

COUNTY OF NAPA
DEPARTMENT OF PLANNING, BUILDING AND ENVIRONMENTAL SERVICES
1195 THIRD STREET, SUITE 210
NAPA, CA 94559
707-253-4416

Initial Study Checklist
Reference Napa County's Procedures for Implementing CEQA, Appendix C

1. **Project Title:** B&F Farms Vineyard, Track 1 Erosion Control Plan Application (ECPA) File #P25-00029-ECPA
2. **Property Owner(s):** Roberta Damele, Trustee ETAL
3. **Contact Person, Phone Number and Email:** Donald Barrella, Principal Planner, 707-299-1338, donald.barrella@countyofnapa.org
4. **Project Location and Assessor's Parcel Number:** 7335 St. Helena Highway, Napa County, CA 94558
 Assessor's Parcel Numbers (APNs) 034-030-029 and -030 - **Figures 1 and 2**
 Sections 10 and 11, Township 6 North Range 5 West, Mt. Diablo Base and Meridian
 Latitude 38° 22' 53.58" North, Longitude 122° 23'19.79" West
5. **Project Sponsor:** Mike Hawkins
 c/o Roberta Damele Trustee ETAL.
 P.O. Box 3463
 Yountville CA 94599
Agent: James R. Bushey, RPE #49931
 PPI Engineering
 2800 Jefferson Street
 Napa, CA 94558
6. **General Plan Designation:** Agriculture, Watershed and Open Space, AWOS
7. **Zoning:** Agricultural Watershed, AW
8. **Description of Project:** The proposed project involves the clearing of vegetation consisting of non-native annual grassland, coyote brush scrub, coast live oak woodland, and ruderal or otherwise developed or disturbed lands, earthmoving and land contouring, and installation and maintenance of erosion control measures associated with the development of approximately 10.7 gross acres of vineyard, or proposed development area or project area, with approximately 7.8 net planted acres in eight vineyard blocks, located on an approximate 120-acre holding, or project site. The acreages of each of the vineyard blocks are indicated in **Table 1**. The proposed project includes the removal of 365 trees with a size greater than 6-inches diameter at breast height: **Exhibit B-2**. The proposed project would be irrigated by two existing on-site groundwater wells with an anticipated water demand of approximately 5.6 acre-feet per year: **Exhibit D**.

Table 1 – Proposed Vineyard Block Acreage¹

Block	Gross Acreage	Net Acreage
1	1.1	0.9
2	1.6	1.1
3	3.2	2.5
4	2.6	2.0
5	0.5	0.3
7	0.6	0.3
8	0.8	0.5
9	0.3	0.1
Total	10.7	7.8

¹: The project originally proposed 11.1-acres but was reduced by 0.4-acres, eliminating Block 6.
 Source: PPI Engineering, 2024 – **Exhibit A**: Numbers may not add up due to rounding.

Rock removed during vineyard development would be stored in an identified rock storage area located off the southeast end of Vineyard Block 2 encompassing approximately 0.2-acres: rock may also be used in the construction of erosion control and runoff features such as rock level spreader, rock aprons and rock protected outfalls, lining diversion ditches, or used on vineyard avenues or existing roads. Any short-term stockpiles, if needed, would be located within the proposed development area. There would be no transport of spoils off-site. Proposed wildlife exclusion fencing (i.e. deer fencing) would enclose Vineyard Blocks 1 through 5 as an individual unit, Vineyard Blocks 7 and 8 as an individual unit, and Block 9 as an individual unit - **Figure 3 of Exhibit A**. New main irrigation pipelines would be installed in existing roads and within the proposed development areas - **Figure 5 of Exhibit A**. Existing drainage diversion ditches and culverts would be repaired and maintained as needed.

Erosion Control Measures: Temporary erosion control measures include installation of straw wattles, the application of straw mulch at a rate of 3,000 pounds per acre, and other practices as needed. Permanent erosion control measures include rock level spreader, diversion ditches, drop inlets and associated subsurface drainage lines, rock aprons and rock protected outfalls, the repair and maintenance of existing ditches as

necessary, and a permanent no-till cover crop maintained with minimum plant residue density of 80%. Details of the proposed erosion and runoff control measures are provided in the B&F Farms Track I Erosion Control Plan prepared by PPI Engineering, Napa, California - **Exhibit A**.

Earthmoving: Earthmoving and grading activities associated with the proposed project include, but are not limited to, vegetation removal, soil ripping, rock removal, disking, recontouring, incorporation of soil amendments, trenching for irrigation lines, improvement of existing access roads to connect development areas, diversion ditch and culvert repairs, and the development of erosion and runoff control measures.

Other Activities and Features: Other activities and features of the proposed project and subsequent vineyard development and operation include:

- a. Installation of vineyard trellis and drip irrigation systems, and planting of rootstock in a 3-foot by 5-foot spacing pattern for an approximate vine density of 2,904 vines per acre.
- b. Ongoing inspection and maintenance of temporary and permanent erosion and runoff control measures.
- c. Ongoing operation and maintenance of the vineyard and associated infrastructure including vine management (pruning, fertilization, and pest and disease control), weed control, cover crop mowing/grazing, irrigation and trellis system maintenance, and fruit harvesting. The management regime of the no-till cover crop would consist of mowing/grazing, weed whacking, and hand hoeing¹.

Table 2 lists a general schedule for the construction of the proposed project as identified in #P25-00029-ECPA and **Table 3** outlines typical general ongoing vineyard operations. The vineyard is anticipated to be developed in one phase, with construction occurring for up to six months during the year. The final implementation schedule is pending action on #P25-00029-ECPA.

Table 2 – Implementation Schedule

April 1 – October 1	Remove existing vegetation, complete ripping, grading and disking, planting
October 15 ¹	All winterization complete, including seeding, straw mulching, and straw wattle installation.
October 16 – March 31	Maintain erosion and sediment control devices, inspect after all rain events producing significant runoff, re-seed temporary cover crop as needed to maintain appropriate cover.

¹ October 15 to April 1 of the succeeding year, no earthmoving work is allowed by the Napa County Code (NCC) Section 18.108.070(L).

Table 3 – Typical Annual Operations Schedule

January to February	a. Prune vines.
March to August	a. Sulfur application to protect against mildew. b. Mow and/or graze cover crop. c. Weed control utilizing hand hoeing.
September to October	a. Harvest. b. Winterize vineyard and vineyard avenues.
November to April	a. Monitor and maintain erosion control measures and repair as necessary during rain events.

Vineyard construction is anticipated to generate up to 10 round trips per day for anticipated work crews of up to 20 employees, including truck trips for equipment and supply delivery. Anticipated construction equipment would include one or more of the following: bulldozer, excavator, small tractors including backhoe, dump truck, water truck, ATV, and other agricultural vehicles including passenger cars, trucks and vans.

Proposed vineyard operations are anticipated to generate up to approximately 150 truck trips annually. Typical operations include but are not limited to irrigation and trellis system inspection and repair, erosion and runoff control measure monitoring and maintenance including cover crop inspection and management, and vine/vineyard inspections, on the days when these activities occur. During peak operations, activities such as vineyard pruning, weed and pest control, and harvest are anticipated to generate up to 20 round trips per day, including grape haul trucks, for anticipated work crews of up to 20 employees. Anticipated equipment for vineyard operations would include track and wheeled driven tractors and agricultural equipment including but not limited to grape haul trucks, backhoes or similar, flatbed and dump trucks, water trucks, ATVs, and other agricultural vehicles including passenger cars, trucks and vans.

Implementation of the proposed project would be in accordance with the Track I Vineyard Development and Erosion Control Plan prepared by PPI Engineering, June 2025 – **Exhibit A**. The proposed project is further described in the application materials including the Supplemental Project Information sheets. All documents are incorporated herein by reference and available for review in the Napa County Department of Planning, Building and Environmental Services (PBES), and at [Current Projects Explorer | Napa County, CA](#)

9. Describe the environmental setting and surrounding land uses.

The approximate 120-acre project site is located approximately 1.25 and 1.75 miles west/northwest of the Veterans Homes of California Yountville, and downtown Yountville, respectively. Geographically the project site is situated on the west side of Napa Valley on the southeastern flank of the Western Mountains in the Dry Creek and Veterans Peak area of Napa County. General topography of the site and

¹ The owner/permittee has identified and confirmed that no herbicides are proposed or anticipated to be utilized for cover crop management.

vicinity consists of moderately to steeply sloped, southern to southeastern facing hillsides between knoll tops that separate the Hopper Creek and Dry Creek Drainages, in which the project site is located. Elevations of the project area range from 400 to 1,050 feet above sea level. Slopes in the project area typically range from 13% to 32%, with an average slope of 22%.

Hopper Creek, a U.S. Geological Survey (USGS) blue-line stream is located approximately 0.25 miles, or approximately 1,350 feet, north of the project site. Two unnamed blue-line tributaries to Dry Creek are located approximately 0.15 miles (± 800 feet) to the west of the site, the other is within the project site located 65 feet from the project area: **Figure 1** and **Exhibit A**. There are three other minor ephemeral drainages located adjacent to the project area that are associated with this unnamed blue-line stream. Drainage from the project site and area is characterized by surface sheet flow with runoff generally flowing toward the Dry Creek Drainage and to a lesser extent the Hopper Creek Drainage. Dry Creek connects to the Napa River approximately 6.25 miles east/southeast of the site, Hopper Creek connects to the Napa River approximately 6 miles to the east/northeast. The project site is not located in the Napa Valley Subbasin Groundwater Sustainably Agency (GSA) boundary.

Surrounding properties are used for agricultural (vineyard) and rural residential purposes. The abutting property to the north and other properties to the north contain vineyard, and the abutting property to the south contains vineyard. There are no wineries in the immediate vicinity, the closest wineries are located over a mile to the south, east and west. The closest residences to the project site are located between 0.25 miles ($\pm 1,350$ feet) to the south and 0.35 miles ($\pm 1,800$ feet) to the west in the Dry Creek Valley.

An existing access road, i.e., Napanook Road, provides access to the project site, which is located at the terminus of Napanook Road approximately 3 miles southwest of its intersection with Highway 29 at Madison Street in the Yountville area of Napa County. Existing improvements on the project site include a single-family residence, a second dwelling unit, pool, and associated accessory structures (barn and storage building).

Soils in the project site include Felton gravelly loam, Soil Series #136, Lodo-Maymen-Felton association, Soil Series #157, and Sobrante loam, Soil Series #179: Soil Survey of Napa County USDA 1978 and **Exhibit B-1**. The development area consists exclusively of Felton gravelly loam - **Exhibit A**. The closest active fault is the West Napa Fault located approximately 1.75 miles east: Napa County GIS Fault Layers.

The vegetation types within the holding include non-native annual grassland, coyote brush scrub, chamise chaparral, coast live oak woodland, knobcone pine woodland, Douglas fir forest, pond, seasonal wetland, and ruderal or otherwise developed or disturbed lands. Vegetation types within development areas include non-native annual grassland, coyote brush scrub, coast live oak woodland, and ruderal land.

- 10. Background:** The proposed project was originally designed to include 11.1 gross acres of vineyard development with approximately 8.0 planted acres but was subsequently revised to remove a proposed vineyard block located between Vineyard Blocks 4 and 7 that was identified as Vineyard Block 6 that totaled 0.4 gross acres and 0.2 planted acres. This vineyard block was removed to preserve wildlife movement through the holding in an east west direction. Removing this vineyard block reduced the project to 10.7 gross acres with approximately 7.8 net planted acres.
- 11. Other agencies whose approval may be required** (e.g., permits, financing approval, or participation agreement that may potentially be required from the identified permitting authority/agency).

Responsible (R) and Trustee (T) Agencies

Regional Water Quality Control Board (Regional Water Board) (R)
California Department of Fish and Wildlife (CDFW) (T)

Other Agencies Contacted

Middletown Rancheria
Mishewal Wappo Tribe of Alexander Valley
Yocha Dehe Wintun Nation

- 11. California Native American Tribal Consultation:** Have tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code Section 21080.3.1? If so, has consultation begun?

Notice of the proposed project was sent via certified mail and email to the Mishewal Wappo Tribe of Alexander Valley, the Middletown Rancheria, and the Yocha Dehe Wintun Nation on March 3, 2025.

On March 21, 2025, the Yocha Dehe Wintun Nation responded that the project site is not within their aboriginal territories, and therefore the invitation for consultation was declined (YD-03042025-01). The County acknowledged the response in a letter and email dated April 4, 2025, and closed the consultation invitation.

No response to the invitation was received from the Middletown Rancheria. On April 14, 2025, the County sent a consultation closure notice via email and the US Postal Service to the Middletown Rancheria.

No response to the invitation was received from the Mishewal Wappo Tribe, and on April 14, 2025, the County sent a consultation closure notice via email and the US Postal Service to the Mishewal Wappo Tribe. On April 27, 2025, the County received an email from the Mishewal Wappo Tribe in response to the closure notice sent on April 14th requesting consultation. On April 30, 2025, the County had a phone conversation with Scott Gabaldon of the Mishewal Wappo Tribe to discuss measures to incorporate into the project. On May 29, 2025, a follow

up letter was sent (via email and the US Postal Service) to memorialize the measures to be included in any action on the application: the measures are disclosed and detailed in **Section XVIII (Tribal Cultural Resources)** of this initial study. Because there was agreement on the tribal resource protection measures to be included in the project, consultation has been concluded, which was acknowledged in the letter of May 29, 2025.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

- | | | |
|--|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input type="checkbox"/> Geology/Soils | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards & Hazardous Materials |
| <input type="checkbox"/> Hydrology/Water Quality | <input type="checkbox"/> Land Use/Planning | <input type="checkbox"/> Mineral Resources |
| <input type="checkbox"/> Noise | <input type="checkbox"/> Population/Housing | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation | <input checked="" type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities/Service Systems | <input type="checkbox"/> Wildfire | <input type="checkbox"/> Mandatory Findings of Significance |

ENVIRONMENTAL IMPACTS AND BASIS OF CONCLUSIONS

The conclusions and recommendations contained herein are professional opinions derived in accordance with current standards of professional practice. They are based on a review of the Napa County Environmental Resource Maps, the other sources of information listed in the file, and the comments received, conversations with knowledgeable individuals, the preparer's personal knowledge of the area, and visit(s) to the project site and proposed development area.

Other sources of information used in the preparation of this Initial Study include site-specific studies conducted and filed by the applicant in conjunction with ECPA #P25-00029-ECPA as listed below, and the environmental background information contained in the permanent file on this project. These documents and information sources are incorporated herein by reference and available for review at the Napa County Department of Planning, Building and Environmental Services located at 1195 Third Street, Suite 210, Napa, CA 94559, or the [Current Projects Explorer | Napa County, CA](#)

- PPI Engineering, June 2025, B&F Farms, 7335 St. Helena Hwy., Erosion Control Plan (**Exhibit A**)
- WRA Environmental Consultants, October 2024, Biological Resources Reconnaissance Survey, Demele Ranch (**Exhibit B-1**)
- WRA Environmental Consultants, May 30, 2025, Response to Application Completeness Determination (Biology), ECPA #P25-00029-ECPA (**Exhibit B-2**)
- Flaherty Cultural Resource Services, August 2, 2024, Cultural Resource Reconnaissance of ±12 Acres near Yountville, Napa County, California (a portion of APN 039-030-029 and -030, Hawkins-Damele Ranch) (**contents confidential**)
- PPI Engineering, January 29, 2025, B&F Farms Track I ECP, Soil Loss Analysis (**Exhibit C**)
- Richard C. Slade & Associates, January 6, 2025, Tier 1 & Tier 2 Water Availability Analysis, Hawkins-Damele Ranch (**Exhibit D**)
- PPI Engineering, January 29, 2025, B&F Farms Track I ECP, Hydrologic Analysis (**Exhibit E**)
- Site inspection conducted by Napa County Engineering and Conservation Division staff (Raulton Haye and Donald Barrella) March 11, 2025.
- Napa County Geographic Information System (GIS) sensitivity maps/layers

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared. Attached as **Exhibit F** is the signed Project Revision Statement.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



Signature

Donald Barrella

Printed Name

April 30, 2026

Date

Napa County Planning, Building and Environmental Services

ENVIRONMENTAL CHECKLIST FORM

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

Discussion

a-c. The project site is not located within the vicinity of an officially designated state scenic highway; Highway 29, which is listed as eligible, is located approximately 2 miles to the east. The project areas are located between two designated scenic corridor roads Dry Creek Road located approximately 0.5 miles to the west and Highway 29 located approximately 2 miles to the east (Napa County GIS Viewshed roads layer). The project site cannot be viewed from either of these roads due to intervening topography.

The project site is not located on a prominent hillside or major ridgeline (Napa County GIS Ridgelines layer). The project site is not located near a scenic vista, and there are no historic buildings on site. There are also no significant rock outcroppings or geologic features on the project site that would be impacted by the proposed project.

Land uses surrounding the project site include agricultural and rural residential and the proposed project would be consistent with these surrounding land uses. Therefore, for the reasons described above, the proposed project would have less-than-significant impacts on a scenic vista, scenic highway, historic buildings, scenic trees, rock outcrops, and the visual character and quality of the project site and surroundings.

d. Proposed agricultural operations of the project would require some lighted nighttime activities consistent with the nighttime activities already occurring within the immediate area, which include vineyard operations and maintenance. Lighting would be in the form of headlights or downward direction lights on equipment being used during nighttime activities that include Sulphur and pesticide application and harvesting. Sulphur and pesticide applications are anticipated to occur approximately 4 to 8 days a year and harvest is anticipated to last approximately 4 to 7 days typically occurring in September and October. These nighttime activities typically occur at times ranging from 8 p.m. to 7 a.m. Although some nighttime activity would occur for limited periods, the proposed project would not introduce a new source of substantial light or glare as these activities are already occurring in the area of the project site, and the type of nighttime lighting would be consistent with existing agricultural uses and surrounding area. Therefore, the proposed project would result in a less-than-significant impact.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
II. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resource Code Section 12220(g)), timberland (as defined in Public Resource Code Section 4526), or timberland zoned Timberland Production (as defined in Government Code Section 51104(g))? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Result in the loss of forest land or conversion of forest land to non-forest use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Discussion

- a. The project site is not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance by the California Department of Conservation: Napa County GIS FMMP Important Farmland layer, and California Important Farmland Finder². The site is mapped as Other Lands. The proposed project would result in an increase in productive agricultural farmland on the project site. Therefore, the proposed project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use, and there would be no impact.
- b. The project site has an Agriculture, Watershed & Open Space designation and is zoned Agricultural Watershed (Napa County GIS Zoning Layer). Therefore, the establishment of vineyard totaling approximately 10.7 gross acres, approximately 7.8 net planted acres, is consistent with project site's land use and zoning designations. The project site does not have a Williamson Act contract mapped with Napa County: Napa County GIS, Williamson Act Ag Contracts layer. Therefore, implementation of the proposed project would not conflict with the project site's land use designation or a Williamson Act contract. No impact would occur.
- c-d. Forest Land is defined in California Public Resource Code Section 12220(g) as, land that can support 10% native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits. Timberland is defined in California Public Resource Code Section 4526 as, land, other than land owned by the federal government and land designated by the board as experimental forest land, which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas Trees. Commercial species shall be determined by the board on a district basis after consultation with the district committees and others. The proposed development area does not contain forest land or coniferous forest: Napa County GIS Vegetation Layer, Zoning Layer and **Exhibit B-1**. The project site is zoned as AW and is not zoned as forest land as defined in Public Resource Code Section 12220(g), timberland as defined in Public Resource Code Section 4526, or a Timberland Production Zone as defined in Government Code Section 51104(g). Therefore, no impact would occur.
- e. Construction of the proposed vineyard would not result in the conversion of existing farmland or forestland in the area to non-agricultural use, and as indicated the proposed project would result in an increase in productive agricultural farmland on the project site and in the area. As such, the proposed project would have no impact on agricultural and forestry resources.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

² <https://maps.conservation.ca.gov/DLRP/CIFF/>

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| c) Expose sensitive receptors to substantial pollutant concentrations? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Discussion

See **Section VIII, Greenhouse Gas Emissions**, for the greenhouse gas, or GHG, emissions disclosures and impact assessments.

The Bay Area Air Quality Management District, or BAAQMD, has published CEQA guidance titled *BAAQMD CEQA Air Quality Guidelines*, referred to as CEQA Guidelines, to assist lead agencies in evaluating air quality and climate impacts from proposed land use projects and plans.³ The CEQA Guidelines are advisory for local and regional governments in the San Francisco Bay Area Air Basin, or SFBAAB. They contain nonbinding recommendations for how a lead agency can measure, evaluate, and mitigate air quality and GHG impacts generated from land use construction and operational activities.

The BAAQMD CEQA Guidelines do not replace the State CEQA Statute and Guidelines; rather, they are designed to provide BAAQMD-recommended procedures for evaluating potential air quality and climate impacts during the environmental review process that are consistent with CEQA requirements. The BAAQMD published its most recent update to the CEQA Guidelines on April 20, 2023, which is referred to as the 2022 CEQA Guidelines⁴. The 2022 Guidelines supersede BAAQMD’s previous CEQA guidance titled *BAAQMD CEQA Air Quality Guidelines*, 2017. The potential air quality impacts associated with construction and operation of the proposed project were evaluated consistent with BAAQMD’s 2022 CEQA Guidelines.

- a. The project site is generally located in the hills of the Western Mountains of the Napa Valley, within the Napa County climatological subregion of SFBAAB, which is under the jurisdiction of BAAQMD. The topographical and meteorological features of the Napa Valley subregion create the potential for air pollution. In the short term, potential air quality impacts are most likely to result from construction activities. Construction-related emissions, which are temporary in nature, mainly consist of particulate matter (PM) generated from fugitive dust during grading or other earthmoving activities and other criteria pollutants generated through the exhaust from construction equipment, vehicular haul and worker trips, and the burning of any project area vegetation⁵. In the long term, potential air quality impacts would likely result from ongoing activities associated with the operation and maintenance of the proposed vineyard. Operational-related emissions, which are seasonal in nature, are primarily generated from vehicular trips associated with workers traveling to and from the site, truck trips hauling harvested grapes, and use of equipment necessary for ongoing vineyard maintenance. Refer to **Section XVII (Transportation)** for the anticipated number of construction- and operation-related trips.

Ambient air quality standards have been established by State and federal environmental agencies for specific air pollutants most pervasive in urban environments. These pollutants are referred to as criteria air pollutants because the standards established for them were developed to meet specific health and welfare criteria set forth in the enabling legislation. Criteria air pollutants include ozone, carbon monoxide, nitrogen dioxide, sulfur dioxide, respirable particulate matter less than 10 microns in diameter, or PM₁₀, fine particulate matter less than 2.5 microns, or PM_{2.5}, and lead. Air basins, or portions thereof, are categorized as attainment, nonattainment or unclassified for each criteria air pollutant based on whether ambient air quality standards have been achieved. The SFBAAB is currently designated as a nonattainment area for the federal 8-hour ozone standard, State 1-hour and 8-hour ozone standards, State annual and 24-hour PM₁₀ standards, federal 24-hour PM_{2.5} standard and the State annual PM_{2.5} standard. Therefore, the criteria air pollutants of concern in the SFBAAB are reactive organic gases, or ROG, and oxides of nitrogen, or NO_x, which are referred to as ozone precursors, as well as PM₁₀ and PM_{2.5}.

Air quality attainment plans are required to be prepared for nonattainment areas both under federal and state law. The most recently adopted air quality plan to address nonattainment issues in the SFBAAB is the 2017 Bay Area Clean Air Plan (Clean Air Plan).⁶ The Clean Air Plan provides a regional strategy to protect public health and the climate by progressing toward attaining all state and federal air quality standards, eliminating health risk disparities from exposure to air pollution among Bay Area communities, transitioning the region to a post-carbon economy needed to achieve GHG reduction targets for 2030 and 2050, and providing a regional climate protection strategy that will put the Bay Area on a pathway to achieve those GHG reduction targets. The Clean Air Plan includes a wide range of control measures designed to decrease emissions of the air pollutants that are most harmful to SFBAAB residents, such as particulate matter, ozone, and

³ BAAQMD, 2023. *2022 California Environmental Quality Act Air Quality Guidelines*. April 2023. Available at <https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines>.

⁴ <https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines>

⁵ Assuming burning to be conservative.

⁶ BAAQMD, 2017. *Spare the Air, Cool the Climate*, Final 2017 Clean Air Plan. Adopted April 19, 2017. Available at https://www.baaqmd.gov/~media/files/planning-and-research/plans/2017-clean-air-plan/attachment-a_-_proposed-final-cap-vol-1-pdf.pdf?a=en.

toxic air contaminants, or TACs, reduce emissions of methane and other super-GHGs⁷ that are potent climate pollutants in the near-term, and decrease emissions of carbon dioxide by reducing fossil fuel combustion.⁸

The BAAQMD’s current guidance requires consideration of the following questions in determining whether a project is consistent with an air quality plan. A project would be considered to be consistent with the Clean Air Plan if:

- 1) The project supports the primary goals of the Clean Air Plan.
- 2) The project includes all applicable control measures from the Clean Air Plan.
- 3) The project does not disrupt or hinder implementation of any control measures in the Clean Air Plan.

The BAAQMD-recommended guidance for determining if a project supports the goals of the current Clean Air Plan is to compare project-estimated emissions with BAAQMD thresholds of significance. If a project’s emissions would not exceed the thresholds of significance after the application of all feasible mitigation measures, the project would be consistent with the goals of the Clean Air Plan. As indicated in the following discussion with regard to air quality impact Question b, the proposed project would result in less-than-significant impacts from construction and operation as the project would not generate criteria air pollutant emissions related to either construction or operation that would exceed the BAAQMD mass emissions thresholds of significance. Thus, the proposed project would not conflict with the goals of the Clean Air Plan.

The Clean Air Plan contains 85 control measures aimed at reducing air pollution in the SFBAAB, and projects that incorporate all feasible air quality plan control measures are considered consistent with the Clean Air Plan. Of these, the only control measure applicable to the proposed project is Transportation Control Measure TR22 that addresses emissions from construction equipment. Control measure TR22 uses various strategies to reduce emissions from construction and farming equipment (e.g., incentives for equipment upgrades and/ or use of renewable electricity and fuels). Since 2009, the BAAQMD has provided more than \$38 million to replace and/or upgrade hundreds of pieces of older, often uncontrolled equipment used in construction, cargo-handling and agricultural operations with newer units that have engines certified to the cleanest available standards. The proposed project would benefit from this ongoing program and would not conflict with its implementation. Therefore, the proposed project would not be inconsistent with nor hinder implementation of any of the Clean Air Plan control measures. Therefore, the proposed project would not conflict with or obstruct implementation of the Clean Air Plan. The impact would be less than significant.

- b. The 2022 BAAQMD Guidelines provide thresholds of significance for air quality impacts from both construction and operation. According to BAAQMD, a project would have a significant impact on air quality if emissions from construction or operation would exceed the thresholds of significance shown in **Table 4**.

Table 4 – BAAQMD Thresholds of Significance for Construction and Operation

Pollutant	Construction	Operation	Operation
	Average Daily (pounds per day)	Average Daily - pounds per day	Annual -tons per year
ROG	54	54	10
NO _x	54	54	10
PM ₁₀ ^a	82	82	15
PM _{2.5} ^a	54	54	10
Fugitive Dust	Construction Dust Ordinance or other best management practices.	Not applicable	Not applicable

^a Includes PM emissions from exhaust only. Source: BAAQMD CEQA Guidelines April 2023.

For construction-related emissions of fugitive dust, the BAAQMD recommends that lead agencies take a qualitative approach to determine impact significance; the CEQA Air Quality Guidelines state that a project would be considered to have a less-than-significant impact with regard to fugitive dust emissions of PM₁₀ and PM_{2.5} if BAAQMD Basic Construction Mitigation Measures are implemented during construction.

In order to assess potential air pollutant emissions from the proposed project, a review of the analysis of emissions associated with vineyard development/construction and operations performed for the CEQA analysis of three recent vineyard projects in Napa County was completed: Stagecoach North Vineyards⁹ for an approximately 91-acre vineyard development, KJS and Sorrento Vineyard¹⁰ for an approximately 98-acre vineyard development, and Le Colline Vineyards¹¹ for an approximately 28-acre vineyard development¹².

⁷ “Super-GHGs” are climate pollutants that have a powerful ability to contribute to global warming, such as methane, black carbon, and fluorinated gases.

⁸ BAAQMD, 2017. Spare the Air, Cool the Climate, Final 2017 Clean Air Plan. Adopted April 19, 2017. Available at https://www.baaqmd.gov/~media/files/planning-and-research/plans/2017-clean-air-plan/attachment-a_-_proposed-final-cap-vol-1-pdf.pdf?1a=en.

⁹ #P18-00446-ECPA, November 2022, SCH #2019100250

¹⁰ #P17-0432-ECPA, March 2023, SCH #2018092042

¹¹ #P14-00410-ECPA, December 2022, SCH #2016042030

¹² These EIRs are incorporated herein by reference and available for review in the Napa County Department of Planning, Building and Environmental Services permanent files.

All three vineyard projects involved similar activities associated with vegetation removal and land clearing, construction, and installation of vineyards as the proposed project. Construction emissions estimated for each of these projects were divided by the development area for each to derive an estimate of the pounds per acre per day for each criteria air pollutant. Construction emissions included emissions from the use of off-road equipment and construction vehicles.

Table 5 shows the approximate anticipated construction emissions associated with the development of vineyards of the sizes described above. Variations or similarities in construction emissions modeling results between the three projects can be attributed to the modeling platform and version used, and differences in modeling assumptions and inputs such as construction trips, construction equipment and duration of use/operation. Variations in operational emissions between the three projects can be attributed to the modeling platform and version used, and differences in modeling assumptions and inputs such as operational year and number of vehicle trips generated, level of off-road equipment use in operation, and the use of electric equipment and vehicles.

Table 5 – Emissions from Vineyard Development and Operation

Emissions and Thresholds	Construction Emissions ^A			
	ROG	NO _x	PM ₁₀	PM _{2.5}
Stagecoach North vineyard ^{1 B}	0.08	0.75	0.03	0.03
KJS and Sorrento vineyard ^{2 B}	0.05	0.42	0.02	0.02
Le Colline vineyard ^{3 B}	0.24	2.33	0.10	0.09
Average	0.12	1.17	0.05	0.05
Project Construction Emissions based on Average ^A	1.29	12.49	0.53	0.48
Construction threshold ^A	54	54	82	54
Significant?	No	No	No	No
Emissions and Thresholds	Operational Emissions ^{4, 5, A}			
Stagecoach North 91-acre vineyard operation ^{1 B}	0.01	0.08	0.01	<0.01
KJS and Sorrento 98-acre vineyard operation ^{2 B}	<0.01	<0.01	<0.01	<0.01
Le Colline 28.5-acre vineyard operation ^{3 B}	<0.01	<0.01	<0.01	<0.01
Average ^A	<0.01	0.03	<0.01	<0.01
Project Operational Emissions based on Average ^A	0.03	0.32	0.03	0.02
Operational threshold ^A	54	54	82	54
Significant?	No	No	No	No
Emissions and Thresholds	Operational Emissions ^{4 C}			
Stagecoach North 91-acre vineyard operation ^{1 C}	<0.01	0.01	<0.01	<0.01
KJS and Sorrento 98-acre vineyard operation ^{2 C}	<0.01	<0.01	<0.01	<0.01
Le Colline 28.5-acre vineyard operation ^{3 C}	<0.01	<0.01	<0.01	<0.01
Average ^C	<0.01	<0.01	<0.01	<0.01
Project Operational Emissions based on Average ^C	0.01	0.06	<0.01	<0.01
Operational threshold ^C	10	10	15	10
Significant?	No	No	No	No

Note: Totals may not add up due to rounding and the decimal place value of the various data/input sources and of the V-CESS Calculator.

- 1 As identified in Stagecoach North EIR
 - 2 As identified in KJS and Sorrento EIR
 - 3 As identified in Le Colline Vineyard EIR
 - 4 Includes dust and exhaust emissions
- A – Pounds per day
B – Pounds per acre per day
C – Tons per year

5 Calculation based on 365 days of operation. Project emissions are anticipated to be less than identified as vineyard operations are seasonal in nature.

Sources: Stagecoach North Vineyard EIR 2022; KJS and Sorrento Vineyard EIR 2023; Le Colline Vineyard Initial EIR 2023; BAAQMD, Vineyard Carbon Emissions Stock and Sequestration - V-CESS - Calculator, Napa County January 2026; CEQA Guidelines April 2023.

The proposed project would involve clearing existing vegetation, earthmoving and land contouring, and installation and maintenance of erosion control measures associated with the development of approximately 10.7 gross acres of vineyard. Vineyard construction is anticipated to generate up to 10 round trips per day including truck trips for equipment and supply delivery. Anticipated construction equipment is anticipated to include one or more of the following: bulldozer, excavator, small tractors including backhoe, dump truck, water truck, ATV, and other agricultural vehicles including passenger cars, trucks and vans.

Daily construction emissions associated with the proposed project's 10.7 gross acre vineyard development (±7.8 net-planted acres) were estimated using the average pounds per day estimated for the three vineyard projects described above and shown in **Table 5**. As shown in **Table 5**, short-term construction emissions associated with the proposed project would be well below the BAAQMD's daily construction thresholds.

Once completed, primary project operations would include activities such as vineyard pruning, weed and pest control, and harvest. Peak operations are anticipated to generate up to 20 round trips per day including grape haul truck trips. Anticipated equipment for vineyard operations is anticipated to include track and wheeled driven tractors and agricultural equipment including but not limited to grape haul trucks, backhoes or similar, flatbed and dump trucks, water trucks, ATVs, and other agricultural vehicles including passenger cars, trucks and vans. Vineyard operations would be similar to the other three vineyard projects discussed above and the project proposes to develop a

vineyard in a smaller area than the projects shown in **Table 5**. Therefore, operational emissions associated with the proposed project would be less than those shown in **Table 5** and well below both the daily and annual thresholds.

Additionally, project approval, if granted, would be subject to the standard Air Quality Conditions of Approval below, which includes standard air quality and construction best management practices (BMPs) consistent with BAAQMD measures identified in Table 5-2 of the BAAQMD CEQA Guidelines that would further reduce potential air quality impacts associated with construction and ongoing operation of the proposed project.

Air Quality – Conditions of Approval:

The owner/permittee shall implement the following air quality BMPs during construction activities and vineyard maintenance and operations:

- a. Post a publicly visible sign with the telephone number and person to contact at the lead agency regarding dust complaints. The BAAQMD's phone number shall also be visible.
- b. Water all exposed surfaces (e.g., parking areas, staging areas, soil piles, grading areas, and unpaved access roads) two times per day.
- c. Cover all haul trucks transporting soil, sand, or other loose material offsite.
- d. Remove all visible mud or dirt tracked onto adjacent public roads by using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- e. All vehicle speeds on unpaved roads shall be limited to 15 mph.
- f. All trucks and equipment, including their tires, shall be washed off prior to leaving the site.
- g. Idling times shall be minimized either by shutting off equipment when not in use or reducing the maximum idling time to five minutes (as required by state regulations). Clear signage shall be provided for construction workers at all access points.
- h. Water and/or dust palliatives shall be applied in sufficient quantities during grading and other ground disturbing activities onsite to minimize the amount of dust produced. Outdoor construction activities shall not occur when average wind speeds exceed 20 mph.
- i. All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified visible emissions evaluator. Any portable engines greater than 50 horsepower or associated equipment operated within the BAAQMD's jurisdiction shall have either a California Air Resources Board (ARB) registration Portable Equipment Registration Program (PERP) or a BAAQMD permit. For general information regarding the certified visible emissions evaluator or the registration program, visit the ARB FAQ¹³ or the PERP website¹⁴.

Installation of the proposed project is expected to generate emissions that are below the thresholds presented in **Table 5**, would contain other features that minimize fugitive dust (such as vineyard cover crop), and would introduce fewer new vehicle trips than the projects shown in **Table 5** during both installation and operation: see **Section XVII Transportation**, for anticipated project trips. Therefore, implementation and operation of the proposed project would result in less-than-significant air quality impacts and not result in cumulatively considerable effects.

- c-d. Land uses such as schools, playgrounds, childcare centers, hospitals and convalescent homes are considered sensitive to poor air quality, because infants and children, the elderly, and people with health afflictions, especially respiratory ailments, are more susceptible to respiratory infections and other air quality related health problems than the general public. Residential areas are also considered to be sensitive to air pollution because residents, which include children and the elderly, tend to be at home for extended periods of time.

The project site is located in a rural setting where surrounding parcels are generally undeveloped grasslands and woodlands interspersed with vineyards, wineries, and rural residences. The closest schools, Sunrise Montessori of Napa Valley, La Sagrada Familia Catholic International Home School Academy, and Unidos Middle School are all located approximately 3.5 miles south of the project site within the City of Napa (Napa County GIS, Schools Layer).. The closest offsite residence is located approximately 150 feet southeast of the project site, the next closest residence is located over 450 feet to the east.

The closest schools, Sunrise Montessori of Napa Valley, La Sagrada Familia Catholic International Home School Academy, and Unidos Middle School are all located over 4 miles south/southeast of the project site within the City of Napa (Napa County GIS, Schools Layer). The closest residences to the project site are located between 0.25 miles ($\pm 1,350$ feet) to the south and 0.35 miles ($\pm 1,800$ feet) to the west in the Dry Creek Valley.

During installation of the ECP, vineyard planting, and subsequent vineyard operations, TACs and odors would be created through the use of construction, grading, and farm equipment (e.g., tractors, trucks, bulldozers, and an excavator). These sources would occur approximately 4 miles from the closest schools, and over 0.25 miles from the closest residence. Because these sources are seasonal in nature or temporarily occur and that the closest sensitive receptors are over 0.25 miles and 4 miles from the project site, the proposed

¹³ http://www.arb.ca.gov/portable/perp/perpfaq_04-16-15.pdf

¹⁴ <http://www.arb.ca.gov/portable/portable.htm>

project would not expose sensitive receptors or a substantial number of people to pollutants or objectionable odors. Therefore, these impacts would be less than significant.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES. Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

The Biological Resources Reconnaissance Survey prepared by Wildlife Research Associates, dated October 2024 – **Exhibit B-1** – included site specific assessments conducted on April 23, May 9, and June 25, 2024, for biological resources present or potentially present in the project site. The surveys focused on the proposed development area and immediate surrounding habitat located within the project site and documented: the presence or potential for special-status plant and animal species and their habitats, potential substantial adverse effects on sensitive habitats or communities, potential impacts to federal or state protected wetlands and waters of the U.S., and interference with native wildlife species, wildlife corridors, or native wildlife nursery sites.

Prior to conducting the biological surveys, biological information for the project site was obtained from the following sources: the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDDB) (CDFW, 2024), California Native Plant Society Electronic Inventory (CNPS, 2024), and the U.S. Fish and Wildlife Service (USFWS) List of Federal Endangered and Threatened Species California Bird Species of Special Concern (USFWS, 2024). The CNDDDB and CNPS database searches included Chiles Valley, Kenwood, Rutherford, Yountville, Glen Ellen, Sonoma, and Napa USGS 7.5-minute quadrangles. The special-status wildlife evaluation considered database searches for the entirety of Napa County.

Field surveys were conducted by qualified biologists familiar with the resources of Napa County and surrounding counties, with the goal of identifying the presence of sensitive biological communities, the potential for biological communities on the site to support special-status plant and wildlife species, and the presence of any other sensitive natural resources protected by local, State, or federal laws and regulations. Botanical assessments followed protocols described in the *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* (CDFW, 2018), *Botanical Survey Guidelines of the California Native Plant Society* (CNPS, 2001), *The Jepson Manual* (Baldwin, 2012), and other relevant materials. Wildlife was identified by their sight, sign, or call. Field surveys were conducted identifying and recording all species in the proposed development area and in the near proximity.

The vegetation types within the holding include non-native annual grassland, coyote brush scrub, chamise chaparral, coast live oak woodland, knobcone pine woodland, Douglas fir forest, pond, seasonal wetland, and ruderal/developed land and other developed/disturbed lands. Vegetation types within development area includes non-native annual grassland, coyote brush scrub, coast live oak woodland, and ruderal/developed land: WRA October 2024 – **Exhibit B-1**. The proposed project would remove portions of the developed lands, non-native

annual grassland, coyote brush scrub, coast live oak woodland, and knobcone pine forest the vegetation types and their acreages for both existing and proposed conditions are shown in **Table 6**.

Table 6 – Vegetation Types in the Project Site and Proposed Development Area¹⁵

Vegetation Types	Approximate Pre-Project Acres in Project Site	Approximate Acres in Proposed Development Area
Coast Live Oak Woodland	72.4	3.8
Knobcone Pine Forest	3.8	0.1
Douglas Fir Forest	2.5	0.0
Coyote Brush Scrub	1.9	1.1
Chamise Chapparal	18.0	0.0
Non-native Annual Grassland	16.6	5.5
Seasonal Wetland	0.2	0.0
Man-made Pond	0.2	0.0
Developed - Ruderal	2.3	0.3
Total	117.9	10.8

Sources: WRA October 2024 – **Exhibit B-1**

- a. Special-Status Plants: Based upon a review of the biological resource databases listed in **Exhibit B-1**, 86 special-status plant species have been documented in the vicinity of the project site. Of those, 32 species have a moderate potential to occur and one species - *Ceanothus sonomensis*, Sonoma ceanothus – has a high potential to occur in the project site. The protocol-level plant surveys, which were timed to correspond to the period sufficient to observe and identify those special-status plants determined to have the potential to occur in the project site, did not observe or identify any special-status plant species in the project area, WRA October 2024 – **Exhibit B-1**.

The project as proposed would not remove special-status plants and/or populations, which is consistent with the following Napa County General Plan Conservation Element goals, policies, and Zoning Ordinance: General Plan Goal CON-3¹⁶, General Plan Policy CON-13¹⁷, and General Plan Policy CON-17.a¹⁸, and the purpose and intent of the Conservation Regulations (NCC Chapter 18.108) in that it preserves natural habitat or existing vegetation, and does not adversely affect sensitive, rare, threatened, or endangered plants.

Special-Status Wildlife: Based upon a review of the biological resource databases listed in **Exhibit B-1**, 59 special-status animal species have been documented to occur in Napa County. Of these special-status species 11 species: three mammals, five birds, two amphibians, and one reptile, as well as non-status birds protected under the MBTA and CFGC have a potential to occur in the project site.

White-tailed kites are resident in open to semi-open habitats throughout the lower elevations of California, including grasslands, savannahs, woodlands, agricultural areas, and wetlands. Vegetative structure and prey availability seem to be more important habitat elements than associations with specific plants or vegetative communities. Nests are constructed mostly of twigs and placed in trees, often at habitat edges. Nest trees are highly variable in size, structure, and immediate surroundings, ranging from shrubs to trees greater than 150 feet tall. This species preys upon a variety of small mammals, as well as other vertebrates and invertebrates. The proposed development area provides suitable year-round habitat for white-tailed kites, including stands of oaks for nesting and open areas in close proximity for foraging.

Olive-sided flycatcher - *Contopus cooperi*. CDFW Species of Special Concern. High Potential (Presence Unknown). This passerine bird is known from across Canada into the West Coast, Rocky Mountains, and Great Lake Area. They typically nest in coniferous or mixed forests, particularly lower montane forest. These birds forage for flying insects in forest openings, burns, edges, and other mixed open area in greater forest habitats. Nests are well-hidden in dense branches of large trees, preferentially conifer trees (Altman 2000). The trees within the Study Area may contain cavities or exfoliating bark suitable for roosting. A general nesting bird survey was not performed under this biological assessment. There were no observations of this species during the site visits; however, a protocol-level survey was not performed during this assessment.

¹⁵ The acreages identified in the project plans may slightly differ from acreages identified in the property's other various parcel and project reports and assessments, and associated CEQA disclosures/determinations due to the various mapping platforms, spatial characteristics, modeling data, and rounding utilized by the various preparers. Because approximate biological/plant communities, habitats, and project acreages have been corroborated through County GIS mapping, the values disclosed herein are considered by the County to be adequate for CEQA review, disclosure, and determination purposes of the subject application.

¹⁶ Goal Con-3: Protect the continued presence of special-status species, including special-status plants, special-status wildlife, and their habitats, and comply with all applicable state, federal, or local laws or regulations.

¹⁷ Policy Con-13: The County shall require that all discretionary residential, commercial, industrial, recreational, agricultural, and water development projects consider and address impacts to wildlife habitat and avoid impacts to fisheries and habitat supporting special-status species to the extent feasible. Where impacts to wildlife and special-status species cannot be avoided, projects shall include effective mitigation measures and management plans including provisions to: Provide protection for habitat supporting special-status species through buffering or other means.

¹⁸ Policy Con-17.a: Prevent removal or disturbance of sensitive natural plant communities that contain special-status plant species or provide critical habitat to special-status animal species.

American peregrine falcon - *Falco peregrinus*. State Endangered, CDFW Fully Protected Species. High Potential (Observed/Presence Unknown). American peregrine falcons occur throughout North America, with year-round occurrences along the coast and Klamath Range of California, and non-breeding in Central Valley and Sierra Nevada. They occur in grasslands, woodlands, and open forests. Nesting is on ledges of cliffs, transmission towers, quarry faces, skyscrapers, and bridges, and the nest is either one that has been abandoned by other birds or is scraped depression. Clutches range from two to five eggs, with only one brood a year. Falcons primarily hunt small birds, taking them on-the-wing, but also take bats, rodents, fish, and small raptors. There were no observations of this species during the site visits; however, a protocol-level survey was not performed during this assessment.

Purple martin - *Progne subis*. CDFW Species of Special Concern. Moderate Potential (Presence Unknown). Purple martin is an uncommon summer resident in California, occurring in woodlands and low-elevation hardwood and coniferous forest. It usually feeds on insects captured in flight approximately 100 to 200 feet above ground. These birds nest in cavities of tall, old, isolated trees or snags in open forest or woodland. The trees within the Study Area may contain cavities or exfoliating bark suitable for roosting. A general nesting bird survey was not performed under this biological assessment. There were no observations of this species during the site visits; however, a protocol-level survey was not performed during this assessment.

Black-chinned sparrow - *Spizella atrogularis*. Local Rare. Moderate Potential (Presence Unknown). Black-chinned sparrows are locally common residence of the dry scrublands, chaparrals, and mountain slopes of California up to 8,800 feet in elevation. This species breeds in California in the inner north and south Coast Ranges, Transverse Range, Peninsular Range, the western slopes of the Sierra Nevada, irregularly in the north Central Valley, and locally in the mountains of southeastern California (Tenney 1997). This species inhabits xeric slopes of dense scrub, chaparral, and sagebrush habitats dominated by ceanothus (*Ceanothus* spp.), manzanitas (*Arctostaphylos* spp.), sagebrush (*Artemisia* spp.), and chamise (*Adenostoma fasciculatum*) (Tenney 1997). There were no observations of this species during the site visits; however, a protocol-level survey was not performed during this assessment.

The pallid bat is a relatively common species of low elevations in California. The species occurs in a wide variety of habitats including grasslands, shrublands, woodlands, and forests; but it is most common in open, dry habitats with rocky areas for roosting. The species' day roosts are in caves, crevices, mines and hollow trees or buildings. Roosts must protect bats from high temperatures. Night roosts may be in more open sites. Tree roosting has been documented within snags, basal hollows of conifers, and within bole cavities in oak trees. Prey items are primarily insects and arachnids, including beetles, orthopterans, homopterans, moths, spiders, scorpions, solpugids, and Jerusalem crickets. The species mates from late October to February with maternity colonies forming in early April and young are born April through July, with most in May and June. Typically, young pallid bats have been observed flying in July and August. The species is also sensitive to disturbance of roosting sites. Trees within the proposed development area may contain cavities or snags suitable for roosting by this species.

Fringed myotis ranges through much of western North America from southern British Columbia, Canada, south to Chiapas, Mexico and from Santa Cruz Island in California, east to the Black Hills of South Dakota. This species is found in desert scrubland, grassland, sage-grass steppe, old growth forest, and subalpine coniferous and mixed deciduous forest. Oak and pinyon-juniper woodlands are most commonly used by this species. The fringed myotis roosts in colonies from 10 to 2,000 individuals, although large colonies are rare. Caves, buildings, underground mines, rock crevices in cliff faces, and bridges are used for maternity and night roosts, while hibernation has only been documented in buildings and underground mines. Tree-roosting has also been documented in Oregon, New Mexico, and California. The trees within the proposed development area may contain cavities or exfoliating bark suitable for roosting.

The long-legged myotis ranges across western North America from southeastern Alaska to Baja California and east to the Great Plains and central Texas. This species is usually found in coniferous forests but also occurs seasonally in riparian and desert habitats. They use abandoned buildings, cracks in the ground, cliff crevices, exfoliating tree bark and hollows within snags as summer day roosts. Caves and mines are used as hibernation roosts. Long-legged myotis forage in and around the forest canopy and feed on moths and other soft-bodied insects. The trees within the proposed development area may contain cavities or exfoliating bark suitable for roosting.

Western pond turtle - *Emys marmorata*. CDFW Species of Special Concern. Moderate Potential (Presence Unknown). Western pond turtle is the only native freshwater turtle in California. This turtle is uncommon to common in suitable aquatic habitat throughout California, west of the Sierra-Cascade crest and Transverse Ranges. Western pond turtles inhabit perennial aquatic habitats, such as lakes, ponds, rivers, streams, and canals that provide submerged cover and suitable basking structures, such as rocks and logs (Zeiner et. al. 2000). Western pond turtles prefer to nest on unshaded upland slopes close to their aquatic habitat, and hatchlings require shallow water with relatively dense emergent and submergent vegetation for foraging for aquatic invertebrates (Jennings and Hayes 1994). There were no observations of this species during the site visits; however, a protocol-level survey was not performed during this assessment.

Foothill yellow-legged frog -*Rana boylei*. CDFW Species of Special Concern. Moderate Potential (Presence Unknown without Impact). The foothill yellow-legged frog (FYLF) historically occurred in coastal and mountain streams from southern Oregon to Los Angeles County but has declined in many parts of this range. This species is strongly associated with rivers and perennial creeks, and prefers shallow, flowing water with a rocky substrate. FYLF individuals do not typically move overland and are rarely observed far from a source of permanent water (typically less than ten feet). Aquatic breeding sites are in-stream, often near confluences, with eggs typically deposited behind or sometimes under rocks in low-flow areas with cobble and/or gravel (Thomson et al. 2016). Metamorphosis takes at least 15 weeks. The lower reach of the intermittent stream within the Study Area provides a rocky substrate and may be occupied when the stream is flowing; any individuals present would presumably retreat downstream when flow ceases. Breeding within the stream is unlikely given the limited water depth and intermittent nature of the flow. There were no observations of this species during the site visits; however, a protocol-level survey was not performed during this assessment.

California red-legged frog -*Rana draytonii*. Federal Threatened Species, CDFW Species of Special Concern. Moderate Potential (Presence Unknown). The California red-legged frog is dependent on suitable aquatic, estivation, and upland habitat. During periods of wet weather, starting with the first rainfall in late fall, red-legged frogs disperse away from their estivation sites to seek suitable breeding habitat. Aquatic and breeding habitat is characterized by dense, shrubby, riparian vegetation and deep, still or slow-moving water. Breeding occurs between late November and late April. California red-legged frogs estivate (period of inactivity) during the dry months in small mammal burrows, moist leaf litter, incised stream channels, and large cracks in the bottom of dried ponds. There were no observations of this species during the site visits; however, a protocol-level survey was not performed during this assessment.

The special-status bat and bird species identified above have the potential to be impacted during tree removal during project construction. Further, in addition to the special-status bird species discussed above, other migratory birds and raptors protected by the Migratory Bird Treaty Act and California Fish and Wildlife Code may also nest onsite, as the project site contains a variety of nesting habitat. Temporary and intermittent increases in noise levels during construction may cause nest abandonment and death of young or loss of reproductive potential at active nests located near project activities. These are considered potentially significant impacts.

To reduce potentially direct and indirect significant impacts on special-status and protected bird species, and to special-status bat species as a result of project tree removal to a less-than-significant level, **Mitigation Measure BIO-1** and **BIO-2** will be implemented. These measures will require preconstruction surveys for nesting birds and a two-phase removal process for identified bat habitat trees.

While 11 of the approximate 365 trees to be removed have been identified as potential bat habitat trees, the age cohorts of the woodlands are consistent throughout the subject property, with numerous large, old trees present outside of the proposed project area. The oak woodland and associated canopy provides cover, nesting, and foraging resources for a variety of woodland birds and small mammals, including several trees with substrate that may provide maternity roosting for bats and granary habitat for woodpeckers and squirrels: there are no granaries trees in the Project Area. The woodlands within the proposed project area are not substantively different from those located outside of the Project Area. The remainder woodlands will continue to provide nesting, foraging, and cover resources for local wildlife, particularly birds and bats. Therefore, the proposed project is anticipated to have a less than significant cumulative impact on potential habitat on special-status bat species and associated habitat trees.

Mitigation Measure BIO-1: The owner or permittee shall revise Erosion Control Plan #P25-00029-ECPA prior to approval to include the following measures to minimize impacts associated with the potential loss and disturbance of special-status and nesting birds and raptors consistent with and pursuant to California Fish and Game Code Sections 3503 and 3503.5:

- a. For earth-disturbing activities occurring between February 1 and August 31 (which coincides with the grading season of April 1 through September 15 – NCC Section 18.108.027(C), and bird breeding and nesting seasons), a qualified biologist (defined as knowledgeable and experienced in the biology and natural history of local avian resources with the potential to occur at the project site) shall conduct a preconstruction surveys for nesting birds within all suitable habitat on the development area, and where there is potential for impacts adjacent to the development area (typically within 500 feet of project activities). The preconstruction survey shall be conducted no earlier than 7 days prior to when vegetation removal and ground disturbing activities are to commence. Should ground disturbance commence later than 7 days from the survey date, surveys shall be repeated. A copy of the survey shall be provided to the Napa County Conservation Division and CDFW prior to commencement of work.
- b. After commencement of work if there is a period of no work activity of 7 days or longer during the bird breeding season, surveys shall be repeated to ensure birds have not established nests during inactivity.
- c. In the event that nesting birds are found, the owner/permittee shall identify appropriate avoidance methods and exclusion buffers in consultation with the County Conservation Division and the U.S. Fish and Wildlife Service (USFWS) and/or CDFW prior to initiation of project activities. Exclusion buffers may vary in size, depending on habitat characteristics, project activities/disturbance levels, and species as determined by a qualified biologist in consultation with County Conservation Division and the USFWS and/or CDFW.

- d. Exclusion buffers shall be fenced with temporary construction fencing (or the like), the installation of which shall be verified by Napa County prior to the commencement of any earthmoving and/or development activities. Exclusion buffers shall remain in effect until the young have fledged or nest(s) are otherwise determined inactive by a qualified biologist.
- e. Alternative methods aimed at flushing out nesting birds prior to preconstruction surveys, whether physical, audible, or chemical would be considered an impact to nesting birds and is prohibited. Any act associated with flushing birds from project areas should undergo consultation with the USFWS or CDFW prior to any activity that could disturb nesting birds.

Mitigation Measure BIO-2: The owner or permittee shall revise Erosion Control Plan #P25-00029-ECPA prior to approval to include the following measures to minimize impacts associated with the potential loss and disturbance of special-status bat species:

- a. Prior to the commencement of earth-disturbing activities and tree removal a qualified biologist, having at least two years of experience conducting bat surveys that resulted in detections for relevant species, and experience with removal of bat habitat trees, shall clearly mark the bat habitat trees identified in the WRA May 2025 response letter for the project for construction personnel and instruct them on the phased tree removal specified in **Mitigation Measure BIO-2.b**. The owner or permittee shall provide documentation to the Planning Department that bat habitat trees have been marked prior to the commencement of earth-disturbing activities and tree removal.
- b. Bat habitat trees shall be trimmed and removed in a two-phased system conducted over two consecutive days. The first day (in the afternoon, under the direct supervision and instruction of a qualified biologist with experience conducting two-step tree removal, limbs and branches will be removed by a tree cutter using chainsaws only. Limbs with cavities, crevices and deep bark fissures will be avoided, and only branches or limbs without those features will be removed. On the second day, the entire tree will be removed. All felled trees shall remain on the ground for at least 24 hours prior to disposal to allow any present bats within the trees to escape.

Regarding the Western pond turtle, Foothill yellow-legged frog, and the California red-legged frog their potential habitats do not occur within the project area and any potential habitat, which is associated with the closest unnamed blue-line stream to the project site, is located at least 65-feet from the project area at its closest point, and continues to trend away from the project in a southeast direction: see Plan Sheet 1 of **Exhibit A**. Therefore, no potentially significant impacts are anticipated to occur to these special-status amphibian and reptile species.

- b-c. No wetlands or riparian vegetation habitat has been identified in the project area: WRA October 2024 – **Exhibit B-1**. There is a series of small wetland features in the southern end of the property: the project has been designed to avoid these potential wetland features and provided them with a minimum 50-foot setbacks consistent with NCC section 18.108.026 - General provisions, wetlands.

Hopper Creek, a U.S. Geological Survey (USGS) blue-line stream is located approximately 0.25 miles ($\pm 1,350$ feet) north of the project site. Two unnamed blue-line tributaries to Dry Creek are located approximately 0.15 miles (± 800 feet) to the west of the site, the other is within the project site located 65 feet from the project area: **Figure 1** and **Exhibit A**. There are three other minor ephemeral drainages located adjacent to the project area that are associated with this unnamed blue-line stream.

As designed the project would avoid all ephemeral and blue-line streams generally providing them with 50 foot or greater setbacks, except for portions of a somewhat disconnected ephemeral drainage located between proposed Vineyard Blocks 3 and 5 and south of Block 2, which are provided with 35-foot setbacks. Stream setbacks of the proposed project are consistent and compliant NCC section 18.108.025 - General provisions, intermittent and perennial streams.

Additionally, the proposed project has also been designed to maintain or reduce existing soil loss and hydrologic and runoff characteristics resulting in no net increase in soils loss or runoff as compared to existing conditions to further protect water quality and aquatic resources.

Therefore, the proposed project would not result in a significant impact to riparian habitat, wetlands or other sensitive natural communities.

- d. The project site is not within either a Natural Landscape Block or an Essential Connectivity Area, and no wildlife nursery sites were identified in the project site, WRA, October 2024 – **Exhibit B-1**.

The proposed project maintains substantial woodland and forest between the various vineyard blocks allowing for continued wildlife movement at the localized and regional scale through the property. Additionally, as detailed in the Background Section on page 3 of this Initial Study, the proposed project was redesigned to remove a proposed vineyard block located between Vineyard Blocks 4 and 7 that was identified as Vineyard Block 6 to preserve and maintain a substantial wildlife movement corridor through the holding in an east west direction, with a minimum width of approximately 250 feet. Most of the site will remain undeveloped, including the bulk of the site's chaparral, woodland, and forest. More specifically, the remnant habitats will remain connected, resulting in direct connectivity with similar habitats within the project site as well as between neighboring properties, which are largely undeveloped to the east, west and south.

For these reasons, the proposed project is not anticipated to result in less than significant impacts to wildlife movement and use. Wildlife nursery sites were not identified in the project site, therefore there would be no impacts to wildlife nursery sites.

To ensure that wildlife exclusion fencing is installed in a manner that is consistent with CDFW recommendations the following conditions shall be implemented, should the project be approved.

Fencing – Conditions of Approval:

The owner/permittee shall revise Erosion Control Plan #P25-00029-ECPA prior to approval to include a Vineyard Fencing Plan. The Vineyard Fencing Plan shall be submitted to the Planning Department for review and approval prior to its incorporation into #P25-00029-ECPA, and include the following components:

- a. New fencing shall use a design that has 6-inch square gaps at the base (instead of the typical 3-inch by 6-inch rectangular openings) to allow small mammals to move through the fence.
 - b. Exit gates shall be installed at the corners of deer fencing to allow trapped wildlife to escape. Smooth wire instead of barbed wire shall be utilized to top wildlife exclusion fencing to prevent entanglement.
 - c. Any modifications to the location of wildlife exclusion fencing as specified in Erosion Control Plan #P25-00029-ECPA pursuant to the Vineyard Fencing Plan required by this condition shall be strictly prohibited and would require County review and approval to ensure the modified wildlife exclusion fencing location/plan would not result in potential impacts to wildlife movement.
- e. The project has a zoning designation of Agricultural Watershed and is therefore subject to the vegetation canopy cover retention requirements and removal mitigation required pursuant to NCC Section 18.108.020.C through E. The project is also subject to General Plan Conservation Element Policy CON-24 regarding oak woodland habitat.

Oak woodland is the most common land cover in the County occurring on approximately 167,000-acres (33% of the County's area). Approximately 733-acres of oak woodland or 0.5% of the total area of oak woodland in the County has been cleared for residential and agricultural purposes between 1993 and 2002 (Napa County Baseline Date Report, Biological Resources Section, pages 4-22 and 4-25, Version 1, November 2005). While oak woodlands may be one of the most common land covers within the County, their past conversion to residential and agricultural uses in conjunction with foreseeable oak woodland conversion to agricultural use is considered a potentially significant impact on both a project-specific level and a cumulative level (Napa County General Plan, Draft Environmental Impact Report, Volume 1, Section 5.4 Biological Resources, Pacific Municipal Corporation, February 2007).

Policy CON-24 requires that oak woodland be maintained to provide oak woodland and wildlife habitat, slope stabilization, soil protection and species diversity. Policy CON-24c specifically calls for the preservation of oak woodland, on an acreage basis, at a 2:1 ratio to the extent feasible. Where preservation/avoidance of oak woodland is not feasible, replacement of oak woodland at a 2:1 ratio is required. Removal of more than 1-acre of oak woodland for every 2-acres preserved would be a significant impact in that it would be inconsistent with Policy CON-24.c.

The project site contains approximately 72.4-acres of coast live oak woodland, 3.8-acres of which are proposed for removal because of the project. Therefore, up to approximately 24-acres of oak woodland could be removed, or at least approximately 48-acres of oak woodland would need to be preserved, to comply with Policy CON 24.c. The project proposes removal of approximately 3.8-acres of oak woodland. Therefore, the project would be consistent and compliant with Policy CON24.c. **Mitigation Measure BIO-3** will include provisions to permanently preserve 7.6-acres of oak woodland to provide consistency with Policy CON-24.c.

Because the project site is within the Agricultural Watershed zoning district the proposed project must retain at least 70% of the vegetation canopy cover¹⁹ based on the on-site canopy present on June 2016 pursuant to NCC Section 18.108.020.C - General Provisions, Vegetation Retention Requirements. While a small portion of the eastern end of the development area where proposed Vineyard Blocks 1 and 2 are located and encompassing approximately 2.5-acres were burned in the 2006 Napa Fire, which would allow those areas to base their vegetation canopy cover analysis on the June 2018 conditions pursuant to NCC Section 8.80.130 as amended through Urgency Ordinance No. 1463, this analysis is based entirely on the 2016 conditions.

Approximately 78.5 acres of vegetation cover canopy existed in the project holding in 2016, which includes the coast live oak and knobcone pine forest. The proposed project would remove approximately 3.8-acres retaining approximately 74.3 acres, or 95%, of the vegetation canopy cover that existed in 2016: see Figures A-2 and A-3 of **Exhibit B-1**. Therefore, the proposed project is consistent with NCC Section 18.108.020.C, which requires a minimum of 70% preservation.

Specific to vegetation removal mitigation and preservation NCC Section 18.108.020.D - Vegetation Removal Mitigation – which requires that the removal of any vegetation canopy cover in the Agricultural Watershed zoning district be mitigated by permanent replacement or preservation of comparable vegetation canopy cover, on an acreage basis at a minimum 3:1 ratio. NCC 18.108.020.D prioritizes where the mitigation replacement and preservation areas should be allowed, whereby the first priority is for onsite replacement and or preservation areas that occur on slopes of 30% or less and outside of stream and wetland setbacks, also termed developable lands. NCC Section 18.108.020.E - Preserved Vegetation Canopy Cover - requires preserved vegetation canopy cover to be protected, or otherwise

¹⁹ Napa County Code Section 18.108.030 defines Vegetation Canopy Cover as the biotic communities classified as oak woodland, riparian oak woodland, or coniferous forest based on the current Manual of California Vegetation (MCV) and as described in the Napa County Baseline Data Report 2005, or as amended.

enforceable restricted, through a perpetual protective easement or deed restriction preserving and conserving the preserved vegetation canopy cover in perpetuity.

As proposed, the project would remove 2.3-acres of developable vegetative canopy cover and retain 4.6-acres: there is approximately 6.9-acres of developable canopy cover on the project site – see Appendix C of **Exhibit A**. For the proposed project to comply with NCC Section 18.108.020.D and preserve 3 acres of developable canopy cover for every acre of developable cover canopy removal is limited to approximately 1.7-acres. Therefore, the project is not content with NCC Section 19.108,020.D, which is considered a potentially significant impact. To reduce this impact to a less than significant level and achieve consistency with the vegetation canopy cover requirements, **Mitigation Measure BIO-3** will be implemented. This measure will require that 0.5-acres of developable vegetation cover canopy be removed for the proposed project area and placed into a preservation area that includes no less than 5.1-acres of developable canopy cover and no less that 7.6-acres of oak woodland overall, and include permeant preservation of the area to reduce impacts on vegetation canopy cover to a less-than-significant level and comply with NCC Section 18.108.020,D and Policy CON-24c.

Mitigation Measure BIO-3: The owner or permittee, prior to approval, shall implement the following measures to minimize impacts to vegetation cover canopy, oak woodlands and associated habitat:

- a. Revise #P25-00029-ECPA prior to approval to avoid 0.5-acres of developable vegetation canopy cover and include it in the Preservation Area in **Mitigation Measure BIO-3b**. The locations of associated wildlife exclusion fencing affected by this measure shall also be revised to accordingly. The area to be removed from the project and added to the preservation area and fencing location shall be reviewed and approved by the PBES Director prior to incorporation into the ECPA.
- b. Revise Figure 1 of Appendix C in Exhibit A - Tree Preservation – to provide a Preservation Area, totaling no less than 5.1-acres of developable vegetation canopy cover and no less than 7.6-acres of oak woodland, cumulatively, to be designated as such in a deed restriction or mitigation easement or other means of permanent protection acceptable to the County, that shall include canopy cover avoided as a result of **Mitigation Measure BIO-1a**. Land placed in protection shall be restricted from development and other uses that would degrade the quality of the habitat, including but not limited to conversion to other land uses such as agriculture or urban development and excessive off-road vehicle use that increases erosion, and should be otherwise restricted by the existing goals and policies of Napa County. The owner/permittee shall record the deed restriction or mitigation easement prior to construction or within 90 days of project approval, whichever comes first
- c. Prior to any earthmoving activities temporary fencing shall be placed at the edge of the dripline of trees to be retained that are located adjacent to the proposed development area (typically within approximately 50 feet of the proposed development area). The precise locations of said fences shall be inspected and approved by the Planning Division prior to the commencement of any earthmoving activities. No disturbance, including grading, placement of fill material, storage of equipment, etc. shall occur within the designated protection areas for the duration of erosion control plan and vineyard installation.
- d. The owner/permittee shall refrain from severely trimming the trees (typically no more than 1/3rd of the canopy) and vegetation to be retained adjacent to the proposed development area.
- e. In accordance with County Code Section 18.108.100 - Erosion hazard areas, Vegetation preservation and replacement - trees that are inadvertently removed that are not within the boundary of the project and/or not identified for removal as part of #P25-00029-ECPA shall be replaced on-site with fifteen-gallon trees at a ratio of 2:1 at locations approved by the planning director. A replacement plan shall be prepared for county review and approval that includes at a minimum, the locations where replacement trees will be planted, success criteria of at least 80%, and monitoring activities for the replacement trees. The replacement plan shall be implemented before vineyard planting activities. Any replaced trees shall be monitored for at least three years to ensure an 80% survival rate. Replacement trees shall be installed and documented that they are in good health prior to completion and finalization of the erosion control plan.

f. There are no Habitat Conservation Plans, Natural Community Conservation Plans, or other similar plans applicable to the project site. Therefore, no impact would occur.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

See **Section XVIII, Tribal Cultural Resources**, for disclosures and the impact assessment pursuant to Public Resources Code 21080.3.1, also known as Assembly Bill 52 - Gatto.

A Cultural Resource Reconnaissance of the project areas was conducted by Flaherty Cultural Resource Service, August 2, 2024, which included a check of information on file with the regional office of the California Historical Resources Information System (CHRIS) and consultation with the Native American Heritage Commission for a search of the Sacred Lands File to determine presence or absence of previously recorded historic or prehistoric cultural resources; a check of relevant historic references to determine the potential for historic era archaeological deposits or structures; and a surface reconnaissance survey of all accessible parts of the proposed development area to locate any visible signs of potentially significant historic or prehistoric cultural deposits.

- a-b. The Cultural Resource Reconnaissance did not identify any significant or potentially significant cultural resources in the proposed development area. While no cultural resources were found, there is the possibility that buried archaeological deposits could be present and accidental discovery could occur. Therefore, the proposed project would be subject to the standard conditions of approval identified below to protect cultural resources that may be discovered accidentally.
- c. The cultural resources study did not locate any human remains in the proposed development area and does not anticipate the discovery of human remains due to implementation of the proposed project. Therefore, impacts on human remains are anticipated to be less than significant. Furthermore, the following conditions of approval would be incorporated should the proposed project be approved, which would ensure that potential impacts on human remains would be less than significant.

Cultural Resources – Conditions of Approval:

Discovery of cultural, historical or archaeological resources, or human remains during construction, grading, or other earth moving activities:

- a. In accordance with CEQA Subsection 15064.5(f), should any previously unknown historic or prehistoric resources, including but not limited to charcoal, obsidian or chert flakes, grinding bowls, shell fragments, bone, pockets of dark, friable solids, glass, metal, ceramics, wood or similar debris, be discovered during grading, trenching or other onsite excavation(s), earth work within 100-feet of these materials shall be stopped until a professional archaeologist certified by the Registry of Professional Archaeologists has had an opportunity to evaluate the significance of the find and suggest appropriate mitigation(s), as determined necessary.
- b. If human remains are encountered the Napa County Coroner shall be informed to determine if an investigation of the cause of death is required and/or if the remains are of Native American origin. Pursuant to Public Resources Code Section 5097.98, if such remains are of Native American origin the nearest tribal relatives as determined by the State Native American Heritage Commission shall be contacted to obtain recommendations for treating or removal of such remains, including grave goods, with appropriate dignity.
- c. All persons working onsite shall be bound by contract and instructed in the field to adhere to these provisions and restrictions.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. ENERGY. Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

Consistent with Public Resources Code Section 21100(b)(3), this impact analysis evaluates the potential for the proposed project to result in a substantial increase in energy demand and wasteful use of energy during project construction, operation and maintenance. The impact analysis is informed by Appendix G of the CEQA Guidelines. The potential impacts are analyzed based on an evaluation of whether construction and operation energy use estimates for the proposed project would be considered excessive, wasteful, or inefficient.

- a. During construction of the proposed project, the use of construction equipment, truck trips for hauling materials, and construction workers' commutes to and from the project site would consume fuel. Project construction is anticipated to occur over six months in one phase. Construction activities and corresponding fuel energy consumption would be temporary and localized. In addition, there are no unusual project characteristics that would cause the use of construction equipment or haul vehicles that would be less energy efficient when compared with other similar agricultural construction sites within Napa County.

Once construction is complete, equipment and energy use would be slightly higher than existing levels and the proposed project would not include any unusual maintenance activities that would cause a significant difference in energy efficiency compared to the surrounding developed land uses. Thus, the proposed project would not result in wasteful, inefficient, or unnecessary energy use. This impact would be less than significant.

- b. The transportation sector is a major end-user of energy in California, accounting for approximately 28% of total statewide energy consumption in 2019: U.S. Energy Information Administration 2020. In addition, energy is consumed in connection with construction and maintenance of transportation infrastructure, such as streets, highways, freeways, rail lines, and airport runways. California’s 30 million vehicles consumed more than 13 billion gallons of gasoline and more than 3 billion gallons of diesel each year: CEC 2024. In Napa County, farm equipment, not including irrigation pumps, accounted for approximately 60% of agricultural emissions in 2014, with the percentage anticipated to increase through 2050: (Napa County Revised Draft Climate Action Plan, July 2018.

With respect to transportation energy, existing energy standards are promulgated through the regulation of fuel refineries and products such as the Low Carbon Fuel Standard, or LCFS, which mandated a 10% reduction in the non-biogenic carbon content of vehicle fuels by 2020. Additionally, there are other regulatory programs with emissions and fuel efficiency standards established by United States Environmental Protection Agency and the California ARB such as Pavley II/LEV III from California’s Advanced Clean Cars Program and the Heavy-Duty, Tractor-Trailer, GHG Regulation. Further, construction sites would need to comply with State requirements designed to minimize idling and associated emissions, which also minimizes use of fuel. Specifically, idling of commercial vehicles and off-road equipment would be limited to five minutes in accordance with the Commercial Motor Vehicle Idling Regulation and the Off-Road Regulation.¹³ The proposed project would comply with these State requirements and the Air Quality conditions of approval presented in **Section III Air Quality**. Napa County has not implemented an energy action plan. Therefore, the proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency or impede progress towards achieving goals and targets, and impacts would be less than significant.

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

¹³ California Code of Regulations, 2005. Title 13, Chapter 10, 2485, updated through 2014.

- f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Discussion

- a. The project site could experience potentially strong ground shaking and other seismic related hazards based on the number of active faults in the San Francisco Bay region. The proposed project consists of earthmoving activities associated with the installation of erosion control measures for agricultural development but does not include the construction of new residences or other facilities (i.e., enclosed areas where people can congregate) that would be subject to seismic forces. Additionally, the proposed project would not result in a substantial increase in the number of people to the site. Therefore, the proposed project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving fault rupture, ground shaking, liquefaction, and landslides and impacts would be less than significant. Additional information supporting this conclusion is identified below.
- i) The project site is not located within an Earthquake Fault Hazard Rupture Zone designated by the Alquist-Priolo Earthquake Zoning Act. The nearest known fault is West Napa Fault located approximately 1.75 miles east of the project site: Napa County GIS West Napa Fault and AP fault traces layers. Given the agricultural nature of the proposed project, it would not directly or indirectly cause potential substantial adverse effects involving fault rupture and impacts would be less than significant.
 - ii) Although the project site is in an area that may be subject to moderate to strong seismic ground shaking potential during an earthquake -California Geological Survey, 2016 - the proposed project does not include construction of any new residences or enclosed areas where people would congregate. Therefore, the project would not contribute to an increased risk of loss, injury or death involving seismic ground shaking. This impact would be less than significant.
 - iii) The project site is not in an area subject to high liquefaction potential: the project site is in an area mapped with a very low potential liquefaction potential: Napa County GIS Liquefaction layer. Further, as noted above, the proposed project would not result in a substantial increase in the number of people or add structures onsite. Therefore, this impact would be less than significant.
 - iv) There are no landslides or landslide deposits mapped in the project area: Napa County GIS, Landslide line and polygon layers. Given the agricultural nature of the proposed project and the proposed erosion and runoff control measures, the proposed project would not directly or indirectly cause potential substantial adverse effects involving landslide potential; a less-than-significant impact would occur: also see Question c below for additional discussion.
- b. Soils in the project site include Felton gravelly loam, Soil Series #136, Lodo-Maymen-Felton association, Soil Series #157, and Sobrante loam, Soil Series #179: Soil Survey of Napa County, USDA 1978, and **Exhibits A and B-1**. The development area consists exclusively of Felton gravelly loam - **Exhibit A**. Installation and implementation of the proposed project would involve vegetation removal and earthmoving activities within the proposed development area. Pursuant to NCC Section 18.108.070.L, Erosion Hazard Areas, earth-disturbing activities, other than installation of winterization measures, cannot be performed between October 15 and April 1. These activities would take place during the dry season when rainstorms are less likely, resulting in negligible erosion and sedimentation during project installation and operation.

Soil loss calculations were prepared using the Universal Soil Loss Equation, or USLE, to evaluate potential effects of erosion because of the proposed project. The USLE model evaluates the environmental conditions and physical forces that lead to the detachment and potential movement of soil particles through surface erosion. The USLE model does not describe travel distances of soil particles once dislodged. Potential soil loss and sedimentation associated with the proposed vineyard development and operation would primarily be controlled through a cover crop minimum vegetative cover density of 80%. Details of the proposed erosion control measures are provided in the Erosion Control Plan and Soil Loss modeling prepared by PPI Engineering - **Exhibit A and Exhibit C**. Vineyard cover crops provide the ability to entrap eroded soils onsite, thereby reducing soil loss and sedimentation potential.

Based on USLE modeling calculations prepared by PPI Engineering, January 2025 - **Exhibit C**, the proposed conversion of approximately 10.7 gross acres of vegetation to vineyard is anticipated to reduce soil loss, or surface erosion, within the project site as compared to existing conditions: see **Table 7**. Under existing conditions, the annual soil loss is anticipated to total 27.25 tons per year across the proposed development area depending on soil type, slope length, and gradient. Under proposed project conditions, annual soil loss is anticipated to total 20.84 tons per year, or a reduction of approximately 22.9% as compared to existing conditions.

Table 7 – USLE Soil Loss Analysis

Proposed Vineyard Block	Pre-project Soil Loss (tons/year)	Post-project Soil Loss (tons/year)	Difference	Percent Change (approximate)
1	2.21	1.71	-0.49	-22.2%
2	3.70	2.69	-1.02	-27.6%
3	8.33	6.47	-1.86	-22.3%
4	8.37	6.38	-2.00	-24.0%
5	0.89	0.72	-0.17	-19.1%
7	1.23	0.92	-0.31	-25.2%
8	1.77	1.34	-0.43	-24.3%
9	0.49	0.40	-0.09	-18.4%
Total¹	27.25	20.84	-6.41	-22.9%

1. Individual estimates may not add to the exact totals identified due to rounding within the USLE model.
 Source: PPI Engineering January 29, 2025, Soil Loss Analysis – **Exhibit C**

Other proposed erosion control features that are anticipated to further reduce potential soil loss because of the proposed project, including soil loss experienced during vineyard and cover crop development and establishment, consist of water bars, straw wattles, straw mulching, and other practices as needed.

Should the proposed project be approved, the following conditions of approval would be incorporated to ensure that erosion control measures are installed according to plan specifications.

Erosion and Runoff Control Installation and Operation – Conditions of Approval:

The following conditions shall be incorporated by reference into Erosion Control Plan #P25-00029-ECPA pursuant to NCC Chapter 18.108 (Conservation Regulations):

- a. Permanent Erosion and Runoff Control Measures: Pursuant to NCC Section 18.108.070(L) installation of erosion, runoff, and sediment attenuation devices and hydromodification facilities including but not limited to straw wattles, repair/reconstruction and maintenance of existing diversion ditches, rock level spreader, diversion ditches, drop inlets and associated subsurface drainage lines, rock aprons and rock protected outfalls, and permanent no-till cover crop (or adequate mulch cover), shall be installed no later than October 15 during the same year that initial vineyard development occurs. This requirement shall be clearly stated on the final Erosion Control Plan. Additionally, pursuant to NCC Section 18.108.135 “Oversight and Operation” the qualified professional that has prepared this erosion control plan (#P25-00029-ECPA) shall oversee its implementation throughout the duration of the proposed project, and that installation of erosion control measures, sediment retention devices, and hydromodification facilities specified for the vineyard have been installed and are functioning correctly. Prior to the first winter rains after construction begins, and each year thereafter until the proposed project has received a final inspection from the county or its agent and been found complete, the qualified professional shall inspect the site and certify in writing to the planning director, through an inspection report or formal letter of completion verifying that all of the erosion control measures, sediment retention devices, and hydromodification facilities required at that stage of development have been installed in conformance with the plan and related specifications, and are functioning correctly.
- b. Cover Crop Management/Practice: The permanent vineyard cover crop shall not be tilled (i.e., shall be managed as a no-till cover crop) for the life of the vineyard and the owner/permittee shall maintain a minimum plant residue density of 80% for the project. The cover crop may be cultivated after April 1 for the first three years of development and operation; after three years a permanent, no-till cover shall be established. Should the permanent no-till cover crop need to be replanted/renewed during the life of the vineyard, cover crop renewal efforts shall follow the County “Protocol for Replanting/Renewal of Approved Non-Tilled Vineyard Cover Crops” July 19, 2004, or as amended.

It is not expected that land preparation activities associated with the proposed vineyard, such as removal of rocks from the soil profile, would substantially affect the USLE modeling results. The USLE model evaluates the environmental conditions and physical forces that lead to the detachment and movement of soil particles. The primary goal of cultivating the soils within the development area during implementation is to prepare the site for planting, including fracturing and mixing layers of compressed soil and rock to facilitate root growth and improve permeability, rather than to remove all the rock within the development area soils. Soil cultivation may result in a greater number of smaller rocks at the soil surface. Smaller rocks that emerge through development would be left within the vineyard, and only larger rocks that surface would be removed. Because the larger rocks that may be removed from the site are generally underneath the soil surface, the removal of larger rocks that emerge during development would not significantly alter the composition of soil. Therefore, the soil type classification utilized in the USLE calculations would remain unchanged (Oster, 2008).

For these reasons, the proposed project, with incorporation of specified erosion control measures and conditions of approval, would not increase soil erosion and the loss of topsoil as compared to existing conditions, and maximize the potential for containment of detached soil particles to the project site, resulting in a less-than-significant impact with regard to soil erosion, soil loss, and sedimentation.

Also see **Section IX Hazards and Hazardous Materials** and **Section X Hydrology and Water Quality** for additional disclosures related to water quality. Additionally, as shown in the soil loss modeling following development, overall soil loss is anticipated to be less than pre-development conditions. This is consistent with General Plan Conservation Element Policy CON-48, which requires post-development sediment erosion conditions, or soil loss, be less than or equal to pre-development conditions.

- c. As discussed above, the project site is not located in an area susceptible to ground failure, liquefaction and there are no landslides or landslide deposits mapped on the project site, and the proposed project would address any potential soil instability. The proposed vineyard development is not expected to cause any significant decrease in slope stability nor any increase in erosion associated with landslide processes. Therefore, the proposed project would not result in any significant impacts of on- or off-site landslides, lateral spreading, subsidence, liquefaction or collapse.
- d. Soils in the proposed development area exhibit a moderate shrink-swell potential: USDA, 1978. Furthermore, no structures are proposed as part of the project and expansive soils pose little risk to vineyards and related agricultural improvements. Therefore, there would be no impacts associated with expansive soils.
- e. The proposed project involves the development of a vineyard. No septic tanks or alternative wastewater disposal systems are needed or proposed for the proposed project. Therefore, no impact would occur regarding soils supporting septic tanks or alternative wastewater disposal systems.
- f. The proposed project would not destroy any unique geologic features on the project site. Due to the nature of the soils in the project site and the nature of the proposed project (which would involve a relatively shallow vineyard), the probability of encountering paleontological resources within the project site is minimal. Furthermore, project approval, if granted, would be subject to the standard conditions, described below, that would avoid and reduce potential paleontological resource impacts. Therefore, impacts to geologic features and paleontological resources are anticipated to be less than significant.

Paleontological Resources – Conditions of Approval:

Discovery of paleontological resources during construction, grading, or other earth moving activities:

- a. If a discovery of a breas, true, and/or trace fossils are discovered during ground disturbing activities, all work within 100 feet of the find shall be temporarily halted or diverted until the discovery is examined by a qualified paleontologist. The paleontologist shall notify the appropriate agencies to determine procedures that should be followed before ground disturbing activities are allowed to resume at the location of the find.
- b. All persons working onsite shall be bound by contract and instructed in the field to adhere to these provisions and restrictions.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. GREENHOUSE GAS EMISSIONS. Would the project:				
a) Generate a net increase in greenhouse gas, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

See **Section III (Air Quality)** for other air quality emissions disclosures and impact assessments.

GHGs are atmospheric gases whose absorption of solar radiation is responsible for the greenhouse effect, which contributes to climate change. GHGs include carbon dioxide (CO₂), methane, nitrous oxide, and fluorocarbons. CO₂ is the principal GHG emitted by human activities, and its concentration in the atmosphere is most affected by human activity. It also serves as the reference gas to which to compare other GHGs. Agricultural sources of carbon emissions include forest clearing, land-use changes, biomass burning, and farm equipment and management activity emissions. CO₂ is used as the reference gas to calculate atmospheric carbon effects of GHGs. GHG emissions are reported as carbon dioxide equivalent (CO_{2e}) which is a metric used to compare the emissions from various GHGs because of their global warming potential (GWP), by converting amounts of other gases with different GWPs to an equivalent amount of carbon dioxide with a GWP of one. Carbon

stocks and sequestration are converted to CO_{2e} by multiplying the carbon total by 44/12 (or 3.67), which is the ratio of the atomic mass of a carbon dioxide molecule to the atomic mass of a carbon atom (<http://ncasi2.org/COLE/faq.html>).²⁰

On April 20, 2022, the BAAQMD adopted updated thresholds of significance for climate impacts (CEQA Thresholds for Evaluating the Significance of Climate Impacts, BAAQMD April 2022)²¹ and included them in its updated CEQA guidance published in April 2023 (referred to as the 2022 CEQA Guidelines). The updated thresholds to evaluate GHG and climate impacts are qualitative in nature and geared toward reducing building energy and transportation emissions from land use development projects. Per the BAAQMD, all other projects should be analyzed against either an adopted local Greenhouse Gas Reduction Strategy (i.e., a qualified Climate Action Plan [CAP]) or other threshold determined on a case-by-case basis by the Lead Agency. If a project is consistent with the State's long-term climate goals of being carbon neutral by 2045, then the project would have a less-than-significant impact as endorsed by the California Supreme Court in *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) *62 Cal. 4th 204).

Napa County has been working to develop a CAP for several years. In 2012, a Draft CAP (March 2012) was recommended using the emissions checklist in the Draft CAP, on a trial basis, to determine potential GHG emissions associated with project development and operation. At the December 11, 2012, Napa County Board of Supervisors (BOS) hearing, the BOS considered adoption of the proposed CAP. In addition to reducing Napa County's GHG emissions, the proposed plan was intended to address compliance with CEQA for projects reviewed by the County and to lay the foundation for development of a local offset program. While the BOS acknowledged the plan's objectives, the BOS requested that the CAP be revised to better address transportation-related GHG emissions to acknowledge and credit past accomplishments and voluntary efforts, and to allow more time for establishment of a cost-effective local offset program. The BOS also requested that best management practices be applied and considered when reviewing projects until a revised CAP is adopted to ensure that projects address the County's policy goal related to reducing GHG emissions. In addition, the BOS recommended utilizing the emissions checklist and associated carbon stock and sequestration factors in the Draft CAP to assess and disclose potential GHG emissions associated with project development and operation pursuant to CEQA.

In July 2015, the County re-commenced preparation of the CAP to: i) account for present day conditions and modeling assumptions (such as but not limited to methods, emission factors, and data sources), ii) address the concerns with the previous CAP effort as outlined above, iii) meet applicable State requirements, and iv) result in a functional and legally defensible CAP. On April 13, 2016, the County, as part of the first phase of development and preparation of the CAP, released Final Technical Memorandum #1: 2014 Greenhouse Gas Emissions Inventory and Forecast, April 13, 2016. This initial phase included: i) updating the unincorporated County's community-wide GHG emissions inventory to 2014, and ii) preparing new GHG emissions forecasts for the 2020, 2030, and 2050 horizons. On July 24, 2018, the County prepared a Notice of Preparation of a Draft Focused EIR for the Climate Action Plan. The review period was from July 24, 2018, through August 22, 2018. The Draft Focused EIR for the CAP was published May 9, 2019. Additional information on the County CAP can be obtained at the Napa County Department of Planning, Building and Environmental Services or online at <https://www.countyofnapa.org/589/Planning-Building-Environmental-Services>. However, the County's draft CAP was placed on hold when the Climate Action Committee (CAC) began meeting on regional GHG reduction strategies in 2019. Napa County currently does not have an adopted qualified CAP with which to evaluate consistency of the project. The County is currently preparing the Regional Climate Action and Adaptation Plan (RCAAP) in collaboration with the cities of American Canyon, Calistoga, Napa, and St. Helena, and the Town of Yountville that aims to reduce GHG emissions and increase resilience to climate change impacts throughout the Napa region. The RCAAP will serve as the qualified CAP to provide a clear framework to determine what land use actions will be necessary to meet the State's adopted GHG reduction goals, including a quantitative and measurable strategy for achieving net zero emissions by 2045.

In the absence of quantitative GHG thresholds from BAAQMD or a qualified CAP for the County, construction and operational GHG emissions from the project are evaluated against the 1,100 metric tons (MT) per year GHG threshold from the neighboring Sacramento Metropolitan Air Quality Management District (SMAQMD). While air quality emission thresholds are difficult to apply across air districts due to the regional nature of air quality impacts, GHG emission impacts are global in nature. Therefore, the use of neighboring air district thresholds is an adequate evaluation given the absence of GHG thresholds from BAAQMD or a qualified CAP for the County.

Carbon stock refers to the total amount of carbon stored in the existing plant material including trunks, stems, branches, leaves, fruits, roots, dead plant material, downed trees, understory, and soil organic material. Carbon stock is expressed in units of metric tons of carbon per acre. When land is cleared, some percentage of the carbon stored is released back to the atmosphere as CO₂.

Carbon storage refers to the carbon stocks held in the soil and vegetation. When land is altered or vegetation is removed, the carbon stored in plants and soil can be released back into the atmosphere as a one-time event. Similarly, adding vegetation to a site would increase carbon stock. Unlike sequestration, which is an active, recurring process, changes to carbon stock typically result in a one-time change of CO₂, and not an ongoing loss or gain over time.

²⁰ "Carbon stock" refers to the total amount of carbon stored in the existing plant material including trunks, stems, branches, leaves, fruits, roots, dead plant material, downed trees, understory, and soil organic material. Carbon stock is expressed in units of metric tons of carbon per acre. When land is cleared, some percentage of the carbon stored is released back to the atmosphere as CO₂. Land clearing or the loss of carbon stock is thus a type of GHG emission (County of Napa, March 2012, Napa County Draft Climate Action Plan).

²¹ <https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines>.

Carbon sequestration refers to the ongoing process by which plants, such as vines, trees, and grasses absorb CO₂ from the atmosphere through photosynthesis, converting it into carbon that is stored in their biomass (roots, stems, leaves) and soil. This process helps remove CO₂ from the atmosphere over time. Any changes in land use or vegetation that reduce carbon sequestration—such as removing natural vegetation or converting land for other uses—lead to ongoing reductions in this CO₂-capturing benefit, potentially increasing the amount of CO₂ that remains in the atmosphere annually. A decrease in carbon sequestration is considered an increase in CO₂ emissions.

a-b. Overall increases in GHG emissions in Napa County were assessed in the EIR prepared for the Napa County General Plan Update certified in June 2008. GHG emissions were found to be significant and unavoidable in that document, despite the adoption of mitigation measures incorporating specific policies and action items into the General Plan.

The County requires project applicants to consider methods to reduce GHG emissions consistent with Napa County General Conservation Element Plan Policy CON-65e. Pursuant to State CEQA Guidelines Section 15183, this assessment focuses on impacts that are “peculiar to the project,” rather than the cumulative impacts previously assessed, because this Initial Study assesses a project that is consistent with an adopted General Plan for which an EIR was prepared.

Because BAAQMD does not provide significance thresholds for operational emissions that could be applied to the proposed project, the operational emissions are compared to the SMAQMD annual GHG threshold to provide context for the magnitude, or lack thereof, of operational emissions global impacts.

Emission from the change in vegetation associated with the project are quantified and include: i) the carbon stocks that are lost or released when site vegetation is removed or burned, including any woody debris and downed wood; ii) underground carbon stocks, or soil carbon, released when soil is ripped in preparation for vineyard development and planting (referred to as Carbon Stock Emissions below); iii) continuous carbon sequestration that is gained or lost by altering vegetation or conserving specific land types (referred to as Carbon Sequestration Emissions below).

The estimates presented below are products of the County's Vineyard Carbon Emissions Stock and Sequestration (V-CESS) Calculator (March 2026). The V-CESS Calculator is based on scientific studies prepared for vineyard development Environmental Impact Reports in the County as noted in **Section III (Air Quality)** and the *Regional Carbon Stock Inventory Report for Napa County (August 2023)*, and is supported by Napa County Interim GHG Calculation Assumptions and Potential Mitigation Measures (ESA July 2025), to disclose and assess potential carbon stock and sequestration impacts associated with the proposed project.

Construction Emissions:

Construction emissions associated with vineyard development projects include emissions from fuel used in construction equipment and vehicle trips used to develop and prepare the development area and plant vineyard. As discussed in **Section III (Air Quality)**, three County Certified CEQA documents assessed and analyzed potential air quality and GHG emissions associated with vineyard development. Within those EIRs potential GHG emissions associated with construction equipment were calculated and disclosed. An estimation of potential construction equipment emissions per acre of vineyard development was derived using the highest emissions results of the three projects; the KJS EIR anticipated approximately 1,880 metric tons (MT) CO_{2e} of construction emissions for a 142-acre vineyard development, resulting in approximately 19.2 MT CO_{2e} of construction equipment emissions per acre of vineyard development.²² Using this emission factor it is anticipated that Construction Equipment Emissions associated with the proposed project's 10.7 gross acres of vineyard development would be approximately 205.9 MT CO_{2e}, which is derived by multiplying 10.7-acres by 19.24 MT CO_{2e}. Construction emissions are seasonal in nature and would only occur during the dry season (typically April through October) of any given year. While BAAQMD has no quantitative GHG threshold for comparison, the project's construction equipment emissions are well below the SMAQMD GHG emission threshold of 1,100 MT CO_{2e} and therefore are less than significant.

Operational Emissions:

Emissions associated with the operation of the vineyard include the use of equipment and vehicles to maintain and farm the vineyard, including vehicles (such as haul trucks, pick-up trucks), and worker vehicle trips. The three vineyard development project analyses referenced in the construction emissions analysis above also assessed ongoing vineyard operation emissions associated with vehicles and equipment. The estimated potential operational emissions per acre of vineyard development were derived using the highest emissions results of the three projects; the Stagecoach North Vineyard EIR estimated approximately 322 MT CO_{2e} operational emissions per year for a 116-acre vineyard, resulting in approximately 2.77 MT CO_{2e} of operational emissions per acre of vineyard per year. Using this emission rate, it is anticipated that operational equipment emissions associated with the proposed the proposed 16.7-acre agricultural development would be approximately 29.7 MT CO_{2e} per year, which is derived by multiplying 10.7 by 2.77 MT CO_{2e}. Operational emissions are also seasonal in nature, mostly occurring during the harvest season. While the BAAQMD's qualitative operational thresholds do not apply to

²² As discussed in Section III (Air Quality) variations or similarities in emissions modeling results between the three projects can be attributed to modeling platform and version utilized, variations in modeling assumptions and inputs (such as project acreage and vegetation types removed), and anticipated construction and equipment and duration of use.

projects such as the proposed project which do not generate emissions from building energy and transportation, the project's operational emissions can be considered less than significant when compared to SMAQMD's operational threshold of 1,100 MT CO_{2e} per year.

Emissions from Change in Vegetation including Construction and Operation²³:

Converting existing land/vegetation types into vineyard can impact both carbon stock and sequestration from vegetation and soil. Carbon stock emissions resulting from vegetation removal and soil preparation associated with the conversion of approximately 10.7-acres of existing vegetation to vineyard are disclosed below, which includes carbon stored in aboveground vegetation and belowground in soil.

For emissions impact assessment associated with carbon stock emissions and sequestration associated with the projects' vegetation removal, the County compares the loss/removal of oak woodland and coniferous forest against the project's proposed avoidance and preservation of these two vegetation types to determine impact significance. Projects that avoid and preserve at a minimum an equal amount of developable²⁴ oak woodland and/or coniferous forest as the total amount of woodland and/or coniferous forest being removed, regardless of slopes they occur on, result in no net loss in sequestration or increases in emissions. This results in a less than significant impact. The oak woodland and coniferous forest vegetation types are utilized for this determination because they have the highest carbon stock and sequestration values. As noted above, the following emissions are based on all vegetation types affected by the project, not just oak woodland and/or coniferous forest.

Based on V-CESS Calculator inputs that include the removal of 3.8-acres of oak woodland, 5.4-acres of non-native grassland, 1.1 acres of mixed shrubland, 0.1-acres of mixed conifer, 0.3-acres of ruderal or otherwise developed land, a preservation area that includes 4.6-acres of developable oak woodland, in addition to vehicular emissions and loss of sequestration due to vegetation removal, the project is anticipated to result in a less than significant GHG impact. The V-CESS outputs of project show that there could be a one-time project emissions reduction of 551.9 MT CO_{2e} which is below the SMAQMD's construction threshold of 1,100 MT CO_{2e}. These project output values or emissions consist of the following in MT CO_{2e}: equipment emissions 205.9, carbon stock emission due to removal of existing vegetation 524.4, carbon sequestration annually due to vegetation removal -22.1, carbon stock sequestration due to preservation -646.6, and annual carbon sequestration due to preservation -8.8.

Specific to carbon sequestration under existing conditions, the project area currently emits up to -13.3 MT CO_{2e} annually. This is due to the large amount of non-native grassland in the project area. As proposed it is anticipated that annual sequestration would increase to 22.1 MT CO_{2e} a year. Therefore, the project as proposed would result in a less than significant GHG impact and no net loss in sequestration and would not have a significant impact on the environment or conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.

It should be noted that **Mitigation Measure BIO-3** includes the mechanism to permanently preserve at least 5.1-acres of developable oak cover canopy and associated woodland, which is necessary to realize this emission totals.

Considering the project's one-time carbon stock emissions of 551.9 MT CO_{2e}, and that the overall the proposed project would reduce emissions from changes in carbon stock and sequestration by 22.1 MT CO_{2e} annually, the carbon stock and sequestration gained from the proposed project results in an increase in net carbon sequestration associated with the project. Therefore, the proposed project would not have a significant impact on the environment or conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs. This impact would be less than significant.

Additionally, While the BAAQMD's qualitative operational thresholds do not apply to projects such as the proposed project which do not generate emissions from building energy and transportation, the project's operational emissions can be considered less than significant when compared to SMAQMD's operational threshold of 1,100 MTCO_{2e}/year.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

²³ The V-CESS Calculator is supported by Napa County Interim GHG Calculation Assumptions and Potential Mitigation Measures (ESA July 2025), to disclose and assess potential carbon stock and sequestration impacts associated with the proposed project. The V-CESS Calculator's methodology to estimate GHG emissions applies the corresponding carbon stock, sequestration, and equipment emissions from published scientific studies to project-specific data for existing vegetation, vegetation that would remain with proposed development, and the size of development. Additional reductions in carbon stock and sequestration from mitigation measures are derived from the CDFA COMET-Planner tool.

²⁴ Developable woodland/forest is defined as those woodlands and forests located on slopes less than 30% and outside of aquatic resource setbacks.

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| b) Create a significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Discussion

a-b. Installation of the proposed project and subsequent vineyard operation and maintenance would require a variety of equipment and vehicles that use fuel and other petroleum-based products such as oil and transmission fluids, which are considered hazardous materials. Ongoing vineyard operations would also involve the transport and use of chemicals such as mildewcides and fertilizers to the site that are considered hazardous materials. The Napa County Agricultural Commissioner enforces application of pesticides and regulates applicators.

A detailed listing of fertilizers and other chemicals, application methods, application amounts, number of annual applications, and annual amounts of chemicals that are anticipated to be used for ongoing vineyard maintenance and operation of the proposed vineyard is provided within Supplemental Project Information forms on file at the Planning Department. As indicated in the Project Description Section on page 2 of this Initial Study under Other Activities and Features, the proposed project does not include the use of herbicides for ongoing vineyard operations.

Onsite storage of hazardous materials would occur in an existing on-site storage facility located approximately 50 feet northeast of the existing residence: see **Figure 4 of Exhibit A**. Chemical mixing or cleaning and washing of chemical application equipment would occur at this location or within the vineyard development areas.

Fertilizers would be distributed through the drip system typically one time per year. Other fertilizers, or soil amendments, such as compost and Gypsum are anticipated to be applied once a year. Mildewcides, such as sulfur and biofungicides, would be applied through spray application between 4 to 6 times per year. As indicated the owner/permittee is not intending on using herbicides on the vineyard for weed management.

Hopper Creek, a U.S. Geological Survey (USGS) blue-line stream is located approximately 0.25 miles, or approximately 1,350 feet, north of the project site. Two unnamed blue-line tributaries to Dry Creek are located approximately 0.15 miles, or approximately 800 feet, to the west of the site, the other is within the project site located 65 feet from the project area: **Figure 1 and Exhibit A**. There are three other minor ephemeral drainages located adjacent to the project area that are associated with this unnamed blue-line stream.

Generally, the project has been designed to provide setbacks from streams and seasonal wetlands more than 50 feet. The National Resource Conservation Service recommends a minimum 50-foot-wide vegetated buffer from aquatic resources (such as streams, ephemeral drainages, and wetlands) because under most conditions it is generally an adequate buffer width to provide enough vegetation to effectively entrap and filter chemicals, nutrients, and sediment thereby, facilitating degradation within buffer soils and vegetation (USDA, 2000). Between proposed Vineyard Blocks 3 and 5 and south of proposed Vineyard Block 2, 35-foot setbacks are provided from the ephemeral drainages, however the topography of this area is characterized by sheet flow parallel to these ephemeral drainages; therefore, they do not receive runoff directly from these vineyard blocks.

The risk of potentially hazardous materials reaching or affecting adjacent water courses or other aquatic resources is significantly reduced because: 1, herbicides are not intended to be utilized in the proposed vineyard, 2, streams or wetlands have generally been provided with a minimum 50 foot buffer from the proposed development areas; and 3, only federal and/or California approved chemicals would be applied to the vineyard in strict compliance with applicable state and federal law. Project approval, if granted, would also be subject to the

following standard conditions of approval that would further avoid and/or reduce potential impacts associated with routine transport and use of hazardous materials during project implementation and ongoing vineyard operations and maintenance.

Hazardous Materials – Conditions of Approval:

The owner/operator shall implement the following BMPs during construction activities and vineyard maintenance and operations:

- a. Workers shall follow manufacturer’s recommendations on use, storage and disposal of chemical products.
- b. Workers shall avoid overtopping fuel gas tanks and use automatic shutoff nozzles where available.
- c. During routine maintenance of equipment, properly contain and remove grease and oils.
- d. Discarded containers of fuel and other chemicals shall be properly disposed of.
- e. Spill containment features shall be installed at the project site wherever chemicals are stored overnight.
- f. All refueling, maintenance of vehicles and other equipment, handling of hazardous materials, and staging areas shall occur at least 100 feet from watercourses, existing groundwater well(s), and any other water resource to avoid the potential for risk of surface and groundwater contamination.
- g. To prevent the accidental discharge of fuel or other fluids associated with vehicles and other equipment, all workers shall be informed of the importance of preventing spills and of the appropriate measures to take should a spill occur.

For these reasons, and with incorporation of the conditions of approval described above, impacts associated with the use, storage, and transport of hazardous materials and accidental release of hazardous materials would be less than significant.

- c. The closest schools, Sunrise Montessori of Napa Valley, La Sagrada Familia Catholic International Home School Academy, and Unidos Middle School are all located approximately 3.5 miles to the south of the project site within the City of Napa: Napa County GIS, Schools Layer. There are no schools within 0.25 miles of the project site. Therefore, no impact would occur.
- d. The project site is not on any of the lists of hazardous waste sites enumerated under Government Code Section 65962.5: Napa County GIS hazardous facility layer and GeoTracker 2024. Therefore, no impact would occur.
- e. The project site is neither located within an area covered by an airport land use plan, nor is it within 2 miles of a public, public-use, or private airport: Napa County Airport Land-use Compatibility Plan 1991, and Napa County GIS Airport Layer. The closest airports are the Napa Airport and Parrett field in Angwin, which are both over 13 miles from the project site. Therefore, no impact would occur.
- f. During construction and operation of the project there would be negligible numbers of workers, approximately 20 employees, visiting the project site on a temporary basis to implement the project and install vineyards resulting in up to 20 round trips during peak operational activity. No road closures would be required to implement the project, and there would not be a permanent substantial increase in the number of people working or residing at or near the project site. Therefore, the proposed project would not impair implementation of or physically interfere with any adopted emergency response plan or emergency evacuation plan, and the impact would be less than significant.
- g. No structures are proposed as part of the project. The project area is in a State Responsibility Area, or SRA, that is designated as a High Fire Hazard Severity Zone: CalFire, Fire Hazard Severity Zone 2022, and Napa County GIS Fire Protection Responsibility Areas and Fire Hazard Severity Zones-WUI layers. The risk of fire in vineyards due to the proposed project is low due to the limited amount of fuel, combustibles, and ignition sources that would be present. Vineyards are irrigated and cover crops are typically mowed or grazed April through October, thereby reducing the fuel loads within the vineyard. The removal of vegetation and the management of the vineyard may result in an overall reduction of fuel loads within the project site as compared to existing conditions. Therefore, the proposed project would not increase the exposure of people or structures to wildland fires, and the impact would be less than significant.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				

- | | | | | | |
|------|---|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| i. | Result in substantial erosion or siltation on- or off-site; | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| ii. | Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| iii. | Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| iv. | Impede or redirect flood flows? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) | In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) | Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Discussion

The County requires all discretionary permit applications, such as use permits and ECPAs, to complete necessary water analyses to document that sufficient water supplies are available for the proposed project.

On June 7, 2022, the Napa County Board of Supervisors provided interim procedures to implement provisions of the Napa County Groundwater Sustainability Plan (GSP) for issuance of new, altered or replacement well permits and discretionary projects that would increase groundwater use. The direction limits a parcel's groundwater allocation to 0.3- acre feet per acre per year, or no net increase in groundwater use if that threshold is exceeded already for parcels located in the GSA Subbasin. For parcels not located in the GSA Subbasin (i.e., generally located in the hillsides), a parcel-specific Water Availability Analysis would suffice to assess potential impacts on groundwater supplies.

The project well is located outside the GSA Subbasin and the Milliken Sarco Tulocay Groundwater Deficient Area: the GSA Subbasin is located over 1 mile to the east of the project site and Milliken Sarco Tulocay Groundwater Deficient Area is located over 5 miles to the east.

To assess potential impacts resulting from project wells interference with neighboring wells within 500 feet and/or springs within 1,500 feet, the County's WAA guidance requires applicants to perform a Tier 2 analysis where the proposed project would result in an increase in groundwater extraction from project wells and springs compared to existing levels.

To assess the potential impacts of groundwater pumping on hydrologically connected navigable waterways, the County's WAA guidance requires applicants to perform a Tier 3 analysis for new or replacement wells, or discretionary projects that would result in an increase in groundwater demand on existing wells that are located within 1,500 feet of designated "Significant Streams."²⁵

Public Trust: The public trust doctrine requires the state and its legal subdivisions to consider, give due regard, and take the public trust into account when considering actions that may adversely affect a navigable waterway: *Environmental Law Foundation v. State Water Resources Control Bd.*; *San Francisco Baykeeper, Inc. v. State Lands Com.* There is no procedural matrix governing how an agency should consider public trust uses: *Citizens for East Shore Parks v. State Lands Com.* Rather, the level of analysis begins and ends with whether the challenged activity harms a navigable waterway and thereby violates the public trust: *Environmental Law Foundation*, 26 Cal.App.5th at p. 403. As demonstrated in the *Environmental Law Foundation vs State Water Resources Control Board Third District Appellate Court Case*, that arose in the context of a lawsuit over Siskiyou County's obligation in administering groundwater well permits and management program with respect to Scott River, a navigable waterway, considered a public trust resource, the court affirmed that the public trust doctrine is relevant to extractions of groundwater that adversely impact a navigable waterway and that Counties are obligated to consider the doctrine, irrespective of the enactment of the Sustainable Groundwater Management Act, or SGMA.

On January 10, 2024, Napa County released the Interim Napa County Well Permit Standards and WAA Requirements - January 2024, providing guidance to comply with the Public Trust.

The Napa River is currently listed as an impaired waterbody for nutrients, pathogens, and sediment under Section 303(d) of the CWA. Historically, the construction of large dams and other impoundment structures between 1924 and 1959 on major tributaries in the eastern Napa River watershed and northern headwater areas of the Napa River has affected sediment transport processes into the mainstem of the Napa River by reducing the delivery of coarse load sediments to the river: Stillwater Science and W. Dietrich, 2002. However, the finer sediments that are not trapped by dams negatively affect salmonid habitat by reducing gravel permeability, potentially affecting special-status fish species: Stillwater Science and W. Dietrich, 2002.

²⁵ Refer to Figure 1: Significant Streams for Tier 3, located at www.countyofnapa.org/3074/Groundwater-Sustainability. The "Significant Streams" and "Significant Streams_1500ft_buffer" GIS layers are published as publicly available open data through the County's ArcGIS Online Account.

In response, the San Francisco Bay Regional Water Board has implemented the following programs. In 2009 the San Francisco Bay Regional Water Board adopted total maximum daily load, or TMDL, for the Napa River: Order #R2-2009-0064. This order calls for reductions in the amount of fine sediment deposits into the watershed to improve water quality and maintain beneficial uses of the river, including spawning and rearing habitat for salmonid species. Several watershed stewardship groups have developed management plans and are planning or have implemented large-scale projects to enhance water quality and stream-riparian habitat with the watershed: San Francisco Bay Regional Water Board, 2009.

Further, because vineyard properties may pose threats to water quality by discharging sediment, nutrients, and pesticides and/or by increasing storm runoff, which consequently can cause erosion and sedimentation and otherwise impact aquatic life, in July 2018 the San Francisco Bay Regional Water board adopted a water quality control permit (or General Permit) for vineyard properties in the Napa River and Sonoma Creek watersheds (Order #R2-2017-0033). The General Permit regulates parcels (including contiguous parcels under common ownership) developed with five or more acres of vineyard located in either of these watersheds. The Napa River and Sonoma Creek TMDLs adopted by the San Francisco Bay Regional Water Board have established performance standards for sediment discharge and storm runoff to protect and restore water quality. The General Permit would require actions to control pollutant discharges including sediment and storm runoff from vineyards and unpaved roads, which are located throughout vineyard properties, and pesticides and nutrients from vineyards. The General Permit would require vineyard owners or operators of parcels that meet the enrollment criteria to do the following: develop and certify a "farm plan"²⁶; implement the farm plan to achieve discharge performance standards; submit an annual report regarding plan implementation and attainment of performance standards; and participate in group or individual water quality monitoring programs.

In the General Permit the San Francisco Bay Regional Water Board identified four significant sediment sources that are associated with vineyard properties: 1, vineyard soil erosion, 2, offsite erosion caused by vineyard storm runoff increases; 3, road-related sediment delivery; and 4, channel incision. Napa County ECPA requirements and standards primarily address and control two of these sources, vineyard soil erosion and vineyard storm runoff. The General Permit will fill gaps in local regulation so that all four sediment sources are effectively controlled to reduce fine sediment deposition in stream channels that provide habitat for endangered steelhead populations, locally rare Chinook salmon populations, and exceptionally diverse assemblages of native fish species in these watersheds. Additional details on the Vineyard Properties General Permit can be obtained from the Regional Water Board²⁷.

In an August 13, 2025, presentation at the San Francisco Bay Regional Water Quality Control Board on the TMDLs and General Permit it was indicated that approximately 1,100 vineyard properties encompassing approximately 77,000-acres, which includes approximately 37,000 planted acres, are enrolled in the program. Habitat enhancement along a 14-mile stretch of the Napa River in conjunction with the plans/permits to control sediment discharge have resulted in significant improvement to water quality due to a positive impact on sediment discharges from land use activities: due to these activities and permits monitoring reports have shown water quality has been improving in particular fine sediments: Napa River and Sonoma Creek Vineyard Waste Discharge Requirements, Streambed Monitoring Final Report, July 2024, Napa County Resource Conservation District.

The project site is in the Hopper Creek and Dry Creek drainages. Hopper Creek, a U.S. Geological Survey (USGS) blue-line stream is located approximately 0.25 miles, or approximately 1,350 feet, north of the project site. Two unnamed blue-line tributaries to Dry Creek are located approximately 0.15 miles, or approximately 800 feet, to the west of the site, the other is within the project site located 65 feet from the project area: **Figure 1** and **Exhibit A**. There are three other minor ephemeral drainages located adjacent to the project area that are associated with this unnamed blue-line stream. Drainage from the project site and area is characterized by surface sheet flow with runoff generally flowing toward the Dry Creek Drainage and to a lesser extent the Hopper Creek Drainage. Dry Creek connects to the Napa River approximately 6.25 miles east/southeast of the site, Hopper Creek connects to the Napa River approximately 6 miles to the east/northeast.

- a. Waste discharge is not anticipated as part of the proposed project or ongoing vineyard operations; therefore, the proposed project would not violate waste discharge requirements.

The proposed project has been designed with site-specific temporary and permanent erosion control measures and features to prevent sediment, runoff, and pollutants from leaving the project site. Agricultural Erosion Control Plan #P25-00029-ECPA includes BMPs that are consistent with NCC Section 18.108.080(c), as well as with Regional Water Board guidance from the Stormwater Best Management Practice Handbooks for Construction and for New Development and Redevelopment, and the Erosion and Sediment Control Field Manual. Therefore, the proposed project is not anticipated to violate any water quality standards or otherwise substantially degrade surface or groundwater quality, and impacts would be less than significant.

- b. The proposed vineyard would be irrigated using groundwater supplied by two existing on-site groundwater wells, identified as the East Well and the West Well.

²⁶ A farm plan documents a vineyard property's natural features, developed areas, and BMPs. Under the General Permit, a "certified" farm plan would mean that upon its full implementation of the plan, that the vineyard property is expected to achieve the performance standards for discharge. The Water Board's Executive Officer would approve third-party programs or certify a farm plan.

²⁷ https://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/agriculture/vineyard/

A Tier 1 and 2 WAA was prepared to determine if the proposed increase in groundwater demand because of the proposed project would result in a significant impact to groundwater supplies: RCS and Associates, January 2025 – **Exhibit D**. The Tier 1 WAA estimates the onsite groundwater recharge and both existing and proposed groundwater use to disclose and assess potential impacts on groundwater in accordance with the WAA Guidance Document adopted by the County on May 12, 2015. The East Well is located within 500 feet of an offsite well; therefore, the Tier 2 Well Interface Analysis was prepared. The project wells are not located within 1,500 feet of a significant stream per Napa County GIS information and RCS and Associates; therefore, no Tier 3 WAA is needed. Also see Figure 2 of **Exhibit D**.

Tier 1 Water Availability Analysis: Existing onsite groundwater demands are approximately 1.1 AF/yr for the single-family residence, second dwelling unit, minor landscape irrigation, and pool. With the proposed development of approximately 8 net acres of new vineyard, water demand would increase by approximately 5.6 AF/yr including water for heat protection, for a total onsite water demand of approximately 6.7 AF/yr.

Long-term average groundwater recharge can be estimated as the percentage of rainfall that falls on the project aquifer recharge area that percolates into the underlying aquifer. The percentage of rain that has the potential to infiltrate varies depending on factors such as rates of evaporation and transpiration, slope, soil type and geology that occur in the site, and average annual rainfall. Based on available climatological data, site-specific information, and other available data and analysis relevant to potential recharge, the project WAA, which uses an average annual rainfall of 30.5 inches per year over an approximately 120-acre aquifer recharge area within the project site and an 6% deep percolate recharge rate, estimates the average annual groundwater recharge to be approximately 15.3 AF/yr, which also takes into account the effect of slope on the anticipated groundwater recharge rate: see **Exhibit D** for details and calculations. The average annual rainfall utilized in the recharge analysis includes times of below-average and above-average rainfall over the past 10 years, and therefore inherently includes drought-year conditions. The estimated annual future groundwater demand of 6.7 AF/yr is below the estimated average annual recharge volume of 15.3 AF/yr identified in the Project WAA.

Tier 2 Water Availability Analysis: According to the County's WAA Guidelines, if a project well is within 500 feet of a non-project well a Tier 2 WAA is required. The Tier 2 WAA also considered springs that originate as groundwater. An offsite well exists within 500 feet of the East Well and there are no know off-site springs within 500 feet or 1,500 feet of the project wells: RCS and Associates, January 2025 – **Exhibit D**. Observations and data discussed in the Project's Tier 2 WAA analysis concluded that the East Well does not have a significant hydraulic connection to off-site wells and that pumping from the East Well would not have a significant hydraulic effect on the offsite wells. Therefore, a Less than significant impact is expected.

Considering the following, that anticipated annual water use of approximately 6.7 AF/yr is below the anticipated annual groundwater recharge rate of approximately 15.3 AF/yr, that the project wells are not anticipated to have a significant hydraulic effect on the offsite wells, that there is no evidence to date indicating that there are groundwater problems or declining well production in the this area of the County, and with incorporation of the standard groundwater management conditions of approval below, if approved, the proposed project would result in less-than-significant impacts to groundwater supplies, groundwater recharge, and local groundwater aquifer levels.

Additionally, as detailed in the Background Section of this Initial Study the proposed project was originally designed to include 11.1 gross acres of vineyard development with approximately 8.0 planted acres, which is what the Project WAA is based on, but was subsequently revised to remove a proposed vineyard block reducing the project to 10.7 gross acres with approximately 7.8 net planted acres. Therefore, anticipated water use may be slightly lower than identified herein, which would further reduce this in less-than-significant impact.

Groundwater Management, Wells – Conditions of Approval:

- a. The Owner/Permittee shall be required, at the permittee's expense, to record well monitoring data, specifically static water level no less than quarterly and the volume of water no less than monthly. Such data shall be provided to the County upon request or if the PBES Director determines that substantial evidence indicates that water usage is affecting, or would potentially affect, groundwater supplies. If data indicates the need for additional monitoring, and if the owner or permittee is unable to secure monitoring access to neighboring wells, onsite monitoring wells may need to be established to gauge potential impacts on the groundwater resource utilized for the project. Water usage shall be minimized by use of best available control technology and best water management conservation practices.
- b. In order to support the County's groundwater monitoring program, well monitoring data as discussed above shall be provided to the County if the PBES Director determines that such data could be useful in supporting the County's groundwater monitoring program. The project well shall be made available for inclusion in the groundwater monitoring network if the PBES Director determines that the well could be useful in supporting the program.
- c. In the event that changed circumstances or significant new information provide substantial evidence that the groundwater system referenced in the Erosion Control Plan #P25-00029-ECPA would significantly affect the groundwater basin, the PBES Director shall be authorized to recommend additional reasonable conditions on the owner/permittee, or revocation of this permit, as necessary to meet the requirements of the Napa County Code and to protect public health, safety, and welfare.
- d. No new on-site or off-site water sources, other than those evaluated as part of this ECPA, proposed to be used for the vineyard, including but not limited to wells, imported water, new or existing ponds or reservoirs or other surface water impoundments to

serve the vineyard, shall be allowed without additional environmental review, if necessary, and may be subject to a modification to this ECPA. A new Water Availability Analysis shall be required prior to approval of any new water sources on the property.

- c. Earthmoving activities have the potential to alter the natural pattern of surface runoff, which could lead to areas of concentrated runoff and/or increased erosion. The conversion of existing vegetation to vineyard would alter the composition of the existing land cover and infiltration rates, which could affect erosion and runoff. The proposed project does not propose any alteration to a stream, river, or drainage course, or include the creation of impervious surfaces that would concentrate runoff. Refer to **Exhibit F** for details related to the following discussion.

Erosion control measures and plan features that are not anticipated to affect drainage patterns but would assist in minimizing the potential for increased erosion and water runoff include the installation of straw wattles, rock level spreader, the establishment of a no-till cover crop with vegetative cover density minimum of 80%, and the application of straw mulch cover on all disturbed areas as needed to achieve the required coverage. These features would slow and filter surface runoff water, thereby minimizing sediment, nutrients, and chemicals from leaving the project site and entering nearby aquatic resources.

Proposed erosion and runoff control features that have the potential to alter natural drainage patterns include diversion ditches, drop inlets and associated subsurface drainage lines, rock aprons and rock protect outfalls. These proposed erosion and runoff control measures are not anticipated to materially alter the existing topography or drainage patterns of the project site or development areas, or direct surface flows into other watersheds. As discussed in **Section VII Geology and Soils**, erosion control features in conjunction with the cover crop are anticipated to reduce soil loss by approximately 22.9% as compared to existing conditions.

A Hydrologic Analysis for the proposed project was prepared by PPI Engineering, dated August 12, 2024 – **Exhibit F**. The Hydrologic Analysis identified two project level watersheds and four subareas for the hydrologic analysis. The two watersheds were analyzed utilizing the Natural Resource Conservation Service TR-20 method to compare the pre- and post-development peak stormwater runoff rates from the proposed development area for the 2-year, 10-year, 50-year, and 100-year, 24-hour design storms. Watershed 1 contains approximately 14.2-acres and drains to Hopper Creek, and Watershed 2 contains approximately 37.5-acres and outlets to an unnamed stream before draining to Dry Creek.

Subareas 1 through 4 are all less than 5-acres in area and are located on a minor ridgeline at or near the watershed break that separate Watershed 2 from the four subareas to the west. Because of this, these areas were analyzed using pre-project and post-project curve number analysis given their small acreages. A Curve Number, or CN, is a dimensionless parameter used in hydrologic analyses that was developed by the USDA Natural Resources Conservation Service to estimate surface runoff volume from rainfall. A higher post-project curve number indicates a higher runoff potential. A change in curve number is directly correlated to a change in runoff at this small scale.

The post-development peak stormwater runoff rates for the proposed project were calculated to be less than the pre-development peak stormwater runoff rates, ranging from a 0.25 to a 0.73 cubic feet per second reduction in runoff rates for Watershed 1, and reductions ranging from 0.28 to 0.66 cubic feet per second in Watershed 2, and that times of concentration would remain the same: see **Exhibit F** for the detailed results.

These calculations indicate that the proposed project would not result in increases in peak flow and runoff consistent with General Plan Conservation Element Policy CON-50c, which states peak runoff following development cannot be greater than predevelopment conditions. Therefore, the proposed project would have a less-than-significant impact with respect to alterations of existing drainage patterns of the site or area that would result in increased runoff, or considerable on or offsite erosion, siltation, or flooding

The project site is not located in an area of a planned stormwater drainage system, nor is it not directly served by a stormwater drainage system. As discussed above, no overall increase in runoff volume or decrease in time of concentration is anticipated under post-project conditions. Furthermore, as discussed in **Section VII (Geology and Soils)**, a reduction in soil loss and sedimentation is anticipated under post-project conditions. Therefore, the proposed project would not contribute a substantial amount of additional runoff to an existing stormwater drainage system or provide substantial additional sources of polluted or sediment laden runoff, resulting in a less-than-significant impact.

In addition, pursuant to NCC Section 18.108.135 - Oversight and Operation, projects requiring an erosion control plan would be inspected by the County after the first major storm event of each winter until the proposed project has been completed and stable for three years to ensure that the implemented erosion control plan is functioning properly.²⁸

²⁸ Compliance with Section 18.108.135 is achieved by including their provisions as conditions of approval for a project, if granted, as indicated in **Section VII (Geology and Soils)**.

- d. The development areas are not located within a Federal Emergency Management Agency 100-year flood zone, in a dam or levee failure inundation area, or in an area subject to seiche or tsunami: Napa County GIS, Tsunami Hazard areas, Flood hazard areas, and Dam levee inundation areas layers, and Napa County General Plan-Safety Element, 2023. Therefore, no impact would occur.
- e. The proposed project would not have an adverse impact on water quality because the ECPA has been designed to keep polluted runoff and sediment from leaving the project site. As discussed in **Section IX Hazards and Hazardous Materials**, the project proposes the use of potentially hazardous materials during implementation activities (i.e., oil, gasoline, and transmission fluids associated with construction equipment) and the application of chemicals (i.e., fertilizers) for ongoing vineyard maintenance. Only federal and/or California approved chemicals would be applied to the vineyard in strict compliance with applicable State and federal law. As discussed in **Section IV Biological Resources** and **Section IX Hazards and Hazardous Materials**, buffers provided in the ECP to area watercourses would facilitate increased water infiltration so that chemicals and potentially hazardous materials associated with project implementation and operation can be trapped and degraded in buffer vegetation and soils to protect water quality. The limited application of agricultural chemicals generally occurring during the non-rainy season would also minimize the amounts of chemicals that could impact on or offsite water resources. Because the proposed project as designed is not expected to increase overall runoff rates or a decrease in time of runoff concentration in relation to existing conditions, as discussed in Question c above, the proposed cover crop and buffers would be able to effectively trap and filter sediments, thereby minimizing their entry into nearby water resources.

As discussed above and in **Section VII Geology and Soils**, the proposed project has been designed with site-specific temporary and permanent erosion and runoff control measures and features to prevent sediment, runoff, and pollutants from leaving the project site. As such, the proposed project is anticipated to reduce soil loss and sedimentation by approximately 6.4 tons per year, have no negative effect on runoff rates, and maintain project site drainage characteristics as compared to existing conditions. The ECPA includes BMPs that are consistent with NCC Section 18.108.080(C), as well as with Regional Water Board guidance from the Storm Water Best Management Practice Handbooks for Construction and for New Development and Redevelopment, and the Erosion and Sediment Control Field Manual.

Furthermore, project approval, if granted, would be subject to the following condition of approval, which would further reduce and avoid potential impacts to water quality because of the proposed project and ongoing operations.

Water Quality – Condition of Approval:

The owner/permittee shall refrain from disposing of debris, storage of materials, or constructing/operating the vineyard, including vineyard avenues, outside the boundaries of the approved plan, or within required setbacks pursuant to Napa County Code Section 18.108.025: General Provisions – Intermittent/perennial streams. Furthermore, consistent with the Hazards and Hazardous Materials conditions of approval, all operational activities that include the use or handling of hazardous materials, such as but not limited to agricultural chemical storage and washing, portable restrooms, vehicular and equipment refueling/maintenance and storage areas, soil amendment storage and the like, shall occur at least 100 feet from groundwater wells, watercourses, streams and any other water resource to avoid the potential risk of surface and groundwater contamination, whether or not such activities have occurred within these areas prior to this ECPA approval.

Therefore, the proposed project as designed, in conjunction with identified conditions of approval, would not adversely conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. No impact would occur.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. LAND USE AND PLANNING. Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

- a. The approximate 120-acre project site is located approximately 1.25 and 1.75 miles west/northwest of the Veterans Homes of California (Yountville) and downtown Yountville, respectively. The project site is in a rural setting where surrounding parcels are generally undeveloped grasslands and woodlands interspersed with vineyards and rural residences. Therefore, the proposed vineyard and subsequent vineyard operations are consistent with surrounding land uses and would not physically divide an established community. No impact would occur.

- b. The project site is zoned as Agricultural Watershed and is designed under the Napa County General Plan Land Use Element as Agricultural, Watershed and Open Space. Surrounding parcels are also zoned and designated as Agricultural Watershed and Agricultural, Watershed and Open Space. Vineyards and associated improvements are permitted uses under these designations.

The proposed project has been analyzed for consistency with applicable sections of the NCC and with the Napa County General Plan. With inclusion of the mitigation measure and conditions of approval, the proposed project has been found consistent with applicable code requirements and General Plan Goals and Policies, including but not limited to the following:

- The proposed project is consistent with NCC Section 18.108.010, which requires that soil loss and runoff because of a project be minimized to protect water quality. As discussed in **Sections VII Geology and Soils** and **X Hydrology and Water Quality**, the proposed project is anticipated to decrease soil loss and potential sedimentation and maintain runoff conditions as compared to existing conditions resulting in no overall increase soil loss, in runoff volume or decreases in times of concentration.
- The proposed project is consistent with Policies CON-48 and CON-50c, which require pre-development sediment erosion conditions and runoff characteristics following development not be greater than predevelopment conditions. As discussed in **Section VII Geology and Soils** and **Section X Hydrology and Water Quality** the project as proposed would reduce soil loss, sedimentation, and reduce runoff characteristics as compared to existing conditions.
- The proposed project with implementation of **Mitigation Measures BIO-1** through **BIO-3** is consistent with Policies CON-13, CON-16 and CON-17 which require discretionary projects consider and avoid impacts to fisheries, wildlife habitat, and special-status species through evaluation of biological resources, as well as the preservation and protection of sensitive biotic communities, and habitats of limited distribution and no net loss of sensitive biotic communities. A Biological Resources Survey Report was prepared for the proposed project (**Exhibit B-1**). The project as proposed with implementation of **Mitigation Measures BIO-1** through **BIO-3** would minimize potential direct, indirect, and cumulative impacts to special-status species and associated habitat occurring in the project site and immediate area. Furthermore, implementation of these measures would not affect the feasibility of the proposed project in that impacts to special-status species and their habitat can be minimized.
- With implementation of **Mitigation Measures BIO-1** through **BIO-3**, the proposed project is consistent with Goals CON-2 and CON-3, which require the continued enhancement of existing levels of biodiversity and protection of special-status species and habitat, and the County Conservation Regulations through preservation of natural habitats and existing vegetation. With these measures and conditions, the proposed project would maintain levels of biodiversity and would avoid impacts to special-status plant and animal species.
- The proposed project is consistent with Policy CON-18, which encourages the reduction of impacts to habitat conservation and connectivity. Wildlife movement would not be impaired.
- With the implementation of **Mitigation Measure BIO-3**, the proposed project is consistent with Policy CON-24, which requires preservation of 2-acres of oak woodland for every 1-acre impacted and with NCC Section 18.108.020.D which requires a 3 to 1 preservation ratio of canopy cover.
- The project site does not contain wetlands within its boundaries and the proposed project is consistent with Policy CON-30, which encourages the avoidance of wetlands.
- The proposed project is consistent with Policies CON-48 and CON-50c, which require pre-development sediment erosion conditions and runoff characteristics following development to be no greater than pre-project conditions. As discussed in **Section VII Geology and Soils** and **Section X Hydrology and Water Quality**, with incorporation of the Permanent Erosion and Runoff Control Measures condition of approval, the proposed project would reduce soil loss and sedimentation and would not increase runoff.
- The proposed project with mitigation incorporated is consistent with Policy CON-65b. Due to the proposed project's scope and scale, its construction and operational GHG emissions, as disclosed in **Section VIII Greenhouse Gas Emissions**, are anticipated to be less than significant.
- The proposed project is consistent with Policy AG/LU-1, which states that agricultural and related activities are the primary land uses in Napa County, as the proposed project is vineyard development and would increase agriculture uses in the County.
- The proposed project is consistent with the General Plan land use designation of Agricultural Resource and is therefore consistent with Policy AG/LU-21.

For these reasons, the proposed project, with the mitigation measure and conditions of approval incorporated, would not conflict with applicable County regulations, policies, or goals, and is anticipated to result in a less-than-significant impact with respect to applicable County regulations, policies, or goals.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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XII. MINERAL RESOURCES. Would the project:

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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- b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

Discussion

a-b. The project site is not in an area with a known mineral resources of value to the region or state or within a known mineral resource recovery area: Napa County Baseline Date Report, Figure 2-2, 2-3 and Map 2-1, 2005; Napa County General Plan Map, December 2008; Special Report 205, Update of Mineral Land Classification, Aggregate Materials in the North San Francisco Bay Production-Consumption Region, Sonoma, Napa, Marin and Southwestern Solano Counties, California Geological Survey, 2013, California Department of Conservation, 2016. The nearest known mineral resource area in Napa County is associated with the Napa Quarry, located approximately 10 miles southeast of the project site. The proposed development of vineyard on the project site would not physically preclude future mining activities from occurring. Therefore, no impact would occur.

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

Discussion

a-b. The project site is located in a rural setting where surrounding parcels are generally undeveloped grasslands and woodlands interspersed with vineyards, wineries, and rural residences. The nearest established community is the Town of Yountville, located approximately 1.75 miles east of the project site. The closest residences to the project site are located between 0.25 miles (±1,350 feet) to the south and 0.35 miles (±1,800 feet) to the west in the Dry Creek Valley.

Activities associated with installation of the proposed project and subsequent agricultural operations are already occurring within the project site and immediate vicinity. Several types of equipment would be necessary for implementation and operation of the proposed project, including bulldozers, tractors, excavators, backhoes, dump trucks, water trucks, passenger vehicles and/or light trucks.

Table 8 characterizes typical equipment noise levels at a reference distance of 50 feet. As identified in **Table 8**, equipment used for vineyard development could produce a maximum of 89 (A-weighted decibels) dBA at a distance of 50 feet.

Table 8 – Construction Equipment Noise Emission Levels

Equipment	Typical Noise Level (dBA) 50 feet from Source	Equipment	Typical Noise Level (dBA) 50 feet from Source
Backhoe	80	Roller/Sheep's foot	74
Bulldozer	85	Scarifier	83
Chainsaw	86	Scraper	89
Compactor	82	Shovel	82
Excavator/Shovel	82	Spike driver	77
Grader	85	Truck	88
Loader	85	Wood chipper	89

Sources: Cowan 1994, Federal Transit Administration 1995, Nelson 1987, United States Department of Agriculture Forest Service 1980, and Napa County Baseline Date Report Chapter 6 (Noise Resources), November 2005 (Version 1)

Table 9 characterizes the typical reduction in construction equipment noise levels as the distance increases from the source, based on a source noise level of 90 dBA.

Table 9 – Estimated Distance to dBA Contours from Construction Activities¹

Distance from Construction Source	Calculated Noise Level
50 feet	90 dBA
180 feet	75 dBA
300 feet	70 dBA
450 feet	65 dBA
700 feet	60 dBA
1,100 feet	55 dBA
1,700 feet	50 dBA

¹Based on a source noise level of 90 dBA
Source: Napa County Baseline Date Report, Noise Section Table 6-13, Version 1, November 2005

Based on distances to existing residences, noise associated with project construction would be anticipated to be 50 to 55 dBA at the nearest existing offsite residence.

Noise related to farming activities and equipment typically ranges from 75 dBA to 95 dBA, with an average of approximately 84 dBA (Toth 1979 and Napa County Baseline Date Report, chapter 6, 2005). Noise sources associated with ongoing vineyard operation and maintenance include a variety of vehicles and equipment, such as track and rubber wheel farming tractors and equipment, which would occur on a temporary and seasonal basis. **Table 10** characterizes the typical reduction of farming activity noise levels as the distance increases from the source using a noise source level of 84 dBA.

Table 10 – Estimated Distance to dBA Contours from Farming Activities¹

Distance from Farming Source	Calculated Noise Level
50 feet	84 dBA
115 feet	75 dBA
175 feet	70 dBA
275 feet	65 dBA
400 feet	60 dBA
650 feet	55 dBA
1,000 feet	50 dBA

¹Based on a source noise level of 84 dBA.
Source: Napa County Baseline Date Report, Noise Section Table 6-14, Version 1, November 2005.

Based on distances to existing residences, it is anticipated that noise due to operation and maintenance agricultural activities is anticipated to be approximately 50 dBA or less at the closest existing offsite residence.

Because the existing ambient noise levels and noise characteristics (including frequency/pitch, amplitude/loudness, duration and tone quality or timber) within both the project site and the immediate vicinity are dominated by existing agricultural operations (including vineyard redevelopment) the proposed project and subsequent operations is not anticipated to result in increases in the ambient noise levels and noise characteristics of the area. Noise levels from routine operation and maintenance activities at the nearest offsite residence is typical for the area, and the temporary and ongoing noise sources and levels are considered typical and reasonable for agricultural development and operational activities, consistent with the County’s “Right to Farm” ordinance, NCC Chapter 2.94 and General Plan Agricultural Preservation and Land Use Policy AG/LU-15, and are therefore exempt from compliance with the noise ordinance. NCC Section 8.16.090.E, Exemptions to Noise Regulations, exempts agricultural operations from noise regulations. Therefore, the proposed project would not result in increases in ambient noise levels or characteristics over what currently exists in the project site and immediate vicinity, resulting in a less-than-significant impact.

- a. The project site is neither located within an area covered by an airport land use plan, nor is it within 2 miles of a public, public-use, or private airport: Napa County GIS: Napa Airport Compatibility Zones and USGS Quad Layers. The closest airports are the Napa Airport and Parrett field in Angwin, which are both over 13 miles from the project site. Therefore, no impact would occur.

Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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XIV. POPULATION AND HOUSING. Would the project:

- a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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- b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Discussion

- a. The proposed project involves earthmoving activities and the installation and maintenance of erosion control measures in connection with the development and cultivation of vineyard. It does not involve the construction of new homes, businesses, or infrastructure, such as water, sewer or utility lines, that would directly or indirectly induce substantial unplanned population growth. Construction and installation activities associated with the proposed project would generate a minimal number of workers to the project site on a temporary basis, and ongoing vineyard operation and maintenance would generate a minimal number of workers to the project site on an ongoing basis. It is anticipated that these workers would come from the existing labor pool in the region. Therefore, the proposed project would not induce unplanned population growth in the project vicinity or greater region, either directly or indirectly. No impact would occur.
- b. The proposed project would not displace any existing housing or people, and it does not involve the construction of new homes. Therefore, no impact would occur.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. PUBLIC SERVICES. Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
i. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
v. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

- a. The proposed project does not include the construction of residential or commercial structures, as discussed in **Section XIV Population and Housing**, resulting in no substantial population growth in the area. It is anticipated that these temporary workers would come from the existing labor pool in the local region and would not result in an increase in population over existing conditions. As a result, there would be no need to construct any new government facilities. Therefore, there would be no change in the demand for the listed services and amenities. No impact would occur.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. RECREATION. Would the project:				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a-b. The proposed project does not include any recreational facilities. As discussed in **Section XIV Population and Housing** and **Section XV Public Services**, the proposed project would not result in substantial population growth, resulting in no increase in the use of recreational facilities and requiring no construction or expansion of recreational facilities. Therefore, no impact would occur.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. TRANSPORTATION. Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Would the project conflict or be inconsistent with CEQA guidelines § 15064.3 subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with General Plan Policy CIR-14, which requires new uses to meet their anticipated parking demand, but to avoid providing excess parking which could stimulate unnecessary vehicle trips or activity exceeding the site's capacity?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a-b. As part of the statewide implementation of Senate Bill, or SB 743, the Governor's Office of Planning and Research, or OPR, settled upon automobile vehicle miles of travel, or VMT, as the preferred metric for assessing passenger vehicle-related impacts under CEQA and issued revised CEQA Guidelines in December 2018, along with a Technical Advisory on Evaluating Transportation Impacts in CEQA to assist practitioners in implementing the CEQA Guidelines revisions.

The County's General Plan Circulation Element contains a policy statement, Policy CIR-7, indicating that the County expects development projects to achieve a 15% reduction in project-generated VMT to avoid triggering a significant environmental impact. Specifically, the policy directs project applicants to identify feasible measures that would reduce their project's VMT and to estimate the amount of VMT reduction that could be expected from each measure. The policy states "projects for which the specified VMT reduction measures would not reduce unmitigated VMT by 15 or more percent shall be considered to have a significant environmental impact." That policy is followed by an action item CIR-7.1 directing the County to update its CEQA procedures to develop screening criteria for projects that "would not be considered to have a significant impact to VMT" and that could therefore be exempted from VMT reduction requirements.

The new CEQA Guidelines and the OPR Technical Advisory note that CEQA provides a categorical exemption (Section 15303) for additions to existing structures of up to 10,000 square feet, so long as the project is in an area that is not environmentally sensitive and where public infrastructure is available. OPR determined that typical project types for which trip generation increases relatively linearly with building footprint, such as general office building, single tenant office building, office park, and business park, generate or attract 110-124 trips per 10,000 square feet. They concluded that, absent substantial evidence otherwise, the addition of 110 or fewer daily trips could be presumed to have a less-than-significant VMT impact.

The County maintains a set of Transportation Impact Study Guidelines, Napa County TIS Guidelines, 2022, that define situations and project characteristics that trigger the need to prepare a TIS. The purpose of a TIS is to identify whether the project is likely to cause adverse physical or operational changes on a County roadway, bridge, bikeway or other transportation facility, to determine whether the project should be required to implement or contribute to improvement measures to address those changes, and to ensure that the project is developed consistent with the County's transportation plans and policies. Per the County's current TIS Guidelines, a project is required to prepare a TIS if it generates 110 or more net new daily vehicle trips.

The TIS Guidelines also include VMT analysis requirements for projects based on trip generation, which includes a screening approach that provides a structure to determine what level of VMT analysis may be required for a given project. For a new project that would generate less than 110 net new daily vehicle and truck trips, not only is the project not required to prepare a TIS, but it is also presumed to have a less-than-significant impact for VMT. However, applicants are encouraged to describe the measures they are taking and/or plan to take that would reduce the project's trip generation and or VMT. Projects that generate more than 110 net new passenger vehicle trips

must conduct a VMT analysis and identify feasible strategies to reduce the project's vehicular travel; if the feasible strategies would not reduce the project's VMT by at least 15%, the conclusion would be that the project would cause a significant environmental impact.

Currently, the project site includes a single-family residence, a second dwelling unit, pool, and associated accessory structures (barn and storage building). An existing access road, Napanook Road, provides access to the project site, which is located at the terminus of Napanook Road approximately 3 miles southwest of its intersection Highway 29 at Madison Street in the Yountville area of Napa County. Trucks, vehicles and other equipment would use County roads or State highways for short periods during construction and subsequent vineyard operation.

Vineyard construction is anticipated to generate up to 10 round trips per day for anticipated work crews of up to 20 employees, including truck trips for equipment and supply delivery. Proposed vineyard operations are anticipated to generate up to approximately 150 truck trips annually. During peak operations, activities such as vineyard pruning, weed and pest control, and harvest are anticipated to generate up to 20 round trips per day, including grape haul trucks, for anticipated work crews of up to 20 employees.

Because the proposed project would be expected to generate up to approximately 10 daily round trips during construction and up to 20 daily round trips for peak operations and maintenance is below the 110-trip threshold in the Office of Planning and Research guidelines and the County's TIS Guidelines and VMT screening criteria, the project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). Impacts would be less than significant.

- c. The proposed project would use the existing access road, Napanook Road, for project development and operation. The proposed project does not include roadway improvements and/or modifications to the existing driveway or Silverado Trail or include any other design feature that would result in hazardous conditions due to a geometric design feature or incompatible uses. The installation of the vineyard is consistent with the allowed use of the project site and other Agricultural Watershed zoned properties as well as agricultural uses in the area. Therefore, the potential for the creation of substantial increase in hazards due to a geometric design feature or incompatible uses would be a less-than-significant impact.
- d. The existing roads would continue to provide adequate emergency access to the project site, resulting in no impact. Refer to **Section IX Hazards and Hazardous Materials**, for additional discussion related to emergency access.
- e. The proposed project would generate its largest demand for parking, approximately 20 vehicles, during harvest, which would occur over approximately 7 days. Current county ordinances do not require formal parking for agricultural projects. Parking at the existing farm center in the holding area and or along existing and proposed vineyard avenues would satisfy parking demands of project installation and subsequent vineyard operations. Therefore, no parking impacts are anticipated.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. TRIBAL CULTURAL RESOURCES. Would the project:				
Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

Notice of the proposed project was sent via certified mail and email to the Mishewal Wappo Tribe of Alexander Valley, the Middletown Rancheria, and the Yocha Dehe Wintun Nation on March 3, 2025.

On March 21, 2025, the Yocha Dehe Wintun Nation responded that the project site is not within their aboriginal territories, and therefore the invitation for consultation was declined: Yocha Dehe identification number YD-03042025-01. The County acknowledged the response in a letter and email dated April 4, 2025, and closed the consultation invitation.

No response to the invitation was received from the Middletown Rancheria. On April 14, 2025, the County sent a consultation closure notice via email and the US Postal Service to the Middletown Rancheria.

No response to the invitation was received from the Mishewal Wappo Tribe, and on April 14, 2025, the County sent a consultation closure notice via email and the US Postal Service to the Mishewal Wappo Tribe. On April 27, 2025, the County received an email from the Mishewal Wappo Tribe in response to the closure notice sent on April 14th requesting consultation. On April 30, 2025, the County had a phone conversation with Scott Gabaldon of the Mishewal Wappo Tribe to discuss measures to incorporate into the project. On May 29, 2025, a follow up letter was sent, via email and the US Postal Service, to memorialize the measures to be included in any action on the application: see **Mitigation Measure TRC-1** below. Because there was agreement on the tribal resource protection measures to be included in the project, consultation has been concluded, which was acknowledged in the letter of May 29, 2025

a-b. As discussed in **Section V (Cultural Resources)** the Cultural Resource Reconnaissance of the project site that was conducted by Flaherty Cultural Resource Service, August 2, 2024, did not identify any significant or potentially significant cultural resources in the proposed development areas.

Through consultation with the Mishewal Wappo Tribe, **Mitigation Measure TCR-1** was developed and will be implemented to ensure that potential impacts on Tribal Cultural Resources, including those that may be eligible for the California Historical Resources Information System or local register, would be less than significant.

Mitigation Measure TCR-1: Prior to the commencement of vegetation removal and earth disturbing activities pursuant to #P24-00213-ECPA the project the owner or permittee shall provide the following to ensure that impacts to Tribal Cultural Resources are minimized or avoided:

- a. Documentation to Napa County demonstrating that the project owner or permittee has engaged with the Mishewal Wappo Tribe of Alexander Valley to provide cultural monitors during project construction as necessary, and that cultural sensitivity training has been provided to site workers.
- b. Should the owner or permittee be unsuccessful in engaging with the Mishewal Wappo Tribe of Alexander Valley, the owner or permittee shall provide, for review and approval by Napa County, a Cultural Monitoring Plan prepared by a professional archaeologist certified by the Registry of Professional Archeologists. The Cultural Monitoring Plan shall outline monitoring requirements including, but not limited to, monitoring schedule as necessary, sensitivity training for site workers, find procedures, and monitoring and reporting procedures.

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

Discussion

- a. The proposed project would generate a minimal number of workers to the project site on a temporary basis during construction, and ongoing vineyard operation and maintenance would generate a minimal number of workers to the project site on an ongoing basis. It is anticipated that these workers would come from the existing labor pool in the region and would not generate an increase in the population relative to the existing conditions. Therefore, the proposed project would not create a need to construct new or modified utilities and service systems. Further, implementation of the proposed project would not result in the construction or expansion of a water or wastewater treatment facility; the proposed project would not generate wastewater, and groundwater would provide irrigation water to the vineyard (see the Groundwater Management, Wells conditions of approval in **Section X Hydrology and Water Quality**). Irrigation pipelines would be located in existing roads, vineyards and vineyard avenues, and/or within the proposed development area.

The proposed project also would include the installation of a limited number of onsite storm water drainage features such as straw wattle sediment barriers, rock level spreader, diversion ditches, drop inlets and associated subsurface drainage lines, rock aprons and rock protect outfalls, and a permanent vineyard cover crop, which have been designed to meet project-related storm water drainage needs. The effect of the proposed storm water drainage features is described in **Sections IV Biological Resources, VII Geology and Soils, and X Hydrology and Water Quality**. As discussed in the referenced sections, the environmental impacts of construction of these features, with incorporation of standard conditions identified in **Sections III Air Quality, V Cultural Resources, IX Hazards and Hazardous Materials, and XVIII Tribal Cultural Resources** would result in a less-than-significant impact.

- b. Typically, the annual irrigation season ranges from late May to September. The proposed vineyard would use approximately 5.6 AF/yr from two existing groundwater wells to irrigate the approximately 7.8 net acres of new vineyard. The WAA prepared by RCS and Associates, **Exhibit D**, concluded that after full development, total long-term groundwater demand for the project site with the new 8.7 net acres of vineyard and existing uses would be 6.7 AF/yr. Based on the 10-year average annual rainfall of approximately 30.5 inches for the project site the annual recharge rate for the project site was calculated to be 15.3 AF/yr. The project groundwater recharge area's estimated groundwater demand of approximately 6.7 AF/yr with the proposed project represents approximately 44% of the average annual groundwater recharge; therefore, the proposed project would have a less-than-significant impact on water supplies. Water availability and water use are discussed in greater detail in **Section X Hydrology and Water Quality**.
- c. The proposed project would generate no wastewater that would require treatment, resulting in no impact on wastewater treatment providers.
- d-e. Rock removed during vineyard development would be stored in an identified rock storage area located off the southeast end of Vineyard Block 2 or used within the proposed development area for the proposed erosion control features. Solid waste generated during construction activities, such as trash, discarded building materials, debris, etc. would be negligible and would be cleared daily, or as necessary. Implementation of the proposed project would include pruning and harvesting activities which would generate waste material. This material would generally be disposed of onsite by spreading it back into the vineyard, burning it in accordance with BAAQMD regulations, or a combination of the two. Therefore, the proposed project would not generate a volume of waste that would need to be disposed of at a landfill that would exceed the permitted capacity of applicable landfills serving the project area. Furthermore, all waste would be disposed of in accordance with federal, state, and local statutes and regulations. Therefore, no impact would occur.

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

Discussion

The project area is located in a State Responsibility Area (SRA) that is designated as a High Fire Hazard Severity Zone: Napa County GIS Fire Protection Responsibility Areas and Fire Hazard Severity Zones-WUI layers. The risk of fire in vineyards due to the proposed project is low due to the limited amount of fuel, combustibles, and ignition sources that would be present. Vineyards are irrigated and cover crops are typically mowed or grazed April through October, thereby reducing the fuel loads within the vineyard. The removal of vegetation and the management of the vineyard may result in an overall reduction of fuel loads within the project site and area as compared to existing conditions. General topography of the site and vicinity consists of moderately to steeply sloped, southern to southeastern facing hillsides between knoll tops that separate the Hopper Creek and Dry Creek Drainages, in which the project site is located. Elevations of the project area range from 400 to 1,050 feet above sea level. Slopes in the project area typically range from 13% to 32%, with an average slope of 22%.

- a. Project construction and operation would not require any road closures and would not substantially increase traffic in the area compared to current conditions. Existing roads would continue to provide adequate emergency access to the project site and project areas. Therefore, the proposed project would not impact an adopted emergency response plan or emergency evacuation plan; no impact would occur. Refer to **Section IX Hazards and Hazardous Materials** for additional discussion related to emergency access.
- b-c. Project construction would require the use of vehicles and heavy equipment for grading and other activities, and these vehicles and equipment could spark and ignite flammable vegetation. During construction, the risk of igniting a fire would be low because vegetation would be cleared prior to developing the vineyard, and the risk would be temporary during project construction. The proposed project does not include any infrastructure that would exacerbate fire risk. Although the project site is in an area that historically has experienced wildfires, the proposed project would not exacerbate wildfire risk, and this impact would be less than significant.
- d. Although the proposed project would alter land cover, temporary and permanent erosion control measures would be implemented for the proposed project which would reduce the impact of stormwater runoff or drainage changes being discharged on or offsite and there would not be an increase in peak flow in the development area (see **Section X [Hydrology and Water Quality]**). Therefore, there are no structures or people that would be exposed to downslope or downstream flooding or landslides as a result of the proposed project and the impact would be less than significant.

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

Discussion

Project impacts have been analyzed to determine potential project-specific and cumulatively considerable significant impacts. All areas of impact analysis were found to have a less-than-significant negative effect on the environment or human beings due to project design with incorporation of identified mitigation measures and conditions of approval.

- a. As discussed in this Initial Study, implementation of #P25-00029-ECPA, with the incorporation of identified mitigation measures and conditions of approval, should the proposed project be approved, would not have the potential to significantly degrade the quality of the environment. Habitat for special-status bird and bat species and foothill yellow-legged frog has been identified in the project site. Implementation of **Mitigation Measures BIO-1** through **BIO-3** would avoid potential impacts to special-status bat species, special-status bird species and protected bird species, and vegetation canopy cover and oak woodlands.

New wildlife exclusion fencing would be located around the proposed vineyard blocks. Given the relatively small size of the project site relative to existing and retained wildlife corridors the project site is in and of itself is unlikely to result in any significant impacts to wildlife movement or migration at the landscape linkage scale. While the proposed project would result in portions of the site having reduced potential for on-site wildlife movement, the fencing would be limited to the vineyard blocks and would avoid riparian corridors along existing streams in the area. As such, the proposed project would not introduce any new movement barriers to wildlife and impacts to wildlife movement are expected to be less than significant, and the range of special-status plant species would not be restricted, cumulative impacts are anticipated to be less than significant.

With the incorporation of the incorporation of **Mitigation Measure TCR-1** and standard conditions to protect cultural and tribal cultural resources that may be discovered accidentally, significant impacts to cultural and tribal cultural resources are not expected: **Section V - Cultural Resources** and **Section XVIII Tribal Cultural Resources**.

The ECPA has been designed to provide setbacks from ephemeral streams typically well in excess of the 35-foot minimum pursuant to NCC 18.108.025(B)(1). Hopper Creek, a U.S. Geological Survey blue-line stream is located approximately 1,350 feet north of the project site. Two unnamed blue-line tributaries to Dry Creek are located approximately 800 feet to the west of the site, the other is within the project site located 65 feet from the project area: **Figure 1** and **Exhibit A**. There are three other minor ephemeral drainages located adjacent to the project area that are associated with this unnamed blue-line stream that have been provide compliant stream setbacks. Therefore, impacts to streams and water quality are not anticipated.

Therefore, the proposed project as designed with the incorporation of **Mitigation Measures BIO-1** through **BIO-3**, **Mitigation Measure TCR-1**, and identified conditions of approval, would have a less-than-significant potential to degrade the quality of the environment or eliminate important examples of the major periods of California history or prehistory.

- b. The parcel is located within two local drainages, Hopper Creek and Dry Creek. Approximately 3-acres of the project occurs in Hopper Creek drainage and approximately 7.5 to 8-acres occurs in the Dry Creek drainage.

The Hopper Creek Drainage area contains approximately 3,002.8-acres. In 1993, vineyard acreage within this drainage was approximately 1,385.3-acres, or 46.1% of the drainage. Since 1993, approximately 162.7-acres of additional vineyard, or 5.4% of the drainage, have been developed to vineyard, resulting in approximately 51.6% of the drainage, or approximately 1,548.0-acres, containing vineyard, resulting in an approximate conversion rate of approximately 5.8% since 1993.

The Dry Creek Drainage contains approximately 9,603.2-acres. In 1993, vineyard acreage within this drainage was approximately 726.5-acres, or approximately 7.6% of the drainage. Since 1993, approximately 240.1-acres of additional vineyard, or 2.5% of the drainage, have been developed to vineyard, resulting in approximately 10.1% of the drainage, or approximately 966.6-acres containing vineyard resulting in a approximate conversion rate of 3.2% since 1993.

It is estimated based on evaluation of the County's GIS layer identifying Potentially Productive Soils within the Hopper Creek Drainage, that there are approximately 293.1-acres, or approximately 9.8% of the drainage having the potential to be developed to vineyard. This, in conjunction with existing and approved vineyard development, approximately 1,548.0-acres, results in a total potential build out of approximately 1,841.1-acres or approximately 61.3.5% of the drainage. Within the Dry Creek Drainage there are approximately 1,859.9-acres, or 19.4% of the drainage having the potential to be developed to vineyard resulting in a total potential build out of approximately 2,826,5-acres or approximately 29.4% of the drainage.

The Potentially Productive Soils layer includes lands with characteristics that have been found to be suitable for potential future vineyard development; however, this total does not take into consideration other site-specific limitations such as water courses requiring setbacks, wetlands, other water features, rare or special-status plants and animal species, or cultural resources, nor does the layer take into account other factors influencing vineyard development, such as sun exposure, soil type, water availability, or economic factors.

While it is not possible to precisely quantify the acreage and location of additional vineyard development that may be proposed by property owners in these drainages in the future, it is possible to make a conservative estimate based on previous trends. To estimate the amount reasonably foreseeable vineyard that may be developed over time, the acreage of vineyard development including approved vineyard projects in the cumulative environment over the last 32 years (1993-2025) were used to project an estimation of vineyard development for the next three to five years.

Over the past 32 years within the Hopper Creek Drainage approximately 5.1-acres of vineyard was developed or approved per year. Combined with Napa County policies and other site selection factors that limit the amount of land that can be converted to vineyard, the development of approximately 15.3 to 25.5-acres of vineyard over the next three to five years within the Chase Hopper Creek drainage are considered reasonable estimates.

Over the past 32 years within the Dry Creek Drainage, approximately 7.5-acres of vineyard were developed or approved per year. Combined with Napa County policies and other site selection factors that limit the amount of land that can be converted to vineyard, the

development of approximately 22.5 to 37.5-acres of vineyard over the next three to five years within the Dry Creek Drainage are considered reasonable estimates.

NCC Chapter 18.108 includes policies that require setbacks of 35 to 150 feet from watercourses (depending on slopes), and General Plan Conservation Policy CON-24c that requires the retention of oak woodland at a 2:1 ratio, which limits the amount of potential vineyard acreage that could be converted within the drainages. It has been the County's experience with ECP projects that there are generally site-specific issues, such as oak woodland preservation, aquatic resource avoidance and buffering, special-status plant and animal species, or cultural resources that have the potential to further reduce areas that can be developed to agricultural or other land uses. Additionally, the vineyard acreage projections for the next three to five years do not consider environmental factors that influence vineyard site selection, such as sun exposure, soil type, water availability, slopes greater than 30%, or economic factors such as land availability, cost of development or investment returns.

Air Quality and GHG – Sections III and VIII:

The proposed project includes the removal of vegetation and installation of vineyard and erosion control measures concurrent with other projects in the San Francisco Bay Area Air Basin that would generate emissions of criteria pollutants, including suspended PM and equipment exhaust emissions. As discussed in **Section III Air Quality** and shown in **Table 5 - Emissions from Vineyard Development and Operation - criteria pollutant emissions associated with development and operations are anticipated to be well below identified thresholds and therefore are not expected to result in project or cumulatively significant impacts. Additionally, the proposed project would be subject to standard air quality conditions of approval (should the proposed project be approved) that requires implementation of Air Quality BMPs to further reduce potential less-than-significant air quality effects of the proposed project and ongoing operation.**

Based on information disclosed and assessed in **Section VIII Greenhouse Gas Emissions**, the project's construction and operational emissions would be below the SMAQMD GHG emissions thresholds of 1,100 MT CO₂e for construction and 1,100 MT CO₂e/year for operations and therefore can be considered less than significant. Potential contributions to air quality impacts associated with the proposed project, including GHG emissions and loss of sequestration, would be considered less than cumulatively significant through project design and implementation of **Mitigation Measure BIO-4** and standard conditions of approval.

With respect to vegetation removal and sequestration loss/gain, as disclosed and assessed in **Section VIII (Greenhouse Gas Emissions)**, considering the project's one-time carbon stock emissions of 551.9 MT CO₂e, and that the overall the proposed project would reduce emissions from changes in carbon stock and sequestration by 22.1 MT CO₂e annually, the carbon stock and sequestration gained from the proposed project results in an increase in net carbon sequestration associated with the project.

Biological Resources – Section IV:

Project-specific biological resources reconnaissance surveys were performed for the proposed project to evaluate potential habitat loss and disturbance to plant and wildlife species because of the proposed project: Wildlife Research Associates, October 2024 and May 2025 – **Exhibit B-1 and B-2**. The surveys included database records searches to identify the presence or potential presence of special-status species within the respective project sites. The database records searches included the USFWS, CNDDDB and CNPS databases.

As discussed in **Section IV (Biological Resources)**, no special-status plant or animal species were identified in the proposed development area. With incorporation of **Mitigation Measures BIO-1 and BIO-2**, special-status and protected birds and bats and associated habitat would be protected or avoided.

Streams, ephemeral drainages, and potential wetlands within the project site have been avoided and provided with setbacks that meet or are in excess of regulatory requirements in NCC Sections 18.108.025 and NCC 18.108.026, and therefore not be affected by the proposed project.

The project site contains approximately 72.4-acres of coast live oak woodland, 3.8-acres of which are proposed for removal because of the project. therefore, up to approximately 24-acres of oak woodland could be removed or at least approximately 48-acres of oak woodland would need to be preserved to comply with Policy CON 24.c. The project proposes removal of approximately 3.8-acres of oak woodland. Therefore, the project would be consistent and compliant with Policy CON24.c.

Regarding vegetative canopy cover, to reduce potential impacts to canopy cover and associated habitat to a less than significant level and achieve consistency with the vegetation canopy cover requirements of NCC Section 18.108.020 **Mitigation Measure BIO-3** will be implemented. no less than 5.1-acres of developable canopy cover and no less than 7.6-acres of oak woodland overall, and include permanent preservation of the area to reduce impacts on vegetation canopy cover to a less-than-significant level and comply with NCC Section 18.108.020,D and Policy CON-24c

Cultural and Tribal Cultural Resources – Sections V and XVIII:

The cultural resources reconnaissance survey prepared by Flaherty Cultural Resource Services, May 2024, did not identify any significant or potentially significant cultural or tribal cultural resources in the proposed development area.

With the incorporation of standard conditions to protect cultural resources that may be discovered accidentally and implementation of **Mitigation Measure TCR-1**, significant impacts to cultural and Tribal Cultural resources are not expected: see **Section V Cultural Resources** and **Section XVII Tribal Cultural Resources**. Therefore, the proposed vineyard development project would have a less than significant project-specific and cumulative impact on cultural and tribal cultural resources.

Geology and Soils – Section VII:

Soil loss and associated sedimentation resulting from implementation of the proposed project is anticipated to be reduced by approximately 6.41 tons a year as compared to existing condition: see **Table 7**. The reasons for this reduction are due to the increased vegetative cover conditions within the proposed vineyard development areas and the installation of erosion control features which reduce soil loss potential. Because the proposed project would reduce soil loss as compared to existing conditions and would be subject to erosion and runoff control conditions of approval, the proposed project is not anticipated to contribute cumulatively to sediment production within the Napa River watershed. Therefore, impacts associated with soil loss and associated sedimentation are not considered cumulatively significant.

Because geologic impacts associated with future agricultural projects would receive the same scrutiny under CEQA and the County's General Plan Goals and Policies, in particular General Plan Conservation Element Policy CON-48, which requires development projects to result in no net increase in sediment erosion conditions and soil loss as compared to existing conditions, it is not unreasonable to anticipate that those projects would also have a less-than-significant project-specific and cumulative impact on erosion and associated sedimentation.

Hazards and Hazardous Materials – Section IX:

The proposed project would implement the identified hazardous materials conditions of approval. Impacts associated with the use, storage, and transport of hazardous materials and accidental release of hazardous materials would be less than significant and no cumulative impacts would occur. It should also be noted that the project does not propose to utilize herbicides as part of ongoing vineyard operations.

Hydrology and Water Quality – Section X:

Water use calculations provided in the Tier 1 and 2 Water Availability Analysis prepared by RCS and Associates, January 2025 - **Exhibit D**- indicate that the proposed development consisting of up to 8 net acres of planted vineyard would result in approximately 5.6 AF/yr of groundwater use, with a total long-term water demand of approximately 6.7 AF/yr in the groundwater recharge area. The proposed project would result in less-than-significant impacts to groundwater supplies, groundwater recharge, and local groundwater aquifer levels given that anticipated annual water use of the proposed project and project well groundwater recharge area is below the anticipated annual groundwater recharge rate screening criteria of approximately 15.3 AF/yr.

As discussed in **Section X, Hydrology and Water Quality**, a Hydrology Analysis was prepared by PPI Engineering, January 2025 – **Exhibit E**. Because the proposed project does not materially alter site slopes or alter existing drainage patterns, no net increase in runoff volumes or time of concentrations are expected as compared to pre-project conditions with the installation and maintenance of the proposed project. Therefore, no significant impacts due to changes in hydrology are expected.

Not increasing runoff rates is consistent with General Plan Conservation Element Policy CON-50c, which requires that peak runoff following development is not greater than predevelopment conditions. Additionally, as discussed in **Section VII (Geology and Soils)** the proposed project is anticipated to decrease soil loss as compared to existing conditions. Therefore, the proposed project would have a less-than-significant impact with respect to alterations of existing drainage patterns of the site or area that would result in increased runoff, considerable on or off-site erosion, siltation, or flooding.

Furthermore, because hydrologic impacts associated with future agricultural projects would receive the same scrutiny under CEQA and County General Plan Policy CON-50(c), which requires development projects to be designed so that peak runoff following development is not greater than predevelopment conditions, it is not unreasonable to anticipate that those projects would also have a less-than-significant project specific and cumulative impact on hydrologic conditions.

Land Use and Planning – Section XI:

As discussed in **Section XI, Land Use and Planning**, the proposed project, with implementation of the mitigation measures and conditions of approval identified in this Initial Study, achieves compliance with applicable NCC requirements and General Plan Goals and Policies. The proposed project would not conflict with any applicable land use plan, policies, or regulation as mitigated and conditioned.

Proposed Project Impacts Found to be Less Than Significant:

In addition to the impact categories identified above, the following discussion summarizes those impacts considered to be less than significant with development of the proposed project: Aesthetics, Agriculture and Forestry Resources, Energy, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Transportation, Utilities and Service Systems, and Wildfire. Periodic use of lighting at the site would not create a substantial source of light and lighting would be in the form of heat lights or downward directional lights on equipment being used during nighttime harvest. The potential contribution to aesthetic impacts associated with the proposed project is considered to be less than cumulatively considerable. The proposed project would not result in wasteful, inefficient, or unnecessary energy use, or conflict with or obstruct a state or local plan for renewable energy or energy efficiency or impede progress towards achieving goals and targets. There are no known mineral resource areas within the proposed project site or immediate vicinity. This project would generate noise levels that are considered normal and reasonable for agricultural activities and consistent with the County's "Right to Farm" Ordinance. The potential contribution to noise or vibration impacts is considered less than cumulatively considerable. Traffic related to construction and farm worker trips would not increase by a discernible amount and the relatively low and off-peak vehicle trips associated with the proposed project are considered less than cumulative considerable. The proposed project does not include the construction of structures that would result in population growth or displacement of people and would not adversely impact current or future public services. For these reasons, impacts associated with the proposed project that may be individually limited, but cumulatively considerable, would be less than significant.

Considering the project site's characteristics, surrounding environment, and the scope and scale of the proposed project, the proposed project with incorporation of identified mitigation measure and conditions of approval, as discussed throughout this Initial Study, is not anticipated to result in either project specific or cumulatively considerable negative impacts; therefore, impacts associated with the proposed project that may be individually limited, but cumulatively considerable, would be less than significant.

- c. Implementation of the proposed project would not have any potentially significant negative effects on human beings (see discussions under **Sections III, Air Quality, IX Hazards and Hazardous Materials, X Hydrology and Water Quality, XIII Noise, XIV Population and Housing, XVII Transportation, and XX Wildfire**). The proposed project, the use of the project site, and reasonably foreseeable projects would be activities at a level of intensity considered normal and reasonable for a property within an Agricultural Watershed zoning district. Therefore, less-than-significant impacts on human beings are anticipated.

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