

PUBLIC REVIEW DRAFT

**INITIAL STUDY/
MITIGATED NEGATIVE DECLARATION**

**1030 KAISER ROAD PROJECT
NAPA, CALIFORNIA**



LSA

August 2026

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MITIGATED NEGATIVE DECLARATION**

**1030 KAISER ROAD PROJECT
NAPA, CALIFORNIA**

Submitted to:

City of Napa
Community Resources & Development Department
Planning Division
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Napa, California 94559

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Project No. 20252510.00



August 2026

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LIST OF ABBREVIATIONS AND ACRONYMS

$\mu\text{g}/\text{m}^3$	micrograms per cubic meter
AB	Assembly Bill
ABAG	Association of Bay Area Governments
ADT	average daily traffic
AFY	acre-feet per year
Air District	Bay Area Air District
ALUCP	Napa Countywide Airport Land Use Compatibility Plan
amsl	above mean sea level
APN	Assessor's Parcel Numbers
APSA	Aboveground Petroleum Act
Basin Plan	Water Quality Control Plan
Bay Area	San Francisco Bay Area
BASMAA	Bay Area Stormwater Management Agencies Association
BASMAA Post-Construction Manual	<i>Bay Area Stormwater Management Agencies Association Post-Construction Manual</i>
BER	Business Environmental Risk
bgs	below ground surface
BMPs	Best Management Practices
BRA	Biological Resources Assessment
BUG	B = Backlight, U = Uplight, and G = Glare
CAL FIRE	California Department of Forestry and Fire Protection
CAL-ARP	California Accidental Release Prevention Program
Cal/OSHA	California Division of Occupational Safety and Health
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CALGreen Code	California Green Building Standards Code
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CASQA	California Stormwater Quality Association
CBC	California Building Code

CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERS	California Environmental Reporting System
CFC	California Fire Code
CGP	Construction General Permit
CGS	California Geological Survey
CH ₄	methane
CHRIS	California Historic Resources Inventory System
City	City of Napa
Clean Air Plan	Bay Area Air District's 2017 Clean Air Plan
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO ₂	carbon dioxide
CPT	Cone Penetration Testing
CREC	Controlled Recognized Environmental Conditions
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
cy	cubic yards
dB	decibel
dBA	A-weighted decibel
DCV	design capturer volume
DDT	dichlorodiphenyltrichloroethane
DEH	Napa County Department of Environmental Health
DOC	California Department of Conservation
DOSD	Division of Safety of Dams
DPM	diesel particulate matter
DTSC	California Department of Toxic Substances Control
EIR	Environmental Impact Report
EMFAC2021	EMission FACTor model, Version 1.0.2

EOC	Emergency Operations Center
EOP	Emergency Operations Plan
EPA	United States Environmental Protection Agency
ESFR	Early Suppression Fast Response
EV	electric vehicle
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FIRM	Flood Insurance Rate Map
FTA	Federal Transit Administration
FTA Manual	FTA's <i>Transit Noise and Vibration Impact Assessment Manual</i>
General Plan EIR	Napa 2040 General Plan Environmental Impact Report
GHG	greenhouse gas
GWP	global warming potential
HASP	Health and Safety Plan
HCP/NCCP	Habitat Conservation Plan/Natural Community Conservation Plan
HFCs	hydrofluorocarbons
HMBP	Hazardous Materials Business Plan
HRA	health risk assessment
HREC	Historical Recognized Environmental Conditions
HVAC	heating, ventilation, and air conditioning
IL	Light Industrial Zoning District
in/sec	inches per second
IS/MND	Initial Study/Mitigated Negative Declaration
ITE	Institute of Transportation Engineers
kWh	kilowatt-hours
L _{dn}	day-night average noise level
LED	light-emitting diode
LEED	Leadership in Energy and Environmental Design
L _{eq}	equivalent continuous sound level
LID	Low Impact Development
L _{max}	maximum instantaneous noise level

LRA	local responsibility area
MEI	maximally exposed individual
mgd	million gallons per day
MLD	Most Likely Descendant
MMI	Modified Mercalli Intensity
MND	Mitigated Negative Declaration
MOU	Memorandum of Understanding
mpg	miles per gallon
MRP	Municipal Regional Permit
MRZ	Mineral Resource Zone
MS4	Storm Water Discharges for Small Municipal Separate Storm Sewer Systems (MS4s)
MTC	Metropolitan Transportation Commission
NAHC	Native American Heritage Commission
NapaSan	Napa Sanitation District
NCSPPP	Napa Countywide Stormwater Pollution Prevention Program
NFD	Napa Fire Department
NFPA	National Fire Protection Association
NO ₂	nitrogen dioxide
NO _x	nitrogen oxide
N ₂ O	nitrous oxide
NPD	Napa Police Department
NPDES	National Pollutant Discharge Elimination System
NVTA	Napa Valley Transportation Authority
NVUSD	Napa Valley Unified School District
NWIC	Northwest Information Center
OSHA	Occupational Safety and Health Administration
Pb	lead
PCBs	polychlorinated biphenyls
PFCs	perfluorocarbons
PG&E	Pacific Gas and Electric Company

Phase I ESA	Phase I Environmental Site Assessment
PM _{2.5}	particulate matter less than 2.5 microns in size
PM ₁₀	particulate matter less than 10 microns in size
POTWS	publicly owned treatment works
PPV	peak particle velocity
PRC	Public Resources Code
Proposed Project	1030 Kaiser Road Project
Project Sponsor	Jaeger McHugh and Company, Inc
PV	photovoltaic
RCRA	Resource Conservation and Recovery Act
REC	recognized environmental condition
RMP	Risk Management Plan
RMS	root-mean-square
ROG	reactive organic gases
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCP	Stormwater Control Plan
SF ₆	sulfur hexafluoride
SGMA	Sustainable Groundwater Management Act
SLF	Sacred Lands File
SMARA	Surface Mining and Reclamation Act
SOI	Secretary of the Interior
SO ₂	sulfur dioxide
SR	Special Report
SRA	State Responsibility Area
SR-12	State Route 12
SR-29	State Route 29
SR-221	State Route 221
SWHA	Swainson's hawk
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board

TACs	toxic air contaminants
TAZ	traffic analysis zone
TCR	tribal cultural resources
TMDL	Total Maximum Daily Load
USDOT	United States Department of Transportation
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UST	Underground Storage Tank
UWMP	Urban Water Management Plan
VdB	velocity in decibels
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	vehicle miles traveled
VOC	volatile organic compound
Water Board	San Francisco Bay Regional Water Quality Control Board
WEAP	Worker Environmental Awareness Program

1.0 PROJECT INFORMATION

The following describes the proposed 1030 Kaiser Road Project (Proposed Project) that is the subject of this Initial Study/Mitigated Negative Declaration (IS/MND) prepared pursuant to the California Environmental Quality Act (CEQA). An overview of the Project Site location and existing characteristics is followed by a description of the proposed development and a summary of requested approvals and entitlements. The Proposed Project would result in the construction of a 153,380-square-foot, multi-tenant light-industrial building on a currently undeveloped 10.21-acre site located at 1030 Kaiser Road in Napa, California. The City of Napa (City) is the lead agency under CEQA for the Proposed Project.

1. Project Title:

1030 Kaiser Road Project

2. Lead Agency Name and Address:

City of Napa
1600 First Street
Napa, CA 94559

3. Contact Person and Phone Number:

Angela Alvarez-Cendejas
Associate Planner
(707) 257-9639

4. Project Location:

The 10.21-acre Project Site is located at 1030 Kaiser Road (Assessor's Parcel Number [APN] 046-370-004-000), at the northwest corner of the intersection of Kaiser Road and Syar Way in the City of Napa, Napa County, California.

5. Project Sponsor's Name and Address:

Michael Jaeger
Jaeger McHugh & Company, Inc.
1 Blackfield Drive, Suite 101
Tiburon, CA 94920

6. General Plan Designation:

Light Industrial

7. Zoning:

Light Industrial (IL), Floodplain Management Overlay (:FP), Airport Compatibility Overlay (:AC)

8. Description of Project:

The Proposed Project includes the construction of a 153,380-square-foot, flexibly designed, multi-tenant light-industrial building at the Project Site. The building would include

approximately 23,007 square feet of office space and 130,373 square feet of warehouse space. The Proposed Project would also include approximately 242 parking spaces for employees and visitors. The Project Site would be accessed by one (1) driveway on Kaiser Road and three (3) driveways on Syar Way.

9. Surrounding Land Uses and Setting:

The Project Site lies within Napa's industrial corridor along and adjacent to Napa Valley Corporate Drive, at the northwest intersection of Kaiser Road and Syar Way, and is currently undeveloped. The Project Site is bounded by industrial uses to the north, east, southeast, and west, and mixed-use development, including residential uses to the south of the Project Site across Kaiser Road.

10. Other Public Agencies Whose Approval is Required (e.g., permits, financial approval, or participation agreements):

A number of permits and approvals would be required to allow for the development of the Proposed Project. As the lead agency for consideration of the project, the City of Napa would be responsible for the majority of the approvals required for project development. Other agencies may also have authority over the Proposed Project and its approvals. A list of external agencies whose approval may be required for the Proposed Project is provided below:

- San Francisco Bay Regional Water Quality Control (RWQCB)
- Napa Sanitation District (NapaSan)

See Section 2.3: Permits and Approvals for a list of required permits and approvals.

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

A request form describing the Proposed Project and a map depicting the Project Site were sent to the Native American Heritage Commission (NAHC) on August 8, 2025, requesting a list of tribes eligible to consult with the City of Napa, pursuant to Public Resources Code Section 21080.3.1. On August 11, 2025, the NAHC responded in a letter with a list of tribal contacts. The City sent letters to these tribes on November 20, 2025, notifying them of their opportunity to consult for the Proposed Project. A summary of tribal consultation efforts is provided in Section 4.18, Tribal Cultural Resources, of this IS/MND.

2.0 PROJECT DESCRIPTION

This chapter describes the proposed 1030 Kaiser Road Project (Proposed Project) submitted by Jaeger McHugh and Company, Inc. (the Project Sponsor) that is the subject of this Initial Study/Mitigated Negative Declaration (IS/MND), which is being prepared pursuant to the California Environmental Quality Act (CEQA). The Proposed Project would result in the construction of a 153,380-square-foot, multi-tenant light industrial building on a currently undeveloped 10.21-acre site located at 1030 Kaiser Road in the City of Napa (City).

2.1 PROJECT SITE

The following describes the project's local and regional context, existing site characteristics, and surrounding land uses.

2.1.1 Project Site Location and Access

The 10.21-acre Project Site is located at 1030 Kaiser Road (Assessor's Parcel Number [APN] 046-370-004-000), at the northwest corner of Kaiser Road and Syar Way in the City of Napa, Napa County, California. The City is located approximately 35 miles north/northeast of the City of San Francisco and is bifurcated by the Napa River. The Project Site is a currently undeveloped 10.21-acre parcel and is located within the City's established industrial corridor. The Project Site is bounded by industrial uses to the north, east, southeast, and west, and mixed-use development, including residential uses, to the south of the Site across Kaiser Road. The City of Napa's City limits border the Project Site to the north and west. Regional vehicular access to the Project Site is provided by State Route 221 (SR-221) and State Route 12 (SR-12), with connections to State Route 29 (SR-29) and the North Bay freight network. Kaiser Road provides a direct connection to SR-221, east of the Project Site. Direct vehicle site access to the Project Site is provided by Syar Way. **Figure 2-1: Project Location and Vicinity** shows the regional and local context of the Project Site, and **Figure 2-2: Aerial Photograph of the Project Site and Surrounding Land Uses** depicts an aerial photograph of the Project Site and surrounding land uses.

2.1.2 Existing Site Conditions

The Project Site is an undeveloped 10.21-acre parcel at 1030 Kaiser Road located within the City of Napa's established industrial corridor, which runs along and adjacent to Kaiser Road and Napa Valley Corporate Drive. The Project Site's ground surface ranges from approximately 12 to 23 feet in elevation and is generally flat with soil stockpiles and ruderal vegetation present throughout, as well as 105 mature trees. There is an existing sidewalk along the southern boundary of the Project Site, which includes pedestrian street lighting. A chain-link fence runs along the western boundary of the Project Site, separating it from an industrial site immediately to the west.

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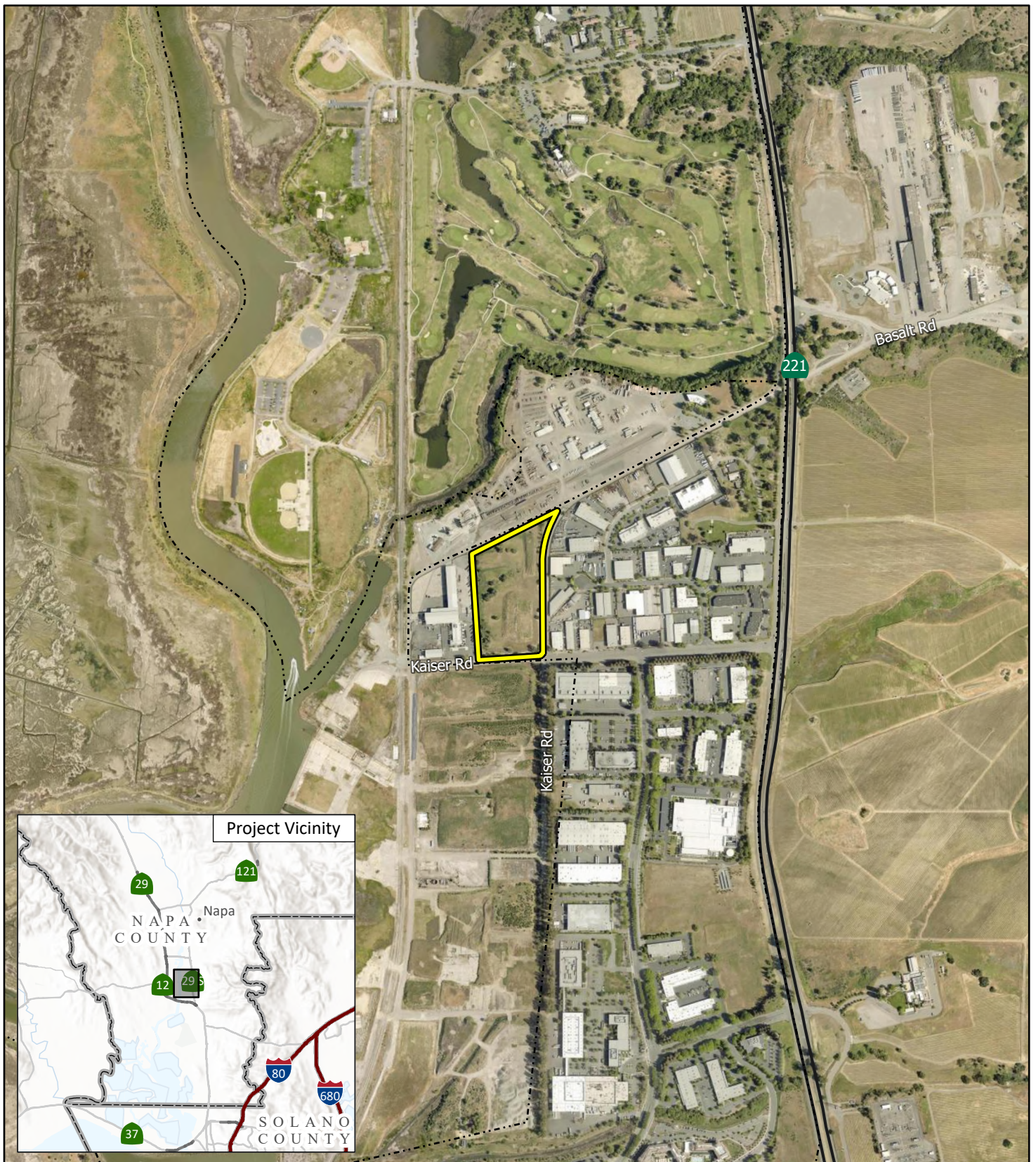


FIGURE 2-1

LSA

- Project Site
- California Cities



0 500 1000
FEET

SOURCE: ESRI Maxar (11/9/2022)

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1030 Kaiser Road Project
Project Location and Vicinity

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LSA

 Project Site

FIGURE 2-2



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SOURCE: Nearmap (7/10/2025)

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1030 Kaiser Road Project Aerial Photograph of the Project Site and Surrounding Land Uses

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2.1.3 Existing Land Use and Zoning

The City of Napa 2040 General Plan¹ designates the Project Site as Light Industrial, which supports a range of small-scale industrial and production-oriented uses, including manufacturing, fabrication, storage, and equipment repair. It also allows for creative and specialized uses such as artisan shops, distilleries, tech start-ups, and research and development facilities, as described in the City's General Plan. According to the City's Zoning Map,² the Project Site is zoned Light Industrial (IL), which permits small-scale manufacturing, fabrication, packaging, storage, equipment repair, wholesale establishments, and similar related uses.³

2.1.4 Surrounding Land Uses

The Project Site is generally surrounded by industrial, residential, and commercial office uses as depicted in **Figure 2-2** and described further below:

- **North:** The Project Site is bordered by Basalt Road, followed by industrial uses to the north. The industrial facilities located north of the Project Site are used to support mining operations. Immediately north of the project site is Basalt Road, a private road that provides internal access to industrial facilities. Tulucay Creek and the Napa Golf Course are located north of the adjacent industrial site.
- **East:** The Project Site is bordered by Syar Way, followed by light industrial uses to the east. A cemetery and mortuary are located northeast of the Project Site, accessed via SR-221.
- **South:** The Project Site is bordered by Kaiser Road, followed by residential uses associated with the Riversound mixed-use development projects immediately south of the Project Site. This area is intended to accommodate a range of housing types, and non-residential uses including retail, hotel, commercial, and light industrial/warehouse uses. Southeast of the Project Site is a business park, which runs adjacent to Riversound Way.
- **West:** The Project Site is bordered to the west by an industrial site associated with a steel fabrication facility. The Napa River is located west of the adjacent industrial site.

2.2 PROPOSED PROJECT

This section describes the Proposed Project as identified in the application materials submitted by the project sponsor to the City of Napa, dated August 18, 2025. **Figure 2-3: Site Plan** includes the proposed site plan.

¹ City of Napa. 2022. *City of Napa 2040 General Plan*. Adopted October 2022. Website: <https://www.cityofnapa.org/DocumentCenter/View/10794/Napa-General-Plan-PDF> (accessed January 29, 2026).

² City of Napa. n.d. *City of Napa Zoning Map*. Website: <https://cityofnapa.maps.arcgis.com/apps/webappviewer/index.html?id=85c06f646a1e4896a9099dc1076ea217&extent=-13645050.4719%2C4607164.0679%2C-13578359.1647%2C4638197.5014%2C102100> (accessed July 9, 2026).

³ City of Napa. 2025. *City of Napa Municipal Code > Title 17 Zoning > Chapter 17.14 Industrial Districts (IP, IL) > Section 17.14.010 E*. Website: <https://ecode360.com/43396564> (accessed January 29, 2026).

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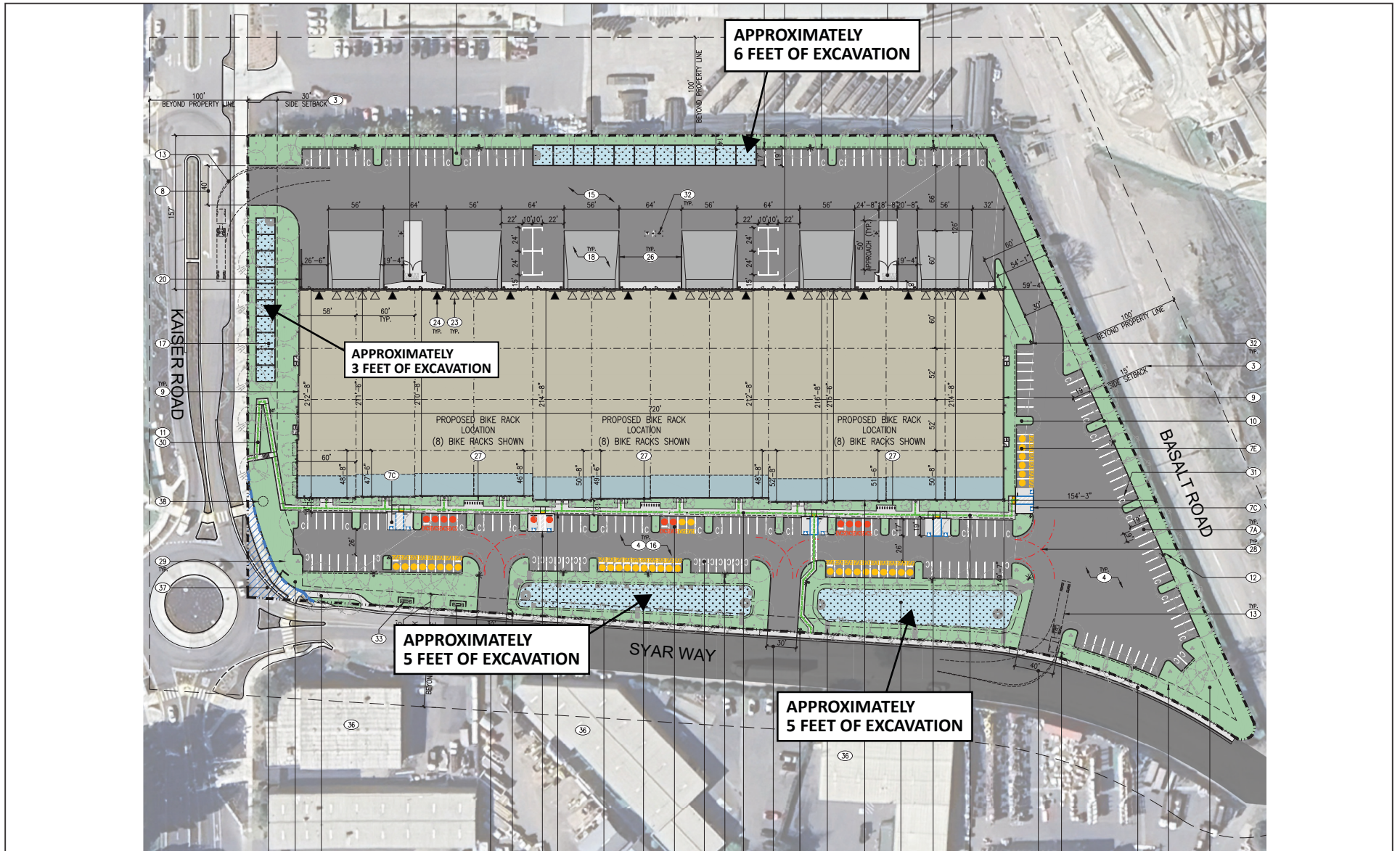
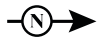


FIGURE 2-3

LSA



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SOURCE: RMW Architecture

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1030 Kaiser Road Project
Site Plan

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2.2.1 Proposed Building and Site Design

The proposed building would be designed for flexible multi-tenant occupancy and would consist of approximately 153,380 square feet, broken up into approximately 130,373 square feet of warehouse space and 23,007 square feet of office space. The building would utilize a tilt-up concrete wall system with a maximum height of 40 feet to the top of the roof parapet. Building materials would include site-cast, tilt-up concrete panels, and tinted glazing systems. The southeast corner of the proposed building would include decorative canopies with steel framing, stone veneer accents, and integrated accent lighting. The primary entrances on the east side of the proposed building would include glazing and metal canopies.

The proposed site layout includes four (4) driveway entrances, 242 vehicle parking spaces, and landscaped areas along the eastern, southern, and northern Project Site boundaries, as well as along the eastern building entrances. Landscaping would utilize low-water-use, drought-tolerant plants, appropriate for the Napa region and compliant with the City of Napa's Landscaping Standards.

Figure 2-4: Landscape Plan shows the proposed landscaping for the project site. Moderate water-use plants would be used sparingly and primarily placed at visual accent areas such as driveways and building entrances. Proposed site signage would include one (1), three (3)-foot-tall, single-sided monument sign at the southeast corner of the Project Site, and up to three (3) wall-mounted tenant signs placed above office entry points on the east and south elevations. Signage would be reviewed and processed under a separate permit from the requested Design Review Permit, which is the subject of this environmental review.

To provide for shipping and receiving needs, the Proposed Project would include 24 loading docks with vertical lift sectional doors along the west side of the proposed building. In addition, a total of five (5) depressed loading docks, each approximately 64 feet wide, would be located on the west side of the proposed building. An additional 12 grade-level vertical lift sectional doors would also be constructed adjacent to each depressed loading dock to provide for a range of shipping and receiving options, including floor-loaded freight.

The Proposed Project would also include an Early Suppression Fast Response (ESFR) sprinkler system equipped with one (1) fire pump rated at approximately 215 horsepower. The pump would be diesel-fired, as an electric pump would not operate during a power outage. The estimated annual runtime is approximately 26 hours, based on a 30-minute weekly testing cycle.

At this time, the specific equipment that would be used during project operations is unknown, as the facility is intended to operate as a multi-tenant property and tenant needs may vary. However, if forklifts are utilized, they would typically be electric-based.

2.2.1.1 Lighting

The Proposed Project would include new exterior lighting throughout the Project Site to ensure visibility and support regular on-site operations. Project lighting would be provided by a combination of pole-mounted light-emitting diode (LED) fixtures in the parking and truck circulation areas and wall-mounted fixtures affixed to the building's exterior. Light poles would generally be positioned within landscape islands and along the drive aisles to provide broad, even illumination

across vehicular and pedestrian zones. Additional lighting would be installed around loading docks and building entrances to support employee access and freight handling.

2.2.1.2 Sustainable Materials and Construction Practices

The Proposed Project would incorporate a wide range of sustainable design features and construction practices intended to minimize environmental impacts, conserve resources, and support long-term energy efficiency, including the following:

- A Project design which routes stormwater runoff from impervious surfaces into a water quality detention and treatment basin, which would be designed to meet local and regional standards
- A Project design with low-volatile organic compound (VOC) sealants, adhesives, coatings, floorings, and wood products
- A Project design including heat-reflecting roof membranes
- The design of new storage and collection areas for solid waste and recyclable materials
- A Project Design including a roof structure designed to support potential future rooftop solar photovoltaic (PV) panel systems.
- A Project Design including the installation of 12 California Green Building Code-compliant electric vehicle (EV) charging stations
- A Project design and construction process guided by a Leadership in Energy and Environmental Design (LEED)-accredited architect familiar with sustainable building practices
- A lighting plan which includes measures to reduce light pollution, such as the selection of light fixtures with an angled design to prevent glare.
- A landscaping design with a focus on water-efficient landscaping
- Implementation of environmental tobacco smoke control measures
- A Stormwater Pollution Prevention Plan (SWPPP) to minimize contamination, erosion, and dust pollution during construction
- Adherence to construction waste management protocols
- Adherence to water use reduction methods during construction

2.2.2 Site Access, Circulation, and Parking

Access to the Project Site would be provided via four (4) driveways, one (1) along Kaiser Road and three (3) along Syar Way, designed to efficiently accommodate both truck and passenger vehicle traffic. Truck traffic would enter the Project Site from Kaiser Road, providing access to 24 elevated

loading docks for shipping and receiving. Trucks would then exit via the northernmost driveway along Syar Way, providing truck access while minimizing interference with passenger vehicle traffic. Internal circulation would be supported by drive aisles of various sizes to provide adequate space for both truck and passenger vehicle traffic. Passenger vehicle traffic would enter and exit from the southern driveway along Kaiser Road, and the two (2) southeastern driveways along Syar Way. Passenger vehicles would be restricted to only right-turn exits onto Kaiser Road.

A total of 242 off-street vehicle parking spaces would be distributed along the northern, eastern, and southern perimeters of the Project Site, including 132 standard stalls, 54 compact stalls, 48 EV-capable vehicle stalls, and 8 ADA-compliant spaces. In addition, 12 of the parking stalls would include electric vehicle (EV) charging stations consistent with California Green Building Standards Code (CALGreen Code) and California Building Code requirements.

Bicycle parking facilities would also be installed near the primary building entrances, located on the east-facing side of the building along Syar Way. A total of 24 short-term bicycle parking spaces would be provided. The proposed site layout is designed to separate truck service areas from employee and visitor parking to allow for operational efficiency and safety for multi-tenant industrial use.

2.2.3 Utilities and Infrastructure

The Project Site is located in an urban/industrial area and is bordered by public rights-of-way which contain existing utility infrastructure, including water, wastewater, storm drainage, electricity, and telecommunications infrastructure. The Proposed Project would extend or connect to the existing utility infrastructure to provide adequate water, wastewater, storm drainage, electricity, and telecommunications service for the anticipated industrial and office uses.

All utility improvements would be designed in compliance with City of Napa Public Works standards and California Building Code requirements. The Proposed Project would also incorporate on-site infrastructure features, such as stormwater treatment planters and LEED building design features, to minimize impacts on public utilities and support sustainable site development pursuant to the City's Low Impact Development (LID) development standards.

2.2.3.1 Water

Potable water service for the Proposed Project would be provided by the City of Napa through a connection to an existing 8-inch water line located in the Syar Way right-of-way. The Proposed Project would install a new on-site domestic water line that connects to this line, distributing water to the proposed office and warehouse areas. Water service would support typical indoor uses, such as restrooms and breakroom fixtures. Recycled water for landscaping features would be supplied by connecting to an 8-inch recycled water line in the Syar Way right-of-way. The Proposed Project would comply with City standards for water meter sizing, pipe material, and backflow prevention. No off-site water infrastructure extensions are anticipated.

2.2.3.2 Wastewater

Wastewater generated by the proposed warehouse and office building would be conveyed to the existing sanitary sewer system through the installation of a new on-site sewer lateral that would connect to an existing sewer main located in the Syar Way right-of-way. The on-site system would consist of gravity-flow sewer lines that would collect wastewater from restrooms, sinks, and other plumbing fixtures within the proposed building. Wastewater infrastructure would be constructed in compliance with the City's Public Works Department and Napa Sanitation District's standards.

2.2.3.3 Stormwater

The Proposed Project would incorporate an on-site stormwater management system compliant with the City's LID standards. Stormwater runoff from the building roof, paved areas, and drive aisles would be directed through a network of surface and subsurface infrastructure, including catch basins, underground storm drainpipes, and landscaped treatment features, to the City's regional drainage system. The proposed site plan includes four (4) bioretention basins located along the perimeter of the Project Site, as shown in **Figure 2-4: Landscape Plan**. These basins would provide approximately 20,969 square feet of bioretention space that would be used for stormwater control and treatment to reduce pollutants of concern in stormwater prior to release into the City's regional drainage system and the receiving waters (i.e., Napa River, San Pablo Bay, and San Francisco Bay). Treated stormwater would be collected and routed to existing storm drain lines within both Kaiser Road and Syar Way, which ultimately conveys flows to the City's regional drainage system. Additionally, **Figure 2-5: Grading and Drainage Plan** shows the proposed grading and drainage plan for the Project.

2.2.3.4 Electrical Service

The Proposed Project would provide electricity service by connecting to existing Pacific Gas and Electric Company (PG&E) utility lines. Electrical service would be routed through new underground infrastructure extending from existing PG&E facilities in the adjacent public rights-of-way. The main electrical service point would be located south of the proposed building, adjacent to Kaiser Road, while conduits and vaults would distribute power internally to tenant spaces, dock equipment, lighting, EV charging, and other electrical infrastructure.

No major off-site utility extensions are anticipated, and the Proposed Project is expected to comply with all applicable energy-efficiency standards in Title 24 of the California Code of Regulations. Further, the Proposed Project would be designed to be all-electric, with no natural gas service proposed as part of the Project.

2.2.4 Project Construction

Construction of the Proposed Project is expected to begin in December 2027 and last approximately 14 months, with the Proposed Project fully operational by January 2029. Construction staging would include initial site clearing and mass grading, followed by utility trenching, foundation work, paving, and vertical construction. Finished floor elevations, pad grades, and spot elevations reflect a balanced cut-and-fill approach that minimizes topographic disturbance. Construction of the Proposed Project would utilize Tier 2 equipment.

The Proposed Project would require a total of 31,678 cubic yards (cy) of cut material and 12,961 cy of fill material, resulting in approximately 18, 717 cy of material being exported off-site.



LSA

FIGURE 2-4

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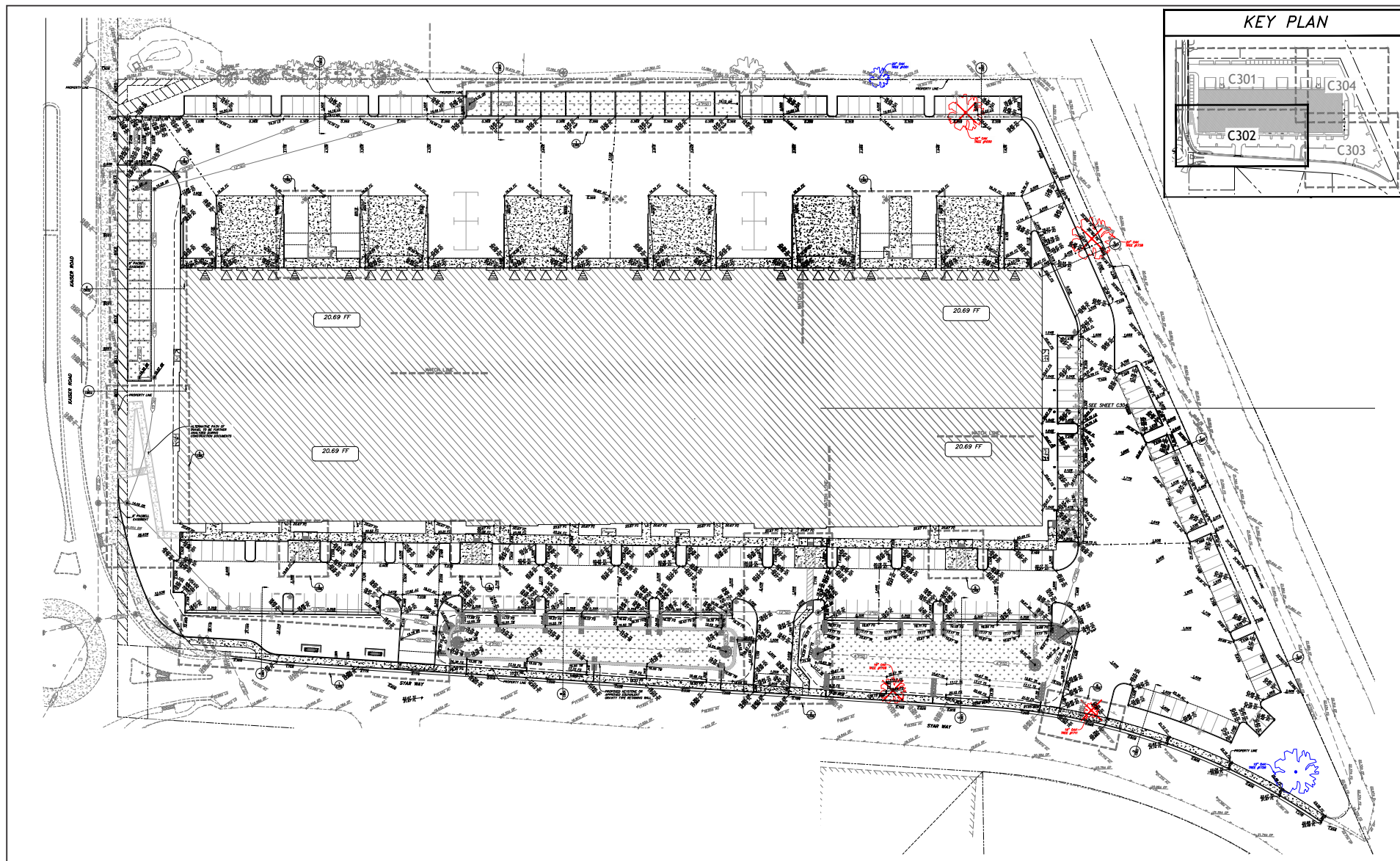


FIGURE 2-5

LSA



SOURCE: Laugenour and Meikle

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1030 Kaiser Road Project
Grading and Drainage Plan

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Under existing conditions, large soil stockpiles are present on site. During construction, the existing stockpiles would be redistributed across the Project Site, raising the overall grade of the Site. Therefore, the only excavation below existing grade would be in the proposed bioretention areas along the perimeter of the Project Site. The proposed bioretention areas make up approximately 0.48 acres of the Project Site. The bioretention areas located along Syar Way would require excavation extending approximately 5 feet in depth, the bioretention area along Kaiser Road would extend to an approximate 3-foot depth, and the bioretention area adjacent to the western property line would extend to an approximate 6-foot depth.

2.3 PERMITS AND APPROVALS

A number of permits and approvals would be required to develop the Proposed Project. As the lead agency for consideration of the Proposed Project, the City of Napa would be responsible for the majority of the approvals required for project development. Other agencies also may have some authority related to the Proposed Project and its approvals. A list of required permits and approvals required by the City and other agencies is provided below in **Table 2.A**.

Table 2.A: Required Permits and Approvals

Agency	Potential Permits/Approvals
City of Napa (Lead Agency)	Environmental Review and Project Approval
City of Napa	Design Review Approval (site layout, access, materials) Grading Permit Erosion and Sediment Control Plan Encroachment Permit Building Permit Stormwater Control Plan
San Francisco Bay Regional Water Quality Control Board	Construction General Permit (SWPPP)
Napa Sanitation District	Construction Permit

Source: LSA (2025).

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3.0 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one (1) impact that is a “Potentially Significant Impact” as indicated by the checklist in Section 4.0.

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

3.1 DETERMINATION

On the basis of this initial evaluation:

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

Signature

Date

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4.0 CEQA ENVIRONMENTAL CHECKLIST

4.1 AESTHETICS

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

4.1.1 Impact Analysis

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

A scenic vista is generally defined as a public vantage point with an expansive view of significant landscape feature(s). According to the Napa 2040 General Plan Final Environmental Impact Report (General Plan EIR),⁴ there are no scenic vistas within the City of Napa. However, the City is characterized by its distant views of rolling hills, mountain ridges, and the Napa River. Prominent visual features within the city include open spaces, riparian corridors along the Napa River, and distant views of vineyards and agricultural fields in Napa County. The Project Site is located in the southern portion of the city, where distant views of the foothills and mountains to the east are visible from the Project Site.

The Proposed Project would result in the development of an industrial building and associated improvements on the Project Site. As an industrial development, the Proposed Project would be consistent with the Project Site's existing Zoning and General Plan land use designation of Light Industrial. The proposed industrial use would also be consistent in size and scale to other nearby industrial uses, would comply with development requirements for the IL zoning district as described in the City of Napa Municipal Code, and would not introduce any oversized architectural or Site design elements that would substantially obstruct distant scenic views in the surrounding area. Although the construction of the proposed building would partially obscure the distant views of the foothills and mountains from the Project Site itself and may impede views from the residential

⁴ City of Napa. 2022b. *City of Napa General Plan Update, Final Environmental Impact Report*, SCH #2021010255. September.

community to the north and east, partial views of the foothills and mountains would still remain visible from nearby public access points, including Kaiser Road, Basalt Road, Riversound Way, and Syar Way. Therefore, the Proposed Project would not have a substantial effect on scenic vistas, and this impact would be **less than significant**. No mitigation is required.

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

According to the California Department of Transportation (Caltrans), no officially designated State Scenic Highways exist in the City of Napa.⁵ Two (2) highways, State Route 29 (SR-29), located approximately 1 mile southwest of the Project Site, and State Route 221 (SR-221) located approximately 0.3 miles east of the Project Site, are considered Eligible State Scenic Highways. Due to existing development, including industrial uses located east of the Project Site, the Project Site is not visible from SR-221. However, the Project Site would be visible from a portion of SR-29, which overlooks the Napa River from the south looking north. Under existing conditions, there are 105 mature trees on site, visible from SR-29. The mature trees would be removed from the Project Site and replaced with new landscaping and trees using plant species appropriate and native to the Napa region. In addition, the proposed development would match the existing industrial feel of the area and is smaller in scale than the residential development currently under construction south of the Project Site. As such, the Proposed Project would not change the viewer experience along SR-29. Therefore, impacts to scenic resources within a State Scenic Highway viewshed would be **less than significant**, and no mitigation is required.

c. In non-urbanized areas, would the project 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 a 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?

The Proposed Project is within an urbanized area, surrounded by existing industrial uses to the north, east, and west, and land under development with residential uses to the south. Implementation of the Proposed Project would result in the development of a 153,380-square-foot industrial building and associated improvements on a site that is currently designated for Light Industrial uses pursuant to the City's General Plan, and zoned IL. The IL zoning designation allows small-scale manufacturing, fabrication, packaging, storage, equipment repair, wholesale establishments, and similar related uses.⁶ As an industrial development, the Proposed Project would be consistent with the intent of the General Plan and zoning designations for the Project Site. The Proposed Project would be designed to be consistent with surrounding industrial uses in the vicinity of the Project Site, and compliance with the City's IL zoning district development standards, such as a maximum building height of 40 feet, and the requirement that all exterior lighting be shielded or

⁵ California Department of Transportation. 2018. *California State Scenic Highway System Map*. Website: <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa> (accessed January 29, 2026).

⁶ City of Napa Municipal Code. 2025. *Title 17 Zoning, Chapter 17.14 Industrial Districts (IP, IL)*. Website: <https://ecode360.com/43396564> (accessed January 29, 2026).

directed downwards to prevent glare.⁷ Additionally, the City does not have zoning and development regulations governing scenic quality in the area of the Project Site. As such, the Proposed Project would not conflict with applicable zoning and development regulations governing scenic quality. Therefore, impacts to the visual character or quality of the Proposed Project Site and its surroundings would be **less than significant**. No mitigation is required.

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

Currently, nighttime lighting is produced by surrounding existing commercial and industrial development, street lighting, and vehicles on adjacent roadways. The Proposed Project would include the development of an industrial building and associated improvements on the Project Site, including new sources of light and glare. The proposed lighting sources would be similar to other lighting sources in the Project Site vicinity and would not generate artificial light levels out of character with the surrounding area, as the area is developed with urban uses that include nighttime lighting.

The Proposed Project would be required to comply with the California Building Code (Title 24, Code of Regulations) and the City's Municipal Code standards. The Proposed Project includes a lighting plan and photometric plan, which shows the types and locations of proposed lighting fixtures on the Project Site. The Proposed Project would include pole-mounted LED fixtures throughout the parking and truck circulation areas, and wall-mounted fixtures affixed to the building's exterior as shown in **Figure 4.1-1, Lighting Plan**. Each proposed lighting fixture has a BUG rating that identifies its backlight (B), uplight (U), and glare (G) characteristics, demonstrating that the proposed light fixtures would minimize light spillover and reduce potential glare onto adjacent properties. The proposed light fixtures have BUG ratings varying from 0 to 3, on a scale from 0 to 5 in light pollution. Therefore, the lighting plan indicates that the illumination levels would be contained within the Project Site and would comply with applicable lighting standards, including Section 17.14.040(L) of the City's Municipal Code, which requires that all exterior lighting be directed or shielded to prevent glare onto public streets and abutting residential properties.⁸

Glare can occur during the daytime and is usually associated with reflective building materials, such as glass, stainless steel, aluminum, and photovoltaic panels. The proposed building exteriors would generally be covered with non-reflective materials, which would minimize glare, and glass windows would be incorporated into the building façade's design. The Project Site perimeter would be developed with street trees, decorative landscaping, architectural features, and other streetscape design techniques to minimize light spillage onto neighboring areas. Additionally, any new sources of light and/or glare introduced by the Proposed Project would be comparable to those emitted by existing industrial uses in the vicinity. Therefore, any impacts related to light and glare resulting from the Proposed Project would be **less than significant**. No mitigation is required.

⁷ City of Napa Municipal Code. 2025. *Title 17 Zoning, Chapter 17.14 Industrial Districts (IP, IL)*. Website: <https://ecode360.com/43396564> (accessed January 29, 2026).

⁸ Ibid.

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FIGURE 2-4

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4.2 AGRICULTURE AND FORESTRY RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

4.2.1 Impact Analysis

- a. *Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*

The Project Site is currently undeveloped and does not contain any existing agricultural uses. According to the California Department of Conservation Farmland Mapping and Monitoring Program, the Project Site is designated as Urban and Built-Up Land and is not designated as Prime Farmland, Farmland of Statewide Importance, or Unique Farmland.⁹ The Urban and Built-Up Land designation is used for residential, industrial, commercial, construction, institutional, and other developed purposes. Therefore, implementation of the Proposed Project would not convert Prime Farmland, Farmland of Statewide Importance, or Unique Farmland to a non-agricultural use. **No impact** would occur, and no mitigation is required.

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

The Project Site is currently zoned IL, which allows warehousing, light manufacturing, research and development, and limited commercial operations that support industrial operations, and does not permit agricultural uses. The Project Site is not zoned for agricultural use and is not under a

⁹ California Department of Conservation. 2025. *California Important Farmland Finder*. Website: <https://maps.conservation.ca.gov/DLRP/CIFF/> (accessed January 29, 2026).

Williamson Act contract.¹⁰ Therefore, implementation of the Proposed Project would not conflict with existing zoning provisions for agricultural use nor with a Williamson Act contract. **No impact** would occur, and no mitigation is required.

c. Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

As discussed above, the Project Site is currently zoned IL. The Project Site is not zoned as forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned for Timberland Production (as defined by Government Code section 51104(g)), and does not contain any forest land. Therefore, implementation of the project would not conflict with existing zoning for forest resources. **No impact** would occur, and no mitigation is required.

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

As previously discussed, the Project Site is currently undeveloped and does not contain any forestland. Therefore, the Proposed Project would not convert any forestland to non-forest use. **No impact** would occur, and no mitigation is required.

e. Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

As discussed above, the Project Site does not consist of and is not adjacent to farmland or forest land, or land that is zoned for agricultural or forestry use. Therefore, implementation of the Proposed Project would not involve other changes in the existing environment which, due to its location or nature, could result in conversion of farmland to non-agricultural use or the conversion of forest land to non-forest use. **No impact** would occur, and no mitigation is required.

¹⁰ California Department of Conservation. n.d. *Williamson Act Enrollment Finder*. Website: <https://maps.conservation.ca.gov/dlrp/WilliamsonAct/App/index.html> (accessed January 29, 2026).

4.3 AIR QUALITY

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☒	☐	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

The Project Site is located within the jurisdiction of the Bay Area Air District (Air District), which regulates air quality in the San Francisco Bay Area. Air quality conditions in the San Francisco Bay Area have improved significantly since the Air District was created in 1955. Ambient concentrations of air pollutants and the number of days during which the region exceeds air quality standards have fallen substantially. In the City of Napa, and the rest of the air basin, exceedances of air quality standards occur primarily during meteorological conditions conducive to high pollution levels, such as cold, windless winter nights or hot, sunny summer afternoons.

Within the Air District, ambient air quality standards for ozone, carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), particulate matter (PM₁₀, PM_{2.5}), and lead (Pb) have been set by both the State of California and the federal government. The State has also set standards for sulfate and visibility. Data collected at permanent monitoring stations are used by the United States Environmental Protection Agency (USEPA) to identify regions as attainment or nonattainment depending on whether the regions meet the requirements stated in the applicable National Ambient Air Quality Standards (NAAQS). At the state level, the California Air Resources Board (CARB) is required to designate areas of the State as attainment, nonattainment, or unclassified for all State standards. An *attainment* designation for an area signifies that pollutant concentrations did not violate the standard for that pollutant in that area. A *nonattainment* designation indicates that a pollutant concentration violated the standard at least once, excluding those occasions when a violation was caused by an exceptional event, as defined in the criteria. An *unclassified* designation signifies that data does not support either an attainment or nonattainment status. The Air District is under State non-attainment status for ozone and particulate matter standards. The Air District is also classified as non-attainment for the federal ozone 8-hour standard and non-attainment for the federal PM_{2.5} 24-hour standard.

4.3.1 Impact Analysis

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

The applicable air quality plan is the Air District's 2017 Clean Air Plan (Clean Air Plan),¹¹ which was adopted on April 19, 2017. The Clean Air Plan is a comprehensive plan to improve Bay Area air quality and protect public health. The Clean Air Plan defines control strategies to reduce emissions and ambient concentrations of air pollutants; safeguard public health by reducing exposure to air pollutants that pose the greatest health risk, with an emphasis on protecting the communities most heavily affected by air pollution; and reduce greenhouse gas emissions to protect the climate. Consistency with the Clean Air Plan can be determined if the project: (1) supports the goals of the Clean Air Plan; (2) includes applicable control measures from the Clean Air Plan; and (3) would not disrupt or hinder implementation of any control measures from the Clean Air Plan.

Clean Air Plan Goals. The primary goals of the Bay Area Clean Air Plan are to attain air quality standards; reduce population exposure and protect public health in the Bay Area; and reduce greenhouse gas emissions and protect climate.

The Air District established significance thresholds for project construction and operational impacts at a level at which the cumulative impact of exceeding these thresholds would have an adverse impact on the region's attainment of air quality standards. The health and hazards thresholds were established to help protect public health. As discussed below, implementation of the Proposed Project would result in less-than-significant operation-period emissions and, with implementation of **Mitigation Measure AIR-1**, the Proposed Project would result in less-than-significant construction-period emissions. Therefore, the Proposed Project would not conflict with the Clean Air Plan goals.

Clean Air Plan Control Measures. The control strategies of the Clean Air Plan include measures in the following categories: Stationary Source Measures, Transportation Measures, Energy Measures, Building Measures, Agriculture Measures, Natural and Working Lands Measures, Waste Management Measures, Water Measures, and Super-Greenhouse Gas (GHG) Pollutants Measures.

Stationary Source Control Measures. The Stationary Source Measures, which are designed to reduce emissions from stationary sources such as metal melting facilities, cement kilns, refineries, and glass furnaces, are incorporated into rules adopted by the Air District and then enforced by Air District Permit and Inspection programs. The Proposed Project would include the use of a 215-horsepower diesel fire pump; however, the fire pump is only expected to run approximately 26 hours annually, based on a 30-minute weekly testing cycle. Therefore, use of the fire pump is not expected to substantially increase emissions. No other stationary sources are being proposed as part of the Proposed Project. Since the Proposed Project would not include metal melting facilities, cement kilns, refineries, and glass furnaces, the Stationary Source Measures of the Clean Air Plan are not applicable to the Proposed Project.

Transportation Control Measures. The Air District identifies Transportation Control Measures as part of the Clean Air Plan to decrease emissions of criteria pollutants, toxic air contaminants

¹¹ Bay Area Air District. 2017. *Clean Air Plan*. April 19.

(TACs), and GHGs by reducing demand for motor vehicle travel, promoting efficient vehicles and transit service, decarbonizing transportation fuels, and electrifying motor vehicles and equipment. The Proposed Project involves the construction of a 153,380-square-foot industrial building, inclusive of approximately 23,007 square feet of office space and 130,373 square feet of warehouse use. As described in Chapter 2.0, Project Description, the Proposed Project would include the installation of 12 electric vehicle (EV) charging stations and would include bicycle parking facilities that would be installed near the primary building entrances. In addition, the Proposed Project is located within a 0.5-mile radius of several bus stops (e.g., Route 11 and G) along Kaiser Road and Napa Valley Corporate Drive that are serviced by the Napa Valley Transportation Authority (NVTa). Therefore, the Proposed Project would facilitate the use of transit and alternative modes of transportation. Furthermore, as described in Section 4.17, Transportation, the Proposed Project is not expected to result in a significant increase in vehicle miles traveled (VMT). As such, the Proposed Project would not conflict with the Air District initiatives to reduce vehicle trips and VMT.

Energy Control Measures. The Clean Air Plan also includes Energy Control Measures, which are designed to reduce emissions of criteria air pollutants, TACs, and GHGs by decreasing the amount of electricity consumed in the Bay Area, as well as decreasing the carbon intensity of the electricity used by switching to less GHG-intensive fuel sources for electricity generation. Since these measures apply to electrical utility providers and local government agencies (and not individual projects), the Energy Control Measures of the Clean Air Plan are not applicable to the Proposed Project.

Building Control Measures. The Air District has authority to regulate emissions from certain sources in buildings such as boilers and water heaters but has limited authority to regulate buildings themselves. Therefore, the strategies in the control measures for this sector focus on working with local governments that do have authority over local building codes, to facilitate adoption of best GHG control practices and policies. The Proposed Project would be required to comply with the latest California Green Building Standards Code (CALGreen Code) standards. Therefore, the Building Control Measures of the Clean Air Plan are not applicable to the Proposed Project.

Agriculture Control Measures. The Agriculture Control Measures are designed to primarily reduce methane emissions. Since the Proposed Project does not include any agricultural activities, the Agriculture Control Measures of the Clean Air Plan are not applicable to the Proposed Project.

Natural and Working Lands Control Measures. The Natural and Working Lands Control Measures focus on increasing carbon sequestration on rangelands and wetlands, as well as encouraging local governments to enact ordinances that promote urban-tree plantings. Since the Proposed Project does not include the disturbance of any rangelands or wetlands, the Natural and Working Lands Control Measures of the Clean Air Plan are not applicable to the Proposed Project.

Waste Management Control Measures. The Waste Management Measures focus on reducing or capturing methane emissions from landfills and composting facilities, diverting organic

materials away from landfills, and increasing waste diversion rates through efforts to reduce, reuse, and recycle. The project would comply with local requirements for waste management (e.g., recycling and composting services). Therefore, the Proposed Project would be consistent with the Waste Management Control Measures of the Clean Air Plan.

Water Control Measures. The Water Control Measures focus on reducing emissions of criteria pollutants, TACs, and GHGs by encouraging water conservation, limiting GHG emissions from publicly owned treatment works (POTWs), and promoting the use of biogas recovery systems. Since these measures apply to POTWs and local government agencies (and not individual projects), the Water Control Measures are not applicable to the Proposed Project. However, the Proposed Project would utilize recycled water for irrigation of the landscape areas, which would be planted with low-water-use, drought-tolerant plants, appropriate to the Napa region, compliant with the City's Water Efficient Landscape Ordinance (WELO). Lastly, the Proposed Project would re-direct stormwater runoff from impervious surfaces into a water quality detention and treatment basin, with on-site detention to meet local standards. As such, the Proposed Project would implement water control measures that would promote water conservation.

Super-GHG Control Measures. The Super-GHG Control Measures are designed to facilitate the adoption of best GHG control practices and policies through the Air District and local government agencies. Since these measures do not apply to individual projects, the Super-GHG Control Measures are not applicable to the Proposed Project.

Clean Air Plan Implementation. As discussed above, the Proposed Project would generally implement the applicable measures outlined in the Clean Air Plan, including Transportation Control Measures. Therefore, the Proposed Project would not disrupt or hinder implementation of a control measure from the Clean Air Plan, and this impact would be **less than significant**. No mitigation is required.

b. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

The Air District is currently designated as a nonattainment area for State and national ozone standards and national particulate matter (PM 2.5) ambient air quality standards. The Air District nonattainment status is attributed to the region's development history. Past, present, and future development projects contribute to the region's adverse air quality impacts on a cumulative basis. By its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project's contribution to the cumulative impact is considerable, then the Proposed Project's impact on air quality would be considered significant.

In developing thresholds of significance for air pollutants, the Air District considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project is expected to exceed the identified emission levels, then its emissions would be considered

cumulatively considerable and the project would have a significant adverse air quality impact. The following analysis assesses the potential construction- and operation-related air quality impacts and CO impacts of the Proposed Project.

Construction Emissions. During construction, short-term degradation of air quality may occur due to the release of particulate matter emissions (i.e., fugitive dust) generated by grading, hauling, and other activities. Emissions from construction equipment are anticipated and would include CO, nitrogen oxide (NO_x), reactive organic gases (ROG), directly emitted particulate matter (PM_{2.5} and PM₁₀), and TACs such as diesel exhaust particulate matter.

Site preparation and project construction would involve grading, paving, and other activities. Construction-related effects on air quality from the Proposed Project would be greatest during the site preparation phase due to the disturbance of soils. If not properly controlled, these activities would temporarily generate particulate emissions. Sources of fugitive dust would include disturbed soil at the construction site. Unless properly controlled, vehicles leaving the site would deposit dirt and mud on local streets, which could be an additional source of airborne dust after it dries. PM₁₀ emissions would vary from day to day, depending on the nature and magnitude of construction activity and local weather conditions. PM₁₀ emissions would depend on soil moisture, silt content of soil, wind speed, and the amount of operating equipment. Larger dust particles would settle near the source, while fine particles would be dispersed over greater distances from the construction site.

Water or other soil stabilizers can be used to control dust, resulting in emission reductions of 50 percent or more. The Air District has established standard measures for reducing fugitive dust emissions (PM₁₀). With the implementation of these Basic Construction Mitigation Measures, fugitive dust emissions from construction activities would not result in adverse air quality impacts.

In addition to dust-related PM₁₀ emissions, heavy trucks and construction equipment powered by gasoline and diesel engines would generate CO, SO₂, NO_x, ROG and some soot particulate (PM_{2.5} and PM₁₀) in exhaust emissions. If construction activities were to increase traffic congestion in the area, CO and other emissions from traffic would increase slightly while those vehicles are delayed. These emissions would be temporary and limited to the immediate area surrounding the construction site.

Construction emissions were estimated for the Proposed Project using the California Emissions Estimator Model (CalEEMod) version 2022.1, consistent with Air District recommendations. Construction of the Proposed Project is anticipated to begin in December of 2027 and occur for approximately 14 months, ending in January 2029, which was included in CalEEMod.¹² The Project Site is currently undeveloped, and no demolition is being proposed as part of the Proposed Project. Construction activities would include site preparation, grading, building construction, paving, and

¹² The CalEEMod analysis evaluated Project construction beginning in July 2026, with operations starting in September 2027. The Proposed Project's construction schedule has since been modified so that Project construction would begin in December 2027 and end in January 2029. This minimal modification to the Project's construction schedule was reviewed by LSA and it was determined that the modified schedule would not result in any new or more severe impacts than what is described within.

architectural coating activities. The Proposed Project would require the export of approximately 18,720 cubic yards of soil, which was included in CalEEMod. In addition, this analysis conservatively assumes use of Tier 2 construction equipment. Other detailed construction information is currently unavailable; therefore, this analysis utilizes CalEEMod default assumptions (e.g., construction equipment and fleet activities, construction trips and truck trips). Construction-related emissions are presented in Table 4.3.A. CalEEMod output sheets are included in **Appendix A1**.

Table 4.3.A: Project Construction Emissions in Pounds Per Day

Average Daily Emissions per Construction Year	ROG	NO _x	Exhaust PM ₁₀	Fugitive Dust PM ₁₀	Exhaust PM _{2.5}	Fugitive Dust PM _{2.5}
2026	0.4	11.2	0.3	1.2	0.3	0.5
2027	4.8	8.3	0.3	0.3	0.3	0.1
Maximum Average Daily Emissions	4.8	11.2	0.3	1.2	0.3	0.5
Air District Thresholds ¹	54.0	54.0	54.0	BMP	82.0	BMP
Exceed Threshold?	No	No	No	No	No	No

Source: LSA (May 2026).

¹ The Air District does not have a quantitative threshold for fugitive dust emissions from construction. The Air District requires the implementation of standard construction BMPs to reduce construction fugitive dust.

BMP = best management practices

NO_x = nitrogen oxide

ROG = reactive organic gases

PM₁₀ = particulate matter less than 10 microns in size

PM_{2.5} = particulate matter less than 2.5 microns in size

As shown in Table 4.3.A, construction emissions associated with the Proposed Project would be less than significant for ROG, NO_x, PM_{2.5}, and PM₁₀ exhaust emissions. The Air District requires the implementation of Basic Best Management Practices for Construction to reduce construction fugitive dust impacts to a less-than-significant level as follows:

Mitigation Measure AIR-1

In order to meet the Bay Area Air District (Air District) fugitive dust threshold, the following Air District Basic Best Management Practices for Construction-Related Fugitive Dust Emissions shall be implemented by the Project Sponsor during the project construction period:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two (2) times per day.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt tracked out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All vehicle speeds on unpaved roads shall be limited to 15 mph.

- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.
- All trucks and equipment, including their tires, shall be washed off prior to leaving the site.
- Unpaved roads providing access to sites located 100 feet or further from a paved road shall be treated with a 6- to 12-inch layer of compacted layer of wood chips, mulch, or gravel.
- A publicly visible sign shall be posted with the telephone number and person to contact at City of Napa regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

As shown in Table 4.3.A, construction emissions associated with the Proposed Project would be less than significant with implementation of Mitigation Measure AIR-1. Therefore, construction of the Proposed Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is deemed non-attainment status, under an applicable federal or State ambient air quality standards. Thus, impacts would be **less than significant with mitigation incorporated**.

Long-Term (Operational) Emissions. Long-term air pollutant emission impacts are those associated with mobile sources (e.g., vehicle trips), energy sources (e.g., natural gas), area sources (e.g., landscape maintenance equipment use), and stationary sources (e.g., fire pump) related to the Proposed Project. However, the Proposed Project would not utilize natural gas during project operations.

Mobile source emissions include ROG and NO_x emissions that contribute to the formation of ozone. Additionally, PM₁₀ emissions result from running exhaust, tire and brake wear, and the entering of dust into the atmosphere from vehicles traveling on paved roadways.

Typically, area source emissions consist of direct sources of air emissions located at the Project Site, including architectural coatings and the use of landscape maintenance equipment. Area source emissions associated with the Proposed Project would include emissions from the use of landscaping equipment.

Stationary source emissions associated with the Proposed Project would include the use of the 215-horsepower diesel fire pump, which would have an estimated annual runtime of approximately 26 hours, based on a 30-minute weekly testing cycle.

Emission estimates for operation of the Proposed Project were calculated using CalEEMod. The Proposed Project involves the construction of a 153,380-square-foot industrial building, inclusive of approximately 23,007 square feet of office space and 130,373 square feet of warehouse use. Therefore, this analysis was conducted using CalEEMod land use codes *Unrefrigerated Warehouse-No Rail, General Office Building, and Parking Lot*.¹³ Trip generation rates for the project were scaled to be consistent with the Proposed Project's trip generation of 411 daily trips, based on 130,373 square feet of high-cube fulfillment center warehouse (Land Use 155), 23,007 square feet of general office (Land Use 710), and trip rates from the 12th Edition Institute of Transportation Engineers (ITE) Trip Generation Manual. As described above, the Proposed Project would not include the use of natural gas; therefore, this analysis includes selections to reflect no natural gas usage. In addition, the Proposed Project would include the use of a 215-horsepower diesel fire pump with an estimated annual runtime of approximately 26 hours, which was also included in CalEEMod. Where project-specific data were not available, default assumptions (e.g., energy usage, water usage, and solid waste generation) from CalEEMod were used to estimate project emissions. CalEEMod output sheets are included in **Appendix A1**.

The primary emissions associated with the Proposed Project are regional in nature, meaning that air pollutants are rapidly dispersed on release or, in the case of vehicle emissions associated with the Proposed Project, emissions are released in other areas of the Air Basin. The daily and annual emissions associated with Project's operational trip generation, energy, and area sources are identified in Table 4.3.B for ROG, NO_x, PM₁₀, and PM_{2.5}.

¹³ For purposes of analyzing criteria air pollution emissions, CalEEMod (Version 2022.1) incorporates 79 land uses from the Institute of Traffic Engineers (ITE) *Trip Generation Manual*, (10th Edition, 2017). These land uses are similar to but vary from the land uses employed for purposes of evaluating transportation impacts, which utilizes the most recent version of the ITE *Trip Generation Manual* (12th Edition, 2025) and allows for a wider number of land uses for consideration in the analysis.

Table 4.3.B: Project Operational Emissions

	ROG	NO _x	PM ₁₀	PM _{2.5}
Average Daily Emissions (Pounds Per Day)				
Mobile Source Emissions	1.6	1.9	2.9	0.8
Area Source Emissions	4.3	<0.1	<0.1	<0.1
Energy Source Emissions	0.0	0.0	0.0	0.0
Stationary Source Emissions	<0.1	0.1	<0.1	<0.1
Total Emissions	5.9	2.0	2.9	0.8
Air District Thresholds	54.0	54.0	82.0	54.0
Exceed Threshold?	No	No	No	No
Tons Per Year				
Mobile Source Emissions	0.3	0.3	0.5	0.1
Area Source Emissions	0.8	<0.1	<0.1	<0.1
Energy Source Emissions	0.0	0.0	0.0	0.0
Stationary Source Emissions	<0.1	<0.1	<0.1	<0.1
Total Emissions	1.1	0.3	0.5	0.1
Air District Thresholds	10.0	10.0	15.0	10.0
Exceed Threshold?	No	No	No	No

Source: LSA (May 2026).

NO_x = nitrogen oxide

ROG = reactive organic gases

PM₁₀ = particulate matter less than 10 microns in size

PM_{2.5} = particulate matter less than 2.5 microns in size

The results shown in Table 4.3.B indicate the Proposed Project's operations would not exceed the significance criteria for daily or annual ROG, NO_x, PM₁₀ or PM_{2.5} emissions. Therefore, operation of the Proposed Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is deemed nonattainment status under an applicable federal or State AAQS, and impacts would be **less than significant**.

Localized CO Impacts. Emissions and ambient concentrations of CO have decreased dramatically in the Bay Area with the introduction of the catalytic converter in 1975. No exceedances of the State or federal CO standards have been recorded at Bay Area monitoring stations since 1991. The Air District 2022 CEQA Guidelines include recommended methodologies for quantifying concentrations of localized CO levels for proposed transportation projects. A screening level analysis, using guidance from the Air District CEQA Guidelines, was performed to determine the impacts of the Proposed Project. The screening methodology provides a conservative indication of whether the implementation of a proposed project would result in significant CO emissions. According to the Air District CEQA Guidelines, a proposed project would result in a **less than significant** impact on localized CO concentrations if the following screening criteria are met:

- The Proposed Project is consistent with an applicable congestion management program established by the county congestion management agency for designated roads or highways, and the regional transportation plan and local congestion management agency plans.
- Project traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour.

- The Proposed Project would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, or below-grade roadway).

Implementation of the Proposed Project would not conflict with the policies or programs of the Napa Valley Transportation Authority (NVTa). As identified in Section 4.17, Transportation, the Proposed Project is anticipated to generate 411 daily trips, including 44 a.m. peak-hour trips and 45 p.m. peak-hour trips. Based on the operational trip generation, it is anticipated that the Proposed Project would not have any adverse impacts on the surrounding circulation system. The Proposed Project's contribution to peak hour traffic volumes at intersections in the vicinity of the Project Site would be well below 44,000 vehicles per hour. Furthermore, based on the project's location in a low VMT area, the Proposed Project can be screened out of a detailed VMT analysis. As such, the Proposed Project is not expected to result in a significant increase in VMT, and impacts would be less than significant. Therefore, the Proposed Project would not result in localized CO concentrations that exceed State or federal standards and impacts would be **less than significant**.

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

Sensitive receptors are defined as places and/or populations that have an increased sensitivity to air pollution or environmental contaminants. Sensitive receptor locations include schools, parks and playgrounds, day care centers, nursing homes, hospitals, and residential dwelling units. Currently, residential homes are being constructed south of the Project Site. Therefore, the closest sensitive receptors would include the future single-family residential homes that would be located south of the Project Site across Kaiser Road, approximately 138 feet from the Project Site's southern boundary.

According to the California Air Resources Board, air pollution studies have shown that diesel exhaust and other cancer-causing chemicals emitted from cars and trucks are responsible for much of the overall cancer risk from airborne toxins in California. These studies have also shown an association between respiratory and other non-cancerous health effects, and proximity to high-traffic roadways. Accordingly, the Proposed Project is subject to a site-specific Health Risk Assessment (HRA) (**Appendix A2**) to estimate the increased health risk levels from the generation of TACs for people living and/or working near the site. The majority of the estimated health risks from TACs are attributed to relatively few compounds, the most important being particulate matter from diesel-fueled engines (DPM).

In accordance with the Air District guidance, a health risk is considered significant under the following conditions:

- The cancer risk at a nearby sensitive receptor location (i.e., area where persons reside, work, or attend school, not including streets or sidewalks) is greater than 10 cases per 1 million persons over a period of 30 years for adults and 9 years for children (residential uses) and a period of 25 years for workers.

- The cumulative increase in total chronic Hazard Index¹⁴ or total acute Hazard Index¹⁵ for any target organ system would exceed 1.0 at any receptor location.
- The project would be considered significant if the annual average PM_{2.5} concentration is greater than the Air District threshold of 0.3 micrograms per cubic meter (µg/m³)

Cumulative thresholds address the potential that a project would have a cumulative significant impact if the aggregate total of all past, present, and foreseeable future sources within a 1,000-foot radius (or greater where appropriate) results in:

- An excess cancer risk level of more than 100 in a million; or
- A non-cancer hazard index greater than 10.0 (chronic); or
- An annual average of PM_{2.5} greater than 0.8 µg/m³.

The following analysis is based on the project-specific Health Risk Assessment prepared for the Proposed Project, which is included in **Appendix A2** of this IS/MND.¹⁶

Construction. A construction HRA, which evaluates construction-period health risk to off-site receptors, was performed for the Proposed Project. Table 4.3.C, below, identifies the results of the construction HRA analysis at the maximally exposed individual (MEI).

Table 4.3.C: Health Risks from Project Construction to Off-Site Receptors

Location	Carcinogenic Inhalation Health Risk in 1 Million	Chronic Inhalation Hazard Index	Acute Inhalation Hazard Index	Annual Average PM _{2.5} Concentration
Residential Receptor Risk	0.34	0	0	0
Worker Receptor Risk	0.73	0.03	0	0.15
Air District Significance Threshold	10 in 1 million	1.0	1.0	0.3
Significant?	No	No	No	No

Source: Compiled by LSA (May 2026).

Air District = Bay Area Air District

PM_{2.5} = particulate matter 2.5 microns or less

As shown in Table 4.3.C, the maximum cancer risk for the residential MEI would be 0.34 in 1 million, which would not exceed the Air District cancer risk threshold of 10 in 1 million. The worker receptor risk would be higher at 0.73 in 1 million, which would also not exceed the Air District cancer risk threshold of 10 in 1 million. The total chronic hazard index would be 0.0 for the residential MEI and

¹⁴ Chronic Hazard Index is the ratio of the estimated long-term level of exposure to a TAC for a potential maximum exposed individual to its chronic reference exposure level. The chronic Hazard Index calculations include multi-pathway consideration when applicable.

¹⁵ Acute Hazard Index is the ratio of the estimated maximum 1-hour concentration of a TAC for a potential maximum exposed individual to its acute reference exposure level.

¹⁶ LSA. 2026. *Health Risk Assessment: 1030 Kaiser Road Project, Napa, California*. May (Appendix A2).

0.03 for the worker MEI, which is below the threshold of 1.0. In addition, the total acute hazard index would be nominal (0.00), which also would not exceed the threshold of 1.0. Therefore, construction of the Proposed Project would not exceed the Air District thresholds and would not expose nearby sensitive receptors to substantial pollutant concentrations. Impacts would be **less than significant**.

Operational Health Risk. To determine the potential health risk to people living and working near the Proposed Project, an operational HRA was conducted for the Proposed Project. Table 4.3.D details the carcinogenic and chronic health risks from operation of the Proposed Project. The residential risk incorporates both the risk for a child living in a nearby residence for 9 years (the standard period of time for child risk) and an adult living in a nearby residence for 30 years (considered a conservative period of time for an individual to live in any one residence).

Table 4.3.D: Health Risk from Project Operation to Off-Site Receptors

Location	Carcinogenic Inhalation Health Risk in 1 Million	Chronic Inhalation Hazard Index	Acute Inhalation Hazard Index	Annual Average PM _{2.5} Concentration
Residential Receptor Risk	2.20	0	0	0
Worker Receptor Risk	5.28	0.02	0.01	0.08
Air District Significance Threshold	10.0 in 1 million	1.0	1.0	0.3
Significant?	No	No	No	No

Source: Compiled by LSA (May 2026).

Air District = Bay Area Air District

PM_{2.5} = particulate matter 2.5 microns or less

As indicated in Table 4.3.D, the maximum cancer risk for the residential MEI would be 2.20 in 1 million, less than the threshold of 10 in 1 million. The maximum cancer risk for the worker MEI would be 5.28 in 1 million, also less than the threshold of 10 in 1 million. Both the chronic and acute health risks for residential MEI are 0.00 and indicate the Hazard Index is well below the threshold of 1.0. The chronic and acute risk for the worker MEI would also be below the threshold of 1.0, with the Hazard Index rating of 0.02 and 0.01, respectively. All health risk levels to nearby residents and workers from emissions of TACs from the Proposed Project were calculated under worst-case scenarios which assume that all truck trips would be concentrated in proximity to the nearest sensitive receptors. Even when considering this worst-case scenario, the results indicate that both the construction and operational health risk of the proposed Project would be below the Air District's HRA thresholds.

Furthermore, to assess the potential risk from stationary sources, LSA used the Air District's latest Stationary Source Screening Tool, which provides a map of all the stationary sources permitted by the Air District with risk and hazard estimates of stationary emission sources such as gas stations, diesel emergency generators, and incinerators. Health risk data was provided for each facility. Google Earth's measurement tool was used to determine the distance from the emission source to the location of the sensitive receptor.

LSA further refined the results through the Public BAAQMD Health Risk Calculator Beta Version 5.0 to evaluate source-specific health risks at the Project Site based on source proximity. Specifically, the distance between each identified stationary source and the Project Site was measured and compared to the screening distances available within the BAAQMD Health Risk Calculator. Where the exact measured distance was not available within the calculator, the nearest available screening distance was conservatively selected for evaluation. The corresponding carcinogenic hazard index and annual average PM_{2.5} concentration values associated with the selected screening distances were then used to estimate source-specific health risk exposure at the Project Site.

In addition, roadway screening was conducted consistent with Air District screening methodologies to evaluate potential exposure to mobile-source emissions from nearby roadways. Nearby roadway sources were identified based on roadway screening contours within the vicinity of the Proposed Project. The Air District screening tool provides a range of cancer risk, chronic hazard index, and PM_{2.5} concentration values associated with the identified roadway sources. To provide a conservative evaluation, the higher end of the applicable screening range was utilized for the cumulative health risk assessment.

Health risks from all sources within 1,000 feet of the Project Site are shown in Table 4.3.E.

Table 4.3.E: All Sources Within 1,000 Feet of the Project Site

Source Type	Distance (feet)	Carcinogenic Inhalation Health Risk in One Million	Chronic Hazard Index	Annual Average PM _{2.5} Concentration (µg/m ³)
Mobile Sources (Basalt Road)	-	20.0	0.1	0.1
Mobile Source (Syr Way)	-	20.0	0.1	0.1
Mobile Source (Kaiser Road)	-	20.0	0.1	0.3
Paupaiz Fine Coffees, 978B Kaiser Road (manufacturing)	320.01	0	0	0
Regulus, 860 Latour Court (generator)	958.61	4.0	0	0
Royal Coach Limousine Services, 988 Enterprise Way (nonretail gas station)	130.62	0	0	0
Syr Concrete LLC, 760 North of West End of Kaiser Road (manufacturing)	692.67	0	0	0.38
Total Risk Levels		64.0	0.3	0.43
Air District Threshold		100.00	10	0.80
Exceeds?		No	No	No

Source: Compiled by LSA (May 2026).

µg/m³ = micrograms per cubic meter

Air District = Bay Area Air District

PM_{2.5} = particulate matter less than 2.5 microns in size

As shown in Table 4.3.E, the cumulative health risk of mobile and stationary sources would be less than the Air District's cumulative risk and hazard thresholds. Therefore, receptors at the Project Site would not be exposed to significant cumulative health risk impacts.

Therefore, once the proposed project is constructed, it would not be a source of substantial emissions. The Proposed Project would not expose sensitive receptors to substantial levels of TACs, and this impact would be **less than significant**. No mitigation is required.

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

During Project construction, some odors may be present due to diesel exhaust. However, these odors would be temporary and limited to the construction period. The Proposed Project would not include any activities or operations that would generate objectionable odors and once operational, the Proposed Project would not be a source of odors. Therefore, the Proposed Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. This impact would be **less than significant**, and no mitigation is required.

4.4 BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☒	☐
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e. Conflict with any 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?	☐	☐	☐	☒

The following thresholds described below were used in completing the analysis of potential project impacts for the purposes of CEQA. For the purposes of this analysis, a “substantial adverse effect” is generally interpreted to mean that a potential impact could directly or indirectly affect the resiliency or viability of a local biological community or population of a species. Potential impacts to natural processes that support biological communities and special-status species populations that can produce similar effects are also considered potentially significant. Impacts to individuals of a species or small areas of existing biological communities may be considered less than significant if those impacts are speculative, are not beneficial, and/or would not affect the resiliency of a local population.

Impacts are defined as project-related activities that change, destroy, damage, or otherwise adversely affect biological resources. Impacts may include injury or mortality to plant or wildlife species and effects on an animal’s behavior (for example, harassment or frightening off an animal by construction noise), as well as the loss, modification, or disturbance of natural resources or habitats. Impacts can be either direct or indirect and either permanent or temporary.

Direct impacts are generally those that occur during project implementation and at the same time and location as the cause of the impact. Direct impacts for this project may include injury, death, and/or harassment of special-status wildlife species, if present in the work areas or vicinity. Direct impacts may also include the destruction of habitat necessary for special-status species breeding, feeding, or sheltering. Direct impacts to special-status plants can include crushing of plants, root systems, or seeds where present in the impact areas.

Indirect impacts are those that are reasonably foreseeable and caused by a project but occur later in time and/or potentially at locations of some distance from the source of the impact. If a direct physical change in the environment in turn causes another change in the environment, then the secondary change would be considered an indirect impact.

Permanent impacts are those that result in the long-term or irreversible loss of biological resources. For example, the construction of new buildings and paved areas, which would result in a large, developed, and fenced property where native vegetation may have existed before, would constitute a permanent impact.

Temporary impacts on biological resources are those that are reversible over time, with or without implementation of avoidance measures. Examples include the generation of dust and noise during demolition or construction, trimming or crushing of vegetation that will regrow following project completion, and removal of vegetation that will be actively restored. These temporary impacts are anticipated to last during project implementation and shortly thereafter. However, the biological resources are anticipated to return to pre-project conditions after project completion.

The potential for protected resources to be impacted by construction and operation of the Proposed Project may vary depending on likelihood that the species is present when the project is constructed, as well as of the type and duration of construction activities. Another factor is the sensitivity of the species or resource(s) to disturbance.

Using the CEQA analysis methodology outlined above, the following section describes potential significant impacts to sensitive resources within the Project Site and suggests mitigation measures that would reduce impacts to less than significant levels.

The information and analysis in this section are based, in part, on the Biological Resources Assessment (BRA)¹⁷ (**Appendix B**) prepared for the Proposed Project by LSA and dated March 2026.

¹⁷ LSA. 2026. *Biological Resources Assessment, 1030 Kaiser Road Project*. March.

4.4.1 Impact Analysis

- a. *Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

The Proposed Project would not have a substantial adverse effect on any special-status plant species because none are expected to occur on the site.

Two special-status wildlife species have a low potential to be impacted by the project: Swainson's Hawk (SWHA) (*Buteo swainsoni*) and Crotch's bumble bee (*Bombus crotchii*). The Proposed Project could also affect nesting migratory birds, which are protected even if the species is not special-status.

In addition to the species-specific mitigation measures identified further below, the following mitigation measures, which require that an environmental education program be conducted prior to Project construction and that Best Management Practices (BMPs) be implemented during Project construction, would be implemented to reduce potential direct and indirect impacts to special-status species to a **less than significant** level.

Mitigation Measure BIO-1a A qualified biologist shall conduct an environmental education program for all persons employed or otherwise working on the Project Site before they perform any work. The program shall consist of a presentation from the biologist that includes a discussion of the biology and general behavior of special-status species on or near the site; information about the distribution and habitat needs of the species; sensitivity of the species to human activities; the status of the species pursuant to the Federal Endangered Species Act, the California Endangered Species Act, and the California Fish and Game Code, including legal protection; recovery efforts; penalties for violations; and any project-specific protective measures described herein or any subsequent documents, such as an Incidental Take Permit and/or Biological Opinion. Interpretation shall be provided for non-English-speaking workers, and the same instruction shall be provided for any new workers before they perform work on the site. The biologist shall prepare and distribute a handout containing this information for workers to carry on the site. Upon completion of the program, employees shall sign a form stating they attended the program and understand all the protection measures. Copies of the form shall be provided to the City of Napa.

Mitigation Measure BIO-1b A qualified biologist shall be on the site daily to monitor initial vegetation clearing and ground-disturbing activities.

With implementation of **Mitigation Measures BIO-1a and 1b**, in conjunction with species-specific measures described below, impacts to common and special-status wildlife species would be reduced to **less than significant with mitigation incorporated**, by ensuring that direct and indirect effects to special-status species are avoided during project construction.

As described above, based on a review of the species' habitat requirements, the existing habitats on the site, and connections or barriers to other populations in open-space lands, it was determined that two special-status animal species could be impacted by the Proposed Project. These species are described further below.

Swainson's Hawk

The Proposed Project would have a substantial adverse effect on SWHA if work took place during the breeding season and the work resulted in the direct destruction of a nest. Noise and activity associated with the Proposed Project could also adversely affect SWHA.

As noted above, there is some potential for SWHA to nest on or near the Project Site. To avoid adverse effects to the SWHA, the project should include recommendations based on California Department of Fish and Wildlife's (CDFW) *Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley*, *Swainson's Hawk Technical Advisory Committee* (May 31, 2000). Based on this document, these migratory hawks return to their nesting territories around April 1, and by July 31, the young have generally fledged.

Potential impacts to SWHA would be less than significant with the implementation of **Mitigation Measure BIO-2**, which could be implemented in three ways.

Mitigation Measure BIO-2

Option 1: Start Construction Before the Birds Return to the Nest Site (before April 1). If initiating construction before the return of the birds to the nesting territory, the returning birds will either choose to return to the old nest if not disturbed by the construction activity or will move to a new nest site nearby but away from the construction activity. If project work is underway when the hawks return and the pair decide to use the nest in question, the assumption is that the construction activity is not at a level of disturbance to adversely affect nesting.

Option 2: Initiate Construction After Fledging. If initiating construction after July 31, adult and young hawks would not likely be adversely affected by construction activity because they would not be confined to the nest site at this time. Even though the young are often still using the area around the nest site after fledging, they are mobile and can move away from any source of disturbance. In addition, after fledging, the adults will not be visiting the nest site regularly to feed the young.

Option 3: Monitoring During Construction if Work Is Initiated During the Nesting Season. If construction is scheduled to start between April 1 and July 31, a qualified biologist will conduct a full protocol nesting survey per California Department of Fish and Wildlife (CDFW) recommendations (CDFW 2000), including areas within 0.5 mile of the Project Site. If an active nest is found within the survey area, the nest will be monitored during construction until the young have fledged, or it has been determined that construction activities are not having adverse effects on nesting. If monitoring determines that construction activity is adversely affecting nesting activity (e.g., adult birds are exhibiting agitation from construction noise or avoiding the nest site), then the qualified biologist will have the authority to stop construction activities and will contact CDFW for guidance.

Crotch's Bumble Bee

Potential impacts to Crotch's bumble bee would be less than significant with implementation of **Mitigation Measure BIO-3.**

Mitigation Measure BIO-3

A qualified biologist shall conduct surveys during the colony active period and gyne flight season (generally, April 1 to October 31) no more than 14 days prior to the commencement of construction activities. The survey shall occur at least 2 hours after sunrise (greater than 60 degrees Fahrenheit [°F] and less than 90°F with no rain) or 2 hours before sunset, and the survey area shall include all suitable project boundaries and a surrounding 100-foot buffer area. The survey duration shall be appropriate to the size of the Project Site and buffer area based on the metric of a minimum of 1 person-hour of searching per 3 acres of suitable habitat, which would be approximately 4 hours for the Project Site. Bumble bees move nest sites each year; therefore, surveys shall be conducted each year that project work activities will occur. Further guidance on presence surveys can be found within the CDFW's 2023 *Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species* (available online at <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline>).

Surveyors may not capture or handle bumble bees unless authorized specifically for Crotch's Bumble Bee by CDFW. Bumble bees may only be netted, chilled, and photographed for identification purposes if the biologist is authorized by a Memorandum of Understanding (MOU) in accordance with Fish and Game Code 2081(a). The MOU would not cover take caused by project-related activities.

At minimum, pre-construction surveys shall include the following:

1. Search areas with flowering plants for foraging bumble bees. Observed foraging activity may indicate a nest is nearby, and therefore, the survey duration should be increased when foraging bees are present.
2. Watch any bumble bees present and observe their flight patterns. Attempt to track their movements between foraging areas and the nest.
3. Visually examine for nest entrances. Observe burrows, any other underground cavities, logs, or other possible nesting habitat.
4. Look for concentrated bumble bee activity.
5. Listen for humming of nest colony.
6. If bumble bees are observed, attempt to identify the species by taking a picture.

If Crotch's bumble bees, or potential Crotch's bumble bees (since bumble bees can be difficult to identify in the field) are observed within the Project Site, a plan to protect bumble bee nests and individuals shall be developed and implemented in consultation with the CDFW and United States Fish and Wildlife Service (USFWS). The plan shall include, but not be limited to, the following measures:

1. Specifications for construction timing and sequencing requirements (e.g., avoidance of mowing, grading, or other ground disturbance until late March to protect overwintering queen bumble bees);
2. Establishment of appropriate no-disturbance buffers for bumble bee nest sites to avoid impacts to the bees and construction monitoring by a qualified biologist to ensure compliance if bumble bee nests are identified; and
3. Restrictions associated with construction practices, equipment, or materials that may harm bumble bees (e.g., avoidance of pesticides/herbicides).

The loss of potential Crotch's bumble bee habitat on the site is unlikely to rise to the level of "substantial effect" given the poor

habitat quality and small footprint of the project relative to the amount of high-quality protected habitat in other parts of Napa County.

Nesting Birds

In addition to special-status species, the active nests of common native bird species are protected by the California Fish and Game Code and thus have special status. The Project Sponsor is responsible for ensuring that the Proposed Project does not result in any violation of Fish and Game Code Sections 3503, 3503.5, and 3513. It is likely that several species of native birds nest on and adjacent to the site each year. Tree removal, grading, and construction could impact nesting birds due to destruction or damage of active nests, or through disturbance to nesting birds from construction activity and noise causing nest abandonment. Potential impacts to nesting birds would be less than significant with implementation of **Mitigation Measures BIO-4a and 4b**.

Mitigation Measure BIO-4a Information on protected migratory birds shall be included in the environmental education program, as detailed in Mitigation Measure BIO-1a.

Mitigation Measure BIO-4b If project activities will occur during the nesting bird season (February 1 to September 15), a qualified biologist shall conduct a reconnaissance-level survey for active nests within the 72 hours prior to the initiation of project-related activities. Surveys shall be conducted in all potential habitat areas located at, and adjacent to, project work sites and in staging and storage areas. The minimum survey radii surrounding the work area shall be as follows: 250 feet for non-raptors and 1,000 feet for raptors. Surveys shall be conducted during periods of peak activity (i.e., early morning and dusk) and shall be of sufficient duration to observe movement patterns. Survey methodology and results shall be submitted to CDFW in a Preconstruction Report. If a lapse in project-related activities of 7 days or longer occurs, another focused survey will be required before project activities can be reinitiated. If active nests of native birds are found in or within line of sight of the work area, the biologist shall determine an appropriately sized buffer around the nest, and no work shall be allowed in this buffer until the young have successfully fledged. The size of the nest buffer shall be determined by a qualified biologist in consultation with CDFW and shall be based on the nesting species and its sensitivity to disturbance. These buffers may be increased or decreased, as appropriate, depending on the bird species and the level of disturbance anticipated near the nest. Active nests shall be monitored to ensure that the exclusion zones are intact and to determine whether the young have fledged or the nest has failed. The exclusion zones shall remain in place until the young have

fledged and are foraging independently or the nest has failed, as determined by a qualified biologist.

Implementation of **Mitigation Measures BIO-4a and BIO-4b** would reduce potential impacts to nesting birds to a less than significant level by requiring pre-construction nesting bird surveys and establishment of buffers around identified nests.

Therefore, with implementation of **Mitigation Measures BIO-1a through BIO-1b, BIO-2, BIO-3, and BIO-4a through BIO-4b**, impacts to special-status species would be **less than significant with mitigation incorporated**.

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

No riparian habitat or other sensitive natural community is present on the Project Site. As a result, the Proposed Project would have **no impact** on riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the CDFW or the United States Fish and Wildlife Service. No mitigation is required.

c. Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

There are no federally protected wetlands, waters of the United States, or waters of the State on the Project Site.

The 2020 guidance says that the jurisdictional framework is intended to exclude from regulation “small (less than 1 acre) artificially- created, temporary features, such as tire ruts or other transient depressions caused by human activity” while still capturing smaller, naturally occurring features, such as seasonal wetlands and small vernal pools that may be outside federal jurisdiction. The Project Site has been graded and had spoils and debris dumped on it, and that is the likely reason water impounds. Therefore, the four (4) shallow depressions (totaling 0.16 acres) are not waters of the State and therefore would not be subject to regulation by the Regional Water Quality Control Board (RWQCB) per the Porter-Cologne Water Quality Control Act.

Given the size of the four shallow depressions on the Project Site (totaling 0.16 acre), regulatory permits are not required at this time, and impacts would be **less than significant**. No mitigation is required.

d. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

The Project Site is surrounded by paved roads and parking lots associated with residential and commercial development. Although common urban-adapted species such as raccoons move

through the site and birds may nest on the site, the site does not provide an important corridor for wildlife movement or a bird nursery site. Therefore, the Proposed Project would not impair the movement of wildlife species, and impacts would be **less than significant**. No mitigation is required.

e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

According to the Arborist Report prepared for the Proposed Project (**Appendix B**),¹⁸ 105 trees are located on site, six of which are considered protected native trees according to the City's Municipal Code. Because protected native trees would be removed, the Project Sponsor must obtain a native tree removal permit pursuant to City of Napa Municipal Code Chapters 12.45.080 and 12.45.090. By obtaining the permit and complying with its provisions, the Proposed Project would not conflict with the City's Native Tree Removal Ordinance, and impacts would be **less than significant**. No mitigation is required.

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

The Project Site is not located within an adopted Habitat Conservation Plan/Natural Community Conservation Plan (HCP/NCCP) or other approved local, regional, or state habitat conservation plan. As a result, **no impact** would occur and no mitigation is required.

¹⁸ Focal Point Arboriculture Consulting. 2025. *Arborist Report & Tree Inventory For the Project Proposed One-Story Building 1030 Kaiser Road City of Napa, CA*. June 5.

4.5 CULTURAL RESOURCES

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

4.5.1 Impact Analysis

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

The Project Site is vacant and undeveloped, and is covered primarily with soil stockpiles, ruderal vegetation, and scattered mature trees. No buildings or structures are present at the Project Site in historic-period aerial photos or as indicated on maps dating back to 1985.

On September 15, 2025, a records search to identify previously recorded prehistoric and historic cultural resources and cultural resource surveys within one (1) mile of the project area was conducted at the Northwest Information Center (NWIC) of the California Historical Resources Information System (CHRIS) at Sonoma State University. According to the NWIC records search, no cultural resources were recorded within the Project Site, although 15 cultural resources are documented within 0.5 miles of the Project Site.

Based on the background research conducted by LSA, it was determined that there are no known archaeological resources on the Project Site that would qualify as “historical resources” as defined under CEQA. Given that the Project Site is undeveloped and there are no existing structures at the Project Site to qualify as a “historical resource” as defined under CEQA, the Proposed Project would have a **less than significant impact** associated with a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the *State CEQA Guidelines*, and no mitigation is required.

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

Based on prior studies and previously documented cultural resources in the project vicinity, as well as the positive results of the Sacred Lands File (SLF) search, the project area is considered highly sensitive for cultural resources. Project implementation would include site clearing, mass grading, utility trenching, foundation work, paving, and vertical construction, which could adversely impact previously undiscovered archeological resources, and the impacts could be potentially significant.

In addition, the California Historic Resources Inventory System (CHRIS) records search from the NWIC identified 15 previously recorded cultural resources within 0.5 miles of the Project Site. CEQA California Code of Regulations, Title 14, Chapter 3, Sections 15064.5 (e and f) require a lead agency to establish protocols for the discovery of unknown archaeological resources. As such, the Proposed Project shall be required to implement **Mitigation Measures CUL-1 through CUL-3** in accordance with State law.

Mitigation Measure CUL-1

Unknown Discovery of Archaeological Resources. In the event that any deposit of archaeological materials is encountered during project construction activities, the construction contract shall ensure that all work within an appropriate buffer area around the discovery, but not less than 50 feet, shall be stopped and a qualified archaeologist meeting federal criteria under 36 Code of Federal Regulations (CFR) 61 shall be contacted to assess the find(s) and make recommendations.

In the event prehistoric or historic archaeological materials cannot be avoided by project activities, the City of Napa Community Resources and Development Department designee shall confirm that a qualified archaeologist was retained to evaluate the potential historic significance of the find(s).

All archaeological material unearthed by project construction activities shall be evaluated by qualified archaeologists. If the find(s) are determined not to be a historical resource pursuant to CEQA Guidelines Section 15064.5(a) or a unique archaeological resource pursuant to Public Resources Code Section 21083.2(g) by a qualified archaeologist and were not identified as a tribal cultural resource by a Native American representative, avoidance is not necessary.

If the find(s) are determined by the qualified archaeologist to be a historical resource or a unique archaeological resource, the resources shall be avoided if feasible, as directed by the qualified archaeologist or Native American Representative. If the City determines that avoidance is not feasible, project impacts shall be mitigated in accordance with the recommendations outlined in a data recovery plan as prepared by the qualified archaeologist, in coordination with the City of Napa Community Resources and Development Department, and in accordance with *State CEQA Guidelines* Section 15126.4 (b)(3)(C).

The data recovery plan shall include provisions for the adequate recovery of all scientifically consequential information from and about any discovered archaeological materials, and recommendations for the treatment of these resources. In-place preservation of the archaeological resource is the preferred method

for mitigating potential impacts, as it preserves the resource's relationship to its archaeological context. In-place preservation also reduces the potential for conflicts with the religious or cultural values of groups associated with the resource. Other mitigation options include, but are not limited to, the full or partial removal and curation of the resource.

The City of Napa Community Resources and Development Department shall confirm that the construction contractors have retained a qualified archaeologist to prepare and implement the data recovery plan, which shall be conducted prior to any additional earth-moving activities in the area of the resource. The recovery plan shall be submitted to the City of Napa Community Resources and Development Department. Once the recovery plan is reviewed and approved by the City of Napa Community Resources and Development Department, and any appropriate resource recovery is completed, project construction activity within the area of the find may resume. A data recovery plan shall not be required for resources that have been deemed by the qualified archaeologist, in coordination with the City of Napa Community Resources and Development Department, as adequately recorded and recovered by studies already completed as per *State CEQA Guidelines* Section 15126.4 (b)(3)(D). The qualified archaeologist shall determine the need for archaeological construction monitoring in the vicinity of the find thereafter.

Mitigation Measure CUL-2

Cultural Resources ALERT Sheet.¹⁹ Prior to initiation of ground-disturbing activities, the City shall confirm that the Project Sponsor has retained a Secretary of the Interior (SOI)-qualified archaeologist to prepare an Archaeological ALERT Sheet summarizing the known or potential presence of archaeological resources within the project area, submitted the ALERT Sheet to the City for review and approval, and distributed the approved ALERT Sheet to all construction personnel. The ALERT Sheet shall include, at a minimum:

- A brief overview of the project area's archaeological sensitivity and any known site records;
- A description of the types of materials that may be encountered during excavation or grading (e.g., flaked stone, groundstone, shell, bone, historic debris, foundations, or features);

¹⁹ ALERT refers to Avoidance, Long term protection, Education, Reporting, and Treatment.

- Color photographs of potential archaeological materials;
- Clear and concise instructions detailing the protocols to be followed upon the unanticipated discovery of archaeological resources or human remains, including, but not limited to, worker responsibilities, stop-work procedures, and notification requirements in the event of a discovery; and
- Contact information for the project's qualified archaeologist and City/Lead Agency staff.

The ALERT Sheet shall be distributed to all construction personnel prior to commencement of ground disturbance activities as part of the Worker Environmental Awareness (WEAP) training (refer to Mitigation Measure CUL-3). The on-site supervisor or contractor shall ensure that the ALERT Sheet remains on site and accessible to construction staff throughout the duration of all ground-disturbing phases of work.

Mitigation Measure CUL-3

Worker Environmental Awareness Program (WEAP). Immediately prior to commencement of any ground-disturbing activities, all construction personnel shall attend a WEAP training to be conducted by a Secretary of the Interior (SOI)-qualified archaeologist and, if required, a representative designated by the consulting Tribe(s). The training program materials shall be developed by a qualified archaeologist, in consultation with culturally affiliated Native American Tribes. The WEAP training shall include, at a minimum:

- A review of the cultural sensitivity of the project and the surrounding area and the contents of the ALERT Sheet;
- A discussion of what resources could potentially be identified during earthmoving activities;
- A discussion of the protocols and procedures that apply for the unanticipated discovery of cultural resources, including who to contact and appropriate avoidance measures until the find(s) can be properly evaluated.
- An overview of the legal requirements under the California Environmental Quality Act (CEQA), State Health and Safety Code Section 7050.5, and Public Resources Code 5097.98.

The WEAP training shall be mandatory, and all construction personnel must attend prior to beginning work on the Project Site.

The project sponsor's contractors shall maintain a log documenting attendance of all personnel. This attendance log for this training shall be sent to the City of Napa within 10 business days of the training. No construction personnel shall be permitted to participate in ground-disturbing activities until they have completed the WEAP training.

Implementation of **Mitigation Measures CUL-1 through CUL-3** would ensure that any previously unknown archaeological resources or human remains encountered during construction are properly identified, evaluated, and protected. These measures require immediate halting of work within at least 50 feet of a discovery, notification of a Secretary of the Interior (SOI)-qualified archaeologist, and evaluation of the find consistent with *State CEQA Guidelines* §15064.5 and PRC §21083.2. If resources cannot be avoided, the City would require preparation and implementation of a data recovery plan to recover scientifically important information for the Proposed Project. In addition, the Proposed Project must provide an Archaeological ALERT²⁰ Sheet to all construction personnel and conduct mandatory Worker Environmental Awareness Program (WEAP) training, including tribal participation where appropriate, to ensure proper field recognition and reporting procedures. Collectively, these measures would avoid or reduce potential impacts to archaeological resources through avoidance, documentation, or data recovery, ensuring that impacts would be **less than significant with mitigation incorporated**.

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

Disturbance of human remains interred outside of formal cemeteries would result in a significant impact. If human remains are identified during construction of improvements associated with the Proposed Project, Section 7050.5 of the California Health and Safety Code and Section 5097.98 of the PRC shall apply as appropriate. Because the SLF search returned positive results and the project area is highly sensitive for the potential presence of Native American cultural resources, there is a possibility that human remains could be encountered during ground-disturbing activities. Such disturbance would constitute a potentially significant impact and, as such, **Mitigation Measure CUL-4** regarding the treatment of human remains would be required.

Mitigation Measure CUL-4

Accidental Discovery, Human Remains. If human remains are encountered on the Project Site, work within 50 feet of the discovery shall be redirected and the County Coroner shall be notified immediately, consistent with the requirements of California Code of Regulations (CCR) Section 15064.5(e). State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code (PRC) Section 5097.98.

²⁰ ALERT refers to Avoidance, Long term protection, Education, Reporting, and Treatment.

If the remains are determined to be Native American, the County Coroner shall notify the Native American Heritage Commission (NAHC), which shall determine and notify a Most Likely Descendant (MLD). With the property owner's permission, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification by the NAHC.

If human remains are determined to be Native American, the MLD, in coordination with consulting Tribal representative(s) identified by the NAHC, shall have lead authority to recommend treatment. Consistent with CCR Section 15064.5(d), if the remains are determined to be Native American and an MLD is notified, the City of Napa shall consult with the MLD as identified by the NAHC to develop an agreement for treatment and disposition of the remains.

There shall be no scientific removal, pictures taken, or invasive testing done on the Native American human remains or associated funerary objects without the express written consent of the MLD and the consulting Tribe(s). All bone, if not identifiable as human or animal, shall be treated as human remains, and the appropriate protocols followed. Tribal representatives and the MLD, in consultation with the City of Napa Community Resources and Development Department and a qualified archaeologist as necessary, shall determine reburial procedures for the Native American human remains and associated funerary objects with the appropriate dignity. Reburial shall occur at a location agreed upon by the consulting Tribe(s) and the property owner that preserves access for descendant communities in perpetuity and avoids future disturbance. Records identifying tribal cultural resource locations shall be kept confidential, consistent with PRC § 5097.9 and other applicable law.

Prior to the issuance of grading permits, the City of Napa Community Resources and Development Department designee shall verify that all grading plans specify the requirements of CCR Section 15064.5(e), State Health and Safety Code Section 7050.5, and PRC Section 5097.98, as stated above.

Mitigation Measure CUL-4 requires that if human remains are inadvertently uncovered during construction, all work within 50 feet of the discovery must halt and the County Coroner must be notified immediately, consistent with CEQA and State law. If the remains are identified as Native American, the Coroner must contact the NAHC, which would designate a Most Likely Descendant (MLD) to determine appropriate treatment and disposition. The City must ensure that grading plans include these requirements prior to permit issuance. With the incorporation of **Mitigation Measure CUL-4**, project impacts would be **less than significant with mitigation incorporated**.

4.6 ENERGY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?	☐	☐	☒	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

4.6.1 Impact Analysis

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

The Proposed Project would result in a small increase in the demand for electricity and fuel use. The discussion and analysis provided below is based on data included in the California Emissions Estimator Model (CalEEMod) output, which is included in **Appendix A1**.

Construction-Period Energy Use. The anticipated construction schedule assumes that the Proposed Project would be built over approximately 14 months. The Proposed Project would require grading, site preparation, and building activities during construction.

Construction of the Proposed Project would require energy for the manufacture and transportation of construction materials, preparation of the site for grading activities, and construction of the industrial building. Petroleum fuels (e.g., diesel and gasoline) would be the primary sources of energy for these activities. In order to increase energy efficiency on the site during Project construction, the idling times for construction vehicles would be restricted to 5 minutes or less and construction workers would be required to shut off idle equipment, as required by **Mitigation Measure AIR-1**. In addition, construction activities are not anticipated to result in inefficient use of energy, as gasoline and diesel fuel would be supplied by construction contractors who would conserve the use of their supplies to minimize their costs on the project. Energy usage on the Project Site during construction would be temporary in nature and would be relatively small in comparison to the State's available energy sources. Therefore, construction energy impacts would be **less than significant**.

Operational Energy Use. Operation of the Proposed Project would require the consumption of electricity and fuel use associated with operational vehicle trips. Energy consumption was estimated for the Proposed Project using default energy intensities by land use type in CalEEMod. The Proposed Project would not utilize natural gas, and no natural gas demand is anticipated during Project operation. In addition, the Proposed Project would also result in diesel usage associated with the fire pump; however, the fire pump is only expected to run approximately 26 hours annually,

based on a 30-minute weekly testing cycle. Therefore, use of the fire pump is not expected to substantially increase diesel fuel usage and is not evaluated further.

In addition, the Proposed Project would result in energy usage associated with gasoline to fuel project-related trips. The average fuel economy for light-duty vehicles (autos, pickups, vans, and SUVs) in the United States has steadily increased from about 14.9 miles per gallon (mpg) in 1980 to 22.6 mpg in 2023.²¹ The average fuel economy for heavy-duty trucks in the United States has also steadily increased, from 5.7 mpg in 2013 to a projected 8.9 mpg in 2026.²² Fuel use associated with vehicle and truck trips generated by the Proposed Project was calculated based on the project's trip generation described in Section 4.17, Transportation, which identifies that the Proposed Project would generate approximately 411 average daily trips. The amount of operational fuel use was estimated using CARB's EMFAC2021 model, which provided projections for typical daily fuel usage in Napa County.

Table 4.6.A, below, shows the estimated potential increased energy usage associated with the Proposed Project.

Table 4.6.A: Estimated Annual Energy Use of Proposed Project

	Electricity Use (kWh/yr)	Natural Gas Use (kBtu/yr)	Gasoline (gal/yr)	Diesel (gal/yr)
Proposed Project	2,117,551	0	53,067	35,191

Source: Compiled by LSA (May 2026).

gal/yr = gallons per year

kBtu/yr = thousand British thermal units per year

kWh/yr = kilowatt-hours per year

As shown in Table 4.6.A, the estimated increase in electricity demand associated with the operation of the Proposed Project would be 2,117,551 kilowatt-hours (kWh) per year. Total electricity consumption in Napa County in 2024 was 1,053,500,000 kWh;²³ therefore, operation of the Proposed Project would negligibly increase the annual electricity consumption in Napa County by approximately 0.2 percent.

The Proposed Project would also result in energy usage associated with motor vehicle gasoline to power project-related trips. As shown above in Table 4.6.A, the Proposed Project would result in the consumption of 53,067 gallons of gasoline and 35,191 gallons of diesel per year. Based on fuel consumption obtained from EMFAC2021, approximately 47.2 million gallons of gasoline and approximately 12.1 million gallons of diesel will be consumed from vehicle trips in Napa County in 2027 (project's opening year). Therefore, vehicle trips associated with the Proposed Project would

²¹ United States Department of Transportation (USDOT). 2025. "Table 4-23: Average Fuel Efficiency of U.S. Light Duty Vehicles." Website: <https://www.bts.gov/content/average-fuel-efficiency-us-light-duty-vehicles> (accessed February 2026).

²² California Energy Commission (CEC). 2015. "Medium and Heavy-Duty Truck Prices and Fuel Economy 2013–2026." September.

²³ California Energy Commission (CEC). 2024. Electricity Consumption. Website: <https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/california-energy-consumption-dashboards-0> (accessed February 2026).

increase the annual fuel use in Napa County by approximately 0.0011 percent for gasoline fuel usage and approximately 0.0029 percent for diesel fuel usage. The Proposed Project would result in fuel usage that is a small fraction of current annual fuel usage in Napa County, and fuel consumption associated with vehicle trips generated by project operations would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region. Therefore, gasoline demand generated by vehicle trips associated with the Proposed Project would be a minimal fraction of gasoline and diesel fuel consumption in California.

Furthermore, the Proposed Project would be constructed using energy efficient modern building materials and construction practices, and would also use new modern appliances and equipment, in accordance with the Appliance Efficiency Regulations (CCR Title 24, Sections 1601 through 1608). In addition, the Proposed Project would include energy efficiency features such as heat reflecting roof membranes, a roof structure adequate to support photovoltaic (solar) panel systems, and the overall project design and construction guided by a Leadership in Energy and Environmental Design (LEED)-accredited architect familiar with sustainable building practices. The expected energy consumption during construction and operation of the Proposed Project would be consistent with typical usage rates for industrial uses; however, energy consumption is largely a function of personal choice and the physical structure and layout of buildings.

Pacific Gas and Electric Company (PG&E) is the private utility that would supply the Proposed Project's electricity and natural gas services. In 2022, approximately 40 percent of PG&E's delivered electricity came from renewable sources, including solar, wind, geothermal, small hydroelectric, and various forms of bioenergy.²⁴ PG&E reached California's 2020 renewable energy goal in 2017 and is positioned to meet the State's 60 percent by 2030 renewable energy mandate set forth in Senate Bill (SB) 100. In addition, PG&E plans to continue to provide reliable service to its customers and upgrade its distribution systems as necessary to meet future demand.

As such, the Proposed Project would not result in a potential significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. Impacts would be **less than significant**, and no mitigation is required.

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

In 2002, the State Legislature passed Senate Bill (SB) 1389, which required the California Energy Commission (CEC) to develop an integrated energy plan every 2 years for electricity, natural gas, and transportation fuels for the California Energy Policy Report. The plan calls for the State to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies several strategies, including assistance to public agencies and fleet operators in implementing incentive programs for zero emission vehicles and their infrastructure

²⁴ Pacific Gas & Electric Company (PG&E). 2023. *Exploring Clean Energy Solutions*. Website: <https://www.pge.com/en/about/corporate-responsibility-and-sustainability/taking-responsibility/clean-energy-solutions.html> (accessed February 2026).

needs, and encouragement of urban designs that reduce VMT and accommodate pedestrian and bicycle access.

The most recently adopted CEC energy report is the *2024 Integrated Energy Policy Report Update*.²⁵ The *2024 Integrated Energy Policy Report Update* provides the results of the CEC's assessments of a variety of energy issues facing California. Many of these issues will require action if the State is to meet its climate, energy, air quality, and other environmental goals while maintaining energy reliability and controlling costs. The 2024 Integrated Energy Policy Report Update covers a broad range of topics, including implementation of Senate Bill 350, integrated resource planning, distributed energy resources, transportation electrification, solutions to increase resiliency in the electricity sector, energy efficiency barriers faced by disadvantaged communities, demand response, transmission and landscape-scale planning, the California Energy Demand Preliminary Forecast, the preliminary transportation energy demand forecast, renewable gas (in response to Senate Bill 1383), updates on Southern California electricity reliability, natural gas outlook, and climate adaptation and resiliency.

As indicated above, energy usage on the Project Site during construction would be temporary in nature. In addition, energy usage associated with operation of the Proposed Project would be relatively small in comparison to the State's available energy sources and energy impacts would be negligible at the regional level. Because California's energy conservation planning actions are conducted at a regional level, and because the Proposed Project's total impact on regional energy supplies would be minor, the Proposed Project would not conflict with California's energy conservation plans as described in the CEC *2024 Integrated Energy Policy Report Update*. Therefore, the Proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and this impact would be **less than significant**. No mitigation is required.

²⁵ CEC. 2024. *2024 Integrated Energy Policy Report*. California Energy Commission. Docket Number: 24-IEPR-01.

4.7 GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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.	☐	☐	☒	☐
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☒	☐
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

The information and analysis in this section is based, in part, on the Geotechnical Engineering Report (Geotechnical Report)²⁶ (**Appendix C**) prepared for the Proposed Project by Raney Geotechnical Inc and dated February 21, 2025.

4.7.1 Impact Analysis

The California Geological Survey (CGS) mapped Seismic Hazard Zones that delineate areas susceptible to geologic hazards, including earthquakes, liquefaction, and landslides. These zones require additional investigation to determine the extent and magnitude of potential ground failure. According to the CGS, the Project Site is located within a Seismic Hazard Zone Unevaluated Area.²⁷ As such, a project-specific geotechnical evaluation has been prepared for the Proposed Project.

The City of Napa has adopted the 2025 California Building Code (Title 24, California Code of Regulations), with local amendments, which impose stringent construction requirements on projects

²⁶ Raney Geotechnical Inc. 2025. *Geotechnical Engineering Report, 1030 Kaiser Road Warehouse*. February 21.

²⁷ California Geological Survey (CGS). 2021. *Earthquake Zones of Required Investigation*. September 23. Website: <https://maps.conservation.ca.gov/cgs/EQZApp/app/> (accessed January 29, 2026).

in areas of high seismic risk.²⁸ The design and construction of the Proposed Project is required to conform with, or exceed, current best standards for earthquake-resistant construction in accordance with the 2025 California Building Code (CBC; or more recent applicable code) and with the generally accepted standards of geotechnical practice for seismic design in Northern California.

a. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Fault-rupture hazard is the hazard of ground breakage and displacement along fault traces during earthquakes. Fault rupture is generally expected to occur along active fault traces that have exhibited signs of recent geological movement (i.e., within the past 11,000 years). Alquist-Priolo Earthquake Fault Zones delineate areas around active faults with potential surface fault rupture hazards that would require specific geological investigations prior to approval of certain types of development within the delineated area.

The West Napa fault is approximately 1.50 miles northwest of the Project Site, and the nearest southerly edge of this fault's mapped Alquist-Priolo Fault Zone is approximately 0.95 miles east of the Project Site.²⁹ Therefore, although the Project Site is located in a seismically active region, it is not within an Alquist-Priolo Zone, and implementation of the project would not, directly or indirectly, cause substantial adverse effects related to fault rupture. Impacts associated with fault rupture would be **less than significant**, and no mitigation is required.

ii. Strong seismic ground shaking?

Seismic shaking (or ground shaking) is a general term referring to all aspects of motion of the earth's surface resulting from an earthquake and is normally the major cause of damage in seismic events. The extent of ground shaking is determined by the earthquake's magnitude and intensity, the distance from the epicenter, and local geologic conditions. The Association of Bay Area Governments (ABAG) has developed an Earthquake Shaking Scenarios Hazard Viewer that offers 16 unique shaking scenarios and identifies the earthquake fault segment that contributes most to each area's seismic shaking risk.³⁰ According to this tool, the Project Site would experience strong shaking

²⁸ City of Napa. 2025. *City of Napa Municipal Code, Title 15 Buildings and Construction, Chapter 15.04 Building Standards and Regulations, Section 15.04.020*. Website: <https://ecode360.com/43395872#43395964> (accessed January 29, 2026).

²⁹ Department of Conservation. n.d. *California Geological Survey Earthquake Zones of Required Investigation*. Website: <https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/> (accessed January 29, 2026).

³⁰ Association of Bay Area Governments. 2023. *Earthquake Shaking Scenarios MTC/ABAG Hazard Viewer Map*. Website: <https://mtc.maps.arcgis.com/apps/webappviewer/index.html?id=4a6f3f1259df42eab29b35dfcd086fc8> (accessed January 29, 2026).

(Modified Mercalli Intensity [MMI] 6.4) from the Northern San Andreas Fault, and severe shaking (MMI 8.0) from the West Napa fault.³¹ During the 2014 South Napa Earthquake, there was strong ground shaking along the West Napa Fault and in the Napa Valley. Many older buildings were damaged by the ground shaking, and damage occurred in the regional area as far north as Yountville, and as far south as Vallejo.³²

The risk of ground shaking impacts is reduced by adherence to the design and materials standards set forth in the 2025 California Building Code (CBC). Construction and development of the project would be required to comply with applicable provisions of the CBC, consistent with State law, which requires that the design and construction of new structures comply with CBC requirements addressing general geologic, seismic (including ground shaking), and soil constraints for new buildings. Additionally, the Proposed Project would comply with the City's Design and Improvement Standards related to geology and soils as described in Municipal Code Sections 16.36.200 and 17.52.420(e),³³ which requires the preparation of and adherence to a project-specific soils investigation and geotechnical report.

The site-specific geotechnical report (**Appendix C**) prepared for the Proposed Project provided grading and construction recommendations for the Proposed Project's design and construction in conformance with the 2022 CBC requirements. It is acknowledged that seismic hazards cannot be eliminated, even with site-specific geotechnical design and advanced building practices. However, the seismic design standards of the 2022 CBC are intended to prevent catastrophic building failure in the most severe earthquakes currently anticipated. Therefore, compliance with the 2022 CBC, the City's Design and Improvement Standards, and the recommendations in the geotechnical report would ensure that potential impacts associated with ground shaking would be **less than significant**. No mitigation is required.

iii. Seismic-related ground failure, including liquefaction?

Soil liquefaction is a phenomenon primarily associated with saturated soil layers located close to the ground surface. These soils lose strength during ground shaking and may move both horizontally and vertically. In areas where sloping ground or open slope faces are present, this mobility can result in lateral spreading. Soils that are most susceptible to liquefaction are clean, loose, uniformly graded, saturated, fine-grained sands that are relatively close to the ground surface. However, loose sands that contain a significant amount of fines (silt and clay) may also liquefy.

³¹ Association of Bay Area Governments (ABAG). 2023. *Earthquake Shaking Scenarios MTC/ABAG Hazard Viewer Map*. Website: <https://mtc.maps.arcgis.com/apps/webappviewer/index.html?id=4a6f3f1259df42eab29b35dfcd086fc8> (accessed January 29, 2026).

³² City of Napa. 2022b. *City of Napa General Plan Update Partial Recirculated Draft Environmental Impact Report (SCH #2021010255)*, Pg. 3.6-9 Website: <https://www.cityofnapa.org/DocumentCenter/View/10031/Draft-EIR-and-Partial-Recirculated-DEIR-PDF> (accessed January 29, 2026).

³³ City of Napa. 2025. *City of Napa Municipal Code, Title 16 Subdivisions, Chapter 16.36 Design and Improvement Standards, Section 16.36.200*. Website: <https://ecode360.com/43395872#43395964> (accessed January 29, 2026).

According to the CGS, the Project Site has not been evaluated for liquefaction hazards.³⁴ As detailed in the Geotechnical Report prepared for the Proposed Project, the soil materials encountered within the Project Site generally consist of brown silty sand with varying amounts of clay, silt, and sand. Therefore, the Geotechnical Report included a liquefaction analysis to determine liquefaction potential. According to the site-specific liquefaction analysis, the liquefaction potential index for the Project Site is very low during the design seismic event.³⁵ Therefore, the Project Site would not be susceptible to liquefaction, and impacts would be **less than significant**. No mitigation is required.

iv. Landslides?

The Project Site is relatively flat with elevations ranging from 12 to 23 feet and slopes slightly downward from north to south. According to the CGS, the Project Site has not been evaluated for landslide hazards.³⁶ In addition, most of the city is mapped as flat and is not susceptible to landslides. Regional landslide mapping indicates only one (1) area of predicted debris flow and landslides near Foster Road, approximately 1.5 miles northwest of the Project Site.³⁷ Therefore, the Proposed Project would have a **less than significant** impact related to landslides. No mitigation is required.

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

Soil erosion, which is discussed in detail in Section 4.10, Hydrology and Water Quality, could occur during project grading and construction, which could result in temporary soil erosion when the disturbed soils are exposed to wind or rainfall. As discussed in Section 4.10, because construction of the Proposed Project would involve over 1 acre of land disturbance, construction would be required to comply with the California State Water Resources Control Board (SWRCB) Construction Stormwater General Permit (CGP)³⁸, which requires the preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP). Consistent with CGP requirements, the SWPPP would include erosion control Best Management Practices (BMPs) that would minimize erosion during construction.

Upon completion of construction, the Project Site would contain structures, pavement, landscaping, and bioretention basins. After implementation of the Proposed Project, the pervious surface area

³⁴ California Geological Survey (CGS). 2021. *Earthquake Zones of Required Investigation*. September 23. Website: <https://maps.conservation.ca.gov/cgs/EQZApp/app/> (accessed January 29, 2026).

³⁵ Raney Geotechnical Inc. 2025. *Geotechnical Engineering Report, 1030 Kaiser Road Warehouse*. Page 8. February 21.

³⁶ California Geological Survey (CGS). 2021. *Earthquake Zones of Required Investigation*. September 23. Website: <https://maps.conservation.ca.gov/cgs/EQZApp/app/> (accessed January 29, 2026).

³⁷ City of Napa. 2022b. *City of Napa General Plan Update Partial Recirculated Draft Environmental Impact Report (SCH #2021010255)*, Figure 3.6-2 Seismic Hazards in the Planning Area. Website: <https://www.cityofnapa.org/DocumentCenter/View/10031/Draft-EIR-and-Partial-Recirculated-DEIR-PDF> (accessed January 29, 2026).

³⁸ State Water Resources Control Board (SWRCB). 2022. National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities, Order No. 2022-0057-DWQ, NPDES No. CAS000002. September 8. Effective September 1, 2023.

(landscaped areas and bioretention basins) would minimize on-site erosion by stabilizing the soil. Therefore, on-site erosion impacts would be minimal. Additionally, compliance with the Municipal Regional Permit (MRP), as outlined in Section 4.10, including the construction of the bioretention basins, would minimize on- and off-site erosion impacts during project operation, and impacts would be **less than significant**. No mitigation is required.

c. Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

As discussed in Section 4.7.1.a, on-site soils would not be subject to liquefaction or landslide hazards because the project area is not susceptible to liquefaction or landslide hazards. In addition, the Proposed Project's compliance with existing regulations and the geotechnical recommendations in the Geotechnical Report, as required by the City's Municipal Code Sections 16.36.200 and 15.04.010, would reduce potential risks to people and structures. Final grading, foundation, and building plans would also be designed in accordance with the 2025 CBC (or more recent applicable code) and Geotechnical Report recommendations. Therefore, compliance with the existing regulations would ensure that the potential impacts associated with potential landslide and liquefaction would be **less than significant**.

Lateral spreading is a form of horizontal displacement of soil toward an open channel or other "free" face, such as an excavation boundary. In a lateral spread failure, a layer of ground at the surface is carried on an underlying layer of liquefied material over a nearly flat surface toward a river channel or other bank. The lateral spreading hazard tends to mirror the liquefaction hazard for a site. Because the Project Site is not susceptible to liquefaction, the potential for seismically induced lateral spreading is low. Therefore, the Project Site would not be susceptible to lateral spreading, and a **less than significant** impact would occur.

Subsidence can result from the removal of subsurface water, resulting in either gradual depression or catastrophic collapse of the ground surface. As detailed in the Geotechnical Report completed for the Proposed Project, groundwater was encountered between seven (7) and 18 feet below ground surface (bgs) at the borings and Cone Penetration Testing (CPT) locations completed as part of the exploration. Review of historical groundwater data indicated that groundwater could be as high as five (5) feet bgs at the Project Site. Therefore, dewatering may be required in isolated areas of the Project Site during construction. Any dewatering would be temporary, localized, and would not result in the lowering of surrounding groundwater levels. Additionally, if groundwater is encountered during construction and groundwater dewatering is necessary, the Proposed Project would implement the recommendations provided in the Geotechnical Report, which would ensure that any groundwater dewatering during excavation would be conducted in accordance with the requirements of the CGP and recommendations of the Geotechnical Report prepared for the Proposed Project. Therefore, the Proposed Project would have a **less-than-significant** impact related to subsidence.

As detailed in the Geotechnical Report, the Project Site soils consist of non-liquefiable soil layers overlying and interbedded within liquefiable layers. The interbedded layers would likely lower the potential of seismically induced settlement at the ground surface. Therefore, the Geotechnical

Report concluded that seismic settlement would be negligible, and a **less than significant** impact related to unstable soils and collapse would occur.

Overall, the Proposed Project is located in an area not susceptible to liquefaction or landslides. Compliance with the 2025 CBC, the City's Standard Specifications, and the recommendations in the geotechnical report would ensure that potential impacts associated with unstable soils would be **less than significant**. No mitigation is required.

d. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Expansive soils are characterized by the potential for shrinking and swelling as the moisture content of the soil decreases and increases, respectively. Shrink-swell potential is influenced by the amount and type of clay minerals present and can be measured by the percentage of change in the soil volume. As detailed in the Geotechnical Report, laboratory tests conducted on near-surface clays indicate low to moderate expansion potential and medium plasticity indexes. Based on these laboratory test results, the Geotechnical Report concludes that native clays on the Project Site are capable of exerting expansion pressures on foundations, interior floor slabs, and exterior flatwork, resulting in potentially significant impacts. As such, the project-specific Geotechnical Report recommends chemical treatment of clay soils, and 12 inches of imported, compactable, non-expansive soils or aggregate base beneath interior slabs-on-grade and exterior flatwork. Therefore, compliance with the recommendations in the Geotechnical Report would ensure that potential impacts associated with expansive soil would be **less than significant**. No mitigation is required.

e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

Development of the Proposed Project would not involve the use of septic tanks or alternative wastewater disposal systems, as the Proposed Project would connect to existing wastewater infrastructure in the surrounding area. Therefore, the Proposed Project would have **no impact** related to septic tanks or alternative wastewater disposal systems. No mitigation is required.

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

According to the City of Napa General Plan EIR, most of the city is underlain by Holocene alluvium and alluvial fan deposits that are likely too young to contain fossils. Given the young age of these deposits and the degree to which they have been disturbed by cultivation and construction, fossils are not likely to occur in the upper 3 feet of Holocene sediments. Additionally, there are no records of paleontological resources found in Holocene deposits in Napa County.³⁹ However, the possibility of accidental discovery of paleontological resources during project grading, excavation, and

³⁹ City of Napa. 2022b. *City of Napa General Plan Update Draft Environmental Impact Report*, Pg 3.6-16. March. Website: <https://www.cityofnapa.org/DocumentCenter/View/10031/Draft-EIR-and-Partial-Recirculated-DEIR-PDF> (accessed January 29, 2026).

construction activities cannot be discounted. As such, the Proposed Project would be required to implement **Mitigation Measure GEO-1**, as described below, if paleontological resources are discovered during project construction.

Mitigation Measure GEO-1

Discovery of Paleontological Resources. Should paleontological resources be encountered during project subsurface construction activities, all ground-disturbing activities within 50 feet shall be redirected, and a qualified paleontologist shall be contacted to assess the situation, consult with agencies as appropriate, and recommend treatment of the discovery. For purposes of this mitigation, a “qualified paleontologist” shall be an individual with the following qualifications: (1) a graduate degree in paleontology or geology and/or a person with a demonstrated publication record in peer-reviewed paleontological journals; (2) at least 2 years of professional experience related to paleontology; (3) proficiency in recognizing fossils in the field and determining their significance; (4) expertise in local geology, stratigraphy, and biostratigraphy; and (5) experience collecting vertebrate fossils in the field. If the paleontological resources are found to be significant and project activities cannot avoid them, measures shall be implemented to ensure that the project does not cause a substantial adverse change in the significance of those resources. Measures may include monitoring, recording the fossil locality, data recovery and analysis, a final report, and accessioning the fossil material and technical report to a paleontological repository. Upon completion of the assessment, a report documenting methods, findings, and recommendations shall be prepared and submitted to the City of Napa Community Resources and Development Department for review. If paleontological materials are recovered, this report shall also be submitted to a paleontological repository, such as the University of California Museum of Paleontology, along with significant paleontological materials. Public educational outreach may also be appropriate.

The project sponsor shall inform its contractor(s) of the sensitivity of the Project Site for paleontological resources and shall verify that the following directive has been included in the project grading plans:

“The subsurface of the construction site may be sensitive for fossils. If fossils are encountered during project subsurface construction, all ground-disturbing activities within 50 feet shall be redirected and a qualified paleontologist contacted to assess the situation, consult with agencies as appropriate, and make recommendations for the treatment of the discovery. Project personnel shall not collect or

move any paleontological materials. Fossils can include plants and animals, as well as trace-fossil evidence of past life, such as tracks or plant imprints. Ancient marine sediments may contain invertebrate fossils such as snails, clam and oyster shells, sponges, protozoa, and vertebrate fossils such as fish, whale, and sea lion bones. Contractor acknowledges and understands that excavation or removal of paleontological material is prohibited by law and constitutes a misdemeanor under California Public Resources Code, Section 5097.5."

Implementation of **Mitigation Measure GEO-1** would require that paleontological resources are properly handled and assessed upon discovery during project subsurface construction. Therefore, impacts from the discovery of paleontological resources would be reduced to **less than significant with mitigation incorporated**.

4.8 GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Greenhouse gases (GHGs) are present in the atmosphere naturally, are released by natural sources, or are formed from secondary reactions taking place in the atmosphere. The gases that are widely seen as the principal contributors to human-induced global climate change are:

- Carbon dioxide (CO₂);
- Methane (CH₄);
- Nitrous oxide (N₂O);
- Hydrofluorocarbons (HFCs);
- Perfluorocarbons (PFCs); and
- Sulfur Hexafluoride (SF₆).

Over the last 200 years, humans have caused substantial quantities of GHGs to be released into the atmosphere. These extra emissions are increasing GHG concentrations in the atmosphere and enhancing the natural greenhouse effect, believed to be causing global warming. While GHGs include naturally occurring GHGs such as CO₂, methane, and N₂O, some gases, like HFCs, PFCs, and SF₆ are not naturally occurring, and therefore completely new to the atmosphere.

Certain gases, such as water vapor, are short-lived in the atmosphere. Others remain in the atmosphere for significant periods of time, contributing to climate change in the long term. Water vapor is excluded from the list of GHGs above because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

These gases vary considerably in terms of Global Warming Potential (GWP), a concept developed to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The GWP scale is based on several factors, including the relative effectiveness of a gas to absorb infrared radiation and length of time that the gas remains in the atmosphere ("atmospheric lifetime"). The GWP of each gas is measured relative to CO₂, the most abundant GHG. The GWP for a particular GHG is calculated using the ratio of heat trapped by one unit mass of the GHG to the ratio of heat trapped by one unit mass of CO₂ over a specified period. GHG emissions are typically measured in terms of pounds or tons of "CO₂ equivalents" (CO₂e).

4.8.1 Impact Analysis

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

The Bay Area Air District (Air District) 2022 CEQA Guidelines identify applicable GHG significance thresholds⁴⁰. The Air District recommends these thresholds of significance for use in determining whether a proposed project will have a significant impact related to climate change. These thresholds evaluate a project based on its effect on California's efforts to meet the State's long-term climate goals. Applying this approach, the Air District identifies and provides supporting documentation, outlining the requirements for new land use development projects necessary to achieve California's long-term climate goal of carbon neutrality by 2045. Based on their analysis, the Air District found that new land use development projects need to incorporate design elements to do its "fair share" to implement the goal of carbon neutrality by 2045. If a project is designed and built to incorporate the identified design elements, then it will contribute its portion of what is necessary to achieve California's long-term climate goals—its "fair share"—and an agency reviewing the project under CEQA can conclude that the project will not make a cumulatively considerable contribution to global climate change. The document concludes that if a project does not incorporate these design elements, then it should be found to make a significant climate impact because it will hinder California's efforts to address climate change.

According to the Air District, a project would have a less than significant impact related to GHG emissions if it would:

- a. Include, at a minimum, the following project design elements:
- 1) Buildings
 - a) The project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development).
 - b) The project will not result in any wasteful, inefficient, or unnecessary electrical usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines.
 - 2) Transportation
 - a) Achieve a reduction in project-generated vehicle miles traveled (VMT) below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted Senate Bill (SB) 743 VMT target, reflecting the recommendations provided in the Governor's Office of Planning and Research's Technical Advisory on Evaluating Transportation Impacts in CEQA:
 - (1) Residential projects: 15 percent below the existing VMT per capita

⁴⁰ Bay Area Air District (Air District). 2023. *California Environmental Quality Act Air Quality Guidelines*. April.

- (2) Office projects: 15 percent below the existing VMT per employee
- (3) Retail projects: no net increase in existing VMT
- b) Achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.
- b. Or be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b).

These project design elements are utilized in the following analysis as the thresholds of significance to evaluate the project's potential GHG emissions impact. The Proposed Project is also evaluated for consistency with AB 1279 and the CARB 2022 Scoping Plan.

Construction GHG Emissions. Construction activities associated with the Proposed Project would produce combustion emissions from various sources. During construction, GHGs would be emitted through the operation of construction equipment and from worker and builder supply vendor vehicles, each of which typically use fossil-based fuels to operate. The combustion of fossil-based fuels creates GHGs such as CO₂, CH₄, and N₂O. Furthermore, CH₄ is emitted during the fueling of heavy equipment. Exhaust emissions from on-site construction activities would vary daily as construction activity levels change.

The Air District does not have an adopted threshold of significance for construction-related GHG emissions. However, lead agencies are encouraged to quantify and disclose GHG emissions that would occur during construction. Using CalEEMod, it is estimated that construction of the Proposed Project would generate approximately 592.9 MT CO₂e. Construction GHG emissions were amortized over the life of the project (assumed to be 30 years) and added to the operational emissions. When annualized over the life of the project, amortized construction emissions would be approximately 19.8 MT CO₂e per year. GHG emissions generated during construction of the Proposed Project would be short term in nature, lasting only for the duration of the construction period, and would not represent a long-term source of GHG emissions.

Operational GHG Emissions Long-term GHG emissions are typically generated from mobile sources (e.g., passenger cars and trucks), area sources (e.g., maintenance activities and landscaping), stationary sources (e.g., diesel fire pump), indirect emissions from sources associated with energy consumption, waste sources (land filling and waste disposal), and water sources (water supply and conveyance, treatment, and distribution). Mobile-source GHG emissions would include project-generated vehicle and truck trips to and from the Project Site. Area-source emissions would be associated with activities such as landscaping and maintenance on the Project Site. Stationary sources would be associated with the use of the 215-horsepower diesel fire pump. Waste source emissions generated by the Proposed Project include energy generated by land filling and other methods of disposal related to transporting and managing project-generated waste.

Following guidance from the Air District, GHG emissions for the operation of the project were calculated using CalEEMod. Based on the analysis results, summarized in Table 4.8.A, the Proposed Project would result in emissions of approximately 866.4 MT CO₂e per year. These estimated

emissions are provided for informational purposes, and the significance of the Proposed Project is further analyzed below.

Table 4.8.A: Project Greenhouse Gas Emissions

Emission Type	Operational Emissions (metric tons per year)			
	CO ₂	CH ₄	N ₂ O	CO ₂ e
Mobile Sources	541.6	<0.1	<0.1	551.4
Area Sources	2.2	<0.1	<0.1	2.2
Energy Sources	195.9	<0.1	<0.1	197.9
Water Sources	31.9	1.1	<0.1	67.8
Waste Sources	12.8	1.3	0.0	44.9
Stationary Sources	2.1	<0.1	<0.1	2.1
Amortized Construction Emissions				19.8
Total Operational Emissions				866.4

Source: Compiled by LSA (May 2026).

CH₄ = methane

CO₂ = carbon dioxide

CO₂e = carbon dioxide equivalent

N₂O = nitrous oxide

Per the significance thresholds described above, a less than significant GHG impact would occur if the project were consistent with the identified design standards.

Natural Gas Usage. According to the Air District, a less than significant GHG impact would occur if the project would not include natural gas appliances or natural gas plumbing. The Proposed Project would not include the use of natural gas appliances or plumbing. Therefore, the Proposed Project would be consistent with this design element.

Energy Usage. The project must not result in any wasteful, inefficient, or unnecessary energy usage as determined by the analysis required under Section 21100(b)(3) and Section 15126.2(b) of the *State CEQA Guidelines*. Energy use consumed by the Proposed Project would be associated with electricity consumption and fuel used for vehicle trips associated with the project.

As described in Section 4.6, Energy, the estimated increase in electricity demand associated with the operation of the Proposed Project would be 2,117,551 kWh per year. Total electricity consumption in Napa County in 2024 was 1,053,500,000 kWh;⁴¹ therefore, operation of the Proposed Project would negligibly increase the annual electricity consumption in Napa County by approximately 0.002 percent.

In addition, the Proposed Project would be constructed to current Title 24 standards, which would require energy-saving building features. As such, based on this analysis, as required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the *State CEQA Guidelines*, the Proposed Project would not result in the wasteful, inefficient, or unnecessary consumption of fuel or energy and would incorporate renewable energy and energy efficiency measures into the building design,

⁴¹ California Energy Commission (CEC). 2024. Electricity Consumption. Website: <https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/california-energy-consumption-dashboards-0> (accessed February 2026).

equipment use, and transportation. As such, the Proposed Project would be consistent with this design element.

Vehicle Miles Traveled. To meet the Air District's VMT threshold, the project must achieve a reduction in project-generated VMT below the regional average consistent with the current version of the California Climate Change Scoping Plan or meet a locally adopted SB 743 VMT target, reflecting the recommendations provided in the Governor's Office of Planning and Research's 2018 *Technical Advisory on Evaluating Transportation Impacts in CEQA*. As discussed in Section 4.17, Transportation, a detailed VMT analysis was not required for the Proposed Project; therefore, it is not expected that the Proposed Project would have a significant VMT impact. Further, the Proposed Project would include the installation of 12 EV charging stations and would include bicycle parking facilities would be installed near the primary building entrances. In addition, the Proposed Project is located within a 0.5-mile radius of several bus stops (e.g., Route 11 G) along Kaiser Road and Napa Valley Corporate Drive that are serviced by the Napa Valley Transportation Authority (NVTa). Therefore, the Proposed Project, which would facilitate the use of transit and alternative modes of transportation, would be consistent with this design element.

Electric Vehicle Requirements. This criterion requires that the project achieve compliance with off-street electric vehicle requirements in the most recently adopted version of the California Green Building Standards Code (CALGreen) Tier 2 measures. The Proposed Project includes the construction of 242 new parking spaces, of which 48 would be EV-Capable vehicle stalls and 12 of the parking stalls would include EV charging stations consistent with CALGreen and California Building Code requirements. Therefore, the Proposed Project would be consistent with this design element.

The Proposed Project would be consistent with the Air District's project design elements related to natural gas, energy, and VMT. Therefore, the Proposed Project would be consistent with the Air District's GHG emission thresholds. As such, the Proposed Project would not generate significant GHG emissions that would have a significant effect on the environment, and this impact would be **less than significant**. Mitigation is not required.

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

The City of Napa has not adopted a Climate Action Plan; therefore, the Proposed Project was analyzed for consistency with the goals of the Scoping Plan, Executive Order B-30-15, SB 32, Assembly Bill (AB) 197, and Plan Bay Area 2050.

Scoping Plan. Executive Order B-30-15 added the immediate target of reducing GHG emissions to 40 percent below 1990 levels by 2030. SB 32 affirmed the importance of addressing climate change by codifying into statute the GHG emissions reductions target of at least 40 percent below 1990 levels by 2030 contained in Executive Order B-30-15. CARB released the 2017 Scoping Plan,⁴² to reflect the 2030 target set by Executive Order B-30-15 and codified by SB 32. SB 32 builds on AB 32 to continue the path toward achieving the State's 2050 objective of reducing emissions to 80 percent below

⁴² California Air Resources Board. 2017. *California's 2017 Climate Change Scoping Plan*. November.

1990 levels. The companion bill to SB 32, AB 197, provides additional direction to the CARB related to the adoption of strategies to reduce GHG emissions. Additional direction in AB 197 intended to provide easier public access to air emissions data that are collected by CARB was posted in December 2016.

The 2022 Scoping Plan⁴³ assesses progress toward the statutory 2030 target, while laying out a path to achieving carbon neutrality no later than 2045. The 2022 Scoping Plan Update focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet the State's long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities.

The 2022 Scoping Plan focuses on building clean energy production and distribution infrastructure for a carbon-neutral future, including transitioning existing energy production and transmission infrastructure to produce zero-carbon electricity and hydrogen, and utilizing biogas resulting from wildfire management or landfill and dairy operations, among other substitutes. The 2022 Scoping Plan states that in almost all sectors, electrification will play an important role. The 2022 Scoping Plan evaluates clean energy and technology options and the transition away from fossil fuels, including adding four (4) times the solar and wind capacity by 2045 and about 1,700 times the amount of current hydrogen supply. As discussed in the 2022 Scoping Plan, EO N-79-20 requires all new passenger vehicles sold in California to be zero-emission by 2035, and all other fleets will have transitioned to zero-emission as fully possible by 2045, which will reduce the percentage of fossil fuel combustion vehicles.

The Air District's Justification Report established guidance on how individual projects would be consistent with California's long-term climate goals and provides substantial evidence in supporting the use of their thresholds for projects throughout California because the thresholds are designed to meet the State's established GHG reduction goals, including the 2022 Scoping Plan goals. If a project is designed and built to incorporate these design elements related to VMT, natural gas, energy, and EVs, then it would contribute its portion of what is necessary to achieve California's long-term climate goals, and an agency reviewing the project under CEQA can conclude that the project would be consistent with the State's 2022 Scoping Plan. As discussed above, the Proposed Project would be consistent with the Air District's project design elements and would have a less than significant GHG emissions impact. As analyzed against the thresholds of significance, the Proposed Project would be contributing its "fair share" of emissions reductions to support long-term State goals of GHG emission reductions and carbon neutrality and would therefore be found to be consistent with regional and State goals and applicable plans for GHG emissions reductions.

Plan Bay Area 2050. Plan Bay Area 2050⁴⁴ is a State-mandated, integrated, long-range transportation and land use plan. As required by SB 375, all metropolitan regions in California must complete an SCS as part of a Regional Transportation Plan. In the Bay Area, Metropolitan

⁴³ CARB. 2021. Op. cit.

⁴⁴ Metropolitan Transportation Commission (MTC) and Association of Bay Area Governments (ABAG). 2021. *Plan Bay Area 2050*. October. Website: https://www.planbayarea.org/sites/default/files/documents/Plan_Bay_Area_2050_October_2021.pdf (accessed February 2026).

Transportation Commission (MTC) and ABAG are jointly responsible for developing and adopting an SCS that integrates transportation, land use, and housing to meet GHG reduction targets set by the CARB. Plan Bay Area 2050 connects the elements of housing, the economy, transportation and the environment through 35 strategies that will make the Bay Area more equitable for all residents and more resilient in the face of unexpected challenges. In the short-term, the plan's Implementation Plan identifies more than 80 specific actions for MTC, ABAG, and partner organizations to take over the next 5 years to make headway on each of the 35 strategies. The Plan Bay Area 2050 does not require that local General Plans, Specific Plans, or zoning be consistent with the Plan Bay Area 2050, but provides incentives for consistency for governments and developers.

Implementing Plan Bay Area 2050 will greatly reduce the regional GHG emissions from transportation, helping to achieve statewide emissions reduction targets. The Proposed Project would not require a change in land use or zoning and would therefore not interfere with the Plan Bay Area 2050 ability to achieve the region's GHG reduction targets. Furthermore, the Proposed Project is not regionally significant per *State CEQA Guidelines* Section 15206 and as such, it would not conflict with the Plan Bay Area 2050 targets since those targets were established and are applicable on a regional level.

Based on the nature of the Proposed Project, it is anticipated that implementation of the Proposed Project would not interfere with the Plan Bay Area 2050 ability to implement the regional strategies outlined in the RTP/SCS.

Therefore, the Proposed Project would comply with existing State regulations adopted to achieve the overall GHG emissions reduction goals identified in Executive Order B-30-15, SB 32, and AB 1279 and would be consistent with applicable plans and programs designed to reduce GHG emissions. As such, the Proposed Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs. This impact would be **less than significant**. No mitigation is required.

4.9 HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 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?	☐	☐	☐	☒
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

The information and analysis in this section are based, in part, on the findings from the Phase I Environmental Site Assessment Report (Phase I ESA)⁴⁵ (**Appendix D**) prepared for the Proposed Project by Partner Engineering and Science, Inc., dated December 9, 2024.

4.9.1 Impact Analysis

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

The Proposed Project would result in the development of an industrial building and associated improvements on the Project Site. The Project Site is designated for industrial uses and would likely involve routine transport, use, and/or disposal of hazardous materials during both construction and operation.

⁴⁵ Partner Engineering and Science, Inc. 2024. *Phase I Environmental Site Assessment Report 1030 Kaiser Road Napa, California 94558*. December 9.

Construction. Development of the Proposed Project has the potential to create a hazard to the public or the environment through the routine transportation, use, and disposal of construction-related hazardous materials, such as fuels, oils, solvents, and other materials. All hazardous materials must be disposed of in accordance with applicable Federal, State, and local (City of Napa, Napa County Division of Environmental Health, and the Bay Area Air Quality Management District) regulations to safeguard the public from significant hazards during disposal.

Construction of the Proposed Project would temporarily increase the regional transport, use, and disposal of construction-related hazardous materials and petroleum products (e.g., diesel fuel, lubricants, paints and solvents, and cement products containing strong basic or acidic chemicals). These materials are commonly used at construction sites, and construction of the Proposed Project would be required to comply with applicable State and federal regulations governing the proper transport, use, storage, and disposal of excess hazardous materials and hazardous construction waste.

The temporary transport, use, storage, or disposal of fuels, lubricants, paints, and other hazardous materials related to construction would not pose a potentially significant hazard to the public or the environment unless the materials were accidentally spilled or released into the environment. California standards for workers handling hazardous materials are contained in California Code of Regulations (CCR) Title 8 and include practices applicable to all industries (General Industrial Safety Orders), as well as specific practices for construction. Workers at hazardous waste sites (or workers who may be exposed to hazardous waste encountered during excavation of contaminated soils) must receive specialized training and medical supervision according to the Hazardous Waste Operations and Emergency Response regulations.⁴⁶ Additional regulations have been developed for construction workers potentially exposed to lead⁴⁷ and asbestos.⁴⁸

The transport, use, storage, or disposal of hazardous materials during construction would be regulated by the California Division of Occupational Safety and Health (Cal/OSHA). Additionally, the United States Department of Transportation (USDOT) Office of Hazardous Materials Safety prescribes strict regulations for the transportation of hazardous materials by truck and rail on State highways and rail lines, as set forth in Code of Federal Regulations (CFR) Title 49 and implemented by CCR Title 13. In addition, Federal, State, and local regulations identified in Section 4.10, Hydrology and Water Quality, of this IS/MND would ensure compliance with waste discharge permit requirements to avoid potential impacts on water quality due to spills or runoff from hazardous materials used during construction. Therefore, through compliance with applicable regulatory policies and adherence to the regulatory standards included in Section 4.10, impacts related to the routine transport, use, or disposal of hazardous materials during construction would be **less than significant**.

Operation. Warehousing uses operated on the Project Site could accommodate manufacturing activities, which could include the use and disposal of hazardous waste and the limited use of

⁴⁶ California Code of Regulations, Title 8, Section 5192.

⁴⁷ California Code of Regulations, Title 8, Section 1532.1.

⁴⁸ California Code of Regulations, Title 8, Section 1529.

pesticides and herbicides for landscape maintenance.⁴⁹ Furthermore, vehicles accessing the Project Site would contain oil and gasoline to power their engines, which could result in minor releases of these substances through drips or leaks in parking areas. Transport trucks driving to and from the Project Site may also contribute to accidental releases of oil and gasoline in loading dock areas and parking areas. The Proposed Project is not anticipated to generate or use major hazardous materials and would not generate high quantities of hazardous waste.

All future uses of the Project Site would be subject to existing regulatory programs for hazardous materials. The Napa County Division of Environmental Health (DEH) is the Certified Unified Program Agency (CUPA) for Napa County, including all cities. The role of a CUPA is to consolidate, coordinate, and make consistent the administrative requirements, permits, inspections, and enforcement activities associated with the regulation of hazardous materials and hazardous wastes. The DEH coordinates the regulation of hazardous materials and hazardous waste in Napa County through the following programs:⁵⁰

- Hazardous Waste Generator;
- Underground Storage Tank (UST);
- Aboveground Petroleum Act (APSA);
- Hazardous Materials Business Plan (HMBP)/Hazardous Materials Inventory Statement; and
- California Accidental Release Prevention Program (CAL-ARP).

Businesses that store or use hazardous materials in the City limits of Napa are required to submit chemical and facility information on the California Environmental Reporting System (CERS), which is a statewide web-based system to support CUPAs in electronically collecting and reporting various hazardous materials-related data as mandated by the California Health and Safety Code and 2008 legislation (Assembly Bill [AB] 2286). Chapter 6.95 of Division 20 of the California Health and Safety Code requires that an HMBP must be submitted to the local CUPA if on-site hazardous materials exceed in aggregate any of the following: 55 gallons for liquids; 500 pounds for solids; or 200 cubic feet of gases at standard temperature and pressure. HMBPs must be submitted electronically to the CERS and must include facility information, a Hazardous Materials Inventory Statement, an Emergency Response Plan, and an Emergency Response Training Plan. The HMBP must be re-certified annually for completeness and accuracy, or updated and revised as necessary.

CAL-ARP aims to reduce the likelihood and impact of accidental releases of regulated toxic and flammable substances. Under CAL-ARP, facilities that handle more than a threshold quantity of a regulated hazardous substance, such as federally listed extremely hazardous toxic and flammable substances, and State-listed acutely hazardous materials, must prepare a Risk Management Plan (RMP). The RMP must analyze the potential for accidental release and be submitted to the CUPA for review and certification. The routine transport, use, and disposal of hazardous materials at the Project Site during operation activities would be required to comply with a project Health and Safety Plan (HASP) prepared in accordance with CCR Title 8, which would mitigate potential health hazards

⁴⁹ Pesticide and herbicide use by the Proposed Project would comply with regulations set forth by the California Department of Pesticide Regulation (CDPR) by using only registered and permitted pesticides.

⁵⁰ County of Napa. n.d. CUPA. Website: <https://www.napacounty.gov/1919/CUPA> (accessed January 29, 2026).

for workers related to the routine transport, use, or disposal of hazardous materials to a less-than-significant level.

Compliance with existing hazardous materials regulations and programs described above, including the Construction General Permit (CGP); requirements for HMBPs; Cal/OSHA CCR Title 8 and Occupational Safety and Health Administration (OSHA) regulations; and USDOT, Resource Conservation and Recovery Act (RCRA), and State regulations would ensure that the Proposed Project would not create a significant hazard to the public or the environment associated with the routine transport, use, or disposal of hazardous materials by ensuring that these materials are properly handled during construction and operation of the Proposed Project. Therefore, impacts would be **less than significant**, and no mitigation is required.

b. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

There are two (2) primary ways that the public and/or the environment could be affected by the release of hazardous materials from the Project Site, including: (1) exposing workers and/or the public to potentially contaminated soil and groundwater during construction and/or operation of the project; or (2) exposing workers and/or the public to hazardous building materials (e.g., lead paint, asbestos) during demolition of existing structures.

Because the Proposed Project is currently undeveloped and does not contain any existing structures that would need to be demolished, the Proposed Project would not expose workers and/or the public to hazardous building materials (e.g., lead paint, asbestos). Small quantities of common hazardous materials would be used at the Project Site during construction of the Proposed Project, and the Proposed Project would be required to comply with existing government regulations in the use and disposal of these materials, including the CGP; requirements for HMBPs; Cal/OSHA CCR Title 8 and OSHA regulations; and USDOT, RCRA, and State regulations. Such materials would not be used in sufficient strength or quantity to create a substantial risk to human or environmental health.

To determine if the Proposed Project could expose workers and/or the public to potentially contaminated soil and groundwater during construction and/or operation of the project, a Phase I ESA was prepared in December 2024, in accordance with the standards and procedures outlined in the American Society for Testing and Materials E 1527-21. The Phase I ESA included a review of official government databases on the locations of known hazardous materials releases to identify any listings indicating potential impacts on the Project Site from the presence or migration of hazardous substances. The Phase I ESA provided a search of standard environmental record sources for listings of the Project Site, adjoining properties, and sites within the surrounding area. The Project Site and the surrounding area were also evaluated via the SWRCB GeoTracker database, the California Department of Toxic Substances Control's (DTSC) EnviroStor database, and the Hazardous Waste and Substances Sites (Cortese) list for the purposes of identifying recognized environmental conditions or historical recognized environmental conditions, as discussed in greater detail under Section 4.9.d, below.

The Phase I ESA evaluated the Project Site for potential Recognized Environmental Conditions (RECs), Controlled Recognized Environmental Conditions (CRECs), Historical Recognized Environmental Conditions (HRECs), and Business Environmental Risks (BERs) that may be present, off-site conditions that may impact the subject property, and/or conditions indicative of releases or threatened releases of substances on, at, in, or to the Project Site. An REC means the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. The term is not intended to include de minimis conditions that generally do not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. Conditions deemed de minimis are not recognized environmental conditions. HREC means an environmental condition which in the past would have been considered a recognized environmental condition, but which may or may not be considered a recognized environmental condition currently. If a past release of any hazardous substances or petroleum products has occurred in connection with the property, with such remediation accepted by the responsible regulatory agency (for example, as evidenced by the issuance of a case closed letter or equivalent), this condition shall be considered a historical recognized environmental condition. CREC means a recognized environmental condition affecting the subject property which has been addressed to the satisfaction of the applicable regulatory authority or authorities, with hazardous substances or petroleum products allowed to remain in place, subject to implementation of required controls. BER is a risk that can have a material environmental or environmentally-driven impact on the business associated with the current or planned use of commercial real estate, not necessarily related to those environmental issues required to be investigated in this practice.

According to the Phase I ESA, no RECs, CRECs, or HRECs were identified on the Project Site. However, during the site reconnaissance, several large soil stockpiles were observed on the Project Site. Due to the lack of information regarding the source of the stockpiles, the soil stockpiles were identified as a BER. Construction activities associated with the Proposed Project would include excavation and grading activities that would disturb the soils underlying the Project Site. Because the Phase I ESA indicated that the soil stockpiles may contain contaminated soils and the disruption of the soil stockpiles during construction of the Proposed Project could create a hazard to the public, the Phase I ESA recommended that the soil stockpiles be investigated to determine the presence of contaminated soils. As a result, the Proposed Project would be required to implement **Mitigation Measure HAZ-1**, as described below.

Mitigation Measure HAZ-1

Prior to the issuance of grading permits, the project sponsor shall hire a qualified environmental professional to conduct a limited investigation of the soil stockpiles, documenting the presence or lack thereof of contaminated soils. If the observed stockpiles are determined to be contaminated, the project sponsor shall engage with the appropriate regulatory agency (e.g., the San Francisco Bay Regional Water Quality Control Board [RWQCB] or Department of Toxic Substances Control [DTSC]) to provide oversight of additional subsurface investigation at the Project Site and the implementation

of remedial actions, as necessary, at the Project Site. The report(s) documenting remediation activities shall be submitted to the regulatory oversight agency for review and approval prior to the City of Napa issuing grading permits for the project. Remedial actions that may be required for the project could include, but are not limited to, removal and off-site disposal of contaminated soil, or in-situ treatment of contaminated soil.

If remedial actions are required for the project, the project sponsor shall submit to the City evidence of approval from the regulatory oversight agency for any proposed remedial action plans prior to the City issuing grading or building permits required for the remedial action.

Adherence to existing regulations, such as the CGP; requirements for HMBPs; Cal/OSHA CCR Title 8 and OSHA regulation, USDOT, RCRA, State laws, and implementation of the Phase I recommendations, as provided in **Mitigation Measure HAZ-1**, would ensure that impacts associated with creating a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the a release of hazardous materials during construction activities would be **less than significant with mitigation incorporated**.

Based on the above analysis and the site investigation performed as part of the Phase I ESA, implementation of the Proposed Project would not create a significant hazard to the public or the environment under reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment with the implementation of **Mitigation Measure HAZ-1**. Impacts would be **less than significant with mitigation incorporated**.

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

There are no existing or planned schools within a 0.25-mile radius of the Project Site. The nearest school facility to the Project Site is Phillips Magnet Elementary School, located at 1210 Shetler Avenue, approximately 1.85 miles northeast of the site. As discussed above, any transport and use of hazardous materials associated with the construction of the Proposed Project would use a limited amount of hazardous substances during heavy equipment operation for site excavation, grading, and construction, and would be in accordance with the CGP; requirements for HMBPs; Cal/OSHA CCR Title 8 and OSHA regulations; and USDOT, RCRA, and State regulations. Since no schools are located or proposed within 0.25 miles of the Project Site, and any transport of hazardous materials associated with construction and operation of the Proposed Project would be in accordance with applicable regulatory requirements, **no impact** related to hazardous emissions or handling of hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school would occur.

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

The Project Site and vicinity were evaluated via the SWRCB's GeoTracker database,⁵¹ the DTSC's EnviroStor database,⁵² and the Cortese List⁵³ for the purposes of identifying hazardous materials sites associated with the Project Site. The Project Site is not included on any list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. In addition, no active hazardous materials sites were identified within 1,000 feet of the Project Site. Therefore, **no impact** associated with the Proposed Project being included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 would occur. No mitigation is required.

- e. Would the project be located within an airport land use plan or, where such a plan has not been adopted, within 2 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?*

The Project Site is approximately 2.5 miles north of Napa County Airport. The Napa Countywide Airport Land Use Compatibility Plan (ALUCP),⁵⁴ identifies the Project Site as within the APC Airport Influence Area and Zone D1 Compatibility Zone as delineated in the Napa Countywide ALUCP. The Zone D1 Compatibility Zone (Inner Traffic Pattern Zone) is characterized by low cumulative aircraft noise (generally below 55 CNEL) and a low aircraft safety risk. Additionally, compatible land uses within the D1 Compatibility Zone include light industrial, low intensity uses, and indoor storage uses including winery warehousing. Therefore, the proposed project would not conflict with the Napa Countywide ALUCP and would not result in a safety hazard or expose people working in the project area to excessive aircraft-related noise. **No impact** would occur. No mitigation is required.

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

When the City is experiencing an emergency, an Emergency Operations Center (EOC) may be opened. The City would use social media, broadcast media, and a local notification system to disseminate information during an emergency. Additionally, the City's Emergency Operation Plan (EOP) details how local agencies would coordinate resources, personnel, and functions during an emergency activation.

⁵¹ State Water Resources Control Board (SWRCB). 2022b. Geotracker Database. Website: <https://geotracker.waterboards.ca.gov/> (accessed January 29, 2026).

⁵² California Department of Toxic Substances Control (DTSC). 2022. EnviroStor Database. Website: <https://www.envirostor.dtsc.ca.gov/public/> (accessed January 29, 2026).

⁵³ California Environmental Protection Agency. 2020. Cortese List Data Resources. Website: calepa.ca.gov/sitecleanup/corteselist/ (accessed January 29, 2026).

⁵⁴ Napa County Airport Land Use Commission. 2024. Napa Countywide Airport Land Use Compatibility Plan Containing Individual Plans for Angwin Airport – Parret Field Napa County Airport. Adopted December 4. Website: <https://www.napacounty.gov/DocumentCenter/View/35937/Napa-Countywide-ALUCP---Complete-Version?bidId=> (accessed July 14, 2026).

The Proposed Project would result in the development of an industrial building and associated improvements, including new vehicle access and internal drive aisles of various sizes, on the Project Site. Access to the Project Site would be provided via four (4) driveways, one (1) 40-foot-wide driveway along Kaiser Road, and three (3) 30-foot and 40-foot-wide driveways along Syar Way to accommodate truck and passenger vehicle traffic. Passenger vehicle traffic would enter and exit from the southern driveway along Kaiser Road and the two (2) southeastern driveways along Syar Way. Passenger vehicles exiting from the southern driveway along Kaiser Road would be restricted to only right-turn exits onto Kaiser Road. Trucks would then exit via the northernmost driveway along Syar Way, providing truck access while minimizing interference with passenger vehicle traffic.

Circulation throughout the Project Site would be consistent with applicable requirements regarding fire access in the event of an emergency, including all NFD standards, City of Napa Standard Specifications and Zoning Ordinance, and the California Fire Code. The Proposed Project would not reduce the number of traffic lanes on Kaiser Road or alter the existing street layout; therefore, it would not affect or obstruct emergency evacuation routes. In addition, the Proposed Project would be consistent with the policies outlined in the City's General Plan Safety Element,⁵⁵ including Policy SN 5-4, in which the City would ensure that future development plans provide adequate evacuation routes, vegetation management policies, and fire-reduction measures, as appropriate. Therefore, the Proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Impacts would be **less than significant**, and no mitigation is required.

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

The California Department of Forestry and Fire Protection (CAL FIRE) has mapped Very High Fire Hazard Severity Zones in Napa County to help responsible local agencies, such as the NFD, identify measures to reduce the potential for loss of life, property, and resources from wildland fire. The Project Site and surrounding area are mapped by CAL FIRE as being outside of the Very High Fire Hazard Severity Zone (VHFHSZ).⁵⁶ In addition, no hillside or natural areas prone to wildfire are located in the immediate project vicinity, as the surrounding area is urbanized and developed for industrial, office/commercial, and residential uses. Due to the project's location, on-site and adjacent areas have limited capacity to support wildfire.

Construction of the Proposed Project would require the use of construction equipment that could generate sparks and temporarily increase fire risks. The operation of the Proposed Project could involve industrial activities that could also increase fire risks, and if the proposed landscaping vegetation on the Project Site is not appropriately managed, the Proposed Project could increase the risk of fire spreading from the Project Site to surrounding areas. In addition, the Proposed

⁵⁵ City of Napa. 2022a. "Chapter 8: Safety and Noise Element." *City of Napa 2040 General Plan*. Website: <https://www.cityofnapa.org/DocumentCenter/View/10794/Napa-General-Plan-PDF> (accessed January 29, 2026).

⁵⁶ California Department of Forestry and Fire Protection (CAL FIRE). 2025. Fire Hazard Severity Zones Mapper. Website: <https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=988d431a42b242b29d89597ab693d008> (accessed January 29, 2026).

Project would be required to implement and abide by applicable Building and Fire Codes, which include requirements for internal road widths, access points for the Project Site, and construction fire suppression techniques. The Proposed Project would also adhere to the Napa General Plan Safety Policies SN 5-3 through SN 5-5. These General Plan policies emphasize minimizing exposure of people and property to hazards through wildfire education, hazard-aware site design and improvements, and the maintenance of adequate emergency access and evacuation routes—the Project’s adherence to these policies would further reduce the wildfire risk at the Project Site. Lastly, future tenants of the Proposed Project would be required by OSHA to establish an emergency action plan that would reduce the exposure of employees to risks of loss, injury, or death in the event of fires. Proper enforcement of these existing regulations will ensure that the Proposed Project’s implementation would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Impacts would be **less than significant**, and no mitigation is required.

4.10 HYDROLOGY AND WATER QUALITY

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

The following hydrology and water quality analysis is based, in part, on the Stormwater Control Plan⁵⁷ (**Appendix E1**) and the Stormwater Drainage Analysis⁵⁸ (**Appendix E2**) prepared for the Proposed Project by Laugenour and Meikle and dated October 28, 2025, and the Geotechnical Engineering Report (Geotechnical Report)⁵⁹ (**Appendix C**) prepared for the Proposed Project by Raney Geotechnical Inc., and dated February 21, 2025.

⁵⁷ Laugenour and Meikle. 2025. *Stormwater Control Plan For a Regulated Project For Planning Review Application Napa Valley Vintners Park, 1030 Kaiser Road, APN: 046-370-004-000 Napa, CA 94558*. October 28.

⁵⁸ Laugenour and Meikle. 2025. *Stormwater Drainage Analysis for the Napa Valley Vintners Park Project, 1030 Kaiser Road, napa, California, APN 046-370-004 (Planning Application 23-0135)*. October 28.

⁵⁹ Raney Geotechnical Inc. 2025. *Geotechnical Engineering Report, 1030 Kaiser Road Warehouse*. February 21.

4.10.1 Impact Analysis

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

The SWRCB and nine (9) RWQCBs regulate the water quality of surface water and groundwater bodies throughout California. In the City of Napa, the San Francisco Bay RWQCB is responsible for implementation of the Water Quality Control Plan (Basin Plan).⁶⁰ The Basin Plan establishes beneficial water uses for waterways and water bodies in the region. Section 303(d) of the federal Clean Water Act (CWA) requires states to identify water bodies, including bays, rivers, streams, creeks, and coastal areas that do not meet water quality standards and the pollutants that are causing the impairment. Total Maximum Daily Loads (TMDLs) describe the maximum amount of a pollutant that a water body can receive while still meeting established water quality standards. A TMDL establishes limits for pollutant discharges into impaired water bodies.

The Project Site is currently undeveloped and generally flat, with elevations ranging from approximately 12 to 23 feet. The Project Site's topography slopes slightly downward from north to south. Under existing conditions, stormwater at the Project Site either infiltrates at the Project Site or flows southwest to discharge into the existing 96-inch storm drain within Kaiser Road. The stormwater infrastructure within Kaiser Road discharges to the Napa River, west of the Project Site, which in turn drains to San Pablo Bay and ultimately to San Francisco Bay. According to the SWRCB 2024 California Integrated Report for CWA Section 303(d), the Napa River is listed as an impaired water body for nutrients and pathogens. San Pablo Bay is listed as an impaired water body for the following: chlordane, dichlorodiphenyltrichloroethane (DDT), dieldrin, dioxin compounds, furan compounds, invasive species, mercury, polychlorinated biphenyls (PCBs), selenium, and PCBs (dioxin-like). The Central San Francisco Bay is listed as an impaired water body for chlordane, DDT, dieldrin, dioxin compounds, furan compounds, invasive species, trash, mercury, PCBs, selenium, and PCBs (dioxin-like).⁶¹ TMDLs have been adopted for the Napa River, San Pablo Bay, and the Central San Francisco Bay, which would be applicable to the Proposed Project.

Runoff water quality is regulated by the National Pollution Discharge Elimination System (NPDES) Program (established through the federal CWA). The NPDES program aims to control and reduce pollutant discharges to surface water bodies. Compliance with NPDES permits is mandated by State and federal statutes and regulations. Locally, the NPDES Program is administered by the San Francisco Bay RWQCB.

The City is a co-permittee under the SWRCB's *NPDES General Permit for Waste Discharge Requirements (WDRs) for Storm Water Discharges for Small Municipal Separate Storm Sewer Systems (MS4s)*, Order WQ 2013-0001-DWQ, NPDES No. CAS000004, as amended by Order WQ 2015-0133-EXEC, Order WQ 2016-0069-EXEC, Order WQ 2017-0031-DWQ, Order WQ 2018-0001-

⁶⁰ California Regional Water Quality Control Board – San Francisco Bay Region. 2024. *Water Quality Control Plan (Basin Plan) for the San Francisco Bay Basin* (including all Basin Plan amendments adopted and approved through July 22, 2024). Website: https://www.waterboards.ca.gov/sanfranciscobay/basin_planning.html (accessed January 12, 2026).

⁶¹ San Francisco Bay Regional Water Quality Control Board (RWQCB). 2023. *Water Quality Control Plan (Basin Plan) for the San Francisco Bay Basin*, amendments adopted up through March 7, 2023.

EXEC, Order WQ 2018-0007-EXEC, and Order WQ 2019-0009-EXEC (Phase II Small MS4 Permit).⁶² The Phase II Small MS4 Permit covers stormwater discharges from municipalities and local agencies in Marin, Napa, San Francisco, Solano, and Sonoma counties; the cities of Benicia, Petaluma, and Sonoma; and non-traditional facilities such as universities, prisons, hospitals, military bases, parks, and office building complexes. The Phase II Small MS4 Permit requires the City of Napa to develop, implement, document, and report on a comprehensive municipal stormwater program that implements Best Management Practices (BMPs) to address post-construction stormwater management for new and redevelopment projects and pollution prevention. As required by the Phase II Small MS4 Permit, five (5) cities and towns in Napa County, including the City of Napa, together with Napa County, form the Napa Countywide Stormwater Pollution Prevention Program (NCSPPP) to prevent stormwater pollution, protect and enhance water quality in creeks and wetlands, and comply with State and federal regulations. BMPs that address post-construction stormwater management for new and redevelopment projects and pollution prevention include Site Design, Source Control, Low Impact Development (LID), and Treatment Control BMPs which capture, treat, and reduce pollutants of concern in stormwater runoff. Site Design BMPs are stormwater management strategies that emphasize the conservation and use of existing site features to reduce runoff volume and pollutant loading from a site. Source Control BMPs are preventive measures implemented to prevent pollutants from entering stormwater. LID BMPs mimic a Project Site's natural hydrology by using design measures that capture, filter, store, evaporate, detain, and infiltrate runoff rather than allowing runoff to flow directly to piped or impervious storm drains. Lastly, Treatment Control BMPs are structural BMPs designed to treat and reduce pollutants in stormwater runoff prior to releasing it to receiving waters.

Construction. Construction activities are subject to the SWRCB's *NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities, Order No. 2022-0057-DWQ, NPDES No. CAS000002* (CGP).⁶³ Any construction activity, including grading, that would result in the disturbance of one (1) acre or more would require compliance with SWRCB's CGP, which requires preparation of a Storm Water Pollution Prevention Plan (SWPPP) and implementation of Construction BMPs during construction activities. Construction BMPs would include, but not be limited to, Erosion Control and Sediment Control BMPs designed to minimize erosion and retain sediment on site, and good housekeeping BMPs to prevent spills, leaks, and discharge of construction debris and waste into receiving waters.

The Proposed Project would result in the development of an industrial building and associated improvements on the 10.21-acre Project Site. Pollutants of concern during construction include pathogens, nutrients (phosphorus and nitrogen), sediment, metals, oil and grease, trash/debris, pesticides/herbicides, and organic compounds. Each of these pollutants, on its own or in

⁶² State Water Resources Control Board (SWRCB). 2013. *NPDES General Permit for Waste Discharge Requirements (WDRs) for Storm Water Discharges for Small Municipal Separate Storm Sewer Systems (MS4s), Order WQ 2013-0001-DWQ, NPDES No. CAS000004, as amended by Order WQ 2015-0133-EXEC, Order WQ 2016-0069-EXEC, Order WQ 2017-0031-DWQ, Order WQ 2018-0001-EXEC, Order WQ 2018-0007-EXEC, and Order WQ 2019-0009-EXEC.*

⁶³ State Water Resources Control Board (SWRCB). 2022. *National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities, Order No. 2022-0057-DWQ, NPDES No. CAS000002.* September 8. Effective September 1, 2023.

combination with other pollutants, can have a detrimental effect on water quality. During construction activities, excavated soil would be exposed, increasing the potential for soil erosion and sedimentation compared to existing conditions. In addition, chemicals, liquid products, petroleum products (e.g., paints, solvents, and fuels), and concrete-related waste may be spilled or leaked during construction. Any of these pollutants have the potential to be transported via stormwater runoff into receiving waters (i.e., Napa River, San Pablo Bay, and the San Francisco Bay).

Construction of the Proposed Project is anticipated to disturb more than one (1) acre of soil. As such, the Proposed Project would be subject to the requirements of the CGP. The Proposed Project would also be required to comply with Chapter 8.36, Storm Water Quality, and Section 8.36.120, Construction Activities, of the City's Municipal Code. As required by the CGP and Chapter 8.36 of the City's Municipal Code, the Applicant would be required to prepare a SWPPP and ensure that the Contractor implements Construction BMPs detailed in the SWPPP during construction activities. Construction BMPs would include, but not be limited to, Erosion Control and Sediment Control BMPs designed to minimize erosion and retain sediment on site, and good housekeeping BMPs to prevent spills, leaks, and discharge of construction debris and waste into receiving waters.

According to the Geotechnical Report prepared for the Proposed Project, groundwater was encountered between 7 and 18 feet below ground surface (bgs). In addition, a review of historical groundwater data indicated that groundwater could be as high as 5 feet bgs at the Project Site. Excavation at the Project Site during construction of the Proposed Project is anticipated to extend to a maximum depth of 6 feet bgs. As such, excavation during construction of the Proposed Project would extend to a depth where groundwater may be encountered, and groundwater dewatering may be required during project construction. Groundwater dewatering activities could affect surface water quality through the discharge of polluted groundwater, if present, to surface water bodies, such as the receiving waters for the Project Site (i.e., Napa River, San Pablo Bay, and the San Francisco Bay). Groundwater dewatering activities would be required to comply with the CGP, which requires testing and treatment (if necessary) prior to discharge to the storm drain system. If the dewatering activity is determined by the San Francisco Bay RWQCB not to be covered by the CGP due to contamination from fuels or volatile organic compounds (VOCs), the Proposed Project would be required to seek coverage under NPDES Permit No. CAG912002, issued by the RWQCB under Order No. R2-2017-0048,⁶⁴ which covers the discharge or reclamation of extracted and treated groundwater resulting from the cleanup of groundwater polluted by VOCs, fuel leaks, fuel additives, and other related wastes.

Adherence to the CGP, including implementation of the required SWPPP and Construction BMPs and the testing and treatment (if necessary) of dewatered groundwater prior to discharge, would ensure construction impacts related to surface water quality standards, waste discharge requirements, and surface water quality would be less than significant. No mitigation is required.

⁶⁴ San Francisco Bay Regional Water Quality Control Board (RWQCB). 2019. Order No. R2-2017-0048, NPDES Permit No. CAG912002, General Waste Discharge Requirements for Discharge or Reclamation of Extracted and Treated Groundwater Resulting from the Cleanup of Groundwater Polluted by Volatile Organic Compounds (VOCs), Fuel Leaks, Fuel Additives, and Other Related Wastes (VOC and Fuel General Permit). Effective January 1, 2019.

Operation. As previously discussed, the City is a co-permittee under the Phase II Small MS4 Permit. Compliance with the Phase II Small MS4 Permit is achieved through the requirements established in the City of Napa Municipal Code. As specified in Chapter 8.36, all development projects must be consistent with the post-construction standards in the Phase II Small MS4 Permit, the NCSPPP, the *Bay Area Stormwater Management Agencies Association Post-Construction Manual* (BASMAA Post-Construction Manual), and the California Stormwater Quality Association (CASQA) Industrial/Commercial BMP Handbook.^{65,66} Under the BASMAA Post-Construction Manual requirements, projects that create or replace 5,000 square feet or more of impervious surface must include Site Design measures which limit clearing, grading, and soil compaction, minimize imperviousness, reduce runoff, conserve natural areas of the Project Site as much as possible, comply with stream setback ordinances, and protect slopes and channels against erosion. In addition to these Site Design measures, the project is required to route runoff to adequately sized bioretention facilities, identify potential sources of pollutants, implement corresponding source control measures, and provide for ongoing maintenance of bioretention facilities. Chapter 2 of the BASMAA Post-Construction Manual requires the preparation and submittal of a Stormwater Control Plan. Consistent with BASMAA Post-Construction Manual requirements, the Proposed Project includes a Stormwater Control Plan,⁶⁷ which would treat a total of 347,940 square feet of new and replaced impervious surface area.

The purpose of a Stormwater Control Plan is to detail the design elements and implementation measures necessary to meet the post-construction stormwater control requirements of the Phase II Small MS4 Permit. Stormwater Control Plans must include Site Design measures and treatment facilities, which reduce water quality impacts by minimizing imperviousness, retaining or detaining stormwater, slowing runoff rates, and reducing pollutants in post-development runoff. Additionally, the preparation of a Stormwater Facilities Operation and Maintenance Plan is required by the BASMAA Post-Construction Manual to ensure that stormwater control measures are inspected, maintained, and funded for the life of the project. As discussed in Section 2.0, Project Description, of this IS/MND, the Proposed Project would also include LID and Treatment BMPs to capture and treat runoff from the Project Site, including four (4) bioretention basins and approximately 20,973 square feet of bioretention space that would be used for stormwater control and treatment to reduce pollutants of concern in stormwater. The proposed bioretention basins would retain and infiltrate at the Project Site, with overflows discharged off-site and be designed to meet the requirements of the Phase II Small MS4 Permit. Therefore, compliance with the requirements of the Phase II Small MS4 Permit, the NCSPPP, the BASMAA Post-Construction Manual, and the CASQA Industrial/Commercial

⁶⁵ City of Napa. 2025. *City of Napa Municipal Code, Title 8 Health and Safety, Chapter 8.36 Storm Water Quality Control, Sections 8.36.120 and 8.36130*. Website: <https://ecode360.com/43395872#43395964> (accessed January 29, 2026).

⁶⁶ Bay Area Stormwater Management Agencies Association (BASMAA). 2014. BASMAA Post-Construction Manual. *Design Guidance for Stormwater Treatment and Control for Projects in Marin, Sonoma, Napa, and Solano Counties*. July 14. Website: <https://basmaa.org/wp-content/uploads/2021/02/basmaa-post-construction-manual.pdf> (accessed January 29, 2026).

⁶⁷ Laugenour and Meikle. 2025. Stormwater Control Plan for a Regulated Project for Planning Review Application Napa Valley Vintners Park 1030 Kaiser Road, APN: 046-370-004-000 Napa, CA 94558. October 28.

BMP Handbook would ensure that operational impacts to water quality would be less than significant. No mitigation is required.

Overall, because the Proposed Project would be required to implement BMPs and comply with existing regulations, including the CGP, the Phase II MS4 Permit, the NCSPPP, the BASMAA Post-Construction Manual, the CASQA Industrial/Commercial BMP Handbook, and the City's Municipal Code, the Proposed Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality during construction or operation of the Proposed Project. Impacts would be **less than significant. No mitigation is required.**

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

The Project Site is located within the Napa Valley Groundwater Basin, a subbasin of the larger Napa-Sonoma Valley Groundwater Basin.⁶⁸ The Napa Valley Subbasin (Number 2-002.01) has a surface area of 45,952 acres (71.8 square miles) and is situated in the Napa River watershed, generally aligned with the floor of the Napa Valley. The total groundwater storage capacity of the Napa Valley Groundwater Basin is approximately 708,000 acre-feet.⁶⁹ Natural recharge occurs in the Sonoma Creek watershed and is principally sourced from precipitation, and predominantly occurs as seepage from creeks, lakes, reservoirs, and direct infiltration of precipitation on soils.

Construction. As discussed above and based on the findings of the Geotechnical Report prepared for the Proposed Project, review of historical groundwater data in the area indicates that groundwater can be as high as 5 feet bgs at the Project Site. Project construction would require excavations up to 6 feet for the proposed bioretention facilities. As such, excavation during construction of the Proposed Project would extend to a depth where groundwater may be encountered, and groundwater dewatering may be required during project construction. However, compared to the estimated 708,000 acre-feet of groundwater in storage in the Napa Valley Groundwater Basin, the amount of water extracted would not be substantial and would occur only temporarily during construction.

In addition, existing drainage patterns at the Project Site would generally be maintained during construction, and natural infiltration would continue to occur at the Project Site and within the Napa River. Therefore, construction of the Proposed Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge.

Operation. The City of Napa provides water to the Project Site. The City's potable water supply is derived from various surface sources, including the State Water Project, Lake Hennessey, and the

⁶⁸ California Department of Water Resources (DWR). 2018. *Groundwater Basin Boundary Assessment Tool*. Website: <https://gis.water.ca.gov/app/bbat/> (accessed January 29, 2026).

⁶⁹ California Department of Water Resources. 2014. Bulletin 118. Napa-Sonoma Valley Groundwater Basin, Sonoma Valley Subbasin. Last updated June 30.

Milliken Reservoir.⁷⁰ Because the City does not use groundwater for its municipal water supply, water use during operation of the Proposed Project would not affect groundwater supplies.

Development of the Proposed Project would result in an increase in impervious surfaces on the Project Site from zero (0) acres to approximately eight (8) acres, which would decrease the potential for on-site infiltration. However, in compliance with the Phase II Small MS4 Permit, the Proposed Project would include four (4) bioretention basins totaling approximately 20,973 square feet of bioretention space for stormwater control and treatment. The bioretention basins would collect, treat, and infiltrate stormwater at the Project Site, with overflows discharging to the existing stormwater infrastructure within Kaiser Road. Due to the incorporation of bioretention space that would infiltrate stormwater at the Project Site, as required by the Phase II MS4 Permit, the Proposed Project would not result in a significant decrease in groundwater recharge, leading to a net deficit in aquifer volume or a lowering of the local groundwater table level. Therefore, the Proposed Project would not interfere with groundwater recharge.

For the reasons listed above, impacts related to the decrease of groundwater supplies or interference with groundwater recharge would be **less than significant**. No mitigation is required.

c. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i. Result in substantial erosion or siltation on- or off-site;

In the existing condition, stormwater at the Project Site either infiltrates or sheet flows southwest to discharge into the existing stormwater infrastructure within Kaiser Road. The storm drain in Kaiser Road then discharges to the Napa River, San Pablo Bay, and ultimately the San Francisco Bay. In the post-project condition, stormwater would be intercepted by multiple proposed catch basins and curb inlets and conveyed to one (1) of four (4) bioretention basins, where stormwater would infiltrate into the soil. Overflows from the bioretention basins would be discharged into the existing stormwater infrastructure within Kaiser Road, similar to existing conditions.

Construction. During construction activities, soil would be exposed and disturbed, drainage patterns would be temporarily altered, and there would be an increased potential for soil erosion and siltation compared to existing conditions. Additionally, during a storm event, soil erosion and siltation could occur at an accelerated rate. As discussed above, the Proposed Project would be required to obtain coverage under the CGP, which requires the preparation of a SWPPP. The SWPPP would detail Erosion Control and Sediment Control BMPs to be implemented during construction to minimize erosion and retain sediment on site. The Proposed Project would also be required to comply with Chapter 8.36, Section 8.36.120 of the City's Municipal Code.⁷¹ Since the Project would be compliant with the requirements in the CGP and the City's Municipal Code, including

⁷⁰ City of Napa. 2022. *2020 Urban Water Management Plan*. January.

⁷¹ City of Napa. 2025. *City of Napa Municipal Code, Title 8 Health and Safety, Chapter 8.36 Storm Water Quality Control, Section 8.36.120*. Website: <https://ecode360.com/43395872#43395964> (accessed January 29, 2026).

implementation of Construction BMPs, construction impacts related to on- or off-site erosion or siltation would be **less than significant**. No mitigation is required.

Operation. Implementation of the Proposed Project would result in an increase in impervious surfaces on the Project Site from zero (0) acres to approximately eight (8) acres. An increase in impervious surface area increases the rate and volume of runoff during a storm, which can more effectively transport sediments to receiving waters. However, the impervious surface areas on the Project Site would not be prone to on-site erosion or siltation because there would be no exposed soil. The remaining pervious surfaces on the Project Site would be landscaped with vegetation that would stabilize the soil and promote infiltration, thereby minimizing on-site erosion and siltation. Furthermore, as discussed above, the Proposed Project would include Site Design and LID BMPs, including four (4) bioretention basins and approximately 20,973 square feet of bioretention space, in compliance with the Phase II Small MS4 permit, thereby minimizing on-site erosion and siltation. Due to the incorporation of bioretention space and implementation of LID techniques as required by the Phase II MS4 Permit, operational impacts related to on- or off-site erosion or siltation would be **less than significant**. No mitigation is required.

- ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;*

Construction. As discussed above, project construction would comply with the requirements of the CGP, which require preparation of a SWPPP that would specify Construction BMPs to control and direct on-site surface runoff to ensure that project construction does not increase the rate or amount of surface runoff in a manner that would result in on-site or off-site flooding. With implementation of a SWPPP and associated Construction BMPs, construction impacts related to a substantial increase in the rate or amount of surface runoff in a manner that would result in on-site or off-site flooding would be **less than significant**, and no mitigation is required.

Operation. Development of the Proposed Project would result in an increase in impervious surfaces on the Project Site from zero (0) acres to approximately eight (8) acres, which could have the potential to increase the volume and rate of stormwater runoff discharged from the Project Site. However, as previously discussed, the proposed LID BMPs (four (4) bioretention basins and approximately 20,973 square feet of bioretention space) would capture and treat stormwater runoff consistent with the requirements of the Phase II MS4 Permit. The proposed drainage facilities and BMPs needed to accommodate stormwater runoff would be appropriately sized so that on-site flooding would not occur. Therefore, due to the implementation of LID techniques as required by the Phase II MS4 Permit, the Proposed Project would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off-site. Impacts would be **less than significant**, and no mitigation is required.

- 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*

Stormwater Drainage System Capacity. As discussed above, project construction would comply with the requirements of the CGP, which requires the preparation of a SWPPP that would specify

Construction BMPs to control and direct on-site surface runoff to ensure that stormwater runoff from the construction site does not exceed the capacity of the stormwater drainage system.

As previously discussed, under existing conditions, the Project Site is undeveloped, and stormwater at the Project Site either infiltrates or sheet flows southwest to discharge into existing stormwater infrastructure within Kaiser Road. The Proposed Project would increase the impervious surface area compared to existing conditions, which would increase stormwater runoff collected on the Project Site and discharged off-site into the existing storm drainage system and receiving waters.

The Proposed Project would include four (4) bioretention basins and approximately 20,973 square feet of bioretention space located along Syar Way, Kaiser Road, and the western edge of the Project Site. These bioretention areas would collect stormwater runoff from the Project Site and be used for stormwater control and treatment before infiltrating at the Project Site. The proposed bioretention basins would capture and retain the required design capture volume (DCV) for the Project Site and gradually release overflows to the existing stormwater infrastructure within Kaiser Road. According to the Stormwater Drainage Analysis, the modeled storm drains have adequate capacity, and the drain inlets have adequate inflow capacity to keep surface ponding within the expected bioretention reservoir and parking lot ponding area.⁷² Therefore, stormwater runoff would not exceed the capacity of the existing stormwater system pursuant to the requirements of the Phase II Small MS4 Permit.

As a result, the Proposed Project would not result in an exceedance of planned or existing stormwater drainage systems during project construction or operations, and impacts would be **less than significant**. No mitigation is required.

Polluted Runoff. As discussed in Section 4.10.1.a, pollutants of concern during construction include pathogens, nutrients (phosphorous and nitrogen), sediment, metals, oil and grease, trash/debris, pesticides/herbicides, and organic compounds. Each of these pollutants on its own or in combination with other pollutants can have a detrimental effect on water quality. Drainage patterns would be temporarily altered during grading and other construction activities, and construction-related pollutants could be spilled, leaked, or transported via storm runoff into adjacent drainages and downstream receiving waters. However, as previously discussed, the Proposed Project would be required to comply with the requirements of the CGP, which requires preparation of a SWPPP that would specify Construction BMPs to be implemented to control the discharge of pollutants in stormwater runoff due to construction activities.

During operation, expected pollutants of concern from long-term operations include pathogens (bacteria/viruses), nutrients, pesticides/herbicides, trash and debris, and oil and grease. However, as previously discussed, the Project design would comply with the Phase II MS4 Permit and the implementation of Operational BMPs to reduce pollutants of concern in stormwater runoff by including four (4) bioretention basins and approximately 20,973 square feet of bioretention space that would collect and treat stormwater before infiltrating at the Project Site. Overflows from the bioretention basins would be treated prior to discharge to the existing stormwater infrastructure

⁷² Laugenour and Meikle. 2025. *Stormwater Drainage Analysis for the Napa Valley Vintners Park Project, 1030 Kaiser Road, Napa, California, APN 046-370-004 (Planning Application 23-0135)*. October 28.

within Kaiser Road. Therefore, compliance with the Phase II Small MS4 Permit would ensure that the Proposed Project would not discharge substantial sources of polluted runoff from the Project Site.

Therefore, the Proposed Project would not provide substantial additional sources of polluted runoff during project construction or operations, and impacts would be **less than significant**. No mitigation is required.

iv. Impede or redirect flood flows?

According to Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) No. 06055C0519G, the Project Site is located in Zone X, which is identified as an area of minimal flood hazard, and is not within a 100-year flood zone.⁷³ Additionally, the Proposed Project would not substantially alter drainage patterns. Because the Proposed Project would not place improvements or structures within a 100-year floodplain, it would not impede or redirect flood flows, and impacts would be **less than significant**. No mitigation is required.

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

Tsunami. The Project Site is not located in an area mapped by the California Emergency Management Agency as being potentially inundated by a tsunami.⁷⁴

Seiches. Seiches are waves that are created in an enclosed body of water, such as a bay, lake, or harbor, and go up and down or oscillate, but do not progress forward like standard ocean waves. There are no enclosed bodies of water in the vicinity of the Project Site, and no seismically induced seiche waves have been documented in the San Francisco Bay throughout history.⁷⁵

Dam Inundation. According to the California Department of Water Resources, Division of Safety of Dams' (DOSD) Dam Breach Inundation mapping, the Project Site is not located within a mapped dam-failure inundation area.⁷⁶

Flooding. As discussed above and according to the FEMA FIRM No. 06055C0519G,⁷⁷ the Project Site is not located in a flood hazard zone. Because the Project Site is not within a flood hazard, tsunami, seiche, or dam inundation zone, implementation of the Proposed Project would not result in the

⁷³ Federal Emergency Management Agency (FEMA). 2016. Flood Insurance Rate Map No. 06095C0629G. Map Revised August 3, 2016. Website: <https://msc.fema.gov/portal/search> (accessed January 29, 2026).

⁷⁴ California Department of Conservation (DOC). *Alameda County Tsunami Hazard Areas*. Website: <https://www.conservation.ca.gov/cgs/tsunami/maps/alameda> (accessed January 29, 2026).

⁷⁵ Association of Bay Area Governments (ABAG) and Metropolitan Transportation Commission (MTC). 2013. *Plan Bay Area*. July 18.

⁷⁶ California Department of Water Resources, Division of Safety of Dams, 2015. *Dam Breach Inundation Map Web Publisher*. Website: https://fmds.water.ca.gov/webgis/?appid=dam_prototype_v2 (accessed January 29, 2026).

⁷⁷ Federal Emergency Management Agency (FEMA). 2016. Flood Insurance Rate Map (FIRM) No. 06055C0519G, effective August 3.

release of pollutants from inundation by a flood, tsunami, seiche, or dam failure event. **No impact** would occur.

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

As previously discussed, the Project Site is within the jurisdiction of the San Francisco Bay RWQCB. The San Francisco Bay RWQCB adopted the Basin Plan⁷⁸ that designates beneficial uses for all surface and groundwater within its jurisdiction and establishes the water quality objectives and standards necessary to protect those beneficial uses. As discussed in detail above, the Proposed Project would comply with existing NPDES requirements, including the CGP and Phase II Small MS4 Permit, and would implement Construction and Operational BMPs to reduce pollutants of concern in stormwater runoff. Additionally, during construction, any dewatered groundwater would comply with the requirements of the CGP, including testing and treatment (if necessary) prior to discharge. Excavation during construction of the Proposed Project would extend to a depth where groundwater may be encountered, and groundwater dewatering may be required during project construction. However, compared to the estimated 708,000 acre-feet of groundwater in storage in the Napa Valley Groundwater Basin, the amount of water that would be extracted would not be substantial and would only occur temporarily during construction. Groundwater would continue to be infiltrated at the Project Site during construction, and natural recharge would occur.

Although there would be an increase in impervious surfaces (decreasing infiltration and recharge), the Proposed Project includes multiple bioretention basins that would treat and infiltrate stormwater at the Project Site, contributing to recharge. Therefore, the Proposed Project would not conflict with or obstruct the implementation of a water quality control plan or sustainable groundwater management plan. Impacts would be **less than significant**, and no mitigation is required.

⁷⁸ San Francisco Bay Regional Water Quality Control Board (RWQCB). 2023. *Water Quality Control Plan (Basin Plan) for the San Francisco Bay Basin*, amendments adopted up through March 7, 2023.

4.11 LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	☐	☐	☐	☒
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

4.11.1 Impact Analysis

a. *Would the project physically divide an established community?*

The physical division of an established community typically refers to the construction of a physical feature (such as an interstate highway or railroad tracks) or the removal of a means of access (such as a local road or bridge) that would impair mobility within an existing community, or between a community and outlying areas. The Proposed Project does not include the construction of any major barriers, including highways, railroad tracks, or bridges.

The Proposed Project would include the development of a 153,380 square foot multi-tenant light industrial building broken up into approximately 130,373 square feet of warehouse space and 23,007 square feet of office space. The Project Site is currently undeveloped and generally surrounded by industrial, commercial, office, and residential uses. As an industrial development, the Proposed Project represents a continuation of the type of development in the surrounding area. The Proposed Project would not result in a physical division of an established community or adversely affect the continuity of land uses in the vicinity. As a result, the Proposed Project would have **no impact** related to physically dividing an established community. No mitigation is required.

b. *Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*

An environmental impact could occur when a project conflicts with a policy or regulation intended to avoid or reduce an environmental impact. The following discussion does not replace or preclude consistency discussions as part of project approval considerations, which consider more than potential impacts to the environment.

The Project Site is designated Light Industrial in the City of Napa General Plan and is zoned IL.⁷⁹ The Light Industrial Land Use designation supports a range of small-scale industrial and production-oriented uses, including manufacturing, fabrication, storage, and equipment repair. It also allows for creative and specialized uses such as artisan shops, distilleries, tech start-ups, and research and development facilities. The IL zoning designation provides for small-scale manufacturing, fabrication,

⁷⁹ City of Napa. 2022a. *City of Napa 2040 General Plan*. Website: <https://www.cityofnapa.org/DocumentCenter/View/10794/Napa-General-Plan-PDF> (accessed January 29, 2026).

packaging, storage, equipment repair, wholesale establishments, construction and maintenance yards, trade and technical training facilities, utility plants, recycling centers, and similar facilities.

The Proposed Project includes the development of a 153,380-square-foot multi-tenant light industrial building divided into approximately 130,373 square feet of warehouse space and 23,007 square feet of office space. As an industrial development, the Proposed Project would be consistent with the Project Site's land use and zoning designation. Additionally, the Proposed Project would be compatible with the existing industrial land uses in the vicinity of the Project Site. Further, the potential for the Proposed Project to result in environmental impacts has been considered in each topic area of this document, and no significant impacts would occur after implementation of the recommended mitigation measures. As detailed throughout this IS/MND, all potential impacts to the environment resulting from the Proposed Project are subject to applicable mitigation and local, State and/or federal regulations, which would reduce those impacts to less-than-significant levels. Therefore, the Proposed Project would have no impact related to conflicts with land use plans, and no mitigation is required.

4.12 MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

4.12.1 Impact Analysis

- a. *Would the project 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?*

The California State Surface Mining and Reclamation Act (SMARA) was adopted in 1975 to regulate surface mining, prevent adverse environmental impacts, and preserve the State's mineral resources. SMARA provides for the evaluation of an area's mineral resources using a system of Mineral Resource Zone (MRZ) classifications that reflect the known or inferred presence and significance of a given mineral resource. According to the Department of Conservation CGS Mineral Land Classification Map, Napa County is within SMARA Study Areas Special Report 146, which identifies the project area as MRZ-1 (area with no significant mineral deposits or a minimal likelihood of significant mineral deposits).⁸⁰ However, the California Department of Conservation Mines Online Map identified the Napa Quarry at 2301 Napa-Vallejo Highway, approximately 0.85 miles northeast of the Project Site.⁸¹ The Napa Quarry was historically known as the Basalt Rock Quarry operated as a regional producer of rock, sand, gravel, and asphalt. As of 2022, Vulcan Materials Company acquired the Napa Quarry operations and supplies aggregate materials for regional construction. Given the distance between the Project Site and the Napa Quarry, the Proposed Project would not result in the loss of availability of any known mineral resources or interfere with existing mineral resource extraction activities. Therefore, the Proposed Project would not result in the loss of any known mineral resources, and **no impact** would occur.

⁸⁰ California Geological Survey. 1987. *Special Report 146, Part III: Mineral Land Classification of Aggregate Materials in the North San Francisco Bay Production-Consumption Region*. Sacramento, CA: California Department of Conservation, Division of Mines and Geology.

⁸¹ California Geological Survey. n.d. *Mines Online*. California Department of Conservation. Website: <https://maps.conservation.ca.gov/mol/index.html> (accessed January 29, 2026).

b. Would the project 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?

Refer to Section 4.12.1.a above. The City's General Plan does not identify mineral resources within the City's General Plan planning area. The Proposed Project would not result in the loss of availability of any known locally important mineral resource recovery sites. Therefore, **no impact** would occur, and no mitigation is required.

4.13 NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 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?	☐	☐	☐	☒

Technical Background. The following provides an overview of the characteristics of sound, fundamentals of vibration, and noise and vibration regulatory settings that applies to the Proposed Project.

Characteristics of Sound. Sound is increasing in the environment and can affect quality of life. Noise is usually defined as unwanted sound. Noise consists of any sound that may produce physiological or psychological damage and/or interfere with communication, work, rest, recreation, and sleep.

To the human ear, sound has two significant characteristics: pitch and loudness. Pitch is generally an annoyance, while loudness can affect the ability to hear. Pitch is the number of complete vibrations (or cycles per second) of a wave, resulting in the tone's range from high to low. Loudness is the strength of a sound and describes a noisy or quiet environment; it is measured by the amplitude of the sound wave. Loudness is determined by the intensity of the sound waves combined with the reception characteristics of the human ear. Sound intensity refers to how hard the sound wave strikes an object, which in turn produces the sound's effect. This characteristic of sound can be precisely measured with instruments. The analysis of a project defines the noise environment of the project area in terms of sound intensity and its effect on adjacent sensitive land uses.

Measurement of Sound. Sound intensity is measured through the A-weighted scale to correct for the relative frequency response of the human ear. That is, an A-weighted noise level de-emphasizes low and very high frequencies of sound similar to how the human ear's de-emphasizes these frequencies. Unlike units of measurement that use a linear scale (e.g., inches or pounds), decibels (dB) use a scale based on powers of 10.

For example, 10 dB is 10 times more intense than 0 dB, 20 dB is 100 times more intense than 0 dB, and 30 dB is 1,000 times more intense than 0 dB. Thirty dB represents 1,000 times as much acoustic energy as 0 dB. The dB scale increases as the square of the change, representing the

sound-pressure energy. A sound as soft as human breathing is about 10 times greater than 0 dB. The dB system of measuring sound gives a rough connection between the physical intensity of sound and its perceived loudness to the human ear. A 10 dB increase in sound level is perceived by the human ear as only a doubling of the loudness of the sound. Ambient sounds generally range from 30 A-weighted decibels (dBA) (very quiet) to 100 dBA (very loud).

Sound levels are generated from a source, and their dB level decreases as the distance from that source increases. Sound dissipates exponentially with distance from the noise source. For a single point source, sound levels decrease approximately 6 dB for each doubling of distance from the source. This drop-off rate is appropriate for noise generated by stationary equipment. If noise is produced by a line source, such as highway traffic or railroad operations, the sound decreases 3 dB for each doubling of distance in a hard site environment. Line source noise in a relatively flat environment with absorptive vegetation decreases 4.5 dB for each doubling of distance.

There are many ways to rate noise for various time periods, but an appropriate rating of ambient noise affecting humans also accounts for the annoying effects of sound. The equivalent continuous sound level (L_{eq}) is the total sound energy of time-varying noise over a sample period. However, the predominant rating scales for human communities in California are L_{eq} and the Community Noise Equivalent Level (CNEL) or the day-night average noise level (L_{dn}) based on dBA. CNEL is the time-varying noise over a 24-hour period, with a 5 dBA weighting factor applied to the hourly L_{eq} for noises occurring from 7:00 p.m. to 10:00 p.m. (defined as relaxation hours) and a 10 dBA weighting factor applied to noise occurring from 10:00 p.m. to 7:00 a.m. (defined as sleeping hours). L_{dn} is similar to the CNEL scale but without the adjustment for events occurring during relaxation hours. CNEL and L_{dn} are within 1 dBA of each other and are normally interchangeable. The noise adjustments are added to the noise events occurring during the more sensitive hours.

Other noise rating scales of importance, when assessing the annoyance factor, include the maximum instantaneous noise level (L_{max}), which is the highest exponential time-averaged sound level that occurs during a stated time period. The noise environments discussed in this analysis are specified in terms of L_{max} for short-term noise impacts. L_{max} reflects peak operating conditions and addresses the annoying aspects of intermittent noise.

Another noise scale often used together with L_{max} in noise ordinances for enforcement purposes is noise standards in terms of percentile noise levels. For example, the L_{10} noise level represents the noise level exceeded 10 percent of the time during a stated period. The L_{50} noise level represents the median noise level. Half of the time the noise level exceeds this level, and half of the time it is less than this level. The L_{90} noise level represents the noise level exceeded 90 percent of the time and is considered the background noise level during a monitoring period. For a relatively constant noise source, L_{eq} and L_{50} are approximately the same.

Noise impacts can be described in three categories. The first category, audible impacts, refers to increases in noise levels noticeable to humans. Audible increases in noise levels generally involve a change of 3 dB or greater because that level has been found to be barely perceptible in exterior environments. The second category, potentially audible impacts, refers to a change in

the noise level between 1 and 3 dB. This range of noise levels has been found to be noticeable only in laboratory environments. The last category, inaudible impacts, involves changes in noise levels of less than 1 dB, which are inaudible to the human ear. Only audible changes in existing ambient or background noise levels are considered potentially significant.

Physiological Effects of Noise. Physical damage to human hearing begins at prolonged exposure to noise levels higher than 85 dBA. Exposure to high noise levels affects the entire system, with prolonged noise exposure in excess of 75 dBA increasing body tensions and thereby affecting blood pressure and functions of the heart and the nervous system. In comparison, extended periods of noise exposure above 90 dBA would result in permanent cell damage. When the noise level reaches 120 dBA, a tickling sensation occurs in the human ear, even with short-term exposure. This level of noise is called the threshold of feeling. As the sound reaches 140 dBA, the tickling sensation is replaced by the feeling of pain in the ear. This is called the threshold of pain. A sound level of 160 to 165 dBA will potentially result in dizziness or loss of equilibrium. The ambient or background noise problem is widespread and generally more concentrated in urban areas than in outlying, less-developed areas. Table 4.13.A lists definitions of acoustical terms, and Table 4.13.B shows common sound levels and their noise sources.

Table 4.13.A: Definitions of Acoustical Terms

Term	Definition
Decibel, dB	A unit of noise level that denotes the ratio between two quantities that are proportional to power; the number of decibels is 10 times the logarithm (to the base 10) of this ratio.
Frequency, Hz	Of a function periodic in time, the number of times that the quantity repeats itself in 1 second (i.e., number of cycles per second).
A-Weighted Sound Level, dBA	The sound level obtained by use of A-weighting. The A-weighting filter de-emphasizes the very low- and very high-frequency components of the sound in a manner similar to the frequency response of the human ear and correlates well with subjective reactions to noise. (All sound levels in this report are A-weighted unless reported otherwise.)
L ₂ , L ₈ , L ₅₀ , L ₉₀	The fast A-weighted noise levels that are equaled or exceeded by a fluctuating sound level 2 percent, 8 percent, 50 percent, and 90 percent of a stated time period.
Equivalent Continuous Noise Level, L _{eq}	The level of a steady sound that, in a stated time period and at a stated location, has the same A-weighted sound energy as the time-varying sound.
Community Noise Equivalent Level, CNEL	The 24-hour A-weighted average sound level from midnight to midnight, obtained after the addition of 5 dB to sound levels occurring in the evening from 7:00 p.m. to 10:00 p.m. and after the addition of 10 dB to sound levels occurring in the night between 10:00 p.m. and 7:00 a.m.
Day/Night Noise Level, L _{dn}	The 24-hour A-weighted average sound level from midnight to midnight, obtained after the addition of 10 dB to sound levels occurring in the night between 10:00 p.m. and 7:00 a.m.
L _{max} , L _{min}	The maximum and minimum A-weighted sound levels measured on a sound level meter during a designated time interval using fast-time averaging.
Ambient Noise Level	The all-encompassing noise associated with a given environment at a specified time; usually a composite of sound from many sources from many directions, near and far; no particular sound is dominant.
Intrusive	The noise that intrudes over and above the existing ambient noise at a given location. The relative intrusiveness of a sound depends on its amplitude, duration, frequency, time of occurrence, and tonal or informational content, as well as the prevailing ambient noise level.

Source: *Handbook of Acoustical Measurements and Noise Control* (Harris 1991).

Table 4.13.B: Common Sound Levels and Their Noise Sources

Noise Source	A-Weighted Sound Level in Decibels	Noise Environments	Subjective Evaluations
Near Jet Engine	140	Deafening	128 times as loud
Civil Defense Siren	130	Threshold of Pain	64 times as loud
Hard Rock Band	120	Threshold of Feeling	32 times as loud
Accelerating Motorcycle a Few Feet Away	110	Very Loud	16 times as loud
Pile Driver; Noisy Urban Street/Heavy City Traffic	100	Very Loud	8 times as loud
Ambulance Siren; Food Blender	95	Very Loud	—
Garbage Disposal	90	Very Loud	4 times as loud
Freight Cars; Living Room Music	85	Loud	—
Pneumatic Drill; Vacuum Cleaner	80	Loud	2 times as loud
Busy Restaurant	75	Moderately Loud	—
Near-Freeway Auto Traffic	70	Moderately Loud	Reference Level
Average Office	60	Quiet	½ as loud
Suburban Street	55	Quiet	—
Light Traffic; Soft Radio Music in Apartment	50	Quiet	¼ as loud
Large Transformer	45	Quiet	—
Average Residence without Stereo Playing	40	Faint	⅛ as loud
Soft Whisper	30	Faint	—
Rustling Leaves	20	Very Faint	—
Human Breathing	10	Very Faint	Threshold of Hearing

Source: Compiled by LSA (2026).

Fundamentals of Vibration. Vibration refers to ground-borne noise and perceptible motion. Ground-borne vibration is almost exclusively a concern inside buildings and is rarely perceived as a problem outdoors where the motion may be discernible. However, without the effects associated with the shaking of a building, there is less adverse reaction. Vibration energy propagates from a source through intervening soil and rock layers to the foundations of nearby buildings. The vibration then propagates from the foundation throughout the remainder of the structure. Building vibration may be perceived by occupants as motion of building surfaces, the rattling of items on shelves or hanging on walls, or a low-frequency rumbling noise. The rumbling noise is caused by the vibrating walls, floors, and ceilings radiating sound waves. Building damage is not a factor for normal operation and construction activities with the occasional exception of blasting and pile driving during construction.

Typical sources of ground-borne vibration are construction activities (e.g., blasting, pile driving, and operating heavy-duty earthmoving equipment), steel-wheeled trains, and occasional traffic on rough roads. Impacts with ground-borne vibration and noise from these sources are usually localized to areas within approximately 100 feet of the vibration source, although there are examples of ground-borne vibration causing interference out to distances greater than 200 feet (Federal Transit Administration [FTA] *Transit Noise and Vibration Impact Assessment Manual*

(FTA Manual).⁸² When roadways are smooth, vibration from traffic, even heavy trucks, is rarely perceptible. For most projects, it is assumed that the roadway surface will be smooth enough that ground-borne vibration from street traffic will not exceed the impact criteria; however, construction activities have the potential to result in ground-borne vibrations that could be perceptible and annoying. Ground-borne noise is not likely to be a problem because noise arriving via the normal airborne path usually will be greater than ground-borne noise.

Ground-borne vibration has the potential to disturb people as well as damage buildings. Although it is very rare for ground-borne vibration to cause even cosmetic building damage, it is not uncommon for construction processes such as blasting and pile driving to cause vibration of sufficient amplitudes to damage nearby buildings. Ground-borne vibration is usually measured in terms of vibration velocity, either the root-mean-square (RMS) velocity or peak particle velocity (PPV). RMS is best for characterizing human response to building vibration, and PPV is used to characterize the potential for damage. Decibel notation acts to compress the range of numbers required to describe vibration. Vibration velocity level in dB is defined as:

$$L_v = 20 \log_{10} [V/V_{ref}]$$

where L_v is the velocity in decibels (VdB), “V” is the RMS velocity amplitude, and “ V_{ref} ” is the reference velocity amplitude, or 1×10^{-6} inches per second (in/sec) used in the United States.

Regulatory Setting

Federal Guidelines

Federal Transit Administration. The construction noise criteria included in the Federal Transit Administration (FTA) *Transit Noise and Vibration Impact Assessment Manual* (2018) was used to evaluate potential construction noise impacts, as the City of Napa does not have construction noise level standards in their Municipal Code. Table 4.13.C shows the FTA’s Detailed Assessment Daytime Construction Noise Criteria based on the composite noise levels for each construction phase.

Table 4.13.C: Detailed Assessment Daytime Construction Noise Criteria

Land Use	Daytime 1-hour L_{eq} (dBA)
Residential	80
Commercial	85
Industrial	90

Source: Table 7-3, *Transit Noise and Vibration Impact Assessment Manual* (FTA 2018).

dBA = A-weighted decibels

L_{eq} = equivalent continuous sound level

⁸² Federal Transit Administration (FTA). 2018. *Transit Noise and Vibration Impact Assessment Manual*. FTA Report No. 0123. September. Website: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf (accessed May 2026).

State Guidelines

California Department of Transportation. Vibration standards included in the 2020 California Department of Transportation (Caltrans) Transportation and Construction Vibration Guidance Manual (Caltrans Manual)⁸³ are used to evaluate ground-borne vibration impacts on human annoyance and building damage. The criteria for environmental impact from ground-borne vibration are based on the maximum levels for a single event and the RMS vibration level. Table 4.13.D provides the criteria for assessing the potential for interference or annoyance. Table 4.13.E lists the potential vibration building damage criteria associated with construction activities, as suggested in the Caltrans Manual.

Table 4.13.D: Interpretation of Vibration Criteria for Detailed Analysis

Human Response	Vibration Level (RMS in/sec)
Barely perceptible	0.01
Distinctly perceptible	0.04
Strongly perceptible	0.10
Severe	0.40

Source: *Transportation and Construction Vibration Guidance Manual* (Caltrans 2020).

in/sec = inch/inches per second

RMS = root-mean-square

Table 4.13.E: Construction Vibration Damage Criteria

Structure/Condition	PPV (in/sec)
Extremely fragile historic buildings, ruins, ancient monuments	0.08
Fragile buildings	0.10
Historic and some old buildings	0.25
Older residential structures	0.30
New residential structures	0.50
Modern industrial/commercial buildings	0.50

Source: *Transportation and Construction Vibration Guidance Manual*, Table 19 (Caltrans 2020).

FTA = Federal Transit Administration

in/sec = inches per second

PPV = peak particle velocity

⁸³ California Department of Transportation (Caltrans). 2020. Transportation and Construction Vibration Guidance Manual. April. Website: <https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tcvgm-apr2020-a11y.pdf> (accessed May 2026).

Local Regulations

City of Napa General Plan Safety and Noise Element. The City's General Plan Noise Element⁸⁴ has established stationary and mobile-source noise standards shown in Tables 4.13.F and 4.13.G, respectively and has policies to meet the City's noise-related goals. Applicable goals and policies for the project are listed below:

Table 4.13.F: Noise Generation Performance Standards for Non-Transportation Sources

Noise Level Descriptor	Daytime (7:00 a.m. to 10:00 p.m.)	Nighttime (10:00 p.m. to 7:00 a.m.)
Hourly L_{eq} , dBA	55	45
Maximum Level, dBA	75	65

Source: City of Napa General Plan, Safety and Noise Element, Table 8-4

Note: Each of the noise levels specified above shall be lowered by 5 dBA for simple tone noises, noises consisting primarily of speech or music, or for recurring impulsive noises.

Table 4.13.G: Allowable Noise Exposure from Transportation Sources

Land Use	Noise Level (dBA CNEL)	
	Outdoor Activity Areas ^{1 2}	Interior Spaces
Residential	60 ³	45
Motel, Hotels	65	45
Hospitals, Residential Care Facilities, Schools, Libraries, Museums, Churches, Day Care Facilities	65	45
Playgrounds, Parks, Recreation Uses	65	50
Commercial and Office Uses	65	50
Industrial Uses	70	65

Source: City of Napa General Plan, Safety and Noise Element, Table 8-6

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

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

³ An exterior noise exposure level of 65 dBA CNEL is allowable for residential uses in a mixed-use project.

Goal SN-4: Protect public health and welfare by minimizing exposure of sensitive uses to noise and preventing significant degradation of the acoustic environment.

SN 4-3: Discourage the use of berms and sound walls for noise mitigation; rather, encourage the use of project design techniques such as increasing the distance between the noise source and the noise sensitive receiver and use non-noise sensitive structures (e.g., a garage) to shield noise sensitive areas.

⁸⁴ City of Napa. 2022. 2040 General Plan. October. Website: <https://www.cityofnapa.org/259/General-Plan#docaccess-39ed5e4672b359e9a7abae05587b16ab0ed5242f4c076346ff7296241cf56df0> (accessed May 2026).

If a berm or wall is determined necessary to mitigate noise, discourage exclusive use of walls in excess of six feet in height and encourage use of natural barriers such as site topography or constructed earthen berms. When walls are determined to be the only feasible solution to noise mitigation, then the walls shall be designed to limit aesthetic impacts.

- SN 4-4:** Ensure that new development does not generate noise in excess of the performance standards outlined in Table 8-4 (Table 4.13.F), whenever feasible.
- SN 4-5:** Evaluate designated truck routes to reduce noise impacts due to through traffic in residential neighborhoods.
- SN 4-7:** Address appropriate construction noise and vibration control measures, standards, and monitoring procedures for future development in the City's Municipal Code to reduce impacts to nearby uses.
- SN 4-8:** Require all construction within 1,000 feet of noise-sensitive uses to undertake measures to reduce noise impacts. Within 100 feet of pile driving locations and 25 feet of construction sites using other non-impact equipment (dozers, excavators, etc.), require all construction to undertake measures to prevent possible exposure of vibration-sensitive buildings and receptors to substantial ground borne vibration levels.

City of Napa Municipal Code. Section 8.08.025 of the City's Municipal Code⁸⁵ limits construction activity, other than construction activity on an existing residential unit which such person owns or rents, pursuant to any provision of this code, shall limit said construction activity as follows:

- A. Construction activities throughout the entire duration of the project shall be limited to the hours of 7:00 a.m. to 7:00 p.m., Monday through Friday. There will be no start-up of machines nor equipment prior to 8:00 a.m., Monday through Friday; no delivery of materials nor equipment prior to 7:30 a.m. nor past 5:00 p.m., Monday through Friday; no cleaning of machines nor equipment past 6:00 p.m., Monday through Friday; no servicing of equipment past 6:45 p.m., Monday through Friday; and construction on weekends or legal holidays shall be limited to the hours of 8:00 a.m. to 4:00 p.m., unless a permit shall first have been secured from the City Manager, or designee, pursuant to Section 8.08.050 of this code. The City Manager, or designee, shall grant such permit:
1. For emergency work;
 2. Other work, if work and equipment will not create noise that may be unreasonably offensive to neighbors as to constitute a nuisance; or

⁸⁵ City of Napa. 2026. Municipal Code, Section 8.08.025. March 17. Website: <https://ecode360.com/43391410?highlight=noise&searchId=1862607118401289#43391410> (accessed May 2026).

3. If necessary to protect the public health, safety, and welfare.
- B. All muffler systems on construction equipment shall be properly maintained.
 - C. All construction equipment shall not be placed adjacent to developed areas unless said equipment is provided with acoustical shielding.
 - D. All construction and grading equipment shall be shut down when not actively in use.
 - E. Construction activity by or on behalf of a public agency, which is necessary to avoid a disruption of a public project or to protect the public health, safety, and welfare, shall be exempt from the time limitations of this section.
 - F. As a separate, distinct, and cumulative remedy established for a violation of this section, the Police and/or the Code Enforcement Officer may issue a stop work order for violation of this section. Such order shall become effective immediately upon posting of the notice. After service of the stop work order, no person shall perform any act with respect to the subject property in violation of any of the terms of the stop work order, except such actions the city determines are reasonably necessary to render the subject property safe and/or secure until the violation has been corrected.

Existing Setting

Overview of the Existing Ambient Noise Environment. Transportation facilities are the primary existing noise sources in the project area. Traffic noise in the project area includes Kaiser Road, Syar Way, and other local roadways. Industrial activities to the north, east, and west contribute to the noise environment in the project area.

Surrounding Land Uses. Land uses surrounding the Project Site include industrial to the north, east, and west. Residential land uses are located to the south. The closest structure is the industrial building located approximately 50 feet east of the project boundary. The closest residence is located approximately 565 feet south from the center of the Project Site.

Ambient Noise Levels. Two (2) long-term (24-hour) noise level measurements were conducted from December 3 to December 4, 2025, using Larson Davis Spark dosimeters. Table 4.13.H summarizes the results of the long-term noise level measurements along with a description of the measurement location and noise sources that occurred during the measurement. As shown in Table 4.13.H, the daytime noise levels ranged from 49.3 to 60.4 dBA L_{eq} and nighttime noise levels ranged from 45.1 to 59.3 dBA L_{eq} . The daytime maximum instantaneous noise level ranged from 67.5 to 84.5 dBA and the nighttime instantaneous maximum noise level ranged from 61.9 to 85.6 dBA. Also, the calculated CNEL level at LT-1 and LT-2 were 60.5 dBA and 61.0 dBA, respectively. The long-term noise level measurement survey sheets along with the detailed hourly L_{eq} , L_{max} , and minimum measured sound level (L_{min}) results are provided in **Appendix F1** of this IS/MND. **Figure 4.13-1** shows the long-term monitoring locations.



LSA



0 80 160
FEET

LEGEND

-  Project Site Boundary
-  Long-term Noise Monitoring Location

FIGURE 4.13-1

Table 4.13.H: Long-Term Ambient Noise Monitoring Results

Monitor No.	Location	Noise Level (dBA)					Noise Sources
		Daytime		Nighttime		CNEL	
		Leq	Lmax	Leq	Lmax		
LT-1	On a tree south of Kaiser Road near the newly built residential units. Approximately 50 ft from Kaiser Road centerline.	49.3-58.5 (56.0) ¹	67.5-80.5	45.1-59.3 (53.4) ²	62.2-85.6	60.5	Traffic on Kaiser Road. Industrial activity west of the Project Site from CMC Rebar (Steel Fabricator). Noise sources include trucks noise, forklift back up alarm, noise from material colliding and pouring noise.
LT-2	On a tree north of Kaiser Road. On the Project Site, approximately 90 ft from Kaiser Road centerline.	50.6-60.4 (56.8) ¹	69.5-84.5	43.4-57.9 (53.6) ²	61.9-78.4	61.0	Traffic on Kaiser Road. Industrial activity west of the Project Site from CMC Rebar (Steel Fabricator). Noise sources include trucks noise, forklift back up alarm, noise from material colliding and pouring noise.

Source: Compiled by LSA (2026).

Note: Long-term (24-hour) noise level measurements were conducted from December 3, 2025, to December 4, 2025.

¹ Average daytime noise levels.

² Average nighttime noise levels.

CNEL = Community Noise Equivalent Level

dBA = A-weighted decibels

ft = foot/feet

Leq = equivalent continuous sound level

Lmax = maximum instantaneous noise level

4.13.1 Impact Analysis

- a. *Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

Short-Term Construction Noise Impacts. Two (2) types of short-term noise impacts could occur during construction on the Project Site. First, construction crew commutes and the transport of construction equipment and materials to the site for the Proposed Project would incrementally increase noise levels on roads leading to the site. The heavy equipment for construction activities will be moved on site, will remain for the duration of each construction phase, and will not add to the daily traffic volume in the project vicinity. Although there would be a relatively high single-event noise exposure potential causing intermittent noise nuisance (passing trucks at 50 feet would generate up to a maximum of 84 dBA), the effect on longer-term (daily) ambient noise levels would be small because the daily construction-related vehicle trips are small compared to the existing daily traffic volume on Kaiser Road, which would be used to access the Project Site. The results of the California Emissions Estimator Model (CalEEMod)(version 2022.1) contained in **Appendix A1** of this IS/MND indicate that the grading phase would generate the most trips out of all of the construction phases and have an acoustical equivalent traffic volume of 1,787 passenger car equivalent vehicles on Kaiser Road. Based on the *City's Annual Traffic Count Summary*⁸⁶, Kaiser Road has an estimated existing average daily traffic (ADT) volume of 5,411 near the Project Site. Based on the information above, construction-related traffic would increase noise levels by up to 1.2 dBA. A noise level increase of less than 3 dBA would not be perceptible to the human ear in an outdoor environment. Therefore, short-term construction-related noise impacts associated with worker commute and

⁸⁶ City of Napa. 2024. *Public Works Department Development Engineering Division 2023 Annual Traffic Count Data*. January. Website: https://www.dropbox.com/scl/fi/6i1hpbfg486rahm47yz0/PL23-0135-Kaiser-Rd-Warehouse_2023-Annual-Traffic-Count-Data-Report.pdf?rlkey=y1sstl8uk12flktejf7ip2qj5&st=222rn3mu&e=1&dl=0 (accessed July 2026).

equipment transport to the Project Site would be **less than significant**. No mitigation measures are required.

The second type of short-term noise impact is related to noise generated from construction activities. Construction is performed in discrete steps, each of which has its own mix of equipment and, consequently, its own noise characteristics. The Proposed Project anticipates site preparation, grading, building construction, paving, and architectural coating phases of construction. These various sequential phases change the character of the noise generated on a project site. Therefore, the noise levels vary as construction progresses. Despite the variety in the type and size of construction equipment, similarities in the dominant noise sources and patterns of operation allow construction-related noise ranges to be categorized by work phase. Table 4.13.I lists the L_{max} recommended for noise impact assessments for typical construction equipment included in the Federal Highway Administration (FHWA) *Highway Construction Noise Handbook* (FHWA 2006), based on a distance of 50 feet between the equipment and a noise receptor.

Table 4.13.I: Typical Construction Equipment Noise Levels

Equipment Description	Acoustical Use Factor ¹	Maximum Noise Level (L_{max}) at 50 ft ²
Backhoe	40	80
Compactor (ground)	20	80
Compressor (air)	40	80
Crane	16	85
Dozer	40	85
Drill Rig Truck	20	84
Dump Truck	40	84
Excavator	40	85
Flatbed Truck	40	84
Forklift	20	85
Front-End Loader	40	80
Generator	50	82
Grader	40	85
Impact Pile Driver	20	95
Jackhammer	20	85
Pavement Scarafier	20	85
Paver	50	85
Pickup Truck	40	55
Pneumatic Tools	50	85
Pump	50	77
Rock Drill	20	85
Roller	20	85
Scraper	40	85
Tractor	40	84
Welder/Torch	40	73

Source: FHWA *Highway Construction Noise Handbook*, Table 9.1 (FHWA 2006).

Note: The noise levels reported in this table are rounded to the nearest whole number.

¹ The acoustical use factor is the percentage of time during a construction noise operation that a piece of construction equipment is operating at full power.

² Maximum noise levels were developed based on Spec 721.560 from the CA/T program to be consistent with the City of Boston, Massachusetts, Noise Code for the "Big Dig" project.

Table 4.13.I: Typical Construction Equipment Noise Levels

Equipment Description	Acoustical Use Factor ¹	Maximum Noise Level (L _{max}) at 50 ft ²
CA/T = Central Artery/Tunnel		
FHWA = Federal Highway Administration		
ft = foot/feet		
L _{max} = maximum instantaneous noise level		

Table 4.13.J lists the anticipated construction equipment for each construction phase based on the CalEEMod results contained in **Appendix A1** of this IS/MND. Table 4.13.J shows the combined noise level at 50 feet from all of the equipment in each phase and the L_{eq} noise level for each equipment at 50 feet based on the quantity, reference L_{max} noise level at 50 feet, and the acoustical use factor. As shown in Table 4.13.J, construction noise levels would reach up to 88.8 dBA L_{eq} at a distance of 50 feet.

Table 4.13.J: Summary of Construction Phase, Equipment, and Noise Levels

Construction Phase	Construction Equipment	Quantity	Reference Noise Level at 50 ft (dBA L _{max})	Acoustical Use Factor ¹ (%)	Noise Level ² at 50 ft (dBA L _{eq})	Combined Noise Level ³ at 50 ft (dBA L _{eq})
Site Preparation	Dozer	3	85	40	85.8	87.3
	Front End Loader	4	80	40	82.0	
Grading	Excavator	1	85	40	81.0	88.8
	Grader	1	85	40	81.0	
	Dozer	1	85	40	81.0	
	Front End Loader	3	80	40	80.8	
	Scraper	2	85	40	84.0	
Building Construction	Crane	1	85	16	77.0	86.5
	Man Lift	3	85	20	82.8	
	Generator	1	82	50	79.0	
	Front End Loader	3	80	40	80.8	
	Welder / Torch	1	73	40	69.0	
Paving	Paver	2	85	50	85.0	87.6
	Pavement Scarafier	2	85	20	81.0	
	Roller	2	85	20	81.0	
Architectural Coating	Compressor (air)	1	80	40	76.0	76.0

Source: Compiled by LSA (2026).

¹ The acoustical use factor is the percentage of time during a construction noise operation that a piece of construction equipment operates at full power.

² The formula for calculating the noise level for each construction equipment based on the quantity and acoustical use factor is provided in the FHWA Roadway Construction Noise Model User's Guide.

³ The combined noise level is calculated using the following formula: $SPL = 10 \cdot \log(10^{(L_1/10)} + 10^{(L_2/10)} \dots + 10^{(L_n/10)})$.
L₁, L₂,...L_n are the individual noise levels.

dBA = A-weighted decibels

L_{eq} = equivalent continuous sound level

ft = foot/feet

L_{max} = maximum instantaneous noise level

The closest residential property line from the center of the Project Site is approximately 565 feet and would be exposed to project construction noise levels reaching up to 67.7 dBA L_{eq}. The center of

the Project Site is an appropriate location to predict a typical construction noise condition over an hour-long assessment period because equipment during the loudest phases of construction, such as grading, will transverse the site and not remain stationary. Although noise generated by project construction activities would be higher than the ambient noise levels and may result in a temporary increase in the ambient noise levels, construction noise would stop once project construction is completed. Also, construction-related noise levels would be below the FTA noise level standards of 80 dBA L_{eq} for residential uses. The implementation of Regulatory Compliance Measure N-1, which includes limiting construction activities to between the hours of 7:00 a.m. and 7:00 p.m., Monday through Friday and between the hours of 8:00 a.m. and 4:00 p.m., on weekends or legal holidays pursuant to Section 8.08.025 of the City Municipal Code, would minimize disturbance to nearby land uses. Therefore, with the implementation of **Regulatory Compliance Measure (RCM) N-1**, noise generated from project construction activities would be **less than significant**.

RCM N-1

Prior to and during construction, the following measures shall be implemented to minimize construction noise and comply with Section 8.08.025 of the City of Napa's Municipal Code.

- **Construction Hours.** The construction contractor shall limit construction activities to between the hours of 7:00 a.m. and 7:00 p.m. Monday through Friday. No start-up of machines nor equipment prior to 8:00 a.m., Monday through Friday. No delivery of materials nor equipment prior to 7:30 a.m. nor past 5:00 p.m., Monday through Friday. No cleaning of machines nor equipment past 6:00 p.m., Monday through Friday. No servicing of equipment past 6:45 p.m., Monday through Friday. Construction on weekends or legal holidays shall be limited to between the hours of 8:00 a.m. and 4:00 p.m., unless a permit has been secured from the City Manager, or designee, pursuant to Section 8.08.050 of the City Municipal Code.
- **Muffler Systems.** The construction contractor shall equip all construction equipment, fixed or mobile, with properly operating and maintained noise mufflers consistent with manufacturer's standards.
- **Construction Equipment.** The construction contractor shall place all construction equipment away from developed areas unless it is equipped with acoustical shielding.
- **Construction Equipment Operations.** The construction contractor shall shut down all construction and grading equipment when not actively in use.

Long-Term Traffic Noise Impacts. The project is estimated to generate 411 daily trips based on 130,373 square feet of high-cube fulfillment center warehouse (Land Use 155), 23,007 square feet of general office (Land Use 710), and trip rates from the 12th Edition Institute of Transportation

Engineers (ITE) *Trip Generation Manual*.⁸⁷ The project trip generation calculation is provided in **Appendix F2** of this IS/MND. The existing 2018 ADT volume on Kaiser Road between Basalt Road and Highway 221 used to access the Project Site is 6,929 based on the City's Annual Traffic Count Summary.⁸⁸ Based on the information above, project-related traffic noise would increase noise by 0.3 dBA. A noise level increase of less than 3 dBA would not be perceptible to the human ear in an outdoor environment. Therefore, traffic noise impacts from project-related traffic on off-site sensitive receptors would be **less than significant**. No mitigation measures are required.

Long-Term Stationary Noise Impacts. Delivery trucks and truck loading and unloading activities, parking activities, fire pump, and heating, ventilation, and air conditioning (HVAC) equipment associated with the project would potentially affect the existing off-site sensitive land uses. The following provides a detailed noise analysis and discussion of each stationary noise source.

- **Truck Delivery and Truck Loading and Unloading Activities.** Truck delivery and truck loading/unloading activities for the Proposed Project would be on the west side of the proposed industrial warehouse building. These activities would take place during both daytime and nighttime hours. Noise levels generated from these activities include truck movement, docking at loading dock doors, backup alarms, air brakes, idling, and loading and unloading activities. These activities would be similar to noise readings from truck loading and unloading activities, which generate a noise level of 75 dBA L_{eq} at 20 feet based on measurements conducted by LSA.⁸⁹ At a distance of 50 feet, noise levels would be 67 dBA L_{eq} . Although a typical truck-unloading process takes an average of 15–20 minutes, this noise level occurs in a much shorter period of time (less than 5 minutes). Also, it is estimated that there would be a maximum of 6 delivery trucks per hour during daytime hours and 3 delivery trucks per hour during nighttime hours based on the project trip generation calculations provided in **Appendix F2** of this IS/MND and that each truck would generate the noise level for a cumulative period of 5 minutes. Based on the assumptions above, truck delivery and truck loading and unloading activities would result in a cumulative period of 30 minutes during daytime hours and 15 minutes during nighttime hours, which would result in a noise level of 64.0 and 61.0 dBA L_{eq} , respectively, at 50 feet. The closest residential property line to the center of project's truck loading/unloading dock is approximately 520 feet. Additionally, the 12 feet high screen wall at the southwest corner of the industrial warehouse building would provide a minimum noise reduction of 5 dBA.
- **Parking Activity.** The Proposed Project would include surface parking for automobiles on the north, east, and west side of the Project Site. Parking activities would include noise generated by vehicles traveling at slow speeds, engine start-up noise, car door slams, car horns, car alarms, and tire squeals. Representative parking activities would generate a noise level of 68.3 dBA L_{eq} at 50 feet based on measurements conducted by LSA.⁹⁰ It is estimated that there would be a maximum of 40 automobiles per hour during daytime hours and 12 automobile per hour during nighttime hours based on the project trip generation calculations provided in **Appendix F-2** of

⁸⁷ Institute of Transportation Engineers (ITE). 2025. *Trip Generation Manual*, 12th Edition. August.

⁸⁸ City of Napa. 2019. *Annual Traffic Count Summary*. Website: <https://www.cityofnapa.org/DocumentCenter/View/5468/2019-City-of-Napa-Traff-Count-Summary> (accessed May 2026).

⁸⁹ LSA Associates, Inc. 2016. *Operational Noise Impact Analysis for Richmond Wholesale Meat Distribution Center*. May.

⁹⁰ Ibid.

this IS/MND and that each automobile would generate the noise level for a cumulative period of 1 minute. Based on the assumptions above, automobile parking activities would result in a cumulative period of 40 minutes during daytime hours and 12 minutes during nighttime hours. Additionally, of the 40 minutes during daytime hours, 14 minutes were assumed to be associated with the northern and eastern parking area and 12 minutes were assumed to be associated with the western parking area, which would result in a noise level of 62.0, 62.0, and 61.3 dBA L_{eq} , respectively, at 50 feet. Similarly, of the 12 minutes during nighttime hours, 4 minutes were assumed for the three parking areas (northern, eastern, and western), which would result in a noise level of 56.5 dBA L_{eq} at 50 feet. The distance to the nearest residential property line from the center of each parking area was approximately 960, 520, and 515 feet, respectively. The proposed industrial warehouse building would shield the nearby residential units from parking activities north of the industrial building, which would provide a minimum noise level reduction of 5 dBA. The proposed industrial warehouse building would also partially shield the residential units from parking activities east of the industrial building, which would provide a minimum noise level reduction of 3 dBA.

- **HVAC Noise.** The Proposed building design would include up to 12 rooftop HVAC units a minimum of 15 feet from the edge of the eastern facade of the building, based on the roof plan. The HVAC equipment could operate up to 24 hours per day. The specifications of the HVAC equipment, including the reference noise level, are provided in **Appendix F3** of this IS/MND. Each rooftop HVAC unit would generate a sound power level of 79 dBA, which would be equivalent to 47.4 dBA L_{eq} at a distance of 50 feet. The operation of all 12 rooftop HVAC units would contribute to a noise level of 40.7 dBA L_{eq} at the closest residential property line. The detailed HVAC noise calculations are provided in **Appendix F4** of this IS/MND.
- **Fire Pump.** The Proposed Project would include a 215 horsepower (hp) diesel engine fire pump that would be located in the middle of the west facing concrete wall and be housed in a small pump house in an enclosed room within the warehouse building. The fire pump would be used for emergencies and would include regular testing during daytime hours (between 7:00 a.m. and 10:00 p.m.) for 15-minute periods. The fire pump reference noise levels are provided in **Appendix F5** of this IS/MND. The diesel engine would generate a noise level of 104.57 dBA L_{eq} at 3.3 feet and the exhaust engine noise would generate a noise level of 110.2 dBA L_{eq} at 23 feet. The combined noise level at a distance of 50 feet would be 103.5 dBA. Noise generated from the fire pump during regular testing is not expected to be perceptible at the closest residential property line south of the Project Site because the fire pump would be located either in a small concrete or masonry block wall pump house, or in an enclosed room within the proposed warehouse building.
- **Stationary Noise Impacts Summary.** Table 4.13.K shows the individual stationary noise source from delivery trucks and truck loading and unloading activities, automobile parking activities, and rooftop HVAC equipment at the closest residential property line south of the Project Site. Noise evaluations considered the daytime and nighttime reference noise level, distance from the center of the activity to the property line, noise reduction from distance attenuation, noise reduction from shielding, daytime and nighttime noise level from each noise source, and the combined stationary noise level. As shown in Table 4.13.K, noise levels at the closest residential

property line south of the Project Site generated from project operations would result in a combined stationary daytime and nighttime noise level of 46.1 and 43.4 dBA L_{eq} , respectively. Noise levels generated by project operations would not exceed the City's daytime and nighttime noise standards of 55 and 45 dBA L_{eq} , respectively. Additionally, the ambient noise increase would reach up to 0.4 dBA based on the average daytime and nighttime ambient noise level of 56.0 and 53.4 dBA L_{eq} , respectively, at LT-1. A noise level increase of less than 3 dBA would not be perceptible to the human ear in an outdoor environment. Therefore, noise impacts from project operations would be **less than significant**. No mitigation measures are required.

Table 4.13.K: Stationary Noise Levels

Land Use	Direction	Noise Source	Reference Noise Level at 50 ft (dBA L_{eq})	Distance ¹ (ft)	Distance Attenuation (dBA)	Shielding (dBA)	Noise Level (dBA L_{eq})	Combined Noise Level (dBA L_{eq})
Residences	South	Truck Loading	64.0/61.0	520	20.3	5 ²	38.7/35.7	46.1/43.4
		North Parking Area	62.0/56.5	960	25.7	5 ³	31.3/25.8	
		East Parking Area	62.0/56.5	520	20.3	3 ⁴	38.7/33.2	
		West Parking Area	61.3/56.5	515	20.3	0	41.0/36.2	
		HVAC	-- ⁵	--	--	--	40.7/40.7	

Source: Compiled by LSA (2026).

¹ Distance from center of the activity to the property line.

² The 12 ft high screen wall at the southwest corner of the industrial warehouse building would provide a minimum noise reduction of 5 dBA.

³ The proposed industrial warehouse building would shield the residences from parking activities and provide a minimum noise attenuation of 5 dBA.

⁴ The proposed industrial warehouse building would partially shield residences from parking activities and provide a minimum noise attenuation of 3 dBA.

⁵ The detailed HVAC noise analysis is provided in Appendix F-4 of this IS/MND.

dBA = A-weighted decibel(s)

ft = feet/foot

L_{eq} = equivalent continuous sound level

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

Short-Term Construction Vibration Impacts. This construction vibration impact analysis discusses the level of human annoyance and assesses the potential for building damage using vibration levels in PPV (in/sec). Vibration levels calculated in RMS velocity are best for characterizing human response to building vibration, whereas vibration levels in PPV are best for characterizing damage potential.

Table 4.13.L shows the reference vibration levels at a distance of 25 feet for each type of standard construction equipment from the Transit Noise and Vibration Impact Assessment Manual.⁹¹ Project construction is expected to require the use of large bulldozers and loaded trucks which would

⁹¹ Federal Transit Administration (FTA). 2018. *Transit Noise and Vibration Impact Assessment Manual*. FTA Report No. 0123. September. Website: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf (accessed May 2026).

generate ground-borne vibration levels of up to 0.089 in/sec PPV-max (0.062 in/sec PPV-RMS) and 0.076 in/sec PPV-max (0.053 in/sec PPV-RMS), respectively, when measured at 25 feet.

Table 4.13.L: Vibration Source Amplitudes for Construction Equipment

Equipment	Reference PPV/L _v at 25 ft	
	Maximum PPV (in/sec)	RMS PPV (in/sec) ¹
Pile Driver (Impact), Typical	0.644	0.451
Pile Driver (Sonic), Typical	0.170	0.119
Vibratory Roller	0.210	0.147
Hoe Ram	0.089	0.062
Large Bulldozer²	0.089	0.062
Caisson Drilling	0.089	0.062
Loaded Trucks²	0.076	0.053
Jackhammer	0.035	0.025
Small Bulldozer	0.003	0.002

Source: *Transportation and Construction Vibration Guidance Manual* (Caltrans 2020).

¹ RMS vibration velocity is 70 percent of the maximum PPV.

² Equipment shown in bold is expected to be used on site.

μin/sec = microinches per second

Caltrans = California Department of Transportation

ft = foot/feet

in/sec = inches per second

L_v = velocity in decibels

PPV = peak particle velocity

RMS = root-mean-square

The greatest vibration levels are anticipated to occur during the site preparation and grading phase. All other phases are expected to result in lower vibration levels. The distance to the nearest buildings for vibration impact analysis is measured between the nearest off-site buildings and the project boundary (assuming the construction equipment would be used at or near the project boundary) because vibration impacts normally occur within the buildings.

The formula for vibration transmission is provided below:

$$PPV_{\text{equip}} = PPV_{\text{ref}} \times (25/\text{Distance})^{1.1}$$

Table 4.13.M lists the projected vibration levels from various construction equipment expected to be used from the center of the Project Site to the nearest buildings in the project vicinity. Similar to construction noise, the center of site is the appropriate location to predict a typical construction vibration condition over the period of an hour to assess annoyance potential because equipment during the most intense phases of construction, such as demolition and grading, will transverse the site and not remain stationary. As shown in Table 4.13.M, the closest building is approximately 290 feet from the center of the Project Site and would experience a vibration level of up to 0.004 in/sec (PPV-RMS). This vibration level would not have the potential to result in annoyance because vibration levels would not exceed the Caltrans annoyance threshold of 0.04 in/sec (PPV-RMS). Other buildings surrounding the Project Site would experience lower vibration levels because they are farther away.

Table 4.13.M: Potential Construction Vibration Annoyance

Land Use	Direction	Equipment/ Activity	Reference Vibration Level at 25 ft (in/sec [PPV-RMS])	Distance to Structure (ft) ¹	Vibration Level (in/sec [PPV-RMS])
Industrial	East	Large Bulldozers	0.062	290	0.004
		Loaded Trucks	0.053	290	0.004
Residential	South	Large Bulldozers	0.062	580	0.002
		Loaded Trucks	0.053	580	0.002
Industrial	West	Large Bulldozers	0.062	400	0.003
		Loaded Trucks	0.053	400	0.003

Source: Compiled by LSA (2026).

Note: The Caltrans annoyance threshold is 0.04 RMS (in/sec).

¹ Distance from the center of the Project Site to the building structure.

Caltrans = California Department of Transportation

ft = foot/feet

in/sec = inches per second

PPV = peak particle velocity

RMS = root-mean-square

Table 4.13.N lists the projected vibration levels from various construction equipment expected to be used on the Project Site at the project construction boundary to the nearest buildings in the project vicinity. The construction boundary is the appropriate location to assess the potential for vibration damage, which would occur during a peak condition, because the vibration criteria used is a peak particle velocity. As shown in Table 4.13.N, the closest building structure is approximately 50 feet from the project construction boundary and would experience a vibration level of up to 0.042 in/sec (PPV). This vibration level would not result in building damage, since nearby residential and industrial buildings are relatively new, and the anticipated project-related vibration levels would not exceed the Caltrans vibration damage threshold of 0.50 in/sec (PPV) for modern buildings. Other buildings surrounding the Project Site would experience lower vibration levels because they are farther away and are also relatively new construction. Therefore, vibration levels generated from project construction would be **less than significant**, and no mitigation is required.

Table 4.13.N: Potential Construction Vibration Damage

Land Use	Direction	Equipment/ Activity	Reference Vibration Level at 25 ft (in/sec [PPV-max])	Distance to Structure (ft) ¹	Vibration Level (in/sec [PPV-max])
Industrial	East	Large Bulldozers	0.089	50	0.042
		Loaded Trucks	0.076	50	0.035
Residential	South	Large Bulldozers	0.089	100	0.019
		Loaded Trucks	0.076	100	0.017
Industrial	West	Large Bulldozers	0.089	110	0.017
		Loaded Trucks	0.076	110	0.015

Source: Compiled by LSA (2026).

Note: The Caltrans building damage threshold for new residential and modern industrial structures is 0.50 PPV (in/sec).

¹ Distance from the project construction boundary to the building structure.

Caltrans = California Department of Transportation

max = maximum

ft = foot/feet

PPV = peak particle velocity

in/sec = inches per second

Long-Term Operational Vibration Impacts. Once operational, the Proposed Project would not generate vibration. Furthermore, vibration levels generated from project-related traffic on the adjacent roadways (i.e., Kaiser Road, Syar Way, and other roadways) would be unusual for on-road vehicles because the rubber tires and suspension systems of on-road vehicles provide vibration isolation. Therefore, vibration levels generated from project-related traffic on the adjacent roadways would be **less than significant** and no mitigation is required.

c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 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?

The Project Site is approximately 2.5 miles north of Napa County Airport. The Napa Countywide Airport Land Use Compatibility Plan (ALUCP),⁹² identifies the Project Site as within the Airport Influence Area and Zone D1 Compatibility Zone as delineated in the Napa Countywide ALUCP. The Zone D1 Compatibility Zone (Inner Traffic Pattern Zone) is characterized by low cumulative aircraft noise (generally below 55 CNEL). The Project Site is outside the 55 dBA CNEL noise contour of Napa County Airport based on the Napa County Airport Master Plan.⁹³ Therefore, the proposed project would not conflict with the Napa Countywide ALUCP and would not expose people working in the project area to excessive noise levels. **No impact** would occur and no mitigation is required.

⁹² Napa County Airport Land Use Commission. 2024. Napa Countywide Airport Land Use Compatibility Plan Containing Individual Plans for Angwin Airport – Parret Field Napa County Airport. Adopted December 4. Website: <https://www.napacounty.gov/DocumentCenter/View/35937/Napa-Countywide-ALUCP---Complete-Version?bidId=> (accessed July 14, 2026).

⁹³ County of Napa. 2007. Napa County Airport Master Plan. March. Website: <https://www.napacounty.gov/DocumentCenter/View/1985/Napa-County-Airport-Master-Plan-PDF> (accessed May 2026).

4.14 POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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)?	☐	☐	☒	☐
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

4.14.1 Impact Analysis

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

The Project Site is currently undeveloped and does not contain any residential units. The Proposed Project would develop a flexibly designed multi-tenant light industrial building totaling 153,380 square feet. The building would include approximately 23,007 square feet of office space and 130,373 square feet of warehouse space. The United States Census Bureau estimated the City's population at approximately 76,921 residents in July 2024.⁹⁴

Construction of the Proposed Project is not anticipated to induce substantial population growth, as construction workers are expected to come from the City of Napa and the surrounding area. Operation of the Proposed Project as a multi-tenant light industrial building is estimated to provide approximately 253 jobs. However, these jobs would not necessitate substantial population growth, as most of the new jobs are anticipated to be filled by the local and regional workforce. Therefore, the Proposed Project would not necessitate substantial population growth in the vicinity of the Project Site or within the city. The Proposed Project is consistent with its land use designation and zoning district and would not generate growth beyond that anticipated in the City's General Plan.

Further, because the Proposed Project does not include residential uses, it would not result in direct population growth. Therefore, the Proposed Project would not directly or indirectly induce population growth, and this impact would be **less than significant**. No mitigation is required.

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

The Project Site is currently vacant and undeveloped, and no residential uses exist within the Project Site. Therefore, the project would not displace any existing people or housing, nor would the

⁹⁴ United States Census Bureau. 2024. QuickFacts Napa City, California. 2024. Website: <https://www.census.gov/quickfacts/fact/table/napacitycalifornia,US/PST045224> (accessed January 29, 2026).

Proposed Project require the construction of replacement housing. As a result, **no impact** would occur and no mitigation is required.

4.15 PUBLIC SERVICES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐
ii. Police protection?	☐	☐	☒	☐
iii. Schools?	☐	☐	☒	☐
iv. Parks?	☐	☐	☒	☐
v. Other public facilities?	☐	☐	☒	☐

4.15.1 Impact Analysis

a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

i. Fire protection?

Fire protection and emergency medical services are provided to the Project Site and the surrounding area by the NFD. There are five (5) fire stations located throughout the city. The nearest fire station to the Project Site is Fire Station 4, approximately 1.6 miles north at 251 Gasser Drive.⁹⁵

The NFD does not have established response times and aims to meet the National Fire Protection Association's standards of a four (4)-minute response time for first responders 90 percent of the time. As of 2023, NFD's response time for all priority incidents was within 6 minutes and 24 seconds 90 percent of the time.⁹⁶ Although the City does not meet the NFPA's standard response time, the Proposed Project would adhere to General Plan policy SN 5-4, which ensures that future development provides adequate evacuation routes, vegetation management policies, and fire-reduction design measures to minimize fire hazard at the Project Site.

⁹⁵ National Emergency Response Information System (NERIS). 2023. City of Napa Fire Department. Stations. Website: <https://neris.fsri.org/departments/FD06055278/stations> (accessed January 29, 2026).

⁹⁶ City of Napa. 2023. City of Napa Fire Department Organizational and Operational Analysis. January. Website: <https://www.cityofnapa.org/DocumentCenter/View/10761/Napa-Fire-Service-Analysis?bidId=> (accessed January 29, 2025).

Planned growth under the City's General Plan would increase calls for fire protection service throughout the NFD's service area. The Proposed Project could result in a minor increase in demand for fire protection services due to an increase in daytime population (up to 253 employees) on the Project Site. The increase in population would be consistent with the Project Site's existing General Plan designation and therefore does not represent unplanned growth. The Proposed Project would also be required to comply with all applicable fire safety and emergency access codes.

The three (3) eastern driveways along Syar Way would provide adequate turning radii ranging between 20 and 40 feet for the NFD apparatus. Circulation throughout the Project Site would be consistent with applicable requirements regarding fire access in the event of an emergency, including all NFD standards, City of Napa ordinances, and the California Fire Code.

The NFD would continue to provide fire protection services to the project area and would not require additional firefighters to serve the Proposed Project. The minor increase in service demand would not adversely affect response times to the Project Site or within the city. The Proposed Project itself would not require the construction of new or physically altered fire protection facilities, which could result in an environmental impact. Additionally, because the Proposed Project would not induce substantial population growth and would be required to pay development impact fees in accordance with Chapter 15.78 of the City's Municipal Code⁹⁷ to fund future fire facilities and services, which would be subject to project- and site-specific environmental review, impacts associated with the need to expand fire protection services and facilities in order to maintain acceptable levels of service would be **less than significant**. Therefore, construction and operation of the Proposed Project would have a **less-than-significant** impact on fire protection and safety services and facilities. No mitigation is required.

ii. Police protection?

The Napa Police Department (NPD) provides police protection services to the Project Site and the surrounding area. The City has one (1) police station, located at 1539 First Street.⁹⁸ The Napa 911 Dispatch Center receives and processes approximately 115,000 calls per year for the City, as well as for the Napa Sheriff's Department and surrounding communities.⁹⁹ The Proposed Project could result in a minor increase in demand for police protection services due to an increase in daytime population (employees) on the Project Site. The increase in daytime population would be consistent with the Project Site's existing General Plan designation and therefore does not represent unplanned growth. NPD would continue to provide police protection services to the project area without requiring additional officers, and the construction of new or expanded police facilities

⁹⁷ City of Napa. 2025. *City of Napa Municipal Code, Title 15 Buildings and Construction, Chapter 15.78 Fire and Paramedic Development Impact Fee*. Website: <https://ecode360.com/43395872#43395964> (accessed January 29, 2026).

⁹⁸ City of Napa. n.d. Police Department. Website: <https://www.cityofnapa.org/323/Police-Department> (accessed January 29, 2026).

⁹⁹ City of Napa. n.d. *Support Services. Napa 911 Dispatch Center*. Website: <https://www.cityofnapa.org/477/Support-Services> (accessed January 29, 2025).

would not be required. Therefore, impacts to police protection would be **less than significant**. No mitigation is required.

iii. Schools?

The Napa Valley Unified School District (NVUSD) operates 26 schools, from transitional kindergarten through 12th grade. The Proposed Project does not include any residential uses and would not directly affect student population. As previously discussed in Section 4.14, the Proposed Project could increase the workforce population by up to 253 employees. Workforce population does not directly increase demand for schools, so this growth would only result in a minor increase in student population and may be spread among the whole school district (or outside of the district in neighboring communities), depending on each employee's place of residence.

State Education Code Section 17620 authorizes the governing board of a school district to levy school fees to offset the impacts to school facilities from new residential and commercial/industrial construction and reconstruction.¹⁰⁰ The NVUSD requires payment of a school impact fee, calculated per square foot of industrial development, at the current rate in effect at the time an owner/developer seeks permit issuance. Once fees are paid directly to NVUSD, the Project Applicant would present the Certificate of Compliance issued by the NVUSD to the City of Napa's Community Resources and Development Department.¹⁰¹ The project sponsor would be required to pay this fee prior to issuance of a building permit. The NVUSD school impact fee is calculated to offset any impact to schools that could result from the Proposed Project. Therefore, the Proposed Project would have a **less-than-significant** impact to schools. No mitigation is required.

iv. Parks?

The City's parks system currently consists of more than 54 parks and 32 miles of trails that cover approximately 955.5 acres of parkland.¹⁰² The closest park to the Project Site is the Napa River Trail and Kennedy Park, located approximately 0.3 miles northwest of the Project Site. The City's General Plan establishes a park standard of 10.0 acres of parkland for every 1,000 residents. As of 2024, the City had an estimated population of 76,921 residents.¹⁰³ Pursuant to the City's park standard, the city would require 769.21 acres of parkland.¹⁰⁴ As such, under current conditions, the city has a surplus of 186.29 acres of parkland.

¹⁰⁰ Napa Valley Unified School District (NVUSD). 2024. Developer Fee Justification Study Napa Valley Unified School District. April 25. Website: https://resources.finalsite.net/images/v1778880561/nvusdk12caus/r5ic5eegsmc1cqlytgvs/24-04-15DevFee66266_DFFinal.pdf.

¹⁰¹ Napa Valley Unified School District (NVUSD). n.d. Developer Fees. Website: <https://www.nvUSD.org/doing-business-with-us/developerfees-clone> (accessed January 29, 2026).

¹⁰² City of Napa. 2023. Park Infrastructure Program Report. May Website: <https://www.cityofnapa.org/DocumentCenter/View/12033/Park-Infrastructure-Program-2023> (accessed January 29, 2026).

¹⁰³ United States Census Bureau. 2024. QuickFacts Napa City, California. Website: <https://www.census.gov/quickfacts/fact/table/napacitycalifornia,US/PST045224> (accessed January 29, 2026).

¹⁰⁴ $76,921 / 1,000 = 76.921 * 10 = 769.21$.

As previously discussed in Section 4.14, the Proposed Project could increase the workforce population by up to 253 employees. Therefore, the minor population increase that could result from the Proposed Project could also increase the use of these parks in the project vicinity, as well as other parks within the city and region. The Proposed Project would not provide any new residential uses, and the minor increase in park use associated with the project would not adversely affect the physical conditions of local and regional open space areas or recreational facilities, nor would it require the provision of new parks or facilities to meet established service goals. Therefore, impacts on parks would be **less than significant**. No mitigation is required.

v. Other public facilities?

As previously discussed above and in Section 4.14, Population and Housing, the Proposed Project could increase the workforce population by up to 253 employees and may be spread across the City of Napa or other surrounding communities. Development of the Proposed Project could increase demand for other public services, including libraries, community centers, and public healthcare facilities. However, the increased demand would be minor and would not substantially increase the usage of these facilities. Therefore, no new or expanded facilities would be required to maintain service standards. As with all development projects in Napa, the project would be required to pay Development Impact Fees, which are intended to fund and sustain improvements needed as a result of new development. Impacts on other public facilities would be **less than significant**. No mitigation is required.

4.16 RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐

4.16.1 Impact Analysis

- a. *Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?*

As discussed in Section 4.15, Public Services, the City of Napa had an estimated population of 76,921 residents. Pursuant to the City's park standard of 10 acres per 1,000 residents, the City would require approximately 769.21 acres of parkland. Under current conditions, the City has a surplus of 186.29 acres of parkland.

The Proposed Project could result in an on-site population increase of up to 253 employees. Although it is likely that the Proposed Project would employ individuals from the local workforce in the city and county, this could result in a negligible population increase, increasing the total population to approximately 77,174 residents. Based on this total, the City would require 771.74 acres of parkland, leaving a surplus of 183.76 acres. This represents a minor increase in the use of recreational facilities and would not contribute to substantial deterioration of existing recreational facilities. Therefore, impacts on existing neighborhood and regional parks or other recreational facilities would be **less than significant**. No mitigation is required.

- 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?*

As discussed in Section 4.16.1.a, the Proposed Project would result in a minor usage increase of recreational facilities and does not include or require construction or expansion of existing public recreational facilities. Therefore, impacts related to the construction or expansion of recreational facilities would be **less than significant**. No mitigation is required.

4.17 TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b. Conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?	☐	☐	☒	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d. Result in inadequate emergency access?	☐	☐	☒	☐

The information and analysis in this section are based, in part, on the findings from the Vehicle Miles Traveled Analysis Memorandum (VMT Memo)¹⁰⁵ (**Appendix G**) prepared for the Proposed Project by LSA, dated March 4, 2026.

4.17.1 Impact Analysis

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

The Proposed Project would develop a 153,380-square-foot flexible multitenant, light-industrial building consisting of 23,007 square feet of office space and 130,750 square feet of warehouse/light industrial space within a 10.21-acre Project Site. Access to the Project Site would be provided via four (4) driveways, one (1) along Kaiser Road and three (3) along Syar Way, designed to efficiently accommodate both truck and passenger vehicle traffic. Truck traffic would enter the Project Site from Kaiser Road, providing access to 24 elevated loading docks for shipping and receiving. Trucks would then exit via the northernmost driveway along Syar Way, providing truck access while minimizing interference with passenger vehicle traffic. Internal circulation would be supported by drive aisles of various sizes to provide adequate space for both truck and passenger vehicle traffic. Passenger vehicle traffic would enter and exit from the southern driveway along Kaiser Road, and the two (2) southeastern driveways along Syar Way. Passenger vehicles would be restricted to only right-turn exits onto Kaiser Road.

Roadway Analysis. *The City of Napa Traffic Advisory Committee Policy Guidelines: Traffic Impact Analysis for Private Development Review*¹⁰⁶ was adopted by the Traffic Advisory Committee to provide the standard requirements for the preparation of a traffic study. These guidelines state that

¹⁰⁵ LSA. 2026. *Napa Valley Vintners Park Light Industrial Project Vehicle Miles Traveled Analysis Memorandum* (LSA Project #20252510). March 5.

¹⁰⁶ City of Napa. 2002. *Traffic Advisory Committee Policy Guidelines: Traffic Impact Analysis for Private Development Review*. December 12. Revised May 12, 2005. Website: <https://www.cityofnapa.org/DocumentCenter/View/980/Traffic-Impact-Analysis-PDF> (accessed May 28, 2026).

projects that have less than the number of threshold units (196,000 square feet for the Institute of Transportation Engineers (ITE) Code 150 Warehousing) reflect 100 peak-hour vehicle trips for non-residential uses and would not require a full Traffic Impact Study.

The trip generation for the Proposed Project was estimated using rates from the ITE *Trip Generation Manual*, 12th Edition. **Table 4.17.A**, below provides the Proposed Project's trip generation.

Table 4.17.A: Trip Generation

Land Use (ITE Land Use Code)	Size	Unit	Daily		AM Peak Hour		PM Peak Hour	
			Rate	Trips	Rate	Trips	Rate	Trips
Trip Rates								
High-Cube Fulfillment Center Warehouse (155) ¹	130.373	ksf	1.77	231	0.12	16	0.14	18
General Office (710)	23.007	ksf	7.83	180	1.24	29	1.18	27
Net Trip Generation			-	411	-	44	-	45

¹ Trip rates based on the ITE *Trip Generation Manual*, 12th Edition.

ADT = average daily traffic

ITE = Institute of Transportation Engineers

ksf = thousand square feet

As Table 4.17.A indicates, the Proposed Project is anticipated to generate 411 daily trips of which 44 would occur in the AM peak hour and 45 would occur in the PM peak hour. As such, the project's trip generation is below the thresholds established by the City's guidelines (100 vehicle-trips for non-residential uses) and the preparation of a traffic analysis is not required for the Proposed Project. Therefore, the Proposed Project would have a **less than significant impact** on nearby roadways.

Transit, Pedestrian, and Bicycle Facilities. The potential impacts of the Proposed Project on pedestrian, bicycle and transit are described below. **Pedestrian Facilities.** The Proposed Project has the potential to generate pedestrian trips to/from the Project Site and transit stops in the area. The volume of pedestrian trips generated by the Proposed Project is not anticipated to exceed the carrying capacity of the sidewalks and crosswalks nearby. In the immediate project vicinity, there are sidewalks along Kaiser Road and Syar Way up to the intersection with Kaiser Road.

Consistent with existing City policies, the Proposed Project would provide minimum 4.5-foot-wide pedestrian pathways connecting to from public sidewalk which would lead to the building entrances and primary parking area. The Proposed Project would not disrupt existing pedestrian facilities and would not interfere with planned pedestrian facilities. Therefore, the Proposed Project would have a **less than significant impact** on pedestrian facilities.

Bicycle Facilities. United States Census Bureau data indicate that bicycle trips comprise approximately 2.2 percent of the total commute mode share in the City of Napa.¹⁰⁷ The low volume of bicycle trips generated by the Proposed Project would not exceed the bicycle-carrying capacity of streets surrounding the site, and the increase in bicycle trips would not by itself require new off-site bicycle facilities. The nearest designated bikeway to the project area consists of a Class II Bikeway along Kaiser Road and Napa Valley Corporate Drive, approximately 0.2 miles east of the Project Site. The Proposed Project on its own would not require additional bicycle service to the area. Furthermore, the Proposed Project would not preclude, modify, or otherwise affect existing or proposed bicycle projects or policies identified in the General Plan Transportation Element. Therefore, impacts to bicycle facilities would be **less than significant**.

Transit Service. The project area is served by the Napa Valley Transportation Authority (NVRTA) Vine Bus System Route 11, with the nearest transit stop located approximately 0.3 miles to the east of the Project Site, and accessed via existing sidewalks along Kaiser Road. The low volume of transit trips generated by the Proposed Project would not exceed the carrying capacity of the existing transit service to the site and the Proposed Project would not interfere with existing transit facilities, preclude the construction of any planned transit facilities, or otherwise affect existing or proposed transit projects or policies identified in the City of Napa General Plan. Therefore, the Proposed Project would have a **less than significant impact** on transit service.

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

On December 28, 2018, the California Office of Administrative Law authorized the revised CEQA guidelines for use. Among the changes to the guidelines were the removal of vehicle delay and level of service measurements from consideration under CEQA. With the adopted guidelines, CEQA transportation impacts are to be evaluated based on project-generated VMT.

The Napa City Council adopted the City's Senate Bill (SB) 743 guidelines (City Guidelines) on May 4, 2021. The City Guidelines established VMT significance thresholds for residential, office, and retail land uses. Although these guidelines do not provide any VMT screening criteria for land use projects, based on LSA's understanding, the City allows the use of VMT screening approaches consistent with the State's technical guidance. The State's technical guidance for conducting VMT analysis is the *Technical Advisory on Evaluating Transportation Impacts in CEQA* (Technical Advisory), prepared in December 2018 by the California Governor's Office of Research and Planning (now known as the Governor's Office of Land Use and Climate Innovation).

The City's adopted VMT significance thresholds are:

- Residential projects: Significant if VMT per capita exceeds 15 percent below the regional average

¹⁰⁷ United States Census Bureau. 2021 Census. 5-year ACS Data Table B08134: Means of Transportation to Work by Travel Time to Work. Website: https://data.census.gov/table?q=B08134:MEANS+OF++TRANSPORTATION+TO+WORK+BY+TRAVEL+TIME+TO+WORK&g=160000+0US0681554_1600000US068166&tid=ACSDT5Y2021.B08134 (accessed March 25, 2026).

- Office projects: Significant if VMT per employee exceeds 15 percent below the regional average
- Retail projects: Significant if the project causes a net increase in total VMT

The City determines VMT metrics and thresholds for other project types, such as the proposed industrial project, on a case-by-case basis. City staff indicated that the Proposed Project may be evaluated using a VMT per employee approach if adequate justification is provided to show why the method is appropriate and how industrial travel patterns relate to office-based VMT assumptions.

Because the City Guidelines do not specify VMT screening criteria for land use projects, screening approaches in the Technical Advisory were reviewed for applicability to the Proposed Project. The following is a brief description of the applicability of each of these VMT screening criteria for the Proposed Project:

- **Small Project:** The Technical Advisory identifies that projects generating less than 110 daily trips could be screened out of a detailed VMT analysis. The Proposed Project is estimated to generate more than 110 daily trips and as such this screening criteria does not apply to the Proposed Project.
- **Map-Based Screening for Residential and Office Projects:** Residential and office projects that are in low VMT areas, and those projects that incorporate similar features (i.e., density, mix of uses, transit accessibility) tend to exhibit similarly low VMT, are eligible to be screened out from further VMT analysis.

The City provided traffic analysis zone (TAZ)-based screening maps¹⁰⁸ showing:

- VMT per capita
- VMT per employee

The Project Site is in a TAZ where VMT per employee is below 85 percent of the Napa County average, which meets the definition of a low VMT area. Typically, the VMT per capita map can be used for residential projects and the VMT per employee map can be used for non-residential and non-retail projects. Based on the VMT per employee map, the Proposed Project can be screened out of a VMT analysis. However, the City Guidelines explicitly reference the use of VMT per employee for office uses. As such, the City requested supporting justification for applying the VMT per employee metric to industrial uses, as provided in **Appendix G**.

As mentioned above, the Proposed Project can be screened out of VMT analysis using map-based screening criteria and VMT per employee if sufficient justification supports its applicability.

As previously indicated, the City Guidelines recommend the use of “VMT per capita” for residential uses, “VMT per employee” for office uses, and “net change in VMT” for retail/commercial uses. The

¹⁰⁸ City of Napa. n.d. Solano-Napa Activity-Based Model Traffic Analysis Zone Maps. Website: <https://www.arcgis.com/home/webmap/viewer.html?webmap=9ed4e08db71243dca34bba256e382997&extent=-122.4476,38.3367,-122.2439,38.44> (accessed February 2026).

City Guidelines do not recommend any specific VMT metric for industrial land uses. However, applying VMT per employee to industrial land uses is appropriate for the following reasons:

- **Travel Behavior:** Industrial uses function similarly to office uses in terms of travel patterns. Industrial uses are non-residential and generally do not generate substantial customer trips. Instead, employee commute travel typically accounts for the majority of project VMT. This travel pattern more closely resembles office uses than retail uses, which generate significant customer-based VMT.
- **Employment-Based Scaling:** Industrial projects are fundamentally employment-generating land uses, and project intensity is typically defined by number of employees rather than customers or visitors. Accordingly, a VMT per employee metric provides a proportional and scalable measure of transportation impact.
- **Industry Practice:** Application of employment-based VMT metrics to industrial uses is also consistent with practices adopted by multiple California jurisdictions where local guidance does not specify a separate metric for industrial development.
- **Limitations of Net VMT for Industrial Uses:** Industrial uses do not generate substantial customer trips or pass-by travel; therefore, evaluating such projects using a net-change VMT approach—commonly applied to retail uses—would not meaningfully capture their transportation characteristics. Because industrial VMT is driven primarily by employee commute patterns, an employment-based metric provides a more appropriate and proportional method for evaluating project impacts.

Retail development is typically evaluated using a net change in VMT approach because such uses often redistribute existing consumer travel within a regional market rather than generating entirely new travel demand. Retail trips frequently include pass-by, linked, and diverted trips, meaning that a portion of project traffic would occur even in the absence of the Proposed Project, but at different locations. For this reason, net change in VMT more accurately reflects the incremental transportation effect of retail development and is widely applied in SB 743 implementation.

Industrial uses, however, do not generally function as interchangeable customer destinations within a retail market. Instead, industrial VMT is primarily driven by employee commute trips and site-specific logistics that are strongly influenced by project location. These trips are less likely to be redistributed from other industrial sites and therefore represent a more direct reflection of project characteristics. Consequently, a retail-oriented net VMT framework would not appropriately capture the transportation effects of industrial development.

As previously noted, the VMT per employee map indicates that the Proposed Project is in a low VMT area. Based on discussion with City staff, it is appropriate to apply the VMT screening map if it can be demonstrated that industrial VMT is similar to or lower than office VMT. Therefore, describing why industrial uses generate fewer trips and have shorter average commute distances would confirm that industrial VMT is lower compared to office uses. The justification provided in **Appendix G** demonstrates that industrial projects like the Proposed Project, would have less VMT per employee compared to office projects. Therefore, based on the Proposed Project's location in a

low VMT area and the appropriateness of the VMT per employee metric for industrial uses, the Proposed Project can be screened out of a detailed VMT analysis, and as such would not conflict or be inconsistent with *State CEQA Guidelines* Section 15064.3, subdivision (b). The Proposed Project would therefore have a **less than significant impact** on the VMT. No mitigation is required.

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

The Proposed Project's design does not include any geometric design features or incompatible uses that could substantially increase circulation hazards or traffic hazards. The Proposed Project would include the development of a flexibly designed multi-tenant light industrial building totaling 153,380 square feet. The building would include approximately 23,007 square feet of office space and 130,373 square feet of warehouse space. Vehicular access to the Project Site would be provided via four (4) driveways, one (1) driveway along Kaiser Road, and three (3) driveways along Syar Way to accommodate truck and passenger vehicle traffic. Passenger vehicle traffic would enter and exit from the southern driveway along Kaiser Road and the two (2) southeastern driveways along Syar Way, while truck traffic would be limited to entering the Site from the southern driveway along Kaiser Road. Passenger vehicles would be restricted to only right-turn exits onto Kaiser Road from the southernmost driveway. Truck traffic exiting the site would be limited to exiting through the northernmost driveway along Syar Way, to minimize interference with passenger vehicle traffic. As shown previously in **Figure 2-2** in Chapter 2.0, Project Description, the Project Site is generally surrounded by residential, industrial, and commercial office uses. Therefore, the Proposed Project would not substantially increase hazards due to a geometric design feature or incompatible uses, and impacts would be **less than significant**. No mitigation is required.

d. Would the project result in inadequate emergency access?

Vehicular access to the Project Site would be provided via four (4) driveways, one (1) driveway along Kaiser Road, and three (3) driveways along Syar Way to accommodate truck and passenger vehicle traffic. Passenger vehicle traffic would enter and exit from the southern driveway along Kaiser Road, and the two (2) southeastern driveways along Syar Way. Passenger vehicles would be restricted to only right-turn exits onto Kaiser Road. Truck traffic would then exit through the northernmost driveway along Syar Way, providing access while minimizing interference with passenger vehicle traffic. Circulation throughout the Project Site would be consistent with applicable requirements regarding fire access in the event of an emergency, including all Napa Fire Department (NFD) standards, City of Napa Standard Specifications, , and the California Fire Code.

The Proposed Project would not reduce the number of traffic lanes on Kaiser Road or alter the existing street layout; therefore, it would not alter or obstruct emergency evacuation routes. In addition, the Proposed Project would be consistent with the policies outlined in the City's General Plan Safety Element, including Policy SN 5-4, in which the City would ensure that future development plans provide adequate evacuation routes, vegetation management policies, and fire-reduction measures, as appropriate. Therefore, the Proposed Project would not result in inadequate emergency access. Impacts would be **less than significant**, and no mitigation is required.

4.18 TRIBAL CULTURAL RESOURCES

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

4.18.1 Impact Analysis

- a. *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:*
- i. *Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)? Or*
 - ii. *A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.*

Chapter 532, Statutes of 2014 (i.e., Assembly Bill [AB] 52), requires Lead Agencies to evaluate a project's potential to impact "tribal cultural resources." Such resources include "[s]ites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resources." AB 52 also gives Lead Agencies the discretion to determine, supported by substantial evidence, whether a resource qualifies as a "tribal cultural resource."

AB 52 (specifically Public Resources Code [PRC] 21080.3.1) establishes a formal consultation process with California Native American tribes regarding tribal cultural resources, commonly called AB 52 consultation. The AB 52 consultation process must be completed before a CEQA document can be certified. Under PRC Section 21080.3.1, lead agencies are required to “begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the Proposed Project.” Native American tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the lead agency.

As previously described in Section 1.0, Project Information, a request form describing the Proposed Project and a map depicting the Project Site were sent to the NAHC requesting a list of tribes eligible to consult with the City, pursuant to Public Resources Code Section 21080.3.1. On August 8, 2025, and August 11, 2025, the NAHC responded to the City’s request with a consultation list and a letter indicating that the search of the Sacred Lands Files (SLF) for the Project Site was positive.

On November 20, 2025, the City sent a formal notice for AB 52 consultation to the 14 tribal representatives from California Native American tribes that are traditionally and culturally affiliated with the geographic area of the Project Site, as identified by the NAHC. The letters were sent via email and certified mail.

The City received two (2) responses to the consultation requests, including the following:

- On November 24, 2025, representatives from the Mishewal-Wappo Tribe of Alexander Valley requested consultation. On December 22, 2025, the City responded, providing Project materials and asking the tribe’s availability for a consultation meeting. The City received no response, and provided a follow-up e-mail on January 29, 2026, to provide a final opportunity for consultation. The City received no response and concluded consultation.
- On January 2, 2025, representatives from the Yocha Dehe Wintun Nation requested consultation and requested additional information regarding project timeline, detailed project information, and the latest cultural study for the Proposed Project. On January 5, 2026, the City responded, providing Project information and asking for the tribe’s availability to schedule a consultation meeting. On January 5, 2026, the representatives from the Yocha Dehe Wintun Nation provided their availability to schedule a consultation meeting. On January 19, 2026, the City and the Tribe engaged in a formal consultation meeting to discuss the contents of the existing soil stockpiles on the Project Site, the locations of proposed ground disturbance, and proposed tribal cultural mitigation measures. On February 26, 2026, the City and the tribe conducted a site visit to evaluate the existing conditions of the soil stockpiles. On March 13, 2026, the City provided the tribe project updates regarding the cultural resources analysis. On April 13, 2026, the Tribe responded, concurring with the findings of the cultural resources analysis. The City received no additional response and concluded consultation.

The City received no other requests for consultation during the 30-day AB 52 notification period. Therefore, the City considers the AB 52 consultation process to be concluded.

As described in Section 4.5, Cultural Resources, impacts related to accidental discovery of cultural resources or human remains were determined to be less than significant with implementation of

Mitigation Measures CUL-1 and CUL-3, which would ensure that any previously unknown archaeological resources or human remains encountered during construction are properly identified, evaluated, and protected.

Project ground-disturbing activities would include excavation and grading requiring ground disturbance to a depth of up to six (6) feet below the ground surface to accommodate the proposed bioretention areas. Although no known tribal cultural resources are known to be present at the Project Site, the possibility of accidental discovery of such resources cannot be discounted. In the event that cultural items or human remains determined to be of Native American origin are encountered during project ground disturbing activities, **Mitigation Measure TCR-1** shall be implemented.

Mitigation Measure TCR-1

Unknown Tribal Cultural Resources. In the event that unknown tribal cultural resources are discovered during ground-disturbing activities, work shall cease within 50 feet of the find until a qualified archaeologist has evaluated the find in accordance with federal, State, and local guidelines to determine whether the find constitutes a cultural resource of potential Native American origin.

The contractor shall immediately notify the City, which shall then contact the Native American Heritage Commission (NAHC) and a qualified archaeologist (meeting the Secretary of the Interior's Professional Qualifications Standards). In coordination with NAHC and the archaeologist, the City shall determine the appropriate Tribe(s) with cultural affiliation to the project area at the time of the find. If the City and consulting Tribe(s) determine that the discovery is a Tribal Cultural Resource, the project sponsor shall retain a Tribal representative, at the project sponsor's expense, to work with the qualified archaeologist to prepare a Discovery Treatment Plan. The Discovery Treatment Plan shall be developed in consultation with the consulting Tribe(s) and shall identify avoidance as the preferred mitigation strategy. If the Discovery Treatment Plan requires monitoring, avoidance, recovery, or other on-site treatment, the project sponsor shall fund a qualified Tribal monitor and any Tribal experts requested by the consulting Tribe(s). The Discovery Treatment Plan shall specify the monitor's duties, working hours, and protocols, including the monitor's stoppage authority if sensitive material is encountered.

- If avoidance is not feasible, the Discovery Treatment Plan shall include culturally appropriate treatment measures, which may include, but are not limited to:
 - Establishing construction monitoring activities for the duration of ground-disturbing activities;

- Establishing protective buffers (consistent with the 50-foot halt distance) and any additional buffers recommended by the consulting Tribe(s) and qualified archaeologist;
- Stabilization or in-situ preservation;
- Culturally appropriate documentation or heritage recovery;
- Confidentiality protection of Tribal Cultural Resource locations (sensitive location information shall be restricted to the City, the consulting Tribe(s), and qualified professionals with a demonstrated need to know);
- Access for Tribal practitioners and/or traditional use; and
- Prohibition on photography, public dissemination, or testing of Native American human remains or associated funerary objects unless expressly authorized by the consulting Tribe(s) and consistent with applicable law.

Work may resume in the halted area only after the City, in coordination with the consulting Tribe(s) and the qualified archaeologist, has reviewed and approved the Discovery Treatment Plan. The City shall complete its review within seven (7) calendar days of receipt of the Discovery Treatment Plan, unless the City documents good cause for additional time and provides written notice to the consulting Tribe(s) and project sponsor. If the consulting Tribe(s) request additional measures, the City shall incorporate them unless the City documents why a requested measure is infeasible under applicable law.

Additional procedural clarifications:

If human remains are discovered and are determined to be Native American, all handling and disposition shall follow CCR Section 15064.5, PRC Section 5097.98, Health and Safety Code Section 7050.5, and the protocols set forth in the Discovery Treatment Plan developed in consultation with the consulting Tribe(s) and, where applicable, the Most Likely Descendant (MLD). If reburial is part of the agreed treatment, reburial shall be conducted with appropriate dignity in a location agreed upon by the consulting Tribe(s) and the City, and the location of such reburial shall be kept confidential and protected from further disturbance to the extent permitted by law.

The project sponsor shall maintain a record of all notifications, consultations, monitoring reports, Discovery Treatment Plans, and

treatment actions and shall provide copies to the City and the consulting Tribe(s) upon request. A final monitoring/treatment report shall be prepared by the qualified archaeologist and Tribal monitor and submitted to the City and NAHC within 30 days of completion of mitigation activities.

Mitigation Measure TCR-1, outlines provisions for stop-work procedures and handling of finds, if previously unknown Tribal Cultural Resources are encountered during ground-disturbing activities. If avoidance is not feasible, a Discovery Treatment Plan would outline culturally appropriate treatment (such as monitoring, buffers, preservation, heritage recovery, confidentiality protections, and Tribal access), and work would resume only after the City, in consultation with the Tribe(s) and a qualified archaeologist, approves the Discovery Treatment Plan in accordance with all applicable laws.

In addition to **Mitigation Measure TCR-1**, the Proposed Project would also be required to implement **Mitigation Measures CUL-2 through CUL-4**. **Mitigation Measures CUL-2 and CUL-3** require an Archaeological ALERT Sheet to be provided to all construction personnel and require that the project sponsor and contractor conduct mandatory Worker Environmental Awareness Program (WEAP) training, including tribal participation where appropriate, to ensure proper field recognition and reporting procedures. In addition, **Mitigation Measure CUL-4** requires that if human remains are inadvertently uncovered during construction, all work within 50 feet of the discovery must halt and the County Coroner must be notified immediately, consistent with CEQA and State law. If the remains are identified as Native American, the Coroner must contact the NAHC, which will designate an MLD to determine appropriate treatment and disposition. The City must ensure that grading plans include the requirements of **Mitigation Measures TCR-1 and CUL-2 through CUL-4** prior to issuance of a grading permit.

Therefore, in the event that tribal cultural resources are uncovered during project activities, all potential impacts to tribal cultural resources would be reduced to less-than-significant levels through the implementation of **Mitigation Measures TCR-1 and CUL-2 through CUL-4**.

4.19 UTILITIES AND SERVICE SYSTEMS

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

4.19.1 Impact Analysis

- a. *Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*

The Proposed Project would construct a flexibly designed multi-tenant light industrial building and associated circulation, parking, infrastructure, and landscaping improvements on the undeveloped Project Site, thereby increasing demand on utilities from existing conditions. The Proposed Project's demand on utilities, including water, wastewater, storm drainage, electrical power, and natural gas, is discussed below.

Water. The City's Water Division provides water service to the City, including the Project Site. The City supplies potable water through approximately 360 miles of transmission mains and distribution piping to almost 25,500 service connections within the City Limits, as well as some customers outside City Limits. Potable water service for the Proposed Project would be provided through a connection to an existing eight (8)-inch water line located in the Syar Way right-of-way. The Proposed Project would install a new on-site domestic water line that connects to the existing eight (8)-inch water line, distributing water to the proposed office and warehouse areas. As discussed under Section 4.19.1.b below, the Proposed Project would not substantially increase water demand and would therefore not exceed the capacity of existing water treatment facilities. As such, implementation of the Proposed Project would not require or result in the relocation or construction of new or expanded water supply infrastructure. The Proposed Project would not

require any new infrastructure, aside from project-specific tie-ins and water pipelines serving the Proposed Project, and all proposed water infrastructure would be limited to the Project Site. Therefore, the impact of the Proposed Project on water infrastructure would be **less than significant**.

Wastewater. The Napa Sanitation District (NapaSan) provides wastewater collection and treatment services in the City and maintains existing sanitary sewer lines within the vicinity of the Project Site. Wastewater generated by the proposed warehouse and office building would be conveyed to the existing sanitary sewer system in the surrounding area through the installation of a new on-site sewer lateral that would connect to an existing sewer main located in the Syar Way right-of-way. The on-site system would consist of gravity-flow sewer lines that would collect wastewater from restrooms, sinks, and other plumbing fixtures within the proposed building. Wastewater infrastructure would be constructed in compliance with the City's Public Works Department and NapaSan's standards.

NapaSan's wastewater treatment plant currently treats approximately 8 million gallons per day (mgd) and has a capacity of up to 15.4 mgd.¹⁰⁹ The Proposed Project would result in typical wastewater discharges that would not require new treatment methods or equipment not currently permitted at the NapaSan Wastewater Treatment Facility, which would serve the Proposed Project. Based on the CalEEMod results, the Proposed Project is estimated to generate approximately 30,814,088.4 gallons of wastewater per year (approximately 84,422.16 gallons per day).¹¹⁰ Based on this estimate, the Proposed Project would contribute less than 0.55 percent¹¹¹ of the current wastewater treatment rate of the NapaSan Wastewater Treatment Facility. As such, the NapaSan Wastewater Treatment Facility would have adequate capacity to accommodate wastewater from the Proposed Project, and the existing sewer system would also have adequate capacity for the project. Therefore, impacts associated with the project's construction would be **less than significant**.

Stormwater. The Project Site is currently undeveloped and generally flat, with elevations ranging from approximately 12 to 23 feet. The Project Site's topography slopes slightly downward from north to south. Under existing conditions, stormwater at the Project Site either infiltrates or flows southwest to discharge into the existing 96-inch storm drain within Kaiser Road managed by the City of Napa Drainage Program.

The Proposed Project would increase the impervious surface coverage on the Project Site compared to existing conditions. However, the Proposed Project would generally maintain the existing drainage pattern at the Project Site, infiltrating stormwater at the Project Site and reducing the peak runoff from the Project Site prior to discharging into the existing 96-inch storm drain within Kaiser Road. The Proposed Project would include four (4) bioretention basins located along the perimeter

¹⁰⁹ Napa Sanitation District. n.d. About Us. NapaSan by the Numbers. Website: <https://www.napasand.com/27/About-Us> (accessed January 29, 2026).

¹¹⁰ In the absence of an official wastewater generation rate, wastewater can be reasonably assumed to be 90 percent of water use. $34,237,876 \text{ of gallons per year} \times 0.9 = 30,814,088.4 \text{ gallons per year} / 365 \text{ days per year} = 84,422.16 \text{ gallons per day}$.

¹¹¹ $84,422.16 \text{ gallons per day} / 15.4 \text{ million gallons per day (mgd)} = 0.00548$

of the Project Site. These basins are approximately 20,973 square feet of bioretention space that would be used for stormwater control and treatment to reduce pollutants of concern in stormwater prior to release into the City's drainage system and the receiving waters (i.e., Napa River, San Pablo Bay, and San Francisco Bay). Treated stormwater would be collected and routed to existing storm drain lines within both Kaiser Road and Syar Way, which ultimately convey flows to the City's regional drainage system. As discussed in Section 4.10, Hydrology and Water Quality, the implementation of the proposed bioretention basins would comply with all applicable regulatory compliance measures and would not result in significant environmental effects from the construction of new or expanded storm drainage facilities. Therefore, impacts associated with the construction of the proposed stormwater infrastructure would be **less than significant**.

Electricity and Natural Gas. Electrical service would be provided by PG&E. Electrical service would be routed through new underground infrastructure extending from existing PG&E facilities in the adjacent public rights-of-way. The main electrical service point would be located south of the proposed building, adjacent to Kaiser Road, while conduits and vaults would distribute power internally to tenant spaces, dock equipment, lighting, EV charging, and other electrical infrastructure. Section 4.6, Energy, discusses the Proposed Project's energy requirements (i.e., electricity, fuel consumption, and natural gas consumption). As discussed in Section 4.6, the Proposed Project would consume nominal amounts of electricity compared to what is currently being generated and consumed within the City and the region. PG&E would have adequate electricity to serve the Proposed Project once it is developed and operational. The Proposed Project would not include any natural gas connections. As such, implementation of the Proposed Project would not require or result in the relocation or construction of new or expanded electricity or natural gas supply infrastructure, and impacts would be less than significant.

Overall, because the Proposed Project would connect to existing utility services within or adjacent to the Project Site, the Proposed Project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects, and this impact would be **less than significant**. No mitigation is required.

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

As discussed above, water services to the Project Site are provided by the City's Water Division, which prepared the 2025 Urban Water Management Plan (UWMP).¹¹² According to the City's 2025 UWMP, the City's water use in 2020 (potable water) totaled 14,092 acre-feet (af), with commercial uses accounting for approximately 20 percent (2,792 af) of the City's potable water usage. The actual water use in 2025 (potable water) totaled 12,211 af, with commercial and industrial uses accounting for approximately 22 percent (2,657 af) of the City's potable water usage. The average water use for the City is projected to be 13,560 af in 2030, 14,110 af in 2040 and 14,810 af in 2050.

¹¹² City of Napa. 2026f. *2025 Urban Water Management Plan*. June. Website: <https://www.cityofnapa.org/609/Urban-Water-Management-Plan> (accessed July 13, 2026).

In addition, the 2025 UWMP indicates that the City has sufficient supplies to meet projected water demands in normal, single dry and multiple dry years.

Based on the CalEEMod results, the Proposed Project's estimated water usage would be 35,264,156 gallons per year or 109 afy.¹¹³ Based on this estimate, the Proposed Project would account for less than 0.80 percent, 0.77 percent, and 0.74 percent of the total water usage for the City in 2030, 2040, and 2050, respectively. This represents a negligible percentage of the City's projected service-wide annual water demand for 2030, 2040, and 2050. Furthermore, the City's projected water demand accounts for projected growth within the region as identified by the City's General Plan. As the Proposed Project is consistent with the General Plan designation for the Project Site, the Proposed Project's water demand has been accounted for in the City's water supply and demand estimates. Therefore, the City would not require new or expanded water entitlements to serve the Proposed Project, and impacts would be **less than significant**. No mitigation is required.

c. Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Please refer to the discussion under Section 4.19.1.a, above. Based on modeled wastewater flows, the Proposed Project would contribute less than one (1) percent of the current wastewater treatment rates of the NapaSan Wastewater Treatment Facility. The NapaSan Wastewater Treatment Facility would have adequate capacity to serve the Proposed Project's demand in addition to the provider's existing commitments, and impacts would be **less than significant**. No mitigation is required.

d. Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Solid waste in the city is collected by the City of Napa Solid Waste and Recycling Division, and primarily disposed of at the Potrero Hills Landfill, located at 3675 Potrero Hills Lane in Suisun City, Solano County. The Potrero Hills Landfill accepts a maximum of 4,330 tons of solid waste per day and, as of January 1, 2006, had a remaining capacity of 13,872,000 cubic yards. The maximum permitted capacity is 83,100,000 cubic yards and is anticipated to reach full capacity by 2048. This landfill currently accepts the following types of solid waste: construction/demolition waste, tires, mixed municipal, industrial, ash, agricultural, and sludge (biosolids).

The Project Site is currently undeveloped and generates no solid waste under existing conditions. The construction and operation of the proposed flexibly designed multi-tenant light industrial building would increase the amount of solid waste generated at the Project Site from existing conditions. Based on the CalEEMod results for the Proposed Project, the Proposed Project is anticipated to generate an estimated 144 tons of solid waste per year (0.40 tons per day). This estimate accounts for less than 0.009 percent of the maximum solid waste accepted per day by the Potrero Hills Landfill. This increase in solid waste would be negligible compared to the maximum

¹¹³ 1 U.S. gal/yr = .0000031 afy

allowable capacity per day for these landfills. As such, the project would be served by a landfill with sufficient capacity to accommodate the project's waste disposal needs, and impacts associated with the disposition of solid waste would be **less than significant**. No mitigation is required.

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

All land uses within the city that generate waste are required to coordinate with the Napa Recycling and Waste Services waste hauler to collect solid waste on a common schedule as established in applicable local, regional, and State programs. Additionally, all development within the city, including the Proposed Project, is required to comply with applicable elements of AB 1327, Chapter 18 (California Solid Waste Reuse and Recycling Access Act of 1991), AB 939 (California Department of Resources Recycling and Recovery [CalRecycle]), and other local, State, and federal solid waste disposal standards.

The Proposed Project would be required to comply with applicable provisions of AB 1327, AB 939, and AB 341 related to solid waste as a matter of policy. In addition, as noted above, the Potrero Hills Landfill has adequate capacity to serve the Proposed Project. Therefore, impacts related to solid waste regulations would be **less than significant**. No mitigation is required.

4.20 WILDFIRE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

4.20.1 Impact Analysis

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

According to CAL FIRE, the Project Site and surrounding area are not within a State Responsibility Area (SRA) or a VHFHSZ.¹¹⁴ The Proposed Project would result in the development of an industrial building and associated improvements on the 10.21-acre Project Site. As previously discussed in Section 4.9, Hazards and Hazardous Materials, the Proposed Project is not expected to impact the circulation of emergency response services in the vicinity of the Project Site, nor introduce elements that would conflict with the operations of the City's emergency services. One (1) driveway on Kaiser Road and three (3) driveways along Syar Way would provide adequate access to the Project Site for emergency response vehicles. Therefore, the Proposed Project would not substantially impair any nearby roadways that may serve as emergency evacuation routes or interfere with any emergency evacuation routes within Napa. Since the Proposed Project would not be located within an SRA or VHFHSZ, and its implementation would not substantially impair an adopted emergency response plan or emergency evacuation plan, **no impact** would occur.

¹¹⁴ California Department of Forestry and Fire Protection (CAL FIRE). 2025. Fire Hazard Severity Zones Mapper. Website: <https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=988d431a42b242b29d89597ab693d008> (accessed January 29, 2026).

- b. Would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*

As discussed above, the Project Site is not within an SRA or VHFHSZ as designated by CAL FIRE and is located in an urbanized area not susceptible to wildfires. In addition, no hillside areas or natural areas prone to wildfires are located in the immediate vicinity of the Project Site. Winds may push wildfire smoke into the area of the Proposed Project; however, these conditions would be temporary, and if warranted, the local air quality control district would warn residents of potential impacts from wildfire smoke. The Proposed Project would be required to implement and abide by applicable building and fire codes and Napa General Plan Safety policies SN 5-1 through SN 5-5, which would reduce the wildfire risk at the Project Site. Therefore, because the Proposed Project would not be located within an SRA or VHFHSZ, and implementation of the Proposed Project would not exacerbate wildfire risks and potentially expose project occupants to wildfires, **no impact** would occur.

- c. Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*

The Project Site is within an urbanized area of the city that is already served by existing water, wastewater, power, and roadway infrastructure. The Proposed Project would connect to existing infrastructure networks in the surrounding area. In addition, the Proposed Project would be developed in compliance with CBC and the CFC and would be reviewed and approved by the NFD. Therefore, the Proposed Project would not create any additional environmental impacts due to the installation or maintenance of required infrastructure that is not already addressed and mitigated, if necessary, in this IS/MND. **No impact** would occur, and no mitigation is required.

- d. Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

As previously discussed, the Project Site is located within an urbanized area of Napa and is not located in an SRA or VHFHSZ, as designated by CAL FIRE. Therefore, the Project Site faces little to no wildfire risk, and post-fire conditions are not a concern. The Project Site is generally flat, no hillside areas or natural areas prone to wildfire are located in the immediate vicinity, and none of the surrounding areas or uses are prone to wildfires. Therefore, implementation of the Proposed Project would not expose persons or structures to post-fire slope instability or post-fire drainage. **No impact** would occur.

4.21 MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☒	☐	☐
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 adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

4.21.1 Impact Analysis

- a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?*

As discussed and analyzed in this document, with all identified mitigation measures implemented by the Proposed Project, the construction and operation of the Proposed Project would not substantially degrade the quality of the environment; substantially reduce the habitat, population, or range of a plant or animal species; or eliminate important examples of California history or prehistory. Therefore, the Proposed Project's potential impacts in the referenced categories would be **less than significant with mitigation incorporated**.

- 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)?*

The Proposed Project would have either no impact, a less-than-significant impact, or a less-than-significant impact with mitigation incorporated with respect to all environmental issues pursuant to CEQA. Due to the limited scope of direct physical impacts to the environment associated with the Proposed Project, the Proposed Project's impacts would generally be individually limited and not cumulatively considerable due to the site-specific nature of the potential impacts.

For the topics of aesthetics, agriculture and forestry resources, energy, greenhouse gas emissions, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, utilities and service systems, and wildfire, the project design and compliance with regulatory requirements would ensure that the project would have no impacts or less than significant impacts; therefore, the Proposed Project would not substantially contribute to any potential cumulative impacts for these topics.

For the topic of air quality, **Mitigation Measures AIR-1** would ensure that construction of the Proposed Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment status under an applicable federal or State ambient air quality standards.

For the topic of biological resources, **Mitigation Measures BIO-1a through BIO-4b** would ensure that potential impacts to special-status species including Swainson's hawk and Crotch's bumble bee, and nesting birds would be mitigated to less than significant levels.

For the topic of cultural resources, **Mitigation Measures CUL-1 through CUL-4** would ensure that any previously unknown archaeological resources or human remains encountered during construction are properly identified, evaluated, and protected.

For the topic of geology and soils, **Mitigation Measure GEO-1** would ensure that the Proposed Project would not result in any significant impacts related to the discovery of paleontological resources.

For the topic of hazards and hazardous materials, compliance with the =project-specific recommendations provided in the Phase I ESA, including **Mitigation Measure HAZ-1**, would ensure that the Proposed Project would not result in any significant impacts related to the release of hazardous materials into the environment.

For the topic of tribal cultural resources, **Mitigation Measure TCR-1 and Mitigation Measures CUL-1 through CUL-4** would ensure that tribal cultural resources uncovered during project activities are properly handled.

All environmental impacts that could result from the Proposed Project would be reduced to less than significant levels through implementation of the mitigation measures provided in Sections 4.3, Air Quality, 4.4, Biological Resources, 4.5, Cultural Resources, 4.7, Geology and Soils, and 4.9, Hazards and Hazardous Materials, and 4.18, Tribal Cultural Resources. Implementation of these measures would ensure that the impacts of the project would be below established thresholds of significance and that these impacts would not combine with the impacts of other cumulative projects to result in a cumulatively considerable impact on the environment as a result of project development. In addition, cumulative effects resulting from build-out of the City's General Plan were previously identified in the General Plan EIR. The type, scale, and location of the Proposed Project is consistent with the General Plan. Because of this consistency, the potential cumulative impacts of the Proposed Project would fall within the impacts identified in the City's General Plan EIR. Therefore, with all incorporated mitigation measures, the Proposed Project would not have any potential impacts that would be considered cumulatively considerable.

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

The Proposed Project's potential to result in environmental effects that could directly or indirectly impact human beings has been evaluated in this IS/MND. Based on the analysis provided throughout this IS/MND, with incorporation of mitigation measures and regulatory compliance measures, the Proposed Project would not result in any environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly. With the implementation of the recommended mitigation measures, all environmental effects that could adversely affect human beings would be **less than significant with mitigation incorporated**.

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