This section discusses the additional topics statutorily required by CEQA. The topics discussed include significant irreversible environmental changes/irretrievable commitment of resources, significant and unavoidable environmental impacts, and growth-inducing impacts.

7.1 GROWTH-INDUCING IMPACTS

INTRODUCTION

The California Environmental Quality Act (CEQA) State Guidelines Section 15126.2(d) requires that an Environmental Impact Report (EIR) evaluate the growth-inducing impacts of a proposed action. A growth-inducing impact is defined by the State CEQA Guidelines as:

The way in which a proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth...It is not assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment.

A project can have direct and/or indirect growth inducement potential. Direct growth inducement would result if a project, for example, involved construction of new housing. A project would have indirect growth inducement potential if it established substantial new permanent employment opportunities (e.g., commercial, industrial or governmental enterprises) or if it would involve a construction effort with substantial short-term employment opportunities that would indirectly stimulate the need for additional housing and services to support the new employment demand (*Napa Citizens for Honest Government v. Napa County Board of Supervisors*). Similarly, a project would indirectly induce growth if it would remove an obstacle to additional growth and development, such as removing a constraint on a required public service. A project providing an increased water supply in an area where water service historically limited growth could be considered growth inducing.

The CEQA Guidelines further explain that the environmental effects of induced growth are considered indirect impacts of the proposed action. These indirect impacts or secondary effects of growth may result in significant, adverse environmental impacts. Potential secondary effects of growth include increased demand on other community and public services and infrastructure, increased traffic and noise, and adverse environmental impacts such as degradation of air and water quality, degradation or loss of plant and animal habitat, and conversion of agricultural and open space land to developed uses.

Growth inducement may constitute an adverse impact if the growth is not consistent with or accommodated by the land use plans and growth management plans and policies for the area affected. Local land use plans provide for land use development patterns and growth policies that allow for the orderly expansion of urban development supported by adequate urban public services, such as water supply, roadway infrastructure, sewer service, and solid waste service.

COMPONENTS OF GROWTH

The timing, magnitude, and location of land development and population growth in a community or region are based on various interrelated land use and economic variables. Key variables include regional economic trends, market demand for residential and non-residential uses, land availability and cost, the availability and quality of transportation facilities and public services, proximity to employment centers, the supply and cost of housing, and regulatory

policies or conditions. Since the general plan of a community defines the location, type and intensity of growth, it is the primary means of regulating development and growth in California.

GROWTH EFFECTS OF THE PROJECT

Based on Government Code Section 65300, the proposed General Plan Update is intended to serve as the overall plan for the physical development of the County of Napa. While the General Plan does not specifically propose any development projects, it does regulate future population and economic growth of the County that would result in direct and indirect growth-inducing effects.

Implementation of the proposed General Plan Update would refine existing land use designations in the County, establish new policy provisions that guide and manage future development and land uses in the unincorporated areas of the County. This would also include policy direction on roadway facility improvements, public service improvements and the extension and expansion of utilities. The specific environmental effects resulting from the direct growth effects of proposed land use patterns and associated extension of public services by the year 2030 are discussed in Sections 4.1 through 4.14 of this DEIR. The following is a discussion of the growth-inducing effects of the project.

Population Growth

As described in Section 4.3 (Population/Housing/Employment), the Association of Bay Area Governments (ABAG) future growth projections for the unincorporated portion of Napa County between the years 2005 and 2030 is 890 dwelling units and 4,440 jobs for a projected jobs/housing balance of 2.6:1, while the proposed General Plan Update Alternatives A through E are expected to generate approximately 1.951 to 7.635 dwelling units and 8.603 to 14.376 jobs for a project jobs/housing balance of 2.9:1 to 1.8:1 (see Tables 4.3-12 and 4.3-13 and Section 6.0). As noted under Impact 4.3.1 and under Section 6.0 (Project Alternatives), the General Plan Update under all alternatives could accommodate growth in excess of amounts projected by ABAG. The direct environmental effects of this growth are addressed in Sections 4.1 through 4.14 of this DEIR. It should be noted that growth would still be continued to be managed by the County through continued application of the provisions of Measure J and the County's Housing Allocation Program (Measure A). Also, the General Plan Update does not propose elimination of the 40-160 acre minimum parcel sizes which have served to limit subdivisions and development throughout much of the County for thirty years or more. (Only Alternative E would reduce some minimum parcel sizes - probably from 160 to 40 acres.) The reader is referred to Section 3.0 (Project Description) and Section 4.3 (Population/Housing/Employment) for a further discussion of these County growth control measures.

General Plan Update Alternatives B, C, and E would result in improved jobs/housing balance conditions for the unincorporated portion of the County (as compared to current conditions of 2.5:1). However, these alternatives (in addition to Alternatives A [2.9:1 ratio] and D [2.8:1 ratio]) would continue to see an imbalance between jobs and housing. The demand for additional housing (beyond what is proposed under the General Plan Update alternatives) could range from approximately 3,823 additional dwelling units (Alternative C) to approximately 10,709 additional dwelling units (Alternative A) by the year 2030 (assuming a factor of 1.5 jobs per dwelling unit). Based on ABAG population projection estimates for the County and the region, some of this housing demand could met by anticipated growth of the cities within the County (e.g., cities of American Canyon and Napa are anticipated to increase their populations by approximately 16,400 persons between 2005 and 2030). The environmental effects of development within the cities consistent with regional projections are addressed in Sections 4.1

through 4.14 of this DEIR. Workers would likely also seek housing opportunities outside of the County and commute into the County for employment. The majority of these workers would reside in urban areas in Solano, Sonoma and Contra Costa counties, as indicated by the results of the traffic modeling described in Section 4.4 (Transportation) and **Appendix C**. Increased vehicle trips to and from the County would result in higher peak traffic volumes and congestion of County and regional roadways. In addition to impacts on the County's transportation network, the increase in vehicle trips to and from the County would also result in impacts to air quality and traffic noise.

Growth Effects Associated with Infrastructure Improvements

The proposed General Plan Update would indirectly induce growth if it would remove an obstacle to additional growth and development, such as removing a constraint on a required public service. The majority of the unincorporated County is served by well and septic systems rather than municipal services. Where municipal services do exist, they are largely provided by other public and private service providers that utilize master plans for guiding planned facility and service expansions that are subject to environmental review under CEQA. However, proposed General Plan Update Alternatives B. C and E would include major roadway improvements in the County. While these improvements are intended to provide improved level of service operation and traffic safety, they could also induce growth if they facilitate travel such that commuters are encouraged to live outside the County. Similarly, while the proposed extension of recycled water to Coombsville and Carneros under Alternatives B, C and E is intended to address current local groundwater supply issues, the provision of this water source could induce growth if it resulted in more vineyards, wineries, and second units than would otherwise be constructed in the County. In both instances (proposed roads and recycled water), there is no evidence that the proposed improvements would necessarily lead to growth beyond what has been included in the analysis of Alternatives B, C and E. This is because the travel model used to analyze these alternatives already considers travel times and other factors related to the distribution of housing and employment in its assessment of traffic operations. And the projections developed for wineries (employment), second units (population), and vineyard development are based on consideration of county-wide trends and a variety of local and regional economic factors.

ENVIRONMENTAL EFFECTS OF GROWTH

As described above, the proposed General Plan Update is considered to be growth-inducing because of projected population and employment growth and the resulting jobs/housing balance in some alternatives. The environmental effects of growth within the unincorporated County are addressed in Sections 4.1 through 4.14 of this DEIR, and the project's cumulative impacts are addressed in Section 5.0. The following additional environmental effects could be experienced due to growth in the region:

- Aesthetics Further conversion of rural, agricultural and natural open space landscape characteristics
- Air Quality Increases in air pollutant emissions potentially conflicting with air quality attainment efforts under state and federal Clean Air Acts, and increased potential for the exposure to toxic air contaminants.
- Biological Resources Loss of special-status plant and animal species habitats, degradation of habitats, and loss of special-status species.

- Cultural Resources Impacts to known and unknown archaeological, paleontogical and historic resources in the region.
- Hydrology and Water Quality Additional sources of point and non-point sources of surface water quality pollutants to region waterways. Further demand on groundwater resources and potential overdraft issues.
- Noise Increased transportation noise levels from increased traffic volumes.
- Public Services and Utilities Increased demand for the development and expansion of public services and facilities and associated environmental issues.
- Traffic Increased traffic volumes on the region's highways and regional roadways resulting in deficient levels of service of operation.

7.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL EFFECTS

CEQA Sections 21100(b) (2) and 21100.1(a) require that EIRs prepared for the adoption of plan, policy, or ordinance of a public agency must include a discussion of significant irreversible environmental changes of project implementation. In addition, CEQA Guidelines Section 15126.2(c) describes irreversible environmental changes as:

Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

Implementation of the proposed Napa County General Plan Update would result in the conversion of undeveloped open space land areas to agricultural (primarily vineyard development) residential, commercial, industrial, office, public and recreational uses. Subsequent development under the General Plan Update would constitute a long-term commitment to these uses. It is unlikely that circumstances would arise that would justify the return of the land to its original condition.

Development of the County would irretrievably commit building materials and energy to the construction and maintenance of vineyards and associated vineyard activities, buildings and infrastructure. Renewable, nonrenewable, and limited resources that would likely be consumed as part of the development of the proposed project would include, but are not limited to: oil, gasoline, lumber, sand and gravel, asphalt, water, steel, and similar materials. In addition, development of the project would result in the increase demand on public services and utilities (see Section 4.11 [Hydrology and Water Quality] and 4.13 [Public Services and Utilities]). The project would also result in significant unavoidable effects related to air emissions, including emissions of green house gases (see Section 4.8 [Air Quality]).

7.3 SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL EFFECTS

CEQA Guidelines Section 15126.2(b) requires an EIR to discuss unavoidable significant environmental effects, including those that can be mitigated but not reduced to a level of insignificance. In addition, Section 15093(a) of the CEQA Guidelines allows the decision-making

agency to determine the benefits of a proposed project outweigh the unavoidable adverse environmental impacts of implementing the project. The County can approve a project with unavoidable adverse impacts if it prepares a "Statement of Overriding Considerations" setting forth the specific reasons for making such a judgment.

The following significant and unavoidable impacts (project and cumulative) of the proposed General Plan for Alternatives A, B and C are specifically identified in Sections 4.1 through 4.14, and Section 5.0 of this EIR. The reader is referred to the various environmental issue areas of these sections for further details and analysis of the significant and unavoidable impacts identified below.

AGRICULTURE

- Impact 4.1.2 Implementation of the proposed General Plan Update would result in the loss of agricultural land as designated on the current Napa County General Plan Land Use Map (Significant and Unavoidable Alternative C and E).
- Impact 4.1.4 Implementation of the proposed General Plan could result in a conflict with existing agricultural zoning or Williamson Act contracts. (Significant and Unavoidable All Alternatives).

POPULATION/HOUSING/EMPLOYMENT

- Implementation of the proposed Napa County General Plan Update could result in substantial growth in 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. (Significant and Unavoidable All Alternatives)
- Implementation of the proposed Napa County General Plan could alter the ratio or "balance" between housing and employment in the unincorporated area, substantially increasing commutes in or out of the county. (Significant and Unavoidable Alternative A and D)

TRANSPORTATION

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. (Significant and Unavoidable - All Alternatives)

BIOLOGICAL RESOURCES

Impact 4.5.2 Land uses and development under the proposed General Plan Update could result in the loss of sensitive biotic communities and oak woodlands within the County (Significant and Unavoidable - All Alternatives)

NOISE

- Impact 4.7.3 Traffic-related noise would increase along County roadways with projected increases in traffic volumes under all future scenarios. (Significant and Unavoidable All Alternatives)
- Impact 4.7.4 Proposed General Plan Update Circulation Element roadway improvements associated with Alternatives B and C could move traffic noise closer to noise-sensitive uses. (Significant and Unavoidable Alternatives B, C and E)

AIR QUALITY

Impact 4.8.1 Implementation of the General Plan Update would not be consistent with the Clean Air Plan (CAP) since County population and employment projections would exceed regional growth projections prepared by ABAG and projected VMT would increase at a faster rate than the population. Land uses and development would result in increased emissions of ozone precursors resulting primarily from vehicles. The increased emissions would exceed the BAAQMD thresholds. In addition, the General Plan Update would not fully support the Clean Air Transportation Control Measures that Cities and Counties are identified as having a role in implementing. (Significant and Unavoidable – All Alternatives)

- Impact 4.8.2 Implementation of the General Plan Update would lead to construction and new residential uses that could have wood burning devices. These activities would increase PM₁₀ emissions for an area that already exceeds the State ambient air quality standards. (Significant and Unavoidable All Alternatives)
- Impact 4.8.5 Implementation of the General Plan Update may locate new sensitive receptors near existing or future sources of toxic air contaminants (TACs). In addition, existing sensitive receptors could be affected by new sources of toxic air contaminants developed under the General Plan Update. (Significant and Unavoidable Alternatives B, C and E).
- 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)

GEOLOGY AND SOILS

- Impact 4.10.1 Land uses and development under the proposed Napa County General Plan Update may expose people, structures, and development to ground shaking as a result of earthquakes resulting in the risk of loss, injury, or death. (Significant and Unavoidable All Alternatives)
- Impact 4.10.2 Land uses and development under the proposed Napa County General Plan Update may expose people, structures, and development to seismic-related ground failures including surface fault rupture, lateral spreading, lurching,

liquefaction, as well as potential failure of dams and levees resulting in the risk of loss, injury, or death. (Significant and Unavoidable - All Alternatives)

Impact 4.10.4

Land uses and development under the proposed Napa County General Plan Update may expose people, structures, and development to slow or rapidly occurring down slope earth movement resulting in the risk of loss, injury, or death. This type of hazard can be triggered seismically, result from seasonal saturation of soils, erosion, or grading activities. (Significant and Unavoidable - All Alternatives)

Impact 4.10.5

Land uses and development under the proposed Napa County General Plan Update may expose people, structures, and development to the damaging effects of ground subsidence resulting in the risk of loss, injury, or death. This type of hazard can be triggered seismically, result from seasonal saturation of soils, or result from by grading activities. (Significant and Unavoidable - All Alternatives)

HYDROLOGY AND WATER QUALITY

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. (Significant and Unavoidable – All Alternatives)

CULTURAL AND PALEONTOLOGICAL RESOURCES

Impact 4.12.2

Projected development under the proposed Napa County General Plan Update could result in the substantial alteration or demolition of significant historic architectural resources (e.g., buildings, structures, and/or stone walls). (Significant and Unavoidable– All Alternatives).

PUBLIC SERVICES AND UTILITIES

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 and distribution facilities to meet projected demands at year 2030 and at year 2050. (Significant and Unavoidable – All Alternatives)

CUMULATIVE IMPACTS

Population/Housing/Employment

Impact

Land uses and growth under the proposed General Plan EIR under all alternatives would include increases to population, housing and employment in the County that would be in addition with anticipated growth of the cities of Napa County and region, as well as cities in other adjacent counties. This impact would be cumulatively considerable.

Transportation

Impact

Land uses and growth under the proposed General Plan Update under all alternatives as well as potential development in the incorporated areas would contribute to significant impacts on local roadways and state highways under cumulative conditions. This impact would be cumulatively considerable.

Biological Resources

Impact

Land uses and growth under the proposed General Plan under all alternatives along with other land use activities in the region and state-wide would substantially contribute to cumulative impacts associated with significant effects to special-status plant and wildlife species, sensitive natural communities, and movement corridors. The impact to sensitive biotic communities would be cumulatively considerable.

Noise

Impact

Land uses and growth under the proposed General Plan under all alternatives along with potential development of the incorporated areas and neighboring counties could result in increased traffic noise along local and regional roadways and highways. This impact would be cumulatively considerable.

Air Quality

Impact

Land uses and growth under the proposed General Plan Update under all alternatives along with potential development of the incorporated urban areas could conflict with existing regional efforts to achieve attainment of ambient air quality standards for ozone and particulate matter. This impact would be cumulatively considerable.

Impact

Land uses and growth under the proposed General Plan Update under all alternatives along with potential development of the incorporated urban areas 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. This impact would be cumulatively considerable.

Geology and Soils

Impact

Land uses and growth under the proposed General Plan Update under all alternatives along with development of the existing urban areas in the cities of the County and the region could result in cumulative impacts to geologic and seismic hazards by increasing population in a seismically active area. This impact would be cumulatively considerable.

Hydrology and Water Quality

Impact

Land uses and growth under the proposed General Plan Update under all alternatives in combination with current land uses in the unincorporated area

of the County and land use activities and development of the cities and other agencies in the County would result in increased demand on groundwater supplies, leading to groundwater decline and overdraft, which could contribute to cumulative water supply conditions. This impact would be cumulatively considerable.

Cultural and Paleontogical Resources

Impact

Land uses and growth under the proposed General Plan Update under all alternatives along with foreseeable land use activities and development in the region could result in the disturbance of cultural and paleontological resources (i.e., prehistoric sites, historic structures, and isolated artifacts and features) and human remains. This impact would be cumulatively considerable.

Public Services and Utilities

Impact

Land uses and growth under the proposed General Plan Update under all alternatives along with foreseeable land use activities and development in the County would increase the demand for additional sources of potable and irrigation water as well as additional or expanded treatment and distribution facilities to meet projected demands at year 2030 and at year 2050. This impact would be cumulatively considerable.