beneficial impact, identifying the full extent of the environmental benefits associated with these measures would be speculative at this time without any specific development projects to review.

Should the County determine that new land uses or zoning designations are needed at some point in the future, the County would conduct the appropriate level of environmental review pursuant to CEQA prior to taking any action. Future development projects would require compliance with General Plan policies and other County codes and ordinances intended to protect the environment. The CAP would establish measures designed to reduce GHG emissions within the unincorporated County in compliance with existing federal, state, and local requirements. Therefore, the proposed CAP would result in less than significant impacts to the environment or to human beings.

b. 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 CAP does not alter this analysis and is itself intended to address GHG emissions from all sources within unincorporated Napa County. Potential cumulative impacts would be less than significant.

c. Please refer to discussion a. above. Impacts would be less than significant.

Mitigation Measures: None required.