Initial Study/ Mitigated Negative Declaration

The Grange Campground

August 2024

Prepared for:

City of Napa
1600 1st Street
Napa, California 94559

Prepared by:

1401 Willow Pass Road, Suite 500
Concord, California 94520

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Acronyms and Abbreviations

AB	Assembly Bill
ADT	average daily traffic
ADU	accessory dwelling unit
AF	acre-feet
AFY	acre-feet per year
APN	Assessor's Parcel Number
BAAQMD	Bay Area Air Quality Management District
BMP	best management practice
CAL FIRE	California Department of Forestry and Fire Protection
CALGreen	California Green Building Standards Code
CARB	California Air Resources Board
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CNEL	community noise equivalent level
CO	carbon monoxide
CO_2	carbon dioxide
cy	cubic yard
dB	decibel
dBA	A-weighted decibel
DOC	California Department of Conservation
EIR	Environmental Impact Report
EV	electric vehicle
FHSZ	Fire Hazard Severity Zone
GHG	greenhouse gas
IS	Initial Study
LED	light-emitting diode
MND	Mitigated Negative Declaration
NFPA	National Fire Protection Association
NO_x	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NRWS	Napa Recycling and Waste Services
NVUSD	Napa Valley Unified School District
O_3	ozone
OPR	Governor's Office of Planning and Research
project	The Grange Campground
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
sf	square feet
SFBAAB	San Francisco Bay Area Air Basin
SFR	single-family residential
SNABM	Solano Napa Activity Based travel demand Model
SO_2	sulfur dioxide
SWP	State Water Project
SWPPP	Stormwater Pollutant Prevention Plan

SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
TAZ	Traffic Analysis Zone
TIS	Transportation Impact Study
USACE	U.S. Army Corps of Engineers
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
VMT	vehicle miles traveled

Document Overview

This Initial Study/Mitigated Negative Declaration (IS/MND) has been prepared in accordance with the California Environmental Quality Act (CEQA) and the CEQA Guidelines for The Grange Campground (project). The primary intent of this document is to (1) determine whether project implementation would result in potentially significant impacts to the environment, and (2) incorporate mitigation measures into the project design, as necessary, to eliminate or reduce the project's potentially significant impacts to a less than significant level.

In accordance with CEQA, projects that have the potential to result in either a direct physical change in the environment or a reasonably foreseeable indirect physical change in the environment must undergo analysis to disclose potential significant effects. The provisions of CEQA apply to California governmental agencies at all levels, including local agencies, regional agencies, state agencies, boards, commissions, and special districts. CEQA requires preparation of an IS for a discretionary project to determine the range of potential environmental impacts of that project and to define the scope of the environmental review document. As specified in Section 15064(f) of the CEQA Guidelines, the lead agency may prepare an MND if, in the course of the IS analysis, it is recognized that the project may have a significant impact on the environment but that implementation of specific mitigation measures would reduce potentially significant impacts to a less than significant level. As the lead agency for the proposed project, the City of Napa (City) has the principal responsibility for conducting the CEQA environmental review to analyze the potential environmental effects associated with project implementation. During the review process, it was determined that potential impacts would be reduced to less than significant levels with the implementation of mitigation measures. The City has incorporated mitigation measures to reduce or eliminate any potentially significant project-related impacts. Therefore, an IS/MND has been prepared for the proposed project.

The project has not been approved or denied. It is being reviewed for environmental impacts only. Approval of the project can take place only after the MND has been adopted.

This IS/MND is organized as follows:

- **Section 1: Project Description.** This section introduces the document and describes the project, including location, setting, and specifics of the lead agency and contacts.
- **Section 2: Initial Study Checklist.** This section discusses the CEQA environmental topics and checklist questions, identifies the potential for impacts, and proposes mitigation measures to avoid these impacts.
- **Section 3: List of Preparers.** This section lists the organizations and individuals who were consulted and/or prepared this IS/MND.
- **Section 4: References.** This section presents a list of reference materials consulted during preparation of this IS/MND.

Public Review

The IS/MND will be circulated for a 30-day public review period from September 5, 2024, to October 5, 2024.

Comments regarding this IS/MND may be made in writing and submitted to Ryder Dilley, City of Napa, 1600 1st Street, Napa, California 94559, or by email to rdilley@cityofnapa.org by 5:00 p.m. PST by the 30th day of the public review period (October 5).

There will also be an opportunity to comment on the IS/MND during the Planning Commission hearing on October 17, 2024, and the City Council hearing on November 19, 2024.

Comments should focus on the potential environmental effects of the proposed project, the adequacy of the mitigation measures proposed to mitigate those effects, and any other possible mitigation measures the commenter believes could mitigate the project's potentially significant environmental effects. If the commenter believes that the project may have a significant environmental effect that is not identified in this IS/MND, the commenter should identify the specific effect and explain why the effect would occur and why it would be significant.

Section 1 Project Description

1.1 Project Location and Setting

The project is located in the south-central portion of Napa County (County) in the City of Napa (City), approximately 14 miles north of San Pablo Bay and approximately 6.7 miles east of Sonoma County (Figure 1, Regional Location). The lot is located on the City boundary with unincorporated County land to the west and east across State Route (SR-) 121/Silverado Trail. The approximately 12.5-acre project site is adjacent to and on the west side of SR-121/Silverado Trail between Stonecrest Drive and Hagen Road. The project would be located on a vacant, undeveloped parcel in the City (Assessor's Parcel Number [APN] 052-010-011). Rural residences border the project site to the north and SR-121/Silverado Trail and single-family residences border the project site to the east and south. A winery is also located east of the site across SR-121/Silverado Trail. Unincorporated County land comprised of agricultural fields is located to the west of the site. A large rural residence is located immediately southwest of the project site across Milliken Creek. Milliken Creek runs along the western border of the project site (Figure 2, Project Location). The project site is designated by the City of Napa 2040 General Plan (Napa General Plan) as Very Low Density Residential (up to 2.0 dwelling units per gross acre) and is zoned Single-Family Residential (RS 40). The project is also located within the Floodplain Management and Traffic Impact Overlay Zone Districts.

1.2 Project Description

The project would construct a permitted "glamping" campground with up to five permanent buildings, up to 100 fixed recreational lodging units, a pool, recreational activity space, and a pervious parking area (Figure 3, Proposed Project – Phase 1, Figure 4, Units Removed for Phase 2, and Figure 5, Proposed Project – Phase 2). The 100 fixed recreational lodging units would be constructed in two phases (refer to Section 1.2.2, Project Phasing and Construction). The project will require a text amendment to the City of Napa Municipal Code (Appendix I, Text

Each individual camper trailer recreational unit would include a stationary camper trailer and outdoor space with a grill.

Amendment). The changes made by this text amendment would only apply to the proposed project site.

Building 1, the Main Office, would consist of guest check-in, gathering space, and a small market, totaling approximately 4,418 square feet. Additionally, the applicant is requesting the sale and consumption of alcohol as part of the project, so that a small portion of the Main Office could be dedicated to serving alcohol for consumption on-site. Building 2, the Meeting Room, would provide approximately 1,440 square feet of indoor/outdoor meeting space. Buildings 1 and 2 outdoor space would include an outdoor lounge area with a permanent deck (8,000 square feet) and pool area (3,500 square feet, including the pool and the pool deck). Buildings 3 through 5 would consist of back of house and administration/maintenance space, up to 640 square feet each.

The 100 fixed recreational lodging units could include a mix of tent spaces, yurts (i.e., canvas tents on platforms), and stationary camper trailers (e.g., Airstream units). The project would exclude the use of personal travel trailers and recreational vehicles (RVs).

Each individual campsite would include an outdoor grill (set up with a cooking grate) to be used for cooking and socializing around the campfire at night as in a traditional camping experience. The outdoor grills would be elevated from the ground, and guests would only be allowed to burn "goodwood" material, which is a compressed wood product that burns with less spark and smoke than traditional wood. This goodwood would be provided to guests staying at the site, and guests would not be allowed to bring any off-site fire burning products to the project site. Each campsite would also have an interior and exterior fire extinguisher as an added fire safety item. Further, the project operator would prohibit recreational fires on days with a high wildfire risk as a condition of project approval. Additionally, campground staff would remain on site at all hours and would regularly walk the property to ensure these fire reduction measures are implemented (refer to Section 1.2.3, Project Operation).

None of the stationary camper trailer units would require any kind of gas. All units are fully electric (i.e., equipped with electric water heaters, stoves). Therefore, no gas piping is proposed for the campsites. The two communal fire pits and the pool heater would utilize a single tank of propane. For these three project components, there would be a total of 120 to 130 feet of piping from the proposed propane tank. No other project components would require any type of gas on the project site.

The recreational activity space would be located near the Main Office, Meeting Room, and other proposed buildings on the site. This space would include the proposed pool and could also include a children's playground, bocce ball courts, outdoor game areas, a lawn, and internal trail space.

The pervious parking area would be an extension of drive aisle surface. The drive aisle surface would be a permeable surface that is all-weather terrain and suitable for use by emergency vehicles (refer to Section 1.2.1, Access and Circulation).

The project requires a text amendment to the City of Napa Municipal Code, Sections 17.52.515. The project would establish standards for "glamping campgrounds" where the City has approved a "glamping" permit; encourage balance between natural features and resources, and new development; assure compatibility with residential neighborhood surroundings; and serve visitors to the Napa Valley. The text amendment would authorize the "glamping" development as a conditional use for the project site. The text amendment would apply only to the subject project site and would not create a new use citywide. The text amendment sets forth standards applicable to the project site that include floor area ratio, open space, lighting, and setbacks. Because the text amendment only applies to the project site, the potential impacts on the environment described in this Initial Study Mitigated Negative Declaration cover the potential impacts of the amendment to the City of Napa Municipal Code.

1.2.1 Access and Circulation

Primary ingress/egress would be provided by a proposed driveway located along SR-121/Silverado Trail. A 20-foot-wide drive aisle would extend from the driveway around the project site, providing direct access to the proposed buildings and parking lot areas. This drive aisle would be wide enough to allow access for emergency vehicles. A pedestrian path would also be constructed along the SR-121/Silverado Trail highway frontage, extending pedestrian access from the north side of the site to the south with connections to the internal trail space (refer to Figure 3 and Figure 5).

1.2.2 Project Phasing and Construction

Phase 1 of the project would include construction of the five permanent buildings, 80 fixed recreational lodging units, pool, recreational activity space, and pervious parking area (refer to Figure 3). Ten of the camper trailers installed during Phase 1 of the project (shown within the red outline in Figure 4) would be removed during Phase 2 of the project. Phase 2 of the project would replace 10 camper trailers (e.g., Airstream units) with 30 luxury tent/yurt spaces (shown within the green outline in Figure 5). Phase 2 would not involve additional grading or alterations to the drive aisle; however, it would involve alterations to the utilities associated with Phase 1 to connect to the reconfigured recreational units in Phase 2. The analyses in Section 2.4, Evaluation of Environmental Impacts, of this Initial Study/Mitigated Negative Declaration (IS/MND) are based on the assumption that all 100 fixed recreational lodging units would be constructed at one time, which represents a conservative analysis.

Construction of the project is anticipated to occur over 8 to 9 months. Project construction would disturb approximately 9.3 acres of the 12.5-acre site. The proposed project would preserve as much of the natural land as possible in minimizing the amount of grading that would need to occur. Construction would require approximately 121 cubic yards of cut and 11,115 cubic yards of fill, requiring import of 10,394 cubic yards. Eight trees on site would be removed to allow for construction of the project.

Construction equipment expected to be used would include the following:

- Grader
- Dump Truck
- Concrete Trucks
- Bulldozer
- Backhoe

Construction activities throughout the entire duration of the project would occur in compliance with Napa Municipal Code, Section 8.08.025, Noise – Construction activity. In accordance with this section, construction activities shall be limited to the hours of 7:00 a.m. to 7:00 p.m., Monday through Friday. There will be no start-up of machines nor equipment prior to 8:00 a.m., Monday through Friday; no delivery of materials nor equipment prior to 7:30 a.m. nor past 5:00 p.m., Monday through Friday; no cleaning of machines nor equipment past 6:00 p.m., Monday through Friday; no servicing of equipment past 6:45 p.m., Monday through Friday; and construction on weekends or legal holidays shall be limited to the hours of 8:00 a.m. to 4:00 p.m., unless a permit shall first have been secured from the City Manager, or designee, pursuant to Section 8.08.050 of this code.

1.2.3 Project Operation

Check-in for guests would be between 2 p.m. and 9 p.m. daily. Check-out would be at 11 a.m. The proposed Main Office, Meeting Room, pool, and recreation areas would be available to overnight guests during limited hours. Locals would also have access to these amenities with reservations and on a "first come, first serve" basis as space is available.

The average expected number of project occupants (i.e., overnight guests occupying the recreational lodging units and users of the recreational facilities) during a weekend day would be 200 patrons, including a mix of tourists and locals. This volume of occupants was calculated by assuming 2.5 people per campsite with a 60-percent occupancy of the 100 units plus an additional 50 people using the Main Office, pool, and recreational areas. The peak number of occupants on the site is expected to be around 300 patrons for the uses specified above (i.e., assuming an average of 2.5 campers per tent space at 100-percent occupancy and 50 people using the other facilities).

The project is anticipated to normally include four full-time employees (i.e., administrative, security, maintenance staff), four part-time housekeeping staff, and five additional part-time staff for peak periods (e.g., weekends, summer months). An administrative staff person would arrive at the site at 6 a.m. daily. Check-in staff would be located in or around the Main Office in a small office area so when guests arrive, they would be directed to sign in and obtain site information. A security staff person would be available nightly between 9 p.m. and 6 a.m. It is anticipated that the maintenance of landscaped areas on site would be subcontracted.

Project operation would comply with the City's Noise Ordinance (Napa Municipal Code, Chapter 8.08, Noise Control Regulations), including quiet times (i.e., 9:00 p.m. and 7:00 a.m.; refer to Section 2.4.13, Noise).

Seasonal Operations

Up to 30 fixed recreational units would be in the floodway on the project site (refer to Section 2.4.10, Hydrology and Water Quality) and would need to be removed from the site during the wet season (November to March). Each unit that needs to be hauled off the project site would generate four trips, including one trip to the site and one trip to the storage location to remove the unit as well as one trip to the storage location and one trip to the site to return the unit. The storage location is assumed for the purpose of this analysis to be 20 miles from the project site.

An additional 50 units during Phase 1 and 70 units during Phase 2 would be in the floodplain on the project site (refer to Section 2.4.10) and would be moved to high ground (i.e., the parking area) on site in the event the storm forecast reaches a certain threshold. This threshold would generally be consistent with the following:

- Significant rainfall of 1 to 2 inches per day as predicted by the National Weather Service
- Rapidly increasing stream levels of the Napa River at Lincoln Avenue
- U.S. Geological Survey (USGS) Napa River Gage at Oak Knoll approaching greater than 20 feet
- Napa River Flood Forecast showing river level predictions of 22 feet (this is predicted up to 5 days in advance and is the most important predictor of flooding)
- High tides of greater than 7 feet

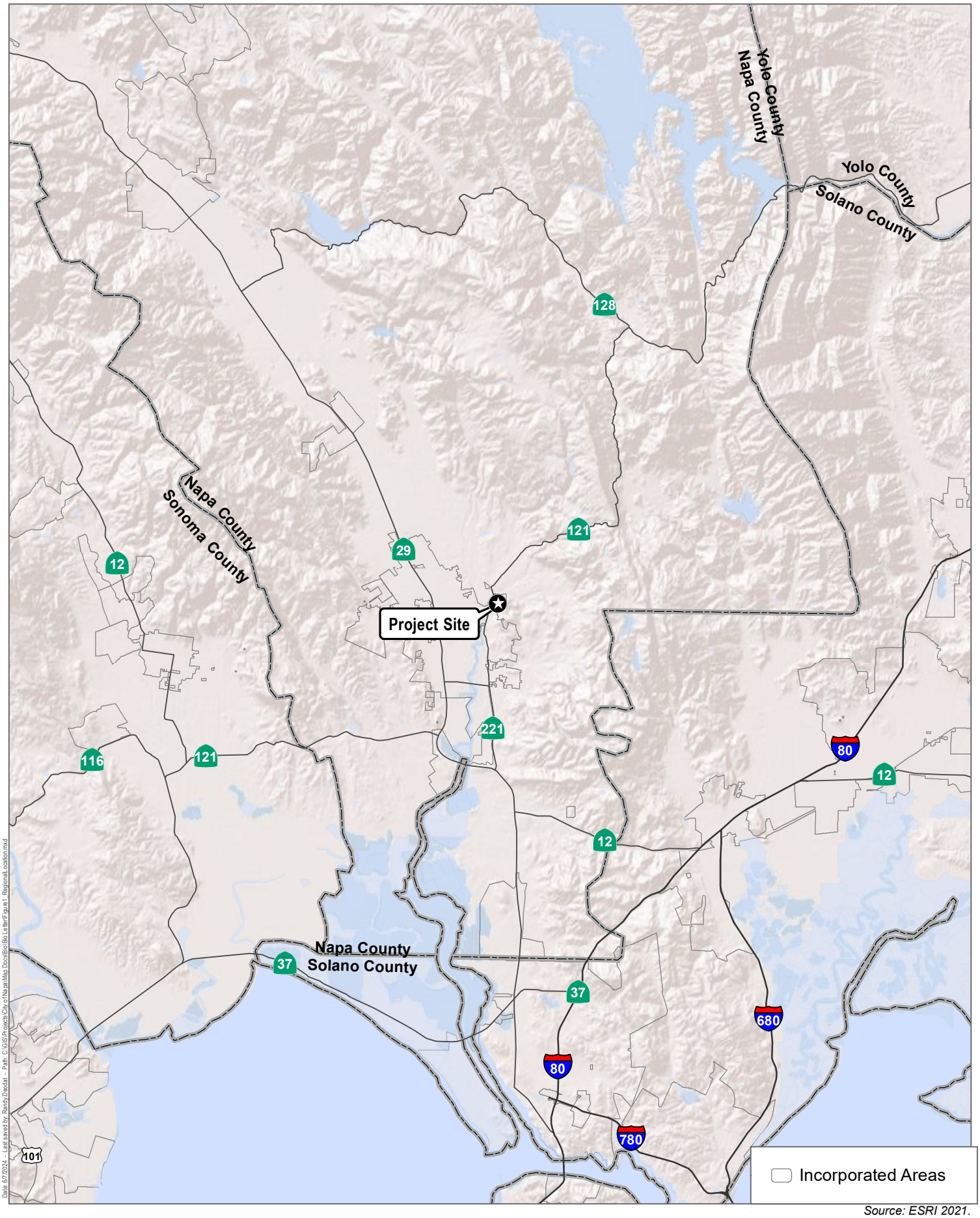
The parking area on-site would be graded to an elevation of 1 foot higher than the remainder of the site and therefore, would not be inundated during flood conditions. This parking area would be able to accommodate temporary storage of the all of units in the floodplain (i.e., 50 units during Phase 1 and 70 units during Phase 2) during flood conditions.

1.3 Regulatory Requirements, Permits, and Approvals

Given that the project site is currently zoned Single-Family Residential (RS 40), the City would prepare a text amendment to the City of Napa Municipal Code (Appendix I, Text Amendment) as part of the project. Regulatory requirements, permits, and approvals for the project are listed in Table 1. The IS/MND is intended to apply to all listed project approvals and any other approvals necessary to implement the project.

Table 1. Regulatory Requirements, Permits, and Approvals

Permit Type/Action	Agency
Text Amendment to the City of Napa Municipal Code	City of Napa
Conditional Use Permit	City of Napa
Grading Permit	City of Napa
Landscape Plan	City of Napa
Design Review Permit	City of Napa
Grading/Improvement Plan	City of Napa
General Construction Stormwater Permit	Regional Water Quality Control Board
Water District Approval	City of Napa Water Division
Sewer District Approval	Napa Sanitation District
Fire District Approval	Napa Fire Department



Source: ESRI 2021.

Harris & Associates

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Figure 1

Regional Location

The Grange Campground

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Source: Napa County Imagery 2021.

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Figure 2

Project Location

The Grange Campground

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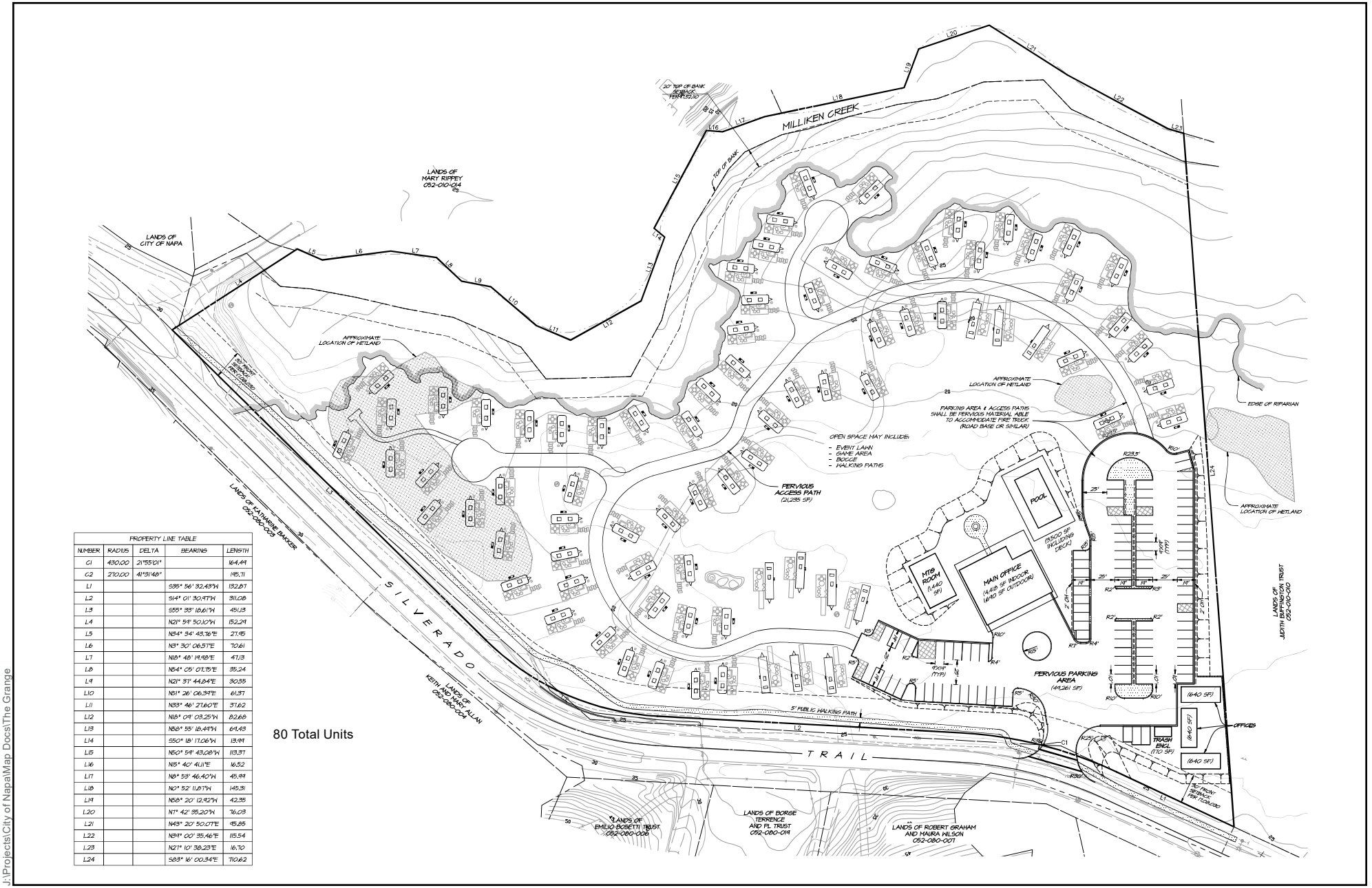

PROPERTY LINE TABLE

NUMBER	RADIUS	DELTA	BEARING	LENGTH
C1	430.00	21°55'01"		164.49
C2	270.00	41°51'48"		195.71
L1			S35° 56' 32.43"W	132.87
L2			S14° 01' 30.47"W	311.08
L3			S55° 33' 18.61"W	451.13
L4			N21° 59' 50.10"W	152.29
L5			N34° 34' 43.76"E	27.95
L6			N3° 30' 08.57"E	70.61
L7			N16° 48' 19.98"E	47.13
L8			N54° 05' 07.75"E	35.24
L9			N21° 37' 44.84"E	30.55
L10			N51° 26' 06.34"E	61.37
L11			N33° 46' 27.60"E	37.62
L12			N18° 09' 03.25"W	82.68
L13			N58° 55' 18.49"W	69.43
L14			S50° 18' 17.06"W	13.99
L15			N50° 54' 43.08"W	113.37
L16			N15° 40' 41.11"E	16.52
L17			N8° 53' 46.40"W	45.99
L18			N0° 52' 11.87"W	145.31
L19			N58° 20' 12.92"W	42.35
L20			N1° 42' 35.20"W	76.03
L21			N43° 20' 50.07"E	95.85
L22			N39° 00' 35.46"E	115.54
L23			N27° 10' 38.23"E	16.70
L24			S83° 16' 00.34"E	710.62

Source: RSA+ 2023.

Harris & Associates

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Figure 3

Proposed Project - Phase 1

The Grange Campground

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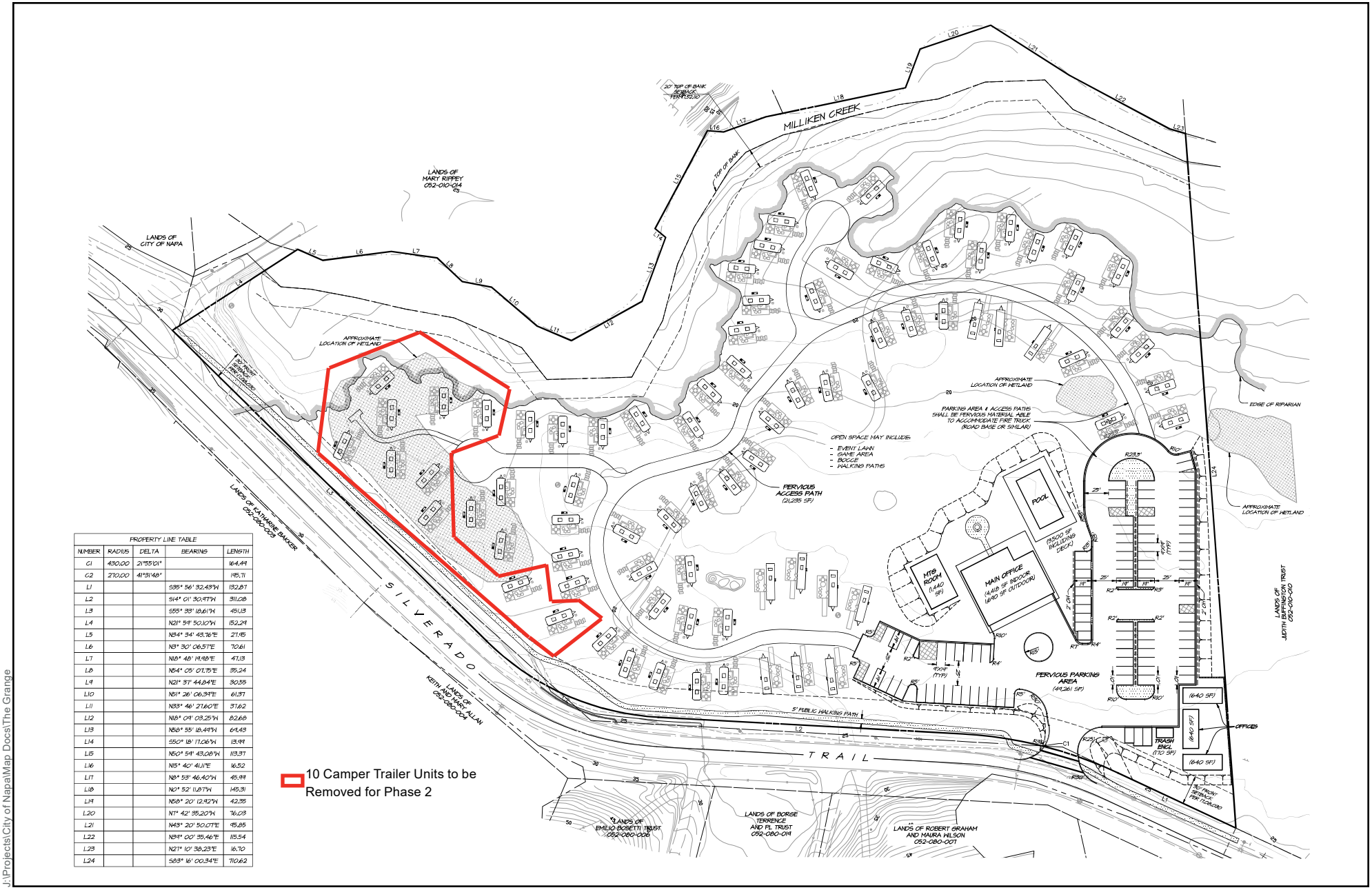

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Source: RSA+ 2023.

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Figure 4

Units Removed for Phase 2

The Grange Campground

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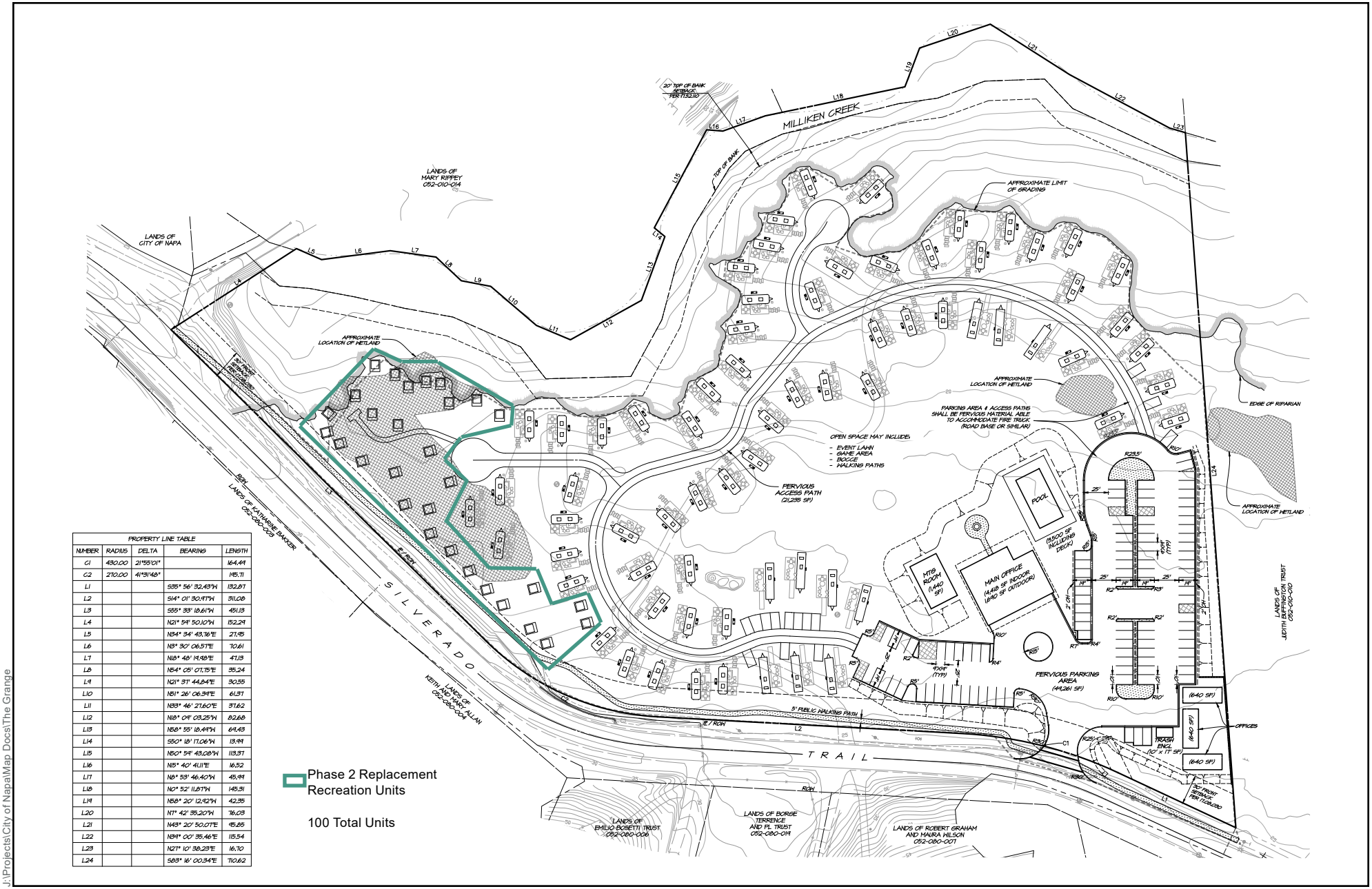

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Source: RSA+ 2023.

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Figure 5

Proposed Project - Phase 2

The Grange Campground

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Section 2 Initial Study Checklist

The following discussion of potential environmental effects was completed in accordance with Sections 15063 through 15064.5 of the California Environmental Quality Act (CEQA) Guidelines to determine if the proposed project may have a significant effect on the environment.

2.1 Project Information

1. Project title:	The Grange Campground
2. Lead agency name and address:	City of Napa 1600 1st Street Napa, California 94559
3. Contact person name and phone number:	Ryder Dilley, Associate Planner City of Napa 707-257-9225, rdilley@cityofnapa.org
4. Project location:	SR-121/Silverado Trail between Stonecrest Drive and Hagen Road, Napa, California 94559 APN 052-010-011
5 Project sponsor's name and address:	Parry Murray 1055 Hedgeside Avenue Napa, California 94558
6. General Plan designation:	Very Low Density Residential (up to 2.0 dwelling units per gross acre)
7. Zoning:	Single-Family Residential (RS 40), Floodplain Management Overlay (FP) and Traffic Impact Overlay (TI)
8. Description of project:	Refer to Section 1, Project Description, of this Initial Study/Mitigated Negative Declaration (IS/MND).
9. Surrounding land uses and setting:	Refer to Section 1 of this IS/MND.
10. Other public agencies whose approval is required:	Refer to Section 1.3, Regulatory Requirements, Permits, and Approvals, of this IS/MND.

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?	Formal consultation was conducted with the Yocha Dehe Wintun Nation. Refer to Section 2.4.18, Tribal Cultural Resources, of this IS/MND for details.

2.2 Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by the project, involving at least one impact that is a "Potentially Significant Impact" or "Less than Significant with Mitigation Incorporated" as indicated by the checklist on the following pages.

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

2.3 Lead Agency 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, including implementation of the mitigation measures identified herein. 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.

8/27/2024

Signature Date

Ryder Dilley, Associate Planner, City of Napa

2.4 Evaluation of Environmental Impacts

This section documents the screening process used to identify and focus on environmental impacts that could result from the project. The analyses in this section are conservatively based on the assumption that all 100 proposed fixed recreational units would be constructed at one time. The checklist portion of the IS begins below and includes explanations of each CEQA issue topic. CEQA requires that an explanation of all answers be provided along with this checklist, including a discussion of ways to mitigate any significant effects identified. The following terminology is used to describe the potential level of significance of impacts:

- **No Impact.** The analysis concludes that the project would not affect the particular resource in any way.
- **Less than Significant.** The analysis concludes that the project would not cause substantial adverse change to the environment without the incorporation of mitigation.
- **Less than Significant with Mitigation Incorporated**. The analysis concludes that it would not cause substantial adverse change to the environment with the inclusion of mitigation agreed upon by the applicant.
- **Potentially Significant.** The analysis concludes that the project could result in a substantial adverse effect or significant effect on the environment, even if mitigation is incorporated. If there are one or more "Potentially Significant Impact" entries when the determination is made, an Environmental Impact Report (EIR) is required.

The analyses in this section also provide discussions of the potential for cumulative impacts resulting from the proposed project in combination with other past, present, and future projects in the vicinity. Table 10, Cumulative Projects, in Section 2.4.21, Mandatory Findings of Significance, lists past, present, and future projects located within a 2-mile radius of the project that were considered and evaluated as a part of this IS/MND.

2.4.1 Aesthetics

Except as provided in Public Resources Code Section 21099, would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 non-urbanized 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 project site is bound by rural residential properties to the north, by SR-121/Silverado Trail and single-family residences to the east and south, and by Milliken Creek, residential, and agricultural lands to the west. The project site is currently vacant, with no existing buildings or structures on site.

Pursuant to Napa General Plan Policy LUCD 5-1, the City will "improve the scenic character of important gateways into the City, including SR 29, SR 121, SR 221, Soscol Avenue, Trancas Street, the SR 29/Imola intersection, and First Street, through undergrounding utilities, where feasible, increased landscaping, street tree planting, and other improvements."

The City of Napa Policy Resolution No. 27, most recently amended in December 2002, includes the City's standard conditions of project approval for all development projects, unless otherwise authorized by the City or superseded by subsequently adopted and more stringent requirements. The following measures related to aesthetics listed in Resolution No. 27 are applicable to the proposed project:

- All new lighting on private property shall be designed to eliminate direct light spilling onto adjacent residential properties.
- Low-level lighting shall be utilized in any parking area(s) as opposed to elevated high intensity light standards.
- All new utilities shall be placed underground.

- The Developer shall comply with the following:
  - The plans submitted for the project improvements or building permit, whichever comes first, shall include a final landscape and irrigation plan designed and signed by a licensed landscape architect or landscape contractor. The final landscape plans shall specify that:
    - all plant materials be certified by the Napa County Agricultural Commissioner inspection program for freedom from the glassy winged sharpshooter or other pests identified by the Agricultural Commissioner, and
    - the Agricultural Commissioner's Office shall be notified of all impending deliveries of live plants with points of origin outside of Napa County so that inspection can be arranged. No improvement plans shall be approved nor building permit issued until the Planning Department approves the landscape and irrigation plan. Prior to occupancy, the licensed professional who signed the final landscape and irrigation plan shall certify in writing to the Planning Director that he/she has inspected and approved the installation of landscaping and irrigation and has found them to be consistent with the approved plans including, but not limited to, the certifications and inspections by the Agricultural Commissioner as well as that the systems are in working order. A substitution of an alternate licensed professional may be allowed by the Planning Director upon a showing of good cause.
  - Prior to occupancy, Developer shall execute and record the City's Landscape Maintenance Agreement.
- The Developer shall secure separate architectural review approval for any signage for the project.

Impact Analysis

a. Would the project have a substantial adverse effect on a scenic vista?

No Impact. A vista is a view from a particular location or composite views along a roadway or trail. Scenic vistas often refer to views of natural lands but may also be compositions of natural and developed areas or even entirely of developed and unnatural areas, such as a scenic vista of a rural town and surrounding agricultural lands. Typical scenic vistas are locations where views of rivers, hillsides, and open space areas can be obtained as well as locations where valued urban landscape features can be viewed in the distance. What is scenic to one person may not be scenic to another; therefore, the assessment of what constitutes a scenic vista must consider the perceptions of a variety of viewer groups.

The items that can be seen within a vista are visual resources. Adverse impacts to individual visual resources or the addition of structures or developed areas may or may not adversely affect the vista. Determining the level of impact to a scenic vista requires analyzing the changes to the vista as a whole and to individual visual resources.

As described in the Napa General Plan, the City contains visual resources affording opportunities for scenic vistas in the community. New development can often have the potential to obstruct, interrupt, or detract from a scenic vista. The project would construct a permitted "glamping" campground with up to five permanent buildings, up to 100 fixed recreational units, a pool, recreational activity space, and a pervious parking area on an approximately 12.5-acre project site. Based on a review of the Napa General Plan, the City has not identified or designated scenic vistas within or adjacent to the project site. Since the proposed project is not located within a designated scenic vista, no impact would occur to a scenic vista.

Table 10 in Section 2.4.21 lists past, present, and future projects located within a 2-mile radius of the project that were considered and evaluated as a part of this IS/MND. Cumulative projects in the vicinity of the proposed project have the potential to result in impacts to scenic vistas in the community. For example, the Ritz-Carlton hotel would be located adjacent to the Napa River and Oxbow Preserve, a 12.7-acre nature preserve. Given that the proposed project would result in no impacts related to scenic vistas and that other cumulative projects would be required to mitigate potential impacts to the extent feasible, the project would not contribute to a cumulatively considerable impact related to scenic vistas.

b. Would the project substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Less Than Significant Impact. The California Scenic Highway Program protects and enhances the scenic beauty of California's highways and adjacent corridors. A highway can be designated as scenic based on how much natural beauty can be seen by users of the highway, the quality of the scenic landscape, and if development impacts the enjoyment of the view. According to the California Department of Transportation (Caltrans) State Scenic Highway Map Viewer (Caltrans 2023), the nearest officially designated state scenic highway to the project site is a segment of SR-12 near the communities of Kenwood and Glen Ellen, located approximately 11.6 miles west of the project site. Due to distance and varying topography, the project site is not visible from SR-12.

The Napa General Plan Policy LUCD 5-1 identifies the City's key gateways and scenic corridors, which include SR-29, SR-121, SR-221, Soscol Avenue, Trancas Street, the SR-29/Imola intersection, and First Street. The nearest of these scenic corridors, SR-121, is located adjacent to the eastern border of the project site. Additionally, SR-121/Silverado Trail is the nearest eligible state scenic highway. Views of the project site are currently afforded only from an approximately 0.26-mile portion of SR-121/Silverado Trail. Given the posted speed limit of 40 miles per hour, travelers along SR-121/Silverado Trail are assumed to have a potential viewing duration of approximately 23 seconds travelling at the posted speed limit. Views of the site for travelers along SR-121/Silverado Trail are partially screened by existing trees along the border of the project site with the roadway. Approximately eight existing trees across the project site would be removed to facilitate the proposed development. The proposed project would retain the majority of the existing trees on site, which

would continue to provide some visual screening along SR-121/Silverado Trail. The proposed project would not substantially damage scenic resources. In addition, SR-121/Silverado Trail is not an officially designated state scenic highway. Therefore, the project would not damage scenic resources within a state scenic highway. Impacts would be less than significant.

Cumulative projects in the vicinity of the proposed project (refer to Table 10), for example, the Ritz-Carlton hotel have the potential to result in impacts to scenic resources visible from SR-121/Silverado Trail. Given that the project would result in a less than significant impact related to scenic resources and that other cumulative projects would be required to mitigate potential impacts to the extent feasible, the project would not contribute to a cumulatively considerable impact related to scenic resources within a state scenic highway or City-designated scenic corridors.

c. Would the project, in non-urbanized 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?

Less Than Significant Impact. The project site is in an urbanized residential neighborhood, and is surrounded by large estate residences, open space, and agricultural lands. Given that the project site is in an urbanized area, this analysis evaluates if the project would conflict with applicable zoning and other regulations governing scenic quality. The Napa General Plan land use and zoning designations for the project site are Very Low Density Residential and Single-Family Residential (RS 40). The project is also located within the Floodplain Management and Traffic Impact Overlay Zone Districts (see Section 2.4.10, Hydrology and Water Quality, and Section 2.4.17, Transportation, respectively). The project would require a text amendment to the City of Napa Municipal Code (Appendix I, Text Amendment) to allow for the proposed "glamping" use at the project site. Therefore, with this text amendment, the project would not conflict with applicable zoning and other regulations governing scenic quality. Impacts would be less than significant.

Additionally, although the project is in an urbanized area, the proposed project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. Public views of the project site are currently afforded only from an approximately 0.26-mile portion of SR-121/Silverado Trail. As described in Section 2.4.1(b), travelers along SR-121/Silverado Trail are assumed to have a potential viewing duration of approximately 23 seconds travelling at the posted speed limit of 40 miles per hour. Public views of the site for travelers along SR-121/Silverado Trail are partially screened by existing trees along the border of the project site with the roadway. Approximately eight existing trees across the project site would be removed to facilitate the proposed development. However, the majority of existing trees would remain on-site and would continue to provide visual screening. The proposed "glamping" campground would maintain the natural topography of the site perimeters and the scale of development would be limited (i.e., up to 7,778 sf of total building floor area and up to 11,500 sf of outdoor deck and pool

desk uses). The remainder of the site would include a mix of tent spaces, yurts, and stationary camper trailers. Therefore, the proposed development would not substantially degrade the existing visual character or quality of the site and its surroundings for travelers along the 0.26-mile portion of SR-121/Silverado Trail that affords public views of the project site.

Cumulative projects in the vicinity of the proposed project (refer to Table 10) have the potential to conflict with applicable zoning and other regulations governing scenic quality. Given that the project would result in a less than significant impact related to conflicts with applicable zoning and other regulations governing scenic quality and that other cumulative projects would be required to mitigate potential impacts to the extent feasible, the project would not contribute to a cumulatively considerable impact related to conflicts with applicable zoning and other regulations governing scenic quality.

d. Would the project create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?

Less Than Significant Impact. Development of the project would incrementally increase the amount of nighttime lighting in the surrounding area due to new interior and exterior lighting at the proposed buildings and recreational lodging units, safety lighting in the parking lot, and lighting associated with additional vehicular traffic to and from the project site. The project would install new light fixtures as part of the development of the site. The project's outdoor lighting would be minimal and shielded in such a manner that the light is directed away from streets or adjoining properties. The project would not adversely affect nighttime views or astronomical observations because the project's outdoor lighting fixtures shall be fully shielded so as to cause all emitted sustained light to be projected below an imaginary horizontal plane passing through the lowest point of the luminary, lamp or light source used in the fixture. The luminary, lamp, or light source shall not be directly visible from any adjoining residential property. In addition, the proposed project is required to comply with the City's requirements for outdoor lighting, such as Zoning Code, Section 17.10.040, which requires that exterior light be directed or shielded so as to prevent glare onto public streets and abutting residential properties. Furthermore, the project would conform to the applicable requirements of the City's Policy Resolution No. 27 and Napa Municipal Code, Section 17.08.040(I), which outlines the City's lighting requirements. As a result, the project would not significantly impact adjacent uses with light and glare from building materials. In addition, project lighting would comply with ratings listed in the California Building Standards Code, which minimizes light pollution that is disruptive to the environment by reducing the amount of backlight, uplight, and glare generated by luminaires. Therefore, the project would not create a significant new source of substantial light or glare, which would adversely affect daytime or nighttime views in the area. Impacts related to light and glare would be less than significant.

Cumulative projects in the vicinity of the proposed project (refer to Table 10), for example, the Ritz-Carlton hotel, have the potential to result in impacts related to light and glare. Given that the

project would result in a less than significant impact related to light or glare and that other cumulative projects would be required to mitigate potential impacts to the extent feasible, the project would not contribute to a cumulatively considerable impact related to light and glare.

Mitigation Measures

The analysis completed for this section indicates that no significant impacts would result from the proposed project's implementation. As a result, no mitigation measures are required.

2.4.2 Agriculture and Forestry Resources

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. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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

The project site is located within the heart of the Napa Valley wine region. This region has historically been an agricultural district since the early 1800s. Currently, the project site is surrounded by County unincorporated agricultural lands, including a large agricultural tract west of the project site across Milliken Creek.

The Napa General Plan land use and zoning designations for the project site are Very Low Density Residential (up to 2.0 dwelling units per gross acre) and Single-Family Residential (RS 40), respectively. No agricultural operations or forest land currently exist on the site. The project site

is currently vacant and undeveloped and consists of vernal marsh, coast live oak woodland, non-native grassland, and developed land (refer to Section 2.4.4, Biological Resources).

Impact Analysis

a. Would the project 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?

Less Than Significant Impact. Pursuant to the California Department of Conservation (DOC) maps, the project site is listed as Farmland of Local Importance, Urban and Built-Up Land, and Other Land (DOC 2022a). Therefore, the project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. Further, according to the aerial imagery dating back to 1985, the project site has not been used previously for agricultural purposes. The project site is currently vacant and undeveloped, with no agricultural operations on the site. In addition, the Napa General Plan land use and zoning designations for the project site are Very Low Density Residential (up to 2.0 dwelling units per gross acre) and Single-Family Residential (RS 40), respectively. The proposed project would require a text amendment to the City of Napa Municipal Code (Appendix I, Text Amendment), but would not convert agricultural uses because there are currently no agricultural uses in operation or planned for the project site. Impacts would be less than significant.

Cumulative projects in the vicinity of the proposed project (refer to Table 10) have the potential to result in impacts to farmland. Given that the project would result in a less than significant impact related to farmland and that other cumulative projects would be required to mitigate potential impacts to the extent feasible, the project would not contribute to a cumulatively considerable impact related to related to conversion of farmland to non-agricultural use.

b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The project site is not zoned for agriculture, and there are no existing Williamson Act contracts for the project site. Therefore, the project would not conflict with existing zoning for agricultural use or a Williamson Act contract, and no impact would occur.

Given that no impact would occur, the proposed project would not contribute to a cumulatively considerable impact related to conflict with existing zoning for agricultural use or a Williamson Act contract.

c. Would the project 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))?

No Impact. There is no forest land or timberland occurring on the project site, and the project site is not zoned as forest land, timberland, or zoned for timberland production. Therefore, the project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. No impact would occur.

Given that no impact would occur, the proposed project would not contribute to a cumulatively considerable impact related to conflict with existing zoning for, or rezoning of, forest land, timberland, or timberland zoned Timberland Production.

d. Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. No forest land occurs on the project site. Therefore, implementation of the project would not result in the loss of forest land or conversion of forest land to non-forest use. No impact would occur.

Given that no impact would occur, the proposed project would not contribute to a cumulatively considerable impact on forest land or conversion of forest land to non-forest use.

e. Would the project 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?

No Impact. The project would not involve other changes in the existing environment, which, due to their location or nature, could result in conversion of farmland, to non-agricultural use or conversion of forest land to non-forest use. No impact would occur.

Given that no impact would occur, the proposed project would not contribute to a cumulatively considerable impact related to conversion of farmland to non-agricultural use or conversion of forest land to non-forest use.

Mitigation Measures

The analysis completed for this section indicates that no significant impacts would result from the proposed project's implementation. As a result, no mitigation measures are required.

2.4.3 Air Quality

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:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 site is in Napa County. The County has a Mediterranean climate, which is characterized by cool, wet winters and warm, dry summers. This is largely because of a semi-permanent high-pressure zone that sits over the Pacific Ocean during much of the year and forms a fog belt (marine layer). Generalized climate in the region is regarded as dry, subhumid mesothermal, with cold, moist winters and warm, dry summers, which pushes the growing season to the wet months of the year (late winter to early spring). Vegetation often goes dormant (senescent) during the later summer months until initial rains start in the fall. The rainy season typically lasts from October through March.

The proposed project is located within the San Francisco Bay Area Air Basin (SFBAAB), where the Bay Area Air Quality Management District (BAAQMD) is responsible for regulating air quality. Air quality laws and regulations have divided air pollutants into two broad categories: criteria air pollutants and toxic air contaminants (TACs). Criteria air pollutants are a group of common air pollutants regulated by the federal and state governments by means of ambient standards based on criteria regarding public health and environmental effects of pollution (U.S. Environmental Protection Agency [USEPA] 2022). The USEPA and California Air Resources Board (CARB) have identified six air pollutants of concern (criteria air pollutants) at nationwide and statewide levels: carbon monoxide (CO), nitrogen oxides (NO_x), ozone (O_3), particulate matter (PM_{10} and $PM_{2.5}$), sulfur dioxide (SO_2), and lead. TACs are pollutants with the potential to cause significant adverse health effects. TACs can be separated into carcinogens and noncarcinogens based on the nature of the effects associated with exposure to the pollutant.

The USEPA is responsible for identifying non-attainment and attainment areas for each criteria pollutant within the SFBAAB. The SFBAAB is designated as a non-attainment area for state standards for 1-hour and 8-hour O_3, 24-hour respirable PM_{10}, annual PM_{10}, and annual $PM_{2.5}$.

The BAAQMD CEQA Air Quality Guidelines include thresholds of significance for emissions of reactive organic gases (ROGs), NOx, PM_{10}, $PM_{2.5}$, CO, and TACs to assist lead agencies in evaluating and mitigating air quality impacts under CEQA. In addition, 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 non-attainment. In April 2017, the BAAQMD adopted the 2017 Clean Air Plan: Spare the Air, Cool the Climate (2017 Clean Air Plan), which includes 85 control measures to reduce ROGs, NOx, PM_{10}, $PM_{2.5}$, TACs, and greenhouse gases (GHGs). The 2017 Clean Air Plan serves as regional air quality plan to help the SFBAAB attain all federal and state ambient air quality standards.

The City of Napa Policy Resolution No. 27 includes the City's standard conditions of project approval for all development projects, unless otherwise authorized by the City or superseded by subsequently adopted and more stringent requirements. The following measures related to air quality listed in Resolution No. 27 are applicable to the proposed project:

- Grading and construction equipment shall be shut down when not in use.
- Construction activities shall not occur during windy periods.
- Exposed soil surfaces shall be periodically sprinkled to retard dust; no City water shall be used for this purpose.

Impact Analysis

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. The applicable plans for the proposed project are the 2017 Clean Air Plan and the BAAQMD portion of the State Implementation Plan (SIP). A project would conflict with or obstruct implementation of the 2017 Clean Air Plan or SIP if it would result in substantial new regional emissions not foreseen in the air quality planning process. The 2017 Clean Air Plan outlines the following goals:

- Protect Air Quality and Health at the Regional and Local Scale: Attain all state and national air quality standards and eliminate disparities among Bay Area communities in cancer health risk from TACs.
- Protect the Climate: Reduce Bay Area GHG emissions to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050.

The first bullet is addressed in this section. The project's consistency with BAAQMD goals related to GHG emissions are addressed in Section 2.4.8, Greenhouse Gas Emissions. The SIP and 2017

Clean Air Plan rely on the Association of Bay Area Governments' growth projections, which are developed based on proposed buildout of land uses identified in the General Plans of the San Francisco Bay Region, and the cities therein. Because the SIP and 2017 Clean Air Plan project future air quality conditions based on growth projections assuming buildout of the General Plans San Francisco Bay Region, it is assumed that a project that generates similar or fewer emissions than what is allowable under its General Plan land use designation would also comply with the SIP and 2017 Clean Air Plan. The proposed project would include construction and operation of a permitted "glamping" campground with five permanent buildings and up to 100 fixed recreational units, a recreational activity space, and a pervious parking area, and would conflict with the current land use designation (Very Low Density Residential) and zoning designation (Single-Family Residential [RS 40]). A text amendment to the City of Napa Municipal Code would be required to allow for construction and operation of the proposed project. However, this zoning change would not result in an increase in growth and associated emissions compared to existing zoning. Existing zoning would allow for additional permanent residential growth. As discussed further in Section 2.4.17, Transportation, the project would be a locally serving amenity, which typically redistributes trips rather than creating new ones, improving destination proximity and thereby reducing trip lengths and total vehicle miles traveled (VMT). Therefore, development of the proposed campground would be expected to shift automobile travel patterns but would be unlikely to increase the region's total VMT and associated planned emissions. As such, the proposed project would not result in unplanned growth, and the project would not conflict with or obstruct implementation of the applicable air quality plan. Impacts related to air quality plan consistency would be less than significant.

Cumulative projects in the vicinity of the proposed project (refer to Table 10) have the potential to result in impacts related to air quality plan consistency due to increased density or unplanned population growth. Given that the proposed project would not result in unplanned permanent residential growth, the project, in combination with other cumulative projects, would not contribute to a cumulatively considerable impact related to conflicts with or implementation of the applicable air quality plan.

b. Would the project 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?

Less Than Significant Impact. Construction of the proposed project would result in temporary criteria pollutant emissions from exhaust from construction equipment, vehicle and truck trips, and fugitive dust from ground disturbance. Operation of the proposed project would result in ongoing criteria pollutant emissions from vehicle trips, recreational fires, landscaping equipment, space and water heating, and use of consumer products and reapplication of coatings and paint. Emissions from construction and operation are discussed separately below.

Construction

Project construction emissions were estimated using the California Emissions Estimator Model (CalEEMod), version 2022.1.1.21, based on construction information provided by the applicant, model default assumptions, and direction from Appendix D of the BAAMQD CEQA Guidelines, Using CalEEMod for Bay Area Projects (BAAQMD 2023). Refer to Appendix A, Air Quality and Greenhouse Gas Emissions Modeling Assumptions and Results, of this IS/MND for detailed modeling assumptions. Daily emissions levels associated with project construction are shown in Table 2, Estimated Construction Maximum Daily Air Pollutant Emissions (lb/day). Given that project construction would last for less than a year, maximum daily emissions are compared to the BAAQMD average daily emissions thresholds, consistent with BAAQMD guidelines. As shown in Table 2, the project would not exceed BAAQMD construction thresholds for any pollutant. Therefore, the project would not result in a significant impact related to ROG, NOx, or fugitive dust (PM_{10} and $PM_{2.5}$) emissions during construction. Significance of impacts related to fugitive dust (PM_{10} and $PM_{2.5}$) emissions is based on implementation of recommended best management practices (BMPs). In accordance with BAAQMD requirements, modeling assumes the project would implement BMPs that require watering twice daily and limiting vehicle speeds on unpaved roads. Additionally, the project would be consistent with the BMPs required by applicable City standards, including limiting grading during windy periods, limiting idling, and using dust retardants. The project would implement required BMPs, and as such, emissions of criteria pollutants would be below applicable thresholds, which are established to assist in maintaining or achieving regional attainment in the SFBAAB. Project construction would not result in a cumulatively considerable contribution to regional acute and long-term health impacts related to non-attainment of the ambient air quality standards. This impact would be less than significant.

Table 2. Estimated Construction Maximum Daily Air Pollutant Emissions (lb/day)

Construction Year	ROG	NOx	PM_{10} (Exhaust)	$PM_{2.5}$ (Exhaust)
2024	4	36	2	1
2025	11	1	<1	<1
BAAQMD Threshold	54	54	82	54
Significant Impact?	*No*	*No*	*No*	*No*

Source: CalEEMod, version 2022.1.1.21.

Notes: lb/day = pounds per day; NO_X = oxides of nitrogen; PM_{10} = particulate matter less than 10 microns; $PM_{2.5}$ = particulate matter less than 2.5 microns; ROG = reactive organic gas

Operation

Operational emissions were also calculated using CalEEMod, with the exception of emissions from outdoor grills and two communal propane fire pits, which were modeled based on emissions factors obtained from the USEPA (Appendix A). Vehicle trip data was obtained from the project traffic analysis (Appendix G, Transportation Impact Study). The project would not include any use of natural gas. It was assumed that occupied campsites would cook some meals daily on the

grills provided at individual camps sites. Emissions calculations conservatively assume a steady-burning traditional fire pit in operation for 3 hours per day on allowed days. Additionally, it is assumed that two communal propane fire pits would be lit for approximately 5 hours per day on allowed days. Consistent with BAAQMD Regulation 5-302, no recreational fires would be allowed on no burn days. Additionally, the project includes a design feature that prohibits recreational fires on days with a high wildfire risk. Further, fire would be limited by campsite closures and weather conditions. It is assumed that the outdoor grills and propane communal fire pits would be in use approximately 245 days per year. Refer to Appendix A for detailed modeling assumptions. The average estimated daily operational criteria pollutant emissions from the proposed project are provided in Table 3, Operational Average Daily Air Pollutant Emissions. As shown in Table 3, operational emissions from the proposed project would not exceed any of the significance thresholds for average daily or annual operational emissions. Air quality impacts associated with operation of the project would be less than significant. Because emissions of criteria pollutants under the project would be below applicable thresholds, which are established to assist in maintaining or achieving regional attainment in the SFBAAB, project operation would not result in a cumulatively considerable contribution to regional acute and long-term health impacts related to non-attainment of the ambient air quality standards. No mitigation is required during project operation.

Table 3. Operational Average Daily Air Pollutant Emissions

	Average Daily Emissions							
	ROG		NO_x		PM_{10}		$PM_{2.5}$	
Emission Source	lb/day	tpy	lb/day	tpy	lb/day	tpy	lb/day	tpy
Mobile	2	<1	2	<1	3	1	1	<1
Area	1	<1	<1	<1	<1	<1	<1	<1
Energy	<1	<1	<1	<1	<1	<1	<1	<1
Outdoor Grills	5	1	2	<1	53	7	32	4
Propane Fire Pits	<1	<1	<1	<1	<1	<1	<1	<1
Total Operational Emissions	**8**	**1**	**4**	**1**	**56**	**8**	**33**	**4**
BAAQMD Threshold	54	10	54	10	82	15	54	10
Significant Impact?	*No*	*No*	*No*	*No*	*No*	*No*	*No*	*No*

Source: CalEEMod, version 2022.1.1.21.

Notes: lb/day = pounds per day; NO_x = nitrogen oxides; PM_{10} = respirable particulate matter; $PM_{2.5}$ = fine particulate matter
Emission quantities are rounded to the nearest whole number; ROG = reactive organic gases; tpy = tons per year

Construction and operation of cumulative projects in the project vicinity would contribute to cumulative criteria pollutant emissions in the SFBAAB. For example, the Ritz-Carlton hotel would develop a 351-room hotel with additional meeting, restaurant, and retail space; First & Oxbow Hotel would develop a 123-room hotel; the First Street Apartments II would develop a 50-unit multi-family apartment complex; and the Franklin Station Post Office would develop a 163-room hotel with additional retail space. Given that the project's estimated construction and operational

criteria pollutant emissions would remain well below BAAQMD's thresholds of significance, the proposed project would not 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. Therefore, the project would not contribute to a cumulatively considerable impact related to criteria pollutant emissions.

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. Sensitive receptors generally include schools (preschool–12th grade), hospitals, resident care facilities, daycare centers, and residences. Impacts to sensitive receptors are typically analyzed for CO hotspots and exposure to TACs. An analysis of the project's potential to expose sensitive receptors to these pollutants is provided below.

CO Hotspots

Vehicle exhaust is the primary source of CO. In an urban setting, the highest CO concentrations are generally found within proximity to congested intersections. Under typical meteorological conditions, CO concentrations tend to decrease as distance from the emissions source (i.e., congested intersection) increase. A CO hotspot is a localized concentration of CO that is above the state or national 1-hour or 8-hour CO ambient air standards. An air quality impact is considered significant if CO emissions create a hotspot where either the California 1-hour standard of 20 parts per million or the federal and California 8-hour standard of nine parts per million is exceeded. This typically occurs at severely congested intersections (level of service E or worse) (Caltrans 2010). The project includes the construction of a permitted "glamping" campground and would result in the minimal addition of approximately 31 trips during peak hour (refer to Section 2.4.17; Appendix G). As discussed further in Section 2.4.17, the project is anticipated to have an incremental impact on regional VMT. As such, the project's minimal additional traffic would not cause any intersections in the project vicinity to operate at a deficient level of service and the project would not substantially contribute to the potential for a CO hotspot to occur. This impact would be less than significant.

Toxic Air Contaminants

Construction

Construction activities would result in short-term, project-generated emissions of diesel particulate matter from the exhaust of off-road, heavy-duty diesel equipment. CARB identified diesel particulate matter as a TAC in 1998. The dose to which receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the duration of exposure to the substance. Thus, the risks estimated for a maximally exposed individual are higher if a fixed exposure occurs over a longer time period. According to the Office of Environmental Health Hazard Assessment, health risk assessments,

which determine the exposure of sensitive receptors to TAC emissions, should be based on a 30-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the project.

There would be relatively few pieces of off-road, heavy-duty diesel equipment used during construction, and the construction period would be relatively short (approximately 8 to 9 months), especially when compared to 30 years. As shown in Table 2, exhaust particulate emissions from the project would be minimal. Combined with the highly dispersive properties of diesel particulate matter and additional reductions in exhaust emissions from improved equipment, construction-related emissions would not expose sensitive receptors to substantial emissions of diesel particulate matter. Therefore, impacts from construction emissions of TACs would be less than significant.

Operation

Health risk assessments are typically conducted for substantial sources of diesel particulate emissions (e.g., truck stops, bus stations, and warehouse distribution facilities). In addition, typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes, automotive repair facilities, and dry-cleaning facilities. The project consists of a permitted "glamping" campground with a small number of food truck vendors that is not a typical source of TACs and does not warrant a health risk assessment. As such, the proposed commercial uses would not generate substantial TACs, and impacts would be less than significant.

Given that the proposed project would not expose sensitive receptors to substantial sources of CO or TACs, and that none of the identified cumulative projects are located within the immediate vicinity (2,000 feet) of the project site, the project would not contribute to a cumulatively considerable impact related to CO hotspots and exposure to TACs.

d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact. The project could produce objectionable odors during the construction phases of paving and painting activities, which would require bitumen and solvents from the placement of hot asphalt and architectural coating. Exhaust from construction equipment may also generate odors. However, due to the dispersive nature of odors and the short-term, temporary nature of these activities, these impacts would be negligible and short term. Given the low-density nature of the rural residential neighborhood where project construction would occur, the project would not cause objectionable odors affecting a substantial number of people. Furthermore, the project would be subject to BAAQMD Regulation 7, Odorous Substances. This rule places general limitations on odorous substances and specific emission limitations on certain odorous compounds. Additionally, BAAQMD Regulation 1, Rule 1-301, Public Nuisance, states that no person shall discharge from any source whatsoever quantities of air contaminants or other materials that cause injury, detriment, nuisance, or annoyance to any considerable number of

persons or the public; endanger the comfort, repose, health, or safety of any such persons or the public; or cause, or have a natural tendency to cause, injury or damage to businesses or property. The project would result in development of a permitted "glamping" campground which may result in occasional odors from outdoor food preparation at individual camp sites. However, exposure would be temporary, intermittent, and limited to close proximity to the campsites. Thus, the project would not create objectionable odors affecting a substantial number of people during construction or operation.

Given that the proposed project's impacts related to odors would be less than significant, and that none of the identified cumulative projects are located within the immediate vicinity (2,000 feet) of the project site, the project would not contribute to a cumulatively considerable impact related to objectionable odors.

Mitigation Measures

The analysis completed for this section indicates that no significant impacts would result from the proposed project's implementation. As a result, no mitigation measures are required.

2.4.4 Biological Resources

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 Game 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 Game or US 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 applicable policies protecting biological resources?	☐	☐	☒	☐
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other applicable habitat conservation plan?	☐	☐	☐	☒

Environmental Setting

A Biological Resources Technical Report was prepared for the project by Harris & Associates, dated August 2024 (Appendix B, Biological Resources Technical Report). In preparation of the Biological Resources Technical Report, literature and database reviews, a general biological reconnaissance survey, vegetation mapping, and an aquatic resources delineation were conducted. The general biological reconnaissance survey, vegetation mapping, and aquatic resources delineation were conducted during a site visit on March 22, 2023. The impact analysis below is based on the analysis and findings of the Biological Resources Technical Report.

Vegetation Communities

Seven vegetation communities and land cover types were observed in the survey area: non-vegetated channel, fresh water, vernal marsh, coast live oak woodland, non-native grassland,

agriculture/orchard, and developed land (Holland 1986). Table 4, Vegetation Communities and Land Cover Types on the Project Site and in the Survey Buffer, presents the acreages of the vegetation communities and land cover types that occur in the survey area. Figure 6, Vegetation Communities and Land Cover Types, presents the vegetation community and land cover type boundaries.

Table 4. Vegetation Communities and Land Cover Types on the Project Site and in the Survey Buffer

Vegetation Community and Land Cover Type	Project Site (acres)[1]	Survey Buffer (acres)[1]
Freshwater Wetlands and Waters		
Non-vegetated channel[2]	0.03	<0.01
Fresh water[2]	0.00	0.61
Vernal marsh[2]	0.71	0.16
Subtotal	0.74	0.77
Woodland and Forest		
Coast live oak woodland[2]	7.20	4.76
Grassland		
Non-native grassland	3.28	0.92
Disturbed/Developed		
Agriculture/orchard	0.00	0.14
Developed land	0.10	1.69
Subtotal	*0.10*	*1.83*
Total	**11.32**	**8.28**

Sources: Holland 1986; CDFW 2024a.

Notes:

[1] Acreages rounded up to one-hundredth.

[2] Considered a sensitive vegetation community by California Department of Fish and Wildlife (CDFW).

Non-Vegetated Channel: Two non-vegetated channels, AF-1 and AF-2, occur in the southern portion of the survey area (Figure 6).

Fresh Water: Approximately 0.61 acre of fresh water, contained entirely within the banks of Milliken Creek, occurs along the western edge of the survey buffer, outside of the project site. Milliken Creek is a perennial stream with downstream connectivity to the Napa River, approximately 500 feet southwest of the survey area. No fresh water occurs within the project site (Figure 6).

Vernal Marsh: Approximately 0.71 acre across three vernal marshes (W-1 through W-3) occur in the project site, with the remaining 0.16 acre in the survey buffer. The largest vernal marsh, W-1 (0.63 acre), occurs within the valley oak woodland in the southern portion of the survey area (Figure 6). The two other smaller vernal marshes, W-2 (0.17 acre) and W-3 (0.07 acre), occur within the non-native grassland in the northern portion of the survey area.

Coast Live Oak Woodland: Approximately 7.20 acres of coast live oak woodland occurs throughout the majority of the project site, and within 4.76 acres of the survey buffer (Figure 6). Coast live

oak woodland is absent only in the northeastern portion where non-native grassland is the dominant vegetation community. In the survey area, the coast live oak woodland is dominated by coast live oak (*Quercus agrifolia*) with a moderately dense canopy, with California bay (*Umbellularia californica*) as a subdominant species, and valley oak (*Quercus lobata*) and California walnut (*Juglans californica*) interspersed throughout. Approximately four red ironbark eucalyptus (*Eucalyptus sideroxylon*) occur along the southeastern edge of the survey area along the Silverado Trail roadway.

Non-Native Grassland: Approximately 3.28 acres of non-native grassland occurs in the northeastern portion of the project site and 0.92 acre of the survey buffer (Figure 6). Non-native grassland in the survey area consists mainly of meadow foxtail (*Alopecurus pratensis*), foxtail barley (*Hordeum murinum*), and rat-tail fescue (*Festuca myuros*). Non-native grassland composes the herbaceous understory for most of the coast live oak woodland throughout the survey area as well.

Agriculture: Approximately 0.14 acre of agricultural land occurs on the eastern edge of the survey buffer, outside of the project site. Agricultural land is limited to one parcel of land being utilized as a small vineyard on the east side of Silverado Trail. No agricultural land occurs within the project site (Figure 6).

Developed Land: Approximately 0.10 acre of developed land occurs along the eastern edge of the project site, with 1.69 acres in the survey buffer (Figure 6). Developed land in the survey area is primarily within the Silverado Trail roadway and residential driveways to the east.

Wetlands

Milliken Creek flows north to south to the west of the project site, which connects to the Napa River approximately 500 feet southwest of the project site (Figure 7, Aquatic Resources). Milliken Creek is a perennial stream with downstream connectivity to the Napa River, which flows into the Pacific Ocean via San Pablo Bay approximately 16 miles south of the project site (USGS 2024). Additionally, two unnamed non-vegetated channels (AF-1 and AF-2) were observed running east to west through the southern portion of the survey area where they connect to Milliken Creek to the west (Figure 7). These channels begin at the outlets of two separate stormwater culverts on the eastern and southeastern sides of the survey area. While historical disturbance is evident in the survey area, the drainage patterns in the survey area appear to be natural in origin and continue to discharge surface water into Milliken Creek along the west side of the survey area. Three vernal marshes (W-1, W-2, and W-3) were observed in the northern and southern portions of the survey area (Figure 7). These vernal marshes appear to have formed in discrete topographic lows in the survey area and may have developed relatively recently as a result of changes in upstream drainage patterns.

Impact Analysis

a. Would the project 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?

Less Than Significant with Mitigation Incorporated. Sensitive species are those plants and animals listed as Rare, Endangered, Threatened, or otherwise noteworthy by the California Department of Fish and Wildlife (CDFW), U.S. Fish and Wildlife Service (USFWS), California Native Plant Society, National Audubon Society, City of Napa, or other conservation agencies, organizations, or local biologists.

Sensitive Plant Species

No sensitive plant species were observed on the project site during the March 2023 site visit. However, one sensitive plant species, small spikerush, was determined to have a high potential to occur in the survey area. Implementation of the project could result in the direct loss of this sensitive plant species with a high potential to occur in the survey area. Figure 8, Impacts to Biological Resources, shows the extent of impacts on the project site from project construction.

Small spikerush is a CRPR 4.3 species and is not state or federally listed or not listed as rare by the California Native Plant Society. Small spikerush is relatively common in the state and is not considered significantly rare. Therefore, impacts to this plant species would not be significant under CEQA due to its lack of sensitivity listing, and direct impacts would be less than significant with no mitigation required.

Sensitive Animal Species

No sensitive wildlife species were observed in the survey area during the March 2023 site visit. However, three sensitive species, monarch butterfly, California freshwater shrimp, and California red-legged frog, were determined to have a high potential to occur. The project has the potential to directly impact these species during construction activities and operation of the project through displacement of individual wildlife or elimination of portions of their habitat (Figure 8). In addition, the three wildlife species with a high potential to occur are smaller species, including two invertebrates and one amphibian, which could be impacted by clearing, grading, and other construction activities. Implementation of the project would result in direct loss of habitat, including overwintering, reproduction, and foraging habitat, for the three sensitive wildlife species with a high potential to occur in the survey area.

Approximately 4.54 acres of coast live oak woodland occurs in the project impact area (Figure 8). A stand of eucalyptus trees that provide suitable overwintering habitat for monarch butterfly are present in the coast live oak woodland along the southeastern edge of the project site and proposed

impact area. If these eucalyptus trees are removed during project construction, direct impacts to monarch butterfly overwintering habitat would be significant and mitigation is required.

Milliken Creek occurs outside of the project site and project impact area, and no impacts would occur. The freshwater stream habitat within Milliken Creek that provides suitable habitat for California freshwater shrimp would not be impacted. Therefore, direct impacts to California freshwater shrimp would be less than significant and no mitigation is required.

Approximately 0.01 acre of non-vegetated channel, 0.62 acre of vernal marsh, and 4.54 acres of coast live oak woodland that provide suitable habitat for California red-legged frog occur in the project impact area. Removal of these habitats would result in direct impacts to California red-legged frog.

Temporary construction-related and long-term operational indirect impacts to wildlife generally include lighting, increased human activity, hydrologic quality (increased turbidity, excessive sedimentation, flow interruptions, and changes in water temperature), noise, vibration, and trash and garbage, which can attract both introduced terrestrial and native terrestrial and avian predators (such as American crows, common ravens, coyotes, domestic dogs, raccoons, and striped skunks). These indirect impacts in the form of habitat disturbance and potential predation could have a significant impact on the three sensitive wildlife species determined to have a high potential to occur in the survey area, monarch butterfly, California freshwater shrimp, and California red-legged frog.

Implementation of Mitigation Measures BIO-1 through BIO-5 would reduce direct and indirect impacts to sensitive wildlife species to below a level of significance. Application of Mitigation Measure BIO-1, Qualified Biologist, would reduce direct and indirect impacts to sensitive wildlife species through biological monitoring, installation of protective fencing, a worker environmental education program, tree and vegetation clearance surveys, confirming Stormwater Pollution Prevention Plan (SWPPP) compliance, application of standard BMPs and requirements that address erosion and runoff, and wildlife entrapment avoidance. Mitigation Measure BIO-2, California Red-legged Frog Avoidance and Protection, requires California red-legged frog avoidance and protection measures be implemented prior to and during construction. Implementation of BIO-4 would require the acquisition of off-site mitigation credits for sensitive vegetation community and jurisdictional aquatic resource impacts.

Nesting Birds

The survey area provides suitable nesting habitat for sensitive birds and raptors protected under the California Fish and Game Code and Migratory Bird Treaty Act. Suitable nesting habitat for sensitive birds and raptors occurs in the coast live oak woodland throughout most of the survey area and surrounding the Milliken Creek corridor in the western portion of the survey area. Although no nests were directly observed, the availability of suitable habitat and the number of bird species in general suggest that nesting is likely occurring.

If construction is initiated during the general nesting season (January 15 through September 15), temporary direct construction-related impacts could have a significant impact on the nesting birds and raptors observed or with a high potential to occur in the survey area. Impacts would occur through direct removal of nesting habitat and through disturbance to nesting birds from substantial sources of noise generated at the start of construction. Construction activities that begin during the general nesting season would have the potential to significantly impact nesting birds protected under the California Fish and Game Code and Migratory Bird Treaty Act. Impacts to sensitive nesting birds and raptors would be reduced to less than significant through implementation of Mitigation Measures BIO-3, which requires pre-construction nesting bird and raptor surveys during the general bird breeding season.

Sensitive Roosting Bats

Suitable roosting and foraging habitat for sensitive tree-dwelling bat species, including western red bat and western yellow bat, occurs in the numerous trees within the coast live oak woodland throughout most of the survey area and surrounding the Milliken Creek corridor. Impacts to 4.54 acres of coast live oak woodland and removal of those trees would result in direct impacts to sensitive roosting bats. Therefore, direct impacts to sensitive bat species from loss of roosting habitat would be significant, and mitigation is required. Impacts to sensitive roosting bats would be reduced to less than significant through implementation of Mitigation Measures BIO-1 and BIO-5, which requires monitoring by a qualified biologist and roosting bat clearance surveys prior to the removal of trees and vegetation.

Critical Habitat

No critical habitat for sensitive plants or wildlife occurs in the survey area. Critical habitat for sensitive plant species, Contra Costa goldfields, occurs 4 miles south of the survey area. Therefore, impacts would not occur to critical habitat for this species as a result of project implementation, and no mitigation is required.

Cumulative projects, such as the Ritz-Carlton hotel located at 1215 Silverado Trail which is planned in an undeveloped area adjacent to the Napa River, would have the potential to result in impacts to sensitive plant and wildlife species, including loss of habitat. However, cumulative projects would be required to comply with CEQA and applicable federal and state regulations that provide protections for sensitive plant and wildlife species, such as the federal Endangered Species Act, the California Endangered Species Act, and the California Natural Community Conservation Planning Act. In addition, some projects that impact sensitive species require approval from the USFWS and CDFW. If significant impacts occur from a cumulative project, then mitigation measures are required to be prepared and implemented to reduce impacts to the extent feasible in compliance with CEQA.

While implementation of the proposed project would have the potential to impact sensitive wildlife species, project impacts to sensitive plant species would be less than significant with implementation of Mitigation Measures BIO-1 through BIO-5. Because cumulative projects, as well as the proposed project, would be required to incorporate project-specific mitigation measures to reduce impacts to sensitive wildlife species to below a level of significance, the project would not contribute to a cumulatively considerable impact on sensitive plant and wildlife species.

b. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Less Than Significant with Mitigation Incorporated. Implementation of the project would result in permanent impacts to approximately 8.41 acres of sensitive and non-sensitive vegetation communities and land cover types that occur in the project impact area (Table 5, Impacts to Vegetation Communities and Land Cover Types; Figure 8).

Table 5. Impacts to Vegetation Communities and Land Cover Types

Vegetation Community and Land Cover Type	Project Site (acres)[1]	Impacts (acres)[1]
Freshwater Wetlands and Waters		
Non-vegetated channel[2]	0.03	0.01
Fresh water[2]	0.00	0.00
Vernal marsh[2]	0.71	0.62
Subtotal	*0.74*	*0.63*
Woodland and Forest		
Coast live oak woodland[2]	7.20	4.54
Grassland		
Non-native grassland	3.28	3.14
Disturbed/Developed		
Agriculture/Orchard	0.00	0.00
Developed land	0.10	0.10
Subtotal	*0.10*	*0.10*
Total	**11.32**	**8.41**

Sources: Holland 1986; CDFW 2024a.

Notes:

[1] Acreages rounded up to one-hundredth.

[2] Considered a sensitive vegetation community by CDFW.

The project would result in direct and indirect impacts to sensitive vegetation communities, including approximately 4.54 acres of coast live oak woodland, 0.01 acre of non-vegetated channel, and 0.62 acre of vernal marsh that occur in the project impact area. These permanent impacts would result from grading and construction of the project. As previously discussed, no impacts would occur to Milliken Creek (designated as the freshwater vegetation community) during implementation of the project. All direct permanent impacts to sensitive vegetation communities would be potentially significant without mitigation.

Agriculture, non-native grassland, and developed land are not considered sensitive vegetation communities or land cover types, and thus, impacts would not be significant. Therefore, no mitigation for impacts to these vegetation communities or land cover types is required.

Indirect impacts to sensitive vegetation communities could result from invasion by exotic species, exposure to construction-related pollutant discharges, and trampling by humans. Permanent indirect impacts to riparian habitats and other sensitive natural communities from development of the project would be potentially significant.

Implementation of Mitigation Measure BIO-1 would reduce direct and indirect impacts to sensitive vegetation communities to a less than significant level through biological monitoring, installation of protective fencing, a worker environmental education program, confirming SWPPP compliance, and application of standard BMPs and requirements that address erosion and runoff. Implementation of Mitigation Measure BIO-4, Sensitive Vegetation Communities and Jurisdictional Aquatic Resources Mitigation, would reduce direct impacts to sensitive vegetation communities to a less than significant level through the acquisition of off-site mitigation credits for sensitive vegetation community and jurisdictional aquatic resource impacts. Therefore, with implementation of Mitigation Measure BIO-1 and Mitigation Measure BIO-4, direct and indirect impacts to riparian habitats and other sensitive natural communities would be less than significant.

Cumulative projects, such as the Ritz-Carlton hotel, have the potential to result in impacts associated with riparian habitat and other sensitive natural communities through direct and indirect loss or degradation. This project would occur in an undeveloped area adjacent to the Napa River and may result in impacts to riparian habitat and other sensitive natural communities. However, cumulative projects would be required to comply with applicable federal and/or state regulations, such as the California Lake and Streambed Alteration Program or the California Natural Community Conservation Planning Act. These programs provide protections for riparian and other sensitive habitats. In addition, many projects that affect riparian or other protected habitat types require approval from the USFWS and CDFW. If potentially significant impacts would occur from a cumulative project, then mitigation measures would be implemented to reduce impacts to the extent feasible. With implementation of Mitigation Measures BIO-1 and BIO-4, project-specific impacts to wildlife corridors or habitat linkages would be less than significant. Therefore, the project would not contribute to a cumulatively considerable impact on wildlife corridors or habitat linkages.

c. Would the project 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?

Less Than Significant with Mitigation Incorporated. A total of 0.73 acre of wetland and non-wetland waters and riparian vegetation that are potentially under the jurisdiction of the U.S. Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), and CDFW, pursuant to

Sections 404 and 401 of the Clean Water Act and Section 1602 of the California Fish and Game Code, occur in the survey area. Milliken Creek flows north to south to the west of the project site, which connects to the Napa River approximately 500 feet southwest of the project site. Two unnamed non-vegetated channels (AF-1 and AF-2) run east to west through the southern portion of the survey area where they connect to Milliken Creek to the west. These channels begin at the outlets of two separate stormwater culverts on the eastern and southeastern sides of the survey area. Additionally, three vernal marshes (W-1, W-2, and W-3) occur in the northern and southern portions of the survey area.

The project has been designed to avoid aquatic resources to the greatest extent feasible. No impacts would occur to Milliken Creek or vernal marsh W-2. Further, the majority of non-vegetated channel AF-1 would be avoided during project implementation. As discussed in Section 2.4.4(b), implementation of the project would result in impacts to approximately 0.01 acre of non-vegetated channel, 0.62 acre of vernal marsh, and 4.54 acres of coast live oak woodland, which constitute the potentially jurisdictional aquatic resources and riparian zone in the project impact area. Based on the aquatic resources delineation results, AF-1, AF-2, and vernal marsh W-1 that are in the project impact area have a continuous surface connection to the Napa River (the closest traditional navigable water) via Milliken Creek. Therefore, it is likely these three aquatic resources would be considered jurisdictional by the USACE, RWQCB, or CDFW. Vernal marsh W-2 in the project impact area was determined to be an isolated feature that formed in upland and does not have a continuous surface connection to a traditional navigable water. Therefore, it is likely vernal marsh W-2 would not be jurisdictional by USACE, but it has the potential to be under the jurisdiction of the RWQCB and CDFW. The riparian zone within the coast live oak woodland has the potential to be under the jurisdiction of the RWQCB and CDFW. However, only the regulatory agencies can make a final determination of jurisdictional boundaries.

The project would be required to consult with and obtain regulatory permits from the USACE, RWQCB, and CDFW and provide compensatory mitigation for impacts prior to the start of construction that would ensure that no net loss of aquatic resources would result from implementation of the project. Therefore, direct impacts to jurisdictional aquatic resources would be potentially significant.

Indirect impacts to jurisdictional aquatic resources could result from generation of fugitive dust, changes in hydrology resulting from construction (including sedimentation and erosion), and exposure to construction-related pollutant discharges. Permanent indirect impacts to jurisdictional aquatic resources from development of the project would be potentially significant.

Implementation of Mitigation Measures BIO-1, BIO-4, and BIO-6 would mitigate direct and indirect impacts to jurisdictional aquatic resources to below a level of significance. Implementation of Mitigation Measure BIO-1 would reduce direct and indirect impacts to jurisdictional aquatic resources to a less than significant level through biological monitoring, installation of protective fencing, a worker environmental education program, confirming SWPPP compliance, and

application of standard BMPs and requirements that address erosion and runoff. Implementation of Mitigation Measure BIO-4 would reduce direct impacts to jurisdictional aquatic resources to a less than significant level through the acquisition of off-site mitigation credits for jurisdictional aquatic resource impacts. Implementation of Mitigation Measures BIO-6 would require consultation with and regulatory permits from the USACE, RWQCB, and CDFW and provide compensatory mitigation for impacts prior to the start of construction that would ensure that no net loss of aquatic resources would result from implementation of the project. With implementation of Mitigation Measures BIO-1, BIO-4, and BIO-6, the proposed project would have a less than significant impact on jurisdictional aquatic resources.

The Ritz-Carlton hotel, a cumulative project at 1215 Silverado Trail, would occur in an undeveloped area adjacent to the Napa River, and therefore, would have the potential to result in a cumulative impact associated with federally or state protected wetlands. However, cumulative projects would be required to comply with applicable federal and state regulations, such as Sections 401 and 404 of the Clean Water Act and the Porter-Cologne Act. Existing regulations would ensure that a significant cumulative impact associated with federally or state protected aquatic resources would not occur. If potentially significant impacts would occur from a cumulative project, then mitigation measures would be implemented to reduce impacts as required to meet the regulatory agency's no-net-loss standard. The proposed project would avoid impacts to jurisdictional aquatic resources to the greatest extent feasible, providing compensatory mitigation at an approved ratio for unavoidable impacts, and would not contribute to cumulatively considerable impacts to jurisdictional aquatic resources with implementation of Mitigation Measures BIO-1, BIO-4, and BIO-6.

d. Would the project 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?

Less Than Significant with Mitigation Incorporated. Wildlife corridors provide routes for local movement and regional linkages and corridors and often following linear topographic, vegetation, or water features. These corridors can be continuous habitats features, or "stepping stone" areas, providing critical rest and foraging areas for, for example, birds traveling along migratory routes. These areas allow for not only long-term genetic flow between subpopulations but also critical pathways of seasonal/migratory movements. Potential wildlife corridors can include streams, riparian areas, and culverts under roadways.

The survey area is likely to be used as a movement corridor and provides suitable nesting, foraging, and dispersal areas for both sensitive and common wildlife species because of its connections to nearby open space areas and the presence of native vegetation communities. The project site provides stopover habitat for migrating birds flying through the region to wintering grounds. Further, the project site supports a variety of vegetation communities, ranging from grasslands to woodlands and aquatic areas (including vernal marshes); most of which are high-quality contiguous patches of these habitats.

The Milliken Creek riparian corridor, non-vegetated channels, and vernal marshes that occur in the survey area provide foraging and periodic water sources for a variety of mammal, avian, reptile, and amphibian species, including sensitive species. The presence of the large agricultural field to the northwest of the survey area has the potential to limit large-scale east-west wildlife movement in the surrounding area. However, the Milliken Creek riparian corridor along the west side of the survey area likely functions as an important north-south movement corridor in the survey area and to the surrounding open space areas, especially to the southeast. The riparian corridor in the survey area has been documented to support both sensitive and common wildlife species and provides suitable nesting habitat for a variety of bird species protected by the California Fish and Game Code and Migratory Bird Treaty Act and roosting habitat for both common and sensitive bat species. Further, Milliken Creek connects to the Napa River approximately 500 feet southwest of the survey area. The Napa River and its surrounding riparian corridor is likely to function as a significant movement route for the region due to the dense residential development limiting other movement opportunities for wildlife.

The survey area is not documented as a California Essential Habitat Connectivity Area by CDFW (CDFW 2024b). However, a CDFW Small Natural Connectivity Area occurs at the confluence of Milliken Creek and the Napa River approximately 500 feet southwest of the survey area and an Essential Connectivity Area occurs approximately 2 miles to the east. Therefore, the survey area likely functions as a wildlife corridor and habitat linkage in the region.

Implementation of the project would remove the majority of the open space and high-quality habitat within the survey area and potentially discourage future use of the area by both sensitive and common wildlife species during local and regional movement. Wildlife movement would also be indirectly impacted by noise, vibration, lighting, increased human activity, hydrologic and water quality (e.g., chemical pollution, increased turbidity, excessive sedimentation, flow interruptions, and changes in water temperature), and trash and garbage, which can attract predators. Therefore, implementation of the project would result in significant impacts to wildlife movement corridors and linkages.

Implementation of Mitigation Measures BIO-1 through BIO-5 and BIO-7 would mitigate direct and indirect impacts to wildlife movement corridors and linkages to below a level of significance. Implementation of Mitigation Measure BIO-1 would reduce impacts to habitats that function as potential wildlife movement corridors and linkages through monitoring by a qualified biologist, including installation of protective fencing, a worker environmental education program, tree and vegetation clearance surveys, confirming SWPPP compliance, application of standard BMPs and requirements that address erosion and runoff, and wildlife entrapment avoidance. Implementation of Mitigation Measures BIO-2 through BIO-5 would reduce impacts to habitats that function as potential wildlife movement corridors and linkages by requiring California reg-legged frog avoidance and protection, pre-construction general nesting bird and raptor season surveys, roosting bat surveys, and acquisition of off-site mitigation credits for sensitive vegetation communities and

jurisdictional aquatic resource impacts. Implementation of Mitigation Measure BIO-7, Wildlife Corridors Avoidance, would reduce impacts to habitats that function as potential wildlife movement corridors and linkages through the installation of permanent wildlife corridor avoidance fencing along the perimeter of the project impact area. With implementation of Mitigation Measures BIO-1 through BIO-5 and BIO-7, project impacts to wildlife movement corridors and linkages would be less than significant.

Cumulative projects would have the potential to result in a cumulative impact associated with wildlife movement corridors and habitat linkages. For example, the Ritz-Carlton hotel would occur in an undeveloped area adjacent to the Napa River and have the potential to impact a regional wildlife movement corridor and habitat linkage. However, cumulative projects would be required to comply with applicable federal and state regulations, such as the California Natural Community Conservation Planning Act, which supports the continued provision of wildlife movement corridors. If potentially significant impacts would occur from a cumulative project, then mitigation measures would be implemented to reduce impacts to the extent feasible.

With implementation of Mitigation Measures BIO-1 through BIO-5 and BIO-7, development of the proposed project would result in less than significant impacts to wildlife corridors or habitat linkages. Cumulative projects would also be required to incorporate project-specific mitigation measures to mitigate potential impacts to wildlife corridors or habitat linkages to below a level of significance. Therefore, the project would not contribute to a cumulatively considerable impact to wildlife corridors or habitat linkages.

e. Would the project conflict with any applicable policies protecting biological resources?

Less Than Significant with Mitigation Incorporated. The Natural Resources Conservation Element in the City of Napa General Plan (City of Napa 2022) includes several goals and policies relating to biological resources in the survey area:

- **Goal NRC-1.** Manage natural resources, including riparian corridors, wetlands, and open space areas in and around the city to preserve and enhance plant and wildlife habitats.
  - **Policy NRC-1-1.** Continue efforts to protect and enhance the riparian habitat along waterways in the City and the Napa River.
  - **Policy NRC-1-2.** Review future waterway improvement projects (e.g., flood control, dredging, private development), as well as all development adjacent to the waterways, to protect and minimize effects on the riparian and aquatic habitats.
  - **Policy NRC-1-5.** Promote controlled access points in designated areas to prevent unrestricted public access to riparian habitat.
  - **Policy NRC-1-7.** Identify and protect wildlife habitat corridors from being severed or significantly obstructed. Prioritize the re-establishment of disconnected habitat

corridors wherever feasible, including in conjunction with stormwater management improvements.

  - **Policy NRC-1-8.** Require development projects to provide protection for significant on-site natural habitat whenever feasible and protect significant species and groves or clusters of trees on project sites. Establish and support citywide training and support programs that provide the tools to help existing homeowners associations and residents accomplish habitat protection.

- **Goal NRC-2**. Recognize and support the preservation of rare, endangered, and threatened species.

  - **Policy NRC-2-2.** As part of development review on sites with sensitives species, require project proponents to either conserve any habitat areas, or identify any feasible means of avoiding any net loss of habitat or habitat value for endangered, threatened, and rare species. Establish programs that provide for the use of off-site mitigation when in the best interest of the public.

The project would comply with local policies and ordinances protecting biological resources in the City of Napa 2040 General Plan Natural Resources Conservation Element (City of Napa 2022) and City of Napa Protected Native Tree Program.

As discussed in Section 2.4.4(a), the project's potential impacts to sensitive wildlife species are potentially significant before implementation of mitigation measures. However, with implementation of Mitigation Measures BIO-1 through BIO-5, impacts to sensitive wildlife species would be mitigated to a less than significant level. With implementation of these mitigation measures, the project would not conflict with the City of Napa 2040 General Plan Natural Resources Conservation Element Goal NRC-1, Policy NRC-1-8, regarding protection of sensitive wildlife species in the City.

As discussed in Section 2.4.4(b), the project's potential impacts to sensitive vegetation communities are potentially significant before implementation of mitigation measures. However, with implementation of Mitigation Measures BIO-1 and BIO-4, impacts to sensitive vegetation communities would be mitigated to a less than significant level. With implementation of these mitigation measures, the project would not conflict with the City of Napa 2040 General Plan Natural Resources Conservation Element Goal NRC-1, Policy NRC-1-1, Policy NRC-1-2, Policy NRC-1-5, Policy NRC-1-8, Goal NRC-2, and Policy NRC-2-2 regarding protection of sensitive vegetation communities in the City.

As discussed in Section 2.4.4(c), the project has been designed to avoid impacts to jurisdictional aquatic resources to the greatest extent feasible. Remaining impacts to potentially jurisdictional aquatic resources would be mitigated through implementation of Mitigation Measures BIO-1, BIO-4, and BIO-6. Therefore, the project would comply with the City of Napa 2040 General Plan

Natural Resources Conservation Element Goal NRC-1, Policy NRC-1-1, and Policy NRC-1-2, regarding protection and avoidance of aquatic resources in the City.

As discussed in Section 2.4.4(d), the project's potential impacts to wildlife corridors and habitat linkages are potentially significant before implementation of mitigation measures. However, with implementation of Mitigation Measures BIO-1 through BIO-5 and BIO-7, impacts to wildlife corridors and habitat linkages would be mitigated to a less than significant level. With implementation of these mitigation measures, the project would not conflict with the City of Napa 2040 General Plan Natural Resources Conservation Element Goal NRC-1, Policy NRC-1-7, Policy NRC-1-8, Goal NRC-2, and Policy NRC-2-2 regarding avoidance and protection of wildlife corridors and habitat linkages in the City.

The City's Protected Native Tree Program (Napa Municipal Code, Section 12.45) prohibits the removal or pruning of protected native trees without a permit from the City. Applications are reviewed by City staff to determine whether they may be considered by the Planning Commission or City Council as part of a discretionary development application or if the application will need to be brought before the Parks, Recreation and Trees Advisory Commission for a final determination. The Protected Native Tree Program designates as "protected" specific species of trees located on private property one acre in size or larger, zoned for residential or agricultural purposes, or located on property zoned for commercial or industrial purposes. Protected tree species include black oak (*Quercus kelloggii*) 12 inches or greater, black walnut (*Juglans hindsi*) 12 inches or greater, blue oak (*Quercus douglasii*) 6 inches or greater, California bay 12 inches or greater, coastal live oak 12 inches or greater, coast redwood (*Sequoia sempervirens*) 36 inches or greater, and valley oak 12 inches or greater. The project is subject to the City's Protected Native Tree Program and would require obtaining applicable permits for tree removal. Approximately eight existing trees would be removed to facilitate the proposed development. With implementation of Mitigation Measures BIO-1 (item 6), which includes obtaining tree removal permits in compliance with the City's Protected Native Tree Program, the proposed project would not result in a conflict with the City's Protected Native Tree Program.

Implementation of the project would not result in conflicts with any local policies or ordinances protecting biological resources, and impacts would be less than significant with mitigation incorporated.

Cumulative projects would be required to comply with applicable local policies or ordinances. If potentially significant impacts would occur from cumulative projects, then mitigation measures would be implemented to reduce impacts to the extent feasible. With implementation of Mitigation Measures BIO-1 through BIO-7, the proposed project would comply with local policies and ordinances protecting biological resources in the City of Napa 2040 General Plan Natural Resources Conservation Element. Therefore, the project, in combination with other cumulative projects, would not contribute to a cumulatively considerable impact.

f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other applicable habitat conservation plan?

No Impact. The project site is not within an area that is covered by an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state Habitat Conservation Plan. Therefore, implementation of the project would not conflict with a Regional Conservation Plan and no mitigation is required.

Given that no impact would occur, the project, in combination with other cumulative projects, would not contribute to a cumulatively considerable impact related to conflicts with regional conservation plans.

Mitigation Measures

The following mitigation is required as part of the project to ensure that potential biological resources impacts are mitigated to levels that are less than significant.

BIO-1: **Qualified Biologist.** To prevent inadvertent disturbance to areas outside the limits of construction, all activities shall be monitored by an approved biologist. Prior to the start of construction, the City of Napa shall retain a qualified biological monitor who shall be on site during clearing, grubbing, trenching, and/or initial ground disturbance. The qualified biologist shall attend all pre-construction meetings and monitor all clearing, grubbing, trenching, and/or initial ground disturbance activities on the project site. The qualified biologist shall monitor these activities to ensure compliance with the appropriate standard conditions and mitigation measures, including the following:

1. **Resource Marking/Protection:** Prior to clearing and grading operations or other activities involving significant soil disturbance, the construction contractor shall install fencing (solid silt fencing) along the perimeter of the construction area, 6 inches below grade and 3 feet above grade, with wooden stakes at intervals of not more than 12 feet. Prominently colored, well-installed fencing or flagging and signage shall be in place wherever the limits of grading are adjacent to sensitive vegetation communities or other biological resources, as identified by the qualified biologist. Fencing/flagging shall remain in place and be maintained to ensure proper functioning throughout the duration of construction, and shall be shown on grading plans. No construction access, parking, or storage of equipment or materials shall be permitted outside the marked construction perimeter.
2. **Worker Environmental Education Program:** A worker environmental education program shall be implemented for all workers and subcontractors and shall include a description of environmental restrictions relevant to construction and the penalties for violations. A chain of command and protocol for communicating problems or potential construction changes that may affect biological resources shall be

established with the contractor and the City of Napa. Workers shall be made aware of the sensitive resources requiring protection using photographs or on-the-ground demonstrations. Specifically, the training shall include a description of California red-legged frog and its habitat, as well as measures to protect the species.

3. **Tree Clearance Survey:** Prior to the issuance of any permit to allow for the removal or demolition of trees within the project impact area, the qualified monitoring biologist shall conduct clearance surveys to flush out any wildlife species nesting, roosting, or otherwise occupying the trees or structures. If wildlife species are encountered within any of the trees or structures (outside the general bird nesting season), the qualified monitoring biologist shall remove them, if possible, or provide them with a means of escape and allowed the species to disperse. For measures specific to nesting birds and tree-roosting bats, Mitigation Measures BIO-3, General Bird Breeding Season Surveys, and BIO-5, Roosting Bats, shall be implemented.
4. **Vegetation Clearing and Initial Ground Disturbance:** The qualified biologist shall be on site during any clearing of natural vegetation (i.e., trees, shrubs, or annual ground cover) and initial ground disturbance. The qualified biologist shall flush wildlife species (i.e., bird or other mobile species) from occupied habitat areas immediately before brush clearing and initial ground disturbance activities. The qualified biologist shall be authorized to halt all associated project activities that may impact sensitive wildlife species.
5. **Stormwater Pollution Prevention Plan Compliance:** The qualified biologist shall periodically monitor construction activities throughout construction to verify that the construction site is implementing the Stormwater Pollution Prevention Plan prepared for the project and the following best management practices:
    a. Dust-control fencing
    b. Removal of construction debris and a clean work area
    c. Covered trash receptacles that are wildlife- and weather-proof
    d. Prohibition of pets on the construction site
    e. Maintenance of a speed limit of 15 miles per hour
    f. Use of water truck to spray vegetated areas in dust drift radius to prevent accumulation of dust
6. **Protected Native Tree Program Compliance:** The qualified biologist shall review the specific species and sizes of trees required to be removed for the project. The qualified biologist shall prepare the appropriate application(s) for permit(s) to be approved by the Director of the Parks & Recreation Services Department and shall include a plan describing each protected native tree on the property, its species, size, drip line area, and location. The location of all other trees on the site and in the adjacent public right-of-way and trees located on adjacent property with drip

lines over the property shall be shown on the plan and identified by species. The qualified biologist shall include such other information as the Director of the Parks & Recreation Services Department may determine is necessary to further the purposes of the City's Protected Native Tree Program including, but not limited to, photographs and arborist reports.

7. **Cover Trenches:** Construction personnel shall ensure that cover and/or escape routes for wildlife from excavated areas are provided daily. All steep trenches, holes, and excavations during construction shall be covered at night with backfill, plywood, metal plates, or other means, and if plastic sheeting is used, the edges must be covered with soils such that small wildlife cannot access the excavated hole. Soil piles shall be covered at night to prevent wildlife from burrowing in. The edges of the sheeting shall be weighed down by sandbags. These areas may also be fenced to prevent wildlife from gaining access. Exposed trenches, holes, and excavations shall be inspected twice daily (i.e., each morning and before sealing the exposed area) by the qualified biologist to monitor for wildlife entrapment. Excavations shall provide an earthen ramp to allow for a wildlife escape route. The qualified biologist shall verify each day that the contractor has covered all steep-walled trenches or excavations prior to the end of construction. If wildlife species are encountered within any trenches or excavated areas, the qualified biologist shall remove them, if possible, or provide them with a means of escape (e.g., a ramp or sloped surface at no greater than a 30-degree angle) and allow them to disperse. In addition, the qualified biologist shall provide training to construction personnel to increase awareness of the possible presence of wildlife beneath vehicles and equipment and to use best judgment to avoid killing or injuring wildlife (refer to item 2 in Mitigation Measure BIO-2).

BIO-2: California Red-legged Frog Avoidance and Protection. To avoid unlawful "take" of California red-legged frog, the following California red-legged frog avoidance and protection measures shall be implemented prior to and during project construction activities:

1. Prior to the start of construction, the City of Napa shall retain a qualified biologist approved by U.S. Fish and Wildlife Service and California Department of Fish and Wildlife to monitor for California red-legged frog.
2. Prior to initial ground disturbance, the California red-legged frog biologist shall confirm the areas to be protected with exclusion fencing (requirements specified in item 1 in Mitigation Measure BIO-1) are adequate to prevent California red-legged frog from entering the construction site.
3. If feasible, construction activities in and adjacent to the aquatic resources shall take place during the dry season and before the first rain of the season, especially vegetation removal.

4. Work during the nighttime or rain events when California red-legged frog is generally more active shall be avoided to the greatest extent feasible. Weather forecasts from the National Weather Service shall be consulted at least 72 hours prior to performing work during the wet season.
5. During vegetation removal in or adjacent to the aquatic resources, with the authorization of the U.S. Fish and Wildlife Service and California Department of Fish and Wildlife, the California red-legged frog biologist shall be present (or on call) to relocate California red-legged frog as needed. The California red-legged frog biologist shall have the authority to stop work that may result in the "take" of California red-legged frog. The biologist shall thoroughly check all vegetation for California red-legged frog prior to vegetation removal activities.
6. The California red-legged frog biologist or construction monitor shall check under all equipment for California red-legged frog and other wildlife before use. If any California red-legged frog are observed under equipment or within the work area, the California red-legged frog biologist shall relocate it to suitable habitat outside of the construction site.

BIO-3: General Bird Breeding Season Surveys. No grubbing, trimming, or clearing of vegetation from the project site shall occur during the raptor and bird breeding season (January 15 through September 1). If grubbing, trimming, or clearing of vegetation cannot feasibly occur outside the general bird breeding season, a qualified biologist shall perform a pre-construction nesting bird survey no more than 72 hours prior to the start of vegetation grubbing, trimming, or clearing to determine if active bird nests are present in the project site. Should an active bird nest be located, the qualified biologist shall establish a buffer and direct vegetation clearing or other construction activities away from the nest until it has been determined that the young have fledged or the nest has failed. If no nesting birds (including nest building or other breeding or nesting behavior) are in the construction area, grubbing, trimming, or clearing shall proceed.

BIO-4: Sensitive Vegetation Communities and Jurisdictional Aquatic Resources Mitigation. Any direct impacts to sensitive vegetation communities or jurisdictional aquatic resources would require mitigation to comply with state and/or federal authorizations, in accordance with the minimum ratios described in the following table (Mitigation Ratios for Potential Impacts to Sensitive Vegetation Communities and Jurisdictional Aquatic Resources within the Project Impact Area), as well as the ratios defined in any state and/or federal permit(s) issued for the project.

Mitigation Ratios for Potential Impacts to Sensitive Vegetation Communities and Jurisdictional Aquatic Resources within the Project Impact Area

Vegetation Community	Potential Jurisdiction	Minimum Mitigation Ratio
Non-Vegetated Channel	USACE/RWQCB/CDFW	2:1
Vernal Marsh	USACE/RWQCB/CDFW	2:1
Coast Live Oak Woodland	CDFW	1:1

CDFW = California Department of Fish and Wildlife; Regional Water Quality Control Board = RWQCB; U.S. Army Corps of Engineers = USACE

Potential direct impacts to sensitive vegetation communities, including jurisdictional aquatic resources, resulting from project implementation shall be mitigated through the acquisition of mitigation bank credits via a resource agency-approved mitigation site within the Napa River Watershed or by acquisition of other approved off-site mitigation credits. Prior to implementation of project construction impacts that would require compensatory mitigation, documentation demonstrating the availability of mitigation credits (i.e., credit ledger) at the approved mitigation site must be submitted to the City of Napa for confirmation.

BIO-5: **Roosting Bats.** An evening exit count survey should be conducted for the coast live oaks and other trees in the project impact area prior to removal due to the presence of suitable roosting habitat for sensitive tree-roosting bats. It is recommended that the single exit count survey be conducted within a 14-day window prior to tree removal starting at 30 minutes before sunset and ending 1 hour after sunset. If bats are observed exiting the coast live oak woodland impact area, then a suitable mitigation plan to humanely exclude the bats from trees planned for removal would be recommended. Such a plan may also involve providing alternative bat roosting habitat in the form of artificial bat houses on or near the site.

Additionally, if tree-roosting bat species that are difficult to detect (i.e., western red bat) are suspected, then prior to the removal of trees in the project impact area, a qualified biologist shall conduct clearance surveys to attempt to flush out any roosting bat species in trees. This shall include tapping on the trees to encourage the bats to flush and exit. To allow any that have not been flushed to escape, tree removal shall start slowly by gently pushing the tree over with heavy equipment. Smallest trees should be pushed over or removed first, or the lowest branches on large trees should be cut first to give roosting bats a chance to escape unharmed.

BIO-6: **Aquatic Resources Permitting.** Prior to the issuance of land development permits, including clearing or grubbing and grading permits that impact potentially jurisdictional waters of the United States and state, the project applicant shall obtain regulatory permits from the U.S. Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife under Sections 401 and 404 of the federal Clean Water Act, Porter-Cologne Water Quality Act, and Section 1602 of the California Fish and Game Code. Regulatory agency permits would include compensatory mitigation for impacts and a Compensatory Mitigation Plan prior to the start of construction that would ensure that no net loss of resources would result from implementation of the project. Compensatory Mitigation Plan shall be prepared to the satisfaction of the City of Napa, U.S. Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife for impacts prior to the start of construction. The Compensatory Mitigation Plan shall include, at a minimum, an implementation plan, estimated completion time, and any relevant contingency measures.

Areas under the jurisdictional authority of the U.S. Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife shall be delineated on all grading plans. Jurisdictional aquatic resources outside of the project impact area shall be flagged for avoidance, consistent with Mitigation Measure BIO-1.

BIO-7: **Wildlife Corridors Avoidance**. Prior to the completion of construction activities, the construction contractor, with guidance from the qualified biologist, shall install permanent avoidance fencing along the perimeter of the project site. The fencing shall consist of materials and design that would not limit wildlife movement through the area (i.e., split-rail fencing). The installation of visual/physical barriers (such as appropriate native vegetation) may also be installed to discourage human encroachment into undeveloped areas outside the project site. A qualified biologist or restoration ecologist familiar with native plant species must review and approve of any plant species proposed to be installed for this purpose. In addition, educational signage shall be posted at a minimum of 100-foot intervals along the perimeter fencing that identifies the areas outside the park as important wildlife movement corridors and entry by humans or pets is prohibited. The perimeter fencing and signage shall remain in place and be maintained in perpetuity by the project applicant with oversight by the City of Napa.

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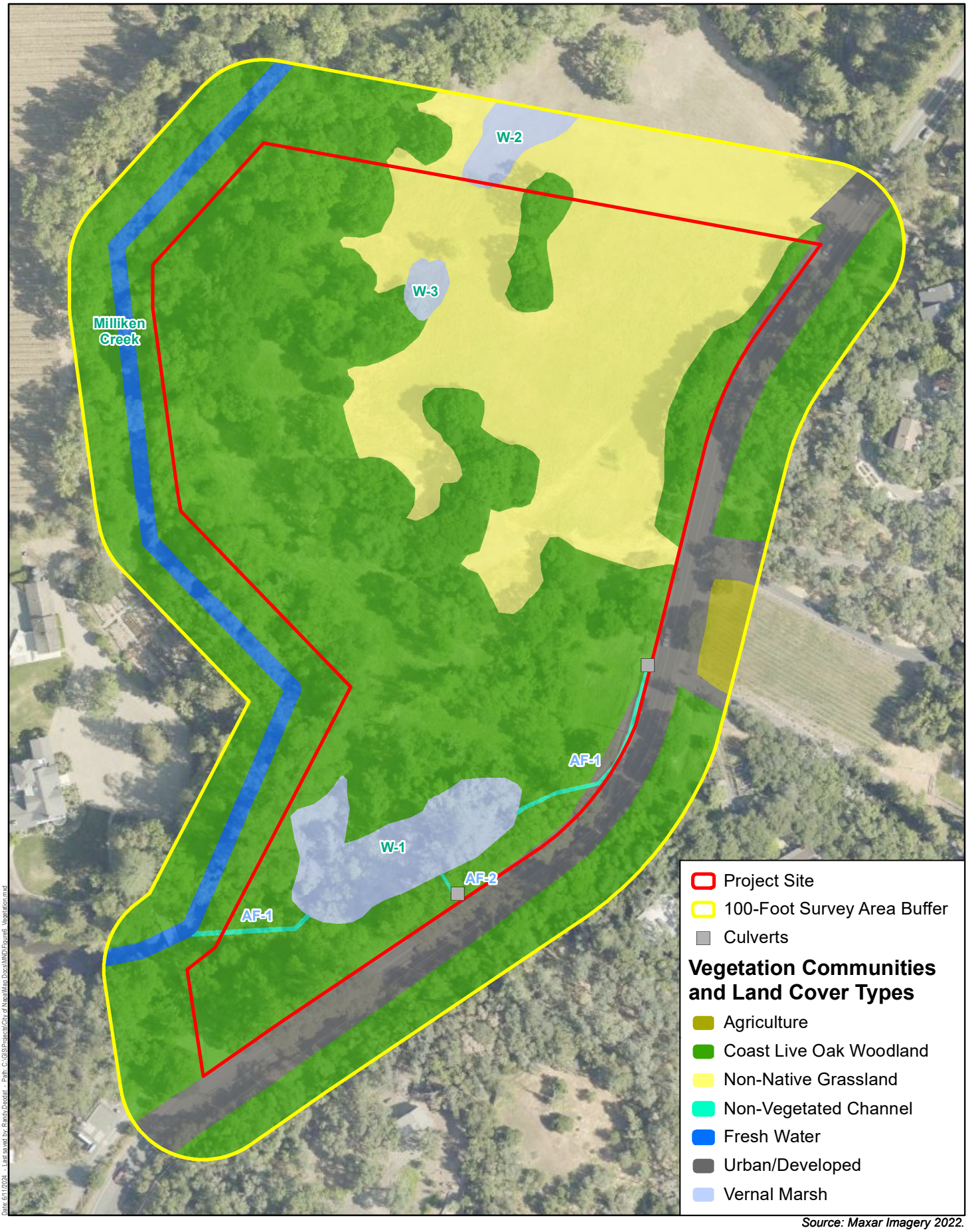

Source: Maxar Imagery 2022.

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Figure 6

Vegetation Communities and Land Cover Types

The Grange Campground

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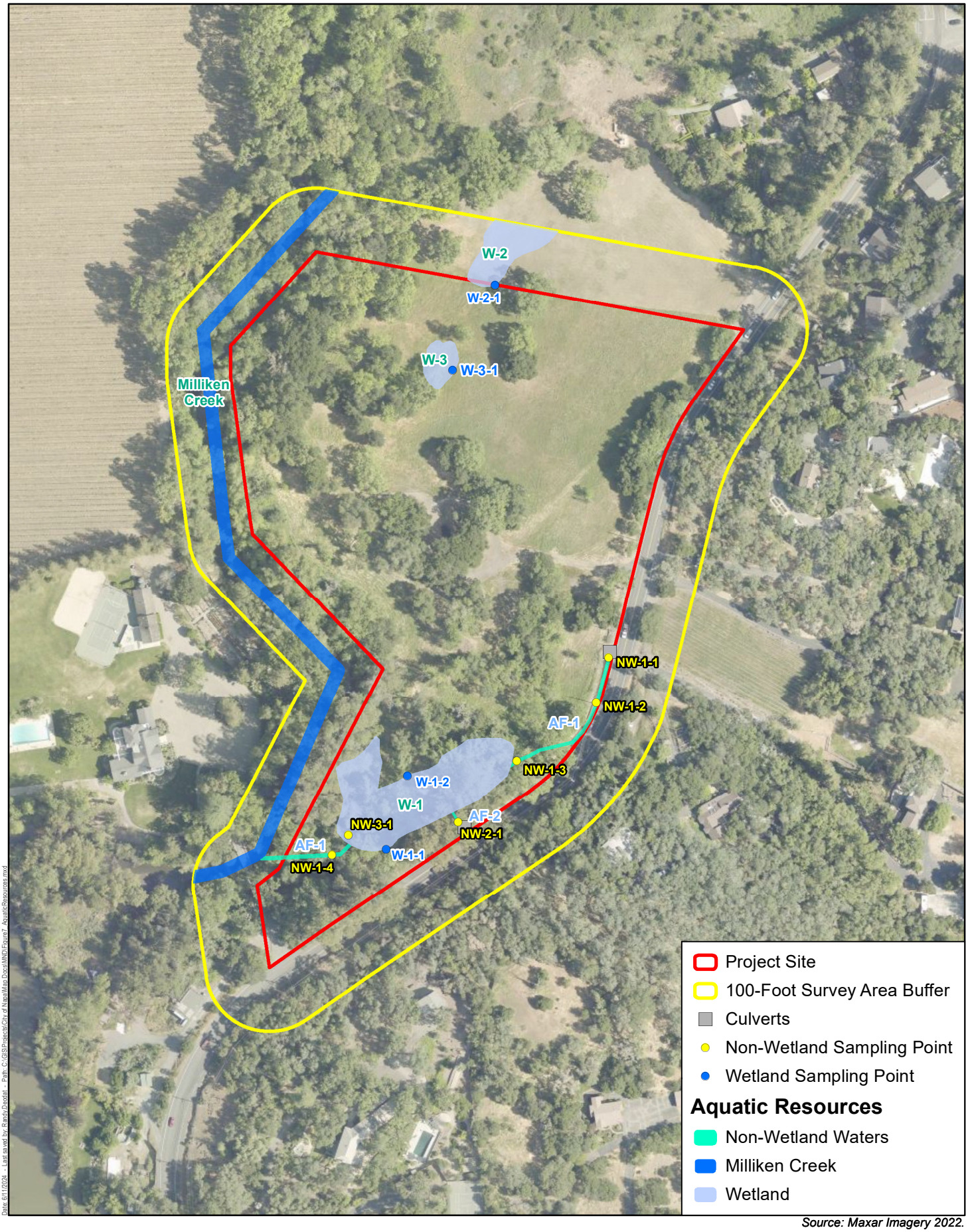

Source: Maxar Imagery 2022.

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Figure 7

Aquatic Resources

The Grange Campground

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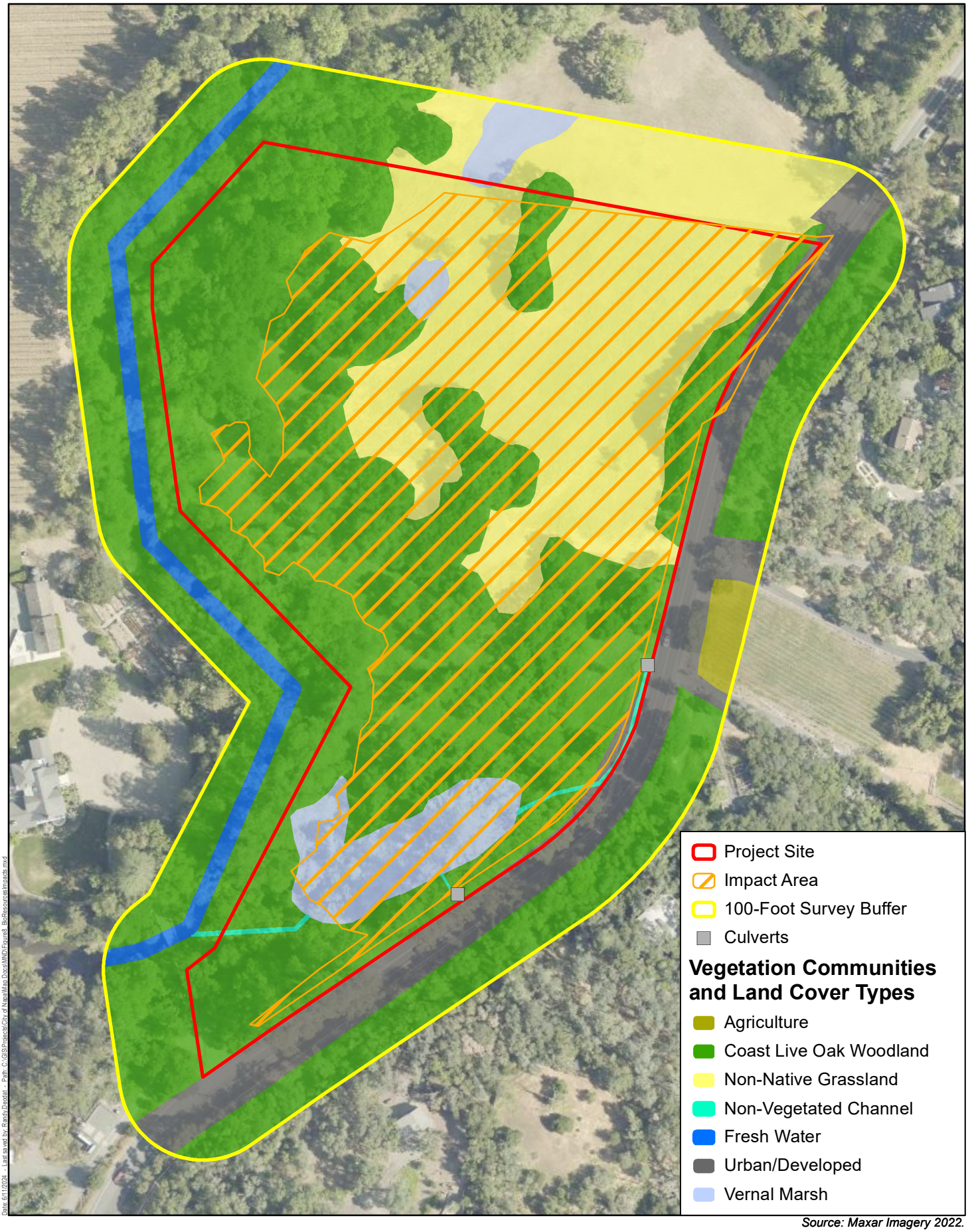

Source: Maxar Imagery 2022.

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Figure 8

Impacts to Biological Resources

The Grange Campground

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2.4.5 Cultural Resources

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

Environmental Setting

A Cultural Resource Survey Report was prepared for the project by Harris & Associates, dated August 2024 (Appendix C, Cultural Resource Survey Report) to identify any cultural resources within the area of project effect, which includes the project site plus a 0.25-mile buffer. The Cultural Resource Survey Report included research of literature and record searches using the California Historic Resources Inventory System, in addition to an examination of historical aerial imagery. This information was used to identify previously recorded resources and determine the types of resources that might occur in the survey area.

A pedestrian field survey was conducted on March 22, 2023, to identify any unrecorded resources on the project site. The impact analysis below is based on the analysis and findings of the Cultural Resource Survey Report (Appendix C).

The City of Napa Policy Resolution No. 27 includes the City's standard conditions of project approval for all development projects, unless otherwise authorized by the City or superseded by subsequently adopted and more stringent requirements. The following measures related to cultural resources listed in Resolution No. 27 are applicable to the proposed project:

- If any archaeological materials or objects are unearthed during project construction, all work in the vicinity shall be immediately halted until a qualified archaeologist is retained by the City to evaluate the finds. Developer shall comply with all mitigation recommendations of the archaeologist prior to commencing work in the vicinity of the archaeological finds.

Impact Analysis

a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

Less Than Significant Impact. The records search prepared as part of the Cultural Resource Survey Report concluded that no historic resources have been recorded on the project site. The absence of historical resources found on the project site during the records search and field survey indicates that the potential for impacts to a historical resource is very low. Therefore, impacts would be less than significant.

Given that the proposed project is not anticipated to result in impacts to historical resources, and that none of the identified cumulative projects are located within the immediate vicinity (2,000 feet) of the project site, the proposed project would not contribute to a cumulatively considerable impact to historical resources.

b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Less Than Significant with Mitigation Incorporated. The records search prepared as part of the Cultural Resource Survey Report concluded that, while no historic resources have been recorded on the project site, six sites were previously recorded, and five historic addresses were previously identified within the area of project effect. Of the previously recorded sites, five are prehistoric, and one is multi-component. One resource (P-28-000928/CA-NAP-409) has been recorded on the project site. Site P-25-000928/CA-NAP-409 was identified on the project site, adjacent to Milliken Creek on the eastern side. The site is identified as a lithic scatter including obsidian flakes and one obsidian projectile point fragment. The lithic scatter included one obsidian projectile point fragment. The site was revisited in 2016, and no major changes were observed during that survey; however, brush clearing had occurred within the site area. Although the resource was never officially relocated, no artifacts were identified during the 2023 pedestrian survey. It is possible that the artifacts have been collected (pot hunted) by individuals accessing the property. Given the cultural sensitivity of the area and that the site is currently undeveloped, the Cultural Resource Survey Report recommended that archaeological monitoring be implemented during ground-disturbing activities associated with the proposed project. The City of Napa Policy Resolution No. 27 requires that if any archaeological materials or objects are unearthed during project construction, all work in the vicinity shall be immediately halted until a qualified archaeologist is retained by the City to evaluate the finds. Mitigation Measure CUL-1, Archaeological and Tribal Monitoring Program, outlines more specific measures to be taken in the event that any archaeological materials or objects are unearthed during project construction. Therefore, impacts would be less than significant with implementation of Mitigation Measure CUL-1.

Given that impacts to archaeological resources would be less than significant with implementation of Mitigation Measure CUL-1, and that none of the identified cumulative projects are located

within the immediate vicinity (2,000 feet) of the project site, the proposed project would not contribute to a cumulatively considerable impact to archaeological resources.

c. Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant Impact. Based on an analysis of records and a field survey of the property, it has been determined that the project is not likely to disturb any human remains because the project site does not include a formal cemetery or any archaeological resources that might contain interred human remains. In the unlikely event that human remains are encountered on site during earth-disturbing activities, the project would comply with state and federal laws and regulations regarding human remains (i.e., California Public Resources Code, Section 5097.98; CEQA Guidelines, Section 15064.5; and California Health and Safety Code, Section 7050.5). Therefore, potential impacts to disturbance of human remains would be less than significant.

Given that impacts related to disturbance of human remains would be unlikely and less than significant, and that none of the identified cumulative projects are located within the immediate vicinity (2,000 feet) of the project site, the proposed project would not contribute to a cumulatively considerable impact related to disturbance of human remains.

Mitigation Measures

The following mitigation is required as part of the project to ensure that potential archaeological resources impacts are mitigated to levels that are less than significant.

CUL-1: Archaeological and Tribal Monitoring Program. Prior to grading permit issuance, grading and excavation activities, and building permit issuance, the project applicant shall hire a City-approved archaeologist (Project Archaeologist) archaeologist to perform archaeological monitoring before, during, and after construction and a potential data recovery program during all earth-disturbing activities. The project applicant shall also retain a Tribal Monitor from the Yocha Dehe Wintun Nation to perform tribal monitoring during all earth-disturbing activities. If verified, an archaeological and tribal monitoring and recovery program shall be completed consisting of the following measures, which shall be included on project grading plans to the satisfaction of the City of Napa's Planning Department:

- Project Archaeologist: The Project Archaeologist is to be on site during earth-disturbing activities. The frequency and location of monitoring of native soils and the cutting of previously disturbed deposits will be determined by the Project Archaeologist. The Project Archaeologist monitor will evaluate fill soils to ensure that they are negative for cultural resources.
- Tribal Monitor: The Tribal Monitor shall be present during all grading and other earthwork activities. However, if progress is made on site, and it is clear that the likelihood of a resource being uncovered is minimal, the Tribal Monitor may decide

that they would no longer need to be on site, but available in the event a potential resource is later uncovered.

- Sensitivity Training. The Project Archaeologist and Tribal Monitor shall ensure that all on-site construction workers receive cultural sensitivity training from the Tribal Monitor prior to any ground disturbance activities.
- Inadvertent Discoveries. In the event that previously unidentified potentially significant cultural resources are discovered:
  - The Project Archaeologist has the authority to divert or temporarily halt ground disturbance operations in the area of the discovery to allow evaluation of potentially significant cultural resources.
  - At the time of discovery, the Project Archaeologist shall contact the City and culturally affiliated Tribes as identified in the Treatment Agreement and Preservation Plan.
  - All ground disturbance activities within 100 feet of the discovered cultural resources shall be halted until a meeting is convened between the Developer, the Project Archaeologist, and the Tribal representative(s) (as necessary) to discuss the significance of the find. Optionally, the City Archaeologist may attend the meeting to discuss the significance of the find. Construction activities shall not resume in the area of discovery until an agreement has been reached by all parties as to appropriate mitigation. Work shall be allowed to continue outside of the buffer area and shall be monitored.
  - Isolates and clearly non-significant deposits shall be minimally documented in the field. The isolates and/or non-significant deposits shall be reburied on site as identified in the Treatment Agreement and Preservation Plan.
  - Treatment and avoidance of the newly discovered resources shall be consistent with the Treatment Agreement and Preservation Plan entered into with the appropriate Tribes. This may include avoidance of the cultural resources through project design, in-place preservation of cultural resources located in native soils and/or reburial on the project property so they are not subject to further disturbance in perpetuity.
  - If cultural resources are identified, one or more of the following treatments, in order of preference, shall be employed:
    - Preservation in place of the cultural resources, if feasible. Preservation in place means avoiding the resources, leaving them in place where they were found with no development affecting the integrity of the resources.
    - Reburial of the resources on the project property. The measures for reburial shall include, at least, the following:

- Measures and provisions to protect the future reburial area from any impacts in perpetuity.
- Reburial shall not occur until all legally required cataloging and basic recordation have been completed, with the exception that sacred items, burial goods, and Native American human remains are excluded.
- Any reburial process shall be culturally appropriate.
- Listing of contents and location of the reburial shall be included in the confidential appendix of the Monitoring Report.
- The Monitoring Report shall be filed with the County under a confidential cover and is not subject to Public Records requests.

▪ If preservation in place or reburial is not feasible, a Research Design and Data Recovery Program shall be prepared by the Project Archaeologist in consultation with the culturally affiliated Tribe(s) and approved by the County Archaeologist prior to implementation. There shall be no destructive or invasive testing on sacred items, burial goods, and Native American human remains. Results concerning finds of any inadvertent discoveries shall be included in the Monitoring Report.

- Human Remains. Upon identification of human remains, the Property Owner or their representative shall contact the County Coroner and the City Archaeologist. No further disturbance shall occur in the area of the find until the County Coroner has made the necessary findings as to origin. If the human remains are to be taken off site for evaluation, they shall be accompanied by an appropriate Native American monitor.
  - If the remains are determined to be of Native American origin, the Native American Heritage Commission shall immediately contact the most likely descendant.
  - The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the most likely descendant regarding their recommendations as required by Public Resources Code, Section 5097.98, has been conducted.
  - The most likely descendant may, with the permission of the landowner, or their authorized representative, inspect the site of the discovery of the Native American human remains and may recommend to the owner or the person responsible for the excavation work means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The descendants shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site.
    - Public Resources Code, Section 5097.98; CEQA Guidelines, Section 15064.5, and California Health and Safety Code, Section 7050.5, shall be followed in the event that human remains are discovered.

- Tribal Cultural Resources. Tribal monitoring would be required during project construction activities. If Tribal Cultural Resources are discovered, the Project Archaeologist and Tribal Monitor shall conduct consultation with culturally affiliated Tribes to determine the most appropriate mitigation. Should the two parties not be able to reach consensus, then the City Archaeologist shall consider the concerns of the culturally affiliated Tribe and the Project Archaeologist, and the Planning Division – Community Development Director shall make a final decision regarding appropriate mitigation.
- Fill Soils. The Project Archaeologist shall evaluate fill soils to determine that they are clean of cultural resources.
- Monthly Reporting. The Project Archaeologist shall submit monthly status reports to the Planning Division – Community Development Director starting from the date of the Notice to Proceed to termination of implementation of the Archaeological and Tribal Monitoring Program. The report shall briefly summarize all activities during the period and the status of progress on overall plan implementation. Upon completion of the implementation phase, a final report shall be submitted describing the plan compliance procedures and site conditions before and after construction.
- Monitoring Report. Upon completion of Rough Grading, a monitoring report shall be prepared identifying whether resources were encountered. A copy of the Monitoring Report shall be provided to the South Coastal Information Center and any culturally affiliated Tribe who requests a copy. Archaeological monitoring logs showing the date and time that the monitor was on site must be included in the Monitoring Report.
- Final Report. A final report shall be prepared substantiating that earth-disturbing activities are completed and whether cultural resources were encountered. A copy of the final report shall be submitted to the South Coastal Information Center, and any culturally affiliated Tribe who requests a copy.
  - Cultural Material Conveyance. Evidence that all Native American cultural materials in order of preference have been conveyed as follows:
    1. Evidence that all prehistoric materials collected during the Archaeological and Tribal Monitoring Program have been reburied; or
    2. Evidence that all prehistoric materials collected during the Archaeological and Tribal Monitoring Program have been repatriated to a Native American group of appropriate Tribal affinity. Evidence shall be in the form of a letter from the Native American Tribe to whom the cultural resources have been repatriated identifying that the archaeological materials have been received.
- Evidence that all historic cultural materials have been conveyed as follows:
  - Historic materials shall be curated at a Napa Valley curation facility and shall not be curated at a Tribal curation facility or repatriated. The collections and associated

records, including title, shall be transferred to the Napa Valley curation facility and shall be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility stating that the historic materials have been received and that all fees have been paid.

2.4.6 Energy

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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

The applicable plans related to energy are the CARB 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) and the Napa General Plan.

CARB 2022 Scoping Plan

The 2022 Scoping Plan lays out the sector-by-sector roadmap for California to achieve carbon neutrality by 2045 or earlier. The 2022 Scoping Plan outlines a technologically feasible, cost-effective, and equity-focused path to achieve the state's climate target. There have been three previous Scoping Plans. Previous plans have focused on specific GHG reduction targets for industrial, energy, and transportation sectors. The 2022 Scoping Plan, addressing recent legislation and direction from Governor Newsom, extends and expands upon earlier plans with a target of reducing anthropogenic GHG emissions to 85 percent below 1990 levels by 2045 (CARB 2022).

The 2022 Scoping Plan accelerates carbon reduction programs that have been in place for a decade and a half. This plan highlights moving to zero-emission transportation; electrifying cars, buses, trains, and trucks, and phasing out the use of fossil fuels used for heating our homes and buildings while providing communities with sustainable options for walking, biking, and public transit to reduce reliance on cars. The 2022 Scoping Plan also emphasizes continuing the build out of solar arrays, wind turbine capacity, and other resources that provide clean, renewable energy to displace fossil fuel-fired electrical generation, while also scaling up new options such as renewable hydrogen for hard-to-electrify end uses and biomethane where needed.

City of Napa

The City of Napa expands on the energy goals set forth in the state's 2022 Scoping Plan in its General Plan. The Napa General Plan's Climate Change and Sustainability Element outlines goals and policies to combat climate change and to further address adaptation and community resiliency, including energy efficiency and transition to carbon-free energy sources (City of Napa 2022). The City of Napa establishes policies for each goal set regarding Energy Generation and Security and Green Building.

Energy Generation and Security

- **Goal CCS-6:** Considering power shutdowns that affect the Napa community, promote sustainable energy generation practices, and further develop energy security that is resilient to wildfire and related climate disasters.
  - **CCS 6-1:** Establish programs to evaluate new projects on their contribution to community resiliency toward climate disasters.
  - **CCS- 6-3:** Incentivize solar panel deployment beyond the State's mandates. Establish guidance regarding the placement of solar panels to minimize impacts to aesthetic resources.
- **Goal CCS-7:** Implement programs and work with jurisdictional partners to increase sustainable energy production and energy security.
  - **CCS 7-6:** Partner with the County of Napa to implement an Assembly Bill (AB) 811 program that makes funding available to residential and commercial property owners seeking to improve their properties to conserve energy and water, and/or install solar systems to generate solar energy.
  - **CCS 7-10:** Incentivize the use of on-site renewable energy generation for new and existing buildings.

Green Building

- **Goal CCS-8:** Support the City's vision of a sustainable community by promoting efforts to reduce energy demand, reduce GHG emissions and conserve resources through improved building design.
  - **CCS 8-1:** Support use of the CALGreen to reduce energy demand and promote resource conservation through improve building design.
  - **CCS 8-3:** Encourage roofing designs and surface treatments (e.g., "cool roofs") that reduce the heat island effect of new development and support reduced energy use.

The 2022 California Building Code and California Green Building Standards Code (CALGreen) also include requirements for commercial developments relating to building energy efficiency and renewable energy.

Impact Analysis

a. Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less Than Significant Impact. The project would result in the use of electricity, propane, petroleum, and other consumption of energy resources during both the construction and operation phases of

the project; however, the consumption is not expected to be wasteful, inefficient, or unnecessary for the following reasons.

The proposed project would use only the amount of energy necessary for the construction and operation of the proposed "glamping" campground. No energy-intensive construction practices would be required beyond typical construction. All new construction would be required to comply with the 2022 California Energy Code or most recent version in effect at the time of construction, which ensures efficient building construction. Additionally, given the minimal site disturbance proposed in order to maintain the open space feel of the site, site grading, permanent structures, and paving would be limited.

Following construction, permanent structures would comply with the City's Green Building Ordinance, 2022 California Building Code, and CALGreen, as well as all other applicable federal and state regulations relating to energy efficiency. No natural gas service is proposed for the site, consistent with the 2022 Scoping Plan's emphasis on electrification. Fuel and energy use at camp sites would be limited to occupied sites and communal facilities. As discussed in Section 2.4.17, the project would be a locally serving recreational amenity, which would likely reduce VMT and associated fuel use. Likewise, campers utilizing the site would likely camp elsewhere if the site was not available, so the campground would result in a minimal net increase in energy use. Therefore, the construction and operation of the project are not expected to result in the wasteful or inefficient use of energy, and impacts would be less than significant.

Given that construction and operation of the project are not expected to result in the wasteful or inefficient use of energy, the proposed project would not contribute to a cumulatively considerable impact associated with the wasteful or inefficient use of energy. Furthermore, all cumulative projects would be designed and built in accordance with the City's Green Building Ordinance, 2022 California Building Code, and CALGreen, as well as all other applicable federal and state regulations relating to energy efficiency.

b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less Than Significant Impact. The project would comply with the 2022 California Building Code and CALGreen, as well as all other federal and state regulations relating to energy efficiency and renewable energy. Additionally, as discussed above, the project would not include natural gas use and would not increase VMT, consistent with 2022 Scoping Plan strategies. Further, with implementation of the proposed text amendment to the City of Napa Municipal Code (Appendix I, Text Amendment), the project does not include any components that would conflict with the City's General Plan policies. Therefore, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and impacts would be less than significant.

Given that the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, the proposed project would not contribute to a cumulatively considerable impact related to conflict with a state or local plan for renewable energy or energy efficiency. Furthermore, all cumulative projects would be required to comply with the 2022 California Building Code and CALGreen, as well as all other federal and state regulations relating to energy efficiency and renewable energy.

Mitigation Measures

The analysis completed for this section indicates that no significant impacts would result from the proposed project's implementation. As a result, no mitigation measures are required.

2.4.7 Geology and Soils

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☒	☐	☐

Environmental Setting

The topography on the project site is primarily flat, with a slight decrease in elevation along the western side of the project site. The elevation range on the project site ranges between 5 and 52 feet above mean sea level (Appendix B). The grading plan is provided in Appendix D, Grading and Site Plans.

The project site is underlain by Hambright rock-outcrop complex and Yolo loam (0 to 10 percent slopes) (USDA 2019). Hambright rock-outcrop complex (30 to 75 percent slopes) occurs on the majority of the project site. Yolo loam (0 to 10 percent slopes) occurs on the eastern edge of the project site. These soils are defined as well-drained and are not defined as hydric (wetland) soil types (USDA 2019).

The City of Napa Policy Resolution No. 27 includes the City's standard conditions of project approval for all development projects, unless otherwise authorized by the City or superseded by subsequently adopted and more stringent requirements. The following measures related to geology and soils listed in Resolution No. 27 are applicable to the proposed project:

- All project-related grading, trenching, backfilling, and compaction operations shall be conducted in accordance with the City of Napa Public Works Department Standard Specifications.
- All construction activities shall meet the Uniform Building Code regulations for seismic safety (i.e., reinforcing perimeter and/or load bearing walls, bracing parapets, etc.).
- Developer shall provide an erosion and sediment control plan and a schedule for implementation of approved measures to the Public Works Director for approval with the first improvement plans submitted for review. No grading and excavation shall be performed except in accordance with the approved plan and schedule.

Impact Analysis

a. Would the project 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?

Less Than Significant Impact. The project site is located between two mapped Alquist-Priolo Fault Zones, the West Napa Fault Zone and Green Valley Fault Zone (DOC 2022b). Therefore, the site could be subjected to moderate to severe ground shaking in the event of a major earthquake along either of these faults or other faults in the Bay Area region. The seismic risk at the project site is similar to that of the surrounding area.

The effects of seismic shaking can be reduced by adhering to the most recent edition of the California Building Code and current design parameters of the Structural Engineers Association of California. The project would be designed and constructed in compliance with the California Building Code design standards and the applicable standard measures listed in the City of Napa Policy Resolution No. 27 to ensure soil stability and proper engineering design of the proposed facilities, thus reducing potential impacts related to strong seismic ground shaking to a less than significant level. Additionally, the project would not include habitable built structures on site. Therefore, the project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault or strong seismic ground shaking, and impacts would be less than significant.

Given that the proposed project would not include habitable built structures on site, and that none of the identified cumulative projects are located within the immediate vicinity (2,000 feet) of the project site, the proposed project would not contribute to a cumulatively considerable impact related to the risk of loss, injury, or death involving rupture of a known earthquake fault or strong seismic ground shaking. Furthermore, all cumulative projects would be designed and built in accordance with the most recent California Building Code design standards and the applicable standard measures listed in the City of Napa Policy Resolution No. 27 to ensure soil stability and proper engineering design of the facilities.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction of cohesionless soils can be caused by strong vibratory motion due to earthquakes. Research and historical data indicate that loose, granular soils underlain by a near-surface groundwater table are most susceptible to liquefaction, while the stability of most silty sands and clays is not adversely affected by vibratory motion. Because of the dense nature of the soil materials underlying the site and the site being relatively flat, the potential for seismic-related ground failure, including liquefaction, at the site is considered low. The project site is not within a liquefaction zone identified by the DOC California Geological Survey (DOC 2022c).

The project would require the grading of 11,236 cubic yards, with approximately 121 cubic yards of cut and 11,115 cubic yards of fill, requiring import of 10,394 cubic yards. The project would be designed and constructed in compliance with the California Building Code design standards and the applicable standard measures listed in the City of Napa Policy Resolution No. 27 to ensure soil stability and proper engineering design of the proposed facilities, thus reducing potential impacts related to seismic-related ground failure to a less than significant level. Therefore, the project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction, and impacts would be less than significant.

Given that the project site is not within a liquefaction zone, and that the project would be designed and constructed in compliance with the California Building Code design standards and the applicable standard measures listed in the City of Napa Policy Resolution No. 27, the proposed project would not contribute to a cumulatively considerable impact related to the risk of loss, injury, or death involving seismic-related ground failure. Furthermore, all cumulative projects would be designed and built in accordance with the most recent California Building Code design standards and the applicable standard measures listed in the City of Napa Policy Resolution No. 27 to ensure soil stability and proper engineering design of the facilities.

iv. Landslides?

Less Than Significant Impact. According to DOC's Landslide Inventory (DOC 2015a), there is no indication of landslide deposits or landslide susceptibility at the area in and around the project site.

Further, the project site is relatively flat, and the project would maintain the relatively flat site. Therefore, direct and cumulative impacts would be less than significant.

b. Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. Construction of the project would require the grading of approximately 11,236 cubic yards, which has the potential to release sediment into downstream receiving waters (Milliken Creek and Napa River). However, the project would not result in substantial soil erosion or the loss of topsoil for the following reasons:

- The project would not alter existing drainage patterns and would not result in earthwork or construction activities in a significant drainage feature.
- A National Pollutant Discharge Elimination System (NPDES) General Construction Permit for stormwater discharges must be obtained from the State Water Resources Control Board (Region 2). The General Construction Permit requires preparation and implementation of a SWPPP and associated BMPs. BMPs would include erosion and sediment control, water flow dissipation, and off-site sediment tracking to prevent substantial soil erosion during construction (refer to Section 2.4.10).
- In accordance with the City of Napa Policy Resolution No. 27, an erosion and sediment control plan and a schedule for implementation of approved measures must be prepared and submitted to the Public Works Director for approval with the first improvement plans submitted for review. No grading and excavation would be performed except in accordance with the approved plan and schedule.
- A Stormwater Control Plan was prepared for the project by RSA Civil for the project (Appendix E). Runoff would be conveyed to vegetated areas from roof downspouts and surface flows, if any remain after infiltration from the parking lot areas and drive aisle. The natural topography of the site perimeters would not be modified, so the site would retain much of the water as it does currently.
- The project is required to incorporate post-development BMPs into the project design to mitigate impacts to water quality in accordance with the latest version of the Bay Area Stormwater Management Agencies Associated Post-Construction Water Quality Management Manual. Compliance with this manual would ensure compliance with the requirements, facilitate review of applications, and promote integrated Low Impact Development design, minimizing the potential for water and wind erosion.

Due to these factors, the project would not result in substantial soil erosion or the loss of topsoil, and impacts would be less than significant.

Furthermore, all cumulative projects that would disturb more than 1 acre would be required to obtain a NPDES Construction General Permit, comply with the from the State Water Resources Control Board (Region 2) and prepare and implement a SWPPP and associated BMPs. In addition,

all cumulative projects would be required to develop in accordance with the applicable requirements of the City of Napa Policy Resolution No. 27 and the latest version of the Bay Area Stormwater Management Agencies Associated Post-Construction Water Quality Management Manual, minimizing the potential for water and wind erosion. Therefore, the proposed project, in combination with other cumulative projects, would not contribute to a cumulatively considerable impact related to soil erosion or the loss of topsoil.

c. Would the project 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?

Less Than Significant Impact. The potential for lateral spreading, liquefaction, subsidence or seismically induced dynamic settlement at the site is considered low due to the dense nature of the soil materials underlying the site and because the site is relatively flat. As described in Section 2.4.7(a)(iv), there is no indication of landslide deposits or landslide susceptibility at the area in and around the project site. Further, the project would be designed and constructed in compliance with the California Building Code design standards and the applicable standard measures listed in the City of Napa Policy Resolution No. 27 to ensure soil stability and proper engineering design of the proposed facilities, thus reducing potential impacts related to an unstable geologic unit or soil to a less than significant level. Therefore, the project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslide, lateral spreading, subsidence, liquefaction, or collapse, and impacts would be less than significant.

Given that the project site is not within a liquefaction zone, there is no indication of landslide deposits or landslide susceptibility in and around the project site, and that the project would be designed and constructed in compliance with the California Building Code design standards and the applicable standard measures listed in the City of Napa Policy Resolution No. 27, the proposed project would not contribute to a cumulatively considerable impact related to the risk of loss, injury, or death involving landslide, lateral spreading, subsidence, liquefaction, or collapse. Furthermore, all cumulative projects would be designed and built in accordance with the most recent California Building Code design standards and the applicable standard measures listed in the City of Napa Policy Resolution No. 27 to ensure soil stability and proper engineering design of the facilities.

d. Would the project 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?

Less Than Significant Impact. According to the Biological Resources Technical Report (Appendix B) prepared for the project, the project site is underlain by Hambright rock-outcrop complex and Yolo loam (0 to 10 percent slopes), which are not considered expansive soils (USDA 2019). The project would be designed and constructed in compliance with the California Building Code design standards and the applicable standard measures listed in the City of Napa Policy Resolution No. 27 to ensure soil

stability and proper engineering design of the proposed facilities, thus reducing potential impacts related to geologic units or soils to a less than significant level. Therefore, the project would not create a substantial risk to life or property, and impacts would be less than significant.

Given that the project site is underlain by soils that are not considered expansive soils, the proposed project would not contribute to a cumulatively considerable impact related to direct or indirect risks to life or property involving expansive soil. Furthermore, all cumulative projects would be designed and built in accordance with the most recent California Building Code design standards and the applicable standard measures listed in the City of Napa Policy Resolution No. 27 to ensure soil stability and proper engineering design of the facilities.

e. Would the project 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?

No Impact. The project does not propose any septic tanks or alternative wastewater disposal systems. The project's wastewater would connect to sewer lines and facilities operated and maintained by the Napa Sanitation District. Therefore, the project would have no impact related to the use of septic tanks or alternative wastewater disposal systems.

Given that no impact would occur, the project would not contribute to a cumulatively considerable impact related to the use of septic tanks or alternative wastewater disposal systems.

f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant with Mitigation Incorporated. Impacts on paleontological resources occur when excavation activities encounter fossiliferous geological deposits and cause physical destruction of fossil remains. Fossil remains, fossil sites, fossil-producing geologic formations, and geologic formations with the potential for containing fossil remains are considered paleontological resources or have the potential to be paleontological resources. Fossil remains are considered important if they are well preserved, identifiable, type/topotypic specimens, age diagnostic, useful in environmental reconstruction, and/or represent new, rare, and/or endemic taxa. The potential for impacts on fossils depends on the sensitivity of the geologic unit and the amount and depth of grading and excavation.

According to the DOC Geologic Map of California (DOC 2015b), the project area is underlain with tertiary volcanic flow rocks with minor pyroclastic deposits, which have a low paleontological potential, and quaternary alluvium and marine deposits, which have a high paleontological potential. Therefore, it is assumed that the project site is considered sensitive for paleontological resources. The project would involve limited grading and excavation, which could result in the unanticipated discovery of paleontological resources during ground-disturbing activities, as well as the potential to damage or destroy paleontological resources that may be

present below the ground surface. Therefore, Mitigation Measure GEO-1 includes a Paleontological Data Recovery and Monitoring Plan as a condition of approval for the potential discovery of buried resources. With implementation of Mitigation Measure GEO-1, impacts related to paleontological resources would be less than significant.

Given that implementation of Mitigation Measure GEO-1 would mitigate potential impacts to a less-than-significant level, the proposed project would not contribute to a cumulatively considerable impact related to paleontological resources. Furthermore, all discretionary cumulative projects would be subject to CEQA and required to evaluate and, if necessary, mitigate potential impacts to paleontological resources.

Mitigation Measures

The following mitigation is required as part of the project to ensure that potential paleontological resources impacts are mitigated to levels that are less than significant.

GEO-1: Qualified Paleontologist and Paleontological Data Recovery and Monitoring Plan. Prior to grading permit issuance, grading and excavation activities, and building permit issuance, the project applicant shall hire a qualified paleontologist to verify that the geological deposits underlaying the project site have the potential to contain sensitive paleontological resources. A qualified paleontologist is defined as an individual who has a Master of Science or doctorate degree in paleontology or geology and who is a recognized expert in the identification of fossil materials and the application of paleontological recovery procedures and techniques. If verified, a paleontological monitoring and recovery program shall be completed consisting of the following measures, which shall be included on project grading plans to the satisfaction of the City of Napa's Planning Department:

1. The project applicant shall retain the services of a qualified paleontologist to conduct a paleontological monitoring and recovery program. As part of the monitoring program, a paleontological monitor may work under the direction of a qualified paleontologist. A paleontological monitor is defined as an individual having experience in the collection and salvage of fossil materials.
2. The qualified paleontologist shall attend the project pre-construction meeting to consult with the grading and excavation contractors concerning the grading plan and paleontological field techniques.
3. The qualified paleontologist or paleontological monitor shall be on site on a full-time basis during the original cutting of previously undisturbed portions of the underlying very old paralic deposits. If the qualified paleontologist or paleontological monitor

ascertains that the noted formations are not fossil-bearing, the qualified paleontologist shall have the authority to terminate the monitoring program.

4. If fossils are discovered, recovery shall be conducted by the qualified paleontologist or paleontological monitor. In most cases, fossil salvage can be completed in a short period of time, although some fossil specimens (such as a complete large mammal skeleton) may require an extended salvage period. In these instances, the paleontologist (or paleontological monitor) shall have the authority to temporarily direct, divert, or halt grading to allow recovery of fossil remains in a timely manner.
5. If subsurface bones or other potential fossils are found anywhere on the project site by construction personnel in the absence of a qualified paleontologist or paleontological monitor, the qualified paleontologist shall be notified immediately to assess their significance and make further recommendations.
6. Fossil remains collected during monitoring and salvage shall be cleaned, sorted, and cataloged. Prepared fossils, along with copies of all pertinent field notes, photographs, and maps, shall be deposited (as a donation) in a scientific institution with permanent paleontological collections, such as the Berkeley Natural History Museum.

Prior to building permit issuance, a final summary report outlining the results of the mitigation program shall be prepared by the qualified paleontologist and submitted to the City of Napa's Planning Division for concurrence. This report shall include discussions of the methods used, stratigraphic sections exposed, fossils collected, and significance of recovered fossils, as well as appropriate maps.

2.4.8 Greenhouse Gas Emissions

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a 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?	☐	☐	☒	☐

Environmental Setting

A GHG is any gas that absorbs infrared radiation and traps heat in the atmosphere. GHGs are produced from natural processes and human activities. The accumulation of GHGs in the atmosphere influences the long-term atmospheric temperatures and contributes to global climate change. In California, per Assembly Bill (AB) 32 (2016), GHGs are defined to include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride, plus chlorofluorocarbons and other chlorine- or bromine-containing gases. Hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride are synthetic, powerful GHGs that are emitted from a variety of industrial processes and the production of chlorodifluoromethane. Construction or operation of the project would not include any industrial processes, and chlorodifluoromethane has been mostly phased out of use in the United States, with the exception of feedstock production (USEPA 2023); therefore, these GHGs are not discussed further in this IS/MND. CO_2 accounts for the largest amount of GHG emissions, and collectively, CO_2, CH_4, and N_2O amount to 80 percent of the total radiative forcing from well-mixed GHGs (CARB 2014). For each GHG, a global warming potential has been calculated to reflect how long emissions remain in the atmosphere and how strongly each GHG absorbs energy on a per-kilogram basis relative to CO_2. For example, 1 pound of CH_4 has 25 times more heat-capturing potential than 1 pound of CO_2. To simplify reporting and analysis, GHG emissions in this analysis are reported in metric tons of CO_2 equivalent ($MTCO_2e$).

California has enacted a variety of legislation relating to climate change, much of which has set aggressive goals for GHG emissions reductions throughout the state. Most recently, AB 1279, the California Climate Crisis Act, was enacted in September 2022. The bill established a statewide goal to achieve net-zero GHG emissions by 2045 and to achieve and maintain net-negative GHG emissions thereafter. Similar to regional issues related to air quality, BAAQMD issues regional guidance for assisting local governments in reducing GHG emissions in accordance with statewide emissions reduction goals (BAAQMD 2023). The goals of the BAAQMD thresholds are in line with the previously discussed 2022 Scoping Plan, which aims to reduce anthropogenic emissions to 85 percent below 1990 levels by 2045 (CARB 2022).

The City of Napa also includes goals to reduce GHG emissions in its General Plan. A Climate Action Plan for the City of Napa is currently being drafted but has not been adopted. The Napa General Plan's Climate Change and Sustainability Element outlines the following goals and policies related to GHG reductions for new developments.

Climate Change and Greenhouse Gas Reduction

- **Goal CCS-1:** Further the City's sustainability initiative to reduce the community's GHG emissions and foster green development patterns in buildings sites and landscapes.
  - **CCS 1-1:** Implement immediate and sustained actions in support of achieving net-zero climate pollutants from public and private operations within the City by 2030.
  - **CCS 1-4:** Expand local awareness of actions that residents and businesses to reduce climate impacts. Develop an open data Community Climate Dashboard to engage residents in progress and accomplishments toward goals.
  - **CCS 1-5:** Collaborate with regional agencies and other partners to create a Climate Action Plan to address GHG reduction goals of Executive Order B-55-18, Senate Bill 32, Executive Order S-03-05, and City of Napa Resolution R2022-030.

Land Use and Mobility

- **Goal CCS-2:** Promote Napa as a network of interconnected neighborhoods with compact, walkable development patterns that are integrated with a sustainable mobility system that emphasizes walking, biking, or taking transit.
  - **CSS 2-1:** Support programs to reduce auto dependency and GHG emissions from personal vehicles. Efforts include:
    - Support programs to install bike racks in new developments and commercial areas.

The City of Napa maintains compliance with CALGreen regarding commercial developments. Section 15.04.090 of the Napa Municipal Code lists amendments the City has made to CALGreen Building Standards. The following amendments outline regulations regarding appliances and fixtures for commercial application:

- Ice makers are required to be air cooled or, if water-cooled, part of a closed loop cooling system.
- Food steamers must be connection-less or boiler-less.
- If water softeners are installed as part of a project, they shall comply with NSF/ANSI Standard 44 provisions, including the following features:
  - Demand-initiated regeneration system (not timeclock initiated),
  - Minimum salt efficiency of 3,350 grains total hardness per pound of salt, and
  - Generate a maximum of 5 gallons of water per 1,000 grains of hardness removed during service cycle.

Impact Analysis

a. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less Than Significant with Mitigation Incorporated. The BAAQMD 2022 CEQA Guidelines (BAAQMD 2023) provide recommended procedures for evaluating climate impacts during the environmental review process consistent with CEQA requirements for GHG emissions impacts. Although these thresholds are not required to be used by lead agencies and recommendations are non-binding, the CEQA Guidelines provide localized, evidence-based recommendations for meeting statewide emissions reduction goals. The City of Napa has not adopted a City-specific GHG threshold or a qualified plan for GHG reduction. As such, the BAAQMD thresholds are applicable for evaluating the significance of project GHG emissions.

The BAAQMD threshold for GHG emissions is intended to determine whether an individual project would contribute its "fair share" of actions needed to achieve statewide emissions reductions goals, including AB 1279. BAAQMD has identified necessary design elements for new land use projects that, if incorporated into the design and construction of a project, then the project is determined to contribute its "fair share" and project emissions would not result in a cumulatively considerable contribution to global climate change. Table 6, BAAQMD Thresholds of Significance for GHG Emissions, summarizes the thresholds of significance for operational project-level climate impacts from GHG emissions applicable to a new commercial or retail project, which is the designation that best represents the proposed project. The project's construction and operational impacts are addressed separately below.

Table 6. BAAQMD Thresholds of Significance for GHG Emissions

Sector	Required Project Design Elements
Buildings	The project will not include natural gas appliances or natural gas plumbing (in both residential and non-residential development).
	The project will not result in any wasteful, inefficient, or unnecessary energy use as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the CEQA Guidelines.
Transportation	The project will achieve a reduction in project-generated VMT below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted SB 743 VMT target that reflects the recommendations provided in OPR Technical Advisory: Evaluating Transportation Impacts in CEQA. For retail projects, the standard is no net increase in VMT.
	The project will achieve compliance with off-street EV requirements in the most recently adopted version of CALGreen Tier 2.

Source: BAAQMD 2023.

Notes: CALGreen = California Green Building Standards Code; CEQA = California Environmental Quality Act; EV = electric vehicle; OPR = Governor's Office of Planning and Research; SB = Senate Bill; VMT = vehicle miles traveled

Construction

Construction activities associated with the proposed project would result in short-term GHG emissions from heavy equipment and construction worker vehicles. BAAQMD has not adopted a

numerical threshold for construction GHG emissions. Rather, it recommends BMPs that should be incorporated in order for GHG emissions from construction to be less than significant. As these BMPs have not yet been incorporated into the City's Municipal Code, these BMPs are required in Mitigation Measure GHG-1. Therefore, this construction GHG impact would be less than significant with mitigation.

Operation

Following construction, operation of the proposed project would result in GHG emissions associated with vehicle trips, buildings (energy use), water consumption (energy embodied in potable water), solid waste management (including transport and landfill gas generation), and area sources (recreational fires). BAAQMD has determined that certain project features are required to determine whether a project is consistent with the region's "fair share" contribution to statewide emissions reduction goals. Per BAAQMD, for a new land use project to do its fair share to address the climate crisis and thus, for its GHG emissions to be less than significant, a project cannot include features that commit the development to ongoing GHG emissions for decades into the future. A project that includes design features that commit the development to GHG sources, without a clear path to reduce the emissions from those sources, prevents the State from achieving the climate goals. The required design elements applicable to the project are summarized above in Table 6.

As discussed in Section 2.4.6, Energy, the project would not result in any wasteful, inefficient, or unnecessary energy use. Additionally, the project would not include any natural gas use. The building design element related to natural gas does allow for tanked gas, such as propane, to serve some specialized on-site uses (i.e., for the communal fire pits) (BAAQMD 2023). As such, the communal propane fire pits would be consistent with this design element. Therefore, the project would comply with BAAQMD design features related to building design.

According to the Transportation Impact Study (TIS) prepared for the project by W-Trans (Appendix G), the project would have a less than significant impact on VMT because it would be a locally serving destination. It would provide a service to existing Napa residents that already drive to the area for camping activities. Additionally, the site is approximately 1.5 miles from downtown Napa, where patrons would be able to access restaurants and other destinations via short trips from the project site. A pedestrian path would also be constructed along the SR-121/Silverado Trail highway frontage, improving pedestrian access. New local-serving developments tend to shorten trips, and consequently reduce VMT, by improving destination proximity. As such, it is assumed that the proposed project meets the BAAQMD criteria for no net increase in VMT. Additionally, the project would provide electric vehicle (EV) charging stations. Therefore, the project would comply with the BAAQMD design features related to transportation. This operational GHG impact would be less than significant.

GHG emissions, and their associated contribution to climate change, are inherently a cumulative impact. Therefore, project-level impacts of GHG emissions are treated as cumulative impacts.

b. Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact. As described above, the City does not have an adopted plan for the purposes of reducing GHG emissions. As such, the 2022 Scoping Plan is the applicable adopted GHG plan (CARB 2022). The 2022 Scoping Plan lays out a path for the state to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels no later than 2045, as directed by AB 1279. The 2022 Scoping Plan does not include requirements for new development projects, but it does include recommendations for new development that focus on building and transportation electrification and VMT reduction. The BAAQMD threshold was developed to implement the 2022 Scoping Plan recommendations at the project level. As such, a project that is consistent with the BAAQMD threshold for GHG emissions would also be consistent with the 2022 Scoping Plan. As described above in Section 2.4.8(a), the project has incorporated applicable BAAQMD design features to reduce future operational GHG emissions. Therefore, this impact would be less than significant.

Mitigation Measures

Mitigation Measure GHG-1 would implement BMPs to reduce construction GHG emissions to a less than significant level.

GHG-1: Construction Best Management Practices to Reduce Greenhouse Gas Emissions. The construction contractor will be required to implement the following BMPs identified by the BAAQMD to reduce construction-related greenhouse gas (GHG) emissions during all phases of construction, as applicable and feasible. These requirements will be documented on construction plans and submitted to the City prior to obtaining a grading permit.

- Use zero-emission and hybrid-powered equipment to the greatest extent possible.
- Use U.S. Environmental Protection Agency (USEPA) Tier 4 Final-compliant engines or better for all diesel-fueled off-road construction equipment.
- Require all on-road heavy-duty trucks to be zero emissions or meet the most stringent emissions standard, such as model year (MY) 2024 to 2026, as a condition of contract.
- Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to no more than 2 minutes. Provide clear signage that posts this requirement for workers at the entrances to the site and develop an enforceable mechanism to monitor idling time to ensure compliance with this measure.
- Prohibit off-road diesel-powered equipment from being in the “on” position for more than 10 hours per day.

- Use CARB-approved renewable diesel fuel in off-road construction equipment and on-road trucks.
- Use USEPA SmartWay-certified trucks for deliveries and equipment transport.
- Require all construction equipment to be maintained and properly tuned in accordance with manufacturer's specifications. Equipment should be checked by a certified mechanic and determined to be running in proper condition prior to operation of the equipment.
- Where grid power is available, prohibit portable diesel engines and provide electrical hook ups for electric construction tools, such as saws, drills, and compressors, and using electric tools whenever feasible.
- Where grid power is not available, use alternative fuels, such as propane or solar electrical power, for generators at construction sites.
- Encourage and provide carpools, shuttle vans, transit passes, and/or secure bicycle parking to construction workers, and offer meal options on site or shuttles to nearby meal destinations for construction employees.
- Reduce electricity use in the construction office by using light-emitting diode (LED) bulbs, powering off computers every day, and replacing heating and cooling units with more efficient ones.
- Minimize energy used during site preparation by deconstructing existing structures to the greatest extent feasible.
- Recycle or salvage nonhazardous construction and demolition debris, with a goal of recycling at least 15 percent more by weight than the diversion requirement in Title 24.
- Use locally sourced or recycled materials for construction materials (goal of at least 20 percent based on costs for building materials and based on volume for roadway, parking lot, sidewalk, and curb materials). Wood products used should be certified through a sustainable forestry program.
- Use low-carbon concrete, minimize the amount of concrete used, and produce concrete on site if it is more efficient and lower emitting than transporting ready-mix.
- Develop a plan to efficiently use water for adequate dust control since substantial amounts of energy can be consumed during the pumping of water.
- Include all requirements in applicable bid documents, purchase orders, and contracts, with successful contractors demonstrating the ability to supply the compliant on- or off-road construction equipment for use prior to any ground-disturbing and construction activities.

2.4.9 Hazards and Hazardous Materials

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 Section 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, 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?	☐	☐	☒	☐

Environmental Setting

The California Health and Safety Code, Chapter 6.95, Section 25501(n)(1), defines a hazardous material as "any material that because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment." Thus, the term "hazardous material" is a broad term for all substances that may be hazardous, specifically including hazardous substances and hazardous waste. Substances that are flammable, corrosive, reactive, oxidizers, radioactive, combustible, or toxic are considered hazardous.

Impact Analysis

a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. Construction activities associated with the project would involve the use of chemical substances, such as solvents, paints, fuel for equipment, and other potentially hazardous materials. These materials are common to typical construction activities and do not pose a significant hazard to the public or the environment. Adherence to regulations, including federal and local regulations, and standard protocols during the storage, transportation, disposal, and use of any hazardous materials would minimize the hazard to the public or the environment during construction. The project would not result in a significant hazard to the public or environment because all storage, handling, transport, use, and disposal of hazardous substances during construction would be in full compliance with local, state, and federal regulations.

Long-term operation of the proposed "glamping" campground would not involve large quantities of hazardous materials. California Government Code, Section 65850.2, requires that no final certificate of occupancy or its substantial equivalent be issued unless there is verification that the owner or authorized agent has met, or is meeting, the applicable requirements of the California Health and Safety Code, Division 20, Chapter 6.95, Article 2, Sections 25500–25520. Project operation would not create a significant hazard to the public or the environment because it does not propose the storage, use, transport, use, or disposal of hazardous substances.

Therefore, due to the strict requirements that regulate hazardous substances and the fact that the initial planning, ongoing monitoring, and inspections would occur in compliance with local, state, and federal regulation, the project would not result in any potentially significant impacts related to the routine transport, use, and disposal of hazardous substances.

Given that construction and operation of the project would not result in any potentially significant impacts related to the routine transport, use, and disposal of hazardous substances, the proposed project would not contribute to a cumulatively considerable impact related to the routine transport, use, and disposal of hazardous substances. Furthermore, all cumulative projects would be required to comply with local, state, and federal regulations that regulate hazardous substances.

b. Would the project 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?

Less Than Significant Impact. As described above, storage, handling, transport, use, and disposal of hazardous substances during construction would be in full compliance with local, state, and federal regulations. Additionally, the project would not be located on a hazardous materials site (refer to Section 2.4.9[d]). Therefore, the project would not create a significant hazard to the public

or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Impacts would be less than significant.

As described in Section 2.4.9(a), the proposed project would not contribute to a cumulatively considerable impact related to the routine transport, use, and disposal of hazardous substances. Additionally, the project would not be located on a hazardous materials site and is located more than 2,000 feet from any of the identified cumulative projects within 2 miles of the project site. Therefore, the project, in combination with other cumulative projects, would not contribute to a cumulatively considerable impact resulting from reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact. No schools are within 0.25 mile of the proposed project site. The nearest school to the project site is Mc Pherson Elementary School, approximately 0.89 mile west of the project site. Further, as described in Sections 2.4.9(a) and 2.4.9(b), the project is a "glamping" campground and would not result in any potentially significant impacts related to the routine transport, use, and disposal of hazardous substances or 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. Therefore, no impact would occur related to emission or handling of hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school.

Given that the proposed project would result in no impacts related to emission or handling of hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school, and that none of the identified cumulative projects are located within the immediate vicinity (2,000 feet) of the project site, the proposed project would not contribute to a cumulatively considerable impact to schools from hazardous materials.

d. Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

No Impact. According to EnviroStor (DTSC 2023) and GeoTracker (SWRCB 2023), the agricultural property west of the site across Milliken Creek is listed in GeoTracker as enrolled in the Irrigated Lands Regulatory Program. The project is not located on a hazardous materials site pursuant to California Government Code, Section 65962.5. Therefore, no impact would occur.

Given that no impact would occur, the project would not contribute to a cumulatively considerable impact related to hazardous materials sites.

e. Would the project 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, result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact. No public or private airports are within 2 miles of the project site, and the project site is outside an Airport Land Use Plan. The closest (public) airport is Napa County Airport, approximately 6.5 miles south of the project site, and no private airstrips are within the vicinity. Therefore, no impact would occur.

Given that no impact would occur, the project would not contribute to a cumulatively considerable impact related to airports or private airstrips.

f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant with Mitigation Incorporated. The City of Napa Standard Specifications provide requirements to ensure that developments provide adequate access for emergency vehicles. Applicable requirements identified in these plans include minimum roadway widths of 14 feet for one-way traffic and 20 feet for two-way traffic, minimum driveway widths of 12 feet, and a maximum roadway grade of 15 percent. Additionally, at least two points for fire apparatus access shall be provided when it is determined by the Fire Chief that access by a single route might be impaired by vehicle congestion or factors that could limit ingress or egress.

The project site would be accessed via a new driveway on SR-121/Silverado Trail. The project would not generate traffic volumes that would impede emergency access. The project would not alter any established emergency vehicle routes or otherwise interfere with emergency access. The turning radius on the proposed 20-foot-wide drive aisle would accommodate maneuverability of large trucks and vehicles, including emergency vehicles. It is anticipated that all aspects of the site, including driveway widths and turning radii, would be designed in accordance with applicable standards; therefore, access would be expected to function acceptably for emergency response vehicles. However, given that the project would include one driveway for ingress/egress along SR-121/Silverado Trail, Mitigation Measure TRANS-3, Consultation with City Fire Chief, would require coordination with the City Fire Chief regarding the adequacy of one fire apparatus access point. With implementation of Mitigation Measure TRANS-3, the project would not substantially impair an adopted Emergency Response Plan or Emergency Evacuation Plan, and impacts would be less than significant.

Given that implementation of Mitigation Measure TRANS-3 would mitigate any potential impacts to less-than-significant levels, and that none of the identified cumulative projects are located within the immediate vicinity (2,000 feet) of the project site, the proposed project would not contribute to a cumulatively considerable impact related to conflicts with an Emergency Response Plan or Emergency Evacuation Plan.

g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Less Than Significant Impact. As described further in Section 2.4.20, Wildfire, there are no Very High Fire Hazard Severity Zones (FHSZs) in the City as designated by the California Department of Forestry and Fire Protection (CAL FIRE) (CAL FIRE 2021). The project site is located on a vacant, undeveloped parcel in a rural area on the outskirts of the City. The project site is bordered to the west by Milliken Creek and includes two non-vegetated channels (AF-1 and AF-2) that run east to west through the southern portion of the project site where they connect to Milliken Creek to the west.

The proposed "glamping" campground would include outdoor grills set up with grates at each individual campsite to be used for cooking or socializing around the campfire at night as in a traditional camping experience. The outdoor grills would be elevated from the ground, and guests would only be allowed to utilize "goodwood" material, which is a compressed wood product that burns with less spark and smoke than traditional wood. This goodwood would be provided to guests staying at the site, and guests would not be allowed to bring any off-site fire burning products to the project site. Each campsite would have an interior and exterior fire extinguisher as an added fire safety item. Further, the project operator would prohibit recreational fires on days with a high wildfire risk as a condition of project approval. Additionally, campground staff would remain on site at all hours and would regularly walk the property to ensure these fire reduction measures are implemented.

The two communal fire pits at the Main Office and the pool heater would utilize a single tank of propane. No other project components would require any type of gas on the project site. All buildings on the project site would be constructed and operated in accordance with the California Fire Code.

The location of the project in relation to the open space drainages on site and Milliken Creek adjacent to the site, along with the fire reduction measures described above, would substantially improve survivability of the proposed structures from fire and reduce the chance of ignition. The City determined that the project would exceed the fire resistance and safety requirements prescribed in the California Fire Code. Based on review of the project by City staff and through compliance with the Napa Fire Department's conditions, impacts would be less than significant.

As described above, the project would exceed the fire resistance and safety requirements prescribed in the California Fire Code. Additionally, none of the other cumulative projects are expected to generate substantial risks of wildfire due to the nature of the projects and urban nature of the project sites. Therefore, the proposed project would not contribute to a cumulatively considerable impact related to exposure of people or structures to a significant risk of loss, injury, or death involving wildland fires.

Mitigation Measures

The analysis completed for this section indicates that no significant impacts would result from the proposed project's implementation. As a result, no mitigation measures are required.

2.4.10 Hydrology and Water Quality

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 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?	☐	☐	☒	☐
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 project site is in the Napa River Watershed (Hydrologic Unit 202) (SWRCB 2024). The Napa River Watershed encompasses a land area of approximately 430 square miles within the County. The Napa River, a significant freshwater tributary to San Francisco Bay, runs 55 miles southwest from Calistoga to San Pablo Bay, with the lower 17 miles being estuarine. Numerous tributaries enter the main stem of the Napa River from the mountains that rise abruptly on both sides of Napa Valley. The Napa River Watershed is largely rural and agricultural, with several fast-growing urban areas including the City of Napa and City of American Canyon (Appendix B).

The City's storm drainage system consists of a network of open ditches, culverts, and underground pipes of various sizes and capacities, many of which are maintained by the City's Public Works Department. Rainfall runs off into a drainage collection system that feeds local creeks and the

Napa River, which flows to the San Francisco Bay. The City also has levee systems that prevent flooding of low-lying areas during large storm events.

The City's 2006 Storm Drainage Master Plan evaluated storm drain capacities in relationship to 10-year design storm peak flows, identified existing flooding problems, and recommended storm drain enlargements and improvements. Some of the recommendations from these studies have been implemented. The ongoing Napa River and Creek Flood Protection Project includes improvements that will help lower risk of flooding of Napa Creek and the Napa River. Several project components have been completed, and remaining project elements including floodwalls are estimated to be completed by 2027. However, in the event of large storms, residual flooding can occur when runoff from the City is prevented from flowing into the river due to constructed levees and floodwalls.

The City also seeks to reduce pollutant discharge from urban runoff into natural water bodies using BMPs. Urban areas create more runoff than natural settings or agriculture because the soil is covered by impermeable surfaces such as roads, driveways, and roofs, which prevent the water from soaking into the ground. In addition, urban uses result in auto wastes, lawn pesticides, fertilizers, and other chemicals being carried into urban runoff. To help manage stormwater pollution discharge, the City is part of a joint effort with the County and neighboring jurisdictions on the Napa Countywide Stormwater Pollution Prevention Program, which seeks to:

- Prevent stormwater pollution.
- Protect and enhance water quality in creeks and wetlands.
- Preserve beneficial uses of local waterways.
- Comply with state and federal regulations.

The City of Napa Policy Resolution No. 27 includes the City's standard conditions of project approval for all development projects, unless otherwise authorized by the City or superseded by subsequently adopted and more stringent requirements. The following measures related to hydrology and water quality listed in Resolution No. 27 are applicable to the proposed project:

- To ensure adequate drainage control, the Developer of any project which introduces new impervious surfaces (roof, driveways, patios) which will change the rate of absorption of drainage or surface run-off shall submit a drainage and grading plan designed in accordance with Policy Resolution No. 17 and the City of Napa Public Works Department Standard Specifications to the Public Works Department for its approval.
- If the project is in the Flood Hazard or Floodway Areas of the Napa River or its tributaries, Developer shall submit Certifications of Compliance by a registered architect or civil engineer required by Napa Municipal Code, Chapter 17.62, to the Public Works Department at the times set forth in Chapter 17.62.

- The Developer shall ensure that no construction materials (e.g., cleaning fresh concrete from equipment) are conveyed into the storm drain system. The Developer shall pay for any required cleanup, testing, and City administrative costs resulting from consequence of construction materials into the storm water drainage system.
- All materials that could cause water pollution (i.e., motor oil, fuels, paints, etc.) shall be stored and used in a manner that will not cause any pollution. All discarded material and any accidental spills shall be removed and disposed of at an approved disposal site.
- All construction activities shall be performed in a manner that minimizes, to the maximum extent practicable, any pollutants entering directly or indirectly the storm water system or ground water. The Developer shall pay for any required cleanup, testing, and City administrative costs resulting from consequence of construction materials into the storm water drainage system.
- Unless otherwise provided, all measures included in project approval pursuant to the Napa Municipal Code shall be installed or carried out prior to final clearance of the building permit or concurrently with the installation of site improvements in the case of a subdivision map.
- Developer shall meet the requirements of discharging to a public storm drainage system as required to ensure compliance by the City with all state and federal laws and regulations related to storm water as stipulated in the Clean Water Act. Developer shall meet the requirements of the National Pollutant Discharge Elimination System ("NPDES") permit in effect prior to completion of project construction for storm water discharges from the municipal storm water system operated by the City of Napa.
- Developer shall mark all new storm drain inlets with permanent markings, which state "No Dumping-Flows to River." This work shall be shown on improvement plans.
- Developer shall record a plan for long-term private maintenance acceptable to the Director of Public Works and the City Attorney for any structural storm water pollution removal devices or treatment control BMP incorporated as part of the project. The plan shall comply with City and California Regional Water Quality Control Board ("SWRCB") requirements including, but not limited to, a detailed description of responsible parties, inspections, maintenance procedures for the detention system, including monitoring and documentation of annual report to the Public Works Department and procedures for enforcement. Appropriate easements or other arrangements satisfactory to the Public Works Director and City Attorney necessary or convenient to ensure the feasibility of the scheme and fulfillment of maintenance responsibilities shall be secured and recorded prior to approval of the final/parcel map or issuance of a building permit, whichever comes first.

In addition, the following standards and regulations related to hydrology and water quality apply to the proposed project:

- City of Napa Municipal Code,
- City of Napa Standard Specifications and Standard Plans, dated January 2022, including any supplemental updates thereto,
- the City's "BASMAA Post-Construction Manual" prepared by the Bay Area Stormwater Management Agencies Associated Phase II Committee, dated July 14, 2019 (BASMAA Manual), and
- the SWRCB Construction General Permit, Order 2022-0057-DWQ.

A Stormwater Control Plan was prepared for the project by RSA Civil, dated November 2023 (Appendix E). The impact analysis below is based on the analysis and findings of the Stormwater Control Plan.

The project site is currently undeveloped. The drainage characteristics of the site consist generally of sheet flow over the ground surface that concentrates in human-made surface drainage elements, such as ditches, gutters, and on-site storm drain pipe. While drainage from the project site and SR-121/Silverado Trail is primarily retained on site, surface water flows in a westerly direction and discharges onto the site into Milliken Creek before ultimately discharging to Napa River and the San Francisco Bay (Appendix E). The entire project site is located within the Federal Emergency Management Agency (FEMA) 1-percent annual chance floodplain (FEMA 2010). The project is also located within the Floodplain Management Overlay Zone District.

Impact Analysis

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. The proposed project would construct a permitted "glamping" campground with up to five permanent buildings, up to 100 fixed recreational units, a pool, recreational activity space, and a pervious parking area. Construction of the project would require grading and other ground-disturbing activities that could result in erosion and siltation affecting Milliken Creek. Given that the proposed project would disturb over 1 acre of ground surface, a waste discharge identification number and an NPDES General Construction Permit for stormwater discharges must be obtained from the State Water Resources Control Board (Region 2). The NPDES General Construction Permit requires preparation and implementation of a SWPPP and associated BMPs. Construction BMPs would include erosion and sediment control, water flow dissipation, off-site sediment tracking, and materials and waste management. Additionally, the project would be required to comply with the applicable measures identified in the City of Napa Policy Resolution No. 27, City of Napa Municipal Code, the City of Napa Standard Specifications and Standard Plans, the City's BASMAA Manual, and the SWRCB General Permit Order 2022-0057-DWQ.

Operationally, the proposed drainage design for the project includes self-retaining areas on site and permeable pavement for infiltration. Therefore, the Stormwater Control Plan (Appendix E) concludes that the proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. With implementation of proposed construction BMPs associated with the required NPDES General Construction Permit and the proposed self-retaining areas on site, the project would have a less than significant impact on water quality standards and waste discharge requirements and would not substantially degrade surface or groundwater quality.

Given that construction and operation of the project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, the proposed project would not contribute to a cumulatively considerable impact related to surface or groundwater quality. Furthermore, other cumulative projects would be required to comply with City of Napa and applicable state and federal regulations that regulate surface and/or groundwater quality.

b. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less Than Significant Impact. As identified by the Water Quality Control Plan for the San Francisco Bay Basin, the project site drains within the San Pablo Basin. The RWQCB has designated water quality objectives for waters of the San Francisco Bay region to protect the existing and potential beneficial uses of each hydrologic unit. Milliken Creek has the following existing beneficial uses: freshwater replenishment; cold freshwater habitat; warm freshwater habitat; preservation of rare, threatened, or endangered species; wildlife habitat; migration of aquatic organisms; fish spawning; contact water recreation; and non-contact water recreation. Water quality objectives are those as listed in Tables 3-1 through 3-7 of the Water Quality Control Plan for the San Francisco Bay Basin (RWQCB 2023).

The NPDES General Construction Permit requires preparation and implementation of a SWPPP and associated BMPs to ensure that potential pollutants would be reduced to the maximum extent practicable so as not to increase the level of pollutants in receiving waters and reduce impacts on stormwater quality and hydromodification. Construction BMPs would include erosion and sediment control, water flow dissipation, off-site sediment tracking, and materials and waste management.

Implementation of the proposed "glamping" campground would not include development activities that could otherwise deplete groundwater supplies. Infiltration would be maintained through project design, including the self-retaining areas, permeable pavements, proposed landscaping, and the open space on the site. The proposed project would not interfere substantially with groundwater recharge, and potential impacts to groundwater supplies would be less than significant.

As described above, the project would minimize impervious areas across the project site, maintaining the potential for groundwater recharge across the site. Furthermore, water demand associated with the proposed project would be relatively minimal and consistent with typical commercial campground sites. As described in Section 2.4.19, Utilities and Service Systems, the City does not rely on groundwater for its potable water supplies. Therefore, the proposed project, in combination with other cumulative projects, would not contribute to a cumulatively considerable impact related to groundwater recharge or groundwater supplies.

c. Would the project 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 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?

iv. Impede or redirect flood flows?

Less Than Significant Impact. Construction of the project would require grading and other ground-disturbing activities that could result in erosion and siltation affecting Milliken Creek. However, the project would be required to obtain a NPDES General Construction Permit for stormwater discharges from the State Water Resources Control Board (Region 2). The General Construction Permit requires preparation and implementation of a SWPPP and associated BMPs, including but not limited to erosion and sediment control, water flow dissipation, off-site sediment tracking, and materials and waste management measures. Implementation of the SWPPP and associated BMPs would minimize the potential for stormwater runoff, erosion, and siltation during construction.

The Stormwater Control Plan (Appendix E) prepared for the project determined that the proposed development would not significantly alter the existing drainage patterns. In addition, infiltration would be maintained through project design, including the self-retaining areas, permeable pavements, proposed landscaping, and the open space on the site, to avoid polluted runoff and flooding on and off site. Impervious areas on the 12.5-acre site would increase by only 135,560 square feet. As specified in City of Napa Policy Resolution No. 27, the applicant would submit a drainage and grading plan designed in accordance with Policy Resolution No. 17 and the City of Napa Public Works Department Standard Specifications to the Public Works Department for approval. Additionally, the project would be required to comply with the applicable measures identified in the City of Napa Municipal Code, the City of Napa Standard Specifications and Standard Plans, the City's BASMAA Manual, and the SWRCB General Permit Order 2022-0057-DWQ.

Therefore, with the self-retaining areas, permeable pavements, proposed landscaping, and the open space on the site, the proposed project would not substantially alter the existing drainage pattern of the site or area in a manner that would result in substantial erosion or siltation on or off site; substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site; create or contribute runoff water that would exceed the capacity of existing stormwater drainage systems or provide substantial additional sources of polluted runoff; or impede or redirect flood flows. Impacts would be less than significant.

As described above, the project would implement standard BMPs for erosion and sediment control and would not significantly alter the existing drainage patterns. Further, the project would minimize impervious areas across the project site, maintaining the potential for groundwater recharge across the site. Therefore, the proposed project would not contribute to a cumulatively considerable impact related to substantially altering the existing drainage pattern of the site or area. Furthermore, other cumulative projects would be required to obtain a NPDES General Construction Permit for stormwater discharges from the SWRCB and comply with the applicable requirements of the City of Napa Policy Resolution No. 27, City of Napa Municipal Code, the City of Napa Standard Specifications and Standard Plans, the City's BASMAA Manual, and the SWRCB General Permit Order 2022-0057-DWQ, as well as other applicable local, state, and federal regulations that regulate hydrology and water quality.

d. Would the project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Less Than Significant Impact. The project site is located within the FEMA 1-percent annual chance floodplain (FEMA 2010). Additionally, the project site is within the low dam inundation hazard area for Lake Cynthia (California Department of Water Resources, Division of Safety of Dams 2020). The project site is not located within a Tsunami or Seiche Inundation Zone. In accordance with City of Napa Policy Resolution No. 27, Certifications of Compliance would be submitted by a registered architect or civil engineer per Napa Municipal Code, Chapter 17.62. The project would also be required to comply with the applicable measures identified in the City of Napa Municipal Code, the City of Napa Standard Specifications and Standard Plans, the City's BASMAA Manual, and the SWRCB General Permit Order 2022-0057-DWQ. In addition, the project would not include the storage or handling of hazardous materials on site. Therefore, the risk of pollutants being released due to project inundation is not expected. Impacts would be less than significant.

Given that construction and operation of the project would not include the storage or handling of hazardous materials on site and would submit Certifications of Compliance in accordance with City of Napa Policy Resolution No. 27, the proposed project would not contribute to a cumulatively considerable impact related to the risk of pollutants being released due to project inundation. Furthermore, all cumulative projects would be required to comply with the applicable requirements of the City of Napa Policy Resolution No. 27, City of Napa Municipal Code, the City

of Napa Standard Specifications and Standard Plans, the City's BASMAA Manual, and the SWRCB General Permit Order 2022-0057-DWQ, as well as other applicable local, state, and federal regulations that regulate flood zones and water quality.

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. The project site would be in compliance with the NPDES Construction General Permit, the SWPPP prepared for the project, and applicable Napa Municipal Code sections. Refer to Sections 2.4.10(a) through 2.4.10(d). Therefore, the project would not conflict with or obstruct implementation of a Water Quality Control Plan or Sustainable Groundwater Management Plan. Direct and cumulative impacts would be less than significant.

Mitigation Measures

The analysis completed for this section indicates that no significant impacts would result from the proposed project's implementation. As a result, no mitigation measures are required.

2.4.11 Land Use and Planning

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 project site is designated by the City's General Plan as Very Low Density Residential (up to 2.0 dwelling units per gross acre) and is zoned Single-Family Residential (RS 40). The project is also located within the Floodplain Management and Traffic Impact Overlay Zone Districts.

The City of Napa Policy Resolution No. 27 includes the City's standard conditions of project approval for all development projects, unless otherwise authorized by the City or superseded by subsequently adopted and more stringent requirements. The following measures related to land use and planning listed in Resolution No. 27 are applicable to the proposed project:

- Developer shall comply with all requirements of federal, state, and local laws and regulations applicable to project construction and issuance of building permits.
- Developer shall comply with the monitoring/reporting check lists development pursuant to the City of Napa Resolution 96-153 regarding CEQA implementation procedures for both standard and project-specific mitigation measures.
- Developer shall notify all employees and agents of the mitigation measures and conditions applicable to the project and shall ensure compliance with such measures and conditions. Developer shall also notify all assigns and transferees of the same.

Impact Analysis

a. Would the project physically divide an established community?

No Impact. The project does not propose the introduction of new major infrastructure such as roadways, water supply systems, or utilities to the area that would have the potential to physically divide an established community. The project would require a text amendment to the City of Napa Municipal Code for the site to develop a permitted "glamping" campground rather than single-family residential development. Therefore, the project would be consistent with the use regulations in place and surrounding land uses and would not significantly disrupt or physically divide an established community. No impact would occur.

Given that no impact would occur with regard to physically dividing an established community, the project would not contribute to a cumulatively considerable impact.

b. Would the project 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?

Less Than Significant Impact. As discussed previously, the project would require a text amendment to the City of Napa Municipal Code (Appendix I, Text Amendment) for the site to develop a permitted "glamping" campground rather than single-family residential development. With implementation of Mitigation Measures BIO-1 through BIO-7, CUL-1, GEO-1, and TRANS-1 through TRANS-3, the project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. With the obtainment of a text amendment to the City of Napa Municipal Code and implementation of mitigation measures, the project would result in a less than significant impact related to consistency with land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect.

Similar to the proposed project, cumulative projects would be required to avoid conflicts with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the proposed project, in combination with other cumulative projects, would not contribute to a cumulatively considerable impact due to conflicts with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Mitigation Measures

Mitigation Measures BIO-1 through BIO-7, CUL-1, GEO-1, and TRANS-1 through TRANS-3 would ensure that the proposed project would not result in a significant impact related to consistency with land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Refer to Section 2.4.4, Biological Resources, Section 2.4.5, Cultural Resources, Section 2.4.7, Geology and Soils, Section 2.4.17, Transportation, and Section 2.4.18, Tribal Cultural Resources.

2.4.12 Mineral Resources

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☒	☐
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 nearest active mine to the City is the Napa Quarry (Syar Industries, Inc.), which primarily produces stone (DOC 2016). The quarry is immediately south of the Napa State Hospital southeast of the City of Napa. The Napa Quarry (formerly Basalt Rock Quarry) first opened in the early 1900s and now generates approximately 500,000 tons of basalt rock per year for use as concrete aggregate (County of Napa 2008).

Impact Analysis

a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

Less Than Significant Impact. The project site has not been classified by the DOC Division of Mines and Geology as an area of "Potential Mineral Resource Significance" (MRZ-3), and there are no active mines within the City (DOC 2016). According to the Biological Resources Technical Report (Appendix B) prepared for the project, the project site is underlain by Hambright rock-outcrop complex and Yolo loam (0 to 10 percent slopes) (USDA 2019). Additionally, the project site is surrounded by developed rural residential land uses and agricultural fields, which would be incompatible with future extraction of mineral resources on the project site. A future mining operation at the project site would likely create a significant impact to neighboring properties for issues such as noise, air quality, traffic, and possibly other impacts. Therefore, implementation of the project would not result in the loss of availability of a known mineral resource that would be of value since the mineral resource extraction would not occur at the site due to incompatible land uses. Impacts would be less than significant.

Given that the proposed project would not result in the loss of availability of a known mineral resource that would be of value to the region or the residents of the state, the project, in combination with other cumulative projects, would not contribute to a cumulatively considerable impact on mineral resources.

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?

No Impact. The project site is not in an area that has Mineral Resource Zone 2 (MRZ-2) designated lands, nor is it within 1,300 feet of such lands. Therefore, the project would not result in the loss of availability of locally important mineral resources. Therefore, no potentially significant loss of availability of a locally important mineral resource recovery (extraction) site delineated on a local General Plan, Specific Plan, or other land use plan would occur as a result of this project. No impact would occur.

Given that the proposed project would not result in the loss of availability of a locally important mineral resource recovery (extraction) site, the project, in combination with other cumulative projects, would not contribute to a cumulatively considerable impact on mineral resources.

Mitigation Measures

The analysis completed for this section indicates that no significant impacts would result from the proposed project's implementation. As a result, no mitigation measures are required.

2.4.13 Noise

Would the project result in:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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, expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Environmental Setting

The City of Napa General Plan Safety and Noise Element contains a variety of goals, policies, and other guidance pertaining to the control of noise. The Element considers noise sensitive land uses to be those that are sensitive to high noise levels including residences, religious facilities, schools, childcare centers, hospitals, long-term health care facilities, convalescent centers, and retirement homes. The primary existing source of noise in the vicinity of the project site is traffic along Silverado Trail. The applicable performance standards for non-transportation sources are an hourly equivalent continuous sound level of 55 A-weighted decibels (dBA) or below during daytime hours (7:00 a.m. to 10:00 p.m.) and 45 dBA or below during nighttime hours (10:00 p.m. to 7:00 a.m.). Maximum allowable noise levels are 75 dBA during the daytime and 65 dBA during the nighttime. These standards are lowered by 5 decibels (dB) for simple tone noises, noises consisting primarily of speech or music, or for recurring impulsive noises.

The Safety and Noise Element also includes land use noise compatibility standards, which define the type of land uses that can be acceptably developed in a given ambient noise environment. Depending on the type of proposed land use and ambient noise level at the site, the use is classified as either normally acceptable, conditionally acceptable, normally unacceptable, or clearly unacceptable. Applicable compatibility standards for the project are for the low-density single-family residential land use, which is the land use adjacent to north, east, and south of the project site. The normally acceptable, conditionally acceptable, normally unacceptable, and clearly unacceptable noise levels are 50 to 60 dB, 55 to 70 dB, 70 to 75 dB, and 75 to 85dB, respectively.

The Safety and Noise Element has also established exterior and interior noise standards for permitted development, to be attained through noise attenuation measures, as applicable. The standard for interior noise for residential land uses (45 dBA Community Noise Equivalent Level [CNEL]) is consistent with that in the California Building Code. These standards are summarized in Table 7, City of Napa Exterior and Interior Noise Standards, and are the applicable standards for evaluating allowable noise exposure for transportation sources.

Table 7. City of Napa Exterior and Interior Noise Standards

Land Use	Outdoor Activity Areas[1,2] (dBA CNEL)	Interior Spaces (dBA CNEL)
Residential	603	45
Motels, Hotels	65	45
Hospitals, Residential Care Facilities, Schools, Libraries, Museums, Churches, Day Care Facilities	65	45
Playgrounds, Parks, Recreation Uses	65	50
Commercial and Office Uses	65	50
Industrial Uses	70	65

Source: City of Napa 2022.

Notes: CNEL = Community Noise Equivalent Level; dBA = A-weighted decibel

[1] For non-residential uses, where an outdoor activity area is not proposed, the standard does not apply. Where the location of outdoor activity areas is unknown, the exterior noise level standard shall be applied to the property line of the receiving use.

[2] Where it is not possible to reduce noise in outdoor activity areas to the allowable maximum, levels up to 5 dB higher may be allowed provided that available exterior noise level reduction measures have been implemented and interior noise levels are in compliance with this table.

The Napa Municipal Code contains a limited set of regulations that would apply to the proposed project's noise impacts, specifically those from construction activities. Section 8.08.025 of the Napa Municipal Code and the City of Napa Policy Resolution No. 27 include limitations on hours of operation for construction equipment and the City's standard conditions of project approval for all development projects, unless otherwise authorized by the City. The following measures related to noise listed in Policy Resolution No. 27 are applicable to the proposed project:

- Construction activities shall be limited to specific times pursuant to Napa Municipal Code, Section 8.08.025, which limits construction activities to 7:00 a.m. to 7:00 p.m., Monday through Friday and 8:00 a.m. to 4:00 p.m. on weekends or legal holidays, unless a permit is first secured from the City Manager (or his/her designee) for additional hours. The ordinance further states that there will be:
  - No start-up of machines nor equipment prior to 8:00 a.m., Monday through Friday;
  - No delivery of materials nor equipment prior to 7:30 a.m. nor past 5:00 p.m., Monday through Friday;
  - No cleaning of machines nor equipment past 6:00 p.m., Monday through Friday; and
  - No servicing of equipment past 6:45 p.m., Monday through Friday.

- Construction equipment must have state-of-the-art muffler systems required by current law. Muffler systems shall be properly maintained.
- Noisy stationary construction equipment, such as compressors, shall be placed away from developed areas off site and/or provided with acoustical shielding.
- Grading and construction equipment shall be shut down when not in use.

Impact Analysis

a. Would the project result in 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?

Less Than Significant Impact. The proposed project would include construction and operation of a "glamping" campground with five permanent buildings, up to 100 fixed recreational units, a recreational activity space, and a pervious parking area. Noise impacts from construction and operation of the project are discussed below.

Construction

Construction of the project would have the potential to result in temporary noise level increases as a result of the operation of heavy equipment. Construction of the project would generate noise that could expose nearby receptors to elevated noise levels that may disrupt communication and routine activities. The magnitude of the impact would depend on the type of construction activity, equipment, duration of the construction phase, distance between the noise source and receiver, and intervening structures. Sound levels from typical construction equipment range from 60 to 90 dBA equivalent continuous sound level at 50 feet from the source (FHWA 2008). Noise from construction equipment generally exhibits point source acoustic characteristics. Strictly speaking, a point source sound decays at a rate of 6 dBA per doubling of distance from the source. The rule applies to the propagation of sound waves with no ground interaction.

Standard equipment, such as dozers, loaders, graders, backhoes, scrapers, and miscellaneous trucks, would be used for construction of the project. Noise levels from standard construction equipment on the project site were determined based on typical equipment noise levels established by the Roadway Construction Noise Model (FHWA 2008) (Appendix F, Roadway Construction Noise Model Results). The three noisiest pieces of construction equipment (i.e., grader, dump truck, and dozer) that could be required for the project were assumed to operate simultaneously in the same location in order to represent a worst-case scenario during construction. This scenario would have the potential to generate noise levels up to 73 dBA at 200 feet from the construction site. The nearest sensitive receptors are a single-family residence approximately 200 feet south of the construction area and a single-family residence approximately 200 feet east of the construction area on Silverado Trail. The Napa Municipal Code does not establish a quantitative threshold for construction noise; therefore, the analysis relies on the Federal Transit Administration's Detailed

Analysis Construction Noise Criteria (FTA 2018) thresholds to screen for potential impacts from construction noise. Construction would be limited to the City's allowable hours outlined in Policy Resolution No. 27 and Napa Municipal Code, Section 8.08.025, Noise – Construction activity; therefore, the Federal Transit Administration daytime threshold of 80 dBA equivalent continuous sound level (8 hours) is applicable. Estimated noise levels during project construction would not exceed the 80 dBA daytime limit. Impacts would be less than significant.

Operation

Potential noise generated by project traffic and on-site sources are addressed below.

Transportation Noise

The potential for implementation of the project to permanently increase ambient noise levels as a result of increased traffic was assessed using standard noise modeling equations adapted from the Federal Highway Administration Noise Prediction Model (Appendix F). Traffic noise is primarily a function of volume, vehicle mix, speed, and proximity. For purposes of this evaluation, the vehicle mix, speed, and proximity are assumed to remain constant. Thus, the primary factor affecting noise levels would be increased traffic volumes. The project would increase traffic volumes on local roadways, specifically on Silverado Trail. Noise level increases on Silverado Trail would be greatest at the project site, which would represent the greatest concentration of project-related traffic.

Typically, a project would have to double the traffic volume on a roadway in order to have a significant direct noise increase of 3 dB (i.e., the minimum noise increase needed for it to be perceptible to the human ear) or more or to be a major contributor to the cumulative traffic volumes. The TIS prepared for the project (Appendix G) calculated the project trip generation to be 631 average daily trips (ADT). The Traffic Study analyzed one segment of Silverado Trail between Stonecrest Drive and Hagen Road. The existing traffic volume (without the project) on this roadway segment is 13,647 ADT and the future ADT with the project is calculated to be 14,278 ADT. Traffic noise modeling results calculated the existing street segment to generate noise levels of 67.5 dBA CNEL at 50 feet from the centerline, and 67.7 dBA CNEL at 50 feet with project traffic (Appendix F). The addition of project trips to the area roadway would result in a less than 1 dBA CNEL increase in ambient traffic noise levels. Therefore, this increase in traffic noise levels would not be perceptible, and the project would not result in the exposure of noise sensitive land uses to significant noise levels. Impacts would be less than significant.

Other Noise Sources

On-site noise sources from project operation would consist of new activity on the site, including intermittent recreational activities and parking areas. The project would have the potential to generate nuisance noise from the occupied campsites (e.g., people talking, dogs barking) and the

recreational activity space, which could include a children's playground, bocce ball courts, outdoor game areas, and a pool area. Noise from these uses would typically be limited to normal conversation noise levels (approximately 65 dBA) with some sporadic incidental recreational noise due to children at play. The noises would typically be intermittent, short in duration, and at varying distances from individual receptors. Additionally, at a distance of at least 200 feet to the nearest residences south and east of the construction area, noise levels from typical conversation would be reduced to below the most conservative Safety and Noise Element standard of 40 dBA for speech and music during nighttime hours.

Similarly, noise sources from parking areas could include car alarms, door slams, radios, and tire squeals. These sources typically range from approximately 51 to 66 dBA at a distance of 10 feet (Harris & Associates 2020) and are generally short term and intermittent. Parking areas have the potential to generate noise levels that exceed 65 dBA, depending on the location of the source; however, noise sources from the parking areas would be different from each other in kind, duration, and location. Therefore, the overall effects would be separate and, in most cases, would not affect noise-sensitive receptors at the same time. Additionally, due to distance to the nearest receptor, noise would not be expected to exceed Safety and Noise Element standards as a result of nuisance noise. On-site operational nuisance noise would not result in a significant impact.

Therefore, the project would not result in the exposure of persons or generation of noise levels that exceed applicable standards during construction or operation, and impacts would be less than significant.

Given that the project would not generate noise levels that exceed applicable standards during construction or operation, and that none of the identified cumulative projects are located within the immediate vicinity (2,000 feet) of the project site, the proposed project would not contribute to a cumulatively considerable impact related to exposure of people to excessive noise.

b. Would the project result in the generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. Section 8.08.025 of the Napa Municipal Code restricts construction activities to the hours of 7 a.m. to 7 p.m., Mondays through Fridays. The Napa Municipal Code also states that it is unlawful to start-up construction machines and equipment prior to 8 a.m., Mondays through Fridays. Activities involving pile driving and blasting typically generate the highest vibration levels compared to other construction methods, and therefore, are of greatest concern when evaluating construction-related vibration impacts. Project construction would not involve the use of ground vibration-intensive activities, such as pile driving or blasting. The equipment fleet is anticipated to consist of equipment that generates lower levels of ground vibration, such as graders. In addition, groundborne vibration attenuates rapidly from the source. The nearest sensitive receptors, single-family residences directly south and east of the project site, are approximately 200 feet from the project

construction area. Vibration levels from typical construction equipment, such as graders, would attenuate to below distinctly perceptible annoyance levels at approximately 50 feet from the construction area (Caltrans 2013). Therefore, the project would not result in excessive groundborne vibration or groundborne noise levels affecting nearby sensitive receptors. Per Section 8.08.025 of the Napa Municipal Code, general good practice measures during construction would also be followed, including reasonable maintenance of equipment, conservative planning of simultaneous equipment operation, and using equipment with effective mufflers (City of Napa 2024).

During operation, no major sources of groundborne vibration are anticipated because lodgings and commercial campgrounds are not a typical source of vibration. Therefore, less than significant impacts related to groundborne vibration would occur from construction and operation of the project.

Given that the project would not generate excessive groundborne vibration during construction or operation, and that none of the identified cumulative projects are located within the immediate vicinity (2,000 feet) of the project site, the proposed project would not contribute to a cumulatively considerable impact related to exposure of people to excessive groundborne vibration.

c. Would the project, 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, expose people residing or working in the project area to excessive noise levels?

No Impact. No public or private airports are within 2 miles of the project site, and the project site is outside an Airport Land Use Plan (Napa County Airport Land Use Commission 1999). The closest (public) airport is Napa County Airport, approximately 18 miles southwest of the project site, and no private airstrips are within the immediate vicinity. Therefore, no impact would occur.

Furthermore, the project would not contribute to a cumulatively considerable impact related to excessive noise levels from a private airstrip or public airport. Given the distance to Napa County Airport, no other cumulative projects within 2 miles of the project site would be within 2 miles of an airport.

Mitigation Measures

The analysis completed for this section indicates that no significant impacts would result from the proposed project's implementation. As a result, no mitigation measures are required.

2.4.14 Population and Housing

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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

As of 2020, the City has a population of 79,246 (U.S. Census Bureau 2020).

Impact Analysis

a. Would the project 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)?

Less Than Significant Impact. The project proposes a "glamping" campground with up to five permanent buildings, up to 100 fixed recreational units, a pool, recreational activity space, and a pervious parking area. Implementation of the project would not result in substantial population growth. Therefore, the physical changes associated with the project including residential density and water and sewer service would be less intensive that what was anticipated by the Napa General Plan. The project would not indirectly induce substantial unplanned population growth as the project would serve tourists and existing local residents. Additionally, the project is anticipated to employ a total of only four full-time employees and nine part-time employees. These employees are anticipated to be drawn from the existing regional population. Therefore, impacts related to population growth would be less than significant.

There are several cumulative projects within 2 miles of the project site that would generate population growth within the City (e.g., First Street Apartments, Jamboree Housing, Keller Apartments, Napa Creek Condos, Vintage Farm Subdivision, Ritz-Carlton). However, the project itself would not generate unplanned population growth, as described above. Therefore, the proposed project, in combination with other cumulative projects, would not contribute to a cumulatively considerable impact related to population growth.

b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The project site is currently undeveloped and vacant. Therefore, the proposed project would not displace existing people or housing, necessitating the construction of replacement housing elsewhere, and there would be no impact.

Given that the proposed project site is currently undeveloped and vacant, the project would not contribute to a cumulatively considerable impact related to displacing existing people or housing. Furthermore, as described in Section 2.4.14(a), there are several cumulative projects within 2 miles of the project site that would develop new housing within the City (e.g., First Street Apartments, Jamboree Housing, Keller Apartments, Napa Creek Condos, Vintage Farm Subdivision).

Mitigation Measures

The analysis completed for this section indicates that no significant impacts would result from the proposed project's implementation. As a result, no mitigation measures are required.

2.4.15 Public Services

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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:				
Fire protection?	☐	☐	☒	☐
Police protection?	☐	☐	☒	☐
Schools?	☐	☐	☒	☐
Parks?	☐	☐	☒	☐
Other public facilities?	☐	☐	☒	☐

Environmental Setting

Fire Protection

Fire protection in the City is provided by the Napa Fire Department. Services provided by the Napa Fire Department include fire suppression, fire prevention, community outreach and education, emergency medical and rescue services, and response to incidents involving hazardous materials. There are three divisions within the department: Operations, Administration, and Fire Prevention. The Fire Prevention Division is responsible for inspecting commercial and residential construction projects; weed abatement; commissioning fire protection systems; enforcing building occupancy limits including in hotels, motels, apartments, schools, and assemblies; investigating fire-hazard-related complaints; and investigating fires to determine their origin and cause (City of Napa 2022).

The Napa Fire Department operates five fire stations throughout the City. The Napa Fire Department received 9,702 service calls in 2020, with the majority (66 percent) of calls related to emergency medical services or rescue (Napa Fire Department 2020). In addition to responding to fire and medical emergencies within the City, the Napa Fire Department responds to calls within the County, including nearby cities and unincorporated areas, and travels out of County to help battle wildfires throughout California (City of Napa 2022).

New buildings and additions to existing buildings, utilities, and access are required to comply with all applicable provisions of Napa Municipal Code, Chapter 15.04. In addition, National Fire Protection Association (NFPA) 1194, Standard for Recreational Vehicle Parks and Campgrounds, would be applicable to the project.

Police Protection

The Police Department provides protection and prevention services, including general law enforcement, traffic enforcement, investigations, and routine support services such as communications, evidence collection, analysis and preservation, training, administration, and records keeping. The Napa 911 Dispatch Center receives and processes approximately 115,000 calls per year for the City, as well as for the Napa Sheriff's Department and surrounding communities. In addition to sworn police officers, the Police Department also employs non-sworn community service officers, who provide light duty and supportive police work (City of Napa 2022).

Schools

Publicly funded primary and secondary education in Napa is provided by the Napa Valley Unified School District (NVUSD). As it is separate from the City, NVUSD is responsible for school facilities planning, closures, enrollment, maintenance, and asset management. NVUSD oversees 15 elementary schools (i.e., kindergarten or pre-kindergarten through fifth grade), three middle schools (i.e., grades six through eight), and four high or alternative schools (i.e., grades nine through 12). Additionally, there are 12 private, predominantly parochial schools that offer primary and secondary education in the community. Post-secondary education in Napa is offered at Napa Valley College, which offers a variety of associates degrees, from viticulture and winery technology to digital art and design. In addition, a branch campus of the private culinary college, the Culinary Institute of America at Copia, offers classes in downtown Napa (City of Napa 2022).

Parks

As of 2021, the City provides a total of 1,086.4 acres of existing parks and recreational facilities, including natural areas and open spaces, community parks, neighborhood parks, mini parks, special use parks and facilities, civic spaces, school sites, and landscape assessment districts (refer to Section 2.4.16, Recreation; City of Napa 2022). This represents a ratio of approximately 13.71 acres of parks and recreational facilities per 1,000 City residents, using the 2020 population (refer to Section 2.4.14, Population and Housing).

Impact Analysis

a. Would the project 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:

Fire protection?

Police protection?

Schools?

Parks?

Other public facilities?

Less Than Significant Impact. As described in Section 2.4.14, the proposed "glamping" campground would not result in substantial population growth. The project would not result in the need for new or significantly altered public services or facilities including but not limited to fire protection facilities, sheriff facilities, schools, or parks in order to maintain acceptable service ratios, response times, or other performance service ratios or objectives for any public services. While the project would be expected to result in incremental increases in delay at nearby intersections, emergency response vehicles can claim the right-of-way by using their lights and sirens; therefore, the project would be expected to have a nominal effect on emergency response times. The surrounding residential development is already being serviced by these facilities. In addition, the project would comply with all applicable standards, including compliance with the Uniform Fire Code, Uniform Building Code, installation of automatic sprinkler systems conforming to NFPA and City Standard Specifications, NFPA 1194 (Standard for Recreational Vehicle Parks and Campgrounds), and all appropriate approvals from the Fire Prevention and Building Departments. Therefore, the project would not have an adverse physical effect on the environment because the project does not require new or significantly altered services or facilities to be constructed in order to provide service for the "glamping" campground. Impacts would be less than significant.

Refer to Section 2.4.20 for further information related to fire protection and Section 2.4.16, Recreation, for further information related to recreational facilities.

Given that the project would not require new or significantly altered services or facilities to be constructed in order to provide service for the "glamping" campground, the project would not contribute to a cumulatively considerable impact related to adverse physical impacts associated with the provision of or need for new or physically altered government facilities. All cumulative projects would be required to pay applicable development impact fees and comply with all applicable measures identified in the City of Napa Policy Resolution No. 27.

Mitigation Measures

The analysis completed for this section indicates that no significant impacts would result from the proposed project's implementation. As a result, no mitigation measures are required.

2.4.16 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

As of 2021, the City provides a total of 1,086.4 acres of existing public parks and recreational facilities (City of Napa 2022). This represents a ratio of approximately 13.71 acres of parks and recreational facilities per 1,000 City residents, using the 2020 population (refer to Section 2.4.14).

Natural Areas and Open Spaces: The City provides 422.3 acres of natural areas and open space at seven sites. Additionally, residents have close access to a variety of large regional sites including Lake Hennessey/Moore Creek Park (790 acres) and Skyline Park (850 acres).

Community Parks: Community parks should generally be larger than 15 acres but may range in size from five to 50 acres. The service area for community parks is a 1.5 to 2-mile radius catchment, although community park facilities will attract and serve residents throughout the City. The City's target standard for provision of community parkland is 1.5 acres per 1,000 residents. The City has seven community parks and facilities totaling 407.0 acres.

Neighborhood Parks: Neighborhood parks provide access to recreation for nearby residents, enhance neighborhood identity, and preserve open space (generally two to 10 acres in size, and serve residents within 0.25-mile to 0.5-mile distance). The City's target standard for the provision of neighborhood parkland is 0.5 acre per 1,000 residents. The City currently provides 70.3 acres of neighborhood parks at 22 sites.

Mini Parks: Mini parks are small parks that serve residents in immediately adjacent neighborhoods (generally are up to two acres in size and have a limited service area due to the minimal facilities provided). The City currently provides 10 mini parks that comprise a total of 3.2 acres.

Special Use Parks and Facilities: Special use parks and facilities are community-serving assets but are categorized separately as they are located outside of larger parks and designed to be stand-alone facilities. These can include single-purpose sites, such as ballfields, community centers, or

boat ramps. Special use areas and the facilities they contain typically serve the entire City. Currently, the City has seven special use areas for a total of 24.4 acres.

Civic Spaces: Civic spaces include small, landscaped spaces and gathering areas (generally smaller than one acre in size and easily traversed on foot). Civic spaces provide social space that is often supported by amenities such as benches, tables, landscaping, public art, water features, or other amenities for community events. These spaces are typically located within Downtown districts, high-density urban areas, and transit stations, but are community-wide assets. The City currently provides nine Civic Spaces for a total of 4.3 acres.

Impact Analysis

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?

Less Than Significant Impact. The project proposes a "glamping" campground with up to five permanent buildings, up to 100 fixed recreational units, a pool, recreational activity space, and a pervious parking area. Implementation of the project would not result in substantial population growth that would increase the use of existing recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Additionally, the project would develop recreational facilities, such as internal trail space, outdoor game areas, a children's playground, and bocce ball courts. Therefore, impacts to existing recreational facilities would be less than significant.

Given that the project would not result in substantial population growth that would increase the use of existing recreational facilities, and the project itself would develop new recreational facilities, the proposed project would not result in a cumulatively considerable impact on existing recreational facilities.

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?

Less Than Significant with Mitigation Incorporated. The project proposes recreational facilities, such as internal trail space, outdoor game areas, a children's playground, and bocce ball courts. As described within this IS/MND, the proposed project would not have a significant adverse physical effect on the environment with the implementation of required mitigation measures. Therefore, impacts would be less than significant with implementation of mitigation.

No other cumulative projects within 2 miles of the project site include recreation components. Therefore, the proposed project, in combination with other cumulative projects, would not contribute to a cumulatively considerable impact related to effects on the environment from the construction or expansion of recreational facilities.

Mitigation Measures

The following mitigation measures are required as part of the project to ensure that impacts are mitigated to levels that are less than significant.

- BIO-1: Qualified Biologist
- BIO-2: California Red-legged Frog Avoidance and Protection
- BIO-3: General Bird Breeding Season Surveys
- BIO-4: Sensitive Vegetation Communities and Jurisdictional Aquatic Resources Mitigation
- BIO-5: Roosting Bats
- BIO-6: Aquatic Resources Permitting
- BIO-7: Wildlife Corridors Avoidance
- CUL-1: Archaeological and Tribal Monitoring Program
- GEO-1: Qualified Paleontologist and Paleontological Data Recovery and Monitoring Plan
- GHG-1: Construction Best Management Practices to Reduce Greenhouse Gas Emissions
- TRANS-1: Dedication of Right-of-Way on SR-121/Silverado Trail
- TRANS-2: Vegetation Maintenance for Adequate Site Distance
- TRANS-3: Consultation with City Fire Chief

Refer to Section 2.4.4, Biological Resources; Section 2.4.5, Cultural Resources; Section 2.4.7, Geology and Soils; Section 2.4.8, Greenhouse Gas Emissions; and Section 2.4.17, Transportation, for the full description of these mitigation measures.

2.4.17 Transportation

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 section 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

A TIS was prepared for the proposed project by W-Trans, dated August 2024 (Appendix G). The TIS evaluated the project's potential effect on trip generation and VMT, safety considerations, and emergency operations.

The project site is located along SR-121/Silverado Trail, and therefore, is subject to the City's Traffic Impact Overlay Zone District and Crucial Corridor policy, which limits development to uses that generate no more than 520 ADT per acre. According to the City of Napa General Plan, SR-121/Silverado Trail is a two to four lane highway. Within the project vicinity, it has two 12-foot travel lanes and 1- to 2-foot shoulders in both directions. The vehicle counts conducted as part of the TIS determined that SR-121/Silverado Trail carries about 15,900 vehicles per day on Fridays and 13,600 vehicles per day on Saturdays. Vehicles travel at an 85th percentile speed of 40 miles per hour according to a speed survey conducted for the TIS, while the highway is posted with a 40-mile-per-hour speed limit.

Due to the rural nature of Napa, there are major gaps in the existing pedestrian facilities in and beyond the project area. Pedestrian facilities are generally lacking along the entirety of SR-121/Silverado Trail and the connecting roadways, such as Hagen Road and Stonecrest Drive, which impacts convenient and continuous access for pedestrians and presents safety concerns in those locations. However, given the rural character of the area, the lack of such facilities is typical.

The TIS also included a review of collision history for the project area based on records available from the California Highway Patrol as published in their Statewide Integrated Traffic Records System reports. There were no pedestrian-related crashes in the project area during the most recent five-year study period (January 1, 2018, through December 31, 2022). The TIS determined that the segment of SR-121/Silverado Trail between Hagen Road and Stonecrest

Drive experienced 14 collisions during the five-year study period, translating to a collision rate of 1.04 collisions per million vehicle miles (c/mvm). This is less than the statewide average of 1.07 c/mvm for similar two-lane facilities, indicating that the segment is operating within normal safety parameters (Appendix G).

In the project vicinity, there are Class II bike lanes on Lincoln Avenue and Trancas Street, as well as a Class I Multi-Use path on the Napa River Trail within one mile of the proposed project site. Installation of bike lanes is planned by the City as noted in the Napa Countywide Bicycle Plan, including along SR-121/Silverado Trail directly along the project frontage and on Hagen Road to the north. Bicyclists ride in the roadway and/or on sidewalks along all other streets within the project area.

The Napa Valley Transportation Authority Vine Transit provides fixed route bus service in the City of Napa. No current routes service the project area or its immediate vicinity. Neither the City of Napa's 2040 General Plan nor the Napa Valley Transportation Authority has any proposed plans to extend service into the project area.

The City of Napa Policy Resolution No. 27 includes the City's standard conditions of project approval for all development projects, unless otherwise authorized by the City or superseded by subsequently adopted and more stringent requirements. The following measures related to transportation listed in Resolution No. 27 are applicable to the proposed project:

- All required public frontage and street improvements shall be designed and built in accordance with City of Napa ordinances and the Public Works Department Standard Specifications. Unless waived by the Public Works Director, street improvements shall include curbs, gutter, sidewalk, planting, streetlights, street trees, etc.; any additional right-of-way necessary to accommodate these improvements shall be dedicated to the City.
- During non-working hours, open trenches shall be provided with appropriate signage, flashers, and barricades approved by the Street Superintendent to warn oncoming motorists, bicyclists, and pedestrians of potential safety hazards.
- All road surfaces shall be restored to pre-project conditions after completion of any project-related pipeline installation activities.
- Any pedestrian access through and/or adjacent to the project site shall remain unobstructed during project construction or an alternate route established as approved by the Police Chief and Public Works Director.
- In order to mitigate the cumulative impact of the traffic generated by the subject project on the City's arterial and collective street system, the Developer shall pay a Street Improvement Fee in accordance with Napa Municipal Code, Chapter 15.84, and implementing resolutions to pay for the traffic improvements identified therein. Such fee shall be payable at the rate in effect at the time of payment. The findings set forth

in the ordinance and implementing resolutions are incorporated herein. The City further finds that the calculation of the fees in accordance with the trip generation capacity of development demonstrates there is a reasonable relationship between the amount of the fees imposed and the cost of the street improvements attributable to this project.

Impact Analysis

a. Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Less Than Significant with Mitigation Incorporated. The proposed project would construct a "glamping" campground with up to five permanent buildings, up to 100 fixed recreational units, a pool, recreational activity space, and a pervious parking area. Given that construction worker trips would be temporary and would be dispersed along different routes based on the origin of the trips, construction worker commuting is not expected to have a significant effect on the capacity of the transportation system.

Operationally, the project would improve pedestrian facilities in the project area, per the City's General Plan Land Use and Community Design Element Policies LUCD 3-1 and LUCD 3-6 as well as Transportation Element Policies TE 1-2, TE 2-6, TE 3-3, TE 3-4, and TE 3-5. As previously described, the project site is in a rural area and is auto centric in both land use and purpose as a campground and day-use recreational site. As such, it is reasonable to expect limited pedestrian activity off site. Nevertheless, consistent with City policy, the proposed project would construct a sidewalk along the portion of SR-121/Silverado Trail fronting the project site to connect to the internal trail space and improve pedestrian access in the area.

Additionally, there are no transit facilities that serve the project site or surrounding properties. However, the lack of transit facilities serving the project site is considered acceptable for the rural location, and the project would not interfere with any existing or planned transit facilities. Implementation of the project would not result in the construction of any road improvements or new road design features that would interfere with the provision of public transit or pedestrian facilities or generate sufficient travel demand to increase demand for transit, pedestrian, or bicycle facilities. Therefore, the impact on pedestrian facilities and transit service would be less than significant as the project does not conflict with any policies for these modes.

Given the rural location of the project site, bicycle facilities in the project vicinity are considered adequate. The City of Napa is planning to expand their existing bicycle network to include bike lanes along the project frontage, so bicycle facilities in the project vicinity will be improved once the planned facilities are completed by the City. However, the project does not include construction of bike lanes along its frontage. Therefore, the project could inhibit the City's ability to install the planned bike lanes along the project frontage on SR-121/Silverado Trail in the future. The proposed project would potentially have a significant impact on bicycle facilities if the existing

right-of-way is of insufficient width to accommodate the planned Class II bike lane on SR-121/Silverado Trail. Implementation of Mitigation Measure TRANS-1, Dedication of Right-of-Way on SR-121/Silverado Trail, would require the project to dedicate right-of-way along the project frontage to accommodate the planned Class II bike lane on SR-121/Silverado Trail if the existing right-of-way is insufficient for this planned future improvement.

The City's Crucial Corridor policy limits development to uses that generate no more than 520 ADT per acre. At 12.5 acres, the project site would comply with the Crucial Corridor policy as long as it generates no more than 6,500 ADT. While there is not a daily rate for a campground, based on a comparison with rates for similar uses, it is anticipated that the project would generate an average of 631 ADT, or approximately 51 ADT per acre. Given that this is less than 10 percent of the allowable trips based on the size of the site, the project would be consistent with the Crucial Corridor policy.

With implementation of Mitigation Measure TRANS-1, the project would not conflict with policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. Impacts would be less than significant with mitigation.

Given that implementation of Mitigation Measure TRANS-1 would fully mitigate potential impacts, and that none of the identified cumulative projects are located within the immediate vicinity (2,000 feet) of the project site, the proposed project would not contribute to a cumulatively considerable impact related to conflict with policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decreasing the performance or safety of such facilities.

b. Would the project be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Less Than Significant Impact. Per CEQA Guidelines, Section 15064.3, land use projects should be evaluated based on vehicle miles traveled. CEQA Guidelines, Section 15064.3, states that, for many projects, a qualitative analysis of construction traffic may be appropriate. Since construction traffic is temporary and workers are either traveling to the project jobsite or another jobsite elsewhere, the impact on VMT would be less than significant.

The City of Napa adopted the following VMT thresholds of significance for analyzing transportation impacts under CEQA in May 2021:

- Residential Projects: A proposed project exceeding a level of 15 percent below existing regional VMT per capita may indicate a significant transportation impact.
- Office Projects: A proposed project exceeding a level of 15 percent below existing regional VMT per employee may indicate a significant transportation impact.
- Retail Projects: A net increase in total VMT may indicate a significant transportation impact.

Thresholds for other project types, such as the proposed campground, are to be specified by the City of Napa on a case-by-case basis. City staff provided direction on how VMT for the proposed project should be assessed, relying on guidance provided by the California Governor's Office of Planning and Research (OPR) publication Technical Advisory on Evaluating Transportation Impacts in CEQA ([OPR Technical Advisory] 2018).

Guest Vehicle Miles Traveled

Recreation-based uses, such as campgrounds, are not addressed in the OPR Technical Advisory. For land uses not addressed in the OPR Technical Advisory, it is common practice to consider whether the land use of interest has travel characteristics that are similar to the residential, employment-based, or retail land use types that are addressed. If so, similar VMT assessment methodologies can often be used. In some cases, recreation-based uses have similarities to retail, in that the total demand for services (shopping trips, or in this case recreation visits) tends to remain steady at a regional level and customers/visitors often choose to visit a store/facility based on convenience and its proximity to their home. The use of retail-based methods for assessing recreational uses is also consistent with OPR Staff recommendations (see Appendix G). Therefore, retail uses, which have similar VMT generation rates to campgrounds, were used in the TIS to estimate VMT for the proposed project.

A park or recreational facility may result in shifts to automobile travel patterns that are similar to those seen with retail uses. Research including that cited by OPR Technical Advisory has shown that adding local-serving retail land uses typically redistributes shopping trips rather than creating new trips, improving destination proximity, and thereby reducing trip lengths and total VMT. Although the campground may serve those from outside the local area, visitors wishing to camp in the area would already be able to visit the nearby campgrounds, including the Skyline Wilderness Park, located near the southeast Napa City limits. Therefore, adding a new campground does not necessarily change the total number of people using the camping facilities in the region, but instead redistributes where people choose to visit. The project could also potentially attract visitors who would otherwise stay at alternative lodging, such as hotels or motels, similarly resulting in a redistribution of visitor trips rather than an increase in VMT. Applying this logic, adding the proposed campground can be expected to shift automobile travel patterns but would be unlikely to increase the region's total VMT.

The location of the project also supports reduced VMT by improving destination proximity. The project site is near central Napa, which would be expected to result in reduced trip lengths in comparison to campgrounds in more rural locations in the County. The site is approximately 1.5 miles from downtown Napa, where patrons would be able to access restaurants and other destinations via short trips from the project site. Therefore, while most project trips would likely be made using a vehicle, patrons choosing to stay at the project site instead of a campground or

other lodging at a more remote location would be expected to generate fewer VMT, resulting in a more efficient travel pattern and a net VMT reduction on a regional scale.

Employee Vehicle Miles Traveled

It is expected that there would be 4 full-time employees (i.e., administrative, security, maintenance staff), four part-time housekeeping staff, and five additional part-time staff for peak periods (e.g., weekends, summer months). It is anticipated that maintenance of landscaped areas on site would be subcontracted.

VMT projections for the City of Napa were obtained from the Solano Napa Activity Based travel demand Model (SNABM), which is the regional travel demand model jointly operated by the Napa Valley Transportation Authority and Solano Transportation Authority. The SNABM was recently used to assess the potential transportation impacts associated with adoption of the City of Napa 2040 General Plan. Consistent with the City of Napa's adopted VMT significance thresholds, the General Plan EIR applied a significance threshold for office- employment uses that is set at 15 percent below baseline levels. Per the General Plan EIR, the Napa countywide average VMT per employee is 26.90 VMT per employee, and the corresponding significance threshold (15 percent below the countywide average) is 22.87 VMT per employee.

The proposed project site is in traffic analysis zone (TAZ) 56 of the SNABM model. Zone 56 includes a small portion of the west side of SR-121/Silverado Trail south of Hagen Road and roughly 800 feet north of Stonecrest Drive. The model includes no employment or VMT data for this TAZ zone. Therefore, employee VMT data was estimated by calculating the weighted average VMT per capita for the five TAZs surrounding the project site that have the data. The weighted average VMT per employee was calculated to be 21.40. Since the weighted average VMT per employee in the project's surrounding TAZs is less than the 22.87 VMT per employee significance threshold, the proposed campsite would be considered to have a less than significant VMT impact associated with employee travel. Therefore, the impact of the project on VMT would be less than significant.

There are several cumulative projects within 2 miles of the project site that would generate VMT within the City (e.g., Ritz-Carlton, Bounty Hunter Building, First & Oxbow Hotel, First Street Apartments, Franklin Station Post Office, Jamboree Housing, Keller Apartments, Napa Creek Condos, Vintage Farm Subdivision). However, the project itself would not generate substantial VMT by improving destination proximity, as described above. Therefore, the proposed project, in combination with other cumulative projects, would not contribute to a cumulatively considerable impact related to VMT.

c. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant with Mitigation Incorporated. The project would not substantially increase driving hazards due to a geometric design feature or incompatible uses.

Sight Distance

Sight distance along SR-121/Silverado Trail from the project driveway was evaluated based on sight distance criteria contained in the Highway Design Manual published by Caltrans (Appendix G). While sight distance criteria are not strictly applicable to driveways in areas classified as urban (which includes all locations within the limits of a city), to ensure that the driveway could operate safely, the recommended sight distance was evaluated based on stopping sight distance, with approach travel speed used as the basis for determining the recommended sight distance. Additionally, the stopping sight distance needed for a following driver to stop if there is a vehicle waiting to turn into a side street or driveway was evaluated based on stopping sight distance criterion and the approach speed on the major street.

For a design speed of 40 miles per hour, which is both the posted speed limit and the critical speed observed during the speed survey conducted for the TIS, the minimum stopping sight distance needed is 300 feet. Field measurements indicate that sight distances are approximately 600 feet to the north and over 300 feet to the south. Similarly, sight lines along SR-121/Silverado Trail for a following vehicle exceed 300 feet, and therefore, are adequate for a following driver to observe and react to a vehicle slowing or stopped to turn into the project site's proposed driveway. Therefore, sight distances at the proposed project driveway would be adequate. While sight lines are currently adequate, overgrown vegetation along the project frontage can impede visibility to the south along SR-121/Silverado Trail. Therefore, implementation of Mitigation Measure TRANS-2, Vegetation Maintenance for Adequate Site Distance, would require that vegetation along the project frontage near the site's driveway be maintained at a height of less than 3 feet or above 7 feet to ensure that open sight lines at the driveway are retained.

Turn Lane Warrants

The need for a left-turn lane on SR-121/Silverado Trail at the project driveway was evaluated in the TIS. Upon adding project-generated traffic to existing traffic volumes, the TIS determined that a left-turn lane would not be warranted on SR-121/Silverado Trail at the project driveway during either of the peak periods evaluated (Appendix G).

Vehicle trips to and from the project site would access the site via the proposed on-site driveway connected to SR-121/Silverado Trail. The turning radius on the proposed 20-foot drive aisle would accommodate maneuverability of large trucks and vehicles, including grading equipment, as well as fire trucks per City roadway standards in the case of an emergency. All required public frontage

and street improvements would be designed and built in accordance with City of Napa ordinances and the Public Works Department Standard Specifications in accordance with the City of Napa Policy Resolution No. 27. The project would be implemented in accordance with all applicable measures identified in the City of Napa Policy Resolution No. 27, including providing appropriate signage, flashers, and barricades to warn oncoming motorists, bicyclists, and pedestrians of potential safety hazards at the project site and keeping pedestrian access through and/or adjacent to the project site shall remain unobstructed during project construction or an alternate route established. Additionally, the project does not propose any changes to roadways or construction of any new roadways and, therefore, would not substantially increase hazards due to a geometric design feature or incompatible uses. Mitigation Measure TRANS-2 would require that vegetation along the project frontage near the site's driveway be maintained at a height of less than 3 feet or above 7 feet to ensure adequate sight lines at the project's driveway. Therefore, the proposed project would not result in any hazards associated with its design or operation. Impacts would be less than significant with implementation of Mitigation Measure TRANS-2.

Given that implementation of Mitigation Measure TRANS-2 would fully mitigate potential impacts, and that none of the identified cumulative projects are located within the immediate vicinity (2,000 feet) of the project site, the proposed project would not contribute to a cumulatively considerable impact related to hazards associated with its design or operation. Furthermore, all cumulative projects would be designed and built in accordance with City of Napa ordinances and the Public Works Department Standard Specifications in accordance with the City of Napa Policy Resolution No. 27.

d. Would the project result in inadequate emergency access?

Less Than Significant with Mitigation Incorporated. The City of Napa Standard Specifications provide requirements to ensure that developments provide adequate access for emergency vehicles. Applicable requirements identified in these plans include minimum roadway widths of 14 feet for one-way traffic and 20 feet for two-way traffic, minimum driveway widths of 12 feet, and a maximum roadway grade of 15 percent. Additionally, at least two points for fire apparatus access shall be provided when it is determined by the Fire Chief that access by a single route might be impaired by vehicle congestion or factors that could limit ingress or egress.

The project site would be accessed via a new driveway on SR-121/Silverado Trail. The project would not generate traffic volumes that would impede emergency access. The project would not alter any established emergency vehicle routes or otherwise interfere with emergency access. The turning radius on the proposed 20-foot-wide drive aisle would accommodate maneuverability of large trucks and vehicles, including emergency vehicles. It is anticipated that all aspects of the site, including driveway widths and turning radii, would be designed in accordance with applicable standards; therefore, access would be expected to function acceptably for emergency response vehicles. However, given that the project would include one driveway for ingress/egress along SR-

121/Silverado Trail, Mitigation Measure TRANS-3, Consultation with City Fire Chief, would require coordination with the City Fire Chief regarding the adequacy of one fire apparatus access point. With implementation of Mitigation Measure TRANS-3, impacts related to emergency access would be less than significant.

Given that implementation of Mitigation Measure TRANS-3 would mitigate any potential impacts to less-than-significant levels, and that none of the identified cumulative projects are located within the immediate vicinity (2,000 feet) of the project site, the proposed project would not contribute to a cumulatively considerable impact related to emergency access. Furthermore, all cumulative projects would be designed and built in accordance with City of Napa Standard Specifications to ensure that developments provide adequate access for emergency vehicles.

Mitigation Measures

The following mitigation is required as part of the project to ensure that potential impacts to bicycle facilities are mitigated to levels that are less than significant.

TRANS-1: Dedication of Right-of-Way on SR-121/Silverado Trail. Prior to grading permit issuance, grading and excavation activities, and building permit issuance, the project applicant shall ensure that there would be sufficient right-of-way on SR-121/Silverado Trail to accommodate the planned Class II bike lane. If the existing width of the right-of-way on SR-121/Silverado Trail is insufficient to accommodate the planned Class II bike lane, the additional width needed for this planned improvement shall be dedicated as part of the project, which shall be included on project plans to the satisfaction of the City of Napa's Public Works Director.

TRANS-2: Vegetation Maintenance for Adequate Site Distance. Vegetation along the project frontage near the site's driveway shall be maintained at a height of less than 3 feet or above 7 feet to ensure adequate sight lines at the driveway.

TRANS-3: Consultation with City Fire Chief. Prior to grading permit issuance, grading and excavation activities, and building permit issuance, the project applicant shall confirm with the City Fire Chief whether an additional fire apparatus access point is required or not. If the City Fire Chief determines that an additional fire apparatus access point is required, the additional access point shall be included on project plans to the satisfaction of the City of Napa's Public Works Director and the City Fire Chief.

2.4.18 Tribal Cultural Resources

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	☐	☒	☐	☐

Environmental Setting

Prior to European settlement, the Napa Valley region was inhabited by Native Americans of the Wappo group, a population of Yukian speaking people with their own unique dialect and language. The Wappo occupation of the area dates back 10,000 years, to about 8,000 BCE, making Napa Valley one of the longest inhabited regions in California. The settlement pattern for the Wappo included permanent villages in valleys, along rivers or other waterways, organized as districts of smaller settlements or "tribelets" around "one larger and continuously inhabited town, the center of a community with some sense of political unity" (Kroeber 1925). Tribelet chiefs were elected or appointed and resided at these major villages and were responsible for maintaining relationships with other tribelets, as well as neighboring Native Tribes such as the Patwin, Pomo, and Miwok (Jones & Stokes 2005). The Wappo tribelet chief was also responsible for the management of their village, performing functions of ceremonial moderator and being the primary source for dispute resolution (Sawyer 1978).

The subsistence strategy for the Wappo was that of the hunter–gatherer, including a heavy dependence upon the acorn and other natively procured plants and the hunting of big and small game, which included bear, deer, elk, rabbits, and birds, among others. A wide variety of stone tools manufactured from locally accessible raw material sources were an important part of the

Wappo assemblage. Common tool types are projectile points, drills, knives, and scrapers of chert, basalt, or preferably, obsidian. Napa Glass Mountain, a regionally important obsidian site and quarry, and other local obsidian sources are situated within Wappo territory, a resource which greatly enhanced the trading power of this group (Jones & Stokes 2005). The basketry of the Wappo was of noted quality, made from a unique weaving technique utilizing a variety of locally accessible plant materials; this technique is believed to have originated with the Pomo, the western neighboring group of the Wappo. Houses of the Wappo were constructed of a domed framework of branches that were tied together, covered with leaves and smaller branches in the summer, and branches with mud in the winter. Animal bones and marine shells from coastal locations were used as a form of currency to fashion jewelry, beads, awls, and other functional tools (Sawyer 1978).

A pedestrian survey was conducted on March 22, 2023, to identify any unrecorded resources on the project site. The impact analysis below is based in part on the analysis and findings of the Cultural Resource Survey Report (Appendix C).

Impact Analysis

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

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

Less Than Significant with Mitigation Incorporated. As described in Section 2.4.5, Cultural Resources, the records search prepared as part of the Cultural Resource Survey Report concluded that site P-25-000928/CA-NAP-409 was recorded on the project site, adjacent to Milliken Creek on the eastern side. The site was recorded to include a lithic scatter including obsidian flakes and one obsidian projectile point fragment. When the site was revisited during a survey in 2016, no major changes were observed; however, brush clearing had occurred within the site area. Although the resource was never officially relocated, no artifacts were identified during the 2023 pedestrian survey. It is possible that the artifacts have been collected (pot hunted) by individuals accessing the property. Given the cultural sensitivity of the area and that the site is currently undeveloped, the Cultural Resource Survey Report recommended that archaeological monitoring be implemented during ground-disturbing activities associated with the proposed project. Therefore, impacts would be less than significant with implementation of Mitigation Measure CUL-1.

Given that potential impacts to historical Tribal Cultural Resources would be less than significant with implementation of Mitigation Measure CUL-1, and that none of the identified

cumulative projects are located within the immediate vicinity (2,000 feet) of the project site, the proposed project would not contribute to a cumulatively considerable impact to historical Tribal Cultural Resources.

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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less Than Significant with Mitigation Incorporated. The Native American Heritage Commission was contacted for a Sacred Lands File Check to determine whether sacred lands are present on site. The response from the Native American Heritage Commission was positive, and outreach to the list of Tribes provided was conducted on April 6, 2023.

Pursuant to AB 52, consultation was initiated with culturally affiliated Tribes on March 10, 2023. Formal consultation was conducted with the Yocha Dehe Wintun Nation, and a Tribal representative conducted a site visit per their request. At request of the Tribe, a site visit was conducted on February 14, 2024, by Ryder Dilley (Project Planner), and Socorro Reyes-Gutierrez (Tribal Cultural Monitor IV Supervisor). Following the site visit, the Tribe noted the following concerns and preferences for implementation of the proposed project:

- Ensuring all on-site workers receive cultural sensitivity training from the Tribe prior to any ground disturbance activities.
- An on-site monitor, appointed by the Tribe, be present during all grading and other earthwork activities. However, if progress is made on site, and it is clear that the likelihood of a resource being uncovered is minimal, the monitor would no longer need to be on site, but available in the event a resource is later uncovered.
- Ensuring the source for fill or soil is sterile and free of contamination.

Consultation with Yocha Dehe Wintun Nation concluded on March 6, 2024. No Tribal Cultural Resources were identified during consultation. However, given the Tribes concerns list above, the cultural sensitivity training and on-site Tribal monitoring would be required and are included in Mitigation Measure CUL-1. The evaluation of fill soils and requirement for clean fill soils would be required in accordance with Mitigation Measure CUL-1. Therefore, impacts would be less than significant with implementation of Mitigation Measure CUL-1.

Given that implementation of the Archaeological and Tribal Monitoring Program would reduce potential impacts to Tribal Cultural Resources to less than significant levels, and that none of the identified cumulative projects are located within the immediate vicinity (2,000 feet) of the project site, the proposed project would not contribute to a cumulatively considerable impact to Tribal Cultural Resources.

Mitigation Measures

The following mitigation measures are required as part of the project to ensure that impacts are mitigated to levels that are less than significant.

- CUL-1: Archaeological and Tribal Monitoring Program.

2.4.19 Utilities and Service Systems

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 wastewater 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

Water Supply and Demand

The City's Water Division of the Utilities Department is responsible for the operation, maintenance, and improvement of the municipal drinking water system serving all residents and businesses within the City and some adjacent areas. The City supplies potable water through approximately 360 miles of transmission mains and distribution piping to almost 25,700 service connections within the City limits, as well as some customers outside City limits (City of Napa 2022).

The City's water is derived from three sources: Lake Hennessey, Milliken Reservoir, and through the State Water Project (SWP). Water from these three sources is introduced into the City distribution system from three separate water treatment plants. Hennessey Water Treatment Plant treats the Lake Hennessey water. Milliken Water Treatment Plant treats Milliken Reservoir water. Edward I. Barwick Jamieson Canyon Water Treatment Plant treats the SWP water (City of Napa 2022).

Lake Hennessey: Lake Hennessey is 13 miles north of the City and is the largest local water supply source. The City's water rights to Lake Hennessey are secured through a permit from the State Water Resources Control Board (SWRCB) Division of Water Rights, which authorizes the

City to divert and store up to 30,500 acre-feet per year (AFY) from Conn Creek for the City's water customers. Lake Hennessey has an approximate storage capacity of 31,000 acre-feet (AF). The reservoir has an average yield of 17,500 acre-feet and a reliable yield of 6,300 AFY (City of Napa 2022).

Milliken Reservoir: Milliken Reservoir is 5 miles northeast of the City and is a seasonal source of supply during the high-demand summer period. The City's water rights to Milliken Reservoir are secured through a license with the SWRCB. The license authorizes the City to divert and store up to 2,350 AFY from Milliken Creek. Milliken Reservoir has an approximate storage capacity of 1,390 AF. The reservoir has an average yield and a reliable yield of 700 AFY (City of Napa 2022).

State Water Project (SWP): The SWP is the only imported water supply source for the City. The City sub-contracts with Napa County Flood Control and Water Conservation District for surface water from the SWP, which is transported from the Sacramento-San Joaquin Delta via the North Bay Aqueduct. The City has basic SWP entitlements that total 21,900 AFY. This is the maximum annual yield that the City could receive, and actual yields depend on each year's hydrologic conditions. The California Department of Water Resources estimates that 58 percent of SWP contractors' entitlements would be available during an average year. This means that Napa expects to receive 12,702 AF of its entitlements during an average year (City of Napa 2022).

Between the three water sources, the City has an expected 30,902 AFY average under normal yield. Demand projections in the City's 2020 Urban Water Management Plan include new developments associated with buildout of the 2040 General Plan Update. Table 8, Past and Projected Potable Water Demand in the City of Napa, summarizes the City's historical (2015 and 2020) and projected (2025–2045) potable water demands. Between 2020 and 2045, the City's potable demands are expected to grow approximately 10.4 percent (City of Napa 2022).

Table 8. Past and Projected Potable Water Demand in the City of Napa

Actual Volume (AFY)		Projected Volume (AFY)				
2015	2020	2025	2030	2035	2040	2045
12,034	14,092	14,230	14,655	15,005	15,330	15,555

Source: City of Napa 2022.
Notes: AFY = acre-feet per year

Wastewater and Sewer Service

The Napa Sanitation District (NapaSan) provides customers within its service boundary with wastewater disposal. NapaSan serves residents and businesses in the City of Napa, Silverado Country Club, the Napa County Airport, and several adjacent unincorporated areas. NapaSan treats 10 million gallons per day and produces 700 million gallons of recycled water annually, with a service area of 21 square miles and 270 miles of sewer mains (NapaSan 2023). NapaSan owns and

operates the sanitary sewer collection system and wastewater treatment plant that serves the City. Information about upgrades and changes to both the collection system and the wastewater treatment plant is covered in NapaSan's Collection System Master Plan and the Wastewater Treatment Plant Master Plan (City of Napa 2022).

Solid Waste and Recycling

Residential and commercial solid waste collection in the City is currently provided by Napa Recycling and Waste Services (NRWS), and its contract with the City was extended in 2018 through the end of 2031. NRWS collects residential trash, recycling, and organic waste on a weekly basis, and collects from commercial accounts weekly or more frequently as needed. NRWS also offers curbside motor oil recycling; e-waste, scrap metal, textile, and cooking oil collection through the Recycle More program; and tire, and bulky item pickup. The City owns the Napa Recycling and Compost Facility, located at 820 Levitin Way, which NRWS operates under contract with the City (City of Napa 2022).

CALGreen requires covered projects to recycle and/or salvage for reuse a minimum 65 percent of the nonhazardous construction and demolition waste or meet a local construction and demolition waste management ordinance, whichever is more stringent. The City adopted a construction and demolition debris recycling ordinance in 2010, which requires that 100 percent of identified materials be source-separated on site and recycled, and an overall minimum of 50 percent of debris from construction and demolition projects be recycled. The City also adopted a Disposal Reduction Policy in 2012, which set a goal of achieving a 75 percent level of landfill diversion rate (i.e., how much waste is recycled or recovered and diverted from the landfill) by the year 2020, in coordination with the statewide initiative of AB 341. In 2020, the City stood at a 68 percent landfill diversion rate (City of Napa 2022). Napa Municipal Code, Chapter 15.32, Construction and Demolition Debris Recycling and Diversion, requires covered projects to prepare and implement a waste reduction and recycling plan.

AB 1826 requires public entities that generate 4 cubic yards of more of commercial solid waste per week to arrange for organic waste recycling services, and AB 341 requires public entities that have trash service levels of 4 cubic yards or greater to arrange for recycling service. Additionally, the State Legislature passed Senate Bill (SB) 1383, which seeks to recover edible food from being discarded into a landfill to reduce gas emissions from the decomposing food while reducing waste and providing food to people in need. SB 1383 requires a 20 percent improvement in edible food recovery (City of Napa 2022). In 2016, the most recent year that accurate data was available, the City disposed of about 3.8 pounds of waste per resident per day into landfills, down from 6 pounds of waste per resident per day in 2007 (CalRecycle 2019a). Approximately 96 percent of the City's disposed solid waste went to Potrero Hills Landfill in Suisun City in 2016, with the small remaining tonnage going to the Clover Flat Resource

Recovery Park in Calistoga, and several other landfills throughout the area (CalRecycle 2019b) (Table 9, Permitted Active Landfills Serving the City of Napa).

Table 9. Permitted Active Landfills Serving the City of Napa

Landfill	Remaining Capacity (cy)	Year Expected to Operate Until
Potrero Hills Landfill	13.9 million	2048
Clover Flat Resource Recovery Park	2.8 million	2047

Source: CalRecycle 2019b.
Notes: cy = cubic yards

According to CalRecycle, the Potrero Hills Landfill has a remaining capacity of about 13.9 million cubic yards, and is expected to remain in operation until 2048. The Clover Flat Resource Recovery Park has a remaining capacity of about 2.8 million cubic yards, and it is expected to remain in operation until 2047 (CalRecycle 2019b). As such, there is sufficient solid waste capacity to accommodate the community through 2040.

The City is committed to promote efforts to reduce solid waste accumulation through recycling programs for new residential development and businesses, and promoting waste reduction strategies for existing residents and businesses. In coordination with the County, the City is working under an umbrella program approach to accomplish the goal of 20 percent improvement in edible food recovery in accordance with SB 1383 (City of Napa 2022).

The City of Napa Policy Resolution No. 27 includes the City's standard conditions of Project approval for all development projects, unless otherwise authorized by the City or superseded by subsequently adopted and more stringent requirements. The following measures related to utilities and service systems listed in Resolution No. 27 are applicable to the proposed project:

- Prior to trenching within existing roadway areas, the Developer's engineer shall ascertain the location of all underground utility systems and shall design any proposed subsurface utility extensions to avoid disrupting the services of such systems.
- Water and energy conservation measures shall be incorporated into project design and construction in accordance with applicable codes and ordinances (Napa Municipal Code, Chapter 15.04, Building Standards and Regulation, and Section 17.52.520, Water Efficient Landscape Ordinance).
- The project shall be connected to the Napa Sanitation District for sanitary sewer service. If the subject property is presently served by individual sewage disposal systems, the septic systems, setbacks, and reserve areas must be protected and maintained during cleaning, grading, construction, and after connection to the District, the existing septic tank(s) shall be properly destroyed.
- The project shall be connected to the City of Napa water system. Any existing well must be properly protected from potential contamination. If an existing well is to be destroyed, a well-destruction permit must be obtained from the Napa County

Department of Environmental Management by a licensed well driller. If an existing well is not destroyed, it must be properly protected and an approved backflow prevention device installed according to the Water District's specifications.

- The project shall be designed and built in accordance with the Public Works Department Standard Specification regarding the adequate conveyance of storm waters.

Impact Analysis

a. Would the project 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?

Less Than Significant Impact. The proposed project would construct a "glamping" campground with up to five permanent buildings, up to 100 fixed recreational units, a pool, recreational activity space, and a pervious parking area on an approximately 12.5-acre site. Runoff would be conveyed to vegetated areas from roof downspouts and surface flows, if any remain after infiltration from the parking lot areas and drive aisle. The natural topography of the site perimeters would not be modified, so the site would retain much of the water as it does currently. As discussed further in Sections 2.4.19(b) and 2.4.19(c), the project would not require the construction or expansion of water or wastewater treatment facilities. The project is proposing a connection to electricity with Pacific Gas & Electric for lighting, operation of the proposed pool, and operation of the proposed buildings. The proposed project does not require natural gas or telecommunications facilities. Therefore, the project would not require the construction of new or expanded facilities, which could cause significant environmental effects. Impacts would be less than significant.

Other cumulative projects within 2 miles of the project site that may require the construction of new or expanded facilities within the City (e.g., Ritz-Carlton, Bounty Hunter Building, First & Oxbow Hotel, First Street Apartments, Franklin Station Post Office, Jamboree Housing, Keller Apartments, Napa Creek Condos, Vintage Farm Subdivision). However, the project itself would not require the construction or expansion of water, wastewater treatment, natural gas, or telecommunications facilities, as described above. The proposed connection to electricity with Pacific Gas & Electric for lighting, operation of the proposed pool, and operation of the proposed buildings would not result in significant environmental effects. Furthermore, none of the identified cumulative projects are located within the immediate vicinity (2,000 feet) of the project site. Therefore, the proposed project, in combination with other cumulative projects, would not contribute to a cumulatively considerable impact related to the construction of new or expanded facilities.

b. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less Than Significant Impact. The City's Water Division of the Utilities Department provides water to the project site. Limited water required during the construction phase would be trucked in as necessary. Operation of the proposed "glamping" campground would generate water demand associated with the proposed campsites, restrooms, pool, and irrigation for landscaping and lawn areas. Water demand associated with the project would be consistent with the typical commercial campground sites. The City receives a reliable yield of 19,702 AFY from its three sources of water supply (i.e., Lake Hennessy, Milliken Reservoir, and SWP). As shown in Table 8, the City's potable water demand is expected to be less than 16,000 AFY through the year 2045. Therefore, the City would have sufficient water supplies available to serve the project, and this impact is less than significant.

There are several cumulative projects within 2 miles of the project site that would generate substantial water demand within the City (e.g., Ritz-Carlton, Bounty Hunter Building, First & Oxbow Hotel, First Street Apartments, Franklin Station Post Office, Jamboree Housing, Keller Apartments, Napa Creek Condos, Vintage Farm Subdivision). However, water demand associated with the proposed project would be relatively minimal and consistent with the typical commercial campground sites. Further, as described above, the City's potable water demand is expected to be at least 3,702 AFY less than its reliable yield of 19,702 AFY through the year 2045. Therefore, the proposed project, in combination with other cumulative projects, would not contribute to a cumulatively considerable impact related to water demand.

c. Would the project result in a determination by the wastewater 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?

Less Than Significant Impact. The majority of wastewater generated by the project would be associated with the proposed restrooms. The project would connect to the NapaSan sewer lines, which convey to NapaSan's wastewater treatment plant. The wastewater treatment plant treats approximately 10 million gallons per day and has a daily capacity of 15.4 million gallons per day, which is equivalent to approximately 131,600 single-family dwelling units (City of Napa 2022; NapaSan 2022). As such, NapaSan's wastewater treatment plant has an additional daily capacity of approximately 5.4 million gallons per day. Operation of the proposed "glamping" campground would generate minimal wastewater associated primarily with restrooms and consistent with typical commercial campgrounds. Additionally, NapaSan has reviewed the proposed project and provided a letter stating that wastewater service would be provided to the project with implementation of a number of conditions of approval, including but not limited to payment of capacity charges (Appendix H, NapaSan Service Letter). Therefore, the project would not interfere with the NapaSan's service capacity.

There are several cumulative projects within 2 miles of the project site that would generate wastewater within the City (e.g., Ritz-Carlton, Bounty Hunter Building, First & Oxbow Hotel, First Street Apartments, Franklin Station Post Office, Jamboree Housing, Keller Apartments, Napa Creek Condos, Vintage Farm Subdivision). However, generation of wastewater associated with the project would be limited to the proposed restrooms, as described above. Therefore, the proposed project, in combination with other cumulative projects, would not contribute to a cumulatively considerable impact related to wastewater generation.

d. Would the project 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?

Less Than Significant Impact. During construction of the proposed project, solid waste generation would include export of removed vegetation, including eight existing trees on-site, as well as limited packaging and waste materials used for project buildings and components. All cut soils would be graded and reused on-site, and no soil export would be required (refer to Section 1.2.2, Project Phasing and Construction). All construction debris would be recycled to the extent feasible. For example, CALGreen requires covered projects to recycle and/or salvage for reuse a minimum 65 percent of the nonhazardous construction and demolition waste or meet a local construction and demolition waste management ordinance, whichever is more stringent. The City's 2010 Construction and Demolition Debris Recycling Ordinance requires that 100 percent of identified materials be source-separated on site and recycled, and an overall minimum of 50 percent of debris from construction and demolition projects be recycled. Given that the CALGreen requirement is more stringent, the project would recycle and reuse construction materials at a minimum rate of 65 percent consistent with CALGreen. Therefore, since the amount of waste generated during construction of the project is anticipated to be minimal and the project would recycle and reuse construction materials at a minimum rate of 65 percent consistent with CALGreen, it is assumed that the solid waste generation during construction would be easily accommodated by the City's permitted solid waste capacity, which totals 16.7 million cubic yards and is predicted to be available through 2048 (CalRecycle 2019b).

The City's 2012 Disposal Reduction Policy sets a goal of achieving a 75 percent level of landfill diversion rate by the year 2020, in coordination with the statewide initiative of AB 341 (City of Napa 2022). During operation, the proposed project would generate additional solid waste when compared to the existing condition; however, the additional waste is assumed to be minimal and consistent with typical commercial campgrounds. For instance, CalRecycle's Estimated Solid Waste Generation Rates for a hotel/motel use is 4 pounds per room per day. Under a conservative assumption (worst-case scenario) of 100-percent occupancy of the 100 total recreational units for 365 days per year, the proposed project would result in a total solid waste generation of 400 pounds per day or 146,000 pounds per year. Given that the "glamping" campground is likely to maintain less than 100-percent occupancy and would not be able to operate 365 days per year (units would

be relocated and/or moved to high ground on-site during flood conditions), the actual operational solid waste generation of the proposed project is expected to be substantially smaller than this conservative estimate. Further, the combined remaining capacity of the two permitted active landfills that serve the City of Napa (Potrero Hills Landfill and Clover Flat Resource Recovery Park) is 16.7 million cubic yards (refer to Table 9) (CalRecycle 2019). Therefore, there is sufficient existing permitted solid waste capacity to accommodate the project's solid waste disposal needs, and the project would not impair the attainment of solid waste reduction goals. A less than significant impact would occur.

There are several cumulative projects within 2 miles of the project site that would generate solid waste (e.g., Ritz-Carlton, Bounty Hunter Building, First & Oxbow Hotel, First Street Apartments, Franklin Station Post Office, Jamboree Housing, Keller Apartments, Napa Creek Condos, Vintage Farm Subdivision). However, operation of the project would generate relatively minimal solid waste, and the project would not impair the attainment of solid waste reduction goals, as described above. According to CalRecycle, the landfills that serve the City (i.e., Potrero Hills Landfill and Clover Flat Resource Recovery Park) have a combined remaining capacity of approximately 16.7 million cubic yards. Therefore, the proposed project, in combination with other cumulative projects, would not contribute to a cumulatively considerable impact related to the generation of solid waste.

e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. As described above, project construction would recycle and reuse construction materials consistent with CALGreen and the City's Construction and Demolition Debris Recycling Ordinance.

The proposed project would generate municipal solid waste during project operation; however, the solid waste generated is assumed to be minimal considering the land use and would be accommodated by the City's permitted waste disposal capacity, which is predicted to be available through 2048 (CalRecycle 2019b). Trash collection at the project site would be served by NRWS, similar to the rest of the City, which would deposit all solid waste at a permitted solid waste facility. All solid waste facilities, including landfills, require solid waste facility permits to operate. Additionally, the proposed project would comply with applicable federal, state, and local regulations related to solid waste. Local regulations applicable to project operation include the City's Disposal Reduction Policy, which set a goal of achieving a 75 percent level of landfill diversion rate, in coordination with AB 341.

Applicable regulations the proposed project would comply with include AB 1826, which requires public entities that generate 4 cubic yards or more of commercial solid waste per week to arrange for organic waste recycling services; and AB 341, which requires public entities that have trash

service levels of 4 cubic yards or greater to arrange for recycling service. Additionally, the project would include compost bins for food waste in accordance with SB 1383, which requires a 20 percent improvement in edible food recovery (City of Napa 2022). Therefore, construction and operation of the project would comply with federal, state, and local statutes and regulations related to solid waste, and impacts would be less than significant.

Given that construction and operation of the project would comply with federal, state, and local statutes and regulations related to solid waste, the proposed project would not contribute to a cumulatively considerable impact related to local management and reduction statutes and regulations related to solid waste. Furthermore, all cumulative projects would be required to comply with the City's Construction and Demolition Debris Recycling Ordinance, CALGreen, AB 341, AB 1826, and SB 1383, as well as all other applicable federal and state regulations relating to solid waste.

Mitigation Measures

The analysis completed for this section indicates that no significant impacts would result from the proposed project's implementation. As a result, no mitigation measures are required.

2.4.20 Wildfire

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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

According to CAL FIRE's Fire Resources Assessment Program mapping, there are no Very High FHSZs in the City. Moderate and High FHSZs are adjacent to and surrounding the City. Additionally, a Very High FHSZ is located approximately 1.6 miles northwest of the City at the Silverado Resort. This Very High FHSZ is located approximately 1.7 miles northwest of the project site (CAL FIRE 2021). Although the City is not designated as being located within a FHSZ by CAL FIRE, the City considers wildfire to be a serious risk to life and property. In particular, the City considers the densely developed perimeters of the City along SR-121/Silverado Trail to the east and Redwood Road to the west as especially susceptible to damage from wildfires (City of Napa 2022).

The City has adopted the California Fire Code with amendments into the Napa Municipal Code. The California Fire Code stipulates fire-flow (i.e., rate of a water supply that is available for firefighting) requirements for buildings. The required fire-flow standard for commercial, industrial, manufacturing, and large apartment buildings varies from 1,500 to 8,000 gallons per minute based on the type of construction, type of use, and any built-in fire protection devices. Currently, the Napa Municipal Code (Section 13.04.340, Fire Services) does not guarantee an adequate flow-rate for fire protection purposes through regular metered service connections and fire protection devices are installed on a separate water service to be used for fire protection services only. The City currently does not have known water flow pressure or supply deficiencies (City of Napa 2022).

Clear emergency vehicle access to buildings is regulated by the adopted and amended California Fire Code and adopted City of Napa Standard Specifications and Standard Plans. Under the current California Fire Code, all portions of a building shall be within 150 feet of a serviceable fire access road. The City's Fire Code Official reviews proposed projects to ensure that adequate fire hydrant locations, water flow pressure, and access for emergency vehicles are provided (City of Napa 2022).

Impact Analysis

a. Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Less Than Significant with Mitigation Incorporated. As described in Section 2.4.9(f) and Section 2.4.17(d), the City of Napa Standard Specifications provide requirements to ensure that developments provide adequate access for emergency vehicles. Applicable requirements identified in these plans include minimum roadway widths of 14 feet for one-way traffic and 20 feet for two-way traffic, minimum driveway widths of 12 feet, and a maximum roadway grade of 15 percent. Additionally, at least two points for fire apparatus access shall be provided when it is determined by the Fire Chief that access by a single route might be impaired by vehicle congestion or factors that could limit ingress or egress.

The project site would be accessed via a new driveway on SR-121/Silverado Trail. The project would not generate traffic volumes that would impede emergency access. The project would not alter any established emergency vehicle routes or otherwise interfere with emergency access. The turning radius on the proposed 20-foot-wide drive aisle would accommodate maneuverability of large trucks and vehicles, including emergency vehicles. It is anticipated that all aspects of the site, including driveway widths and turning radii, would be designed in accordance with applicable standards; therefore, access would be expected to function acceptably for emergency response vehicles. However, given that the project would include one driveway for ingress/egress along SR-121/Silverado Trail, Mitigation Measure TRANS-3, Consultation with City Fire Chief, would require coordination with the City Fire Chief regarding the adequacy of one fire apparatus access point. With implementation of Mitigation Measure TRANS-3, the project would not substantially impair an adopted Emergency Response Plan or Emergency Evacuation Plan, and impacts would be less than significant.

Given that implementation of Mitigation Measure TRANS-3 would mitigate any potential impacts to less-than-significant levels, and that none of the identified cumulative projects are located within the immediate vicinity (2,000 feet) of the project site, the proposed project would not contribute to a cumulatively considerable impact related to conflicts with an Emergency Response Plan or Emergency Evacuation Plan.

b. Would the project, 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?

Less Than Significant Impact. As described previously, there are no Very High FHSZs in the City. Although the City is not designated as being located within a FHSZ by CAL FIRE, the City considers the densely developed perimeters of the City along SR-121/Silverado Trail to the east and Redwood Road to the west as especially susceptible to damage from wildfires (City of Napa 2022).

The proposed project would construct a "glamping" campground with up to five permanent buildings, up to 100 fixed recreational units, a pool, recreational activity space, and a pervious parking area. Approximately eight existing trees would be removed to facilitate the proposed development, which would incrementally reduce fuels and associated wildfire risk at the project site. The project does not propose any vegetation that would be considered flammable, and is required to meet applicable fire measures, such as fire apparatus access and access road requirements. Additionally, the project would include approximately 11,236 cubic yards of grading to maintain a relatively flat project site, reducing risk of wildfire due to slope. The project would be required to comply with all applicable measures outlined in the City of Napa Policy Resolution No. 27, including compliance with the Uniform Fire Code, Uniform Building Code, installation of automatic sprinkler systems conforming to National Fire Protection Association and City Standard Specifications, and all appropriate approvals from the Fire Prevention and Building Departments.

The nearest fire stations to the project site are Napa Fire Station No. 2, located approximately 1.44 miles west the project site, and the Napa County Fire Department, located approximately 1.36 miles northeast of the project site. Fire services from these stations could respond to a fire on the project site in approximately 7 minutes and 4 minutes, respectively, which are below the 8-minute required minimum response time.

Therefore, the project would not expose project occupants, such as guests or employees, to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Impacts would be less than significant.

As described above, the project is not expected to expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Additionally, none of the other cumulative projects are expected to generate substantial risks of wildfire due to the nature of the projects and urban nature of the project sites. Therefore, the proposed project would not contribute to a cumulatively considerable impact related to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

c. Would the project 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?

Less Than Significant Impact. As noted above, while there are no Very High FHSZs in the City as designated by CAL FIRE, Moderate and High FHSZs are adjacent to and surrounding the City. Additionally, a Very High FHSZ is located approximately 1.6 miles northwest of the City at the Silverado Resort. This Very High FHSZ is located approximately 1.7 miles northwest of the project site (CAL FIRE 2021). The project site is located on a vacant, undeveloped parcel in a rural area on the outskirts of the City. The project site is bordered to the west by Milliken Creek and includes two non-vegetated channels (AF-1 and AF-2) that run east to west through the southern portion of the project site where they connect to Milliken Creek to the west.

The proposed "glamping" campground would include outdoor grills set up with grates at each individual campsite to be used for cooking or socializing around the campfire at night as in a traditional camping experience. The outdoor grills would be elevated from the ground, and guests would only be allowed to use "goodwood" material, which is a compressed wood product that burns with less spark and smoke than traditional wood. This goodwood would be provided to guests staying at the site, and guests would not be allowed to bring any off-site fire burning products to the project site. Each campsite would have an interior and exterior fire extinguisher as an added fire safety item. Additionally, campground staff would remain on site at all hours and would regularly walk the property to ensure these fire reduction measures are implemented.

The two communal fire pits at the Main Office and the pool heater would utilize a single tank of propane. No other project components would require any type of gas on the project site. All buildings on the project site would be constructed and operated in accordance with the California Fire Code. Fires at the communal fire pits as well as the outdoor grills at individual campsites would not be allowed to burn on "Spare the Air" days (BAAQMD 2017).

The proposed project would ensure that access roads within the project site could provide safe access for emergency equipment and civilian evacuation and that the proposed buildings would meet current ignition resistance construction codes. Additionally, fire services would meet the travel time standards from the closest fire station.

The location of the project in relation to the open space drainages on site and Milliken Creek adjacent to the site, along with the fire reduction measures described above, would substantially improve survivability of the proposed structures from fire and reduce the chance of ignition. The City determined that the project would exceed the fire resistance and safety requirements prescribed in the California Fire Code. Therefore, based on project coordination with City staff, compliance with the County Fire Code and Consolidated Fire Code, and compliance with the Napa City Fire Department's requirements, impacts associated with fire risk would be less than significant.

Given that the project would not exacerbate fire risk, and that none of the identified cumulative projects are located within the immediate vicinity (2,000 feet) of the project site, the proposed project would not contribute to a cumulatively considerable impact associated with fire risk.

d. Would the project 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?

Less Than Significant Impact. The Stormwater Control Plan (Appendix E) prepared for the project determined that the proposed development would not significantly alter the existing drainage patterns. As discussed in Section 2.4.10, natural drainage across the site consists of sheet flow over the ground surface that concentrates in human-made surface drainage elements, such as ditches, gutters, and on-site storm drain pipes, and conveys to Milliken Creek, adjacent to the west of the project site. The project would include approximately 11,236 cubic yards of grading to maintain a relatively flat project site, reducing risk of flooding or landslides. In addition, impervious areas would be minimized to the maximum extent practicable, and parking areas, the drive aisle, and pathways are proposed as pervious materials. Therefore, the proposed project would not 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. Impacts would be less than significant.

The project would maintain the relatively flat project site and minimize impervious areas across the project site, reducing risk of flooding or landslides. Drainage across the project site be similar to existing conditions. Therefore, the proposed project would not contribute to a cumulatively considerable impact related to exposure of people or structures to significant risks, including downslope or downstream flooding or landslides.

Mitigation Measures

The analysis completed for this section indicates that no significant impacts would result from the proposed project's implementation. As a result, no mitigation measures are required.

2.4.21 Mandatory Findings of Significance

Does the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. 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. 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. Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Note: Authority cited: Sections 21083 and 21083.05, Public Resources Code. Reference: Section 65088.4, Gov. Code; Sections 21080(c), 21080.1, 21080.3, 21083, 21083.05, 21083.3, 21093, 21094, 21095, and 21151, Public Resources Code; Sundstrom v. County of Mendocino,(1988) 202 Cal.App.3d 296; Leonoff v. Monterey Board of Supervisors, (1990) 222 Cal.App.3d 1337; Eureka Citizens for Responsible Govt. v. City of Eureka (2007) 147 Cal.App.4th 357; Protect the Historic Amador Waterways v. Amador Water Agency (2004) 116 Cal.App.4th at 1109; San Franciscans Upholding the Downtown Plan v. City and County of San Francisco (2002) 102 Cal.App.4th 656.

Impact Analysis

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?

Less Than Significant with Mitigation Incorporated. Per the instructions for evaluating environmental impacts in this IS, the potential to 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, 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 were considered in the response to each question in Sections 2.4.4 and 2.4.5 of this IS/MND. In addition to project-specific impacts, this evaluation considered the proposed project's potential for significant cumulative effects. As a result of this evaluation, the proposed project was determined to have potential significant effects

related to biological resources, cultural resources, geology and soils (paleontological resources), GHG emissions, recreation, transportation, and Tribal Cultural Resources. However, mitigation has been included that clearly reduces these effects to a level below significance.

As a result of this evaluation, there is no substantial evidence that, after mitigation, significant effects associated with the project would result. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

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)?

Less Than Significant with Mitigation Incorporated. Table 10 lists past, present, and future projects located within a 2-mile radius of the project that were considered and evaluated as a part of this IS/MND.

Table 10. Cumulative Projects

Project Name	Address	Description
1-Mile Radius		
Alta East Subdivision	1568 East Avenue	5-lot SFR subdivision, 0.83 acre (Under Construction)
Ritz-Carlton	1215 Silverado Trail	351 room hotel, 21,100 sf meeting/banquet space, 9,200 sf restaurant, 14,800 sf retail, 9,000 sf spa (Entitled – Plans Not Submitted)
2-Mile Radius		
1616 E Street Tentative Parcel Map	1616 E Street	2-lot SFR parcel map, 0.24 acre, existing SFR (Entitled)
Bounty Hunter Building	1005 First Street	60-foot tall, four-story, 28,180 sf office/restaurant (Entitled – Plans Not Submitted)
Elm House Inn Addition	2337 Second Street	Conversion of existing building to four additional guest rooms, 50 sf addition (Under Review – Approved by Planning Commission/Pending City Council)
First & Oxbow Hotel	730 Water Street	123 room hotel, two 4-story buildings, 151,224 sf, 154 subterranean parking spaces (Entitled – Plans Not Submitted)
First Street Apartments II	2617 First Street	50-unit multifamily apartment complex, three 3-story buildings (Under Construction)
Franklin Station Post Office	1351 2nd Street	163 room hotel, 7,000 sf retail, former 18,010 sf post office National Register of Historic Places (Entitled – Plans Not Submitted)
Jamboree Housing - 515 Silverado Trail	515 Silverado Trail	41-unit supportive housing, 40,248 sf, 46 parking spaces, 1.05 acres (Entitled – Plans Not Submitted)
Keller Apartments	1057 Freeway Drive	24-unit multifamily apartment complex, 0.89 acre (Entitled)

Table 10. Cumulative Projects

Project Name	Address	Description
Le Petit Use Permit	15 Chapel Hill Drive	Daycare facility, up to 250 children, existing church, tenant improvements/no addition, addition of sidewalks (Tentatively entitled – Approved by Planning Commission)
Napa Creek Condos	1701 D Street Alley	48-unit residential condominiums, paved bicycle and pedestrian path (Entitled – Plans Under Review)
Pueblo Self-Storage	1890 Pueblo Avenue	321 storage units, 44,551 sf (Under Construction)
Stateline Road Smokehouse	872 Vallejo Street	Conversion of existing Quonset hut building to a restaurant, 5,492 sf (Under Construction)
Vintage Farm Subdivision Project	1185 Sierra Avenue	Demolition of existing structures, 53 single-family lots/units and 13 accessory dwelling units, 10.45 acres (Under Construction)
West Lincoln Parcel Map	2038 West Lincoln Avenue	4-lot SFR tentative parcel map, 0.84 acre, two existing SFRs (Entitled)
Westin Hotel Expansion	1274 McKinstry Street	32 room hotel expansion, 47,768 sf, 7,524 sf restaurant (Entitled – Plans Not Submitted)

Notes: sf = square feet; SFR = single-family residential

Per the instructions for evaluating environmental impacts in this IS/MND, the potential for adverse cumulative effects were considered in the response to each question in Sections 2.4.1 through 2.4.20 of this IS. In addition to project-specific impacts, this evaluation considered the proposed project's potential for significant cumulative effects. As a result of this evaluation, the proposed project was determined to have potential significant effects related to biological resources, cultural resources, geology and soils (paleontological resources), GHG emissions, recreation, transportation, and Tribal Cultural Resources. Mitigation Measures BIO-1 through BIO-7, CUL-1, GEO-1, GHG-1, and TRANS-1 through TRANS-3 would be implemented as part of the proposed project to mitigate these impacts to less-than-significant levels. All other potential impacts of the proposed project were determined to be less than significant without the need for mitigation.

As a result of this evaluation, there is no substantial evidence that, after mitigation, the proposed project would result in any significant impacts that would substantially combine with impacts of other current or probable future impacts. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant with Mitigation Incorporated. In the evaluation of environmental impacts in this IS/MND, the potential for adverse direct or indirect impacts to human beings were considered in the response to certain questions in Section 2.4.1, Aesthetics; Section 2.4.3, Air

Quality; Section 2.4.7, Geology and Soils; Section 2.4.9, Hazards and Hazardous Materials; Section 2.4.10, Hydrology and Water Quality; Section 2.4.13, Noise; Section 2.4.14, Population and Housing; Section 2.4.17, Transportation; and Section 2.4.20, Wildfire. As a result of this evaluation, the proposed project was determined to have potential significant effects related to biological resources, cultural resources, geology and soils (paleontological resources), GHG emissions, recreation, transportation, and Tribal Cultural Resources. However, mitigation has been included that clearly reduces these effects to a level below significance. Therefore, there is no substantial evidence that, after mitigation, there are adverse effects to human beings associated with the project. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

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Appendix A. Air Quality and Greenhouse Gas Emissions Modeling Assumptions and Results

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Appendix B. Biological Resources Technical Report

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Appendix C. Cultural Resource Survey Report

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Appendix D. Grading and Site Plans

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Appendix E. Stormwater Control Plan

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Appendix F. Roadway Construction Noise Model Results

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Appendix G. Transportation Impact Study

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Appendix H. NapaSan Service Letter

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Appendix I. Text Amendment

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