### NAPA COUNTY PROPOSED LAND USE MAP AMENDMENT (PLUMA) ADDENDUM TO THE GENERAL PLAN UPDATE EIR CERTIFIED JUNE 3, 2008

This Addendum was prepared in accordance with the California Environmental Quality Act (CEQA) and the CEQA Guidelines to analyze a proposed General Plan amendment referred to as the Proposed Land Use Map Amendment (PLUMA). This addendum is based on the programlevel Environmental Impact Report (EIR) for the 2008 Napa County General Plan Update, which was certified on June 3, 2008, and concludes that the proposed project would fall within the scope of the General Plan Update and the previously-certified EIR.<sup>1</sup>

The Napa County General Plan FEIR (SCH #2005102088) was certified in June 2008 by the Napa County Board of Supervisors. Land use map and text changes are now proposed in order to implement Action Item AG/LU-114.1, which calls on the County to adjust the boundaries of areas designated "Urban Residential" and "Rural Residential" on the County's official Land Use Map (General Plan Figure AG/LU-3), by removing agriculturally-zoned land from these areas. The PLUMA project would make these adjustments and would also adjust the boundaries of areas designated "Cities" on the Land Use Map to reflect actual city boundaries and, in the case of the Cities of Napa and American Canyon, to recognize voter-initiated growth boundaries. A more detailed description of the proposed changes is provided below.

In determining whether an Addendum is the appropriate document to analyze the modifications to the project and its approval, State CEQA Guidelines Section 15164 (Addendum to an EIR or Negative Declaration) states:

- (a) The lead agency or a responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.
- (b) An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.
- (c) An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.
- (d) The decision-making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.
- (e) A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's required findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

<sup>&</sup>lt;sup>1</sup> Information and technical analyses from the General Plan Update Final EIR are utilized throughout this Addendum. This document (consisting of the Draft EIR, public comments, responses, and other materials) are available for review at The Napa County Department of Conservation, Development and Planning, 1195 Third Street, Napa, CA 94559.

State CEQA Guidelines Sections 15162 and 15163 set forth the criteria for determining whether a subsequent EIR or supplemental EIR may be prepared in support of further agency action on the project. Under these Guidelines, a subsequent or supplemental EIR shall be prepared if any of the following criteria are met.

- (a) When an EIR has been certified or negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:
  - (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
  - (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
  - (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
    - (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
    - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
    - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
    - (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.
- (b) If changes to a project or its circumstances occur or new information becomes available after adoption of a negative declaration, the lead agency shall prepare a subsequent EIR if required under subdivision (a). Otherwise the lead agency shall determine whether to prepare a subsequent negative declaration, and addendum, or no further documentation.

As demonstrated in the CEQA checklist and environmental analysis provided later in this addendum, the PLUMA project does not meet the criteria for preparing a subsequent or supplemental EIR, and no further environmental review is needed.

### BACKGROUND

Napa County commenced preparation of a comprehensive General Plan Update in August 2005, and after substantial analysis and citizen participation, the General Plan Update was adopted by the Board of Supervisors on June 3, 2008 and the resulting General Plan now includes the State-required elements (Agricultural Preservation and Land Use, Housing, Circulation, Conservation, Recreation and Open Space, and Safety) as well as two additional elements (Community Character and Economic Development).<sup>2</sup>

The environmental effects of the adoption and implementation of the General Plan Update were disclosed and analyzed in the Napa County General Plan Update EIR (State Clearinghouse #2005102088). The Final EIR, which consisted of the Draft EIR, public and agency comments on the Draft, responses to comments, necessary changes to the text of the Draft, and supplemental materials cited in the certification and adoption resolutions, was certified by the Board of Supervisors on June 3, 2008. The Final EIR identified significant environmental effects that would be mitigated through implementation of General Plan policy provisions and mitigation measures identified in the Final EIR, as well as a number of significant environmental effects that were considered significant and unavoidable. Unavoidable impacts were identified in the areas of agriculture, population/housing/employment, traffic, biological resources, noise, air quality, geology and soils, groundwater, historic architecture, and water supply. The County of Napa Board of Supervisors adopted a Statement of Overriding Considerations with the adoption of the General Plan which identified specific benefits that outweighed these significant impacts (Board of Supervisors Resolution No. 08-86).

On April 22, 2008, prior to adoption of the General Plan Update, the Board of Supervisors adopted Resolution 08-64 initiating a General Plan amendment to improve the correlation between the General Plan Land Use Map and underlying zoning. The resolution requested that the planning effort prioritize adjustments to Urban Residential and Rural Residential areas on the Land Use Map that are not contiguous to incorporated cities and lack adequate infrastructure for urban development, and remove agriculturally zoned land from Urban Residential and Rural Residential areas except where specific circumstances, such as an Affordable Housing (:AH) overlay, justifies retention.

The General Plan Land Use Map (**Figure 1**) is a component of the Agricultural Preservation & Land Use Element of the General Plan, which is required by State law to show the general distribution and general location of land uses in the County, including the use of land for housing, agriculture, industry, open space, and other uses (CGC Sec. 65302(a)). The map and the General Plan are policy documents—expressing a long-term vision for the physical development of the County—and are not regulatory. Amendments to the Land Use Map can be adopted by a resolution of the legislative body (the Board of Supervisors) following review under the California Environmental Quality Act (CEQA) and a hearing/recommendation by the Planning Commission, except if Measure J would require approval by the voters (see below). State law allows each local jurisdiction to amend its General Plan no more than four times per year (CGC Sec. 56358(b)).

<sup>&</sup>lt;sup>2</sup> It should be noted that the General Plan Update did not update the Housing Element, which is currently being updated to meet statutory requirements. Also, the Community Character Element includes the required topic of Noise.

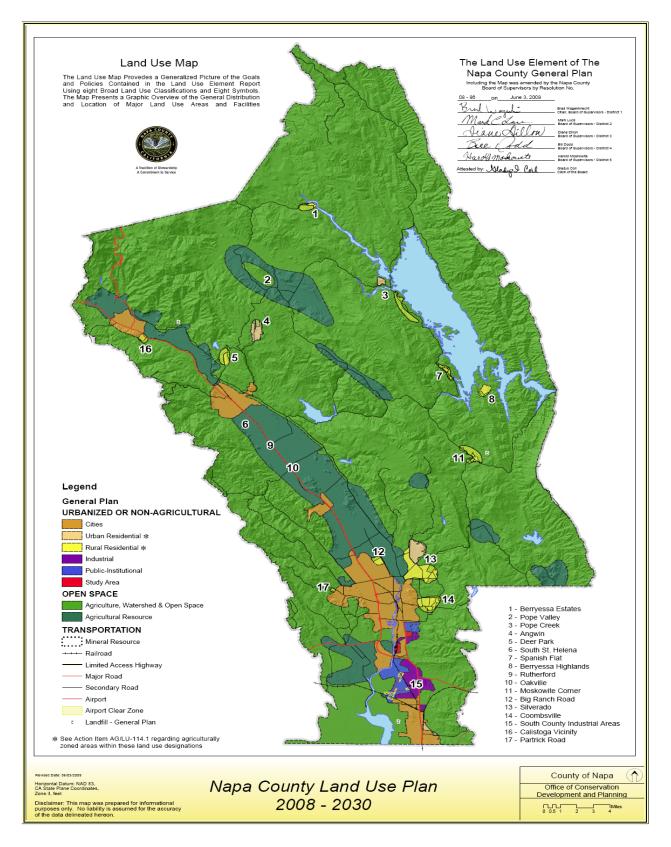


Figure 1: Napa County Land Use Map (Adopted June 2003)

Zoning is a set of regulations which establishes requirements related to the use of buildings, structures and land, and which determines the permitted location, density, and physical form of buildings and structures (CGC Sec. 65850). The County's zoning map is incorporated by reference in County Code Section 18.12.020, and may be amended by ordinance adopted by the legislative body (the Board of Supervisors) following review under CEQA and a hearing/recommendation by the Planning Commission. There is no limit on the number of zoning map or text amendments that may be adopted per year.

State law (CGC Sec. 65860) requires zoning ordinances and general plans to be consistent. In most cases, this is achieved by making the General Plan Land Use Map and the zoning map consistent, however the courts have held that consistency can be achieved even if the maps are not identical, since the policies of a General Plan apply in their totality (i.e. the Land Use Map cannot be viewed in isolation). To this point, the Napa County General Plan (Policy AG/LU-114) states: "In areas where the zoning and the land use designation shown on the Land Use Map are not identical, rezoning is desirable but not mandated, since consistency is achieved by reviewing the stated polices of the General Plan in addition to the Land Use Map."

A good example relates to commercial properties in Oakville and Rutherford; these communities are designated "Agricultural Resource" on the Land Use Map, but contain properties that are zoned for commercial use. General Plan Policy Ag/LU-45 provides for consistency between General Plan and zoning by stating that commercial uses are permitted on commercially zoned sites (illustrated in Figure AG/LU-2).

The PLUMA project is aimed at improving the correlation between the Land Use Map and the zoning map, recognizing that the two maps have different histories and different functions that make it unlikely that they will ever be identical.

Measure J, adopted by the voters in 1990, requires approval from the voters to re-designate areas shown on the Land Use Map as Agricultural Resource (AR) or Agriculture, Watershed and Open Space (AWOS) unless specific exceptions apply. As a result, there are areas of the County zoned for non-agricultural use which have an AR or AWOS designation, but which cannot be re-designated as Urban Residential or Rural Residential (or some other designation) without voter approval. While these areas could conceivably be rezoned for agriculture, they often consist of small parcels or have other physical characteristics which would make it misleading to designate them for agricultural use on the General Plan Land Use Map. In these instances, consistency (between General Plan and zoning) is maintained through General Plan policies such as Policy AG/LU-26, which states that a single family residence is permitted on existing legal parcels.

Measure J is relevant to the current PLUMA planning process in a number of ways. First and foremost, it's important to recognize that Measure J does not restrict the re-designation of properties designated as Urban Residential or Rural Residential on the Land Use Map as of the effective date, thus it is possible to *shrink* these areas without reference to Measure J. On the other hand, it is not possible to *move or expand* the Urban Residential or Rural Residential areas without a vote pursuant to Measure J, unless some narrow exceptions apply. These exceptions include one for properties annexed into cities, and one for properties that are unlikely to be annexed into cities and meet a number of other conditions. Measure P, which will be on the ballot for consideration by Napa County voters on November 4, 2008, references the Land Use Map in effect as of September 28, 2007 and would extend provisions of Measure J until December 31, 2058, requiring approval of the voters to re-designate AR and AWOS lands unless certain exceptions apply. Measure P would add another narrowly defined exception related to affordable housing, and would make no other substantive changes to Measure J.

## THE PLUMA PROJECT: ADDRESSING THE "URBAN BUBBLES"

There are 12 different areas designated as Urban Residential (UR) or Rural Residential (RR) on the Land Use Map. Each is colored either yellow (RR) or flesh tone (UR), and contained within a thick boundary line that was established many years ago with little attention to underlying zoning or parcel lines (hence the informal term "urban bubbles"). Of the 12 areas, seven (Angwin, Berryessa Estates, Berryessa Highlands, Deer Park, Moskowite Corners, Pope Creek, and Spanish Flat) are not contiguous to incorporated cities, and all of these areas have some additional development potential, although in some cases (like Berryessa Estates, Berryessa Highlands, and Pope Creek), this simply means that there are already subdivided parcels that are vacant and could accommodate a single family residence. The Angwin, Moskowite Corners, and Spanish Flat areas have development potential associated with Affordable Housing (:AH) overlay zoning on specific parcels, and—together with Deer Park—also have development potential associated with limited commercial (CL or CN) or planned development (PD) zoning.

All seven of the non-contiguous UR and RR areas are infrastructure-constrained in the sense that they are located some distance from services along twisting rural roads, and have limited access to water and/or waste water disposal systems. Berryessa Estates and Berryessa Highlands have resort improvement districts, which provide water and sewer services within the existing subdivisions, and Spanish Flat and Pope Creek have another district. Some parcels in Angwin and Deer Park are served by the Howell Mountain Mutual Water Company, and some have access to waste water treatment facilities at the hospital and college.

The five UR and RR areas that are contiguous to incorporated cities (Big Ranch Road, Calistoga Vicinity, Coombsville, Partrick Road, and Silverado) have little development potential, except for the RR portion of the Silverado area (i.e. outside of the country club), which includes some :AH overlay sites. Generally, these areas do not have access to municipal services, except for the Silverado country club (UR) area, and they rely on wells and septic systems. Also, the Coombsville area and the Silverado area overlap the MST groundwater basin, an area which has been designated as groundwater deficient.

As shown on the maps which follow, the PLUMA project would remove agriculturally zoned parcels from the UR and RR designations except for the (existing) Berryessa Pines subdivision in Pope Creek, two already developed parcels in Spanish Flat, and parcels with :AH overlay zoning in Spanish Flat and Moskowite Corner. The proposed amendment would also re-designate a portion of the Angwin and Pope Creek areas from UR to RR, and would expand the Rural Residential boundaries of the Berryessa Estates and Berryessa Highlands areas to include PD zoned parcels within the Resort Improvement Districts, relying on the Measure J exception discussed above.

# THE PLUMA PROJECT: REFLECTING ACTUAL CITY BOUNDARIES

Napa County's five incorporated cities/town (Napa, American Canyon, Town of Yountville, St. Helena, and Calistoga) are all depicted on the Land Use Map as orange areas, with thick black boundary lines that do not correspond to actual city boundaries. If these boundary lines were adjusted to reflect actual city boundaries, some parcels would change from Cities (orange) to other designations (e.g. AW, RR) and colors (green, yellow). In other instances, parcels would change from designations such as AW and RR to Cities, and thus would change from green or yellow on the map to orange. In instances where agricultural land (green) would change to Cities (orange), no vote would be required pursuant to Measure J because of the exception provided in Measure J (and Measure P) for lands that are annexed to a city.

As shown on the attached maps, the proposed general plan amendment would change the boundaries of the Cities designation on the Land Use Map to reflect actual city boundaries. Also, the proposal would add the voter-initiated growth boundaries for the Cities of Napa and American Canyon to the Land Use Map with a reference to relevant General Plan Policies (Policies AG/LU-128 and -130). In the case of the City of Napa, parcels within the growth boundary that have an Urban Reserve (:UR) overlay zoning, would be designated as RR.

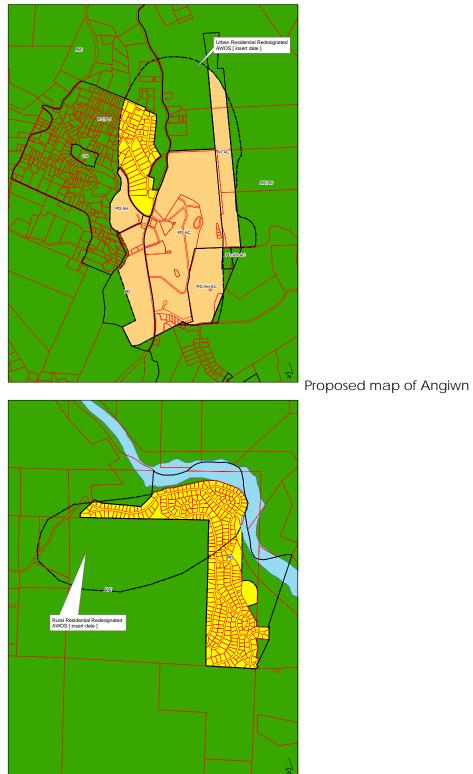
## THE PLUMA PROJECT: LIST OF TEXT AND MAP CHANGES TO THE GENERAL PLAN

The following map and text changes are proposed as part of the PLUMA project, as illustrated on the pages that follow:

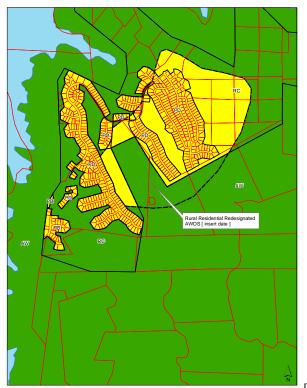
- 1. Update title page
- 2. p. AG/LU-30 revise the map of Angwin
- 3. p. AG/LU-33 revise the map of Berryessa Estates
- 4. p. AG/LU-35 revise the map of Berryessa Highlands
- 5. p. AG/LU-37 revise the map of Big Ranch Road
- 6. p. AG/LU-38 revise the map of Coombsville
- 7. p. AG/LU-40 revise the map of Deer Park
- 8. p. AG/LU-42 revise the maps of Moskowite Corners and Pope Creek
- 9. p. AG/LU-43 revise the map of Spanish Flat
- 10. p. AG/LU-47 revise the map of Silverado
- 11. p. AG/LU-49 revise the map of South County Industrial Areas
- 12. p. AG/LU-63 revise the Land Use Map (Figure AG/LU-3) to include the new "bubbles" and city boundaries as shown in the detail maps provided.
- 13. p. AG/LU-63.5 add a new map of agriculturally designated areas not subject to Measure J

In addition to these changes, County planning staff is recommending a number of minor changes to the General Plan text and maps to update and correct information last amended June 3, 2008. Specifically, the amendment would make the following changes:

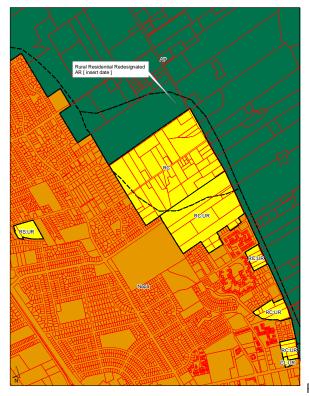
- 14. p. SV-7 omit "AG/LU-119.1 multi-family housing exemption" from the text box (this is a correction).
- 15. p. AG/LU-75 add the word "provided" in Policy AG/LU-130 as follows: "...will support the City's annexation of unincorporated land located within the boundary provided that" (this is a correction).



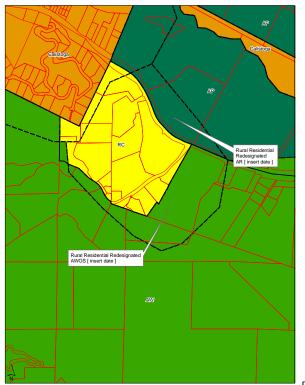
Proposed map of Berryessa Estates



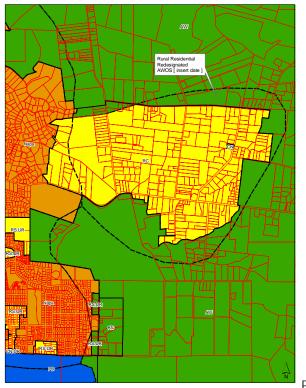
Proposed Map of Berryessa Highlands



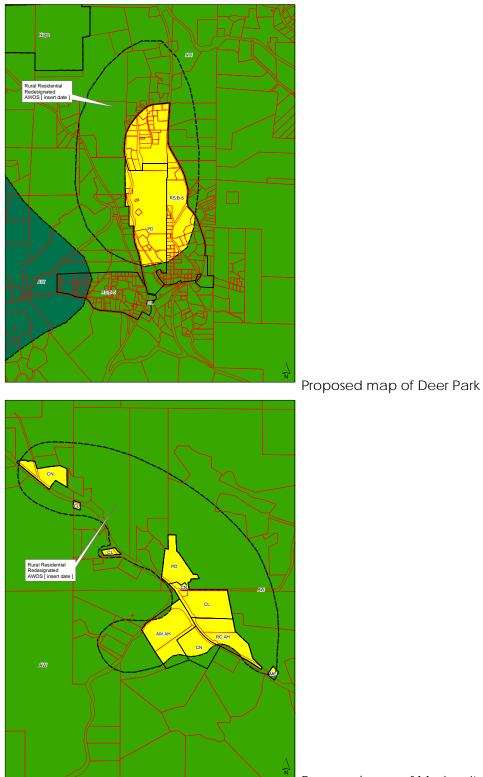
Proposed map of Big Ranch Road



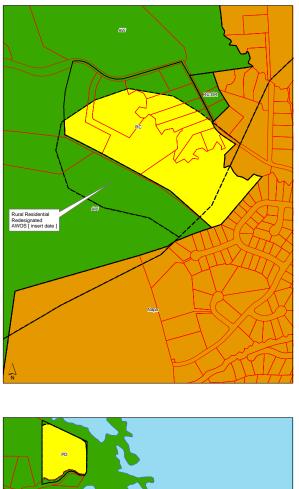
Proposed map of Calistoga Vicinity



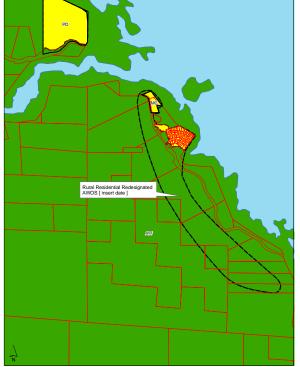
Proposed map of Coombsville



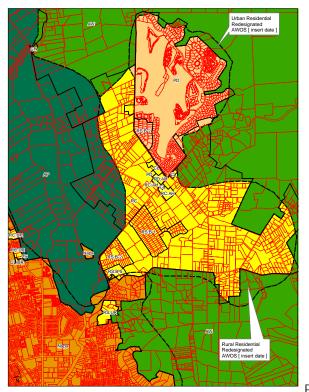
Proposed map of Moskowite Corners



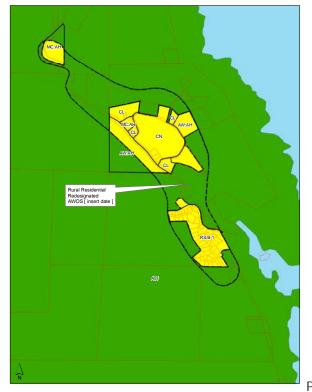
Proposed map of Partick Road



Proposed map of Pope Creek

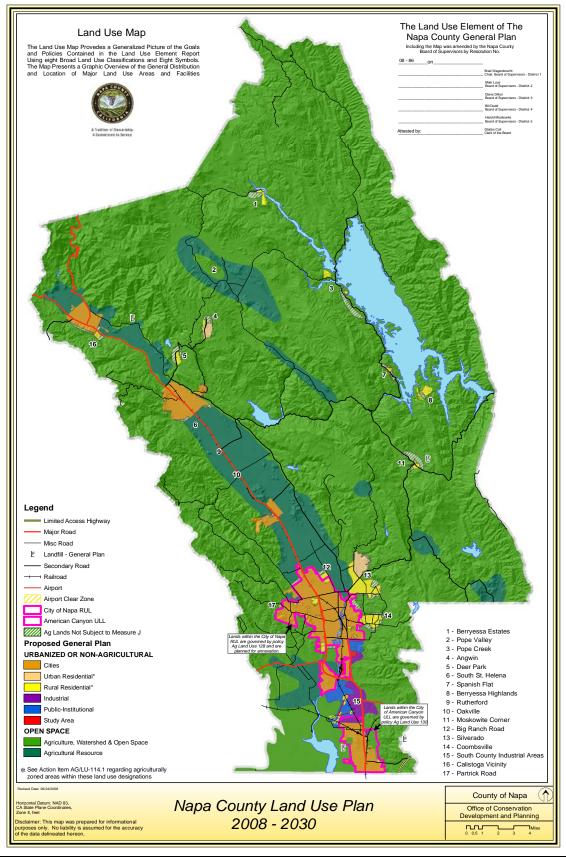


Proposed map of Silverado



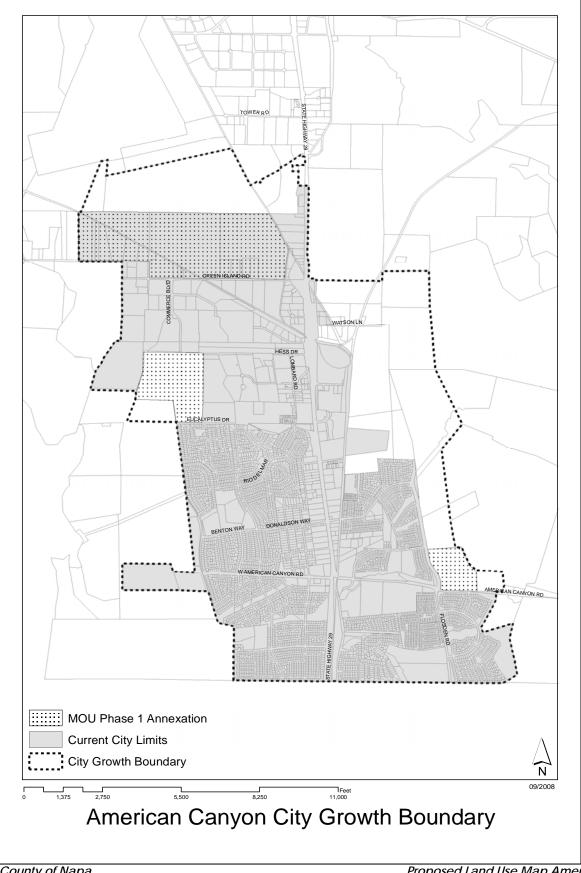
Proposed map of Spanish Flat

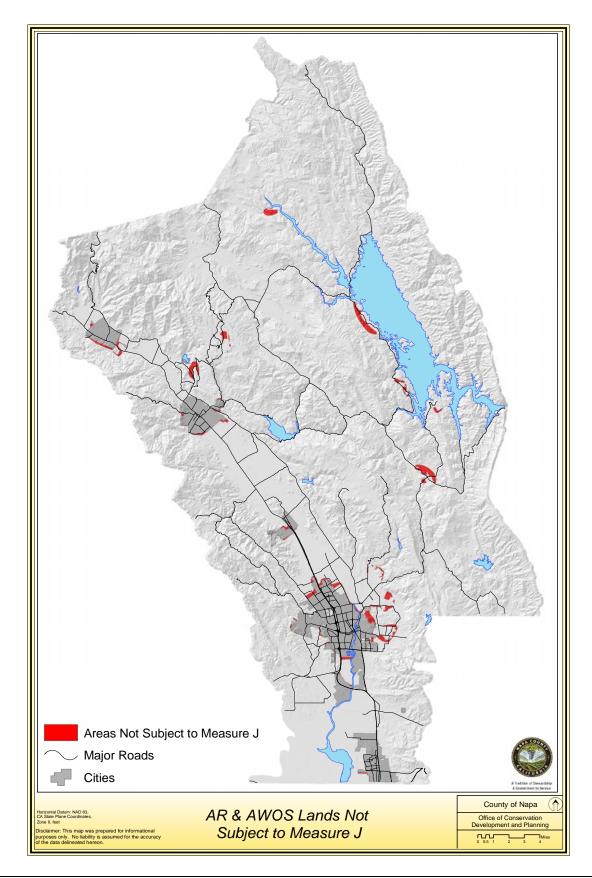
Proposed Land Use Map Changes, including all changes to Urban and Rural Residential areas and Cities



*County of Napa October 1 2008* 

Proposed Land Use Map Amendment Addendum to the General Plan Final EIR





- p. AG/LU-79 revise the American Canyon SOI & Growth Boundary Map (Figure AG/LU-5) to omit the SOI and to show the growth boundary adopted by the Board of Supervisors on July 1, 2008.
- pp. I-2, AG/LU-13, AG/LU-16, AG/LU-17, AG/LU-59, AG/LU-82, and elsewhere if needed for clarity – add reference to the extension of Measure J (1990) known as Measure P and incorporate the text of Measure P if the measure is adopted by the voters on November 4, 2008.

### **ENVIRONMENTAL ANALYSIS**

The analysis below assesses the PLUMA project in relation to the Napa County General Plan Update and the General Plan Update EIR. Pursuant to State CEQA Guidelines Section 15164 and 15162, the analysis focuses on whether any of the conditions that would require preparation of a subsequent EIR exist. Specifically, would the PLUMA project constitute a substantial change to the General Plan Update requiring major revisions to the General Plan Update EIR due to new significant impacts or a substantial increase in the severity of previously identified significant impacts? Also, have there been substantial changes in circumstances or is their new information of substantial importance such that there would be new significant impacts or substantial increases in the severity of previously identified impacts?

A checklist format is used to facilitate cross referencing to the General Plan Update EIR, and provides evidence and analysis to support the conclusion that no additional environmental analysis is needed. Cited source materials are available for review at the Napa County Department of Conservation, Development and Planning, 1195 Third Street, Napa, CA 94559.

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
I.	AESTHETICS. Would the project:				
a)	Have a substantial adverse effect on a scenic vista?			$\boxtimes$	
b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?			$\boxtimes$	
C)	Substantially degrade the existing visual character or quality of the site and its surroundings?			$\boxtimes$	
d)	Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?			$\boxtimes$	

Impact 4.14.1 and 4.14.2 in the General Plan Update EIR (Draft EIR pages 4.14-12 through 4.14-16) addressed the potential degradation of the County's overall visual character as it relates to scenic resources and potential new sources of daytime glare and nighttime lighting. These impacts were identified as significant and mitigable under the General Plan Update, and mitigation measures were adopted in the form of policies in the General Plan, except for Mitigation Measure 4.14.1f, which was not adopted because the associated impact (development on slopes of greater than 15% within the American Canyon growth boundary) was avoided by the General Plan ultimately adopted.

The PLUMA project would adjust boundaries of areas designated Urban Residential and Rural Residential to remove agriculturally-zoned land from these areas, would adjust the Cities designation to reflect actual city boundaries, and would changes the designation of Planned Development zoned parcels in the Berryessa Highlands and Berryessa Estates areas from Agriculture, Watershed and Open Space to Rural Residential. None of these changes would allow for new development, except that existing, legal parcels could continue to be used and developed as permitted under current zoning.

As identified on page 4.14-14 and 4.14-16 of the Draft EIR, implementation of the mitigation measures would ensure that County designated scenic ridgelines and roadways retain their existing visual character, and that views and the visual character of the County are not substantially affected. Implementation of the mitigation measures would also ensure that subsequent development under the General Plan would include design features to avoid and minimize nighttime lighting and daytime glare impacts. Implementation of these mitigation measures would reduce impacts to less than significant. The minor changes to the American Canyon growth boundary included in the PLUMA project are intended to ensure that the County's map conforms exactly with that agreed to by the City and County, and would not exceed the 15% slope line. Thus, no new significant impacts would occur, and there would be no increase in severity of an impact previously identified.

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
II.	AGRICULTURE RESOURCES. In determining significant environmental effects, lead age Land Evaluation and Site Assessment Model of Conservation as an optional model to farmland. Would the project:	encies mag I (1997), pre	y refer to the epared by the	California California D	Agricultural Department
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?				
b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?			$\boxtimes$	
C)	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?			$\boxtimes$	

Impacts on agricultural resources were addressed on Draft EIR pages 4.1-22 through 4.1-31, which considered whether the General Plan Update would result in or permit conversion of State designated important farmland, loss of County-designated agricultural land, agricultural/urban interface conflicts, or conflicts with agricultural zoning and Williamson Act contracts. The EIR concluded that the General Plan would have a significant unavoidable impact due to the conversion of County-designated agricultural land despite adopted mitigation measures if the American Canyon growth boundary was adopted and subsequent actions result in the annexation of agricultural land for urban development. The EIR also concluded that the General Plan would not preclude future conflicts with agricultural zoning because it left agriculturally-zoned areas intact within Urban and Rural Residential designations. This was also identified as a significant and unavoidable impact.

The PLUMA project would reduce one of the previously-identified significant and unavoidable impacts to a level of less than significant by removing the substantial majority of agriculturallyzoned parcels from the Urban and Rural Residential designation. In total, over 2,000 acres of land designated for Urban or Rural Residential development would be instead designated as either Agricultural Reserve (AR) or Agriculture, Watershed and Open Space (AWOS). Remaining agriculturally-zoned parcels 'at risk' would include only those parcels already endowed with an affordable housing overlay (i.e. they are intended for affordable housing development) and parcels in the Pope Creek and Spanish Flat areas that are already fully developed.

The PLUMA would also include Planned Development zoned lands within the "Rural Residential" designation for Berryessa Highlands and Berryessa Estates, resulting in re-designation of approximately 240 acres of County-designated agricultural land to Rural Residential. While the re-designation 240 acres in the Berryessa area could be considered a significant impact in some

contexts, in this case it would be more than off-set by the additional lands added to the agricultural designations. Also, the Planned Development zoned areas are already zoned and subdivided for residential development. Thus, these areas would continue to build-out as urbanized areas regardless of their map designation, and the change from AWOS to RR would be a paper change with no real effect on the ground. In addition, the change could only occur if the Board of Supervisors makes findings consistent with Measure J, including findings that the map change is "compatible with agricultural uses, does not interfere with accepted agricultural practices, and does not adversely affect the stability of land use patterns in the area" and that "the land proposed for re-designation has not been used for agricultural purposes in the past 2 years and is unusable for agriculture due to its topography, drainage, flooding, adverse soil conditions or other physical reasons."

Changes to the American Canyon growth boundary included in the PLUMA are minor adjustments to reflect the City-County agreement and would not noticeably increase or decrease agricultural lands within the boundary, resulting in no change to the significant impact identified in the General Plan Update EIR. Changes to agricultural designations adjacent to cities would also result in no significant impact, since the effect would be to reflect actual jurisdictional boundaries, not to allow or encourage development of agricultural land. Overall, the result of the PLUMA would be to increase lands designated for agricultural use by the County. No new significant impacts would occur (as noted above, one would be eliminated), and no identified significant impact would increase in severity.

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
III.	<b>AIR QUALITY.</b> Where available, the signification quality management or air pollution cont following determinations. Would the project:	rol district		J .	
a)	Conflict with or obstruct implementation of the applicable air quality plan?				$\boxtimes$
b)	Violate any air quality standard or contribute substantially to an existing or projected air quality violation?				$\boxtimes$
C)	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?				
d)	Expose sensitive receptors to substantial pollutant concentrations?				$\square$
e)	Create objectionable odors affecting a substantial number of people?				$\boxtimes$

Air quality impacts were addressed on Draft EIR pages 4.8-18 through 4.8-38, including consistency with air quality regulations, conflicts with particulate matter attainment efforts, short term emissions from grading and construction, odor, exposure to toxic air contaminants, carbon monoxide concentrations along roadways, and potential increase in long-term atmospheric greenhouse gas emissions. (Also see Final EIR pages 4.0-56 through -58 and 2.0-24 through -27.) Air quality impacts were found to be significant and unavoidable despite adopted mitigation due to projected increases in air emissions, including particulates, toxic air contaminants, and green house gases.

The PLUMA project would not affect air quality impacts because the map and text changes propose would not allow or encourage more development or change the extent of development anticipated and analyzed in the General Plan Update EIR. Thus no new air quality impacts would occur, and the unavoidable impacts identified in the EIR would not be made any more severe

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
IV.	BIOLOGICAL RESOURCES. Would the project	:			
a)	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				
b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				
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 wetlands, etc.), through direct removal, filling, hydrological interruption or other means?				
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?				

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				
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?				

The potential for disturbance or loss of special status plant and animal species (Impact 4.5.1) was addressed on Draft EIR pages 4.5-60 through 4.5-67, which identified a series of mitigation measures to lessen the level of impacts that were later adopted as policies in the General Plan. The analysis did not make reference to the General Plan Land Use Map, and generally addressed possible urban/rural development within areas designated *and zoned* for development, as well as the projected development of 10,000 to 12,500 acres of vineyards before the year 2030. The proposed changes in land use designations proposed by the PLUMA would not increase or redirect projected development (residential, non residential, or vineyard) and there would be no changes to the impacts identified or the mitigations adopted.

The loss of sensitive biotic communities (Impact 4.5.2) was addressed on Draft EIR pages 4.5-68 through 4.5-70 and mitigation was adopted to address the impacts identified. However, the potential for cumulative losses to sensitive biotic communities and oak woodlands by the year 2030 was considered significant and unavoidable. The proposed changes in land use designations proposed by the PLUMA would neither increase nor decrease the severity of the significant impact identified, since it would not change the amount or location of development projected to occur.

Draft EIR pages 4.5-70 through 4.5-73 addressed impacts related to the loss of wildlife movement and plant dispersal opportunities, and conflict with biological resource plans, ordinances, or policies. Pages 4.6-22 through 4.6-34 addressed impacts to fisheries from sedimentation, other water quality and hydrologic impacts to fisheries, groundwater interactions with surface water flows, direct impacts to habitat, and interference with movement or migratory corridors. All of the identified impacts were reduced to less than significant with adoption of mitigation in the form of General Plan policies. The proposed changes in land use designations proposed by the PLUMA would neither increase nor decrease the severity of the significant impact identified, since it would not change the amount or location of development projected to occur.

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
V.	CULTURAL RESOURCES. Would the project:				
a)	Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?			$\boxtimes$	
b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?			$\boxtimes$	
C)	Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?			$\boxtimes$	
d)	Disturb any human remains, including those interred outside of formal cemeteries?			$\boxtimes$	

Draft EIR pages 4.12-17 through 4.12-19 addressed impacts to Archaeological – Prehistoric and Historic – Resources, Human Remains, and Paleontological Resources. Mitigation measures were identified and adopted as policies in the General Plan to address these issues, however the potential impact to historic architectural resources was found to be significant and unavoidable, because of the potential that resources could be lost due to future development projects or "demolition by neglect."

Areas proposed for redesignation with the PLUMA are not known to contain archaeological, paleontological, or historic architectural resources of significant, although such resources could exist. Mitigation measures adopted as a result of the General Plan EIR would apply to any development in the affected areas, however, and the PLUMA would not increase or redirect projected growth. Therefore, the PLUMA would not increase the severity of the significant impact identified in the EIR, or result in new significant impacts.

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
VI.	GEOLOGY AND SOILS. Would the project:				
a)	Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death, involving:				
	i) Rupture of a known earthquake fault, as delineated on the most recent Alquist- Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				
	ii) Strong seismic ground shaking?			$\boxtimes$	
	iii) Seismic-related ground failure, including liquefaction?			$\boxtimes$	
	iv) Landslides?			$\boxtimes$	
b)	Result in substantial soil erosion or the loss of topsoil?			$\boxtimes$	
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?			$\boxtimes$	
d)	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?				
e)	Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?				

Draft EIR pages 4.10-25 through -40 addresses impacts related to seismic ground shaking, seismic related ground failure, tsunamis and seiches, landslides, subsidence and settling, expansive soils, septic system operation, and mineral resources. Some of the impacts were significant and mitigable, with mitigation measures included as policies in the General Plan. However others were identified as significant and unmitigable, primarily because the development (residential and non-residential) projected to occur under the General Plan would expose more people to significant geologic hazards related to seismicity and hazardous soil conditions. The PLUMA amendments would not affect geological resources or expose more people to geologic hazards than projected in the General Plan EIR. The PLUMA would not allow more urban/rural

development, or alter the location of the development expected to occur. There are also no changes circumstances or new information that would render the identified impacts more severe than originally indicated.

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
VII.	HAZARDS AND HAZARDOUS MATERIALS. Woul	d the proje	ct:		
a)	Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials?			$\boxtimes$	
b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?				
C)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school?			$\boxtimes$	
d)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?				
e)	For a project located within an airport land use plan area or, where such a plan has not been adopted, within two miles of a public airport or a public use airport, would the project result in a safety hazard for people residing or working in the project area?				
f)	For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?				
g)	Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?				
h)	Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?				

Draft EIR pages 4.9-27 through 4.9-33 address impacts related to the release and exposure to hazardous materials, airport hazards, interference with an adopted emergency response or evacuation plan, and wildland fire. (Also see Final EIR pages 4.0-58 and -59). These impacts were determined to be less than significant or significant and mitigable with measures that have been adopted as policies in the General Plan. The PLUMA would adjust map designations, but would not change the location or increase the density of development anticipated in the General Plan EIR, so it would not change any of the EIR's conclusions related to hazardous materials.

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
VII	. HYDROLOGY AND WATER QUALITY. Would the	project:			
a)	Violate any water quality standards or waste discharge requirements?			$\boxtimes$	
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)?				
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?				
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 that would result in flooding on- or off-site?				
e)	Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?			$\boxtimes$	
f)	Otherwise substantially degrade water quality?			$\boxtimes$	
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?			$\boxtimes$	

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
h)	Place within a 100-year flood hazard area structures that would impede or redirect flood flows?			$\boxtimes$	
i)	Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of a failure of a levee or dam?				
j)	Inundation by seiche, tsunami or mudflow?			$\boxtimes$	

Draft EIR pages 4.11-44 through -75 discusses impacts related to nonpoint source pollution from urban runoff, construction-related soil erosion and sedimentation, agricultural and resource uses, water quality impacts associated with proposed ministerial process for vineyard development projects, groundwater level decline and overdraft, well competition and adverse well interference, changes to drainage patterns leading to increased runoff and streambank erosion, changes to drainage patterns leading to increased runoff and hillside erosion, flood risk from drainage system alteration, 100-year flood hazards areas, new vineyard development and 100-year flooding. (Also see Final EIR pages 4.0-63 through -68). The analysis concluded that all impacts could be mitigated to a level of less than significant with measures that were adopted as policies in the General Plan, except for a potentially significant impact related to possible declines in groundwater levels. This impact was found to be unavoidable largely because there is uncertainty about groundwater supplies in some areas of the County.

The PLUMA project would neither increase or decrease the consumption of groundwater from what was analyzed in the General Plan EIR, because it would not increase or redirect growth that was projected to occur. For this reason, the PLUMA would not result in new water-related impacts or increase the severity of identified impacts. There are also no changed circumstances or new information that meets the standards for requiring further environmental review under CEQA Guidelines 15162.

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
IX.	LAND USE AND PLANNING. Would the project:				
a)	Physically divide an established community?				$\boxtimes$
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?				
c)	Conflict with any applicable habitat conservation plan or natural community conservation plan?				$\boxtimes$

Draft EIR pages 4.2-19 through -25 addressed impacts related to the division of established communities, land use conflicts and conflicts with relevant land use plans, policies or regulations. (Also see Final EIR pages 4.0-11 through -20.) The analysis determined that all potential impacts were either less than significant or could be reduced to that level by mitigation measures that were subsequently adopted as policies in the General Plan.

The PLUMA would remove agriculturally-zoned land from areas designated as Urban Residential or Rural Residential on the Land Use Map, improving the correlation between the General Plan map and the zoning map. The PLUMA would also change some parcels from "Urban Residential" to "Rural Residential," and include some Planned Development zoned lands within the "Rural Residential" designation in the Berryessa Highlands and Berryessa Estates areas. Finally, the PLUMA would adjust boundaries of areas designated "Cities" to reflect actual city boundaries, and make a number of minor text and map corrections.

The net effect of these changes would be to improve the Land Use Map to better reflect existing development patterns and existing zoning and city limits. Only one parcel in the Pope Creek area would actually lose development potential because of the changes; in all other cases, the changes would simply mean that property owners seeking rezoning from agriculture to some other designation would first need to obtain a General Plan amendment (or annexation, if they are adjacent to a city). Parcels within the voter-initiated growth boundaries of Napa and American Canyon could be annexed and/or developed consistent with the notes added to the Land Use Map and applicable policy language already included within the Plan.

No new parcels and no new development potential would be created with the proposed changes, and there would be no substantive change to existing City boundaries and growth limits. For these reasons, the PLUMA would not result in new significant impacts and would not increase the severity of impacts previously identified.

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Χ.	MINERAL RESOURCES. Would the project:				
a)	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?			$\boxtimes$	
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?				

(See Section VI, Geology and Soils for impacts related to Mineral Resources.)

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XI.	NOISE. Would the project result in:				
a)	Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance or of applicable standards of other agencies?			$\boxtimes$	
b)	Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?			$\boxtimes$	
c)	A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?			$\boxtimes$	
d)	A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?			$\boxtimes$	
e)	For a project located within an airport land use plan area or, where such a plan has not been adopted, within two miles of a public airport or a public use airport, would the project expose people residing or working in the project area to excessive noise levels?				
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?				

Draft EIR pages 4.7-24 through -38 address impacts related to noise and land use compatibility, new development exposure to groundborne vibration, project generated traffic noise volume increases, roadway improvement impacts to noise-sensitive uses, project generated non-transportation noise sources, project generated construction noise, noise and land use compatibility (aircraft). Also see Final EIR page 4.0-56). The analysis concluded that all noise and vibration-related impacts could be reduced to a level of less than significant with mitigation measures that were subsequently adopted as policies in the General Plan except for noise related to cumulative increases in traffic. The potential exposure to cumulative traffic noise was considered a significant and unmitigable.

The PLUMA project would not affect noise and vibration impacts because the map and text changes propose would not allow or encourage more development or change the extent of development anticipated and analyzed in the General Plan Update EIR. Thus no new noise-related impacts would occur, and the unavoidable impact identified in the EIR would not be made any more severe

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XII	POPULATION AND HOUSING. Would the pro-	ject:			
a)	Induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?				
b)	Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?			$\boxtimes$	
C)	Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?			$\boxtimes$	

Draft EIR pages 4.3-11 through -18 addressed impacts related to population, housing and employment increases, jobs-housing balance, and displacement of persons or housing. All of these impacts were found to be less than significant because of changes or modifications included in the General Plan.

The PLUMA project would not allow or encourage more development or change the location of development anticipated and analyzed in the General Plan Update EIR. Thus, there would be no new significant impact related to population growth or displacement.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. PUBLIC SERVICES. Would the project result associated with the provision of new or physically altered governmental facil significant environmental impacts, in order to times or other performance objectives for any	cally altered ities, the co maintain ac	government onstruction of ceptable se	tal facilities which co rvice ratios	, need for uld cause
a) Fire protection?			$\boxtimes$	
b) Police protection?			$\boxtimes$	
c) Schools?			$\boxtimes$	
d) Parks?			$\boxtimes$	
e) Other public facilities?			$\boxtimes$	

Draft EIR pages 4.13-40 through -80 addressed impacts related to fire protection, law enforcement, water supply, wastewater service, solid waste, public schools, parks and recreation, electric service, and natural gas service. All of the impacts were found to be less than significant, or were mitigated to that level by measures adopted as part of the General Plan. Those same measures would apply to any future development occurring in areas of the unincorporated County affected by the PLUMA, and no new development potential would be created.

The proposed General Plan amendment would also adjust the boundaries of areas designated "Cities" on the Land Use Map to reflect actual city boundaries and, in the case of the Cities of Napa and American Canyon, would recognize voter-initiated growth boundaries. No zoning changes are proposed, and the proposal is not expected to affect the use of property or permitted development potential, except that it would reduce the development potential of one parcel in the Pope Creek area that is proposed for re-designation from UR to RR.

For these reasons, the PLUMA project would not alter conclusions of the General Plan EIR regarding the provision of services, and no further environmental review is necessary.

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV	. RECREATION.				
a)	Would the project 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?				
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?				

(See Section XIII, Public Services for impacts related to Recreation.)

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XV	. TRANSPORTATION/TRAFFIC. Would the project				
a)	Cause an increase in traffic that 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)?				
b)	Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?				
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?				
d)	Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				
e) f)	Result in inadequate emergency access? Result in inadequate parking capacity?			$\boxtimes$	
,	Result in inadequate emergency access?				

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<ul> <li>g) Conflict with adopted policies, plans or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?</li> </ul>				

Draft EIR pages 4.4-31 through -57 address impacts related to travel demand, traffic congestion, roadway safety and emergency access, conflicts with alternative transportation policies and programs, and demand for parking facilities. The analysis assesses road network improvements included in the General Plan, including widening of Jamieson Canyon from two to four lanes and associated improvements at SR 29 and Airport Boulevard (i.e., "the interchange") and SR 29 and SR 221 ('the flyover"), as well as widening of SR 29 from four lanes to six lanes from SR 37 to SR 12, extension of Flosden/Newell from its current terminus to Green Island Road, completion of Devlin Road on the other side of SR 29. The EIR concludes that local and regional traffic growth that is expected to occur by 2030 would increase PM peak hour vehicle trips by between 21,000 and 23,000 trips (an increase of between 37% and 39%) and would result in 36 to 39 roadway segments operating with a deficient level of service. This impact is considered significant and unavoidable.

The PLUMA would not affect transportation and circulation impacts because the map and text changes proposed would not change land use development patterns or accommodate development not anticipated in the General Plan EIR. In fact, the map changes would mean that the General Plan Land Use Map would better reflect existing development patterns, improving the correlation between the Land Use Map and the Circulation Map contained in the Circulation Element of the General Plan. There would be no new significant impact with PLUMA, and the previously-identified significant impact would not be made more severe. Also, there are no changed circumstances or new information that meet the standard for requiring further environmental review under CEQA Guidelines Section 15162.

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XV	I. UTILITIES AND SERVICE SYSTEMS. Would the pro	ject:			
a)	Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?			$\boxtimes$	
b)	Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
C)	Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				
d)	Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?			$\boxtimes$	
e)	Result in a determination by the wastewater treatment provider that 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?			$\boxtimes$	
f)	Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?			$\boxtimes$	
g)	Comply with federal, state and local statutes and regulations related to solid waste?			$\boxtimes$	

(See Section XIII, Public Services for impacts related to Utilities.)

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wild-life population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of rare or endangered plants or animals, or eliminate important examples of the major periods of California history or prehistory?				

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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.				
C)	Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?			$\boxtimes$	

The California Environmental Quality Act (CEQA) requires local agencies to analyze the potential physical environmental effects of proposed actions, to adopt mitigation measures reducing the severity of impacts determined to be significant, and to consider alternatives that avoid those impacts. The EIR prepared for the 2008 General Plan Update analyzed the potential impacts of the General Plan, including its goals, policies, and implementation actions at a programmatic (i.e. general) level of detail. Pursuant to State CEQA Guidelines Section 15168(c)(2), a program EIR may be relied upon for later activities if the lead agency determines that no new effects could occur, that effects identified would be no more severe, and that no new mitigation measures would be required as a result of the later activity.

Based on the above analysis, County staff has concluded that the proposed PLUMA falls within the scope of the project analyzed in the program-level EIR prepared for the General Plan Update and certified on June 3, 2008. The PLUMA would not result in any new impacts that were not identified in the program EIR, would eliminate one significant impact related to Countydesignated agricultural land, and would not substantially increase the severity of the significant impacts identified related to topics such as traffic congestion, groundwater use, geologic hazards, etc. No new mitigation measures would be required.

Nonetheless, some of the development that occurs within areas affected by the PLUMA will be subject to future environmental analysis at the time of implementation. For example, the County will conduct project-specific environmental review of any discretionary development proposals advanced within Urban and Rural Residential areas. Also, either a City or LAFCO will conduct environmental review(s) prior to taking actions related to urban growth boundaries or annexations.

#### REFERENCES

County of Napa. 2008. Napa County General Plan. Napa County, CA. June 2008.

- County of Napa. 2008. Napa County General Plan Final EIR (SCH #2005102088). Napa County, CA. June 2008.
- County of Napa. 2007. Napa County General Plan Draft EIR. (SCH #2005102088). Napa County, CA. February 16, 2007.

County of Napa. 2008. Proposed Land Use Map Amendment (PLUMA). July 8, 2008 Workbook.

All referenced materials are available for review during normal business hours at the Napa County Department of Conservation, Development and Planning, 1195 Third Street, Napa, 94559.