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# Zinfandel Subdivision Project

# FINAL Mitigated Negative Declaration

***State Clearinghouse Number 2025080319***

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# 1 - INTRODUCTION

Although not required by the California Environmental Quality Act (CEQA), the City of Napa (City) has prepared the following responses to significant environmental comments received on the Zinfandel Subdivision Project Draft Mitigated Negative Declaration (Draft MND). The Responses to Comments and Errata, which are included in this document, together with the Draft MND, Draft MND appendices, and the Mitigation Monitoring and Reporting Program (MMRP), comprise the Final MND for use by the City in its review and consideration of the Zinfandel Subdivision Project. All public comments regarding the Draft MND are included for consideration by the City of Napa, Napa County.

This document is organized into four sections:

- **Section 1—Introduction.** Provides an introduction to the Final MND.
- **Section 2—Master Responses:** Provides single, comprehensive responses to similar comments about a particular topic.
- **Section 3—Responses to Written Comments:** Provides a list of the agencies, organizations, and individuals who commented on the Draft MND. Copies of all of the letters received regarding the Draft MND and responses thereto are included in this section.
- **Section 4—Errata:** Includes an addendum listing refinements and clarifications on the Draft MND, which have been incorporated.

The Final MND includes the following contents:

- Draft MND (provided under separate cover)
- Draft MND appendices (provided under separate cover)
- Master Responses, Responses to Written Comments, and Errata (Sections 2, 3, and 4 of this document)
- Final MND appendices
- Mitigation Monitoring and Reporting Program (provided under separate cover)

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# 2 - MASTER RESPONSES

Master Responses address similar comments made by multiple public agencies, businesses, organizations, or individuals through written comments submitted to the City of Napa (City). Master Responses are incorporated into the Final Mitigated Negative Declaration (MND).

## 2.1 - List of Master Responses

- Master Response 1—Support for the Proposed Project
- Master Response 2—Non-CEQA Issues Not Addressed in the Final MND
- Master Response 3—General Opposition Comments Not Addressed in the Final MND
- Master Response 4—Clarifying Information on the Air Quality Analysis
- Master Response 5—Clarifying Information on the Biological Resources Analysis
- Master Response 6—Clarifying Information on the Hazardous Materials Analysis
- Master Response 7—Clarifying Information on the Stormwater Analysis
- Master Response 8—Clarifying Information on the Noise Analysis
- Master Response 9—Clarifying Information on the Transportation Analysis

## 2.2 - Master Responses

### Master Response 1—Support for the Proposed Project

***Summary of Relevant Comments***

Several commenters expressed support for the proposed project, emphasizing its potential to address the City's housing shortage and contribute positively to the community. Supportive letters highlighted the proposed project's thoughtful design, compatibility with the surrounding neighborhood, and inclusion of landscaping and open space. These commenters appreciated the balance between development and environmental considerations, viewing the proposed project as a well-planned addition to the area that aligns with broader community needs.

***Response***

While an MND is not required to include a detailed discussion of project benefits under the California Environmental Quality Act (CEQA), the City may consider such benefits as part of the public review process. Public Resources Code Section 21082.4 expressly authorizes environmental review documents, including MNDs, to consider "specific economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of a proposed project and the negative impacts of denying the project." The CEQA Guidelines also support this approach in Section 15124(b), which allows for the inclusion of a statement of project objectives and benefits.

Comments in support of the proposed project will be forwarded to the decision-makers. The City notes that the commenter's supportive feedback and perspectives are valuable and have been considered in the preparation of the Final MND. The City remains committed to ensuring that the proposed project contributes positively to the community while minimizing environmental impacts.

## Master Response 2—Non-CEQA Issues Not Addressed in the Final MND

### *Summary of Relevant Comments*

Several commenters commented on issues that either (1) reference environmental issues generally related but outside of the scope of recognized CEQA frameworks discussed in the Draft MND and associated documents; or (2) relate to social, economic, or general health and safety topics that are not project impacts on the physical environment and thus fall outside the scope of CEQA. Generally, these comments, referred to herein collectively as "Non-CEQA Issues," involve, but are not limited to, the following topics:

- General concerns regarding quality of life that are not tied to a specific significance threshold;
- Economic effects or other similar perceived impacts to property values; and
- Social effects or other similar concerns related to the "right to privacy."

This Master Response addresses why these non-CEQA issues are not further addressed in the Final MND and confirms that these comments will nonetheless be included in the administrative record and provided to City decision-makers for consideration during the proposed project's public hearing process.

### *Response*

In compliance with CEQA, the Draft MND evaluates the potential for the proposed project to adversely impact the physical environment based upon an assessment of identified significance thresholds.

Additionally, as demonstrated in the MND, the City utilized the criteria in CEQA Guidelines Appendix G Environmental Checklist to determine whether the proposed project would have a significant environmental impact related to each environmental topical area. A lead agency may exercise its discretion and apply standards centered on its own determination of appropriate thresholds of significance, based on substantial evidence in the record, when deciding whether a project's environmental impacts are significant. (*Rominger v. County of Colusa* (2014) 229 Cal.App.4th 690, overruled in part on other grounds by *Union of Med. Marijuana Patients, Inc. v. City of San Diego* (2019) 7 Cal.5th 1171). In the MND prepared for the proposed project, the Lead Agency elected to analyze the proposed project against the Appendix G Environmental Checklist significance thresholds to ultimately make a significance finding for each topical area, which is the City's standard practice for environmental documents, including MNDs and EIRs.

Several commenters have discussed concerns that could be generally characterized as relating to a specific topical section, but these comments do not specifically relate or apply to any of the thresholds utilized by the Lead Agency and detailed in CEQA Guidelines Appendix G or otherwise specifically

connect the identified concerns to an adverse physical impact to the environment. For example, some commenters discussed concerns related to inadequate vehicular parking or purported shade and shadow issues that could be generally characterized as relating to a general environmental topical area but do not identify any specific environmental issue or otherwise relate or apply to any of applicable significance thresholds. Comments on general concerns that do not specifically identify a potential adverse impact to the physical environment or otherwise relate to a specific significance threshold are not within the scope of the Draft MND and/or otherwise within the purview of CEQA and therefore will not be further responded to in the Final MND.

For the reasons explained above, the Final MND will not provide further responses to comments on non-CEQA issues. However, each comment will be included in the administrative record on the proposed project and will be provided to City decision-makers for consideration as part of the public hearing process on the proposed project. In this regard, while the City is not obligated to respond in writing to each comment received on the proposed project, the City will review, evaluate, and consider, as determined appropriate, all comments received as part of the decision-making process. See also Master Response 3, General Opposition Comments Not Addressed in the Final MND. No changes are warranted, and no further response is required.

## Master Response 3—General Opposition Comments Not Addressed in the Final MND

### *Summary of Relevant Comments*

Several commenters expressed general opposition to the merits of the proposed project but did not raise any significant environmental issues related to the adequacy of the environmental impact analysis; and/or objected generally regarding the adequacy of the environmental impact analysis but did not provide a specific basis to support the asserted inadequacy. (Public Resources Code § 21091(d)(2)(B)). The City reviewed all such general comments and prepared this Master Response to address them. Comments that were more specific in nature and provided supporting information are addressed in the individual, unique responses included in Section 3. The general comments addressed in this Master Response fall into one of several categories:

- The comment generally objected to either the merits of the entire proposed project, or a portion thereof, but did not raise any specific environmental issues related to the adequacy of the environmental impact analysis;
- The comment generally objected to the proposed project based on social or other non-environmental grounds;
- The comment broadly identified environmental topics and requested additional evaluation but did not provide supporting information;
- The comment asked for additional studies, mitigation, or alternatives without explanation, supporting information, or rationale;
- The comment presented generalized claims challenging the adequacy of the analysis in the Draft MND and associated documents which were not supported by data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts; and

- The comment stated an opinion, speculation, or conclusion regarding the merits of the proposed project but did not (1) provide any rationale, or (2) raise any issues related to the adequacy of the environmental impact analysis.

The foregoing types of comments received in response to the Draft MND are referred to herein collectively as "general opposition" and are the focus of this Master Response.

***Response***

As discussed in Master Response 2: Non-CEQA Issues Not Addressed in the Final MND, CEQA requires that reviewers commenting on a Draft Negative Declaration (ND) or MND focus on the proposed finding that the project, including any mitigation measures, would not result in a significant environmental effect (CEQA Guidelines § 15204(a)).

Under CEQA, the Lead Agency is required to consider all comments received during the public review period but is not required to prepare formal written responses to those comments (Public Resources Code §§ 21091(d), (f); CEQA Guidelines § 15074(b)). Nonetheless, the City has elected to provide written responses to comments that raise substantive environmental issues. This is done to promote transparency and clarify how such concerns were considered during the environmental review process. However, this practice should not be interpreted as a legal requirement or precedent for future City documents.

CEQA Guidelines Section 15204(b) advises that if a reviewer believes a project may result in a significant environmental effect, they should:

- Identify the specific effect;
- Explain why they believe the effect would occur; and
- Explain why they believe the effect would be significant.

Further, CEQA Guidelines Section 15204(c) states that reviewers should explain the basis for their comments and submit supporting data, references, or expert opinion based on facts. Comments that are speculative, unsupported by evidence, or general in nature may be rejected or addressed with a general response. CEQA Guidelines Section 15204(e) clarifies that while this section does not restrict broader commentary, the Lead Agency retains discretion to reject comments that are not focused as recommended.

Accordingly, the CEQA statute and caselaw are clear that responses to comments should be limited to evaluating significant adverse physical impacts on the environment (CEQA Guidelines § 15604(e), 15131(a), 15131(b)). In accordance with *City of Long Beach v. Los Angeles Unified School District* (2009) 176 Cal.App.4th 889, 901, the level of detail required in a response depends on the significance of the issue raised, the detail of the comment, and whether the matter is already addressed in the environmental document or other responses. Accordingly, a general response to a general comment is legally sufficient under CEQA. Comments expressing general support or opposition to the project, or those focused on economic, social, or political considerations, fall outside

the scope of CEQA and are not addressed in detail in these responses. These comments are noted in the administrative record and will be available to decision-makers during the public hearing process. Where a comment reflects personal opinion, generalized opposition, or unsubstantiated assertions about the adequacy of the Draft MND, the City acknowledges the comment for informational purposes but, because the comment lacks substantial evidence regarding potential impacts of the proposed project on the physical environment, no further analysis is necessary and no revisions to the Draft MND are required. Similarly, suggestions for general mitigation that are not project-specific are not addressed in detail. All comments received during the public review period are included in the administrative record and will be considered by the City's decision-makers as part of the public hearing process. The City will review, evaluate, and consider all comments as appropriate in making a final determination on the proposed project.

## Master Response 4—Clarifying Information on the Air Quality Analysis

### *Summary of Relevant Comments*

A few commenters expressed general concerns about air quality impacts associated with construction activities for the proposed project. These concerns included potential health risks from dust emissions, especially for nearby residents and sensitive receptors. The comments were based on opinion and speculation and did not include substantial evidence to support the statements. The comments emphasized the need for robust mitigation measures to control fugitive dust and ensure compliance with applicable air quality standards during grading and construction phases. Commenters also questioned whether the Consistency Checklist adequately addressed cumulative air quality impacts and suggested that further analysis may be warranted.

### *Response*

The proposed project's air quality analysis, as documented in Section 4.3, Air Quality, of the CEQA Guidelines Section 15183 Consistency Checklist (Consistency Checklist), evaluated both construction and operational emissions in accordance with the Bay Area Air Quality Management District (Bay Area Air District) CEQA Guidelines and applicable State and federal standards.

During construction, activities such as demolition, grading, and building could generate dust (fugitive particulate matter) and exhaust emissions. The analysis determined that, with implementation of standard Best Management Practices (BMPs) and compliance with Napa Policy Resolution No. 27, fugitive dust emissions would be minimized and would not result in significant impacts. These BMPs include measures such as regular watering exposed soils, covering haul trucks, minimizing idling of equipment, and promptly cleaning up spills and debris. The proposed project would also be required to use only Tier 4 engines in off-road equipment and cleaner heavy-duty trucks, further reducing emissions of particulate matter and nitrogen oxides.

Quantitative modeling of construction emissions showed that all criteria pollutants, including reactive organic gases (ROG), nitrogen oxides ($NO_X$), and particulate matter ($PM_{10}$ and $PM_{2.5}$), would remain well below Bay Area Air District significance thresholds. A Health Risk Assessment (HRA) was also conducted, which found that cancer and non-cancer risks from diesel particulate matter (DPM) and

$PM_{2.5}$ at the nearest sensitive receptors (residences and Willow Elementary School) would be below regulatory thresholds.

For long-term operations, the proposed project's emissions would also be below significance thresholds, and no substantial air quality impacts are anticipated. The proposed project incorporates additional features to reduce air quality impacts, such as energy-efficient building design, landscaping, and pedestrian/bicycle connectivity.

In summary, with adherence to required dust control measures, use of clean construction equipment, and compliance with all applicable air quality regulations, the proposed project's construction and operational air quality impacts, including those related to dust, would be less than significant.

CEQA case law supports the Lead Agency's discretion in determining whether mitigation suggested during the public comment period is necessary. In *Oakland Heritage Alliance v. City of Oakland* (2011) 195 Cal.App.4th 884, the court emphasized that agencies are not required to adopt every suggested mitigation measure, particularly when the impact is not significant or when the agency has already committed to effective mitigation. Here, the Consistency Checklist demonstrates that the proposed project would have less than significant impacts. No further mitigation is required beyond the standard measures already incorporated into the proposed project and required by the City and regulatory agencies.

## Master Response 5—Clarifying Information on the Biological Resources Analysis

### *Summary of Relevant Comments*

Several commenters expressed concerns about the biological resources analysis within the Draft MND. Specifically, commenters expressed concerns about potential impacts to salmon migration and spawning in Salvador Channel, questioning the adequacy and currency of biological data and surveys used in the proposed project's analysis. Many highlighted the creek's role as a wildlife corridor and detailed the presence of various wildlife species, including river otters, beavers, pond turtles, nesting birds, and bats, raising worries about their well-being during and after construction. There were repeated concerns about the removal of trees, with requests for higher mitigation ratios and longer monitoring periods, and questions about how tree replacement would be handled. Some commenters also raised issues about increased use of the planned path, cumulative impacts not being fully analyzed, and whether mitigation measures were specific, feasible, and enforceable under CEQA Guidelines.

### *Response*

*Salmon*

The Napa Watershed Information and Conservation Council's current website reports that in the 1960s Coho salmon had been extirpated from the Napa River Watershed. No records of occurrences within the California Natural Diversity Database (CNDDB) are present for either species in or around the project area within Salvador Channel. According to the Southern Napa River Watershed Restoration Plan by the California Department of Fish and Wildlife (CDFW), Chinook salmon in the area spawn in Reach 2 and 3, which is downstream of the project site.

According to Napa County Resource Conservation District's Napa River Watershed Steelhead and Salmon Monitoring Program's spawning and habitat graphic, Salvador Channel is not considered spawning habitat, especially within this reach. This is due to the poor quality of habitat, with mud rather than gravel, heavy modification, and poor water quality. While Salvador Channel may receive some migratory salmon, no successful salmon spawning is known to be present within this reach of Salvador Channel.

The proposed project has two components, a development component and a restoration component. The changes proposed for Salvador Channel are included in the restoration component. The current channel is narrow and is confined by concrete and rip rap along its slopes, which are detrimental to the health of the creek and anadromous fish, such as salmon. The proposed restoration would broaden the channel and create a floodplain, increase capacity, and provide native wetland and riparian plantings to restore habitat for wildlife and fish, including Chinook salmon, and improve the health and functioning of this reach of creek.

*Salvador Channel as a Wildlife Corridor*

Salvador Channel and the surrounding riparian area are noted as being a likely wildlife movement corridor, especially due to the developed areas in the surrounding area. Temporary impacts (approximately 0.20 acre) are anticipated during project construction; however, post-construction, the riparian corridor would be broadened, resulting in more area availability, improved habitat, and an overall improvement for wildlife movement, although approximately 0.01 acre of permanent impacts to riparian habitat would occur.

During the construction of the flood overflow terrace and walking path, approximately 0.20 acre of temporary impacts would occur. However, these temporary impacts would be mitigated through species-specific surveys, potential monitoring, and the placement of exclusionary fencing around the project area. Through project implementation, the habitat in the area would be improved due to increased flood capacity, better native coverage, etc. Construction would result in a broader floodplain with increased wetland and riparian habitat, thus enhancing and expanding on protected habitats within the project site. Work within the creek would remove artificial substrates, such as concrete and debris, as well as invasive vegetation, such as Himalayan blackberry. A habitat mitigation plan for any permanent riparian impacts was prepared and revisions were provided in response to comments from the CDFW) and the Regional Water Quality Control Board (RWQCB) prior to the publication of the MND. The restoration would benefit a variety of wildlife in the area, including fish, river otters, beavers, pond turtles, and bird species.

Northwestern pond turtle was observed on-site during a field visit in 2024. To prevent any impacts to the species, Mitigation Measure (MM) BIO-1a is included in the MND, which requires pre-construction surveys and the placement of exclusionary fencing. Additionally, nesting birds and bats have the potential to nest/roost within the project site. MM BIO-1b and MM BIO-1c detail pre-construction survey requirements, as well as potential buffer zone implementation and two-step tree removal processes to prevent any potential impacts or take to any bird or bat species during project construction.

*Data Adequacy*

Information used in all biological reports included the best available data and information from State and federal agencies at the time of the reports in 2024. Site conditions and field observations were also considered in all reviews. Accordingly, this information is recent and valid according to agency policies.

*Tree Removal and Mitigation*

Please refer to Section 4, Errata, of this Final MND for clarification regarding the number and location of trees being proposed for removal by the proposed project. Forty-two trees are being proposed for removal, and as detailed below, the mitigation measures circulated for public review and included in the MND would fully reduce potential impacts to less than significant levels. No mitigation measures or project revisions must be added to reduce the potential impact to insignificance (see also Appendix A of this Final MND).

"A lead agency is required to recirculate a negative declaration when the document must be substantially revised after public notice of its availability has previously been given pursuant to Section 15072, but prior to its adoption." (CEQA Guidelines § 15073.5(a)). In this case, while revisions were made to the MND for clarification, no mitigation measures or project revisions must be added to reduce potential impacts in response to comments. Therefore, although the number of trees proposed for removal has been corrected and more trees would be removed than previously identified, the MND does not require any substantial revisions, and recirculation would not be required pursuant to CEQA Guidelines Section 15073.5.

The City's Municipal Code identifies a "protected native tree" as a native tree species, including valley oak and coast live oak, 12 inches or greater in diameter. Of the trees planned for removal or with the potential to be impacted by the proposed project, only two are protected native trees as defined by the City's Municipal Code (Tree Nos. 1 and 9). The diameter of the rest of the existing trees did not meet the qualifications for the City's Protected Native Tree designation.

Tree No. 9 (an approximately 14.2-inch valley oak at the top of the creek bank) would be removed and mitigated in accordance with the City's Municipal Code requirements outlined in the MND as MM BIO-5a.

Tree No. 1 (a multi-trunk coast live oak on the property boundary) would be preserved and protected by the establishment of Tree Protection Zones (TPZs) as detailed in MM BIO-5b of the MND.

The removal of any native riparian tree would be mitigated at a replacement ratio determined by the regulatory agencies, along with 5-year monitoring for the success of the trees (MM BIO-2 and MM BIO-5a). These ratios are typically industry standard and are reflective of the current habitat and available area. Additionally, TPZs (equal to 1 foot per 1 inch of trunk diameter) would be established to ensure the protection of preserved trees in and around the project area (MM BIO-5b).

Ornamental trees in the project site are not accounted for in mitigation measures due to the fact that removal of these trees and the establishment of native trees within the project site would serve to

improve habitat with more native coverage, thus rendering the project site more suitable for native species using the surrounding habitat. Additionally, a habitat mitigation plan for permanent riparian impacts was prepared and updated in response to comments from the CDFW and RWQCB, which would result in ecological improvements to the creek and riparian zone.

*Proposed Trail Use and Cumulative Impacts*

The project region is within the developed portion of the City and is impacted by the existing urbanization of its surroundings. As the commenters noted, this is already an area of high use. In addition, much of the area is without an existing path, so the use is spread into the creek zone rather than limited to a dedicated path. The planned path would help focus the use onto the path and keep a larger proportion of use out of the natural areas, including the creek. The restoration of the creek and associated riparian corridor would be a net benefit for the ecology of the creek system.

None of the comments raising biological issues provided new substantial evidence or project-specific environmental concerns that would require substantial revisions to the MND. As such, they do not trigger recirculation under CEQA Guidelines Section 15073.5. The MND remains adequate in its analysis and conclusions regarding biological resources.

## Master Response 6—Clarifying Information on the Hazardous Materials Analysis

### *Summary of Relevant Comments*

Several commenters expressed concerns about the potential for hazardous materials and soil contamination at the project site. Specifically, comments noted the historic use of the property for agricultural purposes, which may have involved the application of pesticides and petroleum products, raising the possibility of residual contamination in the soil. Commenters also pointed out that while a Phase I Environmental Site Assessment (Phase I ESA) was conducted, a Phase II ESA, which would involve subsurface soil sampling and laboratory analysis, had not been completed to confirm the absence or presence of contamination. The lack of a Phase II ESA was cited as a gap in the environmental review process, with commenters urging that further investigation be conducted to ensure that future residents and construction workers are not exposed to hazardous substances. These concerns emphasize the need for additional site assessment and, if necessary, remediation measures to protect public health and comply with regulatory standards.

### *Response*

As detailed in Section 4.9, Hazards and Hazardous Materials, and Appendix E, Hazards and Hazardous Materials Supporting Information, of the Consistency Checklist, a Phase I ESA was conducted in accordance with American Society for Testing and Materials (ASTM) standards. The only Recognized Environmental Condition (REC) identified was the area around two aboveground fuel storage tanks (ASTs) used for gasoline and diesel. These tanks were in good condition, with secondary containment, and no evidence of spills or staining was observed.

To address any residual uncertainty, a limited subsurface investigation (soil trenching) was performed in January 2018 at the locations of both current and historical ASTs. The environmental professional

observed no evidence of petroleum hydrocarbon staining or odors in any of the trenches and concluded that no significant release had occurred and no further investigation was warranted.

No other RECs, such as evidence of hazardous materials, underground storage tanks, or significant pesticide contamination, were identified on the project site. The project site is not listed on any federal or State hazardous materials or contamination databases, and no off-site sources of contamination were identified as a risk.

Pursuant to a September 11, 2025 letter from the California Department of Toxic Substances Control (DTSC), an additional Soils and Hazardous Building Materials Investigation Report (Soils Investigation Report) was prepared for the proposed project in response to DTSC comments received on the Draft MND by CKG Environmental, Inc., dated November 2025 (Appendix B of this Final MND). The Soils Investigation Report confirms that there do not appear to be concerns associated with potential former smudge pot usage or with potential former pesticide mixing areas.

The Phase 1 ESA anticipated the presence of lead-based paint (LBP) on the project site and the MND acknowledges this potential (see e.g., Appendix A, p. 110). The Soils Investigation Report identified that there are limited areas where shallow soil contains elevated lead concentrations likely due to LBP on older buildings (existing and former). In compliance with Title 17, California Code of Regulations, Division 1, Chapter 8, Sections 36000 and 36100, the United States Environmental Protection Agency (EPA) Lead Renovation, Repair and Painting Program, and the California Occupational Safety and Health Administration (Cal/OSHA), the site developer would be required to work with Napa County Environmental Health to oversee and accept a soil mitigation plan to address the elevated lead. After buildings are demolished and slabs are removed, a thin layer of soil would be scraped into a stockpile. The stockpile would then be sampled and profiled for disposal at an appropriate facility depending on the results of that sampling. Soil sampling would be completed to confirm that the soil with elevated lead has been removed.

Hazardous building materials including asbestos-containing and lead-based materials were identified and mapped at the project site. Compliance with existing federal and State regulations for these hazardous building materials would be required and would reduce any potential impacts to less than significant levels.

Based on the Phase I ESA, the follow-up soil trenching, and the Soils Investigation Report, the proposed project would comply with all applicable regulations related to hazardous materials to ensure that potential impacts would be less than significant.

## Master Response 7—Clarifying Information on the Stormwater Analysis

### *Summary of Relevant Comments*

Several commenters expressed concerns about the proposed project's potential impacts on stormwater management, flooding, and hydrology. Many noted the potential risk of increased flooding in the Salvador Channel area and nearby neighborhoods due to the addition of impervious surfaces and changes to site grading. Several comments raised concerns about whether the proposed

stormwater infrastructure and bioretention areas would be sufficient to manage runoff, especially during heavy rain events, and whether the proposed project's design adequately accounted for climate change and more frequent extreme weather. Some comments referenced a history of localized flooding in the area and questioned whether the proposed project could worsen these conditions.

Additionally, commenters questioned the adequacy of the proposed project's hydrologic modeling and requested more detailed analysis of pre- and post-development runoff rates, as well as assurances that the proposed project would not increase downstream erosion or degrade water quality in Salvador Channel or the Napa River. There were also requests for the proposed project to incorporate Low Impact Development (LID) features, ensure compliance with local and regional stormwater regulations, and provide ongoing maintenance of stormwater facilities. Some suggested that additional mitigation measures or design modifications may be needed to further reduce the risk of flooding and protect both existing residents and sensitive environmental resources.

***Response***

Prior to publication of this MND, these concerns were carefully evaluated through detailed technical studies, including a Stormwater Control Plan, Preliminary Detention Calculations, and a comprehensive Hydraulic Analysis, all of which were subject to independent peer review.

The proposed project's stormwater management approach is designed to comply with the City's drainage standards and the Phase II Municipal Stormwater National Pollutant Discharge Elimination System (NPDES) permit. The Stormwater Control Plan incorporates multiple LID strategies, including the use of bioretention facilities, minimization of impervious surfaces, preservation of natural drainage features, and the use of self-treating landscape areas. Runoff from new impervious surfaces would be routed to four bioretention/detention facilities, which are sized and designed in accordance with the Bay Area Stormwater Management Agencies Association (BASMAA) Post-Construction Manual. These facilities would treat stormwater for both water quality and trash capture and would detain flows to ensure that post-development peak discharges do not exceed pre-development rates for up to the 100-year storm event.

The hydraulic and hydrologic analyses demonstrate that the proposed project would not increase flood risk on-site or to adjacent properties. The proposed project includes grading and terracing along Salvador Channel, elevating building pads above the 100-year floodplain, and restoring riparian areas with native vegetation. Modeling results show that, for the 2-, 10-, and 100-year flood events, changes in water surface elevations and inundation extents are minimal, generally less than 0.1 foot at off-site locations, and do not result in increased flood risk to existing structures. The design also avoids significant reductions in overbank flows at Lassen Street, thereby preventing downstream impacts. Peer review by Balance Hydrologics confirmed that the technical analyses and modeling are consistent with industry standards and City requirements and that the proposed project can fully reduce potential impacts related to water quality, hydromodification, and peak flows.

Ongoing maintenance of stormwater facilities would be required and enforced through an Operations and Maintenance Plan and agreement with the City. The proposed project would also comply with all

applicable source control and operational BMPs to minimize pollutant loading to Salvador Channel and the Napa River.

In summary, the proposed project's stormwater and flood management measures have been carefully designed and independently reviewed to ensure that the proposed project would not increase flooding or degrade water quality and would comply with all local and State regulatory requirements. Any future design refinements would continue to be subject to City and regulatory agency review to ensure continued compliance and protection of public and environmental health.

## Master Response 8—Clarifying Information on the Noise Analysis

### *Summary of Relevant Comments*

Several commenters expressed concerns about both construction and operational noise, as well as vibration impacts, associated with the proposed project. Many noted that grading and heavy equipment operations would occur close to existing homes and Willow Elementary School, raising the risk of excessive noise and disruption for residents and students. Requests were made for stricter limits on construction hours, such as prohibiting work during evenings and weekends, and for the use of temporary noise barriers to protect sensitive receptors. Some letters specifically cited that predicted construction noise levels could exceed local residential limits and argued that the analysis underestimated the impact on nearby homes and schools. Concerns about vibration focused on the potential for damage to adjacent properties, especially those with zero lot line separation, and the need for a construction staging plan to address these risks.

In addition to construction impacts, commenters raised issues about long-term operational noise, including increased traffic, mechanical equipment, and general activity from new residences. Several commenters also requested real-time noise monitoring, a complaint response protocol, and more robust mitigation measures to address community concerns during both construction and operation of the proposed project.

### *Response*

The City acknowledges comments regarding potential noise and vibration impacts associated with both construction and operation of the proposed project. These concerns were carefully evaluated in the Consistency Checklist prepared for the proposed project and in Appendix G, Noise Supporting Information.

*Construction Noise and Vibration*

Construction activities, including grading, excavation, and building, would generate temporary increases in noise levels, particularly near existing homes and Willow Elementary School. The noise analysis modeled worst-case scenarios for heavy equipment operating near sensitive receptors. At the closest residences (approximately 40 feet from construction), maximum noise levels could reach up to 87 A-weighted decibels (dBA) ($L_{max}$) and hourly averages up to 85 dBA ($L_{eq}$) if multiple pieces of equipment operate simultaneously. However, these levels would only occur intermittently and would decrease as equipment moves across the project site. At Willow Elementary School (about 360 feet away), maximum noise levels are projected to be up to 68 dBA ($L_{max}$) and hourly averages up to 60

dBA ($L_{eq}$), well below the Federal Transit Administration's (FTA's) 8-hour average threshold of 80 dBA for schools and residences.

The proposed project would comply with the City's Municipal Code, restricting construction to daytime hours (8:00 a.m. to 5:00 p.m. weekdays, 8:00 a.m. to 4:00 p.m. weekends/holidays), and would implement BMPs, such as maintaining mufflers, using acoustical shielding where feasible, and shutting down equipment when not in use. These measures would further reduce noise exposure for nearby residents and students. The analysis concluded that, with these measures, construction noise impacts would be less than significant and would not exceed established standards.

For vibration, the analysis used FTA criteria and found that the highest vibration levels from small vibratory rollers would be well below the threshold for potential structural damage at the nearest homes (0.012 inches per second [in/sec] peak particle velocity [PPV] vs. the 0.2 in/sec threshold). No pile driving or other high-vibration activities are planned. Therefore, construction vibration impacts are also considered less than significant.

*Operational Noise*

Long-term operational noise sources include mechanical equipment (e.g., heating, ventilation, and air conditioning [HVAC] units) and increased vehicle traffic. The analysis found that mechanical equipment would generate noise levels below 45 dBA at the nearest property lines, well under the City's 60 dBA compatibility standard for residential uses. Project-related traffic would not increase ambient noise levels by more than 1 dBA, which is below the threshold for a perceptible or significant change. Thus, operational noise impacts are also less than significant.

*Mitigation and Monitoring*

CEQA case law supports the Lead Agency's discretion in determining whether mitigation suggested during the public comment period is necessary. In *Oakland Heritage Alliance v. City of Oakland* (2011) 195 Cal.App.4th 884, the court emphasized that agencies are not required to adopt every suggested mitigation measure, particularly when the impact is not significant or when the agency has already committed to effective mitigation. Here, the MND demonstrates that the proposed project would have less than significant impacts. The proposed project would comply with all applicable City noise ordinances and implement standard noise control measures during construction. No additional mitigation is required beyond these measures as the technical analysis demonstrates that both construction and operational noise and vibration impacts would remain below significant thresholds for sensitive receptors, including nearby homes and schools.

*Summary*

In summary, the proposed project's noise and vibration impacts have been thoroughly analyzed and would be managed through compliance with City regulations and BMPs. With these measures in place, the proposed project would not result in significant noise or vibration impacts during construction or operation.

## Master Response 9—Clarifying Information on the Transportation Analysis

### *Summary of Relevant Comments*

Several commenters raised concerns about the proposed project's impact on traffic congestion and safety, particularly along El Centro Avenue near Willow Elementary School. Commenters described El Centro Avenue as already heavily trafficked and expressed concern that the addition of the proposed project's homes could worsen existing bottlenecks, especially during school drop-off and pick-up times. Commenters expressed safety concerns for children who walk or bike to school, emphasizing the need for improved pedestrian and bicycle infrastructure. The traffic study used in the environmental analysis was criticized for being outdated (from 2019), conducted prior to the COVID-19 pandemic and the implementation of SB 743 Vehicle Miles Traveled (VMT) thresholds. Commenters noted that the study did not reflect current traffic patterns or include a Safe Routes to School analysis, which they felt was essential given the proximity to the school.

Additional concerns focused on the loss of public access to the creekside area, which had been envisioned in the City's bicycle and pedestrian plan as a Class I trail connection. Instead, the commenters claim that the area is now proposed as private Homeowner's Association (HOA) space, eliminating a potential safe and scenic route for non-vehicular travel. Commenters also questioned whether the proposed project adequately incorporated traffic calming measures or other Transportation Demand Management (TDM) strategies to mitigate increased vehicle trips. Overall, the comments emphasized the need for updated traffic analysis, stronger pedestrian safety planning, and preservation of public trail access to ensure the proposed project does not negatively impact the surrounding transportation network.

### *Response*

*Traffic Volumes, Congestion, and Safety*

The comments do not demonstrate a significant traffic or safety impact or provide substantial evidence based on facts of a potential hazard to children. The proposed project's Traffic Impact Study (TIS) and subsequent VMT Addendum evaluated both existing and future (2040) conditions at key intersections near the project site, including State Route (SR) 29/Wine Country Avenue and Jefferson Street/El Centro Avenue. The analysis found that, with the addition of project-generated traffic, all studied intersections would continue to operate at acceptable levels of service (Level of Service [LOS] C or better), which is above the City's adopted standard of LOS D. The study utilized a conservative approach, using trip generation rates that likely overestimate actual traffic, and accounted for peak school commute periods. The TIS also included review of collision histories, which identified no evidence of existing safety issues at the studied intersections. While an increase in traffic volumes is expected, the projected volumes remain within the normal parameters for a city street and are not anticipated to create dangerous conditions for children walking or biking to Willow Elementary School. Additionally, the proposed project includes several design features that would enhance safety for bicyclists, pedestrians, and children:

- Sidewalks would be constructed on both sides of Clementina Circle and along the project site's frontage on El Centro Avenue, improving pedestrian access and connectivity.

- Street improvements along El Centro Avenue include widening the roadway and installing a separate sidewalk, which would enhance pedestrian safety and visibility.
- Traffic calming measures and adequate setbacks for driveways and garages are incorporated to reduce vehicle-pedestrian conflicts.
- Lighting and landscaping would be installed in accordance with City standards to ensure visibility and safe passage.
- Emergency response vehicles can claim the right-of-way by using their lights and sirens, so in the unlikely event that there is an emergency during the short period when school traffic is at its peak, responders can still get through.

Furthermore, the proposed project would not include any design elements that introduce a hazard as adequate sight lines would be provided at the access points, left-turn lanes would not be warranted at either project intersection, and no safety concerns were identified through the review of the collision histories for the study intersections.

While there is no requirement to conduct any specific Safe Routes to School analysis, the proposed project supports the goals of the Safe Routes to School program by improving infrastructure that facilitates safe walking and biking to nearby schools, including Willow Elementary School. Specifically, the proposed project includes Class III bike lane markings along El Centro Avenue between Byway East and Jefferson Street, enhancing bicycle access, and an easement and payment of required fair-share costs for a new multiuse trail along the southern side of Salvador Channel, replacing an informal path and connecting to a future Class I trail planned between Jefferson Street and SR-29. These improvements promote active transportation and provide safe, accessible routes for students traveling to and from school.

Therefore, the proposed project's circulation and access improvements are consistent with the Safe Routes to School objectives.

*Adequacy and Currency of the Traffic Study*

Some commenters noted that the TIS was prepared in 2019 and expressed concern that it may not reflect current conditions or recent regulatory changes (e.g., Senate Bill [SB] 743 VMT thresholds). CEQA does not require the most recent data if the existing analysis remains valid and supported by substantial evidence. Courts have upheld the use of prior studies where conditions have not materially changed (see e.g., *Citizens for Responsible Equitable Environmental Development (CREED) v. City of San Diego* (2011) 196 Cal.App.4th 515). The 2019 TIS includes conservative assumptions and accounts for cumulative growth projections, ensuring that the analysis remains robust.

The Consistency Checklist's analysis addresses this concern by including a 2020 VMT Addendum, which specifically evaluates the proposed project under the latest CEQA requirements for VMT. The project site is located in a Traffic Analysis Zone (TAZ) with per capita VMT well below the countywide average, and the analysis concludes that the proposed project's VMT impact would be less than significant. The TIS also evaluated a future scenario (2040) to ensure that findings remain valid over

time. While the study predates the COVID-19 pandemic, the fundamental factors affecting intersection operations and safety (such as roadway geometry, sight distance, and long-term growth projections) remain unchanged. The City and its consultants have confirmed that the methodologies and conclusions of the TIS and VMT Addendum remain appropriate and adequate for CEQA review.

*Pedestrian, Bicycle, and School Access*

The proposed project includes improvements to pedestrian infrastructure, such as a new separated sidewalk along El Centro Avenue and internal sidewalks on both sides of Clementina Circle. These enhancements would improve access and safety for pedestrians, including students walking to Willow Elementary School. The City's Bicycle Plan identifies El Centro Avenue as a planned Class III bike route, and the proposed project would implement appropriate markings as a condition of approval. While some commenters requested a dedicated bike lane, the City's adopted plans do not call for a Class II facility on this segment. The proposed project's frontage improvements and widened roadway would improve conditions for cyclists and are consistent with City policy. The proposed project also preserves and enhances connections to future planned trails, including providing an easement for a Class I trail along Salvador Channel.

*Parking, Emergency Access, and Traffic Calming*

The proposed project provides parking in accordance with City requirements, and CEQA limits the extent to which parking can be regulated as a CEQA impact. *(Save Our Access–San Gabriel Mountains v. Watershed Conserv. Auth.* (2021) 68 CA5th 8, 27 fn.10 (citing *San Franciscans Upholding the Downtown Plan v. City & County of San Francisco* (2002) 102 CA4th 656, 697 "In sum, nothing in the CEQA statute, or cases interpreting that statute, require an analysis of parking demand. Further, parking supply is not a reasonable proxy for direct physical impacts associated with a project because parking supply may in some circumstances adversely affect air quality and traffic while in other circumstances, it may create air quality and traffic benefits.") Emergency access has been reviewed and approved by the City's fire and police departments, and the project design includes two access points and adequate street width to accommodate emergency vehicles, even during peak school traffic periods. Some commenters requested the installation of stop signs on El Centro Avenue at Via La Paz and at the west end of Clementina Circle to slow traffic. Stop signs are intended to control right-of-way at intersections, not to serve as speed control devices, and their installation should be based on conflicting traffic volumes and the safety record at the location. The proposed project's traffic analysis did not identify a need for stop signs at these locations. However, the City may choose to evaluate the need for all-way stop controls in the future if warranted by changes in traffic patterns or safety concerns in the future.

## Conclusion

In summary, the transportation and traffic analysis for the proposed project demonstrates that the proposed project would not result in significant impacts related to congestion, safety, or VMT, and would improve pedestrian and bicycle infrastructure consistent with City plans. The studies and responses provided are consistent with current CEQA requirements and City policies, and the proposed project incorporates design features and measures to address the concerns raised in public comments.

# 3 - RESPONSES TO WRITTEN COMMENTS

## 3.1 - List of Authors

A list of public agencies, organizations, and individuals that provided comments on the Draft Mitigated Negative Declaration (Draft MND) is presented below. Each comment has been assigned a code. Individual comments within each communication have been numbered so comments can be cross-referenced with responses. Following this list, the text of the communication is reprinted and followed by the corresponding response.

**Author** **Author Code**

### State Agencies

California Department of Transportation ..... CALTRANS
California Department of Toxic Substances Control ..... DTSC

### Individuals

Blake Van Treese ..... B. VAN TREESE
Yvonne Baginski ..... BAGINSKI
Jodi Brownfield ..... BROWNFIELD
Oscar Calderon ..... CALDERON
Frank Coffman ..... COFFMAN
Tami Pacho Douglas ..... DOUGLAS
Lisa Eichler ..... EICHLER
Joan Foresman and Neighbors ..... FORESMAN
Barbara Bicais Foskett ..... FOSKETT
Guy and Erendira Levin ..... G. AND E. LEVIN
Genie Levin ..... G. LEVIN
Jonathan Gottlieb ..... GOTTLIEB
Steven and Lindsay Groff ..... GROFF
Jason Honsvick ..... HONSVICK
Joe Fontana ..... J. FONTANA
Carl Johnson ..... JOHNSON
Kristie Fontana ..... K. FONTANA
Katherine Van Treese ..... K. VAN TREESE
Anna Kim ..... KIM
Emily King ..... KING
Angela Kirk ..... KIRK
Flora Lichtenstein ..... LICHTENSTEIN
Erika Martinez ..... MARTINEZ
Jacqui McNeelan ..... MCNEELAN

Kate and Keith Mercier ..... MERCIER
Steve Miller ..... MILLER
Chris and Stephanie O'Brien ..... O'BRIEN
Lynn Pacho ..... PACHO
Tina Persaud ..... PERSAUD
Judy Peterson ..... PETERSON
Julie Prince ..... PRINCE
Penny Rister ..... RISTER
Sharon Rogers ..... ROGERS
Susan Rushing-Hart ..... RUSHING-HART
Lani Sambrotto ..... SAMBROTTO
Steve Shown ..... SHOWN
Annabel Slovek ..... SLOVEK
Kelly Solomon ..... SOLOMON
Deborah Staats ..... STAATS
Ryan Stewart, Lani Sambrotto, Guy Levin, Gigi Dee, William Obrana, Mariko Hachiya, and Kimberlee Botta ..... STEWART ET AL
Mike Taylor ..... TAYLOR
Rebecca Tschauder ..... TSCHAUDER
Phoebe Ullberg ..... ULLBERG
Sandy Valente ..... VALENTE
Katherine Van Treese ..... K. VAN TREESE
Susan Vaziri (First Letter) ..... VAZIRI 1
Susan Vaziri (Second Letter) ..... VAZIRI 2
Beth Wagner and Dan Williams ..... WAGNER AND WILLIAMS
Robert Walker ..... WALKER
Jennifer Wall ..... WALL
Spencer Wheat ..... WHEAT

# 3.2 - Responses to Comments

## 3.2.1 - Introduction

Although a Lead Agency is not required to provide written responses to comments on proposed Negative Declarations (NDs) or Mitigated Negative Declarations (MNDs) under the California Environmental Quality Act (CEQA), the City of Napa (City) has evaluated the comments received on the proposed Zinfandel Subdivision Project (State Clearinghouse No. 2025080319) (proposed project) Draft MND and has elected to provide responses to the following significant environmental

comments. None of the comments received results in the need to recirculate the Draft MND or to prepare an Environmental Impact Report (EIR).

## 3.2.2 - Comment Letters and Responses

The comment letters reproduced in the following pages follow the same organization as used in the List of Authors.

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CALIFORNIA STATE TRANSPORTATION AGENCY GAVIN NEWSOM, GOVERNOR

California Department of Transportation

DISTRICT 4
OFFICE OF REGIONAL AND COMMUNITY PLANNING
P.O. BOX 23660, MS–10D | OAKLAND, CA 94623-0660
www.dot.ca.gov

September 5, 2025

SCH #: 2025080319
GTS #: 04-NAP-2025-00547
GTS ID: 37480
Co/Rt/Pm: Napa/29/14.049

Michael Allen, Acting Planning Manager
City of Napa
1600 First Street
Napa, CA 94559

**Re: Zinfandel Subdivision Project — Draft Initial Study/Mitigated Negative Declaration (IS/MND)**

Dear Michael Allen:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Zinfandel Subdivision Project. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities. The following comments are based on our review of the August 2025 Draft IS/MND.

Please note this correspondence does not indicate an official position or approval by Caltrans on this project and is for informational purposes only.

**Project Understanding**

The proposed project would remove the existing vineyards, 29 trees, a private pedestrian bridge, and the single-family dwelling and detached garage from the approximately 9.56-acre project site to develop a 51-lot subdivision containing 51 single-family homes, 12 accessory dwelling units (ADUs), and 10 junior ADUs. Proposed off-site construction includes improvements along Salvador Channel as well as the dedication of a 10-foot-wide right-of-way (ROW) along the El Centro frontage to the City with planned improvements to the pedestrian network. The project site is within a half mile of State Route (SR) 29. 1

**Travel Demand Analysis**

The project Vehicle Miles Traveled (VMT) analysis and significance determination are undertaken in a manner consistent with the City's adopted significance thresholds for VMT. Per the IS/MND, this project is found to have a less than significant VMT impact

due to project site's location within a traffic analysis zone (TAZ) that has a per capita home-based VMT that is 29 percent below the Countywide average. However, a 2020 addendum to the 2019 Traffic Impact Study (TIS) estimated that a proposal of 53 single-family homes, 12 ADUs, and 14 junior ADUs would generate 681 net new daily trips. Therefore, the current proposal of 51 single-family homes, 12 ADUs, and 10 junior ADUs can be expected to generate a similar number of net new daily trips. In addition to construction of pedestrian improvements along the project frontage at El Centro Ave and the trail along the southern border of Salvador Creek, please consider the following transportation demand management (TDM) measures to reduce project-generated vehicle trips: 1 CONT

- Provide Electric Vehicle Charging Infrastructure,
- Implement Market Price Public Parking (On-Street),
- Provide Traffic Calming Measures.

**Construction-Related Impacts**
Project work that requires movement of oversized or excessive load vehicles on State roadways requires a transportation permit that is issued by Caltrans. To apply, please visit Caltrans Transportation Permits (*link*). 2

Prior to construction, coordination may be required with Caltrans to develop a Transportation Management Plan (TMP) to reduce construction traffic impacts to the State Transportation Network (STN).

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Luana Chen, Transportation Planner, via LDR-D4@dot.ca.gov. For future early coordination opportunities or project referrals, please visit Caltrans LDR website (*link*) or contact LDR-D4@dot.ca.gov. 3

Sincerely,

YUNSHENG LUO
Branch Chief, Local Development Review
Office of Regional and Community Planning

c: State Clearinghouse

## State Agencies

### *California Department of Transportation (CALTRANS)*

*Response to CALTRANS-1*

The comment is noted. The proposed project would comply with 2022 Title 24 Building Energy Efficiency Standards and CALGreen requirements, which require electric vehicle (EV) charging infrastructure. While the City may wish to include Conditions of Approval (COAs) requesting or requiring traffic calming measures, this item is at their discretion and not required to mitigate an impact. The use of paid parking in a residential neighborhood far removed from the downtown area is typically not appropriate, so it is not recommended for this proposed project. No further response is required.

*Response to CALTRANS-2*

The comment is noted. The proposed project would comply with all applicable Caltrans requirements, including those related to transportation permits for project work that requires movement of oversized or excessive load vehicles. No further response is required.

*Response to CALTRANS-3*

The comment is noted. The proposed project would comply with all applicable Caltrans requirements, including those related to reducing construction traffic impacts to the State Transportation Network. No further response is required.

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Department of Toxic Substances Control

*Yana Garcia*
Secretary for
Environmental Protection

Katherine M. Butler, MPH, Director
8800 Cal Center Drive
Sacramento, California 95826-3200
dtsc.ca.gov

*Gavin Newsom*
Governor

**SENT VIA ELECTRONIC MAIL**

August 11, 2025

Michael Allen
Acting Planning Manager
City of Napa
1600 First Street
Napa CA 94559
mallen@cityofnapa.org

RE: MITIGATED NEGATIVE DECLARATION FOR ZINFANDEL SUBDIVISION PROJECT DATED AUGUST 7, 2025, STATE CLEARINGHOUSE NUMBER 2025080319

Dear Michael Allen,

The Department of Toxic Substances Control (DTSC) reviewed the Mitigated Negative Declaration (MND) for the Zinfandel Subdivision Project (Project). The Project applicant, Crown Realty Property Management, proposes to develop a 51-lot subdivision containing 51 single-family homes, 12 accessory dwelling units (ADUs), 10 junior ADUs, and related improvements on approximately 9.56 acres. The existing single-family dwelling, the detached garage, and the private pedestrian bridge on the project site would be demolished. Additionally, the existing vineyards on the project site would be removed, as well as 29 trees. DTSC recommends and requests consideration of the following comments: 1

1. When agricultural crops and/or land uses are proposed or rezoned for residential use, several contaminants of concern (COCs) can be present. The Lead Agency shall identify the amounts of Pesticides and Organochlorine Pesticides (OCPs) historically used on the property. If present, OCPs requiring further analysis are dichloro-diphenyl-trichloroethane, toxaphene, and dieldrin. Additionally, any level

of arsenic present would require further analysis and sampling and must meet approved local area baselines or thresholds. If they do not, remedial action must take place to mitigate them below those thresholds. Additional COCs may be found in mixing/loading/storage areas, drainage ditches, farmhouses, or any other outbuildings and should be sampled and analyzed. If smudge pots had been routinely utilized, additional sampling for Polycyclic Aromatic Hydrocarbons and/or Total Petroleum Hydrocarbons may be required. These recommendations should be adhered to and become part of the environmental document. Please refer to the DTSC's Human and Ecological Risk Office (HERO) webpage for the most recent guidance and screening levels.

1 CONT

2. If buildings or other structures are to be demolished on any Project sites included in the proposed Project, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. Removal, demolition, and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. In addition, sampling near current and/or former buildings should be conducted in accordance with DTSC's Preliminary Endangerment Assessment (PEA) Guidance Manual.

2

3. All imported soil/fill material should be tested to assess any contaminants of concern meet screening levels as outlined in DTSC's PEA Guidance Manual. Additionally, DTSC advises referencing the DTSC Information Advisory Clean Imported Fill Material Fact Sheet if importing fill is necessary. To minimize the possibility of introducing contaminated soil/fill material, there should be documentation of the origins of the soil/fill material and, if applicable, sampling be conducted to ensure that the imported soil/fill material are suitable for the intended land use. The soil sampling should include analysis based on the source of the soil/fill and knowledge of prior land use.

3

DTSC would like to thank you for the opportunity to comment on the MND for the Zinfandel Subdivision Project. Thank you for your assistance in protecting California's

people and environment from the harmful effects of toxic substances. If you have any questions or would like clarification on DTSC's comments, please respond to this letter or via our CEQA Review email for additional guidance. 3 CONT

Sincerely,

Tamara Purvis

Tamara Purvis
Associate Environmental Planner
HWMP - Permitting Division – CEQA Unit
Department of Toxic Substances Control
Tamara.Purvis@dtsc.ca.gov

cc: (via email)

Governor's Office of Land Use and Climate Innovation
State Clearinghouse
state.clearinghouse@lci.ca.gov

Laura Campion
Project Manager
FirstCarbon Solutions
lcampion@fcs-intl.com

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Dave.Kereazis@dtsc.ca.gov

Scott Wiley
Associate Governmental Program Analyst
HWMP - Permitting Division – CEQA Unit
Department of Toxic Substances Control
Scott.Wiley@dtsc.ca.gov

### *California Department of Toxic Substances Control (DTSC)*

*Response to DTSC-1*

The comment is noted. A comprehensive Phase I Environmental Site Assessment (Phase I ESA) was conducted for the project site, as documented in Appendix E of the Consistency Checklist (attached as Appendix A to the MND) and supplemented by the recent Soils and Hazardous Building Materials Investigation Report conducted pursuant to the September 11, 2025 DTSC Letter (Soils Investigation Report) prepared by CKG Environmental, Inc (Appendix B of this Final MND). The Phase I ESA included a review of historical land uses, regulatory records, and site reconnaissance, confirming that the project site was used for vineyards and limited orchard and pasture activities for several decades. Based on this history, the potential for residual pesticides, organochlorine pesticides (OCPs), and arsenic was evaluated. The Soils Investigation Report collected and analyzed multiple soil samples for OCPs (including dichloro-diphenyl-trichloroethane [DDT], toxaphene, and dieldrin) and arsenic. All detected concentrations were below residential screening levels established by DTSC's Human and Ecological Risk Office (HERO). Arsenic levels ranged from 6.65 to 14.9 milligrams per kilogram (mg/kg), which fall within Napa County's background range and cleanup goals. No evidence of smudge pot use or petroleum hydrocarbon contamination was found. Therefore, no remedial action is required, and these findings confirm compliance with DTSC guidance.

Additionally, please refer to Master Response 6, Clarifying Information on the Hazardous Materials Analysis, in Section 2, Master Responses, of this document. Master Response 6 provides clarifying information on the hazardous materials analysis for the proposed project, including a response to comments about soil contamination and the Phase I ESA's findings. No further response is required.

*Response to DTSC-2*

The comment is noted. A hazardous building materials survey was completed for the existing structures on the project site (Soils Investigation Report, Appendix B of this Final MND). The survey identified asbestos-containing materials (ACMs) in drywall joint compound and textured coatings, as well as lead-based paint (LBP) on interior and exterior surfaces. These materials would be abated by a licensed contractor in accordance with California Division of Occupational Safety and Health (Cal/OSHA) and National Emission Standards for Hazardous Air Pollutants (NESHAP) requirements prior to demolition. The survey also addressed potential mercury-containing devices and polychlorinated biphenyls (PCBs) in caulking and light ballasts; no PCB-containing caulk was detected, and fluorescent light ballasts would be managed per applicable regulations. Soil adjacent to older structures was tested for lead, and elevated lead concentrations were detected. As such, lead abatement would be required pursuant to applicable federal and State regulations, such as Cal/OSHA, the California Code of Regulations, and the United States Environmental Protection Agency (EPA). All removal, demolition, and disposal activities would comply with California environmental regulations and DTSC's Preliminary Endangerment Assessment (PEA) Guidance Manual, reducing any potential impacts to less than significant.

Additionally, please refer to Master Response 6, Clarifying Information on the Hazardous Materials Analysis, in Section 2, Master Responses, of this document. Master Response 6 provides clarifying

information on the hazardous materials analysis for the proposed project, including a response to comments about soil contamination and the Phase I ESA's findings. No further response is required.

*Response to DTSC-3*

The comment is noted. The proposed project anticipates the need to import approximately 1,700 cubic yards of soil/fill to achieve final site grades and support construction activities. In accordance with DTSC and local regulatory requirements, all imported soil and fill material would be subject to appropriate testing and documentation prior to delivery to the project site. This process would ensure that the introduction of imported material does not pose a risk to the environment and is consistent with DTSC's guidance for clean imported fill. No further response is required.

**From:** blakevantreese@gmail.com
**To:** Michael Allen
**Subject:** El Centro Development
**Date:** Thursday, August 28, 2025 9:36:14 PM

[You don't often get email from blakevantreese@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification ]

[EXTERNAL]

To Whom It May Concern,

I am a concerned citizen who would like to voice my adamant disapproval of the proposed development on El Centro avenue. I understand that this is the window for comment so I felt obliged to voice my concern.

I'm concerned for my children's safety who go to Willow. The increased traffic during drop off and pick up puts them at risk. It's already a problem and adding 50 units with ADUs is going to be a massive problem causing increased digestion, a lack of street parking and a dangerous environment for children crossing the streets.

1

I live in the neighborhood so I am hyper aware of how congested the street is in the morning and afternoon.

I know we need housing but the plan include enough parking and El Centro is going to become a parking lot and it is going to create an unsafe environment. 20 houses with 2 parking spots per unit would be something that could be tolerated, but 50 units with ADUs and one parking spot is absurd and frankly reckless.

I am also concerned about the salmon who comes spawning up El Centro Creek. I previously lived on Moss Lane for 10 years and got to see them spawning with my kids and it was magical. What is the plan for stormwater runoff and for protecting the salmon?

2

Blake Van Treese
3088 Encanto Dr

Sent from my iPhone

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## Individuals

### *Blake Van Treese (B. VAN TREESE)*

*Response to B. VAN TREESE-1*

The comment is noted. Please refer to Master Response 9, Clarifying Information on the Transportation Analysis, in Section 2, Master Responses, of this document. Master Response 9 provides clarifying information on the transportation analysis for the proposed project, including a response to comments related to safety, emergency access, traffic congestion, and the adequacy of the transportation analysis. No further response is required.

*Response to B. VAN TREESE-2*

The comment is noted. Please refer to Master Response 5, Clarifying Information on the Biological Resources Analysis, in Section 2, Master Responses, of this document. Master Response 5 provides clarifying information on the biological resources analysis for the proposed project, including a response to comments about special-status species, tree removal and mitigation, and Salvador Channel.

Please also refer to Master Response 7, Clarifying Information on the Stormwater Analysis, in Section 2, Master Responses, of this document. Master Response 7 provides clarifying information on the hydrology and water quality analysis for the proposed project, including a response to comments about potential flooding risk, stormwater runoff, and hydraulic modeling. No further comment is required.

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**From:** Yvonne Baginski
**To:** Michael Allen
**Subject:** Zinfandel Estates Concerns
**Date:** Thursday, August 28, 2025 4:02:18 PM

You don't often get email from yvonnebaginski@gmail.com. Learn why this is important

[EXTERNAL]

Good afternoon. I have a few concerns about the subdivision planned on the corner of Trower and Jefferson Sts. Please consider the following:

1. For the past 2-3 years, there has been a significant increase in the migratory movements of spawning salmon, both Coho and Chinook, in the Salvador Creek. The salmon come up from the Napa River, and continue through Vintage High School until they eventually get to Byway East. Some have made it all the way to Orchard Ave. Last year, at least 11 salmon were found spliced open for their roe on the banks of the creek. (Some were discovered behind the Napa Sign Shop on Biway East.) The Salmon migration occurs in the first rains, usually in December/January. There is no mention of the salmon in the biological report. The salmon sightings have drawn crowds on the Garfield Bridge and alongside the creek. Many people have been concerned for the well-being of the fish, and postings have been found on Next Door. This has been brought to the attention of the Napa City Council, Napa Flood Control, and Napa Resources and Conservation District. In 2025, the Sierra Club, the Institute for Conservation, Advocacy, Research and Education, the Napa Solano Audubon Society and the Golden State Salmon Association, with students from Vintage High School, created several signs for posting alongside the creek specifically to educate the public and hopefully keep them from harassing the fish. In August 2025, six signs were ultimately posted alongside the bridges spanning the creek at Vintage High School (see attached photo). Last week, the Napa County Wildlife Commission approved an $8,000 grant to build two more substantial signs on each side of the Garfield Bridge. Those signs will hopefully be posted by October. 1

This part of Salvador Creek near VHS, is a high-traffic dog-walking area, and with the inclusion of the new Vintage Farms subdivision nearby, we see more public use of the paths. Increased traffic translates to further damage to the creek with litter, riparian habitat destruction, feral cat colonies and so on. We are attempting to salvage what is possible with the posting of signs and getting more students from Vintage High School as "creek stewards."

All of this work might be in vain if less than a half a mile away, yet another subdivision is going to be added alongside the creek. This will have a significant impact on the chinook salmon migration, which has already been significantly stymied by the Vintage Farms build. Furthermorre, adding more stormwater culverts will create adversarial conditions for any gravel, sand or possibilities of eggs surviving to live births. When it rains ,the creek already overflows and floods surrounding areas from the stormwater runoff. The stream bed is already significantly damaged from the water rushes.

Just five years ago, there were small fish often active and seen in Salvador Creek. Now, we don't see them in the areas with the most public access. I suspect viability is an issue with all of the visible threats for survivorship.

But, we do see the large salmon spawners still coming through, with an optimal hope for survivorship. Maybe we can give them a chance.

The biological tree loss and the disturbance of the riparian edge for this build will definitely affect any possibility of fish in this creek.

The biological surveys were completed in August, 2019 and May 2024. The salmon runs are in Dec-Jan. This needs to be considered in the argument in favor of a complete EIR.

1 CONT

2. Lack of up-to-date, reliable data. The Biological Survey relied heavily on traditional data sources established by CDFW and USFS. Some information in these databases can be questioned and is sometimes out of date. Staff shortages have plagued these agencies for years, and much of the information now added is provided by biologists hired by developers to propel a project forward. Local environmental data available through the Napa Solano Audubon Society, the Sierra Club, the Napa County Resources and Conservation District, the Napa Flood Control, and website app ebird.org, were not included in the survey. Anyone who lives near the creek can attest that the creek does not "dry out" every year, and though it has gotten low during times of drought, there are always visible pools of water. The creek is definitely a wildlife corridor. It is also an access point for wildlife to get to for water.

2

3. Sightings of river otters are common in the creek as it meanders through Vintage High School I would assume that the river otters continue upstream as well. There is no mention of river otters in the biological report. (Of course, since this is private land, we can't poll the public on what they've seen on this creek on this particular piece of land.
Also, there are several beaver dams on this creek. Leif Bryant of Napa Flood Control is very familiar with Salvador Creek and would be a good resource for what mammals are living where, and what habitat should be protected.

3

4. The removal of 29 trees will have a significant impact on nesting birds, raptors, etc. I don't understand why calling the "nonnative" trees makes any point at all. The majority of trees in the City of Napa are non-native and that doesn't mean that the animals don't use them as habitat. Removing the trees will also take away from the creek. The fish and animals need protection from the sun. The trees/vegetation should be left alone in the setback. Removing trees should be avoided. With only a 20% survival rate, replacing trees should be done on a 1:5 ratio.

4

5. Who will have access to the walking path? Will this path be asphalt? Will it be a bike path? Will this path be available only to the people who are living in the subdivision or will there be public access? Will there be wildlife paths so that the deer, etc.,. can have access to the water? It has been brought to my attention that certain residential areas fence off the access to the creeks and the animals are having difficulties getting to the water. The residences make the creek access their "private domain."

5

6. What government agency will have conservation management authority over the creek? Will the creek be considered part of the subdivision's private land? Who will be accountable for maintaining the riparian habitat, wildlife populations etc? The City of Napa does not own this land, and the private developer will be selling off "lots" which will presumably extend to the center of the creek. How will this translate for public or wildlife access?

6

I believe that the most prudent thing to do is for the City of Napa to require an EIR for this parcel. Then, too, having local wildlife experts evaluate a "best practices" scenario for wildlife habitat protection alongside the creek. Bringing in soil, plant, stream, and wildlife experts for a complete evaluation and plan for doing this the best way possible would reflect positively on

the City.

Thank you for taking the time to read this far. I hope you'll consider moving forward with a complete EIR and bringing in feedback and support from local wildlife experts.

6
CONT

Yvonne Baginski, Founder
Napa County Wildlife Habitat Conservation Coalition
https://napaconservation.org

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***Yvonne Baginski (BAGINSKI)***

*Response to BAGINSKI-1*

The comment is noted. Please refer to Master Response 5, Clarifying Information on the Biological Resources Analysis, in Section 2, Master Responses, of this document. Master Response 5 provides clarifying information on the biological resources analysis for the proposed project, including a response to comments about special-status species, tree removal and mitigation, and Salvador Channel. No further response is required.

*Response to BAGINSKI-2*

The comment is noted. Please refer to Master Response 5, Clarifying Information on the Biological Resources Analysis, in Section 2, Master Responses, of this document. Master Response 5 provides clarifying information on the biological resources analysis for the proposed project, including a response to comments about special-status species, tree removal and mitigation, and Salvador Channel. No further response is required.

*Response to BAGINSKI-3*

Please refer to Master Response 5, Clarifying Information on the Biological Resources Analysis, in Section 2, Master Responses, of this document. Master Response 5 provides clarifying information on the biological resources analysis for the proposed project, including a response to comments about special-status species, tree removal and mitigation, and Salvador Channel. No further response is required.

*Response to BAGINSKI-4*

Please refer to Master Response 5, Clarifying Information on the Biological Resources Analysis, in Section 2, Master Responses, of this document. Master Response 5 provides clarifying information on the biological resources analysis for the proposed project, including a response to comments about special-status species, tree removal and mitigation, and Salvador Channel. No further response is required.

*Response to BAGINSKI-5*

The comment is noted. The project site is within the developed portion of the City and relatively significantly impacted by the existing urbanization of its surroundings. As the commenter noted, this is already an area of high use. In addition, much of the area is without an existing path, so the use is spread into the creek zone rather than limited to a dedicated path. The planned path would help focus the use onto the path and keep a larger proportion of use out of the natural areas, including the creek. The restoration of the creek and associated riparian corridor would be a net benefit for the ecology of the creek system. No further comment is required.

*Response to BAGINSKI-6*

Please refer to Master Response 5, Clarifying Information on the Biological Resources Analysis, in Section 2, Master Responses, of this document. Master Response 5 provides clarifying information on the biological resources analysis for the proposed project, including a response to comments about special-status species, tree removal and mitigation, and Salvador Channel. The City of Napa

Planning and Public Works Departments would enforce compliance with mitigation measures applicable to the proposed project with input from qualified biologists. Additionally, as explained in the Mitigation Monitoring and Reporting Program (MMRP), the California Department of Fish and Wildlife (CDFW) and Regional Water Quality Control Board (RWQCB) would have regulatory oversight. No further response is required.

**From:** Jodi Brownfield
**To:** mallen@cityofnapa.org
**Subject:** Zinfandel subdivision
**Date:** Sunday, August 24, 2025 5:35:07 PM

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[You don't often get email from jodibrownfield@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification ]

[EXTERNAL]

NO! We know this will have dire environmental impact. NO! 1

Sent from my iPhone

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***Jodi Brownfield (BROWNFIELD)***

*Response to BROWNFIELD-1*

The comment is noted. Please refer to Master Response 3, General Opposition Comments Not Addressed in the Final MND, in Section 2, Master Responses, of this document. Master Response 3 provides a response to comments that express general opposition or disapproval of the proposed project. No further response is required.

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**Laura Campion**

**Subject:** FW: El Centro Ave

-----Original Message-----
From: oscar calderon <ocalderon76@yahoo.com>
Sent: Tuesday, August 26, 2025 7:12 AM
To: mallen@cityofnapa.org
Subject: El Centro Ave

[You don't often get email from ocalderon76@yahoo.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification ]

[EXTERNAL]

Hello, my name is Oscar. I have been living in the El Centro area for over 20 years. Having the vineyards there has been amazing to see. I understand that Napa needs more homes. But adding 51 homes would add more traffic to an already busy area. The one thing I would like to ask has the city though about maybe adding a park in that area? Hope you see this email thank you! 1 2

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***Oscar Calderon (CALDERON)***

*Response to CALDERON-1*

The comment is noted. Please refer to Master Response 3, General Opposition Comments Not Addressed in the Final MND, in Section 2, Master Responses, of this document. Master Response 3 provides a response to comments that express general opposition or disapproval of the proposed project. No further response is required.

*Response to CALDERON-2*

The comment is noted. The project site has a land use designation of Single-Family Residential (SFR-20) in the operative 2020 General Plan and is zoned Single-Family Residential with a minimum lot size of 4,000 square feet (RS 4). As such, the project site has been planned for residential uses since 1996. Therefore, no alternative uses for the project site, such as a park, were considered as part of the CEQA evaluation. No further response is required.

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**Laura Campion**

**Subject:** FW: Zinfandel Subdivision Comments re Draft Mitigated Negative Declaration

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**From:** Frank C <cfman.npa@gmail.com>
**Sent:** Wednesday, August 27, 2025 12:51 PM
**To:** Michael Allen <mallen@cityofnapa.org>
**Cc:** fcoffma@att.net <fcoffma@att.net>
**Subject:** Zinfandel Subdivision Comments re Draft Mitigated Negative Declaration

You don't often get email from cfman.npa@gmail.com. Learn why this is important

[EXTERNAL]

08/27/2025

To: City of Napa Community Development Department

1600 First Street

Napa, California 94559

Attn: Michael Allen, Acting Planning Manager

Re: Zinfandel Subdivision Project – Comments Draft Mitigated Negative Declaration

Dear Mr. Allen,

Thank you for the opportunity to comment on the proposed Zinfandel Subdivision Project.

My wife Laura and I have lived at 124 Moss Lane for the past 25 years and we are both native Napans. While we are not opposed to the project, I do have some questions and concerns after reviewing the documents and associated appendices that were available to view online. My concerns and questions pertain to the Hydrology report and traffic study.

As you likely know, the biggest concern for the surrounding neighborhoods is the potential for flooding due to the location of Salvador Channel. My questions and suggestions are:

1

1) In section VI: page 10-11 “Storm Water Facility Maintenance” RSA Engineering stresses the need for the drainage and bio retention ponds to be maintained. While the report vaguely indicates who would be responsible once the properties are sold, is it each individual homeowner or the HOA that is supposed to be formed that will be responsible for the maintenance of the systems?

Also, who will be responsible for ensuring that these important systems continue to actually be maintained, The City or County or other?

My concern here is that while the drainage design seems to have offset the reduction in stormwater runoff, a key in minimizing any potential for future flooding would be the maintenance of the proposed systems. In my view it is really important for this to happen on a regular basis, especially in the bio retention ponds and terraced areas of the project. 1 CONT

I know this is probably not possible, but I will ask anyway. Did anyone look at what would happen if Lots #50 and #51 were omitted and that area was terraced even further to help potential flooding in the adjacent neighborhoods? 2

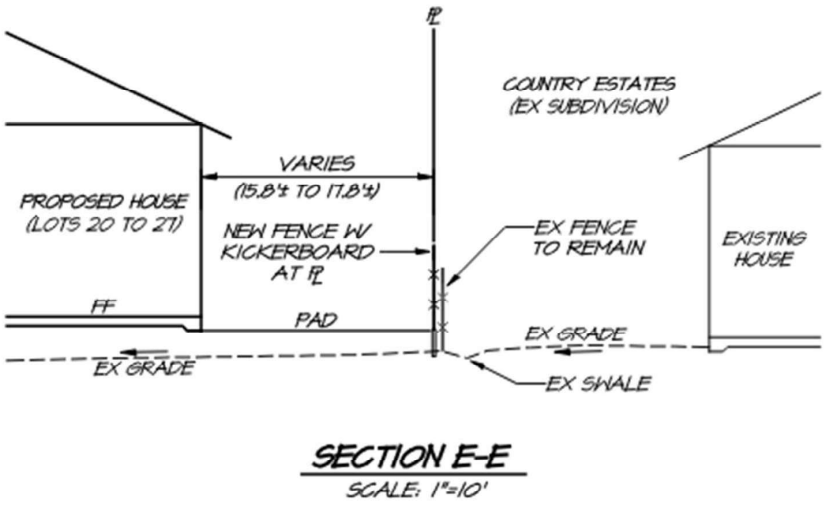
2) In section III.A, page 3 of 11 #4 says "Impervious areas will be minimized to the maximum extent practicable".

My question is: Do the Hydrology report runoff calculations factor in potential areas that would be covered with cement after each home is sold? For example, sidewalks going into their backyards as well as cement in most of the rear yards or other features that would reduce ground saturation in the proposed subdivision. The tentative subdivision map and the landscape plans do not show any walkways and only show a very small rear patio area. If this was not factored in the hydrology calculations wouldn't increase storm water runoff in the proposed subdivision? If so, is there ample offset for this scenario? 3

3) On the Tentative Subdivision Map TM4, the finished grade elevation of the rear yards on lots #20 to #27 are higher than the existing grade of the lots that butt up to those on Moss Lane. I understand that this is commonly done and that the grading shows the drainage running towards Clementia Circle and Salvador Channel. However, on TM6, cross section DD and EE show the proposed detail as having only a kicker board at the bottom of the fence and the rear yard "pad" is quite a bit higher than the elevation of the rear yards on Moss Ln (See detail from TM4 Below).

My question is what happens to the storm runoff if the homeowner installs a cement patio and slopes it towards the houses on Moss Lane? Wouldn't this create a problem in the backyards of the homes located on Moss Lane? The plan does show an existing swale in the backyards of the Moss Lane homes but to my knowledge these no longer exist due to the Moss Lane homeowners landscaping their backyards and burying the swale. Did anyone verify that the swale on the Moss Lane properties actually exists? 4

It seems like a better solution might be to install a short retaining wall where the top of the wall sits above the rear yard finished grade (pad) for lots #20 - #27. In my view it would ensure the redirection of storm runoff in the rear yards of those lots towards Clementia Circle and not create potential ponding or flooding issues for the homeowners on Moss Lane (Country Estates).




SECTION E-E
SCALE: 1"=10'

4 CONT

4) Traffic Study:

The provided traffic study is dated August 1, 2019, and is 6 years old and likely no longer current.

The Highway Capacities Manual used to collect the data was from 2000 and 2010. It was updated to the 7th edition in 2022. Surely the data has changed.

The California Highway Patrol Statewide Integrated Traffic System data used in the traffic study was from January 1, 2012, through December 31, 2016, and may no longer be current in that it is updated every 5 years. 5

In my view the traffic study should be updated to reflect the most current data available.

My questions for the existing traffic report are: Did anyone ask for a new report or at least check the report against any new data available to make sure that the data in the existing report is still relevant and current? Did the traffic report factor in the increased traffic that occurs during school hours? Yountville school closed and from what I understand the students were incorporated in El Centro School.

5) My concern for the neighborhood and traffic problems is that the El Centro and surrounding streets are highly congested, especially during school drop off and pick up times (as with many other schools in Napa). However, there are 3 schools that add to the congestion, which in my view is unique to the neighborhood. El Centro School, Vintage High School and Salvador School. We also have many neighbors leaving for work at the same time (as with other school areas).

The traffic congestion choke points during these times realistically are: El Centro at Jefferson, Bi Way East at Highway 29, Cask Way at Trower, Trower at Highway 29, Jefferson at El Centro east, Jefferson at Trower, Jefferson at Salvador and Salvador at Highway 29. 6

In my view, during school drop off and pick up times I am relatively certain that any emergency vehicle would not be able to quickly get through the El Centro school area due to the number of vehicles waiting on El Centro Avenue to drive into the school parking lot to drop off or pick up their children. Many vehicles literally wait in the street and block passage through El Centro. While this does not last all day it is a cause for concern if there is

an emergency. Has anyone from the City of Napa physically looked at this issue during school drop of and pick up hours?

6 CONT

A few years ago, someone was hit while crossing the street in front of El Centro School. Since then, a flashing light system has been installed. My concern is oftentimes drivers will speed down El Centro coming from Bi Way East. Would it be possible to install a stop sign on El Centro Avenue at La Paz and the west entrance to Clementia Circle? It seems like this would at least slow drivers down as they approach El Centro School. It would essentially make this a 4 way stop.

7

Thank you for the opportunity to share my views and ask questions about the proposed project. My apologies if I misunderstood something in the reports provided. I am by no means an expert on any of the points I have brought up.

Lastly, my intent is to try and have the best possible outcome for everyone concerned, not just the developer.

Thank you for your time

Sincerely,

Frank Coffman

124 Moss Lane, Napa, Ca.

Cell: (707) 337-3015

E-mail: cfman.npa@gmail.com

***Frank Coffman (COFFMAN)***

*Response to COFFMAN-1*

The comment is noted. As detailed in the Stormwater Control Plan in Appendix F.1 of the Consistency Checklist, maintenance of stormwater facilities would be the responsibility of the property owner and would be performed by the owner's contractors or employees as part of routine maintenance of buildings, grounds, and landscaping. Additionally, the applicant would review the Post-construction Best Management Practices (BMP) Maintenance Agreement with the City regarding the maintenance of the stormwater facilities and commit to execute any necessary agreements prior to completion of construction. The applicant would accept responsibility for interim operation and maintenance of stormwater treatment and flow-control facilities until such time as this responsibility is formally transferred to a subsequent owner. Ongoing maintenance of stormwater facilities would be required and enforced through an Operations and Maintenance Plan and agreement with the City. No further response is required.

*Response to COFFMAN-2*

The comment is noted. Please refer to Master Response 7, Clarifying Information on the Stormwater Analysis, in Section 2, Master Responses, of this document. Master Response 7 provides clarifying information on the hydrology and water quality analysis for the proposed project, including a response to comments about potential flooding risk, stormwater runoff, and hydraulic modeling.

As detailed in Master Response 7 and the Consistency Checklist, the proposed stormwater improvements included as part of the proposed project would be sufficient to address the potential for flooding and ensure that homes and structures would be protected. Potential impacts are reduced to below a level of significance. The Stormwater Control Plan (Appendix F of the Consistency Checklist) includes flood management design features included as part of the proposed project to reduce the potential flood hazard, such as use of permeable pavers, dispersal of runoff to pervious areas, and use of bioretention facilities. The Hydraulic Analysis (Appendix F of the Consistency Checklist) prepared for the proposed project concluded that these design features would successfully reduce potential flood risks at the project site. These design features involve elevating portions of the project site above the 100-year flood elevation. The addition of bioretention areas at the project site is also included as part of the proposed project to ensure that the proposed post-development flow discharge from the project site would not exceed pre-developed levels. The addition of these proposed project design features would reduce the amount of surface runoff from the project site and, therefore, reduce the risk of flooding as a result of the proposed project. The impacts related to flooding would be less than significant. As such, no alternatives were considered to reduce potential impacts related to flooding risk. No further response is required.

*Response to COFFMAN-3*

The comment is noted. The hydrology and stormwater control plans for the proposed project do incorporate conservative assumptions regarding impervious surfaces. Specifically:

- The runoff curve number (CN) calculations used in the hydrology report assume a mix of open space and impervious areas, with impervious areas (e.g., paved surfaces and roofs) assigned a CN of 98, which reflects high runoff potential.
- The weighted CN for Watershed 1 is 85 and for Watershed 2 is 84, indicating that the modeling already includes a substantial impervious footprint.
- Stormwater runoff from roof and paved areas is routed to four bioretention facilities designed per Bay Area Stormwater Management Agencies Association (BASMAA) Post-Construction Manual standards. These facilities are engineered to detain and treat runoff, including from future impervious additions, and are sized to handle the 1-year, 1-hour storm event without overflow.
- Landscaping is planned for both front and rear yards, and stormwater runoff is intentionally directed to these pervious areas to promote infiltration.

While the tentative subdivision map and landscape plans may not show every potential future walkway or patio, the hydrology calculations and stormwater infrastructure have been designed with conservative assumptions and mitigation strategies to accommodate typical residential development patterns. Therefore, even if homeowners add impervious features post-sale, the proposed project's stormwater management system is expected to provide ample offset and maintain compliance with water quality and runoff standards. No further response is required.

*Response to COFFMAN-4*

**Grading and Elevation Differences**

The Tentative Subdivision Map (TM4) and cross-sections (TM6) do show that the finished pad elevations for Lots #20–27 are higher than the existing grade of the adjacent Moss Lane properties. This elevation difference is intentional and typical in subdivision design to facilitate proper drainage away from neighboring properties.

**Stormwater Management and Drainage Design**

The proposed project incorporates a comprehensive stormwater control strategy that includes multiple bioretention facilities designed to treat and detain runoff before it is discharged. Specifically, Drainage Management Area (DMA) 1, which includes Lots #20–26 and portions of Lot #27, directs runoff via splash boxes and landscape areas to bioretention area #1, located near Clementina Circle. This facility is designed to handle runoff from these lots and functions as both a treatment and detention basin.

The bioretention facilities are constructed in accordance with BASMAA standards, including a 6-inch ponding reservoir that ensures the 1-year, 1-hour storm event does not exceed overflow elevations.

**Concerns About Homeowner Modifications**

While the project design anticipates typical residential improvements, it relies on the assumption that homeowners will comply with City regulations regarding drainage and impervious surface

management. The City's building permit process includes review of such modifications to ensure they do not adversely affect neighboring properties.

**Swale Conditions on Moss Lane Properties**

The existing swale on Moss Lane properties is acknowledged in the project documents. The proposed project's drainage design does not rely on the functionality of these swales but instead ensures that runoff from the new lots is directed toward Clementina Circle and Salvador Channel via engineered systems.

**Retaining Wall Suggestion**

The suggestion to install a short retaining wall to further control runoff is noted. While the current design uses kicker boards at the base of fences, the engineered grading and drainage plan is intended to prevent runoff from flowing toward Moss Lane. The inclusion of retaining walls could be considered during final design or as a condition of approval if deemed necessary by the City's engineering staff. No further response is required.

*Response to COFFMAN-5*

The comment is noted. Please refer to Master Response 9, Clarifying Information on the Transportation Analysis, in Section 2, Master Responses, of this document. Master Response 9 provides clarifying information on the transportation analysis for the proposed project, including a response to comments related to safety, emergency access, traffic congestion, and the adequacy of the transportation analysis. No further response is required.

*Response to COFFMAN-6*

The comment is noted. Please refer to Master Response 9, Clarifying Information on the Transportation Analysis, in Section 2, Master Responses, of this document. Master Response 9 provides clarifying information on the transportation analysis for the proposed project, including a response to comments related to safety, emergency access, traffic congestion, and the adequacy of the transportation analysis. No further response is required.

*Response to COFFMAN-7*

The comment is noted. Please refer to Master Response 9, Clarifying Information on the Transportation Analysis, in Section 2, Master Responses, of this document. Master Response 9 provides clarifying information on the transportation analysis for the proposed project, including a response to comments related to safety, emergency access, traffic congestion, and the adequacy of the transportation analysis. No further response is required.

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**From:** Tami Pacho
**To:** mallen@cityofnapa.org
**Subject:** Zinfandel Subdivision Project - support
**Date:** Friday, September 5, 2025 5:45:03 PM

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[You don't often get email from tami.pacho@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification ]

[EXTERNAL]

Good evening

I am writing this for my support of the Zinfandel Subdivision project. As a Napa resident of 10 years who understands how hard it is to find housing, this project is essential to helping solve the housing crisis in our area. Additionally, as someone who does recruiting for a living, I can tell you the greatest struggle we have with attracting people to come work in Napa is the lack of housing.

1

Please approve this project.

Thank you

Tami Pacho Douglas
Sent from my iPhone

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***Tami Douglas (DOUGLAS)***

*Response to DOUGLAS-1*

The comment is noted. Please refer to Master Response 1, Support for the Proposed Project, in Section 2, Master Responses, of this document. No further response is required.

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September 4, 2025

City of Napa Community Development Department
1600 First Street
Napa, California 94559
Attn: Michael Allen, Acting Planning Manager

Subject: Draft Mitigated Negative Declaration, Zinfandel Subdivision Project (PL19-0016)

Dear Mr. Allen,

I am submitting my letter during the public comment period to express opposition to the Draft Mitigated Negative Declaration (MND) in it's form for the proposed Zinfandel Subdivision project. I am a third generation Napa resident who lives directly behind Salvador Channel and the proposed Zinfandel subdivision site (1906 Valencia Street). Overall the project raises serious concerns for our neighborhood and sustaining Napa's quality of life.

## Salvador Channel Wildlife and Creek Habitat

Salvador Channel is one of the last remaining riparian corridors in this part of Napa. It provides habitat for turtles, birds, bats, and other wildlife, and serves as a natural movement corridor. Cutting terraces, vineyard chemical runoff during construction and paving a new 12-foot walkway along the creek will permanently damage this sensitive habitat and harm wildlife.

The Draft MND acknowledges that the creek supports riparian woodland, seasonal marsh, and aquatic habitat used by special-status species such as the northwestern pond turtle, nesting birds, and bats. However, the analysis and mitigation measures are inadequate for the following reasons:

- **Outdated and limited biological surveys –** The primary biological assessment was prepared in 2019, with revisions in 2024. These surveys may not reflect current site conditions or the full range of species using the creek. CEQA requires consideration of **existing environmental conditions at the time of project approval**.
- **Inadequate mitigation –** The Draft MND proposes vague measures such as "coordinate with CDFW" or "obtain permits" (MM BIO-2). These are **deferred actions**, not enforceable mitigation. CEQA Guidelines §15126.4 requires mitigation measures to be **specific, feasible, and enforceable** at the time of project approval.
- **Wildlife movement corridor impacts –** Salvador Channel is one of the few remaining riparian corridors and wildlife breeding grounds in the area. CEQA requires analysis of whether a project would **impede the use of wildlife movement corridors** (§15065(a)(1)). The Draft MND minimizes this impact despite acknowledging the channel's role as a movement corridor.
- **Impede the use of wildlife movement corridors** (§15065(a)(1)). Draft MND minimizes this impact despite acknowledging the channel's role as a movement corridor.
- **Inadequate analysis of existing species and breeding grounds -** current photographic proof of diverse wildlife including but not limited to beavers, river otters, mink, great blue herons, egrets, chinook salmon, hawks, kingfishers, indigenous frogs, migratory ducks, hooded mergansers and common mergansers are not specifically analyzed.

1

- **Failure to fully analyze cumulative impacts –** The project would terrace the creek bank, construct outfalls, remove trees, and introduce long-term human activity along the channel (e.g., walking trail). These actions, combined with existing urbanization, create cumulative impacts to riparian habitat and wildlife movement. The Draft MND does not provide adequate analysis under CEQA Guidelines §15065(a). 1 CONT

## Flooding Risks

Flooding is an ongoing issue on Lassen and Valencia Streets for decades. The City has not mitigated the current flooding problems making flooding a deep concern. The Draft MND fails to adequately analyze **flooding risks** associated with the project. Approximately half of the project site lies within FEMA Zone AE (100-year floodplain), yet the Draft MND does not demonstrate whether finished floor elevations, driveways, or the proposed **12-foot paved pedestrian path** will be constructed above the base flood elevation (BFE). Nor does it analyze whether the proposed terracing and grading within Salvador Channel will reduce floodplain storage or alter flood flows.

CEQA Guidelines §15065(a)(4) require an EIR if a project may cause a significant hazard to the public through flooding. Here, substantial evidence shows that the proposed subdivision may: 2

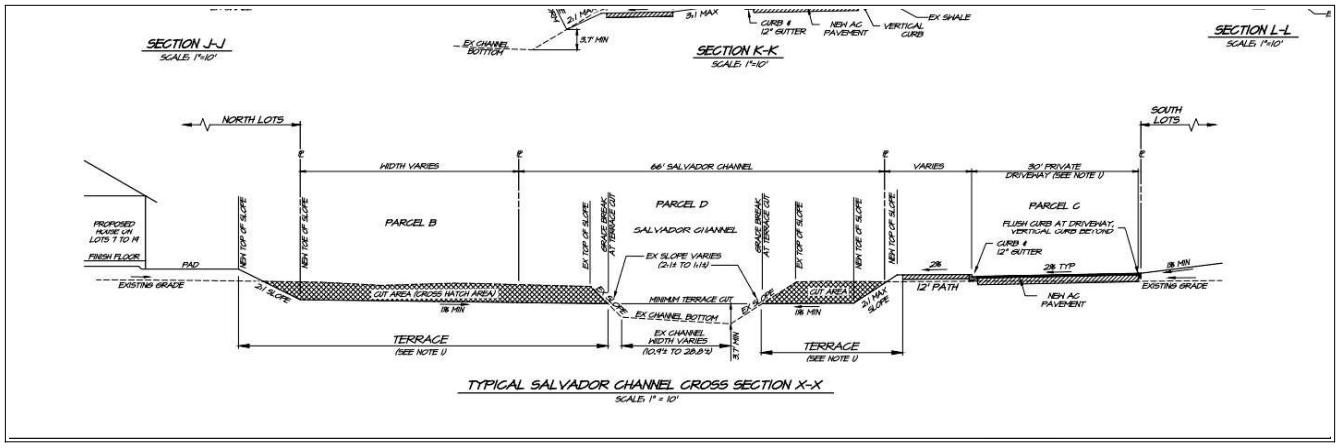
- Increase flood hazards to future residents by placing homes and infrastructure in FEMA Zone AE.
- Reduce channel capacity and natural floodplain storage by grading terraces and constructing paved features within the riparian corridor.
- Increase long-term flood risk under climate change scenarios not addressed in the Draft MND.

These impacts cannot be dismissed as less than significant.

## Walkway Impact

The proposed construction of a **12-foot paved pedestrian walkway** along Salvador Channel will have **permanent impacts to riparian habitat** and increase human disturbance within this sensitive wildlife corridor. Unlike the existing informal dirt path, the introduction of paving will add impervious surface, altering hydrology and increasing polluted runoff directly into the channel. It will also require permanent vegetation removal within the riparian zone, thereby reducing available habitat and cover for special-status species. 3

The project plans clearly show that construction of terraces in the Grading Section plans and a **12-foot paved path** will occur within the riparian corridor of Salvador Channel. This represents a **permanent encroachment into sensitive riparian habitat** and introduces impervious surface directly adjacent to the creek. These impacts were not adequately disclosed or analyzed in the Draft MND.




**Grading Sections – Exhibit TM6**

In addition, CEQA Guidelines §15065(a)(1) requires agencies to treat interference with **wildlife movement corridors** as a potentially significant impact. The Draft MND acknowledges Salvador Channel as a movement corridor, yet does not adequately evaluate how the walkway will increase human activity and fragment the riparian habitat.

- **Encroachment into Riparian Corridor**
  The terraces and 12' path are within the top of bank area, meaning there will be **permanent disturbance to riparian vegetation**.
- **Increased Impervious Surface**
  The **12' asphalt path** + new driveway introduces more runoff directly adjacent to Salvador Channel. Draft MND does not appear to quantify or analyze this impervious surface impact on hydrology and water quality. 4
- **Wildlife Movement Impacts**
  The path increases human traffic along the creek (dogs, noise, lighting), disrupting species that use Salvador Channel as a **wildlife corridor** (turtles, amphibians, birds, bats).
- **Deferred Mitigation**
  The plan shows clear construction within riparian areas, but the Draft MND relies only on "coordination with CDFW" rather than enforceable **avoidance buffers** or **habitat restoration plans**.
- **Design Alternatives Not Considered**
  A **natural-surface trail** outside the riparian setback could avoid these impacts. CEQA requires feasible alternatives to be considered before approving a project with environmental damage.

The proposed mitigation (MM BIO-2) is insufficient, as it relies on vague "coordination" with resource agencies rather than enforceable protections. At a minimum, the City must require:

- **no-paving alternative** (maintaining a natural-surface trail).
- **minimum 50-foot riparian buffer** from the top of bank.
- **Runoff treatment measures** for all trail drainage to prevent flooding

## Tree Removal Impact

The Draft MND contains **inconsistent and incomplete information** regarding tree removal. In Section 1.4.1 of the Project Description, the document states that **29 trees** will be removed. However, the Arborist Report and 5

Biological Resources section present different figures and do not clearly identify which trees are proposed for removal or retention.

- The Arborist Report identifies a **small grove of trees (Nos. 2–10)** near the channel bank that are not proposed for removal.
- The same report identifies **ornamental trees clustered near the existing residence (Nos. 11–18)** that are proposed for removal.
- The document also references **two "protected native trees"** (valley oak and coast live oak), but does not clarify whether they will be retained or removed.

This creates a direct conflict between the stated removal of 29 trees and the specific tree inventory described in the technical studies. The inconsistency prevents the public and decision-makers from understanding the true scope of tree impacts. 5 CONT

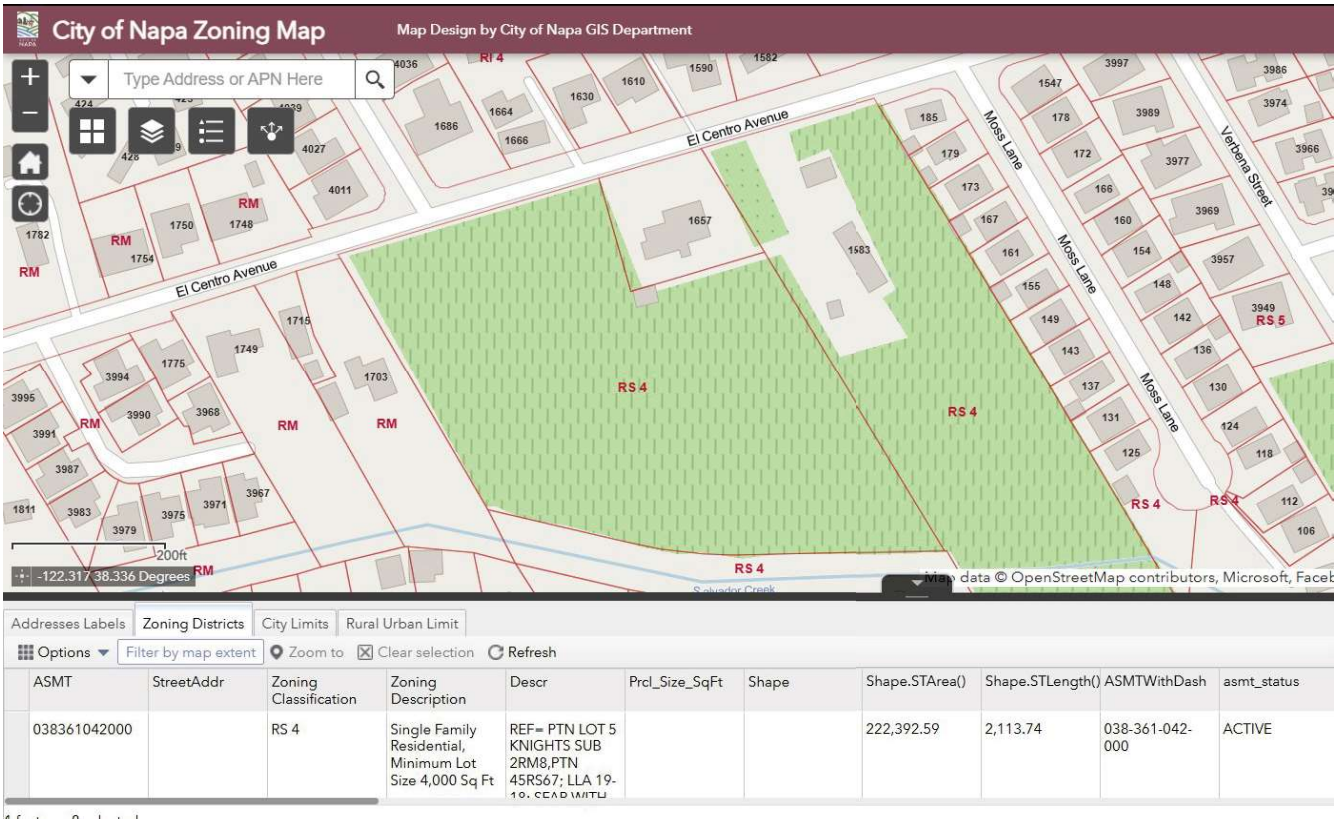
Additionally, the Draft MND does not provide adequate detail regarding:

1. The **species, size, and protection status** of all trees to be removed.
2. The **number and location of protected native trees** under Napa Municipal Code Chapter 12.45.
3. The **mitigation standards** for tree replacement, including replacement ratios (e.g., 3:1 for oaks), minimum planting sizes, maintenance requirements, and monitoring.

Without disclosure of these key details and adoption of **specific, enforceable mitigation measures** as required by CEQA Guidelines §15126.4, the Draft MND conclusion that tree impacts are less than significant is unsupported. Loss of mature native oaks and other riparian trees constitutes a **potentially significant impact** that requires preparation of a full **Environmental Impact Report (EIR)** or substantial revision of the Draft MND with clear and binding mitigation.

## Zoning Discrepancies

The project proposes several undersized lots that do not meet Napa's zoning requirements. The environmental report also mixes references to the old and new General Plans, making it unclear which standards apply. And there are references in project plan submitted by applicant Randy Gularte stating property is zone is RI-4 whereas the City of Napa Zoning Map lists proposed site as RS-4 (see below). This confusion makes it hard for the public to understand what rules are being followed. 6




| ASMT | StreetAddr | Zoning Classification | Zoning Description | Descr | Prcl_Size_SqFt | Shape | Shape.STArea() | Shape.STLength() | ASMTWithDash | asmt_status |
|---|---|---|---|---|---|---|---|---|---|---|
| 038361042000 | | RS 4 | Single Family Residential, Minimum Lot Size 4,000 Sq Ft | REF= PTN LOT 5 KNIGHTS SUB 2RM8,PTN 45RS67; LLA 19- | | | 222,392.59 | 2,113.74 | 038-361-042-000 | ACTIVE |

6
CONT

## Conclusion

For these reasons, I strongly oppose adoption of the Draft Mitigated Negative Declaration. The project will cause long-term harm to our creek, wildlife, and quality of life. I urge the City of Napa to require a full **Environmental Impact Report (EIR)** so that flooding, habitat, tree loss, and zoning concerns can be properly studied and addressed.

Sincerely,

*Lisa Eichler*

Lisa Eichler
1906 Valencia Street
(916) 616-7282
lisa_eichler@comcast.net

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***Lisa Eichler (EICHLER)***

*Response to EICHLER-1*

The comment is noted. Please refer to Master Response 5, Clarifying Information on the Biological Resources Analysis, in Section 2, Master Responses, of this document. Master Response 5 provides clarifying information on the biological resources analysis for the proposed project, including a response to comments about special-status species, tree removal and mitigation, and Salvador Channel.

Mitigation measures provided in the MND detail species-specific surveys, best construction practices, and buffer zone and monitoring implementation, as well as a restoration plan for the creek. These are not deferred actions but specific, feasible, and enforceable. Some measures require coordination and approval through State agency staff, including the CDFW and RWQCB, in addition to what are proposed as minimum requirements necessary to offset potential impacts. Coordination and obtaining approval with resource agencies such as the CDFW and RWQCB are industry standard and required for any project of this nature. No further response is required.

*Response to EICHLER-2*

The comment is noted. Please refer to Master Response 7, Clarifying Information on the Stormwater Analysis, in Section 2, Master Responses, of this document. Master Response 7 provides clarifying information on the hydrology and water quality analysis for the proposed project, including a response to comments about potential flooding risk, stormwater runoff, and hydraulic modeling. No further response is required.

*Response to EICHLER-3*

The comment is noted. Please refer to Master Response 5, Clarifying Information on the Biological Resources Analysis, in Section 2, Master Responses, of this document. Master Response 5 provides clarifying information on the biological resources analysis for the proposed project, including a response to comments about special-status species, tree removal and mitigation, and Salvador Channel. No further response is required.

*Response to EICHLER-4*

The comment is noted. Please refer to Master Response 5, Clarifying Information on the Biological Resources Analysis, in Section 2, Master Responses, of this document. Master Response 5 provides clarifying information on the biological resources analysis for the proposed project, including a response to comments about special-status species, tree removal and mitigation, and Salvador Channel.

Please refer to Master Response 7, Clarifying Information on the Stormwater Analysis, in Section 2, Master Responses, of this document. Master Response 7 provides clarifying information on the hydrology and water quality analysis for the proposed project, including a response to comments about potential flooding risk, stormwater runoff, and hydraulic modeling.

Mitigation measures provided in the MND detail species-specific surveys, best construction practices, and buffer zone and monitoring implementation, as well as a restoration plan for the creek. These are

not deferred actions but specific, feasible, and enforceable. Some measures require coordination and approval through State agency staff, including the CDFW and RWQCB, in addition to what are proposed as minimum requirements necessary to offset potential impacts. Coordination and obtaining approval with resource agencies such as the CDFW and RWQCB are industry standard and required for any project of this nature.

The proposed project relies on an MND supported by a Consistency Checklist. Under CEQA Guidelines Section 15183, if a project is consistent with the development density established by existing zoning or a general plan for which an EIR was certified, then environmental review is limited to effects that are:

- Peculiar to the project or parcel,
- Not previously analyzed as significant,
- Newly significant due to new information,
- Or more severe than previously disclosed.

The Consistency Checklist confirms that the proposed project does not result in new or more severe impacts than those identified in the 2020 General Plan Final EIR. The proposed project would result in less than significant impacts related to flooding, tree loss, and wildlife with the incorporation of mitigation as discussed in the MND and associated Consistency Checklist.

While a full EIR typically includes a broader alternatives analysis, the use of an MND under CEQA Guidelines Section 15183 is legally appropriate here. The proposed project's consistency with zoning and the prior 2020 General Plan Final EIR, along with the implementation of mitigation measures, supports the conclusion that an EIR is not required. No further response is required.

*Response to EICHLER-5*

The comment is noted. Please refer to Master Response 5, Clarifying Information on the Biological Resources Analysis, in Section 2, Master Responses, of this document. Master Response 5 provides clarifying information on the biological resources analysis for the proposed project, including a response to comments about special-status species, tree removal and mitigation, and Salvador Channel.

Additionally, please refer to Chapter 4, Errata, of this Final MND for clarification regarding the number and location of trees being proposed for removal by the proposed project. 42 trees are being proposed for removal, and as detailed in Master Response 5, the mitigation measures circulated for public review and included in the MND would fully reduce potential impacts to less than significant levels. No mitigation measures or project revisions must be added to reduce the potential impact to insignificance (see also Appendix A of this Final MND). Therefore, although the number of trees proposed for removal has been corrected and more trees would be removed than previously identified, the MND does not require any substantial revisions, and, therefore, recirculation would not be required pursuant to CEQA Guidelines Section 15073.5. No further response is required.

*Response to EICHLER-6*

The comment is noted. As discussed in Section 1.2.3, General Plan and Zoning Designations, of the Draft MND, the project application was deemed complete by the City on July 1, 2021, prior to adoption of the 2040 General Plan. Pursuant to Government Code Section 66474.2, the application is subject to the ordinances, policies, and standards in effect when the application was deemed complete. Therefore, the Envision Napa 2020 General Plan (2020 General Plan), adopted on December 1, 1998, applies to the proposed project, and the land use designations in the City of Napa 2040 General Plan (2040 General Plan), adopted on October 18, 2022, are not applicable. Accordingly, references in the Consistency Checklist and Draft MND are to the 2020 General Plan.

The project site has a land use designation of Single-Family Residential (SFR-20) in the operative 2020 General Plan and is zoned Single-Family Residential with a minimum lot size of 4,000 square feet (RS 4). Proposed lot sizes would range from approximately 3,531 to 9,708 square feet. To meet the minimum lot size requirements of the RS 4 zone (4,000 square feet), the applicant requests approval for the use of Small Lot Development Standards for nine of 51 proposed lots. This would ensure that the proposed project would achieve the required density given the site constraints, which include the parcel shape and the need to observe required setbacks from Salvador Channel. Setbacks would be consistent with Section 17.52.110 of the City of Napa Municipal Code (Napa Municipal Code), which pertains to creek setbacks, and with Section 17.52.470, which pertains to small lots (less than 4,000 square feet in size). No further response is required.

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**From:** Joan Foresman
**To:** mallen@cityofnapa.org
**Subject:** The Salvador Creek/El Central Ave. - Zinfandel Project
**Date:** Friday, September 5, 2025 4:15:00 PM

You don't often get email from joankay.foresman@gmail.com. Learn why this is important

[EXTERNAL]

Our home was only 4 yrs old when we bought it at 1656 Bryce Court, right next to Salvador Creek in 1968. We are on the south side of the creek. And it was almost dry in the summers. And very low flowing in the winter storms.

But with the going by of time, the volume of water finally became alarming during the rainy season! And it became scary during stormy times. As there was now a **very large volume of water.** And it also gets near the top and quite fast! And has also caused lots of the bank to collapse yearly! And it kept getting deeper and wider each year. Even heavy, huge oak limbs. refrigerator… have floated down it. As did people in small boats. And the police made us once evacuate during the night! [Salvador Creek now becomes like a type of river during storms. And it has been very scary to live next too!]

So, finally, some of us contacted the government. And in essence we're told that we did not have the problem that **we were actually seeing!** And finally some agreed there was a problem. And set up monthly government meetings with RCD. And us neighbors organized and many of us attended all of them for a long time. And I've got lots of notes and spent many, many hours and days working on this project. And finally we realized, the problem was not getting solved. In essence, it seemed we were just being placated! An example, is that after many meetings, the leader even started a meeting by asking what we wanted to do about the "frogs"! You've got to be kidding! We're being threatened with flood waters and have attended many meetings and with little results!

1

Then finally the government agreed to put in rain gauges.... And started seeing the truth that we were speaking of--all this time! And slowly offered a few helps. [But it's not solved! And is still scary to live next to during storms!]

And finally the reality of what we had observed and spoke about for years, became a more alarming and recognizable issue to our Napa Government. Including the flooding of Vintage High. Even to the point where now FEMA considers it to be a 100 yr flood plain! {Remember from--"**There's no problem, <u>for years,</u> to FEMA status!**} And as a result we also had to pay out of the pocket for our own engineers. And many have had to buy FEMA Flood insurance! Even neighbors far across the street. Otherwise their mortgages will be cancelled! And I did for some years. And we are still literally scared during heavy storms—day & night!

So, as residents of this Napa government caused dilemma, many of us are standing unwaveringly against you increasing this problem anymore!

We must have like a third party, professional proof that you are not increasing **this serious problem the gov't caused.** And likewise for the other forthcoming new developments in this area of Salvador Crk on El Centro to Jefferson & Trower and south.…. And yearly, unbiased professional proof too, thru measured rain gauges, charts....

Meaning that we need absolute proof that you will not exasperate this horrible problem anymore! We pay taxes for you to protect us and not to endanger us--as you have already done for years!

The inept plans of this huge watershed area, have also unnecessarily wasted my time and energy and caused unnecessary stress for many yrs! And for neighbors too. 1 CONT

I also attended the more recent meeting of Gularte for this project. And I thought this sure does not seem like a good planning for us current residents! But sure is a jewel for the property owners, the developers, the city's coffers…. Including you now proposing up to 73 new dwellings. How can that properly be?

And why isn't your planned walking pathway on their side of the creek? Instead of on the south side, where that was not a part of our purchased parcel layout? Next to the creek was and is a flood control maintenance road. Not a path for public, potential menace. Which we have experienced already. So again, this Zinfandel Project is likely not for us already living here, taxpaying residents. 2

And your new traffic plans do not seem to be high quality for—vehicles, bicycles, walking school children and adults. And we're also very concerned about the maintenance of quality, for the wildlife!

I realize this is a heavy kind of letter. But the occasion requires it! As it's for our peace of mind, safety and value of our property and our neighborhood. And since the Napa gov't made this into a FEMA Flood Zone, there's a lot at stake! And this is only the highlights. And neighbors are willing to sue you, if you do not finally, really 'protect us and our properties'! 3

Please treat us, like you would want us to treat you! Meaning you can 'honestly' look us each in the eye and say we are treating you well! Just like we would want you to treat us and our families! That's 'Good Government--By the People and for ALL the people'!

Sincerely,
Joan Foresman & Neighbors

***Joan Foresman (FORESMAN)***

*Response to FORESMAN-1*

The comment is noted. Please refer to Master Response 7, Clarifying Information on the Stormwater Analysis, in Section 2, Master Responses, of this document. Master Response 7 provides clarifying information on the hydrology and water quality analysis for the proposed project, including a response to comments about potential flooding risk, stormwater runoff, and hydraulic modeling.

Additionally, the proposed project would include the construction of 51 single-family homes, 12 accessory dwelling units (ADUs), and 10 junior ADUs, consistent with the General Plan land use designation and zoning for the project site. No further response is required.

*Response to FORESMAN-2*

The comment is noted. Please refer to Master Response 2, Non-CEQA Issues Not Addressed in the Final MND, in Section 2, Master Responses, of this document. Master Response 2 provides additional information on the scope of CEQA and any non-CEQA issues not further discussed in the Final MND.

Please also refer to Master Response 3, General Opposition Comments Not Addressed in the Final MND, in Section 2, Master Responses, of this document. Master Response 3 provides a response to comments that express general opposition or disapproval of the proposed project. No further response is required.

*Response to FORESMAN-3*

The comment is noted. Please refer to Master Response 3, General Opposition Comments Not Addressed in the Final MND, in Section 2, Master Responses, of this document. Master Response 3 provides a response to comments that express general opposition or disapproval of the proposed project.

Additionally, please refer to Master Response 9, Clarifying Information on the Transportation Analysis, in Section 2, Master Responses, of this document. Master Response 9 provides clarifying information on the transportation analysis for the proposed project, including a response to comments related to safety, emergency access, traffic congestion, and the adequacy of the transportation analysis. No further response is required.

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**From:** Barbara Foskett
**To:** mallen@cityofnapa.org
**Subject:** PL 19-0016. Zinfandel Subdivision.
**Date:** Tuesday, September 2, 2025 1:23:17 PM

You don't often get email from barbfoskett@gmail.com. Learn why this is important

[EXTERNAL]

Dear Planning Commissioners,

I am writing in strong support of the proposed Zinfandel Subdivision (PL 19-0016), which is now in its final stage of review with the City of Napa.

As a resident of Napa, I am deeply aware of the urgent need for additional housing in our community. Families, workers, and long-time residents alike face growing challenges in finding housing that allows them to live and thrive here. This project represents an important step toward meeting that need, while maintaining the values that make Napa a special place to live. 1

I also wish to emphasize my confidence in the Biale family, the property owners behind this subdivision. They are longstanding members of our community who have consistently demonstrated their commitment to Napa and Napa County. Their dedication to thoughtful, responsible development reflects their genuine concern for the well-being of our city and its future.

For these reasons, I respectfully urge the City of Napa to approve the Zinfandel Subdivision. This project is both timely and essential, and I believe it will serve the best interests of our community.

Regards,

Barbara Bicais Foskett

3321 Greystone Ct, Napa, Ca. 94558

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***Barbara Foskett (FOSKETT)***

*Response to FOSKETT-1*

The comment is noted. Please refer to Master Response 1, Support for the Proposed Project, in Section 2, Master Responses, of this document. No further response is required.

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**To:**
Michael Allen, Senior Planner
City of Napa, Community Development Department
1600 First Street
Napa, CA 94559
Email: mallen@cityofnapa.org

**Re:** Comments on Draft Mitigated Negative Declaration for Zinfandel Subdivision Project (PL19-0016)

**Date:** 24 August 2025

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Dear Mr. Allen,

I am writing as a concerned resident and neighbor regarding the Draft Mitigated Negative Declaration (MND) for the proposed **Zinfandel Subdivision Project** at 1583 and 1687 El Centro Avenue. After reviewing the MND, CEQA Consistency Checklist, and supporting appendices, I believe the analysis is inadequate and that a full **Environmental Impact Report (EIR)** is required under CEQA. 1

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## 1. Flooding and Hydrology Concerns

The project site lies largely within **FEMA Flood Hazard Zone AE (100-year floodplain)**. Construction of terraces, grading, and impervious surfaces could worsen flooding and alter drainage into Salvador Channel.

Appendix F (Hydrology/Water Quality) admits that **soils are Hydrologic Group D (very poor infiltration)** and that multiple drainage areas (≈3,734 sq ft near El Centro Avenue, ≈700 sq ft near Lassen Street) will **not be treated before discharging stormwater**. 2

Additionally, project plans propose a **new flood terrace and stormwater outfalls directly into Salvador Creek**. These could destabilize the bank, increase erosion, and alter riparian hydrology.

**Objection**: The MND lacks a robust hydrologic model and ignores climate-driven storm risks. Alterations to the floodplain and untreated runoff create significant unmitigated impacts requiring an EIR.

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## 2. Impacts to Sensitive Wildlife 3

- A **juvenile northwestern pond turtle** was **observed on-site in Salvador Channel**. This is new evidence of a California Species of Special Concern. 3 CONT

- **Beaver dams are active in Salvador Creek** (Appendix B, p. 6 photo). Beaver ponds are keystone habitats, supporting amphibians, fish, and birds. Construction and hydrologic alterations risk destroying these sensitive features. 4

- Appendix B acknowledges potential roosting for **special-status bats** and nesting for migratory birds, but relies solely on pre-construction surveys, which may miss seasonal use. 5

**Objection**: CEQA requires an EIR where new evidence (turtle observation, beaver dams) indicates potentially significant impacts to sensitive wildlife. Reliance on surveys and generic mitigation is inadequate. 6

---

## 3. Riparian Habitat and Wildlife Corridor

Salvador Creek is one of the few riparian corridors in the area. The MND concedes the project will cause **0.20 acres of temporary impact and 0.01 acre of permanent impact to riparian habitat**. 7

**Objection**: Mitigation is limited to a **1:1 replacement ratio**, which fails to replicate lost ecological functions. A higher ratio and off-site restoration must be studied.

---

## 4. Tree Removal and Oak Habitat

The project removes **29 trees**, including a protected **valley oak (14.2” DBH)** and a **coast live oak (30” multi-trunk)**. Appendix B (Biological Resources) confirms these are **native oaks providing habitat**. Oaks are slow-growing, and their ecological role cannot be replaced by saplings for decades. 8

**Objection**: Tree canopy loss, habitat fragmentation, and increased urban heat island effects are significant impacts that were not fully considered.

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## 5. Construction Noise, Dust, and Health Risks

The MND acknowledges **18–36 months of construction**. 9

Appendix G (Noise) admits maximum **construction noise could exceed 85 dBA at 50 feet** during grading/demolition, well above Napa's 65 dBA residential limit. Adjacent property lines (like ours) will experience **even higher levels**. Yet no noise barriers or independent monitoring are proposed. 9 CONT

Appendix F confirms **≈5,000 cubic yards of soil disturbance**, producing dust and fine particulates. Combined with diesel emissions, this poses heightened risks for infants and pregnant individuals. 10

**Objection**: Noise and dust impacts were underestimated. CEQA requires site-specific modeling for sensitive receptors, not broad assurances.

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## 6. Air Quality and Greenhouse Gas Emissions

Appendix B (Air Quality/GHG) assumes "typical" equipment use, but the project will extend construction over multiple years. Prolonged diesel exhaust and particulate emissions disproportionately affect immediate neighbors.

Additionally, Napa Valley is already a **non-attainment area for ozone and PM2.5**. Even if thresholds are not individually exceeded, CEQA requires consideration of **cumulative regional impacts**. 11

**Objection**: The air quality analysis underestimates construction emissions and fails to address cumulative impacts.

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## 7. Traffic and School Safety

Appendix H (Transportation) projects **≈500 daily trips (≈50 peak-hour)** from the subdivision, considered "less than significant." However, **construction truck traffic was not analyzed at all**, despite the site's proximity to **Salvador Elementary and Willow Elementary Schools**. 12

**Objection**: Heavy trucks near schools present safety hazards not analyzed in the MND or traffic study. CEQA requires review of hazards from project design and circulation.

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## 8. Hazardous Materials from Former Vineyard Use

Appendix E (Hazards) acknowledges prior **vineyard use with pesticides** but provides **no soil sampling results**. The report defers evaluation until construction, stating procedures will be followed if contamination is found. 13

**Objection**: This deferral is improper under CEQA. Vineyard soils commonly contain residual lead-arsenate and petroleum byproducts, which should be tested before approval.

13 CONT

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## 9. Cumulative Impacts

The MND dismisses cumulative impacts as already covered by the General Plan EIR. Yet appendices show present-day stressors:

- Untreated stormwater (Appendix F).
- Construction noise overlapping with school activity (Appendix G).
- Air emissions in a non-attainment basin (Appendix B – Air).
- School traffic conflicts (Appendix H).

14

**Objection**: CEQA requires cumulative analysis using current conditions, not outdated plan-level assumptions.

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## 10. Lack of Alternatives

No alternatives were considered due to reliance on an MND. A clustered or reduced-density design could reduce floodplain encroachment, tree loss, and wildlife impacts. CEQA requires analysis of feasible alternatives in an EIR.

15

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## 11. Weaknesses in the CEQA Consistency Checklist

The applicant's Checklist claims impacts were already addressed in the 2020 General Plan EIR. This is legally and factually inadequate because:

- **New evidence**: pond turtle and beaver dams.
- **Site-specific conditions**: FEMA floodplain, poor soils, untreated stormwater.
- **Construction impacts**: 85 dBA noise (Appendix G), truck traffic (Appendix H), vineyard pesticide residues (Appendix E).

16

**Objection**: A checklist is not substantial evidence. New conditions and sensitive receptors trigger the need for an EIR. 16 CONT

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## Request

For the reasons above, I respectfully request that the City of Napa **require preparation of a full Environmental Impact Report (EIR)** for the Zinfandel Subdivision Project. 17

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## Fallback Mitigation Requests

If the City nevertheless considers adopting the MND, the following minimum mitigations should be imposed: 18

1. **Noise**: Limit construction to weekdays 8 a.m.–5 p.m.; require temporary sound barriers; prohibit evening/weekend work.
2. **Air Quality**: Continuous dust suppression; no diesel idling within 200 ft of homes; provide HEPA air filters to adjacent households. 19
3. **Traffic**: Construction traffic management plan restricting trucks away from schools; deliveries outside school pick-up/drop-off times. 20
4. **Monitoring**: Real-time noise, dust, and air monitoring at site boundaries, with public reporting. 21
5. **Trees**: Replace native trees at 3:1 ratio with 10-year monitoring. 22
6. **Hazards**: Conduct soil sampling for pesticides and publish results before any grading begins. 23
7. **Riparian Habitat**: Increase mitigation ratios (≥3:1) and include off-site restoration.

---

Thank you for the opportunity to comment. I urge the City to protect the health, safety, and environmental resources of our community by requiring a more thorough environmental review, or at minimum, adopting the above mitigations. 24

Sincerely,

Guy and Erendira Levin
155 Moss Lane, Napa, CA 94558
guylevin@me.com

### *Guy and Erendira Levin (G. AND E. LEVIN)*

*Response to G. AND E. LEVIN-1*

The comment is noted. Please refer to Master Response 3, General Opposition Comments Not Addressed in the Final MND, in Section 2, Master Responses, of this document. Master Response 3 provides a response to comments that express general opposition or disapproval of the proposed project. No further response is required.

*Response to G. AND E. LEVIN-2*

The comment is noted. Please refer to Master Response 7, Clarifying Information on the Stormwater Analysis, in Section 2, Master Responses, of this document. Master Response 7 provides clarifying information on the hydrology and water quality analysis for the proposed project, including a response to comments about potential flooding risk, stormwater runoff, and hydraulic modeling. No further response is required.

*Response to G. AND E. LEVIN-3*

The comment is noted. Please refer to Master Response 5, Clarifying Information on the Biological Resources Analysis, in Section 2, Master Responses, of this document. Master Response 5 provides clarifying information on the biological resources analysis for the proposed project, including a response to comments about special-status species, tree removal and mitigation, and Salvador Channel. No further response is required.

*Response to G. AND E. LEVIN-4*

The comment is noted. Please refer to Master Response 5, Clarifying Information on the Biological Resources Analysis, in Section 2, Master Responses, of this document. Master Response 5 provides clarifying information on the biological resources analysis for the proposed project, including a response to comments about special-status species, tree removal and mitigation, and Salvador Channel. No further response is required.

*Response to G. AND E. LEVIN-5*

The comment is noted. Please refer to Master Response 5, Clarifying Information on the Biological Resources Analysis, in Section 2, Master Responses, of this document. Master Response 5 provides clarifying information on the biological resources analysis for the proposed project, including a response to comments about special-status species, tree removal and mitigation, and Salvador Channel. No further response is required.

*Response to G. AND E. LEVIN-6*

The comment is noted. Please refer to Master Response 5, Clarifying Information on the Biological Resources Analysis, in Section 2, Master Responses, of this document. Master Response 5 provides clarifying information on the biological resources analysis for the proposed project, including a response to comments about special-status species, tree removal and mitigation, and Salvador Channel. No further response is required.

*Response to G. AND E. LEVIN-7*
The comment is noted. Please refer to Master Response 5, Clarifying Information on the Biological Resources Analysis, in Section 2, Master Responses, of this document. Master Response 5 provides clarifying information on the biological resources analysis for the proposed project, including a response to comments about special-status species, tree removal and mitigation, and Salvador Channel. No further response is required.

*Response to G. AND E. LEVIN-8*
The comment is noted. Please refer to Master Response 5, Clarifying Information on the Biological Resources Analysis, in Section 2, Master Responses, of this document. Master Response 5 provides clarifying information on the biological resources analysis for the proposed project, including a response to comments about special-status species, tree removal and mitigation, and Salvador Channel.

Please also refer to Master Response 3, General Opposition Comments Not Addressed in the Final MND, in Section 2, Master Responses, of this document. Master Response 3 provides a response to comments that express general opposition or disapproval of the proposed project. No further response is required.

*Response to G. AND E. LEVIN-9*
The comment is noted. Please refer to Master Response 8, Clarifying Information on the Noise Analysis, in Section 2, Master Responses, of this document. Master Response 8 provides clarifying information on the noise analysis for the proposed project, including a response to comments about potential noise and vibration impacts associated with the construction of the proposed project. No further response is required.

*Response to G. AND E. LEVIN-10*
The comment is noted. Please refer to Master Response 4, Clarifying Information on the Air Quality Analysis, in Section 2, Master Responses, of this document. Master Response 4 provides clarifying information related to the air quality analysis for the proposed project contained in the Consistency Checklist, including a response to comments related to construction impacts, potential health impacts, and fugitive dust. No further response is required.

*Response to G. AND E. LEVIN-11*
The comment is noted. Please refer to Master Response 4, Clarifying Information on the Air Quality Analysis, in Section 2, Master Responses, of this document. Master Response 4 provides clarifying information related to the air quality analysis for the proposed project contained in the Consistency Checklist, including a response to comments related to construction impacts, potential health impacts, and fugitive dust. No further response is required.

*Response to G. AND E. LEVIN-12*
The comment is noted. Please refer to Master Response 4, Clarifying Information on the Air Quality Analysis, in Section 2, Master Responses, of this document. Master Response 4 provides clarifying information related to the air quality analysis for the proposed project contained in the Consistency

Checklist, including a response to comments related to construction impacts, potential health impacts, and fugitive dust.

Please refer to Master Response 9, Clarifying Information on the Transportation Analysis, in Section 2, Master Responses, of this document. Master Response 9 provides clarifying information on the transportation analysis for the proposed project, including a response to comments related to safety, emergency access, traffic congestion, and the adequacy of the transportation analysis. No further response is required.

*Response to G. AND E. LEVIN-13*

The comment is noted. Please refer to Master Response 6, Clarifying Information on the Hazardous Materials Analysis, in Section 2, Master Responses, of this document. Master Response 6 provides clarifying information on the hazardous materials analysis for the proposed project, including a response to comments about soil contamination and the Phase I ESA's findings. No further response is required.

*Response to G. AND E. LEVIN-14*

The comment is noted. Please refer to Master Response 4, Clarifying Information on the Air Quality Analysis, in Section 2, Master Responses, of this document. Master Response 4 provides clarifying information related to the air quality analysis for the proposed project contained in the Consistency Checklist, including a response to comments related to construction impacts, potential health impacts, and fugitive dust.

Please also refer to Master Response 8, Clarifying Information on the Noise Analysis, in Section 2, Master Responses, of this document. Master Response 8 provides clarifying information on the noise analysis for the proposed project, including a response to comments about potential noise and vibration impacts associated with the construction of the proposed project.

Additionally, please refer to Master Response 9, Clarifying Information on the Transportation Analysis, in Section 2, Master Responses, of this document. Master Response 9 provides clarifying information on the transportation analysis for the proposed project, including a response to comments related to safety, emergency access, traffic congestion, and the adequacy of the transportation analysis.

As detailed in the Consistency Checklist, the project site is entirely surrounded by existing development, and there are no cumulative development projects adjacent to or in the immediate vicinity of the proposed project. The proposed project would not result in any potentially significant project-level impacts with the implementation of all applicable policies, regulations, COAs, and implementation measures, including IM CUL-1 through IM CUL-4 and IM GEO-1. Cumulatively, the proposed project would not result in any significant impacts that would substantially combine with impacts of other current or probable future projects. Thus, the proposed project, in conjunction with other future development projects, would not result in any cumulatively considerable impacts.

*Response to G. AND E. LEVIN-15*
The comment is noted. The proposed project relies on an MND supported by a Consistency Checklist. Under CEQA Guidelines Section 15183, if a project is consistent with the development density established by existing zoning or a general plan for which an EIR was certified, then environmental review is limited to effects that are:

- peculiar to the project or parcel,
- not previously analyzed as significant,
- newly significant due to new information, or
- more severe than previously disclosed.

The Consistency Checklist confirms that the proposed project does **not** result in new or more severe impacts than those identified in the 2020 General Plan Final EIR. The proposed project would result in less than significant impacts related to flooding, tree loss, and wildlife with the incorporation of mitigation as discussed in the MND and associated Consistency Checklist.

Under CEQA, the requirement to analyze project alternatives applies to EIRs, not to MNDs or statutory exemptions and streamlining provisions. While a full EIR typically includes a broader alternatives analysis, the use of an MND under CEQA Guidelines Section 15183 is legally appropriate here. The proposed project's consistency with zoning and the prior 2020 General Plan Final EIR, along with the implementation of mitigation measures, supports the conclusion that an EIR is not required.

*Response to G. AND E. LEVIN-16*
The comment is noted. Please refer to *Responses to G. AND E. LEVIN-2* through *G. AND E. LEVIN-14*. No further response is required.

*Response to G. AND E. LEVIN-17*
The comment is noted. Please refer to *Responses to G. AND E. LEVIN-2* through *G. AND E. LEVIN-14*. No further response is required.

*Response to G. AND E. LEVIN-18*
The comment is noted. Please refer to Master Response 8, Clarifying Information on the Noise Analysis, in Section 2, Master Responses, of this document. Master Response 8 provides clarifying information on the noise analysis for the proposed project, including a response to comments about potential noise and vibration impacts associated with the construction of the proposed project. No further response is required.

*Response to G. AND E. LEVIN-19*
The comment is noted. Please refer to Master Response 4, Clarifying Information on the Air Quality Analysis, in Section 2, Master Responses, of this document. Master Response 4 provides clarifying information related to the air quality analysis for the proposed project contained in the Consistency Checklist, including a response to comments related to construction impacts, potential health impacts, and fugitive dust. No further response is required.

*Response to G. AND E. LEVIN-20*
The MND acknowledges the proximity of Willow Elementary School to the project site. As detailed in the MND, the proposed project would not result in significant traffic-related impacts that would warrant mitigation under CEQA. Vehicular access to the project site is provided via Clementina Circle and a private driveway from Lassen Street, and the proposed project includes sufficient on-site parking and circulation improvements.

Because no significant impacts related to construction traffic near schools were identified, no mitigation measures, such as restricting truck routes or delivery times, would be required. However, standard construction practices and City requirements would continue to guide traffic management during construction to ensure public safety and minimize disruption. No further response is required.

*Response to G. AND E. LEVIN-21*
The comment is noted. Please refer to Master Response 4, Clarifying Information on the Air Quality Analysis, in Section 2, Master Responses, of this document. Master Response 4 provides clarifying information related to the air quality analysis for the proposed project contained in the Consistency Checklist, including a response to comments related to construction impacts, potential health impacts, and fugitive dust.

Please also refer to Master Response 8, Clarifying Information on the Noise Analysis, in Section 2, Master Responses, of this document. Master Response 8 provides clarifying information on the noise analysis for the proposed project, including a response to comments about potential noise and vibration impacts associated with the construction of the proposed project. No further response is required.

*Response to G. AND E. LEVIN-22*
The comment is noted. Please refer to Master Response 5, Clarifying Information on the Biological Resources Analysis, in Section 2, Master Responses, of this document. Master Response 5 provides clarifying information on the biological resources analysis for the proposed project, including a response to comments about special-status species, tree removal and mitigation, and Salvador Channel. No further response is required.

*Response to G. AND E. LEVIN-23*
The comment is noted. Please refer to Master Response 6, Clarifying Information on the Hazardous Materials Analysis, in Section 2, Master Responses, of this document. Master Response 6 provides clarifying information on the hazardous materials analysis for the proposed project, including a response to comments about soil contamination and the Phase I ESA's findings. No further response is required.

*Response to G. AND E. LEVIN-24*
The comment is noted. Please refer to Master Response 5, Clarifying Information on the Biological Resources Analysis, in Section 2, Master Responses, of this document. Master Response 5 provides clarifying information on the biological resources analysis for the proposed project, including a

response to comments about special-status species, tree removal and mitigation, and Salvador Channel. No further response is required.

**From:** Genie Levin
**To:** Michael Allen
**Subject:** Request for Full Environmental Impact Report for Zinfandel Subdivision
**Date:** Wednesday, August 27, 2025 10:19:35 PM

You don't often get email from genielevin@gmail.com. Learn why this is important

[EXTERNAL]

Dear Michael,

I am writing as a deeply concerned Napa resident regarding the proposed Zinfandel Subdivision Plan (PL19-0016). As both a homeowner whose property directly backs onto this land and a member of a community horrified by the City's recent notice, I feel compelled to express my strongest opposition to advancing this project without first requiring a **full Environmental Impact Report (EIR)** under CEQA.

It is deeply troubling that the City would consider rushing through a Draft Mitigated Negative Declaration (MND) when the impacts of this development are clearly significant. This land is simply not suitable for the proposed plan. The neighborhood infrastructure is not designed to accommodate construction at this level, which should have been part of the original build back in the late 90s/2000s in the area to mitigate the challenges it has. Approving the project at this stage without a comprehensive EIR would be **negligent, irresponsible, and ethically questionable, particularly as the landowners have already torn down the vineyards and begun preparations as though approval were guaranteed, well before the scheduled October 16 hearing.** 1

## Why is an EIR important?

- **Traffic and Road Safety:** The project proposes 51 homes plus ADUs in an area already constrained by narrow roads, limited parking, and daily gridlock from school drop-off at Willow Elementary, just a two-minute walk away. Introducing potentially 100+ additional vehicles that would come hand in hand with these properties will further overwhelm El Centro Avenue, which is also not capable of safely supporting construction equipment, heavy trucks, and long-term traffic. The risk of fire, accidents, injuries, and fatalities is unacceptably high. California Clean Air Act targets would be impossible to meet. 2
- **Zero Lot Line Properties:** Many surrounding homes, including mine, back directly onto this site with zero lot line separation. Construction noise, vibration, and heavy equipment operations will have direct and severe impacts on adjacent homes that have received no meaningful consideration in this plan. The proposed plans will damage and pollute our own properties. 3
- **Public Health:** The site's soil has already tested positive for arsenic and other contaminants from agricultural use. Coupled with diesel fumes, toxic dust, and unsafe noise over a projected three-year build, this construction would put hundreds of residents, children, the elderly, and vulnerable families at risk. Yet the Draft MND 4

dismisses these impacts as “less than significant.” These contaminants will also end up in the precious Salvador Creek due to ground disruption and impact waterways and wildlife throughout Napa. 4 CONT

- **Floodplain Development:** The property sits within a FEMA-designated floodplain. Without extensive engineering and mitigation, further grading and new stormwater outfalls will worsen flooding, degrade water quality, and expose both new and existing homes to greater risk. It will also prevent the ability of the proposed homeowners and current homeowners to take out suitable insurance. 5

- **Sensitive Habitat:** Salvador Creek is a vital riparian corridor that supports protected and endangered species, including the northwestern pond turtle, native salmon, beavers, and critical bat habitats. To claim these can simply be “mitigated” is inaccurate and unlawful under CEQA. 6

- **Tree and Habitat Loss:** The plan proposes removing 29 mature trees, including valley oaks essential for habitat, carbon storage, erosion, and flood resilience. This is a permanent ecological loss that heavily impacts the land. 7

I am expecting my first child this December. The thought of raising a baby less than a yard from an industrial-scale construction site, dismissed by the City as having “less than significant” impact on the community, is unacceptable, and I respectfully urge the Planning Department and City of Napa to do the right thing:

1. **Reject the Draft MND as inadequate** and require a full Environmental Impact Report to be conducted.
2. **Pause all land disturbance and demolition** until the above is completed.
3. **Extend the public comment period** to allow residents sufficient time to participate, as many residents have been left in the dark. Ensure meaningful outreach to many Spanish-speaking residents in the area who have not been provided with the option of translated documentation. 8

**This is not a matter to rush. Protecting community health, environmental integrity, and legal compliance requires transparency, diligence, and a full EIR. Anything less will jeopardize the health and safety of Napa residents, any proposed new residents for this site, and our most precious environment.**

I sincerely hope the right course of action will be taken, and if you have not visited the area around the Zinfandel Subdivision already, I would strongly recommend going in person to provide context from a resident's perspective before the hearing.

Yours truly,

Genie Levin

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***Genie Levin (G. LEVIN)***

*Response to G. LEVIN-1*

The comment is noted. Please refer to Master Response 3, General Opposition Comments Not Addressed in the Final MND, in Section 2, Master Responses, of this document. Master Response 3 provides a response to comments that express general opposition or disapproval of the proposed project.

Additionally, in accordance with City policy and practice, vegetation removal that does not require a permit is not subject to City review or approval and is not considered part of the discretionary project subject to CEQA analysis. No further response is required.

*Response to G. LEVIN-2*

The comment is noted. Please refer to Master Response 9, Clarifying Information on the Transportation Analysis, in Section 2, Master Responses, of this document. Master Response 9 provides clarifying information on the transportation analysis for the proposed project, including a response to comments related to safety, emergency access, traffic congestion, and the adequacy of the transportation analysis. No further response is required.

*Response to G. LEVIN-3*

The comment is noted. Please refer to Master Response 8, Clarifying Information on the Noise Analysis, in Section 2, Master Responses, of this document. Master Response 8 provides clarifying information on the noise analysis for the proposed project, including a response to comments about potential noise and vibration impacts associated with the construction of the proposed project. No further response is required.

*Response to G. LEVIN-4*

The comment is noted. Please refer to Master Response 4, Clarifying Information on the Air Quality Analysis; Master Response 6, Clarifying Information on the Hazardous Materials Analysis; Master Response 7, Clarifying Information on the Stormwater Analysis; and Master Response 8, Clarifying Information on the Noise Analysis, in Section 2, Master Responses, of this document. No further response is required.

*Response to G. LEVIN-5*

The comment is noted. Please refer to Master Response 7, Clarifying Information on the Stormwater Analysis, in Section 2, Master Responses, of this document. Master Response 7 provides clarifying information on the hydrology and water quality analysis for the proposed project, including a response to comments about potential flooding risk, stormwater runoff, and hydraulic modeling. No further response is required.

*Response to G. LEVIN-6*

The comment is noted. Please refer to Master Response 5, Clarifying Information on the Biological Resources Analysis, in Section 2, Master Responses, of this document. Master Response 5 provides clarifying information on the biological resources analysis for the proposed project, including a

response to comments about special-status species, tree removal and mitigation, and Salvador Channel. No further response is required.

*Response to G. LEVIN-7*
The comment is noted. Please refer to Master Response 5, Clarifying Information on the Biological Resources Analysis, in Section 2, Master Responses, of this document. Master Response 5 provides clarifying information on the biological resources analysis for the proposed project, including a response to comments about special-status species, tree removal and mitigation, and Salvador Channel. No further response is required.

*Response to G. LEVIN-8*
The comment is noted. The proposed project is not an "industrial-scale construction site" as described by the comment; instead, it would develop a 51-lot subdivision containing 51 single-family homes, 12 ADUs, 10 junior ADUs, and related improvements on approximately 9.56 acres. The proposed project relies on an MND supported by a Consistency Checklist. Under CEQA Guidelines Section 15183, if a project is consistent with the development density established by existing zoning or a general plan for which an EIR was certified, then "CEQA mandates" that the environmental review is limited to effects that are:

- peculiar to the project or parcel,
- not previously analyzed as significant,
- newly significant due to new information, or
- more severe than previously disclosed.

As a result, Section 15183 requires that the City focus only on new or more severe impacts and does not revisit issues already addressed in the 2020 General Plan Final EIR. This streamlining is not discretionary; it is required by law. Consistent with these legal requirements, the Consistency Checklist confirms that the proposed project does not result in new or more severe impacts than those identified in the 2020 General Plan Final EIR. The proposed project would result in less than significant impacts related to flooding, tree loss, and wildlife with the incorporation of mitigation as discussed in the MND and associated Consistency Checklist.

The use of an MND under CEQA Guidelines Section 15183 is legally mandated here. The proposed project's consistency with zoning and the prior 2020 General Plan Final EIR, along with the implementation of mitigation measures, supports the conclusion that an EIR is not required.

Because the MND process is the legally appropriate environmental review for this project, there is no legal basis to pause land disturbance or demolition beyond what is required by law.

The public comment period for the MND has been established in accordance with CEQA Guidelines Section 15073, which requires a minimum 30-day review period. The City has complied with all public notice and outreach requirements, including posting and circulating the MND as required by law. As such, an extended comment period is not required. No further response is required.

**Laura Campion**

**Subject:** FW: Zinfandel Subdivision Project

**From:** Jonathan Gottlieb <jzgottlieb@gmail.com>
**Sent:** Thursday, August 14, 2025 9:16 PM
**To:** Michael Allen <mallen@cityofnapa.org>
**Cc:** Regina Gottlieb <ginak5591@gmail.com>
**Subject:** Zinfandel Subdivision Project

You don't often get email from jzgottlieb@gmail.com. Learn why this is important

[EXTERNAL]

Mr. Allen:

As owners of a property on El Centro Avenue in the Hampton Faire Subdivision between Byway East and Jefferson Street, I am writing to express concerns my wife Regina and I have about the proposed Zinfandel Subdivision Project to be located at 1583 and 1687 El Centro Avenue, east of SR 29. When this project was initially brought to our attention by Randy Gularte, we met with him to review the initial subdivision plans. At that time, we shared with him and followed up with an email expressing concerns about the traffic challenges that the additional housing would create. He indicated our concerns would be shared with the traffic consultant when the time came to evaluate the project before submitting the application.

After reviewing the full plans for this project, we offer the following comments:

- We agree more housing is needed in the Napa Valley, including affordable housing. We also believe that housing projects need to be carefully planned, especially with regard to infrastructure and the surrounding area. More recently, we have seen projects that do not meet this standard. For example, the Subdivision at Wine Country and Linda Vista Avenue has a high wall and fence on Linda Vista and drainage areas in front and side yards for a number of the homes. It could have been planned with tiering through the project so the area at Linda Vista would not be an eyesore, and a different approach to drainage so there would be a common area rather than in owner's yards. In our view, the Zinfandel Subdivision Project does not meet the standard for careful planning given density and impact on the surrounding area. New housing projects should maintain the aesthetic of the Napa Valley rather than be overbuilt or poorly planned. 1

- The traffic study suggests that the additional 500+ vehicular trips per day on El Centro to Byway East-Wine Country-SR 29 and in the other direction to Jefferson Street will not pose an additional burden. This study was completed in August, so it is not clear if it took into account actual conditions during commute hours and during the morning and afternoon times when parents are dropping off or picking up children from a number of schools in the area, including the one on El Centro Avenue. 2

- Without the proposed subdivision, there are times of day when travel to SR 29 or Jefferson Street is challenging. Anyone who travels from El Centro to SR 29 using Byway East at Wine Country would tell you that it is difficult to get to SR 29 from Byway East given the short distance and an 3

area that only accommodates 2-3 vehicles at the traffic light. With the ability to make a right turn onto Wine Country at the red light heading north on SR 29, vehicles at the Byway East stop signs are further limited to make the turns to get to SR 29. Going in the opposite direction to Jefferson Street becomes a challenge during school start and end of day when parents are stacked up dropping off or waiting for their school age children.

3 CONT

- El Centro Avenue is narrow in some areas and without adequate sidewalks in others. It is unclear if the project calls for the builder to add sidewalks to the entire distance of El Centro from Byway East to Jefferson Street on both sides of the street. With young school children traversing this street, it is in their best interest to have safe sidewalk areas to use.

4

- For bicycle transit, El Centro would enable bicycles to share the road with automobile traffic. With over 500 anticipated new trips each day, this poses a recipe for accidents. Instead, a bicycle lane should be added, even if the project requires widening areas of El Centro Avenue to accommodate.

5

As you can appreciate, our concerns are with ensuring adequate infrastructure to support this many homes that would generate a significant increase in vehicular traffic. Given this, we cannot support a housing project that increases risk to children and vehicular traffic, and may not be not well thought through.

Thank you,
Jonathan Gottlieb
707.255.0689

***Jonathan Gottlieb (GOTTLIEB)***

*Response to GOTTLIEB-1*

The comment is noted. As detailed in Section 4.1, Aesthetics, of the Consistency Checklist, the proposed project is located in an urbanized area within the City and would be consistent with the land use and zoning designations of the project site with the use of Small Lot Development Standards allowed under the State Density Bonus Law. The proposed project would also be consistent with the required density for the RS 4 zoning district and would be required to comply with Napa Policy Resolution No. 27, which requires new developments to install lighting that limits light spillage into neighboring properties; to produce a final landscape and irrigation plan, designed and signed by a licensed landscape architect or landscape contractor, that specifies that all plant materials used are free of pests; and to notify the Agricultural Commissioner of any plant deliveries from outside the County. The proposed project would also be required to comply with the architectural requirements of Napa Residential Design Guidelines and the General Plan. The Napa Residential Design Guidelines impose requirements for new developments in residential neighborhoods, including site plan requirements, grading and drainage control measures, landscaping standards, fencing and screening requirements, driveway and parking standards, and utility requirements. Therefore, the proposed project would not conflict with applicable zoning or other regulations governing scenic quality and impacts would be less than significant.

*Response to GOTTLIEB-2*

The comment is noted. Please refer to Master Response 9, Clarifying Information on the Transportation Analysis, in Section 2, Master Responses, of this document. Master Response 9 provides clarifying information on the transportation analysis for the proposed project, including a response to comments related to safety, emergency access, traffic congestion, and the adequacy of the transportation analysis. No further response is required.

*Response to GOTTLIEB-3*

The comment is noted. Please refer to Master Response 9, Clarifying Information on the Transportation Analysis, in Section 2, Master Responses, of this document. Master Response 9 provides clarifying information on the transportation analysis for the proposed project, including a response to comments related to safety, emergency access, traffic congestion, and the adequacy of the transportation analysis. No further response is required.

*Response to GOTTLIEB-4*

The comment is noted. Please refer to Master Response 9, Clarifying Information on the Transportation Analysis, in Section 2, Master Responses, of this document. Master Response 9 provides clarifying information on the transportation analysis for the proposed project, including a response to comments related to safety, emergency access, traffic congestion, and the adequacy of the transportation analysis. No further response is required.

*Response to GOTTLIEB-5*

The comment is noted. Please refer to Master Response 9, Clarifying Information on the Transportation Analysis, in Section 2, Master Responses, of this document. Master Response 9

provides clarifying information on the transportation analysis for the proposed project, including a response to comments related to safety, emergency access, traffic congestion, and the adequacy of the transportation analysis. No further response is required.

**From:** Lindsay Groff
**To:** mallen@cityofnapa.org
**Subject:** Zinfandel Subdivision Project
**Date:** Thursday, September 4, 2025 2:33:58 PM

You don't often get email from lyngroff@comcast.net. Learn why this is important

[EXTERNAL]

Lindsay & Steven Groff
2440 Norton Street
Napa, CA 94558

City of Napa Community Development Department
1600 First Street
Napa, CA 94559

Attention Michael Allen

I am writing today regarding the proposed Zinfandel Subdivision Project

As long time Napa residents we would like to offer our full support of this project. Napa is seriously lacking adequate housing for its population, especially housing that is close to schools. We have had children in the NVUSD since the year 2000, with our youngest graduating this last year and one of our oldest with children of their own fast approaching school age. It is incredibly disheartening that our adult children were forced to move out of the city of Napa due to the inability to find appropriate long term housing. We need more housing in Napa. It is vital to the community that the next generations can grow and thrive in the same town that they grew up in. The housing market in Napa drives young families away and the school district and overall community is suffering as a result. Any project that increases housing in Napa has our full support. 1

Please listen to the residents of Napa who have been very vocal about the need for more housing. It's time to prioritize people over produce and having a Vineyard taking up space in the heart of what could be a thriving residential space makes NO SENSE AT ALL.

Bravo to this project for prioritizing the needs of Napa families!

Please approve this project to move forward.

Sincerely,

Steven & Lindsay Groff

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***Steven and Lindsay Groff (GROFF)***

*Response to GROFF-1*

The comment is noted. Please refer to Master Response 1, Support for the Proposed Project, in Section 2, Master Responses, of this document. No further response is required.

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**From:** Jason Honsvick
**To:** mallen@cityofnapa.org
**Subject:** Zinfandel Subdivision project
**Date:** Thursday, September 4, 2025 4:27:39 PM

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[You don't often get email from jhonsvick707@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification ]

[EXTERNAL]

The development of the Zinfandel subdivision would be a great support for the city of Napa school system. New families equals new kids to enroll. These families will have a great pick of schools from elementary to high school all within blocks of their homes. I believe this to be my most positive reason for this development. 1

Jason Honsvick

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***Jason Honsvick (HONSVICK)***

*Response to HONSVICK-1*

The comment is noted. Please refer to Master Response 1, Support for the Proposed Project, in Section 2, Master Responses, of this document. No further response is required.

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**From:** JoeA Fontana
**To:** mallen@cityofnapa.org
**Subject:** Zinfandel Subdivision Project - Support
**Date:** Wednesday, September 3, 2025 11:25:40 PM

You don't often get email from jfontanaa@gmail.com. Learn why this is important

[EXTERNAL]

Dear Mr. Michael Allen, Acting Planning Manager

My name is Joe Fontana. I have called Napa my home for 56 years. I am writing as a community member to voice my strong support for the proposed housing project identified as the Zinfandel Subdivision Project.

The City's consistency checklist shows that this project is in line with the development zoning set by the City's 2020 General Plan. It also confirms that all environmental impacts were already studied and addressed in that plan, meaning there is no need for further review in those areas.

The checklist also makes it clear that the project doesn't create new or unusual impacts for this property, nor does it add off-site or cumulative impacts beyond what was already studied. In other words, this project fits within what the City has already planned for in 2020. 1

Beyond being consistent with the City's planning and environmental standards, this project would provide something our community greatly needs: more housing. By building responsibly on this 9.5-acre parcel, the City can help meet housing goals, create opportunities for families, and support local economic growth, all while staying true to the protections in place from the 2020 General Plan.

For these reasons, I respectfully ask that the City Planning Commission moves forward and approves the proposed housing project. It represents smart growth and a positive step forward for our community.

Thank you for considering my comments.

Sincerely,

Joe Fontana

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***Joe Fontana (J. FONTANA)***

*Response to J. FONTANA-1*

The comment is noted. Please refer to Master Response 1, Support for the Proposed Project, in Section 2, Master Responses, of this document. No further response is required.

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**Laura Campion**

**Subject:** FW: Zinfandel Subdivision

**From:** Carl Johnson <johnson_carl2012@yahoo.com>
**Sent:** Wednesday, August 27, 2025 3:53 PM
**To:** mallen@cityofnapa.org
**Subject:** Zinfandel Subdivision

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[EXTERNAL]

I oppose the Mitigated Negative Declaration for Zinfandel Subdivision (PL19-0016) and want a full Environmental Impact Report. 1

Thank you

Carl Johnson
15 Falcon Crest Cir
Napa, CA. 94558

Sent from Yahoo Mail for iPhone

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***Carl Johnson (JOHNSON)***

*Response to JOHNSON-1*

The comment is noted. Please refer to Master Response 3, General Opposition Comments Not Addressed in the Final MND, in Section 2, Master Responses, of this document. Master Response 3 provides a response to comments that express general opposition or disapproval of the proposed project. No further response is required.

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**From:** Fontana, Kristie
**To:** mallen@cityofnapa.org
**Subject:** Zinfandel Subdivision Project
**Date:** Friday, September 5, 2025 7:48:24 AM

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[EXTERNAL]

Dear Mr. Allen,

I'm writing to share my support for the housing project on the 9.56-acre site located at 1583 and 1687 El Centro Avenue, Assessor's Parcel Numbers (APN) 038-361-009 and 038-361-010.

The City's consistency checklist shows this project follows the 2020 General Plan and zoning, and that nearly all environmental impacts were already studied and addressed back then.

This project doesn't create new or unusual impacts—it fits within what the City already planned for. More importantly, it provides something the community really needs: more housing. Approving this project means new opportunities for families and responsible growth for our city.

I respectfully ask you to support and approve this housing project.

Sincerely,

Kristie Fontana

1

**Kristie Fontana | CISR**
Sr Account Manager | CA License #0C40031 | Commercial Lines
**Risk Strategies**
**Part of the Brown & Brown Team**
In California DBA RSC of California Insurance Brokerage Inc, License #0F06675
p 707-657-4500
kfontana@risk-strategies.com
3663 N Laughlin, Suite 201 | Santa Rosa, CA 95403
Riskstrategies.com

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***Kristie Fontana (FONTANA)***

*Response to FONTANA-1*

The comment is noted. Please refer to Master Response 1, Support for the Proposed Project, in Section 2, Master Responses, of this document. No further response is required

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**From:** Katherine Van Treese
**To:** mallen@cityofnapa.org
**Subject:** Fwd: Zinfandel Subdivision
**Date:** Monday, August 25, 2025 10:15:32 AM

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[EXTERNAL]

To Whom It May Concern,

I am writing to oppose the Zinfandel subdivision that is proposed off of El Centro Avenue. I used to live on Moss Lane and am very familiar with this project and the many stages it has gone through, with very little consideration for the impacts on the neighborhood. I have two children to attend Willow Elementary School and there is absolutely no consideration for the traffic/parking impact that this subdivision will have on the school and neighboring communities. El Centro is already a busy enough street. Adding 50+ houses is going to create a bottleneck and an unsafe environment for children going to and from school, especially considering so many kids in the neighborhood walk and ride their bikes to school. Please also consider the following: 1

Flood & Stormwater Risks Project requires a flood terrace and deletion of a lot to allow 100-year overland flow along Salvador Channel. Tentative map shows stormwater areas labeled “UNTREATED.” This is unacceptable directly adjacent to a creek. 2

Soil Contamination & Public Health DTSC flagged risks of pesticides, arsenic, and petroleum residues on historic vineyard land. Phase I ESA already recommends subsurface sampling. No Phase II has been done. 3

Transportation & Safety Traffic study is from 2019, before COVID, SB 743 VMT rules, and today’s school congestion. No current Safe Routes to School analysis for El Centro Ave. 4

Loss of Public Access City bike/ped plan envisions a Class I Salvador Creek Trail. Project instead makes creek-side terraces exclusive HOA space. 5

Biological & Tree Loss Removal of 29 trees and disturbance of riparian edge. Needs full surveys, higher tree replacement ratios, and riparian setback. 6

Noise & Neighborhood Fit Grading next to homes and schools; two-story massing along creek edge. Request stricter noise hours and step-down building heights. 7

Conclusion: The City cannot rely on a “Mitigated Negative Declaration” under CEQA §15183. This project’s peculiar flood, soil, traffic, and public access issues demand a full EIR. 8

Katherine Van Treese

--
*Katherine Van Treese*
*kesshafer@gmail.com*

***Katherine Van Treese (K. VAN TREESE)***

*Response to K. VAN TREESE-1*

The comment is noted. Please refer to Master Response 9, Clarifying Information on the Transportation Analysis, in Section 2, Master Responses, of this document. Master Response 9 provides clarifying information on the transportation analysis for the proposed project, including a response to comments related to safety, emergency access, traffic congestion, and the adequacy of the transportation analysis. No further response is required.

*Response to K. VAN TREESE-2*

The comment is noted. Please refer to Master Response 7, Clarifying Information on the Stormwater Analysis, in Section 2, Master Responses, of this document. Master Response 7 provides clarifying information on the hydrology and water quality analysis for the proposed project, including a response to comments about potential flooding risk, stormwater runoff, and hydraulic modeling. No further response is required.

*Response to K. VAN TREESE-3*

The comment is noted. Please refer to Master Response 6, Clarifying Information on the Hazardous Materials Analysis, in Section 2, Master Responses, of this document. Master Response 6 provides clarifying information on the hazardous materials analysis for the proposed project, including a response to comments about soil contamination and the Phase I ESA's findings. No further response is required.

*Response to K. VAN TREESE-4*

The comment is noted. Please refer to Master Response 9, Clarifying Information on the Transportation Analysis, in Section 2, Master Responses, of this document. Master Response 9 provides clarifying information on the transportation analysis for the proposed project, including a response to comments related to safety, emergency access, traffic congestion, and the adequacy of the transportation analysis. No further response is required.

*Response to K. VAN TREESE-5*

The comment is noted. Please refer to Master Response 9, Clarifying Information on the Transportation Analysis, in Section 2, Master Responses, of this document. Master Response 9 provides clarifying information on the transportation analysis for the proposed project, including a response to comments related to safety, emergency access, traffic congestion, and the adequacy of the transportation analysis. No further response is required.

*Response to K. VAN TREESE-6*

The comment is noted. Please refer to Master Response 5, Clarifying Information on the Biological Resources Analysis, in Section 2, Master Responses, of this document. Master Response 5 provides clarifying information on the biological resources analysis for the proposed project, including a response to comments about special-status species, tree removal and mitigation, and Salvador Channel. No further response is required.

*Response to K. VAN TREESE-7*

The comment is noted. As detailed in Section 4.1, Aesthetics, of the Consistency Checklist, the proposed project is located in an urbanized area within the City and would be consistent with the land use and zoning designations of the project site with the use of Small Lot Development Standards allowed under the State Density Bonus Law. The proposed project would also be consistent with the required density for the RS 4 zoning district and would be required to comply with Napa Policy Resolution No. 27, which requires new developments to install lighting that limits light spillage into neighboring properties; to produce a final landscape and irrigation plan, designed and signed by a licensed landscape architect or landscape contractor, that specifies that all plant materials used are free of pests; and to notify the Agricultural Commissioner of any plant deliveries from outside the County. The proposed project would also be required to comply with the architectural requirements of the Napa Residential Design Guidelines and the General Plan. The Napa Residential Design Guidelines impose requirements for new developments in residential neighborhoods, including site plan requirements, grading and drainage control measures, landscaping standards, fencing and screening requirements, driveway and parking standards, and utility requirements. Therefore, the proposed project would not conflict with applicable zoning or other regulations governing scenic quality and impacts would be less than significant.

Please also refer to Master Response 2, Non-CEQA Issues Not Addressed in the Final MND, in Section 2, Master Responses, of this document. Master Response 2 provides additional information on the scope of CEQA and any non-CEQA issues are not further discussed in the Final MND.

Additionally, please refer to Master Response 8, Clarifying Information on the Noise Analysis, in Section 2, Master Responses, of this document. Master Response 8 provides clarifying information on the noise analysis for the proposed project, including a response to comments about potential noise and vibration impacts associated with the construction of the proposed project. No further response is required.

*Response to K. VAN TREESE-8*

The comment is noted. Please refer to *Responses to K. VAN TREESE-1* through *K. VAN TREESE-7.* No further response is required.

**From:** Anna Kim
**To:** Mallen@cityofnapa.org
**Subject:** Zinfandel Subdivision Project
**Date:** Saturday, September 6, 2025 9:05:40 PM

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[You don't often get email from akskyw@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification ]

[EXTERNAL]

Dear City of Napa Community Development Dept.
I am writing to you in support of approving the Zinfandel Subdivision project. With the limited inventory of housing options in Napa, the cost of living here has pushed many families away from the Napa Valley, impacting our school enrollment and the ability to maintain a workforce. I live in the adjoining neighborhood and have no objection to converting a vineyard property to a housing subdivision. We have a large monoculture here with a glut in the sales anyhow. This property was not a part of the agricultural preserve and any homeowner in the adjacent area should have been aware that the property could be developed someday. Since your review indicates that environmental impacts should be negligible, I have no concerns. The area is easily accessible with multiple routes of traffic that should not impact traffic patterns in any great way. I realize I am a day late per the deadline, but today was my first day off. Please consider my support for the project.
Kindest regards,
Anna Kim

1

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***Anna Kim (KIM)***

*Response to KIM-1*

The comment is noted. Please refer to Master Response 1, Support for the Proposed Project, in Section 2, Master Responses, of this document. No further response is required.

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**From:** Emily King
**To:** mallen@cityofnapa.org
**Subject:** Zinfandel Subdivision Project
**Date:** Wednesday, September 3, 2025 8:32:42 PM

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[EXTERNAL]

Dear Mike Allen,

My name is Emily King, and I have been a resident in Napa for over nine years. I am writing in support of the Zinfandel Subdivision Project. My home for the past four years is on Unwin Drive, and it backs into the proposed development on El Centro.

From working in hospitality, small businesses, and now affordable housing, I know first hand how important affordable housing is, especially for single adults and families. I am fortunate enough to live in a low income ADU on Unwin Drive, and am thankful everyday for my housing, even though with my single income it takes an entire paycheck to pay my rent. Without the ADU I would be unable to live in Napa Valley or the surrounding areas.

From my understanding, the over nine acres includes over 45 single family homes, and 3 ADUs. This city and valley is in dire need of affordable housing, and this project can help start closing the gap. We have plenty of hotels, and with tourist numbers decreasing, and cost of living increasing for all the workers and families in Napa Valley, the need for more affordable housing is growing dramatically. 1

All necessary studies and projects have been completed for the project. Other resident concerns are falling flat. Traffic is always an issue, however, increased housing here would decrease traffic coming into the valley because the commute would be shorter. I understand the neighbors and community will have to adjust to the change. While that is never easy, this is a necessary change to help keep Napa Valley alive. Without affordable housing, the valley will not have workers to staff the hotels, wineries, or vineyards.

I wholeheartedly urge the Planning Commission to approve this project and expedite all permits moving forward.

Thank you for your time,

Emily King

emilycking11@gmail.com
626.201.4364

***Emily King (KING)***

*Response to KING-1*

The comment is noted. Please refer to Master Response 1, Support for the Proposed Project, in Section 2, Master Responses, of this document. No further response is required.

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To the Community Development Dept.

I am writing to express my support for the Zinfandel Subdivision project.

The development of 51 single-family homes and accessory dwellings Units (ADUs) will provide needed housing opportunities in our city. The projects location is well suited for this type of development and has been planned in alignment with the city's General plan and environmental considerations. Potential environmental ~~impacts~~ have been ~~thoroughly~~ thoroughly reviewed and includes mitigating measures to help minimize any negative effects on the surrounding area.

I support the inclusion of junior ADU's, & ADUs & the potential for additional affordable housing options.

I encourage the City of Napa to move forward with the Zinfandel Subdivision Project.

1

Thank-you

Angela J Kirk.

a resident of Napa since 1976

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***Angela Kirk (KIRK)***

*Response to KIRK-1*

The comment is noted. Please refer to Master Response 1, Support for the Proposed Project, in Section 2, Master Responses, of this document. No further response is required.

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**From:** F Lichtenstein
**To:** mallen@cityofnapa.org
**Subject:** Zinfandel Subdivision
**Date:** Thursday, September 4, 2025 12:52:42 PM

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[EXTERNAL]

Hi there,
Just writing in to say that I oppose the Mitigated Negative Declaration for Zinfandel Subdivision (PL19-0016) and want a full Environmental Impact Report. 1

Thank you,
Flora

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***Flora Lichtenstein (LICHTENSTEIN)***

*Response to LICHTENSTEIN-1*

The comment is noted. Please refer to Master Response 3, General Opposition Comments Not Addressed in the Final MND, in Section 2, Master Responses, of this document. Master Response 3 provides a response to comments that express general opposition or disapproval of the proposed project. No further response is required.

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**From:** edmartinez526@yahoo.com
**To:** mallen@cityofnapa.org
**Subject:** Zinfandel Subdivision Project
**Date:** Thursday, September 4, 2025 10:29:38 AM

You don't often get email from edmartinez526@yahoo.com. Learn why this is important

[EXTERNAL]

Hello Mike,

I am writing on behalf of the proposed Zinfandel Subdivision Project and would like to offer my full support. I believe that all the necessary studies were done to understand the impact in terms of traffic, wildlife and flooding and I feel confident that there will not be any negative ramifications. As a resident of the neighborhood for this proposed plan, I can understand the hesitation with a large construction project taking place but believe it to be necessary. Napa is a community that thrives on tourism and without having the necessary housing available to those that work here in our Hospitality Industry, it forces them to commute from cities like Vallejo, American Canyon, Fairfield, etc. Without having locals to help support our economy, we are forced to rely solely on tourism. As we have seen in recent years, the wine and hospitality industry has seen a large decline of visitors, which has negatively impacted many businesses. By giving families the opportunity to live where they work, we are putting more money back into our city. Additionally, I support these single-family homes versus any additional hotels or apartment complexes in this space. When I first moved to Napa in 2018, I stayed in an apartment complex and during my 6 years living there, saw 2 additional complexes go up within a 1/4 mile of each other. With multiple apartment complexes within such close proximity of each other, there were always issues with parking. I would rather have homes in our neighborhood than create another large apartment complex or hotel that will ultimately create more traffic and space issues. 1

I would just like to once again say that I am behind this project 100% and feel that it will add value to our community. Thank you for your time.

Kindly,
Erika Martinez

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***Erika Martinez (MARTINEZ)***

*Response to MARTINEZ-1*

The comment is noted. Please refer to Master Response 1, Support for the Proposed Project, in Section 2, Master Responses, of this document. No further response is required.

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**From:** Jacqui McNeelan
**To:** Michael Allen
**Subject:** Zinfandel Subdivision
**Date:** Monday, September 1, 2025 7:51:14 AM

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[EXTERNAL]

I oppose the Mitigated Negative Declaration for Zinfandel Subdivision (PL19-0016) and want a full Environmental Impact Report. 1

El Centro is way too small and narrow as it is, adding this many houses is going to be disasterous! 2

Jacqui McNeelan

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***Jacqui McNeelan (MCNEELAN)***

*Response to MCNEELAN-1*

The comment is noted. Please refer to Master Response 3, General Opposition Comments Not Addressed in the Final MND, in Section 2, Master Responses, of this document. Master Response 3 provides a response to comments that express general opposition or disapproval of the proposed project. No further response is required.

*Response to MCNEELAN-2*

The comment is noted. Please refer to Master Response 3, General Opposition Comments Not Addressed in the Final MND, in Section 2, Master Responses, of this document. Master Response 3 provides a response to comments that express general opposition or disapproval of the proposed project.

Additionally, please refer to Master Response 9, Clarifying Information on the Transportation Analysis, in Section 2, Master Responses, of this document. Master Response 9 provides clarifying information on the transportation analysis for the proposed project, including a response to comments related to safety, emergency access, traffic congestion, and the adequacy of the transportation analysis. No further response is required.

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**From:** Kate Mercier
**To:** Michael Allen
**Cc:** Lovie
**Subject:** Comments on MND for the Zinfandel Subdivison Project/Request for Supplemental Traffic Study
**Date:** Friday, September 5, 2025 2:46:58 PM
**Attachments:** Zinfandelprojectaccess-2025.png

You don't often get email from katemercier1@gmail.com. Learn why this is important

[EXTERNAL]

Dear Mr. Allen,

As local stakeholders invested in the long-term vitality of our community and as residents who live directly across the street from the Zinfandel Subdivision Project, we respectfully request changes to the current proposal for the Zinfandel Subdivision Project.

1. CURRENT SUBDIVISION MAP AND ACCESS POINTS: One of the two entry/exit points for the subdivision is currently planned directly in front of our residence at 1580 El Centro Avenue. This creates a significant and personal concern regarding safety, accessibility, and daily disruption. The increased traffic volume, turning movements, and potential queuing will directly impact our ability to safely enter and exit our property. We urge the City to reevaluate this placement and consider alternative access points that minimize direct impact on existing homes. 1

2. TRAFFIC: The traffic study presented in the documentation is insufficient and we request a supplemental traffic study to more fully assess the cumulative and corridor-level impacts of this development. While the Draft Mitigated Negative Declaration (MND) addresses internal circulation and parking, it does not adequately consider several external factors that could significantly affect traffic flow, safety, and neighborhood quality of life from the cumulative impact of more recent developments including the cumulative impact of:

- *Wine Country Avenue Development:* The recent residential build-out along Wine Country Avenue has increased vehicle volume and corridor pass-through traffic. The Zinfandel project's proximity to this area warrants a broader analysis of east-west connectivity and congestion, especially during peak hours.
- *Unidos Middle School:* The addition of Unidos Middle School introduces new traffic patterns, school drop-off congestion, and pedestrian safety concerns. This is in addition to the cross-through traffic on El Centro Ave. for both Vintage HS and Justin Sienna HS, which also has a significant impact. These impacts are not reflected in the current study, yet they are critical to understanding real-world conditions and are obvious in the traffic congestion at the 29/Bypass intersection. 2
- *Nearby development approved for 1556 El Centro Ave.:* The study does not account for other nearby developments or anticipated growth, which could compound traffic challenges over time, including the new subdivision also approved for lot at 1556 El Centro Ave.

Also, the MND states that this project is in line with 2020 General Plan but there are significant gaps and inconsistencies:

| General Plan Priority | Zinfandel Proposal | Unaddressed Gaps |
|---|---|---|
| **Traffic Calming** | Loop street may reduce internal speed | No roundabouts, raised crosswalks, or speed mitigation |
| **School Zone Safety** | No direct mention | No safe routes or traffic modeling near Willow Elementary |
| **Intersection Upgrades** | None proposed | El Centro/Jefferson and El Centro/Byway East not addressed |
| **Emergency Access** | Driveway access from Lassen Street | No evacuation modeling or coordination with emergency services |

2 CONT

3. CONSTRUCTION GRADING & STAGING: The MND references general grading and excavation activities but does not detail how existing streets will be prepared or reinforced for heavy construction vehicles. Given the proximity to our home, we are concerned about vibration, dust, and potential damage from prolonged truck traffic. A construction staging and grading plan should be included to address these impacts and outline mitigation measures.

Additionally, the real estate market in Napa has softened considerably over the past two years, with median home prices declining by nearly 17% year-over-year. This trend suggests caution in overbuilding and underscores the importance of aligning infrastructure and community readiness before flooding the market with more inventory.

3

Thank you for your consideration. We trust you also want to demonstrate a proactive commitment to community safety, infrastructure resilience, and equitable planning. We welcome the opportunity to support this process and ensure the project reflects the best interests of Napa residents and the El Centro neighborhood.

Regards,
Kate and Keith Mercier
1580 El Centro Ave., Napa, CA 94558
(415 )867-4111
(415) 317-4614

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***Kate Mercier (MERCIER)***

*Response to MERCIER-1*

The comment is noted. Given that 65 percent of trips are expected to be to/from the State Route (SR) 29 corridor, about 22 vehicles would be expected to exit or enter the subdivision at the proposed new street connection during the highest-volume hour of the day. This translates to about one vehicle turning into or out of the side street every 3 minutes, on average. This nominal volume of traffic can reasonably be expected to have little effect on the safety and convenience of the residents in this household entering and exiting their driveway. No further response is required.

*Response to MERCIER-2*

The comment is noted. The transportation study includes "Future" and "Future Plus Project" scenarios that reflect volumes anticipated in the year 2040 upon the buildout of the land uses in the General Plan. The model-generated volumes for future years tend to overstate volumes actually achieved and so would reasonably be expected to account for the additional trips associated with the developments noted in the comment. Under these projected future volumes with project trips added, both study intersections are expected to operate at LOS C or better, well above the City's LOS D standard.

The commenter also notes some perceived gaps in the analysis, including addressing the need for traffic calming and intersection upgrades, as well as analysis of school zone safety and emergency access. The need for traffic calming measures is not typically an environmental impact issue, though it could be considered if there were a demonstrated safety concern. However, the transportation study includes an evaluation of traffic collisions, from which it was determined that there is not a specific safety concern. Similarly, the need for intersection upgrades to increase capacity is not a transportation impact; rather, it is related to City policy and operational considerations. Because both study intersections are projected to continue operating acceptably per the City's standard under future volumes with the proposed project added, no upgrades are warranted. The issue of school safety is generally applicable to road segments providing direct access to the school site, and the project site is not contiguous to the school site. The proposed project would include the installation of sidewalks along its frontage on El Centro Avenue, thereby connecting existing and project residences to the existing sidewalk and the crosswalk at the school to cross El Centro Avenue. Finally, although not specifically addressed in the transportation study, the project site has two points of access with a sufficient separation to meet applicable Fire Code requirements. The internal street and connections would be built to meet the City's standards, and the plans would be reviewed by the Fire Department to ensure adequate emergency access. The proposed project would therefore be expected to have a less than significant impact on emergency response. No further response is required.

*Response to MERCIER-3*

The comment is noted.

**Construction Grading, Street Preparation, and Staging**

The MND outlines a comprehensive construction phasing plan that includes demolition, grading, utility installation, street construction, and building activities over an estimated 18- to 36-month period. Grading and excavation would follow recommendations from the geotechnical report, which includes

removal and recompaction of weak soils, use of engineered fill, and strict surface drainage controls to prevent runoff and structural damage.

To mitigate dust and particulate emissions, the proposed project would implement BMPs such as:

- Watering unpaved roads twice daily (estimated 55 percent reduction in $PM_{10}$ and $PM_{2.5}$).
- Stabilized site entrances, silt fencing, fiber rolls, and erosion control blankets as outlined in the Erosion and Sediment Control Plan.
- Use of Tier 4 diesel equipment and clean fleet standards to reduce air pollutant emissions.

Regarding vibration and noise, the MND and associated documents include analysis showing that construction noise levels may reach up to 87 dBA $L_{max}$ at the nearest residence, but these levels would be intermittent and limited to daytime hours in accordance with City standards. No pile driving is anticipated, and measures would be in place to reduce impacts to sensitive receptors.

**Street Reinforcement and Traffic Impacts**

While the MND and associated documents do not detail specific street reinforcement measures, they do include off-site improvements to El Centro Avenue and other adjacent streets and requires restoration of road surfaces to pre-project conditions following pipeline installation. The City would inspect compliance with these requirements, and the developer must pay a Street Improvement Fee to support broader infrastructure needs.

**Market Conditions and Infrastructure Readiness**

While CEQA does not require economic analysis, the proposed project is consistent with the City's 2020 General Plan and zoning designations and has been evaluated under CEQA Guidelines Section 15183 for consistency with previously certified EIRs. The infrastructure improvements, including water, sewer, storm drainage, and traffic mitigation, are designed to support the proposed development without overburdening existing systems. No further response is required.

**From:** Steve Miller
**To:** Mallen
**Subject:** Zinfandel Subdivision Project
**Date:** Thursday, September 4, 2025 9:02:11 AM

You don't often get email from napasteve@att.net. Learn why this is important

[EXTERNAL]

To Whom It May Concern:

Regarding this project on the Biale property on El Centro Avenue, I feel this will be great for Napa as it will provide more housing here, which is definitely needed. It is situated in a long time well established neighborhood and this is absolutely a 'no brainer' in regards to the inclusion of more housing. 1

Thank you for your time.

Cheers,
Steve Miller
707-337-6268

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***Steve Miller (MILLER)***

*Response to MILLER-1*

The comment is noted. Please refer to Master Response 1, Support for the Proposed Project, in Section 2, Master Responses, of this document. No further response is required.

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To: City of Napa Planning Commission

From: Chris & Stephanie O'Brien

Date: September 4, 2025

RE: Zinfandel Project / El Centro Ave

To the City of Napa Planning Commission,

We are writing in support of the proposed residential development on El Centro Avenue near Willow Elementary. While we are not residents of the immediate neighborhood, we have reviewed the publicly available documents—including the Environmental Impact Report—and believe this project reflects a thoughtful and responsible approach to infill development within the City of Napa.

The proposal aligns with the goals and policies outlined in the 2020 General Plan, particularly in its scale, density, and integration with surrounding residential patterns. It is not overly dense and appears consistent with other nearby housing projects, preserving the character and rhythm of the neighborhood.

Importantly, the project addresses longstanding infrastructure concerns in the area, including flooding mitigation and the patchwork condition of sidewalks and roadways. These improvements will benefit not only future residents but also the broader community. 1

After reviewing the EIR, we found no significant environmental concerns that would warrant delay or opposition. The planning and entitlement process has been transparent and thorough, and, the Biale Family has demonstrated a clear commitment to responsible land use and community stewardship.

We respectfully encourage the Commission to approve the project and allow it to move forward.

Sincerely,



Chris & Stephanie O'Brien

Sea Breeze Ct

Napa, CA

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***Chris and Stephanie O'Brien (O'BRIEN)***

*Response to O'BRIEN-1*

The comment is noted. Please refer to Master Response 1, Support for the Proposed Project, in Section 2, Master Responses, of this document. No further response is required.

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**From:** Lynn Pacho
**To:** mallen@cityofnapa.org
**Subject:** Zinfandel Subdivision Project
**Date:** Thursday, September 4, 2025 8:42:43 AM
**Attachments:** image001.png

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[EXTERNAL]

Hello,

I am writing this letter in support of the Zinfandel Subdivision Project.

My daughter lives in Napa and I have a vacation home there and visit frequently.

Napa is in desperate need of more homes, and I think this would be a great location to build.

Thank -you and have a great day,

1

**Lynn Pacho**
Payroll Manager
Harrington
14480 Yorba Avenue, Chino, CA, 91710
F: 909-393-5945 | O: 909-597-8641 | Cell 909 268 3123 | lpacho@hipco.com



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***Lynn Pacho (PACHO)***

*Response to PACHO-1*

The comment is noted. Please refer to Master Response 1, Support for the Proposed Project, in Section 2, Master Responses, of this document. No further response is required.

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**From:** TINA PERSAUD
**To:** Michael Allen
**Cc:** joankay.forseman@gmail.com
**Subject:** Zinfandel Subdivision - Project
**Date:** Monday, September 1, 2025 5:15:00 PM

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[EXTERNAL]

Dear Michael,

REF: Zinfandel Subdivision

I write to express my concern about the Zinfandel Subdivision. I do not believe the City has adequately examined the effects of this proposed project's impact on adjacent subdivsions from stormwater drainage and flooding.

I have been living at 3990 Glacier Drive for over 60 years and my backyard abuts the Napa creek. We have had many floods from the creek as development increases and there is less and less undeveloped land to provide drainage and underground recharge from stormwater. When we have heavy rain, we have floods and there have even been flood evacuations, which are unforgettable. I have seen floodwater from the creek coming at me at unbelievable speeds - which flooded my property, bringing with it furniture, a refrigerator and trees all floating with the flood water... Memories I do not like to bring alive again...I do not see any mitigation measures that address the impact of even more impervious surfaces and drainage. 1

The land for the Zinfandel Project is in a FEMA 100 year flood plain, and with climate change, we have been flooding more frequently than that. I do not see an adequate analysis of these impacts or any mitigation measure to address how the project will increase flooding from the creek.

There is a path along the creek that kids regularly use to get to Vintage and Jefferson. This development will increase the danger to kids using that path during the rainy season due to these flash floods.

I also do not think that the current analysis has adequately addressed the impact on beaver, bat and turtle habitat. A lot of wildlife use that area as a corridor to the creek, including endangered species. 2

In addition, during drought years, Napa does not have sufficient water to supply the current residents with water without major water use cutbacks. The Govenor's executive order has mandated a 30% cut back on certain cities and counties in the State. With climate change continuing, and the State's water supply diminishing, any future drought will make it impossible to supply adequate water to the current residents, let alone another 51 homes. Water is not a renewable resource these days. It appears to me that the City Council has not been taking that seriously. 3

As such, I am against the possibility of adding such a high density of houses on the

3
CONT

proposed property.

Sincerely, Katharina Persaud

***Katharina Persaud (PERSAUD)***

*Response to PERSAUD-1*

The comment is noted. Please refer to Master Response 7, Clarifying Information on the Stormwater Analysis, in Section 2, Master Responses, of this document. Master Response 7 provides clarifying information on the hydrology and water quality analysis for the proposed project, including a response to comments about potential flooding risk, stormwater runoff, and hydraulic modeling. No further response is required.

*Response to PERSAUD-2*

The comment is noted. Please refer to Master Response 5, Clarifying Information on the Biological Resources Analysis, in Section 2, Master Responses, of this document. Master Response 5 provides clarifying information on the biological resources analysis for the proposed project, including a response to comments about special-status species, tree removal and mitigation, and Salvador Channel. No further response is required.

*Response to PERSAUD-3*

The comment is noted. As detailed in Section 4.18, Utilities and Service Systems, of the Consistency Checklist, the proposed project would generate a water demand of 24,948 gallons per day (GPD), or approximately 27.95 acre-feet per year (AFY), which is approximately 0.2 percent of the total demand. In order to ensure the City would have sufficient water supplies available, the Prior Final EIR (Prior FEIR) states that the 2020 General Plan seeks to control urban development in the City's Water Service Area beyond the Rural Urban Limit (RUL). As such, infill development consistent with the uses planned for in the 2020 General Plan would ensure the City meets this goal. Development of uses consistent with those anticipated by the 2020 General Plan ensures that water supply projections detailed in the 2020 Urban Water Management Plan (UWMP) remain accurate. The proposed project is consistent with the project site's existing zoning and General land use designation; therefore, the demand was already evaluated in the 2020 General Plan Final EIR and is accounted for in the current UWMP. Thus, there is water supply available for the City and the water supply demanded by the proposed project can be accommodated by the existing supply.

The UWMP describes the City's plans to meet full service demands under all foreseeable hydrologic conditions, meeting a single dry year and multiple dry year eligibility. Table 22 of the Consistency Checklist shows the comparison between the supply and demand for projected years between 2025 and 2045 for different hydrologic scenarios. City demands are projected to be met with imported water and recycled water supplies with available State Water Project (SWP) surplus supplies. As described above, development consistent with the uses anticipated by the Prior FEIR ensures that the demand projections contained in the 2020 UWMP remain accurate. As the proposed project is consistent with the site's existing zoning and land use designation and, as such, consistent with the uses contemplated in the Prior FEIR, the proposed project's water demand would be accommodated in multiple dry year scenarios. No further response is required.

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**Laura Campion**

**Subject:** FW: Zinfandel Subdivision

**From:** judy Peterson <fey-paz@hotmail.com>
**Sent:** Monday, August 25, 2025 7:34 PM
**To:** mallen@cityofnapa.org
**Subject:** Zinfandel Subdivision

You don't often get email from fey-paz@hotmail.com. Learn why this is important

[EXTERNAL]

To Whom It May Concern

I am opposed to the addition of 51 homes. The impact this will have on an already overcrowded area presents a safety risk for children/families traveling to and from school. 1

Thank you,
Judy K. Peterson

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***Judy Peterson (PETERSON)***

*Response to PETERSON-1*

The comment is noted. Please refer to Master Response 9, Clarifying Information on the Transportation Analysis, in Section 2, Master Responses, of this document. Master Response 9 provides clarifying information on the transportation analysis for the proposed project, including a response to comments related to safety, emergency access, traffic congestion, and the adequacy of the transportation analysis. No further response is required.

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**From:** Julie Prince
**To:** mallen@cityofnapa.org
**Subject:** Zinfandel Subdivision on El Centro
**Date:** Sunday, August 24, 2025 6:51:48 PM

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[You don't often get email from jprince60@comcast.net. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification ]

[EXTERNAL]

Sent from my iPhone

I am writing to oppose the zinfandel subdivision on El Centro ave. There is too much traffic on the road presently, especially when Willow School is in session.
During the school year, there is non stop foot traffic and autos on El Centro. Usually from 7 am to 3 pm. Cars park on the roadway, often times parking in non parking ateas.
Making it a nightmare for the surrounding neighborhoods habitants to safely depart their homes via El Centro.

1

I Julie Ann Prince, 1641 Santiago Avenue Napa, Ca oppose the approval of this subdivision.
Thank you.

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***Ann Prince (PRINCE)***

*Response to PRINCE-1*

The comment is noted. Please refer to Master Response 9, Clarifying Information on the Transportation Analysis, in Section 2, Master Responses, of this document. Master Response 9 provides clarifying information on the transportation analysis for the proposed project, including a response to comments related to safety, emergency access, traffic congestion, and the adequacy of the transportation analysis. No further response is required.

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**From:** Penny Rister
**To:** mallen@cityofnapa.org
**Subject:** Zinfandel Subdivision
**Date:** Thursday, September 4, 2025 5:04:57 PM

You don't often get email from pennyrister@gmail.com. Learn why this is important

[EXTERNAL]

Michael Allen,

My name is Penny Rister and I live on Unwin Drive. The home I live in backs the proposed development on El Centro. I whole-heartedly approve of the El Centro Project. As I understand it, the mapping of 9.56 acres includes 48 single-family homes and 3 ADUs. This community is in dire need of additional housing, not solely appartment complexes and hotels. Much of the workforce in the valley has to commute which negatively impacts work performance and work flexibility to both employees AND employers.

As I understand it, the project has completed all necessary and required studies. I understand the concerns many residents have, but they are falling short. A traffic study was done to understand the impact on flow. An EIR looks to have been done as requested by the City of Napa. A flood impact study was done as well. Studies were also done regarding wildlife in the creek area. I can't imagine, the persons in charge of the project left something undone or unstudied. It concerns me that information is available to educate citizens, but has not been shared. 1

Change is HARD. We all know this. However, government can not styfle change, much needed building, and growth. Additionally, I can not even imagine how much money has been spent in the 8.5 years this project has been in the works. I strongly urge the Planning Comminssion approve this project.

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***Penny Rister (RISTER)***

*Response to RISTER-1*

The comment is noted. Please refer to Master Response 1, Support for the Proposed Project, in Section 2, Master Responses, of this document. No further response is required.

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## Laura Campion

**From:** Sharon Rogers <sharonrogers2@icloud.com>
**Sent:** Wednesday, September 3, 2025 4:55 PM
**To:** Michael Allen
**Subject:** Zinfandel Subdivision concern

[You don't often get email from sharonrogers2@icloud.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification ]

[EXTERNAL]

If a picture is worth a thousand words, let this be my essay on why the city of Napa needs to complete a full Environmental Impact report on the Zinfandel Subdivision being fast-tracked for approval.
I have lived on Moss Lane for over twenty-five years and in that time, have seen the creek rise to this level numerous times. This photo was taken from my front porch on Dec. 14, 2024. The water level rose higher after this picture was taken.

My understanding for the new housing development is that the developers are building on a FEMA 100 year flood plan and any new construction in this area could make the flooding worse. How can the city proceed to fast track an approval of this subdivision without conducting a full environmental report of how the building will affect all the homes in the neighborhood? Surely there must be due diligence completed before a Mitigated Negative Declaration under CEQA S15183 is granted. 1

We are a community that deserves a thoughtful environmental review and report.
Our homes depend on it.

Thank you,
Sharon Rogers



Sent from my iPad

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***Sharon Rogers (ROGERS)***

*Response to ROGERS-1*

The comment is noted. Please refer to Master Response 7, Clarifying Information on the Stormwater Analysis, in Section 2, Master Responses, of this document. Master Response 7 provides clarifying information on the hydrology and water quality analysis for the proposed project, including a response to comments about potential flooding risk, stormwater runoff, and hydraulic modeling. No further response is required.

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**From:** Susan R-H
**To:** mallen@cityofnapa.org
**Subject:** Zinfandel Subdivision (PL19-0016)
**Date:** Friday, September 5, 2025 4:06:49 PM

You don't often get email from quercusgiants@gmail.com. Learn why this is important

[EXTERNAL]

To whom it may concern within the
Planning Dept, and/or the City of Napa

I am concerned that the City of Napa has not had an updated Environmental Impact Report, in particular, for the North area of the City of Napa for far too many years (that is in particular, East of Hwy 29, West of Big Ranch Road, and North of Trancas).

The City has been aware for some 40 years that the Salvador Creek overflows its banks during heavy rain events.
And yet, the City of Napa continues to approve developments that divert rainwater runoff to the Salvador Creek.
This both prevents groundwater recharge and cumulatively, causes quicker more frequent flooding.
This flooding causes severe erosion to properties downstream of where properties are drained to Salvador Creek and emotional distress to those living on or near those flooding properties. 1

Essentially flooding occurs with the city's approval.

Another problem that the city of Napa has been aware of is traffic.
It was known at least 25 years ago that with the build out of the then approved density, we would be failing.
The density approved since has far exceeded what the studies were based on. 2

The city of Napa must have new studies of the environment prior to the approval of new development.

Respectfully,
Susan Rushing-Hart
73 Garfield Ln
Napa, Ca

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***Susan Rushing-Hart (RUSHING-HART)***

*Response to RUSHING-HART-1*

The comment is noted. Please refer to Master Response 7, Clarifying Information on the Stormwater Analysis, in Section 2, Master Responses, of this document. Master Response 7 provides clarifying information on the hydrology and water quality analysis for the proposed project, including a response to comments about potential flooding risk, stormwater runoff, and hydraulic modeling. No further response is required.

*Response to RUSHING-HART-2*

The comment is noted. Please refer to Master Response 3, General Opposition Comments Not Addressed in the Final MND, in Section 2, Master Responses, of this document. Master Response 3 provides a response to comments that express general opposition or disapproval of the proposed project.

Please also refer to Master Response 9, Clarifying Information on the Transportation Analysis, in Section 2, Master Responses, of this document. Master Response 9 provides clarifying information on the transportation analysis for the proposed project, including a response to comments related to safety, emergency access, traffic congestion, and the adequacy of the transportation analysis. No further response is required.

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**From:** Lansamb
**To:** mallen@cityofnapa.org
**Subject:** Zinfandel Subdivision Project
**Date:** Friday, September 5, 2025 4:05:07 PM

You don't often get email from lansamb@aol.com. Learn why this is important

[EXTERNAL]

Mr. Allen, My name is Lani Sambrotto. I own the property at 173 Moss Lane. I have concerns surrounding the proposed Zinfandel Project. If I am understanding the plans correctly, there is to be a raised elevation of the new homes to be built which will be higher than my property. I was hoping to see some sort of a cement curb and drainage for water runoff, but all I saw was a wood kickpanel on the base of the fence in the plans. If someone were to have a cement backyard there could be a potential problem of water flooding into my backyard. I trust that Planning and Development departments could check into this. If you need to contact me please feel free to do so. 1

Thank you, Lani Sambrotto 173 Moss Lane (707)695-5766

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***Lani Sambrotto (SAMBROTTO)***

*Response to SAMBROTTO-1*

The comment is noted. Please refer to Master Response 7, Clarifying Information on the Stormwater Analysis, in Section 2, Master Responses, of this document. Master Response 7 provides clarifying information on the hydrology and water quality analysis for the proposed project, including a response to comments about potential flooding risk, stormwater runoff, and hydraulic modeling. No further response is required.

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**From:** Steve Shown
**To:** Michael Allen
**Subject:** Zinfadel Subdivision
**Date:** Sunday, August 31, 2025 2:50:37 PM

You don't often get email from steveshown@gmail.com. Learn why this is important

[EXTERNAL]

Sir
I live at 1875 Unwin Dr, Napa, CA 94558, approximately 50-100' south of Salvador Channel, at the proposed site of this proposed development.
I fully support any effort to expand the housing stock in Napa. My only concern is that it does not add to the frequent flooding of my neighborhood. I am reassured that mitigations have already been made to address this issue. I did look with interest the comments by River Focus promised in Appendix B, but none were there.
Thank you for your time and attention to this matter, and for your service to Napa.

Steve "LB" Shown

1

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***Steve Shown (SHOWN)***

*Response to SHOWN-1*

The comment is noted. Please refer to Master Response 7, Clarifying Information on the Stormwater Analysis, in Section 2, Master Responses, of this document. Master Response 7 provides clarifying information on the hydrology and water quality analysis for the proposed project, including a response to comments about potential flooding risk, stormwater runoff, and hydraulic modeling.

The comments from River Focus Water Resources Consultants (River Focus) are contained within Appendix B of Appendix F.3, Hydraulic Analysis, of the Consistency Checklist. The comments from River Focus were identified with the numbers 1 through 10, followed by responses from O'Connor Environmental, Inc. No further response is required.

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**From:** Annabel Slovek
**To:** Michael Allen
**Subject:** Housing letter
**Date:** Thursday, August 28, 2025 10:06:57 AM

You don't often get email from annabel.slovek@gmail.com. Learn why this is important

[EXTERNAL]

**Annabel Slovek**
147 Almond Ave
Napa, CA, 94558
Annabel.slovek@gmail.com
623-628-3996

**August 28, 2025**

**City of Napa**
Community Development Department
1600 First Street
Napa, California 94559

Dear Members of the City of Napa Community Development Department,

I am writing to express my strong support for the Zinfandel Subdivision Project and the Draft Mitigated Negative Declaration (MND) that has been released for public review. As someone who is deeply invested in the long-term well-being and growth of our community, I believe this project represents a crucial step forward in addressing the ongoing housing shortage in Napa.

The development of 51 single-family homes and associated accessory dwelling units (ADUs) will provide much-needed housing opportunities in our city. The project's location, on 9.56 acres of land, is well-suited for this type of development, and I appreciate that it has been carefully planned in alignment with the city's General Plan and environmental considerations. It is encouraging to see that the potential environmental impacts have been thoroughly reviewed, and the project includes mitigating measures that will help minimize any negative effects on the surrounding area.

1

I also fully support the project's inclusion of junior ADUs and the potential for additional affordable housing options. With Napa's population steadily increasing and the demand for housing outpacing supply, this type of thoughtful, well-planned development is exactly what we need to ensure that our city remains vibrant, accessible, and sustainable for future generations.

Additionally, I appreciate the planned public review process and the opportunity for community members to voice their support or concerns. I encourage the City of Napa to move forward with the Zinfandel Subdivision Project and approve the Draft Mitigated Negative Declaration as soon as possible to allow for continued progress in providing housing solutions for Napa's residents.

Thank you for your attention to this important matter, and I look forward to the positive impact this project will bring to our community.

Sincerely,
Annabel Slovek

***Annabel Slovek (SLOVEK)***

*Response to SLOVEK-1*

The comment is noted. Please refer to Master Response 1, Support for the Proposed Project, in Section 2, Master Responses, of this document. No further response is required.

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**From:** Kelly Solomon
**To:** mallen@cityofnapa.org
**Subject:** Zinfandel Subdivision Project
**Date:** Wednesday, September 3, 2025 12:41:26 PM

You don't often get email from kelly@pvlacc.com. Learn why this is important

[EXTERNAL]

Hello-

I am writing in support of the Zinfandel Subdivision Project. I think it's a well thought out plan. The City of Napa needs more housing done by good community members that care about our city. I have been a member of the Napa community for 35 years and a participant in the Napa real estate community as a buyer & seller, therefore I speak from direct experience. 1

Thank you -
Kelly Solomon
707-310-0114

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***Kelly Solomon (SOLOMON)***

*Response to SOLOMON-1*

The comment is noted. Please refer to Master Response 1, Support for the Proposed Project, in Section 2, Master Responses, of this document. No further response is required.

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**From:** Clerk
**To:** Mayra Espinoza
**Subject:** FW: Zinfandel Project, El Centro/ Biali
**Date:** Tuesday, September 2, 2025 10:48:43 AM
**Attachments:** To the Planning Commission and the City Council of the city of Napa.docx

**From:** dastaats@earthlink.net <dastaats@earthlink.net>
**Sent:** Monday, September 1, 2025 5:36 PM
**To:** Clerk <clerk@cityofnapa.org>
**Subject:** Zinfandel Project, El Centro/ Biali

[EXTERNAL]

To the Planning commission, Staff and the City Council of the City of Napa,

I live off Big Ranch and Garfield Lane. I would like to be heard regarding the Zinfandel Project, El Centro/Biali. I have attached my letter regarding the Big Ranch Road Project. Almost all my objections to the Zinfandel Project are the same. They both involve Big Ranch and El Centro. The additional housing and traffic cannot be supported by the infrastructure on these 2 lane roads. They can't support the current traffic never mind the addition of thousands of cars. The roads are without bike lanes for the students at Vintage high School and they would ride a mere 2 feet from speeding cars. There are drainage ditches along each side of the roads, some over 4-foot drops immediately beside both lanes.

1

The traffic daily backs up from Trancas for a mile to Garfield at commute/school times. In addition, Garfield Little League has practices and 4-5 days a week 4-5 months of the year with hundreds of cars. In addition, there are agricultural vineyards and wineries with tractors, large farm equipment, and huge transport trucks during harvest. They also have many workers all year long and visitors to the wineries with their hundreds of vehicles. The construction would be impossible over the year or two of construction. The 2 lane roads cannot support thousands of more vehicles, and oversized heavy construction vehicles, constant trucks delivering heavy construction supplies, cement trucks, and all the workers vehicles. Never mind where they will park. The bike riders would be in peril trying to share the 2 lane roads with so many more cars and oversized vehicles.

1
CONT

I seriously object to the fact that the Agricultural Preserve established in 1968 to protect open space, agricultural lands, the environment, and the wine culture for current and future generations is being bypassed. I would also question the legality of ignoring the Preserve Protections to annex and rezone agricultural lands it was meant to protect. I also question the legality of using an outdated CEQA and stating that it is included in a previous FEIR therefore no further environmental review is required. I have discussed these same issues with the Protect Big Ranch neighbors, and I absolutely support legal action. I will be attending any hearings or meetings regarding these projects, as will many of my neighbors. A current CEQA needs to be completed, and legality needs to be seriously reconsidered. No development of the Zinfandel and Big Ranch Projects can be considered with the current state of these 2 lane roads. Serious infrastructure

2

improvement absolutely needs to be made before these projects can even be considered. Every member of the Planning Commission, Staff, and the City Council of the City of Napa need to drive these roads themselves before considering either of these projects.

2
CONT

Thank you,
Deborah A. Staats
124 Old Vine Way, Napa, CA 94558
9/1/25

To the Planning Commission, Staff and the City Council of the city of Napa,

I live off Big Ranch Road and Garfield Lane. I would like to be heard regarding the Big Ranch Road annexation of 53.5 acres of 66 acres into the city boundaries and the change of zoning from single family residential low density of 1 home per acre to medium density of 8-18 units per acre vs 1. That equates to over 1000 homes and 2000 plus vehicles if each has 2 cars. Not to mention some of the acres will have apartments and townhomes and/or condos with hundreds more vehicles. I am against these changes for many reasons. If the city can keep annexing and rezoning piece by piece county lands then the open space, agricultural land, the environment and the wine culture that supports this valley will be severely compromised. 3

The Agricultural Preserve was established in 1968 to protect open space, agricultural lands, the environment and the wine culture for current and future generations. No exceptions should be made because each annexation makes it easier to continue annexing. These changes seem contrary to protecting and preserving the viability of the Napa Valley and keeping it attractive to residents, visitors, and businesses. 4

I am against these changes because the infrastructure does not support the traffic that already exists without adding the change to medium density housing into the equation. Big Ranch Road is two lanes without bike lanes and drainage ditches immediately against the lanes for nearly all of it. The first few miles starting at Trancas have needed repaving for many years and have numerous potholes. The traffic from Vintage High School backs up from Trancas back to Garfield at the start and end of the school day and at the start to the end of work commute times. If housing density is increased and if Trower is extended to Big Ranch as planned many more students, faculty, parents, residents will be traveling Big Ranch.

Many students may want to bike to and from school, school activities, or events. There is no bike lane and drainage ditches immediately next to the 2 lanes of traffic, one each side. Student bike riders would ride 2 feet from speeding cars. In addition, since the east side of Big Ranch Road remains agricultural vineyards, there are agricultural tractors, large equipment and vineyard workers that use Big Ranch. There are also hundreds of tourists and visitors that use these two lane roads to frequent the numerous wineries located on Big Ranch Road. All of this makes Big Ranch Road unsuitable, and even a serious, unacceptable safety hazard for student bikers. It is also destructive to the businesses of the vineyards and wineries located on Big Ranch Road. 5

The actual construction of the medium density additional homes, townhomes/condos, apartments and the road extension may require a year or two to complete. This two lane road cannot support the heavy construction vehicles, constant trucks delivering heavy constructions supplies, cement trucks, and all the workers vehicles. Never mind where they will park. The bike riders would be in serious peril to try to share the road with these oversized vehicles.

In addition, there is the traffic from Garfield Little League Park to consider. Both before and after practices and games, sometimes 4-5 days a week and on weekends for the 4 months of the season every year, hundreds of cars travel Big Ranch Road onto Garfield, another two lane road through a quiet residential area to get to the park. There is inadequate parking at the park so the few residential streets surrounding the park are inundated with cars lining both sides of the streets. The residents have difficulty getting to our own homes and it interferes with our own parking needs, 6

including blocking driveways. We have spoken to the Little League many times regarding these issues. 6 CONT

All of these issues could not have been adequately analyzed with no further review required. This annexation and rezoning is a recent development. The prior CEQA and scope of the Napa 2040 General Plan Final Environmental Impact Report( General Plan FEIR) certified by the city council on September 20, 2022 could not have anticipated or conceived of all the conflicting influences in this particular case and this many years later.

All of these reasons are why this Annexation and Rezoning should be denied. It would create severe traffic congestion, severely increase road deterioration, create severe, unacceptable hazardous conditions for all bikers, interfere with the business of the vineyards and wineries, and create frustration for tourists, students, faculty, parents, residents, Little League activities, interfere with the agricultural activities and businesses of vineyards, wineries, and tourists visiting the many wineries on Big Ranch Road. No City Council member, Planning Commission, or Staff should recommend initiating this recommendation, or authorizing annexation of the property, or adopting any ordinance until they have driven down these two lane roads themselves including during back-up hours and Little League season. There also needs to be a current CEQA completed. It is inconceivable to me that staff are even making this recommendation or that the City Council is even considering putting this to a vote at this time without a current CEQA. 7

This Big Ranch Road Annexation and Rezoning needs to be reconsidered and further evaluated with the input of all those that would be effected. I am completely against this entire Annexation and Rezoning. I have discussed this with many neighbors and the consensus is unanimous that it be rejected. I plan on supporting legal action and attending any hearings or meetings regarding this issue, as will many of my neighbors.

Thank you,

Deborah A. Staats

124 Old Vine Way

Napa, Ca 94558

4/21/2025

707-690-9777

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***Deborah Staats (STAATS)***

*Response to STAATS-1*

The comment is noted. Please refer to Master Response 9, Clarifying Information on the Transportation Analysis, in Section 2, Master Responses, of this document. Master Response 9 provides clarifying information on the transportation analysis for the proposed project, including a response to comments related to safety, emergency access, traffic congestion, and the adequacy of the transportation analysis. No further response is required.

*Response to STAATS-2*

The comment is noted. As detailed in Section 4.2, Agriculture and Forestry Resources, of the Consistency Checklist, while the project site is designated as Prime Farmland and Farmland of Statewide Importance by the California Department of Conservation, there are no areas within the project site or the surrounding area that are under Williamson Act Contracts. Furthermore, the project site is not designated or zoned for agricultural uses. Therefore, the project site is not within an Agricultural Preserve that could be impacted by the proposed project. The commenter also attaches a comment letter related to a different project. To the extent that letter raises issues relevant to the proposed project, responses are provided below. No further response is required.

*Response to STAATS-3*

The comment is noted. Please refer to Master Response 9, Clarifying Information on the Transportation Analysis, in Section 2, Master Responses, of this document. Master Response 9 provides clarifying information on the transportation analysis for the proposed project, including a response to comments related to safety, emergency access, traffic congestion, and the adequacy of the transportation analysis. No further response is required.

*Response to STAATS-4*

The comment is noted. The project site is not in an Agricultural Preserve. Please refer to *Response to STAATS-2*. No further response is required.

*Response to STAATS-5*

The comment is noted. Please refer to Master Response 9, Clarifying Information on the Transportation Analysis, in Section 2, Master Responses, of this document. Master Response 9 provides clarifying information on the transportation analysis for the proposed project, including a response to comments related to safety, emergency access, traffic congestion, and the adequacy of the transportation analysis. Also, note that the proposed project does not include townhomes, condominiums, or apartments. No further response is required.

*Response to STAATS-6*

The comment is noted. Please refer to Master Response 2, Non-CEQA Issues Not Addressed in the Final MND, in Section 2, Master Responses, of this document. Master Response 2 provides additional information on the scope of CEQA and any non-CEQA issues are not further discussed in the Final MND. No further response is required.

*Response to STAATS-7*

The comment is noted. Please refer to Master Response 2, Non-CEQA Issues Not Addressed in the Final MND, in Section 2, Master Responses, of this document. Master Response 2 provides additional information on the scope of CEQA and any non-CEQA issues are not further discussed in the Final MND.

Please also refer to Master Response 3, General Opposition Comments Not Addressed in the Final MND, in Section 2, Master Responses, of this document. Master Response 3 provides a response to comments that express general opposition or disapproval of the proposed project. No further response is required.

**From:** Ryan Stewart
**To:** mallen@cityofnapa.org
**Cc:** planning@cityofnapa.org
**Subject:** Moss Lane Neighbors - Comments on Zinfandel Subdivision Draft MND
**Date:** Friday, September 5, 2025 8:17:53 AM
**Attachments:** Zinfandel_Subdivision_Handout.pdf
Zinfandel_Subdivision_Comment_Letter_Ryan_Stewart.pdf
**Importance:** High

Some people who received this message don't often get email from ryan_stewart@live.com. Learn why this is important

[EXTERNAL]

Dear Mr. Allen,

Please find attached a formal comment letter regarding the Draft Mitigated Negative Declaration for the Zinfandel Subdivision project (SCH 2025080319).

As outlined in the letter, we believe the project could have significant impacts in the areas of hydrology, hazardous materials, transportation, biological resources, noise, and public access. For this reason, we respectfully request that the City prepare a full Environmental Impact Report (EIR), or at minimum recirculates an expanded Initial Study/MND, before considering project approval.

For ease of reference, I have also included a one-page summary handout highlighting the key issues. 1

Please kindly confirm receipt of this submission, and ensure we are added to the mailing list for all future notices and hearings related to this project.

My family has been fortunate enough to live here on beautiful Moss Ln for nearly 10 years now. It's such a peaceful, quiet part of Napa with a very real sense of community. We fully recognize the city faces an important need for additional housing. However, new development must be undertaken with careful consideration to ensure long-term community benefits outweigh the risks.

Thank you very much for your consideration.

Sincerely,

Ryan Stewart – 166 Moss Ln

Ryan_stewart@live.com

707-536-6696

Additional Signees:

Lani Sambrotto – 173 Moss Ln

lansamb@aol.com

Guy Levin – 155 Moss Ln

guylevin@me.com

Gigi Dee – 149 Moss Ln

Yesitsgigi149@gmail.com

illiam Obana – 143 Moss Ln

wgobana@yahoo.com

Mariko Hachiya – 125 Moss Ln

Mariko.hachiya@gmail.com

Kimberlee Botta – 160 Moss Ln

mkbotta@att.net

# Zinfandel Subdivision – Key Reasons to Deny / Require EIR

## Flood & Stormwater Risks

Project requires a flood terrace and deletion of a lot to allow 100-year overland flow along Salvador Channel. Tentative map shows stormwater areas labeled “UNTREATED.” This is unacceptable directly adjacent to a creek.

## Soil Contamination & Public Health

DTSC flagged risks of pesticides, arsenic, and petroleum residues on historic vineyard land. Phase I ESA already recommends subsurface sampling. No Phase II has been done.

## Transportation & Safety

Traffic study is from 2019, before COVID, SB 743 VMT rules, and today’s school congestion. No current Safe Routes to School analysis for El Centro Ave. 2

## Loss of Public Access

City bike/ped plan envisions a Class I Salvador Creek Trail. Project instead makes creek-side terraces exclusive HOA space.

## Biological & Tree Loss

Removal of 29 trees and disturbance of riparian edge. Needs full surveys, higher tree replacement ratios, and riparian setback.

## Noise & Neighborhood Fit

Grading next to homes and schools; two-story massing along creek edge. Request stricter noise hours and step-down building heights.

**Conclusion:** The City cannot rely on a “Mitigated Negative Declaration” under CEQA §15183. This project’s peculiar flood, soil, traffic, and public access issues demand a full EIR.

Docusign Envelope ID: 1CCF50EA-78F2-4345-BB9C-7F8438618FB3



# Zinfandel Subdivision Draft MND (SCH 2025080319) – Request for EIR

Dear Mr. Allen,

On behalf of the undersigned we are writing today to formally file public comment regarding the Draft Mitigated Negative Declaration (MND) for the Zinfandel Subdivision (51 lots at 1583 & 1687 El Centro Avenue). We believe sufficient evidence exists to demonstrate that the project could result in significant impacts not adequately addressed by the 2020 General Plan EIR or the Initial Study.

**1. Hydrology and Water Quality**
The project requires extensive grading of flood terraces along Salvador Channel, deletion of lots for overland flow, and design of drainage areas labeled “UNTREATED” on the tentative map. These peculiar conditions pose flood and water-quality risks unique to this site and are not covered under CEQA §15183. We believe both a full hydrologic peer review and updated 100-year storm modeling are necessary. 3

**2. Hazardous Materials**
The Department of Toxic Substances Control (DTSC) identified risks from historic agricultural use, including organochlorine pesticides, arsenic, and petroleum hydrocarbons. The 2018 Phase I ESA flagged above-ground tanks and septic systems and recommended further investigation. Without a Phase II soil study and clean-fill protocol, the MND cannot ensure public safety. 4

**3. Transportation and VMT**
The only Traffic Study is from 2019, analyzing Level of Service at two intersections. CEQA’s shift to Vehicle Miles Traveled (VMT) in 2020, plus changed conditions near schools, demand a 2025 update with Safe Routes to School analysis. 5

**4. Public Access and Policy Consistency**
The City’s bicycle/pedestrian plan envisions a Class I trail along Salvador Creek. The project instead reserves the new creekside terraces as exclusive HOA space, undermining public policy. An easement for a multi-use trail must be required. 6

**5. Biological Resources**
The project proposes removal of 29 trees and adjacency to a sensitive riparian corridor. Biological surveys must be multi-seasonal, with stronger mitigation (higher tree replacement ratios, riparian setbacks, pre-construction surveys, agency permits). 7

**6. Noise and Community Compatibility**
Construction grading near existing homes and schools will generate noise exceeding acceptable limits. Conditions should prohibit Saturday heavy equipment, require temporary barriers, and mandate a complaint response protocol. The two-story massing along the creek edge also demands a privacy/shadow study and stepped-down building design.

Because the project poses potentially significant impacts in hydrology, hazards, transportation, biological resources, noise, and public access, reliance on CEQA §15183 is improper. A full Environmental Impact Report (EIR), or at minimum a recirculated expanded MND, is required. 8

We appreciate the department incorporating these comments into the evaluation of this project, and kindly request inclusion in all future hearings and related circulation.

Respectfully,

The Concerned Residents of Moss Ln

Ryan Stewart — Signed by: E9A8F56CBA214B1... — 9/2/2025

William Obana — DocuSigned by: 412B580A186B41C... — 9/2/2025

Mariko Hachiya — DocuSigned by: 11C12F90D0954CF... — 9/2/2025

Lani Sambrotto — Signed by: B2EEED5D478F4AF... — 9/2/2025

Kimberlee Botta — DocuSigned by: 6B5F53D7BD2D4C1... — 9/2/2025

Guy Levin — DocuSigned by: 4CFA99462BBD4BD... — 9/2/2025

Gigi Dee — Signed by: 8092087E96C540C... — 9/2/2025

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***Ryan Stewart, Lani Sambrotto, Guy Levin, Gigi Dee, William Obrana, Mariko Hachiya, and Kimberlee Botta (STEWART ET AL)***

*Response to STEWART ET AL-1*

The comment is noted. Please refer to Master Response 3, General Opposition Comments Not Addressed in the Final MND, in Section 2, Master Responses, of this document. Master Response 3 provides a response to comments that express general opposition or disapproval of the proposed project. Additionally, please refer to *Responses to STEWART ET AL-3* through *STEWART ET AL-8*. No further response is required.

*Response to STEWART ET AL-2*

The comment is noted. Please refer to *Responses to STEWART ET AL-3* through *STEWART ET AL-8*. No further response is required.

*Response to STEWART ET AL-3*

The comment is noted. Please refer to Master Response 7, Clarifying Information on the Stormwater Analysis, in Section 2, Master Responses, of this document. Master Response 7 provides clarifying information on the hydrology and water quality analysis for the proposed project, including a response to comments about potential flooding risk, stormwater runoff, and hydraulic modeling. No further response is required.

*Response to STEWART ET AL-4*

The comment is noted. Please refer to Master Response 6, Clarifying Information on the Hazardous Materials Analysis, in Section 2, Master Responses, of this document. Master Response 6 provides clarifying information on the hazardous materials analysis for the proposed project, including a response to comments about soil contamination and the Phase I ESA's findings. No further response is required.

*Response to STEWART ET AL-5*

The comment is noted. Please refer to Master Response 9, Clarifying Information on the Transportation Analysis, in Section 2, Master Responses, of this document. Master Response 9 provides clarifying information on the transportation analysis for the proposed project, including a response to comments related to safety, emergency access, traffic congestion, and the adequacy of the transportation analysis. No further response is required.

*Response to STEWART ET AL-6*

The comment is noted. Please refer to Master Response 9, Clarifying Information on the Transportation Analysis, in Section 2, Master Responses, of this document. Master Response 9 provides clarifying information on the transportation analysis for the proposed project, including a response to comments related to safety, emergency access, traffic congestion, and the adequacy of the transportation analysis. No further response is required.

*Response to STEWART ET AL-7*

The comment is noted. Please refer to Master Response 5, Clarifying Information on the Biological Resources Analysis, in Section 2, Master Responses, of this document. Master Response 5 provides

clarifying information on the biological resources analysis for the proposed project, including a response to comments about special-status species, tree removal and mitigation, and Salvador Channel. No further response is required.

*Response to STEWART ET AL-8*

The comment is noted. As detailed in Section 4.1, Aesthetics, of the Consistency Checklist, the proposed project is located in an urbanized area within the City and would be consistent with the land use and zoning designations of the project site with the use of Small Lot Development Standards allowed under the State Density Bonus Law. The proposed project would also be consistent with the required density for the RS 4 zoning district and would be required to comply with Napa Policy Resolution No. 27, which requires new developments to install lighting that limits light spillage into neighboring properties; to produce a final landscape and irrigation plan, designed and signed by a licensed landscape architect or landscape contractor, that specifies that all plant materials used are free of pests; and to notify the Agricultural Commissioner of any plant deliveries from outside the County. The proposed project would also be required to comply with the architectural requirements of the Napa Residential Design Guidelines and the General Plan. The Napa Residential Design Guidelines impose requirements for new developments in residential neighborhoods, including site plan requirements, grading and drainage control measures, landscaping standards, fencing and screening requirements, driveway and parking standards, and utility requirements. Therefore, the proposed project would not conflict with applicable zoning or other regulations governing scenic quality and impacts would be less than significant.

Please also refer to Master Response 2, Non-CEQA Issues Not Addressed in the Final MND, in Section 2, Master Responses, of this document. Master Response 2 provides additional information on the scope of CEQA and any non-CEQA issues are not further discussed in the Final MND.

Additionally, please refer to Master Response 8, Clarifying Information on the Noise Analysis, in Section 2, Master Responses, of this document. Master Response 8 provides clarifying information on the noise analysis for the proposed project, including a response to comments about potential noise and vibration impacts associated with the construction of the proposed project. No further response is required.

**From:** Mike Taylor
**To:** mallen@cityofnapa.org
**Subject:** Zinfandel Subdivision Project
**Date:** Thursday, September 4, 2025 8:09:43 PM

You don't often get email from mikertaylor21@gmail.com. Learn why this is important

[EXTERNAL]

I am writing in support of the Zinfandel Subdivision Project. I have lived in Napa my whole life of 57 years and I have owned multiple properties. Napa needs more homes and this project does not affect any Ag Preserve. It is a positive and a win for the city. 1

Mike Taylor

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***Mike Taylor (TAYLOR)***

*Response to TAYLOR-1*

The comment is noted. Please refer to Master Response 1, Support for the Proposed Project, in Section 2, Master Responses, of this document. No further response is required.

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**From:** Becky Tschauder
**To:** mallen@cityofnapa.org
**Subject:** El Centro Building Concerns
**Date:** Tuesday, September 2, 2025 4:10:28 PM

You don't often get email from blt588@yahoo.com. Learn why this is important

[EXTERNAL]

Hello Michael,

I hope this email finds you well. I live in the vicinity of the proposed subdivision on the Biale El Centro vineyard. I propose that a full EIR is performed to fully assess the risks of this project. My two main concerns are flooding risk to our neighboring street, Valencia St and the traffic impact. During the heavy rain storms, our road always floods as the storm drains back up and the flow is cut off into Salvador Creek. As a result, we are required to carry expensive flood insurance for our house. To have 50+ more houses use this creek for drainage and run off should require a full EIR report. I would not want to have to continue to pay for flood insurance if this housing is approved. We are currently working on a way to get out of being in a flood zone, but I would worry what the impact of this development would have as it could make the flooding worse, thus, needing to keep the expensive insurance. 1

Also, with the school present on El Centro, there should be a current traffic report performed and not use one that is 5+ years old. At certain times of the day, we are basically blocked in our neighborhood between Trower/Vintage High traffic and the El Centro School traffic. 2

Thank you for your time,
Rebecca

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***Rebecca Tschauder (TSCHAUDER)***

*Response to TSCHAUDER-1*

The comment is noted. Please refer to Master Response 2, Non-CEQA Issues Not Addressed in the Final MND, in Section 2, Master Responses, of this document. Master Response 2 provides additional information on the scope of CEQA and any non-CEQA issues not further discussed in the Final MND.

Additionally, please refer to Master Response 7, Clarifying Information on the Stormwater Analysis, in Section 2, Master Responses, of this document. Master Response 7 provides clarifying information on the hydrology and water quality analysis for the proposed project, including a response to comments about potential flooding risk, stormwater runoff, and hydraulic modeling. No further response is required.

*Response to TSCHAUDER-2*

The comment is noted. Please refer to Master Response 9, Clarifying Information on the Transportation Analysis, in Section 2, Master Responses, of this document. Master Response 9 provides clarifying information on the transportation analysis for the proposed project, including a response to comments related to safety, emergency access, traffic congestion, and the adequacy of the transportation analysis. No further response is required.

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**From:** Phoebe
**To:** Michael Allen
**Subject:** Public comment about Zinfandel project 716
**Date:** Wednesday, September 3, 2025 7:12:20 PM
**Attachments:** IMG_8198.MOV

You don't often get email from pullberg@gmail.com. Learn why this is important

[EXTERNAL]

Hello Mr. Allen,
I appreciate the opportunity to review the planned project across the creek from my house at 1901 Unwin Drive.
I've reviewed the hydrology section with particular interest, since this section of my neighborhood, one block from Salvador Channel, regularly floods, even at times when there is no large threat of flooding. I've attached a short video from the floods in Mid December last year. That flooding measured 8" at the base of my driveway to the street. We had flooding on two different occasions last year.

That brings me to my first comment and question: Are you or other departments in the city aware of this situation and able to shed light on why it is happening in this isolated area?

What I am failing to understand in the materials provided, or in the meeting that I attended last winter about this project, is how the additional runoff into Salvador Creek will be managed so that the negative impact we see in my neighborhood isn't intensified. There is vague language about mitigation, 1

*"In order to reduce the flood hazard to the development and other neighbors downstream, vegetation and native trees will be planted along this terrace to help prevent the land from eroding downstream. Additional channel restoration mitigation measures and plans approved by the City will be implemented to help reduce potential flood hazard."*

Second Comment: Please detail the additional channel restoration mitigation measures.

Thank you. I look forward to hearing from you and will be sure to share your information with my concerned neighbors.
Phoebe Ullberg
1901 Unwin Drive, Napa CA


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***Phoebe Ullberg (ULLBERG)***

*Response to ULLBERG-1*

The comment is noted. Please refer to Master Response 7, Clarifying Information on the Stormwater Analysis, in Section 2, Master Responses, of this document. Master Response 7 provides clarifying information on the hydrology and water quality analysis for the proposed project, including a response to comments about potential flooding risk, stormwater runoff, and hydraulic modeling. No further response is required.

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**Sandy Killian Valente**
3413 Deerfield Court
Napa, CA 94558
sandrafkillian@gmail.com
707-337-9654

**September 3, 2025**

City of Napa Community Development Department
1600 First Street
Napa, CA 94559

**RE: Support for Proposed Development at 1583 and 1687 El Centro Avenue (APNs 038-361-009 and 038-361-010)**

Dear Community Development Department,

I am writing to express my strong support for the proposed 9.56-acre residential development at 1583 and 1687 El Centro Avenue, Napa, California. As a resident who cares deeply about the future of our community, I believe this project represents a much-needed step forward for the City of Napa.

Napa is currently experiencing a housing shortage, and this project directly addresses that issue by increasing the supply of residential units. Importantly, the proposed development includes Section 8 and other low-income housing options, which will provide essential access to housing for individuals and families who are priced out of the market. These kinds of inclusive housing initiatives are critical to ensuring Napa remains a diverse and vibrant community and not just a resort town full of 2nd homes.

1

Additionally, the site's proximity to four schools makes it an ideal location for family housing, and NVUSD needs students as our school enrollment is down. Locating homes near schools supports walkability, reduces traffic congestion, and creates a stronger sense of neighborhood cohesion.

I would also like to acknowledge the Biale Family, long-time stewards of the property in question. The Biales have been a part of the Napa Valley community for decades and have demonstrated a consistent commitment to responsible land use and civic engagement. I have complete confidence in their ability to guide this project with integrity and in the best interest of the city.

In summary, I believe this development represents a responsible and forward-looking response to Napa's housing challenges. I urge the City of Napa Community Development Department to approve this project and allow it to move forward for the benefit of our entire community.

Thank you for your time and consideration.

Sincerely,

Sandy Killian Valente

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***Sandy Valente (VALENTE)***

*Response to VALENTE-1*

The comment is noted. Please refer to Master Response 1, Support for the Proposed Project, in Section 2, Master Responses, of this document. No further response is required.

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# Public Comment and Letter of Opposition

## Zinfandel Subdivision Project – PL19-0016

Submitted by: Susan Vaziri
1908 Valencia Street
Napa, CA 94558

# Introduction

I am writing to provide public comment and to express my strong opposition to the proposed Zinfandel Subdivision Project (PL19-0016) and its associated Draft Mitigated Negative Declaration (MND). I am a long-time Napa resident and the owner of 1908 Valencia Street. My home directly borders Salvador Creek, which separates our established neighborhood from the land proposed for this development. As someone whose backyard faces this delicate riparian corridor, I am deeply concerned about the environmental, ecological, health, and community impacts of this project. For the reasons below, I respectfully request that the City reject the Mitigated Negative Declaration and instead prepare a full Environmental Impact Report (EIR).

# Irreparable Environmental Impact to Salvador Creek Ecosystem

Salvador Creek is not simply a drainage channel — it is a living, sensitive ecosystem. Through years of observation and trail camera monitoring, I have documented the presence of beavers, river otters, mink, kingfishers, great blue herons, egrets, chinook salmon, and birds of prey. In addition, indigenous frogs and native fish species depend on these creeks as some of the last viable habitats where they can survive and reproduce. Agricultural expansion and urban development have eliminated many other suitable areas in Napa Valley, making the Salvador Creek corridor uniquely critical for their continued existence. The beavers in particular have sustained a wetland-like habitat critical for biodiversity. In addition, I have personally observed Hooded Mergansers and Common Mergansers along Salvador Creek. These migratory ducks are rarely seen in Napa and rely on intact riparian corridors as stopover habitat. Their documented presence underscores the regional ecological significance of this site. Habitat disruption from grading, tree removal, noise, and increased human activity would directly harm these sensitive species. 1

# Flooding and Inadequate Drainage Solutions

Salvador Creek already floods annually, particularly near Lassen Street, under current conditions. The streets and creek flood every year, and multiple neighbors can provide both photographic and video evidence of these recurring flood events, underscoring the severity of the hazard. The proposed subdivision, which replaces vineyards and open soil with rooftops, pavement, and hardscape, will significantly worsen runoff and downstream flooding. The drainage designs offered in the MND are insufficient and rely on assumptions that do not reflect actual flood behavior. A full hydrological analysis under an EIR is necessary to protect downstream residents from increased flood hazards. 2

# Public Health & Soil Contamination Concerns

The California Department of Toxic Substances Control (DTSC) has raised critical concerns regarding the site's potential contamination and demolition hazards: agricultural residues such as legacy pesticides (DDT, toxaphene, dieldrin, arsenic); demolition materials including asbestos, lead-based 3

paint, mercury, or PCBs; and risks from imported fill that must be tested. These risks must be fully studied before approval. Proceeding under an MND without comprehensive testing exposes both future residents and the surrounding community to long-term health hazards. 3 CONT

## Loss of Privacy and Quality of Life

This will be a high density/zero lot line development, which does not match the existing neighborhood. The proposed two-story homes will overlook my backyard and rear-facing windows, replacing open views of the creek and wildlife with direct sightlines into my private outdoor space. This is a permanent loss of privacy and quality of life for myself and other adjacent homeowners, and it dramatically alters the established character of our neighborhood. 4

## Loss of Open Space, Trees, and Napa's Rural Character

The proposed demolition of the historic vineyard and removal of 29 mature trees represent a permanent loss of Napa's open-space heritage. Once removed, this canopy and rural landscape cannot be replaced. The project prioritizes density over heritage, eroding the small-town character and ecological integrity that have long defined Napa. Alternatives — such as preserving the property as open space or limited agricultural use — must be considered. 5

## Misuse of CEQA Section 15183 and the Consistency Checklist

The City's Draft MND relies on CEQA Guidelines Section 15183 and a Consistency Checklist, claiming the project's impacts are already analyzed under the 2020 General Plan EIR. This reliance is misplaced. Unique biological resources, localized flooding hazards, contamination risks, removal of 29 mature trees, and added density from ADUs/JADUs all present site-specific or new impacts not covered by the 2020 General Plan EIR. Under CEQA, any one of these factors alone requires a project-specific EIR. By ignoring them, the City is improperly attempting to shortcut environmental review. 6

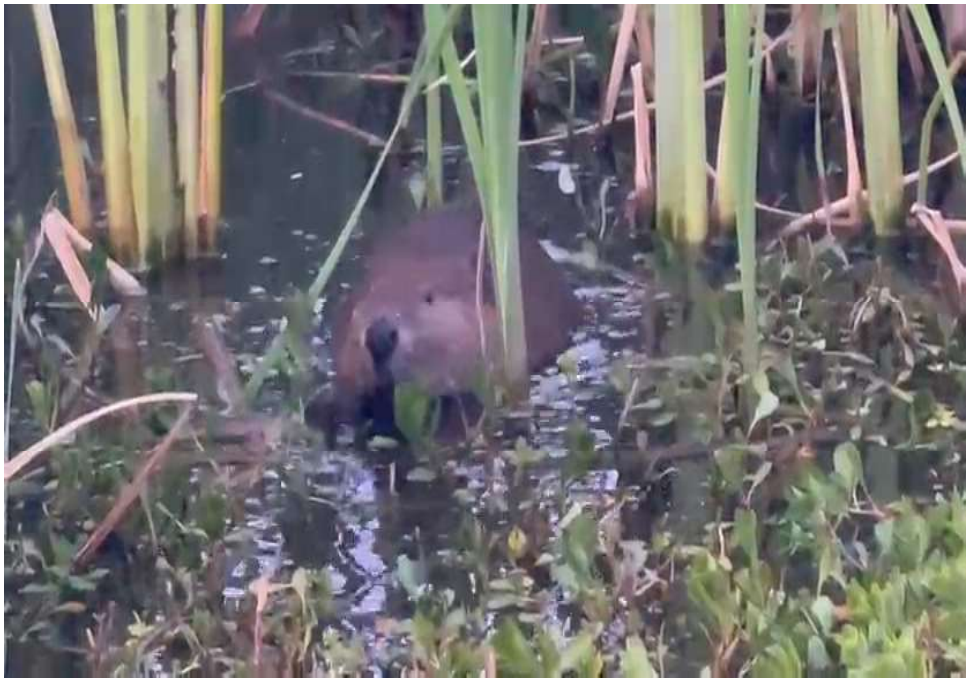
## Legal Insufficiency of a Mitigated Negative Declaration

Even aside from the Section 15183 concerns, the Draft MND fails to account for the significant environmental, health, and community impacts described above. Approving the project under an MND would violate CEQA and expose the City to legal challenge.

## Conclusion

For all the reasons outlined, I respectfully request that the City reject the Draft Mitigated Negative Declaration and require a full Environmental Impact Report for the Zinfandel Subdivision Project (PL19-0016). The environmental costs are too high, the flooding risks too great, the health hazards too serious, and the community impacts too severe to proceed without thorough review. Thank you for the opportunity to comment. This letter is submitted for the record during the CEQA public review period ending September 5, 2025, by 5:00 PM. 7

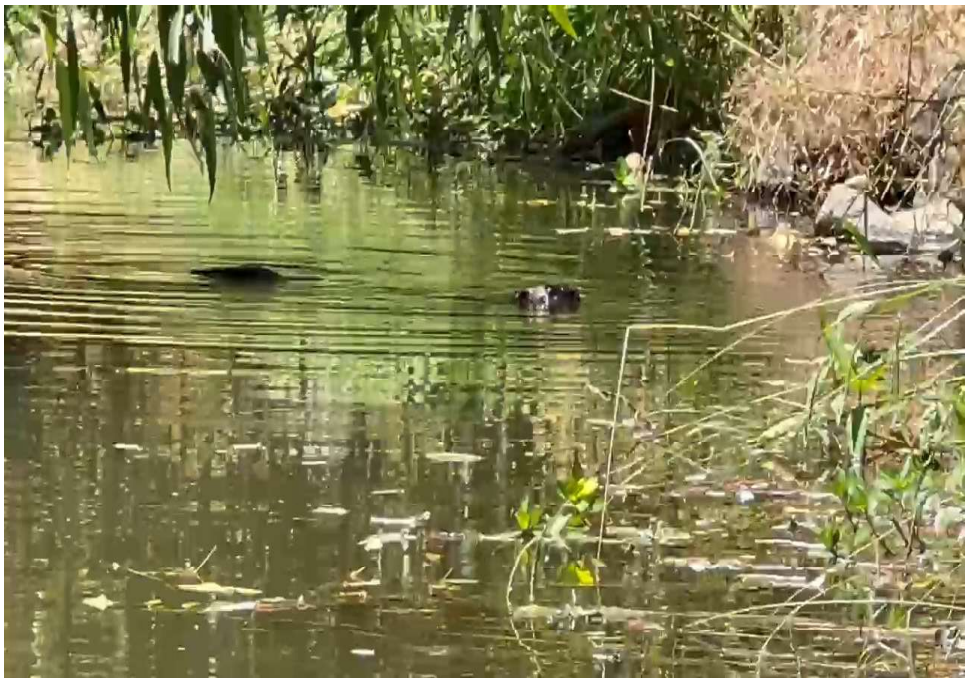
# Appendix A: Wildlife Photographic Evidence



Adult Beaver - Seen Summer 2021 - Present, Salvador Creek, Napa, CA



Baby Beaver - November 26, 2024, Salvador Creek, Napa, CA



River Otter - July 7, 2025, Salvador Creek, Napa, CA



River Otter - January 2, 2025. Seen Summer 2021 - Present, Salvador Creek, Napa, CA




Green Heron, July 9, 2025, Salvador Creek, Napa, CA



Hooded Merganser, Male - March 13, 2025, Salvador Creek, Napa, CA



Hooded Merganser Pair - February 21, 2025, Salvador Creek, Napa, CA



Adult Mink - Spotted June 2025 - Present, Salvador Creek, Napa, CA




Mink Kits Playing - Still from Trail Cam, July 19, 2025, Salvador Creek, Napa, CA




Mink Kits Playing - Still from Trail Cam July 19, 2025, Salvador Creek, Napa, CA



Belted Kingfisher - June 25, 2025, Salvador Creek, Napa, CA, Noted from Summer 2020 to Present



Kingfisher in flight, June 25, 2025, Salvador Creek, Napa, CA



Chinook Salmon - November 26, 2024, Salvador Creek, Napa, CA



Chinook Salmon - November 26, 2024, Salvador Creek, Napa, CA



Red Shoulder Hawk - Noted From Summer 2020 to Present, Salvador Creek, Napa, CA



Blue Heron - December 11, 2024, Salvador Creek, Napa, CA



Great Egret - December 12, 2023, Salvador Creek, Napa, CA

# Appendix B: Flooding Photographic Evidence



Flooding at Valencia Street - February 4, 2025, Napa, CA



Flooding at Valencia Street - February 4, 2025, Napa, CA



Flooding at Valencia Street - February 4, 2025, Napa, CA



Salvador Creek Flooding — Overflow into vineyard area - February 4, 2025, Napa, CA

*Note: These still images are representative frames from trail camera and personal video footage. Full-length video files are available to the City of Napa Planning Commission upon request.*

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***Susan Vaziri (VAZIRI 1)***

*Response to VAZIRI 1-1*

The comment is noted. Please refer to Master Response 5, Clarifying Information on the Biological Resources Analysis, in Section 2, Master Responses, of this document. Master Response 5 provides clarifying information on the biological resources analysis for the proposed project, including a response to comments about special-status species, tree removal and mitigation, and Salvador Channel. No further response is required.

*Response to VAZIRI 1-2*

The comment is noted. Please refer to Master Response 7, Clarifying Information on the Stormwater Analysis, in Section 2, Master Responses, of this document. Master Response 7 provides clarifying information on the hydrology and water quality analysis for the proposed project, including a response to comments about potential flooding risk, stormwater runoff, and hydraulic modeling. No further response is required.

*Response to VAZIRI 1-3*

The comment is noted. Please refer to Master Response 6, Clarifying Information on the Hazardous Materials Analysis, in Section 2, Master Responses, of this document. Master Response 6 provides clarifying information on the hazardous materials analysis for the proposed project, including a response to comments about soil contamination and the Phase I ESA's findings. No further response is required.

*Response to VAZIRI 1-4*

The comment is noted. As detailed in Section 4.1, Aesthetics, of the Consistency Checklist, the proposed project is located in an urbanized area within the City and would be consistent with the land use and zoning designations of the project site with the use of Small Lot Development Standards allowed under the State Density Bonus Law. The proposed project would also be consistent with the required density for the RS 4 zoning district and would be required to comply with Napa Policy Resolution No. 27, which requires new developments to install lighting that limits light spillage into neighboring properties; to produce a final landscape and irrigation plan, designed and signed by a licensed landscape architect or landscape contractor, that specifies that all plant materials used are free of pests; and to notify the Agricultural Commissioner of any plant deliveries from outside the County. The proposed project would also be required to comply with the architectural requirements of the Napa Residential Design Guidelines and the General Plan. The Napa Residential Design Guidelines impose requirements for new developments in residential neighborhoods, including site plan requirements, grading and drainage control measures, landscaping standards, fencing and screening requirements, driveway and parking standards, and utility requirements. Therefore, the proposed project would not conflict with applicable zoning or other regulations governing scenic quality and impacts would be less than significant.

Please also refer to Master Response 2, Non-CEQA Issues Not Addressed in the Final MND, in Section 2, Master Responses, of this document. Master Response 2 provides additional information

on the scope of CEQA and any non-CEQA issues are not further discussed in the Final MND. No further response is required.

*Response to VAZIRI 1-5*

The comment is noted. The project site has a land use designation of Single-Family Residential (SFR-20) in the operative 2020 General Plan and is zoned Single-Family Residential with a minimum lot size of 4,000 square feet (RS 4). As such, the project site has been planned for residential uses since 1996. Therefore, no alternative uses for the project site, such as preserving the property as open space or limited agricultural use, were considered (or are required to be considered) as part of the CEQA evaluation.

Furthermore, as detailed in *Response to VAZIRI 1-4*, the proposed project would not result in significant impacts related to aesthetics as evaluated in the Consistency Checklist. No further response is required.

*Response to VAZIRI 1-6*

The comment is noted. The City's use of an MND pursuant to CEQA Guidelines Section 15183 is both appropriate and legally required for this project. Section 15183 "mandates" streamlined environmental review for projects, like this one, that are consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was previously certified. Under Section 15183, further environmental review is limited to effects that are peculiar to the project or parcel or that were not previously analyzed in the prior EIR.

To address the extent to which the 2020 General Plan EIR fully evaluated the proposed project, the City prepared a Consistency Checklist to determine whether there were any project-specific significant effects peculiar to the proposed project or its site as required by Section 15183. An MND was then prepared to address specific topics that were not fully evaluated in the EIR. Accordingly, the totality of the evaluation, including both the Consistency Checklist and the MND, found that all potentially significant impacts, including those related to biological resources, localized flooding, contamination risks, tree removal, and increased density from ADUs/junior ADUs, can be mitigated to a less than significant level through the mitigation measures identified in the MND. Where site-specific impacts were identified, such as removal of mature trees and riparian habitat, the MND includes robust mitigation measures and monitoring requirements to ensure compliance with CEQA.

CEQA does not require preparation of a project-specific EIR unless there is substantial evidence that the project may result in significant impacts that cannot be mitigated. In this case, the record demonstrates that all impacts can be mitigated, and the streamlined review under Section 15183 is not a discretionary shortcut but a legal mandate. The City has not ignored site-specific impacts; rather, it has addressed them through the required analysis and mitigation in the MND. No further response is required.

*Response to VAZIRI 1-7*

The comment is noted. The comment does not identify any specific evidence or facts in support of evidence that the proposed project would have a potentially significant impact on the environment

that is not mitigated to below a level of significance, nor does the comment dispute that Section 15183 applies to the proposed project. Section 15183(c) specifies that if an impact is not peculiar to the parcel or to the proposed project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards, then an additional EIR need not be prepared for that project solely on the basis of that impact. Therefore, it follows that environmental review evaluating the limited effects identified under Section 15183 may be properly addressed in an MND. No further response is required.

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**Date:** September 2, 2025

**Via Hand Delivery**

**To:**
Michael Allen, Acting Planning Manager
Community Development Department – Planning Division
City of Napa

**Re:** Zinfandel Subdivision Project (PL19-0016) — Public Comment Letter & Request for Distribution to Planning Commission

Dear Mr. Allen,

Since I did not receive the requested confirmation reply to my email, I am hand-delivering a printed copy of my **Public Comment and Letter of Opposition** regarding the **Zinfandel Subdivision Project (PL19-0016)**, including **Appendix A: Wildlife Photographic Evidence** and **Appendix B: Flooding Photographic Evidence**.

Please (1) **date-stamp "Received"** on this cover letter for the administrative record, and (2) **ensure that every Planning Commissioner receives a complete copy** for review **in advance of the October 16, 2025 Planning Commission hearing**. I also request that this submission be included in the **official administrative record** for PL19-0016 and made available to the public as part of the agenda materials. 1

If any additional formats or materials would be helpful (e.g., digital originals of photos or supporting video files), I can provide them promptly in the manner you prefer.

Thank you for your attention and assistance.

Sincerely,

**Susan Vaziri**
1908 Valencia Street
Napa, CA 94558
(818) 730-2372
vaziri.susan@gmail.com

**Enclosure:** Original Email, Public Comment and Letter of Opposition re: Zinfandel Subdivision (PL19-0016), with Appendices A & B

ORIGINAL EMAIL SENT August 28, 2025

Dear Mr. Allen,

Please accept the attached Public Comment and Letter of Opposition regarding the Zinfandel Subdivision Project (PL19-0016) and its Draft Mitigated Negative Declaration. I am submitting this during the 30-day public review period (August 7, 2025–September 5, 2025, by 5:00 p.m.), as noticed by the City of Napa Community Development Department.

The attachment includes:

My letter requesting that the City prepare a full Environmental Impact Report (EIR) given site-specific concerns (biological resources, flooding/runoff, mature tree removal, and potential contamination).

Appendix A: Wildlife Photographic Evidence

Appendix B: Flooding Photographic Evidence documenting recurrent street and creek flooding.

2

I respectfully request that this submission be placed into the administrative record for PL19-0016 and be provided to the Planning Commission ahead of the tentatively scheduled October 16, 2025 hearing at 5:30 p.m.

If helpful, I can also provide original trail-camera video files supporting the wildlife stills. Please let me know your preferred method for receiving larger files (secure upload link or file-transfer protocol).

Kindly confirm receipt of this email and attachment.

Thank you for your attention.

Sincerely,

Susan Vaziri
1908 Valencia Street
Napa, CA 94558
vaziri.susan@gmail.com

# Public Comment and Letter of Opposition

## Zinfandel Subdivision Project – PL19-0016

Submitted by: Susan Vaziri
1908 Valencia Street
Napa, CA 94558

# Introduction

I am writing to provide public comment and to express my strong opposition to the proposed Zinfandel Subdivision Project (PL19-0016) and its associated Draft Mitigated Negative Declaration (MND). I am a long-time Napa resident and the owner of 1908 Valencia Street. My home directly borders Salvador Creek, which separates our established neighborhood from the land proposed for this development. As someone whose backyard faces this delicate riparian corridor, I am deeply concerned about the environmental, ecological, health, and community impacts of this project. For the reasons below, I respectfully request that the City reject the Mitigated Negative Declaration and instead prepare a full Environmental Impact Report (EIR).

# Irreparable Environmental Impact to Salvador Creek Ecosystem

Salvador Creek is not simply a drainage channel — it is a living, sensitive ecosystem. Through years of observation and trail camera monitoring, I have documented the presence of beavers, river otters, mink, kingfishers, great blue herons, egrets, chinook salmon, and birds of prey. In addition, indigenous frogs and native fish species depend on these creeks as some of the last viable habitats where they can survive and reproduce. Agricultural expansion and urban development have eliminated many other suitable areas in Napa Valley, making the Salvador Creek corridor uniquely critical for their continued existence. The beavers in particular have sustained a wetland-like habitat critical for biodiversity. In addition, I have personally observed Hooded Mergansers and Common Mergansers along Salvador Creek. These migratory ducks are rarely seen in Napa and rely on intact riparian corridors as stopover habitat. Their documented presence underscores the regional ecological significance of this site. Habitat disruption from grading, tree removal, noise, and increased human activity would directly harm these sensitive species.

2
CONT

# Flooding and Inadequate Drainage Solutions

Salvador Creek already floods annually, particularly near Lassen Street, under current conditions. The streets and creek flood every year, and multiple neighbors can provide both photographic and video evidence of these recurring flood events, underscoring the severity of the hazard. The proposed subdivision, which replaces vineyards and open soil with rooftops, pavement, and hardscape, will significantly worsen runoff and downstream flooding. The drainage designs offered in the MND are insufficient and rely on assumptions that do not reflect actual flood behavior. A full hydrological analysis under an EIR is necessary to protect downstream residents from increased flood hazards.

# Public Health & Soil Contamination Concerns

The California Department of Toxic Substances Control (DTSC) has raised critical concerns regarding the site's potential contamination and demolition hazards: agricultural residues such as legacy pesticides (DDT, toxaphene, dieldrin, arsenic); demolition materials including asbestos, lead-based

paint, mercury, or PCBs; and risks from imported fill that must be tested. These risks must be fully studied before approval. Proceeding under an MND without comprehensive testing exposes both future residents and the surrounding community to long-term health hazards.

## Loss of Privacy and Quality of Life

This will be a high density/zero lot line development, which does not match the existing neighborhood. The proposed two-story homes will overlook my backyard and rear-facing windows, replacing open views of the creek and wildlife with direct sightlines into my private outdoor space. This is a permanent loss of privacy and quality of life for myself and other adjacent homeowners, and it dramatically alters the established character of our neighborhood.

## Loss of Open Space, Trees, and Napa's Rural Character

The proposed demolition of the historic vineyard and removal of 29 mature trees represent a permanent loss of Napa's open-space heritage. Once removed, this canopy and rural landscape cannot be replaced. The project prioritizes density over heritage, eroding the small-town character and ecological integrity that have long defined Napa. Alternatives — such as preserving the property as open space or limited agricultural use — must be considered.

## Misuse of CEQA Section 15183 and the Consistency Checklist

The City's Draft MND relies on CEQA Guidelines Section 15183 and a Consistency Checklist, claiming the project's impacts are already analyzed under the 2020 General Plan EIR. This reliance is misplaced. Unique biological resources, localized flooding hazards, contamination risks, removal of 29 mature trees, and added density from ADUs/JADUs all present site-specific or new impacts not covered by the 2020 General Plan EIR. Under CEQA, any one of these factors alone requires a project-specific EIR. By ignoring them, the City is improperly attempting to shortcut environmental review.

2
CONT

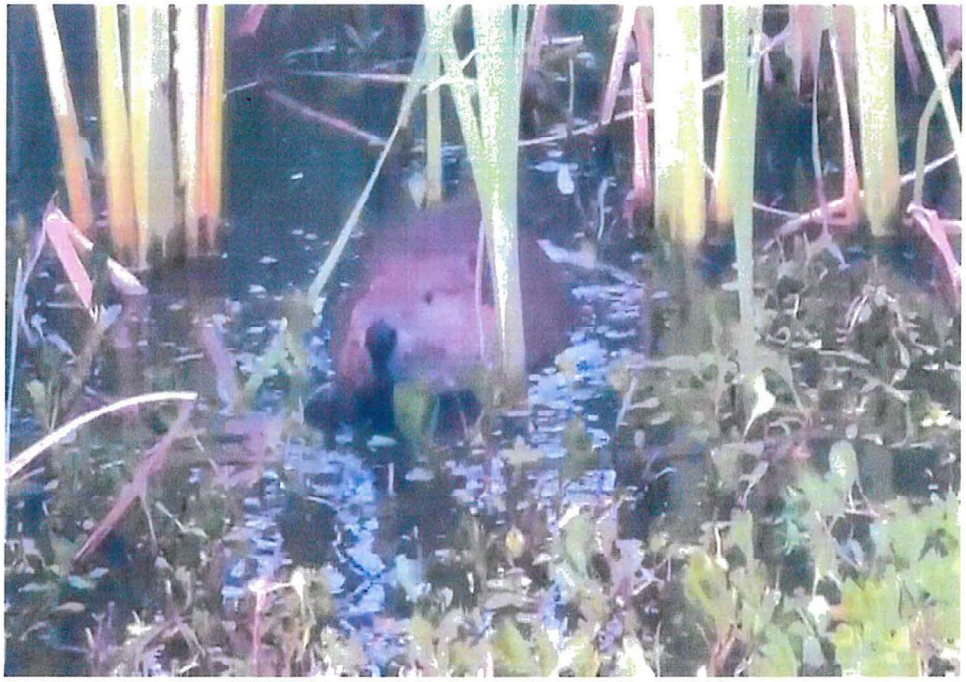
## Legal Insufficiency of a Mitigated Negative Declaration

Even aside from the Section 15183 concerns, the Draft MND fails to account for the significant environmental, health, and community impacts described above. Approving the project under an MND would violate CEQA and expose the City to legal challenge.

## Conclusion

For all the reasons outlined, I respectfully request that the City reject the Draft Mitigated Negative Declaration and require a full Environmental Impact Report for the Zinfandel Subdivision Project (PL19-0016). The environmental costs are too high, the flooding risks too great, the health hazards too serious, and the community impacts too severe to proceed without thorough review. Thank you for the opportunity to comment. This letter is submitted for the record during the CEQA public review period ending September 5, 2025, by 5:00 PM.

# Appendix A: Wildlife Photographic Evidence



Adult Beaver - Seen Summer 2021 - Present, Salvador Creek, Napa, CA



Baby Beaver - November 26, 2024, Salvador Creek, Napa, CA

2
CONT

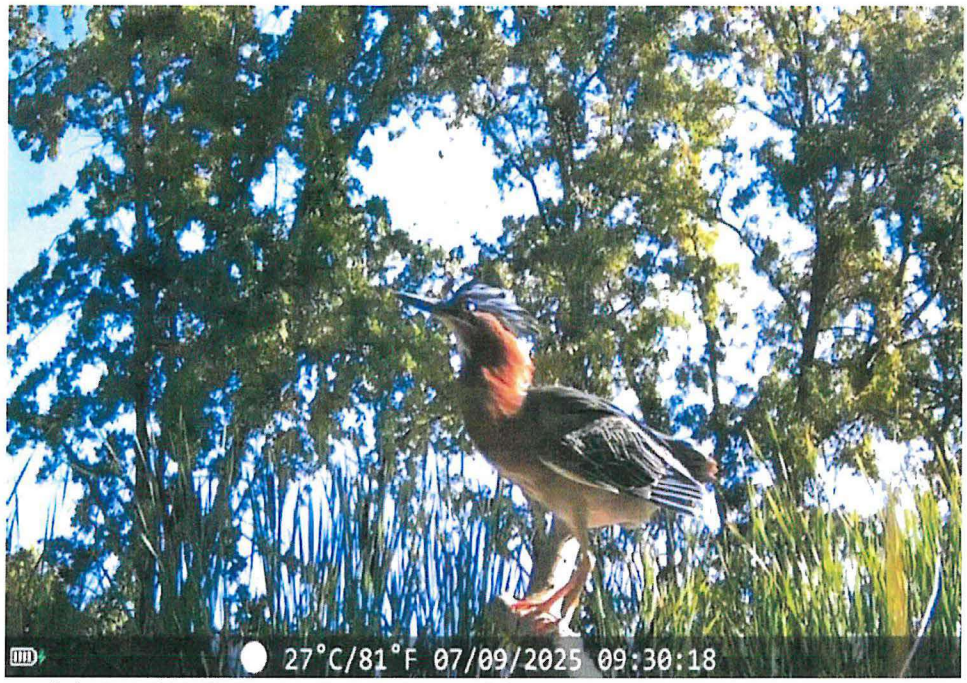


River Otter - July 7, 2025, Salvador Creek, Napa, CA



River Otter - January 2, 2025. Seen Summer 2021 - Present, Salvador Creek, Napa, CA

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CONT




Green Heron, July 9, 2025, Salvador Creek, Napa, CA



Hooded Merganser, Male - March 13, 2025, Salvador Creek, Napa, CA

2
CONT

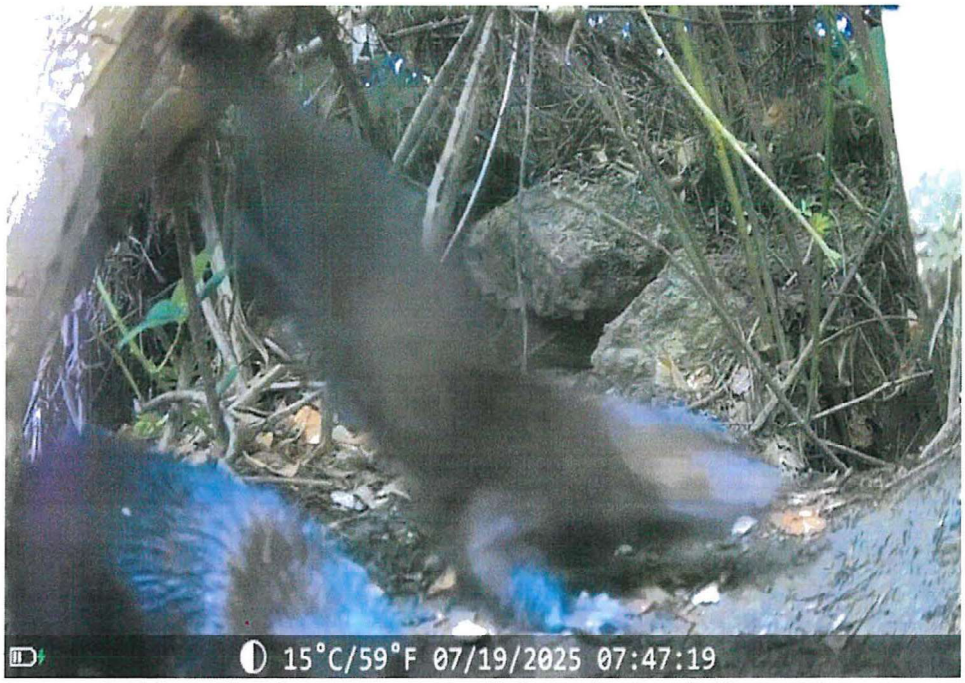


Hooded Merganser Pair - February 21, 2025, Salvador Creek, Napa, CA



Adult Mink - Spotted June 2025 - Present, Salvador Creek, Napa, CA

2
CONT




Mink Kits Playing - Still from Trail Cam, July 19, 2025, Salvador Creek, Napa, CA

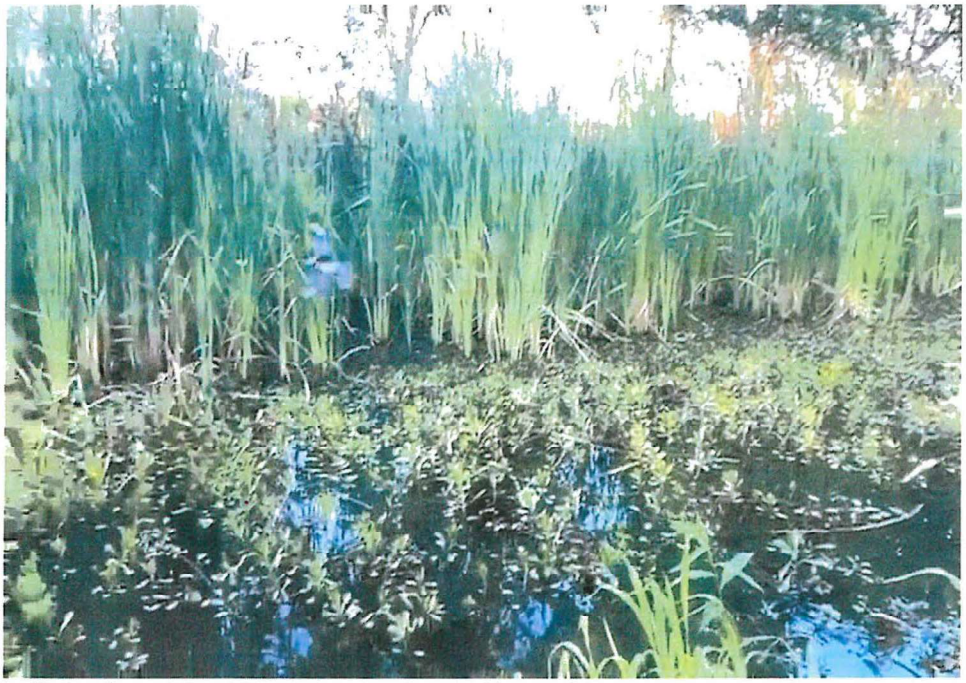



Mink Kits Playing - Still from Trail Cam July 19, 2025, Salvador Creek, Napa, CA

2
CONT



Belted Kingfisher - June 25, 2025, Salvador Creek, Napa, CA, Noted from Summer 2020 to Present



Kingfisher in flight, June 25, 2025, Salvador Creek, Napa, CA

2
CONT



Chinook Salmon - November 26, 2024, Salvador Creek, Napa, CA



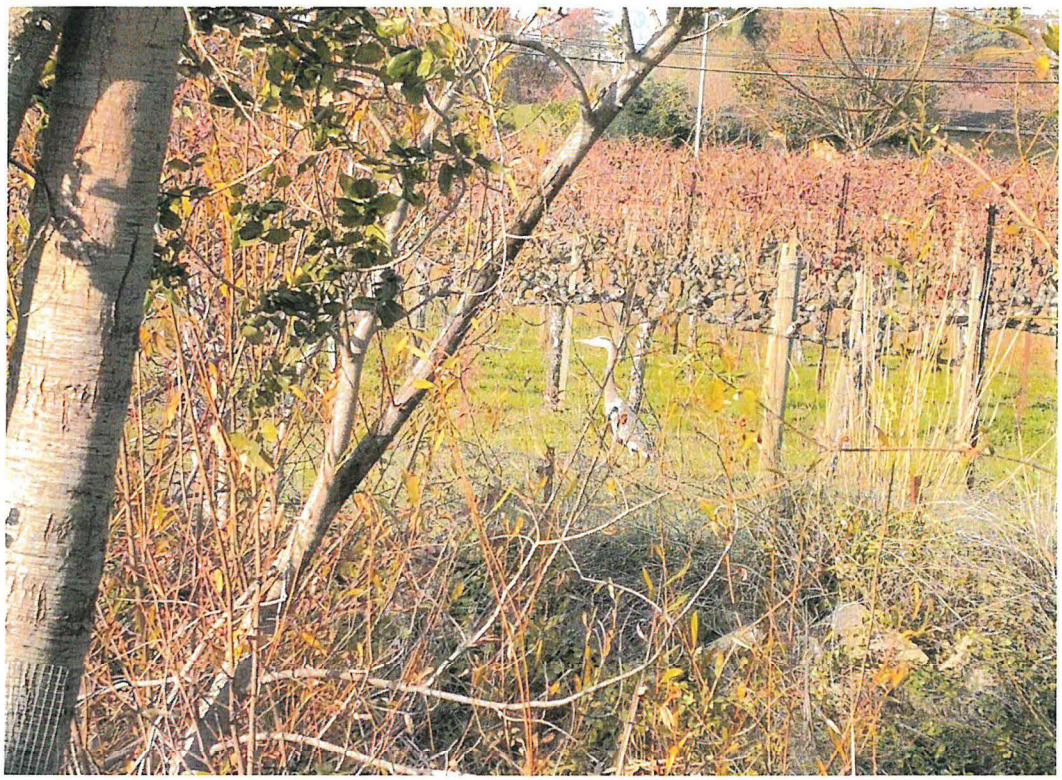
Chinook Salmon - November 26, 2024, Salvador Creek, Napa, CA

2
CONT



Red Shoulder Hawk - Noted From Summer 2020 to Present, Salvador Creek, Napa, CA

2
CONT



Blue Heron - December 11, 2024, Salvador Creek, Napa, CA



Great Egret - December 12, 2023, Salvador Creek, Napa, CA

2
CONT

# Appendix B: Flooding Photographic Evidence



Flooding at Valencia Street - February 4, 2025, Napa, CA



Flooding at Valencia Street - February 4, 2025, Napa, CA

2
CONT



Flooding at Valencia Street - February 4, 2025, Napa, CA



Salvador Creek Flooding — Overflow into vineyard area - February 4, 2025, Napa, CA

*Note: These still images are representative frames from trail camera and personal video footage. Full-length video files are available to the City of Napa Planning Commission upon request.*

2
CONT

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***Susan Vaziri (VAZIRI 2)***

*Response to VAZIRI 2-1*

The comment is noted and will be provided to the decision-makers for their review and consideration of the proposed project as a whole. No further response is required.

*Response to VAZIRI 2-2*

The comment is noted. Please refer to *Responses to VAZIRI 1*. No further response is required.

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**From:** Beth Wagner
**To:** mallen@cityofnapa.org
**Subject:** Zinfandel Subdivision Disapproval
**Date:** Monday, August 25, 2025 7:30:20 AM

You don't often get email from napabeth@comcast.net. Learn why this is important

[EXTERNAL]

Hi,
Please do not approve this new subdivision on El Centro. This street is already very busy with school traffic and adding more homes and cars will negatively impact our protected open space, streams, wildlife, add more traffic congestion, etc.
Thank you!
Sincerely,
Beth Wagner
Dan Williams
Stover St

1

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***Beth Wagner and Dan Williams (WAGNER AND WILLIAMS)***

*Response to WAGNER AND WILLIAMS-1*

The comment is noted. Please refer to Master Response 3, General Opposition Comments Not Addressed in the Final MND, in Section 2, Master Responses, of this document. Master Response 3 provides a response to comments that express general opposition or disapproval of the proposed project. No further response is required.

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**From:** Robert L
**To:** Michael Allen
**Subject:** Environmental Impact Report (EIR) Zinfandel Subdivision (PL19-0016)
**Date:** Saturday, August 30, 2025 8:33:19 AM

You don't often get email from isashops23@gmail.com. Learn why this is important

[EXTERNAL]

I am in full agreement with the letter that Geni Levin has submitted in regard to the requirements of a full EIR for the above noted project. As I am sure you are aware that it is the Planning Department's staff to responsibly review to the full extent projects of this nature. The number of points given in Levin's letter points out that not all considerations have been made with due diligence. The citizens of Napa have entrusted the Planning Department staff and elected officials to protect the environment that we live in. Please administer your due diligence and send this project for environmental review and other studies that should be required for this project. Your review of this project is sorely needed so that there is protection for we citizens of Napa when reviewing such projects.

Respectfully Submitted

Robert Walker, Architect

1

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***Robert Walker (WALKER)***

*Response to WALKER-1*

The comment is noted. Please refer to Master Response 3, General Opposition Comments Not Addressed in the Final MND, in Section 2, Master Responses, of this document. Master Response 3 provides a response to comments that express general opposition or disapproval of the proposed project. Additionally, please refer to *Responses to G. LEVIN*. No further response is required.

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**From:** Jennifer Wall
**To:** mallen@cityofnapa.org
**Subject:** Public Input RE: Zinfandel Subdivision Project (PL19-0016)
**Date:** Friday, September 5, 2025 1:52:38 PM

You don't often get email from jwall13@gmail.com. Learn why this is important

[EXTERNAL]

Dear Michael Allen,

I'm writing today with regards to the proposed approval of the Zinfandel Subdivision Project intended for the location at 1583 and 1687 El Centro Avenue.

With the size of the project and magnitude of the communal impact on our neighborhood, I greatly oppose the Mitigated Negative Declaration for Zinfandel Subdivision (PL19-0016) and formally request a full Environmental Impact Report. 1

Kindly, please confirm receipt.

With Regards,
Jennifer

Jennifer Wall
North Napa Resident
jwall13@gmail.com
925-768-7068

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***Jennifer Wall (WALL)***

*Response to WALL-1*

The comment is noted. Please refer to Master Response 3, General Opposition Comments Not Addressed in the Final MND, in Section 2, Master Responses, of this document. Master Response 3 provides a response to comments that express general opposition or disapproval of the proposed project. No further response is required.

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**From:** Spencer Wheat
**To:** mallen@cityofnapa.org
**Subject:** PL19-0016 Zinfandel Subdivision_DRAFT Mitgated Negative Declaration
**Date:** Friday, September 5, 2025 1:40:16 PM

You don't often get email from spencerwheat73@gmail.com. Learn why this is important

[EXTERNAL]

Hello,

-This message is to give my support to the commissioning of this project-

My name is Spencer Wheat, I am a 26 year old Systems Engineer for a company named Resynergi. This company's sole foundation lies within creating a cleaner, more sustainable world by revolutionizing the recycling industry and creating a circular economy for plastic waste. As a dedicated steward of the environment and a longtime resident of the City of Napa, I would like to give my support to this project.

The proposed development project has my support for several reasons. In regards to CEQA's concerns, the environmental factors must be assessed. In regards to the checklist on section 2 of the PDF listed on your website, many of those factors are affected in a positive way, such as public service, land use, housing, transportation, aesthetics, and more. Focusing on land use, the location of this project to be dedicated to benefiting housing is very practical. The entire surrounding areas of this project site location are constructed single-family homes. This area once dedicated for agriculture has closed in over time, thus enclosing this 9.56 acres of agricultural land in such a non-practical way from the start. Driving by El Centro, it feels almost out of place to go from a suburban aesthetic with several single-family homes to a brief sprawl of land, then back to a suburban aesthetic. Just my personal preference but this land has always seemed to me best used for housing development, not for agricultural needs. The dedicated agricultural lands of Napa Valley should be consistent with keeping the agricultural zoning on the exteriors of the City, rather than keeping this closed section of land. Take the new housing developments on Wine Country Ave and Linda Vista for example. In my eyes, it made less sense to start a new housing development there than this proposed plan does, since it is on the edge of the suburban areas of the city. However, it was still a very feasible area to create more single-family homes, especially with the new developments and growing residency of the City of Napa. That housing development project has only helped the City of Napa with its growing population and in the long-term benefits Napa's local economy, as this proposed plan will also do. Napa's environment should not noticeably be affected negatively by this as long as the Salvador Channel remains undisturbed, as planned.

1

Some of the concerned residents of El Centro Ave have made statements opposing this project because of the negative aesthetic from their homes. Although this is something to consider, I do not think this is a matter that outweighs any of the positives of this development. For one, being a private residency and not a recreational zone, the current residents across El Centro Ave from this property are only benefiting from this private residency from window view. With this plan commissioning, the only difference to them would be a window view of homes. I'd hope to combat this negative impact there are plans to plant trees along El Centro Ave so they have a more natural aesthetic. Please consider those residents, but overall consider the heavier benefits that come with commissioning this project. Overall this will do a net positive for the future families that reside in these homes, local businesses, and the economy of the City of Napa. Napa's economy and business is in a state of growth, to so keep up with this,

developing housing in areas that **make sense** and keeping Napa Valley true to being an agricultural county is just one sustainable solution to Napa Valley's development. 1 CONT

Thank you for considering my message and thoughts.

Best Regards,
Spencer Wheat

***Spencer Wheat (WHEAT)***

*Response to WHEAT-1*

The comment is noted. Please refer to Master Response 1, Support for the Proposed Project, in Section 2, Master Responses, of this document. No further response is required.

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# 4 - ERRATA

The following are revisions to the Draft Mitigated Negative Declaration (Draft MND) and associated documents for the Zinfandel Subdivision Project (proposed project).

These revisions are minor modifications and clarifications to the document and do not change the significance of any of the environmental issue conclusions within the Draft MND or associated documents. The revisions are listed by page number. All additions to the text are underlined (underlined) and all deletions from the text are stricken (~~stricken~~).

## Chapter 1, Introduction

### *Page 1, "1.2.1–Project Location," First Paragraph, Second Sentence*

This sentence has been edited to correct the Assessor's Parcel Numbers (APNs) included in the MND because a lot line adjustment was completed by the property owners prior to the completion of the MND.

> The project site corresponds to Assessor's Parcel Numbers (APNs) ~~038-361-009~~038-361-042, 038-361-040, and 038-361-010.

### *Page 5, "1.4.1–Development Summary," First Sentence*

As noted in the memorandum submitted to the State Clearinghouse (SCH) on August 25, 2025, the name of the project applicant has been corrected in the MND.

> The project applicant, ~~Crown Realty Property Management~~ Randy Gularte, proposes to develop a 51-lot subdivision containing 51 single-family homes, 12 ADUs, 10 junior ADUs, and related improvements on approximately 9.56 acres (Exhibit 4).

### *Page 5, "1.4.1–Development Summary," Second Bullet Point*

This bullet point has been revised to clarify that the proposed project would provide a public easement and would pay fair-share fees toward the future construction of the trail by the City.

> ~~Construction~~ Dedication of a public easement for an eight-foot-wide walking trail along the southern side of Salvador Channel with 2-foot-wide shoulders on each side (replacing an existing informal walking path) connecting to a future Class I trail planned along Salvador Channel between Jefferson Street and SR-29, as well as the payment of applicable fair-share costs for the future construction of the trail by the City.

### *Page 5, "1.4.1–Development Summary," Second Paragraph, Second Sentence*

This sentence has been edited to reflect the correct number of trees being proposed for removal.

Additionally, the existing vineyards on the project site would be removed, as well as ~~29~~42 trees.

## Section 2.1, Biological Resources

***Page 29, "Setting," First Paragraph, Final Sentence***

This sentence has been edited to reflect Bill Pramuk as the consulting Arborist on the proposed project.

Field surveys in support of the Arborist Report were conducted in January 2019 and May 2024 by ~~Randy Gularte~~ Bill Pramuk, a consulting Arborist.

***Page 39 to 40, "e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?"***

This section has been edited to clarify the number and location of trees being removed.

**Less than significant impact with mitigation incorporated.** Potential impacts to protected trees and associated mitigation are based on the Arborist Report, prepared by Pramuk, dated January 2019, revised in May 2024. The proposed project could damage or remove trees protected by the City of Napa Municipal Code, Chapter 12.45–Trees on Private Property. Both "protected native trees" and "significant trees" are protected under the City's ordinance. A "significant tree" is defined as a tree possessing special qualities.[12] The ordinance identifies a "protected native tree" as a native tree species, including valley oak and coast live oak, 12 inches or greater in diameter.[13] Chapter 12.45 of the City's Municipal Code requires protection and avoidance measures for any construction activity within 30 feet of the drip line of a protected native tree. Additionally, the removal of any protected native tree is prohibited unless a permit is obtained by the applicant in accordance with City regulations. Project work around native trees could adversely affect these trees if adequate protection measures are not implemented.

No trees on-site are considered significant trees under City regulations. However, the project vicinity contains two protected native trees (Tree Nos. 1 and 9), one of which (Tree No. 9) is proposed for removal. The remaining 41 trees proposed for removal are not identified as protective native trees and would not require permitting or mitigation pursuant to the City's Municipal Code.

~~The ordinance identifies a "protected native tree" as a native tree species, including valley oak and coast live oak, 12 inches or greater in diameter.[13]~~

Tree No. 9 is an approximately 14.2-inch valley oak at the top of the creek bank (Appendix B–Tree Survey Map on Page 4 of Arborist Report). Tree No. 9 would be removed and mitigated in accordance with the City's Municipal Code requirements detailed in MM BIO-5a.

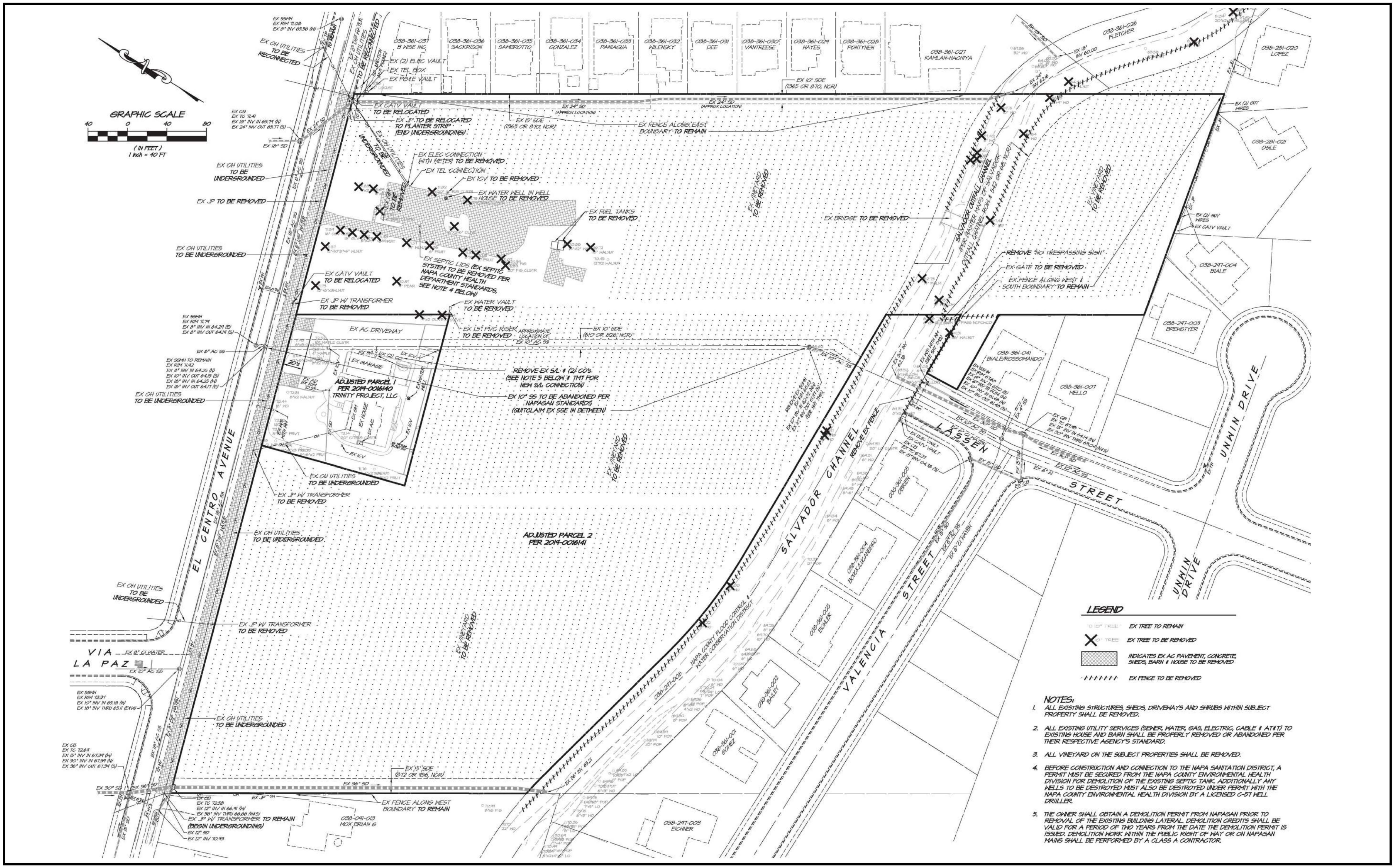
Tree No. 1 is a multi-trunk coast live oak on the property boundary, approximately 30 inches in diameter (Appendix B–Tree Survey Map on Page 4 of Arborist Report). Tree No. 1 would be preserved and protected by the establishment of Tree Protection Zones (TPZs) as detailed in MM BIO-5b. ~~An Arborist Report, prepared by Pramuk in 2024, determined that the project site contains a small grove of trees located at the top of the channel bank (Tree Nos. 2, 3, 4, 5, 6, 7, 8, and 10, as shown on Exhibit 10), that are not considered significant trees or protected native trees as defined by the City's Municipal Code. Additionally, the small grove of trees is not proposed for removal or at risk from construction-related impacts. The landscape-ornamental trees clustered around the existing residential structure on-site (Trees Nos. 11 through 18) are proposed for removal and would not require permitting as they do not qualify as significant trees under the City's Municipal Code. Exhibit 10 locates all trees on the project site and also identifies trees considered significant or protected, as evaluated in the 2024 Arborist Report pursuant to the City's ordinance. As shown, the project site does not contain any significant trees but does contain two protected native trees, as further discussed below.~~

~~The 2024 Arborist Report identified one protected native tree on-site and one on the southwestern project boundary. The proposed project would remove a small number of native riparian trees for the construction of the overflow terrace and walking path. The single protected native tree on-site is a valley oak that is approximately 14.2 inches in diameter, on the top of the channel bank (No. 9). Another protected native tree located on the southwest project boundary is a multi-trunk coast live oak (No. 1), approximately 30 inches in diameter (Appendix B–Tree Survey Map on Page 4 of Arborist Report). Both protected trees could be at risk of severe damage or death due to construction-related ground disturbance. Chapter 12.45 of the City's Municipal Code requires protection and avoidance measures for any construction activity within 30 feet of the drip line of a protected native tree. Additionally, the removal of any protected native tree is prohibited unless a permit is obtained by the applicant in accordance with City regulations. Project work around native trees could adversely affect these trees if adequate protection measures are not implemented.~~ Thus, i~~I~~mpacts to protected native trees as defined by the Municipal Code would be mitigated to a less than significant level through the implementation of MM BIO-5a and MM BIO-5b. Adherence to the City's Municipal Code would ensure potential conflict with any local policies or ordinances would be considered less than significant.

***Page 41, Exhibit 10: Tree Survey Map***

This exhibit has been updated to reflect the correct number and location of trees being proposed for removal.

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Source: RSA Consulting Civil Engineers & Surveyors, 09/15/2023.

**Exhibit 10**
Tree Removal Map

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## Appendix A: CEQA Guidelines Section 15183 Consistency Checklist

### *Chapter 1, Project Description*

*Page 3, "2.1.1–Project Location," First Paragraph, Second Sentence*

This sentence has been edited to correct the Assessor's Parcel Numbers (APNs) included in the Consistency Checklist because a lot line adjustment was completed by the property owners prior to the completion of the Consistency Checklist.

> The project site corresponds to Assessor's Parcel Numbers (APNs) ~~038-361-009~~038-361-042, 038-361-040, and 038-361-010.

*Page 5, "2.3.1–Development Summary," First Sentence*

As noted in the memorandum submitted to the State Clearinghouse (SCH) on August 25, 2025, the name of the project applicant has been corrected in the Consistency Checklist.

> The project applicant, ~~Crown Realty Property Management~~ Randy Gularte, proposes to develop a 51-lot subdivision containing 51 single-family homes, 12 ADUs, 10 junior ADUs, and related improvements on approximately 9.56 acres (Exhibit 4).

*Page 6, "2.3.1–Development Summary," Second Paragraph, Second Sentence*

This sentence has been edited to reflect the correct number of trees being proposed for removal.

> Additionally, the existing vineyards on the project site would be removed, as well as ~~29~~42 trees.

*Page 5, "2.3.1–Development Summary," Second Bullet Point*

This bullet point has been revised to clarify that the proposed project would provide a public easement and would pay fair-share fees toward the future construction of the trail by the City.

> ~~Construction~~ Dedication of a public easement for an eight-foot-wide walking trail along the southern side of Salvador Channel with 2-foot-wide shoulders on each side (replacing an existing informal walking path) connecting to a future Class I trail planned along Salvador Channel between Jefferson Street and SR-29, as well as the payment of applicable fair-share costs for the future construction of the trail by the City.

*Page 46, "TR9: Bicycle and Pedestrian Access and Facilities"*

This section has been revised to clarify that the proposed project would provide a public easement and would pay fair-share fees toward the future construction of the trail by the City.

> Consistent. The proposed project site currently does not contain any sidewalk facilities along El Centro Avenue. Implementation of the proposed project would include the construction of sidewalk facilities along El Centro Avenue, which would help in expanding the City of Napa's sidewalk facilities and connectivity. In addition, the proposed project includes the ~~construction~~ dedication of a public easement and payment of fair-share costs for ~~of~~ a new multiuse trail.

This would contribute to the Bay Area Air District's efforts to encourage planning for pedestrian and other active transportation facilities.

*Page 47, "Criterion 3," Sixth Sentence*

This sentence has been revised to clarify that the proposed project would provide a public easement and would pay fair-share fees toward the future construction of the trail by the City.

> The proposed project would also include ~~construction of~~ dedication of a public easement and payment of fair-share fees for a new, multiuse trail.

*Page 50, "Construction Exhaust Air Pollutant Emissions: ROG, $NO_X$, $PM_{10}$ and $PM_{2.5}$," Third Paragraph, Third Sentence*

This sentence has been revised to clarify that the proposed project would provide a public easement and would pay fair-share fees toward the future construction of the trail by the City.

> The off-site improvements portion relates to improvements to El Centro Avenue (including widening of the street and construction of curb and gutter and a sidewalk) and ~~construction of~~ dedication of an easement for a multiuse trail.

*Page 82, "Decreasing Overall Per Capita Energy Consumption," First Paragraph, Fifth Sentence*

This sentence has been revised to clarify that the proposed project would provide a public easement and would pay fair-share fees toward the future construction of the trail by the City.

> In addition, the proposed project includes the construction of a sidewalk along El Centro Avenue, as well as the ~~construction of~~ dedication of a public easement for a new, multiuse trail, thus providing additional pedestrian and/or bicycle connectivity to reduce VMT.

*Page 103, First Paragraph, Sixth Sentence*

This sentence has been revised to clarify that the proposed project would provide a public easement and would pay fair-share fees toward the future construction of the trail by the City.

> In addition, the proposed project includes the construction of a new sidewalk on El Centro Avenue and the dedication of a public easement for a multi-purpose trail, both designed to promote non-vehicular use and reduce VMT.

*Page 106, "Metropolitan Transportation Commission Plan Bay Area," Fourth Sentence*

This sentence has been revised to clarify that the proposed project would provide a public easement and would pay fair-share fees toward the future construction of the trail by the City.

> Additionally, the proposed project includes construction of a sidewalk on El Centro Avenue and the dedication of a public easement for a multiuse trail that would promote non-vehicular modes of travel.

## Appendix B: Biological Resources Supporting Information

### *Appendix B.5–2019 Arborist Report*

The 2019 Arborist Report has been attached to the MND as Appendix B.5.

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