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Initial Study/Mitigated Negative
Declaration

Soscol Ferry Solar Facility
Use Permit
#P19-00308-UP
Hearing December 18, 2019

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

Initial Study Checklist
(form updated January 2019)

1. **Project Title:** Soscol Ferry Solar Facility, Use Permit # P19-00338
2. **Property Owner:** Kimbal Griggs Giles & Theres Blodgett-Giles
3. **County Contact Person, Phone Number and email:** Sean Kennings, contract planner, (415) 533-2111, sean@lakassocaites.com
4. **Project Location and Assessor's Parcel Number (APN):** 057-170-001 (1200 block of Soscol Ferry Road)
5. **Project sponsor's name and address:** Aarom Halimi, 2914 Larkin Street, San Francisco, CA 94109; RP Napa Solar 2, LLC, 655 Montgomery Street, Suite 1430, San Francisco, CA 94111
6. **General Plan description:** Industrial
7. **Zoning:** Industrial Park / Airport Compatibility (IP:AC)
8. **Background/Project History:**

The subject property is located within an industrially designaed area that originally dates to the early 1970's and was formalized into an industrial park specific plan in 1986. When the property was initially zoned for industrial use, the property was vacant/undeveloped containing grassland habitat with trees. In 1984 the subject property and parcel to the south, which were in common ownership at the time, were rezoned AW – Agricultural Watershed. About the same time a vineyard was planted which is evident in the 1982 aerial photograph. In 1987 the zoning was changed back to industrial to be consistent with 1986 industrial park specific plan. The vineyard on the property to the south was removed at some point between 2007 and 2009 (based on aerial photography), and may have been in separate ownership from the subject property by that time. The vineyard on the subject property remains, and the property owner indicates that it is currently dry farmed and the vines are near the end of their useful life.

(Readers should note that there are historically at least three different spellings of the "Suscol" or "Soscol". This has manifest itself with the formally recognized spelling of the stream being "Suscol Creek" while the nearby public road being spelled "Soscol Ferry Road".)
9. **Description of Project.**

The project consists of a request to construct a commercial renewable energy facility on approximately 15 acres of an approximately 22.4-acre parcel located within the Napa Valley Business Park Specific Plan (NVBPSP), and will consists of two arrays that will generate a total of approximately 2 megawatts (MW) AC (3.0 MW DC) of solar energy for interconnect to PG&E's preexisting electrical distribution system, which exists on-site. The power generated from this facility will be sold to Marin Clean Energy (MCE) through a long-term Power Purchase Agreement (PPA). Electricity generated from the Project is anticipated to power approximately 750 homes per year. The request includes a Variation to the development regulations of the Napa Valley Business Park Specific Plan to: 1) Provide on-site access from a 12 ft. wide gravel access road in lieu of a 20 ft. wide paved driveway; 2) waive all site landscaping requirements; 3) waive street improvement requirements including installation of curb, gutter, sidewalk and frontage landscaping. The 22.4 acre property is located on the south side of Suscol Creek south of Soscol Ferry Road. Access to the site is from a private drive which commences where the access road to Napa Sanitation District's sewage treatment plant intersects with Soscol Ferry Road, approximately ¼ mile west of its intersection with State Route 29, 12, 221.

The Project will utilize approximately 7,896 solar modules and 16 string inverters for converting solar energy into useable AC power. Single axis tracking technology will be utilized to allow the modules to efficiently track the sun throughout the day and maximize the efficiency of solar collection. The modules will be mounted on a steel racking system, which will be anchored into the ground using driven steel piers. The overall height of the array will be no more than 8 feet tall to finished grade.

Other improvements include chain link security fencing located along the southern, eastern and western property lines, and along the 150 ft. stream setback boundary located within the northern portion of the site. No improvements are proposed within the 150 ft. stream setback area (the northern boundary of the site is located approximately at the centerline of the channel for Suscol Creek). Stormwater control improvements consist of low impact development designs including limiting development envelope, maintaining the 150 ft. stream setback, minimizing imperviousness, use of permeable road surfaces, dispersal of runoff to grass covered pervious areas. Slopes on the property are approximately 1% with low runoff flow velocities suitable for attenuating runoff with grassy pervious areas.

The Project proposes approximately 15 acres (68%) of the approximately 22.4-acre parcel for solar and will leave the balance of the site in grassland and a riparian corridor running the length of the northern property boundary. The applicant's submittal materials include suggestions that unimproved areas and spaces between solar panels could be utilized as a pollinator habitat and for limited animal grazing. A Pollinator Habitat Benefits Report from the Pollinator Partnership is included in the application materials but no specific plan on how such a concept would be implemented on the site has been put forward at this time.

As noted above, the project is located within the NVBPSP which includes development standards mandating certain on-site and off-site improvement, including landscaping, access, and site improvements. The NVBPSP permits the Planning Commission to grant Variations to development standards subject to meeting specific required findings. The alternative design proposed with this proposed would not include formal landscaping. As an alternative, the applicant is proposing to retain existing trees located (generally) on the perimeter of the site, and to spread perennial grassland seed over the remainder of the site. Site access will be provided by a 12 ft. gravel driveway which will require minimal improvement to the current farm access road that serves the parcel. This access includes an existing concrete pier bridge over Soscol Creek which will not be modified.

10. Describe the environmental setting and surrounding land uses.

The 22.4-acre property is located on the south side of Suscol Creek south of Soscol Ferry Road. Access to the site is from a private unpaved drive off the access road to Napa Sanitation District's sewage treatment plant intersects with Soscol Ferry Road, approximately ¼ mile west of its intersection with State Route 29, 12, 221. The project site is zoned Industrial Park: Airport Compatibility (IP:AC). Site topography is generally sloping from a high point of 50' asl in the northeast corner to 22' asl in the northwest corner with an ancient river terrace running through the center of the property resulting in a grade break of approximately 2 feet. Slopes range from one to less than five percent with soil types including Clear Lake Clay. Suscol Creek runs along the north property line; however, the access road to the main portion of the property crosses Suscol Creek with an existing 13-foot wide concrete bridge. Sixteen acres of the site are dry farmed grape vines used for wine making purposes. There are several small agricultural outbuildings on the western boundary of the site that are used for equipment and material storage. North of Suscol Creek, extending to Soscol Ferry Road is an 80 ft. wide access corridor, which is part of the subject property. This corridor contains an existing gravel road of varied width, generally about 12 ft., and a row of mature eucalyptus trees run along the western boundary of the corridor. Approximately 200 ft. south of Soscol Ferry Road an ephemeral drainage crosses the 80 ft. corridor within a culvert. Definitional wetlands are present on either end of the culvert.

Surrounding land uses include Napa Sanitation District treated effluent spray fields located to the west of the corridor and main property. These lands are designated as Public Facilities. South of the project site is vacant industrial land. To the east is also vacant industrial land, but the parcel is approved for development of a warehouse building. North of the main portion of the site, and east of the access corridor is vacant industrial land approved for development of a self-storage facility. North of the access corridor, and across Soscol Ferry Road is vacant land owned by Napa Sanitation District, and which borders State Route 29.

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

The project will require various ministerial approvals by the County and Cal Fire, including but not limited to building permits and grading permits.

The project is being referred to the Napa County Airport Land Use Commission because it is located in close proximity to the final approach paths of the primary runway for the Napa County Airport.

The California Department of Fish and Wildlife is a Trustee Agency with oversight of biological resources.

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

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

On August 15, 2019, County Staff sent invitations to consult on the proposed project to three Native American tribes who have a cultural interest in the area and who as of that date had requested to be invited to consult on projects, in accordance with the requirements of Public Resources Code section 21080.3.1. Responses have been received from Middletown Rancheria and the Yocha Dehe Wintun Nation. Middletown Rancheria Tribe declined the offer to consult. Yocha Dehe Wintun Nation requested a site visit, which was conducted on October 21, 2019, and provided written comments on October 28, 2019 following up on the site visit and requesting the project include cultural monitoring during development, and cultural sensitivity training to project personnel.

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

Brian Bordona

Signature

November 15, 2019
Date

Name: Brian Bordona
Napa County
Planning, Building and Environmental Services Department

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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I. **AESTHETICS.** Except as provided in Public Resources Code Section 21099, would the project:

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|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 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) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Discussion:

a-c. Visual resources are those physical features that make up the environment, including landforms, geological features, water, trees and other plants, and elements of the human cultural landscape. A scenic vista, then, would be a publicly accessible vantage point such as a road, park, trail, or scenic overlook from which distant or landscape-scale views of a beautiful or otherwise important assembly of visual resources can be taken-in. Although the proposed project would not result in a substantial adverse effect on a scenic vista and not substantially damage scenic resources, the Project site is located within the designated State Highway 29 scenic corridor. Soscol Ferry Road is not identified as a Scenic Corridor Roadway.

As generally described in the Environmental Setting and Surrounding Land Uses section, above, this area is defined by buffer uses to the industrial park including long-term storage, vacant parcels, underutilized grazing pastures, and the Napa Sanitation facility. The project site is currently developed with a vineyard and associated agricultural buildings and improvements. Up to 168 trees of varying species located in the center of the 22-acre site would be removed along with the existing site improvements; however, significant vegetation associated with Suscol Creek would be retained which would prevent the project site from being prominently visible from State Highway 29. There are no other designated or potential scenic resources on the property. Although the Project is located within the State Highway 29 Scenic Corridor, the project would not result in a substantial damage to scenic resources or substantially degrade the visual character or quality of the site and its surroundings. Furthermore, the County's Viewshed Protection Program is not applicable to the proposed project as no construction is proposed on slopes in excess of 15 percent. Because there is minimal visual impact from public roadways, there is a less than significant impact to a scenic vista or scenic resource.

d. No new lighting is proposed as a component of the proposed solar array project. In order to address potential glare impacts resulting from the solar array installation, the applicant included a Glare Impact Study (July 13, 2019), prepared by Thomas Cleveland, P.E. with an accompanying affidavit validating the expertise related to environmental glare evaluations. The site was evaluated from 34 different points along Soscol Ferry Road, Highway 29 and the Napa County Airport runways to determine possible project glare impacts of the proposed solar arrays. The Glare Impact Study utilized the Solar Glare Hazard Analysis Tool, (SGHAT) created by the Federal Aviation Administration (FAA) and the US Department of Energy's Sandia National Laboratories to analyze solar photovoltaic projects for their potential to create hazardous solar glare. The SGHAT was used to model the potential for the proposed solar array to cause glare for approaching motorists, people at nearby buildings, and pilots and air traffic controllers at Napa County Airport. Given that the closest proposed solar arrays are 800-ft south of Soscol Ferry Road below in elevation from the elevated State Highway 29 roadbed (and behind landscape berms), behind the significant vegetative buffer between Soscol Ferry Road and the site, and that the site is nearly flat (average 2% gradient), there would be no adverse visual/glare impacts to neighboring uses or vehicles as a result of the proposed project. However, the Glare Impact Study also assessed the potential for glare impacts to pilots/planes utilizing the Napa County Airport. The Glare Impact Study considered the fact that the solar arrays have a single-axis pivot point rotation (ie – panels rotate east to west only) and follow the sun throughout the day. This design avoids situations where the sunlight hits the solar panels with a glancing angle, which is the only condition when the glass of a solar panel is very reflective and thus the only condition likely to cause visible glare to an observer. The SGHAT solar glare hazard analysis concluded that the Project will not produce any glare hazards at any intensity at any time during the year at any of the analyzed locations. Because there is minimal visual impact from public roadways and there would no glare or glancing angle sun glare, there is a less than significant impact to day or nighttime views in the area resulting in substantial light or glare and no mitigation is required.

Mitigation Measures: None required

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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II. AGRICULTURE AND FOREST RESOURCES.¹ Would the project:

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|--|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| 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 checked="" type="checkbox"/> | <input 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 checked="" type="checkbox"/> | <input 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 checked="" type="checkbox"/> | <input 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 checked="" type="checkbox"/> | <input type="checkbox"/> |

Discussion:

- a. The majority of project site is designated as Prime Farmland as shown on the 2016 Farmland Mapping and Monitoring Program (FMMP) of the California Resources Agency and the Department of Conservation (DOC), with the boundaries of the Prime Farmland corresponding generally to the existing vineyard, which represents approximately 20 acres. The proposed solar panel field will cover approximately 16 acres of the site but will require removal of the entire vineyard. Conversion of this approximately 20 acre vineyard to non-agricultural use is considered a less-than-significant impact as detailed below.

The vast majority of unincorporated land within Napa County is designated solely for agricultural land use (well over 90% of the total land area). This project site is not located within those agricultural lands, and is instead lies within one of the few areas where urban development is permissible. Since 1968, with the adoption the first-of-its-kind Agricultural Preserve, Napa County has sought to sustain and develop agricultural land uses within the two agricultural zoning districts that comprise most unincorporated lands. Napa County's General Plans (1975, 1984, and 2008) all have expanded policies promoting agricultural as the highest and best use of land for most unincorporated areas. Working with the cities and town of Napa County, the General Plans of all agencies have been aligned, including the establishment of Urban Limit Lines for most communities that seek to protect agriculture by steering urban development to designated urban areas. Most designated urban areas are located within the cities and town, but there are several unincorporated areas (comprising less than 5% of the total land area) where urban development is directed. These urban areas, which are the only areas where urban development is permissible, are a critical component of the overarching plan to protect agriculture.

This project site lies within the unincorporated industrial area of Southern Napa County, that is generally bound by the City of Napa to the north, Napa County Airport and the Napa River to the west, sanitation fields and urban water treatment plants for the Cities of Napa and American Canyon to the east, and the City of American Canyon to the south. This area was designated for urban uses because it is located within an area that is bound by urbanized areas, contains land that is less suitable for vineyard development than areas that have been set aside solely for agriculture, and is situated in an ideal location for the industrial uses needed to support agricultural, such as wine warehousing, bottle operations, cork and enclosure facilities, etc. The majority of existing industrial developments within this unincorporated urban area are support uses related to agricultural and the wine industry.

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

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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Unlike the agriculturally-designated areas, where agricultural is the highest and best use of land, agricultural uses within urbanized areas are allowed, but they are considered holding use until industrial development occurs. That is the case with the vineyard on the subject property, which did not exist at the time this area was initially designated for industrial development in the 1970's. As a holding use, loss of this vineyard within an urbanized area is both expected and considered an acceptable less-than-significant loss of agricultural uses. This determination is made within the context of the overarching General Plan policies that promote agriculture throughout most of Napa County, and direct urban development to designated urban areas to prevent its encroachment within agricultural preserves. With continued new vineyard development within the agricultural areas, Napa County has experienced a net annual increase in Prime, Statewide Important, Unique and Locally Important farmland every year since the adoption of the General Plan. Even with the loss of these 20 acres of vineyard within the industrial park, there will be a net increase in vineyard land overall within the County (see discussion in subsection 'e' below). Therefore, the loss of the vineyard in this location is considered a less-than-significant impact.

- b. There is no Williamson Act contract associated with the project site, there would be no impacts from implementation of the proposed solar energy generation use.
- c-e. The project site is zoned IP:AC, and located within the NVBSP which allows a wide variety of industrial and non-residential urban uses. The proposed solar facility, which is low intensity use with no regular on-site employees, no sewer generation, and nominal water use, is a suitable urban use for the industrial park. According to the Napa County Environmental resource maps (based on the following layers – Sensitive Biotic Grassland, Biotic Oak Woodlands and Riparian Woodland Forest) the area on which the solar panels will be installed contains no sensitive woodland or forested areas, although 168 trees are proposed for removal. Per the application materials, the trees proposed for removal are non-native (and pyro-phytic species), including eucalyptus, Monterey pine, black locust, and a few orchard trees. In addition, the installation of the panels requires minimal site improvements which could allow for ongoing grazing and other agricultural practices not in conflict with the solar arrays. Therefore, the proposed project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. No impacts would occur.
- e. The site and the surrounding parcels were designated by Napa County in the early 1970's for industrial land, and later incorporated into the NVBSP in 1986. The County (through its General Plan process) identified areas that are appropriate for industrial uses in order to take pressure off developing areas that are more appropriate for agricultural uses. Recent data from the DOC identified 75,192 acres of "Important Farmland" (defined as Prime Farmland, Farmland of Statewide & Local Importance and Unique Farmland, but not including Grazing) in 2014 and 75,341 acres of Important Farmland in 2016—an increase of 149 acres. (Dept. of Conservation, "Napa County Important Farmland Data Availability," <https://www.conservation.ca.gov/dlrp/fmmp/Pages/Napa.aspx>) The proposed conversion of Prime Farmland due to the project represents 0.0186% of the County's Important Farmland (proposed 20-acre development site). Due to the industrial designations of the site and surrounding properties, existing soil and groundwater quality, the proposed Project would not be considered a change to Farmland to non-agriculture uses and impacts are considered less than significant with no mitigation required.

Mitigation Measures: None required.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

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|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Conflict with or obstruct implementation of the applicable air quality plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Expose sensitive receptors to substantial pollutant concentrations? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

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

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

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-

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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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. Because the proposed use is not on the list of pollutant generating uses, the project would not significantly impact air quality and does not require further study (BAAQMD CEQA Guidelines, May 2017 Pages 3-2 & 3-3.). Furthermore, given the nature of this use non pollutant generating use once the facility is fully operational, the project will not contribute to 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 may result from the minor earthmoving and construction activities required for project construction related to the new maintenance drive along the northern portion of the solar panel installation. Earthmoving and construction emissions would have a temporary effect; consisting mainly of dust generated during grading and other construction activities and exhaust emissions from construction related equipment and vehicles. 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 are considered less than significant:

7.1 SITE IMPROVEMENTS

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 traced 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 by State Regulations). Clear signage shall be provided for construction workers at all access points.
8. 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/perfact_04-16-15.pdf or the PERP website <http://www.arb.ca.gov/portable/portable.htm>.

Furthermore, while earthmoving and construction on the site would 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 IMPROVEMENTS

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. The passive nature of the solar energy facility will not create pollutants 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. BIOLOGICAL RESOURCES. 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 Wildlife or the U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, Coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion:

A Biological Constraints Analysis was prepared for this property in August 2019 by Garcia & Associates (GANDA). The report concluded that Special-status wildlife species and migratory birds were evaluated for their potential to occur and be affected by the Project. Based on the presence of suitable habitat in the area, three of the 39 special-status wildlife species have the potential to occur in the Project Area: 1) golden eagle (*Aquila chrysaetos*, State fully protected), 2) Swainson's hawk (*Buteo swainsoni*, State threatened), and 3) white-tailed kite (*Elanus leucurus*, State fully protected). Of these three species, Swainson's hawk and white-tailed kite were observed during field surveys. Seventeen special-status plant taxa were evaluated for their potential to occur and be affected by the Project. Of these, none have potential to occur within the Project Area based on absence of suitable habitat. The biological constraint analysis recommends Avoidance and Minimization Measures (AMM) to avoid and minimize impacts to biological resources from the Project.

- a, b. The field survey determined that habitats within the Project Area are only minimally suitable for special-status plants, and therefore special-status plant taxa known from the region are not expected to occur in the Project Area or be impacted by proposed Project activities. No further special-status plant surveys are recommended.

Golden Eagles: Golden eagles were not observed during the July 17, 2019 biological survey of the Project Area. However, the Project Area and surrounding parcels contain numerous large trees that could provide suitable nesting habitat for golden eagles. These large trees are most often associated with wind-breaks between agricultural fields and annual grasslands. Suitable foraging areas around the Project Area include open habitat such as annual grasslands and some of the agricultural areas, specifically those with low ground cover crops like alfalfa, cucumber, pumpkin, and pastureland. Conversion of the Project Area from its current use as a vineyard to solar energy production would not remove existing foraging habitat for the golden eagle. This conversion would result in a manmade cover type that is structurally similar to a vineyard. Rows of solar panels would be similar to elevated grape vines that conceal and provide cover, for small mammals, from raptors such as the golden eagle hunting from the wing. If Project construction occurs during the nesting season (February 1 through August 31), implementation of AMMs such as nesting bird surveys prior to the start of construction is recommended. If necessary, seasonal buffers will be implemented to avoid disturbances to occupied nests. With implementation of these AMMs, direct impacts to golden eagles from Project construction and operation are not anticipated. With the implementation of the Mitigation Measures, direct impacts to Golden eagles would be reduced to less than significant levels

Swainson's Hawk: During the July 17, 2019 biological survey, two adult and two recently fledged Swainson's hawks were present at the Project Area. The adults were observed in flight over, and perched at, various locations along the western border of the Project Area. The two recently fledged young were extremely vocal and remained in close proximity to a nest located in a eucalyptus tree at the northwest corner of the Project Area. The Project Area and surrounding parcels contain numerous large trees that could provide suitable nesting habitat. These large trees are most often associated with wind-breaks between agricultural fields and annual grasslands. Suitable foraging areas around the Project Area include open habitat such as annual grasslands and some of the agricultural areas, specifically those with low ground cover crops like alfalfa, cucumber, pumpkin, and pasture land. With the exception of access roads and unplanted areas, vineyards with grape vines supported 3-6 ft above the ground and arranged in long closely spaced rows do not mirror open foraging habitat, and thus would be unlikely foraging areas for Swainson's hawk.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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Conversion of the Project Area from its current use as a vineyard to solar energy production would not remove existing foraging habitat for Swainson's hawk. This conversion would result in a manmade cover type that is structurally similar to a vineyard. Rows of solar panels would be similar to elevated grape vines that conceal and provide cover for small mammals from raptors, like the Swainson's hawk, hunting on the wing. If Project construction occurs during the nesting season (February 1 through August 31), implementation of AMMs such as nesting bird surveys prior to the start of construction is recommended. If necessary, seasonal buffers will be implemented to avoid disturbances to occupied nests. With the implementation of the Mitigation Measures, direct impacts to Swainson's hawks would be reduced to less than significant levels.

White-tailed Kite: The Project Area is located in suitable nesting and foraging habitat for white-tailed kite. During the July 17, 2019 biological survey, two adult and one recently fledged white-tailed kite were present at the Project Area; a tree located within the Project Area is suspected to be an active white-tailed kite nest. Conversion of the Project Area from its current use as a vineyard to solar energy production would not remove existing foraging habitat for white-tailed kite. This conversion would result in a manmade cover type that is structurally similar to a vineyard. Rows of solar panels would be similar to elevated grape vines that conceal and provide cover for small mammals from raptors such as the white-tailed kite that hunt on the wing. If Project construction occurs during the nesting season (February 1 through August 31), implementation of AMMs such as nesting bird surveys prior to the start of construction is recommended. If necessary, seasonal buffers will be implemented to avoid disturbances to occupied nests. With the implementation of the Mitigation Measures, direct impacts to white-tailed kites are not anticipated. The Project may affect habitat, but Project activities are not likely to affect individuals or lead to a trend towards a loss of viability.

As described in the Mitigation Measures below, a preconstruction nesting bird survey is recommended prior to any Project activities that occur during the nesting season. If necessary, seasonal buffers will be implemented to avoid disturbances to nests. With the implementation of these Mitigation Measures, direct impacts to white-tailed kite are not anticipated. The Project may minimally affect habitat, but Project activities are not likely to affect individuals or lead to a downward population trend for the species.

- c. The Biological Constraints Analysis prepared for this property included protocols for the detection of wetlands and potential impacts of the project's development on adjacent wetland/riparian habitat. The existing access road passes a seasonal wetland occupying 0.11 ac of the Project Area (but outside the subject property). This wetland exhibits drainage-like features characteristic of habitat seasonally influenced by water. Currently, a small 30-inch culvert conveys water from this resource under the existing access road. No impacts to this aquatic feature type are expected as a result of Project construction or operation as no improvements requiring significant excavation are proposed to the existing access road. According to the Napa County Environmental resource maps (based on the following layers – Sensitive Biotic Grassland, US Fish & Wildlife Critical Habitat areas/lines) the subject property is not identified as wetland/riparian habitat. Suscol Creek bisects the Project site, but the proposed Project, including the associated 150-ft setbacks, will not cause a substantial adverse impact during construction or operation, and no impacts are expected to this creek. The Project plans depict 150-ft stream setbacks in accordance with the NVBPSP and no improvements are proposed within setbacks. Impacts would be less than significant, and no mitigation is required.
- d. The Biological Constraints Analysis prepared for this property included protocols for the detection of native or migratory wildlife species and corridors. No evidence of wildlife corridors was observed during the field survey, but active Swainson's hawk and white-tailed kite nests and small rodent (California ground squirrel [*Otospermophilus beecheyi*]) burrows are present. If Project construction occurs during the nesting season (February 1 through August 31), implementation of AMMs such as nesting bird surveys prior to the start of construction will be required. If necessary, seasonal buffers will be implemented to avoid disturbances to occupied nests. With the implementation of the Mitigation Measures, direct impacts to Swainson's hawk and white-tailed kite nests would be less than significant. Furthermore, installation of the solar arrays would not preclude wildlife from moving through the Project site. Impacts would be less than significant, and no mitigation is required.
- e, f. GANDA conducted a tree survey and evaluation in early September 2019 and provided a report in October 2019. A total of 374 trees 6.0 inches DBH or greater were mapped inside the Project Area. Removal is planned for 168 trees. GANDA included an outline of all mapped individuals detailing respective size (DBH), species identification, and resulting prescriptions (preserve/remove) in the October 2019 report. The 168 trees proposed for removal are all considered non-native or pyro-phytic species, including blue gum eucalyptus, Monterey pine, and black locust. Coast live oak and bay laurel identified within the Project will be preserved. GANDA also evaluated the tree canopy for loss of sensitive habitat and concluded that based on the entirety of the vegetation in the Project Area, tree removal would not be a significant impact. As such, the tree removal does not result in the loss of significant wildlife or other sensitive habitat. Implementation of the project does not result in conflict with any County of Napa General Plan policy or ordinance protection vegetation or wildlife. In addition, there are no Habitat Conservation Plans, or other local or state habitat conservation plans that apply to this site. Impacts would be less than significant, and no mitigation is required.

Mitigation Measures:

General Construction Measures

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
BIO-1.				
BIO-2.				
BIO-3.				
BIO-4.				
BIO-5.				
BIO-6.				
BIO-7.				
BIO-8.				

Measures for Special-status Birds

BIO-9. In the event that construction activities occur (e.g., vegetation removal, ground disturbing activities [pile driving, trenching, inverter pad installation, and access road construction], assembly of solar array, other use of heavy equipment, etc.) anytime during the nesting/breeding season of the Swainson's hawk, other raptors, or other bird species listed in the Migratory Bird Treaty Act (typically February 1 through September 30), a qualified biologist (experienced with the nesting behavior of bird species of the region) shall conduct preconstruction surveys for nesting birds. This survey shall be conducted 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

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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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.

Measures for Special-status Plants and Vegetation Communities

BIO-10. If special status plants are found, the Project Manager shall be notified. Individuals shall be marked (e.g., with flagging or construction fencing) and avoided during construction activities. Environmental training for construction personnel will include identification and location of on-site special status plants.

Wetland and Water Feature Measures

- BIO-11. Complete avoidance of Suscol Creek and associated riparian woodland along the northern boundary of the Project shall occur. The minimum 150-foot setback from Suscol Creek shall be demarcated by fencing, flagging, or other highly visible material for the duration of the project.
- BIO-12. Extreme caution shall be exercised when using the access bridge crossing Suscol Creek (Photo 11). When handling and/or storing chemicals (fuel, hydraulic fluid, etc.) near waterways, all applicable laws/regulations and best management practices (BMPs) shall be followed. Appropriate materials will be kept on site to prevent and manage spills. All construction equipment will be well maintained to prevent fuel, lubricants, or other fluid leaks. Equipment, when not in use, will be stored in upland areas outside of the boundaries of the stream-channel or other water bodies.
- BIO-13. Erosion, sediment, and material stockpile BMPs shall be employed between work areas and adjacent wetlands or waterways. No fill or runoff will be allowed to enter wetlands or waterways.
- BIO-14. Any erosion and sediment control materials (e.g., hay bales, straw wattles, erosion blankets, etc.) shall not include micro-filament netting, to avoid entrapment of wildlife. Any straw erosion and sediment control materials will be composed of certified weed free material.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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V. CULTURAL RESOURCES. Would the project:

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|---|--------------------------|-------------------------------------|-------------------------------------|--------------------------|
| a) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines §15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines §15064.5? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Disturb any human remains, including those interred outside of dedicated cemeteries? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion:

- a. According to the Napa County Environmental Resource Maps (based on the following layers – Historical sites & lines) no historic sites have been identified on the property. Structures proposed for removal as a result of the Project include dilapidated agriculture accessory structures with no historical significance. Impacts would be less than significant.
- b. The Project applicant had GANDA conduct a cultural resources evaluation of the site in August 2019, including a site survey on July 18, 2019. Prior to fieldwork, background research included a search of previously conducted cultural resources studies and findings at the Northwest Information Center (NWIC) located at California State University, Sonoma in Rohnert Park, California. The record search included the Project Area, as well as a 0.25-mile radius surrounding it. The results (NWIC File No. 19-0076) found seven cultural resources within the 0.25-mile radius. Five previously cultural resource studies are within the project area, and 25 previous cultural studies have been conducted within the 0.25-mile radius. (*Cultural Resources Inventory Report: Soscol Ferry Solar Project, Napa County*) however no sites were identified within the subject property. The cultural resource inventory of the Project Area included a review of the natural and cultural environment including the prehistory, ethnography, and history; of historic maps; records search results from the NWIC; consultation with the Native American Heritage

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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Commission (NAHC), and a survey of the project area. As a result of these efforts, the study resulted in positive results with the identification of a prehistoric lithic scatter (GANDA-SF-SB-01). Even though the archaeological site is recommended "not eligible for listing" on the CRHR, there is still the potential for the presence of subsurface archaeological deposits. As a result, the Project is considered to be sensitive for cultural resources within the Project and surrounding area. The Project applicant conducted a site visit with representatives of the Yocha Dehe Wintun Nation Tribe on October 21, 2019. As a result of the site visit, implementation of mitigation measures for construction worker education would reduce potential impacts to less than significant levels.

Due to the presence of cultural resources within the project and surrounding area, as described in the Mitigation Measures section below, it is considered to be sensitive for cultural resources, despite the archaeological site being recommended not eligible for listing on the CRHR. With the implementation of the recommended mitigation measures, the Project would result in a less than significant impacts to historical and/or archaeological resources.

- d. No human remains have been encountered on the property and no information has been encountered that would indicate that this project would encounter human remains. Most construction activities would occur on previously disturbed portions of the site (15 of 22 acres of the site used for active agricultural activities). However, as described in the Mitigation Measures section below, if resources are found during project grading, construction of the project is required to cease, and a qualified archaeologist would be retained to investigate the site in accordance with standard condition of approval noted above. Impacts would be less than significant.

Mitigation Measures:

CULT-1: Prior to commencing ground disturbing construction activities within the Project area, the Project sponsor shall require all Project personnel attend a preconstruction training conducted by the Yocha Dehe Wintun Nation Tribe to review potential tribal cultural resources that could be found in the Project Area and ensure that permit conditions for the Project are understood and implemented.

CULT-2: A qualified archaeological monitor and consulting Native American monitor shall be present during all ground-disturbing activity (including but not limited to vegetation clearing/grubbing, piledriving, transformer and inverter pads, trenching, gravel access roads, etc.) for project development. In the event subsurface archaeological materials are encountered, all ground disturbing activities must be suspended within 50-feet of the find. The landowner, project proponent, Napa County Planning Department shall be notified immediately if any such finds until an archaeologist meeting the Secretary of the Interior's (SOI) Professional Qualifications Standards in archaeology can evaluate the finds and recommend appropriate action.

If the resource cannot be avoided, then a data recovery mitigation program shall be developed and implemented. At the discretion the principal archaeologist and in coordination the County, once a sufficient sample of materials has been observed resulting in negative findings, and/or bedrock/paleosols or disturbed soils (i.e. fill) are encountered, monitoring may be reduced to spot-checking or as-needed.

CULT-3: In the event of discovery of human remains the following actions promulgated in Public Resources Code 5097.97 and Health and Human Safety Section 7050.5(b) of the California Health and Safety Code shall apply. Upon identification of human remains all excavation or disturbance of the location must be halted in the vicinity of the find, and the County coroner contacted. If the coroner determines the remains are Native American, the coroner shall contact NAHC, which will identify the most likely descended (MLD) person or persons from the deceased Native American. The MLD will provide recommendations regarding the treatment of the remains with appropriate dignity (refer to PRC 5097.94 for complete guidelines).

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

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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Discussion:

a-b. The Project as proposed is the construction and operation of a renewable solar facility. After construction, there would be no full-time employees associated with the subject property. Furthermore, as discussed in the **Section III Air Quality** of this Initial Study above, Napa County has been working to develop a Climate Action Plan (CAP). 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/>. Energy would be consumed during the operational phase of the project. Once constructed, the facility would not require typical energy consuming infrastructure including but not limited to building heating and cooling, lighting, appliances, and electronics. The proposed facility of renewable energy solar panels is estimated to generate annual electric production of 2 Megawatts (MW) to interconnect to the existing electrical distribution system.

Compliance with the California Building Code and Best Management Practices would further reduce emissions and ensure no overall environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during operation. Therefore, these impacts would be considered less than significant.

Mitigation Measures: None required.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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VII. **GEOLOGY AND SOILS.** Would the project:

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| a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: | | | | |
| i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| ii) Strong seismic ground shaking? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| iii) Seismic-related ground failure, including liquefaction? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| iv) Landslides? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Result in substantial soil erosion or the loss of topsoil? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Be located on expansive soil creating substantial direct or indirect risks to life or property? Expansive soil is defined as soil having an expansive index greater than 20, as determined in accordance with ASTM (American Society of Testing and Materials) D 4829. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input 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 project would result in a less than significant impact with regards to rupturing a known fault.
 - ii.) All areas of the Bay Area are subject to strong seismic ground shaking. Construction of the project would be required to comply with the latest building standards and codes, including the California Building Code that would reduce any potential impacts to a less than significant level.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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- iii.) No subsurface conditions have been identified on the project site that indicated a susceptibility to seismic-related ground failure or liquefaction. Compliance with the latest edition of the California Building Code for seismic stability would result in less than significant impacts.
- iv.) According to the Napa County Environmental Resource Maps (Landslides line, polygon, and geology layers) there are no known landslide areas within the area of the subject site proposed for modification as part of the project.

- b. The proposed improvements would occur on slopes of less than five percent. The project would require incorporation of best management practices and would be subject to the Napa County Stormwater Ordinance which addresses sediment and erosion control measures and dust control, as applicable. Impacts would be less than significant.
- c/d. Based on the Napa County Environmental Sensitivity Maps (liquefaction layer) the improvements are proposed for an area which has a very low susceptibility for liquefaction. Construction of the project would be required to comply with the latest building standards and codes, including the California Building Code that would reduce any potential impacts to a less than significant level.
- e. No wastewater will be generated by the proposed project. There would be no impact.
- f. As discussed in **Section VII(a)(ii)** above, the proposed Project shall comply with the latest building standards and codes, including the California Building Code. The final building permit plan set shall be submitted to the City Engineer for review and approval. However, paleontological resources could be encountered when excavation occurs in previously undisturbed soil and bedrock.

The implementation of the following Mitigation Measure GEO-1, which requires that excavation activities be halted should a paleontological resource be encountered and the curation of any substantial find, would reduce this impact to a less-than significant level.

Mitigation Measures:

GEO-1: Should paleontological resources be encountered during project subsurface construction activities located in previously undisturbed soil and bedrock, all ground-disturbing activities within 25 feet shall be halted and a qualified paleontologist contacted to assess the situation, consult with agencies as appropriate, and make recommendations for the treatment of the discovery. For purposes of this mitigation, a "qualified paleontologist" shall be an individual with the following qualifications: 1) a graduate degree in paleontology or geology and/or a person with a demonstrated publication record in peer-reviewed paleontological journals; 2) at least two years of professional experience related to paleontology; 3) proficiency in recognizing fossils in the field and determining their significance; 4) expertise in local geology, stratigraphy, and biostratigraphy; and 5) experience collecting vertebrate fossils in the field.

If the paleontological resources are found to be significant and project activities cannot avoid them, measures shall be implemented to ensure that the project does not cause a substantial adverse change in the significance of the paleontological resource. Measures may include monitoring, recording the fossil locality, data recovery and analysis, a final report, and accessioning the fossil material and technical report to a paleontological repository. Upon completion of the assessment, a report documenting methods, findings, and recommendations shall be prepared and submitted to the County for review. If paleontological materials are recovered, this report also shall be submitted to a paleontological repository such as the University of California Museum of Paleontology, along with significant paleontological materials. Public educational outreach may also be appropriate.

The Project sponsor shall inform its contractor(s) of the sensitivity of the project site for paleontological resources and shall verify that the following directive has been included in the appropriate contract specification documents:

"The subsurface of the construction site may contain fossils. If fossils are encountered during project subsurface construction, all ground-disturbing activities within 25 feet shall be halted and a qualified paleontologist contacted to assess the situation, consult with agencies as appropriate, and make recommendations for the treatment of the discovery. Project personnel shall not collect or move any paleontological materials. Fossils can include plants and animals, and such trace fossil evidence of past life as tracks or plant imprints. Marine sediments may contain invertebrate fossils such as snails, clam and oyster shells, sponges, and protozoa; and vertebrate fossils such as fish, whale, and sea lion bones. Vertebrate land mammals may include bones of mammoth, camel, saber tooth cat, horse, and bison. Contractor acknowledges and understands that excavation or removal of paleontological material is prohibited by law and constitutes a misdemeanor under California Public Resources Code, Section 5097.5."

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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VIII. GREENHOUSE GAS EMISSIONS. Would the project:

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

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

In 2011, the Bay Area Air Quality Management District (BAAQMD) released California Environmental Quality Act (CEQA) Project Screening Criteria and Significance of Thresholds [1,100 metric tons per year (MT) of carbon dioxide and carbon dioxide equivalents (CO₂e)]. This threshold of significance is appropriate for evaluating projects in Napa County.

During 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.)

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

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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One time "Construction Emissions" associated with development project include: i) the carbon stocks that are lost (or released) when existing vegetation is removed in preparation for a new structure 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 any existing vegetation that is proposed to be removed. As previously stated, this project includes installation of solar arrays as well as the construction of a new maintenance road adjacent to the northerly edge of the solar field.

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 project, including vehicle trips associated with employees. See Section XVI, Transportation/Traffic, for anticipated number of operational trips. Construction Emissions from the proposed solar project would be the primary source of emissions given that over the long-term omissions from a passive solar array are insignificant. Additionally, the number of vehicle trips accessing the site will substantially reduce give the removal of the single-family home and active agricultural activities, to be replaced with the solar field that needs maintenance activities at roughly 1 vehicle trip per month upon completing the installation.

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. Given the passive nature of solar arrays, regardless of size and scope, the project will not to exceed the 1,100 MT of CO2e/yr GHG threshold of significance.

As discussed above, the proposed project would not exceed the 1,100 MT/yr of CO2e as the only emissions generating aspect of the use would be maintenance vehicle trips; substantially fewer trips than agricultural uses.

Mitigation Measures: None required.

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
IX.	HAZARDS AND HAZARDOUS MATERIALS. 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 type="checkbox"/>	<input checked="" type="checkbox"/>
	b) Create a significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wild-land fires, including where wild-lands?	<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
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Discussion:

- a. The proposed project would not involve the transport of hazardous materials. No impacts would occur.
- b. Hazardous materials such as diesel, maintenance fluids, and paints would be used onsite during construction. Should they be stored onsite, these materials would be stored in secure locations to reduce the potential for upset or accident conditions. The proposed project consists of installation of solar arrays which would not be expected to use any substantial quantities of hazardous materials. Therefore, it would not be reasonably foreseeable for the proposed project to create upset or accident conditions that involve the release of hazardous materials into the environments. No impact would occur.
- c. There are no schools located within one-quarter mile from the Project site. According to Google Earth, the nearest school to the project site is Pacific Union College, Napa Campus, located approximately 1.25 miles to the north. No impacts would occur.
- d. Based on a search of the California Department of Toxic Substances Control database, the project site does not contain any known EPA National Priority List sites, State response sites, voluntary cleanup sites, or any school cleanup sites. No impact would occur as the project site is not on any known list of hazardous materials sites.
- e. The project site is approximately one mile north 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 (ALUCP). The project site is located within compatibility Zones C and D of the Napa County Airport, which is an Extended Approach/Departure Zone: This zone is defined as the area where aircraft will be below 300 feet above ground level as determined by the type of approach. The low altitude of aircraft in these areas indicates moderate to high risk of accident potential. Properties in this zone will be affected by substantial noise. As such, persons on the project site will be exposed to noise from the regular aircraft overflight, however, the passive nature of the proposed project would not require on-site employees on a daily basis.

The project is being referred to the Airport Land Use Commission for a consistency determination with the safety requirements of the ALUCP. The project site is located under the approach path of main runway for the Napa County Airport, and is in a sensitive location for pilot/aircraft safety. Solar panels have some potential to result in glare which could be a hazard if glare occurs within the cockpit. ALUCP Policy 3.3.5 prohibits any uses which may produce hazards to aircraft in flight. Therefore, to assist in the County and ALUC's review of the project, and glare analysis which is attached and incorporated herein, and titled *Glare Impact Study of Soscol Ferry Solar Facility, Thomas Cleveland, PE..* The study concludes that there is no potential for any glare at any time based on the modeling software used to conduct the analysis. The software was developed by the Federal Aviation Administration (FAA) and US Department of Energy's Sandia National Laboratories and is called Solar Glare Hazard Analysis Tool (SGHAT).

FAA approval is required for any solar project located on a federally-funding airport, and the SGHAT software must be used to evaluate the impact. In this case, FAA review and approval of the solar facility and the modeling is not required because the FAA permitting process for solar facilities only applies on federally-funded airports. Therefore, it is the local agency's responsibility to evaluate the facility. FAA technical guidelines note that the SGHAT software has limitations (*Solar Glare Hazard Analysis Tool (SGHAT) Technical Reference Manual, SAND2014-18360 O, Sandia National Laboratories, 2014*), and FAA guidelines (*Technical Guidance for Evaluating Selected Solar Technologies on Airports, FAA, Version 1.1 April 2018*) that are applied to on-airport installations recommend that solar panels include the application of antireflective coatings and/or texturing to the panels to limit and/or diffuse glare. Neither has discernable effects on system performance but could help minimize reflection. The project will be conditioned to utilize antireflective solar panel coating.

- f. The proposed project has been reviewed by the Napa County PBES Engineering and Public Works departments. Per the NVBPSP, the proposed Project is required to make frontage improvements consistent with the required development standards, however, the Project applicant is requesting a Variation from those NVBPSP standards. The Project has been reviewed by the Engineering and Fire Division and staff support Napa County Road and Street Standards for the existing access and driveway and findings for a Variation can be approved. Therefore, the project would not obstruct emergency vehicle access. The project has been reviewed by the County Fire Department and Engineering Services Division and found acceptable, as conditioned.
- g. The project would not increase exposure of people and/or structures to a significant loss, injury or death involving wild land fires. The project would comply with current California Department of Forestry and California Building Code requirements for fire safety. No impacts would occur.

Mitigation Measures: None required.

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

Discussion:

a/b/c. The project would not violate any water quality standards or waste discharge requirements nor substantially deplete local groundwater supplies as, other than intermittent washing maintenance of the solar arrays, the passive solar use does not demand water resources on a regular basis. Projects within the industrial park that create water and sewer demand are required to connect to the municipal services provided to the industrial park. In this case, the project has no demand for potable water or sewage treatment, and therefore will not connect to the systems. Intermittent washing of solar panels, which would typically occur in summer after dust accumulation has occurred (similar to dust accumulation on a motor vehicle or on windows for building), would truck in recycled water which is available from Napa Sanitation District which is located within a half mile of the project site. The project would not substantially alter the drainage pattern on site or cause a significant increase in erosion or siltation on or off the project site. The minimal improvements necessary for installation of the solar arrays on this site will not require substantial grading or site disturbance. Impacts would be less than significant. The preliminary grading and drainage plan has been reviewed by the Engineering Division. As conditioned, impacts would be less than significant.

d. The parcel is not located in an area that is subject to inundation by tsunamis, seiches, or mudflows. No impacts would occur.

e. The proposed solar array would not substantially alter the site conditions such that a water quality control plan would be obstructed as a result. The operation of the facility would not require groundwater for on-site usage and therefore will not obstruct implementation of a water quality control plan or substantial groundwater management plan. No impacts would occur.

Mitigation Measures: None required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
XI. LAND USE AND PLANNING. Would the project:				

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

Discussion:

- a. The proposed project is located within the Napa Valley Industrial Park would not occur within an established community, nor would it result in the division of an established community.
- b. The proposed project is located within the AIASP and has a land use designation of IP:AC (Industrial Park: Airport Compatibility). The project complies with the Napa County Code and all other applicable regulations. Mitigation measures BIO-1 through BIO-15, discussed under the “Biological Resources” section above, are intended to address any potential biological impacts from the proposed project and are precautionary in nature. The subject parcel is located in the IP:AC (Industrial Park – Airport Compatibility) zoning district, which allows solar array project such as the proposed project subject to use permit approval. The proposed project is compliant with the physical limitations of the Napa County Zoning Ordinance.

The project complies with the Napa County Code and all other applicable regulations, provided that a Variation to development standards is granted by the Planning Commission upon meeting certain code-specified findings. The proposed project complies with the Napa County General Plan, the Napa County Zoning Ordinance, applicable County Code sections, the NVBPSP, and all other applicable regulations, provided that a Variation is granted as noted above. There are no habitat conservation plans or natural community conservation plans applicable to the property. Therefore, the project results in no impact.

There are no applicable habitat conservation plans or natural community conservation plans applicable to the property. No impacts would occur.

Mitigation Measures: None required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES. 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"/>
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 the project site. No impacts would occur.

Mitigation Measures: None required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
XIII. NOISE. Would the project result in:				

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

Discussion:

a/b. The project would result in a temporary increase in noise levels during installation of the proposed site improvements and solar arrays. Construction activities would be limited to daylight hours using properly muffled vehicles. Noise generated during this time is not anticipated to be significant. As such, the project would not result in potentially significant temporary construction noise impacts or operational impacts. Although the movement of the ground-mounted arrays will generate noise in order to track the sun for maximum energy collection, the noise generated by the panel movement is roughly 35 decibels, well below the 45 decibel maximum noise limitations for daytime noise in this location, and well below the 70-75 decibel existing ambient noise environment, as measured by the County of Napa General Plan Final EIR. This ambient noise environment is a result of proximity to the Napa Airport and Highway 29. In addition, the panels do not move during nighttime hours, therefore no noise is generated during the most sensitive noise period of a 24-hour day. As such, the proposed project would not result in long-term significant construction noise impacts. Conditions of approval identified below would require construction activities to be limited to daylight hours, vehicles to be muffled, and backup alarms adjusted to the lowest allowable levels. Impacts would be less than significant.

7.3. CONSTRUCTION NOISE

Construction noise shall be minimized to the greatest extent practical and feasible under State and local safety laws, consistent with construction noise levels permitted by the General Plan Community Character Element and the County Noise Ordinance. Construction equipment muffling and hours of operation shall be in compliance with the County Code. Equipment shall be shut down when not in use. Construction equipment shall normally be staged, loaded, and unloaded on the project site, if at all practicable. If project terrain or access road conditions require construction equipment to be staged, loaded, or unloaded off the project site (such as on a neighboring road or at the base of a hill), such activities shall only occur daily between the hours of 8 am to 5 pm.

c. The proposed project site is located within compatibility Zones C and D for the Napa County Airport, which is an Extended Approach/Departure Zone: This zone is defined as the area where aircraft will be below 300 feet above ground level as determined by the type of approach. The low altitude of aircraft in these areas indicates moderate to high risk of accident potential. Properties in this zone will be affected by substantial noise. As such, persons on the project site will be exposed to noise from the regular aircraft overflight, however, the passive nature of the proposed project would not require on-site employees on a daily basis. The Napa County Zoning Code, section 8.16.070, Exterior noise levels, 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 projects of 60 dBA or less, which is less than the maximum allowed in the Industrial 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. Therefore, the location of the project within the airport land use area will result in a less than significant impact on people working in the project area.

Mitigation Measures: None required.

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

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

a.,b.,c. This passive solar energy use would not induce population growth, displace a substantial volume of existing housing or a substantial number of people and would not necessitate the construction of replacement housing elsewhere. No impacts would occur.

Mitigation Measures: None required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
XV. PUBLIC SERVICES. 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:				
i) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
v) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

a. Public services are currently provided to the project area and the additional demand placed on existing services as a result of the proposed project would be minimal. The Napa County Fire Department and Engineering Services Division have reviewed the application and provided comments for approval, as conditioned. School impact fees, which assist local school districts with capacity building measures, would be levied pursuant to building permit submittal. The proposed project would have minimal impact on public parks as no residences are proposed. No impacts to public services occur.

Mitigation Measures: None required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
XVI. RECREATION. 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"/>

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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. The project would not significantly increase use of existing parks or recreational facilities based on its limited scope. No impacts would occur.
- b. No recreational facilities are proposed as part of the project. No impact would occur.

Mitigation Measures: None Required

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
XVII. TRANSPORTATION. 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-38, 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 type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a geometric design feature, (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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"/>

Discussion:

- a. The passive nature of the solar field will result in a net reduction traffic generated to/from the site over existing conditions. The existing vineyard generates a nominal amount of traffic, generally less than one trip per day on average. The proposed solar facility will generate no traffic on most days, and the only traffic will occur from periodic maintenance of the panels is expected to generate less trips per day than any typical land use including single-family residences and/or agriculture uses. No impact would occur.
- b. The passive nature of the solar field will result in no new traffic generated to or from the site therefore there would be no conflict with a congestion management program or an adopted transit or other transportation plans. No impact would occur.
- c. The passive nature of the solar field will result in no significant traffic generated to the site. Periodic maintenance of the panels may require trips on specific intervals. As a result, the Project would not reach a threshold where CEQA Guidelines section 15064.3, subdivision (b) would need to be considered. No impacts would occur.
- d. The proposed project will utilize existing access roads and infrastructure on site. The Project application has requested a Variation from AIASP development standards requiring improvements to road frontages. As such, there are no new circulation or access improvements, and none that would pose a hazard. No impact would occur.
- e. The project has been reviewed by Napa County Fire and no significant concerns have been identified as a result of installation of the project. Therefore, there would be no impact to hazards due to a geometric design feature or inadequate emergency access, or incompatible uses, and no mitigation is required.
- f. There is no need for installation of parking for the project use. No impact would occur.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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Mitigation Measures: None Required

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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XVIII. TRIBAL CULTURAL RESOURCES. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- | | | | | |
|--|--------------------------|-------------------------------------|-------------------------------------|--------------------------|
| a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k); or | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion:

a-b. According to the Napa County Environmental Resource Maps (based on the following layers – Historical sites points & lines, Archaeology surveys, sites, sensitive areas, and flags) no historic sites or tribal resources have been identified on the property. Invitation for tribal consultation was completed in accordance with Public Resources Code Section 21080.3.1. On August 15, 2019, County Staff sent invitations to consult on the proposed project to Native American tribes who had a cultural interest in the area and who as of that date had requested to be invited to consult on projects, in accordance with the requirements of Public Resources Code section 21080.3.1. One response was received on September 9, 2019 from the Yocha Dehe Wintun Nation requesting a site visit and copy of the cultural resource study and historical resources study and a site visit was conducted on October 21, 2019. Yocha Dehe submitted a follow up response letter on October 28, 2019 which requested cultural monitoring and sensitivity training, as has been addressed in the mitigation measures in in **Section V: Cultural Resources** and **Section VII: Geology and Soils**.. Mitigation Measure CULT-1 was included to educate construction workers prior to construction activities. As discussed in **Section V** of this initial study, there is some evidence of potential resources on the subject property, including potential cultural resources found on the site. As such if any resources not previously uncovered during this prior disturbance are found during any earth disturbing activities associated with the proposed project, construction of the project is required to cease, and a qualified archaeologist must be retained to investigate the site in accordance with the standard county conditions of approval. 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, CULT-2, CULT-3 and GEO-1, as noted above in **Section V: Cultural Resources** and **Section VII: Geology and Soils**.

Mitigation Measures: Implementation of CULT-1, CULT-2, CULT-3 and GEO-1 above.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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XIX. UTILITIES AND SERVICE SYSTEMS. Would the project:

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Require or result in the relocation or construction of a new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

- a/b. Given that no wastewater will be generated by the proposed passive solar project, the project would not exceed wastewater treatment requirements of the Regional Water Quality Control Board and would not result in a significant impact on the environment relative to wastewater discharge.
- c. The passive nature of the solar field will result in no new or increased water for the site. The solar panels will require periodical washing to clean surfaces, however, water would be trucked onto the site for routine maintenance activities. No impact would occur.
- d. The project would be served by Keller Canyon Landfill which has a capacity which exceeds current demand. As of January 2004, the Keller Canyon Landfill had 64.8 million cubic yards of remaining capacity and has enough permitted capacity to receive solid waste through 2030. No impacts will occur.
- e. The project would comply with federal, state, and local statutes and regulations related to solid waste. Therefore, no impacts would occur.

Mitigation Measures: None Required.

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

Discussion:

- a-d. Although the subject property is currently developed with vineyards, the project site is located within the NVBPS which is predominately industrial development. It is also located in the Napa County Local Responsibility Area (LRA) and the fire hazard severity zone is classified as Urban Unzoned. The project would not increase exposure of people and/or structures to a significant loss, injury or death involving wildland fires. The project has been reviewed by the Napa County PBES Engineering Department for compliance with road and access standards and there are no project features that would impair an adopted emergency response plan or evacuation plan. The project would comply with current California Department of Forestry and California Building Code requirements for fire safety. The project site is currently served by overhead utilities for power but would not require significant infrastructure installation or maintenance to existing infrastructure as a result of the proposed project. The proposed Project includes new on-site overhead delivery lines from the solar arrays to the main overhead distribution lines at Soscol Ferry Road but would be subject to Napa County PBES Engineering and Fire Department for new development, including distance and clearance from existing vegetation. Therefore, impacts would be considered less than significant,

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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and no mitigation is required.

Mitigation Measures: None Required.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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XXI. MANDATORY FINDINGS OF SIGNIFICANCE

- | | | | | | |
|----|---|--------------------------|-------------------------------------|-------------------------------------|--------------------------|
| a) | Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) | Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) | Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Discussion:

- a. The site is designated as industrial land in the Napa General Plan and AIASP, has been previously disturbed, and does not contain any known listed plant special-status species. The project will not degrade the quality of the environmental, 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. Three special status bird species were either observed or have potential to occur on the Project site. Potential biological impacts related to special status bird species would be reduced to less than significant levels through implementation of AMAs (by constructing the project outside of applicable nesting seasons), or through implementation of Mitigation Measures BIO-1 through BIO-15 if construction occurs during identified nesting season as stated in **Section IV: Biological Resources** above. There is potential for historic or prehistoric resources to occur on site and Project construction activities could disturb previously unknown resources as a result of the Project. As stated in **Section V: Cultural Resources** and **Section VII: Geology and Soils** above, in the event archaeological artifacts are found, **Mitigation Measures CULT-1, CULT-2, CULT-3, and GEO-1** would reduce potential impacts to less than significant levels which would be incorporated into the project. Therefore, impacts would be considered less than significant with mitigation incorporation.
- b. The project does not have impacts that are individually limited but cumulatively considerable. Potential air quality, greenhouse gas emissions, hydrology and traffic associated impacts are discussed in their respective sections above. The analysis determined that all potential impacts were less than significant and would not contribute significantly to cumulative impacts. The proposed project is consistent with previous Use Permit modification approvals from Napa County and 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, or 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.