



Zinfandel Subdivision Project

CEQA Guidelines Section 15183 Consistency Checklist

City of Napa, Napa County, California

State Clearinghouse Number 95-03-3060

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ACRONYMS AND ABBREVIATIONS

µg/m ³	micrograms per cubic meter
AAQS	Ambient Air Quality Standards
AB	Assembly Bill
ABAG	Association of Bay Area Governments
ACC II	Advanced Clean Cars II
ADA	Americans with Disabilities Act
ADU	accessory dwelling unit
AERMOD	American Meteorological Society/EPA Regulatory Model
AFY	acre-feet per year
Air Basin	San Francisco Bay Area Air Basin
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
APN	Assessor's Parcel Number
AQP	Air Quality Plan
ARB	California Air Resources Board
ASF	age sensitivity factor
BAC	Bicycle Advisory Committee
BASMAA	Bay Area Stormwater Management Agencies Association
Bay Area Air District	Bay Area Air Quality Management District
BERD	Built Environmental Research Directory
BGS	below ground surface
BMP	Best Management Practice
CAL FIRE	California Department of Forestry and Fire Protection
Cal/EPA	California Environmental Protection Agency
Cal/OSHA	California Occupational Safety and Health Administration
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Standards Code
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CBC	California Building Standards Code
CDF	California Department of Finance

CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CGS	California Geological Survey
CHL	California Historical Landmarks
CHRIS	California Historical Resources Information System
CKG	CKG Environmental, Inc.
c/mve	collisions per million vehicles entering
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO _{2e}	carbon dioxide equivalent
CPF	cancer potency factor
CPHI	California Points of Historical Interest
CPUC	California Public Utilities Commission
CRA	Cultural Resources Assessment
CRHR	California Register of Historical Resources
dBA	A-weighted decibel
DOC	California Department of Conservation
DPM	diesel particulate matter
DPR	California Department of Parks and Recreation
DTSC	California Department of Toxic Substances Control
EIR	Environmental Impact Report
EMFAC	EMission FACtors mobile source emissions model
Energy Code	Building Energy Efficiency Standards
EO	Executive Order
EPA	United States Environmental Protection Agency
ESA	Environmental Site Assessment
EV	electric vehicle
FAR	floor area ratio
FCS	FirstCarbon Solutions
FEIR	Final Environmental Impact Report
FEMA	Federal Emergency Management Agency
FHSZ	Fire Hazard Severity Zone
FIRM	Flood Insurance Rate Map
FMMP	Farmland Mapping and Monitoring Program

FTA	Federal Transit Administration
GHG	greenhouse gas
GIS	Geographic Information System
GPD	gallons per day
GSP	Groundwater Sustainability Plan
HARP	Hot Spots Analysis and Reporting Program
HARP2	Hot Spots Analysis and Reporting Program Version 2
HARP-RAST	HARP Risk Assessment Stand-alone Tool
HDM	Highway Design Manual
HDR	High Density Residential
HHWE	Household Hazardous Waste Element
HI	Hazard Index
HMMP	Hazardous Materials Management Plan
HOA	Homeowner's Association
HRA	Health Risk Assessment
HVAC	heating, ventilation, and air conditioning
ICC	International Code Council
in/sec	inch per second
kWh	kilowatt-hour
LDR	Low Density Residential
L _{eq}	equivalent noise/sound level
LID	Low Impact Development
lbs	pounds
L _{max}	maximum noise/sound level
LOS	Level of Service
LRA	Local Responsibility Area
MEIR	Maximally Exposed Individual Resident
MERV	Minimum Efficiency Reporting Values
MIR	Maximally Impacted Sensitive Receptor
MLD	Most Likely Descendant
MMS	Modified Mercalli Intensity Scale
MND	Mitigated Negative Declaration
mph	miles per hour
MRP	Municipal Regional Permit
MRZ	Mineral Resource Zone

MS4	Municipal Separate Storm Sewer Systems
MT	metric tons
MTC	Metropolitan Transportation Commission
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NapaSan	Napa Sanitation District
NCSPPP	Napa Countywide Stormwater Pollution Prevention Program
NFD	City of Napa Fire Department
NO _x	nitrogen oxides
NPD	Napa Police Department
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NRWS	Napa Recycling and Waste Services
NVT	Napa Valley Transit
NVUSD	Napa Valley Unified School District
NWIC	Northwest Information Center
O ₃	ozone
OEHHA	Office of Environmental Health Hazard Assessment
OES	Office of Emergency Services
OHP	Office of Historic Preservation
OHWM	ordinary high water mark
OPR	California Governor's Office of Planning and Research
PCB	polychlorinated biphenyl
PG&E	Pacific Gas and Electric Company
PHEV	plug-in hybrid-electric vehicle
PM ₁₀	particulate matter less than 10 microns in diameter
PM _{2.5}	particulate matter less than 2.5 microns in diameter
PPV	peak particle velocity
PQP	Public/Quasi-Public
REL	Reference Exposure Level
RGH	RGH Consultants
ROG	reactive organic gases
RPS	Renewable Portfolio Standard
RWQCB	Regional Water Quality Control Board
RUL	Rural Urban Line

SB	Senate Bill
SCS	Sustainable Communities Strategy
SGMA	Sustainable Groundwater Management Act
SLF	Sacred Lands File
SMARA	Surface Mining and Reclamation Act
SR	State Route
SRA	State Responsibility Area
SRRE	Source Reduction and Recycling Element
STA	Solano Transportation Authority
SWITRS	Statewide Integrated Traffic Records System
SWP	State Water Project
SWPPP	Storm Water Pollution Prevention Plan
SWRF	Soscol Water Recycling Facility
TAC	toxic air contaminant
TAZ	traffic analysis zone
TCM	Transportation Control Measures
TCR	Tribal Cultural Resource
UBC	Uniform Building Code
UGB	Urban Growth Boundary
USGS	United States Geological Survey
UWMP	Urban Water Management Plan
VHFHSZ	Very High Fire Hazard Severity Zone
VINE	Napa Valley Intercity Neighborhood Express
VMT	Vehicle Miles Traveled
WDR	Waste Discharge Requirement
WEAP	Worker Environmental Awareness Program
ZEV	Zero-Emission Vehicle

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1 - INTRODUCTION

This checklist and attached supporting documents (Consistency Checklist), have been prepared to determine whether and to what extent the Zinfandel Subdivision Project (proposed project) is consistent with the development density established by the 2020 General Plan, for which the City of Napa certified a Final Environmental Impact Report on December 1, 1998 (2020 General Plan FEIR) (State Clearinghouse [SCH] No. 95-03-3060), or whether there are project-specific significant effects which are peculiar to the proposed project or its site requiring additional environmental review.

1.1 - CEQA Assessment

The following Consistency Checklist has been prepared pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15183 (Projects Consistent with a Community Plan or Zoning) to determine whether the proposed project requires additional environmental review.

Where substantial evidence demonstrates a project's environmental effects were studied in the 2020 General Plan FEIR or can be addressed through uniform policies and procedures, CEQA Guidelines Section 15183 mandates that projects which are consistent with the development density established by existing zoning, community plan, or general plan policies for which a Final EIR was certified (in this case, the Zinfandel Subdivision Project) shall not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site.

Impacts that are determined in the Consistency Checklist to be peculiar to the project or parcel may be evaluated in a streamlined Mitigated Negative Declaration (MND) if impacts can be reduced to below a level of significance. If effects would be significant and unavoidable, an EIR limited to evaluating those impacts that are peculiar to the parcel or project would be appropriate. This Consistency Checklist will identify any topical areas that may require further project-specific analysis consistent with Section 15183. Topical areas that do not have project-specific peculiar impacts are identified in this Consistency Checklist as being exempt from further review.

1.2 - Summary of Results

The Consistency Checklist confirms that the proposed project's potential impacts on all environmental factors, except biological resources, have been previously analyzed and mitigated as needed, consistent with the 2020 General Plan and other regulatory frameworks. Therefore, these topics are exempt and no further review is required for these areas.

Focused environmental review will be conducted to address potential project impacts to biological resources and to identify mitigation measures required to reduce potentially significant impacts to a less than significant level. The City has determined that this subsequent analysis of biological resources will be summarized in an MND.

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2 - PROJECT DESCRIPTION

2.1 - Project Location and Setting

2.1.1 - Project Location

The proposed project is located on an approximately 9.56-acre site located at 1583 and 1687 El Centro Avenue in the City of Napa (City), in Napa County (County), California (Exhibit 1). The project site corresponds to Assessor's Parcel Numbers (APNs) 038-361-009 and 038-361-010. Regional access is provided by State Route (SR) 29, which is approximately 0.22 mile west of the project site.

The project site is bounded by El Centro Avenue to the north, Salvador Channel to the south, and single-family homes to the east and west. The single-family residence located at 1657 El Centro is not part of the proposed project and is excluded from the project boundary (Exhibit 2). The project site is located on the *Napa, California* United States Geological Survey (USGS) 7.5-minute Topographic Quadrangle Map (Latitude 38° 18'15.19" N, Longitude 122° 19'08.48" W).

2.1.2 - Existing Development and Land Use Activities

The project site is currently developed with vineyards and also contains one single-family residence, a detached garage, small outbuildings, and a driveway connecting to El Centro Avenue. Salvador Channel runs through the southern portion of the project site, separating approximately 1.07 acres from the main project site. A pedestrian bridge in the southeastern portion of the project site crosses Salvador Channel, providing access to the southernmost portion of the project site. Aside from the vineyards and structures, the project site currently contains native oak trees and landscape fruit trees near the Salvador Channel and residence. Additionally, roughly half of the site is located within the Federal Emergency Management Agency's (FEMA's) National Flood Hazard Zone AE, which represents an area with a 1 percent chance of flooding annually (Exhibit 3).

2.1.3 - General Plan and Zoning Designations

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

The project site has a land use designation of Single-Family Residential (SFR-20) in the operative 2020 General Plan.¹ The SFR-20 designation provides for detached single-family homes, second units, planned unit and cluster developments, mobile homes, manufactured housing, and compatible uses, such as day care and residential care facilities. Residential densities range from four to eight dwelling units per acre. The proposed project would have a housing density of approximately 5.33 dwelling units per acre, which is within the identified range.²

The site is zoned Single-Family Residential with a minimum lot size of 4,000 square feet (RS 4).³ The RS 4 zone implements the single-family residential category of the General Plan and applies to areas intended to develop into a single-family detached unit pattern. RS areas typically include custom home subdivisions on hillsides or constrained sites; the presence of Salvador Channel across the southern portion of the site constrains the potential for development. This district provides opportunities for low-density detached single-family homes, accessory dwelling units (ADUs), clustered and planned developments, mobile homes, manufactured housing, and compatible uses, such as day care and smaller residential care facilities.⁴

Proposed lot sizes would range from approximately 3,531 to 9,708 square feet. To meet the minimum lot size requirements of the RS 4 zone (4,000 square feet), the applicant requests approval for the use of Small Lot Development Standards for nine of 51 proposed lots. This would allow the proposed project to achieve the required density given the site constraints, which include the parcel shape and the need to observe required setbacks from Salvador Channel. Setbacks would be consistent with Section 17.52.110 of the City of Napa Municipal Code (Napa Municipal Code), which pertains to creek setbacks, and with Section 17.52.470, which pertains to small lots (less than 4,000 square feet in size).

2.1.1 - Surrounding Land Uses

The project site is surrounded by the following land uses:

North: El Centro Avenue; single-family residential properties lands designated as Low Density Residential (LDR) and zoned Single-Family Infill with a minimum lot size of 4,000 square feet (RI 4) and Single-Family Residential with a minimum lot size of 5,000 square feet (RS 5). Additionally, multi-family residential properties zoned as Multi-Family Residential (RM) are located to the northwest, and Willow Elementary School is located to the northeast on land zoned Public/Quasi-Public (PQP).

¹ City of Napa. Envision Napa 2020: City of Napa General Plan, Land Use. December 1, 1998.

² Calculated by dividing 9.7 acres by 51 lots. 9.7 acres represents the acreage of the project site which would be developed under the proposed project because one existing single-family home would be retained.

³ 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 May 7, 2025.

⁴ City of Napa. 2022. Municipal Code 17.08.010 Specific purposes. Website: <https://ecode360.com/43396456#43396456>. Accessed May 7, 2025.

South: Salvador Channel; single-family residential properties designated as LDR and zoned RI 4 and RS 5.

East: Single-family residential properties designated as LDR and zoned RS 4.

West: Multi-family residential properties designated as High Density Residential (HDR) and zoned RM.

2.2 - Project Background and Previous Environmental Review

2.2.1 - General Plan

The City prepared and adopted the 2020 General Plan on December 1, 1998, which is an update from its 1982 General Plan providing policy guidance and implementation strategies to meet future planning needs for the City. The 2020 General Plan consists of two documents: the Draft Policy Document, which presents goals, policies, and implementation programs for each of the General Plan elements to guide future development within the City's planning area over the next 25 years; and the Draft Background Report, which outlines existing conditions for each General Plan element with an understanding for the policies and programs presented in the Draft Policy Document. As previously mentioned, the application for the proposed project was completed prior to the adopted on the 2040 General Plan and the application is subject to the goals, policies, and implementation programs of the 2020 General Plan.

2.2.2 - General Plan Environmental Impact Report

The City certified a Program FEIR for implementation of the 2020 General Plan to evaluate the significant environmental effects on adopting and implementing the 2020 General Plan. The 2020 General Plan FEIR provides baseline environmental information and evaluates the potential environmental impacts for foreseeable future development that may occur with implementation of the 2020 General Plan without site plans associated with those future projects. The City may use the 2020 General Plan FEIR when making decisions that implement the policies and programs identified in the 2020 General Plan and to prepare any additional environmental documents.

2.3 - Project Description

2.3.1 - Development Summary

The project applicant, Crown Realty Property Management, proposes to develop a 51-lot subdivision containing 51 single-family homes, 12 ADUs, 10 junior ADUs, and related improvements on approximately 9.56 acres (Exhibit 4). The 51 lots would be developed into two distinct areas separated by the Salvador Channel. The northern area is significantly larger and would contain 49 of the residential lots while the smaller southern area would contain the remaining two residential lots.

The existing single-family dwelling, the detached garage, and the private pedestrian bridge on-site would be demolished. Additionally, the existing vineyards on the project site would be removed, as well as 29 trees.

The proposed project would also include various off-site improvements (Exhibit 5) totaling approximately 1.3 acres including:

- Creation of a terrace along the channel's northern and southern bank and two stormwater outfalls above the channel's ordinary high water mark (OHWM).
- Construction of an 8-foot-wide walking trail along the southern side of Salvador Channel with 2-foot-wide shoulders on each side (replacing an existing informal walking path) connecting to a future Class I trail planned along Salvador Channel between Jefferson Street and SR-29.
- Dedication to the City of a 10-foot-wide right-of-way along the El Centro frontage, totaling approximately 0.17 acre. Improvements along its entire frontage with El Centro Avenue consistent with the improvements that have already been made and the City's future plans for the roadway. Such improvements include widening El Centro Avenue by approximately 12 feet and providing a separate sidewalk which would improve access for pedestrians and connect the site to the surrounding pedestrian network.

2.3.2 - Design and Appearance

The proposed project would include home designs that are a combination of two styles, Urban Farmhouse and Napa Valley Contemporary. All home designs would include a mix of high-quality exterior finishes intended to complement one another and the existing traditional home styles of the surrounding neighborhood. There are a total of eight different floor plans, ranging in size from 1,004 square feet to 2,362 square feet. The proposed project would include 21 single-story homes, 30 two-story homes, 12 ADUs, and 10 junior ADUs. The 12 ADUs would range in size from approximately 384 square feet to approximately 682 square feet.

2.3.3 - Circulation

Vehicular Circulation

The northern area of the site would be accessed via a proposed residential street called Clementina Circle, which would form a loop on the south side of El Centro Avenue. The portion of the project site located south of Salvador Channel would be accessed via a private driveway extending east from Lassen Street.

Parking

Each residence would have two on-site parking spaces. Garages would have a 20-foot minimum setback from the back of the sidewalk or edge of the private driveway to provide on-site parking within driveways. A total of 244 parking spaces would be provided (Exhibit 6), which exceeds the 200

parking spaces required by the Municipal Code, Section 17.54.040. Of the 244 parking spaces, 91 would be garage spaces, 95 would be driveway spaces, and 58 would be on-street parking spaces.

Pedestrian Access

Pedestrian access would be provided via sidewalks on both sides of the proposed Clementina Circle and along the project's frontage on El Centro Avenue.

Bicycle Access

The proposed project would implement markings for Class III bike lanes along El Centro Avenue between Byway East and Jefferson Street as a condition of approval to be imposed by the City.

2.3.4 - Landscaping and Open Space

Landscaping would include trees with moderate irrigation needs, such as trident maple (*Acer buergerianum*), red maple (*Acer rubrum*), eastern redbud (*Cercis canadensis*), ginko (*Ginkgo biloba*), Chinese pistache (*Pistacia chinensis*), and valley oak (*Quercus lobata*) (Exhibit 7). A bioretention area would be provided in the northern portion of the project site, between Lot 19 and Lot 20. A second bioretention area would be provided in the southern portion of the project site, adjacent to Lot 50. Additionally, bioretention areas would be provided adjacent to Lot 27 and Lot 28 along El Centro Avenue. Front yard landscaping would be installed but not maintained by the Homeowner's Association (HOA). The channel and terraced areas would be landscaped, compliant with current local water district regulations.

2.3.5 - Utilities

Water and Wastewater

The proposed project would connect to existing water and sanitary sewer lines underneath El Centro Avenue for the northern portion of the project site (Exhibit 8a) and underneath Lassen Street for the southern portion of the project site (Exhibit 8b). All lots would be served by a separate gravity sewer lateral. Sewer laterals would be 4 inches in diameter with a 2 percent minimum slope to the sewer main. All sewer laterals would be a minimum of 5 feet from any neighboring property lines. Additionally, sewer laterals would not be located within driveways. All lots would be served off the water main in the streets.

Storm Drainage

Stormwater runoff from the project site would be routed to four bioretention areas. These bioretention areas would be constructed pursuant to the criteria in the Bay Area Stormwater Management Agencies Association (BASMAA) Post-Construction Manual, providing a 6-inch ponding reservoir per BASMAA requirements, which is a sufficient depth so that the 1-year, 1-hour storm event would not reach the overflow elevations.

The following utility providers would provide services to the project site:

- Sewer: Napa Sanitation District
- Water: City of Napa Water Division
- Electricity: Pacific Gas and Electric Company (PG&E)
- Storm Drain: City of Napa
- Solid Waste/Recycling: Napa Recycling and Waste Services (NRWS)

2.3.6 - Phasing and Construction

Construction of the proposed project is anticipated to begin in late 2025 and would last approximately 18 to 36 months. Construction activities would consist of demolition, grading, underground utilities and street construction, building construction, and landscaping.

The proposed project would require that all construction equipment be maintained and tuned to meet appropriate United States Environmental Protection Agency (EPA) and California Air Resources Board (ARB) emissions requirements, including use of only Tier 4 engines in off-road equipment and cleaner heavy-duty trucks to reduce air pollutant emissions associated with the proposed project.

2.4 - Discretionary Approvals

The proposed project requires the following discretionary approvals from the City of Napa, which is the CEQA Lead Agency for the proposed project.

- Tentative Subdivision Map–Vesting
- Design Review Permit–Subdivision and Homes
- Use Permit–Small Lot Development

In addition, the following ministerial actions would be required by the City for implementation of the proposed project:

- Demolition permits
- Grading permits
- Building permits

A number of other agencies, in addition to the City, will serve as Responsible and Trustee Agencies, pursuant to CEQA Guidelines Section 15381 and Section 15386, respectively. This Consistency Checklist will provide environmental information to these agencies and other public agencies, which may be required to grant approvals or coordinate with other agencies, as part of project implementation. These agencies may include but are not limited to the following:

- California Department of Transportation (Caltrans)
- California Department of Fish and Wildlife (CDFW)
- Bay Area Air Quality Management District (Bay Area Air District)
- North Coast Regional Water Quality Control Board (RWQCB)

ZINFANDEL SUBDIVISION PROJECT CEQA GUIDELINES SECTION 15183 CONSISTENCY CHECKLIST
CITY OF NAPA

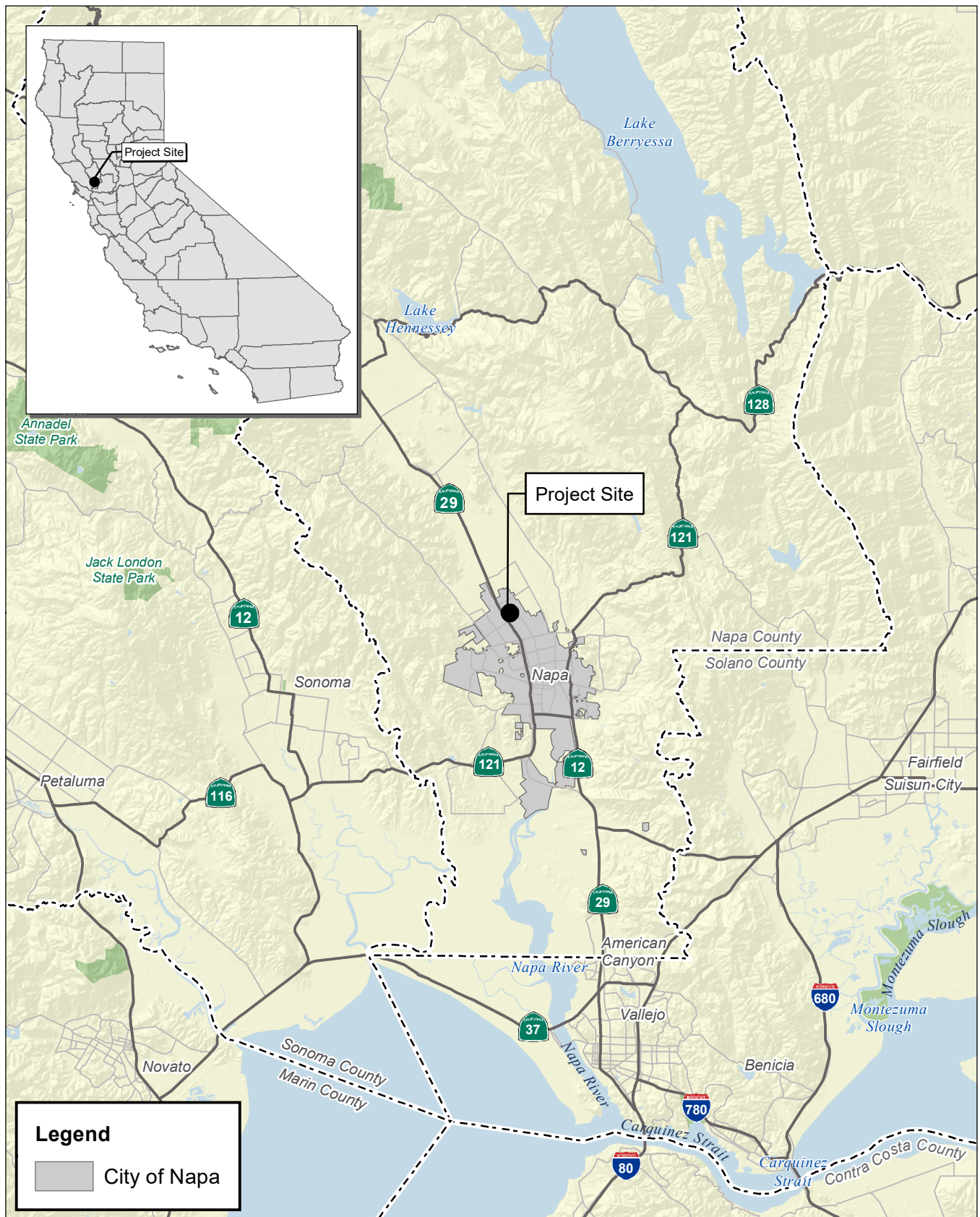
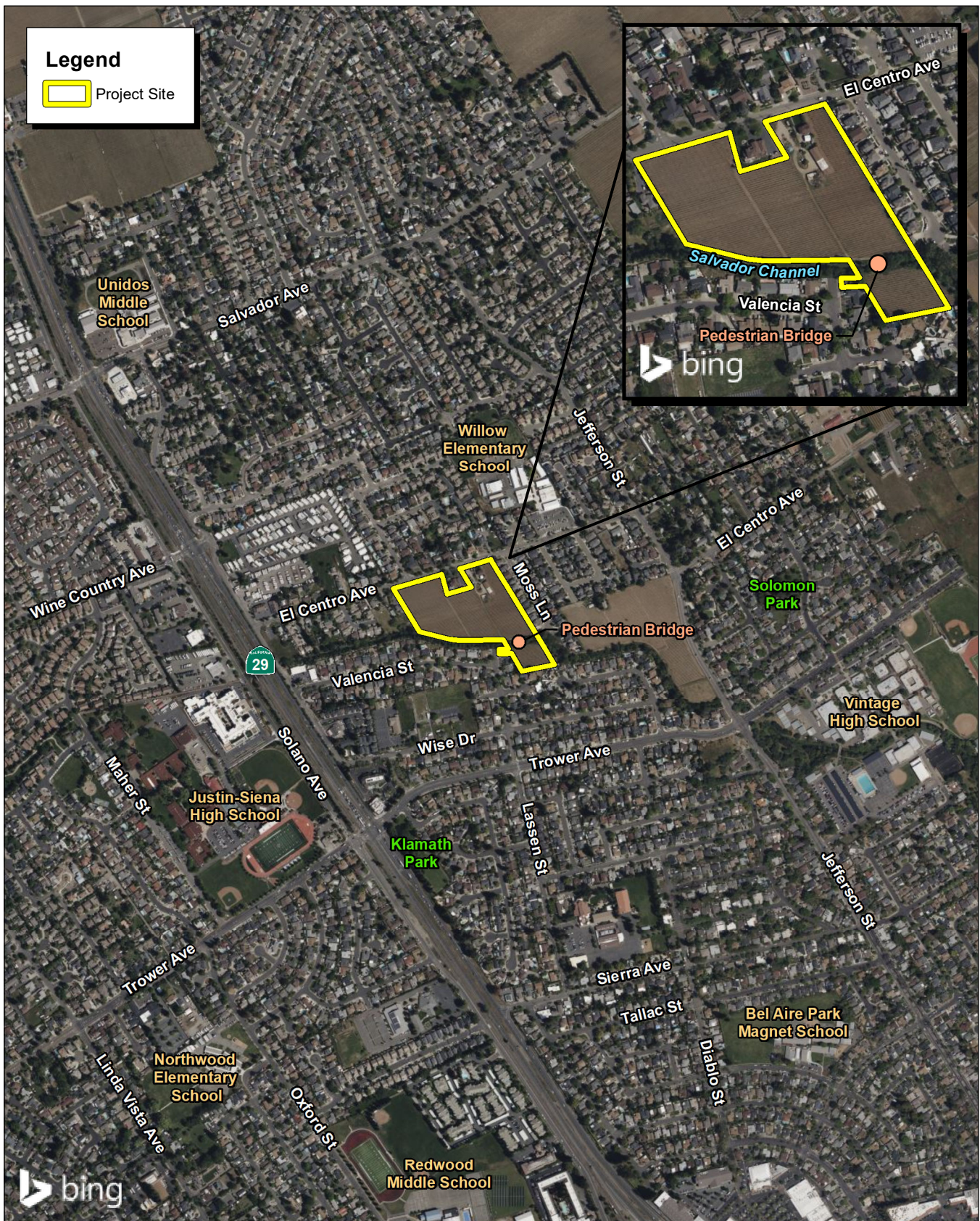


Exhibit 1
Regional Location Map

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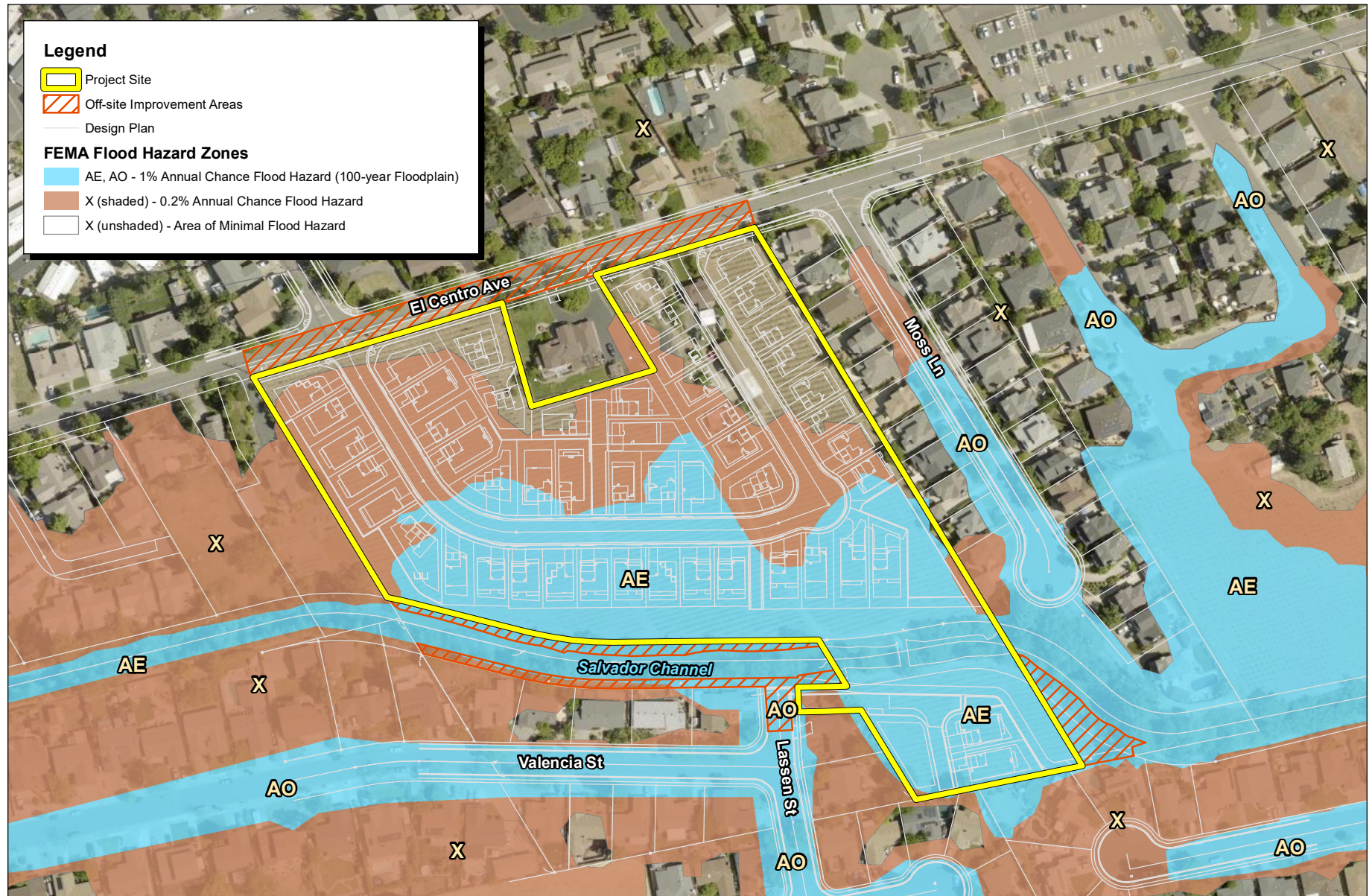


Source: Bing Aerial Imagery. RSA Consulting Civil Engineers.



Exhibit 2
Local Vicinity Map

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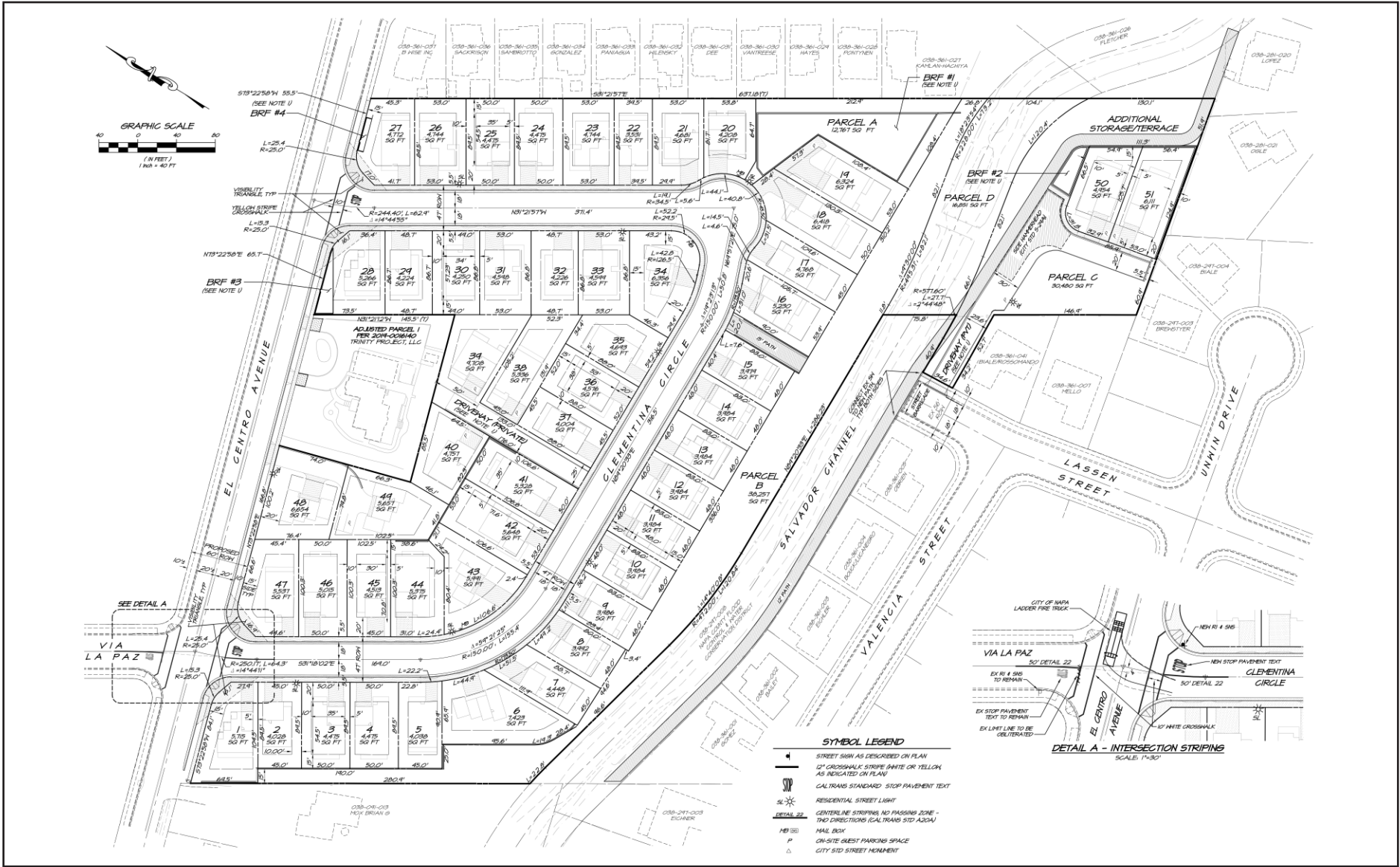


Source: ESRI World Imagery, RSA Consulting Civil Engineers, FEMA National Flood Hazard Layer (NFHL).



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CITY OF NAPA



Source: RSA. Sept 15, 2023.

Exhibit 4
Site Plan

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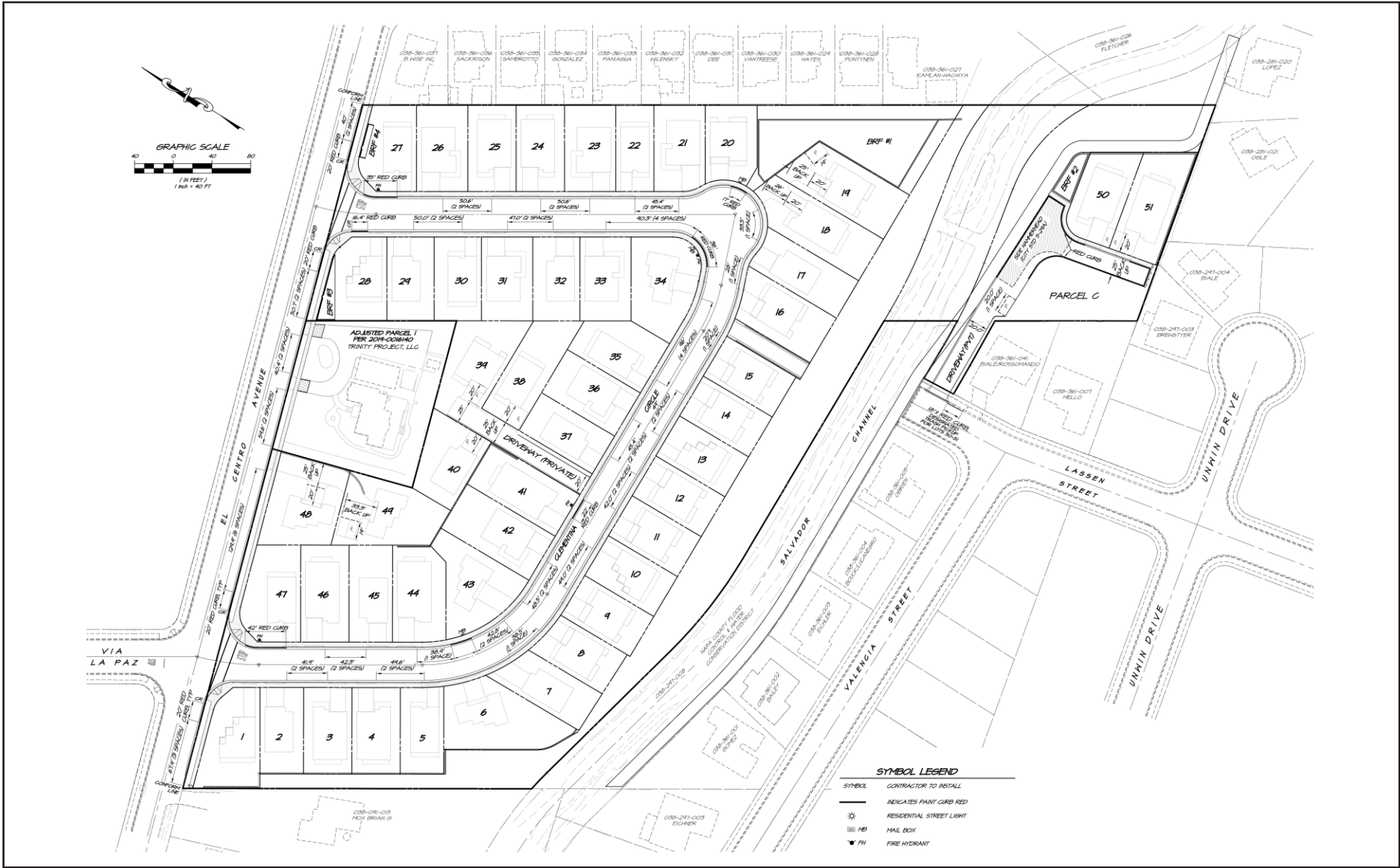


Source: ESRI World Imagery, RSA Consulting Civil Engineers.



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CITY OF NAPA



Source: RSA Consulting Civil Engineers & Surveyors, 9/15/2023.

Exhibit 6
Parking Plan

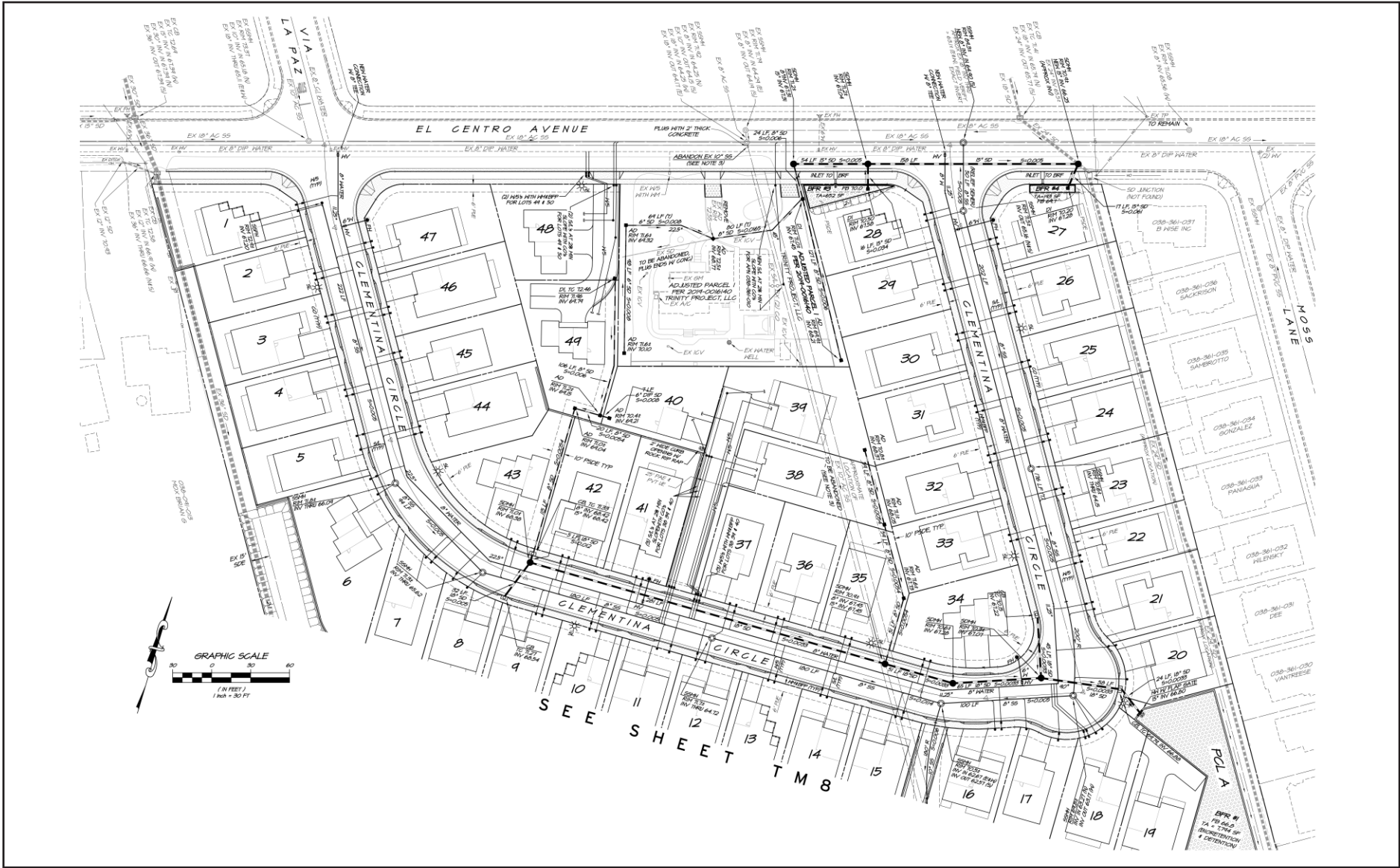
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Source: GSM Landscape Architects, Inc. Sept 15, 2023.

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CITY OF NAPA

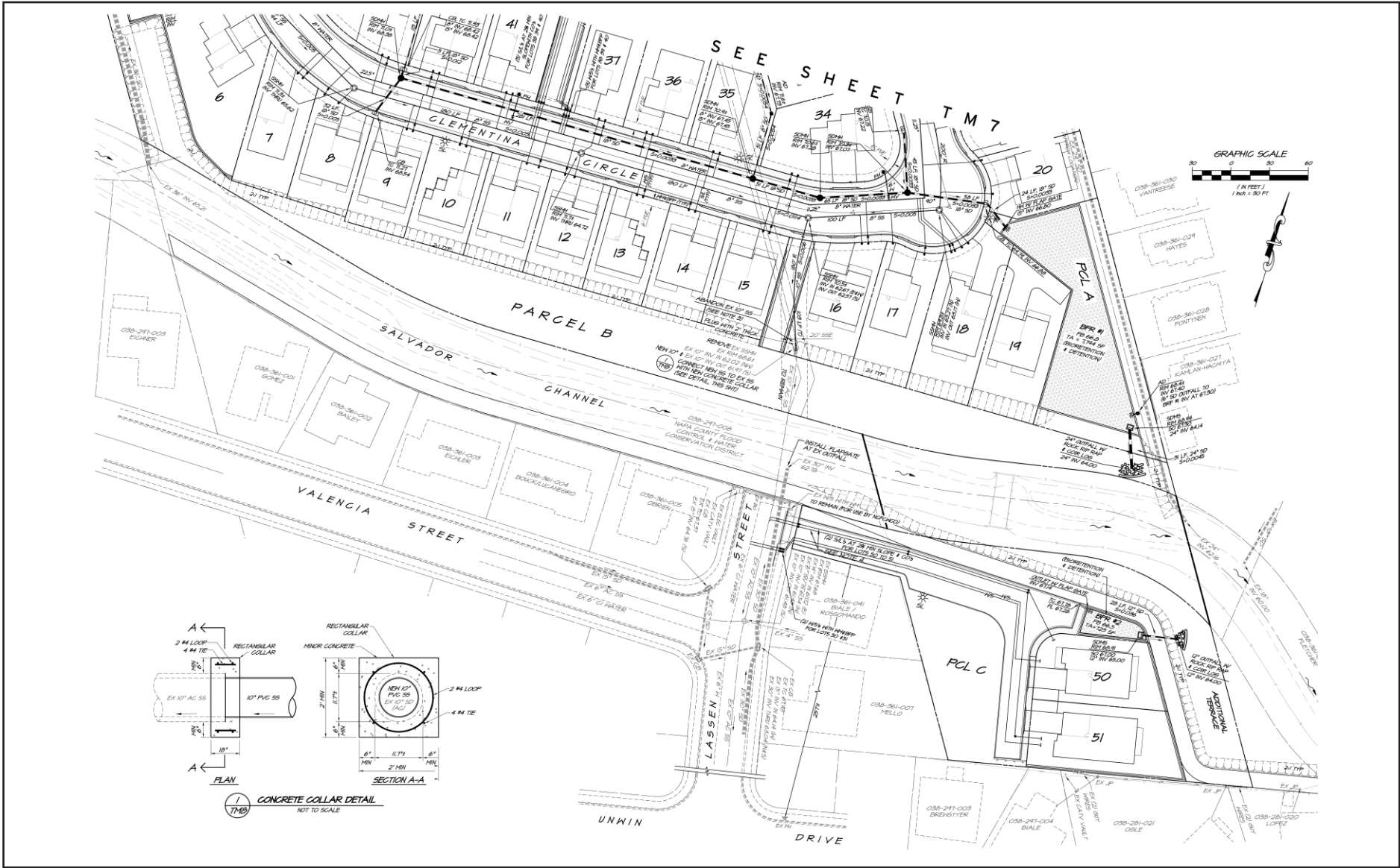


Source: RSA Consulting Civil Engineers & Surveyors, 9/15/2023.

Exhibit 8a
Utility Plan - North

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CITY OF NAPA



Source: RSA Consulting Civil Engineers & Surveyors, 9/15/2023.

Exhibit 8b
Utility Plan - South

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3 - CEQA GUIDELINES SECTION 15183: PROJECTS CONSISTENT WITH A COMMUNITY PLAN OR ZONING

CEQA Guidelines Section 15183 mandates that projects which are consistent with the development density established by existing zoning, community plan, or general plan policies for which an Initial Study/Mitigated Negative Declaration (IS/MND) was certified shall not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. This streamlines the review of such projects and reduces the need to prepare repetitive environmental studies.

Proposed Project Qualifies for Streamlined Review under CEQA Guidelines Section 15183

CEQA Section 15183 applies to the proposed project since it meets all of the following conditions.

(d)(1)(B) The project is consistent with a zoning action which zoned or designated the parcel on which the project would be located to accommodate a particular density of development.

A project is consistent with established zoning and density if the project is the same or less than the standard contemplated for the involved parcel(s) in the general plan for which an EIR has been certified, and the project complies with the density standards contained in that plan (CEQA Guidelines § 15183(i)(2)). Density standards are expressed in various ways, including based on the number of dwelling units per acre, the number of people in a given area, floor area ratio (FAR), and other measures of building intensity, building height, and size limitations and use restrictions.

The project site is zoned Single-Family Residential with a minimum lot size of 4,000 square feet (RS 4). Proposed lot sizes would range from approximately 3,531 to 9,708 square feet. The applicant requests approval for the use of Small Lot Development Standards for nine of 51 proposed lots to achieve the required density given the site constraints, which include the parcel shape and the need to observe required setbacks from Salvador Channel. Accordingly, with implementation of the Small Lot Development Standards, the proposed project would be within this density designation and would meet the requirements of this section.

(d)(1)(C) The project is consistent with the 2020 General Plan.

The 2020 General Plan anticipates residential development under General Plan buildout and has a land use designation of Single-Family Residential (SFR-20). The SFR-20 designation provides for detached single-family homes, second units, planned unit and cluster developments, mobile homes, manufactured housing, and compatible uses, such as day care and residential care facilities. Residential densities range from 4 to 8 dwelling units per acre. The proposed project would have a housing density of approximately 5.33 dwelling units per acre, which is within the identified range.

(d)(2) An EIR was certified by the lead agency for the zoning action, the community plan, or the general plan.

The General Plan was approved pursuant to the Program EIR, certified on December 1, 1998 (State Clearinghouse [SCH] No. 95-03-3060). The proposed project is within the scope of and is consistent with the relevant provisions of the adopted General Plan and the certified Program EIR, with the exception of impacts related to biological resources. Therefore, for the purposes of this analysis, the General Plan and certified Program EIR establish and evaluate the development density and zoning for the project site. Accordingly, the proposed project meets the requirements of this section.

Accordingly, the Lead Agency may utilize this Consistency Checklist to document its decision that a subsequent environmental document is not required, except as needed to address biological issues peculiar to the proposed project.

4 - ENVIRONMENTAL CHECKLIST

CEQA Guidelines Section 15183(b) states that:

- (b) In approving a project meeting the requirements of this section, a public agency shall limit its examination of environmental effects to those which the agency determines, in an initial study or other analysis:
- (1) Are peculiar to the project or the parcel on which the project would be located;
 - (2) Were not analyzed as significant effects in a prior FEIR on the zoning action, general plan, or community plan, with which the project is consistent;
 - (3) Are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior FEIR prepared for the general plan, community plan or zoning action; or
 - (4) Are previously identified significant effects which, as a result of substantial new information which was not known at the time the FEIR was certified, are determined to have a more severe adverse impact than discussed in the prior FEIR.

The following pages of this document contain an Environmental Checklist that examines the project's potential environmental effects within the parameters outlined at CEQA Guidelines Section 15183(b). The Prior FEIR used for comparison is the 2020 General Plan FEIR certified by the City of Napa on December 1, 1998, including all impact determinations and significance thresholds utilized therein.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.1 Aesthetics					
Except as provided in Public Resources Code Section 21099, would the project:					
a) Have a substantial adverse effect on a scenic vista?	Less than significant impact	No	No	No	No
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a State Scenic Highway?	Less than significant impact	No	No	No	No
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	Less than significant impact	No	No	No	No
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Less than significant impact	No	No	No	No

a) Scenic Vista

Would the project: Have a substantial adverse effect on a scenic vista?

Summary of 2020 General Plan FEIR

The City is located within Napa Valley on relatively flat terrain with the rolling hills and mountain ridges to the east and west providing prominent views from public vantage points including SR-29 and the Napa River area. Important visual resources in the General Plan area include natural features, such as vineyards and riparian corridors along the Napa River and its tributaries that transect many residential neighborhoods, and built features, such as four defined gateways serving as visual entrances and exits for the City and neighborhoods and districts that share similar physical features. The Prior FEIR determined that the implementation of the 2020 General Plan would enhance the visual setting in the downtown area, as well as along key gateways, scenic corridors, crucial corridors, and major roadways in the City, by developing gateway and scenic corridor design guidelines for both public and private development in the vicinity.⁵ In addition, the Prior FEIR indicates that the Rural Urban Line (RUL) was delineated to prevent urbanization in the region's vineyards, hillsides, grasslands, and major marshlands and emphasizes special development standards for development within or adjacent to riparian corridors and other natural features outside of the RUL.⁶ Furthermore, various policies of the 2020 General Plan, including LU-4.1, LU-4.5, LU-1.2, LU-7.4, LU-9.1, and NR-1.7, would reduce potential impacts related to aesthetics by requiring new development to be consistent with existing neighborhoods, ensuring new development is designed to minimize adverse visual characteristics, and integrating development with the City's natural environment.⁷ Therefore, the Prior FEIR concluded that impacts associated with the implementation of the 2020 General Plan would be less than significant.

Proposed Project Analysis and Conclusion

A scenic vista is a viewpoint that provides a distant view of highly valued natural or manufactured landscape features for the benefit of the general public. Typical scenic vistas are locations where views of rivers, hillsides, and open space can be obtained, as well as locations where valued urban landscape features can be viewed in the distance. Scenic vistas of particular concern include the Vaca Range and Mayacamas Mountains, as well as views of agricultural fields and vineyards in the countryside adjacent to the City.⁸ The proposed project includes the development of a 51-lot subdivision containing 51 single-family homes, 12 ADUs, and 10 junior ADUs. While the project site does currently contain vineyards, the proposed project is entirely surrounded by single-family residential development and would be consistent with the surrounding uses, as well as the General Plan land use designation and zoning district for the project site (SFR-20 and RS 4, respectively), which allow for single-family detached units. According to the Prior FEIR, future infill development of

⁵ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Pages 3.6-3 – 3.6-4. December 1.

⁶ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Page 3.6-5. December 1.

⁷ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Pages 3.6-2 – 3.6-5. December 1.

⁸ City of Napa. 2022. City of Napa General Plan Update Partial Recirculated Draft Environmental Impact Report (2040 General Plan EIR). June.

agricultural lands within the City was not considered significant in regard to scenic resources because the visual quality provided by the vineyards and open space surrounding the City would continue to provide a context and visual identity for the City.⁹ As such, the proposed project's development of the existing vineyard would not cause significant impacts to the City's scenic resources. Additionally, given the relatively flat nature of the project site, and the proposed project's consistency with surrounding development, it would not block or impede views of the Vaca Range or Mayacamas Mountains. Moreover, based on a review of the Napa General Plan, the City has not identified or designated scenic vistas within or adjacent to the project site. Therefore, no impact would occur to a scenic vista. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. It would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

b) State Scenic Highways

Would the project: Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a State Scenic Highway?

Summary of 2020 General Plan FEIR

The City does not contain any officially designated State Scenic Highways, but the Prior FEIR identified two potential scenic highway corridors within the RUL: SR-29 and SR-121. These are locally recognized as scenic corridors within the City, and portions of these roadways are eligible for State Scenic Highway registration. The Prior FEIR further identified gateways that provide visual entrances into and exits from the City, including intersections at SR-29, SR-221, and SR-121.¹⁰ Other roadways with important scenic qualities are identified in the RUL serving as key vantage points to the natural features that define the City's visual character, including open space, rolling hills, ridgelines, and wetlands. The Prior FEIR determined that Policies LU-1.6, LU-5.2, and LU-5.8 of the 2020 General Plan would enhance scenic character of these potential scenic highway corridors.¹¹ The Prior FEIR concluded that impacts related to scenic resources within a State Scenic Highway would be less than significant.

Proposed Project Analysis and Conclusion

The California Scenic Highway Program was established in 1963 by the State Legislature with the responsibility of protecting and enhancing California's natural scenic beauty by identifying those portions of the State Highway System which, together with adjacent scenic corridors, require special conservation treatment. Scenic corridors consist of land that is visible from, adjacent to, and outside the highway right-of-way and is comprised primarily of scenic and natural features.¹² The City does

⁹ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Page 3.6-3. December 1.

¹⁰ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Pages 3.6-4 – 3.6-5. December 1.

¹¹ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Page 3.6-5. December 1.

¹² California Department of Transportation (Caltrans). 2018. State Scenic Highway System Map. Website: <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>. Accessed May 7, 2025.

not contain any officially designated State Scenic Highways. The nearest State Scenic Highway is a segment of SR-12 that is located 9.36 miles west of the project site. SR-12 is not visible from the project site and would not be impacted by the construction of the proposed project; as such, no impact to SR-12 would occur.

The 2020 General Plan Policy LU-1.6 indicates that SR-29, SR-121, and SR-221 are scenic gateways/corridors within the City. Specific segments of these highways are also eligible for designation as State Scenic Highways, meaning that these highways have been identified in the California Streets and Highways Code as having the potential to be designated as State Scenic Highways but have not yet received official designation.¹³ The project site is approximately 0.32-mile east of SR-29, 2.23 miles west of SR-121, and 4.36 miles northwest of SR-221. Because of distance and intervening topography and structures, such as the surrounding residential neighborhoods and vegetation along the highways, the project site is not visible from any of these highways. Therefore, the proposed project would have no impact on scenic resources within view of SR-29, SR-121, and SR-221. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

c) Visual Character

Would the project: In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Summary of 2020 General Plan FEIR

The Prior FEIR identified seven neighborhood typologies requiring new residential development to remain consistent with the neighborhood typology of a project's surrounding area to maintain City's qualities and community identity. Projects would be required to include similarities in streetscape, architectural character, topography, and density to existing development to ensure that newly developed neighborhoods share the same qualities as existing neighborhoods. In addition, the Prior FEIR determined that the City would adopt land use regulations to maintain the historic patterns of housing densities. The Prior FEIR also indicated that Napa Policy Resolution No. 27 would provide policies governing scenic quality, such as requiring landscaping plans and separate architectural reviews for signage. Therefore, the Prior FEIR concluded that impacts would be less than significant.¹⁴

¹³ California Department of Transportation (Caltrans). 2025. California State Scenic Highways. Website: <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>. Accessed: July 1, 2025.

¹⁴ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Pages 3.6-2 – 3.6-3. December 1.

Proposed Project Analysis and Conclusion

The proposed project is located in an urbanized area within the City of Napa and would be consistent with the land use and zoning designations of the project site with the use of Small Lot Development Standards allowed under the State Density Bonus Law. The proposed project would also be consistent with the required density for the RS 4 zoning district and would be required to comply with Napa Policy Resolution No. 27, which requires new developments to install lighting that limits light spillage into neighboring properties, and to produce a final landscape and irrigation plan designed and signed by a licensed landscape architect or landscape contractor that specifies that all plant materials used are free of pests, and that the Agricultural Commissioner would be notified of any plant deliveries from outside the County.¹⁵ The proposed project would also be required to comply with the architectural requirements of Napa Residential Design Guidelines and the General Plan. The Napa Residential Design Guidelines impose requirements for new developments in residential neighborhoods, including site plan requirements, grading and drainage control measures, landscaping standards, fencing and screening requirements, driveway and parking standards, and utility requirements.¹⁶ Therefore, the proposed project would not conflict with applicable zoning or other regulations governing scenic quality, and impacts would be less than significant. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

d) Light or Glare

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

Summary of 2020 General Plan FEIR

The Prior FEIR emphasized that Napa Policy Resolution No. 27 would require all new lighting from development projects to be directed downward through the use of shielding that would prevent light trespass and avoid glare. Furthermore, Napa Policy Resolution No. 27 requires that low-level lighting be utilized in parking areas. Therefore, the Prior FEIR concluded that impacts would be less than significant.¹⁷

Proposed Project Analysis and Conclusion

Excessive or inappropriately directed lighting can adversely affect nighttime views by reducing the ability to see the night sky and stars. Glare can be derived from unshielded or misdirected lighting sources. Reflective surfaces (i.e., polished metal) can also cause glare. Impacts associated with glare can range from simple nuisance to potentially dangerous situations (i.e., if glare is directed into the

¹⁵ City of Napa. 2002. Policy Resolution 27. December 3.

¹⁶ City of Napa Planning Department. 2004. Residential Design Guidelines. Website: <http://www.cityofnapa.org/DocumentCenter/View/402/Residential-PDF?bidId=>. Accessed May 7, 2025.

¹⁷ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Page 3.6-3. December 1.

eyes of motorists). Light-sensitive land uses in the area may include the residential neighborhoods to the east and west of the project site.

The project site currently contains one single-family residence, a detached garage, and a driveway connecting to El Centro Avenue. Aside from structures, the project site is developed with vineyards and also has native oak trees and landscape fruit trees near Salvador Channel and the residence. The proposed project consists of removing one single-family residence and other existing structures on the project site and constructing 51 single-family residences, which has the potential to create new sources of light and glare in addition to the light from surrounding homes and car headlights on El Centro Avenue. As discussed further in Section 4.14, Population and Housing, the growth induced by the proposed project was anticipated by the General Plan. However, the proposed project would be subject to Section 17.08.040 of the Municipal Code, which specifies that in residential districts, exterior lighting shall be directed or shielded to prevent glare onto public streets and abutting residential properties.¹⁸ Therefore, impacts would be less than significant. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

Applicable 2020 General Plan FEIR Mitigation Measures

None required.

Conclusion

With regard to Aesthetics, Light, and Glare, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. There is no new information of substantial importance, change in the proposed project, or change in the circumstances under which it would be undertaken identifying new significant effects, nor is there a substantial increase in the severity of previously identified impacts. The conclusions from the Prior FEIR remain unchanged when considering the implementation of the proposed project.

¹⁸ City of Napa. 2022. Municipal Code 17.08.040 Other development standards and requirements applicable to residential districts. Website: <https://ecode360.com/43396456#43396469>. Accessed May 7, 2025.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.2 Agriculture and Forestry Resources <i>In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the State's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.</i> 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 nonagricultural use?	Significant and unavoidable impact	No	No	No	No
b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract?	Less than significant impact	No	No	No	No
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))?	Not Applicable	No	No	No	No

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
d) Result in the loss of forest land or conversion of forest land to non-forest use?	Not Applicable	No	No	No	No
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or conversion of forest land to non-forest use?	Less than significant impact	No	No	No	No

a) Conversion of Important Farmland

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 nonagricultural use?

Summary of 2020 General Plan FEIR

The Prior FEIR indicated that the City is primarily urbanized. However, land dedicated to agricultural uses was identified in the southern portions of the City around the Stanly Ranch and Westwood Planning Areas. Small areas of vacant and underutilized land used for agricultural and grazing purposes are located in proximity to the City, such as Foster Road, Big Ranch Road, Wyatt Road, the Browns Valley hills, along with the Vintage, Beard, Terrace Shurtleff Planning Areas, and smaller parcels less than 1-acre in size that are scattered throughout the City. The Prior FEIR acknowledged that implementation of the 2020 General Plan would convert more than half of land dedicated to agricultural purposes that consist of prime agricultural soils to urbanized uses. The Prior FEIR determined that the conversion of those smaller vacant parcels in the RUL used for agriculture that are already surrounded by urbanized uses would result in less than significant impacts, while the conversion of larger parcels was considered significant. However, those larger parcels with Prime Farmland were found to not be greater than 10 acres or contiguous with larger cultivated areas. The

Prior FEIR concluded that the conversion of agricultural land from the implementation of the 2020 General Plan would be significant and unavoidable.¹⁹

Proposed Project Analysis and Conclusion

The proposed project could have a potentially significant impact if it would result in an unplanned conversion of Farmland. The California Department of Conservation (DOC) Farmland Mapping and Monitoring Program (FMMP) designates the project site as Prime Farmland and Farmland of Statewide Importance.²⁰ However, the project site was evaluated in the Prior FEIR for future residential development and is zoned for residential uses. As discussed above, the Prior FEIR determined that the impacts of the 2020 General Plan's buildout on prime agricultural soils within the Planning Area, including residential development consistent with the proposed project, would be significant and unavoidable. The project site is located within the Vintage Planning Area identified in the Prior FEIR. The Vintage Planning Area contains residential land uses and was expected to contribute approximately 1,611 new dwelling units at buildout, and as discussed further in Section 4.14, Population and Housing, the growth induced by the proposed project was accounted for by the Prior FEIR.²¹ Development of the proposed project would be consistent with planned growth under the General Plan, and thus, the proposed project would not result in any additional unplanned conversion of agricultural land to nonagricultural use. Therefore, impacts would be significant and unavoidable consistent with the Prior FEIR. The proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

b) Agricultural Zoning and Williamson Act Contracts

Would the project: Conflict with existing zoning for agricultural use, or a Williamson Act contract?

Summary of 2020 General Plan FEIR

The Prior FEIR identified approximately 1,037 acres of vacant and underutilized lands that are marginally used for agriculture within the RUL with the largest areas located along the City's perimeter and smaller parcels scattered throughout the City.²² The Prior FEIR indicated that implementation of the 2020 General Plan would establish measures where any additions to the RUL must meet five findings of the County Measure J growth management initiative, such as determining the suitability of land for urban development, the absence of prime agricultural soils or uses, and the existence of natural features that would buffer urban and rural uses and being contiguous to the existing RUL. Policy LU-3.2 of the 2020 General Plan would establish a buffer at the RUL to prevent conflicts between residential uses and agricultural lands, and Policy LU-3.3 would decrease the density of residential development within a quarter mile of the RUL. Furthermore, the Prior FEIR

¹⁹ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Page S-4. December 1.

²⁰ California Department of Conservation (DOC). 2017. Napa County Important Farmland 2016. June.

²¹ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Page 2-16. December 1.

²² City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Pages 3.2-2 – 3.2.3. December 1.

indicated that the proposed expansion of the RUL would not conflict with agricultural use as the areas proposed for expansion are already urbanized and those smaller vacant and underutilized parcels identified for agricultural uses within the already established RUL are surrounded by already existing contiguous urban development. As such, the Prior FEIR concluded that implementation of the 2020 General Plan would result in less than significant impacts related to conflict with agricultural zoning or Williamson Act contracts.²³

Proposed Project Analysis and Conclusion

There are no areas within the project site or the surrounding area that are under Williamson Act contracts. Furthermore, the project site is not zoned for agricultural uses. Therefore, no impacts would occur. The proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

c) Forest Zoning

Would the project: Conflict with existing zoning for forest land or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

Summary of 2020 General Plan FEIR

This checklist question was not included in the Prior FEIR. However, the Prior FEIR acknowledged that foreseeable urban development could encroach on open spaces and impact natural resources. The Prior FEIR determined that implementation of the 2020 General Plan would support the continued maintenance of the RUL to define the Urban Growth Boundary (UGB) and would minimize disturbance to the region's natural resources. Furthermore, the Prior FEIR mentioned that the 2020 General Plan would implement Policy LU-3.2, which establishes a buffer between residential land uses and agricultural lands in proximity to the RUL.

Proposed Project Analysis and Conclusion

The project site does not contain any areas designated as forest land or timberland. While the proposed project would remove existing vineyards, native oak trees, and fruit trees, the proposed project would replace these trees by planting approximately 66 new trees. No impacts would occur. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

²³ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Pages 3.2-4 – 3.2-5. December 1.

d) Conversion of Forest Land

Would the project: Result in the loss of forest land or conversion of forest land to non-forest use?

Summary of 2020 General Plan FEIR

This checklist question was not included in the Prior FEIR. However, the Prior FEIR determined that the City is highly urbanized and nearly built out, consisting of primarily urban land uses, which precludes viable production of randomly located parcels situated within the RUL. Furthermore, the Prior FEIR indicated that the 2020 General Plan contains policies intended to preserve surrounding open space lands outside the RUL for natural resource uses and any foreseeable expansion of the RUL must be consistent with City and County goals for environmental protection.

Proposed Project Analysis and Conclusion

The project site does not contain, nor is it adjacent to, any designated forest land. No impacts would occur. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

e) Pressures to Convert Farmland or Forest Land

Would the project: Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or conversion of forest land to non-forest use?

Summary of 2020 General Plan FEIR

The Prior FEIR indicated that implementation of the 2020 General Plan would expand the RUL by approximately 440 acres and acknowledged that it would convert more than half of smaller vacant and underutilized parcels used for agricultural and grazing purposes, or those situated on prime agricultural soils to urbanized uses, where conversion of larger parcels with prime agricultural soils may have a significant impact on converting farmland to nonagricultural uses. However, the Prior FEIR states that the conversion of small vacant parcels, generally less than 1 acre in size, within the RUL is considered insignificant on the conversion of prime agricultural soils to urbanized uses, and most of these vacant lands underlain by prime agricultural soils are already located within an urbanized area. In addition, areas that were planned to be incorporated into the RUL are already surrounded by urbanized uses and services and would not indirectly result in secondary development pressures that could convert existing agricultural soils into urbanized uses. Lastly, the Prior FEIR determined that development of smaller vacant parcels with agricultural soils within the RUL would encourage future development within the City, indirectly protecting agricultural and open space lands outside the RUL.²⁴ Therefore, the Prior FEIR concluded that impacts would be less than significant.

²⁴ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Pages 3.2-5 – 3.2-8. December 1.

Proposed Project Analysis and Conclusion

The proposed project does not involve other changes relevant to Farmland conversion that are not already discussed in Impact 4.2(a), and no forest land exists on-site. The proposed project is an infill site entirely surrounded by existing development; as such, it would not remove any barriers or constraints that would result in the conversion of off-site Farmland or forest land. Impacts under this criterion would be less than significant, aside from the proposed project converting Farmland to nonagricultural use. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

Applicable 2020 General Plan FEIR Mitigation Measures

None required.

Conclusion

With regard to Agricultural Resources and Forestry Resources, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. There is no new information of substantial importance, change in the proposed project, or change in the circumstances under which it would be undertaken identifying new significant effects, nor is there a substantial increase in the severity of previously identified impacts. The conclusions from the Prior FEIR remain unchanged when considering the implementation of the proposed project.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.3 Air Quality <i>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.</i> <i>Would the project:</i>					
a) Conflict with or obstruct implementation of the applicable air quality plan?	Less than significant impact	No	No	No	No
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard?	Less than significant impact	No	No	No	No
c) Expose sensitive receptors to substantial pollutant concentrations?	Less than significant impact	No	No	No	No
d) Result in other emissions (such as those leading to odors or) adversely affecting a substantial number of people?	Less than significant impact	No	No	No	No

a) Air Quality Plan Conflict

Would the project: **Conflict with or obstruct implementation of the applicable air quality plan?**

Summary of 2020 General Plan FEIR

The Prior FEIR indicated that impacts related to air quality were based on criteria from the Bay Area Air District contained in the Bay Area Air District CEQA Guidelines – Assessing the Air Quality Impacts of Projects and Plans where Chapter 2 establishes three “tests” on a plan’s consistency, with the most recently adopted regional air quality plan being: (1) the rate of increase in Vehicle Miles Traveled (VMT) associated with the 2020 General Plan is equal to or lower than the rate of increase in population for the City, (2) the 2020 General Plan includes reasonable measures that would

implement Transportation Control Measures (TCMs) in the Clean Air Plan, and (3) the 2020 General Plan establishes buffer zones around existing and proposed land uses that would emit potential odors and/or toxic air contaminants (TACs).

Vehicle Miles Traveled Per Capita

The Prior FEIR indicated that the Association of Bay Area Governments (ABAG) projected the City to increase in population from 72,600 in 1995 to 84,300 in 2010 consisting of an average annual increase of 1.1 percent, while VMT within the City would increase from 1,193,900 VMT in 1992 to 1,567,100 in 2020, resulting in an average annual increase of 1.1 percent. Furthermore, the VMT Analysis prepared for the 2020 General Plan determined that the estimated VMT from the implementation of the 2020 General Plan included traffic that transects through the City on State highways. As such, the Prior FEIR determined that the VMT estimate prepared for the 2020 General Plan was likely lower than the estimated average annual increase. Therefore, the Prior FEIR concluded that the increase in VMT associated with the implementation of the 2020 General Plan would be consistent with the Clean Air Plan.

Implementation of TCMs in the Clean Air Plan

The Prior FEIR identified TCMs that must be included in a City's General Plan to be found consistent with the Clean Air Plan, including implementing policies and measures to improve bicycle access and facilities and arterial traffic management, offering transit use incentives, and incorporating beneficial policies and programs into local planning and development to reduce the number and length of single-occupant automobile trips. The Prior FEIR concluded that the 2020 General Plan would support implementation of the TCMs critical to demonstrating an insignificant air quality impact.

Buffer Residential Development from Odors and Toxic Air Contaminants.

The Prior FEIR acknowledged potential conflicts between existing and proposed land uses with the implementation of the 2020 General Plan pertaining to noxious odors and chemical use, resulting in potential TACs. However, the 2020 General Plan implements an agricultural setback between planned residential uses in proximity to the RUL and agricultural lands and requires that industrial uses be designed to minimize dust and air emissions. As such, the Prior FEIR indicated that the 2020 General Plan satisfies the third test on Clean Air Plan consistency as established by the Bay Area Air District. Therefore, the Prior FEIR concluded that impacts would be less than significant.

Proposed Project Analysis and Conclusion

The Bay Area Air District does not provide a numerical threshold of significance for project-level consistency analysis with Air Quality Plans (AQPs). The Bay Area Air District 2022 CEQA Guidelines state that to evaluate whether a project is consistent with an AQP, all three of the following questions should be answered in the affirmative with substantial evidence provided in support of the answer:²⁵

²⁵ Bay Area Air Quality Management District (Bay Area Air District). 2022. Project-Level Air Quality Impacts. Website: [https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqa-guidelines-chapter-5-](https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqa-guidelines-chapter-5-Consistency-Checklist.docx)

- Criterion 1: Does the project support the primary goals of the AQP?
- Criterion 2: Does the project include applicable control measures from the AQP?
- Criterion 3: Does the project disrupt or hinder the implementation of any AQP control measures?

Criterion 1

The primary goals of the 2017 Clean Air Plan,²⁶ the current AQP to date, are to:

- Attain all State and national air quality standards;
- Eliminate disparities among Bay Area communities in cancer health risk from TACs;
- Protect the climate by reducing Bay Area greenhouse gas (GHG) emissions.

An analysis of the proposed project's consistency with the primary goals of the AQP is discussed below:

- Attain all State and national air quality standards: As mentioned in the Project Description, the proposed project would require all construction equipment to be maintained and tuned to meet appropriate EPA and ARB emission requirements, including the use of only Tier 4 engines in off-road equipment and cleaner heavy-duty trucks to reduce nitrogen oxides (NO_x) and particulate matter (PM) exhaust emission levels. Furthermore, as discussed in Impact AIR (b), the proposed project would have less than significant impacts from construction and operational-related criteria air pollutant emissions. Therefore, the proposed project would be doing its fair share of what is needed from land use development projects to assist the Bay Area Air District in implementing this goal of the AQP.
- Eliminate disparities among Bay Area communities in cancer health risk from toxic air contaminants: As discussed in Impact 4.3(c), the proposed project would not introduce ongoing sources of toxic air contaminants (TACs) or particulate matter emissions. A Health Risk Assessment (HRA) was prepared following Bay Area Air District and OEHHA guidance to assess potential impacts from TAC and PM emissions during construction (Appendix B); the HRA concludes that impacts would be less than significant, and therefore, the proposed project is consistent with this goal of the AQP.
- Protect the climate by reducing Bay Area GHG emissions: As noted in the discussion under Criterion 2, the proposed project would implement a variety of features to reduce GHG emissions and protect the climate, including implementation of green building measures, landscaping, tree planting, and bicycle and pedestrian connections. Therefore, the proposed project is consistent with this goal of the AQP.

project-air-quality-impacts_final-pdf.pdf?rev=de582fe349e545989239cbbc0d62c37a&sc_lang=en. Accessed May 5, 2025.

²⁶ Bay Area Air Quality Management District (Bay Area Air District). 2017. Spare the Air, Cool the Climate. A Blueprint for Clean Air and Climate Protection in the Bay Area. April.

Criterion 2

The 2017 Clean Air Plan contains control measures to reduce air pollutants and GHGs at the local, regional, and global levels. Along with the traditional stationary, area, mobile source, and TCMs, the 2017 Clean Air Plan contains many control measures designed to protect the climate and promote mixed-use, compact development to reduce vehicle emissions and exposure to pollutants from stationary mobile sources.

Table 1 lists the 2017 Clean Air Plan control measures that are applicable and relevant to the proposed project. policies. As shown below, the proposed project would incorporate all applicable AQP control measures.

Table 1: Project Consistency with Applicable Clean Air Plan Control Measures

Control Measure	Project Consistency
Buildings Control Measures	
BL1: Green Buildings	Consistent. The proposed project would comply with the latest energy efficiency standards and incorporate applicable energy efficiency features designed to reduce project energy consumption. For example, the proposed project would include 22 accessory dwelling units (ADUs) constructed within the existing single-family homes; this design feature allows for a more efficient use of building materials on a per dwelling unit basis.
BL4: Urban Heat Island Mitigation	Consistent. Approximately half of the proposed project site is anticipated to include landscaped (pervious) surfaces, which would serve to reduce storm runoff and would include the planting of trees and other vegetation. Hence, the proposed project would be designed to reduce the urban heat island effect.
Energy Control Measures	
EN1: Decarbonize Electricity Generation	Consistent. The project applicant would, at a minimum, be required to conform to the energy efficiency requirements of the California Building Standards Code (CBC), also known as Title 24. The 2022 Title 24 Standards are the current State building regulations, which went into effect on January 1, 2023. Proposed buildings that would receive building permits after January 1, 2023, would be subject to the 2022 Title 24 Standards, including the proposed project. In addition, the project applicant would engage with Pacific Gas and Electric Company (PG&E) to maximize the amount of renewable energy contributing to the production of electricity within the Bay Area, as well as electricity imported into the region.
EN2: Decrease Electricity Demand	

Control Measure	Project Consistency
Natural and Working Lands Control Measures	
NW2: Urban Tree Planting	Consistent. As discussed, approximately 47 percent of the proposed project site would include landscaped and bioretention areas, including tree plantings and groundcover. It is anticipated that the proposed project would plant roughly 60 trees.
Waste Management Control Measures	
WA3: Green Waste Diversion	Consistent. The waste service provider for the proposed project would be required to meet the Assembly Bill (AB) 341, Senate Bill (SB) 939, and SB 1374 requirements that require waste service providers to divert green waste. In addition, AB 1383, which went into effect on January 1, 2022, aims to reduce organic waste disposal by 75 percent by 2025 and to secure 20 percent of surplus edible food for the food insecure by 2025.
WA4: Recycling and Waste Reduction	Consistent. The waste service provider for the proposed project would be required to meet the AB 341, SB 939, and SB 1374 requirements that require recyclable waste to be recycled and removal of 75 percent of the landfill waste stream by 2020.
Stationary Control Measures	
SS36: Particulate Matter from Trackout	Consistent. The proposed project would implement measures to reduce construction fugitive dust and trackout as detailed in Policy Resolution No. 27. Therefore, the proposed project would be consistent with this measure after implementation of Napa Policy Resolution No. 27 to address fugitive dust.
Transportation Control Measures	
TR9: Bicycle and Pedestrian Access and Facilities	Consistent. The proposed project site currently does not contain any sidewalk facilities along El Centro Avenue. Implementation of the proposed project would include the construction of sidewalk facilities along El Centro Avenue, which would help in expanding the City of Napa's sidewalk facilities and connectivity. In addition, the proposed project includes the construction of a new multiuse trail. This would contribute to the Bay Area Air District's efforts to encourage planning for pedestrian and other active transportation facilities.
Source: Bay Area Air Quality Management District (Bay Area Air District). 2017. Final 2017 Clean Air Plan.	

According to the Bay Area Air District guidance contained in the 2022 CEQA Guidelines, projects that incorporate all applicable control measures are considered consistent with the AQP; therefore, the proposed project would be consistent with Criterion 2.

Criterion 3

The proposed project would develop 51 single-family residences, 12 ADUs, and 10 junior ADUs and would not include any feature or design which could disrupt, delay, or otherwise hinder the implementation of any AQP control measure. According to the Bay Area Air District guidance contained in the 2022 CEQA Guidelines, examples of projects that may cause disruption or delay of control measures include projects that preclude an extension of a transit lane or bike path and projects that propose parking beyond parking requirements. The proposed project would not create such conditions. In fact, the project site currently does not contain any sidewalk facilities along El Centro Avenue. Implementation of the proposed project would include the construction of sidewalk facilities along El Centro Avenue, which would help with expanding the City's sidewalk facilities and pedestrian connectivity. The proposed project would also include construction of a new, multiuse trail. This would contribute to the Bay Area Air District's efforts to encourage planning for pedestrians and other active transportation facilities. As shown in Table 1 above, the proposed project would incorporate several AQP control measures as project design features, such as complying with energy efficiency standards contained in the 2022 CBC and expanding pedestrian amenities (the sidewalk along El Centro Avenue). Considering this information, the proposed project would not disrupt or hinder the implementation of any AQP control measures. The proposed project is therefore consistent with Criterion 3.

Summary

As addressed above, the proposed project would be consistent with all three criteria. Thus, the proposed project would not conflict with the 2017 Clean Air Plan. Impacts associated with conflicting with or obstructing implementation of the 2017 Clean Air Plan would be less than significant consistent with the Prior FEIR. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

b) Air Quality Standard, Criteria Pollutants

Would the project: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard?

Summary of 2020 General Plan FEIR

The Prior FEIR determined that the Bay Area Air District manages an air quality monitoring station measuring ozone (O₃), carbon monoxide (CO), nitrogen oxides (NO_x), and particulate matter less than 20 micrometers in diameter (PM₁₀) within the City. The City was in nonattainment for PM₁₀ at the time the Prior FEIR was certified. In addition, the Bay Area Air District, which monitors air quality within the San Francisco Bay Area Air Basin (Air Basin), indicates the Air Basin is in nonattainment for

O₃. As previously mentioned, the Bay Area Air District establishes three “tests” to measure the significance of air quality impacts applicable to general plans, which can be utilized to determine whether a project would violate Ambient Air Quality Standards (AAQS) or contribute to air quality violations. The three “tests” established by the Bay Area Air District include the measure of VMT per capita, the implementation of TCMs in the Clean Air Plan, and the buffering of residential development from odors and TACs. As stated above, the Prior FEIR determined the 2020 General Plan to be consistent with the Clean Air Plan and, therefore, would not violate any air quality standards.²⁷ Therefore, the Prior FEIR concluded that impacts would be less than significant.

Proposed Project Analysis and Conclusion

The proposed project is located in the City of Napa and is within the jurisdiction of the Bay Area Air District, which regulates air quality in the Air Basin. Within the Air Basin, AAQS for O₃, CO, nitrogen dioxide (NO₂), sulfur dioxide (SO₂), particulate matter less than 2.5 microns in diameter (PM_{2.5}), PM₁₀, and lead (Pb) have been established by both the ARB and the EPA due to the serious health impacts related to exposure to those air pollutants.²⁸ The ARB has also set standards for sulfate concentrations and atmospheric visibility.

Exposure to O₃ can cause respiratory issues, aggravate asthma, and reduce lung function, especially in vulnerable populations like children and the elderly. Particulate matter is linked to heart disease, lung cancer, and premature death, as these tiny particles can penetrate deep into the lungs and even enter the bloodstream. CO interferes with oxygen delivery in the body, leading to dizziness, confusion, and, in severe cases, death.²⁹

The EPA and ARB designate air basins, or specific areas within an air basin, as “nonattainment” where AAQS are exceeded. If standards are met, the area is designated as “attainment.” The Air Basin is classified as a “nonattainment” area for the State O₃ and PM standards and as nonattainment for federal O₃ 8-hour and PM_{2.5} 24-hour standards.³⁰ This indicates that the Bay Area Air District has not achieved compliance with these State and federal standards for these pollutants (and their precursors) in the Air Basin. O₃ is not directly emitted and is formed at the ground level as a pollutant through reactions between NO_x and reactive organic gases (ROG) (referred to as O₃ precursor pollutants) in the presence of sunlight. Therefore, NO_x and ROG emissions are evaluated in the analysis below, along with PM₁₀ and PM_{2.5} emissions (because the Air Basin is also in nonattainment for PM pollutants). In addition, CO emissions are of concern during project operation

²⁷ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Pages 3.10-1 – 3.10-5. December 1

²⁸ The United States Environmental Protection Agency (EPA) has established National Ambient Air Quality Standards (NAAQS) for six of the most common air pollutants—carbon monoxide, lead, ground level ozone, particulate matter, nitrogen dioxide, and sulfur dioxide—known as “criteria” air pollutants (or simply “criteria pollutants”).

²⁹ United States Environmental Protection Agency (EPA). 2025. Website: <https://www.epa.gov/clean-air-act-overview/progress-cleaning-air-and-improving-peoples-health>. Accessed May 2, 2025.

³⁰ Bay Area Air Quality Management District (Bay Area Air District). 2017. Website: <https://www.baaqmd.gov/en/about-air-quality/research-and-data/air-quality-standards-and-attainment-status>. Accessed May 7, 2025.

because operational CO hotspots are related to increases in on-road vehicle congestion and CO hotspots can have consequential health impacts.

The significance criteria established or recommended by the Bay Area Air District were used to make CEQA significance determinations related to the proposed project's potential impacts to air quality. The Bay Area Air District has adopted thresholds of significance for project construction and operation. In developing thresholds of significance for air pollutants, the Bay Area Air District considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts on the region's existing air quality conditions.³¹ Therefore, a project that would not exceed the Bay Area Air District thresholds of significance on the project-level also would not be considered to result in a cumulatively considerable contribution to these regional air quality impacts. Construction and operational emissions are discussed separately below.

Construction Emissions

Construction emissions from the proposed project would be "short-term" or temporary in nature and duration. Construction of the proposed project would result in the temporary generation of ROG, NO_x, CO, PM₁₀, and PM_{2.5} emissions from construction activities including demolition, site preparation, grading, building construction, architectural coating, and asphalt paving.

As previously mentioned, fugitive dust (PM₁₀ and PM_{2.5}) would be generated during earthmoving activities but would largely remain localized near the project site.

The Bay Area Air District does not recommend a numerical threshold for fugitive dust particulate matter emissions. Instead, the Bay Area Air District bases the determination of significance for fugitive dust on considering the control measures to be implemented. If all appropriate emissions control measures for fugitive dust are implemented for a project as recommended by the Bay Area Air District, then fugitive dust emissions during construction are not considered significant.³² To reduce potential impacts from fugitive dust to a less than significant level, the proposed project would implement Napa Policy Resolution No. 27, a policy resolution amending standard mitigation measures and conditions of approval for all development projects within the City, which includes best practices for fugitive dust. The best practices for fugitive dust in the Napa Policy Resolution No. 27 are control measures to reduce fugitive dust, and as stated, if control measures for fugitive dust are implemented, then fugitive dust emissions during construction are not considered significant

³¹ Bay Area Air Quality Management District (Bay Area Air District). CEQA Thresholds and Guidelines Update. Website: <https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines>. Accessed: May 2, 2025.

³² Bay Area Air Quality Management District (Bay Area Air District). CEQA Thresholds and Guidelines Update. Website: <https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines>. Accessed July 9, 2025.

(according to Bay Area Air District guidance). Therefore, short-term construction impacts would be less than significant for fugitive dust.

Construction Exhaust Air Pollutant Emissions: ROG, NO_x, PM₁₀ and PM_{2.5}

Construction emissions related to exhaust were quantified and estimated using California Emissions Estimator Model (CalEEMod) Version 2022.1 for a typical construction scenario for a land use project of this size. CalEEMod provides a consistent platform for estimating construction and operational emissions from a wide variety of land use projects and is the model recommended by the Bay Area Air District for estimating project emissions. Construction emissions were estimated and compared with the applicable thresholds of significance established by the Bay Area Air District to assess ROG, NO_x, exhaust PM₁₀, and exhaust PM_{2.5} construction emissions to determine significance for this criterion.

While the proposed project is anticipated to be constructed in 18 to 36 months, project construction was modeled according to CalEEMod default assumptions to occur over an 18-month period to represent the worst-case scenario (because it results in the highest daily emissions). An 18-month construction schedule assumes the same level of construction intensity, horsepower hours, or off-road equipment operation over a shorter period (which would result in higher daily average emissions; however, total emissions would not change). The proposed project is anticipated to be constructed over an 18-to-36-month period. If the construction period is longer than 18 months, there would be no increase in construction equipment operations nor any subsequent emissions; the equipment would operate fewer hours per day, and the construction activity would simply take place over a longer period. The modification of the construction schedule has no effect on the total emissions that would be generated by the proposed project's construction, nor does it have any effect regarding the calculation of average emissions per day or per year (as determined pursuant to Bay Area Air District methodology). Although it does not form the basis of the evaluation or conclusion in this document, the City also notes that it is reasonable to assume that future improvements in technology would be incorporated into regulatory requirements. Accordingly, should the construction schedule move to later years or take longer, construction emissions would be expected to decrease because of mandatory compliance with more stringent regulatory requirements that would affect future construction equipment and fuels (therefore, the analysis represents a worst-case, conservative approach).

The proposed project's construction emissions were calculated in two models: project site and off-site improvements. The project site portion of the construction emissions relates to demolition, site preparation, grading, and construction of the residences, ADUs, and the new interior street. The off-site improvements portion relates to improvements to El Centro Avenue (including widening of the street and construction of curb and gutter and a sidewalk) and construction of a multiuse trail. As shown in Table 2, it has been assumed that the proposed project would be constructed in a total of 400 workdays (project site and off-site improvements are anticipated to occur simultaneously). For a more detailed description of the construction parameters used in estimating air pollutant emissions modeling, please refer to Appendix B.

Table 2: Preliminary Construction Schedule

Construction Activity	Start Date	End Date	Working Days per Week	Total Number of Working Days
Project Site				
Demolition	9/1/2025	9/26/2025	5	20
Site Preparation	9/29/2025	10/10/2025	5	10
Grading	10/13/2025	11/21/2025	5	30
Building Construction	11/24/2025	1/15/2027	5	300
Paving	1/18/2027	2/27/2027	5	20
Architectural Coating	2/15/2027	3/12/2027	5	20
Off-site Improvements				
Demolition	9/1/2025	9/12/2025	5	10
Site Preparation	9/15/2025	9/15/2025	5	1
Grading	9/16/2025	9/17/2025	5	2
Building Construction	9/18/2025	2/4/2026	5	100
Paving	2/5/2026	2/11/2026	5	5
Source: CalEEMod Output Files, Appendix B.				

The calculations of pollutant emissions from the construction equipment account for the type of equipment, horsepower, and load factors of the equipment, along with the duration of use. The modeling assumes the use of Tier 4 (interim or newer) equipment. Refer to Appendix B for more details on proposed project construction modeling. Average daily construction emissions are compared with the Bay Area Air District's significance thresholds in Table 3.

Table 3: Construction Emissions

Construction Activity	Regional Pollutant Emissions (tons/year)			
	ROG	NO _x	PM ₁₀ (Exhaust)	PM _{2.5} (Exhaust)
Demolition (2025)	0.005	0.128	0.002	0.002
Site Preparation (2025)	0.004	0.074	0.000	0.000
Grading (2025)	0.014	0.342	0.003	0.003
Building Construction (2025)	0.006	0.123	0.001	0.001

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CEQA GUIDELINES SECTION 15183 CONSISTENCY CHECKLIST**

Construction Activity	Regional Pollutant Emissions (tons/year)			
	ROG	NO _x	PM ₁₀ (Exhaust)	PM _{2.5} (Exhaust)
Building Construction (2026)	0.055	1.183	0.012	0.011
Building Construction (2027)	0.002	0.049	0.000	0.000
Paving (2027)	0.004	0.072	0.001	0.001
Architectural Coating (2027)	1.816	0.011	0.000	0.000
Off-site Improvements (2025)	0.008	0.197	0.0013	0.001
Off-site Improvements (2026)	0.004	0.064	0.0004	0.0004
Total Emissions (tons)	1.92	2.24	0.02	0.02
Total Emissions (lbs)	3834.0	4486.7	44.5	42.3
Daily Average				
Average Daily Emissions–2025 (Including Off-site Improvements), lbs/day	1.89	40.59	0.37	0.35
Average Daily Emissions–2026 (Including Off-site Improvements), lbs/day	1.92	2.29	0.02	0.02
Average Daily Emissions–2027, lbs/day	50.78	7.78	0.06	0.06
Average Daily Emissions–All Years (lbs/day)	9.59	11.22	0.11	0.11
Significance Threshold (lbs/day)	54	54	82	54
Exceeds Significance Threshold?	No	No	No	No
<p>Notes:</p> <p>lbs = pounds</p> <p>NO_x = oxides of nitrogen</p> <p>PM₁₀ = particulate matter 10 microns in diameter</p> <p>PM_{2.5} = particulate matter 2.5 microns in diameter</p> <p>ROG = reactive organic gases</p> <p>¹ Totals may not add up due to rounding. Calculations use unrounded totals.</p> <p>² Average daily emissions for all years were calculated by dividing the total lbs of emissions by the total number working days of construction (400 workdays). Average daily emissions by year were calculated for each construction year based on the number of working days in that year.</p> <p>³ As stated in the Project Description, the proposed project would require all construction equipment to be maintained and tuned to meet appropriate EPA and ARB emission requirements, including the use of only Tier 4 engines in off-road equipment and cleaner heavy-duty trucks to reduce nitrogen oxides (NO_x) and PM exhaust emission levels. The estimated emissions shown above account for the use of Tier 4 engines in off-road equipment.</p> <p>Source: CalEEMod Output (see Appendix B).</p>				

As shown in Table 3, the construction emissions from all construction activities are below the recommended thresholds of significance; therefore, project construction would have less than significant impact related to emissions of ROG, NO_x, exhaust PM₁₀, and exhaust PM_{2.5}. Therefore, project construction would have a less than significant impact.

Operational Emissions

Operational Air Pollutant Emissions: ROG, NO_x, PM₁₀, and PM_{2.5}

Operational emissions would include area, energy, and mobile sources. Area sources include emissions from architectural coatings, consumer products, and landscape equipment, while energy sources include emissions from the combustion of natural gas for water and space heating. Mobile sources include exhaust and road dust emissions from the vehicles that would travel to and from the project site. Pollutants of concern include ROG, NO_x, PM₁₀, and PM_{2.5}.

Estimated operational emissions reflect the full buildout of the proposed project. The major sources for proposed operational emissions of ROG, NO_x, PM₁₀, and PM_{2.5} include motor vehicle traffic, use of natural gas, and the occasional repainting of buildings. Because of the proposed project's modest proposal of 51 single-family residences, 12 ADUs, and 10 junior ADUs, it would meet the Bay Area Air District's screening criteria for single-family residences, which is a 325-dwelling unit screening size. Nonetheless, operational emissions generated by the proposed project were estimated and are contained in Table 4 for informational purposes.

The average daily and annual emissions are presented in Table 4. Operational emissions of the respective pollutants were calculated using CalEEMod, Version 2022.1.1.22. For detailed assumptions used to estimate emissions, see Appendix B.

Table 4: Operational Emissions

Emissions Source	Criteria Pollutants			
	ROG	NO _x	PM ₁₀ (Total)	PM _{2.5} (Total)
Annual Emissions Summary (tons/year)				
Mobile	0.34	0.27	0.37	0.10
Area	1.21	0.00	0.00	0.00
Energy	0.01	0.10	0.01	0.01
Total Annual Project Emissions (tons/year)	1.56	0.37	0.38	0.10
Thresholds of Significance	10	10	15	10
Exceeds Significance Threshold?	No	No	No	No
Average Daily Emissions Summary (lbs/day)				
Project Emissions (lbs/year)	575.76	184.08	202.68	57.68

Emissions Source	Criteria Pollutants			
	ROG	NO _x	PM ₁₀ (Total)	PM _{2.5} (Total)
Average Daily Project Emissions (lbs/day)¹	8.53	2.03	2.07	0.57
Thresholds of Significance	54	54	82	54
Exceeds Significance Threshold?	No	No	No	No
<p>Notes:</p> <p>lbs = pounds</p> <p>NO_x = nitrogen oxides.</p> <p>PM₁₀ = particulate matter 10 microns or less in diameter</p> <p>PM_{2.5} = particulate matter 2.5 microns or less in diameter</p> <p>ROG = reactive organic gases</p> <p>¹ For average daily emissions, the proposed project is assumed to operate 365 days per year. Therefore, the annual tonnage of emissions is multiplied by 2,000 pounds per ton to identify total pounds of emissions and divided by 365 days per year to identify average daily emissions.</p> <p>Source: CalEEMod Output (see Appendix B).</p>				

As shown in Table 4, the proposed project would not exceed the Bay Area Air District's thresholds of significance during operation, indicating that ongoing project operations would not be considered to have the potential to generate a significant quantity of air pollutants. Therefore, long-term operational impacts associated with criteria pollutant emissions generated by the proposed project would be less than significant.

Operational Carbon Monoxide Hotspot

The CO emissions from traffic generated by the proposed project are a concern at the local level. Congested intersections can result in the potential for high, localized concentrations of CO, known as a CO hotspot.

The Bay Area Air District recommends a screening analysis to determine whether a project has the potential to contribute to a CO hotspot. The screening analysis utilizes three screening criteria, as described below, to identify when site-specific CO dispersion modeling is necessary. The proposed project would result in a less than significant impact to air quality for local CO, and site-specific CO dispersion modeling would not be necessary if all the following screening criteria are met:

- The project is consistent with an applicable Congestion Management Program established by the County congestion management agency for designated roads or highways, regional transportation plan, and local congestion management agency plans; and
- The project traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour; and

- The project traffic 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, below-grade roadway).

According to a Traffic Impact Study prepared by W-Trans, the proposed project is estimated to generate on average 548 daily vehicle trips. Napa Valley Transportation Agency does not have a congestion management program; therefore, the first criteria does not apply to the proposed project. Reasonably, the proposed project would not cause or materially contribute to the second and third screening criteria listed above, which involve intersections with tens of thousands of vehicles per hour. In fact, there are no intersections in the region with traffic counts that exceed criteria two and criteria three traffic volumes. Additionally, a review of adjacent roadways that would receive new vehicle trips generated by the proposed project does not include transportation facilities where vertical or horizontal mixing is substantially limited. Given these considerations, the proposed project would not exceed the second or third criteria. Therefore, the proposed project would not exceed the CO screening criteria and it would have a less than significant impact related to CO. The proposed project does not have any project-specific significant effects which are peculiar to the project or its site, and the proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

c) Sensitive Receptors

Would the project: Expose sensitive receptors to substantial pollutant concentrations?

Summary of 2020 General Plan FEIR

The Prior FEIR addressed the potential impact of pollution concentrations on sensitive receptors by using the Bay Area Air District CEQA Guidelines—Assessing the Air Quality Impacts of Projects and Plans, which establish three “tests” to measure the significance of air quality impacts applicable to the implementation of the 2020 General Plan, including air quality impacts on sensitive receptors. One of the tests from the Bay Area Air District determines whether the 2020 General Plan contains measures that would buffer residential development from sources of potential odors or TACs. The Prior FEIR acknowledged that the potential conflict between existing and proposed land uses under the 2020 General Plan could result in exposure of sensitive receptors to odors and other pollution concentrations, including the emissions of odors and pesticides from agricultural uses in proximity to residential uses and air quality impacts generated from industrial development. However, the Prior FEIR ascertained that the 2020 General Plan would contain policies and implementation measures addressing sensitive receptors, such as Policy LU-3.2, which establishes agricultural setbacks between residential land uses in proximity to the RUL and agricultural land outside the RUL, and Policy LU-7.4, which would require the City to certify that industrial developments minimize dust and

air emissions.³³ As such, the Prior FEIR determined that the implementation of the 2020 General Plan would result in less than significant air quality impacts, including those related to sensitive receptors.

Proposed Project Analysis and Conclusion

The closest existing sensitive receptors are single-family residences located adjacent to the proposed project boundary on all sides. There are also nearby worker receptors and a school. Because of the proximity of the proposed project and these sensitive receptors, the construction emissions have the potential to result in significant health risks due to TAC and/or PM_{2.5} emissions. The major TAC that affects health impacts in the air is diesel particulate matter (DPM), which accounts for roughly 85 percent of the cancer risk from air toxics in the Bay Area region, and it is therefore utilized as the surrogate for TACs in this analysis. DPM has been identified by the ARB as a carcinogenic substance. Major sources of DPM include off-road construction equipment and heavy-duty delivery and vendor trucks and worker activities. For purposes of this analysis, DPM is represented as exhaust emissions of PM₁₀.

PM_{2.5} concentrations were calculated using the PM_{2.5} emission rates for the maximum annual year for PM_{2.5} emissions, including exhaust from off-road equipment, dust from material movement, and on-road mobile sources such as trucks, as well as brake and tire wear and re-entrained road dust.

Accordingly, an HRA was conducted to evaluate potential health risks from TACs and PM_{2.5} during project construction. The assessment is provided below, while Appendix B provides detailed assumptions and modeling parameters.

Health Risk Assessment (HRA)–Project Construction

Consistent with Bay Area Air District guidance, cancer and chronic non-cancer health risks were calculated for off-site residents, off-site workers, and schools within 1,000 feet of the project site. The surrounding area of the project site is residential on all sides. SR-29 is approximately 1,000 feet to the west of the proposed site. One school, Willow Elementary School, is located within 1,000 feet northeast of the proposed project site and was included in the HRA as a sensitive land use. Estimated health risks for all sensitive receptors, including the school, are shown in Table 7.

The Bay Area Air District 2022 CEQA Air Quality Guidelines provide detailed guidance on estimating health risks resulting from exposure to TACs. The methodology used for this HRA is consistent with the Bay Area Air District guidance, which follows the California Environmental Protection Agency (Cal/EPA) OEHHA guidance. Health impacts are calculated by age groups representing the third trimester to birth, infant, child and adult age groups. OEHHA developed age sensitivity factors (ASFs) applied to the different age groups which account for the increased sensitivity to carcinogens during early-in-life exposures. An ASF of 10 is used to multiply the risks for the third trimester and infants less than age 2, an ASF of 3 is applied for ages 2 to 16 years old, and an ASF of 1 for ages 16 and

³³ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Pages 3.10-1 – 3.10-5. December 1

older. The estimated risk for each age group is summed to estimate the potential cancer risk for the exposure duration of interest.

The HARP Risk Assessment Stand-alone Tool (HARP-RAST), a software application designed by ARB to calculate health risks from air pollutant emissions, was used because the DPM air concentrations were calculated directly in the AERMOD dispersion model. This HRA utilizes Tier 2 (user-specified, non-default) HRA procedures utilizing HARP2. HARP2 is the recommended model by Bay Area Air District for calculating and presenting HRA results because it follows the risk assessment guidance methodology and is consistent with the Air District's Regulation 2-5. HARP-RAST allows the user to estimate the single or multi-pathway health impacts at multiple receptor locations from one or more pollutants released from one or more emission points. Appendix B contains additional details of the exposure parameters used in the HRA that determine the inhalation dose and health risks from the project.

The potential health risks from project construction were compared against applicable Bay Area Air District thresholds of significance. The analysis is further described below and results are shown in the Table 7.

Project Construction

Estimation of Construction DPM and PM_{2.5} Emissions

Construction DPM exhaust emissions and PM_{2.5} concentrations were estimated using CalEEMod, Version 2022.1, as described above. Detailed modeling parameters and assumptions can be found in Appendix B. Construction was assumed to begin in September 2025 and conclude in March 2027. Project construction emissions were assumed to be distributed over the project site with a working schedule of 8 hours per day, 5 days per week.

As described in Appendix B, construction emissions were estimated on-site and off-site. The on-site construction emissions include emissions from construction equipment, vehicles, and earthmoving activities within the proposed project construction area, including improvements to El Centro Avenue. The off-site construction emissions are associated with haul road trucks that carry materials to and from the construction areas (modeled within 1,000 feet of the proposed project site).

Table 5 summarizes the emission rates of DPM emissions during construction of the proposed project, including the use of Tier 4 (interim or final) construction equipment as per the Project Description in Section 1.4. The estimated DPM construction emissions are utilized in the air dispersion modeling for purposes of the HRA.

Table 5: Project DPM Construction Emissions

Scenario	On-site DPM (lbs)	Off-site DPM (lbs)	Total DPM (lbs)
Proposed Project (Including Tier 4 Construction Equipment)	42.17	2.3	44.47

Scenario	On-site DPM (lbs)	Off-site DPM (lbs)	Total DPM (lbs)
Notes: DPM = diesel particulate matter lbs = pounds PM _{2.5} = particulate matter less than 2.5 microns in diameter Emissions occur over project construction period of 400 workdays and 3,200 working hours. Emissions Source: CalEEMod Output and Construction Health Risk Assessment Calculations. See Appendix B.			

Table 6 summarizes the annual PM_{2.5} emissions for the maximum annual period (2025–2026) for the construction of the proposed project with a Statewide construction fleet as defined by CalEEMod and with the assumption of a Clean Fleet meeting Tier 4 Off-road Standards. The estimated PM_{2.5} construction emissions are utilized in the air dispersion modeling for purposes of the HRA.

Table 6: Maximum Annual Project PM_{2.5} Construction Emissions

Scenario	On-site PM _{2.5} Area (lbs)	Off-site PM _{2.5} Road Segments (lbs)	Total PM _{2.5} (lbs)
Proposed Project (Including Tier 4 Construction Equipment)	124.22	22.60	146.82
Notes: lbs = pounds PM _{2.5} = particulate matter less than 2.5 microns in diameter Maximum Annual Emissions occur during the first year of construction from 9/2025–9/2026. Emissions are assumed over the first year of construction. Emissions Source: Appendix B			

To assess health impacts to off-site sensitive receptors, the American Meteorological Society/EPA Regulatory Model (AERMOD) air dispersion model was used to simulate the dispersal of the emissions from the DPM and PM_{2.5} project emissions and to estimate the concentrations of these pollutants at sensitive receptors within 1,000 feet of the project site.

The dispersion modeling incorporated release characteristics of the sources and accounted for terrain influence at receptors by using base elevations from USGS digital elevation models. Meteorological data provided by Bay Area Air District from the Air District's Napa County Airport meteorological station from 2013–2017 was used to model the local wind patterns that would influence the dispersion of TACs from the project site and haul road emissions. The prevailing wind is from the southwest.

HRA outputs in Appendix B include local maps showing the proposed project site, locations of sources modeled, and identification of sensitive receptors within 1,000 feet of the site. AERMOD dispersion model reports are also included.

Estimation of Cancer Risks

Cancer risks are estimated as the upper-bound incremental probability that an individual will develop cancer as a direct result of exposure to potential carcinogens over a specified exposure duration. The cancer risk attributed to a chemical is calculated by multiplying the chemical intake or dose at the human exchange boundaries (e.g., lungs) by the chemical-specific cancer potency factor (CPF). The inhalation dose is determined by factors such as the concentration of the pollutant in the air, an individual's breathing rate, and the amount of time they inhale the contaminated air.

A risk level of 10 in 1 million implies a likelihood (or risk) that up to 10 persons, out of 1 million equally exposed people, would contract cancer if exposed continuously (24 hours per day) to the levels of TACs over a specified duration of time. This risk would be an excess cancer risk that is in addition to any environmental cancer risk borne by a person not exposed to these air toxics. It should be noted that the risk of cancer described here is an increased probability of contracting cancer during a lifetime as a result of exposure to toxics from a project. It does not represent an actual incidence of cancer in an exposed population, nor does it equate to deaths from cancer, because not every cancer case results in death. Estimated cancer risks associated with the proposed project's construction are shown in Table 7.

Estimation of Non-cancer Chronic Hazards

Adverse health effects are evaluated by comparing the annual receptor concentration of each chemical compound with the appropriate reference exposure limit. Available reference exposure limits promulgated by the OEHHA and contained within ARB Hot Spots Analysis and Reporting Program (HARP) Version 2 (or HARP2), were utilized in the assessment.

Risk characterization for non-cancer health hazards from TACs is expressed as a Hazard Index (HI). HI is a ratio of the predicted concentration of the proposed project's emissions to a concentration considered acceptable to public health professionals, termed the reference exposure limit. The HI assumes that chronic sub-threshold exposures adversely affect a specific organ or organ system (toxicological endpoint). For each discrete chemical exposure, target organs presented in regulatory guidance were used. Each chemical concentration or dose is divided by the appropriate toxicity reference exposure level to calculate the HI. For compounds affecting the same toxicological endpoint, this ratio is summed up. Where the total equals or exceeds 1, a health hazard is presumed to exist. For purposes of this assessment, the TAC of concern is DPM, for which the OEHHA has defined a reference exposure limit of 5 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$). The principal toxicological endpoint assumed in this assessment was through inhalation.

An HI of 1.0 is the target threshold for assessing non-cancer hazards by project, although a value greater than 1.0 does not necessarily correlate to a statistical probability of harm. Estimated non-cancer chronic hazards associated with the proposed project's construction are shown in Table 7.

Project Construction HRA Summary

Table 7 summarizes the cancer risk and non-cancer chronic HI results for proposed project construction at the Maximally Exposed Individual Resident (MEIR), at a residence located

approximately 25 feet to the east of the proposed project site, as well as at the Maximally Exposed Sensitive Worker (MEIW), and at the nearby school. The cancer risk and non-cancer chronic HI were modeled assuming the use of Tier 4 (interim or final) equipment and, as shown in the table, are below the Bay Area Air District thresholds of significance.

Table 7: Estimated Cancer Risks and Chronic Non-cancer Hazards

Cancer Risk Scenario ¹	Average DPM (µg/m ³)	DPM Cancer Risk (risk per million)	DPM Chronic Non-cancer Hazard Index	Annual PM _{2.5} (µg/m ³)
Maximum Exposed Individual Resident ²	0.02409	5.590	0.0048	0.1004
Maximum Exposed Individual Worker ³	0.00325	0.050	<0.01	0.0135
School Sensitive Receptor ⁴	0.00537	0.710	<0.01	0.0244
Thresholds of Significance		10	1	0.3
Exceeds Individual Source Threshold?		No	No	No
Notes: µg/m ³ = micrograms per cubic meter DPM = diesel particulate matter based in PM ₁₀ Exhaust= particulate matter less than 10 microns in diameter MEIR = Maximally Exposed Individual Receptor PM _{2.5} = particulate matter less than 2.5 microns in diameter (includes PM _{2.5} exhaust, dust, brake wear and tire wear) REL = Reference Exposure Level ¹ The proposed project construction cancer risk and chronic non-cancer hazard estimates shown here are based on a clean construction fleet with a Tier 4 interim engines for equipment >25 horsepower. ² The maximum exposed individual resident was determined for the nearby residences immediately to the east of the project site at 559966 Easting 4243286 Northing, approximately 25 feet from the project site along Moss Lane. ³ The maximum exposed individual off-site worker is located at 559753 Easting, 4243137 Northing ⁴ One school (Willow Elementary School) is located at was located within 1000 feet of the site boundary at 559961 UTM E, 4243443 UTM N Emissions Source: Appendix B. Thresholds Source: Bay Area Air Quality Management District (Bay Area Air District). 2022. CEQA Air Quality Guidelines. April. Website: https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqa-guidelines-chapter-3-thresholds_final_v2-pdf.pdf?la=en . Accessed May 7, 2025.				

Project Operation

The proposed project is a residential project, and any TAC and/or PM_{2.5} emissions would be from traffic generated by the proposed project residents. The proposed project is not associated with other TAC and/or PM_{2.5} generating activities, such as truck traffic, the use of heavy equipment, or stationary sources such as backup diesel generators. As shown in Table 5, the operational emissions would primarily be attributed to residential traffic, which would consist of mostly light-duty gasoline-powered passenger vehicles, which are not a significant source of TAC and air pollutant emissions. Additionally, over time the passenger vehicle fleet is anticipated to become cleaner with the widespread adoption of Zero-Emission Vehicles (ZEVs). Thus, the proposed project would not

generate a significant amount of DPM or other TAC emissions during operation and would not result in significant health impacts to nearby sensitive receptors during operation.

Cumulative Health Risk Assessment

The Bay Area Air District recommends assessing the potential cumulative impacts from sources of TACs within 1,000 feet of a project in combination with the proposed project. As a result, a cumulative HRA was performed that examined the cumulative impacts of the proposed project's construction emissions and existing sources of TAC emissions within 1,000 feet of the proposed project. As previously discussed, the maximally exposed sensitive receptor was determined to be the MEIR, a residence located approximately 25 feet to the east of the proposed project site.

To prepare a cumulative, project-level HRA, the Bay Area Air District provides several tools for use in identifying screening potential sources of TACs nearby a project site and evaluating their potential health risks. These tools include the Stationary Source Screening Map, which provides the location of all the stationary sources permitted by the Air District with cancer risk and non-cancer hazard estimates and shows their location relative to the project site; Roadway Screening Data Layers which provide the location of highways and major surface streets and their estimated cancer risks, non-cancer hazards, and PM_{2.5} concentrations for all Bay Area highways and surface streets relative to a project site; and Rail and Railyard Screening Data Layers which provide the location of rail lines and railyards and their estimated cancer risks, non-cancer hazards, and PM_{2.5} concentrations from diesel locomotives and select railyards relative to a project site.

The Bay Area Air District screening tools were used to identify all sources of TACs and PM_{2.5} concentrations, and associated health risks, from stationary sources, roadway sources and rail lines/railyards within 1,000 feet of the project site. The cumulative health risk during proposed project construction, including health risks from the existing stationary sources, roadway, and rail data derived by using the Bay Area Air District screening tools described above, are summarized in Table 8. No permitted stationary sources were identified within 1,000 feet of the proposed project site. No rail sources were identified within 1,000 feet of the proposed project site, and the Bay Area Air District Railyard Screening Layers contain no data for rail sources at the site. Outputs from the Bay Area Air District screening tools are documented in Appendix B with the HRA Results.

Table 8: Summary of the Cumulative Health Impacts at the MEIR During Construction

Source	Source Name/Type	Distance from MEIR (feet)	Cancer Risk (per million)	Chronic Hazard Index	Maximum Annual PM _{2.5} Concentration (µg/m ³)
Project					
Proposed Project (Including Tier 4 Construction Equipment)	Diesel Construction Equipment	25	5.590	0.0048	0.1004

Source	Source Name/Type	Distance from MEIR (feet)	Cancer Risk (per million)	Chronic Hazard Index	Maximum Annual PM _{2.5} Concentration (µg/m ³)
Existing Roadways					
Existing Roadways		See footnote	10.550	0.025	0.020
Cumulative Health Risks					
Cumulative Total			16.14	0.0298	0.1204
Bay Area Air District Cumulative Thresholds of Significance			100	10	0.8
Threshold Exceedance?			No	No	No
Notes: Roadway cancer risk, chronic/hazard index, and PM _{2.5} are derived from Bay Area Air District screening tools and represent estimated health risks and concentrations at the MEIR.					

As noted in Table 8, the cumulative impacts from mitigated project construction and existing sources of TACs would be less than the Bay Area Air District cumulative thresholds of significance for cancer risk and non-cancer chronic hazard and annual PM_{2.5} concentrations. Therefore, the proposed project, along with cumulative sources of TAC emissions within 1,000 feet, would be below the Bay Area Air District's cumulative thresholds of significance.

The Project as a Receptor–Non-CEQA Impact

The proposed project would locate new sensitive receptors (residents) that could be subject to existing sources of TACs at the project site. However, the California Supreme Court concluded in *California Building Industry Association v. Bay Area Air District* that agencies generally subject to CEQA are not required to analyze the impact of existing environmental conditions on a project's future users or residents. In some instances, it may be appropriate to evaluate impacts of existing surrounding source on a project's future users using the Bay Area Air District risks and hazards thresholds for guidance.

In any event, new project planning should pay special attention to the siting of new sensitive receptors near existing sources or air pollution to safeguard the health and safety of the residents. The latest CBC update from 2022 requires heating, ventilation, and air conditioning (HVAC) systems with Minimum Efficiency Reporting Values (MERV)-13 or better filtration in newly constructed single-family homes which serves to effectively mitigate the impacts of particulate TACs and PM_{2.5} for indoor exposure.

To determine the necessity of measures beyond those already required for the proposed project through compliance with regulations, the Bay Area Air District screening analysis was applied at the project site to evaluate whether existing TACs that could adversely affect individuals living within the

proposed project. The Bay Area Air District-provided tools for screening potential sources of TACs were used for this purpose.

Table 9 summarizes the cumulative health impacts at the project site at project buildout. The table summarizes the risk based on outdoor air concentration, also accounting for MERV-13 filters, assuming an overall reduction of 80 percent for particulate matter. The table shows that the risks and hazards for new residents at the proposed project site would be below both the single source project threshold of 10 in 1 million and the cumulative threshold of 100 in 1 million.

Table 9: Summary of the Cumulative Health Impacts at the Proposed Project Site

Source Name/Type	Distance from Project Site ¹ (feet)	Cancer Risk (per million)	Chronic Hazard Index	Maximum Annual PM _{2.5} Concentration (µg/m ³)
Existing Roadways				
Existing Roadways	See footnote	13.00	0.030	0.224
Cumulative Health Risks				
Cumulative Total (outdoor air)		13.0	0.030	0.224
Cumulative Total with MERV filters		2.60	0.006	0.045
BAAQD Single Source Thresholds of Significance		10	1	0.3
Bay Area Air District Cumulative Thresholds of Significance		100	10	0.8
Threshold Exceedance?		No	No	No
Notes: ¹ µg/m = micrograms per cubic meter Bay Area Air District = Bay Area Air Quality Management District PM _{2.5} = particulate matter less than 2.5 microns in diameter Conclusions assume emissions remain constant with time. The nearest contributing roadway with high traffic values is Saint Helena Highway (SR-29) located approximately 1,145 feet west of the project site. Greatest value for cancer risk, chronic hazard index and annual PM _{2.5} concentrations on-site was found at coordinates 559810 UTM E, 4243266 UTM N on the southern side of the proposed site. Source: Appendix B.				

As shown in Table 9, the cumulative health impacts to the future on-site residents from existing TAC emission sources located within 1,000 feet of the project site are below Bay Area Air District's cumulative significance thresholds for cancer risk, chronic hazards, and annual PM_{2.5} concentrations. As such, the proposed project would result in a less than significant cumulative health impact related to exposing sensitive receptors to substantial concentrations of pollutants. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its

site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

d) Odors

Would the project: Result in other emissions (such as those leading to odors or) adversely affecting a substantial number of people?

Summary of 2020 General Plan FEIR

The Prior FEIR did not directly determine significant environmental impacts pertaining to objectionable odors. However, the Prior FEIR discerned that the 2020 General Plan would have a less than significant impact on air quality impacts if it established buffer zones around land uses that would emit odors or TACs following criteria adopted by the Bay Area Air District. As previously mentioned, the Prior FEIR recognized that potential conflicts could arise between agricultural and residential land uses, along with industrial developments, with the implementation of the 2020 General Plan, resulting in exposing residential uses to odors and other nuisances. However, Policy LU-3.2 of the 2020 General Plan would require agricultural setbacks between residential land uses and agricultural land along the RUL, and Policy LU-7.4 would require the City to ensure industrial development to minimize air emissions and other nuisances, including objectionable odors. As such, the Prior FEIR determined that implementation of the 2020 General Plan would satisfy the Bay Area Air District criteria pertaining to establishing buffer zones around land uses that would generate odors and TAC and, thus, would result in a less than significant impact related to other emissions, such as odors.³⁴

Proposed Project Analysis and Conclusion

According to Bay Area Air District 2022 CEQA Guidelines, odor impacts could occur if the proposed project introduces a new odor source near existing receptors. The presence of odor impacts is dependent on several variables, including the nature of the odor source (e.g., wastewater treatment plant, food processing plant), frequency of the odor, intensity of the odor, distance of the odor to sensitive receptors, wind direction, and sensitivity of the receptor. Residential homes are not odor-generating land uses.

Construction-related Odors

Potential sources that may emit odors during construction activities include exhaust from diesel construction equipment. However, because of the temporary nature of these emissions, the intermittent nature of construction activities, the distance from project construction and nearby receptors, and the highly diffusive properties of diesel PM exhaust, nearby receptors would not be affected by diesel exhaust odors associated with project construction. Odors from these sources would be localized and generally confined to the immediate area surrounding the project site. The

³⁴ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Pages 3.10-1 – 3.10-5. December 1

proposed project would utilize typical construction techniques, and the odors would be typical of most construction sites and temporary in nature.

Operation-related Odors

The proposed project would construct 51 new single-family houses and 12 ADUs whose operations could lead to odors from associated residential laundry cleaning, vehicle exhaust, outdoor cooking, and waste disposal. However, such odors generated by project operation would be small in quantity and duration and would not pose an objectionable odor impact to future and existing receptors.

To summarize, the proposed project would not generate any peculiar emissions nor odors that adversely affect a substantial number of people. This impact would be less than significant. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

Applicable 2020 General Plan FEIR Mitigation Measures

None required.

Conclusion

With regard to Air Quality, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. There is no new information of substantial importance, change in the proposed project, or change in the circumstances under which it would be undertaken identifying new significant effects, nor is there a substantial increase in the severity of previously identified impacts. The conclusions from the Prior FEIR remain unchanged when considering the implementation of the proposed project.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.4 Biological Resources					
Would the project:					
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service?	Significant and unavoidable impact				
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service?	Less than significant impact				
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?	Less than significant impact				
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 wildlife nursery sites?	Less than significant impact				

ZINFANDEL SUBDIVISION PROJECT
CEQA GUIDELINES SECTION 15183 CONSISTENCY CHECKLIST

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Less than significant impact				
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?	Not Applicable				

Preliminary review of the proposed project identified effects related to species that are peculiar to the project site. Accordingly, pursuant to the CEQA Guidelines Section 15183(b) mandate that additional environmental review be limited to only those issues that are peculiar to the project or parcel, potential impacts related to Biological Resources will be evaluated under separate cover to identify any potential impacts along with any available mitigation.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.5 Cultural and Tribal Cultural Resources					
Would the project:					
a) Cause a substantial adverse change in the significance of a historical resource as pursuant to Section 15064.5?	Less than significant impact	No	No	No	No
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	Less than significant impact	No	No	No	No
c) Disturb any human remains, including those interred outside of formal cemeteries?	Not Applicable	No	No	No	No
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:					
d) 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	Not Applicable	No	No	No	No
e) 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.	Not Applicable	No	No	No	No

a) Historical Resources

Would the project: Cause a substantial adverse change in the significance of a historical resource as pursuant to Section 15064.5?

Summary of 2020 General Plan FEIR

The Prior FEIR indicated that the City has an active preservation program with policies and laws designed to protect and enhance historical structures and archaeological sites within the City. The City developed its survey districts in the 1970s, resulting in the inclusion of 31 properties into the National Register of Historic Places (NRHP), one State of California Historic Landmark, and 26 properties given a local landmark designation by the City. Additionally, the Prior FEIR acknowledged that implementation of the 2020 General Plan could result in infill development within unknown locations in the City, making impacts on historical structures unknown. However, the Prior FEIR claimed that the 2020 General Plan contains a variety of policies and implementation programs within Chapter 6, Historic Resources, which would assist in preserving and protecting historical structures from new development, identify structures and other historical resources eligible for preservation, and provide strategies through programs, alternatives, and incentives to assist in the preservation of historic structures or sites. Furthermore, the Land Use Element of the 2020 General Plan establishes policies for the preservation of historic neighborhoods and districts and to ensure future infill development is consistent with the relationships and patterns of the surrounding historical neighborhoods. Therefore, the General Plan 2020 FEIR concluded that implementation of the 2020 General Plan would result in less than significant impacts to historical resources within the City.³⁵

Proposed Project Analysis and Conclusion

Section 15064.5 of the CEQA Guidelines defines a historical resource as (1) a resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (CRHR); (2) a resource listed in a local register of historical resources or identified as significant in a historical resource survey meeting certain State guidelines; or (3) an object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record.

On May 13, 2020, and February 15, 2024 (update), FirstCarbon Solutions (FCS) sent a records search request to the Northwest Information Center (NWIC) located in Rohnert Park. The records search focused on an approximately 0.5-mile radius surrounding the project site. To identify any historic properties on or near the site, current inventories of the NRHP, the CRHR, the California Historical Landmarks (CHL) list, the California Points of Historical Interest (CPHI) list, and the California Built Environment Research Directory (BERD) for Napa County were also reviewed to determine the presence of previously documented local historical and archaeological resources.

³⁵ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Pages 3.5-3 – 3.5-4. December 1

The results of the record searches indicate there are two recorded historic era resources (P-28-000966 (Railroad bed) and P-28-001547 (Napa Valley Railroad)) within the 0.5-mile search radius of the project site, none of which are within the project boundaries. Each of these resources is associated with railroad infrastructure located outside of the project site and would remain unaffected by the proposed project. In addition, seven area-specific survey reports (S-13577, S-21260, S-21631, S-24577, S-32235, S-38960, S-44293) are on file with the NWIC within a 0.5-mile search radius of the project site. None of the survey reports address the proposed project site, indicating that the project site has not been previously surveyed for cultural resources.

A pedestrian survey of the project site on June 16, 2020, encountered one structure that is over 45 years in age and had not been evaluated for historic significance and possible listing on the CRHR or NRHP. Further evaluation of the building (1583 El Centro Avenue) indicates that it does not qualify as a historical resource under the CRHR, NRHP, or local register resulting from its lack of important historical associations and architectural merit (Confidential Appendix C, California Department of Parks and Recreation [DPR] Form). However, consistent with Napa Municipal Code 15.52.080, the demolition of a building greater than 45 years old and not listed on the Historic Preservation Inventory shall require a historic clearance prior to issuance of a demolition permit.

While unlikely, subsurface construction activities always have potential to damage or destroy previously undiscovered historic resources. Historic resources can include wood, stone, foundation, and other structural remains; debris-filled wells or privies; and deposits of wood, glass, ceramics, and other refuse. Implementation of IM CUL-1, IM CUL-2, and IM CUL-3 pursuant to 2020 General Plan Policies HR-6.1 and HR-6.2 would ensure that this potential impact is reduced to a less than significant level. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

b) Archaeological Resources

Would the project: Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Summary of 2020 General Plan FEIR

The Prior FEIR indicated that future development within the City from the implementation of the 2020 General Plan could uncover archaeological and prehistoric sites, including those from Native American Tribes that inhabited the region based on previous studies conducted in the area. Since ground-disturbing activities would likely be conducted during construction for future developments from the implementation of the 2020 General Plan, the Prior FEIR concluded that development could result in the disturbance to significant subsurface historical and archaeological resources. However, the Prior FEIR determined that the 2020 General Plan contains policies addressing the damaging of any archaeological resources which are consistent with the Office of Historic Preservation (OHP) on mitigating impacts from future development. Furthermore, Policies HR-6.1 through HR-6.2 require investigations to identify and protect prehistoric sites and resources, including for proposed

developments planned in identified archaeologically sensitive areas. Although the 2020 General Plan contains policies and implementation programs intended to reduce impacts to uncovering significant archaeological resources, implementation of the 2020 General Plan could still uncover and disturb significant archaeological resources from ground disturbance initiated by future developments. As such, future development would be required to comply with standard mitigation requirements detailed in Napa Policy Resolution No. 27. These require that if any archaeological materials or objects are unearthed during project construction, all work in the vicinity shall be immediately halted until a qualified Archeologist is retained by the City to evaluate the finds. The proposed project developer shall comply with all mitigation recommendations of the Archaeologist prior to commencing work in the vicinity of the archaeological finds. Therefore, the Prior FEIR concluded that impacts would be less than significant.³⁶

Proposed Project Analysis and Conclusion

Section 15064.5 of the CEQA Guidelines defines significant archaeological resources as resources that meet the criteria for historical resources, as discussed above, or resources that constitute unique archaeological resources. A project-related significant adverse effect could occur if a project were to affect archaeological resources that fall under either of these categories.

Record search results from the NWIC indicate there are two recorded historic era resources (P-28-000966 (Railroad bed) and P-28-001547 (Napa Valley Railroad)) within the 0.5-mile search radius of the project site, none of which are within the project boundaries. Neither are archaeological in nature. A thorough pedestrian survey of the site and surroundings failed to identify archaeological resources or raw materials traditionally utilized in the production of those resources.

In addition to the pedestrian survey, the potential for unidentified cultural resources to exist in the project vicinity was reviewed against geologic, topographic, and Geographic Information System (GIS) data for the general area and information from other nearby projects. The proposed project was evaluated against a set of criteria identified by a geoarchaeological overview of the Central Valley that was prepared for Caltrans District 4. This study mapped the “archaeological sensitivity,” or potential to support the presence of buried pre-contact archaeological deposits, throughout the Central Valley based on geology and environmental parameters, including distance to water and landform slope. The methodology used in the study is applicable to other parts of California and concluded that sites consisting of flat, Holocene-era deposits in close proximity to water resources have a moderate to high probability of containing subsurface archaeological deposits when compared to earlier Pleistocene deposits situated on slopes or further away from drainages, lakes, and rivers.

The project site is situated on relatively flat land and in close proximity to Salvador Channel, which runs east–west across the southern portion of the project boundary. According to the DOC geological survey map, the surface of the project site is situated entirely on Pleistocene deposits consisting of alluvium, lake, playa, and terrace deposits. The project site’s proximity to Salvador Channel, its

³⁶ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Page 3.5-1. December 1

relatively flat terrain, and proximity to historic resources within a 0.5-mile radius suggests a moderate potential for unanticipated buried cultural resources to be impacted by project construction.

While the pedestrian survey data and disturbed nature of the site indicate a low to moderate likelihood of encountering archaeological resources during project construction, subsurface construction activities always have potential to damage or destroy previously undiscovered archaeological resources. Archaeological resources could consist of, but are not limited to, stone, bone, wood, or shell artifacts or features, including hearths and structural elements. Damage or destruction of these resources would be a potentially significant impact. Consistent with the 2020 General Plan Policies HR-6.1 and HR-6.2, implementation of IM CUL-1, IM CUL-2, and IM CUL-3, which require archaeological monitoring, as well as archaeological and TCR training for staff, and contingencies in the event of a cultural resource discovery, would ensure that this potential impact is reduced to a less than significant level. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

c) Human Remains

Would the project: Disturb any human remains, including those interred outside of formal cemeteries?

Summary of 2020 General Plan FEIR

The Prior FEIR did not directly address impacts related to disturbing human remains. However, the Prior FEIR claimed that the 2020 General Plan would continue to enforce Napa Policy Resolution No. 27, which supplements the California Code of Regulations Section 15064.5(e) on procedures to be taken on the accidental discovery of human remains, including ceasing all construction activity until proper examination is conducted by a qualified professional Archaeologist and providing appropriate methods for reburial to prevent future subsurface disturbance that could impact the remains. Therefore, the Prior FEIR concluded that impacts would be less than significant.

Proposed Project Analysis and Conclusion

The results of the NWIC record search results indicate that there are no known historic or prehistoric resources in the project site. No human remains or cemeteries are known to exist within or near the project site. However, there is always the possibility that subsurface construction activities associated with the proposed project, such as trenching and grading, could potentially damage or destroy previously undiscovered human remains. This would be a potentially significant impact. In the event of accidental discovery or recognition of any human remains, CEQA Guidelines Section 15064.5, Health and Safety Code Section 7050.5, and Public Resources Code Section 5097.94 and Section 5097.98 must be followed. In the unlikely event human remains are discovered, consistent with 2020 General Plan Policy HR-6.3 and Napa Policy Resolution No. 27, implementation of IM CUL-4, which provides contingencies in the event human remains are discovered, would reduce this potential impact to a less than significant level. Therefore, the proposed project does not have any project-

specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

d) Listed or Eligible Tribal Cultural Resources

Would the project: Cause a substantial adverse change in the significance of a Tribal Cultural Resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is 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)?

Summary of 2020 General Plan FEIR

This checklist question was not included in the Prior FEIR. However, the Prior FEIR addressed potential impacts to Tribal Cultural Resources (TCRs), acknowledging that prehistoric sites from Native Americans could be present in the region based on previous studies. As such, policies identified in the 2020 General Plan to preserve and protect prehistoric resources apply to TCRs, including Policy HR-6.1, under which the City would enforce current federal and State procedures to identify, preserve, and protect prehistoric sites. In addition, Napa Policy Resolution No. 27, which follows procedures from California Code of Regulations Section 15064.5(e) on the accidental discovery of human remains, also would apply to TCRs if the County Coroner were to identify human remains to be Native American. The Coroner would then contact the Native American Heritage Commission (NAHC) to determine the Most Likely Descendant (MLD) for recommendations to appropriately treat and dispose of those human remains. Since future development from the implementation of the 2020 General Plan would involve ground disturbance, the Prior FEIR concluded that disturbance to subsurface historical resources and archaeological sites, including those from Native American Tribes, would have a potentially significant impact. However, future development would be required to abide by federal and State procedures protecting archaeological resources, including TCRs. Therefore, the Prior FEIR concluded that impacts would be less than significant.

Proposed Project Analysis and Conclusion

A review of the CRHR, local registers of historic resources, and the NWIC records search results failed to identify any previously listed TCRs that may be adversely affected by the proposed project. The NAHC Sacred Lands File (SLF) search also produced a negative result for the presence of Native American cultural resources within the project site. The NAHC included a list of 12 Tribal representatives available for consultation. To ensure that all Native American knowledge and concerns over potential TCRs that may be affected by the proposed project are addressed, a letter containing project information was sent by FCS to each Tribal representative on May 9, 2024. No responses to the FCS letter have been received to date.

On April 24, 2024, the City of Napa sent out Tribal consultation letters pursuant to AB 52 to identify additional significant TCRs meeting the criteria set forth in subdivision (c) of the Public Resources Code Section 5024.1. Tribes have 30 days to respond and request consultation. On April 30, 2024, a letter from the Confederated Villages of Lisjan Nation was received, requesting a copy of the CEQA documentation for the proposed project, Phase I Cultural Resources Assessment (Phase I CRA), the California Historical Resources Information System (CHRIS) results, and the SLF records search from the NAHC. The City provided the Confederated Villages of Lisjan Nation with the Phase I CRA, the CHRIS results, and the SLF records search results from the NAHC on July 10, 2024. The Tribe responded on July 10, 2024, stating that they will defer to any other Tribal Nations affiliated with the area. No additional AB 52 responses have been received to date.

Should any undiscovered TCRs be encountered during project construction, implementation of IM CUL-1, IM CUL-2, IM CUL-3, and IM CUL-4, which address archaeological and TCR training for construction personnel, archaeological monitoring, and inadvertent discovery of cultural resources and human remains, pursuant to 2020 General Plan Policies HR-6.1, HR-6.2, and HR-6.3, would reduce potential impacts on TCRs to a less than significant level. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

e) Lead Agency Determined Tribal Cultural Resources

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

Summary of 2020 General Plan FEIR

This checklist question was not included in the Prior FEIR. As previously mentioned, the Prior FEIR did acknowledge prehistoric sites from Native American Tribes to encompass the region where future development from the implementation of the 2020 General Plan could unearth subsurface historical structures and archaeological sites, including sites from Native American Tribes. However, policies from the 2020 General Plan, such as Policy HR-6.1 and Policy HR-6.2, would enforce current federal and State procedures to identify, preserve, and protect prehistoric sites, which applies to those identified to be associated with Native American Tribes, and to conduct investigations for proposed developments encompassing archaeologically sensitive areas. Furthermore, Napa Policy Resolution No. 27, which supports California Code of Regulations Section 15064.5(e) on the accidental discovery of human remains, also protects TCRs through consultation with the NAHC to determine the MLD if the human remains are identified by the County Coroner to be Native American. The MLD

would then provide recommendations for proper treatment and disposal of those remains. Although ground-disturbing activities could result in the disturbance to prehistoric sites, including those from Native American Tribes, the policies identified in the 2020 General Plan would be enforced for future projects from the implementation of the 2020 General Plan. Therefore, the Prior FEIR concluded that impacts would be less than significant.

Proposed Project Analysis and Conclusion

A review of the CRHR, local registers of historic resources, and the NWIC records search results failed to identify any previously listed TCRs that may be adversely affected by the proposed project. The NAHC SLF search produced a negative result for the presence of Native American cultural resources within the project site. The NAHC included a list of 12 Tribal representatives available for consultation. To ensure that all Native American knowledge and concerns over potential TCRs that may be affected by the proposed project are addressed, a letter containing project information was sent to each Tribal representative on May 9, 2024. No responses have been received to date. A copy of the NAHC record searches and Native American Tribal correspondences can be found in Appendix C.

However, on April 24, 2024, the City of Napa sent out Tribal consultation letters pursuant to AB 52 to identify additional significant TCRs meeting the criteria set forth in subdivision (c) of the Public Resources Code Section 5024.1. Tribes have 30 days to respond and request consultation. On April 30, 2024, a letter from the Lisjan Nation was received, requesting a copy of the CEQA documentation for the proposed project, Phase I CRA, the CHRIS report, and the SLF records search from the NAHC. The Tribe responded on July 10, 2024, stating that they will defer to any other Tribal Nations affiliated with the area. No additional AB 52 responses have been received to date.

Should any undiscovered TCRs be encountered during project construction, implementation of IM CUL-1, IM CUL-2, IM CUL-3, and IM CUL-4, which address archaeological and TCR training for construction personnel, archaeological monitoring, and inadvertent discovery of cultural resources and human remains, pursuant to 2020 General Plan Policies HR-6.1, HR-6.2, and HR-6.3, would reduce potential impacts on TCRs to a less than significant level. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

Applicable 2020 General Plan FEIR Mitigation Measures

None required.

Project-specific Implementation Measures

In order to fully comply with 2020 General Plan Policies HR-6.1, HR-6.2, and HR-6.3, the proposed project would be required to implement the following Implementation Measures (IMs):

IM CUL-1 Archaeological and Tribal Cultural Resources Training for Construction Staff

An Archaeologist who meets the Secretary of the Interior's qualification standards for archaeology shall attend the pre-construction meeting with the contractors to provide Worker Environmental Awareness Program (WEAP) training for all construction personnel who will be engaging in ground-disturbing activities. The training shall include a brief review of the cultural sensitivity of the proposed project and the surrounding area; what resources could potentially be identified during earthmoving activities, along with visual aids/appropriate examples of those resources; applicable federal, State, and local statutes governing the protection of archaeological resources; and the protocols that apply in the event unanticipated cultural resources are identified, including who to contact and appropriate avoidance measures until the find(s) can be properly assessed. A sign-in sheet shall be circulated and returned to the Lead Agency as confirmation the training has taken place.

IM CUL-2 Archaeological Monitoring

An Archaeological Monitor reporting to the qualified Archaeologist shall be present to monitor during the clearing, grubbing, trenching, and grading phases of project-related ground disturbance to check for inadvertent exposure of archaeological resources or human remains. Over the course of the proposed project, should the Archaeologist determine that the probability of inadvertent discovery is low, they may make a recommendation to the Lead Agency that monitoring be reduced to regular periodic or "spot-check" monitoring, or that monitoring may cease altogether.

IM CUL-3 Inadvertent Discovery of Cultural Resources

In the event that buried cultural resources are discovered during construction, operations shall stop within a 100-foot radius of the find and a qualified Archaeologist shall be consulted to determine whether the resource requires further study. The qualified Archaeologist shall make recommendations to the Lead Agency on the measures that shall be implemented to protect the discovered resources, including but not limited to excavation of the finds and evaluation of the finds in accordance with Section 15064.5 of the CEQA Guidelines. Potentially significant cultural resources consist of, but are not limited to, stone, bone, fossils, wood, or shell artifacts or features, including hearths, structural remains, or historic dumpsites. Any previously undiscovered resources found during construction within the project site shall be recorded on appropriate California Department of Parks and Recreation (DPR) forms and evaluated for significance in terms of CEQA Guidelines.

If the resources are determined to be unique historic resources as defined under Section 15064.5 of the CEQA Guidelines, mitigation measures shall be identified by the monitor and recommended to the lead agency. Appropriate mitigation measures

for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds.

No further grading shall occur in the area of the discovery until the Lead Agency approves the measures to protect these resources. Any archaeological artifacts recovered as a result of mitigation shall be donated to a qualified scientific institution approved by the Lead Agency where they would be afforded long-term preservation to allow future scientific study.

IM CUL-4 Inadvertent Discovery of Human Remains

In the event of the accidental discovery or recognition of any human remains, CEQA Guidelines Section 15064.5; Health and Safety Code Section 7050.5; and Public Resources Code Section 5097.94 and Section 5097.98 must be followed. If during project development there is accidental discovery or recognition of any human remains, the following steps shall be taken:

1. There shall be no further excavation or disturbance of the site where human remains are discovered and/or any nearby area reasonably suspected to overlie adjacent human remains until the Napa County Coroner is contacted to determine whether the remains are Native American and if an investigation of the cause of death is required. If the Coroner determines the remains to be Native American, the Coroner shall contact the Native American Heritage Commission (NAHC) within 24 hours, and the NAHC shall identify the person or persons it believes to be the Most Likely Descendant (MLD) of the deceased Native American. The MLD may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98.
2. Where the following conditions occur, the landowner or his or her authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity either in accordance with the recommendations of the MLD or on the project area in a location not subject to further subsurface disturbance.
 - The NAHC is unable to identify MLD or the MLD failed to make a recommendation within 48 hours after being notified by the Commission;
 - The descendant identified fails to make a recommendation; or
 - The landowner or his or her authorized representative rejects the recommendation of the descendant, and mediation by the NAHC fails to provide measures acceptable to the landowner.

Additionally, California Public Resources Code Section 15064.5 requires the following relative to Native American remains.

- When an initial study identifies the existence of, or the probable likelihood of, Native American remains within a project, a lead agency shall work with the appropriate Native Americans as identified by the NAHC as provided in Public Resources Code Section 5097.98. The applicant may develop a plan for treating or disposing of, with appropriate dignity, the human remains and any items associated with Native American burials with the appropriate Native Americans as identified by the NAHC.

Conclusion

With regard to Cultural Resources and TCRs, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. There is no new information of substantial importance, change in the proposed project, or change in the circumstances under which it would be undertaken identifying new significant effects, nor is there a substantial increase in the severity of previously identified impacts. The conclusions from the Prior FEIR remain unchanged when considering the implementation of the proposed project.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.6 Energy					
Would the project:					
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	Less than significant impact	No	No	No	No
b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?	Not Applicable	No	No	No	No

a) Energy Use

Would the project: Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Summary of 2020 General Plan FEIR

The Prior FEIR indicated that new development from the implementation of the 2020 General Plan would increase the use of nonrenewable resources, including the consumption of a certain amount of fossil fuel resources throughout operation of new development, which could result in wasteful, inefficient, or unnecessary energy consumption. Although these changes in the Prior FEIR are considered significant irreversible environmental changes, the General Plan FEIR determined that with policies and implementation programs addressed in the 2020 General Plan, such as Policy NR-5.1 and Policy NR-5.2, which encourage future developments to construct infrastructure advocating alternative modes of transportation, along with implementing land use patterns and management practices intended to conserve air and energy sources, the changes would not result in the substantial increase in energy consumption. In addition, the Prior FEIR highlighted that future development would be required to abide by Napa Policy Resolution No. 27, which mandates construction and operation of a development project to incorporate energy conservation measures. Furthermore, the Prior FEIR emphasized that the majority of future development from the implementation of the 2020 General Plan would occur within the existing RUL and would connect to already established utility lines. Additionally, those areas to be incorporated into the RUL would not

require the construction of major infrastructure facilities and, therefore, would not require a substantial increase in energy consumption. As such, the Prior FEIR concluded that development associated with the implementation of the 2020 General Plan would not substantially increase overall per capita energy consumption, reliance of natural gas and oil, or increase local and regional energy supplies.³⁷ Therefore, the Prior FEIR concluded that the 2020 General Plan would result in less than significant impacts related to the wasteful, inefficient, or unnecessary consumption of energy resources.

Proposed Project Analysis and Conclusion

A discussion of the proposed project's anticipated energy usage is presented below. Energy use consumed by the proposed project was estimated and includes natural gas, electricity, and fuel consumption for project construction and operation. Energy calculations are included as part of Appendix B.

Construction Impacts

The project construction schedule was assumed to begin in September 2025. It is anticipated that construction would require approximately 18 months of activities; however, it is possible that the actual schedule may last up to 36 months, though this would not result in any additional workdays. If the construction schedule moves to later years, construction emissions would be expected to decrease because of improvements in technology and more stringent regulatory requirements as older, less efficient equipment is replaced by newer and cleaner equipment. Therefore, the modeling and analysis represents a conservative, worst-case scenario. The proposed project would require demolition, site preparation, grading, building construction, architectural coating, and paving. The construction phase would require energy for the manufacture and transportation of building, roadway, sidewalk and multiuse trail materials, preparation of the site (e.g., demolition, site clearing, and grading), and the actual construction of the buildings, interior road, sidewalk (including curb and gutter) and multiuse trail. Petroleum-based fuels such as diesel fuel and gasoline would be the primary sources of energy for these tasks.

The types of on-site equipment used during construction of the proposed project could include gasoline- and diesel-powered construction and transportation equipment, including trucks, bulldozers, front-end loaders, forklifts, and cranes. Construction equipment is estimated to consume a total of 56,002 gallons of diesel fuel over the entire construction duration (Appendix B).

Fuel use associated with construction vehicle trips generated by the proposed project was also estimated; trips include construction worker trips, haul truck trips for material transport, and vendor trips for construction material deliveries. Fuel use from these vehicles traveling to the project site was based on (1) the projected number of trips the proposed project would generate during construction, (2) average trip distances by trip type, and (3) fuel efficiencies estimated in the ARB Emission Factors Mobile Source Emissions Model (EMFAC). The specific parameters used to estimate fuel usage are included in Appendix B. In total, the proposed project is estimated to generate 112,121

³⁷ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Page 3.4-16 — 3.4-17. December 1

VMT and utilize a combined 10,787 gallons of gasoline and diesel for vehicle travel during construction.

Other equipment could include construction lighting, field services (office trailers), and electrically driven equipment such as pumps and other tools. Napa Municipal Code Section 8.08.025 defines permissible hours of construction as between the hours of 7:00 a.m. and 7:00 p.m. Monday through Friday.³⁸ As on-site construction activities would be restricted to these hours, it is anticipated that the use of construction lighting would be minimal. Single-wide mobile office trailers, which are commonly used in construction staging areas, generally range in size from 160 square feet to 720 square feet.

The overall construction schedule and process is already designed to be efficient to avoid excess monetary costs. For example, equipment and fuel are not typically used wastefully due to the added expense associated with renting the equipment, maintaining it, and fueling it. Therefore, the opportunities for future efficiency gains during construction are limited. As such, it is anticipated that the construction phase of the proposed project would not result in wasteful, inefficient, and unnecessary consumption of energy. Construction-related energy impacts would be less than significant.

Operational Impacts

The proposed project would consume energy as part of building operations and transportation activities. PG&E provides electric and natural gas services to the City of Napa with four electric substations and two major gas systems and would be the energy provider for the proposed project. Operation of the proposed project would consume an estimated 399,624 kilowatt-hours (kWh) of electricity on an annual basis. It is anticipated that PG&E would have the capacity to supply this energy without incurring an impact to local energy supplies (see Impact 4.18(a)). The proposed project's building would be designed and constructed in accordance with the City's latest adopted energy efficiency standards, which are based on the State's Building Energy Efficiency Standards. These are widely regarded as the most advanced building energy efficiency standards and compliance would ensure that building energy consumption would not be wasteful, inefficient, or unnecessary. Additionally, the proposed residential uses would be required under the 2022 CBC, Title 24, Part 6, Subchapter 8, to include rooftop solar panels at the time those uses are developed.³⁹

As previously discussed, the proposed project would be considered to result in a potentially significant impact if it would result in wasteful, inefficient, or unnecessary consumption of energy resources. Considering the guidance provided by Appendix F of the CEQA Guidelines, the goal of conserving energy implies the wise and efficient use of energy. The means of achieving this goal include:

³⁸ City of Napa. Municipal Code 8.08.025 Noise—Construction activity. Website: <https://ecode360.com/43391434#43391434>. Accessed May 7, 2025.

³⁹ International Code Council (ICC). 2022. 2019 California Building Standards Code (CBC), Title 24, Part 6, Subchapter 8 Low-Rise Residential Building—Performance and Prescriptive Compliance Approaches.

- Decreasing overall per capita energy consumption;
- Decreasing reliance on fossil fuels such as coal, natural gas, or oil; and
- Increasing reliance on renewable energy sources.

Decreasing Overall Per Capita Energy Consumption

Project-related vehicle trips would consume fuel throughout the life of the proposed project due to project resident vehicles and delivery vehicles. Project-related vehicle trips would consume an estimated 41,556 gallons of gasoline and diesel annually (Appendix B). Regional access to the project site is provided by SR-29, which is approximately 1,000 feet from the proposed project site at its nearest location. As a result, the proposed project is located near regional and local roadways that would provide convenient access for future residents and employees. In addition, the proposed project includes the construction of a sidewalk along El Centro Avenue, as well as the construction of a new, multiuse trail, thus providing additional pedestrian and/or bicycle connectivity to reduce VMT. Therefore, transportation fuel consumption would not be wasteful, inefficient, or unnecessary.

Furthermore, the proposed project's buildings would be designed and constructed in accordance with the California Green Building Standards Code (CALGreen) energy efficiency standards of Title 24. Title 24 standards include a broad set of energy conservation requirements that apply to the structural, mechanical, electrical, and plumbing systems in a building for the purposes of reducing energy consumption. For example, the Title 24 Lighting Power Density requirements define the maximum wattage of lighting that can be used in a building based on its square footage. Title 24 standards, widely regarded as the most advanced energy efficiency standards, would help reduce the amount of energy required for lighting, water heating, and heating and air conditioning in buildings and promote energy conservation. Therefore, the proposed project would be consistent with this criterion.

Decreasing Reliance on Fossil Fuels

The proposed project would be considered to conflict with this criterion if it did not take steps to decrease the reliance on fossil fuels. The proposed project would comply with 2022 Title 24 Building Energy Efficiency Standards and CALGreen requirements, which require electric vehicle (EV) charging infrastructure, as well as electric-ready requirements and solar photovoltaic and battery storage standards. The inclusion of these features would contribute to an acceleration of EV adoption and facilitate an increase in EV and clean air and high occupancy vehicle use by residents, employees, and visitors of the proposed project, though they cannot guarantee a reduction in energy usage. The features would also serve to reduce fossil fuel use by promoting solar power storage and electric heat pumps.

Increasing Reliance on Renewable Energy Sources

As stated, the proposed project would comply with 2022 Title 24 Building Energy Efficiency Standards and CALGreen requirements, which require EV charging infrastructure, as well as electric-ready requirements and solar photovoltaic and battery storage standards. As such, the proposed project

would facilitate a greater dependence on renewable energy sources for building and transportation energy demands. Therefore, the proposed project would be consistent with this criterion.

Overall

As discussed above, the proposed project's energy consumption would not result in the wasteful, inefficient, or unnecessary consumption of energy resources, consistent with the guidance derived from Appendix F of the CEQA Guidelines and the Appellate Court decision in *League to Save Lake Tahoe Mountain etc. v. County of Placer* (2022) 75 Cal.App.5th 63, 164–168. The construction-related and operation-related impacts related to electricity, natural gas, and fuel consumption would be less than significant. Therefore, the proposed project would not introduce new significant environmental impacts or substantially increase the severity of previously analyzed significant effects under any scenario. Impacts would remain less than significant. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

b) Energy Efficiency and Renewable Energy Standards Consistency

Would the project: Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?

Summary of 2020 General Plan FEIR

The Prior FEIR did not directly address impacts related to conflicting with State or local renewable energy or energy efficiency plans. However, the Prior FEIR identified policies and implementation programs within the 2020 General Plan, such as Policy NR-5.2, which promotes the implementation of land use patterns and management practices to conserve air and energy resources; Policy NR-5.3, which encourages the advancement of energy efficiency and conservation improvement programs intended to decrease the amount of energy generated from facilities; and Napa Policy Resolution No. 27, which requires construction and operation of development projects to incorporate energy conservation measures following applicable ordinances and codes. As such, the Prior FEIR recognized policies and implementation programs within the 2020 General Plan that would not conflict with State or local renewable energy or energy efficiency plans.

Proposed Project Analysis and Conclusion

Construction

The proposed project would result in energy consumption through the combustion of fossil fuels. The proposed project would utilize a construction fleet meeting Tier 4 Interim or Final Off-road Standards, which are among the most stringent and efficient equipment available. In addition to fuel savings from the Tier 4 equipment, limitations on idling of vehicles and equipment and requirements that equipment be properly maintained would result in fuel savings. California Code of Regulations Title 13 Sections 2449(d)(3) and 2485 limit idling for both on-road and off-road diesel-powered equipment, as enforced by the ARB. The proposed project would be required to comply with these regulations. There are no renewable energy standards that would apply to construction of the proposed project. As a result,

construction would not conflict with or obstruct any regulations adopted for the purposes of increasing the use of renewable energy. Furthermore, it is anticipated that construction of the proposed project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing energy use or increasing the use of renewable energy. Therefore, the proposed project would result in less than significant impacts related to construction energy efficiency and use of fossil fuels or decreased use of renewable resources.

Operation

The proposed project would be served with electricity provided by PG&E. In 2023, PG&E obtained 32.8 percent of its electricity from eligible renewable energy sources (including biomass and biowaste, geothermal, eligible hydroelectric, solar, and wind), while the remaining electricity was sourced from large hydroelectric (13.8 percent) and nuclear (53.4 percent).⁴⁰ While PG&E's 2023 Renewable Portfolio Standard (RPS) reporting showed that only 32.8 percent of electricity sales sourced from eligible renewable sources, the RPS requirements apply to a 3-year average of utility provider electricity sourcing to allow for fluctuations in market demand and supply availability. Nonetheless, the electricity provider is required to meet the State's objective of 60 percent renewables by 2030.⁴¹

The buildings of the proposed project would be designed and constructed in accordance with California Code of Regulations Title 24, California's Energy Efficiency Standards for Residential Buildings, as applicable. These standards include minimum energy efficiency requirements related to the building envelope, mechanical systems (e.g., HVAC and water heating systems), and indoor and outdoor lighting.

The proposed project would be built in accordance with the 2022 Title 24 Energy Efficiency and CALGreen standards, including efficient electric heat pumps, electric-ready requirements, and solar photovoltaic and battery storage requirements. The proposed project would also include the addition of a sidewalk on El Centro Avenue and a multi-purpose trail, both of which will serve to promote non-vehicular travel and reduce VMT. As the proposed project would be built to applicable Title 24 Energy Efficiency and CALGreen standards, the proposed project would be consistent with relevant energy efficiency-related General Plan goals identified in the City's 2020 General Plan. Therefore, the energy impacts of the proposed project would be less than significant.

Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

⁴⁰ California Energy Commission (CEC). 2022. Power Content Label. Website: <https://www.energy.ca.gov/programs-and-topics/programs/power-source-disclosure-program/power-content-label>. Accessed May 7, 2025.

⁴¹ California Public Utilities Commission (CPUC). 2024. Renewables Portfolio Standard Program. Website: <https://www.cpuc.ca.gov/rps/>. Accessed May 7, 2025.

Applicable 2020 General Plan FEIR Mitigation Measures

None required.

Conclusion

With regard to Energy, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. There is no new information of substantial importance, change in the proposed project, or change in the circumstances under which it would be undertaken identifying new significant effects, nor is there a substantial increase in the severity of previously identified impacts. The conclusions from the Prior FEIR remain unchanged when considering the implementation of the proposed project.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.7 Geology and Soils					
Would the project:					
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:					
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?	Not Applicable	No	No	No	No
ii) Strong seismic ground shaking?	Less than significant impact	No	No	No	No
iii) Seismic-related ground failure, including liquefaction?	Less than significant impact	No	No	No	No
iv) Landslides?	Less than significant impact	No	No	No	No
b) Result in substantial soil erosion or the loss of topsoil?	Not Applicable	No	No	No	No
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,	Less than significant impact	No	No	No	No

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
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?	Not Applicable	No	No	No	No
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	Less than significant impact	No	No	No	No
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Not Applicable	No	No	No	No

a) Earthquake Hazards

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; (ii) Strong Seismic Ground Shaking; (iii) Seismic-related ground failure, including liquefaction; or (iv) Landslides.

i) Fault Rupture

Summary of 2020 General Plan FEIR

The Prior FEIR identified three active fault lines that directly transect Napa County, consisting of the Cordelia, Green Valley, and West Napa fault lines, which are capable of generating an earthquake with a magnitude 6.7 on the Richter Scale and an intensity between VIII–IX on the Modified Mercalli Intensity Scale (MMS). Although the Prior FEIR did not directly address impacts related to fault

rupture, Chapter 8, Health and Safety, of the 2020 General Plan acknowledges impacts generated from seismic events and where policies can be implemented to reduce impacts pertaining to fault rupture, such as Policy HS-1.2, which discourages the development of major facilities or those with high occupancy in areas subject to high levels of ground shaking, and Policy HS-1.3 and Napa Policy Resolution No. 27, which require soils and geologic studies for high occupancy developments in areas susceptible to high levels of ground shaking. As such, implementation of these policies would likely avoid future development from being located along fault lines that are susceptible to fault rupture during strong seismic shaking.⁴²

Proposed Project Analysis and Conclusion

The City is located in a seismically active region and earthquake-related ground shaking would be expected during the design life of the proposed structures. The project site is not in an Alquist-Priolo Fault Zone, and the closest Alquist-Priolo Fault Zone is the West Napa Fault zone, approximately 2 miles west of the project site.⁴³ The closest fault is the West Napa Fault, approximately 1.4 miles to the west.⁴⁴ The West Napa Fault runs along the western City limit. The risk of fault rupture on-site is low; however, based on the proximity to the West Napa Fault zone and other fault zones in the region, future seismic shaking should be anticipated.⁴⁵ Since the project site is not located within a designated Alquist-Priolo Earthquake Hazard Zone, no impacts would occur related to fault rupture. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

ii) Ground Shaking

Summary of 2020 General Plan FEIR

The Prior FEIR identified three active fault lines that directly transect Napa County, the Cordelia, Green Valley, and West Napa fault lines, which are capable of generating an earthquake with a magnitude 6.7 on the Richter Scale and an intensity between VIII–IX on the MMS. As such, the Prior FEIR determined that development associated with implementation of the 2020 General Plan would be susceptible to strong seismic shaking. Therefore, the 2020 General Plan contains policies and programs to minimize impacts related to strong seismic shaking within Chapter 8, Health and Safety, including Policy HS-1.1, HS-1.2, HS-1.3, HS-1.4, and HS-1.6, requiring new structures to conform to seismic requirements adopted by the Uniform Building Code (UBC), discouraging major and high occupancy developments within areas susceptible to high levels of ground shaking, and mandating soil and geologic studies for those proposed developments in areas susceptible to high levels of

⁴² City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Page 3.8-1 – 3.8-3. December 1

⁴³ California Department of Conservation (DOC). 2024. Earthquake Zones of Required Investigation. Website: <https://maps.conservation.ca.gov/cgs/EQZApp/app/>. Accessed May 7, 2025.

⁴⁴ United States Geologic Survey (USGS). U.S. Quaternary Faults. Website: <https://usgs.maps.arcgis.com/apps/webappviewer/index.html?id=5a6038b3a1684561a9b0aadf88412fcb>. Accessed May 7, 2025.

⁴⁵ RGH Consultants (RGH). 2018. Geotechnical Study Report: Zinfandel Subdivision. January 10.

ground shaking. As such, the Prior FEIR determined that policies from the implementation of the 2020 General Plan would minimize strong ground shaking to an acceptable level.⁴⁶

Proposed Project Analysis and Conclusion

The project site could experience severe seismic ground shaking similar to other parts of the Bay Area. Strong seismic ground shaking from the West Napa Fault could result in structural failure and collapse of structures or cause non-structural building elements to fall, presenting a hazard to building occupants and a potentially significant impact.

The proposed project would be subject to the most recent CBC requirements for reducing seismic hazards. Seismic design provisions of current building codes generally prescribe minimum lateral forces, which aim to reduce the horizontal force exerted on structures caused by earthquake shaking. Therefore, with implementation of the CBC, it is reasonably assumed that structures on the project site would: (1) resist minor earthquakes without damage, (2) resist moderate earthquakes without structural damage but with some nonstructural damage, and (3) resist major earthquakes without collapse but with some structural as well as nonstructural damage. Pursuant to Napa Policy Resolution No. 27's standard specifications, the project applicant would be required to prepare a design-level geotechnical report substantiated by laboratory testing and engineering calculations that incorporates all specific design recommendations into the project construction plans.⁴⁷ The design-level geotechnical report would include recommendations regarding grading, foundation design, bearing capacity, and lateral resistance that would prevent significant impacts related to seismic shaking. The City-approved geotechnical engineer would record and verify that all recommendations contained in the design-level geotechnical study are followed during construction.

The CBC is updated every 3 years; the 2022 CBC became effective January 1, 2023, with another update due January 1, 2026. As the Geotechnical Study Report prepared by RGH Consultants (RGH) was completed in 2018, an updated report based on the current version of the CBC would be required prior to construction activities. Implementing Measure (IM) GEO-1 would require that an updated, design-level geotechnical report be prepared by a licensed geotechnical engineer. IM GEO-1 further requires that all recommendations provided in the report be implemented during construction of the proposed project, and that construction activities shall be monitored by a geotechnical engineer to ensure recommendations are implemented properly.

As IM GEO-1 would ensure that the proposed project would be designed consistent with a site-specific geotechnical report based on the current CBC, the potential impacts related to strong seismic ground shaking would be less than significant. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

⁴⁶ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Page 3.8-1 - 3.8-3. December 1

⁴⁷ Napa City Council. 2002. Policy Resolution Number 27. December 3.

iii) Ground Failure

Summary of 2020 General Plan FEIR

The Prior FEIR addressed seismic-related ground failure from liquefaction and identified areas situated on Holocene Alluvium and Bay Muds that consist of poorly consolidated younger alluvium to be highly susceptible to seismic-induced liquefaction. These areas include the length of Napa Creek, along Redwood Creek north of Redwood Road, Browns Valley Creek west of Thompson Avenue, along the Napa River from Trancas Street south to John F. Kennedy Memorial Park, and in the southernmost portion of the City's RUL below SR-29. As such, the Prior FEIR indicated that development induced by implementation of the 2020 General Plan would be susceptible to liquefaction. However, the 2020 General Plan contains policies acknowledging liquefaction, such as Policy HS-1.1 and Policy Resolution No. 27, requiring new structures to conform to the seismic requirements within the UBC, and Policy HS-1.4 mandates special construction features to be incorporated into the design of structures where site investigations determine potential seismic hazards. Therefore, the Prior FEIR concluded that policies from the 2020 General Plan would minimize liquefaction hazards to an acceptable level, and impacts would be less than significant.⁴⁸

Proposed Project Analysis and Conclusion

Liquefaction is the sudden loss of strength in saturated, predominantly granular soil during strong ground shaking, due to increased pore water pressure and decreased effective stress or the portion of total stress on soil that is borne by soil grains. Areas south of the City, along the Napa River, and on the valley floor in the western area of the City are considered to have high liquefaction potential.⁴⁹ Densification is the settlement of loose, granular soil above the groundwater level due to earthquake shaking.⁵⁰ The Geotechnical Study Report identifies three liquefaction-related hazards that have the potential to occur at the project site: bearing capacity failure, lateral spreading, and settlement. The report concluded that while soil liquefaction has the potential to occur at the project site, the potential for bearing capacity failure, lateral spreading, and settlement at the project site is low.⁵¹

Granular soil was encountered at the project site below the groundwater table. The potentially liquefiable soil layers are discontinuous, and the shallowest of these soils were observed at 8 feet below ground surface (BGS), which is below the channel bottom. Therefore, liquefaction potential is low. Densification affects granular soil above groundwater level. Because granular soil has only been recorded below the groundwater table at the project site, there is low potential for densification.⁵²

The CBC is updated every 3 years; the 2022 CBC became effective January 1, 2023, with another update due January 1, 2026. As the Geotechnical Study Report prepared by RGH was completed in 2018, an updated report based on the current version of the CBC would be required prior to

⁴⁸ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Page 3.8-1 — 3.8-3. December 1

⁴⁹ City of Napa. 2015. City of Napa General Plan (reprinted). September 3.

⁵⁰ RGH Consultants (RGH). 2018. Geotechnical Study Report: Zinfandel Subdivision. January 10.

⁵¹ RGH Consultants (RGH). 2018. Geotechnical Study Report: Zinfandel Subdivision. January 10.

⁵² Ibid.

construction activities. As such, pursuant to the requirements of Napa Policy Resolution No. 27, IM GEO-1 would require that an updated, design-level geotechnical report be prepared by a licensed geotechnical engineer and that all recommendations within it would be implemented.

As the proposed project would be designed consistent with a site-specific geotechnical report based on the current CBC, the potential impacts related to seismic-related ground failure would be less than significant. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

iv) Landslides

Summary of 2020 General Plan FEIR

The Prior FEIR identified areas within the region and the RUL that are susceptible to landslides, containing steep slopes with a 15 percent slope or greater. These areas within the RUL include Browns Valley, Westwood, the eastern periphery of Alta Heights, and the eastern portion of River East. Furthermore, the Prior FEIR determined that the western side of the Napa Valley is situated on less consolidated sedimentary rock, making it highly susceptible to landslides. As such, the Prior FEIR indicated that the implementation of the 2020 General Plan could result in future developments situated on slopes of 15 percent or greater. However, the Prior FEIR ascertained that policies and implementation programs within Chapter 8, Health and Safety, of the 2020 General Plan require the preparation of erosion control plans on slopes 15 percent or greater, along with proper geotechnical studies to be conducted in areas susceptible to landslides and erosion. Therefore, the Prior FEIR determined that future development associated with the 2020 General Plan would reduce the risk of landslides to less than significant.⁵³

Proposed Project Analysis and Conclusion

The project site is relatively flat and not located near hillsides. As such, there would be a low risk of landslides at the project site. There would be no impact related to landslides. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

b) Erosion

Would the project: Result in substantial soil erosion or the loss of topsoil?

Summary of 2020 General Plan FEIR

The Prior FEIR did not directly address impacts pertaining to soil erosion or loss of topsoil. However, the Prior FEIR mentioned policies and implementation programs within Chapter 8, Health and Safety, of the 2020 General Plan, which are implemented by Napa Policy Resolution No. 27 and include the

⁵³ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Page 3.8-1 – 3.8-3. December 1

preparation of geotechnical studies and erosion control plans in areas subject to landslides and erosion. Napa Policy Resolution No. 27 further requires construction of new developments to minimize ground-disturbing activities and impervious surfaces in high-erosion areas. In addition, Napa Policy Resolution No. 27 requires adherence to the City's Public Works Department Standard Specifications related to ground-disturbing activities, obtaining erosion and sediment control plans, and complying with construction and design recommendations provided by site-specific geotechnical reports or soil investigations. Therefore, the Prior FEIR concluded that the 2020 General Plan contains policies and implementation measures to reduce and minimize impacts pertaining to soil erosion.

Proposed Project Analysis and Conclusion

Soil exposed by construction activities during project construction could be subject to erosion if exposed to heavy rain, winds, or other storm events. A Stormwater Control Plan was prepared on September 15, 2023 (Appendix D), and compliance with this plan would be a condition of issuing a grading permit.^{54,55} The Stormwater Control Plan contains site-specific construction Best Management Practices (BMPs) and Low Impact Development (LID) Design Strategies to be implemented, the rationale used for selecting or rejecting BMPs, and a list of applicable permits to be obtained. Napa Policy Resolution No. 27 requires the applicant to incorporate all recommendations included in the site-specific Geotechnical Study Report, such as maintaining dense deep-rooted ground cover on all slopes.⁵⁶ Additionally, pursuant to Napa Policy Resolution No. 27, no construction activity shall commence before the Public Works Director issues written approval of the Erosion and Sediment Control Plan.⁵⁷ The proposed project would be consistent with the Municipal Regional Stormwater National Pollutant Discharge Elimination System (NPDES) Permit and standards, enforced by the City. Adherence to NPDES requirements during construction and operation would reduce the potential for soil erosion to a less than significant impact. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

c) Unstable Soils or Geologic Units

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 landsliding, lateral spreading, subsidence, liquefaction, or collapse?

Summary of 2020 General Plan FEIR

The Prior FEIR identified certain areas in Napa Valley and the RUL containing unstable geologic conditions, such as liquefaction and landslides. As such, development generated from the

⁵⁴ Trinity Project. 2019. Erosion and Sediment Control Plan. October 17.

⁵⁵ Napa City Council. 2002. Policy Resolution Number 27. December 3.

⁵⁶ RGH Consultants (RGH). 2018. Geotechnical Study Report: Zinfandel Subdivision. January 10.

⁵⁷ Napa City Council. 2002. Policy Resolution Number 27. December 3.

implementation of the 2020 General Plan could occur in areas susceptible to unstable geologic conditions or that could become unstable from the results of such development. However, the Prior FEIR recognized policies and implementation programs in the 2020 General Plan, such as Implementation Program HS-2.B requiring geotechnical studies in areas with high susceptibility to landslides and erosion; Policy HS-2.4 and Implementation Program HS-2.C necessitating the implementation of erosion control plans on 15 percent or greater slopes; and Napa Policy Resolution No. 27, which mandates project compliance with construction and design recommendations addressed in project-specific geotechnical reports and soil investigations. As such, the Prior FEIR confirmed that the 2020 General Plan contains policies and implementation programs that would reduce and minimize risks of subsurface hazards. Therefore, the Prior FEIR concluded that impacts would be less than significant.⁵⁸

Proposed Project Analysis and Conclusion

As discussed above, liquefaction and landslide potential are low for the project site.⁵⁹ Site-specific construction design and practices during activities, such as grading, trenching, backfilling, and compaction, would be incorporated pursuant to Policy Resolution No. 27 of the Napa City Council or Public Works Department standard specifications to reduce risks from unstable soil.⁶⁰

As discussed above, an updated geotechnical report based on the current version of the CBC would be required prior to construction activities through the implementation of IM GEO-1 pursuant to Policy Resolution No. 27. As the proposed project would be designed consistent with a City-approved site-specific geotechnical report based on the current CBC, the potential operational impacts related to unstable soil would be less than significant. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

d) Expansive Soils

Would the project: Be located on expansive soil, creating substantial direct or indirect risks to life or property?

Summary of 2020 General Plan FEIR

The Prior FEIR did not directly address impacts pertaining to expansive soils. However, the Prior FEIR indicated that development projects induced from the 2020 General Plan would adhere to Policy Resolution No. 27, which requires development projects to comply with design and construction recommendations provided in site-specific geotechnical reports and soil investigations prepared for such projects. As such, the Prior FEIR determined that the 2020 General Plan does contain measures that could be implemented to reduce or avoid impacts related to expansive soils.

⁵⁸ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Page 3.8-1 - 3.8-3. December 1.

⁵⁹ RGH Consultants (RGH). 2018. Geotechnical Study Report: Zinfandel Subdivision. January 10.

⁶⁰ Napa City Council. 2002. Policy Resolution Number 27. December 3.

Proposed Project Analysis and Conclusion

Expansive soil is soil that displays a “shrink-swell” characteristic, which is described as the cyclic change in volume (expansion and contraction) that occurs in fine-grained clay sediments from the process of wetting and drying. Structural damage may occur over time as a result of inadequate soil and foundation engineering or the placement of structures directly on expansive soil. Expansive soil may be present throughout the County. The Geotechnical Study Report indicates that the soil at the project site can have a medium to high expansion potential.

Surface soil on the project site can be locally expansive. To reduce the effects of expansive soils, the proposed project would implement recommendations and standard engineering practices of the site-specific Geotechnical Study Report.

As discussed above, an updated geotechnical report based on the current version of the CBC would be required prior to construction activities according to IM GEO-1 pursuant to Policy Resolution No. 27. As the proposed project would be designed consistent with a City-approved site-specific geotechnical report based on the current CBC, the potential operational impacts related to expansive soil would be less than significant. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

e) Septic Tanks

Would the project: Have soils incapable of supporting the use of septic tanks or other alternative wastewater disposal systems where sewers are not available?

Summary of 2020 General Plan FEIR

The Prior FEIR indicated that most of the development to be constructed within the expansion of the RUL associated with the implementation of the 2020 General Plan would occur on infill development sites in an already urbanized area. As such, development projects associated with the implementation of the 2020 General Plan would likely connect to the City’s existing wastewater disposal system. However, in the event that future development would require the construction of septic tanks, the Prior FEIR highlighted measures discussed in the 2020 General Plan, including from Policy Resolution No. 27, which would require development projects to implement recommended construction and design criteria analyzed in site-specific soil investigation or geotechnical reports. These site-specific reports would include design and subsurface recommendations for the construction of any project-related septic tanks or wastewater disposal systems. As such, the Prior FEIR identified measures within the 2020 General Plan that would address site-specific soils unable to support septic tanks. Therefore, the Prior FEIR concluded that impacts would be less than significant.

Proposed Project Analysis and Conclusion

There is an existing septic tank at the project site. This septic tank would be removed per County Health Department standards. Following the removal of the existing septic tank, the proposed project would be served by Napa Sanitation District (NapaSan) via existing and new sanitary sewer laterals. The removal of the existing septic tank would not result in an impact related to this criterion, as this criterion is related to having adequate soil for supporting septic tanks and alternative wastewater disposal systems. As the proposed project would not include the installation or use of septic tanks or alternative wastewater disposal systems, there would be no impact under this criterion. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

f) Destruction of Paleontological Resource or Unique Geologic Feature

Would the project: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Summary of 2020 General Plan FEIR

The checklist question was not included in the Prior FEIR. No conclusion was made in the Prior FEIR regarding the significance level of impacts related to the proposed project's potential to directly or indirectly destroy a unique paleontological resource or geologic feature.

Proposed Project Analysis and Conclusion

A Paleontological Records Search conducted by a consulting Paleontologist (Appendix D) concluded that the entire project site is of the latest Pleistocene alluvium, which has a high paleontological sensitivity but usually low or uncertain paleontological potential. Additionally, County paleontological records do not indicate significant paleontological resources from Pleistocene deposits in Napa Valley. Therefore, Pleistocene alluvium in the County has an extremely low potential of yielding significant paleontological resources and impacts would be less than significant. As such, a paleontological walkover survey prior to construction or paleontological monitoring during construction-related excavations are not warranted.⁶¹

In the unlikely case that any vertebrate remains are unearthed during project construction, the construction crew shall not attempt to remove them pursuant to Policy Resolution No. 27 of the Napa City Council. All work in the immediate vicinity of the discovery would be diverted at least 15 feet away from the find until it is assessed by a professional Paleontologist and, if deemed significant, salvaged in a timely manner, as stipulated by Policy Resolution No. 27 of the Napa City Council.⁶² All recovered fossils would be deposited in an appropriate repository, such as the University of California Museum of Paleontology, where they would be properly curated and made accessible for future

⁶¹ Finger, Kenneth L. PhD. 2020. Paleontological Records Search: Zinfandel Subdivision Project. May 8.

⁶² Napa City Council. 2002. Policy Resolution Number 27. December 3.

study.⁶³ As such, impacts would be less than significant. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

Applicable 2020 General Plan FEIR Mitigation Measures

None required.

Project-specific Implementation Measures

As detailed above, the proposed project would be required to implement IM GEO-1 to demonstrate compliance with Napa Policy Resolution No. 27 VI.5.

IM GEO-1 Design-level Geotechnical Report

Prior to construction activities, an updated design-level geotechnical study shall be prepared by a qualified Geotechnical Engineer. The recommendations included in the design-level geotechnical study shall be implemented during construction activities, including grading and excavation. Monitoring and testing by a geotechnical engineer during construction shall be conducted to ensure all design recommendations are implemented properly.

Conclusion

With regard to Geology and Soils, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. There is no new information of substantial importance, change in the proposed project, or change in the circumstances under which it would be undertaken identifying new significant effects, nor is there a substantial increase in the severity of previously identified impacts. The conclusions from the Prior FEIR remain unchanged when considering the implementation of the proposed project.

⁶³ Finger, Kenneth L. PhD. 2020. Paleontological Records Search: Zinfandel Subdivision Project. May 8.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.8 Greenhouse Gas Emissions					
Would the project:					
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Not Applicable	No	No	No	No
b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	Not Applicable	No	No	No	No

Methodology

Lead agencies have discretion to formulate their own significance thresholds (CEQA Guidelines § 15064.7(b)). The determination by a lead agency of whether a project may have significant effect on the environment calls for careful judgment, based, to the extent possible, on scientific and factual data (CEQA Guidelines § 15064(b)(1)). Thus, establishing a single threshold of significance, while desirable in most instances, may not be possible for every environmental impact because the significance of an impact may vary with the setting. While the Bay Area Air District recommends that its GHG thresholds be used to determine the significance of project emissions, the final determination of whether a project is significant is within the purview of the City, as Lead Agency pursuant to Section 15064(b) of the CEQA Guidelines.

Appendix G to the CEQA Guidelines is a sample Initial Study Checklist that includes questions for determining whether impacts related to the emissions of GHGs are significant. These questions reflect the input of planning and environmental professionals at the California Governor's Office of Planning and Research (OPR) and the California Natural Resources Agency based on input from stakeholder groups and experts in various other governmental agencies, nonprofits, and leading environmental consulting firms. They also reflect the requirements of laws other than CEQA, such as AB 32 and AB 1279. As a result, many lead agencies derive their significance criteria from the questions posed in Appendix G. The City has chosen to do so for this proposed project. Therefore, the proposed project's GHG emissions would have a significant impact if the proposed project would:

- Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or
- Conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.

In addition, CEQA Guidelines Section 15064.4(b) 2018 amendments for GHG emissions states that a lead agency may take into account the following three considerations in assessing the significance of impacts from GHG emissions.

- **Consideration No. 1:** The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting.
- **Consideration No. 2:** Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
- **Consideration No. 3:** The extent to which the project complies with regulations or requirements adopted to implement a Statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Such regulations or requirements must be adopted by the relevant public agency through a public review process and must include specific requirements that reduce or mitigate the project's incremental contribution of greenhouse gas emissions. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project. In determining the significance of impacts, the lead agency may consider a project's consistency with the State's long-term climate goals or strategies, provided that substantial evidence supports the agency's analysis of how those goals or strategies address the project's incremental contribution to climate change and its conclusion that the project's incremental contribution is not cumulatively considerable.

Accordingly, the proposed project is evaluated against the guidance in Appendix G GHG, taking into account Considerations 1 through 3 as described above.

A quantitative analysis was prepared for the proposed project to determine the extent to which it may increase or reduce GHG emissions as compared to the existing environmental setting to fulfill Consideration 1; however, this analysis was completed for informational purposes only.

Regarding Considerations 2 and 3, the City has elected to evaluate the proposed project based on qualitative assessments of compliance with the 2022 Scoping Plan (including Appendix D) to support GHG significance findings under Impacts GHG-1 and GHG-2.

The 2022 Scoping Plan reaffirms and clarifies the role of local governments in achieving the State's climate goals, particularly as it concerns the approval of new land use development projects and their environmental review under CEQA. It outlines three distinct approaches that lead agencies may consider for evaluating the consistency of proposed plans and residential and mixed-use development projects with the State's climate goals:

- The first approach involves consistency with a GHG reduction plan, such as a CEQA-qualified CAP.
- The second approach involves determining whether a project would result in net-zero GHG emissions.
- The third approach involves assessing a project's consistency with key project attributes that have been demonstrated to reduce operational GHG emissions while advancing fair housing.

In other words, the 2022 Scoping Plan considers these approaches to evaluate whether a project may have a less than significant impact on GHG emissions. An evaluation of a project's consistency with the Scoping Plan serves as a roadmap for evaluating the project's current design and determining whether it complies with current policies and planned reduction measures for GHG emissions.

a) Greenhouse Gas Emissions

Would the project: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Summary of 2020 General Plan FEIR

This checklist question was not included in the Prior FEIR. No conclusion was made in the Prior FEIR regarding the significance level of impacts related to the proposed project directly or indirectly generating GHG emissions.

Proposed Project Analysis and Conclusion

Both construction and operational activities have the potential to generate GHG emissions. The proposed project would generate GHG emissions during temporary (short-term) construction activities such as demolition and grading, running of construction equipment engines, movement of on-site heavy-duty construction vehicles, hauling of materials to and from the project site, asphalt paving, and construction worker, vendor, and haul truck motor vehicle trips.

Long-term operational GHG emissions most often result from project-generated vehicular traffic, on-site combustion of natural gas, operation of any landscaping equipment, off-site generation of electrical power over the life of the proposed project, the energy required to convey water to and wastewater from the project site, and the emissions associated with the hauling and disposal of solid waste from the project site.

Project Emissions for Information Purposes

As explained above in Thresholds of Significance Consideration 1, quantification of project GHG emissions is provided to show the increase in GHG emission compared to existing setting for informational purposes only.

Construction

The proposed project would emit GHG emissions during construction from the off-road equipment, worker vehicles, and any hauling that may occur. Total GHG emissions generated throughout construction were combined and are presented in Table 10.

While the proposed project is anticipated to be constructed in 18 to 36 months (as described in the Air Quality section), project construction was modeled to occur over an 18-month period (pursuant to worst-case, CalEEMod default assumptions).

Table 10: Construction GHG Emissions – Informational Purposes Only

Construction Phase and Year	MT CO ₂ e per year
Demolition (2025)	38.342
Site Preparation (2025)	24.759
Grading (2025)	126.853
Building Construction (2025)	34.717
Building Construction (2026)	332.578
Building Construction (2027)	13.629
Paving (2027)	14.843
Total Construction Emissions	585.72
Notes: MT CO ₂ e = metric tons of carbon dioxide equivalent Totals may not add up due to rounding. Source: CalEEMod Output (Appendix B).	

Operation

The proposed project would contribute to global climate change through direct and indirect emissions of GHG from mobile sources (e.g., passenger vehicles, trucks), energy (e.g., on-site natural gas consumption and purchased electricity), water use and wastewater generation, and solid waste generation. All modeling parameters utilized in the Air Quality analysis are also utilized for this GHG analysis, including but not limited to trip generation rates, trip distances, building sizes and operations, energy consumption, water consumption, and waste generation. Please refer to Appendix B for modeling results and detailed calculations.

Operational GHG emissions by source are shown in Table 11. Operation of the proposed project at buildout is estimated to result in an annual GHG emissions inventory of approximately 556.97 metric tons (MT) carbon dioxide equivalent (CO₂e) per year.

Table 11: Annual Operational GHG Emissions – Informational Purposes Only

Emission Source	Year 2024 Total Emissions (MT CO ₂ e per year)
Area	2.28
Energy	150.02
Mobile (Vehicles)	385.89
Waste	12.80
Water	5.68
Refrigerants	0.30
Total Annual Project Emissions	556.97
Note: MT CO ₂ e = metric tons of carbon dioxide equivalent Source: CalEEMod (Appendix B).	

Project Impact

The following discussion evaluates if the proposed project could generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment by comparing the proposed project to the goals of the 2022 Scoping Plan, Executive Order (EO) B-30-15, SB 32, and AB 197.

EO B-30-15 added the mandated target of reducing GHG emissions to 40 percent below 1990 levels by 2030. The ARB released a second update to the Scoping Plan, the 2017 Scoping Plan, to reflect the 2030 target set by EO B-30-15 and codified by SB 32. SB 32 affirms 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 EO B-30-15. SB 32 builds on AB 32 and keeps California on the path toward achieving the State's 2050 objective of reducing emissions to 80 percent below 1990 levels. The companion bill to SB 32, AB 197, provides additional direction to ARB related to the adoption of strategies to reduce GHG emissions. Additional direction in AB 197 is intended to provide easier public access to air emissions data that are collected by ARB was posted in December 2016.

As discussed under the Regulatory Framework section, ARB updates the Scoping Plan at least every 5 years to create a regulatory framework to achieve these State-mandated GHG emissions reduction targets. Accordingly, the 2022 Scoping Plan outlines strategies across nearly all levels of California's government and economy and defines—at a granular level—the regulatory actions needed to reduce GHG emissions from all emission sectors to meet the targets. The 2022 Scoping Plan assesses progress toward the statutory 2030 target while laying out a path to achieving carbon neutrality no later than 2045.

GHGs in California are emitted from seven economic sectors: industry; transportation; residential; commercial; agriculture and forestry; electricity (imports); and electricity (in-State production). The

2022 Scoping Plan identifies strategies to reduce GHGs in each of the sectors, and across the board, 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 times the solar and wind capacity by 2045 and about 1,700 times the current hydrogen supply. As discussed in the 2022 Scoping Plan, EO N-79-20 requires that all new passenger vehicles sold in California 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.

As it relates to the residential economic sector, the 2022 Scoping Plan requires (through the Building Energy Efficiencies Standards [Energy Code]) all-electric appliances beginning in 2026 (residential), contributing to 6 million heat pumps installed Statewide by 2030. In existing residential buildings, 100 percent of appliance sales are to be electric by 2035, and as appliances are replaced at end of life, by 2030 there will be 3 million all-electric and electric-ready homes—and by 2035, 7 million homes will be electric-ready. The proposed project would comply with the 2022 Energy Code, which requires single-family residential buildings to be “electric-ready.” This includes requirements to be energy storage systems ready; heat pump space heater ready; and electric clothes dryer ready. Furthermore, all single-family residential buildings shall have a newly installed photovoltaic system meeting the minimum qualification requirements for electrical output. The proposed project would also comply with the latest CALGreen Code (2022)—including requirements that facilitate future installation and use of EV chargers for electric vehicles—along with energy conservation, indoor and outdoor water conservation, and green building standards.

Water conservation and efficiency measures in the residential building sector are intended to continue energy efficiency programs and use cleaner energy sources to move and treat water. Increasing the efficiency of water transport and reducing water use would reduce GHG emissions. As noted above, the proposed project would comply with the current CALGreen Code, which includes a variety of indoor and outdoor water conservation measures, including the reduction of wastewater and water use. In addition, the proposed project would be required to comply with the California Model Water Efficient Landscape Ordinance.

The proposed project would be served with electricity provided by PG&E. In 2023, PG&E obtained 32.8 percent of its electricity from eligible renewable energy sources while the remaining electricity was sourced from large hydroelectric (13.8 percent) and nuclear (53.49 percent).⁶⁴ PG&E's 2022 RPS reporting showed that while 38 percent of electricity sales are sourced from eligible renewable sources, the RPS requirements apply to a 3-year average of utility provider electricity sourcing to allow for fluctuations in market demand and supply availability. Nonetheless, the electricity provider is required to meet the State's objective of 60 percent renewables by 2030.⁶⁵ The RPS encompasses the GHG emission reductions needed from the electricity sectors (both in-State and imports).

⁶⁴ California Energy Commission (CEC). 2022. Power Content Label. Website: <https://www.energy.ca.gov/programs-and-topics/programs/power-source-disclosure-program/power-content-label>. Accessed May 7, 2025.

⁶⁵ California Public Utilities Commission (CPUC). 2024. Renewables Portfolio Standard Program. Website:

The goal of transportation and motor vehicle measures in the 2022 Scoping Plan is to develop regional GHG emissions reduction targets for passenger vehicles and reduce overall emissions from vehicles and fuels. Specific regional emission targets for transportation emissions would not directly apply to the proposed project. The Advanced Clean Cars II (ACC II) will reduce GHG emissions from new cars and is designed to phase to 100 percent new vehicle ZEVs and clean plug-in hybrid-electric vehicles (PHEVs) in California by 2035. The Low Carbon Fuel Standard will increase the availability and use of low carbon fuels, including renewable diesel, biodiesel, and renewable and natural gas, by mandating that the fuel carbon intensity in California must achieve a 20 percent reduction by 2030. Vehicles traveling to the proposed project site would comply with ACC II and the Low Carbon Fuel Standard. In addition, the proposed project includes the construction of a new sidewalk on El Centro Avenue and a multi-purpose trail, both designed to promote non-vehicular use and reduce VMT. The proposed project would also include wiring and conduits capable of supporting electric vehicle charging consistent with CALGreen Tier 2 EV requirements. Therefore, the proposed project would not conflict with the identified transportation and motor vehicle measures in the 2022 Scoping Plan.

Measures in the 2022 Scoping Plan targeted at the industrial, commercial, and agriculture and forestry sectors are not applicable to the proposed project and are therefore not discussed.

The proposed project would implement the applicable residential building electricity and transportation measures as defined in the 2022 Scoping Plan to keep the State on the path to meeting mandated GHG reduction targets. Therefore, the proposed project would comply with existing State regulations adopted to achieve the overall GHG emissions reduction goals identified in EO B-30-15, SB 32, and AB 197 and would be consistent with (and would not conflict with) all applicable plans and programs designed to reduce GHG emissions. Accordingly, the proposed project would contribute its portion of what the State deems necessary to achieve California's long-term climate goals, and the proposed project would not result in a cumulatively considerable impact to global climate change. This impact would be less than significant. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

b) Greenhouse Gases Emissions Reduction Plan Conflict

Would the project: Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?

Summary of 2020 General Plan FEIR

This checklist question was not included in the Prior FEIR. No conclusion was made in the Prior FEIR regarding the significance level of impacts related to the project conflicting with any plan, policy, or regulation adopted to reduce GHG emissions.

<https://www.cpuc.ca.gov/rps/>. Accessed May 7, 2025.

Proposed Project Analysis and Conclusion

The following discusses project consistency with applicable plans adopted for the purpose of reducing GHG emissions, which include ARB's 2022 Scoping Plan, Metropolitan Transportation Commission (MTC)/ABAG Plan Bay Area 2050, and City of Napa's Sustainability Plan.

2022 Scoping Plan Update

The principal State plan and policy for GHG emission reduction targets are set forth in EO S-03-05, AB 32, and the subsequent SB 32. The quantitative goal of AB 32 was to reduce GHG emissions to 1990 levels by 2020. AB 32 required the ARB to develop a Scoping Plan that described California's approach to reduce GHGs to achieve the 2020 emission target. This target was ultimately achieved 4 years earlier than mandated. SB 32 then accelerated the GHG emission reduction goals of AB 32. The 2022 Scoping Plan, the most recent update to the ARB Scoping Plan, reflects the 2030 target of a 40 percent reduction below 1990 levels as set by EO B-30-15 and codified by SB 32. It is applicable to State agencies but is not directly applicable to cities/counties and individual projects (i.e., the Scoping Plan does not require the City to adopt policies, programs, or regulations to reduce GHG emissions). However, new regulations adopted by the State agencies outlined in the Scoping Plan result in GHG emissions reductions at the local level, for example, through Statewide building codes. As a result, local jurisdictions benefit from reductions in transportation emissions, increases in water efficiency in the building and landscape codes, and other Statewide actions that affect a local jurisdiction's emissions inventory from the top down.

The 2022 Scoping Plan provides guidance for evaluating a project's consistency with the State's goals for CEQA GHG analyses of residential projects. According to the 2022 Scoping Plan, residential projects that incorporate all of the project attributes shown in Table 12 will be considered consistency with the Scoping Plan and, therefore, may result in less than significant GHG impacts under CEQA.

Table 13 provides an analysis of the proposed project's consistency with the relevant 2022 Scoping Plan measures. Measures that are not directly applicable to the proposed project are not shown.

Table 12: Residential and Mixed-use Project Attributes that Reduce GHGs

2022 Scoping Plan GHG Reduction Measure	Project Consistency
Transportation Electrification: Provides electric vehicle (EV) charging infrastructure that, at minimum, meets the most ambitious voluntary standard in the California Green Building Standards Code at the time of project approval.	Consistent. The proposed project would meet the voluntary standard in the California Green Building Standards for EV charging infrastructure at the time of project approval.
VMT Reduction 1: Is located on infill sites that are surrounded by existing urban uses and reuses or redevelops previously undeveloped or underutilized land that is presently served by existing utilities and	Consistent. The proposed project would begin construction prior to 2026 (construction is estimated to begin in 2025) and would be required to comply with the 2022 Energy Code, which requires single-family residential buildings to be "electric-ready." This

2022 Scoping Plan GHG Reduction Measure	Project Consistency
essential public services (e.g., transit, streets, water, sewer).	includes requirements to be energy storage systems ready; heat pump space heater ready; and electric clothes dryer ready.
VT Reduction 2: Does not result in the loss or conversion of natural and working lands.	Not applicable. The proposed project entails new residential construction (not existing). However, the proposed project would be “electric-ready” and will be ready to accommodate all-electric appliances.
VT Reduction 3: Consists of transit-supportive densities (minimum of 20 residential dwelling units per acre) <u>OR</u> is in proximity to existing transit stops (within a half mile) <u>OR</u> satisfies more detailed and stringent criteria specified in the region’s Sustainable Communities Strategy (SCS).	Consistent. The proposed project construction will begin in 2025, which is prior to the year 2030 when any fleet electrification requirements will begin.
VT Reduction 4: Reduces parking requirements by: eliminating parking requirements or including maximum parking ratios (i.e., the ratio of parking spaces to residential units or square feet); OR providing residential parking supply at a ratio of less than one parking space per dwelling unit; OR for multi-family residential development, requiring parking costs to be unbundled from costs to rent or own a residential unit.	Consistent. The proposed project consists of single-family homes that would have garage and driveway parking spaces; however, the parking is not required.
VT Reduction 5: At least 20 percent of units included are affordable to lower-income residents.	Consistent. The proposed project would include 12 accessory dwelling units (ADUs). ADUs are an affordable housing option. ⁶⁶
VT Reduction 6: Results in no net loss of existing affordable units.	Consistent. The proposed project would not demolish or remove any affordable housing units.
Building Decarbonization: uses all-electric appliances without any natural gas connections and does not use propane or other fossil fuels for space heating, water heating, or indoor cooking.	Consistent. The proposed project would begin construction prior to 2026 (construction is estimated to begin in 2025) and would be required to comply with the 2022 Energy Code, which requires single-family residential buildings to be “electric-ready.” This includes requirements to be energy storage systems ready; heat pump space heater ready; and electric clothes dryer ready.
Source of ARB 2022 Scoping Plan Appendix D, Local Actions: California Air Resource Board (ARB). 2022. 2022 Scoping Plan for Achieving Carbon Neutrality, Appendix D. December. Website: https://ww2.arb.ca.gov/sites/default/files/2022-05/2022-draft-sp-appendix-d-local-actions_0.pdf . Accessed May 7, 2025.	

⁶⁶ Habitat for Humanity. Affordable Accessory Dwelling Units: Innovative Housing Solutions for Households with Low Incomes and Older Adults. Website: https://www.habitat.org/sites/default/files/documents/ADU-Evidence-Brief_Habitat-AARP.pdf. Accessed on: May 7, 2025.

As shown in Table 13, implementation of the proposed project would not conflict with the reduction measures proposed in the 2022 Scoping Plan.

Metropolitan Transportation Commission Plan Bay Area

As part of the implementing framework for Plan Bay Area 2050, local governments have identified planned development areas to focus growth. The proposed project site is within the planning area of the City of Napa's 2020 General Plan and is consistent with applicable land use designations. Thus, the proposed project would be consistent with the overall goals of Plan Bay Area, which include reducing VMT and concentrating new investment in infill areas with existing urban and transportation infrastructure. Additionally, the proposed project includes construction of a sidewalk on El Centro Avenue and a multiuse trail that would promote non-vehicular modes of travel. Given these considerations, the proposed project would not conflict with the land use and transportation concept plan in Plan Bay Area 2050.

City of Napa Sustainability Plan

The City of Napa has not adopted a Climate Action Plan (CAP). In 2012, the City adopted its first Sustainability Plan. The Sustainability Plan represents the City's attempt at compiling a list of voluntary actions that the City may encourage or advance in order to promote sustainability throughout the City. These actions fall into categories such as energy, transportation, water, recycling and waste reduction, planning and land use, local food, natural and built environment, local business and economy, and community connectedness. The Sustainability Plan has no applicability to private land use development projects such as the proposed project, but it does identify various City of Napa General Plan measures that the City considers to be relevant to sustainability and, therefore, climate change. These General Plan measures also have limited applicability to the proposed project, but they generally entail promoting wastewater conservation, green building practices, and energy efficiency. The proposed project would be built in accordance with the latest Title 24 Energy Efficiency and CALGreen standards, and it would include solar photovoltaic systems. Title 24 and CALGreen standards also would ensure that the proposed project is built to the State's latest water conservation and efficiency standards. As stated, the Sustainability Plan has no applicability to private land use development projects; however, it does identify City of Napa General Plan measures relevant to sustainability that have limited applicability to the proposed project. Those include promoting wastewater conservation, green building practices, and energy efficiency. As the proposed project would be built to applicable Title 24 Energy Efficiency and CALGreen standards, which promote reduced energy consumption, reduced water consumption, and green building practices, the proposed project would be consistent with the City's Sustainability Plan.

Summary

The proposed project is consistent with the ARB's Scoping Plan, MTC/ABAG's Plan Bay Area 2050, and the City of Napa's Sustainability Plan. Therefore, the proposed project does not conflict with any plans to reduce GHG emissions and the impact would be less than significant. The proposed project does not have any project-specific significant effects which are peculiar to the project or its site. It

would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

Applicable 2020 General Plan FEIR Mitigation Measures

None required.

Conclusion

With regard to GHG emissions, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. There is no new information of substantial importance, change in the proposed project, or change in the circumstances under which it would be undertaken identifying new significant effects, nor is there a substantial increase in the severity of previously identified impacts. The conclusions from the Prior FEIR remain unchanged when considering the implementation of the proposed project.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.9 Hazards and Hazardous Materials					
Would the project:					
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Less than significant impact	No	No	No	No
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?	Less than significant impact	No	No	No	No
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Not Applicable	No	No	No	No
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?	Not Applicable	No	No	No	No
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two	Less than significant impact	No	No	No	No

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
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?	Less than significant impact	No	No	No	No
g) Expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?	Less than significant impact	No	No	No	No

a) Routine Transport, Use, or Disposal of Hazardous Materials

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

Summary of 2020 General Plan FEIR

The Prior FEIR outlined existing conditions on the transportation, use, and disposal of hazardous materials throughout the City at the time the 2020 General Plan was prepared. Transportation of hazardous materials within the City occurs primary along SR-12, SR-29, SR-121, SR-128, and SR-221, and the City does not contain any off-site treatment or disposal sites for hazardous wastes. Approximately 1,000 companies in the City contain Hazardous Materials Management Plans (HMMPs), which are required for companies storing hazardous materials above established threshold quantities in the County. The Prior FEIR designates that the 2020 General Plan would permit industrial and commercial uses that may utilize, store, and dispose of hazardous materials within the RUL. However, the Prior FEIR indicates that development associated with the implementation of the 2020 General Plan would not create a significant hazard to the public as new developments that store and dispose of significant amounts of hazardous waste would be required to contain HMMPs, which are reviewed and monitored by the Napa County Department of Environmental Management.

Furthermore, the City adopted a Source Reduction and Recycling Element (SRRE) with a separate Household Hazardous Waste Element (HHWE) that establishes goals to reduce household hazardous waste storage within homes for future disposal. In addition, Chapter 8, Health and Safety, of the 2020 General Plan contains policies that would reduce hazardous materials exposure to the public, including reevaluating the short-term goals of the City's HHWE and requiring the City to analyze whether industrial developments are designed to minimize hazardous materials generation. Therefore, the Prior FEIR concluded that the implementation of the 2020 General Plan would not pose a significant hazard to the public within the RUL or adjacent areas, including on the routine transport, use, and disposal of hazardous materials.⁶⁷

Proposed Project Analysis and Conclusion

Small quantities of hazardous materials could be used during construction and landscaping activities during project development, including materials such as oil, gas, paint, etc., during construction, as well as small quantities of cleaning and maintenance chemicals for household use; however, no other hazardous chemicals would be used or stored on-site. These small quantities of construction, cleaning, and maintenance materials would not pose a threat to the environment, adjacent land uses, or public health.

Demolition materials from existing structures that could contain asbestos or lead-based paint, as well as electrical transformers containing polychlorinated biphenyl (PCBs), would be disposed of in accordance with California Department of Toxic Substances Control (DTSC) and the California Occupational Safety and Health Administration (Cal/OSHA) regulations pertaining to the disposal of such hazardous materials. Therefore, construction of the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant. Operation of the proposed project would not require the routine transport, use, or disposal of hazardous materials. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

b) Risk of Upset

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?

Summary of 2020 General Plan FEIR

The Prior FEIR identified areas within the County that previously stored or currently store hazardous materials, such as approximately 100 sites containing a total of 200 to 250 leaking or contaminated underground storage tanks (USTs), some former tannery sites underlain by contaminated soils from

⁶⁷ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Page 3.12-3. December 1.

the previous discharge of pollutants, and gasoline plants and stations situated along the Napa River. In addition, the Prior FEIR acknowledged reasonably foreseeable upset and accident conditions from the results of hazardous materials transport within the City, such as the release of toxic emissions and pollution, traffic disruption, and fires. However, the Prior FEIR identified policies within the 2020 General Plan that include the maintenance of emergency response plans, identification of evacuation routes, and citywide rehearsal of procedures, which would maintain and improve hazardous materials incident response. Furthermore, the Prior FEIR indicated that the Napa County Department of Environmental Management would review HMMPs from facilities that store hazardous materials where those facilities identified with high quantities of hazardous materials would be required to submit Risk Management Prevention Plans (RMPPs) assessing the risks of chemical release. Development would also be required to implement mitigation plans to minimize the risk of release to the surrounding community. As such, the Prior FEIR determined that development associated with the 2020 General Plan would comply with policies and implementation programs that would reduce hazardous materials impacts to those within the RUL and surrounding area, including those associated with upset and accident conditions. Therefore, the Prior FEIR concluded that impacts would be less than significant.⁶⁸

Proposed Project Analysis and Conclusion

According to the Phase I Environmental Site Assessment (Phase I ESA), the project site currently contains two approximately 500-gallon aboveground fuel storage tanks used to store gasoline and diesel (Appendix E). These tanks are in good condition and housed in sturdy secondary containment structures. Small quantities of vineyard management and equipment maintenance chemicals and small amounts of household cleaners stored in the equipment storage building or agricultural chemical storage building were also observed. As such, the Phase I ESA identified the vicinity where the diesel and gasoline aboveground storage tanks were stored and dispensed as a potential environmental condition on the project site. The Phase I ESA determined that there is the potential that fuels may have spilled onto the soil in this area, but the presence of aboveground storage tanks and use of pesticides are very common in winery properties. Therefore, the likelihood of an enforcement action is small, even if a release occurred.

Furthermore, CKG Environmental Inc.'s (CKG's) Soil Trench Observations describe additional analysis performed to determine the potential impacts of the aboveground storage tanks identified in the Phase I ESA. CKG excavated a series of trenches in the soil adjacent to the present fuel storage tanks and an area where tanks had been located historically on January 11, 2018. CKG concluded that there was no indication of a significant release of petroleum hydrocarbons at the known locations of the present or historical aboveground storage tanks. Therefore, impacts would be less than significant. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

⁶⁸ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Page 3.12-1 – 3.12-3. December 1.

c) Exposure of Schools to Hazardous Materials or Emissions

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?

Summary of 2020 General Plan FEIR

The Prior FEIR did not directly address exposure of schools to hazardous materials or emissions. However, the Prior FEIR identified policies and implementation programs within the 2020 General Plan that would reduce hazardous materials impacts, such as Policy LU-7.4, which would require the City to ensure that industrial developments are designed to minimize hazardous materials generation. In addition, the 2020 General Plan would permit commercial and industrial uses that store, use, and dispose of hazardous materials above threshold quantities within the County and would require those facilities to develop HMMPs as reviewed and monitored by the Napa County Department of Environmental Management, as well as develop RMPPs which would assess and minimize the risks of hazardous materials release to the surrounding community.⁶⁹ As such, the Prior FEIR concluded that developments associated with implementation of the 2020 General Plan would not generate hazardous materials and waste impacts to the RUL or surrounding environment, which can include those associated with hazardous materials impacts within 0.25 mile of an existing or proposed school.

Proposed Project Analysis and Conclusion

The nearest school to the project site is Willow Elementary School, approximately 715 feet northeast of the project site, within 0.25 mile of the project site. Justin-Siena High School is approximately 0.48 miles west of the project site, and Unidos Middle School is approximately 0.55 miles northwest of the project site.

As described above, the operation of the proposed project would not involve the routine use, transport, or disposal of hazardous or acutely hazardous materials; any fuels, lubricants, or other potentially hazardous materials used during construction would be handled carefully in compliance with all applicable laws and regulations and would have little to no chance of affecting the school. Therefore, despite Willow Elementary School being located less than 0.25 mile from the project site, it is unlikely that the school would be affected by the use of routine chemical substances or hazardous waste on the project site. Proper handling and disposal of all hazardous chemicals during operation, as well as any asbestos-containing materials or lead-based paint, would be disposed of in compliance with all applicable federal, State, and local regulations. Therefore, impacts would be less than significant. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

⁶⁹ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Page 3.12-1 – Page 3.12-3. December 1.

d) Hazardous Materials Sites

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?

Summary of 2020 General Plan FEIR

The Prior FEIR did not directly address impacts pertaining to being located on hazardous materials sites. However, the General Plan FEIR mentioned that the Napa County Department of Environmental Management implements an underground storage tank program. The Prior FEIR further identified approximately 100 sites within the County that have contained leaking or contaminated USTs and some former tannery sites underlain by contaminated soils. Furthermore, the Prior FEIR identified gasoline plants and stations along the Napa River that contain USTs storing petroleum products. As previously mentioned, the Napa County Department of Environmental Management requires facilities that store hazardous materials above the County's threshold to contain HMMPs, which are regularly reviewed and monitored by the agency. The Prior FEIR determined that the Department of Environmental Management would generate a ranking system to list facilities that generate hazardous materials on potential hazards and would therefore list the location of these facility sites.⁷⁰ As such, the Prior FEIR indicated that the 2020 General Plan references information that can pertain to hazardous material sites lists.

Proposed Project Analysis and Conclusion

The project site at 1687 El Centro Avenue was developed with the existing residence, agricultural equipment storage building, and a livestock shelter from at least 1942 until the present. Most of the project site has historically been used for pasture, except for the section south of Salvador Channel and section bordering 1687 El Centro Avenue which were planted with orchards. By 1973, some vineyards had been planted on the project site, and by 1982, all the land was planted with vineyards. The project site is not on the Cortese List.⁷¹ Therefore, impacts would be less than significant. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

⁷⁰ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Page 3.12-1 – Page 3.12-3. December 1.

⁷¹ Department of Toxic Substances Control. 2022. EnviroStor. Website: https://www.envirostor.dtsc.ca.gov/public/map/?global_id=38330005. Accessed May 7, 2025.

e) Airports

Would the project: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

Summary of 2020 General Plan FEIR

The Prior FEIR identified the Napa County Airport Land Use Compatibility Plan (ALUCP) planning area to encompass most of the Stanly Ranch Planning Area and the southern portion of the River East Planning Area. The purpose of the ALUCP is to address land use measures to minimize public exposure to safety and noise hazards around airports. As such, the Prior FEIR determined that Policy HS-6.1 within the 2020 General Plan would require any development implemented within the ALUCP planning area to be reviewed by the Airport Land Use Commission (ALUC), which would restrict certain development and impose safety standards to ensure consistency with the ALUCP. Therefore, the Prior FEIR concluded that the 2020 General Plan would be consistent with the environmental policies of the ALUCP and would not result in future development that exposes people to safety hazards or excessive noise.⁷² Therefore, the Prior FEIR concluded that impacts would be less than significant.

Proposed Project Analysis and Conclusion

The closest public airport to the project site is the Napa County Airport, located approximately 8.23 miles to the south. The project site does not fall within the Airport Influence Area of the Napa County Airport or any other airport.⁷³ Given the distance of the project site from local airports and applicable air traffic and safety regulations, no impacts would occur with respect to aviation safety hazards. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

f) Emergency Response and Evacuation

Would the project: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Summary of 2020 General Plan FEIR

The Prior FEIR identified policies in the 2020 General Plan within Chapter 8, Health and Safety, that are intended to maintain and enhance emergency preparedness and response, including the prolongation of emergency response plans, identification of evacuation routes, and rehearsal of those procedures established in the Disaster Management Plan. As such, the Prior FEIR explained policies

⁷² City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Page 3.2-9. December 1.

⁷³ Napa County Airport Land Use Commission (ALUCP). 1999. Napa County Airport Land Use Compatibility Plan. Website: <https://www.countyofnapa.org/DocumentCenter/View/1980/Airport-Land-Use-Compatibility-Plan-PDF>. Accessed May 7, 2025.

established in the 2020 General Plan where future development would not impair or interfere with emergency response or evacuation plans. Therefore, the Prior FEIR concluded that impacts would be less than significant.

Proposed Project Analysis and Conclusion

The proposed project would not alter or obstruct adjacent roadways. Temporary lane restrictions along El Centro Avenue may be required during construction. All such restrictions would require approval by the police and fire departments and would be temporary. As such, implementation of the proposed project would not be expected to impair the function of emergency evacuation routes. Napa County Office of Emergency Services (OES) coordinates emergency preparedness plans throughout the County, including the City of Napa. Development of the project site under the proposed project would not physically interfere with an adopted emergency response or evacuation plan. Lane restrictions during construction would consist of cones or temporary barricades that could easily be removed if evacuation of the area were required. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

g) Wildland Fires

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

Summary of 2020 General Plan FEIR

The Prior FEIR indicated that development associated with the 2020 General Plan could increase wildland fire hazards through development along hillsides within the wildland urban interface where the presence of dense vegetation patterns provides fuel for wildland fires. However, the Prior FEIR determined that the 2020 General Plan reflects measures, which are also included in Policy Resolution No. 27, on reducing wildland fire impacts to future developments, such as requiring fuel breaks and defensible space practices around structures and providing on-site water supply. As such, the Prior FEIR concluded that the 2020 General Plan would mitigate wildland fire impacts for future developments.⁷⁴ Therefore, the Prior FEIR concluded that impacts would be less than significant.

Proposed Project Analysis and Conclusion

As discussed in Section 2.19, Wildfire, the project site is not located within a very high fire hazard zone.⁷⁵ In addition, the project site is located on a relatively flat site within an urbanized and residential area of the City. The project site is located in an area that is mostly surrounded by other residential development, which reduces wildfire risks. The proposed project is required to design

⁷⁴ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Page 4-8. December 1.

⁷⁵ California Department of Forestry and Fire Protection (CAL FIRE). 2022. Fire Hazard Severity Zone (FHSZ) Viewer. Website: https://experience.arcgis.com/experience/03beab8511814e79a0e4eabf0d3e7247/?print_preview=true. Accessed May 7, 2025.

and construct internal access and to size and site fire suppression facilities (e.g., hydrants and sprinklers) to conform to the local, State, and federal regulations, further reducing the risk of wildfires. Therefore, impacts would be less than significant. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

Applicable 2020 General Plan FEIR Mitigation Measures

None required.

Conclusion

With regard to Hazards and Hazardous Materials, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. There is no new information of substantial importance, change in the proposed project, or change in the circumstances under which it would be undertaken identifying new significant effects, nor is there a substantial increase in the severity of previously identified impacts. The conclusions from the Prior FEIR remain unchanged when considering the implementation of the proposed project.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.10 Hydrology and Water Quality					
Would the project:					
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	Less than significant impact	No	No	No	No
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	Less than significant impact	No	No	No	No
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;	Less than significant impact	No	No	No	No
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	Less than significant impact	No	No	No	No
(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	Less than significant impact	No	No	No	No

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
(iv) impede or redirect flood flows?	Less than significant impact	No	No	No	No
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	Less than significant impact	No	No	No	No
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	Less than significant impact	No	No	No	No

a) Water Quality

Would the project: Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Summary of 2020 General Plan FEIR

The Prior FEIR provided existing water quality conditions in the Napa River at the time the 2020 General Plan was prepared, indicating that water quality objectives are mostly satisfied for the Napa River and Napa Valley's groundwater. However, the Prior FEIR identified that the groundwater contained high levels of sodium, boron, chloride, and iron. The Prior FEIR determined that development associated with the 2020 General Plan would result in minimal stormwater runoff and pollutant loading as most of the land in the RUL is already urbanized. Nevertheless, the Prior FEIR identified policies within the 2020 General Plan intended to reduce impacts related to water quality, such as Policy CS-11.5, through which the City plans to create stormwater management programs to reduce pollution discharges that would be consistent with the RWQCB Basin Plan. Furthermore, the 2020 General Plan requires new developments to obtain NPDES permits and to implement site-specific BMPs into their stormwater systems, and the City's Policy Resolution No. 27 supports these policies by requiring construction activities to minimize surface and groundwater pollution, to properly store construction materials to prevent water pollution, and to obtain permits from the RWQCB. As such, the Prior FEIR concluded that potential pollutant loading would be less than significant with implementation of the 2020 General Plan.⁷⁶

⁷⁶ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Page 3.9-1 – 3.9-4. December 1.

Proposed Project Analysis and Conclusion

The proposed project would include a total of 199,285 square feet of new and replaced impervious surface area at the project site (including El Centro Avenue half street frontage and Lassen Street frontage). The use of construction equipment at the project site could expose soil to erosion, which could result in potential pollutants being released into the environment. Runoff from graded areas could carry eroded soils and pollutants into the storm drainage systems and into Salvador Channel, eventually carrying these eroded soils and pollutants into the Napa River and then the San Pablo Bay, increasing sedimentation, degrading downstream water quality, and potentially affecting the groundwater table. This would represent a potentially significant construction impact related to surface and groundwater quality.

As the proposed project would disturb 1 acre or more of land, it would be subject to the State Water Board NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (General Permit) (Order WQ 2022-0057-DWQ, NPDES No. CAS000002). Permittees under the NPDES General Permit are required to prepare and implement a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP would include a site map, describe construction activities and potential pollutants, and identify site-specific BMPs that would be implemented to reduce and prevent soil erosion and discharge of other construction-related pollutants (i.e., petroleum products, solvents, paints, and cement) that could contaminate nearby water resources (i.e., the Napa River). The SWPPP also requires the description of a spill and leak prevention and response plan to address hazardous and nonhazardous spills in accordance with federal, State, and local laws. NPDES permittees are subject to inspection, monitoring, and reporting requirements.

Additionally, projects within the City must comply with the NPDES General Permit for Waste Discharge Requirements (WDRs) for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (MS4s) (MS4 Permit),⁷⁷ which is enforced through the Napa Countywide Stormwater Pollution Prevention Program (NCSPPP).

In compliance with the MS4 Permit, a Stormwater Control Plan was prepared by RSA+ on September 15, 2023, for the proposed project (Appendix F). As discussed in the Stormwater Control Plan, four bioretention facilities would be constructed to retain and treat stormwater prior to discharge from the project site. Runoff would be conveyed to the bioretention facilities from roof downspouts and surface flows from the street. Once in the bioretention facilities, runoff would be treated via infiltration together with the pollutant retention capabilities of the landscaping. The bioretention facilities would be designed to trap trash particles that are 5 millimeters and greater for the peak flow rate generated by the 1-year, 1-hour storm event; this feature allows the bioretention facilities to also function as Multi-benefit Trash Treatment Systems, in accordance with State Water Board standards. Adherence to the NPDES General Permit, the MS4 Permit, and the Stormwater Control Plan would reduce the potential

⁷⁷ Order WQ 2013-0001-DWQ, NPDES No. CAS000004 (As amended by Order WQ 2015-0133-EXEC, Order WQ 2016-0069-EXEC, Order WQ 2017-XXXX-DWQ, Order WQ 2018-0001-EXEC, and Order WQ 2018-0007-EXEC). Effective January 1, 2019.

for construction activities to introduce pollutants into the nearby waterways. The construction-related impact to surface water and groundwater quality would be less than significant.

The permit also requires post-construction permanent BMPs, in the form of Site Design and LID Runoff requirements, which would remain in service to protect water quality throughout the life of the proposed project. The bioretention facilities described above (and in Appendix F) have been designed to comply with the MS4 Permit and would be in place during operation of the proposed project. Adherence to the NPDES General Permit, the MS4 Permit, and the Stormwater Control Plan would reduce the potential for operational activities to introduce pollutants into the nearby waterways. The potential operational impacts to surface water and groundwater quality would be less than significant. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

b) Groundwater

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?

Summary of 2020 General Plan FEIR

The Prior FEIR determined that future development associated with implementation of the 2020 General Plan would not interfere with groundwater recharge as undeveloped land in the RUL accounts for approximately 1.62 square miles of the watershed's 426 square miles. As such, the Prior FEIR determined that future developments on undeveloped land that introduce impervious surfaces would have a nominal impact on groundwater recharge within the basin. Therefore, the Prior FEIR concluded that development projects from the implementation of the 2020 General Plan would not interfere with groundwater supplies and impacts would be less than significant.⁷⁸

Proposed Project Analysis and Conclusion

Impacts related to groundwater supply and groundwater recharge are limited only to operational impacts, and no construction-related impacts would occur.

The proposed project would increase impervious surfaces by approximately 173,088 square feet, for a total of approximately 199,285 square feet of new and replaced impervious surface area at the project site. This would reduce the project site's capacity for groundwater recharge; however, because of the proposed increase in impervious surface at the project site, a Stormwater Control Plan was prepared (Appendix F). As discussed above, runoff from the project site would be conveyed to bioretention facilities from roof downspouts and surface flows from the street. Once in the bioretention basin, runoff would be retained and allowed to percolate to support recharge of groundwater.

⁷⁸ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Page 3.9-1 – 3.9-4. December 1.

As discussed further in Section 4.18, Utilities and Service Systems, the City relies on a combination of local surface water, a small amount of recycled water, and imported water from the North Bay Aqueduct system, which sources water primarily from the Sacramento River, to meet its water needs, and, as such, the City does not rely upon groundwater to meet its municipal water needs. The 2020 Urban Water Management Plan (UWMP) describes the City's plans to meet full service demands under all foreseeable hydrologic conditions, meeting a single dry year and multiple dry year eligibility. The UWMP includes the City's Water Shortage Contingency Plan, which contains demand reduction measures that can be used in the event that water supplies fall below the City's existing demand. For example, measures could include limiting landscape irrigation to specific days, requiring automatic shutoff hoses, and restricting water use for decorative water features like fountains. City demands are projected to be met with local surface water, imported water, and recycled water supplies with available State Water Project (SWP) surplus supplies.⁷⁹ As such, the proposed project's water demand would be accommodated in multiple dry-year scenarios.

As the development associated with the proposed project would not substantially deplete groundwater supplies, nor would it interfere with groundwater recharge, the impact would be less than significant. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

c) Drainage

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;**

Summary of 2020 General Plan FEIR

The Prior FEIR identified natural drainageways within the RUL, such as Napa River, Napa Creek, Browns Valley Creek, and Redwood Creek. As previously mentioned, the Prior FEIR determined that implementation of the 2020 General Plan would result in minimal alterations to existing drainage patterns as the RUL is highly urbanized with many areas already covered with impervious surfaces. However, the Prior FEIR ascertained that the 2020 General Plan contains policies and implementation programs addressing alterations to existing drainage patterns from erosion or siltation, including Policies CS-11.6, which requires new developments to obtain an NPDES permit, and CS-11.7, which requires new developments to implement BMPs in the design of stormwater systems. In addition, new developments would be required to adhere to Policy Resolution No. 27, which mandates construction activities to be implemented in a manner that minimizes pollutants. Therefore, the Prior FEIR concluded that the 2020 General Plan contains policies and implementation

⁷⁹ City of Napa. 2022. 2020 Urban Water Management Plan. Final Report. January 2022.

programs that would not substantially alter the existing drainage patterns and impacts would be less than significant.⁸⁰

Proposed Project Analysis and Conclusion

The proposed project would have a significant impact if it were to substantially alter the existing drainage pattern of the project site in a manner that would result in substantial erosion or siltation. Such drainage effects could occur from grade changes at the site, exposure of soils for periods of time during precipitation events, alterations to creek beds, or increased on-site impervious areas. These types of changes could have a potentially significant impact on project site drainage patterns.

There is a possibility that construction activity could result in substantial erosion or siltation and could therefore result in drainage alterations and stormwater quality issues. However, as discussed above, the proposed project would be required to adhere to the San Francisco Bay RWQCB Municipal Regional Permit (MRP) and NPDES General Permit, which would include implementation a SWPPP and associated BMPs (including implementing sediment and erosion control plans, slope stabilization [to minimize exposed soil], and managing construction material and waste on-site by keeping storm drain systems clear) designed to ensure that erosion and siltation are prevented or minimized to the maximum extent feasible during construction.

Adherence to the NPDES General Permit and MS4 Permit would reduce the potential for construction activities to increase the rate and amount of erosion, siltation, and runoff. The impact would be less than significant.

As discussed above, the proposed project would include a total of 199,285 square feet of new and replaced impervious surface area at the project site (including El Centro Avenue half street frontage and Lassen Street frontage). The addition of impervious surface area could increase the rate of erosion and siltation and surface runoff at the project site. This would represent a potentially significant impact if the increase in impervious surface at the project site resulted in an increase in erosion and siltation at the project site during the operation of the proposed project. The natural drainage at the project site consists of sheet flow over the ground surface that concentrates in manufactured surface drainage elements (i.e., ditches, gutters, and on-site storm drain). The LID design features provided in the Stormwater Control Plan include preserving the natural drain features. As discussed above, the proposed project would include the addition of bioretention areas at the project site, which would be operational post-construction phase. These bioretention areas are designed to control the amount and rate of runoff at the project site by directing runoff into the bioretention areas. The inclusion of these on-site bioretention areas would ensure that the pre-development drainage patterns at the project site are not altered in such a way that the proposed project would result in increased erosion, siltation, and/or runoff. The impact would be less than significant. Therefore, the proposed project does not have any project-specific significant effects

⁸⁰ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Page 3.9-1 – 3.9-4. December 1.

which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

- (ii) **substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;**

Summary of 2020 General Plan FEIR

As previously mentioned, the Prior FEIR indicated that the increase in impervious surfaces from future development associated with the implementation of the 2020 General Plan would result in minimal surface runoff due to the RUL already being highly urbanized and would be less than significant. Regardless, the Prior FEIR identified policies and implementation programs in the 2020 General Plan intended to reduce surface runoff, such as Policy CS-11.4, which calls for investigating the potential for impact fee collection from new developments to accommodate the effects of additional surface runoff. In addition, Policy Resolution No. 27 would require new projects that introduce impervious surfaces potentially changing the amount of surface runoff to submit a drainage and grading plan. As such, the Prior FEIR concluded that impacts related to surface runoff from the implementation of the 2020 General Plan would be less than significant.⁸¹

Proposed Project Analysis and Conclusion

The proposed project would have a significant impact if it were to substantially alter the existing drainage pattern of the project site in a manner that would result in an increase in surface runoff, leading to flooding on- or off-site. Such drainage effects could occur from grade changes at the site, exposure of soils for periods of time during precipitation events, alterations to creek beds, or increased on-site impervious areas.

The proposed project would include a total of 199,285 square feet of new and replaced impervious surface area at the project site (including El Centro Avenue half street frontage and Lassen Street frontage). The addition of impervious surface area could increase the rate and amount of surface runoff and flooding at the project site. According to the Flood Insurance Rate Map (FIRM), published by FEMA, the project site is within the 100- and 500-year floodplain.⁸²

The Stormwater Control Plan (Appendix F) includes flood management design features included as part of the proposed project to reduce the potential flood hazard. The Hydraulic Analysis (Appendix G) prepared for the proposed project concluded that these design features would successfully reduce potential flood risks at the project site. These design features involve elevating portions of the project site above the 100-year flood elevation. The addition of bioretention areas at the project site is also included as part of the proposed project to ensure that the proposed post-development flow discharge from the project site would not exceed pre-developed levels. The addition of these proposed project

⁸¹ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Page 3.9-1 – 3.9-4. December 1.

⁸² Federal Emergency Management Agency (FEMA). 2010. FEMA Flood Insurance Rate Map. Map No. 06055C0504F. Panel 500 of 650. National Flood Insurance Program. Map. Scale. 1:6,000.

design features would reduce the amount of surface runoff from the project site and, therefore, reduce the risk of flooding as a result of the proposed project.

Furthermore, the Review of the Hydraulic Analysis (Appendix F) shows that the hydraulic modeling approach was carefully prepared and addresses the potential impacts and mitigation of flood events. Therefore, the proposed improvements included as part of the proposed project would be sufficient to address the potential for flooding and ensure that homes and structures would be protected. The impact would be less than significant. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

- (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;**

Summary of 2020 General Plan FEIR

The Prior FEIR determined that development associated with the implementation of the 2020 General Plan would result in a less than significant amount of water runoff volumes and pollutant loading. Nonetheless, the Prior FEIR outlined policies and implementation programs intended to reduce the impacts of new developments on stormwater drainage systems, such as Policy CS-11.2 and Policy CS-11.4, requiring the collection of Stormwater System Service fees to maintain and improve the existing storm drainage system and looking into the potential for impact fee collection to accommodate for additional runoff generated from new developments. Furthermore, Policy CS-11.5 emphasizes that the City intends to develop stormwater management programs to reduce waterborne pollution discharges. As such, the Prior FEIR identified policies and implementation programs within the 2020 General Plan intended to minimize water and pollution runoff in proposed or existing stormwater drainage systems. Therefore, the Prior FEIR concluded that impacts related to existing or planned stormwater drainage systems would be less than significant.⁸³

Proposed Project Analysis and Conclusion

The proposed project would have a significant impact if it were to substantially alter the existing drainage pattern of the project site in a manner that would result in substantial runoff, resulting in the exceedance of the existing stormwater drainage system or additional sources of polluted runoff. Such drainage effects could occur from grade changes at the site, exposure of soils for periods of time during precipitation events, alterations to creek beds, or increased on-site impervious areas.

As discussed above, the proposed project would include a total of 199,285 square feet of new and replaced impervious surface area at the project site (including El Centro Avenue half street frontage and Lassen Street frontage). The addition of impervious surface area could increase the rate and amount of surface runoff at the project site.

⁸³ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Page 3.9-1 – 3.9-4. December 1.

The LID design features provided in the Stormwater Control Plan include preserving the natural drain features. As discussed above, the proposed project would include the addition of bioretention areas at the project site, which would be operational post-construction phase. These bioretention areas are designed to control the amount and rate of runoff at the project site by directing runoff into the bioretention areas. The inclusion of these on-site bioretention areas would ensure that the pre-development drainage patterns at the project site are not altered in such a way that the proposed project would result in increased runoff. The storm drain system of the proposed project would be designed such that the proposed post-development flow discharge from the project site would not exceed pre-developed levels in accordance with the City Drainage Standards. The proposed project would satisfy the City Drainage Design Standard Section 2.10.02. The impact would be less than significant.

Additionally, as discussed above, adherence to the NPDES General Permit and MS4 Permit would reduce the potential for construction activities to increase the rate and amount of erosion, siltation, and runoff. The impact would be less than significant. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

(iv) impede or redirect flood flows?

Summary of 2020 General Plan FEIR

As previously mentioned, the Prior FEIR indicated that the RUL is highly urbanized and determined that the extension or introduction of any impervious surfaces would add minimal runoff volumes. However, the Prior FEIR identified policies and implementation programs in the 2020 General Plan that would reduce impacts pertaining to the alteration of existing drainage patterns impeding or redirecting flood flows, such as Policies CS-11.6 and CS-11.7, requiring new developments to establish BMPs through the obtainment of a NPDES permit for the construction of their stormwater systems. Additionally, Policy NR-1.4 requires future waterway improvement projects within 100 feet of a waterway to be reviewed to minimize impacts on natural drainageways such as riparian and aquatic habitats, and Implementation Program NR-1.E requires that sensitive construction practices be implemented to reduce erosion and sedimentation, protect riparian areas and native vegetation, and maintain unobstructed drainageways. Therefore, the Prior FEIR concluded that the 2020 General Plan identified policies and implementation programs intended to minimize impacts pertaining to impeding or redirecting flood flows and concluded that the 2020 General Plan would have less than significant impacts related to altering drainage patterns which could impede or redirect flood flows.⁸⁴

Proposed Project Analysis and Conclusion

The proposed project would have a significant impact if it were to substantially alter the existing drainage pattern of the project site in a manner that would result in impeding or redirecting flood

⁸⁴ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Page 3.9-1 – 3.9-4. December 1.

flows. Such drainage effects could occur from grade changes at the site, exposure of soils for periods of time during precipitation events, alterations to creek beds, or increased on-site impervious areas.

The proposed project would include a total of 199,285 square feet of new and replaced impervious surface area at the project site (including El Centro Avenue half street frontage and Lassen Street frontage). The addition of impervious surface area could increase the rate and amount of surface runoff at the project site. According to the FIRM, published by FEMA, the project site is within the 100- and 500-year floodplain which delineates an area that has a 1 percent and 0.2 percent chance of experiencing a flood event, respectively. The increase in impervious surfaces on the project site could increase flood related impacts during a flood event; however, the proposed project would implement a Stormwater Control Plan to reduce impacts of flooding during project operation.

The Stormwater Control Plan (Appendix F) includes flood management design features included as part of the proposed project to reduce the potential flood hazard, such as use of permeable pavers, dispersal of runoff to pervious areas, and use of bioretention facilities. The Hydraulic Analysis (Appendix F) prepared for the proposed project concluded that these design features would successfully reduce potential flood risks at the project site. These design features involve elevating portions of the project site above the 100-year flood elevation. The addition of bioretention areas at the project site is also included as part of the proposed project to ensure that the proposed post-development flow discharge from the project site would not exceed pre-developed levels. The addition of these proposed project design features would reduce the amount of surface runoff from the project site and, therefore, reduce the risk of flooding as a result of the proposed project. The impact would be less than significant. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

d) Risk of Pollutant Release Due to Inundation

Would the project: In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Summary of 2020 General Plan FEIR

The Prior FEIR referenced historical flood events associated with the Napa River and located areas with flood hazard conditions within the City, mostly comprised of areas along the Napa River and its tributaries. These areas are within a 100-year floodplain as designated by FEMA. As such, future development associated with the implementation of the 2020 General Plan could be located within a 100-year floodplain, which puts future development at risk of inundation potentially leading to pollutant release. However, the General Plan FEIR identified policies within the 2020 General Plan, such as Policy HS-3.3, which would ensure continued participation in FEMA's flood insurance program, and Policy HS-3.1, which recommends continued floodplain management intended to protect development situated in the 100-year floodplain. Furthermore, Policy Resolution No. 27 requires developments along the Napa River and its tributaries that are susceptible to flooding to obtain Certifications of Compliance from an architect or civil engineer indicating compliance with the

Public Works Department's flood zone development requirements and requires construction projects to properly store hazardous materials that could result in water pollution. As such, the Prior FEIR concluded that the 2020 General Plan contains policies and implementation programs that would minimize flood hazards and prevent the release of pollutants from project inundation and impacts would be less than significant.⁸⁵

Proposed Project Analysis and Conclusion

While the project site is within a seismically active region, the location is inland (approximately 35 miles east of the Pacific Ocean and approximately 14 miles northeast of San Pablo Bay) and there are no large bodies of water in proximity to the project site. As such, the project site would not be at risk of inundation from a tsunami or seiche. As discussed above, the project site is within the 100-year and 500-year floodplain.

Construction activity would be expected to involve the transport, use, and disposal of hazardous materials, such as diesel fuels, aerosols, and paints, which are typical for residential construction projects. Transport, use, and disposal of hazardous materials can increase the risk of accident conditions that could involve the likely release of hazardous materials into the environment. However, the use of these materials at the project site would be limited to construction of the proposed project and would not be stored at the project site after construction is complete. Although inundation by flood water would be unlikely during construction, the proposed project would still comply with the NPDES General Permit and MS4 Permit. As discussed above, the NPDES General Permit would require a SWPPP and associated BMPs, which would include measures that would reduce the potential for pollutants to be released into the environment. As the proposed project would develop a subdivision, there would be no hazardous materials stored on-site during operation of the proposed project. Therefore, the risk of releasing pollutants due to inundation at the project site would be less than significant. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

e) Water Quality Control or Sustainable Groundwater Management Plans Consistency

Would the project: Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Summary of 2020 General Plan FEIR

The Prior FEIR did not directly address impacts pertaining to conflicting or obstructing water quality control or sustainable groundwater management plans. However, the Prior FEIR identified policies and implementation programs within the 2020 General Plan that would reduce impacts to surface and groundwater quality. These policies include Policy CS-11.5, directing the City to develop stormwater management programs intended to reduce waterborne pollution discharges consistent with requirements established by the RWQCB's Basin Plan, and Policies CS-11.6 and 11.7, requiring

⁸⁵ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Page 3.9-1 – 3.9-4. December 1.

projects to obtain NPDES permits and implement site-specific BMPs for stormwater systems. Future development would also be required to abide by the City's Policy Resolution No. 27, which requires construction activities to minimize pollutants entering the stormwater system or groundwater basin. Furthermore, the Prior FEIR determined that the introduction of additional impervious surfaces within the RUL from the implementation of the 2020 General Plan would only result in minimal amounts of runoff volumes, potential pollutant loading, and interference with groundwater recharge due to the RUL's already highly urbanized setting. As such, existing environmental conditions and policies and implementation programs within the 2020 General Plan would prevent conflicting or obstruction of water quality control and sustainable groundwater management plans. Therefore, the Prior FEIR concluded that impacts would be less than significant.⁸⁶

Proposed Project Analysis and Conclusion

The proposed project would be in compliance with the Porter-Cologne Water Quality Control Act (Porter-Cologne Act), the State's statutory authority for the protection of water quality. The Porter-Cologne Act requires the adoption of water quality policies and plans that protect the State's waters. In this case, the San Francisco Bay RWQCB is responsible for the project site, and the proposed project is consistent with the San Francisco Bay RWQCB MRP and the NPDES General Permit as described above. Additionally, the proposed project would include bioretention basins, consistent with the Stormwater Control Plan, NPDES General Permit, and MS4 Permit. As such, the proposed project would be in compliance with the Porter-Cologne Act. Therefore, the proposed project would not conflict with a water quality control plan.

The project site is within the Napa Valley subbasin of the larger Sonoma-Napa Valley Groundwater Basin. The Napa Valley subbasin is managed by the Napa Valley Subbasin Groundwater Sustainability Plan (GSP). The Napa Valley Subbasin GSP has six sustainability goals that involve avoiding negative effects related to groundwater. These effects include chronic lowering of groundwater levels, reduction of groundwater storage, significant seawater intrusion, groundwater contamination, land subsidence, and depletion of surface water supplies. The proposed project would not cause seawater intrusion, land subsidence, or depletion of surface waters. The proposed project would not include groundwater extraction or result in a reduction in storage. The inclusion of bioretention areas at the project site would allow for increased water infiltration on the project site and ensure that such water is filtered before entering any groundwater. This would ensure the proposed project is consistent with sustainability goals in the Napa Valley Subbasin GSP, including the goals to manage groundwater to ensure sustainable supplies and to protect groundwater from contamination.⁸⁷ As such, the proposed project would not conflict with or obstruct a water quality management plan or the Napa Valley Subbasin GSP. Compliance with the Napa Valley Subbasin GSP would also ensure compliance with the Sustainable Groundwater Management Act (SGMA), as the Napa Valley Subbasin GSP was developed consistent with the SGMA. As such, the impact would be less than significant. Therefore, the proposed project does not have any project-specific significant

⁸⁶ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Page 3.9-1 – 3.9-4. December 1.

⁸⁷ Napa County. 2022. Napa Valley Subbasin Groundwater Sustainability Plan, Section 9 – Sustainable Management Criteria. January.

effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

Applicable 2020 General Plan FEIR Mitigation Measures

None required.

Conclusion

With regard to Hydrology and Water Quality, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. There is no new information of substantial importance, change in the proposed project, or change in the circumstances under which it would be undertaken identifying new significant effects, nor is there a substantial increase in the severity of previously identified impacts. The conclusions from the Prior FEIR remain unchanged when considering the implementation of the proposed project.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.11 Land Use and Planning <i>Would the project:</i>					
a) Physically divide an established community?	Not Applicable	No	No	No	No
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?	Less than significant impact	No	No	No	No

a) Division of an Established Community

Would the project: Physically divide an established community?

Summary of 2020 General Plan FEIR

This checklist question was not included in the Prior FEIR. No conclusion was made in the Prior FEIR regarding the significance level of impacts related to the 2020 General Plan potentially dividing an established community. However, the Prior FEIR determined that future commercial, residential, and industrial development in the City would be compatible with existing commercial, residential, and industrial development within the RUL and identified various policies in the 2020 General Plan which would emphasize infill development and ensure that new development would be compatible with surrounding development. These policies include Policy LU-4.1 and LU-4.5, which require that new residential development to be consistent with the existing neighborhood typology; Policy LU-4.9, which aims to eliminate incompatible uses through targeted code enforcement; Policy LU-5.4 and LU-5.6, which permit the expansion of commercial uses adjacent to non-commercial uses only where such use is compatible and would be appropriately buffered; Policy LU-7.2, which encourages industrial uses that are inappropriately located to be replaced and redeveloped with land uses consistent with the goals and standards of the General Plan; and Policy LU-7.4, which requires industrial development to be designed and operated to minimize nuisances on adjacent uses, such as noise, heat, glare, dust, and air emissions.⁸⁸

⁸⁸ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Page 3.2-3 – 3.2-4. December 1.

Proposed Project Analysis and Conclusion

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 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 an outlying area. The project site is in an urbanized and residential area. Surrounding land uses include single-family residential properties designated as LDR to the north, south, and east and multi-family residential properties on lands designated as HDR to the west.

Development of the proposed project would not disrupt the surrounding land uses or divide the physical arrangement of the established communities to the north, south, east, and west of the project site. The proposed project would redevelop what is currently private property into a residential neighborhood consistent with adjacent land. Additional access would be added to the site via internal sidewalks throughout the project site and along El Centro Avenue. Therefore, the proposed project would not physically divide an established community and would improve connectivity within the community. Impacts would be less than significant. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

b) Conflict with Applicable Land Use Plans, Policies, or Regulations

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?

Summary of 2020 General Plan FEIR

The Prior FEIR indicated that the RUL consists of mostly urbanized uses with residential uses being the most common land use, followed by parks and quasi-public, which includes City and County buildings, schools, utilities, public, parks, and recreational facilities. The RUL also comprises agricultural uses, which include underutilized and vacant sites scattered throughout the RUL where its urbanized environment precludes productive use of those agricultural lands. Lastly, commercial development in the RUL tends to be situated along major arterial roadways, and industrial uses consist of the lowest amount of land uses in the City and are mostly congregated in southern Napa. The Prior FEIR explained that implementation of the 2020 General Plan would result in the expansion of the RUL and encourage development on infill sites. As a result, future development associated with the implementation of the 2020 General Plan could result in potential land use conflicts and additional environmental effects. Although the Land Use section within the Prior FEIR primarily addressed design and intensity impacts pertaining to incompatibility with surrounding land uses, the Prior FEIR identified policies and implementation programs within the 2020 General Plan Land Use Element that would address environmental impacts of incompatible land uses, such as Policies LU-5.4 and LU-5.6, which require that new commercial uses adjacent to residential uses are consistent with the surrounding development and buffered from residential development. Additionally, tourist commercial land uses would be permitted only in areas where it would not impact existing residential, office, or

neighborhood commercial development. Furthermore, Policy LU-7.4 mandates future industrial development to be designed and operated to minimize nuisances that may impact adjacent uses, including noise, glare, and air emission impacts. The Prior FEIR also determined that the 2020 General Plan would be consistent with the ALUCP and the long-term UGB agreed upon by the County and City. As such, the Prior FEIR identified policies and implementation programs within the 2020 General Plan intended to reduce impacts related to conflicts with land use plans intended to avoid environmental impacts, and impacts would be less than significant.⁸⁹

Proposed Project Analysis and Conclusion

The project site has a land use designation of SFR-20 in the operative 2020 General Plan, which allows for housing densities ranging from 4 to 8 dwelling units per acre.⁹⁰ The proposed project would have a housing density of approximately 5.33 dwelling units per acre, compliant with the land use designation.⁹¹ Building setbacks would include at least 20-foot front setbacks, 15-foot rear setbacks, and 5-foot and 10-foot side setbacks, consistent with zoning regulations, except for homes on Lots 19, 38, 39, 40, 49, 50, and 51, where a reduction to 5-foot side setbacks would be requested in accordance with Small Lot Development Standards.

The project applicant requests approval of a use permit for the use of Small Lot Development Standards for specific lots to achieve the required net density given the site constraints, including the required setbacks from Salvador Channel. Section 17.52.470 of the Municipal Code authorizes Small Lot Development Standards to be used for smaller lots sizes and frontages where the development is compatible with the neighborhood and dwellings are proportionate to lot size and meet the City's residential design guidelines.⁹² Small Lot Development Standards generally apply to Lots 8, 9, 10, 11, 12, 13, 14, 15, and 22. Additionally, seven lots (Lots 19, 38, 39, 40, 49, 50, and 51) are proposed as flag lots, meaning that they lie at the end of a long driveway.⁹³ Per Section 17.52.190 of the Municipal Code, guest parking is provided on the proposed driveways in lieu of on-street parking. With the approval of a use permit for the application of Small Lot Development Standards, the proposed project would be consistent with the land use and zoning of the project site. The proposed project would not conflict with any land use plan, policy, or regulation adopted for the purpose of mitigating an environmental effect. (For a discussion of the characteristics of noise and further information regarding the applicable noise regulatory framework, refer to the Noise impact discussion in Section 2.13 of this document.) As such, impacts would be less than significant. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

⁸⁹ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Page 3.2-3 – 3.2-9. December 1.

⁹⁰ City of Napa. 1998. Envision Napa 2020: City of Napa General Plan, Land Use. December 1.

⁹¹ Calculated by dividing 9.56 acres by 51 lots.

⁹² City of Napa. 2024. Municipal Code – Zoning. Website: <https://ecode360.com/43397584#43398432>. Accessed May 7, 2025.

⁹³ Ibid.

Applicable 2020 General Plan FEIR Mitigation Measures

None required.

Conclusion

With regard to Land Use and Planning, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. There is no new information of substantial importance, change in the proposed project, or change in the circumstances under which it would be undertaken identifying new significant effects, nor is there a substantial increase in the severity of previously identified impacts. The conclusions from the Prior FEIR remain unchanged when considering the implementation of the proposed project.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.12 Mineral Resources					
Would the project:					
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?	Not Applicable	No	No	No	No
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?	Not Applicable	No	No	No	No

a, b) Loss of Mineral Resources of Statewide or Local Importance

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?

Summary of 2020 General Plan FEIR

This checklist question was not included in the Prior FEIR. No conclusion was made in the Prior FEIR regarding the significance level of impacts related to the loss of a known mineral resource valuable to the region and the residence of the State.

Proposed Project Analysis and Conclusion

The Surface Mining and Reclamation Act (SMARA) of 1975 is the principal State law regarding mineral resources. SMARA limits development in areas that contain mineral resources with significant economic value and mandates Mineral Resource Zones (MRZs), classified into categories based on both geological and economic data. Major mineral resources found in the greater Bay Area include salines, sand and gravel, limestone and shells, stone, and oil and gas.

There are four classifications of MRZ to classify existing or potential mineral resource sites within areas of the State, and they are described as follows:

MRZ-1 Areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that there is little likelihood for their presence. This zone

shall be applied where the likelihood for occurrence of significant mineral deposits is nil or slight.

MRZ-2 Areas where adequate information indicates that significant mineral deposits are present or where it is judged that there is a high likelihood for their presence. This zone shall be applied to known mineral deposits or where the likelihood for occurrence of significant mineral deposits is high.

MRZ-3 Areas containing mineral deposits the significance of which cannot be evaluated from available data.

MRZ-4 Areas where available information is inadequate for assignment to any other MRZ zone.

There are no mineral resource recovery sites on the project site itself.⁹⁴

The State Board of Mining and Geology has adopted regulations to protect lands classified as MRZ-2 (lands where information indicates that significant stone, sand, and/or gravel deposits are present or where a high likelihood of their presence exists). The only area classified as MRZ-2 by the California Geological Survey (CGS) within the City is the Napa Quarry, located approximately 5.6 miles southeast of the project site. The project site lies in an area mapped as MRZ-3, which cannot be evaluated from available data. There are no mineral resource recovery sites on the project site itself.⁹⁵ Therefore, the proposed project would not result in a loss of known mineral resources, and no impact would occur. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

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?

Summary of 2020 General Plan FEIR

This checklist question was not included in the Prior FEIR. No conclusion was made in the Prior FEIR regarding the significance level of impacts related to the loss of a locally important mineral resource recovery site.

Proposed Project Analysis and Conclusion

The project site is not currently known to support any mineral extraction activities and is not identified as a locally important mineral resource recovery site by the General Plan. Therefore, the implementation of the proposed project would not result in the loss of local availability of a locally important mineral resource recovery site delineated in a local general plan, specific plan, or other land use plan. No impact would occur. Therefore, the proposed project does not have any project-specific

⁹⁴ California Geological Survey (CGS). 2013. Update of Mineral Land Classification: Aggregate Materials in the North San Francisco Bay Production-Consumption Region, Sonoma, Napa, Marin, and Southwestern Solano Counties, California.

⁹⁵ Ibid.

significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

Applicable 2020 General Plan FEIR Mitigation Measures

None required.

Conclusion

With regard to Mineral Resources, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. There is no new information of substantial importance, change in the proposed project, or change in the circumstances under which it would be undertaken identifying new significant effects, nor is there a substantial increase in the severity of previously identified impacts. The conclusions from the Prior FEIR remain unchanged when considering the implementation of the proposed project.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.13 Noise					
Would the project:					
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Less than significant impact	No	No	No	No
b) Generation of excessive groundborne vibration or groundborne noise levels?	Not Applicable	No	No	No	No
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 two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	Less than significant impact	No	No	No	No

a) Noise Levels in Excess of Adopted Standards

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?

Summary of 2020 General Plan FEIR

The Prior FEIR outlined areas within the City that generate major sources of noise. Traffic from the City's roadways tends to be the major contributor of ambient noise levels mostly associated with the

State highways that transect the City, along with major arterials that range from approximately 65 to roughly 80 A-weighted decibels (dBA) at 50-foot contours from the centerline of the roadway during free-flowing traffic moving at the established speed limits. Other sources of noise in the City consist of aircraft noise, heavy machinery associated with vineyard operations, diesel pumps, and the Wine Train. The Prior FEIR established compatibility guidelines as the threshold of significance for exposure to an exceedance in ambient noise levels and summarized whether the increase in vehicular traffic associated with the implementation of the 2020 General Plan would result in a noticeable increase in ambient noise levels. The Prior FEIR determined that residential land uses would not experience noise levels greater than the 70 Community Noise Level Equivalent (CNEL) and noise levels would not exceed those thresholds established in the compatibility guidelines. Regardless, the Prior FEIR indicated that the 2020 General Plan establishes policies in Chapter 8, Health and Safety, intended to minimize noise impacts for existing and new land uses. Policies HS-9.3, HS-9.12, and HS-9.5 implement strategies to reduce vehicle and traffic related noise impacts, including evaluation of the City's designated truck routes and enforcement of State muffler and exhaust laws, and Policies HS-9.1 and HS-9.13 require new developments to remain below the established thresholds for exterior and interior noise levels within the compatibility guidelines. Furthermore, Policies HS-9.7 and HS-9.14 take into consideration proper site planning techniques and building design strategies, which can be used to reduce noise impacts. As such, the Prior FEIR concluded that implementation of the 2020 General Plan would not result in exceeding standards established in the compatibility guidelines and, thus, would not substantially increase ambient noise levels for surrounding areas. Therefore, 2020 the General Plan FEIR concluded that impacts would be less than significant.

Proposed Project Analysis and Conclusion

Short-term Construction Impacts

A significant impact would occur if construction activities would result in the generation of a substantial temporary increase in ambient noise levels that would exceed City standards. The City's construction noise standards restrict construction activity to daytime hours and require best management noise reduction measures, as detailed in the regulatory discussion above. In addition, for the purposes of this analysis, a substantial temporary increase is a temporary increase that would result in annoyance or sleep disturbance of nearby sensitive receptors. While the City does not establish noise level thresholds for construction activities, this analysis uses the noise limits established by the Federal Transit Administration (FTA) to identify the potential for impacts due to substantial temporary construction noise. The FTA identifies construction noise limits in the Transit Noise and Vibration Impact Assessment Manual. During daytime hours, a significant temporary increase would be an increase in excess of the average daily noise levels of 80 dBA equivalent noise/sound level ($L_{eq(8-hour)}$) as measured at a receiving residential land use.

Noise impacts from construction activities associated with the proposed project would be a function of the noise generated by construction equipment, equipment location, sensitivity of nearby land uses, and the timing and duration of the construction activities.

Two types of short-term noise impacts could occur during the construction of the proposed project. First, construction crew commutes and the transport of construction equipment and materials to the project site would incrementally increase noise levels on access roads leading to the project site (vehicle engine noise, the sound of vehicle doors shutting, etc.). Although there would be a relatively high single-event noise exposure potential causing intermittent noise nuisance, the effect on longer-term (hourly or daily) ambient noise levels would be small. Therefore, short-term construction-related impacts associated with worker commute and equipment transport to the project site would be less than significant.

The second type of short-term noise impact is related to noise generated during construction on the project site. Construction is completed in discrete steps, each of which has its own mix of equipment and, consequently, its own noise characteristics. These various sequential phases would change the character of the noise generated on the project site and therefore, the noise levels surrounding the site 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.

The site preparation construction phase is expected to require the use of front-end loaders, compactors, hydraulic backhoes, and haul trucks. Typical operating cycles for these types of construction equipment may involve 1 or 2 minutes of full-power operation followed by 3 or 4 minutes at lower power settings. Impact equipment such as pile drivers is not expected to be used during the construction of the proposed project. Because the noisiest construction equipment is earthmoving equipment, the site preparation phase is expected to be the loudest phase of construction. A characteristic of noise is that each doubling of the sound sources with equal strength increases the noise level by 3 dBA. Assuming that each piece of construction equipment operates at some distance from the other equipment, the worst-case combined noise level during this phase of construction would be 90 dBA maximum noise/sound level (L_{max}) at a distance of 50 feet from an active construction area. The acoustical center reference is used because construction equipment must operate at some distance from one another on a project site, and the combined noise level as measured at a point equidistant from the sources (acoustic center) would be the worst-case maximum noise level. These operations would be expected to result in a reasonable worst-case hourly average of 86 dBA L_{eq} at a distance of 50 feet from the acoustic center of a construction area.

The closest sensitive receptor to the proposed areas of construction is a single-family residence on Moss Lane, southeast of the project site. The façade of this closest residence would be located approximately 40 feet from the acoustic center of construction activity where multiple pieces of heavy construction equipment would potentially operate at the project site. At this distance, worst-case construction noise levels could range up to approximately 87 dBA L_{max} , intermittently, and could have an hourly average of up to 85 dBA L_{eq} at the façade of the nearest single-family residential home if multiple pieces of equipment operate simultaneously at the nearest center of construction activity. These reasonable worst-case construction noise levels would only occur periodically throughout the day as construction equipment operates along the nearest project boundaries. Additionally, these noise levels would drop off at a rate of 6 dBA per doubling of distance as the equipment moves over

the project site. Therefore, the calculated reasonable worst-case 8-hour average noise level for construction assuming construction equipment moves over the project site would be 77 dBA $L_{eq(8-hour)}$ as measured at the nearest residential receptor. Therefore, these calculated reasonable worst-case construction noise levels would not exceed the FTA's average daily threshold of 80 dBA $L_{eq(8-hour)}$ as measured at the nearest residential receptors.

Aside from residential uses, the next closest sensitive receptor to the proposed areas of construction is Willow Elementary School located northeast of the project site. The façade of the closest building on the school campus is located approximately 360 feet from the acoustic center of construction activity where multiple pieces of heavy construction equipment would potentially operate at the project site. At this distance, worst-case construction noise levels could range up to approximately 68 dBA L_{max} , intermittently, and could have an hourly average of up to 60 dBA L_{eq} at the façade of the school if multiple pieces of equipment operate simultaneously at the nearest center of construction activity. These reasonable worst-case construction noise levels would only occur periodically throughout the day as construction equipment operates along the nearest project boundaries. Additionally, these noise levels would drop off at a rate of 6 dBA per doubling of distance as the equipment moves over the project site. Therefore, the calculated reasonable worst-case 8-hour average noise level for construction assuming construction equipment moves over the project site would be approximately 56 dBA $L_{eq(8-hour)}$ as measured at the school. Therefore, these calculated reasonable worst-case construction noise levels would not exceed the FTA's average daily threshold of 80 dBA $L_{eq(8-hour)}$ as measured at the nearest school receptor.

The proposed project would comply with the City's Municipal Code requirements restricting construction activity to the hours between 8:00 a.m. and 5:00 p.m. Monday through Friday and 8:00 a.m. to 4:00 p.m. on weekends and holidays, which would preclude the proposed project from resulting in any nighttime sleep disturbance of nearby sensitive receptors. In addition, the proposed project would comply with the best management noise reduction measures detailed in Section 8.08.025 of the Municipal Code, including ensuring that all muffler systems on construction equipment are properly maintained; that all construction equipment is not placed adjacent to developed areas unless said equipment is provided with acoustical shielding; and that all construction and grading equipment is shut down when not actively in use. These measures would further reduce construction noise levels below the reasonable worst-case noise level estimates identified above.

Therefore, the proposed project construction activities would not result in a substantial temporary increase in ambient noise levels in excess of established standards, and the impact would be less than significant.

Operational/Stationary Source Noise Impacts

A significant impact would occur if operational noise levels generated by stationary noise sources at the project site would result in a substantial permanent increase in ambient noise levels in excess the City's normally acceptable noise land use compatibility standard of 60 dBA CNEL for residential land uses.

Mechanical Equipment Operations

A reference noise level for typical residential mechanical ventilation systems was used. Noise levels from typical residential mechanical ventilation equipment are sound rated from 50 dBA to 70 dBA L_{eq} as measured at approximately 3 feet from the operating unit.

Mechanical ventilation systems could be located as close as 30 feet from the nearest off-site residential receptor. At this distance, noise generated by mechanical ventilation equipment would attenuate to less than 45 dBA L_{eq} at the nearest receiving residential property. Therefore, these noise levels would not exceed the City's normally acceptable noise land use compatibility standard of 60 dBA CNEL.

In addition, documented ambient noise levels at the border of the project site range from 48.2 L_{eq} to 62.6 L_{eq} . These noise measurements are documented in Appendix G. Therefore, the calculated reasonable worst-case mechanical ventilation equipment operational noise levels would not exceed the documented existing ambient noise levels.

Therefore, proposed mechanical ventilation equipment operational noise levels would not result in a substantial permanent increase in ambient noise levels in excess of the City's noise performance standards or exceed the documented ambient noise levels as measured at the nearest off-site residential property. Thus, noise impacts from proposed mechanical ventilation equipment operations would be less than significant.

Operational/Mobile Source Noise Impacts

A significant impact would occur if project-generated traffic would result in a substantial increase in excess of the City's noise land use compatibility standards. A characteristic of noise is that audible increases in noise levels generally refer to a change of 3 dBA or more, as this level has been found to be barely perceptible to the human ear in outdoor environments. A change of 5 dBA is considered the minimum readily perceptible change to the human ear in outdoor environments. Therefore, for purposes of this analysis, a significant impact would occur if project-related traffic would cause the CNEL along roadway segments in the project vicinity to increase by any of the following:

- 5 dBA or more even if the CNEL would remain below normally acceptable levels for a receiving land use.
- 3 dBA or more, thereby causing the CNEL in the project vicinity to exceed normally acceptable levels and result in noise levels that would be considered conditionally acceptable for a receiving land use.
- 1.5 dBA or more where the CNEL currently exceeds conditionally acceptable levels.

Documented ambient noise levels at the border of the project site ranges from 48.2 L_{eq} to 62.6 L_{eq} . These noise measurements are documented in Appendix G. Therefore, the applicable threshold for a substantial increase in traffic noise levels would be a 5 dBA or greater increase.

W-Trans conducted an Addendum to the Traffic Impact Study for the Zinfandel Estate Subdivision – VMT Analysis (Appendix H), which includes an evaluation of existing and future traffic noise conditions in the project vicinity.⁹⁶ According to the VMT Analysis prepared by W-Trans (Appendix H), the proposed project would generate 51 trips during the AM peak-hour and 67 trips during the PM peak-hour. However, the existing traffic on El Centro Avenue adjacent to the project site has 345 trips during the AM peak-hour and 241 trips during the PM peak-hour. Thus, the actual project increase in trips generated by the proposed project would not double the hourly average traffic volumes on this roadway segment and would result in a less than 1 dBA increase in traffic noise levels on any of the local roadways in the project vicinity.

Therefore, project traffic would not result in a substantial increase of 5 dBA or greater above ambient noise levels, and project-related traffic noise impacts on off-site receptors would be less than significant.

Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

b) Groundborne Vibration

Would the project result in: Generation of excessive groundborne vibration or groundborne noise levels?

Summary of 2020 General Plan FEIR

The Prior FEIR did not address impacts pertaining to excessive groundborne vibration or noise. No conclusion was made in the Prior FEIR regarding the significance level of impacts related to the project's potential of generating excessive groundborne vibrations or noise levels.

Proposed Project Analysis and Conclusion

A significant impact would occur if the proposed project would generate groundborne vibration or groundborne noise levels in excess of established standards. For determining construction-related vibration impacts, the FTA's Construction Vibration Impact Criteria are utilized. The FTA has established industry-accepted standards for vibration impact assessment in its Transit Noise and Vibration Impact Assessment Manual, dated September 2018.

Groundborne noise is generated when vibrating building components radiate sound or noise generated by groundborne vibration. In general, if groundborne vibration levels are do not exceed levels considered to be perceptible, then groundborne noise levels would not be perceptible in most interior environments. Therefore, this analysis focuses on determining exceedances of groundborne vibration levels.

⁹⁶ W-Trans. 2020. Addendum to the Traffic Impact Study for the Zinfandel Estate Subdivision – VMT Analysis. August 17.

In extreme cases, excessive groundborne vibration has the potential to cause structural damage to buildings. Common sources of groundborne vibration include construction activities such as blasting, pile driving and operating heavy earthmoving equipment. However, construction vibration impacts on building structures are generally assessed in terms of peak particle velocity (PPV). For purposes of this analysis, project-related impacts are expressed in terms of PPV.

Short-term Construction Vibration Impacts

A significant impact would occur if existing structures at the project site or in the project vicinity would be exposed to groundborne vibration levels in excess of levels established by the FTA's Construction Vibration Impact Criteria for the type of structure.

Of the variety of equipment used during construction, the small vibratory rollers that are anticipated to be used in the site preparation phase of construction would produce the greatest groundborne vibration levels. Small vibratory rollers produce groundborne vibration levels ranging up to 0.101 inch per second (in/sec) PPV at 25 feet from the operating equipment.

The nearest off-site receptor to the project site is the single-family home located northeast of the project site. The façade of this building would be located approximately 100 feet from the nearest construction footprint where the heaviest construction equipment would potentially operate. At this distance, groundborne vibration levels would range up to 0.012 PPV from operation of the types of equipment that would produce the highest vibration levels. This is below the FTA's Construction Vibration Impact Criteria of 0.2 PPV for buildings of nonengineered timber and masonry. Therefore, the impact of short-term groundborne vibration associated with construction to off-site receptors would be less than significant.

Operational Vibration Impacts

A significant impact would occur if the proposed project would generate excessive groundborne vibration levels at sensitive receptors in the project vicinity.

Implementation of the proposed project would not include any permanent sources that would expose persons in the project vicinity to groundborne vibration levels that could be perceptible without instruments at any existing sensitive land use in the project vicinity. In addition, there are no existing significant permanent sources of groundborne vibration in the project vicinity to which the proposed project would be exposed. Therefore, project operational groundborne vibration level impacts would be considered less than significant.

The proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

c) Airport or Private Airstrip Noise

Would the project result in: **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 two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?**

Summary of 2020 General Plan FEIR

As previously mentioned, the Prior FEIR identified aircrafts as one of the major sources of noise affecting the City. The Napa County ALUCP addresses land use measures to minimize exposure of potential future developments to safety hazards and excessive noise levels within its planning area, which encompasses most of the Stanly Ranch Planning Area and the southern portion of the River East Planning Area. The Prior FEIR highlighted policies within the 2020 General Plan intended to prevent exposure of individuals to excessive noise levels within an airport land use plans planning area, such as Policy HS-6.1, which requires future development implemented from the 2020 General Plan to undergo review by the Napa County ALUC, including restricting certain land uses and establishing proper safety standards to ensure consistency with the Napa County ALUCP. As such, the Prior FEIR concluded that the 2020 General Plan is consistent with those policies established in the Napa County ALUCP and would not expose individuals to excessive noise levels resulting in less than significant impacts.

Proposed Project Analysis and Conclusion

A significant impact would occur if the proposed project would expose people residing or working in the project area to excessive noise levels 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.

The project site is not located within the vicinity of a private airstrip. The nearest public airport to the project site is the Napa County Airport located approximately 8.23 miles south of the project site. The project site is located outside of the 60 dBA CNEL airport noise contours of this closest airport. While aircraft noise is occasionally audible on the project site from aircraft flyovers, aircraft noise associated with nearby airport activity would not expose people residing or working near the project site to excessive noise levels. Therefore, implementation of the proposed project would not expose persons residing or working in the project vicinity to noise levels from airport activity that would be in excess of normally acceptable standards for the proposed land use development, and no impact would occur.

Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

Applicable 2020 General Plan FEIR Mitigation Measures

None required.

Conclusion

With regard to Noise, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. There is no new information of substantial importance, change in the proposed project, or change in the circumstances under which it would be undertaken identifying new significant effects, nor is there a substantial increase in the severity of previously identified impacts. The conclusions from the Prior FEIR remain unchanged when considering the implementation of the proposed project.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.14 Population and Housing					
Would the project:					
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	Less than significant impact	No	No	No	No
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	Not Applicable	No	No	No	No

a) Growth Inducement

Would the project: Induce substantial 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)?

Summary of 2020 General Plan FEIR

The Prior FEIR determined that the City had a population of 69,640 individuals and 27,098 dwelling units in 1995. Population projections for 2020 indicated that the City would have a population of approximately 81,100 individuals and 34,938 dwelling units considering residential buildout within the RUL from the implementation of the 2020 General Plan.⁹⁷ The Prior FEIR discussed project impacts related to direct and indirect population growth within Section 4.3, Growth Inducing Impacts, and claimed that the 2020 General Plan includes a growth management strategy emphasizing continued reliance on future development within the RUL and ensuring the induced growth would not use up the City's remaining residential land supply before 2020. Furthermore, the Prior FEIR determined that implementation of the 2020 General Plan would be consistent with ABAG's regional growth projections.⁹⁸ Additionally, as the RUL is already highly urbanized, the 2020 General Plan would not

⁹⁷ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Page S-3. December 1.

⁹⁸ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Page 3.2-8 – 3.2-9. December 1.

result in the extension of any public services or utilities that could induce indirect population growth. Therefore, the Prior FEIR concluded that implementation of the 2020 General Plan would not induce direct or indirect substantial population growth, a less than significant impact.

Proposed Project Analysis and Conclusion

According to the United States Census Bureau, the average household size in the City is 2.58.⁹⁹ Given that the proposed project would result in the construction of 73 new units (including 51 single-family homes, 12 ADUs, and 10 junior ADUs), it can be conservatively assumed that the proposed project would generate up to 189 new residents.¹⁰⁰ This represents a nominal amount (0.24 percent) of the total City population, which currently amounts to approximately 77,492 persons.¹⁰¹ As such, the current City population is lower than that was projected by the Prior FEIR for 2020. Additionally, according to the City's Housing Element, the City's population is expected to increase to 90,288 by 2040.¹⁰² The proposed project is also consistent with the General Plan's land use designation of the project site, so the population growth of 189 new residents would be considered planned growth. Thus, the proposed project would not induce substantial unplanned population growth in the City, either through new housing or new businesses or indirectly through the extension of roads or other infrastructure. Therefore, a less than significant impact would occur. Thus, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

b) Displacement of Persons or Housing

Would the project: Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Summary of 2020 General Plan FEIR

This checklist question was not included in the Prior FEIR. No conclusion was made in the Prior FEIR regarding the significance level of impacts related to the project's potential to displace substantial numbers of existing people or housing, resulting in the construction of replacement housing elsewhere. However, the 2020 General Plan would increase residential uses within the City and would not result in any direct development that could displace existing people or housing.

Proposed Project Analysis and Conclusion

The project site currently contains one single-family residence, a detached garage, and a driveway connecting to El Centro Avenue. Development of the proposed project would involve the removal of existing trees, vineyards, one single-family residence, the detached garage, and a pedestrian bridge.

⁹⁹ United States Census Bureau. QuickFacts: Napa City, California. Website: <https://www.census.gov/quickfacts/fact/table/napacitycalifornia/HSG010222>. Accessed May 7, 2025.

¹⁰⁰ 2.58 persons per residential unit * 73 residential units = 188.34 persons

¹⁰¹ 189 new residents/77,492 existing population = 0.00243, or approximately 0.24 percent

¹⁰² City of Napa. 2015. Housing Element. June 16.

Considering the average household size in Napa in 2024, approximately 2.58 people would be displaced through the removal of the one existing residence.

The City currently contains approximately 1,594 vacant housing units.^{103,104,105} Accordingly, there are ample housing opportunities and the removal of the one residence would not represent a substantial displacement of people or housing. Moreover, the proposed project would result in the construction of new housing that could serve up to 189 people. Therefore, impacts would be less than significant. Thus, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

Applicable 2020 General Plan FEIR Mitigation Measures

None required.

Conclusion

With regard to Population and Housing, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. There is no new information of substantial importance, change in the proposed project, or change in the circumstances under which it would be undertaken identifying new significant effects, nor is there a substantial increase in the severity of previously identified impacts. The conclusions from the Prior FEIR remain unchanged when considering the implementation of the proposed project.

¹⁰³ The California Department of Finance (CDF) City/County Population and Housing Estimates show that there are 31,884 total housing units within the City of Napa, and the City has a vacancy rate of approximately 5 percent. Thus, there are approximately 1,594 vacant housing units within the City.

¹⁰⁴ California Department of Finance (CDF). 2024. Population and Housing Estimates for Cities, Counties, and the State — January 1, 2024 and 2025. Website: <https://dof.ca.gov/forecasting/demographics/estimates-e1/>. Accessed May 7, 2025.

¹⁰⁵ City of Napa. 2022. General Plan Update Environmental Impact Report (2040 General Plan EIR). March.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.15 Public Services <i>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>					
a) Fire protection?	Less than significant impact	No	No	No	No
b) Police protection?	Less than significant impact	No	No	No	No
c) Schools?	Less than significant impact	No	No	No	No
d) Parks?	Less than significant impact	No	No	No	No
e) Other public facilities?	Less than significant impact	No	No	No	No

a) Fire Protection

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:
Fire protection?

Summary of 2020 General Plan FEIR

The City of Napa Fire Department (NFD) provides fire protection and emergency services to the City of Napa. At the time the Prior FEIR was prepared, the NFD consisted of 46 personnel, 18 firefighter reserve positions, and three fire stations. The Prior FEIR indicated that the NFD attempts to maintain a 3-minute average response time for areas within a 1.5-mile radius of each station and a 5-minute response time limit for other locations within its service area. Furthermore, the Prior FEIR highlighted that the call volume increased by approximately 21 percent from 1988 to 1993, which was likely caused by population growth. As such, the Prior FEIR acknowledged that future development within

the RUL associated with the implementation of the 2020 General Plan would increase the demand for fire protection services. However, the Prior FEIR indicated that policies and implementation programs, such as Policies CS-5.1, which calls for the maintenance of personnel and equipment to provide necessary services for the City; Policy CS-5.6, which requests for supplying sufficient water supply available for firefighting throughout the community; and Policy CS-5.8, which ensures the continuation of established mutual aid agreements with the State and surrounding local departments, would reduce potential impacts. In addition, new developments anticipated from the implementation of the 2020 General Plan would adhere to Policy Resolution No. 27, which includes compliance with the Uniform Fire Code and NFD's established Standard Requirements for Commercial/Residential Projects, along with Municipal Code 15.78, which requires automatic sprinkler systems and payment of fire and paramedic fees. Therefore, the Prior FEIR concluded that implementation of the 2020 General Plan would not adversely affect emergency response times but did not directly address impacts pertaining to service ratios and performance objectives. The Prior FEIR concluded that impacts would be less than significant.^{106, 107}

Proposed Project Analysis and Conclusion

The NFD is a multi-hazard, all-risk response agency that provides emergency services to the citizens and visitors of the community, seeking to protect life, property, and the environment. NFD is divided into three divisions: Administration, Operations, and Prevention. The project site is served by NFD Station No. 3, located at 2000 Trower Avenue, which is approximately 2,084 feet southwest of the project site.

The proposed project would not substantially increase demand for fire protection services such that it would require new government facilities to be built or expanded because the proposed project is consistent with the project site's General Plan land use designation. As such, the proposed project is consistent with the population growth and uses assumed and planned for under the 2020 General Plan. Additionally, as described in Section 2.14, the proposed project would result in a nominal increase in the City's population, allowing NFD to maintain all applicable service goals. The close proximity of Station No. 3 would allow NFD to maintain its response time goal. Emergency access would be available via El Centro Avenue for the northern portion of the site and via Lassen Street for the southern portion of the site.

Furthermore, the proposed project would comply with all applicable requirements of the Municipal Code and Policy Resolution No. 27 related to fire protection, including installing automatic sprinkler systems in the proposed buildings, providing fire extinguishers and adequate site access, and paying development fees. Impacts would be less than significant. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

¹⁰⁶ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Page 3.4-1. December 1.

¹⁰⁷ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Page 3.4-6. December 1.

b) Police Protection

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: Police protection?**

Summary of 2020 General Plan FEIR

The Prior FEIR identified that the Napa Police Department (NPD) serves the City and consisted of a total of 66 sworn police officers and community service officers who patrol four beats within the City as of 1994. The NPD had an average response time for Priority I calls of 3 minutes and 45 seconds. Although the NPD maintained a response time below the established threshold, the Prior FEIR acknowledged that future development implementing the 2020 General Plan would increase the demand for police services, which could result in the need for new facilities. As such, the Prior FEIR highlighted Policy CS-2.2 from the 2020 General Plan, which calls for the police force to remain sufficiently staffed to continue to achieve response times within the five-minute threshold. Furthermore, most of the new developments associated with the implementation of the 2020 General Plan would be within the RUL and in already established beats, and those areas planned to be incorporated into the RUL would be feasibly accessible with major roadways in proximity to existing beats. Lastly, the NPD's Community Service Officers handle non-emergency calls, which allows the NPD to maintain acceptable service levels for high-priority tasks. As such, the Prior FEIR concluded that future developments implementing the 2020 General Plan would not adversely affect response times, service ratios, or performance objectives, and impacts would be less than significant.^{108, 109}

Proposed Project Analysis and Conclusion

Police protection services are provided to the project site by NPD. The NPD consists of approximately 76 sworn personnel and 71 professional staff. The department is divided into two main divisions: Operations and Administration/Support Services.¹¹⁰ Officers are dispatched from police headquarters located at 1539 First Street, approximately 2.97 miles southeast of the project site.

The proposed project would not substantially increase demand for police protection services or require new sworn officers, or new or expanded government facilities. As described in Section 2.14 and above, the proposed project is consistent with the project site's General Plan land use designation and would result in a nominal increase to the City's population, consistent with the growth assumed and planned for within the 2020 General Plan. The proposed project would also be required

¹⁰⁸ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Page 3.4-1. December 1.

¹⁰⁹ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Page 3.4-5 – 3.4-6. December 1.

¹¹⁰ City of Napa. Police Department. Website: <https://www.cityofnapa.org/323/Police->

Department#:~:text=The%20Napa%20Police%20Department%20was,week%2C%20365%20days%20a%20year.

Accessed May 7, 2025.

to pay all applicable development fees and comply with applicable requirements related to the provision of police services. As such, the proposed project would not inhibit emergency response time, service ratios, or performance objectives. Impacts would be less than significant. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

c) Schools

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: Schools?

Summary of 2020 General Plan FEIR

The Prior FEIR indicated that future development from the implementation of the 2020 General Plan would increase the need for public facilities, including schools. The Prior FEIR did not directly address impacts that new development associated with the 2020 General Plan may have on existing schools, which could result in the need for new or altered schools. Rather, it directly addressed whether implementation of the 2020 General Plan would construct new or expand existing schools, which could result in a significant impact on the environment. However, the Prior FEIR indicated that the specific sites and construction schedules for any new schools were uncertain and analyzing the potential impacts of new or expanded school facilities would be speculative. Nevertheless, the Prior FEIR stated that Municipal Code Chapter 15.68 would require new developments to pay required fees for public services, and new public facility projects, such as schools, would be subject to CEQA review.¹¹¹ Therefore, the Prior FEIR concluded that impacts would be less than significant.

Proposed Project Analysis and Conclusion

The Napa Valley Unified School District (NVUSD) serves more than 16,500 students in kindergarten through twelfth grade in 27 schools.¹¹² Willow Elementary School is the closest public elementary school to the project site, located approximately 715 feet northeast from the project site. Unidos Middle School is the closest public middle school, located approximately 0.59 mile northwest of the project site, and Vintage High School is the closest public high school, located approximately 0.44 mile southeast of the project site.

The fees set forth in Government Code Section 65996 constitute the exclusive means of both “considering” and “mitigating” school facilities impacts of projects. With payment of impact fees to

¹¹¹ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Page 3.4-17. December 1.

¹¹² Napa Valley Unified School District (NVUSD). About the NVUSD. Website: <https://www.nvUSD.org/about>. Accessed May 7, 2025.

NVUSD, operation of the proposed project would have less than significant impacts. Additionally, the proposed project would result in a nominal increase in the population of the City, and therefore, new students would be able to be accommodated without disrupting the service objectives and student-teacher ratio goals set out by NVUSD. Thus, impacts would be less than significant. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

d, e) Parks and Other Public Services?

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: Parks? Other public services?

Summary of 2020 General Plan FEIR

As previously mentioned, the 2020 General Plan did not directly address impacts that new development implementing the 2020 General Plan could have on existing public facilities, which could result in the need for new or altered facilities. Rather, it addressed impacts that would be generated from the construction of new or altered facilities associated with the implementation of the 2020 General Plan. Since the 2020 General Plan would not directly construct any new facilities, the Prior FEIR concluded that the sites and construction schedules for new facilities anticipated from the 2020 General Plan were uncertain. However, it did mention that new developments would be required to pay fees for public services under Napa Municipal Code Chapter 15.68 and that new public facility projects would undergo individual CEQA review.

Nevertheless, the Prior FEIR indicated that implementation of the 2020 General Plan would increase the need for public facilities and further mentioned that the City's Park and Recreation Element is incorporated into the 2020 General Plan, which calls for the construction of a proposed City trail system. Since the Prior FEIR anticipated that implementation of the 2020 General Plan would generate an increase in demand for public facilities such as parks and includes the City's Park and Recreation Element, which plans for the construction of a new City trail system, the Prior FEIR outlined policies contained within the 2020 General Plan intended to avoid and reduce significant environmental impacts pertaining to the construction of the City trail system, such as Policies NR-1.1 and NR-1.8, which are intended to reduce impacts related to biological resources through the protection of riparian habitats from incompatible uses and activities. Furthermore, the 2020 General Plan contains policies that can be associated with any new recreational facilities, such as Policy PR-3.4, which claims that the City will locate new parks and facilities in areas adjacent to those protected by development. Additionally, new parks and recreational facilities would be required to comply with Policy Resolution No. 27, which requires new facilities to submit a grading and drainage plan to prevent drainage impacts from introduced impervious surfaces and construction activities and to

install and shield low-level lighting in parking areas to avoid glare. Overall, the Prior FEIR did not directly address project impacts on existing facilities, which could result in the need for new or altered facilities. Rather, the Prior FEIR outlined policies from the 2020 General Plan intended to avoid and reduce significant environmental impacts related to the construction of new parks and facilities and concluded that impacts would be less than significant.

Proposed Project Analysis and Conclusion

Parks

The City provides residents with access to approximately 820.5 acres of park land, including opportunities for both active and passive recreation. The City's park system consists of a variety of recreation attractions, such as parks, open space, playgrounds, sport fields, a golf course, the Napa River, and miles of natural and paved trails for walking, biking, and hiking. In addition to parkland resources, the Parks and Recreation staff maintains over 21 acres of landscaped areas throughout the City.¹¹³ According to the General Plan, the Parks and Recreation element contains a target standard for provision of 1.5 acres of parks per 1,000 residents. Based on an estimate of 77,492 residents and a total City inventory of 820.5 acres of parkland, the Parks and Recreation Department provides over 10 acres of parkland per 1,000 residents, which is well in excess of the 1.5 acres/1,000 residents target.¹¹⁴ The closest park to the proposed project is North Jefferson Park, approximately 1,268 feet northeast of the project site.

Although the proposed project does not propose the development of additional parks on-site, similar to all new development projects in the City, the project applicant would be required to dedicate land or pay fees, pursuant to Chapter 15.68 of the Napa Municipal Code, prior to the issuance of building permits. Therefore, the impact would be less than significant.

Other Public Facilities

There are several public facilities within the City, such as library branches, sports facilities, and community centers. As noted above and in Section 2.14, the proposed project would not likely create a substantial increase in demand or require construction of new facilities. The proposed project is consistent with the City's General Plan, and, as such, the estimated 189 residents would be considered planned growth consistent with the Prior FEIR. Therefore, impacts would be less than significant.

Conclusion

Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

¹¹³ City of Napa. 2022. City of Napa 2040 General Plan. October.

¹¹⁴ City of Napa. 2010. Parks and Facilities Master Plan.

Applicable 2020 General Plan FEIR Mitigation Measures

None required.

Conclusion

With regard to Public Services, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. There is no new information of substantial importance, change in the proposed project, or change in the circumstances under which it would be undertaken identifying new significant effects, nor is there a substantial increase in the severity of previously identified impacts. The conclusions from the Prior FEIR remain unchanged when considering the implementation of the proposed project.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.16 Recreation					
Would the project:					
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?	Not Applicable	No	No	No	No
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?	Less than significant impact	No	No	No	No

a) Existing Neighborhood and Regional Parks

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

Summary of 2020 General Plan FEIR

The Prior FEIR analyzed local and regional parks under public facilities and stated that changes brought by a project from overuse and overcrowding to public facilities would not be considered as significant environmental impacts under CEQA at the time the Prior FEIR was established. As such, this checklist question was not included in the Prior FEIR. No conclusion was made in the Prior FEIR regarding the significance level of impacts related to the project's potential to cause substantial or to accelerate deterioration of a facility due to generating an increase in facility usage.

Proposed Project Analysis and Conclusion

The proposed project would result in the addition of 189 new residents to the City, which would increase the demand on existing neighborhood parks. Although the proposed project would not develop additional parks on-site, similar to all new development projects in the City, the project

applicant would be required to dedicate land or pay fees, pursuant to Chapter 15.68 of the Napa Municipal Code, prior to the issuance of building permits. Thus, any resulting increase in the need for additional facilities would be offset by the required payment of these development fees¹¹⁵ and impacts would be less than significant. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

b) Recreational Facilities

Does the project: **b) include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?**

Summary of 2020 General Plan FEIR

The Prior FEIR indicated that the 2020 General Plan incorporates the City's Parks and Recreation Element, which includes the development of a proposed City trail system. As such, the Prior FEIR acknowledged that construction and operation of the proposed City trail system could result in significant environmental impacts pertaining to biological resources, hydrology and water quality, noise, and aesthetics. However, the Prior FEIR highlighted policies intended to avoid and reduce impacts generated from the proposed City trail system which can also be applied to newly developed recreational facilities, such as Policies NR-1.1 and NR-1.8, which emphasize protection of biological resources by restricting public access to riparian habitats along the Napa River and its tributaries. For new recreational facilities associated with the implementation of the 2020 General Plan, Policy PR-3.4 would require the City to locate new parks and trails adjacent to protected areas when appropriate. Additionally, new recreational facilities would be required to abide Policy Resolution No. 27, which contains City standard mitigation measures for new developments, such as submitting a drainage and grading plan to prevent construction materials from entering public waterways and storm drains and requiring the utilization of low-level lighting in parking areas and shielding to avoid glare. The Prior FEIR also stated that the City's Parks and Recreation Element discloses appropriate mitigation measures that remain applicable to future parks and recreational facilities implementing the 2020 General Plan. Therefore, the Prior FEIR concluded that impacts would be less than significant.

Proposed Project Analysis and Conclusion

As discussed above, the proposed project does not include the construction or expansion of public recreational facilities. The proposed project would result in the addition of 189 new residents, which is already anticipated in the City's General Plan because the proposed project would be consistent with existing zoning and the General Plan land use designation. As described above, the proposed project would be required to pay in lieu fees to the City for park dedication. Therefore, the proposed project would not result in adverse physical impacts associated with such facilities and impacts would be less than significant. Therefore, the proposed project does not have any project-specific significant effects

¹¹⁵ City of Napa. 2024. Park Development Fees. Website: <https://www.ecode360.com/43394047#43394047>. Accessed: May 7, 2025.

which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

Applicable 2020 General Plan FEIR Mitigation Measures

None required.

Conclusion

With regard to Recreation, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. There is no new information of substantial importance, change in the proposed project, or change in the circumstances under which it would be undertaken identifying new significant effects, nor is there a substantial increase in the severity of previously identified impacts. The conclusions from the Prior FEIR remain unchanged when considering the implementation of the proposed project.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.17 Transportation <i>Would the project:</i>					
a) Conflict with a program plan, ordinance or policy of the circulation system, including transit, roadway, bicycle and pedestrian facilities?	Significant and unavoidable impact	No	No	No	No
b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	Not Applicable	No	No	No	No
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Not Applicable	No	No	No	No
d) Result in inadequate emergency access?	Not Applicable	No	No	No	No

The analysis in this section is based, in part, on the Traffic Impact Study prepared for the proposed project by W-Trans on August 1, 2019, and the VMT Analysis prepared by W-Trans on August 17, 2020 (Appendix H).^{116, 117}

Setting

Study Area—Operational Analysis

The study area consists of El Centro Avenue fronting the proposed project and the project's access point, as well as the following intersections:

1. SR-29/Wine Country Avenue

¹¹⁶ W-Trans. 2019. Traffic Impact Study for the Zinfandel Estate Subdivision. August 1.

¹¹⁷ W-Trans. 2020. Addendum to the Traffic Impact Study for the Zinfandel Estate Subdivision – VMT Analysis. August 17.

2. Jefferson Street/EI Centro Avenue

SR-29/Wine Country Avenue is a signalized, four-legged intersection with protected left-turn phasing on both SR-29 approaches, while the eastbound and westbound approaches of Wine Country Avenue have permitted left-turn phasing. A crosswalk with pedestrian phasing is provided on the northern leg and signs are present prohibiting pedestrian crossings on all other legs, directing pedestrians to cross at adjacent intersections.

Jefferson Street/EI Centro Avenue is an unsignalized T-intersection stop-controlled on the eastbound EI Centro Avenue approach. An alleyway creates a fourth leg to the intersection on the eastern side of Jefferson Street, though it is offset approximately 50 feet south of EI Centro Avenue, so it is actually outside the area that makes up the intersection. Crosswalks are provided on the north and west legs of the intersection.

EI Centro Avenue is a residential street that runs east–west and is bounded by Byway East on the west and Big Ranch Road on the east, but it is disconnected at Jefferson Street. The segment west of Jefferson Street is approximately 0.5 mile in length and has a posted speed limit of 30 miles per hour (mph) except for the section adjacent to the Willow Elementary School where the standard school speed limit of 25 mph “when children are present” is posted. The roadway varies in width between 28 and 40 feet depending on whether or not frontage improvements have been made to parcels on the southern side of the street. Street parking is permitted in the westbound direction and in select locations in the eastbound direction.

Collision History

Collision rates were calculated based on records available from the California Highway Patrol as published in their Statewide Integrated Traffic Records System (SWITRS) reports from January 1, 2012 through December 31, 2016. The calculated collision rates for the study intersections were compared to the average collision rates for similar facilities Statewide. As shown in Table 13, the study intersection of SR-29/Wine Country Avenue had a calculated collision rate below the Statewide average for similar facilities and there were no reported collisions at Jefferson Street/EI Centro Avenue, indicating that there are no readily apparent safety issues at either intersection.

Table 13: Collision Rates at the Study Intersections

Study Intersection	Number of Collisions (2012–2016)	Calculated Collision Rate (c/mve)	Statewide Average Collision Rate (c/mve)
SR-29/Wine Country Avenue	12	0.22	0.27
Jefferson Street/EI Centro Avenue	0	0.00	0.18
Notes: c/mve = collisions per million vehicles entering Source: W-Trans. 2019.			

Alternative Modes of Transportation

Pedestrian Facilities

Pedestrian facilities include sidewalks, crosswalks, pedestrian signal phases, curb ramps, curb extensions, and various streetscape amenities, such as lighting and benches. In general, a connected sidewalk network is present on the northern side of El Centro Avenue, but it is sporadic on the southern side. Curb ramps and crosswalks at side street approaches are present in the locations that do have sidewalks but not all are equipped with truncated domes and are, therefore, not compliant with current Americans with Disabilities Act (ADA) standards. Lighting is provided by overhead streetlights, and there is a single crosswalk on El Centro Avenue located just east of Verbena Street.

Bicycle Facilities

The Caltrans Highway Design Manual (HDM)¹¹⁸ classifies bikeways into four categories:

- Class I Bikeway (Bike Path)—Provides a completely separate facility for the exclusive use of bicycles and pedestrians with crossflow by vehicles minimized.
- Class II Bikeway (Bike Lane)—Provides a striped lane for one-way bike travel on a street or highway.
- Class III Bikeway (Bike Route)—Provides for shared use with pedestrian or motor vehicle traffic.
- Class IV Bikeway (Separated Bikeway)—Provides for the exclusive use of bicycles and includes a separation (e.g., grade separation, flexible posts, inflexible physical barrier, or on-street parking) required between the separated bikeway and the through vehicular traffic.

Class II bike lanes exist on Jefferson Street between El Centro Avenue and Rubicon Street and between Salvador Avenue and Darling Street, and there are plans to provide a Class III bike route on El Centro Avenue. Additionally, a 12.5-mile segment of the Vine Trail is completed and runs parallel to SR-29 between Trancas Street in the City and Madison Street in Yountville. This trail is located approximately 0.25 mile west of the project site and, when completed, would provide regional bicycle access between Vallejo and Calistoga. A future Class I trail is also planned along Salvador Channel between Jefferson Street and SR-29, which would connect the project site to the Vine Trail. A future Class II bike route is also planned along Jefferson Street between Darling Street and El Centro Avenue. Table 14 summarizes the existing and planned bicycle facilities in the project vicinity.

¹¹⁸ California Department of Transportation (Caltrans). 2020. Highway Design Manual (HDM). Chapter 1000: Bicycle Transportation Design. Website: <https://dot.ca.gov/-/media/dot-media/programs/design/documents/chp1000-a11y.pdf>. Accessed May 7, 2025.

Table 14: Bicycle Facilities in the Project Vicinity

Facility	Class	Length (miles)	Begin Point	End Point
Existing				
Vine Trail	I	12.5	Kennedy Park	Madison Street
Jefferson Street	II	0.9	El Centro Avenue	Rubicon Street
Jefferson Street	II	0.3	Darling Street	Salvador Avenue
Planned				
Vine Trail	I	Regional	Vallejo	Calistoga
Salvador Creek Trail	I	0.7	Jefferson Street	SR-29
El Centro Avenue	III	0.8	SR-29	Heather Lane
Jefferson Street	II	0.3	Darling Street	El Centro Avenue
Source: W-Trans. City of Napa Bicycle Plan. 2012.				

Transit Facilities

Transit services in the City and throughout Napa County are provided by Napa Valley Intercity Neighborhood Express (VINE). VINE Route E provides service between Salvador Avenue and 3rd Street every day of the week except for Sunday and stops on Byway East just north of El Centro Avenue and on Jefferson Street just south of Maximillian Court. Both stops are approximately 0.25 mile from the project site, which is considered an acceptable walking distance.

Dial-a-ride, also known as paratransit or door-to-door service, is available for those who are unable to independently use the transit system due to a physical or mental disability. VINE Go is VINE's paratransit service and is designed to serve the needs of individuals with disabilities in the cities of Calistoga, St. Helena, Napa, American Canyon, the Town of Yountville, and the unincorporated areas of Napa County.

Level of Service

Level of Service (LOS) is used to rank traffic operations on various types of facilities based on traffic volumes and roadway capacity using a series of letter designations from A to F. Generally, LOS A represents free flow conditions and LOS F represents forced flow or breakdown conditions. The ranges of delays associated with the various levels of service are indicated in Table 15.

Table 15: Intersection Level of Service Criteria

LOS	Two-Way Stop-Controlled	Signalized
A	Delay of 0 to 10 seconds. Gaps in traffic are readily available for drivers existing the minor street.	Delay of 0 to 10 seconds. Most vehicles arrive during the green phase, so do not stop at all.
B	Delay of 10 to 15 seconds. Gaps in traffic are somewhat less readily available than with LOS A, but no queueing occurs on the minor street.	Delay of 10 to 20 seconds. More vehicles stop than with LOS A, but many drivers still do not have to stop.
C	Delay of 15 to 25 seconds. Acceptable gaps in traffic are less frequent, and drivers may approach while another vehicle is already waiting to exit the side street.	Delay of 20 to 35 seconds. The number of vehicles stopping is significant, although many still pass through without stopping.
D	Delay of 25 to 35 seconds. There are fewer acceptable gaps in traffic, and drivers may enter a queue of one or two vehicles on the side street.	Delay of 35 to 55 seconds. The influence of congestion is noticeable, and most vehicles have to stop.
E	Delay of 35 to 50 seconds. Few acceptable gaps in traffic are available, and longer queues may form on the side street.	Delay of 55 to 80 seconds. Most, if not all, vehicles must stop and drivers consider the delay excessive.
F	Delay of more than 50 seconds. Drivers may wait for long periods before there is an acceptable gap in traffic for exiting the side streets, creating long queues.	Delay of more than 80 seconds. Vehicles may wait through more than one cycle to clear the intersection.
Source: Highway Capacity Manual. 2000.		

The LOS for Jefferson Street/EI Centro Avenue, which has side street stop-controls, were analyzed using the “Two-Way Stop-Controlled” intersection capacity method from the 2010 Highway Capacity Manual. This methodology determines an LOS for each minor turning movement by estimating the level of average delay in seconds per vehicles. Results are presented for individual movements together with the weighted overall average delay for the intersection.

SR-29/Wine Country Avenue was evaluated using the signalized methodology from the 2000 Highway Capacity Manual. This methodology is based on factors including traffic volumes, green time for each movement, phasing, whether or not the signals are coordinated, truck traffic, and pedestrian activity. Average stopped delay per vehicle in seconds is used as the basis for evaluation in this LOS methodology.

Existing

Under existing conditions, both study intersections are operating acceptably overall and on the EI Centro Avenue approach at LOS C or better during both peak-hours. Table 16 summarizes the existing peak-hour intersection LOS.

Table 16: Existing Peak-hour Intersection Levels of Service

Study Intersection Approach	AM Peak		PM Peak	
	Delay ¹	LOS	Delay ¹	LOS
SR-29/Wine Country Avenue	29.1	C	29.7	C
Jefferson Street/El Centro Avenue	4.9	A	2.8	A
<i>Eastbound (El Centro Avenue) Approach</i>	17.8	C	12.3	B
Notes: LOS = Level of Service ¹ Delay is measured in seconds per vehicle Source: W-Trans. 2019.				

Future

Future volumes for the horizon year 2040 were calculated based on output from the Napa Solano Travel Demand Model, maintained by the Solano Transportation Authority (STA). Base year (2015) and future (2040) segment volumes for the weekday AM and PM peak periods were used to calculate growth factors for the study intersections.

The growth factors projected by the model were adjusted to account for the 2 years of growth that occurred between 2015 and 2017 existing counts. The existing counts were then multiplied by the growth factor to project likely future AM and PM turning movement volumes at the study intersections. Growth factors of 1.24 and 1.10 were calculated for SR-29/Wine Country Avenue and Jefferson Street/El Centro Avenue, respectively, during both peak-hours.

Under the anticipated future volumes, both intersections are expected to continue operating acceptably at the same levels of service as under existing conditions. Future operating conditions are summarized in Table 17.

Table 17: Future Peak-hour Intersection Levels of Service

Study Intersection (Approach)	AM Peak		PM Peak	
	Delay ¹	LOS	Delay ¹	LOS
SR-29/Wine Country Avenue	31.6	C	33.1	C
Jefferson Street/El Centro Avenue	5.7	A	3.0	A
<i>Eastbound (El Centro Avenue) Approach</i>	21.4	C	13.1	B
Notes: LOS = Level of Service ¹ Delay is measured in seconds per vehicle Source: W-Trans. 2019.				

a) Affect to Circulation System

Would the project: Conflict with a program plan, ordinance or policy of the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Summary of 2020 General Plan FEIR

Transit

VINE and Napa Valley Transit (NVT) are the two public transit systems that serve the City. Both transit services carried approximately 700,000 passengers between 1993 and 1994, comprising about 2 percent of all street and highway trips throughout the County. The Prior FEIR did not mention any plan, policy, or program of the circulation system pertaining to public transportation. However, the Prior FEIR highlighted policies and implementation programs within the 2020 General Plan intended to support alternative modes of transportation to reduce automobile congestion, such as Policies LU-5.3 and T-5.12, which require new commercial developments to be designed to support mass transit and encourage developers to include public transit and other alternatives to single occupancy vehicles, and Policies T-5.7, T-5.9, and T-5.10, which encourage the expansion of the existing public transit system. Furthermore, Policy T-5.1 sets the objective of increasing the transit/automobile split from 2 percent between 1993 and 1994 to 5 percent by 2020 through financial support. As such, the Prior FEIR identified policies and implementation programs within the 2020 General Plan that would likely not conflict with any program plan, policy, or ordinance of the circulation system pertaining to public transportation.¹¹⁹

Bicycle Facilities

The Prior FEIR determined that the City contains a Bicycle Plan, which was developed in coordination with members from local cycling clubs, making up the Bicycle Advisory Committee (BAC). The Bicycle Plan looks to provide more direct access to public facilities. As such, the Prior FEIR indicated that the 2020 General Plan contains policies that are consistent with and support the Bicycle Plan, such as Policies LU-5.3 and T-6.9, which require the design and planning of new commercial and residential developments to support bicycle access, and Policies T-6.3 and T-6.12, which recommend establishing new bicycle infrastructure and connecting to existing regional bicycle routes. As such, the Prior FEIR concluded that the policies within the 2020 General Plan would not conflict with a program plan, policy, or ordinance of the circulation system pertaining to bicycle facilities.¹²⁰

Pedestrian Facilities

The Prior FEIR did not directly address impacts pertaining to conflicting with a plan, policy, or program of the circulation system pertaining to pedestrian facilities. However, the Prior FEIR mentioned that retaining an attractive and safe pedestrian environment with storefronts is critical to downtown's long-term commercial success. The Prior FEIR outlined policies and implementation programs within the 2020 General Plan that support City's downtown objective, such as Policies T-9.1 and T-9.5, which recommend new and existing developments provide and maintain pedestrian

¹¹⁹ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Page 3.3-16 – 3.3-17. December 1.

¹²⁰ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Page 3.3-16. December 1.

access, and Policy T-9.4, which encourages linking regional Ridge and Bay trails to downtown through connection of the City's planned trains. Furthermore, Implementation Program T-9.A would promote pedestrian access in development projects through zoning standards and incentives. Therefore, the Prior FEIR highlighted policies and implementation programs contained in the 2020 General Plan that support the City's downtown objective on maintaining a pedestrian environment and, thus, would not conflict with a program plan, policy, or ordinance of the circulation system pertaining to pedestrian facilities.¹²¹

Roadway Facilities

The Prior FEIR determined that the 2020 General Plan would not conflict with the Napa County Congestion Management Agency's Congestion Management Plan, and the majority of traffic associated with development within the City would be adequately mitigated by the policies and programs of the 2020 General Plan. However, some intersections would operate at LOS F, creating potentially significant impacts. Additionally, the Prior FEIR identified potentially significant impacts related to the uncertainty of funding for transportation improvements and City trips that would impact roads and intersections outside city limits. Therefore, the Prior FEIR concluded that impacts would be significant and unavoidable related to roadway facilities.¹²²

Proposed Project Analysis and Conclusion

Pedestrian Facilities

Given the proximity of the project site to the transit stops located on Byway East and Jefferson Street, it is reasonable to assume that some residents of the subdivision would want to be able to walk to the stops and use the transit service. Additionally, some project residents may wish to walk to Willow Elementary School, which is located on the north side of El Centro Avenue and east of the project site. The proposed project would provide improvements along its entire frontage with El Centro Avenue consistent with the improvements that have already been made and the City's future plans for the roadway. Such improvements include widening El Centro Avenue by approximately 12 feet and providing a separated sidewalk, which would improve access for pedestrians and connect the site to the surrounding pedestrian network.

Bicycle Facilities

Existing bicycle facilities, including bike lanes on Jefferson Street between El Centro Avenue and Rubicon Street, together with shared use of minor streets provide access for bicyclists and would be further improved upon completion of the planned improvements outlined in the City of Napa Bicycle Plan, including a Class III bikeway along El Centro Avenue. The proposed project does not include any components that would potentially interfere with carrying out the planned bicycle projects. Additionally, the proposed project would include a Class III bikeway along El Centro Avenue between

¹²¹ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Page 3.3-16. December 1.

¹²² Ibid.

the Byway East and Jefferson Street consistent with the City's conditions of approval. These bicycle facilities would comply with all applicable policies and requirements.

Public Transit Facilities

Existing transit routes are adequate to accommodate project-generated transit trips, and the stops are within acceptable walking distance of the project site.

Level of Service

Short-Term

Upon the addition of project-related traffic to existing volumes, the study intersections are expected to continue operating acceptably at the same levels of service as under existing conditions. These results are summarized in Table 18.

Table 18: Existing and Existing Plus Project Peak-hour Intersection LOS

Study Intersection (Approach)	Existing Conditions				Existing Plus Project			
	AM Peak		PM Peak		AM Peak		PM Peak	
	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
SR-29/Wine Country Avenue	29.1	C	29.7	C	30.4	C	30.2	C
Jefferson Street/EI Centro Avenue	4.9	A	2.8	A	5.2	A	3.1	A
<i>Eastbound (EI Centro Avenue) Approach</i>	17.8	C	12.3	B	18.4	C	12.7	B
Notes: LOS = Level of Service ¹ Delay is measured in seconds per vehicle Source: W-Trans. 2019.								

As shown in Table 19, above, the study intersections are expected to continue operating acceptably at the same LOS upon the addition of project-generated traffic to existing volumes, and the proposed project would be consistent with the General Plan's requirements related to LOS. Therefore, short-term impacts related to consistency with the General Plan would be less than significant.

Upon the addition of project-related traffic to the anticipated future volumes, the study intersections are expected to continue operating acceptably at the same levels of service as under existing conditions. The Future Plus Project operating conditions are summarized in Table 19.

Table 19: Future and Future Plus Project Peak-hour Intersection LOS

Study Intersection/Approach	Future Conditions				Future Plus Project			
	AM Peak		PM Peak		AM Peak		PM Peak	
	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
• SR-29/Wine Country Avenue	31.6	C	33.1	C	33.8	C	32.8	C
• Jefferson Street/EI Centro Avenue	5.7	A	3.0	A	6.2	A	3.2	A
• <i>Eastbound (EI Centro Avenue) Approach</i>	21.4	C	13.1	B	22.6	C	13.5	B
Notes: LOS = Level of Service ¹ Delay is measured in seconds per vehicle Source: W-Trans. 2019.								

As shown in Table 20, above, with the addition of project-related traffic volumes, average delay at SR-29/Wine Country Avenue is projected to decrease slightly during the PM peak-hour. The proposed project would add trips predominantly to the northbound right-turn movement at this intersection during the evening peak-hours, which has a lower average delay than the intersection as a whole, resulting in a slight reduction in the overall average delay. Furthermore, the study intersections are expected to continue operating acceptably at the same LOS upon the addition of project-generated traffic to anticipated future volumes, and the proposed project would be consistent with the General Plan's requirements related to LOS. Therefore, long-term impacts related to consistency with the General Plan would be less than significant.

Conclusion

In summary, the proposed project would not conflict with any plans or policies for transportation facilities and would provide adequate pedestrian, bicycle, and transit facilities. Impacts would be less than significant. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

b) Inconsistent with CEQA Guidelines Section 15064.3

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

Summary of 2020 General Plan FEIR

This checklist question was not included in the Prior FEIR. No conclusion was made in the Prior FEIR regarding the significance level of impacts related to the proposed project's potential to conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).

Proposed Project Analysis and Conclusion

CEQA Guidelines Section 15064.3 subdivision (b) discusses the potential impacts of projects for which land uses may increase VMT as a direct result of the implementation of the proposed project. VMT refers to the amount and distance of automobile travel attributed to a project. Other relevant considerations may include the effects of the proposed project on transit and non-motorized travel. Section 15065.3(b) of the CEQA Guidelines assesses criteria for analyzing transportation impacts, such as land use projects, transportation projects, qualitative analysis, and methodology. Section 15064.3(b)(1) states that projects within 0.5 mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact.

The City adopted significance thresholds for VMT on May 4, 2021. These thresholds are consistent with OPR's recommendations in the Technical Advisory on Evaluating Transportation Impacts in CEQA. For VMT screening requirements, the City follows the criteria set by the OPR in the Technical Advisory on Evaluating Transportation Impacts in CEQA.¹²³ To analyze the potential impact of the proposed project, a Countywide home-based VMT per capita estimate was calculated from the output of the California Statewide Travel Demand Model, using figures for population and VMT for each traffic analysis zone (TAZ) in the County. Based on this methodology, it was estimated that Napa County has a Countywide per capita home-based VMT of 11.05 miles per day. Applying OPR's guidance, a residential project generating a VMT that is 15 percent or more below this value, or 9.38 miles per capita per day or less, would have a less than significant VMT impact.

The proposed project is located in TAZ 808, which has a per capita home-based VMT of 7.85 miles per day, which is 29 percent below the Countywide average. Since this is more than 15 percent below the Countywide average value, the proposed project would have a less than significant transportation impact on OPR's guidance. This information is summarized in Table 20.

Table 20: Vehicle Miles Traveled Analysis Summary

VMT Metric	Baseline VMT Rate	Significance Threshold	Project VMT Rate	Resulting Significance
Residential VMT per Capita (Countywide Baseline)	11.04	9.38	7.85	Less than significant impact
Notes: VMT = Vehicle Miles Traveled VMT Rate is measured in VMT per capita, or the number of daily miles driven per resident. Source: W-Trans. 2019.				

¹²³ California Governor's Office of Planning and Research (OPR). 2018. Technical Advisory on Evaluating Transportation Impacts in CEQA. December.

As shown in Table 21, above, the proposed project would be expected to have a less than significant transportation impact related to VMT. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

c) Roadway Safety Hazards

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)?

Summary of 2020 General Plan FEIR

The Prior FEIR did not directly address whether future development associated with the implementation of the 2020 General Plan would increase hazards due to geometric design features or incompatible uses. However, the Prior FEIR identified goals and policies that the 2020 General Plan contained to reduce impacts related to roadway safety hazards or incompatible uses, such as Goal LU-4, which requires new development be consistent with the City's already existing character and urban form, including policies mandating the compatibility of residential, commercial, and industrial land uses.¹²⁴

Proposed Project Analysis and Conclusion

The proposed project would include a new residential street, Clementina Circle, which would form a loop on the southern side of El Centro Avenue and provide access to the majority of the lots in the proposed project. The two lots on the southern parcel would be accessed via a private drive extending east from Lassen Street. Clementina Circle would intersect El Centro Avenue in two places. The western intersection would be opposite Via La Paz, and the eastern intersection would be located just east of the existing residential driveway that would be demolished as part of the proposed project.

The Traffic Impact Study for the proposed project indicates that on-site circulation would be expected to operate acceptably. Furthermore, the Clementina Circle approaches to El Centro Avenue would be stop-controlled, and crosswalks would be provided on the southern legs of both intersections. The proposed project would also be required to comply with City of Napa Standard Drawing S-25, which specifies vegetation height requirements within sight vision triangles. Thus, impacts would be less than significant. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

¹²⁴ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Page 3.2-4. December 1.

d) Emergency Access

Would the project: Result in inadequate emergency access?

Summary of 2020 General Plan FEIR

The Prior FEIR did not directly address whether future development associated with the implementation of the 2020 General Plan would result in inadequate emergency access. However, the Prior FEIR identified policies within the 2020 General Plan related to reducing impacts on emergency access within Chapter 8, Health and Safety, on emergency preparedness and response, including enhancing emergency response plans and identifying feasible evacuation routes.

Proposed Project Analysis and Conclusion

Emergency vehicles would continue to have access to roadways in the area during construction and after completion of the proposed project. The proposed project would not impede emergency access or response. The NFD and NPD have reviewed and conditionally approved the project site plans to ensure that adequate emergency vehicle access is provided. For example, the proposed project would be required to pay the Fire Impact Fees in accordance with the standard mitigation measures and conditions of approval set forth by the City. Compliance with NFD and NPD requirements would ensure impacts remain less than significant. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

Applicable 2020 General Plan FEIR Mitigation Measures

None required.

Conclusion

With regard to Transportation, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. There is no new information of substantial importance, change in the proposed project, or change in the circumstances under which it would be undertaken identifying new significant effects, nor is there a substantial increase in the severity of previously identified impacts. The conclusions from the Prior FEIR remain unchanged when considering the implementation of the proposed project.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.18 Utilities and Service Systems					
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?	Less than significant impact	No	No	No	No
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	Significant and unavoidable impact	No	No	No	No
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?	Less than significant impact	No	No	No	No
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?	Less than significant impact	No	No	No	No

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	Not Applicable	No	No	No	No

a) Water, Wastewater, and Stormwater Facilities

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?**

Summary of 2020 General Plan FEIR

The Prior FEIR acknowledged that future development implementing the 2020 General Plan could increase the demand for services, resulting in the relocation or construction of new or expanded facilities. A summary of the potential impacts pertaining to the relocation or construction of new or expanded water, wastewater treatment, electric power, and natural gas facilities is summarized below. The 2020 General Plan EIR did not provide information on the potential for relocation or construction of new or expanded telecommunications facilities.

Water

The City provides potable water services through active connections within and outside the city limits. The Prior FEIR determined that although the City has enough potable water supply to support development associated with the implementation of the 2020 General Plan during normal conditions, future development could result in excess demand for potable water during drought years. However, this would not result in the relocation or construction of new or expanded water facilities because the Prior FEIR identified policies and implementation measures in the 2020 General Plan related to water supply and conservation, such as Policy CS-9.1 and Policy CS-9.3, which request water conservation programs and the use of reclaimed wastewater for irrigation purposes, and Policy CS-9.8, which looks to control urban development in the City's Water Service Area beyond the RUL. Furthermore, the Prior FEIR identified that the City's SWP entitlements would increase to 18,000 acre-feet per year (AFY) from the existing SWP entitlement of 6,600 AFY. Additionally, other municipalities have already reached, or will reach, their full entitlement before the City. As such, the reduction in deliveries to other municipalities would result in the City receiving more water in dry years. Therefore, the Prior

FEIR concluded that implementation of the 2020 General Plan would not require the relocation or expansion of the City's and the SWP's facilities.¹²⁵

Wastewater

The Napa Sanitation District (NapaSan) provides wastewater services to the City of Napa and surrounding areas and consists of the Imola and Soscol Water Recycling Facility (SWRF) treatment plants. The Imola facility and SWRF were deemed to have inadequate treatment capacity, with temporary river disposal and pond storage systems utilized for the maximum allowable capacity. The Prior FEIR determined that, although phases from the Wastewater Master Plan developed by NapaSan in 1990 were implemented to address capacity issues and meet current and increasing demands through expanding and upgrading existing facilities, along with 2020 General Plan policies reducing demand through conservation efforts, the Prior FEIR concluded that implementation of the 2020 General Plan would further exacerbate existing demands and would result in NapaSan needing to expand its wastewater treatment facilities to provide adequate services. However, 2020 General Plan Policy CS-10.3 requires new developments to obtain a "will-serve" letter from NapaSan prior to project approval when the NapaSan wastewater treatment facilities are deemed to have inadequate capacity. Therefore, the Prior FEIR concluded that implementation of the 2020 General Plan would have a less than significant impact related to the relocation or construction of new or expanded wastewater treatment facilities.¹²⁶

Electric Power and Natural Gas

As of the time that the Prior FEIR was prepared, PG&E provided electric and natural gas services to the City, consisting of four electric substations and two major gas systems. Although the Prior FEIR did not directly address whether future development associated with the implementation of the 2020 General Plan would result in the relocation or construction of new or expanded facilities, the Prior FEIR indicated that future development would result in an increased demand for natural gas and electrical services. However, the increase in services would be minimal as policies and implementation measures in the 2020 General Plan, such as Policy NR-5.3, which promotes energy conservation improvement programs to reduce the demand from power-generating facilities, and Policy Resolution No. 27, which requires the construction and design of future projects to incorporate energy conservation measures, would reduce potential impacts. Furthermore, the Prior FEIR stated that no new major electrical infrastructure would be constructed as most of the future development under the 2020 General Plan would be within the RUL, which is already highly urbanized and is in PG&E's service area. Minor distribution lines would be constructed to serve those new areas intended to be encompassed within the RUL with the implementation of the 2020 General Plan. However, the Prior FEIR concluded that these would be ministerial and future development from the

¹²⁵ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Page 3.4-7 – 3.4-12. December 1.

¹²⁶ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Page 3.4-13 – 3.4-15. December 1.

2020 General Plan would not result in the relocation or construction of new or expanded major electrical facilities.¹²⁷

Proposed Project Analysis and Conclusion

Water

The proposed project's water needs would be met by the City. The proposed project would connect to the existing distribution main on El Centro Avenue and Lassen Street and would include a new distribution pipeline within the project site. The proposed project would not require additional water infrastructure to be built or expanded. As described in Impact 4.14(a), the proposed project is estimated to result in approximately 189 new residents. Using UWMP methodology, the proposed project is expected to generate a water demand of 24,948 gallons per day (GPD), or approximately 27.95 AFY.¹²⁸ According to the UWMP, the total water supply for the City is 14,092 AFY.¹²⁹ The proposed project's additional demand constitutes approximately 0.2 percent of the total water demand, and as the proposed project would be consistent with existing General Plan land use designation, its water demand was already accounted for in the UWMP. Therefore, the proposed project does not require and would not result in the construction of new water facilities or expansion of existing facilities. Impacts would be less than significant.

Wastewater

NapaSan is responsible for wastewater collection, treatment, and disposal in the City. The proposed project would connect to an existing 18-inch sanitary sewer line in El Centro Avenue for the northern portion of the project site and a 10-inch sanitary sewer line in Lassen Street for the southern portion of the project site. The proposed project would not require additional wastewater infrastructure to be built or expanded. Wastewater from the proposed project would flow to the SWRF. The SWRF has a treatment capacity of 15.4 million GPD and currently treats an average of 12 million GPD. Thus, the SWRF has the capacity to treat the additional wastewater generated by the proposed project.¹³⁰ The proposed project is in accordance with the land use and zoning in the General Plan and would thus constitute planned growth for the City. Therefore, the proposed project would not require the construction or relocation of new or expanded wastewater facilities. Impacts would be less than significant.

Stormwater

The proposed project would include the installation of stormwater management systems on-site. Additionally, the proposed project would connect to existing 36-inch storm drain lines on El Centro Avenue and Lassen Street. As discussed in Section 2.7, Geology and Soils, and Section 2.10, Hydrology and Water Quality, the proposed project would also prepare and implement a SWPPP and BMPs, which would ensure that impacts related to stormwater would be less than significant.

¹²⁷ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Page 3.4-16 – 3.4-17. December 1.

¹²⁸ 189 residents * 132 gal/pp/day = 24,948 gallons per day

¹²⁹ City of Napa. 2022. 2020 Urban Water Management Plan. January.

¹³⁰ Napa Sanitation District (NapaSan). Socol Water Recycling Facility (SWRF). Website: <https://napasan.com/178/Socol-Water-Recycling-Facility>. Accessed May 7, 2025.

Therefore, the proposed project would not substantially increase stormwater drainage such that new or expanded facilities or relocation would be required. Impacts would be less than significant.

Electric Power and Telecommunication Facilities

There are telecommunications companies who operate and maintain transmission and distribution infrastructure in the project vicinity and currently serve the existing uses on the project site. Impacts associated with the proposed project's electricity demand are discussed in Section 2.6, Energy.

The site is currently served by telecommunications infrastructure and the proposed project would connect to existing infrastructure. Therefore, the proposed project would not require the installation or development of new or improved telecommunication facilities such that environmental impacts would occur. Impacts would be less than significant.

Conclusion

As noted above, impacts would be less than significant. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

b) Water Supply

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

Summary of 2020 General Plan FEIR

As previously mentioned, the Prior FEIR determined that future development implementing the 2020 General Plan would exceed the demand for potable water during drought years with a current deficit of 4,200 AFY. The Prior FEIR outlined a variety of options to meet potable water service demands during drought years from the City's Draft Water System Optimization and Master Plan. One option included increasing the City's full SWP entitlement from 6,600 AFY to 18,000 AFY in the year 2021, which would further exceed the requested SWP entitlement as other municipalities' full SWP entitlement would be reached before the City's. Hence, the City would obtain excess amounts of water during dry years due to the SWP's reduction in deliveries. Other options included obtaining potable water from the SWP Drought Water Bank Program, the proposed American Basin Conjunctive Use Project, the State Water Project Supplemental Water Purchase Program, and Interruptible Entitlements within the Delta, which is available for extraction during most years. Furthermore, the Prior FEIR highlighted policies within the 2020 General Plan that emphasize water conservation efforts, including the use of reclaimed water for irrigation purposes. Despite these available options and policies, the Prior FEIR identified that the City requested the State modify its entitlements for the North Bay Aqueduct, which would enable the City to meet drought water demands. However, at the time the Prior FEIR was prepared, the revision of the North Bay Aqueduct entitlements had not yet been approved and the City had not pursued the other options previously

mentioned. As such, the Prior FEIR concluded that implementation of the 2020 General Plan would have a significant impact pertaining to sufficient water supplies. Therefore, the 2020 General Plan includes Policy CS-9.3, which limits ministerial and discretionary project approval until an applicant obtains approval from the Public Works Department stating that the City would be able to provide potable water to the City during drought years with the implementation of the project. The Prior FEIR determined that while this policy would reduce potential impacts related to potable water supply, the 2020 General Plan would result in a significant and unavoidable impact because several factors outside of the City's control impact drought-year water supply.¹³¹

Proposed Project Analysis and Conclusion

The City relies on a combination of imported water, local surface water, and a small amount of recycled water to meet its water needs. The City works together with the SWP to ensure a safe and reliable water supply that would continue to serve the community in periods of drought and shortage. The City's receives 35 percent of its annual supply (5,170 AFY) from its rights to Lake Hennessey, 61 percent (8,922 AFY) from the SWP, and 4 percent (568 AFY) of recycled water from NapaSan.¹³² The comparison between the supply and demand for projected years between 2025 and 2045 is shown in Table 21.

Table 21: City of Napa Water Supply and Demand Assessment

Supply and Demand Assessment		2025	2030	2035	2040	2045
Normal Year Supply and Demand Comparison						
Supply totals		31,737		31,997	28,907	28,907
Demand totals		15,065		15,750	16,100	16,650
Difference		16,672		16,247	12,807	12,257
Single Dry Year Supply and Demand Comparison						
Supply totals		17,702	17,962	16,275	16,275	16,275
Demand totals		15,065	15,750	16,100	16,425	16,650
Difference		2,637	2,212	175	-150	-375
Multiple Dry Year Supply and Demand Comparison						
First Year	Supply totals	20,941	21,201	19,191	19,191	19,191
	Demand totals	15,065	15,750	16,100	16,425	16,650
	Difference	5,876	5,451	3,091	2,766	2,541
Second Year	Supply totals	15,065	16,326	14,803	14,803	14,803
	Demand totals	15,065	15,750	16,100	16,425	16,650

¹³¹ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Page 3.4-7 – 3.4-12. December 1.

¹³² City of Napa. 2022. 2020 Urban Water Management Plan. January.

Supply and Demand Assessment		2025	2030	2035	2040	2045
	Difference	1,001	576	-1,297	-1,622	-1,847
Third Year	Supply totals	16,066	16,326	14,803	14,803	14,803
	Demand totals	15,065	15,70,	16,100	16,425	16,650
	Difference	1,001	576	-1,297	-1,622	-1,847
Fourth Year	Supply totals	16,066	16,326	14,803	14,803	14,803
	Demand totals	15,065	15,70,	16,100	16,425	16,650
	Difference	1,001	576	-1,297	-1,622	-1,847
Fifth Year	Supply totals	16,066	16,326	14,803	14,803	14,803
	Demand totals	15,065	15,750	16,100	16,425	16,650
	Difference	1,001	576	-1,297	-1,622	-1,847
Notes: Volumes are in acre-feet. Bold text indicates water demand exceeding available water supply. Source: City of Napa. 2020 UWMP. 2022.						

Based on a conservative estimate that does not account for the current water demand of the project site, the proposed project would generate a water demand of 24,948 GPD, or approximately 27.95 AFY, which is approximately 0.2 percent of the total demand. In order to ensure the City would have sufficient water supplies available, the Prior FEIR states that the 2020 General Plan seeks to control urban development in the City's Water Service Area beyond the RUL. As such infill development consistent with the uses planned for in the 2020 General Plan would ensure the City meets this goal. Development of uses consistent with those anticipated by the 2020 General Plan ensures that water supply projections detailed in the 2020 UWMP remain accurate. The proposed project is consistent with the project site's existing zoning and General land use designation; therefore, the demand was already evaluated in the 2020 General Plan Final EIR and is accounted for in the current UWMP. Thus, there is water supply available for the City, and the water supply demanded by the proposed project can be accommodated by the existing supply.

The UWMP describes the City's plans to meet full service demands under all foreseeable hydrologic conditions, meeting a single dry year and multiple dry year eligibility. Table 22 shows the comparison between the supply and demand for projected years between 2025 and 2045 for different hydrologic scenarios. City demands are projected to be met with imported water and recycled water supplies with available SWP surplus supplies. As described above, development consistent with the uses anticipated by the Prior FEIR ensures that the demand projections contained in the 2020 UWMP remain accurate. As the proposed project is consistent with the site's existing zoning and land use designation, and as such consistent with the uses contemplated in the Prior FEIR, the proposed project's water demand would be accommodated in multiple dry year scenarios. Therefore, the

proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

c) Wastewater Treatment Capacity

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?

Summary of 2020 General Plan FEIR

As previously mentioned, the Prior FEIR determined that the Imola wastewater treatment plant and SWRF had inadequate wastewater treatment capacity, and future development implementing the 2020 General Plan would further strain existing wastewater treatment services. The Prior FEIR identified that the NapaSan Wastewater Treatment Plan had begun to implement strategies to expand and improve wastewater treatment, such as constructing and upgrading existing facilities. The Prior FEIR determined that although these upgrades would be able to serve a population of 82,000 individuals, which is above the 2020 General Plan's projected population of 81,140, anticipating full development within the RUL, both the Imola facility and SWRF under existing conditions would be unable to adequately provide services to new developments associated with the implementation of the 2020 General Plan. However, 2020 General Plan Policy CS-10.3 requires new developments to obtain a "will-serve" letter from NapaSan prior to project approval when the NapaSan wastewater treatment facilities are deemed to have inadequate capacity. Therefore, the Prior FEIR concluded that new developments from the implementation of the 2020 General Plan would result in a less than significant impact on the wastewater treatment provider with mitigation.¹³³

Proposed Project Analysis and Conclusion

NapaSan maintains and operates the wastewater collection and treatment system of the City, including the project site. The proposed project would connect to the existing 18-inch sanitary sewer line in El Centro Avenue and an existing 10-inch sanitary sewer line in Lassen Street. The SWRF has a permitted dry weather treatment capacity of 15.4 million GPD and treats approximately 12 million gallons of wastewater per day.¹³⁴ According to the Prior FEIR, improvements to the NapaSan wastewater treatment infrastructure would allow NapaSan to serve a population of approximately 82,000 persons. As discussed in Section 4.14, Population and Housing, the current population of the City is approximately 77,492, while the proposed project includes the development of 51 single-family homes and would contribute approximately 189 new residents. As such, the growth induced by the proposed project would be within the serviceable population projected by the Prior FEIR for NapaSan's wastewater treatment capacity and would contribute an incremental increase in wastewater generation as compared to current conditions. However, the development of the

¹³³ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Page 3.4-13. December 1.

¹³⁴ Napa Sanitation District (NapaSan). Socol Water Recycling Facility (SWRF). Website: <https://napasan.com/178/Socol-Water-Recycling-Facility>. Accessed May 7, 2025.

proposed project is consistent with the land use anticipated in the General Plan, and wastewater generated by the proposed project is consistent with the service needs anticipated by the General Plan and would not require the expansion of treatment facilities or the construction of new facilities. Therefore, the proposed project would not exceed wastewater treatment requirements. Impacts would be less than significant. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

d) Solid Waste Reduction Goals Consistency

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?

Summary of 2020 General Plan FEIR

The Prior FEIR identified that solid waste within the City is processed at the Napa County Solid Waste Transfer Station consisting of a capacity of 520 tons per day, before being shipped to Washington State to be deposited at the Roosevelt Regional Landfill. The Prior FEIR acknowledged that development implementing the 2020 General Plan would increase existing solid waste disposal requirements. However, the Roosevelt Regional Landfill had adequate capacity to serve any anticipated future development associated with the 2020 General Plan. Furthermore, the Prior FEIR determined that the 2020 General Plan contains policies and implementation programs which would reduce potential impacts, such as Policies CS-12.1 and CS-12.2, which call for waste reduction and recycling public awareness programs and continued monitoring of the City's SRRE. The Prior FEIR further identified that meeting standards within Policy Resolution No. 27, which requires new projects to submit a source reduction plan, would reduce potential impacts. As such, the Prior FEIR concluded that future development associated with the 2020 General Plan would not generate solid waste in excess of existing standards or local infrastructure.¹³⁵

Proposed Project Analysis and Conclusion

Solid waste collection and recycling services for the City are provided by NRWS. NRWS collects solid waste for the City of Napa and southern unincorporated Napa County. Solid waste is taken to the Delvin Road Recycling and Transfer Facility, where it is loaded into trucks and sent to the Potrero Hill Landfill.

The California Department of Resources Recycling and Recovery (CalRecycle) provides a solid waste generation factor by residential projects. Using the generation rate of approximately 12.23 pounds (lbs) per household per day for residential development, the proposed project would generate approximately 893 lbs per day of solid waste, or approximately 0.45 tons, representing a nominal

¹³⁵ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Page 3.4-16. December 1.

amount of the Potrero Landfill's daily capacity of 4,330 tons, shown in Table 22.¹³⁶ Therefore, the existing landfills have sufficient capacity to serve the proposed project and solid waste generated during construction and operation would represent a negligible increase compared to the daily permitted tonnage at landfills. Additionally, the proposed project would also include recycling programs to reduce solid waste and comply with all applicable regulations for solid waste. Thus, impacts would be less than significant, and no mitigation is required. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

Table 22: Napa County Landfill Availability

Landfill	Landfill Address	Closure Date	Maximum Daily Permitted Throughput (tons per day)	Maximum Permitted Capacity (cubic yards)	Remaining Capacity (cubic yards)
Potrero Hills Landfill	3675 Potrero Hills Lane, Suisun City, CA 94585	2/14/2048	4,330	83,100,000	13,872,000

Source: California Department of Resources Recycling and Recovery (CalRecycle). 2025.

e) Solid Waste Regulations Consistency

Would the project: Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?

Summary of 2020 General Plan FEIR

The Prior FEIR did not directly address impacts related to compliance with federal, State, or local solid waste management and reduction statutes. However, as previously mentioned, the Prior FEIR identified policies and implementation measures within the 2020 General Plan, such as Policy CS-12.1, calling for provisions in waste reduction and recycling public awareness programs, and Policy CS-12.2, indicating the City will continue to monitor its SRRE. Additionally, new developments would be required to abide by Policy Resolution No. 27, which requires the submittal of a source reduction plan consistent with the City's SRRE. Although not directly stated, the Prior FEIR outlined policies and implementation measures from the 2020 General Plan that would be consistent with federal, State, and local solid waste management and reduction statutes.¹³⁷

¹³⁶ California Department of Resources Recycling and Recovery (CalRecycle). 2025. SWIS Facility/Site Activity Details. Website: <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1194?siteID=3591>. Accessed May 7, 2025.

¹³⁷ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Page 3.4-16. December 1.

Proposed Project Analysis and Conclusion

The proposed development would be required to comply with applicable federal, State, and local regulations related to solid waste, such as Napa Municipal Code Chapters 5.60 (Municipal Solid Waste, Recyclable Materials and Compost Collection and Disposal) and 5.61 (Mandatory Municipal Solid Waste, Recyclable Material and Compostables Disposal Reduction); Resolution R2012 100, the City's disposal reduction policy; and Policy Resolution No. 27, which require submittal of a source reduction plan consistent with the SRRE of the City's General Plan. Therefore, a portion of solid waste would be diverted from landfill through recycling, composting, and other methods in compliance with federal, State, and local management and reduction statutes. Therefore, the proposed project would not violate applicable federal, State, and local statutes and regulations related to solid waste and impacts would be less than significant. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

Applicable 2020 General Plan FEIR Mitigation Measures

None required.

Conclusion

With regard to Utilities and Service Systems, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. There is no new information of substantial importance, change in the proposed project, or change in the circumstances under which it would be undertaken identifying new significant effects, nor is there a substantial increase in the severity of previously identified impacts. The conclusions from the Prior FEIR remain unchanged when considering the implementation of the proposed project.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.19 Wildfire <i>If located in or near State Responsibility Areas or lands classified as Very High Fire Hazard Severity Zones, would the project:</i>					
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	Less than significant impact	No	No	No	No
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?	Not Applicable	No	No	No	No
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?	Not Applicable	No	No	No	No
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?	Not Applicable	No	No	No	No

Setting

The California Department of Forestry and Fire Protection (CAL FIRE) prepares maps of Fire Hazard Severity Zones (FHSZ) that are used to develop recommendations planning. State Responsibility Areas (SRAs) are areas of the State where the financial responsibility of preventing and suppressing fires has been determined by the board, pursuant to Section 4125, to be primarily the responsibility of the State. The project site is not located in a designated FHSZ in an SRA. The project site is not located in a designated Very High FHSZ (VHFHSZ) in a Local Responsibility Area (LRA).¹³⁸ The closest FHSZ to the project site is a Moderate FHSZ located in an LRA approximately 1.04 miles west of the project site. The closest VHFHSZ to the project is located in an LRA approximately 2.5 miles east of the project site.

a) Emergency Response/Evacuation Plan Consistency

Would the project: If located in or near State Responsibility Areas or lands classified as Very High Fire Hazard Severity Zones, substantially impair an adopted emergency response plan or emergency evacuation plan?

Summary of 2020 General Plan FEIR

The Prior FEIR identified policies within the 2020 General Plan that would reduce impacts pertaining to impairing emergency response or evacuation plans within Chapter 8, Health and Safety, which include maintaining and enhancing emergency response plans, identifying suitable evacuation routes, and conducting citywide rehearsals of procedures established within the Disaster Management Plan. Furthermore, Policy HS-8 of the 2020 General Plan aims for the City to be a community informed and educated about hazards and safety procedures that participates in County emergency response efforts.

Proposed Project Analysis and Conclusion

The proposed project is not located within an area designated as an FHSZ in an LRA or SRA, nor is it near one, as the closest FHSZ is approximately 1.04 miles to the west. The City does not currently have designated evacuation routes, but the proposed project is approximately 0.22 mile east of SR-29, which is one of the City's crucial corridors for circulation in the event of an emergency, according to the City's General Plan.¹³⁹ As discussed under Impact 4.9(f), the proposed project would not require modification of existing roadways in a way that would hinder emergency access or evacuation during and after construction, such as permanent road closures or lane narrowing. Project site access and internal roadways would be required to meet the width for emergency vehicles requirements of

¹³⁸ California Department of Forestry and Fire Protection (CAL FIRE). Napa County FHSZ Maps. Website: <https://experience.arcgis.com/experience/03beab8511814e79a0e4eabf0d3e7247/>. Accessed May 7, 2025.

¹³⁹ City of Napa. 1998. Envision Napa 2020 General Plan. December 1.

Napa Municipal Code Section 16.36.030.¹⁴⁰ Furthermore, the project site is flat and is not considered a high severity zone for wildfire.

The proposed project would not impair the implementation of, or physically interfere with, adopted emergency response plan or emergency evacuation plan and would therefore have a less than significant impact. Therefore, impacts would be less than significant. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

b) Expose Project Occupants to Pollutant Concentrations from Wildfire

Would the project: If located in or near State Responsibility Areas or lands classified as Very High Fire Hazard Severity Zones, 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?

Summary of 2020 General Plan FEIR

The Prior FEIR did not directly address impacts related to exposing project occupants to primary wildland fire hazards or uncontrolled wildfires, as wildfire impacts were not adopted in the CEQA Guidelines Appendix G until December 2018. However, the Prior FEIR acknowledged that implementation of the 2020 General Plan could result in development within the wildland urban interface, consisting of wildfire hazards, including complex topography and dense natural vegetation. The Prior FEIR outlined Policy Resolution No. 27, which contains measures to reduce and avoid impacts in areas that are highly susceptible to wildland fires, such as establishing fuel breaks, implementing defensible space standards, and ensuring that projects have sufficient on-site water supply. In addition, Policy HS-5 calls to reduce the risk of life and property from wildland fires.¹⁴¹ As such, the Prior FEIR contained measures and policies that address impacts related to exposing project occupants to wildfire-susceptible areas with hazards that exacerbate wildfire risk.

Proposed Project Analysis and Conclusion

The proposed project is not located within an area designated as an FHSZ in an LRA or SRA, nor is it near one, as the closest FHSZ is approximately 1.04 miles to the west. The project site is relatively flat and would not, therefore, exacerbate wildfire risks due to the development on a steep slope.

The Bay Area Air District monitors air quality data, including wind speeds, and publishes data on its website, which includes the City. In 2022, the City recorded an average wind speed of 4 to 9 mph with

¹⁴⁰ City of Napa. 2024. Napa Municipal Code. June. Website: <https://ecode360.com/43395884#43395884>. Accessed May 7, 2025.

¹⁴¹ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Page 2-11. December 1.

gusts ranging from 24 to 31 mph.¹⁴² Therefore the project site would be expected to experience similar wind speed conditions and would not be susceptible to significantly high wind speeds that could exacerbate risk of spreading wildfires. Furthermore, the project site has not previously experienced a wildfire. Because the project site is not located in or near an area of steep terrain, is not located in or near a historical wildfire burn, and does not experience frequent high winds, the project site would not be likely to exacerbate wildfire risk. Thus, impacts would be less than significant. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

c) Infrastructure that Exacerbates Fire Risk

Would the project: If located in or near State Responsibility Areas or lands classified as Very High Fire Hazard Severity Zones, 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?

Summary of 2020 General Plan FEIR

The Prior FEIR recognized that expansion into the wildland urban interface due to the implementation of the 2020 General Plan could build in areas susceptible to wildland fires. As previously mentioned, the Prior FEIR indicated that future development from the implementation of the 2020 General Plan would be required to abide by Policy Resolution No. 27, which requires the installation of fuel breaks and on-site water supply, along with establishing defensible space around newly developed structures within the wildland urban interface. However, the 2020 General Plan did not address whether the installation of the associated infrastructure would exacerbate fire risk or impacts to the environment, as this environmental analysis question was not adopted into CEQA Guidelines until December 2018. Nevertheless, the Prior FEIR mentioned Policy HS-5 from the 2020 General Plan, which aims to reduce the risk of life and property from wildland fires.¹⁴³

Proposed Project Analysis and Conclusion

The proposed project is not located within an area designated as an FHSZ in an LRA or SRA, nor is it near one, as the closest FHSZ is approximately 1.04 miles to the west. Furthermore, the proposed project is in an urbanized area and is surrounded by urban development that does not contain dense, unmanaged open space or vegetation that would represent a fire hazard that would require fuel breaks. Therefore, the proposed project would not require the installation or maintenance of associated infrastructure. No impact would occur. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project

¹⁴² Bay Area Air Quality Management District (Bay Area Air District). 2022. Meteorology. Website: <https://www.baaqmd.gov/about-air-quality/current-air-quality/air-monitoring-data/#/met?date=2022-01-01&id=203&view=monthly&style=table>. Accessed May 7, 2025.

¹⁴³ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Page 4-8. December 1.

would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

d) Flooding and Landslide Hazards Due To Post-fire Slope Instability/Drainage Changes

Would the project: **If located in or near State Responsibility Areas or lands classified as Very High Fire Hazard Severity Zones ,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?**

Summary of 2020 General Plan FEIR

The Prior FEIR identified that development with the implementation of the 2020 General Plan could encroach into areas containing wildfire hazards, such as those having complex topography and dense natural vegetation. The Prior FEIR indicated that future developments would be required to abide by Policy Resolution No. 27. However, this measure only provides mitigation to reduce or avoid primary wildland fires, such as establishing fuel breaks and on-site water supply features, and does not address secondary wildland fire hazards. Although the Prior FEIR identified areas susceptible to landslides and acknowledged that landslide hazards could be exacerbated from the removal of vegetation, the Prior FEIR identified policies and implementation programs to minimize the risk of landslides and drainage changes, which address primary landslide hazards and project-induced drainage changes. However, the Prior FEIR did not discuss wildfire-induced landslides.¹⁴⁴

Proposed Project Analysis and Conclusion

The project site is flat. Additionally, the proposed project is not located within an area designated as an FHSZ in an LRA or SRA, nor is it near one, as the closest FHSZ is approximately 1.04 miles to the west. Impacts related to landslides and flooding were discussed in Section 2.7, Geology and Soils, and Section 2.10, Hydrology and Water Quality. The proposed project would be required to implement the suggested recommendations from the project-specific Geotechnical Report to address the site-specific conditions and would also be required to implement the BMPs from the SWPPP, as well as a bioretention system to address impacts related to flooding during construction and operation, respectively. Therefore, the proposed project would not expose people or structures to post-fire slope instability or drainage and runoff change. The impact would be less than significant. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

Applicable 2020 General Plan FEIR Mitigation Measures

None required.

¹⁴⁴ City of Napa. 1998. City of Napa General Plan Final Environmental Impact Report. Page 4-8. December 1.

Conclusion

With regard to Wildfire, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. There is no new information of substantial importance, change in the proposed project, or change in the circumstances under which it would be undertaken identifying new significant effects, nor is there a substantial increase in the severity of previously identified impacts. The conclusions from the Prior FEIR remain unchanged when considering the implementation of the proposed project.

Environmental Issues	Prior FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
4.20 Mandatory Findings of Significance					
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?	Less than significant impact	Yes	No	No	No
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)?	Significant and unavoidable impact	No	No	No	No
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	Less than significant impact	No	No	No	No

a) Potential Degradation to Environment and Examples of California History or Prehistory

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?

Summary of 2020 General Plan FEIR

Section 3.5, Cultural Resources, in the Prior FEIR highlighted policies and implementation programs to prevent the elimination of important examples of the State's prehistory in Policies HR-6.1 and HR-6.2; historical structures in Policies HR-1.2, HR-1.3, HR-1.6, and HR-1.10; and historical property districts in Policies LU-1.1, LU-1.4, and LU-4.1. Implementation Programs HR-1.G and HR-1.M guide future development to prevent the alteration of historical structures and areas, and Implementation Program HR-1.N calls for programs to encourage preservation. In addition, the City calls for the identification of significant cultural and historical resources to ensure preservation at the local level in Policy HR-1.1 and Policies HR 2.1 through HR-2.6. Furthermore, the City would require new developments to enhance historic areas under Policy HR-1.20. Although the Prior FEIR determined that the policies and implementation measures would reduce impacts to historical structures and resources, the Prior FEIR indicated that the disturbance to prehistoric and archaeological sites could still occur from the results of ground-disturbing activities. However, future development would be required to comply with standard mitigation requirements detailed in Napa Policy Resolution No. 27. Therefore, the Prior FEIR concluded that impacts related to potential impacts to important examples of the major periods of California history or prehistory would be less than significant.

Proposed Project Analysis and Conclusion

As noted in Section 2.4, Biological Resources, and consistent with Section 15183's mandate to limit environmental review to those issues peculiar to the project or parcel, potential impacts to biological resources, including mandatory findings of significance identified above, will be evaluated in a project-specific analysis to identify any potential impacts along with any available mitigation.

Subsurface construction activities have the potential to destroy or damage previously undiscovered historical or archaeological resources, as well as human remains. Historic resources can include wood, stone, foundations, and other structural remains; debris-filled wells or privies; and deposits of wood, glass, ceramics, and other refuse. Archaeological resources can include but are not limited to stone, bone, wood, or shell artifacts or features, including hearths and structural elements. Damage or destruction of these resources would be a potentially significant impact. Implementation of IM CUL-1 through IM CUL-3, pursuant to 2020 General Plan Policies HR-6.1, HR-6.2, and HR-6.3, would ensure that this potential impact is reduced to a less than significant level.

In the event of the accidental discovery or recognition of any human remains, CEQA Guidelines Section 15064.5, Health and Safety Code Section 7050.5, and Public Resources Code Sections 5097.94 and 5097.98 must be followed. IM CUL-4 further specifies the procedures to follow in the event human remains are uncovered. Along with compliance with required guidelines and statutes, implementation of IM CUL-3, pursuant to 2020 General Plan Policies HR-6.1, HR-6.2, and HR-6.3, would reduce potential impacts on human remains to a less than significant level. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

b) Cumulatively Considerable Impacts

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)?

Summary of 2020 General Plan FEIR

The Prior FEIR analyzed cumulatively considerable impacts with implementation of the 2020 General Plan for each environmental topic. The geographic scope for the cumulative analysis generally encompassed Napa County, but it depended on the environmental topic being analyzed. The Prior FEIR determined that implementation of the 2020 General Plan would result in a significant and unavoidable cumulative impact related to wastewater treatment capacity and water supply during drought years. The Prior FEIR determined that potential cumulative impacts related to land use, transportation, cultural resources, visual quality, biological resources, geology, soils, and seismicity, hydrology and water quality, air quality, noise, and public health would be less than significant.

Proposed Project Analysis and Conclusion

The proposed project is entirely surrounded by existing development. There are no proposed cumulative developments adjacent to or in the immediate vicinity of the proposed project. Furthermore, all cumulative projects would be designed and built in accordance with City of Napa standard conditions of approval and regulations as well as complying with State and federal regulations.

As noted in Section 2.4, Biological Resources, and consistent with Section 15183’s mandate to limit environmental review to those issues peculiar to the project or parcel, potential impacts to biological resources, including mandatory findings of significance identified above, will be evaluated in a project-specific analysis to identify any potential impacts along with any available mitigation.

The proposed project would not result in any potentially significant project-level impacts with the implementation of all applicable policies, regulations, conditions of approval, and implementation measures, including IM CUL-1 through IM CUL-4 and IM GEO-1. Cumulatively, the proposed project would not result in any significant impacts that would substantially combine with impacts of other

current or probably future impacts. Thus, the proposed project, in conjunction with other future development projects, would not result in any cumulatively considerable impacts. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

c) Adverse Effects on Human Beings?

Does the project: Have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

Summary of 2020 General Plan FEIR

The Prior FEIR did not directly address impacts pertaining to direct or indirect effects on human beings. However, significant environmental impacts on human beings can be associated with the environmental topics of air quality, geology and soils, hazards and hazardous materials, hydrology and water quality, noise, and transportation. The Prior FEIR concluded that the goals, policies, and implementation programs in the 2020 General Plan would reduce these significant environmental impacts to less than significant levels. Therefore, the Prior FEIR indicated that implementation of the 2020 General Plan would not result in direct or indirect substantial adverse effects on human beings, and impacts would be less than significant.

Proposed Project Analysis and Conclusion

The above sections of this Consistency Checklist reviewed the proposed project's potential impacts related to air quality, cultural resources, and geology, among other environmental issue areas. As concluded in these previous discussions, the proposed project would result in less than significant impacts with implementation of IM CUL-1 through IM CUL-4 and IM GEO-1. Therefore, with implementation of the specified implementation measures pursuant to General Plan policies and Policy Resolution No. 27, standard BMPs, and conditions of approval, the proposed project would cause less than significant adverse effects on human beings. Therefore, the proposed project does not have any project-specific significant effects which are peculiar to the project or its site. The proposed project would not result in a new or more severe adverse impact that was not previously identified in the Prior FEIR.

Applicable 2020 General Plan FEIR Mitigation Measures

None required.

Project-specific Implementation Measures

Implement IM CUL-1 through IM CUL-4 and IM GEO-1.

Conclusion

With regard to Mandatory Findings of Significance, potential impacts related to biological resources will be evaluated in a project-specific analysis. Except with respect to biological resources, the

proposed project does not have any project-specific significant effects which are peculiar to the project or its site. There is no new information of substantial importance, change in the proposed project, or change in the circumstances under which it would be undertaken identifying new significant effects, nor is there a substantial increase in the severity of previously identified impacts. The conclusions from the Prior FEIR remain unchanged when considering the implementation of the proposed project.

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