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To: Napa County Planning Commission Heather Phillips, Chair	From: Donald Barrella, Planner III
Date: December 29, 2014	Re: Syar Napa Quarry Surface Mining Permit P08-00337 General Plan Consistency Analysis

**I. PURPOSE:**

On January 7, 2015, the Commission will consider a resolution certifying a Final Environmental Impact Report (FEIR) for the Syar Napa Quarry expansion project and action on the associated Surface Mining Permit (SMP) to allow an expansion to the Syar Napa Quarry including an increase in production. Prior to taking this action, the Commission must consider whether the Project is consistent with the Napa County General Plan.

**II. BACKGROUND:**

The Syar Napa Quarry Site is located in unincorporated Napa County, approximately two miles southeast of downtown Napa. The site currently contains mining activities and operations conducted by Syar Industries Inc., and has General Plan designations of Industrial (I) and Agricultural, Watershed and Open Space (AWOS). Additionally, a majority of the site is designated as a Mineral Resource area within the General Plan. A review of Syar’s proposed project consistency with the Napa County General Plan with implementation of the Reduced Production Alternative identified in the project EIR is provided below.

The Syar Napa Quarry Site spans two zoning designations, Industrial and Agricultural Watershed. The intent of the Industrial designation is to provide an environment exclusively for and conducive to the development and protection of a variety of industrial uses such as administrative facilities, research institutions, and specialized manufacturing organizations (Napa County Code Section 18.36.010.). The intent of the Agricultural Watershed designation is to provide in those areas of the county where the predominant use is agriculturally oriented, where watershed areas, reservoirs and floodplain tributaries are located, where development would adversely impact on all such uses (Napa County Code Section 18.20.010.). To the extent applicable, the Project would be consistent with current zoning, as the continued use and potential environmental impacts of the proposed project have been reviewed under CEQA, and found to be consistent with applicable designations.

### III. CONSISTENCY ANALYSIS:

This memorandum outlines the relevant goals and policies of the County's General Plan, and analyzes whether the Project with implementation of the Reduced Production Alternative conforms to the General Plan required by Government Code Section 65402.

#### A. **The Agricultural Preservation and Land Use Element:**

- **Policy AG/LU-9:** The County shall evaluate discretionary development projects, re-zonings, and public projects to determine their potential for impacts on farmlands mapped by the State Farmland Mapping and Monitoring Program, while recognizing that the state's farmland terminology and definitions are not always the most relevant to Napa County, and shall avoid converting farmland where feasible.
- **Policy AG/LU-51:** The following standards shall apply to lands designated as Industrial on the Land Use Map of this General Plan.

Intent: To provide an environment exclusively for and conducive to the development and protection of a variety of industrial uses such as warehouses, manufacturing, wineries and food processing facilities that are industrial in character, and research and development. Administrative facilities, research institutions, limited office and commercial uses and related facilities which are ancillary to the primary industrial uses may also be accommodated.

- **Policy AG/LU-55:** The County shall ensure that the special features in each geographic area shown in this General Plan shall be retained or enhanced and shall consider these features in its review of any proposed development project.
- **Policy AG/LU-56:** The policies set forth for each geographic area are extensions or refinements of County-wide policy. The role of these local policies is to identify more specific land uses and local conditions within the general parameters established by the County-wide goals and policies.
- **Policy AG/LU-93:** The County supports the continued concentration of industrial uses in the South County area as an alternative to the conversion of agricultural land for industrial use elsewhere in the county.

**Conclusion:** Consistent.

**Analysis:** The holding and project area are not within any areas that have been mapped by the State as farmland. Industrial activities associated with the quarry operations, including aggregate crushing and processing, and asphalt production is primarily located in the industrial designated portions of the property. Within the overall General Plan Land Use Map (General Plan Land Use Map, Figure AG/LU-3) and within the specified South County Industrial geographic area (General

Plan page AG/LU-53), a majority of the holding and project area is designated a Mineral Resource Area. The proposed project and associated surface mining permit will retain this feature.

The Project would not displace agriculture or remove agricultural lands from agricultural use. The Project will be located in an area that is already been disturbed or experiences the effects of mining and related activities. The Project proposes continued operation of quarry and aggregate related operations including aggregate processing and asphalt production, which occurs on lands zoned Industrial, the intent of which allows for industrial uses. While the Project itself does not support agricultural land uses, it is not anticipated that the Project will result in adverse effects to those parcels that currently or in the foreseeable future support agriculture.

**B. The Circulation Element:**

- **GOAL CIR-2:** The County's transportation system shall provide for safe and efficient movement on well-maintained roads throughout the County, meeting the needs of Napa County residents, businesses, employees, visitors, special needs populations, and the elderly.
- **Policy CIR-16:** The County shall seek to maintain an adequate level of service on roads and at intersections as follows. The desired level of service shall be measured at peak hours on weekdays.
  - The County shall seek to maintain an arterial LOS D or better on all county roadways, except where maintaining this desired level of service would require the installation of more travel lanes than shown on the Circulation Map.
  - The County shall seek to maintain a LOS D or better at all signalized intersections, except where the level of service already exceeds this standard (i.e., LOS E or F) and where increased intersection capacity is not feasible within the existing right-of-way.
  - No single level of service standard is appropriate for unsignalized intersections, which shall be evaluated on a case-by case basis to determine if signal warrants are met.
- **Policy CIR-19:** Applicants proposing new discretionary development projects with the potential to significantly affect traffic operations shall be required to prepare a traffic analysis prior to consideration of their project by the County and shall be required to mitigate project impacts and to pay their fair share of countywide cumulative traffic improvements based on their contribution to the need for these improvements.
- **GOAL CIR-3:** The County's transportation system shall encompass the use of private vehicles, local and regional transit, paratransit, walking, bicycling, air travel, rail, and water transport.
- **Policy CIR-25:** Preserve rail corridors and the navigable sections of the Napa River as regional transportation assets, encouraging and not precluding their future use for recreational travel as well as for the movement of passengers and goods.

**Conclusion:** Consistent.

**Analysis:** A traffic analysis has been prepared for the Project and associated Environmental Impact Report, in which the finding has been presented to the Commission for its consideration. The traffic levels associated with intersections studied in the traffic analysis are expected to continue to operate at the same level of service as they do under existing conditions, with implementation of the Reduced Production Alternative. Operation of the quarry would utilize rail and barge transportation systems to effectively, economically, and safely move products to and from the facility, thereby preserving existing alternative transportation systems as assets.

Furthermore, the Project is consistent with goals and policies related to the safe and efficient movement of goods via rail and water transport.

**C. The Community Character Element:**

***Cultural Resources***

- **Goal CC-4:** Identify and preserve Napa County's irreplaceable cultural and historic resources for present and future generation to appreciate and enjoy.
- **Policy CC-19:** The County supports the identification and preservation of resources from the County's historic and prehistoric periods.
- **Policy CC-21:** Rock walls constructed prior to 1920 are important reminders of the County's agricultural past. Rock walls which follow property lines or designated scenic roadways shall be retained to the extent feasible and modified only to permit required repairs and allow for openings necessary to provide for access.
- **Policy CC-23:** The County supports continued research into and documentation of the county's history and prehistory, and shall protect significant cultural resources from inadvertent damage during grading, excavation, and construction activities.

**Conclusion:** Consistent.

**Analysis:** Based on specific on-site studies, cultural and historic resources have been identified both within the quarry property and project area. However, the project as designed would avoid a majority of the cultural and historic resources identified within the quarry, in particular, the sites exhibiting homestead activities and rock walls located along property lines. Additionally, mitigation measures have been incorporated into the project, as well as the incorporation of standard conditions to ensure any discovered resources during operations are protected (Impact Action Item CC-23.1), to protect retained rock walls from ongoing quarry activities.

**Noise**

- **Goal CC-8:** Place compatible land uses where high noise levels already exist and minimize noise impacts by placing new noise-generating uses in appropriate areas.
- **Policy CC-38:** The following are the County’s standards for maximum exterior noise levels for various types of land uses established in the County’s Noise Ordinance. Additional standards are provided in the Noise Ordinance for construction activities (i.e., intermittent or temporary noise).

**EXTERIOR NOISE LEVEL STANDARDS  
 (LEVELS NOT TO BE EXCEEDED MORE THAN 30 MINUTES IN ANY HOUR)**

Land Use Types	Time Period	Noise Level (dBA) by Noise Zone Classification		
		Rural	Suburban	Urban
Single-Family Homes and Duplexes	10 p.m. to 7 a.m.	45	45	50
	7 a.m. to 10 p.m.	50	55	60
Multiple Residential 3 or More Units Per Building (Triplex +)	10 p.m. to 7 a.m.	45	50	55
	7 a.m. to 10 p.m.	50	55	60
Office and Retail	10 p.m. to 7 a.m.	60		
	7 a.m. to 10 p.m.	65		
Industrial and Wineries	Anytime	75		

- For the purposes of implementing this policy, standards for residential uses shall be measured at the housing unit in areas subject to noise levels in excess of the desired levels shown above.
  - Industrial noise limits are intended primarily for use at the boundary of industrial zones rather than for noise reduction at the industrial use.
  - Where projected noise levels for a given location are not included in this Element, site-specific noise modeling may need to be conducted in order to apply the County’s Noise policies.
- **Policy CC-48:** Where proposed commercial or industrial land uses are likely to produce noise levels exceeding the standards contained in this Element at existing or planned noise-sensitive uses, an acoustical analysis shall be required as part of the environmental review process so that noise mitigation may be included in the project design.

**Conclusion:** Consistent.

***Analysis:*** The quarry is already located in an area of the County that experiences higher noise levels. There are a variety of surrounding uses, including industrial, office/warehouse, public institutional, and agriculture, in addition to State Highway 221, that contribute substantially to the environment that make up the areas ambient noise characteristics. Noise studies have been conducted as part of the environmental review of the project and mitigation measures have been included to reduce potential noise impacts on adjacent uses so that long-term operational noise, including mobile equipment related noises, would not result in the exposure of persons to or generate noise levels in excess of applicable standards, or substantial temporary increases in ambient noise levels in the vicinity of the Project.

#### ***Odors***

- **Goal CC-51:** Place compatible land uses where unacceptable odors already exist and minimize any new uses that generate such odors.
- **Policy CC-53:** Odors associated with industrial and commercial uses – in particular, those generated by chemical or industrial processes – are considered generally unacceptable, and shall be required to mitigate their effects on nearby businesses and residences in accordance with standards of the Bay Area Air Quality Management District (BAAQMD).

**Conclusion:** Consistent.

***Analysis:*** The operations primary industrial components (i.e. asphalt plant, sand plant, and blue rock plant, and scale house and office) are within the western portion of the site in close proximity to other industrial uses and State Highway 221, as well as, more intensive agricultural uses (i.e. cultivated crops) to the south. These existing facilities are not anticipated to be relocated. Additionally, no new odor producing sources are proposed as part of the project. Therefore, the Project is not anticipated to result in adverse odor impacts because the facilities odor causing uses are in an area where odors already exist and no new odor sources are proposed.

Additionally, through mitigation and project specific conditions the facility will need to be operated in accordance with BAAQMD standards and permitting consistent with regulatory requirements.

#### **D. The Conservation Element:**

##### ***Open Space Conservation***

- **Goal CON-1:** The County of Napa will conserve resources by determining the most appropriate use of land, matching land uses and activities to the land's natural suitability, and minimizing conflicts with the natural environment and the agriculture it supports.
- **Policy CON-1:** The County will preserve land for greenbelts, forest, recreation, flood control, adequate water supply, air quality improvement, habitat for fish, wildlife and wildlife

movement, native vegetation, and natural beauty. The County will encourage management of these areas in ways that promote wildlife habitat renewal, diversification, and protection.

**Conclusion:** Consistent.

**Analysis:** A majority of the subject holding and project site has been identified as a Mineral Resource area in the County General Plan. The industrial identified areas of the site are utilized for the primary industrial facilities of the operation. Therefore, the County has conserved suitable lands for mineral production and associated activities.

Through project design and implementation of the Reduced Production Alternative, mitigation measures, and project specific conditions, which include protections for air quality, water quality and use, and biological resources the projects potential conflicts with the natural environment or agricultural would be minimize. The project has been designed to avoid the northeast corner and the southern portion of the holding, thereby preserving these areas in their existing condition to provide visual buffering of the project. Additionally, other exclusion areas within the quarry operation, such as in between the State Blue and State Grey pits, and knoll south of the Eagles Nest area, have been preserved to maintain some natural visual elements within the quarry.

#### ***Natural Resources***

- **Goal CON 2:** Maintain and enhance the existing level of biodiversity.
- **Goal CON-3:** Protect the continued presence of special status species, including special-status plants, special-status wildlife, and their habitats, and comply with all applicable state, federal, or local laws or regulations.
- **Goal CON-5:** Protect connectivity and continuous habitat areas for wildlife movement.
- **Policy CON-11:** The County shall maintain and improve fisheries habitat through a variety of appropriate measures, including: Control sediment production from mines, roads, development projects, agricultural activities, and other potential sediment sources.
- **Policy CON-13:** The County shall require that all discretionary residential, commercial, industrial, recreational, agricultural, and water development projects consider and address impacts to wildlife habitat and avoid impacts to fisheries and habitat supporting special-status species to the extent feasible. Where impacts to wildlife and special-status species cannot be avoided, projects shall include effective mitigation measures and management plans including provisions to:

- **Policy CON-16:** The County shall require a biological resources evaluation for discretionary projects in areas identified to contain or potentially contain special-status species based upon data provided in the Baseline Data Report (BDR), California Natural Diversity Database (CNDDDB), or other technical materials. This evaluation shall be conducted prior to the approval of any earthmoving activities. The county shall also encourage the development of programs to protect special-status species and disseminate updated information to state and federal resource agencies.
- **Policy CON-17:** Preserve and protect native grasslands, serpentine grasslands, mixed serpentine chaparral, and other sensitive biotic communities and habitats of limited distribution. The county, in its discretion, shall require mitigation that results in the following standards:
- **Policy CON-18:** To reduce impacts on habitat conservation and connectivity: The county shall require discretionary projects to retain movement corridors of adequate size and habitat quality to allow for continued wildlife use based on the needs of the species occupying the habitat.
- **Policy CON-24:** Maintain and improve oak woodland habitat to provide for slope stabilization, soil protection, species diversity, and wildlife habitat through appropriate measures including one or more of the following:
  - a) Preserve, to the extent feasible, oak trees and other significant vegetation that occur near the heads of drainages or depressions to maintain diversity of vegetation type and wildlife habitat as part of agricultural projects.
  - c) Provide replacement of lost oak woodlands or preservation of like habitat at a 2:1 ratio when retention of existing vegetation is found to be infeasible. Removal of oak species limited in distribution shall be avoided to the maximum extent feasible.
- **Policy CON-30:** All public and private projects shall avoid impacts to wetlands to the extent feasible. If avoidance is not feasible, projects shall mitigate impacts to wetlands consistent with state and federal policies providing for no net loss of wetland function.

**Conclusion:** Consistent.

**Analysis:** Because of the historic surface mining use of the site, and its location at the interface between more intensive urban uses located to the north and west within both the City and County of Napa (including State Highway 221) as well as more intensive agriculture uses including cultivated crops to the south, the biological characteristics and resources of the site and

surrounding areas have been augmented. Biological surveys have been conducted for the site and mitigation has been incorporated to protect and replace special-status species that have been identified within the project area or have the potential to occur within or adjacent to the project area. Potential native grasslands occurring in the property have been avoided through project design. Avoiding and maintaining Arroyo Creek and areas south of Arroyo Creek in its current condition would maintain an existing wildlife movement and use areas that have not experience historic disturbances through surrounding development and mining activities. Mitigation has been included to preserve and replace oak woodlands at a 2:1 ratio.

Impacts to fisheries habitat will be minimized through ongoing maintenance of a Storm Water Pollution Prevention Plan (SWPPP) required by the San Francisco Regional Water Quality Control Board (SFRWQCB), mitigation, conditions, and the County's Stormwater Ordinance. The SWPPP utilizes specific site design and treatment control Best Management Practices (BMPs) to control on-site erosion and protect water quality. Furthermore, the SWPPP will be updated as necessary as part of the annual mining plan to take into account changing conditions of the site and operations as a result of ongoing mining.

Impacts to riparian areas have been minimized through a project design that provides a minimum 50 foot setback from Arroyo Creek, and the implementation of mitigation that results in larger setbacks from Arroyo Creek of 85 feet. Extensive wetlands have not been identified in the project area. Although approximately 0.5-acres of wetland would be removed with project design, mitigation has been included that would result in the replacement of removed wetland so that there is no net loss of wetlands as a result of the project.

### *Mineral Resources*

- **Goal CON-7:** Identify and conserve areas containing significant mineral deposits for future use and promote the reasonable, safe, and orderly operation of mining and extraction and management activities, where environmental, aesthetic, and adjacent land use compatibility impacts can be adequately addressed.
- **Policy CON-37:** The County shall identify, improve, and conserve mineral and aggregate resources and ensure the long-term production and supply as follows:
  - d) Fulfill the County's responsibilities under the Surface Mining and Reclamation Act (SMARA).
  - e) Encourage compatible use of resource areas such as low density recreation, wildlife habitat, or agriculture and protect resource areas from incompatible uses.
- **Policy CON-39:** Resource extraction activities (e.g., mining and geothermal development) shall fully address environmental implications, such as air pollution, visual distractions, siltation of nearby streams, increase in surface runoff, removal of

underground water by pumping, increase in erosion or landslide hazard, disposal of chemical wastes, creation of impervious layers and surface compaction, extent of vegetation removal, and site rehabilitation procedures.

- **Policy CON-40:** Encourage the ongoing reclamation of sand and gravel mining areas through the implementation of reclamation plans. In conformance with state law, all mining operations shall have up-to-date reclamation plans and adequate financial assurances to the satisfaction of the County.

**Conclusion:** Consistent.

**Analysis:** The County has previously identified this area as containing mineral resources through the General Plan Mineral Resource designation that covers a majority of the holding and project area. Through this Surface Mining Permit (SMP), with incorporation of the Reduced Production Alternative, mitigation, and conditions of approval, the County will be promoting the reasonable and orderly extraction and processing of aggregate resources. Furthermore, the County and operator would continue to fulfill their responsibilities under the Surface Mining and Reclamation Act (SMARA) and maintain an up to date reclamation plan and financial assurances. Additionally, the associated environmental review of the SMP takes into consideration potential environmental affects and incorporates mitigation where necessary to reduce impacts.

Furthermore, pursuant to Public Contract Code Sections 10295.5 and 20676 mining operations that are not being operated to meet provisions set forth under the Surface Mining and Reclamation Act ((SMARA – specifically California’s Public Resources Code, Section 2717(b)) are precluded from selling sand, gravel, aggregates or other mined materials to state or local agencies. Facilities that are operated in compliance with SMARA are included on what is typically referred to as the AB3089 List, for the legislation that established it. The next closest operations to Napa on the AB 3089 List are located in Sonoma and Solano Counties. Therefore, maintaining this operation in compliance with SMARA is beneficial to both the County and local cities by providing and maintaining a local source of aggregate for public projects: also see Section E (Economic Development).

#### ***Water Resources***

- **Goal CON-9:** Control urban and rural storm water runoff and related non-point source pollutants, reducing to acceptable levels pollutant discharges from land-based activities throughout the County.
- **Goal CON-10:** Conserve, enhance and manage water resources on a sustainable basis to attempt to ensure that sufficient amounts of water will be available for the uses allowed by this General Plan, for the natural environment, and for future generations.

- **Goal CON-11:** Prioritize the use of available groundwater for agricultural and rural residential uses rather than for urbanized areas and ensure that land use decisions recognize the long term availability and value of water resources in Napa County.
- **Policy CON-47:** The County shall comply with applicable Water Quality Control/Basin Plans as amended through the Total Maximum Daily Load (TMDL) process to improve water quality. In its efforts to comply, the following may be undertaken:
  - e) Ensuring continued effectiveness of the National Pollution Discharge Elimination System (NPDES) program and storm water pollution prevention.
- **Policy CON-48:** Proposed developments shall implement project-specific sediment and erosion control measures (e.g., erosion control plans and/or stormwater pollution prevention plans) that maintain pre-development sediment erosion conditions or at minimum comply with state water quality pollution control (i.e., Basin Plan) requirements and are protective of the County's sensitive domestic supply watersheds. Technical reports and/or erosion control plans that recommend site-specific erosion control measures shall meet the requirements of the County Code and provide detailed information regarding site specific geologic, soil, and hydrologic conditions and how the proposed measure will function.
- **Policy CON-50:** The County will take appropriate steps to protect surface water quality and quantity, including the following:
  - a) Preserve riparian areas through adequate buffering and pursue retention, maintenance, and enhancement of existing native vegetation along all intermittent and perennial streams through existing stream setbacks in the County's Conservation Regulations
  - c) The County shall require discretionary projects to meet performance standards designed to ensure peak runoff in 2-, 10-, 50-, and 100-year events following development is not greater than predevelopment conditions.
  - e) In conformance with National Pollution Discharge Elimination System (NPDES) requirements, prohibit grading and excavation unless it can be demonstrated that such activities will not result in significant soil erosion, silting of lower slopes or waterways, slide damage, flooding problems, or damage to wildlife and fishery habitats
- **Policy CON-53:** The County shall ensure that the intensity and timing of new development are consistent with the capacity of water supplies and protect groundwater and other water supplies by requiring all applicants for discretionary projects to demonstrate the availability of an adequate water supply prior to approval. Depending on the site location and the specific circumstances, adequate demonstration of availability may include evidence or calculation of groundwater availability via an appropriate hydrogeologic analysis or may be satisfied by compliance with County Code "fair-share" provisions or applicable State law. In some areas,

evidence may be provided through coordination with applicable municipalities and public and private water purveyors to verify water supply sufficiency.

- **Policy CON-55:** The County shall consider existing water uses during the review of new water uses associated with discretionary projects, and where hydrogeologic studies have shown that the new water uses will cause significant adverse well interference or substantial reductions in groundwater discharge to surface waters that would alter critical flows to sustain riparian habitat and fisheries or exacerbate conditions of overdraft, the County shall curtail those new or expanded water uses.
- **Policy CON-62:** As stated in Policy AG/LU-74, the County supports the extension of recycled water to the Coombsville area to reduce reliance on groundwater in the MST groundwater basin and exploration of other alternatives. Also, the County shall identify and support ways to utilize recycled water for irrigation and non-potable uses to offset dependency on groundwater and surface waters and ensure adequate wastewater treatment capacity through the following measures:
  - d) Encourage the use of non-potable/recycled water wherever recycled water is available and require the use of recycled water for golf courses where feasible.

**Conclusion:** Consistent.

**Analysis:**

***Water Quality*** - The Project will comply with requirements of the San Francisco Regional Water Quality Control Board (SFRWQCB) through preparation and maintenance of a Stormwater Pollution Prevention Plan (SWPPP) that includes the incorporation of source control, site design, and treatment control Best Management Practices (BMPs) to control on-site erosion and pollutants to protect water quality. The operator/permittee will be required through the SWPPP and County Stormwater Management Ordinance to implement BMPs and best available control stormwater management principles during project operations and subsequent reclamation. The SWPPP will be annually reviewed and updated as necessary to control stormwater runoff and maintain water quality. Furthermore, with project specific standards and incorporation of mitigation, the annually maintained and updated SWPPP for the site will be designed and prepared to demonstrate that project runoff flow characteristics following mining and reclamation activities are not greater than predevelopment conditions.

***Water Supply*** – Groundwater use and protections measures include a maximum allowable annual groundwater use provision for the project and permit, and provisions to avoid mining into the groundwater table. These measures are expected to protect groundwater resources and allow for continued groundwater infiltration. Furthermore, these measures in conjunction with the site's and operator/permittee's ability to access recycled water will encourage the operator/permittee to

minimize groundwater use while encouraging the use of recycled water. Incorporation of these measures and the Reduced Production Alternative are also anticipated to reduce potential impacts to agricultural water sources located to the south.

***Climate Protection and Environmental Health***

- **Goal CON-15:** Reduce emissions of local greenhouse gases that contribute to climate change.
  
- **Goal CON-17:** Reduce air pollution and reduce local contributions to regional air quality problems, achieving and maintaining air quality in Napa County which meets or exceeds state and federal standards.
  
- **Policy CON-65:** The County shall support efforts to reduce and offset GHG emissions and strive to maintain and enhance the County’s current level of carbon sequestration functions through the following measures:
  - b. Preserve and enhance the values of Napa County’s plant life as carbon sequestration systems to recycle greenhouse gases.
  
  - e. Consider GHG emissions in the review of discretionary projects. Consideration may include an inventory of GHG emissions produced by the traffic expected to be generated by the project, any changes in carbon sequestration capacities caused by the project, and anticipated fuel needs generated by building heating, cooling, lighting systems, manufacturing, or commercial activities on the premises. Projects shall consider methods to reduce GHG emissions and incorporate permanent and verifiable emission offsets.
  
- **Policy CON-66:** The County shall promote the implementation of sustainable practices and green technology in agriculture, commercial, industrial, and residential development through the following actions:
  - a.2) Minimize, reuse, and recycle construction-related waste.
  
  - a.3) Utilize alternative fuels in construction equipment and require construction equipment to utilize the best available technology to reduce emissions.
  
- **Policy CON-77:** All new discretionary projects shall be evaluated to determine potential significant project-specific air quality impacts and shall be required to incorporate appropriate design, construction, and operational features to reduce emissions of criteria pollutants regulated by the state and federal governments below the applicable significance standard(s) or implement alternate and equally effective

mitigation strategies consistent with BAAQMD's air quality improvement programs to reduce emissions.

- **Policy CON-80:** The County shall seek to reduce particulate emissions and avoid exceedences of state particulate matter (PM) standards by:
  - e. Requiring implementation of dust control measures during construction and grading activities and enforcing winter grading deadlines.

**Conclusion:** Consistent.

**Analysis:** The Project is anticipated to result in Greenhouse Gas (GHG) and other emissions, including particulate matter, which affects air quality through project operations and transport of materials. Through implementation of the Reduced Production Alternative, mitigation measures, and project specific conditions, operational emissions that contribute to GHG and other emissions, including particulate matter, which are detrimental to air quality and associated health risks would be substantially reduced to less than significant levels. Additionally, measures are included to require mining and processing equipment to utilize the best available technology to reduce GHG and other emissions detrimental to air quality in order to reduce associated health risks.

Mitigation to preserve and replace oak woodlands would assist in preserving and enhancing carbon sequestration systems.

Furthermore the project would continue ongoing construction material recycling and reuse, including the increased ability to utilize recycled materials through introduction of the Reclaimed Asphalt Pavement handling equipment to the operations asphalt plant.

**E. Economic Development:**

- **GoalE-2:** Develop and promote a diversity of business opportunities which do not conflict with agriculture.

**Conclusion:** Consistent.

**Analysis:** The project and associated surface mining permit would maintain and promote a diversity of business and provide for a local long term local source of aggregate. This source will continue to support local and regional private and public development, including a local source to maintain existing infrastructure, in particular roadways of the County and its incorporated cities.

Furthermore, pursuant to Public Contract Code Sections 10295.5 and 20676 mining operations that are not being operated to meet provisions set forth under the Surface Mining and Reclamation Act ((SMARA – specifically California's Public Resources Code, Section 2717(b)) are precluded from

selling sand, gravel, aggregates or other mined materials to state or local agencies. Facilities that are operated in compliance with SMARA are included on what is typically referred to as the AB3089 List, for the legislation that established it. The next closest operations to Napa on the AB 3089 List are located in Sonoma and Solano Counties. Therefore, maintaining this operation in compliance with SMARA promotes business diversity that is beneficial to both the County and surrounding cities by providing and maintaining a local source of aggregate for public projects.

**F. The Safety Element:**

- **Policy SAF-8:** Consistent with County ordinances, require a geotechnical study for new projects and modifications of existing projects or structures located in or near known geologic hazard areas, and restrict new development atop or astride identified active seismic faults in order to prevent catastrophic damage caused by movement along the fault. Geologic studies shall identify site design (such as setbacks from active faults and avoidance of on-site soil-geologic conditions that could become unstable or fail during a seismic event) and structural measures to prevent injury, death and catastrophic damage to structures and infrastructure improvements (such as pipelines, roadways and water surface impoundments not subject to regulation by the Division of Safety of Dams of the California Department of Water Resources) from seismic events or failure from other natural circumstances.
- **Policy SAF-30:** Potential hazards resulting from the release of liquids (wine, water, petroleum products, etc.) from the possible rupture or collapse of aboveground tanks should be considered as part of the review and permitting of these projects.

**Conclusion:** Consistent.

**Analysis:** A Geotechnical study has been prepared for the project and associated environmental review. The Syar Napa Quarry maintains a Hazardous Materials Business Plan as part of current operations to address potential hazards occurring at the site. The project's EIR reviewed potential damage to infrastructure as a result of blasting and found that surrounding infrastructure is not expected to experience damage due to blasting. Additionally, specific mitigation and conditions of approval have been incorporated to further reduce potential geologic and stability impacts associated with mining, and protect the public and environment from potential hazardous materials utilized and transported to and from the site as part of mining operations.