



ADDENDUM TO THE NAPA COUNTY HOUSING ELEMENT UPDATE EIR

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1.0 INTRODUCTION

The Housing Element (Project) is a required element of the General Plan. State law includes specific requirements for both content and process regarding periodic Housing Element updates. Content requirements include a housing needs assessment, identification of constraints to housing development, a description of available housing resources, and an inventory of housing sites, as well as goals, policies, programs, and objectives related to meeting the County's housing needs. The Housing Element addresses how Napa County will accommodate its "fair share" of the regional housing need, which is determined through the Regional Housing Needs Allocation process, or RHNA.

The 2009 Housing Element of the General Plan was adopted in 2009 (Approved Project), and its potential environmental effects were the subject of the Napa County Housing Element Update Environmental Impact Report (Housing Element EIR) (State Clearinghouse Number 2008072011) that was certified by the Board of Supervisors on June 23, 2009. The Housing Element EIR is hereby incorporated by reference under the California Environmental Quality Act (CEQA) Guidelines, Section 15150, and is available at the Napa County Planning, Building, and Environmental Services offices located at 1195 Third Street, Napa, CA. The significant and unavoidable environmental impacts, environmental impacts that can be mitigated to be less than significant, and associated mitigation measures that were identified in the Housing Element EIR are summarized in Appendix A of this document.

Pursuant to State law, Napa County is amending the 2009 Housing Element of the General Plan to provide an updated discussion of housing needs to reflect current conditions and address the 2014 through 2022 RHNA (Modified Project). The Approved Project is briefly described in Section 3.0 of this Addendum to the Housing Element EIR (Addendum), and the Approved Project is described in detail in Chapter 3 of the Draft Housing Element EIR.

Pursuant to CEQA Section 21166 and CEQA Guidelines Sections 15162 and 15164, this Addendum has been prepared to comply with CEQA in support of the adoption of the Modified Project. The primary focus of this Addendum is to analyze the Modified Project to determine whether it involves any new significant environmental impacts that were not identified in Housing Element EIR or whether previously identified significant impacts would be substantially more severe. As described in more detail below, because the Approved Project was the subject of a certified Final EIR and none of the conditions requiring preparation of a Subsequent EIR are met, an Addendum to the Housing Element EIR is the appropriate level of environmental review for the Modified Project. Accordingly, this Addendum builds on the analysis presented in the Housing Element EIR.

2.0 CEQA AUTHORITY FOR THE ADDENDUM

CEQA and the CEQA Guidelines establish the type of environmental documentation that is required when changes to a project occur after an EIR is certified. CEQA Guidelines Section 15164(a) states that:

"The lead agency or responsible agency shall prepare an addendum to a previously certified

EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.”

Section 15162 of the CEQA Guidelines requires that a subsequent EIR need only be prepared if:

1. Substantial changes are proposed in the project, which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
2. Substantial changes occur with respect to the circumstances under which the project is undertaken, which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, shows any of the following:
 - a. The project will have one or more significant effects not discussed in the previous EIR or negative declaration,
 - b. Significant effects previously examined will be substantially more severe than shown in the previous EIR,
 - c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative, or
 - d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

This Addendum evaluates whether changes in circumstances surrounding the Approved Project or new information of substantial importance would cause new significant environmental effects or a substantial increase in the severity of such effects beyond what was identified in the Housing Element EIR. The evaluation of changes in circumstances and new information is focused on whether changes of substantial importance have occurred to environmental conditions in the Project area, or to applicable plans, policies or regulations.

As described and analyzed in detail herein, environmental impacts from the Modified Project will be no more severe than those projected to result from implementation of the Approved Project, and no new significant environmental impacts are projected to occur. Thus, pursuant to CEQA, this Addendum provides the appropriate level of environmental review to address the changes to the Approved Project as part of the Modified Project.

3.0 THE APPROVED PROJECT

The Approved Project consisted of the adoption of a Housing Element pursuant to State law, together with conforming amendments to other elements of the Napa County General Plan, zoning amendments, and other implementing ordinances. The Approved Project presented policies and programs to meet the County's housing needs through 2014.

The Approved Project included the following components, pursuant to Government Code Section 65583:

- *A review of the previous element's goals, policies, programs, and objectives to ascertain the effectiveness of each of these components, as well as the overall effectiveness of the Housing Element.*
- *An assessment of housing needs and an inventory of resources and constraints related to the meeting of these needs.*
- *An analysis and program for preserving assisted housing developments.*
- *A statement of community goals, quantified objectives, and policies relative to the preservation, improvement, and development of housing.*
- *A program which sets forth a schedule of actions that the City is undertaking or intends to undertake, in implementing the policies set forth in the Housing Element to identify adequate sites to accommodate the housing needs of all economic segments of the community. The program must do all of the following:*
 - *Identify actions that will be taken to make adequate sites available to accommodate the City's share of the regional housing need, if the need could not be accommodated by the existing inventory of residential sites;*
 - *Assist in the development of adequate housing to meet the needs of extremely low, very low, low, and moderate income households;*
 - *Address and, where appropriate, remove governmental constraints to the maintenance, improvement, and development of housing;*
 - *Conserve and improve the condition of the existing affordable housing stock;*
 - *Promote housing opportunities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability; and*
 - *Preserve assisted housing developments for lower income households.*

The Approved Project included goals, policies, and programs to address the County's housing needs. The County's regional housing needs allocation (RHNA) for 2007 through 2014 was identified as 569 units, including 259 lower income units.

The Approved Project included a housing sites inventory with adequate capacity to accommodate the County's housing needs. The housing sites inventory identified 93.8 acres of land for residential development. The Approved Project identified objectives to rehabilitate 15 housing units and produce 735 new housing units.

The Housing Element EIR anticipated that development under the Approved Project could result in 1,398 new housing units and a population increase of 3,551 households if all identified housing sites were built upon. Of these units, 1,245 units could be developed on designated housing sites located throughout the County and 153 units could be developed through the implementation of six housing programs.

Refer to Chapter 3, Project Description, of the Housing Element EIR for a complete description of the Approved Project.

4.0 THE MODIFIED PROJECT

The Modified Project includes a housing plan consisting of goals, policies, objectives, and programs that provide the policy framework for the County to address its housing needs. The goals represent the County's overarching values related to housing. The list of policies provides a framework for future actions and decisions-making that will support these goals. Objectives provide a quantifiable list of targets for the County to measure its progress towards certain goals and policies, and programs identify specific actions the County will take to achieve its eight housing goals.

Most of the goals, policies, programs, and objectives presented in the Modified Project would be carried forward from the Approved Project or slightly revise existing goals, policies, programs, and objectives from the Approved Project. Specifically, the Modified Project includes the following changes to the Approved Project to address housing needs:

- The time frame to address housing needs was changed to January 31, 2015 through January 31, 2023.
- Programs which had been completed were removed from the Housing Element.
- Policy H-2a was revised to identify the County's worker proximity housing program as a housing assistance program.
- Policy H-2i (formerly Policy H-2j) was expanded to prohibit the conversion of mobile home parks for replacement by housing for vacation use, second homes, or transient occupancy, to the extent allowed by law.
- Policy H-2j was added to support increasing funding for affordable housing serving the needs of a range of industries.
- Program H-2a was expanded to prioritize use of affordable housing funds on the Napa Pipe site as well as the AHCD sites.

- Program H-2h was added to support continuance of the County's worker proximity program.
- Program H-2i was added to continue to offer financial assistance to property owners who are interested in building second units that would be deed restricted for use by very low- or low-income residents.
- Program H-2j (formerly Program H-2k) was modified to require additional mitigation of the impact of redevelopment of mobile home parks on existing residents.
- Program H-2l (formerly part of Program H-2f) was revised regarding the analysis of the County's inventory of vacant and/or underutilized County-owned properties and, if at least one appropriate site is identified, to require the County to select one site and issue an RFP to solicit proposals from affordable housing developers to develop the site in partnership with the County.
- Program H-2m was added to confirm availability of water for the Napa Pipe site.
- Policy H-3d, which prioritizes housing assistance, was revised to include developmentally disabled in the disabled special needs group and to increase emphasis on housing for farmworker families located near schools, retail, services, and transportation.
- Objective H-3b was revised to support emergency and transitional housing for eight families.
- Objective H-3c was added to facilitate the development of additional farmworker housing.
- Program H-3b was strengthened regarding fair housing outreach efforts.
- Program H-3g was added to identify a site and funding for a new farmworker housing development and to prioritize use of resources available to support new farmworker housing.
- Program H-3h was added to conduct an analysis to identify sites within the unincorporated area where up to 12 units of onsite farmworker housing could be developed, which are near cities and in locations where schools, transit, services, and shopping are relatively easily accessible. The County will provide owners of identified properties with information about opportunities to build farmworker housing on their sites, including potential County assistance.
- Program H-3i was added to encourage developers to propose projects that can address unmet needs for housing with supportive services for the disabled when soliciting developer requests for Affordable Housing Fund monies.
- Program H-4e was added to work with Mid-Peninsula Housing to assist in identifying and securing funding for the 140 low- and very low-income housing units that are contemplated as part of the development.

- Program H-5e was added to monitor the processing of entitlements for priority sites, including the Napa Pipe site.
- Program H-6d was added to establish a Property Assessed Clean Energy (PACE) program to assist homeowners with financing to make sustainable energy improvements to their homes.

The new programs in the Modified Project primarily provide for funding and planning for development of affordable housing and housing appropriate for special needs groups. While the new programs have been added to encourage additional housing to address the County's needs, including farmworker housing, they do not specifically identify the sites where this housing would be located. The County's General Plan and Zoning Code and State Employee Housing Law currently require that the County allow farmworker housing on all agriculturally zoned sites.

The Modified Project identifies quantified objectives for housing rehabilitation, production, and conservation based on the County's realistic expectations of development and conservation efforts that could occur with implementation of the Modified Project. Table 1, Quantified Objectives: Construction and Rehabilitation by Income Level, shows the quantified objectives by income category for the number of units to be constructed and rehabilitated over the planning period for both the Modified Project and the Approved Project. The Modified Project would reduce the new housing construction objective from 735 units under the Approved Project to 180 units. The Modified Project would increase the rehabilitation objective from 15 units under the Approved Project to 19 units. The Modified Project would seek to conserve, at minimum, the 3 existing County-owned farmworker centers (each counted as a single unit) and 30 existing mobile home units. No assisted affordable units that are at-risk of conversion were identified by either the Approved Project or Modified Project; therefore the Modified Project does not establish an objective for the preservation of assisted units.

TABLE 1: QUANTIFIED OBJECTIVES: CONSTRUCTION AND REHABILITATION BY INCOME LEVEL

Income Levels	New Construction Modified Project / Approved Project	Rehabilitation Modified Project / Approved Project	Conservation of Farmworker Centers and Mobile Homes Modified Project / Approved Project
Extremely Low	26 / 60	4 / 5	0 / 0
Very Low	25 / 70	8 / 5	3 (farmworker centers) / 0
Low	30 / 70	7 / 5	15 / 0
Moderate	32 / 50	0	15 / 0
Above Moderate	67 / 485	0	NA / NA
Total	180 / 735	19 / 15	33 / 0

NA = Not Applicable

Source: Napa County, Draft 2014 Housing Element; Napa County, 2009 Housing Element

Although the quantified objectives in the Modified Project have been reduced to be equal to the County's Regional Housing Need Allocation (RHNA) of 180 units from 2014 through 2022, no sites have been removed from the housing inventory. The Modified Project identifies 93.8 acres of land in the inventory of housing development sites; these are the same sites as the Approved Project identified. The sites identified in the inventory (Table H-G), at all income levels, would accommodate up to 1,677 housing units. Each of the housing sites in the inventory of housing development sites is designated for residential use in the General Plan and Zoning Ordinance. The only increase in housing capacity shown in the Housing Element is on the Napa Pipe site, where the total number of units that may be accommodated has been increased from 304 to a range of 700 to 945 units (with the higher number allowed if the developer requests a maximum density bonus). The County's Agricultural Preservation and Land Use Element of the General Plan and its Zoning Ordinance were amended on June 4, 2013 to permit 700 to 945 units on the Napa Pipe site, and this amendment to the Housing Element merely achieves internal consistency of the Housing Element with the already adopted Agricultural Preservation and Land Use Element and Zoning Ordinance amendments. As a consequence, this amendment will have no environmental effects, since it can be seen with certainty that there is no possibility that achieving internal consistency with an already-adopted policy may have a significant effect on the environment. (CEQA Guidelines Section 15061(b)(3); *Muzzy Ranch Co. v. Solano County Airport Land Use Comm'n.*) The environmental effects of the Napa Pipe project approvals were fully analyzed and disclosed in the Napa Pipe EIR (State Clearinghouse Number 2008122111).

In order to accommodate its allocated housing needs, the County does not need to identify additional sites. No changes to General Plan land use designations or zoning would occur to accommodate the County's RHNA and the needs enumerated in the 2014 Housing Element Needs Assessment.

In summary, the Modified Project makes minor changes to the policies and programs that were adopted as part of the Approved Project. None of the proposed goals, policies, objectives, or programs in the Modified Project would result in changes to the General Plan Land Use Map or to the Zoning Map. The goals, policies, objectives, and programs of the Modified Project are consistent with the other elements of the General Plan and would not result in development intensities or footprints of development not anticipated under the General Plan Land Use Map. The programs included in the Modified Project would not change the potential location of development, increase the intensity of development over that already adopted, or result in development that is not consistent with the growth allowed under the County's General Plan. The Modified Project does not identify any new housing sites and would not change the approved densities and land uses that could occur on potential housing sites in the County.

5.0 COMPARATIVE ANALYSIS OF IMPACTS

As previously described, Section 15162 of the CEQA Guidelines states that one of the conditions that would warrant preparation of a subsequent EIR is if substantial changes are proposed in the project which will require major revisions of the previous EIR due to the

involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

An analysis was conducted to compare the impacts of the Modified Project with the impacts analyzed in the Housing Element EIR for the Approved Project.

Under the Modified Project, the inventory of housing sites and proposed policies and programs would not result in changes in the location of potential future development or increase residential densities and land use intensities. The County has adequate housing sites to accommodate its regional housing needs allocation over the current housing cycle.

As previously described, the programs included in the Modified Project would not change the potential location of development, increase the intensity of development, or result in development that is not consistent with the growth allowed under the County's General Plan. The Housing Element EIR addressed the Approved Project's potential for single family, multifamily, group homes, senior housing, farmworker housing, second units, housing for disabled persons, and other housing types allowed under the County's General Plan. The Modified Project encourages farmworker housing, but would not change the location or increase the intensity of potential farmworker housing in comparison to the Approved Project, nor does the Modified Project identify specific sites for farmworker housing. State law requires that farmworker housing be allowed on agriculturally zoned sites.

The Modified Project may broaden the range of households that can afford existing and future housing in unincorporated Napa County, and may assist with making potential and future housing available to moderate and lower income households and special needs groups, including farmworkers.

As discussed above, the programmatic changes made by the Modified Project primarily relate to financing and planning of affordable housing developments and do not change the development permitted on any site. These changes will not create additional environmental impacts.

The County has adequate housing sites to accommodate its regional housing needs allocation over the current housing cycle. The Modified Project is consistent with the General Plan Land Use Map as analyzed in the General Plan EIR, Housing Element EIR, and Napa Pipe EIR. The Modified Project does not propose any changes to the General Plan Land Use Map.

As shown below in Table 2, Comparison of Approved Project Impacts and Modified Project Impacts, the Modified Project would not result in new or substantially more severe project or cumulative impacts in any of the environmental topics addressed by the certified Housing Element EIR. Thus, the changes as part of the Modified Project would be within the envelope of impacts analyzed for the Approved Project. Since no new or substantially more severe impacts would occur as a result of the changes as part of the Modified Project, a subsequent EIR would not be required to address these Project changes pursuant to

Section 15162 of the CEQA Guidelines. All mitigation measures required for the Approved Project and required for Napa Pipe would be applicable to the Modified Project.

6.0 CHANGES IN CIRCUMSTANCES

In addition to the effects of the Project changes discussed in Section 5.0 of this Addendum, Comparative Analysis of Impacts, Section 15162 of the CEQA Guidelines states that a subsequent EIR would be required if substantial changes occur with respect to the circumstances under which the project is undertaken which would require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

Since the certification of the Housing Element EIR and adoption of the Approved Project, there has been a downward trend in the amount of growth that is anticipated to occur in the region. Regional planning efforts have shifted the location of projected growth in the Bay Area. Plan BayArea, a long-range integrated transportation and land use/housing strategy through 2040 that was approved by the Association of Bay Area Governments (ABAG) and the Metropolitan Transportation Commission (MTC), focuses on the Bay Area's urban core. The Regional Housing Needs Plan, which was prepared to be consistent with the growth projections in Plan BayArea, reduced the allocation of residential and population growth to non-urban areas, such as Napa County, and focused the majority of new growth in existing urbanized areas and areas planned for higher density residential development with a strong public transit orientation.

The Approved Project and Housing Element EIR anticipated that the unincorporated County would have a population of 36,114 in 2030. However, the 2013 Projections prepared by the ABAG reflect the a change in regional land use planning as well as the downturn in the housing market that began in the late 2000s, indicating that in 2030 there will be a population of 29,300.

The Housing Element EIR analyzed buildout of the inventory of the same housing sites, anticipating that development under the Approved Project could result in 1,140 new housing units. However, largely due to the Great Recession commencing in 2008, development of the inventory of housing sites did not occur. Conditions on the housing sites remain similar to the conditions at the time of the certification of the Housing Element EIR. The Modified Project identifies that 1,677 units could occur in comparison to the 1,140 units analyzed in the EIR for the Approved Project; however, this increase is due entirely to the previously approved entitlements for the approved Napa Pipe project and is not a result of the Modified Project, which is required to be consistent with the County's Agricultural Preservation and Land Use Element. The Modified Project does not propose any additional changes to the Napa Pipe site.

The Modified Project would not result in any direct population growth, as the Modified Project does not include any changes to land use designations or zoning that would create new opportunities for residential development.

To address the potential for other changed circumstances to result in new or substantially more severe cumulative impacts, a review was completed of plans, policies, and regulations that would apply to the Modified Project. No new plans, policies, or regulations that would result in new significant environmental impacts or an increase in the severity of environmental impacts were identified.

7.0 NEW INFORMATION

Overall, the changes in circumstances that have occurred since preparation of the Housing Element EIR would not result in new significant impacts or substantial increases in the severity of previously identified significant impacts in association with the Modified Project. No other additional information of substantial importance, which would require major revisions to earlier analyses that would warrant preparation of a subsequent EIR pursuant to Section 15162 of the CEQA Guidelines, has been identified or received.

As discussed above, the Modified Project would not result in new or substantially more severe project or cumulative impacts in any of the environmental topics addressed by the certified Housing Element EIR; circumstances have not changed to result in new or substantially more severe cumulative impacts; and no additional information of substantial importance requiring major revisions to earlier analyses was identified or received. Therefore, pursuant to Section 15164 of the CEQA Guidelines, an Addendum to the Housing Element EIR provides the appropriate level of environmental review for the Modified Project.

TABLE 2: COMPARISON OF APPROVED PROJECT IMPACTS AND MODIFIED PROJECT IMPACTS

Environmental Issues	Approved Project Impacts	Modified Project Impacts
<u>Aesthetics</u> <i>a through d) Would the project result in substantial adverse effects regarding a scenic vista, scenic resources, visual character, and light or glare?</i>	The Housing Element EIR identifies significant and unavoidable impacts to visual resources due to development that could affect a scenic vista and scenic route and determines that no mitigation was feasible (See Addendum Appendix A, Impact VIS-1). The Housing Element EIR identifies that development on the Napa Pipe site would be a significant change in visual character that could affect view corridors and required mitigation to reduce the impact (See Appendix A, Impact VIS-2 and Mitigation Measure VIS-2).	As previously described, the Modified Project does not designate any new sites for development and would not result in any changes to the location or increase the intensity of future development. Therefore, the Modified Project would not result in changes to development or development patterns that would interfere with views of scenic resources, would not change view of or from scenic highways, and would not result in changes in development that would result in increased light or glare. The Modified Project would not result in any new potential aesthetic impacts and would not increase the significance of any aesthetic impacts.
<u>Agricultural and Forest Resources</u> <i>a through e) Would the project convert Farmland to non-agricultural use, conflict with existing agricultural zoning or Williamson Act contracts, involve other changes that could convert Farmland, or involve changes that could convert forest and timber resources to non-residential uses?</i>	No significant impacts to agricultural resources are identified by the Housing Element EIR.	As previously described, the Modified Project does not designate any new sites for development and would not result in any changes to the location or increase the intensity of future development. While the Modified Project would allow and encourage farmworker housing on agriculturally zoned land, this is required under State law. The Modified Project would not result in the development of farmworker housing on any site where it is not currently allowed by State law. Therefore, the Modified Project would not change the use of any farmland or forest land resources and would not conflict with agricultural zoning or Williamson Act contracts. The Modified Project would not result in any new potential impacts to agricultural and forest resources and would not increase the significance of any agricultural and forest resources impacts.
<u>Air Quality</u> <i>a through e) Would the project conflict with or obstruct implementation of the applicable air quality plan, violate or contribute to violation of an air quality standard, result in a cumulatively considerable net</i>	The Housing Element EIR identifies significant and unavoidable impacts to air quality associated with conflicts with regional clean air planning and increase in greenhouse gases emissions (See Addendum Appendix A, Impacts AIR-1 and AIR-2).	The Modified Project would not result in changes to the location or increase the intensity of development in comparison to the Approved Project. Therefore, the Modified Project would not result in development or changes to development patterns that would result in increased vehicle trips and associated air pollutant emissions, would not increase potential construction-related emissions, and would not designate areas for residential use that could expose sensitive receptors to substantial pollutant concentrations. The Modified Project would not result in any new potential air quality impacts and

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Environmental Issues	Approved Project Impacts	Modified Project Impacts
<i>increase of a non-attainment criteria pollutant, expose sensitive receptors to substantial pollutant concentrations, or create objectionable odors affecting a substantial number of people?</i>		would not increase the significance of any potential air quality impacts.
<u>Biological Resources</u> <i>a through f) Would the project cause a substantial adverse effect on special-status species, sensitive habitat, federally protected wetlands, wildlife movement corridors, local policies and ordinances adopted to protect biological resources, and adopted habitat or conservation plan?</i>	The Housing Element EIR identifies that impacts associated with biological resources, including impacts to special-status plant species, aquatic special-status animal species, nesting habitat for special-status bird species, sensitive habitats or natural communities, riparian habitat, wildlife movement corridors, and conflicts with policies for the protection of biological resources, would be reduced to less than significant with implementation of mitigation (see Addendum Appendix A, Impacts BIO-1 through BIO-6 and FIS-1 and Mitigation Measures BIO-1 through BIO-6 and FIS-1).	As previously described, the Modified Project would not result in changes to the location or increase the intensity of development in comparison to the Approved Project. Therefore, the Modified Project would not result in changes to potential development that would have an adverse effect on special-status species, result in impacts to sensitive habitats, including wetlands, or wildlife movement corridors, and would not interfere with local policies, ordinances, or plans adopted to protect biological resources. The Modified Project would not result in any new potential impacts to biological resources and would not increase the significance of any impacts to biological resources.
<u>Cultural Resources</u> <i>a through d) Would the project cause a substantial adverse change in the significance of a historical, archaeological, paleontological, or geologic resource or disturb human remains?</i>	The Housing Element EIR identifies a significant and unavoidable impact associated with demolition of the Basalt Shipyard (see Addendum Appendix A, Impact CUL-5 and Mitigation Measure CUL-5). The Housing Element EIR identified that impacts associated with the disturbance of unknown archaeological or paleontological resources, known lithic scatter, known prehistoric archaeological sites, potentially significant buildings, and human remains would be reduced to less than significant with implementation of mitigation (see Addendum	As previously described, the Modified Project does not designate any new sites for development and would not result in any changes to the location or increase the intensity of future development. The Modified Project would not result in any changes to potential development that would change potential impacts associated with the disturbance of historical, archaeological, paleontological, or geologic resources. The Modified Project would also not result in any changes that would change the potential to disturb human remains. The Modified Project would not result in any new potential impacts to cultural resources and would not increase the significance of any potential impacts to cultural resources.

TABLE 2: COMPARISON OF APPROVED PROJECT IMPACTS AND MODIFIED PROJECT IMPACTS

Environmental Issues	Approved Project Impacts	Modified Project Impacts
	Appendix A, Impacts CUL-1 through CUL-4 and CUL-6 and Mitigation Measures CUL-1 through CUL-4 and CUL-6). Measures CUL-2 through CUL-5).	
<u>Geology and Soils</u> <i>a through e) Would the project expose people or structures to potential substantial adverse effects associated with seismicity, geologic or soil instability, expansive soil, result in substantial soil erosion or loss, or have soils incapable of supporting septic or alternative wastewater disposal systems?</i>	The Housing Element EIR identifies a significant and unavoidable impact associated with increasing the population and structures exposed to seismic-related risk (see Addendum Appendix A, Impact GEO-2). The Housing Element EIR identifies that impacts associated with seismic ground-shaking and other geologic risks would be reduced to less than significant with implementation of mitigation (see Appendix A, Impact GEO-1 and Mitigation Measure GEO-1).	As previously described, the Modified Project does not designate any new sites for development and would not result in any changes to the location or increase the intensity of future development. The Modified Project would not result in any changes to development patterns that would change the potential for development to be exposed to geologic and soil hazards. As the Modified Project would not result in changes to development patterns, the Modified Project would also not result in impacts associated with soil erosion or septic/alternative wastewater issues. Therefore, the Modified Project would not result in any new potential impacts to geology and soils and would not increase the significance of any impacts to geology and soils.
<u>Greenhouse Gases</u> <i>a and b) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment or conflict with a plan, policy or regulation reducing greenhouse gas emission?</i>	The Housing Element EIR identifies significant and unavoidable impacts to air quality associated with conflicts with regional clean air planning and increase in greenhouse gases emissions (See Addendum Appendix A, Impacts AIR-1 and AIR-2).	As previously described, the Modified Project does not designate any new sites for development and would not result in any changes to the location or increase the intensity of future development. The Modified Project would not result in increased development or construction that would result in increased potential greenhouse gas emissions. Therefore, the Modified Project would not result in any new potential impacts to greenhouse gases and would not increase the significance of any impacts to greenhouse gases. However, the Modified Project does encourage energy-efficiency to a greater extent than the Approved Project, which may result in an indirect improvement to climate change and reduce the generation of greenhouses gasses over the long term.
<u>Hazards and Hazardous Materials</u> <i>a through h) Would the project create a significant hazard to the public or the environment through</i>	The Housing Element EIR identifies that impacts associated with potential hazardous materials contamination and exposure to wildland fire risks would be reduced to less than significant with implementation of mitigation (see Addendum Appendix A,	As previously described, the Modified Project does not designate any new sites for development and would not result in any changes to the location or increase the intensity of future development. Therefore, the Modified Project would not result in changes to development patterns or potential development that would create significant hazards associated with hazardous materials, wildland fires, aviation-

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Environmental Issues	Approved Project Impacts	Modified Project Impacts
<i>potential exposure to hazardous materials, wildland fires, or incidents associated with airplane facilities and uses, or conflict with implementation of plan adopted to address emergencies?</i>	Impacts HUM-1 through HUM-3 and Mitigation Measures HUM-1 through HUM-3).	related impacts, or conflicts with emergency response plans. Therefore, the Modified Project would not result in any new potential impacts to hazardous materials and would not increase the significance of any impacts to hazardous materials.
<u>Hydrology and Water Quality</u> <i>a through j) Would the project result in adverse environmental effects associated with water quality, waste discharge, drainage patterns, groundwater supplies, runoff, flood hazards, or other hydrological hazards?</i>	The Housing Element EIR identifies that impacts associated with groundwater supply and surface water supply would be reduced to less than significant with implementation of mitigation (see Addendum Appendix A, Impacts HYDRO-1 through HYDRO-3 and Mitigation Measures HYDRO-1 through HYDRO-3).	As previously described, the Modified Project does not designate any new sites for development and would not result in any changes to the location or increase the intensity of future development. As the Modified Project would not result in an increase in, or change in location of, potential development, the Modified Project would not result in pollutants, discharge or runoff that would affect waste discharge requirements or water quality, would not result in a change to potential drainage patterns or runoff, would not result in an increased demand for groundwater supplies, and would not expose people or structures to flooding or other hydrological hazards. Therefore, the Modified Project would not result in any new potential impacts to hydrology and water quality and would not increase the significance of any impacts to hydrology and water quality.
<u>Land Use and Planning</u> <i>a through c) Would the project physically divide an established community or conflict with any applicable land use plan, policy or regulation adopted for purpose of avoiding or mitigating an environmental effect?</i>	The Housing Element EIR identifies that impacts associated with land use, specifically conflicts with industrial uses and conflicts with the Union Pacific Railroad Line, would be reduced to less than significant with implementation of mitigation (see Addendum Appendix A, Impacts LU-1 and LU-2 and Mitigation Measures LU-1 and LU-2).	As previously described, the Modified Project does not designate any new sites for development and would not result in any changes to the location or increase the intensity of future development. Although the Modified Project may broaden the range of affordability levels and special needs population that may reside in future residential development in the County, projects designed for these populations will be required to comply with applicable land use policies adopted to avoid or mitigate environmental effects. The Modified Project would not result in any changes to land use designations or zoning and would not change the location or increase the intensity of potential future development. As such, the Modified Project would not result in the physical division of an established community. Therefore, the Modified Project would not result in any new potential impacts to land use and planning and would not increase the significance of any impacts to land use and planning.

TABLE 2: COMPARISON OF APPROVED PROJECT IMPACTS AND MODIFIED PROJECT IMPACTS

Environmental Issues	Approved Project Impacts	Modified Project Impacts
<u>Mineral Resources</u> <i>a and b) Would the project result in the loss of availability of a known mineral resource or recovery site?</i>	The Housing Element EIR does not identify any significant impacts to mineral resources.	As previously described, the Modified Project does not designate any new sites for development and would not result in any changes to the location or intensity of future development. As such, the Modified Project would not change the potential for development in locations with known or potential mineral resources. The Modified Project would not change the potential for loss of availability of a known mineral resource or recovery site. Therefore, the Modified Project would not result in any new potential impacts to mineral resources and would not increase the significance of any impacts to mineral resources.
<u>Noise</u> <i>a through f) Would the project result in noise levels in excess of standards, a substantial temporary, periodic, or permanent increase in ambient noise levels, or exposure to excessive noise associated with an airport or airstrip?</i>	The Housing Element EIR identifies significant and unavoidable impacts associated with increased traffic noise (see Addendum Appendix A, Impact NOISE-4). The Housing Element EIR identifies that impacts associated with construction noise, groundborne vibration, and aircraft noise would be reduced to less than significant with mitigation (see Addendum Appendix A, Impacts NOISE-1 through NOISE-3 and Mitigation Measures NOISE-1 through NOISE-3).	As previously described, the Modified Project does not designate any new sites for development and would not result in any changes to the location or increase the intensity of future development. As the Modified Project would not change the location or increase the intensity of potential development, the Modified Project would not change potential traffic noise patterns, result in new potential noise sources (including construction noise), or result in changes to ambient noise levels. Therefore, the Modified Project would not result in any new potential noise impacts and would not increase the significance of any noise impacts.
<u>Population/Housing</u> <i>a through c) Would the project induce substantial population growth or displace substantial numbers of housing or people?</i>	The Housing Element EIR identifies significant and unavoidable impacts associated with population and housing due the potential to increase population in excess of regional projections and in excess of the Growth Management System (see Addendum Appendix A, Impacts POP-1 and POP-2).	As previously described, the Modified Project does not designate any new sites for development and would not result in any changes to the location or increase the intensity of future development. The Housing Element EIR anticipated development of sites designated for residential development, which included 93.8 acres of land. The Modified Project does not identify any new sites for development. The Modified Project anticipates a lower rate of development than the Approved Project, identifying a new construction need of 180 units. This is well within the units analyzed in the Housing Element EIR and the Modified Project would not result in any increase in population growth beyond that anticipated in the Housing Element EIR. As no new sites are identified for development, the Modified Project will not have an effect on the potential to displace substantial amounts of housing or people. Therefore, the Modified Project would not result in

TABLE 2: COMPARISON OF APPROVED PROJECT IMPACTS AND MODIFIED PROJECT IMPACTS

Environmental Issues	Approved Project Impacts	Modified Project Impacts
		any new potential impacts to population and housing and would not increase the significance of any impacts to population and housing.
<u>Public Services</u> <i>a through e) Would the project have an effect upon, or generate a need fire protection, police services, parks, schools, or other public facilities?</i>	The Housing Element EIR identifies that impacts associated with public services, including a new fire station and two new sheriff substations, would be reduced to less than significant with implementation of mitigation (see Addendum Appendix A, Impacts PUB-1 through PUB-34 and Mitigation Measures PUB-1 through PUB-34).	As previously described, the Modified Project does not designate any new sites for development and would not result in any changes to the location or increase the intensity of future development. The Modified Project identifies a need for less housing than was addressed in the Housing Element EIR. As the Modified Project would not result in an increase in development potential in comparison to the Approved Project, the Modified Project would not result in any change in the demand for public services. Therefore, the Modified Project would not result in any new potential impacts to public services and would not increase the significance of any impacts to public services.
<u>Recreation</u> <i>a and b) Would the project result in substantial physical deterioration of recreational facilities or require construction or expansion of recreational facilities that may have an adverse physical effect on the environment?</i>	The Housing Element EIR does not identify any significant impacts associated with park and recreation facilities.	As previously described, the Modified Project does not designate any new sites for development and would not result in any changes to the location or increase the intensity of future development. As the Modified Project would not result in a change in development potential, there would be no increase in population associated with the Modified Project that would result in any new or increased impacts related to the deterioration of recreational facilities or require construction or expansion of recreational facilities.
<u>Transportation/Traffic</u> <i>a through g) Would the project conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, conflict with an applicable congestion management program, result in a change in air traffic patterns, increase roadway hazards, result in inadequate emergency access or parking capacity, or conflict with</i>	The Housing Element EIR identifies significant and unavoidable impacts associated with operations at the intersection of 1 st Street/Soscol Avenue and increases in vehicle traffic under cumulative conditions (see Addendum Appendix A, Impacts TRAF-11 and TRAF-14 and Mitigation Measures TRAF-11 and TRAF-14). The Housing Element EIR identifies that impacts to various intersections and conflicts related to planning for alternative transportation would be reduced to less than significant with mitigation, (see Addendum Appendix A, Impacts TRAF-3 through TRAF-13 and Mitigation Measures	As previously described, the Modified Project does not designate any new sites for development and would not result in any changes to the location or increase the intensity of future development. The Modified Project does not accommodate any increase in housing need or development. Therefore, the Modified Project would not result in an increase in users of the transportation system and thus would not increase vehicle trips. In addition, the Modified Project would not result in impacts associated with emergency access and alternative transportation in comparison to the Approved Project, because it does not identify any additional locations for development and would not increase development potential. Therefore, the Modified Project would not result in any new potential transportation and traffic impacts and would not increase the significance of any transportation and traffic impacts.

TABLE 2: COMPARISON OF APPROVED PROJECT IMPACTS AND MODIFIED PROJECT IMPACTS

Environmental Issues	Approved Project Impacts	Modified Project Impacts
<i>adopted policies or programs supporting alternative transportation?</i>	TRAF-3 through TRAF-13).	
<u>Utilities/Service Systems</u> <i>a through g) Would the project exceed wastewater treatment requirements or capacity, require the construction or expansion of utility facilities that would result in a significant environmental effects, be served by a landfill with sufficient capacity, and comply with applicable statutes and regulations related to solid waste?</i>	The Housing Element EIR identifies that impacts associated with wastewater capacity would be reduced to less than significant with implementation of mitigation (see Addendum Appendix A, Impact PUB-4 and Mitigation Measure PUB-4) and did not identify any significant impacts associated with other utility facilities or solid waste.	As previously described, the Modified Project does not designate any new sites for development and would not result in any changes to the location or increase the intensity of future development. The Modified Project identifies a need for less housing than was addressed in the Housing Element EIR. As the Modified Project would not result in an increase in development potential in comparison to the Approved Project, the Modified Project would not result in any change in the demand for utilities or service systems. Therefore, the Modified Project would not result in any new potential impacts to utilities and service systems and would not increase the significance of any impacts to utilities and service systems.
<u>Cumulative Effects</u> <i>Does the project have impacts that are individually limited, but cumulatively considerable?</i>	The Housing Element EIR identified significant and unavoidable cumulative impacts associated with population growth, traffic (intersection operations at 1 st Street/Soscol Avenue and increased traffic on roadway segments), increased noise levels, conflicts with air quality planning, greenhouse gas emissions, structures at risk of seismic ground shaking, effects on cultural resources, (see Addendum Appendix A, Impacts POP-2, TRAF-11, TRAF-14, NOISE-4, AIR-1, AIR-2, GEO-2, and CUL-5 and Mitigation Measures TRAF-1, TRAF-14, and CUL-5). The Housing Element EIR identified less than significant cumulative impacts associated with traffic at various intersections, and sheriff facilities (see Addendum Appendix A, Impacts POP-2, TRAF-	The Modified Project would not change the location of or increase the intensity or density of future development. Further, the Modified Project identifies a reduced housing need (180 units) in comparison to the Approved Project (569 units). As the Modified Project would not result in an increase in development nor result in any changes in the location, intensity, or density of future development, the Modified Project would not result in any new environmental impacts and would not increase the significance of environmental impacts in comparison to the Approved Project, as described under previous impact discussions. Therefore, the Modified Project would not contribute to an increase in cumulative impacts or result in any new cumulative impacts in comparison to the Approved Project.

TABLE 2: COMPARISON OF APPROVED PROJECT IMPACTS AND MODIFIED PROJECT IMPACTS

Environmental Issues	Approved Project Impacts	Modified Project Impacts
	1 through TRAF-3, TRAF-5 through TRAF-10, TRAF-12, TRAF-13, and PUB-3, and Mitigation Measures TRAF-1 through TRAF-3, TRAF-5 through TRAF-10, TRAF-12, TRAF-13, and PUB-3).	

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IMPACT NUMBER	IMPACT STATEMENT	MITIGATION MEASURES
<i>SIGNIFICANT AND UNAVOIDABLE IMPACTS</i>		
POP-1	The housing programs and sites included in the proposed Housing Element could generate units potentially in excess of ABAG population projection for 2015. Because there are no feasible measures to mitigate this impact to a less-than-significant level, this impact is significant and unavoidable.	None feasible.
POP-2	The proposed Housing Element would contribute to the General Plan's significant and unavoidable cumulative impact resulting from exceeding ABAG's regional population projections and the County's 1 percent population growth standard derived from the Growth Management System. Because there are no feasible measures to mitigate this impact to a less-than-significant level, the proposed project contributes to a significant and unavoidable cumulative impact.	None feasible.
TRAF-11	Operations at the signalized intersection of 1st Street/Soscol Avenue (Intersection 10) would degrade from an acceptable LOS B to an unacceptable LOS F during the PM peak traffic hour under Cumulative (Year 2030) conditions.	<u>TRAF-11:</u> The only possible solution for this cumulative impact would be to construct a third through lane on both the northbound and southbound approaches of Soscol Avenue, including widening of newly-constructed bridge structures to the north and south of the intersection. Widening Soscol Avenue beyond a four-lane roadway would be in direct conflict with the City of Napa's General Plan and widening of the new bridge structures is not considered reasonable or feasible.
TRAF-14	The proposed Housing Element would contribute significant levels of vehicular traffic to roadway segments identified in the General Plan EIR as operating at an unacceptable level of service with cumulative traffic in Year 2030. In addition, development on the Napa Pipe site may significantly increase delays and/or contribute to significant cumulative delays at intersections not selected for analysis in this EIR.	<u>TRAF-14:</u> The County shall require site-specific evaluation and project-specific analysis of the Napa Pipe project prior to approval of a development agreement. The analysis shall extend beyond the intersections included in this program-level EIR to include all road segments and intersections that may be significantly impacted, and the developer shall be required to mitigate impacts as feasible. Potential impacts and mitigation measures are expected to resemble those outlined in the draft transportation study for the project cited in this EIR, although the feasibility of mitigation has not been determined yet, and this impact is therefore considered significant and unavoidable.
NOISE-4	The proposed Housing Element Update would contribute to a cumulatively considerable increase in traffic noise along roadways in the county.	None feasible
AIR-1	The proposed Housing Element Update would conflict with regional clean air planning efforts, since population and vehicle miles traveled would increase at a greater rate than projections used for air quality planning. The projected growth could lead to an increase in the region's VMT, contributing to the on-going air quality issues in the Bay Area. In addition, the proposed Housing Element Update would contribute to a cumulatively significant impact related to conflicts with regional clean air planning efforts because population and vehicle miles traveled will be greater than projections used for air quality planning under the General Plan.	None feasible.
AIR-2	Implementation of the proposed Housing Element Update would contribute to an increase in GHG emissions from vehicle transportation and building energy use, contributing to increases in atmospheric GHG concentrations that lead to global warming. The proposed project would also contribute to a cumulatively significant impact under the General Plan related to GHG emissions.	None feasible.
GEO-2	The Housing Element would increase the county's population and the number of structures with a	None feasible.

APPENDIX A: 2009 HOUSING ELEMENT EIR: ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

IMPACT NUMBER	IMPACT STATEMENT	MITIGATION MEASURES
	potential for seismic-related risk. Thus the proposed Housing Element would have a cumulatively considerable impact related to seismic-related ground shaking and ground failure.	
CUL-5	The construction of housing on the Napa Pipe sites would result in the demolition of the Basalt Shipyard, a significant historic architectural resource, which would contribute to a cumulatively significant impact from the General Plan.	<u>CUL-5:</u> The Basalt Shipyard shall be evaluated for potential inclusion on the California Register, and if found eligible shall be photo-documented to the Historic American Buildings Survey (HABS) standards. Removal of this significant architectural resource would remain significant and unavoidable.
VIS-1	Moskowite Corner Sites A and B are part of scenic vistas and visible from County-designated scenic routes. Due to the flat topography, new development could not be screened without blocking the scenic vista or viewshed of Highway 128. No feasible mitigation measure was identified to reduce this impact. Therefore, the impact of developing on Moskowite Corner Sites A and B is significant and unavoidable.	None feasible.
POTENTIALLY SIGNIFICANT AND SIGNIFICANT IMPACTS THAT ARE REDUCED TO LESS THAN SIGNIFICANT AFTER MITIGATION		
LU-1	Proposed residential land uses on the Napa Pipe sites could conflict with adjacent industrial uses.	<u>LU-1:</u> In compliance with Action Item AG/LU-94.1 of the Napa County General Plan, future development on the Napa Pipe sites will be required to include design features to buffer proposed residential uses from industrial uses. Such features shall include, but are not limited to: • Buffering and visual screening from existing industrial uses. • Design features that include physical buffers and design features, such as vegetation, landscape features and walls. • Building placement and orientation that physically separates new development from incompatible operations of adjacent uses, such as truck traffic, odors and stationary noise sources. • Measures to address noise and vibration.
LU-2	Proposed land uses on the Napa Pipe sites could conflict with the existing Union Pacific Railroad line bisecting the project site	<u>LU-2:</u> The Napa Pipe developer and the County will coordinate with staff from the Public Utilities Commission and Union Pacific to identify desired railroad crossings and implement required safety equipment and improvements. Requirements may include signs, audible signals, gates that close when a train approaches and fencing along other sections of the right of way. These or other, similar required improvements will be installed by the developer during construction of roads and other infrastructure on site. The developer will be responsible for making any modifications that are needed to existing crossings, and for constructing new crossings acceptable to the Public Utilities Commission.
TRAF-1	Project-related traffic would increase the V/C ratio by more than 5 percent at the unsignalized intersection of Deer Park Road/Silverado Trail (Intersection 3) during the AM peak hour under Year 2015 and Cumulative (Year 2030) conditions. Unsignalized intersection operations would degrade from an acceptable LOS C to an unacceptable LOS E in Year 2015 and LOS F in Cumulative (Year 2030) during the PM peak traffic hour due to project related traffic.	<u>TRAF-1:</u> The County Public Works Department shall monitor operation of the intersection of Deer Park/Silverado Trail and convert the traffic signal equipment already installed at this intersection to operate as a standard traffic signal when warranted by delays. At the same time, each intersection approach shall be re-striped and/or reconfigured to provide, at a minimum, separate left turn lanes and combined through/right-turn lanes.
TRAF-2	Project-related traffic would increase the V/C ratio by more than 5 percent at the unsignalized intersection of St. Helena Highway (State Route 29)/Rutherford Road (State Route 128) (Intersection 4) during both the AM and PM peak hours under Year 2015 and Cumulative (Year 2030) conditions.	<u>TRAF-2:</u> The intersection of State Route 29/State Route 128 in Rutherford shall be signalized, or improved with an alternate configuration to provide acceptable operations prior to 2015. The final configuration will be determined by Caltrans in consultation with the County Traffic Engineer and will be based on actual volumes and conditions at the intersection. As a State highway, State Route 29 is under Caltrans jurisdiction.

APPENDIX A: 2009 HOUSING ELEMENT EIR: ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

IMPACT NUMBER	IMPACT STATEMENT	MITIGATION MEASURES
TRAF-3	Operations at the unsignalized intersection of Trancas Street/Monticello Road (State Route 121)/Silverado Trail (State Route 121) (Intersection 8) would degrade from an acceptable LOS D during the AM peak traffic hour and LOS C during the PM peak traffic hour to an unacceptable LOS F during both the AM and PM peak traffic hours under Year 2015 and Cumulative (Year 2030) conditions. Project-related traffic would increase the V/C ratio by more than 5 percent at this intersection.	<u>TRAF-3:</u> The County Public Works Department shall monitor operations at the intersection of Trancas/Monticello Road/Silverado Trail and shall provide for signalization or other improvements in order to provide acceptable operations (LOD D or better) as needed before 2030. The intersection contains a Caltrans controlled facility.
TRAF-4	Project-related traffic would increase the V/C ratio by more than 5 percent at the signalized intersection of Imola Avenue (State Route 121)/Soscol Avenue (State Route 121/221) (Intersection 12) during both the AM and PM peak hours under Year 2015 conditions.	<u>TRAF-4:</u> The intersection of Imola/Soscol (State Route 121 and 121/221) shall be reconstructed to provide an additional left-turn lane on the eastbound approach, an exclusive right-turn lane on the westbound approach, and an additional through lane on Soscol Avenue in both directions. Right-of-way acquisition may be required as part of this widening.
TRAF-5	Project-related traffic would increase the V/C ratio by more than 5 percent at the signalized intersection of Imola Avenue (State Route 121)/Soscol Avenue (State Route 121/221) (Intersection 12) during both the AM and PM peak hours under Cumulative (Year 2030) conditions.	<u>TRAF-5:</u> To achieve baseline conditions operations (LOS F) under Year 2030 conditions at the intersection of Imola/Soscol (State Route 121 and 121/221), the following configuration shall be constructed: • Northbound: two left-turn, three through, and one right-turn lane • Southbound: two left-turn, three through, and one right-turn lane • Eastbound: one left-turn, two through, and one right-turn lane (right-turn lane shall have overlap phasing during the AM peak hour) • Westbound: one left-turn, two through, and one right-turn lane
TRAF-6 and 7	Operations at the signalized intersection of Carneros Highway (State Route 121)/Sonoma Highway (State Route 12/ State Route 29) (Intersection 13) would degrade from LOS D to LOS F under Year 2015 conditions during both the AM and PM peak hours and project-related traffic would increase the V/C ratio by more than 5 percent. Also, operations would degrade from LOS D to LOS F under Cumulative (Year 2030) conditions during both the AM and PM peak hours, with project-related traffic increasing the V/C ratio by more than 5 percent.	<u>TRAF-6 and 7:</u> A second eastbound right-turn lane shall be constructed at the intersection of State Route 12/ State Route 29 prior to 2015 to achieve acceptable operations at this intersection and additional northbound and southbound through lane shall be constructed prior to 2030 if necessary to maintain acceptable operating conditions. As a State highway, State Route 29 is under Caltrans jurisdiction.
TRAF-8	Project-related traffic would increase the V/C ratio by more than 5 percent at the signalized intersection of Sonoma Highway (State Route 12)/State Route 29/Napa Vallejo Highway (State Route 221) (Intersection 14) during both the AM and PM peak hours under Year 2015 and Cumulative (Year 2030) conditions.	<u>TRAF-8:</u> Construct a southbound left-turn fly-over at the intersection of State Route 12/29 and State Route 221 and restrict the movements made at the at-grade intersection to the following: • Northbound and southbound right-turns • Eastbound and westbound through and right-turns
TRAF-9	Operations at the signalized intersection of Jameson Canyon Road (State Route 12)/State Route 29 (Intersection 15) would degrade from an acceptable LOS D to LOS F in the PM peak hour under Year 2015 and Cumulative (Year 2030) conditions. Project-related traffic would increase the V/C ratio by more than 5 percent in the AM peak hour for the intersection currently operating at an unacceptable LOS F.	<u>TRAF-9:</u> The intersection of State Route 12 and State Route 29 shall be reconstructed as a grade-separated interchange as proposed in the Napa County General Plan. Construction of this interchange would improve operations at this location to acceptable levels and would reduce the project's impact to a less-than-significant level. As a State highway, State Route 29 is under Caltrans jurisdiction.
TRAF-10	Operations at the signalized intersection of 1st Street/Silverado Trail (State Route 121) (Intersection 9) would degrade from an acceptable LOS B to an unacceptable LOS F during the PM peak traffic hour under Cumulative (Year 2030) Conditions.	<u>TRAF-10:</u> The intersection of 1 st Street/Silverado Trail in the City of Napa shall be improved by constructing a second southbound through lane on Silverado Trail (State Route 121). Widening Silverado Trail at this location beyond a two-lane roadway would be in direct conflict with the City of Napa's General Plan and would require City approval following a General Plan amendment.

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IMPACT NUMBER	IMPACT STATEMENT	MITIGATION MEASURES
TRAF-12	Operations at the signalized intersection of Soscol Avenue/Silverado Trail (State Route 121) (Intersection 11) would degrade from an acceptable LOS C in the AM peak hour and LOS B in the PM peak hour to an unacceptable LOS E during both the AM and PM peak traffic hours under Cumulative (Year 2030) conditions.	<u>TRAF-12:</u> The intersection of Soscol/Silverado Trail shall be reconstructed to include an exclusive westbound left-turn lane while maintaining the shared left/right-turn lane. This would achieve an acceptable LOS C during both the AM and PM peak hours.
TRAF-13	The proposed Housing Element Update would conflict with adopted policies, plans or programs supporting alternative transportation because the remote locations of the housing sites and the lack of alternative transportation facilities in these remote locations would not promote the use of bicycle, pedestrian, or transit facilities.	<u>TRAF-13:</u> The County shall work with VINE to establish transit stops, within ¼-mile of each proposed housing site, either by rerouting existing transit routes or by establishing new routes, prior to occupancy of the units. Alternatively, park-and-ride areas shall be provided near the sites. In addition, adequate bicycle and pedestrian connections shall be provided to these transit stops and adjacent land uses. Class II bicycle lane striping or Class III shared roadway signage shall be added to roadways connecting housing sites to employment or retail centers.
BIO-1	Angwin Sites A and B, Moskowite Corner Sites A, B, C and D, and Spanish Flat Sites B, D, E and F may contain special-status plant species which, if extant, may be negatively affected by housing development.	<u>BIO-1:</u> Prior to issuance of a building permit for development on Angwin Sites A and B, Moskowite Corner Sites A, B, C and D, and Spanish Flat Sites B, D, E and F, the County shall ensure that the property owner or developer retains a qualified biologist to undertake confirmation surveys for special-status plant species. Detailed surveys shall be conducted during the flowering period by a qualified botanist to confirm absence of any special-status plant species from the vicinity of proposed improvements. The surveys shall be conducted consistent with the latest surveys guidelines of the CDFG, and include sufficient field surveys to allow for a determination on presence or absence. If populations of any special-status plant species are encountered on any site, housing development on the site shall be designed to avoid the identified populations in compliance with State and federal law.
BIO-2	Angwin Site A, Moskowite Corner Sites A, B and C, Spanish Flat Sites C, D and F and Napa Pipe Sites A and B may contain aquatic special-status animal species that could be affected by housing development.	<u>BIO-2:</u> Prior to issuance of a building permit for development on Angwin Site A, Moskowite Corner Sites A, B and C, Spanish Flat Sites C, D and F, and Napa Pipe Sites A and B, the County shall ensure that the property owner or developer retains a qualified biologist to undertake confirmation surveys for aquatic special-status animal species shall be conducted on the sites listed above. Detailed surveys shall be conducted by a qualified biologist to confirm absence of any aquatic special-status animal species from the vicinity of proposed improvements. This may include conduct of protocol surveys for California red-legged frog if development is proposed within 300 feet of potential breeding or dispersal habitat is present, which is possible on Angwin Site A, Moskowite Corner Sites A, B and C, and Spanish Flat Sites C and D. If populations of any aquatic special-status animal species are encountered on any site, housing development on the site shall be designed to avoid the identified populations and habitat in compliance with State and federal law.
BIO-3	Angwin Sites A and B, Moskowite Corner Sites A, B, C and D, Spanish Flat Sites B, D, E and F and Napa Pipe Sites A and B may contain nesting habitat for special-status bird species that could be affected by housing development.	<u>BIO-3:</u> Prior to issuance of a building permit for development on Angwin Sites A and B, Moskowite Corner Sites A, B, C and D, Spanish Flat Sites B, D, E and F, and Napa Pipe Sites A and B, the County shall ensure that the property owner or developer retains a qualified biologist to undertake pre-construction nesting surveys for special-status bird species shall be conducted on the sites listed above. The pre-construction nesting surveys shall be conducted for loggerhead shrike, burrowing owl, and tree nesting raptors at sites with a potential for nesting activity if earthmoving and construction is to be initiated during the months of April through August. The surveys shall be conducted by a qualified biologist no more than 30 days prior to initiation of grading. If any special status raptor nests are found during pre-construction surveys, a 500-foot no-disturbance buffer will be created around the nest during the breeding season or until all young have fledged. If nests of other special status birds are found during pre-construction surveys, a 250-foot buffer zone will be created consistent with California Department of Fish and Game avoidance guidelines. If preconstruction surveys determine that special status species are absent, no further mitigation is required. If construction activities are suspended for more than two weeks, the area must be resurveyed.

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IMPACT NUMBER	IMPACT STATEMENT	MITIGATION MEASURES
BIO-4	On Angwin Sites A and B, Moskowite Corner Sites A, B, C and D, Spanish Flat Sites B, C, D, E and F, and Napa Pipe Sites A and B, proposed development could affect sensitive habitats or natural communities unless they are adequately protected.	<u>BIO-4:</u> Prior to issuance of a building permit for development on Angwin Sites A and B, Moskowite Corner Sites A, B, C and D, Spanish Flat Sites B, C, D, E and F, and Napa Pipe Sites A and B, the County shall ensure that the property owner or developer retains a qualified biologist to accurately map locations supporting sensitive habitats and natural communities and that development plans for individual sites, and construction on these sites, avoids these locations. If sensitive habitats and natural communities include wetlands, off-site restoration with approval from the US Army Corps of Engineers may occur in place of avoiding development on wetlands.
BIO-5	Proposed development on Angwin Sites A and B, Moskowite Corner Sites A, B, C and D, Spanish Flat Sites B, C, D, E and F, and Napa Pipe Sites A and B could result in the obstruction of wildlife movement corridors.	<u>BIO-5:</u> Prior to issuance of a building permit for development on Angwin Sites A and B, Moskowite Corner Sites A, B, C and D, Spanish Flat Sites B, C, D, E and F, and Napa Pipe Sites A and B, the County shall ensure that the property owner or developer retains a qualified biologist to survey possible wildlife movement corridors. If native resident or migratory wildlife corridors are found to be used on the site, measures to minimize restricted wildlife movement shall be developed in consultation with a qualified biologist, such as development and fencing restrictions, road design and use of culverts. In addition, measures shall be tailored to the needs of the species that are found to use the corridor.
BIO-6	Proposed development on Angwin Sites A and B, Moskowite Corner Sites A, B, C and D, Spanish Flat Sites B, C, D, E and F, and Napa Pipe Sites A and B could conflict with a number of policies in the Conservation Element intended to protect biological resources, including policies to protect native vegetation, sensitive wildlife habitat and mature oaks.	Implement Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4 and BIO-5.
FIS-1	Future development on Angwin Site A; Moskowite Corner Sites A, B and C; and Spanish Flat Site F could adversely affect riparian habitat.	<u>FIS-1:</u> Compliance with the County's conservation regulations and Mitigation Measure BIO-4 would ensure that during preparation of development plans for individual sites, locations supporting riparian vegetation are accurately mapped, and that development avoids these areas.
NOISE-1	At Angwin Sites A and B, Moskowite Corner Sites A, B and C, and Napa Pipe Sites A and B, the Housing Element Update would allow residential units to be constructed where noise levels would exceed the Napa County Noise and Land Use Compatibility Standards or the Napa County Noise Ordinance limits.	<u>NOISE-1:</u> Sound-rated building construction shall be used to achieve acceptable indoor noise levels in units proposed in Angwin Sites A and B, Moskowite Corner Sites A, B and C, and Napa Pipe Sites A and B. The specification of these treatments shall be developed during the architectural design of the buildings. In general, rooms along the perimeter of the site shall require sound rated windows. All residential units in the project shall require mechanical ventilation to allow for air circulation while windows are closed for noise control.
NOISE-2	Housing development on Napa Pipe Sites A and B would be constructed in the vicinity of a railroad and a quarry, potentially exposing sensitive uses to groundborne vibration.	<u>NOISE-2a:</u> Consistent with General Plan Policy CC-40, residences proposed within 100 feet of any significant source of groundborne vibration, a vibration study shall be conducted prior to construction by a qualified consultant to ensure that residents would not be exposed to excessive vibration levels that be disruptive (e.g. potential to interrupt sleep) or cause structural damage. The results of the study shall include performance standards to fully mitigate vibration impacts, which may take the form of building setbacks, site design, soil compaction/grouting, and other appropriate methods. <u>NOISE-2b:</u> Residences proposed within proximity of the Syar Quarry or haul roads leading to the Syar Quarry shall be buffered and constructed to avoid significant disturbance related to groundborne vibration (e.g. potential to interrupt sleep or cause structural damage). A vibration study shall be conducted by a qualified consultant prior to construction to determine the extent of the buffer and other required measures related to building/foundation design. Prior to issuance of a building permit, the property owner shall demonstrate how study recommendations will be implemented to fully mitigate vibration impacts.
NOISE-3	At Angwin Site B, the Housing Element Update would allow residential units to be constructed where aircraft noise levels would exceed the Napa County Noise and Land Use Compatibility Standards or interior intermittent noise level limits.	<u>NOISE-3:</u> An aviation easement shall be recorded for all new residential development, informing future residents of the presence of the airport and its potential for creating current and future noise.

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IMPACT NUMBER	IMPACT STATEMENT	MITIGATION MEASURES
HUM-1	Spanish Flat Sites B and F are listed with the County as contaminated with hazardous materials. Construction of housing on these sites could constitute a significant impact.	<u>HUM-1:</u> Prior to development approval, construction at these sites shall be subject to Phase I and Phase II studies. Any contamination shall be cleaned up and disposed of as per local, State and federal law.
HUM-2	The Napa Pipe sites are currently listed by the California Department of Toxic Substances Control as a leaking underground fuel tank site as well as a spill, leak, investigation or cleanup site. A soil and groundwater investigation has been conducted and a remediation action plan (RAP) was developed under the supervision of the San Francisco Bay Regional Water Quality Control Board. Until implementation of the RAP has been completed, the project would result in a significant impact creating a hazard to the public or environment.	<u>HUM-2:</u> Prior to construction, the property owner and/or developer shall implement the approved Remedial Action Plan consistent with the Remedial Design and Implementation Plan, and obtain clearance from the Regional Water Quality Control Board. These measures would ensure that construction activities and site reuse are carried out in a manner that addresses environmental and human health risks associated with contaminated soil and groundwater.
HUM-3	Future housing development under the programs and policies of the proposed Housing Element and on the Angwin, Moskowitz Corner and Spanish Flat sites has the potential to expose people or structure to risks involving wildland fires.	<u>HUM-3:</u> Prior to issuance of a building permit for development on the Angwin, Moskowitz Corner and Spanish Flat sites, the County shall ensure that the following conditions will be met to address potential risks involving wildland fires: - Fire apparatus access roads shall have an unobstructed width of not less than 20 feet and an unobstructed vertical clearance of not less than 15 feet. These roadway widths allow for traffic to travel in both directions on the roadway but do not allow for parking. If parking is allowed on only one side of the roadway, the width shall be 30 feet, and parking on both sides of the roadway requires the roadway to be 40 feet wide. - Fire department access roads shall be provided to within 150 feet of all portions of all structures. - Two means of access/egress shall be provided for any development that serves 25 or more sites. - Dead end fire apparatus access roads in excess of 150 feet in length shall be provided with approved provisions for the turning around of fire apparatus. - Fire department access roads shall comply with the Napa County Road and Street Standards for road surface, turning radius, grade and marking. - Proposed developments located in a Very High Fire Hazard Severity Zone shall use Class-A rated roofing materials on all structures. - A comprehensive Vegetation Management Plan (VMP) shall be developed and submitted to the Napa County Fire Marshal's Office and the California Department of Forestry for approval for developed lands. This VMP shall include fuel modification, treatment zones, methods of treatment, maintenance and responsibility. Prior to the start of fire season every year, the owner of the development would be required to verify to the Fire Department compliance with the approved VMP. - Development approvals for residential development projects, serving 11 to 350 parcels or sites, shall provide 1,000 gallons per minute for a two-hour flow duration totaling 120,000 gallons of water storage to be available only for fire fighting operations. The Fire Department is willing to accept automatic fire sprinkler systems installed and maintained to the National Fire Protection Association (NFPA) Standard 13-D (Sprinkler Systems in One- and Two-Family Dwellings) throughout all of the residences as an alternate methods or material request. - The private fire service mains shall be installed and maintained in accordance to the National Fire Protection Standard #24 (Installation of Private Fire Service Mains and Their Appurtenances 2007 edition). Fire service mains shall be a minimum of 6 inches in diameter, listed for fire protection use, and in compliance with American Water Works Association standards.

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		j. The location, number and type of fire hydrants connected to the water supply shall be in accordance with the California Fire Code, 2007 edition. All hydrants shall have two 2½-inch National Hose male connections and one 4½-inch National Hose male connection. Hydrants shall be spaced 500 feet apart with a maximum travel distance of 250 feet to any hydrant. k. The approved address numbers shall be placed on each building in such a position as to be plainly visible and legible from the street fronting the property. The address numbers shall be a minimum of 3 inches in size, visible from both directions on the road fronting the property, reflective and contrasting in color with the background. l. The development approval shall have a written evacuation plan approved by the Napa County Fire Marshal's Office and shall post the fire safety rules and regulations with the evacuation plan. m. Technical assistance in the form of a fire protection engineer or consultant acceptable, and reporting directly, to the NCFD shall be provided by the applicant at no charge to the County (California Fire Code section 103.1.1) for the independent peer review of alternate methods proposals. n. Plans detailing compliance with the fire and life safety conditions-of-approval shall be submitted to the Napa County Fire Marshal's Office for review and approval prior to building permit issuance and/or as described above.
GEO-1	Housing developed on any of the proposed housing sites could result in the exposure of people, structures and/or property to seismic ground shaking or other geologic risks.	<u>GEO-1:</u> Consistent with Napa County General Plan Policy SAF-8, prior to development of all housing sites, a design-level geotechnical report shall be prepared by a qualified geotechnical engineer and engineering geologist. The report shall include a detailed geologic map showing all landslides, fill areas, erosion areas, faults and other pertinent geologic and seismic features. The report shall include recommendations for fill placement, cut and fill slope inclinations, slope stabilization, old fill mitigation, liquefaction mitigation, earthquake design criteria, treatment of expansive soils and surface and subsurface drainage. In addition, the report shall provide design criteria for facilities such as retaining walls, pavements, and foundations. The report shall be based on adequate subsurface investigation. At a minimum, subsurface investigations shall be conducted in all areas where cut or fill slopes greater than ten feet in vertical height are planned. Potentially unstable slopes shall be mitigated such that the risk of in-stability during the life of the project is very low. Slope instability can be effectively mitigated through the use of relatively flat slopes, retaining walls, or reconstructing slopes with compacted fill. Specific measures shall be included in the design-level geotechnical report. It may be desirable to divide the geotechnical investigations into planning-level and design-level phases. At a minimum, the planning-level phase shall be completed prior to approval of the Tentative Map. The design-level report shall be completed prior to approval of the final grading plan. Cut and fill slopes shall be constructed in accordance with modern geotechnical standards, including the County grading ordinance and the International Building Code. The applicable standards shall be those in effect at the time the grading plan accepted by the County. A geotechnical engineer shall sign improvement plans and approve them as conforming to their recommendations prior to parcel/final map approval. The geotechnical engineer shall also assume responsibility for inspection of the work and shall certify to the County, prior to acceptance of the work that the work performed is adequate and complies with its recommendations. Additional soils information may be required by the Chief Building Inspector during the plan check of individual building plans in accordance with the International Building Code and California Building Code.

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HYDRO-1	Within the Milliken-Sarco-Tulucay (MST) groundwater deficient area, new second units, new units accessory to commercial uses, and new units permitted as a result of re-designation of 60 parcels in the Monticello Road area from RR to UR could exacerbate groundwater problems.	<u>HYDRO-1:</u> To avoid exacerbating existing groundwater deficiencies, property owners seeking approval for new second units, accessory units or subdivisions within the MST as a result of Housing Element policies and programs shall be required to demonstrate the availability of municipal water supplies, or to demonstrate that potential groundwater use will be fully off-set by reductions in the use of groundwater elsewhere on the affected parcel(s).
HYDRO-2	New development on the Angwin sites that relies on the PUC groundwater system conflicts with General Plan Policy AG/LU-61, which prevents a net increase of groundwater use within the Conn-Creek-Upper Reach Local Drainage. In addition, there is insufficient data available to determine whether there is adequate groundwater supply.	<u>HYDRO-2:</u> To comply with General Plan Policy AG/LU-61, the County shall require use of groundwater on the Angwin sites to be fully offset elsewhere in the Conn-Creek-Upper Reach Local Drainage by implementing water conservation strategies – such as using low-flow toilets, fixing leaky pipes and using reclaimed water for irrigation purposes – or other strategies to decrease the use of groundwater associated with existing activities in the watershed. Alternatively, the developer may demonstrate that the project would have no impact on the long term sustainability of groundwater supplies by providing monitoring data and technical analyses or by providing evidence of an alternative water source prior to issuance of a building permit.
HYDRO-3	Although new development on the Moskowitz Corner sites would rely on surface water from the Moskowitz Reservoir, it is not certain whether the availability and reliability of the surface water supply from the Moskowitz Reservoir will be sufficient to support the proposed housing development. Therefore, groundwater may be needed for this development, and there is insufficient data available to determine whether there is adequate groundwater supply to serve development on the Moskowitz Corner sites.	<u>HYDRO-3:</u> Prior to approving a building permit for development on the Moskowitz Corner sites, the property owner and/or developer shall be required to demonstrate adequate capacity from surface water sources. If there is not adequate long-term supply from surface water sources, groundwater shall be explored as an alternative or emergency source of potable water, as well as the potential to offset groundwater use by using reclaimed water for irrigation purposes in the watershed.
CUL-1	Buried archaeological or paleontological resources could be present on any of the potential housing sites or lands to be developed under the proposed programs, and accidental discovery could occur during work on the sites. Disturbance of unknown archaeological or paleontological resources would be a significant impact.	<u>CUL-1:</u> Discretionary development projects proceeding under the programs and policies of the Housing Element and development on all of the housing sites shall comply with Action Item CC-23.2 in the Community Character Element of the Napa County General Plan. Action Item CC-23.2 requires that the Planning Department be notified if any prehistoric, archaeological or paleontological artifact is uncovered during construction. In such an event, construction must cease and an archaeologist must be consulted to evaluate the findings and recommend actions to be taken.
CUL-2	Angwin Sites A and B contain prehistoric archaeological resources that have been tentatively classified as lithic scatter. Direct impacts to the resources could result from development activities including grading, excavation, and trenching. Indirect impacts could occur from collection of artifacts by development/construction personnel and increased pedestrian traffic.	<u>CUL-2:</u> Prior to issuance of a building permit, Angwin Sites A and B shall undergo further archaeological investigations to determine whether the cultural resources on these sites qualify as sparse lithic scatters (as defined by the State Historic Preservation Officer), or whether the resources are more significant archaeological sites. If the sites are found to consist solely of sparse lithic scatters, then they shall be treated as such following SHPO treatment plans and development may occur after proper treatment has been completed. If the sites are found to be more significant archaeological sites, then no development shall occur within the limits of the sites and the limits of the sites shall be fenced and excluded from development and construction activities.
CUL-3	Moskowitz Corner Sites C and D contain prehistoric archaeological sites. Direct impacts could result from development activities including grading, excavation, and trenching. Indirect impacts could occur from collection of artifacts by development/construction personnel and increased pedestrian traffic.	<u>CUL-3:</u> No development shall occur within the limits of the known archaeological sites on Moskowitz Corner Sites C and D. The limits of the archaeological site shall be fenced and excluded from development and construction activities. Construction, parking, equipment and materials storage, and all other development activities shall be restricted from the archaeological site. Development and construction personnel shall be restricted from the archaeological site.
CUL-4	Moskowitz Corner Sites C and D contain buildings that could be significant cultural resources. Altering or demolishing these buildings would be a significant impact.	<u>CUL-4:</u> The existing buildings on Moskowitz Corner Sites C and D shall be left intact, unless a survey of these buildings conducted following protocol established by the State Office of Historic Preservation determines that they are not eligible for inclusion on the California Register of Historical Resources.
CUL-6	Buried human remains could be present on any of the potential housing sites or lands to be developed under the proposed programs, and accidental discovery could occur during work on the sites. Disturbance of	<u>CUL-6:</u> Discretionary development projects proceeding under the programs and policies of the Housing Element and development on all of the housing sites shall comply with Action Item CC-23.2 in the Community Character Element of the Napa County General Plan. Action Item CC-23.2 requires that construction

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	unknown human remains would be a significant impact.	must cease if human remain are found, and the County Coroner must be notified to determine if the remains are Native American, in which case CEQA procedures outlined in Section 15064.5 (d) and (e) must be followed.
PUB-1	Development of the Napa Pipe sites would likely necessitate a new fire station to respond to service calls generated at the site. Construction and operation of new fire protection facilities would likely result in environmental impacts.	<u>PUB-1:</u> The County shall require the developer of the Napa Pipe site to provide a new fire station on the site. New fire protection facilities must be sited appropriately to minimize potential environmental impacts associated with the construction and operation of the facility. In addition, fire protection facilities adequate to serve residents on the Napa Pipe sites must be in place prior to occupancy of proposed housing.
PUB-2	Development of the Angwin sites could necessitate a new sheriff station to respond to service calls generated at the site. Construction of new law enforcement facilities would potentially result in environmental impacts.	<u>PUB-2:</u> The County shall require that any new law enforcement facility in the Angwin area must be sited appropriately to minimize potential environmental impacts associated with the construction and operation of the facility.
PUB-3	The proposed Housing Element Update would contribute to a significant cumulative impact associated with the need for a new sheriff substation to serve the full buildout of the Napa Pipe site.	<u>PUB-3:</u> The County shall require that a new substation at Napa Pipe be sited to minimize potential environmental impacts, possibly in conjunction with a new fire station. In addition, development of a new sheriff sub-station at Napa Pipe will be required to comply with Napa County General Plan Policy SAF-34, which requires consultation with the Sheriff's Department and the City of Napa Police Department.
PUB-4	PUC and SFWD have inadequate wastewater capacity to serve new units at Angwin and Spanish Flat proposed by the Housing Element Update.	<u>PUB-4:</u> No housing shall be built on the Angwin, Moskowite Corner or Spanish Flat sites until adequate wastewater services are available.
VIS-2	Housing development on the Napa Pipe site will constitute a significant change in visual character and could impact view corridors to the Napa River from public rights-of-way such as State Route 29.	<u>VIS-2:</u> Prior to approval of a development agreement for the Napa Pipe site, require the creation of design guidelines and ensure their use to preserve view corridors to and from the Napa River.