I. INTRODUCTION
1. These California Environmental Quality Act (Pub. Res. Code § § 21000 et seq., "CEQA") findings are adopted by the City of St. Helena as lead agency, for the City of St. Helena 2040 General Plan Update ("the Plan"). These findings pertain to Environmental Impact Report SCH #2010042001 prepared for the Plan.
2. These CEQA findings are Exhibit A and are incorporated by reference into each and every resolution approving the Plan. Exhibit B is the Mitigation Monitoring and Reporting Program (MMRP). All Exhibits are incorporated by reference into each other and into the resolution to which the Exhibit is attached.
3. The statements, findings, determinations, and other actions set forth in this Exhibit are based on the substantial evidence contained in the entire record before the City. References to specific reports and specific pages of documents are not intended to identify those sources as the exclusive basis for the findings.

II. THE PLAN
4. The Plan is the St. Helena 2040 General Plan Update (Plan or Project) analyzed under CEQA, which addresses growth and preservation within the City of St. Helena to the horizon year of 2040. The Plan replaces the existing 1993 General Plan. The Plan referred to in these findings is the Plan as approved by the St. Helena City Council on May 14, 2019.
5. The Plan is a document to be adopted by the City Council that serves the following purposes:
   (a) Establish a long-range vision that reflects the aspirations of the community and outlines steps to achieve this vision;
   (b) Establish long-range development policies that will guide City departments, Planning Commission, and City Council decision-making;
   (c) Provide a basis for judging whether specific development proposals and public projects are in harmony with plan policies;
   (d) Plan in a manner that meets future land needs based on the projected population and job growth;
   (e) Allow City departments, other public agencies, and private developers to design projects that will enhance the character of the community, preserve environmental resources, and minimize hazards; and
   (f) Provide the basis for establishing and setting priorities for detailed plans and implementing programs, such as the Zoning Ordinance, subdivision regulations, specific and master plans, and the Capital Improvement Program.
6. The Plan provides the basis for the City’s land use and development policy and represents the basic community values, ideals, and aspirations that will govern
development and conservation through the planning horizon year of 2040. Specific objectives established for the Plan include the following:

(a) Encourage infill development in previously developed areas of the city to preserve agricultural and open space lands outside the urban limit line and foster a compact development pattern;
(b) Focus future development so that it is contiguous to existing developed areas and supports efficient delivery of public services and infrastructure;
(c) Preserve St. Helena’s small-town character;
(d) Protect local historic resources and preserve St. Helena’s agricultural heritage;
(e) Reduce traffic congestion by providing alternative transportation choices, enhancing regional public transit connections, and achieving an appropriate jobs-to-housing balance to reduce commuter trips;
(f) Protect and enhance the natural resources—including the riparian corridors, woodlands, flora, and fauna—that contribute to St. Helena’s healthy environment, scenic beauty, and quality of life;
(g) Strengthen St. Helena’s role as a rural commercial and business center serving the daily needs of local residents in town and in the surrounding unincorporated communities;
(h) Cultivate a healthy and diverse local economy;
(i) Promote sustainable, low-impact tourism that contributes to the local economy while maintaining St. Helena’s character;
(j) Provide a high-quality network of parks, open spaces, and trails that enhances quality of life and connectivity in the community; and
(k) Foster a vibrant arts community that contributes to the local economy and enriches the cultural life of the community.

III. PROCEDURAL COMPLIANCE WITH CEQA AND ENVIRONMENTAL REVIEW OF THE PLAN

7. Pursuant to CEQA and the State CEQA Guidelines (Cal. Code Regs title 14, §§ 15000 et seq, the City determined that an Environmental Impact Report (EIR) would be prepared. The NOP for the EIR was published on April 2, 2018, notifying State and local agencies and members of the public of the 30-day public scoping period and public Scoping Meeting. The EIR Scoping Meeting was conducted by the Planning Commission on April 17, 2018 to receive comments and suggestions on scope and content for the EIR; solicit input on potential impacts, mitigation measures, and alternatives to consider; and consult with public agencies responsible for natural resources, other regulatory bodies, neighboring communities, Native American tribes, and members of the public. The scoping period ended on May 1, 2018. The NOP and comments on the NOP received by the City are included as Appendix A of the EIR. A summary of scoping comments is included as Appendix B of the EIR.

8. A Draft EIR was prepared for the Plan to analyze its environmental effects. The EIR for the Plan assesses potential environmental impacts of the Plan in the areas of aesthetics; agricultural resources; air quality; biological resources; cultural, historic, and tribal cultural resources; energy, greenhouse gases, and climate change; geology and soils; hazards and hazardous materials; hydrology and water quality; land use, population, and housing; noise; public services and recreation; transportation; and
utilities and service systems. The EIR also considers growth-inducing impacts, significant irreversible environmental changes, and cumulative impacts. The NOP, comments on the NOP, and scoping comments are included as Appendices A and B of the Draft EIR. Appendices C through I provide further documentation of data and outreach utilized in the Draft EIR impact analyses.

9. The Draft EIR was circulated for public review and comment between October 23, 2018 and January 2, 2019. The City of St. Helena Planning Commission held a regular Planning Commission meeting to receive comments on the Draft EIR on December 4, 2018. The City received written and oral comments on the Draft EIR. The City prepared responses that evaluated the comments on environmental issues and made any necessary additions and revisions to the Draft EIR. The comments, responses to the comments, changes to the Draft EIR, and additional information were published in the Final EIR, including Comments and Responses, dated March 19, 2019.

10. The Planning Commission held a public hearing at regular Planning Commission meeting to review and hear public comment on the Final EIR on March 19, 2019. Subsequently, the Planning Commission held another public hearing at a regular meeting on April 16, 2019, to recommend certification of the EIR and adoption of the Plan.

11. The City Council held a properly noticed public hearing on the Final EIR (consisting of the Draft EIR dated October 23, 2018 and the Comments and Responses dated March 19, 2019) on May 14, 2019. The City certified the Final EIR and adopted the Plan on May 14, 2019. The Draft EIR and Final EIR comprise the "EIR" referenced in these findings.

12. The EIR provides a program-level analysis of the environmental impacts of the Plan and supports all levels of approval necessary to implement the Plan.

IV. THE RECORD

13. The record upon which all findings and determinations related to the Plan are based includes the following:

(a) The preliminary scoping documents and draft versions of and the EIR and all documents referenced in or relied upon by the EIR.

(b) All information (including written evidence and testimony) provided by City staff and consultants to the Planning Commission and City Council, relating to the EIR, the proposed approvals for the Plan, the Plan, and alternatives to the Plan.

(c) All information (including written evidence and testimony) provided to the City or presented at any and all public hearings related to the EIR and the Plan, and all information incorporated into reports presented to any of the public bodies that conducted hearings on the EIR or the Plan.

(d) For documentary and information purposes, all locally adopted land use plans and ordinances, including, without limitation, general plans, specific plans, and related ordinances, together with any related environmental review documents, findings, mitigation monitoring programs and other documentation relevant to the Plan.

(e) The Mitigation Monitoring and Reporting Program for the Plan.

(f) All other documents comprising the record pursuant to Public Resources Code section 21167.6(e).
The custodian of the documents and other materials that constitute the record of proceedings on which the City's decision is based is Planning and Community Improvement Director Noah Housh, or designee. Such documents and other materials are located at City Hall, 1480 Main Street, St. Helena, California 94574.

V. CERTIFICATION OF THE EIR

15. In accordance with CEQA and the CEQA Guidelines, the City certifies that the EIR has been completed in compliance with CEQA and was presented to the Planning Commission and the City Council. The City has reviewed and considered the information contained in the record and the EIR prior to certifying the EIR and approving or recommending approval of any aspect of the Plan. Preparation of the EIR was overseen by the City and the conclusions and recommendations in the EIR reflect the City’s independent judgment and analysis as well as its conclusions and recommendations. By these findings, the City confirms and adopts the findings of the EIR as supplemented by these findings.

16. The City recognizes that the EIR may contain clerical errors and bases its determination on the substance of the information in the EIR.

17. The City certifies that the EIR complies with CEQA and is adequate to support the approval of the Plan, each alternative in the EIR, and variations on the range of alternatives evaluated in the EIR, each component of these alternatives, and any minor modifications to the Plan or the alternatives. The EIR is adequate for approval of the Plan, and any future discretionary approvals required or anticipated by the Plan. The EIR is adequate to support the Plan as approved by the City Council at the May 14, 2019 hearing on the Plan. Conditions imposed by the City Council will enhance the social, economic, and environmental benefits of the Plan and will not have any adverse physical impacts.

VI. FINDINGS ON DISAGREEMENT AMONG EXPERTS AND ABSENCE OF SIGNIFICANT NEW INFORMATION

18. To the extent the comment letters and correspondence submitted by the public or outside agencies or organizations are considered expert opinion, the City Council finds that the assumptions, data, methodology, and analysis included in the EIR (not including the comment letters) prepared by the City and its consultants, is supported by substantial evidence and was the appropriate assumption, data, methodology, and analysis to use to support the impact analysis and conclusions reached in the EIR.

19. The City recognizes that the EIR incorporates information obtained and produced after the Draft EIR was completed, and that the EIR contains additions, clarifications, and modifications. The City has reviewed and considered the Final EIR, and all of this information. The Final EIR does not add significant new information to the Draft EIR that would require recirculation of the EIR under CEQA. The new information added to the EIR does not involve a new significant environmental impact, a substantial increase in the severity of an environmental impact, or a feasible mitigation measure considerably different from others previously analyzed that would clearly lessen the significant environmental impacts of the Plan. No information indicates that the Draft EIR was inadequate or conclusory or that the public was deprived of a meaningful opportunity to review and comment on the Draft EIR.
20. Based on the above finding, the City finds that the changes and modifications made to the EIR after the Draft EIR was circulated for public review and comment do not individually or collectively constitute significant new information within the meaning of Public Resources Code section 21092.1 or CEQA Guidelines section 15088.5 and that recirculation of the EIR is neither necessary nor required.

VII. MITIGATION MONITORING AND REPORTING PROGRAM
21. Public Resources Code section 21081.6 and CEQA Guidelines section 15097 require the City to adopt a monitoring or reporting program to ensure that the mitigation measures for the Plan identified in the EIR are implemented. The Mitigation Monitoring and Reporting Program ("MMRP") is included in Exhibit B and is hereby adopted by the City. The MMRP is consistent with and satisfies the requirements of CEQA.
22. The mitigation measures set forth in the MMRP are specific and enforceable. As appropriate, some mitigation measures define performance standards to ensure no significant environmental impacts will result. The MMRP adequately describes implementation procedures, monitoring responsibility, reporting actions, compliance schedule, non-compliance sanctions, and verification of compliance in order to ensure that the Plan complies with the adopted mitigation measures. The MMRP ensures that the mitigation measures are in place, as appropriate, throughout the life of the Plan.
23. The mitigation measures contained in the MMRP will be imposed as enforceable conditions of approval of the Plan, primarily by requiring policy and program text changes in the General Plan Update, and individual development proposals to be approved by the City as the Plan is implemented. The City has adopted measures to substantially lessen or eliminate all significant effects where feasible.
24. The mitigation measures contained in the MMRP will not have new significant environmental impacts that were not analyzed in the EIR. In the event a mitigation measure recommended in the EIR has been inadvertently omitted from the MMRP, that mitigation measure is adopted and incorporated from the EIR into the MMRP by reference and adopted as part of the MMRP.

VIII. FINDINGS REGARDING ENVIRONMENTAL IMPACTS
25. In accordance with Public Resources Code section 21081 and CEQA Guidelines sections 15091 and 15092, the City adopts the findings and conclusions regarding the impacts and mitigation measures that are set forth in the EIR. These findings do not repeat the full discussions of environmental impacts contained in the EIR. The City ratifies, adopts, and incorporates the analysis, explanation, findings, responses to comments, and conclusions of the EIR. The City adopts the reasoning of the EIR, staff reports, and presentations provided by the staff as may be modified by this Resolution.
26. The City recognizes that the environmental analysis of the Plan raises controversial environmental issues, and that a range of technical and scientific opinion exists with respect to those issues. The City has, through review of the evidence and analysis presented in the record, considered the full scope of the environmental issues presented. These findings are based on a full appraisal of all viewpoints expressed.
and evidence presented in the EIR and in the record, as well as other relevant information in the record of the proceedings for the Plan.

**Less than Significant Impacts or No Impacts**

27. Under Public Resources Code section 21081(a)(1) and CEQA Guidelines sections 15091(a)(1) and 15092(b), the City determines that the following potential impacts would not occur or would be less than significant, as defined by the EIR:

(a) **Aesthetics:** The following impacts were found to be less than significant:
   (i) **Impact 3.1-1:** Implementation of the Plan would not have a substantial adverse effect on scenic vistas.
   (ii) **Impact 3.1-2:** Implementation of the Plan would not substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway.
   (iii) **Impact 3.1-3:** Implementation of the Plan would not substantially degrade the existing visual character or quality of St. Helena and its surroundings.
   (iv) **Impact 3.1-4:** Implementation of the Plan would not create new sources of substantial light or glare that could adversely affect day- or night-time views in the area.

(b) **Agricultural Resources:** The following impacts were found to be less than significant:
   (i) **Impact 3.2-2:** Implementation of the Plan would not conflict with existing zoning for agricultural use or a Williamson Act contract.
   (ii) **Impact 3.2-3:** Implementation of the Plan would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use.

(c) **Air Quality:** The following impacts were found to be less than significant:
   (i) **Impact 3.3-1:** Development under the Plan would not conflict with or obstruct the implementation of the applicable air quality plan.
   (ii) **Impact 3.3-5:** Development under the Plan would not create objectionable odors affecting a substantial number of people.

(d) **Biological Resources:** The following impacts would not occur or were found to be less than significant:
   (i) **Impact 3.4-1:** Implementation of the Plan would not have a substantial adverse effect, either directly or through habitat modifications, on species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.
   (ii) **Impact 3.4-2:** Implementation of the Plan would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service.
   (iii) **Impact 3.4-3:** Implementation of the Plan would not have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.
(iv) **Impact 3.4-4:** Implementation of the Plan would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

(v) **Impact 3.4-5:** Implementation of the Plan would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

(vi) **Impact 3.4-6:** Implementation of the Plan would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.

(e) **Cultural, Historic, and Tribal Cultural Resources:** The following impacts were found to be less than significant:

(i) **Impact 3.5-1:** Implementation of the Plan would not cause a substantial adverse change in the significance of a historical resource, as defined as physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historic resource would be materially impaired.

(ii) **Impact 3.5-2:** Implementation of the Plan would not cause an adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5.

(iii) **Impact 3.5-3:** Implementation of the Plan would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

(iv) **Impact 3.5-4:** Development allowed by the Plan would not have the potential to disturb human remains, including those interred outside of formal cemeteries.

(v) **Impact 3.5-5:** Implementation of the Plan could cause an adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is: (a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or (b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

(f) **Energy, Greenhouse Gases, and Climate Change:** The following impacts were found to be less than significant:

(i) **Impact 3.6-3:** Development under the Plan would not cause wasteful, inefficient, and unnecessary consumption of energy during project construction, operation, and/or maintenance.

(ii) **Impact 3.6-4:** The Plan would not conflict with the CBC Energy Efficiency Standards, the CARB passenger vehicle GHG emission reduction targets for 2020 and 2040, or any other applicable energy conservation regulations.
(g) Geology, Soils, and Seismicity: The following impacts were found to be less than significant:

(i) **Impact 3.7-1**: Implementation of the Plan would not expose residents, visitors and employees, as well as public and private structures, to substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault; strong seismic ground shaking; seismic-related ground failure, including liquefaction; or landslides.

(ii) **Impact 3.7-2**: Implementation of the Plan would not result in substantial soil erosion or the loss of topsoil.

(iii) **Impact 3.7-3**: Implementation of the Plan would not result in development located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Plan, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.

(iv) **Impact 3.7-4**: Implementation of the Plan would not locate structures on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.

(v) **Impact 3.7-5**: Implementation of the Plan would not locate structures on soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.

(h) Hazards and Hazardous Materials: The following impacts would not occur or were found to be less than significant:

(i) **Impact 3.8-1**: Development under the Plan would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

(ii) **Impact 3.8-2**: Development under the Plan would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

(iii) **Impact 3.8-3**: Development under the Plan would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

(iv) **Impact 3.8-4**: Development under the Plan would not result in a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (the “Cortese List”) and, as a result, create a significant hazard to the public or the environment.

(v) **Impact 3.8-5**: Development under the Plan would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

(vi) **Impact 3.8-6**: Future development allowed under the Plan would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

(vii) **Impact 3.8-7**: Development under the Plan would not result in a safety hazard for people residing or working within an airport land use compatibility
plan area or, where such a plan has not been adopted, within two miles of a public airport or public use airport or in close proximity to a private air strip.

(i) **Hydrology and Water Quality:** The following impacts were found to be less than significant:

(i) **Impact 3.9-1:** Development under the Plan would not violate any federal, state, or local water quality standards or waste discharge requirements.

(ii) **Impact 3.9-2:** Development under the Plan would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted).

(iii) **Impact 3.9-3:** Development under the Plan would not substantially alter the existing drainage pattern of the City of St. Helena, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion, siltation, or flooding on- or off-site.

(iv) **Impact 3.9-4:** Development under the Plan would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

(v) **Impact 3.9-5:** Development under the Plan would not substantially degrade water quality.

(vi) **Impact 3.9-7:** Development under the Plan would not place within a 100-year flood hazard area structures which would impede or redirect flood flows.

(vii) **Impact 3.9-8:** Development under the Plan would not expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam.

(viii) **Impact 3.9-9:** Development under the Plan would not result in inundation by seiche, tsunami, or mudflow.

(j) **Land Use, Population, and Housing:** The following impacts would not occur or were found to be less than significant:

(i) **Impact 3.10-1:** Implementation of the Plan would not physically divide an established community.

(ii) **Impact 3.10-2:** Implementation of the Plan would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Plan (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.

(iii) **Impact 3.10-3:** Implementation of the Plan would not conflict with any applicable habitat conservation plan or natural community conservation plan.

(iv) **Impact 3.10-4:** Implementation of the Plan would not induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).

(v) **Impact 3.10-5:** Implementation of the Plan would not displace substantial numbers of existing housing or people, necessitating the construction of replacement housing elsewhere.
(k) **Noise:** The following impacts would not occur or were found to be less than significant:

(i) **Impact 3.11-1:** Implementation of the Plan would not expose persons to or generate noise levels in excess of the noise standards established in the proposed General Plan Noise Element or applicable standards of other agencies.

(ii) **Impact 3.11-3:** The development of the Plan would result in a substantial permanent increase in ambient noise levels above levels existing without the Proposed Plan.

(iii) **Impact 3.11-4:** The development of the Plan would not result in a substantial temporary or periodic increase in ambient noise levels above levels existing without the Proposed Plan.

(iv) **Impact 3.11-5:** The Plan would not expose people residing or working in the Planning Area to excessive noise levels related to its location within two miles of a public airport or public use airport.

(v) **Impact 3.11-6:** The Plan would not expose people residing or working in the Planning Area to excessive noise levels related to its location due to the lack of close vicinity of a private airstrip.

(l) **Public Services and Recreation:** The following impacts were found to be less than significant:

(i) **Impact 3.12-1:** Implementation of the Plan would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection, police protection, schools, parks, or other public facilities.

(ii) **Impact 3.12-2:** Implementation of the Plan would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

(iii) **Impact 3.12-3:** Implementation of the Plan would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

(m) **Traffic and Transportation:** The following impacts were found to be less than significant:

(i) **Impact 3.13-2:** Implementation of the Plan would not conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.

(ii) **Impact 3.13-3:** Implementation of the Plan would not result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.

(iii) **Impact 3.13-4:** Implementation of the Plan would not substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

(iv) **Impact 3.13-5:** Implementation of the Plan would not result in inadequate emergency access.
(v) Impact 3.13-6: Implementation of the Plan would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

(n) Utilities and Service Systems: The following impacts were found to be less than significant:

(i) Impact 3.14-1: Potential development that could be allowed under the Proposed Plan would not exceed wastewater treatment requirements of the San Francisco Regional Water Quality Control Board.

(ii) Impact 3.14-2: Potential development that could be allowed under the Proposed Plan would not require construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

(iii) Impact 3.14-3: Potential development that could be allowed under the Proposed Plan would not require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

(iv) Impact 3.14-4: Potential development that could be allowed under the Proposed Plan would have sufficient water supplies available to serve the Plan from existing entitlements and resources and would not require new or expanded entitlements.

(v) Impact 3.14-5: Potential development that could be allowed under the Proposed Plan would not result in a determination by the wastewater treatment provider that it has inadequate capacity to serve the projected demand in addition to the provider’s existing commitments.

(vi) Impact 3.14-6: Potential development that could be allowed under the Proposed Plan would be served by a landfill with sufficient capacity to accommodate the Plan’s solid waste disposal needs.

(vii) Impact 3.14-7: Potential development that could be allowed under the Proposed Plan would comply with federal, state, and local statutes or regulations related to solid waste.

(o) Forestry Resources: The following impacts would not occur:

(i) Implementation of the Plan would not conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)).

(ii) Implementation of the Plan would not result in the loss of forest land or conversion of forest land to non-forest use.

(iii) Implementation of the Plan would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use.

(p) Mineral Resources: The following impacts would not occur:

(i) Implementation of the Plan would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.
(ii) Implementation of the Plan would not result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan.

Significant but Mitigable Impacts
28. Under Public Resources Code section 21081(a)(1) and CEQA Guidelines sections 15091 (a)(1) and 15092(b), and to the extent reflected in the EIR, the City finds that changes or alterations have been required in, or incorporated into, the Plan that mitigate to a less than significant level or avoid the following potentially significant effects on the environment:

(a) Air Quality, Impact 3.3-4: Development under the Plan would expose sensitive receptors to substantial pollutant concentrations.

(i) Facts in Support of Finding: The EIR assessed the potential for the Plan to expose sensitive receptors to substantial concentrations of CO, asbestos, and toxic air contaminants (TACs). It found that the Plan did not have the potential to substantially increase CO hotspots or potential exposure to asbestos, but that it could, through construction and operation, increase exposure of sensitive receptors to TACs.

(ii) Effects of Proposed General Plan Policies and Remaining Impacts: There are no additional feasible policies that would further reduce impacts from construction. Policies within the Proposed Plan (Policy LU4.1 and implementation actions LU4.C, LU5.F, and LU5.H) require buffers and transitional zones between existing and potential sources of TACs and PM and commit the City to evaluating the compatibility of industrial uses between SR-29 and Crane Avenue. These policies would help to reduce impacts from operational sources of pollutants from some stationary sources, such as industrial and agricultural uses. However, the proposed policies do not specifically address the potential effects of stationary sources other than industrial or agricultural uses and do not provide criteria for measuring the effectiveness of required buffers. Therefore, the Proposed Plan alone could not guarantee that impacts would be reduced below a level of significance.

(iii) Rationale and Conclusion: The Plan would allow growth of new residential land uses that would be sensitive receptors and new non-residential land uses that are a potential for new emissions sources. Typically, these sources would be evaluated through the BAAQMD permit process and/or the CEQA process to identify and mitigate any significant exposures. Additionally, policies within the Proposed Plan aim to establish buffers between potential air pollution sources and sensitive receptors, as well as limit pollution during construction. This impact will be mitigated through imposition of Mitigation Measures AQ-1, AQ-2, AQ-3, AQ-4, AQ-5, and AQ-6, which require implementation of the following actions:

- **AQ-1:** Require construction projects in the City of St. Helena to implement BMPs to reduce fugitive dust emissions. BMPs may include:
  - Watering all exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) three times per day using recycled water.
Covering all haul trucks transporting soil, sand, or other loose material.

Removing all visible mud or dirt track-out onto adjacent public roads using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.

Limiting all vehicle speeds on unpaved roads to 15 mph.

Completing all roadways, driveways, and sidewalks to be paved as soon as possible. Laying building pads soon as possible after grading unless seeding or soil binders are used.

Minimizing idling times either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.

Maintaining and properly tuning all construction equipment in accordance with manufacturer’s specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper working condition prior to operation.

Staging construction equipment as far as possible from existing sensitive receptors (away from the southeast property line and surrounding residences).

Posting a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District’s phone number shall also be visible to ensure compliance with applicable regulations.

Where warranted, the project sponsors shall incorporate the following language into construction specifications if significant risk is anticipated based on design level construction schedule, duration and concurrent construction activities:

- Powering portable equipment by electricity if available or if electricity is not available, using propane or natural gas if feasible. Diesel engines shall only be used if electricity is not available and it is not feasible to use propane or natural gas.

- Ensuring that all mobile diesel-powered off-road equipment larger than 25 horsepower and operating on the site for more than two days continuously or 20 hours cumulative meets, at a minimum, U.S. EPA particulate matter emissions standards for Tier 2 engines or equivalent and be equipped with diesel particulate matter filters that meet CARB-certified Level 2 or 3 Diesel Particulate Filters. Alternatively-fueled equipment (i.e., non-diesel) would meet this requirement.
• **AQ-2:** Require that applicants proposing development of projects within the City of St. Helena require contractors, as a condition of contract, to reduce construction-related fugitive ROG emissions by ensuring that low-VOC coatings that have a VOC content of 10 grams/liter (g/L) or less be used during construction. All project applicants shall submit evidence of the use of low-VOC coatings to the City of St. Helena and/or the BAAQMD (as applicable) prior to the start of construction.

• **AQ-3:** Require all development applications with the potential to create point-source air quality impacts be referred to the Bay Area Air Quality Management District (BAAQMD) for review and comment to ensure compliance with BAAQMD requirements prior to approval of the project.

• **AQ-4:** Require development projects to meet CARB setback recommendations from air contaminant sources for sensitive uses or conduct specific air quality and health risk impact analyses and identify project specific mitigation measures.

• **AQ-5:** To protect sensitive receptors require discretionary projects in proximity to Highway 29, Silverado Trail and the Rail Corridor to include an analysis of mobile source toxic air contaminant health risks. The analysis, if necessary, shall identify feasible mitigation measures to reduce health risks to acceptable levels.

• **AQ-6:** All applicants proposing development of projects within 1,000 feet of existing sensitive receptors, as defined by BAAQMD, shall prepare a site-specific construction health risk assessment (HRA) taking into account both project-level and cumulative health risks (including existing TAC sources). If the HRA demonstrates, to the satisfaction of the City, that the health risk exposures for adjacent receptors will be less than BAAQMD project-level and cumulative thresholds (as appropriate), then additional mitigation would be unnecessary. However, if the HRA demonstrates that health risks would exceed BAAQMD project-level and/or cumulative thresholds (as appropriate), additional feasible on- and offsite mitigation shall be analyzed by the applicant to help reduce risks to the greatest extent practicable.

With the implementation of these mitigation measures, which set specific buffers between land uses as recommended by CARB and BAAQMD, as well as additional studies for projects located along SR-29 and Silverado Trail, impacts would be reduced to a less than significant level.

**(b) Hydrology and Water Quality, Impact 3.9-6:** Implementation of the General Plan Update would place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map.

(i) **Facts in Support of Finding:** Implementation of the Plan could result in development on sites partially or fully within the 100-year flood zone and could involve construction of new housing as part of residential or mixed-use projects within flood hazard zones (see EIR Figure 3.9-5: Land Use Change Areas and Flood Zones). Change Area 4, designated as Mixed-Use and Public and Quasi-Public, falls completely within the 100-flood hazard. Most of its Mixed-Use
portion, and some of its Public and Quasi-Public portion, also fall within the regulatory floodway. Change Area 5, designated as Mixed-Use, falls primarily within the 100-year flood hazard zone. It also overlaps slightly with the floodway. Other sites have less overlap with the 100-year flood hazard. Change Area 2, designated as Mixed-Use, and Change Area 3, designated as High Density Residential, fall partially within the 100-year flood hazard and have no overlap with the regulatory floodway. Change Area 6, designated as Mixed-Use, and Change Area 7, designated as Medium Density Residential, each have small portions of their sites designated as within the 100-year flood hazard, and no land area within the floodway. Further, some of the Key Opportunity Sites for constructing medium and high-density housing identified in the City’s Housing Element have a risk of flooding: Sites 6 and 7 are adjacent to and partially within the regulatory floodway and a portion of Site 9 falls within the 100-year flood hazard. Development on these sites would constitute a potentially significant impact.

(ii) Effects of Proposed General Plan Policies and Remaining Impacts: Many policies within the Plan would help to mitigate any risks involved with development in flood risk areas. Some policies would ensure compliance with existing federal and local regulations. The Proposed Plan limits urban development in designated Flood Hazard Areas to that which complies with FEMA’s regulations (OS1.N and PF5.E) and would ensure that the City’s flood hazard regulations are in accordance with FEMA/National Flood Insurance Program regulations and reflect best practices (PS5.F). Change Areas 2, 3, 5, 6, and 7 and Housing Opportunity Site 9 all have some degree of overlap with the 100-year flood hazard zone; any development within the flood hazard areas would be required to comply with FEMA regulations, the St. Helena Municipal Code, and the Plan’s policies for properties in flood risk zones described above, thereby minimizing the potential for loss, damage or injury to the maximum extent practicable. This and any other new development and redevelopment pursuant to the Proposed Plan would be required to comply with all flood protection provisions in the Municipal Code. Setbacks would be established along streambeds to protect the riparian corridors and all development would take place outside of the stream corridor (OS1.N). Other policies in the Plan would mitigate against actions that could impede or redirect flood flows by ensuring that base flood elevations do not increase and that development activities do not expand the floodplain (OS2.6, PF3.2, PF3.3, PS5.2, PS5.4, PS5.5, PS5.A, and PS5.C).

The Proposed Plan would prohibit new development within the floodway (PF5.5 and PF5.E) and prohibit creation of new residential lots that would be subject to periodic inundation by floodwaters by requiring building floor elevations to comply with the Municipal Code’s required elevations above base flood level (PF3.C). Further, it would ensure that any new development complies with FEMA and State Department of Water Resources standards (PS5.1) and encourages leaving open spaces within the 100-year floodplain (PS5.3). It would also support flood management by encouraging open space uses within Special Flood Hazard Areas consistent with Living River Principles, including maintaining or restoring geomorphic equilibrium, maintaining natural slopes and channel widths,
maintaining the connection of the river or creek to its floodplain, and providing adequate development setbacks to allow the river or creek to meander (PS5.3 and OS2.6). The Plan would also provide for flood protection measures for lands adjacent to York Creek, Sulphur Creek, and the Napa River (PF3.3, PF3.A and PS5.B).

Therefore, while implementation of the Plan could lead to housing within the 100-year flood hazard area, adherence to FEMA standards, the St. Helena Municipal Code, and to applicable Plan policies would reduce the risks with respect to placement of people or structures within the 100-year flood hazard area to the maximum extent practicable. However, development within the floodway, including construction of housing, would constitute a significant risk, as FEMA designates these as channels which should flood regularly and provide unimpeded conveyance for floodwaters during a typical large storm event. Development within the floodway-designated portions of Change Areas 4 and 5 and Housing Opportunity Sites 6 or 7 would result in a significant impact.

(iii) Rationale and Conclusion: The EIR includes Mitigation Measure HYDRO-1 to mitigate impacts related to development within the floodway-designated portions of Change Areas 4 and 5 and Housing Opportunity Sites 6 or 7.

- **HYDRO-1:** Any proposed development or redevelopment on land designated as regulatory floodway on current FEMA maps shall, prior to issuance of a construction permit, obtain and submit to the City a Letter of Map Revision (LOMR) from FEMA, demonstrating that a hydrologic and hydraulic analysis showed that grading modifications were performed such that the proposed development would no longer be within the floodway. These modifications shall be completed without raising the base flood level or impacting other properties.

Compliance with Mitigation Measure HYDRO-1 would ensure that no development impedes waters in the floodway, raises base flood levels, or exposes housing to undue risk from flooding. Impacts would be reduced to a less than significant level with mitigation.
(c) Noise, Impact 3.11-2: Implementation of the General Plan Update would expose people to or generate excessive groundborne vibration or groundborne noise levels.

(i) Facts in Support of Finding: Future and existing development adjacent to construction sites could be exposed to excessive groundborne vibration temporarily (i.e. vibration that is distinctly perceptible). A pile driver, a hoe ram or large bull dozer (which generates vibration levels similar to an excavator), and loaded trucks all have the potential to generate vibration levels greater than the distinctly perceptible level of 0.04 PPV in/sec at a distance of 25 feet. At distances greater than 50 feet, only a pile driver (impact or vibratory/sonic) would be expected to generate distinctly perceptible vibration. An impact pile driver could create distinctly perceptible vibration (0.04 PPV in/sec) at distances of up to approximately 300 feet, and a sonic/vibratory pile driver could generate distinctly perceptible vibration at distances of up to 175 feet.

As construction equipment operating within 25 feet of sensitive land uses could generate distinctly perceptible vibration, non-pile driving construction activities occurring within 25 feet of sensitive uses could result in significant vibration impacts. In addition, pile driving occurring within approximately 175 feet or 300 feet of sensitive uses for vibratory/sonic pile drivers and impact pile drivers, respectively, could also result in significant vibration impacts. As the specific future projects to be developed under the Proposed Plan are not known at this time, and as the level of construction activity that would occur at various locations for future projects is also not known, it is possible the future construction activities could result in significant vibration impacts in portions of the Planning Area near historic structures and sensitive receptors such as schools and residences.

The City’s Noise Ordinance would help reduce construction vibration effects at future and existing sensitive land uses by limiting the times at which construction could take place to certain time periods when it would not be a major disturbance to neighbors, including sensitive receptors. However, neither the Noise Ordinance nor the Proposed Plan provide a framework for determining specific construction vibration mitigation measures to ensure that potential vibration impacts are minimized and the impact would be potentially significant.

(ii) Effects of Proposed General Plan Policies and Remaining Impacts: There are no additional feasible policies that would further reduce impacts.

(iii) Rationale and Conclusion: This impact will be reduced to a level of less than significant by the inclusion of Mitigation Measure NO-1 as follows:

- **NO-1**: Where vibration impacts have the potential to cause structural damage or distinctly perceptible human response (reference Tables 3.11-12 to 3.11-14, or more recent sources), require a vibration study, prepared by a qualified vibration consultant. The study should include a site-specific engineering assessment of potential vibration impacts to structures and sensitive receptors from construction activities and specify a mitigation plan to minimize the impacts using all reasonable and feasible means available. The mitigation plan should include a procedure for establishing threshold and limiting vibration values for potentially affected structures, based on an assessment of each structure’s ability to withstand the loads and displacements due to
construction vibrations and a commitment to develop a vibration monitoring plan during the engineering phase and to implement a compliance monitoring program during construction.

With the inclusion of Mitigation Measure NO-1, the potential impact would be reduced to a less-than-significant level.

**Significant and Unavoidable Impacts**

29. Under Public Resources Code section 21081(a)(1) and CEQA Guidelines sections 15091(a)(1) and 15092(b), the City determines that the following significant effects on the environment, as reflected in the EIR, and as mitigated as shown below, remain significant and unavoidable despite the fact that changes or alterations to the Project have been required in, or incorporated into, the Project that avoid or substantially lessen the significant environmental effects identified in the EIR. Further, the City finds that the following significant and unavoidable impacts are acceptable due to the overriding considerations described below. The City also finds that further mitigation measures and a No Project Alternative that may reduce the significance of any of these impacts are rejected as infeasible for the reasons given below.

**(a) Agricultural Resources, Impact 3.2-1:** Implementation of the General Plan Update would convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.

(i) **Facts in Support of Finding:** The largest category of farmland classified by the Farmland Mapping and Monitoring Program (FMMP) in the Planning Area is Prime Farmland, which comprises 900 acres or 29 percent of the land in the city identified as agriculture by the FMMP. Additionally, there are approximately 279 acres of Farmland of Statewide Importance, 75 acres of Farmland of Local Importance, and 38 acres of Unique Farmland in the Planning Area.

The Plan includes various land use designations for areas with Prime, Statewide Important, Unique, and Local Important Farmland. While the General Plan Update would designate large areas along the periphery of the city as Agriculture, where agricultural and agriculturally-related uses would continue to be allowed, it also includes urban land use designations in areas of Prime, Statewide Importance, Unique, and Local Important Farmland, which would allow for new development that would result in farmland conversion. As discussed in Draft EIR Section 3.2: Agricultural Resources, urban land use designations in the Proposed Plan would cover 58 acres of Prime Farmland, 20 acres of Statewide Importance, 2 acres of Unique Farmland, and nearly 37 acres of Farmland of Local Importance. In total, the General Plan Update would allow for development on 118 acres of Prime, Important, or Unique farmland throughout the Planning Area, all located within city limits.

(ii) **Effects of Proposed General Plan Policies and Remaining Impacts:** The General Plan Update policies and implementing actions provide a framework to permit existing agricultural uses to continue operating and ensure that important farmland remains as farming or other related agricultural support uses for as long as such use is financially feasible. Land use policies included within the Plan would serve to reduce impacts to Important Farmland, including LU1.4, which encourages infill development within currently developed areas in order to
minimize the need to expand the Urban Limit Line; and policies LU1.3, LU5.1, CD4.3, OS2.1, and PR3.2, which provide support for agricultural uses within and adjacent to the city. Additionally, implementing actions LU5.B and PS2.H call for continued enforcement of “right-to-farm” provisions. The Final EIR noted the addition of Implementing Action LU5.I to the General Plan Update to further reduce impacts by establishing a Farmland Mitigation Program, in response to a comment on the Draft EIR that requested that the City consider the feasibility of additional measures to mitigate the impact. While these policies would reduce the impact, the potential loss of Prime Farmland, Farmland of Statewide Importance, and Unique Farmland would still be considered significant as Farmland as agricultural land is a finite and irreplaceable resource.

(iii) Rationale and Conclusion: Implementation of the General Plan Update could result in the loss of 118 acres of Prime Farmland, Farmland of Statewide Importance, and Unique Farmland. Conversion of agricultural land to urban use is not directly mitigable, aside from preventing development altogether, as agricultural land is a finite and irreplaceable resource. Beyond limiting the amount of total growth permitted, there are no feasible mitigation measures for agricultural land conversion that would also fulfill the objectives of and implement the General Plan Update. The impact is found to be significant and unavoidable under 14 CCR Section 15091(a)(3). This potential unavoidable significant impact is acceptable and overridden as set forth below in the Statement of Overriding Considerations.

(b) Air Quality, Impact 3.2-2: Development under the General Plan Update would violate air quality standards or contribute substantially to an existing or projected air quality violation.

(i) Facts in Support of Finding: Development under the General Plan Update that would exceed the Bay Area Air Quality Management District’s (BAAQMD’s) regional significance thresholds would contribute to the nonattainment designation of the San Francisco Bay Area Air Basin (SFBAAB), which constitutes an air quality violation. The SFBAAB is currently designated a nonattainment area for State and national ozone ambient air quality standards (AAQS), as well as the State particulate matter (PM$_{2.5}$ and PM$_{10}$) standards. Construction associated with new land use developments under the General Plan Update would result in the temporary generation of ozone precursors (reactive organic gas [ROG] and nitrogen oxides [NOX]), carbon monoxide [CO], and particulate matter emissions. Operational sources under the General Plan Update, including mobile, area, and energy sources, would result in a net increase in criteria pollutant emissions of ROG, PM$_{10}$, and PM$_{2.5}$ and potential violation of ROG and PM$_{10}$ air quality standards.

(ii) Effects of Proposed General Plan Policies and Remaining Impacts: No policies in the General Plan Update would further reduce impacts related to construction; however, the General Plan Update includes numerous policies to reduce criteria air pollutants related to operation of subsequent projects. Policies within the General Plan Update, including PS1.1, PS1.2, and PS1.3, address adhering to air quality standards and reducing air pollution. Additionally, Implementing Action PS1.H calls for the adoption of BAAQMD Guidelines for
Assessing the Impacts of Projects and Plans thresholds of significance for determining the significance of project impacts under CEQA. Implementing Action PS4.J calls for educating the public about the use of green household products in an effort to reduce air pollution, including ROGs. The General Plan Update also includes policies specifically related to the reduction of VMT, which would reduce mobile-source emissions. Policies that reduce VMT address increasing density and maintaining growth within the city’s Urban Limit Line (ULL). Land Use and Circulation policies encourage walking, biking, carpooling, public transit, and other alternatives to single-occupancy automobile use.

(iii) Rationale and Conclusion: The General Plan Update includes policies and implementing actions that would minimize air pollution to the extent feasible. Mitigation Measures AQ-1, AQ-2, and AQ-3 would further reduce ROGs from architectural coating, and particulate matter from construction, as well require all development with the potential to create point-source air quality impacts to receive BAAQMD review prior to approval. Additionally, an analysis of emissions generated from the operation of development allowed under the General Plan Update would be individually compared to BAAQMD’s project-level significance thresholds during individual environmental review. However, the total criteria air pollutant emissions from operation of future development under the General Plan Update is likely to be substantial and could contribute to increases in concentrations of air pollutants, which could contribute to ongoing violations of air quality standards. Because the detail of future projects allowed under the General Plan Update cannot be known at this time, the impact is considered significant and unavoidable. The impact is found to be significant and unavoidable under 14 CCR Section 15091(a)(3). This potential unavoidable significant impact is acceptable and overridden as set forth below in the Statement of Overriding Considerations.

(c) Air Quality, Impact 3.3-3. Development under the General Plan Update would result in a cumulatively considerable net increase of criteria pollutants for which the General Plan region is nonattainment under an applicable federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).

(i) Facts in Support of Finding: Development under the General Plan Update would result in a cumulatively considerable net increase of criteria pollutants for which the General Plan region is nonattainment under an applicable federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors). Criteria air pollutant emissions generated by cumulative development associated with buildout of the General Plan Update (ROG for the City of St. Helena and PM_{10} for the Planning Area) would exceed BAAQMD’s project-level significance thresholds and would contribute to the nonattainment designations of the SFBAAB. The SFBAAB is currently designated as a nonattainment area for California and national ozone AAQS and California PM_{2.5} and PM_{10} AAQS. The comprehensive suite of General Plan policies could reduce the severity of growth-oriented criteria pollutants, relative to conditions without the General Plan Update. Additionally, implementation Mitigation Measures AQ-1, AQ-2, and AQ-3 would ensure that
the construction-related impacts of the General Plan Update on air quality would be reduced to a less-than-significant level. However, operational sources under the General Plan Update would result in a significant and unavoidable and cumulatively considerable air quality impact associated with ROG and PM$_{10}$ emissions. Air pollution is by nature a cumulative impact. No single project by itself would be sufficient in size to result in regional nonattainment of State or national AAQS. Instead, a project’s individual emissions contribute to existing adverse air quality conditions, and together with other past, present, and reasonably foreseeable projects could result in a significant impact. Criteria air pollutant emissions generated by cumulative development associated with buildout of the General Plan Update (ROG for the City of St. Helena and PM$_{10}$ for the Planning Area) would exceed BAAQMD’s project-level significance thresholds and would contribute to the nonattainment designations of the SFBAAB. The SFBAAB is currently designated as a nonattainment area for California and national ozone AAQS and California PM$_{2.5}$ and PM$_{10}$ AAQS. Projects that exceed BAAQMD’s significance thresholds would cumulatively contribute to health impacts in the SFBAAB. Land uses developed under the General Plan Update would increase emissions of ROG, which is an ozone precursor. Emissions of ROG generated by buildout of the General Plan Update could increase photochemical reactions and the formation of tropospheric ozone, which, at certain concentrations, could lead to respiratory symptoms (e.g., coughing), decreased lung function, and inflammation of airways. Although these health effects are associated with ozone, the impacts are a result of cumulative ROG emissions throughout the Bay Area. Accordingly, the incremental contribution of development supported by the General Plan Update to specific health outcomes related to criteria pollutant emissions would be limited. It is also important to note that growth-related emissions associated with the General Plan Update would not occur all at once but would instead occur incrementally over time as regional air quality improves and regulations to reduce emissions take effect.

(ii) Effects of Proposed General Plan Policies and Remaining Impacts: As discussed in the EIR under Impact 3.3-1, the General Plan Update would support the goals of BAAQMD’s 2017 Clean Air Plan, include all applicable control measures, and would not conflict with its implementation. The comprehensive suite of General Plan Update policies could reduce the severity of growth-oriented criteria pollutants, relative to conditions without the General Plan Update. Even with the policies of the General Plan Update, individual development projects allowed under the General Plan Update may still generate construction emissions in excess of BAAQMD’s project-level thresholds.

(iii) Rationale and Conclusion: The Draft EIR includes Mitigation Measures AQ-1, AQ-2, and AQ-3 to ensure that the construction-related impacts of the Proposed Plan on air quality would be reduced to a less-than-significant level. However, operational sources under the General Plan Update would result in a significant and unavoidable and cumulatively considerable air quality impact associated with ROG and PM$_{10}$ emissions. Current nonattainment status and projected ROG and PM$_{10}$ emissions at buildout in combination with past, present,
and reasonably foreseeable projects elsewhere within the SFBAAB demonstrate that the General Plan Update, even with implementation of applicable regulations, would result in a significant and unavoidable cumulative impact with respect to air quality and attainment of such standards. The impact is found to be significant and unavoidable under 14 CCR Section 15091(a)(3). This potential unavoidable significant impact is acceptable and overridden as set forth below in the Statement of Overriding Considerations.

**d) Energy, Greenhouse Gases, and Climate Change, Impact 3.6-1:** Development under the General Plan Update would generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

(i) **Facts in Support of Finding:** Assuming compliance with existing state and local policies and implementation of the General Plan Update’s comprehensive suite of policies, which include efforts to reduce VMT, net operational GHG emissions in 2040 could exceed the efficiency metric of 2.3 MTCO2e per service population calculated in the Methodology and Assumptions section of Draft EIR Section 3.6. To reduce the General Plan Update’s GHG emissions in 2040, Mitigation Measure GHG-1 is recommended:

- **GHG-1:** The City of St. Helena shall adopt and begin to implement a Climate Action Plan within a goal of 18 months, but no later than 36 months, of adopting the Proposed Plan update to address the GHG reduction goals of Executive Order B-30-15 and Executive Order S-03-05 for GHG sectors that the City has direct or indirect jurisdictional control over. The Climate Action Plan shall include a community inventory of GHG emission sources, and quantifiable GHG emissions reduction targets for 2030 and 2050, and an interim target for the General Plan buildout year 2040, that are consistent with the statewide GHG reduction targets. The City shall monitor progress toward its GHG emissions reduction goals and prepare reports every five years detailing that progress.

The adoption and implementation of a Climate Action Plan with specific and quantifiable goals to reduce emissions, as well as indicators to track progress, will help the City reduce the impacts associated with implementation of the General Plan Update. As the transportation sector is the largest source of emissions within the City of St. Helena in 2018 and is projected to remain the largest source in 2040, it has the most opportunity for reductions. Even with implementation of this mitigation measure, however, implementation of the Plan would generate GHG emissions in excess of the 2040 efficiency metric.

Development under the General Plan Update would result in a substantial increase in GHG emissions from baseline conditions by 2040, and would exceed the 2040 efficiency target. This would mean that the General Plan Update does not make substantial progress towards meeting the State’s 2050 goal of an 80 percent reduction from 1990 levels pursuant to EO S-03-05. Additionally, since the significance thresholds are a reflection of emissions reductions needed to meet the 80 percent GHG reduction target as a State, St. Helena’s failure to meet the thresholds may have a cumulative impact on whether or not the State will meet its target.
(ii) **Effects of Proposed General Plan Policies and Remaining Impacts:** Effects of the General Plan Update were factored into the above analysis to the extent that the reduction of GHGs from proposed policies could be quantified. Even accounting for these reductions, emissions levels under the General Plan Update would exceed the significance threshold.

(iii) **Rationale and Conclusion:** Mitigation Measure GHG-1 would require the adoption of a St. Helena Climate Action Plan that lays out a series of goals, policies, and actions to reduce GHG emissions to a level that is consistent with BAAQMD’s efficiency targets and, therefore, State GHG reduction goals. Policies within the Climate Action Plan must set specific targets for GHG reductions where possible (i.e. source a specific percentage of the city’s power through renewable sources, install a specific length of bicycle lanes, or install greywater systems in a specific percentage of homes in St. Helena). However, given that additional State and federal actions are necessary to ensure that State and federally regulated emissions sources (i.e., sources outside the City’s jurisdictional control) are addressed to achieve the 2050 target, and that, at this time, there are no post-2030 State or federal measures in place that would assist the City in achieving the 2040 efficiency target, even with implementation of Mitigation Measure GHG-1, GHG impacts as a result of the General Plan Update are considered significant and unavoidable. The impact is found to be significant and unavoidable under 14 CCR Section 15091(a)(2). This potential unavoidable significant impact is acceptable and overridden as set forth below in the Statement of Overriding Considerations.

(e) **Energy, Greenhouse Gases, and Climate Change, Impact 3.6-2:** Development under the Plan would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

(i) **Facts in Support of Finding:** Assembly Bill (AB) 32 and EO S-03-05 set targets for State GHG reductions of 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050. The 2017 CARB Scoping Plan creates a pathway to achieving those goals by reducing GHG emissions to 4.0 MTCO2e per capita by 2030 and 2.0 MTCO2e per capita by 2050. BAAQMD’s CEQA Guidelines, as discussed in the Methodology and Assumptions section, builds upon the CARB per capita thresholds by creating an efficiency threshold that uses service population in lieu of resident population, which is more appropriate for a land use plan, such as the General Plan Update. Accounting for State and federal standards and for policies within the General Plan Update that can be quantified, the resulting 2040 per capita emissions exceed the significance threshold of 2.3 MTCO2e per service population. This means that, absent additional measures at the State level, development under the General Plan Update would conflict with CARB’s 2017 Scoping Plan, AB 32, EO S-03-05, or BAAQMD’s CEQA Guidelines (as they pertain to meeting the larger State goals for GHG reductions), as the City does not have direct control over certain aspects of transportation emissions, such as vehicle fuel efficiency standards or regional traffic. Meeting the aggressive State GHG reduction goals will require a substantial change in terms of how energy is produced and consumed, as well as
other economy-wide changes, many of which can only be implemented by the State and federal government.

(ii) Effects of Proposed General Plan Policies and Remaining Impacts: Through implementation of the General Plan Update policies aimed at reducing GHG emissions, the General Plan Update would serve to implement numerous strategies and measures aimed at reducing GHG emissions. All of the policies and implementing actions within the Proposed Plan Climate Change Element could potentially decrease St. Helena’s GHG emissions. Additionally, policies in the General Plan Update aim to reduce water use, construct more energy efficient buildings, provide walkable communities, decrease reliance on automobile transportation, and more. GHG-reducing policies and implementing actions can be found in nearly all of the elements in the General Plan Update, including the Land Use and Growth Management, Economic Sustainability, Public Facilities and Services, Circulation, Community Design, Open Space, Public Health, Safety, and Noise, Climate Change, and Parks and Recreation elements. While these policies and implementing actions could reduce GHG emissions, many do not set specific goals or targets for reductions, and therefore cannot be quantified at this time. As stated above, even accounting for the reduction in emissions from General Plan Update policies that can be quantified, the resulting 2040 per capita emissions could exceed the significance threshold.

(iii) Rationale and Conclusion: Implementation of Mitigation Measure GHG-1 would help to reduce conflict with the GHG emissions reduction trajectory for 2050 articulated under EO S-3-05 to the extent practicable and feasible; however, further action is necessary at the State and federal levels to achieve the deep cuts to emissions sources outside the City’s jurisdictional control needed to meet the GHG emissions reductions targets laid out by the State. Given that, at this time, there are no post-2030 State or federal measures that would assist the City in achieving the efficiency target in 2040, even with implementation of Mitigation Measure GHG-1, the potential exists for the Proposed Plan to conflict with applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of GHGs. The impact is found to be significant and unavoidable under 14 CCR sections 15091(a)(2) and 15091(a)(3). This potential unavoidable significant impact is acceptable and overridden as set forth below in the Statement of Overriding Considerations.

(f) Transportation and Traffic, Impact 3.13-1: Implementation of the Plan could result in conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.

(i) Facts in Support of Finding: Potentially significant impacts are identified at seven intersections, as follows:

- **Intersection 8 – Main Street/Pratt Avenue**: Weekday PM peak hour intersection operations would remain at LOS F and the weekday PM peak hour delay would increase by more than five seconds. The Peak Hour Signal Warrant is met at this location for the weekday PM peak hour.
• **Intersection 9 – Main Street/Elmhurst Avenue**: Weekday PM peak hour intersection operations would remain at LOS F and the weekday PM peak hour delay would increase by more than five seconds. The Peak Hour Signal Warrant is met at this location for the weekday PM peak hour.

• **Intersection 18 - Main Street/Pope Street-Mitchell Drive**: Weekday AM peak hour, weekday PM peak hour, and weekend midday peak hour intersection operations would remain at LOS F and the delay would increase by more than five seconds for each peak hour studied.

• **Intersection 19 - Main Street/Grayson Avenue**: While this intersection is projected to operate acceptably per the intersection operations analysis, the results of the Main Street/Pope Street-Mitchell Drive analysis indicate that queues from the Main Street/Pope Street-Mitchell Drive intersection would regularly impede northbound Main Street traffic flow at Main Street/Grayson Avenue. Vehicles making an eastbound left turn from Grayson Avenue to northbound Main Street may need to wait multiple cycles to complete a left turn if there is no room to complete the turn. Therefore, this intersection has been noted as a significant impact.

• **Intersection 20 - Main Street/Sulphur Springs Avenue**: Weekday PM peak hour intersection operations would deteriorate from an existing LOS D to a projected LOS E, and the weekday PM peak hour delay would increase by more than five seconds. The Peak Hour Signal Warrant is met at this location for the weekday PM peak hour.

• **Intersection 26 – Silverado Trail/Pope Street**: Weekday AM peak hour, weekday PM peak hour, and weekend midday peak hour intersection operations would remain at LOS F and the delay would increase by more than five seconds for each peak hour studied. The Peak Hour Signal Warrant is met at this location for all of the indicated peak hours studied.

• **Intersection 27 - Main Street/Mills Lane**: While this intersection is projected to operate acceptably per the intersection operations analysis, the results of the Main Street/Pope Street-Mitchell Drive analysis indicate that queues from the Main Street/Pope Street-Mitchell Drive intersection would regularly impede northbound Main Street traffic flow at Main Street/Mills Lane. Vehicles making a westbound right turn from Mills Lane to northbound Main Street may need to wait for long times for gaps in traffic to open to complete the turn. A similar situation may occur for vehicles making a southbound left turn from Main Street to Mills Lane Therefore, this intersection has been noted as a significant impact.

(ii) **Effects of Proposed General Plan Policies and Remaining Impacts**: The General Plan Update includes multiple policies and implementing actions that would seek to minimize congestion on the transportation network through a series of efforts to reduce single occupancy vehicle trips, improve circulation throughout St. Helena, and promote walking, bicycling and transit trips as viable transportation options. Additionally, The Plan contains multiple implementing actions that identify mechanisms for funding actions designed to alleviate transportation impacts resulting from new development under the General Plan Update. Specifically, Implementing Actions CR1.H and CR1.K provide for the
development of a methodology to measure automobile trips generated (ATG) by new development projects, and the adoption of a citywide, multi-modal Transportation Mitigation Fee program. While the City already has a traffic impact fee program in place, the proposed multi-modal fee program would seek to provide transportation improvements that offset the increase in vehicle trips resulting from new development. The Transportation Mitigation Fee program would determine how many peak hour trips could be mitigated by the strategy of completing the city’s bicycle and pedestrian network, employing a citywide transportation demand management program and implementing other automobile trip reduction measures. Nevertheless, even with General Plan Update policies and implementing actions, impacts at the above stated intersections would be significant.

(iii) Rationale and Conclusion: The EIR includes the following Mitigation Measures to alleviate the significant impacts noted above:

- **TR-1:** Main Street/Pratt Avenue: Install a traffic signal at the intersection.
- **TR-2:** Main Street/Elmhurst Avenue: Restripe the intersection to include the following:
  - Northbound approach: 1 left turn lane, 1 through lane
  - Southbound approach: 1 two-way left turn lane, 1 through-right turn shared lane
  - Eastbound approach: 1 left turn lane, 1 right turn lane
- **TR-3:** Main Street/Pope Street-Mitchell Drive: Construct one or more of the planned roadway extensions noted in General Plan Figure 5.2. Note that, per the General Plan, additional study of the connection(s) would be required, and the City Council would need to approve the connection at that time. Candidate extensions that may directly reduce the impacts at Main Street/Pope Street-Mitchell Drive include:
  - Connection 2A: College Avenue extension to Mills Lane (may require realignment of Mills Lane to meet Main Street/Grayson Avenue intersection)
  - Connection 3: Oak Avenue extension from Mitchell Drive to Grayson Avenue
  - Connection 2B, Connection 2C, Connection 5B, or a combination of Connections 1, 4 and 5A may provide congestion relief to Main Street/Pope Street-Mitchell Drive, but these improvements have additional considerations related to neighborhood traffic volumes and costs related to crossings of the Napa River.
- **TR-4:** Main Street/Sulphur Springs Avenue: Install a traffic signal at the intersection.
- **TR-5:** Silverado Trail/Pope Street: Install a traffic signal at the intersection. The nearby intersection of Silverado Trail/Howell Mountain Road may require signalization as well because the two intersections are closely spaced.
- **TR-6:** Main Street/Grayson Avenue and Main Street/Mills Lane: Realign Mills Lane to form a four approach to the existing Main Street/Grayson Avenue intersection.
With the exception of the Silverado Trail/Pope Street intersection, these mitigation measures would require approval by Caltrans and/or further action by the City Council prior to implementation of the mitigation measure. As Main Street is a State highway (SR-29), mitigation measures along Main Street are subject to Caltrans approval, and thus the construction of the mitigation measures cannot be guaranteed by the City alone. Additionally, the mitigation measures along Main Street and Silverado Trail may be considered infeasible due to lack of funds to design and construct adequate improvements to accommodate future traffic volumes or due to lack of sufficient right-of-way to construct needed improvements. The impact is found to be significant and unavoidable under 14 CCR sections 15091(a)(2) and 15091(a)(3). This potential unavoidable significant impact is acceptable and overridden as set forth below in the Statement of Overriding Considerations.

IX. FINDINGS REGARDING PLAN ALTERNATIVES

30. The City adopts the EIR’s analysis and conclusions with respect to all of the alternatives discussed as supplemented by the findings below.

31. The two alternatives analyzed in the EIR, represent a reasonable range of potentially feasible alternatives that reduce one or more significant impacts of the Plan. These alternatives include the (1) No Project Alternative; (2) the Transportation Network Enhancement Alternative. The Transportation Network Enhancement Alternative was identified as the Environmentally Superior Alternative.

32. The City certifies that it has independently reviewed and considered the information on alternatives provided in the EIR and in the record. The EIR reflects the City’s independent judgment as to the Plan alternatives. The City finds that the Transportation Network Enhancement Alternative would feasibly achieve the Project objectives articulated in the EIR and would reduce or avoid several significant and unavoidable impacts of the Proposed Plan, as described below. The No Project Alternative described and evaluated in the EIR is rejected as infeasible and for the reasons stated in the EIR and described below. Each individual reason presented below constitutes a separate and independent basis for rejection on the basis of infeasibility, and, when the reasons are viewed collectively, provide an overall basis for rejection.

33. No Project Alternative: Under this alternative, the proposed St. Helena General Plan Update would not be adopted and the existing (1993) General Plan would remain in effect. This would include General Plan amendments and amendments to the Zoning Ordinance that have been approved by the City of St. Helena since adoption of the 1993 General Plan. Under the No Project Alternative, the city would operate under the existing General Plan, using it to guide the city’s future development. Under this alternative, the proposed changes to the existing General Plan would not occur. The existing land use classifications would remain in effect.

- Growth under the No Project Alternative is projected to result in approximately 360 new residents, 200 new housing units, and 780 new jobs in the City of St. Helena by 2040, which represents a 6 percent increase in population and 14 percent increase in employment over 2018 conditions.
Anticipated growth under the No Project Alternative is consistent with ABAG growth projections for St. Helena in 2040.

- The No Project Alternative would have similar significant impacts to the Proposed Plan in the area of agricultural resources. The Proposed Plan would result in a significant and unavoidable impact related to the potential conversion of approximately 118.5 acres of Farmland land within the City limit and SOI to urban uses. As with the Proposed Plan, the No Project Alternative also includes urban land use designations in areas of Important Farmland, which would allow for new development that would result in farmland conversion. While the No Project Alternative would introduce Agricultural Resource and Agricultural, Watershed, and Open Space land use designations in north and southeast portions of the Planning Area, it would also result in the possible conversion of Farmland to urban uses within the Urban Limit Line. Similar to the Proposed Plan, the No Project Alternative would result in a significant impact, given that agricultural land is a finite and irreplaceable resource that is not directly mitigable, aside from preventing development altogether. However, as the No Project Alternative would not involve the same minor adjustments to the ULL as the Proposed Plan, this alternative would result in the conversion of less Farmland within the City limit and SOI to urban uses than under the Proposed Plan.

- The No Project Alternative is expected to have fewer significant impacts than the Proposed Plan in the area of air quality but could expose sensitive receptors to substantial pollutant concentrations. Implementation of Mitigation Measure AQ-1 in the Proposed Plan would be required to reduce the impact of the No Project Alternative to a less than significant level, as development on commercial and industrial facilities could expose nearby receptors to substantial air pollutant concentrations.

- The No Project Alternative includes some policies to protect biological resources, but not the full range included in the Proposed Plan. In particular, it would not include the proposed Policy OS1.3, which protects contiguous corridors of riparian vegetation along the Napa River and its tributaries to ensure that sensitive species and habitats, and wildlife corridors are not impacted by future development, or policy OS4.1 addressing the protections of tree resources in both developed and undeveloped areas. The No Project Alternative also would not include all of the Proposed Plan’s implementation actions, which would require new development to minimize impact to biological resources through actions including but not limited to work plans for restoring sensitive habitat degraded by agriculture, biological assessments at special-status species habitat, management plans to restore sensitive habitat, and avoiding construction during nesting season through scheduling or a pre-construction survey to achieve policy goals. The No Project Alternative would not include policies designed to protect wetlands, thus could result in a significant and unavoidable impact. The No Project Alternative would include policies from the 1993 General Plan related to maintaining and enhancing biodiversity, protecting special-status species and their habitats, conserving habitats for native species, and protecting connectivity for wildlife movement.
Therefore, the No Project Alternative would include policies protecting biological resources but would not be as comprehensive and protective as the Proposed Plan and could result in significant impacts to special-status species, riparian habitat, and wetlands.

- The No Project Alternative includes policies to preserve historic sites and cultural resources, but it does not include policies pertaining to paleontological resources, nor does the No Project Alternative include a goal or policies specifically protecting Native American heritage or tribal cultural resources. Further, the No Project Alternative would not promote a compact, urban development pattern to the same extent as the Proposed Plan or the Transportation Network Enhancement Alternative. Therefore, while the No Project Alternative’s impacts on historical and cultural resources would be less than significant, it could not guarantee that impacts on paleontological and tribal cultural resources could be reduced below a level of significance. Therefore, the No Project Alternative would be considered to have potentially significant impacts on paleontological and tribal cultural resources.

- The No Project Alternative would not include policies aimed at reducing GHG emissions and promoting sustainability and multi-modal transportation. While the increase in VMT under the No Project Alternative would be lower than the Proposed Plan (5 percent and 25 percent, respectively), the No Project Alternative would not propose the adoption and implementation of a Climate Action Plan with specific and quantifiable goals to reduce emissions as is the case with implementation of the Proposed Plan. Thus, impacts related to GHG emissions and subsequent impacts on the environment for the No Project Alternative are considered even more significant than the Proposed Plan. The No Project Alternative would conflict with goals to reduce GHG emissions established in CARB’s 2017 Scoping Plan, AB 32, EO S-03-05, or BAAQMD’s CEQA Guidelines and therefore would result in a further significant impact.

- Under the No Project Alternative, VMT would increase by 5 percent over existing conditions and could have a significant impact on traffic-related vibration in the City of St. Helena, though less than impacts associated with the Proposed Plan. The implementation of Mitigation Measure NOI-1 would be required to assess the potential vibration impact in order to reduce this impact to a level that is less than significant.

- The No Project Alternative is expected reduce level of service impacts associated with the Proposed Plan, as it is expected to have the least amount of daily VMT, but it would still contribute to the need for transportation improvements. The No Project Alternative would not include the wide range of multi-modal and Complete Streets policies and actions found in the Proposed Plan. Existing LOS impacts would worsen under the No Project Alternative with no policies or mitigation measures in place and would lead to a significant and unavoidable impact regarding level of service.

**Findings and Supporting Facts:** Adoption of the No Project Alternative is infeasible; it would not allow the community to achieve the objective of updating the St. Helena General Plan to reflect current conditions and
community priorities, or to achieve the community’s vision for the future. The No Project Alternative is further infeasible and rejected as an alternative because it would not include sufficient policies to promote the Guiding Principles that support the community vision. Specifically, it would not contain the same agricultural preservation policies, public health and police to address environmental justice, policies to address a diversity of needs for housing and services, policies to support the revitalization of Downtown, policies to strengthen job opportunities and training, or Complete Streets policies to create a balanced circulation network. Further, the No Project Alternative was found to have more potentially significant and unavoidable impacts than either the Transportation Network Enhancement Alternative or the Proposed Plan, as the policies included in the No Project Alternative in many cases do not address the broad range of environmental topics covered by the Proposed Project and are not up to date with current laws and practices concerning environmental impacts. Notably, the No Project Alternative could impact important biological, cultural, and historic resources existing in the City of St. Helena due to the lack of protective policies, and would not substantially lessen impacts on agricultural resources or climate change.

34. Transportation Network Enhancement Alternative. This alternative differs from the Plan only in its proposal to extend Oak Street south from its current terminus at Mitchell Lane to Grayson Avenue. The new roadway would be constructed as a two-lane Downtown/Mixed Use Street with bicycle lanes and sidewalks, consistent with the City’s Engineering Standards, and a bridge would be constructed over Sulphur Creek. This roadway extension could also provide access to the Vine Trail. The Transportation Network Enhancement Alternative would retain the land use designations, citywide capital improvements, policy framework, and recommended mitigation measures of the Proposed Plan.

- As with the Plan, implementation of the Transportation Network Enhancement Alternative is projected to result in 700 new residents, 400 new housing units, and 1,000 new jobs in the City of St. Helena by 2040, which represents a 12 percent increase in population and 19 percent increase in employment over 2018 conditions. This level of growth is generally consistent with ABAG projections, and both the Plan and the Transportation Network Enhancement Alternative include policies which encourage infill development.

- The Transportation Network Enhancement Alternative would have similar significant impacts to the Plan in the area of agricultural resources. The Plan would result in the potential conversion of approximately 118.5 acres of Farmland within the city limit and SOI to urban uses. The Transportation Network Enhancement Alternative includes the same policy framework and urban land use designations in areas of Important Farmland as under the Plan, which would allow for new development that would result in farmland conversion. The Transportation Network Enhancement Alternative would also involve extending Oak Avenue south through additional parcels of Prime Farmland and Farmland of Statewide Importance, and would thus result in
greater impacts related to the conversion of Farmland to urban uses than the Plan.

- Impacts under the Transportation Network Enhancement Alternative are expected to be similar to those under the Plan as the two share policies that would protect or improve air quality. The Transportation Network Enhancement Alternative would have similar significant and unavoidable impacts related to the violation of air quality standards and the cumulatively considerable increase of criteria pollutants. Although future development under the Transportation Network Enhancement Alternative would be required to comply with applicable air quality plans, as with the Proposed Plan, there is no guarantee emissions would be mitigated below BAAQMD thresholds. As with the Plan, the Transportation Network Enhancement Alternative would result in a cumulatively considerable net increase of criteria pollutants and therefore impact attainment status for ROG, ozone, PM_{2.5} (as ROG is a precursor of ozone and PM_{2.5}) and PM_{10} emissions. Under the Transportation Network Enhancement Alternative, as with the Plan, a quantitative evaluation of potential health risk impacts from construction-related pollution is not possible without specific details on the locations of building footprints or their construction schedules. Therefore, mitigation measures that would mitigate air quality impacts from construction as they affect the community are needed in order to reduce impacts on sensitive receptors to less than significant levels.

- The Transportation Network Enhancement Alternative would have similar significant impacts to the Plan in the area of greenhouse gases and climate change. The Transportation Network Enhancement Alternative includes the same land use development pattern and buildout projections as the Plan with the exception of one road extension within the city's ULL. Implementation of the Plan, and therefore the Transportation Network Enhancement Alternative, would increase VMT by 25 percent over existing conditions and would generate GHG emissions in excess of the BAAQMD emissions target of 2.3 MTCO2e per service population by 2040. Cumulative GHG emissions under the Transportation Network Enhancement Alternative, as with the Plan, would contribute to climate change and significant impacts on the environment. Even accounting for State and federal standards, policies aimed at the reduction of VMT, and the implementation of Mitigation Measure GHG-1, the potential exists for the Plan, and therefore the Transportation Network Enhancement Alternative, to conflict with applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of GHGs.

- The Transportation Network Enhancement Alternative has the same land use development pattern and projected buildout as the Plan with the exception of the extension of Oak Avenue within the city's ULL. Therefore, differences in impacts on hydrology would result from construction and operation of the extension. Development within the floodway under both the Plan and Transportation Network Enhancement Alternative, including construction of housing, would constitute a significant impact, as FEMA designates these as channels which should flood regularly and provide unimpeded conveyance for
floodwaters during a typical large storm event. Mitigation Measure HYDRO-1 would result in the modification of floodway boundaries such that the proposed development would no longer be within the floodway pursuant to FEMA regulations. However, the extension of Oak Avenue would be within the floodway and could constitute a significant and unavoidable risk. Design of the extension and the bridge crossing Sulphur Creek that would reduce the impact of flooding on the Oak Avenue extension and nearby development would be required to reduce this impact to a level that is less than significant. However, impacts of the Transportation Network Enhancement Alternative on hydrology would be greater than those under the Proposed Plan.

- The Transportation Network Enhancement Alternative has the potential to result in a similar level of traffic-related noise as the Plan. Adherence to policies regarding noise levels and VMT reduction and the existing Napa County General Plan would reduce the potential traffic-related noise level impacts. However, the Transportation Network Enhancement Alternative would introduce an extension of Oak Avenue into area currently designated as Agricultural, resulting in a significant and permanent increase in ambient noise from traffic in the Planning Area. While implementation of the Transportation Network Enhancement Alternative would include policies aimed at reducing VMT and result in the paving of the Oak Avenue extension, this alternative could introduce a significant impact regarding traffic-related vibration in an area that is currently designated as Agricultural and contains the Sulphur Creek. Mitigation Measure NOI-1 would be required to assess the potential vibration impact of construction of this extension and the extension itself in order to reduce this impact to a level that is less than significant.

- **Findings and Supporting Facts:** The City finds that the Transportation Network Enhancement Alternative would be feasible and would allow the community to achieve the Plan objectives. Additionally, while the Transportation Network Enhancement Alternative could introduce potentially significant impacts related to agricultural resources, noise, and hydrology associated with the extension of Oak Street that would not occur under the Proposed Plan and is therefore not considered the environmentally superior alternative, the City nevertheless finds that the Transportation Network Enhancement Alternative would avoid or significantly reduce several of the impacts of the Proposed Plan. Specifically, the Transportation Network Enhancement Alternative would avoid significant and unavoidable traffic impacts that would result from the Proposed Plan at the following four intersections in 2040: Main Street/Pope Street-Mitchell Drive, Main Street/Grayson Avenue, Main Street/Sulphur Springs Avenue, and Main Street/Mills Lane. Under the Transportation Network Enhancement Alternative, it is projected that peak hour queuing conditions along Main Street south of the Downtown area would be equivalent to existing conditions, and thus impacts to upstream intersections related to queue spillback from the Downtown area would also be less than significant – an improvement over the Proposed Plan. Under the Transportation Network Enhancement Alternative, a total of three intersections (Main Street/Pratt Avenue, Main Street/Elmhurst
Avenue, and Silverado Trail/Pope Street) would operate at unacceptable LOS in 2040, four fewer than the Proposed Plan. Mitigation is available that would reduce impacts at these three intersections to a less than significant level; however, as Main Street is a State highway (SR-29), mitigation measures along Main Street are subject to Caltrans approval, and since there is currently no approved plan or funding to implement the mitigation measures, implementation cannot be guaranteed and impacts at these three intersections would remain significant and unavoidable. Additionally, the Transportation Network Enhancement Alternative would result in less VMT than the Proposed Plan and would therefore result in a slight reduction of GHG-related impacts than under the Proposed Plan, although GHG-related impacts would remain significant and unavoidable under the Transportation Network Enhancement Alternative as with the Proposed Plan.

XI. STATEMENT OF OVERRIDING CONSIDERATIONS

35. The City of St. Helena has: (1) independently reviewed the information in the EIR and the record of proceedings; (2) made a reasonable and good faith effort to eliminate or substantially lessen the impacts resulting from the Transportation Network Enhancement Alternative to the extent feasible by including in it policies and actions that effectively mitigate potential environmental impacts to the greatest extent feasible; and (3) balanced the Transportation Network Enhancement Alternative’s benefits against its significant unavoidable impacts.

36. The City also finds that the No Project Alternative discussed in the EIR should not be adopted because it is infeasible given it does not succeed in reducing environmental impacts while adequately meeting the Plan objectives. The City finds that the Transportation Network Enhancement Alternative most fully implements the Plan objective of reflecting current conditions and community priorities, and achieving the community’s vision for the future.

37. The City Council declares that it has adopted mitigation measures to reduce the Transportation Network Enhancement Alternative’s environmental impacts to the extent feasible; considered the entire administrative record, including the Final EIR; and weighed the Transportation Network Enhancement Alternative’s benefits against its environmental impacts. After doing so, the City Council has determined that the Transportation Network Enhancement Alternative’s benefits outweigh its environmental impacts and deem them acceptable.

38. The City Council identified the following public benefits in making this determination. Each of these public benefits serves as an independent basis for overriding all unavoidable adverse environmental impacts identified in these Findings and the EIR. The City Council considers these impacts to be acceptable, consistent with 14 CCR Section 15093.

- **Regional Agricultural Preservation.** Agriculture is a valued resource in the State of California, and particularly in Napa County and the surrounding region. As established in the vision for the Transportation Network Enhancement Alternative, St. Helena closely identifies with its agricultural heritage and owes much of its economy and character to past and present agricultural uses in and around the city. While the Transportation Network Enhancement Alternative
would result in the conversion of Prime Farmland, Farmland of Statewide Importance, and Unique Farmland to non-agricultural use, it does so in support of a long-term vision of preserving agricultural resources in the region. As a general plan, the Transportation Network Enhancement Alternative is charged with accommodating expected growth in St. Helena over the long term. As a developed community in a rural area, the city is a locus for future growth in a paradigm that emphasizes infill development around downtown St. Helena in order to discourage sprawl and reduce development pressures on agricultural uses outside of the city’s developed urban core. Although this strategy would require making more land in the city’s core available for development in the future, in combination with the Transportation Network Enhancement Alternative’s policies to encourage the continuation of agricultural uses in the city’s periphery and to ensure agricultural conservation statewide through 1:1 farmland mitigation, it would direct future housing and jobs development and densification to occur in portions of the city that have already largely been developed, in order to protect the viability of agricultural activities elsewhere.

- **Balanced Mix of Land Uses and Sustainable Land Use Pattern.** The community vision, stated as part of the planning process for the Transportation Network Enhancement Alternative, rests on the three objectives of a sustainable community, a stable economy, and environmental stewardship. The Transportation Network Enhancement Alternative is intended to achieve these objectives by guiding thoughtful land use decisions. Land uses and policies in the Transportation Network Enhancement Alternative were designed to balance the needs for housing, economic development, and environmental resource conservation over the long term. Land use designation changes in the community’s core area would provide housing opportunities at a greater range of affordability levels while also allowing for non-residential land uses that can meet local needs for goods and services while generating additional revenue from sales and transient occupancy taxes to support the provision of high-quality public services. Together, a balance of housing and economic development can provide an environment where community members can live and work in the city while reducing the need for local employees to commute by car along SR-29, thus also reducing the city’s contribution to air pollution and greenhouse gas emissions. Furthermore, by planning ahead for housing development, the Transportation Network Enhancement Alternative also increases the likelihood that the city will continue to meet its Regional Housing Needs Allocation (RHNA) and provide its fair share of regional housing opportunities.

Additionally, the Transportation Network Enhancement Alternative makes the policy choice to allow higher densities and intensities in the center of the city to allow for the designation of areas along the periphery for open space preservation. As the Transportation Network Enhancement Alternative makes clear, open spaces are key to preserving biological diversity, water quality, air quality, and safety. The Transportation Network Enhancement Alternative represents a choice to proactively direct projected demand for housing into infill locations at higher densities in order to prevent both sprawl that can threaten the city’s open spaces and a decline of housing affordability, while also reducing car dependency.
• **Construction Jobs.** In addition to economic development for local-serving and tourism businesses, growth envisioned in the Transportation Network Enhancement Alternative will provide development-related jobs for the construction industry as well as for architects, engineers, and other related professionals.

• **Managing the Effects of Regional Traffic.** Analysis in the EIR for the Transportation Network Enhancement Alternative found significant impacts related to conflicts with LOS standards established for monitoring the performance of the local circulation system at the following intersections with buildout of the Transportation Network Enhancement Alternative in 2040: Main Street/Pratt Avenue, Main Street/Elmhurst Avenue, and Silverado Trail/Pope Street. Some increase in traffic will be expected due to growth from the Transportation Network Enhancement Alternative; however, as stated previously, the growth envisioned in the Transportation Network Enhancement Alternative is desirable to the community for various reasons related to housing provision and affordability; economic stability; alleviation of projected increases in traffic congestion and vehicle queuing on SR-29 in 2040; and compact, balanced growth in the context of regional agricultural and open space conservation. Ultimately, mitigation of traffic impacts to SR-29 is outside of the City’s control. SR-29 is a State highway and the main route between the Bay Area and the cities of Napa County. As such, any alterations to the roadway are under Caltrans jurisdiction rather than the City’s. Furthermore, a substantial amount of traffic along SR-29 is regional in nature and is attributed to regional through traffic rather than trips originating or ending within St. Helena. Therefore, increases in traffic along SR-29 over the planning horizon will also be driven by growth in other communities and county/region-wide transportation patterns. While the City may not be able to reduce impacts related to conflicts with LOS standards from the Transportation Network Enhancement Alternative on regional roadways in St. Helena and the surrounding area below a level of significance, policies in the Transportation Network Enhancement Alternative that seek that promote compact development, balance jobs and housing to reduce commute trip length, improve multi-modal connectivity within the city, and manage transportation demand would reduce some of the effects of congestion on SR-29 and Silverado Trail as experienced by community members.

• **Shift to Multi-modal Circulation System.** Based on its compact land use pattern, circulation network, and circulation policies, the Transportation Network Enhancement Alternative would promote a shift to a multi-modal circulation system. Improvements to bicycle and pedestrian infrastructure would improve convenience and safety for residents, students, employees, and visitors seeking to make local trips without a car or using SR-29. In light of regional traffic along SR-29, expanding opportunities for multi-modal travel is one way that the City can improve quality of life for the community and over time help reduce locally-generated vehicle miles traveled and associated greenhouse gas emissions and air quality impacts.

• **Community Vision.** More generally, the Transportation Network Enhancement Alternative would allow for the achievement of the community’s vision to be “a
well-integrated place linked by effective community institutions, safe neighborhoods and streets, and superior schools, parks, and public facilities. In addition, planning for thoughtful, well-managed development while maintaining its small-town, rural character…” The City finds that each of the specific economic, legal, social, technological, environmental, and other considerations described below and the benefits of the Transportation Network Enhancement Alternative summarized below independently outweigh its remaining significant adverse impacts and is an overriding consideration independently warranting approval. The remaining significant adverse impacts are acceptable in light of each of these overriding considerations.

XII. CONCLUSION

39. In summary, after balancing the specific economic, legal, social, technological, and other benefits of the Transportation Network Enhancement Alternative, the City of St. Helena finds that the unavoidable adverse environmental impacts identified may be considered “acceptable” due to the specific considerations listed above, which outweigh the unavoidable, adverse environmental impacts of the Transportation Network Enhancement Alternative.

40. The City of St. Helena has considered information contained in the EIR prepared for the Plan as well as the public testimony and record of proceedings in which the Plan was considered. Recognizing that significant unavoidable impacts related to agricultural resources; air quality; energy, greenhouse gases, and climate change; and transportation may result from implementation of the Transportation Network Enhancement Alternative, the City finds that the benefits of the Transportation Network Enhancement Alternative and overriding considerations outweigh the potential adverse effects. Having included all feasible mitigation measures in the EIR or as policies and actions in the Transportation Network Enhancement Alternative, and recognized all unavoidable significant impacts, the City of St. Helena hereby finds that each of the separate benefits of the Transportation Network Enhancement Alternative, as stated herein, is determined to be unto itself an overriding consideration, independent of other benefits, that warrants adoption of the Transportation Network Enhancement Alternative and outweighs and overrides its unavoidable significant effects, and thereby justifies the adoption of the Transportation Network Enhancement Alternative.

41. In reaching this conclusion and approving the Transportation Network Enhancement Alternative:

- The City has considered the information contained in the Final EIR and fully reviewed and considered all of the public testimony, documentation, exhibits, reports, and presentations included in the record of these proceedings. The City Council specifically finds and determines that this Statement of Overriding Considerations is based upon and supported by substantial evidence in the record.
- The City has carefully weighed the benefits of the Transportation Network Enhancement Alternative against any adverse impacts identified in the Final EIR that could not be feasibly mitigated to a level of insignificance. While the City has required all feasible mitigation measures, some impacts remain potentially significant.
This Statement of Overriding Considerations applies specifically to those impacts found to be potentially significant and unavoidable as set forth in the Final EIR and the record of these proceedings.