

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

Initial Study Checklist
(form updated January 2019)

1. **Project Title:** Napa 55 Logistics, Use Permit #P19-00421-UP
2. **Property Owner:** Napa 55 Logistics, LLC, 8775 Folsom Blvd, Suite 200, Sacramento CA 95826; Phone: (916)-381-1561, Email: tschaedler@panattoni.com
3. **Project Sponsor's Name and Address:** Sonya Kinz, Panattoni Development Company, Inc., 8775 Folsom Blvd Suite 200, Sacramento CA 95826; Phone: (916)-379-1145, Email: skinz@panattoni.com
4. **Representative:** Sonya Kinz, Panattoni Development Company, Inc., 8775 Folsom Blvd Suite 200, Sacramento CA 95826; Phone: (916)-379-1145, Email: skinz@panattoni.com
5. **County Contact Person, Phone Number and Email:** Trevor Hawkes, Supervising Planner; Phone: (707) 253-4388, Email: trevor.hawkes@countyofnapa.org
6. **Project Location and APN:** 11 Basalt Road, Napa, CA 94559. The project is proposed on a 55.27-acre site approximately 900 feet east from the intersection of Basalt Road and Highway 221. Section 23, Township 5 North, Range 4 West of the Napa California 7.5-minute USGS quadrangle. 38°16'0.30" North Latitude and 122°16'2.72" West Longitude APN: 046-370-024.
7. **General Plan Description:** Study Area
8. **Zoning:** Industrial (I)
9. **Project Description:** Approval of a Use Permit for a new 697,000 sq. ft. warehouse/industrial facility comprised of four total buildings on an existing, developed industrial site with associated infrastructure. Current tenancy for the four (4) speculative structures is unknown. The applicant proposes to demolish an existing 100,000 sq. ft. building, another 6,000 sq. ft. building and other remnants from prior industrial uses including the storage yards, trailer parking, old casting equipment and outbuildings and steel fabrication areas. Approximately 450 new trees and landscape screening would be planted to help screen the new construction. The project assumes an upper estimate of 250 employees would be on the property at one time at full occupancy, given the likely tenant makeup of the proposed project. The project includes 484 parking spaces. In addition, the proposed project includes loading spaces for delivery trucks.

The site has historically received water from an offsite well southeast of the project site at Latour Court through a water agreement entered into by previous sellers and buyers of the site. The applicant intends to continue using the well and meet the required volume for irrigation, fire and domestic water with appropriately sized storage tanks and pumps. The site is also currently serviced with septic for sewer waste and the applicant intends to build a new septic system and field to accommodate the new development and forecasted capacity.

10. **Describe the environmental setting and surrounding land uses.**

The site is a large irregular shaped parcel with gently sloping flatter elevations on the west side of the property ranging from approximately 38 to 60 feet above mean sea level (amsl) with slopes ranging between zero (0) to five (5) percent. The eastern edge of the site is characterized by three small knolls ranging from 80 feet amsl to 106 feet amsl with slopes ranging between zero (0) to 15 percent. Geologic maps indicate the site is underlain by alluvium, dacite, and mafic flows and breccias. The project parcel is comprised of four soil types: Coombs gravelly loam, two (2) to five (5) percent slopes, Haire loam, two (2) to nine (9) percent slopes, Haire clay loam, 15 to 30 percent slopes and Hambrock rock-Outcrop Complex, 30 to 75 percent slope. The project parcel is bordered by Arroyo Creek along its northern boundary and an unnamed blue line stream along the southern boundary. Vegetation communities on the site include Riparian Woodland along a narrow strip of Arroyo Creek and in shrub understorey on the eastern side of the project parcel and a small stand of Oak Woodland in a northeastern section of the project parcel. The remainder of the site consists of the associated abandoned and functioning buildings, parking lots, internal roads, and various areas of debris.

West of the project parcel is the Napa County jail site and State Route 221 further to the west. Beyond State Route 221 is the Napa Golf Course. There are industrial uses to the east, including the Syar rock-quarry facility. North of the unnamed drainage is the Napa State Hospital facility. South of the blue line stream is vineyards.

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

Discretionary approval required by Napa County consists of a use permit. The proposed project would also require various ministerial approvals by the County including, but not limited to building permits, grading permits, encroachment permits (for any work conducted within the County right-of-way). A Storm Water Pollution Prevention Plan (SWPPP) is required to meet San Francisco Regional Water Quality Control Board standards and is administered by the Engineering Services Division. Restoration work would be subject to U.S. Clean Water Act, Section 404 permitting by the Army Corps of Engineers (Corps), Section 401 Water Quality Certification by the Regional Water Quality Control Board (RWQCB) and a Section 1602 Lake and Streambed Agreement from the Department of Fish & Wildlife. Remediation work for existing unpermitted solid waste disposal sites is currently being conducted by Napa County as the Local Enforcement Agency, and completion of this work will be required prior to various ministerial approvals.

Responsible (R) and Trustee (T) Agencies

California Department of Fish and Wildlife
Regional Water Quality Control Board
Army Corp of Engineers
Bay Area Air Quality Management District
Department of Toxic Substances

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

On March 30, 2020, County Staff sent invitations to consult on the proposed project to Native American tribes who had a cultural interest in the area and who as of that date had requested to be invited to consult on projects, in accordance with the requirements of Public Resources Code section 21080.3.1. A response was received from the Yocha Dehe Wintun Nation on March 30, 2020, that indicated that the project site was located within their aboriginal territories and that the tribe had concerns that the project could impact unknown cultural resources. The tribe requested a site visit to evaluate those cultural concerns. Due to project delays and meeting complications caused by the COVID-19 pandemic, the site visit was delayed. On October 18, 2022, a second round of invitations to consult on the proposed project was sent to Native American tribes who had a cultural interest in the area and who as of that date had requested to be invited to consult on projects. A response was received from the Yocha Dehe Wintun Nation on December 6, 2022, that indicated that the project site was located within their aboriginal territories, thus they have a cultural interest in the proposed project area and requested to be kept informed of the project. No consultation was requested at this time.

On October 25, 2024, due to discrepancies between the previous responses, County Staff contacted the Yocha Dehe Cultural Resources offices to confirm whether the tribe was interested in consulting on the project. A tribal consultation meeting was requested for November 14, 2024. In that meeting representatives from the Yocha Dehe Wintun Nation expressed a desire for the County to include mitigation measures for onsite tribal cultural resource monitoring and cultural resource identification training before ground disturbance.

No other responses from tribes were received from either the March 30, 2020, or October 13, 2022, notification letters.

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

ENVIRONMENTAL IMPACTS AND BASIS OF CONCLUSIONS:

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

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier 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.

Trevor Hawkes

Signature

12/13/2024

Date

Name: Trevor Hawkes, Supervising Planner
Napa County
Planning, Building and Environmental Services Department

I. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion:

- a/b. The proposed project would not be located within an area which would damage any known scenic vista, or damage scenic resources, trees, rock outcroppings, or historic buildings. The proposed project would demolish existing structures develop the structures within areas of previous disturbance. The remainder of the project site would remain undeveloped. The site is not visible from a scenic highway or any scenic routes. No impacts.
- c. The proposed development area is located on the east side of State Route 221 and will be adjacent to the new Napa County jail site and the Syar Quarry. The history of prior tenants and uses have left this site and its existing buildings in poor condition. The project proposes to demolish the existing industrial buildings and infrastructure and, in its place, develop new speculative warehouse type buildings and infrastructure. Exterior building materials for the proposed buildings will feature muted colors and finishes including pre-finished metal roof panels and wall systems, and in general would be in better condition than existing buildings. Therefore, the project will not substantially degrade the existing visual character or quality of the site and surrounding area. Impacts would be less than significant.
- d. The proposed project will result in increases in the nighttime lighting. In accordance with County standards, all exterior lighting will be the minimum necessary for operational and security needs. Light fixtures will be kept as low to the ground as possible and include shields to deflect the light downward. Avoidance of highly reflective surfaces will be required, as well as standard County conditions to prevent light from being cast skyward. As designed, and as subject to the standard conditions of approval, below, the project will not have a significant impact resulting from new sources of outside lighting.

4.9 GENERAL PROPERTY MAINTENANCE – LIGHTING, LANDSCAPING, PAINTING, OUTDOOR EQUIPMENT STORAGE, MECHANICAL EQUIPMENT, AND TRASH ENCLOSURE AREAS

- a. All lighting shall be permanently maintained in accordance with the lighting and building plans approved by the County.

6.3 LIGHTING – PLAN SUBMITTAL

- a. Two (2) copies of a detailed lighting plan showing the location and specifications for all lighting fixtures to be installed on the property shall be submitted for Planning Division review and approval. All lighting shall comply with the CBC.
- b. All exterior lighting, including landscape lighting, shall be shielded and directed downward; located as low to the ground as possible; the minimum necessary for security, safety, or operations; on timers; and shall incorporate the use of motion detection sensors to the greatest extent practical. All lighting shall be shielded or placed such that it does not shine directly on adjacent properties or impact vehicles on adjacent streets. No flood-lighting or sodium lighting of the building is permitted, including architectural highlighting and spotting. Low-level lighting shall be utilized in parking areas as opposed to elevated high-intensity light standards.

Mitigation Measures: None are required

II.	AGRICULTURE AND FOREST RESOURCES. ¹ Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
	a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	c) Conflict with existing zoning for, or cause rezoning of, forest land as defined in Public 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/b. The project would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as shown on the Napa County GIS map (*Department of Conservation Farmlands 2024 Napa County Farmlands layer*) because no land with this designation exists on the site. The site exists entirely within an Industrial zoning designation. The project site is not subject to a Williamson Act contract. No Impact.
- c/d. The site project parcel does not contain any existing zoning of forest land or timberland nor would the request cause a rezoning. Therefore, the proposed project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. According to the Napa County Environmental Resource Maps (based on the following layers – Sensitive Biotic Oak woodlands, Riparian Woodland Forest and Coniferous forest) and the Wetland and Biological Resource Assessment by Barnett Environmental (June 2022) the development area does not contain woodland or forested areas. Therefore, the proposed project would not 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. No Impact.
- e. Considering the existing land uses and surrounded land uses there is nothing in the physical or operational aspects of the proposed project that would result in the conversion of farmland to non-agricultural use. No Impact

Mitigation Measures: None are required.

¹ "Forest land" is defined by the State as "land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits." (Public Resources Code Section 12220(g)) The Napa County General Plan anticipates and does not preclude conversion of some "forest land" to agricultural use, and the program-level EIR for the 2008 General Plan Update analyzed the impacts of up to 12,500 acres of vineyard development between 2005 and 2030, with the assumption that some of this development would occur on "forest land." In that analysis specifically, and in the County's view generally, the conversion of forest land to agricultural use would constitute a potentially significant impact only if there were resulting significant impacts to sensitive species, biodiversity, wildlife movement, sensitive biotic communities listed by the California Department of Fish and Wildlife, water quality, or other environmental resources addressed in this checklist.

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

Discussion:

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

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

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

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

a/b. The project sponsor contracted with GHD consultants to provide an Air Quality Analysis in June 2022. The mountains bordering Napa Valley block much of the prevailing northwesterly winds throughout the year. Sunshine is plentiful in Napa County, and summertime can be very warm in the valley, particularly in the northern end. Winters are usually mild, with cool temperatures overnight and mild-to-moderate temperatures during the day. Wintertime temperatures tend to be slightly cooler in the northern end of the valley. Winds are generally calm throughout the county. Annual precipitation averages range from about 24 inches in low elevations to more than 40 inches in the mountains.

Ozone and fine particle pollution, or PM_{2.5}, are the major regional air pollutants of concern in the San Francisco Bay Area. Ozone is primarily a problem in the summer, and fine particle pollution in the winter. In Napa County, ozone rarely exceeds health standards, but PM_{2.5} occasionally does reach unhealthy concentrations. There are multiple reasons for PM_{2.5} exceedances in Napa County. First, much of the county is wind-sheltered, which tends to trap PM_{2.5} within the Napa Valley. Second, much of the area is well north of the moderating temperatures of San Pablo Bay and, as a result, Napa County experiences some of the coldest nights in the Bay Area. This leads to greater fireplace use and, in turn, higher PM_{2.5} levels. Finally, in the winter easterly winds often move fine-particle-laden air from the Central Valley to the Carquinez Strait and then into western Solano and southern Napa County (BAAQMD, In Your Community: Napa County, April 2016)

The impacts associated with implementation of the project were evaluated consistent with guidance provided by BAAQMD. Ambient air quality standards have been established by state and federal environmental agencies for specific air pollutants most pervasive in urban environments. These pollutants are referred to as criteria air pollutants because the standards established for them were developed to meet specific health and welfare criteria set forth in the enabling legislation. The criteria air pollutants emitted by development, traffic and other activities anticipated under the proposed development include ozone, ozone precursors oxides of nitrogen and reactive organic gases (NO_x and ROG), carbon monoxide (CO), nitrogen dioxide (NO₂), and suspended particulate matter (PM₁₀ and PM_{2.5}). Other criteria pollutants, such as lead and sulfur dioxide (SO₂), would not be substantially emitted by the proposed development or traffic, and air quality standards for them are being met throughout the Bay Area.

The 2017 Clean Air Plan contains 85 individual control measures in nine economic sectors: stationary (industrial) sources, transportation, energy, buildings, agriculture, natural and working lands, waste management, water, and GHG pollutants. Many of these control measures require action on the part of the BAAQMD, the CARB, or local communities, and are not directly related to the actions undertaken for a commercial project. The Project would not prevent the BAAQMD from implementing these actions and none apply directly to the Project.

The 2017 Clean Air Plan contains air pollutant reduction strategies based growth forecasts, and those growth forecasts are defined in consultation with the Association of Bay Area Governments (ABAG) and local governments and with reference to local general plans. Projections for achieving air quality goals are based on assumptions regarding population, housing, and growth trends. Therefore, if the Project is consistent with the assumptions used in preparing the forecasts presented in the 2017 Clean Air Plan, then the growth associated with the Project is consistent with the 2017 Clean Air Plan. The Napa County 2008 General Plan was prepared prior to the development of the 2017 Clean Air Plan; therefore, 2017 Clean Air Plan growth assumptions include the growth projected by the 2008 General Plan. The Project is consistent with the General Plan land use designation for the site; therefore, the Project would not exceed the growth assumptions contained in the 2017 Clean Area Plan and the impact would be less than significant.

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

As mentioned above, in 2010, the BAAQMD adopted and later incorporated into its 2011 CEQA Guidelines project screening criteria (Table 3-1 – Operational-Related Criteria Air Pollutant and Precursors Screening Level Sizes) and thresholds of significance for air pollutants, which have now been updated by BAAQMD through May 2017. The proposed project is located on approximately 55.27 acres of the project site and would include 697,000 square feet of building floor area. When compared to the BAAQMD's operational criteria pollutant screening size of 864,000 square feet for general warehouse facilities for NO_x (oxides of nitrogen) the project would not significantly impact air quality and does not require further study (BAAQMD CEQA Guidelines, May 2017 Pages 3-2 & 3-3.), would not contribute a significant amount of air pollution, and would not result in a conflict or obstruction of an air quality plan. The project falls below the screening criteria as noted above, and consequently will not significantly affect air quality individually or contribute considerably to any cumulative air quality impacts. Furthermore, GHD evaluated the project related to construction and operational period impacts based on BAAQMD thresholds.

Construction

Construction activities are anticipated to take approximately 12 months to complete, which would include demolition, site grading, construction of athletic facilities, drainage improvements, ancillary buildings, and installation of sports lights.

Localize PM Emissions (Fugitive Dust)

For construction-related PM_{2.5} and PM₁₀ dust, the BAAQMD recommends incorporation of best management practices (BMPs) to reduce localized dust impacts to less than significant. As described in Section 2.3, Construction Best Management Practices, the Project would incorporate the BAAQMD's Basic Construction Measures for fugitive dust. Therefore, the Project would adhere to the basic construction measures recommended by BAAQMD, and the construction-phase impacts from fugitive PM_{2.5} and PM₁₀ dust would be less than significant.

Exhaust Criteria Pollutants

The types of air pollutants generated by construction activities are typically nitrogen oxides and particulate matter, such as dust and exhaust. Construction activities could temporarily increase levels of PM_{2.5} and PM₁₀ downwind of construction activity. These are temporary emissions that vary considerably from day-to-day and by the type of equipment and weather. In addition, CO and reactive organic gases are emitted during operation of gas and diesel-powered construction equipment.

Construction-related air pollutant emissions were estimated for the Project using CalEEMod version 2020.4.0. The Project's calculated total construction exhaust emissions were averaged over the estimated working days (12 months, 22 working days per month, for 264 total working days). The average daily emissions were then compared to the BAAQMD thresholds of significance for criteria pollutants. As shown in Table 12 of the GHD report (page 32), the estimated construction-related emissions are less than the thresholds of significance adopted by the BAAQMD. Therefore, the impact from construction related emissions would be less than significant.

Operation

Following construction, operation of the Project results in operational trips, as well as energy consumption. Project operational emissions were estimated using CalEEMod version 2020.4.0. As shown in Table 13 in the GHD report (page 33), the Project's operational emissions are below the BAAQMD's thresholds. Therefore, the Project's operational emissions are considered to have a less than significant impact.

- c. In the short term, potential air quality impacts are most likely to result from earthmoving and construction activities required for project construction. Earthmoving and construction emissions would have a temporary effect; consisting mainly of dust generated during grading and other construction activities, exhaust emissions from construction related equipment and vehicles, and relatively minor emissions from paints and other architectural coatings. If grading were to result in off or on-haul of soils, these potential construction impacts would be temporary in nature and subject to standard conditions of approval from the Engineering Division as part of the grading permit or building permit review process.

Sensitive receptors are defined by the BAAQMD as facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. The nearest potential sensitive receptors are the residential units at the Napa State Hospital located approximately 350 feet north of the project boundary, and approximately 680 feet away from the limits of project-associated heavy-truck activity. No other sensitive receptors are located within 1,000 feet of the project boundary.

Construction equipment and heavy-duty truck traffic generate diesel particulate matter (DPM) exhaust, which is a known toxic air contaminant. DPM is a human carcinogen and chronic (long-term) inhalation exposure to DPM poses a chronic health risk. As described in Section 2.3, Construction Best Management Practices, the Project would incorporate the BAAQMD's Basic Construction Measures. These measures also reduce DPM emissions.

Due to short construction duration (12 months), size of the project site and continuous shifting of the construction activities, and the distance from the Project activity to the residences, prolonged exposure of sensitive receptors to substantial pollutant concentrations would not occur. The impact would be less than significant.

During Project operations, the project is anticipated to generate 2,329 total weekday trips, approximately 350 trips per day would be truck trips (W-Trans 2021). Onsite truck activity would be approximately 680 feet away from the nearest location of sensitive receptors.

For reference, the CARB Air Quality and Land Use Handbook: A Community Health Perspective (Land Use Handbook) provides CARB's recommendations regarding the siting of new sensitive land uses near facilities that are associated with health risks, particularly from air toxic emissions. The Land Use Handbook has siting guidance for freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities. Although this guidance is for siting new locations of sensitive receptors, the facility distance and size guidance may be used as a screening level to identify when additional analysis is warranted during environmental review, including CEQA.

The Land Use Handbook advisory recommendation for relevant land uses are:

Freeways and High Traffic Roads

- Avoid siting new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day.

At 2,329 total weekday trips, 350 of which would be trucks, the Project's vehicle activity would comprise a fraction of the sizes warranting recommended distances as contained in the CARB's Land Use Handbook. Due to the distance from truck ingress/egress and receptors and limited number of truck trips, exposure of sensitive receptors to substantial pollution concentration would be less than significant.

In addition, the Air District recommends incorporating feasible control measures as a means of addressing construction impacts. If the proposed project adheres to these relevant best management practices identified by the Air District and the County's standard conditions of project approval, construction-related impacts will not expose sensitive receptors to substantial pollutant concentrations and are

considered less than significant:

7.1 SITE IMPROVEMENT

c. AIR QUALITY

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

1. *Post a publicly visible sign with the telephone number and person to contact at the lead agency regarding dust complaints. The BAAQMD's phone number shall also be visible.*
2. *Water all exposed surfaces (e.g., parking areas, staging areas, soil piles, grading areas, and unpaved access roads) two times per day.*
3. *Cover all haul trucks transporting soil, sand, or other loose material off-site.*
4. *Remove all visible mud or dirt tracked onto adjacent public roads by using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.*
5. *All vehicle speeds on unpaved roads shall be limited to 15 mph.*
6. *All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.*
7. *Idling times shall be minimized either by shutting off equipment when not in use or reducing the maximum idling time to five (5) minutes (as required State Regulations). Clear signage shall be provided for construction workers at all access points.*

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

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

7.1. SITE IMPROVEMENT

b. DUST CONTROL

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

- d. The Air District defines public exposure to offensive odors as a potentially significant impact, light industrial or manufacturing uses are not known operational producers of pollutants capable of causing substantial negative impacts to sensitive receptors. Implementation of the Project would not result in major sources of odor. The Project type is not one of the common types of facilities known to produce adverse odors (i.e., landfill, coffee roaster, wastewater treatment facility, etc.). Minor odors from the use of equipment during construction activities would be intermittent and temporary and would dissipate rapidly from the source with an increase in distance. In addition, operation of the Project would not result in locating sensitive receptors near an existing odor source. Thus, the Project would not create objectionable odors affecting a substantial number of people. The project will not create pollutant concentrations or objectionable odors affecting a substantial number of people. The impact would be less than significant.

Mitigation Measures: None are required.

IV. BIOLOGICAL RESOURCES. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

A Wetland and Biological Resources Assessment Report, dated June 2022, was prepared by Barnett Environmental as part of the project application. A Barnett Environmental biologist surveyed the Study Area on January 10, 2020, for special status plant and wildlife species and their habitats that could be supported onsite. The parcel is a partially abandoned industrial/commercial site with a large asphalt pavement area, and surrounding uses include industrial and agricultural. The Study Area is located on the east side of Highway 221 near the intersection Basalt Road and California Highway 221 in southern Napa County and is within the Napa River watershed (HCU10#18050002). Water enters the Study Area either by direct precipitation or via Arroyo Creek on the parcel's northern boundary. Two North-South ditches, excavated on the old lumberyard property in the early 1960s to collect and drain runoff into Arroyo Creek, are still apparent today. The longer, westernmost of these ditches appears to collect a greater volume of runoff water (i.e. from a larger area) than the eastern ditch and consequently appears to support a more robust vegetation community. A total of 0.857 acres of "other waters of the U.S." were mapped within Study Area: 0.617 acre consists of Arroyo Creek (a tributary of Tulucay Creek, which is a tributary of the Napa River) along the project's northern boundary; and 0.240 acre consists of two N-S ditches off Tulucay Creek (see Table 1 and Figure 5 in the Barnett report).

The Study Area has the potential to support special-status plants and wildlife; however, surveys conducted by Barnett Environmental in January of 2020, which included observations of dominant plant communities, plant and animal species, and suitability of onsite habitat to support special status plant or animal species did not identify any potential occurrences. Therefore, there are no impacts to such species. The California Natural Diversity Database (Rarefind) contains no records of any species of special concern within the Study Area. While the species listed in the Barnett report could occur in the Project region, preconstruction surveys would confirm presence/absence of these species at the time of the proposed construction and ensure no adverse effect to any species encountered. The Study Area does not contain Critical Habitat, Essential Fish Habitat, or wildlife corridors.

Sierra Nevada Arborists prepared a revised Arborist Report and Tree Inventory Summary on May 19, 2022, for the trees located within and/or overhanging the Project site. The Arborist Report and Tree Inventory Summary was prepared by Edwin E. Stirtz, ISA Certified Arborist WE-0510A, who conducted field reconnaissance and inventory efforts on September 3 and 12, 2019.

- a. The June 2022 field survey did not identify any candidate or special status species on the project site. While no species were observed during the field survey, a review of the California Natural Diversity Database (CNDDDB), California Native Plant Society (CNPS) Rare Plant Program and U.S. Fish and Wildlife Service Information for Planning and Consultation resource list (iPAC) indicates that Western Pond Turtle (*Emmys marmorata*), Swainson's Hawk (*Buteo swainsoni*) and California red-legged frog (CRLF, *Rana draytonii*) have the potential for occurring on the site. Pre-construction surveys for CLRF (**Mitigation Measure BIO-1**), Swainson's Hawk (**Mitigation Measure BIO-2**) and Western Pond Turtle (**Mitigation Measure BIO-3**) are recommended to ensure that the implementation of the Proposed Project would reduce impacts to any special-status species, including migratory birds protected under the MBTA, to a level of less than significant.
- b/c. A total of 0.857 acres of "other waters of the U.S." were mapped within the project parcel. The project itself does not propose development within the riparian habitat along Arroyo Creek nor within Napa County's Stream setback for Arroyo Creek. Prior uses on the site have installed unpermitted improvements or caused vegetation removal within this riparian zone through the inclusion of asphalt, a fence, an above-ground concrete drainage channel, large stockpile of sediment material and other various industrial detritus. As part of the proposal the applicant intends to restore the riparian zone to pre-existing natural conditions through the removal of unpermitted improvements and restoration of disturbed/paved areas. Restoration work within this area would be subject to U.S. Clean Water Act, Section 404 permitting by the Army Corps of Engineers (Corps), Section 401 Water Quality Certification by the Regional Water Quality Control Board (RWQCB) and a Section 1602 Lake and Streambed Agreement from the Department of Fish & Wildlife. Implementation of **Mitigation Measure BIO-4**, below, would ensure that the applicant's restoration plan meets Federal and State standards prior to work within these affected areas.
- d. According to the Napa County Environmental Resource Maps (based on the following layers – water bodies, vernal pools & vernal pool species) there are no wetlands on or within the project site that would be affected by this project. Although there is a riverine channel, Arroyo Creek, on the north end of the project, no development is proposed within 50 feet of the channel, and therefore does not have any potential for impacts. The project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or within their corridors or nursery sites. As mentioned above, the project site is primarily disturbed and developed with existing industrial uses and exhibits little quality habitat.
- e. The project would not conflict with any local policies protecting biological resources, such as tree preservation or the County's Conservation Regulations. The project's development footprint is designed outside of the two sensitive biotic communities identified on the Project parcel; Riparian Woodland and Oak Woodland. An Arborist Report and Tree Inventory Summary submitted by Sierra Nevada Arborists (May, 2022) identified 227 inventoried trees on the project site measuring 6 inches in diameter or larger, with 27 of those trees identified as 'precaution trees' trees due to identified defects, compromised health and/or structural instability noted at the time of field inventory. Some of these trees would be removed as part of the project, but they do not exist within the sensitive biotic communities identified in the Barnett Report. The project parcel has an Industrial zoning district designation and is not subject to the Vegetation Retention Requirements in NCC 18.108.020 or the Vegetation Removal Mitigation in NCC 18.108.020.D found in the County's Conservation Regulations. No development would take place on slopes exceeding 30%. Impacts would be less than significant. Approximately 450 new trees are planned for landscaping/screening purposes, 110 of which are planned as Oak species (Valley Oak, Shumard Red Oak, Interior Live Oak), which would more than compensate the County's 2:1 replacement ratio for removed Oak Trees.
- f. The proposed project would not conflict with the provisions of adopted Habitat Conservation Plans, Natural Community Conservation Plans or other approved local, regional or state habitat conservation plans. There are no plans applicable to the subject parcel.

Mitigation Measures

Mitigation Measure BIO-1; Frog Pre-construction Protocol Surveys: Because there is potential for certain species to occur in the Study Area, preconstruction surveys would confirm presence/absence of these species at the time of the proposed construction and ensure no adverse effect to any species encountered. The following measures are recommended to avoid or otherwise minimize potential impacts to these species.

1. If earth disturbing activities, vegetation clearing and/or construction activities would take place during the reproductive seasons for California red-legged frog or foothill yellow-legged frog (November–July) a qualified biologist shall conduct a preconstruction survey 24 hours before the initiation of those activities along the riparian zone of Arroyo Creek.
2. Should any California red-legged frogs be present within the development area during the preconstruction survey, no work shall begin. The qualified biologist shall contact Napa County, USFWS, and CDFW within 24 hours of the observation. Work shall not begin until USFWS has provided authorization, and the frog has left on its own accord. If foothill yellow-legged frogs are discovered during the preconstruction survey, the qualified biologist shall contact Napa County and CDFW within 24 hours, and project construction shall not begin until CDFW provides written permission to do so.
3. A copy of the preconstruction survey results, that includes any find and relocation efforts shall be provided to Napa County and CDFW before project vegetation removal or earth-disturbing activities begin.

Method of Monitoring: If construction/earthmoving activity is to occur between November 1st and July 31st the survey prepared by a qualified biologist shall be submitted to Planning Division staff 24 hours prior to initiation of earth disturbing activities, vegetation clearing and/or construction activities.

Mitigation Measure BIO-2; Swainson’s Hawk Pre-construction Protocol Surveys: Because there is potential for certain species to occur in the Study Area a preconstruction raptor survey during the hawk’s breeding period would reveal its presence or absence within the Study Area. Therefore, prior to issuance of a grading permit for development:

1. A pre-construction nesting bird survey shall be conducted on-site within 15 days prior to construction, vegetation clearing and/or earth disturbing activities if those activities would commence between March 1st and September 1st (“the nesting season”). If disturbance associated with the project would occur outside of the nesting season, no surveys shall be required.
2. If Swainson’s hawk are identified as nesting on the project site, a non-disturbance buffer of 75-feet shall be established or as otherwise prescribed by a qualified ornithologist. The buffer shall be demarcated with painted orange lath or via the installation of orange construction fencing. Disturbance within the buffer shall be postponed until a qualified ornithologist has determined that the young have attained sufficient flight skills to leave the area or that the nesting cycle has otherwise completed.

Method of Monitoring: If construction/earthmoving activity is to occur between March 1st and September 1st the survey prepared by a qualified biologist shall be submitted to Planning Division staff 15 days prior to initiation of earth disturbing activities, vegetation clearing and/or construction activities.

Mitigation Measure BIO-3; Western Pond Turtle Pre-construction Protocol Surveys: Because there is potential for Western Pond Turtle to occur in the Study Area, preconstruction surveys would confirm presence/absence of these species at the time of the proposed construction and ensure no adverse effect to any encountered. The following measures are recommended to avoid or otherwise minimize potential impacts to this species.

1. A qualified biologist would perform a pre-construction survey for pond turtles within Arroyo Creek no more than 14 days prior to initiation of ground disturbing, vegetation removal or construction activities. The California Department of Fish and Wildlife will be contacted if pond turtles are found within the planned Study Area and will recommend appropriate mitigation measures to avoid adverse effects on the species.

Method of Monitoring: A minimum of 14 days prior to earth disturbing activities, vegetation clearing and/or construction activities the project applicant will provide to the Planning Division the survey results.

Mitigation Measure BIO-4; Riparian Zone Restoration Permitting: Prior to ground disturbing, vegetation removing or construction activities, the permittee shall first obtain all required permits from applicable resource agencies for restoration work along Arroyo Creek, including a Lake and Streambed Alteration Agreement (LSAA) from the California Department of Fish and Wildlife (CDFW), a 404 permit from the US Army Corps of Engineers (USACE), and a 401 water quality certification from the Regional Water Quality Control Board (RWQCB). All work performed shall be in conformance with CDFW, USACE, and RWQCB requirements. The applicant will demonstrate that work has been completed prior to issuance of a certificate of occupancy.

Method of Monitoring: Prior to issuance of a certificate of occupancy for any of the four (4) speculative warehouse/industrial facilities the applicant will provide to the Planning Division verification that all required permits from applicable resource agencies for restoration work along Arroyo Creek have been received and verification that the restoration work has been completed in compliance with approved restoration plans.

V. CULTURAL RESOURCES. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- c) Disturb any human remains, including those interred outside of dedicated cemeteries?

Discussion:

a/b. The area of the proposed development is previously disturbed and includes several dilapidated industrial structures and buildings. A determination of eligibility and effect of the project site was conducted by Peak & Associates, Inc and report prepared, dated May 11, 2022. The report indicated that there were no archaeological, prehistoric or historic-era archaeological sites found within the project site. The study included archival research of materials on file at the Northwest Information Center at Sonoma State University, contacting the Native American Heritage Commission and interested tribal representatives, and a field survey, including an examination of subsurface soils and a California Register of Historical Resources query in September 2021. The Native American Heritage Commission (NAHC) was requested to check the Sacred Lands files and provide a list of suitable contacts for further information on December 7, 2021 and responded on February 14, 2022 resulted in a positive finding. Peak & Associates contacted the Mishewal-Wappo Tribe of Alexander Valley regarding these findings and sent additional requests to individuals and groups regarding general information on the property. Letters requesting information on concerns within the APE were sent by email or, lacking an email address, by fax on April 13, 2022. Yvonne Perkins, THPO, Cultural Resources Chairman, Yocha Dehe Wintun Nation stated that the project is within the aboriginal territory of Yocha Dehe and, therefore, they wish to be updated as the project progresses.

There are three elements of the building complex: a 1953 industrial building, a 1980s industrial building, and a 1940s water tank. The buildings were associated with the building complex to the west through ownership by the same company, determined as not eligible by Sikes, and now removed for the construction of the Napa County Jail. There are no known events of historical significance that occurred at this site. The complex is not eligible for either the NRHP or the CRHR under Criterion A. Similarly, there are no particular individuals of importance associated with the Basalt Rock Company or the later Dillingham Company identified specifically as owners of the land and facilities in relationship to the buildings. The complex is not eligible for the NRHP or the CRHR under Criterion B. The industrial buildings are utilitarian in nature, with no particular design elements of note. The complex is not eligible for the NRHP or the CRHR under Criterion C. The industrial building complex is not eligible for either the NRHP or for the CRHR.

In addition, the Napa County Environmental Resource Maps (based on the following layers – Historical sites points & lines, Archaeology sites and flags) do not identify any historical or archaeological resources, sites or unique geological features on the project site. There is no information in the County’s files that would indicate that there is a potential for occurrence of these resources. It is therefore not anticipated that any cultural resources are present on the site, and the potential for impact is considered less-than-significant. However, if archaeological or cultural resources are found during grading of the project, construction of the project is required to cease, and a qualified archaeologist will be retained to investigate the site in accordance with the following standard condition of approval that will be imposed on the project:

7.2 ARCHEOLOGICAL FINDING

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

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

c. No human remains have been encountered on the property and no information has been encountered that would indicate that construction of this project would encounter human remains. However, if resources are found during project grading, construction of the project is required to cease, and a qualified archaeologist would be retained to investigate the site in accordance with standard condition of approval noted above. Impacts would be less than significant.

Mitigation Measures: None are required.

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

Discussion:

- a. The proposed project would comply with Title 24 energy use requirements and would not result in significant environmental impacts due to wasteful, inefficient or unnecessary consumption of energy resources during project construction or operation. The applicant has filled out the County's Voluntary Best Management Practices (BMP) Checklist for Development Projects Impacts and many of the BMPs include features which would reduce energy use at the site such as; solar ready roofs, energy efficient lighting systems, SRI 72 TPO 'cool roof', water efficient fixtures, water efficient landscaping and infrastructure to support EV charging stations. Impacts would be less than significant.
- b. The proposed project would not conflict with the provisions of a state or local plan for renewable energy or energy efficiency because there are no plans applicable to the subject site. No impacts would occur.

Mitigation Measures: None are required.

VII.	GEOLOGY AND SOILS. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
a)	Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i)	Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input 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 creating substantial direct or indirect risks to life or property? Expansive soil is defined as soil having an expansive index greater than 20, as determined in accordance with ASTM (American Society of Testing and Materials) D 4829. | <input type="checkbox"/> | <input type="checkbox"/> | <input 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. A geotechnical study, dated October 2019, was prepared by RGH consultants.
 - i.) There are no observable landforms on the site that would indicate the presence of active faults and the site is not within a current Alquist-Priolo Fault Zone. As such, the proposed project would result in a less than significant impact with regards to rupturing a known fault.
 - ii.) All areas of the Bay Area are subject to strong seismic ground shaking, as acknowledged in the RGH geotechnical study. Construction of the project would be required to comply with the latest building standards and codes, including the California Building Code (CBC) that would reduce any potential impacts to a less than significant level.
 - iii.) No subsurface conditions have been identified on the project site that indicated a susceptibility to seismic-related ground failure or liquefaction. Compliance with the latest edition of the California Building Code for seismic stability would result in less than significant impacts.
 - iv.) The Napa County GIS Sensitivity Maps (Landslides line and polygon) and published maps did not indicate the presence of landslides within the area proposed for development. Since the project is not proposed on steep slopes the potential that the project would directly or indirectly lead to landslides is less than significant.
- b. The proposed improvements would occur on slopes of five (5) percent or less. The project would require incorporation of best management practices (BMPs) and would be subject to the Napa County Stormwater Ordinance which addresses sediment and erosion control measures and dust control, as applicable. Grading and drainage plans would include BMPs for erosion prevention and sediment control, and protection fencing for waterways and/or sensitive areas. A tentative Stormwater Pollution Prevention Plan (SWPPP) has been submitted by the applicant and reviewed by the County's Engineering division and found to meet standards. The plan includes provisions for erosion and sediment controls, water quality monitoring, construction sediment and erosion control measures, maintenance responsibilities, and other storm water management controls. Other examples of BMPs typical of a SWPPP include covering soil stockpiles during construction and putting temporary barriers around storm-drain inlets. The permit applications must also demonstrate compliance with the National Pollutant Discharge Elimination System (NPDES) permit process provisions. Mandatory compliance with these permit requirements would reduce soil erosion and the potential for soil loss. Adherence to the requirements of the NPDES Permit, including installation of appropriate BMPs to control stormwater runoff would ensure proper management of loose and disturbed soil to prevent erosion and soil loss. Impacts would be less than significant.
- c/d. According to the Wetland & Biological Resources Assessment prepared for the project (Barnett, June 2022), the property is composed of Coombs gravelly loam, two (2) to five (5) percent slopes, Haire loam, two (2) to nine (9) percent slopes, Haire clay loam, 15 to 30 percent slopes and Hambrock rock-Outcrop Complex, 30 to 75 percent slope. Based on the Napa County GIS Sensitivity Maps (liquefaction layer) the property includes areas generally subject to very-low tendencies to liquefy. All proposed construction will be required to comply with all the latest building standards and codes at the time of construction. The CBC includes requirements, and the project's Geotechnical study included recommendations to address soil-related hazards, including testing to identify expansive soils and design specifications where structures are to be constructed on expansive soils. Typical measures to treat expansive soil conditions involve removal, proper fill selection, and compaction. In cases where soil remediation is not feasible, the CBC requires structural reinforcement of foundations to resist the forces of expansive soils. Mandatory compliance with the latest editions of the California Building Code for seismic stability would reduce any potential impacts to the maximum extent possible, resulting in less than significant impacts.
- e. A Wastewater Feasibility Report by RSA (June 2022) was prepared for the project. The project will connect to a new onsite advanced wastewater treatment system including an Orenco AdvanTex or HOOT treatment and dispersal field designed for each building of the proposed facility. Domestic wastewater from the proposed facilities will flow into new septic tanks. Wastewater will then flow into treatment tanks that allows recirculation. After treatment, wastewater will flow to dosing tanks, where it will be pumped to each proposed distribution field. The sizing of the tanks and the type of advanced treatment system will be determined as the actual program is refined throughout the

permitting process, however, preliminary evaluation from RSA+ confirms the soils on site are suitable for the required wastewater infrastructure. The impacts are considered less than significant. (see also **Section XIX Utilities and Service Systems (d)**, below.)

- f. No paleontological resources or unique geological features have been identified on the property. However, if resources are found during any earth disturbing activities associated with the project, construction of the project is required to cease, and a qualified archaeologist will be retained to investigate the site in accordance with the standard condition of approval 7.2 identified in **Section V** above.

Mitigation Measures: None are required.

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

Discussion:

On April 20, 2022, the BAAQMD adopted updated thresholds of significance for climate impacts (CEQA Thresholds for Evaluating the Significance of Climate Impacts, BAAQMD April 2022).² The updated thresholds to evaluate GHG and climate impacts from land use projects are qualitative and geared toward building and transportation projects. Per the BAAQMD, all other projects should be analyzed against either an adopted local Greenhouse Gas Reduction Strategy (i.e., Climate Action Plan (CAP)) or other threshold determined on a case-by-case basis by the Lead Agency. If a project is consistent with the State’s long-term climate goals of being carbon neutral by 2045, then a project would have a less-than-significant impact as endorsed by the California Supreme Court in *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 62 Cal. 4th 204). There is no proposed construction-related climate impact threshold at this time. Greenhouse gas (GHG) emissions from construction represent a very small portion of a project’s lifetime GHG emissions. The proposed thresholds for land use projects are designed to address operational GHG emissions which represent the vast majority of project GHG emissions.

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

In July 2015, the County re-commenced preparation of the CAP to: i) account for present day conditions and modeling assumptions (such as but not limited to methods, emission factors, and data sources), ii) address the concerns with the previous CAP effort as outlined above, iii) meet applicable State requirements, and iv) result in a functional and legally defensible CAP. On April 13, 2016, the County, as the part of the first phase of development and preparation of the CAP, released Final Technical Memorandum #1: 2014 Greenhouse Gas Emissions Inventory and Forecast, April 13, 2016. This initial phase included: i) updating the unincorporated County’s community-wide GHG emissions inventory to 2014, and ii) preparing new GHG emissions forecasts for the 2020, 2030, and 2050 horizons. On July 24, 2018, the County prepared a Notice of Preparation of a Draft Focused EIR for the Climate Action Plan. The review period was from July 24, 2018, through August 22, 2018. The Draft Focused EIR for the CAP was published May 9, 2019. Additional information on the County CAP can be obtained at the Napa County Department

² <https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines>, April 2022

of Planning, Building and Environmental Services or online at <https://www.countyofnapa.org/589/Planning-Building-Environmental-Services>. The County's draft CAP was placed on hold, when the Climate Action Committee (CAC) began meeting on regional GHG reduction strategies in 2019. The County is currently preparing an updated CAP to provide a clear framework to determine what land use actions will be necessary to meet the State's adopted GHG reduction goals, including a quantitative and measurable strategy for achieving net zero emissions by 2045.

Regarding operational emissions, as part of the statewide implementation of Senate Bill (SB) 743, the Governor's Office of Planning and Research (OPR) settled upon automobile vehicle miles of travel (VMT) as the preferred metric for assessing passenger vehicle-related impacts under CEQA and issued revised CEQA Guidelines in December 2018, along with a Technical Advisory on Evaluating Transportation Impacts in CEQA to assist practitioners in implementing the CEQA Guidelines revisions. The CEQA Guidelines and the OPR Technical Advisory concluded that, absent substantial evidence otherwise, the addition of 110 or fewer daily trips could be presumed to have a less than significant VMT impact.

The County maintains a set of Transportation Impact Study Guidelines (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 the County's current TIS Guidelines, a project is required to prepare a TIS if it generates 110 or more net new daily vehicle trips.

The TIS Guidelines also include VMT analysis requirements for projects based on trip generation, which includes a screening approach that provides a structure to determine what level of VMT analysis may be required for a given project. For a new project that would generate less than 110 net new daily vehicle and truck trips, not only is the project not required to prepare a TIS, it is also presumed to have a less-than-significant impact for VMT. However, applicants are encouraged to describe the measures they are taking and/or plan to take that would reduce the project's trip generation and/or VMT. Projects that generate more than 110 net new passenger vehicle trips must conduct a VMT analysis and identify feasible strategies to reduce the project's vehicular travel; if the feasible strategies would not reduce the project's VMT by at least 15%, the conclusion would be that the project would cause a significant environmental impact.

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

The County requires project applicants to consider methods to reduce GHG emissions consistent with Napa County General Plan Policy CON-65(e). Pursuant to State CEQA Guidelines Section 15183, this assessment focuses on impacts that are "peculiar to the project," rather than the cumulative impacts previously assessed, because this Initial Study assesses a project that is consistent with an adopted General Plan for which an EIR was prepared. GHGs are the atmospheric gases whose absorption of solar radiation is responsible for the greenhouse effect, including carbon dioxide (CO₂), methane, ozone, and the fluorocarbons, which contribute to climate change. CO₂ is the principal GHG emitted by human activities, and its concentration in the atmosphere is most affected by human activity. It also serves as the reference gas to which to compare other GHGs. For the purposes of this analysis potential GHG emissions associated with winery 'construction' and 'development' and with 'ongoing' winery operations have been discussed.

GHG emissions from construction represent a very small portion of a project's lifetime GHG emissions. The BAAQMD recommended thresholds do not include a construction-related climate impact threshold at this time. One time "Construction Emissions" associated with the project include: emissions associated with the energy used to develop and prepare the project area, construction, and construction equipment, and worker vehicle trips (hereinafter referred to as Equipment Emissions). The physical improvements associated with this project include the construction of an approximately 697,000 sq. ft. warehouse/industrial facility comprised of four speculative buildings and associated infrastructure. As discussed in Section III. Air Quality, construction emissions would have a temporary effect and BAAQMD recommends incorporating feasible control measures as a means of addressing construction impacts. If the proposed project adheres to relevant best management practices identified by the BAAQMD and the County's standard conditions of project approval, construction-related impacts are considered less than significant. See Section III. Air Quality for additional information.

In 2011, the Bay Area Air Quality Management District (BAAQMD) released California Environmental Quality Act (CEQA) Project Screening Criteria and Significance of Thresholds [1,100 metric tons per year (MT) of carbon dioxide and carbon dioxide equivalents (CO₂e)]. This threshold of significance is appropriate for evaluating projects in Napa County. During the ongoing planning effort, the County requires project applicants to consider methods to reduce GHG emissions consistent with Napa County General Plan Policy CON-65(e). (Note:

Pursuant to State CEQA Guidelines Section 15183, because this initial study assesses a project that is consistent with an adopted General Plan for which an environmental impact report (EIR) was prepared, it appropriately focuses on impacts which are “peculiar to the project,” rather than the cumulative impacts previously assessed.)

GHGs are the atmospheric gases whose absorption of solar radiation is responsible for the greenhouse effect, including carbon dioxide, methane, ozone, and the fluorocarbons, that contribute to climate change (a widely accepted theory/science explain human effects on the atmosphere). Carbon Dioxide (CO₂) gas, the principal greenhouse gas (GHG) being emitted by human activities, and whose concentration in the atmosphere is most affected by human activity, also serves as the reference gas to compare other greenhouse gases. Agricultural sources of carbon emissions include forest clearing, land-use changes, biomass burning, and farm equipment and management activity emissions (http://www.climatechange.ca.gov/glossary/letter_c.html). Equivalent Carbon Dioxide (CO₂e) is the most commonly reported type of GHG emission and a way to get one number that approximates total emissions from all the different gasses that contribute to GHG (BAAMD CEQA Air Quality Guidelines, May 2017). In this case, carbon dioxide (CO₂) is used as the reference atom/compound to obtain atmospheric carbon CO₂ effects of GHG. Carbon stocks are converted to carbon dioxide equivalents (CO₂e) by multiplying the carbon total by 44/12 (or 3.67), which is the ratio of the atomic mass of a carbon dioxide molecule to the atomic mass of a carbon atom (<http://www.nciasi2.org/COLE/index.html>).

Construction and operational emissions were estimated in the Air Quality Report (GHD 2022). In order to assess the potential impact of construction generated emissions, the construction GHG emissions are annualized over an assumed 30-year project lifespan, added to operational emissions, and compared against a threshold of 1,100 MTCO₂e. The Project’s construction-generated greenhouse gas emissions of 1,203 MTCO₂e annualized over 30 years would equal 40.11 MTCO₂e per year.

As shown in Table 14 of the Air Quality Report, the Project would exceed the Sacramento Metropolitan Air Quality Management District’s³ (SMAQMD) recommended threshold of significance for greenhouse gas impacts, and mitigation is required to reduce the impact to less than significant. The SMAQMD identifies recommended “Tier 2 Best Management Practices (BMP 3)” to reduce a Project’s operational greenhouse impact if the threshold of significance is exceeded.

If a project achieves BMP 3, then the operational impact is considered less than significant, and no additional analysis is required. Projects that do not meet the BMP 3 are required to implement additional measures. BMP 3 consists of reductions in vehicle miles traveled (VMT) that are based on adopted SB 743 targets and includes quantifiable VMT reduction targets for residential, office, and retail projects.

BMP 3 does not include industrial land uses. SMAQMD’s guidance provides that a project that meets the de minimis criteria for VMT in the Office of Planning and Research’s (OPR) SB 743 Technical Advisory on Evaluating Transportation Impacts in CEQA, must document the qualifying criteria to satisfy the BMP 3 requirement.

The Project’s VMT was analyzed in the Traffic Impact Analysis (TIA) Report prepared by W-Trans determined that the Project would achieve a 6.4 percent of the 15 percent SB 743-informed reduction target. Per the Project TIA, additional reductions totaling 8.6 percent would need to be achieved through implementation of Transportation Demand Management (TDM) strategies aimed at reducing the project’s automobile VMT.

The TIA identified TDMs that achieve an 11 percent reduction in operational VMT. Implementation of the TDMs would result in the Project achieving the SB 743 VMT target reduction of 15 percent. The Department of Public Works has included TDM plan requirements in their Conditions of Approval for the project and thus it can be expected that the project would have a less-than-significant impact for greenhouse gas emissions.

- b. CARB 2017 Climate Change Scoping Plan provides California’s climate policy portfolio and recommended strategies to put the State on a pathway to achieve the 2030 target. The scenario includes ongoing and statutorily required programs, continuing the Cap-and-Trade Program, and high-level objectives and goals to reduce GHGs across multiple economic sectors. Existing programs, also known as “known commitments,” identified by the 2017 Climate Change Scoping Plan include:

SB 350, the Low Carbon Fuel Standard, CARB’s Mobile Source Strategy, SB 1383 for short-lived climate pollutants and California’s Sustainable Freight Action Plan. The high-level objective and goals recommendations cover the energy, transportation, industry, water, waste management, agriculture, and natural and working lands, and are to be implemented by a variety of State agencies.

The Project was analyzed for consistency with the 2017 CARB Climate Change Scoping Plan and determined to not result in a significant

³ GHD’s Air Quality and Greenhouse Gas Report selected SMAQMD for Greenhouse Gas threshold’s based on a review of potential sources for threshold of significance considering that the BAAQMD recommends against their own adopted thresholds when the agency is “faced with a unique or unusual project for which the analysis supporting the thresholds as described in this report do not squarely apply.”

impact. GHD provided analysis and responses to the scoping plan reduction measures and concluded that the project was consistent with those measures that are applicable to the project. The impact is considered less than significant.

Mitigation Measures: None are required.

IX.	HAZARDS AND HAZARDOUS MATERIALS. Would the project	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
	a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	b) Create a significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>
	f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wild-land fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion:

- a. The proposed project will not involve the transport of hazardous materials other than those amounts normally used in construction of the facility. The project proposes to construct four (4) warehouse/industrial type buildings totaling 697,000 sq. ft. Tenants at this time are unknown but future tenants would need to comply with allowable land uses for the Industrial zoning district designation. With approval of a Use Permit, Industry is an allowed land use in the Industrial zoning district. Industry is defined under Napa County Code 18.08.330 as “the processing of materials or fabricating of articles, including research, manufacturing and refining, and the packaging, treatment, assembly and storage of goods, materials, liquids and equipment in connection therewith. It includes sales of items produced on the premises”. Tenancy change within the project is required under Conditions of Approval to receive administrative review and approval by the PBES Department, and the written profile requires the applicant to disclose if any hazardous materials will be maintained onsite. A Business Plan will be filed with the Environmental Health Division should the number of hazardous materials reach reportable levels. However, in the event that the proposed use or a future use involves the use, storage or transportation of greater the 55 gallons or 500 pounds of hazardous materials, a use permit modification and subsequent environmental assessment would be required in accordance with the Napa County Zoning Ordinance prior to the establishment of the use. During construction of the project some hazardous materials, such as building coatings/ adhesives/ etc., will be utilized. However, given the quantities of hazardous materials and the limited duration of construction activity, they will result in a less-than-significant impact. Furthermore, consistent with operations permits for warehouse facilities, the materials transported by delivery trucks do not rise to significant thresholds, and the impact is considered less than significant.
- b. The proposed project consists of the construction of four (4) warehouse/industrial type buildings totaling 697,000 sq. ft. in size. Hazardous materials such as diesel, maintenance fluids, and paints would be used onsite during construction. Should they be stored onsite, these materials would be stored in secure locations to reduce the potential for upset or accident conditions.

The site has been utilized for industrial types uses since around the 1950's when Basalt Rock Company Inc., expanded its operation and built the existing 100,000 sq. ft. existing main building for the manufacture of precast concrete wall panels. The property has changed hands since and industrial operations have continued. Because of the history of use on the site, a Phase I Environmental Site Assessment (ESA) was completed in July 2021 by Avocet Environmental to evaluate the history and current condition of the site and surrounding properties in the context of the use, storage, handling, and disposal of potentially hazardous chemicals or wastes that could have adversely impacts the underlying soil and groundwater. Based on the site's history and current condition, the possible existence of "Recognized Environmental Conditions" (RECs), "Controlled RECs" (CREC), and "Historical RECs" (HREC), as defined in ASTM (American Society for Testing and Materials) Standard E1527-13 (ASTM, 2013), and "other environmental features" (OEFs) were evaluated. Avocet's ESA identified two (2) RECs which are defined as "the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment". These two (2) RECs included three oil-stained pad-mounted electrical transformers in a fenced enclosure outside the northeast corner of the Watershed building and sitewide use of petroleum, oil and lubricants (POLs). ESA indicates that these RECs can be considered *De minimis* or "a condition that generally does not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies."

The ESA also identified six OEFs at the project site. OEFs are potential environmental features or conditions that do not meet the ASTM definition of a REC, CREC, or HREC but which may warrant mention in the context of acquiring and redeveloping the site. The six OEFs included; (1) Abandoned above ground storage tanks (ASTs), (2) Other Oil-Filled Electrical Transformers, (3) asbestos-containing materials (ACMs) and lead-bearing paint and coatings (LBPs), (4) Water Wells, (5) Solid Waste Disposal Areas, and (6) Septic Systems.

Finally, as part of the ESA, Avocet evaluated the potential presence of vapor intrusion conditions (VICs) and/or vapor encroachment conditions (VECs) at the subject site. A VIC can occur if VOCs are present in the vadose zone or in groundwater beneath a property at concentrations such that vapor could intrude into, and accumulate in, overlying structures at concentrations potentially hazardous to human health. A VEC can occur if VOCs from an offsite source migrate beneath a property in the vapor phase.

Based on their Phase I investigations Avocet provided a number of recommendations regarding Phase II investigations and site clearance, which have been incorporated into Mitigations Measures or Conditions of Approval on the project. **Mitigation Measure HHM-1** which requires a pre-demolition survey for asbestos-containing material (ACM) and lead-bearing paint and coatings (LBP) and other potentially hazardous building materials for the demolition of the existing building structures and abatement of identified hazardous materials prior to issuance of a demolition permit. A recommendation that the applicant conduct additional ambient air and soil vapor samples and submit a report verifying whether there is a risk to future commercial building tenants and recommendations on further mitigation and actions if necessary, has been incorporated as a Condition of Approval by the Environmental Health division who is currently conducting oversight on remediation efforts on the project site. Other recommendations concerning the removal of ASTs and inactive wells will be handled through demolition permits and receive the appropriate regulatory agency oversight.

In May 2020, County Code Enforcement, responding to a complaint, identified significant grading had taken place within the Arroyo Creek setback. An enforcement case was opened (CE20-00098) to restore and correct the illegal grading and later site visits also identified two solid waste disposal sites on the project parcel from prior tenants. Notices of violation were issued to the property owners. The illegal grading has since been remediated to the satisfaction of the County Engineering Division. As of the preparation of this Initial Study the applicant continues to work with the Local Enforcement Agency (LEA; Napa County Environmental Health Division) to remediate the two solid waste disposal sites. Subsurface combustible gas monitoring has proceeded for the two disposal sites, with no significant methane gas detections to date. In November 2023, Avocet Environmental, on behalf of the applicant, completed a Conceptual Final Closure Plan for the two disposal sites. The conceptual plan has been reviewed by the LEA in coordination with CalRecycle and the San Francisco Regional Water Quality Control Board, who concur with the concepts and remediation steps. The applicant has been invited to prepare the Post Closure Land Use (PLCU) plan for the two disposal sites and a Health and Safety Plan for the potential landfill gas exposure. Because the applicant proposes to construct buildings within 1,000 feet of the solid waste disposal sites, a PLCU plan will also be required for the buildings/site which demonstrates that they meet the requirements of the California Code of Regulations. Title 27, § 21190 which includes, among other things, that the buildings meet requirements for methane protection. An approved PCLU plan is conditioned by the County Environmental Health division prior to the issuance of any demolition, grading or construction permits.

On January 2022, a Revised Work Plan for Waste Characterization and Management was submitted by Avocet Environmental to the LEA. The work plan covered the planned methods of characterization, consolidation and management of the northern and southern disposal sites. The work plan covers much of the investigation and current remediation work that has taken place since the Notice of Violation and this Initial Study was prepared. The report acknowledges that after investigations have been reported and final closure of the disposal sites is completed that the applicant will proceed with clearing the site of the existing buildings and improvements and begin redeveloping the

site for the proposed warehouse/industrial facility. Due to prior uses of the site, the redevelopment grading process could also expose near-surface soil contamination, such as in areas where tenants may have stored and used oil and/or other potentially hazardous substances. Suspected soil contamination, if any, will be investigated by sampling and analysis, and soil confirmed as being contaminated will be removed, temporarily stockpiled, and then transported offsite for disposal or to be recycled as appropriate. Avocet recommends, and this Initial Study incorporates as **Mitigation Measure HHM-2**, that detailed procedures or identifying, segregating, stockpiling, and characterizing soil suspected of being contaminated during site grading be included in a Soil Management Plan (SMP). The SMP will also include conservative screening levels for use in determining whether impacted soil, if encountered, can be reused onsite or must be transported offsite or disposal or to be recycled. With an approved SMP, the potential release of hazardous materials into the environment due to grading would be maintained at a less than significant level.

With inclusion of these mitigation measures and conditions of approval from the Division of Environmental Health hazards to the public and environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials should be kept to a less than significant level.

- c. There are no schools located within one-quarter mile from the project site. The nearest school, Napa Valley College, is approximately .3 miles (1,650 feet) to the southwest of the project site. The impact would be considered less than significant, and no mitigation is required.
- d. No impact would occur as the project site is not on the Cortese list or any of the lists of hazardous waste sites enumerated under Government Code Section 65962.5.
- e. The project site is located approximately three miles to the north of the Napa County Airport and is therefore not subject to the requirements of the County's Airport Compatibility Combination zoning district and the requirements of the Napa County Airport Land Use Compatibility Plan (ALUCP). The project site is not located within any of the compatibility plan zones for noise levels and low overflights.
- f. The proposed project has three driveways that serve the site that have been designed to comply with County standards and access to the buildings has been designed to accommodate fire apparatus and large trucks. The project has been reviewed by the County Fire Department, Engineering Services Division and the Department of Public Works and found acceptable as conditioned. Therefore, the design of the project will not negatively impact or hinder emergency vehicle access.
- g. The project would not increase exposure of people and/or structures to a significant loss, injury or death involving wild land fires. The project would comply with current California Department of Forestry and California Building Code requirements for fire safety. The project is located in a moderate Fire Hazard Severity Zone within the State Responsibility Area. Impacts would be less than significant.

Mitigation Measure HHM-1: Building Pre-Demolition Surveys. Pre-demolition surveys shall be conducted for ACM's (asbestos-containing material), LBP (lead-bearing paint and coatings), and other potentially hazardous building materials, including "universal wastes". A report shall be submitted to the PBES Planning and Building divisions identifying any of these hazardous materials exist on site, verifying whether they have been removed properly prior to demolition and/or providing best management practices for their abatement prior to issuance of a demolition permit associated with this project.

Method of Monitoring: The pre-demolition survey report will be submitted to the PBES Planning and Building division prior to the issuance of any demolition permit.

Mitigation Measure HHM-2: Soil Management Plan. Prior to issuance of grading permits associated with this project, a qualified professional will prepare a Soils Management Plan (SMP), as detailed in Avocet Environmental's Revised Work Plan for Waste Characterization and Management dated January 4, 2022, and submit the SMP to the PBES Planning and Environmental Health divisions for review and approval. The SMP will include procedures for identifying, segregating, stockpiling, and characterizing soil suspected of being contaminated. The SMP will also include conservative screening levels for use in determining whether impacted soil, if encountered, can be reused onsite or must be transported offsite or disposal or to be recycled. A copy of this report will be kept onsite by the grading contractor during clearing and grading of the site in preparation of redevelopment. The permittee will acknowledge that the grading contractor has been trained on the procedures contained in this report.

Method of Monitoring: The SMP will be submitted to the PBES Planning and Environmental Health divisions for review and approval prior to the issuance of any grading permit.

X.	HYDROLOGY AND WATER QUALITY. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
	a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>
	c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces which would:				
	i) result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

The County requires all discretionary permit applications (such as use permits and ECPAs) to complete necessary water analyses in order to document that sufficient water supplies are available for the proposed project and to implement water saving measures to prepare for periods of limited water supply and to conserve limited groundwater resources.

On June 7, 2022, the Napa County Board of Supervisors provided interim procedures to implement provisions of the Napa County Groundwater Sustainability Plan (GSP) for issuance of new, altered or replacement well permits and discretionary projects that would increase groundwater use. The direction limits a parcel's groundwater allocation to 0.3- acre feet per acre per year, or no net increase in groundwater use if that threshold is exceeded already for parcels located in the GSA Subbasin. For parcels not located in the GSA Subbasin (i.e., generally located in the hillsides), a parcel-specific Water Availability Analysis would suffice to assess potential impacts on groundwater supplies. While the project parcel is located within the Napa County Groundwater Deficient Area (MST), water will be supplied from groundwater wells within the GSA Subbasin.

To assess potential impacts resulting from project well(s) interference with neighboring wells within 500 feet and/or springs within 1,500 feet, the County's WAA guidance⁴ requires applicants to perform a Tier 2 analysis where the proposed project would result in an increase in groundwater extraction from project well(s) compared to existing levels.

To assess the potential impacts of groundwater pumping on hydrologically connected navigable waterways and those non-navigable tributaries connected to navigable waters, the County's WAA guidance requires applicants to perform a Tier 3 or equivalent analysis for new or replacement

⁴ The County's Water Availability Guidelines (adopted May 2015)

wells, or discretionary projects that would rely on groundwater from existing or proposed wells that are located within 1,500 feet of designated "Significant Streams."⁵

Public Trust: The public trust doctrine requires the state and its legal subdivisions to "consider," give "due regard," and "take the public trust into account" when considering actions that may adversely affect a navigable waterway. (Environmental Law Foundation v. State Water Resources Control Bd.; San Francisco Baykeeper, Inc. v. State Lands Com.) There is no "procedural matrix" governing how an agency should consider public trust uses. (Citizens for East Shore Parks v. State Lands Com.) Rather, the level of analysis "begins and ends with whether the challenged activity harms a navigable waterway and thereby violates the public trust." (Environmental Law Foundation, 26 Cal.App.5th at p. 403.) As demonstrated in the Environmental Law Foundation vs State Water Resources Control Board Third District Appellate Court Case, that arose in the context of a lawsuit over Siskiyou County's obligation in administering groundwater well permits and management program with respect to Scott River, a navigable waterway (considered a public trust resource), the court affirmed that the public trust doctrine is relevant to extractions of groundwater that adversely impact a navigable waterway and that Counties are obligated to consider the doctrine, irrespective of the enactment of the Sustainable Groundwater Management Act (SGMA).

On January 10, 2024, Napa County released the Interim Napa County Well Permit Standards and WAA Requirements - January 2024, providing guidance to complying with the Public Trust.

- a. The Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. A Wastewater Feasibility Report was prepared by RSA+ (June 2022). The proposed project would demolish the existing septic system on the site and build a new septic system for each of the four proposed buildings. Domestic wastewater from the proposed warehouse facilities will flow into new septic tanks. Wastewater will then flow into treatment tanks that allows recirculation. After treatment, wastewater will flow to dosing tanks, where it will be pumped to each proposed distribution field. The Wastewater Feasibility Report includes calculations for each of the proposed buildings and the number of estimated employees based upon the California Plumbing Code. The Division of Environmental Health reviewed this report and concurred with its findings, conditioned that the plans shall be designed by a licensed Civil Engineer or Registered Environmental Health Specialist and approved by the Division of Environmental Health. Impacts would be less than significant.
- b. The Project is located on a 55.27-acre parcel in the County's Milliken-Sarco-Tulocay (MST) Groundwater Deficient Area, but receives water through a 1986 Water Agreement from a well located approximately .65 miles southeast at Latour Court (APN 046-600-017) which is located outside of the MST Groundwater Deficient Area but within the Napa County's GSA Subbasin. A Water Rights and Groundwater Resources Review was prepared by Wagner & Bonsignore (October 2019). According to the review the agreement provides the subject property with non-exclusive rights to draw water from a well located on Latour Ct. The applicant has also submitted an addendum letter (April 2024) to their Water Availability Analysis (July 2023) which details the contiguous parcel history concerning the 1986 water agreement and existing users for the Latour court well. Because the applicant has been able to demonstrate that the project parcel has an existing agreement to use the Latour Court well and that the project parcel had contiguous ownership at the time of the 1986 Water Agreement, the project is assumed to be subject to the .3 af/yr or no net increase groundwater use criteria for projects within the GSA Subbasin. There is a well on the property that is described as the 'Sandplant Well', which is currently supplying water to quarry activities on an adjacent parcel. The WAA identified two (2) other wells on the property that are marked as abandoned. The applicant does not anticipate regularly using on-site water for any purpose with exception of a single fill of the planned fire water storage tank (estimated between 500,000 and 750,000 gallons) and potentially as a backup source during emergencies. This tank will be filled from the onsite Sandplant Well currently serving the Syar Sandplant and quarry operations. This small volume is not anticipated to significantly impact Syar's annual groundwater usage or Syar's allotment agreement with the County of Napa. All potable and process water for the proposed project will be supplied from the Latour Court well.

Existing primary uses on the site include fabrication and storage of rebar and other steel products and it is estimated that there are less than 10 employees on the site at any one time. In the Water Availability Analysis this existing use is estimated to equal approximately five (5) af/yr of groundwater use from the Latour Court well. GHD then provides an analysis of the potential groundwater use of the site at a hypothetical build out, where each of the four (4) warehouse/industrial buildings have between 60 – 70 office/warehouse employees, a winery with approximately 370,000 gallons per year is operating and the project landscaping is installed. The resulting water usage from this hypothetical build out equals 16.58 af/yr of groundwater. As mentioned, this analysis is hypothetical and meant to demonstrate what a potential build out of the project could look like operating within the allowable groundwater allotment of the GSA (16.58 af/yr is exactly the total allotment of groundwater for a 55.27-acre parcel). The nature of the development at this time is speculative and no tenants have been identified, future tenant activities will need to fall under the County's definition of Industry which is defined as 'the processing of materials or fabricating of articles, including research, manufacturing and refining, and the packaging, treatment, assembly and storage of goods,

⁵ Refer to Figure 1: Significant Streams for Tier 3, located at www.countyofnapa.org/3074/Groundwater-Sustainability. The "Significant_Streams" and "Significant_Streams_1500ft_buffer" GIS layers are published as publicly-available open data through the County's ArcGIS Online Account.

materials, liquids and equipment in connection therewith. It includes sales of items produced on the premises'. Like other speculative warehouse/industrial developments in Napa County, the applicant's Use Permit will be conditioned to require administrative review and approval by the PBES department prior to change in tenancy. The Permittee will be required to provide the PBES department with a written profile of the proposed tenant, including name, present address, phone number, description of proposed use, employees, a list of any hazardous materials, other relevant material and an analysis to demonstrate that the proposed tenant will not cumulative increase annual groundwater use beyond the GSA groundwater criteria limit of 16.58 af/yr. The connection will require a meter and meter reading will need to begin in the event that tenancy of the project is estimated to exceed 90 percent of the 16.58 af/yr limit.

The applicant has been able to demonstrate that the project can operate within the groundwater use criteria for the project well. GHD estimates that considering the historical use of the of the Latour Court well they anticipate no well capacity issues in supporting the proposed maximum anticipated water demand for the Project. No known wells are within 500 feet and no known springs are within 1,500 feet of the Latour court well, so no Tier 2 analysis is required. The Latour court well is not within 1,500 feet of a significant stream so no Tier 3 analysis or analysis of Public Trust Resources review is required. With the County's Conditions of Approval on the project requiring administrative approval of tenant changes and meter reading should tenancy water use begin to exceed 90% of the total groundwater allotment Impacts to groundwater supplies would be expected to be less than significant.

- c. The project would not substantially alter the drainage pattern on site or cause a significant increase in erosion or siltation on or off the project site. Improvement plans prepared prior to the issuance of a building permit would ensure that the proposed project does not increase runoff flow rate or volume as a result of project implementation. General Plan Policy CON-50 (c) requires discretionary projects, including this project, to meet performance standards designed to ensure peak runoff in 2-, 10-, 50-, and 100-year events following development is not greater than predevelopment conditions. The preliminary Stormwater Control Plan has been reviewed by the Engineering Division. The proposed project would implement standard stormwater quality treatment controls to treat runoff prior to discharge from the project site. The incorporation of these features into the project would ensure that the proposed project would not create substantial sources of polluted runoff. In addition, the proposed project does not have any unusual characteristics that create sources of pollution that would degrade water quality. Impacts would be less than significant.
- d. The site lies outside the boundaries of the 100- and 500-year flood hazard boundaries. The parcel is not located in an area that is subject to inundation by tsunamis, seiches, or mudflows. No impact would occur.
- e. As discussed above, while the project parcel is located within the County's MST groundwater deficient area, the project well is located outside of this area within the boundaries of the GSA. The applicant has provided a Water Availability Analysis that demonstrates that although the operational changes would increase water use, the levels are below the groundwater use criteria based for a 55.27-acre parcel. The project would not result in an impact to water use and would therefore comply with the GSP. Water quality would be maintained through standard stormwater quality treatment control measures and compliance with Engineering Division Conditions of Approval. No impacts would occur.

Mitigation Measures: None required.

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

Discussion:

- a/b. The proposed project would not occur within an established community, nor would it result in the division of an established community. The proposed project complies with the Napa County General Plan, the Napa County Zoning Ordinance, applicable County Code sections, and all other applicable regulations.

Mitigation Measures: None required.

XII.	MINERAL RESOURCES. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
	a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion:

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

Mitigation Measures: None required.

XIII.	NOISE. Would the project result in:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
	a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

a/b. The proposed project will result in a temporary increase in noise levels during the construction of the facility and associated improvements. Construction activities will be limited to 7am-7pm on weekdays using properly muffled vehicles. The proposed project would not result in long-term significant permanent construction noise impacts. All construction activities will be conducted in compliance with the Napa County Noise Ordinance (N.C.C. Chapter 8.16). The anticipated level of noise to occur following the completion of construction including the operation of the facility would be typical of a light industrial or manufacturing use in an existing industrial park. The project is located within an area of existing industrial uses and is not in an area where noise increases resulting from additional industrial development will impact sensitive receptors. Residential units associated with the Napa State Hospital are located approximately 500+ feet to the north of the proposed project. The project has also been designed so that commercial truck loading docks are within the interior area of the four

buildings, which will result in damping noise to adjacent uses from trucks idling. Noise generated during this time is not anticipated to be significant and would not result in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. The design of the proposed project, together with adherence to the County Noise Ordinance, would ensure the proposed project would not result in adverse noise impacts.

- c. The proposed development is not located within the vicinity or Compatibility Zones of the Napa County Airport. As such, persons on the project site will not be exposed to noise from regular aircraft overflight. Furthermore, the nature of the uses allowed in the Industrial (I) zoning is not sensitive to increased noise levels from aircraft, and is considered compatible with aircraft operations. No impacts would occur.

Mitigation Measures: None required.

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

Discussion:

- a. The Association of Bay Area Governments' *Plan Bay Area 2050 Growth Pattern* figures indicate that the total households for Napa County are projected to increase some 10% by the year 2050, increasing from 50,000 to 56,000. Unincorporated Napa county, along with the cities of American Canyon, Napa, St. Helena, Calistoga and the town of Yountville all have existing compliant 6th Cycle Housing Elements certified by the State Department of Housing and Community Development. For the 6th Cycle, which runs from 2023 – 2031, Napa county jurisdictions have identified and have rezoned or are in the process of rezoning land to accommodate 3,844 dwelling units, more than half of the households projected by ABAG to develop in Napa county by 2050. In addition, the project would be subject to the County's housing impact mitigation fee, which provides funding to meet local housing needs.

Cumulative impacts related to population and housing balance were identified in the 2008 General Plan EIR. As set forth in Government Code §65580, the County of Napa must facilitate the improvement and development of housing to make adequate provision for the housing needs of all economic segments of the community. Similarly, CEQA recognizes the importance of balancing the prevention of environment damage with the provision of a "decent home and satisfying living environment for every Californian." (See Public Resources Code §21000(g).) The 2008 General Plan sets forth the County's long-range plan for meeting regional housing needs, during the present and future housing cycles, while balancing environmental, economic, and fiscal factors and community goals. The policies and programs identified in the additional iterations of the General Plan Housing Element function, in combination with the County's housing impact mitigation fee, to ensure adequate cumulative volume and diversity of housing. Impacts on the local and regional population and housing balance would be less than significant.

The project site is located on a developed industrial area with frontage to a nearby existing County maintained roadway. The project includes onsite water and sewer infrastructure and does not require connections to City or County services. No new infrastructure is proposed that might induce growth by extending service outside of the boundaries of the project site.

- b. No existing housing or people would be displaced as a result of the project. Therefore, the project would not displace substantial numbers of existing housing or numbers of people necessitating the construction of replacement housing elsewhere and no impact would occur.

Mitigation Measures: None required.

XV.	PUBLIC SERVICES. Would the project result in:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
	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 checked="" type="checkbox"/>	<input type="checkbox"/>
	iv) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	v) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion:

a. Public services are currently provided to the project area and the additional demand placed on existing services as a result of the proposed project would be minimal. The property is located within the service areas of both the Napa County Sheriff's Department and the Napa County Fire Department. The proposed improvements, if approved, would be inspected by County building inspectors and fire officials in order to ensure that construction occurs in accordance with current Building and Fire Codes applicable at the time of submittal of any requisite building permit application. The proposed project does not include construction of any new residential units nor accompanying introduction of new residents that would utilize existing parks or potentially increase student enrollment in schools located in the area of the project site. School impact fees, which assist local school districts with capacity building measures, would be levied pursuant to building permit submittal. No new parks or other public recreational amenities or institutions are proposed to be built with the proposed use permit. The proposed project will have a less than significant impact on public services.

Mitigation Measures: None are required.

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

Discussion:

a/b. The proposed project is a request to construct a new speculative warehouse/industrial facility and various other site improvements. The proposed project includes no new residential units nor accompanying introduction of new residents that would utilize existing parks in the area, potentially accelerating those recreational facilities' deterioration. The proposal would include new employees at the facility, some of whom might visit recreational facilities in the area during breaks, before or after work, or on the way to or from other destinations. However, given that the purpose of employees' trips are to and from the facility as the primary destination, such visits to area recreational facilities are anticipated to be infrequent and would not drastically accelerate the deterioration of any park amenities. No new parks or other public recreational amenities are proposed to be built with the proposed facility.

Mitigation Measures: None required.

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

Discussion:

The applicant contracted with W-Trans transportation planning engineers to prepare a Transportation Impact Study. W-Trans conducted traffic counts in 2020 and prepared a final traffic analysis report in March 2022. The W-Trans report evaluated existing and future traffic conditions and conducted analysis (including turning movements and traffic volume) for seven identified intersections including major intersections along SR 121 (Soscol Avenue/Silverado Trail), all the SR 29/SR 121 intersections at Imola Avenue, the SR 29/SR-12-121 intersection, and SR 221 at Basalt Road and at Soscol Ferry Road (SR 29). An Addendum to the Transportation Impact Study concerning Left-Turn Lane Warrants and Emergency Access was prepared on June 22, 2023.

- a. Although there is no public transit on Basalt Road, there is currently bus service along State Route 221, with a bus stop on the east side of State Route 221 at the Napa Community College approximately ¼ of mile to the northwest, and along Kaiser Road approximately ½ mile to southwest of the project site. There are no Class I bicycle paths within the project vicinity. The River to Ridge trailhead is just north of the project site and extends west towards the Napa Valley Vine Trail and Bay Area Trail. The project includes 16 total bicycle parking spaces. Although there are no public transit, bicycle, or pedestrian facilities nearby the project site, the proposed project does not conflict with any program, plan, ordinance or policy addressing the circulation system, therefore, the impact is considered less than significant, and no mitigation is required.
- b. The proposed project is anticipated to generate 2,329 total weekday trips. A portion of these trips will be made by heavy vehicles which are not subject to a VMT analysis. Based on data contained in the *Trip Generation Manual*, 10th Edition Supplement, ITE 2000, approximately 15 percent of daily trips for industrial park land uses are considered truck tips. The remaining 85 percent of the project daily

trips, or 1,980 trips, are estimated to be made by automobiles. W-Trans then multiplied these daily trips by the average trip length (11.8 miles for unincorporated Napa County) to derive the project's unmitigated VMT estimate of 23,364 miles. W-Trans based their baseline VMT analysis using 45 employees on the property in the recent past. In reviewing trip generation data available from ITE, it was determined that "Light Industrial" trip generation rates based on the number of employees were most appropriate for the application, since this small number of employees is well outside the range included in the ITE rates for the industrial park land use. Using these rates, a total of 137 daily trips are estimated to be associated baseline site uses. According to ITE data, approximately 92 percent of these light industrial trips would be made by automobiles, or approximately 126 daily trips. Multiplying these 126 daily auto trips by the 11.8-mile trip length figure, the VMT results for the proposed project is assumed to be 1,487 miles for recent uses of the site.

A project's effects on Vehicle Miles Traveled (VMT) is used as the basis for determining California Environmental Quality Act (CEQA) impacts with respect to transportation and traffic. At the time the TIS analysis was prepared the County of Napa had not yet formally adopted thresholds of significance related to VMT, though County PBES staff provided guidance based on a working draft document and Policy CIR-7 of the County's General Plan which indicates that development projects are expected to reduce unmitigated VMT by 15 percent or more. The existing 1,487 miles allocated to the project site represents 6.4 percent of the total 15 percent reduction threshold.

The County of Napa intends to maintain consistency with the Technical Advisory in basing transportation related VMT impacts on travel associated with automobiles, excluding travel generated by heavy trucks. The County also expects VMT impacts be compared to the baseline condition, wherein the assessment takes into consideration the VMT that is already generated by existing or recent development on a project site. Based on this guidance, W-Trans applied the following significant threshold: *A project that does not reduce its unmitigated automobile VMT by 15 or more percent, after taking into consideration proposed VMT reduction measures and automobile VMT generated by existing or recent uses, would cause a significant VMT impact.*

As the proposed project has an unmitigated VMT allocation of 23,364 miles for automobile uses, and a current allotment of 1,487 miles (or 6.4%), W-Trans assumed that additional reductions totaling 8.6 percent would need to be achieved through implementation of a Transportation Demand Management plan. W-Trans TIS outlined a number of ridesharing programs, education, outreach and marketing that based on the California Air Pollution Officers Association's *Handbook for Analyzing Greenhouse Gas Emission Reductions* (CAPCOA 2021) and the Napa County Department of Public Works has included the TDM program as a requirement in their Conditions of Approval for the project. For these reasons the project would not be expected to conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b) and impacts would be less than significant.

- c/d. The project site includes three proposed curb cut/driveway approaches for ingress/egress off Basalt Road on the south side of the project site. The westernmost project driveway is designed for egress only, the middle project driveway is designed for ingress and egress and the easternmost project driveway is designed for emergency access and would be gated. The driveway approaches have been designed to comply with all County standards including emergency vehicle access. The project site as designed has driveways and drive aisles that are sufficient width to accommodate emergency response vehicles, including fire trucks. The site serves truck traffic, so has a circulation system that would allow emergency vehicles and fire trucks to turn around on site and exit without further improvements. The primary drive aisle would connect to all the new warehouse buildings with sufficient space between buildings for fire suppression equipment staging. The project will not result in any changes to levels of service or cause any new safety risks. However, pursuant to the W-Trans evaluation, a left-turn lane is warranted at the main project driveway. The need for left-turn channelization via a left-turn pockets on Basalt Road at the three project driveways for the proposed project was evaluated using the criteria published by the County in the Napa County Road and Street Standards (February 4, 2020). Based on the Existing plus Project peak hour volumes and considering the design of the westernmost and easternmost driveways for emergency access and egress only, W-Trans confirmed that a left-turn lane is warranted on Basalt Road at the middle driveway for the proposed project during both the peak periods evaluated. The Napa County Department of Public Works has required the installation of this Left Turn Lane Pocket on Basalt Road as a Condition of Approval in their November 15, 2023, Addendum Memo. Impacts would be less than significant.
- e. The project has been designed with 484 new parking spaces, where 350 spaces are required, in accordance with the Napa County Development Code parking requirements. The proposed project includes 16 accessible spaces and 16 bicycle parking spaces. In addition, the proposed project includes loading spaces for delivery trucks. The warehouse facility has capacity from approximately 240-250 employees on site at one-time. The project will not result in inadequate parking and there is no impact.

Mitigation Measures: None are required.

XVIII. TRIBAL CULTURAL RESOURCES. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

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

Discussion:

a/b. On March 30, 2020, County Staff sent invitations to consult on the proposed project to Native American tribes who had a cultural interest in the area and who as of that date had requested to be invited to consult on projects, in accordance with the requirements of Public Resources Code section 21080.3.1. A response was received from the Yocha Dehe Wintun Nation on March 30, 2020, that indicated that the project site was located within their aboriginal territories and that the tribe had concerns that the project could impact unknown cultural resources. The tribe requested a site visit to evaluate those cultural concerns. Due to project delays and meeting complications caused by the COVID-19 pandemic, the site visit was delayed. On October 18, 2022, a second round of invitations to consult on the proposed project was sent to Native American tribes who had a cultural interest in the area and who as of that date had requested to be invited to consult on projects. A response was received from the Yocha Dehe Wintun Nation on December 6, 2022, that indicated that the project site was located within their aboriginal territories, thus they have a cultural interest in the proposed project area and requested to be kept informed of the project. No consultation was requested at this time.

On October 25, 2024, due to discrepancies between the previous responses, County Staff contacted the Yocha Dehe Cultural Resources offices to confirm whether the tribe was interested in consulting on the project. A tribal consultation meeting was requested for November 14, 2024. In that meeting representatives from the Yocha Dehe Wintun Nation expressed a desire for the County to include mitigation measures for onsite tribal cultural resource monitoring and cultural resource identification training before ground disturbance. Mitigation Measures **TCR-1, TCR-2, TCR-3, TCR-4, TCR-5** are proposed which, if adopted, would maintain impacts to Tribal Cultural Resources as less than significant.

No other responses from tribes were received from either the March 30, 2020, or October 13, 2022, notification letters.

Consistent with standard conditions of approval for cultural and historical resources, if archaeological or cultural resources are found during grading of the project, construction of the project is required to cease, and a qualified archaeologist will be retained to investigate the site in accordance with the following standard condition of approval that will be imposed on the project:

7.2 ARCHEOLOGICAL FINDING

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

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

Mitigation Measures:

Due to the possibility of unearthing tribal cultural resources which include, but is not limited to, Native American human remains, funerary objects, items or artifacts, sites, features, places, landscapes or objects with cultural values to the Yocha Dehe Wintun Nation (“Tribe”), during ground

disturbance activities, the following mitigation measures shall be incorporated into the Project for preservation or mitigation of significant impacts to tribal cultural resources.

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

Method of Monitoring: Prior to the issuance of any grading or building permits pursuant to this approval the permittee shall provide the PBES Department, Planning Division with communication between the permittee and the Yocha Dehe Wintun Nation Cultural Resources Department demonstrating that a Tribal Cultural Advisor has been identified and retained for monitoring activities during ground disturbance.

MM TCR-2: Ground disturbing activities occurring in conjunction with the Project shall be monitored on a full-time basis by qualified tribal monitor(s) approved by the Tribe. The tribal monitoring shall be supervised by the project Tribal Cultural Advisor. Tribal monitoring should be conducted by qualified tribal monitor(s) approved by the Tribe, who is defined as qualified individual(s) who has experience with identification, collection and treatment of tribal cultural resources of value to the Tribe. The duration and timing of the monitoring will be determined by the project Tribal Cultural Advisor. If the project Tribal Cultural Advisor determines that full-time monitoring is no longer warranted, he or she may recommend that tribal monitoring be reduced to periodic spot-checking or cease entirely. Tribal monitoring would be reinstated in the event of any new or unforeseen ground disturbances or discoveries.

Method of Monitoring: This mitigation measure will continue during grading or ground disturbance activities, or until the project Tribal Cultural Advisor determines that monitoring is no longer warranted. The permittee will inform the PBES Department, Planning Division, of a change in monitoring status.

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

Method of Monitoring: This mitigation measure will continue during grading or ground disturbance activities, or until the project Tribal Cultural Advisor determines that monitoring is no longer warranted. The permittee will inform the PBES Department, Planning Division, of a change in monitoring status.

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

Method of Monitoring: Prior to the issuance of any grading or building permits pursuant to this approval the permittee shall provide the PBES Department, Planning Division, with acknowledgement that on-site personnel of the project have received cultural resource training approved by the project Tribal Cultural Advisor or his or her authorized designee.

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

Method of Monitoring: This mitigation measure will continue during grading or ground disturbance activities.

XIX.	UTILITIES AND SERVICE SYSTEMS. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
	a) Require or result in the relocation or construction of a new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion:

- a. The project would not require the construction of a new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. The project site is located in an area planned for industrial development and includes facilities sized to accommodate the proposed project. Impacts would be less than significant.
- b. As discussed in Section X. A Water Availability Analysis was prepared by GHD (July 2023). The report includes calculations for the existing and proposed water uses. Overall total groundwater usage would increase under the proposed project, approximately by 11.58 af/yr, but total annual groundwater use of the project is not expected and will be administratively monitored to ensure it does not exceed the groundwater use criteria for the GSA subbasin of .3 af/yr per acre of the project parcel. The proposed project includes storage tanks which will be sized appropriately. Water supplies should be sufficient during foreseeable normal, dry and multiple dry years. Impacts would be less than significant.
- c. Wastewater will be treated with an on-site wastewater treatment system and would not require a wastewater treatment provider. The Division of Environmental Health has reviewed the applicant's Wastewater Feasibility Report and concurred with its findings and conditioned as appropriate. Impacts would be less than significant.
- d/e. Non-recyclable and non-organic waste generated on the property is collected by Napa Recycling and Waste Services (NRWS) and ultimately deposited at the Clover Flat Landfill, which, having reached roughly 15 percent of its capacity in the first 12 years of its approximated 50 years of operation (which began in 1992), and extrapolating that same rate of material to date, has adequate capacity remaining to accommodate any non-recyclable and non-organic waste generated from the proposed winery. Beginning in 2016, all establishments that would generate organic waste (such as food waste from wine/food pairings or food service at the proposed winery's marketing events) are required to participate in NRWS's food composting program, as a means to support efforts to achieve State mandates for reductions of greenhouse gas emissions generated from decomposition of material into landfills. Impacts are less than significant.

Mitigation Measures: None are required.

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

Discussion:

a-d. There are no project features that would substantially impair an adopted emergency response plan or emergency evacuation plan. Although the project site is just southeast of the City of Napa it is located within a Moderate and High Fire Severity zones. The project site is generally flat with slopes ranging from 0-5% and includes existing disturbed industrial areas, approximately 1.5 miles from a fire station. There are currently no overhead power lines within the vicinity of the project site, nor will any new overhead power lines be constructed in the area. The proposed driveway will provide adequate access to the site from Basalt Road and State Route 221. The project would comply with current California Department of Forestry and California Building Code requirements for fire safety including fire suppression infrastructure. Impacts would be less than significant, and no mitigation is required.

Mitigation Measures: None are required.

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

Discussion:

- a. The site is an existing industrial site that has been previously disturbed and does not contain any known listed plant or animal species. The project will not 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, or reduce the number or restrict the range of a rare or endangered plant or animal. As discussed in **Section IV** above, although no special-status species were found during site surveys, mitigation measures are proposed to conduct pre-construction surveys in the event that special-status species inhabit the site prior to construction. The applicant is also proposing to restore Riparian area along Arroyo Creek on its northern boundary. All work in this area will be required to receive the appropriate permits before beginning work. All potential biological related impacts would be less than significant, with mitigation. As identified in **Section V** above, no known historically sensitive sites or structures, archaeological or paleontological resources, sites of unique geological features have been identified within the project site. No historic or prehistoric resources are anticipated to be affected by the proposed project nor will the proposed project eliminate important examples of the major periods of California history or prehistory. In the event archaeological artifacts are found, a standard condition of approval and mitigation measure would be incorporated into the project. Impacts would be less than significant.
- b. The project does not have impacts that are individually limited but cumulatively considerable. Potential air quality, greenhouse gas emissions, hydrology, and traffic impacts are discussed in the respective sections above. The analysis determined that all potential impacts were less than significant and would not contribute significantly to cumulative impacts. The project does not propose new development that would have a significant impact on the environment or substantially change the existing conditions. With the imposition of standard and project specific conditions of approval, the project does not have impacts that are individually limited, but cumulatively considerable.
- c. There are no schools or hospitals housing sensitive receptors within a quarter-mile of the project site, although the Napa State Hospital is approximately ½ mile north of the project site. Noise from construction that would occur with construction and installation of the proposed site improvements would be temporary, lasting approximately 12 to 18 months, would be limited to daytime hours, and would be subject to best management practices intended to limit fugitive dust and protect stormwater quality. Ongoing operations of the facility are also anticipated to have less than significant noise impacts on nearby dormitory style residences due to distance between those residences and the proposed warehouse facility work areas. Impacts would be less than significant.

**Napa 55 Logistics Use Permit No. P19-00421-UP
Mitigation Monitoring and Reporting Program**

Potential Environmental Impact	Adopted Mitigation Measure	Monitoring and Reporting Actions and Schedule	Implementation	Monitoring	Reporting & Date of Compliance/Completion
<p>Impact BIO-1: Frog Pre-construction Protocol Surveys. Because there is potential for certain species to occur in the Study Area, preconstruction surveys would confirm presence/absence of these species at the time of the proposed construction and ensure no adverse effect to any species encountered. The following measures are recommended to avoid or otherwise minimize potential impacts to these species.</p>	<p>MM BIO-1:</p> <ol style="list-style-type: none"> 1. If earth disturbing activities, vegetation clearing and/or construction activities would take place during the reproductive seasons for California red-legged frog or foothill yellow-legged frog (November–July) a qualified biologist shall conduct a preconstruction survey 24 hours before the initiation of those activities along the riparian zone of Arroyo Creek. 2. Should any California red-legged frogs be present within the development area during the preconstruction survey, no work shall begin. The qualified biologist shall contact Napa County, USFWS, and CDFW within 24 hours of the observation. Work shall not begin until USFWS has provided authorization, and the frog has left on its own accord. If foothill yellow-legged frogs are discovered during the preconstruction survey, the qualified biologist shall contact Napa County and CDFW within 24 hours, and project construction shall not begin until CDFW provides written permission to do so. 3. A copy of the preconstruction survey results, that includes any find and relocation efforts shall be provided to Napa County and CDFW before project vegetation removal or earth-disturbing activities begin. 	<p>If construction/earthmoving activity is to occur between November 1st and July 31st the survey prepared by a qualified biologist shall be submitted to Planning Division staff 24 hours prior to initiation of earth disturbing activities, vegetation clearing and/or construction activities.</p>	P	PD	<p align="center">PC __/__/__</p>
<p>Impact BIO-2: Swainson’s Hawk Pre-construction Protocol Surveys. Because there is potential for certain species to occur in the Study Area a preconstruction raptor survey during the hawk’s breeding period would reveal its presence or absence within the Study Area. Therefore, prior to issuance of a grading permit for development:</p>	<p>MM BIO-2:</p> <ol style="list-style-type: none"> 1. A pre-construction nesting bird survey shall be conducted on-site within 15 days prior to construction, vegetation clearing and/or earth disturbing activities if those activities would commence between March 1st and September 1st (“the nesting season”). If disturbance associated with the project would occur outside of the nesting season, no surveys shall be required. 2. If Swainson’s hawk are identified as nesting on the project site, a non-disturbance buffer of 75-feet shall be established or as otherwise prescribed by a qualified ornithologist. The buffer shall be demarcated with painted orange lath or via the installation of orange construction fencing. Disturbance within the buffer shall be postponed until a qualified ornithologist has determined that the young have attained sufficient flight skills to leave the area or that the nesting cycle has otherwise completed. 	<p>If construction/earthmoving activity is to occur between March 1st and September 1st the survey prepared by a qualified biologist shall be submitted to Planning Division staff 15 days prior to initiation of earth disturbing activities, vegetation clearing and/or construction activities.</p>	P	PD	<p align="center">PC __/__/__</p>

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Napa 55 Logistics Use Permit P19-00421-UP; Mitigation, Monitoring & Reporting Program

Potential Environmental Impact	Adopted Mitigation Measure	Monitoring and Reporting Actions and Schedule	Implementation	Monitoring	Reporting & Date of Compliance/Completion
<p>Impact BIO-3: Western Pond Turtle Pre-construction Protocol Surveys. Because there is potential for Western Pond Turtle to occur in the Study Area, preconstruction surveys would confirm presence/absence of these species at the time of the proposed construction and ensure no adverse effect to any encountered. The following measures are recommended to avoid or otherwise minimize potential impacts to this species.</p>	<p>MM BIO-3: A qualified biologist would perform a pre-construction survey for pond turtles within Arroyo Creek no more than 14 days prior to initiation of ground disturbing, vegetation removal or construction activities. The California Department of Fish and Wildlife will be contacted if pond turtles are found within the planned Study Area and will recommend appropriate mitigation measures to avoid adverse effects on the species.</p>	<p>A minimum of 14 days prior to earth disturbing activities, vegetation clearing and/or construction activities the project applicant will provide to the Planning Division the survey results.</p>	P	PD	PC _/_/_/___
<p>Impact BIO-4: Riparian Zone Restoration Permitting The applicant plans to remove prior unpermitted improvements (asphalt, a fence, drainage channels, sediment stockpiles and other various industrial detritus) and restore the Riparian area of Arroyo Creek adjacent to the project. Permits. Restoration work within Arroyo Creek will potentially require permits from applicable resource agencies such as California Department of Fish and Wildlife (CDFW), US Army Corps of Engineers (USACOE) and the Regional Water Quality Control Board (RWQCB).</p>	<p>MM BIO-4: Prior to ground disturbing, vegetation removing or construction activities, the permittee shall first obtain all required permits from applicable resource agencies for restoration work along Arroyo Creek, including a Lake and Streambed Alteration Agreement (LSAA) from the California Department of Fish and Wildlife (CDFW), a 404 permit from the US Army Corps of Engineers (USACOE), and a 401 water quality certification from the Regional Water Quality Control Board (RWQCB). All work performed shall be in conformance with CDFW, USACE, and RWQCB requirements. The applicant will demonstrate that work has been completed prior to issuance of a certificate of occupancy.</p>	<p>Prior to issuance of a certificate of occupancy for any of the four (4) speculative warehouse/industrial facilities the applicant will provide to the Planning Division verification that all required permits from applicable resource agencies for restoration work along Arroyo Creek have been received and verification that the restoration work has been completed in compliance with approved restoration plans.</p>	P	PD	PCO _/_/_/___

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Napa 55 Logistics Use Permit P19-00421-UP; Mitigation, Monitoring & Reporting Program

Potential Environmental Impact	Adopted Mitigation Measure	Monitoring and Reporting Actions and Schedule	Implementation	Monitoring	Reporting & Date of Compliance/Completion
<p>Impact HHM-1: Building Pre-Demolition Surveys Existing buildings on the site were constructed when the use of asbestos-containing materials (ACMs) and lead-bearing paint and coatings in construction was common.</p>	<p>MM HHM-1: Pre-demolition surveys shall be conducted for ACM's (asbestos-containing material), LBP (lead-bearing paint and coatings), and other potentially hazardous building materials, including "universal wastes". A report shall be submitted to the PBES Planning and Building divisions identifying any of these hazardous materials exist on site, verifying whether they have been removed properly prior to demolition and/or providing best management practices for their abatement prior to issuance of a demolition permit associated with this project.</p>	<p>The pre-demolition survey report will be submitted to the PBES Planning and Building division prior to the issuance of any demolition permit.</p>	P	PD, B	PC _/_/___
<p>Impact HHM-2: Soil Management Plan. The redevelopment grading process could also expose near-surface soil contamination, such as in areas where tenants may have stored and used oil and/or other potentially hazardous substances. Suspected soil contamination, if any, will be investigated by sampling and analysis, and soil confirmed as being contaminated will be removed, temporarily stockpiled, and then transported offsite for disposal or to be recycled as appropriate.</p>	<p>MM HHM-2: Prior to issuance of grading permits associated with this project, a qualified professional will prepare a Soils Management Plan (SMP), as detailed in Avocet Environmental's Revised Work Plan for Waste Characterization and Management dated January 4, 2022, and submit the SMP to the PBES Planning and Environmental Health divisions for review and approval. The SMP will include procedures for identifying, segregating, stockpiling, and characterizing soil suspected of being contaminated. The SMP will also include conservative screening levels for use in determining whether impacted soil, if encountered, can be reused onsite or must be transported offsite or disposal or to be recycled. A copy of this report will be kept onsite by the grading contractor during clearing and grading of the site in preparation of redevelopment. The permittee will acknowledge that the grading contractor has been trained on the procedures contained in this report.</p>	<p>The SMP will be submitted to the PBES Planning and Environmental Health divisions for review and approval prior to the issuance of any grading permit.</p>	P	PD, EH	PC _/_/___
<p>Impact TCR-1. Due to the possibility of unearthing tribal cultural resources which include, but is not limited to, Native American human remains, funerary objects, items or artifacts, sites, features, places, landscapes or objects with cultural values to the Yocha Dehe Wintun Nation ("Tribe"), during ground disturbance activities, the following mitigation measures shall be incorporated into the Project for preservation or mitigation of significant impacts to tribal cultural resources.</p>	<p>MM TCR-1: Prior to ground disturbance activities, the applicant shall retain a project Tribal Cultural Advisor designated by the Tribe, to direct all mitigation measures related to tribal cultural resources.</p>	<p>Prior to the issuance of any grading or building permits pursuant to this approval the permittee shall provide the PBES Department, Planning Division with communication between the permittee and the Yocha Dehe Wintun Nation Cultural Resources Department demonstrating that a Tribal Cultural Advisor has been identified and retained for monitoring activities during ground disturbance.</p>	P	PD	PC _/_/___

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Potential Environmental Impact	Adopted Mitigation Measure	Monitoring and Reporting Actions and Schedule	Implementation	Monitoring	Reporting & Date of Compliance/Completion
<p>Impact TCR-2. Due to the possibility of unearthing tribal cultural resources which include, but is not limited to, Native American human remains, funerary objects, items or artifacts, sites, features, places, landscapes or objects with cultural values to the Yocha Dehe Wintun Nation ("Tribe"), during ground disturbance activities, the following mitigation measures shall be incorporated into the Project for preservation or mitigation of significant impacts to tribal cultural resources.</p>	<p>MM TCR-2: Ground disturbing activities occurring in conjunction with the Project shall be monitored on a full-time basis by qualified tribal monitor(s) approved by the Tribe. The tribal monitoring shall be supervised by the project Tribal Cultural Advisor. Tribal monitoring should be conducted by qualified tribal monitor(s) approved by the Tribe, who is defined as qualified individual(s) who has experience with identification, collection and treatment of tribal cultural resources of value to the Tribe. The duration and timing of the monitoring will be determined by the project Tribal Cultural Advisor. If the project Tribal Cultural Advisor determines that full-time monitoring is no longer warranted, he or she may recommend that tribal monitoring be reduced to periodic spot-checking or cease entirely. Tribal monitoring would be reinstated in the event of any new or unforeseen ground disturbances or discoveries.</p>	<p>This mitigation measure will continue during grading or ground disturbance activities, or until the project Tribal Cultural Advisor determines that monitoring is no longer warranted. The permittee will inform the PBES Department, Planning Division, of a change in monitoring status.</p>	P	PD	OG _/_/_/___
<p>Impact TCR-3. Due to the possibility of unearthing tribal cultural resources which include, but is not limited to, Native American human remains, funerary objects, items or artifacts, sites, features, places, landscapes or objects with cultural values to the Yocha Dehe Wintun Nation ("Tribe"), during ground disturbance activities, the following mitigation measures shall be incorporated into the Project for preservation or mitigation of significant impacts to tribal cultural resources.</p>	<p>MM TCR-3: The project Tribal Cultural Advisor and tribal monitor(s) may halt ground disturbance activities in the immediate area of discovery when known or suspected tribal cultural resources are identified until further evaluation can be made in determining their significance and appropriate treatment or disposition. There must be at minimum one tribal monitor for every separate area of ground disturbance activity that is at least 30 meters or 100 feet apart unless otherwise agreed upon in writing between the Tribe and applicant. Depending on the scope and schedule of ground disturbance activities of the Project (e.g., discoveries of cultural resources or simultaneous activities in multiple locations that requires multiple tribal monitors, etc.) additional tribal monitors may be required on-site. If additional tribal monitors are needed, the Tribe shall be provided with a minimum of three (3) business days advance notice unless otherwise agreed upon between the Tribe and applicant. The on-site tribal monitoring shall end when the ground disturbance activities are completed, or when the project Tribal Cultural Advisor have indicated that the site has a low potential for tribal cultural resources.</p>	<p>This mitigation measure will continue during grading or ground disturbance activities, or until the project Tribal Cultural Advisor determines that monitoring is no longer warranted. The permittee will inform the PBES Department, Planning Division, of a change in monitoring status.</p>	P	PD	OG _/_/_/___

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Potential Environmental Impact	Adopted Mitigation Measure	Monitoring and Reporting Actions and Schedule	Implementation	Monitoring	Reporting & Date of Compliance/Completion
<p>Impact TCR-4. Due to the possibility of unearthing tribal cultural resources which include, but is not limited to, Native American human remains, funerary objects, items or artifacts, sites, features, places, landscapes or objects with cultural values to the Yocha Dehe Wintun Nation ("Tribe"), during ground disturbance activities, the following mitigation measures shall be incorporated into the Project for preservation or mitigation of significant impacts to tribal cultural resources.</p>	<p>MM TCR-4: All on-site personnel of the Project shall receive adequate cultural resource sensitivity training approved by the project Tribal Cultural Advisor or his or her authorized designee prior to initiation of ground disturbance activities on the Project. The training must also address the potential for exposing subsurface resources and procedures if a potential resource is identified. The Project applicant will coordinate with the Tribe on the cultural resource sensitivity training.</p>	<p>Prior to the issuance of any grading or building permits pursuant to this approval the permittee shall provide the PBES Department, Planning Division, with acknowledgement that on-site personnel of the project have received cultural resource training approved by the project Tribal Cultural Advisor or his or her authorized designee.</p>	P	PD	PC _/_/___
<p>Impact TCR-5. Due to the possibility of unearthing tribal cultural resources which include, but is not limited to, Native American human remains, funerary objects, items or artifacts, sites, features, places, landscapes or objects with cultural values to the Yocha Dehe Wintun Nation ("Tribe"), during ground disturbance activities, the following mitigation measures shall be incorporated into the Project for preservation or mitigation of significant impacts to tribal cultural resources.</p>	<p>MM TCR-5: The Project applicant must meet and confer with the Tribe, at least 45 days prior to commencing ground disturbance activities on the Project to address notification, protection, treatment, care and handling of tribal cultural resources potentially discovered or disturbed during ground disturbance activities of the Project. All potential cultural resources unearthed by Project activities shall be evaluated by the project Tribal Cultural Advisor. The Tribe must have an opportunity to inspect and determine the nature of the resource and the best course of action for avoidance, protection and/or treatment of tribal cultural resources to the extent permitted by law. If the resource is determined to be a tribal cultural resource of value to the Tribe, the Tribe will coordinate with the Project applicant to establish appropriate treatment and disposition of the resources with appropriate dignity which may include reburial or preservation of resources. The Project applicant must facilitate and ensure that the determination of treatment and disposition by the Tribe is followed to the extent permitted by law. No laboratory studies, scientific analysis, collection, curation, or video recording are permitted for tribal cultural resources without the prior written consent of the Tribe.</p>	<p>This mitigation measure will continue during grading or ground disturbance activities.</p>	P	PD	OG _/_/___

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Napa 55 Logistics Use Permit P19-00421-UP; Mitigation, Monitoring & Reporting Program

PROJECT REVISION STATEMENT
Napa 55 Logistics Use Permit #P19-00421-UP

I hereby revise Napa 55 Logistics Use Permit #P19-00421-UP for a new 697,000 sq. ft. warehouse/industrial facility located on a 55.27 acre parcel (APN's 046-370-024) located at 11 Basalt Road, Napa, CA 94559 to include the measures specified below:

MM BIO-1: Because there is potential for certain species to occur in the Study Area, preconstruction surveys would confirm presence/absence of these species at the time of the proposed construction and ensure no adverse effect to any species encountered. The following measures are recommended to avoid or otherwise minimize potential impacts to these species.

1. If earth disturbing activities, vegetation clearing and/or construction activities would take place during the reproductive seasons for California red-legged frog or foothill yellow-legged frog (November–July) a qualified biologist shall conduct a preconstruction survey 24 hours before the initiation of those activities along the riparian zone of Arroyo Creek.
2. Should any California red-legged frogs be present within the development area during the preconstruction survey, no work shall begin. The qualified biologist shall contact Napa County, USFWS, and CDFW within 24 hours of the observation. Work shall not begin until USFWS has provided authorization, and the frog has left on its own accord. If foothill yellow-legged frogs are discovered during the preconstruction survey, the qualified biologist shall contact Napa County and CDFW within 24 hours, and project construction shall not begin until CDFW provides written permission to do so.
3. A copy of the preconstruction survey results, that includes any find and relocation efforts shall be provided to Napa County and CDFW before project vegetation removal or earth-disturbing activities begin.

Monitoring: If construction/earthmoving activity is to occur between November 1st and July 31st the survey prepared by a qualified biologist shall be submitted to Planning Division staff 24 hours prior to initiation of earth disturbing activities, vegetation clearing and/or construction activities.

MM BIO-2: Because there is potential for certain species to occur in the Study Area a preconstruction raptor survey during the hawk's breeding period would reveal its presence or absence within the Study Area. Therefore, prior to issuance of a grading permit for development:

1. A pre-construction nesting bird survey shall be conducted on-site within 15 days prior to construction, vegetation clearing and/or earth disturbing activities if those activities would commence between March 1st and September 1st ("the nesting season"). If disturbance associated with the project would occur outside of the nesting season, no surveys shall be required.
2. If Swainson's hawk are identified as nesting on the project site, a non-disturbance buffer of 75-feet shall be established or as otherwise prescribed by a qualified ornithologist. The buffer shall be demarcated with painted orange lath or via the installation of orange construction fencing. Disturbance within the buffer shall be postponed until a qualified ornithologist has determined that the young have attained sufficient flight skills to leave the area or that the nesting cycle has otherwise completed.

Monitoring: If construction/earthmoving activity is to occur between March 1st and September 1st the survey prepared by a qualified biologist shall be submitted to Planning Division staff 15 days prior to initiation of earth disturbing activities, vegetation clearing and/or construction activities.

MM BIO-3: Because there is potential for Western Pond Turtle to occur in the Study Area, preconstruction surveys would confirm presence/absence of these species at the time of the proposed construction and ensure no adverse effect to any encountered. The following measures are recommended to avoid or otherwise minimize potential impacts to this species.

1. A qualified biologist would perform a pre-construction survey for pond turtles within Arroyo Creek no more than 14 days prior to initiation of ground disturbing, vegetation removal or construction activities. The California Department of Fish and Wildlife will be contacted if pond turtles are found within the planned Study Area and will recommend appropriate mitigation measures to avoid adverse effects on the species.

Monitoring: A minimum of 14 days prior to earth disturbing activities, vegetation clearing and/or construction activities the project applicant will provide to the Planning Division the survey results.

MM BIO-4: Prior to ground disturbing, vegetation removing or construction activities, the permittee shall first obtain all required permits from applicable resource agencies for restoration work along Arroyo Creek, including a Lake and Streambed Alteration Agreement (LSAA) from the California Department of Fish and Wildlife (CDFW), a 404 permit from the US Army Corps of Engineers (USACOE), and a 401 water quality certification from the Regional Water Quality Control Board (RWQCB). All work performed shall be in conformance with CDFW, USACE, and RWQCB requirements. The applicant will demonstrate that work has been completed prior to issuance of a certificate of occupancy.

Monitoring: Prior to issuance of a certificate of occupancy for any of the four (4) speculative warehouse/industrial facilities the applicant will provide to the Planning Division verification that all required permits from applicable resource agencies for restoration work along Arroyo Creek have been received and verification that the restoration work has been completed in compliance with approved restoration plans.

MM HHM-1: Pre-demolition surveys shall be conducted for ACM's (asbestos-containing material), LBP (lead-bearing paint and coatings), and other potentially hazardous building materials, including "universal wastes". A report shall be submitted to the PBES Planning and Building divisions identifying any of these hazardous materials exist on site, verifying whether they have been removed properly prior to demolition and/or providing best management practices for their abatement prior to issuance of a demolition permit associated with this project.

Monitoring: The pre-demolition survey report will be submitted to the PBES Planning and Building division prior to the issuance of any demolition permit.

MM HHM-2: Prior to issuance of grading permits associated with this project, a qualified professional will prepare a Soils Management Plan (SMP), as detailed in Avocet Environmental's Revised Work Plan for Waste Characterization and Management dated January, 4, 2022, and submit the SMP to the PBES Planning and Environmental Health divisions for review and approval. The SMP will include procedures for identifying, segregating, stockpiling, and characterizing soil suspected of being contaminated. The SMP will also include conservative screening levels for use in determining whether impacted soil, if encountered, can be reused onsite or must be transported offsite or disposal or to be recycled. A copy of this report will be kept onsite by the grading contractor during clearing and grading of the site in preparation of redevelopment. The permittee will acknowledge that the grading contractor has been trained on the procedures contained in this report.

Monitoring: The SMP will be submitted to the PBES Planning and Environmental Health divisions for review and approval prior to the issuance of any grading permit.

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

Monitoring: Prior to the issuance of any grading or building permits pursuant to this approval the permittee shall provide the PBES Department, Planning Division with communication between the permittee and the Yocha Dehe Wintun Nation Cultural Resources Department demonstrating that a Tribal Cultural Advisor has been identified and retained for monitoring activities during ground disturbance.

MM TCR-2: Ground disturbing activities occurring in conjunction with the Project shall be monitored on a full-time basis by qualified tribal monitor(s) approved by the Tribe. The tribal monitoring shall be supervised by the project Tribal Cultural Advisor. Tribal monitoring should be conducted by qualified tribal monitor(s) approved by the Tribe, who is defined as qualified individual(s) who has experience with identification, collection and treatment of tribal cultural resources of value to the Tribe. The duration and timing of the monitoring will be determined by the project Tribal Cultural Advisor. If the project Tribal Cultural Advisor determines that full-time monitoring is no longer warranted, he or she may recommend that tribal monitoring be reduced to periodic spot-checking or cease entirely. Tribal monitoring would be reinstated in the event of any new or unforeseen ground disturbances or discoveries.

Monitoring: This mitigation measure will continue during grading or ground disturbance activities, or until the project Tribal Cultural Advisor determines that monitoring is no longer warranted. The permittee will inform the PBES Department, Planning Division, of a change in monitoring status.

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

Monitoring: This mitigation measure will continue during grading or ground disturbance activities, or until the project Tribal Cultural Advisor determines that monitoring is no longer warranted. The permittee will inform the PBES Department, Planning Division, of a change in monitoring status.

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


Monitoring: Prior to the issuance of any grading or building permits pursuant to this approval the permittee shall provide the PBES Department, Planning Division, with acknowledgement that on-site personnel of the project have received cultural resource training approved by the project Tribal Cultural Advisor or his or her authorized designee.

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

Monitoring: This mitigation measure will continue during grading or ground disturbance activities.

Napa 55 Logistics further commit themselves and successors-in-interest to (a) inform any future purchasers of the property of the above commitments; (b) include in all property leases a provision that informs the lessee of these restrictions and binds them to adhere to them, and (c) inform in writing all persons doing work on this property of these limitations.

Napa 55 Logistics understands and explicitly agrees that with regards to all California Environmental Quality Act and Permit Streamlining Act (Government Code Sections 63920-63962) deadlines, this revised application will be treated as a new project. The new date on which said application will be considered complete is the date on which an executed copy of this project revision statement is received by the Napa County Department of Planning, Building and Environmental Services.

DocuSigned by:

12/12/2024

Napa 55 Logistics
(Owner) Timothy Schaedler
Date

