

6.2 CONSIDERATIONS FOR SELECTION OF ALTERNATIVES

6.2.1 Attainment of Project Objectives

The fundamental purpose of the CAP is to provide a comprehensive roadmap to address the challenges of climate change in unincorporated Napa County. Acting on climate change means both reducing GHG emissions from local sources in the unincorporated County and helping the community to adapt to climate change and improve its resilience over the long term.

The County has developed the following objectives for the project:

- ▲ implement the County's 2008 GP Action item CON CPSP-2 and satisfy the requirements of 2008 GP PEIR Mitigation Measure 4.8.7a;
- ▲ prepare a baseline GHG emissions inventory which updates the previous baseline inventory year of 2005 including community-wide sources of emissions in the unincorporated area of the county, and analyzes the potential growth of these emissions over time;
- ▲ identify GHG reduction strategies and measures that reduce GHG emissions from activities in the unincorporated county, along with climate adaptation measures that address the challenges of a changing climate and improve resilience in the county over the long term;
- ▲ reduce community-wide GHG emissions to meet the County's GHG reduction targets for 2020 and 2030, and provide a mechanism to make progress towards meeting the County's long-term 2050 goal; and
- ▲ provide a CAP Consistency Checklist that provides guidance for development to achieve consistency with the CAP and use CEQA streamlining tools for analysis of GHG emissions pursuant to the requirements of CEQA Guidelines Section 15183.5(b)(2).

6.2.2 Summary of Project Impacts

Sections 3.2 through 3.14 of this Draft EIR address the environmental impacts of implementation of the CAP. Potentially feasible alternatives were developed with consideration of avoiding or lessening the magnitude of larger-scale construction impacts associated with proposed GHG reduction measures. There were no significant, potentially significant, or significant and unavoidable environmental impacts identified in the Draft EIR.

6.3 ALTERNATIVES CONSIDERED BUT REJECTED FOR DETAILED ANALYSIS

Consistent with CEQA Guidelines Section 15126.6(c), a brief discussion of those alternatives considered but rejected as infeasible follows

6.3.1 No Growth/Moratorium Alternative

A moratorium is an emergency measure adopted without notice to the public or public hearings, designed to preserve the status quo. A moratorium suspends the right of property owners to submit development applications and obtain development approvals while the local legislative body considers, drafts, and adopts land use comprehensive plans and/or development regulations (or amendments thereto), to respond to new or changing circumstances not addressed in current laws.

Commenters on the NOP suggested that the County consider an alternative that would implement a moratorium on new wineries and vineyard expansions. Emergency moratoriums are allowed under government code Section 65858, “Interim ordinance as urgency measure,” with four-fifths of the legislative body approving such a measure. Typically, moratoriums are short-term (18-24 months) and allow a planning body to address specific issues that are being raised regarding a specific planning issue. In the case of this alternative, commenters suggest that the County should halt progress on implementation of the CAP until such time that it can conduct a study and define the trans-regional emissions generated by wine distribution and tourism. It is opined that study of these emissions would be appropriate in the context of local County GHG emission estimates and ultimate reductions to be achieved as part of the CAP.

The issue of trans-regional emissions is not new and has been appropriately considered by the County in the context of scoping the CAP. As part of that process, the County’s consultant submitted a memo to the Governor’s Office of Planning and Research (OPR) on October 1, 2019 that discussed the appropriateness of evaluating a worldwide setting in local climate planning efforts to account for global vehicle miles traveled (VMT) and transportation activities associated with land use decisions made by the County. In that memo, it was discussed that it would be inappropriate for local agencies to set, evaluate, and plan for emissions generated in a worldwide setting because it would be too remote and speculative to do so. The County engaged in discussions with OPR staff to discuss the contents of the memo and ultimately received confirmation of understanding from OPR. Ultimately, the reasons supporting why a trans-regional analysis is not appropriate include; 1) the County has local discretion to choose the methodology of its analysis as part of its administrative duties under CEQA, and 2) the CEQA Guidelines provide guidance that a lead agency should inventory and mitigate GHG emission “within a defined geographical area” which is typically the “city or unincorporated county over which they have land use authority.”

Because this alternative would temporarily halt new wineries and tourism expansion and the State and the County are on track to meeting 2020 GHG reduction targets, it is likely that the County would remain on track to meet its 2020 GHG emissions target. However, without implementation of emissions reduction strategies and measures identified in the CAP that would apply to existing development, it is highly unlikely that County could continue to feasibly reduce GHG emissions beyond those reductions that would come from legislative requirements for existing development. A moratorium would only further delay the progress the county has made towards implementing a plan that sets a path towards meeting 2020 and 2030 State legislative requirements. This delay could jeopardize the ability of the County to meet these targets and could result in conflicts with State and local air quality plans and policies. Further, without implementation of a CAP, the County would be in direct conflict with Policy CON-65 (as proposed to be amended) that would require all discretionary projects to comply and be consistent with a countywide CAP. Finally, the County has adopted policies through its General Plan that provide for the orderly growth and planned development of unincorporated areas. To implement a development moratorium would conflict with existing adopted plans and policies that plan for growth. Further, limiting new development would also limit the economic funding sources that allow for funding of necessary County services.

Finally, growth controls such as those suggested by the commenters would be in direct conflict with several goals and policies of the General Plan that are seeking to balance the jobs/housing ratios and provide more affordable housing consistent with the County’s Regional Housing Needs Assessment (RHNA) obligations. In consideration of this, the County has determined this alternative is infeasible and has rejected it from further evaluation in this Draft EIR.

6.3.2 Alternative Location

The County’s CAP is a programmatic approach to reduce GHG emissions within the County’s jurisdiction in accordance with State GHG emissions reduction targets. The CAP accomplishes this by adopting strategies and measures that reduce GHG emissions. These strategies and measures would apply to all land within the County’s jurisdiction and would not be limited to one area or property. Therefore, an alternative site where the project could be implemented would not be feasible or appropriate because the County only has