

3.0 COMMENTS AND RESPONSES TO COMMENTS

Letter 101

From: Allen Spence [mailto:spence_cdn@yahoo.com]
Sent: Friday, June 15, 2007 2:36 PM
To: Gitelman, Hillary
Subject: Response to the Draft General Plan

Hillary,
Hope all is going well.

I submitted SRA's response to the General Plan draft today.
I have attached a PDF so that the Map can be reproduced easily if needed.
I do not have Patrick Lowe's email.

I would like to add that I strongly believe SRA has offered a well thought out fair plan that is best overall for Napa County.
We did not ignore the core mission needs of PUC while reflecting the wishes of a large majority of Angwin residents.

If there is any need to clarify or expand on any detail in the response we will gladly do so.

Regards,
Allen Spence
707-965-2209

101-1P

SAVE RURAL ANGWIN

P.O. Box 222
Angwin, California 94508

June 15, 2007

Patrick Lowe
Department of Conservation, Development and Planning
County of Napa
1195 Third Street, room 210
Napa, California 94559

Re: Comments on Draft General Plan

Dear Mr. Lowe:

As you know, Save Rural Angwin (SRA) has followed the progress of the draft General Plan and has testified to your Committee on several occasions about development issues in Angwin. We also attended and spoke out at community meetings and forums on these issues. Our organization has numerous members who live and work in the Angwin area. While we applaud the recent changes that the Pacific Union College (PUC) has made to preliminary plans for lands which it owns in Angwin, we believe it is incumbent upon the county to adopt its own vision for Angwin, one that balances the needs of the PUC as well as the Angwin community, is consistent with the goals as expressed in the draft general plan and preserves the unique character of Angwin.

101-2P

Background

Angwin has long been recognized as a unique part of Napa County since even before the last comprehensive update of the county general plan that took place in the 1980s. The 1980s plan update was completed under the auspices of the Napa County Superior Court that determined that the previous general plan was not adequate. Both the County land use diagram and text were updated in response to the court's directive.

101-3P

Following adoption of the general plan, countywide rezonings took place to make the existing zoning consistent with the updated general plan designations. As you may know, state law requires that zoning and general plan be consistent with one another; and, importantly, the county is obligated to correct any inconsistency between the two if such is brought to its attention.¹

During the discussions about the extent and precise location of the Angwin 'urban bubble' much angst has been expressed by planning staff and the Steering Committee

¹ California Government Code Section 65860

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over which parcels are currently designated for urban uses and which are outside of the ‘bubble’. The non-parcel specific ‘bubble’ is a carry over from the way general plan maps were prepared in the 1980s when the county’s plan was last updated. In researching those 1980s era plans, we found that many used ‘the soft-line approach’ to delineate the boundaries between two different land use designations, especially when large areas were designated. These ‘soft-lines’ were then précised when the required zoning for consistency occurred. Rezoning took account of both the map and relevant policies to implement general plan designations in a meaningful way. The county used this approach when it did its zoning-general plan reconciliation in the 1980s. We have confirmed this in conversations with former county planning directors.

In the case of Angwin, the general plan ‘bubble’ was first précised when zoning was applied to individual parcels in the 1980s. The rezonings were guided by the general plan policy:

4.9 (a) The County will assume that the density of development in the Angwin Area precluded future subdivision activity based on septic tanks and wells. **The Angwin Urban area is Pacific Union College and adjacent commercial facilities** [emphasis added]

During the implementation phase of the General Plan, the small lots within the ‘urban bubble’ west of Howell Mountain Road were zoned for RS-B 5 acre to accommodate the existing lot pattern and the desire to preclude subdivision of these small lots as dictated by policy 4.9 (a). Some of the land owned by the PUC but not part of the College facilities was left in the AWOS (e.g. APN 024-430-022, 024-430-015) even though the parcel or portions of it were arguably within the ‘urban bubble’.

Before the current General Plan update, the last time the Angwin ‘urban bubble’ was reviewed was in 1997/98 in response to a request from PUC to update its master plan. The County conducted a thorough review of present and future land uses in relationship to the ‘urban bubble’ in Angwin. Staff recommended that those parcels or portion thereof that had a split designation AWOS/Urban and contained a college facility should be considered part of the urban bubble in Angwin.² The remaining areas should be retained or converted to AWOS.³ To that end, staff recommended that the existing residential enclave west of Howell Mountain Road currently zoned RS: B-5 should become AWOS since the majority of the land and homes are not owned by the College nor did that area contain any College facilities. Following a recommendation from the Planning Commission, the Board adopted a resolution amending the general plan to confirm that college-owned facilities considered vital to the operations of the College were within the Angwin urban area

There has been no review of the general plan for Angwin since the 1998 action.

² Department Report and Recommendation, General Plan Amendment #GPA-94-17, November 5, 1997

³ Ibid

101-3P
cont'd

While this historical recounting of how we got to where we are today may shed some light on how the county has previously determined which parcels are within the existing ‘urban bubble’, the general plan update gives us a new opportunity to focus on how our community should develop in the future. SRA believes the draft General Plan policy to “maintain Angwin’s rural setting and character” [LU-52] is the right vision for our community. We want to be sure that the “urbanized area” that will be shown on the county’s land use map for Angwin is consistent with this goal [LU-54]. SRA believes that our proposal will permit the PUC to carry out its primary mission to provide adequate educational and support facilities for its students and faculty pursuant to policy LU-57.

101-4P

The draft general plan invites the public to submit its own concept of future growth in the Angwin community. In response to your invitation (page 50), we offer our proposal for where future urban, non-agricultural uses and agricultural uses should be planned and located. This proposal is also submitted for your consideration pursuant to policy LU-54: to re-designate the existing, already developed, residential area of Angwin from its current AWOS to a Rural Residential designation.

Our Proposal

Our proposal mirrors the vision of the Board of Supervisors in 1998. We see no compelling reason to change that vision. It was the correct one for Angwin in 1998 and it remains so today. The Board made clear which lands were included in the ‘urban bubble’: existing college educational or utility facilities or the adjacent commercial facilities. Recognizing that housing is of critical importance to the College in attracting and retaining qualified professors and students, we are suggesting that the portion of the two parcels previously designated as potential housing sites by the County’s be included in the Angwin urban area even though portions of them are forested, vacant or underutilized.⁴ We also suggest that the County confirm the right of the College to retain and expand commercial uses in the parcel that contains the Angwin Plaza area to provide a source of revenue and services for the College and the community. We believe the attached proposal properly balances the needs of the College, the Angwin community and the county by providing housing sites, room for expansion of the College’s institutional uses, and opportunities for commercial uses within walking distance of both the College and future housing sites. Our proposal is consistent with proposed policy LU-53.

101-5P

In order to accomplish our objectives, it is necessary to re-define the intent and purpose of the ‘Public-Institutional’ (P-I) land use designation [Policy LU-48]. We think that an Institutional designation for PUC more accurately reflects the existing uses on the campus. Expanding the existing definition found in the draft General Plan could also encompass those uses that support the PUC, such as student and faculty housing. An additional benefit to the County is that the P-I designation could be applied to a variety of existing institutional uses such as the St. Helena Hospital in Deer Park. There is nothing residential about that major medical facility and it really deserves to be included in a designation more closely resembling its use and function. Similarly, existing farm

101-6P

⁴ Housing Element, Napa County General Plan, 2004, pages 11-4, 11-5

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worker camps operated under the auspices of public agencies may also be candidates for that designation. Schools such as Vichy and Mt. George Elementary and similar institutions could also be placed within this designation. Those use types could then be deleted from the Rural Residential (RR) designation, leaving it to apply strictly to those uses which are either residential or residential in nature, such as guest homes, day care centers and the like. We think that the county should use the opportunity presented by the general plan update process to examine its existing land use designations to bring them more into conformance with current use patterns. For clarity we have included a map in **Appendix A** and consider the map an integral component of this document.

101-6P
cont'd

Redefining the intent and purpose of both the P-I and the RR designation [Policy **LU-33**] to delete those uses that are not residential in nature would be the first step in implementing our proposal. The proposed P-I designation would be modified to incorporate the definition 'Institutional Uses' as contained in the glossary section of the draft General Plan.⁵ The attached map illustrates our proposal. Our proposed land use map allows for the continued expansion of College facilities where they are located now: east of Howell Mountain Road, within the 200-acre campus area. We propose to designate the PUC campus as 'Public-Institutional' with this expected change in definition and intent. Portions of the two College-owned parcels already recognized for their housing potential by the county as part of the adopted housing element would be designated 'urban residential'.⁶ The existing commercial center at Angwin Plaza and adjacent lands would have a land use designation reflective of their current use; i.e. Commercial. As these parcels are currently under utilized, commercial expansion in the existing parcel, to serve the needs of the College and the existing community has been provided.

101-7P

Consistency with Draft General Plan

Our proposal conforms to the fundamental principles that have guided the county land use planning program since the 1980s and is embodied in the present draft General Plan: preserve existing agricultural land use [**LU Goal 1**] by concentrating non-agricultural land uses in existing urbanized or developed areas [**LU Goal 3; LU-20**]. Locating urban uses within already developed or cleared areas protects the county's agricultural lands. Locating future urban uses within the designated urban residential (UR) areas, where growth has historically occurred, will retain Angwin's rural setting by avoiding designated agricultural lands which are heavily wooded [policy **LU-58**], providing land for commercial services within the existing commercial area [policy **LU-52**], and supporting the continued operation of PUC by allowing for future development of lands which it owns [policy **LU-52**]. The 'urban' area that we propose will allow for expansion of college classrooms, administrative and related facilities on the 200-acre campus, the development of the 191 units of housing on college-owned lands contemplated by the county's adopted housing element, and the development of additional commercial opportunities within the Angwin Plaza parcel.

101-8P

⁵ Napa County General Plan Public Review Draft @ page 288

⁶ The portions of these two parcels designated as potential housing sites by the county total approximately 16 acres

In addition to consistency with the fundamental planning principles that have guided this County since the last comprehensive General Plan update, our proposal makes good planning sense and furthers other land use goals recommended in the current draft:

- Adequacy of Services. Lands designated for urban uses by our proposal are owned by the PUC. As such, each is eligible for water and sewer services from the College owned and operated water and sewage treatment plants. We would note that, as a private water company, the Pacific Union College Water Company PUCWC is prohibited from providing water service to parcels other than those owned by the College. According to the environmental assessment adopted in conjunction with the county’s housing element, (PUCWC) has the capacity to deliver 1.2 million gallons per day (gpd), and currently uses a maximum of 0.7 million gpd under peak conditions.⁷ Water from the PUC system is currently available to serve all the parcels proposed to be included in the Angwin urban area. Thus, it would not be necessary to extend urban services to parcels outside the existing service area and no new special districts would need to be formed [policy LU-23]. Approval of an expanded urban area to include parcels not currently eligible for service by the PUCWC would require the creation of a new special district, an action contrary to proposed policy LU-24. Defining the Angwin urban area to include college-owned parcels where urban services are available would eliminate the need for septic tanks, thus protecting water quality [policy LU-55]
- Circulation. Currently, Howell Mountain Road within Angwin is a lightly traveled arterial that is primarily used by local travelers. South of the community, the road takes on a very different complexion—steep and windy, and often icy in the winter. It is not suitable for much additional traffic, nor can it be improved without significant environmental consequences. As such, SRA believes that Angwin must be a balanced community where jobs and housing are in balance, where commuting to areas outside of the community is discouraged. Our proposal accomplishes these objectives by providing for both reasonable growth in housing and commercial opportunities in a scale consistent with the level of services available. Concentration of urban uses within the areas shown on our proposal will allow future residential and educational growth to be located within walking and bicycling distance of existing commercial center. In a recent article in the Napa Valley Register, a spokesman for the Napa County Transportation Planning Agency (NCTPA) noted that currently only 4 percent of county residents walk to work and 2 percent bicycle.⁸ One goal of the NCTPA is to improve these percentages.⁹ Promoting compact growth proximate to services is a ‘smart growth’ idea, consistent with this goal as well as the goals of the draft General Plan to reduce the dependency on the automobile [policy CIR-1.3]. Reducing automobile use will result in improved air quality [policy CON-46], reduced traffic noise and energy use [policy CON-60].

101-9P

101-10P

⁷ Ibid

⁸ ‘Leaning toward another roadwork tax’, Napa Valley Register, May 19, 2007.

⁹ Ibid

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- **Preservation of Existing Landscapes.** The lands suggested for urban uses are presently the site of existing college facilities or commercial uses. The proposed urban area avoids those PUC lands that are heavily forested north and east of the campus. The existing forest provides an essential part of the identity of Angwin. Preservation of forested lands retains groundwater upon which the community of Angwin depends for its drinking water, moderates our local climate, and provides flood control, recreation and wildlife habitat. Preservation of forests is one of the principal open space and conservation goals of the draft General Plan [policy **CON-1**]. We strongly support this goal. Forested parcels should not be designated for urban uses—those parcels should be clearly designated for non-urban uses in the final General Plan diagram. Concentration of future urban growth within the area identified in our proposal will preserve existing forested lands which are essential to the natural beauty of our community.

101-11P

In summary, Angwin is a unique part of Napa County. Angwin warrants a set of clear goals and policies that will guide its future. We applaud the county's invitation to be a part of that process through the filing of our proposed land use map. We strongly support a limited urban area as we have described it in this letter and accompanying map. The proposal that we have put together reflects the desires of many existing members of the Angwin community who share the same vision: preservation of Angwin's unique rural forested setting and character while still providing opportunities for the PUC to fulfill its mission as one of the premier educational institutions in the western United States. Our proposal also provides for future housing opportunities for students and faculty as well as current and future commercial opportunities for the entire community. SRA believes that the county should proceed cautiously in Angwin—there is little need to increase the speculative value of lands outside of the PUC core campus for uses unrelated to the educational mission of the college. Growth in Angwin must be balanced against other areas of the county where growth is closer to population centers where roads, schools, services and jobs are more readily available. Once our forests are converted and our roads become congested the forests are gone and more pavement will not relieve the problem. If in the future such lands are seen as desirable for additional growth opportunities, they can be reexamined as part of a future general plan update.

101-12P

Recommendations for Additional Changes to General Plan

While to most people, the General Plan map is the most important component of a general plan and where the greatest changes to the existing landscape will be evident, SRA believes that the goals and policies must also be examined to be sure that they too support the vision of any adopted map. To that end, we offer the following suggestions.

101-13P

We are disappointed that the policies related to Angwin do not include a strong policy to support the preservation of the forested and agricultural lands that are the most important physical characteristic of the community and serve as the most important component of its rural setting. While the county sets a countywide policy of retaining the character and natural beauty of Napa County [policy **CC-1, CON-1**], SRA strongly believes the section

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on Angwin must contain clear policy protecting the forested and agricultural lands in and around the community. | 101-13P
cont'd

SRA is very concerned about policies in the draft circulation element that allow for significant increases in traffic over the life of the plan. While according to the draft EIR, Howell Mountain Road is currently operating at LOS 'A'¹⁰ [Free-flowing travel with an excellent level of comfort and convenience and freedom to maneuver], under draft policy **CIR-2.5**, traffic flow on Howell Mountain Road could decrease from LOS 'A' to LOS 'D' [users experience severe restrictions in speed and freedom to maneuver, with poor levels of comfort and convenience] and still be considered acceptable to the county. This degradation of service may well be acceptable to the county, but it is unacceptable to us. And it serves to put future developers on notice that a large increase in residential and commercial related traffic is OK. It is not! Howell Mountain Road is physically constrained by significant vegetation and slope and cannot be widened without severe environmental consequences and impacts on our quality of life. We will not accept a LOS below 'B' on the roads in our community. SRA wants Howell Mountain Road to be included on the list of roadway entrances where capacity will not be increased [policy **CIR 2.2**]. We want to maintain our superior air quality and road systems as safe for the many bicycle riders and pedestrians who use them. | 101-14P

Similar to the policies on circulation, the draft general plan section on noise does not recognize the unique noise environment that exists in the Angwin community. We currently experience a very low ambient noise level and want to maintain that in the future. The draft general plan section on noise contains no policies to protect those portions of the county that currently have low ambient noise levels. Rather, policies such as policy **CC-38 & 40** would allow significant increases in ambient noise so long as they can be mitigated. This policy will lead to such unsightly structures as sound walls and walls built without windows. SRA strongly recommends specific policies within the section on Noise Goals to protect those areas of the community that currently experience low ambient noise levels. | 101-15P

¹⁰ Napa County Draft Environmental Impact Report, Volume 1, February 2007, page 4.4-8, Table 4.4-3

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Comments on Draft Environmental Impact Report (EIR)

While SRA acknowledges the role of the draft EIR as a programmatic document that cannot be used to determine specific impacts on specific areas of the county, we must for the record note that the nature of the conclusions are of great concern to us. Our concern is that the alternatives analyzed in the draft EIR are growth-oriented and that, by including the Angwin area under Alternatives B and C, the real impacts of future growth in Angwin are diluted. Currently the draft EIR that includes expansion of the Angwin urban area (Alternative C) does not include a projection of any proposed improvements or treatment capacity upgrades to the existing treatment plant operated by the PUC. Nor does the EIR analyze the ability of the existing treatment plant to adequately treat sewage from an expanded urban area. Despite this lack of information, the draft EIR concludes that impacts of Alternative C can be mitigated.¹¹ We don't believe that sufficient analysis has been included in the EIR to reach that conclusion.

101-16E

The real impacts of future growth in Angwin even under Alternative B are not clear. The draft EIR contains no analyses of the available capacity of either water or sewer services. It doesn't address how much water is available under currently conditions? How much water is available for future growth? How many square feet of commercial use or residential units can be accommodated? Is there water and sewage treatment available for the growth scenario under Alternative C? How will such growth scenarios impact local groundwater that is essential to the existing and proposed agricultural uses in the area upon which our county depends?

The analyses do conclude that growth projections under Alternatives B & C are in many cases significant and unmitigatable.¹² We understand the role of the EIR as a disclosure document. We are very concerned that since adoption of the General Plan in a form anything like the one proposed will require the county board of supervisors to adopt findings of overriding considerations under either Alternative B or C, future applications for projects enabled by the general plan will be able to rely on the certified EIR for their projects without any real analysis being done. Given the very limited information on how alternatives B & C affect traffic, water, sewage, water and air quality in the Angwin community, this finding will severely limit our ability to comment on future projects.

101-17E

We respectfully request that the County support our proposal.

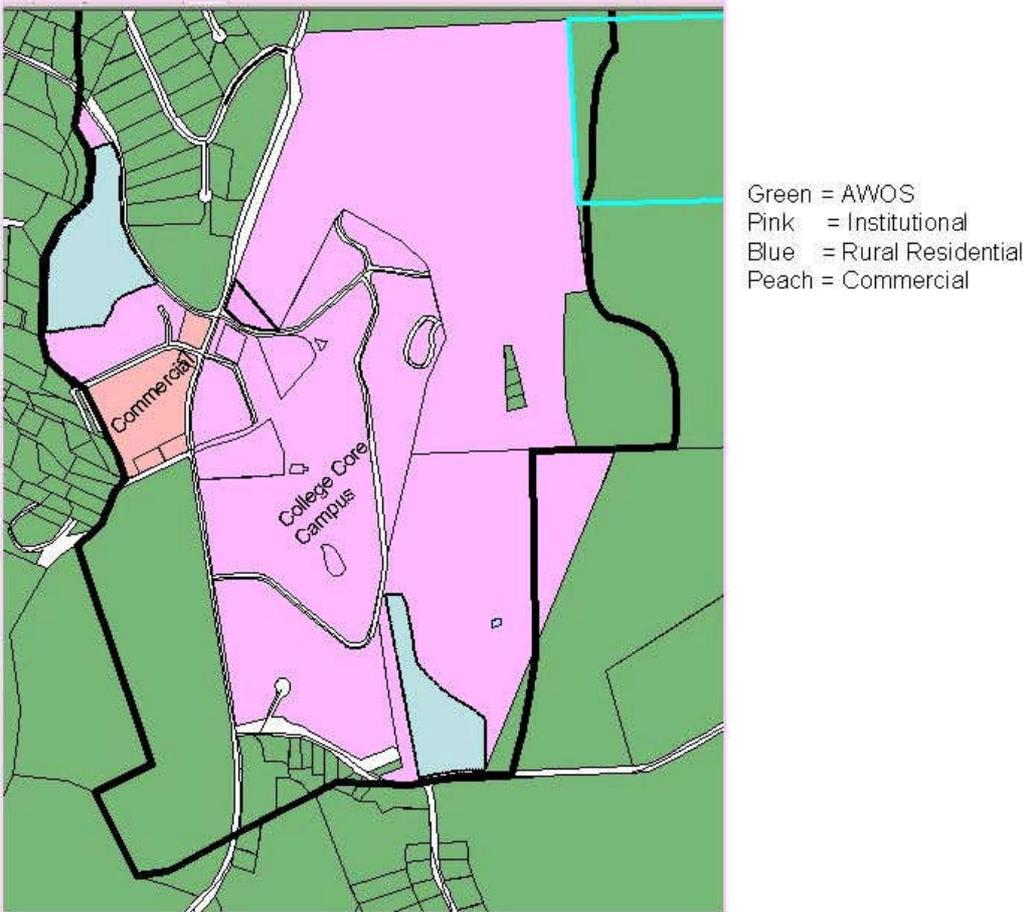
Sincerely,

Allen Spence
On behalf of Save Rural Angwin

¹¹ Napa County draft General Plan Environmental Impact Report, volume 1, page 4.13-55

¹² For example, impact 4.3.1, 4.4.1, 4.7.3, 4.7.4, 4.8.1, 4.11.5

Appendix A



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- LETTER 101: ALLEN SPENCE ON BEHALF OF SAVE RURAL ANGWIN, JUNE 15, 2007
- Response 101-1 P:* Commenter asserts that the proposal provided by Save Rural Angwin (SRA) is well thought out and fair. The commenter's statement associated with this topic is understood.
- Response 101-2 P:* Commenter states SRA is supportive of recent changes made by Pacific Union College (PUC) to their preliminary plans for PUC lands. Commenter believes it is incumbent on Napa County to adopt a vision for Angwin as well. The proposed General Plan Update has been revised, and the section on Angwin beginning on page 43 of the Revised General Plan Update is intended to do just that. The proposed plan (described as the "Preferred Plan" in Section 2.0 of this FEIR) removes areas currently zoned for agricultural use from the "Urban Residential" designation (i.e., the Angwin "bubble") and suggests policies aimed at retaining the community's rural character while not precluding future development that is appropriate to the setting
- Response 101-3 P:* Commenter presents a history of Angwin, the urban bubble, and past planning efforts undertaken of and for PUC. The County appreciates the information provided by the commenter.
- Response 101-4 P:* Commenter states support for the vision of retaining Angwin's rural character (Policy LU-52) and requests assurance that the outcome of the "invitation" posed by Policy LU-54 will be consistent with the vision of LU-52. Commenter states that the proposal by SRA would be consistent with this vision and with Policy LU-57 about the role of PUC. County staff appreciates the commenter's thoughtful proposal and has revised the Angwin section of the document in a number of ways based on the commenter's comments and others. The Land Use Map has also been modified, and the map of Angwin included on p. 43 of the Revised General Plan Update is an inset map from Figure Ag/LU-2 (County Land Use Map). The Angwin map shows that agriculturally zoned parcels would be removed from the UR area and re-designated as AWOS, and that the currently developed area of Angwin may be considered for addition to the Rural Residential area pursuant to a Measure J vote sometime in the future.
- Response 101-5 P:* Commenter asserts that the vision for the Angwin Community provided by the Board of Supervisors in 1998 is the "correct" vision and that the SRA proposal is consistent with that vision even though it includes a different map than the one adopted by the Board in 1998. Commenter suggests that the two parcels previously designated as potential housing sites be included in the Angwin urban area. Commenter also asks that the County confirm the right of PUC to retain and expand commercial uses in the existing commercial area. Commenter states that the SRA proposal balances the needs of PUC, the Angwin community, and the County and that the proposal is consistent with Policy LU-53, which defines the contents of Angwin's "urbanized area." The commenter's statements associated with this issue are understood. See Response 101-4 above.

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- Response 101-6 P:* Commenter suggests that it is necessary to redefine the intent and purpose of Public-Institutional (P-I) land use designation (Policy LU-48) to encompass PUC as well as those land uses that support PUC such as student and faculty housing. Modification of the P-I use, the commenter states, would allow other such uses to be designated P-I, freeing up the Rural Residential (RR) use to be applied to only residential uses and those with significant residential aspects (e.g., guest homes, day care centers, etc.). County staff appreciates the commenter's suggestions and has made many changes related to Angwin in the Revised General Plan Update. However, the County has declined to re-designate private institutions such as the PUC as suggested. Such a change would necessitate re-examination of other areas of the County and many sections of the General Plan, and County staff believes that fine-tuning the Angwin map and policies to better reflect the community's vision can be accomplished without this change.
- Response 101-7 P:* Commenter states that redefinition of the P-I designation (see Response 101-6 P) should be modified to incorporate the definition of "Institutional Uses" as shown in the General Plan Glossary. Commenter provides alternate land use map, which allows for expansion of PUC facilities where currently located, the designation of PUC as "P-I", and the designation of two PUC-owned parcels as Urban Residential. The commenter's statements associated with this issue are understood – see Response 101-6 above. If the commenter's objective is to fine tune the suggested policies to better reflect the community's vision for Angwin, County staff believes there are a variety of ways to do this in addition to the one suggested by the commenter. (See the Revised General Plan Update, for example.) If the commenter's objective is to preclude PUC's proposed development proposal in Angwin, they should direct their comments to a separate planning process now under way to analyze the impacts and benefits of that proposal.
- Response 101-8 P:* Commenter notes that the SRA proposal conforms to the fundamental principles guiding County land since the 1980s, as well as to LU Goal 1, LU Goal 3, Policy LU-20, Policy LU-58, and Policy LU-52. Commenter states that SRA's proposed "urban" area would allow for expansion of PUC classrooms, administrative and related facilities, the development of campus housing, and the development of commercial opportunities within the Angwin Plaza parcel. The commenter's statements associated with this issue are understood. See Response 101-6 and -7 above.
- Response 101-9 P:* Commenter notes that PUC may not provide water service to parcels not owned by the college and that approval of an expanded urban service area would require the formation of a special district, contrary to Policy LU-24. Commenter states that the SRA proposal would ensure adequate services to the urban area while protecting water quality. County staff acknowledges the commenter's proposal and concern related to wastewater treatment and public services. The Revised General Plan Update reduces the size of the "urbanized" area in Angwin and is similar to the SRA proposal in this way. Also, please note that the General Plan (existing and proposed) and County ordinances would preclude any development in Angwin without adequate wastewater treatment

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facilities, and suggest that sewage treatment rather than septic tanks are the appropriate approach in Angwin (Policy Ag/LU-60 in the Revised General Plan Update). Also, the County has not proposed formation of a special district to provide sewer services in Angwin; however the General Plan would not preclude establishment of such a district if needed in the future. (Policy AG/LU-25 would prevent the establishment of special districts outside of "already developed areas," but not within designated urbanized areas such as Angwin.) Please also see Section 14.13.4 in the Draft EIR regarding sewer services in the County and the mitigation measure (MM 4.13.4.1) provided at the end of this analysis and included as Policy CON-62 in the Revised General Plan Update.

Response 101-10 P: Commenter states that Howell Mountain Road is not suitable for much additional traffic and cannot be improved without significant environmental consequences. Commenter further states that SRA's proposal would allow for compact growth in Angwin, reducing the expected increase in traffic on Howell Mountain Road, consistent with Smart Growth ideas. County staff acknowledges the commenter's support for urban-centered growth and compact development that supports the use of alternative modes of transportation. As explained in Section 4.4 of the Draft EIR, traffic volumes on County roads, including Howell Mountain Road, are expected to rise in the future whether or not the General Plan is updated, and this increase in traffic volumes will impact County roads. (See Draft EIR p. 4.4-46 et seq.) Also, as shown in the Circulation Map on p. 105 of the Revised General Plan Update, no expansion of Howell Mountain Road is expected or planned in the General Plan Update, precluding any environmental consequences from expansion of the roadway.

Response 101-11 P: Commenter agrees with the need to preserve the existing landscape through implementation of Policy CON-1. Commenter states that the SRA proposal would allow for the continued undeveloped state of forested lands owned by PUC, further promoting the goals of CON-1. The commenter's statements associated with this issue are understood. The Revised General Plan Update removes agriculturally-zoned land (some of it forested) from the Urban Residential designation in Angwin.

Response 101-12 P: Commenter notes that Angwin warrants a set of clear goals and policies. Commenter summarizes the benefits of SRA's proposal. Commenter states that growth in Angwin must be balanced against other areas of the County where growth is closer to population centers with established infrastructure. The commenter's statements associated with this issue are understood. The County agrees that Angwin "warrants a set of clear goals and policies that will guide its future" and believes that the Revised General Plan Update provides such goals and policies without "increasing the speculative value of lands outside of the PUC core campus." The Revised General Plan Update would reduce the amount of land designated for urban uses outside the core campus, while not precluding the PUC some use and development of its land within areas zoned "Planned Development."

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- Response 101-13 P:* Commenter notes a strong policy is required to support preservation of forested and agricultural lands in and around the community of Angwin. As noted above in Response 101-11, Goal CON-1, Policy CON-1, and several other policies (see Policy CON-18) in the Conservation Element provide for the preservation of forested and agricultural lands within the unincorporated County. Also, Policy Ag/LU-64 acknowledges Angwin's wooded setting as contributing to the community's character.
- Response 101-14 P:* Commenter states that a minimum of LOS D on roadways in and around Angwin is unacceptable (Policy CIR-2.5). Commenter requests that Howell Mountain Road be included in Policy CIR-2.2, preventing any increase in capacity for that roadway. Policy CIR-2.2 applies specifically to "gateway" roadways that enter Napa County from other communities, stating that the capacity of these roadways should not be expanded. As Howell Mountain Road does not provide connections between Napa County and outside communities, staff does not recommend including Howell Mountain Road in this policy. Nonetheless, according to the Circulation Map in the Revised General Plan Update, Howell Mountain Road is not planned for expansion. Draft EIR Section 4.4 identifies increases in traffic volumes on many County roads, many of which would happen regardless of whether or not the County's General Plan is updated. (Draft EIR Alternative A represents what is expected to occur with no substantive changes to the County's land use policies.) Policies in the Circulation Element address transportation issues and are intended to prioritize traffic safety and accessibility in areas where roadway capacity increases would not occur.
- Response 101-15 P:* Commenter notes that noise policies do not recognize the unique ambient noise environment in Angwin. Commenter requests that policies be developed to prohibit the generation of significant noise, even if mitigated, in areas of low ambient noise, such as Angwin. Napa County implements a detailed noise ordinance. Noise goals, policies, and standards for interior and exterior noise levels pertinent to the generally rural lifestyle of Napa County are included within the Community Character Element. Policies in the Noise section of the Community Character Element focus on land use compatibility as it relates to noise. Thus, policies would tend to discourage new noise generators in areas where sensitive land uses exist and ambient noise levels are low. They would also tend to discourage new sensitive land uses where noise levels are high. This is a standard approach to noise issues and does not reflect a change in policy from the current General Plan.
- Response 101-16 E:* Commenter suggests that the Draft EIR alternatives are "growth oriented" and that "impacts of future growth in Angwin are diluted" by including growth assumptions in Alternatives B and C. Commenter also expresses concern regarding the Draft EIR's assessment of wastewater treatment and the conclusion that impacts related to the expansion of wastewater capacity and infrastructure in Angwin under Alternative C could be mitigated. The Draft EIR appropriately considers a range of alternatives, including smaller alternatives (Alternatives A and Alternative D). The Revised General Plan Update presented in this final EIR as the "Preferred Plan" is projected to result in growth similar to Alternative A. Please see

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Alternatives Master Response 3.4.2 for more discussion of the EIR alternatives. The Draft EIR also appropriately assesses the need for public services at a programmatic level, suggesting that additional site-specific analysis will be required when individual development projects are proposed. The analysis concludes that Alternative C would result in a significant increase in need for wastewater treatment and conveyance capacity, and concludes that this potentially significant impact can be mitigated with implementation of mitigation measure MM 4.13.4.1, which requires that adequate capacity is ensured during the review of any future development projects. Thus, any specific development proposed in Angwin will have to be assessed to determine its wastewater treatment needs, and at that time the County will have to analyze whether the proposal's needs are met, and whether there are secondary impacts associated with any infrastructure upgrades that might be required.

The commenter also states concerns as to the future water supply required to meet the growth predicted under Alternatives B and C. Commenter is referred to the Water Supply Master Response 3.4.1 of this Final EIR for additional discussion regarding water supply and Section 2.0 of this document for analysis of the Preferred Plan.

Response 101-17 E: Commenter notes that several impacts related to growth projections under Alternatives B and C are significant and unmitigatable. The commenter notes this finding will severely limit the ability to comment on future projects. According to State CEQA Guidelines, Section 15183(a), future development projects which are consistent with the development density established by a general plan must be analyzed to determine whether there are project-specific significant effects which are peculiar to the project or its site. As such, future projects will not be exempt from future analysis.

Letter 102

Alvin Lee Block, MD, FACP, LL.B
931 Marina Drive
Napa, CA 94559-4744

Telephone (707) 257-6023 blocklm@napanet.net

16 June 2007

Patrick Lowe
Deputy Planning Director
Napa County Planning, Development, and Conservation Department
1195 Third St., Suite 210
Napa, CA 94559

RE: Comments on General Plan

Dear Mr. Lowe:

Thank you for the opportunity of commenting on the draft General Plan for Napa County.

The draft document is commendable and reflects an enormous amount of work. For purposes of this letter, my particular interest are the arts activities available to the public. In this regard, I hope the General Plan committee will consider what I feel is an inadequate amount of attention given arts and cultural programs in the present draft. If my survey is correct, the importance of tourism is noted (Community Character, page 142) but without mention of the role of arts and culture. Under the heading of Napa County's Economy, a stated goal is to develop and promote a diversity of business opportunities, but there is no discussion of policies designed to accomplish this goal

102-1P

The benefits accruing from intensifying our support of the arts and cultural community in the general plan are primarily two fold. The spiritual and quality of life attributes relating to the Arts and Cultural community are well known and universally acknowledged as essential elements in the life of healthy, vital communities. This theme applies not only currently throughout the country and western world but also historically in the great flourishing, prosperous, progressive centers of the world over the ages. Less well known are the enormous economic benefits: A few examples include Sacramento Jazz Festival, 100,000 attending with an estimated 20,000,000 boost (Steve Hammond, president of the Sacramento Convention & Visitors Bureau.), the Monterey Jazz festival attracting 40,000 enthusiasts from September 21-23, and the San Diego Street Scene Festival hosting 55,000 visitors September 7-9. In Ashland, Sonoma's summer jazz festival, Santa Rosa's program department, Sacramento's summer jazz concerts we see surrounding communities seizing on this trend.

102-2P

It has become increasingly evident in recent years that private philanthropy cannot dependably provide the needed funds for the Arts. I therefore hope that the General Plan committee will consider these modifications:

1) The statement dealing with arts in economic development should be strengthened to reflect the substantial and growing importance to Napa Valley of the arts, especially in light of the spiraling contribution of the visitor industry to our economy as our river project moves toward completion.

102-3P

2) A direct comment on the appropriateness of using dedicated public funding, utilizing the Arts Commission and the Arts Council of Napa Valley as a vehicle to accomplish these goals, as a prudent investment in our county's future.

102-4P

Thank you again for the opportunity of submitting these remarks.

Alvin Lee Block, MD

3.0 COMMENTS AND RESPONSES TO COMMENTS

In STUDY ITEM	LOCATION IN GENERAL PLAN	COMMENTS, SUGGETIONS, AND RATIONALE	
Community Character	Page 135	Deals extensively with issues such as land aesthetics, scenic highways, noise, and odors, but fails to mention the role and importance of the Arts and Culture in quality of life and in the economy of the county although the latter is touched briefly under Economic Development	102-5P
<u>Goal:</u>		No goal is stated. Recommend that a more comprehensive statement be inserted, emphasizing the two major contributions of a vibrant Arts/Cultural Community: (a) The unquestioned importance of arts and cultural activities in the long term health of a community, a spiritual and quality of life issue. (b) The growing awareness throughout this country and the western world of the power of art to impressively enhance economic vitality in the business community. Currently, Napa's deficiency in facilitating this goal is an <u>ongoing public commitment</u> to reliable, sustainable support for our Arts and Culture community, including public art as well as the conventional visual and performing arts.	102-6P
<u>Policy:</u>		No policy is given. Recommend a strong statement expressing the need for (a) active support of the Arts Commission and the Arts Council of Napa Valley for purposes of planning and disseminating information to both the visitor population and local citizens, and (b) specific means of encouraging the use of <u>regularly, permanently committed public funds</u> to a broad spectrum of County arts and cultural activities, including planning, contact with the visitor industry, festivals, exhibitions, public art, and Napa as an arts destination.	102-7P
Napa County's Economy	Page 219	Two important observations are made: (a) "Napa County's economy is based on agriculture, and in particular a highly specialized form of agriculture: grape-growing and wine-making" and (b) "Visitors to Napa tend to be mature, educated, and wealthy..." Both statements speak to the relevance of Arts and Culture to Napa County because (a) arts fit seamlessly and naturally into our economy (above), a natural companion to wine and good food, and (b) these are precisely the kinds activities which visitors of the above description aggressively seek because the arts are so much a part of their life and so appealing to them.	102-8P
<u>Goal: E-2</u>	Page 225	"Develop and promote a diversity of business opportunities" The arts can contribute in a major way to this goal not only through their attraction for visitors to the valley but also through the multiplier effect which is very substantial.	102-9P
<u>Policies E6:</u>)	Page 225	"The County encourages a healthy and thriving arts, recognizing that it enhances the aesthetic appeal of Napa County, enriches the quality of life of all residents, and contributes to a vital economy" This statement is commendable but should be accompanied by more specific recommendations such as the need for some degree of committed public support in the form of public funding.	102-10P
Community Character	Page 142		
Goal CC-3:	Page 155	CULTURAL RESOURCES GOALS: "Identify and preserve Napa County's irreplaceable cultural and historic resources for present and future generations to appreciate and enjoy." The point made was in terms of historic visual sights, but I wonder if the aim doesn't apply to institutions such as our museums.	102-11P
<u>Policy CC-22:</u>	Page 157	Stated policy: "Promote the County's historic and cultural resources as a means to enhance the County's identity as the Nation's premier wine country and a top tourist destination, recognizing that "heritage tourism" allows tourists to have an authentic experience and makes good business sense." This is an excellent summary of what the arts can do so effectively and so uniquely, in conjunction with wine, food, the river, and Napa branding. I think it deserves more deliberate emphasis.	102-12P

3.0 COMMENTS AND RESPONSES TO COMMENTS

LETTER 102: ALVIN LEE BLOCK, MD, JUNE 16, 2007

- Response 102-1 P:* Commenter notes an inadequate amount of attention to arts and cultural programs in the draft General Plan. The commenter states that while tourism is discussed, the role of arts and culture is not mentioned in relation to tourism. Likewise, the commenter states that there is no discussion of policies to further the goal of promoting a diversity of business opportunities. The commenter's statements associated with this topic are understood. Since release of the public review draft of the proposed General Plan, additional language, goals, and policies have been incorporated into the Community Character Element that emphasize the role of arts and culture in relation to business and visitors to the County.
- Response 102-2 P:* Commenter notes that there are both quality of life and economic benefits from intensifying support for the arts and cultural community. The County appreciates the commenter's input on this topic, and a reference to the arts and a related policy has been added to the Community Character Element.
- Response 102-3 P:* Commenter suggests strengthening the statement in the Community Character Element regarding arts in economic development to highlight the increasing importance of arts to the Napa Valley. A reference to the arts has also been added to the Economic Development Element.
- Response 102-4 P:* Commenter suggests the Community Character Element should include a direct comment on the appropriateness of using public funding to accomplish the goals outlined by the commenter. The County appreciates the commenter's input on this topic. However, this change has not been made to the policies in the General Plan Update, since general plans are land use policy documents that do not typically address public funding issues.
- Response 102-5 P:* Commenter notes the Community Character Element on page 135 fails to mention the role and importance of arts and culture. Commenter notes the presence of such language under Economic Development. Please see revisions to the Community Character Element.
- Response 102-6 P:* Commenter notes that no goal is stated supporting arts and culture in the Community Character Element on page 135. Please see new Goal CC-3 on p. 129 of the Revised General Plan Update.
- Response 102-7 P:* Commenter notes that no policy is stated supporting arts and culture in the Community Character Element on page 135. See revisions to the Community Character Element.
- Response 102-8 P:* Commenter notes that statements made in the Napa County's Economy section regarding the primary economic basis (grape-growing and winemaking) and the character of tourists to the County (mature, educated, wealthy) fit with the commenter's goals of incorporating arts and culture into the document, as these industries and tourist groups benefit from and appreciate arts and culture. The commenter's statements associated with this topic are understood.

3.0 COMMENTS AND RESPONSES TO COMMENTS

- Response 102-9 P:* Commenter notes that the arts can contribute to Goal E-2 of the Economic Development Element. The commenter's statement associated with this topic is understood.
- Response 102-10 P:* Commenter notes that Policy E-6 should be accompanied by specific recommendations for public funding for arts programs. The County appreciates the commenter's input on this topic. However, this change has not been made to the policies in the General Plan Update.
- Response 102-11 P:* Commenter suggests that Community Character Element Policy CC-3 apply to museums as well as other cultural and historic resources. The County appreciates the commenter's input on this topic. However, this change has not been made to the policies in the General Plan Update since this was not the intent of the referenced policy, and Planning staff is uncertain about the need for or wisdom of a separate policy supporting all museums without exception.
- Response 102-12 P:* Commenter suggests that Community Character Element Policy CC-22 include more deliberate emphasis of the role arts can play in the promotion of the goals of the County. The County appreciates the commenter's input on this topic. Please see new Policy CC-7.

Letter 103

Date: June 4, 2007

To:
Patrick Lowe, Deputy Planning Director
Napa County Office of Conservation, Development & Planning
1195 Third St., Suite #210
Napa, CA 94559

From:
Paula J. Peterson 
P.O. Box 296
Angwin, CA 94508

Subject:
Draft EIR Comments

Re: EIR Alternatives Development Assumptions (Attached)

Development program assumptions for Angwin may have been formulated without benefit of "on the ground" site planning. This, along with environmental concerns and Smart Growth principals, could significantly alter conclusions that have been drawn in this document about net developable area/units allowable in Angwin. It is not clear to me how all of the 0 s.f. and 0 jobs equate to total du and jobs/population in the Plan Alternatives.

103-1E

3.0 COMMENTS AND RESPONSES TO COMMENTS

DRAFT NAPA COUNTY GENERAL PLAN EIR VOLUME II: TECHNICAL APP'S

SECTION VI. EIR ALTERNATIVES DEVELOPMENT ASSUMPTIONS

In order to analyze the Napa County General Plan EIR scenarios, KMA organized the alternatives and sites in the matrix shown in Table VI-1, presented in five pages. A development program was articulated for each individual site and each scenario.

The major assumptions and procedures used in the identification of development programs are described below. Further details are elaborated in extensive footnotes following the tables.

- **Gross versus Net Acres.** For industrial and/or commercial uses, site areas were expressed in gross acres. It was then assumed that 10% of the site would be utilized for major circulation and infrastructure, reducing buildable land area to 90% of the total available land. The ratio of net to gross for residential was not fixed, but depends on the site and scenario. In some (e.g. Napa Pipe in Alternative C, which would be affected by airport flight paths and need buffers from industrial uses), net buildable acres could be as little as 50% of total available land.
- **Industrial Land Use Distribution.** Non-residential land was distributed by building type depending on the Alternative Scenario concept. Four alternative mixes of land use and building type were identified and applied to the Alternatives as indicated below.

Acreage in each site was allocated to Manufacturing, Warehouse, Office/R&D, Retail and Other uses. Alternative E added Expo and Conference Center uses which include Commercial and Hotel. The "Other" category covers wineries and vineyards. Consistent with the concept and the unique characteristics of each site, the distributions were applied as follows:

	1 (Alt A: A.I.A.; Alt E: Hess Vineyard, Hess Environs)	2 (Alt A: Napa Pipe, Pacific Coast/BOCA; Alt D: Pacific Coast/BOCA)	3 (Alt B: Napa Pipe)	4 (Alt D: Napa Pipe)
Manufacturing	15%	30%	25%	25%
Warehouse	70%	45%	20%	75%
Office/R&D	15%	25%	55%	0%

The first distribution reflects the existing land use mix in the A.I.A., which is expected to continue on the Hess sites. Distribution 2 is adjusted to be more reflective of the Napa Valley Corporate Park and extension of Napa City in Alternatives A and D. Distribution 3 is further adjusted to allow a commercial mixed-use business park in Alternative B. Distribution 4 reflects a building mix for a large distribution and warehousing complex.

- **Intensity, Density, and Development.** Floor area ratios, or FARs, measure the relationship of building area to site area. FARs vary by land use and building type, as presented previously. As presented in Sections I through IV, FARs in the industrial areas

are expected to continue intensifying from the low current level in the A.I.A. to more traditional industrial park densities, and closer to those permitted under current zoning. The FARs used to identify the development programs are 0.30:1 for Manufacturing, 0.45:1 for Warehouse, 0.30:1 for Office/R&D, and 0.25:1 for Retail. (The FAR multiplied by net site area produces the total non-residential building development on a site.)

Working with County staff, dwelling unit concepts and counts for the residential sites were identified for EIR analysis purposes. For EIR evaluation, it is customary to run high or "worst case scenario" numbers to test infrastructure capacities. As such, it is important to recognize that some residential densities or number of units may overstate market realities or what the County might ultimately find to be appropriate for the sites. In addition, the development program assumptions for each Alternative on some sites have been formulated without the benefit of "on the ground" site planning which could alter conclusions about net developable area.

Employment Densities and Household Size. The building square footages and dwelling units determined above were translated to jobs and population. Two different sets of employment densities, generally measured by square feet of building area per employee, were used, as follows:

	Napa Historical Development Density	Higher Density/Urbanized
Manufacturing	900 SF/employee	not applicable
Warehouse	4,000 SF/employee	not applicable
Office/R&D	500 SF/employee	400 SF/employee
Retail	500 SF/employee	350 SF/employee
Hotel/Time Share	not applicable	1.2 employees per room
Expo Center	not applicable	35 employees
Wineries	5 employees per winery	not applicable
Vineyards	.067 employee per acre	not applicable

The Napa historical employment densities are based on past work on Napa industrial areas by KMA. The 2004 analysis particularly focused on the employment density of very large warehouse operations in Napa. All Napa historical densities are below typical urban averages. For the higher-density or more urbanized EIR scenario concepts, KMA estimates for employment densities were based on experience in comparable Bay Area business parks and conference/meeting facilities.

Dwelling units were converted to population based on data from U.S. Census 2000 and ABAG. Two different factors were used in the conversion process. First, an occupancy/vacancy factor was applied, based on U.S. Census findings. In urban Napa County areas, a typical vacancy level of 4% was determined. However, in the rural county areas, the Census found vacancy levels to be far higher, at 15%, as a result of

3.0 COMMENTS AND RESPONSES TO COMMENTS

the second-home status of many units. For population per occupied household, the ABAG Projections 2005 estimates at 2.57 persons per household in 2030 was used.

Again, the matrix presented in the five-page Table VI-1 summarizes the development program assumptions, jobs, dwelling units, and population for each of the eleven sites or site areas. Extensive footnotes provide additional detail.

Tables VI-2 and VI-3 present the same information organized in a different manner. Table VI-2 lines up the summary figures on one page for jobs and on another page for residential units and population. Table VI-3 presents the totals by square foot area of various building types, complete with percentage composition adding across to total 100%. These tables were developed for use as tools for understanding how the totals are driven by the assumptions in the individual scenarios.

3.0 COMMENTS AND RESPONSES TO COMMENTS

**TABLE VI-1
GENERAL PLAN EIR ALTERNATIVES -
DEVELOPMENT PROGRAM ASSUMPTIONS
NAPA COUNTY INDUSTRIAL LAND USE STUDY
NAPA COUNTY, CA**

	Assumptions	A. Existing Plan Alternative						Total Non-Res.	Total Res.
		Manu.	Warehse	Office/R&D	Retail	Other			
Napa Pipe 150 Acres	Intensity/Density Site Area ¹ Built Area/Units Jobs/Population ² *Less Exig Jobs* Net Job Increase	0.30 FAR 45 ac. 529,000 s.f. 588 jobs 3.4	0.45 FAR 88 ac. 1,181,000 s.f. 298 jobs 3.4	0.30 FAR 38 ac. 441,000 s.f. 1,103 jobs 3.4	0.25 FAR 0 ac. 0 s.f. 0 jobs	0 ac. 0 s.f. 0 jobs	150 ac. 2,161,000 s.f. 1,988 jobs 1,838 jobs	0 du/ac 0 ac. 0 du 0 pers.	
Pacific Coast/BOCA ⁹ 80 Acres	Intensity/Density Site Area ¹ Built Area/Units Jobs/Population ² *Less Exig Jobs* Net Job Increase	0.30 FAR 24 ac. 282,000 s.f. 313 jobs 3.4	0.45 FAR 35 ac. 635,000 s.f. 159 jobs 3.4	0.30 FAR 20 ac. 235,000 s.f. 588 jobs 3.4	0.25 FAR 0 ac. 0 s.f. 0 jobs	0 ac. 0 s.f. 0 jobs	80 ac. 1,152,000 s.f. 1,060 jobs 1,010 jobs	0 du/ac 0 ac. 0 du 0 pers.	
Hess Vineyard ¹⁰ 230 Acres	Intensity/Density Site Area ¹ Built Area/Units Jobs/Population ²	0.30 FAR 0 ac. 0 s.f. 0 jobs	0.45 FAR 0 ac. 0 s.f. 0 jobs	0.30 FAR 0 ac. 0 s.f. 0 jobs	0.25 FAR 0 ac. 0 s.f. 0 jobs	0 ac. 0 s.f. 0 jobs	0 ac. 0 s.f. 0 jobs	0 du/ac 0 ac. 0 du 0 pers.	
Hess Environs/ Industrial Zoning ¹² 150 Acres	Intensity/Density Site Area ¹ Built Area/Units Jobs/Population ²	0.30 FAR 0 ac. 0 s.f. 0 jobs	0.45 FAR 0 ac. 0 s.f. 0 jobs	0.30 FAR 0 ac. 0 s.f. 0 jobs	0.25 FAR 0 ac. 0 s.f. 0 jobs	0 ac. 0 s.f. 0 jobs	0 ac. 0 s.f. 0 jobs	0 du/ac 0 ac. 0 du 0 pers.	
Angwin Scattered Sites ¹²	Built Area/Units Jobs/Population ²	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	400 du 987 pers.	
Other Bubbles	Built Area/Units Jobs/Population ²	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	1,288 du 2,782 pers.	
Scattered Sites ¹²	Built Area/Units Jobs/Population ²	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	567 du 1,244 pers.	
Ag Areas Scattered Sites ¹²	Built Area/Units Jobs/Population ²	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	567 du 1,244 pers.	
A.I.A. ^{14,11} 800 Acres	Intensity/Density Site Area ¹ Built Area/Units Jobs/Population ²	0.30 FAR 120 ac. 1,411,000 s.f. 1,568 jobs	0.45 FAR 560 ac. 9,878,000 s.f. 2,470 jobs	0.30 FAR 120 ac. 1,411,000 s.f. 2,822 jobs	0.25 FAR 0 ac. 0 s.f. 0 jobs	0 ac. 0 s.f. 0 jobs	800 ac. 12,701,000 s.f. 6,860 jobs	0 du/ac 0 ac. 0 du 0 pers.	
City of Napa ¹⁵ Acreage Not Avail.	Intensity/Density Site Area ¹ Built Area/Units Jobs/Population ²	0.30 FAR 0 ac. 0 s.f. 0 jobs	0.45 FAR 0 ac. 0 s.f. 0 jobs	0.30 FAR 0 ac. 0 s.f. 0 jobs	0.25 FAR 0 ac. 0 s.f. 0 jobs	0 ac. 0 s.f. 0 jobs	0 ac. 0 s.f. 0 jobs	0 du/ac 0 ac. 0 du 0 pers.	
Wineries ¹⁶ Acreage Not Avail.	Growth/Year New Wineries Jobs/Population ²					225 wineries 1,125 jobs	225 wineries 1,125 jobs		
Vineyards ¹⁷ 11,260 Acres	Site Area ¹ Jobs/Population ²					0 ac. 0 jobs	0 ac. 0 jobs		
TOTAL	Built Area/Units Jobs/Pop'n Gross ac. used of 1,410 avail. (excl. vineyds)	2,222,000 s.f. 2,469 jobs	11,705,000 s.f. 2,926 jobs	2,987,000 s.f. 4,512 jobs	0 s.f. 9 jobs	1,125 jobs	16,014,000 s.f. 10,832 jobs 1,030 ac.	2,235 du 5,013 pers.	

Prepared by Keyser Marston Associates, Inc.
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3.0 COMMENTS AND RESPONSES TO COMMENTS

TABLE VI-1
GENERAL PLAN EIR ALTERNATIVES -
DEVELOPMENT PROGRAM ASSUMPTIONS
NAPA COUNTY INDUSTRIAL LAND USE STUDY
NAPA COUNTY, CA

	Assumptions	B. Plan Update Alternative					Total Non-Res.	Total Res.
		Manuf.	Warehse	Office/R&D	Retail	Other		
Napa Pipe 150 Acres	Intensity/Density Site Area ¹ Built Area/Units Jobs/Population ² <Less Exlg Jobs> Net Job Increase	0.30 FAR 34 ac. 397,000 s.f. 441 jobs 5.4	0.45 FAR 27 ac. 476,000 s.f. 119 jobs	0.30 FAR 74 ac. 873,000 s.f. 2,183 jobs 5.4	0.25 FAR Incl. in res. 50,000 s.f. 143 jobs	0 ac. 0 s.f. 0 jobs	135 ac. 1,796,000 s.f. 2,885 jobs 1,580 jobs 2,735 jobs	50 du/ac 14 ac. 700 du 1,727 pers.
Pacific Coast/BOCA ⁸ 80 Acres	Intensity/Density Site Area ¹ Built Area/Units Jobs/Population ² <Less Exlg Jobs> Net Job Increase	0.30 FAR 0 ac. 0 s.f. 0 jobs	0.45 FAR 0 ac. 0 s.f. 0 jobs	0.30 FAR 3 ac. 39,000 s.f. 99 jobs	0.25 FAR 10 ac. 100,000 s.f. 286 jobs	0 ac. 0 s.f. 0 jobs	14 ac. 139,000 s.f. 383 jobs 150 jobs 333 jobs	10 du/ac 48 ac. 500 du 1,234 pers.
Hess Vineyard ¹⁰ 230 Acres	Intensity/Density Site Area ¹ Built Area/Units Jobs/Population ²	0.30 FAR 0 ac. 0 s.f. 0 jobs	0.45 FAR 0 ac. 0 s.f. 0 jobs	0.30 FAR 0 ac. 0 s.f. 0 jobs	0.25 FAR 0 ac. 0 s.f. 0 jobs	0 ac. 0 s.f. 0 jobs	0 du/ac 0 ac. 0 du 0 pers.	
Hess Environs/ Industrial Zoning ¹² 150 Acres	Intensity/Density Site Area ¹ Built Area/Units Jobs/Population ²	0.30 FAR 0 ac. 0 s.f. 0 jobs	0.45 FAR 0 ac. 0 s.f. 0 jobs	0.30 FAR 0 ac. 0 s.f. 0 jobs	0.25 FAR 0 ac. 0 s.f. 0 jobs	0 ac. 0 s.f. 0 jobs	0 du/ac 0 ac. 0 du 0 pers.	
Angwin Scattered Sites ¹³ Other Bubbles Scattered Sites ¹⁹ Ag Areas Scattered Sites ¹⁷	Built Area/Units Jobs/Population ² Built Area/Units Jobs/Population ² Built Area/Units Jobs/Population ²	0 s.f. 0 jobs 0 s.f. 0 jobs 0 s.f. 0 jobs	400 du 987 pers. 2,266 du 2,782 pers. 767 du 1,683 pers.					
A.L.A. ^{14,11} 800 Acres	Intensity/Density Site Area ¹ Built Area/Units Jobs/Population ²	0.30 FAR 120 ac. 1,411,000 s.f. 1,568 jobs	0.45 FAR 560 ac. 9,879,000 s.f. 2,470 jobs	0.30 FAR 120 ac. 1,411,000 s.f. 2,822 jobs	0.25 FAR 0 ac. 0 s.f. 0 jobs	0 ac. 0 s.f. 0 jobs	800 ac. 12,701,000 s.f. 6,860 jobs	0 du/ac 0 ac. 0 du 0 pers.
City of Napa ¹⁵ Acreage Not Avail.	Intensity/Density Site Area ¹ Built Area/Units Jobs/Population ²	0.30 FAR 0 ac. 0 s.f. 0 jobs	0.45 FAR 0 ac. 0 s.f. 0 jobs	0.30 FAR 0 ac. 0 s.f. 0 jobs	0.25 FAR 0 ac. 0 s.f. 0 jobs	0 ac. 0 s.f. 0 jobs	0 ac. 0 s.f. 0 jobs	250 du 617 pers.
Wineries ¹⁶ Acreage Not Avail.	Growth/Year New Wineries Jobs/Population ²				87Yr. 225 wineries 1,125 jobs	225 wineries 1,125 jobs		
Vineyards ¹⁷ 11,250 Acres	Site Area ¹ Jobs/Population ²				0 ac. 0 jobs	0 ac. 0 jobs		
TOTAL	Built Area/Units Jobs/Pop'n Gross ac. used of 1,410 avail. (excl. vineyards)	1,808,000 s.f. 2,009 jobs	10,355,000 s.f. 2,589 jobs	2,323,000 s.f. 5,102 jobs	150,000 s.f. 429 jobs 1,125 jobs	14,636,000 s.f. 11,053 jobs 1,030 ac.	3,885 du 9,029 pers.	

Prepared by: Keyser Marston Associates, Inc.
Filename: 001-004305; EIR altis buildouts; 5/8/2006; 12:57 PM; j

3.0 COMMENTS AND RESPONSES TO COMMENTS

TABLE VI-1
GENERAL PLAN EIR ALTERNATIVES -
DEVELOPMENT PROGRAM ASSUMPTIONS
NAPA COUNTY INDUSTRIAL LAND USE STUDY
NAPA COUNTY, CA

	Assumptions	C. Plan Update Alternative 2						Total Res.
		Manuf.	Warehouse	Office/R&D	Retail	Other	Total Non-Res.	
Napa Pipe 150 Acres	Intensity/Density Site Area ¹ Built Area/Units Jobs/Population ² <Less Extg. Jobs> Net Job Increase	0.30 FAR 0 ac. 0 s.f. 0 jobs	0.45 FAR 0 ac. 0 s.f. 0 jobs	0.30 FAR 0 ac. 0 s.f. 0 jobs	0.25 FAR incl. in res. 50,000 s.f. 150 jobs	0 ac. 0 s.f. 0 jobs	0 ac. 50,000 s.f. 150 jobs 150 jobs 0 jobs	40 du/ac 80 ac. 3,200 du 7,895 pers.
Pacific Coast/BOCA ⁹ 80 Acres	Intensity/Density Site Area ¹ Built Area/Units Jobs/Population ² <Less Extg. Jobs> Net Job Increase	0.30 FAR 0 ac. 0 s.f. 0 jobs	0.45 FAR 0 ac. 0 s.f. 0 jobs	0.30 FAR 3 ac. 38,000 s.f. 98 jobs	0.25 FAR 10 ac. 200,000 s.f. 571 jobs	0 ac. 0 s.f. 0 jobs	14 ac. 239,000 s.f. 669 jobs 150 jobs 519 jobs	10 du/ac 48 ac. 500 du 1,234 pers.
Hess Vineyard ¹⁰ 230 Acres	Intensity/Density Site Area ¹ Built Area/Units Jobs/Population ²	0.30 FAR 0 ac. 0 s.f. 0 jobs	0.45 FAR 0 ac. 0 s.f. 0 jobs	0.30 FAR 0 ac. 0 s.f. 0 jobs	0.25 FAR 0 ac. 0 s.f. 0 jobs	0 ac. 0 s.f. 0 jobs	0 ac. 0 s.f. 0 jobs	0 du/ac 0 ac. 0 du 0 pers.
Hess Environs/ Industrial Zoning ¹² 150 Acres	Intensity/Density Site Area ¹ Built Area/Units Jobs/Population ²	0.30 FAR 0 ac. 0 s.f. 0 jobs	0.45 FAR 0 ac. 0 s.f. 0 jobs	0.30 FAR 0 ac. 0 s.f. 0 jobs	0.25 FAR 0 ac. 0 s.f. 0 jobs	0 ac. 0 s.f. 0 jobs	0 ac. 0 s.f. 0 jobs	0 du/ac 0 ac. 0 du 0 pers.
Angwin Scattered Sites ¹²	Built Area/Units Jobs/Population ²	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	600 du 1,460 pers.
Other Bubbles Scattered Sites ¹²	Built Area/Units Jobs/Population ²	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	1,768 du 3,879 pers.
Ag Areas Scattered Sites ¹²	Built Area/Units Jobs/Population ²	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	7,067 du 2,341 pers.
A.J.A. ^{14, 11} 800 Acres	Intensity/Density Site Area ¹ Built Area/Units Jobs/Population ²	0.30 FAR 120 ac. 1,411,000 s.f. 1,568 jobs	0.45 FAR 560 ac. 9,879,000 s.f. 2,470 jobs	0.30 FAR 120 ac. 1,411,000 s.f. 2,822 jobs	0.25 FAR 0 ac. 0 s.f. 0 jobs	0 ac. 0 s.f. 0 jobs	800 ac. 12,701,000 s.f. 6,856 jobs	0 du/ac 0 ac. 0 du 0 pers.
City of Napa ¹⁵ Acreage Not Avail.	Intensity/Density Site Area ¹ Built Area/Units Jobs/Population ²	0.30 FAR 0 ac. 0 s.f. 0 jobs	0.45 FAR 0 ac. 0 s.f. 0 jobs	0.30 FAR 0 ac. 0 s.f. 0 jobs	0.25 FAR 0 ac. 0 s.f. 0 jobs	0 ac. 0 s.f. 0 jobs	0 ac. 0 s.f. 0 jobs	0 ac. 0 ac. 500 du 1,234 pers.
Wineries ¹⁶ Acreage Not Avail.	Growth/Year New Wineries Jobs/Population ²				91% 225 wineries 1,125 jobs	225 wineries 1,125 jobs		
Vineyards ¹⁷ 11,250 Acres	Site Area ¹ Jobs/Population ²				0 ac. 0 jobs	0 ac. 0 jobs		
TOTAL	Built Area/Units Jobs/Pop'n Gross ac. used of 1,410 avail. (excl. vineyards)	1,411,000 s.f. 1,568 jobs	9,879,000 s.f. 2,470 jobs	1,450,000 s.f. 2,920 jobs	250,000 s.f. 721 jobs	0 s.f. 1,125 jobs	12,930,000 s.f. 8,693 jobs 980 ac.	7,635 du 18,063 pers.

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3.0 COMMENTS AND RESPONSES TO COMMENTS

TABLE VI-1
GENERAL PLAN EIR ALTERNATIVES -
DEVELOPMENT PROGRAM ASSUMPTIONS
NAPA COUNTY INDUSTRIAL LAND USE STUDY
NAPA COUNTY, CA

	Assumptions	D. Resource Preservation Alternative						Total Res.
		Manu.	Warehse	Office/R&D	Retail	Other	Total Non-Res.	
Napa Pipe 150 Acres	Intensity/Density Site Area ¹ Built Area/Units Jobs/Population ² <Less Exlg. Jobs> Net Job Increase	0.30 FAR 38 ac. 441,000 s.f. 490 jobs	0.45 FAR 115 ac. 1,985,000 s.f. 496 jobs	0.30 FAR 0 ac. 0 s.f. 0 jobs	0.25 FAR 0 ac. 0 s.f. 0 jobs	0 ac. 0 s.f. 0 jobs	150 ac. 2,426,000 s.f. 986 jobs 1,150 jobs	0 du/ac 0 ac. 0 du 0 pers. 836 jobs
Pacific Coast/BOCA ⁹ 80 Acres	Intensity/Density Site Area ¹ Built Area/Units Jobs/Population ² <Less Exlg. Jobs> Net Job Increase	0.30 FAR 24 ac. 282,000 s.f. 313 jobs	0.45 FAR 38 ac. 635,000 s.f. 159 jobs	0.30 FAR 20 ac. 235,000 s.f. 470 jobs	0.25 FAR 0 ac. 0 s.f. 0 jobs	0 ac. 0 s.f. 0 jobs	80 ac. 1,152,000 s.f. 942 jobs 150 jobs	0 du/ac 0 ac. 0 du 0 pers. 692 jobs
Hess Vineyard ¹⁰ 230 Acres	Intensity/Density Site Area ¹ Built Area/Units Jobs/Population ²	0.30 FAR 0 ac. 0 s.f. 0 jobs	0.45 FAR 0 ac. 0 s.f. 0 jobs	0.30 FAR 0 ac. 0 s.f. 0 jobs	0.25 FAR 0 ac. 0 s.f. 0 jobs	0 ac. 0 s.f. 0 jobs	0 ac. 0 s.f. 0 jobs	0 du/ac 0 ac. 0 du 0 pers.
Hess Environs/ Industrial Zoning ¹² 150 Acres	Intensity/Density Site Area ¹ Built Area/Units Jobs/Population ²	0.30 FAR 0 ac. 0 s.f. 0 jobs	0.45 FAR 0 ac. 0 s.f. 0 jobs	0.30 FAR 0 ac. 0 s.f. 0 jobs	0.25 FAR 0 ac. 0 s.f. 0 jobs	0 ac. 0 s.f. 0 jobs	0 ac. 0 s.f. 0 jobs	0 du/ac 0 ac. 0 du 0 pers.
Argwin Scattered Sites ¹³	Built Area/Units Jobs/Population ²	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	400 du 987 pers.
Other Bubbles Scattered Sites ¹⁷	Built Area/Units Jobs/Population ²	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	1,288 du 2,782 pers.
Ag Areas Scattered Sites ¹⁹	Built Area/Units Jobs/Population ²	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	283 du 621 pers.
A.I.A. ^{14,11} 800 Acres	Intensity/Density Site Area ¹ Built Area/Units Jobs/Population ²	0.30 FAR 420 ac. 1,411,000 s.f. 1,568 jobs	0.45 FAR 560 ac. 9,879,000 s.f. 2,470 jobs	0.30 FAR 120 ac. 1,411,000 s.f. 2,822 jobs	0.25 FAR 0 ac. 0 s.f. 0 jobs	0 ac. 0 s.f. 0 jobs	800 ac. 12,701,000 s.f. 6,860 jobs	0 du/ac 0 ac. 0 du 0 pers.
City of Napa ¹⁵ Acreage Not Avail.	Intensity/Density Site Area ¹ Built Area/Units Jobs/Population ²	0.30 FAR 0 ac. 0 s.f. 0 jobs	0.45 FAR 0 ac. 0 s.f. 0 jobs	0.30 FAR 0 ac. 0 s.f. 0 jobs	0.25 FAR 0 ac. 0 s.f. 0 jobs	0 ac. 0 s.f. 0 jobs	0 ac. 0 s.f. 0 jobs	0 du/ac 0 ac. 0 du 0 pers.
Wineries ¹⁶ Acreage Not Avail.	Growth/Year New Wineries Jobs/Population ²					9/Yr. 225 wineries 1,125 jobs	225 wineries 1,125 jobs	
Vineyards ¹⁷ 71,250 Acres	Site Area ¹ Jobs/Population ²					0 ac. 0 jobs	0 ac. 0 jobs	
TOTAL	Built Area/Units Jobs/Pop'n Gross ac. used of 1,418 avail. (excl. vineyards)	2,134,000 s.f. 2,371 jobs	12,459,000 s.f. 3,125 jobs	1,645,000 s.f. 3,292 jobs	0 s.f. 0 jobs	0 s.f. 1,125 jobs	16,279,000 s.f. 9,713 jobs 1,036 ac.	1,951 du 4,390 pers.

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3.0 COMMENTS AND RESPONSES TO COMMENTS

TABLE VI-1
GENERAL PLAN EIR ALTERNATIVES -
DEVELOPMENT PROGRAM ASSUMPTIONS
NAPA COUNTY INDUSTRIAL LAND USE STUDY
NAPA COUNTY, CA

	Assumptions	E. Infrastructure & Development Alternative							Total Non-Res.	Total Res.
		Manu.	Warehse	Office/R&D	Retail	Expo Center	Conf. Center	Other		
Napa Pipe 150 Acres	Intensity/Density Site Area ¹ Built Area/Units ² Jobs/Population ² «Less Exig. Jobs» Net Job Increase	0.30 FAR 0 ac. 0 s.f. 0 jobs	0.45 FAR 0 ac. 0 s.f. 0 jobs	0.30 FAR 50 ac. 625,000 s.f. 1,563 jobs	0.25 FAR 0 ac. 0 s.f. 0 jobs	0.25 FAR 35 ac. 75,000 s.f. 35 jobs	0 ac. 65 ac. 500 rm 600 jobs	0 ac. 0 s.f. 0 jobs	150 ac. 700,000 s.f. 2,198 jobs (150) jobs 2,048 jobs	0 du/ac 0 ac. 0 du 0 pers.
Pacific Coast/BOCA ⁹ 60 Acres	Intensity/Density Site Area ¹ Built Area/Units ² Jobs/Population ² «Less Exig. Jobs» Net Job Increase	0.30 FAR 0 ac. 0 s.f. 0 jobs	0.45 FAR 0 ac. 0 s.f. 0 jobs	0.30 FAR 3 ac. 39,000 s.f. 98 jobs	0.25 FAR 10 ac. 100,000 s.f. 286 jobs	0 ac. 0 ac. 0 s.f. 0 jobs	0 ac. 0 rm 0 jobs	0 ac. 0 s.f. 0 jobs	14 ac. 139,000 s.f. 383 jobs (50) jobs 333 jobs	21 du/ac 48 ac. 1,000 du 2,467 pers.
Hess Vineyard ¹⁰ 230 Acres	Intensity/Density Site Area ¹ Built Area/Units ² Jobs/Population ²	0.30 FAR 35 ac. 408,000 s.f. 451 jobs	0.45 FAR 161 ac. 2,840,000 s.f. 710 jobs	0.30 FAR 35 ac. 406,000 s.f. 812 jobs	0.25 FAR 0 ac. 0 s.f. 0 jobs	0 ac. 0 ac. 0 s.f. 0 jobs	0 ac. 0 rm 0 jobs	0 ac. 0 s.f. 0 jobs	230 ac. 3,652,000 s.f. 1,973 jobs	0 du/ac 0 ac. 0 du 0 pers.
Hess Environs/ Industrial Zoning ¹² 150 Acres	Intensity/Density Site Area ¹ Built Area/Units ² Jobs/Population ²	0.30 FAR 23 ac. 265,000 s.f. 294 jobs	0.45 FAR 105 ac. 1,852,000 s.f. 463 jobs	0.30 FAR 23 ac. 265,000 s.f. 530 jobs	0.25 FAR 0 ac. 0 s.f. 0 jobs	0 ac. 0 ac. 0 s.f. 0 jobs	0 ac. 0 rm 0 jobs	0 ac. 0 s.f. 0 jobs	150 ac. 2,392,000 s.f. 1,287 jobs	0 du/ac 0 ac. 0 du 0 pers.
Angwin Scattered Sites ¹³	Built Area/Units ² Jobs/Population ²	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	0 rm 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	1,000 du 2,467 pers.
Other Bubbles Scattered Sites ¹³	Built Area/Units ² Jobs/Population ²	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	0 rm 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	1,268 du 2,782 pers.
Ag Areas Scattered Sites ¹³	Built Area/Units ² Jobs/Population ²	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	0 rm 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	3,667 du 5,632 pers.
A.I.A. ^{14,11} 800 Acres	Intensity/Density Site Area ¹ Built Area/Units ² Jobs/Population ²	0.30 FAR 120 ac. 1,411,000 s.f. 1,568 jobs	0.45 FAR 580 ac. 9,879,000 s.f. 2,470 jobs	0.30 FAR 120 ac. 1,411,000 s.f. 2,822 jobs	0.25 FAR 0 ac. 0 s.f. 0 jobs	0 ac. 0 ac. 0 s.f. 0 jobs	0 ac. 0 rm 0 jobs	0 ac. 0 s.f. 0 jobs	800 ac. 12,701,000 s.f. 6,860 jobs	0 du/ac 0 ac. 0 du 0 pers.
City of Napa ¹⁵ Acreage Not Avail.	Intensity/Density Site Area ¹ Built Area/Units ² Jobs/Population ²	0.30 FAR 0 ac. 0 s.f. 0 jobs	0.45 FAR 0 ac. 0 s.f. 0 jobs	0.30 FAR 0 ac. 0 s.f. 0 jobs	0.25 FAR 0 ac. 0 s.f. 0 jobs	0 ac. 0 ac. 0 s.f. 0 jobs	0 ac. 0 rm 0 jobs	0 ac. 0 s.f. 0 jobs	0 ac. 0 s.f. 0 jobs	700 du 1,727 pers.
Wineries ¹⁶ Acreage Not Avail.	Growth/Year New Wineries Jobs/Population ²						9%/yr. 225 wineries 1,125 jobs		225 wineries 1,125 jobs	
Vineyards ¹⁷ 11,250 Acres	Site Area ¹ Jobs/Population ²						11,250 ac. 750 jobs		11,250 ac. 750 jobs	
TOTAL	Built Area/Units ² Jobs/Pop'n Gross ac. used of 1,410 avail. (excl. vineyards)	2,082,000 s.f. 2,313 jobs	14,571,000 s.f. 3,643 jobs	2,746,000 s.f. 5,824 jobs	100,000 s.f. 286 jobs	75,000 s.f. 35 jobs	500 rm 600 jobs	0 s.f. 1,875 jobs	19,574,000 s.f. 14,376 jobs 1,410 ac.	5,535 du 15,075 pers.

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3.0 COMMENTS AND RESPONSES TO COMMENTS

**TABLE VI-1
GENERAL PLAN EIR ALTERNATIVES -
DEVELOPMENT PROGRAM ASSUMPTIONS
NAPA COUNTY INDUSTRIAL LAND USE STUDY
NAPA COUNTY, CA**

Notes:

- ¹ Non-residential site areas are listed in gross acres; residential site areas in net acres.
- ² Population based on persons per household, occupancy, and ratio of total versus household population:

Persons/household (ABAG projections) =	2.57
Occupancy rate in urbanized areas (U.S. Census 2000) =	96%
Occupancy rate in outlying/rural areas (U.S. Census 2000) =	85%
- ³ Assumes a blend of A.I.A. and City business park user mix, i.e., 30% Manufacturing, 45% Warehouse, and 25% Office/R&D. Net to gross at 90%.
- ⁴ Jobs in areas expected to have traditional development densities based on employment ratios as follows:

Manufacturing	900 SF/Emp. , as estimated in KMA's 2004 Jobs/Housing Analysis for A.I.A.
Warehouse	4,000 SF/Emp. , as estimated in KMA's 2004 Jobs/Housing Analysis for A.I.A.
Office/R&D	500 SF/Emp. , as estimated in KMA's 2004 Jobs/Housing Analysis for A.I.A.
Comm./Other	500 SF/Emp. , as estimated in KMA's 2004 Jobs/Housing Analysis for A.I.A.
Jobs/Winery	5 Emp./Winery , per County staff.
Jobs/Vineyd-Ac.	0.067 Emp./Ac. , per MKF Research's Economic Impact of California Wine 2004.
- ⁵ Jobs in higher density/urban configurations and expo/conference center based on employment ratios as follows:

Office/R&D	400 SF/Emp. , per KMA estimate.
Comm./Other	350 SF/Emp. , per KMA estimate.
Hotel/Time Sh.	1.2 Emp./Rm. , per KMA estimate.
Expo Center	35 Emp. , per KMA estimate.
- ⁶ Assumes 25% Manufacturing, 20% Warehouse, and 55% Office/R&D, with some live/work units and retail on 10% of the available land. Net to gross @ 90%.
- ⁷ Assumes the majority of industrial acres in warehousing (75%) and the remainder in manufacturing (25%). Net to gross @ 90%.
- ⁸ In Alternative E, the Napa Pipe site is projected to develop as a conference center with hotel, time share, recreation, and office/retail; and a new home for the Expo Center.
- ⁹ Pacific Coast/BOCA site is 80 gross acres/100% developable for industrial with net to gross at 90%; 60 net acres with 80% residential and 20% buffer commercial in the non-industrial scenarios, per Napa County staff.
- ¹⁰ Assumes 230 industrially-zoned acres, per County staff.
- ¹¹ Assumes Napa County A.I.A. mix of users, i.e., 15% Manufacturing, 70% Warehouse, and 15% Office/R&D. Net to gross @ 90%.
- ¹² Assumes 150 industrially-zoned acres, per County staff, excluding golf courses.
- ¹³ Although acreage (per County staff) in Angwin (410 acres), Other Bubbles (5,700 acres), and Ag Areas (475,000 acres) is quite large, development is only expected to occur on a few scattered sites.
- ¹⁴ Assumes 800 acres, per Phase I Table 5b (1/23/06 package).
- ¹⁵ Assumes 250 to 500 units, per County staff. Alternative E assumes 500 units plus 200 units on the vacated Expo site, for a total of 700 units.
- ¹⁶ Assumes 9 wineries per year, per County staff.
- ¹⁷ Assumes negligible increase, say 25% over 45,000 acre base, or 11,250 acres, in Alt. E, per County staff.

3.0 COMMENTS AND RESPONSES TO COMMENTS

**TABLE VI-2
EIR ALTERNATIVES DEVELOPMENT PROGRAMS SUMMARY
NON-RESIDENTIAL AND RESIDENTIAL TOTALS BY SITE
NAPA COUNTY INDUSTRIAL LAND USE STUDY
NAPA COUNTY, CA**

	Assumptions	Total Non-Residential Development				
		A. Existing Plan Alternative	B. Plan Update Alternative	C. Plan Update Alternative 2	D. Resource Preservation Alternative	E. Infrastructure & Development Alternative
Napa Pipe 150 Acres	Intensity/Density Site Area ¹ Built Area/Units Jobs/Population ² <Less Exlg. Jobs> Net Job Increase	150 ac. 2,161,000 s.f. 1,988 jobs (150) jobs 1,838 jobs 3, 4, 5	135 ac. 1,796,000 s.f. 2,885 jobs (150) jobs 2,735 jobs 4, 4, 5	0 ac. 50,000 s.f. 150 jobs (150) jobs 0 jobs 5	150 ac. 2,426,000 s.f. 986 jobs (150) jobs 836 jobs 7, 4	150 ac. 700,000 s.f. 2,198 jobs (150) jobs 2,048 jobs 4, 3
Pacific Coast/BOCA ⁹ 80 Acres	Intensity/Density Site Area ¹ Built Area/Units Jobs/Population ² <Less Exlg. Jobs> Net Job Increase	80 ac. 1,152,000 s.f. 1,060 jobs (50) jobs -1,070 jobs 3, 4, 5	14 ac. 139,000 s.f. 383 jobs (50) jobs 333 jobs 5	14 ac. 239,000 s.f. 669 jobs (50) jobs 619 jobs 5	80 ac. 1,152,000 s.f. 942 jobs (50) jobs 892 jobs 3, 4	14 ac. 139,000 s.f. 383 jobs (50) jobs 333 jobs 5
Hess Vineyard ¹⁰ 230 Acres	Intensity/Density Site Area ¹ Built Area/Units Jobs/Population ²	0 ac. 0 s.f. 0 jobs	0 ac. 0 s.f. 0 jobs	0 ac. 0 s.f. 0 jobs	0 ac. 0 s.f. 0 jobs	230 ac. 3,652,000 s.f. 1,973 jobs 11, 4
Hess Environs/ Industrial Zoning ¹² 150 Acres	Intensity/Density Site Area ¹ Built Area/Units Jobs/Population ²	0 ac. 0 s.f. 0 jobs	0 ac. 0 s.f. 0 jobs	0 ac. 0 s.f. 0 jobs	0 ac. 0 s.f. 0 jobs	150 ac. 2,382,000 s.f. 1,287 jobs 17, 4
Angwin Scattered Sites ¹³	Built Area/Units Jobs/Population ²	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs
Other Bubbles Scattered Sites ¹⁴	Built Area/Units Jobs/Population ²	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs
Ag Areas Scattered Sites ¹⁵	Built Area/Units Jobs/Population ²	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs	0 s.f. 0 jobs
A.I.A. ^{14, 15} 800 Acres	Intensity/Density Site Area ¹ Built Area/Units Jobs/Population ²	800 ac. 12,701,000 s.f. 6,860 jobs 4	800 ac. 12,701,000 s.f. 6,860 jobs 4	800 ac. 12,701,000 s.f. 6,860 jobs 4	800 ac. 12,701,000 s.f. 6,860 jobs 4	800 ac. 12,701,000 s.f. 6,860 jobs 4
City of Napa (County- Controlled) ¹⁶ Acreage Not Avail.	Intensity/Density Site Area ¹ Built Area/Units Jobs/Population ²	0 ac. 0 s.f. 0 jobs	0 ac. 0 s.f. 0 jobs	0 ac. 0 s.f. 0 jobs	0 ac. 0 s.f. 0 jobs	0 ac. 0 s.f. 0 jobs
Wineries ¹⁶ Acreage Not Avail.	Growth/Year New Wineries Jobs/Population ²	225 wineries 1,125 jobs 4	225 wineries 1,125 jobs 4	225 wineries 1,125 jobs 4	225 wineries 1,125 jobs 4	225 wineries 1,125 jobs 4
Vineyards ¹⁷ 11,250 Acres	Site Area ¹ Jobs/Population ²	0 ac. 0 jobs	0 ac. 0 jobs	0 ac. 0 jobs	0 ac. 0 jobs	11,250 ac. 750 jobs 4
TOTAL UNINCORP. AREAS	Built Area/Units Jobs/Pop'n Gross ac. used of 1,410 avail. (excl. vineyds)	15,014,000 s.f. 10,832 jobs 1,030 ac.	14,636,000 s.f. 11,053 jobs 1,030 ac.	12,950,000 s.f. 8,603 jobs 980 ac.	16,279,000 s.f. 9,713 jobs 1,030 ac.	19,574,000 s.f. 14,376 jobs 1,410 ac.

3.0 COMMENTS AND RESPONSES TO COMMENTS

TABLE VI-2
EIR ALTERNATIVES DEVELOPMENT PROGRAMS SUMMARY
NON-RESIDENTIAL AND RESIDENTIAL TOTALS BY SITE
NAPA COUNTY INDUSTRIAL LAND USE STUDY
NAPA COUNTY, CA

	Assumptions	Total Residential Development				
		A. Existing Plan Alternative	B. Plan Update Alternative	C. Plan Update Alternative 2	D. Resource Preservation Alternative	E. Infrastructure & Development Alternative
Napa Pipe 150 Acres	Intensity/Density Site Area ¹ Built Area/Units Jobs/Population ² <Less Extg Jobs> Net Job Increase	0 du/ac 0 ac. 0 du 0 pers.	50 du/ac 14 ac. 700 du 1,727 pers.	40 du/ac 80 ac. 3,200 du 7,895 pers.	0 du/ac 0 ac. 0 du 0 pers.	0 du/ac 0 ac. 0 du 0 pers.
Pacific Coast/BOCA ⁹ 80 Acres	Intensity/Density Site Area ¹ Built Area/Units Jobs/Population ² <Less Extg Jobs> Net Job Increase	0 du/ac 0 ac. 0 du 0 pers.	10 du/ac 48 ac. 500 du 1,234 pers.	10 du/ac 46 ac. 500 du 1,234 pers.	0 du/ac 0 ac. 0 du 0 pers.	21 du/ac 48 ac. 1,000 du 2,467 pers.
Hess Vineyard ¹⁰ 230 Acres	Intensity/Density Site Area ¹ Built Area/Units Jobs/Population ²	0 du/ac 0 ac. 0 du 0 pers.	0 du/ac 0 ac. 0 du 0 pers.	0 du/ac 0 ac. 0 du 0 pers.	0 du/ac 0 ac. 0 du 0 pers.	0 du/ac 0 ac. 0 du 0 pers.
Hess Environs/ Industrial Zoning ¹² 150 Acres	Intensity/Density Site Area ¹ Built Area/Units Jobs/Population ²	0 du/ac 0 ac. 0 du 0 pers.	0 du/ac 0 ac. 0 du 0 pers.	0 du/ac 0 ac. 0 du 0 pers.	0 du/ac 0 ac. 0 du 0 pers.	0 du/ac 0 ac. 0 du 0 pers.
Angwin Scattered Sites ¹³	Built Area/Units Jobs/Population ²	400 du 987 pers.	400 du 987 pers.	600 du 1,480 pers.	400 du 987 pers.	1,000 du 2,467 pers.
Other Bubbles Scattered Sites ¹³	Built Area/Units Jobs/Population ²	1,268 du 2,782 pers.	1,268 du 2,782 pers.	1,768 du 3,879 pers.	1,268 du 2,782 pers.	1,268 du 2,782 pers.
Ag Areas Scattered Sites ¹³	Built Area/Units Jobs/Population ²	567 du 1,244 pers.	767 du 1,683 pers.	1,057 du 2,341 pers.	283 du 621 pers.	2,567 du 5,632 pers.
A.I.A. ^{14, 15} 800 Acres	Intensity/Density Site Area ¹ Built Area/Units Jobs/Population ²	0 du/ac 0 ac. 0 du 0 pers.	0 du/ac 0 ac. 0 du 0 pers.	0 du/ac 0 ac. 0 du 0 pers.	0 du/ac 0 ac. 0 du 0 pers.	0 du/ac 0 ac. 0 du 0 pers.
City of Napa (County- Controlled) ¹⁵ Acreage Not Avail.	Intensity/Density Site Area ¹ Built Area/Units Jobs/Population ²	0 du/ac 0 ac. 0 du 0 pers.	250 du 617 pers.	500 du 1,234 pers.	0 du/ac 0 ac. 0 du 0 pers.	700 du 1,727 pers.
Wineries ¹⁶ Acreage Not Avail.	Growth/Year New Wineries Jobs/Population ²					
Vineyards ¹⁷ 11,250 Acres	Site Area ¹ Jobs/Population ²					
TOTAL UNINCORP. AREAS	Built Area/Units Jobs/Pop'n Gross ac. used of 1,410 avail. (excl. vineyds)	2,235 du 5,013 pers.	3,885 du 9,029 pers.	7,635 du 18,063 pers.	1,951 du 4,391 pers.	6,535 du 15,075 pers.

TABLE VI-2
EIR ALTERNATIVES DEVELOPMENT PROGRAMS SUMMARY.
NON-RESIDENTIAL AND RESIDENTIAL TOTALS BY SITE
NAPA COUNTY INDUSTRIAL LAND USE STUDY
NAPA COUNTY, CA

Notes:

- ¹ Non-residential site areas are listed in gross acres; residential site areas in net acres.
- ² Population based on persons per household, occupancy, and ratio of total versus household population:
 Persons/household (ABAG projections) = 2.57
 Occupancy rate in urbanized areas (U.S. Census 2000) = 96%
 Occupancy rate in outlying/rural areas (U.S. Census 2000) = 85%
- ³ Assumes a blend of A.I.A. and City business park user mix, i.e., 30% Manufacturing, 45% Warehouse, and 25% Office/R&D. Net to gross at 90%.
- ⁴ Jobs in areas expected to have traditional development densities based on employment ratios as follows:
 Manufacturing 900 SF/Emp. , as estimated in KMA's 2004 Jobs/Housing Analysis for A.I.A.
 Warehouse 4,000 SF/Emp. , as estimated in KMA's 2004 Jobs/Housing Analysis for A.I.A.
 Office/R&D 500 SF/Emp. , as estimated in KMA's 2004 Jobs/Housing Analysis for A.I.A.
 Comm./Other 500 SF/Emp. , as estimated in KMA's 2004 Jobs/Housing Analysis for A.I.A.
 Jobs/Winery 5 Emp./Winery , per County staff.
 Jobs/Vineyd-Ac. 0.067 Emp./Ac. , per MKF Research's Economic Impact of California Wine 2004.
- ⁵ Jobs in higher density/urban configurations and expo/conference center based on employment ratios as follows:
 Office/R&D 400 SF/Emp. , per KMA estimate.
 Comm./Other 350 SF/Emp. , per KMA estimate.
 Hotel/Time Sh. 1.2 Emp./Rm. , per KMA estimate.
 Expo Center 35 Emp. , per KMA estimate.
- ⁶ Assumes 25% Manufacturing, 20% Warehouse, and 55% Office/R&D, with some live/work units and retail on 10% of the available land. Net to gross @ 90%.
- ⁷ Assumes the majority of industrial acres in warehousing (75%) and the remainder in manufacturing (25%). Net to gross @ 90%.
- ⁸ In Alternative E, the Napa Pipe site is projected to develop as a conference center with hotel, time share, recreation, and office/retail; and a new home for the Expo Center.
- ⁹ Pacific Coast/BOCA site is 80 gross acres/100% developable for industrial with net to gross at 90%; 60 net acres with 80% residential and 20% buffer commercial in the non-industrial scenarios, per Napa County staff.
- ¹⁰ Assumes 230 industrially-zoned acres, per County staff.
- ¹¹ Assumes Napa County A.I.A. mix of users, i.e., 15% Manufacturing, 70% Warehouse, and 15% Office/R&D. Net to gross @ 90%.
- ¹² Assumes 150 industrially-zoned acres, per County staff, excluding golf courses.
- ¹³ Although acreage (per County staff) in Angwin (410 acres), Other Bubbles (5,700 acres), and Ag Areas (475,000 acres) is quite large, development is only expected to occur on a few scattered sites.
- ¹⁴ Assumes 800 acres, per Phase I Table 5b (1/23/06 package).
- ¹⁵ Assumes 250 to 500 units, per County staff. Alternative E assumes 500 units plus 200 units on the vacated Expo site, for a total of 700 units.
- ¹⁶ Assumes 9 wineries per year, per County staff.
- ¹⁷ Assumes negligible increase, say 25% over 45,000 acre base, or 11,250 acres, in Alt. E, per County staff.

3.0 COMMENTS AND RESPONSES TO COMMENTS

TABLE VI-3
 EIR DEVELOPMENT PROGRAMS SUMMARY
 NON-RESIDENTIAL AND RESIDENTIAL TOTALS
 NAPA COUNTY INDUSTRIAL LAND USE STUDY
 NAPA COUNTY, CA

Building Area/Units	Manufacturing				Warehouse				Offices/R&D				Comm./Other		Expol/Conf. Ctr.		Total Non-Resid. SF		Total Resid. Units	
	%	Jobs	Sq. Ft.	%	%	Jobs	Sq. Ft.	%	%	Jobs	Sq. Ft.	%	%	Jobs	Sq. Ft.	%	%	Sq. Ft.	Units	
Alternative																				
A. Existing Plan	2,222	23%	11,705,000	73%	2,087,000	42%	0	0%	0	0%	0	0%	0	0%	16,014,000	s.f.	2,235	du		
B. Plan Update (modest change)	1,808	18%	10,355,000	71%	2,323,000	46%	429	4%	150,000	s.f.	1%	0	0%	14,636,000	s.f.	3,885	du			
C. Plan Update 2 (high residential)	1,411	16%	9,878,000	76%	1,450,000	34%	721	6%	260,000	s.f.	2%	0	0%	12,890,000	s.f.	7,635	du			
D. Resource Preservn. (lowest growth)	2,134	18%	12,493,000	77%	1,846,000	34%	3,282	3%	0	0%	0	0%	16,279,000	s.f.	1,891	du				
E. Infrastbr. & Devel. (high econ. devel.)	2,082	16%	14,571,000	74%	2,746,000	41%	289	2%	100,000	s.f.	1%	75,000	s.f.	19,574,000	s.f.	6,535	du			

Jobs/Population	Manufacturing				Warehouse				Offices/R&D				Comm./Other		Expol/Conf. Ctr.		Total Unincorp. Area Jobs ¹		Total Population	
	%	Jobs	Sq. Ft.	%	%	Jobs	Sq. Ft.	%	%	Jobs	Sq. Ft.	%	%	Jobs	Sq. Ft.	%	%	Jobs	Population	
Alternative																				
A. Existing Plan	2,469	18%	4,512	42%	0	0%	0	0%	0	0%	0	0%	0	0%	10,832	jobs	5,613	pers.		
B. Plan Update (modest change)	2,009	16%	5,102	46%	429	4%	721	6%	429	4%	11,063	jobs	9,029	pers.						
C. Plan Update 2 (high residential)	1,568	16%	2,920	34%	721	6%	3,282	3%	721	6%	8,603	jobs	16,063	pers.						
D. Resource Preservn. (lowest growth)	2,371	18%	3,282	34%	3,125	24%	0	0%	0	0%	9,713	jobs	4,390	pers.						
E. Infrastbr. & Devel. (high econ. devel.)	2,313	16%	5,824	41%	3,643	25%	635	4%	289	2%	14,376	jobs	15,075	pers.						

¹ Adjusted to remove 200 currently existing jobs in various land uses on the Napa Pipe and Pacific Coast/BOCA sites.

3.0 COMMENTS AND RESPONSES TO COMMENTS

LETTER 103: PAULA J. PETERSON, JUNE 4, 2007

Response 103-1 E: Commenter is not clear how zero (0) square feet and zero (0) jobs equate to total dwelling units (du) and jobs/population in the Plan Alternatives, as shown in the Keyser Marston Associates, Inc. (KMA) report. The table that is referenced from the KMA report (Table VI-1) does not intend to equate 0 square feet plus 0 jobs to 400 dwelling units. Instead the numbers are intended to note that no new businesses or jobs are anticipated; however, due to the PUC proposal, a worst case scenario of 400 du was assumed for purposes of the KMA Industrial Land Use Study.

3.0 COMMENTS AND RESPONSES TO COMMENTS

Letter 104



1195 THIRD STREET, ROOM 310 ♦ NAPA, CALIFORNIA 94559
PHONE (707) 259-8679 ♦ FAX (707) 259-8681

R. Patrick Lowe
Napa County
Conservation Development & Planning Dept.
1195 Third Street, Suite 210
Napa, CA 94559

Subject: Napa County General Plan Update

Dear Mr. Lowe:

The Napa County Workforce Investment Board (WIB) would like to commend your department and the General Plan Update Steering Committee on the good work that has been done on behalf of the County. We fully support the Board of Supervisors early decision to include an Economic element in the update process and are pleased to see that the Steering Committee has recognized the very important need to "Develop and maintain a skilled and adaptable local workforce" (Goal E-3).

104-1P

As you might know, the WIB is the County's only organization that has workforce development at the center of all of its work. We understand that a strong economy is characterized by an abundance of well-paying jobs and that the availability of a skilled workforce will assure continued economic success for our businesses. In order to promote a strong economy, the Workforce Investment Board assures the integration of employment, training, education, and business services for job seekers, workers and employers. **Our vision** is of a strong economy in which employers have an ample supply of skilled labor resources and residents have access to an abundance of quality jobs.

In the years ahead, we believe that Napa faces a workforce shortage because of an:

Aging Workforce

- As the "baby boomer" generation moves rapidly toward retirement, more of the county's employers may be unable to find the skilled workers they need to remain competitive. According to an analysis recently issued by Dr. Robert Fountain and Marcia Cosgrove from CSU-Sacramento, California will need to replace 1.4 million workers with higher education who will be retiring or otherwise leaving their occupations. There are more than 70 million "baby boomers" in the workforce now and only 40 million in the generation following them. According to the 2005 Napa County Community Indicators report the largest percentage population increases in Napa, between the years 2000 and 2004 were seen in the 50 to 59 and 60 to 64 age ranges, which increased by 20 and 21 percent respectively.

104-2P

Immigration

- More than nine million immigrants comprise 26.4 percent of California's population, while accounting for 28 percent of the nation's total immigrant population. In Napa, the Hispanic population grew 16 percent in four years and now represents 27 percent of the

104-3P

Bill Blair	Arvin Chaudhary, <i>Chair</i>	Rhonda Slots, <i>Vice Chair</i>	Debbly Fries
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	Brad Wagenknecht	Michael White	
	Sandy Cooper	Donna DeWeerd	
	Aurelio Hurtado	William Kreysler	
	Mary Ann Mancuso	Maritza Monge	
	Dorothy Lind Salmon	Eric Sklar	
	Carol Whichard	Teresi Zimny	

3.0 COMMENTS AND RESPONSES TO COMMENTS

- total County population. The large number of immigrants with low levels of education means that immigration has dramatically increased the supply of workers with less than a high school degree. As a result, any effect immigration may have on wages or job opportunities will disproportionately affect less-skilled workers, who already suffer the lowest pay.
- High levels of immigration to Napa also means that our county may have the labor supply essential to replacing our aging workforce. The Workforce Investment Board looks forward to working with the County to develop policies that will encourage further education and training opportunities for our new immigrants.

104-3P
cont'd

Wage and Skills Gap

- The gap between the state's highest- and lowest-wage earners has widened in California and is substantially wider than that for the nation as a whole. In 1979, the highest-wage California workers, those at the 90th percentile, earned 3.8 times more than the lowest paid workers, those at the 10th percentile. Twenty-five years later, California's highest paid workers earned 5.1 times more than the lowest paid workers, compared to 4.4 times more for the nation as a whole.
- Workers aged 18 and over with a bachelor's degree today earn an average of \$51,206 a year, while those with a high school diploma earn \$27,915. Workers with an advanced degree make an average of \$74,602 and those without a high school diploma average \$18,734.
- Current trends in Napa indicate a growing disparity between the local income and cost of living. The four job sectors paying the highest wages in the county are projected to provide only 10% of new jobs. At the same time, the four fastest-growing job sectors accounting for more than 44% of new jobs, pay below median wages. Almost 65% of new jobs in Napa County are expected to pay at or below median wages. Unless jobs can be created which raise the incomes of lower wage workers in the County and steps can be taken to reduce cost of living, this disparity will continue to be a problem.

104-4P

The WIB looks at these issues strategically and regularly updates its own policies and puts into action programs that will address them. We would like to recommend that the General Plan Update Steering Committee adopt a policy(s) that clearly identifies the WIB's role as the organization with dedicated workforce resources and the wherewithal to address the above issues. In addition, we urge that the new policy(s) include, by reference, the WIB's Strategic 5-year Workforce Development Plan, which is dedicated to and outlines strategies and programs for "Developing and maintaining a skilled and adaptable local workforce".

104-5P

Thank you for considering these comments.

Sincerely,



Bruce Wilson,
Executive Director

3.0 COMMENTS AND RESPONSES TO COMMENTS

LETTER 104: BRUCE WILSON, NAPA COUNTY WORKFORCE INVESTMENT BOARD,
[UNDATED]

Response 104-1 P: Commenter notes that the vision of the Napa County Workforce Investment Board (WIB) is a strong economy where employers have ample skilled labor and residents have access to abundant jobs. Commenter commends the County on work performed during the General Plan Update and supports Goal E-3. The County appreciates the support of the commenter.

Response 104-2 P: Commenter notes that as baby boomers retire, more county employers may be unable to find skilled workers to remain competitive. The commenter's statement associated with this issue is understood.

Response 104-3 P: Commenter summarizes the effects and needs of immigrant populations in the County and looks forward to working with the County to develop policies to encourage further education and training for immigrant workers. The commenter's statement associated with this issue is understood. See the Action Item under Policy E-14 in the Economic Development Element.

Response 104-4 P: Commenter notes that unless jobs can be created which raise the income of lower wage workers and steps taken to reduce cost of living, disparity will continue to be a problem. The commenter's statement associated with this issue is understood. See the revised goals and policies in the Economic Development Element.

Response 104-5 P: Commenter requests the Steering Committee adopt policies that clearly identify WIB's role as an organization with dedicated workforce resources. Such policies should include, by reference, the WIB Strategic 5-year Workforce Development Plan. The commenter's statement associated with this issue is understood. See the Action Item under Policy E-14 in the Economic Development Element.

Letter 105



June 18, 2007

Napa County Planning, Development, and Conservation Department
Patrick Lowe, Deputy Planning Director
1195 Third St., Suite 210
Napa, CA 94559

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Advisory Board**

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Neil Bowman-Davis
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Francie Winnen

Draft General Plan and Draft EIR Comments

Friends of the Napa River is submitting the attached matrix of comments on the Napa County Draft General Plan (DGP) and Draft EIR (DEIR) with our mission in mind that FONR is the "Community's voice for protection, restoration, responsible development and celebration of the Napa River and its watershed." Our examination of both documents has led us to the conclusion that more work and study is needed to make them "adequate" for the job of guiding the County's evolution to 2030.

Our major concerns are:

- The population and agricultural growth rates projected by the DGP and the alternatives included in DEIR will have significant negative impacts to the Napa River and its watershed.
- The DGP policies do not adequately address measures to improve the health of the Napa River and its watershed.
- The DGP and the DEIR do not contain goals and policies to monitor, analyze and mitigate the projected climate change impacts to the Napa River and its watershed.
- The DGP does not adequately address the Napa River's role as a significant biologic, recreational, and esthetic factor in the quality of life in Napa County.
- The land use planning tools of "transitional designation" and "Urban Bubbles" are problematic with regards to protecting the Napa River watershed and open space.
- The DEIR incompletely addresses the DGP as it has been presented to the community for review.

105-1E/P

We look forward to helping our community in this General Plan update process. We appreciate the tremendous amount of time and energy that the Planning Department and the Steering Committee have committed to this Draft General Plan.

As it becomes time to move the process forward to the Planning Commission and, ultimately, to the Board of Supervisors, they will need to spend a tremendous amount of time reading, learning, and understanding the DGP. This document will be determining the future for Napa County: a very large responsibility. We hope they have the patience and tenacity to demand the best.

Thank you,

Bernhard Krevet
President

Francie Winnen
Secretary

The community's voice for the responsible protection, restoration, development and celebration of the Napa River and its watershed through education and advocacy.

3.0 COMMENTS AND RESPONSES TO COMMENTS

Friends of the Napa River comments regarding the Draft Napa County General Plan and the Draft Environmental Impact Report, 06/18/07

#	Item and location in Draft General Plan	Suggested Recommendations	Reasons	
Summary: A Vision for Napa County in 2030				
1	Page 14: Longstanding community values include agricultural preservation, resource conservation, and Urban-centered growth. These values will be perpetuated by this General Plan and will continue to ensure that new housing and commercial enterprises are directed to <u>already developed areas</u> , and that every important land use decision is scrutinized for its potential to affect the quality of life, <u>the environment</u> we live in, and the farmer's ability to farm....	Replace <u>already developed area</u> with existing incorporated Cities and urbanized areas. Replace <u>the environment</u> with the natural environment	Already developed area by the glossary could be all the land in the county that has been in any way touch by man. The natural environment, with the Napa River and its watershed at its heart, has often been touched by man to its detriment. Now faced with the combined and unprecedented pressures of growth and global warming, the GP must rigorously commit to conservation of these resources with clear and specific Goals and Policies.	105-2P
2	Page 15: New non-agricultural development will continue to be focused in the incorporated cities and <u>already developed areas.</u>	Replace <u>already developed area</u> with urbanized areas.	The term "existing incorporated and urban/urbanized areas" is in the current GP and is a much clearer statement that will create less ambiguity.	105-3P
3	Page 16: Napa County in 2030 will retain its rural character and outstanding quality of life. This General plan will preserve and improve the quality of life and the rural character of the County by proactively addressing <u>land use, traffic, and safety in concerns</u> addition to sustaining <u>the agricultural industry.</u>	Add: <u>land use, traffic, and safety concerns, as well as the natural resources/environment which underlies and sustains the County's health and prosperity in addition to sustaining the agricultural industry.</u>	There is no mention of the natural environment as an important element of the County's outstanding quality of life that needs to be preserved.	105-4P
4	Page 16, p-3: add Green Building recommendations	Within the Vision section add: .. "This Plan will also encourage sustainable, energy efficient, and non-polluting building design and construction practices to insure that Napa takes a leadership role in promoting resource protection and conservation."		105-5P
5	Page 19: The <u>Napa River will increasingly run</u> clean and healthy, supporting native fish, plants, and animals and serving as an important part of the life of the County's people.	<u>The Napa River and its tributaries will run increasingly clean and healthy....</u>	The Napa River will only increasingly run clean and healthy if its watershed and tributaries are healthy.	105-6E/P
6	Page 19: <u>The River is also an important</u> natural resource, providing habitat for numerous fish, plants, and animals, including ...	Rephrase: <u>The River will continue to be an important</u> natural resource,		105-7P

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Friends of the Napa River comments regarding the Draft Napa County General Plan and the Draft Environmental Impact Report, 06/18/07

#	Item and location in Draft General Plan	Suggested Recommendations	Reasons	
7	Page 19: ...threatened and <u>endangered species such as cutthroat trout.</u>	Delete information on <u>cutthroat trout.</u> Add: ...and <u>endangered species as well as a resource that serves the needs of the human habitat as stated in the text of "The Living River Principles."</u>	The native species coastal cutthroat is not within the Napa River and is not endangered. It is a state and federal species of special concern. The central California coast DPS of steelhead, which is in the Napa River is the most sensitive listing of any other salmonid species and is federally threatened. The steelhead evolutionarily significant units (ESU) are now referred to (and will be referred to in NMFS upcoming Steelhead Recovery Plan - due June 30, 2007) as "Distinct Population Segments." The two salmon species are still referred to by their ESUs. Steelhead have an optional resident life history that does not depend on travel to the ocean.	105-8E/P
8	Page 19: The General Plan contains specific policies and steps to improve the health of <u>the Napa River and help</u> restore its natural populations of native species.	Add: <u>the Napa River watershed and help</u> restore. Need: More specific policies for achieving a healthier watershed.	As stated previously, the river is only as healthy as its watershed.	105-9P
9	Page 19: <u>A healthier river will invite more visitors,</u> and this plan seeks to improve both habitat and access to the river, as well as expanding education and outreach efforts.	Needs to be changed. Suggest- " <u>A healthier river will attract more residents and visitors for recreation, boating, walking, and observing the wild life and the natural beauty. The General Plan recognizes the growing importance of the Napa River and its watershed to the County's residents and tourists as an important recreational opportunity, flood management tool, and a boon to our economy and quality of life.</u> "	The proposed sentence gives the impression that the County's reason to improve the health of the river is that it will attract more visitors.	105-10P
10	Page 19, p-4: ... <u>to reduce impacts created by septic tank failures, erosion, and sediment build-up....</u>	Add: ... <u>to reduce impacts created by septic tank failures, erosion, construction and farming activities, and sediment build-up....</u>	Obviously.	105-11P

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3.0 COMMENTS AND RESPONSES TO COMMENTS

Friends of the Napa River comments regarding the Draft Napa County General Plan and the Draft Environmental Impact Report, 06/18/07

#	Item and location in Draft General Plan	Suggested Recommendations	Reasons	
11	<p>Page 19: Missing "Living River Principles"</p> <p>The Goals and Objectives for a "Living" Napa River System, based on geomorphic, water quality and habitat considerations were completed for the Community Coalition for a Napa River Flood Management Plan on July 2, 1996.</p>	<p>Add: A "living" Napa River system functions properly when it conveys variable flows and stores water in the floodplain, balances sediment input with sediment transport, provides good quality fish and wildlife habitat, maintains good water quality and quantity and provides recreation and aesthetic values. A "living" Napa River conveys equilibrium and harmony with all that it touches and resonates this through the human and natural environment.</p> <p>One of the goals is for activities along the Napa River to use geomorphic principles involving river channel geometry and sediment transport dynamics, taking into account the differences between estuarine and riverine reaches. The overall objective is to maintain a long-term, sustaining river ecosystem that is a "living" Napa River system.</p>	<p>We strongly recommend that the summary text of The Living River Principles be included. The table of 54 detailed principles is available on the County Flood Control web site or from Friends of the Napa River.</p>	105-12P
12	<p>Page 22: Napa County will respond to change and to internal and external factors in proactive ways, identifying issues before they become crisis and developing innovative ways to respond.</p>	<p>Add: The County will adopt goals and policies to monitor, assess and mitigate where possible significant impacts from global warming.</p>	<p>No matter what the reason or duration significant climate change will affect the County. The Napa River and its watershed, in the near future would be profoundly impacted by climate change; projected changes of rising water levels, increased salinity in the river's southern reaches and wetlands, lowering of water tables throughout the watershed as a result of drought, and a negative impact on fish by the rising ambient temperatures to name a few.</p>	105-13E/P
Agricultural Preservation and Land Use				
13	<p>Page 33: Ag/LU Goal 1 "Preserve existing agricultural land uses."</p>	<p>Add: "Preserve existing agricultural land and agricultural watershed/open space land uses."</p>	<p>Agriculture can only be viable with a healthy open space watershed.</p>	105-14P

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Friends of the Napa River comments regarding the Draft Napa County General Plan and the Draft Environmental Impact Report, 06/18/07

#	Item and location in Draft General Plan	Suggested Recommendations	Reasons	
14	<p>Page 33: Ag/LU Goal 4</p>	<p>Blend current LU Goal 4 with the new Ag/LU Goal 4 to read: "To work with cities, other governmental units and the private sector to plan for commercial, industrial, residential, recreational, open space and public land uses in locations that are compatible with adjacent uses, agriculture and the protection of the Napa River watershed."</p>	<p>Working cooperatively with other jurisdictions and agencies is an important concept that should be retained in the new plan.</p>	105-15P
15	<p>Page 33: Ag/LU Goals</p>	<p>Retain current Goal 2 as an additional goal: "To develop and implement a set of planning policies which combine to define a population size, rate of population growth and the geographic distribution of that population in such a manner that the desired quality of life is achieved."</p>	<p>The current goal 2 is well understood and should be retained.</p>	105-16P
16	<p>Page 34: Measure J</p>		<p>Acknowledges the effectiveness of Measure J & support its continuation.</p>	105-17P
17	<p>Page 36: Policy Ag/LU-18: The following standards shall apply to lands designated as Agriculture, Watershed, and Open Space.</p>	<p>Add language to specifically address protection and enhancement of watershed and open space.</p>	<p>The proposed language does not seem to address issues of watershed and open space protection and enhancement which should be added.</p>	105-18P
18	<p>Page 39: Ag/LU 20: "already developed areas"</p>	<p>Replace with "urban areas"</p>		105-19P
19	<p>Page 40: Ag/LU-28</p>	<p>Delete reference to "transitional" designation.</p>	<p>The specific plan process is very adequate to address these areas.</p>	105-20P
20	<p>Page 43: Ag/LU-37 The properties known as the "Hess Vineyards" shall...</p>	<p>Change to make the zoning and use designation identical.</p>	<p>Having the zoning and the use consistent with the Ag/LU Goal 1: "Preserve existing agricultural land uses."</p>	105-21P
21	<p>Page 47: Policy Ag/LU-47: The following standards...as Transitional on...</p>	<p>County should determine appropriate land use. Delete the "Transitional" Land use designation.</p>	<p>Using a "transitional" designation does not give the community the ability to be proactive in land use planning of these significant parcels.</p>	105-22P
22	<p>Page 49 through Page 84: Policies Specific to Geographic Areas of Napa County</p>	<p>The County should eliminate the use of "Urban Bubble" entities and related policies throughout the County.</p>	<p>Creating incipient cities ("Urban Bubbles") not only compromises the natural functioning and integrity of the watershed, they also do not correlate with the existing topography and environment. "Urban Bubbles" are unclear and in conflict with current and draft GP Goals. Now is the time to remove them from the Plan.</p>	105-23E/P

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3.0 COMMENTS AND RESPONSES TO COMMENTS

Friends of the Napa River comments regarding the Draft Napa County General Plan and the Draft Environmental Impact Report, 06/18/07

#	Item and location in Draft General Plan	Suggested Recommendations	Reasons	
23	Page 86: Policy Ag/LU-109: "With the proviso that no rights are absolute...that private ownership provides valuable incentives for the proper care..."	Remove any such proposed statements in their entirety.	State and Federal private property rights supersede local actions. No Examples of "valuable incentives" are presented to support this premise, nor is there any recognition of the negative consequences of some landowners possibly seeking to maximize profit without regard to the environment (for example neglecting the costs of proper erosion controls thereby threatening our watershed.)	105-24P
Circulation Element				
24	Pages 132-133: Circulation Goal 3 references "water transport". The emerging role of the river as a waterway, with mixed uses, is nowhere stated. It must be.	Add: Recreation in both small and larger craft (kayak, sail and power), shuttle transportation within the navigable reach from Kennedy Park to downtown Napa, passenger and (possibly) goods transport from San Francisco, Vallejo and other points on the Bay. The increasing mix of speed and size sharing the river requires new specific policies to ensure efficient and safe expansion of water traffic (including enforcement).	As the Napa River Flood Control & Restoration Project finishes there will be increased water traffic with its positive and negative consequences. The potential importance of the use of the Napa River as a waterway will contribute significantly to quality of life and to the economy should also be expressed up top in the Vision and Goals sections.	105-25P
Community Character Element				
25	Page 135: There are no references to the Napa River and its watershed as part of the Community Character of Napa County.	Add such references to the Napa River and its watershed.	The elements in Napa County that make up its community character should include the rivers, the lake, and the watersheds with their integral parks and open space.	105-26P
Conservation Element				
26	Page 167, p-3 <u>By minimizing erosion from construction and agricultural activities...</u>	Add: <u>By minimizing erosion and contamination from construction and agricultural activities...</u>		105-27P
27	Page 169:	The plural of steelhead is steelhead, not steelheads.		105-28P
28	Page 170: 3 rd and 4 th paragraphs	3 rd and 4 th paragraphs should be in reverse order.	The current order suggests that regulations are more of a concern than a healthy functioning watershed.	105-29P

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Friends of the Napa River comments regarding the Draft Napa County General Plan and the Draft Environmental Impact Report, 06/18/07

#	Item and location in Draft General Plan	Suggested Recommendations	Reasons	
29	Pages 170-177	Add information that may be pertinent to the narrative.	Chinook salmon were likely historically in the Napa River in small numbers, if only straying from other systems. The recent appearance of Chinook salmon in the Napa River coincides with the Ocean Salmon Enhancement Program (funded largely by the Salmon Trollers). This program releases fish into San Pablo Bay from Central Valley hatcheries, without an opportunity to imprint on downstream emigration. When they return to spawn, the high rate of straying has led to significant Chinook returns in such questionable habitats as Walnut Creek (up to 8K). The Napa River is not as poor a habitat as Walnut Creek, though the fall run fish typically spawn low in the watershed (e.g., Rutherford) and the juveniles may be limited in spring by high stream temperatures.	105-30E/P
30	Page 171: "Living River Principles"	Add Living River Principles to glossary: A "living" Napa River system functions properly when it conveys variable flows and stores water in the floodplain, balances sediment input with sediment transport, provides good quality fish and wildlife habitat, maintains good water quality and quantity and provides recreation and aesthetic values. A "living" Napa River conveys equilibrium and harmony with all that it touches and resonates this through the human and natural environment." The overall objective is to maintain a long-term, sustaining river ecosystem.	The Living River Principles (LRP) need to be understood and incorporated into the GP.	105-31P

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3.0 COMMENTS AND RESPONSES TO COMMENTS

Friends of the Napa River comments regarding the Draft Napa County General Plan and the Draft Environmental Impact Report, 06/18/07

#	Item and location in Draft General Plan	Suggested Recommendations	Reasons	
31	Page 177: Water supplies: Missing dependencies and effects of Global Warming.	The GP language and policies need to reflect that the present level of water use in Napa County depends on imported water. SWP deliveries depend on all of the following: a) current snow pack scenarios b) current sea levels c) the state of the Bay-Delta ecosystem remaining somewhat healthy. Climate change or even extended drought will stress water delivery systems to the breaking point.	It is very likely that we will have a problem sustaining our level of importation due to environmental change. It is obviously even more of a problem to increase our supplies needed with the plan's growth projections. There is a strong likelihood that erratic and depleted water supplies are projected to be an impact of global warming with in the life of this GP. We need policies requiring both scientific and on-site monitoring that will give advance warning, as well as policies that set a strategy for adaptation to the challenges and changes. Since water shortages will impact everyone and everything in Napa County, policies also needed to educate the public, and with mandatory rules and incentives involve every segment of the community in water preservation and 'green' lifestyles and business practices - with the County itself setting the model and the example.	105-32E/P
32	Page 178: "The 2050 Study..." (Concerning the use of recyclable water.)	The DGP and the DEIR needs to be required to demonstrate that existing water use levels from all sources are sustainable in future climate scenarios, especially in dry years and demonstrate that the projected growth in domestic consumption is feasible. The County needs to address that further ground water extraction, even in basins not presently showing decline, may reduce summer flows.	Resulting lower water quality and quantity in the river and its tributaries will have a serious impact. The MIKE SH-E assumptions and projections should be tested thoroughly before being relied upon as a guide to the future scenarios envisioned in the DGP. The 2050 Study assumes too much of a "business as usual" scenario to be credible or useful as a planning tool. Reuse of recyclable water is not optional, yet the County government itself treats not a drop of water (waste water treatment is in the cities only.) Where is the requirement for dual plumbing of any development that can possibly use such a system?	105-33E/P

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Friends of the Napa River comments regarding the Draft Napa County General Plan and the Draft Environmental Impact Report, 06/18/07

#	Item and location in Draft General Plan	Suggested Recommendations	Reasons	
33	Page 187: 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 wild vegetation and natural beauty.	Add: forest, recreation, wildlife migration corridors, flood control. Add: Measures that will ensure that this policy is followed.	The need for wildlife corridors is noted on page 191 under Natural Resource Goals, but is not mentioned relative to the grazing and agricultural programs. Such an important goal that is fundamentally dependent on actions within these programs should be listed as one of the program goals so the need for conservation of these wildlife corridors is carried the document. Wildlife corridors are also not listed specifically for the Open Space Conservation Goals. If Sonoma Valley can do this in an area as valuable as the Grace Benoit Vineyard, Napa County should be able to do it in all newly planted areas.	105-34E/P
34	Page 189: (New goal needed)	There should be a primary conservation goal listed as follows: CON-# "The County will identify wildlife corridors that connect habitats and will act to retain their value."	The original policy was much more effective in protecting ecologically sensitive areas and those areas with safety concerns.	105-35E/P
35	Page 189: Policy Con-4: The County will define and identify ecologically sensitive areas and will act to retain their values.	Replace Policy Con-4 with: "Within the first year after adoption, the County will identify in consultation with CDFG and the Napa County RCD ecologically sensitive areas. The County will enact and enforce regulations which will limit development in ecologically sensitive areas, such as those adjacent to river or streamside areas, and physically hazardous areas such as floodplains, steep slopes, high fire risk areas and geologically hazardous areas" (Use wording from 1983 GP Ag/LU policy 1.2)	Note: The Implementation Plan link in the General Plan webpage leads to the Glossary and not to the Implementation Plan, so it is difficult to see how this will be done or if there is a project timeline to develop a definition for "ecologically sensitive areas."	105-36E/P
36	Page 191: Goals CON-4 & CON-5:	To ensure riparian and wildlife habitat preservation and connectivity stronger measures than Policy 8 & 9 will be required.	The verbs to "seek to" and "shall encourage" are pretty weak statements that will have a hard time standing up to the forces of vineyard expansion and population growth.	106-37E/P

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3.0 COMMENTS AND RESPONSES TO COMMENTS

Friends of the Napa River comments regarding the Draft Napa County General Plan and the Draft Environmental Impact Report, 06/18/07

#	Item and location in Draft General Plan	Suggested Recommendations	Reasons
37	Page 193: Policy CON-14: Such mitigation <u>measures may include</u> providing and permanently maintaining similar quality and quantity of replacement habitat areas or paying in-kind funds to an approved wildlife habitat improvement and acquisition fund.	Replace with <u>measures shall include</u>	Clearer.
38	Page 199: Goal CON-6: Reduce or eliminate groundwater and surface water contamination....	Add: The plan needs an active policy, as already exists in western Marin County, to help owners of septic tanks ensure that they are working properly and to repair them if they are not.	Septic tank failure in the unincorporated area of the county is an avoidable contamination of ground water and should not persist. There will probably need to have a funding mechanism in place.
Conservation Element: General Comments			
39	There is no mention of the preservation of the rich benthic macro-invertebrate fauna present in the river and its tributaries. Background: The river and its tributaries have been pushed away from a healthy and sustainable state by changes in land use, channelization (separation from floodplain), loss of coarse sediment from impoundments, dams large and small and elimination of its riparian corridor in most of its main stem and many of the tributaries. Incision into its bed will continue to compromise its biological value without policies to reverse some of the damage and the processes that have led to the damage.	Add: The GP needs to include policies to preserve the rich benthic macro-invertebrate fauna present in the river and its tributaries.	These taxa are both indicators of environmental quality and the base of the aquatic food chain. They are essential to nutrient and energy cycling, and yet their importance, and policies promoting their preservation and enhancement receive scant or no attention in the policy statements. An example, the long-term future gallery forest that remains is in doubt because of incision, especially during high flow events. Without active steps like the Rutherford Dust restoration, the main stem will continue to deteriorate. The extensive levee system on the main stem is not sustainable because of its effect on the hydrograph and on geomorphology.
Recreation and Open Space Element			

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Friends of the Napa River comments regarding the Draft Napa County General Plan and the Draft Environmental Impact Report, 06/18/07

#	Item and location in Draft General Plan	Suggested Recommendations	Reasons
40	Page 232: Recreational Facilities - Under the definition of recreational facilities, there is no mention of docks, ramps, small-boat launching facilities, or other public access to rivers, lakes, and bays.	Add (suggested): The General Plan also needs to describe the "Bay Area Water Trail," with specific policies for County support. As a partner in the Flood Project of acquisition of land and/or easements for access points to the river, for continuation northward of the Napa River Trail for walkers and cyclists, safety, docking and launching facilities, connectivity to transportation routes, inter county-city co-operation, etc. that expand public access.	A "water trail" consists of a series of launch and recovery sites for hand-launched watercraft (kayaks, canoes, etc) Such a regional trail has already been established through State Legislative action. Details on trail development (conditions) can be negotiated later. Napa County can then suggest rules for trail sections most likely for the Bay Area Ridge Trail (BART) such as for steep, erosion-prone sites or to designate for hikers and equestrians only. Limiting use is a hot-button issue, so it is easier if it is stated up front that there are options. BART use can be limited; an example is that a piece of EBMUD lands limits trail use to not allowing bicycles.
41	Page 245: Figure ROS-1 Map	Map needs to show the Napa River.	
42	Page 253: Figure ROS-4 Trail Network	List the Bay Area Ridge Trail segment, which has been approved through the town of Yountville, on the map!	
43	Page 254: Policy ROS-10: Trails	Need a clear statement to protect seasonal habitat (nesting) along waterways. Also, as it reads it appears that trails are only in the woodlands and hills not along the river.	
44	Recreation and Open Space Goals & Policies - General Comment:	The County should include the City of Napa's River Development policies, perhaps as an addendum, and should state as policy that it will use the City's policies as a guide to co-operative and compatible development and activities along the Napa River, particularly where city and county interests interface (Napa Pipe as an example).	Policies of both the City and the County need to be compatible to maintain and enhance the health of the Napa River.

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3.0 COMMENTS AND RESPONSES TO COMMENTS

LETTER 105: BERNHARD KREVEK, FRIENDS OF THE NAPA RIVER, JUNE 18, 2007

Response 105-1 E/P: Commenter provides several major concerns with the draft General Plan and the Draft EIR. These concerns include significant expected effects to the Napa River and its watershed as a result of projected growth in the County; inadequate policies to improve the health of the river and its watershed; lack of goals and policies to monitor, analyze, and mitigate the projected climate change impacts; inadequate discussion of the river's role as a significant biologic, recreational, and esthetic factor for quality of life in the County; problems relating to the use of "transitional designation" and "urban bubbles" as they relate to protection of the river, its watershed, and open space as a whole; and the commenter's opinion that the Draft EIR inadequately addresses the General Plan. The County appreciates the concerns of the Friends of the Napa River (FONR) and believes they have been addressed in revisions to the General Plan Update and in this Final EIR. Text and policies in the Conservation Element have been revised to highlight issues related to the Napa River, and Policy CON-46 and CON-47 provide additional specificity. Also, the Revised General Plan Update (the "Preferred Plan" in this Final EIR) would result in population and employment numbers similar to the No Project Alternative; it calls on the County to systematically address the "bubbles" (Action Item 114.1), and it has rejected the "transitional" designation in favor of the term "Study Area" (Policy Ag/LU-52). Policies related to climate change have been added, including a specific policy related to monitoring the environmental effects of climate change (Policy CON-73), and numerous policies address the biologic resources that affect the quality of life in Napa (Policy CON-10 et seq.). Please also see policies in the Community Character and Recreation and Open Space Elements regarding issues related to aesthetics and recreation.

Response 105-2 P: Commenter asks that the words "already developed areas" in the Summary Vision on page 14 of the General Plan be replaced with "incorporated Cities and urbanized areas." Commenter also asks that the words "the environment" be replaced with the words "the natural environment." The County appreciates the commenter's input on this issue. These changes have been made in Policy Ag/LU-22, -23, -26, -28, and -30, and elsewhere in the Revised General Plan Update. The Summary/Vision section has been substantially revised.

Response 105-3 P: Commenter asks that the words "already developed areas" in the Summary Vision on page 15 of the General Plan be replaced with "urbanized areas." See Response 105-2 P.

Response 105-4 P: Commenter asks that the sentence on page 16 of the General Plan immediately following "Napa County in 2030 . . ." read as follows (inserted text shown underlined): "This General Plan will preserve and improve the quality of life and the rural character of the County by proactively addressing land use, traffic, and safety concerns as well as the natural resources/environment which underlies and sustains the County's health and prosperity in addition to sustaining the agricultural industry." The County appreciates the commenter's input on this issue. The Summary

3.0 COMMENTS AND RESPONSES TO COMMENTS

section of the General Plan Update has been substantially re-written based on the commenter's comments and others.

Response 105-5 P: Commenter asks that the following text be added to the Summary Vision on page 16 of the General Plan: "This Plan will also encourage sustainable, energy efficient, and non-polluting building design and construction practices to insure that Napa takes a leadership role in promoting resource protection and conservation." The County appreciates the commenter's input on this issue. Similar text has been included in the Summary section under the description of the Conservation Element.

Response 105-6 E/P: Commenter requests the vision statement on page 19 of the General Plan read as follows (inserted text underlined): "The Napa River and its tributaries will increasingly run clean and healthy . . ." The County appreciates the commenter's input on this issue. This change has been included in the Conservation Element in the Water Resources section.

Response 105-7 P: Commenter requests the words "is also an" be replaced with "will continue to be" in the vision statement on page 19 of the General Plan, to read as follows: "The river will continue to be an important natural resource . . ." The County appreciates the commenter's input on this issue. This discussion has been deleted from the Summary section and similar language can now be found in the revised Conservation Element.

Response 105-8 E/P: Commenter requests deletion of the words "such as cutthroat trout" on page 19 of Summary Vision and the addition of the following text in its place: "...and endangered species as well as a resource that serves the needs of the human habitat as stated in the text of "The Living River Principles." The County appreciates the commenter's input on this issue. This discussion has been deleted from the Summary section and similar language regarding the living river principles can now be found in the revised Conservation Element.

Response 105-9 P: Commenter asks that the word "watershed" be added to the sentence in the vision statement on page 19 of the General Plan after the words "the Napa River" to read as follows (inserted text underlined): "The General Plan contains specific policies and steps to improve the health of the Napa River watershed and help restore its natural populations . . ." The County appreciates the commenter's input on this issue. This discussion has been deleted from the Summary section and similar language can now be found in the revised Conservation Element.

Response 105-10 P: Commenter asks that the entire sentence starting with "A healthier river will invite more visitors . . ." on page 19 of the General Plan be replaced with the following sentences: "A healthier river will attract more residents and visitors for recreation, boating, walking, and observing the wildlife and the natural beauty. The General Plan recognizes the growing importance of the Napa River and its watershed to the County's residents and tourists as an important recreational opportunity, flood management tool, and a boon to our economy and quality of life." The County appreciates the commenter's input on this issue. The summary section has been

3.0 COMMENTS AND RESPONSES TO COMMENTS

substantially revised in response to the commenter's suggestions and others.

Response 105-11 P: Commenter asks that the words "construction and farming activities" be added to the sentence beginning "These policies build on the work of the "TMDL" process . . ." on page 19 of the General Plan to read as follows (inserted text underlined): ". . . to reduce impacts created by septic tank failures, erosion, construction and farming activities, and sediment build-up in the county's waterways." The County appreciates the commenter's input on this issue. This discussion has been deleted from the Summary section, but please see policies in the Conservation Element, including Policy CON-47.

Response 105-12 P: Commenter notes that page 19 of the General Plan does not include any information on "living river principles." The commenter provided two paragraphs to be inserted in the vision statement. See Response 105-8 E/P.

Response 105-13 P: Commenter asks that the vision summary on page 22 of the General Plan include the following: "The County will adopt goals and policies to monitor, assess and mitigate where possible significant impacts from global warming." The summary section has been substantially rewritten and now contains a reference to climate change. Also see language, goals, and policies in the revised Conservation Element.

Response 105-14 P: Commenter asks that the words "land and agricultural watershed/open space" be added to Ag/LU Goal 1 to read as follows (inserted text underlined): "Preserve existing agricultural land and agricultural watershed/open space land uses."

Goal Ag/LU-1 has been amended to read as follows: "Preserve existing agricultural land uses and plan for agriculture and related activities as the primary land uses in Napa County." Note that several policies in the Conservation Element support the preservation of agricultural watershed/open space land. Related policies include Goal CON-1, Policy CON-4, Policy CON-5, Policy CON-41, Policy CON-42, and Policy CON-50.

Response 105-15 P: Commenter asks that Ag/LU Goal 4 be combined with the existing LU Goal 4 to read as follows: "To work with cities, other governmental units and the private sector to plan for commercial, industrial, residential, recreational, open space and public land uses in locations that are compatible with adjacent uses, agriculture and the protection of the Napa River watershed."

Goal Ag/LU-4 has been amended to read as follows: "Work with cities, other governmental units and the private sector to plan for commercial, industrial, residential, recreational, and public land uses in locations that are compatible with adjacent uses and agriculture." Note that several policies in the Conservation Element support the protection of the Napa River watershed. Related policies include Policy CON-46, -47, Action Item CON WR-1, and Policy CON-42.

Response 105-16 P: Commenter asks that the currently adopted Ag/LU Goal 2 be included in the Goals of the General Plan Update.

3.0 COMMENTS AND RESPONSES TO COMMENTS

A new Ag/LU Goal has been added to retain the goals of the current Goal Ag/LU-2: "Develop and implement planning policies which define a rate of population growth that perpetuates our quality of life." (Revised version of Former Land Use Goal 2).

Response 105-17 P: Commenter notes for Ag/LU Element on page 34 to leave Measure J as is. The commenter's statement associated with this issue is understood. No change has been made to Measure J.

Response 105-18 P: Commenter asks that language be added to Policy Ag/LU-18 to address protection and enhancement of watershed and open space. The intent of Goal Ag/LU-18 has been amended to read as follows:

"Intent: To provide areas where the predominant use is agriculturally oriented; where watersheds are protected and enhanced where reservoirs, floodplain tributaries, geologic hazards, soil conditions and other constraints make the land relatively unsuitable for urban development;...and erosion is essential to the general health, safety, and welfare." (Note: This text is abbreviated, but derived from Measure J)

The number on this policy has been changed to Ag/LU-20.

Response 105-19 P: Commenter asks that the words "already developed areas" be replaced with "urban area" in policy Ag/LU 20. Ag/LU-20 has been amended to read as follows:

"Urban uses shall be concentrated in the incorporated cities and designated urbanized areas of the unincorporated County in order to preserve agriculture and open space, encourage transit-oriented development, conserve energy, and provide for healthy, "walkable" communities."

The number of this policy has been changed to Ag/LU-11.

Response 105-20 P: Commenter asks that the reference to "transitional" designation be removed from Policy Ag/LU-28. County staff has recommended a change from "transitional" to "study area." Policy Ag/LU-28 has been amended to read as follows:

"...In addition to working with the State and ABAG to reduce the County's regional allocation, these strategies shall include:

- Considering Transitional re-use of former industrial sites designated as "Study Area" on the Land Use Map to provide for a mix of uses, including affordable and market rate work force housing as appropriate.

The number of this policy has been changed to Ag/LU-30.

Response 105-21 P: Commenter asks that Policy Ag/LU-37 ensures the land use and zoning designation for the Hess Vineyards remains agricultural, consistent with Ag/LU Goal 1. The proposed General Plan Update has been revised and now identifies a "Preferred Plan" (see Section 2.0 of this document for a

3.0 COMMENTS AND RESPONSES TO COMMENTS

detailed description). The Preferred Plan proposes that the Hess Vineyards property be designated Agriculture, Watershed and Open Space (AWOS).

Response 105-22 P: Commenter requests that the "transitional" designation be eliminated from Policy Ag/LU-47 and that specific land uses be determined for these areas. The proposed General Plan Update has been revised and now designates lands as Study Area and does not include the Transitional Land Use. The Study Area land use designation would allow for future consideration of land use changes to the site. However, the General Plan Update does not establish any use of the site beyond industrial.

Response 105-23 E/P: The commenter requests that the use of "urban bubbles" and related policies be eliminated from the General Plan. County staff does not believe that elimination of all the bubbles is feasible for reasons outlined in the Alternatives Master Response 3.4.2; however the Revised General Plan Update (referred to as the "Preferred Plan" in this Final EIR) adjusts the boundaries of the Angwin and Berreyssa Estates bubbles, and commits the County to systematically examine the others in the years following the General Plan Update (Action Item Ag/LU-114.1).

Response 105-24 P: Commenter asks that any reference to the valuable incentives of private ownership in Policy Ag/LU-109 be removed. The County appreciates the commenter's input on this issue. However, County staff recommends leaving the policy intact and believes that the proposed General Plan strikes an appropriate balance between private property rights and responsibilities of County government.

Response 105-25 P: Commenter provides additional language to be added to the General Plan regarding the potential importance of the use of the Napa River as a waterway. A sample paragraph is provided by the commenter. The County appreciates the commenter's input on this issue. The intent of this language is included in goals, policies and action items of the Conservation Element.

Response 105-26 P: Commenter notes that the Community Character Element does not include any discussion of the Napa River and its watershed. Commenter requests such language to be added to the Element. The County appreciates the commenter's input on this issue. However, this language is included primarily within the Conservation Element.

Response 105-27 P: Commenter asks that the words "and contamination" be added to the third paragraph on page 167 of the General Plan to read as follows (inserted text underlined): "By minimizing erosion and contamination from construction and agricultural activities, the regulations protect . . ." This comment is addressed by the existing NPDES requirements and Conservation Element policies that address this requirement. (See Policy CON-47 and related policies.)

Response 105-28 P: Commenter notes that the plural of steelhead is "steelhead," not "steelheads" as it appears on page 169 of the General Plan. This typographical error has been corrected.

3.0 COMMENTS AND RESPONSES TO COMMENTS

- Response 105-29 P:* Commenter requests that the order of the third and fourth paragraphs on page 170 of the Conservation Easement be reversed. This change has been made in the Introduction.
- Response 105-30 E/P:* Commenter provides additional historic and current information regarding Chinook salmon in the Napa River. Commenter requests this information be included in the narrative presented on pages 170 through 177. Pertinent information regarding Chinook salmon in the Napa River is included in the revised General Plan Update Conservation Element under the section for the Napa River Watershed.
- Response 105-31 P:* Commenter requests the addition of the "Living River Principles" to the glossary on page 171 of the General Plan. A footnote has been added after the first use of the term "Living River Principles" in the General Plan that provides a definition of those principles.
- Response 105-32 E/P:* Commenter states the General Plan does not include discussion of the dependencies of County water supply and the effects of global warming. Commenter requests that language and policies on page 177 reflect the present level of water use dependent on imported water. The commenter is referred to Water Supply Master Response 3.4.1, Climate Change Master Response 3.4.4, and the new section in the revised Conservation Element entitled Climate Protection and Sustainable Practices for Environmental Health.
- Response 105-33 E/P:* Commenter notes that the DGP and the Draft EIR need to demonstrate that existing water use levels from all sources are sustainable in future climate scenarios. The commenter is referred to Water Supply Master Response 3.4.1 and Climate Change Master Response 3.4.4. Please also see Policy CON-73.
- Response 105-34 E/P:* Commenter requests the preservation of "wildlife mitigation corridors" in addition to those areas to be preserve by Policy CON-1. Policy CON-1 has been revised to address this issue.
- Response 105-35 E/P:* Commenter requests the addition of a primary conservation goal that states "The County will identify wildlife corridors that connect habitats and will act to retain their value." A new policy has been added regarding limiting development in "ecologically sensitive areas" that generally addresses this request. Staff recommends against attempting to identify all wildlife corridors to retain value, as it would ultimately conflict with the primary Agricultural Preservation goal of the Plan and would encompass approximately 133,000 acres of the County. Commenter is referred to Biological Resources Master Response 3.4.3 for more information as well as Goal CON-7 and Policies CON-18, -20, and -25.
- Response 105-36 E/P:* Commenter requests that staff replace CON-4 with new policy language, based on Policy Ag/LU-1.2 as adopted in 1983, to identify ecologically sensitive areas. The comment is addressed in Action Items CON NR-1 through NR-6.

3.0 COMMENTS AND RESPONSES TO COMMENTS

- Response 105-37 E/P:* Commenter objects to use of "seek to" and "shall encourage" as used in Policies CON-8 and CON-9. In order to address this comment, Policy CON-14 and related Action Items have been modified.
- Response 105-38 E/P:* Commenter requests that the words "may include" be replaced with "shall include" in Policy CON-14. The text of CON-14 has not been modified in order to provide flexibility in selecting appropriate mitigation measures and strategies based on the particular situation. Regardless, the requirement for mitigation still applies.
- Response 105-39 E/P:* Commenter requests the language of Policy CON-6 be modified to provide an "active" policy to help owners of septic tanks ensure the tanks are working and repaired as needed. Policy CON-42 and related Action Items been revised to address this comment.
- Response 105-40 E/P:* Commenter requests the addition of policies to preserve the rich benthic macro-invertebrate fauna present in the river and its tributaries. Policy CON-11 and related Action Item have been revised in response to this comment.
- Response 105-41 P:* Commenter requests addition of language on Bay Area Water Trail and policies for County support of the trail. The County appreciates the commenter's input on this issue. This language has been included in the Recreation and Open Space Element.
- Response 105-42 P:* Commenter requests the addition of the Napa River and the Bay Area Ridge Trail segment approved through the Town of Yountville on Figure ROS-4 of the General Plan. All maps and figures have been reviewed and revised as necessary.
- Response 105-43 P:* Commenter requests that Policy ROS-10 include a clear statement to protect seasonal habitat along waterways and clarification of the existence of trails along waterways. The County appreciates the commenter's input on this issue. However, protection of seasonal habitat along waterways is generally addressed within the Conservation Element in policies that discuss buffers.
- Response 105-44 P:* Commenter requests inclusion of City of Napa's River Development policies in the Recreation and Open Space Element. The commenter's statement associated with this issue is understood. However, policies related to the City of Napa are beyond the jurisdiction of the unincorporated County. Land Use policies are included that discuss cooperation with the incorporated cities on issues of mutual concern.

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Letter 106

JUN-19-2007 12:17 AM LAVEAGA.

562 691 8817

P.01

**Carolyn C. Patterson
2 Entrada Court
American Canyon, California 94503**

June 18, 2007

VIA FACSIMILE & U.S. MAIL
(707) 299-4032

Mr. Patrick Lowe
Napa County Office of Conservation
Development and Planning
1195 Third Street, Suite 201
Napa, California 94559

Re: Comment on County Draft General Plan Update; Related Draft Environmental Impact Report

Dear Mr. Lowe:

This communication provides comments on the County of Napa (County) Draft General Plan Update (the Draft General Plan) and the Draft Environmental Impact Report (DEIR) for the Draft General Plan from a resident and taxpayer in the City of American Canyon (City) who is principally employed in the air transportation and aviation business.

106-1E/P

1.

INTRODUCTION

These comments are made based on a member of the public's understanding of the California Environment Quality Act (Public Resources Code section 21000 *et seq.*, CEQA), California Land Use Law and related County Planning documents, as well as conversations with City employees and review of City documents related to land use planning and development in the South County area as described in the Draft General Plan. To the extent that the specific authority is known for the comments advanced it is set forth.

106-2E/P

GA199.620LTR\Low (County Draft General Plan) 061807.wpd

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JUN-19-2007 12:17 AM LAVEAGA.

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P.02

Mr. Patrick Lowe
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It is this commentator's opinion that the review of documents dealing with planning in the South County area and the Draft General Plan is difficult. There is no integrated website available at the County for documents which are related to the Draft General Plan and DEIR. For example, the Housing Element, a required element of a legally adequate General Plan, but not part of the update, is not available online. Likewise, the County Airport Industrial Area Specific Plan (AIASP) is not obtainable except by independent research and effort. The same is true with respect to the Plan Update Baseline Data Report. It is therefore difficult for a normal citizen and member of the public to gain an understanding of all related documents to the County planning process so as to make comments on an informed basis. Likewise, the public meetings on the Draft General Plan repeat material that is available which are based on other County documents.

106-3E/P

2.

SUMMARY OF PRESENT DEFICIENCIES

Applying land use law principles and CEQA to the Draft General Plan and its DEIR, it is recommended that the Draft be supplemented to actually describe its relationship to the goals and policies of the existing Housing Element and the AIASP. Instead of just referencing the AIASP its consistency, or lack thereof, with the Draft General Plan should be explained. This will require revision of the project description in the DEIR. Because the project description should be revised, the analysis of project alternatives, mitigation measures and cumulative impact would also need to be revised requiring recirculation of the DEIR.

106-4E/P

3.

ANALYSIS STANDARDS

A. The California Environmental Quality Act

A primary purpose of CEQA is to inform governmental decision-makers – the County Board of Supervisors and of the public about the potential environmental effects of the involved action – here the adoption of a General Plan Update. In preparing an adequate EIR, the lead agency, here again the County, must include a project description that extends to all the activities that would ultimately result. *Santiago County Water Dist. v. County of Orange* (1981) 118 Cal.App.3d 818, 829. The project description must also include reasonably

106-5E

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3.0 COMMENTS AND RESPONSES TO COMMENTS

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foreseeable future activities that are consequences of the project. *Laurel Height Improvement Ass'n. v. Regents of the University of California* (1988) 47 Cal.App.3d 376, 394-395. A project EIR is an informational document which must identify significant impacts of the project, project alternatives and mitigation measures for decision-makers (public agencies) having control of approval of the project, the agencies and the public. *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68, 74-76; Public Resources Code section 21002.1(a).

CEQA requires that agencies "take all action necessary to protect, rehabilitate, and enhance the environmental quality of the State," (Public Resources Code section 21001(a)) which means that they must propose mitigation measures and alternatives to minimize the project's environmental impacts and agencies must respond by mitigating or avoiding the environmental impacts when it is feasible to do so. *Citizens of Goleta Valley v. Bd. of Supervisors* (1990) 52 Cal.3d 553, 576.

106-5E
Cont'd.

In accomplishing all these actions, the lead agency *must analyze* the impacts of a proposed General Plan revision on *the existing environment*. *Environmental Planning & Information Council v. County of El Dorado* (1982) 131 Cal.App.3d 350, 353-355 (*EPIC*).

An adequate EIR must also discuss growth-inducing impacts even though those impacts are not themselves a part of the project under consideration, and even though the extent of the growth is difficult to calculate. *Napa Citizens for Honest Government v. Napa County Board of Supervisors* (2001) 91 Cal. App. 4th 342, 368 (*Napa Citizens*).

B. General Plan Content and Consistency

California Land Use law requires that cities and counties have a General Plan which must contain mandatory elements including a Land Use Element, Circulation Element (which must be coordinated with the Land Use Element), a Housing Element and a Conservation Element, among others. Almost any local decision affecting land use and development depends upon consistency with the General Plan and its Elements. *Napa Citizens, supra* 91 Cal. App. 4th at 355. Also, a General Plan must be internally consistent. See, Government Code section 65300.5

106-6P

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4.
**AREAS OF THE GENERAL PLAN UPDATE
NEEDING REVISION**

A. Public Participation: Formation of the County GPSC

As a reasonably diligent member of the public, I read local newspapers. I do not recall any public notice calling for individuals to participate in the General Plan Steering Committee (GPSC) that is referenced in the Draft General Plan. In addition, given the significant ethnic make-up of both the County and the City – the County with a significant Mexican/American minority (25%) and the City with a significant Filipino minority (13%), an effort should be made to integrate representatives of those two communities of interest into the planning process. This would be consistent with the concept of “Environmental Justice” as is referenced in the *General Plan Guidelines* (2003) Chapters 2, 4 and 8. If the Plan is to reflect community goals as claimed (p. 2), there needs to be either a more complete description of how this was achieved or the GPSC membership needs to be supplemented to achieve the described community goals.

106-7P

The Draft General Plan does mention under abbreviated implementation policies at p. 86, the concept of social equity and environmental justice. However, because of the *absence* of any definitive implementation provisions, see p. 278, there is no indication as to whether the Draft General Plan will implement the issue of planning for significant minority classifications within the County. Also, it would seem given the issues which the County has with the farm-working community to service the wine industry, there should have been or if there has been a description of the effort to gain the participation of California Rural Legal Assistance Association for formulation of goals and policies given the past litigation with County on the adequacy of farm-worker housing. As a taxpayer, these seem like common sense actions which are not reflected in the Plan Update documents reviewed.

Separate from the ethnic and racial communities identified, it is unclear how the aviation community, not just the County Airport Land Use Commission, was involved in the Draft preparation.

106-8P

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3.0 COMMENTS AND RESPONSES TO COMMENTS

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B. Existing Conditions

As the Draft General Plan must be evaluated with respect to *existing uses*, it is unclear how the leasing of space at the Airport under either the AIASP or the Draft General plan would be accomplished and implemented. Normally, economic considerations are not associated with an environmental analysis. However, because of the claimed integration in the Draft General Plan between the need to maintain the Napa County Airport (p. 74 -- without explanation) and a need to evaluate the project based on existing uses, it is unclear how the leasing policies are for use of the Airport facilities in such a manner as to facilitate the greater project goals of preservation of the wine industry within the County.

106-9E/P

C. Lack of Clear Consideration of the Napa County Airport Industrial Area Specific Plan

The AIASP was adopted on July 29, 1986 and has been amended several times since its adoption recognizing South County and the Airport specifically as an area attractive for aviation oriented business and the development of airport related industry as a "major employment center." AIASP, Section I.B.5 & 6. Among the Plan objectives are to implement a regional program for road access and improvements and to maintain compatibility between the AIASP Planning Area land uses and Napa County Airport activities. AIASP, Section I.C.3 & 4.

Additionally, the AIASP requires maintaining a logical relationship between planning area, job creation, residential growth limitations in the County's residential Growth Management System. AIASP, Section I.C.11. The goals emphasize the regional nature on integrated planning as follows:

106-10E/P

16. In light of their interregional, regional and local benefits, plan-specified regional access improvements should be jointly funded by CalTrans, the county (through future countywide development fees), and planning area landowners through special assessments.

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The extent of airport operation itself is noted to reach 375,000 operations by 2000. The land use policies also require agricultural and permanent open space zones which are the clear zone lands on the four ends of the airport runway approaches. AIASP, Section I.D.

The AIASP emphasizes a specific regional circulation policy (AIASP, Section I.E.) as well with respect to public facilities (AIASP, Section I.F.). It notes that water supply for the area should be divided between the Napa Municipal Water District and the American Canyon County Water District (now the City) and that the dividing line between these two agencies should be Suscol Creek. The Water Service Policies in the Plan are to be implemented through a Water Facilities Master Plan by both the Napa Municipal Water District and the American Canyon County Water District (now the City). The AIASP also sets forth specific policies concerning Growth Management. AIASP, Section I.G.

106-10E/P
Cont'd.

The point of raising the issue of the content of the AIASP is to show that its "footprint" goes to a much larger area than its contemplated boundaries and was adopted based on a finding of consistency with the General Plan that now is proposed to be changed yet there is no indication as to how or whether consistency with the Draft General Plan exists or if it does not exist, how it would be achieved.

This relates to the issue of project segmentation. If in fact the AIASP is to be changed then that action should be accomplished now as an implementation measure of the General Plan Update and not "segmented" as is prohibited by CEQA.

D. Implementation Actions Are Unknown

The exclusion of discussion of AIASP and also the Housing Element¹ to the planning revision relates to the issue of implementation of the policies of the Draft General Plan. Implementation in several sections of the General Plan [which is a mandatory duty under Government Code section 65103(a)] is represented inconsistently. For example, on page 12

106-11P

¹The Housing Element is noted (p. 3) as being updated in 2005. However, the balance of the Draft document analysis does not indicate how its goals and policies would be internally consistent with those in the existing Housing Element.

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under the heading "Implementation of This General Plan" the following is indicated:

Future work will be needed to fully implement this General Plan. *These actions are listed in the Implementation section of this General Plan.* Some of these actions may occur in the short term; others will require more time and resources and may not be completed for some time. (Emphasis added.)

A review of the "Implementation Section" of the Draft General Plan," p. 278, provides:

The section will be prepared *after the public review process* and included in the final general plan submitted for adoption to the Board of Supervisors. (Emphasis added.)

It is unclear *how* the policies of any of the updated elements, much less their implementation with areas of land use would be achieved unless they are presented now.

The issue of implementation is further confused by footnote 6 on p. 23 in a "Note to the Reader" indicating that:

The implementation section of a plan will be developed following public review of the Draft Elements and the Draft Environmental Impact Report (EIR). The implementation Section will (1) repeat the action items included in each individual element; and (2) articulate strategies for monitoring or measuring the success of the plan over time. Suggestions regarding the format and content of this section are welcomed.

A member of the public trying to understand what is actually being planned because of the lack of an Implementation Section is left to speculate as to whether and how the General Plan Policies would be implemented.

106-11P
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E. Internal Inconsistencies

A property designation which demonstrates internal inconsistency of what is planned is the Hess Vineyard Property, an area within the South County area. The Draft General Plan DEIR (pp. 3.0-13-14) in describing Alternative A refers to the Hess Vineyard Property in the sentence that it refers to the Napa Pipe site as a property that would retain its industrial designation. Also, the Draft General Plan DEIR (p. 3.0-24) in the same paragraph that it mentions Napa Pipe, mentions the Hess Property as staying as a vineyard rather than being redesignated as industrial and retained its agricultural designation as is confirmed in the following DEIR figure 3.0-6. It is unclear *how* retaining industrially designated land in the South County area is consistent with the issue of agricultural preservation, an actual proposed action to be taken within the General Plan.

106-12E/P

F. Lack of Analysis of Jurisdiction of San Francisco Bay Conservation and Development Commission

Several areas of the Draft General Plan including several within the South County area are within the jurisdiction of the San Francisco Bay Conservation and Development Commission. There is no indication in the Draft General Plan how cooperation with that State Agency would be achieved to implement several policies.

106-13P

S.
CEQA DEFICIENCIES

A. Project Description Review

The need to properly describe the Plan updates to the AIASP and the Housing Element will necessitate a revision to the DEIR project description and following revised analysis of project alternatives, mitigation and cumulative impacts.

106-14E/P

B. Global Warming

The DEIR, Section 4.8 contains a discussion on air quality associated with the Draft General Plan. It mentions greenhouse gases and climate change linkages on page 4.8-11 and

106-15E/P

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Assembly Bill 32 on 4.8-14 but the summary is inaccurate as it does not indicate that the legislation requires the formulation of carbon dioxide standards to be formulated by the Air Resources Board by no later than January 1, 1980. Accordingly, there needs to be an analysis based on those standards as there is presently with nitrogen dioxide, sulfur dioxide, etc., again assuming that there is an accurate project description properly relating the AIASP and the Housing Element to the other provisions of the General Plan Update.

106-15E/P
Cont'd.

6. **SUMMARY**

Applying land use law principles and CEQA to the Draft General Plan and its DEIR, it is recommended that the Draft be supplemented to actually describe its relationship to the goals and policies of the existing Housing Element and the AIASP. Instead of just referencing the AIASP its consistency, or lack thereof, with the Draft General Plan should be explained. This will require revision of the project description in the DEIR. Because the project description should be revised, the analysis of project alternatives, mitigation measures and cumulative impact would also need to be revised requiring recirculation of the DEIR.

106-16E/P

Sincerely yours,

15/

Carolyn C. Patterson

CCP:

cc: Mayor Leon Garcia
City of American Canyon

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LETTER 106: CAROLYN C. PATTERSON, JUNE 18, 2007

Response 106-1 E/P: Commenter notes that comments are provided from an American Canyon resident employed in the transportation and aviation business. The County appreciates comments on both documents.

Response 106-2 E/P: Commenter notes that comments are based on CEQA and California Land Use Law and County Planning documents as well as conversations with City staff. County staff is appreciative that relevant sources are cited for comments.

Response 106-3 E/P: Commenter notes that a review of documents dealing with planning in the South County area is difficult and states that there is no integrated Web site for documents related to the Draft General Plan and Draft EIR. County staff notes that a Web site for the General Plan Update process was established with an online library of related materials and documents to make information processing easier on members of the community and other interested parties. Documents not available on that Web site may be available on the County's general Web site, or may be available for review at County offices upon request. County planners have tried to make all relevant documents easily available and cite the location of all documents referenced in the EIR. There is no legal obligation for the County to put all reference documents in a single location on the Internet.

Response 106-4 E/P: Commenter suggests that the Draft General Plan should be supplemented to describe its relationship to the goals and policies of the existing Housing Element and the AIASP. This would require revision of the project description in the Draft EIR. The existing Housing Element and the 1986 AIASP are incorporated by reference into the draft of the proposed General Plan Update and referenced as well in the Draft EIR (see Sections 4.3 and 4.4). County staff does not find that the project description requires modification to describe this relationship in more detail.

Response 106-5 E: Commenter notes that Section 3.0, Project Description, of the Draft EIR should extend to all the activities that would ultimately result in reasonably foreseeable future activities and explains other CEQA requirements. As the nature of the proposed project is a General Plan document, the Draft EIR analyzes this planning document on a programmatic level. The reasonably foreseeable future activities/ projects were included in each of the three major alternatives as well as the two alternatives analyzed at a lesser level of detail. All reasonably foreseeable outcomes associated with adoption and implementation of the General Plan Update have been identified, impacts have been compared to the existing environmental setting, and mitigation measures have been identified to address potentially significant impacts. County staff deems the project description and the EIR to be adequate under CEQA, and the commenter fails to identify aspects of the project or impacts that are not addressed.

Response 106-6 P: Commenter notes the required General Plan elements by Land Use Planning Law and that the Plan must be internally consistent. The County appreciates the information provided by the commenter and believes

3.0 COMMENTS AND RESPONSES TO COMMENTS

that adoption of the Revised General Plan Update would result in a legally adequate document. No change in the General Plan is required.

Response 106-7 P: Commenter asserts that certain interest groups have not been provided adequate notice or opportunities to participate in the formation of the General Plan, specifically in regard to minorities. The County solicited interest in the General Plan Steering Committee as required by County policy and has conducted substantial public outreach during preparation of the General Plan Update. At two points during the planning process, the County also engaged a consultant to conduct targeted outreach to the County's Hispanic community to ensure the plan would reflect the views of the entire community. Please see policies related to social equity in the Agricultural Preservation and Land Use Element (p. 70 of the Revised General Plan Update) and information regarding farm worker housing in the existing Housing Element.

Response 106-8 P: Commenter states it is unclear how the aviation community, not just the Airport Land Use Commission (ALUC), was involved in the preparation of the Draft General Plan. All Steering Committee meetings were open to the general public to take comments during preparation of the Draft General Plan, and the comment period for both the Draft GP and Draft EIR was extended to a total of 120 days to provide additional time for comments. Public notice was provided to agencies, interested organizations, and individuals in conformance with the law, and it is unclear which "aviation community" the commenter feels has been excluded from the planning process.

Response 106-9 E/P: Commenter asks how the leasing of space at the airport (Napa) under either the AIASP or the GPU would be accomplished and implemented and why economic considerations were not considered regarding existing uses and the facilitation of the greater project goals of preservation of the wine industry within the County. With adoption of the General Plan Update, leasing of space at Napa Airport could continue without change. Impacts of leasing activities at the airport and elsewhere in the AIA are assessed throughout the EIR, which assumes build-out of the existing 1986 Specific Plan under all EIR Alternatives. No physical environmental consequences related to economic considerations have been identified by the commenter.

Response 106-10 E/P: Commenter states it is not clear whether adoption of the Draft General Plan would also result in changes to the AIASP. Commenter notes the apparent lack of consideration of the AIASP as part of the project analyzed for the General Plan in the Draft EIR could be construed as segmentation. Both the Draft General Plan Update and the Draft EIR recognized the AIASP and the ALUCP as the guiding documents for the land use planning for the airport. No changes to the AIASP are proposed, and the Revised Draft General Plan Update does not result in a "footprint...much larger than...contemplated." The commenter's reference to "segmentation" is not relevant in this instance.

Response 106-11 P: Commenter notes that implementation in several General Plan Update sections is represented inconsistently. Commenter asserts that the lack of

3.0 COMMENTS AND RESPONSES TO COMMENTS

specific implementation information in the Draft General Plan does not provide the public with adequate information. The County appreciates the commenter's input on this issue and has included an implementation plan in the Revised General Plan Update. The reader may consult this section and the analysis of the Preferred Plan in this Final EIR to determine how the General Plan would be implemented and what the resulting impacts would be.

Response 106-12 E/P: Commenter suggests there is an inconsistency of designation for the Hess Vineyard property in regard to portions of the Draft EIR stating the area is to remain vineyard and other portions stating the area will have an industrial designation. Commenter further notes that designation of the Hess Vineyard property as industrial land use is inconsistent with the Draft GP's stated goal of agricultural preservation. The perceived inconsistency between the two sections of the Draft EIR can be easily explained. On pages 3.0-13 through -14, the description of both the Napa Pipe and Hess properties notes that both would retain their existing industrial designation as no change is proposed under Alternative A for these areas. Under Alternative C, however, which is described on page 3.0-24, the Hess Vineyard would be re-designated as Agriculture, Watershed and Open Space (AWOS) and would be required to continue use as a vineyard rather than allow for development with any industrial use. The Revised General Plan Update resembles Draft EIR Alternative C and suggests that the Hess Vineyard be re-designated as AWOS.

Response 106-13 P: Commenter suggests there is a lack of discussion in the Draft General Plan concerning the San Francisco Bay Conservation and Development Commission and areas of the County that are under the jurisdiction of the Commission. The County appreciates the commenter's input on this issue. However, discussion regarding BCDC and its jurisdictional role as it relates to Napa County can be found in both the Agricultural and Land Use Element and Recreation and Open Space Element. Please also see Section 4.0 in this Final EIR for an addition to the text of Section 3.0 (Project Description) of the Draft EIR regarding BCDC's jurisdiction.

Response 106-14 E/P: Commenter suggests the need to properly describe updates to the AIASP and the Housing Element, requiring a revision to the Draft EIR project description. As noted in Response 106-10 E/P above, no changes to the AIA Specific Plan are proposed. Also, the current Housing Element is incorporated by reference into the Revised General Plan Update and no changes are necessary until such time as a new Housing Element is prepared. The Draft EIR project description does not require modification.

Response 106-15 E/P: Commenter notes the discussion in the Air Quality Section of the Draft EIR regarding climate changes and suggests that it should also note the requirement that the California Air Resources Board (CARB) formulate carbon dioxide standards by January 1, 1980. The commenter's reference to the year 1980 is in error, and the analysis and description of AB-32 presented in the Draft EIR derived from the most recent information from the CARB as of February 2007 (the publication date of the Draft EIR). Additional information regarding climate change is included in Climate Change Master Response 3.4.4 and a new section in the Conservation

3.0 COMMENTS AND RESPONSES TO COMMENTS

Element entitled Climate Protection and Sustainable Practices for Environmental Health.

Response 106-16 E/P: Commenter reiterates the commenter's previous assertion that the Draft EIR and the Draft General Plan should be revised to address the relationship of the Draft General Plan to the existing Housing Element and the AIA SP. Commenter is referred to responses above. No changes to the AIA Specific Plan or the Housing Element are proposed, no related changes to the project description in the Draft EIR are required, and thus no other sections of the Draft EIR require revision.

Letter 107

From: ZQuat@aol.com [mailto:ZQuat@aol.com]
Sent: Monday, June 18, 2007 4:32 PM
To: Lowe, Rone Patrick
Subject: GP Revisions/ Cultural Resources

Dear Mr. Lowe

These following comments are for you and the Special Committee formed for the Revisions.

As an owner of historic property in Napa County I have special interest in the Cultural and Historic Resources Policies delineated in your draft of 16 February 2007.

The incentives for preservation which you have put forth are of utmost importance to the salvation, preservation and public enjoyment of several important, yet 'orphan' resources throughout the County

I am very hopeful that the recommendations for such incentives can be broadened, strengthened and incorporated into the new Napa County General Plan.

Thank You,
David Ehrenberger MD
601 Fairfield Lane

DavidEhrenberger@Centura.Org

107-1P

See what's free at AOL.com.

3.0 COMMENTS AND RESPONSES TO COMMENTS

LETTER 107: DAVID EHRENBERGER, MD, JUNE 18, 2007

Response 107-1 P: Commenter expresses a special interest in the cultural and historic resources policies included in the Community Character Element of the Draft General Plan. Commenter requests the incentives for preservation of historic resources be broadened, strengthened, and incorporated into the General Plan Update. The County appreciates the commenter's input on this issue. The County has considered this suggestion in the revisions to both the Community Character and Ag/LU Elements.

Letter 108

From: Silvertipnapa@aol.com [mailto:Silvertipnapa@aol.com]
Sent: Sunday, June 17, 2007 8:51 PM
To: Lowe, Rone Patrick; Lowe, Rone Patrick
Subject: County Greneral Plan Revisions

17June 2007

Re: Napa County Greneral Plan Revisions

Revision Committee
Napa County Planning Commission
Napa County Board of Supervisors

Patrick Lowe Deputy Director, Napa County Planning Department
1195 3rd Street, Ste.210
Napa, CA 94559
rlowe@co.napa.ca.us

Dear Mr. Lowe, Committee, Commission and Board,

I am sure that the Committee certainly knows as well as I that Historic Preservation has very broad support in our County and constitutes a strong attraction for our many visitors from near and far. In even less than authentic forms, Structures and Sites that relate to the past have great market appeal. Disneyland and Las Vegas owe some portion of their great popularity to this attraction and closer to home we have recent examples of Darriousch and Villa Amorosa underscoring this public fascination and interest.

108-1P

Our County is fortunate to have an abundance of real history... however a major portion of it is not broadly known and more importantly, not preserved. With strong incentives (and certainly less disincentives) we have a great opportunity to add to the cornucopia of attractive and meaningful Napa County features.

I would encourage you to broaden the zoning amendments recommended in your Cultural Resource Policy CC 25.1 to:

1. Allow some flexibility in 'historic use' (i.e. related, compatible and complimentary uses as at Greystone / CIA),
2. Provide for the restoration and reuse of buildings which have 'lost their integrity'those may take special encouragement and incentives) and
3. Create the possibility of reasonable expansion of use intensity if needed for long term preservation.

Respectfully,

William Moore, Architect
18 Peninsula Ct.
Napa CA 94559

billiz9@sbc.com

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LETTER 108: WILLIAM MOORE, JUNE 17, 2007

Response 108-1 P: Commenter notes that much of the County's historical resources are not broadly known and not preserved. Commenter requests that the County broaden the zoning amendments recommended in Cultural Resource Policy CC-25.1 [sic] in order to allow for flexibility, to provide for restoration and reuse of buildings that have lost their integrity, and to create the possibility of reasonable expansion of use if required for long-term preservation. The County appreciates the commenter's input on this issue and has revised related policies and action items in the Community Character Element to allow greater flexibility in terms of use. However County staff believes that incentives should only be available to legitimate historic resources which retain their historic integrity; otherwise owners could argue that the presence of one historic cornerstone or one historic rafter entitles them to consideration.

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Letter 109

DATE: June 4, 2007
 TO: Patrick Lowe, Napa County Deputy Planning Director
 FROM: Tom Gamble
 RE: Initial General Plan Comments and Recommendations

**SELECTED SIGNIFICANT AND UNAVOIDABLE IMPACTS OF THE DRAFT
 GENERAL PLAN (Page 7.0-5 and onwards of the DGP DEIR)**

Impact	Description
Impact 4.1.2	Implementation of the proposed General Plan Update would result in the loss of agricultural lands as designated on the current Napa County General Plan Land Use Map
Impact 4.1.4	Implementation of the proposed General Plan could result in a conflict with existing agricultural zoning or Williamson Act contracts.
Impact 4.3.1	Implementation of the proposed General Plan Update could result in substantial growth of population, housing, or employment under the three alternatives that could be in excess of regional projections or the one percent per year housing unit standard set forth in the Napa County Housing Allocation Program.
Impact 4.3.2	Implementation of the proposed General Plan Update could alter the ratio or “balance” between housing and employment in the unincorporated areas, substantially increasing the commutes in or out of the county.
Impact 4.4.1	Land uses and growth under the proposed General Plan Update could cause an increase in traffic, which is substantial in relation to the existing traffic load and capacity of the street system , within the County and adjacent jurisdictions, and could affect emergency access.
Impact 4.11.5	Continued land uses and development under the proposed General Plan Update would increase demand on groundwater supplies , and the associated increased well pumping could therefore result in the decline of groundwater level and accelerated overdraft.
Impact 4.13.3.1	Land uses and development under the proposed General Plan Update would increase the demand for additional sources of potable and irrigation water as well as additional or expanded treatment facilities to meet projected demands at year 2030 and at year 2050.

109-1E/P

The vision of agriculture as the highest and best use of the county’s unincorporated lands and of concentrating urban uses in the incorporated cities and urban areas has served our county well over the last few decades, and I support the continuation of those primary planning principles, as proposed herein for amendment.

Unfortunately, the DEIR alternative scenarios and the growth variables used in those alternatives demonstrate that the vision, goals and policies of the DGP will be adversely

3.0 COMMENTS AND RESPONSES TO COMMENTS

and irreversibly impacted with the consequences felt for this and every subsequent generation.

109-1E/P
cont'd

Given these negative impacts on both Napa's primary economy, and quality of life for all residents whether they be in the county or cities, significant changes to the DGP and the resulting DEIR are necessary and the following comments make initial recommendations.

DEIR DOES NOT BRACKET GROWTH ASSESSMENTS
Projections of Employment, Population, and Household Growth In the Unincorporated County 2005-2030 (EIR Table 4.3-12, Table VII-2)

Alternative	ALT A (Existing Plan #s same as no project)	ALT B	ALT C	ALT D	ALT E	ABAG 2005 Projections Table 4.3-12	Delta ABAG To ALT D (lowest pop. Growth)
Total Job Growth	10,832	11,053	8,603	9,713	14,376	4,440	120.75%
Total Growth of Residential Units	2,235	3,885	7,635	1,951	6,535	890	119%
Total Population Growth	5,013	9,029	18,063	4,390	15,075	2,500	75.6%
2050 Napa County/Citys Population Current 134,444	211,000 #from St.Dept of Finance provided by N.Cnty. number approximate. Not adjusted for each scenario.)	211,000	211,000	211,000	211,000	211,000	57% (min change from current population)

109-2E/P

As described to the GP committee, the DEIR alternatives were supposed to bracket the DGP with growth alternatives. The bracketing does not occur. The variable growth projections used, all skew in favor of growth with no alternative assessing the impacts of either using minimum growth projections as defined by ABAG 2005 (or 2007) numbers or a no-growth as a baseline. The argument that such numbers are unreasonably low lacks merit. The purpose of this DEIR study is to compare the impacts of growth with a baseline of no growth or the lowest possible growth to achieve true bracketing. Once truly bracketed, then elected leaders can make an informed decision, and the public will have objective assessments from which to gauge the actions of their elected officials.

Nor is it impractical that lower growth rates can be achieved in the unincorporated areas without violating state housing mandates. Of course it will take leadership, cooperation with cities, and perhaps political discomfort but much less than endured by those who first voted for the Ag Preserve. One model to review for reducing unincorporated housing mandates is Solano County which has reduced its growth in unincorporated areas. For reducing its growth, Solano County cities pay Solano County to offset the

3.0 COMMENTS AND RESPONSES TO COMMENTS

impacts to the County treasury. In Napa, the reverse is true, an unsustainable model of County paying cities to take its housing obligations.

109-2E/P
cont'd

RECOMMENDATION:

Provide DEIR Scenario wherein the growth variables used eliminate the significant and unavoidable impacts listed in the current DEIR. Or use no-growth or ABAG 2005 projections as additional alternative DEIR.

AGRICULTURAL PRESERVATION AND LAND USE ELEMENT

REVISIONS TO AGRICULTURAL PRESERVATION AND LAND USE GOALS

<i>Current General Plan</i>	<i>Proposed General Plan</i>	<i>Suggested Revisions</i>
#1. To Plan for agriculture and related activities as the primary land uses in Napa County and concentrate urban uses in the county's existing cities and urban areas.	#1. Preserve existing agricultural land uses.	#1. To Plan for agriculture and related activities as the primary land uses in Napa County and concentrate urban uses in the county's existing cities and urban areas.
#2 To develop and implement a set of planning policies which combine to define a population size, rate of population growth and the geographic distribution of that population in such a manner that the desired quality of life is achieved.	#2 Support the economic viability of agriculture, including grape growing, winemaking, other types of agriculture, and supporting industries to ensure the preservation of agricultural lands.	#2 To develop and implement a set of planning policies which combine to define a population size, rate of population growth and the geographic distribution of that population in such a manner that the desired quality of life is achieved.
#3 To determine what the land is best suited for, to match mans activities to the lands natural suitability; to take advantage of natural capabilities and minimize conflict with the natural environment	#3 Concentrate non agricultural land uses in existing urbanized or developed areas.	#3 Support the economic viability of agriculture, including grape growing, winemaking, other types of agriculture, and supporting industries to ensure the preservation of agricultural lands.
#4 To work with cities, other governmental units, and the private sector to plan for services, facilities and accommodations, including housing, transportation, economic development, parks and recreation, open space, and other total county needs.	#4 Provide for commercial, industrial, residential, recreational, open space and public land uses in locations that are compatible with adjacent uses.	#4 To work with cities, other governmental units, and the private sector to plan and provide for commercial, industrial, residential, recreational, open space and public land uses in locations that are compatible with adjacent uses.

109-3P

3.0 COMMENTS AND RESPONSES TO COMMENTS

<p>#5 To implement the General Plan in every possible way to A) Ensure the long term protection and integrity of those areas identified in the general plan as agricultural, open space, and other county needs. B) Stimulate the development of those areas identified in the general plan for residential, commercial, and industrial.</p>	<p>#5 Create a stable and predictable regulatory environment that encourages investment by the private sector and balances the rights of individuals with those of the community.</p>	<p>#5 Create a stable and predictable regulatory environment that encourages investment by the private sector and balances the rights of individuals with those of the community.</p>
<p>NONE</p>	<p>#6 Plan for demographic changes and desired social services when siting public facilities and when considering the design of those facilities.</p>	<p>#6 Plan for demographic changes and desired social services when siting public facilities and when considering the design of those facilities.</p>

109-3P
cont'd

Additional New Land Use Policies to better manage growth impacts

LU ___ - The County shall prioritize its lobbying efforts to exempt itself from state housing mandates which conflict with the state's recognition of Napa County as a significant and unique agricultural resource.

LU ___ - In conjunction with; and to successfully forward its state lobbying efforts to a be exempted from state housing mandates, the County shall prioritize its cooperative efforts with the cities located within Napa County where through such efforts, the County will significantly or even eliminate its housing allocation numbers as has been accomplished by other unincorporated areas in California.

LU ___ - The Napa County Board of Supervisors shall endorse the removal of the sunset provision of Ms. J.

LU ___ - The Napa County Board of Supervisor shall prioritize its efforts and work to eliminate all so called urban bubbles in keeping with its overarching policy of promoting growth within existing incorporated urban areas.

Policy Deletions to better manage growth impacts:

LU 120: Overrides the 1% growth management plan.

LU 85: 1. Encourages growth outside of existing urban areas. 2. Creates another formal governmental and divisive political layer. 3. Redundant. Private organization exists now to present viewpoints. 4. Not socially equitable. Provides added representation in some geographic areas and not others.

3.0 COMMENTS AND RESPONSES TO COMMENTS

LU-97: 1. encourages growth outside of urban areas. 2. Favors specific landowner over all others. 3. No specifics providing an understanding for endorsement. 4. Staff generated idea. 4. Ms. J.vote Avenue currently available.

109-3P
cont'd

LU 93,99: 1. Zoning should conform to General Plan Designation. 2. Encourages growth outside of urban areas.

LU 98: 1.Creates opportunity for conflict with agricultural preservation.

CONFLICTING USES:

The many policies and goals of the DGP are all of equal weight and history demonstrates that a great deal of time and money is spent in unnecessary battles to protect agriculture and its natural resources from competing uses. Needed is a clear framework that gives precedence within the DGP to mitigating growth and other impacts upon agriculture and its resources when conflict arises with other goals and policies.

109-4P

RECCOMENDATION:

New Land Use Policy: When conflicts between Agriculture and other economic uses of land and resources arise, findings shall be made in favor of agriculture.

New Conservation Goal: To work with cities, other government units, and the private sector to reduce, recycle, and reuse natural resources including those originating in Napa County such as water.

New Conservation Policy: Second to growth management; the County shall prioritize its state lobbying efforts to have agricultural uses of groundwater have priority over other economic uses of groundwater.

New Conservation Policy: County shall work with cities, water districts, and sanitation districts to recycle water to drinking water standards and distribute such recycled waters for human consumption.

New Circulation Policy: Any transportation capacity increases shall not utilize lands capable of agricultural production. Capacity and safety improvements done to roadways shall include installation of safe and exclusive crossings for agricultural equipment.

“DEVELOPED AREAS”

The term “developed areas” as used throughout the DGP is vague and prone to unintended growth impacts outside of the DGP’s intent to see future development outside of desire to see to becoming “urban areas.”

109-5P

RECCOMENDATION

Eliminate use of the phrase.

3.0 COMMENTS AND RESPONSES TO COMMENTS

VIEWSHED

A list of freeway and highway expansions has been added to the DGP while the list of roads associated with viewshed has been removed. The viewshed is part of the watershed as well as contributing to the tourist economy. Does the DEIR make any calculation as to the impacts including economic impacts caused by the removal of the viewshed roads? The argument for removing the list was to simplify the DGP. That argument has no merit. The DGP is longer and more complex than previous. Removing the list coupled with adding a list of highway expansions is contradictory to and does not support the vision, goals, or policies of the DGP.

109-6E/P

RECCOMENDATION

Restore the viewshed list and let the elected officials decide if it should be in or out.

3.0 COMMENTS AND RESPONSES TO COMMENTS

LETTER 109: TOM GAMBLE, JUNE 4, 2007

Response 109-1 E/P: Commenter notes that the vision of agriculture as the highest and best use for the County has served the County in the past and should in the future. Commenter further notes that with growth and other variables mentioned in the Draft EIR, adoption of the General Plan Update will result in irreversible impacts and consequences. County staff appreciates the concerns regarding significant and unavoidable impacts and with the commenter's assistance has revised the General Plan Update to address some of the issues identified. Nonetheless, as a General Plan document that is required to look to the future, in this case to the year 2030, changes in the County would naturally result in some impacts that are significant and unavoidable. Please see the Alternatives Master Response 3.4.2 for more discussion.

Response 109-2 E/P: Commenter asserts that the growth assumptions utilized by the various alternatives analyzed in the Draft EIR do not bracket growth assessments. Commenter requests a scenario be provided wherein growth variables eliminate identified significant and unavoidable impacts listed in the current Draft EIR or use the no-growth or Association of Bay Area Governments (ABAG) 2005 projections as an additional alternative. Commenter is referred to Alternatives Master Response 3.4.2 regarding the selection of alternatives analyzed in the Draft EIR.

Response 109-3 P: Commenter provides new text for Ag/LU Goals 1-6 as well as four new AG/LU policies. Commenter also requests the deletion of Ag/LU policies 85, 92, 97, 98, 99, and 120. The County appreciates the commenter's input on this issue. The revised General Plan Update has deleted Ag/LU policies -85, -97, -98 and -120; however, -92 and -99 have been retained with modifications. Ag/LU Goals 1 through 6 have also been modified and a new Goal Ag/LU-7 has been added.

Response 109-4 P: Commenter notes that many policies and goals are of equal weight, creating conflict between agriculture and competing uses. Commenter provides one new Ag/LU policy as well as a new goal and four new policies for the Conservation Element. The County appreciates the commenter's input on this issue. New goals and policies have been added to both the Agricultural and Land Use and Conservation Elements. The Introduction also contains some new explanatory text under the sub-heading "Using and Interpreting this General Plan" (p. 4).

Response 109-5 P: Commenter recommends the deletion of the phrase "developed areas" throughout the proposed General Plan Update as it is vague and it is prone to unintended growth. The County appreciates the commenter's input on this issue and has replaced the term "developed areas" in most locations in the plan as appropriate.

Response 109-6 E/P: Commenter requests that the list of viewsheds previously included in the General Plan Update be reinserted in the proposed Update. Commenter cites the value of the viewshed as part of the watershed and as a contributor to tourism. Commenter asks if the Draft EIR includes discussion of the impacts related to the removal of viewshed roads. The Draft EIR

3.0 COMMENTS AND RESPONSES TO COMMENTS

included discussion of the value and potential impact to viewshed roads in the Visual Resources/Light and Glare Section of the Draft EIR (see Section 4.14). Impact 4.14.1 directly addressed impacts to visual resources in the County, including viewshed roads. Figure 4.14.1, also provided in the Draft EIR, included a depiction of the major viewsheds in the County and their respective percent viewed points (DEIR, page 4.14-3). A map of roads subject to the viewshed ordinance has also been added to the Revised General Plan Update (p. 133).

3.0 COMMENTS AND RESPONSES TO COMMENTS

Letter 110

June 16, 2007

Draft General Plan Comments from Tom Andrews:

To: Hillary Gitelman

Hillary, Great job in putting the Draft General Plan together, there has been positive and constructive effort from you and your staff throughout this extremely difficult process. Well done. I look forward to our final review of each element and keeping the Draft basically as is to send off to the Planning Commission and the Board of Supervisors for their approval.

Agricultural Preservation and Land Use Element

Policy Ag/LU-15. The County should allow any size parcel, no matter how small, to operate a winery, provided that 100% of the wine grapes are grown on that parcel and that parcel only. The winery must conform to all other requirements of the Winery Definition Ordinance, except the set back requirements from Hwy 29 or Silverado Trail; these parcels could be too small to meet that set-back. 110-1P

Policy AG/LU-28. Bullet Point #7. Allow second dwelling units In the AP Zoning , use the same requirements for the second dwelling units in the AWOS.

General Comment regarding Historic Buildings.

Historic Buildings are referenced in the Land use and Community Character Elements so I would like to add to where applicable: 110-2P

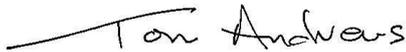
If the Owner of any Historic Building wishes to restore their building and the merits of the Tax Credit Benefit for the restoration by the Department of Interior Standards makes the project unfeasible they may use an Architect with Historic Restoration Experience. The Project would then be reviewed by Planning Staff to confirm that the restoration is following the basic intent of the Departments Standards. We need to have some flexibility to save more historic buildings.

Circulation Element

Policy CIR-3.6. If it becomes feasible in the future, allow a commuter rail system with the goal to connect Napa County with the Ferry Terminal in Vallejo. 110-3P

Community Character Element

See my General Comment above regarding Historic Building Restoration. 110-4P



Tom Andrews

cc: via email

3.0 COMMENTS AND RESPONSES TO COMMENTS

LETTER 110: TOM ANDREWS, JUNE 16, 2007

Response 110-1 P: Commenter states that any size parcel, no matter how small, should be able to operate a winery, and second dwellings should be allowed in AP zones. The commenter's statement associated with this issue is understood. See Action Item Ag/LU-16.1 regarding future consideration of amendments to the Zoning Ordinance defining "small wineries." Policy Ag/LU-30 includes a provision to allow production of second units in all areas of the unincorporated county as appropriate.

Response 110-2 P: Commenter requests that, if an owner of a historic building wishes to restore their building but the Tax Credit Benefit (Department of the Interior) makes the restoration infeasible, the owner may use an architect with "historic restoration experience" with review of the project by County Planning staff to ensure the restoration meets the "basic intent" of the Department of the Interior. The commenter's statement associated with this issue is understood. Policies and related action items in the Community Character element would not require the use of tax credits or review by the National Park Service, Department of the Interior. Policies do however support the use of the Secretary of the Interior's Standards, which are recognized by preservation architects and other professionals as providing for the appropriate treatment of historic resources.

Response 110-3 P: Commenter requests that a commuter rail system with the goal to connect Napa County with the Ferry Terminal in Vallejo be allowed under Policy CIR-2.6, if feasible. The County appreciates the commenter's input on this topic. While alternative modes of transportation are addressed by various policies in the Circulation Element, a commuter rail system to connect with the Vallejo Ferry Terminal is not explicitly addressed. Draft EIR Alternative E provides an analysis of impacts associated with expanded transit options.

Response 110-4 P: Commenter asks that his previous comment (110-2 P) be considered in the context of the Community Character Element as well. See Response 110-2 P above.

Letter 111

From: gbachich@sbcglobal.net [mailto:gbachich@sbcglobal.net]
Sent: Friday, June 01, 2007 10:56 AM
To: Gitelman, Hillary
Subject: General Plan comments

Hillary:

I would like to comment on the three "controversial" issues that you are considering forwarding directly to the Planning Commission without further steering committee review.

1. Napa Pipe property

I think the original impetus for converting this industrial land to multiple use, including high density residential, has evaporated. This idea was originally sold as a way to meet the ABAG housing mandates without converting agricultural land, and without having to bargain with the City of American Canyon to get it to accept part of our mandated share. However, the ABAG mandate has recently been reduced to 1/3 of what it was expected to be, eliminating the risk of having to convert agricultural land in order to comply, and eliminating the need to bargain with American Canyon over this issue.

The recent revelation that second units can be counted as part of the housing totals we can use to meet the ABAG mandate, together with the revelation that second units do not count toward our 114 unit annual Measure A cap, indicates that our Measure A allotment plus a few more second units scattered throughout the county will be more than adequate to meet ABAG mandates for several more decades.

Second units are a particularly attractive way to meet the ABAG mandate because they are small and therefore affordable to rent, they can be constructed with minimum impacts on the environment because roads and power lines to these sites are mostly already installed, and they can provide work force housing closer to upvalley work sites. We need only look at early morning traffic on northbound highway 29 north of Napa to see the need for upvalley housing.

Absent the compelling need for high density housing in the unincorporated area of the county to meet the ABAG mandate, I believe we should not plan for it. According to the Baseline Data Report, 12,157 acres of the unincorporated county area is designated residential, and 2,977 acres of that is vacant, including 648 acres in parcels under 2 acres, and 2,329 acres in parcels of 2 to 10 acres. Those numbers indicate there is plenty of room for enough low density, low impact housing in the ag/watershed areas and in the urban bubbles to meet our needs.

It would be a mistake to convert the Napa Pipe property to other uses. This land is well suited for industrial use, has a long history of industrial use, and we will one day need it for industrial use. This land is ill-suited for high density residential use due to its flooding potential, the airport traffic pattern, the railroad running through the middle of it, and the existing industrial uses already surrounding it.

If the County does, for some reason unfathomable to me, determine that this land should be used for high density residential, then I think the County should encourage LAFCOM and the City of Napa to arrange to annex it and develop it within the City, which can more readily provide the services essential to high density residential development. It should not be converted to high density residential under County management.

I think you will find at least a 2/3 majority of steering committee members in agreement with this analysis, and therefore I do not think there is any basis for forwarding it directly to the Planning Commission without a steering committee recommendation.

111-1E/P

3.0 COMMENTS AND RESPONSES TO COMMENTS

I think the BOCA/Pacific Coast property should be considered separately, as it is not quite as clear to me how it should be handled. It lies under the primary approach to the Napa County Airport. It has a history of industrial use, and we might need it again for industrial use some day. However, being at higher elevation on the east side of Soscol, it apparently does not have flooding potential. It also does not have a railroad running through the middle of it, it is not surrounded by other industrial uses, and it does not seem as suitable for industrial use as the Napa Pipe property. Its location and views might make it attractive for residential development.

111-1E/P
cont'd

However, if it is to be converted to high density residential, it should first be annexed into the City of Napa. It should not be developed for high density residential use under County management. I think you might find the steering committee largely in agreement on this point, as well.

2. Angwin

The "anti-development" folks in Angwin are trying to get us to amend the general plan to preempt Pacific Union College's plan to develop its property. They point to particulars of PUC's plan that would increase traffic, or change neighborhood character as reasons for us to eliminate the urban bubble or to shrink it in particular ways that would make PUC's plan impossible to implement.

111-2P

I urge the steering committee not to permit the general plan update process to be used in this way. Regardless of the merits of PUC's plan, I feel it is inappropriate to use the general plan update process as a forum to review any particular project. The proper forum for this will be at the Planning Commission, once a formal development application has been submitted. The impacts of PUC's plan, whatever it turns out to be, should be reviewed in the usual public forum, and the decision on whether to approve, amend, or deny should be made in the usual way, not through an end run around the process by a pre-emptive amendment to the General Plan.

Opponents claim that the Angwin Urban Bubble was an accident, that someone carelessly drew a circle on a map, intending to include just the already developed areas. However, I feel this is very unlikely. These bubbles were drawn by the people who were restricting development rights on nearly the entire county. It would have been unreasonable for them to prohibit development everywhere, so naturally they made decisions about where development would be appropriate, and circled those areas, which include only a tiny percentage of the county area. For us to eliminate or significantly shrink those already tiny bubbles now would be to return to the unreasonable position of prohibiting development everywhere. In addition, it would be unfair to PUC to allow a vocal minority to persuade us to rob PUC of development potential that has existed for as long as the Ag Preserve, and which PUC has every right to expect will endure. I urge the steering committee not to shrink or eliminate the Angwin urban bubble.

I would like to see the bubble expanded to include the already developed urban areas that now lie outside the bubble. I think the steering committee should recommend that a Measure J vote be arranged to accomplish this.

3. American Canyon

The City of American Canyon wants to expand its ULL, and eventually its city limits, to Fagan Creek, which runs through and under the Napa County Airport. This move is apparently an effort to gain control of the industrial land along the southern edge of the Napa County Airport, including the tax and fee revenues generated by those properties. I see no reason for

111-3E/P

Napa County to give up control of these properties, and I urge the steering committee to recommend the RUL for American Canyon remain where currently shown in the draft Napa County General Plan.

The City of American Canyon is currently holding property owners in the American Canyon County Water District (even those outside the proposed ULL expansion) hostage in its effort to force Napa County to go along with its proposed expansion. The American Canyon County Water District was formed over 30 years ago by property owners in the district who voted to tax themselves to fund the district and to bring water to their properties. The water was obtained, the distribution mains were installed, and water laterals and meter boxes were installed on the properties. They have paid special tax assessments for the last 30 years, presumably to retire the bonds issued to finance those improvements. They have every right to expect to be able to use that water.

However, now that the City of American Canyon has taken control of the American Canyon County Water District, it is denying new water service to those parcels, saying the water is needed for properties within the City limits. They say this problem could be resolved if the County will approve moving the ULL north to Fagan Creek. This is blackmail, pure and simple, and the American Canyon County Water District rural property owners are unwilling pawns in this dirty political fight. Not only should this behavior not be rewarded, it should be discouraged in the strongest terms.

This issue will undoubtedly be settled by the Board of Supervisors based on political pressures and considerations beyond the reach of the steering committee. However, I urge the committee to recommend that the planning commission and the BOS "just say no" to American Canyon expansion, and to American Canyon blackmail.

George Bachich

111-3E/P
cont'd

3.0 COMMENTS AND RESPONSES TO COMMENTS

LETTER 111: GEORGE BACHICH, JUNE 1, 2007

Response 111-1 E/P: Commenter requests that the Napa Pipe property not be converted to uses other than industrial as the need for additional affordable housing can be met by other properties in the vicinity and the site's specific characteristics make it attractive as an industrial site. Furthermore, the commenter asks that the Napa Pipe and/or the BOCA/Pacific Coast property be annexed to the City of Napa prior to conversion to high-density residential use in order to provide adequate services. Commenter asks that these issues be brought before the Steering Committee prior to being heard before the Planning Commission. County staff appreciates the concern for keeping the Napa Pipe site as industrial and did bring this issue to the Steering Committee for discussion prior to its consideration by the Planning Commission. The Revised General Plan Update designates the Napa Pipe site and the Boca/Pacific Coast site with a Study Area designation, requiring further study before consideration of land use changes to allow other than industrial uses.

Response 111-2 P: Commenter requests the Angwin urban bubble be expanded to include developed areas outside the bubble shown in the proposed General Plan Update as well as to encompass an area that would allow PUC's development plans to go forward. Commenter notes this would require a Measure J vote. The proposed General Plan Update has been revised and now removes areas currently zoned for agricultural use from the Angwin bubble and identifies existing rural residential areas for inclusion in the bubble (subject to Measure J vote).

Response 111-3 E/P: Commenter requests that the County not allow the City of American Canyon to expand to Fagan Creek. Commenter cites issues with the American Canyon Water District and service to properties in the Water District. The proposed General Plan Update has been revised and now proposes an RUL for the City of American Canyon that reflects the current status of negotiations between the City and the County. This RUL would allow the City to expand part of the way to Fagan Creek as long as citizens adopted a growth boundary that cannot be changed except with a vote of the people.

Letter 112

From: Gopal Shanker [mailto:gopal@recolteenergy.com]
Sent: Monday, June 18, 2007 4:20 PM
To: Gitelman, Hillary
Subject: Comment on General Plan

Dear Ms. Gitelman:

I am requesting that Napa County's General Plan either have energy as a separate topic area or that each of the topic areas' energy impacts be estimated, with the ultimate objective of making Napa County "fossil-fuel free" in five years. This means producing enough clean energy (or energy from renewable resources such as solar, wind, small-scale hydro, geothermal, and biomass, and waste gases) first to offset 100% of our own energy requirements, and second, for export.

112-1P

This is an achievable, yet bold, goal. Many other regions have taken tentative measures to promote renewable energy, but none have taken the action being proposed here.

The benefits of Napa County becoming a net producer of clean energy are that it can:

- 1) establish a precedent in the U.S. for others to follow
- 2) make the transition from non-renewable to renewable resources early and relatively painlessly
- 3) strengthen its agricultural industry and attract clean energy businesses
- 4) develop into an eco-tourism and eco-restoration destination
- 5) mitigate the impacts of continued fossil fuel use, including climate change, peak oil, and other environmental and social issues
- 6) generate tremendous amounts of wealth

The Case for Renewable Energy

There are many reasons to shift from using fossil-fuel based sources of energy to clean energies.

1. demand – U.S. demand for energy continues unabated, while the developing economies of nations like India and China, where more than a billion people are emerging from poverty, and are competing for the same global resources
2. supply – the maximum amount of petroleum that can be extracted from oil wells is expected to occur within our lifetimes.

112-2E/P

Just these two factors acting together are putting an upward pressure on the cost of fossil fuels

3. climate change – emissions from the burning of fossil fuels is affecting global climate

The issue of whether or not one believes that climate change is real or caused by humans becomes irrelevant, because governments, including California through AB32, are imposing measures to regulate (tax?) greenhouse gas (GHG) emissions. These regulations will make fossil fuel use more expensive.

4. health – air quality is affected by the extraction and use of fossil fuels
5. agriculture – U.S. agriculture is highly dependent on petroleum-based fertilizer (over) use, which causes water and ecological pollution
6. water – More than 50% of the water used in the U.S. is used to produce energy from fossil fuels and 20% of the energy used in the state of California is used to move water.
7. Security – current sources of petroleum are concentrated in a few politically unstable parts of the world and the economic and human costs of securing these resources are high. Moreover, generation

3.0 COMMENTS AND RESPONSES TO COMMENTS

from multiple, rather than single sources, will make our energy supplies more secure against security threats and, for electricity generation, grid failures.

8. Wealth Creation – There will be a tremendous amount of wealth created / redistributed as the world makes the shift from its current fossil fuel base.

Because fossil fuel energy has been so integrated into our lives, the problems associated with fossil fuel use have been considered piecemeal and the solutions to deal with these problems have been myopic and even more problematic. We still do not include the true costs of producing and using fossil fuels in the cost of energy.

Items 1 through 7 listed above are *converging*, and are resulting in the costs of fossil fuels increasing and the costs of *using* fossil fuels also increasing. We are finally recognizing that the problem is continued use of fossil fuels and that the *only* viable alternative is clean energy. Because these events are converging, they are compressing the time we have available to find and adopt clean energy solutions.

It would be a tremendous accomplishment for Napa County to become independent of fossil fuels in five years and demonstrate that we and others can make the transition from the dying fossil fuel era to the emerging era based on clean sources of energy.

The Dangers of Inaction

Napa County is currently dependent on two industries: wine and tourism.

Napa wineries, which depend in part on the local microclimate for their success, are vulnerable to climate change. If the growing conditions in the Napa Valley change substantially, Napa may not be able to maintain its position as a producer of premium wines.

Napa's wine and tourism based economies may also find it difficult to thrive if the cost of energy increases dramatically. Costs of production will increase and commuters and tourists may not be able to afford travel into the County.

Not planning now on *how* to meet the County's future energy needs will limit our options when we do need to act.

My (unverified) calculations show that Napa County's emissions based on 2003 baseline electricity, natural gas, and petroleum usage is 1,147,717 tons of carbon dioxide. At "tax" estimates of \$4 and \$40 per ton of carbon dioxide, Napa County's annual "exposure" ranges between \$4.6 million and \$46 million, or between \$35 and \$350 per capita.

Clearly Napa County will benefit from a solution that mitigates the risk of doing business here, that brings in higher paying jobs, that enables more people who work here to also live here, that improves the environment and people's lives, and that preserves Napa County's agricultural heritage.

There is no reason not to act. Napa County has already developed innovative and replicable solutions

Becoming an Agricultural Preserve in 1968.

Producing world class wines. Stag's Leap Wine Cellars and Chateau Montelena won the 1976 Paris Tasting competition. The *people* of these and other Napa wineries demonstrated that they had the vision, skills, and determination to develop a world class industry within a few short years. The example they set has inspired people from many regions that traditionally have not produced wine to develop their own wine industries.

Establishing the New Technology High School (NTHS). This school is one of four models nationwide that The Gates Foundation chose and funded in 2000 for replication. The New Technology Foundation has established 28 schools in the U.S. based on the NTHS model. There will be 35 by year end 2007.

112-2E/P
cont'd

112-3E/P

112-4P

Preserving land in Napa County. The Land Trust of Napa County has preserved 25,000 acres of land by negotiating conservation easements with willing landowners.

Restoring a five-mile stretch of the Napa River. In 2002, the Rutherford Dust Society (RDS) initiated a plan to manage and restore a four-mile reach of the Napa River. The group intend to extend the project up the tributaries to include the entire watershed.

Establishing a living river. The Napa River Flood Management Plan was developed by an unprecedented countywide coalition of political and community leaders, private industry, natural resource agencies, non-profit groups, and private citizens. The plan provides flood protection by reconnecting the Napa River to its historical floodplain and restoring over 600 acres of tidal wetlands. The County is paying for the plan through a dedicated sales tax. For this accomplishment, Napa was recognized in a report to Congress for showing “the courage to break with convention” ... and ... inspiring “new thinking in other communities, and within government agencies.”

Many people in and beyond the county have benefited from these and other solutions developed in Napa County. There will be generations of new beneficiaries when this proposal is implemented.

Getting Started

Achieving the objective of producing more than 100% of our energy from renewable resources requires a multi-pronged strategy, including: benchmarking current energy consumption and production, estimating future energy requirements, gathering resources and partners, implementing energy conservation and efficiency strategies, generating electricity from renewable resources, and restructuring our community to be based on renewable, rather than non-renewable, resources.

To be successful, the transition has to involve both both top-down and bottom-up actions. Many actions are being taken and developed by various individuals and groups in the county.

Napa County’s General Plan should actively support the implementation of these actions that promote these renewable energy initiatives as they are proposed.

The consequences of successful adoption and implementation of this plan will be a release of creativity, and increased prosperity for our county, our neighbors, California, and the rest of the world.

Thank you.

Sincerely,

Gopal Shanker
President
3901 Lake County Highway
Calistoga, CA 94515
Phone: (707) 480-1960
Fax: (866) 561-9002
Email: gopal@recolteenergy.com

112-4P
Cont'd.

112-5P

3.0 COMMENTS AND RESPONSES TO COMMENTS

LETTER 112: GOPAL SHANKAR, RECOLTE ENERGY, JUNE 18, 2007

Response 112-1 P: Commenter requests that Energy be a separate topic area or each of the topic areas energy impacts be estimated. Commenter asks that the County adopt the objective of making the County "fossil-fuel free" in five years. Previous Goal CON-14 has now been incorporated into a heading titled Climate Protection and Sustainable Practices for Environmental Health, with Goal CON-14 dedicated specifically to policies related to energy. County staff has declined to adopt a goal of being "fossil-fuel free" in five years due to concerns about the infeasibility of such a goal and impacts that could be associated with alternative energy generation on a large scale.

Response 112-2 E/P: Commenter provides an argument for the use of renewable energy, including benefits in the area of energy demand, supply, climate change, health, agriculture, water, security, and the creation of wealth. Policies related to the pursuit of alternative/renewable energy sources have been included under "Energy Goals" in the proposed General Plan Update (Policies CON-55 to -62). These policies would serve to further reduce the county's dependence on non-renewable energy sources and the production of greenhouse gas emissions (GHGs). In regard to climate change, commenter is referred to Climate Change Master Response 3.4.4.

Response 112-3 E/P: Commenter notes the effect energy issues and climate change would have on wine production and tourism in the County. Additional policies have been incorporated related to sustainable practices, including more specific policies to calculate emissions inventories to track reductions. Commenter is referred to Climate Change Master Response 3.4.4 for information regarding the effects of climate change. Also see policies in the Economic Development Element regarding employment and economic diversity.

Response 112-4 P: Commenter notes that Napa County has already developed innovative and replicable solutions, including the production of world class wines, the establishment of the New Technology High School, preservation of land in Napa County, restoring a portion of the Napa River, and the establishment of the Napa River Flood Management Plan. County staff appreciates the information.

Response 112-5 P: Commenter states that the General Plan Update should actively support the implementation of those actions that promote renewable energy initiatives as they are proposed. See Response 112-1 P above. Policies have been incorporated into the revised General Plan Update to support intergovernmental cooperation for renewable energy and GHG emissions reduction efforts.

Letter 113

Patrick Lowe
Deputy Planning Director
Napa County Planning
1195 Third St. Suite 210
Napa, CA 94559

June 17, 2007

Re: Draft General Plan and Draft EIR Comments

From: Harold R. Kelly
3450 Meadowbrook Dr. Napa, CA 94558 (707)255-7042

As a former Napa County Planning Commission Member, Local Agency Formation Commission Member, and City of Napa Councilman, I have had considerable experience with the intent and public perception of long term planning in Napa County.

113-1P

The 1983 General Plan has served Napa County well over the last 25 years. The intent of the Current Board of Supervisors was to make the General Plan more readable, updating it to reflect today's reality while maintaining the existing goals and long term direction of the 1983 plan. The current draft created by staff and the General Plan Steering Committee has gone far beyond those goals.

The Draft General Plan document is far more permissive than the current plan, changing goals by the use of weasel words such as "should", not shall, "could", not will, "may", not must, etc. These words make it a mushy document that can be interpreted by future developers and lawyers to mean what they want, not what the public expects from this General Plan update.

The Draft General Plan is very far from the slow, managed, city centered growth we have today and which is supported by many public votes over the last 25 years. This document fails to acknowledge that with the protection of agriculture, that the cities are providing the housing and urban services needed by county workers and have been doing it well and that housing needs are not solely borne by the county unincorporated areas, nor do they need to be, by changing planning directions as outlined in this draft document. We can and must continue to direct our own growth into existing developed county urban areas and the cities of the county. The County needs to develop policies for sharing the needed local workforce housing needs with the cities where urban services already exist.

113-2P

The plan does not identify clearly who our workforce is, what their housing needs are, and does not project "smart growth policies" that will bring the county the kind of growth in jobs and housing that will benefit existing workers. Transportation needs are not coordinated with this kind of planning.

113-3P

Doing what we and other communities have always done, by building more highways for single passenger automobiles only encourages commuting. Local workforce housing can be planned for the needs of existing workers, and new employment sources can be required to provide housing if not available within the county or cities of the county.

3.0 COMMENTS AND RESPONSES TO COMMENTS

Affordable workforce housing should be constructed by the county directly or by the businesses that use the workforce, rather than depending on 15-20% largess by developers who have other goals. Specific language in the General Plan can and will create the specific requirements for housing developments without getting housing and commercial development you do not want.

113-3P
cont'd

Smart Growth policies will very clearly define the amount and location of growth where you want it and will clearly spell out where you do not want it. Place future residential growth where transportation and urban services already exist. Use infill policies and required annexation policies, and limited water and sanitation policies in cooperation with the existing cities and districts of the county. Limit the expansion of existing urban areas that affect agriculture and watersheds. Work to develop county policies that coordinate with city and district policies. The taxpayers and voters of the county also belong to the cities and districts. Direct LAFCO to be more aggressive in supporting these kind of smart growth policies. The General Plan can and must be proactive, in developing the future of Napa County.

113-4P

Specific Suggestions:

1. Page 14 & 15, the use of "already developed areas" is too broad and must be changed to "existing incorporated areas and already urban or urbanized areas". Every road in the county creates a developed area. Concentrate future development in existing urban areas and incorporated cities.

113-5P

2. Page 18, housing strategies must be limited to Napa County's Workforce at all levels. We cannot become the housing supplier for the bay area, or the workforce-housing supplier for others.

113-6P

3. Page 33, the preservation of existing agriculture must include the preservation of agricultural watersheds and open space (AWOS). Existing agriculture will not continue to exist if the watershed lands are not protected. The parcel splitting of agricultural and watershed lands must be strongly opposed as this will lead to the destruction of the watershed, and open space protective lands which are required to preserve the existing agriculture.

113-7P

4. Page 43, the agricultural Hess Vineyard reservation for Industrial is improper, if the county plan is removing existing Industrial uses by their change to Transitional. There has not been a study to determine the need for and the best uses of existing Industrial lands. The county must conserve all agricultural lands.

113-8P

5. Page 47, the use of transitional lands for existing industrial lands must not be so identified. Use a specific plan approach for any change of any existing industrial lands with complete studies to identify future industrial needs, prior to permitting changes in the General Plan. Coordinate county industrial lands with transportation changes, and workforce housing needs, into a specific plan desired by the county and the cities, not what might be suggested by a developer. If the county does not determine what it wants, it will not get it and opportunity for long term planning will be lost.

113-9P

3.0 COMMENTS AND RESPONSES TO COMMENTS

6. Page 49, the geographical areas referred to as urban bubbles must be eliminated and the urban areas clearly defined and limited to actual zoned non-agricultural urban areas. The use of undefined bubble planning is inappropriate. | 113-10P

7. Page 86, the property rights provisions in all sections of the General Plan document have no reason for consideration, as they are not land use provisions that can be enforced outside of existing state law. | 113-11P

8. Page 93, the interagency cooperation must be strengthened. The existing land use goal #4 in the 1983 General Plan is acceptable. The goals must clearly state that the county will cooperate with the cities on all issues that affect the cities and special districts, such as housing, transportation, water, sanitation, communications and safety. | 113-12P

9. Page 106, the policy provides an exception to the General Plan, which will weaken the Growth Management System and the urban/city growth provisions. Any exceptions must be only used to help the county meet state mandated affordable workforce housing with strict requirements as to when the exception can be used and that it must meet all of the requirements set forth in a very strong policy. Any exceptions to a very strong policy will undermine the General Plan Growth Management System. | 113-13P

10. Page 232, the Recreation and Open Space Element deals with recreation with references to open space, but the section does not clearly spell out the real need of open space as clearly set out in state law on pages 7-8 in the draft document. Although mentioned in other elements, I believe that all four of the reasons spelled out in government code 65560 must be restated in this section to clearly identify the strong reasons for the protection of open space: 1. the preservation of natural resources, 2. the managed production of resources including forestlands, rangelands, and agricultural lands, with the recharge of groundwater supplies, 3. the use for outdoor recreation, and 4. the use for public health and safety. Although important for recreation, the protection of agriculture and water supplies in Napa County is paramount and must be so stated. | 113-14P

Thank you for your consideration of my remarks.

Harold R. Kelly

3.0 COMMENTS AND RESPONSES TO COMMENTS

LETTER 113: HAROLD KELLY, JUNE 17, 2007

Response 113-1 P: Commenter notes the proposed General Plan Update is far more permissive than the 1983 Plan, particularly with respect to language such as "should" instead of "shall." The commenter's statement associated with this issue is understood. Many instances where the proposed General Plan Update has used the term "should" have been changed to "shall." Please consult the Revised Draft General Plan Update for specifics.

Response 113-2 P: Commenter asserts the proposed General Plan Update is different from the current focus on city-centered growth. Commenter states that growth must be directed into existing developed urban areas. The commenter's statement associated with this issue is understood. The Revised General Plan Update directs growth into the existing cities and designated urban areas of the County and would conform with the County's 1% growth limit.

Response 113-3 P: Commenter notes that the proposed General Plan Update does not identify clearly who the workforce is and what housing needs are. Commenter further asserts that the proposed General Plan Update does not project "smart growth" principles. The County appreciates the commenter's input on this topic. The Revised General Plan Update includes an Action Item (Ag/LU-3.2) to better define the term "workforce housing" and adopt a local workforce housing ordinance. It also contains many policies about urban-centered growth and references the principle of "smart growth" (Policy Ag/LU-23). Also, many policies have been included that encourage alternative modes of transportation and less reliance on the automobile along with new development in existing urbanized areas, which are principles of "smart growth."

Response 113-4 P: Commenter notes the County needs to be proactive with "smart growth" policies to ensure growth is directed to existing urban areas where services exist and proper infill policies. See Response 113-3 P.

Response 113-5 P: Commenter requests that the term "already developed areas" as seen on page 14 and 15 of the proposed General Plan Update be replaced with a more specific term, such as "existing incorporated areas and already urban or urbanized areas." This change has been made throughout the Revised General Plan Update as appropriate.

Response 113-6 P: Commenter requests that page 18 of the proposed General Plan Update state that housing strategies should be limited to Napa County's workforce at all levels. The County appreciates the commenter's input on this issue. See Policy Ag/LU-30 regarding strategies proposed to meet the state and regional housing needs allocation.

Response 113-7 P: Commenter notes the need for preservation of agricultural watersheds and open space (AWOS). The commenter's statement associated with this issue is understood. It is the intent of this General Plan Update to preserve AWOS. Please see the open space conservation policies at the beginning of the Conservation Element.

3.0 COMMENTS AND RESPONSES TO COMMENTS

- Response 113-8 P:* Commenter objects to the designation of the Hess Vineyards as industrial use due to the loss of agricultural land uses and requests the use be changed to "transitional." The proposed General Plan Update has been revised and now proposes that the Hess Vineyards property be designated Agriculture, Watershed and Open Space (AWOS).
- Response 113-9 P:* Commenter requests that existing industrial lands not be identified as "transitional" and specific plans be developed by the County instead to identify the best use for the land. The Revised General Plan Update has eliminated the term "transitional," and any property proposed for that designation is now known as "study area."
- Response 113-10 P:* Commenter states that the use of "urban bubbles" is inappropriate and asks that the County identify urban areas using actual zoned non-agricultural areas. The Revised General Plan Update removes areas currently zoned for agricultural use from two of the "bubbles" (Angwin and Berryessa Estates) and commits the County to a future planning process addressing the remaining 10 "bubbles." County staff believes that elimination of all the bubbles would be infeasible for the reasons explained in the Alternatives Master Response 3.4.2.
- Response 113-11 P:* Commenter notes that the property rights provisions in all sections of the document have no reason for consideration, as they are not land use provisions that can be enforced outside of existing state law. The County appreciates the commenter's input on this issue.
- Response 113-12 P:* Commenter notes that interagency cooperation must be strengthened. Commenter suggests retaining Goal #4 of the existing General Plan in order to do this. Three policies in the Agricultural and Land Use Element relate to interagency cooperation under the heading of that name.
- Response 113-13 P:* Commenter notes that Policy Ag/LU-120 on page 106 provides an exception to the General Plan, which will weaken the Growth Management System. The County appreciates the commenter's input on this issue. This policy has been eliminated from the Revised Draft General Plan Update.
- Response 113-14 P:* Commenter requests that the Recreation and Open Space Element include a reiteration of the four reasons for open space preservation set forth by Government Code 65560 in the Element. The County appreciates the commenter's input on this issue and has attempted to add information to the Recreation and Open Space Element that would allow the reader to identify all locations within the document where open space is addressed. This includes the Conservation Element, the Agricultural Preservation and Land Use Element, the Safety Element, and the Community Character Element in addition to the Recreation and Open Space Element.

3.0 COMMENTS AND RESPONSES TO COMMENTS

Letter 114

June 18, 2007

Patrick Lowe
Napa County Dept. Conservation, Planning and Development
11905 Third St.
Napa, CA 94559

Re: General Plan Update:

Dear Mr. Lowe,

The California Native Plant Society has already submitted some detailed comments on issues and data inclusions in the General Plan Update. We would like to state a few general recommendations regarding the future of the county in land use planning.

114-1E/P

Of primary importance is the use of sound scientific data in making land use decisions. Under the pressure of land developers it is often easy to lose sight of the environmental big picture. With so much habitat that has already been lost or compromised by disturbance, land preservation needs to be balanced against land conversion. We hope that the county will take a more active position in conservation by seeking the resources to fund its County Parks System. A sound funding system would allow Napa County to preserve significant habitats that the Land Trust is not able to. It may also allow the county to complete some of the goals and recommendations set out by the County Baseline Data Report.

The county must also take a more active role in habitat restoration. With all the environmental problems faced at the global level, we must focus on creating a sustainable environment within Napa County. Restoration of wetlands, riparian systems and grasslands all help to do our part in controlling climate change and ensuring functional plant/animal interactions. The Watershed Conservancy is an ideal vehicle for guiding this process. We hope that you will give these points some serious consideration as you complete the General Plan Update.

Sincerely,

Jake Ruygt
Napa Valley Chapter
California Native Plant Society
3549 Willis Drive
Napa, CA 94558

3.0 COMMENTS AND RESPONSES TO COMMENTS

LETTER 114: JAKE RUYGT, CALIFORNIA NATIVE PLANT SOCIETY, JUNE 18, 2007

Response 114-1 E/P: Commenter notes land preservation needs to be balanced against land conversion. Commenter asks the County to fund the County Parks System and to take a more active role in habitat restoration. Commenter is referred to the Biological Resources Master Response 3.4.3 and Action Items in the revised Conservation Element Natural Resources section.

3.0 COMMENTS AND RESPONSES TO COMMENTS

Letter 115

Joseph Fischer
534 E. Spring Street
Napa, CA 94559

Hillary Gittleman and Planning Staff
Napa County Department of CD&P
Atten: General Plan Comments
1195 Third Street, Suite 210
Napa, CA 94559

Dear Staff:

Thank you for all your hard work on the plan.

I am writing regarding the land use portions of the draft general plan. I am submitting general comments and relying on you and the staff to determine how it relates to specific policies or the interplay of specific policies.

I strongly support the emphasis on preserving agriculture and managing the county's (including the city's) growth. I and almost everyone I know is very clear that our agricultural character is what makes us unique and that we do not want to head down a path of looking like many, many cities and counties in the Bay Area.

115-1P

For some time, I have felt that the current 'in-fill' policy of Napa City is not working. While the stated desire and possibly the General Plan's goals are to preserve the nature and character of the existing neighborhood, to my eye, there is a significant amount of discontinuity that has been permitted in current building permitting and design approval. What I see are the equivalent of almost 'cancerous growths' springing up in existing neighborhoods characterized by smaller houses and bigger yards.

At the same time, we do have needs for additional housing. In particular, we need housing for the many single and younger people that work in our county's tourism, hospitality, restaurant, winery, and agricultural industries. I also see a need for new housing options for the many seniors or soon to be seniors that are 'over-housed' in their current situation. Finally, I recognize that the economics of developers and the simple market demand for bigger houses is driving demand.

The best alternative to address our housing goals is to take advantage of opportunities to build and offer high density housing in, or close to our urban centers. Ideally, such high density residential should easily 'transition' to surrounding neighborhoods. (And of course, the traffic and other impacts of such high density developments need to be addressed and mitigated.).

3.0 COMMENTS AND RESPONSES TO COMMENTS

The Napa Pipe property, in particular is an opportunity that the County should take advantage of. In observing the current owners' analysis of our situation and their proposals, I think they have captured the essence of a solution that addresses many of the goals that many Napa County residents and employers share. In looking at the transitional lands designation and permitted uses, I would consider having them match the spirit of what Napa Redevelopment Partners has proposed.

115-2P

Because it is such a large space, you have the ability to transition effectively to a dense 'core.' It would offer cost effective housing to many of the people already working here, reducing the service demand of our major inroads. It would provide a transitional housing alternative for the many seniors that live in houses that would make great starter homes for other people ready to start or expand a family. They could keep their Napa County property tax base, pocket some of the gain on their house, and be in a superior, lower maintenance residence with better access to public services. Its design is also diverse in offering different alternatives for other buyers as well – well-heeled residents as well as people that qualify for affordable housing. The design also contemplates a number of centrally located amenities and services that in mind keeps additional car trips off the roads as opposed to more 'cul-de-sac' developments.

The rallying cry against Napa Pipe and any other similar proposal in the future is two fold – our potential loss of an industrial site, and the fear factor of so many residences being proposed.

First, the 'loss' of industrial capacity. While I support the idea of economic diversity, I strongly believe that Napa County as a site for 'heavy industrial capacity' is a non-starter based simply on the economics of transportation and workers. The economic commercial capacity expansion will likely be in primarily service businesses or in the so-called 'clusters' that support the existing wine and growing food industry here. I support the idea of concentrating industrial growth in the South County area, and recall that the current proposal by NRD anticipates commercial/light industrial on another portion of the property.

Second, the numbers game. One of the current ideas (in part as a result of Measure A) is to incrementally increase housing stock in response to the allocations handed down to us from the State via ABAG. There is also the politically sensitive game of approving large blocks of development or re-development. From my perspective, the general plan and our local government should have the flexibility to act on large projects. If it is limited to incremental permitting only, we will perpetuate small in-fill projects that don't really work. We will lose opportunities to think globally and long term in designing something that really 'fits' for our community, our aesthetic, and our economy.

115-3P

The best path to smart growth in my opinion is a series of opportunistic 'bumps' in housing stock instead of a level line.

A related issue is the overarching issue of housing allocations. As our ABAG allocations are made separately to the Cities and the County, lack of cooperation between these

3.0 COMMENTS AND RESPONSES TO COMMENTS

entities creates problems for us and perpetuates the same problem. I would like to see something in the General Plan (although this is likely dreaming) that states that the Cities and County will coordinate on the reallocation of housing numbers from ABAG to accomplish the County-wide goal of smart growth that facilitates the workforce, demographic, transportation and agricultural preservation goals. This would, for example, permit the County to absorb the allocation from the cities when there is a significant opportunity present like Napa

115-3
cont'd

Pipe. Later, it is up to the cities to take up the numbers from the County. While the County and Cities may chafe at this idea. As a resident of both the City and the County. I expect my local representatives to do a better job of coordinating growth between themselves than an amorphous entity governing a larger area.

115-3P
cont'd

Respectfully,

SUBMITTED VIA E-MAIL

Joe Fischer
534 E. Spring Street
Napa, CA 94559

707-738-5853

3.0 COMMENTS AND RESPONSES TO COMMENTS

LETTER 115: JOSEPH FISCHER, [UNDATED]

Response 115-1 P: Commenter feels that the infill policy is not working. Commenter cites the need for additional housing to house the employees of the tourism, hospitality, restaurant, winery, and agricultural industries. Commenter notes the need for a focus on higher-density close to urban centers with uses that "transition" to surrounding neighborhoods. The County notes that the following policies, which seek to support urban-centered growth, are included in the General Plan. These policies include Policy Ag/LU-22, -23, -26, -28, and -27.

Response 115-2 P: Commenter supports development of the Napa Pipe property in order to create a dense "core" while providing a transitional housing alternative for seniors who are currently living in houses, freeing those houses for families. Commenter doesn't feel the County needs the industrial space provided by Napa Pipe. The proposed General Plan Update has been revised and now designates the Napa Pipe site as Industrial with a Study Area designation (under the Preferred Plan) that would allow for future considerations of land use changes to the site. However, the General Plan Update does not establish any use of the site beyond industrial.

Response 115-3 P: Commenter notes that the General Plan and local government should have the flexibility to act on large projects. Commenter asks that the proposed General Plan Update include stronger coordination between cities and the County regarding the Association of Bay Area Governments (ABAG) allocations. Policy Ag/LU-30 includes a variety of strategies to work with ABAG to meet state and regional housing need allocations.

3.0 COMMENTS AND RESPONSES TO COMMENTS

Letter 116

Napa Pipe Project

To Whom It May Concern:

I cannot state too enthusiastically my interest in and approval of the proposed conversion of the blighted Napa Pipe property. What is truly rare and good has happened – something discarded can be reborn as a useful, beautiful project that could save valuable and irreplaceable agricultural land, improve and preserve views and protect this valley's treasure.

I write this as heavy equipment chugs and lumbers on the former Hussey land behind my own. There is a road being built within view of my bedroom, dining room and living room. For reasons beyond my understanding the Hussey project was deemed good and desirable over the protests of many local residents. These good people pointed out how the Hussey project would put many more cars on local roads unsuited to even the current level of traffic. The need for low cost starter homes and living designs that met more complex needs was declared. Attention to the needs of underserved groups was sought. In meetings with the developers we begged for a development that would save land as recreational resource for enjoyment by residents. We saw no result to our efforts. Build out the city limits was the mandate, no matter how.

The Napa Pipe project is all I could hope to find in a development because the project is designed with a sensibility of what makes a life, and what makes a vibrant community. The mix of retail with high-density housing, planned-in recreational opportunities for sailing and gardening, attractive public areas for gathering are all the very best components of what is found in older cities that have learned their lessons – be they Chicago, San Antonio, London or Madrid.

In contrast, how does anticipated development of the beautiful slopes of the Ghisletta land truly benefit us as a community? Yes, it brings property into increased taxation rates of residences and business. Unfortunately, modest gains are at the cost of putting people so near a busy highway as to risk health (recent Napa Register article citing asthma incidence increases with proximity to roadways), too near highway noise to be able to enjoy one's surroundings – this I know well, having lived adjacent to the Nimitz Freeway from 1954-1965 – at the cost of forever losing what ought remain a beautiful entry to the west side of the Napa Valley. The loss of land in agriculture – this county's *raison d'etre* – ought be reason enough to quash building in view of the highway. Other questions are legion: what kind of housing? emergency response time? traffic and access? Where are the grocery stores?

I am reminded of the differences between Medford, Oregon and neighboring Ashland. The former appears to have never seen a big-box store it didn't want, while Ashland makes you want to get out of your car and meet people. Medford

116-1E/P

could be any over-grown suburb and Ashland has heart and IS SOME PLACE. We in the Napa Valley need to learn the difference and how to achieve it now.

116-1E/P

Is Napa's General Plan so limited and limiting that we must reject progressive solutions to our housing and quality of life issues?

The Napa Pipe project provides better housing for more people, in a meaningful context of community, with vision and creativity. The Napa Pipe project deserves the full and resourceful support of the people's representatives at all levels of government in Napa.

Sincerely,

Judy du Monde
1081 Stoneybrook Drive
Napa, California 94558

3.0 COMMENTS AND RESPONSES TO COMMENTS

LETTER 116: JUDY DU MONDE, [UNDATED]

Response 116-1 E/P: Commenter approves the concept for development of the Napa Pipe property, but opposes the development of the slopes of the Ghisletta land due to viewshed issues. The County appreciates the commenter's support of the Napa Pipe project. The proposed General Plan Update has been revised and now designates the Napa Pipe site as Industrial with a Study Area designation (under the Preferred Plan) that would allow for future considerations of land use changes to the site. However, the General Plan Update does not establish any use of the site beyond industrial.

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Letter 117

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ROGAL + WALSH + MOL

June 18, 2007

Mr. Patrick Lowe
Napa County Office of Conservation,
Development and Planning
1195 Third Street, Ste. 201
Napa, CA 94559

Re: Napa Redevelopment Partners' comments on Napa County Draft General Plan Update

Dear Mr. Lowe:

I am writing on behalf of Napa Redevelopment Partners, owners of the Napa Pipe site. As property owners, potentially affected by the changes proposed, we thought it important to state our support for the Draft General Plan Update.

Clearly, the Draft General Plan represents a great deal of thoughtful work by the members of a diverse Committee. The document acknowledges the substantial demographic and economic changes that have occurred in the County since the current General Plan was adopted in 1983 — a period of time in which the industrial operations formerly conducted on our property grew, prospered, and then became obsolete. The members of the Committee in their deliberations, and the text of Draft Plan itself, acknowledge the County's responsibility to provide housing opportunities for all Napers, and implicitly recognize the fact that new approaches are needed to accomplish this increasingly difficult task. When we acquired Napa Pipe, and sought public input to shape its reuse plan, we heard this theme sounded with overwhelming frequency.

The Draft General Plan takes a progressive approach to a pressing problem, by proposing that the obsolete operations on the Napa Pipe site could be replaced, following detailed site-specific planning, with a new, mixed-use development, better-suited to meet the needs of Napa today. In targeting infill sites for compact redevelopment, the Update continues the County's long-standing leadership in protection of agricultural lands from development pressure.

In many ways, the Napa Pipe site embodies the changes that have occurred in the Napa Valley over the years. For the second time in its history, this site is at the midst of the County's employment growth. When the site was first urbanized in 1940 as the Basalt shipyard, it constituted a major transformation in County lands and County life. It was a large-scale and

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117-1P

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ROGAL + WALSH + MOL

Mr. Patrick Lowe
June 18, 2007
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intensive development of unincorporated County lands and became the dominant employer in the community. It is reported that at times there were more than 2,000 employees, when the entire population of the City of Napa was less than 14,000. During those early days of this site's development, housing was built immediately adjacent to accommodate the employment-driven population increase. In subsequent decades, the enormous growth of the wine industry and associated tourism led to a shift in economic activity upvalley. Grape growing and winemaking have increased and the Agricultural Preserve was created to help ensure the long-term primacy of those uses. As a result of growth in the wine industry, and the fact that most available County land is devoted to agricultural use, there is little land available to accommodate associated growth in employment and housing.

117-1P
cont'd

Over the past fifteen years, most of the County's employment growth has been centered in the South County, and this trend is expected to continue for the foreseeable future. While downtown Napa and some other limited areas are identified for future redevelopment, the bulk of job creation is destined for the South County's industrial parks. Meanwhile, there has also been steady and significant growth in institutional employment in South County, namely the State Hospital and the Napa Valley College (as well as other relatively nearby institutions, the Queen of the Valley Hospital and the Veterans Administration Hospital).

The shift in job location places Napa Pipe at the center of the County's largest employment concentration. Directly adjacent to Napa Pipe are the Napa Valley Corporate Park and the Enterprise Industrial Park/900 Business Park, with about 3,000 jobs, all within walking distance. Within just a two-mile radius it is estimated that there are over 10,000 jobs. To the extent that growth in the wine-making, bio-tech and bio-med sectors continues, that growth will occur in proximity to the Napa Pipe site. Napa's economy is strong, but its ability to provide housing for its workforce is very limited by the lack of available land. As a result, about 13,000 people commute to Napa County every day from areas with a more affordable housing stock, generally traveling over Jamieson Canyon Road.

The closure and sale of the Napa Pipe operation freed up this site, which is the largest urbanized and infrastructure-served site available for re-use in Napa County. The property's size, level grade, connection to municipal water and sanitation services, its own well water supply, its proximity to major roadways and job centers, its location near a major City park and its expansive river and hillside views, make it exceptionally well-suited for residential redevelopment. River, rail and trail connections make it a place from which Napers could easily travel to work via transit, ride-share, bicycle, or foot, reducing commuter traffic. Current plans for roadway improvements, developed by County staff, Napa County Transportation Planning Authority, Caltrans and other public agencies, will make the site even more accessible.

As envisioned by the General Plan Update, the potential for redevelopment of industrially-designated lands such as our Napa Pipe property into compact, mixed-use

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3.0 COMMENTS AND RESPONSES TO COMMENTS

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ROGAL + WALSH + MOL

Mr. Patrick Lowe
June 18, 2007
Page 3

residentially-focused neighborhoods could help to relieve growth pressure on the County's agricultural land and on the City of Napa's existing residential neighborhoods, without displacing agriculture or open space. It would put people where the jobs are, reducing commuting. And it would provide housing to many of those for whom the typical new single-family detached home is not affordable or appropriate. Our plans propose doing so in a pedestrian-oriented neighborhood, designed in accordance with the best practices of environmentally responsible land planning.

117-1P
cont'd

We offer the attached technical amendments to the Draft General Plan Update, and once again emphasize our support for this thoughtful, well-reasoned, and responsible draft plan.

Sincerely,



Keith Rogal

cc: Hillary Gitelman
Sean Trippi

Attachment

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3.0 COMMENTS AND RESPONSES TO COMMENTS

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Napa Redevelopment Partners
Comments on Draft Napa County General Plan Update
June 18, 2007

All proposed changes to Land Use Element. Proposed text additions underlined:

1. **Page 48, Land Use Element Policy Ag/LU 47.** Revise text in paragraph beginning "Minimum Parcel Size":

Minimum Parcel Size: Parcel sizes shall be as established for the Urban Residential, Commercial, and Industrial designations, depending on the use, or as determined through site-specific planning. | 117-2P

2. **Page 106, Land Use Element Policy Ag/LU 120:**

Certain predominantly multi-family residential project proposals, if they meet specific requirements, may—at the discretion of the Board of Supervisors—be allowed to exceed the annual building permit limits outlined in the Growth Management System. These requirements include, but are not limited to: Located in nonagriculturally designated lands; Are subject to a phased development plan; Would make a substantial contribution to meeting the County's State-mandated housing needs; and, Would include a significant affordable housing component. | 117-3P

12481.001.634427v1

3.0 COMMENTS AND RESPONSES TO COMMENTS

LETTER 117: KEITH ROGAL ON BEHALF OF NAPA DEVELOPMENT PARTNERS, JUNE 18, 2007

Response 117-1 P: Commenter, on behalf of the owners of the Napa Pipe site, supports the proposed General Plan Update. Commenter provides the history of the Napa Pipe site and efforts to guide its reuse. Commenter supports designation for residential development. The County appreciates the statements of support by the commenter regarding the Napa Pipe site. The proposed General Plan Update has been revised and now designates the Napa Pipe site as a Study Area designation that would allow for future consideration of land use changes.

Response 117-2 P: Commenter requests addition of text to Policy Ag/LU-47 to read as follows (inserted text underlined): "Parcel sizes shall be established for the Urban Residential, Commercial, and Industrial designations, depending on the use, or as determined through site-specific planning." See Response 177-1. The referenced policy has been eliminated due to designation of the site as a "Study Area." Thus, parcel sizes would be those established for the "Industrial" designation until future planning is completed.

Response 117-3 P: Commenter requests addition of "predominantly" to Policy Ag/LU-120 to read as follows (inserted text underlined): "Certain predominantly multi-family residential project proposals, if they meet specific requirements. . ." The referenced policy has been eliminated in the Revised General Plan Update so that any project requesting exemption from the County's growth management system requirements would require a General Plan amendment.

3.0 COMMENTS AND RESPONSES TO COMMENTS

Letter 118



June 15, 2007

Ms. Hilary Gitelman, Director
Napa County Conservation, Development
and Planning Department
1195 Third Street, Suite 210
Napa, CA 94559

Re: Napa County General Plan Update/Agricultural
Preservation and Land Use

Dear Ms. Gitelman:

On behalf of the Jackson Family, landowners and farmers in Napa County, we are writing this letter to offer our comments on the draft General Plan Update.

Our comments are particular to policies set forth in the Agricultural Preservation and Land Use section of the draft General Plan Update. Policies Ag/LU-93, Ag/LU-99 and Ag/LU-104 allow for the perpetuation of existing and historic land uses in certain small developed areas along Hwy 29 in Oakville, Rutherford and South St. Helena, none of which are not reflected on the General Plan Land Use Map. These existing and historic uses have been part of the County's character and foundation for years.

118-1P

While we commend the County for doing what makes sense with regard to the areas addressed in the above-mentioned policies by recognizing the importance of continuing the vital uses in these areas, we note that the draft General Plan Update fails to similarly recognize the existing and historic vital uses in the North St. Helena area along Highway 29. We therefore propose that, in order to recognize North St. Helena's existing and historic uses and to allow those uses to continue in the same manner as they have in the past, new policy language specific to North St. Helena should be included in the General Plan Update.

The language we propose could be included in a section following the South St. Helena section in the current draft General Plan Update and would read as follows:

North St. Helena

Description: North St. Helena is another area of commercial and residential uses located along Highway 29 and Lodi Lane which is not reflected on the General Plan Land Use Map. Uses here include several wineries, a variety of commercial establishments

3.0 COMMENTS AND RESPONSES TO COMMENTS

Page Two
Ms. Hilary Gitelman, Director
June 15, 2007

including restaurants, offices, a retail outlet center and lodging. These uses are primarily located on property zoned for commercial uses while some have been established on land zoned for agriculture. 118-1P
cont'd

Policies:

Policy Ag/LU-107: All land zoned and/or used for commercial uses in the North St. Helena area as of February 1, 1990 shall be allowed to develop consistent with uses allowed in the CL zoning district as if it were designated on the Land Use Map for these uses. 118-2P

It is our belief that this language will create consistency within the General Plan Update by recognizing existing and historic uses along the Highway 29 corridor and by allowing those uses to continue as they have in the past.

Alternatively, if the County believes that the policies noted above in the current draft General Plan Update should be expanded to comprise the entire County in order to recognize historic and existing uses County-wide, the County may choose to eliminate the three policies specific to Oakville, Rutherford and South St. Helena and replace them with a new policy that applies County-wide (thereby covering North St. Helena as well). Such a policy could state:

Policy Ag/LU - All land zoned/or used for commercial or residential uses throughout the County as of February 1, 1990, shall be allowed to develop consistent with their zoning designation as if they were designated on the Land Use Map for these uses.

We thank you for the opportunity to provide input on the draft General Plan Update as it is an important governing document that impacts our land holdings and our community. Thank you for your consideration of these comments.

Sincerely,



LeeAnne Edwards
Vice President, Real Estate
Jackson Family Services

cc: Napa County Board of Supervisors
Mr. Clay Gregory, Jackson Family Wines
Mr. Lenny Stein, Jackson Family Services

3.0 COMMENTS AND RESPONSES TO COMMENTS

LETTER 118: LEEANNE EDWARDS, JACKSON FAMILY SERVICES, JUNE 15, 2007

Response 118-1 P: Commenter remarks on the historic vital uses within North St. Helena area along Highway 29. As such, the commenter provides additional language describing North St. Helena to be added to the appropriate section of the Agricultural Preservation and Land Use Element. The commenter also requests an additional policy within that section which reads as follows: "All land zoned an/or used for commercial uses in the North St. Helena area as of February 1, 1990, shall be allowed to develop consistent with uses allowed in the CL zoning district as if it were designated on the Land Use Map for these uses." The County appreciates the commenter's input on this topic and has attempted to address the commenter's concerns without adding a new "North St. Helena" section to the document. Specifically, Policy Ag/LU-45 would allow commercial use of commercially-zoned property, and Policy Ag/LU-46 would allow continuation of legal non-conforming commercial uses.

Response 118-2 P: Commenter proposes that it may be necessary to apply the additional policy shown in Response 118-1 P above to the entire land use map comprehensively. The County appreciates the commenter's input on this topic. However, this change was not made. Please see Response 118-1 P above.

Letter 119

Lucy White / Lake Berryessa Land Owner

Napa County General Plan Comment 6/18/07

Hillary Gitelman –

The draft Napa County General Plan [Plan] has incorporated some to the major elements of East Napa County which have the potential of improving the land and economic values of the areas. There continues to be issues which should be reviewed.

119-1P

The Plan still lacks the luster of the enormity of recreation use and potential of the Lake Berryessa community. The lake is a major asset of this county, which the Plan views as having past its "heyday!!" That is an astonishingly naive perspective. The Plan alternately should be embracing this opportunity, which coincides with the upcoming new contracts, by pairing the Napa Valley amenities with those of the Eastern Napa complimentary amenities of recreation and tourism.

Regarding the Lake Berryessa Policy Ag /LU-74 I think that you are doing a disservice to the Pope Creek area. Your position that "Pope Creek is envisioned as a quiet lakeside refuge..." lacks vision and recognition of geographic dynamics. I would propose that you create the structure that would allow the Pope Creek area to be the gateway from both northern Napa Valley and Lake County – which could better promote the area as a greater destination for all visitors.

119-2P

As you know we are owners of 52 acres adjoining Rancho Monticello Resort, of which we are also owners. The Bubble issue on our land is that the area in the Bubble is quite steep. We are considering developing affordable housing on the parcel. As is stands we could build approximately 36-60 units on the "Bubble 12 acres" with only 3 acres of that land less than 30% grade. If the Bubble could be moved to flatter land on our parcel we could then develop up to 300 condo units, with 60-75 being affordable housing. Spanish Flat land in the Bubble should also be moved, as it is the land either has no view or is ridgetop, ideally that Bubble to be moved to enhance development on land with views – adding greater value to its development. With the change in the concessions, the success of the area will be more dependent on good and affordable housing of fee land.

In conclusion, following is a recap of what I submitted to you as a comment September 2006. It is recognized that you have attempted to consider many of the issues. In the Plan still greater consideration should be given to what "East Napa County" and Napa Valley have which are similar, different and complementary.

1] Tourism*

- a] Millions of visitors come to Napa Valley every year with interests in- wine, food, culture
- b] Millions of visitors come to Lake Berryessa every year with interests in water sports and recreation
- c] Wooden Valley and Pope Valley have the potential of attracting significant tourism – scenery, destination spots, wineries

119-3P

*Tourism must be supported with a certain level of development and services that draw and accommodate the tourists

Q] What can be done to optimize this industry – COUNTYWIDE - ?

A] Marketing, Supportive Media, Planning, Development, Area Specific Attractions, Interrelated Activities – tours, packages....

2] Character*

- a] Napa Valley has a specific character that sustains the community in a positive manner
- b] Lake Berryessa has a specific character that has great potential for sustaining the community – both which can be greatly improved
- c] East Napa County – most areas lack character development that is identifiable

119-4P

* Character of Napa Valley has been encouraged and allowed to expand, while East Napa Character is regressive.

Q] What can be done to build character of East Napa County various areas?

3906 Silverado Trail / Calistoga, CA 94515
6590 Knoxville Road / Napa, CA 94558
707 799 2120 / fax 707 966 0207

LBLandOwnersGenPlan6.07

3.0 COMMENTS AND RESPONSES TO COMMENTS

Lucy White / Lake Berryessa Land Owner

<p>A] Area specific visions / planning / development – build / maintain relationship with Napa Valley – and vice-a-versa Napa Valley build / maintain relationship with various areas and attractions in East Napa County - ie “Outlying Bed & Breakfast,” “Howell Mountain / Pope Valley / Childs Valley / Wooden Valley Wineries,” “Scenic Routes with Destination Stops / Services”</p>	<p>119-4P Cont'd.</p>
<p>3] Community a] Napa Valley has both an overall and city / town community basis that supports the needs of industry and local residences b] Lake Berryessa has resort areas that support a certain level of “community” which needs to be developed and strengthened. c] East Napa County – the sense of community is modest</p> <p>* Communities in East Napa County have fewer services and facilities to support local residences than in the 1970s / 1980s. Problems / Turning Points 1] 1974 when Napa County abandoned Lake Berryessa – 2] 1980 Plan Zoning – 3] Unresolved issue and lack of development with the Bubbles.</p> <p>Q] What can be done to support and strengthen the East Napa County communities? A] Strengthen the bond between Napa Valley and East Napa County as the Napa County Community and strengthen the integrity of the individual communities.</p>	<p>119-5P</p>
<p>4] Recreation* a] Napa Valley offers various recreational areas/activities/services b] Lake Berryessa offers various recreational areas/activities/services – boating, swimming, water sports, fishing, bicycling / bicycle races, triathlons, outdoor recreation, camping, getaways, recreational destinations c] East Napa County – should be recognized as a greater asset that expands recreational opportunities</p> <p>*Recreation needs to be addressed as a Greater Element of the General Plan – the current “Recreation and Open Space” Element is truly only an Open Space Element and extremely objectionable.</p> <p>Q] What can be the General Plan do the increase the recreational aspect of Napa County? A] Recognize all the recreational uses and potential uses on all levels, local, regional and “destination type.” Allow / support increased development in East Napa County that can broaden the appeal of the area – restaurants, hotels, bed & breakfast, gas stations, services, activities [golf, tennis, spas]</p>	<p>119-6P</p>
<p>4] Industry / Business a] Napa Valley has industries and businesses that build and support the community – with room for growth and expansion b] East Napa County* has limited industries and businesses to build and support the community, while businesses that do exist in the rural settings are unreasonable restricted by the zoning related to suburban areas</p> <p>*Industries / Businesses are suppressed by current conditions – ie construction cannot store equipment to allow for reasonable business use and access</p> <p>Q] What are the obstacles for businesses in East Napa? A] Lack of supplies, services and appropriate zoning.</p>	<p>119-7P</p>
<p>Summary / Solutions The General Plan needs to recognize East Napa County issues and work to integrate solutions that will benefit the communities and industries countywide.</p> <p>East Napa County Areas – Angwin / Howell Mountain, Pope Valley [Aetna Springs], Butts Canyon, Stage Coach Canyon, Chiles Valley, Sage Canyon, Capell Valley, Lake Berryessa and Berryessa - Parcels, Homes, Subdivisions and Developments, Wooden Valley</p>	<p>119-8P</p>

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Lucy White / Lake Berryessa Land Owner

Assets – Lake Berryessa Recreational Area, R Ranch, Angwin Airport, Pacific Union College, PUC Observatory, Historical Pope Valley, Wineries, Scenic, Aetna Springs, Las Posadas Demon State Park

Suppressed / Shutdown Assets – a] Pope Valley Usabelli's Restaurant & Motel / Pope Valley Airport / Airstrip, b] Lakeside Gas Station, Lakeside Store, Pizza Parlor at Lakeside c] Gas Stations at Turtle Rock – Spanish Flat – Sugar Loaf – Pope Valley d] Boy Scout Camp at Lake Berryessa e] Shops at Sugar Loaf f] Spanish Flat Hardware & Building Supply - Boat & Auto Supply / Repair – Barber & Beauty Shop - Pizzeria – Community Health Center – Saloon g] Grammar School at North end of Lake Berryessa h] Turtle Rock Motel

Key Issues in East Napa County include –

- a] Zoning – what existed, what exists, what can and/or should develop
- b] Local Power – to decide what is best for the community
- c] Unique Identity – Build Identities / Area Specific

Bubble Issues [BI]

BI Note - Lucy White, Robert White, Clarence White, Martha White [Area 2] also owners of Rancho Monticello Resort – [Area 3 / Area 8]

BI Note - Jim Kenny, Lee Johnson, Rich Delaney – [Area 3 / Area 8] also owners of Spanish Flat Resort –

In all areas bubbles need to follow parcel boundaries. Where there is partial inclusion in the "Rough Bubble" the total parcel area needs to be mapped into the "Actual Bubble. It is apparent that the Bubble was drawn in general areas and the New General Plan needs to clarify those boundaries. The following is inclusive of areas related to Lake Berryessa. I am specifically responding to Areas 2, 3 and 8, but we have included Areas 1 and 4 to show their existing and anticipated uses.

#1 Vision of the Future - Berryessa Estates

Mini-Mart – existing – What zoning exists? What potential further development is possible? Is it adequately servicing the community?
Residential - existing

#2a Vision of the Future – Pope Creek North – North of Putah Creek Resort

- New Development -
Modular Home Development in Progress

#2b Vision of the Future – Pope Creek South – West of Rancho Monticello Resort*

- New Development - expand Bubble to include all parcel boundaries
Residential Housing
Modular Home Community
Recreation – Getaway
RV and Vacation Sites
Commercial Storage

**Lucy White, Robert White, Clarence White, Martha White request Napa County General Plan review of fee land*

#3 Vision of the Future - Spanish Flat – North of Spanish Flat Resort*

- New Development - expand Bubble to include all parcel boundaries
Preserve Commercial Zoning
Modular Home Community
RVs
Mini-Mart [either at Spanish Flat or Sugar Loaf / now Arco Storage]
Gas Station [either at Spanish Flat or Sugar Loaf / now Arco Storage]

**Jim Kenny, Lee Johnson, Rich Delaney – [Area 3 / Area 8] request Napa County General Plan review of fee land*

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LBLandOwnersGenPlan6.07

119-8P
cont'd

119-9P

3.0 COMMENTS AND RESPONSES TO COMMENTS

Lucy White / Lake Berryessa Land Owner

#4 Vision of the Future - Berryessa Highlands
Residential Housing – existing

#8 Vision of the Future - Moskowitz - The Corners – Location where highways 121 and 128 intersect – turn to go to Steele Park Resort
- New Development - expand Bubble to include all parcel boundaries
Mini-Mart
Gas Station
Planned Development – Mobile Home Park
Modular Home Community
Residential Housing

**Jim Kenny, Lee Johnson, Rich Delaney – [Area 3 / Area 8] request Napa County General Plan review of fee land*

Note – The uncertainty of the concession contracts has depressed the entire Lake Berryessa community. With New Contracts the area should have a very favorable visitation and investment into the community, both on federal and private lands. ROD requires foundations for long term sites which guarantees a high level of permanency in the community.

Thank you for this opportunity to submit input regarding the Napa County General Plan.

Sincerely,

Lucy White
707 799 2120
lucy@wwwwhite.com

119-9P
cont'd

3906 Silverado Trail / Calistoga, CA 94515
6590 Knoxville Road / Napa, CA 94558
707 799 2120 / fax 707 966 0207

LBLandOwnersGenPlan6.07

3.0 COMMENTS AND RESPONSES TO COMMENTS

LETTER 119: LUCY WHITE, JUNE 18, 2007

Response 119-1 P: Commenter objects to the proposed General Plan Update description of the Lake Berryessa recreational opportunities as “past its heyday” and requests that the plan embrace the recreational opportunities provided by the Lake Berryessa Community. The County appreciates the commenter’s input on this issue. Several policies address the Lake Berryessa communities in the Agricultural and Land Use Element, in particular those under the headings of Lake Berryessa, Moskowitz Corners, Pope Creek, and Spanish Flat. Please also see new policies in the Economic Development Element.

Response 119-2 P: Commenter objects to Policy Ag/LU-74’s description of the Pope Creek Area as a “quiet lakeside refuge” and requests that the proposed General Plan Update include a structure by which Pope Creek would be a gateway to the Napa Valley and Lake County. Additionally, the commenter requests that the urban bubble overlaying their property adjoining the Rancho Monticello Resort be modified to overlay portions of their property that exhibit gentler grades in order to facilitate the commenter’s plans to build affordable housing in that area. The commenter’s statements associated with this are understood; however County staff disagrees with the characterization of Pope Creek as a “gateway.” Also, the commenter’s suggested change to the “bubble” boundaries would require a Measure J vote. Please see Action Item Ag/LU-114.1 for the County’s commitment to systematically review all of the “bubbles” in the coming years.

Response 119-3 P: Commenter provides a review of comments previously submitted by the commenter regarding the benefits and opportunities for tourism. Commenter notes that tourism can be optimized by marketing, supportive media, planning, development, and services that draw tourists. The commenter’s statements associated with this are understood. Tourism issues are addressed in the Economic Development Element.

Response 119-4 P: Commenter provides a review of comments previously submitted by the commenter regarding establishment of character for Napa County. Commenter notes that character is best established by specific visions/planning/development for each region in the County. See the Community Character Element for many relevant policies and action items as well as the sections for each region in the County in the Agricultural and Land Use Element. Together these form the established character for Napa County.

Response 119-5 P: Commenter provides a review of comments previously submitted by the commenter regarding the existing communities in the County. Commenter notes the bond between Napa Valley and East Napa County should be strengthened. Many policies have been included that include all areas of the unincorporated County in the Agricultural and Land Use Element.

Response 119-6 P: Commenter provides a review of comments previously submitted by the commenter regarding recreation opportunities in Napa County.

3.0 COMMENTS AND RESPONSES TO COMMENTS

Commenter notes the recreation aspect in the proposed General Plan Update could be increased by recognition of the broad opportunities in the area. The commenter's statement associated with this issue is understood. Recreational opportunities have been comprehensively addressed in the ROS Element.

Response 119-7 P: Commenter provides a review of comments previously submitted by the commenter regarding the benefits of industry and business both in East Napa County and the Napa Valley. Commenter notes the obstacles facing businesses in East Napa include lack of supplies, services, and appropriate zoning. See Response 119-1 P.

Response 119-8 P: Commenter notes that the proposed General Plan Update needs to recognize East Napa County issues and work to integrate solutions that will benefit communities and industries countywide (zoning, local power, unique identity). See Response 119-1 P. All areas of the unincorporated county have been addressed in the General Plan Update.

Response 119-9 P: Commenter requests that all bubbles follow parcel boundaries and that parcels partially included in bubbles be calculated in whole when determining bubble area. Commenter provides additional information regarding several areas in East Napa and providing information regarding issues and future visions for those areas. See Response 119-2 P.

Letter 120

From: Mark Joseph [<mailto:joseph1254@comcast.net>]
Sent: Friday, June 15, 2007 2:18 PM
To: 'Hillary Gitelman'
Cc: raymond.marcus@worldnet.att.net; 'Fran Lemos'; 'Penny Johnson'; 'Cori Badertscher'
Subject: Comments on the draft Napa County General Plan

Attached is a letter from The IMPACT 94503 Group, outlining its comments regarding the proposed Napa County General Plan. The Impact group consists of residents who are interested in the well-being of the American Canyon community.

120-1P

Please contact me if there are any problems opening the attachment. In addition to e-mail, I can be reached at (707) 334-5216.

Thank you for your time, and for the opportunity to participate in this process.

Mark Joseph, board member
The IMPACT 94503 Group

3.0 COMMENTS AND RESPONSES TO COMMENTS

THE IMPACT 94503 GROUP

Date: June 15, 2007

To: Hillary Gitelman, Napa County Planning Director
c/o: hgitelman@napacountygeneralplan.com

Re: Comments on the Napa County Draft General Plan

The IMPACT 94503 Group has reviewed portions of the draft General Plan, particularly as it relates to American Canyon. Some of our members have attended one or more of the public meetings scheduled by the County regarding the proposed revisions to the General Plan. The following comments reflect the consensus of the group, and are focused primarily on the issue of the City of American Canyon's pending Rural Urban Limit (RUL) Line. 120-2P

First, as a general principle, we believe it is best to work together to find common ground. Second, we support greater public input into the land use planning effort (in contrast to specific development applications). Third, we support (as we believe do most citizens of American Canyon) the Agricultural Preserve and the County's historic efforts to avoid over-urbanization of Napa. Of course, that support does not mean we wish to minimize the City of American Canyon's rights to develop and become a prosperous community. The limits to that growth should be driven by the physical terrain of the lands in question, and the resources and service capabilities of the jurisdiction(s) in question.

With these principles in mind, we support the following RUL Line for American Canyon. We encourage the draft Napa County General Plan be amended to reflect the following points:

1. On the eastern side, IMPACT supports using the Newell Extension (as it is currently configured and in the future, as it connects to Green Island Road) as the Eastern boundary, except for the High School site (which should be included in the City's boundary). Anything east of Newell Extension would negatively impact the hillsides and the visual corridor. It would most likely create environmental problems (such as soil erosion and storm runoff problems) and provide minimal economic value (if any) for the City. 120-3P
2. The Hess Vineyard parcels should be designated as Ag Preserve. The undeveloped land on the south end (adjacent to Green Island Road) could be redesignated for urban uses, consistent with the Owner's original intentions to build a winery and tourist destination site. If so, however, then the City's RUL Line should include that portion. The level of suspicion and mistrust between the City of American Canyon and the County regarding this particular parcel is so great that nothing short of placing the land under the protection of Measure J will save the vineyards that have been planted there (and that the City supported by negotiating water service for the site). 120-4P
3. The areas on the west side of the City (primarily lands that are publicly owned and will be protected with Open Space Easements) should be included in the City's RUL Line. These lands will never be developed for urban uses, but the City is in a better position financially to maintain and enhance these areas, for both environmental and passive recreational purposes. If and when the new Open Space District has the financial wherewithal to take over the maintenance of these lands, it may be appropriate to transfer responsibility to that District, but the lands should remain in the City's jurisdiction. 120-5P

3.0 COMMENTS AND RESPONSES TO COMMENTS

4. This leaves the contested industrial parcels north of the City's current boundary. This includes the land directly south and east of the Airport, and includes the parcels in the City's original Urban Limit Line. Although IMPACT supports annexing the lands into the City, it believes there may be a better way to resolve the conflict. That is, we propose that a Joint Powers Authority (JPA) be established between the City and the County, and that both jurisdictions would control the land use and revenues derived from the parcels. It would not be easy to craft such a JPA, but it certainly would be better in the long run. This option would ensure both sides exercised control over the land uses and shared in the revenues and service responsibilities. For example, the City and County's zoning elements would need to be integrated, but that could result in a superior set of rules than either side presently uses. The area could be included in an assessment district so that the City and County receive the full cost of providing services to the area (which could cost more than the taxes that would otherwise be generated). Even property owners would benefit, since they would no longer have to worry about whether their development proposal will become the fuse for the next lawsuit. | 120-6P

5. Once the RUL Line has been established, IMPACT supports the concept of requiring the voters to authorize any subsequent changes to the RUL Line, similar to the City of Napa. | 120-7P

We believe this proposal is in the best interests of the City of American Canyon, as well as the County. The joint planning concept could actually become a model program for other areas that are engaged in similar disputes. | 120-8P

We would be glad to meet with any representatives from the County to discuss this proposal in greater detail, or to clarify any of the points made. We can be reached at the e-mail addresses below.

Submitted by

Ray Marcus, President
IMPACT 94503 Group
raymond.marcus@worldnet.att.net

Mark Joseph, Board Member
IMPACT 94503 Group
Joseph1254@comcast.net

3.0 COMMENTS AND RESPONSES TO COMMENTS

- LETTER 120: MARK JOSEPH & RAY MARCUS, THE IMPACT 94503 GROUP, JUNE 15, 2007
- Response 120-1 P: Commenters provides a letter from The Impact 94503 group interested in the well-being of the American Canyon community. County staff appreciates the pride the group shows in their community and their input to this planning process.
- Response 120-2 P: Commenters state that it is best to work together to find common ground and support greater public input and the agricultural preserve, but the City should be able to develop and become prosperous as well. The commenter's statement associated with this issue is understood.
- Response 120-3 P: Commenters note that they support using the Newell Extension as the eastern boundary, except for the high school site. The Revised General Plan Update proposes an RUL for the City of American Canyon that is consistent with current negotiations between the City and the County. The proposed RUL would allow annexation of some parcels (and portions of some parcels) east of the proposed Newell Extension, but not above the 15% slope line.
- Response 120-4 P: Commenters note that the Hess Vineyard parcels should be designated as Ag Preserve. The Revised General Plan Update proposes that the Hess Vineyards be designated Agriculture, Watershed and Open Space (AWOS) north of Green Island Road, as suggested by the commenter.
- Response 120-5 P: Commenters note that the areas on the west side of the City should be included in the City's Rural Urban Limit (RUL), not for development purposes but because the City is better equipped to manage those sites for both environmental and recreational purposes. As stated above in Response 120-3 P, the Revised General Plan includes a proposed RUL that represents the current desires of the City and the County. The proposed RUL would not allow annexation of undeveloped (open space) parcels east of the City.
- Response 120-6 P: Commenters propose that a Joint Powers Authority be established between the City and County to control land use and revenue for industrial parcels north of the City's current boundary. The County appreciates the commenter's input on this issue; however it has declined to take this approach, choosing instead to negotiate a compromise agreement with the City. (See Revised General Plan Update Policy Ag/LU-130 and Responses 120-3 and 120-5 above.)
- Response 120-7 P: Commenters note that once the RUL is established, IMPACT supports the concept of requiring voters to authorize any subsequent changes to the RUL line similar to City of Napa. The commenter's statement associated with this issue is understood. Voter approval is one of the "deal points" being negotiated by the City and County, and is therefore reflected in Policy Ag/LU-130 in the Revised General Plan Update.
- Response 120-8 P: Commenters believe their proposal is in the best interest of both communities and could be a model program for other areas. The County appreciates the commenter's input on this topic.

Letter 121



NAPA GROUP
P.O. Box 644
Napa, CA 94559
www.redwood.sierraclub.org/napa

June 18, 2007

Attn: Patrick Lowe
Napa County Office of Conservation,
Development and Planning
1195 Third St., Ste 201
Napa, CA 94559

Re: Comments on the Napa County Draft General Plan (DGP) and Draft
Environmental Impact Report (DEIR)

Dear Mr. Lowe:

We greatly appreciate the effort and hours put in both by county staff and the steering committee to update the General Plan. We know there is still a great deal of work to do, and we are committed to working with staff and the committee to produce a plan that will guide the county safely through the upcoming decades, retaining the values that make Napa County a place in which we all feel privileged to live.

Our major points are that the General Plan should:

1. eliminate the urban bubbles in the County,
2. endorse making Measure J permanent,
3. take a proactive instead of a project-driven, reactive approach to conserving our resources, and
4. put plans in place to address both the impact of, and our contribution to, global warming.

These changes should occur against a backdrop in which the County is fully apprised of the extent to which our natural resources can sustain further development.

121-1E/P

1

3.0 COMMENTS AND RESPONSES TO COMMENTS

DRAFT GENERAL PLAN

We focus primarily on Agricultural Preservation and Land Use, Conservation of our Biological Resources, Water Supply and Global Warming, with some remarks on Circulation. Other organizations are submitting comments with which we concur on these or other elements. We may have additional comments in advance of the General Plan Update Steering Committee's consideration of the individual elements.

As an initial remark, the *Napa County General Plan Update Policy Location Matrix* includes more than 140 instances where goals or policies have been deleted from the DGP. Three alternate reasons are offered, it "may be addressed in different terms", "may have been completed" or "may no longer be needed." As there is no indication of which reason applies to the policy/goal in question it is difficult and sometimes impossible to make a reasonable determination if the language is indeed no longer important.

121-2P

As a secondary remark, the *Matrix* helps to highlight that many provisions in the current GP have been weakened in the DGP. We point out numerous such instances in our matrix below. Finally, we believe that the list of scenic roads should be re-incorporated into the General Plan. There is a substantial distinction between making a proposal to modify an ordinance and the more limited circumstances in which one can propose an amendment to the general plan. This important protection for our scenic values and community character should require a change to the general plan in order to delete a road from the list.

We have prepared a matrix that includes specific language recommendations along with the supporting reasons. In order to provide greater context, we include these additional remarks on particular topics.

Eliminate the Urban Bubbles

The *urban bubbles* on Napa County's Land Use Map were casually drawn and generally intended to indicate existing development. As we all know, they do not accurately reflect the underlying zoning and or existing development. Some agricultural land is within the bubbles, some commercial and residential land is outside the bubbles.

They are confusing, illogical, at odds with reality, and their usefulness to planning in Napa County is gone. Of even graver concern, they now represent the threat of development inconsistent with the policy of city-centered non-agricultural growth. For the sake of clarity and consistency with our growth policies, it is time for them to be eliminated.

121-3P

The General Plan has other areas of the county in which existing development is recognized in the text of the Plan, rather than being reflected on the Land Use Map. Similar text could be included regarding areas in which there were formerly urban bubbles to recognize existing commercial and residential zoning. We join other interests in Napa County in calling for the elimination of the so-called "urban bubbles".

Support for Making Measure J Permanent

121-4P

This goes without saying.

Proactive Approach to Resource Protection: Adopt the Management Recommendations in the Baseline Data Report

The policies that Napa has adopted to preserve agriculture, specifically the minimum parcel sizes, Measure J and our conservation regulations, have helped to preserve our natural resources for two decades. In this setting Napa has relied primarily upon a project-driven, reactive approach to resource protection. This is no longer adequate to protect our resources.

It has now been recognized and documented that, despite the limits on development, our biological resources are at risk. The Baseline Data Report has identified the biotic communities that are sensitive, the species of plants and wildlife that are in danger of becoming extinct, and the threats to our natural resources in every area of the county. It is particularly disturbing that the DGP ignores the management recommendations that were crafted to address these threats.

121-5E/P

As the DEIR points out, one of the objectives of the General Plan is to “provide for the use and protection of the County’s natural resources.” We cannot meet that objective by simply reacting to development proposals. If we are to protect Napa Valley and the rest of the county we must adopt a robust, proactive, landscape approach to caring for our natural resources.

Global Warming

We cannot afford to ignore the potential impact of global warming on Napa County. Dire predictions have already been made about the potential negative impact on wine growing regions. We can’t say if those predictions are accurate or not. But lack of certainty is no excuse for ignoring the threat. We need to assess the potential impact on Napa with the best available information, consider what our responsive policies should be, and continue to monitor and adjust policies as future data provides more clarity.

121-6P

And we also cannot shirk the responsibility to do what we can to lessen global warming, not just in our direct impact but in our attitude toward long-term sustainability and conservation of our natural resources.

We have a number of specific changes that we recommend in matrix form below. We begin with two topics where we believe fundamental changes are needed that are beyond the matrix approach.

3.0 COMMENTS AND RESPONSES TO COMMENTS

WATER SUPPLIES, RIPARIAN HABITAT RESTORATION AND ENDANGERED SPECIES RECOVERY

While the proposed Draft General Plan, depending on the alternative selected, uniformly attempts to continue conservation policies and support riparian habitat restoration, the Draft EIR does not provide justification for future growth outlined in any version of the DGP.

Future water supplies available for the cities cannot be guaranteed. All of the cities are net importers of water. There are three factors that may, and probably will, adversely affect availability of water: increased demand on the Central Valley Project from future statewide population growth, Endangered Species Act effects on water withdrawals and supplies, and climate change and/or drought conditions.

The DEIR and Baseline Data Report fall short in assessing groundwater supplies and fail to consider what effects a drought would have on those supplies. While some very good studies have been done in the past (Kunkel, etc.), and are cited, and while they provide some excellent baseline data, both the DEIR and BDR did not do any follow-up work to assess trend lines on the various groundwater basins in the County. To make the assumption that these supplies are adequate to support the existing population and land uses, plus increased populations and agricultural development, as contemplated, is unwarranted and illogical.

121-7E/P

Base flow data on most of the tributaries of the valley, with several exceptions, has not been presented. Base flows are directly related as an indicator of water tables, and thus an indicator of volume in groundwater basins. Again, this is a failure to fully assess available water supplies to support future projected growth.

While the GP touts the lofty goals of riparian habitat restoration and protection and recovery of anadromous fish, it fails to take into account that lowering of water tables directly affects stream flows, which in turn has the direct results of reducing available habitat (water) and presents a sometimes-insurmountable barrier to re-establishing riparian vegetation.

There are no mechanisms proffered to address both the Sediment and Pathogen TMDL's. The County needs to stop disagreeing with the findings of those studies and their own available data and work with community groups and resource agencies to move toward solutions that will secure our future.

Finally, increased population will contribute to air pollution, which means that more particulate contaminants will settle onto water, and ultimately be washed into streams during rainfall events. Further degrading water quality is hardly consistent with achieving suitable habitat for anadromous fish.

CIRCULATION

We have some specific recommendations on Circulation in our discussion/matrix on Global Warming. More generally, our position for some time has been that Napa County's plans for transportation lack vision, will provoke even more traffic, fail to protect the county from

121-8P

3.0 COMMENTS AND RESPONSES TO COMMENTS

growth-inducing impacts and are generally inadequate. As the DGP essentially adopts the detailed transportation plans that we have long believed fail to provide more than generic solutions, and that experience has shown will simply result in more traffic in Napa, we do not support the Circulation Element of the DGP. Rather than using the General Plan to endorse detailed transportation plans that are controversial and have already been rejected by the community, the DGP should adopt general policies that will help to guide transportation planning.

121-8P
cont'd

Finally, we join others in their concerns regarding inaccurate level of service determinations that understate the true state of traffic in Napa today, particularly in the up-Valley areas.

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In addition to the remarks above, other specific changes recommended for the general plan are included as a matrix beginning on the next page. We treat Global Warming as a separate topic. Discuss of this issue with its own matrix of suggestions follows.

3.0 COMMENTS AND RESPONSES TO COMMENTS

Location in Draft General Plan	RECOMMENDED LANGUAGE	JUSTIFICATION / NEED	
THE VISION			
Vision, p. 15: Napa County in 2030 will remain a world-famous grape-growing and wine-making region, with a viable and sustainable agricultural industry.	Napa County in 2030 will remain a world-famous grape-growing and wine-making region, <u>known for its sustainable agricultural practices.</u>	Napa has gone far to adopt sustainable practices from Green Certification to appellation-based stream/river stewardship groups. We should be proud of these developments, and we should elevate the profile of sustainability to ensure that information and awareness of such opportunities reach all Napa landowners. This Vision change is supported by recommended changes in policy below.	121-9P
Vision, p. 15: New non-agricultural development will continue to be focused in the incorporated cities and already developed areas.	New non-agricultural development will continue to be focused in the incorporated cities and already <u>urbanized</u> areas.	This language ("already developed areas") is a dramatic expansion of where development can occur. We should return to the current GP language. All references in the Vision to "already developed areas" should be reviewed for consistency.	121-10P
Vision, p. 20: Add new heading on biodiversity.	Napa County will be widely recognized for its extraordinarily high plant and wildlife biodiversity and policies to protect these and other natural resources. [text should be added for this heading, drawn from BDR]	Napa is now known to be a world-class biodiversity hot spot with 5 times the state average of rare, endangered or threatened species. In order to ensure continuing focus on maintaining biodiversity this should become an element in our Vision.	121-11P
Vision, p. 22: Napa County will respond to change and to internal and external factors in proactive ways, identifying issues before	Napa County will respond to change and to internal and external factors, <u>including to the threat of global warming, water</u>	The potential for global warming to impact agriculture has already been identified as a potentially global problem and an issue in	121-12P

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they become crises and developing innovative ways to respond.	sustainability and energy dependency, in proactive ways, identifying issues before they become crises and developing innovative ways to respond. [text should be added to reflect the changed heading]	particular for grape-growing areas. It is critically important that we stay on top of this issue on a continual basis.	121-12P Cont'd
AGRICULTURE			
Ag/LU Goal 3: Concentrate non-agricultural land uses in existing urbanized or developed areas.	Concentrate non-agricultural land uses in existing <u>incorporated cities and already urbanized areas.</u>	As noted above, this goal should return to the current GP language. All references in the DGP to "already developed areas" should be reviewed for consistency (e.g., Ag/LU Goals 20, 21, 23, etc.)	121-13P
New Ag/LU Goal: No current language	Avoid development that might lead to the establishment of additional incorporated cities or towns.	P. 26 states that "The incorporation of American Canyon in 1992 completed what is likely to be the last incorporation in the county." There are currently two projects which could potentially increase the population in two areas of the unincorporated county to a level higher than our smallest incorporated town. A goal is clearly needed to avoid the development of additional cities/towns.	121-14P
Policy AG/LU-2: The County defines "Agriculture" as the raising of crops, trees or livestock; the production and processing of agricultural products; and related marketing, sales and other accessory uses. Agriculture also includes farm management businesses	The County defines "Agriculture" as the raising of crops, trees or livestock; the production and processing of <u>primarily local</u> agricultural products; and related marketing, sales and other accessory uses. Agriculture also includes farm management businesses	In order to help preserve agricultural land, support activities should only county as ag if they involve local agricultural products.	121-15P

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3.0 COMMENTS AND RESPONSES TO COMMENTS

and agricultural employee housing.	and agricultural employee housing <u>that primarily serve local agriculture.</u>		121-15P cont'd
Policy Ag/LU-21: The County will enact and enforce regulations which will encourage the concentration of residential growth within the County's existing Cities and areas designated for urban uses on the Land Use Map.	The County will enact and enforce regulations <u>that will concentrate residential growth within the County's existing Cities and <u>already urbanized areas.</u></u>	Using the word concentrate already indicates that this is not absolute, using the word "encourage" is insufficient to protect ag and open space watershed lands. As we have discussed above, the urban bubbles on the Land Use Map should be eliminated. The phrase <i>already urbanized areas</i> should be defined to include areas where there is residential, commercial, and industrial zoning in close proximity to an incorporated city.	121-16P
Residential Land Uses Policy Ag/LU-28 <ul style="list-style-type: none"> Actions to allow production of second units in all areas of the unincorporated county as appropriate. 	Actions to allow production of second units in all areas of the unincorporated county under the following conditions: [add conditions and an action item to adopt an ordinance establishing the conditions.]	Conditions should be established in the GP so the public knows how extensive this development will be. Such units may not be acceptable everywhere.	121-17P
Policy Ag/LU-29: . . . In addition, the County will accept responsibility for meeting its fair share of the housing needs, <i>including a predominant percentage generated by any new employment in unincorporated areas.</i>	The County will accept its responsibility to provide low and moderate cost housing in proportion to the number of low and moderate income householders in Napa County.	The cities have traditionally housed those who work in the County. We should not be taking on obligations to increase housing in the unincorporated parts of the County.	121-18P
Policy Ag/LU-37: The properties known as the "Hess Vineyards" shall remain in agricultural zoning but shall be reserved for industrial uses to meet the county's long term need for industrial space. Prior to rezoning these lands for non-agricultural uses, the County shall make a specific finding that no	The properties known as the "Hess Vineyards" shall be designated as Agricultural Preserve.	Hess Vineyards should stay designated as land for agricultural use. If there is inadequate land designated for industrial use, we should revisit the alternatives to determine how to decrease the demand for such use.	121-19P

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other suitable industrial land is available in the unincorporated area. The 230-acre Hess Vineyard site is located on the east side of Highway 29, north of the city of American Canyon and diagonally across from Green Island Industrial Park. The site is designated on the Land Use Map for Industrial uses, but is currently (2006) zoned agricultural and is in use as a vineyard.			121-19P Cont'd
Policy Ag/LU-47: The following standards shall apply to lands designated as Transitional on the Land Use Map of this General Plan. Intent: This designation provides for flexibility in the development of land, allowing either industrial, or commercial and residential uses. This designation is intended to be applied only to the Napa Pipe site and the Boca/Pacific Coast parcels in the unincorporated area south of the city of Napa, where sufficient infrastructure may be available to support this type of development. General Uses: All uses allowed in the Urban Residential, Commercial, and Industrial land use categories may be permitted. Minimum Parcel Size: Parcel sizes shall be as established for the Urban Residential, Commercial, and Industrial designations, depending on the use. Maximum Building Density: Maximum building intensity shall be determined through site-specific planning.	Text should be revised.	This text provides too little guidance as to what type of development can occur in such Transitional Use areas.	121-20P
Policy Ag/LU-53: The "urbanized" area of Angwin shown on the County's land use map shall contain institutional uses (i.e. the	All urban bubbles should be eliminated.	See discussion above. All other <i>Policies Specific to Geographic Areas of the County</i> relating to other areas should be reviewed for	121-21P

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3.0 COMMENTS AND RESPONSES TO COMMENTS

college), residential uses, and limited neighborhood-serving non-residential uses.		conformity.	121-21P Cont'd
Pope Valley	[No new urban bubbles should be created]		121-22P
<u>Policy Ag/LU-109</u> : With the proviso that no rights are absolute, that we will all best be served by striking a balance between private property rights and all our other rights and our other important community values, this General Plan nevertheless explicitly acknowledges that private ownership provides valuable incentives for the proper care of property and the environment, that preservation of property rights is an important cultural, economic, and community value, that protection of property rights is one of the primary and necessary functions of government at all levels, and that private property rights are therefore deserving of respect and consideration whenever land use decisions are made.	[delete]	We disagree vehemently with the introductory clause - the right to fresh air and clean water is indeed absolute, although there may be differing views on what constitutes <i>fresh</i> and <i>clean</i> . The General Plan should contain no statements that suggest Napa residents have only a qualified right to clean water and fresh air. What's more, elevating landowners over others is directly inconsistent with the very concept of environmental justice. In addition, the statement that private ownership provides valuable incentives for the proper care of property and the environment flies in the face of experience. Private land ownership has not kept pollution at bay. Napa should not be trying to develop new law and policies on this issue. It should be left to state and federal law.	121-23P
<u>Policy Ag/LU-120</u> : Certain multi-family residential project proposals, if they meet specific requirements, may—at the discretion of the Board of Supervisors—be allowed to exceed the annual building permit limits outlined in the Growth Management	[This text needs to be revised to establish some limits and conditions.]	The proposal to allow the Board of Supervisors to exceed the building permit limits in the Growth Management System has no upper limit on the annual number of permits. Additional conditions are needed to ensure that such discretion does not become	121-24P

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System. These requirements include, but are not limited to: Located in non-agriculturally designated lands; Are subject to a phased development plan; Would make a substantial contribution to meeting the County's State-mandated housing needs; and, Would include a significant affordable housing component.		the rule.	121-24P Cont'd
CONSERVATION			
p. 169-70 Natural Resources in Napa County ... This biota—or combination of the "flora and fauna" of the bio-community— provide real and measurable values to the county, not the least of which is an ecological cohesiveness that supports many social and economic functions including soil creation, erosion control, water quality enhancement, and natural beauty.	Add after paragraph quoted at left: Habitat destruction, fragmentation or conversion due to natural regime disturbance (flooding and fire), development, invasive species, overgrazing, hydrologic modifications, unnecessary fencing, removal of mature trees, environmentally harmful agricultural practices, disease and certain non-native pests all represent threats to the high level of biodiversity, sensitive biotic communities and special status species in the county.	The BDR has specifically identified numerous threats to our natural resources. These should be included at the end of the discussion of <i>Natural Resources in Napa County</i> so as to properly set the stage for the Natural Resources Goals and policies.	121-25P
Goal CON-3 : Protect the continued presence of special status species, including state- and federally recognized rare, threatened or endangered species and their habitats in a manner that is consistent with state and federal laws.	Protect the continued presence of special status species including <u>special status plants, special status wildlife, endemic species</u> , and their habitat and comply with all relevant state, federal <u>or local laws or regulations</u> .	As noted in the BDR, there are rare, threatened or endangered fish, wildlife, and plants in Napa County that may not persist in the County without special protection. The language in the DGP includes species listed under the federal or state endangered species acts but leaves out species that are endemic or determined to be rare under other auspices, such as the California Native Plant Protection Act. The BDR, which should remain the continual resource for this	121-26P

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		information, identifies and lists these species.	121-26P Cont'd
Goal CON-Y: No current language.	The County shall avoid development in areas where there are sensitive biotic communities and biotic communities of limited distribution. <i>Include in the GP maps from the BDR showing the locations of these habitats.</i>	There are 23 biotic communities in Napa County that have been designated by DFG as <i>sensitive</i> because of their rarity, high biological diversity, and/or susceptibility to disturbance or destruction. There are an additional 6 <i>biotic communities of limited distribution</i> which each encompass less than 500 acres in the County and are considered by local biological experts to be worth of conservation. All of these communities are listed and mapped in the BDR.	121-27P
Goal CON-Z: No current language.	The County will work to eliminate non-native invasive species.	Invasive species have been identified in the BDR as a threat to nearly all of our biotic communities. The magnitude of this threat warrants <i>Goal</i> level treatment. See related Policy CON-9 below.	121-28P
Goal CON-4: Conserve, protect, and improve plant, wildlife, and fishery habitats for all native species in Napa County.	Conserve, protect, and improve plant, wildlife, fishery habitats, and for all native species <u>in each of the thirteen evaluation areas</u> in Napa County. <i>Include in the GP the map from the BDR showing the locations of these evaluation areas.</i>	The 13 evaluation areas identified by the BDR represent distinct regions of the County. The BDR recommends that management of biological resources in each evaluation area should be tailored to the biological resources in that area and the threats to the resources.	121-29P
Goal CON-5: Provide for habitat connectivity and continuous habitat areas for wildlife	Protect connectivity and continuous habitat areas for wildlife movement; support public	Two major long-distance land-based wildlife corridors in Napa's Lake District - the Blue	121-30P

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movement.	<u>acquisition, conservation easements, and/or special accommodations (e.g., wildlife underpasses) to ensure protection of wildlife movement areas, particularly the three long-distance wildlife corridors in the County.</u> <i>Include in the GP the map from the BDR showing the wildlife corridors.</i>	Ridge-Berryessa natural Area East and the Blue Ridge-Berryessa Natural Area West - have been identified and mapped. Substantial portions of these corridors run through public land, but until action is taken to ensure that barriers are not constructed on private land the corridors will remain at risk. Public acquisition by a land management agency would help to ensure this protection. In addition, the Napa River is an important corridor for riparian associated birds, mammals, amphibians, and reptiles. Most of the Napa River flows through private land. Conservation easements and as appropriate, actions such as wildlife underpasses and the like should be supported to protect the ability of wildlife to move along this corridor.	121-30P Cont'd
Policy CON-4: The County will define and identify ecologically sensitive areas and will act to retain their values.	The County will enact and enforce regulations which will limit development in ecologically sensitive areas such as those adjacent to river or streamside areas, and physically hazardous areas such as floodplains, steep slopes, high fire risk areas and geologically hazardous areas; except for Oat Hill which is planned for urban development.	The draft text waters down the language in the current GP (the recommended language).	121-31P
Policy CON-5: The County will enact and enforce regulations, which will maintain or improve the current overall level of environmental quality found in Napa County.	The County will enact and enforce regulations, which will maintain or improve the current level of environmental quality found in Napa County.	The draft text waters down the language in the current GP (the recommended language) by referring to <i>overall</i> level of quality. This suggests that deterioration of quality in some areas is acceptable. This is inconsistent with the recommendation of the BDR that resources should be managed according to the specific resources and existing threats in the 13 evaluation areas.	121-32P

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<p><u>Policy CON-9:</u> The County shall <i>encourage</i> preservation and scientific study of special status species and sensitive biotic communities, and shall <i>encourage</i> removal of unwanted and invasive non-native species.</p> <p><u>Policy CON-26(d):</u> <i>Encourage</i> monitoring and active management where sensitive natural plant communities are threatened by the spread of invasive non-native species.</p> <p><u>MM 4.5.1c:</u> The County shall provide a policy in the General Plan that requires the development of a Noxious Weed Ordinance. The Noxious Weed Ordinance shall include regulatory standards for construction activities that occur adjacent to natural areas to inhibit the establishment of noxious weeds through accidental seed import.</p>	<p>Separate into two policies:</p> <p>Invasive species:</p> <p>The County shall work with local resource and land management agencies to develop a comprehensive approach to controlling the spread of non-native invasive species and reducing their extent on both public and private land, including development of a noxious-weed ordinance.</p> <p>Preservation and scientific study:</p> <p>The County shall encourage preservation and scientific study of special status species, sensitive and other biotic communities, <u>native species, and biodiversity.</u></p>	<p>Non-native invasive species are threatening nearly all of our biotic communities. Merely <i>encouraging</i> removal is inadequate.</p> <p>A Noxious Weed Ordinance is a good idea, but it must focus more broadly on the issue rather than just accidental seed import from construction adjacent to natural areas.</p> <p>Special status species and sensitive biotic communities are only one factor in biodiversity, which is the number and variety of species (special, sensitive or not) in a given area.</p>	121-33E/P
<p><u>Policy CON-X:</u> No current language.</p>	<p>The County shall support sustainable agricultural practices, private stewardship activities, and the formation and activities of volunteer stewardship groups in all three major watersheds, particularly appellation and steam, creek or river watershed-based organizations, by</p> <ol style="list-style-type: none"> supporting grant applications, facilitating access to data, and working to support increased landowner participation in sustainable practices and stewardship groups as needed. 	<p>This new policy commits the County to continue its existing support for sustainable agriculture and private stewardship. In addition, the County should work to improve landowner participation by tailoring its own level of support, i.e., if landowner participation in a creek's watershed is low, that should call for more active support from the County.</p>	

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<p><u>Policy CON-11:</u> Residential, commercial, industrial and recreational projects, wineries and new vineyards, and water development projects shall avoid impacts to fisheries and wildlife habitat to the maximum extent feasible.</p>	<p>Add:</p> <p><u>Action Item CON11.1:</u> The County shall adopt an ordinance requiring review of the impact on natural resources of development projects involving residences in excess of 5,000 ft² and mitigation of any impacts shall be required.</p> <p><u>Action Item CON11.2:</u> In order to enable complete consideration of impacts, including those that are cumulative, the County shall adopt an ordinance to address the practice of piecemeal development which avoids environmental review of the full project</p> <p><u>Action Item CON11.3:</u> The County shall adopt protocols to be followed, including buffers and setbacks where development is proposed on a parcel that contains sensitive biotic communities or biotic communities of limited distribution, including public notice of the development and steps taken to comply with the protocol.</p> <p><i>Include in the GP the map from the BDR showing the location of these communities.</i></p>	<p>Large estate homes with multiple-vehicle garages, guest homes, second units, pools, pool houses, drives, walkways, gardens, landscaping, and the clearing of vegetation for fire risk reduction purposes to 100 feet from all buildings can have a significant impact on the natural resources. The recommended language will ensure that impact is assessed and mitigations considered.</p> <p>The law requires that the complete project and any anticipated future development, be included in the review. This is often evaded by developing selected elements of a project prior to applying for a discretionary permit (building a large residence or fencing property prior to submitting a plan for vineyard conversion).</p>	121-35P
<p><u>Policy CON-12:</u> To address habitat conservation and connectivity:</p> <p>a) In sensitive domestic water supply drainages where new vineyard developments are required to retain between 40% and 60% of the existing vegetation on site, the vegetation selected for retention should be in areas designed to maximize habitat value and</p>	<p>Add:</p> <p>c) The County shall require that fencing of natural areas not inhibit or otherwise interfere with wildlife movement.</p> <p>d) The County shall develop a program to improve and continually update its database of wildlife information, including identifying</p>	<p><u>Fencing.</u> According to the BDR, habitat fragmentation represents one of the greatest threats to biodiversity and to species survival. Fragmentation occurs because of development, roads, conversion of wildlands and installation of fences that restrict wildlife movement.</p>	121-36P

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<p>connectivity.</p> <p>b) Outside of sensitive domestic water supply drainages, streamlined permitting procedures should be instituted for new vineyard projects that voluntarily retain valuable habitat and connectivity, including generous setbacks from streams and buffers around ecologically sensitive areas.</p>	<p>threats to wildlife habitat and barriers to movement.</p> <p>e) The County shall develop a program to protect and enhance our high level of wildlife biodiversity, particularly including sensitive wildlife species</p> <p><i>Include map from DEIR in the GP showing the wildlife corridors in Napa County.</i></p>	<p>The BDR concludes that there is going to be severe disruption of wildlife movement based on a model displaying full build-out under the existing General Plan policies.</p> <p>Under this language all future fencing regardless of whether the fencing is part of a discretionary review process, must be wildlife friendly if the area fenced is a natural area (not agriculture, a garden, a house, etc.)</p> <p><u>Database.</u> Wildlife data is considerably more difficult to collect than data on plants. Although there is extensive wildlife data and analysis in the BDR, it is also made clear that the data could be substantially improved. Such data will be critical if we are to protect wildlife in Napa County.</p>	<p>121-36P Cont'd</p>
<p><u>Policy CON-X:</u> No current language.</p>	<p>The County shall establish and continually update management plans tailored to the issues and threats to biological resources in each of the 13 evaluation areas, and shall use those plans to create programs to protect and enhance biological resources and to review development projects and craft appropriate mitigations to protect the existing level of biodiversity.</p>	<p>As noted above, the BDR recommends that management of biological resources be tailored to the different evaluation areas. Our commitment in Goal Con-2 to maintain the existing level of biodiversity needs an implementing policy.</p>	<p>121-37P</p>
<p><u>Policy CON-22:</u> Maintain and improve oak woodland habitat to provide for slope stabilization, soil protection, species diversity and wildlife habitat through the following measures:</p> <p>a) Preserve, to the maximum extent possible, oak trees and other significant vegetation that occur near the heads of drainages or</p>	<p>Add current GP language:</p> <p>Support hardwood cutting criteria that require adequate stands of oak trees for wildlife and slope stabilization, soil protection and soil production be left standing.</p> <p>Maintain to the fullest extent possible a</p>	<p>The recommended language weakens the current GP.</p> <p>Replacing old oaks with new oaks will not maintain the integrity of the oak woodland.</p>	<p>121-38P</p>

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<p>depressions on north facing slopes to maintain diversity of vegetation type and wildlife habitat as part of agricultural projects.</p> <p>b) Comply with the Oak Woodlands Preservation Act (PRC Section 21083.4) regarding oak woodland preservation to conserve the integrity and diversity of oak woodlands, and retain to the maximum extent feasible existing oak woodland and chaparral communities and other significant vegetation as part of residential, commercial and industrial approvals.</p> <p>c) Provide appropriate replacement native or adaptive vegetation, when retention of existing vegetation is found to be infeasible.</p>	<p>mixture of oak species which is needed to insure acorn production. Black, canyon, live and brewer Oaks as well as blue, white, scrub, and live oaks are common associations.</p> <p>Where possible, encourage preservation of remaining native Valley and Live Oaks. Where preservation is not possible, encourage appropriate replacement.</p>		<p>121-38P Cont'd</p>
<p><u>Policy CON-26:</u> Preserve and protect native grasslands, serpentine grasslands, mixed serpentine chaparral, and other sensitive natural plant communities recognized by CA Department of Fish and Game through a variety of appropriate measures, including:</p> <p>a) Prevent removal or disturbance of sensitive natural plant communities that contain special status plant species or provide critical habitat to special status animal species.</p> <p>b) In other areas, avoid disturbances to or removal of sensitive natural plant communities and mitigate potentially significant impacts to the extent feasible where avoidance is not achievable.</p> <p>c) Promote protection from overgrazing and</p>	<p>Preserve and protect <u>biotic communities of limited distribution</u> and native grasslands, serpentine grasslands, mixed serpentine chaparral, and other <u>sensitive natural plant communities</u> recognized by CA Department of Fish and Game through a variety of appropriate measures, including:</p> <p>a) Prevent removal or disturbance of sensitive natural plant communities that contain special status plant species or provide critical habitat to special status animal species.</p> <p>b) In other areas, avoid disturbances to or removal of limited distribution biotic communities or sensitive natural plant communities and mitigate potentially significant impacts to the extent feasible where avoidance is not achievable, such</p>	<p>The DEIR proposes to mitigate the loss of farmland by requiring long-term preservation of equal acreage within the County. Sensitive biotic communities should be treated similarly.</p>	<p>121-39E/P</p>

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<p>other destructive activities.</p> <p>d) Encourage monitoring and active management where sensitive natural plant communities are threatened by the spread of invasive non-native species.</p>	<p><u>mitigation to include long term preservation of equal acreage that includes such communities, preferably onsite but at a minimum within the County.</u></p> <p>c) Promote protection from overgrazing and other destructive activities.</p> <p>d) <u>Require</u> monitoring and active management where <u>biotic communities of limited distribution</u> or sensitive natural plant communities are threatened by the spread of invasive non-native species.</p> <p><i>Include maps from BDR illustrating where these communities are in the County.</i></p>		<p>121-39E/P Cont'd</p>
<p>Goal CON-10: Continue to collect information about the status of the county's surface and groundwater resources to provide for improved forecasting of future supplies and effective management of the resources.</p>	<p>The County will initiate studies to develop a comprehensive understanding of the potentials and deficiencies of surface and underground water supplies in Napa County.</p>	<p>The text should not be changed from the current general plan (recommended language from GP 3.14 Water Supply). This information should be presented in the DEIR to assist in updating the GP.</p>	

GLOBAL WARMING

Global warming is an established fact. Quantifiable effects are already accruing and will inevitably increase with time. While the extent and type of the effects of global warming are highly uncertain, they are sure to be complex, widespread, and potentially highly disruptive to human activities and to other species. Scientific consensus is building that the emission of carbon dioxide into the atmosphere by fossil-fuel burning is the major cause propelling global climate change.

The interests of the residents of Napa County as well as State law require that county general plans address global warming comprehensively. Adding impetus to this requirement is the news that the Attorney General of the State of California (AG) has initiated legal proceedings against San Bernardino County for failing to address global warming in its general plan update. Mr. Brown is bringing his lawsuit under CEQA, citing AB 32, which targets overall reduction in California carbon dioxide emissions at 50 % by 2020. The AG has made known his intent to take action against any county that fails to address global warming in its general plan update.

The DEIR addresses Global Warming under the Air Quality Component (Section 4.8)

MM 4.8.7a The County shall include a policy in the General Plan that requires the County to conduct a greenhouse gas emission inventory analysis of all major emission sources by the year 2008 in a manner consistent with Assembly Bill 32, and then to seek reductions such that emissions are equivalent to year 1990 levels by the year 2020.

The correlating statement in the Draft General Plan Update appears in the Conservation Element Introduction (p. 180)

Because Napa County is primarily rural, the amount of greenhouse gases generated is small compared to the other counties in the Bay Area, and miniscule in statewide or global terms. However, like all other areas worldwide that contribute to global warming, Napa County will be affected by climate change and shares a responsibility to address this issue. These efforts will focus on reductions in the two major sources of greenhouse gases in the county: the use of energy derived from the burning of fossil fuels, and the use of fossil fuels in motor vehicles”....

In Section 4.8 the DEIR estimates the effects of GHG (greenhouse gas) emissions projected under the general plan update.

Impact 4.8.7. Implementation of the proposed General Plan Update would contribute to an increase in Greenhouse Gas (GHG) emissions from vehicle transportation, building energy use and possibly agricultural operations and may contribute to increases in atmospheric GHG concentrations. Higher concentrations of GHGs have been linked to the phenomenon of climate change. (**Significant and Unavoidable – All Alternatives**)

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The DEIR repeats basically the same verbiage in section 5.0, concluding:

This impact would be **cumulatively considerable**.

The DEIR goes on to propose mitigations, MM 4.8.1a –d, which are summarized below. They apply to all of the alternative scenarios in the DEIR.

MM 4.8.1a provide incentives and opportunities for the use of energy-efficient forms of transportation such as public transit, carpooling, walking, and bicycling. This will include the provision and/or the extension of transit to urban areas where development densities (residential and nonresidential) would support transit use, as well as bus turnouts/access, bicycle lockers, and carpool/vanpool parking.

MM 4.8.1b support intergovernmental efforts directed at stringent tailpipe emissions standards and inspection and maintenance programs for all feasible vehicle classes and revisions to the Air Quality Attainment Plan to accelerate and strengthen market-based strategies...

MM 4.8.1c require(s) the evaluation of potential project-specific air quality impacts (based on the Bay Area Air Quality Management District’s CEQA Guidelines) of new development projects and will require appropriate design (e.g., provision of energy efficiency features in building design), construction (e.g., use of reduced emission construction equipment), operational features (e.g., provision of alternative forms of transportation and use of reduced emission vehicles and equipment), and/or participation in Bay Area Air Quality Management District air quality improvement programs to reduce emissions.

MM 4.8.1d all new County vehicles to conform with applicable emission standards at the time of purchase and throughout their use. The County will also purchase the lowest emitting vehicles commercially available to the maximum feasible to meet County vehicle needs.

The DEIR goes on to state, in Section 4.8, that these mitigation measures **will not be effective** in meeting the standards set by AB 32.

However, these mitigation measures are not expected to completely offset anticipated increases in vehicle miles traveled or air pollutant emissions from the three alternatives. Thus, this impact is considered **significant** and **unavoidable** for the proposed General Plan Update under all the alternatives.

In Section 5.0, the DEIR goes on to make the further claim that full mitigation is impossible.

While implementation of Mitigation Measure MM 4.8.7 and mitigation measures MM 4.8.1a through d would assist in reducing these emissions, there are no feasible mitigation measures to fully offset existing and future GHG emissions. Thus, this

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impact would be considered **significant and unavoidable**, and the project's contribution would be considered **considerable**.

The DEIR thus evaluates the draft general plan update as being out of compliance with AB 32.

Since every country in the world, including those with equivalent standards of living, has substantially lower GHG emissions than the USA, it is obviously not "unfeasible" to decrease our GHG emissions. It is possible to produce a General Plan update which meets the goals of AB 32.

Improving the General Plan's Approach to Global Warming

We recommend that the County incorporate global warming directives into the general plan under three broad headings

- **Active Information Gathering**: On-going monitoring of the latest scientific findings on global warming and ensuing State and Federal global warming mandates which will affect the County;
- **Coping with Challenges**: Adapting to the foreseeable effects of global warming on the County so as to preserve the natural environment, promote a healthy economy, avoid catastrophic loss of property, ensure a functioning infrastructure, and protect the health and safety of residents.
- **Decreasing Greenhouse Gas (GHG) Production**: Cutting the contribution of County government, commerce, residents and visitors to global warming by decreasing GHG emissions; maintain and increase the capacity of Napa County's woodlands and other ecosystems as carbon sequestors to recycle GHG.

In regards to these three broad areas of interest, the draft general plan contains no requirement for the first imperative – monitoring of current global warming science and legal mandates; it contains no directives for adapting to foreseeable effects of global warming on the county, and it contains only weak recommendations for decreasing GHG emissions.

We can and must do better.

Active Information Gathering

The specific effects of climate change in local areas are difficult to predict. For example, we don't know whether global warming will increase, decrease, or have no discernable effect on the total precipitation in Napa County. Therefore the most essential mandate of the General Plan must be on-going monitoring of the best scientific information on global warming, as well as close observation of local conditions.

Coping with Challenges: Effects of Climate Change on Napa County

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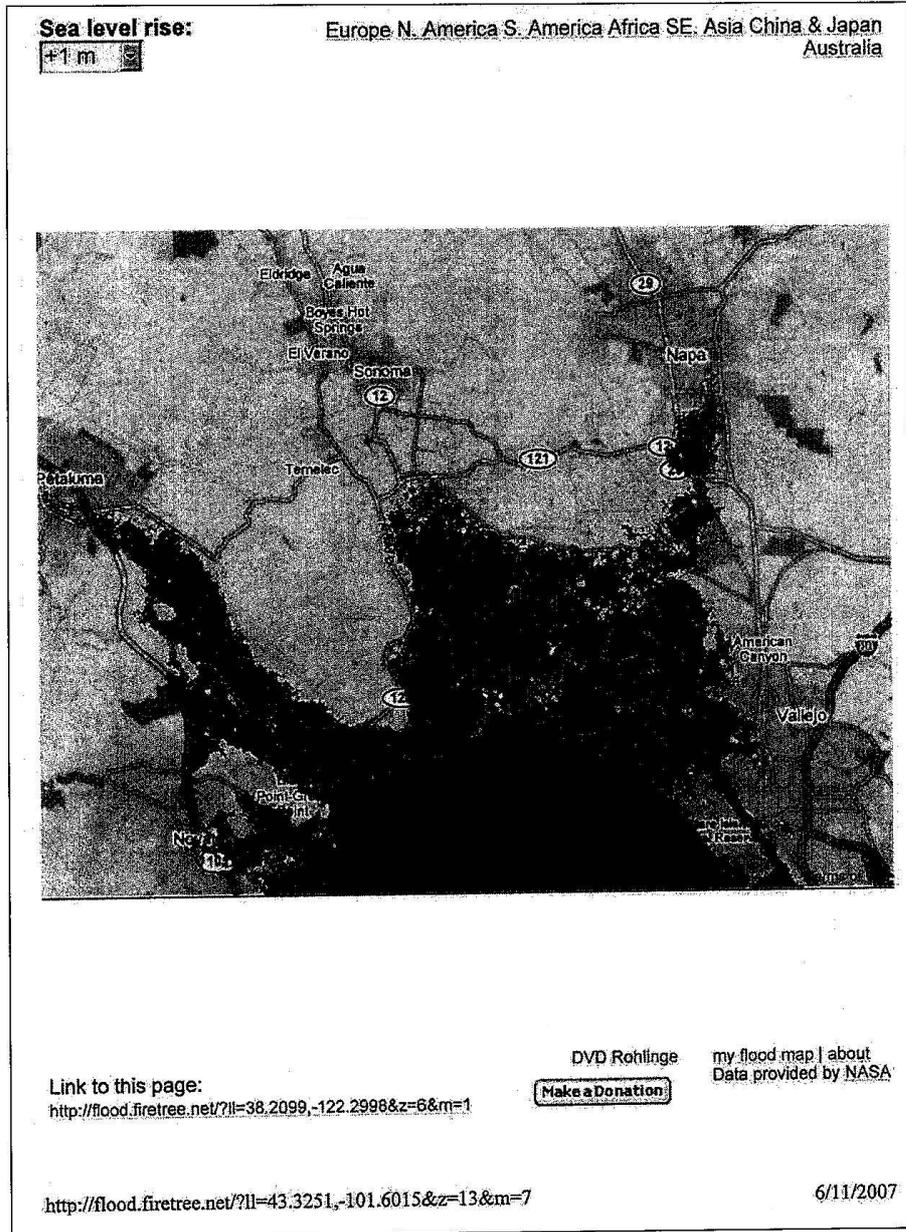
3.0 COMMENTS AND RESPONSES TO COMMENTS

The current general plan update draft contains NO analysis or response to the predicted effects of climate change on Napa County. This is a serious omission.

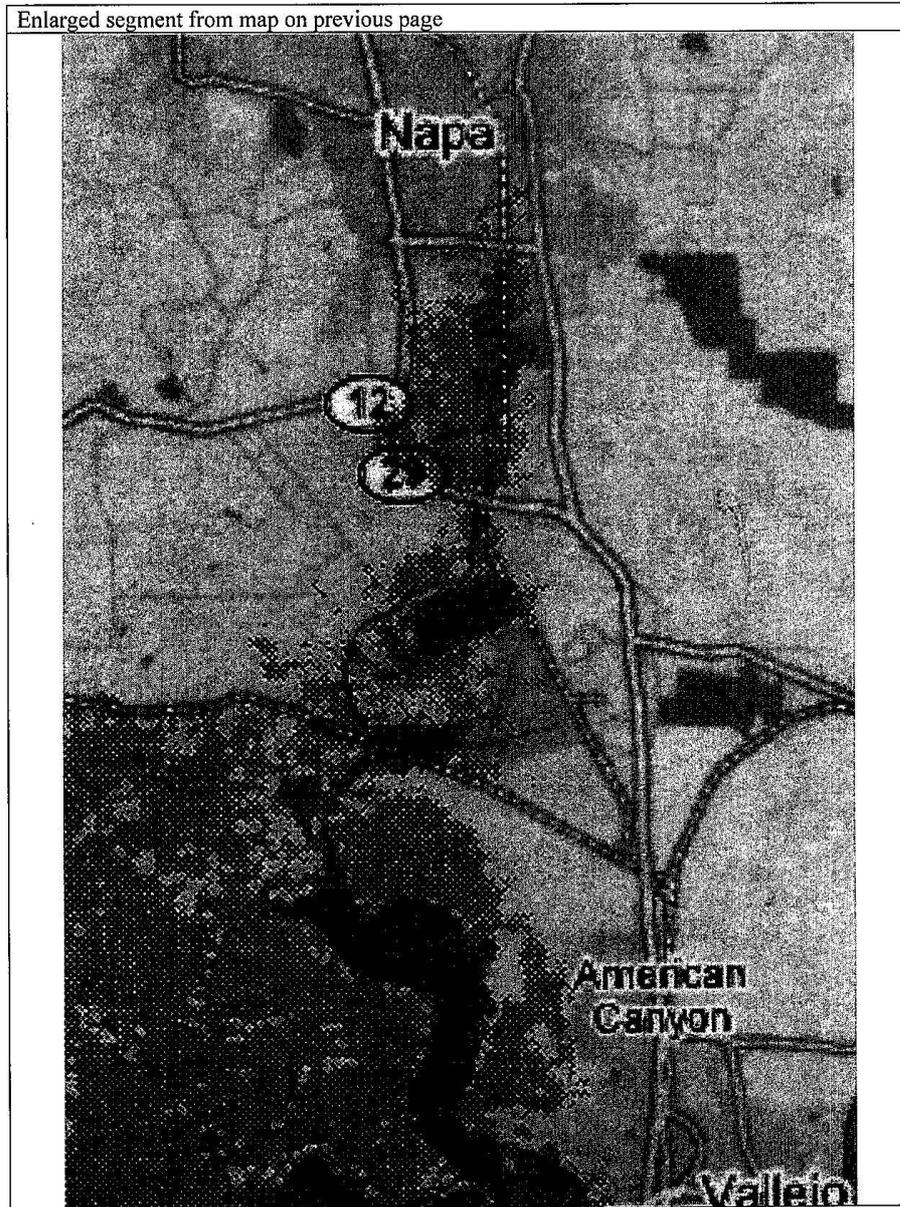
The State of California has established the California Climate Change Center under the auspices of the California Energy Commission's Public Interest Energy Research Program (PEIR) to acquire and disseminate the best available information on the effects of climate change on our state. Their mandate is to produce a biannual report. A summary of their current report, titled *Our Changing Climate: Assessing the Risks to California* is available at www.climatechange.ca.gov. Following is a review of some predictions of effects of climate change on Napa.

1. Sea Level Rise. The sea level has already risen. Specifically, the San Francisco Bay level has already risen by 8 inches, as measured at Fort Point (3). The sea level is expected to rise further, and the most recent observations by NASA of the Greenland Ice Cap show a faster-than-expected melting, which is one of the chief contributors to sea-level rise.
 - a. Expansion of San Pablo Bay, flooding southern Napa County. Many Napa residents are barely AWARE THAT THE SOUTHERN BOUNDARY OF NAPA IS A COASTLINE ALONG THE SAN PABLO BAY. A 60 CM sea level rise by the end of this century is consistent with conservative predictions (for example by the UN's Intergovernmental Panel on Climate Change (IPPC). The attached maps (next two pages), taken from the website www.flood.firetree.net, show a one-meter sea-level rise imposed on a Napa County map. (We could not locate any maps depicting a 60 cm rise). The map shows a substantial expansion of San Pablo Bay into the current territory of Napa County. Future decision-making will involve to what extent we should attempt to protect land areas with such measures as levees.
 - b. Salt-water incursion into groundwater. Sea level rise has the potential for salt-water incursion into the groundwater of the Carneros and less extensive areas east of the southern Napa River. This has potential for higher soil salinity degrading the Carneros area as prime grape-producing land, as well as diminishing valuable groundwater supplies currently used for agriculture and rural residences and businesses. Furthermore, if such salt-water incursion is in progress, depletion of fresh ground water by pumping for human use, would create a vacuum-like effect sucking in even more salt water.
2. Hotter summers. The moderate-to-high range of temperature rise predicted could result in 100 more days annually in which temperatures rise above 95 degrees in Sacramento. The California Climate Change Center admits the possibility that by the end of the 21st Century summer temperature rise may make all but the coolest counties (Mendocino and

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Cont'd



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Monterey) unsuitable for premium grape growing. Local conditions may vary. For example, it is possible that rising temperatures in the Central Valley could increase the pull of cool and foggy marine air through the Carquinez Strait, mitigating summer temperature rise in Napa Valley. Loss of the grape industry and the tourism it generates would have a devastating impact on the culture and economy of his county.

3. More extreme weather events. Models of warmer climate predict an increase in extreme weather events including storms, floods, and heat waves. Storm-related problems include flooding, landslides, acceleration of erosion, and disruption of power, communication, and transportation. Heat waves threaten the health of frail populations, including the elderly, the very young, and the chronically ill. The number of heat-related deaths could more than double in major urban areas.

We are adjacent to the Delta, whose aging levee system and growing population makes it more vulnerable than Napa to a large-scale flooding disaster, perhaps on the level of Hurricane Katrina.

4. More wildfires. The wildfire season is already about 2 months longer than in the 1970's. Future wildfires could increase by as much as 55 %, causing potential for millions more in property loss, cost to government for fire-fighting, and loss of life.
5. Decrease in the Sierra snowpack, and increase in number and intensity of drought years. In a worst-case scenario, the Sierra snowpack could decrease by 70 to 90 percent, resulting in severe disruption to water supplies statewide. Local precipitation effects are highly uncertain, but could include an increase in the number and severity of drought years.

121-41E/P
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Decreasing Greenhouse Gas (GHG) Production.

The draft general plan acknowledges the state mandate of AB 32 on page 210

Policy CON-60: Following the state's lead (specifically AB32 adopted in 2006), the County shall calculate its 1990 level of greenhouse gas emissions due to electricity use and other major sources by the end of 2008, and shall seek to achieve this level of emissions by the year 2020.

However, this policy is backed up only by sparse directives in the rest of the document. The GP update lays out a course of increasing population with meager efforts at energy conservation and alternatives to fossil fuel. This path will give us vastly more, rather than less GHG emissions by 2020.

THE GENERAL PLAN DRAFT DODGES THE SPECIFICS OF HOW TO ACHIEVE THE GHG EMISSION REDUCTION. IT CAN'T BE CALLED A GREENHOUSE GAS PLAN AT ALL. TO TRANSFORM THIS INTO AN EFFECTIVE PLAN REQUIRES THE SELECTION OF KEY

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OBJECTIVES, REQUIREMENTS FOR ANALYZING BASELINES, NUMERIC TARGETS, AND ASSIGNMENT OF THE APPROPRIATE COUNTY DEPARTMENTS TO DEVELOP PLANS AND MONITOR PROGRESS TOWARD EACH GOAL.

121-41E/P
Cont'd

Transportation and Greenhouse Gas Emissions

The Draft GP predicts that between 2003 and 2030 the number of daily vehicle trips generated within Napa County will increase by 58% from 36,000 to 57,000. It estimates the average daily miles traveled to rise to 228 % of 2003 levels, from 196,000 to 446,000 miles. These estimates are not consistent with the stated goal of decreasing GHG emissions.

The GP estimates that 87% of Napaans commute to work by private auto. The GP refers to the dominance of the auto for resident and visitor transportation as a "choice". However, the inadequacy of the local public transit system, and the poor connectivity of the county with regional transit systems make use of public transit systems impractical for most purposes. For shorter journeys, the pedestrian or bicyclist discovers that few concessions have been made for their needs. Where they exist, sidewalks and bike lanes have a disconcerting way of suddenly disappearing, forcing the walker or pedeler out into the traffic. Whether for short or long journeys the automobile is a necessity for most Napaans rather than a "choice".

Our current county transportation planning effort still envisions the private automobile as the centerpiece of the transportation system, devoting minimal resources to improve our public transit and non-motorized modalities. This general plan update makes no attempt to dethrone the automobile. Significant reduction in transportation-related GHG emissions requires making public transit and non-motorized transportation (bicycles and walking) preferred alternatives over the private automobile.

121-42E/P

Napa County has many of the elements in place for an efficient multi-modal transportation system. Our population is centered in a few urban areas. The bulk of our traffic moves along a few well-defined thoroughfares. We have rail lines, a coastline and a navigable river which in the past were effective transportation routes for people and cargo. Only the political will is needed to effect a transformation of our county transportation system, which could become a model and the envy of the rest of the country.

Buildings' Sources of Greenhouse Gases

According to the general plan draft, electrical & natural gas usage in Napa County is concentrated in residential uses, at around 50%, with commercial usage comprising an additional 30%. The report further states that use of these energy sources has been increasing at an average rate of 2.4 % annually. Thus, the stationary energy use is increasing at twice the rate of the population. The EIR scenarios project even greater rates of future population growth.

Napa County has the potential for development of alternative energy sources in solar, wind, and geothermal as well as waste recovery. Examples of local energy generation already in place include Monticello Dam (hydroelectric), American Canyon Power Plant (landfill waste

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to gas), and Soscol Water Recycling Facility (methane conversion). The report states that 70 solar projects have been approved in Napa County but does not provide an estimate of how much energy these are generating.

We have barely begun to tap our potential in alternative energy. As technology advances and production ramps up, costs are rapidly declining. Investment in clean energy and in energy conservation will result in substantial savings in the coming years.

Carbon Sequestration

No discussion is found in the GP draft of the value of Napa County ecosystems as carbon sequestration assets.

Global Warming Conclusion. The recommendations we make in this document by no means exhaust the potential of the General Plan to address the problem of global warming. Certainly professionals in the field who are sincerely committed to management of the threat of global warming would be able to develop a solid comprehensive plan that could be a national model.

A matrix of recommended changes relating to Global Warming begins on the next page.

121-42E/P
Cont'd

3.0 COMMENTS AND RESPONSES TO COMMENTS

LOCATION IN DRAFT GENERAL PLAN	RECOMMENDED LANGUAGE	JUSTIFICATION/NEED	
Agricultural Preservation and Land Use Element			
Add Ag/LU policy	On-going evaluation of productivity of grape crop in relation to climate change, with provision for aggressive investigation of alternative economic endeavors for Napa county should it become necessary; These should favor continuing emphasis on agricultural production as the chief county economic activity.	Some experts predict that rising temperatures will make Napa County unsuitable for premium grape production by the end of the century.(1,3) Loss of this capacity would be devastating for the economy of the county.	121-43P
Add Ag/LU policy	Encourage state support of research into warm-weather grape varieties and production techniques.	As above.	121-44P
Restore current Land Use Goal 2 to Draft Ag/LU goals	To develop and implement a set of planning policies which combine to define a population size, rate of population growth, and the geographic distribution of that population in such a manner that the desired quality of life is maintained.	GHG emissions reduction The draft DEIR scenarios predict a rate of growth higher than the 1% restriction of Measure A. Higher growth rates will impair ability to meet state mandated GHG emissions reductions.	121-45E/P
Circulation Element			
CIR Goal 3: The County's Transportation system shall encompass the use of private vehicles, transit, para-transit, walking, bicycling, air travel, rail, and water	Add: County policies shall be directed toward decreasing GHG emissions by encouraging increased use of non-motorized modalities	The Draft GP predicts more than doubling of daily vehicle miles traveled in Napa County during	121-46E/P

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transport.	(walking and bicycling), more efficient use of automobiles (carpooling, van pools), improving the public transit system, increasing the average efficiency of gas-powered vehicles, and switching to cleaner fuels such as bio-fuels and electricity.	the life of the plan. Only by reversing this trend, and elevating public transit and non-motorized transit to preference over the private automobile can we hope to decrease GHG emissions.	121-46E/P Cont'd
Policy Cir 3-2: Increase the attractiveness & use of energy-efficient forms of transportation....	Attach specific targets to this goal, for example how much to increase the use of energy efficient forms of transportation.	Policy is meaningless without specific targets to measure success.	121-47P
Objective Cir 3.1: Increase the number of miles of on-street bicycle lanes and routes by "x" miles	Needs specific number of miles inserted		121-48P
Action Cir 3.4.1: Work with major employers and NCTPA to offer incentives for carpooling & the use of cost-efficient ground transportation alternatives to the private automobile.	Set specific target for carpooling or shift to public or non-motorized transportation for private employers.	Policy is meaningless without specific targets to measure success.	121-49P
Policy Cir 3-5: County of Napa shall demonstrate leadership in the implementation of programs encouraging the use of alternative modes of transportation by its employees example programs may include preferential carpool parking, flexible working hours, a purchasing program that favors hybrid, electric or other non-gasoline vehicles, secure bicycle parking, transit incentives;	Add telecommuting as an option where consistent with job duties	Telecommuting is an increasingly popular option, which aside from decreasing traffic is popular with employees who have children or other reasons which make working from home attractive.	121-50P
Policy Cir 3.6: The County shall encourage the use of public transportation by tourists and visitors & will work with	Add targets for percentages of tourists using public transit, or for reduction in tourist miles in Napa traveled in private	Policy is meaningless without specific targets to measure success	121-51P

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winceries to encourage the use of these options and the development private mass transit	vehicles.		121-51P Cont'd
<u>Policy Cir 3.7:</u> All developments along fixed transit routes "should" provide amenities designed to encourage carpooling, bicycle and transit use	Change to "should" to "shall"	Word change would strengthen this policy.	121-52P
<u>Policy Cir 3.8:</u> Pedestrian & bicycle access "should" be integrated into all parking lots....	Change to "should" to "shall"	Word change would strengthen this policy.	121-53P
<u>Policy Cir 3-10:</u> Where sufficient right of way is available, bicycle lanes should be added to county roadways when repaving or upgrading of the roadway occurs.	Add " the County shall enter into discussions with Cal Trans to implement the same directive for State roadways within the County."	Extending this policy to State highways would add to the benefits accrued, increasing the "seamlessness" of the county transportation system.	121-54P
No current Policy statement	<u>Add Policy supporting Cir Goal 3</u> Set target caps to limit the average number of vehicle miles traveled daily within the County	Meeting GHG state mandates. It will take strong pressure to reverse the trend of increasing auto use.	121-55P
No current Policy statement	<u>Add Policy supporting Cir Goal 3</u> Develop effective connections between Napa public transit and regional transportation networks (BART, Baylink ferry, airports, etc) via rail, bus, and/or ferry to serve the needs of local residents, commuters, and visitors.	Lack of connectivity between Napa and regional transit systems is a major factor causing high way congestion, as well as impairing quality of life for those who don't drive.	121-56P

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No current Policy statement	<u>Add Policy supporting Cir Goal 3</u> Support infrastructure developments to encourage the use of biofuels, hydrogen, or electrical –powered vehicles, e.g. re-fueling stations, if and when these technologies become economically feasible.	Meeting GHG state mandates. A major factor limiting implementation of electric car and other technology is lack of infrastructure, such as refueling stations.	121-56E/P Cont'd
Conservation Element			
No current equivalent goal	<u>Add Goal</u> The County Conservation and Planning Department prepare at least biannually a report containing at a minimum: <ul style="list-style-type: none"> • a summary of the most current scientific findings on the state of global warming • analysis of state and federal mandates related to climate change • description of promising technological developments which may be useful to decreasing County GHG emissions and to adapting to the effects of climate change • report of climate change effects observed in Napa County • review of success in meeting County targets for greenhouse gas emission reduction and adaptation to change 	Global Warming. This is perhaps the single most important action for the county to implement on climate change. The effects of global warming on our county could potentially be disastrous. Or they could be relatively minimal. The current state of knowledge is highly imprecise. The gravity of the threat requires a unified rather than a piecemeal approach by County government. However our climate future evolves, the County is best-served by keeping abreast of the most up-to-date information.	121-57E/P

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Open Space Conservation Goal			
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.			
No current policy language	<u>Add Policy supporting Goal CON 1</u> Require that long-range planning and project evaluation allow for migration of wetlands northward as the current wetlands are flooded by rising Bay waters	Sea -Level rise of 60 cm by end of century, as predicted by IPCC report (2) would flood much of current wetlands. These lands serve many functions, from storm buffers, to water cleansing, to wildlife habitat. We need to provide for future wetlands.	121-58E/P
Natural Resources Goals			
	<u>Add Goal to Natural Resources</u> Preserve and enhance the value of Napa County's plant life as carbon sequestration systems to recycle greenhouse gases. There should be no net decrease in carbon sequestration function in Napa County	Greenhouse Gas Control Plant life provides important mitigation of GHG emissions, one that in the future may even have monetary value, e.g. in carbon trading systems	121-59E/P
No current equivalent policy	<u>Add Policy to support new goal above</u> Study Napa's natural, agricultural and urban ecosystems to determine their current value as carbon sequestrators and how they may potentially be increased.	Necessary for implementation of above goal.	121-60E/P
	<u>Add Policy to support new goal above</u>	GHG effects of human activities	121-61E/P

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No current equivalent policy	Require detrimental effects on carbon sequestration to be determined and documented in applications for new projects.	include not just production of GHG's but diminished capacity for GHG recycling	121-61E/P Cont'd
Water Quality, Water Use & Water Conservation Goals			
Goal CON 6: Reduce or eliminate groundwater and surface water contamination from known sources....			
No current policy language	<u>Add Policy to support Goal CON 6</u> As sea level rises, monitor for salt-water incursion into southern Napa County aquifers. Evaluate for effects on crops and groundwater. Recommend such remedial action as may be necessary, including decreasing the amount of allowed groundwater withdrawals.	Global Warming. UN IPCC report (2) predicts about 60 cm rise in sea level, which would expand the San Pablo Bay into the Carneros region.	121-62E/P
Goal CON 8: Promote the responsible use of water in order to conserve supplies and ensure an adequate supply of water for future generations.			
No current policy language	<u>Add Policy supporting Goal Con 8</u> The potential combination of decrease in Sierra snow pack with increase in drought years should intensify countywide efforts at water conservation, recycling of treated water, careful monitoring and stewardship of groundwater, and search for alternative water sources such as Baywater desalination.	Global Warming. Every city in Napa County is a net water importer. Likely huge decreases in the Sierra Snowpack (1) will make the water supplies for the cities increasingly precarious.	121-63E/P
No current policy language	<u>Add Policy supporting Goal Con 8</u> Participate in regional efforts to manage potential disruptions in water supply from Sierra snowpack.	As above.	121-64E/P

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Energy Policies			
<p>Policy CON-57: The County shall quantify increases in locally generated energy between 2000 and 2010, and at that time consider establishment of a numeric target for 2030.</p>	<p>Revise: "and at that time establish annual numeric targets for local production of "clean" (minimal GHG producing) energy by renewable sources, including solar, wind, biofuels, waste, and geothermal"</p>	<p>Strengthen policy by requiring targets, and setting them as annual, rather than 20 years in the future; clarify policy by specifying that the local energy produced must be from "clean" renewable sources..</p>	121-65E/P
<p>Policy CON-58: Seek to reduce the energy impacts from new residential and commercial projects by applying Title 24 energy standards as required by law and provide information to the public and builders on available energy conservation techniques, products and workshops.</p>	<p>Require that development project proposals incorporate a GHG emissions assessment the EIR. This should include fuel needs generated by building heating, cooling, lighting systems, etc; fuel needs of any manufacturing or commercial activities on the premises; GHG emissions produced by the traffic expected to be generated by the project, and any loss of natural ecosystems carbon sequestration capacities which caused by the project.</p>	<p>GHG Emission goals. As we strive to meet state mandated decreases in GHG emissions, we must avoid additional burdens added by development.</p>	121-66E/P
<p>Policy CON-61 The County shall promote and encourage "green building" and sustainable development through achievement of Leadership in Energy and Environmental Design standards (LEED) standards set by the US Green Building Council.</p> <p>Actions in support of this policy "<u>may include</u>": auditing current practices in municipal service depts. to assess opportunities and barriers to implementation of sustainable practices;</p>	<p>Change "may include" to "must at a minimum include"</p>	<p>This policy should be strengthened.</p>	121-67P

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<p>amending the County Code as necessary to eliminate barriers to "green" construction developing new County buildings as "green buildings" utilizing sustainable construction and building practices</p>			121-67P Cont'd
Economic Development Element			
Goal E-2: Develop and promote a diversity of business opportunities			
<p>No equivalent policy.</p>	<p><u>Add Policy Supporting Goal E-2</u> Decrease transportation costs of goods by encouraging production of food for local consumption farmers' markets and other venues for the sale of locally produced food and other goods purchase of locally produced food and other products by County agencies.</p>	<p>Local production and consumption of goods both decreases transportation costs (including GHG production) and increases local economic diversity.</p>	121-68E/P
Safety Element			
<p>Safety Goal 1: Safety considerations will be part of the County's education, outreach, planning, and operations in order to reduce loss of life, injuries, damage to property and economic and social dislocation resulting from fire, flood, geologic and other hazards.</p>			121-69E/P
<p>No equivalent policy language</p>	<p>Add Policy supporting Safety Goal 1 Participate with regional agencies in planning emergency response for evacuation and shelter of large numbers of Delta residents in the event of catastrophic flooding.</p>	<p>Sea level rise combined with subsidence of Delta land and an aging levee system, raise the risk of a Katrina level disaster, which will require a regional response. (1)</p>	
<p>Safety Goal 2: To the extent reasonable, protect residents and businesses in the unincorporated area from hazards created by earthquakes, landslides, and other geologic hazards</p>			121-70E/P
<p>Policy SAF 3: (Lists safety hazards to be</p>	<p>Add the potential for sea level rise to the</p>	<p>Predicted sea level rise of approx</p>	

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included when considering General Plan Amendments, re-zonings or other project approvals]	list of environmental hazards to be considered.	60 cm (2) over the next 90 years would subject substantial land in Napa to flooding potential, with costs to the county of disaster response.	121-70E/P Cont'd
Safety Goal 3: Recognizing that Napa County is an environment in which fire is a part of the natural processes in the county's wild areas, protect homes and businesses from fire and wildfire and minimize potential losses			121-71E/P
No current policy language	<u>Add Policy supporting Safety Goal 3</u> Coordinate with CDF and neighboring counties in plans to meet the need for more intensive fire prevention and response	Global warming. Predictions of possible 55 % increase in California wildfires. (1)	
No current policy language	<u>Add Policy supporting Safety Goal 3</u> Evaluate projects proposals in rural areas for their projected cost to the county for additional fire protection services.	As above. Full costs to infrastructure of rural development must be calculated.	121-72P
Safety Goal 4: To protect residents and businesses from hazards caused by flooding			
No current policy language	<u>Add Policy supporting Safety Goal 4</u> Work with USGS, SF Bay Conservation & Development commission & other agencies that operate monitoring stations to track the rise in Bay and ocean water levels.	Projected sea level rise of approx 60 cm over next century (2). However, much uncertainty involved, and Napa planning functions will require most up-to-date information.	121-73E/P
No current policy language	<u>Add Policy supporting Safety Goal 4</u> Require long-range infrastructure planning in areas including transportation, water and sewage management, and utility facilities to take into account the effects of sea-level rise.	Planning ahead could avoid millions in losses due to flood damage.	121-74E/P
No current policy language	<u>Add Policy supporting Safety Goal 4</u> Participate in regional planning groups to	As above. Example: long sections of highway 37 could be threatened	121-75E/P

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	manage infrastructure response to rising sea waters.	with flooding, forcing a choice of raising the roadway or protecting it with levees, vs. directing heavier east-west traffic flows northward to the highway 12 Napa-Sonoma route.	121-75E/P Cont'd
Safety Goal 6: The County will be able to respond in the event of a disaster to protect residents and businesses from further harm and begin reconstruction as soon as reasonable.			121-76E/P
No current policy	<u>Add Policy supporting SAF Goal 6</u> Develop response strategies to cope with increasing storm events, flooding and landslides.	Global warming. Prediction of increasing extreme weather events.	
Policy SAF-42: Mental health concepts and programs..... to the extent that the County is aware of special needs populations requiring special assistance following a disaster, responders should be aware of these populations and implement programs to reach out to these persons.	<u>Add Policy supporting Safety Goal 6,</u> separate from Policy Saf-42. County Health and Human Services Department to work with cities, EMS responders and others to devise a plan to identify frail individuals, alert them during weather emergencies (heat waves, storms, and floods), and mobilize resources to transport and shelter them or provide other assistance as needed.	Addressing the needs of frail populations does not really fall under mental health programs, which is the subject of policy SAF-42, which is why a new policy should be added. The policy should be strengthened by requiring that the county proactively identify these people, rather than the verbiage "to the extent that the County is aware of". Pre-disaster identification of special-needs people will increase the efficiency of disaster response, decreasing the risk of injury and death. <u>Heat-related illness and death</u> of frail people, including elderly are projected to increase with global warming. Interventions such as congregate shelters with air	121-77E/P

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		conditioning can be used to save lives. San Jose is an example of one locality which is instituting a congregate "cooling shelter" plan.	121-77E/P Cont'd
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3.0 COMMENTS AND RESPONSES TO COMMENTS

DRAFT ENVIRONMENTAL IMPACT REPORT

See comments above regarding *Water Supplies, Riparian Habitat Restoration And Endangered Species Recovery and Circulation*.

121-78E

First of all, there are additional development projects that have not been acknowledged in this draft, including plans relating to St. Helena hospital, Aetna Springs, and plans for development of estate homes in the Pope Valley area, as well as plans for the Guenoc Winery that will impact Pope Valley.

AGRICULTURE

The estimates in Impact 4.1.1 and 4.1.2 (loss of farmland) of acreage potentially converted from farmland under the three alternatives are understated due to:

- the exclusion of the impact of single-family housing development (see our discussion below in connection with biological resources regarding the erroneous conclusion that the impact of such development is “extremely small”. We assume residential development has also been excluded from the analysis on farmland conversion).
- the exclusion of supporting uses (p. 4.1-23). That 15 acres of allowed impervious surfaces per winery is “locally considered part of agriculture” does not change the fact that it is a conversion of farmland.
- the exclusion of farm management operations. It is noted that a new ordinance allows such uses on agricultural land, but it is unclear if this newly allowed use has been factored into the analysis in terms of potential acres of farmland converted.
- the exclusion of second units (p.4.1-25). It is concluded that the development of second units would have a less than significant impact on the conversion of farmlands. It is not entirely clear, but we assume that this means it has not been considered a factor in determining the acres potentially converted. We also note that while the limitations on second units in terms of size are included, there is no supporting estimate of how many total acres such developments would impact or how many second units could be constructed. The fact that one such second unit may be small in size is irrelevant if the cumulative impact is significant.

121-79E

In addition to understating the impact, the mitigation proposed will not lessen even the impact acknowledged to less than significant. While attempting to reduce farmland conversion through evaluating development projects is a good goal (MM 4.1.1a) and one that we support, reductions “where feasible” are unlikely to result in the protection of much farmland. Such a requirement can be easily avoided by defining the project to necessarily include development of the farmland. In any event, no estimate of the impact of this mitigation in terms of reduced farm acres converted is offered.

While we strongly support MM 4.1.1b, it is also not likely to result in a *reduction* of conversions. This mitigation can be met by putting farmland that is at no risk of conversion under a conservation easement. The supposition that this mitigation will reduce future farmland

121-80E

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conversions at the cost of allowing conversions now is speculative at best. In any event, there is no estimate of the impact of this mitigation in terms of reduced farm acres converted.

Finally, that 17,593 acres of farmland have been gained over the last general plan period is irrelevant. The forecast for an additional 10,000 – 12,500 acres of vineyard development is relevant. However, there is no estimate of how many of those acres would be categorized as prime, unique or of statewide importance as opposed to farmland of local importance which is not analyzed in terms of the mitigation. What's more, as the mitigation seems likely to have little ability to reduce the number of acres converted, the math indicates that farmland converted could reduce the anticipated new acreage of farmland from 10,000 – 12,000 acres to as low as 3,200 acres. A reduction in potential new vineyard acreage in favor of retaining watershed land as natural areas would be a benefit. Reduction in favor of development is not. While there will still be a net increase in the amount of farmland, without the conversions to development the increase would have been larger. As an agricultural county, it is this figure that is relevant.

121-80E
Cont'd

For these reasons, further mitigation is called for to reduce the amount of land converted from agriculture. We refer to our discussion on the DGP regarding eliminating the urban bubbles as a means of reducing the potential for farmland conversion.

With respect to Impact 4.1.4 regarding conflicts with existing agricultural zoning, it is claimed that all alternatives will result in an impact that is significant and unavoidable because there is no feasible mitigation. This conclusion underscores the need for an alternative that lessens the impact, such as one including the elimination of urban bubbles.

121-81E

LAND USE

Potential incorporation/annexation. We begin by noting that there are proposals outstanding for Angwin and Napa Pipe that could potentially create populations in excess of those of Yountville, the smallest incorporated town in the County. The EIR should assess the potential impact of both developments, including the potential for either or both areas to incorporate and the likely consequences of such incorporation, and an alternative with respect to the latter area – that of being annexed by the City of Napa.

121-82E

Incomplete/incorrect regulatory framework. The Regulatory Framework (§4.2.2) section discusses Local, Regional, and Federal regulatory agencies but fails to include State agencies, notably the California Dept. of Fish and Game which owns more than 20,000 acres of land in the County and California State Parks. In addition, the Federal discussion does not include the Bureau of Reclamation which owns more than 28,000 acres of land in the County, including a 19,000 acre lake. The discussion of the Bureau of Land Management (BLM) needs to be updated (the proposed resource management plan has now been adopted and Cedar Roughs is now a federally designated Wilderness). The final paragraph in the BLM discussion is so confused we are unable to provide corrections; BLM management areas appear to be conflated with BDR evaluation areas and the acreages seem to be all over the place.

121-83E

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BIOLOGICAL RESOURCES

In brief, we believe the draft EIR (DEIR) is deficient in a number of areas including the:

- lack of reasonable alternatives,
- failure to quantify and analyze the impact on biodiversity,
- failure to develop a baseline for invasive species and to factor in their growth in analyzing the impact on biological resources,
- failure to assess the impact of mansion development, and
- erroneous conclusions regarding the impact on wildlife.

121-84E

Due to these various deficiencies, the DEIR's assessment of impacts are in some cases incomplete and/or inadequate and we are unable to form a reasoned, independent judgment on the impact of the draft General Plan and the effectiveness of the proposed mitigations.

Lack of a reasonable range of alternatives. An EIR must describe a reasonable range of alternatives that could feasibly obtain the project objectives while avoiding or lessening any of the significant impacts. With respect to the impact on biological resources (and some of the other topics) no such range of alternatives is presented. Regardless of which alternative is analyzed the impact on biological resources is the same. Even Alternative D – alleged to be the most protective of our resources – has the same impact as all the others. This is disconcerting as the impact on sensitive biotic communities is determined to be significant and unavoidable under every alternative. What's more, as we have noted, other impacts are understated and in part, because of this, the mitigations are unlikely to reduce impacts to less than significant. We cannot identify what trade-offs should be made to decrease impacts because no such trade-offs are presented.

121-85E

We note here that our discussion on the DGP essentially presents an alternative that should be included and analyzed in the DEIR and that we believe would reduce impacts on biological resources. This alternative eliminates the urban bubbles and adopts a proactive rather than project-driven, reactive approach to protection of our natural resources.

Failure to quantify and analyze biodiversity. As acknowledged by the DGP, Napa County is a "world-class biodiversity hot spot." The DGP states that the County will "maintain the existing level of biodiversity" (Goal CON-2) but the DEIR fails to quantify the level of biodiversity or discuss the extent to which it will be reduced by the development contemplated in the DGP. While assessment and analysis is presented with respect to special status species and sensitive biotic communities, these are only two factors in biodiversity, which is the number and variety of organisms found within a specified geographic region, regardless of whether they are special status or sensitive.

121-86E

Biodiversity has been the object of data collection and study in Napa County by national and local conservation organizations. Indeed, information is available regarding relative levels of biodiversity on a parcel-level basis. The fact and the degree to which biodiversity will be lessened must be presented if the public and the steering committee are to reasonably assess the impact of the alternatives.

Invasive species. No baseline data is presented in the EIR regarding the presence of non-native invasive species, nor is their presence and anticipated growth factored into the analysis on biological resources, despite the fact that “non-native species are a threat to nearly all of the biotic communities in the County” (BDR, p.4-77). Consequently, impacts on biological resources are misleading as they fail to acknowledge losses due to spreading invasive species.

121-87E

While we support the proposed mitigation (4.5.1c) to adopt a noxious weed ordinance to establish standards for construction adjacent to natural areas in order to avoid “accidental seed import” such an ordinance will have no impact on invasive species that are already here.

Failure to assess the impact of mansion development. The DEIR erroneously assumes that the impact of single-family home development will be “extremely small” and consequently fails to assess its impact. Instead, it notes that the construction of single-family homes, along with other non-discretionary approvals, could increase the impact of development but concludes –

Minimum parcel sizes in the unincorporated Country would remain so large (40-160 acres) under all alternatives, however, that the contribution from these developments would not only be geographically diffuse, they would be extremely small. (DEIR p. 4.5-49)

No data is presented to support this supposition, other than the minimum parcel sizes and the presumption that each home will be built on a parcel of either 40 or 160 acres.

It is well known that Napa County is a popular locale for large mansions, often for those whose main residence may be elsewhere. It is not unusual for these homes to be in excess of 5,000 square feet with multi-vehicle garages, guest houses, second units, pools, pool houses, decks, patios, walkways, roads, drives, fences, gardens and landscaping, and often, the family vineyard. The impact on biological resources is increased by the requirement to clear vegetation 100 feet from all buildings, and often the thinning of the surrounding forest, in order to reduce fire risk. Given the number of rare, endangered and threatened plant and wildlife species in Napa County, it is not reasonable to assume that even one such development has no impact, let alone assuming a negligible cumulative impact. Even setting aside the size of the development, the risk of fragmenting substantial habitat or blocking a critical wildlife corridor is substantial.

121-88E

In addition, the assumption made that all single-family homes are being developed on parcels that meet the minimum parcel size is inconsistent with other data presented. Over the five year period from 1999 to 2004 there were 300 residential building permits involving 5,393 acres (DEIR p. 4.2-9) for an average of 17.98 acres per home, well below the parcel minimums for agricultural zoning. At this rate, the next 30 years would bring 1800 residential building permits involving 30,000 acres.

In short, the assumption that residential development in the county will have an extremely small impact is inconsistent with the trend toward mansion development and the data indicating that residential development is occurring on lots much smaller than the minimum parcel size.

As a result of not assessing the impact of residential construction, the acreages indicated as being impacted by development under the alternatives are understated and conclusions regarding the impact on biological resources are invalid.

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Wildlife. While the above discussion applies to all the impacts discussed, there are additional deficiencies in the discussion regarding *Loss of Wildlife Movement and Plant Dispersal Opportunities*.

The DEIR identifies three long-distance wildlife corridors (p. 4.5-33), but fails to identify the extent to which corridors in adjacent counties that are in close proximity (shown on Figure 4.5-6) extend into Napa County. In some cases wildlife corridors appear to lead into Napa, but no information is provided on whether Napa provides important habitat or movement areas for wildlife using those corridors.

Conclusions regarding the impact on wildlife are generally incomplete and understate the impact. The DEIR anticipates that there will be a significant impact on sensitive biotic communities. Yet the impact on special-status wildlife and wildlife movement areas is determined to be less than significant with mitigation (we discuss the inadequacy of the mitigations below). As special-status wildlife species utilize every biotic community in Napa (BDR, p. 4-46), it is highly unlikely that a significant impact on sensitive biotic communities can translate into a less than significant impact on the wildlife that uses them.

In addition to the logical inconsistency discussed above, conclusions that impacts on special-status wildlife and wildlife movement can be reduced to “less than significant” is not credible given the threats to biological resources identified in the BDR that are not addressed by the DGP. For example, the BDR states that “without special protection”, various species of fish, wildlife, and plants that are “rare, threatened or endangered, may not persist in the County” (BDR, p. 4-43). As the DGP fails to provide any significant additional protection beyond the current ordinances and general plan policies that the BDR took into account, one can only conclude that as predicted, some of those special-status species will become locally extinct. Add to this prediction the additional development that the DGP will allow and the conclusion that there will be a significant impact on special-status wildlife is inescapable.

121-89E

This is particularly true as the continued development of large single-family homes presents a substantial risk of habitat fragmentation. Habitat fragmentation is cited by the BDR as one of the greatest threats to biodiversity and thus to species survival (BDR, p. 4-46).

Furthermore, development in a number of the evaluation areas is expected to impact wildlife species “unless allowances are made for their movement requirements” (e.g., BDR p. 4-49). Again, as the DGP does little to improve upon the existing protections one can only assume that these impacts will occur and with the increased development allowed under the DGP, they will worsen.

Evidence of equal concern is contained in BDR Figure 4-19 (next page), depicting a full build-out scenario for purposes of assessing the impact on wildlife movement. The full build-out scenario would result in “severe disruption of wildlife movement” in the Western Mountains



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and Eastern Mountains evaluation areas (BDR p. 4-51). While the assumed full build-out won't occur within the time period for which the DGP is planned, this is full build-out without the additional development in the DGP. If we know our policies will result in severe impacts on wildlife in the future, we need to address the problem now. The DGP fails to do so in an effective manner. The DEIR findings of less than significant impact with mitigation is not consistent with BDR conclusions. See discussion on mitigation below.

For the above reasons, the impacts on wildlife are understated. What's more, the impacts will not be reduced to less than significant by the proposed mitigation. The mitigation to retain movement corridors does not apply to the development of estate homes, and appears to be limited to the major wildlife corridors, despite recognition that wildlife movement areas can be much smaller in size. The requirement that fencing only be allowed around individual vineyard blocks is beneficial, but again, it does not apply to non-discretionary projects or to the known practice of fencing a parcel first, before applying for a permit to develop a vineyard.

Based on the evidence as discussed above, the impact on wildlife will be substantial and the mitigations proposed inadequate to reduce that impact to less than significant. We refer to our comments on the DGP for additional actions that could be taken to lessen the impacts on biological resources.

121-89E
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Napa's Development Tipping Point

A critical failure of the EIR is to determine the maximum tolerance of Napa County for further development. Maintenance of natural areas in our watersheds is critical to support the development of soils, erosion control, seed dispersal, and water quality and supply, all of which are necessary to support agriculture in Napa County and in particular Napa Valley. As more and more habitat is converted to development we approach a tipping point where our remaining natural resources are inadequate to sustain themselves, let alone support local agriculture.

Discussions a few years ago between the Napa Sierra Club and numerous members of the agricultural community led to the common view that a program EIR should be initiated that would establish how much more development, including vineyard conversion, Napa could sustain. County staff was approached and it was agreed that such an EIR would be prepared. Unfortunately, the DEIR does not comply with that agreement. While assessing the impact of various levels of development and population growth, it fails to make the determination regarding how much more cumulative development impact the County can absorb.

The failure to determine the maximum level of sustainable development before it is reached means that one day degradation of the resources will shift from being described as *inevitable* to the realization that it is simply *too late* to stop the damage. And after that it is a question of limiting the degree of future degradation. This is what occurred at Lake Tahoe. Robert H. Twiss stated in 2004 in *Planning and Land Regulation at Lake Tahoe: Five Decades of Experience*:

Lake Tahoe also presents a case study for mop-up planning. At Tahoe, as in many other places, no comprehensive plan was adopted until after the region's environmental capacities were seriously over-committed. Thus, the main thrust of planning and regulation has not been one of

121-90E

forward-looking, clean-slate visioning, but rather one of trying to pick up the pieces and undo the damage caused by flawed decisions. Mop-up planning is characteristic of virtually all of the world's ecosystem restoration efforts.
http://www.law.berkeley.edu/students/curricularprograms/envirolaw/selected_pprs/twiss_planning.pdf

Given our agricultural focus that relies upon the natural resources to sustain us, Napa cannot afford an ecosystem collapse. Are we close to one? We don't know. That is the point. Once the tipping point is reached there is no going back. Our salvation lies in determining where that point is before we reach it.

It is feasible to determine how many more acres can safely be developed. Napa County should live up to the agreement that this was the approach we would take. We call on the county to engage in the analysis they agreed upon and to include that analysis as part of the DEIR.

* * *

The General Plan is the last time for more than two decades to take a comprehensive look at planning for the County. It is worth whatever time and effort it takes to get it right.

Sincerely,



Elisabeth Frater
Chair of the Executive Committee

121-90E
Cont'd

3.0 COMMENTS AND RESPONSES TO COMMENTS

LETTER 121: ELISABETH FRATER, SIERRA CLUB, NAPA GROUP, JUNE 18, 2007

Response 121-1 E/P: Commenter notes major points of concern for the General Plan:

- 1) Eliminate urban bubbles
- 2) Endorse making Measure J permanent
- 3) Have a pro-active instead of project-driven approach to conserving resources.
- 4) Put plans in place to address impact of global warming.

In regard to the elimination of the designated “bubbles,” County staff believes that elimination of all of the bubbles would be infeasible for reasons articulated in the Alternatives Master Response 3.4.2. Nonetheless, the Revised General Plan Update would reduce the size of two “bubbles” (Angwin and Berryessa Estates) and commit the County to systematically reviewing and revising the remaining bubbles in the coming years (Action Item Ag/LU-114.1).

Regarding making Measure J permanent, the Revised General Plan Update acknowledges the provisions of Measure J and supports its extension (see Policy Ag/LU-110). The actual extension of Measure J would require voter approval.

Since release of the public draft of the proposed General Plan Update and the Draft EIR, the Conservation Element has been further refined and includes additional policy provisions associated with the preservation of the County’s natural resources. The commenter is referred to the Water Supply Master Response 3.4.1 and Biological Resources Master Response 3.4.3, for further details regarding changes to the Conservation Element. In addition, the Conservation and Circulation Element now both include additional provisions to further address climate change.

The commenter is referred to the Climate Change Master Response 3.4.4 for further details on additional policy provisions that address climate change.

Response 121-2 P: Commenter states that their comments are focused on the Agricultural Preservation and Land Use Element and the Conservation Element and notes that they concur with other organizations’ comments on the proposed General Plan Update. In addition, the commenter suggests that the proposed General Plan Update results in a weakening of the current General Plan provisions. The commenter’s specific comments are responded to below. With changes incorporated into the Revised General Plan Update, County staff disagrees that the protective provisions of the existing General Plan would be weakened. As an example, the Revised General Plan Update would include a map of roadways subject to the County’s Viewshed Ordinance, as requested by the commenter.

Response 121-3 P: Commenter suggests elimination of the currently designated urban “bubbles” and substitution of text recognizing existing development. As explained in Alternatives Master Response 3.4.2, County staff believes that elimination of all of the bubbles would result in a plan that does not

3.0 COMMENTS AND RESPONSES TO COMMENTS

comply with state law (CGC Section 65302(a)) and would make it infeasible for the County to maintain a certified Housing Element as required by law. Nonetheless, the Revised General Plan Update would remove areas currently zoned for agricultural use from two of the "bubbles" (Angwin and Berryessa Estates), and commit the County to a future planning process addressing the remaining 10 "bubbles."

Response 121-4 P: Commenter asks for support to make Measure J permanent. Regarding making Measure J permanent, the proposed General Plan Update Agricultural Preservation and Land Use Element acknowledges the provisions of Measure J and supports its extension in Policy Ag/LU-110. Actual extension of Measure J would require voter approval.

Response 121-5 E/P: Commenter asks for a proactive approach to resource protection and the adoption of the management recommendations in the Baseline Data Report (BDR). The BDR was designed primarily to document the existing setting of Napa County by providing data that indicates the current state up to the time the document was published. The intent of the BDR was to be a "dynamic" database, which was to be updated as new information was known. The commenter is referred to Biological Resources Master Response 3.4.3 regarding the consideration of the BDR associated with the proposed General Plan Update and Draft EIR as well as to additional policy provisions regarding protection and preservation of natural resources in the County in the revised Conservation Element. The Draft EIR examines biological impacts and discloses potential level of impact, providing mitigation measures to reduce all but one impact to a level of less than significant. The vast majority of those mitigation measures have now been incorporated into the Revised General Plan Update.

Response 121-6 P: Commenter notes that we cannot afford to ignore the potential impact of global warming on Napa County. The commenter is referred to Climate Change Master Response 3.4.4 for further details on additional policy provisions that address climate change that are now included in the Conservation Element section on Climate Protection and Sustainable Practices for Environmental Health and to the Circulation Element of the revised General Plan Update.

Response 121-7 E/P: Commenter states that the Draft EIR and BDR fail to adequately consider water supply impacts (including water supplies of the cities from the State Water Project) and the associated impacts to groundwater resources and stream flows that could impact fisheries and riparian habitat. The commenter also notes concerns regarding water quality and air quality impacts. As noted in Water Supply Master Response 3.4.1, the Draft EIR does identify water supply impacts for the County (including the cities) as well as provides groundwater data (groundwater elevation data and impact analyses of potential changes to groundwater elevations and discharge to surface water features) and flow data for several County waterways. The environmental effects of increased groundwater usage on stream flows are addressed in the Draft EIR impacts 4.11.5, 4.11.6, 4.6.4, and 4.13.3.1, which include consideration of impacts to fisheries and their habitat (Impact 4.6.4). Water quality impacts (which are the subject of TMDL activities) are addressed under Impacts 4.11.1, 4.11.2, 4.11.3, 4.11.7

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and 4.11.8. Mitigation measures have been identified in the Draft EIR to address these impacts that have subsequently been incorporated into the Conservation Element of the revised General Plan Update. The purpose of the Draft EIR is to analyze and identify potential environmental effects, recommend mitigation measures, and disclose this information to the public and decision-makers. There is no requirement that an EIR justify future growth.

Response 121-8 P: Commenter has specific recommendations on circulation in their matrix as the County plans for transportation lack vision. This specific comment does not provide any detailed comments on the adequacy of the Circulation Element. However, it should be noted that since release of the public draft of the proposed General Plan Update and Draft EIR, the Circulation Element has been further refined and includes additional details and provisions for reducing vehicular traffic as well as expanded opportunities for alternate forms of transportation.

Response 121-9 P: Commenter requests that language be added to the Summary Vision of the General Plan on p. 15 as follows:

...region, known for its sustainable agricultural practices.

The Summary and Vision section has been substantially rewritten in response to comments, although this concept has been retained under the heading of Agricultural and Land Use in that section as well as in the Conservation Element. (See Policy CON-3 in the Revised General Plan Update for an example.)

Response 121-10 P: Commenter requests that language be added to the Summary Vision of the General Plan on p. 15 as follows:

...incorporated cities and already urbanized areas.

The Summary and Vision section has been substantially rewritten in response to comments, although the suggested terminology has been incorporated into various sections of the document where appropriate.

Response 121-11 P: Commenter requests that language be added to the Summary Vision of the General Plan on page 20 under a new heading on biodiversity as follows:

Napa County will be widely recognized for its extraordinarily high plant and wildlife biodiversity and policies to protect these and other natural resources.

The Summary and Vision section has been substantially rewritten in response to comments, although this text has been incorporated under the heading of Conservation and within the Conservation Element and related policies and action items.

Response 121-12 P: Commenter requests that language be added to the Summary Vision of the General Plan on p. 22 as follows:

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Napa County will respond to change and to internal and external forces, including to the threat of global warming, water sustainability and energy dependency.

The Summary and Vision section has been substantially rewritten in response to comments, although this concept is included in policies and action items within the Conservation Element.

Response 121-13 P: Commenter requests that the General Plan Ag/LU Element p. 33 be modified as follows:

Goal 3: Concentrate non-agricultural land uses in existing incorporated cities and already urbanized areas.

Goal Ag/LU-3 has been edited as follows in response to this comment. The number of this goal is now Ag/LU-2.

"Concentrate ~~non-agriculture urban uses~~ in the County's existing urbanized or developed cities and urbanized areas."

Response 121-14 P: Commenter requests a new goal for the Ag/LU Element as follows:

Avoid development that might lead to the establishment of additional incorporated cities or towns.

The County appreciates the commenter's input associated with this issue and has addressed this concern in Policy Ag/LU-131 of the Revised General Plan Update.

Response 121-15 P: Commenter requests that Ag/LU Element p. 34 be modified as follows:

Ag/LU-2: ...processing of primarily local agricultural products...housing that primarily serves local agriculture.

The County appreciates the commenter's input associated with this issue. The suggested changes were not incorporated into the Ag/LU Element; however County Code currently includes limits on products that may be processed at new wineries and other facilities (e.g., "the 75% rule").

Response 121-16 P: Commenter requests a change to Ag/LU Element p. 39 as follows:

Ag/LU-21: The County will enact and enforce regulations that will concentrate residential growth within the County's existing cities and already urbanized areas.

The edits have been made to replace the term "urban uses" with "urbanized areas." The number of this goal has been changed to Ag/LU-23.

Response 121-17 P: Commenter requests a change to Ag/LU Element p. 40 as follows:

Add conditions and an action item to adopt an ordinance establishing the conditions.

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The commenter's suggestion has been incorporated into the Revised General Plan Update as Action Item Ag/LU-30.1.

Response 121-18 P: Commenter requests a change to Ag/LU Element p. 41 as follows:

The County will accept its responsibility to provide low and moderate cost housing in proportion to the number of low and moderate income householders in Napa County.

The County appreciates the commenter's input associated with this issue and has attempted to address the concern in Policy Ag/LU-31.

Response 121-19 P: Commenter requests a change to Ag/LU Element p. 43 as follows:

The properties known as the Hess Vineyards shall be designated as Agricultural Preserve.

The Revised General Plan Update proposes that the Hess Vineyards be designated Agriculture, Watershed and Open Space (AWOS). See Policy Ag/LU-40.

Response 121-20 P: Commenter notes that Ag/LU Element Policy Ag/LU-47 on p. 43 text should be revised as it provides too little guidance. The proposed General Plan Update has been revised and now designates the Napa Pipe site as a Study Area that would require further study prior to consideration of non-industrial uses on the site.

Response 121-21 P: Commenter states that all urban bubble should be eliminated. The Preferred Plan would remove areas currently zoned for agricultural use from two of the "bubbles" (Angwin and Berryessa Estates), and commit the County to a future planning process addressing the remaining 10 "bubbles" (Action Item Ag/LU-114.1).

Response 121-22 P: Commenter notes that no new urban bubbles should be created (Pope Valley). In keeping with the commenter's suggestion, the Revised General Plan Update no longer includes a proposal to re-designate property in the Pope Valley area.

Response 121-23 P: Commenter states that Policy Ag/LU-109 should be deleted as the introductory clause is unacceptable as it suggests that Napa residents have only a qualified right to clean water and fresh air. County staff appreciates the commenter's input associated with this issue; however they have chosen to retain this policy and believes that the plan strikes an appropriate balance between private property rights and other issues.

Response 121-24 P: Commenter notes that Policy Ag/LU-120 should be revised to establish some limits and conditions. The Revised General Plan Update has eliminated the earlier Policy Ag/LU-120, which would have allowed multi-family residential projects to exceed annual building permit limits without a General Plan amendment.

Response 121-25 P: Commenter requests that text in Conservation Element p. 169-70 should be revised to include the following:

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Habitat destruction, fragmentation or conversion due to natural regime disturbance (flooding and fire), development, invasive species, overgrazing, hydrologic modifications, unnecessary fencing, removal of mature trees, environmentally harmful agricultural practices, disease and certain non-native pests all represent threats to the high level of biodiversity, sensitive biotic communities and special-status species in the county.

The Conservation Element Introduction has been revised to include this suggested edit.

Response 121-26 P: Commenter requests an addition to Goal CON-3 for the Conservation Element on p. 87 as follows:

Protect the continued presence of special-status species including, special-status plants, special-status wildlife, endemic species, and their habitat and comply with all relevant state, federal or local laws or regulations.

The comment is addressed under Goal CON-5. Goal CON-6 is intended to address species and habitats that are not exclusively "special status species" as defined by state and federal agencies.

Response 121-27 P: Commenter requests the addition of a new policy in the Conservation Element as follows:

The County shall avoid development in areas where there are sensitive biotic communities and biotic communities of limited distribution and include maps from the BDR showing locations of habitats.

Include in the GP maps from the BDR showing the locations of these habitats.

The Conservation Element has been revised to generally include this suggested edit under revised Policy CON-17(e).

Response 121-28 P: Commenter requests the addition of a policy in the Conservation Element as follows:

CON-Z: The County will work to eliminate non-native invasive species.

The Conservation Element has been revised to generally include this suggested edit under revised Policy CON-23 and CON-17.

Response 121-29 P: Commenter requests a change to Conservation Element Goal CON-4 as follows:

...all native species in each of the thirteen evaluation areas in Napa County. And include maps from the BDR.

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This specific requested edit was not made given that it would not allow appropriate flexibility in determining the appropriate geographic extent of a given study area based on the resource of concern.

Response 121-30 P: Commenter requests a change in the Conservation Element to Goal CON-5 as follows:

...wildlife movement; support public acquisition, conservation easements, and/or special accommodations (e.g., wildlife underpasses) to ensure protection of wildlife movement areas, particularly the three long-distance wildlife corridors in the County.

Include maps from the BDR on wildlife corridors.

The Conservation Element has been revised to generally include this suggested edit under revised Goal CON-18 and related action items.

Response 121-31 P: Commenter requests that Policy CON-4 be modified as follows:

The County will enact and enforce regulations which will limit development in ecologically sensitive areas such as those adjacent to river or streamside areas, and physically hazardous areas such as floodplains, steep slopes, high fire risk areas and geologically hazardous areas; except for Oat Hill which is planned for development.

The Conservation Element has been revised to generally include this suggested edit under revised Policy CON-7, with the exception of the reference to Oat Hill which is no longer in the County.

Response 121-32 P: Commenter requests that Conservation Element CON-5 be changed as follows:

The County will enact and enforce regulations, which will maintain or improve the current level of environmental quality found in Napa County.

The Conservation Element has been revised to generally include this suggested edit under CON-7.

Response 121-33 E/P: Commenter requests that Conservation Element Policy CON-9 and CON-26(d) be separated into two policies – one for invasive species and one for the Preservation and Scientific Study and a noxious weed ordinance as described in MM 4.5.1(c).

The Conservation Element has been revised to generally include this suggested edit under CON-17(d).

Response 121-34 P: Commenter requests a new Conservation Element policy as follows:

The County shall support sustainable agricultural practices, private stewardship activities, and the formation and activities of volunteer stewardship groups in all three major watersheds,

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particularly appellation and stream, creek or river watershed-based organizations, by

- a) Supporting grant applications
- b) Facilitating access to data, and
- c) Working to support increased landowner participation sustainable practices and stewardship groups as needed.

The Conservation Element has been revised to generally include this suggested edit as a new policy CON-3.

Response 121-35 P: Commenter requests a change to Conservation Element Policy CON-11 adding three action items as follows:

Action Item CON-11.1: The County shall adopt an ordinance requiring review of the impact on natural resources of development projects involving residences in excess of 5,000 square feet and mitigation of any impacts shall be required.

Action Item CON-11.2: In order to enable complete consideration of impacts, including those that are cumulative, the County shall adopt an ordinance to address the practice of piecemeal development which avoids environmental review of the full project.

Action Item CON-11.3: The County shall adopt protocols to be followed, including buffers and setbacks where development is proposed on a parcel that contains sensitive biotic communities or biotic communities of limited distribution, including public notice of the development and steps taken to comply with the protocol.

(Include map from BDR showing location of communities.)

The Conservation Element has been revised to generally include this suggested edit under revised Policy CON-13 and related action items.

Response 121-36 P: Commenter requests that Conservation Element Policy CON-12 be expanded to add language regarding fencing as follows:

- c) *The County shall require that fencing of natural areas not inhibit or otherwise interfere with wildlife movement.*
- d) *The County shall develop a program to improve and continually update its database of wildlife information, including identifying threats to wildlife habitat and barriers to movement.*
- e) *The County shall develop a program to protect and enhance our high level of wildlife biodiversity, particularly including sensitive wildlife species.*

(Include map from DEIR in GP showing wildlife corridors.)

The Conservation Element has been revised to generally include this suggested edit under revised Policy CON-18(f).

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Response 121-37 P: Commenter requests a new policy be added to the Conservation Element as follows:

The County shall establish and continually update management plans tailored to the issues and threats to biological resources in each of the 13 evaluation areas, and shall use those plans to create programs to protect and enhance biological resources and to review development projects and craft appropriate mitigations to protect the existing level of biodiversity.

The Conservation Element has been revised to generally include this suggested edit under new Policy CON-18(g) and related action items.

Response 121-38 P: Commenter requests that current GP language be added in the Conservation Element for Policy CON-22 as follows:

Support hardwood cutting criteria that require adequate stands of oak trees for wildlife and slope stabilization, soil protection and soil production be left standing

Maintain to the fullest extent possible a mixture of oak species which is needed to ensure acorn production. Black, canyon, live and brewer oaks as well as blue, white, scrub, and live oaks are common associations.

Where possible, encourage preservation of remaining native valley and live oaks. Where preservation is not possible, encourage appropriate replacement.

The Conservation Element has been revised to generally include this suggested edit under revised Policy CON-24(e) and (f).

Response 121-39 E/P: Commenter notes that the Draft EIR proposes to mitigate for loss of farmland with equal acreage, so that sensitive biotic communities should be treated similarly by the addition of language as follows:

Preserve and protect biotic communities of limited distribution and native grasslands...

b) In other areas, avoid disturbances to or removal of limited distribution biotic communities or sensitive natural plant communities and mitigate potentially significant impacts to the extent feasible where avoidance is not achievable, such mitigation to include long term preservation of equal acreage that includes such communities preferably onsite but at a minimum with the County.

d) Require monitoring and active management where biotic communities of limited distribution or sensitive.....

The Conservation Element has been revised to generally include this suggested edit under Policy CON-17(d).

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Response 121-40 E/P: Commenter requests that the text of Conservation Element Goal CON-10 should not be changed from the current General Plan regarding studies to develop an understanding of surface and underground water supplies in Napa County. This information should be presented in the Draft EIR to assist in updating the General Plan.

The Conservation Element has been revised to generally include this suggested edit under revised Goal CON-14 and related groundwater policies and action items.

Response 121-41 E/P: Commenter notes that global warming/climate change is an established fact and needs to be included in the General Plan and references analysis provided in the Draft EIR in regards to this issue. The commenter also summarizes potential environmental effects associated with climate change. Climate Change Master Response 3.4.4 provides a summary of current information regarding the potential environmental effects of climate change on the County commonly noted by comment letters on the proposed General Plan Update and Draft EIR (impacts to water resources, sea level rise, flooding and wine production), which notes that there is not adequate or detailed data to determine the exact effects on the physical environment of Napa County. This would also include potential increases wildlife hazards and extreme weather events. Thus, it is considered speculative to determine that the environmental effects of climate change to Napa County would be significant. The commenter is referred to Climate Change Master Response 3.4.4 regarding modifications that have been conducted to the Circulation and Conservation Element (since release of the public draft of the proposed General Plan Update and the Draft EIR) to include additional policy provisions that would require and/or encourage activities in the County to reduce greenhouse gas (GHG) emissions in the general categories of transportation sources, construction sources, stationary and building sources, energy sources and the consideration of GHG off-sets. A new section has been included in the revised Conservation Element entitled Climate Protection and Sustainable Practices for Environmental Health.

Response 121-42 E/P: Commenter identifies concerns regarding anticipated GHG emission from transportation sources, building and energy sources, and identifies that the proposed General Plan Update does not identify carbon sequestration of the County's ecosystems. Draft EIR pages 4.8-35 through -38 provide estimations of transportation and residential sources of GHG anticipated between 2005 and 2030 under alternatives A through C, as well as qualitative discussion of CO₂ sequestration capabilities of the County. The commenter is referred to Climate Change Master Response 3.4.4 regarding preliminary estimates of GHG emissions from non-residential land uses and modifications that have been conducted to the Circulation and Conservation Element to include additional policy provisions that would require and/or encourage activities in the County to reduce GHG emissions.

Response 121-43 P: Commenter requests a new policy be added to the Ag/LU Element as follows:

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On-going evaluation of productivity of grape crop in relation to climate change, with provision for aggressive investigation of alternative economic endeavors for Napa County should it become necessary. These should favor continuing emphasis on agricultural production as the chief county economic activity.

The County appreciates the commenter's input associated with this issue. However, the suggested changes were not incorporated into the Ag/LU Element. The Conservation Element has been modified to include many policies that address climate change, including a policy requiring the County to monitor its environmental effects and adjust its policies as required in the future.

Response 121-44 P: Commenter requests that a new policy be added to the Ag/LU Element as follows:

Encourage state support of research into warm-weather grape varieties and production techniques.

The County appreciates the commenter's input associated with this issue. However, the suggested changes were not incorporated into the Ag/LU Element.

Response 121-45 E/P: Commenter requests that County staff restore current LU Goal 2. A higher growth rate noted in the Draft EIR will impair the ability to meet state-mandated GHG emissions reductions. Components of the current LU Goal 2 are in the revised Goal Ag/LU-4.

Response 121-46 E/P: Commenter requests additional language to Circulation Goal 3 as follows:

County policies shall be directed toward decreasing GHG emissions by encouraging increased use of non-motorized modalities (walking and bicycling), more efficient use of automobiles (carpooling, van pools), improving the public transit system, increasing the average efficiency of gas-powered vehicles, and switching to cleaner fuels such as bio-fuels and electricity.

The Conservation Element and Circulation Element have been revised to generally include this suggested edit. The commenter is referred to Climate Change Master Response 3.4.4.

Response 121-47 P: Commenter requests that Circulation Element Policy CIR-3.2 attach specific targets for energy-efficient forms of transportation to this policy.

Policy provisions in the Conservation Element (as well as mitigation measure MM 4.8.7) indicate the County's commitment to reducing greenhouse gas emissions consistent with state law. In addition, policies in the Circulation Element already express the County's support for increasing the share of non-vehicle trips in the unincorporated area.

Response 121-48 P: Commenter suggests adding a numeric target to Circulation Element Objective CIR-3.2.

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The Circulation Element has been revised to include Objective CIR-3 which requires the County to work with Caltrans and other agencies to construct or designate approximately 40 miles of additional bicycle lanes in Napa County by 2030, consistent with priorities identified in the Napa Countywide Bicycle Master Plan.

Response 121-49 P: Commenter suggests adding a numeric target to Circulation Element Action Item CIR-3.4.1.

The Circulation Element has been revised to generally include this suggested edit by setting forth a target consistent with the Bay Area's single occupant vehicle trip percentages. The commenter is referred to Climate Change Master Response 3.4.4.

Response 121-50 P: Commenter suggests adding telecommuting as an option in Policy CIR-3.5.

The Conservation Element and Circulation Element have been revised to generally include this suggested edit. For instance, Policy CIR-29 requires the County to demonstrate leadership in the implementation of programs encouraging alternative transportation and fuel options; the policy includes flexible working hours or telecommuting where possible as a program example. The commenter is referred to Climate Change Master Response 3.4.4.

Response 121-51 P: Commenter suggests adding targets for use of public transit by tourists.

The Circulation Element has been revised to generally include this suggested edit by setting forth a target consistent with the Bay Area's single occupant vehicle trip percentages, given that there is no data available regarding current transit use by tourists.

Response 121-52 P: Commenter suggests revising Policy CIR-3.7 to indicate "shall" rather than "should."

The Circulation Element includes Policy CIR-32 which reads: "All developments along fixed transit routes shall provide appropriate amenities designed to encourage carpooling, bicycle, and transit use. Typical features could include public bus turnouts/access located in coordination with the Napa County Transportation Planning Agency, bicycle lockers, and carpool/vanpool parking." (Please note that policy numbers in the Revised General Plan Update have been changed.) The commenter is also referred to Climate Change Master Response 3.4.4.

Response 121-53 P: Commenter suggests revising Policy CIR-3.8 to indicate "shall" rather than "should."

Policy CIR-33 in the Circulation Element requires integration of pedestrian and bicycle access into all parking lots where feasible and appropriate, and consideration of such access in the evaluation of development proposals and public projects. The commenter is also referred to Climate Change Master Response 3.4.4.

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Response 121-54 P: Commenter suggests adding language to Policy CIR-3.10 regarding Caltrans.

The Circulation Element has been revised to include this suggested edit (see Policy CIR-37).

Response 121-55 P: Commenter suggests establishing target caps on average daily vehicle miles traveled in Napa County.

The Circulation Element already establishes a numeric goal for pass-through trips, which represent the fastest-growing trip type (see Objective CIR-2.1). The Circulation Element (and the Agricultural Preservation and Land Use Element) also contain numerous policies intended to decrease the number of future vehicle trips by encouraging balanced land uses and non-vehicle travel. The commenter is referred to Climate Change Master Response 3.4.4.

Response 121-56 P: Commenter suggests adding a new policy in support of Goal 3.

The Circulation Element and Conservation Element have been revised to generally include this suggested edit. The commenter is referred to Climate Change Master Response 3.4.4.

Response 121-57 E/P: Commenter suggests adding a new goal to the Conservation Element as follows:

The County Conservation and Planning Department prepare at least biannually a report containing at a minimum:

- *A summary of the most current scientific findings on the state of global warming*
- *Analysis of state and federal mandates related to eliminate climate change*
- *Description of promising technological developments which may be useful to decreasing County GHG emissions and to adapting to the effects of climate change*
- *Report of climate change effects observed in Napa County*
- *Review of success in meeting County targets for greenhouse gas emission reduction and adaptation to change.*

The Conservation Element has been revised to generally include preparation of a greenhouse gas emissions inventory and reduction plan, and to generally require monitoring over time. The commenter is referred to Climate Change Master Response 3.4.4.

Response 121-58 E/P: Commenter suggests the addition of a policy supporting Goal CON-1 requiring long-range planning and project evaluation allow for migration of wetlands northward as the current wetlands are flooded by rising Bay waters. The Conservation Element has been revised to generally include

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this suggested edit by including provisions for the monitoring and planning for the potential effects of sea level rise under Policy CON-31(e). The commenter is referred to Climate Change Master Response 3.4.4 regarding current information on expected sea level rises.

Response 121-59 E/P: Commenter suggests adding a goal to Natural Resources to preserve plant life as carbon sequestration systems. The Conservation Element has been revised to include a new section entitled Climate Protection and Sustainable Practices for Environmental Health. Carbon sequestration is called out in Policy CON-65(e).

Response 121-60 E/P: Commenter suggests adding a new policy to the new goal above to study natural, agricultural and urban ecosystems to determine their value as carbon sequestrators. The suggested policy may be one outcome of the emissions inventory and reduction plan called for in Action Item CON CPSP-2.

Response 121-61 E/P: Commenter suggests addition of a Conservation Element policy to require detrimental effects on carbon sequestration to be determined and documented in applications for new projects. The commenter's suggestion has been included in Policy CON-65.

Response 121-62 E/P: Commenter suggests adding a policy to support Conservation Element Goal 6 regarding monitoring for saltwater incursion as sea-level rises. The Conservation Element has been revised to generally include this suggested edit under new Policy CON-73. The commenter is referred to Climate Change Master Response 3.4.4 associated with the discussion of sea level rise.

Response 121-63 E/P: Commenter suggests adding a policy supporting Goal 8 to search for alternative water sources (as a result of Sierra snowpack loss) such as Baywater desalination. The Conservation Element has been revised to generally include this suggested edit under revised Policy CON-61 and related Action Items. The commenter is referred to Climate Change Master Response 3.4.4 associated with the discussion of water resources.

Response 121-64 E/P: Commenter suggests that the County participate in regional efforts to manage potential disruptions in water supply from Sierra snowpack. The Conservation Element has been revised to generally include this suggested edit under revised Policy CON-61 and related Action Items. The commenter is referred to Climate Change Master Response 3.4.4 associated with the discussion of water resources.

Response 121-65 E/P: Commenter suggests strengthening Policy CON-57 with the following revision:

...and at that time establish annual numeric targets for local production of "clean" (minimal GHG producing) energy by renewable sources, including solar, wind, biofuels, waste, and geothermal.

The Conservation Element has been revised to generally include this suggested edit in Policy CON-70.

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Response 121-66 E/P: Commenter suggests that the County require that development project proposals incorporate a GHG emissions assessment in the EIR. The Conservation Element has been revised to generally include this suggested edit in Policy CON-65.

Response 121-67 E/P: Commenter suggests that Policy CON-61 be changed from "may include" to "must at a minimum include." The suggested change has not been incorporated; however Policy CON-67 and others in the new section entitled Climate Protection and Sustainable Practices for Environmental Health attempt to address the commenter's concern.

Response 121-68 E/P: Commenter suggests that a policy be added supporting Economic Development Element Goal E-2 for local production and consumption as follows:

Decrease transportation costs of goods by encouraging production of food for local consumption farmers' markets and other venues for the sale of locally produced food and other goods purchase of locally produced food and other products by County agencies.

The County appreciates the commenter's input associated with this issue. The suggested changes were not incorporated into the Economic Development Element; however a local food policy has been included as Policy Ag/LU-19.

Response 121-69 E/P: Commenter suggests the addition of a policy supporting Safety Element Goal 1 for emergency response to catastrophic flooding. See Policy SAF-42 regarding emergency response to storms and floods. See Climate Change Master Response 3.4.4 regarding increased flooding due to sea-level rise.

Response 121-70 E/P: Commenter suggests adding to Safety Element Policy SAF-3 the potential for sea level rise to the list of environmental hazards. Policy CON-73 addresses sea level rise. The commenter is also referred to Climate Change Master Response 3.4.4 regarding sea level rise.

Response 121-71 E/P: Commenter suggests that Safety Goal 3 include a policy that would encourage coordinate with CDF and neighboring counties in plans to meet the need for more intensive fire prevention and response. The Napa Operational Hazard Mitigation Plan addresses all aspects of fire prevention and response and coordination with CAL FIRE (formerly CDF).

Response 121-72 E/P: Commenter suggests that Safety Goal 3 include a policy to evaluate project proposals in rural areas for their projected cost to the County for additional fire protection services. The General Plan Draft EIR discusses the need for fire protection services in Section 4.13.1. Policy SAF-40 requires that all critical public infrastructure intended for emergency use be provided with a source of alternative power. The Ag/LU Element directs new developments to designated urbanized areas for urban services such as fire protection services. The commenter is referred to Response 121-71 E/P and Policy SAF-20.

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Response 121-73 E/P: Commenter suggests adding a policy supporting Safety Goal 4 as follows:

Work with USGS, SF Bay Conservation & Development Commission and other agencies that operate monitoring stations to track the rise in Bay and ocean water levels.

The County appreciates the commenter's input associated with this issue. However, the suggested changes were not incorporated into the Safety Element Goal SAF-4 policies. The Conservation Element has been revised to generally include this suggested edit by including provisions for the monitoring and planning for the potential effects of sea level rise. The commenter is referred to Climate Change Master Response 3.4.4 regarding current information on expected sea level rises.

Response 121-74 E/P: Commenter suggests adding a policy supporting Safety Goal 4 as follows:

Require long-range infrastructure planning in areas including transportation, water and sewage management, and utility facilities to take into account the effects of sea-level rise.

The County appreciates the commenter's input associated with this issue. However, the suggested changes were not incorporated into the Economic Development Element. The Conservation Element has been revised to generally include this suggested edit by including provisions for the monitoring and planning for the potential effects of sea level rise. The commenter is referred to Response 121-73 E/P.

Response 121-75 E/P: Commenter suggests adding a policy supporting Safety Goal 4 as follows:

Participate in regional planning groups to manage infrastructure response to rising sea waters.

See Response 121-74 E/P.

Response 121-76 E/P: Commenter suggests adding a policy supporting Safety Goal 6 as follows:

Develop response strategies to cope with increasing storm events, flooding and landslides.

Several policies and action items address this issue under Goal SAF-6. In particular, implementation of NOAHMP would address these issues.

Response 121-77 E/P: Commenter suggests adding a policy supporting Safety Goal 6, separate from Policy SAF-42, as follows:

County Health and Human Services Department to work with cities, EMS responders and others to devise a plan to identify frail individuals, alert them during weather emergencies (heat waves, storms, and floods), and mobilize resources to transport and shelter them or provide other assistance as needed.

This language has been incorporated into SAF-42 as follows:

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"The County shall work with cities, emergency response providers, and others to develop plans and procedures to identify frail individuals, contact or alert these persons during weather emergencies (including heat waves, storms, and floods), and mobilize resources to provide transport, shelter, or other assistance as needed."

Response 121-78 E: Commenter refers to previous comments regarding water supplies, riparian habitat restoration, and endangered species recovery and circulation. The commenter also note that additional development projects have not been acknowledged in the Draft EIR for St. Helena Hospital, Aetna Springs, and estate homes in Pope Valley and Guenoc Winery.

Water supply and associated biological resource impact comments provided previously in this comment letter have been responded to under those specific comments above. The commenter provided no comments regarding the adequacy of the Draft EIR regarding endangered species recovery or circulation. However, the responses above addressed suggested changes to the proposed General Plan Update.

As identified in Draft EIR pages 4.0-1 and -2 and 5.0-2 through -6, the cumulative impact analysis considers anticipated growth of the County and region (including the cities and adjoining counties) between 2005 and 2030 that encompasses residential growth in the unincorporated portion of the County, vineyard (10,000 to 12,500 additional acres) and wineries (approximately 225 new wineries) growth, nonresidential growth, flood control improvements, future timber harvesting, and water quality improvement activities associated with the TMDLs for the Napa River. While specific approved or pending development projects are identified in the Draft EIR (see Draft EIR Table 5.0-2), Draft EIR 5.0-3 specifically notes that this list is not intended to be an all-inclusive list of development activities in the County and describes the use of population and employment projections to reflect potential development inside and outside the County by the planning horizon of 2030. This description and approach to defining the cumulative setting in the Draft EIR meets the requirements of CEQA (see State CEQA Guidelines Section 15130[b]).

Response 121-79 E: Commenter notes that the acreage estimates to Impact 4.1.1 and 4.1.2 (loss of farmland) are understated by not taking into account the loss of land area from allowed single-family and second units, agriculturally supportive and management uses. In addition, the commenter expresses concerns regarding the adequacy of mitigation measure MM 4.1.1a given that it does not completely prohibit conversion of farmlands of concern under CEQA (state-defined Prime Farmland, Unique Farmland, and Farmland of Statewide Importance).

As identified on Draft EIR Tables 4.1-12 through 4.1-14, the conversion of farmlands of concern under CEQA (which differs from General Plan designated agricultural land areas) was estimated based on proposed General Plan land use designations for non-agricultural use. While the commenter does not perceive single-family and second units, agriculturally supportive and management uses as complementary to the operation of agricultural uses, the County Code does define such uses

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complementary to agricultural operations (e.g., County Code Section 18.104.220, 18.104.180, and the Farm Management Ordinance) and are not considered a conversion to a non-agricultural use.

Regarding comments associated with mitigation measure MM 4.1.1a provisions of "where feasible," farmlands of concern under CEQA that are at risk occur in areas that are currently General Plan designated for non-agricultural use (e.g., land areas within the RULs of the cities of Napa, Yountville, St. Helena and Calistoga and the "bubble" associated with Angwin) (see Draft EIR Figure 4.1-2). Given this existing condition, complete avoidance of such land areas under the proposed General Plan Update alternatives under all circumstances may not be feasible. However, implementation of this mitigation measure and mitigation measure MM 4.1.1b (in combination with the expected trend of the County increasing its total acreage of farmlands of concern under CEQA) is expected to ensure that total farmlands of concern under CEQA are not reduced from current or historic conditions (see Draft EIR pages 4.1-11 and 4.1-27). Mitigation measure MM4.1.1a uses an approach to mitigation that is generally accepted for impacts to farmland of concern under CEQA.

Response 121-80 E: Commenter states that while they support mitigation measure MM 4.1.1b, they state it is speculative to suggest it would mitigate the impact (even taking into account existing and expected increases in farmlands of concern under CEQA).

The Draft EIR utilizes existing environmental setting information that includes the trend by the County of having its acreage of farmlands of concern under CEQA increase by 17,593 acres since 2004. As specifically noted on Draft EIR page 4.1-11, this increase of farmland acreage has been the result of vineyard development converting lower classifications of farmland. The County is projecting that an additional 10,000 to 12,500 acres of vineyards would be developed by the year 2030. Based on County projections on where this new vineyard development is expected to occur (see Draft EIR Appendix H and associated Figures 1 through 4) in relation to the important farmland mapping provided by the California Department of Conservation (see Draft EIR Figure 4.1-2), the majority of this development will occur in areas that have lower farmland classifications. Thus, the further addition of farmlands of concern under CEQA in the County by the year 2030 is not considered speculative.

It is not possible to estimate the extent of farmlands of concern under CEQA would not be converted under this mitigation measure until subsequent development projects are considered by the County. However, implementation of this mitigation measure and mitigation measure MM 4.1.1a (in combination with the expected trend of the County increasing its total acreage of farmlands of concern under CEQA) is expected to ensure that total farmlands of concern under CEQA are not reduced from current or historic conditions.

In regard to the elimination of the designated "bubbles" in the General Plan Update as an alternative, please see Response 121-3 P above. The commenter is also referred to Alternatives Master Response 3.4.2

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regarding further discussion of the concept of complete elimination of the General Plan designated bubbles.

Response 121-81 E: Commenter notes that as all alternatives for Impact 4.1.4 would result in a significant and unavoidable impact, the urban bubbles should be eliminated. The commenter is referred to Response 121-3 P and Alternatives Master Response 3.4.2.

Response 121-82 E: Commenter notes that the EIR should assess the potential impact of developments proposed for Angwin and Napa Pipe, as well as the potential for either or both areas to incorporate and/or be annexed by the City of Napa. The Draft EIR evaluates the environmental effects of a range of alternatives that incorporate potential additional development in Angwin as well as re-designation and redevelopment of the Napa Pipe site for mixed use (see Draft EIR Appendix B for a detailed description of the range of development densities assumed in each of the Draft EIR alternatives). Thus the Draft EIR analysis generally assesses the impacts of development in these areas, although it should be noted that the Draft EIR alternatives are not intended to reflect any specific development proposal for Angwin or Napa Pipe. (Specific development proposals for these areas will require project-specific environmental review pursuant to CEQA.) County staff declines to speculate regarding the likelihood of incorporation or annexation if either of these sites develops, and notes that impacts of development would be similar regardless of jurisdictional boundaries.

Response 121-83 E: Commenter notes errors and omissions in the Regulatory Section of Section 4.2, Land Use, regarding DFG, Bureau of Reclamation and Bureau of Land Management (BLM). The state agency mentioned is covered under Section 4.5, Biological Resources.

The following discussion is added to the Land Use Regulatory Section under the following heading on Draft EIR page 4.2-18:

- **Bureau of Reclamation**

Lake Berryessa is the reservoir for the Solano Project, which is owned by the Bureau of Reclamation and operated under a cooperative agreement by the Solano County Water Agency/Solano Irrigation District. The project provides flood control protection to the city of Winters and other downstream communities and high-quality water supply for irrigation and the cities of Vacaville, Suisun City, Vallejo, and Fairfield. At capacity, Lake Berryessa stores 1.6 million acre feet of water and is one of the largest bodies of fresh water in California. The lake is 23 miles long and 3 miles wide, with 165 miles of shoreline. Reclamation and the California Department of Fish and Game jointly manage a 2,000-acre wildlife area along the east side of the lake.

Regarding the discussion for the BLM, corrections have been made in responses to Comment Letter B by the BLM. The final paragraph in question was information gathered from the BLM website and not noted to be in error by the agency.

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- Response 121-84 E:* Commenter states that the Draft EIR is deficient in a number of areas for biological resources in the areas of alternatives, biodiversity, invasive species, mansion development, and erroneous conclusions regarding wildlife impacts. Responses to these issues are provided in Responses 121-85 through 121-89 as well as in Biological Resources Master Response 3.4.3.
- Response 121-85 E:* Commenter notes that the Draft EIR fails to provide a reasonable range of alternatives in regards to avoiding or lessening significant with a focus on biological resource impacts. The commenter is referred to Biological Resources Master Response 3.4.3, which explains that alternatives evaluated in the Draft EIR do avoid or lessen several identified significant impacts related to biological resources. The commenter is also referred to Alternatives Master Response 3.4.2 regarding the adequacy of the range of alternatives evaluated in the Draft EIR.
- Response 121-86 E:* Commenter identifies that the Draft EIR fails to adequately address impacts on the County's biodiversity. The commenter is referred to Biological Resources Master Response 3.4.3 which identifies that the Draft EIR does consider and disclose the extent of the County's biodiversity. The impact analyses of the Draft EIR section address impacts to the biological resources that create biodiversity including sensitive biotic communities, special-status plant species, special-status wildlife species, and ecological processes essential to maintaining biodiversity.
- Response 121-87 E:* Commenter states that the Draft EIR fails to acknowledge or address the existing issues with non-native invasive species or address the impact of their spread in the County. The commenter is referred to Biological Resources Master Response 3.4.3, which identifies that existing and future threats of invasive species to the biological resources of the County are discussed in the BDR within habitat and evaluation area discussions and is in turn utilized and referenced in the Draft EIR. Implementation of Draft EIR mitigation measure MM 4.5.1c (which has been subsequently incorporated in the revisions to the Conservation Element of the proposed General Plan Update) would minimize deleterious effects of noxious weeds to natural lands by minimizing the potential for establishment of new noxious weed populations through creation and implementation of a Noxious Weed Ordinance. While it is acknowledged that there are existing issues with non-native invasive species, CEQA does not require mitigation for existing conditions/impacts.
- Response 121-88 E:* Commenter identifies that the Draft EIR fails to consider the impact of mansions (residential development) on biological resources and specifically notes a reference in the Draft EIR (Draft EIR page 4.5-49) that suggests the impacts of such development was not considered at all. The commenter misunderstands the information provided in the Draft EIR. Draft EIR pages 4.5-48 through -49 provides a discussion of the impact analysis methodology in quantifying potential habitat impacts from implementation of the proposed General Plan Update under alternatives A through C. The reference to the extent of the disturbance was in regards to the ability to accurately estimate land disturbance, which was quantified based on anticipated vineyard development locations as well

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as General Plan land use designations. As identified on Draft EIR page 4.5-55, the impact of residential development (urban and rural) was considered in the Draft EIR impact analysis, though at a more qualitative level of detail (e.g., anticipated direct and indirect impacts on biological resources from growth anticipated under each of the three alternatives). The commenter is also referred to Biological Resources Master Response 3.4.3 regarding the consideration of "mansion" development on wildlife movement.

Response 121-89 E

Commenter notes that the Draft EIR does not adequately address wildlife movement impacts and its analysis is in conflict with the BDR. The commenter is referred to Biological Resources Master Response 3.4.3, which identifies that wildlife movement analysis is adequate and utilizes information from the BDR.

In addition, the BDR presents an analysis of the effects of a rough "build-out scenario" to wildlife movement. The assumptions of the build out scenario as presented in the BDR are as follows: "A map of developed parcels from the County land use layer was used to identify parcels where some development has taken place. According to the land cover map, many of these parcels were not fully developed in 1993. The buildout analysis assumed that the open space remaining on these parcels in 1993 would be converted to other uses, such as vineyards or housing. All land use categories except open space were considered capable of reducing wildlife movement" (Napa County, BDR 2005). While not conflicting with the information on wildlife movement corridors and biological resources in the County, the Draft EIR biological resources impact analysis is based on a more refined definition of development potential by the year 2030 under five General Plan land use alternative and circulation maps (see Draft EIR Figures 3.0-3 through 3.0-9, 6.0-1 and 6.0-2) that are based on more accurate projection of future land use conditions under the proposed General Plan (the reader is referred to Draft EIR Section 4.0, Introduction to the Environmental Analysis and Assumptions Used, for further details on the methodology of development forecasts).

3.0 COMMENTS AND RESPONSES TO COMMENTS

Response 121-90 E: Commenter suggests that the Draft EIR should determine the maximum tolerance of Napa County for further development. The purpose of an EIR is to evaluate and disclose the environmental effects of a proposed project (in this case the proposed General Plan Update) (see State CEQA Guidelines Section 15121[a]). While analysis and data regarding the ability to accommodate more development is provided in the various technical sections of the Draft EIR (see Sections 4.1 through 4.14), it is not intended to define the County's capacity or threshold for development. Nonetheless, by analyzing cumulative impacts associated with various development alternatives (e.g., 10,000 to 12,500 acres of additional vineyards in Alternatives A, B, and C), the EIR can effectively be used to articulate a threshold beyond which an additional county-wide cumulative analysis would be required. In other words, the EIR shows "how much more cumulative development impact the County can absorb" with the outcomes presented in the analysis. Development in excess of the levels assumed in the EIR alternatives would have greater impacts and require additional analysis and mitigations.

3.0 COMMENTS AND RESPONSES TO COMMENTS

Letter 122

*June 25/07: I am most grateful if you can make one tiny correction to my statement. It is printed into the text on **page 1, line 14**, in **red BOLD CAPS**. Thank you very much. mjb

June 17, 2007

NAPA COUNTY GENERAL PLAN UPDATE

Comments Submitted by: Moira Johnston Block
Primary Area of Concern: GLOBAL WARMING (GW)

The current update of Napa County's General Plan is a vital opportunity – in fact, a mandate – to prepare this County for the unprecedented challenge of global warming. 2006 was the watershed year when most of the enlightened world finally “got it” that global warming is a fact backed by irrefutable science – a reality that, unless checked and reversed by aggressive and immediate action, holds the potential for global climate catastrophe or, at best, dramatic change in our climate and our lives. There may still be some uncertainty as to the precise scale, type, and timing of events, but projections paint a scenario of, within disturbingly few decades, storm, drought and flood events of greater intensity and unpredictability -- the south Valley flooded by raised sea levels, severe water shortages, drought in the watershed with increased forest fires, salinity intrusion into groundwater, and the migration of premium grapes to cooler regions.

122-1E/P

The State of California has responded by passing AB 32, the nation's most aggressive law to reduce greenhouse gases (GHG); its goal is to reduce **carbon dioxide** emissions **50% TO 1990 LEVELS** by 2020. ~~, a more ambitious goal than Europe's target of 50% by 2050.~~

And yet Napa's Draft General Plan is an alarmingly feeble response to the reality, to the presence here and now and increasingly in our future, of climate change. The Plan holds no sense of urgency, no robust, clear and cohesive statement of goals and policies, no policy of incentives and education to involve the total community as part of the solution. Where global warming/climate change should be a major theme in the DGP's up-front *Vision for 2030*, it mentions not a word; I suggest below where it could be introduced.

The Plan lags so far behind achievement of today's State required standards that it is seriously out of sync with the DEIR prepared for the update. Numerous negative environmental impacts are listed as “unavoidable” -- unmitigatable. Napa's General Plan update must rewrite its goals, policies and Implementations to meet the environmental standards required by our DEIR and our laws. Other submitted comments (Sierra Club e.g.) specifically identify the non-correlating items in the DGP and DEIR; this will require the rigorous and

3.0 COMMENTS AND RESPONSES TO COMMENTS

knowledgeable work of experts in climate change to correct and rewrite. But it must be done.

Others are doing it. Our neighbors in Marin County and San Francisco “have already adopted comprehensive plans to reduce GHG emissions,” says Attorney General Brown in recent cautionary letters to lagging Counties urging them to meet AB 32 targets in their GP updates; the State has sued San Bernadino County for not incorporating the new standards into its General Plan update. Napa County is well advised to listen to the Attorney General’s words: “The Intergovernmental Panel on Climate Change of the United Nations recently published in its finding that overwhelming evidence establishes that global warming is occurring and is caused by human activity. With respect to impacts in the state, the California Climate Change Center reports that temperatures are expected to rise 4.7 to 10.5 deg.F by the end of the century. These increases would have serious consequences including substantial loss of snow-pack, an increase of as much as 55% in the risk of large wildfires, and reductions in the quality and quantity of agricultural products. Additionally, the report predicts increased stress on the state’s vital resources and natural landscape.....”, and on and on.

It is sad to see Napa County losing the landmark leadership that has made it the world-rank wine valley it is, and that gives its residents such a superb quality of life; I point to the Ag Preserve, growth controls, its model flood management/river restoration project. Napa’s Draft General Plan must not miss this opportunity to move Napa Valley into the 21st Century, a century in which global warming is increasingly seen as the most important issue facing the globe.

In the interests of avoiding duplication, I wish to be on record as specifically endorsing the following:

- : **The Sierra Club’s Global Warming Comments and Matrix**, and
- : **Friends of the Napa River’s Comments and Matrix** (which incorporates numerous of my suggested changes to the DGP)

I wish to submit several comments in addition to those cited by the Sierra Club and Friends of the Napa River. My suggested changes and justifications are in red, bold face:

- 1: Climate change must be introduced up front, in the **Summary Vision**, perhaps Page 22, in the **Response to Change** statement:

P 22: “Napa County will respond to change and to internal and external factors in proactive ways, identifying issues before they become crises and developing innovative ways to respond.

By continuously monitoring progress and updating the County’s knowledge base, this General Plan will allow the county to respond to change. Some

122-1E/P
cont'd

122-2P

3.0 COMMENTS AND RESPONSES TO COMMENTS

issues can be foreseen now— **including** an aging population, **and** increasing pressures on agricultural lands, **and, of high urgency, our response to the projected impacts of global warming.** Others are less clear but will be dealt with as part of the ongoing process of implementing this Plan.”

122-2P
cont'd

- 2:** As climate change is finally introduced on **Page 180**, it is introduced with a yawn, in language that is weak and equivocating, with words and phrases such as “miniscule” and “small compared to other counties” diluting the urgency of dealing with a reality that, if not faced with rigorous goals and policies, could undermine Napa Valley’s economic base and quality of life. The following excerpt most concerns me:

122-3P

: Conservation Element, Page 180: “ Growing concerns about climate change have focused attention on energy generation and energy use. Climate change is presently thought to be both naturally occurring and induced by increases in the amounts of carbon dioxide (CO2) and other greenhouse gases (GHGs) in the earth’s atmosphere attributable to the burning of fossil fuels. Greenhouse gases are not currently (2006) regulated as pollutants, although the State of California has adopted legislation seeking to roll back emissions to 1990 levels for some major contributors (such as industry).

Because Napa County is primarily rural, the amount of greenhouse gases generated is small compared to the other counties in the Bay Area, and miniscule in statewide or global terms. However, like all other areas worldwide that contribute to global warming, Napa County will be affected by climate change and shares a responsibility to address this issue. These efforts will focus on reductions in the two major sources of greenhouse gases in the county: the use of energy derived from the burning of fossil fuels, and the use of fossil fuels in motor vehicles. “

Suggestions: The above excerpt from the Conservation Element, Page 180, should be strengthened and better informed by the best current science. Rigorous monitoring of cutting-edge knowledge and of impacts of global warming on Napa County, as well as a vigorous public education/action program should be added to the “efforts” listed above. Efforts should also include a call for harnessing the adaptive and resourceful nature of Napa’s winegrowing industry (as shown in current sustainable farming practices, solar energy, “green” wineries and watershed stewardship) to work with UC Davis and other sources of the best science and technology to develop viticultural programs that might help modify the impacts of global warming (in combination with a broad-based County-and-cities-wide effort to reduce emissions in Napa County).

<p>3: Agricultural Preservation and Land Use Element, Page 45, Policy Ag/LU-40. Delete entirely: “Lands along the west bank of the Napa River south of the City of Napa and specific urban areas within four miles of the high water mark of Lake Berryessa are appropriate areas for marine commercial zoning and development.”</p> <p>Justification: With the predicted gradual flooding of wetlands and lands flanking the Napa River in the County’s southern reaches, as an impact of raised sea levels associated with global warming, it is imprudent to plan commercial marine, residential or any, development in highly vulnerable areas. Wetlands and open land should be maintained in those southerly areas since they will help slow and moderate the sea level rise. In fact, it would be prudent for the County to include in the General Plan update a goal and policy of initiating a program of identifying properties north of the existing southern wetlands where new wetlands can expand as the present wetlands are subsumed.</p> <p>In addition to those changes directly related to global warming, there are several other changes in the DGP I would like to suggest:</p>	<p>122-4E/P</p>
<p>4: Wherever it is stated that development should occur in “already developed areas” (first appears Pgs 14,15), I recommend replacing that throughout the document with “existing incorporated cities and urbanized areas.”</p>	<p>122-5P</p>
<p>5: Remove the following references to private property rights as having unique status. As others have stated, this is a war most appropriately fought at the federal and state level, even though three recent local Napa County votes have shown that private property rights advocacy is not the citizens’ wish:</p> <p style="margin-left: 20px;">a) Recreation Element: Pg 255- RS Policy ROS-1: Delete the strikethrough words: “The County encourages the acquisition, location, design and management of recreational open space and facilities, in ways that protect natural resources, enhance natural habitats, conserve agricultural lands, maintain agricultural productivity and respect private property.”</p> <p style="margin-left: 20px;">b) Agriculture Element, Pg 86/87: Delete Policy Ag/LU-109 in its entirety.</p>	<p>122-6P</p>
<p>6: In the Circulation Element, I suggest a new Cir Goal as follows: : The County will take the lead in emissions reductions, becoming a model for the public, by adopting a purchasing policy for its fleet of vehicles of buying the most energy-efficient available (whether hybrid, electric, or other reliable new modalities).</p>	<p>122-7P</p>

3.0 COMMENTS AND RESPONSES TO COMMENTS

Thank you very much for this public opportunity to make input into the Draft General Plan. I wish to give enormous thanks to the County staff and the General Plan Steering Committee which gave so much citizen time on behalf of us all. It is always easier to criticize than to create, and I fully recognize all the thoughtful and creative effort they have put into presenting this Draft to the community. I will be happy to work in the future in any useful way to help achieve the needed changes.

Moira Johnston Block
931 Marina Drive
Napa, CA 94559
moiraj@napanet.net
707-257-6023

3.0 COMMENTS AND RESPONSES TO COMMENTS

LETTER 122: MOIRA JOHNSTON BLOCK, JUNE 17, 2007

Response 122-1 E/P: Commenter notes that the proposed General Plan Update must rewrite goals, policies, and implementations per the global warming comments made by the Sierra Club and Friends of the Napa River (FONR). County staff appreciates the concern that Napa address climate change in the General Plan policies. Recommendations made by both the Sierra Club and FONR have been comprehensively incorporated into the Conservation Element under the Open Space, Water Resources, Air Resources, and Natural Resources goals and policies. In addition, new goals and policies have been included under the heading of Climate Change and Sustainable Practices. Please see Climate Change Master Response 3.4.4 for more information.

Response 122-2 P: Commenter notes that climate change must be introduced in the Summary Vision section, perhaps on page 22. Commenter is referred to Response 122-1 E/P above and to Climate Change Master Response 3.4.4.

Response 122-3 P: Commenter presents an excerpt from the Conservation Element on page 180 regarding GHG emissions and suggests that it be strengthened by the best current science. In addition, rigorous monitoring of knowledge and impacts of global warming on the County and public education programs should be included as "efforts." As noted in Response 122-1 E/P, many of these items have been incorporated into the Conservation Element. Additional information is provided in the Climate Change Master Response 3.4.4.

Response 122-4 E/P: Commenter suggests that Policy Ag/LU-40 be deleted entirely as it is imprudent to plan development in vulnerable areas. As Lake Berryessa is a manmade reservoir, it is not identified by the County as a vulnerable area prone to flooding due to sea level rise. As identified in the Draft EIR on page 4.11-73, the County allows for development within designated flood areas provided that residential structures are built at least one foot higher than the 100-year flood level and non-residential structures are either elevated similar to residential structures or provide an alternate form of flood proofing. Since release of the Draft EIR and the public draft of the General Plan Update, the Conservation Element has been further revised to include policy provisions that would require the County to monitor changes in sea level and implement adaptive water management practices to address salt water intrusion to protect groundwater resources. See Climate Change Master Response 3.4.4 for a discussion of potential sea level elevation changes for Napa County.

Response 122-5 P: Commenter suggests that wherever stated that development should occur in "already developed areas" to replace with "existing incorporated cities and urbanized areas." This change has been made throughout the document as appropriate.

Response 122-6 P: Commenter suggests that references to private property rights as a unique status in Policies ROS-1 and Ag/LU-109 be removed. The County appreciates the commenter's input on this issue. However, this change has not been made to these policies. County staff believes the Revised

3.0 COMMENTS AND RESPONSES TO COMMENTS

General Plan Update strikes an appropriate balance between private property rights and other concerns.

Response 122-7 P: Commenter suggests a new goal for the Circulation Element to read as follows: "The County will take the lead in emissions reductions, becoming a model for the public, by adopting a purchasing policy for its fleet of vehicles of buying the most energy-efficient available (whether hybrid, electric, or other new modalities)."

Please see Policy CON-70 in the Conservation Element, which addresses this issue.

Letter 123

-----Original Message-----

From: Gary Merkel [<mailto:ngarym@sonic.net>]
Sent: Sunday, June 17, 2007 4:26 PM
To: Gitelman, Hillary
Cc: Lowe, Rone Patrick
Subject: General Plan Comments/Cultural and Historic Resources

June 17, 2007

Ms. Hillary Gitelman, Napa County Planning Director Napa County Conservation,
Development and Planning Department
119 5 3rd Street, Suite 210
Napa, CA 94559

Napa County Board of Supervisors
General Plan Revision Committee

RE: General Plan Comments
Cultural and Historic Resources

Dear Ms. Gitelman:

Thank you for your good work, and that of your peers, in introducing language, goals and policies appropriate for the long-term preservation and revitalization of historic locations in Napa Valley. Preserving the great heritage of the Valley is a responsibility that must be taken seriously by every Californian, every generation. It is therefore with great concern that I have reviewed and endorsed the Cultural Resource Goals & Policies put forth in the February 16th, 2007 Public Review Draft (CC-4,CC-24 & 25).

123-1E/P

I have been aware for some time that certain historic treasures are languishing and deteriorating due to the /lack of viable use as a result of restrictive and insensitive land use policies/ put forth and maintained by the county. The current draft (02-17-07), if accepted, would go a long way toward honoring the former splendor of these locations and realign land use policies and incentives with the new economic realities of tourism and the hospitality industry. In my opinion, the county is missing well needed revenue opportunities by not promulgating a framework whereby these former locations and their improvements can be restored or updated for the benefit of the current and forthcoming generation.

To this point, I would urge the expansion of action item CC 25-1, to include strong language that would permit historic buildings that have lost their 'historic integrity' to either be restored, or permitted a more intense use toward the various ends stated above.

Once again, thank you, and, please, continue the good work.

Sincerely,

N. Gary Merkel

3.0 COMMENTS AND RESPONSES TO COMMENTS

LETTER 123: N. GARY MERKEL, JUNE 17, 2007

Response 123-1 E/P: Commenter urges the expansion of Action Item CC 25-1 to include strong language that would permit historic buildings that have lost their "historic integrity" to either be restored or permitted a more intense use toward the benefit of the current and forthcoming generation. Revisions have been made to the Community Character Element policies that allow for incentives for historic preservation; however historic "integrity" remains an important concept and a prerequisite for the new incentive proposed for the rehabilitation and reuse of historic buildings. If this were not the case, a property owner could seek to benefit from an historic cornerstone or a single historic rafter, rather from rehabilitation of legitimate historic buildings.

Letter 124

June 18, 2007

Ms. Hillary Gitelman
Napa County Planning Director Napa County Conservation
Development and Planning Department
1195 3rd Street, Suite 210
Napa, CA 94559

Napa County Board of Supervisors
General Plan Revision Committee

**RE: GENERAL PLAN COMMENTS
CULTURAL AND HISTORIC RESOURCES**

Dear Ms. Gitelman:

Thank you for your good work, and that of your peers, in introducing language, goals and policies appropriate for the long-term preservation and revitalization of historic locations in Napa Valley. Preserving the great heritage of the Valley is a responsibility that must be taken seriously by every Californian, every generation. It is therefore with great concern that I have reviewed and endorsed the Cultural Resource Goals & Policies put forth in the February 16th, 2007 Public Review Draft (CC-4,CC-24 & 25).

124-1E/P

I have been aware for some time that certain historic treasures are languishing and deteriorating due to the /lack of viable use as a result of restrictive and insensitive land use policies/ put forth and maintained by the county. The current draft (02-17-07), if accepted, would go a long way toward honoring the former splendor of these locations and realign land use policies and incentives with the new economic realities of tourism and the hospitality industry. In my opinion, the County is missing out on well needed revenue as well as job opportunities at many skill levels by not promulgating a framework whereby these former locations and their improvements can be restored or updated for the benefit of the current and forthcoming generation.

To this point, I would urge the expansion of action item CC 25-1, to include strong language that would permit historic buildings that have lost their 'historic integrity' to either be restored, or permitted a more intense use toward the various ends stated above.

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3.0 COMMENTS AND RESPONSES TO COMMENTS

*Ms. Hillary Gitelman
June 18, 2007
Page 2 of 2*

Once again, thank you, and, please, continue the good work.

Sincerely,



Norman J. Eggen
925.283.2221
neggen@colliersparrish.com

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3.0 COMMENTS AND RESPONSES TO COMMENTS

LETTER 124: NORMAN J. EGGEN, JUNE 18, 2007

Response 124-1 E/P: Commenter urges the expansion of Action Item CC 25-1 to include strong language that would permit historic buildings that have lost their "historic integrity" to either be restored or permitted a more intense use toward the benefit of the current and forthcoming generation. Commenter's letter is identical to Letter 123 above. See Response 123-1 E/P.

3.0 COMMENTS AND RESPONSES TO COMMENTS

Letter 125

From: Penelopekendall@aol.com [mailto:Penelopekendall@aol.com]
Sent: Monday, June 18, 2007 4:50 PM
To: CDP; Gitelman, Hillary
Subject: NAPA COUNTY GENERAL PLAN REVISIONS

GP Revisions Committee and County Staff

Dear Ms. Gitelman, Committee and all concerned:

Over the past 25 years I have been saddened and perplexed by the lack of recognition of a comparatively few, though very special Napa County Landmarks. I understand that at one time the County had a 'Historic Overlay' which would have allowed the possibility for these sites to be restored to their historic uses and thereby saved from ongoing deterioration or loss.

125-1P

I am very enthused by your policies in the '*Cultural and Historic Resources*' section which prospectively will restore such opportunities and ensure the future use and enjoyment of Napa County Living History.

Respectfully,

Penelope Kuykendall
1990 Soda Canyon Road
Napa CA

3.0 COMMENTS AND RESPONSES TO COMMENTS

LETTER 125: PENELOPE KUYKENDALL, JUNE 18, 2007

Response 125-1 P: Commenter states enthusiasm with the policies in the Cultural and Historic Resources section [Community Character Element], which will prospectively restore opportunities and ensure the future use and enjoyment of Napa County living history. County Staff appreciates the commenter's endorsement of the Cultural and Historic Resources goals and policies.