

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:** Keller Yountville Vineyard LLC., Agricultural Erosion Control Plan Application File #P25-00080-ECPA
2. **Property Owner:** Keller Yountville Vineyard LLC.
3. **Contact Person, Phone Number and Email:** Donald Barrella, Principal Planner, 707-299-1338, donald.barella@countyofnapa.org
4. **Project Location and Assessor's Parcel Number:** 275 Long Ranch Road, Saint Helena, CA 94574, **Figures 1 and 2**
Assessor's Parcel Number 032-030-070
Sections 18, Township 7 North Range 4 West, Mt. Diablo Base and Meridian
Latitude 38° 27' 34" N, Longitude 122° 20' 19" W
5. **Project Sponsor:** Keller Yountville Vineyard LLC
Care of: James Keller
P.O. Box 546
Napa, CA 94559
Agent: Michael R. Muelrath, RPE #67435
Applied Civil Engineering Incorporated
2160 Jefferson Street, Suite 120
Napa, CA 94559
6. **General Plan Designation:** Agriculture, Watershed and Open Space
7. **Zoning:** Agricultural Watershed
8. **Description of Project:** The proposed project involves the clearing of vegetation, earthmoving and land contouring, and installation and maintenance of erosion control measures associated with the development of approximately 16.7 gross acres of vineyard (i.e., proposed development area or project area) with approximately 14.0 net planted acres in three vineyard blocks (Blocks A through C), located on an approximately 152.6-acre property (i.e., project site). The acreages of each of the three vineyard blocks are indicated in **Table 1**.

Table 1 – Proposed Vineyard Block Acreage

Block	Net Acreage	Gross Acreage
A	9.9	11.3
B	3.0	3.7
C	1.1	1.7
Total	14.0	16.7

Source: Applied Civil Engineering Inc., 2025 – **Exhibit A-1**

The estimated quantity of grading is approximately 5,000 cubic yards of cut and 5,000 cubic yards of fill; an earthwork balance would be achieved onsite. Rock removed during vineyard development would be used for downslope vineyard avenues or would be buried. Short-term stockpiles, if needed, would be located within the proposed development area; no long-term stockpiles are proposed. There would be no transportation of spoils off-site. The proposed vineyard would be irrigated with water from an existing onsite well with an anticipated water demand for irrigation and heat protection of approximately 10.5 acre-feet per year (AF/yr). Irrigation pipelines would be located in roads, vineyards and vineyard avenues, and/or within the proposed development area (**Exhibits A-1 and A-2**).

The proposed project would include the placement of new wildlife exclusion fencing around proposed vineyard Blocks B and C which would connect to existing wildlife exclusion fencing on-site (**Exhibit A-1**).

Erosion Control Measures: Temporary erosion control measures include installation of fiber rolls/wattle sediment barriers, silt fences, erosion control blankets, water bars, and straw mulch applied at 3,000 pounds an acre on areas with a slope greater than 5 percent (%) and other practices as needed. Permanent erosion control measures include energy dissipaters, rock filled avenues, and a permanent cover crop to achieve minimum density of 75% for proposed vineyard Block A and 80% for proposed vineyard Blocks B and C. Details of the proposed erosion control measures are provided in the Keller Yountville Vineyard LLC Track I Erosion Control Plan (dated August 7, 2025) prepared by Michael R. Muelrath (RPE #67435) of Applied Civil Engineering Inc., Napa County, California (**Exhibits A-1 and A-2**).

Earthmoving: Earthmoving and grading activities associated with the land contouring and the installation of erosion control measures and subsequent vineyard operations include, but are not limited to, vegetation removal, soil ripping, rock removal and processing, disking, recontouring, incorporation of soil amendments, construction of vineyard access roads to connect development areas, 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 rootstock in a 7-foot by 4-foot spacing pattern for an approximate vine density of approximately 1,556 vines per acre, and a total of approximately 21,780 vines.
- b. Ongoing inspection and maintenance of temporary and permanent erosion and runoff control measures.
- c. Ongoing operation and maintenance of the vineyard, which includes vine management (pruning, fertilization, and pest and disease control), weed control, cover crop mowing, irrigation and trellis system maintenance, and fruit harvesting. The management regime of the no-till cover crop would consist of mowing and late winter or early springtime strip spraying in an 18-inch-wide strip by contact or systemic herbicides; no pre-emergent spraying would be utilized as part of cover crop management.

Table 2 lists a general schedule for the construction of the proposed project as identified in #P25-00080-ECPA and **Table 3** outlines typical general ongoing vineyard operations. The vineyard would be developed in two phases, with construction occurring for up to six months during the year. The final implementation schedule is pending action on #P25-00080-ECPA.

Table 2 – Implementation Schedule

April 1 – September 1 ¹	Remove existing vegetation, complete ripping, grading and disking, planting
September 15 ²	All winterization complete, including seeding, straw mulching, and straw wattle installation.
September 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 During the winter months in municipal watersheds (September 1 to April 1 of the succeeding year), no earthmoving work is allowed by the Napa County Code (NCC) Sections 18.108.027(C) and 18.108.070(L).

² All winterization measures must be in place by September 15 of any given year in municipal watersheds pursuant to NCC Section 18.108.027(C).

Table 3 – Typical Annual Operations Schedule

January to February	a. Prune vines.
March to August	a. Sulfur application to protect against mildew. b. Mow cover crop. c. Weed control.
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 12 vehicle trips per day for anticipated work crews of up to 5 employees during the land development, with up to 175 delivery trips (**Exhibit A-3**). Erosion control work is anticipated to generate 10 vehicle trips per day for anticipated work crews of up to 16 employees with up to 32 delivery trips. Vineyard planting is anticipated to generate 10 vehicle trips per day for anticipated work crews of up to 16 employees, with up to 32 delivery trips. Anticipated construction equipment would be limited to tracklaying and rubber-tired vehicles and could include bulldozers, tractors, excavators, tub grinders, haul trucks, water trucks, loaders, skid steers, and passenger vehicles and/or light trucks.

Typical operations include, but are not limited to, irrigation and trellis system inspection and repair, cover crop inspection and management, erosion control measure monitoring and maintenance, and vine/vineyard inspection, 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 10 vehicle trips per day for anticipated work crews of up to 16 employees, with up to 60 delivery trips annually (**Exhibit A-3**). Anticipated equipment for vineyard operations would be limited to manual hand tools and ATVs.

Implementation of the proposed project would be in accordance with the Keller Yountville Vineyard LLC Track I Erosion Control Plan prepared by Applied Civil Engineering Inc. (August 2025 – **Exhibits A-1 and A-2**). 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 approximately 152.6-acre project site (APN 032-030-070) includes the addresses 275 & 279 Long Ranch Road and is approximately 3.8 miles northeast of the Town of Yountville, California (**Figures 1 through 3**). Long Ranch Road is a paved driveway that would provide access to the proposed development area. Existing improvements on the project site include a residence, two guest houses, a garage, 6.2 acres of

existing vineyard¹, paved, gravel and dirt roads, two groundwater wells (one located in the northern portion of the project site and one located near the center of the project site), concrete water tanks, a septic system, and the related water and power utility infrastructure serving the existing uses.

Regarding the 6.2 acres of existing vineyard, it occurs on slopes of less than 5% and are exempt from the need for an Erosion Control Plan pursuant to NCC Section 18.108.030 that defines an Erosion Hazard Area as those portions of parcels of land having slopes over five percent and NCC Section 18.108.070(B) - Erosion Hazard Areas use requirements – that specifies ‘no otherwise permitted agricultural earthmoving activity, grading, or improvement, shall commence on slopes over five percent until an erosion control plan which complies with NCC Section 18.108.080 and been approved by the director, and is therefore not part of the proposed project. Several of the technical reports for the proposed project were completed prior to or concurrent with the development of the 6.2-acres of vineyard and therefore in some cases the technical reports for the proposed project discuss these areas as under development or as developed land rather than vineyard.

An existing fuel break runs through the project site from the southwest to the northeast. There are two areas designated for preservation of special-status plant habitat onsite and serve as habitat mitigation for prior development on an adjacent parcel (APN 032-030-071) associated with Red Dirt Grapes Vineyard (#P22-00143-ECPA) located to the northwest of the project site; these preservation areas total approximately 29.3 acres of the project site (**Exhibit A-1 and B-1**). The total preservation area for Red Dirt Grapes Vineyard (#P22-00143-ECPA) included 68.1 acres of habitat that included that site’s sensitive biotic communities and special-status plant species habitat and areas removed from development due to mitigation Located on parcels 032-030-071^{SFAP} with 032-560-038 (Lands of Red Dirt Grapes), and 032-030-070 and 032-560-037 (Lands of Keller Yountville Vineyard LLC.) (Instrument #2024-0007763, recorded June 3, 2024).

The project site is located adjacent to vineyards to the north and open space to the south, west, and east. The project site is in the hillsides adjacent to the Napa Valley on the eastern side of Napa County. The general topography in the vicinity of the project site consists of the rolling mountains. Average slopes in the proposed development area range from 4% to 26%, with an overall average slope of 16%; approximately 0.8 acre is on slopes over 30%. Elevations in the project site range from approximately 700 feet above mean sea level at the western side of the project site to approximately 1,300 feet above mean sea level at the eastern side of project site.

Soils in the proposed development area have been classified according to the Soil Survey of Napa County (USDA 1978) as Boomer gravelly loam, volcanic bedrock, 14 to 60% slopes and Rock outcrop-Hambright complex, 50 to 75% slopes. There are no landslide deposits mapped on the project site, although there are potential landslide areas located in the vicinity. The closest active faults are located approximately 8.1 mile west and 10.1 miles south of the project site (Napa County GIS faults and earthquakes layer).

The project site is located within the Vine Hill Creek drainage and the Rector Reservoir Rector Reservoir Sensitive Domestic Water Supply drainage, both of which flow into the Napa River which ultimately flows to San Pablo Bay. Only approximately 0.5-acres of the proposed development is located in Rector Reservoir Drainage. One unnamed blue-line stream is located in the northern portion of the project site and flows to Lake Hennessey. A second blue-line stream is located in the southern portion of the project site and flows to the Napa River. An unnamed blue-line stream is located just to the east of the project site which flows to Rector Reservoir. There are also several ephemeral streams in the western and southern portions of the project site.

The vegetation types on the project site include chamise chaparral, scrub oak chaparral, eucalyptus (i.e. blue gum) grove, and vineyard.

- 10. Background:** On April 8, 2025, the Town of Yountville and the Veterans Home of California (Yountville) water purveyors for the Rector Reservoir Sensitive Domestic Water Supply Drainage, were notified of this application pursuant to NCC Section 18.108.027(E). No responses were received from either the Town of Yountville or the Veterans Home of California regarding this project.
- 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?

¹ The 6.2 acres of vineyard are on slopes of less than 5% and are exempt from the need for an Erosion Control Plan and are not part of the proposed project. Several of the technical reports for the proposed project were completed prior to the development of the 6.2 acres of existing vineyard and therefore in some cases the technical reports for the proposed project discuss these areas as under development.

Notice of the proposed project was sent certified mail to the Mishewal Wappo Tribe of Alexander Valley, Middletown Rancheria, and the Yocha Dehe Wintun Nation on April 8, 2025.

On April 15, 2025, an email response from the Mishewal Wappo Tribe was received requesting consultation. On April 17, 2025, the County acknowledged receipt of the request for consultation. On April 23, 2025, the County sent a follow-up email to the Tribe that included the mitigatory/conditional provision that would be incorporated into the project should it be approved, and if any edits, inclusions, or comments on the proposed provision were necessary. No response to the County's April 23, 2025, email has been received.

On May 13, 2025, Yocha Dehe responded that the project site is not within the aboriginal territories of the Tribe, and therefore the invitation for consultation was declined; the County acknowledged the response in a letter dated May 28, 2025, and closed the consultation invitation.

No request for consultation was received from Middletown Rancheria and more than 30 days had elapsed since the County's consultation invitation was provided; therefore, the County sent a consultation closure letter to the Tribe dated May 28, 2025. However, on September 4, 2025, an email request to consult in response to the May 28, 2025, invitation closure was received from Middletown, requesting the County to include mitigation measures for the project, should it be approved. On September 4, 2025, the County sent a follow up email communication to the Tribe acknowledging the Tribe's request to consult, included the mitigatory/conditional provision that would be incorporated into the project should it be approved and if any edits, inclusions, or comments on the proposed provision. No response was received to the County's September 4, 2025, email A follow up email was sent by the County on September 16, 2025; however, no response was received.

The mitigatory/conditional provision based on communications is discussed and detailed in **Section XVIII (Tribal Cultural Resources)**.

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 #P25-00080-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 <https://www.pb.es.cloud/index.php/s/TRmbszLNGbaByPb>.

- Applied Civil Engineering, August 7, 2025, Keller Yountville Vineyard LLC, Vineyard Development Erosion Control Plan, Overall Site Plan (**Exhibit A-1**)
- Applied Civil Engineering, Undated, Keller Yountville Vineyard LLC, Vineyard Development Erosion Control Plan, Erosion Control Plan Narrative (**Exhibit A-2**)
- Applied Civil Engineering, Undated, Vineyard Development & Operations Traffic and Practice (**Exhibit A-3**)
- Wildlife Research Associates, March 2025, Biological Resources Reconnaissance Survey, 275 Long Ranch Road, Napa County, California (**Exhibit B-1**)
- Wildlife Research Associates, June 11, 2025, Keller Yountville Vineyard, Napa County ECPA - Response to Napa County Comments on Biological Resources (File #P25-00080-ECPA) (**Exhibit B-2**)
- Applied Civil Engineering, March 14, 2025, Keller Yountville Vineyard LLC, Vegetation Retention Analysis - 1993 (**Exhibit B-3**)
- Archaeological Research Service, February 28, 2024, Archaeological Resource Management Report for the Proposed Vineyard Development at 275 Long Ranch Road, St. Helena, Napa County, California (APN 032-030-070) (contents confidential)
- RGH Consultants, April 30, 2025, Landslide Hazard Evaluation, Keller Yountville Vineyard, 275 Long Ranch Road, APN 032-030-070, Saint Helena, California (**Exhibit C**)
- David Steiner, Certified Professional Soil Erosion and Sediment Control Specialist No. 770, March 14, 2025, Soil Loss Analysis, Revised, Keller Vineyard, New Vineyard Development, 275 Long Ranch Road, St. Helena, CA 94574, APN 032-030-070 (**Exhibit D**)
- Richard C. Slade & Associates LLC, May 8, 2025, Tier 1 Water Availability Analysis for a Vineyard Expansion Project at 275 Long Ranch Road, St Helena, Napa County, CA 94574 (**Exhibit E**)
- Michael R. Muelrath, Registered Professional Engineer No. 67435, David Steiner, Certified Professional Spoil Erosion and Sediment Control Specialist No. 770, May 15, 2025, Hydrologic Analysis, Revised, Keller Vineyard, New Vineyard Development, 275 Long Ranch Road, St. Helena, CA 94574, APN 032-030-070 (**Exhibit F**)
- Site inspection conducted by Napa County Planning, Building and Environmental Services, Engineering and Conservation Division staff (Ginevra Augustini and Donald Barrella) on April 15, 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 G** 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

May 7, 2026

 Date

Donald Barrella

 Printed Name

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 located along Long Ranch Road and is not located adjacent to a designated scenic corridor; the closest designated County viewshed road is Silverado Trail, and the project site is approximately 1.3 miles east of the scenic corridor associated with Silverado Trail (Napa County GIS, Viewshed roads and Scenic Corridors Layers; Baseline Report, Chapter 12, 2005). However, due to the distance, topography and existing vegetation, the project site is not visible from Silverado Trail. Additionally, the proposed use is vineyard, which is a common visual land use aesthetic in the hillsides of Napa County along Silverado Trail. The addition of 14 net acres of vineyard would be consistent within the surrounding environment which consists primarily of agriculture (vineyard) and open space. The project site is not located within the vicinity of an officially designated State scenic highway; State Route 128, which is listed as eligible, is the closest and it is approximately 1.8 miles to the north (Napa County GIS Road Layer; California State Scenic Highway System Map). The project site is in the Napa Valley Agricultural Watershed (AW) zoning district which is dominated by vineyards and typifies the visual character of the area (Napa County GIS, Zoning Districts Layer).

The project site is not located on a prominent hillside or a major or minor ridgeline (Napa County GIS, Ridgelines Layer). The 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. Further, the proposed project does not include the removal of trees within the proposed development area (**Exhibit A-1**).

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 site and surroundings.

d. Proposed agricultural operations on the project site would require some lighted nighttime activities consistent with the nighttime activity already occurring on the project site and in the surrounding area, which includes vineyard and agricultural uses. Lighting would be in the form of headlights or downward direction lights on equipment being used during nighttime harvest. The proposed project would include harvest activities (typically occurring in September), that could include nighttime activity (typically between 12 a.m. and 6 a.m.) approximately 5 days per year. Other nighttime activities would include sulfur and pesticide/herbicide application (typically between 12 a.m. and 6 a.m.) approximately 12 days per year. Although some nighttime activity would occur for limited periods, the proposed project would not introduce a new source of substantial light or glare, and the type of nighttime lighting would be consistent with existing project site uses and surrounding land uses. 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 Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 does not include areas mapped as Prime Farmland, Unique Farmland, Farmland of Statewide Importance, Farmland of Local Importance, and Grazing Land by the California Department of Conservation (California Important Farmland Finder²). 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 is designated Agriculture, Watershed and Open Space (AWOS) by the General Plan and is zoned Agricultural Watershed (AW) (Napa County GIS Zoning Layer). Therefore, the establishment of vineyard totaling approximately 16.7 gross acres with approximately 14 net planted acres is consistent with project site's land use and zoning designations. The project site does not have a Williamson Act contract associated with it (Napa County GIS, Williamson Act Parcels). The proposed project would not convert any land within the project site to non-agricultural use; 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 forests 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 Zoning Layer). The project site is zoned as Agricultural Watershed 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 (TPZ) as defined in Government Code Section 51104(g). Therefore, no impact would occur.

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

- e. The proposed project would not construct new roads to the project site and construction of the proposed vineyard would not result in the conversion of existing farmland or forestland to non-agricultural or non-forestland uses. As such, the proposed project would have no impact on agricultural or forest resources of Napa County.

	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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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 (GHG) emissions disclosure and impact assessment.

The project site is generally located along the eastern side of Napa Valley, within the Napa County climatological subregion of the San Francisco Bay Area Air Basin (SFBAAB), which is under the jurisdiction of the Bay Area Air District (BAAD), or Air District, previously known as the Bay Area Air Quality Management District (BAAQMD). The Air District has published CEQA guidance titled *CEQA Air Quality Guidelines* (2022; referred to as 2022 CEQA Guidelines) to assist lead agencies in evaluating air quality and climate impacts from proposed land use projects and plans.³ The 2022 CEQA Guidelines are advisory for local and regional governments in the San Francisco Bay Area Air Basin (SFBAAB). They contain nonbinding recommendations for how a lead agency can measure, evaluate, and mitigate air quality and greenhouse gas (GHG) impacts generated from land use construction and operational activities.

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

- a. The project site is generally located in the eastern side of the Napa Valley, within the Napa County climatological subregion of the San Francisco Bay Area Air Basin, which is under the jurisdiction of the Bay Are Air District. 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 vegetation. 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 going to and from the site and 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 (PM₁₀), fine particulate matter less than 2.5 microns (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 designated for the federal 8-hour ozone standard, state 1-hour and 8-hour ozone standards, state annual and 24-hour

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](https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines).

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 (ROG) and oxides of nitrogen (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).⁴ 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 toxic air contaminants (TACs); reduce emissions of methane and other “super-GHGs”⁵ that are potent climate pollutants in the near-term; and decrease emissions of carbon dioxide by reducing fossil fuel combustion.⁶

The Air District's current guidance requires consideration of the following questions in determining whether a project is consistent with an air quality plan. If all three questions are answered in the affirmative with substantial evidence provided in support of the answer, the project would be considered to be consistent with the clean air plan.

- 1) For each applicable air quality plan, does the project support the primary goals?
- 2) For each applicable air quality plan, does the project include all applicable control measures?
- 3) For each applicable air quality plan, does the project not disrupt or hinder implementation of any control measures?

The Air District's recommended guidance for determining if a project supports the goals of the current Clean Air Plan is to compare project-estimated emissions with its 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.

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 vegetation⁷. In the long term, potential air quality impacts may 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.

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.

4 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?la=en.

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

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?la=en.

7 Assuming burning to be conservative.

- b. The 2022 CEQA Guidelines provide thresholds of significance for air quality impacts from both construction and operation. According to the Air District, 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 –Thresholds of Significance for Construction and Operation

Pollutant	Construction	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	Best management practices (BMPs)		None

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

For construction-related emissions of fugitive dust, the Air District recommends that lead agencies take a qualitative approach to determine impact significance; the 2022 CEQA 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 the Air District’s 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 conducted: Stagecoach North Vineyards⁸ for an approximately 91-acre vineyard development, KJS and Sorrento Vineyard⁹ for an approximately 111.5-acre vineyard development, and Le Colline Vineyards¹⁰ for an approximately 28-acre vineyard development¹¹.

All three vineyard projects involved similar activities associated with 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 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.

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 16.7 gross acres of vineyard. Vineyard construction is anticipated to generate 12 vehicle trips per day for anticipated work crews of up to 5 employees during the land development, with up to a total of 175 delivery trips over the construction period (**Exhibit A-3**). Erosion control work is anticipated to generate 10 vehicle trips per day for anticipated work crews of up to 16 employees with up to 32 delivery trips. Vineyard planting is anticipated to generate 10 vehicle trips per day for anticipated work crews of up to 16 employees, with up to 32 delivery trips. Anticipated construction equipment would be limited to tracklaying and rubber-tired vehicles and could include typical vineyard construction equipment such as bulldozers, tractors, excavators, tub grinders, haul trucks, water trucks, loaders, skid steers, and passenger vehicle and/or light trucks.

Daily construction emissions associated with the proposed project’s 16.7 gross acre vineyard development were estimated using the average pounds per day per acre estimated for the three vineyard projects described above and are shown in **Table 5**. As shown in **Table 5**, short-term construction would not exceed the Air District’s daily construction threshold for any criteria air pollutants for which the project region is non-attainment under an applicable federal or state ambient air quality standard.

8 #P18-00446-ECPA, November 2022, SCH #2019100250
9 #P17-0432-ECPA, March 2023, SCH #2018092042
10 #P14-00410-ECPA, December 2022, SCH #2016042030

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

Table 5 – Emissions from Vineyard Development and Operation

Emissions and Thresholds	Construction Emissions			
	ROG	NO _x	PM ₁₀	PM _{2.5}
Stagecoach North vineyard ¹ (pounds per acre per day)	0.08	0.75	0.03	0.03
KJS and Sorrento vineyard ² (pounds per acre per day)	0.05	0.42	0.02	0.02
Le Colline vineyard ³ (pounds per acre per day)	0.24	2.33	0.10	0.09
Average (pounds per acre per day)	0.12	1.17	0.05	0.05
Project Construction Emissions based on Average (pounds per day)	2.01	19.49	0.82	0.76
Construction threshold	54	54	82	54
Significant?	No	No	No	No
Emissions and Thresholds	Operational Emissions ^{4, 5}			
Stagecoach North 91-acre vineyard operation ¹ (pounds per acre per day)	0.01	0.08	0.01	<0.01
KJS and Sorrento 111.5-acre vineyard operation ² (pounds per acre per day)	<0.01	<0.01	<0.01	<0.01
Le Colline 28.5-acre vineyard operation ³ (pounds per acre per day)	<0.01	<0.01	<0.01	<0.01
Average (pounds per acre per day)	<0.01	0.03	<0.01	<0.01
Project Operational Emissions based on Average (pounds per day)	0.17	1.65	0.17	<0.01
Operational threshold (pounds per day)	54	54	82	54
Significant?	No	No	No	No
Operational Emissions ⁴ (tons per year)				
Stagecoach North 91-acre vineyard operation ¹ (tons per year)	<0.01	0.01	<0.01	<0.01
KJS and Sorrento 111.5-acre vineyard operation ² (tons per year)	<0.01	<0.01	<0.01	<0.01
Le Colline 28.5-acre vineyard operation ³ (tons per year)	<0.01	0.01	<0.01	<0.01
Average (tons per year)	<0.01	<0.01	<0.01	<0.01
Project Operational Emissions based on Average (tons per year)	0.03	0.29	0.03	0.02
Operational threshold (tons per year)	10	10	15	10
Significant?	No	No	No	No

Note: Totals may not add up due to rounding, typically values used in the V-CESS calculator extend out to the thousands place (or 0.00).

1 As identified in Stagecoach North IS/MND.

2 As identified in KJS and Sorrento IS/MND.

3 As identified in Le Colline Vineyard IS/MND.

4 Includes dust and exhaust emissions.

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 CEQA Guidelines April 2023.

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 Air District’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 should be provided for construction workers at all access points.
- h. Unpaved roads providing access to sites located 100 feet or farther from a paved road shall be treated with a 6- to 12-inch layer of compacted layer of wood chips, mulch, or gravel.

- i. 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.
- j. 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 Air District's jurisdiction shall have either a California Air Resources Board (ARB) registration Portable Equipment Registration Program (PERP) or an Air District permit. For general information regarding the certified visible emissions evaluator or the registration program, visit the ARB FAQ¹² or the PERP website¹³.

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 four round trips per day for anticipated work crews of up to 16 employees. Anticipated equipment for vineyard operations would be limited to manual hand tools and ATVs. Vineyard operations would be similar to the other three vineyard projects discussed above whose operational emissions were found to be below thresholds. As shown in **Table 5**, operational emissions associated with the proposed project would also be well below both the daily and annual operational thresholds.

Project-level thresholds used in the analysis above represent emission levels above which a project's individual emissions would result in a cumulatively considerable contribution to the SFBAAB's existing air quality conditions. The thresholds would be an evaluation of the incremental contribution of a project to a significant cumulative impact. As the proposed project's emissions would be below thresholds for construction and operation, the project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. This impact would be less than significant with mitigation.

- 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.

There are no schools within 0.25 miles of the project site. The closest schools, St. Helena Co-Op Nursery is located approximately 4.5 miles to the northwest of the project site (Napa County GIS, Schools Layer). The nearest residences to the project site are located approximately 0.5 miles to the northeast.

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 be located approximately 4.5 miles from the closest school and approximately 0.5 mile from the nearest rural residence. Because construction sources would temporarily occur in two phases with construction occurring for up to six months during the year, and operational sources are seasonal in nature, the proposed 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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>

¹² http://www.arb.ca.gov/portable/perp/perpfaq_04-16-15.pdf

¹³ <http://www.arb.ca.gov/portable/portable.htm>

- d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?
- e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?
- f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Discussion

The following sources were used in this analysis and are incorporated herein by reference and available in the project file for review:

- Wildlife Research Associates, March 2025, Biological Resources Reconnaissance Survey, 275 Long Ranch Road, Napa County, California (**Exhibit B-1**)
- Wildlife Research Associates, June 11, 2025, Keller Yountville Vineyard, Napa County ECPA - Response to Napa County Comments on Biological Resources (File #P25-00080-ECPA) (**Exhibit B-2**)
- Applied Civil Engineering, March 14, 2025, Keller Yountville Vineyard LLC, Vegetation Retention Analysis – 1993 (**Exhibit B-3**)

Wildlife Research Associates conducted an assessment of biological resources present or potentially present at the project site and in the proposed development area. Biological resource surveys were conducted on May 12, May 19, June 8, and June 27, 2023. 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, 2025) and California Native Plant Society (CNPS) Electronic Inventory (CNPS, 2025). The CNDDDB and CNPS database searches included the Saint Helena, Chiles Valley, Lake Berryessa, Rutherford, Yountville (focal), Capell Valley, Sonoma, Napa, and Mount George USGS 7.5-minute quadrangles.

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. Vegetation communities were delineated based on distinct shifts in plant assemblage (vegetation) and follow the California Natural Community List (CDFW, 2023), Preliminary Descriptions of the Terrestrial Natural Communities of California (Holland, 1986), and A Manual of California Vegetation, Online Edition (CNPS, 2025).

The vegetation types in the project site include chamise chaparral, scrub oak chaparral, blue gum grove, vineyard and developed (Wildlife Research Associates, March 2025 – **Exhibit B-1**). The vegetation types and their acreages in the project site and proposed development area are shown in **Table 6**. The developed acreage has been adjusted to account for the 6.2-acres that was in the process of being developed during application processing as identified in the Setting Section of this initial study (pages 2-3).

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

Vegetation Types	Approximate Pre-Project Acres in Project Site	Approximate Acres in Proposed Development Area
Chamise Chaparral	96.1	9.2
Scrub Oak Chaparral	35.7	6.0
Blue Gum Grove	3.8	0
Vineyard	6.2	0
Developed	10.5	1.5
Total	152.3	16.7

Source: Wildlife Research Associates, March 2025 – **Exhibit B-1**

- a. **Special-Status Plants:** Based upon a review of the biological resource databases listed in **Exhibit B-1**, 78 special-status plant species have been documented in the vicinity of the project site. Of those, 26 species have a moderate to high chance to occur in the project site, including: narrow-anthered brodiaea (*Brodiaea leptandra*), holly-leaved ceanothus (*Ceanothus purpureus*), Greene’s narrow-leaved fleabane (*Erigeron greenei*), Sharsmith’s western flax (*Hesperolinon sharsmithiae*), Napa biscuitroot (*Lomatium repostum*), green monardella (*Monardella viridis*), Franciscan onion (*Allium peninsulare* var. *franciscanum*), twig-like snapdragon (*Antirrhinum virga*),

Howell's broomrape (*Aphyllon valid* ssp. *howellii*), modest rock-cress (*Arabis modesta*), Rincon manzanita (*Arctostaphylos stanfordiana* ssp. *decumbens*), Brewer's milk-vetch (*Astragalus breweri*), Clara Hunt's milk-vetch (*Astragalus claranus*), Brewer's calandrinia (*Calandrinia breweri*), Rincon Ridge ceanothus (*Ceanothus confuses*), Calistoga ceanothus (*Ceanothus divergens*), Sonoma ceanothus (*Ceanothus sonomensis*), St. Helena fawn lily (*Erythronium helenae*), nodding harmonia (*Harmonia nutans*), bristly leptosiphon (*Leptosiphon aureus*), Jepson's leptosiphon (*Leptosiphon jepsonii*), redwood lily (*Lilium rubescens*), Cobb Mountain lupine (*Lupinus sericatus*), Mt. Diablo cottonweed (*Micropus amphibolus*), dark-mouthed triteleia (*Triteleia lugens*), and oval-leaved viburnum (*Viburnum ellipticum*). The biological 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, identified six special-status plant species (narrow-anthered brodiaea, holly-leaved ceanothus, Greene's narrow-leaved fleabane, Sharsmith's western flax, Napa biscuitroot, and green monardella) in the project site (Wildlife Research Associates, March 2025 – **Exhibit B-1**).

Narrow-anthered brodiaea: Narrow-anthered brodiaea is a perennial herb in the brodiaea family (Themidaceae) that blooms from May to July. It typically occurs in broadleaf upland forest, chaparral, and lower montane coniferous forest habitat at elevations ranging from 360 to 3,000 feet. Soil survey data from documented locations suggest this species is associated with gravelly loam and clay loam substrates derived from rhyolites, metavolcanics, and serpentine. Several populations of narrow-anthered brodiaea were observed in the central portion of the project site within chaparral land cover type. Approximately 250 individuals of this species were observed, occupying approximately 0.5 acre of the project site, including approximately 0.1 acre in the proposed development area.

Holly-leaved ceanothus: Holly-leaved ceanothus is an evergreen shrub in the buckhorn family (Rhamnaceae) that blooms from February to April but is usually identifiable by vegetative structures throughout the year. It typically occurs on rocky slopes underlain by volcanic substrates in chaparral and cismontane woodland habitat at elevations ranging from 390 to 2080 feet. Holly-leaved ceanothus was observed throughout most of the project site within chaparral land cover type. Roughly 6,500 individuals of this species were observed or otherwise assessed to be present within approximately 82.7 acres, including approximately 16.2 acres in the proposed development area.

Greene's narrow-leaved fleabane: Greene's narrow-leaved fleabane is a perennial forb in the sunflower family (Asteraceae) that blooms from May to September. It typically occurs on rocky substrate derived from volcanics or serpentine within shrubby vegetation in chaparral habitat at elevations ranging from 260 to 3,270 feet. This species has a serpentine affinity rank of strict endemic (5.7); however, this species has been documented from volcanic substrates as well. Three populations of Greene's narrow-leaved fleabane (63 individual plants) were observed within chamise chaparral between the two areas of existing structural development in the project site, occupying less than 0.1 acre. None of these populations are within the proposed development area.

Sharsmith's western flax: Sharsmith's western flax is an annual herb in the flax (Linaceae) family that blooms from May through July. It typically occurs on serpentine open chaparral habitat ranging in elevations from 884 to 1,000 feet. Several populations of Sharsmith's western flax were observed throughout much of the project site save for its western portion, within the chaparral land cover type. Approximately 37,700 individuals total were observed occupying approximately 8.9 acres, with 2.5 acres located in the proposed development area.

Napa biscuitroot: Napa biscuitroot is a perennial forb in the carrot family (Apiaceae) that blooms from March through June. It typically occurs on serpentine substrate in chaparral and cismontane woodland habitat at elevations ranging from 290 to 2,700 feet. This species has a serpentine affinity rank of strong indicator (3.2). Associated species include a variety of native chaparral shrubs and herbaceous species. Several populations of Napa biscuitroot (15 individual plants) were observed within chamise chaparral in the central portion of the project site, occupying 0.02 acres), with one individual in the proposed development area.

Green monardella: Green monardella is a perennial rhizomatous herb in the mint (Lamiaceae) family that blooms June through September. It typically occurs on volcanic and serpentine soils in broadleaf upland forests, chaparral, or cismontane woodland habitat in elevations ranging from 300 to 3,000 feet. Known associated species include various species of ceanothus (*Ceanothus* spp.) and manzanita (*Arctostaphylos* spp). Green monardella was observed throughout much of the project site within the open chaparral land cover type; the on-site distribution of this species was closely associated with that of holly-leaved ceanothus. Given the very large number of individual plants estimated to have been present during surveys (a minimum of tens of thousands), this species was not mapped, and its distribution presumed. The project site is situated in the center of the broader distribution in Napa County of this species (i.e., it is not a fringe or edge population).

Protecting the continued presence of special-status species, including special-status plants, special-status wildlife, and their habitats, is encouraged by Napa County General Plan Goal CON-3.¹⁴ Additionally, pursuant to Napa County General Plan Policy CON-13,¹⁵ the

¹⁴ 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.

¹⁵ 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

County shall require that all discretionary agricultural projects consider and address impacts to wildlife habitat and avoid impacts to habitat supporting special-status species to the extent feasible, and where impacts to special-status species and their habitat cannot be avoided, projects shall include effective mitigation measures and management plans to provide protection for habitat supporting special-status species through buffering or other means, and enhance existing habitat values particularly for special-status species through restoration and replanting as part of the project or its mitigation.

Table 7 – Summary of Special-Status Plant Species in the Project Site and Proposed Development Area

Special-Status Plant Species	Total Acres on the Project Site	Impacted Acres in Proposed Development Area	Retained Acres	Individuals Removed	Retention Percentage
Narrow-anthered brodiaea	0.46	0.09	0.37	38	80.8%
Holly-leaved ceanothus	82.69	16.18	66.51	1,840	80.4%
Green's narrow-leaved fleabane	0.04	0	0.04	0	100%
Sharsmith's western flax	8.94	2.48	6.46	15,243	72.2%
Napa biscuitroot	0.02	<0.01	>0.01	2	93.8%
Green monardella	82.69	16.18	66.51	1,840	80.4%

Source: Wildlife Research Associates, March and June 2025 – Exhibits B-1 and B-2.

The project as proposed would remove up to approximately 15.4% of the special-status plants and/or populations occurring within the project site as shown in **Table 7** above. It should be noted that the areas containing and mapped with special-status plant species overlap each other in all cases, in particular Holly-leaved ceanothus and Green monardella with the other identified species being located within the larger area containing Holly-leaved ceanothus and Green monardella. These areas containing special-status plant species are also considered special-status species habitat. Therefore, there is approximately 82.69-acres of special-status plant species habitat in the property of which the project would affect 16.18-acres.

The removal of these special-status plant species would be inconsistent with the following Napa County General Plan Conservation Element Goals and Policies and Zoning Ordinance: General Plan Goal CON-3 as it does not protect for the continued presence of special-status plant species; Policy CON-13 in that impacts to special-status plant species cannot be avoided while allowing for up to approximately 14 net acres of agriculture on the project site (as further disclosed and assessed below); and, the purpose and intent of the Conservation Regulations (NCC Chapter 18.108) in that it adversely affects sensitive, rare, threatened or endangered plants. This would be a significant impact.

To reduce potential impacts to special-status plant species to a less-than-significant level, **Mitigation Measure BIO-1** would be implemented to preserve special-status plant species habitat at a 2:1 ratio consistent with Policy CON13 and CON-17.c, and the Conservation Regulations Section 18.108.100. With the implementation of **Mitigation Measure BIO-1**, 32.4-acres of remaining special-status plant habitat would be preserved. Maintaining connectivity with other onsite special-status plant individuals, and with on-site and off-site preservation areas (Instrument #2024-0007763, recorded June 3, 2024) would provide for continued cross-pollination and gene flow between these on-site special-status plant populations/individuals and habitat. Retention of the special-status plants and connected habitat within the project site and area are expected to maintain viable populations both on the property and more broadly in the region and reduce potential cumulative impacts to a less-than-significant level (also see the discussion under question d below). **Mitigation Measure BIO-1** also requires the flagging of plant populations adjacent to the proposed clearing limits to prevent inadvertent impacts.

Implementation of **Mitigation Measure BIO-1** would reduce impacts to special-status plant species to a less-than-significant level in that it would: i) avoid more than 85% of the project site's special-status plant populations/individuals and permanently preserve 34.2-acres (or 49%) of the site's special-status plant habitat, ii) result in consistency with General Plan Goal CON-3, Policies CON-13, and Conservation Regulations (NCC Chapter 18.108), because it would preserve the special-status plants, and iii) result in consistency with Goal CON-2¹¹ because it would assist in maintaining the existing level of biodiversity in the County, as well as contribute to minimization of potential cumulative impacts associated with the loss of special-status plant species due to agricultural conversion projects.

Furthermore, implementation of **Mitigation Measure BIO-1** would not substantially affect the feasibility of the project or the continued viability of agricultural use of the project site, in that it would allow the owner/permittee to develop and operate approximately 16.7 gross acres of vineyard on the project site.

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.

¹¹ Goal CON-2: Maintain and enhance the existing level of biodiversity.

To reduce potentially direct and indirect significant impacts to special-status plant species present in the proposed development area to a less-than-significant level, **Mitigation Measure BIO-1** would be implemented to permanently preserve special-status plant species and associated habitat within the project site consistent with Policy CON-17.

Mitigation Measure BIO-1: The owner or permittee shall implement the following measures to minimize potential impacts to special-status plant species (i.e., narrow-anthered brodiaea, holly-leaved ceanothus, Sharsmith's western flax, Napa biscuitroot, and green monardella) and its habitat:

- a. The owner or permittee shall revise #P25-00080-ECPA prior to approval to identify a Preservation Area, totaling a minimum of 32.4-acres of the site's special-status plant species habitat. The area shall be designated for preservation in a deed restriction, mitigation easement with an organization such as the Land Trust of Napa County as the grantee, or other means of permanent protection acceptable to Napa County. Land placed in protection shall be restricted from development and other uses that would degrade the quality of the preserved habitats (e.g., 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 preservation areas shall be determined by the County or a qualified botanist/biologist: determinations by a qualified botanist/biologist shall be submitted to Napa County for review and approval prior to their incorporation into the ECPA. The owner or permittee shall record the deed restriction or mitigation easement within 90 days of the County's approval of #P25-00080-ECPA. In no case shall the erosion control plan be initiated until said deed restriction or mitigation easement is recorded.
- b. In accordance with Napa County Code Section 18.108.100 (Erosion hazard areas – Vegetation preservation and replacement) any special-status plants/populations inadvertently removed as part of development authorized under #P25-00080-ECPA shall be replaced on-site at a ratio of 2:1 at locations with similar habitat. For such removal a replacement plan shall be prepared by a qualified botanist or ecologist for review and approval by the Director prior to vineyard planting. At a minimum, the replacement plan shall include i) a site plan showing the locations where replacement plants will be planted, ii) a plant pallet composed the special-status plants specie(s) being removed including sizes and/or application rates, iii) planting notes and details including any recommended plant protection measures, iv) invasive species removal and management specifications, v) an implementation and monitoring schedule, and vi) performance standards with a minimum success rate of 80% to ensure the success of re-vegetation efforts. Any replaced special-status plants shall be monitored for a period of at least three years to success criteria are met.

Special-Status Animals: Based upon a review of the biological resource databases listed in **Exhibit B-1**, 60 special-status animal species have the potential to occur in the vicinity of the project site¹⁶; however, none of these species have the potential to occur in the project site. The biological surveys did not identify habitat for special-status animal species within the proposed development area and no special-status animal species were observed during the surveys (Wildlife Research Associates, March 2025 – **Exhibit B-1**).

Migratory birds and raptors protected by the Migratory Bird Treaty Act and California Fish and Wildlife Code may 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 potentially significant impacts on protected bird species to a less-than-significant level, **Mitigation Measure BIO-2** would be implemented.

Mitigation Measure BIO-2: The owner/permittee shall revise Erosion Control Plan #P25-00080-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 the California Department of Fish and Wildlife (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.

¹⁶ The Biological Resource Reconnaissance Survey identifies 60 special-status wildlife species with the potential to occur at the proposed project site (see Exhibit B-1, Appendix C); however, this total was stated as 58 species in the Report. The Report also identifies white-tailed kite (*Elanus leucurus*) as having potential to occur; however, this species is identified as having an unlikely potential to occur in Appendix C of the Report. Therefore, these totals have been updated to reflect adjustments to these findings.

- 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 (i.e., removing or disturbing nests by physically disturbing trees with construction equipment), audible (i.e., utilizing sirens or bird cannons), or chemical (i.e., spraying nesting birds or their habitats) would be considered an impact on nesting birds and is prohibited. Any act associated with flushing birds from project areas should undergo consultation with the USFWS/CDFW prior to any activity that could disturb nesting birds.
- b-c. One unnamed blue-line stream is located on the northern portion of the project site and flows to Lake Hennessey. A second blue line stream is located in the southern portion of the project site and flows to the Napa River. An unnamed blue-line stream located just to the east of the project site flows to Rector Reservoir. At the closest point, the development area is setback approximately 600 feet from the closest blue-line stream. There are also several ephemeral streams in the western and southern portions of the project site (**Exhibit A-1**). Minimum 35-foot stream setbacks have been maintained from the ephemeral drainages in accordance with NCC 18.108.025; further, there is no riparian habitat, other sensitive natural community features, or wetlands present on the project site (**Exhibit A-1**). The proposed project has also been designed to reduce existing soil loss (sedimentation) and hydrologic/runoff characteristics (i.e., result in no net increase in soils loss or runoff as compared to existing conditions); therefore, the proposed project would not result in significant impacts to drainages, wetlands or ponds. The proposed project would not result in a significant impact to riparian habitat, wetlands or other sensitive natural community. Impacts would be less than significant.
- d. Wildlife corridors are natural areas interspersed with developed areas that are important for animal movement, increasing genetic variation in plant and animal populations, the reduction of population fluctuations, and the retention of predators of agricultural pests and for movement of wildlife and plant populations. Wildlife corridors have been demonstrated to not only increase the range of vertebrates including avifauna between patches of habitat but also facilitate two key plant-animal interactions: pollination and seed dispersal. Corridors also preserve watershed connectivity. Corridor users can be grouped into two types: passage species and corridor dwellers. The data from various studies indicate that corridors should be at least 100 feet wide to provide adequate movement for passage species and corridor dwellers in the landscape.

Construction activities could result in temporary barriers to wildlife movement, but these are not expected to be significant because they are temporary and because of the limited scale of the project. The project site is located within a mapped "Essential Connectivity Area," specifically a large, north-south oriented tract of land east of Napa Valley. The project site is located at the western edge of this mapped area, which is approximately 8.8 miles wide in that vicinity. At the scale of landscape linkages, this tract provides connectivity between Baylands of San Pablo Bay and areas from northern Napa County. Given the small size of the project site (relative to the width of the corridor tract) and the lack of apparent development impacts within the more central portion of this tract, agricultural expansion within a portion of the project site is unlikely to result in any significant impacts to wildlife movement or migration at the landscape-linkage scale. At a localized scale the project site provides connectivity between undeveloped areas on neighboring properties, primarily via chaparral and grassland land covers (the latter on sites to the west). Connectivity in the north-south direction is largely precluded via existing vineyards and other development elements to the north, south, and southwest. While the proposed project (installation of on-site vineyard blocks) would result in portions of the site having reduced potential for on-site wildlife movement, such movement would still be feasible in the east-west direction through the southern portion of the site via chaparral land covers. This would allow for continued wildlife movement. Given the relatively small size of the proposed development area (relative to the area of the greater corridor tract), the apparent lack of development impacts within the eastern portions of this tract, and the retention of the chamise and oak scrub chaparral habitat on much of the project site, the proposed project is not anticipated to result in any potentially significant impacts to wildlife movement or migration (Wildlife Research Associates, March 2025 – **Exhibit B-1**).

Though the proposed project would incrementally reduce a small amount of habitat in the project area, resulting in changes in avifauna and rodent utilization in the area, the proposed project would not lead to significant impacts to habitat fragmentation in the region, significant species exclusion, or a significant change in species composition in the region.

The proposed project would be consistent with General Plan Policy CON-18, which encourages the reduction of impacts to habitat conservation and connectivity. Wildlife nursery sites were not identified in the project site, and there would thus be no impact on wildlife nursery sites. Impacts to wildlife movement, habitat use and availability, and vegetation removal would be less than significant.

The proposed project would include the placement of new wildlife exclusion fencing around proposed vineyard Blocks B and C which would connect to existing wildlife exclusion fencing on-site (**Exhibit A-1**). However, proposed wildlife exclusion fencing maintains the

designated stream setback areas, would only be installed around the individual proposed vineyard blocks, and would not result in significant impacts to wildlife movement and use. In order to ensure that wildlife exclusion fencing is installed in a manner that is consistent with the biologist and CDFW recommendations to minimize impacts to wildlife movement, the following conditions shall be implemented, should the project be approved.

Fencing – Conditions of Approval:

The owner/permittee shall revise Erosion Control Plan #P25-00080-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 #P25-00080-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.
 - c. Any modifications to the location of deer fencing as specified in Erosion Control Plan #P25-00080-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 deer fencing location/plan would not result in potential impacts to wildlife movement.
- e. The project site does not contain oak woodland, riparian oak woodland, or coniferous forest and no trees are proposed for removal.

Because the project site is located in the Lake Hennessey and Rector Reservoir Sensitive Domestic Water Supply Drainages, pursuant to NCC Section 18.108.027(B) (Sensitive domestic water supply drainages – Vegetation Clearing) a minimum of 70% of the tree canopy and a minimum of 40% of the grass/brush cover existing on the parcel in 1993 is required to be retained as part of the project. Based on information provided in the Vegetation Retention Analysis prepared by Applied Civil Engineering (March 2025; **Exhibit B-3**), approximately 13.2 acres of APN 032-030-003 is located in the Lake Hennessey Drainage and approximately 36.7 acres and 33.3 acres of APN 032-030-004 are located in the Lake Hennessey and Rector Reservoir Drainages, respectively¹⁷.

In 1993, the areas of APN 032-030-003 within the Lake Hennessey Drainage contained 12.8 acres of grass/brush cover. Development since 1993 has removed approximately 6.3 acres of grass/brush cover. With the proposed project, no additional brush/shrub cover subject to Section 18.108.027(B) would be removed in the Lake Hennessey Drainage, which would result in the overall retention of approximately 51% of the brush/shrub cover in 1993 in the Lake Hennessey Drainage within APN 032-030-003.

In 1993, the areas of APN 032-030-004 within the Lake Hennessey Drainage contained 35.6 acres of grass/brush cover. Development since 1993 has removed approximately 15.1 acres of grass/brush cover. With the proposed project, no additional brush/shrub cover subject to Section 18.108.027(B) would be removed in the Lake Hennessey Drainage, which would result in the overall retention of approximately 58% of the brush/shrub cover in 1993 in the Lake Hennessey Drainage within APN 032-030-004.

In 1993, the areas of APN 032-030-004 within the Rector Reservoir Drainage contained 32.6 acres of grass/brush cover. Development since 1993 has removed approximately 9.9 acres of grass/brush cover. With the proposed project, an additional 0.3 acre of brush/shrub cover subject to Section 18.108.027(B) would be removed in the Rector Reservoir Drainage, which would result in the overall retention of approximately 69% of the brush/shrub cover in 1993 in the Rector Reservoir Drainage.

The subject parcels contained no tree canopy cover in 1993. With the proposed project, no tree canopy cover subject to Section 18.108.027(B) would be removed. Therefore, the proposed project is consistent with Section 18.108.027(B).

NCC Section 18.108.020(C) (General Provisions: Vegetation Retention Requirements) requires that parcels within the Agricultural Watershed zoning district retain 70% of the vegetation canopy cover¹⁸ based on the on-site canopy present on June 16, 2016. As mentioned above, the project site does not contain oak woodland, riparian oak woodland, or coniferous forest; therefore, NCC Section 18.108.020(C) do not apply to the proposed project.

Specific to vegetation removal mitigation and preservation, NCC Section 18.108.020(D) (Vegetation Removal Mitigation) 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 Section 18.108.020(E) (Preserved Vegetation Canopy Cover) requires preserved vegetation canopy cover to be protected (or otherwise enforceable restricted) through a perpetual protective easement or deed restriction preserving and conserving the preserved vegetation canopy cover.

¹⁷ In 1993 the project parcel (APN 032-030-070) and adjacent APNs 032-030-066 and -071 were part of two larger parcels, APNs 032-030-003 and -004, which have since been subdivided. The vegetation retention analysis for the proposed project presents retention estimates which reflect parcel boundaries as they were in 1993 rather than only considering current parcel boundaries.

¹⁸ NCC 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)."

Given that the project site does not contain oak woodland, riparian oak woodland, or coniferous forest would not result in the removal of vegetation canopy cover, NCC Section 18.108.020(D) and NCC Section 18.108.020(E) do not apply to the proposed project.

With the implementation of **Mitigation Measures BIO-1** and **BIO-2** and the conditions of approval above, the proposed project would have less-than-significant impacts on special-status plants and wildlife as well as wildlife movement and result in conformance with policies protecting biological resources in the Napa County General Plan and Conservation Regulations. Further, as discussed in **Section VII (Geology and Soils)** and **Section X (Hydrology and Water Quality)**, under existing conditions, the annual soil loss is anticipated to average 27.24 tons per year across the proposed development area depending on soil type, slope length, and gradient. Under proposed project conditions, soil loss is anticipated to total 17.77 tons per acre per year, or a reduction of approximately 35% as compared to existing conditions. Therefore, the findings can be made that highest biological and water quality protections have been incorporated into the project, as proposed, with incorporation of **Mitigation Measures BIO-1** and **BIO-2**, consistent with applicable Napa County General Plan Policies and NCC Chapter 18.108, resulting in less-than-significant impacts.

- 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 (Assembly Bill 52 - Gatto).

Archaeological Research Service conducted an cultural resource inventory report within the project site, 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 deposits¹⁹.

a-b. The cultural resource inventory report (Archaeological Research Service, 2024) identified two isolated obsidian specimens near the proposed development area indicating that there is a possibility that obsidian tools, flakes or other historic features may be encountered when the dense brush cover is removed for the proposed development. There is also 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 resource inventory report 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:

¹⁹ At the time of the survey, Block B was almost entirely covered by dense chapparal, which prevented the crew from walking across this area and effectively carrying out a detailed inspection. However, it was determined that the lack of level terrain would have discouraged Native American settlement, making it highly unlikely that any artifactual material is even present in this area. Furthermore, prior unrelated surveys which included the project site (William Self, 2001) suggest that there are no unrecorded resources within its boundaries.

- 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 two phases with construction occurring for up to six months during each 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 (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

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

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 type="checkbox"/>	<input checked="" 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"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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 on an active fault or within an “Earthquake Fault Hazard Rupture Zone” designated by the Alquist-Priolo Earthquake Zoning Act. The nearest faults are located approximately 8.1 miles west and 10.1 miles south of the project site (Napa County GIS faults and earthquakes layer). 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 located in an area that may be subject to moderate 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 Napa County General Plan identifies the project site as having very low liquefaction potential (Napa County General Plan-Safety Element, 2023). 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 landslide deposits mapped on the project site and in the immediate vicinity (Napa County GIS, Faults Layer). A landslide hazard evaluation was prepared by RGH Consultants (April 2020; **Exhibit C**) to evaluate potential geologic risks as a result of the proposed project. The evaluation identified no large-scale slope instabilities, and it was determined it was geologically feasible to construct the proposed project at the project site. The evaluation stated that keying the proposed rock benches and out sloped vineyard avenues into firm competent bedrock at least 24 inches below grade as indicated in the ECP was appropriate from a geologic and geotechnical perspective and no additional recommendations were made. Therefore, given the agricultural nature of the proposed project and the proposed erosion 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 (see Question c below for additional discussion regarding slope stability and landslides).
- b. Soils in the proposed development area have been classified according to the Soil Survey of Napa County (USDA 1978) as Boomer gravelly loam, volcanic bedrock, 14 to 60% slopes and Rock outcrop-Hambright complex, 50 to 75% slopes. 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 1 and April 1; however, in municipal watersheds like the ones that the project site is located in, earth-disturbing activities (other than installation of winterization measures) cannot be performed between September 1 and April 1 pursuant to NCC Section 18.108.027(C). These activities would take place during the dry season when rainstorms are less likely, resulting in negligible erosion and sedimentation during project installation.

Soil loss calculations were prepared using the Universal Soil Loss Equation (USLE) to evaluate potential effects of erosion as a result 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 agricultural development and operations would primarily be controlled through cover crops with a minimum vegetative cover density of 75% for proposed vineyard Block A and 80% for proposed vineyard Blocks B and C. The cover crop provides the ability to trap eroded soils onsite, thereby reducing soil loss and sedimentation potential.

Based on USLE modeling calculations prepared by David Steiner, Certified Professional Spoil Erosion and Sediment Control Specialist No. 770 (March 2025; **Exhibit D**), the proposed conversion of approximately 16.7 gross acres of vegetation to vineyard is anticipated to reduce soil loss, or surface erosion, within the project site as compared to existing conditions (**Table 8**). Under existing conditions, the annual soil loss is anticipated to total 27.24 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 17.77 tons per year, or a reduction of approximately 35% as compared to existing conditions.

Table 8 – USLE Soil Loss Analysis

Proposed Vineyard Block Transect	Pre-project Soil Loss (tons/year)	Post-project Soil Loss (tons/year)	Difference	Percent Change (approximate)
A-1	9.93	6.79	-3.14	-32%
A-2	6.53	6.09	-0.44	-7%
B	8.52	3.76	-4.76	-56%
C	2.26	1.13	-1.13	-50%
Total¹	27.24	17.77	-9.47	-35%

1. Totals may differ slightly due to rounding.

Source: David Steiner, Certified Professional Spoil Erosion and Sediment Control Specialist No. 770, March 14, 2025, Soil Loss Analysis – Exhibit D

Other proposed erosion control features that are anticipated to further reduce potential soil loss as a result of the proposed project, including soil loss experienced during vineyard and cover crop development and establishment, consist of straw wattles, silt fences, straw mulching, energy dissipaters, rock filled avenues, erosion control blankets, water bars, 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 #P25-00080-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 runoff and sediment attenuation devices and hydromodification facilities including but not limited to permanent no-till cover crop (or adequate mulch cover applied annually), shall be installed no later than September 15 during the same year that initial vineyard development occurs. This requirement shall be clearly stated in 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 (#P25-00080-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 plant residue density of a permanent cover crop to achieve a minimum vegetative cover density of 75% for proposed vineyard Block A and 80% for proposed vineyard Blocks B and C. The cover crop may be strip sprayed, with a strip no wider than 1.5 feet (18 inches) wide at the base of vines, with post-emergent herbicides: no pre-emergent sprays shall be used. 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 (i.e., 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 liquefaction and the proposed project does not include any mapped landslide deposits. The proposed development area is in an area with low chances of ground failure, 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 low to moderate shrink-swell potential (USDA, 1978). However, 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 with regard to 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 on 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. In the event that 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 on the basis 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 Air District 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 Air District, 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 March 2012, a Draft CAP 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.

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>,

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

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. The County is currently preparing an updated 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 the Air District 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). Unlike air quality impacts which are regional in nature, 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 the Air District or a qualified CAP for the County. In addition to the use of SMAQMD's 1,100 MTCO_{2e} threshold for the evaluation of construction and operational emissions, the County, as the Lead Agency, has opted to use a no net increase threshold for the evaluation of CO₂ emissions associated with carbon sequestration and carbon stock from vegetation at the project site.

"Carbon stock" or 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.

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"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.

Emissions from change in vegetation associated with the proposed project 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); iii) ongoing carbon sequestration that is gained or lost by altering vegetation or conserving specific vegetation types (referred to as Carbon Sequestration Emissions).

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 the project include emissions from fuel used in construction equipment and vehicle trips used to prepare the development area and plant the vineyard. As discussed in **Section III (Air Quality)**, three County Certified CEQA documents were assessed and analyzed for 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 156-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 16.7 gross acres of vineyard development would be approximately 321.3 MT CO_{2e} (16.7-acres multiplied 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 46.3 MT CO_{2e} per year (16.7 multiplied 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 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 18.4-acres of existing vegetation to vineyard are disclosed below, which includes carbon stored in aboveground vegetation and belowground in soil.

Based on V-CESS Calculator inputs that include the removal of 9.2 acres of chamise chaparral, 6 acres of mixed chaparral, and 1.5 acres of urban vegetation, in addition to vehicular emissions and loss of sequestration due to vegetation removal, the project could result in a potentially significant GHG impact. The outputs of project show that there could be a one-time project emissions totaling 1,357.9 MT CO_{2e} which exceeds the SMAQMD's construction threshold of 1,100 MT CO_{2e}. These project output values/emissions consist of the following in MT CO_{2e}: equipment emissions 321.3, carbon stock emission due to removal of existing vegetation 1,020.1, loss carbon sequestration annually due to vegetation removal 16.5.

Based on V-CESS Calculator inputs that include **Mitigation Measure BIO-1** resulting in the preservation of at least 32.4-acres of the project site's chaparral habitats, the mitigated project would result in a less than significant GHG impact. The outputs of the mitigated project show that there could be a one-time project emission totaling -2,496.7 MT CO_{2e} which is below the SMAQMD's construction threshold of 1,100 MT CO_{2e}. These project output values/emissions consist of the following in MT CO_{2e}: equipment emissions 321.3, carbon stock emission due to removal of existing vegetation 1,020.1, carbon sequestration annually due to vegetation removal 16.5,

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.

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.

carbon stock sequestration due to preservation and mitigation -3,767.1 and annual carbon sequestration due to preservation and mitigation -60.5.

Specific to carbon sequestration under existing conditions, the project area currently sequesters up to 16.5 MT CO_{2e} annually. With incorporation of **Mitigation Measure BIO-1** it is anticipated that annual sequestration would increase to 60.5 MT CO_{2e} a year. The additional carbon stock and annual sequestration associated with this preserved land associated with **Mitigation Measure BIO-1**, which would require the project to preserve a minimum of 32.4-acres of chaparral habitat, would reduce the project's construction GHG emissions to below the SMAQMD construction GHG emission threshold.

Therefore, with implementation of **Mitigation Measure BIO-1** the project 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.

Additionally, while the BAAQMD's qualitative operational thresholds do not apply to the proposed project which does 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"/>
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 herbicides, mildewcides, and fertilizers to the site that are considered hazardous materials. Herbicide applicators must be licensed by the state, and 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.

Onsite storage of hazardous materials, chemical mixing, and cleaning and washing of chemical application equipment would not occur on the project site, chemicals would be brought to the site as needed by the vineyard manager and equipment would be washed offsite.

Fertilizers (i.e., nitrogen, magnesium, boron, and zinc) would be applied via drip or foliar between one to three times every year. Mildewcides (i.e., Sonata and wettable sulfur) would be sprayed onto the vines up to six times per year. Herbicides (i.e., Lifeline and EQ) would be sprayed twice every year.

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).

One unnamed blue-line stream is in the northern portion of the project site and flows to Lake Hennessey. A second blue-line stream is located in the southern portion of the project site and flows to the Napa River. An unnamed blue-line stream is located just to the east of the project site flows to Rector Reservoir. At the closest point, the proposed development area is setback approximately 600 feet from the closest blue-line stream. There are also several ephemeral streams in the western and southern portions of the project site, the closest of which is approximately 70-feet from the development area in excess of the setback in accordance with NCC 18.108.025. The other ephemeral drainages are 125 feet or more from the development area. No wetlands or other sensitive aquatic features are present onsite and therefore the proposed project would be in accordance with NCC 18.108.025 (**Exhibit A-1**). Therefore, no waterways have the potential to be significantly impacted by the proposed project.

The risk of potentially hazardous materials reaching or affecting adjacent water courses or other aquatic resources is significantly reduced because: i) there are no streams or wetlands located within 50 feet of the proposed development area; and ii) 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. Impacts related to routine use, transportation, and application of hazardous materials described above are anticipated to be less than significant. The following conditions of approval would be implemented to reduce potential accidental release of hazardous materials, if the project is approved:

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 manufacturers' 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 to the project site are located in the City of St. Helena located over 6 miles to the northwest (Napa County GIS, Schools Layer). There are no schools within 0.25 mile 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; GeoTracker, 2026). 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, 2024, and Napa County GIS Airport Layer). The closest airfield, Angwin-Parrett Field, is located over 9 miles to the northwest. Therefore, no impact would occur.
- f. During construction, there would be negligible numbers of workers (up to 16 employees) visiting the project site on a temporary basis to implement the project and install vineyards. Up to 16 employees would also visit the site on a seasonal basis for subsequent vineyard operations (**Exhibit A-3**). 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 site is located in a State Responsibility Area (SRA) and has a High Fire Hazard Severity Zone designation (CalFire, Fire Hazard Severity Zone 2026; Napa County GIS CalFire Layers, Fire Protection Responsibility Areas and Fire Hazard Severity Zones). 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 in May and August, 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 checked="" type="checkbox"/>	<input 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 7 miles to the south southeast.

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."²⁴

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.

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"²⁵; 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 Board²⁶.

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

²⁴ 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.

²⁵ 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, 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.

²⁶ https://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/agriculture/vineyard/

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 located within the Vine Hill Creek and Rector Reservoir drainages, which flow into the Napa River. However, the proposed development area is predominately located Vine Hill Creek drainage, with approximately 0.5-acres located Rector Reservoir drainage. One unnamed blue-line stream is located in the northern portion of the project site and flows to Lake Hennessey. A second blue-line stream is located in the southern portion of the project site and flows to the Napa River. An unnamed blue-line stream is located just to the east of the project site flows to Rector Reservoir. At the closest point, the proposed development area is setback approximately 600 feet from the closest blue-line stream. There are also several ephemeral streams on the project site (**Exhibit A-1**). Stream setbacks in excess of 70 feet to 125 feet or more have been maintained from the ephemeral drainages in accordance with NCC 18.108.025.

- 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 #P25-00080-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 and heat protected using groundwater supplied by an existing well located in the eastern portion of the project site, referred to as the Project Well. No water for frost protection is proposed. No surface water would be used on the vineyard. All existing onsite water demands, 12.5 AF/yr for the 6.2 acres of existing vineyard, residential uses including the main residence and two guest houses, and landscaping, are currently met by groundwater pumped from the Project Well. A second groundwater well, referred to as the Ovide Easement Well 12, is also located onsite and supplies 7.77 AF/yr of water to existing vineyards at the nearby Ovid Winery located to the north; however, this well would not be used for the proposed project and is located over 500 feet to the west of the Project Well.

A Tier 1 WAA was prepared to determine if the proposed increase in groundwater demand as a result of the proposed project would result in a significant impact to groundwater supplies (Richard C. Slade and Associates, May 2025 – **Exhibit E**). 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 Project Well is not located within 500 feet of another well, nor is the Project Well located within 1,500 feet of a significant stream per Napa County GIS information; therefore, no Tier 2 or Tier 3 WAA is needed.

Tier 1 Water Availability Analysis: Water demand for the proposed 14 net acres of new vineyard would be approximately 7 AF/yr for irrigation and 3.5 AF/yr for heat protection for a total water demand of approximately 10.5 AF/yr. Combined with existing water demand from the Project Well and Ovid Easement Well 12, post-project water demand would be approximately 30.77 AF/yr.

Long-term average groundwater recharge can be estimated as the percentage of rainfall that falls on the project aquifer recharge area and 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, soil type and geology that exists at 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 WAA, which uses an average annual rainfall of 28.32 inches per year over an approximately 147.59-acre aquifer recharge area²⁷ and a 17% infiltration rate, estimates the average annual groundwater recharge to be approximately 59.21 AF/yr (see **Exhibit E** for details and calculations). The average annual rainfall used 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 in the project well recharge area of 30.77 AF/yr is below the estimated average annual recharge volume of 59.21 AF/yr identified in the WAA.

Considering: i) anticipated annual water use of the proposed project and Project Well groundwater recharge area of approximately 30.77 AF/yr is below the anticipated annual groundwater recharge rate screening criteria (or allocation) of approximately 59.21 AF/yr; ii) there is no evidence to date indicating that there are groundwater problems or declining well production in this area of the County; and iii) incorporation of the standard groundwater management conditions of approval below to reduce potential impacts associated with

²⁷ The project site is 152.6 acres; however, approximately 3.3% of the project site include slopes over 30% (approximately 5.04 acres); therefore, the ability of these areas to adequately recharge is significantly reduced. For these reasons the WAA considers the aquifer recharge area to be 147.59 acres.

groundwater use, the proposed project (if approved) would result in less-than-significant impacts to groundwater supplies, groundwater recharge, and local groundwater aquifer levels.

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.

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 establishment of a no-till cover crop with vegetative cover density minimum of 75% for proposed vineyard Block A and 80% for proposed vineyard Blocks B and C, 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. Refer to **Exhibit F** for details related to the following discussion.

Proposed erosion control and project features that have the potential to alter natural drainage patterns include installation of temporary erosion control measures such as fiber rolls/wattle sediment barriers, silt fences, straw mulching, erosion control blankets, water bars, and other practices as needed. Permanent erosion control measures include energy dissipaters, rock filled avenues, and a permanent cover crop. These proposed erosion control measures are not anticipated to significantly alter the existing topography or drainage patterns of the project site, or direct surface flows into other watersheds (as further described below). As discussed in **Section VII (Geology and Soils)**, erosion control features would maintain soil losses below the tolerable levels for the soil types found on the project site and ensure (in conjunction with the cover crop) that no net increase in erosion sediment conditions occurs as a result of the proposed project, and that the proposed project is anticipated to decrease soil loss as compared to existing conditions.

A Hydrology Report for the proposed project was prepared by Applied Civil Engineering (May 2025; **Exhibit F**). The Hydrology Report used the USDA Technical Release 55 (TR-55) model which looks at changes in land use and hydrologic conditions through the use of weighted Curve Numbers (CN) to compare pre- and post-project changes in peak flow and runoff as a result of vineyard development, where an increase in CN value results in greater potential for runoff. The proposed development area is located on a ridgetop at or near a watershed break and therefore the Hydrology Report considered changes to four sub-areas based on land use and watershed, including three sub-areas in the Vine Hill Creek Watershed and one sub-area in the Rector Reservoir Watershed. The Hydrology Report determined that of the four sub-areas, three would result in a decrease to CN values while one would result in no net increase in CN value and therefore no net changes in runoff are anticipated. 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

- d. The project site is not located within a Federal Emergency Management Agency (FEMA) 100-year flood zone in a dam or levee failure inundation area, or in an area subject to seiche or tsunami (Napa County GIS FEMA flood zone and dam levee inundation areas layers; 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, herbicides, and mildewcides) 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 **Sections IV (Biological Resources) and 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 decrease times of 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 9.47 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 as a result 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 standard conditions identified in the **Hazards and Hazardous Materials Section (Section IX)**, 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"/>

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)**.

- 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?

Discussion

- a. The project site is located on Long Ranch Road, and the nearest established community is Yountville, approximately 3.8 miles southwest of the project site. Existing improvements on the project site include a residence, two guest houses, a garage, 6.2 acres of vineyards, paved, gravel and dirt roads, two groundwater wells, concrete water tanks, a septic system, and the related water and power utility infrastructure serving the existing uses. Surrounding areas contain agriculture (vineyard), a winery and rural residential areas. 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 designated under the Napa County General Plan as Agriculture, Watershed, and Open Space. Surrounding parcels are also zoned Agricultural Watershed and designated as Agriculture, Watershed, and Open Space in the Napa County General Plan Land Use Element. 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 as a result 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 by approximately 9.47 tons per year and maintain runoff conditions as compared to existing conditions.
- 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 and BIO-2** 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 native grasslands, sensitive biotic communities, and habitats of limited distribution and no net loss of sensitive biotic communities. A Biological Resources Reconnaissance Survey was prepared for the proposed project (**Exhibits B-1 and B-2**). The project as proposed would minimize potential direct, indirect, and cumulative impacts to special-status species and associated habitat occurring in the project site with implementation of **Mitigation Measures BIO-1 and BIO-2**. 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 and BIO-2**, 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, the proposed project would maintain levels of biodiversity and would avoid impacts on 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.
- The project site does not contain wetlands and therefore the proposed project is in accordance with NCC 18.108.025, 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 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 Agriculture, Watershed and Open Space (AWOS) and is therefore consistent with Policy AG/LU-20.

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 have 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
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"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a-b. The project site is not in an area with a known mineral resource 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 resources area in Napa County is the Napa Quarry, located over 14 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 used for agriculture (vineyard), winery and rural residential uses interspersed with undeveloped grasslands and woodlands. There is a residence and two guest houses located onsite immediately adjacent to the development area. The closest offsite residences to the project site are located approximately 0.5 mile (or +2,500 feet) to the northeast.

Activities associated with installation of the proposed project, including earthmoving, and subsequent vineyard operations, could generate noise levels above existing conditions. Several types of equipment would be necessary for implementation and operation of the proposed project, including bulldozers, tractors, excavators, backhoes, dump trucks, water trucks, and ATVs and passenger vehicles and/or light trucks. **Table 9** characterizes typical equipment noise levels at a reference distance of 50 feet. As identified in **Table 10**, equipment used for vineyard development could produce a maximum of 89 (A-weighted decibels) dBA at a distance of 50 feet.

Table 9 – 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 10 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 10 – 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

¹ Based 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 below 50 dBA at the nearest existing offsite residence and would be indistinguishable from the surrounding environment.

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). These noise levels should be reasonably representative of noise levels from wheeled and tracked farm equipment. 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 11** 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 11 – 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

¹ Based 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 would be below 50 dBA at the closest existing offsite residence and would be indistinguishable from the surrounding environment.

Napa County considers construction noise levels up to 75 dBA during daytime hours (7 a.m. to 7 p.m.) and 60 dBA during nighttime hours (7 p.m. to 7 a.m.) as compatible with residential uses (NCC Section 8.16.080), and ongoing (or established use) noise levels of approximately 55 dBA as compatible with residential uses (NCC Section 8.16.070). As the closest offsite residence would experience construction noise levels of below 50 dBA, noise and vibration impacts associated with project development are anticipated to be less than significant. Noise levels from routine operation and maintenance activities at the nearest offsite residence would be less than typical for compatible uses, 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. Additionally, the proposed project would not result in a permanent increase in ambient noise levels over what currently exists in the project vicinity, resulting in a less-than-significant impact on ambient noise levels of the area.

During site preparation and vineyard installation, the use of heavy equipment could result in a temporary increase in ambient noise levels in the vicinity of the project site as described above. Compliance with measures identified in the County's noise ordinance for construction-related noise, such as a limitation of hours of construction activity and muffling of equipment, would result in temporary less-than-significant noise and vibration impacts, and would result in no permanent increase in ambient noise levels in the vicinity of the proposed project in excess of County standards.

- c. 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 airfield, Angwin-Parrett Field, is located approximately 9.1 miles northwest. Therefore, no impact would occur.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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 (e.g., 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. The closest residences to the project site are located approximately 0.5 miles to the northeast. The proposed vineyard would not interfere with existing nearby residences. 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 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 **Sections XIV (Population and Housing) and 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 (SB) 743, the Governor's Office of Planning and Research (OPR) settled upon automobile vehicle miles of travel (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 (i.e., 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 residence, two guest houses, a garage, 6.2 acres of vineyard, paved, gravel and dirt roads, two groundwater wells, concrete water tanks, a septic system, and the related water and power utility infrastructure serving the existing uses. The project site is accessed from an existing private driveway off Long Ranch Road. Trucks and other equipment would use County roads or State highways for short periods during construction and subsequent vineyard operation.

The proposed project is expected to generate up to 12 vehicle trips per day during construction during land development, with up to 175 truck trips for equipment supply and delivery. Erosion control work is anticipated to generate 10 vehicle trips per day, with up to 32 delivery trips. Vineyard planting is anticipated to generate 10 vehicle trips per day, with up to 32 delivery trips. After vineyard installation, operational trips that include, but are not limited to, irrigation and trellis system inspection and repair, cover crop inspection and management, erosion control measure monitoring and maintenance, and vineyard inspection. During peak operations for activities such as vineyard pruning, weed and pest control, and harvest, the project is anticipated to generate between 10 vehicle trips per day, with up to 60 delivery trips annually (**Exhibit A-3**). Construction traffic would be intermittent during non-peak hours, generally arriving between 6 a.m. and 7 a.m. and departing between 2 p.m. and 3 p.m. Traffic associated with routine vineyard operation and maintenance would also be intermittent during the non-peak hours, generally arriving between 11 p.m. and 12 a.m. and departing between 6 a.m. and 7 a.m. The proposed project does include late pruning with traffic generally arriving between 6 a.m. and 7 a.m. and departing between 5 p.m. and 6 p.m.; however, late pruning would be infrequent, typically occurring once a year.

Because the proposed project would be expected to generate up to approximately 12 daily trips during the busiest time of construction (i.e., land development), with up to 175 truck trips for equipment supply and delivery during the two construction phases (or less than two truck trips per day) and 10 daily vehicle trips, with up to 60 delivery trips annually, for ongoing operations and maintenance, below the 110-daily 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. Further, operational trips are not anticipated to substantially increase because of the project due to the existing vineyard on the project site.

- c. The proposed project would use the existing private driveway off Long Ranch Road for project development. The proposed project does not include roadway improvements and/or modifications to the existing driveway or Long Ranch Road or 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 or 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 five vehicles) during harvest, which would occur over approximately five days. Current county ordinances do not require formal parking for agricultural projects. Parking within the proposed staging area and/or along 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 certified mail to the Mishewal Wappo Tribe of Alexander Valley, Middletown Rancheria, and the Yocha Dehe Wintun Nation on April 8, 2025.

On April 15, 2025, an email response from the Mishewal Wappo Tribe was received requesting consultation. On April 17, 2025, the County acknowledged receipt of the request for consultation. On April 23, 2025, the County sent a follow-up email to the Tribe that included the mitigatory/conditional provision that would be incorporated into the project should it be approved, and if any edits, inclusions, or comments on the proposed provision were necessary. No response to the County's April 23, 2025, email has been received.

On May 13, 2025, Yocha Dehe responded that the project site is not within the aboriginal territories of the Tribe, and therefore the invitation for consultation was declined; the County acknowledged the response in a letter dated May 28, 2025, and closed the consultation invitation.

No request for consultation was received from Middletown Rancheria and more than 30 days had elapsed since the County's consultation invitation was provided; therefore, the County sent a consultation closure letter to the Tribe dated May 28, 2025. However, on September 4, 2025, an email request to consult in response to the May 28, 2025, invitation closure was received from Middletown Rancheria, requesting the County to include mitigation measures for the project, should it be approved. On September 4, 2025, the County sent a follow up email to the Tribe acknowledging the Tribe's request to consult, included the mitigatory/conditional provision that would be incorporated into the project should it be approved and if any edits, inclusions, or comments on the proposed provision. No response was received to the County's September 4, 2025, email A follow up email was sent by the County on September 16, 2025; however, no response was received.

a-b. As discussed in **Section V (Cultural Resources)** the proposed project's cultural resource inventory report (Archaeological Research Service, 2024) identified two isolated obsidian specimens outside the proposed development area indicating that there is a possibility that obsidian tools, flakes or other historic features may be encountered when the dense brush cover is removed for the proposed development. There is also the possibility that buried archaeological deposits could be present and accidental discovery could occur. Through consultation with the Mishewal Wappo Tribe and the Middletown Rancheria, **Mitigation Measure TCR-1** will be implemented to ensure there are no significant impacts to Tribal cultural resources.

As such, the proposed project, with implementation of **Mitigation Measure TCR-1** and the Cultural Resources conditions of approval identified in **Section V (Cultural Resources)**, would result in less-than-significant impacts to tribal cultural resources, including those that

may be eligible for the California Historical Resources Information System or local register, or cultural resources as defined in Public Resources Code Section 5024.1(c).

Mitigation Measure TCR-1: Prior to the commencement of vegetation removal and earth disturbing activities pursuant to #P25-00080-ECPA the project the owner or permittee shall provide the following to ensure that impacts to Tribal Cultural Resources are minimized or avoided:

- a. The owner or permittee shall provide documentation to Napa County prior to project commencement demonstrating they have engaged with the Mishewal Wappo Tribe and the Middletown Rancheria 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 or the Middletown Rancheria, or both, the owner or permittee shall provide Napa County for review and approval prior to project commencement, a Cultural Monitoring Plan prepared by a professional archaeologist certified by the Registry of Professional Archeologists. The Cultural Monitoring Plan shall detail monitoring requirements including, but not limited to, monitoring schedule as necessary, sensitivity training for site workers, find procedures, and monitoring documentation 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 irrigation water would be supplied from an existing onsite well. Irrigation pipelines would be located in existing roads, vineyards and vineyard avenues, and/or within the proposed development area. The proposed development area would be partially located within the Rector Reservoir watershed; the Town of Yountville's primary water source is Rector Reservoir, the State of California Department of Veterans Affairs owns and operates the water treatment facility at Rector Reservoir, and the treated water is purchased by Yountville. Therefore, notice of the proposed project was sent certified mail to the Town of Yountville Public Works Department and the State of California Department of Veterans Affairs on April 8, 2025; however, no response has been received.

The proposed project would include the installation of a limited number of onsite storm water drainage features such as fiber rolls/wattle sediment barriers, silt fences, erosion control blankets, water bars, energy dissipaters, rock filled avenues, straw mulch applied at 3,000 pounds per acre, and a permanent 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), VII (Geology and Soils), IX (Hazards and Hazardous Materials), and X (Hydrology and Water Quality)** would result in a less-than-significant impact.

- b. Typically the annual irrigation season ranges from late May to September. The WAA prepared by Richard C. Slade and Associates (May, 2025; **Exhibit E**) concluded that after full development, total long-term groundwater demand for the project site with existing onsite and offsite uses (i.e. existing onsite residential, landscaping and vineyard) combined with the new 14 net acres of vineyard would be 30.77 AF/yr from two existing groundwater wells. Based on the 10-year average annual rainfall of 28.32 inches for the project area and estimated recharge, the annual recharge rate for the project site's recharge area was calculated to be 59.21 AF/year. The Project Well groundwater recharge area's estimated groundwater demand of 30.77 AF/yr with the proposed project represents approximately 52% of the average annual groundwater allotment. Napa County Board of Supervisors recently mandated enhanced regulations that propose groundwater use not exceed the recharge rate. Therefore, the proposed project would be consistent with this regulation and 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 used for downslope vineyard avenues or would be buried. Solid waste generated during construction activities (e.g., 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 (cane). 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 practices. 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 site is located in a State Responsibility Area (SRA) and has a High Fire Hazard Severity Zone designation (CalFire, Fire Hazard Severity Zones 2026; Napa County GIS CalFire Layers, Fire Protection Responsibility Areas and Fire Hazard Severity Zones). The general topography in the vicinity of the project site consists of the rolling mountains in all directions. Average slopes in the proposed development area range from 5% to 26%, with an average slope of 16%; approximately 0.8 acre is on slopes over 30%.

- 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. 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. The project site includes a portion of an existing fuel break which was installed by CalFire during the 2017 LNU Complex Fires; however, the proposed project would not include modifications to this fuel break

which could affect wildfire 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 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 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 #P25-00080-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 plant species and nesting birds has been identified in the project site. Implementation of **Mitigation Measures BIO-1** and **BIO-2** would avoid potential impacts to special-status and protected species.

The proposed project would include the placement of new wildlife exclusion fencing around proposed vineyard Blocks B and C which would connect to existing wildlife exclusion fencing on-site (**Exhibit A-1**). However, given the relatively small size of the project site (relative to existing wildlife corridors), agricultural expansion within the project site is in and of itself 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 project site includes a two existing preservation areas totaling 29.3 acres of land, and the proposed project would retain and preserve the vast majority of chamise and scrub oak chaparral habitat on-site through **Mitigation Measure BIO-1**, both of which would be contiguous with wildlife corridors, further increasing protection, use and availability of these areas by local wildlife. As such, the proposed project would not introduce any new significant movement barriers to wildlife and impacts to wildlife movement are expected to be less than significant. With implementation of **Mitigation Measure BIO-1** the range of special-status plant species would not be restricted, and cumulative impacts are anticipated to be less than significant. To reduce impacts on water quality within streams, the proposed project has been designed to avoid drainages with minimum 35-foot setbacks and there are no wetlands present on-site; therefore, the proposed project is in accordance with NCC 18.108.025.

With the incorporation of standard conditions of approval and the implementation of **Mitigation Measure TCR-1** to protect cultural and Tribal cultural resources that may be discovered accidentally, significant impacts on cultural and Tribal cultural resources are not expected (**Section V [Cultural Resources]** and **XVIII [Tribal Cultural Resources]**).

Therefore, the proposed project as designed with the incorporation of **Mitigation Measures BIO-1 and BIO-2, TCR-1**, and the 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 project site is located in the Vine Hill Creek and Rector Reservoir drainages (or watersheds). Because only approximately 0.5-acres, or less than 3% of the proposed development area is in Rector Reservoir Drainage the following disclosure and analysis will focus on the Vine Hill Creek Drainage.

The Vine Hill Creek Drainage area contains approximately 2,078.3 acres. In 1993, vineyard acreage within this drainage was approximately 766.9 acres, or 36.9% of the drainage. Since 1993, approximately 201.8 acres of additional vineyard (or 9.7% of the drainage) have been developed to vineyard, resulting in approximately 46.6% of the drainage (or approximately 968.7 acres) containing vineyard. It is estimated, based on evaluation of the County's GIS layer identifying Potentially Productive Soils within the Vine Hill Creek Drainage, that there are approximately 312.3 acres (15% of the drainage) having the potential to be developed to vineyard. This, in conjunction with existing and approved vineyard development (approximately 968.7 acres), results in a total potential build out of approximately 1,281 acres or approximately 61.6% 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 (i.e., Vine Hill Creek, Lake Hennessey, and Rector Reservoir Drainages) over the last 31 years (1993-2024) were used to project an estimation of vineyard development for the next three to five years.

Over the past 31 years within the Vine Hill Creek Drainage, approximately 31.2 acres of vineyard was developed per year (968.7 divided by 31). 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 93.6 to 156 acres over the next three to five years within the Vine Hill 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 watershed. It has been the County's experience with ECP projects that there are generally site-specific issues, such as oak woodland preservation, wetlands, other water features, special-status plant and animal species, or cultural resources that further reduce areas that can be developed to 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 below identified thresholds. Therefore, the proposed project is 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 air quality effects of the proposed project and ongoing operation. As detailed in **Section VIII (Greenhouse Gas Emissions)** the unmitigated project's construction emissions exceed the SMAQMD's GHG emission threshold of 1,100 MT CO_{2e}/year (**Section VIII, Greenhouse Gas**); however, with implementation of **Mitigation Measure BIO-1** the project's construction GHG emissions would be less than significant. The project's annual operational emissions are well below the SMAQMD operational GHG emission threshold of 1,100 MT CO_{2e}/year. 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 (i.e., scope and scale) with implementation of **Mitigation Measure BIO-1**.

Biological Resources – Section IV:

A project-specific biological resources reconnaissance survey (Wildlife Research Associates, March 2025 – **Exhibits B-1 and B-2**) were performed for the proposed project to evaluate potential habitat loss and disturbance to plant and wildlife species due to the proposed project. The surveys included database records searches to identify the presence or potential presence of special-status species within the

project site. As discussed in **Section IV (Biological Resources)**, six special-status plant species were identified on the project site, with only one of these species located outside of the proposed development area. No special-status animal species were identified in the proposed development area. There are no streams or wetlands within the proposed development area that would be affected by the proposed project; minimum 35-foot stream setbacks have been maintained from the ephemeral drainages and project site does not include other aquatic features; therefore, the proposed project is in accordance with NCC 18.108.025. With the incorporation of **Mitigation Measures BIO-1** and **BIO-2**, special-status plant habitat as well as nesting birds would be protected. Therefore, the proposed project would not contribute to a cumulatively significant impact to special-status plants and animals or habitats.

Cultural and Tribal Cultural Resources – Sections V and XVIII:

The cultural resources reconnaissance (Archaeological Research Service, 2024) identified two isolated obsidian specimens near the proposed development area. With the incorporation of standard conditions of approval and implementation of **Mitigation Measure TCR-1** to protect cultural and Tribal cultural resources that may be discovered accidentally, 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 9.47 tons/year as compared to existing conditions. 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 implement erosion and runoff control conditions of approval, the proposed project is not anticipated to contribute cumulatively to sediment production project's watersheds. 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.

Hydrology and Water Quality – Section X:

Water use calculations provided in the Tier 1 WAA prepared by Richard C. Slade and Associates (May 2025 – **Exhibit E**) indicate that the proposed development consisting of approximately 14 net acres of planted vineyard would result in approximately 10.5 AF/yr of groundwater use (including 7 AF/yr for irrigation and 3.5 AF/yr for heat protection). In total, when combined with existing uses onsite water demand would total approximately 30.77 AF/yr. 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; a reduction in average rainfall under extreme drought conditions would not significantly affect demand as a percentage of recharge; there is no evidence to date indicating that there are groundwater problems or declining well production in the this area of the County; and incorporation of the standard groundwater management condition of approval would reduce potential impacts associated with groundwater use.

As discussed in **Section X (Hydrology and Water Quality)** a Hydrologic Analysis was prepared by Applied Civil Engineering (May 2025 – **Exhibit F**). Because the proposed project would not result in a change in an increase in land use cover factors, 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 (**Exhibit F**). 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 the conversion of important farmland, forestland, or timberland. 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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LIST OF EXHIBITS:

- Exhibit A-1 Keller Yountville Vineyard LLC., Track 1 Erosion Control Plan
- Exhibit A-2 Erosion Control Plan Narrative
- Exhibit A-3 Vineyard Development & Operations Traffic and Practice
- Exhibit B-1 Biological Resources Reconnaissance Survey
- Exhibit B-2 Biological Resource Reconnaissance Survey Response to Comments
- Exhibit B-3 Vegetation Retention Analysis
- Exhibit C Landslide Hazard Evaluation
- Exhibit D Soil Loss Analysis
- Exhibit E Water Availability Analysis
- Exhibit F Hydrologic Analysis
- Exhibit G Project Revision Statement