



# Napa County Regional Climate Action and Adaptation Plan

Climate Action Committee Meeting  
February 28, 2025



# **RCAAP CEQA Approach**

# Overview



Requirements for environmental review



GHG emissions evaluations for future projects



Overview of options for environmental review approach



Additional considerations, take aways, and next steps



## **Why does the RCAAP Require Environmental Review?**



# The RCAAP is a “Project” as defined by CEQA

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- Adoption of the RCAAP by local jurisdictions in the JPA would be a discretionary action by public agencies that could cause a direct, or reasonably foreseeable indirect, physical change in the environment

## **Project:** “whole of the action”

- RCAAP will be a comprehensive program of complementary actions
- 46 GHG reduction measures and 40 adaptation measures
- Assumes all jurisdictions implement the measures and actions so that the GHG emissions reductions and climate adaptation outcomes are achieved.

2025 CEQA

*California Environmental Quality Act*

*Statute & Guidelines*

*Association of Environmental Professionals*



# Informed Decision Making

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- **CEQA document evaluates/discloses the impacts of implementing RCAAP measures:**
  - landfill modification
  - energy retrofits to historic structures
  - construction of detention basins, fire breaks, resilience hubs
  - upgrade or relocation of infrastructure subject to flooding
  - installation of erosion control measures
  - construction of floodgates and barriers
- **Identifies potentially significant impacts of implementing the RCAAP and appropriate mitigation**



# Evaluation of the RCAAP Program

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- Member agencies implementing programs and specific projects detailed in the measures and actions of the RCAAP would be able to rely on the programmatic assessment of the impacts of those measures
- Where measures and actions would require future discretionary action at the local level, environmental analysis could tier from the document for the program
  - Demonstrate within the scope: no further review required
  - Focus future environmental review where required



# **GHG Streamlining Benefits**



# Tiering and Streamlining the Analysis of GHG Emissions

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- **Section 15183.5 of the CEQA Guidelines**
- **CEQA Qualified GHG reduction plans must meet certain criteria**
  - Technical requirements related to inventory, forecasts, and achieving reductions that align with targets
  - Also includes a requirement that the plan is “adopted in a public process following environmental review”

These plans are often referred to as “CEQA Qualified”



# How GHG Streamlining Works

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Because the RCAAP:

- Evaluates and mitigates the existing and forecasted GHG emissions of the six jurisdictions

And:

- The effects of implementing the measures and actions necessary to mitigate the GHG emissions will have been documented pursuant to CEQA

Projects consistent with the growth forecasts and all applicable GHG reduction measures **would not** have to conduct project-level GHG emissions analysis

- Future project-level analyses would still require proposed projects to demonstrate that they are consistent with RCAAP and incorporate applicable measures as mitigation.



# **CEQA Approach Options**



## No CEQA Review/Exemption

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- **Benefits**
  - Minimal time and cost investment
- **Challenges**
  - The RCAAP will not meet the minimum criteria specified in CEQA Guidelines Section 15183.5
  - No GHG analysis streamlining will be provided to future projects
  - There are no applicable Categorical Exemptions



# Initial Study/Mitigated Negative Declaration

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- **Benefits**

- Relatively quick; lower standards for review and public participation
- Relatively lower cost

- **Challenges**

- Legal defensibility (standard of review)
- Uncertainty (it may not be possible to mitigate all impacts)



# Initial Study/Programmatic EIR

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- **Benefits**

- Focuses PEIR preparation on areas with potential for significant impacts - in particular GHG/air quality, biological resources, and cultural resources.
- Highly defensible

- **Challenges**

- Two-step review process may take longer than PEIR preparation alone
- More costly and labor-intensive than an IS/MND



## Programmatic EIR

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- **Benefits**
  - Provides a complete and thorough analysis of potential impacts
  - Some topics can still be screened out for detailed analysis
  - Highly defensible
- **Challenges**
  - More costly and labor-intensive than an IS/MND



# Programmatic EIR + Jurisdiction-Specific Analysis

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- **Benefits**

- Most supportive of jurisdiction-specific implementation
- Highly defensible

- **Challenges**

- Most costly and labor-intensive
- Can result in long, duplicative documents



# Recommendation

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## Programmatic EIR

- Highly defensible
- Approx. 1 year timeline
- Covers all required resource areas in a single document
- Maximizes tiering potential
- Necessary for significant and unavoidable impacts
  - could result due to uncertainty

# Additional Considerations

## **Lead Agency**

- Napa County

## **Responsible Agencies**

- Other Jurisdictions in the JPA
- Actively engaged in the scoping, preparation, and review of the environmental document
- Conduct targeted outreach within their own jurisdictions

This organization will facilitate a more cohesive and streamlined process for preparation and certification of the environmental document.

# Take Aways

## Cooperation Remains Essential

- No jurisdiction's portion of the RCAAP would have full independent utility from the remainder of the RCAAP
- If any jurisdiction does not adopt and implement the RCAAP it could jeopardize the region-wide effort to achieve GHG targets.
- Every jurisdiction needs an evaluation of the whole "project" pursuant to CEQA to support RCAAP adoption
- Environmental review allows for the future development projects to streamline their GHG analyses



## Next Steps

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1. Review and discuss memo with agency leadership
2. Identify preferred approach
3. Further discussion and possible action at the March 28, 2025 CAC Meeting
4. Scoping and contracting for selected approach
5. Public Draft RCAAP in Spring or Early Summer 2025
6. Environmental document preparation in the Summer and Fall of 2025

**THANK YOU**

Golden Gate

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