



A Tradition of Stewardship  
A Commitment to Service

Agenda Date: 8/15/2018

Agenda Placement: 7A

## Napa County Planning Commission Board Agenda Letter

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**TO:** Napa County Planning Commission

**FROM:** Charlene Gallina for David Morrison - Director  
Planning, Building and Environmental Services

**REPORT BY:** Jason Hade, Planner III - (707) 259-8757

**SUBJECT:** Revised Draft Climate Action Plan and Notice of Preparation Scoping Meeting

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### **RECOMMENDATION**

#### **REVISED DRAFT CLIMATE ACTION PLAN (CAP)**

**CEQA Status:** Staff and Ascent Environmental, Inc. are in the process of preparing an Environmental Impact Report (EIR) to be considered for certification by the Planning Commission at the time the final Climate Action Plan (CAP) is brought forward for adoption.

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

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

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

**Staff Recommendation:** Provide comments on the Revised Draft CAP and conduct a scoping meeting regarding

the Notice of Preparation of a Draft EIR for the CAP.

**Staff Contact:** David Morrison, PBES Director, (707) 253-4805 or [david.morrison@countyofnapa.org](mailto:david.morrison@countyofnapa.org) or Jason R. Hade, AICP, Planner III, (707) 259-8757 or [jason.hade@countyofnapa.org](mailto:jason.hade@countyofnapa.org)

**(THIS ITEM SET TO BE DISCUSSED AT 9:00 AM)**

## **EXECUTIVE SUMMARY**

### **Proposed Actions:**

That the Planning Commission:

1. Provide feedback and direction to staff and Ascent Environmental, Inc. concerning the Draft Revised CAP; and
2. Conduct a scoping meeting to solicit public comments regarding the Notice of Preparation of a Draft EIR for the CAP.

### **Discussion:**

Among the actions required in the General Plan is the preparation of a CAP. The Planning Division started work on the document in 2015 with assistance from Ascent Environmental, Inc. an environmental consulting firm. Ascent Environmental, Inc. was selected to complete the CAP based upon a number of factors including their history of work experience in Napa County, preparation of Environmental Impact Reports for several recent high profile projects, and specialized training and exceptional expertise in the field of climate change adaptation. Ascent staff have provided technical support on GHG emissions to the Association of Bay Area Governments (ABAG), California Air Pollution Control Officers Association, California Air Resources Board, Sacramento Area Council of Governments (SACOG), and the State Attorney General's Office.

The CAP incorporates current guidance from the California Air Resources Board and the State Legislature (i.e. Senate Bill 32). Several voluntary adaptation actions (strategies and measures aimed at reducing local contributions to global climate change) are already underway such as the Napa River Flood Project, Updated Hazard Mitigation Plan, Green Business Certification Program, Marin Clean Energy program, oak woodland protection policies and programs, a partnership with Pepperwood Preserve, Sustainable Napa County, and Recycled Water Program which are incorporated into the adaptation section of the CAP. Key internal and external stakeholders were engaged through public outreach efforts which took place throughout the preparation of the CAP. To date, staff and Ascent Environmental Inc. have held four public workshops concerning the CAP and prepared a Final Draft CAP. An earlier draft document was released for public review and comment on January 26, 2017. 45 public comment letters were received during the public review period which concluded on March 10, 2017. Following that release, the Final Draft CAP together with Appendix D was finalized by Staff and Ascent and made available for public review and posted to the County's website on June 5, 2017. In addition, a red-lined version of the same document is provided in Attachment G highlighting changes between the Draft document and the Final Draft CAP.

The Planning Commission reviewed and discussed the Final Draft CAP at its regularly scheduled meeting of July 5, 2017. After listening to the staff presentation and public comments, the Planning Commission voted 3-0 to continue the item to the meeting of September 20, 2017 at which time it was continued off-calendar. Since that meeting, Staff worked extensively with the project consultant, Ascent Environmental, Inc. and County Counsel to analyze all comments received to date. Staff also evaluated the previously prepared Final Draft CAP in light of recent court cases.

A Revised Draft CAP and NOP for the Draft EIR to be prepared were released for public review on July 24, 2018. Comments for both the revised plan and NOP are due on August 22, 2018. The Revised Draft CAP includes: a baseline GHG emissions inventory (Chapter 2); GHG emissions forecasts and reduction targets (Chapter 2); revised local GHG emissions and reduction strategies and measures (Chapter 3); a climate change vulnerability assessment (Chapter 4); and implementation and monitoring mechanisms (Chapter 5). Please refer to the plan's executive summary for additional details as well as the chapters just referenced. Highlights from each of these revised chapters are described in more detail within the background section of this staff report.

A revised CAP consistency review checklist (Appendix D of the Revised Draft CAP) was also developed to aid project applicants in determining whether a project is consistent with the County's CAP. The checklist is intended to provide a streamlined review process for proposed new development projects which are subject to discretionary review and trigger environmental review pursuant to CEQA. As a qualified greenhouse gas emission reduction plan, the CAP will be used in cumulative impact analyses concerning proposed development projects allowing those projects which demonstrate consistency with the CAP to utilize this streamlining process. Projects that achieve consistency with the CAP and the County's General Plan policies may be able to conclude no additional significant environmental effects in their CEQA review.

### **FISCAL IMPACT**

Is there a Fiscal Impact?                      No

### **ENVIRONMENTAL IMPACT**

Staff and Ascent Environmental, Inc. are in the process of preparing an Environmental Impact Report (EIR) to be considered for certification by the Planning Commission at the time the final CAP is brought forward for adoption.

### **BACKGROUND AND DISCUSSION**

#### **Plan History**

The General Plan calls for the preparation of a CAP under General Plan Action Item CON CPSP-2. Action Item CON CPSP-2 specifically directed the County to develop a GHG emissions inventory in a manner consistent with AB 32 and then to develop an emission reduction plan that included consideration of a "green building" ordinance and other mechanisms "shown to be effective at reducing emissions."

According to Section 15183.5 of the CEQA Guidelines, a plan for the reduction of greenhouse gas emissions should: (A) Quantify greenhouse gas emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area; (B) Establish a level, based on substantial evidence, below which the contribution to greenhouse gas emissions from activities covered by the plan would not be cumulatively considerable; (C) Identify and analyze the greenhouse gas emissions resulting from specific actions or categories of actions anticipated within the geographic area; (D) Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level; (E) Establish a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels; and (F) Be adopted in a public process following environmental review.

At a special meeting of the Planning Commission and Board of Supervisors held on March 10, 2015, staff received direction to complete the preparation of the CAP. Ascent Environmental, Inc. was selected in July 2015 to complete the CAP based upon a number of factors including their history of work experience in Napa County, preparation of Environmental Impact Reports for several recent high profile projects, and specialized training and exceptional expertise in the field of climate change adaptation. Ascent staff have provided technical support on GHG emissions to the Association of Bay Area Governments (ABAG), California Air Pollution Control Officers Association, California Air Resources Board, Sacramento Area Council of Governments (SACOG), and the State Attorney General's Office.

To begin the process of preparing the CAP, a GHG Emissions Inventory and Forecasts was completed and is summarized in Technical Memorandum #1 completed on August 25, 2016 (Appendix A of Final Draft CAP). GHG Reduction Targets and a Gap Analysis was then prepared as Technical Memorandum #2 on December 2, 2016 (Appendix B of Final Draft CAP). A Climate Change Vulnerability Assessment for the County was also prepared as part of the plan and is included as Appendix C of the Final Draft CAP. A Public Review Draft CAP was released for public review and comment on January 26, 2017. 45 public comment letters were received during the public review period which concluded on March 10, 2017. Upon the closing of the public review period, staff and Ascent analyzed all feedback provided and prepared master responses to the comments, as well as, the Final Draft CAP. The Final Draft CAP was released for public review on June 5, 2017. It should be noted that a red-lined version of the same document was provided highlighting changes between the Draft document and the Final Draft CAP.

The Planning Commission reviewed and discussed the Final Draft CAP at its regularly scheduled meeting of July 5, 2017. After listening to the staff presentation and public comments, the Planning Commission voted 3-0 to continue the item to the meeting of September 20, 2017 at which time it was continued off-calendar. Since that meeting, Staff worked extensively with the project consultant, Ascent Environmental, Inc. and County Counsel to analyze all comments received to date. Staff also evaluated the previously prepared Final Draft CAP in light of recent court cases.

A Revised Draft CAP (Attachment A), revised appendices (Attachment B) and NOP (Attachment D) for the Draft EIR to be prepared were released for public review on July 24, 2018. Comments for both the revised plan and NOP are due on August 22, 2018. As completed previously, a red-lined version of the same document was provided highlighting changes between the Revised Draft document and the Final Draft CAP (Attachment C).

### **Public Outreach**

Staff and Ascent hosted four public workshops throughout the development of the CAP. The first workshop was held on November 9, 2015 and focused on an overview of the climate action planning process, plan schedule, and steps necessary to establish the baseline 2014 GHG inventory. Comments regarding potential GHG emissions sources to be included in the inventory update were solicited. The County's draft GHG inventory was presented at a public workshop held on February 24, 2016. Draft GHG emissions reduction targets, reduction measures, and gap analysis were discussed in detail at a third public workshop held on June 30, 2016. A final workshop was conducted at the Watershed Information and Conservation Council (WICC) Board meeting of February 23, 2017. The WICC Board meeting featured a presentation of the Public Review Draft CAP followed by a question and answer session. Each of the four public workshops was attended by approximately 25 to 35 persons.

### **Public Comments**

Public comments were requested and considered throughout the development of the Final Draft CAP including the preparation of the technical memorandums discussed above. In order to address the 45 public comment letters received during the public comment period for the Public Review Draft CAP, master responses were prepared. The responses address issues raised regarding inventory issues, short-lived climate pollutants, wetland and soil conservation/sequestration/storage, carbon sequestration and storage methods and land use change measures, agriculture issues, measures, benefits, carbon farming, transportation (Vehicle Miles Traveled, pedestrian/bike,

mobile source boundaries), CAP consistency checklist and CEQA 15183.5 requirements and cost burden. Where appropriate, revisions were made to the Public Review Draft CAP in order to address the public comments received such as in the area of agriculture issues, measures, benefits, and carbon farming. In other instances, the County has previously heard and addressed similar comments earlier in the planning process, and respectfully disagrees with the assertions being made. Public comments received on the Revised Draft CAP prior to today's meeting are included as Attachment E. As mentioned above, the deadline to submit comments on both the Revised Draft CAP and NOP is close of business August 22, 2018.

### **Revised Plan Summary**

The Revised Draft CAP includes: a baseline GHG emissions inventory (Chapter 2); GHG emissions forecasts and reduction targets (Chapter 2); local GHG emissions and reduction strategies and measures (Chapter 3); a climate change vulnerability assessment (Chapter 4); and implementation and monitoring mechanisms (Chapter 5). Please refer to the plan's executive summary for additional details as well as the referenced chapters. Highlights of the key revisions from each of these chapters are described below.

Greenhouse Gas Emissions Inventory, Forecasts, and Reduction Targets - A baseline GHG emissions inventory was prepared for 2014. The County's inventory was prepared in accordance with the U.S. Community Protocol for Accounting and Reporting Greenhouse Gas Emissions (International Council for Local Environmental Initiatives [ICLEI] 2012). According to this Protocol, local governments retain discretion regarding the scope of emissions to be included in a local community emissions inventory. Furthermore, as part of the scoping process for preparing a community emissions inventory, local governments need to consider what GHG accounting reporting framework is appropriate for preparation of their local CAP. Like many other local governments in California, the County prepared an emissions inventory using a framework consistent with the Protocol that accounts for emissions sources over which the County would have "significant influence." These sources primarily include community-wide activities that generate emissions within the boundaries of the unincorporated County; however, in the case of transportation, on-road vehicle trip origins and destinations may be located within the County (as a whole) or the broader region (i.e., the San Francisco Bay Area). Local community GHG emissions inventories are focused on emissions that occur within the physical boundaries of the local community or its surrounding region and over which local agencies have significant influence. Attempting to account for the global, life-cycle carbon footprint of the community in the context of a GHG emissions inventory for a local CAP could result in double counting emissions that are within the inventories of other jurisdictions in California or elsewhere. Furthermore, the State of California's GHG emissions inventories are not based on global, life-cycle emissions analysis; and, the GHG reduction targets established under Assembly Bill (AB 32) and Senate Bill (SB 32) do not assume that achievement of those targets applies to the State's global carbon footprint. Thus, considering the scoping guidance provided in the U.S. Community Protocol and consistent with the State's emissions inventories and efforts to reduce statewide GHG emissions, the preparation of the 2014 GHG emissions inventory for the County's CAP does not include the calculation of the community's global carbon footprint.

Approximately 484,283 metric tons of carbon dioxide equivalent (CO<sub>2</sub>e) were emitted by community-wide sources in the unincorporated County in 2014. The largest source of emissions was the Building Energy sector (i.e., residential and commercial/industrial buildings and other facilities), which accounted for 31 percent of the inventory; while the Transportation sector accounted for approximately 26 percent of the inventory. GHG emissions forecasts and reduction targets were identified for 2020, 2030 and 2050, consistent with State targets under AB 32 and SB 32. Without any future actions (i.e., "business-as-usual" conditions), GHG emissions are expected to increase by 2020, 2030 and 2050. GHG emissions reduction targets for the CAP were established consistent with the most recent guidance provided by the California Air Resources Board (ARB): 2 percent below 2014 levels by 2020; 40 percent below 2014 levels by 2030; and 77 percent below 2014 levels by 2050. Legislative actions by State or Federal agencies help to reduce emissions in the future, but are not sufficient by themselves to achieve the targets. Achieving the 2030 and 2050 targets will require local action to help close the gap between legislative-adjusted emissions forecasts and the emissions limits established by the CAP's targets. Attaining a 2 percent

reduction in GHG emissions will require that annual emissions be reduced to approximately 474,598 MTCO<sub>2e</sub> /year in 2020, which is about 9,686 MTCO<sub>2e</sub> /year lower than 2014 levels. Forecasts in the Final Draft CAP indicate the County will meet and exceed this reduction target by over 10,000 MTCO<sub>2e</sub> through existing legislative reductions. The CAP is focused on meeting the 2020 and 2030 targets, which are specific planning targets that will put the County on a long-term downward trajectory towards meeting the long-term 2050 goal.

Greenhouse Gas Reduction Strategies and Measures - Local GHG emissions reduction strategies and measures were identified to help the County achieve the 2020 and 2030 targets. GHG reduction strategies in the CAP are aligned with each of the eight GHG inventory sectors, and contain a total of 49 specific local GHG reduction measures that will achieve GHG reductions. Some of the GHG reduction measures will result in measurable, quantifiable reductions in emissions. Others are difficult to quantify, but will still contribute to achieving local reductions, either alone or in combination with legislative actions or other local GHG reduction measures. The top five measures in the CAP that will achieve the most local GHG emissions reductions by the year 2030 include: Measure BE-4: Requiring new or replacement residential water heating systems to be electrically-powered or alternatively-fueled (e.g., solar thermal, ground-source heat pump) will reduce emissions annually by 11,575 MTCO<sub>2e</sub> by 2030; Measure AG-2: Replacing diesel or gasoline-powered agricultural equipment with electric or alternatively-fueled equipment will reduce emissions annually by 8,540 MTCO<sub>2e</sub> by 2030; Measure OR-2: Replacing diesel or gasoline with alternative fuels in recreational watercraft through the County will reduce emissions annually by 7,512 MTCO<sub>2e</sub> by 2030; Measure LU-1: Establishing targets and enhanced programs that result in the preservation of oak woodlands and coniferous forests to avoid future carbon storage and sequestration losses, along with mandatory replanting to mitigate for tree loss when land use changes occur, will result in the annual reduction of 4,544 MTCO<sub>2e</sub> by 2030; and Measure TR-1: Updating and enforcing the County's Transportation System Management Ordinance will result in an annual reduction of 3,582 MTCO<sub>2e</sub> by 2030. While the measures included in the CAP are generally geared towards reducing GHG emissions, many will also result in environmental or economic "co-benefits," including climate adaptation co-benefits that will help to increase community resilience and improve public health.

Climate Change Vulnerability and Adaptation - A climate change vulnerability assessment was prepared and climate adaptation measures were developed to improve community sustainability. The climate change vulnerability assessment (Appendix C) determined that the County is vulnerable to several adverse impact climate change effects, including: increases in average temperatures and the frequency of heat waves and extreme heat events; changes to precipitation patterns; increased risk of wildfire, as evidenced by the October 2017 wildfires; increased likelihood of flooding; and increased risk of coastal flooding from sea-level rise. Specific adaptation measures are included in Chapter 4 to address these effects. Many of the measures require the County and other partnering agencies to address climate-related risks as part of existing planning processes, as well as move towards incremental changes in the way that County services and infrastructure are maintained and operated. Community education and awareness-building are also important components of the adaptation strategies.

Implementation and Monitoring - Implementation and monitoring mechanisms are identified that would help the County to ensure that the measures and targets are achieved. Implementation of the measures in the CAP would require the County to develop and implement new ordinances, programs and projects, or modify existing ones. This would require careful consideration of the operational and capital resources needed, as well as the timing and phasing of implementation. Relative County costs required to implement each measure are represented by an order of magnitude category (i.e., Low, Medium, High) . These categories are based on the anticipated level of resources, staffing, and time required to implement each measure. The general cost category is not intended to represent the relative costs of compliance, but rather focused on the County's costs to facilitate program development and implementation. For a more specific discussion of the relative costs and benefits of compliance with individual measures, see Appendix B. Staffing requirements for the County are presented in terms of the estimated number of full-time equivalent (FTE) employees needed to implement and coordinate CAP measures over one fiscal year. In some cases, the FTE estimates could be absorbed into existing work programs, while in other cases new work programs and associated staff positions could be required. More detailed estimates of

staffing and program costs will be developed during implementation of specific measures. Chapter 5 outlines these assumptions in detail. Monitoring is an important aspect of the CAP to ensure that the County is on track to achieve the GHG reduction targets and desired outcomes for increasing resilience in the face of a changing climate. To this end, the County would need to review and update the GHG emissions inventory periodically (every five years), track the community's progress on the implementation status of each measure in the CAP, and report back to the Board of Supervisors and the public at least every two years. The County would use the CAP to streamline the analysis of project-level GHG emissions pursuant to CEQA Guidelines Section 15183.5. Projects subject to discretionary review will be required to determine consistency with the CAP Consistency Checklist (see Appendix D). Local action on climate change cannot be addressed insularly by one agency or community, but requires active and ongoing partnerships between residents, businesses, the County, and other agencies and organizations in the region. On a community-wide level, individuals and businesses can play an important role in combating climate change. By changing habits to consume less energy; produce less waste through recycling, conserve water, and compost; and drive less by choosing to carpool, take transit, or walk and bike more frequently, individuals and businesses can work towards reducing their carbon footprint. The combination of these small efforts can lead to better outcomes for the environment and the County.

### **Next Steps**

Staff anticipates release of the Draft EIR for public review in late November 2018. The Final Revised CAP is slated for Planning Commission consideration in early 2019 followed by adoption by the Board of Supervisors in the first quarter of 2019.

### **Decision Making Options**

As noted in the Executive Summary Section above, no formal action is required by the Planning Commission at this time. The purpose of today's meeting is to: (1) Provide feedback and direction to staff and Ascent Environmental, Inc. regarding the Revised Draft CAP; and (2) Solicit public comments concerning the NOP for the Draft EIR to be prepared for the revised Plan.

### **SUPPORTING DOCUMENTS**

- A . Revised Draft Climate Action Plan
- B . Appendices
- C . Revised Draft Climate Action Plan - Redline Version
- D . Notice of Preparation
- E . Public Comments

Napa County Planning Commission: Approve

Reviewed By: Vincent Smith