Mills Lane Storm Drain Improvements Project

Mills Lane, St. Helena, CA

Initial Study/Mitigated Negative Declaration

CITY OF ST. HELENA

September 2021

Lead Agency:

City of St. Helena
Public Works Department
1572 Railroad Avenue
St. Helena, CA 94574

Contact:

Edrees Argand, EIT
Assistant Engineer

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INITIAL STUDY OF ENVIRONMENTAL SIGNIFICANCE

PROJECT NAME:	Mills Lane Storm Drain Improvements Project (Project)
SITE ADDRESS:	Mills Lane, St. Helena, California
APN:	The proposed Project involves storm drain improvements along the entirety of Mills Lane, as well as through portions of Assessor's Parcel Numbers [APNs] 009-070-029 and 009-120-060
GENERAL PLAN:	Industrial, Urban Reserve, Agriculture
ZONING:	Service Commercial (SC), Industrial (I), Agriculture (A-20), Winery (W)
APPLICANT:	City of St. Helena Public Works Department 1572 Railroad Avenue St. Helena, CA 94574
CONTACT:	Edrees Argand, Assistant Engineer 1572 Railroad Avenue St. Helena, CA 94574 eargand@cityofsthelena.org
PROJECT SUMMARY:	**Mills Lane Storm Drain Improvements Project:** The City of St. Helena (City) identified the need for a storm drainage system on Mills Lane from Highway 29 to the Napa River in the early 1970's, and completed a design in 1974. This storm drain was later considered in the City's 2000 Master Plan of Drainage, identified in the City's Storm Drain Impact Fees and the 2005 Highway 29 Specific Plan and its Environmental Impact Report (EIR) prepared in 2003 (SCH #2001082017). While the storm drain was considered in the above documents, the project was never implemented. The Mills Lane Storm Drain Improvements Project (proposed Project) entails construction of a new storm drain along Mills Lane, from the intersection of State Highway 29 east to the Napa River. The proposed storm drain system connects to an existing 30" storm drain pipe at a new drop inlet structure. The new storm drain will consist of 45 feet of 36" pipe, 894 feet of 48" pipe, and 3,867 feet of 60" pipe. All proposed storm drain pipe will either be reinforced concrete pipe (RCP) or High Density Polyethylene Pipe (HDPE.) Total length of the proposed storm drain is approximately 4,900 feet. The storm drain will convey City stormwater runoff and discharge to the west bank of the Napa River, approximately 600-feet east of the terminus of Mills Lane. The proposed storm drain system will reroute existing discharge from a roadside ditch, as well as pick up future discharge from the proposed Farmstead development. Some road repaving will be necessary; however, no above-ground structures are proposed.

INTRODUCTION

Purpose and Intent

This Initial Study/Mitigated Negative Declaration (IS/MND) for the proposed Mills Lane Storm Drain Improvements Project (hereinafter referred to as the "Project") has been prepared by the City of St. Helena as lead agency in full accordance with the procedural and substantive requirements of the California Environmental Quality Act (CEQA) and the CEQA Guidelines.

This IS/MND is intended to inform City decision-makers, responsible agencies, interested parties and the general public of the proposed Project and its potential environmental effects. This IS/MND is also intended to provide the CEQA-required environmental documents for all city, local and state approvals or permits that might be required to implement the proposed Project.

CEQA Guidelines Section 15063(c) lists the following purposes of an Initial Study:

- Provide the Lead Agency with information to use as the basis for deciding whether to prepare an Environmental Impact Report (EIR) or a Negative Declaration.
- Enable an Applicant or Lead Agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby possibly enabling the project to qualify for a Negative Declaration.
- Assist in the preparation of an EIR, if one is required.
- Facilitate environmental assessment early in the design of a project.
- Provide documentation of the factual basis for the finding in a Negative Declaration that a project will not have a significant effect on the environment.
- Eliminate unnecessary EIRs.
- Determine whether a previously prepared EIR could be used with the project.

The City of St. Helena, as the lead agency, has determined that a Mitigated Negative Declaration (MND) is the appropriate level of environmental review for the proposed Project.

Public Review

In accordance with CEQA and the state CEQA Guidelines, a 30-day public review period for the Project will begin on September 20, 2021 and end on October 19, 2021. This IS/MND has been distributed to interested or involved public agencies, organizations, and private individuals for review. In addition, the IS/MND has been made available for general public review at the following location:

City of St. Helena
Public Works Department 1572 Railroad Avenue
St. Helena, CA 94574

The IS/MND is also available online at: https://www.cityofsthelena.org/publicworks/project/r20-02-mills-lane-storm-drain-project

During the public review period, the public and relevant agencies will have an opportunity to provide written comments on the information contained within this IS/MND. The City will use the final IS/MND and all comments and correspondence received within the public comment period for all environmental decisions related to the proposed Projects.

In reviewing the IS/MND and as articulated in Section 15204(a) of the CEQA Guidelines, affected public agencies and interested members of the public should focus on the sufficiency of the document in identifying and analyzing potential impacts on the environment from the proposed Project, and ways in which the significant effects of the project are proposed to be avoided or mitigated.

Comments on the IS/MND should be submitted in writing and received by the City of St. Helena prior to the end of the 30-day public review period on October 19, 2021. Written comments should be submitted to:

Edrees Argand, EIT
Assistant Engineer
City of St. Helena
Public Works Department
1572 Railroad Avenue
St. Helena, CA 94574

Phone: (707) 968-2627
Email: eargand@cityofsthelena.org

SETTING

Project Location

The City of St. Helena is located in the northern end of the Napa Valley, approximately 18 miles northwest of the City of Napa and 65 miles north of San Francisco (see Figure 1). Napa Valley is a long narrow northwest trending alluvial plane flanked by the mountain ridges of the Mayacamas and Vaca Mountain range to the west and east, respectively. The Napa River extends along the eastern portion of St. Helena and is fed by several tributaries within St. Helena, including Sulphur Springs Creek and York Creek which serve as year-round tributaries to the river.

The City's incorporated boundaries comprise 3,285 acres or 5.1 square miles. The City of St. Helena is divided into two distinct areas: a developed "urban service area" and a more, rural, agricultural area located around the periphery such that the City exhibits a rather traditional landscape whereby commercial land uses are concentrated in the city center and along State Route 29 (SR 29), with residential development radiating outwards to the northeast and southwest. The outer edge of the urban service area is demarcated by the urban limit line (ULL) which is a parcel specific boundary that marks the limit of allowed urban development. The intent of the ULL is to discourage urban sprawl and promote sensitive development which preserves the rural and agricultural lands around the City.

Surrounding Land Uses and Setting

The proposed Project involves storm drain improvements along the entirety of Mills Lane, as well as through portions of Assessor's Parcel Numbers [APNs] 009-070-029 and 009-120-060. The majority of the Project is located along Mills Lane, which is public road right-of-way and does not have an APN. The Project site is located on the east side of Main Street (SR 29) in northern St. Helena (see Figure 2). The overall topography of the Project site is flat with a slight eastward slope towards the Napa River, ranging from approximately 190 to 240 feet above sea level. Regional access to the Project site is provided by State Route 29/State Route 128. Vehicular access to the Project site is provided via Mills Lane.

The Project site is predominantly located in Mills Lane, a paved road for the majority of its length except near the Napa River. At the eastern terminus of Mills Lane, the Project site follows an unpaved farm road to the Napa River corridor. The Project site is bounded on the northeast by the Napa River. The land surrounding the Project site is predominantly agricultural, with orchards and vineyards. There are four rural residences on the north side of Mills Lane spread along the length of the Project site. The land on both sides of Mills Lane in the western portion of the Project site consists of fallow fields that are not actively in agricultural production. The eastern end of the Project site terminates within the Napa River corridor. Vegetation in this reach of the river consists of riparian woodland with a dense understory (see Figures 3 through 8).

Regional land uses include rural residential, vineyards, and orchards. The edge of residential neighborhoods of St. Helena are approximately 800 feet northwest of the Project site. Historically, land uses in the region have primarily been agricultural, with little change apparent on historical aerial imagery since 1948.



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Sources: National Geographic, WRA | Prepared By: njander, 1/21/2021

Figure 1. Regional Location Map

Mills Lane Storm Drain
Improvements Project
St. Helena, California

0 0.5 1 Miles

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Sources: USDA NAIP Imagery 2018, WRA | Prepared By: njander, 1/21/2021

Figure 2. Project Site Aerial Map

Mills Lane Storm Drain
Improvements Project
St. Helena, California

0 500 1,000 Feet

N

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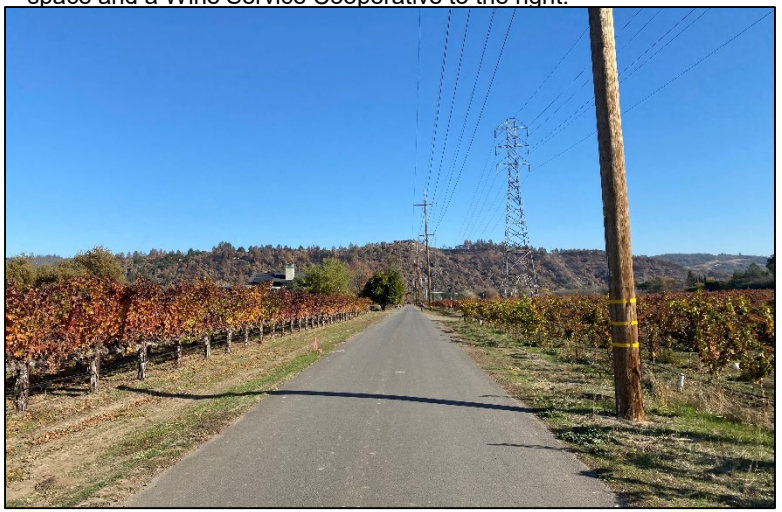
Southwest view of the Project site looking towards the railroad tracks and State Route 29 (St. Helena Highway).



Northwest view of the Project site looking down Mills Lane with hills in the distance, agricultural fields to the left of Mills Lane, and open space and a Wine Service Cooperative to the right.



Northwest view of the Project site, approximately 740 feet down Mills Lane, looking towards the Napa River with agricultural fields and residences to the left of Mills Lane, and an existing building and telephone lines to the right.



Northwest view of the Project site with vineyards and private residence to the left of Mills Lane, and vineyards and telephone lines to the right. The Napa River and surrounding Hills are shown down in the distance.

Figure 3. Views of the Project Site (1 of 3)



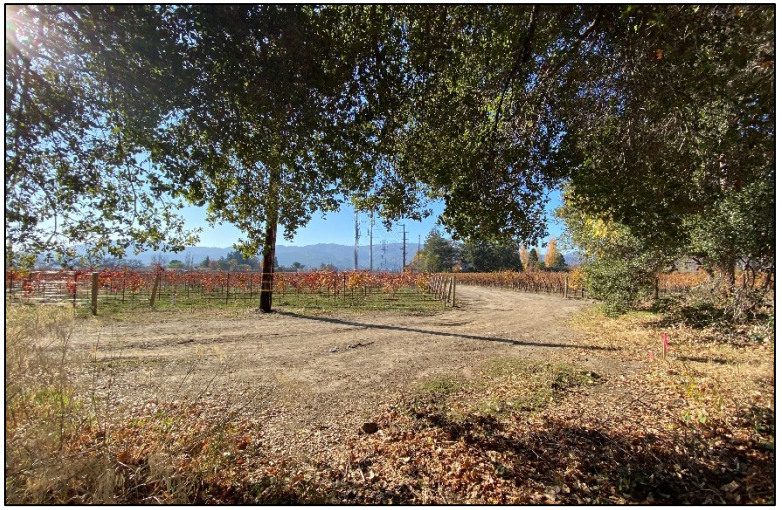
View of the Project site where the paved road becomes a dirt path, approximately 3,950 feet down Mills Lane. A private residence is located to the left of Mills Lane, and vineyards and telephone lines are to the right



Southwest view of the Project site where the paved road becomes a dirt path, approximately 3,950 feet down Mills Lane. Southwest view of the private residence and telephone lines is depicted here.



View of the Project site looking towards the northwest, depicting the surrounding vineyards, trees, telephone lines, with the Napa River at the base of the hills.



View of the Project site from the Napa River, looking towards the southwest, depicting the surrounding vineyards and trees.

Figure 4. Views of the Project Site (2 of 3)



View of the Project site depicting the dirt path reaching the Napa River, as well as the surrounding vineyards, telephone lines, and trees.



View of the proposed outfall location of the Project site at the Napa River.

Figure 5. Views of the Project Site (3 of 3)



Southeast view of the off-site Project area which supports a variety of commercial businesses, light industrial uses, and a school, separated by highway 128 and railroad tracks.



Northwest view of the off-site Project area which supports a variety of commercial businesses and light industrial uses, separated by highway 128 and railroad tracks.



View of an existing A&W restaurant located southwest of the Project area.



Northeast view of the surrounding Project area, looking down Mills Lane, with a the St. Helena Veterinary Hospital to the left and a wine service cooperative to the right.

Figure 6. Views of Surrounding Land Uses (1 of 3)



Off-site view looking towards the west-southwest of the Project site, consisting of open space and residential housing.



View of the surrounding Project area, looking down Mills Lane, with construction and telephone lines to the east.



View of the Project area looking towards the southwest, with vineyards and telephone lines to the left, a residential home to the right, and views of the hillside in the distance.



Approximately 1,370 feet down Mills Lane looking towards the southeast, views of a building, vineyards. telephone lines, trees and hills in the distance.

Figure 7. Views of Surrounding Land Uses (2 of 3)



View of the surrounding hillside, vineyards, and dirt path surrounding the Project area near the Napa River.



View of the Project area looking towards the northeast with views consisting of the hillside and the Napa River right below. The dirt path portion of the Project site is shown here with vineyards to the left, and vineyards and telephone lines to the right.



Northeast view towards the Napa River of the surrounding hills, with vineyards to the left and right of Mills Lane, and construction of a new structure to the left.



View of the dirt path adjacent to the Napa River.

Figure 8. Views of the Surrounding Land Uses (3 of 3)

General Plan and Zoning

The City of St. Helena General Plan Update 2040 provides the vision for the community's natural and built environment through a series of goals and policies. Mills Lane is seen passing through the following General Plan Land Use designations: Industrial, Urban Reserve, and Agriculture.

The City of St. Helena Zoning Ordinance implements the goals and policies of the General Plan. Several different districts are identified in the Zoning Ordinance that are intended to, among other things, provide for a wide range of uses and enhance the community's vision to preserve, protect and enhance its unique character and quality of life. Mills Lane is surrounded by a variety of zones: Service Commercial (SC), Industrial (I), Agriculture (A-20), Winery (W).

PROJECT BACKGROUND

The City of St. Helena identified the need for a storm drainage system on Mills Lane from Highway 29 to the Napa River in the early 1970's, and completed a design in 1974; however, the project was not constructed at that time. This storm drain was later considered in the City's 2000 Master Plan of Drainage, identified in the City's Storm Drain Impact Fees and the 2005 Highway 29 Specific Plan and its Environmental Impact Report (EIR) prepared in 2003 (SCH #2001082017). While the storm drain was considered in the above documents, the project was never implemented.

The proposed Project is a City priority both in response to the updated Integrated Master Utility Plan and current development proposals on Mills Lane. Farmstead Lodge is one such project located immediately east of Highway 29. Project completion is dependent on the installation of the Mills Lane Storm Drain Project. Stormwater from the west side of town is currently conveyed east under Highway 29 and discharges on the north side of Mills Lane.

PROJECT DESCRIPTION

As mentioned above, stormwater from the west side of town is currently conveyed east under Highway 29 and discharges on the north side of Mills Lane. The proposed Project consists of a new storm drain that will convey this runoff, as well as drainage from runoff east of Highway 29, and can service future development in the area, discharging to the Napa River. The proposed Project entails construction of a new storm drain within Mills Lane, which is a City street for most of its length, from its intersection with State Highway 29 east to the Napa River. The proposed storm drain system connects to an existing 30" storm drain pipe at a new drop inlet structure. The new storm drain will consist of 45 feet of 36" pipe, 894 feet of 48" pipe, and 3,867 feet of 60" pipe. All proposed storm drain pipe will either be RCP or HDPE. The total length of the proposed storm drain is approximately 4,900 feet. The storm drain will discharge to the west bank of the Napa river approximately 600 feet east of the terminus of Mills Lane. Some road repaving will be necessary; however, no above-ground structures are proposed. The proposed Project also includes a reclaimed water line in the same trench as the storm drain that will eventually be connected to the City's recycled water line system.

SITE PREPARATION AND CONSTRUCTION

Schedule

Construction work will be limited to the days and hours set by the City's Municipal Code Section 17.16.030. Project construction is anticipated to take approximately two months and is anticipated to start in Summer 2022 and end in Fall 2022.

Equipment and Staging

The following equipment is anticipated to be required for project construction: 1 excavator, 1 signal board, tractors/loaders/backhoes, pavers, and paving equipment. Construction staging would occur along the entirety of Mills Lane.

Cut and fill

The project involves approximately 14,000 cubic yards (CY) of cut, and approximately 2,000 CY of fill. Approximately 12,000 CY would be exported and transported to an appropriate off-site location. Project improvements will not increase the overall impervious area on site (figures 9 through 18).

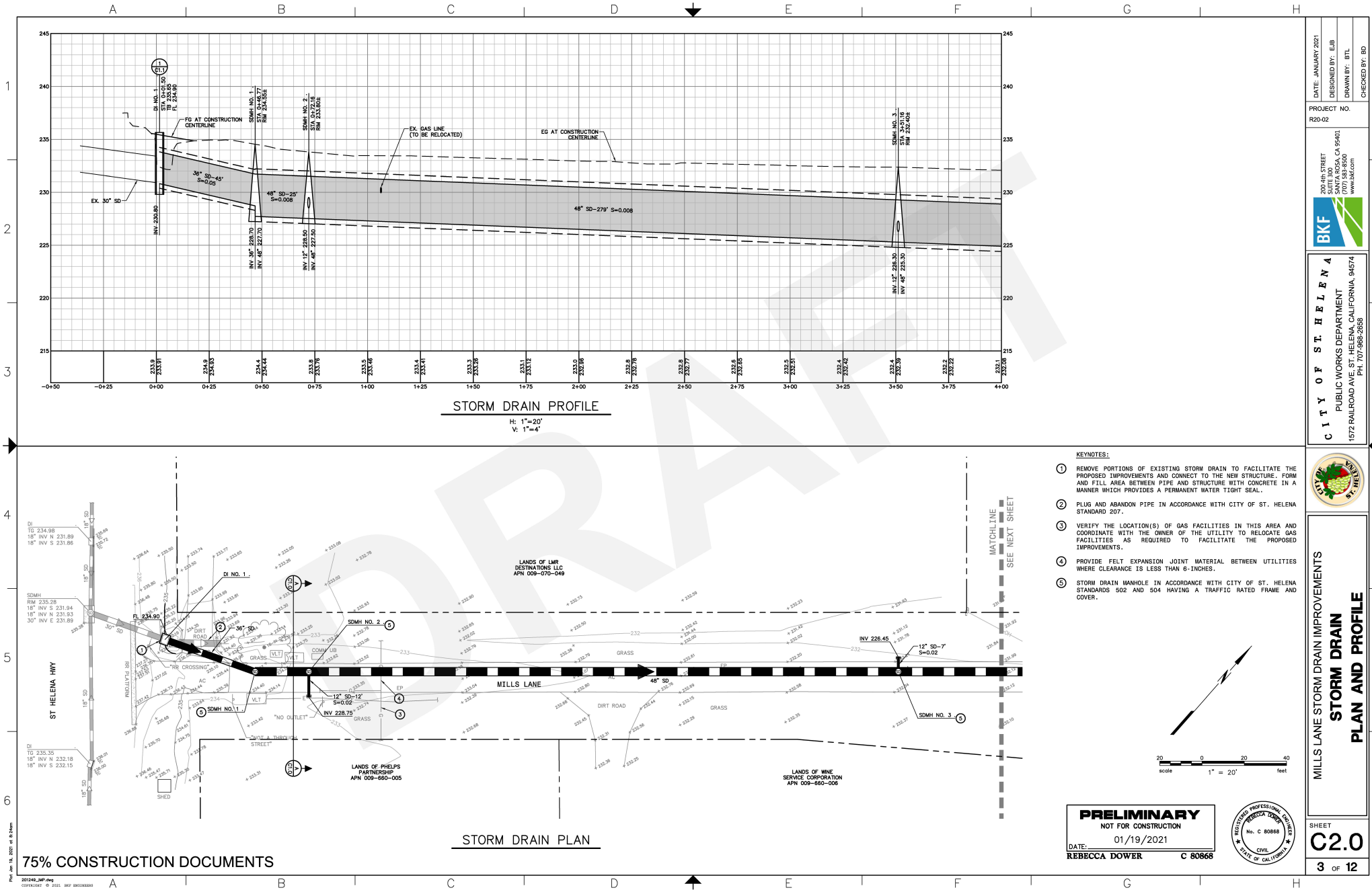


Figure 9. Storm Drain Plan and Profile (1 of 10)

Mills Lane Storm Drain Improvements Project
St. Helena, California

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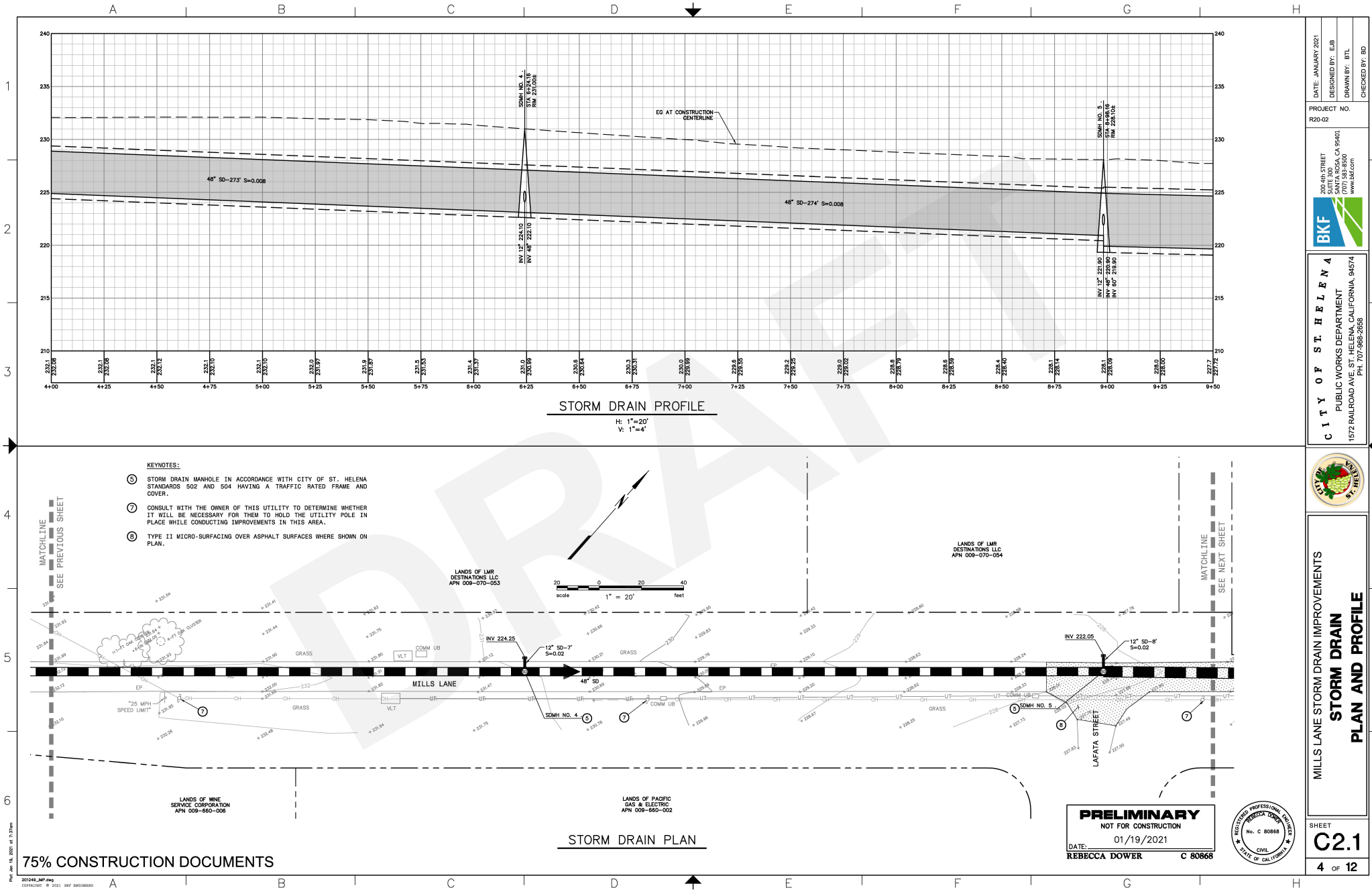


Figure 10. Storm Drain Plan and Profile (2 of 10)

Mills Lane Storm Drain Improvements Project
St. Helena, California

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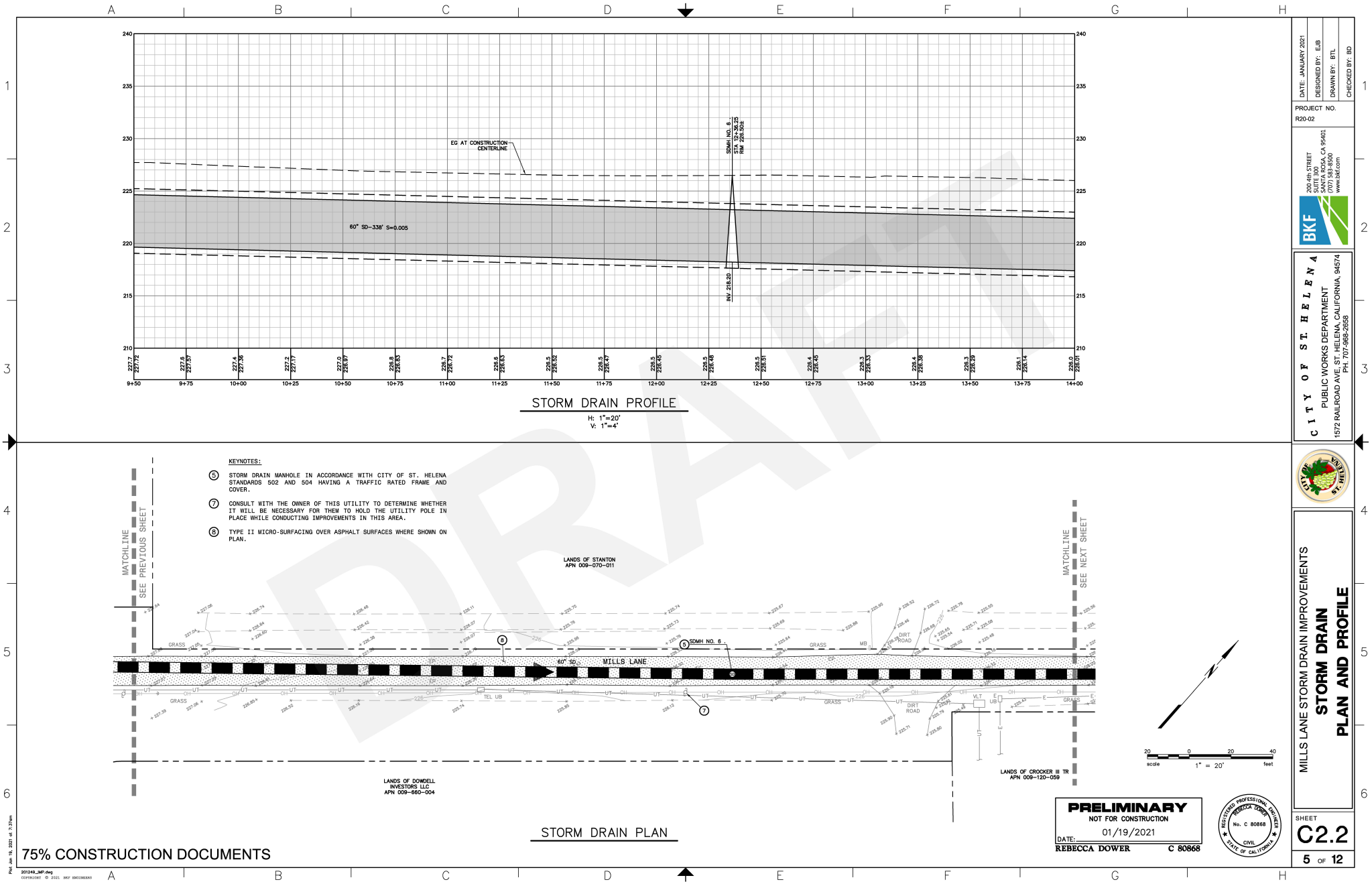


Figure 11. Storm Drain Plan and Profile (3 of 10)

Mills Lane Storm Drain Improvements Project
St. Helena, California

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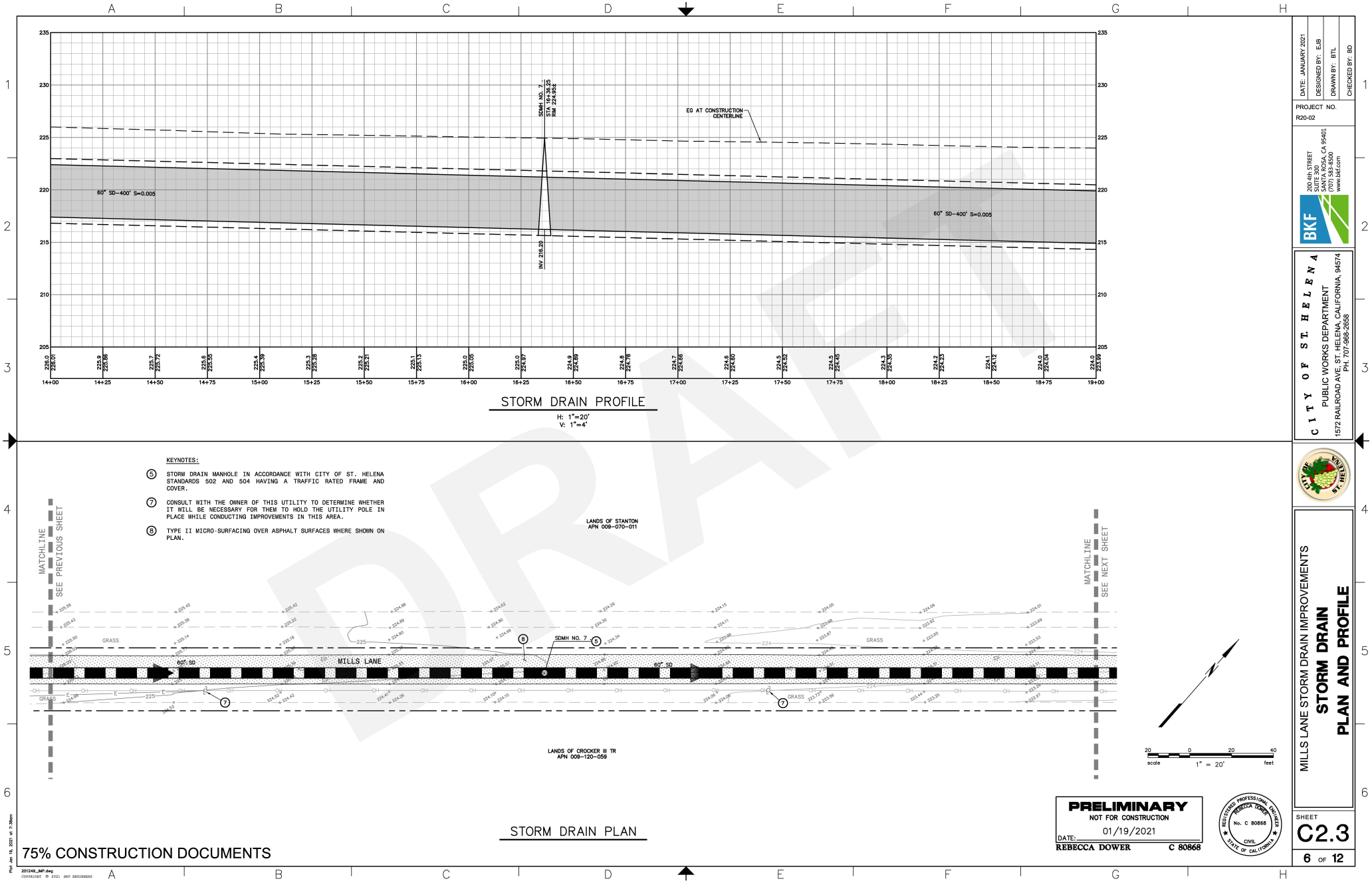
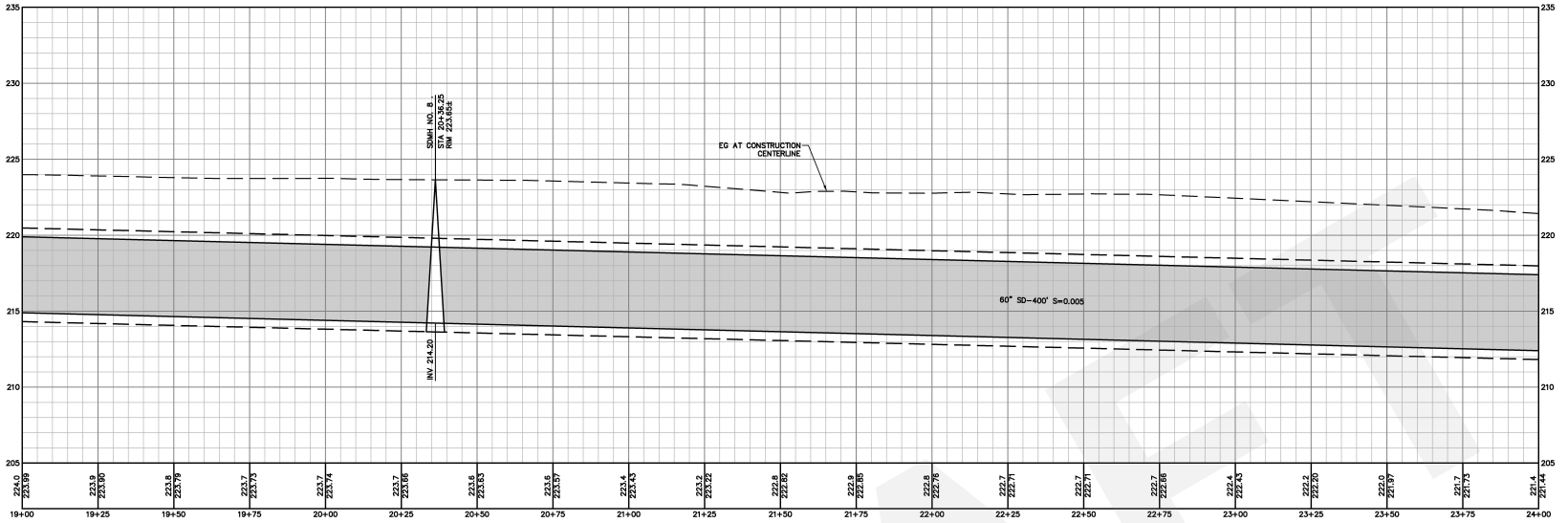


Figure 12. Storm Drain Plan and Profile (4 of 10)

Mills Lane Storm Drain Improvements Project
St. Helena, California

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STORM DRAIN PROFILE

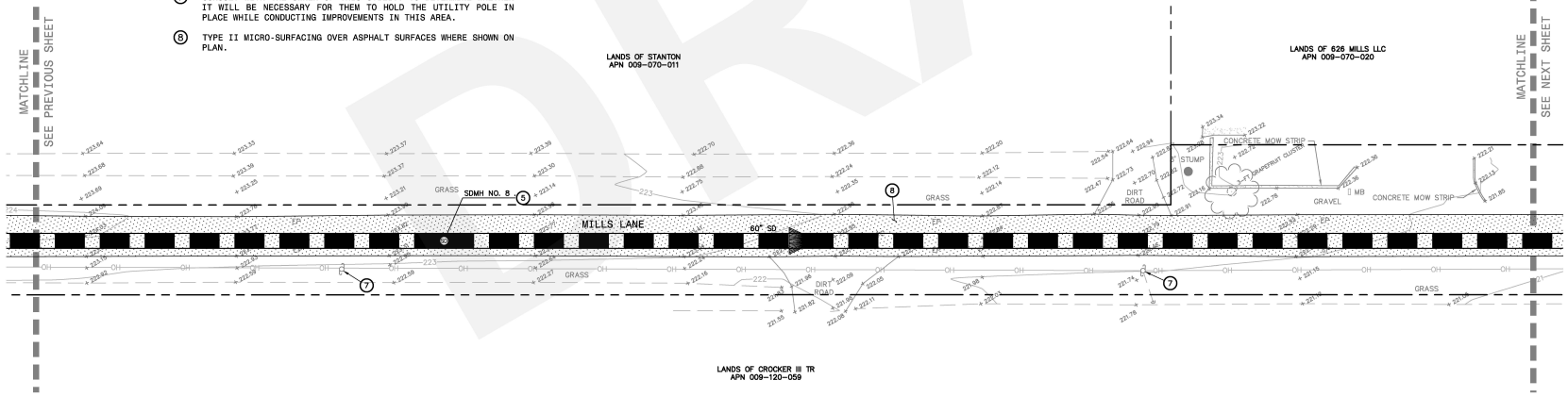
H: 1"=20'
V: 1"=4'

KEYNOTES:

(5) STORM DRAIN MANHOLE IN ACCORDANCE WITH CITY OF ST. HELENA STANDARDS 502 AND 504 HAVING A TRAFFIC RATED FRAME AND COVER.

(7) CONSULT WITH THE OWNER OF THIS UTILITY TO DETERMINE WHETHER IT WILL BE NECESSARY FOR THEM TO HOLD THE UTILITY POLE IN PLACE WHILE CONDUCTING IMPROVEMENTS IN THIS AREA.

(8) TYPE II MICRO-SURFACING OVER ASPHALT SURFACES WHERE SHOWN ON PLAN.



STORM DRAIN PLAN

20 0 20 40
scale 1" = 20' feet

PRELIMINARY
NOT FOR CONSTRUCTION
DATE: 01/19/2021
REBECCA DOWER C 80868

REGISTERED PROFESSIONAL ENGINEER
REBECCA DOWER
No. C 80868
CIVIL
STATE OF CALIFORNIA

75% CONSTRUCTION DOCUMENTS

DATE: JANUARY 2021
DESIGNED BY: EJB
DRAWN BY: BTL
CHECKED BY: BD

PROJECT NO.
R20-02

BKF
200 4th STREET
SUITE 300
SANTA ROSA, CA 95401
(707) 583-8500
www.bkf.com

CITY OF ST. HELENA
PUBLIC WORKS DEPARTMENT
1572 RAILROAD AVE, ST. HELENA, CALIFORNIA, 94574
PH: 707-968-2658

MILLS LANE STORM DRAIN IMPROVEMENTS
STORM DRAIN PLAN AND PROFILE

SHEET
C2.4
7 OF 12

DRAFT

Plot: Jan 19, 2021 at 7:38am
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Figure 13. Storm Drain Plan and Profile (5 of 10)

Mills Lane Storm Drain Improvements Project
St. Helena, California

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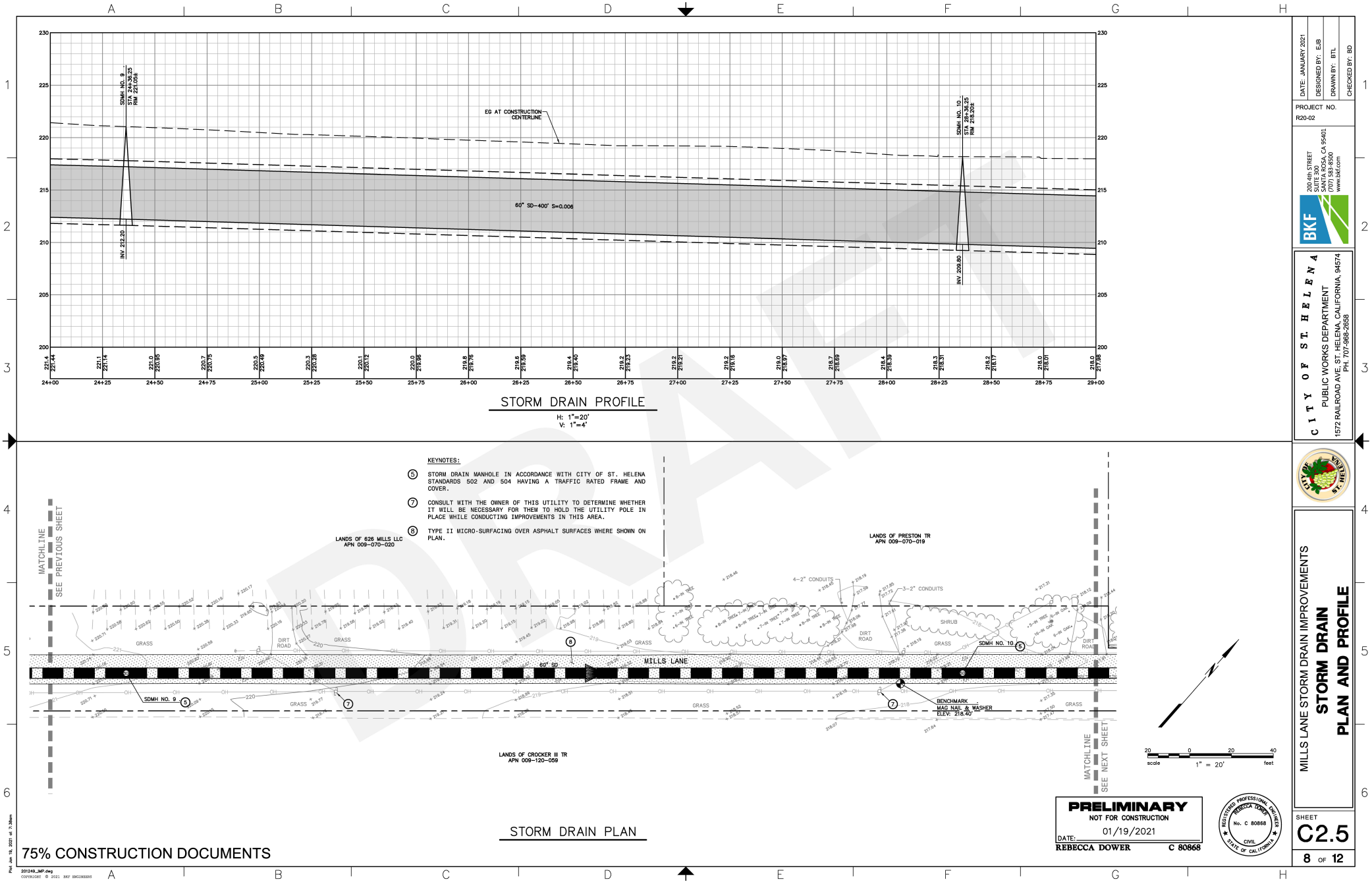


Figure 14. Storm Drain Plan and Profile (6 of 10)

Mills Lane Storm Drain Improvements Project
St. Helena, California

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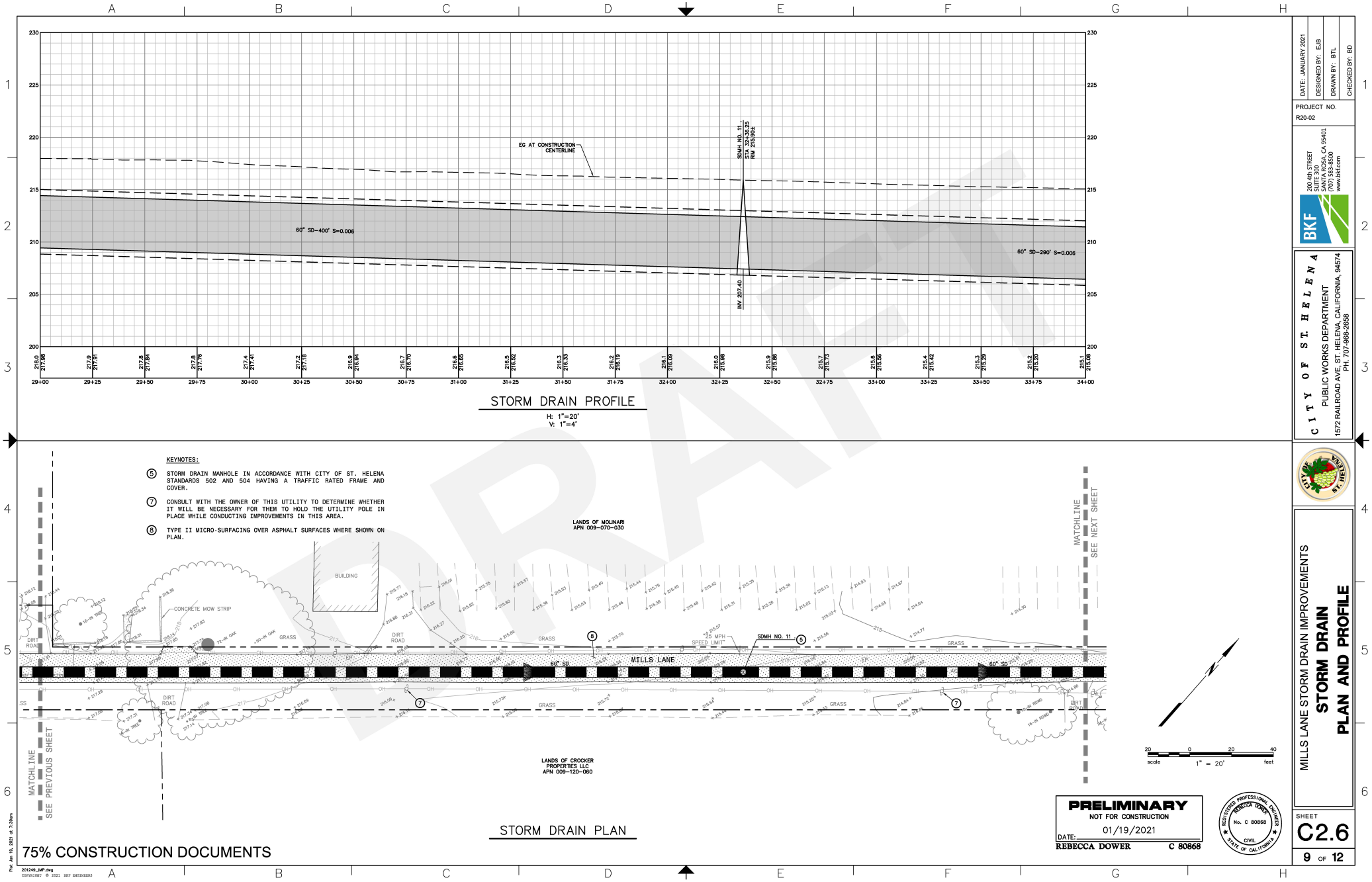


Figure 15. Storm Drain Plan and Profile (7 of 10)

Mills Lane Storm Drain Improvements Project
St. Helena, California

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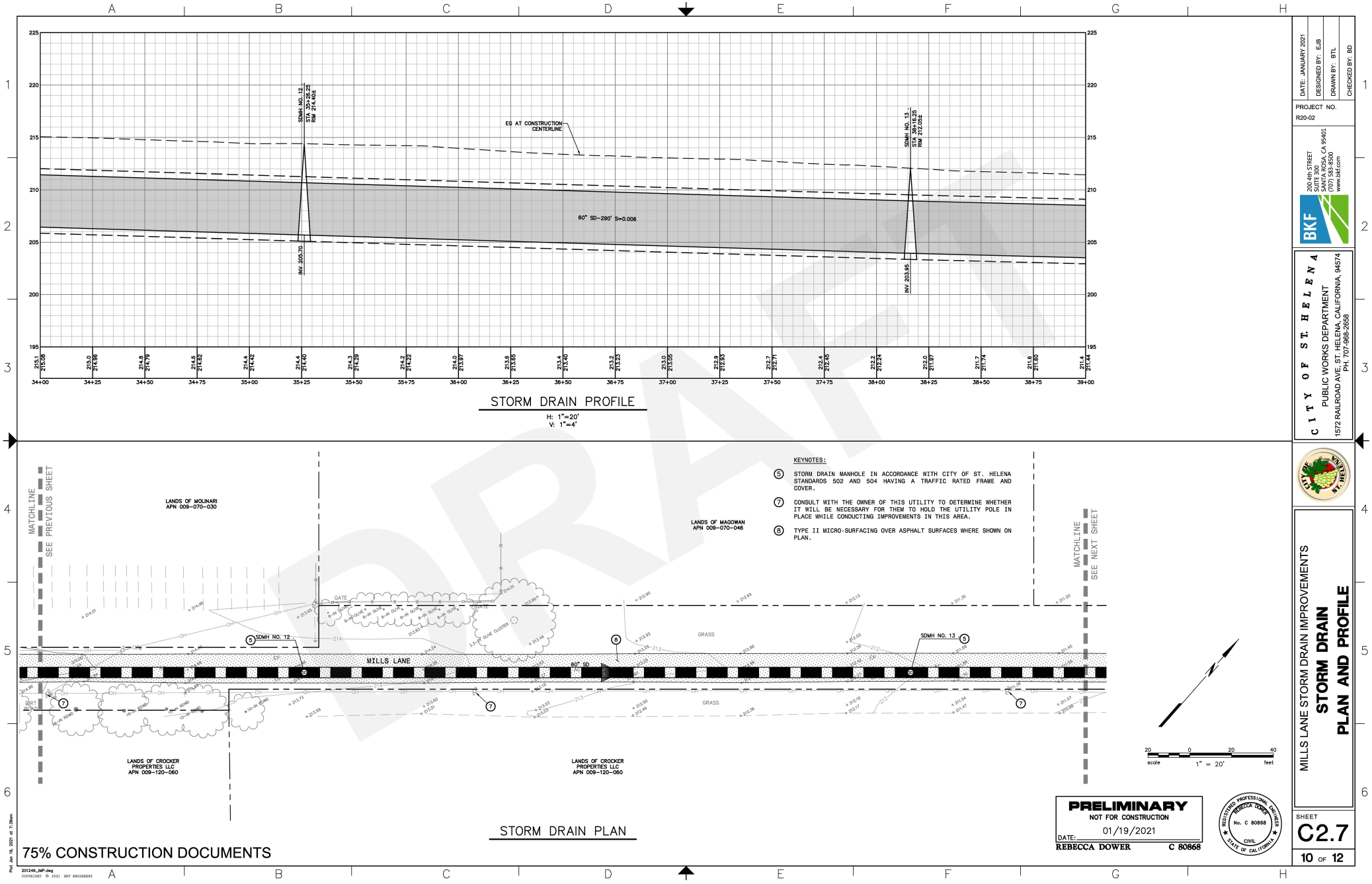


Figure 16. Storm Drain Plan and Profile (8 of 10)

Mills Lane Storm Drain Improvements Project
St. Helena, California

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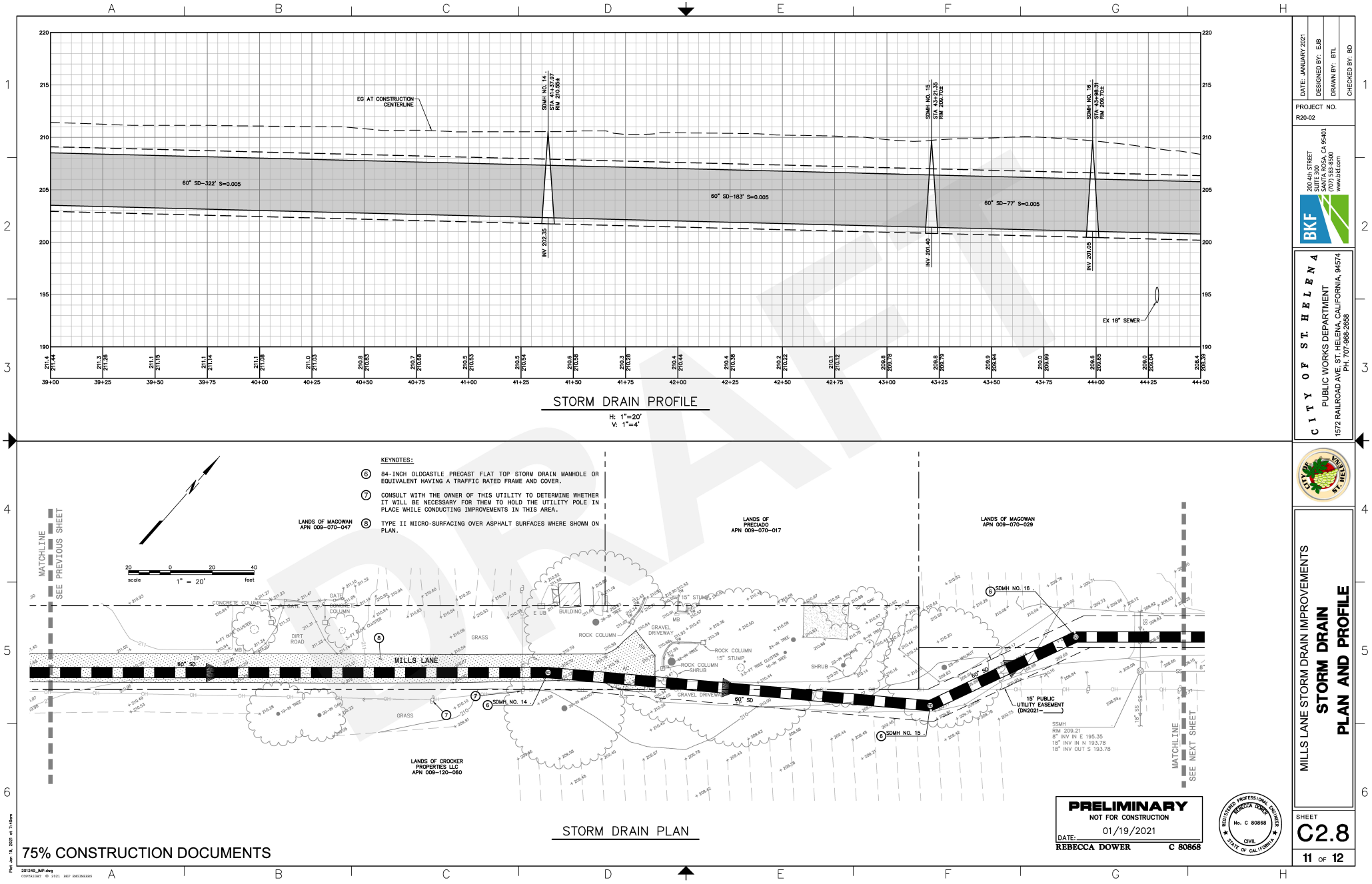


Figure 17. Storm Drain Plan and Profile (9 of 10)

Mills Lane Storm Drain Improvements Project
St. Helena, California

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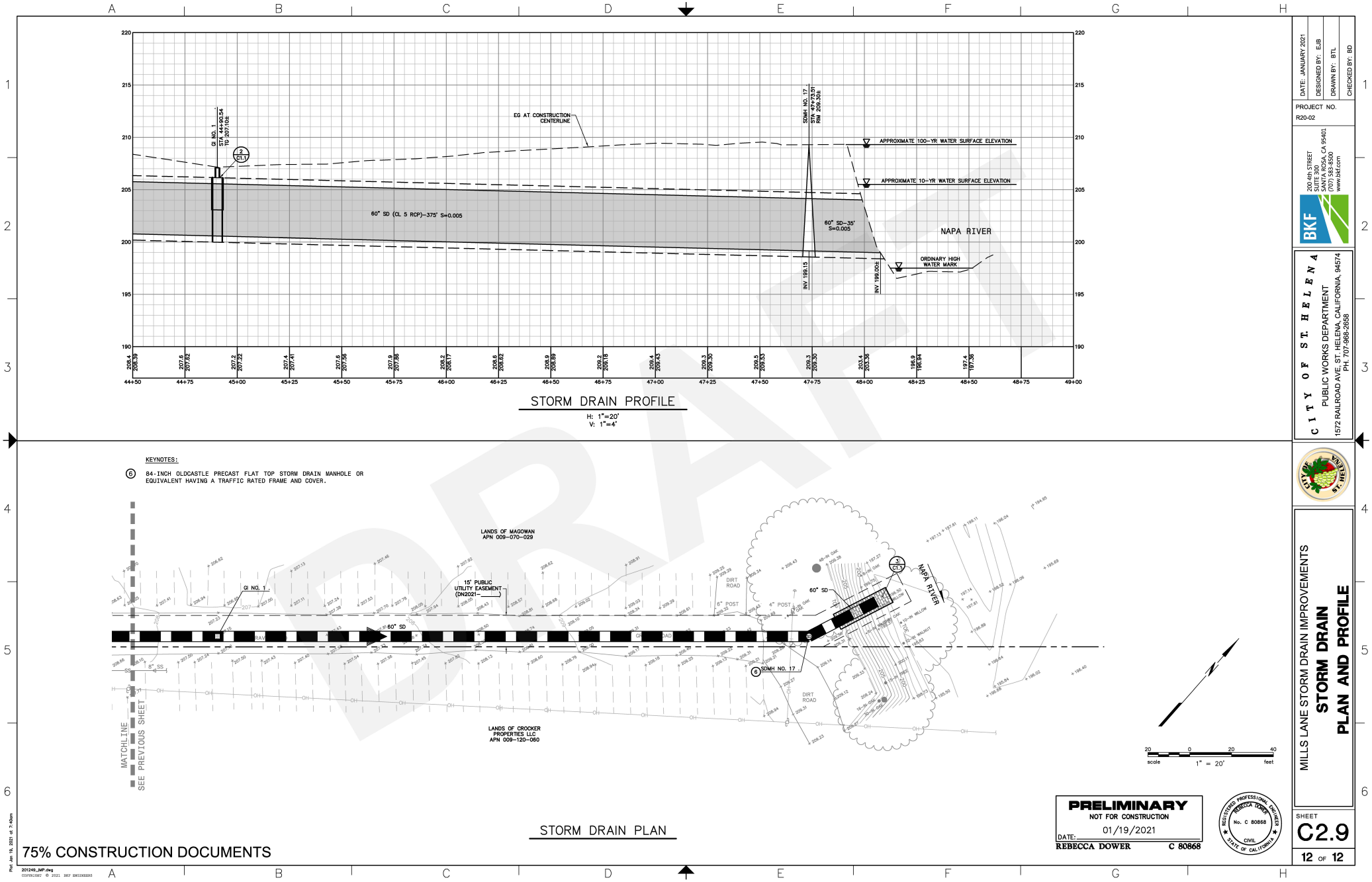


Figure 18. Storm Drain Plan and Profile (10 of 10)

Mills Lane Storm Drain Improvements Project
St. Helena, California

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REQUIRED DISCRETIONARY AND OTHER CITY APPROVALS

- Encroachment Permit

OTHER PUBLIC AGENCY REVIEW REQUIRED

- Cal Trans District 4
- Regional Water Quality Control Board
- California Department of Fish and Game

CONSULTATION UNDER AB 52

In accordance with AB 52 (PRC Section 21084.2), lead agencies are required to consider Tribal Cultural Resources (TCR) including a site feature, place, cultural landscape, sacred place or object, of cultural value to the tribe and is listed on the California Register of Historic Resources (CRHR) or a local register, or the Lead agency, at its discretion, chooses to treat resources as such. AB 52 mandates that a lead agency initiate consultation with a tribe with traditional and/or cultural affiliations in the geographic area where a subject project is located if a project may cause a substantial adverse change in the significance of a tribal cultural resource. Should the tribe respond requesting formal consultation in accordance with the procedural requirements of AB 52, the lead agency must work with the tribe or representative thereof to determine the level of environmental review warranted, identify impacts, and recommend avoidance or mitigation measures to reduce any potential impacts.

In accordance with AB 52, a summary of the proposed Project was mailed to the following local tribes on August 4, 2020:

- Mishewal Wappo Tribe of Alexander Valley

No response was received from the Mishewal Wappo Tribe of Alexander Valley and no other Tribes requested consultation under AB 52.

DOCUMENTS INCORPORATED BY REFERENCE

CEQA Guidelines Section 15150 recognizes the desirability of reducing the volume of documentation necessary for environmental review and authorizes incorporation by reference any portion of relevant documents that provide general background to the environmental document. As such, this Initial Study incorporates the following documents, which were reviewed as part of the analysis of certain topical sections provided herein:

- City of St. Helena, General Plan Update 2040;
- City of St. Helena, Zoning Ordinance, as amended;
- City of St. Helena, Highway 29 Specific Plan; and
- Farmstead at Long Meadow Ranch Projects IS/MND.

Additional documents not reflected in this section are identified and analyzed within the Initial Study. These documents are available for review at the City of St. Helena Planning Department, 1572 Railroad Avenue, St. Helena, CA 94574 and at https://www.cityofsthelena.org/planning/page/planning-uploaded-documents.

ENVIRONMENTAL PROCEDURES AND CHECKLIST

This Initial Study presents a preliminary evaluation of the potential environmental impacts resulting from the Project. The Initial Study was prepared in accordance with the California Environmental Quality Act (Public Resources Code Section 21000-21178.1) and the Guidelines for Implementation of the California Environmental Quality Act (Chapter 3, Title 14, California Code of Regulations of the CEQA Guidelines). This Initial Study considers all aspects of the Proposed Project, as required by Section 15063(a) (1) of the CEQA Guidelines Section 15063(a) (1) of the CEQA Guidelines requires that all phases of project planning, implementation, and operation must be considered in the Initial Study of the project.

The Environmental Checklist provided below, as contained in Appendix G of the CEQA Guidelines, was utilized to focus this Initial Study on the environmental factors that may be impacted or further impacted by implementation of the Proposed Project. Following each of the topical areas presented in the Environmental Checklist, a brief discussion is presented regarding the topical environment setting, the relevance of the proposed Project to the topical environment setting, any and all potential impacts within the topical area and, as appropriate, any mitigation measures necessary to reduce potentially significant impacts to a less-than-significant level.

SUMMARY OF ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below identify "Potentially Significant Impacts" affected by this Project, as indicated by the checklist on the following pages. However, as demonstrated in this Initial Study in the applicable topical sections, mitigations are proposed for incorporation into the Project that will reduce or eliminate these impacts to "Less Than Significant" or "No Impact."

☐ Aesthetics	☐ Greenhouse Gas Emissions	☐ Public Services
☐ Agricultural Resources	☐ Hazards / Hazardous Materials	☐ Recreation
☒ Air Quality	☐ Hydrology / Water Quality	☐ Transportation
☒ Biological Resources	☐ Land Use / Planning	☒ Tribal Cultural Resources
☒ Cultural Resources	☐ Mineral Resources	☐ Utilities / Service Systems
☐ Energy	☐ Noise	☐ Wildfire
☐ Geology / Soils	☐ Population / Housing	☒ Mandatory Findings of Significance

DETERMINATION:

On the basis of this initial evaluation:

☐ I find that the Proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the Proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the Project have been made by or agreed to by the Project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the Proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the Proposed Project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the Proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the Proposed Project, nothing further is required.

_____ Date: September 17, 2021

Edrees Argand, EIT
Assistant Engineer
Public Works Department
City of St. Helena

AESTHETICS	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less- Than-Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	☐	☐	☐	☒

ENVIRONMENTAL SETTING

The City of St. Helena is situated in the relatively narrow valley floor and framed by wooded foothills of the Mayacama and Vaca Mountain ranges located to the west and east, respectively. The valley floor undulates to the north and exhibits a gradual rise in elevation in a northerly direction of approximately 362 Feet above sea level which provides for the occasional interruptions in the vistas as viewed from the City. Foothills are readily visible from most locations in the flatland areas of the City, particularly from east/west oriented streets.

Natural features that contribute to the distinct character of St. Helena include Sulphur Creek, York Creek, the Napa River, and oak and bay wooded hillsides located at the north end of St. Helena and at the base of Howell Mountain Road, east of the Napa River. Agricultural land uses, primarily viticulture, account for approximately 48 percent of the City's land use. As such, the vineyards serve as dynamic visual features and are central in defining the visual character of the City. The long-established urban form within the City limits contrasts with the surrounding natural and agricultural features and provides for a distinct visual character. Notable visual features include distinctive architecture, tree lined streets, and the interspersed vineyards.

The Project involves storm drain improvements along the entirety of Mills Lane in the City of St. Helena in Napa County, CA. The Project site is located on the east side of Main Street (SR 29) in northern St. Helena. The Project site is bounded on the northeast by the Napa River, and agricultural fields to the southeast and southwest. The topography of the Project site is relatively flat.

The area surrounding the Project site consists generally of agricultural land and vineyards, with the Napa River running along the northeastern border of the Project site. Rural residences and winery operations are dispersed around the vicinity of the Project site.

REGULATORY SETTING

California Scenic Highway Program

The California Scenic Highway Program, administered by the California Department of Transportation (Caltrans), intends to preserve and protect scenic highway corridors from change that would diminish the aesthetic value of lands adjacent to scenic highways. The State Scenic Highway System includes a list of highways that are either eligible for designation as scenic highways or have been designated. Cities and counties can nominate eligible scenic highways for official designation by identifying and defining the scenic corridor of the highway. The municipality must also adopt ordinances to preserve the scenic quality of the corridor or document such regulations that already exist in various portions of local codes.

City of St. Helena General Plan Update 2040

Applicable City General Plan goals, policies, and objectives include:

CD1.8 – Require, to the extent feasible, that all new development include underground utilities to minimize their negative visual impact.

CD1.1 – Ensure high-quality design and construction through a robust design review process.

CD5.B – Adopt a dark skyordinance to preserve the City's rural character by limiting the negative effects of light pollution on wildlife and community aesthetics. Develop lighting design guidelines for new development that mitigate light pollution while ensuring adequate nighttime security.

CD5.C – New development shall not result in significant light, glare, and noise that could affect residents, visitors, and wildlife. Lighting shall be shielded to reduce glare and shall be cast downwards. Outdoor lighting shall occur primarily for the purpose of security and safety. Upcast lighting shall be discouraged to minimize impacts on wildlife and toretain the agricultural ambience of St. Helena. All lighting shall conform to the Lighting Zone 2 requirements of Title 24 of the California Building Code.

Highway 29 Specific Plan

The design objectives of the Highway 29 Plan include:

- Promote a high quality of development in the Specific Plan area that is consistent with the design standards required of other recent developments in the city.

The Specific Plan provides numerous guidelines. The following guidelines are intended to apply to development applications within the Specific Plan area in addition to the regulations and purposes in the St. Helena Zoning Ordinance, the remainder of this Specific Plan and the General Plan:

- Grading and fill in the Specific Plan area shall be designed to control stormwater runoff and blend with thenatural environment through careful rounding of the toes and tops of fill. Grading permits that include conditions to this effect shall be required prior to the commencement of any grading operations.

City of St. Helena Municipal Code

Applicable City zoning ordinances include:

Chapter 17.68 – Public and Quasi-Public (PQP) District: All public and quasi-public uses in the PQP district shall require a use permit, public hearing and review. Requirements for landscaping and screening are also incorporated into the PQP district. Pursuant to Chapter 17.164 all signs, new structures or buildings, or exterior revisions of any existing structures or buildings for both permitted and conditional uses shall require design review.

IMPACT ANALYSIS

(a, b) **Less-Than-Significant Impact.** While the Project is located in a visually prominent scenic corridor, it does not contain scenic resources (trees, rock outcroppings or historic buildings) related to a State designated scenic highway as there are no officially designated scenic highways in St. Helena per the Department of Transportation. Therefore, development of the Project site will not impact any State designated scenic highways. State Route 29/State Route 128 is a County-designated scenic roadway; however, the visibility of the proposed Project is softened by several rows of trees along its SR 29/SR 128 viewshed as well as along the Mills Lane frontage. Although the Project site is adjacent to the Napa River and surrounded by scenic vineyards, the visual character of the surrounding area after implementation of the proposed Project would not drastically differ from existing conditions, as the project consists of storm drain improvements below ground. Therefore, impacts to these scenic resources would be less than significant.

(c) **Less-Than-Significant Impact.** There is the potential for temporary impacts to the existing visual quality of the surrounding area during construction. The portion of the site most visible to the majority of the viewers (the view from Highway 29) will be altered temporarily during construction of the storm drain. The temporary change in visual character from construction activities will be minimized by screening trees along SR 29/SR 128 and Mills Lane. Therefore, the Project will have a less than significant impact on the existing visual character. The permanent development of the site would still be consistent with the existing conditions of the site, as the Project consists of constructing a storm drain that will be below ground. These minor construction impacts and overall negligible operational impacts to scenic quality would be less than significant

(d) **No Impact.** Construction of the proposed Project would not create a significant source of light or glare during daytime hours, to which construction activities would be limited. The long-term operation of the Project would not result in the addition of new sources of light or glare. Upon completion of construction, the light and glare conditions at the Project site would be identical to existing conditions. Therefore, there is no impact related to new sources of light or glare adversely affecting day or nighttime views in the area.

MITIGATION MEASURES

None required.

SOURCES

- City of St. Helena General Plan Update 2040; Adopted May 14, 2019.
- City of St. Helena Municipal Zoning Code.
- California Department of Transportation, Scenic Highway Program.
- City of St. Helena Highway 29 Specific Plan, February 22, 2005.

AGRICULTURE/FORESTRY RESOURCES	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☒	☐
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☒	☐
c) 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))?	☐	☐	☒	☐
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☒	☐
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☒	☐

ENVIRONMENTAL SETTING

Agriculture remains one of the dominant land uses in the City of St. Helena and the greater Napa County. Located within the northern portion of the Napa Valley; the majority of the City's land is located on the valley floor, where soils, weather, and water resources are conducive to viticulture. Viticulture serves as the most prolific agricultural use and requires relatively large parcels in contrast to other land uses in St. Helena.

The City of St. Helena promotes the retention of agricultural activities and discourages encroachment into agricultural lands through the application of land use designations directed to maintain large parcels for agricultural use and limiting residential and commercial development within the Urban Limit Line (ULL) and to parcels already designated for such uses.

The proposed Project site is linearly set along Mills Lane (a paved road), and an unpaved farm road extending past the eastern terminus of Mills Lane which leads up to the Napa River corridor. Mills Lane is a City street for most of its length, from its intersection with State Highway 29 east to the Napa River. The land surrounding the Project site is predominantly agricultural, with orchards and vineyards. The Project site is located within Mills Lane which passes land designated as Service Commercial (SC), Industrial (I), Agriculture (A-20), and Winery (W).

The land surrounding the Project site is predominantly agricultural, with orchards and vineyards. There are four rural residences on the north side of Mills Lane. The land on both sides of Mills Lane in the western portion of the Project site consists of fallow fields that are not actively in agricultural production. The eastern end of the Project site terminates within the Napa River corridor. Vegetation in this reach of the river consists of riparian woodland with a dense understory. Historically, land uses in the region have primarily been agricultural, with little change apparent on historical aerial imagery since 1948 (Historical Aerials 2020, Google Earth 2020).

According to California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP), the Project site (Mills Lane) passes through land that is designated as Urban and Built-Up Land, as well as land that is designated as Prime Farmland. The Project site is not under Williamson Act contract.

In accordance with the definition provided in California Public Resources Code Section 12220(g), "forest land" is land that can support, under natural conditions, 10 percent native tree cover of any species, including hardwoods, and that allows for the preservation or management of forest-related resources such as timber, aesthetic value, fish and wildlife, biodiversity, water quality, recreational facilities, and other public benefits. The Project site would not meet the definition of forest land pursuant to Section 12220(g) of the Public Resources Code. None of the land within the Project site is zoned as forest land, timberland zone, or timberland zoned Timberland Production.

REGULATORY SETTING

St. Helena General Plan Update 2040

The City's current General Plan provides the following policy guidelines for agricultural land:

LU5.1 – Discourage conversion of existing farmland to non-agricultural uses.

LU5.3 – Strictly limit development on properties existing at the time of the adoption of this General Plan that are designated as agricultural land.

LU5.5 – Encourage the use of sustainable agricultural practices.

LU5.6 – Permit wineries and other agricultural-related industries to locate in the city if their location does not adversely impact surroundings, uses, or city services (water, traffic, etc.) or the quality and character of the community.

IMPACT ANALYSIS

(a) **Less-Than-Significant Impact.** According to California Department of Conservation's FMMP, the Project site (Mills Lane) passes through land that is designated as Urban and Built-Up Land, as well as land that is designated as Prime Farmland. The proposed Project involves construction of a new storm drain and would not convert farmland to non-agricultural use. The Project consists of a new storm drain that is linearly set along Mills Lane and a dirt road extending past the eastern terminus of Mills Lane. The majority of the Project will occur within Mills Lane, which is a City street for most

of its length, from its intersection with State Highway 29 east to the Napa River. The total length of the proposed storm drain is approximately 4,900 feet. The storm drain will discharge to the west bank of the Napa river approximately 600 feet east of the terminus of Mills Lane. As the proposed Project will not result in the conversion of prime, unique, or farmland of statewide importance and as agricultural uses will continue on-site, this impact is considered less than significant.

(b) **Less-Than-Significant Impact.** The site is located adjacent to lands that are currently used for agricultural production. However, neither the Project site nor the adjacent properties are under a Williamson Act contract. Therefore, the Project impacts to existing agricultural zoning or Williamson Act contracts are considered less than significant.

(c,d) **Less-Than-Significant Impact** The Project consists of a new storm drain that is linearly set along Mills Lane and a dirt road extending past the eastern terminus of Mills Lane. There are a few trees located along Mills Lane, however, these trees are not agricultural resources and are not used for timber production. Implementation of the Project would not result in the conversion of agricultural land to non-agricultural use or forest land to non-forest use. None of the trees near the Project site are used for timber production and no forest resources are located on-site. As a result, the Project will have a less-than-significant impact to timberlands or forest land.

(e) **Less-Than-Significant Impact**. The Project site is surrounded by existing Industrial and Agricultural uses. According to the California Department of Conservation's FMMP, the Project site is surrounded by lands designated as Urban and Built-Up Land and Prime Farmland. None of the lands surrounding the Project site are under a Williamson Act contract. In the absence of forested lands within the Project site, and the absence of forested lands within the vicinity, there is no potential for future development to convert existing forested land to non-forest uses or encourage the loss or conversion of forested land to another use. Therefore, Project impacts associated with the conversion of forestlands are considered less than significant.

MITIGATION MEASURES

None required.

SOURCES

- California Department of Conservation (CDC), Division of Land Resources Protection, Farmland Mapping and Monitoring Program (2016).
- City of St. Helena General Plan Update 2040; Adopted May 14, 2019.
- Google Earth. 2020. St. Helena area: 38.504781°°, - 122.45336°. Image dates: 1993-2018. Accessed: November 2020.
- Historical Aerials. 2020. Available at: http://historicalaerials.com. Accessed: November 2020.

AIR QUALITY	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☒	☐	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

ENVIRONMENTAL SETTING

The Project is located within the San Francisco Bay Area Air Basin (SFBAAB). The SFBAAB has natural characteristics that limit the ability of natural processes to either dilute or transport air pollutants. The major determinants of air pollution transport and dilution are climatic and topographic factors such as wind, atmospheric stability, terrain that influences air movement, and sunshine. Wind and terrain can combine to transport pollutants away from upwind areas, while solar energy can chemically transform pollutants in the air to create secondary photochemical pollutants such as ozone. The City of St. Helena is within a climatological subregion defined by the Napa Valley. The air pollution potential in the Napa Valley could be high if there were sufficient sources of air contaminants nearby. Summer and fall prevailing winds can transport ozone precursors from the south to the Napa Valley. The local upslope and downslope flows created by the surrounding mountains may also recirculate pollutants already present, contributing to buildup of air pollution. The high frequency of light winds and stable conditions during the late fall and winter contribute to the buildup of particulate matter from motor vehicles, agriculture, and wood burning in fireplaces and stoves.[1]

Air Pollutants of Concern

The California Air Resources Board (CARB) and United States Environmental Protection Agency (USEPA) focus on the following air pollutants as regional indicators of ambient air quality:

[1] Bay Area Air Quality Management District (BAAQMD), 2017. CEQA Air Quality Guidelines, May.

- Ozone
- Respirable particulate matter (PM_{10})
- Fine particulate matter ($PM_{2.5}$)
- Nitrogen dioxide
- Carbon monoxide (CO)
- Sulfur dioxide
- Lead

Because these are the most prevalent air pollutants known to be harmful to human health, based on extensive criteria documents, they are referred to as "criteria air pollutants." In the SFBAAB, the primary criteria air pollutants of concern are ground-level ozone formed through reactions of oxides of nitrogen (NOx) and reactive organic gases (ROG), PM_{10}, and $PM_{2.5}$.

In addition to criteria air pollutants, local emissions of toxic air contaminants (TACs), such as diesel particulate matter (DPM), are a concern for nearby receptors. TACs are a broad class of compounds known to cause morbidity or mortality (usually because they cause cancer). TACs are found in ambient air, especially in urban areas, and are caused by specific chemicals used for industry, agriculture, fuel combustion, and commercial operations (e.g., dry cleaners). Because chronic exposure can result in adverse health effects, TACs are regulated at the regional, state, and federal levels.

Sensitive Receptors

Sensitive receptors are groups of people who are more affected by air pollution than others. CARB has identified the following groups of people as sensitive receptors who are most likely to be affected by air pollution: children under 16, the elderly over 65, and people with cardiovascular and chronic respiratory diseases. Locations that may contain sensitive receptors include residential areas, hospitals, daycare facilities, elder care facilities, elementary schools, and parks. The closest sensitive receptors to the project include residences along Mills Lane.

REGULATORY SETTING

Federal and State Regulations

The federal Clean Air Act and the California Clean Air Act mandate the control and reduction of specific air pollutants. Under these Acts, the USEPA and CARB have established ambient air quality standards for criteria air pollutants, designed to protect public health and welfare. The USEPA has classified the SFBAAB region as a nonattainment area for ozone and $PM_{2.5}$. The USEPA has deemed the region as attainment/unclassified for all other air pollutants. At the State level, the SFBAAB is considered nonattainment for ozone, PM_{10} and $PM_{2.5}$.[2]

Regional Regulations

The Bay Area Air Quality Management District (BAAQMD) is primarily responsible for ensuring that the federal and State ambient air quality standards are attained and maintained in the SFBAAB. The BAAQMD fulfills this responsibility by adopting and enforcing rules and regulations concerning air pollutant sources, issuing permits, inspecting stationary sources of air pollutants, responding to citizen complaints, and monitoring ambient air quality and meteorological conditions. The BAAQMD CEQA Air Quality Guidelines include thresholds of significance for emissions of ROG, NOx, PM_{10}, $PM_{2.5}$, local CO, and TACs to assist lead agencies in evaluating and mitigating air quality impacts under CEQA.[3] The scientific soundness of the thresholds is supported by substantial evidence presented in the BAAQMD's Revised Draft Options and Justification Report.[4] The BAAQMD's project-level thresholds are used in this CEQA analysis in conjunction with the BAAQMD's current CEQA Air Quality Guidelines. The thresholds of significance used in this CEQA analysis are summarized in Table 1, below.

[2] Bay Area Air Quality Management District (BAAQMD), 2020. Air Quality Standards and Attainment Status. Available at: https://www.baaqmd.gov/about-air-quality/research-and-data/air-quality-standards-and-attainment-status. Accessed on December 4, 2020.
[3] Bay Area Air Quality Management District (BAAQMD), 2017. CEQA Air Quality Guidelines, May.
[4] Bay Area Air Quality Management District (BAAQMD), 2009. Revised Draft Options and Justification Report; California Environmental Quality Act Thresholds of Significance, October.

Table 1. Air Quality Significance Thresholds

Impact Analysis	Pollutant	Threshold of Significance
Regional Air Quality (Construction)	ROG	54 pounds/day (average daily emission)
	NO_x	54 pounds/day (average daily emission)
	Exhaust PM_{10}	82 pounds/day (average daily emission)
	Exhaust $PM_{2.5}$	54 pounds/day (average daily emission)
	Fugitive Dust (PM_{10} and $PM_{2.5}$)	Best management practices
Regional Air Quality (Operation)	ROG	54 pounds/day (average daily emission) 10 tons/year (maximum annual emission)
	NO_x	54 pounds/day (average daily emission) 10 tons/year (maximum annual emission)
	Exhaust PM_{10}	82 pounds/day (average daily emission) 15 tons/year (maximum annual emission)
	Exhaust $PM_{2.5}$	54 pounds/day (average daily emission) 10 tons/year (maximum annual emission)
Local Community Risks and Hazards (Operation and/or Construction)	CO	9.0 ppm (8-hour average) 20.0 ppm (1-hour average)
	Exhaust $PM_{2.5}$ (project)	0.3 µg/m^3 (annual average)
	Exhaust $PM_{2.5}$ (cumulative)	0.8 µg/m^3 (annual average)
	TACs (project)	Cancer risk increase > 10 in 1 million Chronic hazard index > 1.0
	TACs (cumulative)	Cancer risk > 100 in 1 million Chronic hazard index > 10.0

Note: ppm = part per million; µg/m^3 = micrograms per cubic meter

Source: Bay Area Air Quality Management District (BAAQMD), 2017. CEQA Air Quality Guidelines, May.

In accordance with the California Clean Air Act, the BAAQMD is required to prepare and update an air quality plan that outlines measures by which both stationary and mobile sources of pollutants can be controlled to achieve the federal and State ambient air quality standards in areas designated as nonattainment. In April 2017, the BAAQMD adopted the *2017 Clean Air Plan: Spare the Air, Cool the Climate* (2017 CAP), which includes 85 control measures to reduce ROG, NOx, PM_{10}, $PM_{2.5}$, TACs, and greenhouse gases (GHGs).[5] The 2017 CAP was developed based on a multi-pollutant evaluation method that incorporates well-established studies and methods on quantifying the health benefits and air quality regulations, computer modelling and analysis of existing air quality monitoring data and emission inventories, and growth projections prepared by the Metropolitan Transportation Commission and the Association of Bay Area Governments.

St. Helena General Plan Update 2040

The City of St. Helena General Plan Update 2040 includes a discussion relevant to air pollution and hazardous materials in the Public Health, Safety, and Noise Element. The Air Quality topic area includes the following policies that are applicable the proposed Project:

PS1.1 – Achieve and maintain clean, healthy air for the residents of St. Helena to preserve environmental quality and community health.

PS1.2 – Support regional efforts to achieve and maintain state ambient concentration standards to

[5] Bay Area Air Quality Management District (BAAQMD), 2017. 2017 Clean Air Plan: Spare the Air, Cool the Climate, April 19.

protect public health, reduce adverse industrial plant effects, and enhance the visual environment. In particular, provide local support for implementation of policies and measures set forth in the Napa County Congestion Management Program.

PS1.3 – Encourage effective regulation of those sources of air pollution, both inside and outside of St. Helena, which affect air quality, by implementing as many of the recommendations of the Napa County Congestion Management Plan as is feasible.

The Air Quality topic area also includes the following actions that are applicable to the proposed Project.

PS1.A – Minimize local adverse air quality impacts related to construction by requiring dust abatement procedures for local projects.

PS1.C – Review project proposals for their potential to generate hazardous air pollutants.

PS1.G – Adopt the thresholds of significance contained in the Bay Area Air Quality Management District's (BAAQMD) Guidelines for Assessing the Impacts of Projects and Plans for determining the significance of project impacts under the California Environmental Quality Act.

Highway 29 Specific Plan

In 2005, the City of St. Helena adopted the Highway 29 Specific Plan to support planned land uses in the Specific Plan area, to protect natural resources within and adjacent to the Specific Plan area, to allow extension of infrastructure and facilities to the Specific Plan area using a financing plan, and to implement procedures for future subdivisions of land, design review, and environmental review. The actions below are intended to reduce the effects of Specific Plan development on air which is essential to maintaining St. Helena's high quality of life for both residents and workers. Because of the importance of these issues, individual projects are strongly encouraged to incorporate additional safeguards into their development proposals wherever feasible.

1. All projects involving grading and/or construction shall adopt recognized dust control measures sufficient to reduce emissions of Particulate Matter-10 microns (PM_{10}) to less-than-significant levels. Such measures may include the following, as well as additional measures as deemed appropriate by the City Engineer:

    - Watering construction sites as necessary using recycled water treated with a dust palliative or suppressant;
    - Enclosing, covering, watering, or applying non-toxic soil binders to stockpiles of soil, sand and other materials that can be blown by the wind when not in use;
    - Covering all trucks hauling soil, sand and other loose materials, or requiring all trucks to maintain at least two feet of freeboard;
    - Paving, applying water as necessary, or applying non-toxic soils stabilizers to all unpaved access roads,
      parking areas and staging areas at construction sites'
    - Sweeping all paved access roads, parking areas and staging areas at construction sites daily, preferably with water sweepers;
    - Sweeping streets daily if visible soil material is carried onto adjacent public streets, preferably with water sweepers;
    - Hydroseeding or applying non-toxic soil stabilizers to inactive construction areas;
    - Enforcing a speed limit of 15 mph on unpaved roads;
    - Installing silt fences or other erosion control measures to prevent silt runoff to public roadways; and
    - Replanting vegetation in disturbed areas as quickly as possible.

IMPACT ANALYSIS

(a) **Less-Than-Significant Impact.** Based on the BAAQMD's current CEQA Air Quality Guidelines, the following criteria should be considered to determine if a project would conflict with or obstruct

implementation of the 2017 CAP:

- Does the project include applicable control measures from the air quality plan?
- Does the project disrupt or hinder implementation of any air quality plan control measures?
- Does the project support the primary goals of the air quality plan?

The 2017 CAP includes control measures that aim to reduce air pollution and GHGs from stationary, area, and mobile sources. The control measures are organized into nine categories: stationary sources, transportation, buildings, energy, agriculture, natural and working lands, waste, water, and super-GHG pollutants (e.g., methane, black carbon, and fluorinated gases). As described in Table 2, the Project would be consistent with applicable control measures from the 2017 CAP. Because the Project would not result in any significant and unavoidable air quality impacts related to emissions, ambient concentrations, or public exposures (see subsections b-d below and Greenhouse Gas Emissions Section), the Project supports the primary goals of the 2017 CAP and the impact would be less than significant.

Table 2. Project Consistency with BAAQMD's 2017 CAP

Impact Analysis	Project Consistency
Stationary Source	The stationary source measures, which are designed to reduce emissions from stationary sources, are incorporated into rules adopted by the BAAQMD and then enforced by the BAAQMD's Permit and Inspection programs. Since the project would not create any new stationary sources on the project site, the stationary source control measures of the 2017 CAP are not applicable to the project.
Transportation	The transportation control measures are designed to reduce vehicle trips, use, miles traveled, idling, or traffic congestion for the purpose of reducing vehicle emissions. The proposed Project would not generate additional trips compared to the existing conditions. Therefore, the project would be consistent with the goals for transportation control in the 2017 CAP.
Energy	The energy control measures are designed to reduce emissions of criteria air pollutants, TACs, and GHGs by decreasing the amount of electricity consumed in the Bay Area, as well as decreasing the carbon intensity of the electricity used by switching to less GHG-intensive fuel sources for electricity generation. Since these measures apply to electrical utility providers and local government agencies (and not individual projects), the energy control measures of the 2017 CAP are not applicable to the project. Furthermore, project operation would require minimal consumption of electricity. Therefore, the energy control measures of the 2017 CAP are not applicable to the project.
Buildings	The BAAQMD has authority to regulate emissions from certain sources in buildings such as boilers and water heaters, but has limited authority to regulate buildings themselves. Therefore, the building control measures focus on working with local governments that have authority over local building codes to facilitate adoption of best GHG control practices and policies. The proposed Project does not include construction of new buildings. Therefore, the building control measures of the 2017 CAP are not applicable to the project.
Agriculture	The agriculture control measures are designed primarily to reduce emissions of methane. Since the project does not include any agricultural activities, the agriculture control measures of the 2017 CAP are not applicable to the project.
Natural and Working Lands	The control measures for the natural and working lands sector focus on increasing carbon sequestration on rangelands and wetlands, as well as

	encouraging local governments to adopt ordinances that promote urban tree plantings. Since the project does not include the disturbance of any rangelands or wetlands, the natural and working lands control measures of the 2017 CAP are not applicable to the project.
Waste Management	The waste management measures focus on reducing or capturing methane emissions from landfills and composting facilities, diverting organic materials away from landfills, and increasing waste diversion rates through efforts to reduce, reuse, and recycle. The project would generate minimal amount of waste. Therefore, the waste management measures are not applicable to the project.
Water	The water control measures to reduce emissions from the water sector will reduce emissions of criteria pollutants, TACs, and GHGs by encouraging water conservation, limiting GHG emissions from publicly owned treatment works (POTWs), and promoting the use of biogas recovery systems. The proposed Project would replace the existing storm drain and upgrade the infrastructure, and improve the stormwater discharge in the project vicinity. Because the project would not include changes to the operations of the POTW water distribution system, the water control measures of the 2017 CAP are not applicable to the project.
Super GHGs	The super-GHG control measures are designed to facilitate the adoption of best GHG control practices and policies through the BAAQMD and local government agencies. Since these measures do not apply to individual projects, the super-GHG control measures of the 2017 CAP are not applicable to the project.

Source: Bay Area Air Quality Management District (BAAQMD), 2017. CEQA Air Quality Guidelines, May.

(b) **Less-Than-Significant with Mitigation Measure Incorporated.**

Construction Emissions

Construction of the Project would generate criteria pollutant emissions that could potentially affect regional air quality. The primary pollutant emissions of concern would be ROG, NOx, PM_{10}, and $PM_{2.5}$ from the exhaust of off-road construction equipment and on-road construction vehicles (worker vehicles, vendor trucks, and haul trucks). In addition, fugitive dust emissions of PM_{10} and $PM_{2.5}$ would be generated by soil disturbance activities, and fugitive ROG emissions would result from paving activities.

The BAAQMD recommends using the most recent version of the California Emissions Estimator Model (CalEEMod version 2016.3.2) to estimate construction and operational emissions of pollutants for a proposed Project. CalEEMod uses widely accepted models for emission estimates combined with appropriate default data for a variety of land use projects that can be used if site-specific information is not available. The default data (e.g., power of construction equipment) are supported by substantial evidence provided by regulatory agencies and a combination of statewide and regional surveys. The primary input data used to estimate emissions associated with construction of the proposed Project are provided by the project applicant and contain information on construction phase duration, off-road construction equipment associated with each phase, and the number of workers on site during each phase. A summary of construction input parameters for estimating construction emissions is provided in Table 3. Construction information provided by the Project applicant and a copy of the CalEEMod report for the proposed Project, which summarizes the input parameters, assumptions, and findings, is provided in Appendix D. To determine if the project construction emissions could substantially contribute to existing violations of federal and/or state ambient air quality standards in the SFBAAB, the project's emissions are compared to the BAAQMD's thresholds of significance.

Table 3. Construction Assumptions and Changes to Default Data

CalEEMod Input Category	Construction Assumptions and Changes to Default Data
Construction Phases	Construction phases include trench excavation and pipe laying, grubbing, and paving. The duration of each phase was provided by the Project applicant and is included in Appendix D.
On-Site Construction Equipment	Only the trench excavation and pipe laying phase and the paving phase would include on-site heavy construction equipment. The on-site construction equipment was modified according to site-specific construction information provided by the project applicant. It was conservatively assumed that each piece of equipment would operate 8 hours a day during the entire phase.
Material Movement	Approximately 12,000 cubic yards of soil and 2,000 cubic yards of pavement materials would be exported during the excavation and pipe lying phase. Approximately 2,000 cubic yards of pavement materials would be imported during the paving phase.
Worker Trips	According to the construction information provided by the Project applicant, there would be 4 workers per day during the entire construction period.

Note: Detailed CalEEMod data used for all other parameters included in Appendix A.

Construction Fugitive Dust Emissions

Impact AIR-1: Fugitive dust emissions during construction of the proposed Project could affect a substantial number of people.

Project construction would result in fugitive dust emissions during soil disturbance activities, which could result in a potentially significant impact in relation to ambient air quality standards. As discussed above, the Highway 29 Specific Plan recommends individual projects in the Plan area to incorporate dust control measures wherever feasible. The BAAQMD does not have a quantitative threshold of significance for fugitive dust emissions; however, the BAAQMD considers implementation of dust control measures during construction sufficient to reduce air quality impacts from fugitive dust to a less-than-significant level. More specifically, the BAAQMD recommends that all construction projects implement the Basic Construction Mitigation Measures from the BAAQMD's CEQA Air Quality Guidelines to reduce emissions of fugitive dust (regardless of the estimated emissions). The BAAQMD's Basic Construction Mitigation Measures for controlling dust are consistent with the control measures recommended by the Highway 29 Specific Plan, and are included in Mitigation Measure AQ-1, below.

Mitigation Measure AQ-1. Construction Dust and Exhaust Control: During any construction period ground disturbance, the applicant shall ensure that the Project contractor implement measures to control dust and exhaust, as recommended by the Bay Area Air Quality Management District (BAAQMD). All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.

1. All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
2. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
3. All vehicle speeds on unpaved roads shall be limited to 15 miles per hour (mph).
4. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
5. Idling times shall be minimized 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.

6. All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.

7. Post 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.

In addition, an independent construction monitor shall conduct periodic site inspections, but in no event fewer than four total inspections, during the course of construction to ensure these mitigation measures are implemented and shall issue a letter report to the City of St. Helena documenting the inspection results. Reports indicating non-compliance with construction mitigation measures shall be cause to issue a stop-work order until such time as compliance is achieved. (LTS)

Implementation of Mitigation Measure AQ-1 would reduce fugitive dust impacts to a less-than-significant level.

Construction ROG, NOx and Exhaust PM_{10} and $PM_{2.5}$ Emissions

Estimates of construction emissions were averaged over the total working days and compared to the BAAQMD's thresholds of significance in Table 4. The project's estimated emissions for ROG, NOx, and exhaust PM_{10} and $PM_{2.5}$ were below the applicable thresholds. Therefore, project construction would not result in a considerable net increase in ozone and particulate matter concentrations for which the region is non-attainment under federal and State ambient air quality standards and the associated impact would be less than significant.

Table 4. Estimated Project Construction Emissions (Pound per Day)

	ROG	NOx	Exhaust PM_{10}	Exhaust $PM_{2.5}$
Construction Emissions	0.6	8.1	0.25	0.23
BAAQMD's Threshold of Significance	54	54	82	54
Exceed Threshold?	No	No	No	No

Note: Detail CalEEMod data used for all other parameters not described.
Source: Appendix A.

Operational Emissions

Operation of the proposed Project would only include occasional inspection of the outfall and the storm drain, and clearing of the storm drain. Therefore, criteria air pollutant emissions from project operations would be negligible. The project operation would not result in a considerable net increase in ozone and particulate matter concentrations for which the region is non-attainment under federal and State ambient air quality standards, and the associated impact would be less than significant.

(c) **Less-Than-Significant with Mitigation Incorporated.**

Localized Carbon Monoxide Concentrations

The occurrence of localized CO concentrations, also known as "hotspots," can affect sensitive receptors in local communities. The source of local CO emissions is often associated with heavy

traffic congestion, which most frequently occurs at signalized intersections of high-volume roadways. The BAAQMD's threshold of significance for local CO concentrations is equivalent to the 1- and 8-hour California Ambient Air Quality Standards of 20.0 and 9.0 parts per million, respectively, because these represent levels that are protective of public health. Operation of the proposed Project would include infrequent vehicle trips associated with storm drain inspection and cleaning. According to the BAAQMD CEQA Guidelines, since operation of the proposed Project would not generate more than 44,000 vehicles per hour at the affected intersections, the Project would not be expected to increase local CO levels above the thresholds. Therefore, the Project would have a less-than-significant impact on nearby sensitive receptors exposed to local CO concentrations.

Toxic Air Contaminants from Construction

Impact AIR-2: Construction of the proposed Project could expose sensitive receptors to substantial concentrations of $PM_{2.5}$.

Project construction would generate diesel particulate matter (DPM) and $PM_{2.5}$ emissions from off-road diesel construction equipment and on-road vehicles traveling to and from the project site, and these emissions could affect nearby sensitive receptors. The annual average concentrations of DPM and $PM_{2.5}$ concentrations were estimated within 1,000 feet of the proposed Project using the USEPA Industrial Source Complex Short Term (ISCST3) air dispersion model.[6] For this analysis, emissions of exhaust PM_{10} were used as a surrogate for DPM. Because the project is a linear construction project, the exhaust from off-road equipment and on-road haul trucks were represented in the ISCST3 model as a line-area source along Mills Lane, approximately 4,900 feet long, with a side length of 9 meters and a release height of 3 meters to represent the mid-range of the expected plume rise from frequently used construction equipment. Dispersion of air pollutants from off-road and on-road construction equipment was modeled using a unit emission rate (e.g., 1 gram per second). The annual average concentration profiles from the air dispersion model were then scaled according to the ratio between the unit emission rate and the actual emission rate of project construction. The actual emission rate was conservatively based on total construction emissions (including those emitted by on-road construction vehicles outside of the project vicinity) averaged over the entire duration of the construction phases involving heavy construction equipment. Daily emissions from construction were assumed to occur from 8AM to 5PM Monday through Friday.

A uniform grid of receptors spaced 20 meters apart with receptor heights of 1.8 meters was encompassed around the project site as a means of developing isopleths (i.e., concentration contours) that illustrate the air dispersion pattern from the various emission sources. Terrain variation on and near the project site was incorporated in the ISCST3 model to assign elevations to the emission sources and receptors, based on the National Aeronautics and Space Administration Shuttle Radar Topography Mission Version 3.0 elevation data at 1-second resolution. The ISCST3 model input parameters included 3 years of BAAQMD meteorological data at the Napa weather station located about 17 miles south of the Project site.

Based on the results of the air dispersion model (Appendix D), potential health risks were evaluated for the maximally exposed individual resident (MEIR) located at a single-family home directly adjacent and to the north side of the project site. In accordance with the guidance from the BAAQMD[7] and the Office of Environmental Health Hazard Assessment,[8] a health risk assessment was conducted to calculate the incremental increase in cancer risk and chronic hazard index (HI) to the MEIR from DPM emissions during construction. Analysis of acute non-cancer

[6] U.S. Environmental Protection Agency (USEPA), 1995. Industrial Source Complex Short Term (ISCST3) Air Dispersion Model.
[7] Bay Area Air Quality Management District (BAAQMD), 2016. Air Toxics NSR Program, Health Risk Assessment Guidelines, December.
[8] Office of Environmental Health Hazard Assessment (OEHHA), 2015. Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments, February.

health hazards from construction activity is not recommended by BAAQMD, nor has a reference exposure level been approved by OEHHA and CARB. The annual average concentration of DPM and $PM_{2.5}$ at the MEIR was used to conservatively assess potential health risks to nearby sensitive receptors. At the MEIR location, the incremental increase in cancer risk from on-site DPM emissions during construction was assessed for a fetus exposed to DPM for 62 work days (2.8 months) starting from in utero in the third trimester of pregnancy. This exposure scenario represents the most sensitive individuals who could be exposed to adverse air quality conditions in the vicinity of the project site. The input parameters and results of the health risk assessment are included in Appendix D.

Estimated health risks at the MEIR from exposure to DPM and $PM_{2.5}$ concentrations during construction of the proposed Project are summarized and compared to the BAAQMD's thresholds of significance in Table 5. The estimated unmitigated excess cancer risk and the chronic HI at the MEIR were below the BAAQMD's thresholds of significance. However, the annual average $PM_{2.5}$ concentrations at the MEIR exceed the BAAQMD's threshold of significance. As a result, the proposed Project could have a potentially significant impact on existing sensitive receptors exposed to TACs from Project construction.

Table 5. Health Risks and Hazards at the Maximally Exposed Individual Resident (MEIR) During Project Construction

	Diesel Particulate Matter		Exhaust PM_{10}
	Cancer Risk (per million)	**Chronic Hazard Index (HI)**	**Annual Average Concentration ($\mu g/m^3$)**
Unmitigated Construction	6.5	0.1	0.55
Mitigated Construction with Mitigation Measure AQ-2	1.7	<0.1	0.14
Threshold of Significance	10	1	0.3
Exceed Threshold with Mitigation Measure AQ-2?	No	No	No

Note: $\mu g/m^3$ = micrograms per cubic meter.
Source: Appendix A.

Equipping all off-road diesel equipment with more than 25 horsepower with Tier 2 or higher engines and the most effective Verified Diesel Emission Control Strategies available for particulate matter, such as Level III diesel particulate filters, would reduce the project's $PM_{2.5}$ emissions by approximately 70 percent. Tier 4 Final engines do not need to install Verified Diesel Emission Control Strategies because they already meet the emission standards for lower tiered equipment with installed controls. Therefore, the project shall implement Mitigation Measure AIR-2 to control diesel exhaust during construction.

> Mitigation Measure AQ-2. Construction Equipment Requirement**:** During Project construction, the contractor shall ensure that all off-road diesel equipment with more than 25 horsepower be equipped with Tier 2 or higher engines certified by the California Air Resources Board. In addition, all off-road diesel equipment with more than 25 horsepower (except for Tier 4 Final engines) shall be equipped with the most effective Verified Diesel Emission Control Strategies available for particulate matter (e.g., Level III diesel particulate filters) and certified by the California Air Resources Board. Contract specifications shall include this requirement prior to the start of construction. (LTS)

As shown in Table 5, implementation of these exhaust control measures under Mitigation Measure AQ-2 would reduce the annual average $PM_{2.5}$ concentrations below the threshold of significance.

Therefore, implementation of Mitigation Measure AQ-2 would reduce the health risk impact on sensitive receptors from project construction to a less-than-significant level.

Toxic Air Contaminants from Operation

Project operations would not introduce a new stationary source of TAC emissions. Therefore, project operations would have no impact on nearby sensitive receptors related to substantial pollutant concentrations.

Cumulative TAC Emissions

The project site is located in a suburban area. There is no existing stationary source or foreseeable future source of TACs within 1,000 feet of the MEIR according to the BAAQMD.[9] Therefore, the cumulative impact on nearby sensitive receptors from exposure to TAC and $PM_{2.5}$ emissions during construction of the proposed Project would be less than significant.

(d) **Less-Than-Significant Impact.** Project construction and operation would not be expected to generate significant odors because the project would not include handling or generation of noxious materials. Therefore, project impacts related to odors would be less than significant.

MITIGATION MEASURES

Mitigation Measure AIR-1: Construction Dust and Exhaust Control: During any construction period ground disturbance, the applicant shall ensure that the Project contractor implement measures to control dust and exhaust, as recommended by the Bay Area Air Quality Management District (BAAQMD).All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.

1. All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
2. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
3. All vehicle speeds on unpaved roads shall be limited to 15 miles per hour (mph).
4. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
5. Idling times shall be minimized 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.
6. All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
7. Post 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.

In addition, an independent construction monitor shall conduct periodic site inspections, but in no event fewer than four total inspections, during the course of construction to ensure these mitigation measures are implemented and shall issue a letter report to the City of St. Helena documenting the inspection results. Reports indicating non-compliance with construction mitigation measures shall be cause to issue a stop-work order until such time as

[9] Bay Area Air Quality Management District (BAAQMD), 2021. Email correspondence titled: Request for information for stationary sources of TAC, between Ivy Tao at Baseline Environmental Consulting and Areana Flores at the BAAQMD. April 20.

compliance is achieved. (LTS)

Mitigation Measure AIR-2: Construction Equipment Requirement**:** During Project construction, the contractor shall ensure that all off-road diesel equipment with more than 25 horsepower be equipped with Tier 2 or higher engines certified by the California Air Resources Board. In addition, all off-road diesel equipment with more than 25 horsepower (except for Tier 4 Final engines) shall be equipped with the most effective Verified Diesel Emission Control Strategies available for particulate matter (e.g., Level III diesel particulate filters) and certified by the California Air Resources Board. Contract specifications shall include this requirement prior to the start of construction. (LTS)

IMPACT SIGNIFICANCE AFTER MITIGATION

Implementation of the mitigation measure listed above will ensure all impacts to air quality are reduced to a less than significant level.

SOURCES

- Bay Area Air Quality Management District (BAAQMD), 2021. Email correspondence titled: Request for information for stationary sources of TAC, between Ivy Tao at Baseline Environmental Consulting and Areana Flores at the BAAQMD. April 20.
- Bay Area Air Quality Management District (BAAQMD), 2017. CEQA Air Quality Guidelines, May.
- Bay Area Air Quality Management District (BAAQMD), 2017. 2017 Clean Air Plan: Spare the Air, Cool the Climate, April 19.
- Bay Area Air Quality Management District (BAAQMD), 2016. Air Toxics NSR Program, Health Risk Assessment Guidelines, December.
- Bay Area Air Quality Management District (BAAQMD), 2009. Revised Draft Options and Justification Report; California Environmental Quality Act Thresholds of Significance, October.
- California Air Pollution Control Officers Association, 2016. California Emissions Estimator Model (CalEEMod). Version 2016.3.2.
- City of St. Helena General Plan Update 2040; Adopted May 14, 2019.
- City of St. Helena, Highway 29 Specific Plan, February 22, 2005.
- Office of Environmental Health Hazard Assessment (OEHHA), 2015. Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments, February.
- U.S. Environmental Protection Agency (USEPA), 1995. Industrial Source Complex Short Term (ISCST3) Air Dispersion Model.

BIOLOGICAL RESOURCES	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any 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 Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) 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 Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☒	☐
d) 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?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☒	☐	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☒	☐

The following discussion is based, in part, on a Biological Site Assessment report (BSA) prepared for the proposed Project by WRA in May 2021. A copy of the BSA is attached as Appendix C to this Initial Study/Mitigated Negative Declaration. The proposed Project has been designed based on the recommendations of the BSA.

REGULATORY SETTING

Sensitive Land Cover Types

Land cover types are herein defined as those areas of a particular vegetation type, soil or bedrock formation, aquatic features, and/or other distinct phenomenon. Typically, land cover types have identifiable boundaries that can be delineated based on changes in plant assemblages, soil or rock types, soil surface or near-surface hydroperiod, anthropogenic or natural disturbance, topography, elevation, etc. Many land cover types are not considered sensitive or otherwise protected under the environmental regulations discussed here. However, these land cover types typically provide essential ecological and biological functions for plants and wildlife, including, frequently, special-status species. Those land cover types that are considered or protected under one or more environmental regulations are discussed below.

Waters of the United States

The United States Army Corps of Engineers (Corps) regulates "Waters of the United States" under Section 404 of the Clean Water Act (CWA). Waters of the United States are defined in the Code of Federal Regulations (CFR) as waters susceptible to use in commerce, including interstate waters and wetlands, all other waters (intrastate waterbodies, including wetlands), and their tributaries (33 CFR 328.3). Potential wetland areas, according to the three criteria used to delineate wetlands as defined in the Corps Wetlands Delineation Manual (Environmental Laboratory 1987), are identified by the presence of (1) hydrophytic vegetation, (2) hydric soils, and (3) wetland hydrology. Unvegetated waters including lakes, rivers, and streams may also be subject to Section 404 jurisdiction and are characterized by an ordinary high water mark (OHWM) identified based on field indicators such as the lack of vegetation, sorting of sediments, and other indicators of flowing or standing water. Other waters, for example, generally include lakes, rivers, and streams. The placement of fill material into Waters of the United States generally requires a permit from the Corps under Section 404 of the CWA.

Waters of the State

The term "Waters of the State" is defined by the Porter-Cologne Act as "any surface water or groundwater, including saline waters, within the boundaries of the state." The State Water Resources Control Board (SWRCB) and nine Regional Water Quality Control Boards (RWQCB) protect waters within this broad regulatory scope through many different regulatory programs. Waters of the State in the context of a CEQA Biological Resources evaluation include wetlands and other surface waters protected by the *State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State*. The SWRCB and RWQCB issue permits for the discharge of fill material into surface waters through the State Water Quality Certification Program, which fulfills requirements of Section 401 of the CWA and the Porter-Cologne Water Quality Control Act. Projects that require a Clean Water Act permit are also required to obtain a Water Quality Certification. If a project does not require a federal permit, but does involve discharge of dredge or fill material into surface waters of the State, the SWRCB and RWQCB may issue a permit in the form of Waste Discharge Requirements.

Streams, Lakes, and Riparian Habitat

Streams and lakes, as habitat for fish and wildlife species, are subject to jurisdiction by CDFW under Sections 1600-1616 of California Fish and Game Code (CFGC). Alterations to or work within or adjacent to streambeds or lakes generally require a 1602 Lake and Streambed Alteration Agreement. The term "stream", which includes creeks and rivers, is defined in the California Code of Regulations (CCR) as "a body of water that flows at least periodically or intermittently through a bed or channel having banks and supports fish or other aquatic life [including] watercourses having a surface or subsurface flow that supports or has supported riparian vegetation" (14 CCR 1.72). In addition, the term "stream" can include ephemeral streams, dry washes, watercourses with subsurface flows, canals, aqueducts, irrigation ditches, and other means of water conveyance if they support aquatic life, riparian vegetation, or stream-dependent terrestrial wildlife (CDFG 1994). "Riparian" is defined as "on, or pertaining to, the banks of a stream." Riparian vegetation is defined as "vegetation which occurs in and/or adjacent to a stream and is dependent on, and occurs because of, the stream itself" (CDFG 1994). Removal of riparian vegetation also requires a Section 1602 Lake and Streambed Alteration Agreement from CDFW.

Sensitive Natural Communities

Sensitive natural communities not discussed above include habitats that fulfill special functions or have special values. Natural communities considered sensitive are those identified in local or regional plans, policies, regulations, or by the CDFW. CDFW ranks sensitive communities as "threatened" or "very threatened" and keeps records of their occurrences in its California Natural Diversity Database (CNDDB; CDFW 2020). CNDDB vegetation alliances are ranked 1 through 5 based on NatureServe's (2018) methodology, with those alliances ranked globally (G) or statewide (S) as 1 through 3 considered sensitive. Impacts to sensitive natural communities identified in local or regional plans, policies, or regulations or those identified by the CDFW or U.S. Fish and Wildlife Service (USFWS) must be considered and evaluated under CEQA (CCR Title 14, Div. 6, Chap. 3, Appendix G). Specific habitats may also be identified as sensitive in city or county general plans or ordinances.

Special-status Species

Plants

Special-status plants include taxa that have been listed as endangered or threatened, or are formal candidates for such listing, under the federal Endangered Species Act (ESA) and/or California Endangered Species Act (CESA). The California Native Plant Protection Act (CNPPA) lists 64 “rare” or “endangered” and prevents “take”, with few exceptions, of these species. Plant species on the California Native Plant Society (CNPS) Rare and Endangered Plant Inventory (Inventory) with California Rare Plant Ranks (Rank) of 1, 2, and 3 are also considered special-status plant species and must be considered under CEQA. Rank 4 species are typically only afforded protection under CEQA when such species are particularly unique to the locale (e.g., range limit, low abundance/low frequency, limited habitat) or are otherwise considered locally rare. A description of the CNPS Ranks is provided below in Appendices B and C.

Wildlife

As with plants, special-status wildlife includes species/taxa that have been listed or are formal candidates for such under ESA and/or CESA. The federal Bald and Golden Eagle Protection Act provides relatively broad protections to both of North America’s eagle species (bald [*Haliaeetus leucocephalus*] and golden eagle [*Aquila chrysaetos*)] that in some regards are similar to those provided by ESA. The CFGC designates some species as Fully Protected (FP), which indicates that take of that species cannot be authorized through a state permit. Additionally, CDFW Species of Special Concern (species that face extirpation in California if current population and habitat trends continue) are given special consideration under CEQA, and are therefore considered special-status species. In addition to regulations for special-status species, most native birds in the United States, including non-status species, have baseline legal protections under the Migratory Bird Treaty Act of 1918 and CFGC, i.e., sections 3503, 3503.5 and 3513. Under these laws/codes, the intentional harm or collection of adult birds as well as the intentional collection or destruction of active nests, eggs, and young is illegal. For bat species, the Western Bat Working Group (WBWG) designates conservation status for species of bats, and those with a high or medium-high priority are typically given special consideration under CEQA.

Critical Habitat, Essential Fish Habitat, and Wildlife Corridors

Critical habitat is a term defined in the ESA as a specific and formally-designated geographic area that contains features essential for the conservation of a threatened or endangered species and that may require special management and protection. The ESA requires federal agencies to consult with the USFWS to conserve listed species on their lands and to ensure that any activities or projects they fund, authorize, or carry out will not jeopardize the survival of a threatened or endangered species. In consultation for those species with critical habitat, federal agencies must also ensure that their activities or projects do not adversely modify critical habitat to the point that it will no longer aid in the species’ recovery. Note that designated critical habitat areas that are currently unoccupied by the species but which are deemed necessary for the species’ recovery are also protected by the prohibition against adverse modification.

The Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) provides for conservation and management of fishery resources in the U.S. This Act establishes a national program intended to prevent overfishing, rebuild overfished stocks, ensure conservation, and facilitate long-term protection through the establishment of Essential Fish Habitat (EFH). EFH consists of aquatic areas that contain habitat essential to the long-

term survival and health of fisheries, which may include the water column, certain bottom types, vegetation (e.g., eelgrass (*Zostera* spp.)), or complex structures such as oyster beds. Any federal agency that authorizes, funds, or undertakes action that may adversely affect EFH is required to consult with NMFS.

Movement and migratory corridors for native wildlife (including aquatic corridors) as well as wildlife nursery sites are given special consideration under CEQA.

St. Helena General Plan Update 2040

The St. Helena General Plan (St. Helena 2019) regulates natural resource use in the City of St. Helena. The General Plan provides policies and implementing actions in four topic areas including Natural Habitat and Biodiversity, Open Space, Water Quality and Conservation, and Healthy Living Environment.

The following General Plan policies relate to the proposed Project:

OS1.1 – Preserve and enhance St. Helena's riparian corridors for their value in providing wildlife habitat, biodiversity, natural drainage, and visual amenity.

OS1.2 – Prohibit development, alteration, and/or removal of native vegetation from riparian areas. Disallow invasive species that degrade habitat quality.

OS1.3 – Protect and enhance contiguous corridors of riparian vegetation along the Napa River and its tributaries in order to support regional wildlife movement and enhance aquatic habitat.

OS1.4 – Protect natural habitats that have the potential to support rare, endangered, or special-status wildlife and plant species. Control invasive species that degrade habitat quality.

OS1.5 – Restrict development of hillside areas in order to protect wildlife, vegetation, viewsheds, and open space characteristics.

OS1.6 – Manage invasive species that degrade habitat quality, especially along the Napa River and its tributaries.

OS3.1 – Promote stormwater management techniques that minimize surface water runoff in public and private developments. Utilize low impact development techniques to best manage stormwater through conservation, on-site filtration and water recycling, and ensure compliance with the NPDES permit.

OS3.2 – Reduce stormwater runoff in developed areas to protect water quality in creeks. Incorporate sustainable low impact design features in the design of infrastructure.

City of St. Helena Municipal Code

The City of St. Helena Municipal Code (St. Helena 2020) establishes regulations for new development within the city limits. The Municipal Code calls for a setback of 20 feet between building structures and the top-of-bank of any perennial or intermittent stream. Structures of less than 500 square feet are exempt from this requirement, and the public works director has discretion to approve additional modifications.

Highway 29 Specific Plan

- Protect identified endangered and special-status plants and animals and their respective habitats through individual resource management plans prepared for properties containing or adjacent to such resources.
- Protected trees should not be removed or disturbed during project construction, although, due to the location of trees, some loss of trees is anticipated.
- All protected trees shall be identified on preliminary site development plans submitted to the City of St. Helena for approval.

ENVIRONMENTAL SETTING

For the purpose of discussion in this section, the terms "Study area" and "Project site" are defined as follows:

Study area: The area throughout which the assessment was performed, the location of the proposed storm drain line and outfall and surrounding areas, totaling 13.16 acres.

Project site*:* The 1.54-acre Project site encompasses the area evaluated for potential impacts to

sensitive biological resources and includes the proposed storm drain alignment and outfall structure, limit of grading, construction access, and staging areas.

The approximately 13.2-acre Study area is linearly set along Mills Lane and a dirt road extending past the eastern terminus of Mills Lane to the upper bank of the Napa River (Appendix A). It is located in western Napa County, approximately 0.5 miles southeast of downtown St. Helena. It is situated within the Napa Valley floor, perpendicular to the Napa River. The Study area is composed primarily of developed land surrounded by vineyards and coast live oak riparian woodlands above the western bank of the Napa River. Approximately 0.01 acre of oak woodlands are located within the limits of disturbance and may be impacted by construction of stormwater infrastructure. The remainder of the Study area is situated in the developed land cover (i.e., paved road).

The Study area predominantly consists of a paved road surrounded by agricultural land and rural residences. Construction of the storm water outfall will occur within a small portion of the upper stream bank and is not expected to impede wildlife movement within the Napa River corridor. Surrounding oak woodland and riverine habitat will allow for continued localized movement of wildlife. Native resident or migratory fish or wildlife species, established native resident or migratory wildlife corridors, and native wildlife nursery sites would not be significantly affected by the proposed Project.

No special-status plants were observed during the site visit and it was determined that none have the potential to occur in the Study area. Three special-status bats and three special-status birds, as well as non-status birds with baseline legal protections, have the potential to occur in the Project site. In addition, two special-status amphibians, one special-status reptile, and two special-status fishes have a low potential to occur within the Study area vicinity. Mitigation measures and best management practices have been developed and provided herein to avoid impacts to these resources.

Trees

The Project proposes removal of two trees: tree 2922 (city tree) located right at the beginning of Mills Lane, and tree 2905 (willow/riparian tree) located at the Project's outfall location. All trees located in the City right-of-way are covered by Section 17.10 of the St. Helena Municipal Code. Project's that consist of pruning, root pruning, removal or replacement of any trees in the City right-of-way, require a tree permit/contract and encroachment permit/contract.

Land Cover Types

Non-sensitive Cover Types

Developed Area, including Agricultural Land and Ruderal (no vegetation alliance). CDFW Rank: None. Within the Study area, developed portions are composed of paved Mills Lane, unpaved access roads, vineyards and other agricultural land, four residences, landscaping, and other small outbuildings, as well as the construction zone associated with the large building and ruderal vegetation. Vegetation within this land cover type is highly altered, consisting of ornamental tree stands and small, isolated patches of ruderal vegetation consist of disturbance-adapted species. Non-native grass and forb species observed include slim oat (*Avena barbata*), rescue grass (*Bromus catharticus*), chicory (*Cichorium intybus*), foxtail barley (*Hordeum murinum*), johnsongrass (*Sorghum halepense*), filarees (*Erodium* sp.) and wild radish (*Raphanus sativus*). Ornamental trees include valley oak (*Quercus lobata*), Russian olive (*Elaeagnus angustifolia*), and English walnut (*Juglans regia*). The western portion of the Study area contains a stormwater ditch that was constructed in an upland area adjacent to Highway 29. The ditch did not contain water during the December 2020 site visit and supported a mix of ruderal forbs and non-native annual grasses.

Developed areas total 12.86 acres in the Study area. This community is not considered sensitive by City of St. Helena, CDFW, or any other regulatory entity.

Sensitive Land Cover Types including Aquatic Resources

Coast Live Oak Riparian Woodland (*Quercus agrifolia* Woodland Alliance). CDFW Rank: G5 S4: Coast live oak woodlands occur in the outer and inner Coast Ranges, Transverse Ranges, and southern coast from northern Mendocino County south to San Diego County (Sawyer et al. 2009, CNPS 2020b). These woodlands are typically

situated on terraces, canyon bottoms, slopes, and flats underlain by deep, well-drained sandy or loam substrates with high organic content (Sawyer et al. 2009). The Study area contains 0.25 acre of this land cover type in the eastern portion of the Study area along the steep banks of the Napa River.

The dominant trees are coast live oak (*Quercus agrifolia*) and red willow (*Salix laevigata*), with scattered cover of Fremont's cottonwood (*Populus fremontii*) within the streambed. Predominant understory species include Himalayan blackberry (*Toxicodendron diversilobum*), California grape (*Vitis californica*), and cocklebur (*Xanthium strumarium*).

These woodlands provide habitat for numerous common native plants and wildlife, as well as have the potential to support several special-status species associated with woodlands. Coast live oak riparian woodland may be subject to CDFW jurisdiction under Section 1602 of the CFGC. The California Invasive Plant Council (Cal-IPC) is an organization that lists known invasive plants throughout California and designates each species with a rating of "high," "moderate," or "limited" based on an invasive plant's prevalence and ability to spread (Cal-IPC 2020). One "high," two "moderate," and two "limited" species were identified in the Study area.

Intermittent Stream. CWA Section 404/401. Rank: None. The eastern portion of the Study area contains the Napa River and a secondary channel will be avoided by the proposed Project. The nearest aquatic feature is a secondary channel of the Napa River, located approximately 40 feet northwest of the Project site.

This reach of the Napa contains intermittent flows, which run during the wet season into the dry season, and receive subsurface discharges. The bed-and-banks are a mix of finer sediments, with medium to large cobble. Riparian vegetation is present. The streambed was entirely dry during the December 2020 site visit. In addition, historical imagery suggests this reach of the Napa River has been seasonably dry in several recent years (e.g., 2013, 2014, 2016, 2019) during the late fall and early winter since at least 1993 (Google 2020).

All of the streams are likely jurisdictional under Section 404/401 of the CWA and Section 1602 of the CFGC; therefore, it is considered a sensitive aquatic resource.

Special-status Species

Special-status Plant Species

During the site assessment, a WRA botanist evaluated habitat characteristics to determine potential suitability for 42 special-status plant species that have been documented in resource databases within the site vicinity. No special-status plants were observed during the site visit and it was determined that none have the potential to occur in the Study area for one or more of the following reasons:

- Hydrologic conditions (e.g., tidal, riverine) necessary to support the special-status plant species are not present in the Study area
- Edaphic (soil) conditions (e.g., volcanic tuff, serpentine) necessary to support the special-status plant species are not present in the Study area
- Topographic conditions (e.g., north-facing slope, montane) necessary to support the special-status plant species are not present in the Study area
- Unique pH conditions (e.g., alkali scalds, acidic bogs) necessary to support the special-status plant species are not present in the Study area
- Associated natural communities (e.g., interior chaparral, tidal marsh) necessary to support the special-status plant species are not present in the Study area
- The Study area is geographically isolated (e.g., below elevation, coastal environ) from the documented range of the special-status plant species
- Land use history and contemporary management (e.g., absence of mowing or grazing) has degraded the localized habitat necessary to support the special-status plant species

It should be noted that because the site visit was conducted outside of the blooming period for most annual species, it did not constitute a protocol-level rare plant survey. However, the majority of the Study area consists of developed land and the coast live oak riparian woodland on the eastern edge of the Study area does not constitute suitable

habitat for species identified in the database records search. All special-status plant species documented in the vicinity of the Study area and considered during the habitat evaluation are discussed further in Appendix B of the BSA (Appendix C).

Special-status Wildlife Species

A total of 22 special-status wildlife species have been documented in the vicinity of the Study area (CDFW 2020a). Six of these species have a moderate to high potential to occur in the Study area. In addition, five species are aquatic or aquatic for a specific portion of their life history and have potential to occur within the Napa River, which the Project will completely avoid. The remaining 13 species are unlikely or have no potential to occur due to one or more of the following reasons:

- Vegetation habitats (e.g., coast redwood forest, coastal prairie) that provide nesting and/or foraging resources necessary support the special-status wildlife species are not present in the Study area.
- Physical structures and vegetation (e.g., mines, old-growth coniferous trees) necessary to provide nesting, cover, and/or foraging habitat to support the special-status wildlife species are not present in the Study area.
- Host plants (e.g., dog violet, harlequin lotus) necessary to provide larval and nectar resources for the special-status wildlife species are not present in the Study area.
- The Study area is outside (e.g., north of, west of) of the special-status wildlife species documented nesting range.

Pallid bat (*Antrozous pallidus*). CDFW Species of Special Concern, WBWG High Priority. Moderate Potential. Pallid bats are distributed from southern British Columbia and Montana to central Mexico, and east to Texas, Oklahoma, and Kansas. This species occurs in a number of habitats ranging from rocky arid deserts to grasslands, and into higher elevation coniferous forests. Roosts are typically in rock crevices, tree hollows, mines, caves, and a variety of man-made structures, including vacant and occupied buildings. Tree roosting has been documented within snags and basal hollows of conifers, and within bole cavities in oak trees. Pallid bats are primarily insectivorous, feeding on large prey that is usually taken on the ground but sometimes in flight. Prey items include arthropods such as scorpions, ground crickets, and cicadas (WBWG 2018).

Many of the mature trees in the eastern portion of the Study area within the riparian corridor along the Napa River contained hollows and cavities that provide suitable roosting habitat for this species. In addition, when flowing, the Napa River, approximately 200 feet east of the Project site, provides a water source for emerging bats. The open agricultural and ruderal fields also likely support insect prey for pallid bat. CNDDB occurrences are recorded within the vicinity of the Study area (CDFW 2020).

Fringed myotis (*Myotis thysanodes*). WBWG High Priority. Moderate Potential. The fringed myotis ranges through much of western North America from southern British Columbia, Canada, south to Chiapas, Mexico and from Santa Cruz Island in California, east to the Black Hills of South Dakota. This species is found in desert scrubland, grassland, sage-grass steppe, old-growth forest, and subalpine coniferous and mixed deciduous forest. Oak and pinyon-juniper woodlands are most commonly used. The fringed myotis roosts in colonies from 10 to 2,000 individuals, although large colonies are rare. Caves, buildings, underground mines, rock crevices in cliff faces, and bridges are used for maternity and night roosts, while hibernation has only been documented in buildings and underground mines. Tree-roosting has also been documented in Oregon, New Mexico, and California (WBWG 2018).

Many of the mature trees in the eastern portion of the Study area within the riparian corridor along the Napa River contained cavities and peeling bark that provide suitable roosting habitat for this species. In addition, when flowing, the Napa River, approximately 200 feet east of the Project site, provides a water source for emerging bats. The open agricultural and ruderal fields also likely support insect prey for fringed myotis. CNDDB occurrences are recorded within the vicinity of the Study area (CDFW 2020).

Long-eared myotis (Myotis evotis). WBWG Medium Priority. Moderate Potential. The long-eared myotis (bat) is primarily associated with coniferous forest (from sea level to approximately 9,000 feet elevation), but also occurs in

semiarid shrublands, sage scrub, chaparral, and agricultural areas. This species roosts under loose tree bark, in tree hollows, caves, mines, crevices in rocky outcrops, in buildings, under bridges and occasionally on the ground. Long-eared myotis primarily consume beetles and moths, gleaning prey from foliage, trees, rocks, and from the ground (WBWG 2018).

Many of the mature trees in the eastern portion of the Study area within the riparian corridor along the Napa River contained cavities and peeling or loose bark that provide suitable roosting habitat for this species. In addition, when flowing, the Napa River, approximately 200 feet east of the Project site, provides a water source for emerging bats. The open agricultural and ruderal fields also likely support insect prey for long-eared myotis. CNDDB occurrences are recorded within the vicinity of the Study area (CDFW 2020).

White-tailed kite (*Elanus leucurus*). CDFW Fully Protected Species. Moderate Potential. White-tailed kite is resident in open to semi-open habitats throughout the lower elevations of California, including grasslands, savannahs, woodlands, agricultural areas, and wetlands. Vegetative structure and prey availability seem to be more important habitat elements than associations with specific plants or vegetative communities (Dunk 1995). Nests are constructed mostly of twigs and placed in trees, often at habitat edges. Nest trees are highly variable in size, structure, and immediate surroundings, ranging from shrubs to trees greater than 150 feet tall (Dunk 1995). This species preys upon a variety of small mammals, as well as other vertebrates and invertebrates.

The Study area provides suitable year-round habitat for white-tailed kites, including stands of oaks for nesting along Mills Lane and adjacent to Napa River and open fields in close proximity for foraging.

Purple martin (*Progne subis*). CDFW Species of Special Concern. Moderate Potential. The purple martin is an uncommon summer resident in California, breeding in forest and woodlands at low- to mid- elevations throughout much of the state. Nesting occurs primarily in tree cavities; trees selected are usually taller or isolated, with low canopy cover at the nest height, and situated on the upper portions of slopes and/or near bodies of water where large aerial insects (favored prey) are abundant (Shuford and Gardali 2008). Conifers are the most frequently used tree type in northern California. Manmade structures with suitable cavities such as bridges or utility poles are also used.

Several of the large, mature oak and willow trees within the riparian corridor at the eastern edge of the Project site contained tree cavities suitable for nesting. Several of the taller trees within this stand provided low canopy cover and open air space near the cavities. In addition, when flowing, the Napa River likely supports abundant prey for purple martin. One CNDDB occurrence is recorded east of the Study area along the Napa River (CDFW 2020).

Swainson's hawk (*Buteo swainsoni*). State Threatened. Moderate Potential. Swainson's hawk is a summer resident and migrant in California's Central Valley and other scattered low-lying areas inland and near the coast. Nests are constructed of sticks and placed in trees located in otherwise largely open areas. Areas typically used for nesting include the edge of narrow bands of riparian vegetation, isolated patches of oak woodland, lone trees, and also planted and natural trees associated with roads, farmyards and sometimes adjacent residential areas. Foraging occurs in open habitats, including grasslands, open woodlands, and agricultural areas. While breeding, adults feed primarily on rodents (and other vertebrates); for the remainder of the year, large insects (e.g., grasshoppers, dragonflies) comprise most of the diet. In many areas, Swainson's hawks have adapted to foraging primarily in and around agricultural plots (particularly alfalfa, wheat and row crops), as prey is both numerous and conspicuous at harvest and/or during flooding or burning (Bechard et al. 2010).

The nesting range of Swainson's hawk is expanding northward into Napa Valley. In addition, a recent documented nesting occurrence is recorded in large oak tree along the Napa River, approximately four miles south of the Study area (CDFW 2020). The large windbreak trees within and adjacent to the Study area and the large oak trees within the Napa River riparian corridor provide suitable nesting habitat for this species. In addition, the fallow fields and ruderal vegetation within and adjacent to the western portion of the Study area represent suitable foraging habitat. However, no suitable foraging habitat was present within the Project site.

The following species are unlikely to occur but are discussed here further because they are CESA and/or ESA listed or otherwise special-status and documented occurrences exist near the Study area.

California red-legged frog (*Rana draytonii*). Federal Threatened, CDFW Species of Special Concern. The California red-legged frog (CRLF) is dependent on suitable aquatic, estivation, and upland habitat. During periods of wet weather, starting with the first rainfall in late fall, red-legged frogs disperse away from their estivation sites to seek suitable breeding habitat. Aquatic and breeding habitat is characterized by dense, shrubby, riparian vegetation and deep, still or slow-moving water. Breeding occurs between late November and late April. California red-legged frogs estivate (period of inactivity) during the dry months in small mammal burrows, moist leaf litter, incised stream channels, and large cracks in the bottom of dried ponds.

No suitable breeding habitat is present within or adjacent to the Project site. In addition, CRLF predators are likely present within this reach of the Napa River. The Napa River riparian corridor provides elements of suitable non-breeding aquatic habitat; however, no known breeding ponds occur within 1 mile of the Project site. The upland areas within the Study area are heavily managed for agriculture and do not provide suitable upland habitat. In addition, no known breeding habitat is present within 1 mile of the Study area and the developed areas of St. Helena directly north and west of the Study area make it unlikely for this species to disperse through the Study area. In addition, there are no documented occurrences within 7 miles and the nearest records are considered extirpated or possibly extirpated (CDFW 2020).

Foothill yellow-legged frog (*Rana boylii*). State Candidate (Threatened), CDFW Species of Special Concern. The foothill yellow-legged frog (FYLF) historically occurred in coastal and mountain streams from southern Oregon to Los Angeles County, but has declined in many parts of this range. This species is strongly associated with rivers and perennial creeks, and prefers shallow, flowing water with a rocky substrate. FYLF individuals do not typically move overland and are rarely observed far from a source of permanent water (typically less than ten feet). Aquatic breeding sites are in-stream, often near confluences, with eggs typically deposited behind or sometimes under rocks in low-flow areas with cobble and/or gravel (Thomson et al. 2016). Metamorphosis takes at least 15 weeks.

The Napa River adjacent to the Study area provides a rocky substrate and may be occupied when the stream is flowing; any individuals present would presumably retreat downstream when flow ceases. Breeding within the stream is unlikely given the limited water depth and intermittent nature of the flow. There were no observations of this species during the site visit.

Steelhead - Central California Coast DPS (*Oncorhynchus mykiss irideus*). Federal Threatened. The Central California Coast DPS includes all naturally spawned populations of steelhead (and their progeny) in California streams from the Russian River to Aptos Creek, and the drainages of San Francisco and San Pablo Bays eastward to the Napa River (inclusive), excluding the Sacramento-San Joaquin River Basin. Steelhead typically migrate to marine waters after spending two years in freshwater, though they may stay up to seven. They then reside in marine waters for two or three years prior to returning to their natal stream to spawn as four- or five-year olds. Steelhead adults typically spawn between December and June. In California, females typically spawn two times before they die. Preferred spawning habitat for steelhead is in perennial streams with cool to cold water temperatures, high dissolved oxygen levels and fast flowing water. Abundant riffle areas (shallow areas with gravel or cobble substrate) for spawning and deeper pools with sufficient riparian cover for rearing are necessary for successful breeding.

Steelhead are known to occur in this reach of the Napa River (Napa RCD 2006). In addition, the portion of the Napa River near the Study area is within critical habitat for steelhead, as designated by NMFS (NMFS 2020). However, the river was completely dry during the site visit, indicating it is not suitable to support breeding or rearing habitat, which requires perennial or near-perennial flow. In addition, historical imagery suggests this reach of the Napa River has been seasonably dry in several years (e.g., 2013, 2014, 2016, 2019) during the late fall and early winter since at least 1993 (Google 2020). This indicates that this portion of the river does not reliably represent suitable breeding or rearing habitat in any given year. However, when flowing typically in the winter and spring, this stretch of the Napa River does represent important migration habitat for steelhead, connecting spawning habitat in upstream headwaters and marine, potential rearing, and estuarine habitat downstream.

Chinook salmon - Central Valley Fall/late fall-run ESU (Oncorhynchus tshawytscha), NMFS Species of Concern, CDFG Species of Special Concern. The Central Valley Fall/late fall-run ESU includes all naturally spawned spring-run populations from the Sacramento San Joaquin River mainstem and its tributaries. Late-fall run Chinook salmon are morphologically similar to spring-run chinook. They are large salmonids, reaching 75-100 cm SL and weighing up to 9-10 kg or more. The great majority of late-fall Chinook salmon appear to spawn in the mainstem of the Sacramento River, which they enter from October through February. Spawning occurs in January, February and March, although it may extend into April in some years. Eggs are laid in large depressions (redds) hollowed out in gravel beds. The embryos hatch following a 3-4 month incubation period and the alevins (sac-fry) remain in the gravel for another 2-3 weeks. Once their yolk sac is absorbed, the fry emerge and begin feeding on aquatic insects. All fry have emerged by early June. The juveniles hold in the river for nearly a year before moving out to sea the following December through March. Once in the ocean, salmon are largely piscivorous and grow rapidly. The specific habitat requirements of late-fall chinook have not been determined, but they are presumably similar to other Chinook salmon runs and fall within the range of the physical and chemical characteristics of the Sacramento River above Red Bluff.

Chinook salmon are known to occur in this reach of the Napa River (Napa RCD 2006). In addition, the portion of the Napa River near the Study area is within Essential Fish Habitat for this species, as designated by NMFS (NMFS 2020). However, the river was completely dry during the site visit, indicating it is not suitable to support breeding or rearing habitat, which requires perennial or near-perennial flow. In addition, historical imagery suggests this reach of the Napa River has been seasonably dry in several years (e.g., 2013, 2014, 2016, 2019) during the late fall and early winter since at least 1993 (Google 2020). This indicates that this portion of the river does not reliably represent suitable breeding or rearing habitat in any given year. However, when flowing typically in the winter and spring, this stretch of the Napa River could represent important migration habitat for Chinook salmon, potentially connecting spawning habitat in upstream headwaters and marine, potential rearing, and estuarine habitat downstream.

Western pond turtle (*Actinemys marmorata*), CDFW Species of Special Concern. The western pond turtle (WPT) is the only native freshwater turtle in California. This turtle is uncommon to common in suitable aquatic habitat throughout California, west of the Sierra-Cascade crest and Transverse Ranges. WPT inhabits annual and perennial aquatic habitats, such as coastal lagoons, lakes, ponds, marshes, rivers, and streams from sea level to 5,500 feet in elevation. Pond turtles also occupies man-made habitats such as stock ponds, wastewater storage, percolation ponds, canals, and reservoirs. This species requires low-flowing or stagnant freshwater aquatic habitat with suitable basking structures, including rocks, logs, algal mats, mud banks, and sand. Warm, shallow, nutrient-rich waters are ideal as they support prey items, which include aquatic invertebrates and occasionally fish, carrion, and vegetation. Turtles require suitable aquatic habitat for most of the year; however, WPT often occupies creeks, rivers, and coastal lagoons that become seasonally unsuitable. To escape periods of high water flow, high salinity, or prolonged dry conditions, WPT may move upstream and/or take refuge in vegetated, upland habitat for up to four months (Rathbun et al. 2002). Although upland habitat is utilized for refuging and nesting, this species preferentially utilizes aquatic and riparian corridors for movement and dispersal.

WPT nests from late April through July. This species requires open, dry upland habitat with friable soils for nesting and prefer to nest on unshaded slopes within 15 to 330 feet of suitable aquatic habitat (Rathbun et al. 1992). Females venture from water for several hours in the late afternoon or evening during the nesting season to excavate a nest, lay eggs, and bury the eggs to incubate and protect them. Nests are well-concealed, though native mammals are occasionally able to locate and predate upon eggs. Hatchlings generally emerge in late fall but may overwinter in the nest and emerge in early spring of the following year. The Study area does not represent suitable habitat for WPT since the Napa River was completely dry during the site visit and this flow pattern has been recorded in previous years. Although WPT may move through this portion of the Napa River during periods of sustained flow, WPT is not likely to be present for prolonged periods of time, including for breeding, due to the intermittent presence of water. In addition, the upland habitat adjacent to the Napa River within the Study area is highly modified and maintained agricultural land, making it not suitable for WPT breeding.

Critical Habitat, Essential Fish Habitat, and Wildlife Corridors

No designated Critical Habitat (USFWS 2020b) or Essential Fish Habitat (NMFS 2020) occurs in the Project site.

However, this reach of the Napa River directly adjacent to the Study area is critical habitat for steelhead – Central California Coast DPS, as designated by NMFS (NMFS 2020). This reach of the Napa River is also considered Essential Fish Habitat for chinook and coho salmon, which includes large swaths of the Napa River watershed and most tributaries (NMFS 2020). The Napa River is also considered a designated wildlife corridor (Napa County 2005).

IMPACT ANALYSIS

(a) **Less-Than-Significant with Mitigation Incorporated.** The proposed Project would have a significant impact if it would have a substantial adverse effect, either directly or through habitat modifications, on any 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. As discussed in the BSA, no special-status plants have the potential to occur within the Study area. The BSA found that three special-status bats and three special-status birds, as well as non-status birds with baseline legal protections, have the potential to occur in the Project site. In addition, two special-status amphibians, one special-status reptile, and two special-status fishes have a low potential to occur within the Study area vicinity. Mitigation measures and best management practices have been developed and provided herein to avoid impacts to these resources. Implementation of the following mitigation measures would reduce potential impacts to special-status species to a less-than-significant level.

(b) **Less-Than-Significant with Mitigation Incorporated**. Coast live oak riparian woodland may be considered jurisdictional by CDFW pursuant to Section 1602 of the CFGC. The Study area contains 0.25 acre of coast live oak riparian woodland. The Project site currently contains less than 0.01 acre of oak woodland and the Project was intentionally designed to minimize impacts to this sensitive land cover type. The Project will avoid removing mature oak within the coast live oak riparian woodland. However, some trimming may be required. As a result, the following Mitigation Measure is recommended to protect coast live oak riparian woodlands.

> Mitigation Measure BIO-1: The Project shall avoid impacting mature coast live oak trees to the maximum extent feasible. In addition, prior to Project initiation, the City obtain a Lake and Streambed Alteration Agreement from CDFW to authorize construction activities within coast live oak riparian woodland habitat.

The Project site supports riparian habitat that may be regulated by CDFW. The Napa River, which is regulated as a waters of the U.S. and State, is situated outside of the Project site. However, the Napa River flows adjacent to the eastern Project site boundary and may be indirectly impacted during construction through accidental release of harmful chemicals or impaired runoff. The following measures are recommended to ensure Project compliance with all applicable federal and state regulations.

> Mitigation Measure BIO-2:
> The City will be required to secure regulatory permits to authorize impacts to Waters of the State prior to construction of the stormwater outfall structure and to comply with all permit conditions. In addition, regulatory agencies may require compensatory mitigation for impacts to jurisdictional habitat features in order to comply with the state "no net loss of wetlands" policy. Impacts to jurisdictional features should not occur until the permits are received from the appropriate regulatory agencies, or correspondence is received from the agencies indicating that a permit is not required. The following requirements are anticipated:
>
> - Apply for a Lake and Streambed Alteration Agreement (LSAA) to authorize outfall work proposed to occur along the bank of Napa River in accordance with Section 1600 of the CFGC. The City will be responsible for conducting all project activities in accordance with the LSAA.
> - Submit to RWQCB an application for Waste Discharge Requirements for Projects Involving Discharge of Dredged and/or Fill Material to Waters of the State. The City

will be responsible for conducting all project activities in accordance with the permit provisions outlined in the applicable RWQCB permit.

In addition, the following aquatic resource impact avoidance and minimization measures would be implemented as part of the Project:

- Removal of vegetation will be minimized to the extent feasible during outfall installation work. Construction areas temporarily disturbed by excavation and construction activities will be restored immediately to pre-project conditions at minimum. The stream bank surrounding the work area will be stabilized through the installation of a rip-rap and revegetating disturbed areas with appropriate erosion control vegetation.
- Construction activities associated with the storm drain outfall installation and associated BMP activities, which will be performed in order to stabilize the slope surrounding the work area along the bank of Napa River, shall be conducted during the dry season, typically between April 1 and October 15 and should be suspended during unseasonable rainfalls of greater than one-half inch over a 24-hour period. If rainfall is in the forecast, standard erosion control measures (e.g., straw waddles, bales) should be deployed on the Project site edge paralleling the aquatic feature. This work window may be adjusted based on weather patterns at the time of construction (e.g., late season precipitation could postpone the start date).
- Prior to construction activities, the boundaries of the Napa River including its secondary channel will be plotted on all construction plans and maps, including a minimum buffer of 10 feet or more as determined by a qualified biologist.
- Silt fencing and construction fencing (or flagging to make the silt fencing more visible) shall be installed above the OHWM of the Napa River, and the final location of the installed fencing shall be approved by a qualified biologist prior to initiation of construction activities.
- Encroachment into the sensitive habitat and buffer shall be prohibited by construction personnel, and storage of materials or equipment shall be prohibited in this area.
- Prior to the onset of construction activities, construction personnel shall be briefed on the location of sensitive habitat and other resources that shall be preserved and the importance of avoidance.
- The fencing shall be monitored regularly during construction activities to ensure that the fencing remains intact and functional, and that encroachment has not occurred into the sensitive habitat or boundary; any repairs to the fence or encroachment correction shall be conducted immediately.
- All fueling and maintenance of vehicles and other equipment and staging areas shall be at least 50 feet (15 meters) from sensitive habitats.
- Appropriate sediment and erosion control best management practices (BMPs) (e.g., use of silt fencing and/or straw waddles around the perimeter of the construction zone) shall be implemented to minimize surface runoff originating from the development and thereby protect water quality of Napa River and its associated habitats. The BMPs shall be implemented during and following project construction, as described in the project's stormwater pollution prevention plan (SWPPP).
- To avoid establishment of invasive, non-native plant species on or adjacent to the project site, the following measures shall be implemented:

- Vegetation disturbances shall be limited to those areas identified on construction plans and maps as slated for development or construction staging.
- Native and compatible non-native plant species shall be used for revegetation. The list of plant species included in the seed mix will be pre-approved by CDFW prior to revegetation implementation.
- The revegetation seed mix will not include invasive non-native plants that threaten wildlands according to the California Invasive Plant Inventory made available by the California Invasive Plant Council (Cal-IPC).
- Erosion and sediment control materials shall be certified as weed-free.

(c) **Less-Than-Significant Impact.** Aquatic resources include Waters of the U.S., Waters of the State, and streams, lakes, and riparian habitat as defined in the CWA, Porter-Cologne Act, and CFGC, respectively. The City of St. Helena mandates setbacks for some structures (with size exceptions) from the top-of-bank of streams, and therefore requires mapping of the outward extent of such features. The BSA notes that the Napa River is mapped in the National Wetlands Inventory and the California Aquatic Resources Inventory.

A formal wetland delineation was conducted concurrent to the biological resources site assessment to evaluate indicators of wetlands such as hydrophytic vegetation (i.e., plant communities dominated by wetland species), evidence of inundation or flowing water, saturated soils and seepage, and topographic depressions/swales. WRA followed *the Corps of Engineers Wetlands Delineation Manual (Environmental Laboratory 1987)* and the *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region (Corps 2008).*

Streams potentially regulated under the CWA and/or the CFGC were delineated using a combination of surveyed topography data, high resolution aerial photographs, and a sub-meter GPS unit. The location of the ordinary high water mark was recorded to determine the extent of potential CWA Section 404/401 jurisdiction. The top-of-bank was delineated to identify the extent of streambeds regulated by CDFW under CFGC Section 1602. Streams with associated woody vegetation were assessed to determine if these areas would be considered riparian habitat by the CDFW following *A Field Guide to Lake and Streambed Alteration Agreements, Section 1600-1607, California Fish and Game Code (CDFG 1994).*

The Project will not result in the direct removal, filling, or hydrological interruption of wetlands, drainages, or other state or federally protected wetlands. No Project work will occur below the top of bank of the Napa River. Therefore, no potentially significant impacts to state or federally protected wetlands would result from the proposed Project. Impacts would be less than significant.

(d) **Less-Than-Significant Impact.** As stated in Section 5.2. of the BSA (Appendix C), the Study area predominantly consists of a paved road surrounded by agricultural land and rural residences. Construction of the storm water outfall will occur within a small portion of the upper stream bank and is not expected to impede wildlife movement within the Napa River corridor. The surrounding oak woodland and riverine habitat will allow for continued localized movement of wildlife. Native resident or migratory fish or wildlife species, established native resident or migratory wildlife corridors, and native wildlife nursery sites would not be significantly affected by the proposed Project. Impacts would be less than significant.

(e) **Less-Than-Significant with Mitigation Incorporated**. The Project proposes removal of two trees: tree 2922 (city tree) located right at the beginning of Mills Lane, and tree 2905 (willow/riparian tree) located at the Project's outfall location. All trees located in the City right-of-way are covered

by Section 17.10 of the St. Helena Municipal Code. Project's that consist of pruning, root pruning, removal or replacement of any trees in the City right-of-way, require a tree permit/contract and encroachment permit/contract. Project impacts to trees could be mitigated to a level considered less than significant pursuant to CEQA with implementation of Mitigation Measures BIO-3, BIO-4, and BIO-5 listed below.

(f) **Less-Than-Significant Impact.** The Project will not conflict with the provisions of an adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, impacts to the function of a Habitat Plan would be less than significant.

MITIGATION MEASURES

Mitigation Measure BIO-1: The Project should avoid impacting mature coast live oak trees to the maximum extent feasible. In addition, prior to project initiation, it is recommended that the City obtain a Lake and Streambed Alteration Agreement from CDFW to authorize construction activities within coast live oak riparian woodland habitat.

Mitigation Measure BIO-2:
The City will be required to secure regulatory permits to authorize impacts to Waters of the State prior to construction of the stormwater outfall structure and to comply with all permit conditions. In addition, regulatory agencies may require compensatory mitigation for impacts to jurisdictional habitat features in order to comply with the state "no net loss of wetlands" policy. Impacts to jurisdictional features should not occur until the permits are received from the appropriate regulatory agencies, or correspondence is received from the agencies indicating that a permit is not required. The following requirements are anticipated:

- Apply for a Lake and Streambed Alteration Agreement (LSAA) to authorize outfall work proposed to occur along the bank of Napa River in accordance with Section 1600 of the CFGC. The City will be responsible for conducting all project activities in accordance with the LSAA.
- Submit to RWQCB an application for Waste Discharge Requirements for Projects Involving Discharge of Dredged and/or Fill Material to Waters of the State. The City will be responsible for conducting all project activities in accordance with the permit provisions outlined in the applicable RWQCB permit.

In addition, the following aquatic resource impact avoidance and minimization measures would be implemented as part of the Project:

- Removal of vegetation will be minimized to the extent feasible during outfall installation work. Construction areas temporarily disturbed by excavation and construction activities will be restored immediately to pre-project conditions at minimum. The stream bank surrounding the work area will be stabilized through the installation of a rip-rap and revegetating disturbed areas with appropriate erosion control vegetation.
- Construction activities associated with the storm drain outfall installation and associated BMP activities, which will be performed in order to stabilize the slope surrounding the work area along the bank of Napa River, shall be conducted during the dry season, typically between April 1 and October 15 and should be suspended during unseasonable rainfalls of greater than one-half inch over a 24-hour period. If rainfall is in the forecast, standard erosion control measures (e.g., straw waddles, bales) should be deployed on the Project site edge paralleling the aquatic feature. This work window may be adjusted based on weather patterns at the time of construction (e.g., late season precipitation could postpone the start date).
- Prior to construction activities, the boundaries of the Napa River including its secondary channel will be plotted on all construction plans and maps, including a minimum buffer of 10 feet or more as determined by a qualified biologist.
- Silt fencing and construction fencing (or flagging to make the silt fencing more visible) shall be installed above the OHWM of the Napa River, and the final location of the installed fencing shall be approved by a qualified biologist prior to initiation of construction activities.

- Encroachment into the sensitive habitat and buffer shall be prohibited by construction personnel, and storage of materials or equipment shall be prohibited in this area.
- Prior to the onset of construction activities, construction personnel shall be briefed on the location of sensitive habitat and other resources that shall be preserved and the importance of avoidance.
- The fencing shall be monitored regularly during construction activities to ensure that the fencing remains intact and functional, and that encroachment has not occurred into the sensitive habitat or boundary; any repairs to the fence or encroachment correction shall be conducted immediately.
- All fueling and maintenance of vehicles and other equipment and staging areas shall be at least 50 feet (15 meters) from sensitive habitats.
- Appropriate sediment and erosion control best management practices (BMPs) (e.g., use of silt fencing and/or straw waddles around the perimeter of the construction zone) shall be implemented to minimize surface runoff originating from the development and thereby protect water quality of Napa River and its associated habitats. The BMPs shall be implemented during and following project construction, as described in the project's stormwater pollution prevention plan (SWPPP).
- To avoid establishment of invasive, non-native plant species on or adjacent to the project site, the following measures shall be implemented:
    - Vegetation disturbances shall be limited to those areas identified on construction plans and maps as slated for development or construction staging.
    - Native and compatible non-native plant species shall be used for revegetation. The list of plant species included in the seed mix will be pre-approved by CDFW prior to revegetation implementation.
    - The revegetation seed mix will not include invasive non-native plants that threaten wildlands according to the California Invasive Plant Inventory made available by the California Invasive Plant Council (Cal-IPC).
    - Erosion and sediment control materials shall be certified as weed-free.

Mitigation Measure BIO-3: Tree removal shall be performed from September through March, outside of the general bat maternity season. If tree removal during this period is not feasible, a bat habitat assessment and survey effort be performed by a qualified biologist prior to tree removal to determine if bats are present in the trees. If no suitable roosting habitat for bats is found, then no further study is warranted. If special-status bat species or bat maternity roosts are detected, then roost trees shall be avoided until the end of the maternity roosting season. If this avoidance is not feasible, appropriate species- and roost-specific mitigation measures shall be developed in consultation with CDFW. Irrespective of time of year, all felled trees shall remain on the ground for at least 24 hours prior to chipping, off-site removal, or other processing to allow any bats present within the felled trees to escape.

Mitigation Measure BIO-4: Tree/vegetation removal and initial ground disturbance shall occur from August 16 to January 31, outside of the general bird nesting season. If tree/vegetation removal during this time is not feasible, a pre-construction nesting bird survey shall be performed by a qualified biologist no more than 14 days prior to the initiation of tree removal or ground disturbance is recommended. The survey shall cover the Project site (including tree removal areas) and surrounding areas within 500 feet where access is feasible. If active bird nests are found during the survey, an appropriate no-disturbance buffer shall be established by the qualified biologist. Once it is determined that the young have fledged (left the nest) or the nest otherwise becomes inactive (e.g., due to predation), the buffer may be lifted and work may be initiated within the buffer.

Mitigation Measure BIO-5: If tree removal occurs during the Swainson's hawk nesting season (between March 1 to September 15), a minimum of two pre-construction Swainson's hawk nest surveys shall be performed. Nest surveys shall be conducted within a 0.25-mile radius of the Study area (where accessible) and fall within Survey Periods II and III and be conducted with methodology outlined in the *Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley* (CDFG 2000). If a nest is located during pre-construction surveys, the qualified biologist shall establish an appropriate no-disturbance buffer. Once it is determined that the young have fledged (left the nest) or the nest otherwise becomes inactive (e.g., due to predation), the buffer may be lifted

and work may be initiated within the buffer.

Mitigation Measure BIO-6: Outfall construction work would be conducted during the dry season when the adjacent stretch of the Napa River is completely dry. In addition, two preconstruction surveys shall be performed by a qualified biologist within the Project site and a surrounding 100-foot buffer from the limit of disturbance no more than 5 days prior to project initiation. The surveys must have remarkably different light angles (e.g., early morning and early afternoon), but can be conducted on the same day. Survey areas (streams) will be systematically walked upstream, zig-zagging between the bank and the thalweg in wide areas, and bank-to-bank in narrow areas. All areas along the streams that could support frogs or WPT will be searched, including rocks, ledges, woody debris, overhanging vegetation, and exposed logs. Surveyors will use binoculars to reduce disturbing frogs and flashlights for searching darkened crevices and shaded areas. Slow-moving and/or still waters will be closely inspected for the presence of tadpoles.

If no CRLF, FYLF, or WPT are detected during the pre-construction survey, additional impact avoidance measures would be warranted. Such measures include: (1) installation of exclusion fencing, (2) presence of qualified biologist[10] during ground disturbance activities, and (3) implementation of a worker education program. Exclusion fencing shall be installed along the inhabited aquatic feature immediately adjacent to the Project site, extending 100 feet beyond the terminus of the proposed ground disturbance in each direction. The qualified biologist will be present to perform a survey of the Project site in the morning prior to that day's ground-breaking activities. If a CRLF, FYLF, or WPT is present within the Project site, individual frogs or WPT shall be allowed to leave the disturbance area of their own accord, as confirmed by the biologist. Alternatively, other measures may be derived and approved in coordination with the CDFW. Finally, the worker education program shall consist of a qualified biologist providing construction personnel with information regarding the identification and ecology of CRLF, FYLF and WPT, the potential for occurrence of the species within work areas, the legal status of the species and ramifications for take, the specific measures being implemented to avoid impacts to CRLF, FYLF, and WPT, and the role of the qualified biologist.

IMPACT SIGNIFICANCE AFTER MITIGATION

Implementation of the mitigation measure listed above will ensure all impacts to biological resources are reduced to a less than significant level.

SOURCES

- Biological Site Assessment Report (BSA), WRA, Inc. May 2021
- City of St. Helena General Plan Update 2040; Adopted May 14, 2019.

[10] A qualified biologist is an individual who possesses, at a minimum, a bachelor's or advanced degree, from an accredited university, with a major in biology, zoology, wildlife biology, natural resources science, or a closely related scientific discipline, at least two years of field experience in the biology and natural history of local plant, fish, and wildlife resources in the Project site vicinity, and knowledge of state and federal laws regarding the protection of sensitive and endangered species.

CULTURAL RESOURCES	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☒	☐	☐

This section examines the potential impacts of the proposed Project on cultural resources based upon an Archaeological Survey Report (ASR) prepared by Alta Archaeological Consultants (ALTA) in March 2021. The report contains sensitive cultural and tribal cultural resources information and is available for review upon request to qualified individuals only. The ASR includes information from a cultural resource inventory that was conducted by ALTA to satisfy the requirements of CEQA, as codified in Public Resource Code sections 5097, and its implementing guidelines 21082 and 21083.2. ALTA field staff conducted a cultural resources field investigation of the Project area on December 10, 2020. One cultural resource was identified within the Project area as a result of the literature review, Native American communication, or archaeological field survey.

The cultural resource survey resulted in the identification of a previously undocumented prehistoric lithic scatter as present within the Project area. The study included an assessment of the Project area to contain buried archaeological resources that determined the Project area to be highly likely to contain buried archaeological resources. Given the positive survey findings and the high probability of the Project to encounter buried archaeological resources a program of subsurface archaeological trenching was conducted. A backhoe was used to excavate a series of trenches along the proposed pipeline route. Following the archaeological trenching, ALTA prepared a Report of Subsurface Exploratory Archaeological Trenching (letter report) on June 25, 2021 that documents the results of subsurface archaeological exploration within the Project area and provides management recommendations to ensure that cultural resources are not adversely affected by the proposed Project.

ENVIRONMENTAL SETTING

The Project site is situated within the Coast Range geologic province. The northern Coast Ranges are a geologic province comprised of numerous rugged north-south trending ridges and valleys that run parallel to a series of faults and folds. Formation of these ranges is generally attributed to events associated with subduction of the Pacific Plate beneath the western border of North America. The bedrock that underlies the region is a complex assemblage of highly deformed, fractured, and weathered sedimentary, igneous, and metamorphic rocks. The western side of the Napa Valley is the Mayacamas Mountains, which are made up largely of marine sedimentary rocks of the Franciscan and Great Valley complexes (100 to 150 million years old). Rocks of this formation, the oldest in the area, are often weakly metamorphosed, and consist of greywacke shale interspersed with discontinuous bodies of ultramafic rock

such as greenstone, schist, and serpentine. The repeated folding and faulting is reflected in the complex structure of Franciscan rocks and area topography (Schoenherr 1995:265). The eastern side is the Vaca Mountains, which consists mostly of much younger lavas of the Sonoma Volcanics (less than 5 m.y.) and includes formations of obsidian. The Napa obsidian is a stone of a luscious pure black that was used extensively by local Native American tribes. The obsidian source is visible in a large roadcut on the Silverado Trail, less than one-half mile east of the Project site.

A Mediterranean climate prevails within the Project site with an average of 25 inches of rainfall annually. Winters are cool and wet, while summers are hot and dry. Annual temperatures range from about 30 to 95 degrees Fahrenheit. The area is considered mostly prime farmland, but historically, prior to the conversion of much of the valley to agriculture and viticulture, the Napa Valley was largely comprised of Valley Oak savanna, interspersed with fresh water marsh (Grossinger 2012) that supported abundant resources for Native American settlement. The Valley Oak savanna landscape is largely defined by true oak species such as the Valley Oak (Quercus lobata), the Blue Oak (Quercus douglasii) and the Coast Live Oak (Quercus agrifolia) (Schoenherr 1995:273).

The Project is located in central Napa County to the east of downtown St. Helena within the heart of Napa Valley. The closest perennial stream is the Napa River, about half-mile to the east of the originating point of the proposed alignment; Sulphur Creek, a tributary drainage, traverses the Valley floor and empties into the Napa River about a quarter-mile north of the project alignment.

The ASR includes findings from the archaeological field survey that was completed by ALTA on December 10, 2020 for the purpose of identifying cultural resources within the proposed actions within the Project site. For the purposes of the cultural resources field investigation, the entire Project site was surveyed, totaling approximately 2.8-acres. According to the ASR, one prehistoric archaeological site was identified. The cultural resources survey report (ASR) documents the adequacy of identification efforts, presents the results of investigations within the Study area boundaries, and makes recommendations for management of resources present within the Project site. This investigation report (ASR) addresses the responsibilities of California Environmental Quality Act (CEQA), as codified in Public Resources Code sections 5097, and its implementing guidelines 21082 and 21083.2.

Records Search

At ALTA's request, a records search was prepared by Annette Neal, Researcher at the Northwest Information Center (NWIC), located on the campus of Sonoma State University. The NWIC, an affiliate of the State of California Office of Historic Preservation is the official state repository of archaeological and historical records and reports for an 18-county area that includes Napa County. The records search request included a review of all study reports on file within a one-half mile radius of the Project site. A search of cultural resources included a one-half mile radius. Sources consulted include archaeological site and survey base maps, survey reports, site records, and historic General Land Office (GLO) maps. The results were provided to ALTA by ACE Environmental, who serves as the prime consultant for the proposed undertaking.

Included in the review were:

- *California Inventory of Historical Resources* (California Dept. of Parks and Recreation 1976)
- *California Historical Landmarks* for Napa County (CA-OHP 1990)
- *California Points of Historical Interest* (CA-OHP 1992)
- *Built Environment Resource Directory* (CA-OHP January 2020), including the National Register of Historic Places, California Historical Landmarks, and California Points of Historical Interest

Review of historic registers and inventories indicate that no historical landmarks or points of interest are present in the Project site. A number of National Register listed or eligible properties are located within the 0.5-mile visual area of the Project site, including the Saint Helena Historical Commercial District and the Pope Street Bridge.

Review of archaeological site and survey maps revealed that twenty cultural resource studies have been previously performed within a one-half mile radius of the Project site. The studies performed within the search radius represent approximately 25% level of previous survey for the 0.5-mile records search radius. Six studies intersect with the Project site (some studies have multiple documents). According to the NWIC, two resources intersect with the Project site, the Southern Pacific Railroad and Napa Valley Railroad District; Napa Wine Train, while 22 have been previously identified within the search radius. While the resources identified by the NWIC appear to intersect with

the Project site alignment, these resources are not physically within the area of direct impact associated with the proposed Project.

REGULATORY SETTING

California Environmental Quality Act

The CEQA applies to certain projects requiring approval by State and/or local agencies. Property owners, planners, developers, as well as State and local agencies, are responsible for complying with CEQA's requirements regarding the identification and treatment of historical resources. Applicable California regulations are found in California PRC Sections 5020 through 5029.5 and Section 21177, and in CEQA (CCR Sections 15000 through 15387). CEQA equates a substantial adverse change in the significance of a historical resource with a significant effect on the environment (PRC Section 21084.1). A substantial adverse change includes demolition, destruction, relocation, or alteration that would impair the historical significance of a resource (PRC Section 5020.1). PRC Section 21084.1 stipulates that any resource listed in, or eligible for listing in, the California Register of Historical Resource (CRHR) is presumed to be historically or culturally significant. If a resource is determined ineligible for listing on the CRHR, the resource is released from management responsibilities and a project can proceed without further cultural resource considerations.

Under CEQA, cultural resources that will be affected by an undertaking must be evaluated to determine their eligibility for listing in the CRHR (PRC Section 5024.1(c)). For a cultural resource to be deemed eligible for listing, it must meet at least one of the following criteria:

- is associated with events that have made a significant contribution to the broad patterns of California History and cultural heritage; or
- is associated with the lives of persons important to our past; or
- embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possess high artistic value; or
- has yielded or is likely to yield, information important to prehistory or history.

The eligibility of archaeological sites is usually evaluated under Criterion 4 –its potential to yield information important to prehistory or history. Whether or not a site is considered important is determined by the capacity of the site to address pertinent local and regional research themes. The process for considering cultural resources on CEQA projects is essentially linear, although in practice it may overlap or be compressed. Evaluating prehistoric properties involves four basic tasks: (1) development of an archaeological research design (2) field excavations, (3) laboratory analysis, and (4) report preparation and eligibility determination.

Guidelines for the implementation of CEQA define procedures, types of activities, persons, and public agencies required to comply with CEQA. Section 15064.5(b) prescribes that project effects that would "cause a substantial adverse change in the significance of an historical resource" are significant effects on the environment. Substantial adverse changes include both physical changes to the historical resource, or to its immediate surroundings.

Section 21083.2 of the CEQA guidelines also defines "unique archaeological resources" as "any archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- Contains information needed to answer important scientific research questions and show that there is a demonstrable public interest in that information.
- Has a special and particular quality, such as being the oldest of its type or the best available example of its type.
- Is directly associated with a scientifically recognized important prehistoric or historic event or person."

This definition is equally applicable to recognizing "a unique paleontological resource or site." CEQA Section 15064.5 (a)(3)(D), which indicates "generally, a resource shall be considered historically significant if it has yielded, or may be likely to yield, information important in prehistory or history," provides additional guidance.

Historical Resources

CEQA Guidelines recognize that a historical resource includes: 1) a resource in the California Register of Historical Resources; 2) a resource included in a local register of historical resources, as defined in PRC § 5020.1(k) or identified as significant in a historical resource survey meeting the requirements of PRC § 5024.1(g); and 3) any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California by the lead agency, provided the lead agency's determination is supported by substantial evidence in light of the whole record.

If a lead agency determines that an archaeological site is a historical resource, the provisions of PRC § 21084.1 and PRC § 15064.5 apply. If an archaeological site does not meet the criteria for a historical resource contained in the CEQA Guidelines (codified at California Code of Regulations § 15000 *et seq.*), then the site may be treated in accordance with the provisions of PRC § 21083, pertaining to unique archaeological resources.

Unique Archaeological Resources

As defined in PRC § 21083.2 a "unique archaeological resource" is an archaeological artifact, object, or site, about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information;

Has a special and particular quality such as being the oldest of its type or the best available example of its type; or,

Is directly associated with a scientifically recognized important prehistoric or historic event or person.

CEQA Guidelines note that if an archaeological resource is not a unique archaeological, historical resource, or tribal cultural resource, the effects of the project on those cultural resources shall not be considered a significant effect on the environment (CEQA Guidelines § 15064.5[c][4]).

<u>California Register of Historical Resources</u>

The California Register is "an authoritative listing and guide to be used by State and local agencies, private groups, and citizens in identifying the existing historical resources of the State and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change" (PRC § 5024.1[a]). The criteria for eligibility for the California Register are based upon the criteria for listing on the National Register of Historic Places (National Register) (PRC § 5024.1[b]). Certain resources are determined by the statute to be automatically included in the California Register, including California properties formally determined eligible for, or listed in, the National Register.

To be eligible for the California Register, a cultural resource must be significant at the local, State, and/or federal level under one or more of the following four criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. Is associated with the lives of persons important in our past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. Has yielded, or may be likely to yield, information important in prehistory or history.

A resource eligible for the California Register must be of sufficient age, and retain enough of its historic character or appearance (integrity) to convey the reason for its significance. Additionally, the California Register consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The California Register automatically includes the following:

- California properties listed on the National Register and those formally Determined Eligible for the National Register;
- California Registered Historical Landmarks from No. 770 onward; and

- Those California Points of Historical Interest that have been evaluated by the OHP and have been recommended to the State Historical Commission for inclusion on the California Register.

Other resources that may be nominated to the California Register include:

- Historical resources with a significance rating of Category 3 through 5 (those properties identified as eligible for listing in the National Register, the California Register, and/or a local jurisdiction register);
- Individual historic resources;
- Historic resources contributing to historic districts; and
- Historic resources designated or listed as local landmarks, or designated under any local ordinance, such as an historic preservation overlay zone.

California Public Resources Code § 5097

PRC § 5097.99, as amended, states that no person shall obtain or possess any Native American artifacts or human remains that are taken from a Native American grave or cairn. Any person who knowingly or willfully obtains or possesses any Native American artifacts or human remains is guilty of a felony, which is punishable by imprisonment. Any person who removes, without authority of law, any such items with an intent to sell or dissect or with malice or wantonness is also guilty of a felony which is punishable by imprisonment.

California Native American Historic Resource Protection Act

The California Native American Historic Resources Protection Act of 2002 imposes civil penalties, including imprisonment and fines up to $50,000 per violation, for persons who unlawfully and maliciously excavates upon, removes, destroys, injures, or defaces a Native American historic, cultural, or sacred site that is listed or may be listed in the California Register.

California Health and Safety Code § 7050.5

Section 7050.5 of the California Health and Safety Code (HSC) protects human remains by prohibiting the disinterring, disturbing, or removing of human remains from any location other than a dedicated cemetery. PRC § 5097.98 (and reiterated in PRC § 15064.59[e]) also identifies steps to follow in the event of the accidental discovery or recognition of any human remains in any location other than a dedicated cemetery.

St. Helena General Plan Update 2040

The General Plan Update 2040 contains the following policies related to cultural resources:

HR1.5 For development and redevelopment proposals in archaeologically and paleontologically sensitive areas of St. Helena or where tribal cultural resources are known to exist, require an assessment of the potential presence of archaeological, paleontological and tribal cultural resources, including a site survey and a records search of the California Historical Resources Information System at the Northwest Information Center (NWIC). As warranted by the results of the assessment, require additional studies to identify and address project-specific impacts on archaeological and paleontological resources. The City shall incorporate the study recommendations as project conditions of approval to ensure that impacts on archaeological and/or paleontological resources are mitigated to the extent possible. Studies shall be prepared according to National Register Bulletin 24: Guidelines for Local Surveys: A Basis for Preservation Planning and the Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation.

HR2.1 Strengthen public awareness of and support for the preservation and protection of the City's historic resources, while improving community access to information about local Native American history.

HR2.2 In cooperation with Native American Research and Historical Preservation Society, improve community access to information about Native American life.

IMPACT ANALYSIS

(a, b) **Less Than Significant With Mitigation Incorporation.** The Native American Heritage Commission has been contacted and no responses have been received.

According to the ASR, the Project may cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5. The ASR included an assessment of the Project area to contain buried archaeological resources that determined the Project area to be highly likely to contain buried archaeological resources. Given the positive survey findings and the high probability of the Project to encounter buried archaeological resources, a program of subsurface archaeological trenching was conducted. Excavation of backhoe trenches revealed that the Project area is characterized by highly disturbed soils in near surface contexts and intact sediments are present at an average depth of 24" depth below surface. A buried archaeological resource was identified in one trench. Given the positive cultural resource findings and the proximity of the proposed Project to several archaeological sites, in addition to the high probability of the Project to encounter additional buried soils that may harbor archaeological resources, Mitigation Measures CULT-1 through CULT-5 listed below are provided to avoid any deleterious effects to a potential historical or archaeological resource per CEQA regulations, as well as any unknown resource not yet identified. The Project should be allowed to proceed given the implementation of the following Mitigation Measures CULT-1 through CULT-5 listed below which would reduce impacts to less than significant levels.

(c) **Less Than Significant With Mitigation Incorporation.** No known human remains have been identified in the Project site or its vicinity. Also, the land use designations for the project site do not include cemetery uses. Therefore, the proposed Project is not anticipated to disturb any human remains. However, because the proposed Project would involve some ground-disturbing activities, construction activities may unearth, expose, or disturb previously unknown human remains. If human remains were discovered during proposed Project construction activities, impacts on the human remains resulting from the proposed Project would be significant if those remains were disturbed or damaged. Such potentially significant impacts would be reduced to a less-than-significant with implementation of Mitigation Measure CULT-2 and Mitigation Measure CULT-5 listed below.

MITIGATION MEASURES

Mitigation Measure CULT-1: Conduct Archaeological Monitoring During Construction

A qualified professional archaeologist meeting the Professional Qualifications Standards defined in the Secretary of the Interior's Standards and Guidelines (36 CFR 61) shall conduct on-site monitoring during any ground disturbing activities within the project area, and will inspect all excavation spoils, and visible trench profiles for the presence of intact archaeological remains or deposits. Samples of excavated soil will be passed through archaeological screens and examined for the presence of artifacts and archaeological remains. The responsibility of the archaeological monitor includes inspecting, documenting, and describing any cultural materials identified during construction. Archaeological monitors are responsible for communicating with construction personnel if potentially significant cultural resources are identified. Archaeological monitors shall temporarily halt construction activities if it is likely that those activities have the potential to disturb significant or potentially significant archaeological remains. If cultural resources are identified, the monitor, in consultation with the Native American monitor (if present), shall follow the process outlined below for treatment.

Mitigation Measure CULT-2: Unanticipated Discovery of Cultural Resources

If previously unidentified cultural resources are encountered during Project implementation, avoid altering the materials and their stratigraphic context. A qualified professional archaeologist shall be contacted to evaluate the situation. Project personnel shall not collect cultural resources. Prehistoric resources include, but are not limited to, chert or obsidian flakes, projectile points, mortars, pestles, and dark friable soil containing shell and bone dietary debris, heat-affected rock, or human burials. Historic resources include stone or abode foundations or walls;

structures and remains with square nails; and refuse deposits or bottle dumps, often located in old wells or privies

Mitigation Measure CULT-3: Cultural Resource Evaluation

The potential significance of the Project sites is directly tied to the ability of each cultural resource to address local and regional research questions. Surface testing and controlled subsurface excavation will be used to define the areal extent and depth of the cultural deposit(s), the types, kinds, and quantity of artifactual materials present, the chronological age of the resource(s), identify any single component areas, address overall site integrity, determine the eligibility of the site(s), and assess the impacts to the resource(s) by the Project. Testing will indicate whether the Project site(s) are significant and potentially eligible for inclusion on the CRHR.

Mitigation Measure CULT-4: Mitigation of Adverse Effects

If archaeological resources are present that are determined to qualify as a historical resource or unique archaeological resource and cannot be avoided, then the adverse effects to the resource will be mitigated through an archaeological data recovery program (ADRP). The scope of the ADRP shall be consistent with the recommendations for data recovery programs outlined in the San Francisco-Bay Delta Regional Context and Research Design for Native American Archaeological Resources (Byrd et al. 2017). The archaeologist will prepare a draft ADRP, which will identify the scientific/historical research questions that are applicable to the expected resource, the data classes the resource is expected to possess, and how the expected data classes will address the applicable research questions. Data recovery, in general, shall be limited to the portions of the historical resource that could be adversely affected by the proposed project. Destructive data recovery methods will not be applied to portions of the archaeological resources if nondestructive methods are practical.

Mitigation Measure CULT-5: Encountering Native American Remains

Although unlikely, if human remains are encountered, all work must stop in the immediate vicinity of the discovered remains and the County Coroner and a qualified archaeologist must be notified immediately so that an evaluation can be performed. If the remains are deemed to be Native American and prehistoric, the Native American Heritage Commission must be contacted by the Coroner so that a "Most Likely Descendant" can be designated and further recommendations regarding treatment of the remains is provided.

IMPACT SIGNIFICANCE AFTER MITIGATION

Implementation of the Mitigation Measures listed above will ensure all impacts to cultural resources are reduced to a less than significant level.

SOURCES

- City of St. Helena General Plan Update 2040; Adopted May 14, 2019.
- Archaeological Survey Report (ASR), Alta Archaeological Consultants (ALTA), March 2021.
- Report of Subsurface Exploratory Archaeological Trenching (letter report), ALTA, June 2021.

ENERGY	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

ENVIRONMENTAL SETTING

In 2002, the Legislature passed Senate Bill 1389, which required the California Energy Commission (CEC) to develop an integrated energy plan every two years for electricity, natural gas, and transportation fuels, for the California Energy Policy Report. The plan calls for the State to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies a number of strategies, including assistance to public agencies and fleet operators in implementing incentive programs for zero emission (ZE) vehicles and their infrastructure needs, and encouragement of urban designs that reduce VMT and accommodate pedestrian and bicycle access.

Energy resources include electricity, natural gas, and other fuels. In 2019, California was the nation's top producer of electricity from solar, geothermal, and biomass energy, and the state was second in the nation in conventional hydroelectric power generation.[11] The production of electricity requires the consumption or conversion of energy resources, including water, wind, oil, gas, coal, solar, geothermal, and nuclear resources, into energy. Energy production and energy use both result in the depletion of nonrenewable resources (e.g., oil, natural gas, coal, etc.) and emission of pollutants. Energy capacity, or electrical power, is generally measured in watts while energy use is measured in watt-hours. For example, if a light bulb has a capacity rating of 100 watts, the energy required to keep the bulb on for 1 hour would be 100 watt-hours (Wh). In 2019, the CEC reported that Napa County consumed approximately 1,042.999221 gigawatt-hours (GWh) of electricity, (1 GWh = 1,000,000,000.72 Wh).[12]

Pacific Gas and Electric Company (PG&E) is the primary energy utility provider in Napa County, furnishing both natural gas and electricity for residential, commercial, industrial, and municipal uses. PG&E generates or buys electricity from hydroelectric, nuclear, renewable, natural gas, and coal facilities. In 2019, renewable energy facilities including solar, wind, geothermal, and biomass provided 29 percent of PG&E's electricity delivered to customers; nuclear plants provided 44 percent; hydroelectric operations provided 27 percent.[13] Given the nature of the proposed Project, the main uses of energy would occur via construction vehicle fuel.

[11] US Energy Information Administration. State Profile and Energy Estimates. California. 2018. Available at: https://www.eia.gov/state/?sid=CA#tabs-1 Accessed on March 16, 2021

[12] California Energy Commission, 2019. Energy Consumption Data Management Service. Electricity Consumption by County. Available at:< www.ecdms.energy.ca.gov/elecbycounty.aspx > Accessed on March 16,2021.

[13] PG&E. "Exploring Clean Energy Solutions." Available at: https://www.pge.com/en_US/about-pge/environment/what-we-are-doing/clean-energy-solutions/clean-energy-solutions.page?WT.mc_id=Vanity_cleanenergy Accessed on March 16, 2021.

REGULATORY SETTING

In 2002, the Legislature passed Senate Bill 1389, which required the California Energy Commission (CEC) to develop an integrated energy plan every two years for electricity, natural gas, and transportation fuels, for the California Energy Policy Report. The plan calls for the State to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies a number of strategies, including assistance to public agencies and fleet operators in implementing incentive programs for zero emission vehicles (ZEV) and their infrastructure needs, and encouragement of urban designs that reduce VMT and accommodate pedestrian and bicycle access.

The CEC is in the process of updating the 2020 Integrated Energy Policy Report.[14] The 2020 Integrated Energy Policy Report provides the results of the CEC's assessments of a variety of energy issues facing California. Many of these issues will require action if the State is to meet its climate, energy, air quality, and other environmental goals while maintaining energy reliability and controlling costs. The 2020 Integrated Energy Policy Report covers a broad range of topics, including transportation, microgrids, and the *California Energy Demand Forecast*.[15]

IMPACT ANALYSIS

(a) **Less-Than-Significant Impact.** As is typical of any construction, the Project would temporarily consume energy for the operation of construction equipment and vehicles. During construction, standard methods of excavation and concrete pouring are planned. Construction activities do not include methods of construction which would result in inefficient or unnecessary use of energy resources. Post construction, no energy resources are needed in order to continuously operate the Project. Periodic maintenance energy resources would be negligible and would not result in wasteful, inefficient, or unnecessary consumption of energy resources. Given the foregoing, the Project's consumption of energy resources would be less than significant, as it would not represent unnecessary, inefficient, or wasteful use of energy resources.

(b) **No Impact.** Several levels of government have implemented regulatory programs in response to reducing greenhouse gas emissions (GHG) emissions, which consequently serve to increase energy efficiency. Several state agencies, including CARB, California Energy Commission, California Public Utilities Commission, CalRecycle, California Department of Transportation (Caltrans), and the Department of Water Resources have developed regulatory and incentive programs that promote energy efficiency. Many of the measures are generally beyond the ability of any future development to implement and are implemented at the utility provider or the manufacturer level. The installation of a new storm drain and associated improvements would ultimately decrease maintenance as the City would not need to respond to flooding and ponding events that have occurred at or around the Project site. As such, the Project would not conflict with or obstruct state or local plans for renewable energy or energy efficiency, and no related impact would occur.

MITIGATION MEASURES

None required.

SOURCES

- City of St. Helena General Plan Update 2040; Adopted May 14, 2019.

[14] California Energy Commission, 2021. 2020 Integrated Energy Policy Report. California Energy Commission. Docket # 20-IEPR-01. https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2020-integrated-energy-policy-report-update Accessed on March 16, 2021

[15] California Energy Commission, 2021. 2020 Integrated Energy Policy Report. California Energy Commission. Docket # 20-IEPR-01. https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2020-integrated-energy-policy-report-update Accessed on March 16, 2021

GEOLOGY/SOILS	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☐	☒
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☐	☒
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

The following discussion is based, in part, on a Geotechnical Study Report prepared for the proposed Project by RGH Consultants in December 2020. A copy of the Geotechnical Study Report is attached as Appendix A to this Initial Study/Mitigated Negative Declaration. The proposed Project has been designed based on the recommendations of the Geotechnical Study Report (Appendix A).

ENVIRONMENTAL SETTING

The Bay Area is one of the most seismically active regions in the Country. The City of St. Helena is located within the San Andreas Fault system, which is 44 miles wide and extends throughout much of the North Bay Area. The nearest active faults are: Rodgers Creek (13 miles west), Maacama Central (14 miles northwest), Hunting Creek – Berryessa (17 miles northeast), Concord-Green Valley (18 miles southeast), West Napa (21 miles south), and San Andreas (33 miles west). No active faults directly traverse the City; however, potential exists for geologic hazards in and around the urban limit line associated with ground shaking, including: liquefaction, ground failure, and seismically-induced landslides.

The Project site is relatively flat and does not contain evidence of any geologic activities such as faulting and land sliding, but is located in an area considered to be susceptible to ground motions. St. Helena is located within a seismically active area in California. The area is subject to geological hazards related primarily to seismic events (earthshaking) due to presence of active faults. However, the Project site is of relatively flat terrain and is not located within the Alquist-Priolo Special Study Zone.

The proposed pipeline alignment crosses generally level terrain (along Mills Lane) except at the bank of the Napa River. The alignment extends along the asphalt paved road until it ends about 600 feet east of the Napa River, where the alignment transitions to dirt vineyard roads. The shoulders are generally covered with seasonal grasses and weeds, except where there is existing development. These areas are generally gravel driveways and shoulders or consist of bushes and trees.

Napa County is located within the California Coast Range geomorphic province. This province is a geologically complex and seismically active region characterized by sub-parallel northwest-trending faults, mountain ranges and valleys. The oldest bedrock units are the Jurassic-Cretaceous Franciscan Complex and Great Valley sequence sediments originally deposited in a marine environment. Subsequently, younger rocks such as the Tertiary-age Sonoma Volcanics group, the Plio-Pleistocene-age Clear Lake Volcanics and sedimentary rocks such as the Guinda, Domengine, Petaluma, Wilson Grove, Cache, Huichica and Glen Ellen formations were deposited throughout the province. Extensive folding and thrust faulting during late Cretaceous through early Tertiary geologic time created complex geologic conditions that underlie the highly varied topography of today. In valleys, the bedrock is covered by thick alluvial soil.

On October 27 and 28, 2020, RGH Consultants performed a geotechnical reconnaissance of the Project site and explored the subsurface conditions along the pipeline alignment by drilling eight borings to depths ranging from about 10 to 21 feet. The borings were drilled with a truck-mounted drill rig equipped with 6-inch diameter, solid stem augers and 8-inch diameter, hollow stem augers at the approximate locations (See Appendix A, Geotechnical Study Report, shown on the Exploration Plan, Plate 2). The boring locations were determined approximately by pacing their distance from features shown on the Exploration Plan and should be considered accurate only to the degree implied by the method used. RGH Consultants' staff engineer located and logged the borings and obtained samples of the materials encountered for visual examination, classification, and laboratory testing.

The Geotechnical Study Report notes that the alignment is underlain by alluvial fan deposits headward to terrace deposits (Qyf). The deposits are shown to consist of moderately sorted fine sand and silt and gravel. According to the report, large-scale slope instability at the Project site was not indicated, and no active landslides were observed at the site during the study.

REGULATORY SETTING

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act was passed following the 1971 San Fernando earthquake. The act ensures public safety by prohibiting the siting of most structures for human occupancy across traces of active faults that constitute a potential hazard to structures from surface faulting or fault creep. Alquist-Priolo maps are distributed to affected cities, counties, and state agencies for their use in planning and controlling new construction.

Seismic Hazards Mapping Act

Following the 1989 Loma Prieta earthquake, the Seismic Hazards Mapping Act (SHMA) was passed. The SHMA directs the Department of Conservation, California Geological Survey to identify and map areas prone to liquefaction,

earthquake-induced landslides, and amplified ground shaking. It also requires that agencies only approve projects in seismic hazard zones following site-specific geotechnical investigations to determine if the identified hazard is present and requires the inclusion of measures to reduce earthquake-related hazards.

California Building Standards Code

The California Building Standards Code (CBC) contains the regulations that govern the construction of buildings in California and prescribes standards for constructing safer buildings. The CBC contains provisions for earthquake safety based on factors including occupancy type, soil and rock profile, ground strength, and distance to seismic sources. The CBC requires that a site-specific geotechnical investigation report be prepared by a licensed professional for proposed developments to evaluate seismic and geologic conditions that may affect a project, such as surface fault ruptures, ground shaking, liquefaction, differential settlement, lateral spreading, expansive soils, and slope stability. The CBC is updated every three years; the current version is the 2019 CBC.

California Division of Occupational Safety and Health Regulations

Excavation, shoring, and trenching activities during construction are subject to occupational safety standards for stabilization by the California Division of Occupational Safety and Health (Cal/OSHA) under Title 8 of the California Code of Regulations and Excavation Rules. These regulations minimize the potential for instability and collapse that could injure construction workers on the site.

Paleontological Resources Regulations

Paleontological resources are the fossilized remains of organisms from prehistoric environments found in geologic strata. These resources are valued for the information they yield about the history of the earth and its past ecological settings. California Public Resources Code (Section 5097.5) specifies that unauthorized removal of a paleontological resource is a misdemeanor. Under the CEQA Guidelines, a project would have a significant impact on paleontological resources if it will disturb or destroy a unique paleontological resource or site or unique geologic feature.

St. Helena General Plan Update 2040

The General Plan Update 2040 includes the following policies related to geologic and seismic safety:

PS3.1 – Minimize risk of injury, loss of life and property damage from seismically-induced and other known geologic hazards.

PS3.2 – Restrict the intensity of development and the level of landform alteration in the hillside areas in orderto minimize the potential for slope failure.

PS3.3 – The required soils and geologic reports for new development shall include geotechnical analysis for construction in areas with potential geological hazards and/or for purposes of environmental analysis. The analysis shall investigate all potential geo-hazard issues for the site where there is substantial evidence of a potential risk.

PS3.4 – Geologic reports for new development shall describe hazards and include mitigation measures to reduce risks to acceptable levels. Where appropriate, an engineer's or geologist's certification shall be required stating that risks have been mitigated to an acceptable level.

Highway 29 Specific Plan

The utilities, infrastructure and grading section explains the utilities, other infrastructure, and grading needed to serve development proposed in the Specific Plan area. Providing adequate and timely utility service is essential in ensuring orderly and safe development.

Policies specific to the Project include:

- Grading should be limited to the minimum necessary to improve site drainage. Grading operations undertaken to raise building pads or sites out of a 100-year flood plain shall conform to the City's Flood Protection Ordinance (Chapter 5B of the Municipal Code).
- Grading of individual sites within the Specific Plan area will likely be needed to improve site drainage

and, in some instances, to raise building pads out of flood hazard areas.

IMPACT ANALYSIS

(a(i)) **Less-Than-Significant Impact.** Fault rupture occurs when the ground surface fractures as a result of fault movement during an earthquake and almost always follows preexisting fault traces, which are zones of weakness. Given that the Project site is not considered part of the Alquist-Priolo Earthquake fault zone and no identified active faults traverse the site, there is no expectation that the site would be vulnerable to fault rupture. The nearest fault is the West Napa Fault, which had movement in 2014. The northern limit of rupture for the West Napa Fault was approximately 14 miles to the south of the Project site. Other nearby faults with surface rupture include the Rodgers Creek Fault, located approximately 13 miles west of the City and the San Andreas Fault zone, located 33 miles west. There is no risk of fault-related ground rupture during earthquakes within the limits of the Project site due to a known Alquist-Priolo Earthquake Fault Zone. Therefore, the impacts expected due to fault rupture at the Project site are less than significant.

(a(ii)) **Less-Than-Significant Impact.** The nearest fault is the West Napa Fault, which had movement in 2014. The northern limit of rupture for the West Napa Fault was approximately 14 miles to the south of the Project site. Like most of California, the Project site is susceptible to strong seismic shaking during an earthquake. The Project includes the installation of new storm drain infrastructure along Mills Lane, which is a City street for most of its length, from its intersection with State Highway 29 east to the Napa River. The area of disturbance is limited to roughly 4,900 (mostly linear) feet of flat pavement and dirt road. The Project would be required to comply with the provisions of the 2019 California Building Code (CBC), which contains requirements for structural design, including seismic design specifications. Since the Project includes storm drain improvements and does not include any Project features that would involve placing people or structures at risk in the event of an earthquake, the impacts in relation to this issue are less than significant. Furthermore, compliance with the mandatory building code structural specifications, as well as adherence to Geotechnical Study Report recommendations, would result in structures that would adequately resist adverse effects from seismic ground shaking. Therefore, impacts associated with strong seismic ground shaking would be less than significant.

(a(iii)) **Less-Than-Significant Impact.** Liquefaction is a phenomenon associated with fine-grained, loosely-packed sands and gravels subjected to ground shaking as a result of seismic activity. Liquefaction can lead to total and/or differential settlement and is largely dependent upon the intensity of ground-shaking and response of soils underlying the site. According to the Susceptibility Map of the San Francisco Bay Area, the Project area is mapped as having a Moderate susceptibility to liquefaction. As previously stated, the foundation and structural design for the proposed Project will meet the latest CBC regulations as well as state and local ordinances for seismic safety. Therefore, hazards related to ground failure and/or liquefaction will be less than significant.

(a(iv)) **No Impact.** The risk of landslide is dictated by several factors including precipitation conditions, soil types, steepness of slope, vegetation, seismic conditions and level of human disturbance. When certain conditions are present, landslides can be triggered as a result of seismic activity. Landslides have been known to occur within Napa County, but are typically confined to slopes steeper than 15% and occur in areas underlain by geologic units that have demonstrated stability problems. Based on the Project site's relatively flat topography, the proposed improvements are not located in an area susceptible to landslides. Therefore, the project will have no impacts due to loss of structures or life from landslides.

(b) **Less-Than-Significant Impact.** Sandy soils on moderate slopes or clayey soils on steep slopes are susceptible to erosion when exposed to concentrated surface water flow. The Project site is relatively flat; therefore, the risk of significant erosion is low. However, the potential for erosion is increased when established vegetation is disturbed or removed.

Development of the Project will require site preparation and grading activities that will potentially

result in soil erosion or the loss of topsoil if not properly controlled. Water and wind serve as the primary catalyst of soil erosion, with steeper slopes intensifying the effects. Vegetation removal as part of the site preparation process as well as grading and ground disturbing activities associated with development can heighten the potential for and accelerate soil erosion.

All ground activities associated with the Project are subject to the City of St. Helena's Erosion and Sediment Control Plan requirements (Chapter 13.32.090 D.3 of the Municipal Code) as a condition of Project approval. The erosion control plan is required to identify techniques such as site watering, sediment capture, equipment staging and laydown pad, and other erosion control measures to be implemented during construction activity on the Project site.

Adherence to uniformly applied development standards, including the preparation of an Erosion and Sediment Control Plan, will ensure that any potential impacts due to erosion and sedimentation will ensure that the Project does not result erosion. Therefore, the Project will generate a less-than-significant impact related to soil erosion or loss of topsoil.

(c) **Less-Than-Significant Impact.** Lateral spreading, lurching and associated ground failure can occur during strong ground shaking on certain soil substrate typically on slopes. Lurching generally occurs along the tops of slopes where stiff soils are underlain by soft deposits or along steep channel banks whereas lateral spreading generally occurs where liquefiable deposits flow towards a "free face," such as channel banks, during an earthquake.

Conformance with standards set forth in the Building Code of Regulations, Title 24, Part 2 (the California Building Code 3.7-20 Chapter 3: Setting, Impacts, and Mitigation Measures [CBC]) and the California Public Resources Code, Division 2, Chapter 7.8 (the Seismic Hazards Mapping Act) will ensure that potential impacts due to a geologic unit or soil that is unstable, or that would become unstable as a result of the Project would be corrected through adherence to design level recommendations provided by the geotechnical engineer. Therefore, impacts associated with a geologic unit or soil that is unstable would be less than significant.

(d) **Less-Than-Significant Impact.** Expansive soil occurs when clay particles interact with water causing volume changes in the clay soil. The clay soil may swell when saturated and shrink when dried. This phenomenon generally decreases in magnitude with increasing confinement pressure at depth. These volume changes may damage lightly loaded foundations, flatwork, and pavement. Expansive soil also causes soil creep on sloping ground. The Project site could contain soils that exhibit expansive potential. In general, expansive soils tend to swell with increases in soil moisture and shrink as the soil moisture decreases. Changes in soil moisture content can compromise the integrity of foundations, retaining walls and slab on grade improvements from differential movements (settlement or heave).

Conformance with standards set forth in the Building Code of Regulations, Title 24, Part 2 (the California Building Code 3.7-20 Chapter 3: Setting, Impacts, and Mitigation Measures [CBC]) and the California Public Resources Code, Division 2, Chapter 7.8 (the Seismic Hazards Mapping Act) will ensure that potential impacts due to the presence of expansive soils or a geologic unit or soil that is unstable, or that would become unstable as a result of the Project would be corrected through adherence to design level recommendations provided by the geotechnical engineer. Therefore, Project impacts associated with expansive soils would be less than significant.

(e) **No Impact.** The Project would not involve the use of septic tanks or alternative wastewater disposal systems. Therefore, the Project would have no impact related to septic tanks or alternative wastewater disposal systems.

(f) **Less-Than-Significant Impact.** Paleontological resources include fossilized remains or traces of organisms including plants, vertebrates (animals with backbones), invertebrates (e.g., starfish, clams, ammonites, and marine coral), and microscopic plants and animals (microfossils), including their imprints, from a previous geological period. Collecting localities and the geologic formations containing those localities are also considered paleontological resources as they represent a limited, non-renewable resource and once destroyed, cannot be replaced. The Society of

Vertebrate Paleontology (SVP) has established guidelines for the identification, assessment, and mitigation of adverse impacts on non-renewable paleontological resources. The SVP has helped define the value of paleontological resources and, in particular, states that significant paleontological resources are fossils and fossiliferous deposits consisting of identifiable vertebrate fossils, large or small, uncommon invertebrate, plant, and trace fossils, and other data that provide taxonomic, phylogenetic, paleoecologic, stratigraphic, and/or biochronologic information. Paleontological resources are considered to be older than recorded human history and/or older than middle Holocene (i.e., older than about 5,000 years).

The Project would not require modification of any known unique geologic features. In the event of inadvertent discovery of paleontological resources during construction, the contractor would be required to follow regulated procedures outlined in Public Resources Code § 5097.5 for evaluating and protecting paleontological resources. This would include halting construction in order for a professional paleontologist to evaluate the find for its scientific value or uniqueness, as well as recovery of the resource for any necessary treatment that is consistent with currently accepted scientific practices. Any fossils collected from the area would then be deposited in an accredited and permanent scientific institution where they will be properly curated and preserved. Because of the low potential for paleontological resources to be encountered and because the measures to prevent direct or indirect destruction, the impact to such unanticipated resources would be less than significant.

MITIGATION MEASURES

None Required.

SOURCES

- City of St. Helena General Plan Update 2040; Adopted May 14, 2019.
- Geotechnical Study Report, RGH Consultants, December 2020.

Greenhouse Gas Emissions	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may havea significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

ENVIONMENTAL SETTING

Climate change refers to change in the Earth's weather patterns, including the rise in temperature due to an increase in heat-trapping greenhouse gases (GHGs) in the atmosphere. An increase of GHGs in the atmosphere affects the energy balance of the Earth and results in a global warming trend. Increases in global average temperatures have been observed since the mid-20th century, and have been linked to observed increases in GHG emissions from anthropogenic sources. The primary GHG emissions of concern are carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O). Other GHGs of concern include hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6), but their contribution to climate change is less than 1 percent of the total GHGs that are well-mixed (i.e., that have atmospheric lifetimes long enough to be homogeneously mixed in the troposphere).[16] Each GHG has a different global warming potential (GWP). For instance, CH_4 traps about 21 times more heat per molecule than CO_2. As a result, emissions of GHGs are reported in metric tons of carbon dioxide equivalents (CO_2e), wherein each GHG is weighted by its GWP relative to CO_2.

According to the Intergovernmental Panel on Climate Change (IPCC), the atmospheric concentrations of CO_2, CH_4, and N_2O have increased to levels unprecedented in at least the last 800,000 years due to anthropogenic sources.[17] Some of the potential effects of increased GHG emissions and the associated climate change may include loss in snow pack (affecting water supply), sea level rise, more frequent extreme weather events, more large forest fires, and more drought years. In addition, climate change may increase electricity demand for cooling, decrease the availability of hydroelectric power, and affect regional air quality and public health.[18]

In October 2018, the IPCC published a special report on potential long-term climate change impacts based on the projected increases in temperature due to global climate change. The IPCC report found that we are already seeing the consequences of global warming due to a 1 degree Celsius (°C) increase in pre-industrial levels, such as extreme weather, rising sea levels, and diminishing Arctic sea ice. Global warming is likely to reach 1.5°C above pre-industrial levels between 2030 and 2052 if it continues to increase at the current rate. Some of the impacts due to ongoing global warming could be avoided by limiting future global warming to 1.5°C compared to 2°C. For example, by limiting global warming to 1.5°C or lower, the likelihood of an Arctic Ocean free of sea ice in summer would be ten times lower compared to the likelihood under the scenario of 2°C increase. Beyond the 1.5°C threshold, there would

[16] Intergovernmental Panel on Climate Change (IPCC). 2013. Climate Change 2013; the Physical Science Basis; Working Group I Contribution to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change.
[17] *Ibid.*
[18] Bay Area Air Quality Management District (BAAQMD). 2017. Final 2017 Clean Air Plan. April 19.

be significant increases in the risk associated with long-lasting or irreversible changes, such as the loss of ecosystems. The IPCC states that in order to limit the global warming to 1.5°C, rapid transitions are needed in land, energy, industry, building, transport, and urban sectors to reach the goal of carbon neutrality by 2050, which means that the Earth's production of GHG emissions each year would be removed completely through carbon offsetting, sequestration, or other means.[19]

REGULATORY SETTING

In 2006, the California State Legislature passed the California Global Warming Solutions Act (Assembly Bill [AB] 32), which requires the California Air Resources Board (CARB) to develop and implement regulatory and market mechanisms that will reduce GHG emissions to 1990 levels by 2020. In 2016, the State Legislature adopted Senate Bill (SB) 32, which requires further reduction of GHG emissions to 40 percent below the 1990 level by 2030. In addition, Executive Order S-3-05 set a GHG reduction goal of 80 percent below 1990 levels by 2050.

St. Helena General Plan Update 2040

The City of St. Helena provides a policy framework for responding to and planning for climate change in the City's General Plan Update 2040, the Climate Change Element. The Climate Change Element includes the following policies and actions that are applicable the proposed Project:

CC2.1 – Encourage measures to reduce energy demand through conservation and efficiency.

CC2.E – Reduce greenhouse gas emissions from buildings and energy use. Require or request that new development projects analyze greenhouse gas emissions due to energy use and incorporate energy and safe yield water conservation measures into projects.

CC3.A – Establish programs and create incentives to achieve a 75 to 90 percent citywide construction and demolition debris waste diversion level in support of Statewide goals.

IMPACT ANALYSIS

(a) **Less-Than-Significant Impact.** The proposed Project would generate temporary GHG emissions through construction activities, such as operation of on-site heavy construction equipment and off-site construction vehicle trips, and would generate long-term GHG emissions through Project operations related to the direct and indirect use of fossil fuels such as electricity, diesel, and gasoline.

The Bay Area Air Quality Management District (BAAQMD) does not recommend a threshold of significance for GHG emissions during construction because there is not sufficient evidence to determine a level at which temporary construction emissions are significant. A construction contractor has no incentive to waste fuel during construction and, therefore, it is generally assumed that GHG emissions during construction would be minimized to the maximum extent feasible. Furthermore, the idling times for off-road construction equipment would be limited to a maximum idling time to 5 minutes, as required by the CARB's Airborne Toxic Control Measure to reduce emissions from diesel-fueled vehicles (Title 13, Section 2485 of California Code of Regulations). Therefore, GHG emissions during project construction would have a less-than-significant impact on the environment.

Operation of the proposed Project would generate direct GHG emissions from vehicles accessing the site for inspection and cleaning, and indirect GHG emissions from the electrical tools that may be used for storm drain maintenance purpose. Because of the infrequent nature of inspection and cleaning, it is unlikely that operation of the proposed Project would generate any substantial amount of GHGs. Therefore, the proposed Project would result in minimal change, if any, in GHG emissions compared to the existing conditions, and would have a less-than-significant impact on the environment.

(b) **Less-Than-Significant Impact.** The BAAQMD's thresholds of significance were designed to ensure

[19] Intergovernmental Panel on Climate Change (IPCC). 2013. Climate Change 2013; the Physical Science Basis; Working Group I Contribution to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change.

compliance with the state's AB 32 GHG reduction goals, as set forth in the CARB's Climate Change Scoping Plan (California Air Resources Board, 2017). Since the GHG emissions from the proposed Project would have a less-than-significant impact (Criteria VIII.a), it can be assumed that the project would be consistent, and not in fundamental conflict, with the AB 32 Scoping Plan and the City's General Plan. Therefore, the Project would have a less-than-significant impact related to plan consistency.

MITIGATION MEASURES

None Required.

SOURCES

- Bay Area Air Quality Management District (BAAQMD). 2017. Final 2017 Clean Air Plan. April 19.
- Bay Area Air Quality Management District (BAAQMD). 2017. California Environmental Quality Act Air Quality Guidelines. May.
- Bay Area Air Quality Management District (BAAQMD), 2009. Revised Draft Options and Justification Report, California Environmental Act Thresholds of Significance, October.
- City of St. Helena General Plan Update 2040; Adopted May 14, 2019.
- Intergovernmental Panel on Climate Change (IPCC, 2018. IPCC Press Release, Summary for Policymakers of IPCC Special Report on Global Warning of 1.5°C approved by governments. October 8.
- Intergovernmental Panel on Climate Change (IPCC). 2013. Climate Change 2013; the Physical Science Basis; Working Group I Contribution to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change.

HAZARDS AND HAZARDOUS MATERIALS	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) 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?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

DISCUSSION

Regulations governing the use, management, handling, transportation and disposal of hazardous waste and materials are administered by Federal, State and local governmental agencies. The California Department of Toxic

Substances Control (DTSC) defines a hazardous material as: "a substance or combination of substances that, because of its quantity, concentration or physical, chemical, or infectious characteristics, may either: (1) cause, or significantly contribute to an increase in mortality or an increase in serious, irreversible, or incapacitating illness; or (2) pose a substantial present or potential hazard to human health or environment when improperly treated, stored, transported, disposed of, or otherwise managed."

REGULATORY SETTING

Pursuant to the Planning and Zoning Law, DTSC maintains a hazardous waste and substances site list, also known as the "Cortese List". Hazardous waste management in the City of St. Helena is administered through the County-wide integrated Waste Management Plan. The St. Helena Fire Department oversees the acquisition, maintenance and control of hazardous waste for all activities within the City.

In 2005 the Association of Bay Area Governments (ABAG) released "Taming Natural Disasters", which acts as a multi-jurisdictional local hazard mitigation plan for the San Francisco Bay Area. The intent of the plan is to enhance disaster resilience throughout the region, pursuant to the Disaster Mitigation Act of 2000. The Plan was subsequently updated in 2010 and has since been approved by the Federal Emergency Management Agency (FEMA) and formally adopted by ABAG.

General Plan Update 2040

The following General Plan policies relate to the use and storage of hazardous materials:

PS4.3 – Protect St. Helena residents from health and safety impacts related to the use, storage, manufacture, and transport of hazardous materials.
PS4.4 – Discourage new uses that rely extensively on the use of hazardous materials.
PS4.5 – Facilitate communication and education about fire safety, non-point source pollution, household hazardous waste disposal, and recycling opportunities.
PS4.6 – Ensure that all streets and roads are adequate in terms of width, turning radius, and grade in order to facilitate access by City firefighting apparatus, and to provide alternative emergency routes of ingress and egress.

Implementing Actions:

PS4.D – Require all new development to meet the minimum fire flow rates specified by the City's Fire Code.
PS4.E – Require all new development plans to be approved by the Fire Department prior to the issuance of building permits, grading permits, or final map approval.
PS4.G – Review all new development proposals for their potential to introduce the production, use, storage and/or transport of hazardous materials, and require reasonable controls on such materials.
PS5.H – Implement low impact development practices for new development and redevelopment projects to reduce stormwater peak flow rates and volumes from smaller, more frequently occurring storm events.
PS4.K – Require environmental assessments during the planning for development in areas previously used for agricultural, commercial, or industrial uses. Remediation of identified contamination that may result in health risks to construction workers and future owners and users shall be required prior to approval of construction, demolition, and grading permits for development.

IMPACT ANALYSIS

(a-b) **Less-Than-Significant Impact.** Site preparation and construction activities will result in the temporary presence of potentially hazardous materials including, but not limited to fuels and lubricants, paints, solvents and other construction related materials onsite. Although these potentially hazardous materials may be present on-site during construction, the contractor is required to comply with all existing federal, state and local safety regulations governing the transportation, use, handling, storage and disposal of potentially hazardous materials. Once

construction is complete there will not be any ongoing use or generation of hazardous materials on-site.

During site preparation and construction activities Best Management Practices (BMPs) will be implemented in accordance with the City's Municipal Code Chapter 13.32 Stormwater and Runoff Pollution Control requirements. BMPs include measures to prevent spills and require onsite materials for cleanup. The applicant is required to comply with all federal and state regulations as overseen by Napa County's Certified Unified Program Agency (CUPA). There would be no new stationary source of hazardous emissions or handling of acutely hazardous materials or waste associated with the Project. Accordingly, compliance with all applicable local, state and federal laws will ensure that potential impacts related to the creation of a significant hazard are at less than significant levels to routine, upset or accidental release.

(c) **Less-Than-Significant Impact.** There are three schools located within one-quarter mile of the Project site. St. Helena High School is located approximately 750 feet southwest of Mills Lane, at 1401 Grayson Avenue. The St. Helena Montessori School and The Young School Independent Montessori are located 1000 feet to the northwest of Mills Lane. As discussed above, the transport, use, or disposal of hazardous materials would be limited to typical equipment used during construction or routine maintenance and the operation of which is subject to regulations. Post construction, the storm drain improvements would not involve any transport, use, or disposal of hazardous materials, nor would they emit hazardous emissions. There would be no new stationary source of hazardous emissions or handling of acutely hazardous materials or waste associated with the Project. Therefore, impacts are less than significant in relation to this issue.

(d) **Less-Than-Significant Impact.** The Project is not located on a site listed on the Cortese lists or LUST pursuant to Section 65962.5. Therefore, this impact is identified as less than significant.

(e) **No Impact.** The Project site is located over two miles from an airport or airstrip, therefore, no impacts associated with airports are anticipated.

(f) **No Impact.** The Project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. The proposed Project would not alter any existing emergency response or evacuation routes. California has developed an emergency response plan to coordinate emergency services by federal, state, and local government, including responding to hazardous materials incidents. The State Office of Emergency Services (OES) employs a Hazardous Materials (Haz Mat) Division, which enforces multiple programs that address hazardous materials. There are no aspects of the proposed Project that will interfere with an adopted emergency or evacuation plan. Therefore, the Project will have no impacts due to a conflict with the emergency response plan.

(g) **Less-Than-Significant Impact**. The City is characterized by a narrow valley floor surrounded and intermingled with steep hill terrain, containing areas which are susceptible to wildland fires. Wildland fires are of concern particularly in expansive areas of native vegetation of brush, woodland, grassland and forest. However, the Project site is located within a developed area, and according to the 2007 CAL FIRE "Fire Hazard Severity Zones" Map, the site is located outside of the "Very High Fire Hazard Severity Zone" and categorized as Non-VHFHZ. Accordingly, the Project will have less-than-significant impacts related to the exposure of people or structure to wildland hazards.

MITIGATION MEASURES

None required.

SOURCES

- Cal Fire, Napa County FHSZ (Fire Hazard Safety Zone) Map (website accessed March 2018) http://frap.fire.ca.gov/webdata/maps/napa/fhszs_map.28.pdf.
- City of St. Helena General Plan Update 2040; Adopted May 14, 2019.
- City of St. Helena, Highway 29 Specific Plan, February 22, 2005.

HYDROLOGY/WATER QUALITY	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in a substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☐	☒
iii) 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; or	☐	☐	☒	☐
iv) impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

ENVIRONMENTAL SETTING

The City is divided into two major subwatersheds, York Creek and Sulphur Creek. Both watersheds drain into the Napa River watershed.

The proposed Project is part of the Highway 29 Specific Plan and City of St. Helena Storm Drain Master Plan that will discharge into the Napa River. The site slopes gently to the northeast, towards the Napa River. The adjacent unimproved areas also drain towards the Napa River. There is an existing subsurface drainage system in Highway 29 that discharges into a roadside drainage ditch along Mills Lane. This existing storm drain system collects runoff from a portion of Highway 29 and the adjacent land to the southwest, opposite Mills Lane.

The Project does not propose to divert stormwater between watersheds, but redirect much of the overland flow into a subsurface system. In its current condition, stormwater runoff from a portion of Highway 29 and the adjacent land to the southwest is collected via multiple inlets, routed through a subsurface storm drain system, and discharged into a roadside drainage ditch adjacent to Mills Lane. This drainage ditch slopes gently to the northeast, towards the Napa River. In the proposed condition, the stormwater runoff from Highway 29 will instead remain underground until it ultimately discharges into the Napa River. The proposed storm drain system will be located under Mills Lane, and will also receive stormwater runoff from the future Farmstead development, located at 1000 Mills Lane. The drainage ditch is expected to remain in place, though the flow within the ditch is expected to decrease. Increases to the stormwater flow within the existing highway subsurface drainage system are not anticipated with this project.

The Preliminary Stormwater Hydrology Analysis (Appendix B) concluded that Project improvements will not increase the overall impervious area on site, therefore the Project is not anticipated to increase stormwater runoff and is not subject to hydromodification requirements. The Preliminary Stormwater Hydrology Analysis also concluded that the proposed storm drain system is expected to have adequate capacity to convey the anticipated flows from the 10-year and even 100-year storms.

REGULATORY SETTING

Water Quality

The Federal Clean Water Act prohibits discharges of storm water containing pollutants except in compliance with a National Pollutant Discharge Elimination System (NPDES) Permit. The NPDES program regulates stormwater discharges from municipal separate storm sewer systems (MS4s), construction activities, and industrial activities.

Acting per the mandate of the Clean Water Act, the California State Water Resources Control Board has issued a NPDES Construction General Permit to regulate construction activities and a NPDES General Permit for the Discharge of Storm Water for MS4s, Phase I and Phase II (Stormwater General Permit). The Construction General Permit requires construction projects that disturb one acre or more of soil to develop a Stormwater Water Pollution Prevention Plan (SWPPP). Phase II of the Stormwater General Permit requires small MS4s, including the City of St. Helena, to regulate storm water discharges. Per Provision E.12, "Post-Construction Stormwater Management Program," of the Phase II Stormwater General Permit, municipalities must require that development plans include specified features and facilities that will control pollutant sources; control runoff volumes, rates, and durations; and will treat runoff before leaving the site.

The City of St. Helena enforces Provision E.12 by requiring developers to comply with the guidelines in the Bay Area Stormwater Management Agencies Association (BASMAA) Post-Construction Manual (Manual). The Manual stipulates minimum requirements for different types of development projects. Per the Manual, a Regulated Project is a project that creates or replaces 5,000 square feet or more of impervious surface. Regulated Projects must route all runoff from impervious surfaces to bioretention facilities or landscaped retaining areas. Compliance with the Manual must be documented in a Stormwater Control Plan.

Groundwater Supply

The City of St. Helena follows the State of California's Model Water Efficient Landscape Ordinance, which requires water efficient landscapes in new landscape projects over 500 square feet and retrofitted landscapes over 2,500 square feet.

Drainage

Per Section 16.32.070 of the City of St. Helena Municipal Code, stormwater runoff from development projects must be collected and conveyed in a storm drainage system capable of collecting and conveying runoff generated by a 10-

year flood. The system must also provide for the protection of abutting and off-site properties that may be adversely affected by any increase in runoff attributed to the development.

IMPACT ANALYSIS

(a) **Less-Than-Significant Impact.** Project construction activities have the potential to degrade water quality as a result of erosion caused by earthmoving activities during construction or the accidental release of hazardous construction chemicals. If not properly managed, construction activities could result in erosion, as well as the discharge of chemicals and materials, such as concrete, mortar, asphalt, fuels, and lubricants. Applicable water quality standards and waste discharge requirements could be violated, and polluted runoff could substantially degrade water quality.

The Project's potential impacts to water quality result from stormwater runoff from the Project site during construction and post-construction. As the Project will disturb more than one acre of soil during construction, the project will be required to prepare a Stormwater Pollution Prevention Plan (SWPPP) per the National Pollutant Discharge Elimination System (NPDES) Construction General Permit prior to beginning construction. A SWPPP identifies all potential pollutants and their sources, including erosion, sediments, and construction materials and must include a list of BMPs to reduce the discharge of construction-related stormwater pollutants. A SWPPP must include a detailed description of controls to reduce pollutants and outline maintenance and inspection procedures. Typical sediment and erosion control BMPs include protecting storm drain inlets, and establishing and maintaining construction exits and perimeter controls to avoid tracking sediment off-site onto adjacent roadways. A SWPPP also defines proper building material staging and storage areas, paint and concrete washout areas, describes proper equipment/vehicle fueling and maintenance practices, measures to control equipment/vehicle washing and allowable non-stormwater discharges, and includes a spill prevention and response plan. The SWPPP must also include a construction site monitoring program. Depending on the project risk level, the monitoring program would involve visual observations of site discharges, water quality monitoring of site discharges (e.g., pH, turbidity, and non-visible pollutants, if applicable), and receiving water monitoring (e.g., pH, turbidity, suspended sediment concentration, and bioassessment, if applicable). Compliance with the requirements of the Construction General Permit would ensure that construction activities do not adversely affect runoff water quality that could result in a violation of water quality standards. Because the Project would implement applicable erosion, sediment and pollution control measures during construction, the potential impact related to degrading water quality would be less than significant.

(b) **Less-Than-Significant Impact.** The proposed Project would not involve the use of groundwater. The installation of a new storm drain along Mills Lane would recharge groundwater supplies. For this reason, the potential effects to groundwater supplies and groundwater recharge would be less than significant.

(c-i) **Less-Than-Significant Impact.** As discussed in the Preliminary Stormwater Hydrology Analysis (Appendix B), the Project does not propose to divert stormwater between watersheds, but redirect much of the overland flow into a subsurface system. The proposed storm drain system will reroute existing discharge from a roadside ditch, as well as pick up future discharge from the proposed future Farmstead development located at 1000 Mills Lane. In its current condition, stormwater runoff from a portion of Highway 29 and the adjacent land to the southwest is collected via multiple inlets, routed through a subsurface storm drain system, and discharged into a roadside drainage ditch adjacent to Mills Lane. This drainage ditch slopes gently to the northeast, towards the Napa River. In the proposed condition, the stormwater runoff from Highway 29 will instead remain underground until it ultimately discharges into the Napa River. The proposed storm drain system will be located under Mills Lane, and will also receive stormwater runoff from the future Farmstead development. The drainage ditch is expected to remain in place, though the flow within the ditch is expected to decrease. Increases to the stormwater flow within the existing highway subsurface drainage system are not anticipated with this Project. Although the proposed Project would alter the existing drainage pattern with installation of the proposed storm drain, the altered drainage pattern would help direct stormwater flows to underground thus preventing potential soil erosion as under existing conditions. The proposed Project would reduce

on-site erosion and on- and off-site siltation. Therefore, impacts would be less than significant.

(c-ii) **No Impact.** According to the Preliminary Stormwater Hydrology Analysis, Project improvements will not increase the overall impervious area on site, therefore the Project is not anticipated to increase stormwater runoff and is not subject to hydromodification requirements. Although the drainage pattern of the area would be altered as a result of the installation of the Project-related underground storm drain improvements, the proposed improvements will not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Since the Project is not anticipated to alter the total existing impervious area of Mills Lane, the runoff generated within the Project limits is not expected to increase with Project improvements. No impact would occur.

(c-iii) **Less-Than-Significant Impact.** The Project would not impede flows but would result in improvements to accommodate for proposed future development around the Project site. According to the Preliminary Stormwater Hydrology Analysis, the proposed storm drain system is expected to have adequate capacity to convey the anticipated flows from the 10-year and even 100-year storms. Furthermore, Project improvements will not increase the overall impervious area on site, therefore the Project is not anticipated to increase stormwater runoff and is not subject to hydromodification requirements. Since this alteration of the drainage pattern is an intended improvement and lessens the current adverse conditions, impacts are considered less than significant.

(c-iv) **Less-Than-Significant Impact.** According to the Preliminary Stormwater Hydrology Analysis, the proposed storm drain system is expected to have adequate capacity to convey the anticipated flows from the 10-year and even 100-year storms. Per the Highway 29 Specific Plan and the Storm Drain Master Plan, the new storm drain in Mills Lane is a planned storm drainage system and will be designed to have capacity for the runoff from the proposed Farmstead development located at 1000 Mills Lane. The Project would not impede but it would redirect flows. Flows that currently are not accommodated by the existing infrastructure or the adjacent channel would be captured and redirected through the proposed infrastructure improvements. This is considered a beneficial impact. Therefore, the Project would have a less-than-significant impact in relation to this issue.

(d) **No Impact.** Seiche and tsunami are short duration, earthquake-generated water waves in large enclosed bodies of water and the open ocean, respectively. Mudflows typically occur on steep slopes where vegetation is not sufficient to prevent rapid erosion. The Project site is not located near the Pacific Ocean, near any large enclosed bodies of water, or near any sparsely vegetated steep slopes. The Project site is located in a relatively flat developed area and the potential for mudflows is considered unlikely. Therefore, the risk of releasing pollutants due to seiche, tsunami, or mudflow inundation at the site is low to non-existent and the Project will have no impact.

(e) **No Impact.** The Project site is located within the area subject to the San Francisco Bay Water Quality Control Board's Basin Plan (Basin Plan). The Basin Plan lists action plans and policies to achieve water quality objectives, protect present and future beneficial water uses, protect public health, and prevent nuisance. As described under criteria a) above, the Project will comply with applicable stormwater standards and permits that are specifically designed to reduce potential water quality impacts to a less-than-significant level. The Project as proposed would not conflict with or obstruct implementation of the regional Basin Plan. Therefore, no impact related to obstruction of the Basin Plan would result.

As described in criteria b) above, the Project would not utilize or decrease groundwater supplies at the Project site or substantially interfere with groundwater recharge. The Napa Valley Groundwater sub-basin is not presently subject to a Sustainable Groundwater Management Plan. There are no site-specific standards for groundwater management within the Napa Valley sub-basin that the Project would conflict with. No impact would result.

MITIGATION MEASURES

None required.

SOURCES

- Preliminary Stormwater Hydrology Analysis, BKF, April 2021 (Appendix B)
- Project Site Plans
- City of St. Helena General Plan Update 2040; Adopted May 14, 2019.

LAND USE/PLANNING	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

ENVIRONMENTAL SETTING

The City of St. Helena is divided into two distinct areas: a developed "urban service area" and a more, rural, agricultural, industrial area located around the periphery. The City exhibits a traditional landscape with the urbanized commercial land uses concentrated in the city center and along SR 29, with residential development radiating outwards to the northeast and southwest.

The outer edge of the urban service area is demarcated by the urban limit line (ULL), which is a parcel specific boundary that marks the limit of allowed urban development. The intent of the ULL is to discourage urban sprawl and promote sensitive development that preserves the rural and agricultural lands around the City. The Project site is located within the City of St. Helena's Urban Limit Line (ULL). The Project site is located on the northeast side of Main Street, along the entirety of Mills Lane, up until the Napa River. Mills Lane is surrounded by a variety of zones: Service Commercial (SC), Industrial (I), Agriculture (A-20), Winery (W). The Project site is surrounded by land designated as Agriculture to the north and east, and Industrial to the south and west.

The Project includes the installation of new storm drain infrastructure along Mills Lane, which is a City street for most of its length, from its intersection with State Highway 29 east to the Napa River. The area of disturbance is limited to roughly 4,900 (mostly linear) feet of flat pavement and dirt road. Once complete, the area of improvement would be repaved.

REGULATORY SETTING

ST. Helena General Plan Update 2040

The proposed Project is subject to land use policies outlined in the St. Helena General Plan which has been adopted for the purpose of avoiding or mitigating an environmental effect. Applicable policies are outlined below:

LU1.1 – Require new development to occur within well-defined boundaries and be consistent with the ability to provide urban services. New development should mitigate infrastructure impacts by using sustainable, best management practices in green building and stormwater management and paying its share of development impact fees, while minimizing impacts on sewer, water, energy, and natural resources.

LU1.2 – Allow urban development to occur only within the Urban Limit Line. Consider an exception for on-site employee housing on Agricultural lands. Urban services, such as sewer, water, and storm drainage, will only be extended to development within the Urban Limit Line.

The Urban Limit Line may only expand when the amount of developable land within the Urban Limit Line is insufficient to implement the General Plan policies or when logical to include developed lands receiving urban services from the City. Expansion outside the Urban Limit Line should first be considered in Urban Reserve Areas. Expansion into other areas outside the Urban Limit Line should be considered only when the proposed land use is found to further the goals and long-term objectives of the City and does not result in adverse impacts to adjacent uses in either the urban or rural areas.

Highway 29 Specific Plan

- Identify the major utility and infrastructure improvements needed to serve future development within the Specific Plan area to facilitate implementation of a phased installation program, if appropriate, and to ensure that installation costs will be fairly shared by all project participants.
- Ensure that adequate infrastructure and utilities are provided for new development in the Specific Plan area prior to or concurrent with project implementation.
- Encourage public purchase of portions of Sulphur Creek within the Specific Plan area for flood protection purposes.
- Grading should be limited to the minimum necessary to improve site drainage. Grading operations undertaken to raise building pads or sites out of a 100-year flood plain shall conform to the City's Flood Protection Ordinance (Chapter SB of the Municipal Code).

IMPACT ANALYSIS

(a) **No Impact.** Division of an established community typically occurs when a new physical feature, in the form of an interstate or railroad, physically transects an area, thereby removing mobility and access within an established community. The division of an established community can also occur through the removal of an existing road or pathway, which would reduce or remove access between a community and outlying areas. The proposed Project would not introduce a new physical feature that would remove mobility and access within an established community. Likewise, the project does not propose the removal of an existing road or pathway that could reduce or remove access between a community and outlying areas. Stormwater from the west side of town is currently conveyed east under Highway 29 and discharges on the north side of Mills Lane. The proposed Project consists of a new storm drain that will convey this runoff, as well as drainage from runoff east of Highway 29, and can service future development in the area, discharging to the Napa River. The Project is not expected to result in any division of an established community as it will not include (or remove) any physical features (such as a road or barrier) that divide, or reduce, access between the existing community and outlying areas. Therefore, there are no impacts to the division of community.

(b) **Less-Than-Significant Impact**. The proposed Project is required to comply with various policy documents, including the 1993 St. Helena General Plan, and the City of St. Helena's Zoning Ordinance. As described in the City's Storm Drain Master Plan, the proposed outfall in the Napa River is planned to serve the Project area. Construction of the new storm drain in Mills Lane and outfall in the Napa River has been undertaken by the City, and is consistent with the Highway 29 Specific Plan and the St. Helena Storm Drain Master Plan. The proposed Project does not involve any changes to land uses or zoning within the Project site. The Project is consistent with the underlying zoning district, Highway 29 Specific Plan and the General Plan Update. No changes are proposed to the site that would otherwise be in conflict with any applicable plan or regulation. the proposed Project would not conflict with an applicable land use plan, and impacts would be less than significant.

MITIGATION MEASURES

None required.

SOURCES

- City of St. Helena General Plan Update 2040; Adopted May 14, 2019.
- City of St. Helena Zoning Map, May 24, 2018.
- City of St. Helena Highway 29 Specific Plan, February 22, 2005.

Mineral Resources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?	☐	☐	☐	☒
b) 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?	☐	☐	☐	☒

ENVIRONMENTAL SETTING

The California Surface Mining and Reclamation Act of 1975 (SMARA) identifies mineral resources within California. These maps identify and classify mineral resources based on their relative value for extraction. According to the 1993 General Plan, surface materials in the St. Helena area are classified as "recent alluvium." The depth of the alluvium is likely to be in the range of 250 to 500 feet. Additionally, the General Plan states that there are no known mineral deposits of significance within the City with the exception of the aggregate (gravel) being mined from the stream bed of Sulphur Springs, which is west of SR 29 and not proximate to the Project site. To date, no aggregate mineral resources or other significant mineral resources have been mapped within the City of St. Helena.

IMPACT ANALYSIS

(a-b) **No Impact.** The Project does not lie within one of the listed aggregate deposits in the SMARA report as shown on the Napa Quadrangle. Neither the City of St. Helena's General Plan, nor the Surface Mining and Reclamation Act (SMARA) of 1975, identifies specific areas of mineral resources in this area of St. Helena. As there are no important mineral resources in the Project Site, the proposed Project would not result in the loss of availability of a mineral resource recovery site of local or statewide importance; thus, there would be no impact.

MITIGATION MEASURES

None required.

SOURCES

- City of St. Helena General Plan Update 2040; Adopted May 14, 2019.
- State of California, Surface Mining and Reclamation Act (SMARA) of 1975, updated in 1977.

NOISE	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

ENVIRONMENTAL SETTING

Noise Concepts and Terminology

Noise is commonly defined as unwanted sound that annoys or disturbs people and can have an adverse psychological or physiological effect on human health. Sound is measured in decibels (dB), which is a logarithmic scale. Decibels describe the purely physical intensity of sound based on changes in air pressure, but they cannot accurately describe sound as perceived by the human ear since the human ear is only capable of hearing sound within a limited frequency range. For this reason, a frequency-dependent weighting system is used and monitoring results are reported in A-weighted decibels (dBA).

Groundborne Vibration Concepts and Terminology

Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. Several different methods are used to quantify vibration. Typically, groundborne vibration generated by man-made activities attenuates rapidly with distance from the source of the vibration. Sensitive receptors to vibration include structures (especially older masonry structures), people (especially residents, the elderly, and sick), and vibration-sensitive equipment. Vibration amplitudes are usually expressed as either peak particle velocity (PPV) or the root mean square (RMS) velocity. The PPV is defined as the maximum instantaneous peak of the vibration signal. PPV is appropriate for evaluating potential damage to buildings, but it is not suitable for evaluating human response to vibration because it takes the human body time to respond to vibration signals. The response of the human body to vibration is dependent on the average amplitude of a vibration. The RMS of a signal is the average of the squared amplitude of the signal and is more appropriate for evaluating human response to vibration. PPV is normally described in units of inches per second (in/sec), and RMS is also often

described in vibration decibels (VdB).

Noise-Sensitive Receptors

Noise-sensitive receptors are defined as land uses where noise-sensitive people may be present or where noise-sensitive activities may occur. The nearest noise-sensitive receptors are residences located 35 feet north of the project alignment along Mills Lane.

Ambient Noise Environment

The primary sources of noise in the vicinity of the project site are: 1) traffic along Highway 29, which runs north to south adjacent to the project site; and 2) traffic along Silverado Trail South, which runs north to south to the east of the project site. Based on the noise contour map for the year 2018 in the St. Helena General Plan Update 2040, traffic noise levels are about 55 dBA Ldn within most of the project alignment along Mills Lane, but could range from 55 to 80 dBA Ldn near Highway 29 (within the western portion of the project alignment), and range from 55 to 60 dBA Ldn near Silverado Trail South (within the eastern portion of the project alignment).[20] These noise conditions for 2018 are expected to adequately characterize existing (2021) ambient noise conditions because a large increase in growth that could lead to substantial increases in traffic is not anticipated in the area.

REGULATORY SETTING

St. Helena General Plan Update 2040

The following relevant General Plan policies are contained within Chapter 9 Public Health, Safety, and Noise of the General Plan:

> **PS2.4 –** Require a reduction and/or control of the use of machinery, mechanical systems and other noise-making equipment and sources in and near residential areas where the noise impacts would be considered intrusive to adjacent residential property, unless consistent with the right-to-farm.
>
> **PS2.5 –** An increase in average noise levels of 5 dBA or greater is considered to be significant and to constitute a noise impact by the noise source in question for the purpose of environmental analyses.

St. Helena Municipal Code

Section 8.24.010 of the Municipal Code limits construction activities which generate noise that can be heard at the property line of any parcel of real property within the city limits to between the hours of eight a.m. to five p.m. Hours for delivery of materials/equipment and cleaning and servicing of machines/equipment are limited to seven a.m. to six p.m. Exceptions to these time restrictions may be granted by the public works director for one of the following reasons: (a) inclement weather affecting work; (b) emergency work; or (c) other work, if work and equipment will not create noise that may be unreasonably offensive to neighbors as to constitute a nuisance. The city engineer must be notified and give approval in advance of such work.

IMPACT ANALYSIS

(a) **Less-Than-Significant Impact**.

Operation

The proposed Project would not generate noise during operation. Therefore, no operation-period impact would occur.

Construction

The primary noise impacts from construction of the proposed Project would occur from noise generated by the operation of construction equipment on the project site. Secondary sources of noise during construction would include increased traffic flow from the transport of workers, equipment, and materials to the project site. St. Helena Municipal Code does not have quantitative threshold for construction noise. Policy PS2.5 of the General Plan Update 2040 specifies an increase in average noise levels of 5 dBA or greater is considered to be significant and to constitute

[20] City of St. Helena, 2019. St. Helena General Plan Update 2040. June.

a noise impact by the noise source. Therefore, for this analysis, a 5-dBA increase is considered a substantial increase in ambient noise.

Noise from Construction Equipment

Construction is expected to occur between Summer 2021 and late Fall 2021. Construction noise levels would vary from day to day, depending on a number of factors, including the quantity and condition of the equipment being used, the types and duration of activity being performed, the distance between the noise source and the receptor, and the presence or absence of barriers, if any, between the noise source and receptor.

Table 1 shows typical noise levels associated with various types of construction equipment that may be used during each phase of construction. A standard approach to the assessment of construction noise is to quantify (calculate) the noise that would be generated from the two noisiest pieces of equipment expected to be used in each construction phase.[21] The combined noise levels of the two noisiest pieces of equipment have been calculated to represent the noise impact from construction. Table 6 shows construction noise levels at different distances from the noise source.

TABLE 6: Construction Noise Levels at the Nearest Noise-Sensitive Receptors

Construction Phase[1]	Equipment	Reference Noise Level at 50 Feet (dBA Leq)[2]	Addition of Two Noisiest Pieces of Equipment at 50 Feet (dBA Leq)	Noise Level at the nearest residences at 35 feet (dBA Leq)[3]	Noise Level at 500 feet (dBA Leq)[3]	Noise Level at 1,000 feet (dBA Leq)[3]
Excavation and Pipe Laying	Excavators	81	84	87	64	58
	Tractors/ Loaders/ Backhoes	80				
Trench Paving	Pavers	82	85	88	65	59
	Paving Equipment	82				
	Sweepers/ Scrubbers	72				

Notes:

1. The project also involves brush removal near Napa River, and a small amount of grubbing near the Highway 29, adjacent to a drainage. Grubbing would likely be completed with hand tools or weed wackers and no heavy construction equipment is anticipated.

2. Reference noise levels at 50 feet expressed in Leq were calculated based on the reference noise levels expressed in Lmax from FHWA Highway Construction Noise Handbook (U.S. Department of Transportation, 2006), taking into account the acoustical usage factors also from the Handbook.

3. Based on reference noise levels at 50 feet, the following propagation adjustment was applied to calculate noise levels at 35, 500, and 1,000 feet:

dBA2 = dBA1 + 10 Log10(D1/D2)^2

Where:

dBA1 is the reference noise level at a specified distance (in this case 50 feet).

dBA2 is the calculated noise level.

D1 is the reference distance (in this case 50 feet).

D2 is the distance from the equipment to the receiver.

[21] Federal Transit Administration (FTA), 2018. Transit Noise and Vibration Impact Assessment Manual, FTA Report No. 0123. September.

Source: The types of construction equipment are provided by the project applicant.

As indicated in Table 6, construction noise from both excavation and pipe laying and trench paving could have the potential to exceed ambient noise levels (about 55 dBA Ldn) by about 30 dB at the nearest noise-sensitive receptors when the equipment is operating at the closest location. However, as the equipment moves farther from the noise-sensitive receptors, construction noise would decrease. When the equipment is located about 1,000 feet from the nearest noise-sensitive receptors, construction noise levels would still exceed the ambient noise levels, but by less than 5 dBA and therefore, would not considered a substantial increase.

Construction is proposed to occur between hours of eight a.m. to five p.m., Monday through Friday, which is consistent with the requirements in the St. Helena Municipal Code, and would prevent the disturbance of sleep at the majority of the neighboring residences. Additional factors that would reduce the severity of this impact include the short-term nature of the impact. Exposure of any given receptor to levels of construction noise greater than 5 dBA over ambient would be brief because construction activity would move along the project alignment over time. More specifically, activities associated with trench paving would be completed within two days. Therefore, exposure of any given receptor to substantial construction noise during trench paving would be expected to last no more than two days. Activities associated with excavation and pipe laying would move along the project alignment at a speed of approximately 100 feet per day.[22] As discussed above, when activities associated with excavation and pipe laying are located 1,000 feet away, no substantial increase from ambient would occur. Therefore, exposure of any given receptor to substantial construction noise during excavation and pipe laying would be expected to last no more than 20 days.

Because construction hours are consistent with the requirements in the St. Helena Municipal Code and because construction-related noise impacts would be temporary and cease once construction is complete, the potential impact related to construction noise from construction equipment would be less than significant.

Noise from Increased Traffic Flow

Approximately 12,000 cubic yards of soil and 2,000 cubic yards of pavement would be hauled off-site during excavation and pipe laying, and 2,000 cubic yards of pavement would be imported to the site during trench paving. These truck trips could generate noise levels of approximately 48.9 dBA Leq during excavation and pipe laying, and approximately 54.3 dBA Leq during trench paving.[23] As discussed above, the ambient noise levels are about 55 dBA Ldn within most of the project alignment along Mills Lane, but could range from 55 to 80 dBA Ldn near Highway 29 (within the western portion of the project alignment), and range from 55 to 60 dBA Ldn near Silverado Trail South (within the eastern portion of the project alignment). Because noise from construction truck trips would be lower than the ambient noise levels, noise from increased traffic flow during construction would not increase ambient noise levels by 5 dBA, and a substantial noise increase would not occur. Therefore, the potential impact related to construction noise from increase traffic flow would be less than significant.

(b) **Less-Than-Significant Impact**. Construction activities can result in varying degrees of ground vibration, depending on the equipment, activity, and soil conditions. Table 7 summarizes the vibration criteria to prevent disturbance of residences adjacent to the project site. In the analysis below, the "occasional events" criterion of 75 VdB is applied for construction equipment. Table 8 summarizes the vibration criteria to prevent damage to structures. The vibration criterion of 0.2 in/sec for non-engineered timber and masonry buildings is selected to conservatively represent

[22] Dower Becky, Project Manager at BKF Engineers, 2021. Email correspondence with Geoff Reilly at WRA. April 13.

[23] Hourly construction truck trips were calculated by dividing the total haul trips during grading by the total work hours during each phase, assuming an 8-hour work day. FHWA TNM Version 2.5 model was used for these results.

the building types adjacent to and near the project site.

TABLE 7: Vibration Criteria to Prevent Disturbance – RMS (Vdb)

Land Use Category	Frequent Events[a]	Occasional Events[b]	Infrequent Events[c]
Residences and buildings where people normally sleep	72	75	80

Notes:
a More than 70 vibration events of the same kind per day or vibration generated by a long freight train.
b Between 30 and 70 vibration events of the same kind per day.
c Fewer than 30 vibration events of the same kind per day
Source: Federal Transit Administration, 2018. Transit Noise and Vibration Impact Assessment Manual. FTA Report No.0123, September.

TABLE 8: Vibration Criteria to Prevent Damage to Structures

Building Category	PPV (in/sec)
Reinforced-concrete, steel or timber (no plaster)	0.5
Engineered concrete and masonry (no plaster)	0.3
Non-engineered timber and masonry buildings	0.2
Buildings extremely susceptible to vibration damage	0.12

Source: Federal Transit Administration, 2018. Transit Noise and Vibration Impact Assessment Manual. FTA Report No.0123, September.

The reference vibration levels at 25 feet away from the construction equipment that could be used at the project site are summarized in Table 4. Although Table 9 provides one vibration level for each piece of equipment, it should be noted that there is considerable variation in reported ground vibration levels from construction activities, primarily due to variation in soil characteristics. Table 9 also shows the calculated vibration levels at 35 feet, where the closest residences are located.

TABLE 9: Reference and Calculated Vibration Levels for Construction Equipment

		At 25 Feet		At 35 Feet	
Construction Phase[1]	**Equipment[2]**	**PPV (in/sec)**	**RMS (VdB)**	**PPV (in/sec)[3]**	**RMS (VdB)[4]**
Excavation and Pipe Laying	Excavators	0.089	87	0.05	83
	Tractors/Loaders/Backhoes	0.076	86	0.05	82
Trench Paving	Pavers and Paving Equipment	0.21	94	0.13	90

Notes:
1.The project also involves brush removal near Napa River, and a small amount of grubbing near the Highway 29, adjacent to a drainage. Grubbing would likely be completed with hand tools or weed wackers and no heavy construction equipment is anticipated.
2. Because an excavator is an earth moving machinery, the vibration level is estimated to be similar to a large bulldozer. The vibration levels created by the normal movement of vehicle, including loaders and backhoes are of the same order-of-magnitude as the ground-borne vibration created by heavy vehicles traveling on streets and highways. Therefore, vibration levels from these equipment are estimated to be similar to loaded trucks. Vibration levels for a paver are estimated to be similar to vibratory rollers. Sweepers and scrubbers are not anticipated to generate perceptible vibration levels and therefore are not included in the table.
3. Based on vibration levels at 25 feet, the following propagation adjustment was applied to calculate vibration levels at 35 feet:
PPV2 = PPV1 x (D1/D2)^1.5
Where: PPV1 is the reference vibration level at a specified distance.
PPV2 is the calculated vibration level.
D1 is the reference distance (in this case 25 feet).
D2 is the distance from the equipment to the receiver (in this case 35 feet).
4. Based on vibration levels at 25 feet, the following propagation adjustment was applied to calculate vibration levels at 35 feet.
RMS2 = RMS1 – 30 Log10 (D2/D1)
Where: RMS1is the reference vibration level at a specified distance.
RMS2 is the calculated vibration level.
D1 is the reference distance (in this case 25 feet).
D2 is the distance from the equipment to the receiver (in this case 35 feet).
Source: PPV and RMS vibration levels at 25 feet from the FTA (2018) Transit Noise and Vibration Impact Assessment.

As shown in Table 9, all of the equipment could generate vibration levels that exceed the 75-VdB threshold and cause disturbance to the closest residences. However, construction is proposed to occur between hours of eight a.m. to five p.m., Monday through Friday and restricting work to these hours would prevent the disturbance of sleep at the majority of the neighboring residences. In addition, exposure of any given receptor to excessive vibration would be brief because construction activity would move along the project alignment over time. More specifically, activities associated with trench paving would be completed within two days. Activities associated with excavation and pipe laying would move along the project alignment at a speed of approximately 100 feet per day. Based on the short-term nature of the potential disturbance, this impact would be less than significant.

None of the equipment in Table 9 would generate vibration levels that exceed the 0.2-in/sec threshold for cosmetic damage to occur. Therefore, construction activities would not generate vibration with the potential to cause cosmetic damage to buildings.

(c) **No Impact**. The proposed Project would not introduce new residents or users to the project site. Therefore, the proposed Project would not expose people in the Project site to excessive noise from any public use airport or private airstrip.

POPULATION AND HOUSING	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
Would the project:				
a) Induce substantial unplanned 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)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Environmental Setting

A project would be considered growth-inducing if it were to provide new housing, new employment, or expand existing infrastructure not planned for by a local plan. The proposed Project entails construction of a new storm drain that is linearly set along Mills Lane and a dirt road extending past the eastern terminus of Mills Lane. There is no population that will be displaced.

As described in the City's Storm Drain Master Plan, the proposed outfall in the Napa River is planned to serve the Project area. Construction of the new storm drain in Mills Lane and outfall in the Napa River has been undertaken by the City, and is consistent with the Highway 29 Specific Plan and the St. Helena Storm Drain Master Plan.

Regulatory Setting

St. Helena General Plan Update 2040

LU1.1 – Require new development to occur within well-defined boundaries and be consistent with the ability to provide urban services. New development should mitigate infrastructure impacts by using sustainable, best management practices in green building and stormwater management and paying its share of development impact fees, while minimizing impacts on sewer, water, energy, and natural resources.

LU1.2 – Allow urban development to occur only within the Urban Limit Line. Consider an exception for on-site employee housing on Agricultural lands. Urban services, such as sewer, water, and storm drainage, will only be extended to development within the Urban Limit Line.

LU1.4 – In order to minimize and postpone the need for expansion of the Urban Limit Line, encourage infill development within currently developed areas.

LU1.5 – Require new development to provide adequate infrastructure and urban services, including compliance with the policies and implementing actions affecting new development as set forth in the Public Facilities and Services Element.

LU1.6 – Support the redevelopment of vacant and underutilized sites within the downtown area with mixed-use development opportunities. Encouraging infill development with a mix of uses will support a pedestrian- oriented, vibrant retail and commercial district that is centrally located and easily accessible to residents and neighborhoods.

2015-2023 Housing Element

The 2015 City of St Helena's Housing element provides the following applicable overall goal:

Make efficient use of land within the Urban Limit Line to protect agricultural lands, promoting compact, well- designed developments that 'fit in' with existing neighborhoods and contribute to the overall livability of our community. Encourage a balance of housing types throughout the entire community.

Highway 29 Specific Plan

The Highway 29 Specific Plan provides for the "orderly build out of land uses as envisioned in the St. Helena General Plan and allowed by the St. Helena Zoning Ordinance". Land use objectives which apply to the site include:

- Provide for the logical extension of service commercial and light industrial uses and other land uses permitted and conditionally permitted in the St. Helena Zoning Ordinance.
- Provide for growth that is local-serving and pedestrian-scaled service commercial and light industrial opportunities on vacant land within the Specific Plan area. Where feasible, promote development of housing in the Specific Plan area.

IMPACT ANALYSIS

(a) **Less-Than-Significant Impact.** As described in the City's Storm Drain Master Plan, the proposed outfall in the Napa River is planned to serve the Project area. Construction of the new storm drain in Mills Lane and outfall in the Napa River is consistent with the Highway 29 Specific Plan and the St. Helena Storm Drain Master Plan. Given that the proposed Project was anticipated in the Highway 29 Specific Plan and the St. Helena Storm Drain Master Plan, the Project would not induce substantial unplanned growth either directly or indirectly, and impacts would be less than significant.

(b) **No Impact.** The Project entails the installation a new storm drain that is linearly set along Mills Lane and a dirt road extending past the eastern terminus of Mills Lane. The Project footprint is contained entirely within the alignment of Mills Lane and the dirt road extending past the eastern terminus of Mills Lane. No people or houses would be displaced and there would be no need for replacement housing. The Project would have no impact in relation to this issue.

MITIGATION MEASURES

None required.

SOURCES

- City of St. Helena General Plan Update 2040; Adopted May 14, 2019.
- City of St. Helena, Highway 29 Specific Plan, February 22, 2005.
- City of St. Helena Fee schedule.

PUBLIC SERVICES	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
Would the project:				
a) 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 any of the public services:				
i. Fire Protection?	☐	☐	☐	☒
ii. Police Protection?	☐	☐	☐	☒
iii. Schools?	☐	☐	☐	☒
iv. Parks?	☐	☐	☐	☒
v. Other public facilities?	☐	☐	☐	☒

ENVIRONMENTAL SETTING

The City of St. Helena is well served by established public services including fire and police protection, schools and parklands. In order to offset the cost of improving or expanding City services to accommodate the demand generated by new development the City charges one-time impact fees on new private development. Development impact fees are necessary in order to finance required public service improvements and to pay for new development's fair share of the costs necessary to maintain acceptable levels of service related to fire and police protection services, open space, parkland and other such public services.

Fire Protection

The City of St. Helena Fire Department provides fire protection services within the City limits and certain surrounding unincorporated areas, pursuant to a mutual aid agreement between the City and the County of Napa. The Fire Department is based at 1480 Main Street in St. Helena. The department has set a goal for a maximum response time of 8 minutes within the St. Helena city limits.

Police Protection

The Police Department is based at 1480 Main Street in St. Helena. The St. Helena Police Department provides police

services within the city limits. The Police Department goal is to maintain a staffing ratio of two police officers for every 1,000 residents. The Police Department's goal is to maintain an average response time of three minutes or less. In recent years, the number of calls for service has increased, resulting in an increase in response time.

Schools

The St. Helena Unified School District maintains four schools: a primary school, an elementary school, a middle school, and a high school that serve approximately 1,200 students in grades K–12. There are also four private schools in the city, as well as a public preschool (Little Backpacks Preschool) and a public college (Napa Valley College).

Parks

The City of St. Helena Parks Division of the Public Works Department is responsible for management of parks in the St. Helena area, which includes 12 parks and recreation facilities, four pathways, street trees, benches, and parking lots. Jacob Meily Park, Wappo Park & Wappo Dog Park, and Crane Park are the closest recreational facilities to the Project site; Jacob Meily Park is located approximately 0.38 miles northwest of the Project site, Wappo Park & Wappo Dog Park is located approximately 0.32 miles northwest of the Project site and Crane Park is located approximately 0.31 miles southwest of the Project site.

IMPACT ANALYSIS

(ai-v) **No Impact.** The proposed Project entails installation of storm drain improvements along the entirety of Mills Lane and approximately 600-feet east of the terminus of Mills Lane into the Napa River. The proposed Project would not involve the construction of any additional housing, infrastructure, or employment centers that may induce population growth. There would therefore not be any permanent increase in demand by the general public for fire protection, police protection, schools, parks, or other public facilities. There could be a temporary, minimal increase in demand for fire or police services to accommodate construction activities. Any such increase would be limited to the six-month construction period and would be insufficient in scope and duration to necessitate new facilities. As no fire or police protection, school, park, or other public facilities are proposed and no increase in the need for such facilities would occur, there would be no impact.

MITIGATION MEASURES

None required.

SOURCES

- City of St. Helena General Plan Update 2040; Adopted May 14, 2019.
- City of St. Helena website: http://www.cityofsthelena.org/.
- City of St. Helena Fee Schedule.
- City of St. Helena School District Fee Schedule.
- City of St. Helena, Highway 29 Specific Plan, February 22, 2005.

RECREATION	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Would the project 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?	☐	☐	☐	☒
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

ENVIRONMENTAL SETTING

The City of St. Helena Parks Division of the Public Works Department is responsible for management of parks in the St. Helena area, which includes 12 parks and recreation facilities, four pathways, street trees, benches, and parking lots. Jacob Meily Park, Wappo Park & Wappo Dog Park, and Crane Park are the closest recreational facilities to the Project site; Jacob Meily Park is located approximately 0.38 miles northwest of the Project site, Wappo Park & Wappo Dog Park is located approximately 0.32 miles northwest of the Project site and Crane Park is located approximately 0.31 miles southwest of the Project site.

REGULATORY SETTING

St. Helena General Plan Update 2040

PR1.1 – Retain the park standard from the 1993 General Plan of 5.0 acres of parkland per 1,000 residents, while striving for the nationally recommended standard of 10.5 acres per 1,000 residents.

PR1.2 – Enhance the community's quality of life and ensure a widely accessible environment through the provision of a citywide system of parks and open spaces. Identify and develop linkages, corridors, and other connections to provide an aesthetically pleasing and functional network of parks, open space areas, and bike paths throughout the city.

PR1.3 – Identify park land opportunity sites to ensure that the City can meet and possibly exceed its parkland standard of 5.0 acres per 1,000 residents. Locate new parks to ensure that City park facilities are equitably distributed throughout all areas of the city and residents of all ages can access them safely and conveniently.

PR1.4 – Require park land dedications or civic improvement fees on all new residential, commercial, and industrial developments to meet the standard of 5.0 acres of parks per 1,000 residents.

PR1.5 – Ensure adequate funding to acquire new park lands as they become available.

PR1.6 – Develop new parks only after existing parks have received adequate funding and maintenance.

PR1.E – Develop a comprehensive network of bicycle and pedestrian trails that links the City's parks and enhances bicycle and pedestrian connectivity throughout the city and the region.

IMPACT ANALYSIS

(a-b) **No Impact**. The Proposed Project would not result in population growth that would increase the use of regional parks and other recreational facilities or require the construction or expansion of

recreational facilities that might have an adverse physical effect on the environment. The proposed Project consists of installation of a new storm drain infrastructure along Mills Lane, which is a City street for most of its length, from its intersection with State Highway 29 east to the Napa River. The storm drain will discharge to the west bank of the Napa river approximately 600 feet east of the terminus of Mills Lane. Construction activities would be limited to a short-term duration and would not impede the use of existing access points to any City parks. As a result, no recreational facilities—existing or new—are required to serve the Project, thus no impacts are anticipated under this issue.

MITIGATION MEASURES

None required.

SOURCES

- City of St. Helena General Plan Update 2040; Adopted May 14, 2019.
- City of St. Helena Park Sites: https://www.cityofsthelena.org/parksites
- City of St. Helena Fee Schedule.

TRANSPORTATION	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐

ENVIRONMENTAL SETTING

The City of St. Helena lies on a north-west/south-east axis, with SR 29 serving as the main route for intercity and regional travel. SR-29 is classified as a Regional Connector by the City General Plan. SR 29 is a two- to four-lane rural highway that stretches through Napa County from Vallejo at Napa County's southern border to Lake County in the north. Within the City of St. Helena, SR 29 is confined to two travel lanes. Since SR 29 is a major north-south thoroughfare for Napa County, heavy through traffic is typical along Main Street. The street network to the west of SR 29 is a grid pattern of residential blocks connected to SR 29 by a series of east-west streets connecting residential areas. To the east of SR 29, the grid network is discontinuous due to the lack of parallel facilities to SR 29 to connect the east-west roadways.

Mills Lane

Mills Lane is a narrow two-way east-west street on the east side of Main Street Mills Lane has a 14-foot wide cross section. Two-way traffic flow is possible by slow-moving vehicles, but it requiresone or both drivers to partially pull off to the gravel and grass shoulders. It provides access to vineyards and intermittent residences. There are no curbs, gutters, sidewalks or paved shoulders, but grass and gravel shoulders are in place. Mills Lane is stop sign controlled on its approach to SR 29 and the posted speed limit is 25 miles per hour. Mills Lane also has about a 20-foot-wide at-gradecrossing of the Napa Valley Wine Train single track about 20 feet from the east edge of SR 29. The crossing is marked with a crossbuck. The intersection of Mills Lane and Main Street is controlled by a stop sign with traffic on Mills Lane required to stop before entering the intersection. There is a two-way left-tum lane on Main Street that accommodates southbound left turns to Mills Lane. Land uses along Mills Lane include a vineyard on the north side of the street and undeveloped land on the south side of the street.

There are no bicycle pathways/routes in the immediate vicinity of the Project site. There are no pedestrian facilities within the vicinity of the Project site. There is no public transportation which services the Project site.

The proposed Project would involve the temporary use of existing roadways by construction workers and construction equipment in order to access the Project site. Construction traffic would primarily use SR 29 to access the Project site. Post-Project there would be no perceptible difference to the surrounding environment. All forms of circulations would occur in the same manner as present.

Bike and Pedestrian Facilities

The St. Helena Bicycle Plan was developed as a component of the Napa County Transportation Authority's Countywide Bicycle Plan Update. The Plan is intended to guide and influence the development of bikeways, bicycle policies, bicycle programs and bicycle facility design standards to make bicycling throughout St. Helena and Napa County more safe, comfortable, convenient and enjoyable for all bicyclists. The overarching goal of the Bicycle Plan is to increase the number of persons who bicycle throughout St. Helena and Napa County for transportation to work, school, utilitarian purposes, and recreation.

There are no Class I bicycle paths, signed and striped Class II bicycle lanes, or signed Class III bike routes in the Project vicinity. In the vicinity of the Project site, a Class II Bike Lane is proposed along Mills Lane. SR 29 in the vicinity of the Project site is an existing Primary Class II Bike Route and is proposed to have a Class II Bike Lane. A Class I Multi-Use Path is also proposed adjacent to, and east of SR 29.

Public Transit

The St. Helena Shuttle is an on-demand shuttle service available for a nominal fee. Service is generally available Monday through Friday 7:00 am to 9:00 pm, Friday and Saturday 7:00 am to 11:00 pm, and Sunday (May through November) 11:00 am to 9:00 pm. *VINE Go* is an "origin to destination", shared ride service which provides demand response for persons with disabilities in the cities of Calistoga, St. Helena, Napa, American Canyon, the Town of Yountville and the unincorporated areas of Napa County. *VINE Go* is the ADA paratransit service complementary to the fixed route operators and runs at times corresponding to the fixed routes.

REGULATORY SETTING

Regional Transportation Planning

The Metropolitan Transportation Commission (MTC) is the transportation planning, coordinating, and financing agency for the nine-county San Francisco Bay Area, including Napa County. MTC is charged with regularly updating the Regional Transportation Plan, a comprehensive blueprint for the development of mass transit, highway, airport, seaport, railroad, bicycle, and pedestrian facilities in the region. MTC and ABAG adopted Plan Bay Area 2040 in July 2017, which includes the region's Sustainable Communities Strategy (integrating transportation, land use, and housing to meet GHG reduction targets set by CARB) and Regional Transportation Plan (including a regional transportation investment strategy for revenues from federal, state, regional and local sources over the next 24 years).

Senate Bill 743

Senate Bill 743 (SB 743) was signed in 2013 and requires that vehicle miles traveled (VMT) per capita, employee, or net VMT be used to analyze transportation impacts of land use projects under CEQA instead of reduction in levels of service. In 2018, the CEQA Guidelines were updated to include Section 15064.3, which implements SB 743 and requires lead agencies to select a VMT methodology, choose significance thresholds, and determine feasible mitigation measures. Section 15064.3 will become effective statewide in July 2020. VMT should be reduced to minimize the transportation impact a development has on a community. The goal of SB 743 is to encourage development that reduces VMT.

With the passage of SB 743 amending CEQA's evaluation of transportation impacts and the December 28, 2018 effective date of the Guidelines implementing SB 743, the effect of a project on LOS shall no longer be considered an impact on the environment. However, as allowed by CEQA Guidelines Section 15064.3, subdivision (c), lead agencies have until July 2020 to start using VMT. Neither the County nor the City of St. Helena has yet developed any guidelines or significance criteria for this type of evaluation.

Highway 29 Specific Plan

The proposed Project site is located within the Specific Plan area on Mills Lane. The east side of the plan area encompasses Dowdell Lane from Main Street extending east of La Fata Street. The plan area then extends north past Mills Lane before extending west back to Main Street. On the west side of Main Street, the plan area extends along Grayson Avenue from Main Street west to Crane Avenue before extending north along Sulphur Creek and back to Main Street.
One of the prime circulation objectives of the Plan is to "Improve circulation and access for the easterly portion of the Specific Plan area through upgrading existing roads and providing for the installation of new traffic signals at the intersection of Highway 29/Grayson Avenue/Mills Lane and the intersection of Highway 29/Dowdell Lane." Specific components of Plan include the following:

- A traffic signal at Highway 29 and Grayson Avenue for any new development on both the east and west sides of Highway 29 (completed);
- A traffic signal at Highway 29 and Dowdell Lane for any new development on the east side of Highway 29; and
- Realignment of Mills Lane (south to Grayson Avenue), for any new development on the east side of Highway 29.

As part of the above circulation improvements, additional right-of-way and turn lanes would be required as follows:

- Installation of a traffic signal at the reconfigured intersection (Highway 29/Grayson Avenue/Mills Lane) constructed to Caltrans standards that will include a westbound (northbound) left-turn lane onto Grayson Avenue (partially completed);
- Installation of a northbound right-turn lane from Highway 29 onto realigned Mills Lane to minimize back-up of turning vehicle on Highway 29;
- Installation of acceleration and deceleration lanes at the intersection of Highway 29 and Mills Lane. This will require acquisition of additional right-of-way at the intersection to accommodate these new lanes.

IMPACT ANALYSIS

(a) **Less-Than-Significant Impact.** The Proposed Project is not considered a trip generating Project. However, construction would result in a short-term increase in traffic levels on Project area roadways. Construction vehicles and equipment expected to be used include, but are not limited to, worker vehicles, vendor trucks, and haul trucks legally loaded trucks. The proposed Project will require the installation of a storm drain mostly within existing road rights-of-way. The roadway within which the storm drain will be installed, Mills Lane, is not a major roadway that is important to circulation in the area. Operation of proposed Project is not anticipated to increase traffic. Additional trips would not be added to the roadway network. The Project is not expected to create any disruptions or inconsistencies with existing pedestrian facilities or plans. There are no curbs, gutters, sidewalks or paved shoulders on Mills Lane, but grass and gravel shoulders are in place, thus indicating the lack of pedestrian facilities. The Project is not expected to add trips to any existing transit services. There are no Class I bicycle paths, signed and striped Class II bicycle lanes, or signed Class III bike routes in the Project vicinity. Therefore, the Project would have a less than significant impact to pedestrian, bicycle, and transit facilities.

(b) **Less-Than-Significant Impact.** In September 2013, the Governor's Office signed Senate Bill (SB) 743 into law, starting a process that fundamentally changes the way transportation impact analyses are conducted under CEQA. In response to the passage of SB 743, the Governor's Office of Planning and Research (OPR) was required to amend the CEQA Guidelines to provide a new approach to evaluating traffic impacts. These changes include the elimination of auto delay, level of service, and similar measurements of vehicular roadway capacity and traffic congestion as the basis for

determining significant impacts. The mandate of SB 743 was to devise an alternative traffic impact evaluation criterion that would promote the reduction of GHG emissions as well as foster the development of multi-modal transportation networks and a diversity of land uses. SB 743 further suggested that a measurement such as vehicle miles traveled (VMT) would be an appropriate method to evaluate traffic impacts (§15064.3). VMT is defined as a measurement of miles traveled by vehicles within a specified region and for a specified time period. VMTs are calculated based on individual vehicle trips generated and their associated trip lengths. Jurisdictions have until July 2020 to finalize and adopt significance thresholds in relation to VMT.

The Project entails the installation of storm drain improvements and with the exception of construction-related traffic during the approximate two-month construction period and any regular or emergency maintenance, there is no traffic associated with the Project. According to the construction information provided by the Project applicant, there would be 4 workers per day during the approximate two-month construction period. Thus, no further analysis of traffic generation was quantitatively conducted. Furthermore, the proposed Project would not generate a significant number of trips once in operation. As such, development of the Project is not anticipated to result in a significant impact related to vehicle miles travelled, and thus would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). Impacts under this issue are considered less than significant.

(c) **Less-Than-Significant Impact**. Construction of the proposed Project would not alter the design of existing roadways or change existing land uses. Once the improvements are installed the Project site would be repaved and returned to its current condition. Therefore, the proposed Project would not substantially increase hazards due to a geometric design feature or incompatible uses. Impacts would be less than significant.

(d) **Less-Than-Significant Impact.** Construction would occur over a period of approximately two months at the Project site. During construction, full lane closures on local roadways would not occur; therefore, construction activities would not impede emergency vehicles. The proposed Project will require closure of parts of Mills Lane within the roadway in which the storm drain alignment is installed. This effort will occur within existing rights-of-way within Mills Lane. During construction, a potential exists for short-term hazards and constraints on both normal and emergency access within the affected area, especially due to the construction of the proposed pipeline alignment, as it will require partial lane closure within existing rights-of-way. There are no emergency access roadways located within the Project footprint. However, adequate emergency access will be provided along these routes throughout construction. Thus, impacts would be less than significant.

MITIGATION MEASURES

None required.

SOURCES

- City of St. Helena General Plan Update 2040; Adopted May 14, 2019.
- City of St. Helena Highway 29 Specific Plan, Adopted February 22, 2005.

TRIBAL CULTURAL RESOURCES	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
Would the project:				
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 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:				
i. 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	☐	☒	☐	☐
ii. 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 § 5024.1. In applying the criteria set forth in subdivision(c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

This section examines the potential impacts of the proposed Project on tribal cultural resources based upon an Archaeological Survey Report (ASR) prepared by Alta Archaeological Consultants (ALTA) in March 2021. The report contains sensitive cultural and tribal cultural resources information and is available for review upon request to qualified individuals only. The ASR includes information from a cultural resource inventory that was conducted by ALTA to satisfy the requirements of CEQA, as codified in Public Resource Code sections 5097, and its implementing guidelines 21082 and 21083.2.

The ASR concluded that the Project will not cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either 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.

The ASR included an assessment of the Project area to contain buried archaeological resources that determined the Project area to be highly likely to contain buried archaeological resources. Given the positive survey findings and the

high probability of the Project to encounter buried archaeological resources a program of subsurface archaeological trenching was conducted. A backhoe was used to excavate a series of trenches along the proposed pipeline route. Following the archaeological trenching, ALTA prepared a Report of Subsurface Exploratory Archaeological Trenching (letter report) on June 25, 2021 that documents the results of subsurface archaeological exploration within the Project area and provides management recommendations to ensure that cultural and tribal cultural resources are not adversely affected by the proposed Project.

Contacts with the local tribes as well as the Office of Historic reservation were initiated as part of the cultural and tribal resources review. No tribes responded with any concerns. The sites are not identified in any state archival documentation.

ENVIRONMENTAL SETTING

Assembly Bill 52, which went into effect in July 2015, is an amendment to CEQA Section 5097.94 of the Public Resources Code. AB52 established a consultation process with all California Native American tribes identified by the Native American Heritage Commission (NAHC) with cultural ties to an area and created a new class of resources under CEQA known as Tribal Cultural Resource. The City of Saint Helena, as the Lead Agency under CEQA, is responsible for complying with the requirements of CEQA Section 5097.94 of the Public Resources Code.

The Native American Heritage Commission (NAHC) was contacted on December 2, 2020 to review the Sacred Lands Files for any resources present within the project area and to request the contact information for the Native American groups in the area. In the NAHC response dated December 11, 2020, Sarah Fonseca (Cultural Resources Analyst) indicated that a search of the Sacred Lands File showed positive results and recommended the lead agencies to be aware that NAHC and CHRIS records searches are not necessarily indicative of negative results on the ground. The NAHC provided a list of contacts who may have additional information regarding tribal resources for this area. A letter requesting information regarding the project area was sent to each contact listed by the NAHC. No response has been received to date. As planning proceeds, the City of Saint Helena, as Lead Agency under CEQA, is the entity responsible for consulting with Native American representatives as needed.

REGULATORY SETTING

California Environmental Quality Act

CEQA (codified at PRC § 21000 *et seq*.) is the principal statute governing environmental review of projects occurring in the State. CEQA requires lead agencies to determine if a project would have a significant effect on historical resources, unique archaeological resources, or tribal cultural resources.

The State implements provisions in CEQA through its statewide comprehensive cultural resources surveys and preservation programs. Typically, a resource must be more than 50 years old to be considered as a potential historical resource. The State of California Office of Historic Preservation advises recordation of any resource 45 years or older, since there is commonly a five-year lag between resource identification and the date that planning decisions are made.

Assembly Bill 52 and Tribal Cultural Resources

Impacts to tribal cultural resources also are considered under CEQA (PRC § 21084.2, also see Assembly Bill [AB] 52). Under CEQA, a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment (PRC § 21084.2). PRC § 21074(a) defines a tribal cultural resource as any of the following:

- Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
  - included or determined to be eligible for inclusion in the California Register; or
  - included in a local register of historical resources, as defined in PRC § 5020.1(k).
- 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 [PRC] § 5024.1. In applying these criteria, the lead agency would consider the significance of the resource to a California Native American tribe.

A cultural landscape that meets the criteria of PRC § 21074(a) is also a tribal cultural resource if the landscape is geographically defined in terms of the size and scope. A historical resource as described in PRC § 21084.1, a unique archaeological resource as defined in PRC § 21083.2, or a non-unique archaeological resource as defined in PRC § 21083.2 may also be a tribal cultural resource under CEQA if it meets the criteria identified in PRC § 21074(a).

AB 52 requires CEQA lead agencies to analyze the impacts of projects on tribal cultural resources separately from impacts on archaeological resources (PRC § 21074 and 21083.09) because archaeological resources have cultural values beyond their ability to yield data important to prehistory or history. AB 52 also defines tribal cultural resources in a new section of the PRC (§ 21074; see above). Lead agencies must engage in additional consultation with California Native American Tribes (PRC § 21080.3.1, 21080.3.2, and 21082.3).

To determine potential impacts on tribal cultural resources, a project's lead CEQA agency is required to conduct formal consultation with relevant California Native American Tribes who have requested that the lead agency inform them of proposed projects in the geographic area that is traditionally and culturally affiliated with the tribe. When such consultation is conducted, the notification of the project shall be in writing and sent within 14 days of determining that an application for a project is complete or a decision by a public agency to undertake a project, and Native American Tribe recipients shall have 30 days from receipt of the formal notification to request consultation (PRC § 21080.3.1 and 21080.3.2).

CEQA requires that such consultation include project alternatives, mitigation measures, or significant effects, if requested by a California Native American Tribe, and that consultation will be considered concluded when either the parties agree to measures to mitigate or avoid a significant effect, or the agency concludes that mutual agreement cannot be reached concerning appropriate measures to be taken that would mitigate or avoid a significant effect. Any such measures shall be recommended for inclusion in the environmental document and adopted mitigation monitoring program if determined to avoid or lessen a significant impact on a tribal cultural resource, and if it is determined that a project may have a significant impact on a tribal cultural resource the environmental document would be required to discuss whether the project has a significant impact on an identified tribal cultural resource and whether feasible alternatives or mitigation measures avoid or substantially lessen the impact on the identified tribal cultural resource (PRC § 21080.3.2).

The following examples of mitigation for potential impacts on tribal cultural resources are included in CEQA (PRC § 21084.3):

- Avoidance and preservation of the resources in place, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
- Treating the resource with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
    - Protecting the cultural character and integrity of the resource.
    - Protecting the traditional use of the resource.
    - Protecting the confidentiality of the resource.
- Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
- Protecting the resource.

CEQA states that the preference will be for avoiding damaging effects to tribal cultural resources (PRC § 21084.3[a]).

In accordance with AB 52, a summary of the proposed Project was mailed to the following local tribes on August 4, 2020:

- Mishewal Wappo Tribe of Alexander Valley

No response was received from the Mishewal Wappo Tribe of Alexander Valley and no other Tribes requested

consultation under AB 52.

California Register of Historical Resources

The California Register is "an authoritative listing and guide to be used by State and local agencies, private groups, and citizens in identifying the existing historical resources of the State and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change" (PRC § 5024.1[a]). The criteria for eligibility for the California Register are based upon the criteria for listing on the National Register of Historic Places (National Register) (PRC § 5024.1[b]). Certain resources are determined by the statute to be automatically included in the California Register, including California properties formally determined eligible for, or listed in, the National Register.

To be eligible for the California Register, a cultural resource must be significant at the local, State, and/or federal level under one or more of the following four criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. Is associated with the lives of persons important in our past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. Has yielded, or may be likely to yield, information important in prehistory or history.

A resource eligible for the California Register must be of sufficient age and retain enough of its historic character or appearance (integrity) to convey the reason for its significance. Additionally, the California Register consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The California Register automatically includes the following:

- California properties listed on the National Register and those formally Determined Eligible for the National Register;
- California Registered Historical Landmarks from No. 770 onward; and
- Those California Points of Historical Interest that have been evaluated by the OHP and have been recommended to the State Historical Commission for inclusion on the California Register.

Other resources that may be nominated to the California Register include:

- Historical resources with a significance rating of Category 3 through 5 (those properties identified as eligible for listing in the National Register, the California Register, and/or a local jurisdiction register);
- Individual historic resources;
- Historic resources contributing to historic districts; and
- Historic resources designated or listed as local landmarks, or designated under any local ordinance, such as an historic preservation overlay zone.

<u>California Public Resources Code § 5097</u>

PRC § 5097.99, as amended, states that no person shall obtain or possess any Native American artifacts or human remains that are taken from a Native American grave or cairn. Any person who knowingly or willfully obtains or possesses any Native American artifacts or human remains is guilty of a felony, which is punishable by imprisonment. Any person who removes, without authority of law, any such items with an intent to sell or dissect or with malice or wantonness is also guilty of a felony which is punishable by imprisonment.

<u>California Native American Historic Resource Protection Act</u>

The California Native American Historic Resources Protection Act of 2002 imposes civil penalties, including imprisonment and fines up to $50,000 per violation, for persons who unlawfully and maliciously excavates upon, removes, destroys, injures, or defaces a Native American historic, cultural, or sacred site that is listed or may be listed in the California Register.

California Health and Safety Code § 7050.5

Section 7050.5 of the California Health and Safety Code (HSC) protects human remains by prohibiting the disinterring, disturbing, or removing of human remains from any location other than a dedicated cemetery. PRC § 5097.98 (and reiterated in PRC § 15064.59[e]) also identifies steps to follow in the event of the accidental discovery or recognition of any human remains in any location other than a dedicated cemetery.

ST. Helena General Plan Update 2040

The following General Plan policies are related to Tribal Cultural Resources:

HR1.5 – For development and redevelopment proposals in archaeologically and paleontologically sensitive areas of St. Helena or where tribal cultural resources are known to exist, require an assessment of the potential presence of archaeological, paleontological and tribal cultural resources, including a site survey and a records search of the California Historical Resources Information System at the Northwest Information Center (NWIC). As warranted by the results of the assessment, require additional studies to identify and address project-specific impacts on archaeological and paleontological resources. The City shall incorporate the study recommendations as project conditions of approval to ensure that impacts on archaeological and/or paleontological resources are mitigated to the extent possible. Studies shall be prepared according to National Register Bulletin 24: Guidelines for Local Surveys: A Basis for Preservation Planning and the Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation.

HR2.1 – Strengthen public awareness of and support for the preservation and protection of the City's historic resources, while improving community access to information about local Native American history.

HR2.2 – In cooperation with Native American Research and Historical Preservation Society, improve community access to information about Native American life.

IMPACT ANALYSIS

(a-b) **Less Than Significant with Mitigation Incorporated.** According to the ASR, the Project will not cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either 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. No Native American groups responded with concerns as to the site's cultural significance. Although the proposed Project is not anticipated to impact any tribal cultural resources, the Project involves ground-disturbing activities that may uncover previously unrecorded archaeological deposits, including human remains. Implementation of Mitigation Measures CULT-1 through CULT-5 listed below would reduce potential impacts to tribal cultural resources to a less-than-significant level.

MITIGATION MEASURES

Mitigation Measure CULT-1: Conduct Archaeological Monitoring During Construction

A qualified professional archaeologist meeting the Professional Qualifications Standards defined in the Secretary of the Interior's Standards and Guidelines (36 CFR 61) will conduct on-site monitoring during any ground disturbing activities within the project area, and will inspect all excavation spoils, and visible trench profiles for the presence of intact archaeological remains or deposits. Samples of excavated soil will be passed through archaeological screens and examined for the presence of artifacts and archaeological remains. The responsibility of the archaeological monitor includes inspecting, documenting, and describing any cultural materials identified during construction. Archaeological monitors are responsible for communicating with construction personnel if potentially significant cultural resources are identified. Archaeological monitors shall temporarily halt construction activities if it is likely that those activities have the potential to disturb significant or potentially significant archaeological remains. If cultural resources are identified, the monitor, in consultation with the Native American monitor (if present), shall follow the process outlined below for treatment.

Mitigation Measure CULT-2: Unanticipated Discovery of Cultural Resources

If previously unidentified cultural resources are encountered during Project implementation, avoid altering the materials and their stratigraphic context. A qualified professional archaeologist shall be contacted to evaluate the situation. Project personnel shall not collect cultural resources. Prehistoric resources include, but are not limited to, chert or obsidian flakes, projectile points, mortars, pestles, and dark friable soil containing shell and bone dietary debris, heat-affected rock, or human burials. Historic resources include stone or abode foundations or walls; structures and remains with square nails; and refuse deposits or bottle dumps, often located in old wells or privies

Mitigation Measure CULT-3: Cultural Resource Evaluation

The potential significance of the Project sites is directly tied to the ability of each cultural resource to address local and regional research questions. Surface testing and controlled subsurface excavation will be used to define the areal extent and depth of the cultural deposit(s), the types, kinds, and quantity of artifactual materials present, the chronological age of the resource(s), identify any single component areas, address overall site integrity, determine the eligibility of the site(s), and assess the impacts to the resource(s) by the Project. Testing will indicate whether the Project site(s) are significant and potentially eligible for inclusion on the CRHR.

Mitigation Measure CULT-4: Mitigation of Adverse Effects

If archaeological resources are present that are determined to qualify as a historical resource or unique archaeological resource and cannot be avoided, then the adverse effects to the resource will be mitigated through an archaeological data recovery program (ADRP). The scope of the ADRP shall be consistent with the recommendations for data recovery programs outlined in the San Francisco-Bay Delta Regional Context and Research Design for Native American Archaeological Resources (Byrd et al. 2017). The archaeologist will prepare a draft ADRP, which will identify the scientific/historical research questions that are applicable to the expected resource, the data classes the resource is expected to possess, and how the expected data classes will address the applicable research questions. Data recovery, in general, shall be limited to the portions of the historical resource that could be adversely affected by the proposed project. Destructive data recovery methods will not be applied to portions of the archaeological resources if nondestructive methods are practical.

Mitigation Measure CULT-5: Encountering Native American Remains

Although unlikely, if human remains are encountered, all work must stop in the immediate vicinity of the discovered remains and the County Coroner and a qualified archaeologist must be notified immediately so that an evaluation can be performed. If the remains are deemed to be Native American and prehistoric, the Native American Heritage Commission must be contacted by the Coroner so that a "Most Likely Descendant" can be designated and further recommendations regarding treatment of the remains is provided.

IMPACT SIGNIFICANCE AFTER MITIGATION

Implementation of the Mitigation Measures listed above will ensure all impacts to tribal cultural resources are reduced to a less than significant level.

SOURCES

- City of St. Helena General Plan Update 2040; Adopted May 14, 2019.
- Archaeological Survey Report (ASR), Alta Archaeological Consultants (ALTA), March 2021.
- Report of Subsurface Exploratory Archaeological Trenching (letter report), ALTA, June 2021.

UTILITIES/SERVICE SYSTEMS	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

ENVIRONMENTAL SETTING

The existing Project area is served by both a private water system and City water supply as well as serviced by the City storm drains, all discussed below. No increases in impervious area are proposed. The area surrounding the Project site has little storm drain infrastructure. The proposed Project consists of alterations to the existing drainage that are proposed in the Master Utility Plan, which identifies a storm drain in Mills Lane with an eventual connection and outfall in the Napa River.

Water Supply

Per the City of St. Helena Water Neutral Policy for Development, the City requires new development to be water-neutral (from the City-delivered water system) through any combination of on-site water conservation measures

and/or off-site retrofitting and/or well water. The required retrofits shall be calculated as specified in the city's water neutrality policy as adopted by council resolution and approved by the director of public works/city engineer. If the city council determines that retrofitting of existing residential or nonresidential buildings is impractical or constitutes an unusual hardship on an applicant, it may authorize the payment to the city of an in-lieu retrofit fee in lieu of complying with these requirements. The in-lieu fee shall be the equivalent of the cost of retrofitting a sufficient number of existing homes with the ULF toilets and other required water-saving devices.

The City of St. Helena follows the State of California's Model Water Efficient Landscape Ordinance, requires water efficient landscapes in new landscape projects over 500 square feet and retrofitted landscapes over 2,500 square feet.

The City has three sources of potable water: Bell Canyon Reservoir, water purchased from the City of Napa, and groundwater. The City extracts potable water from two groundwater wells at its Stonebridge Well Complex located near the Napa River, south of Pope Street. The City also has two sources of non-potable water: Lower Reservoir on York Creek and a groundwater well just north of the access to the Pope Street Bridge. The non-potable water is used almost exclusively for irrigation. The City also owns a capped well on its Adams Street property. This well is a potential future source of groundwater and potentially, if treated, of potable water.

Wastewater

The City of St. Helena provides wastewater collection and treatment service in St. Helena. The City's wastewater infrastructure includes a wastewater treatment plant, a wastewater collection system that uses 8- and 24-inch pipe and trunk lines, and one wastewater lift station. The City of St. Helena Wastewater Treatment Plant operates under permits from the California Regional Water Quality Control Board. The most recent new permit was issued on January 12, 2016. The permitted capacity is the average dry weather flow which shall not exceed 0.65 million gallons a day.

The City maintains a network of over 22 miles of pipe and trunk lines that collect sewage and currently provides sewer service to approximately 1,726 connections. Approximately 75 percent of these connections are residential. All sewer connections are located within city boundaries.

Stormwater Drainage Facilities

The City is divided into two major subwatersheds, York Creek and Sulphur Creek. Both watersheds drain into the Napa River watershed.

Development of storm drainage infrastructure for the adjacent Farmstead projects is governed by the guidelines within the City of St. Helena Highway 29 Specific Plan. Per the Specific Plan, new drainage facilities will be required to accommodate increased runoff due to development. The City of St. Helena Storm Drain Master Plan lays out the future expansion of the city's storm drain infrastructure to serve new development. The Specific Plan includes a Master Utility Plan that identifies the proposed storm drain infrastructure in the Specific Plan area, including adjacent to the Farmstead projects. The Master Utility Plan identifies a storm drain in Mills Lane with an eventual connection and outfall in the Napa River.

The Specific Plan requires developers of major projects to perform a drainage and hydrology analysis, including a discussion of existing stormwater runoff quantities and the capacity of downstream drainage facilities to accommodate project flows. If inadequate downstream drainage facilities are found to exist, a program to either upgrade existing facilities or construct new drainage facilities consistent with the Specific Plan and the Storm Drain Master Plan shall be identified.

Solid Waste

The City of St. Helena contracts with Upper Valley Disposal Service to provide solid waste collection and recycling. The Upper Valley Disposal Service collects, sorts, recycles and transports commercial and solid waste to the Clover Flat Landfill, located north of St. Helena, on the Silverado Trail. The Clover Flat landfill has a permitted capacity of 4.90 million cubic yards. As of 2018, the landfill has a remaining capacity of approximately 2.62 million cubic yards.

The landfill has 10 years remaining on its existing franchise agreement with Napa County, but has an estimated capacity to last approximately 30 years and is expected to close in 2047.

REGULATORY SETTING

St. Helena General Plan Update 2040

The following General Plan policies relate to Utilities and Service:

LU1.2 – Allow urban development to occur only within the Urban Limit Line. Consider an exception for on-site employee housing on Agricultural lands. Urban services, such as sewer, water, and storm drainage, will only be extended to development within the Urban Limit Line.

PF1.1 – Require that the approval of new development be contingent upon the ability of the City to provide water without exceeding the safe annual yield of its water supply system.

PF1.5 – Continue to implement and update as necessary the City's Water Management Plan Ordinance and the City's Ordinance containing the Water Use Efficiency Guidelines, along with other existing water conservation ordinances and measures.

PF1.6 – Aggressively promote adoption of "best practices" for reducing water usage in the existing housing stock through the City existing Ordinances and Water Conservation Plans.

PF1.E – Permit no new development relying on groundwater unless and until it is determined that the incremental production of ground water to support the development will not adversely impact the water production capability of the aquifer supporting the City wells.

PF1.M – Limit any future non-residential development to projects that incorporate "best practices" for water conservation.

PF2.1 – Ensure adequate sewage treatment capacity at the City treatment plant to meet the needs of population growth, taking into account the City's Growth Management System, the Regional Housing Needs Allocation, and the needs of non-residential users.

PF3.1 – Ensure that new developments provide adequate drainage improvements and detention to mitigate flooding from increased stormwater runoff attributable to the development.

PF3.A – Require developers to provide adequate drainage improvements and detention to mitigate storm runoff from the site to the nearest major waterway. Drainage improvements can include measures such as creating settling basins, bio-swales, and the use of pervious materials for driveways and parking areas. Key waterways include York Creek, Sulphur Creek and the Napa River.

PF3.B – Continue to require that new developments contribute on a fair share basis to the extension or upsizing of storm drainage to accommodate it through the construction of infrastructure and/or the payment of Impact Fees.

PF3.E – At the time of development review, require that post-project runoff be limited to pre-project peak flow rates for the five-year and ten-year storms as a condition of approval.

PF3.G – Continue to require that new development and redevelopment projects implement Post Construction Runoff Management measures, including low impact development practices, to reduce stormwater peak flow rates and volumes from smaller, more frequently occurring storm events.

PF4.1 – Increase recycling and composting as part of a coordinated waste reduction and management program.

Highway 29 Specific Plan

The Highway 29 Specific Plan (2005) discusses water, sewer, recycled water, storm drainage and other utility requirements in Chapter 6. Generally, the Specific Plan requires that development of new land uses and intensification of existing uses will require improvements related to:

- New underground water lines.

- To provide sufficient water volume and/or pressure to meet building and fire code requirements.
- Recycled water lines shall be installed by project developers simultaneously with the installation of domestic water lines.
- New wastewater collection lines are required to connect with an existing sewer facility, project developers may be required to extend new sewer lines beyond their respective property frontage.
- New drainage facilities shall be located within a public right-of-way or public or private easements. Cross- lot drainage is discouraged.
- The St. Helena Municipal Code requires the undergrounding of existing local-serving overhead utility lines as a condition of subdivision and/or site development, undergrounding would be required as a condition of subdivision, Design Review or other land use entitlement.
- New natural gas service shall be provided.

IMPACT ANALYSIS

(a) **Less-Than-Significant Impact.** The proposed Project would not require expansion or construction of new water facilities. However, the Project will contribute to groundwater recharge through the creation of an outlet for the stormwater carried by the new storm drain along Mills Lane with an outfall at the Napa River. The Project in and of itself will result in construction of new stormwater facilities, but as discussed throughout this document, the Project is not anticipated to result in any significant impacts after mitigation. The roadway within which the storm drain will be installed (Mills Lane) will be returned to its original condition upon completion of the placement the storm drain alignment. The Project will ensure that surface water will be adequately managed within the Project footprint. The roadway will generate essentially the same amount of stormwater as they do at present because no expansion of roadway is anticipated. Conveyance of stormwater to drainage alignments and storm drains within Mills Lane will be improved through the development of the new storm drain alignment, which is considered a benefit to the community. Therefore, development of the Mills Lane Storm Drain Improvements Project would not result in a significant environmental effect related to the relocation or construction of new or expanded stormwater facilities. Impacts are less than significant.

(b) **Less-Than-Significant Impact.** The Project entails the installation of storm drain improvements along Mills Lane, which would be repaved post construction. Water will be used during construction for construction activities, and to implement BMPs such as watering to control dust and sedimentation and washing construction equipment and tires to reduce pollutants. This temporary water demand could be accommodated by existing water supplies and would not impact the availability of water purveyors to meet their existing or future needs. Once operational, the storm drain improvements would have no water demands. Therefore, the Project would have a less than significant impact in relation to this issue.

(c) **No Impact.** The Project involves the installation of storm drain improvements in the rights-of-way of existing roadways and parking lot. There would be no generation of wastewater and no impact to wastewater treatment infrastructure. The Project would have no impact in relation to this issue.

(d, e) **Less-Than-Significant Impact.** During construction, there would be a temporary increase in solid waste disposal needs associated with construction wastes. Construction wastes for the Project would include excess soil associated with excavation and site grading. Once operational, the Project would not generate any waste. Solid waste (including recyclable material) generated during Project construction would be collected by Upper Valley Disposal and Recycling and delivered to the Clover Flat Landfill outside of Calistoga. The landfill is permitted to receive 600 tons per day and as of September 2012 had 2,620,000 cubic yards of capacity remaining. As such, the Project would be served by a landfill with sufficient capacity to accommodate the Project's waste disposal needs,

and impacts associated with the disposition of solid waste would be less than significant.

MITIGATION MEASURES

None required.

SOURCES

- City of St. Helena General Plan Update 2040; Adopted May 14, 2019.
- City of St. Helena Highway 29 Specific Plan, February 2005.
- City of St. Helena Storm Drain Master Plan.
- Cal Recycle 2021: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2681?siteID=2015

WILDFIRE	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

ENVIRONMENTAL SETTING

State Responsibility Areas (SRA) are lands in California where the California Department of Forestry and Fire Protection (CAL FIRE) has legal and financial responsibility for wildfire protection and where CAL FIRE administers fire hazard classifications and building standard regulations. Local Responsibility Areas (LRA) include land in cities, cultivated agricultural lands, unincorporated non-flammable areas, and lands that do not meet the criteria for SRA of Federal Responsible Areas (Napa County, 2020). California PRC§§ 4201 through 4204 and California Government Code 51175-89 direct CAL FIRE to map fire hazard zones within state SRAs and LRAs, respectively, based on relevant factors such as fuels, terrain, and weather. These zones, referred to as Fire Hazard Severity Zones (FHSZ), are based on the physical conditions that give a likelihood that an area will burn over a 30 to 50-year period without considering modifications such as fuel reduction efforts. The zones also relate to the requirements for building codes designed to reduce the ignition potential to buildings in the wildland-urban interface zones.

The Napa County General Plan (2008) includes Policies SAF-14 through 17, which pertain to wildfire mitigation, which include criteria for development in high wildland fire hazard areas. In 2004, the County adopted the Napa Area Operational Hazard Mitigation Plan, which addresses a wide variety of disasters, including wildfires, and provides plans for reducing or mitigating these threats. The 2020 draft Napa County Multi-Jurisdictional Hazard Mitigation Plan will replace the 2004 Plan once approved.

Furthermore, CAL FIRE implements the 2017 Sonoma-Lake-Napa Unit Strategic Fire Plan, which addresses fire suppression and public safety. On the state level, the Office of Emergency Services oversees and coordinates emergency preparedness, response, and recovery within the state of California. On the local level, the St. Helena General Plan Update 2040 includes policies that limit development in areas of high and very high FHSZs, as defined by CAL FIRE (see Policy PS4.2; Napa County, 2019b).

Napa County is characterized by narrow valleys and steep, hilly terrain and has an active history of wildfire. In some areas of the County, the buildup of fuels from the reduction of fire frequency and the spread of human development has led to an increase in the probability of wildfires. However, vineyards, which are prevalent in the county, have lower fuel loads than other biotic communities (Napa County, 2005a). The Project site is located within a flat and currently developed area within City limits. The Project site is surrounded by the Napa River to the northeast and agricultural and vineyard operations to the south, and southwest. Given the Project site location, the threat of wildfire is greatly diminished.

The Proposed Project is not located in an SRA, but is rather located in an Incorporated LRA (CAL FIRE, 2007). The Project site is located within a FHSZ classification of "Non-VHFHSZ" (Non-Very High Fire Hazard Severity Zone) which indicates that the Project site is not located in a very high fire hazard severity zone, as classified by Cal Fire (CAL FIRE, 2008). This zone contains fuels (e.g., grasses, shrubs, trees, vines) that are not highly susceptible to wildland fire and have a low burn probability. Land immediately east of the Project site, on the opposite side of the Napa River, is classified as a "Moderate" FHSZ in a SRA.

IMPACT ANALYSIS

(a – d) **Less-Than-Significant Impact.** According to CAL FIRE's Fire Hazard Severity Zone map for Napa County, all land within the City of St. Helena, and all land immediately surrounding the city limits, is in a non-VHFHSZ. However, the mountain ranges immediately east and west of the city limits are within and SRA and are considered a moderate to high FHSZ (CAL FIRE, 2007). While land within the city limits maybe outside an SRA, as evidence by the 2017 wildfires that destroyed large areas of Napa and Sonoma counties, the threat from wildfires extends to areas within LRAs. The Project site is not near an SRA nor other land classified as a Very High Fire Hazard Severity Zone (VHFHSZ), and is in close proximity to St. Helena Fire Station #2 (less than ¼ mile away at 1025 Dowdell Lane).

The Project site is located near the center of the incorporated City of St. Helena in a very flat, largely urban and agricultural area. Therefore, the proposed Project will not have any effect on an adopted emergency plan; nor will it exacerbate wildfire risks, require the installation of infrastructure that may exacerbate fire risk, or expose people or structures to risks associated with flooding or landslides resulting from post fire slope instability. For these reasons, impacts are considered less than significant.

MITIGATION MEASURES

None required.

SOURCES

- CAL FIRE, 2007. Fire Hazard Severity Zones in SRA; Adopted by CAL FIRE: November 7, 2007.
- CAL FIRE, 2008. Very High Fire Hazard Severity Zones in LRA as Recommended by CAL FIRE: September 24,

MANDATORY FINDINGS OF SIGNIFICANCE	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☐	☒	☐	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

IMPACT ANALYSIS

(a) **Less Than Significant With Mitigation Incorporated.** The incorporation of the biological resources, cultural resources, and tribal cultural resources mitigation measures included in this IS/MND would reduce potential impacts to a less-than-significant level. Therefore, the Project does not have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory.

(b) **Less Than Significant With Mitigation Incorporated.** Cumulatively considerable means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects (e.g., Farmstead Project), and the effects of probable future projects. The analysis within this IS/MND demonstrates that the project would not have any individually limited, but cumulatively considerable impacts. Due to the limited scope of direct physical impacts to the environment associated with construction, the project's impacts are project-specific in nature. Compliance with the conditions of approval issued for the proposed development would further assure that project-level impacts would not be cumulatively considerable. Consequently, the project along with other cumulative projects would create a less than significant cumulative impact with respect to all environmental issues.

(c) **Less Than Significant With Mitigation Incorporated.** With implementation of the IS/MND mitigation measures and BMPs discussed in the Project Description, the project would not result in substantial adverse effects to human beings, either directly or indirectly.