

**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:** Constellation Brands Inc., Wappo Hill Vineyard Conversion, Erosion Control Plan Application File #P24-00213-ECPA
2. **Property Owner(s):** Constellation Brands Inc.
3. **Contact Person, Phone Number and Email:** Donald Barrella, Principal Planner, 707-299-1338, donald.barrella@countyofnapa.org
4. **Project Location and Assessor's Parcel Number:** No Situs Address, Napa County, CA 94558  
 Assessor's Parcel Numbers 039-040-050 and 039-040-054, **Figures 1 and 2**  
 Section 5, Township 6 North Range 4 West, Mt. Diablo Base and Meridian  
 Latitude 38° 23' 37" N / Longitude 122° 19' 54" W
5. **Project Sponsor:** Blake Wood  
 Constellation Brands Inc.  
 207 High Point Drive  
 Victor NY 14564  
**Agent:** Matthew Bueno, RPE #84114  
 PPI Engineering  
 2800 Jefferson Street  
 Napa, CA 94558
6. **General Plan Designation:** Agricultural Resource (AR)
7. **Zoning:** Agricultural Preserve (AP)
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 18.4 gross acres of vineyard (i.e., proposed development area or project area) with approximately 12.3 net planted acres in nine vineyard blocks, located on an approximate 437.7-acre holding (i.e., project site). The acreages of each of the nine vineyard blocks are indicated in **Table 1**. The proposed project includes the removal of 338 trees with a size greater than 6-inches diameter at breast height (DBH) and an 18-acre Tree Preservation Area (Figure 5, **Exhibit A**).

**Table 1 – Proposed Vineyard Block Acreage**

Block	Net Acreage	Gross Acreage
1A	3.1	4.2
1B	1.2	2.0
1C	0.5	0.7
2	2.9	4.3
3A	1.4	2.1
3B	0.2	0.4
4	1.7	2.2
5A	0.7	1.3
5B	0.6	1.2
<b>Total</b>	<b>12.3</b>	<b>18.4</b>

Source: PPI Engineering, 2024 – **Exhibit A**

The proposed vineyard would be irrigated with a combination of recycled water provided by the Town of Yountville and existing water rights (**Exhibits E-1 and E-2**); the anticipated water demand for irrigation would be approximately 6.2 acre-feet per year (AF/year). Rock removed during vineyard development would be used to construct erosion control features such as rock-filled avenues or used on existing roads. Short-term stockpiles, if needed, would be located within the proposed development area; no long-term stockpiles are proposed. There would be no transport of spoils off-site. Approximately 1,200 feet of new wildlife exclusion fencing (i.e. deer fencing) is proposed (±350 feet at the north end of Block 1A and ±850 feet around Block 3A), that will connect to existing wildlife exclusion fencing located throughout the holding (see **Figure 2** of **Exhibit A**). Approximately 1,400 feet of new main irrigation pipelines would be installed in existing vineyard avenues and access roads (driveway), that would connect to existing main irrigation lines within the holding (see **Figure 4** of **Exhibit A**). Existing drainage diversion ditches and culverts would be repaired and maintained as needed.

**Erosion Control Measures:** Temporary erosion control measures include installation of straw wattles, the application straw mulch at a rate of 3,000 pounds per acre, and other practices as needed. Permanent erosion control measures include the repair/reconstruction and maintenance of existing diversion ditches as necessary, insloped avenue between Blocks A1 and A2 and associated rock level spreader at the south end of Block 1A, subsurface drainage line and associated drop inlet in Block 5A (connecting to an existing diversion ditch), and a permanent no-till

cover crop maintained with the following minimum plant residue densities: 75% for proposed Block 1C; 80% for proposed Blocks 1A, 2, 4, 5A and 5B; and 85% for proposed Blocks 1B, 3A and 3B. Details of the proposed erosion control measures are provided in the Constellation Brands Inc., Wappo Hill Track I Erosion Control Plan prepared by PPI Engineering, Napa, California (**Exhibit A**).

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

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

- a. Installation of a raptor perch along the southwest side of Vineyard Block 1A (see **Figure 3 of Exhibit A**).
- b. Installation of vineyard trellis and drip irrigation systems, and planting rootstock in an 8-foot by 4-foot spacing pattern for an approximate vine density of approximately 1,361 vines per acre.
- c. Ongoing inspection and maintenance of temporary and permanent erosion and runoff control measures.
- d. Ongoing operation and maintenance of the vineyard and associated infrastructure, 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, weed whacking, and the use of strip spraying or hand-cultivation around the base of the vines. Mildewcides and herbicides may also be used for mildew and weed management. Herbicides may be applied in spring (no earlier than February 15 to ensure adequate vegetative cover in the spray strips for the remainder of the rainy season).

**Table 2** lists a general schedule for the construction of the proposed project as identified in #P24-00213-ECPA and **Table 3** outlines typical general ongoing vineyard operations. The vineyard is anticipated to be developed in one phase, with construction occurring for up to six months during the year. The final implementation schedule is pending action on #P24-00213-ECPA.

**Table 2 – Implementation Schedule**

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

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

**Table 3 – Typical Annual Operations Schedule**

January to February	a. Prune vines.
March to August	a. Sulfur application to protect against mildew. b. Mow 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 up to seven truck trips to deliver and remove construction equipment during the first two weeks of project construction and over the last two months of project construction and an estimated four round trips per day for anticipated work crews of up to 20 employees, six days per week. Anticipated construction equipment includes tracklaying and rubber-tired vehicles and could include bulldozers, tractors, excavators, backhoes, dump trucks, water trucks, passenger vehicles and/or light trucks, and ATVs.

Typical vineyard operations for both the existing vineyards in the holding and for the proposed vineyard 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. On the days when these activities occur it is anticipated there would be between one to approximately five round trips for work crews of between two and 10 workers. Peak vineyard operational activities which include pruning and harvest generate up to approximately 28 round trips per day for anticipated work crews of up to 40 employees, plus two grape haul truck trips per day during harvest according to the applicant. Anticipated equipment for vineyard operations would include tractors, passenger vehicles and/or light trucks, and ATVs; during harvest grape haul trucks would also be utilized. The applicant has also indicated that these workers already travel to and from the site to manage and maintain the existing vineyards in the holding as described above, and that no new or additional trips to the project site are anticipated as part of the project.

Implementation of the proposed project would be in accordance with the Constellation Brands Inc., Wappo Hill Track I Erosion Control Plan prepared by PPI Engineering (March 2025 - **Exhibit A**). The proposed project is further described in the application materials including the

Supplemental Project Information sheets. All documents are incorporated herein by reference and available for review in the Napa County Department of Planning, Building and Environmental Services (PBES), and at [Current Projects Explorer | Napa County, CA](#)

## 9. Describe the environmental setting and surrounding land uses.

The project site includes two parcels (APNs 039-040-050 & 039-040-054) encompassing approximately 437.7-acres is located approximately 0.6 mile east/southeast of the Town of Yountville on the west side of Silverado Trail approximately 2.1 miles north of its intersection with Oak Knoll Avenue (**Figures 1-3**). The two project parcels are also part of a larger holding that includes APNs 039-040-041 and 039-051-024: or the purposes of this initial study 'Holding' shall mean the four parcels (APNs 039-040-050, 039-040-054, 039-040-041 and 039-051-024) that make up the entire Constellation holding that totals approximately 511.9-acres.

Geographically the project site is situated on the east side of Napa Valley on south flank of Wappo Hill in the Stags Leap area of Napa County. The general topography in the vicinity of the project site consists of the relatively flat Napa Valley which surrounds Wappo Hill and foot slopes of the Eastern Mountains to the east. The project site is at elevations ranging from approximately 70 to 400 feet above mean sea level. Average slopes in the proposed development area range from 10% to 34%, with an average slope of 23%: approximately 1.3-acres of the development area are located on slopes over 30%.

The project site is located within the Chase Creek and Napa River Yountville Reach Drainages<sup>1</sup>. The Napa River, a U.S. Geological Survey (USGS) blue-line stream, is generally coterminous with the holding's western and southern property lines, and Chase Creek, a blue-line tributary to the Napa River, generally runs through the eastern portion of the holding in a north south direction (see **Figure 1**). There are approximately seven (7) other minor ephemeral drainages located within the northern end of the project site. All but one of these ephemeral drainages are disconnected from the Napa River and Chase Creek. The ephemeral drainage located in the western side of the holding is connected to the Napa River, this ephemeral is located approximately 700 feet from the project area at its closest point. The Napa River is located over 450 feet from the project area at its closest point (from Block 5 located at the southern extent of the project area), the next closest point is over 1,250 feet (from Block 1 at the western extent of the project area). Drainage from the project site is characterized by surface sheet flow with runoff generally flowing toward the Napa River and Chase Creek. Only a portion of the southern and southeastern ends of the holding are located in the Napa Valley Subbasin Groundwater Sustainably Agency (GSA) boundary, the remainder of the holding is not within the GSA.

Surrounding properties are predominantly used for agricultural (vineyard) and rural residential purposes: to the south, east, and west the project site is generally surrounded by vineyards. Immediately to the north of the holding there is also approved vineyard (Disiree Inc., P24-00213-ECPA, 16.7-acres, approved November 2025, SCH #2025091119) and proposed vineyard (Realm Cellars Hartwell Vineyard, P24-00284-ECPA, 9.7-acres). Wappo Hill is essentially an island of habitat consisting of mixed woodlands and grassland, interspersed with smaller vineyard developments within the larger Napa Valley that is dominated by vineyard encircling the Wappo Hill area.

The Realm Winery and Stags Leap Wine Cellars are located approximately 0.25 miles north/northeast of the project site. Within the central/west-central portion of the holding is the Mondavi Farmworker Housing Center (5589 Silverado Trail, APN 039-040-053, Lands of the Napa County Housing Authority). The closest residences to the project site are 5581 and 5585 Silverado Trail which are approximately 60 feet from proposed Vineyard Blocks 4 and 5, the next closest residences are located over 0.25 miles to east of the project area.

An existing private driveway from Silverado Trail that provides access to 5581, 5585 and 5589 Silverado Trail also provides access to the proposed development areas and the larger Constellation holding. Existing improvements on the project site and holding include approximately 295 net (planted) acres of vineyard, an existing network of ranch roads and drainage improvements (diversion ditches, culverts and outfalls), four (4) water storage reservoirs and associated infrastructure (main water lines, pump and fill stations, and vineyard irrigation systems), and three (3) agricultural storage/accessory buildings that include a farm center, offices, and tractor/farm equipment storage and associate septic system(s). See **Exhibit E-2** for water rights associated with the four reservoirs.

The holding's existing vineyards (approximately 320-acres) were developed prior to 1991 with a vast majority located on lands with a slope of 5% or less which do not require an ECPA. The following Track II erosion control plans to redevelop/replant existing vineyard on slopes over 5% have been issued to the holding: #P18-00127-ECPA for 12.5-acres approved April 27, 2018; #P112-00267-ECPA for 5.2-acres approved August 5, 2011; #P23-00283 a for 29.4-acres approved October 30, 2023; and #99359-ECPA for 7-acres approved March 3, 2000.

Soils in the proposed development area are predominately classified according to the Soil Survey of Napa County (USDA 1978) as Sobrante Loam (Soil Classification #179) and Forward Silt Loam (Soil Classification #139), two other soil types in the development area include Bale Clay Loam (Soil Classification #105) and Perkins Graveley Loam (Soil Classification #169)<sup>2</sup>. The closest active faults are the West Napa Fault and the Soda Creek Fault located approximately 1.2 and 2.3 miles west and east of the project site, respectively (Napa County GIS Fault Layers).

<sup>1</sup> Approximately 1.5-acres of the proposed development, located along the western periphery of Vineyard Block 1A, is located in the Napa River Yountville Reach Drainage.

<sup>2</sup> There is approximately 0.25-acres of Bale Clay Loam (Soil Classification #105) located in the southern end of Vineyard Block 2, and Vineyard Block 1C totaling 0.7-acres contains Perkins Graveley Loam (Soil Classification #169).

The vegetation types within the holding include Valley Oak Woodland, Coast Live Oak Woodland, Blue Oak Woodland, Coyote Brush Scrub, non-native grassland, seasonal wetlands, and vineyard and other developed/disturbed lands. Vegetation types within development areas Coast Live Oak Woodland, Blue Oak Woodland, Coyote Brush Scrub, non-native grassland and developed/disturbed land.

10. **Other agencies whose approval may be required** (e.g., permits, financing approval, or participation agreement that may potentially be required from the identified permitting authority/agency).

**Responsible (R) and Trustee (T) Agencies**

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

**Other Agencies Contacted**

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

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

Notice of the proposed project was sent via certified mail and email to the Mishewal Wappo Tribe of Alexander Valley, the Middletown Rancheria, and the Yocha Dehe Wintun Nation on August 28, 2024.

On August 29, 2024, the Middletown Rancheria responded that the project site is not within their area of concern and therefore the invitation for consultation was declined. The County acknowledged the response in a letter and email dated October 10, 2024, and closed the consultation invitation.

No response to the invitation was received from the Yocha Dehe Wintun Nation. On October 10, 2024, the County sent a consultation closure notice via email and the US Postal Service to the Yocha Dehe Wintun Nation.

No response to the invitation was received from the Mishewal Wappo Tribe, and on October 10, 2024, the County sent consultation closure notices via email and the US Postal Service to the Mishewal Wappo Tribe. On October 13, 2024, the County received an email from the Mishewal Wappo Tribe in response to the closure notice sent on October 10<sup>th</sup> requesting consultation. In an October 21, 2024, phone conversation with Scott Gabaldon of the Mishewal Wappo Tribe and follow up email the County agreed to incorporate tribal monitoring and cultural sensitivity training into the proposed project. The measures are disclosed and detailed in **Section XVIII (Tribal Cultural Resources)** of this initial study.

## 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 checked="" 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 checked="" 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 type="checkbox"/> Tribal Cultural Resources                     |
| <input type="checkbox"/> Utilities/Service Systems       | <input type="checkbox"/> Wildfire                            | <input checked="" 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 #P24-00213-ECPA as listed below, and the environmental background information contained in the permanent file on this project. These documents and information sources are incorporated herein by reference and available for review at the Napa County Department of Planning, Building and Environmental Services located at 1195 Third Street, Suite 210, Napa, CA 94559, or the [Current Projects Explorer | Napa County, CA](#)

- PPI Engineering, March 2025, Constellation Brands Inc., Wappo Hill Erosion Control Plan (**Exhibit A-1**)
- PPI Engineering, June 16, 2025, Constellation Brands Inc., Wappo Hill, 1:1 GHG Mitigation (**Exhibit A-2**)
- Wildlife Research Associates, May 2024, Biological Resources Reconnaissance Survey (**Exhibit B-1**)
- Wildlife Research Associates, February 6, 2025, Response to Application Completeness Determination (Biology), Wappo Hill Vineyard Conversion ECPA #P24-00213-ECPA(**Exhibit B-2**)
- Flaherty Cultural Resource Services, May 6, 2024, Cultural Resource Reconnaissance of ±19 Acres near Yountville, Napa County, California (a portion of APN 039-040-050 and -054, Constellation' Wappo Hill Property) (**contents confidential**)
- PPI Engineering, August 8, 2024, Constellation Wappo Hill Track I ECP, Soil Loss Analysis (**Exhibit C**)
- RGH Consultants, November 8, 2024, Landslide Hazard Evaluation, Wappo Hill Vineyard (**Exhibit D**)
- PPI Engineering, March 11, 2025, P24-00213-ECPA, Wappo Track I ECP Water Source Memorandum including Recycled Water Use Agreement (**Exhibit E-1**)
- Constellation Brands Inc., Wappo Hill Holding Water Rights (**Exhibit E-2**)
- PPI Engineering, August 12, 2024, Constellation Wappo Hill Track I ECP, Hydrologic Analysis (**Exhibit F**)
- Site inspection conducted by Napa County Engineering and Conservation Division staff (Alexei Belov and Donald Barrella) September 10, 2024.
- 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

Donald Barrella  
\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
May 14, 2026  
Date

\_\_\_\_\_  
Napa County Planning, Building and Environmental Services

**ENVIRONMENTAL CHECKLIST FORM**

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>I. AESTHETICS.</b> 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 checked="" type="checkbox"/>	<input 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 in the Napa Valley Agricultural Preserve 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 near a scenic vista, and there are no historic buildings on site. There are also no significant rock outcroppings or geologic features on the project site that would be impacted by the proposed project.

Land uses surrounding the project site include agricultural and rural residential and the proposed project would be consistent with these surrounding land uses. Because vineyard is a common visual characteristic in the valley floor, the addition of 18.4-acres of vineyard, that are dispersed into five smaller vineyard develop areas, would not be out of character within the surrounding environment which consists predominately of vineyards interspersed with some residential development and open space

The project site is not located within the vicinity of an officially designated state scenic highway. Highway 29, which is listed as eligible, is located approximately 1 mile to the west (Napa County GIS Road Layer; California State Scenic Highway System Map). The project areas are located between two designated scenic corridor roads, approximately 1 mile east of Highway 29 and approximately 0.25 to 0.6 miles west of Silverado Trail, which are both Napa County-designated viewshed roads (Napa County GIS, Viewshed roads and Scenic Corridors Layers). Both Highway 29 and Silverado Trail are approximately 70 feet above mean sea level (msl) in this area. Portions of the project areas are located on the southern foot slopes of Wappo Hill, and the foot slopes of a smaller knoll located approximately 1,500 feet south of Wappo Hill. Neither of these areas are located on a major or minor ridgeline (Napa County GIS, Ridgelines Layer).

Because Highway 29 is approximately 70 feet above msl and the project areas are on the foot slopes of Wappo Hill and the smaller southern knoll at elevations ranging from approximately 70 to 400 feet above msl, in addition to existing vegetation, the project is not visible from Highway 29.

While the proposed project would be in character with the site and surrounding areas, the removal of the oak woodlands and associated vegetation in proposed Vineyard Blocks 5A and 5B that currently provide screening vegetation of the residential developments at 5581 Silverado Trail (APN 039-040-047, Lands of Robert and Isabel Mondavi) and 5585 Silverado Trail (APN 039-040-048, Lands of Robert Mondavi Jr. and Lydia Mondavi) as seen from Silverado Trail. Removal of this screening vegetation would conflict with General Plan Community Character Policy CC-5, which is considered a potentially significant impact.

Community Character Policy CC-5 states: Recognizing that vineyards are an accepted and attractive visual feature of Napa County, but that visual changes can cause public concern, the County shall require the retention of trees in strategic locations when approving conversion of existing forested land to vineyards in order to retain landscape characteristics of the site when viewed from public roadways and shall require the retention of trees to screen non-agricultural activities and other proposed developments.

To remediate this potential General Plan policy inconsistency and reduce impacts to a less than significant level, **Mitigation Measure AES-1** will be implemented. **Mitigation Measure AES-1** will require the removal of proposed Vineyard Blocks 5A and 5A from the project. This measure would reduce the project by 2.5 gross acres and 1.3 net planted acres. It should also be noted that this measure is being implemented in conjunction with and in support of **Mitigation Measure BIO-1** to further protect and preserve trees and woodland with higher biological value and reduce potentially significant biological impacts to at less than significant level. As such, this measure would not

only support consistency with Policy CC-5 it would avoid and preserve approximately 78 trees within approximately 1-acre of oak woodland, which includes 3 valley oak trees, a granary tree and a bat habitat tree. See Section IV Biological Resources for additional information.

Therefore, for the reasons described above, the proposed project with incorporation of **Mitigation Measure AES-1** would have less-than-significant impacts on a scenic vista, scenic highway, historic buildings, scenic trees, rock outcrops, and the visual character and quality of the project site and surroundings.

**Mitigation Measure AES-1:** The owner or permittee shall revise Erosion Control Plan #P24-00213-ECPA prior to approval to remove Vineyard Blocks 5A and 5B to reduce potentially significant impacts to Community Character and achieve consistency with Policy CC-5.

- d. Proposed agricultural operations of the project would require some lighted nighttime activities consistent with the nighttime activities already occurring on the project site and within the immediate area, which include extensive vineyard operations and maintenance. Lighting would be in the form of headlights or downward direction lights on equipment being used during nighttime activities that include Sulphur and pesticide/herbicide application and harvesting. Sulphur and pesticide/herbicide applications are anticipated to occur approximately 14 days and harvest is also anticipated to last approximately 14 days typically occurring in September and October. These nighttime activities typically occur at times ranging from 8 p.m. to 7 a.m. Although some nighttime activity would occur for limited periods, the proposed project would not introduce a new source of substantial light or glare as these activities are already occurring on the project site, 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
<b>II. AGRICULTURE AND FORESTRY RESOURCES.</b> 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 is not mapped as “Prime Farmland, Unique Farmland, or Farmland of Statewide Importance” by the California Department of Conservation (California Important Farmland Finder<sup>3</sup>): the site is mapped as ‘Other Lands’. The proposed project would result in an increase in productive agricultural farmland on the project site. Therefore, the proposed project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use, and there would be no impact.

<sup>3</sup> <https://maps.conservation.ca.gov/DLRP/CIFF/>

b. The project site has an Agricultural Resource (AR) General Plan designation and is zoned Agricultural Preserve (AP) (Napa County GIS Zoning Layer). Therefore, the establishment of vineyards totaling approximately 18.4 gross acres with approximately 12.3 net planted acres is consistent with project site’s land use and zoning designations. Neither of the two parcels that make up the project site have a Williamson Act contract (Napa County GIS, Agricultural Contracts layer). 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. 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 project site contains developed/ruderal land, non-native grassland, coyote brush scrub, and blue oak and coast live oak woodland, there is no mapped coniferous forest in the project site (Wildlife Research Associates, May 2024 – **Exhibit B-1**). Three coast redwood trees would be removed; however, these trees are not native to the project site Wildlife Research Associates, February 2025 – **Exhibit B-2**). The project site is neither zoned as forest land as defined in Public Resource Code Section 12220(g) nor designated as a Timberland Production Zone (TPZ) as defined in Government Code Section 51104(g). Therefore, the proposed project would not conflict with existing zoning of forest land and would also not result in the loss of forest land or the conversion of forest land to non-forest use. Therefore, there would be no impacts to Forest Land or TPZs.

e. Construction of the proposed vineyard would not result in the conversion of existing farmland or forestland in the area to non-agricultural use. As such, the proposed project would have no impact on agricultural and forestry resources.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>III. AIR QUALITY.</b> Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 Bay Area Air Quality Management District (BAAQMD) has published CEQA guidance titled *BAAQMD CEQA Air Quality Guidelines* (referred to as CEQA Guidelines) to assist lead agencies in evaluating air quality and climate impacts from proposed land use projects and plans.<sup>4</sup> The 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 BAAQMD CEQA Guidelines do not replace the State CEQA Statute and Guidelines; rather, they are designed to provide BAAQMD-recommended procedures for evaluating potential air quality and climate impacts during the environmental review process that are consistent with CEQA requirements. The BAAQMD published its most recent update to the CEQA Guidelines on April 20, 2023, which is referred to as the

<sup>4</sup> 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).

2022 CEQA Guidelines<sup>5</sup>. The 2022 Guidelines supersede BAAQMD's previous CEQA guidance titled *BAAQMD CEQA Air Quality Guidelines* (2017). The potential air quality impacts associated with construction and operation of the proposed project were evaluated consistent with BAAQMD's 2022 CEQA Guidelines.

- a. The project site is generally located along the eastern side of Napa Valley, within the Napa County climatological subregion of SFBAAB, which is under the jurisdiction of BAAQMD. The topographical and meteorological features of the Napa Valley subregion create the potential for air pollution. In the short term, potential air quality impacts are most likely to result from construction activities. Construction-related emissions, which are temporary in nature, mainly consist of particulate matter (PM) generated from fugitive dust during grading or other earthmoving activities and other criteria pollutants generated through the exhaust from construction equipment, vehicular haul and worker trips, and the burning of any project area vegetation<sup>6</sup>. In the long term, potential air quality impacts would likely result from ongoing activities associated with the operation and maintenance of the proposed vineyard. Operational-related emissions, which are seasonal in nature, are primarily generated from vehicular trips associated with workers traveling to and from the site, truck trips hauling harvested grapes, and use of equipment necessary for ongoing vineyard maintenance. Refer to **Section XVII (Transportation)** for the anticipated number of construction- and operation-related trips.

Ambient air quality standards have been established by State and federal environmental agencies for specific air pollutants most pervasive in urban environments. These pollutants are referred to as criteria air pollutants because the standards established for them were developed to meet specific health and welfare criteria set forth in the enabling legislation. Criteria air pollutants include ozone, carbon monoxide, nitrogen dioxide, sulfur dioxide, respirable particulate matter less than 10 microns in diameter (PM<sub>10</sub>), fine particulate matter less than 2.5 microns (PM<sub>2.5</sub>), and lead. Air basins (or portions thereof) are categorized as "attainment," "nonattainment" or "unclassified" for each criteria air pollutant based on whether ambient air quality standards have been achieved. The SFBAAB is currently designated as a nonattainment area for the federal 8-hour ozone standard, State 1-hour and 8-hour ozone standards, State annual and 24-hour PM<sub>10</sub> standards, federal 24-hour PM<sub>2.5</sub> standard and the State annual PM<sub>2.5</sub> standard. Therefore, the criteria air pollutants of concern in the SFBAAB are reactive organic gases (ROG) and oxides of nitrogen (NO<sub>x</sub>) which are referred to as ozone precursors, as well as PM<sub>10</sub> and PM<sub>2.5</sub>.

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).<sup>7</sup> 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"<sup>8</sup> that are potent climate pollutants in the near-term; and decrease emissions of carbon dioxide by reducing fossil fuel combustion.<sup>9</sup>

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

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

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

The Clean Air Plan contains 85 control measures aimed at reducing air pollution in the SFBAAB, and projects that incorporate all feasible air quality plan control measures are considered consistent with the Clean Air Plan. Of these, the only control measure applicable to the proposed project is Transportation Control Measure TR22 that addresses emissions from construction equipment. Control measure TR22

<sup>5</sup> <https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines>

<sup>6</sup> Assuming burning to be conservative.

<sup>7</sup> 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](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).

<sup>8</sup> "Super-GHGs" are climate pollutants that have a powerful ability to contribute to global warming, such as methane, black carbon, and fluorinated gases.

<sup>9</sup> 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](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).

uses various strategies to reduce emissions from construction and farming equipment (e.g., incentives for equipment upgrades and/ or use of renewable electricity and fuels). Since 2009, the BAAQMD has provided more than \$38 million to replace and/or upgrade hundreds of pieces of older, often uncontrolled equipment used in construction, cargo-handling and agricultural operations with newer units that have engines certified to the cleanest available standards. The proposed project would benefit from this ongoing program and would not conflict with its implementation. Therefore, the proposed project would not be inconsistent with nor hinder implementation of any of the Clean Air Plan control measures. Therefore, the proposed project would not conflict with or obstruct implementation of the Clean Air Plan. The impact would be less than significant.

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

**Table 4 – BAAQMD Thresholds of Significance for Construction and Operation**

Pollutant	Construction	Operation	
	Average Daily (pounds per day)	Average Daily (pounds per day)	Annual (tons per year)
ROG	54	54	10
NO <sub>x</sub>	54	54	10
PM <sub>10</sub> <sup>a</sup>	82	82	15
PM <sub>2.5</sub> <sup>a</sup>	54	54	10
Fugitive Dust	Construction Dust Ordinance or other best management practices.	Not applicable	Not applicable

<sup>a</sup> Includes PM emissions from exhaust only. Source: BAAQMD CEQA Guidelines April 2023.

For construction-related emissions of fugitive dust, the BAAQMD recommends that lead agencies take a qualitative approach to determine impact significance; the CEQA Air Quality Guidelines state that a project would be considered to have a less-than-significant impact with regard to fugitive dust emissions of PM<sub>10</sub> and PM<sub>2.5</sub> if BAAQMD Basic Construction Mitigation Measures are implemented during construction.

In order to assess potential air pollutant emissions from the proposed project, a review of the analysis of emissions associated with vineyard development/construction and operations performed for the CEQA analysis of three recent vineyard projects in Napa County was completed: Stagecoach North Vineyards<sup>10</sup> for an approximately 91-acre vineyard development, KJS and Sorrento Vineyard<sup>11</sup> for an approximately 98-acre vineyard development, and Le Colline Vineyards<sup>12</sup> for an approximately 28-acre vineyard development<sup>13</sup>.

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

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

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 18.4 gross acres of vineyard. During construction, vineyard installation is anticipated to generate up to seven truck trips to deliver and remove construction equipment during the first two weeks of project construction and over the last two months of project construction and about four trips per day for anticipated work crews of up to 20 employees. Anticipated construction equipment would be limited to tracklaying and rubber-tired vehicles and could include typical vineyard construction equipment including bulldozers, tractors, excavators, backhoes, dump trucks, water trucks, passenger vehicles and light trucks.

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

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

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

13 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 <sup>A</sup>			
	ROG	NO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Stagecoach North vineyard <sup>1 B</sup>	0.08	0.75	0.03	0.03
KJS and Sorrento vineyard <sup>2 B</sup>	0.05	0.42	0.02	0.02
Le Colline vineyard <sup>3 B</sup>	0.24	2.33	0.10	0.09
<b>Average</b>	0.12	1.17	0.05	0.05
<b>Project Construction Emissions based on Average<sup>A</sup></b>	2.21	21.47	0.91	0.83
<b>Construction threshold<sup>A</sup></b>	54	54	82	54
<b>Significant?</b>	No	No	No	No
Emissions and Thresholds	Operational Emissions <sup>4, 5, A</sup>			
Stagecoach North 91-acre vineyard operation <sup>1 B</sup>	0.01	0.08	0.01	<0.01
KJS and Sorrento 98-acre vineyard operation <sup>2 B</sup>	<0.01	<0.01	<0.01	<0.01
Le Colline 28.5-acre vineyard operation <sup>3 B</sup>	<0.01	<0.01	<0.01	<0.01
<b>Average<sup>A</sup></b>	<0.01	0.03	<0.01	<0.01
<b>Project Operational Emissions based on Average<sup>A</sup></b>	0.05	0.54	0.06	0.03
<b>Operational threshold<sup>A</sup></b>	54	54	82	54
<b>Significant?</b>	No	No	No	No
Emissions and Thresholds	Operational Emissions <sup>4 C</sup>			
Stagecoach North 91-acre vineyard operation <sup>1 C</sup>	<0.01	0.01	<0.01	<0.01
KJS and Sorrento 98-acre vineyard operation <sup>2 C</sup>	<0.01	<0.01	<0.01	<0.01
Le Colline 28.5-acre vineyard operation <sup>3 C</sup>	<0.01	<0.01	<0.01	<0.01
<b>Average<sup>C</sup></b>	<0.01	<0.01	<0.01	<0.01
<b>Project Operational Emissions based on Average<sup>C</sup></b>	0.01	0.1	0.01	<0.01
<b>Operational threshold<sup>C</sup></b>	10	10	15	10
<b>Significant?</b>	No	No	No	No

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

1 As identified in Stagecoach North EIR

A – Pounds per day

2 As identified in KJS and Sorrento EIR

B – Pounds per acre per day

3 As identified in Le Colline Vineyard EIR

C – Tons per year

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, Vineyard Carbon Emissions Stock and Sequestration Calculator, Napa County March 2026; CEQA Guidelines April 2023.

Daily construction emissions associated with the proposed project’s 18.4 gross acre vineyard development (approximately 12.3 net-planted acres) were estimated using the average pounds per day estimated for the three vineyard projects described above and shown in **Table 5**. As shown in **Table 5**, short-term construction emissions associated with the proposed project would be well below the BAAQMD’s daily construction thresholds.

Once completed, primary project operations would include activities such as vineyard pruning, weed and pest control, and harvest. Peak operations are anticipated to generate up to seven round trips per day for anticipated work crews of up to 20 employees, plus two grape haul trips. Anticipated equipment for vineyard operations would be limited to tracklaying vehicles, ATVs, and hand tools. Vineyard operations would be similar to the other three vineyard projects discussed above and the project proposes to develop a vineyard in a smaller area than the projects shown in **Table 5**. Therefore, operational emissions associated with the proposed project would be less than those shown in **Table 5** and well below both the daily and annual thresholds.

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

**Air Quality – Conditions of Approval:**

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

- a. Post a publicly visible sign with the telephone number and person to contact at the lead agency regarding dust complaints. The BAAQMD’s phone number shall also be visible.
- b. Water all exposed surfaces (e.g., parking areas, staging areas, soil piles, grading areas, and unpaved access roads) up to two times per day as necessary.
- 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 (as necessary) 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. Water and/or dust palliatives shall be applied in sufficient quantities during grading and other ground disturbing activities onsite to minimize the amount of dust produced. Outdoor construction activities shall not occur when average wind speeds exceed 20 mph.
- i. All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified visible emissions evaluator. Any portable engines greater than 50 horsepower or associated equipment operated within the BAAQMD's jurisdiction shall have either a California Air Resources Board (ARB) registration Portable Equipment Registration Program (PERP) or a BAAQMD permit. For general information regarding the certified visible emissions evaluator or the registration program, visit the ARB FAQ<sup>14</sup> or the PERP website<sup>15</sup>.

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

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

The closest schools, Sunrise Montessori of Napa Valley, La Sagrada Familia Catholic International Home School Academy, and Unidos Middle School are all located approximately 3.5 miles south of the project site within the City of Napa (Napa County GIS, Schools Layer). The closest residences to the project site are 5581 and 5585 Silverado Trail which are approximately 60 feet from proposed Vineyard Blocks 4 and 5, the next closest residences are located over 0.25 miles to east of the project area. Additionally, within the central/west-central portion of the holding, located between ±600 and ±1,000 west of the project areas is the Mondavi Farmworker Housing Center (5589 Silverado Trail, APN 039-040-053, Lands of the Napa County Housing Authority).

During installation of the ECP, vineyard planting, and subsequent vineyard operations, TACs and odors would be created through the use of construction, grading, and farm equipment (e.g., tractors, trucks, bulldozers, and an excavator). These sources would occur approximately 3.5 miles from the closest school, approximately 60 feet from the nearest residence, and 600 feet from the Mondavi Farmworker Housing Center. Because these sources are seasonal in nature or temporarily occur in one phase over an approximately six-month construction period, 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
<b>IV. BIOLOGICAL RESOURCES.</b> Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<sup>14</sup> [http://www.arb.ca.gov/portable/perp/perpfaq\\_04-16-15.pdf](http://www.arb.ca.gov/portable/perp/perpfaq_04-16-15.pdf)

<sup>15</sup> <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**

Wildlife Research Associates conducted an assessment of biological resources present or potentially present in the project site (May 2024, **Exhibit B-1**). Biological resource surveys were conducted on April 11, May 18, and June 13, 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, 2024), California Native Plant Society Electronic Inventory (CNPS, 2024), and the U.S. Fish and Wildlife Service (USFWS) List of Federal Endangered and Threatened Species California Bird Species of Special Concern (USFWS, 2024). The CNDDDB and CNPS database searches included the St. Helena, Chiles Valley, Lake Berryessa, Rutherford, Yountville, Capell Valley, Sonoma, Napa and Mt. George USGS 7.5-minute quadrangles. The special-status wildlife evaluation considered database searches for the entirety of Napa County.

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

The vegetation types in the project site consist of developed lands (agriculture/vineyard), non-native annual grassland, coyote brush scrub, blue oak woodland, valley oak woodland, coast live oak woodland, reservoirs, and perennial open water (i.e. Napa River) (Wildlife Research Associates, May 2024 – **Exhibit B-1**). The proposed project would remove portions of the developed lands, non-native annual grassland, coyote brush scrub, blue oak woodland, and coast live oak woodland: the vegetation types and their acreages for both existing and proposed conditions are shown in **Table 6**.

**Table 6 – Vegetation Types in the Project Site and Proposed Development Area<sup>16</sup>**

Vegetation Types	Approximate Pre-Project Acres in Project Site	Approximate Acres in Proposed Development Area
Coast Live Oak Woodland	43.7	6.5
Blue Oak Woodland	2.3	0.5
Valley Oak Woodland	3.6	0.0
Coyote Brush Scrub	2.3	0.5
Non-native Annual Grassland	52.7	10.0
Developed	330.4	1.1
Reservoir	5.8	0.0
Perennial Open Water: Napa River	2.5	0.0
Seasonal Wetland	3.3	0.0
<b>Total</b>	<b>446.6</b>	<b>18.6</b>

Source: Wildlife Research Associates, May 2024 – **Exhibit B-1**

<sup>16</sup> The acreages identified in the project plans may slightly differ from acreages identified in the property's other various parcel and project reports and assessments, and associated CEQA disclosures/determinations due to the various mapping platforms, spatial characteristics, modeling data, and rounding utilized by the various preparers. Because approximate biological/plant communities, habitats, and project acreages have been corroborated through County GIS mapping, the values disclosed herein are considered by the County to be adequate for CEQA review, disclosure, and determination purposes of the subject application.

- a. **Special-Status Plants:** Based upon a review of the biological resource databases listed in **Exhibit B-1**, 79 special-status plant species have been documented in the vicinity of the project site. Of those, 11 species have a moderate to high chance to occur in the project site, including: Franciscan onion (*Allium peninsulare* var. *franciscanum*), Napa false indigo (*Amorpha californica* var. *napensis*), bent-flowered fiddleneck (*Amsinckia lunaris*), Clara Hunt's milk-vetch (*Astragalus claranus*), big-scale balsamroot (*Balsamorhiza macrolepis*), streamside daisy (*Erigeron biolettii*), nodding harmonia (*Harmonia nutans*), hayfield tarplant (*Hemizonia congesta* ssp. *congesta*), bristly leptosiphon (*Leptosiphon aureus*), Mt. Diablo cottonweed (*Micropus amphibolus*), 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, did not identify any special-status plant species (Wildlife Research Associates, May 2024 – **Exhibit B-1**).

The project as proposed would not remove special-status plants and/or populations, which is consistent with the following Napa County General Plan Conservation Element goals, policies, and Zoning Ordinance: General Plan Goal CON-3<sup>17</sup>, General Plan Policy CON-13<sup>18</sup>, and General Plan Policy CON-17.a<sup>19</sup>, and the purpose and intent of the Conservation Regulations (NCC Chapter 18.108) in that it preserves natural habitat or existing vegetation, and does not adversely affect sensitive, rare, threatened, or endangered plants.

**Special-Status Animals/Wildlife:** Based upon a review of the biological resource databases listed in **Exhibit B-1**, 60 special-status animal species have been documented to occur in Napa County. Of these special-status species 13 have a potential to occur in the project site, including: long-eared owl (*Asio otus*), white-tailed kite (*Elanus leucurus*), foothill yellow-legged frog (*Rana boylei*), Grasshopper Sparrow (*Ammodramus saviarum*), Brewster's yellow warbler (*Setophaga petechia brewsteri*), pallid bat (*Antrozous pallidus*), fringed myotis (*Myotis thysanodes*), long-legged myotis (*Myotis volans*), River lamprey (*Lampetra ayresi*), Hardhead (*Mylopharodon conocephalus*), Steelhead (*Oncorhynchus mykiss irideus*), Chinook Salmon (*Oncorhynchus tshawytscha*) and California freshwater shrimp (*Syncaris pacifica*).

Six of these species are entirely aquatic (foothill yellow-legged frog, river lamprey, hardhead, steelhead, chinook salmon and California freshwater shrimp) and would be confined to the Napa River or its banks, which is located over 450 feet from the project area at its closest point (from Block 5 located at the southern extent of the project area), the next closest point is over 1,250 feet (from Block 1 at the western extent of the project area). No special-status animal species were observed during the surveys conducted by the project biologist.

The seven special-status animal species, where their potential habitats have been identified in the project area or immediate vicinity and therefore have that have the potential to occur, are discussed further below (Wildlife Research Associates, May 2024 – **Exhibit B-1**).

The long-eared owl is a generally uncommon species and a resident throughout much of California outside of the Central Valley. Long-eared owls breed in a variety of woodland and forest habitats, including coniferous, oak and riparian, as well as planted tree groves. Nearby open habitats with small mammal populations, such as grasslands, meadows and marshes, are also required for foraging. Breeding typically relies on the presence of old nests made by similar-sized birds including hawks and crows. The trees within the proposed development area may contain cavities or exfoliating bark suitable for roosting.

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

The grasshopper sparrow is a summer resident in California, wintering in Mexico and Central America. This species occurs in open grassland and prairie-like habitats with short- to moderate-height vegetation, and often scattered shrubs (Shuford and Gardali 2008). Both perennial and annual (non-native) grasslands are used. Nests are placed on the ground and well concealed, often adjacent to grass clumps (Shuford and Gardali 2008). Grasshopper sparrows are secretive and generally detected by voice. Insects comprise the majority of the diet. The Study Area provides open grassland areas that are suitable for nesting, and this species has been recently observed in the vicinity (eBird 2018).

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17 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.

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

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

Brewster's yellow warblers are found throughout North America, including the entirety of California with few exceptions. Generally, breeding in California occurs along the coastline, Klamath and Cascade ranges, and northern Sierra Nevada. Nesting in California is most often in willow (*Salix* spp.) thickets situated in riparian settings at elevations ranging from 300 to 9,000 feet. Nests are constructed from a mix of plant fibers, feathers, and mammal hair which are typically located 10 to 40 feet above the ground in vertical forks of large shrubs and small trees, such as willows (*Salix* spp.). One to two broods may be produced in a season, with broods frequently abandoned due to nest parasitism from cowbirds (*Molothrus ater*). Their diet is composed primarily of insects supplemented by berries and seeds. This species was not observed; however, a bird survey was not performed during this assessment

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

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

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

The special-status bat and bird species identified above have the potential to be impacted during removal of the approximately 338 trees during project construction. Further, in addition to the special-status bird species discussed above, other migratory birds and raptors protected by the Migratory Bird Treaty Act and California Fish and Wildlife Code may also nest onsite, as the project site contains a variety of nesting habitat. Temporary and intermittent increases in noise levels during construction may cause nest abandonment and death of young or loss of reproductive potential at active nests located near project activities. These are considered potentially significant impacts.

Specific to individual trees the following would be removed: 254 coast live oakss,45 valley oaks, 24 black oaks,4 cork oaks, 3 blue oaks, 3 redwoods, 2 black walnuts, 1 buckeye, and 2 blue gums (i.e. eucalyptus). Of these trees 24 have the potential to support bat habitat and maternity roosts because they have substantial holes, cavities, and/or fissures in the bark, trunks, and/or large branches sufficient to provide roosting substrate. Additionally, there are two large valley oaks that have been identified as granary trees where woodpeckers have cached acorns (WRA February 2025, **Exhibit B-2**).

Because Wappo Hill is essentially an island of habitat consisting of mixed woodlands and grassland, interspersed with smaller vineyard developments within the larger Napa Valley that is dominated by vineyard encircling the Wappo Hill area, removal of these trees that provide significant ecological and biological value to animals in the immediate area is considered a potentially significant impact both on a project level as well as cumulatively. To reduce this potentially significant impact on local wildlife species to a less-than-significant level, **Mitigation Measure BIO-1** will be implemented. **Mitigation Measure BIO-1** will require the avoidance of two groups of trees that contain concentrations of trees with high ecological and biological value both within the immediate vicinity of the project and in the broader Napa Valley which lacks significant biological or ecological value. These trees are located in proposed Vineyard Blocks 1B (trees 299 through 302) and the northern end of Block 2 (trees 30 through 95), as shown in **Exhibit B-2** and **Figure 4 (Proposed Mitigated Project)**.

Implementation of **Mitigation Measure BIO-1** is anticipated to reduce the project by approximately 1.8, reduce tree removal by 69 trees, from 338 trees to 269 trees, avoid 10 of the 26 bat habitat trees and one of the granary trees, which includes avoidance of four valley oaks, a 54-inch DBH blue oak specimen, and four black oaks in the project area. Additionally, avoidance of the woodland area in Block 2 would

maintain some semblance of a connection with the woodlands and ephemeral drainages to the east and west of Block 2. When included with the tree avoidance associated with **Mitigation Measure AES-1**, that would avoid approximately 78 trees, which includes 3 valley oak trees, a granary tree and four bat habitat trees,

Overall, with implementation of **Mitigation Measure AES-1** and **Mitigation Measure BIO-1**, the proposed project would be reduced by 4.3-acres, from 18.4 gross acres to 14.1 gross acres, reduce oak woodland removal by approximately 2.5-acres from 7-acres to approximately 4.5-acres, and reduce tree removal by approximately 147 trees, from 338 trees to approximately 191 trees, and preserve 11 of the bat habitat trees, both of the granary trees, and seven valley oaks.

Project area removed because of this avoidance measure and **Mitigation Measure AES-1** will be included in a Preservation Area, as further described below in subsection e and **Mitigation Measure BR-4**, to ensure that avoided habitat trees and oak woodland removed as a result of this measure and **Mitigation Measure AES-1** are preserved consistent with applicable General Plan Goals and Policies, the Conservation Regulations, and to and to reduce potentially significant cumulative impacts on wildlife species, habitat trees and associated oak woodlands to a less than significant level.

Furthermore, to reduce potentially direct and indirect significant impacts on special-status and protected bird species, and to special-status bat species as a result of project tree removal to a less-than-significant level, **Mitigation Measure BIO-2** and **BIO-3** will be implemented. These measures will require preconstruction surveys for nesting birds and a two-phase removal process for identified bat habitat trees.

**Mitigation Measure BIO-1:** The owner or permittee shall revise Erosion Control Plan #P24-00213-ECPA prior to approval to include the following measure to reduce potentially significant direct, indirect and cumulative impacts to wildlife habitat, habitat trees with high biological and ecological value, bat habitat trees and granary trees, and oak woodlands and associated habitat:

- a. Revise the ECPA to avoid the following groupings of trees located in Vineyard Blocks 1B and 2: Block 1B, trees 299 through 302; Block 2, trees 30 through 95, in addition to removal of Blocks 5A and 5B pursuant to **Mitigation Measure AES-1**, as shown in **Exhibit B-2**, WRA February 2025, and **Figure 4 - Proposed Mitigated Project**.
- b. Setbacks from these woodland avoidance areas shall generally be between 5 and 10 feet from the dripline of the avoidance area: the buffer area shall not contain vineyard avenues or tractor turn-around areas. The final configuration of the avoidance areas, buffer widths, and overall project footprint shall be subject to review and approval by the County prior to incorporation into Erosion Control Plan #P24-00213-ECPA.

**Mitigation Measure BIO-2:** The owner or permittee shall revise Erosion Control Plan #P24-00213-ECPA prior to approval to include the following measures to minimize impacts associated with the potential loss and disturbance of special-status and nesting birds and raptors consistent with and pursuant to California Fish and Game Code Sections 3503 and 3503.5:

- a. For earth-disturbing activities occurring between February 1 and August 31, which coincides with the grading season of April 1 through September 15 – NCC Section 18.108.027.C, and bird breeding and nesting seasons, a qualified biologist, defined as knowledgeable and experienced in the biology and natural history of local avian resources with the potential to occur at the project site, shall conduct a preconstruction surveys for nesting birds within all suitable habitat on the development area, and where there is potential for impacts adjacent to the development area, typically within 500 feet of project activities. The preconstruction survey shall be conducted no earlier than 7 days prior to when vegetation removal and ground disturbing activities are to commence. Should ground disturbance commence later than 7 days from the survey date, surveys shall be repeated. A copy of the survey shall be provided to the Napa County Conservation Division and CDFW prior to commencement of work.
- b. After commencement of work if there is a period of no work activity of 7 days or longer during the bird breeding season, surveys shall be repeated to ensure birds have not established nests during inactivity.
- c. In the event that nesting birds are found, the owner or permittee shall identify appropriate avoidance methods and exclusion buffers in consultation with CDFW, the County Conservation Division and/or the U.S. Fish and Wildlife Service (USFWS) 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 CDFW and/or the USFWS. The buffer distances shall be specified to protect the bird's normal behavior to prevent nesting failure and abandonment and comply with Fish and Game Code Section 3500 et seq. and the federal Migratory Bird Treaty Act. The qualified biologist shall have authority to order the cessation of all nearby Project activities if the nesting birds exhibit abnormal behavior which may cause reproductive failure (nest abandonment and loss of eggs and/or young) until an appropriate buffer is established. The qualified biologist shall monitor the behavior of the birds (adults and young, when present) at the nest site to ensure that they are not disturbed by Project work. Nest monitoring shall continue during project development until the young have fully fledged, as determined by the qualified biologist, unless otherwise approved in writing by 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, such as removing or disturbing nests by physically disturbing trees with construction equipment, or audible, such as utilizing sirens or bird cannons, or chemical, such as spraying nesting birds or their habitats, would be considered an impact to nesting birds and is prohibited.

**Mitigation Measure BIO-3:** The owner or permittee shall revise Erosion Control Plan #P24-00213-ECPA prior to approval to include the following measures to minimize impacts associated with the potential loss and disturbance of special-status bat species:

- a. Prior to the commencement of earth-disturbing activities and tree removal a qualified biologist, having at least two years of experience conducting bat surveys that resulted in detections for relevant species, and experience with removal of bat habitat trees, shall clearly mark the bat habitat trees identified in the WRA February 2025 Survey Report for construction personnel and instruct them on the phased tree removal specified in **Mitigation Measure BIO-3.b**. The owner or permittee shall provide documentation to the Planning Department that bat habitat trees have been marked prior to the commencement of earth-disturbing activities and tree removal.
  - b. Bat habitat trees shall be trimmed and removed in a two-phased system conducted over two consecutive days. The first day (in the afternoon, under the direct supervision and instruction of a qualified biologist with experience conducting two-step tree removal, limbs and branches will be removed by a tree cutter using chainsaws only. Limbs with cavities, crevices and deep bark fissures will be avoided, and only branches or limbs without those features will be removed. On the second day, the entire tree will be removed. All felled trees shall remain on the ground for at least 24 hours prior to disposal to allow any present bats within the trees to escape.
- b-c. The Napa River, a U.S. Geological Survey (USGS) blue-line stream, is generally coterminous with the holding's western and southern property lines, and Chase Creek, a blue-line tributary to the Napa River, generally runs through the eastern portion of the holding in a north south direction, **Figure 1**. There are approximately seven other minor ephemeral drainages located within the northern end of the project site: see **Exhibit A** and **Exhibit B-1**. All but one of these ephemeral drainages are disconnected from the Napa River and Chase Creek. The ephemeral drainage located on the western side of the holding is connected to the Napa River, this ephemeral drainage is located approximately 700 feet from the project area at its closest point. The Napa River is located over 450 feet from the project area at its closest point (from Block 5 located at the southern extent of the project area), the next closest point is over 1,250 feet (from Block 1 at the western extent of the project area). The only riparian areas and vegetation within the holding are connected to the Napa River and associated Valley Oak Woodland, WRA, May 2024 – **Exhibit B-1**, which is between 450 to 1,250 feet from the project area as indicated above. The ECPA has been designed to provide setbacks from ephemeral streams well in excess of the 35-foot minimum pursuant to NCC 18.108.025(B)(1). The closest portion of an ephemeral stream to the project area is approximately 65 feet located on the northeast end of proposed Vineyard Block 2.

Three seasonal wetland complexes have been identified in the southern end of the project site in the area of proposed Vineyard Blocks 5A and 5B. One wetland complex is located over 600 feet to the west of the closest project area, the second complex is located over 200 feet to the south-southeast closest project area, the third is located immediately east of Vineyard Block 5A and 5B. The project has been designed to avoid all wetland complexes and for the complex adjacent to Vineyard Blocks 5A and 5B a minimum 50 foot buffer in conformance with NCC Section 18.109.026 (Wetlands): see **Exhibit A** Plan Sheets 1-3, and **Exhibits B-1** and **B-2**.

Furthermore, with implementation of **Mitigation Measure AES-1**, which will remove Vineyard Blocks 5A and 5B, the uplands above the adjacent wetland complex will be maintained to protect water quality of the wetland, in addition to maintaining an unfragmented (or cohesive) habitat area in this of the holding.

There are also several other smaller isolated seasonal wetlands features associated with some of the ephemeral drainages located in between Proposed Vineyard Blocks 1 and 2, and south of Vineyard Block 1. Generally, these smaller wetland features are located over 200 feet from the closest development area. One of these wetland features is located adjacent to the southwest end of Proposed Vineyard Block 2. The project has been designed to avoid this feature and provide it with a minimum 50-foot buffer: see **Exhibit A** Plan Sheets 1-3 and **Exhibits B-1** and **B-2**.

Additionally, during the original biological surveys a linear seasonal wetland feature was identified immediately south of Proposed Vineyard Block 3 that is situated within a man-made ditch intended to drain reservoir overflow (i.e. spillway) (**Exhibit B-1**). After further investigation it was found by the project biologist to be dominated by non-native herbaceous hydrophytes and determined to provide very little habitat value above that of the surrounding non-native grasslands. A reduced setback of 10 feet was identified by the project biologist to be appropriate as it would not compromise the integrity of the linear wetland feature. The project has been designed to provide this feature with a minimum 50-foot setback consistent with County Code.

As describe above the project has been designed to avoid all riparian areas/vegetation, streams and wetland and provide them with required minimum setbacks pursuant to NCC section 18.108.025 and .026 (General provisions – Intermittent/perennial streams and Wetlands), therefore there would be no impacts to wetlands or riparian habitat occur because of the proposed project. Additionally, the proposed project has also been designed to maintain or reduce existing soil loss (sedimentation) and hydrologic/runoff characteristics resulting in no net increase in soils loss or runoff as compared to existing conditions to further protect water quality and aquatic resources.

- d. The project site is not within either a Natural Landscape Block or an Essential Connectivity Area, and no wildlife nursery sites were identified in the project site(WRA, May 2024). Existing wildlife exclusion fencing already encompasses the project areas (see Figure 2 in **Exhibit A**). Only minor extensions to the existing fencing at the northern end of Vineyard Block 1 and eastern end of Vineyard Block 3 are proposed.

At the local level the project site provides minimal connectivity in the area because of the extensive agricultural development to the south, east and west dating back to at least the 1970's, in addition to Silverado Trail to the east, which has significantly limited wildlife movement in the area. The Napa River and associated riparian area provides north-south corridor functions in the area. The proposed project would maintain oak woodland and grassland between the various vineyard blocks allowing for continued wildlife movement and use in the immediate vicinity. For these reasons, in addition to implementation of **Mitigation Measure BIO-1** the proposed project is not anticipated to result in any potentially significant impacts to wildlife movement. Wildlife nursery sites were not identified in the project site, therefore there would be no impacts to wildlife nursery sites.

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

**Fencing – Conditions of Approval:**

The owner/permittee shall revise Erosion Control Plan #P24-00213-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 #P24-002123-ECPA, and include the following components:

- a. New fencing shall use a design that has 6-inch square gaps at the base (instead of the typical 3-inch by 6-inch rectangular openings) to allow small mammals to move through the fence.
  - b. Exit gates shall be installed at the corners of deer fencing to allow trapped wildlife to escape. Smooth wire instead of barbed wire shall be utilized to top wildlife exclusion fencing to prevent entanglement.
  - c. Any modifications to the location of wildlife exclusion fencing as specified in Erosion Control Plan #P24-00213-ECPA pursuant to the Vineyard Fencing Plan required by this condition shall be strictly prohibited and would require County review and approval to ensure the modified wildlife exclusion fencing location/plan would not result in potential impacts to wildlife movement.
- e. The project has a zoning designation of Agricultural Preserve (AP) and is therefore not subject to the vegetation retention requirements or vegetation removal mitigation required in Agricultural Watershed zoning designation Pursuant to NCC Section 18.108.020.C-E. However, the project is still subject to General Plan Conservation Element Policy CON-24 regarding oak woodland habitat.

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

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

The project site contains approximately 49.6-acres of oak woodland (coast live oak 43.7-acres, blue oak woodland 2.3-acres and valley oak woodland 3.6-acres), approximately 7-acres of which occur in the proposed development area ( $\pm 6.5$ -acres coast live oak woodland and  $\pm 0.5$ -acres blue oak woodland); therefore at least 14-acres of oak woodland would need to be preserved to comply with Policy CON 24.c. None of the holding's Valley oak woodland would be removed as part of the project. The project includes a proposed 18-acre *Tree Preservation Area* made up of the holding's oak woodlands as shown in Figure 5 of **Exhibit 1**. As proposed the project would comply with Policy CON 24.c.

However, while the Project has identified a preservation area consistent with County Code it does not include permeant preservation of these oak woodlands; therefore, it would be inconsistent County Policy resulting in a potentially significant cumulative impact. To reduce impacts on the oak woodland communities to a less-than-significant level and comply Policy CON-24c, **Mitigation Measure BIO-4** will be implemented. This measure will require the preservation of no less than 8-acres of oak woodland, which shall include the woodland areas removed as a result of **Mitigation Measure AES-1** and **Mitigation Measure BIO-1** as discussed in **Section VIII (Greenhouse Gas**

**Emissions**). This measure will also require the installation of construction fencing to avoid encroachment into avoided woodland areas and replacement provision for trees that are inadvertently removed as a result of the project.

It should be noted that due to implementation of **Mitigation Measures AES-1** and **BIO-1** oak woodland removal is reduced to 4-acres, as such to meet General Plan Policy CON-24c a minimum of 8-acres of oak woodland must be preserved; therefore, the proposed 18-acre preservation area can be reduced to a minimum of 8-acres and still comply with the 2:1 preservation ratio.

**Mitigation Measure BIO-4:** The owner or permittee, prior to approval, shall implement the following measures to minimize impacts to oak woodlands:

- a. Revise Figure 5 (Tree Preservation) and associated calculations of #P24-00213-ECPA to provide a Preservation Area, totaling no less than 8-acres of oak woodland of which at least 3.5-acres shall be developable (i.e. on slopes of 30% or less and located outside of aquatic resource setbacks) to be designated as such in a deed restriction or mitigation easement or other means of permanent protection acceptable to the County, that shall include oak woodlands avoided as a result of **Mitigation Measure AES-1** and **Mitigation Measure BIO-1**. The final configuration of the Preservation Area shall be submitted to Napa County for review and approval prior to incorporation into the ECPA. Land placed in protection shall be restricted from development and other uses that would degrade the quality of the habitat, including but not limited to conversion to other land uses such as agriculture or urban development and excessive off-road vehicle use that increases erosion, and should be otherwise restricted by the existing goals and policies of Napa County. The owner/permittee shall record the deed restriction or mitigation easement prior to construction or within 90 days of project approval, whichever comes first.
- b. Prior to any earthmoving activities, temporary fencing shall be placed at the edge of the dripline of trees to be retained that are located adjacent to the proposed development area (typically within approximately 50 feet of the proposed development area). The precise locations of said fences shall be inspected and approved by the Planning Division prior to the commencement of any earthmoving activities. No disturbance, including grading, placement of fill material, storage of equipment, etc. shall occur within the designated protection areas for the duration of erosion control plan and vineyard installation.
- c. The owner or permittee shall refrain from severely trimming the trees, typically no more than 1/3<sup>rd</sup> of the canopy, and vegetation to be retained adjacent to the proposed development area.
- d. In accordance with County Code Section 18.108.100 (Erosion hazard areas – Vegetation preservation and replacement) trees that are inadvertently removed that are not within the boundary of the project and/or not identified for removal as part of #P24-00213-ECPA shall be replaced on-site with fifteen-gallon trees at a ratio of 2:1 at locations approved by the planning director. A replacement plan shall be prepared for county review and approval that includes at a minimum, the locations where replacement trees will be planted, success criteria of at least 80%, and monitoring activities for the replacement trees. The replacement plan shall be implemented before vineyard planting activities. Any replaced trees shall be monitored for at least three years to ensure an 80% survival rate. Replacement trees shall be installed and documented that they are in good health prior to completion and finalization of the erosion control plan.

Additionally, with the implementation of **Mitigation Measures BIO-1** through **BIO-4** and the identified fencing condition of approval, the proposed project would have less-than-significant impacts on special-status wildlife as well as wildlife movement and result in conformance with policies protecting biological resources in the Napa County General Plan and Conservation Regulations.

- 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
<b>V. CULTURAL RESOURCES.</b> 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).

A Cultural Resource Reconnaissance of the project site was conducted by Flaherty Cultural Resource Service (May 6, 2024, contents confidential), which included a check of information on file with the regional office of the California Historical Resources Information System (CHRIS) and consultation with the Native American Heritage Commission for a search of the Sacred Lands File to determine presence or absence of previously recorded historic or prehistoric cultural resources; a check of relevant historic references to determine the potential for historic era archaeological deposits or structures; and a surface reconnaissance survey of all accessible parts of the proposed development area to locate any visible signs of potentially significant historic or prehistoric cultural deposits.

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

**Cultural Resources – Conditions of Approval:**

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

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

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

**Discussion**

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

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

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

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

With respect to transportation energy, existing energy standards are promulgated through the regulation of fuel refineries and products such as the Low Carbon Fuel Standard (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.<sup>13</sup> The proposed project would comply with these State requirements and the Air Quality conditions of approval presented in **Section III (Air Quality)**. Napa County has not implemented an energy action plan. Therefore, the proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency or impede progress towards achieving goals and targets, and impacts would be less than significant.

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

<sup>13</sup> California Code of Regulations, 2005. Title 13, Chapter 10, 2485, updated through 2014.

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

**Discussion**

- a. The project site could experience potentially strong ground shaking and other seismic related hazards based on the number of active faults in the San Francisco Bay region. The proposed project consists of earthmoving activities associated with the installation of erosion control measures for agricultural development but does not include the construction of new residences or other facilities (i.e., enclosed areas where people can congregate) that would be subject to seismic forces. Additionally, the proposed project would not result in a substantial increase in the number of people to the site. Therefore, the proposed project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving fault rupture, ground shaking, liquefaction, and landslides and impacts would be less than significant. Additional information supporting this conclusion is identified below.
- i) The project site is not located on an active fault or within an “Earthquake Fault Hazard Rupture Zone” designated by the Alquist-Priolo Earthquake Zoning Act. The nearest known faults are the West Napa Fault located approximately 1.2 miles west of the project site, and the Soda Creek Fault located approximately 2.3 miles east of the project site (Napa County GIS Fault layers, and [Fault Activity Map of California](#)). 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 to strong seismic ground shaking potential during an earthquake (California Geological Survey, 2016), the proposed project does not include construction of any new residences or enclosed areas where people would congregate. Therefore, the project would not contribute to an increased risk of loss, injury or death involving seismic ground shaking. This impact would be less than significant.
  - iii) The project site is not in an area subject to high liquefaction potential: the project site is located in an area mapped with a very low potential liquefaction potential (Napa County GIS Liquefaction layer, Napa County General Plan 2008 and 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 in the project area (Napa County GIS, Landslide layers, and RGH Consultants, November 2024 - **Exhibit D**). While the project geologist did identify small dormant/ancient landslides in the proximity of Vineyard Block 1 they determined that grading for vineyard development would not increase the risk of reactivation of these landslides because there would not be an increase in surface water runoff or create water flow paths toward these landslides (RGH Consultants, November 2024 - **Exhibit D**). Given the agricultural nature of the proposed project and the proposed erosion and runoff control measures, the proposed project would not directly or indirectly cause potential substantial adverse effects involving landslide potential; a less-than-significant impact would occur (also see Question c below for additional discussion).
- b. Soils in the proposed development area are predominately classified according to the Soil Survey of Napa County (USDA 1978) as Sobrante Loam (Soil Classification #179) and Forward Silt Loam (Soil Classification #139), two other soil types in the development area include Bale Clay Loam (Soil Classification #105) and Perkins Graveley Loam (Soil Classification #169)<sup>20</sup>. Installation and implementation of the proposed project would involve vegetation removal and earthmoving activities within the proposed development area. Pursuant to NCC Section 18.108.070(L) (Erosion Hazard Areas), earth-disturbing activities (other than installation of winterization measures) cannot be performed between October 15 and April 1. These activities would take place during the dry season when rainstorms are less likely, resulting in negligible erosion and sedimentation during project installation and operation.

Soil loss calculations were prepared using the Universal Soil Loss Equation (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 vineyard development and operation would primarily be controlled through cover crops with the following minimum vegetative cover densities: 75% for proposed Block 1C; 80% for proposed Blocks 1A, 2, 4, 5A and 5B; and 85% for proposed Blocks 1B, 3A and 3B as specified in the ECPA. Details of the proposed erosion control measures are provided in the Erosion Control Plan and Soil Loss modeling prepared by PPI Engineering (**Exhibit A** and **Exhibit C**). Vineyard cover crops provide the ability to entrap eroded soils onsite, thereby reducing soil loss and sedimentation potential.

Based on USLE modeling calculations prepared by PPI Engineering (August 2024 - **Exhibit C**), the proposed conversion of approximately 18.4 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 7**). Under existing conditions, the annual soil loss is anticipated to total 45.46 tons per year across the proposed

<sup>20</sup> There is approximately 0.25-acres of Bale Clay Loam (Soil Classification #105) located in the southern end of Vineyard Block 2, and Vineyard Block 1C totaling 0.7-acres contains Perkins Graveley Loam (Soil Classification #169).

development area depending on soil type, slope length, and gradient. Under proposed project conditions, annual soil loss is anticipated to total 28.65 tons per year, or a reduction of approximately 35% as compared to existing conditions.

**Table 7 – USLE Soil Loss Analysis**

Proposed Vineyard Block Transect	Pre-project Soil Loss (tons/year)	Post-project Soil Loss (tons/year)	Difference	Percent Change (approximate)
1A	11.55	8.08	-3.47	-30%
1B	7.77	4.20	-3.57	-46%
1C	0.70	0.66	-0.04	-6%
2	11.17	7.39	-3.78	-34%
3A	6.58	3.15	-3.43	-52%
3B	0.66	0.33	-0.33	-50%
4	3.63	2.50	-1.13	-31%
5A	1.78	1.22	-0.55	-31%
5B	1.64	1.13	-0.51	-31%
<b>Total<sup>1</sup></b>	<b>45.46</b>	<b>28.65</b>	<b>-16.81</b>	<b>-35%</b>

1. Individual estimates may not add to the exact totals identified due to rounding within the USLE model.

Source: PPI Engineering, August 8, 2024, Soil Loss Analysis – Exhibit C

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 waterbars, straw wattles, straw mulching, straw bale dikes, 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 (i.e., Hydromodification) Installation and Operation – Conditions of Approval:**

The following conditions shall be incorporated by reference into Erosion Control Plan #P24-00213-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 straw wattles the repair/reconstruction and maintenance of existing diversion ditches, insloped avenue and associated rock level spreader, subsurface drainage line and drop inlet, and permanent no-till cover crop (or adequate mulch cover), shall be installed no later than October 15 during the same year that initial vineyard development occurs. This requirement shall be clearly stated on the final Erosion Control Plan. Additionally, pursuant to NCC Section 18.108.135 “Oversight and Operation” the qualified professional that has prepared this erosion control plan (#P24-00213-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 80% for proposed Vineyard Blocks 1A, 2, 4, 5A and 5B, and 85% for Vineyard Blocks 1B, 3A and 3B. The cover crop may be cultivated after April 1 for the first three years of development and operation; after three years a permanent, no-till cover shall be established. Strip spraying is permitted within the vineyard blocks that require 80% or less vegetative cover provided that the overall vegetated cover meets the required cover detailed above. Blocks that require 85% or greater vegetative cover shall be spot sprayed only. 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 there are no landslide deposits mapped on the project site. 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 (RGH Consultants, November 2024 - **Exhibit D**) nor any increase in erosion associated with landslide processes. Therefore, the proposed project would not result in any significant impacts or 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). Furthermore, no structures are proposed as part of the project and expansive soils pose little risk to vineyards and related agricultural improvements. Therefore, there would be no impacts associated with expansive soils.
- e. The proposed project involves the development of a vineyard. No septic tanks or alternative wastewater disposal systems are needed or proposed for the proposed project. Therefore, no impact would occur regarding soils supporting septic tanks or alternative wastewater disposal systems.
- f. The proposed project would not destroy any unique geologic features on the project site. Due to the nature of the soils in the project site and the nature of the proposed project (which would involve a relatively shallow vineyard), the probability of encountering paleontological resources within the project site is minimal. Furthermore, project approval, if granted, would be subject to the standard conditions described below, that would avoid and reduce potential paleontological resource impacts. Therefore, impacts on geological 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
<b>VIII. GREENHOUSE GAS EMISSIONS.</b> 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 checked="" type="checkbox"/>	<input 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 (CO<sub>2</sub>), methane, nitrous oxide, and fluorocarbons. CO<sub>2</sub> 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, farm equipment and management activity emissions. CO<sub>2</sub> is used as the reference gas to calculate atmospheric carbon effects of GHGs. GHG emissions are reported as carbon dioxide

equivalent (CO<sub>2e</sub>) 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<sub>2e</sub> 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>).

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

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

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

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

"Carbon stock" refers to the total amount of carbon stored in the existing plant material including trunks, stems, branches, leaves, fruits, roots, dead plant material, downed trees, understory, and soil organic material. Carbon stock is expressed in units of metric tons of carbon per acre. When land is cleared, some percentage of the carbon stored is released back to the atmosphere as CO<sub>2</sub>.

"Carbon storage" refers to the carbon stocks held in the soil and vegetation. When land is altered or vegetation is removed, the carbon stored in plants and soil can be released back into the atmosphere as a one-time event. Similarly, adding vegetation to a site would increase carbon stock. Unlike sequestration, which is an active, recurring process, changes to carbon stock typically result in a one-time change of CO<sub>2</sub>, and not an ongoing loss or gain over time.

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

“Carbon sequestration” refers to the ongoing process by which plants, such as vines, trees, and grasses absorb CO<sub>2</sub> from the atmosphere through photosynthesis, converting it into carbon that is stored in their biomass (roots, stems, leaves) and soil. This process helps remove CO<sub>2</sub> 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 CO<sub>2</sub>-capturing benefit, potentially increasing the amount of CO<sub>2</sub> that remains in the atmosphere annually. A decrease in carbon sequestration is considered an increase in CO<sub>2</sub> emissions.

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

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

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

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

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

### **Construction Emissions:**

Construction emissions associated with vineyard development projects include emissions from fuel used in construction equipment and vehicle trips used to develop and prepare the development area and plant vineyard. As discussed in **Section III (Air Quality)**, three County Certified CEQA documents assessed and analyzed potential air quality and GHG emissions associated with vineyard development. Within those EIRs potential GHG emissions associated with construction equipment were calculated and disclosed. An estimation of potential construction equipment emissions per acre of vineyard development was derived using the highest emissions results of the three projects; the KJS EIR anticipated approximately 1,880 metric tons (MT) CO<sub>2e</sub> of construction emissions for a 156-acre vineyard development, resulting in approximately 19.2 MT CO<sub>2e</sub> of construction equipment emissions per acre of vineyard development.<sup>22</sup> Using this emission factor it is anticipated that Construction Equipment Emissions associated with the proposed project's 18.4 gross acres of vineyard development would be approximately 353.3 MT CO<sub>2e</sub> (18.4-acres multiplied by 19.24 MT CO<sub>2e</sub>). 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<sub>2e</sub> and therefore are less than significant.

### **Operational Emissions:**

Emissions associated with the ongoing operation of the vineyard include the use of equipment and vehicles to maintain and farm the vineyard, such as haul trucks, pick-up trucks, and worker vehicle trips. The three vineyard development project analyses referenced above also assessed ongoing vineyard operation emissions associated with vehicles and equipment. 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<sub>2e</sub> of operational emissions per year for a 116-acre vineyard, resulting in approximately 2.77 MT CO<sub>2e</sub> 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 18.4-acre agricultural development would be approximately 51.0 MT CO<sub>2e</sub> per year (18.4 multiplied by 2.77 MT CO<sub>2e</sub>). 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

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<sup>22</sup> 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.

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<sub>2e</sub> per year.

### **Emissions from Change in Vegetation<sup>23</sup>:**

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.

For emissions impact assessment associated with carbon stock emissions and sequestration associated with the projects' vegetation removal, the County compares the loss/removal of oak woodland and coniferous forest against the project's proposed avoidance and preservation of these two vegetation types to determine impact significance. Projects that avoid and preserve at a minimum an equal amount of developable<sup>24</sup> oak woodland and/or coniferous forest as the total amount of woodland and/or coniferous forest being removed, regardless of slopes they occur on, result in no net loss in sequestration or increases in emissions. This results in a less than significant impact. The oak woodland and coniferous forest vegetation types are utilized for this determination because they have the highest carbon stock and sequestration values. As noted above, the following emissions are based on all vegetation types affected by the project, not just oak woodland and/or coniferous forest.

Based on project vegetation and canopy mapping (Figure 5 **Exhibit A-1 Exhibit A-2** and **Exhibit B-1**) as proposed the project would remove up to 7-acres of oak woodland. The proposed 18-acre Tree Preservation Area (Figure 5, **Exhibit A**) contains approximately 2.7-acres of developable oak woodland. Because the proposed project is not retaining a 1:1 ratio of total oak woodland removed to developable oak woodland avoided and preserved as noted above, the County has elected to disclose and assess carbon stock and sequestration using the County's V-CESS Calculator.

Based on V-CESS Calculator inputs, the proposed project, which includes the avoidance of approximately 2.7-acres of developable oak woodland, 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 2,005.6 MT CO<sub>2e</sub> which exceeds the SMAQMD's construction threshold of 1,100 MT CO<sub>2e</sub>. These project output values/emissions consist of the following in MT CO<sub>2e</sub>: equipment emissions 354.1, carbon stock emission due to removal of existing vegetation 2,119.6, carbon sequestration annually due to vegetation removal -27.3, carbon stock sequestration due to proposed preservation -435.5 and annual carbon sequestration due to preservation -5.2.

Based on V-CESS Calculator inputs that incorporate project reductions resulting from implementation of **Mitigation Measure AES-1** and **Mitigation Measure BIO-1** resulting in the avoidance of approximately 2.5-acres of developable oak woodland, thereby reducing the project to 14.1 gross acres and approximately 10.3 net planted, and a woodland preservation area that includes a minimum of 3.5-acres of developable oak woodland, the 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 1,090.4 MT CO<sub>2e</sub> which is below the SMAQMD's construction threshold of 1,100 MT CO<sub>2e</sub>. These project output values/emissions consist of the following in MT CO<sub>2e</sub>: equipment emissions 271.3, carbon stock emission due to removal of existing vegetation 2,119.6, carbon sequestration annually due to vegetation removal -27.3, carbon stock sequestration due to preservation and mitigation -1,258.2 and annual carbon sequestration due to preservation and mitigation -15.0.

Specific to carbon sequestration under existing conditions, the project area currently emits up to -27.3 MT CO<sub>2e</sub> annually. This is due to the large amount of non-native grassland in the project area. As proposed with mitigation incorporated it is anticipated that annual sequestration would increase to 29.9 MT CO<sub>2e</sub> a year. Therefore, the project as proposed with implementation of **Mitigation Measure AES-1** and **Mitigation Measure BIO-1** 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.

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

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

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>IX. HAZARDS AND HAZARDOUS MATERIALS.</b> 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 would occur in an on-site storage facility/container located near the site's farm center, more specifically south of proposed Vineyard Block 1C (see **Figure #3 of Exhibit A**). Chemical mixing or cleaning and washing of chemical application equipment would occur at an existing wash pad located adjacent to the site's farm center, which is also south of proposed Vineyard Block 1C. Hazardous materials storage and cleaning are already occurring at these locations as part of the holding's past and current vineyard management activities.

Fertilizers would be distributed through the drip system up to three times a year. Other fertilizers (or soil amendments) such as compost and Gypsum are anticipated to be applied once a year. Herbicides (i.e., roundup, lifeline, or chareav) would be applied through spray for weed management up to four times a year.

Assembly Bill 2185 (1985) created the Business Plan Program, commonly known as the Hazardous Materials Business Plan (HMBP) or Community Right-to-Know Program (CalOES 2020). The program's purpose is to inform the public about the hazardous materials being handled at businesses in the community, inform emergency responders about which hazardous materials are handled at a facility, and train employees on handling releases or threatened releases of hazardous materials. An estimated 1,250 facilities in Napa County are subject to the HMBP program. The Napa County Division of Environmental Health began countywide implementation of this program in 1989. The division requires businesses to have an HMBP if they store hazardous materials at levels exceeding the minimum reportable quantities (a total weight of 500 pounds for solids, a total volume of 55 gallons for liquids, and 200 cubic feet for compressed gases). The HMBP consists of owner/operator information, an inventory of chemicals, and an emergency response plan and maps. The HMBP is reviewed by the Napa County Division of Environmental Health and kept on file with the Napa County Division of Environmental Health and

the California Environmental Reporting System (CERS). Current vineyard operations are covered by HMBP Digital Health Department (DHD<sup>25</sup>) CERS ID #10406419 with the Napa County Division of Environmental Health.

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).

The Napa River, a U.S. Geological Survey (USGS) blue-line stream, is generally coterminous with the holding's western and southern property lines, and Chase Creek, a blue-line tributary to the Napa River, generally runs through the eastern portion of the holding in a north south direction (see **Figure 1**). There are approximately seven (7) other minor ephemeral drainages located within the northern end of the project site. All but one of these ephemeral drainages are disconnected from the Napa River and Chase Creek. The ephemeral drainage located in the western side of the holding is connected to the Napa River, this drainage is located approximately 700 feet from the project area at its closest point. The plan has been designed to provide minimum 50-foot setbacks from ephemeral drainages and potential wetlands in accordance with NCC 18.108.025 (**Exhibit A**). Therefore, no waterways or ephemeral drainage 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 manufacturer's recommendations on use, storage and disposal of chemical products.
- b. Workers shall avoid overtopping fuel gas tanks and use automatic shutoff nozzles where available.
- c. During routine maintenance of equipment, properly contain and remove grease and oils.
- d. Discarded containers of fuel and other chemicals shall be properly disposed of.
- e. Spill containment features shall be installed at the project site wherever chemicals are stored overnight.
- f. All refueling, maintenance of vehicles and other equipment, handling of hazardous materials, and staging areas shall occur at least 100 feet from watercourses, existing groundwater well(s), and any other water resource to avoid the potential for risk of surface and groundwater contamination.
- g. To prevent the accidental discharge of fuel or other fluids associated with vehicles and other equipment, all workers shall be informed of the importance of preventing spills and of the appropriate measures to take should a spill occur.

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

- c. The closest schools, Sunrise Montessori of Napa Valley, La Sagrada Familia Catholic International Home School Academy, and Unidos Middle School are all located approximately 3.5 miles to the south of the project site (Napa County GIS, Schools Layer). There are no schools within 0.25 miles of the project site. Therefore, no impact would occur.
- d. The project site is not on any of the lists of hazardous waste sites enumerated under Government Code Section 65962.5 (Napa County GIS hazardous facility layer; GeoTracker, 2024). Therefore, no impact would occur.
- e. The project site is neither located within an area covered by an airport land use plan, nor is it within 2 miles of a public, public-use, or private airport (Napa County Airport Land-use Compatibility Plan, 1991, and Napa County GIS Airport Layer). The closest airports are the Napa Airport and Parrett field in Angwin, which are both over 10 miles from the project site. Therefore, no impact would occur.
- f. During construction, there would be negligible numbers of workers (up to 20 employees) visiting the project site on a temporary basis to implement the project and install vineyards. On the days when vineyard operations activities occur it is anticipated there would be between one to approximately five round trips for work crews of between two and 10 workers. Peak vineyard operational activities, which include pruning and harvest generate up to approximately 28 round trips per day for anticipated work crews of up to 40 employees. The applicant has also indicated that these workers already travel to and from the site to manage and maintain the existing vineyards in the holding, and that minimal new trips, if any, are anticipated to the project site as part of the project. Further It is anticipated that these workers are

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<sup>25</sup> The Digital Health Department (DHD) is the software that the Napa County Division of Environmental Health uses to administer the HMBP Program.

already conducting vineyard management and operations activities on the project site or may otherwise be employed by the owner/applicant and currently going to and from the project site because of the holding's +300-acres of existing vineyard or would come from the existing labor pool in the region.

No road closures would be required for the proposed project, and as noted above 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 Local Responsibility Area (LRA) that is designated as a Very High Fire Hazard Severity Zone. The site is not within a State Responsibility Area and therefore has no State Fire Hazard Severity Zone designation (CalFire, Fire Hazard Severity Zone 2022; Napa County GIS CalFire Layers, Fire Protection Responsibility Areas and Fire Hazard Severity Zones/WUI). 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 April through October, thereby reducing the fuel loads within the vineyard. The removal of vegetation and the management of the vineyard may result in an overall reduction of fuel loads within the project site as compared to existing conditions. Therefore, the proposed project would not increase the exposure of people or structures to wildland fires, and the impact would be less than significant.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>X. HYDROLOGY AND WATER QUALITY.</b> Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Discussion**

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

The proposed vineyard would be irrigated with a combination of recycled water provided by the Town of Yountville and existing water rights (**Exhibits E-1 and E-2**); the anticipated water demand for irrigation would be approximately 6.2 AF/year. Because the proposed project will not be irrigated with groundwater, a Water Availability Analysis (WAA) prepared in accordance with the County's WAA Guidelines, Napa County, 2015, is not necessary: that is no Tier 1, Tier 2 or Tier 3 WAA is needed.

The project site is located within the Chase Creek and Napa River Yountville Reach Drainages: only approximately 1.5-acres of the proposed development that is located along the western periphery of proposed Vineyard Block 1A are located in the Napa River Yountville Reach Drainage. The Napa River, a U.S. Geological Survey (USGS) blue-line stream, is generally coterminous with the holding's western and southern property lines, and Chase Creek, a blue-line tributary to the Napa River, generally runs through the eastern portion of the holding in a north-south direction: see **Figure 1**.

There are approximately seven (7) other minor ephemeral drainages located within the northern end of the project site. All but one of these ephemeral drainages are disconnected from the Napa River and Chase Creek. The ephemeral drainage located in the western side of the holding is connected to the Napa River, this drainage is located approximately 700 feet from the project area at its closest point. Drainage from the project site is characterized by surface sheet flow with runoff generally flowing toward the Napa River and Chase Creek.

A portion of the southern and southeastern ends of the holding, encompassing approximately 200-acres, are located in the Napa Valley Subbasin Groundwater Sustainability Agency (GSA) boundary, the remainder of the holding is not within the GSA.

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 (TMDL) for the Napa River (Order #R2-2009-0064), which 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"<sup>26</sup>; 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. The holding currently operates under the 'Robert Mondavi Winery – Wappo Hill Ranch' farm plan.

In the General Permit the San Francisco Bay Regional Water Board identified four significant sediment sources that are associated with vineyard properties: i) vineyard soil erosion; ii) offsite erosion caused by vineyard storm runoff increases; iii) road-related sediment delivery; and iv) 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 Board<sup>27</sup>.

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

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

<sup>27</sup> [https://www.waterboards.ca.gov/sanfranciscobay/water\\_issues/programs/agriculture/vineyard/](https://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/agriculture/vineyard/)

- 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 #P24-00213-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. Additionally, as disclosed above the holding is also operating under a certified farm plan (*Robert Mondavi Winery – Wappo Hill Ranch*), that has also decreased sediment production from the holding.

- b. The proposed vineyard would be irrigated with a combination of recycled water provided by the Town of Yountville and existing surface water rights as further described below (**Exhibits E-1** and **E-2**). Because the proposed project will not be irrigated with groundwater, a Water Availability Analysis (WAA) prepared in accordance with the County’s WAA Guidelines (Napa County, 2015) is not necessary (i.e. no Tier 1, Tier 2 or Tier 3 WAA is needed).

A water balance has been prepared by the applicant that indicates that the anticipated water demand to irrigate the proposed vineyard would be approximately 0.5 AF per acre of planted vineyard per year resulting in an anticipated water demand of 6.2 AF/yr for the proposed vineyard. There is approximately 295-acres of existing planted vineyard acreage within the holding with an anticipated use of 0.3 AF/acre per year, resulting in an approximate water demand of 88.5 AF/yr for the holding existing vineyards. Existing vineyard in conjunction with the proposed vineyard is anticipated to use 94.7 AF/yr. It should also be noted that once the proposed vineyard matures and is established (typically 3 to 5 years after planting) that anticipated water demand would likely reduce to ±0.3 AF/year consistent with existing vineyard water use in holding (PPI March 2025 – **Exhibit E-1**).

The property holds three Licensed Water Rights through the State Water Resources Control Board: #11278, #11852 and #12240. These licenses allow the owner/permittee to divert and store a total of 129 AF/year. The licenses also contain provisions to divert additional water each year to replenish water used early in the spring, which potentially adds 150 AF/year for a total of 279 acre-feet. of available water through the water rights. To provide a more conservative disclosure and assessment the project’s water balance utilizes the lower water allocation amount of 129 AF annually: License #11278 70 ac-ft/year, License #11852 40 ac-ft/year, and License #12240 19 AF/year. The four existing reservoirs within the holding have a total water storage capacity of 111 acre-feet: Reservoir A 18 ac-ft, Reservoir C 24 ac-ft, Reservoir D 31 AF, and Reservoir R 38 AF: see **Exhibit E-1**. The current recycled water agreement specifies a minimum annual allotment of 84 acre-feet., which brings total available water on the holding to 213 AF/year: see **Table 8**.

It should be noted that proposed Vineyard Blocks 4, 5A, and 5B are within the existing Water Rights allowed “Place of Use” (POU) and will be irrigated with a combination of surface water and recycled water: proposed Vineyard Blocks 1A, 1B, 1C, 2, 3A and 3B are located outside of the existing POU and will be irrigated with recycled water: **Exhibits E-1** and **E-2**.

**Table 8 – Water Availability/Supply, Storage and Use**

Water Availability in ac-ft/year				
Surface Water Rights		Yountville Recycled Water		Total Water Availability
License #11278	70	84		213.0
License #11852	40			
License #12240	19			
Water Storage in ac-ft/year				
Reservoir A: 18	Reservoir C: 24	Reservoir D: 31	Reservoir R: 38	Total Water Storage 111.0
Existing and Proposed Water Use in AF/yr				
Existing vineyards 88.5		Proposed Vineyards 6.2		Total Water Use 94.7

Source: PPI Engineering, March 2025, **Exhibit E-1**

Considering that proposed water use of the existing vineyards in conjunction with the proposed project, totaling 97.7 AF/year, would be less than the holding’s surface water right allocation of 129 ac-ft/year and storage of 111 ac-ft/year, and that there is up 84 ac-ft/year of recycled water available to support the project and existing vineyards, including those located outside of the water rights POU the additional ±6 acre-feet of water required for the proposed vineyard will easily be accommodated by the recycled water supply. Therefore, this is adequate water supply and storage for the project in conjunction with existing vineyard. Furthermore, given the proposed project will not utilize groundwater there would be no impacts to groundwater supplies, groundwater recharge, or local groundwater aquifer levels.

Additionally, the condition of approval below, if approved, will be implemented to ensure that groundwater is not utilized for the vineyard under #P24-00213-ECPA.

**Water Source – Conditions of Approval:**

- a. In the event that changed circumstances or significant new information provide substantial evidence that the water system referenced in the Erosion Control Plan #P24-00213-ECPA would affect the groundwater basin, the PBES Director is 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.
- b. 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 groundwater wells, imported water, recycled water, or new or existing ponds/reservoir(s) 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. Any new water source(s) in the holding for the vineyard under P23-00213-ECPA will require a new Water Balance or Water Availability Analysis be required for County review and approval of any new water source.
- c. Earthmoving activities have the potential to alter the natural pattern of surface runoff, which could lead to areas of concentrated runoff and/or increased erosion. The conversion of existing vegetation to vineyard would alter the composition of the existing land cover and infiltration rates, which could affect erosion and runoff. The proposed project does not propose any alteration to a stream, river, or drainage course, or include the creation of impervious surfaces that would concentrate runoff. Refer to **Exhibit F** (PPI Engineering, August 12, 2024) for details related to the following discussion.

Erosion control measures and plan features that are not anticipated to affect drainage patterns but would assist in minimizing the potential for increased erosion and water runoff include the installation of waterbars and straw wattles, and establishment of a no-till cover crop with vegetative cover density minimum of 75% for proposed Block 1C; 80% for proposed Blocks 1A, 2, 4, 5A and 5B; and 85% for proposed Blocks 1B, 3A and 3B, and the application of straw mulch cover on all disturbed areas as needed to achieve the required coverage. These features would slow and filter surface runoff water, thereby minimizing sediment, nutrients, and chemicals from leaving the project site and entering nearby aquatic resources.

Proposed erosion and runoff control features that have the potential to alter natural drainage patterns include the repair/reconstruction and maintenance of existing diversion ditches as necessary, an insloped avenue between Blocks A1 and A2 and associated rock level spreader at the south end of Block 1A, subsurface drainage line and associated drop inlet in Block 5A that would connect to an existing diversion ditch. These proposed erosion and runoff control measures are not anticipated to materially alter the existing topography or drainage patterns of the project site or development areas, or direct surface flows into other watersheds. As discussed in **Section VII (Geology and Soils)**, erosion control features in conjunction with the cover crop are anticipated to reduce soil loss by approximately 35% as compared to existing conditions.

The Hydrology Analysis prepared by PPI Engineering for the project (August 12, 2024 – **Exhibit F**) utilized the Natural Resource Conservation Service TR-20 method to compare the pre- and post-development peak stormwater runoff rates from the proposed development area for the 2-year, 10-year, 50-year, and 100-year, 24-hour design storms (**Table 9**). Eleven (11) project level watersheds (or drainages) were delineated in the hydrologic analysis. Watersheds 1A (7.2-acres) and 1B (14.2-acres) drain to existing drainage ditches which flow to existing inlets to the west of Blocks 1A and 1B. These inlets convey the water to drainage pipelines that eventually outlet to the Napa River. Watershed 1C (4.0-acres) flows to the same existing swale as Watershed 2A (4.1-acres), this swale flows into an existing inlet which then directs water into an existing vineyard drainage system. Watershed 2B (4.9 acres) drains into the adjacent reservoir. Both Watersheds 3A (6.8 acres) and 3B (1.- acres) flow into the existing reservoir overflow channel which then directs water to an existing inlet which is presumed to outlet to the existing channel along Silverado Trail. Watersheds 1D (6.7-acres), 2C (3.7-acres), and 5 (17.5-acres) drain east towards Silverado Trail through the existing vineyard. Watershed 4 (12.8-acres) drains to an existing inlet to the north of Block 4.

Based on the project's Hydrology Analysis Watersheds 1D, 2A, 2C, and 5 had no changes in runoff or the time of concentration (Tc) from pre- to post-project conditions. Watershed 2B was shown to have a slight decrease in Tc of 0.2 but the model shows no change of runoff and therefore the decrease is considered to be zero in this instance. Watersheds 1A, 1B, 1C, 3A, 3B, and 4 all exhibited a decrease in runoff from pre- to post-project conditions. While Watershed 1A was shown to have a slight decrease in Tc the reduction in runoff resulted in a net decrease. 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.

**Table 9 – Hydrologic Modeling Calculations (TR-20) Results: Runoff Rates**

Watershed	Peak Discharge Flow (cfs) by 24-hour Storm Event Frequency Return Interval (cubic feet/second)			
	2-year	10-year	50-year	100-year
<b>Watershed 1A</b>				
Pre-project conditions	1.88	4.29	7.03	8.25
Post-project conditions	1.74	4.09	6.08	8.01
Change (cfs)	-0.14	-0.20	-0.23	-0.24
<b>Watershed 1B</b>				
Pre-project conditions	3.64	8.36	13.76	16.15
Post-project conditions	3.22	7.69	12.86	15.17
Change (cfs)	-0.42	-0.67	-0.90	-0.98
<b>Watershed 1C</b>				
Pre-project conditions	1.13	2.51	4.06	4.75
Post-project conditions	1.05	2.39	3.93	4.61
Change (cfs)	-0.08	-0.12	-0.13	-0.14
<b>Watershed 1D</b>				
Pre-project conditions	1.36	3.44	5.90	7.01
Post-project conditions	1.36	3.44	5.90	7.01
Change (cfs)	0.0	0.0	0.0	0.0
<b>Watershed 2A</b>				
Pre-project conditions	0.78	2.03	3.53	4.20
Post-project conditions	0.78	2.03	3.53	4.20
Change (cfs)	0.0	0.0	0.0	0.0
<b>Watershed 2B</b>				
Pre-project conditions	0.91	2.39	4.15	4.95
Post-project conditions	0.91	2.39	4.15	4.95
Change (cfs)	0.0	0.0	0.0	0.0
<b>Watershed 2C</b>				
Pre-project conditions	0.14	0.88	1.93	2.42
Post-project conditions	0.14	0.88	1.93	2.42
Change (cfs)	0.0	0.0	0.0	0.0
<b>Watershed 3A</b>				
Pre-project conditions	1.25	3.30	5.75	6.85
Post-project conditions	1.14	3.12	5.53	6.62
Change (cfs)	-0.11	-0.18	-0.22	-0.23
<b>Watershed 3B</b>				
Pre-project conditions	0.33	0.78	1.29	1.52
Post-project conditions	0.31	0.74	1.25	1.48
Change (cfs)	-0.02	-0.04	-0.04	-0.04
<b>Watershed 4</b>				
Pre-project conditions	1.98	4.67	7.79	9.17
Post-project conditions	1.82	4.45	7.52	8.89
Change (cfs)	-0.16	-0.22	-0.27	-0.28
<b>Watershed 5</b>				
Pre-project conditions	2.63	6.81	11.80	14.06
Post-project conditions	2.63	6.81	11.80	14.06
Change (cfs)	0.0	0.0	0.0	0.0

Source: PPI Engineering, August 2024 -**Exhibit F**

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.<sup>28</sup>

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

- d. The development areas are not located within a Federal Emergency Management Agency (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, Tsunami Hazard areas, Flood hazard areas, and Dam levee inundation areas layers; and Napa County General Plan-Safety Element, 2023). Therefore, no impact would occur.
- e. The proposed project would not have an adverse impact on water quality because the ECPA has been designed to keep polluted runoff and sediment from leaving the project site. As discussed in **Section IX (Hazards and Hazardous Materials)**, the project proposes the use of potentially hazardous materials during implementation activities (i.e., oil, gasoline, and transmission fluids associated with construction equipment) and the application of chemicals (i.e., fertilizers) for ongoing vineyard maintenance. Only federal and/or California approved chemicals would be applied to the vineyard in strict compliance with applicable State and federal law. As discussed in **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 a decrease in time of runoff concentration in relation to existing conditions (as discussed in Question c above), the proposed cover crop and buffers would be able to effectively trap and filter sediments, thereby minimizing their entry into nearby water resources.

As discussed above and in **Section VII (Geology and Soils)**, the proposed project has been designed with site-specific temporary and permanent erosion and runoff control measures and features to prevent sediment, runoff, and pollutants from leaving the project site. As such, the proposed project is anticipated to reduce soil loss and sedimentation by approximately 16.81 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 Hazards and Hazardous Materials conditions of approval, all operational activities that include the use or handling of hazardous materials, such as but not limited to agricultural chemical storage and washing, portable restrooms, vehicular and equipment refueling/maintenance and storage areas, soil amendment storage and the like, shall occur at least 100 feet from groundwater wells, watercourses, streams and any other water resource to avoid the potential risk of surface and groundwater contamination, whether or not such activities have occurred within these areas prior to this ECPA approval.

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

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

**Discussion**

- a. The nearest established community is the Town of Yountville, located approximately 1 mile west-northwest of the project site. Surrounding areas predominately contain agricultural development and rural residential areas. Therefore, the proposed vineyard and subsequent vineyard operations are consistent with the on-site and surrounding land uses and would not physically divide an established community. No impact would occur.

- b. The project site is zoned as Agricultural Preserve (AP) and is designated as Agricultural Resource (AR) under the Napa County General Plan Land Use Element. Surrounding parcels are also zoned AP and designated AR. Agriculture including the development and operation of 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 16.81 tons per year and maintain runoff conditions as compared to existing conditions resulting in no overall increase in runoff volume or decrease in time of concentration.
- The proposed project is consistent with Policies CON-48 and CON-50c, which require pre-development sediment erosion conditions and runoff characteristics following development not be greater than predevelopment conditions. As discussed in **Section VII (Geology and Soils)** and **Section X (Hydrology and Water Quality)** the project as proposed would reduce soil loss, sedimentation, and reduce runoff characteristics as compared to existing conditions.
- The proposed project with implementation of **Mitigation Measures BIO-1 through BIO-4** is consistent with Policies CON-13, CON-16 and CON-17 which require discretionary projects consider and avoid impacts to fisheries, wildlife habitat, and special-status species through evaluation of biological resources, as well as the preservation and protection of sensitive biotic communities, and habitats of limited distribution and no net loss of sensitive biotic communities. A Biological Resources Survey Report was prepared for the proposed project (**Exhibits B-1 and B-2**). The project as proposed with implementation of **Mitigation Measures BIO-1 through BIO-4** would minimize potential direct, indirect, and cumulative impacts to special-status species and associated habitat occurring in the project site and immediate area. Furthermore, implementation of these measures would not affect the feasibility of the proposed project in that impacts to special-status species and their habitat can be minimized.
- With implementation of **Mitigation Measures BIO-1 through BIO-4**, the proposed project is consistent with Goals CON-2 and CON-3, which require the continued enhancement of existing levels of biodiversity and protection of special-status species and habitat, and the County Conservation Regulations through preservation of natural habitats and existing vegetation. With these measures and conditions, the proposed project would maintain levels of biodiversity and would avoid impacts to special-status plant and animal species.
- The proposed project is consistent with Policy CON-18, which encourages the reduction of impacts to habitat conservation and connectivity. Wildlife movement would not be impaired.
- With the implementation of **Mitigation Measure BIO-4**, the proposed project is consistent with Policy CON-24, which requires preservation of 2-acres of oak woodland for every 1-acre impacted.
- The project site does not contain wetlands within its boundaries and the proposed project is consistent with Policy CON-30, which encourages the avoidance of wetlands.
- The proposed project is consistent with Policies CON-48 and CON-50c, which require pre-development sediment erosion conditions and runoff characteristics following development to be no greater than pre-project conditions. As discussed in **Section VII (Geology and Soils)** and **Section X (Hydrology and Water Quality)**, with incorporation of the Permanent Erosion and Runoff Control Measures condition of approval, the proposed project would reduce soil loss and sedimentation and would not increase runoff.
- The proposed project with mitigation incorporated is consistent with Policy CON-65b. Due to the proposed project's scope and scale, its construction and operational GHG emissions, as disclosed in **Section VIII (Greenhouse Gas Emissions)**, are anticipated to be less than significant.
- The proposed project is consistent with Policy AG/LU-1, which states that agricultural and related activities are the primary land uses in Napa County, as the proposed project is vineyard development and would increase agriculture uses in the County.
- The proposed project is consistent with the General Plan land use designation of Agricultural Resource and is therefore consistent with Policy AG/LU-21.
- The proposed project with incorporation of **Mitigation Measure AES-1** would result in less than significant aesthetic impact and result in consistency with General Plan Policy CC-5.

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

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XII. MINERAL RESOURCES.</b> 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 resources of value to the region or state or within a known mineral resource recovery area (Napa County Baseline Date Report, Figure 2-2, 2-3 and Map 2-1, 2005; Napa County General Plan Map, December 2008; Special Report 205, Update of Mineral Land Classification, Aggregate Materials in the North San Francisco Bay Production-Consumption Region, Sonoma, Napa, Marin and Southwestern Solano Counties, California Geological Survey, 2013, California Department of Conservation, 2016). The nearest known mineral resources area in Napa County is the Napa Quarry, located approximately 10 miles south-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
<b>XIII. NOISE.</b> 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 within the within the southern end of the Napa Vally Floor approximately 1 mile east of Town of Yountville, which is dominated by existing vineyards and wineries: surrounding parcels are extensively used for agriculture (vineyard) and wineries interspersed with and rural residential uses and undeveloped grasslands and woodlands. The closest residences to the project site are 5581 and 5585 Silverado Trail which are approximately 60 feet from proposed Vineyard Blocks 4 and 5, the next closest residences are located over 0.25 miles to east of the project area. Additionally, within the central/west-central portion of the holding, located between ±600 and ±1,000 west of the project areas is the Mondavi Farmworker Housing Center (5589 Silverado Trail, APN 039-040-053, Lands of the Napa County Housing Authority).

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

**Table 10** 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 11** 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 – 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 11 – Estimated Distance to dBA Contours from Construction Activities<sup>1</sup>**

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

<sup>1</sup> 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 approximately 90 dBA at the nearest existing offsite residence.

Noise related to farming activities and equipment typically ranges from 75 dBA to 95 dBA, with an average of approximately 84 dBA (TOTH 1979 and Napa County Baseline Date Report, chapter 6, 2005). Noise sources associated with ongoing vineyard operation and maintenance include a variety of vehicles and equipment, such as track and rubber wheel farming tractors and equipment, which would occur on a temporary and seasonal basis. **Table 12** 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 12 – Estimated Distance to dBA Contours from Farming Activities<sup>1</sup>**

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

<sup>1</sup> 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 approximately 84 dBA at the closest existing offsite residence.

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

- a. The project site is neither located within an area covered by an airport land use plan, nor is it within 2 miles of a public, public-use, or private airport (Napa County GIS: Napa Airport Compatibility Zones and USGS Quad Layers). Therefore, no impact would occur.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XIV. POPULATION AND HOUSING.</b> 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 are already conducting vineyard management and operations activities on the project site or may otherwise employed by the owner/applicant and currently going to and from the project site because of the holding's +300-acres of existing vineyard or would come from the existing labor pool in the region. Further, within the central/west-central portion of the holding is the Mondavi Farmworker Housing Center (5589 Silverado Trail, APN 039-040-053, Lands of the Napa County Housing Authority) that may provide workers for the project and subsequent operations. Therefore, the proposed project would not induce unplanned population growth in the project vicinity or greater region, either directly or indirectly. No impact would occur.
- b. The proposed project would not displace any existing housing or people, and it does not involve the construction of new homes. Therefore, no impact would occur.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XV. PUBLIC SERVICES.</b> 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)**, the proposed project is not going to result in substantial population growth in the area. It is anticipated that workers associated with the proposed project are already employed by the holding's owner (or property/vineyard manager) and any temporary workers would come from the existing labor pool in the 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
<b>XVI. RECREATION.</b> 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
<b>XVII. TRANSPORTATION.</b> 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.

Existing improvements on the project site and holding include approximately 295 net (planted) acres of vineyard, an existing network of ranch roads and drainage improvements (diversion ditches, culverts and outfalls), four (4) water storage reservoirs and associated infrastructure (main water lines, pump and fill stations, and vineyard irrigation systems), and three (3) agricultural storage/accessory buildings that include a farm center, offices, and tractor/farm equipment storage and associate septic system(s). An existing private driveway from Silverado Trail that provides access to 5581, 5585 and 5589 Silverado Trail also provides access to the proposed development areas and the larger Constellation holding. Trucks and other vehicles would use County roads or State highways for short periods during construction and subsequent vineyard operation.

Conservatively, vineyard construction is anticipated to generate up to seven truck trips to deliver and remove construction equipment during the first two weeks of project construction and over the last two months of project construction and an estimated four round trips per day for anticipated work crews of up to 20 employees, six days per week.

Conservatively typical vineyard operations for both the existing vineyards in the holding and for the proposed vineyard 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. On the days when these activities occur it is anticipated there would be between one to approximately five round trips for work crews of between two and 10 workers. Peak vineyard operational activities which include pruning and harvest generate up to approximately 28 round trips per day for anticipated work crews of up to 40 employees, plus two grape haul truck trips per day during harvest according to the applicant. The applicant has also indicated that these workers already travel to and from the site to manage and maintain the existing vineyards in the holding as described above, and that minimal new trips, if any, to the project site are anticipated as part of the project.

Because the proposed project would be expected to generate up to approximately 7 daily round trips during construction and up to 28 daily round trips for peak operations and maintenance, is below the 110-trip threshold in the Office of Planning and Research guidelines and the County’s TIS Guidelines and VMT screening criteria, the project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). Impacts would be less than significant. Further, operational trips are not expected to substantially increase, if at all, because of the project due to the extensive amount of existing vineyard on the holding that are already generating these trips.

- c. The proposed project would use the existing private driveway off Silverado Trail for project development and operation as is currently being done. The proposed project does not include roadway improvements and/or modifications to the existing driveway or Silverado Trail or include any other design feature that would result in hazardous conditions due to a geometric design feature or incompatible uses. The installation of the vineyard is consistent with the allowed use of the project site and other properties zoned as Agricultural Preserve (AP) as well as agricultural uses in the area. Therefore, the potential for the creation of, or substantial increase in, hazards due to existing 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 28 vehicles) during harvest, which would occur over approximately 14 days. Current county ordinances do not require formal parking for agricultural projects. Parking at the existing farm center in the holding area and/or along existing and proposed vineyard avenues would satisfy parking demands of project installation and subsequent vineyard operations. Therefore, no parking impacts are anticipated.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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**XVIII. TRIBAL CULTURAL RESOURCES.** Would the project:

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

- |  |                          |                                     |                          |                          |
|--|--------------------------|-------------------------------------|--------------------------|--------------------------|
| a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or   | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

**Discussion**

Notice of the proposed project was sent via certified mail and email to the Mishewal Wappo Tribe of Alexander Valley, the Middletown Rancheria, and the Yocha Dehe Wintun Nation on August 28, 2024.

On August 29, 2024, the Middletown Rancheria responded that the project site is not within their area of concern and therefore the invitation for consultation was declined. The County acknowledged the response in a letter and email dated October 10, 2024, and closed the consultation invitation.

No response to the invitation was received from the Yocha Dehe Wintun Nation. On October 10, 2024, the County sent a consultation closure notice via email and the US Postal Service to the Yocha Dehe Wintun Nation.

No response to the invitation was received from the Mishewal Wappo Tribe, and on October 10, 2024, the County sent consultation closure notices via email and the US Postal Service to the Mishewal Wappo Tribe. On October 13, 2024, the County received an email from the Mishewal Wappo Tribe in response to the closure notice sent on October 10<sup>th</sup> requesting consultation. In an October 21, 2024, phone conversation with Scott Gabaldon of the Mishewal Wappo Tribe and follow up email the County agreed to incorporate tribal monitoring and cultural sensitivity training into the proposed project.

a-b. As discussed in **Section V (Cultural Resources)** the Cultural Resource Reconnaissance of the project site that was conducted by Flaherty Cultural Resource Service (May 6, 2024) did not identify any significant or potentially significant cultural resources in the proposed development areas.

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

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

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

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XIX. UTILITIES AND SERVICE SYSTEMS.</b> 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 new workers to the project site on a temporary basis during construction, and ongoing vineyard operation and maintenance would generate a minimal number of new workers to the project site, if any, on an ongoing basis. It is anticipated that these workers are already employed by the holding's owner (or property/vineyard manager) and any temporary 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 existing surface water and recycled water sources would provide irrigation water to the vineyard (see the Water Source conditions of approval in **Section X [Hydrology and Water Quality]**).

The proposed project also would include the installation of a limited number of temporary and permanent onsite storm water drainage features such as the repair/reconstruction and maintenance of existing diversion ditches as necessary, insloped avenue and associated rock level spreader, subsurface drainage line and associated drop inlet, a permanent no-till cover crop, and the application of straw mulch, which have been designed and specified to meet project-related storm water drainage needs. The effect of the proposed storm water drainage features is described in **Sections IV (Biological Resources), VII (Geology and Soils), and X (Hydrology and Water Quality)**. As discussed in the referenced sections, the environmental impacts of construction of these features, with incorporation of standard conditions identified in **Sections III (Air Quality), V (Cultural Resources), IX (Hazards and Hazardous Materials), and XVIII (Tribal Cultural Resources)** would result in a less-than-significant impact.

b. As disclosed and discussed in **Section X (Hydrology and Water Quality)** the water use associated with the existing vineyards in conjunction with the proposed project total approximately 97.7 AF/yr, which would be less than the holding's surface water right allocation of 129 ac-ft/year and storage of 111 AF/yr, and there is also up to 84 AF/yr of recycled water available to support the project and existing vineyards. Therefore, the proposed project would have an adequate water supply resulting in a less-than-significant impact.

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 to construct erosion control features such as rock-filled avenues or used on existing roads. 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. <b>WILDFIRE.</b> 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 in a Local Responsibility Area (LRA) that is designated as a Very High Fire Hazard Severity Zone. The site is not within a State Responsibility Area and therefore has no State Fire Hazard Severity Zone designation (CalFire, Fire Hazard Severity Zone 2022; Napa County GIS CalFire Layers, Fire Protection Responsibility Areas and Fire Hazard Severity Zones/WUI). The general topography in the vicinity of the project site consists of the relatively flat Napa Valley which surrounds Wappo Hill and the smaller knoll to the south, with foot slopes of the eastern mountains to the east. Average slopes in the proposed development area range from 10% to 34%, with an average slope of 23%; approximately 1.3-acres of the development area are located 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 and project areas. Therefore, the proposed project would not impact an adopted emergency response plan or emergency evacuation plan; no impact would occur. Refer to **Section IX (Hazards and Hazardous Materials)** for additional discussion related to emergency access.
- b-c. Project construction would require the use of vehicles and heavy equipment for grading and other activities, and these vehicles and equipment could spark and ignite flammable vegetation. During construction, the risk of igniting a fire would be low because vegetation would be cleared prior to developing the vineyard, and the risk would be temporary during project construction. The proposed project does not include any infrastructure that would exacerbate fire risk. Although the project site is in an area that historically has experienced wildfires, the proposed project would not exacerbate wildfire risk, and this impact would be less than significant.
- d. Although the proposed project would alter land cover, temporary and permanent erosion control measures would be implemented for the proposed project which would reduce the impact of stormwater runoff or drainage changes being discharged on or offsite and there would not be an increase in peak flow in the development area (see **Section X [Hydrology and Water Quality]**). Therefore, there are no structures or people that would be exposed to downslope or downstream flooding or landslides because of the proposed project, and the impact would be less than significant.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XXI. <b>MANDATORY FINDINGS OF SIGNIFICANCE.</b> 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.)
- 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?

**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 #P24-00213-ECPA, with the incorporation of identified mitigation measures and conditions of approval (should the proposed project be approved), would not have the potential to significantly degrade the quality of the environment. Habitat for special-status bird and bat species and foothill yellow-legged frog has been identified in the project site. Implementation of **Mitigation Measures BIO-1** through **BIO-4** would avoid potential impacts to special-status bat species, special-status bird species and protected bird species.

Approximately 1,200 feet of new wildlife exclusion fencing (i.e. deer fencing) is proposed (±350 feet at the north end of Block 1A and ±850 feet around Block 3A), that will connect to existing wildlife exclusion fencing located throughout the holding (see **Figure 2 of Exhibit A**). At the local level the project site provides minimal connectivity in the area because of the extensive agricultural development to the south, east and west dating back to at least the 1970’s, in addition to Silverado Trail to the east, which has significantly limited wildlife movement in the area. The Napa River and associated riparian area provides north-south corridor functions in the area. The proposed project would maintain oak woodland and grassland between the various vineyard blocks allowing for continued wildlife movement and use in the immediate vicinity. For these reasons, in addition to implementation of **Mitigation Measure BIO-1** the proposed project is not anticipated to result in any potentially significant impacts to wildlife movement.

The ECPA has been designed to provide setbacks from ephemeral streams well in excess of the 35-foot minimum pursuant to NCC 18.108.025(B)(1). The closest portion of an ephemeral stream to the project area is approximately 65 feet located at the northeast end of proposed Vineyard Block 2. The Napa River is located over 450 feet from the project area at its closest point (from Block 5 located at the southern extent of the project area), the next closest point is over 1,250 feet (from Block 1 at the western extent of the project area). The only riparian areas and vegetation within the holding are connected to the Napa River and associated Valley Oak Woodland (WRA, May 2024 – **Exhibit B-1**), which is between +450 to +1,250 feet from the project area. Therefore, impacts to streams and water quality are not anticipated.

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

Therefore, the proposed project as designed with the incorporation of **Mitigation Measures BIO-1** through **BIO-4**, **Mitigation Measure TCR-1**, and identified conditions of approval, would have a less-than-significant potential to degrade the quality of the environment or eliminate important examples of the major periods of California history or prehistory.

- b. The parcel is located within two local drainages, Chase Creek and the Napa River Yountville Reach. The vast majority of the proposed vineyard development, approximately 17-acres or 92%, is located within the Chase Creek Drainage, approximately 1.5-acres is located within the Napa River Yountville Reach Drainage.

The Chase Creek Drainage area contains approximately 2839.2-acres. In 1993, vineyard acreage within this drainage was approximately 979.6-acres, or 34.5% of the drainage. Since 1993, approximately 110.8-acres of additional vineyard (or 3.9% of the drainage) have been developed to vineyard, resulting in approximately 38.4% of the drainage (or approximately 1090.4-acres) containing vineyard, resulting in a approximate conversion rate of 5.3% since 1993.

The Napa River Yountville Reach Drainage contains approximately 2609.8-acres. In 1993, vineyard acreage within this drainage was approximately 1301.8-acres, or 49.9% of the drainage. Since 1993, approximately 88.1-acres of additional vineyard (or 3.4% of the drainage) have been developed to vineyard, resulting in approximately 53% of the drainage (or approximately 1389.9-acres) containing vineyard resulting in a approximate conversion rate of 4.6% since 1993.

It is estimated, based on evaluation of the County's GIS layer identifying Potentially Productive Soils within the Chase Creek Drainage, that there are approximately 372.6-acres (13% of the drainage) having the potential to be developed to vineyard. This, in conjunction with existing and approved vineyard development (approximately 1090.4-acres), results in a total potential build out of approximately 1463.0-acres or approximately 51.5% of the drainage. Within the Napa River Yountville Reach Drainage there are approximately 329.9-acres (12.6% of the drainage) having the potential to be developed to vineyard, and in conjunction with existing and approved vineyard development (approximately 1389.9-acres), results in a total potential build out of approximately 1719.9-acres or approximately 65.9% of the drainage. With respect to the 16.7-acres of vineyard approved under #P24-00028-ECPA (November 2025), of which approximately 16.5-acres occurs with the Chase Creek Drainage and approximately 0.2-acres occurs in the Napa River Yountville Reach Drainage, its approval would not inherently increase the potential buildouts in the drainages, in that it has been accounted for in the under the GIS Potentially Productive Soils layer.

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

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

Over the past 32 years within the Chase Creek Drainage approximately 34.6-acres of vineyard was developed or approved per year (1,106.9 divided by 32: this includes the 16.5-acres approved under #P24-00028-ECPA located in this drainage). The #P24-00028-ECPA environmental document identified and disclosed that approximately 35.2-acres of vineyard were developed or approved per year, which will be utilized for the following calculation as it is more constative. 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 105.6 to 176.0-acres over the next three to five years within the Chase Creek Drainage are considered reasonable estimates.

Over the past 32 years within the Napa River Yountville Reach Drainage, approximately 43.4-acres of vineyard was developed or approved per year (1,390.1 divided by 32: this includes the 0.2-acres approved under #P24-00028-ECPA in this drainage). The #P24-00028-ECPA environmental document identified and disclosed that approximately 44.9-acres of vineyard were developed or approved per year, which will be utilized for the following calculation as it is more constative. 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 134.7 to 224.5-acres over the next three to five years within the Napa River Yountville Reach Drainage are considered reasonable estimates.

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

#### **Aesthetics – Section I:**

With the implementation of **Mitigation Measure AES-1**, the potential contribution to aesthetic impacts associated with the proposed project are considered to be less than cumulatively considerable and consistent with General Plan Policy CC-5.

#### **Air Quality and GHG – Sections III and VIII:**

The proposed project (#P24-00213-ECPA) includes the removal of vegetation and installation of vineyard and erosion control measures concurrent with other projects in the San Francisco Bay Area Air Basin that would generate emissions of criteria pollutants, including suspended PM and equipment exhaust emissions. As discussed in **Section III (Air Quality)** and shown in **Table 5** (Emissions from Vineyard Development and Operation) criteria pollutant emissions associated with development and operations are anticipated to be well below identified thresholds and therefore are not expected to result in project or cumulatively significant impacts. Additionally, the proposed project would be subject to standard air quality conditions of approval (should the proposed project be approved) that requires implementation of Air Quality BMPs to further reduce potential less-than-significant air quality effects of the proposed project and ongoing operation.

Based on information disclosed and assessed in **Section VIII (Greenhouse Gas Emissions)**, the project's equipment related construction and operational emissions would be below the SMAQMD GHG emissions thresholds of 1,100 MT CO<sub>2</sub>e for construction and 1,100 MT CO<sub>2</sub>e/year for operations and therefore can be considered less than significant. Potential contributions to air quality impacts associated with the proposed project, including GHG emissions and loss of sequestration, would be considered less than cumulatively significant through project scope and scale, and implementation of **Mitigation Measure BIO-4** and standard conditions of approval.

With respect to vegetation removal and sequestration loss/gain, as disclosed and assessed in **Section VIII (Greenhouse Gas Emissions)**, the proposed project with incorporation of **Mitigation Measures AES-1, BIO-1 and BIO-4** is estimated to result in one-time carbon stock emissions of 1,090.4 MT CO<sub>2</sub>e, which is below the SMAQMD's construction threshold of 1,100 MT CO<sub>2</sub>e. These project output values/emissions consist of the following in MT CO<sub>2</sub>e: equipment emissions 271.3, carbon stock emission due to removal of existing vegetation 2,119.6, carbon sequestration annually due to vegetation removal -27.3, carbon stock sequestration due to preservation and mitigation -1,258.2 and annual carbon sequestration due to preservation and mitigation -15.0.

Specific to carbon sequestration under existing conditions, the project area currently emits up to -27.3 MT CO<sub>2</sub>e annually.: This is due to the large amount of non-native grassland in the project area. As proposed with mitigation incorporated it is anticipated that annual sequestration would increase to 29.9 MT CO<sub>2</sub>e a year, resulting in no net loss of sequestration.

#### **Biological Resources – Section IV:**

Project-specific biological resources reconnaissance surveys (Wildlife Research Associates, May 2024 and February 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 because of the proposed project. The surveys included database records searches to identify the presence or potential presence of special-status species within the respective project sites. The database records searches included the USFWS, CNDDDB and CNPS databases.

There are also two vineyard ECPA projects on neighboring parcels to the north of the project site: the Disiree Inc., Vineyard Project (#P24-00213-ECPA, approved November 2025, SCH #2025091119) and The Realm Vineyard Project (#P24-00248-ECPA, pending). Project-specific biological resources reconnaissance surveys were performed for each of these projects, Wildlife Research Associates, December 2023 and 2024; Kjeldsen Biological Consulting, June 2024 (respectively) to evaluate potential habitat loss and disturbance to plant and wildlife species. The surveys included database records searches to identify the presence or potential presence of special-status species within the respective project sites. The database records searches included the USFWS, CNDDDB and CNPS databases.

As discussed in **Section IV (Biological Resources)**, no special-status plant or animal species were identified in the proposed development area. With incorporation of **Mitigation Measures BIO-1 through BIO-4**, special-status and protected birds and bats and associated habitat would be protected or avoided. Similarly, no special-status plant or animal species were identified in the biological surveys conducted for the Disiree Vineyard Project or The Realm Vineyard Project. Additionally, both of those projects would be responsible for implementing mitigation measures in conformance with policies protecting biological resources in the Napa County General Plan and Conservation Regulations CON-3, CON-13, and CON-17.

Streams, ephemeral drainages, and potential wetlands within the project site have been avoided and provided with setbacks that meet or are in excess of regulatory requirements and therefore not be affected by the proposed project. The project sites for the Disiree Vineyard Project and The Realm Vineyard Project both contain ephemeral streams and those projects would include setbacks in accordance with NCC 18.108.025.

The project site contains approximately 46-acres of coast live oak and blue oak woodland, with 7-acres within the proposed development area. Napa County General Plan Conservation Element Policy CON-24 requires that oak woodland be maintained to the extent feasible to provide oak woodland and wildlife habitat, slope stabilization, soil protection and species diversity. Policy CON-24c specifically calls for the preservation of oak woodland (on an acreage basis) at a 2:1 ratio. With the implementation of **Mitigation Measure BIO-4**, a minimum of 14-acres of oak woodland would be preserved for 7-acres impacted.

The Disiree Vineyard Project and This Relam Vineyard Project would also be required to conform with Napa County General Plan Conservation Element Policy CON-24 to ensure that oak woodland be maintained to the extent feasible and preserved (on an acreage basis) at a 2:1 ratio. The Disiree Vineyard project site contains approximately 44.4-acres of oak woodland with approximately 13.3-acres in approved vineyard blocks. The Disiree Vineyard Project will be required through mitigation to permanently preserve at approximately 26.6-acres of oak woodland, which would meet the 2:1 requirement. The This Realm Vinyard project site contains approximately 44.4-acres of oak woodland with approximately 13.3-acres proposed for removal. The Realm Vinyard Project would retain 31.1-acres of oak woodland, which would also exceed the 2:1 requirement. For these reasons, the proposed vineyard projects would be in conformance with Napa County General Plan Conservation Element Policy CON-24.

As discussed in **Section IV (Biological Resources)**, Wappo Hill is essentially an island of habitat consisting of mixed woodlands and grassland, interspersed with smaller vineyard developments within the larger Napa Valley that is dominated by vineyard encircling the Wappo Hill area. At the local level the project site and surrounding area provide minimal connectivity in the larger area because of the

extensive agricultural development to the south, east and west dating back to at least the 1970's, in addition to Silverado Trail to the east, which has significantly limited wildlife movement in the area. The Napa River and associated riparian area provides north-south corridor functions in the area. Approximately 1,200 feet of new wildlife exclusion fencing (i.e. deer fencing) is proposed ( $\pm 350$  feet at the north end of Block 1A and  $\pm 850$  feet around Block 3A), that will connect to existing wildlife exclusion fencing located throughout the holding (see **Figure 2 of Exhibit A**). The new fencing would not result in significant impacts to wildlife movement and use. 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 proposed project would be required to implement standard fencing conditions of approval. The Disiree Vineyard Project and This Realm Vineyard Project would also include the installation of new wildlife exclusion fencing and would be required to implement standard fencing conditions of approval to avoid impacts to wildlife corridors. As with the proposed project, most of the project sites would remain undeveloped, including the majority of the site's oak woodlands, in addition to grassland areas. The remnant woodlands with implementation of mitigation would retain connections between similar habitats within the project site as well as between neighboring properties. For these reasons, the proposed vineyard projects would be in conformance with Napa County General Plan Conservation Element Policy CON-18 and 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 survey (Flaherty Cultural Resource Services, May 2024) did not identify any significant or potentially significant cultural or Tribal cultural resources in the proposed development area. With the incorporation of standard conditions to protect cultural resources that may be discovered accidentally and implementation of **Mitigation Measure TCR-1**, significant impacts to cultural and Tribal Cultural resources are not expected (see **Section V [Cultural Resources]** and **Section XVII [Tribal Cultural Resources]**); therefore, the proposed vineyard development project would have a less than significant project-specific and cumulative impact on cultural and Tribal cultural resources. The Disiree Vineyard Project and The Relam Vineyard Project Cultural Resource Reconnaissance surveys (Flaherty Cultural Resource Services, October 2021, and Tom Origer & Associates, March 2023: respectively) also did not identify any significant or potentially significant cultural or Tribal Cultural resources and these project would be subject to standard conditions and mitigation to protect cultural and Tribal Cultural resources, resulting in less than significant impacts.

#### **Geology and Soils – Section VII:**

Soil loss and associated sedimentation resulting from implementation of the proposed project is anticipated to be reduced by approximately 16.81 tons/year as compared to existing conditions (**Table 7**). The reasons for this reduction are due to the increased vegetative cover conditions within the proposed vineyard development areas and the installation of erosion control features which reduce soil loss potential. Because the proposed project would reduce soil loss as compared to existing conditions and would be subject to erosion and runoff control conditions of approval, the proposed project is not anticipated to contribute cumulatively to sediment production within the Napa River watershed. Therefore, impacts associated with soil loss and associated sedimentation are not considered cumulatively significant.

Because geologic impacts associated with future agricultural projects would receive the same scrutiny under CEQA and the County's General Plan Goals and Policies, in particular General Plan Conservation Element Policy CON-48, which requires development projects to result in no net increase in sediment erosion conditions and soil loss as compared to existing conditions, it is not unreasonable to anticipate that those projects (including the Disiree Vineyard Project and The Relam Vineyard Project) 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:**

The proposed vineyard would be irrigated with a combination of recycled water provided by the Town of Yountville and existing water rights (**Exhibits E-1 and E-2**). Therefore, the proposed project would not impact groundwater supplies, groundwater recharge, or local groundwater aquifer levels. The Disiree Vineyard Project and The Relam Vineyard Project are subject to Water Availability Analysis (WAA) prepared in accordance with the County's WAA Guidelines (Napa County, 2015) because they rely on groundwater, which have or will disclose and assess annual water use of the proposed projects and groundwater recharge to ensure that water use is below the anticipated annual groundwater recharge rate for the project areas so that significant impacts to groundwater supplies, groundwater recharge, or local groundwater aquifer levels do not occur.

As discussed in **Section X (Hydrology and Water Quality)** a Hydrology Report was prepared by PPI Engineering (August 2024 – **Exhibit F**). Because the proposed project does not include new diversions, create concentrated flows, or otherwise materially alter site drainage patterns or project site slopes, no net increase in runoff volumes or time of concentration are expected as compared to pre-project

conditions with the installation and maintenance of the proposed project (**Exhibit A**). 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.

Furthermore, because hydrologic impacts associated with current or future agricultural projects (including the Disiree Vineyard Project and The Relam Vineyard Project ) 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. Further, current or future agricultural projects (including the Disiree Vineyard Project and The Relam Vineyard Project) would receive the same scrutiny under CEQA and General Plan conformance; therefore, those projects would also be anticipated to have a less-than-significant impacts associated with land use and planning.

#### **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: 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 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 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 Preserve zoning district. Therefore, less-than-significant impacts on human beings are anticipated.

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