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Conservation, Development and Planning

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Hillary Gitelman
Director

MEMORANDUM

To:	File No. P11-00010	From:	Hillary Gitelman
Date:	January 28, 2011	Re:	Proposed Climate Action Plan & CEQA Compliance

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

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

1. Preparation of a GHG emission reduction plan like the proposed Climate Action Plan is clearly called for in General Plan Action Item CON CPSP-2, and is therefore within the scope of the General Plan.
2. The program level EIR prepared for the General Plan Update contained an extensive discussion of climate change and GHG emissions in Section 3.4.4 of the Final EIR, including potential strategies for reducing emissions in compliance with AB 32.
3. When certifying the program-level EIR prepared for the General Plan Update, the Napa County Board of Supervisors concluded that impacts related to GHG emissions from development that might occur within the County during the time period of the General Plan (i.e. 2005-2030) would be significant and unavoidable, despite the adoption of a mitigation measure requiring the preparation of an emission reduction plan like the Climate Action Plan now proposed. This conclusion was conservative in the sense that

the Board did not pre-suppose that the adopted mitigation measure could or would be effective at reducing emissions to an acceptable level. The proposed Climate Action Plan would, however, reduce GHG emissions to 1990 levels consistent with AB 32, and would effectively mitigate the impact.

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

Following consideration of these factors and preparation of the attached initial study checklist, the County’s Department of Conservation, Development and Planning has concluded that the proposed Climate Action Plan falls within the scope of the General Plan approved in 2008, that the program EIR prepared for the General Plan Update adequately describes the activity for purposes of CEQA, and that there have been no changes in the General Plan, changes in circumstances under which the General Plan Update was adopted, or new information of substantial importance that would necessitate subsequent environmental review pursuant to CEQA Guidelines Section 15162. This conclusion and the proposed Climate Action Plan are subject to review and adoption by the Napa County Board of Supervisors, following receipt and review of a recommendation from the Napa County Planning Commission.

A copy of the General Plan Update EIR may be reviewed during business hours at the offices of the Department of Conservation, Development and Planning, 1195 Third Street in Napa, or on the County’s website at <http://www.countyofnapa.org/Pages/DepartmentDocuments.aspx?id=4294967660>. Reviewers are particularly directed to Section 3.4.4 of the Final EIR (on the website, see the document called “FEIR Responses Intro” and scroll to p. 3.0-49).

COUNTY OF NAPA
CONSERVATION, DEVELOPMENT & PLANNING DEPARTMENT
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Initial Study Checklist
(form updated September 2010)

1. **Project Title:** Climate Action Plan (Project No. P11-00010)
2. **Property Owner:** The project would apply to all properties within unincorporated Napa County.
3. **County Contact Person, Phone Number and email:** Hillary Gitelman (707) 253-4805
Hillary.gitelman@countyofnapa.org
4. **Project Location and APN:** The project would apply to all properties within unincorporated Napa County.
5. **Project sponsor's name and address:** Napa County Department of Conservation, Development & Planning, 1195 Third Street, Suite 201, Napa, CA 94559
6. **General Plan description:** The project would apply to all general plan designations.
7. **Zoning:** The project would apply to all zoning districts.
8. **Description of Project.** The proposed project is a Climate Action Plan for unincorporated Napa County. The Plan is proposed for adoption by the Napa County Board of Supervisors following public input and necessary modifications/adjustments in response to that input. The proposed Plan provides an inventory of Green House Gas (GHG) emissions from all sources within the community, a forecast of future emissions, and strategies for reducing emissions to 1990 levels by the year 2020 consistent with California Assembly Bill 32 (AB 32) adopted in 2006.

Strategies contained within the plan would require the County to take certain actions and would require applicants seeking approval of discretionary projects from the County to take certain actions. County measures include enforcement of the new California Building Code (Cal Green), implementation of an energy efficiency financing district, working with NCTPA on improvements to the transit network, working with employers to reduce commute trips by private auto, and other measures. Applicants proposing discretionary development projects (e.g. warehouses, wineries) would be required to comply with code requirements, replace 100% of the vegetation removed from the site, and further reduce or off-set project emissions by 5.5%. Applicants proposing discretionary vineyard projects (e.g. new vineyards on slopes of greater than 5%) would be required to reduce or offset 51.5% of projected emissions associated with vegetation removal and site preparation.

As proposed, the plan would achieve the goal of AB 32 and would be consistent with guidance provided by the Bay Area Air Quality Management District (BAAQMD). For that reason, the GHG emissions associated

with projects that are consistent with the plan -- once adopted -- would be considered less than significant pursuant to CEQA.

Once adopted, the proposed Climate Action Plan is intended to be reviewed and adjusted as circumstances warrant. Adjustments are most likely to be needed as the horizon year of 2020 approaches, and if the County adopts any new amendments to its General Plan.

9. **Describe the environmental setting and surrounding land uses.**

Napa County is a rural county of over 500,000 acres within the San Francisco Bay Area. Approximately 95% of the County lies outside of incorporated jurisdictions, and all of this land, with the exception of almost 100,000 acres that are in public ownership, is subject to the land use jurisdiction of the Napa County Board of Supervisors.

A full description of the County, its environment, and land uses is provided under each subject heading within Chapter 4.0 Environmental Setting, Impacts, and Mitigation Measures of the Draft EIR prepared for the General Plan Update (SCH# 2005102088, certified June 2008).

10. **Other agencies whose approval is required.** None.

ENVIRONMENTAL IMPACTS AND BASIS OF CONCLUSIONS:

The conclusions and recommendations contained herein are professional opinions derived in accordance with current standards of professional practice. They are based on a review of the Napa County Environmental Resource Maps, the other sources of information listed in the file, and the comments received, conversations with knowledgeable individuals and the preparer's personal knowledge of the area. For further information, see the environmental background information contained in the permanent file on this project.

On the basis of this initial evaluation:

I find that the proposed project is within the scope of the 2008 General Plan Update.

I find that the program-level EIR prepared for the 2008 General Plan Update adequately describes the project for the purposes of CEQA.

I find that there have been no changes to the General Plan, no changes to circumstances, and no new information of substantial importance that would necessitate supplemental environmental review.



January 28, 2011

Signature

Date

Hillary Gitelman, Director
Napa County Department of Conservation, Development & Planning

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

Discussion: As discussed under other topic headings, below, the General Plan Update EIR contained a projection of anticipated population, employment, and vineyard development in the unincorporated County from 2005 to 2030. The Climate Action Plan would apply to the period between its adoption (presumably mid-2011) and 2020, and would neither hasten nor impede land use changes anticipated in the General Plan Update EIR. To the extent that the Climate Action Plan achieves GHG emission reductions by encouraging or requiring applicants to avoid vegetation removal, replace vegetation via habitat restoration, reforestation, or undertake other similar activities, implementation of the plan would tend to reduce less than significant aesthetic impacts identified in the General Plan Update EIR. By calling for alternative energy generation, the Climate Action Plan could stimulate the installation of solar and wind energy systems that would be noticeable in the Napa County landscape. These alternative energy facilities have become a common sight, however, and there is no evidence that substantial adverse impacts would occur. Mitigation measures adopted as part of the General Plan (continued implementation of the Viewshed Protection Program, retention of trees along public roadways, retention of landscape characteristics for new roadway construction, requirements for visual compatibility, requirements related to light and glare) would continue to apply. (See Measures 4.14.1 & 2.)

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

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

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
d) Result in the loss of forest land or conversion of forest land to non-forest use in a manner that will significantly affect timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, or other public benefits?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X

Discussion: The General Plan Update EIR contained an analysis of potential losses of farmland over the life of the General Plan from 2005 to 2030, and contained mitigation to ensure that any impacts would be less than significant. The EIR also included a projection of vineyard development that would occur within the life of the plan, estimating that up to 12,500 additional acres could be converted to vineyard by 2030 (and about 7,500 acres between 2005 and 2020). Because it was not possible to predict precisely where this vineyard development would occur, the EIR analyzed several different scenarios to assess the range of possible impacts. Some of these scenarios assumed conversion of forest land to non-forest use, and others assumed removal of less carbon-rich vegetation. The Climate Action Plan that is currently proposed for adoption uses the General Plan EIR vineyard development scenarios in its analysis of potential changes in carbon sequestration. This does not mean that the Climate Action Plan would in any way hasten or impede vineyard development, or threaten forest resources in any way. In fact, the Climate Action Plan, if adopted, would have the effect of encouraging land owners who are considering vineyard development to develop less intensely vegetated areas first. It would also require developers of other discretionary projects (e.g. roads, wineries) to replace vegetation that is removed. In these ways, the Climate Action Plan would somewhat reduce the less than significant, significant, and significant and unmitigable impacts identified in the General Plan EIR related to agricultural resources. Mitigation measures 4.1.1 adopted as part of the General Plan would continue to apply.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X

Discussion: The proposed Climate Action Plan quantifies emissions of green house gas (GHG) emissions, which are discussed in Section VII below. There would be no increase in other pollutants or violations of air quality standards as a result of the plan and the air quality impacts of development projected during the life of the General Plan (2005-2030) would remain significant and unavoidable. Mitigation measures adopted as policies and action items within the General Plan would continue to apply. (See Mitigation Measures 4.8.1-5.)

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES. Would the project:				

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, Coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X

Discussion: As discussed in Section II, above, the General Plan EIR contained an analysis of vineyard development and other land use changes over the life of the General Plan. As a result of those changes, the EIR concluded there could be a significant and unavoidable loss of sensitive biotic communities, including oak woodlands. Mitigation measures were adopted as part of the General Plan to address this impact, but were not deemed sufficient to reduce the impact to less than significant. Other biological impacts were considered significant and mitigable. The Climate Action Plan would not change the conclusions of the General Plan EIR's analysis, but could somewhat reduce the impact on sensitive biotic communities if it effectively encourages vineyard developers to focus on areas of non-native grassland before focusing on more carbon-rich vegetated areas, such as oak woodlands. Mitigation measures adopted as part of the General Plan would continue to apply. (See Measures 4.5.1-4 as well as Measures 4.11.2-5.)

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

Discussion: The proposed Climate Action Plan would neither hasten nor impede land use and development changes anticipated in the General Plan EIR, which found that there could be significant and unmitigable impacts to historic resources if those changes resulted in the removal of historic buildings. The Climate Action Plan would itself not cause buildings to be removed or result in sub-surface excavation that might affect buried archaeological resources or human remains. Mitigation measures adopted as part of the General Plan would continue to apply. (See Measures 4.12.1-2.)

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
VI.	GEOLOGY AND SOILS. Would the project:				
	a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
	i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
	ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
	iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
	iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
	b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
	c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
	d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1997), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
	e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X

Discussion: The proposed Climate Action Plan would neither hasten nor impede land use and development changes anticipated in the General Plan EIR, which found that there could be significant and unmitigable impacts associated with exposing additional residents and employees to seismic events and other geologic hazards. The Climate Action Plan itself would not cause or exacerbate hazards. Mitigation measures adopted as part of the General Plan would continue to apply. (See Measures 4.10.1-4.)

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

Discussion: The General Plan Update EIR estimated GHG emissions associated with development in unincorporated Napa County during the life of the General Plan (2005 to 2030) by estimating emissions associated with population growth (about 246,557 MT), increases in vehicle miles travelled (about 380,459 MT), residential growth (43,392 MT), and non-residential energy use (162,473 MT).² The Final EIR's estimates of GHG emissions were gross and overlapping since emissions associated with population growth, necessarily includes emissions associated with vehicle miles travelled and building energy use. The proposed Climate Action Plan updates these

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

emissions estimates for the period between 2005 and 2020, and concludes that if no steps are taken (i.e. "business as usual"), unincorporated Napa County would emit a total of 499,832 MT of CO₂e in 2020, an increase of approximately 100,000 MT over 2005. This increase would be considered a significant impact requiring mitigation, except that the proposed Climate Action Plan proposes a suite of emission reduction measures to reduce emissions to approximately 338,404 MT by 2020. Thus, with adoption and implementation of the proposed Climate Action Plan – which is inherently mitigative -- the County would have addressed the significant impact. The County would also be taking steps to conform with State objectives articulated in AB 32.

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

Discussion: The proposed Climate Action Plan would not involve or stimulate the use or disposal of hazardous materials. Less than significant and significant and mitigable impacts identified in the General Plan EIR would not change and mitigation measures adopted as part of the General Plan would continue to apply. (See Measures 4.9.2, 4.9.4 & 4.2.2.)

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
IX.	HYDROLOGY AND WATER QUALITY. Would the project:				
	a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
j) Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X

Discussion: As discussed earlier, the proposed Climate Action Plan makes use of development assumptions from the General Plan EIR in its inventory of GHG emissions. The Plan would not, however, stimulate or impede development, so the impacts described in the General Plan EIR related to erosion, runoff, water supplies, flooding, and other hydrologic issues would remain as described in the earlier EIR. In addition, mitigation measures adopted as part of the General Plan Update would continue to apply. (See Measures 4.11.2-5 & 4.11.9.)

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
X. LAND USE AND PLANNING. Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X

Discussion: The proposed Climate Action Plan would obligate the County to undertake certain actions and would require applicants proposing discretionary projects to reduce the GHG emissions associated with their projects. None of these actions/requirements would result in land use changes or conflict with existing plans or policies, and the Climate Action Plan itself would be consistent with the County's General Plan. (In fact, it would implement a provision of the plan adopted as mitigation based on the analysis contained in the

General Plan Update EIR.) For these reasons, less than significant land use impacts would remain as described in the General Plan EIR, and mitigation measures adopted as part of the plan would remain in effect. (See Measures 4.2.1-2.)

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
XI. MINERAL RESOURCES. Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X

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

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

Discussion: The proposed Climate Action Plan would not change the nature, scope, or timing of development anticipated under the General Plan Update, and thus would not result in new noise impacts. The County's noise ordinance would continue to govern construction activities and ongoing operations, and the noise compatibility standards within the General Plan would continue to apply. These and other mitigation measures adopted as part of the General Plan would remain in effect. (See Measures 4.7.1-2, 4.7.4, & 4.7.7.)

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
XIII. POPULATION AND HOUSING. Would the project:				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X

Discussion: As stated earlier, the proposed Climate Action Plan would obligate the County to undertake certain actions and would require applicants proposing discretionary projects to reduce the GHG emissions associated with their projects. None of these actions/requirements would result in land use changes or stimulate population or job growth beyond what was anticipated in the General Plan Update EIR. Impacts would remain as described in the General Plan EIR, and mitigation measures adopted as part of the plan would remain in effect. (See Measures 4.3.1-2.)

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
XIV. PUBLIC SERVICES. Would the project result in:				
a) Substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X

Discussion: The proposed Climate Action Plan incorporates GHG emission reduction strategies associated with County operations which were previously identified in a report prepared by the Department of Public Works and their consultants. Some of these strategies may require modifications to existing County facilities, but there is no reason to believe that such modifications would result in new significant impacts. The Climate Action Plan would also not change development projections or the need for services anticipated by the General Plan EIR. Mitigation measures adopted as part of the General Plan would continue to apply. (See Measures 4.13.1.1, 4.13.2.1, 4.13.3.1, & 4.13.4.1.)

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
XV. RECREATION. Would the project:				
a) increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>

Discussion: The Climate Action Plan would not change development projections or the use of recreational facilities, although it is hoped that it will help to achieve a General Plan objective related to bicycle lanes. Mitigation measures adopted as part of the General Plan would continue to apply. (See Measure 4.13.9.1.)

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
XVI.	TRANSPORTATION/TRAFFIC. Would the project:				
	a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system and/or conflict with General Plan Policy CIR-16, which seeks to maintain an adequate Level of Service (LOS) at signalized and unsignalized intersections, or reduce the effectiveness of existing transit services or pedestrian/bicycle facilities?	<input type="checkbox"/>	<input type="checkbox"/>	X	X
	b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the Napa County Transportation and Planning Agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
	c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
	d) Substantially increase hazards due to a design feature, (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
	e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
	f) Conflict with General Plan Policy CIR-23, which requires new uses to meet their anticipated parking demand, but to avoid providing excess parking which could stimulate unnecessary vehicle trips or activity exceeding the site's capacity?	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
	g) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>

Discussion: The proposed Climate Action Plan contains a number of emission reduction measures that the County would use to achieve reductions in automobile traffic, thereby reducing GHG emissions. These measures involve changes to the County's parking standards (establishing parking maximums where relevant), planned transportation network improvements (e.g. extension of Devlin Road, more bicycle lanes), and less tangible efforts to encourage, stimulate, and support actions by the Napa County Transportation and Planning Agency (e.g. to improve transit), larger employers in the County (e.g. to implement commuter trip reduction programs), and land owners (e.g. to develop mixed use projects). Some of these actions may have physical environmental impacts that warrant site specific analysis when a specific location and design have been selected, however they are collectively considered to be actions that would reduce, rather than increase traffic, congestion related delays, and etc. The actions proposed are all consistent with policies contained within the Circulation Element of the County's General Plan, and would not significantly alter impacts identified in the General Plan Update EIR. In addition, mitigation measures identified in that EIR and adopted as part of the General Plan would remain in effect. (See Measures 4.4.1, 4.4.4, 4.9.4, & 4.13.1.1.)

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

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
b) Require or result in the construction of a new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
c) Require or result in the construction of a new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>

Discussion: The proposed Climate Action Plan contains a number of emission reduction strategies that would encourage the development and use of alternative energy systems (e.g. wind, solar), reduce solid waste, and encourage energy and water conservation. These measures could lead to the construction of some new facilities, but new facilities would be small, and would require permits from the County. In some cases, additional environmental review may be needed (e.g. for developing energy generation facilities at the landfill), but there is no reason to believe that there would be significant impacts. Mitigation measures adopted as part of the General Plan Update would continue to apply.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
XVII. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X

Discussion: The General Plan EIR examined potential cumulative effects within unincorporated Napa County by using reasonable projections of land use and development changes in the County between 2005 and 2030. It also considered the cumulative effects of the County's actions when combined with actions by other agencies. The Climate Action Plan does not alter this analysis and is itself intended to address GHG emissions from all sources within unincorporated Napa County. There is one class of "reasonably foreseeable" future projects that is not addressed by the Climate Action Plan, however, and that is projects to amend the County's General Plan. This is because the Climate Action Plan is an implementation action derived from the current General Plan, and utilizes projections and assumptions that were developed concurrent with the General Plan Update. The County is currently processing an application to amend the General Plan in a way that would allow a large mixed-use project at the Napa Pipe site. If this General Plan amendment is adopted (as

proposed or in a modified form), the Climate Action Plan would need to be reviewed and revised to reflect that amendment and the development that it would allow. The Draft EIR for the Napa Pipe project (SCH#2008122111, circulated for review October 2009) quantifies potential emissions from the project, and discusses emission reduction measures and alternatives that could be considered for adoption by the Board of Supervisors. It would be speculative at this point to predict the Board's ultimate decision about the project or related mitigation measures/alternatives. For this reason, and because the proposed Climate Action Plan contains a monitoring and adaptive management requirement ensuring that the plan would receive periodic reviews and would be amended, if needed, to address General Plan amendments, potential cumulative impacts are considered less than significant.