

**COUNTY OF NAPA**  
**PLANNING, BUILDING AND ENVIRONMENTAL SERVICES DEPARTMENT**  
**1195 THIRD STEET SUITE 210**  
**NAPA, CA 94559**  
**(707) 253-4417**

**Initial Study Checklist**  
**(form updated January 2019)**

1. **Project Title:** Napa County Monopole Project, RDS 21-22
2. **Property Owner:** Table 1 provides Site specific property ownership in Section 9, Project Description, below.
3. **County Contact Person, Phone Number and email:** John McDowell, (707) 299-1354, [John.McDowell@countyofnapa.org](mailto:John.McDowell@countyofnapa.org)
4. **Project Location and Assessor's Parcel Number (APN):** Table 1 below provides Site specific project locations and the nearest APNs. Figures 1 and 2 provide the Project location and the Project vicinity respectively.
5. **Project sponsor's name and address:** County of Napa and Illumination Technologies Corporation (ITC)
6. **General Plan description:** This information is provided in Table 1 below.
7. **Zoning:** This information is provided in Table 1 below.
8. **Background/Project History:**

Napa county is located directly on major faults including Northern San Andreas, Rodgers Creek, Northern Hayward, the Concord Green Valley and West Napa Fault. The 2014 South Napa earthquake was a magnitude 6.0 earthquake and occurred along the West Napa Fault causing significant damage through both ground shaking and surface rutures throughout the county. Moderate to severe seismic incidences on any of the fault zones is expected to result in significant property damage, potentially deaths and injuries, damage to water, sewer, gas line facilities and communications systems. The County is also substantially vulnerable to wildland/urban interface fires as demonstrated by the significant devastation caused by the 2017 Atlas Fire, and the 2020 Glass and Lake Hennessey Fires. Occasional flooding along the Napa River impacts the City of Napa. One of the goals for reducing risks from hazards set forth in the Napa County Operational Area Hazard Mitigation Plan<sup>1</sup> in regards to disaster emergency response is to continue to strengthen communication systems. The installation of telecommunications infrastructure to currently underserved areas is intended to alieviate gaps in current telecommunication service so that the entire County has immediate access to emergency alerts and notification. The addition of IQ FireWatch poles will enhance early detection of wildlifes for disaster response and sustained communication for vital emergency fire related information.

In February 2021, the Napa County Board of Supervisors entered into contract negotiations with ITC to accomplish the following:

  - Install about 30 monopoles, each approximately 50 to 60 feet tall, at various locations on the County's right-of-way (ROW) for telecom providers to improve cellular telephone coverage in and around the valley floor, and;
  - Install about 8 IQ FireWatch poles (some in the County ROW and some on private property) to house fire sensing technology and telecommunication equipment to improve early detection of wildfires in Napa County.

This CEQA document evaluates the potential environmental impacts that may result from entering into the contract, and authorizing ITC to construct the project.
9. **Description of Project:**

Request for Illumination Technologies Corp (ITC) to enter into a contract with County of Napa, Department of Public Works, to install 23 monopoles and 11 IQ FireWatch poles in select locations within County Public Rights of Way, and on private property with property

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<sup>1</sup> County of Napa. 2020. County Executive Office, Emergency Services Division. Napa County Operational Area Hazard Mitigation Plan. 2020 Update.

owner permission to provide: 1) Early warning fire sensing network cover 90% of the County; and 2) increase cellular communication and broadband wireless connectivity in some locations throughout the County that are currently underserved.

The majority of the monopoles would be installed in public right of way. Some IQ FireWatch poles would be placed on private property with permission from the landowners.

Elements of the monopoles and IQ FireWatch installations are as follows:

#### BROADBAND AND/OR TELECOM SITES (Including co-located with IQ)

Exact site details will be based on the determined specific carrier(s), signal coverage needs, and ground-based equipment requirements. This description consists of maximum (not to exceed) values for tower height, ground equipment footprint or enclosed compound, carrier(s) antennas and ground-based equipment enclosures/cabinet.

The communication site will consist of single “stealth” faux evergreen or cedar monopole (non-guyed) tower, maximum height of 80 feet above ground level. The pole will be set in either an in-ground foundation or an on-grade pad/block foundation.

Up to 15 panel antennas, a maximum of 72 inches tall by 36 inches wide by 24 inches deep will be located at the top of the tower, among faux branches. Another similar set of antennas may be located within 10 feet below the top set, also among faux branches. All cabling will run inside the pole before connecting with specific antenna(s).

Adjacent to the monopole tower will be a maximum 20-foot by 20-foot (400 square feet) equipment area. The area will be either a cement slab, not more than 4-inches tall, or a steel platform(s), not more than 18-inches above ground. Carrier equipment will be housed within weather-proof cabinets or enclosures that are a maximum of 80-inches tall by 72-inches wide by 72-inches deep. There will be a maximum of six enclosures within the total area. There will also be appropriate electrical and fiber optic connection panels as prescribed by the local utilities. The area can be enclosed by a secured fence and gate of appropriate materials. Protective bollards can be installed to protect the facility from minor damages.

All equipment is weatherproof and/or sealed and has containment devices included, in the event of a natural disaster. Equipment will have back-up battery capacity and, depending on location logistics, low-noise, high efficiency generator(s) may be proposed and deployed.

All telecommunications and/or broadband equipment will be subject to any specific encroachment and building permitting requirements, and will be fully compliant with all federal, state, and local regulations and requirements.

#### IQ-ONLY SITES

There are three possible types of towers to deploy and support the fire detection equipment. Information regarding the type of structures for each IQ site is included for each detailed Site description below. The general description for these sites is as follows:

1. Preferred – Trailer mounted tower with solar panels and backup battery.  
Towers between 55-feet and 75-feet above ground level (ABL) will be guyed, secured by appropriate soil screws into the ground and/or trailer outriggers and self-contained with solar and battery backup possible outriggers. The IQ camera is mounted at the top of the tower with a microwave dish (a maximum of 36-inches diameter) located on the tower for data connectivity. All communications and power equipment, along with solar panels are located with weatherproof cabinet(s) on the trailer. The trailer dimensions are 10-feet by 25 feet wide.
2. Optional – Telescoping lattice tower.  
The telescoping lattice tower requires the solar battery backup be in weatherproof cabinets placed on the on-steel grid platforms. The foundation can be either a small diameter pole inserted into the ground or a small foundational pad approximately 5-feet by 10-feet to 10-feet by 10-feet, that will also accommodate the ground equipment cabinet(s).
3. Collocated on an existing tower.

**Table 1. Site Specific Property Information**

Site #	Site Name	Lat./Long.	Property Owner	APN (Nearest)	General Plan Description	Zoning
1	Oakville Crossroad	38.441317/ -122.393956	County Right of Way (ROW)	31080008000	Agricultural Resource	AP
2	Silverado Trail Corp. Yard	38.437003/ -122.349386	County ROW	31110016000	Agriculture, Watershed, & Open Space	AW
3	American Canyon	38.163875/ -122.229336	County ROW	59060025000	Agriculture, Watershed, & Open Space	AW
4	Spanish Flat	38.532536/ -122.226802	County ROW	19262001000	Agriculture, Watershed, & Open Space	CL
5	Imola-Skyline/Fourth Ave.	38.286884/ -122.247059	County ROW	46351016000	Agriculture, Watershed, & Open Space	AW
6/IQ 1	Berryessa Estates	38.691072/ -122.373688	Lake Berryessa Resort Improvement District	1508008000	Agriculture, Watershed, & Open Space	AW
7	Berryessa Pines	38.607933/ -122.282128	County ROW	19280008000	Agriculture, Watershed, & Open Space	AW
8	Circle Oaks	38.407847/ -122.216456	Circle Oaks Water District	32160050000	Agriculture, Watershed, & Open Space	AW
9/ IQ 18	Berryessa Highlands Water Tank	38.508767/ -122.186729	Napa Berryessa Improvement District	19590018000	Agriculture, Watershed, & Open Space	AW
10	Pope Valley Corners	38.615556/ -122.431389	County ROW	018310022000	Agricultural Resource	AW
11	Moskowite Corners/ Steele Canyon	38.446609/ -122.196676	County ROW	32140047000	Rural Residential	CL
12	Dry Creek Fire Station	38.408344/ -122.428883	County ROW	27340075000	Agriculture, Watershed, & Open Space	AW
13	Oakville Grade	38.422111/ -122.417017	County ROW	27280060000	Agriculture, Watershed, & Open Space	AW
14	Skellenger Lane	38.458361/ -122.389864	County ROW	30200019000	Agricultural Resource	AP
15	Deer Park Road	38.558175/ -122.472242	County ROW	21420037000	Agriculture, Watershed, & Open Space	AW
16	Coombsville	38.294039/ -122.254558	County ROW	45240023000	Rural Residential/ Agriculture, Watershed, & Open Space	AW
18	Silverado Pratt	38.519722/ -122.470497	County ROW	25100003000	Agriculture, Watershed, & Open Space	AW
19	Silverado Conn Creek	38.487507/ -122.40689	County ROW	30120015000	Agriculture, Watershed, & Open Space	AP
20	Zinfandel Lane	38.496758/ -122.424828	County ROW	25160006000	Agriculture, Watershed, & Open Space	AP
21	Big Tree Road	38.547297/ -122.510043	County ROW	22034005000	Agriculture, Watershed, & Open Space/Agricultural Preserve	AP
22	Silverado Deer Park	38.524442/ -122.481475	County ROW	21355001000	Agriculture, Watershed, & Open Space/Agricultural Preserve	AP
23	Silverado Hardman	38.341178/ -122.282097	County ROW	391003000	Agricultural Preserve	AP
24	Airport Boulevard	38.220092/ -122.267113	County ROW	5721006000	Industrial	IP:AC

IQ 2	Three Peaks	38.613676/ -122.493652	Private Property	18040039000	Agriculture, Watershed, & Open Space	AW
IQ 7	Mt. George	38.338603/ -122.228011	Private Property	33110050000	Agriculture, Watershed, & Open Space	AW
IQ 8	Long Ranch Road	38.469305/ -122.351266	Private Property	32560023000	Agriculture, Watershed, & Open Space	AW
IQ 15	Foss Valley	38.413345/ -122.254685	Private Property	32550022000	Agricultural Preserve	AW
IQ 19	Spring Mountain	38.506620/ -122.51360	Private Property	58380006000	Agriculture, Watershed, & Open Space	AW

AP- agricultural preserve

AW- agricultural watershed

CL- commercial limited

IP:AC- Industrial Park: Airport Compatibility

### CONSTRUCTION METHODOLOGY

At most of the monopole locations, a concrete pad, typically 20 feet by 20 feet would be excavated, formed and poured. In some, as determined by the results of the geotechnical report, a 5-foot wide by approximately 17-foot wide hole would be drilled to insert the pole. At the IQ FireWatch locations with a lattice tower, concrete pad, typically 10 feet by 10 feet would be excavated, formed and poured.

The crew size involved in the pole installations will range from 6 to 15 people. Equipment that would be used includes a backhoe, excavator, crane, and no more than two haul trucks and concrete trucks.

If groundwater is encountered during the drilling process, the hole would be dewatered by pumping the groundwater into an upland field.

Excess spoils generated from the drill operation would be transported to a landfill.

### Construction Schedule

For IQ FireWatch poles scheduled to be installed in 2021, construction would occur between August and December. Installations average one to three weeks of work depending on installation method and other difficulties that may be encountered. The monopoles would be installed between June and December 2021. However, some monopoles may not be installed for several years depending on telecommunication company leases with ITC.

The pole locations were scattered throughout Napa County therefore the environmental setting for each pole is included below with descriptions of biological resources found, or with potential to occur, at each Site. Soils and hydrology are also included in the environmental setting description for each pole. Images of the proposed structures are included in Figure 3, aerial maps of each location are included in Figure 4 and representative photos of each site are included in Figure 5.

### Oakville Crossroad (Site 1)

This monopole site is located on the south side of Oakville Cross Road in a rural, agricultural area. Site 1 is 0.57 miles east of the unincorporated community of Oakville in the central western portion of Napa County. The latitude of the pole location is 38.441317, and the longitude is -122.393956. The site topography consists of level terrain found in the floor of the Napa Valley. According to the U.S. Department of Agriculture (USDA) Soil Survey, soils at the pole site consist of Yolo loam (181) and yolo loam (182). The geologic setting of the vicinity is Qhay – younger alluvium (late Holocene). The pole would be installed in a disturbed graveled area adjacent to the roadway and approximately 242 feet northeast from the Napa River. The habitat in the vicinity of the pole site is primarily agricultural, consisting of an irrigated hay field to the south and a vineyard to the north. The Biological Study Area (BSA) (defined as a 300 foot radius around the site to evaluate potential direct and indirect impacts to biological resources such as plants, wildlife and aquatic features) also has a narrow strip of riparian corridor along the banks of the Napa River located to the west of the Site. Numerous coast live oaks (*Quercus agrifolia*) line the roadway in this area, however, the pole would be located in a ruderal, highly disturbed roadside where there is a gap in the trees. Possible tree trimming may be need overhead of the pole site. Given the disturbed nature of the site from past fill activity, there is no potential for special-status plant species, and none were observed during the March 2, 2021 biological resources survey. The location does not provide suitable habitat for special-status wildlife species. However, in consultation with Native American tribes, and as identified in the cultural resources report prepared for this project, the site and general vicinity are sensitive for cultural resources and thus mitigation to relocate the monopole further east away from the Napa River is warranted to avoid potential impacts to cultural resources.

#### Silverado Trail Corporation Yard (Site 2)

This monopole site is located on the east side of Silverado Trail on the border of Yountville and Oakville. The latitude is 38.437003, and the longitude is -122.349386. The topography of the area transitions from the level valley floor to foothills of the Vaca Mountain Range. According to the USDA Soil Survey, soils at the pole site consist of Boomer-Forward-Felta-Complex (110). The geologic setting is Qhf – Alluvial fan deposits (Holocene). The habitat within the vicinity of the pole site consists of vineyards to the west and open annual grassland to the east and south. A Napa County corporate yard is situated to the north in a paved and ruderal area. The pole would be located on a barren road shoulder and approximately 571 feet southeast from Rector Creek. Given the disturbed nature of the site from past fill activity, there is no potential for special-status plant species and none were observed during the March 25, 2021 biological resources survey. The location does not provide suitable habitat for special-status wildlife species. There is a roadside drainage ditch between the road and the pole location that would need protection. Also, there is a row of trees along the east side of the road within close proximity to the pole location site, and while no tree removal is anticipated, minor tree trimming may be necessary.

#### American Canyon (Site 3)

This monopole site is located on the north side of American Canyon Road approximately 1.3 miles east of the SR 29/American Canyon Road intersection in American Canyon. The latitude is 38.163875 and the longitude is -122.229336. This pole is approximately 300 feet north of American Canyon Creek, a tributary of the Napa River. The hilly terrain within the vicinity is dominated by annual grasslands. Across the road from the Site, American Canyon Creek flows east to west and supports a sparse mix of riparian vegetation and fresh emergent wetland. This area would be avoided by the Project. The pole would be installed in a disturbed fill slope that may have originated from nearby earthwork done in the past. According to the USDA soil survey, soils at the site consist of Clear Lake Clay (116) and Montara Clay Loam (167), which is described as having serpentine qualities and serpentinite fragments were observed during the March 3, 2021 biological resources survey. The geologic setting is Qpf – Aluvial fan deposits (late Pleistocene). The pole site might be on fill material from nearby earthwork. Given the disturbed nature of the site from past fill activity, there is no potential for special-status plant species and none were observed during the biological resources survey. The location does not provide suitable habitat for special-status wildlife species. There is a detention basin with drainage swale along the roadway just below the location where the pole would be installed. The swale drains into American Canyon Creek and would need to be protected during construction activities.

#### Spanish Flat (Site 4)

This monopole site is located on the west side of Berryessa Knoxville Road in an area known as Spanish Flat. Spanish Flat is located in unincorporated eastern Napa County on the southwestern side of Lake Berryessa. The latitude is 38.532536, and the longitude is -122.226802. This area is situated at 550 feet above sea level and the topography of the site consists of hilly terrain. The pole would be installed in a disturbed roadside shoulder with gravel and compact soil approximately 0.64 miles southwest of Lake Berryessa. According to the USDA Soil Survey, soils at the pole site consist of Bressa-Dibble complex (114) and Millsholm loam (164). The geologic setting is KJgv – sandstone, shale, and conglomerate (late Cretaceous to late Jurassic). The habitat in the vicinity of the pole site consists of ruderal areas and blue oak woodland/annual grassland mosaic however the region burned during the 2020 Hennessey Fire and vegetation is surrounding the area is still recovering. The pole would be located in a ruderal, highly disturbed area, therefore is no potential for special-status plant species, and none were observed during the March 2, 2021 biological resources survey. The location itself does not provide suitable habitat for special-status wildlife species. There are unnamed drainages to the north and south of the pole that must be protected during construction. Potential tree trimming may be required.

#### Imola-Skyline-Fourth Avenue (Site 5)

This monopole site is located at a curve on 4th Avenue approximately 0.6 mile north of Imola Avenue in the outskirts of southeast Napa. The latitude is 38.286884, and the longitude is -122.247059. The pole would be installed in a disturbed roadside. This pole is approximately 0.27 miles south of Tulucay Creek and approximately 0.32 miles north of Kreuse Creek. According to the USDA Soil Survey, soils at the pole site consist of Sobrante loam (178). The geologic setting is Tsvd – diatomite. The surrounding habitat is annual grassland, vineyard, and irrigated hayfield. There are no aquatic features associated with this site.

#### Berryessa Estates (Site 6/IQ1)

The pole would be placed on an existing leveled pad surrounding a water tank on a ridgetop above the Berryessa Estates Development, which is located several miles northwest of Lake Berryessa. The latitude is 38.691072, and the longitude is -122.373688. The hilly topography in the site vicinity consists of mixed chaparral and a blue oak/foothill pine woodland mosaic. A vast expanse of this region was burned during the 2020 Hennessey fire and vegetation is just beginning to recover. According to the USDA Soil Survey, soils at the pole sites consist of Maymen-Millsholm-Lodo association (163). The geologic setting is Kfm – Metagraywacke (Late and Early Cretaceous). There are no aquatic features in the vicinity; the nearest aquatic features are Putah Creek, located 0.45 miles northeast of the site, and Stone Corral Creek, located 0.48 miles southeast of the site.

The water tank pad was bladed, but there is no gravel layer present, therefore a mix of native and non-native herbaceous plants were present. The potential of special-status herbaceous plants to occur on the pad is high and the western side of the water tank pad should be flagged for avoidance. While no special-status plant were identified during 2021 botanical surveys once the area recovers from drought and fires, special-status plants cover occur in subsequent years therefore pre-construction botanical surveys should be conducted if construction is pushed beyond 2021. There is no suitable habitat for special-status wildlife species.

A free-standing 50' lattice tower, where the tower base and stabilization can be either (1) a small diameter pole inserted up to six (6) feet into the ground and set inside the lattice tower or (2) a small cement foundation pad approximately to 10' (wide) by 10' (long), at appropriate depth, that will also accommodate the ground equipment cabinet and solar panel arrays (s). An alternative to the cement equipment pad can be a max. 10' (wide) by 10' (long) by 4" (thick) fabricated non-slip steel platform, set on four (4) to six (6) max. 20" diameter by 8" tall cement footings.

The ground equipment will include one (1) max. 24" (wide) by 48" (tall) by 36" (deep) weatherproof equipment cabinet, containing IQ hardware/computer and solar battery monitoring equipment. A solar panel array made up of max. four 4-panel sections, with each (of the four) sections is 48" by 48", and affixed to the cement pad or equipment cabinet and oriented for max. solar collection. The IQ camera will be mounted at the top of the 50' pole with a microwave dish (max 36" diameter), mounted below the camera on the pole for data connectivity.

#### Berryessa Pines (Site 7)

This monopole site is located on the east side of Berryessa Knoxville Road between Spanish Flat and Walter Springs along the northwestern edge of Lake Berryessa. The latitude is 38.607933, the longitude is -122.282128, and the elevation is 635 feet Above Mean Sea Level (AMSL). The surrounding hilly terrain consists of a mosaic of blue oak-foothill pine. The area was burned in the 2020 Hennessey Fire, and vegetation is just beginning to re-emerge. According to the USDA Soil Survey, soils at the pole site consist of Henneke gravelly loam (154). The geologic setting is spm – Serpentinite matrix mélange. The pole would be installed in a highly disturbed, graveled pullout situated on the east side of the road. This pole is approximately 0.51 miles west of Lake Berryessa. While the habitat surrounding the Site is sensitive, given the disturbed nature of the pullout, there is no potential for special-status plant species and none were observed during the March 2, 2021 biological resources survey. The location does not provide suitable habitat for special-status wildlife species. There are no aquatic resources in the vicinity of the BSA.

#### Circle Oaks (Site 8)

This monopole site is located next to a water tank in a leveled, graveled pad near a hilltop above Circle Oaks, a rural, residential subdivision located 0.5 miles west of State Route 121 and several miles south of Lake Berryessa. The latitude is 38.407847, and the longitude is -122.216456. The elevation of the site is 1,635 AMSL and within hilly terrain in montane hardwood conifer dominated by madrone. This pole is approximately 0.39 acres southeast of Capell Creek. According to the USDA Soil Survey, soils at the pole site consist of Forward silt loam (140). The geologic setting is Tsva – Andesite to basalt flows. The pad is mostly devoid of vegetation with the exception of some emerging non-native grasses. Given the disturbed nature of the site from past activity associated with levelling and gravelling of the pad, there is no potential for special-status plant species, and none were observed during the March 19, 2021 biological resources survey. While the habitat surrounding the water tank pad is sensitive, the pole location does not provide suitable habitat for special-status wildlife species. No aquatic resources occur within the BSA or vicinity.

#### Berryessa Highlands Water Tank (Site 9/IQ 18)

These monopole sites are located next to a water tank situated on a leveled pad near a hilltop above a rural, housing development known as Berryessa Highlands in the vicinity of Spanish Flat near the southeast end of Lake Berryessa. This pole is approximately 0.18 miles west of an unknown tributary to Lake Berryessa and approximately 0.74 miles southeast of Lake Berryessa. More specifically the site is on a hilltop east of Rimrock Drive. The latitude is 38.508767, and the longitude is -122.186729. The habitat surrounding the pad consists of blue oak-foothill pine woodland that was recently burned in the Hennessey Fire. The elevation is 1,030 AMSL, and the topography of the area is hilly. According to the USDA Soil Survey, soils at the pole sites consist of Bressa-Dibble complex (115). The geologic setting is KJgv – sandstone, shale and conglomerate (late Cretaceous to late Jurassic). The poles would be installed within the leveled footprint around the water tower. Given the disturbed nature of the site from past grading activity, there is no potential for special-status plant species, and none were observed during the March 19, 2021 biological resources survey. The location does not provide suitable habitat for special-status wildlife species. There are no aquatic resources within the BSA or vicinity.

A guyed 75' lattice tower, where the tower base and stabilization can be either (1) a small diameter pole inserted up to six (6) feet into the ground and set inside the lattice tower or (2) a small cement foundation pad approximately to 10' (wide) by 10' (long), at appropriate depth, that will also accommodate the ground equipment cabinet and solar panel arrays (s). An alternative to the cement equipment pad can be a max. 10' (wide) by 10' (long) by 4" (thick) fabricated non-slip steel platform, set on four (4) to six (6) max. 20" diameter by 8" tall cement footings.

The ground equipment will include one (1) max. 24" (wide) by 48" (tall) by 36" (deep) weatherproof equipment cabinet, containing IQ hardware/computer and solar battery monitoring equipment. A solar panel array made up of max. four 4-panel sections, with each (of the four) sections is 48" by 48", and affixed to the cement pad or equipment cabinet and oriented for max. solar collection. The IQ camera will be mounted at the top of the 75' pole with a microwave dish (max 36" diameter), mounted below the camera on the pole for data connectivity.

#### Pope Valley Corners (Site 10)

This monopole site is located on the northeast side of Pope Valley Road approximately 0.2 miles northwest of Pope Valley Road and the intersection of Howell Mountain Road in Pope Valley, a rural, unincorporated community in northern Napa County. The latitude is 38.615556, and the longitude is -122.431389. This pole is located 0.44 miles west of an unnamed tributary to Burton Creek. The elevation is 710 feet AMSL and the terrain in the immediate vicinity transitions of the relatively level valley floor of Pope Valley to the hilly terrain west of the valley. The surrounding habitat is vineyard, remnant oak woodland, and a grassland/oak woodland mosaic; however, the pole site habitat is ruderal. According to the USDA Soil Survey, soils at the pole site consist of Bressa-Dibble complex (114) and Pleasanton loam (171). The geologic setting is KJgv – sandstone, shale and conglomerate (late Cretaceous to late Jurassic). There is no suitable habitat for special-status plant or wildlife species in the immediate vicinity of the BSA. There are no aquatic features located within or near the BSA.

#### Moskowite Corners/Steele Canyon (Site 11)

This monopole site is located on the south side of Steele Canyon Road in the Capell Valley region of central eastern Napa County. The latitude is 38.446609, and the longitude is -122.196676. This pole is approximately 0.13 miles southwest of Oak Moss Creek. The elevation is 855 AMSL, and the specific pole location is in an area that transitions from flat valley floor to foothills of Wragg Ridge to the east. The surrounding habitat is annual grassland, vineyard, and blue oak/foothill pine woodland, and the pole would be installed in a paved parking lot. According to the USDA Soil Survey, soils at the pole site consist of Pleasanton loam (170). The geologic setting is Qa – alluvium (Holocene and late Pleistocene). There is no suitable habitat for special-status plants and wildlife, and there are no aquatic features in the BSA or vicinity.

#### Dry Creek Fire Station (Site 12)

This monopole site is located on the south side of Oakville Grade in the Mayacamas Mountain foothills. Site 12 is west of the unincorporated community of Oakville in central western Napa County. The latitude is 38.408344, and the longitude is -122.428883. This pole is approximately 0.14 miles northeast of Dry Creek. The topography of the site is hilly, and the elevation is 655 feet AMSL. According to the USDA Soil Survey, soils at the pole site consist of Lodo-Maymen-Felton association (157). The geologic setting is KJgv – sandstone, shale and conglomerate (late Cretaceous to late Jurassic). The surrounding habitat is annual grassland chaparral on the slopes north of the roadway and annual grassland with oak riparian woodland to the south along the banks of Dry Creek. The pole would be installed on an existing ruderal, graveled road shoulder. While the road shoulder is level, Dry Creek situated downslope of the pole site. Given the disturbed nature of the pole site location from past grading activity, there is no potential for special-status plant species, and none were observed during the March 3, 2021 and March 9, 2021 biological resources surveys. The immediate pole location does not provide suitable habitat for special-status wildlife species.

#### Oakville Grade (Site 13)

This monopole site is located on the north side of Oakville Grade, approximately 1.3 miles southwest of the SR 29 in Oakville. The latitude is 38.422111, and the longitude is -122.417017. This pole is approximately 0.10 miles north of Lincoln Creek. The elevation is 430 feet AMSL and the topography of the vicinity is hilly. The surrounding habitat is oak woodland along the slopes and a vineyard to the southeast; however, the pole would be installed on an existing disturbed, ruderal, graveled roadside pullout where there is no potential habitat for special-status plants or wildlife. Other vegetation communities in the BSA include a vineyard to the south. According to the USDA Soil Survey, soils at the pole site consist of Felton gravelly loam (136). The geologic setting is KJgv – sandstone, shale and conglomerate (late Cretaceous to late Jurassic). There is a drainage ditch that parallels the south side of road opposite the pole location, but it should be a safe distance away from construction.

#### Skellenger Lane (Site 14)

This monopole site is located on the south side of Skellenger Lane approximately 0.9 miles west of Silverado Trail near the unincorporated community of Rutherford in western Napa County. The latitude is 38.458361 and the longitude is -122.389864. The elevation is 140 feet AMSL, and the topography is flat. According to the USDA Soil Survey, soils at the pole site consist of Clear Lake clay (117). The geologic setting is Qhay – younger alluvium (late Holocene). The surrounding habitat is ruderal with strips of landscape trees and annual grassland. The surrounding area consists of vineyards with annual grassland vegetation. The pole would be installed on an existing disturbed roadside pullout consisting of annual grasslands. Conn Creek is located about 470 feet to the west and has a sparse riparian corridor along each bank. Given the disturbed nature of the site from past grading activity, there is no potential for special-status plant species, and none were observed during the March 3, 2021 biological resources survey. The location does not provide

suitable habitat for special-status wildlife species. No aquatic features were observed in the vicinity.

#### Deer Park Road (Site 15)

This monopole site is located on the south side of Deer Park Road between the unincorporated communities of Deer Park and Angwin. The latitude is 38.558175, and the longitude is -122.472242. This pole is approximately 0.64 miles southeast of an unnamed tributary to Bell Canyon Reservoir and approximately 0.37 miles northwest of an unnamed tributary to Cañon Creek. The pole would be installed on a paved road shoulder. According to the USDA Soil Survey, soils at the pole site consist of Boomer gravelly loam (109) and Rock outcrop-Kidd complex (177). The geologic setting is Tst – pumiceous ash flow tuff. The surrounding habitat is a mosaic of annual grassland oak woodland and chaparral. No aquatic resources are in the BSA or vicinity. No special-status plant or wildlife species have potential to occur in the paved area.

#### Coombsville (Site 16)

This monopole site is located on the south side of Coombsville Road east of the City of Napa and Silverado Middle School. The latitude is 38.294039, and the longitude is -122.254558. This pole is located approximately 482 feet north of an unnamed tributary of Tulucay Creek. The elevation of the site is 85 feet AMSL, and the site is in relatively flat terrain. The surrounding area is predominately vineyards with annual grasslands. According to the USDA Soil Survey, soils at the pole site consist of Hambright-Rock outcrop complex (151) and Sobrante loam (178). The geologic setting is Tslt – tuff breccia. The pole would be installed on a previously disturbed roadside colonized by annual grasses and weeds. Given the disturbed nature of the site from past grading activity, there is no potential for special-status plant species, and none were observed during the March 3, 2021 biological resources survey. The location does not provide suitable habitat for special-status wildlife species.

#### Silverado Pratt (Site 18)

This monopole site is located on the east side of Silverado Trail North, 0.8 miles northeast of the town of Saint Helena. The latitude is 38.519722, and the longitude is -122.470497. This pole is located approximately 372 feet north of the Napa River. The elevation is 265 feet above AMSL, and the topography in the location transitions from level valley floor to foothills to the west. According to the USDA Soil Survey, soils at the pole site consist of Bale clay loam (104) and Forward silt loam (140). The geologic setting is Qht – terrace deposits (Holocene). The surrounding habitat is oak woodland. Riverine and riparian habitat can be found at the Napa River but is well away from the pole site. The pole would be installed on an existing ruderal graveled roadside lacking vegetation. Given the disturbed nature of the site from past grading activity, there is no potential for special-status plant species, and none were observed during the February 26, 2021 biological resources survey. The pole location does not provide suitable habitat for special-status wildlife species. No aquatic resources were observed in close proximity.

#### Silverado Conn Creek (Site 19)

This monopole site is located on the south side of Silverado Trail just northwest of the Conn Creek Road/Silverado Trail intersection 2.2 miles north of the unincorporated community of Rutherford. The latitude is 38.487507, and the longitude is -122.406589. The elevation is 185 feet AMSL, and the topography is flat. According to the USDA Soil Survey, soils at the pole site consist of Cortina very gravelly loam (124) and Yolo loam (181). The geologic setting is Qhf – alluvial fan deposits (Holocene). The surrounding habitat is mostly vineyards with a narrow strip of remnant oak woodland vegetation lining the south side of Silverado Trail South. The pole would be installed in an existing roadside pullout that is compacted with gravel. Given the disturbed nature of the pole site from past grading activity, there is no potential for special-status plant species, and none were observed during the February 26, 2021 biological resources survey. The location does not provide suitable habitat for special-status wildlife species. Nearby aquatic features include Conn Creek, which is across Silverado Trail to the south. The creek is approximately 319 feet southeast of the site and contains riverine and riparian habitat. There is also a potential ditch/wetland to the east across Silverado Trail, but neither of these features would be impacted by the pole installation.

#### Zinfandel Lane (Site 20)

This monopole site is located on the north side of Zinfandel Lane just southwest of Silverado Trail South approximately 1.9 miles southeast of the Town of Saint Helena. The latitude is 38.496758, and the longitude is -122.424828. The elevation is 195 feet AMSL, and the topography is flat. According to the USDA Soil Survey, soils at the pole site consist of Cortina very gravelly loam (124). The geologic setting is Qhf – alluvial fan deposits (Holocene). The surrounding area is dominated by vineyards with annual grasslands. A fresh emergent wetland is located southwest of the pole site. The pole would be installed on an existing graveled roadside. Given the disturbed nature of the site from past grading activity, there is no potential for special-status plant species and none were observed during the February 26, 2021 biological resources survey. The location does not provide suitable habitat for special-status wildlife species. There is a swale/ditch that drains into the Napa River, which parallels the pole location site to the immediate northwest and would need protection during construction. Napa River is approximately 509 feet southwest of the site.

#### Big Tree Road (Site 21)

This monopole site is located on the north side of Big Tree Road just east of SR 29, about 3.2 miles north of the Town of Saint Helena. The latitude is 38.547297, and the longitude is -122.510043. This pole is located approximately 0.40 miles southeast of the Napa River.

The elevation is 280 feet AMSL, and the immediate surrounding area is flat. According to the USDA Soil Survey, soils at the pole site consist of Bale clay loam (105). The geologic setting is Qhf – alluvial fan deposits (Holocene). The surrounding area consists of vineyards, oak woodland, and landscaped areas. The pole would be installed on a landscaped strip between Big Tree Road and a fire station parking lot. Given the disturbed nature of the site, there is no potential for special-status plant species, and none were observed during the February 26, 2021 biological resources survey. The location does not provide suitable habitat for special-status wildlife species. There is a drainage ditch on the south side of road however. it is not likely to be impacted by pole installation activities.

#### Silverado Deer Park (Site 22)

This monopole site is located on the south side of Deer Park Road near the southeast corner of the Deer Park Road/Silverado Trail North intersection approximately 0.9 miles north of the Town of Saint Helena. The latitude is 38.524442, and the longitude is -122.481475. This pole is located approximately 491 feet northeast of the Napa River. The elevation is 230 feet AMSL, and the topography is flat. According to the USDA Soil Survey, soils at the pole site consist of Bale loam (103), Boomer-Forward-Felta complex (110), and Yolo loam (181). The geologic setting is Qht – terrace deposits (Holocene). The location is surrounded by vineyards, an orchard, and annual grasslands. A fresh emergent wetland is located opposite of the pole location. A narrow strip of coast live oaks line the southeast side of Deer Park Road and some minor tree trimming may be required. The pole would be installed on an existing disturbed roadside that contains sparse ruderal vegetation. There is a ditch/possible wetland along north side of road, however, it will not be impacted by pole installation activities.

#### Silverado Hardman (Site 23)

This monopole site is located on the east side of Silverado Trail in eastern Napa. The latitude is 38.341178, and the longitude is -122.282097. This pole is located approximately 166 feet west of an unnamed tributary to Milliken Creek. The elevation is 40 feet AMSL, and the topography is flat. According to the USDA Soil Survey, soils at the pole site consist of Yolo loam (181). The geologic setting is Qht – terrace deposits (Holocene). Surrounding habitat includes vineyards and barren areas. A narrow strip of oak riparian habitat associated with a drainage lies immediately east of the pole location but the site is otherwise surrounded by vineyards. Pole 23 would be installed on an existing disturbed graveled roadside adjacent to the riparian habitat. Given the disturbed nature of the roadside where the pole would be installed, there is no potential for special-status plant species, and none were observed during the February 26, 2021 biological resources survey. The location does not provide suitable habitat for special-status wildlife species.

#### Airport Boulevard (Site 24)

This monopole site is located on the south side of Airport Boulevard in southern Napa. The latitude is 38.220092, and the longitude is -122.267113. This pole is located approximately 0.54 miles south of Sheehy Creek. The elevation is 40 feet AMSL, and the topography is flat. The pole would be installed at a fire station within an urban/commercial development and the vegetation consists entirely of urban landscape species but most of the location is paved. According to the USDA Soil Survey, soils at the pole site consist of Clear Lake clay (116) and Haire loam (146). The geologic setting is Qhf – alluvial fan deposits (Holocene). Observed plant species consisted entirely of landscape vegetation.

#### Three Peaks (Site IQ 2)

This monopole site is located on the western slope of Three Peaks in the Mayacamas Mountain Range. This location is at latitude 38.613676 and longitude -122.493652. According to the USDA Soil Survey, soils at the pole site consist of (177) Rock outcrop-Kidd complex. The geologic setting is Tsft – tuff. This pole is approximately 682 feet southeast of an unnamed tributary to Swartz Creek. The site was recently graded by the California Department of Forestry and Fire Protection during the 2020 Hennessey Fire. The elevation of the site location is 2,610 feet AMSL, and both are within mountainous terrain. The surrounding habitat consist of montane chaparral, and the site provides highly suitable habitat for special-status plant species.

A free-standing 50' lattice tower, where the tower base and stabilization can be either (1) a small diameter pole inserted up to six (6) feet into the ground and set inside the lattice tower or (2) a small cement foundation pad approximately to 10' (wide) by 10' (long), at appropriate depth, that will also accommodate the ground equipment cabinet and solar panel arrays (s). An alternative to the cement equipment pad can be a max. 10' (wide) by 10' (long) by 4" (thick) fabricated non-slip steel platform, set on four (4) to six (6) max. 20" diameter by 8" tall cement footings.

The ground equipment will include one (1) max. 24" (wide) by 48" (tall) by 36" (deep) weatherproof equipment cabinet, containing IQ hardware/computer and solar battery monitoring equipment. A solar panel array made up of max. four 4-panel sections, with each (of the four) sections is 48" by 48", and affixed to the cement pad or equipment cabinet and oriented for max. solar collection. The IQ camera will be mounted at the top of the 50' pole with a microwave dish (max 36" diameter), mounted below the camera on the pole for data connectivity.

Alternatively, a self-contained trailer site with tilt-up tower may be used.

#### Mt. George (Site IQ 7)

This monopole site is located in the Foote Botanical Preserve, which is owned by the Land Trust of Napa County. The latitude is 38.338603, and the longitude is -122.228011. This pole is approximately 0.71 miles south of Sarco Creek and approximately 1.05 miles north of an unnamed tributary to Milliken Creek. The site is situated on the western slope of Mount George in the Howell Mountain Range in southeastern Napa County. The elevation is 1,020 feet, and the site topography is mountainous. The trailer that would support the pole would be parked in a location that was once a home site. There are numerous seeps and wetlands in the area, and the potential for special-status plants and wildlife species to occur there is high. According to the USDA Soil Survey, soils at the pole site consist of Kidd loam (156) and Rock outcrop (175). The geologic setting is Tsvr – rhyolite flows. The surrounding habitat consists of chaparral, but there is a combination of wetlands, seeps, and non-native species that were planted for landscaping at the home site.

If possible, the proposed pole would be located on an existing concrete foundation/pad in a location that was once a home site. If this is not possible, an adjacent roughly level area, approximately 20' by 30' will need to be used. The pole would be supported on a self-contained outrigger trailer (maximum 25' long) with a telescoping 90' guyed lattice tower. All ground equipment will be located on the trailer.

#### Long Ranch Road (Site IQ 8)

This monopole site is located off of Long Ranch Road in the hills east of Rutherford. The latitude is 38.469305, and the longitude is -122.351266. This pole is located approximately 0.36 miles southwest of an unnamed tributary to Lake Hennessey. The elevation is 1,370 feet AMSL, and the topography is hilly. According to the USDA Soil Survey, soils at the pole site consist of Rock outcrop-Hambright complex (176). The geologic setting is Tsa – Andesite to basalt lava. The surrounding habitat consists of chaparral with vineyards interspersed. The pole would be installed on a disturbed berm adjacent to the vineyard (see representative photos). Special-status plant species could occur in a strip of chaparral habitat immediately adjacent to the pole site. No special-status wildlife species and no aquatic resources were observed in the vicinity.

A free-standing 50' lattice tower, where the tower base and stabilization can be either (1) a small diameter pole inserted up to six (6) feet into the ground and set inside the lattice tower or (2) a small cement foundation pad approximately 10' (wide) by 10' (long), at appropriate depth, that will also accommodate the ground equipment cabinet and solar panel arrays (s). An alternative to the cement equipment pad can be a max. 10' (wide) by 10' (long) by 4" (thick) fabricated non-slip steel platform, set on four (4) to six (6) max. 20" diameter by 8" tall cement footings.

The ground equipment will include one (1) max. 24" (wide) by 48" (tall) by 36" (deep) weatherproof equipment cabinet, containing IQ hardware/computer and solar battery monitoring equipment. A solar panel array made up of max. four 4-panel sections, with each (of the four) sections is 48" by 48", and affixed to the cement pad or equipment cabinet and oriented for max. solar collection. The IQ camera will be mounted at the top of the 50' pole with a microwave dish (max 36" diameter), mounted below the camera on the pole for data connectivity.

#### Foss Valley (Site IQ 15)

This monopole site is located off of Long Ranch Road in the rural hills east of Yountville. The address is 3683 Atlas Peak Road. The latitude is 38.413345, and the longitude is -122.254685. This pole is approximately 0.31 miles south of Milliken Creek and 0.21 miles north of an unnamed tributary to Milliken Creek. The elevation is 1,545 feet AMSL, and the topography is hilly. According to the USDA Soil Survey, soils at the pole site consist of Hambright-Rock outcrop complex (151). The geologic setting is Qha – alluvium (Holocene). The surrounding habitat is mixed chaparral and vineyards. However, the pole would be installed in a graded area adjacent to a vineyard road. Given the disturbed nature of the site from past grading activity, there is no potential for special-status plant species, and none were observed during the biological resources survey. The immediate location does not provide suitable habitat for special-status wildlife species. No aquatic resources were observed in the vicinity.

#### Spring Mountain (Site IQ 19)

This monopole site is located on the Spring Mountain Vineyard property south-west of Spring Mountain Road in the rural hills west of Saint Helena. The latitude is 38.50662, and the longitude is -122.5136. This pole is located approximately 0.41 miles southeast of York Creek and approximately 0.24 miles south of an unnamed tributary to York Creek. The elevation is 1,405 feet AMSL, and the topography is hilly. According to the USDA Soil Survey, soils at the pole site consist of Aiken loam (100), Aiken loam (102), and Boomer gravelly loam (108). The geologic setting is Tst – pumiceous ash flow tufts. Surrounding habitat includes vineyards and montane woodland. The pole would be installed in a mixed hardwood forest, which was recently burned during the 2020 Glass Fire. Many trees, a mix of conifers and oaks, were destroyed. Herbaceous vegetation was beginning to emerge during the April 1, 2021 biological resources survey. No wildlife was observed in the area since the burned area offers no foraging or sheltering opportunities. There is potential for special-status plants at this location since it has undergone little disturbance.

A guyed 75' lattice tower, where the tower base and stabilization can be either (1) a small diameter pole inserted up to six (6) feet into the

ground and set inside the lattice tower or (2) a small cement foundation pad approximately to 10' (wide) by 10' (long), at appropriate depth, that will also accommodate the ground equipment cabinet and solar panel arrays (s). An alternative to the cement equipment pad can be a max. 10' (wide) by 10' (long) by 4" (thick) fabricated non-slip steel platform, set on four (4) to six (6) max. 20" diameter by 8" tall cement footings.

The ground equipment will include one (1) max. 24" (wide) by 48" (tall) by 36" (deep) weatherproof equipment cabinet, containing IQ hardware/computer and solar battery monitoring equipment. A solar panel array made up of max. four 4-panel sections, with each (of the four) sections is 48" by 48", and affixed to the cement pad or equipment cabinet and oriented for max. solar collection. The IQ camera will be mounted at the top of the 75' pole with a microwave dish (max 36" diameter), mounted below the camera on the pole for data connectivity.

#### Co-Located Poles

The following IQ poles will be co-located, which means they will be attached to existing towers. None of these sites were surveyed since there would be no ground disturbance or permanently added footprint.

Gordon Valley (Site IQ 10): This IQ FireWatch site is located on Okell Hill west of Gordon Valley Road. The latitude is 38.326697, and the longitude is -122.122489. The sensor would be installed on an existing tower located at the top of a ridge. It would rise 90' AGL with ground equipment cabinet placed at agreed-on location.

South Atlas Peak (Site IQ 14): This IQ FireWatch site is located on South Atlas Peak, east of Yountville. The site has no address, but it is due west of 4410 Atlas Peak Road. The latitude is 38.441872, and the longitude is -122.258558. The sensor would be installed on an existing tower located on top of a ridge. It would rise 100' AGL with ground equipment cabinet placed at agreed-on location.

Berryessa Peak (Site IQ 17): This IQ FireWatch site is located on Berryessa Peak. The latitude is 38.66351621, and the longitude is -122.1898831. The sensor would be installed on an existing tower located on top of a ridge. It would rise 120' AGL with ground equipment cabinet placed at agreed-on location.

Oat Hill (Site IQ 20): This IQ FireWatch site is located in American Canyon. The latitude is 38.18451356, and the longitude is -122.26379149. The pole would be installed on top of a hill. It would rise 90' AGL with ground equipment cabinet placed at agreed-on location.

10. **Describe the environmental setting and surrounding land uses.** This information is included in the Project Description section above.

11. **Other agencies whose approval is required** (e.g., permits, financing approval, or participation agreement).

The Napa County Public Works Department is the Lead Agency responsible for carrying out the project within the public rights of way. Facilities located within the public right of way are subject to issuance of a Public Works Department encroachment permit. Facilities located outside of the public right of way, consisting of Sites 6/IQ 1, 8, 9, IQ 2, IQ 7, IQ 8, IQ 15, and IQ 19 would generally only trigger various ministerial approvals by the County, including but not limited to building, grading and electrical permits issued by the Planning, Building and Environmental Services Department, in addition to meeting CalFire construction standards.

Permits or other approvals from agencies other than Napa County will be required for the following sites:<sup>^</sup>

Berryessa Peak (Site IQ 17): Firewatch equipment will be collocated on an existing privately owned tower located at a communications compound owned by Bureau of Land Management (BLM). A lease with the primary tenant of the existing private tower will be executed and subject to BLM requirements.

Oat Hill (Site IQ 20): Execution of a lease with the City of American Canyon is required for the Firewatch equipment to collocate on the City's existing communications tower.

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

California Department of Fish and Wildlife: Trustee Agency

#### **Other Agencies Contacted**

None

12. **Tribal Cultural Resources.** Have California Native American tribes traditionally and culturally affiliated with the project area requested

consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resource, procedures regarding confidentiality, etc.?

On March 5, 2021, County Staff sent invitations to consult on the proposed project to Native American tribes who had a cultural interest in the area and who as of that date had requested to be invited to consult on projects, in accordance with the requirements of Public Resources Code section 21080.3.1. Two of the three tribes responded and requested consultation including Yocha Dehe Wintun Nation and Middletown Rancheria of Pomo Indians of California. Preliminary consultations were conducted with both tribes. Site visits were conducted on seven of the sites with the Middletown Rancheria representative, and a video conference was held with Yocha Dehe representative, with both tribal representatives identifying numerous sites as having potential for encountering tribal resources. Both tribes requested tribal monitoring occur during finalization of project plans for each site, and that tribal monitoring occur during construction as determined by each tribe. Mitigation measures include outreach to Mishewal Wappo of Alexander Valley because Yocha Dehe and Middletown Rancheria representatives indicated that the sites for this project fall within the ancestral homelands of all three tribes. In the event Mishewal Wappo representatives are unavailable to review final plans that fall within their ancestral homelands, representatives of Yocha Dehe and Middletown Rancheria indicated they could evaluate those sites and determine if tribal monitoring would occur during construction.

Both tribes provided procedures for the treatment of Native American human remains, grave goods, ceremonial items, and items of cultural patrimony, in the event that any are found in conjunction with development, including archaeological studies, excavation, geotechnical investigations, grading, and any ground disturbing activity. This Protocol also formalizes procedures for Tribal monitoring during archaeological studies, grading, and ground-disturbing activities.

**Note:** Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

**ENVIRONMENTAL IMPACTS AND BASIS OF CONCLUSIONS:**

The conclusions and recommendations contained herein are professional opinions derived in accordance with current standards of professional practice. They are based on a review of the Napa County Environmental Resource Maps, the other sources of information listed in the file, and the comments received, conversations with knowledgeable individuals; the preparer's personal knowledge of the area; and, where necessary, a visit to the site. For further information, see the environmental background information contained in the permanent file on this project.

On the basis of this initial evaluation:

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

John McDowell

May 14, 2021

Signature

Date

Name: John McDowell  
Napa County  
Planning, Building and Environmental Services Department

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

Discussion:

**Regional Setting.** The landscape in Napa County includes rolling hills covered with chaparral brush; steep, rolling hills and narrow ravines; broad valleys and prominent ridges; meandering tree-lined creeks and drainages; oak woodlands; and various agricultural lands, including pasturelands, vineyards, dry farmlands, orchards, and row croplands.

The Napa Valley is characterized by vineyards and wineries with unique architectural styles, as well as gardens and other amenities. By contrast, the mountains, hills, and valleys in the eastern portion of Napa County have a distinctive character, ranging from densely forested groves of redwood, oak, and pine, to shrub and grasslands, to rolling, grass-covered hills punctuated by massive oak trees. Lake Berryessa, a 19,000-acre man-made lake, defines the character of much of eastern Napa County and provides its emphasis on recreation, rather than wine.

Landforms considered to be unique topographic or geologic features within the County include: Mt. St. Helena, Stag's Leap, Calistoga Palisades, Round Hill, Mt. George and Mt. St. John.

**Existing Visual Setting.** The proposed monopoles would be located largely within existing roadway ROW in both incorporated and unincorporated areas of Napa County. The terrain varies from flat roadway areas and building pads, to sloping hillsides.

With the exception of Site 24, all of the proposed monopole sites are located within largely rural landscapes with a range of built and natural features. Sites 1, 2, 3, 4, 5, 10, 11, 14, 15, 16, 19, 20, 21, 22, and 23, are located along existing roadways in mostly flat areas. In these locations, the viewshed is predominated by the existing roadway and adjacent agricultural land/vineyards and/or rural residential development. Existing infrastructure, including utility poles and overhead utility lines, fencing or retaining walls, and graded or paved areas are also visible in the foreground to middleground views. Trees line the roadway at many of these sites. Due to the largely flat terrain, background views include the hillsides and ridgelines, which are important in defining the visual character of the larger Napa Valley. Sites 7, 12, 13, and 18 are also located along existing roadways, but in more hilly terrain. The varied topography creates a more limited viewshed from these locations; however, the roadway with existing utility poles and overhead utility lines, as well as the vegetated hillsides are the prominent visual elements. In these locations, the vegetation around the sites is more dense, limiting scenic vistas from these locations. Site 24 would be located at a fire station within an urban/commercial development. The viewshed in this location consists entirely of urban development and ornamental landscaping.

Sites 6/IQ21, 8, 9/IQ18, IQ2, IQ7, IQ8, IQ10, IQ14, IQ15, and IQ19 are located in remote areas within hilly/mountainous terrain. The viewshed in these locations is dominated by existing vegetation, or in some areas by the charred remains of the burned landscape. Due to their remote locations, built features in these views are limited; however, Sites 6, 8, and 9/IQ18 would be located near existing water tanks and Sites IQ15 and IQ19 would be located in proximity to existing vineyard development. Due to their remote location and intervening topography, these sites are not visible from the nearest public roadways. Sites IQ17, IQ14, IQ10, and IQ20 would be co-located on existing poles and are not anticipated to significantly change the existing viewshed at these locations.

**Regulatory Setting.** A scenic vista is defined as a viewpoint that provides expansive views of a highly valued landscape for the benefit of the general public. The Community Character Element of the Napa County General Plan identifies the County's open, agricultural character as a significant resource to the community and includes goals and policies to preserve the County's existing visual quality and character. Applicable

goals and policies related to visual resources are as follows:

**Goal CC-1:** Preserve, improve, and provide visual access to the beauty of Napa County.

**Goal CC-2:** Continue to promote the diverse beauty of the entire county since this beauty is intricately linked to the continued economic vitality of the region and benefits residents, businesses and visitors.

**Policy CC-1:** The County will retain the character and natural beauty of Napa County through the preservation of open space.

**Policy CC-8:** Scenic roadways which shall be subject to the Viewshed Protection Program are those shown in Figure CC-3, or designated by the Board of Supervisors in the future.

**Policy CC-10:** Consistent with the County's Viewshed Protection Program, new developments in hillside areas should be designed to minimize their visibility from the County's scenic roadways and discourage new encroachments on natural ridgelines. The County shall continue implementation of the Viewshed Protection Program and shall apply the protective provisions of the program to all public projects.

**Policy CC-14:** To the extent allowed by law, telecommunications facilities and transmission lines shall not be located within view of any scenic roadway unless they are sited and designed so as to be virtually invisible to the naked eye from the roadway, are designed to appear as a natural feature of the environment and do not block views or disrupt scenic vistas, or are so well architecturally-integrated into an existing building as to effectively be unnoticeable.

**Goal CC-6:** Preserve and enhance the night environment of the County's rural areas and prevent excessive light and glare.

**Policy CC-31:** The County considers nighttime darkness to be an integral part of the character of the County's rural areas.

**Policy CC-32:** Street lighting on County roadways shall be limited to the minimum amount needed for public safety and shall be designed to focus light only where it is needed.

**Policy CC-34:** Consistent with Building Code requirements for new construction in rural areas, nighttime lighting associated with new developments shall be designed to limit upward and sideways spillover of light. Standards shall be as specified in the most recent update of the "Nonresidential Compliance Manual for California's 2005 Energy Efficiency Standards" or the "Residential Compliance Manual for California's 2005 Energy Efficiency Standards" published by the State of California. Light timers and motion sensors shall be used wherever feasible.

In addition, the County's Viewshed Protection Ordinance, Chapter 18.106 of the Napa County Municipal Code, sets forth hillside development standards to minimize the impact of man-made structures and grading on views from designated public roads in the County. The Viewshed Protection Ordinance is intended to preserve the unique scenic quality of Napa County and protect the ridgelines and hillsides of the County from development that is not sensitive to the surrounding landscape. Specifically, the Viewshed Protection Ordinance, is intended to accomplish the following:

- A. Provide hillside development standards to minimize the impact of man-made structures and grading on views of existing landforms, unique geologic features, existing landscape features and open space as seen from designated public roads within the county;
- B. Protect and preserve views of major and minor ridgelines from designated public roads;
- C. Create a development review process that maximizes administrative, staff level approval of projects which meet administrative standards, while also providing a vehicle for review by the zoning administrator or planning commission of those projects that do not meet the administrative standards;
- D. Minimize cut and fill, earthmoving, grading operations and other such man-made effects on the natural terrain to ensure that finished slopes are compatible with existing land character; and
- E. Promote architecture and designs that are compatible with hillside terrain and minimize visual impacts.

The requirements established in the Viewshed Protection Ordinance apply to all new structures located on slopes of fifteen percent or more or located on a minor or major ridgeline. The provisions of Chapter 18.106 also apply to projects undertaken by public agencies and special districts except for the maintenance of existing county public roads within existing rights-of-way. Zoning regulations do not apply to facilities located within public rights-of-way, and therefore the Viewshed Protection Ordinance does not technically apply. However, it has been the County's practice to apply viewshed protection measures to facilities located within public rights-of-way.

**Scenic Roadways.** According to the Napa County General Plan, approximately 280 miles of county-designated scenic roadways are located in Napa County. Although none of the roads are officially designated as Scenic Highways by the State of California, Segments of State Route 29 (SR 29), SR 121 and SR 221 are eligible for scenic highway designation. Many of the proposed monopole sites are located along designated scenic roadways, including SR 29, Silverado Trail, Deer Park Road, Oakville Grade, Oakville Cross Road, SR 121, SR 128, Chiles Pope Valley Road are all County-designated Scenic Roads.

**Light and Glare.** At nighttime, Napa County, with its largely rural character, is a naturally low-light, dark-sky environment and the County has adopted goals and policies to maintain the dark sky, eliminate glare and reduce light pollution. The majority of the poles will be installed in disturbed poleouts adjacent to existing roads. Streetlights, vehicle head and tail lights, and lighting associated with existing nearby development provide the existing sources of light and glare in these areas. For those monopoles located in more remote areas, existing sources of light and glare are minimal.

a. A scenic vista is defined as a viewpoint that provides expansive views of a highly valued landscape for the benefit of the general public. As described above, the Napa County General Plan identifies the County's rural scenic quality as one of its principal assets and includes policies to maintain the County's scenic beauty, particularly its ridgelines and to protect view corridors from scenic roadways.

The proposed project would install 23 monopoles (Sites 1 through 24) ranging in height from 60 to 85 feet in height above ground level in the County ROW for future use by telecommunication companies. The majority of these monopoles would be located on disturbed areas adjacent to existing roadways. Although the visual setting for many of these areas is characterized by adjacent agricultural, vineyards or undeveloped lands, the proposed monopoles would be located within the roadway ROW, which currently includes existing utility poles and overhead utility lines. None of the visual changes that would result from implementation of these monopoles would have a substantial adverse effect on a scenic vista. Proposed improvements, including the ground-mounted equipment and concrete slab would be low profile and would not block views. The most evident new feature within the viewshed in these locations would be the monopoles themselves, which would extend approximately 60-85 feet high. These poles would be readily visible to motorists and bicyclists on the adjacent public roads, but would be generally consistent with existing infrastructure within the roadway ROW, including but not limited to overhead power and telephone lines and poles, streetlights, guardrails, street signage, and retaining walls. Due to their relatively slender, vertical appearance, they would not be of such physical prominence that their presence would significantly affect a scenic vista.

The proposed project would also install 11 poles containing fire-sensing technology (IQ FireWatch) (Sites IQ1). In order to operate properly, these poles would be mounted at least 15 feet above tree tops and would extend up to 100 feet high. Four would be co-located on existing monopole towers. These IQ sites are primarily located in remote hillside areas, along ridgetops and in mountainous areas and are not visible from publicly-accessible vantage points. Therefore, the proposed project would not result in a substantial adverse effect on a scenic vista. This impact would be less than significant.

b. As described above, no officially designated Scenic Highways are located within Napa County. However, many of the proposed monopole sites are located along County-designated scenic roadways, including SR 29, Silverado Trail, Deer Park Road, Oakville Grade, Oakville Cross Road, SR 121, SR 128, and Chiles Pope Valley Road. Proposed monopoles would primarily be installed in previously disturbed areas, such as poleouts adjacent to existing roads, former building pads or other graded areas. Monopoles proposed in more remote locations would not be visible from any designated scenic roadways, due to the distance from such roadways, as well as, intervening topography and vegetation. Installation of the proposed project may require minor tree trimming at Sites 1, 2, 4, 19, 20, and 22; however, no tree removal is anticipated. As all of the project sites consist of previously disturbed areas, no rock outcroppings or historic buildings would be impacted. Therefore, the Proposed Project would not damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway, and impacts would be less than significant.

c. Installation of the proposed project would not substantially degrade the visual character or quality of the area surrounding the proposed sites. Although the proposed project would install new utility infrastructure, consisting of monopoles (65 to 100 feet high), within the viewshed, the overall visual change would be minor given the presence of existing utility infrastructure of similar form and scale within the viewshed.

Consistent with Policy CC-14 from the County's General Plan, the proposed monopoles located along roadways would be designed to appear as a natural feature of the environment and would not block views or disrupt scenic vistas. As outlined in the project description and shown in Figures 3 and 4, the proposed monopoles located along roadways would be either "monocedar" or "monopine," in order to soften the visual effect and to better blend the monopole into the environment.

All of the proposed monopole sites would be located on previously disturbed areas, either along roadsides, adjacent to existing water tanks, former building pads or other graded areas. Consistent with the requirements of the County's Viewshed Protection Ordinance, the proposed project would not require extensive grading or modification of existing landforms, landscape features or open space. The proposed monopoles along the roadways would be designed to be consistent with existing utility infrastructure and vegetation present in the landscape.

The IQ sites and Site 8 are located in remote hillside areas, which are not visible from publicly-accessible viewpoints due to intervening topography and vegetation. Although these facilities would be located in hillside areas, none of the proposed sites are located on major ridgelines, as identified in Figure 4.14-3, Ridgelines, in the Napa County General Plan. As outlined in the project description, these facilities would consist of either a trailer-mounted tower with solar panels or a telescoping lattice tower with solar battery backup (see Figure 4 images). Although these poles would extend approximately 15 feet above the tree line, these structures would represent a negligible visual change when considered in the larger visual context, which consists of undeveloped, vegetated, hilly terrain. In addition, these facilities would largely be located in proximity to existing development (e.g., water tanks) in order to protect existing views and minimize the impact of man-made structures in hillside areas, in compliance with the County's Viewshed Protection Ordinance.

For the reasons described above, the proposed project would represent a minor, incremental change and would not substantially degrade the

visual character or quality of the surrounding area. This impact would be less than significant.

d. As described above, the majority of the project sites are located along existing roadways in proximity to agricultural land/vineyards and/or rural residential development. Streetlights, vehicle head and tail lights, and lighting associated with existing nearby development provide the existing sources of light and glare in the these areas. For those monopoles located in more remote areas, existing sources of light and glare are minimal .The poles may have some low level operational light indicators. However, the light emitted from these indicators would be minimal and would not create a new source of substantial light or glare that would adversely affect day or nighttime views of the area. No impact would occur.

Mitigation Measures: None required.

II.	AGRICULTURE AND FOREST RESOURCES. <sup>2</sup> Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
	a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Important (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	c) Conflict with existing zoning for, or cause rezoning of, forest land as defined in Public Resources Code Section 12220(g), timberland as defined in Public Resources Code Section 4526, or timberland zoned Timberland Production as defined in Government Code Section 51104(g)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	d) Result in the loss of forest land or conversion of forest land to non-forest use in a manner that will significantly affect timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, or other public benefits?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

Most of the Sites are within County right-of-way (ROW) along graveled or paved road shoulders and these sites have no potential to impact farmland. Given the extent of vineyards throughout Napa County, numerous Sites are located near vineyards including Sites 1, 2, 5, 10, 11, 13, 14, 16, 19, 20, 21, 22, 23, IQ 8, IQ 15, and IQ 19 however none of the poles will be installed within a vineyard and will not require land conversion. Some of the more remote Sites including most of the IQ poles are situated in hills that are on land designated for farming, which is not generally suitable for vineyards or other agricultural crops, but often time is suitable for grazing or animal husbandry. However, the pole installations will have a relatively small footprint (approximately 300 square feet) with a small enclosure or a trailer. These poles would therefore have a Less than Significant potential to impact farming or the potential to farm the sites and their general vicinity.

<sup>2</sup> "Forest land" is defined by the State as "land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits." (Public Resources Code Section 12220(g)) The Napa County General Plan anticipates and does not preclude conversion of some "forest land" to agricultural use, and the program-level EIR for the 2008 General Plan Update analyzed the impacts of up to 12,500 acres of vineyard development between 2005 and 2030, with the assumption that some of this development would occur on "forest land." In that analysis specifically, and in the County's view generally, the conversion of forest land to agricultural use would constitute a potentially significant impact only if there were resulting significant impacts to sensitive species, biodiversity, wildlife movement, sensitive biotic communities listed by the California Department of Fish and Wildlife, water quality, or other environmental resources addressed in this checklist.

a/b/e. The project will not result in the conversion of Prime Farmland, Unique Farmland, Farmland of Statewide Important (Farmland) or existing farmland. No land conversions of any type are proposed.

c/d. The project would not require alterations to forest lands or timberlands and would therefore not conflict with existing zoning of these lands as defined by Public Resources Codes. The pole locations were selected to purposefully avoid impacts to timber, aesthetic, fish and wildlife, biodiversity, water quality, creation, and other public benefits.

Mitigation Measures: None required.

III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

On June 2, 2010, the Bay Area Air Quality Management District's (BAAQMD) Board of Directors unanimously adopted thresholds of significance to assist in the review of projects under the California Environmental Quality Act. These Thresholds are designed to establish the level at which BAAQMD believed air pollution emissions would cause significant environmental impacts under CEQA and were posted on BAAQMD's website and included in BAAQMD's updated CEQA Guidelines (updated May 2012). The Thresholds are advisory and may be followed by local agencies at their own discretion.

The Thresholds were challenged in court. Following litigation in the trial court, the court of appeal, and the California Supreme Court, all of the Thresholds were upheld. However, in an opinion issued on December 17, 2015, the California Supreme Court held that CEQA does not generally require an analysis of the impacts of locating development in areas subject to environmental hazards unless the project would exacerbate existing environmental hazards. The Supreme Court also found that CEQA requires the analysis of exposing people to environmental hazards in specific circumstances, including the location of development near airports, schools near sources of toxic contamination, and certain exemptions for infill and workforce housing. The Supreme Court also held that public agencies remain free to conduct this analysis regardless of whether it is required by CEQA.

In view of the Supreme Court's opinion, local agencies may rely on Thresholds designed to reflect the impact of locating development near areas of toxic air contamination where such an analysis is required by CEQA or where the agency has determined that such an analysis would assist in making a decision about the project. However, the Thresholds are not mandatory and agencies should apply them only after determining that they reflect an appropriate measure of a project's impacts. These Guidelines may inform environmental review for development projects in the Bay Area, but do not commit local governments or BAAQMD to any specific course of regulatory action.

BAAQMD published a new version of the Guidelines dated May 2017, which includes revisions made to address the Supreme Court's opinion. The May 2017 Guidelines update does not address outdated references, links, analytical methodologies or other technical information that may be in the Guidelines or Thresholds Justification Report. The Air District is currently working to revise any outdated information in the Guidelines as part of its update to the CEQA Guidelines and thresholds of significance.

a-b. The mountains bordering Napa Valley block much of the prevailing northwesterly winds throughout the year. Sunshine is plentiful in Napa County, and summertime can be very warm in the valley, particularly in the northern end. Winters are usually mild, with cool temperatures overnight

and mild-to-moderate temperatures during the day. Wintertime temperatures tend to be slightly cooler in the northern end of the valley. Winds are generally calm throughout the county. Annual precipitation averages range from about 24 inches in low elevations to more than 40 inches in the mountains.

Ozone and fine particle pollution, or PM2.5, are the major regional air pollutants of concern in the San Francisco Bay Area. Ozone is primarily a problem in the summer, and fine particle pollution in the winter. In Napa County, ozone rarely exceeds health standards, but PM2.5 occasionally does reach unhealthy concentrations. There are multiple reasons for PM2.5 exceedances in Napa County. First, much of the county is wind-sheltered, which tends to trap PM2.5 within the Napa Valley. Second, much of the area is well north of the moderating temperatures of San Pablo Bay and, as a result, Napa County experiences some of the coldest nights in the Bay Area. This leads to greater fireplace use and, in turn, higher PM2.5 levels. Finally, in the winter easterly winds often move fine-particle-laden air from the Central Valley to the Carquinez Strait and then into western Solano and southern Napa County (BAAQMD, In Your Community: Napa County, April 2016)

The impacts associated with implementation of the project were evaluated consistent with guidance provided by BAAQMD. Ambient air quality standards have been established by state and federal environmental agencies for specific air pollutants most pervasive in urban environments. These pollutants are referred to as criteria air pollutants because the standards established for them were developed to meet specific health and welfare criteria set forth in the enabling legislation. The criteria air pollutants emitted by development, traffic and other activities anticipated under the proposed development include ozone, ozone precursors oxides of nitrogen and reactive organic gases (NOx and ROG), carbon monoxide (CO), nitrogen dioxide (NO2), and suspended particulate matter (PM10 and PM2.5). Other criteria pollutants, such as lead and sulfur dioxide (SO2), would not be substantially emitted by the proposed development or traffic, and air quality standards for them are being met throughout the Bay Area.

BAAQMD has not officially recommended the use of its thresholds in CEQA analyses and CEQA ultimately allows lead agencies the discretion to determine whether a particular environmental impact would be considered significant, as evidenced by scientific or other factual data. BAAQMD also states that lead agencies need to determine appropriate air quality thresholds to use for each project they review based on substantial evidence that they include in the administrative record of the CEQA document. One resource BAAQMD provides as a reference for determining appropriate thresholds is the *California Environmental Quality Act Air Quality Guidelines* developed by its staff in 2010 and as updated through May 2017. These guidelines outline substantial evidence supporting a variety of thresholds of significance.

As mentioned above, in 2010, the BAAQMD adopted and later incorporated into its 2011 CEQA Guidelines project screening criteria (Table 3-1 – Operational-Related Criteria Air Pollutant and Precursors Screening Level Sizes) and thresholds of significance for air pollutants, which have now been updated by BAAQMD through May 2017. The cumulative size of the entire project, which will result in the construction of 24 concrete pads each covering an approximate 300 square foot area, for a total impervious surface of about 7,200 square feet (0.17 acre). The proposed telecommunications facility is not listed in the BAAQMD’s operational criteria pollutant screening list and would therefore not significantly impact air quality requiring further study (BAAQMD CEQA Guidelines, May 2017 Pages 3-2 & 3-3.). The project would contribute an insignificant amount of air pollution and would not result in a conflict or obstruction of an air quality plan. Impacts are considered less than significant.

c. In the short term, potential air quality impacts are most likely to result from earthmoving and construction activities required for project construction. Earthmoving and construction emissions would have a temporary effect; consisting mainly of dust generated during the minor grading associated with leveling the approximately 300 square feet of area for placement of the cement pad, and other construction activities, exhaust emissions from construction related equipment and vehicles, and relatively minor emissions from paints and other coating. During grading and construction activities there would be a minimal amount of air pollutant concentrations and air quality impacts of which would be lessened with utilization of best management practices. The pole locations are situated in non-urban areas and would not expose sensitive receptors, such as hospitals, schools, daycare facilities, elderly housing, and convalescent facilities, to substantial pollutant concentrations. If the proposed project adheres to these relevant best management practices identified by the Air District and the County’s standard conditions of project approval, construction-related impacts are considered less than significant.

#### SITE IMPROVEMENT

##### a. AIR QUALITY

*During all construction activities the permittee shall comply with the most current version of BAAQMD Basic Construction Best Management Practices including but not limited to the following, as applicable:*

- 1. Post a publicly visible sign with the telephone number and person to contact at the lead agency regarding dust complaints. The BAAQMD’s phone number shall also be visible.*
- 2. Water all exposed surfaces (e.g., parking areas, staging areas, soil piles, grading areas, and unpaved access roads) two times per day.*
- 3. Cover all haul trucks transporting soil, sand, or other loose material off-site.*

4. *Remove all visible mud or dirt tracked onto adjacent public roads by using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.*
5. *All vehicle speeds on unpaved roads shall be limited to 15 mph.*
6. *All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.*
7. *Idling times shall be minimized either by shutting off equipment when not in use or reducing the maximum idling time to five (5) minutes (as required State Regulations). Clear signage shall be provided for construction workers at all access points.*

*All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified visible emissions evaluator. Any portable engines greater than 50 horsepower or associated equipment operated within the BAAQMD's jurisdiction shall have either a California Air Resources Board (ARB) registration Portable Equipment Registration Program (PERP) or a BAAQMD permit. For general information regarding the certified visible emissions evaluator or the registration program, visit the ARB FAQ [http://www.arb.ca.gov/portable/perp/perpfaq\\_04-16-15.pdf](http://www.arb.ca.gov/portable/perp/perpfaq_04-16-15.pdf) or the PERP website <http://www.arb.ca.gov/portable/portable.htm>*

Furthermore, while earthmoving and construction on the site will generate dust particulates in the short-term, the impact would be less than significant with dust control measures as specified in Napa County's standard condition of approval relating to dust:

*SITE IMPROVEMENT*

*b. DUST CONTROL*

*Water and/or dust palliatives shall be applied in sufficient quantities during grading and other ground disturbing activities on-site to minimize the amount of dust produced. Outdoor construction activities shall not occur when average wind speeds exceed 20 mph.*

- d. While the Air District defines public exposure to offensive odors as a potentially significant impact, light industrial or manufacturing uses are not known operational producers of pollutants capable of causing substantial negative impacts to sensitive receptors. Construction-phase pollutants will be reduced to a less than significant level by the above-noted standard condition of approval. The project will not create pollutant concentrations or objectionable odors affecting a substantial number of people.

Mitigation Measures: None required.

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

Discussion:

A Biological Constraints analysis was prepared for this project (in May 2021 by WRECO) for ITC and the County. To determine the extent to which the Project may affect biological resources, a Biological Study Area (BSA) was established to encompass the the 34 locations evaluated, along with a 300-foot buffer zone to determine potential direct and indirect impacts to biological resources, including special-status plant and wildlife species and aquatic resources. The following information summarizes potential impacts to special-status species and aquatic resources. Based on habitat requirements for plants and wildlife, biologists determined that the following species could occur at the sites listed in the table below.

Common Name	Scientific Name	Status	Potential for Occurrence	Site
Plants				
Henderson's bent grass	<i>Agrostis hendersonii</i>	CNPS Rank 3.2	Moderate	IQ 7
Napa false indigo	<i>Amropha californica</i> var. <i>napensis</i>	CNPS Rank 1B.2	Moderate	IQ 2
Bent-flowered fiddleneck	<i>Amsinckia lunaris</i>	CNPS Rank 1.B.2	Low	6/IQ 1 IQ 2
Clara Hunt's milk-vetch	<i>Astragalus claranus</i>	FE, SE, CNPS 1.B.1	Low	IQ 19
Narrow-anthered brodiaea	<i>Brodiaea leptandra</i>	CNPS Rank 1B.2	Moderate	IQ 2 IQ 7
Rincon Ridge ceanothus	<i>Ceanothus confusus</i>	CNPS Rank 1B.1	Low	IQ 2 IQ 7
Calistoga ceanothus	<i>Ceanothus divergens</i>	CNPS Rank 1B.2	Low	IQ 2 IQ 7
Holly-leaved ceanothus	<i>Ceanothus purpureus</i>	CNPS Rank 1B.2	High	IQ 2

				IQ 7
Sonoma ceanothus	Ceanothus sonomensis	CNPS Rank 1B.2	Low	IQ 2 IQ 7
Greene's narrow-leaved daisy	Erigeron greenei	CNPS Rank 1B.2	High	IQ 7
Fragrant fritillary	Fritillaria liliacea	CNPS Rank 1B.2	Low	IQ 19
Adobe-lily	Fritillaria pluriflora	CNPS Rank 1B.2	Low	6/IQ 1
Hepson's leptosiphon	Leptosiphon jepsonii	CNPS Rank 1B.2	Low	6/IQ 1 IQ 2
Sonoma beardtongue	Penstemon newberryi var. sonomensis	CNPS Rank 1B.3	Low	IQ 2
California beaked-rush	Rhynchospora californica	CNPS Rank 1B.1	High	IQ 7
Napa checkerbloom	Sidalcea hickmanii ssp. napensis	CNPS Rank 1B.1	High	IQ 7
Napa bluecurls	Trichostema ruygtii	CNPS Rank 1B.2	Low	6/IQ 1 IQ 2 IQ 7 IQ 19
Oval-leaved viburnum	Viburnum ellipticum	CNPS Rank 2B.3	Low	IQ 7
Wildlife				
White-tailed kite	Elanus leucurus	FP	Low	1, 14, 18, 20, 22, 23
Swainson's hawk	Buteo swainsonii	ST	Low	1, 14, 18, 20, 22, 23, 24
Golden eagle	Aquila chrysaetos	FP	Low	4, 7, IQ 18
Burrowing owl	Athene cunicularia	SSC	Low	3, 24
Peregrine falcon	Falco peregrinus anatum	FP	Low	IQ 2, IQ 7
Western red bat	Lasirus blossewillii	SSC	Low	1, 2, 4, 19, 20, 22

Acronyms: CNPS – California Native Plant Society; Rank 1 B – Plants rare, threatened or endangered, Rank 2B – Plants rare, threatened, or endangered in California but more common elsewhere, Rank 3 – Plants being evaluated and require more information.  
Federal Statutes: FE – Federally Endangered  
State Statutes: SE – State Endangered, SSC – Species of Special Concern, FP – Fully Protected, C.F.G.C. – California Fish and Game Code

No aquatic resources, such as wetlands and waters regulated by the U.S. Army Corps of Engineers, Regional Water Quality Control Board, and/or California Department of Fish and Wildlife (CDFW), will be impacted and therefore no permits will be required by those agencies.

The report concluded that vegetation (trees, shrubs, tall grasses) and substrates used for ground-nesting birds are located within the immediate vicinity of the pole locations provide suitable nesting habitat for migratory bird protected by the Federal Migratory Bird Treaty Act and by State Fish and Game Code. There is potential for special-status plant species to occur at the Pole 6/IQ, the IQ 7, and the IQ 19 sites.

Minor tree trimming will be conducted at Sites 1, 2, 4, 19, 20 and 22 and could impact roosting bats.

a-c/f. The pole locations were reviewed by the project biologist and the placement of several monopoles was adjusted or relocated at sites where there was potential to impact any special-status plant or wildlife species, wetlands, creeks, riparian corridors and sensitive natural communities. The permanent footprints of the concrete pads that the poles would be established on are very small, with the typical size being 20 feet by 15 feet (300 square feet). Previously disturbed locations were selected for the telecommunication/broadband pole sites such as graveled roadside pullouts and existing water tank pads therefore potential habitat modification is non-existent to negligible. Seasonally appropriate surveys were conducted in 2021, which due to some areas having burned in the 2020 fires and all areas being subject to drought conditions over the past two rainy seasons, the biologist notes that the sites for telecommunication/broadband monopoles that will not be constructed in 2021 should be reevaluated due to the potential for special status plants to occur at some point in the future. MM BIO-1 requires that a qualified biologist would perform botanical surveys for rare plants during the blooming season at all locations that do not develop in 2021, and that project design of each site be adjusted accordingly to avoid or replace special status plants if they are encountered. Telecommunication/broadband technology allows for some level of flexibility in siting facilities, and as previously noted, the sites do not occupy a large land area which allows

for plant avoidance should they be identified in future surveys.

Based on the botanical survey conducted in Spring 2021, special-status plant species may occur in close proximity to Pole Sites 6/IQ, the IQ 7, and the IQ 19. Site plans for these locations have been adjusted to avoid the areas with potential for special-status plants. These sites are planned for development in summer 2021. To ensure that these areas are not disturbed with the development of the sites, mitigation measure BIO-1 requires the project biologist to flag areas for avoidance prior to commencing construction.

There are seep springs and small scattered wetlands along the existing access road into Pole Site IQ 7 that will require the installation of temporary construction fencing and possibly stormwater control measures to protect those wetland features during the duration of construction activities. The potential for impact to these features is considered minimal although they are in close proximity to the existing minimally improved gravel/dirt access road. Vehicles accessing the site during construction have the potential to impact these wetlands if the vehicles were to leave the roadway and drive through the features during periods when soil is wet or saturated. Construction activities at IQ 7 are anticipated to occur in the summer of 2021 so as to have the Firewatch system operational as soon as possible into the current wildland fire season. As of May 2021, those seep/wetland features are already dry, and anticipated to remain dry through the summer as rain events are quite rare in Napa County over the summer months. As such, potential for stormwater impacts to the nearby wetland features is quite low to negligible. However, to ensure no impacts occur to the features, stormwater pollution prevention measures will be installed in the event summer rainfall event is forecasted when the pole site is being developed. These stormwater control measures are a standard requirement for all development in County. In addition, to ensure vehicles do not leave the road and encroach/disturb the wetland, temporary construction fencing will be installed prior to site improvements commencing under MM BIO-4 would be implemented to protect wetlands. The proposed project would not conflict with the provisions of an adopted Habitat Conservation Plans, Natural Community Conservation Plans or other approved local, regional or state habitat conservation plans. None of the pole locations are within federally designated Critical Habitat for species covered under the Federal Endangered Species Act.

- d. The poles and the concrete pads or trailers that they will be mounted on take up little space and therefore will not interfere or alter the movement of native resident wildlife, migratory wildlife corridors. None of the poles will be installed in aquatic biological resources, therefore they will have not impact on migratory fish. The trees and shrubs located within the immediate vicinity of the project site provide suitable nesting habitat for several avian species. Therefore, as a mitigation measure, MM BIO-2, and a condition of project approval requires that construction activity shall avoid the avian nesting season (February through September). If construction activity shall occur during the nesting season, a qualified biologist shall perform a pre-construction clearance survey to determine the presence/absence of nesting activity near the project site. The survey shall address impacts to nesting birds per the MBTA. If no nesting activity is observed, no further action is required. If nesting activity is observed on or in the immediate vicinity of the project site, construction activity can proceed after the nestlings have fledged. If the facility must be installed near an active nest, a biological monitor shall be present during all construction activity. Construction activity can be conducted at the discretion of the monitor to ensure that it does not directly or indirectly impact nesting birds. Minor tree trimming could impact roosting bats or maternity colonies for bats that roost in vegetation. MM BIO-3 would be implemented in order to avoid impacts to roosting bats.
- e. Minor tree trimming, primarily oaks, will likely be necessary at Sites 1, 2, 4, 19, 20, and 22. Consultation will occur with the County and if tree removal becomes necessary, replacement planting may be necessary. Section 18.108.020 of Chapter 18.108 (Conservation Regulations) of the Napa County Code of Ordinances requires that in the Agricultural Watershed (AW) zoning district, a minimum of seventy percent vegetation canopy cover as configured on an AW zoned parcel existing on June 16, 2016 shall be maintained as part of any use involving earth-disturbing activity. Further requirements to regulate vegetation removal are included in this Chapter including Section 18.108.020 D titled Vegetation Removal Mitigation which requires replacement planting of removed canopy cover at a 3:1 ratio.

#### Mitigation Measures:

##### **MM BIO-1. Botanical Surveys**

For any sites developed after 2021, a qualified botanist will conduct surveys during the blooming season for special-status plants and all special status plant populations will be marked in the field and flagged by the contractor for avoidance. In the event, a special status plants species establish at a monopole site prior to construction, the final site design shall be adjusted or relocated to avoid impact to the plants.

A qualified botanist will conduct surveys during the blooming season for special-status plants at Pole Sites 6/IQ 1, IQ 7, and IQ 19. All special status plant populations will be marked in the field and flagged by the contractor for avoidance.

**MM BIO-2. Preconstruction Nesting Bird Surveys**

- a. For earth-disturbing activities occurring between February 1 and August 31, a qualified biologist (defined as knowledgeable and experienced in the biology and natural history of local avian resources with the potential to occur at the project site) shall conduct a preconstruction surveys for nesting birds within all suitable habitat on the project site, and where there is potential for impacts adjacent to the project areas (typically within 200 feet of project activities). The preconstruction survey shall be conducted no earlier than 14 days prior to when vegetation removal and ground disturbing activities are to commence. Should ground disturbance commence later than 14 days from the survey date, surveys shall be repeated. A copy of the survey shall be provided to the Napa County Conservation Division and the CDFW prior to commencement of work.
- b. After commencement of work if there is a period of no work activity of five days or longer during the bird breeding season, surveys shall be repeated to ensure birds have not established nests during inactivity.
- c. In the event that nesting birds are found, the owner/permittee shall identify appropriate avoidance methods and exclusion buffers in consultation with the County Conservation Division and the U.S. Fish and Wildlife Service (USFWS) and/or CDFW prior to initiation of project activities. Exclusion buffers may vary in size, depending on habitat characteristics, project activities/disturbance levels, and species as determined by a qualified biologist in consultation with County Conservation Division and the USFWS and/or CDFW.
- d. Exclusion buffers shall be fenced with temporary construction fencing (or the like), the installation of which shall be verified by Napa County prior to the commencement of any earthmoving and/or development activities. Exclusion buffers shall remain in effect until the young have fledged or nest(s) are otherwise determined inactive by a qualified biologist.

**MM BIO 3. Preconstruction Bat Surveys**

- a. To the extent practicable, trees will be trimmed from September 1 to March 1, outside of the breeding season, so as not to disturb maternal colonies or roosts.
- b. Prior to construction visual surveys of the trees scheduled for trimming or removal in the Project area should be conducted for bat roosts. If bats are found, the Project biologist will determine if they could be affected by the Project. If it is determined that the bats must be passively or actively excluded, the Project biologist must prepare an exclusion plan.

**MM BIO 4. Wetlands Avoidance**

Prior to construction, a qualified biologist shall identify wetlands at IQ-7 and developed a plan to avoid wetland features during construction of the site including if the site will develop with a portable trailer unit. Avoidance measure will include installation of temporary construction fencing prior to commencing construction placed as directed by the qualified biologist so as to prevent vehicles from leaving the roadway and driving into the wetland features.

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

Discussion:

According to a cultural resources study that was prepared by Basin Research Associates , there are numerous Native American sites throughout Napa County and California Historical Resources Information System (CHRIS) and Northwest Information Center (NWIC) records review noted that 25 of the pole locations were included in previous cultural resources studies while nine locations have not previously been reviewed.

Other findings included the following

- Prehistoric/historic archaeological resources are present at pole location sites 1 and 21.
- No Hispanic era features have been identified in or adjacent to the Project locations.
- No American Period archaeological sites have been recorded, reported, or identified adjacent in or adjacent to the Project locations except for cultural materials associated with the archaeological sites recorded at Locations 1 and 21.
- No listed National Register of Historic Places (NRHP) and/or California Register of Historical Resources (CRHR) are located in or adjacent to the Project locations. The following exceptions apply:

The prehistoric/historic archaeological resource at Location 1 has been determined eligible for inclusion on the NRHP under criterion d for its potential to yield important information regarding the prehistory of the Napa Region and California. The criteria for listing on the CRHR are complimentary to NRHP criteria and the resource appears eligible for inclusion on the CRHR at a minimum under criterion 4. The resource is considered a unique archaeological resource under CEQA.

The prehistoric/historic archaeological resource that includes Location 21 is not eligible for the NRHP. The criteria for listing on the NRHP are complimentary to CRHR criteria and the resource does not appear eligible for inclusion on the CRHR based on the available site observations. The resource is not considered a unique archaeological resource under CEQA.

On March 5, 2021, County Staff sent invitations to consult on the proposed project to Native American tribes who had a cultural interest in the area and who as of that date had requested to be invited to consult on projects, in accordance with the requirements of Public Resources Code section 21080.3.1. Two of the three tribes responded and requested consultation including Yocha Dehe Wintun Nation and Middletown Rancheria of Pomo Indians of California. Preliminary consultations were conducted with both tribes. Site visits were conducted on seven of the sites with the Middletown Rancheria representative, and a video conference was held with Yocha Dehe representative, with both tribal representatives identifying numerous sites as having potential for encountering tribal resources. Both tribes requested tribal monitoring occur during finalization of project plans for each site, and that tribal monitoring occur during construction as determined by each tribe. Mitigation measures include outreach to Mishewal Wappo of Alexander Valley because Yocha Dehe and Middletown Rancheria representatives indicated that the project sites fall within the ancestral homelands of all three tribes. In the event Mishewal Wappo representatives are unavailable to review final plans that fall within their ancestral homelands, representatives of Yocha Dehe and Middletown Rancheria indicated they could evaluate those sites and determine if tribal monitoring would occur during construction.

The 23 telecommunication/broadband sites are generally located within previously disturbed/developed areas consisting of roadside pull outs and adjacency to existing improvements such as community water system water tanks. Many of these areas fall within close proximity to known cultural sites or were likely frequented by Native Americans, such that tribal representatives have indicated that encountering resources is likely. During site visits with the Middletown Rancheria tribal representative, evidence of Native American habitation was found at 5 of the 7 sites visits within the short period of time spent at each site. The 11 IQ Firewatch sites are either collocated on towers, portable trailers, and/or located on ridgeline settings where potential for encountering resources may be less than for monopole sites that are generally located in lower lying or

valley floor settings. However, evidence of Native American habitation was identified at the ridgeline IQ Firewatch site visited by Middletown Rancheria.

Both tribes provided procedures for the treatment of Native American human remains, grave goods, ceremonial items, and items of cultural patrimony, in the event that any are found in conjunction with development, including archaeological studies, excavation, geotechnical investigations, grading, and any ground disturbing activity. This Protocol also formalizes procedures for Tribal monitoring during archaeological studies, grading, and ground-disturbing activities.

- a. As noted in the cultural resource study, potential for encountering human remains outside of a dedicated cemetery is considered low due to site locations, with the exception of Site 1 where mitigation to relocate the site away from the sensitive resource is required as noted below. No information has been encountered that would indicate that construction of the project sites other than Site 1 would encounter human remains. Construction activities would generally occur on previously disturbed areas. However, if resources are found during project grading, construction of the project is required to cease, and a qualified archaeologist would be retained to investigate the site in accordance with standard condition of approval noted above. With mitigation, impacts would be less than significant.

*In the event that archeological artifacts or human remains are discovered during construction, work shall cease in a 50-foot radius surrounding the area of discovery. The permittee shall contact the PBES Department for further guidance, which will likely include the requirement for the permittee to hire a qualified professional to analyze the artifacts encountered and to determine if additional measures are required.*

*If human remains are encountered during project development, all work in the vicinity must be halted, and the Napa County Coroner informed, so that the Coroner can determine if an investigation of the cause of death is required, and if the remains are of Native American origin. If the remains are of Native American origin, the permittee shall comply with the requirements of Public Resources Code Section 5097.98.*

- b. The California State Legislature in Assembly 52, effective July 1, 2015, ensures that local and Tribal governments, public agencies, and project proponents would have information available, early in the project planning process, to identify and address potential adverse impacts to tribal cultural resources. The Public Resources Code establishes that "(a) project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment." (Public Resources Code, 21084.2) To help determine whether a project may have such an effect, the Public Resources Code requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. For the proposed project, consultations pursuant to AB 52 were conducted. As such, the Yocha Dehe Wintun Nation and Middletown Rancheria of Pomo Indians of California responded with a request for tribal monitoring and treatment protocols for handling human remains and cultural items should they be discovered during excavation, geotechnical investigations, grading, and any ground disturbing activity. The following protocols and mitigation measures shall apply to all projects sites to ensure potential impacts to cultural resources are less-than-significant.

#### Mitigation Measures:

#### **Middletown Rancheria Tribal Mitigation Measures:**

Due to the possibility of unearthing tribal cultural resources which include, but is not limited to, Native American human remains, funerary objects, items or artifacts, sites, features, places, landscapes or objects with cultural values to the Middletown Rancheria ("Tribe"), during ground disturbance activities, the following mitigation measures shall be incorporated into the Project for preservation or mitigation of significant impacts to tribal cultural resources.

**MM TCR-1:** Prior to initial ground disturbance, the applicant shall retain a project Tribal Cultural Advisor designated by the Tribe, to direct all mitigation measures related to tribal cultural resources.

**MM TCR-2:** Ground disturbing activities occurring in conjunction with the Project (including surveys, testing, concrete pilings, debris removal, rescrapes, punch lists, erosion control (mulching, waddles, hydroseeding, etc.), pot-holing or auguring, boring, grading, trenching, foundation work and other excavations or other ground disturbance involving the moving of dirt or rocks with heavy equipment or hand tools within the Project area) shall be monitored on a full-time basis by qualified tribal monitor(s) approved by the Tribe. The tribal monitoring shall be supervised by the project Tribal Cultural Advisor. Tribal monitoring should be conducted by qualified tribal monitor(s) approved by the Tribe, who is defined as qualified individual(s) who has experience with

identification, collection and treatment of tribal cultural resources of value to the Tribe. The duration and timing of the monitoring will be determined by the project Tribal Cultural Advisor. If the project Tribal Cultural Advisor determines that full-time monitoring is no longer warranted, he or she may recommend that tribal monitoring be reduced to periodic spot-checking or cease entirely. Tribal monitoring would be reinstated in the event of any new or unforeseen ground disturbances or discoveries.

**MM TCR-3:** The project Tribal Cultural Advisor and tribal monitor(s) may halt ground disturbance activities in the immediate area of discovery when known or suspected tribal cultural resources are identified until further evaluation can be made in determining their significance and appropriate treatment or disposition. There must be at minimum one tribal monitor for every separate area of ground disturbance activity that is at least 30 meters or 100 feet apart unless otherwise agreed upon in writing between the Tribe and applicant. Depending on the scope and schedule of ground disturbance activities of the Project (e.g., discoveries of cultural resources or simultaneous activities in multiple locations that requires multiple tribal monitors, etc.) additional tribal monitors may be required on-site. If additional tribal monitors are needed, the Tribe shall be provided with a minimum of three (3) business days advance notice unless otherwise agreed upon between the Tribe and applicant. The on site tribal monitoring shall end when the ground disturbance activities are completed, or when the project Tribal Cultural Advisor have indicated that the site has a low potential for tribal cultural resources.

**MM TCR-4:** All on-site personnel of the Project shall receive adequate cultural resource sensitivity training approved by the project Tribal Cultural Advisor or his or her authorized designee prior to initiation of ground disturbance activities on the Project. The training must also address the potential for exposing subsurface resources and procedures if a potential resource is identified. The Project applicant will coordinate with the Tribe on the cultural resource sensitivity training.

**MM TCR-5:** The Project applicant must meet and confer with the Tribe, at least 45 days prior to commencing ground disturbance activities on the Project to address notification, protection, treatment, care and handling of tribal cultural resources potentially discovered or disturbed during ground disturbance activities of the Project. All potential cultural resources unearthed by Project activities shall be evaluated by the project Tribal Cultural Advisor. The Tribe must have an opportunity to inspect and determine the nature of the resource and the best course of action for avoidance, protection and/or treatment of tribal cultural resources to the extent permitted by law. If the resource is determined to be a tribal cultural resource of value to the Tribe, the Tribe will coordinate with the Project applicant to establish appropriate treatment and disposition of the resources with appropriate dignity which may include reburial or preservation of resources. The Project applicant must facilitate and ensure that the determination of treatment and disposition by the Tribe is followed to the extent permitted by law. No laboratory studies, scientific analysis, collection, curation, or video recording are permitted for tribal cultural resources without the prior written consent of the Tribe.

### **Yocha Dehe Tribal Mitigation Measures**

**MM CULT-1** If any prehistoric or historic subsurface cultural resources are discovered during ground-disturbing activities, all work within 100 feet of the resources shall be halted and a qualified archaeologist shall be consulted to assess the significance of the find according to CEQA Guidelines Section 15064.5. If any find is determined to be significant, representatives from the County and the archaeologist shall meet to determine the appropriate avoidance measures or other appropriate mitigation. All significant cultural materials recovered shall be, as necessary and at the discretion of the consulting archaeologist, subject to scientific analysis, professional museum curation, and documentation according to current professional standards. In considering any suggested mitigation proposed by the consulting archaeologist to mitigate impacts to historical resources or unique archaeological resources, the County shall determine whether avoidance is necessary and feasible in light of factors such as the nature of the find, project design, costs, and other considerations.

If avoidance is infeasible, other appropriate measures (e.g. data recovery) shall be instituted. Work may proceed on the other parts of the project site while mitigation for historical resources or unique archaeological resources is being carried out.

Mitigation Measure CULT-1 is included in this analysis as a way to protect unknown cultural resources that could be buried underneath the ground surface and would not be discovered until grading activities commenced for the proposed project. If no cultural resources are found during construction, none of the actions described in MM CULT-1 are required.

In the event that Native American human remains, grave goods, ceremonial items, and items of cultural patrimony are found in conjunction with development, including archaeological studies, excavation, geotechnical investigations, grading, and any ground

disturbing activity, the treatment procedures prepared by the Yocha Dehe Wintun Nation shall be followed, and are described in MM CULT-2.

**MM CULT-2:** Whenever Native American human remains are found during the course of a Project, the determination of Most Likely Descendant (“MLD”) under California Public Resources Code Section 5097.98 will be made by the Native American Heritage Commission (“NAHC”) upon notification to the NAHC of the discovery of said remains at a Project site. If the location of the site and the history and prehistory of the area is culturally-affiliated with the Tribe, the NAHC contacts the Tribe; a Tribal member will be designated by the Tribe to consult with the landowner and/or project proponents.

Should the NAHC determine that a member of an Indian tribe other than Yocha Dehe Wintun Nation is the MLD, and the Tribe is in agreement with this determination, the terms of this Protocol relating to the treatment of such Native American human remains shall not be applicable; however, that situation is very unlikely.

#### **Treatment of Native American Remains**

In the event that Native American human remains are found during development of a Project and the Tribe or a member of the Tribe is determined to be MLD pursuant to Section II of this Protocol, the following provisions shall apply. The Medical Examiner shall immediately be notified, ground disturbing activities in that location shall cease and the Tribe shall be allowed, pursuant to California Public Resources Code Section 5097.98(a), to (1) inspect the site Yocha Dehe Wintun Nation *PO Box 18 Brooks, California 95606 p) 530.796.3400 f) 530.796.2143 www.yochadehe.org* of the discovery and (2) make determinations as to how the human remains and grave goods should be treated and disposed of with appropriate dignity.

The Tribe shall complete its inspection and make its MLD recommendation within forty-eight (48) hours of getting access to the site. The Tribe shall have the final determination as to the disposition and treatment of human remains and grave goods. Said determination may include avoidance of the human remains, reburial on-site, or reburial on tribal or other lands that will not be disturbed in the future. The Tribe may wish to rebury said human remains and grave goods or ceremonial and cultural items on or near the site of their discovery, in an area which will not be subject to future disturbances over a prolonged period of time. Reburial of human remains shall be accomplished in compliance with the California Public Resources Code Sections 5097.98(a) and (b).

The term "human remains" encompasses more than human bones because the Tribe's traditions call for the burial of associated cultural items with the deceased (funerary objects), and/or the ceremonial burning of Native American human remains, funerary objects, grave goods and animals. Ashes, soils and other remnants of these burning ceremonies, as well as associated funerary objects and unassociated funerary objects buried with or found near the Native American remains are to be treated in the same manner as bones or bone fragments that remain intact.

#### **Non-Disclosure of Location of Reburials**

Unless otherwise required by law, the site of any reburial of Native American human remains shall not be disclosed and will not be governed by public disclosure requirements of the California Public Records Act, Cal. Govt. Code § 6250 et seq. The Medical Examiner shall withhold public disclosure of information related to such reburial pursuant to the specific exemption set forth in California Government Code Section 6254(r). The Tribe will require that the location for reburial is recorded with the California Historic Resources Inventory System (“CHRIS”) on a form that is acceptable to the CHRIS center. The Tribe may also suggest that the landowner enter into an agreement regarding the confidentiality of site information that will run with title on the property.

#### **Treatment of Cultural Resources**

Treatment of all cultural items, including ceremonial items and archeological items will reflect the religious beliefs, customs, and practices of the Tribe. All cultural items, including ceremonial items and archeological items, which may be found at a Project site should be turned over to the Tribe for appropriate treatment, unless otherwise ordered by a court or agency of competent jurisdiction. The Project Proponent should waive any and all claims to ownership of Yocha Dehe Wintun Nation *PO Box 18 Brooks, California 95606 p) 530.796.3400 f) 530.796.2143 www.yochadehe.org* Tribal ceremonial and cultural items, including archeological items, which may be found on a Project site in favor of the Tribe. If any intermediary, (for example, an archaeologist retained by the Project Proponent) is necessary, said entity or individual shall not possess those items for longer than is reasonably necessary, as determined solely by the Tribe.

#### **Inadvertent Discoveries**

If additional significant sites or sites not identified as significant in a Project environmental review process, but later determined to be significant, are located within a Project impact area, such sites will be subjected to further archeological and cultural significance evaluation by the Project Proponent, the Lead Agency, and the Tribe to determine if additional mitigation measures are necessary to treat sites in a culturally appropriate manner consistent with CEQA requirements for mitigation of impacts to cultural resources.

If there are human remains present that have been identified as Native American, all work will cease for a period of up to 30 days in accordance with Federal Law.

- c. State CEQA Guidelines Section 15064.5 (e) requires that excavation activities be stopped whenever human remains are uncovered and that the county coroner be called in to assess the remains. If the county coroner determines that the remains are those of Native Americans, the Native American Heritage Commission must be contacted within 24 hours. At that time, the lead agency must consult the appropriate Native Americans, if any, as timely identified by the Native American Heritage Commission. Section 15064.5 directs the lead agency (or applicant), under certain circumstances to develop an agreement with the Native Americans for the treatment and disposition of the remains.

In addition to the mitigation provisions pertaining to accidental discovery of human remains, the State CEQA Guidelines also require that a lead agency make provisions for the accidental discovery of historical or archaeological resources, generally. Pursuant to Section 15064.5, subdivision (f), these provisions should include “an immediate evaluation of the find by a qualified archaeologist. If the find is determined to be an historical or unique archaeological resource, contingency funding and a time allotment sufficient to allow for implementation of avoidance measures or appropriate mitigation should be available. Work could continue on other parts of the building site while historical or unique archaeological resource mitigation takes place.”

The mitigation measure proposed in CULT-3 is included in this analysis to reduce and minimize potential impacts on human remains should they be discovered during construction activity.

**MM CULT-3** If human skeletal remains are uncovered during construction, the construction contractor shall immediately halt work within 100 feet of the find, contact the Napa County Coroner to evaluate the remains, and follow the procedures and protocols set forth in Section 15064.5(e)(1) of the CEQA Guidelines. If the County Coroner determines that the remains are Native American, the project applicant shall contact the Native American Heritage Commission, in accordance with Health and Safety Code Section 7050.5, subdivision (c), and Public Resources Code 5097.98 (as amended by AB 2641). Per Public Resources Code 5097.98, the construction contractor shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the human remains are located, is not damaged or disturbed by further development activity until the project applicant has discussed and conferred, as prescribed in section (California Public Resources Code Section 5097.98), with the most likely descendants regarding their recommendations, if applicable, taking into account the possibility of multiple human remains.

No known human remains have been identified onsite, however, this mitigation measure is included as a way to protect previously undiscovered human remains that could be buried underneath the ground surface and would not be discovered until grading activities commenced for the proposed project. If no human remains are found during construction, none of the actions described in CULT-3 are required. For these reasons, potential impacts are considered less than significant with mitigation incorporated.

The mitigation measure proposed in CULT-4 is included in this analysis to reduce and minimize potential impacts on cultural resources that are described in the cultural resources study.

**MM CULT-4** Pole Locations 1 will be relocated in the same vicinity at the current location to avoid the recorded cultural site. The Project archaeologist and Native American tribes will be consulted to guide the relocation process.

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

Discussion:

a-b. The proposed operation will not expose members of the General Public to hazardous levels of RF energy and will not contribute to existing cumulative MPE levels on walkable surfaces at ground or in adjacent buildings by 5% of the General Population limits. Telecommunication and broadband facilities are regulated by the Federal Communication Commission (FCC) All facilities must be designed to comply FCC requirements limiting the extent of hazardous levels of RF energy and public exposure guidelines. Due to their mounting location and height, the antennae would not be accessible to unauthorized persons, and so no mitigation measures are necessary to comply with the FCC public exposure guidelines. It is presumed that both telecommunications facilities will, as an FCC licensee take adequate steps to ensure that its employees or contractors receive appropriate training and comply with FCC occupational exposure guidelines whenever work is required near the antennas themselves.

The project will comply with the prevailing standards for limiting public exposure to radio frequency energy and, therefore, will not for this reason cause a significant impact on the environment. As a condition of project approval, the applicants shall post RF alerting signage with contact information (Caution 2B) at the base of the Monopine to inform authorized climbers of potential conditions near the antennas. Therefore, these impacts would be considered less than significant.

Additionally, as a condition of project approval, the applicant would be required to utilize Best Management Practices during grading, trenching and construction activities as well as during operational practices. Furthermore, as discussed in the **Section III Air Quality** of this Initial Study above, Napa County has been working to develop a Climate Action Plan (CAP). Information on the County CAP can be obtained at the Napa County Department of Planning, Building and Environmental Services or <http://www.countyofnapa.org/CAP/>. Compliance with the Napa County CAP would further reduce the project's energy usage. Energy would be consumed during the operational phase of the project.

In addition, vehicle trips associated during operation would consume gasoline when employees would visit and monitor the site approximately once a month. Adherence to policies outlined in the County CAP would ensure reduced energy use during operations would not be inefficient, and would result in a less than significant impact.

Compliance with the County CAP Building Energy Use measures, the California Building Code, and Best Management Practices would further reduce emissions and ensure no overall environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. Therefore, these impacts would be considered less than significant.

**Mitigation Measures:** None required.

VII.	GEOLOGY AND SOILS. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
	a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
	i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	d) Be located on expansive soil creating substantial direct or indirect risks to life or property? Expansive soil is defined as soil having an expansive index greater than 20, as determined in accordance with ASTM (American Society of Testing and Materials) D 4829.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion:

The proposed pole locations are scattered throughout Napa County in varied terrain ranging from rocky hill tops to alluvial flood plains. Poles located within public right-of-way will generally occur along unimproved shoulders and pull outs adjacent to existing paved road. These areas tend to be highly altered consisting of areas of fill and/or hillside cuts. IQ FireWatch towers will be located primarily within hilltop and ridgeline areas. Site specific soils and geologic settings are included in the project description.

Like many areas of California, most of Napa County is susceptible to seismic activity and geologic hazards including landslides, lateral spreading, subsidence, liquefaction or collapse as noted below:

- a.
  - i.) Fault Zones in Napa County include:
    - Cuttings Wharf, with fault lines extending on a north, south orientation from South of the City of American Canyon, north to State Route 12 in the Caneros Region
    - Napa, which extends from the Cuttings Wharf faults along the western foothills of the Mayacamas Range in west Napa Valley to Redwood Creek at the northern Napa City Limits; and,
    - Mount George, part of the Concord-Green Valley Fault, connects with the Cordelia Fault Zone to the south in Solano County and extends north to Wooden Valley along the eastern side of Mount George.

According to the most recent Alquist-Priolo Earthquake Fault Zoning Map; Poles IQ 7, 23, and 16 are 2.5 to 5 miles west of the Mt. George Fault Zone. Poles 3 and 24 are within one mile of the Cuttings Wharf Fault Zone. Installation of the monopoles will result in very little ground disturbance. IQ poles will be mounted on trailers therefore no ground disturbance is associated. Neither method would directly or indirectly cause the rupturing of an earthquake fault. As such, the proposed project would result in no impact with regards to rupturing a known fault.

- ii.) All areas of the Bay Area are subject to strong seismic ground shaking. Construction of the project would be required to comply with the latest building standards and codes, including the California Building Code that would reduce any potential impacts to a less than significant level.
- iii.) No subsurface conditions have been identified on the project site that indicated a susceptibility to seismic-related ground failure or liquefaction. As the project involves a minimal physical change to the site, there would be a less than significant impact in regards to seismic related ground-failure and liquefaction.
- iv.) According to the California Department of Conservation Landslide Inventory Map, there are numerous landslide areas mapped in the Mayacamas Mountain Range to the west of Napa Valley and also in the east and north in the Howell Mountain/Mt. George Range. There are also numerous landslide areas mapped west of Lake Berryessa. As the project involves a minimal physical change to the site, there would be a less than significant impact in regards to landslides.

Installation of the proposed poles and ground mounted equipment will not result in a discernable change to geologic hazard conditions within Napa County. Each pole and associated ground mounted equipment will be required to comply with the seismic and geologic hazard requirements of the California Building Code (CBC)/International Building Code (IBC). Per Chapter 16, Section 1613.1 of the CBC, structures, including associated non-structural components that are permanently attached to the structures and supports and attachments must be designed and constructed to resist the effects of earthquake motions. Per Chapter 18, Section 1803.1 of the CBC, where required by a building official or where geotechnical investigations involve in-situ testing, laboratory testing or engineering calculations such as investigations must be conducted by a registered design engineer. The building codes ensures that structures of this nature to not pose a hazard as a result of complying with the code. Soils reports will be required to ensure that footing/foundation designs are compatible with the geologic conditions at each site. Soils report will identify if any of the Sites within an area of high geologic hazard, such as a fault zone, high liquefaction area or landslide area further. In the unlikely event that the final soil report indicates that a proposed pole location cannot be designed to comply with the IBC, that pole site will be considered for relocation.

- b/c/d. The project would require geotechnical investigations to ensure site stability and incorporation of best management practices during operations and would be subject to the Napa County Stormwater Ordinance, as applicable. As there is minimal physical change occurring on-site as a result of the project, there would be less than significant no impacts related to soil erosion or loss of topsoil.
- e. As the proposed project does not include the installation of septic tanks or alternative disposal of wastewater, there would be no impact related to soils capable of disposal of wastewater, and no mitigation would be required.
- f. Potential for encountering paleontological resources is evaluated in Section VII, and indicates that sensitive resources could be encountered when excavation occurs in previously undisturbed soil and bedrock, as well as previously developed areas. Per Policy CC-23 in the Napa County General Plan in areas where potential or unanticipated paleontological resources are discovered the County must be immediately notified. The implementation of the following Mitigation Measure GEO-1, which requires that excavation activities be halted should a paleontological resource be encountered and the curation of any substantial find, would reduce this impact to a less-than significant level.

#### Mitigation Measures:

**MM GEO-1:** Should paleontological resources be encountered during project subsurface construction activities located in previously undisturbed soil and bedrock, all ground-disturbing activities within 100 feet shall be halted and a qualified paleontologist contacted to assess the situation, consult with agencies as appropriate, and make recommendations for the treatment of the discovery. For purposes of this mitigation, a "qualified paleontologist" shall be an individual with the following qualifications: 1) a graduate degree in paleontology or geology and/or a person with a demonstrated publication record in peer-reviewed paleontological journals; 2) at least two years of professional experience related to paleontology; 3) proficiency in recognizing fossils in the field and determining their significance; 4) expertise in local geology, stratigraphy, and biostratigraphy; and 5) experience collecting vertebrate fossils in the field.

If the paleontological resources are found to be significant and project activities cannot avoid them, measures shall be implemented to ensure that the project does not cause a substantial adverse change in the significance of the paleontological resource. Measures may include monitoring, recording the fossil locality, data recovery and analysis, a final report, and accessioning the fossil material and technical report to a paleontological repository. Upon completion of the assessment, a report documenting methods, findings, and recommendations shall be prepared and submitted to the County for review. If paleontological materials are recovered, this report also shall be submitted to a paleontological repository such as the University of California Museum of Paleontology, along with significant paleontological materials. Public educational outreach may also be appropriate.

The Project sponsor shall inform its contractor(s) of the sensitivity of the project site for paleontological resources and shall verify that the following directive has been included in the appropriate contract specification documents:

“The subsurface of the construction site may contain fossils. If fossils are encountered during project subsurface construction, all ground-disturbing activities within 50 feet shall be halted and a qualified paleontologist contacted to assess the situation, consult with agencies as appropriate, and make recommendations for the treatment of the discovery. Project personnel shall not collect or move any paleontological materials. Fossils can include plants and animals, and such trace fossil evidence of past life as tracks or plant imprints. Marine sediments may contain invertebrate fossils such as snails, clam and oyster shells, sponges, and protozoa; and vertebrate fossils such as fish, whale, and sea lion bones. Vertebrate land mammals may include bones of mammoth, camel, saber tooth cat, horse, and bison. Contractor acknowledges and understands that excavation or removal of paleontological material is prohibited by law and constitutes a misdemeanor under California Public Resources Code, Section 5097.5.”

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VIII.	GREENHOUSE GAS EMISSIONS. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
	a) Generate a net increase in greenhouse gas emissions in excess of applicable thresholds adopted by the Bay Area Air Quality Management District or the California Air Resources Board which may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	b) Conflict with a county-adopted climate action plan or another applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion:

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

In July 2015, the County re-commenced preparation of the CAP to: i) account for present day conditions and modeling assumptions (such as but not limited to methods, emission factors, and data sources), ii) address the concerns with the previous CAP effort as outlined above, iii) meet applicable State requirements, and iv) result in a functional and legally defensible CAP. On April 13, 2016 the County, as the part of the first phase of development and preparation of the CAP, released Final Technical Memorandum #1: 2014 Greenhouse Gas Emissions Inventory and Forecast, April 13, 2016. This initial phase included: i) updating the unincorporated County's community-wide GHG emissions inventory to 2014, and ii) preparing new GHG emissions forecasts for the 2020, 2030, and 2050 horizons. Additional information on the County CAP can be obtained at the Napa County Department of Planning, Building and Environmental Services or <http://www.countyofnapa.org/CAP/>.

a/b. Overall increases in Greenhouse Gas (GHG) emissions in Napa County were assessed in the Environmental Impact Report (EIR) prepared for the Napa County General Plan Update and certified in June 2008. GHG emissions were found to be significant and unavoidable in that document, despite the adoption of mitigation measures incorporating specific policies and action items into the General Plan. Consistent with these General Plan action items, Napa County participated in the development of a community-wide GHG emissions inventory and "emission reduction framework" for all local jurisdictions in the County in 2008-2009. This planning effort was completed by the Napa County Transportation and Planning Agency in December 2009, and served as the basis for development of a refined inventory and emission reduction plan for unincorporated Napa County.

In 2011, the Bay Area Air Quality Management District (BAAQMD) released California Environmental Quality Act (CEQA) Project Screening Criteria and Significance of Thresholds [1,100 metric tons per year (MT) of carbon dioxide and carbon dioxide equivalents (CO<sub>2</sub>e)]. This threshold of significance is appropriate for evaluating projects in Napa County. During our ongoing planning effort, the County requires project applicants to consider methods to reduce GHG emissions consistent with Napa County General Plan Policy CON-65(e). (Note: Pursuant to State CEQA Guidelines Section 15183, because this initial study assesses a project that is consistent with an adopted General Plan for which an environmental impact report (EIR) was prepared, it appropriately focuses on impacts which are "peculiar to the project," rather than the cumulative impacts previously assessed.) For the purposes of this analysis potential GHG emissions associated with project 'construction' and 'development' and with 'ongoing' winery operations have been discussed.

GHGs are the atmospheric gases whose absorption of solar radiation is responsible for the greenhouse effect, including carbon dioxide, methane, ozone, and the fluorocarbons, that contribute to climate change (a widely accepted theory/science explain human effects on the atmosphere). Carbon Dioxide (CO<sub>2</sub>) gas, the principal greenhouse gas (GHG) being emitted by human activities, and whose concentration in the atmosphere is most affected by human activity, also serves as the reference gas to compare other greenhouse gases. Agricultural sources of carbon emissions include forest clearing, land-use changes, biomass burning, and farm equipment and management activity emissions ([http://www.climatechange.ca.gov/glossary/letter\\_c.html](http://www.climatechange.ca.gov/glossary/letter_c.html)). Equivalent Carbon Dioxide (CO<sub>2</sub>e) is the most commonly reported type of GHG emission and a way to get one number that approximates total emissions from

all the different gasses that contribute to GHG (BAAMD CEQA Air Quality Guidelines, May 2017). In this case, carbon dioxide (CO<sub>2</sub>) is used as the reference atom/compound to obtain atmospheric carbon CO<sub>2</sub> effects of GHG. Carbon stocks are converted to carbon dioxide equivalents (CO<sub>2</sub>e) by multiplying the carbon total by 44/12 (or 3.67), which is the ratio of the atomic mass of a carbon dioxide molecule to the atomic mass of a carbon atom (<http://www.nciasi2.org/COLE/index.html>)

One time "Construction Emissions" associated with the project include: emissions associated with the energy used to develop and prepare the project area, construction, and construction equipment and worker vehicle trips (hereinafter referred to as Equipment Emissions). These emissions also include underground carbon stocks (or Soil carbon) associated with any existing vegetation that is proposed to be removed. As previously stated, this project includes conversion of a building within the industrial including construction of an accessory building, replacement landscaping and expansion of the parking lot.

In addition to the one time Construction Emissions, "Operational Emissions" of the project are also considered and include: i) any reduction in the amount of carbon sequestered by existing vegetation that is removed as part of the project compared to a "no project" scenario (hereinafter referred to as Operational Sequestration Emissions); and ii) ongoing emissions from the energy used to maintain and operate the winery, including vehicle trips associated with employee and visitor trips (hereinafter referred to as Operational Emissions). See Section XVI, Transportation/Traffic, for anticipated number of operational trips. Operational Emissions from the proposed project would be the primary source of emissions over the long-term when compared to one time construction emissions.

As discussed in the Air Quality section of this Initial Study, in 2010, the BAAQMD adopted and later incorporated into its 2011 CEQA Guidelines project screening criteria (Table 3-1 – Criteria Air Pollutants and Precursors & GHG Screening Level Sizes) and thresholds of significance for air pollutants, including GHG emissions, which have now been updated by BAAQMD through May 2017. Nature of this project is quite minimal in both final scope of new development as well as the extent of construction activity that is necessary to implement it. Comparison of this development, which consists of 33 monopoles with small ground mounted enclosures, to BAAQMD screening criteria indicated that the project is well below thresholds for contributing a significant amount of GHG emissions into the environment. By way of example, the screening criteria for an industrial warehouse building having a potential to contribute significantly to GHG emissions is a development containing 121,000 sq. ft. of building area with associated parking areas and loading docks. By comparison these 34 sites throughout the County will generate virtually no vehicles only requiring occasional visits for maintenance and upkeep, and total area of development for all sites combined, which are passive in nature, and constitute less than 10,000 sq. ft. of total development area for all site combined. The intensity of use and the total area of land use is far less than the near comparison land use category, being warehouse development, which has a 121,000 sq. ft. threshold. The project sites individually, and consider cumulative together, will produce well below 1,100 MT of CO<sub>2</sub> per year, and the project was determined not to exceed the 1,100 MT of CO<sub>2</sub>e/yr GHG threshold of significance.

The proposed project has been evaluated against the BAAQMD thresholds and determined that the project would not exceed the 1,100 MT/yr of CO<sub>2</sub>e. GHG Emission reductions from local programs and project level actions, such as application of the Cal Green Building Code, tightened vehicle fuel efficiency standards, and more project-specific on-site programs including those winery features noted above would combine to further reduce emissions below BAAQMD thresholds. As indicated above, the County is currently preparing a CAP and as the part of the first phase of development and preparation of the CAP has released Final Technical Memorandum #1 (2014 Greenhouse Gas Emissions Inventory and Forecast, April 13, 2016). Table 1 of the Technical Memorandum indicates that 2% of the County's GHG emissions in 2014 were a result of land use change. The increase in emissions expected as a result of the project would be relatively modest and the project is in compliance with the County's efforts to reduce emissions as described above. For these reasons, project impacts related to GHG emissions are considered less than significant.

Mitigation Measures: None required.

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IX.	HAZARDS AND HAZARDOUS MATERIALS. Would the project	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
	a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	b) Create a significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wild-land fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

- a. The proposed project will not involve the transport of hazardous materials. No impacts would occur
- b. The construction will require minimal excavation at each pole site. Hazardous materials such as diesel, maintenance fluids, and paints would be used onsite during construction. Should they be stored onsite, these materials would be stored in secure locations to reduce the potential for upset or accident conditions. Therefore, it would not be reasonably foreseeable for the proposed project to create upset or accident conditions that involve the release of hazardous materials into the environments. Impact are considered less than significant, and no mitigation is required.
- c. According to Google Earth, the grounds of the Silverado Middle School is 1/10<sup>th</sup> of a mile west of the Pole 16 location. There are no schools located within one-quarter mile of any of the pole sites. Pole IQ 20, which will be co-located on an existing pole is 2/10<sup>ths</sup> of a mile southeast of A Bright Future Academy, north of the City of American Canyon. However, as stated in **Section VIII (b)** above, the operational use of the project would not include hazardous materials or substances. Therefore, the impacts would be considered less than significant, and no mitigation would be required.
- d. Based on a search of the State of California Water Boards GeoTracker there are Leaking Underground Storage Tank Site (LUST) within close proximity to the following poles:
  - Pole 2 is located near an entrance to the Napa County Yountville Corporate Yard which was a LUST Cleanup Site with the status of cleanup listed as complete.
  - Pole 4 is located adjacent to a LUST Cleanup Site titled Spanish Flat Service with the status of cleanup listed as complete.
  - Pole 10 is located in close proximity to a LUST Cleanup Site titled Pope Valley Garage with the status of cleanup listed as complete.
  - Pole 11 is located in close proximity to a LUST Cleanup Sites titled Moskowite Corner and Corners Service Stations with the status of cleanup for both listed as complete.

- Pole 21 is located on the grounds of a LUST Cleanup Site titled Silverado Service Center with the status of cleanup listed as complete.
  
- e. The Pole 24 location is approximately 0.5 miles east of the Napa County Airport, and is therefore subject to the requirements of the County's Airport Compatibility Combination zoning district and the requirements of the Napa County Airport Land Use Compatibility Plan (ALUCP). The project site is located within compatibility Zone D of the Napa County Airport, which is a Common Traffic Pattern zone with aircraft overflight between 1,000 feet above the ground to as low as 300 feet above ground level. Zone D areas are routinely overflown by aircraft operating to and from the airport with frequent single-event noise intrusion. Overflights in these areas can range from near the traffic pattern altitude (about. Accident risk varies from low to moderate. As such, persons on the project site will be exposed to noise from the regular aircraft overflight, however, the passive nature of the proposed project would not require on-site employees on a daily basis. No lighting is proposed as part of the monopole towers. County development regulations have been certified as meeting ALUC compatibility requirements, and consequently the project is not subject to separate ALUC review because it has been designed to comply with County airport compatibility land use requirements.
  
- f. The locations associated with the proposed project have been reviewed by the Napa County PBES Engineering and Public Works departments and found that the project meets Napa County Road and Street Standards. Therefore, the project would not obstruct emergency vehicle access. The project has been reviewed by the County Fire Department and Engineering Services Division and found acceptable, as conditioned
  
- g. The project would not increase exposure of people and/or structures to a significant loss, injury or death involving wild land fires. The project would comply with current California Department of Forestry and California Building Code requirements for fire safety. Impacts would be less than significant.

Mitigation Measures: None required.

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

Discussion:

On January 14, 2014, Governor Jerry Brown declared a drought emergency in the state of California. That declaration was followed up on April 1, 2015, when the Governor directed the State Water Resources Control Board to implement mandatory water reductions in cities and town across California to reduce water usage by 25 percent. These water restrictions do not apply to agricultural users. However, on April 7, 2017, Governor Jerry Brown signed an executive order lifting California's drought emergency in all but four counties (Fresno, Kings, Tulare and Tuolumne). The County of Napa had not adopted or implemented any additional mandatory water use restrictions. The County requires all discretionary permit applicants to complete necessary water analyses in order to document that sufficient water supplies are available for the proposed project and to implement water saving measures to prepare for periods of limited water supply and to conserve limited groundwater resources.

- a. The proposed project will not violate any known water quality standards or waste discharge requirements. The pole locations were purposefully located outside of State regulated waters therefore the applicant is not required to obtain a stormwater permit from the Regional Water Quality Control Board (RWQCB). The project proponent will implement the County's Best Management Practices, which comply with RWQCB requirements, the project does not have the potential to significantly impact water quality and discharge standards.
- b. The project does not propose to use any groundwater nor require water service for operation of the monopole and IQ Firewatch poles. For this reason, the proposed project would not use any groundwater resources or lower the local groundwater table. The project would minimally increase the amount of impervious area on the project site. Therefore, the project would have no significant impact on groundwater recharge.
- c (i-iv). The proposed project would not substantially alter the existing drainage patterns of the site or vicinity. As the proposed project is a

minor physical change to the surrounding terrain and would not result in an impact to substantially alter the drainage pattern on site or cause a significant increase in erosion or siltation on or off the project site. Napa County Engineering Division reviewed the project and indicated there is no impact.

- d. Pole 1 is in a 0.2% moderate to low risk flood area. Pole 22 is on the edge of a FEMA Flood Zone AE area. Poles 18 and 23 are located in a Flood Zone AE area and also within a Floodway. Poles 14, 19 is within an FEMA Flood Zone AE area. The pole locations lies outside the boundaries of the 100 and 500 year flood hazard boundaries. The parcel is not located in an area that is subject to inundation by tsunamis, seiches, or mudflows. The poles would extend vertically between 60 and 85 feet in the air. All equipment is weatherproof and/or sealed and has containment devices included, in the event of a natural disaster.
- e. The proposed project would not conflict with a water quality control plan or sustainable groundwater management plan. No impacts would occur.

Mitigation Measures: None required.

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

Discussion:

a/b. The proposed project would not occur within an established community, nor would it result in the division of an established community. The proposed project complies with the Napa County General Plan, the Napa County Zoning Ordinance, applicable County Code sections, the Napa Valley Business Park Specific Plan, and all other applicable regulations. There are no habitat conservation plans or natural community conservation plans applicable to the property. Therefore, the project results in no impact.

Mitigation Measures: None required.

XII.	MINERAL RESOURCES. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
	a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

a./b. Historically, the two most valuable mineral commodities in Napa County in economic terms have been mercury and mineral water. More recently, building stone and aggregate have become economically valuable. Mines and Mineral Deposits mapping included in the Napa County Baseline Data Report (Mines and Mineral Deposits, BDR Figure 2-2) indicates that there are no known mineral resources nor any locally important mineral resource recovery sites located on the project site. No impacts would occur.

Mitigation Measures: None required.

XIII.	NOISE. Would the project result in:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
	a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	c) For 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion:

a/b. As noted within the project description, the IQ Firewatch and telecom/broadband sites are located throughout the County. Telecom/broadband sites are generally located along County roadsides, and IQ Firewatch towers will occur generally in remote ridgeline/hilltop areas. These sites are not located within close proximity to sensitive noise receptors, such as residential uses. Once developed, the sites will not generate noise audible beyond the site.

The proposed project will result in a temporary increase in noise levels during the minimal grading that would occur to prepared building sites, and during installation of the monopoles and ground mounted equipment. Other temporary construction related noise would be associated with pole installation. Noise associated with the IQ FireWatch poles would consist of vehicle traffic during placement of the trailers on which the poles would be mounted. Construction activities will be limited to daylight hours using properly muffled vehicles. Noise generated during this time is not anticipated to be significant. The proposed project would not result in long-term significant permanent construction noise impacts or operational impacts. Furthermore, construction activities would generally occur during the period of 7am-7pm on weekdays, during normal hours of human activity. All construction activities will be conducted in compliance with the Napa County Noise Ordinance (N.C.C. Chapter 8.16).

**CONSTRUCTION NOISE**

*Construction noise shall be minimized to the greatest extent practical and feasible under State and local safety laws, consistent with construction noise levels permitted by the General Plan Community Character Element and the County Noise Ordinance. Construction equipment muffling and hours of operation shall be in compliance with the County Code. Equipment shall be shut down when not in use. Construction equipment shall normally be staged, loaded, and unloaded on the project site, if at all practicable. If project terrain or access road conditions require construction equipment to be staged, loaded, or unloaded off the project site (such as on a neighboring road or at the base of a hill), such activities shall only occur daily between the hours of 8 am to 5 pm.*

c. The Pole 24 site is located within compatibility Zone D of the Napa County Airport, which is an area of common aircraft overflight. As such, persons on the project site will be exposed to noise from regular aircraft overflight. The Napa County Zoning Code, section 8.16.070 Exterior noise limits, lists the maximum allowable level for Industrial areas as 75 dbA. Based on the County General Plan Community Character Element, figure CC-1: Napa County Airport Projected Noise Levels (dBA CNEL), the project site is located outside of the airport area projected to have levels of 55 dbA or less, which is less than the maximum allowed in the Industrial area. Therefore the location of the project within the airport land use area will have a less than significant impact on people working in the project area. The nature of the uses allowed in the Industrial Park (IP) zoning is not sensitive to increased noise levels from aircraft, and is considered compatible with aircraft operations.

Mitigation Measures None required.

XIV.	POPULATION AND HOUSING. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
	a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

a/b. The proposed project would be constructed by different contractors and is temporary in nature and does not involve new infrastructure. It would not substantially increase the number of jobs in the area and it is considered to be relatively small compared to the overall area and nearby communities. Therefore, this increase in jobs will not contribute to a cumulatively considerable increase in the demand for housing units within Napa County and the general vicinity and impact to population and housing would occur. There are no existing homes, on or adjacent to, the project site. The project would not result in the displacement of any housing units or people.

Mitigation Measures: None required.

XV.	PUBLIC SERVICES. Would the project result in:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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a) Substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

i)	Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii)	Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii)	Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv)	Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
v)	Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

- a. Public services are currently provided to the urban locations in Napa County and the additional demand placed on existing services as a result of the proposed project would be minimal. The Fire Department and Engineering Services Division have reviewed the application and recommend approval, as conditioned. The proposed project would have minimal impact on public parks as no residences are proposed. No impacts to public services occur.

Mitigation Measures: None required.

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

Discussion:

- a. The project would result in no increase in use of existing parks or recreational facilities based on the project's limited scope. Therefore, no impacts related to recreation would occur.
- b. No recreational facilities are proposed as part of the project. Therefore, no impact would occur.

Mitigation Measures: None required.

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

Discussion:

a/b/c.

The 34 sites are located throughout Napa County. Trips to each site will occur during project construction. The trips are temporary in nature, lasting only for the duration of construction, and will amount to approximately 10 to 20 daily trips to and from the site over the construction period which is anticipated to last for several weeks. This amount of trips will not result in a discernable change in traffic congestion occurring within the County or in the vicinity of projects sites. Minor localized delays to traffic may occur due to temporary lane closures to enable roadside construction activities. These temporary lane closures will not result in a significant traffic impact. The building contract will be required through the encroachment permit process to utilize flagpersons to ensure the safe flow of vehicles through lane closure areas.

Once completed, each site will generate minimal traffic trips, consistent of only one or two trips per month at most for site monitoring and maintenance. As such, the project will not result in a significant traffic impact.

d/e. The project would not alter any roadways or any geometric design features associated with them. Construction is temporary in nature and a traffic control plan would be developed by the contractor to ensure that roadways are not blocked and that adequate emergency access is maintained at all times.

f. The project would not add or remove parking spaces and would therefore have no impacts to parking demand.

Mitigation Measures: None required.

<b>XVIII. TRIBAL CULTURAL RESOURCES.</b> 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:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k); or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion:

**a-b)** As discussed in **Sections V (Cultural Resources)** and **Section VII (Geology and Soils)**, the numer project sites have been identified by tribal representatives from Yocha Dehe Wintun Nation and Middletown Rancheria of Pomo Indians of California as being within or close to areas considered sensitive for tribal resources. As such, mitigation measures for Cultural Resources have been included in Sections V and VII requiring continued tribal consultation prior to commencing construction on any site, and implementation of tribal monitoring and tribal protocols at the presiding tribes discretion. Sites fall within the ancestral homelands of three tribes, including Yocha Dehe, Middletown Rancheria, and Mishewal Wappo. Although Mishelwappo Wappo representatives did not elect to participate in AB-52 consultation prior to the issuance of this document, at the request of Yocha Dehe and Middletown Rancheria, outreach to Mishewal Wappo representative will be applied to those sites that fall within their ancestral homelands so as to coordinate tribal monitoring and protocol with Yocha Dehe Tribe and Middletown Rancheria.

Mitigation Measures:

See **Sections V (Cultural Resources)** and **Section VII (Geology and Soils)**,

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

Discussion:

- a. The project would not require the construction of a new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas but would add electric power and telecommunications facilities as a result of the Project. The project would not exceed wastewater treatment requirements of the Regional Water Quality Control Board and would not result in a significant impact on the environment relative to wastewater discharge. As conditioned, impacts would be less than significant.
- b. The project would only require temporary water use during construction and would therefore not influence water supplies during normal, dry and multiple dry years.
- c. The project does not have any components that would require increased demand on a wastewater treatment facility.
- d. The project would be served by Keller Canyon Landfill which has a capacity which exceeds current demand. As of January 2004, Keller Canyon Landfill had 64.8 million cubic yards of remaining capacity and has enough permitted capacity to receive solid waste through 2030. No impacts will occur.
- e. The project would not result in the generation of solid waste. Therefore no impacts related to solid waste would occur.

Mitigation Measures: None required.

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

Discussion:

a-d. The project is proposed to improve emergency services communication. Nearly all of Napa County is within moderate to high Fire Hazard Severity Zones in State Responsibility Areas. The project would not increase exposure of people and/or structures to a significant loss, injury or death involving wildland fires. There are no project features that would impair an adopted emergency response plan or evacuation plan. The project would comply with current California Department of Forestry and California Building Code requirements for fire safety. The project site currently is not served by overhead utilities for power and would continue to do so as a result of the proposed project. No new overhead power line infrastructure would be required for the proposed use modification. Therefore, potential for impacts from this project would be considered less than significant.

Mitigation Measures: None required.

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

**Discussion:**

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

**a/b)** As discussed in this Initial Study, implementation of the project, inclusive of environmental mitigation measures as noted in Section X, Biological Resources, would reduce potential impacts to biological resource to a less than significant level. Incorporation and implementation of the Environmental Commitments included in this project would minimize and avoid potential impacts to special-status plan species, bird species and bat species that may be present at sites. In addition, mitigation measures have been included to avoid unintentional incursions into wetlands. Cultural resources or examples of California history or prehistory have been identified within the project areas, and with incorporation of standard and project specific conditions for the protection of cultural and tribal cultural resources that may be discovered accidentally, as all as tribal protocol and monitoring mitigation measures reduce potential for significant impacts to a less-than-significant level (**Sections V, VII and XVIII, Cultural Resources and Tribal Cultural Resources**). Therefore, the proposed project, with incorporation of project Environmental Commitments, mitigation measures and conditions of approval, is not anticipated to result in potential significant direct, indirect, and cumulative impacts to the quality of the environment, wildlife species, or historic/cultural resources.

In addition to the impact categories identified above, the following discussion summarizes those impacts considered to be less than significant with development of the project: Aesthetics, Agriculture and Forestry Resources, Energy, Hazards and Hazardous Materials, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Transportation, Utilities and Service Systems, and Wildfire. Periodic use of lighting at the site would not create a substantial source of light and lighting. The potential contribution to aesthetic impacts associated with the project is considered to be less than cumulatively considerable. The project does not conflict with any current zoning for agricultural or forestry use, nor does the project conflict with the any applicable land use plan, policies, or regulation as mitigated and conditioned. There are no known mineral resource areas within the project site or immediate vicinity. The potential contribution to noise or vibration impacts is considered less than cumulatively considerable. Traffic related to construction would not increase by a discernible amount and the relatively low number of off-peak vehicle trips associated with the project are considered less than cumulative considerable. The project does not include the construction of structures that would result in population growth or displacement of people, the project would not adversely impact current or future public services, or require the need for utilities and service systems. For these reasons, impacts associated with the project that may be individually limited, but cumulatively considerable, would be less than significant.

Considering the project site's characteristics, surrounding environment, and the scope and scale of the proposed project, and with incorporation of identified mitigation measure and conditions of approval as discussed throughout this Initial Study, the proposed project is not anticipated to

result in either project-specific or cumulatively considerable negative impacts; therefore, impacts associated with this project that may be individually limited, but cumulatively considerable, would be less than significant.

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

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## FIGURES

- Figure 1: Project Site Location
- Figure 2: Project Site Vicinity
- Figure 3: Images of Structures
- Figure 4: Representative Site Photographs

## ATTACHMENTS

- Attachment A: WRECO, May 12, 2021, Biological Resources Study