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Initial Study/Mitigated Negative  
Declaration & MMRP

**COUNTY OF NAPA**  
**PLANNING, BUILDING AND ENVIRONMENTAL SERVICES DEPARTMENT**  
1195 THIRD ST., SUITE 210  
NAPA, CA 94559  
(707) 253-4416

**Initial Study Checklist**  
(form updated October 2016)

1. **Project Title:** Sheehy Speculative Light Industrial Building, Use Permit P17-00274
2. **Property Owner/Project Sponsor Name and Address:** Rudd Properties, LLC (John Dobrovich); 2416 E. 37th Street N., Wichita, KS 67219
3. **Representative Name and Address:** Josh Paradis, Ware Malcomb; 4683 Chabot Drive, Suite 300, Pleasanton, CA 94588
4. **County Contact Person, Phone Number, and Email:** Sean Trippi; (707) 299-1353; sean.trippi@countyofnapa.org
5. **Project Location and APN:** The project is proposed on a 2.74 acre site on the east side of Devlin Road, adjoining Sheehy Creek. APN's: 057-210-037 & 038 (SFAP). Napa.
6. **General Plan Description:** Industrial
7. **Zoning:** Industrial Park: Airport Compatibility (IP:AC)

8. **Description of Project:**

The project consists of a request to construct a new light industrial building with approximately 40,085 square feet of floor area which includes approximately 38,020 sq. ft. of warehouse space and 2,065 sq. ft. of office space. No tenants have been identified. Primary access would be provided from a new driveway on Devlin Road. Access would also be provided through the site to south via a shared internal drive aisle. A shared easement agreement between the two properties is already in place. On-site parking for 58 vehicles and landscaping are also included with the proposal. The request also includes a variation to the development regulations of the Napa Valley Business Park Specific Plan eliminating the required 10-foot landscape area along the south property line to accommodate the proposed shared drive aisle and reducing the required 10-foot landscape area along the east property line to a minimum of 5'-0" up to 7'-1". The project will connect to municipal water and sewer services provided by the City of American Canyon and the Napa Sanitation District, respectively.

Exterior building materials include tex-coat concrete tilt-up wall panels with a multi-color paint scheme and multiple score lines/reveals. The west elevation (facing Devlin Road) includes a glass storefront entry with a low-sloping roof utilizing a heavy timber structure and a concrete tile roof that extends along the majority of the building wall. The west elevation also includes decorative metal panels above the main entry and a portion of the sloped roof. All four elevations include clerestory windows. The north, south, and east elevations include a low-sloping roof utilizing a heavy timber structure with concrete tile roofing above several of the clerestory windows. The north elevation includes two depressed loading docks and two eight man-doors. The south and east elevations include two at-grade overhead roll-up doors and 2-3 man-doors. The north and south elevations each have four man-doors. Days and hours of operation have not been specified. The proposed facility expects to employ up to 43 people.

9. **Describe the environmental setting and surrounding land uses:**

The site is currently vacant, has been previously graded and is located within a partially developed industrial/business park. The site has been designated for industrial development for over 30 years. A portion of the northern boundary of the site adjoins Sheehy Creek. The development area is relatively flat with gentle slopes ranging from 0-5 percent from east to west and includes ruderal grasses, an 8-10 foot high soil (fill) pile, two clumps of coyote bush shrub, and a planted riparian area along Sheehy Creek. There is an existing walking path along the south side of Sheehy Creek that was constructed as part of the creek restoration project that includes the planted riparian corridor. Adjoining the south side of the project site is an office complex with four multi-tenant buildings. To the north across Sheehy Creek is an approved, but not yet constructed, self-storage facility. Adjoining the east side of the project site are two undeveloped properties totaling approximately 5.6 acres. To the southeast of the project site is Portocork facility, currently under construction. East of Portocork is a 4.4 acre site with a pending application for a proposed 71,246 sq. ft. speculative light industrial building. North of the 4.4 acre site is a 4.33 acre site adjoining the Sheehy Creek and State Highway 29 with an approved, but not yet constructed, 67,930 sq. ft. three story office building. Across Devlin Road to the west is an office/light industrial complex with three multi-tenant building, and across Delvin Road to the northwest are an approved winery with an annual production capacity of 120,000 gallons with approximately 34,510 sq. ft. of floor area and an approved 27,677 sq. ft. speculative light industrial building on the northwest and southwest corners of Devlin Road and Sheehy Court, respectively. The project site is in close proximity to the Napa County Airport, and is located in Zone D, the Common Traffic Pattern. This is an area of frequent aircraft overflight at low elevations.

10. **Other agencies whose approval is required** (e.g., permits, financing approval, or participation agreement). Discretionary approval required by Napa County consists of a use permit. The proposed project would also require various ministerial approvals by the County including, but not limited to building permits, grading permits, encroachment permits, and a lot line adjustment or parcel merger. Permits to connect to water and sewer utilities are required from the City of American Canyon and Napa Sanitation District, respectively. A Storm Water Pollution Prevention Plan (SWPPP) is required to meet San Francisco Regional Water Quality Control Board standards and is administered by the Engineering Services Division.

The proposed project does not involve modifications to a streambed, and thus does not require a streambed alteration agreement from the California Department of Fish and Wildlife. The proposed project does not involve the fill of waters of the United States, and thus does not require a dredge-and-fill permit from the U.S. Army Corps of Engineers. The proposed project does not involve the "take" of listed endangered or threatened species, and thus does not require a "take permit" from the Department of Fish and Wildlife, the U.S. Fish and Wildlife Service, or the National Marine Fisheries Service.

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

City of American Canyon  
Napa Sanitation District

**Other Agencies Contacted**

City of Napa

11. **Tribal Cultural Resources. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?**

Pursuant to Public Resources Code section 21080.3.1, invitation for tribal consultation was completed. One response was received from the Middletown Rancheria dated September 12, 2017. The letter indicates that while the Middletown Rancheria has no comments, they would like to be notified should any resources be found.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

**ENVIRONMENTAL IMPACTS AND BASIS OF CONCLUSIONS:**

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

On the basis of this initial evaluation:

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



Sean Trippi, Principal Planner  
County of Napa Planning, Building and Environmental Services Department



Date

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
I. <b>AESTHETICS.</b> Would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion:

- a/b. The proposed project would not be located within an area which would damage any known scenic vista, or damage scenic resources, trees, rock outcroppings, or historic buildings. The proposed project site has been previously graded and consists primarily of ruderal grasses, a soil pile, two areas of coyote bush, and is currently vacant.
- c. The proposed project is located within a partially developed portion of the Napa Valley Business Park Specific Plan (NVBPSP) area that allows a mix of industrial developments. The building is located on the east side of Devlin Road, south of Sheehy Creek. The building includes tex-coat concrete tilt-up wall panels with a multi-color paint scheme and multiple score lines/reveals. The west elevation (facing Devlin Road) includes a glass storefront entry with a low-sloping roof utilizing a heavy timber structure and a concrete tile roof that extends along the majority of the building wall. The west elevation also includes decorative metal panels above the main entry and a portion of the sloped roof. All four elevations include clerestory windows. The north, south, and east elevations include a low-sloping roof utilizing a heavy timber structure with concrete tile roofing above several of the clerestory windows. The overall design is equivalent to other similar more recent industrial projects approved and/or constructed within the NVBPSP boundaries, and meets the minimum design requirements for the NVBPSP industrial park area. Therefore, the project will not substantially degrade the existing visual character or quality of the site and surrounding area.
- d. The new facility will result in a minor increase in the nighttime lighting. In accordance with County standards, all exterior lighting will be the minimum necessary for operational and security needs. Light fixtures will be kept as low to the ground as possible and include shields to deflect the light downward. Avoidance of highly reflective surfaces will be required, as well as standard County conditions to prevent light from being cast skyward. This is an area routinely overflowed by low flying aircraft which necessitates strong controls on skyward nighttime lighting. As designed, and as subject to standard conditions of approval, the project will not create a significant impact from light or glare. As designed, and as subject to the standard condition of approval, below, the project will not have a significant impact resulting from new sources of outside lighting.

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

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

6.3 *LIGHTING – PLAN SUBMITTAL*

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

**Mitigation Measures:** None required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>II. AGRICULTURE AND FOREST RESOURCES.<sup>1</sup> Would the project:</b>				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Important (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land as defined in Public Resources Code Section 12220(g), timberland as defined in Public Resources Code Section 4526, or timberland zoned Timberland Production as defined in Government Code Section 51104(g)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use in a manner that will significantly affect timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, or other public benefits?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Discussion:**

- a/b. The project site is located within a developing industrial park. The project would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Important as shown on the Napa County GIS map (*Department of Conservation Farmlands 2012 Napa County Farmlands* layer). According to Napa County GIS the property is categorized as Farmland of Local Importance (L). Although the site, as well as other undeveloped land in the NVBPSP area, is classified as being locally important, the site has been designated for industrial or business park uses for the last 30 years. Undeveloped lands within the boundary of the NVBPSP are designated as Farmland of Local Importance because they include areas of soils that meet all the characteristics of Prime Farmland or of additional Farmland of Statewide Importance with the exception of irrigation. As development in the NVBPSP area continues, the surrounding developed parcels have been reclassified as Urban and Built-up Land (D). The project site is not subject to a Williamson Act contract.
- c/d. The project site is zoned Industrial Park (IP), which allows light industrial, manufacturing, office and business park uses upon grant of a use permit, and is located within the Napa Valley Business Park Specific Plan. According to the Napa County Environmental Resource Maps (based on the following layers – Sensitive Biotic Oak woodlands, Riparian Woodland forest, and Coniferous forest) the project site does not contain woodland or forested areas. Therefore, the proposed project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production.
- e. The project site is surrounded by developing industrial park land. Although farming activities occurred on these lands in the past, the area has been designated for industrial development for over 30 years. The project will not result in the conversion of existing farmland.

**Mitigation Measures:** None required.

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

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
III. <b>AIR QUALITY.</b> Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion:

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

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

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

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

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

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

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

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

As mentioned above, in 2010, the BAAQMD adopted and later incorporated into its 2011 CEQA Guidelines project screening criteria (Table 3-1 – Operational-Related Criteria Air Pollutant and Precursors Screening Level Sizes) and thresholds of significance for air pollutants, which have now been updated by BAAQMD through May 2017. The proposed facility includes approximately 40,085 square feet of floor area including approximately 2,065 square feet of office area. When compared to the BAAQMD's operational criteria pollutant screening size of 541,00 square feet and 864,000 square feet for light industrial and warehousing, respectively, the project would not significantly impact air quality and does not require further study (BAAQMD CEQA Guidelines, May 2017 Pages 3-2 & 3-3.). Given the size of the project compared to the BAAQMD's screening criterion of 864,000 square feet (warehousing) and 346,000 square feet (general office) for NOx (oxides of nitrogen), the project would contribute an insignificant amount of air pollution and would not result in a conflict or obstruction of an air quality plan.

The project falls well below the screening criteria as noted above, and consequently will not significantly affect air quality individually or contribute considerably to any cumulative air quality impacts.

- d. In the short term, potential air quality impacts are most likely to result from earthmoving and construction activities required for project construction. Earthmoving and construction emissions would have a temporary effect; consisting mainly of dust generated during grading and other construction activities, exhaust emissions from construction related equipment and vehicles, and relatively minor emissions from paints and other architectural coatings. The proposed grading plan has been designed to balance cut and fill resulting no off or on-haul of soils. If grading were to result in off or on-haul of soils, these potential construction impacts would be temporary in nature and subject to standard conditions of approval from the Engineering Division as part of the grading permit or building permit review process.

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

#### 7.1 SITE IMPROVEMENT

##### c. AIR QUALITY

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

1. *Post a publicly visible sign with the telephone number and person to contact at the lead agency regarding dust complaints. The BAAQMD's phone number shall also be visible.*
2. *Water all exposed surfaces (e.g., parking areas, staging areas, soil piles, grading areas, and unpaved access roads) two times per day.*
3. *Cover all haul trucks transporting soil, sand, or other loose material off-site.*
4. *Remove all visible mud or dirt tracked onto adjacent public roads by using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.*
5. *All vehicle speeds on unpaved roads shall be limited to 15 mph.*

6. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
7. Idling times shall be minimized either by shutting off equipment when not in use or reducing the maximum idling time to five (5) minutes (as required State Regulations). Clear signage shall be provided for construction workers at all access points.

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

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

7.1. SITE IMPROVEMENT

b. DUST CONTROL

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

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

**Mitigation Measures:** None required.

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
IV.	<b>BIOLOGICAL RESOURCES.</b> Would the project:				
	a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, Coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



Discussion:

- a-c. The site is part of the Gateway Business Park Industrial Subdivision approved for industrial development in 1989. Improvements adjoining the site along Devlin Road, such as curb, gutter, sidewalk, sewer and water laterals, street lights, etc., were installed in the mid-1990's as part of the approved subdivision improvements. A previous survey of plant species, entitled Botanical Survey of Napa Valley Gateway, prepared by Jake Ruygt, dated August 25, 1988, was conducted in the airport industrial park area associated with the proposed subdivision and included the project site. The survey did not find any rare, threatened, or endangered species on the project site. In addition, Sheehy Creek was realigned and enhanced to mitigate potential impacts to biological resources resulting from future development on the lots within the subdivision. Conservation easements with a width of 35-feet were recorded along both sides of Sheehy Creek. Prior to commencing construction of the required improvements and creek enhancement, the Gateway Business Park developer was required to obtain all necessary permits from California Department of Fish & Wildlife, the Army Corps of Engineers, and United States Fish and Wildlife Service.

The site is vacant, and is relatively flat with gentle slopes ranging from 0-5 percent from east to west, save a fill pile near the center of the property that rises about 8-10 feet above grade. The site includes ruderal grasses, a smattering of bushes, and moderately dense riparian woodland areas along Sheehy Creek, which were planted as part of the creek restoration project. There is also a paved pathway located along the top of the bank of Sheehy Creek. No improvements or construction activity is proposed within the riparian area along the creek or within bed or bank. The site adjoins Devlin Road to the west and Sheehy Creek to the north. There is existing development adjoining the property to the south and across Devlin Road to the west. Undeveloped properties adjoin the east side of the site. Industrial development has been progressing in the general vicinity since the late 1980's.

A Biological Evaluation of the subject property, dated April 2018, was prepared by Zentner and Zentner. The analysis assessed the potential presence of special status species, habitats, wetlands or other jurisdictional waters, and other biological resources within the project site as well as potential project impacts, if any, to biological resources and recommended mitigation measures as needed. Site surveys were conducted on March 5, 2018, and April 11, 2018. According to the evaluation, the site consists primarily of ruderal or disturbed grasslands, with scattered coyote bush in the northern portion of the development area. The ruderal grassland vegetation is characterized by upland, mainly annual, grasses and forbs. Rippgut brome and soft chess along with wild oats are the dominant vegetation. However, Harding grass, a non-native and invasive species is invading the site, is dominant in some areas, and is common throughout the site. Cut-leaf geranium, black mustard, Italian thistle, and meadow barley are also prominent in portions of the ruderal grassland. Mustards and thistles dominate the vegetation on the fill pile. As noted above, moderately dense riparian woodland areas along Sheehy Creek were planted as part of the creek restoration project to provide a riparian buffer along the creek. According to the study, these plantings likely occurred around 2003 to 2004. Arroyo willow is situated adjacent to the creek which transitions to coyote brush mixed with California rose, native blackberry, elderberry, buckeye and live oak moving away from the creek to the south. No wetland areas were identified on the project site.

The Zentner and Zentner report included a review of USFWS and CDFW lists of special status animals and plant, the California Natural Diversity Database (CNDDDB) occurrence records for the local quads and the California Native Plant Society's (CNPS) inventory of Rare and Endangered Vascular Plants of California and other sources to define a list of special status species that could potentially occur on the project site or in the region. A complete list of all special status wildlife and plant species that may occur within the project's region is provided in the Zentner and Zentner report in Figures 4 and 5 and Appendix C.

No special-status plant species were observed during the field surveys by Zentner and Zentner despite surveys being conducted during the blooming period for most of the plants. Most of the special status plants known to occur within the region are associated with salt marshes or vernal pools, which are habitats that do not exist on the property.

No special-status animal species were observed on the site or within the project's vicinity during the field surveys. The majority of the special-status animal species occurring within the region are highly unlikely to occur on the project site due to a variety of reasons including the lack of suitable habitat on-site, lack of local occurrences, the site is out of range of the species, and the species were not observed on the project site. The report notes that although not seen on the site, several species have at least some potential to occur on the site at some time, including the California red-legged frog (CRLF), western pond turtle, Swainson's hawk, northern harrier, Ferruginous hawk, Cooper's hawk, white-tailed kite, as well as other nesting raptors and migratory nesting birds, and pallid, hoary, and Yuma Myotis bats.

According to the CNDDDB, there have been three observations of CRLF within five miles of the project site. All three occurrences are located south of the project site approximately two to just over four miles away. CRLF are not likely to occur on the project site as there is no breeding habitat on or near the site. Sheehy Creek, the only aquatic habitat near the project site, generally does not support deep water pools that are perennial or nearly perennial, which is essential for CRLF breeding. There are no known observations upstream of Sheehy Creek and CRLF are not likely to move through or towards the project site seeking summer habitat as there is no nearby breeding habitat. However, the project biologist does recommend a pre-construction survey in the unlikely event that a stray CRLF moves along the creek corridor. There have been eight occurrences of the western pond turtle noted by the CNDDDB within five miles of the project site, most occurring in ponds within developed areas north in Napa or south in Vallejo. Although none of the occurrences are associated with creeks such as Sheehy Creek, the report noted that Sheehy Creek does include some slow moving pools that could potentially provide habitat for the western pond turtle and there are suitable nesting areas adjacent to the creek. Although no turtles or nests were noted during the surveys and no construction is

proposed within the creek channel and riparian area, the Biologist recommends a pre-construction survey to ensure the absence of this species prior to project construction.

According to the CNDDDB, there have been seven observations of Swainson's hawk nests within a five-mile radius of the project site; six within one mile of the property. Swainson's hawk forage for insects, birds and small mammals such as voles, mice and gophers, and actively seek fields that are disced, mowed, flooded and harvested which force small mammals from their burrows. The report does not note the presence of any Swainson's hawk or if any of the nests were active during the surveys. Nor did the report note the presence of burrowing mammals (see Appendix for a listing of vertebrates recorded during the site visits.) The CNDDDB has one observation of a northern harrier approximately four miles southwest of the property recorded in 2004. Although the site contains moderately suitable foraging habitat and potential nesting habitat, primarily along Sheehy Creek's riparian woodland, no northern harriers have been observed within the immediate vicinity of the project site. Similar to the northern harrier, there has been one observation of a Ferruginous hawk within five miles of the project site. The occurrence includes 2 to 3 individuals in several valley oak trees adjacent to cultivated grasslands; neither conditions occur on the project site. Two other raptor species, the Cooper's hawk and the White-tailed kite, were noted in the report. Although neither species is included on the lists of observations or occurring within the area, the riparian corridor may provide potential nesting and/or foraging habitat for the two species. To ensure no adverse impacts occur to protected raptors as well as other raptors and migratory bird species, the project Biologist recommends a pre-construction survey presence or absence of nesting birds. The CNDDDB includes six records of the pallid bat within five miles of the project, all north and west of the property. Although no pallid, hoary, or Yuma Myotis bats were observed during the site visits or recorded by the CNDDDB as occurring on the site, the riparian areas along Sheehy Creek contains potential foraging and roosting habitat and a pre-construction survey is recommended by the project biologist to ensure that no bat species are present prior to construction activities.

As noted in the report, there are no known occurrences of any special status wildlife species on the project site or within Sheehy Creek. However, as noted above, the project biologist recommends pre-construction surveys particular to the aforementioned species to ensure that they are not present prior to construction. Mitigation measures BIO-1 through BIO-4, below, will reduce impacts to any special-status raptor species, including migratory birds protected under the Migratory Bird Treaty Act, special-status bat species, the CRLG and western pond turtle to a level of less than significant.

- d. The proposed project has been designed to avoid impacts to Sheehy Creek with the construction activity to occur completely outside of the riparian drip line. Construction impacts on wildlife movement in Sheehy Creek would be further reduced by a recorded 35-foot wide conservation easement measured from the top of bank. No development is allowed within the easement. The project would not impact the riparian corridor in any way that would impede movement of wildlife. Therefore, no significant impact would occur.
- e. The project would not conflict with any local policies protecting biological resources, such as tree preservation or the County's Conservation Regulations. The site is an improved industrial lot with little native vegetation. In accordance with the requirements of the NVBPS, new landscaping will be provided on the site. The project does not conflict with any County ordinance or requirement to preserve existing trees, and therefore is considered as not having potential for a significant impact thereto.
- f. The proposed project would not conflict with the provisions of adopted Habitat Conservation Plans, Natural Community Conservation Plans or other approved local, regional or state habitat conservation plans. There are no plans applicable to the subject parcel.

#### Mitigation Measures:

BIO-1: If construction would commence anytime during the nesting/breeding season of the Swainson's hawk, northern harrier, ferruginous hawk, Cooper's hawk, white-tailed kite, other raptors, or other bird species listed in the Migratory Bird Treaty Act (typically February 1 through September 30), a preconstruction survey of the project vicinity for nesting birds shall be conducted. This survey shall be conducted by a qualified biologist (experienced with the nesting behavior of bird species of the region) within 14 days prior to the commencement of construction activities that would occur during the nesting/breeding season. The intent of the survey will be to determine if active nests are present within or adjacent to the construction zone within approximately 250 feet (300 feet for raptors). The survey shall also be conducted in accordance with the protocol of the Swainson's Hawk Technical Advisory Committee's (TAC) *Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley*. The survey shall commence early in the Swainson's hawk nesting season (late March to early April) and surveys will be conducted within a minimum 0.25-mile radius of the Project area. The surveys shall be timed such that the last survey is concluded no more than two weeks prior to initiation of construction. If ground disturbance activities are delayed following a survey, then an additional pre-construction survey shall be conducted such that no more than two weeks will have elapsed between the last survey and the commencement of ground disturbance activities. If active nests are found in areas that could be directly or indirectly affected by the project, a no-disturbance buffer zone shall be created around active nests during the breeding season or until a qualified biologist determines that all young have fledged. If any active Swainson's hawk nests are found during the survey, CDFW recommends a disturbance buffer of at least a 0.25 mile to avoid a "take" or adverse impacts to Swainson's hawk. No trees or vegetation shall be removed from the project site during the breeding period. The size of the buffer zones and types of construction activities restricted within them should be determined through consultation with the CDFW depending on the species, taking into account factors such as the following:

- Noise and human disturbance levels at the construction site at the time of the survey and the noise and disturbance expected during the construction activity;
- Distance and amount of vegetation or other screening between the construction site and the nest; and
- Sensitivity of individual nesting species and behaviors of the nesting birds.

The buffer zone around an active nest should be established in the field with orange construction fencing or another appropriate barrier and construction personnel should be instructed on the sensitivity of nest areas. The qualified biologist should serve as a construction monitor during those periods when construction activities would occur near active nest areas of special status bird species to ensure that no impacts on these nests occur.

Method of Mitigation Monitoring: The permittee shall have a nesting bird survey completed prior to any construction activities scheduled to occur on the site from February 1 through September 30. The survey shall also be conducted in accordance with the protocol of the Swainson's Hawk Technical Advisory Committee's (TAC) *Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley*. The survey results shall be provided to the Napa County Planning, Building and Environmental Services. In the event any special-status or other protected nesting birds are found to occur on-site construction activities will be scheduled to avoid nesting and breeding periods and consultation will be sought with CDFW to develop appropriate measures to reduce potential impacts to nesting Swainson 's hawk which may include preservation of potential foraging habitat.

BIO 2: Prior to the commencement of construction activities during the breeding season of native bat species in California (generally occurring from April 1 through August 15), a qualified biologist shall conduct a focused survey to determine the presence/absence of any special status bat species. If bats are found the following measures will be implemented:

- A plan for removal or exclusion of any tree between October 16 and August 14 will be developed by a qualified biologist in conjunction with the CDFW.
- Trees that are to be removed between August 15 and October 15 will be trimmed and removed in a two-phased system conducted over two consecutive days under the supervision of a qualified biologist. The first day (afternoon), limbs, branches and trunks without cavities, crevices and deep bark fissures are removed by chainsaw only. Limbs and trunks with cavities, crevices and bark fissures would be avoided. On the second day, the remainder of the tree may be removed.

Method of Mitigation Monitoring: The permittee shall have a bat survey completed prior to any construction activities scheduled to occur on the site. The survey results shall be provided to the Napa County Planning, Building and Environmental Services. In the event bats are found to occur on-site consultation the measures listed above shall be implemented.

BIO 3: Within 48 hours prior to the commencement of construction activities, a qualified biologist shall conduct a preconstruction CRLF survey to ensure that no CRLF are located on or in proximity to the site. If CRLF are found, the CDFW and USFW will be contacted to determine appropriate mitigation measures and the work shall be halted until the consultations are completed.

Method of Mitigation Monitoring: The permittee shall have a CRLF survey completed prior to any construction activities scheduled to occur on the site. The survey results shall be provided to the Napa County Planning, Building and Environmental Services. In the event CRLF are found to occur on-site consultation will be sought with CDFW to develop appropriate measures to reduce potential impacts CRLF.

BIO 4: Within 48 hours prior to the commencement of construction activities, a qualified biologist shall conduct a preconstruction survey for western pond turtles to ensure that no pond turtles are located on or in proximity to the site. If pond turtles are found, the CDFW will be contacted to determine appropriate mitigation measures and the work shall be placed on hold until the consultation is completed.

Method of Mitigation Monitoring: The permittee shall have a western pond turtle survey completed prior to any construction activities scheduled to occur on the site. The survey results shall be provided to the Napa County Planning, Building and Environmental Services. In the event western pond turtle are found to occur on-site consultation will be sought with CDFW to develop appropriate measures to reduce potential impacts to the turtles.

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

Discussion:

a.-c. The project site is vacant and does not contain any structures. Research into past uses has not identified historic resources that may be present at the site. A previous archaeological survey, entitled "A Cultural Resource Inventory of the Napa Airport Master Environmental Assessment Area," prepared by Archaeological Resource Service (ARS), dated September 1983, was conducted in the Napa Valley Business Park Specific Plan area and included the project site. The study did not indicate the presence of historical, archaeological, or paleontological resources. In addition, the Napa County Environmental Resource Maps (based on the following layers –Historical sites points & lines, Archaeology sites and flags) do not identify any historical, archaeological, or paleontological resources, sites or unique geological features on the project site. There is no information in the County's files that would indicate that there is a potential for occurrence of these resources. The site has been previously graded when public improvements were installed. It is therefore not anticipated that any cultural resources are present on the site, and the potential for impact is considered less-than-significant. However, if resources are found during grading of the project, construction of the project is required to cease, and a qualified archaeologist will be retained to investigate the site in accordance with the following standard condition of approval that will be imposed on the project:

7.2 ARCHEOLOGICAL FINDING

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

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

d. No human remains have been encountered on the property during past grading activities when the public improvements were constructed and no information has been encountered that would indicate that this project would encounter human remains. However, if resources are found during grading of the project, construction of the project is required to cease, and a qualified archaeologist will be retained to investigate the site in accordance with standard condition of approval noted above.

**Mitigation Measures:** None required.

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

Discussion:

- a.
- i.) There are no known faults on the project site as shown on the most recent Alquist-Priolo Earthquake Fault Zoning Map. As such, the proposed facility would result in a less than significant impact with regards to the rupturing of a known fault.
  - ii.) All areas of the Bay Area are subject to strong seismic ground shaking. Construction of the facility will be required to comply with all the latest building standards and codes, including the California Building Code that would reduce any potential impacts to the maximum extent possible.
  - iii.) No subsurface conditions have been identified on the project site that indicated a susceptibility to seismic-related ground failure or liquefaction. Compliance with the latest edition of the California Building Code for seismic stability would reduce any impacts to a less than significant level.
  - iv.) The Napa County Environmental Resource Maps (Landslides line, polygon, and geology layers) did not indicate the presence of landslides on the property.
- b.
- Based upon the Soil Survey of Napa County, prepared by the United States Department of Agriculture (USDA), the site is comprised of soils in the Haire Loam series (2 to 9% slopes) which are characterized by slow runoff with little to no hazard of erosion. This nearly level soil type is found mainly on old terraces and alluvial fans. Project approval will require incorporation of best management practices and will be subject to the Napa County Stormwater Ordinance which addresses sediment and erosion control measures and dust control, as applicable, to ensure that development does not impact adjoining properties, drainages, and roadways.
- c/d.
- Pre-Quaternary deposits and bedrock underlay the majority of the site according to the Napa County Environmental Resource Maps (Surficial Deposits layer). Undifferentiated Holocene alluvium underlay a small area of the site adjoining Sheehy Creek. Based on the Napa County Environmental Sensitivity Maps (Liquefaction layer) the project site has very low susceptibility for liquefaction where the site is underlain by Pre-Quaternary deposits and bedrock and high susceptibility for liquefaction where the site is underlain by Holocene alluvium. Development will be required to comply with all the latest building standards and codes, including the California Building Code that would reduce any potential impacts to a less than significant level. In addition, a soils report, prepared by a qualified Engineer will be required as part of the building permit submittal. The report will address the soil stability, potential for liquefaction and will be used to design specific foundation systems and grading methods which will reduce potential impacts to less than significant.

- e. The project will connect to municipal water service provided by the City of American Canyon and sewer service by Napa Sanitation District. "Will Serve" letters have been provided by the affected jurisdictions indicating that they have sufficient capacity to accommodate the water and wastewater demand of this project. (see **Section XVII Utilities and Service Systems (d)**, below.)

**Mitigation Measures:** None required.

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

Discussion:

Napa County has been working to develop a Climate Action Plan (CAP) for several years. In 2012 a Draft CAP<sup>2</sup> (March 2012) was recommended using the emissions checklist in the Draft CAP, on a trial basis, to determine potential greenhouse gas (GHG) emissions associated with project development and operation. At the December 11, 2012, Napa County Board of Supervisors (BOS) hearing, the BOS considered adoption of the proposed CAP. In addition to reducing Napa County's GHG emissions, the proposed plan was intended to address compliance with CEQA for projects reviewed by the County and to lay the foundation for development of a local offset program. While the BOS acknowledged the plan's objectives, the BOS requested that the CAP be revised to better address transportation-related greenhouse gas, to acknowledge and credit past accomplishments and voluntary efforts, and to allow more time for establishment of a cost-effective local offset program. The Board also requested that best management practices be applied and considered when reviewing projects until a revised CAP is adopted to ensure that projects address the County's policy goal related to reducing GHG emissions.

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

a/b. Overall increases in Greenhouse Gas (GHG) emissions in Napa County were assessed in the Environmental Impact Report (EIR) prepared for the Napa County General Plan Update and certified in June 2008. GHG emissions were found to be significant and unavoidable in that document, despite the adoption of mitigation measures incorporating specific policies and action items into the General Plan.

Consistent with these General Plan action items, Napa County participated in the development of a community-wide GHG emissions inventory and "emission reduction framework" for all local jurisdictions in the County in 2008-2009. This planning effort was completed by the Napa County Transportation and Planning Agency in December 2009, and served as the basis for development of a refined inventory and emission reduction plan for unincorporated Napa County.

During our ongoing planning effort, the County requires project applicants to consider methods to reduce GHG emissions consistent with Napa County General Plan Policy CON-65(e). (Note: Pursuant to State CEQA Guidelines Section 15183, because this initial study assesses a project that is consistent with an adopted General Plan for which an environmental impact report (EIR) was prepared, it appropriately focuses on impacts which are "peculiar to the project," rather than the cumulative impacts previously assessed.) For the purposes of this analysis potential GHG emissions associated with 'construction' and 'development' and with 'ongoing' business operations have been discussed.

GHGs are the atmospheric gases whose absorption of solar radiation is responsible for the greenhouse effect, including carbon dioxide, methane, ozone, and the fluorocarbons, that contribute to climate change (a widely accepted theory/science that explains human effects on

<sup>2</sup> County of Napa, March 2012, Napa County Draft Climate Action Plan, Prepared by ICF International. Sacramento, CA

the atmosphere). Carbon Dioxide (CO<sub>2</sub>) gas, the principal greenhouse gas (GHG) being emitted by human activities, and whose concentration in the atmosphere is most affected by human activity, also serves as the reference gas to compare other greenhouse gases. Typical sources of carbon emissions include land clearing, land use change, biomass burning, and motor vehicle and equipment. Equivalent Carbon Dioxide (CO<sub>2</sub>e) is the most commonly reported type of GHG emission and a way to get one number that approximates total emissions from all the different gasses that contribute to GHG (BAAQMD CEQA Air Quality Guidelines, May 2012). In this case, carbon dioxide (CO<sub>2</sub>) is used as the reference atom/compound to obtain atmospheric carbon CO<sub>2</sub> effects of GHG. Carbon stocks are converted to carbon dioxide equivalents (CO<sub>2</sub>e) by multiplying the carbon total by 44/12 (or 3.67), which is the ratio of the atomic mass of a carbon dioxide molecule to the atomic mass of a carbon atom.

One time "Construction Emissions" associated with the project includes: i) the carbon stocks that are lost (or released) when existing vegetation is removed and soil is ripped in preparation for the new building, parking lot and associated infrastructure; and ii) emissions associated with the energy used to develop and prepare the project area and construct the project, including construction equipment and worker vehicle trips (hereinafter referred to as Equipment Emissions). These emissions also include underground carbon stocks (or Soil carbon) associated with the existing vegetation that is proposed to be removed.

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

As discussed in the Air Quality section of this Initial Study, in 2010, the BAAQMD adopted and later incorporated into its 2011 CEQA Guidelines project screening criteria (Table 3-1 – Criteria Air Pollutants and Precursors & GHG Screening Level Sizes) and thresholds of significance for air pollutants, including GHG emissions, which have now been updated by BAAQMD through May 2017. The proposed facility is approximately 40,085 square feet of floor area inclusive of approximately 2,065 square feet of office area. When compared to the BAAQMD's GHG screening criteria of 121,000 square feet for general industrial, the project was determined not to exceed the 1,100 MT of CO<sub>2</sub>e/yr.

In addition, the applicant has indicated that the project will incorporate the following voluntary best management practices: generation of on-site renewable energy, a Transportation Demand Management plan which will include employee carpool or van pool and bike riding incentives; bicycle route improvements; connection to recycled water; low impact development; water efficient landscaping; recycle 75% of waste; and composting. Additional items are included in the Voluntary Best Management Practices Checklist for Development Projects form included with the Use Permit Application. Greenhouse Gas Emission reductions from local programs and project level actions, such as application of the Cal Green Building Code, vehicle fuel efficiency standards, and the project-specific on-site programs identified above would combine to further reduce emissions below BAAQMD thresholds.

The increase in emissions anticipated as a result of the project would be minor and the project is in compliance with the County's efforts to reduce emissions as described above. Accordingly, the project's impacts would be less than significant.

**Mitigation Measures:** None required.

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
VIII.	<b>HAZARDS AND HAZARDOUS MATERIALS.</b> Would the project:				
	a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	b) Create a significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury or death involving wild-land fires, including where wild-lands are adjacent to urbanized areas or where residences are intermixed with wild-lands?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion:

- a. The proposed project will not involve the transport of hazardous materials other than those small amounts normally used in construction of the building. A Business Plan will be filed with the Environmental Health Division should the amount of hazardous materials reach reportable levels. However, in the event that the proposed use or a future use involves the use, storage or transportation of greater than 55 gallons or 500 pounds of hazardous materials, a use permit and subsequent environmental assessment would be required in accordance with the Napa County Zoning Ordinance prior to the establishment of the use. During construction of the project some hazardous materials, such as building coatings/ adhesives/ etc., will be utilized. However, given the quantities of hazardous materials and the limited duration of construction activity, they will result in a less-than-significant impact.
- b. The project would not result in the release of hazardous materials into the environment.
- c. There are no schools located within one-quarter mile from the proposed project site.
- d. The proposed site is not on any known list of hazardous materials sites.
- e. The project site is located within two miles of the Napa County Airport, and is therefore subject to the requirements of the County's Airport Compatibility Combination zoning district and the requirements of the Napa County Airport Land Use Compatibility Plan. The project site is located within Zone D of the compatibility plan which is an area of common overflight and moderate risk. The proposed use of the building is highly compatible with the risk and noise impacts associated with properties within Zone D. The building has also been designed to comply with specific requirements regarding light and glare to ensure airport land use compatibility. County development regulations have been certified as meeting ALUC compatibility requirements, and consequently the project is not subject to separate ALUC review because it has been designed to comply with County airport compatibility land use requirements.
- f. The project site is not located within the vicinity of any private airports.
- g. The proposed driveway that would serve the project will be designed to comply with County standards and access to the building has been designed to accommodate fire apparatus and large trucks. The project has been reviewed by the County Fire Department and Engineering Services Division and found acceptable as conditioned. Therefore, the design of the project will not negatively impact or hinder emergency vehicle access.
- h. The project would not increase exposure of people and/or structures to a significant loss, injury or death involving wild land fires because the project is located within an urbanized area.

**Mitigation Measures:** None required.



	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
IX. <b>HYDROLOGY AND WATER QUALITY.</b> Would the project:				
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
j) Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

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

- a. The proposed project will not violate any known water quality standards or waste discharge requirements. The project will discharge into an approved storm drainage system designed to accommodate the drainage from this site. The applicant is required to obtain a stormwater permit from the Regional Water Quality Control Board (RWQCB) which is administered in part by the County Engineering Services Division on behalf of the RWQCB. Given the essentially level terrain, and the County's Best Management Practices, which comply with RWQCB requirements, the project does not have the potential to significantly impact water quality and discharge standards.
- b. The project will receive water from the City of American Canyon. The project is located within an area designated for urban development by the City of American Canyon. The City has acquired water rights to provide adequate water for all areas within their service area. The City has reviewed the proposed project and determined that in order to comply with the City's Zero Water Footprint (ZWF) Policy the applicant shall contribute to the City's water conservation fund and has issued a Will Serve letter for the proposal. No groundwater wells are associated with this property. (see **Section XVII Utilities and Service Systems (d)**, below.)

- c/d. The proposed project will not substantially alter the drainage pattern on site or cause a significant increase in erosion or siltation on or off site. The project will incorporate erosion control measures appropriate to its maximum slope to manage onsite surface drainage and erosion of onsite soils during construction and winter months (October to April). As noted above, the project is required to comply with County Engineering Services Division requirements which are consistent with RWQCB standards. These established Best Management Practices have been successfully implemented on numerous previous projects within the NVBPSP area. By incorporating erosion control measures, this project would have a less than significant impact. No substantial alteration of existing drainage is anticipated to occur. There will be an increase in the overall impervious surface resulting from the new buildings, pavement and sidewalks. However, given the size of the drainage basin, the increase in impervious surfaces will not discernibly change the amount of groundwater filtration or discernibly increase surface runoff from that which currently exists on site. Project impacts related to drainage patterns and off-site flows are expected to be less than significant.
- e. The existing storm drainage system is designed to County standards and is sized to accommodate all drainage from this site.
- f. The project includes water quality detention and treatment basins which provide treatment of the stormwater by filtering pollutants prior to discharge into the storm drain system. There are no other factors in this project that would otherwise degrade water quality.
- G-i. According to Napa County environmental resource mapping (*Floodplain* and *Dam Levee Inundation* layers), the project site is not located within a flood hazard area, nor would it impede or redirect flood flows or expose structures or people to flooding. The project site is not located within a dam or levee failure inundation zone.
- j. In coming years, higher global temperatures are expected to raise sea level by expanding ocean water, melting mountain glaciers and small ice caps, and causing portions of Greenland and the Antarctic ice sheets to melt. The Intergovernmental Panel on Climate Change estimates that the global average sea level will rise between 0.6 and 2 feet over the next century (IPCC, 2007). However, the project area is located at approximately 56 to 65 feet above mean sea level. There is no known history of mud flow in the vicinity. The project will not subject people or structures to a significant risk of inundation from tsunami, seiche, or mudflow.

**Mitigation Measures:** None required

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
X. <b>LAND USE AND PLANNING.</b> Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

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

**Mitigation Measures:** None required.

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

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

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

**Mitigation Measures:** None required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>XII. NOISE.</b> Would the project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

a/b. The proposed project will result in a temporary increase in noise levels during the construction of the building, parking areas, and associated improvements. Construction activities will be limited to daylight hours using properly muffled vehicles. Noise generated during this time is not anticipated to be significant. The proposed project would not result in long-term significant permanent construction noise impacts or operational impacts. Furthermore, construction activities would generally occur during the period of 7am-7pm on weekdays, during normal hours of human activity. All construction activities will be conducted in compliance with the Napa County Noise Ordinance (N.C.C. Chapter 8.16).

c/d. The anticipated level of noise to occur following the completion of construction including the operation of the facility would be typical of a light industrial/manufacturing/warehouse/distribution use in an existing industrial park. The project is located within an industrial park and is not in an area where noise increases resulting from additional industrial development will impact sensitive receptors. The design of the proposed project, together with adherence to the County Noise Ordinance, would ensure the proposed project would not result in adverse noise impacts.

e. The proposed project site is located within compatibility Zone D of the Napa County Airport, which is an area of common aircraft overflight. As such, persons on the project site will be exposed to noise from regular aircraft overflight. The Napa County Zoning Code, section 8.16.070 Exterior noise limits, lists the maximum allowable level for Industrial areas as 75 dbA. Based on the County General Plan Community Character Element, figure CC-1: Napa County Airport Projected Noise Levels (dBA CNEL), the project site is located outside of the airport area projected to have levels of 55 dbA or less, which is less than the maximum allowed in the Industrial area. Therefore the location of the project within the airport land use area will have a less than significant impact on people working in the project area. The nature of the uses

allowed in the Industrial Park (IP) zoning is not sensitive to increased noise levels from aircraft, and is considered compatible with aircraft operations.

f. The project is not within the vicinity of a private airstrip.

**Mitigation Measures:** None required.

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

Discussion:

The Association of Bay Area Governments' *Projections 2003* figures indicate that the total population of Napa County is projected to increase some 23 percent by the year 2030 (*Napa County Baseline Data Report*, November 30, 2005). Additionally, the County's *Baseline Data Report* indicates that total housing units currently programmed in county and municipal housing elements exceed ABAG growth projections by approximately 15 percent. The project will be subject to the County's housing impact mitigation fee, which provides funding to meet local housing needs.

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

a. The project site is currently vacant and located in a developing industrial area. The project will increase the number of jobs within the industrial park. However, given the size of the project, the new jobs are considered to be relatively small compared to the overall business park and nearby communities; therefore this increase in jobs will not contribute to a cumulatively considerable increase in the demand for housing units within Napa County and the general vicinity. As noted above, the County has adopted a Housing Element which identifies locations for new affordable housing, and adopted a development impact fee. The fee provides funds for constructing affordable housing to off-set the cumulative existing affordable housing shortage in the County. The fee is paid at the time building permits are issued. This fee is charged to all new non-residential developments based on the gross floor area of non-residential space multiplied by the applicable fee by type of use as required under Chapter 18.107, of the Napa County Code and is considered to reduce housing impacts to a less than significant level.

b/c. There are no existing homes on, or adjacent to, the project site. The project will not result in the displacement of any housing units or people.

**Mitigation Measures:** None required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
XIV. <b>PUBLIC SERVICES.</b> Would the project result in:				
a) Substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion:

- a. The proposed project will have a less than significant impact on public services. Fire protection measures are required as part of the development and there would be no expected impact to response time as the property has good public road access. School impact mitigation fees will be levied with the building permit application. Those fees assist local school districts with capacity building measures, and by law are considered full mitigation for any impacts. The project will have little impact on public parks. County revenue resulting from building permit fees, and property tax increases will help meet the costs of providing public services to the property.

**Mitigation Measures:** None required.

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

Discussion:

- a/b. This application proposes a new light industrial/warehouse building and on-site employment. No portion of this project, nor any foreseeable result thereof, would significantly increase the use of existing recreational facilities. This project does not include recreational facilities that would have a significant adverse effect on the environment.

**Mitigation Measures:** None required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>XVI. TRANSPORTATION/TRAFFIC.</b> Would the project:				
a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system and/or conflict with General Plan Policy CIR-16, which seeks to maintain an adequate Level of Service (LOS) at signalized and unsignalized intersections, or reduce the effectiveness of existing transit services or pedestrian/bicycle facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the Napa County Transportation and Planning Agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature, (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with General Plan Policy CIR-23, which requires new uses to meet their anticipated parking demand, but to avoid providing excess parking which could stimulate unnecessary vehicle trips or activity exceeding the site's capacity?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

a/b. Weekday traffic volumes within the project vicinity consist primarily of commute traffic within the peak traffic periods, with residential flows from nearby communities and commercial, tourist, and industrial park traffic occurring throughout the day. Southern Napa County is characterized by two distinct commute traffic patterns: a Napa to Bay Area commute and a Solano County to Napa commute. The existing traffic congestion and potential cumulative impacts are primarily the result of regional growth impacts.

The Metropolitan Transportation Commission (MTC) serves as the transportation planning, coordinating and financing agency for the nine-county San Francisco Bay Area. The MTC created and maintains the Metropolitan Transportation System (MTS), a multimodal system of highways, major arterials, transit service, rail lines, seaports and airports. MTS facilities within the vicinity of the project site include State Routes 12, 29, 121, and 221, and Airport Boulevard. The State routes are maintained and operated by the California Department of Transportation (Caltrans.) The MTS is incorporated into MTC's 2001 Regional Transportation Plan (RTP), and is used as a guideline in prioritizing for planning and funding of facilities in the Bay Area.

Major improvements to both Highway 29 and Highway 12 are necessary to address existing and cumulative regional traffic congestion. The RTP and the Napa County General Plan 2008 update identify roadway improvements in South Napa County to address potential cumulative impacts. These improvements include construction of a flyover ramp at SR 12/29/221 intersection, construction of a new interchange at SR 12/Airport Blvd/SR 29 intersection, widening Jamieson Canyon (SR 12) to four lanes (recently completed), widening SR 29 to six lanes between south Airport Blvd and the south County line (in coordination with the City of American Canyon), and extending Devlin Road south to Green Island Road. These improvements are not yet fully funded, except as noted above, but are expected to be in place by 2030 addressing potential cumulative impacts in the southern part of the County.

As mandated by Napa County, projects within the industrial park are responsible for paying "fair share" costs for the construction of improvements to impacted roadways within the NVBPSP. Since 1990, the County has imposed and collected traffic mitigation fees on all development projects within the NVBPSP area. A developer's "fair share" fee goes toward funding roadway improvements within the NVBPSP area including improvements designed to relieve traffic on State Highways. The traffic mitigation fee is further described in Board of Supervisor's Resolution 08-20. For this project, a traffic mitigation fee based on PM peak hour vehicle trips will be imposed and collected prior to issuance of a building permit as determined by the Director of Public Works.

The County has established that a significant traffic impact would occur if increases in traffic from a project would cause intersections or two-lane highway capacity to deteriorate to worse than LOS E, or at intersections or two-lane highway where base case (without project) is LOS

F, a significant impact is considered to occur if a project increases the base volumes by more than one percent. Napa County utilizes a one percent significance threshold for the identification of significant adverse traffic impact during peak hours of travel. This threshold was directed by the Napa County Transportation and Planning Agency. This factor has been used consistently as the significance determination for all recent EIR and CEQA documents within the NVBPSP area.

According to the Institute of Traffic Engineers (ITE), Trip Generation, 9<sup>th</sup> Edition, 2012, manufacturing uses, defined as primarily converting raw materials or parts into finished products that may include office and warehousing, are expected to generate 3.82 daily vehicle trips and 0.73 PM peak period vehicle trips per 1,000 sq. ft. of gross floor area. By comparison, warehousing uses, defined as primarily the storage of materials that may include office and maintenance areas, are expected to generate 3.56 daily vehicle trips and 0.32 p.m. peak period vehicle trips per 1,000 sq. ft. of gross floor area. Light Industrial uses, defined as a free-standing single business, are expected to generate 6.97 daily vehicle trips and 0.97 p.m. peak period vehicle trips per 1,000 sq. ft. of floor area. Based on the proposed 40,085 sq. ft. of floor area, approximately 143 to 279 total daily vehicle trips would be generated based on warehousing or light industrial trip generation rates, respectively. The proposed project would generate approximately 13 to 39 trips during the p.m. peak period based on warehousing or light industrial p.m. peak trip generation rates, respectively. Approximately 153 total daily vehicle trips would be generated for manufacturing uses with 29 trips during the p.m. peak period.

According to information from the California Department of Transportation traffic counts taken in 2016 indicate the traffic volume at the State Highway 12/29 intersection was approximately 46,000 to 67,000 average annual daily vehicle trips. Peak hour trips were approximately 3,800 to 5,400 vehicles. As noted above, the proposed project would generate approximately 13 to 39 trips during the p.m. peak period based on warehousing or light industrial p.m. peak trip generation rates, respectively, which represents a contribution of approximately 0.3% to 0.7% to the traffic levels on local roadways and intersections and deterioration in their level of service. This less than 1% increase is considered a less-than-significant level with the payment of the "fair share" development impact fee prior to issuance of a building permit as described in Board Resolution No. 08-20.

- c. The project does not have any impact on air traffic patterns.
- d/e. The project includes construction of a new driveway on Devlin Road. The site can also be accessed from the property to south via an existing shared access drive. The new driveway has been designed to comply with all County standards. The project will not result in any changes to levels of service or cause any new safety risks.
- f. Based on the proposed floor area of the building (38,020 sq. ft. of warehouse and 2,065 sq. ft. of office) 39 parking spaces would be required in accordance with the requirements of the NVBPSP based on the floor area and proposed use(s). The project has been designed with 58 vehicle parking spaces on-site. The project will not result in inadequate parking.
- g. The proposed project does not conflict with any known policies or plans supporting alternative transportation.

**Mitigation Measures:** None required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>XVII. TRIBAL CULTURAL RESOURCES.</b> Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

- a/b. Pursuant to Public Resources Code section 21080.3.1, invitation for tribal consultation was completed. One response was received from the Middletown Rancheria dated September 12, 2017. The letter indicates that while the Middletown Rancheria has no comments, they would

like to be notified should any resources be found. If any resources are found during earth disturbing activities, construction of the project would be required to cease and the appropriate individuals contacted in accordance with standard conditions of approval and Mitigation Measure CULT 1, as noted above in **Section V. Cultural Resources**.

**Mitigation Measures:** None required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
<b>XVII. UTILITIES AND SERVICE SYSTEMS.</b> Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Require or result in the construction of a new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Require or result in the construction of a new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Discussion:**

- a. The project will occur within an urbanized area and connect to a publicly maintained wastewater treatment system. The wastewater provider, Napa Sanitation District, has provided a Will Serve letter and has found the project to be in compliance with district master plans. The District's wastewater treatment plant complies with all water quality discharge requirements, and therefore the project will comply with regional water quality control standards and therefore has a less than significant impact.
- b. The project will not require construction of any new water or wastewater treatment facilities that will result in a significant impact to the environment. The project site is located in an area planned for industrial development and existing water and wastewater treatment facilities have been sized to accommodate the proposed project.
- c. The proposed project includes the construction of new drainage facilities. The new drainage system will be designed by a qualified engineer and is subject to review and approval by the Engineering Services Division. The Engineering Services Division has included conditions of approval requiring that the drainage system be designed to avoid diversion or concentration of storm water runoff onto adjacent properties.
- d. On January 14, 2014, Governor Jerry Brown declared a drought emergency in the state of California. That declaration was followed up on April 1, 2015, when the Governor directed the State Water Resources Control Board to implement mandatory water reductions in cities and town across California to reduce water usage by 25 percent. However, on April 7, 2017, Governor Jerry Brown signed an executive order lifting California's drought emergency in all but four counties (Fresno, Kings, Tulare and Tuolumne).

The project will receive water from the City of American Canyon. On October 23, 2007, the City of American Canyon adopted a Zero Water Footprint (ZWF) Policy which defines a ZWF as "no net loss of water service reliability or increase in water rates to the City of American Canyon's existing water service customers due to requested increase demand for water within the City's water service area." The City prepared a Water Supply Report (WSR) dated December 21, 2017, incorporated herein by reference, to determine if the requested water service is consistent with City ordinances, policies and practices; whether the City's water supply is sufficient to grant the request; and, establish a water allocation for the property. The WSR indicates the property has a baseline water footprint of zero gallons per day (gpd) because the project site is undeveloped and has no historic water use. The request includes an anticipated water demand of 1,788 gpd



annualized average-day demand (AADD) and 4,090 gpd maximum day demand (MDD.) The City has determined that in order to comply with the City's Zero Water Footprint (ZWF) Policy the applicant must offset the new AADD. According to the WSR, the applicant has committed to a financial contribution to the City's Zero Water Footprint Mitigation Fund which is the primary funding source for the City's Water Conservation Program. Payment of the mitigation funds offset the property's increased AADD. In accordance with the WSR, the City has issued a will-serve letter for water service subject the ZWF offset described above and other conditions outlined in the City's letter received January 23, 2018, and incorporated as conditions of project approval.

- e. See response "a." above.
- f. The proposed project will be served by a landfill with sufficient capacity to meet the projects demands. A less than significant impact will occur from the disposal of solid waste generated by the proposed project.
- g. The proposed project will comply with federal, state, and local statutes and regulations related to solid waste.

**Mitigation Measures:** None required.

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

Discussion:

- a. The site has been previously disturbed and does not contain any known listed plant or animal species. The project will not degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal. As discussed in Section IV above, although no special-status were found during site surveys, mitigation measures are proposed to conduct pre-construction surveys in the event that special-status species inhabit the site prior to construction. All potential biological related impacts would be less than significant. As identified in Section V above, no known historically sensitive sites or structures, archaeological or paleontological resources, sites of unique geological features have been identified within the project site. No historic or prehistoric resources are anticipated to be affected by the proposed project nor will the proposed project eliminate important examples of the major periods of California history or prehistory. In the event archaeological artifacts are found, a standard condition of approval and mitigation measure would be incorporated into the project. Impacts would be less than significant.
- b. The project does not have impacts that are individually limited but cumulatively considerable. Potential air quality, greenhouse gas emissions, hydrology, and traffic impacts are discussed in the respective sections above. The analysis determined that all potential impacts were less than significant and would not contribute significantly to cumulative impacts. The project does not propose new development that would have a significant impact on the environment or substantially change the existing conditions. With the imposition of standard and project specific conditions of approval, the project does not have impacts that are individually limited, but cumulatively considerable.
- c. All impacts identified in this Initial Study are less than significant and do not require mitigation. Therefore, the proposed project would not result in environmental effects that cause substantial adverse effects on human beings either directly or indirectly. Impacts would be less than significant.

**Mitigation Measures:** None required.

**MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measure	Monitoring Responsibility	Monitoring/Reporting Action and Schedule	Monitoring Compliance Complete (Name / Date)
<b>Biological Resources (IV)</b>			
<p>BIO-1: If construction would commence anytime during the nesting/breeding season of the Swainson's hawk, northern harrier, ferruginous hawk, Cooper's hawk, white-tailed kite, other raptors, or other bird species listed in the Migratory Bird Treaty Act (typically February 1 through September 30), a preconstruction survey of the project vicinity for nesting birds shall be conducted. This survey shall be conducted by a qualified biologist (experienced with the nesting behavior of bird species of the region) within 14 days prior to the commencement of construction activities that would occur during the nesting/breeding season. The intent of the survey will be to determine if active nests are present within or adjacent to the construction zone within approximately 250 feet (300 feet for raptors). The survey shall also be conducted in accordance with the protocol of the Swainson's Hawk Technical Advisory Committee's (TAC) <i>Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley</i>. The survey shall commence early in the Swainson's hawk nesting season (late March to early April) and surveys will be conducted within a minimum 0.25-mile radius of the Project area. The surveys shall be timed such that the last survey is concluded no more than two weeks prior to initiation of construction. If ground disturbance activities are delayed following a survey, then an additional pre-construction survey shall be conducted such that no more than two weeks will have elapsed between the last survey and the commencement of ground disturbance activities. If active nests are found in areas that could be directly or indirectly affected by the project, a no-disturbance buffer zone shall be created around active nests during the breeding season or until a qualified biologist determines that all young have fledged. If any active Swainson's hawk nests are found during the survey, CDFW recommends a disturbance buffer of at least a 0.25 mile to avoid a "take" or adverse impacts to Swainson's hawk. No trees or vegetation shall be removed from the project site during the breeding period. The size of the buffer zones and types of construction activities restricted within them should be determined through consultation with the CDFW depending on the species, taking into account factors such as the following:</p> <ul style="list-style-type: none"> <li>• Noise and human disturbance levels at the construction site at the time of the survey and the</li> </ul>	<p>Planning Division</p>	<p>The permittee shall have a nesting bird survey completed prior to any construction activities scheduled to occur on the site from February 1 through September 30. The survey shall also be conducted in accordance with the protocol of the Swainson's Hawk Technical Advisory Committee's (TAC) <i>Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley</i>. The survey results shall be provided to the Napa County Planning, Building and Environmental Services. In the event any special-status or other protected nesting birds are found to occur on-site construction activities will be scheduled to avoid nesting and breeding periods and consultation will be sought with CDFW to develop appropriate measures to reduce potential impacts to nesting Swainson's hawk which may include preservation of potential foraging habitat.</p>	

Mitigation Measure	Monitoring Responsibility	Monitoring/Reporting Action and Schedule	Monitoring Compliance Complete (Name / Date)
<p>noise and disturbance expected during the construction activity;</p> <ul style="list-style-type: none"> <li>Distance and amount of vegetation or other screening between the construction site and the nest; and</li> <li>Sensitivity of individual nesting species and behaviors of the nesting birds.</li> </ul> <p>The buffer zone around an active nest should be established in the field with orange construction fencing or another appropriate barrier and construction personnel should be instructed on the sensitivity of nest areas. The qualified biologist should serve as a construction monitor during those periods when construction activities would occur near active nest areas of special status bird species to ensure that no impacts on these nests occur.</p> <p>BIO 2: Prior to the commencement of construction activities during the breeding season of native bat species in California (generally occurring from April 1 through August 15), a qualified biologist shall conduct a focused survey to determine the presence/absence of any special status bat species. If bats are found the following measures will be implemented:</p> <ul style="list-style-type: none"> <li>A plan for removal or exclusion of any tree between October 16 and August 14 will be developed by a qualified biologist in conjunction with the CDFW.</li> <li>Trees that are to be removed between August 15 and October 15 will be trimmed and removed in a two-phased system conducted over two consecutive days under the supervision of a qualified biologist. The first day (afternoon), limbs, branches and trunks without cavities, crevices and deep bark fissures are removed by chainsaw only. Limbs and trunks with cavities, crevices and bark fissures would be avoided. On the second day, the remainder of the tree may be removed.</li> </ul> <p>BIO 3: Within 48 hours prior to the commencement of construction activities, a qualified biologist shall conduct a preconstruction CRLF survey to ensure that no CRLF are located on or in proximity to the site. If CRLF are found, the CDFW and USFW will be contacted to determine appropriate mitigation measures and the work shall be halted until the consultations are completed.</p>		<p>The permittee shall have a bat survey completed prior to any construction activities scheduled to occur on the site. The survey results shall be provided to the Napa County Planning, Building and Environmental Services. In the event bats are found to occur on-site consultation the measures listed above shall be implemented.</p> <p>The permittee shall have a CRLF survey completed prior to any construction activities scheduled to occur on the site. The survey results shall be provided to the Napa County Planning, Building and Environmental Services. In the event CRLF are found to occur on-site consultation will be sought with CDFW to develop appropriate measures to reduce potential impacts CRLF.</p>	

Mitigation Measure	Monitoring Responsibility	Monitoring/Reporting Action and Schedule	Monitoring Compliance Complete (Name / Date)
<p>BIO 4: Within 48 hours prior to the commencement of construction activities, a qualified biologist shall conduct a preconstruction survey for western pond turtles to ensure that no pond turtles are located on or in proximity to the site. If pond turtles are found, the CDFW will be contacted to determine appropriate mitigation measures and the work shall be placed on hold until the consultation is completed.</p>		<p>The permittee shall have a western pond turtle survey completed prior to any construction activities scheduled to occur on the site. The survey results shall be provided to the Napa County Planning, Building and Environmental Services. In the event western pond turtle are found to occur on-site consultation will be sought with CDFW to develop appropriate measures to reduce potential impacts to the turtles.</p>	