

FINAL
Initial Study/Addendum
Devlin Road Construction & Demolition Debris Facility
City of American Canyon, Napa County, California

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SECTION 1: INTRODUCTION

This Addendum, checklist, and attached supporting documents have been prepared to determine whether and to what extent the Napa Airport Corporate Center Project Environmental Impact Report (EIR) (State Clearinghouse [SCH] No. 2014122005) remains sufficient to address the potential impacts of the proposed Devlin Road Construction & Demolition Debris Facility (proposed project), or whether additional documentation is required under the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] § 21000, *et seq.*).

1.1 - Initial Study/Environmental Checklist

Pursuant to Public Resources Code Section 21166, and CEQA Guidelines Sections 15162 and 15164, subd. (a), the attached Initial Study/checklist has been prepared to evaluate the proposed project. The attached Initial Study/checklist uses the standard environmental checklist categories provided in Appendix G of the CEQA Guidelines, but provides answer columns for evaluation consistent with the considerations listed under CEQA Guidelines Section 15162, subd. (a).

1.2 - Environmental Analysis and Conclusions

CEQA Guidelines Section 15164, subd. (a) provides that the lead agency or a responsible agency shall prepare an Addendum to a previously certified EIR or Negative Declaration (ND) if some changes or additions are necessary but none of the conditions described in CEQA Guidelines Section 15162 calling for preparation of a subsequent EIR or ND have occurred (CEQA Guidelines § 15164, subd. (a)).

An Addendum need not be circulated for public review but can be included in or attached to the Final EIR or ND (CEQA Guidelines § 15164, subd. (c)). The decision-making body shall consider the Addendum with the Final EIR and MND prior to making a decision on the project (CEQA Guidelines § 15164, subd. (d)). An agency must also include a brief explanation of the decision not to prepare a subsequent EIR or ND pursuant to Section 15162 (CEQA Guidelines § 15164, subd. (e)).

Consequently, once an EIR or ND has been certified for a project, no subsequent EIR or ND is required under CEQA unless, based on substantial evidence:

- 1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or ND . . . due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;¹
- 2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or ND . . . due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

¹ CEQA Guidelines Section 15382 defines “significant effect on the environment” as “. . . a substantial, or potentially substantial adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance . . .” (see also PRC § 21068).

- (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 or the ND was adopted. . . shows any of the following:
- a. The project will have one or more significant effects not discussed in the previous EIR or ND or negative declaration;
 - b. Significant effects previously examined will be substantially more severe than shown in the previous EIR or ND;
 - 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 or ND would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative (CEQA Guidelines § 15162, subd. (a); see also PRC § 21166).

This Addendum, checklist, and attached documents constitute substantial evidence supporting the conclusion that preparation of a supplemental or subsequent EIR or ND is not required prior to approval of the above-referenced permits by responsible and trustee agencies, and provides the required documentation under CEQA.

This Addendum addresses the conclusions of the Napa Airport Corporate Center Project EIR.

1.2.1 - Findings

There are no substantial changes proposed by the Devlin Road Construction & Demolition Debris Facility or in the circumstances in which the project will be undertaken that require major revisions of the Napa Airport Corporate Center Project EIR. The proposed revisions do not require preparation of a new subsequent or supplemental EIR, due to either the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. As illustrated herein, the project is consistent with the previous Napa Airport Corporate Center Project EIR and would involve only minor changes; therefore, an Addendum is appropriate CEQA compliance for the proposed project.

There are no substantial changes proposed by the Devlin Road Construction & Demolition Debris Facility or in the circumstances in which the project will be undertaken that require major revisions of the Final EIR, or preparation of a new subsequent or supplemental EIR, due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. As illustrated herein, the project is consistent with the Final EIR, and would involve only minor changes.

1.2.2 - Conclusions

The Napa Vallejo Waste Management Authority may approve the Devlin Road Construction & Demolition Debris Facility based on this Addendum. The impacts of the proposed project remain within the impacts previously analyzed in the EIR (CEQA Guidelines § 15164).

1.3 - Mitigation Monitoring and Reporting Program

As required by Public Resources Code Section 21081.6, subd. (a)(1), a Mitigation Monitoring and Reporting Program (MMRP) has been prepared for the project in order to monitor the implementation of the mitigation measures that have been adopted for the project. Any long-term monitoring of mitigation measures imposed on the overall development will be implemented through the MMRP.

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SECTION 2: PROJECT DESCRIPTION

2.1 - Location and Setting

2.1.1 - Location

The project site is located in the City of American Canyon, Napa County, California (Exhibit 1). The project site is bounded by the Napa Branch Line right-of-way (west), the existing Devlin Road Transfer Station (north), and Devlin Road (east and south) (Exhibit 2). The project site is located on the *Cuttings Wharf, California* United States Geological Survey 7.5-minute topographical quadrangle map, Township 4 North, Range 4 West, Section 12 (Latitude 38° 12' 15" North; Longitude 122° 15' 38" West).

2.1.2 - Environmental Setting

The 15.65-acre project site consists of two parcels (Parcel 1A and 1B) that are undeveloped and contain weedy vegetation. A rail spur that serves the transfer facility crosses the western portion of the project site.²

The project frontage with Devlin Road is improved with curb, gutter, sidewalk, and landscaping. A chain link fence demarcates the project boundaries with the Devlin Road Transfer Station. The southern portion of the site abuts a retaining wall and embankment that supports the Devlin Road overcrossing of the railroad tracks.

The project site was entitled for a 254,080-square-foot warehouse as part of the Napa Airport Corporate Center Project in June 2018. Refer to Section 2.2.2 for further discussion.

2.1.3 - General Plan and Zoning

The City of American Canyon General Plan designates the project site 'Industrial' and the Napa Valley Business Park Specific Plan zones the project site 'Business/Industrial Park.' The project site is located within Napa County Airport Land Use Compatibility Plan Zone D.

2.2 - Project Background

2.2.1 - Devlin Road Transfer Station

The Napa-Vallejo Waste Management Authority (NVWMA) is a joint-powers authority that oversees solid waste and recycling activities within southern Napa County and southwestern Solano County. The City of American Canyon is a member agency of NVWMA.

NVWMA operates the Devlin Road Transfer Station in unincorporated Napa County within the Napa Airport Business Park. The transfer station began operations in 1995 and accepts municipal solid waste and construction and demolition (C&D) debris. NVWMA's current Solid Waste Facility Permit

² The rail spur has been inactive for years. However, it remains in operable condition and NVWMA has the discretion to reactivate it.

Project Description

with the California Department of Resources Recovery and Recycling limits the facility to 1,440 tons of receipt and 600 truck trips per day. Municipal solid waste is processed within an enclosed facility, while construction and demolition (C&D) activities occur outdoors on an asphalt concrete pad and within a Ptarmigan processing line.

Typical throughput is 300 tons per 8-hour shift. Recoverable C&D materials are separated while non-recoverable materials are processed into alternative daily cover for the Potrero Hills Landfill near Suisun City. Approximately 2,800 tons of alternative daily cover are produced per month. The facility accepts waste between 5:00 a.m. and 4:00 p.m. daily (except for New Year's Day, Easter, Thanksgiving, and Christmas). Staff remains on-site until approximately 8:00 p.m.

Exhibit 3 provides photos of the existing C&D operation.

2.2.2 - Napa Airport Corporate Center Project

The City of American Canyon certified an EIR for the Napa Airport Corporate Center Project (SCH No. 2014122005) and adopted Findings of Fact and a Statement of Overriding Considerations in June 2018. The Napa Airport Corporate Center Project consisted of a 515,621-square-foot entitled business park on 47.56 acres.³ The EIR evaluated a 254,080-square-foot warehouse on the project site, also known as Lot 4 or Building H. NVWMA acquired the lot from the Napa Airport Corporate Center applicant in November 2017 prior to the certification of the EIR. Exhibit 4 depicts the Napa Airport Corporate Center site plan.

2.2.3 - Agency Status

NVWMA assumed Responsible Agency status when it acquired Lot 4. Because NVWMA is an independent public agency, it can approve development projects on property it owns without requiring third party approval. As a Responsible Agency, NVWMA intends to use the Napa Airport Corporate Center EIR as the basis for satisfying its environmental review obligations under CEQA.

2.3 - Project Characteristics

2.3.1 - Project Summary

NVWMA is proposing to amend its existing Solid Waste Facility Permit to develop a partially enclosed C&D debris facility Parcel 1A (8.8 acres) to improve operational efficiency and better abate dust, noise, water pollution, and lighting impacts from the existing unenclosed operation. NVWMA is not proposing to increase the tonnage or truck trip limits established by the existing Solid Waste Facility Permit; however, the permit would be amended to reflect the larger facility footprint and presence of the new C&D facility.

Parcel 1B (6.68 acres) would be improved with storm drainage facilities and remain an undeveloped graded gravel area. NVWMA reserves the right to develop this parcel at a future date or sell it.

³ The project included an option to develop a gas station, truck refueling facility, convenience market, quick serve restaurant, and car wash on one of the lots that would reduce total square footage to 498,302.

2.3.2 - Proposed Facility

The approximately 155,000-square-foot 'L'-shaped facility exterior west-, south-, and east-facing sides would be enclosed and the interior north- and west-facing sides would be open to allow vehicular access. The structure would provide a minimum interior clear height of 35 feet. Table 1 summarizes the proposed C&D facility. Exhibit 5 depicts the conceptual site plan.

Table 1: Construction & Demolition Debris Facility Summary

Activity Area	Description
Tipping Floor	Approximately 40,000 square feet; Materials dumped on floor and moved by frontend loaders to sorting infeed
Sorting	Existing Ptarmigan processing line relocated to C&D facility; Workers manually sort C&D materials into recoverable and non-recoverable piles
Processing Equipment	Approximately 12,000 square feet; Recoverable materials separated for recycling; Non-recoverable materials processed into Alternative Daily Cover
Green Waste Grinder	Green waste ground up into mulch
Administrative Office	Office space located in corner of building near Devlin Road frontage

Source: Napa Vallejo Waste Management Authority, 2020.

2.3.3 - Site Layout and Operation

The C&D facility would directly interface with the existing transfer station. Vehicles dumping debris would enter the C&D facility from the transfer station and exit the same way in the interests of funneling all of the disposal traffic through the existing public access point on Devlin Road. A new driveway and parking lot for facility operations and public safety would be installed along the Devlin Road frontage; however, it would not be used by disposal traffic.

Improvements would be made to the existing access point on Devlin Road to add a scale and bypass lane.

The rail spur would remain unchanged. The existing soil bunker would be removed. Additionally, no substantial changes in employment would occur.

2.3.4 - Storm Drainage

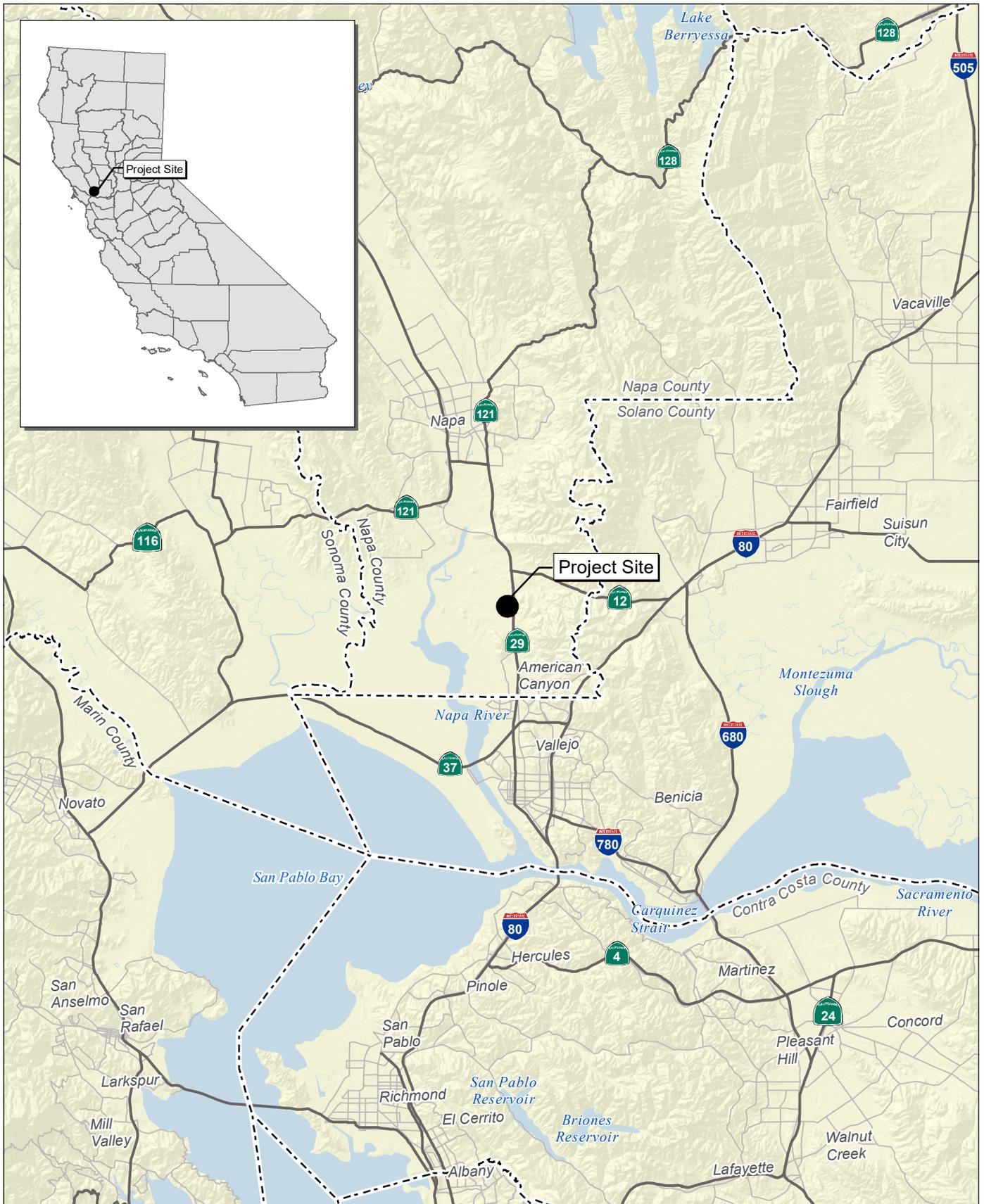
New storm drainage facilities would be installed. Underground piping ranging from 8- to 18-inches in diameter would be installed throughout the site. Runoff would be conveyed south to a bio-retention basin installed within Parcel 1B adjacent to the Devlin Road overcrossing.

2.4 - Discretionary Approvals

The proposed project requires the following discretionary approvals from NVWMA:

- Adoption of Addendum
- Amendment of existing Solid Waste Facility Permit

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Source: Census 2000 Data, The CaSIL.

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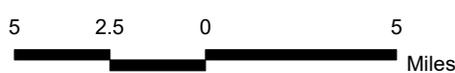


Exhibit 1 Regional Location Map

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Legend

- Project Site
- Napa Airport Corporate Center
- American Canyon City Boundary

Source: ESRI Aerial Imagery

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Exhibit 2
Local Vicinity Map
Aerial Base

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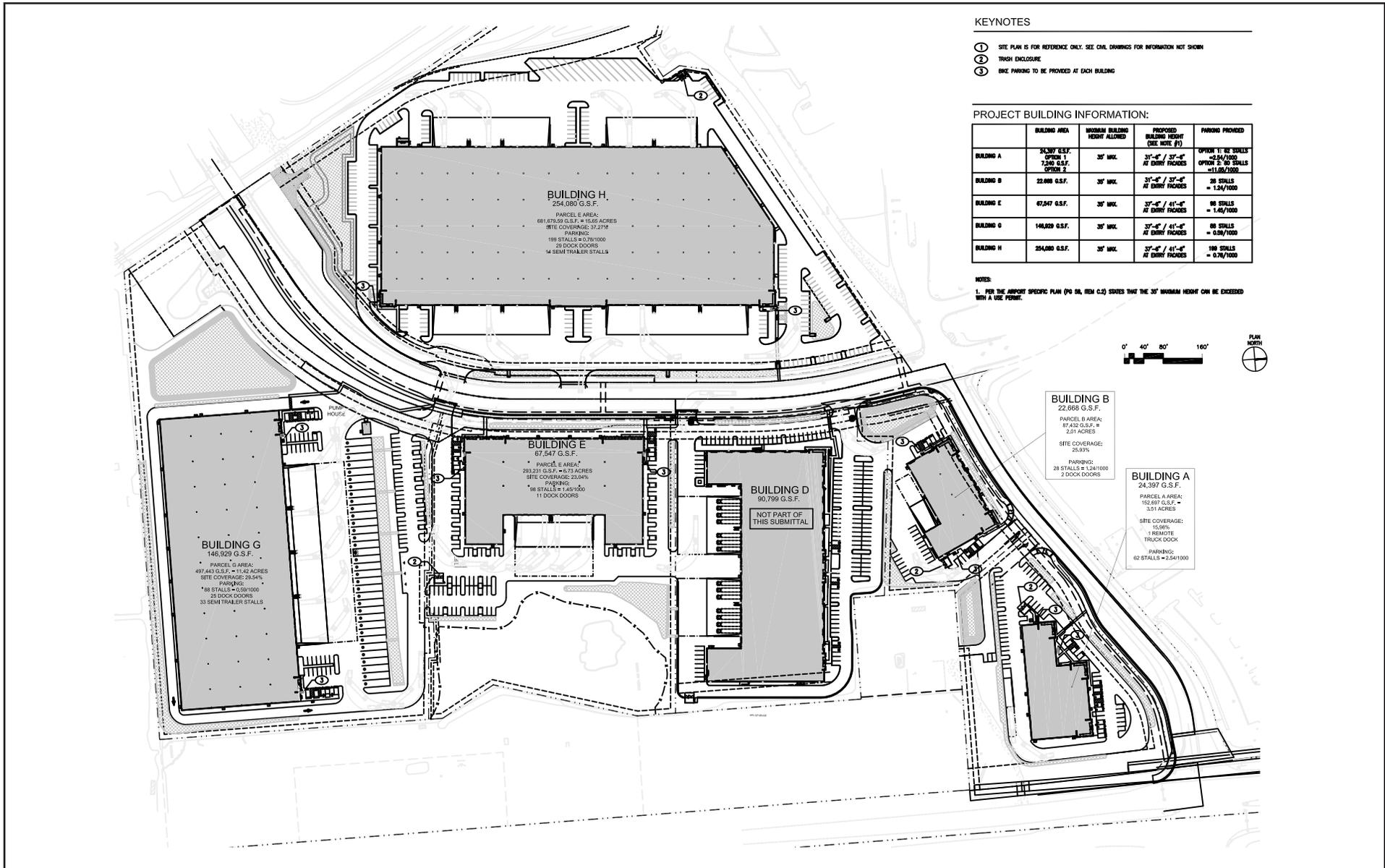


Photograph 1: View of existing unenclosed Construction & Demolition Debris operation.



Photograph 2: View of project site from interface point with existing transfer station.

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Source: RMW, 2018

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SECTION 3: CEQA CHECKLIST

The purpose of the checklist is to evaluate the categories in terms of any changed condition (e.g., changed circumstances, project changes, or new information of substantial importance) that may result in a changed environmental result (e.g., a new significant impact or substantial increase in the severity of a previously identified significant effect) (CEQA Guidelines § 15162).

The questions posed in the checklist come from Appendix G of the CEQA Guidelines. A “no” answer does not necessarily mean that there are no potential impacts relative to the environmental category, but that there is no change in the condition or status of the impact since it was analyzed and addressed with mitigation measures in the Final EIR. These environmental categories might be answered with a “no” in the checklist, since the proposed project does not introduce changes that would result in a modification to the conclusion of the previously approved CEQA document.

This Addendum addresses the conclusions of the Napa Airport Corporate Center Project EIR. As a Responsible Agency, NVWMA has decision making authority over the proposed project. As such, the text of various mitigation measures have been modified to reflect that NVWMA will carry out the project and implement the applicable mitigation measures.

3.1 - Explanation of Checklist Evaluation Categories

(1) Conclusion in Napa Airport Corporate Center Project EIR and Related Documents

This column summarizes the conclusion of the Napa Airport Corporate Center Project EIR relative to the environmental issue listed under each topic.

(2) Do the Proposed Changes Involve New Impacts?

Pursuant to CEQA Guidelines Section 15162, subd. (a)(1), this column indicates whether the changes represented by the revised Project will result in new significant environmental impacts not previously identified or mitigated by the Napa Airport Corporate Center Project EIR or whether the changes will result in a substantial increase in the severity of a previously identified significant impact.

(3) New Circumstances Involving New Impacts?

Pursuant to CEQA Guidelines Section 15162, subd. (a)(2), this column indicates whether there have been substantial changes with respect to the circumstances under which the Project is undertaken that will require major revisions to the Napa Airport Corporate Center Project EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

(4) New Information Requiring New Analysis or Verification?

Pursuant to CEQA Guidelines Section 15162, subd. (a)(3)(A–D), this column indicates whether 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 Napa Airport Corporate Center Project EIR was adopted, 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.

If the additional analysis completed as part of this environmental review were to find that the conclusions of the Napa Airport Corporate Center Project EIR remain the same and no new significant impacts are identified, or identified impacts are not found to be substantially more severe, or additional mitigation is not necessary, then the question would be answered “no” and no additional environmental document would be required.

(5) Mitigation Measures Implemented or Address Impacts

Pursuant to CEQA Guidelines Section 15162, subd. (a)(3), this column indicates whether the EIR provides mitigation measures to address effects in the related impact category. Any previously adopted mitigation measures will be identified. The response will also address proposed revisions to previously adopted mitigation measures. These mitigation measures will be implemented with the construction of the project, as applicable. If “NA” is indicated, the Final EIR has concluded that the impact either does not occur with this Project or is not significant, and therefore no additional mitigation measures are needed.

3.2 - Discussion and Mitigation Sections

(1) Discussion

A discussion of the elements of the checklist is provided under each environmental category in order to clarify the answers. The discussion provides information about the particular environmental issue, how the project relates to the issue, and the status of any mitigation that may be required or that has already been implemented.

(2) Mitigation Measures

Applicable mitigation measures from the Initial Study that apply to the project are listed under each environmental category.

(3) Conclusions

A discussion of the conclusion relating to the analysis is contained in each section.

Environmental Issue Area	Conclusion in EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
I. Aesthetics, Light, and Glare					
<i>Except as provided in Public Resources Code Section 21099, would the project:</i>					
a) Have a substantial adverse effect on a scenic vista?	Less than significant impact	No	No	No	None
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a State Scenic Highway?	No impact	No	No	No	None
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	Less than significant impact	No	No	No	None
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Less than significant impact after mitigation	No	No	No	Mitigation Measure AES-3

Discussion

- a) The Final EIR indicated that the Napa Airport Corporate Center Project site contains flat undeveloped land. The project site does not contain any visual resources that would be considered a scenic vista, and the City of American Canyon General Plan does not identify any scenic vistas on the project site. The Final EIR concluded that impacts would be less than significant.

The proposed facility would be partially enclosed with walls on its west, south, and east faces. By design, it would resemble a warehouse when viewed from Napa Logistics Park and Devlin Road. As such, the proposed facility would not alter any aesthetic conclusions set forth in the Final EIR.

- b) The Final EIR indicated that State Route 29 (SR-29) is located east of the Napa Airport Corporate Center Project site and is classified as an “Eligible” State Scenic Highway. However, only Lot 1 at the corner of SR-29 and South Kelly Road is visible; the rest of the site is not visible because of the presence of structures, topography, and vegetation. The Final EIR indicated that no impacts would occur.

The proposed facility is located in the portion of the site that is not visible from SR-29. As such, the proposed facility would not alter any aesthetic conclusions set forth in the Final EIR.

- c) The Final EIR indicated that the Napa Airport Corporate Center Project site contains flat undeveloped land. The project site is surrounded by the Napa Logistics Park Project, the Napa Branch railroad line, the Devlin Road Transfer Station, and Devlin Road (and associated overcrossing). The Napa Airport Corporate Center Project would develop an approximately 254,000-square-foot warehouse on the project site. The Final EIR noted that project buildings would be similar in size, character, building materials, and end uses that are similar to other surrounding land uses and thus would be visually compatible. The Final EIR concluded that development of the Napa Airport Corporate Center Project would not degrade the visual character of the project site or its surroundings. Impacts would be less than significant.

The proposed facility would be partially enclosed with walls on its west, south, and east faces. By design, it would resemble a warehouse when viewed from Napa Logistics Park and Devlin Road. As such, the proposed facility would not alter any aesthetic conclusions set forth in the Final EIR.

- d) The Final EIR indicated that the Napa Airport Corporate Center Project site does not contain any existing sources of light and glare. The project site is adjacent to the Napa County Airport and has the potential to introduce new sources of light and glare that may interfere with aviation activities. The Final EIR set forth Mitigation Measure AES-3 requiring the project applicant to prepare a photometric plan demonstrating that all exterior light fixtures are directed downward or employ full cut-off fixtures to minimize light spillage and avoid interference with airport operations. With the implementation of Mitigation Measure AES-3, the Final EIR concluded that impacts would be reduced to a level of less than significant.

The proposed facility would operate during early morning and evening hours and, thus, employ exterior lighting for safety and security purposes. Mitigation Measure AES-3, as modified, would continue to apply and reduce impacts to a level of less than significant. As such, the proposed facility would not alter any light and glare conclusions set forth in the Final EIR.

Mitigation Measures

MM AES-3 NVWMA shall only install exterior light fixtures that are directed downward or employ full cut-off fixtures to minimize light spillage and avoid interference with aviation operations at the Napa County Airport. Prior to issuance of building permits for the proposed project, the project applicant shall prepare and submit a photometric plan to the City of American Canyon for review and approval which demonstrates that all exterior light fixtures would be directed downward or employ full cut-off fixtures to minimize light spillage and avoid interference with aviation operations at the Napa County Airport. The approved plan shall be incorporated into the proposed project.

Conclusion

The conclusions from the Final EIR would remain unchanged with the approval of the proposed facility.

Environmental Issue Area	Conclusion in EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
II. Agricultural and Forest Resources					
<i>Would the project:</i>					
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	No impact	No	No	No	None
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	No impact	No	No	No	None
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	No impact	No	No	No	None
d) Result in the loss of forest land or conversion of forest land to non-forest use?	No impact	No	No	No	None
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	No impact	No	No	No	None

Discussion

- a) The Final EIR indicated that the Napa Airport Corporate Center Project site is mapped as “Farmland of Local Importance” and “Other Land,” which does not fall under the Important Farmland umbrella. Thus, the proposed Napa Airport Corporate Center Project would not convert Important Farmland to non-agricultural use. The Final EIR concluded that no impacts would occur.

The proposed facility would not result in any change to the farmland designation for the project site and no updated designation has occurred since certification of the Final EIR. As such, the proposed facility would not alter any agriculture and forestry conclusions set forth in the Final EIR.

- b) The Final EIR indicated that the Napa Airport Corporate Center Project site is zoned “Business/Industrial Park” by the Napa County Airport Industrial Area Specific Plan, a non-agricultural zoning district. Additionally, the project site is not encumbered by an active Williamson Act contract. These conditions preclude the possibility of conflicts with agricultural zoning or Williamson Act contracts. The Final EIR concluded that no impacts would occur.

The proposed facility would not result in any change to the zoning applicable to the site and no zoning changes have occurred since the Final EIR was certified. Additionally, no Williamson Act contracts have been executed for the site since certification of the Final EIR. As such, the proposed facility would not alter any agriculture and forestry conclusions set forth in the Final EIR.

- c) The Final EIR indicated that the Napa Airport Corporate Center Project site is zoned “Business/Industrial Park” by the Napa County Airport Industrial Area Specific Plan, a non-forest zoning district. This condition precludes the possibility of conflicts with forest zoning. The Final EIR concluded that no impacts would occur.

The proposed facility would not change the zoning designation for the site and no changes have occurred with respect to the project site zoning designation since certification of the Final EIR. As such, the proposed facility would not alter any agriculture and forestry conclusions set forth in the Final EIR.

- d) The Final EIR indicated that the Napa Airport Corporate Center Project site contains undeveloped land and does not contain any stands of trees that would meet the State’s definition of forest land. Thus, the Napa Airport Corporate Center Project would not convert forest land to non-forest use. The Final EIR concluded that no impacts would occur.

The proposed facility would not change the nature of the existing project site and no changes have occurred related to forest land on the site since the Final EIR was certified. As such, the proposed facility would not alter any agriculture and forestry conclusions set forth in the Final EIR.

- e) The Final EIR indicated that the Napa Airport Corporate Center Project site is surrounded by urban uses and infrastructure on all sides and, therefore, would not result in the conversion of Important Farmland to non-agricultural use. The Final EIR concluded that no impacts would occur.

The proposed facility would not change the nature of the project site and the surrounding area and no changes related to agricultural resources have occurred on-site since the Final EIR was certified. As such, the proposed facility would not alter any agriculture and forestry conclusions set forth in the Final EIR.

Mitigation Measures

None.

Conclusion

The conclusions from the Final EIR would remain unchanged with the approval of the facility.

Environmental Issue Area	Conclusion in EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
III. Air Quality					
<i>Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.</i>					
<i>Would the project:</i>					
a) Conflict with or obstruct implementation of the applicable air quality plan?	Significant unavoidable impact	No	No	No	Mitigation Measures AIR-2, AIR-3a, and AIR-3b.
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	Significant unavoidable impact	No	No	No	Mitigation Measures AIR-2, AIR-3a, and AIR-3b.
c) Expose sensitive receptors to substantial pollutant concentrations?	Significant unavoidable impact	No	No	No	Mitigation Measures AIR-2, AIR-3a, and AIR-3b.
d) Result in other emissions (such as those leading to odors or) adversely affecting a substantial number of people?	Less than significant impact	No	No	No	None

Air Quality Supporting Information is provided in Appendix A.

Discussion

- a) The Final EIR found that the Napa Airport Corporate Center Project would have a significant and unavoidable impact related to its potential to conflict with or obstruct implementation of the applicable air quality plan, because operation of the proposed project would exceed criteria pollutant thresholds for ozone precursors. The Final EIR set forth Mitigation Measures AIR-2, AIR-3a, and AIR-3b, which require emissions reduction measures but the residual significance of this impact would remain significant and unavoidable.

The proposed facility would house the existing construction and demolition debris recycling operation that occurs within the neighboring Devlin Road Transfer Station. The facility would

result in no net increase in the facility's permitted throughput (1,440 tons of receipt and 600 truck trips per day) and, thus, there would be no net increase in trip generation. Because Lot 4 represented approximately 44 percent of the Napa Airport Corporate Center's square footage (as evaluated under Option 1 of the Final EIR), the proposed project would substantially reduce the trip generation potential and the corresponding air quality impacts disclosed in the Final EIR. This analysis determined that the proposed project would be consistent Criteria 2 and 3, but would conflict with Criteria 1 because its cumulative emissions exceed the BAAQMD significance thresholds for Annual Average PM_{2.5} Health Risks and Hazards for Sensitive Receptors (Cumulative from All Sources within 1,000-Foot Zone of Influence) and Cumulative Thresholds for New Sources. Therefore, impacts associated with conflicting with or obstructing implementation of the 2017 CAP would be significant and unavoidable. Mitigation Measures AIR-2 and AIR-3a would apply since new construction would occur; however, Mitigation Measure AIR-3b would not apply since there would be no net increase in truck trips. As such, the proposed facility would not alter any air quality conclusions set forth in the Final EIR.

- b) The Final EIR found that Napa Airport Corporate Center Project-related construction activities would emit fugitive dust and set forth Mitigation Measure AIR-2 requiring compliance with Bay Area Air Quality Management District (BAAQMD) dust abatement measures to reduce impacts to less than significant. The Final EIR compared traffic patterns around the Napa Airport Corporate Center Project with BAAQMD screening criteria for CO hotspots and found that they were below adopted thresholds. The Final EIR found that the Napa Airport Corporate Center Project would emit criteria pollutants from construction and operational activities that would exceed BAAQMD significance thresholds. Ozone precursors emissions from construction exceeded the threshold before mitigation but were below the threshold after mitigation. Mitigation Measure AIR-3a requires that all diesel equipment be powered by Tier 3 engines or equivalent. The Napa Airport Corporate Center Project would continue to be required to comply with this mitigation measure, and thus emissions would not change. Ozone precursors emissions from operations also exceeded thresholds. Mitigation Measure AIR-3b mitigated emissions from heavy-duty trucks since emissions from heavy-duty trucks would be a large contributor to emissions. Since the effectiveness of this measure was uncertain, this impact was determined to be significant and unavoidable.

The proposed facility would house the existing construction and demolition debris recycling operation that occurs within the neighboring Devlin Road Transfer Station. The facility would result in no net increase in the facility's permitted throughput (1,440 tons of receipt and 600 truck trips per day) and, thus, there would be no net increase in trip generation. Because Lot 4 represented approximately 44 percent of the Napa Airport Corporate Center's square footage (as evaluated under Option 1 of the Final EIR), the proposed project would substantially reduce the trip generation potential and the corresponding air quality impacts disclosed in the Final EIR. This analysis determined that the proposed project would result in no net increase in motor vehicle trip generation and hence no increase in CO emissions. Therefore, the proposed project would not exceed the CO screening criteria and would have a less than significant impact related to CO. Mitigation Measures AIR-2 and AIR-3a would apply since new construction would occur; however, Mitigation Measure AIR-3b would not apply since there

would be no net increase in truck trips. As such, the proposed facility would not alter any air quality conclusions set forth in the Final EIR.

- c) The Final EIR evaluated the human health impact from the Napa Airport Corporate Center Project on surrounding receptors and the cumulative impact on those receptors. The cumulative impact was determined to be significant and unavoidable based on the Napa Airport Corporate Center Project's contribution to existing community health risks in the project vicinity. The cumulative health impact analysis in the Final EIR added the impact of all surrounding non-project sources of toxic air contaminants to the Napa Airport Corporate Center Project impacts. Mitigation Measure AIR-3a would reduce construction emissions of toxic air contaminants; however, due to the conservative methodology used, two receptors east of the project site would be exposed to cancer risk in excess of adopted thresholds. The residual significance of this impact would remain significant and unavoidable.

The proposed facility would house the existing construction and demolition debris recycling operation that occurs within the neighboring Devlin Road Transfer Station. The facility would result in no net increase in the facility's permitted throughput (1,440 tons of receipt and 600 truck trips per day) and, thus, there would be no net increase in trip generation. Because Lot 4 represented approximately 44 percent of the Napa Airport Corporate Center's square footage (as evaluated under Option 1 of the Final EIR), the proposed project would substantially reduce the trip generation potential and the corresponding air quality impacts disclosed in the Final EIR. This analysis determined that project-related emissions would not result in significant health impacts to nearby sensitive receptors during construction or operation. However, the cumulative impacts from project construction and existing sources of TACs would exceed the BAAQMD cumulative thresholds of significance. This is due to PM_{2.5} emissions from the existing Devlin Road Transfer and Recycling. This is beyond the proposed project's control and thus the cumulative health risk impacts from project construction would be significant and unavoidable. Mitigation Measure AIR-3a would apply since new construction would occur. As such, the proposed facility would not alter any air quality conclusions set forth in the Final EIR.

- d) The Final EIR indicated that the Napa Airport Corporate Center Project industrial uses would not be sources of objectionable odors because they would not involve land use activities that are recognized sources of odors (e.g., feed lots, sewage treatment, solid waste, composting, etc.). The Final EIR concluded that impacts would be less than significant.

The proposed facility would house the existing construction and demolition debris recycling operation that occurs within the neighboring Devlin Road Transfer Station. Construction and demolition debris recycling typically involves processing wood, concrete, dry wall, metal, fiberglass, textile, and plastic wastes that are not sources of objectionable odors. Organic wastes, which are the most common odor emitting wastes, are not processed as part of construction and demolition debris recycling. Regardless, to the extent odors are emitted by the construction and demolition debris recycling operation, this is an existing condition that would be abated by relocation to a partially enclosed facility. Furthermore, there would be no net increase in the facility's permitted throughput (1,440 tons of receipt and 600 truck trips per

day). This analysis determined that construction and operational odor impacts would be less than significant. As such, the proposed facility would not alter any air quality conclusions set forth in the Final EIR.

Mitigation Measures

- MM AIR-2** All construction activity: During construction activities, the following air pollution control measures shall be implemented:
- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day, or more as needed.
 - All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
 - All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
 - All vehicle speeds on unpaved roads and surfaces shall be limited to 15 miles per hour.
 - All roadways, driveways, and sidewalks shall be paved as soon as possible.
 - Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
 - Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 2 minutes (beyond the 5 minute limit required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
 - All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified visible emissions evaluator.
 - A publicly visible sign shall be posted with a name and telephone number of the applicant's representative for dust complaints. This person shall respond and take corrective action within 2 business days of a complaint or issue notification. The Bay Area Air Quality Management District's phone number shall also be visible to ensure compliance with applicable regulations.
- MM AIR-3a** During on-site construction activities, the applicant shall require the use of clean construction equipment. All diesel equipment shall be powered by Tier 3 engines or equivalent. In addition, all off-road equipment idling shall be limited to 2 minutes.
- MM AIR-3b** Prior to issuance of the final certificate of occupancy for each building, the following measures to reduce emissions from on-site heavy duty trucks shall be implemented:
- a) Post signs in all loading/unloading areas informing truck drivers California Air Resources Board (ARB) diesel anti-idling regulations. The signs shall include

telephone numbers of the building facilities manager and the ARB to report violations.

- b) Require facility management to be trained in ARB anti-idling regulations. Anti-idling training shall be incorporated into the facility operations manual or equivalent document.
- c) Provide tenants with information about SmartWay or other organizations that seek to reduce air emissions associated with goods movement. **(Does not apply to project).**

Conclusion

The conclusions from the Final EIR would remain unchanged with the approval of the facility.

Environmental Issue Area	Conclusion in EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
IV. Biological Resources					
<i>Would the project:</i>					
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	Less than significant impact after mitigation	No	No	No	Mitigation Measures BIO-1a, BIO-1b, BIO-1c, BIO-1d, BIO-2a, BIO-2b, and BIO-2c.
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	Less than significant impact after mitigation	No	No	No	Mitigation Measure BIO-4
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	Less than significant impact after mitigation	No	No	No	Mitigation Measure BIO-4
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native	Less than significant impact	No	No	No	None

Environmental Issue Area	Conclusion in EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
resident or migratory wildlife corridors, or impede the use of wildlife nursery sites?					
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	No impact	No	No	No	None
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	No impact	No	No	No	None

Discussion

- a) The Final EIR indicated that the Napa Airport Corporate Center Project site contains no habitat for the majority of the special-status plant or wildlife species recorded in the vicinity of the project site. The Final EIR determined that project site contains potentially suitable habitat for special-status species including dwarf downingia (*Downingia pusilla*), legenere (*Legenere limosa*), burrowing owl (*Athene cunicularia*), western pond turtle (*Actinemys marmorata*), and nesting birds. The Final EIR set forth Mitigation Measures BIO-1a, BIO-1b, BIO-2a, BIO-2b, and BIO-2c, which require surveys for the affected species prior to construction and implementation of avoidance or relocation measures, to reduce impacts to less than significant.

The proposed facility would be located on Lot 4, which consists of non-native grassland habitat. The habitat found on Lot 4 could provide suitable foraging habitat for burrowing owl, ferruginous hawk (*Buteo regalis*), and Swainson's hawk (*Buteo swainsoni*). However, no suitable nesting habitat for any of these species is located in or near the project site. Active Swainson's hawk nests have been recorded within 3 miles of the Lot 4 parcel. Additionally, no ground squirrel or other small mammal burrows or other cavities suitable for burrowing owl nesting were identified during a biological survey conducted by Cardno ENTRIX in April 2013 and subsequent surveys by FCS in January 2020. The only State or federally listed species that

has potential occur on-site is showy rancheria clover (*Trifolium amoenum*), but the likelihood of occurrence for this species is low.

The proposed facility would involve vegetation removal and ground disturbance and thus, have the potential to impact special-status plant and wildlife species, listed above. The implementation of Mitigation Measures BIO-1a, BIO-1b, BIO-1c and BIO-1d would reduce potential impacts of the proposed project to showy rancheria and other special-status plant species to as less than significant level. Mitigation Measures BIO-2a and BIO-2c would apply and reduce potential impacts to burrowing owl and nesting birds and raptors to a level of less than significant. As such, the proposed facility would not alter any conclusions set forth in the Final EIR.

- b–c) The final EIR indicated that approximately 3.49 acres of seasonal wetlands occur on Lots 5 and 6 within the project site. Some of the seasonal wetlands will be partially avoided and the stock pond will be entirely avoided. All other wetlands will be permanently filled because of construction activities. The Final EIR proposes Mitigation Measure BIO-4, which requires the project applicant to obtain all requisite approvals and permits from the appropriate regulatory agencies for impacts to waters of the United States and waters of the State. The Final EIR concluded that impacts would be reduced to a level of less than significant.

The proposed facility would be located on Lot 4. The Final EIR indicated that no jurisdictional wetlands/waters or other sensitive habitats are present on the Lot 4 parcel. As such, no impacts to jurisdictional features would occur. Accordingly, Mitigation Measure BIO-4 does not apply to the proposed project.

- d) The Final EIR indicated that the Napa Airport Corporate Center Project site does not serve as a wildlife or fish movement corridor, because it does not connect two significant habitats. The proposed facility would be developed with a portion of the project site bounded by the Napa Branch Line, the Devlin Road Transfer Station, and Devlin Road. Additionally, much of the project area has already been excluded from the surrounding area by fencing around the commercial lots and Napa County Airport. The linear waters within the project area do not serve as wildlife corridors since they do not connect two significant habitat areas. The Final EIR concluded that the proposed project would not impact wildlife movement. As such, the proposed project would not alter any conclusions set forth in the Final EIR.
- e) The Final EIR indicated that there are no trees on the Napa Airport Corporate Center Project site, including Lot 4; therefore, the project is not subject to the City of American Canyon tree preservation requirements (Municipal Code Chapter 18.40). No conflicts with local biological ordinances or policies would occur. The Final EIR concluded that no impact would occur.

The proposed facility would be developed within a portion of the project site that does not contain any trees. As such, the proposed project would not alter any conclusions set forth in the Final EIR.

- f) The Final EIR indicated that the Napa Airport Corporate Center Project site does not lie within the boundaries of any adopted local, regional, or State Habitat Conservation Plan or Natural Community Conservation Plan. Therefore, no conflicts with adopted conservation plans would occur. The Final EIR concluded that no impact would occur.

The proposed facility would be located within the boundaries of the project site. As such, the proposed project would not alter any conclusions set forth in the Final EIR.

Mitigation Measures

MM BIO-1a Prior to any vegetation removal or ground-disturbing activities, focused surveys shall be conducted to determine the presence of special-status plant species with potential to occur within the project site. Surveys shall be conducted in accordance with the Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (CDFG 2009). These guidelines require rare plant surveys to be conducted at the proper time of year when rare or endangered species are both “evident” and identifiable. Field surveys shall be scheduled to coincide with known blooming periods, and/or during periods of physiological development that are necessary to identify the plant species of concern. If no special-status plant species are found, then the project will not have any impacts to the species and no additional mitigation measures are necessary. If any of the special-status plant species are found and cannot be avoided, the following measures shall be required:

- Where surveys determine that special-status plant species are present within the off-site development areas, direct and indirect impacts of the project on the species (e.g., dwarf downingia and legenera, or other species with potential habitat in the project area during the appropriate time of year) shall be avoided where feasible through the establishment of activity exclusion zones, where no ground-disturbing activities shall take place, including construction of new facilities, construction staging, or other temporary work areas. Activity exclusion zones for special-status plant species shall be established prior to construction activities around each occupied habitat site, the boundaries of which shall be clearly marked with standard orange plastic construction exclusion fencing or its equivalent. The establishment of activity exclusion zones shall not be required if no construction-related disturbances would occur within 250 feet of the occupied habitat site. The size of activity exclusion zones may be reduced through consultation with a qualified biologist and with concurrence from USFWS or CDFW, as applicable, based on site-specific conditions.

MM BIO-1b If special-status plants are found within the project site and cannot be avoided, the Applicant shall retain a qualified biologist and consult with the USFWS or CDFW, as applicable, to prepare a special-status plant mitigation and monitoring plan to determine feasible impact minimization and mitigation for those special-status

plants, which may include but are not limited to elements as applicable to the species, based on the project impacts, and as modified by the resource agencies:

- On-site seed/propagule salvage and transplantation to mitigate for unavoidable temporary construction impacts to special-status plants habitat.
- Incorporating project site management requirements designed to reduce ongoing impacts from project operation, including controlling public access to avoided special-status plants habitat remaining on-site.
- A salvage/transplanting program shall be developed, as part of a special-status plant mitigation and monitoring plan, for the salvage and transfer of special-status plants populations before the initiation of construction activities to another location either off-site or on-site that will be preserved in perpetuity (via conservation easement, deed restriction, or other appropriate legal means). Permits may be required from the CDFW or USFWS if a listed species is found and may require further mitigation in consultation with the appropriate agency or agencies. (Note: salvage/transplantation methods for the salvaged plant population must be developed on a species-by-species basis and would likely include the involvement of local conservation easements/preserves/open space, where applicable to ensure preservation in perpetuity). The salvage of special-status plant species must be performed at the correct time of year and transplanting must be successfully completed during the same year as construction was completed. The propagation program shall include establishment of success criteria for the affected special-status plants.
- Efforts shall be made to salvage portions of the habitat or plant populations that will be lost as a result of implementation of the proposed project. In addition to salvaging of special-status plants themselves, salvage efforts shall include topsoil and seed-banks surrounding impacted plants, if doing so will not contribute to the spread of invasive or noxious plant species.
- If the resource agencies determine that implementation of Mitigation Measure BIO-1b is insufficient to mitigate for the loss of special-status plants, the applicant shall instead implement Mitigation Measure BIO-1d.

MM BIO-1c If special-status plants are found on-site and Mitigation Measure BIO-1b is implemented, the Applicant shall design and implement a monitoring program as part of the special-status plant mitigation and monitoring plan to evaluate compliance with and the effectiveness of these mitigation measures. The monitoring program shall be conducted by a qualified botanist, and shall take place periodically during project construction, and annually, following the completion of construction, for 5 years. The project applicant shall bear the financial responsibility for mitigation measure monitoring and reporting for the entirety of the 5-year reporting period. If the monitoring program identifies mitigation measure noncompliance or ineffectiveness, the project applicant shall fund and implement remedial measures, including but not limited to on-site habitat restoration, re-seeding, the installation

and maintenance of additional fencing, and other appropriate measures. The project applicant shall ensure that sufficient funding exists to complete all reasonably foreseeable remedial actions prior to the commencement of project construction. Annual monitoring reports shall be submitted to the USFWS or CDFW as applicable.

MM BIO-1d

In lieu of on-site mitigation pursuant to Mitigation Measure BIO-1b and Mitigation Measure BIO-1c, as allowed in writing by the City (for CEQA-protected species only) or CDFW (for state-listed species) or USFWS (for federally listed species), mitigation requirements may be satisfied via the purchase of qualified mitigation credits or the preservation of off-site habitat.

Appropriate off-site conservation opportunities shall be identified and, if feasible, protected in perpetuity through the purchase of conservation easements and/or mitigation bank credits. The habitat value of off-site conservation areas shall be enhanced where feasible through means such as reducing grazing intensity and restricting access. At a minimum, the loss of individuals or acres of occupied habitat (as appropriate) of a special-status species shall be compensated for through the acquisition, protection, and subsequent management of other existing occurrences at a ratio of 1:1. The resource agencies may increase the ratio depending on the rarity of the affected rare plant species (i.e., a listed species), and the abundance of the rare plant habitat impacted.

MM BIO-2a

No more than 14 days prior to commencement of ground-disturbing activities, the project applicant shall retain a qualified biologist to conduct burrowing owl surveys and impact assessment in accordance with the latest edition of the California Department of Fish and Wildlife Staff Report on Burrowing Owl Mitigation. The survey(s) shall be submitted to CDFW. If it is determined that project activities may result in impacts to nesting, occupied, and satellite burrows or burrowing owl habitat, the project applicant shall consult with CDFW and develop a detailed mitigation plan such that the habitat acreage, number of burrows and burrowing owls impacted are replaced. The mitigation plan shall be based on the requirements set forth in the latest edition of the Staff Report on Burrowing Owl Mitigation. Mitigation shall consist of one of the following options:

- (1) If burrowing owls are present and direct impacts can be avoided, the project applicant shall implement the following avoidance measures during all phases of construction to reduce or eliminate potential impacts to burrowing owls.
 - Avoid disturbing occupied burrows during the nesting period, from 1 February through 31 August.
 - Avoid impacting burrows occupied during the non-breeding season by migratory or non-migratory resident burrowing owls.
 - Avoid direct destruction of burrows through chaining (dragging a heavy chain over an area to remove shrubs), disking, cultivation, and urban, industrial, or agricultural development.

- Develop and implement a worker awareness program to increase the on-site workers' recognition of and commitment to burrowing owl protection.
- Place visible markers near burrows to ensure that farm equipment and other machinery does not collapse burrows.
- Do not fumigate, use treated bait or other means of poisoning nuisance animals in areas where burrowing owls are known or suspected to occur (e.g., sites observed with nesting owls, designated use areas).
- Restrict the use of treated grain to poison mammals to the months of January and February.

(2) In the event that avoidance of burrowing owl or their burrows cannot be achieved, the project applicant, in consultation with CDFW, shall prepare a Burrowing Owl Exclusion Plan as indicated and following the latest edition of the Staff Report. Monitoring of the excluded owls shall be carried out in accordance with the latest edition of the Staff Report.

MM BIO-2b No more than 48 hours prior to the commencement of ground-disturbing activities that occur within 500 feet of the pond, the project applicant shall retain a qualified biologist to conduct a pre-construction survey for the western pond turtle in and around the pond. If one or more turtles are observed to be present, the applicant shall consult with CDFW for authorization to relocate the species to suitable habitat away from the construction zone. Regardless of the presence/absence of this species within the project site, exclusion fencing shall be installed around the pond to prevent the western pond turtle from reentering this area.

MM BIO-2c No more than 30 days prior to ground-disturbing activities that occur within 500 feet of potential nest trees for raptors or 250 feet of suitable nesting habitat for non-raptor bird species (i.e., trees, cattails, grassland) between February 1 and September 15, the project applicant retain a qualified biologist to conduct nesting bird surveys. The survey report shall be submitted to CDFW. If no active nests of Migratory Bird Treaty Act covered species are identified, then no further mitigation is required. If active nests of protected bird species are identified, the project applicant shall consult with the appropriate regulatory agencies to identify project-level mitigation requirements. Mitigation may include the following, based on current agency standards and policies:

- 1) The project applicant shall delay construction in the vicinity of active nest sites during the breeding season (February 1 through September 15) while the nest is occupied with adults or young. A qualified biologist shall monitor any occupied nest to determine when the nest is no longer used. If the construction cannot be delayed, avoidance measures shall include the establishment of a non-disturbance buffer zone around the nest site. The buffer zone for non-raptor species shall be 250 feet, or as determined in consultation with CDFW. The buffer zone shall be delineated with highly visible temporary construction fencing.

- 2) No intensive disturbance (e.g., heavy equipment operation associated with construction, or use of cranes) or other project-related activities that could cause nest abandonment or forced fledging shall be initiated within the established buffer zone of an active nest between February 1 and September 15.
- 3) If construction activities are unavoidable within the buffer zone, the project proponent shall consult with CDFW and retain a qualified biologist to monitor the nest site to determine if construction activities are disturbing the adult or young birds. If disturbance is observed, the biologist shall have authority to stop construction within the buffer zone until the bird species have vacated the nest of their own accord.
- 4) If fully protected species (white-tailed kites, golden eagles) are found to be nesting near the proposed construction area, their nests shall be completely avoided until the birds fledge. Avoidance shall include the establishment of a non-disturbance buffer zone of 500 feet, or as determined in consultation with the CDFW.

(Swainson's Hawk) Pre-construction surveys shall be conducted for a half-mile radius around all project activities and shall be completed for at least two survey periods immediately prior to project initiation. The surveys shall be conducted in accordance with CDFW's "Recommended timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley" (CDFG 2000), which identifies different survey windows throughout the pre-nesting and nesting season (ranging from January 1 through July 30/post-fledging) that have different survey methodologies and requirements, as set forth in the "Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California Central Valley."

If Swainson's Hawks are found to be nesting within 1,000 feet of the project site, nest protection buffers shall be established in consultation with CDFW or as required in any Fish and Game Section 2081 management authorization issued to the project by CDFW.

MM BIO-4

Prior to issuance of grading permits for Lots 5 and 6, the project applicant shall obtain all requisite approvals and permits from the appropriate resource agencies for impacts to waters of the United States and waters of the State. Such agencies may include but are not limited to the United States Army Corps of Engineers and the San Francisco Bay Regional Water Quality Control Board. Should the approved Jurisdictional Delineation determine that the off-site utility work would impact regulated resources, the applicant shall obtain the necessary regulatory permits and mitigate impacts in accordance with the regulatory agency requirements to achieve "no net loss." **(Does not apply to project).**

Conclusion

The conclusions from the Final EIR would remain unchanged with the approval of the facility.

Environmental Issue Area	Conclusion in EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
V. Cultural and Tribal Cultural Resources					
<i>Would the project:</i>					
a) Cause a substantial adverse change in the significance of a historical resource as pursuant to Section 15064.5?	Less than significant impact after mitigation	No	No	No	Mitigation Measure CUL-1
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	Less than significant impact after mitigation	No	No	No	Mitigation Measure CUL-1
c) Disturb any human remains, including those interred outside of formal cemeteries?	Less than significant impact after mitigation	No	No	No	Mitigation Measure CUL-4
<i>Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</i>					
d) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	Less than significant impact after mitigation	No	No	No	Mitigation Measure CUL-1
e) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section	Less than significant impact after mitigation	No	No	No	Mitigation Measure CUL-1

Environmental Issue Area	Conclusion in EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.					

Cultural Resources Supporting information is provided in Appendix B.

Discussion

- a) The Final EIR indicated that no historic resources have been previously recorded within the project site boundaries, or were observed during the field survey of the Napa Airport Corporate Center Project site. The results of the updated NWIC records search conducted in January 2020 confirmed these findings. However, subsurface construction activities associated with new development, such as trenching and grading, could potentially damage or destroy previously undiscovered historic resources. This was found to be a potentially significant impact, and Mitigation Measure CUL-1 was proposed that requires cessation of construction activities if previously undiscovered resources are encountered during construction. In the event of discovery, an evaluation of the resource or resources must be conducted by a qualified Archaeologist, and proper recovery and recordation procedures must be followed. Implementation of this mitigation measure would reduce impacts to a level of less than significant.

The proposed facility would result in soil disturbance and, thus, Mitigation Measure CUL-1 would apply. As such, the proposed project would not alter any cultural resources conclusions set forth in the Final EIR.

- b) The Final EIR concluded that no archaeological resources, have been recorded within the Napa Airport Corporate Center Project site, nor were any encountered during the field survey. The results of the updated NWIC records search conducted in January 2020 confirmed these findings. However, subsurface construction activities associated with new development, such as trenching and grading, could potentially damage or destroy previously undiscovered archaeological resources. This was found to be a potentially significant impact, and Mitigation Measure CUL-1 was proposed that requires cessation of construction activities if previously undiscovered resources are encountered during construction. In the event of discovery, an evaluation of the resource or resources must be conducted by a qualified Archaeologist, and proper recovery and recordation procedures must be followed. Implementation of this mitigation measure would reduce impacts to a level of less than significant.

The proposed facility would result soil disturbance and, thus, Mitigation Measure CUL-1 would apply. As such, the proposed project would not alter any cultural resources conclusions set forth in the Final EIR.

- c) The Final EIR concluded that no known human remains were known to be present within the Napa Airport Corporate Center Project site, nor were any encountered during the field survey. The results of the updated NWIC records search conducted in January 2020 confirmed these findings. However, subsurface construction activities associated with new development such as trenching and grading could potentially encounter previously undiscovered human remains. This was determined to be a potentially significant impact. Accordingly, Mitigation Measure CUL-4 requires notification of the Napa County Coroner and the Native American Heritage Commission in the event human remains are encountered and the implementation of appropriate treatment procedures. Implementation of this mitigation measure would reduce impacts to a level of less than significant.

The proposed facility would involve soil disturbance and, thus, Mitigation Measure CUL-4 would apply. As such, the proposed project would not alter any cultural resources conclusions set forth in the Final EIR.

- d) The Final EIR indicated that the Napa Airport Corporate Center Project site does not contain any Tribal Cultural Resources (TCRs) listed on a federal, state, or local register of historic resources. In addition, no historic or archaeological resources were found during the field survey of the project site. The results of the updated NWIC records search conducted in January 2020 confirmed these findings. However, subsurface construction activities associated with new development, such as trenching and grading, could potentially damage or destroy previously undiscovered and eligible TCRs. This was found to be a potentially significant impact, and Mitigation Measure CUL-1 was proposed that requires cessation of construction activities if previously undiscovered resources are encountered during construction. In the event of discovery, an evaluation of the resource or resources must be conducted by a qualified Archaeologist, and proper recovery and recordation procedures must be followed. Implementation of this mitigation measure would reduce impacts to a level of less than significant.

The proposed facility would result in soil disturbance and, thus, Mitigation Measure CUL-1 would apply. As such, the proposed project would not alter any cultural resources conclusions set forth in the Final EIR.

- e) On April 11, 2013, a sacred lands search and request for a Native American contact list for the area was sent to the Native American Heritage Commission (NAHC) (Appendix B). On January 24, 2014, the NAHC responded with a list of Native American contacts, which failed to indicate the presence of Native American cultural resources within the immediate project area. A contact list of individuals and Native American groups was provided. Cardno ENTRIX drafted contact letters on behalf of the lead agency to all individuals on the contact list provided by the NAHC. On January 28, 2014, letters were mailed to each individual listed on the NAHC contact

list. This list of individuals included Chairperson Charlie White for the Cortina Band of Indians, Chairperson Marshall McKay and Native Cultural Renewal Committee members Cynthia Clarke and Leland Kinter of the Yocha Dehe Wintun Nation, and Mr. Kesner Flores.

On February 21, 2014, Mr. James Sarmiento, Yocha Dehe Wintun Nation Cultural Resources Manager, responded by letter to state that based on the information provided to the Yocha Dehe Wintun Nation, there are known cultural resources near the project. Mr. Sarmiento expressed his concern that potential impacts to cultural resources would need to be considered during the planning stages for the project. Cardno ENTRIX responded to Mr. Sarmiento by letter, stating that potential impacts to cultural resources would be considered during the planning phases of the project. On May 15, 2014, Cardno ENTRIX Cultural Resources Specialist, Michella Rossi, conducted follow-up phone calls to all individuals listed on the NAHC contact list who had not responded. Ms. Rossi left detailed messages at all numbers called. She was able to reach Mr. Flores, who requested a copy of the Project Location Map, which Ms. Rossi provided to him via email that same day. Ms. Rossi also reached Chairperson Wright who requested another week to respond to the letter. On May 23, 2014, Ms. Rossi contacted Chairperson Wright again, as requested. At that time, Chairperson Wright said he did not have any comments or concerns pertaining to the project.

NVWMA, in its capacity as lead agency, has not identified any significant TCRs pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. However, subsurface construction activities associated with new development, such as trenching and grading, could potentially damage or destroy previously undiscovered TCRs. This was found to be a potentially significant impact, and Mitigation Measure CUL-1 was proposed that requires cessation of construction activities if previously undiscovered resources are encountered during construction. In the event of discovery, an evaluation of the resource or resources must be conducted by a qualified Archaeologist, and proper recovery and recordation procedures must be followed. Implementation of this mitigation measure would reduce impacts to a level of less than significant.

The proposed facility would result in soil disturbance and, thus, Mitigation Measure CUL-1 would apply. As such, the proposed project would not alter any cultural resources conclusions set forth in the Final EIR.

Mitigation Measures

- MM CUL-1** If prehistoric or historic-period archaeological resources are encountered, all construction activities within 100 feet of the find shall halt and the City of American Canyon shall be notified. Prehistoric archaeological materials may include obsidian and chert flakedstone tools (e.g., projectile points, knives, scrapers) or toolmaking debris; culturally darkened soil (“midden”) containing heat-affected rocks, artifacts, or shellfish remains; and stone milling equipment (e.g., mortars, pestles, handstones, or milling slabs); and battered stone tools, such as hammerstones and pitted stones. Historic-period materials might include stone, concrete, or adobe footings and walls;

filled wells or privies; and deposits of metal, glass, and/or ceramic refuse. A Secretary of the Interior-qualified archaeologist shall inspect the findings within 24 hours of discovery. If it is determined that the project could damage a historical resource or a unique archaeological resource (as defined pursuant to the CEQA Guidelines), mitigation shall be implemented in accordance with PRC Section 21083.2 and Section 15126.4 of the CEQA Guidelines, with a preference for preservation in place. Consistent with Section 15126.4(b)(3), this may be accomplished through planning construction to avoid the resource; incorporating the resource within open space; capping and covering the resource; or deeding the site into a permanent conservation easement. If avoidance is not feasible, a qualified archaeologist shall prepare and implement a detailed treatment plan ~~in consultation with the City of American Canyon~~. Treatment of unique archaeological resources shall follow the applicable requirements of PRC Section 21083.2. Treatment for most resources would consist of (but would not be not limited to) sample excavation, artifact collection, site documentation, and historical research, with the aim to target the recovery of important scientific data contained in the portion(s) of the significant resource to be impacted by the Project. The treatment plan shall include provisions for analysis of data in a regional context, reporting of results within a timely manner, curation of artifacts and data at an approved facility, and dissemination of reports to local and state repositories, libraries, and interested professionals.

- MM CUL-4** In the event of discovery or recognition of any human remains during construction activities, such activities within 100 feet of the find shall cease until the Napa County Coroner has been contacted to determine that no investigation of the cause of death is required. The Native American Heritage Commission (NAHC) shall be contacted within 24 hours if it is determined that the remains are Native American. The NAHC will then identify the person or persons it believes to be the most likely descendant from the deceased Native American (PRC Section 5097.98), who in turn would make recommendations to ~~NVWMA the City of American Canyon~~ for the appropriate means of treating the human remains and any associated funerary objects (CEQA Guidelines Section 15064.5(d)).

Conclusion

The conclusions from the Final EIR would remain unchanged with the approval of the facility.

Environmental Issue Area	Conclusion in EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
VI. Energy					
<i>Would the project:</i>					
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	Less than significant impact	No	No	No	None
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	Less than significant impact	No	No	No	None

Energy Supporting Information is provided in Appendix A.

Discussion

a-b) The Final EIR concluded that the Napa Airport Corporate Center Project would not result in the inefficient, unnecessary, or wasteful use of energy. The Final EIR noted that the project site was within 75 miles of major industrial and intermodal destinations and, thus, was well positioned to serve these areas, perhaps with shorter trip lengths, thereby reducing *transportation* fuel consumption. The Final EIR also noted that the proposed project would be subject to the latest adopted edition of the Title 24 energy efficiency standards, which are widely recognized as the most stringent in the United States. The Final EIR determined that impacts would be less than significant.

During construction, energy would be used for off-site vehicle fuel consumption, on-site equipment fuel consumption, and a construction office trailer. In total, during construction the project would consume 101,772 gallons of fuel and 16,038 kilowatt hours (kWh). The construction schedule used represents a worst-case analysis scenario for the proposed project because improvements in technology and more stringent regulatory requirements would result in lower energy consumption for construction equipment as the analysis year increases.

The operational phase of the proposed project would consume energy as part of building operations and transportation activities. The proposed facility would consume an estimated 1,081,150 kWh per year of electricity for building operation. The proposed facility would not

increase throughput of the Devlin Road Transfer Station and, thus, there would be no net increase in the number of daily truck trips or transportation fuel use. The facility would be designed and constructed in accordance with the applicable Title 24 energy efficiency standards. As such, the proposed project would not alter any energy conclusions set forth in the Final EIR.

Mitigation Measures

None.

Conclusion

The conclusions from the Final EIR would remain unchanged with the approval of the facility.

Environmental Issue Area	Conclusion in EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
VII. Geology, Seismicity, and Soils					
<i>Would the project:</i>					
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:					
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	Less than significant impact	No	No	No	Mitigation Measure GEO-1
ii) Strong seismic ground shaking?	Less than significant impact after mitigation	No	No	No	Mitigation Measure GEO-1
iii) Seismic-related ground failure, including liquefaction?	Less than significant impact after mitigation	No	No	No	Mitigation Measure GEO-1
iv) Landslides?	Less than significant impact after mitigation	No	No	No	Mitigation Measure GEO-1
b) Result in substantial soil erosion or the loss of topsoil?	Less than significant impact after mitigation	No	No	No	Mitigation Measure HYD-1a
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	Less than significant impact after mitigation	No	No	No	Mitigation Measure GEO-1

Environmental Issue Area	Conclusion in EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	No impact	No	No	No	None
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	No impact	No	No	No	None
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Less than significant impact after mitigation	No	No	No	Mitigation Measure CUL-3

Discussion

- a) The Final EIR concluded that the Napa Airport Corporate Center Project would not be susceptible to fault rupture, ground failure, or landsliding due to the geological characteristics of the project site. The Final EIR found that the project may be susceptible to strong ground shaking during a seismic event and set forth Mitigation Measure GEO-1, which requires project structures to be designed and constructed in accordance with the California Building Standards Code, to reduce impacts to a level of less than significant.

The proposed facility may be susceptible to strong ground shaking and, therefore, it would be required to implement Mitigation Measure GEO-1. As such, the proposed facility would not alter any geology and soils conclusions set forth in the Final EIR.

- b) The Final EIR concluded that there could be potential erosion impacts resulting from grading and excavation during construction activities. During these activities, the potential exists for surface water to carry sediment from on-site erosion into the stormwater system and local waterways, and soil erosion may occur along project boundaries during construction in areas where temporary soil storage is required. The Final EIR set forth Mitigation Measure HYD-1a, which requires implementation of erosion control measures and which would reduce impacts to a level of less than significant.

The proposed facility would involve ground disturbance that may cause erosion and sedimentation, and, thus Mitigation Measure HYD-1a would apply to reduce such impacts to a less than significant level. As such, the proposed facility would not alter any geology and soils conclusions set forth in the Final EIR.

- c) The Final EIR concluded that the Napa Airport Corporate Center Project is underlain by silty clay soils that are suitable to support urban development. The Final EIR found that impacts associated with unstable geologic units or soils were less than significant.

The development of the proposed facility would involve standard grading and soil engineering practices that would ensure that the structure and paved areas are properly supported and, thus, eliminate the potential for ground failure. As such, the proposed facility would not alter any geology and soils conclusions set forth in the Final EIR.

- d) The Final EIR concluded that the Napa Airport Corporate Center Project is underlain by Clear Lake clay, Haire loam, 2-9 percent slopes, and Fagan clay loam, 5-15 percent slopes. All of these soils have expansive properties. As such, the Final EIR set forth Mitigation Measure GEO-1 to reduce the impact to a level of less than significant.

The proposed facility may be susceptible to shrink and swell from expansive soils and, therefore, it would be required to implement Mitigation Measure GEO-1. As such, the proposed facility would not alter any geology and soils conclusions set forth in the Final EIR.

- e) The Final EIR indicated that the Napa Airport Corporate Center Project would be served by the City of American Canyon's municipal sewer system; no septic or alternative wastewater disposal systems would be employed. The Final EIR concluded that no impacts would occur.

The proposed facility would be served by the City of American Canyon's municipal sewer system; no septic or alternative wastewater disposal systems would be employed. As such, the proposed facility would not alter any geology and soils conclusions set forth in the Final EIR.

- f) The Final EIR concluded that no known recorded paleontological resources were present within the Napa Airport Corporate Center Project site. However, subsurface construction activities associated with new development such as trenching and grading could potentially damage or destroy previously undiscovered paleontological resources. This was determined to be a potentially significant impact. Accordingly, Mitigation Measure CUL-3 requires a qualified paleontologist to evaluate any fossils encountered during construction. Implementation of this mitigation measure would reduce impacts to a level of less than significant.

The proposed facility would involve soil disturbance and, thus, Mitigation Measure CUL-3 would apply. As such, the proposed project would not alter any geology and soils conclusions set forth in the Final EIR.

Mitigation Measures

- MM GEO-1** Prior to ~~construction~~ the issuance of building permits for each structure, NVWMA ~~the project applicant shall submit~~ shall retain a qualified consultant to prepare a design-level Geotechnical Investigation ~~to the City of American Canyon for review and approval~~. The investigation shall be prepared by a qualified engineer and identify grading and building practices necessary to achieve compliance with the latest adopted edition of the California Building Standards Code geologic, soils, and seismic requirements, including abatement of expansive soil conditions. The report shall also determine the final design parameters for walls, foundations, foundation slabs, and surrounding related improvements (e.g., utilities roadways, parking lots, and sidewalks). The measures identified in the approved report shall be incorporated into the project plans and all applicable construction-related permits.
- MM HYD-1a** Prior to ~~grading~~ issuance of ~~grading permits for the proposed project~~, NVWMA shall retain a qualified consultant to prepare ~~the City of American Canyon shall verify that the applicant has prepared~~ a Stormwater Pollution Prevention Plan (SWPPP) in accordance with the requirements of the statewide Construction General Permit. The SWPPP shall be designed to address the following objectives: (1) all pollutants and their sources, including sources of sediment associated with construction, construction site erosion, and all other activities associated with construction activity are controlled; (2) where not otherwise required to be under a Regional Water Quality Control Board permit, all non-stormwater discharges are identified and either eliminated, controlled, or treated; (3) site best management practices (BMPs) are effective and result in the reduction or elimination of pollutants in stormwater discharges and authorized non-stormwater discharges from construction activity; and (4) stabilization BMPs are installed to reduce or eliminate pollutants after construction are completed. The SWPPP shall be prepared by a qualified SWPPP developer. The SWPPP shall include the minimum BMPs required for the identified Risk Level. BMP implementation shall be consistent with the BMP requirements in the most recent version of the California Stormwater Quality Association Stormwater Best Management Handbook-Construction or the Caltrans Stormwater Quality Handbook Construction Site BMPs Manual.
- MM CUL-3** If potential fossils are discovered during project implementation, all earthwork or other types of ground disturbance within 100 feet of the find shall stop immediately until a qualified professional paleontologist can assess the nature and importance of the find. The paleontologist shall report his or her findings to NVWMA ~~the City of American Canyon~~. Based on the scientific value or uniqueness of the find, the paleontologist shall either record the find and recommend that NVWMA ~~the City of American Canyon~~ allow work to continue, or recommend salvage and recovery of the fossil. The paleontologist, if required, shall propose modifications to the stop-work radius based on the nature of the find, site geology, and the activities occurring on the site. If treatment and salvage is required, recommendations will be consistent

with Society of Vertebrate Paleontology guidelines and currently accepted scientific practice. If required, treatment for fossil remains shall include preparation and recovery of fossil materials so that they can be housed in an appropriate museum or university collection, and, if required, shall also include preparation of a report for publication describing the finds.

Conclusion

The conclusions from the Final EIR would remain unchanged with the approval of the facility.

Environmental Issue Area	Conclusion in EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
VIII. Greenhouse Gas Emissions					
<i>Would the project:</i>					
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Less than significant impact after mitigation	No	No	No	Mitigation Measures AIR-7a and AIR-7b
b) Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Less than significant impact after mitigation	No	No	No	Mitigation Measures AIR-7a and AIR-7b

Greenhouse Gas Emissions Supporting Information is provided in Appendix A.

Discussion

a-b) The Final EIR found that Napa Airport Corporate Center Project-related construction emissions would be as much as 2,048 metric tons of carbon dioxide equivalents (MTCO_{2e}) and concluded that emissions would be less than significant because there was no adopted threshold at the time the EIR was prepared. The Final EIR found that operational emissions would be as much as 9,696 MTCO_{2e} in Year 2020. This amount of emissions would be within the City of American Canyon’s Energy Efficiency and Climate Action Plan emissions targets but would exceed the BAAQMD’s service population ratio. The Final EIR set forth Mitigation Measures AIR-7a and AIR-7b, which require pedestrian improvements to the gas station on Lot 1. Since the effectiveness of this measure was uncertain, this impact was determined to be significant and unavoidable.

The proposed facility would house the existing construction and demolition debris recycling operation that occurs within the neighboring Devlin Road Transfer Station. The facility would result in no net increase in the facility’s permitted throughput (1,440 tons of receipt and 600 truck trips per day) and, thus, there would be no net increase in trip generation. Because Lot 4 represented approximately 44 percent of the Napa Airport Corporate Center’s square footage (as evaluated under Option 1 of the Final EIR), the proposed project would substantially reduce the trip generation potential and the corresponding greenhouse gas impacts disclosed in the Final EIR. Long-term operations of the project, including amortized construction emissions, would generate approximately 463 MT CO_{2e} in the 2030 operational year. The estimated total

annual GHG emissions generated by the project in the year 2030 do not exceed the applicable threshold of 660 MT CO₂e/year. Therefore, the proposed project's generation of GHG emissions would not result in a significant impact on the environment. It was also determined that implementation of the proposed project would not conflict with the reduction measures proposed in SB 32. Considering this information, the project would not conflict with any applicable plan, policy, or regulation of an agency adopted to reduce the emissions of GHGs. Mitigation Measures AIR-7a and AIR-7b would not apply since the project would be developed on Lot 4. As such, the proposed facility would not alter any greenhouse gas conclusions set forth in the Final EIR.

Mitigation Measures

- MM AIR-7a** If Option 2 is developed, the project applicant shall require the installation of a minimum of four electric vehicle charging stations on the project site that are available for use by the public. **(Does not apply to project).**
- MM AIR-7b** If Option 2 is developed, the project applicant shall provide an on-site sidewalk system that provides connectivity between the proposed warehouse parcels and the proposed restaurant and mini-mart. **(Does not apply to project).**

Conclusion

The conclusions from the Final EIR would remain unchanged with the approval of the facility.

Environmental Issue Area	Conclusion in EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
IX. Hazards and Hazardous Materials					
<i>Would the project:</i>					
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Less than significant impact after mitigation	No	No	No	Mitigation Measures HAZ-1a, HAZ-1b, and HAZ-1c
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Less than significant impact	No	No	No	None
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	No impact	No	No	No	None
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	Less than significant impact	No	No	No	None
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport,	Less than significant impact after mitigation	No	No	No	Mitigation Measure LU-3

Environmental Issue Area	Conclusion in EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
would the project result in a safety hazard or excessive noise for people residing or working in the project area?					
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Less than significant impact	No	No	No	None
g) Expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?	No impact	No	No	No	None

Discussion

a–b) The Final EIR concluded that the Napa Airport Corporate Center Project would involve the use of hazardous materials (e.g., gasoline, diesel, oils, greases, mechanical fluids, etc.) during construction and set forth Mitigation Measure HAZ-1a and HAZ-1c, which require training and proper handling procedures would be implemented to reduce impacts to less than significant. The Final EIR indicated that the gas station contemplated on Lot 1 would engage in the routine use and storage of acutely hazardous materials and set forth Mitigation Measure HAZ-1b requiring the preparation of a Risk Management Plan to reduce impacts to less than significant.

The proposed facility would be used for construction and demolition debris recycling that currently occur at the neighboring Devlin Road Transfer Station. Construction of the facility would involve the use of common hazardous materials and, thus, Mitigation Measures HAZ-1a and HAZ-1c would apply. However, the proposed facility would not develop a gas station and construction and demolition debris does not involve the routine handling of acutely hazardous materials and, therefore, Mitigation Measure HAZ-1b would not apply. As such, the proposed facility would not alter any hazardous materials conclusions set forth in the Final EIR.

c) The Final EIR concluded that the Napa Airport Corporate Center Project is not located within a 0.25-mile of a school and, therefore, would not have the potential to expose schools to hazardous materials or emissions. No impact would occur.

The facility would be developed on Lot 4 of the Napa Airport Corporate Center Project and, thus, have no potential to expose schools to hazardous materials or emissions. As such, the proposed facility would not alter any hazardous materials conclusions set forth in the Final EIR.

- d) The Final EIR concluded that the Napa Airport Corporate Center Project is not located on a list of hazardous materials compiled pursuant to Government Code 65962.5 and that there are no hazardous materials site listed as 'Open' within 0.5-mile of the project site. The Final EIR indicated that impacts would be less than significant.

The facility would be developed on Lot 4 of the Napa Airport Corporate Center Project and, thus, not be located on a list of hazardous materials compiled pursuant to Government Code 65962.5. As such, the proposed facility would not alter any hazardous materials conclusions set forth in the Final EIR.

- e) The Final EIR indicated that the Napa Airport Corporate Center Project is located in Zone D of the Napa County Airport Land Use Compatibility Plan and found that the end uses of the project (e.g., industrial and business park) are compatible with the airport. The Final EIR did note that the existing 3.5-acre pond/wetland area on Lots 5 and 6 would be enhanced and has the potential to be a wildlife attractant. The Final EIR set forth Mitigation Measure LU-3 that requires the applicant to prepare and implement a Wildlife Management Plan to limit the wildlife attractant potential of the pond/wetland area and reduce impacts to a level of less than significant.

The proposed facility would be used for construction and demolition debris recycling that currently occur at the neighboring Devlin Road Transfer Station. This end use was previously found to be compatible with the Napa County Airport. The proposed facility would be developed on Lot 4 and would alter the existing pond/wetland area on Lots 5 and 6. As such, the proposed facility would not alter any hazardous materials conclusions set forth in the Final EIR.

- f) The Final EIR indicated that all of lots within the Napa Airport Corporate Center Project would be served by two points of access and, thus, compliant with the California Fire Code. The EIR also noted that Devlin Road is planned to be extended to Green Island Road, which would provide an additional emergency response and evacuation route for project end users. The Final EIR concluded that impacts would be less than significant.

The proposed facility would take access from an internal connection with the Devlin Road Transfer Station and a driveway connection with Devlin Road. Haul trips would all occur through the existing Devlin Road Transfer Station access point; the Devlin Road driveway would be limited to operations and safety. As such, two points of access would be provided. As such, the proposed facility would not alter any hazardous materials conclusions set forth in the Final EIR.

- g) The Final EIR concluded that the Napa Airport Corporate Center Project is surrounded by urban development on three sides and undeveloped land on the fourth and is not susceptible to wildland fires. No impact would occur.

The facility would be developed on Lot 4 of the Napa Airport Corporate Center Project and, thus, have no susceptibility to wildland fires. As such, the proposed facility would not alter any hazardous materials conclusions set forth in the Final EIR.

Mitigation Measures

- MM HAZ-1a** Prior to construction, all contractor and subcontractor personnel shall receive training regarding the appropriate work practices necessary to effectively comply with the applicable environmental laws and regulations, including, without limitation, hazardous material spill prevention and response measures.
- MM HAZ-1b** Prior to issuance of the certificate of occupancy for any uses that involve the storage or use of acutely hazardous materials, the tenant shall consult with the California Emergency Management Agency to determine the guidelines and regulations applicable to the operations. If required, tenants shall prepare a Risk Management Plan consistent with the California Accidental Release Prevention (CalARP) Program prior to undertaking any storage or use of acutely hazardous materials. **(Does not apply to project).**
- MM HAZ-1c** During construction and operations, hazardous materials shall not be disposed of or released onto the ground, the underlying groundwater, or any surface water. Totally enclosed containment shall be provided for all trash. All hazardous construction waste shall be removed to a hazardous waste facility permitted or otherwise authorized to treat, store, or dispose of such materials.
- MM LU-3** Prior to issuance of the first grading permit for Lot 5, the project applicant shall retain a qualified biologist to evaluate whether the open space area would attract large flocks of birds to the site. If the biologist determines that the open space would not attract large flocks of birds, no further mitigation is necessary. Otherwise, a wildlife management plan focused on the deterrence of large flocks of birds would be prepared by a qualified biologist and implemented for the preserved wetland area. The plan shall incorporate applicable Federal Aviation Administration (FAA) guidance for wildlife management specific to large flocks of birds and provide recommendations for the design and operation of the wetland area to ensure that it does not serve as an attractant for large flocks of birds that may be potentially incompatible with aviation operations. As part of plan development, the applicant shall consult with Napa County Airport representatives. The City of American Canyon shall confirm that the wildlife management plan's recommendations are reflected in the design and maintenance plans for the preserved wetlands. The plan shall:
- If necessary, refine or adapt water management designs to comply with the guidance set forth in the FAA guidance. Once developed, the project proponent shall provide copies of its preserved wetland management plans to the airport management for review by an FAA qualified Wildlife Biologist to confirm that the

proposed slope design and bio retention plantings are consistent with Advisory Circular 150/5200-33B.

- Refine or adapt project designs to include materials that will not be attractive to potentially hazardous wildlife (i.e., large flocks of birds). The project proponent should provide copies of its proposed plans and plant palettes to airport management for review by an FAA-qualified Wildlife Hazard Damage Biologist to confirm that the preserved wetlands will be consistent with airport operations.
- Develop design standards to address aviation and avian hazard management concerns. The project applicant shall develop specific design standards for incorporation into lease documents that address avian hazard management. For example, site users shall be directed to store all refuse in covered bins or dumpsters and equip signs and light standards with non-perching devices.
- Establish a process for ongoing coordination with the Napa County Airport staff regarding avian management, facility management procedures, and airport operations so that changes in avian activity during or following project construction can be identified and addressed. **(Does not apply to project).**

Conclusion

The conclusions from the Final EIR would remain unchanged with the approval of the facility.

Environmental Issue Area	Conclusion in EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
X. Hydrology and Water Quality					
<i>Would the project:</i>					
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	Less than significant impact after mitigation	No	No	No	Mitigation Measures HYD-1a and HYD-1b
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	Less than significant impact	No	No	No	None
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	Less than significant impact	No	No	No	None
(i) result in substantial erosion or siltation on- or off-site;	Less than significant impact	No	No	No	None
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	Less than significant impact	No	No	No	None

Environmental Issue Area	Conclusion in EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	Less than significant impact	No	No	No	None
(iv) impede or redirect flood flows?	Less than significant impact	No	No	No	None
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	No impact	No	No	No	None
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	No impact	No	No	No	None

Discussion

- a) The Final EIR indicated that the Napa Airport Corporate Center Project’s construction activities have the potential to result in stormwater pollution. The Final EIR set forth Mitigation Measure HYD-1a, which requires implementation of a Stormwater Pollution Prevention Plan, to reduce impacts to a level of less than significant. The Final EIR found that operational activities have the potential to result in stormwater pollution. The Final EIR set forth Mitigation Measure HYD-1b, which requires implementation of a Stormwater Control Plan, to reduce impacts to a level of less than significant.

The development of the proposed facility would result in ground disturbance and, thus, Mitigation Measure HYD-1a would apply. One of the purposes of the proposed facility is relocate the existing outdoor construction and demolition debris recycling to within a partially enclosed building to better manage stormwater runoff. Nonetheless, Mitigation Measure HYD-1b would also be implemented. As such, the proposed facility would not alter any hydrology conclusions set forth in the Final EIR.

- b) The Final EIR indicated that the Napa Airport Corporate Center Project would not contribute to groundwater overdraft because the City of American Canyon relies on imported water. The Final EIR noted that the gas station (Option 2) on Lot 1 would involve the use of underground storage tanks and would be required to be permitted by the County of Napa to ensure they meet all environmental health and safety requirements. The Final EIR concluded that groundwater impacts would be less than significant.

The proposed facility would primarily use water for landscape irrigation. Depending on the availability of infrastructure, all of the irrigation demand may be provided by recycled water or non-potable well water. The existing water use associated with the construction and demolition debris recycling operation would be relocated to the project site and, thus, not net increase would occur from this aspect of the project. In total, the proposed facility would have little to no net increase in demand for potable water or non-potable well water. As such, the proposed facility would not alter any hydrology conclusions set forth in the Final EIR.

- c) The Final EIR indicated that the Napa Airport Corporate Center Project would increase impervious surface coverage and, thus, have the potential to contribute runoff that may exceed the capacity of existing or planned stormwater drainage systems. The Final EIR noted the proposed project would install a storm drainage system consisting of vegetated bio swales, inlets, underground piping, and detention basins sized to the City of American Canyon's design standards. The EIR concluded that impacts would be less than significant.

The proposed facility would install a storm drainage system consisting of underground piping ranging from 8- to 18-inches in diameter. Runoff would be conveyed south to a bio-retention basin installed within Parcel 1B adjacent to the Devlin Road overcrossing, where it would percolate into the soil or evaporate. For these reasons, the facility would not contribute to downstream flooding. As such, the proposed facility would not alter any hydrology conclusions set forth in the Final EIR.

- d) The Final EIR found that the Napa Airport Corporate Center Project is not near any body of water susceptible to seiches or tsunamis and is not within any flood hazard zones. The EIR concluded that no impact would occur.

The proposed facility would be developed on Lot of the Napa Airport Corporate Center Project site and is not susceptible to seiches, tsunamis, or flood hazard zones. As such, the proposed facility would not alter any hydrology conclusions set forth in the Final EIR.

- e) The Final EIR concluded that the Napa Airport Corporate Center Project is not subject to a water quality control plan or sustainable groundwater management plan. The EIR concluded that no impact would occur.

The proposed facility would be developed on Lot of the Napa Airport Corporate Center Project site and is not subject to water quality control plan or sustainable groundwater management plans. As such, the proposed facility would not alter any hydrology conclusions set forth in the Final EIR.

Mitigation Measures

MM HYD-1a ~~Prior to grading issuance of grading permits for the proposed project, NVWMA shall retain a qualified consultant to prepare a~~ Prior to grading issuance of grading permits for the proposed project, NVWMA shall retain a qualified consultant to prepare a ~~the City of American Canyon shall verify that the applicant has prepared a~~ Stormwater Pollution Prevention Plan (SWPPP) in accordance with the requirements of the statewide Construction General Permit. The SWPPP shall be designed to address the following objectives: (1) all pollutants and their sources, including sources of sediment associated with construction, construction site erosion, and all other activities associated with construction activity are controlled; (2) where not otherwise required to be under a Regional Water Quality Control Board permit, all non-stormwater discharges are identified and either eliminated, controlled, or treated; (3) site best management practices (BMPs) are effective and result in the reduction or elimination of pollutants in stormwater discharges and authorized non-stormwater discharges from construction activity; and (4) stabilization BMPs are installed to reduce or eliminate pollutants after construction are completed. The SWPPP shall be prepared by a qualified SWPPP developer. The SWPPP shall include the minimum BMPs required for the identified Risk Level. BMP implementation shall be consistent with the BMP requirements in the most recent version of the California Stormwater Quality Association Stormwater Best Management Handbook-Construction or the Caltrans Stormwater Quality Handbook Construction Site BMPs Manual.

MM HYD-1b ~~Prior to grading issuance of building permits for the proposed project, NVWMA shall retain a qualified consultant to prepare~~ Prior to grading issuance of building permits for the proposed project, NVWMA shall retain a qualified consultant to prepare ~~the project applicant shall prepare a~~ Stormwater Control Plan that includes post-construction stormwater controls in the site design to satisfy requirements of the Phase II Small MS4 Permit. ~~This shall include a review of the final Stormwater Control Plan by the City of American Canyon to ensure that the required controls are in place.~~

Provision E.12.h of the MS4 Permit requires that an operation and maintenance program be implemented for post-construction stormwater management features. Responsible parties and funding for long-term maintenance of all BMPs must be specified. This plan shall specify a regular inspection schedule of stormwater treatment facilities in accordance with the requirements of the MS4 Permit. Reports documenting inspections and any remedial action conducted shall be submitted regularly to the City for review and approval.

Conclusion

The conclusions from the Final EIR would remain unchanged with the approval of the facility.

Environmental Issue Area	Conclusion in EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
XI. Land Use and Planning					
<i>Would the project:</i>					
a) Physically divide an established community?	No impact	No	No	No	None
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	Less than significant impact after mitigation	No	No	No	Mitigation Measure LU-3

Discussion

- a) The Final EIR indicated that the Napa Airport Corporate Center Project site was undeveloped and did not support any established communities. The Final EIR concluded that new impact would occur.

The facility would be developed on Lot 4 of the Napa Airport Corporate Center Project site, which is undeveloped. As such, the proposed facility would not alter any land use conclusions set forth in the Final EIR.

- b) The Final EIR indicated that the Napa Airport Corporate Center Project was consistent with the City of American Canyon General Plan land use designation of 'Industrial' and the Napa Valley Business Park Specific Plan zoning of 'Business/Industrial Park.' The Final EIR found that the proposed pond/wetland area on Lot 5 may be a wildlife attractant and, thus, may conflict with the Napa County Airport Land Use Compatibility Plan. The Final EIR set forth Mitigation Measure LU-3, which requires the implementation of a wildlife management plan, to reduce impacts to a level of less than significant.

The facility would be developed on Lot 4 of the Napa Airport Corporate Center Project site. As a public facility, the proposed construction and demolition debris recycling facility is exempt from General Plan and zoning. Nonetheless, construction and demolition debris recycling currently occurs at the neighboring Devlin Road Transfer Station and, thus, represents an existing land use activity in the project vicinity. Accordingly, it would be compatible with existing and planned uses within the Napa Airport Corporate Center Project and Napa Logistics Park Project. As such, the proposed facility would not alter any land use conclusions set forth in the Final EIR.

Mitigation Measures

MM LU-3

Prior to issuance of the first grading permit for Lot 5, the project applicant shall retain a qualified biologist to evaluate whether the open space area would attract large flocks of birds to the site. If the biologist determines that the open space would not attract large flocks of birds, no further mitigation is necessary. Otherwise, a wildlife management plan focused on the deterrence of large flocks of birds would be prepared by a qualified biologist and implemented for the preserved wetland area. The plan shall incorporate applicable Federal Aviation Administration (FAA) guidance for wildlife management specific to large flocks of birds and provide recommendations for the design and operation of the wetland area to ensure that it does not serve as an attractant for large flocks of birds that may be potentially incompatible with aviation operations. As part of plan development, the applicant shall consult with Napa County Airport representatives. The City of American Canyon shall confirm that the wildlife management plan's recommendations are reflected in the design and maintenance plans for the preserved wetlands. The plan shall:

- If necessary, refine or adapt water management designs to comply with the guidance set forth in the FAA guidance. Once developed, the project proponent shall provide copies of its preserved wetland management plans to the airport management for review by an FAA qualified Wildlife Biologist to confirm that the proposed slope design and bio retention plantings are consistent with Advisory Circular 150/5200-33B.
- Refine or adapt project designs to include materials that will not be attractive to potentially hazardous wildlife (i.e., large flocks of birds). The project proponent should provide copies of its proposed plans and plant palettes to airport management for review by an FAA-qualified Wildlife Hazard Damage Biologist to confirm that the preserved wetlands will be consistent with airport operations.
- Develop design standards to address aviation and avian hazard management concerns. The project applicant shall develop specific design standards for incorporation into lease documents that address avian hazard management. For example, site users shall be directed to store all refuse in covered bins or dumpsters and equip signs and light standards with non-perching devices.
- Establish a process for ongoing coordination with the Napa County Airport staff regarding avian management, facility management procedures, and airport operations so that changes in avian activity during or following project construction can be identified and addressed. **(Does not apply to project).**

Conclusion

The conclusions from the Final EIR would remain unchanged with the approval of the facility.

Environmental Issue Area	Conclusion in EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
XII. Mineral Resources					
<i>Would the project:</i>					
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?	No impact	No	No	No	None
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	No impact	No	No	No	None

Discussion

a–b) The Final EIR concluded that the Napa Airport Corporate Center Project site does not support mineral extraction activities and is not identified as a known mineral deposit site by the City of American Canyon General Plan or the State. The Final EIR concludes that no impacts would occur.

The proposed facility would be developed on Lot 4 of the Napa Airport Corporate Center Project site and, thus, would not be located on a known mineral deposit site. As such, the proposed facility would not alter any mineral resources conclusions set forth in the Final EIR.

Mitigation Measures

None.

Conclusion

The conclusions from the Final EIR would remain unchanged with the approval of the facility.

Environmental Issue Area	Conclusion in EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
XIII. Noise					
<i>Would the project:</i>					
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Less than significant impact after mitigation	No	No	No	Mitigation Measures NOI-1a and NOI-1b
b) Generation of excessive groundborne vibration or groundborne noise levels?	Less than significant impact	No	No	No	None
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	Less than significant impact	No	No	No	None

Noise Supporting Information is provided in Appendix C.

Discussion

- a) The Final EIR evaluated the Napa Airport Corporate Center Project’s construction and operational noise. Construction activities would generate noise levels that would exceed City standards, and result in a substantial temporary increase in noise levels at a nearby residential receptor. The Final EIR set forth Mitigation Measure NOI-1a, which requires the construction of noise barrier, and Mitigation Measure NOI-1b, which limits construction activities to permissible daytime hours and requires noise abatement measures. The Final EIR concludes

that implementation of these mitigation measures would reduce impacts to a less than significant level.

The closest sensitive receptor to proposed areas of construction is the single-family residence on State Route 29 (SR-29), east of the project site. The façade of this closest residence would be located approximately 635 feet from the acoustic center of construction activity where multiple pieces of heavy construction equipment would potentially operate at the project site. At this distance and assuming a direct line of sight, worst-case construction noise levels could range up to approximately 68 A-weighted decibel (dBA) maximum noise/sound level (L_{max}), intermittently, and could have an hourly average of up to 64 dBA equivalent sound level or equivalent continuous sound level (L_{eq}), at the façade of the nearest single-family residential home when multiple pieces of equipment operate simultaneously at the nearest center of construction activity. These noise levels would occur for only a short period, and noise levels would drop off at a rate of 6 decibels per doubling of distance as construction equipment moves across the site. Therefore, noise levels from construction activities would not exceed the City's construction noise standard of 75 dBA L_{eq} between the hours of 7:00 a.m. and 7:00 p.m. at the closest residential receptor. Additionally, an ambient noise monitoring effort was conducted to document the existing ambient noise environment in the project vicinity. The noise measurements data sheet is provided in Appendix B of this document. The measured daytime ambient noise level documented near the closest residential receptor was 64.4 dBA L_{eq} . Therefore, noise levels from construction activities also would not exceed the existing daytime ambient noise environment.

Furthermore, the proposed project must comply with Mitigation Measure NOI-1b of the 2018 Napa Airport Corporate Center Project EIR, which limits construction activities to the hours between 7:00 a.m. and 7:00 p.m., daily. Implementation of Mitigation Measure NOI-1b would further ensure that project construction activities would not result in a substantial temporary increase in ambient noise levels that would exceed the City's nighttime construction noise threshold of 60 dBA L_{eq} , and would ensure that project construction activities would not result in annoyance or sleep disturbance of nearby sensitive receptors. Mitigation Measure NOI-1a of the 2018 Napa Airport Corporate Center Project EIR would not be applicable to this project because the measure only applies to construction activities within Lot 1 and Lot 2 of the EIR document. The proposed project would not be constructed on Lot 1 or Lot 2. Therefore, compliance with Mitigation Measure NOI-1a would ensure that project construction noise impacts would be less than significant.

The proposed facility would house the existing construction and demolition debris recycling operation that occurs within the neighboring Devlin Road Transfer Station. Operation of the facility would result in no net increase in the facility's permitted throughput (1,440 tons of receipt and 600 truck trips per day). Therefore, there would be no net increase in project trips and no resulting increase in traffic noise levels. In addition, because the current outdoor operations would be relocated to within a partially enclosed facility, it would be expected that there would be no net increase in stationary noise, but rather an expected decrease in operational noise levels as measured at the nearest off-site receptors due to shielding provided

by the structure. The only new noise stationary noise source would be proposed mechanical ventilation fans that would be included in the new facility. Based on noise measurements conducted on other similar facilities by FCS, building air ventilation fans generate noise levels ranging up to approximately 80 dBA L_{eq} at the outlet of the fan. The proposed fans could be located on the façade of the proposed structure, as close as 600 feet from the nearest off-site residential receptor, located east of the project site. At this distance, and assuming a direct line of sight, the mechanical ventilation fan noise levels would attenuate to be below 37 dBA L_{eq} . These noise levels would not exceed the existing daytime ambient noise environment measured to be 64.4 dBA L_{eq} at the nearest residential receptor. In addition, these noise levels would not exceed the City's exterior noise level criterion of 65 dB L_{dn} . As such, the proposed project would result in less than significant operational noise impacts and would not alter any noise conclusions set forth in the Final EIR.

- b) The Final EIR evaluated the Napa Airport Corporate Center Project's construction and operational vibration. The EIR found that anticipated construction and operational activities would not result in groundborne vibration impacts at the single-family residence located east of the project near SR-29 in excess of the threshold for older residential structures set forth in the Vibration Guidance Manual. The Final EIR concluded that construction and operational vibration impacts would be a less than significant.

The proposed facility's construction and operational activities would occur more than 500 feet from the single-family residence located east of the project site near SR-29. This distance precludes the possibility of vibration impacts. As such, the proposed facility would not alter any vibration impact conclusions set forth in the Final EIR.

- c) The Final EIR found that a portion of the Napa Airport Corporate Center Project site is within the 55 dBA community noise equivalent level (CNEL), but outside of the 60 dBA CNEL noise contours of the Napa County Airport. Industrial and business park land use activities are compatible with this level of aviation noise and, therefore, the Final EIR concluded the impacts would be less than significant.

The proposed facility is located outside of the 55 dBA CNEL noise contour of the Napa County Airport. The Napa County Airport Land Use Compatibility Plan indicates that for service commercial, warehouse, and light industrial uses, aviation noise levels up to 60 dBA CNEL are considered "clearly compatible." Therefore, the proposed facility would not result in a conflict with the Napa County Airport's land use compatibility regulations and would not alter any noise conclusions set forth in the Final EIR.

Mitigation Measures

- MM NOI-1a** Concurrent with the initial grading or site preparation phase on either Lot 1 or Lot 2, the project applicant shall retain a qualified acoustical consultant to prepare and submit an acoustical study to the City of American Canyon for review and approval that identifies the appropriate sound barrier to protect the adjoining single-family

residential parcel. The study shall determine the requisite height, building materials and location of the sound barrier necessary to ensure that noise from operations on the project site does not result in an increase in noise levels for the adjoining single-family parcel greater than 3 dB CNEL. The conceptual location of the sound barrier is depicted in Exhibit 3.9 2 (Option 1) and Exhibit 3.9 3 (Option 2); however, these images do not limit the sound barrier to only these locations. The sound barrier shall employ landscaping or decorative features to soften the visual impact. **(Does not apply to project).**

MM NOI-1b

During construction activities, the following noise abatement measures shall be implemented:

- Construction activities involving the use of heavy equipment or loud tools shall be limited to the hours between 7:00 a.m. and 7:00 p.m., seven days a week. Construction activities that occur indoors or that do not involve the use of heavy equipment or loud tools may occur outside of these hours provided that they do not exceed 60 dB at the closest single-family residence. The City of American Canyon shall have the discretion to permit construction activities to occur outside of allowable hours if compelling circumstances warrant such an exception (e.g., weather conditions necessary to pour concrete).
- All construction equipment shall use noise-reduction features (e.g., mufflers and engine shrouds) that are no less effective than those originally installed by the manufacturer. If no noise reduction features were installed by the manufacturer, then the contractor shall require that at least a muffler be installed on the equipment.
- Construction staging and heavy equipment maintenance activities shall be performed a minimum distance of 100 feet from the single-family residence, unless safety or technical factors take precedence (e.g., a heavy equipment breakdown).

Conclusion

The conclusions from the Final EIR would remain unchanged with the approval of the facility.

Environmental Issue Area	Conclusion in EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
XIV. Population and Housing					
<i>Would the project:</i>					
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	No impact	No	No	No	None
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	No impact	No	No	No	None

Discussion

- a) The Final EIR noted that the Napa Airport Corporate Center Project would not develop residential uses and, therefore, not directly induce population growth. The Final EIR indicated that the project would employ up 287 workers and noted that the local labor force in Napa and Solano Counties was sufficiently large enough to fill this position without resulting in substantial indirect population growth. Lastly, the Final EIR noted that the project site is within an urbanized portion of the City of American Canyon and, thus, the development of the project would not remove a barrier to growth. The Final EIR concluded that no impacts would occur.

The proposed facility would be developed on Lot 4 and house the existing construction and demolition debris recycling operation that occurs at the neighboring Devlin Road Transfer Station. Because the facility would not increase the throughput of the operation, no substantial changes in employment are anticipated and, therefore, no indirect growth inducement would occur. As such, the proposed facility would not alter any population and housing conclusions set forth in the Final EIR.

- b) The Final EIR concluded that the Napa Airport Corporate Center Project was undeveloped and did not support any dwelling units. This condition precludes the possibility of displacement of housing. No impacts would occur.

The proposed facility would be developed on Lot 4, which is undeveloped. No dwelling units would be displaced. As such, the proposed facility would not alter any population and housing conclusions set forth in the Final EIR.

Mitigation Measures

None.

Conclusion

The conclusions from the Final EIR would remain unchanged with the approval of the facility.

Environmental Issue Area	Conclusion in EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
XV. Public Services					
<i>Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:</i>					
a) Fire protection?	Less than significant impact	No	No	No	None
b) Police protection?	Less than significant impact	No	No	No	None
c) Schools?	No impact	No	No	No	None
d) Parks?	No impact	No	No	No	None
e) Other public facilities?	No impact	No	No	No	None

Discussion

- a) The Final EIR indicated that the Napa Airport Corporate Center Project is located within 2.5 miles of the nearest fire station, which is sufficient to provide for acceptable response times. The Final EIR indicated that the project, and would provide two points of access for each lot and, thus, comply with Fire Code requirements. The Final EIR concluded that impacts would be less than significant.

The proposed facility would be located on Lot 4 of the Napa Airport Corporate Center Project and would provide two points of emergency access. As such, the proposed facility would not alter any public services conclusions set forth in the Final EIR.

- b) The Final EIR indicated that the Napa Airport Corporate Center Project would be expected to have minimal demand for police services with the exception of alarm calls. The Final EIR noted that the project would be required to submit a security plan as part of the City's standard conditions of approval.

The proposed facility would operate between 5:00 a.m. and 9:00 p.m. daily (except certain holidays). As such, staff would be on-site most of the time and would serve to deter and prevent crime. Moreover, due to the nature of the construction and demolition debris operation, it would be unlikely it would attract criminal activity that would require a substantial commitment of police resources. As such, the proposed facility would not alter any public services conclusions set forth in the Final EIR.

CEQA Checklist

- c) The Final EIR indicated that the Napa Airport Corporate Center Project would not develop residential uses and, therefore, would not increase enrollment in K-12 schools. The Final EIR concluded that no impacts would occur.

The proposed facility would be non-residential in nature and therefore, would not increase enrollment in K-12 schools. As such, the proposed facility would not alter any public services conclusions set forth in the Final EIR.

- d) The Final EIR indicated that the Napa Airport Corporate Center Project would not develop residential uses and, therefore, would not increase demand for parks. The Final EIR concluded that no impacts would occur.

The proposed facility would be non-residential in nature and therefore, would not increase demand for parks. As such, the proposed facility would not alter any public services conclusions set forth in the Final EIR.

- e) The Final EIR indicated that the Napa Airport Corporate Center Project would not develop residential uses and, therefore, would not increase demand for libraries or other public facilities. The Final EIR concluded that no impacts would occur.

The proposed facility would be non-residential in nature and therefore, would not increase demand for libraries or other public facilities. As such, the proposed facility would not alter any public services conclusions set forth in the Final EIR.

Mitigation Measures

None.

Conclusion

The conclusions from the Final EIR would remain unchanged with the approval of the facility.

Environmental Issue Area	Conclusion in EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
XV. Recreation					
<i>Would the project:</i>					
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	No impact	No	No	No	None
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	No impact	No	No	No	None

Discussion

a–b) The Final EIR indicated that the Napa Airport Corporate Center Project would not develop residential uses and, therefore, would not increase demand for recreational facilities. The Final EIR concluded that no impacts would occur.

The proposed facility would be non-residential in nature and therefore, would not increase demand for recreational facilities. As such, the proposed facility would not alter any recreation conclusions set forth in the Final EIR.

Mitigation Measures

None.

Conclusion

The conclusions from the Final EIR would remain unchanged with the approval of the facility.

Environmental Issue Area	Conclusion in EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
XVI. Transportation					
<i>Would the project:</i>					
a) Conflict with a program plan, ordinance or policy of the circulation system, including transit, roadway, bicycle and pedestrian facilities?	Significant unavoidable impact	No	No	No	Mitigation Measures TRANS-1a, TRANS-1b, TRANS-1c, TRANS-1d, TRANS-2, TRANS-8, and TRANS-9
b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	N/A	No	No	No	None
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Less than significant impact after mitigation	No	No	No	Mitigation Measure TRANS-6
d) Result in inadequate emergency access?	Less than significant impact	No	No	No	None

Discussion

- a) The Final EIR evaluated Napa Airport Corporate Center Project-related impacts on traffic under Existing Plus Project, Existing Plus Background Development Plus Project, and Cumulative Conditions. The analysis found that the project would contribute new trips to up to 19 intersections that would operate at unacceptable levels during one or more peak-hours evaluated. The Final EIR set forth Mitigation Measures TRANS-1a, TRANS-1b, TRANS-1c, TRANS-1d, TRANS-1f, TRANS-2, TRANS-8, and TRANS-9 which require implementation of a transportation demand management program and improvements at impacted facilities; however, not all facilities would be restored to acceptable levels because of the lack of feasible or effective mitigation. Additionally, the Final EIR disclosed that project-related construction activities may result in temporary road or lane closures and, thus, required the applicant to

implement a Construction Management Plan. The Final EIR concluded that impacts would be significant and unavoidable.

The proposed facility would house the existing construction and demolition debris recycling operation that occurs within the neighboring Devlin Road Transfer Station. The facility would result in no net increase in the facility's permitted throughput (1,440 tons of receipt and 600 truck trips per day) and, thus, there would be no net increase in trip generation. Because Lot 4 represented approximately 44 percent of the Napa Airport Corporate Center's square footage (as evaluated under Option 1 of the Final EIR), the proposed project would substantially reduce the trip generation potential and corresponding impacts disclosed in the Final EIR. Therefore, Mitigation Measures TRANS-1a, TRANS-1b, TRANS-1c, TRANS-1d, TRANS-2, and TRANS-8 would not apply; however, the project would implement Mitigation Measure TRANS-9. As such, the proposed facility would not alter any transportation conclusions set forth in the Final EIR.

- b) The Final EIR did not evaluate vehicle miles traveled because it was not required at time the document was prepared.

The proposed facility would house the existing construction and demolition debris recycling operation that occurs within the neighboring Devlin Road Transfer Station. The facility would result in no net increase in the facility's permitted throughput (1,440 tons of receipt and 600 truck trips per day) and, thus, there would be no net increase in trip generation or vehicle miles traveled. As such, the proposed facility would not alter any transportation conclusions set forth in the Final EIR.

- c) The Final EIR found that Lots 1 and 2 of the Napa Airport Corporate Center Project had less than optimal driveway locations and internal circulation. The Final EIR set forth Mitigation Measure TRANS-6 that required revisions to the site plan to correct these issues to reduce impacts less than significant. Additionally, the Final EIR evaluated pedestrian mobility and set forth Mitigation Measure TRANS-8 requiring pedestrian facilities within each lot to reduce impacts less than significant.

The proposed facility would be developed on Lot 4 and, thus, Mitigation Measure TRANS-6 does not apply. As shown in Exhibit 5, the proposed facility provides pedestrian connection between Devlin Road and the proposed structure. As such, the proposed facility would not alter any transportation conclusions set forth in the Final EIR.

- d) The Final EIR indicated that all of lots within the Napa Airport Corporate Center Project would be served by two points of access and, thus, compliant with the California Fire Code. The EIR also noted that Devlin Road is planned to be extended to Green Island Road, which would provide an additional emergency response route for project end users. The Final EIR concluded that impacts would be less than significant.

The proposed facility would take access from an internal connection with the Devlin Road Transfer Station and a driveway connection with Devlin Road. Haul trips would all occur through the existing Devlin Road Transfer Station access point; the Devlin Road driveway would

be limited to operations and safety. As such, two points of access would be provided. As such, the proposed facility would not alter any transportation conclusions set forth in the Final EIR.

Mitigation Measures

MM TRANS-1a The project applicant will be responsible for paying the City's Traffic Impact Fee for the proposed development. The funds collected under this program would be used to make improvements to a number of intersections throughout American Canyon, improvements to which would lessen the significant cumulative transportation impacts. However, because these projects for which the Applicant would make a fair share contribution pursuant to this mitigation measure rely upon discretionary funding and approval by a third party (Caltrans), the impact would remain significant and unavoidable. **(Does not apply to project).**

MM TRANS-1b Prior to issuance of the first construction permit for each building in the proposed project, the project applicant shall pay a fair share contribution towards the estimated construction costs for the following identified regional project on the state highway system. The fair share shall be calculated at the time payment is required, based on the projected traffic of the proposed use of the building, and the estimated cost of the construction at that time. Fair share shall be calculated by following the "Method for Calculating Equitable Mitigation Measures" from Caltrans Guide to the Preparation of Transportation Impact Studies (2002)":

- The SR-12–29/SR221-Soscol Ferry Road Flyover Ramp, currently estimated at \$40 million according to Caltrans's SR-29/221 Soscol Junction Improvement Project Draft Environmental Impact Report/Environmental Assessment (dated March 2015).
- Because this project for which the Applicant would make a fair share contribution pursuant to this mitigation measure relies upon discretionary funding and approval by a third party (Caltrans), the impact would remain significant and unavoidable. The aforementioned parties (Caltrans, NCTPA, and the City of American Canyon, at minimum) will be required to develop formal agreements regarding the funding sources for these projects and the mechanism for collecting and transferring the funds for this mitigation measure to be feasible. **(Does not apply to project).**

MM TRANS-1c Prior to issuance of the first construction permit for each building in the proposed project, the project applicant shall pay a fair share contribution of the estimated construction costs for the following identified regional project on the state highway system. The fair share shall be calculated at the time payment is required, based on the projected traffic of the proposed use of the building, and the estimated cost of the construction at that time. Fair share shall be calculated by following the "Method for Calculating Equitable Mitigation Measures" from Caltrans Guide to the Preparation of Transportation Impact Studies (2002)":

- The grade-separated Airport Boulevard/SR-12–29 Interchange Project, planned by Caltrans, is currently estimated at \$73 million according to the NCTPA SR-29 Gateway Corridor Improvement Plan (dated February 2014).
- Because this project for which the Applicant would make a fair share contribution pursuant to this mitigation measure relies upon discretionary funding and approval by a third party (Caltrans), the impact would remain significant and unavoidable. The aforementioned parties (Caltrans, NCTPA, and the City of American Canyon, at minimum) will be required to develop formal agreements regarding the funding sources for these projects and the mechanism for collecting and transferring the funds for this mitigation measure to be feasible. **(Does not apply to project).**

MM TRANS-1d Prior to issuance of the first certificate of occupancy for the proposed project, the Applicant shall construct the following improvements along South Kelly Road, or, at the sole discretion of the City, enter into an off-site improvement agreement and prove an acceptable financial guarantee ensuring that these improvements will be completed:

- (1) At the intersection of SR-29 at South Kelly Road:
 - Northbound approach: three through lanes, two left-turn lanes, one right-turn lane
 - Southbound approach: three through lanes, one left-turn lane, one right-turn lane
 - Eastbound approach: one through lane, two left-turn lanes, one right-turn lane
 - Westbound approach: one through lane, two left-turn lanes, one right-turn lane
- (2) At the intersection of South Kelly Road and Devlin Road:
 - Northbound approach: one through lane, one right-turn lane
 - Southbound approach: one through lane, one left-turn lane
 - Private driveway: None
 - Westbound approach: one left-turn lane, one right-turn lane
- (3) South Kelly Road, between Devlin Road and SR-29 intersections:
 - Two westbound receiving lanes, one eastbound lane, and one two-way left turn lane.

The length of the turn lanes on SR-29 shall be in accordance with the Caltrans Highway Design Manual requirements for a 55-mph highway, and shall accommodate sufficient vehicle storage length for STAA vehicles under Existing Plus Background Plus Project conditions such that the intersection operates at least LOS D.

The length of the turn lanes on South Kelly Road shall accommodate sufficient vehicle storage length under Existing Plus Background Plus Project conditions such that the intersection operates at least LOS D.

The Applicant shall fund 100 percent of the cost of these improvements. To the extent these improvements represent oversizing that is over and above what would be necessary to mitigate the impacts of the project, the Applicant shall be eligible

for reimbursement for costs above its fair share from other nearby private development on Assessor's Parcel Numbers 057-090-083 and 84 that will also contribute traffic to this intersection. Prior to incurring any expenses for which they may be eligible for reimbursement, the Applicant shall enter into a reimbursement agreement with the City.

This mitigation measure is the same as one that was required of Napa Logistics Park Phase 2 on Assessor's Parcel Number 057-090-083. In the event that, at the time of issuance of the first building permit within the Napa Airport Corporate Center project, construction of the improvements described in this mitigation measure has commenced, or the developer of Napa Logistics Park Phase 2 has entered into an agreement with the City of American Canyon to fund and construct these improvements, then the Applicant for Napa Airport Corporate Center project shall not be responsible to fund and construct the improvements but shall be subject to obligations for fair share reimbursement for the improvements.

The implementation of this mitigation measure would be done in conjunction with construction that has already been planned and approved. The additional construction activity may incrementally increase construction traffic, noise, and air emissions in the activity area, but would not change the analysis, conclusions, or mitigation measures in this EIR. Construction activity associated with this mitigation measure would be required to comply with all applicable local and state laws and regulations such as dust suppression, limitations on hours of construction, stormwater runoff controls, and other similar requirements designed to reduce or avoid environmental impacts.

Because the South Kelly Road intersection at SR-29 is impacted in the PM peak hour as a result of downstream queues, the impact at this intersection would remain significant and unavoidable with the implementation of this mitigation measure without changes to SR-29 through the City of American Canyon (between Napa Junction Road and American Canyon Road).

As a result of the implementation of this mitigation measure, the significant impacts at the South Kelly Road intersection with Devlin Road are reduced to a less than significant level. **(Does not apply to project).**

MM TRANS-1f To mitigate this significant impact of greater trip generation from more intense land uses on the project site, the Applicant shall establish a Transportation Demand Management (TDM) program. The intent of the TDM program is to ensure that traffic volumes generated by Project do not exceed that which would occur from warehouse-only uses. Notwithstanding its intent, the applicant shall implement this mitigation measure regardless of the mix of uses that is eventually built. The TDM Agreement shall establish a peak hour trip budget based on the Institute of Transportation Engineers' "Trip Generation, 8th Edition" Land Use Code 150 (Warehouse).

The Applicant shall enter into a TDM Agreement prior to the issuance of the first building permit. The TDM Agreement shall require that an effective TDM program be implemented prior to the first certificate of occupancy and be subjected to on-going periodic monitoring thereafter. The TDM Agreement shall also include a financial guarantee satisfactory to the City.

The TDM program shall be implemented at the applicant's cost, with no cost to the City, regardless of the eventual mix of uses and shall at a minimum include a permanent vehicle counting station at the single public access point. Examples of measures that may be considered as part of an effective TDM program include but are not limited to the following:

- Starting and ending workday shifts during off-peak hours (i.e., not between 7:00 a.m. to 9:00 a.m. or 3:00 p.m. to 6:00 p.m.).
- Implement shuttle service to key employment centers or park-and-ride lots in the area for those employees whose workday shift start during peak hours.
- Car-share program
- Shuttles to regional transit
- Transit subsidies
- Carpool/vanpool subsidies
- Employer-owned/sponsored vanpools
- Flex-time and telecommute programs
- Use of rail for Lot H

The Applicant shall retain a transportation planning/engineering consultant to analyze the effectiveness of the TDM program in a written report. The TDM Report will include data collected from the permanent vehicle counting station and a determination of employee commute methods, which shall be informed by surveying all employees working at the site. The TDM Report shall be submitted to the City on a periodic on-going basis and it shall form the basis of on-going determinations by the City as to the effectiveness of the TDM program. **(Does not apply to project).**

MM TRANS-2 Prior to issuance of the first certificate of occupancy for the proposed project or when monitoring determines that it is warranted, the project applicant shall construct or pay its fair share to construct improvements at the intersection of South Kelly Road/Devlin Road (#18). The improvements shall consist of the installation of a signal and a westbound left-turn pocket on South Kelly Road. This mitigation measure is required mitigation for another development application (Napa Logistics Park Phase 2). The applicant shall fund 100 percent of the cost of this improvement. To the extent these improvements represents oversizing that is over and above what would be necessary to mitigate the impacts of the project, the applicant shall be eligible for reimbursement for costs above its fair share from other nearby private developments that will also contribute traffic to this intersection. Prior to incurring any expenses for they may be eligible for reimbursement, the applicant shall enter

into a reimbursement agreement with the City. The roadway change to westbound South Kelly Road is currently proposed as part of Mitigation Measure TRANS-1d.
(Does not apply to project).

MM TRANS-6 Prior to issuance of building permits for each building, the project applicant shall prepare and submit a site plan to the City of American Canyon for review and approval that either re-configures the Building B driveway to be made right-in, right-out, or it should be eliminated, and the driveway for Building A should be made the lone access point for these two areas. The parking in this area should be re-organized to create a better circulation plan for Building A and B. The approved plans shall be incorporated into the improvement plans for the project. **(Does not apply to project).**

MM TRANS-8 Prior to issuance of building permits for each building, the project applicant shall prepare and submit a site plan to the City of American Canyon for review and approval that depicts pedestrian facilities and crosswalks that facilitate safe, accessible pedestrian travel between the internal roadways and the building entrances. Pedestrian facilities may include public sidewalks or multi-use trails or private internal sidewalks or pathways. The site plan shall also depict the bike racks or lockers at strategic locations to serve the project buildings. The approved plans shall be incorporated into the improvement plans for the project. **(Does not apply to project).**

MM TRANS-9 ~~NVWMA shall retain a qualified consultant to prepare~~ ~~The project applicant shall develop and submit~~ a Construction Management Plan (CMP) to the City of American Canyon prior to commencement of any construction activities, including construction activities associated with the transportation mitigation measures. The provisions of a CMP shall specifically address the characteristics of construction-related traffic associated with development. Such plans identify construction phasing and the level and type of construction-related traffic. The CMP shall identify construction truck routes to access the project site, lane closures on existing public streets (if needed) including a plan for any necessary traffic control measures, and on-site staging requirements, ~~and other information as required by the City.~~

~~Once the construction truck routes have been approved, but before construction has started, the applicant shall conduct a survey of existing conditions of pavement along the approved truck routes and submit documentation of the results to the City. When construction has been substantially completed such that there will be no further construction truck trips, the applicant shall re-survey the construction truck routes. The project applicant NVWMA shall be responsible for repairing damage to roadways used for construction vehicle access to the site and attributable to the project so that the roadway conditions are returned to their pre-construction conditions (or better) as documented in the pre-construction survey along the truck routes following the construction of the project.~~

Conclusion

The conclusions from the Final EIR would remain unchanged with the approval of the facility.

Environmental Issue Area	Conclusion in EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
XVIII. Utilities and Service Systems					
<i>Would the project:</i>					
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	Less than significant impact	No	No	No	None
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	Less than significant impact	No	No	No	None
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	Less than significant impact	No	No	No	None
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	Less than significant impact	No	No	No	None

Environmental Issue Area	Conclusion in EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
e) Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?	Less than significant impact	No	No	No	None

Discussion

- a) The Final EIR indicated that the Napa Airport Corporate Center Project would be served by utilities that currently exist within Devlin Road and, thus, only service laterals would need to be extended to each lot. As such, the Final EIR found that the project would not result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, and impacts would be less than significant.

The proposed facility would be served by service laterals that would connect to water, wastewater, electric power, natural gas, and telecommunications facilities within Devlin Road. No new or expanded facilities would be required. As such, the proposed facility would not alter any utility conclusions set forth in the Final EIR.

- b) The Final EIR concluded that the Napa Airport Corporate Center Project would demand approximately 6 million gallons of potable water annually. A Water Supply Assessment was prepared that found that adequate water supply could be provided by the City of American Canyon under wall water year scenarios. The Final EIR concluded that impacts would be less than significant.

The proposed facility would primarily use water for landscape irrigation. Depending on the availability of infrastructure, all of the irrigation demand may be provided by recycled water or non-potable well water. The existing water use associated with the construction and demolition debris recycling operation would be relocated to the project site and, thus, not net increase would occur from this aspect of the project. In total, the proposed facility would have little to no net increase in demand for potable water. As such, the proposed facility would not alter any utility conclusions set forth in the Final EIR.

- c) The Final EIR indicated that the Napa Airport Corporate Center Project would generate an average of 4,770 gallons per day and a maximum of 9,540 gallons per day. The Final EIR found that the City of American Canyon's Water Recycling Plant treat capacity was planned to be increased to 4 million gallons per day and, thus, the proposed project's sewage would

represent less than 1 percent of capacity. The Final EIR concluded that impacts would be less than significant.

The proposed facility may include employee bathrooms. Because the proposed facility would not result in a substantial increase in employees, there would be expected to be little no net increase in effluent generation. As such, the proposed facility would not alter any utility conclusions set forth in the Final EIR.

- d–e) The Final EIR indicated that the Napa Airport Corporate Center Project would generate 1,557 cubic yards of construction debris (one time) and 1,921 cubic yards of operation waste (annually). The Final EIR noted that four regional landfills had a combined 153 million cubic yards of remaining capacity and concluded that adequate landfill capacity was available. The Final EIR found that impacts would be less than significant.

The proposed facility would be used for construction and demolition debris recycling. Waste from the construction of the facility would be processed at the existing operation within the Devlin Road Transfer Station. Once operational, the facility would not be expected to increase operational waste generation as there would be no increase in throughput or a substantial increase in employment. As such, the proposed facility would not alter any utility conclusions set forth in the Final EIR.

Mitigation Measures

None.

Conclusion

The conclusions from the Final EIR would remain unchanged with the approval of the facility.

Environmental Issue Area	Conclusion in EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
XIX. Wildfire					
<i>If located in or near State Responsibility Areas or lands classified as very high fire hazard severity zones, would the project:</i>					
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	Less than significant impact	No	No	No	None
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	No impact	No	No	No	None
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	No impact	No	No	No	None
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	No impact	No	No	No	None

Discussion

- a) The Final EIR indicated that all of lots within the Napa Airport Corporate Center Project would be served by two points of access and, thus, compliant with the California Fire Code. The EIR also noted that Devlin Road is planned to be extended to Green Island Road, which would provide an additional emergency response and evacuation route for project end users. The Final EIR concluded that impacts would be less than significant.

The proposed facility would take access from an internal connection with the Devlin Road Transfer Station and a driveway connection with Devlin Road. Haul trips would all occur through the existing Devlin Road Transfer Station access point; the Devlin Road driveway would be limited to operations and safety. As such, two points of access would be provided. As such, the proposed facility would not alter any wildfire conclusions set forth in the Final EIR.

- b–d) The Final EIR concluded that the Napa Airport Corporate Center Project is surrounded by urban development on three sides and undeveloped land on the fourth and is not susceptible to wildland fires. No impact would occur.

The facility would be developed on Lot 4 of the Napa Airport Corporate Center Project and, thus, have no susceptibility to wildland fires. As such, the proposed facility would not alter any wildfire conclusions set forth in the Final EIR.

Mitigation Measures

None.

Conclusion

The conclusions from the Final EIR would remain unchanged with the approval of the facility.

Environmental Issue Area	Conclusion in EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
XX. Mandatory Findings of Significance					
<i>Would the project:</i>					
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	Less than significant impact after mitigation	No	No	No	Mitigation Measures BIO-1a, BIO-1b, BIO-1c, BIO-1d, BIO-2a, BIO-2b, CUL-1, CUL-3, and CUL-4
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	Less than significant impact	No	No	No	None

Environmental Issue Area	Conclusion in EIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	Less than significant impact	No	No	No	None

Discussion

- a) The Final EIR indicated that the Napa Airport Corporate Center Project would have a less than significant impact on listed species, migratory species, or riparian habitat. The project would incorporate Mitigation Measures BIO-1a, BIO-1b, BIO-2a, BIO-2b, BIO-2c, BIO-4a, BIO-4b, BIO-5a, and BIO-5b, which ensure that precautions are taken prior to construction to ensure that protected bird species would not be disturbed. The Final EIR indicated that construction activities may encounter undiscovered cultural resources, and, therefore, Mitigation Measures CUL-1, CUL-3, and CUL-4 would be implemented to reduce impacts to a level of less than significant. The Final EIR concluded impacts would be less than significant.

The proposed facility would result in soil disturbance. Any such work would be subject to Mitigation Measures BIO-1a, BIO-1b, BIO-1c, BIO-1d, BIO-2a, and BIO-2b, CUL-1, CUL-3, and CUL-4, as appropriate. As such, the proposed facility would not alter any conclusions set forth in the Final EIR.

- b) The Final EIR indicated that many of the Napa Airport Corporate Center Project’s impacts would occur during construction, with a few lasting operational effects. With regard to remaining areas of analysis, cumulatively, the Napa Airport Corporate Center Project would not result in significant long-term impacts that would substantially combine with impacts of other current or probable future impacts. The Napa Airport Corporate Center Project would not create impacts that are cumulatively considerable. The Final EIR concluded impacts would be less than significant.

As discussed above, the proposed facility would not result in any new or more severe cumulative impacts. As such, the proposed facility would not alter any conclusions set forth in the Final EIR.

- c) The preceding sections of this Initial Study/Addendum discuss various types of impacts that could have adverse effects on human beings, including:
- Dust and air pollutants during project construction activities (Section 3, Air Quality)
 - Operational emissions (Section 3, Air Quality)

Each type of impact with the potential to cause substantial adverse effects on human beings has been evaluated, and this Initial Study/Addendum concludes that these potential impacts would not substantially increase with development of the project, and would be consistent with the results concluded in the Final EIR.

Mitigation Measures

Implement Mitigation Measures BIO-1a, BIO-1b, BIO-1c, BIO-1d, BIO-2a, BIO-2b, CUL-1, CUL-3, and CUL-4.

Conclusion

The conclusions from the Final EIR would remain unchanged with the approval of the facility.

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