

# NAPA COUNTY REGIONAL PARK AND OPEN SPACE DISTRICT

1195 3<sup>rd</sup> Street, Second Floor  
Napa, Calif. 94559  
[www.napaoutdoors.org](http://www.napaoutdoors.org)

## Notice of Intent to Adopt a Subsequent Mitigated Negative Declaration

September 26, 2024

1. **Project Title:** Suscol Headwaters Park
2. **Property Owner:** Napa County Regional Park and Open Space District
3. **Contact person, phone number and email:** Chris Cahill, General Manager, (707) 299-1335, [ccahill@ncrposd.org](mailto:ccahill@ncrposd.org)
4. **Project location and APN:** The proposed Subsequent Mitigated Negative Declaration covers +/- 709 acres owned by the Napa County Regional Park and Open Space District in Napa County (APNs 045-360-013, -014, -022, and 057-030-014) and in Solano County (APNs 0148010180 and 0148010190). It also includes +/- 2.2 miles of proposed natural surface trail located on easements across Napa County parcels 057-340-002, 057-020-055, and -056 and a +/- 0.75 acre trailhead parking area located on an easement on Napa County parcel 057-020-056. Napa County Zoning: Agricultural Watershed (AW) and Agricultural Watershed-Airport Compatibility (AW-AC). Solano County Zoning: Watershed (W-160).
5. **Project Sponsor's Name and Address:** Napa County Regional Park and Open Space District, 1195 Third Street, Second Floor, Napa, Calif. 94559 ([info@ncrposd.org](mailto:info@ncrposd.org))
6. **General Plan Description:** The project site is designated as Agricultural Watershed/Open Space in the Napa County General Plan and Watershed in the Solano County General Plan.
7. **Current Zoning:** The majority of the project site is designated as Agricultural Watershed in the Napa County Zoning Code. The western-most portions of the project site are designated Agricultural Watershed-Airport Compatibility. The +/- 20 acre Solano County portion of the property is zoned Watershed (W-160).
8. **Project Description:** Adoption of an amended Park Development Plan by the Napa County Regional Park and Open Space District to allow the Suscol Headwaters Park to be improved and operated as a publicly-accessible open space and park and recreational facility. Access would be via a new entrance, +/- 0.75 acre parking lot, and trailhead off North Kelly Road across from Camino Dorado as well as through the existing Napa Solano Ridge Trail connection to Skyline Wilderness Park. Proposed development primarily consists of natural-surface, multi-use, non-motorized trails. Phase 1 of the Suscol Headwaters Park Development Plan was adopted in January 2020, including opening the park to the public through Skyline Park and approval of a trail network north of the main Jameson Canyon ridgeline. This project would expand the Park Development Plan to include Phase 2 development south of the main Jameson Canyon ridgeline including a trail network and a trailhead parking lot located off North Kelly Road, along with making some minor changes to the adopted Phase 1 trail plan. No development is presently proposed in Solano County. The proposed Park Development Plan and additional supporting information are available online at <https://napaoutdoors.org/documents/suscol-headwaters-park-phase-2-park-development-plan/>.

### PRELIMINARY DETERMINATION:

The General Manager of the Napa County Regional Park and Open Space District has tentatively determined that the following project would not have a significant effect on the environment as mitigated and the District intends to adopt a **subsequent mitigated negative declaration**. Documentation supporting this determination is contained in the attached Initial Study Checklist and is available for inspection at <https://napaoutdoors.org/documents/suscol-headwaters-park-phase-2-park-development-plan/> or by appointment at the offices of the Napa County Regional Park and Open Space

District, 1125 Third St., Second Floor, Napa, CA 94559 between the hours of 9:00 AM and 5:00 PM Monday through Friday (excepting holidays).

26-SEP-2024

DATE:



BY: Chris Cahill, General Manager

**WRITTEN COMMENT PERIOD: Written comments may be submitted through October 30, 2024**

*Please send written comments to the attention of Chris Cahill, Napa County Regional Park and Open Space District, at 1195 Third St., Second Floor, Napa, Calif. 94559, or via e-mail to [ccahill@ncrposd.org](mailto:ccahill@ncrposd.org). The Board of Directors of the Napa County Regional Park and Open Space District will consider adoption of this Subsequent Mitigated Negative Declaration and of the revised Suscol Headwaters Park Development Plan at a public hearing subsequent to the close of the written comment period. Oral and written comments may also be submitted at the time of that hearing. You may confirm the date and time of the Napa County Regional Park and Open Space District hearing by calling (707) 299-1335.*

# NAPA COUNTY REGIONAL PARK AND OPEN SPACE DISTRICT

1195 3<sup>rd</sup> Street, Suite 210

Napa, Calif. 94559

707.253.4417

## Initial Study Checklist

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9. **Background (Subsequent Initial Study):** A previous Mitigated Negative Declaration (MND) for Phase 1 of the Suscol Headwaters Park Development Plan was adopted by the Board of Directors of the Napa County Regional Park and Open Space District on January 13, 2020 and was re-adopted by the Napa County Planning Commission on February 19, 2020 at which time Napa County granted the park a Napa County Use Permit as was then required. The previous MND found that the Phase 1 Suscol Headwaters Park Development Plan would have less

than significant impacts on the environment subject to a biological mitigation measure related to Streamside daisy. Suscol Headwaters Park opened to the public thereafter and roughly 65% of the trail development envisioned in the Phase 1 Park Development Plan is now complete. No Use Permit is required for Phase 2 of the proposed Park Development Plan as a result of the Save Lafayette Trees v. East Bay Regional Park District (2021) 66 Cal.App.5th 21 ruling. As noted above, this subsequent project would expand the Suscol Headwaters Park Development Plan to include Phase 2 development south of the main Jameson Canyon ridgeline including a trail network and a trailhead parking lot located off North Kelly Road, along with making some minor changes to the adopted Phase 1 trail plan.

10. **Environmental Setting and Surrounding Land Uses:** The proposed project encompasses the 709-acre Suscol Headwaters property owned by the Napa County Regional Park and Open Space District, approximately 2.2 miles of natural surface access trail to be located on easements crossing neighboring properties owned by Global Ag Properties II USA (Suscol Mountain Vineyards) and Napa Sanitation District (Napa San North Kelly Road Sprayfields), and a 0.75 acre trailhead parking lot located on an easement on land owned by Napa Sanitation District (Napa San North Kelly Road Sprayfields). Suscol Headwaters Park has been open to the public since 2020 and includes a mix of new natural surface trails and existing dirt ranch roads traversing the property north of the ridgeline that divides the watershed of Suscol Creek from those of Fagan and Sheehy Creeks. The Phase 2 development proposed here would occur on undeveloped Open Space District-owned land south of that ridgeline and on easements across neighboring properties developed to vineyards or used to grow irrigated forage with reclaimed water. The Open Space District's Suscol Headwaters Park property has historically been used for cattle grazing, which continues to take place on the property under a lease with the District. The property contains a variety of mostly non-native grasslands, mixed Oak Woodlands, and riparian vegetation.

The Project is approximately 2 miles east of State Highway 29 and one mile north of State Highway 12.

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

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

California Department of Fish and Wildlife (T)

**Other Agencies/Organizations Contacted:**

Napa County

Napa Sanitation District

Skyline Wilderness Park Citizen's Association

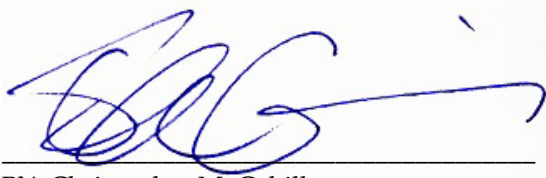
12. **California Native American tribal consultation:** Have tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.? No tribes have requested consultation.

**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, 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 visits to the site and surrounding areas. 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 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 only 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.



BY: Christopher M. Cahill  
General Manager  
Napa County Regional Park and Open Space District

26-Sep-2024

Date

## Detailed Project Description

# Suscol Headwaters Park Development Plan

The Suscol Headwaters Park Development Plan is detailed in the attached graphics. Generally, the Park Development Plan involves the Napa County Regional Park and Open Space District permanently preserving, improving, and providing public access to 709 acres of District-owned ridgeline open space spread across the Suscol Creek, Sheehy Creek, and Fagan Creek watersheds adjacent to Skyline Wilderness Park and due north of Jameson Canyon Road and east of North Kelly Road. Suscol Headwaters Park would also include trail and parking improvements on easements on or across adjoining properties owned in fee by the Napa Sanitation District, Suscol Mountain Vineyards, and the Tuteur family. Public access to the park would be via a new entrance, +/- 0.75 acre parking lot, and trailhead off North Kelly Road across from Camino Dorado as well as through the existing Napa Solano Ridge Trail connection to Skyline Wilderness Park. Alternate administrative, public safety, and other by-invitation easement access (but no public park access) is available from Anderson Road to the west over existing improved vineyard roads. Proposed recreational development primarily consists of +/- 18 miles of natural-surface, non-motorized, multi-use trails. Proposed uses, facilities, and other notable features of the project are further summarized below:

### Proposed Uses

- **Hiking.** Allowed except when the park is closed due to high fire hazard, excessively wet trails, or other hazards (see discussion in “Other Notable Features” section regarding park closure policy).
- **Horseback riding.** Generally allowed on named trails, except when park is closed due to high fire hazard, excessively wet trails, or other hazards (see discussion in “Other Notable Features” section regarding park closure policy).
- **Mountain biking.** Generally allowed on named trails, except when park is closed due to high fire hazard, excessively wet trails, or other hazards (see discussion in “Other Notable Features” section regarding park closure policy).
- **Nature observation and study.** Allowed year-round, except when necessary to restrict use due to high fire hazard, excessively wet trails, or other hazards (see discussion in “Other Notable Features” section regarding park closure policy).
- **Other low-impact outdoor recreation and education.** Open space-based activities that do not disturb the natural character of the area, such as non-invasive geocaching or picnicking, but not including public hunting (hunting and trapping for management purposes by the District and its agents would be allowed), target shooting, or barbecuing, may be allowed.
- **No Motorized Recreation.** Except for Class 1 e-bikes and as required by state and federal disability access laws and regulations, no motorized recreation will be permitted, and outside of the trailhead parking area the public will not be permitted to drive any form of motorized vehicle within the preserve.
- **Hours of Operation.** The park will generally be open sunrise to sunset.

### Proposed Facilities

All of the following are as more precisely depicted in the attached Park Development Plan.

- **Trails.** Approximately 18 miles of multi-use trail, of which +/- 17 miles would be singletrack and +/- 1 mile would be repurposed existing ranch road. As of July, 2024 +/- 5 miles of trail exist, +/- 3 miles of trail are approved to be built north of the Jameson Canyon ridgeline, and +/- 9 miles of new singletrack are proposed on both sides of the Jameson Canyon ridgeline in the attached Park Development Plan.

- **North Kelly Road Trailhead.** A gated +/- 0.75 acre trailhead and parking lot located off North Kelly Road across from Camino Dorado. The trailhead area would include an ADA-accessible picnic area, a trailhead kiosk, a multi-use vehicle turnaround and gathering area, and an ADA-accessible portable restroom. The parking lot would accommodate +/- 24 motor vehicles (2 ADA spaces) plus an additional +/- 4 horse trailer spaces as shown in the attached Park Development Plan Detail.
- **Signage.** A kiosk and map will be installed at the park entrances off North Kelly Road and from Skyline Wilderness Park, welcoming visitors to Suscol Headwaters and advising them of rules and regulations. Directional signage will be included at trailheads and junctions and trail difficulty will be indicated using the standard Green (beginner), Blue (intermediate), Black (advanced) scheme. Signs will also be installed as necessary along property lines advising users of park boundaries.

### Other Notable Features

- **Low Impact.** Every aspect of construction and operation of the park will be designed to be low impact in terms of resource and energy consumption and generation of pollutants. There will be no motorized recreation within the park.
- **California red-legged frog.** The District has constructed a red-legged frog pond within the existing Phase 1 area of Suscol Headwaters Park and will be improving the surrounding habitat as part of an existing agreement with Caltrans and the US Fish and Wildlife Service.
- **Wildfire hazard.** Park activities will be limited as appropriate, up to and including full park closure, as needed during periods of extreme wildfire hazard as determined by the County Fire Marshall or additionally whenever in the District's judgment the combination of forecasted temperature, humidity, and wind suggest extreme wildfire hazard. No open fires will be allowed.
- **Wet weather.** Trails will be closed as needed when soils are saturated to prevent erosion and damage to trails. Appropriate closure protocols for hikers, mountain bikers, and equestrians will be adopted and enforced. The performance standard used to guide the closure protocols will be that there is no trail-related sediment flow either directly or indirectly into local creeks.
- **Other Hazards.** Trails will be partially or fully closed, and the park may be completely closed to the public as needed to avoid conflict with District property maintenance activities, or as needed to avoid any other public safety hazard or to protect water quality or other natural resources.
- **Hunting and shooting.** No sport hunting or target shooting will be allowed.
- **Grazing.** Existing grazing may continue. The duration and intensity of grazing will be guided by the existing Suscol Mountain grazing management plan, adopted as a component of the Suscol Mountain Vineyards ECP. A key grazing objective will be to use grazing to control the risk of wildfire and the spread of invasive weeds.
- **Fencing.** The property is largely fenced along its perimeter and internal fencing was reviewed and approved as a component of the Suscol Mountain Vineyards Agricultural Erosion Control Plan (ECP, P09-00176). Any additional fencing will be the minimum necessary to provide for public safety and limit trespass onto neighboring agricultural properties or for resource protection.

### Environmental Commitments and Best Management Practices

The project hereby incorporates the following features to enhance environmental protections during construction and operation:

#### **Air Quality Best Management Practices, during construction:**

- During dry season trailhead parking lot construction, all exposed surfaces (graded areas, staging areas, and stockpiles) will be covered or watered twice per day as needed to maintain sufficient soil moisture to control fugitive dust.
- Any trucks hauling soil, sand, and other loose materials will be covered in accordance with Section 23114 of the California Vehicle Code during transit to and from the site.
- Adjacent public roads will be swept daily with wet power vacuum street sweepers, if visible soil material is carried/tracked out onto roadways.
- Grading and earthmoving activities will be suspended when winds exceed 25 mph.

**Biological Resources Protections:**

- Excepting natural surface trails as shown in the Park Development Plan, the entire +/- 300 acre portion of the Suscol Headwaters Park property owned in fee by the District and located in the watersheds of Sheehy Creek or Fagan Creek will be kept in a natural, open, undeveloped condition to provide forage, habitat, and refugia for Swainson's hawk, California red-legged frog, and other native species.
- Tree removal or trimming for the North Kelly Road Trailhead construction project will be the minimum necessary and will only occur outside the typical breeding season for raptors (September 16 to December 31) if raptors are determined to be present.
- No construction or soil disturbance will take place within the banks of any blue line stream.
- Excavated materials along the entirety of the trail routes will be distributed in a manner that does not create piles or berms of uncompacted disturbed soil that would encourage colonization by invasive plants.
- No sport hunting will be allowed. Hunting or trapping on the property will be limited to wildlife management activities by the District, its agents, and/or wildlife agencies having jurisdiction over the relevant resource.
- The presence of bears and mountain lions will be regarded as natural and desirable, and depredation permits for problem animals will only be sought as a last resort, and only if there is a clearly demonstrated and immediate need to protect public safety and where other methods of risk minimization, avoidance, and public education cannot be relied upon.
- No tree removal for trail construction purposes shall occur in recorded Oak Woodland Conservation Areas.

**Cultural Resources Protections:**

- Should any archaeological, cultural, or paleontological artifacts be found during any soil disturbing construction activities, construction will cease until the District has had the location inspected by a qualified professional and has taken appropriate steps as recommended by the qualified professional to protect the resource.
- If human remains are encountered the Napa County Coroner will be informed to determine if an investigation of the cause of death is required and/or if the remains are of Native American origin. Pursuant to Public Resources Code Section 5097.98, if such remains are of Native American origin the nearest tribal relatives as determined by the State Native American Heritage Commission will be contacted to obtain recommendations for treating or removal of such remains, including grave goods, with appropriate dignity.

**Safety Features:**

- Public motor vehicle use will be prohibited, except as required by the Americans with Disabilities Act and related federal and state regulations.
- Power tools will only be used by properly trained and equipped staff and volunteers.
- Smoking is prohibited at all Napa Open Space District parks.



- The park will be closed to public use during periods of extreme wildfire hazard, as determined by the County Fire Marshall, as well as when in the District's judgment the combination of temperature, humidity and wind create a potentially unsafe situation.
- The public will not be permitted to have open fires.

**Water Quality Protections:**

- New trail construction will follow the standards and best management practices adopted by the District in its Moore Creek Trail Construction Standards, as amended.
- No grading may take place within the banks of any blue line streams.
- Where trails cross seasonal drainages, the drainages will be kept clear of loose dirt created by trail grading activities, and then armored with native rock as needed to prevent soil from washing downhill during periods of significant rainfall and eventually getting into nearby creeks.
- Trails will be closed as needed when soils are saturated to prevent erosion and damage to trails. Appropriate closure protocols for hikers, mountain bikers, and equestrians will be adopted and enforced. The performance standard used to guide the closure protocols will be that there is no trail-related sediment flow either directly or indirectly into local creeks.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>I. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:</b>				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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:**

a.-d. Due to the topography of the non-urbanized Suscol Headwaters area, singletrack trails, which have an average width of 4 feet and are surfaced with natural materials are unlikely to be visible from surrounding public roads; they are effectively no more visible than the game and cattle trails that already proliferate on this and neighboring properties. Physical changes to the property would otherwise be limited to the construction of a less than one acre trailhead parking area adjacent to North Kelly Road in an area proximate to significant existing light industrial development. No new lighting is proposed and the area is not located within a state scenic highway.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>II. AGRICULTURE AND FOREST RESOURCES.</b>				
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:**

a.-e. None of the subject property is classified as farmland of Prime, Unique, or Statewide importance. The property is designated Agricultural Watershed/Open Space by the Napa County General Plan. The property has historically been grazed, and grazing will continue into the future under the long-term grazing lease in place with Five Dot Cattle Company. The Napa County General Plan indicates that public recreation is permitted in areas designated Agricultural Watershed/Open Space, and that public recreation and agriculture can be compatible uses. The riparian corridors on the property qualify as forest land as defined by the Public Resources Code; however, there is no conflict or impact because forest land is defined in the code section as being compatible with recreation, water quality, and other public benefits. The proposed revised Park Development Plan would thus not cause any change in the forest land status of the property. The project site is not zoned as a Timberland Production Zone.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:</b>				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Discussion:**

a-b A small amount of dust (PM 10 and PM 2.5) may be generated during trail and trailhead construction. The May, 2017 update to the Bay Area Air Quality Management District CEQA Guidelines (page 2-2) (BAAQMD Guidelines) indicates that the Threshold of Significance for fugitive dust for construction activities will not be exceeded if Best Management Practices are adopted. These practices are included in the environmental protections included in project design.

The amount of dust generated by trail users post-construction is expected to be too minor, infrequent, and localized to be significant based on the standards and examples provided in the BAAQMD Guidelines.

Reactive Organic Gases (ROG) and Oxides of Nitrogen (NOx) will be generated by both construction activities and by users driving to and from the park. The BAAQMD Guidelines indicate that the level of significance for ROG and for NOx is 54 lbs/day for both construction activities and ongoing operations. The BAAQMD Guidelines do not contain a specific threshold for the type of open space park proposed in this project, but Table 3-1 (2017 update to the Bay Area Air Quality Management District CEQA Guidelines, page 3-2) makes it clear that the proposed project will generate far less than these levels. According to said Table, the screening threshold for a city park is 2,613 acres for operations, and 67 acres for construction. In a city park, virtually every acre is constructed landscape, hardscape, or buildings, and is used intensively by the public. By comparison, the area of disturbance for trail construction for this project will be between 6 and 12 acres. The area of disturbance for the North Kelly Road Trailhead will be no more than 1 acre. Nearly all of the remaining open space acres within the project will seldom if ever be used by the public. As such, the project does not begin to approach the screening thresholds that would require further analysis and impacts are less than significant with implementation of the BMPs included in the project description.

c. According to the BAAQMD Guidelines, sensitive receptors within 1,000 feet of a proposed activity need to be considered relative to air pollutants for which the region is in non-attainment. The region is a non-attainment basin for particulates. Fewer than 10 sensitive receptors—all private residences—exist within 1,000 feet of the project area. As noted above, construction Best Management Practices will be utilized to control fugitive dust, and according to the BAAQMD Guidelines these will keep fugitive dust below the BAAQMD-prescribed level of significance. No public vehicular traffic be allowed within the park beyond the trailhead parking lot, which is directly adjacent to North Kelly Road. The limited number of sensitive receptors located within 1,000 feet of the project area will not be exposed to a significant level of particulates and impacts are less than significant.

d. The project is not expected to generate any new odors. There are no impacts.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>IV. BIOLOGICAL RESOURCES. Would the project:</b>				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, Coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 checked="" type="checkbox"/>	<input 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.-d. Botanical surveys were conducted on six days in 2019 at the appropriate times of year (Jake Ruygt, *Suscol Headwaters Botanical Resource Study*, September 2019) with an update completed in 2022 and 2023 (Jake Ruygt, *Suscol Headwaters Botanical Resource Study – Phase 2*, March 2023) covering the Phase 2 portion of the property, in addition to biological surveys completed in 2007 and 2009 for a previously proposed project on the property. The surveys identified one special-status species onsite: Streamside daisy (*Erigeron bioletti*), a perennial herb endemic to California. This species has no state or federal listing status, but has a California Rare Plant Rank of 3, as listed by the California Native Plant Society. Rank 3 plants are those for which the necessary information to assign them to one of the other ranks is lacking. Not enough about these plants is known to determine their threat level.

The 2023 botanical survey additionally identified the possibility of Narrow-anthered Brodiaea (*Brodiaea leptandra*), which is a CNPS List 1B.2 species, in the vicinity of the Fagan Creek riparian corridor. Narrow-anthered Brodiaea occurs in wooded and brushy places on volcanic substrates. It has been recorded in Skyline Park about 1.5 miles north of the study area. According to the 2023 botanical survey, suitable habitat is restricted at Suscol Headwaters to areas of volcanic rock outcroppings where there is seasonal surface (sheet) drainage. This species blooms from late May into July. The 2023 surveys were not conducted during the flowering season of this species. The probability of occurrence is seen as low in woodland/grassland transitions, however, an in-

season survey is recommended prior to any construction of trails along the Fagan Creek riparian corridor. A mitigation measure is incorporated to that end.

Eight streamside daisy locations were recorded during 2019 surveys. In some areas, trails are proposed in the vicinity of some streamside daisy individuals. As such, there is the potential for significant impacts. A mitigation measure was adopted as a component of the original Phase 1 mitigated negative declaration for this project requiring a pre-construction survey and precise mapping of streamside daisy populations prior to trail construction in the vicinity. That survey was completed in 2023, streamside daisies were flagged on site, and buffers established through which no trail construction activity is to occur.

Based on the surveys referenced above and our review of Napa County's natural resources databases including the California Natural Diversity Database (CNDDDB) and the County's Sensitive Biotic Communities Database, there are a variety of other listed species that have the potential to inhabit the project area. However, no significant impacts to threatened, endangered, or sensitive species or habitats are expected, as discussed below:

- Nature based, non-motorized recreation as proposed will be low-intensity, with most of the property undisturbed and unlikely to experience much public use. Park users will be distributed over 25 miles of trail within Skyline Park and 18 miles of trails within Suscol, for a probable peak weekend density of less than 10 people per trail mile per day, on average.
- The only notable potential disturbance to plants will occur due to trail construction. As described in the below mitigation measure, the known special status plants will be flagged and avoided.
- No construction or soil disturbance will take place within any wetland/blue line creek.
- The most sensitive habitat within the project area is the riparian habitat along the creeks. The project's proposed trails will utilize existing crossings using ranch roads and will therefore not result in any additional impacts to the creeks. Although Suscol Creek is designated critical habitat for steelhead (*Oncorhynchus mykiss*), a federally endangered species, the fact that no work will occur within the streams and that the project includes measures in the project design that minimize erosion and runoff during construction and operation, will result in no impacts to this species.
- The property is largely fenced along its perimeter and internal fencing was reviewed and approved as a component of the Suscol Mountain Vineyards ECP. Any additional fencing will be the minimum necessary to provide for public safety and limit trespass onto neighboring agricultural properties. Neither trail construction nor operation will have any effect on wildlife movement. Wildlife will continue to be free to move through the area.
- Although the project property overlaps with red-legged frog critical habitat, development in the critical habitat zone would be limited to less than two miles (out of a total 18 miles proposed in the Park) of remote natural surface singletrack trail. Excepting natural surface trails as noted in the Project's **Environmental Commitments**, the entire +/- 300 acre portion of the Suscol Headwaters Park property owned in fee by the District and located in the watersheds of Sheehy Creek or Fagan Creek will be kept in a natural, open, undeveloped condition to provide forage, habitat, and refugia for California red-legged frog and other native species. Additionally, the District is actively developing a California red-legged frog pond and will be managing the area surrounding the pond as priority red-legged frog habitat on the Suscol Headwaters property, just north of the main Jameson Canyon ridgeline.

- Western pond turtle has been identified near the property according to the CNDDDB. However, that known western pond turtle occurrence is nearly a mile from the closest proposed trails. No ponds or other suitable habitat are located on the Suscol Headwaters park property south of the Jameson Canyon ridgeline. North of the Jameson Canyon ridgeline we are improving habitat for Western pond turtles by developing a new red-legged frog breeding pond. While the species can overwinter up to 1,500 feet from aquatic habitat and may migrate overland up to ½ mile, lack of habitat between the know occurrence and proposed trails would preclude turtles migrating into the Phase 2 project area.
- There are several Oak Woodland Conservation Areas throughout the property, areas where development is constrained by a deed restriction resulting from the Suscol Mountain Vineyards ECP. Natural surface single track trails operated by public agencies are in keeping with the requirements of the deed restriction and will not have any impact on the Oak Woodland Conservation Areas. No tree removal is allowed in these areas and non is proposed in this project.

**Mitigation Measure Biological Resources 1:** Prior to the start of construction, a qualified biologist will flag the existing eight streamside daisy plants plus a 10-foot buffer surrounding the plants, such that all trail construction will avoid the plants.

**Mitigation Measure Biological Resources 2:** Prior to the start of any trail construction in or near the wooded riparian zone of Fagan Creek, a qualified biologist will conduct a focused in-season (May to July) survey to identify and flag any Narrow-anthered Brodiaea there-existing. Construction near any discovered plants shall maintain a 10-foot buffer, such that all trail construction will avoid the plants.

Impacts after implementation of the mitigation measures will be less than significant.

- e. The project would not conflict with any local policy or ordinance protecting biological resources or any tree preservation policy or ordinance.
- f. The project will not conflict with the provisions of any adopted Habitat Conservation Plan, Natural Community Conservation Plan or other approved local, regional or state habitat conservation plan.

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
V.	<b>CULTURAL RESOURCES. Would the project:</b>				
	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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Discussion:**

a.-c. A Cultural Resources Study was prepared for a previous project on this property in 2009. It concluded that there are no known historical, archaeological, cultural or paleontological resources within the areas that would be affected by the project. The project then under review, the Suscol Mountain Vineyards development project envisioned the sort of extensive deep ripping and trenching that necessarily comes with vineyard development in the Napa Valley. Ground disturbance on the Suscol Headwaters Park property as a result of this project is comparably so minimal as to be barely discernible in comparison. Improvements proposed here would be limited to a network of new single-track trails, a gravel parking lot, a few gates, and some signage. No deep ripping, trenching, or extensive excavation of the type required for foundations, footings, or similar features is foreseeable. Should any artifacts be found during construction, construction will cease until the District has been able to have the location inspected by a qualified professional and appropriate steps taken to protect the resource, as described in the environmental protections section of the project description.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>VI. ENERGY. Would the project:</b>				
a) Result in a 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. Project construction includes a network of natural surface primarily singletrack trails and a small gravel trailhead parking lot. No buildings are proposed as part of this project. During construction of the proposed project, the use of construction equipment, truck trips for hauling materials, and construction workers' commutes to and from the project site would consume fuel. Construction activities and corresponding fuel energy consumption would be temporary and localized. In addition, there are no unusual project characteristics that would cause the use of construction equipment or haul vehicles that would be less energy efficient when compared with other similar construction sites within Napa County. Once construction is complete, equipment and energy use would only be necessary for the maintenance of the park improvements which would not include any unusual maintenance activities that would cause a significant difference in energy efficiency compared to surrounding land uses. Thus, the proposed project would not result in wasteful, inefficient, or unnecessary energy use. This impact would be less than significant.
- b. During construction of the park and trails, construction vehicles and equipment will need to comply with State requirements designed to minimize idling and associated emissions, which also minimizes use of fuel. Specifically, idling of commercial vehicles and off-road equipment would be limited to five minutes in accordance with the Commercial Motor Vehicle Idling Regulation and the Off-Road Regulation. The proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency or impede progress towards achieving goals and targets, and impacts would be less than significant.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>VII. GEOLOGY and SOILS. Would the project:</b>				



	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 checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1997), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Discussion:**

a. Napa County geological hazard databases indicate one potential earthquake fault running north-south through the project area. This fault bisects the southern portion of the Park property; no structural improvements are planned there and none are foreseeable given the project commitment to leaving the area south of the Jameson Canyon ridge open and otherwise undeveloped. The County database also identifies a number of landslide deposits within the project area.

The proposed new trails avoid areas that show evidence of having active landslide problems, though they do often traverse steep slopes. The soils in the area (Hambright rock outcrop) are gravelly with moderately high permeability. The Suscol Headwaters Park has many areas of mature tree growth where tree roots provide considerable soil stability. For these reasons, as long as water is properly controlled as discussed at "b." and "c." below, landslides and soil erosion are not expected to be a significant problem.

b. Trails will be constructed using modern trail design standards, specifically the standards and best management practices adopted by the District in its Moore Creek Trail Construction Standards, as amended. These design standards include generally keeping trail slopes less than 9 percent, outsloping the trail tread and installing

reverse grades as needed to prevent changes in natural water flows and concentration of water along the trail rather than across it, and by using native rock to stabilize the soil when needed where trails cross seasonal gullies.

- c. As noted in "a" above, certain sections of proposed new natural surface singletrack trail would cross areas that have in the past or may in the future be subject to landslides. This is not expected to be a significant adverse impact, however, due to the following:
  - o New trails will have a four foot wide or narrower tread, which is much narrower than the typical 10 or more feet in width of dirt roads, so the amount of cutting into the hillside is considerably less than would be the case for the typical road.
  - o Trails will be closed during periods of heavy rains when soils are saturated, which is when a landslide is most likely to occur.
  - o A failure of a trail would not have any serious consequence other than the need to temporarily close the trail until repairs could be made.
- d. None of the project area contains highly expansive soils. Furthermore, no structures are proposed as part of this project and expansive soils pose little risk to trails. Therefore, there would be no impacts associated with expansive soils.
- e. No septic tanks or alternative wastewater disposal systems are needed or proposed as a component of this project. Therefore, there would be no impact with regard to soils supporting septic tanks or alternative wastewater disposal systems.
- f. A Cultural Resources Study was prepared for a previous project on this property in 2009. It concluded that there are no known paleontological resources within the areas that would be affected by the project. The project then under review, the Suscol Mountain Vineyards development project envisioned the sort of extensive deep ripping and trenching that necessarily comes with vineyard development on the Napa Valley. Ground disturbance on the Suscol Headwaters Park property as a result of this project is comparably so minimal as to be barely discernible in comparison. Improvements proposed here would be limited to a network of new single-track trails, a gravel parking lot, a few gates, and some signage. No deep ripping, trenching, or extensive excavation of the type required for foundations, footings, or similar features is foreseeable. Should any artifacts be found during construction, construction will cease until the District has been able to have the location inspected by a qualified professional and appropriate steps taken to protect the resource, as described in the environmental protections section of the project description. Impacts on paleontological resources will be less than significant.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>VIII. GREENHOUSE GAS EMISSIONS. Would the project:</b>				
a) <b>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?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) <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?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Discussion:**

a-b. Greenhouse gasses will be generated by construction activities and by users driving to and using the park. The BAAQMD Guidelines provide a screening threshold of 1,100 metric tons of carbon dioxide-equivalents per year, which is roughly equivalent to a 60-unit residential subdivision. Standard trip generation models used by traffic engineers project that a 60-unit residential subdivision will generate more than 600 vehicle trips per day. Assuming a likely maximum of no more than 120 additional park visitors on peak weekend days (which would be roughly 40 percent of current visitation at adjacent Skyline Wilderness Park), greenhouse gas emissions would still be only 40 percent of the Air District-prescribed threshold on a peak weekend day. Over the course of a year average trip generation would be far lower than that. The project does not conflict with any county-adopted or another applicable plan, policy, or regulation adopted for the purpose of reducing the emission of greenhouse gases.

Although greenhouse gas emissions from the project will be far below significance levels, the project nonetheless has built into it several features designed to help reduce greenhouse gas emissions. First, non-motorized recreation relatively close to where Napa residents live and work is facilitated, which reduces the need to drive greater distances, usually outside of Napa County, to enjoy this form of recreation. Second, internal combustion motorized recreation of any kind is prohibited, except as is necessary to comply with the ADA.

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>IX.</b>	<b>HAZARDS AND HAZARDOUS MATERIALS. Would the project:</b>				
	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 type="checkbox"/>	<input checked="" 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"/>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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 checked="" type="checkbox"/>	<input type="checkbox"/>

**Discussion:**

- a.-b. No hazardous materials are expected to be used, with the possible exception of minor amount of gasoline and oil for running equipment, or herbicides for controlling invasive plants. Because of the small amounts that may occasionally be used, no significant impact is expected.
- c. There is no school within or near the project area. The closest school is over 2.5 miles from the project area.
- d. No part of the project is on any list of hazardous materials sites. The project area has historically been used for cattle grazing, which would not produce any historical hazardous materials such as buried tanks.
- e. The closest public airport to the project site is Napa County Airport, approximately 3 miles west. The western-most portion of the project area is within an airport compatibility zone identified in the Airport Compatibility Plan (Napa County Airport Land Use Compatibility Plan, and Napa County GIS zoning layer). This portion of the project site is located in Zones D “Common Traffic Area” and E “Other Airport Environs”, which prohibit noise-sensitive outdoor uses and indicate that most “nonresidential uses are generally acceptable”. Noise-sensitive resources usually include residential and school land uses. Outdoor recreation, including multiuse trails and trailhead parking lots, is an allowed use within Zones D and E, and will not result in any safety hazard. Therefore, the project will result in less than significant impacts.
- f. The project will not affect the implementation of or interfere with any emergency response plan.
- g. According to CalFire, the project is located in an area which is subject to moderate risk of wildland fires (on a scale of low, moderate, high, and very high). The project area was burned in a back-fire lit in the fight against the 2017 Atlas Peak fire. The project is not expected to create a significant increased risk of wildland fire for the following reasons:
  - The general public will not be allowed to drive cars, trucks, motor cycles, ATV’s, or other motorized recreational equipment on the property except within the gravel parking lot.
  - Only trained staff or volunteers will use motorized maintenance equipment, and its use will be limited to low-fire hazard periods.
  - The public will not be permitted to smoke while in the park.
  - Park activities will be limited as appropriate, up to and including full park closure, during periods of extreme wildfire hazard, as determined by the County Fire Marshall and additionally whenever in the District’s judgment the combination of forecasted temperature, humidity, and wind suggest extreme wildfire hazard.
  - No open fires will be allowed anywhere within the preserve.

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

**Discussion:**

- a. The proposed trailhead and trailhead parking lot construction adjacent to North Kelly Road would disturb greater than 1 acre of land and would be required to obtain coverage under the Construction General Permit (State Water Board Order 2009-0009-DW). Onsite construction activities subject to the Construction General Permit include clearing, grading, excavation, and soil stockpiling. The Construction General Permit also requires the development of a SWPPP by a certified Qualified SWPPP Developer. A SWPPP is required to identify all potential pollutants and their sources, including erosion and exposure of construction materials to runoff, and must include a list of BMPs to reduce the discharge of construction-related stormwater pollutants. A SWPPP must include a detailed description of controls to reduce pollutants and outline maintenance and inspection procedures. Typical sediment and erosion BMPs include protecting storm drain inlets, and establishing and maintaining construction exits and perimeter controls to avoid tracking sediment off-site onto adjacent roadways. A SWPPP also defines proper building material staging and storage areas, paint and concrete washout areas, describes proper equipment/vehicle fueling and maintenance practices, measures to control equipment/vehicle washing and allowable nonstormwater discharges, and includes a spill prevention and response plan.

In addition, the District's Moore Creek Trail Construction Standards contain up-to-date standards for designing and maintaining trails; proposed trails will be constructed and operated consistent with those guidelines, thereby reducing erosion potential and sedimentation.

Required compliance with existing regulations and policies regarding stormwater and construction activities would ensure that the proposed project would result in less-than significant impacts to water quality.

- b. The proposed project would not utilize groundwater resources. The proposed project would create a small amount of new impervious surface with construction of two concrete paved disabled parking spaces and installation of a portable ADA toilet. Because the amount of new impervious surfaces is very limited and the runoff from the new impervious surfaces would be directed to surrounding pervious surfaces, the proposed project's impacts on groundwater recharge would be less than significant and no mitigation measures are required..
- c. The proposed project would include minor grading activities including natural surface singletrack trail construction and construction of a new staging area that would slightly alter drainage patterns. Compliance with the Construction General Permit and regular trail maintenance to prevent erosion would ensure that changes to drainage patterns would result in less-than-significant impacts related to erosion and siltation. As discussed above, the proposed project would create a very limited amount of new impervious surfaces, and the runoff from the new impervious surfaces would be directed to surrounding pervious surfaces, therefore the proposed project would result in a less-than-significant impact related to runoff.

The proposed project would add vehicle parking at the proposed North Kelly Road trailhead parking area. Pollutants associated with vehicles (e.g., fuel, oil/lubricants, brake dust, and fallout from exhaust) can be deposited on the surface of parking lots which can contribute to the pollutant load in runoff. Because the proposed parking area would be gravel and surrounded by vegetated areas and drainage swales, pollutants would not be readily carried by runoff into receiving waters. Pollutants would be largely retained within the gravel surface and underlying soil (it would be, essentially, a self-treating area), and runoff from the parking lot would infiltrate and be filtered by surrounding vegetated areas and drainage swales prior to entering nearby drainages. No additional potential impacts on water quality are expected to result from the proposed project, beyond those discussed above. Therefore, the proposed project would result in a less-than-significant impact related to creating a substantial additional source of polluted runoff or otherwise degrading water quality.

- d. No construction is proposed within any mapped floodplain. There is no reservoir upstream of the project site, so there is no risk of dam failure affecting the project. The park will be closed during major storm events, so there is no risk of injury to people or significant harm to property. The project location is such that it is not subject to any reasonably conceivable seiche or tsunami.
- e. The proposed project would not conflict with a water quality control plan or sustainable groundwater management plan. No impacts would occur.

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>XI.</b>	<b>LAND USE AND PLANNING. Would the project:</b>				
	<b>a) Physically divide an established community?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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. The project will not divide any established community.
- b. The project does not conflict with any applicable land use plan, policy or regulation of any agency with jurisdiction over the project. The project is consistent with and helps implement many policies in the Napa County General Plan that call for expanded nature-based public recreational opportunities. No development is proposed in the small Solano County portion of the property.

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

**Discussion:**

- a.-b. The closest mineral resource is the Vulcan Industries aggregate quarry, which is located adjacent to Skyline Wilderness Park, approximately one mile from Suscol Headwaters Park. The proposed project would not interfere with this resource. No other resources are known in the vicinity, resulting in no impact.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>XIII. NOISE. Would the project result in:</b>				
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 ground-borne vibration or ground-borne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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. Currently the only noises present at the site are natural sounds made by animals and flowing water, and occasional distant engine noises (from Highways 12 and Highway 29, and from aircraft overhead) and the adjacent vineyard operation. Park users will therefore not be exposed to excessive amounts of noise. Regular park use will result in a minor increase in ambient noise levels due to human voices. However, any such noise will be well within the limits of what the Napa County Exterior Noise Ordinance considers reasonable. Noise, including any ground-borne noise or vibration, generated during the construction phase while be transitory and is not anticipated to be significant even for its limited duration. The proposed project would not result in long-term significant permanent construction noise impacts or operational impacts.
- c. The western-most portion of the project area is within an airport compatibility zone identified in the Napa County Airport Compatibility Plan (Napa County Airport Land Use Compatibility Plan, and Napa County GIS zoning layer). This portion of the project site is located in Zones D and E, which prohibit noise-sensitive outdoor uses and certain residential uses. Outdoor recreation, including multiuse trails, is an allowed use within Zones D and E, and would not be unduly impacted by aircraft noise. No one will be residing within the park, and any work done in this portion of the park will be intermittent and short in duration. Impacts related to aircraft noise will be less than significant.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>XIV. POPULATION and HOUSING. Would the project:</b>				
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. This project will not induce substantial unplanned housing growth, build new housing, establish new businesses, or induce substantial population growth in or near the project site. It will not change the projections and cumulative impacts related to population and housing balance that were identified in the Napa County 2008 General Plan EIR.
- b. The proposed project will not displace any existing people or result in the loss of any existing housing units and will not necessitate the construction of replacement housing elsewhere.



	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>XV. PUBLIC SERVICES. Would the project result in:</b>				
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 checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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. Based on the experience with Skyline Wilderness Park, which is a longstanding adjacent park used by hikers, mountain bikers, and equestrians, and thus comparable to the proposed project, the project will result in occasional new emergency calls for ambulance, police, or fire services. However, recreation users of wilderness areas are informed of and accept a certain amount of risk, and do not expect and are not provided with the level of public services and response times that are considered standard within urban areas. No new ambulance, fire, or police facilities, staffing, or equipment will be required as a result of the project. Most of the trails proposed by the project are accessible by ATV's. If needed, emergency service helicopters can land at several locations within the project area. Excellent cell phone coverage exists at all ridgetop locations with the project area. No impacts to schools, parks, or other public facilities are foreseeable.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>XVI. RECREATION. Would the project:</b>				
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 checked="" type="checkbox"/>	<input type="checkbox"/>

**Discussion:**

a.-b. The project increases the supply of outdoor recreation opportunities. It will not increase the physical deterioration of any existing facility. As analyzed and mitigated elsewhere in this document, the recreational facilities included

in this project, which will largely consist of an expansive network of natural surface singletrack multi-use trails, will not have a potentially significant negative impact on the environment.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>XVII. TRANSPORTATION. Would the project:</b>				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or be inconsistent with CEQA Guidelines §15064.3(b)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature, (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Discussion:**

a.-b. Access to Suscol Headwaters will be primarily via a combination of a new trailhead access point off North Kelly Road proximate to Camino Dorado and via Skyline Wilderness Park and its existing trail network. Based on annual users of approximately 25,000, busy weekends at Skyline Wilderness Park see approximately 300 visitors, while off-season weekdays approximately 20 visitors and there is an overall daily average of slightly less than 69 visitors. At +/- 700 acres, Suscol Headwaters Park is only marginally smaller than Skyline. Skyline, however, has a number of facilities that are not envisioned at Suscol, including tent and RV camping, a native plant garden, an archery range, a frisbee golf course, a bicycle pumptrack, a social hall, and fields for community gatherings like Boy Scout jamborees and festivals of creative anachronism. Suscol Headwaters, as planned, would have only a network of multi-use trails. Given the significant disparities in the scope of operation between the two parks, the original initial study for Phase 1 of Suscol Headwaters assumed that the visitation at Suscol would represent perhaps a 10% increase over baseline levels of visitation at Skyline. At full buildout, a conservative estimate of average annual vehicle trips generated by Suscol Headwaters and served by its less-than 25 car parking lot would be perhaps 30% of the visitation to Skyline or 20 trips. An aggressive scenario, envisioning a Suscol Headwaters with such an appealing and regionally-attractive trail network that it sees immediate high demand would be perhaps 50% of Skyline’s average daily visitation, or 35 trips.

The new CEQA Guidelines and the OPR Technical Advisory note that CEQA provides a categorical exemption (Section 15303) for additions to existing structures of up to 10,000 square feet, so long as the project is in an area that is not environmentally sensitive and where public infrastructure is available. OPR determined that “typical project types for which trip generation increases relatively linearly with building footprint (i.e., general office building, single tenant office building, office park, and business park) generate or attract 110-124 trips per 10,000 square feet”. They concluded that, absent substantial evidence otherwise, the addition of 110 or fewer daily trips could be presumed to have a less than significant VMT impact. A maximum of 35 average daily trips is foreseeable as a result of this project., well below that significance threshold.

Napa County maintains a set of Transportation Impact Study Guidelines (TIS Guidelines) that define situations and project characteristics that trigger the need to prepare a TIS. The purpose of a TIS is to identify whether the project is likely to cause adverse physical or operational changes on a County roadway, bridge, bikeway or other

transportation facility, to determine whether the project should be required to implement or contribute to improvement measures to address those changes, and to ensure that the project is developed consistent with the County's transportation plans and policies. Per Napa County's current TIS Guidelines, a project is required to prepare a TIS if it generates 110 or more net new daily vehicle trips. A maximum of 35 average daily trips is foreseeable as a result of this project., well below that significance threshold.

There is existing access to Skyline Wilderness Park via a continuous off-road trail system, including the Napa River, Bay, Vine, and Ridge Trails, from central Napa to the River to Ridge Trail entrance. Some portion of the new Suscol Headwaters Park users will arrive via bike and will not contribute to increased traffic. The project does not conflict with any applicable congestion management program or other standards adopted by the Napa County Transportation Planning Agency.

- c. The project would result in a potential minor increase in the number of people entering or leaving Skyline Park using Imola Road and Fourth Avenue. The access driveway to the park is located on the outside circumference of a curve in the road, at a location where there are good sight distances to both Imola Road and Fourth Avenue. The new trailhead parking lot and access point off of North Kelly Road will likewise generate some new traffic, but given the moderate baseline level of traffic on that road segment, the excellent sightlines, and the proposed entrance's location in line with Camino Dorado and its existing lefthand turn lane, impacts due to design features and incompatible vehicle types there are expected to be less than significant. There will also be minor increases in use of the River to Ridge entrance and associated parking off Streblov Drive. This access driveway is located on a straight segment of road with unobstructed views in both directions. Thus, the modest increase in turning movements at these locations should not create any increased safety risk.
- d. The entrance and main parking within Skyline Wilderness Park is paved and provides access to the staging area for both Skyline and Suscol Headwaters. South of the main entrance are existing trails that traverse Skyline connecting to the proposed trails on the Suscol property. While these are not passable by standard on-road vehicles, they can be traveled by ATV. There is also a network of existing ranch roads, which require a high clearance/four-wheel drive vehicle, that provide access from State Route 221 to much of the project property, and to Skyline. The District has right of administrative access using these roads. Although these roads do not reach Skyline, they provide much closer vehicular access to the southern-most portions of that park, thereby improving emergency access to that property as well as the project property. Thus, emergency access for purposes of rescuing an injured user is as good as or better than is typical for a regional park.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XVIII. TRIBAL CULTURAL RESOURCES.</b> Would the project:				
<b>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:</b>				
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"/>
a) 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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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.

**Discussion:**

a-b. As discussed in Section V (**Cultural Resources**) the Cultural Resources Study prepared for the Suscol Mountain Vineyard ECP did not identify any historic or archaeological resources onsite. As such, no resources listed or eligible for the California Register of Historical Resources (CRHR) are present and impacts to tribal cultural resources as a result of the proposed project are considered to be less than significant. Furthermore, no resources that may be significant pursuant to Public Resources Code Section 5024.1(c) have been identified or are anticipated onsite. The Cultural Resources protections noted in the project descriptions will avoid and reduce potential impacts to unknown resources.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>XIX. UTILITIES AND SERVICE SYSTEMS. Would the project:</b>				
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 telecommunication facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a determination by the 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 checked="" type="checkbox"/>	<input 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.-c. The project will not require any new or expanded public sewage or water system. No new public water use is proposed. There will be no significant increase in storm water runoff, and no need for new storm water conveyance or treatment facilities.

d.-e. The project is intended to be a zero waste facility to the greatest practical extent, and the public will be advised to pack out what they pack in. Any new recycling or trash containers resulting from the project would be limited.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>XX. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire severity zones, would the project:</b>				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Due to slope, prevailing winds and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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:**

h. According to CalFire, the project is located in an area which is subject to moderate risk of wildland fires (on a scale of low, moderate, high, and very high). The project area was burned in a back-fire lit in the fight against the 2017 Atlas Peak fire. There are no project features that would impair an adopted emergency response plan or evacuation plan. No new overhead power line infrastructure would be required for the development of the project. The project is not expected to create a significant increased risk of wildland fire for the following reasons:

- The general public will not be allowed to drive cars, trucks, motorcycles, ATV's, or other motorized recreational equipment on the property except within the gravel parking lot.
- Only trained staff or volunteers will use motorized maintenance equipment, and its use will be limited to low-fire hazard periods.
- The public will not be permitted to smoke while in the park.
- Park activities will be limited as appropriate, up to and including full park closure, as needed during periods of extreme wildfire hazard as determined by the County Fire Marshall or Red Flag Warnings as determined by the National Weather Service and additionally whenever in the District's judgment the combination of forecasted temperature, humidity, and wind suggest extreme wildfire hazard.
- No open fires will be allowed anywhere within the preserve.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>XXI. MANDATORY FINDINGS OF SIGNIFICANCE</b>				
a) Does the project have the potential to 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, 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 checked="" type="checkbox"/>	<input type="checkbox"/>

**Discussion:**

- a. As designed, the project will have a less than significant adverse impact on wildlife resources, and in many ways will actually improve wildlife habitat (particularly for the California Red-legged frog). The project will not result in a significant loss of native trees, native vegetation, or important examples of California's history or pre-history. In addition, because the property is in public ownership, with only light, nature-based recreational usage, significant natural plant and animal communities will be permanently protected.
- b. The proposed project does not have impacts that are individually limited but cumulatively considerable.
- c. There are no environmental effects caused by this project that would result in substantial adverse effects on human beings, whether directly or indirectly. No significant hazardous conditions resulting from this project have been identified. The project would not have any environmental effects that would result in significant impacts.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>XXII. SUBSEQUENT EIR OR NEGATIVE DECLARATION</b>				
a) Are substantial changes proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
b) Are substantial changes proposed in the project which will require major revisions of the previous EIR or negative declaration due to a substantial increase in the severity of previously identified significant effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Have substantial changes occurred with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Have substantial changes occurred with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to a substantial increase in the severity of previously identified significant effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Has new information of substantial importance been identified, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted which shows any of the following:				
1. The project will have one or more significant effects not discussed in the previous EIR or negative declaration.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Significant effects previously examined will be substantially more severe than shown in the previous EIR.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents have declined to adopt the mitigation measure or alternative.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents have declined to adopt the mitigation measure or alternative.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion:

a.-e. The proposed Phase 2 of Suscol Headwaters Park is largely consistent with the scope of Phase 1, for which a mitigated negative declaration was adopted by both the Napa County Regional Park and Open Space District and the Napa County Planning Commission in 2020. The revised Phase 2 project simply expands the proposed trail network south of the main Jameson Canyon ridgeline and incorporates a new trailhead and trailhead parking lot accessible off of North Kelly Road. No new information has been identified since the adoption of the previous

Mitigated Negative Declaration (MND) for the Suscol Headwaters Park that calls into question the environmental determinations of that previous document. All additional development proposed in Phase 2 is adequately analyzed in this revised document and all impacts are less than significant as mitigated.



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### Summary of Mitigation Measures:

**Mitigation Measure Biological Resources 1:** Prior to the start of construction, a qualified biologist will flag the existing eight streamside daisy plants plus a 10-foot buffer surrounding the plants, such that all trail construction will avoid the plants.

**Mitigation Measure Biological Resources 2:** Prior to the start of any trail construction in or near the wooded riparian zone of Fagan Creek, a qualified biologist will conduct a focused in-season (May to July) survey to identify and flag any Narrow-anthered Brodiaea there-existing. Construction near any discovered plants shall maintain a 10-foot buffer, such that all trail construction will avoid the plants.