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FINAL
Environmental Impact Report
Napa Airport Corporate Center Project
City of American Canyon, Napa County, California

State Clearinghouse No. 2014122005

Prepared for:

City of American Canyon
4381 Broadway Street, Suite 201
American Canyon, CA 94503

Contact: Colette Meunier, Consulting Project Planner
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Grant Gruber, Project Manager

Date: April 13, 2018

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Table of Contents

List of Exhibits

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SECTION 1: INTRODUCTION

In accordance with the California Environmental Quality Act (CEQA) Guidelines Section 15088, the City of American Canyon has evaluated the comments received on the Napa Airport Corporate Center Project Draft Environmental Impact Report (EIR). The responses to the comments and errata, which are included in this document, together with the Draft EIR and the Mitigation Monitoring and Reporting Program, form the Final EIR for use by the City of American Canyon in its review.

This document is organized into four sections:

- **Section 1—Introduction.**
- **Section 2—Responses to Written Comments.** Provides a list of the public agencies and private businesses, individuals, and organizations that commented on the Draft EIR. Copies of all of the letters received regarding the Draft EIR and responses thereto are included in this section.
- **Section 3—Responses to Planning Commission Comments.** Provides a list of the individuals who provided verbal comments on the Draft EIR at the July 28, 2016 Planning Commission Meeting.
- **Section 4—Errata.** Includes an addendum listing refinements and clarifications on the Draft EIR, which have been incorporated.

The Final EIR includes the following contents:

- Draft EIR (provided under separate cover)
- Draft EIR appendices (provided under separate cover)
- Responses to Written Comments on the Draft EIR, Responses to Planning Commission Comments, and Errata (Sections 2, 3, and 4 of this document)
- Mitigation Monitoring and Reporting Program (provided under separate cover)

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SECTION 2: RESPONSES TO WRITTEN COMMENTS

2.1 - List of Authors

A list of public agencies, organizations, and individuals that provided comments on the Draft EIR is presented below. Each comment has been assigned a code. Individual comments within each communication have been numbered so comments can be crossed-referenced with responses. Following this list, the text of the communication is reprinted and followed by the corresponding response.

Commenting Party **Code**

State Agencies

California Department of Transportation ..... CALTRANS
California Department of Fish and Wildlife ..... CDFW

Local Agency

Napa Valley Transportation Authority NVTA.1
Napa Valley Transportation Authority NVTA.2

Tribal Government

Yocha Dehe Wintun Nation ..... YD

Private Business

Orchard Partners, LLC ..... ORCHARD

2.2 - Responses to Comments

2.2.1 - Introduction

In accordance with the California Environmental Quality Act (CEQA) Guidelines Section 15088, the City of American Canyon, as the lead agency, evaluated the comments received on the Draft EIR (State Clearinghouse No. 2014122005) for the Napa Airport Corporate Center project, and has prepared the following responses to the comments received. This Response to Comments document becomes part of the Final EIR for the project in accordance with CEQA Guidelines Section 15132.

2.2.2 - Comment Letters and Responses

The comment letters reproduced in the following pages follow the same organization as used in the List of Authors.

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DEPARTMENT OF TRANSPORTATION
DISTRICT 4
P.O. BOX 23660
OAKLAND, CA 94623-0660
PHONE (510) 286-5528
FAX (510) 286-5559
TTY 711
www.dot.ca.gov

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August 15, 2016

04-NAP-2016-00004
NAP/29/PM 3.61
SCH# 2014122005

Ms. Colette Meunier
Community Development Department
City of American Canyon
4381 Broadway Street
American Canyon, CA 94503

Dear Ms. Meunier:

Napa Airport Corporate Center – Draft Environmental Impact Report

Thank you for continuing to include the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced project. In tandem with the Metropolitan Transportation Commission's (MTC) Sustainable Communities Strategy (SCS), Caltrans new mission signals a modernization of our approach to evaluating and mitigating impacts to the State Transportation Network (STN). We aim to reduce vehicle miles traveled (VMT) by tripling bicycle and doubling both pedestrian and transit travel by 2020. Our comments are based on the Draft Environmental Impact Report (DEIR). Please also refer to the previous comment letters on this project and incorporated herein. Additional comments may be forthcoming. 1

Project Understanding

The proposed project is located adjacent to State Route (SR) 29 on the west side at the S. Kelly Road intersection. The applicant is proposing to amend the previous entitlements (with the exception of Building D; 90,799 square feet) and develop five buildings (A, B, E, G, and H) on five lots (1, 2, 4, 5, and 6) totaling a maximum of 571,808 square feet. At least 50 percent of the square footage would be for wine warehousing and up to 50 percent may be for general warehousing. There is also a separate application on file by Norcal Foods II in which Building A on Lot 1 is replaced with a gas station/truck refueling facility/quick-serve restaurant/convenience mart totaling 6,688 square feet. Under this application, total project square footage would be a maximum 554,099 square feet. 2

Lead Agency

As the lead agency, the City of American Canyon (City) is responsible for all project mitigation, including any needed improvements to the STN. The project's fair share contribution, financing, 3

scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures. 3 CONT

Traffic Impacts

The project is of regional and areawide significance, as it has the potential for causing significant traffic effects extending beyond the City. Please provide the complete Traffic Impact Study (TIS) for our review. Appendix I TIA is only data and turning diagrams. The DEIR should include an analysis of the travel demand expected from the proposed project. Caltrans recommends using the Caltrans *Guide for the Preparation of Traffic Impact Studies* for determining which scenarios and methodologies to use in the analysis, available at: www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf. 4

Please ensure that the TIS is prepared providing the information detailed below:

1. A vicinity map, regional location map, and site plan clearly showing project access in relation to nearby State roadways. Ingress and egress for all project components should be clearly identified. Clearly identify the State right-of-way (ROW). Project driveways, local roads and intersections, car/bike parking, and transit facilities should be mapped. 5

2. Project-related trip generation, distribution, and assignment including per capita use of transit, rideshare or active transportation modes such as existing and new bus service and VMT reduction factors. The assumptions and methodologies used to develop this information should be detailed in the study and utilize the latest place-based research. A trip generation table regarding existing demolition and new construction should be included in the TIA. Also, please clearly describe any traffic credit calculation. 6

3. Turning movement traffic per study intersection under Existing, Project Only, Existing + Project, Background, 2035 Cumulative, 2035 Cumulative + Project Conditions. 7

4. The project site's building potential as identified in the General Plan. The project must be consistent with the Circulation Element of the General Plan, the Congestion Management Agency's Congestion Management Plan, and the MTC's Regional Transportation Plan (RTP)/SCS. 8

5. A schematic illustration of walking, biking and auto conditions at the project site and study area roadways, trip distribution percentages and volumes, and intersection geometrics. Potential safety issues for all road users should be identified and fully mitigated. 9

6. Mitigation for increasing VMT should be identified. Mitigation should support the use of transit and active transportation modes. Potential mitigation measures that include the requirements of other agencies such as Caltrans are fully enforceable through permit conditions, agreements, or other legally-binding instruments under the control of the City. 10

    - Mitigation Measure MM TRANS-1d states that "Prior to insurance of the first certificate of occupancy for the proposed project, the Applicant shall construct 11

the following improvements along South Kelly Road, or, at the sole discretion of the City, enter into an off-site improvements agreement and prove an acceptable financial guarantee ensuring that these improvement will be completed: (1)…., (2)…., (3)…." Caltrans requires that MM TRANS 1d (1) be completed prior to insurance of the first certificate of occupancy for the proposed project. The option "at the sole discretion of the City, enter into an off-site improvement agreement and prove an acceptable financial guarantee ensuring that these improvements will be completed" is not applicable and must be removed from MM TRANS-1d (1). 11 CONT

- MM TRANS-1d (1) should be revised to include the limits of the 3rd through lane in both directions of SR 29. MM TRANS-1d (1) states that at the intersection of SR 29 and South Kelly Road, three through lanes shall be provided in both northbound and southbound approaches. However, MM TRANS-1d (1) fails to provide the limits of the 3rd through lane in each direction. 12

7. The project's primary and secondary effects on pedestrians, bicycles, disabled travelers and transit performance should be evaluated, including countermeasures and trade-offs resulting from mitigating VMT increases. Access to pedestrians, bicycle, and transit facilities must be maintained. 13

8. Existing plus Project with mitigation measures and Cumulative plus Project with mitigation measures:

   - The lane configurations for Existing plus Project with mitigation measures and Cumulative plus Project with mitigation measures are missing from the turning diagram exhibits. Please include these lane configurations. 14

   - The intersection level-of-service (LOS) for Existing plus Project with mitigation measures and Cumulative plus Project with mitigation measures are missing from the intersection LOS tables. Please include these LOSs. 15

9. Please analyze queue lengths and queuing impacts under the various scenarios. The DEIR (p. 3.11-11) indicates that the SR 29 northbound and southbound queues extend into the upstream intersections under existing conditions. Consequently, the queue lengths would also increase in various scenarios and must be analyzed. 16

10. The lane configurations in Exhibits 3.11-2, 3-11.7, 3-11-9, 3-11-10, 3-11-11, and 3-11-13 appear incorrect for the Donaldson Way westbound approach. The lane configurations should show one mandatory left-turn lane, one mandatory through lane, and one mandatory right-turn lane. 17

11. Please consult with Caltrans District 4 Office of Design regarding the timelines for construction of the improvements mentioned in the Planned Transportation Network Changes section. The assertion on page 3.11-19 may not be accurate stating, "There is currently no 18

timeline for construction of many of these improvements...none have been assumed in this analysis, as most could not be documented to be approved and funded." 18 CONT

12. Addition to trips generated by the proposed project, the background development projects were listed in page 3.11-53 Table 3.11-9 also generate more than 1,200 trips in AM peak hours and about same number of trips in PM peak hour. Transportation Demand Management as proposed in Napa Logistics Park Project should be in place to mitigate traffic impacts on SR-29. 19

13. Please clarify why identical lane configurations are shown in in the exhibits for various scenarios, as the DEIR includes improvements proposed from various background projects as shown in Table 3.11-9 (p. 3.11-53). 20

14. Please include all study intersection results from Synchro in the TIS. 21

Vehicle Trip Reduction

Transportation Demand Management (TDM) programs should be documented with annual monitoring reports by an onsite TDM coordinator to demonstrate effectiveness. Suggested TDM strategies include decrease headway times and improve way-finding on bus lines to provide a better connection between the project and regional destinations and providing:

- Membership in a transportation management association.
- Transit subsidies and/or transit passes to all employees.
- Ten percent vehicle parking reduction.
- Transit and trip planning resources.
- Carpool and vanpool ride-matching support. 22
- Carpool and clean-fuel parking spaces.
- Secured bicycle storage facilities.
- Bicycles for employee uses to access nearby destinations.
- Showers, changing rooms and clothing lockers.
- Fix-it bicycle repair station(s).
- Emergency Ride Home program.
- Bicycle route mapping resources and bicycle parking incentives.

These smart growth approaches are consistent with the MTC's RTP/SCS goals and would meet Caltrans Strategic Management Plan. Please refer to "Reforming Parking Policies to Support Smart Growth," a MTC study funded by Caltrans, for sample parking ratios and strategies that support compact growth. Reducing parking supply can encourage active forms of transportation, reduce regional VMT, and lessen future traffic impacts on SR 29 and the STN.

Traffic Impact Fees

Given the project's contribution to area traffic and its proximity to SR 29, the project should contribute fair share traffic impact fees. These contributions would be used to lessen future traffic congestion and improve transit in the project vicinity. 23

Traffic Control Plan

A Caltrans-approved Traffic Control Plan (TCP) is required to avoid project-related impacts to the STN, if it is anticipated that vehicular, bicycle, and pedestrian traffic will be impacted during the construction of the proposed project requiring traffic restrictions and detours. The TCP must also comply with the requirements of corresponding jurisdictions. In addition, pedestrian access through the construction zone must be in accordance with the Americans with Disabilities Act (ADA) regulations (see Caltrans' *Temporary Pedestrian Facilities Handbook* for maintaining pedestrian access and meeting ADA requirements during construction at: www.dot.ca.gov/hq/construc/safety/Temporary_Pedestrian_Facilities_Handbook.pdf) (see also Caltrans' Traffic Operations Policy Directive 11-01 "Accommodating Bicyclists in Temporary Traffic Control Zones" at: www.dot.ca.gov/hq/traffops/policy/11-01.pdf). All curb ramps and pedestrian facilities located within the limits of the project are required to be brought up to current ADA standards as part of this project. 24

For further TCP assistance, please contact the Caltrans District 4 Office of Traffic Management Operations at (510) 286-4579. Further traffic management information is available at the following website: www.dot.ca.gov/hq/traffops/trafmgmt/tmp_lcs/index.htm.

Encroachment Permit

Please be advised that any work, staging, or traffic control that encroaches onto the State ROW requires an encroachment permit that is issued by Caltrans. To apply, a completed encroachment permit application, environmental documentation, and five (5) sets of plans clearly indicating State ROW must be submitted to: David Salladay, District Office Chief, Office of Permits, California Department of Transportation, District 4, P.O. Box 23660, Oakland, CA 94623-0660. Traffic-related mitigation measures should be incorporated into the construction plans prior to the encroachment permit process. See this website for more information: www.dot.ca.gov/hq/traffops/developserv/permits. 25

Should you have any questions regarding this letter, please contact Brian Ashurst at (510) 286-5505 or brian.ashurst@dot.ca.gov. 26

Sincerely,

PATRICIA MAURICE
District Branch Chief
Local Development - Intergovernmental Review

c: Scott Morgan, State Clearinghouse

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State Agencies

California Department of Transportation (CALTRANS)

Response to CALTRANS-1
The agency provided introductory remarks to open the letter. No response is necessary.

Response to CALTRANS-2
The agency summarized the proposed project. No response is necessary.

Response to CALTRANS-3
The agency stated that the City of American Canyon is responsible for all project mitigation, including any needed improvements to the State Transportation Network.

The proposed project would contribute new vehicle trips over the threshold at 14 intersections that are part of the State Transportation Network. Of these intersections, 13 would operate below acceptable levels of service under the "without project" scenario. Accordingly, under equitable share methodology, the project is only required to contribute a fair share to improvements for these facilities. Moreover, because these intersections are under the jurisdiction of Caltrans, the City of American Canyon does not have the legal ability to implement improvements to these facilities. Thus, Mitigation Measures TRANS-1b and TRANS-1c appropriately disclose that fair share fees would be transferred to Caltrans for implementation of the requisite improvements to the State Transportation Network through a funding agreement between Caltrans, the Napa Valley Transportation Authority (NVTA), and the City of American Canyon.

The lone exception is the intersection of State Route 29 (SR-29)/S. Kelly Road, where the project would cause acceptable "without project" operations to deteriorate to unacceptable levels under the "with project" scenario. Thus, Mitigation Measure TRANS-1d requires the applicant to pay the full cost of these improvements subject to reimbursement for costs outside its fair share. Additionally, several of the improvements contemplated by Mitigation Measure TRANS-1d pertain to facilities under the control of the City of American Canyon (e.g., the segment of S. Kelly Road between SR-29 and Devlin Road), and, therefore, the City would oversee implementation these improvements.

Response to CALTRANS-4
The agency stated that the project is of regional and areawide significance and has the potential for causing significant impacts extending beyond the City of American Canyon. The agency requested that the complete Traffic Impact Study be provided for its review and noted that Draft EIR Appendix I only contains data and turning diagrams.

The Draft EIR's transportation analysis acknowledged the regional significance of the proposed project and evaluated several intersections outside of the American Canyon city limits including SR-12/SR-29, SR-12-29/SR-221-Soscol Ferry Road, SR-12/SR-29/Airport Boulevard and SR-29/Tower Road.

As indicated on Draft EIR page 3.11-29, the transportation analysis is wholly contained in Section 3.11, Transportation, and supporting information (data and turning diagrams) is provided in

Appendix I. The methodology of the transportation analysis is provided on Draft EIR pages 3.11-29 through 3.11-33.

A stand-alone Traffic Impact Study was not prepared nor is required to be prepared by CEQA, the Caltrans Guide for the Preparation of Traffic Impact Studies, or the City of American Canyon Traffic Impact Study Guidelines.

Response to CALTRANS-5
The agency stated that the Traffic Impact Study should include a vicinity map, regional location map, and site plan clearly showing project access in relation to nearby State roadways. The agency stated that project driveways, local roads and intersections, car/bike parking, and transit facilities should be mapped.

The Draft EIR provides a regional location map in Exhibit 2-1, a local vicinity map in Exhibit 2-2, and a site plan (Option 1) in Exhibit 2-4b. The latter exhibit shows parking facilities, the location of all access points, and adjoining roadways. Although not shown on an exhibit, the Draft EIR discloses that Devlin Road currently provides sidewalks and Class II bicycle lanes. There are no existing transit routes or facilities on the segments of Devlin Road or S. Kelly Road adjacent to the project site. As such, the requested information (to the extent it is applicable) is available in the Draft EIR.

Response to CALTRANS-6
The agency stated that the Traffic Impact Study should include project-related trip generation, trip distribution, and assignment including per capita use of transit, rideshare, or active transportation modes. The agency stated that the assumptions and methodologies used to develop this information should be provided and the Traffic Impact Analysis should include a trip generation table showing existing demolition and new construction.

The Draft EIR described the methodology used to development trip generation, distribution, and assignment on pages 3.11-30 through 3.11-33. Table 3.11-7 provides a table showing trip generation by land use and peak hour. Exhibit 3.11-5 shows the trip distribution percentages. Note that no demolition of existing facilities is proposed, and, therefore, no credits were applied against existing trip generation. There is a trip reduction applied to the gas station trips under Option 2 to account for pass-by trips that would not be net new trips to the transportation network.

As previously indicated, there are no existing transit routes or facilities on the segments of Devlin Road or S. Kelly Road adjacent to the project site, and, thus, no mode share adjustments were made for transit usage, rideshare, or active transportation modes.

As such, the requested information (to the extent it is applicable) is available in the Draft EIR.

Lastly, the Caltrans Guide for the Preparation of Traffic Impact Studies is silent regarding the need to identify per capita use of transit, rideshare, or active transportation modes; hence, this information is typically omitted from such studies.

Response to CALTRANS-7
The agency stated that the Traffic Impact Study should include turning movement traffic for each study intersection under all traffic scenarios.

Exhibits 3.11-2, 3.11-6a, 3.11-6b, 3.11-7a, 3.11-7b, 3.11-10a, 3.11-10b, 3.11-12a, 3.11-12b, 3.11-13a, and 3.11-13b provide peak-hour turning movements all study intersections under all scenarios evaluated. As such, the requested diagrams are available in the Draft EIR.

Response to CALTRANS-8
The agency stated that the Traffic Impact Study should include the project site's building potential as identified in the General Plan and noted that the project must be consistent with the Circulation Element of the General Plan, the Congestion Management Agency's Congestion Management Plan, and the Metropolitan Transportation Commission's Regional Transportation Plan.

The project site's General Plan designation of "Industrial" is disclosed on Draft EIR page 2-1 and discussed in detail on pages 3.8-7 through 3.8-46. As discussed in Table 3.8-2, the proposed project is consistent with all applicable provisions of the City of American General Plan, including the Circulation Element. Furthermore, the proposed project does not require a General Plan Amendment.

Regarding the Congestion Management Plan and Regional Transportation Plan, these plans are regional transportation planning documents that address strategies, programs, and improvements to improve mobility within the region. These plans do not regulate development and land use activities at the local level. Applicable aspects of these planning documents are discussed in the Draft EIR (e.g., the planned improvements at SR-12/SR-29/Airport Boulevard and SR-12/SR-29/SR-221) as appropriate. However, it would be in error to suggest that a project can be evaluated for consistency with these documents in the same manner that a project can be evaluated for consistency with a local General Plan, as these planning documents are not intended for that purpose.

Response to CALTRANS-9
The agency stated that the Traffic Impact Study should include a schematic illustration of walking, biking, and auto conditions at the project site and study area roadways, trip distribution percentages and volumes, and intersection geometrics.

Exhibits 3.11-14a and 3.11-14b shows proposed circulation improvement recommendations, including those for bicycles and pedestrians. The Draft EIR concluded that impacts to bicycles and pedestrians would be less than significant after implementation of Mitigation Measure TRANS-8.

The Draft EIR described the methodology used to development trip generation, distribution, and assignment on pages 3.11-30 through 3.11-33. Table 3.11-7 provides a table showing trip generation by land use and peak hour. Exhibit 3.11-5 shows the trip distribution percentages.

Exhibits 3.11-2, 3.11-6a, 3.11-6b, 3.11-7a, 3.11-7b, 3.11-9, 3.11-10a, 3.11-10b, 3.11-11, 3.11-12a, 3.11-12b, 3.11-13a, and 3.11-13b provide lane configurations and peak-hour turning movements at all study intersections under all scenarios evaluated. (Note that Exhibits 3.11-2, 3.11-7a, 3.11-7b, 3.11-9, 3.11-10a, 3.11-10b, 3.11-11, 3.11-13a, and 3.11-13b have been updated in Section 4, Errata.)

As such, the requested information is available in the Draft EIR.

Response to CALTRANS-10
The agency stated that the Traffic Impact Study should include mitigation for increasing vehicle miles traveled. The agency noted that mitigation should support the use of transit and active transportation modes.

The Draft EIR did not include a vehicle miles traveled analysis because the issuance of the Notice of Preparation in December 2014 predated the finalization of State guidance for such analyses. Furthermore, Senate Bill 743 had not been implemented with adopted guidelines at the time of Draft EIR release and, therefore, there was requirement to perform a Vehicle Miles Traveled analysis.

Nonetheless, the Draft EIR does set forth several mitigation measures that would serve to reduce vehicle miles traveled including Mitigation Measures AIR-7b (pedestrian connectivity between Option 2, Lot 1 and the other project parcels) and TRANS-8 (enhanced pedestrian facilities and bicycle storage facilities within project site). As previously noted, there are no existing transit routes or facilities on the segments of Devlin Road or S. Kelly Road adjacent to the project site.

Response to CALTRANS-11
The agency referenced Mitigation Measure TRANS-1d, which pertains to improvements at SR-29/S. Kelly Road, S. Kelly Road/Devlin Road, and along S. Kelly Road between the two intersections; and the agency stated that all improvements should be completed prior to issuance of the first certificate of occupancy. The agency also stated that the provision in the mitigation measure that allows the City the discretion to require the applicant to enter into an off-site improvement agreement and provide acceptable financial guarantee ensure that these improvements will be completed is not applicable and must be removed.

Mitigation Measure TRANS-1d establishes that (1) the contemplated improvements must be completed prior to the first certificate of occupancy; or (2) the applicant enter into an off-site improvement agreement and provide acceptable financial guarantee to ensure that these improvements will be completed. The mitigation measure indicates that implementation of the added lanes would increase capacity at the intersection, but would not result in acceptable conditions because of queues from adjacent intersections. As a result, impacts are identified as significant and unavoidable with implementation of either option.

Improvement agreements are legally binding contracts employed to ensure the required improvements will be completed. Such agreements are commonly entered into for large multi-building projects that will be built over time. Consequently, it is appropriate to determine the timing of implementing the mitigation measure in a legally binding improvement agreement.

Response to CALTRANS-12
The agency stated that Mitigation Measure TRANS-1d should be revised to include the limits of the third through lane in both directions on SR-29 at S. Kelly Road.

Mitigation Measure TRANS-1d stipulates that the intersection of SR-29/S. Kelly Road should be improved to provide three through lanes, two left-turn lanes, and one right-turn lane on the

northbound approach and three through lanes, one left-turn lane, and one right-turn lane on the southbound approach. This lane configuration is intended to be limited to the immediate vicinity of the intersection and would accommodate a future widening of SR-29 to three lanes in each direction. The detailed geometric configuration of the improved intersection would be determined through consultation with Caltrans following project approval.

Response to CALTRANS-13
The agency stated that the Traffic Impact Study should include evaluation of the project's primary and secondary effects on pedestrians, bicyclists, disabled travelers, and transit performance. The agency stated that countermeasures and trade-offs resulting from mitigating vehicle miles traveled increases should be evaluated. The agency stated that access to pedestrian, bicycle, and transit facilities must be maintained.

The Draft EIR evaluated project impacts on public transit, bicycles, and pedestrians on pages 3.11-102 and 3.11-103, and set forth Mitigation Measure TRANS-8 requiring enhancements to proposed pedestrian facilities and the provision of bicycle storage facilities. The discussion on that page also noted that there are existing sidewalks and Class II bike lanes on Devlin Road adjacent to the project site. All existing pedestrian facilities currently comply and all future facilities will comply with the disabled access standards set forth in the Americans with Disabilities Act.

Additionally, the Draft EIR acknowledged on page 2-31 that the planned Napa Valley Vine Trail is proposed to follow Devlin Road within the Napa County Airport Industrial Area. The applicant, the City, and the NVTA will work collaboratively to identify requisite right-of-way dedication along the project frontage with Devlin Road to facilitate the future development of the trail.

Lastly, there are no existing transit routes or facilities on the segments of Devlin Road or S. Kelly Road adjacent to the project site.

For these reasons, no adverse impacts to pedestrians, bicyclists, disabled travelers, and transit performance would occur.

Response to CALTRANS-14
The agency stated that the lane configurations diagrams for the Existing Plus Project mitigation measures and Cumulative Plus Project mitigation measures are missing and should be included.

The mitigation measures are described in detail in Section 3.11, Transportation. For Mitigation Measures TRANS-1b and TRANS-1c, only a fair share contribution is required. The design would be as described in the respective environmental review documents prepared for those regional improvement projects located outside the American Canyon city limits, which are referenced. For Mitigation Measure TRANS-1d, the lane configurations at SR-29/South Kelly Road and Devlin Road/South Kelly road are described in detail for each approach. Therefore, an additional figure is not required since the lane configurations are already described.

Response to CALTRANS-15
The agency stated that intersection level of service values for the Existing Plus Project mitigation measures and Cumulative Plus Project mitigation measures are missing and should be included.

There are several mitigation measures discussed in the DEIR related to specific intersection improvements.

For Mitigation Measures TRANS-1b and TRANS-1c, the mitigation measures state that the applicant would need to contribute a fair share contribution towards the construction costs for these improvements. The designs for these improvements are still in the initial stages and may change before they are constructed and opened. More importantly, implementation of these improvements is outside the jurisdiction of the City of American Canyon; as such, the implementation of the improvements is not within the control of the City and, thus, there is uncertainty that the improvement would be implemented. Therefore, the conclusion for these mitigation measures is a significant and unavoidable impact because the measure relies upon discretionary funding and approval by a third party (Caltrans). Improvement in level of service due to the mitigation measures in based on conclusions made in the respective plans for these improvements.

For Mitigation Measure TRANS-1d, the intersection-level improvements alone would not be sufficient to bring the intersection to a less than significant level of service, due to downstream queuing along SR-29. The Draft EIR mentions that an additional through lane along SR-29 in each direction would be needed to bring the level of service back to a less than significant level. This conclusion is based on the findings from the NCTPA SR-29 Gateway Corridor Improvement Plan (February 2014), which was a high-level planning study.

The LOS results for the intersection of South Kelly Road/Devlin Road after implementation of Mitigation Measure TRANS-2 are summarized in Table 2-1.

Table 2-1: South Kelly Road/Devlin Road Intersection LOS

Scenario	AM Peak Hour	PM Peak Hour
Existing Plus Background Plus Project, Alternative 1	33, C	13, B
Existing Plus Background Plus Project, Alternative 2	33, C	13, B
Cumulative Plus Project, Alternative 1	13, B	12, B
Cumulative Plus Project, Alternative 2	14, B	12, B
Source: Fehr & Peers, 2016.		

Response to CALTRANS-16
The agency requested that queuing impacts be evaluated under the various scenarios and noted that the Draft EIR indicates that SR-29 northbound and southbound queues extend into the upstream intersections under existing conditions. The agency stated that these queue lengths would increase under the various scenarios and should be evaluated.

To address this comment, Fehr & Peers conducted queuing analysis for SR-29. The queuing results for the SR-29 northbound and southbound through movements are provided in Appendix K. Similar to the Draft EIR's intersection analysis, the queuing analysis indicates that numerous queues under the "without project" condition would exceed available storage capacity. This pre-existing deficient

condition would be exacerbated with the addition of project-related trips. Overall, the queuing analysis reconfirms the Draft EIR's conclusion that the SR-29 corridor currently experiences and would continue to experience significant congestion during the AM and PM peak hours.

Response to CALTRANS-17
The agency stated that the lane configuration shown for the Donaldson Way westbound approach appears to be incorrectly shown on Exhibits 3.11-2, 3.11-7, 3.11-9, 3.11-10, 3.11-11, and 3.11-13. The agency stated that the correct lane configuration should show one mandatory left-turn lane, one mandatory through lane, and one mandatory right-turn lane.

The lane configurations have been updated in the exhibits mentioned by the agency and the corrected images are provided in Section 4, Errata. The LOS results in the EIR have been revised to reflect the correct configuration and are provided in Section 4, Errata.

Response to CALTRANS-18
The agency requested that the City consult with Caltrans District 4 Office of Design regarding the timelines for construction of the improvements mentioned in the Planned Transportation Network Changes on Draft EIR pages 3.11-18 through 3.11-20. The agency noted that a statement about the lack of timelines for the construction of many of the improvements discussed on the pages and stated that it may not be accurate.

The statement in question was made in the context of disclosing that the Draft EIR's traffic analysis conservatively did not assume that any of the improvements would be in place. Although in fact there may be conceptual timelines for most if not all of the improvements, none of them have advanced to the point that they are reasonably foreseeable and warrant inclusion in the Draft EIR's traffic analysis.

Response to CALTRANS-19
The agency noted that trips generated by the proposed project and other background projects listed in Table 3.11-9 exceed 1,200 during the AM peak hour and PM peak hour. The agency stated that Transportation Demand Management (TDM) as proposed for the Napa Logistics Park Phase 2 Project should be in place to mitigate traffic impacts on SR-29.

In response to this comment, the City of American Canyon has added the following mitigation measure requiring the implementation of a TDM Agreement for the proposed project. The TDM Agreement would serve to partially alleviate the severity of significant unavoidable impacts identified in Impacts TRANS-1, TRANS-2, TRANS-3, and TRANS-4; however, it would not fully mitigate these impacts to a level of less than significant. Thus, the conclusion of significant and unavoidable would remain unchanged.

MM TRANS-1f: To mitigate this significant impact of greater trip generation from more intense land uses on the project site, the Applicant shall establish a Transportation Demand Management (TDM) program. The intent of the TDM program is to ensure that traffic volumes generated by Project do not exceed that which would occur from warehouse-only uses. Notwithstanding its intent, the applicant shall implement this mitigation measure regardless of the mix of uses that is eventually built. The TDM

Agreement shall establish a peak hour trip budget based on the Institute of Transportation Engineers' "Trip Generation, 8th Edition" Land Use Code 150 (Warehouse).

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

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

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

The Applicant shall retain a transportation planning/ engineering consultant to analyze the effectiveness of the TDM program in a written report. The TDM Report will include data collected from the permanent vehicle counting station and a determination of employee commute methods, which shall be informed by surveying all employees working at the site. The TDM Report shall be submitted to the City on a periodic on-going basis and it shall form the basis of on-going determinations by the City as to the effectiveness of the TDM program.

Additionally, the proposed project would implement Mitigation Measure TRANS-8, which requires enhanced pedestrian facilities and bicycle storage facilities and, therefore, would be accessible to these modes of transportation.

Response to CALTRANS-20

The agency requested clarification for why identical lane configurations are shown in the exhibits for various scenarios, as the Draft EIR includes improvements proposed from various background projects listed in Table 3.11-9.

The EIR includes the traffic forecasted by the background projects and assigned to the existing roadway network in a manner consistent with their original studies, but it does not assume any roadway network improvements as a result of these projects. The planned extensions of Devlin Road via segments "E" and "H" are not assumed to occur, which is a conservative assumption for the purposes of the Existing Plus Background analysis. These extensions are assumed to occur in the Cumulative analysis scenarios. This approach was taken for the analysis of background conditions to provide an indication of whether the project would trigger near-term mitigations.

Response to CALTRANS-21
The agency requested that the Traffic Impact Study include all study intersection results from Synchro.

Traffic operations at all intersections were evaluated using the LOS method described in Chapter 16 of the 2000 Highway Capacity Manual. While the Synchro software package was used to model traffic conditions at most of the study intersections, the VISSIM software package was used to model traffic conditions along SR-29 between American Canyon Road and Napa Junction Road. Because of the existing congestion on this corridor, VISSIM was selected for this analysis because it models the effects of closely spaced intersections and queue spillback from one intersection to another.

Synchro is a macrosimulation tool that uses deterministic equations to evaluate operations at an intersection. VISSIM is a stochastic microsimulation software that analyzes the traffic operations by simulating the movement of individual cars, trucks, transit vehicles, pedestrians, and bicycles. Different random seed numbers generate different driver behaviors and system results. The model is run multiple times to account for the randomness of the simulations and to ensure that the results are reasonable. VISSIM allows the user to control vehicle inputs, vehicle routes, vehicle fleet composition, desired speeds throughout the network, conflict areas to determine yielding behavior, driver behavior, parking areas and behavior, and pedestrian and bicycle volumes and behavior. VISSIM also reflects that conditions at one location can affect conditions at another (i.e., queue spillback from one signalized intersection to another, or "starvation" at a signalized intersection because of poor operations at an upstream location).

Therefore, the LOS results provided in the EIR are appropriate for the context in which each intersection was evaluated. Analyzing the intersections along SR-29 within American Canyon using the Synchro platform would provide an overly optimistic representation of traffic conditions because it would not account for the effects of congested conditions where queues extend long distances and impact adjacent intersections.

Response to CALTRANS-22
The agency stated that Transportation Demand Management programs should be documented with annual monitoring reports to demonstrate effectiveness. The agency listed examples of Transportation Demand Management measures and stated they are consistent with the Regional Transportation Plan's goals. The agency noted that reducing parking supply can encourage active forms of transportation, reduce regional vehicle miles traveled, and lessen future traffic impacts on SR-29.

Transportation Demand Management is addressed in Response to CALTRANS-19.

As noted on Draft EIR page 2-31, the proposed project would provide 579 off-street parking spaces. Under Option 2, the project would need to provide at least 400 off-street parking spaces. The City will consider whether parking reductions are appropriate during the subsequent site plan review.

Response to CALTRANS-23
The agency stated that the proposed project should contribute fair share traffic impact fees given its impacts to SR-29.

Mitigation Measure TRANS-1a requires the project applicant to pay the City's Traffic Impact Fee, which funds improvements to roadways within the City of American Canyon including SR-29. Additionally, Mitigation Measures TRANS-1b and TRANS-1c require the applicant to contribute fair share fees for improvements at SR-12/SR-29/Airport Boulevard and SR-12/SR-29/SR-221.

Response to CALTRANS-24
The agency stated that a Caltrans-approved Traffic Control Plan is required to avoid project-related impacts to the State Transportation Network. The agency summarized requirements for the plan.

Mitigation Measure TRANS-9 requires the project applicant to prepare and submit a Construction Management Plan to the City of American Canyon for review and approval. The mitigation measure requires the plan to identify construction-related traffic, truck routes, and lane closures on public streets. Additionally, the mitigation measure requires the applicant to repair pavement damaged by construction activities. It is anticipated that the Construction Management Plan would satisfy Caltrans requirements for a Traffic Control Plan.

Response to CALTRANS-25
The agency provided standard language about encroachment permit requirements. No project-specific comments were provided. No response is necessary.

Response to CALTRANS-26
The agency provided closing remarks to conclude the letter. No response is necessary.

State of California – The Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Bay Delta Region
7329 Silverado Trail
Napa, CA 94558
(707) 944-5500
www.wildlife.ca.gov

EDMUND G. BROWN JR., *Governor*
CHARLTON H. BONHAM, *Director*

August 22, 2016

Ms. Colette Meunier
City of American Canyon
4381 Broadway Street
American Canyon, CA 94503

Dear Ms. Meunier:

Subject: Napa Airport Corporate Center Project, Draft Environmental Impact Report, SCH #2014122005, Napa County

The California Department of Fish and Wildlife (CDFW) has reviewed the Draft Environmental Impact Report (EIR) for the Napa Airport Corporate Center Project (Project), provided by the City of American Canyon (City). The City granted CDFW an extension to the deadline to submit comments to August 29, 2016 (email communication, Colette Meunier, August 8, 2016). CDFW is providing comments on the draft EIR as a Trustee Agency and Responsible Agency. 1

As Trustee for the State's fish and wildlife resources, CDFW has jurisdiction over the conservation, protection, and management of the fish, wildlife, native plants, and the habitat necessary for biologically sustainable populations of such species for the benefit and use by the people of California. CDFW also acts as a Responsible Agency pursuant to California Environmental Quality Act (CEQA) Section 15381, if a project requires discretionary approval, such as issuance of a California Endangered Species Act (CESA) Incidental Take Permit (ITP) (Fish and Game Code section 2080 *et seq.*), or Lake or Streambed Alteration Agreement (LSAA) (Fish and Game Code section 1600 *et seq.*). Pursuant to our jurisdiction, CDFW has the following concerns, comments, and recommendations regarding the proposed Project. 2

Project Location and Description

The 50-acre Project site is currently undeveloped and located on either side of Devlin Road, in the City of American Canyon. Devlin Road, a two-lane roadway completed in 2012, crosses the project site in a northeast to southwest alignment. The site is bounded by the Napa Branch Line railroad right-of-way to the west and State Route Highway 29 to the east. The Project proposes to construct five warehouse buildings totaling a maximum of 571,808 square feet. 3

Special-Status Wildlife Species - Swainson's hawk

Section 3.3 of the draft EIR (page 12) indicates permanent impacts to suitable foraging habitat for Swainson's hawk (*Buteo swainsoni*), listed as a state threatened species; however, the draft EIR does not discuss mitigation measures to address Swainson's hawk. Swainson's hawk breeds in the western United States and Canada; this species is adapted to forage in open grasslands and agricultural fields. Swainson's hawks often nest peripheral to riparian systems. They will also use lone trees in agricultural fields, or pastures and roadside trees when available, and adjacent to suitable foraging habitat. As important foraging and breeding areas are developed, the aptitude for the landscape to support breeding pair's decreases, and construction in close proximity to a known nest site may eventually lead to nest abandonment. 4

Swainson's hawks are threatened due to loss of nesting and foraging habitat, and CDFW considers impacts to Swainson's hawk foraging habitat to be a potentially significant impact that should be mitigated. CDFW records show several documented Swainson's hawk nest sites within 2.5 miles of the Project area, where the nearest is documented within 1.7 miles of the Project site. Project implementation would therefore result in the permanent loss of approximately 50 acres of suitable foraging habitat for the hawk as well as for other raptor species.

To adequately mitigate for impacts due to permanent conversion of grassland habitat, the draft EIR document should also include measures to avoid or minimize loss of Swainson's hawk foraging habitat that may result from implementation of the Project. Any permanent loss of Swainson's hawk foraging habitat should be appropriately mitigated due to ongoing and cumulative loss of this habitat type in the south Napa Valley area.

4 CONT

To mitigate for the loss of Swainson's hawk foraging habitat in a method consistent with the CDFW Staff Report Regarding Mitigation for Impacts to Swainson's Hawks (*Buteo swainsoni*) in the Central Valley of California (1994), CDFW recommends the draft EIR update Mitigation Measure IV.a.1 to specify the following language:

- For projects within one-mile of an active nest tree (the SWH Staff Report defines an active nest as used during one or more of the last five years), provide one-acre of land for each acre of development authorized (1:1 ratio).
- For projects within five miles of an active nest tree, but greater than one-mile from the nest tree, provide 0.75 acres of land for each acre of development authorized (0.75:1 ratio).
- For projects within 10 miles of an active nest tree, but greater than 5 miles from an active nest tree, provide 0.5 acres of land for each acre of development authorized (0.5:1 ratio).

Mitigation lands should be protected in perpetuity under a conservation easement, and include an endowment fund for long-term resource management for raptor habitat. CDFW is available to work with the applicant to develop a mitigation plan that reduces impacts to less-than-significant.

Mitigation Measures BIO-2a and BIO-2c

Impacts discussed on page 3.3-12 of the draft EIR indicate suitable foraging habitat on-site and known nest sites for Swainson's hawk in the project vicinity. However, proposed Mitigation Measures BIO-2a through BIO-2c do not address preconstruction nesting surveys for Swainson's hawk.

5

To reduce potentially significant impacts to Swainson's hawk, the Mitigation Measures should be revised to specify that protocol-level surveys will be conducted during Swainson's hawk nesting season, which is generally from March 1 until September 15.

Swainson's hawk surveys should be conducted following the Swainson's hawk Technical Advisory Committee's *Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley* (available at http://www.dfg.ca.gov/wildlife/nongame/survey_monitor.html). Surveys should be conducted within a minimum 0.25-mile radius of the proposed Project area, and should be completed for at least the two survey periods immediately prior to initiating any Project-related construction work. Raptor nests may be very difficult to locate during egg-laying or incubation, or chick brooding periods (late April to early June) if earlier surveys have not been conducted.

In order to avoid "take" or adverse impacts to Swainson's hawk in the event that an active nest is found during surveys, CDFW recommends mitigation measures require avoiding all Project-related disturbance within a minimum of 0.25 miles (and up to 0.5 miles depending on site-specific conditions) of a nesting Swainson's hawk during the nesting season. Please refer to the CDFW Staff Report Regarding Mitigation for Impacts to Swainson's Hawks in the Central Valley of California (1994) regarding take avoidance, minimization and mitigation measures.

5 CONT

California Endangered Species Act

If "take" or adverse impacts to Swainson's hawk or any other species listed under the CESA cannot be avoided either during Project activities or over the life of the Project, please be advised that a CESA permit must be obtained (pursuant to Fish and Game Code Section 2080 *et seq.*). Issuance of a CESA permit is subject to CEQA documentation; therefore, the CEQA document should specify impacts, mitigation measures, and a mitigation monitoring and reporting program. If the proposed Project will impact any CESA-listed species, early consultation is encouraged, as significant modification to the Project and mitigation measures may be required in order to obtain a CESA permit. More information on the CESA permitting process can be found on the CDFW website at https://www.wildlife.ca.gov/Conservation/CESA.

6

Lake and Streambed Alteration Agreement

The draft EIR should include a complete and accurate assessment (including physical and hydrologic characteristics) of any aquatic features located within or near the proposed Project area. Any potential direct and indirect impacts of the Project on stream, wetland and/or riparian habitat should be fully identified in the CEQA document. CDFW will require an LSAA, pursuant to Fish and Game Code Section 1600 *et seq.*, with the City for any Project-related activity that will substantially divert or obstruct the natural flow of, or substantially change or use any material from the bed, channel, or bank of a stream, including associated riparian resources, or substantially adversely affect fish and wildlife resources. Issuance of an LSAA is subject to CEQA. CDFW, as a responsible agency under CEQA, will consider the CEQA document for the Project. CDFW may not execute the final LSAA until it has complied with CEQA (Public Resources Code section 21000 *et seq.*) as the Responsible Agency.

7

Stream Resources and Aquatic Habitat

A perennial stock pond is located within the proposed Project site as discussed in Section 3.3 on page 2 of the Biological Resources Section. If perennial water features are maintained, the draft EIR should mitigate impacts associated with habitat for non-native bullfrog (*Lithobates catesbeianus*), which can cause significant adverse impacts to populations of special-status species utilizing adjacent habitats and downstream reaches. To reduce potentially significant impacts, CDFW recommends the City require an invasive species management plan. The plan

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should include, at a minimum an annual survey for bullfrogs. If bullfrogs are identified, the plan should provide potential actions to manage bullfrogs for implementation. Actions may include draining the pond completely between August 1 and November 15 or more direct management options, such as seining and/ or other lawful capture methods. The plan should also include measures to be implemented should the above actions fail to adequately manage bullfrogs. 8 CONT

Environmental Data

CEQA requires that information developed in environmental impact reports be incorporated into a database which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Please report any special-status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNNDB field survey form can be found at the following link: http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/CNDDB_FieldSurveyForm.pdf. The completed form can be mailed electronically to CNDDB at the following email address: CNDDB@wildlife.ca.gov. The types of information reported to CNDDB can be found at the following link: http://www.dfg.ca.gov/biogeodata/cnddb/plants_and_animals.asp. 9

CDFW appreciates the opportunity to provide comments on the draft EIR for the proposed Project. If you have any questions, please contact Ms. Suzanne Gilmore, Environmental Scientist, at (707) 944-5536; or Ms. Karen Weiss, Senior Environmental Scientist (Supervisory), at (707) 944-5525. 10

Sincerely,

Scott Wilson
Regional Manager
Bay Delta Region

cc: State Clearinghouse

California Department of Fish and Wildlife (CDFW)

Response to CDFW-1
The agency provided introductory remarks to open the letter. No response is necessary.

Response to CDFW-2
The agency summarized its regulatory responsibilities. No response is necessary.

Response to CDFW-3
The agency summarized the project characteristics. No response is necessary.

Response to CDFW-4
The agency stated that the Draft EIR indicates permanent impacts to suitable foraging habitat for the Swainson's hawk and provide a summary of types of foraging habitats used by the species. The agency noted that there are several documented Swainson's hawk nest sites within 2.5 miles of the project site, and project implementation would result in the loss of 50 acres of foraging habitat. The agency requested additional mitigation measures that would mitigate the cumulative and permanent loss of Swainson's hawk foraging habitat. Such mitigation would include the following mitigation measures: 1:1 mitigation for foraging habitat within 1 mile of an active nest tree; 0.75:1 mitigation for foraging habitat within 1 to 5 miles of an active nest tree; and 0.5:1 mitigation for foraging habitat within 5 to 10 miles of an active nest tree. The agency recommended that project-related disturbance between 0.25 mile and 0.5 mile of an active nest site should be reduced or eliminated during the critical phases of the nesting cycles. The agency stated that mitigation lands should be protected in perpetuity under a conservation easement. The agency provided standard language about permitting requirements for "take" of Swainson's hawk or other protected species.

The Draft EIR acknowledged on page 3.3-12 that there are five recorded nesting occurrences of the Swainson's hawk, but indicated that there was no suitable nesting habitat for the species on the project site. The Draft EIR acknowledged that ruderal vegetation within the project site can be used as foraging habitat.

The CDFW letter indicates that the mitigation prescriptions for impacts to Swainson's hawk foraging habitat presented in the CDFW's November 1, 1994 "Staff Report Regarding Mitigation for Impacts to Swainson's Hawks (*Buteo swainsoni*) in the Central Valley of California" are relevant to the proposed project. This staff report was prepared 22 years ago at a time when the Swainson's hawk nesting records were limited to a few nests known in the area of Davis, California and to a few nesting records in northeastern California on the Modoc Plateau.

In 1979, a report prepared by Dr. Peter Bloom estimated 375 (±50) breeding pairs of Swainson's hawks remaining in California. Dr. Bloom's report noted that nesting numbers were greatest in the Central Valley and in the Great Basin area of northeastern California, with a few Swainson's hawk territories located in Shasta Valley, the Owens Valley, and the Mohave Desert.[1] In 1988, a CDFW-led survey effort revealed no change in Swainson's hawk distribution from the 1980 report. The 1988 effort led to an estimate of 430 pairs in the Central Valley and a statewide estimate of 550 breeding

[1] Bloom, P.H. 1979. The Status of the Swainson's Hawk in California, 1979. State of California, The Resources Agency, Department of Fish and Game. U.S. Department of the Interior, Bureau of Land Management, California State Office, 2800 Cottage Way, Sacramento, CA 95825. 42 pp.

pairs. In 2005, a statewide survey was conducted in the known range. The results showed a statewide estimate for the number of breeding pairs at 2,081.

Around 2005, Dr. Bloom noted that the Swainson's hawk population in California and indeed throughout its historic range in North America was suffering from acute poisoning from grasshopper insecticides that were being applied directly on their gregarious migration roosts in Argentina. This practice has largely been stopped in Argentina within the last 10 years and the Swainson's hawk nesting population in California has grown significantly as noted above. The Swainson's hawk nesting distribution now occurs in many areas where the Swainson's hawk has not been known to nest for decades, if ever. Napa County, while considered within the historic distribution of the Swainson's hawk, was not known to support nesting site for this hawk in the 1970s or 1980s. Similarly, the nesting population now extends into east Contra Costa County where nesting has not been recorded for many decades. Other nesting population recovery locations include the Antelope Valley and portions of Kern County. The widespread nesting recovery that is documented in the CNDDB[2] and by the personal observations of many other biologists in California is yet to be incorporated into CDFW policy. Accordingly, besides being geographically inappropriate for the proposed project in Napa County, the 1994 "Staff Report Regarding Mitigation for Impacts to Swainson's Hawks (*Buteo swainsoni*) in the Central Valley of California," is also not relevant to current nest territory expansion of the Swainson's hawk population into Napa County and elsewhere in the State. Thus, this document is not appropriately used as a basis for determining mitigation ratios for impacts to annual grassland in Napa County. That Staff Report requires mitigation for projects that impacts foraging habitat within 10 miles of an "active" Swainson's hawk nest (as defined by the CDFW Staff Report). For the reasons provided previously, this mitigation requirement does not reflect the current population expansion of the Swainson's hawk in California, and its use is geographically limited.

It is noteworthy that other raptors that were state and federally listed when the Swainson's hawk was state listed in 1983, such as the bald eagle (*Haliaeetus leucocephalus*) and the peregrine falcon (*Falco peregrinus*), have been delisted (removed from protections provided by both the California Endangered Species Act and the Federal Endangered Species Act). The federal government conducted routine census surveys for these species and determined that the nesting populations of these species had fully recovered, and, thus, protection pursuant to the Federal Endangered Species Act was no longer warranted. CDFW followed these delisting efforts. In contrast, the Swainson's hawk was never federally listed, and as the State of California does not have a recovery plan for the Swainson's hawk, there is no guideline for what constitutes recovery. In addition, the Swainson's hawk has not been counted to the extent that federally listed raptor species were. Thus, mitigation prescriptions developed 22 years ago are very likely outdated today.

The proposed project would provide a 2.7-acre open space area that would include vegetation suitable for foraging by the Swainson's hawk. Additionally, the nearby Napa Logistics Park Project has already preserved 37 acres of annual grassland and seasonal wetland as a Wetland Preserve in perpetuity via a conservation easement that is available to provide foraging habitat for the

[2] California Natural Diversity Data Base. 2015. RareFind 3.2. Computer printout for special-status species within a 5-mile radius of the project site. California Natural Heritage Division, California Department of Fish and Game, Sacramento, CA.

Swainson's hawk. Furthermore, the Newell Open Space is less than 2 miles from the project site and provides 620 acres of annual grassland with discrete areas of oak woodland and riparian woodland that is suitable foraging habitat. Moreover, the Newell Open Space abuts other dedicated open space preserves, including the 1,039-acre Lynch Canyon Open Space Park and the American Canyon 308-acre California red-legged frog preserve.

Combined, these open spaces provide more than 2,000 acres of suitable foraging habitat for the Swainson's hawk within a 5-mile radius of the project site. This demonstrates that, based on the limited number of Swainson's hawk records in Napa County, there is more than sufficient foraging habitat in the American Canyon area. Accordingly, the project will not result in significant impacts to foraging habitat either directly, indirectly, or cumulatively. Construction of the proposed project would not be expected to affect the nesting population of Swainson's hawk known from Napa County in any significant manner or way. Accordingly, additional preservation is not warranted for the proposed project. Thus, there is no potential for indirect or cumulative impacts associated with habitat for Swainson's hawk in this area and the project would not add to any such impact.

Response to CDFW-5

The agency noted that the Draft EIR acknowledged that the project site provides foraging habitat for the Swainson's hawk and noted that Mitigation Measures BIO-2a through BIO-2c do not address pre-construction surveys for nesting hawks.

Although no Swainson's hawk nesting habitat occurs on the project site or in the vicinity of the project site and the hawk is not expected to nest on or near the site, the Draft EIR acknowledges that Swainson's hawks are present in Napa County and may forage on the site. Given the lack of on-site or nearby nesting habitat, there is no substantial evidence supporting a conclusion that project construction could have a significant impact on nesting Swainson's hawks. Nonetheless, the Draft EIR Impact BIO-2 states that the project may have a significant impact on special-status species, including nesting birds. The Draft EIR includes Mitigation Measure BIO-2c requiring nesting bird surveys. In response to the CDFW comment, the following language has been added to Mitigation Measure BIO-2c:

> (Swainson's hawk) Pre-construction surveys shall be conducted for a 0.5-mile radius around all project activities and shall be completed for at least two survey periods immediately prior to project initiation. The surveys shall be conducted in accordance with CDFW's "Recommended timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley" (CDFG 2000), which identifies different survey windows throughout the pre-nesting and nesting season (ranging from January 1 through July 30/post-fledging) that have different survey methodologies and requirements, as set forth in the "Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California Central Valley."
>
> If Swainson's hawks are found to be nesting within 1,000 feet of the project site, nest protection buffers shall be established in consultation with CDFW or as required in any Fish and Game Section 2081 management authorization issued to the project by CDFW.

Response to CDFW-6
The agency provided standard language about the California Endangered Species Act permit requirements for "take" of protected species such as the Swainson's hawk.

As discussed in Response to CDFW-4 the project site does not provide suitable nesting habitat for the Swainson's hawk; refer to Draft EIR page 3.3-12. Thus, "take" of this species would not occur in context of adverse impacts to Swainson's hawk nests.

Additionally, loss of suitable foraging habitat is not considered a "take" under the California Endangered Species Act and, thus, would not require issuance of a permit.

Response to CDFW-7
The agency stated that the Draft EIR should include a complete and accurate assessment of any aquatic features located within or near the project site. The agency provided a summary of Lake and Streambed Alteration Agreement requirements.

The Biological Technical Report prepared by Cardno Entrix (Draft EIR Appendix C) evaluated the aquatic features within and adjacent to the project site, including seasonal wetlands, a perennial stock pond, a roadside ditch, and an artificial pond; refer to Draft EIR pages 3.3-1 and 3.3-2. The Draft EIR disclosed that there are 3.49 acres of seasonal wetlands within the project site and set forth Mitigation Measure BIO-4 requiring the applicant to obtain the requisite permits from the United States Army Corps of Engineers and the San Francisco Bay Regional Water Quality Control Board. Because of the characteristics of the seasonal wetlands, a Lake and Streambed Alteration Agreement is not anticipated.

Response to CDFW-8
The agency noted that a perennial stock pond is located within the project site. The agency stated that if it were to be maintained, the Draft EIR should mitigate impacts associated with habitat for non-native bullfrog, which would cause significant adverse impacts to special-status species utilizing adjacent habitats and downstream reaches. The agency recommended that the City require an invasive species management plan that includes an annual survey for bullfrogs and actions to manage bullfrog populations (e.g., draining the pond between August 1 and November 15, seining, or other lawful capture methods).

The proposed project would retain the existing pond. Bullfrogs have not been observed in this feature during any of the previous site surveys. Furthermore, based on a review of historic aerial imagery, the pond dries out periodically. Considering that bullfrog larvae take two years to mature from egg to froglet, the larvae would not survive long enough to reach that life stage because the pond dries during their aquatic stage.

Additionally, the pond is isolated by urban development from other aquatic habitat that could support bullfrogs; therefore, colonization of the site from other locations is unlikely. Even if a group of adult bullfrogs were able to reach the pond, they would not be able to successfully reproduce because of the periodic drying of the pond that would kill off the eggs and larvae. Based on the lack of bullfrog observations in the pond and the periodic drying of the habitat, it is unlikely that bullfrogs

would occupy the site or would be able to successfully reproduce within the pond. Therefore, an invasive species management plan would not be required.

Response to CDFW-9

The agency stated that CEQA requires that information developed in environmental impact reports be incorporated into a database that may be used to make subsequent or supplemental environmental determinations. The agency requested that any special-status species and natural communities found on-site be inputted into the California Natural Diversity Database (CNDDB).

Three special-status species have been recorded on the site, including tricolored blackbird, burrowing owl, and western pond turtle. The tricolored blackbird observation (nesting was observed in the marsh vegetation in the pond in District 3) has already been included in the CNDDB, though the species has not been observed during recent surveys supporting this Draft EIR. The burrowing owl was a single bird perched on a rail car observed by a previous consultant. It is unknown if the individuals involved submitted this observation to the CNDDB. This species was not observed during the most recent biological survey conducted by Cardno. The western pond turtles were observed in the pond in District 3 during the most recent survey by Cardno biologists. This record will be submitted to the CNDDB.

Response to CDFW-10

The agency provided closing remarks to conclude the letter. No response is necessary.

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NAPA VALLEY TRANSPORTATION AUTHORITY

MEMO

Date: August 8, 2016

To: Colette Meunier, AICP, Contract Planner,
Community Development Department
City of American Canyon

From: Danielle Schmitz, Planning Manager
Napa Valley Transportation Authority

Re: Napa Airport Corporate Center Draft EIR

Upon the review of the Napa Airport Corporate Center Project Draft EIR, the Napa Valley Transportation Authority would like to submit the following comments: 1

- On pages 3.11-11, 3.11-17, 3.11-18, 3.11-20, 3.11-27, 3.11-28, 3.11-48, and elsewhere throughout the document, replace Napa County Transportation Planning Agency (NCTPA), with Napa Valley Transportation Authority (NVTA) to reflect the newly adopted name of the Agency. 2

- On page 3.11-11, the statement indicating that Route 11 has a stop at South Kelly Road and SR-29 is incorrect, the nearest stop is Devlin/Airport Road. Additionally, the route operates from 4:00 AM to 9:20 PM on the weekdays. 3

- Revise Figure 3.11-3
  - Depict either all stops or just time-point stops along all of the Vine routes. Currently , the draft document shows no consistency in the type of stops in the figure among the routes shown.
  - Depict the correct stop for Route 11 along Devlin/Airport Road.
  - A bus stop is shown adjacent to the project site, the narrative correctly notes that there are no transit stops in the nearby vicinity. 4

- On page 3.11-12, Route 29 should be described as operational from 4:40 AM to 8:45 PM. 5

- Changes to Page 3.11-12 and 3.11-20 6

- Update the ACT description to include the following text in italics for increased accuracy
  - "ACT connects to Vine Routes 11 and 29 and operates from 6:00 am to 8:30 am and 3:35 pm to 4:20 pm on weekdays *to accommodate high school students. Outside of these times the shuttle operates door-to-door between the hours of 8:30 am and 5:00 pm on the weekdays."*

6 CONT

- On page 3.11-18, the document references future improvements to SR-29/SR-221, please schedule a meeting with NVTA to discuss revisions to this future improvement.

7

Local Agency

Napa Valley Transportation Authority (NVTA)

Response to NVTA.1-1
The agency referenced provided introductory remarks to open the letter. No response is necessary.

Response to NVTA.1-2
The agency noted that it is now known as "Napa Valley Transportation Authority" and requested that references in the Draft EIR to the "Napa County Transportation Planning Agency" be updated to reflect the new name.

The requested change has been made and is noted in Section 4, Errata.

Response to NVTA.1-3
The agency indicated that a statement about Route 11 serving a stop at South Kelly Road and SR-29 is incorrect. The agency stated that the nearest Route 11 stop is at Devlin Road and Airport Boulevard and the route operates between 4:00 a.m. and 9:20 p.m. on weekdays.

The requested changes have been made and are noted in Section 4, Errata.

Response to NVTA.1-4
The agency requested that Exhibit 3.11-3 be revised to (1) depict all stops or just depict time-point stops; (2) depict the Route 11 stop at Devlin Road and Airport Boulevard; and (3) remove the dot near the project site that suggests there is stop at the project site.

Exhibit 3.11-3 correctly shows the routes of all VINE and ACT bus routes. Although the dots do not perfectly correspond with the time-point stops, this is a minor discrepancy and does not warrant a change.

Response to NVTA.1-5
The agency stated that the text about Route 29 on page 3.11-12 should be revised to indicate that route operates between 4:40 a.m. and 8:45 p.m.

The requested change has been made and is noted in Section 4, Errata.

Response to NVTA.1-6
The agency requested that pages 3.11-12 and 3.11-20 be revised to provide additional information about ACT.

The requested change has been made and is noted in Section 4, Errata.

Response to NVTA.1-7
The agency noted that page 3.11-18 indicates that future improvements are planned at SR-29/SR-221 and requested that a meeting be scheduled to discuss these improvements.

The Draft EIR referenced publicly available information about planned improvements at SR-29/SR-221 contained in the SR-12-29/SR-221-Soscol Ferry Road Flyover Ramp Draft EIR/Environmental Assessment and the SR-29 Gateway Corridor Improvement Plan. Pursuant to Mitigation Measure

TRANS-1b, the applicant would provide a fair share contribution to this improvement. Caltrans or NVTA would be the lead agency for these improvements; neither the City nor the applicant would be responsible for design or construction. Should NVTA still wish to set up a meeting with the City of American Canyon about the planned improvement, City staff is available to meet when appropriate.

NAPA AIRPORT CORPORATE CENTER (NACC) EIR

Transportation Section 1

- **Truck Traffic**, Pg. 3.11-6 — 1
  - Provide clarification on what type of truck levels/numbers were used and how recent those counts are.
- **LOS Intersection analysis,** Pg. 3.11-3 (Exhibit 3.11-1) — 2
  - Should analyze additional future intersections—the only future intersection listed is Green Island Rd./Devlin
    - Tower Rd./Devlin Rd.
    - Airpark Rd./Devlin Rd.
    - South Kelly Rd./Devlin Rd.
- **Planned Transportation Network Changes,** Pg 3.11-19 — 3
  - Diamond interchange alternative is likely to be revised
  - Flyover is being re-evaluated
  - Widening SR-29 from Soscol Junction
- **NVTA, Pg 3.11-18- Duties** — 4
  - Add administration of Measure T and its revenues to list of duties performed by NVTA

Transportation Section 2

- **Watson Ranch Traffic**- 3.11-69. Cumulative effects should be included in this EIR — 5
  - Traffic was not included because project and EIR not approved.
    - The only reason the EIR isn't approved is because the Watson Ranch EIR is being conducted concurrently to this (NACC) EIR.
    - The effects of Watson Ranch Traffic will be significant and this NACC EIR should consider those traffic impacts. — 6
      - 12 intersections out of 27 AM LOS D or above. 15 at LOS E or F without impacts of Watson Ranch traffic.
      - 8 intersections out of 27 PM LOS D or above. 10 at LOS E or F without impacts of Watson Ranch traffic.
- "Delay does not increase in the VisSim models at most of the study intersections, because the additional vehicles generated by the project cannot get to the intersections." 3.11-70 . Is there a post-processing method to conduct traffic analysis and capture additional vehicle generated by projects to fully analyze traffic impacts? — 7

- **Significant impacts,** 3.11-83, should address mitigation — 8
  - SR-12–29/SR-221-Soscol Ferry Road (#2)
  - Airport Boulevard/SR-12–29 (#3)

  Mitigation Measure TRANS-1b

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Napa Valley Transportation Authority (NVTA.2)

Note to reader: This comment letter is in the form of an outline with comments in bullet point format. For certain comments, the City has provided additional elaboration to clarify the comment.

Response to NVTA.2-1
The agency referenced the discussion of truck traffic on Draft EIR page 3.11-6 and requested clarification about the type of truck and frequency of trips, and when counts were collected.

A summary of the traffic counts used in the Draft EIR's traffic analysis is provided on page 3.11-8. To summarize, traffic counts were collected on May 28, 2014 and June 3, 2014. Traffic count worksheets were provided in Appendix I and identify the number of heavy vehicles counted at each intersection during each peak hour. For example, 154 heavy vehicles were counted at the intersection of SR-29/S. Kelly Road during the PM peak hour on May 28, 2014. The heavy vehicle counts do not break down vehicles by axles or weight. Refer to Appendix I for heavy vehicle counts for all study intersections.

Response to NVTA.2-2
The agency referenced the level of service intersection analysis and stated that the Draft EIR should evaluate three future intersections on Devlin Road: Tower Road, Airport Boulevard, and S. Kelly Road.

To clarify, Devlin Road/S. Kelly Road is an existing intersection and was evaluated in the Draft EIR's traffic analysis. Mitigation Measure TRANS-2 requires the applicant to install or provide fees for improvements to this intersection, which would include a signal and westbound left-turn pocket.

Vehicles traveling northbound on the future extension of Devlin Road between Tower Road and Airport Boulevard to reach SR-29 at Airport Boulevard would follow a more circuitous route than if they traveled eastbound on S. Kelly Road to reach SR-29. This routing would incur a significant time penalty and, therefore, trips were not assigned to follow this route. For this reason, there was no basis to assess the intersections of Devlin Road/Tower Road and Devlin Road/ Airport Boulevard.

Response to NVTA.2-3
The agency referenced the planned transportation network changes on Draft EIR page 3.11-19 and noted that (1) the planned grade separated diamond interchange for the SR-12/SR-29/Airport Boulevard is likely to be revised; (2) the planned flyover at SR-12/SR-29/SR-221 is being re-evaluated; and (3) SR-29 is being contemplated for widening south of Soscol Junction.

The discussion of planned transportation network changes on Draft EIR pages 3.11-18 and 3.11-19 noted that various planning efforts were underway and discussed the most recently released plans for each facility. As such, the discussion was phrased in a manner that acknowledged that many of these improvements were conceptual in nature and are subject to change. Regardless, the Draft EIR set forth Mitigation Measures TRANS-1b (SR-12/SR-29/SR-221) and TRANS-1c (SR-12/SR-29/Airport Boulevard) requiring the applicant to contribute fees to the planned improvements that are ultimately chosen for these facilities.

Response to NVTA.2-4
The agency referenced the Draft EIR summary of its duties and requested that administration of Measure T been mentioned as well.

The requested change has been made and is noted in Section 4, Errata.

Response to NVTA.2-5
The agency stated that cumulative effects should be included in the Draft EIR and noted that Watson Ranch traffic was not included by the project and had not yet been approved, and the EIR had not yet been certified. The agency further stated that "The only reason the EIR isn't approved is because the Watson Ranch EIR is being conducted concurrently to this [Napa Airport Corporate Center Project] EIR."

To clarify, the Draft EIR evaluated cumulative effects in Section 4, Cumulative Effects. The Watson Ranch Specific Plan was identified as a cumulative project in Table 4-1. Thus, Watson Ranch was in fact considered a cumulative project.

The Draft EIR provided three separate scenarios for evaluation of traffic impacts. The first two scenarios (Existing and Existing Plus Project; Existing Plus Background Development and Existing Plus Background Plus Project) consider other development projects that were expected to be completed at the time the proposed project was anticipated to open. Generally, these are fully entitled projects, some of which are partially completed (e.g., Napa Logistics Park). Watson Ranch is not yet entitled and, therefore, was not considered to have a high likelihood of completion at the time the Napa Airport Corporate Center Project is likely to open. Thus, it was appropriately omitted from these two scenarios.

The third traffic scenario (Cumulative) considered buildout of the American Canyon and Napa County General Plans. As noted on Draft EIR page 3.11-69, Watson Ranch was accounted for in this scenario.

In summary, Watson Ranch was treated as a cumulative project and traffic generated by it was accounted for in the cumulative traffic analysis.

Response to NVTA.2-6
The agency stated that the effects of Watson Ranch traffic will be significant and the Napa Airport Corporate Center Project EIR should consider those impacts. The agency recited the number of intersections projected to operate at Level of Service D, E, or F.

Refer to Response to NVTA.2-5.

Response to NVTA.2-7
The agency quoted a statement from the Draft EIR regarding how the VisSim traffic model does not forecast increases in delay because vehicles generated by the project cannot get to the intersections and inquired if there is a "post-processing method to conduct traffic analysis and capture additional vehicle generated by projects to fully analyze traffic impacts."

As indicated on Draft EIR page 3.11-70, SR-29 was modeled as a four-lane facility under cumulative conditions and is projected to operate at LOS F, with average delays greater than 80 seconds under the "without project" condition. The results indicate that SR-29 is at capacity and, thus, vehicles generated by the project cannot get to the intersection.

Thus, the limiting factor is the capacity of SR-29; a different analytical methodology would not yield better or more meaningful results since the capacity of SR-29 would remain the same.

Response to NVTA.2-8

The agency stated that the discussion on pages 3.11-83 should address mitigation for SR-12/SR-29/ SR-221 and SR-12/SR-29/Airport Boulevard.

To clarify, the discussion on page 3.11-83 does in fact mention that Mitigation Measures TRANS-1b is proposed for SR-12/SR-29/SR-221 and Mitigation Measure TRANS-1c is proposed for SR-12/SR-29/ Airport Boulevard. Thus, mitigation is discussed for the two facilities in question.

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YOCHA DEHE
CULTURAL RESOURCES

RECEIVED
AUG 01 2016
City of American Canyon
Community Development

July 20, 2016

Ms. Colette Meunier, Consulting Project Planner
City of American River
Community Development Department
4381 Broadway Street, Suite 201
American Canyon, CA 94503

RE: Napa Airport Corporate Center Project

Dear Ms. Meunier:

Thank you for your project notification letter dated, July 1, 2016, regarding cultural information on or near the proposed Napa Airport Corporate Center project, American River, Napa County, CA. We appreciate your effort to contact us and wish to respond. 1

The Cultural Resources Department has reviewed the project and concluded that it is within the aboriginal territories of the Yocha Dehe Wintun Nation. Therefore, we have a cultural interest and authority in the proposed project area. 2

Based on the information provided, the Tribe has concerns that the project could impact undiscovered archaeological deposits. Additionally, Yocha Dehe Wintun Nation requests a site visit to the project area to evaluate our cultural concerns. 3

Please contact the following individual to coordinate a date and time for the site visit.

Mr. James Sarmento
Cultural Resources Manager
Yocha Dehe Wintun Nation
Office: (530) 723-0452, Email: jsarmento@yochadehe-nsn.gov 4

Please refer to identification number YD – 02042014-02 in any correspondence concerning this project.

Thank you for providing us with this notice and the opportunity to comment. 5

Sincerely,

James Kinter
Tribal Secretary
Tribal Historic Preservation Officer

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Tribal Government

Yocha Dehe Wintun Nation (YD)

Response to YD-1
The tribal government provided introductory remarks to open the letter. No response is necessary.

Response to YD-2
The tribal government indicated that it had reviewed the project and concluded that it is within the aboriginal territories of the Yocha Dehe Wintun Nation. It stated that it had a cultural interest and authority in the project area.

Refer to Response to YD-3.

Response to YD-3
The tribal government stated that it has concerns that the project could impact undiscovered archaeological deposits and requests a site visit to the project area to evaluate its cultural concerns.

The Draft EIR sets two mitigation measures that concern discovery of cultural resources during construction. Mitigation Measure CUL-1 establishes procedures for the discovery of historic and archaeological resources (obsidian and chert flakestone tools, artifacts, stone milling equipment, battered stone tools, etc.) and Mitigation Measure CUL-4 establishes procedures for the discovery human remains. Thus, the Draft EIR disclosed the potential for inadvertent discovery of cultural resources and set forth mitigation measures to reduce this impact to a level of less than significant.

City staff and a representative of the property owner met with Laverne Bill, a tribal representative, on the property on August 23, 2016 to walk the site and respond to questions about the proposed development. Subsequently, City staff sent an electronic copy of the 2008 Jones & Stokes cultural report, which was referenced in the Cardno Entrix report to James Sarmento and Laverne Bill.

City staff also obtained a copy of a report from the archaeologist who observed construction of Building 1 in the adjacent Napa Logistics Park development. That archaeologist observed excavation activity on the site during construction and saw no evidence of cultural resources. An electronic copy of this report was also sent to Mr. Sarmento and Mr. Bill.

In summary, recent archaeological evaluations of the project site and a neighboring site found no evidence of archaeological resources. Nonetheless, out of an abundance of caution, the Draft EIR sets forth inadvertent discovery mitigation measures that would address discovery of cultural resources during construction.

Response to YD-4
The tribal government provided contact information. No response is necessary.

Response to YD-5
The tribal government provided closing remarks to conclude the letter. No response is necessary.

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ORCHARD
PARTNERS

Ernie Knodel
Partner

Orchard Partners, LLC
3697 Mt. Diablo Blvd., Suite 200
Lafayette, CA 94549
Tel: 415 272 5252

eknodel@orchardpartners.com
www.orchardpartners.com

August 15, 2016

Ms. Colette Meunier, Consulting Project Planner
City of American Canyon
Community Development Department
4381 Broadway Street, Suite 201
American Canyon, CA 94503

VIA EMAIL: cmeunier@cityofamericancanyon.org

RE: Comments to Draft EIR
Napa Airport Corporate Center
American Canyon, CA

Dear Colette:

We have reviewed the Draft EIR for the Napa Airport Corporate Center (NACC) and would like to offer our comments, clarifications and suggestions. 1

As you are aware, the Napa Logistics Park (NLP) Phase II EIR and Conditional Use Permit were approved by the American Canyon City Council in December 2015. As the developer of NLP, Orchard Partners has been very involved with the city in helping ensure that all of the infrastructure components necessary to support new development are in place to provide efficient facilities to attract new businesses. Additionally, we have been in constant communication with the developers of the NACC project to ensure that there is alignment of interests by all parties.

The two projects had already jointly completed the segment of Devlin Road from South Kelly Road to the NLP project site. This was a condition of approval for the first phases of the mutual projects and included a rail over-crossing. The road work and bridge were privately funded by the respective projects. 2

As we move into the second phases of these projects, additional mutual infrastructure work is required. This includes recycled water, sanitary sewer and road improvements.

The NACC Draft EIR Impact PSU-3 states that the project will be served with recycled water once a connection is made from Green Island Road. This connection is currently being planned as a part of NLP project. The report also states that if this permanent connection is not available when the NACC project proceeds, non-potable water from a well on the NLP site would be utilized. However, this well was designed by NLP to only accommodate capacity for the first phases of each project and Devlin Road. It does not have capacity to serve the project contemplated in this EIR. The NLP project has been further conditioned to provide recycled water mains to the Tower Road area. These installations are to be provided on a fair share basis with the NACC project. In order to provide equity amongst the parties, NACC should also be conditioned to provide the same recycled water mains on a fair share basis as the NLP project. 3

The NACC Draft EIR Impact PSU-4 states that the project would connect to an existing sanitary sewer line within Devlin Road. Currently, this line terminates at the NLP site with a temporary connection to an interim private pump station. The pump station was designed and installed by NLP to serve the first phase of NLP with capacity to accommodate the first phase building of NACC. The NACC project will need the completion of a permanent sanitary sewer system before completing any of the contemplated buildings. The NLP project was conditioned to install certain sanitary sewer mains on a fair share cost basis. In order to provide equity amongst the parties, NACC should also be conditioned to provide the same sanitary sewer mains on a fair share basis as the NLP project. 4

Traffic throughout American Canyon is a primary concern for most. American Canyon is bisected by a commuter highway (SR-29) that experiences unacceptable levels of service at many intersections and many sections of SR-29 during commute hours. The NACC Draft EIR Impact TRANS-1 highlights that the NACC project will have impacts on a number of intersections. A number of mitigation measures (MM) are recommended that will improve these impacts. Notably, MM TRANS-1d requires that NACC provide specific improvements South Kelly Road and its intersections with SR-29 and Devlin Road. These improvements would be needed for the NACC project alone. The same improvements are required by the NLP project if NLP were to proceed alone. However, these improvements should be viewed on the basis of a cumulative impact from projects and growth throughout the area. Impact TRANS-3 analyzes this cumulative impact and recommends the same mitigation measures to South Kelly Road with the addition of signals at the intersection of Devlin Road. With these measures, these intersections would be vastly improved but the level of service would remain a significant unavoidable impact until regional improvements are completed along SR-29. MM Trans-1d contemplates those ultimate improvements. 5

Ultimately, the primary responsibility for completing the aforementioned improvements will be shared between NACC and NLP. Individually, each project would require these improvements be completed. Therefor, we propose that the projects are equally responsible for completing these improvements. Approval of this EIR should be conditioned on the project providing the improvements and the city would seek reimbursement for half the cost from the other project. 6

Thank you for this opportunity to respond to the Draft EIR. We are supportive of this project and we look forward to continued cooperation between the city, the applicant and all other associated parties. 7

Best regards,

ORCHARD PARTNERS, LLC

Ernie Knodel
Partner

cc Tim Schaedler – Panattoni
Grant Gruber – First Carbon Solutions
Tyler Higgins – Orchard Partners, LLC
Jamie Lasher - DivcoWest

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Private Business

Orchard Partners, LLC (ORCHARD)

Response to ORCHARD-1
The business provided introductory remarks to open the letter. No response is necessary.

Response to ORCHARD-2
The business provided background on the Napa Logistics Park Phase 2 Project and noted that the segment of Devlin Road that extends south from S. Kelly Road was jointly funded and constructed by the Napa Logistics Park Phase 2 Project applicant and Napa Airport Corporate Center applicant. No response is necessary.

Response to ORCHARD-3
The business referenced Draft EIR Impact PSU-3, which indicates that the project would be served with recycled water from a future line that would be extended from Green Island Road. The business noted that there is a statement that the Napa Airport Corporate Center's non-potable water needs would be met from a well on the Napa Logistics Park site until the recycled water line is extended. The business stated that the well was designed to serve only the first phase of each project and Devlin Road; it does not have capacity to serve the project contemplated in the Napa Airport Corporate Center EIR. The business also noted that Napa Logistics Park has been conditioned to provide recycled water mains on a fair share cost basis to the Tower Road area and that Napa Airport Corporate Center should also have a similar condition.

The City of American Canyon has confirmed that the Napa Logistics Park private well will not be available to serve the proposed project. The statement on Draft EIR page 3.10-16 has been revised to reflect this condition. The change is noted in Section 4, Errata.

The City of America Canyon intends to condition Napa Airport Corporate Center in the same manner as Napa Logistics Park in terms of fair share contributions to recycled water mains.

Response to ORCHARD-4
The business referenced Draft EIR Impact PSU-4, which indicates that the project would connect to a sewer line within Devlin Road. The business noted that this sewer line currently terminates at the Napa Logistics Park and a private pump station is being used on an interim to convey effluent to the Tower Road pump station. The business stated that the private pump station was designed to only serve the first phase of each project and Devlin Road; it does not have capacity to serve the project contemplated in the Napa Airport Corporate Center EIR. The business also noted that Napa Logistics Park has been conditioned to install sewer mains on a fair share cost basis to the Tower Road area and that Napa Airport Corporate Center should also have a similar condition.

The City of American Canyon has confirmed that the proposed project would be required to implement sewer system improvements and connect to the existing sewer system at Tower Road if the planned sewer extension is not completed by the time the project is completed. The statement on Draft EIR page 3.10-44 has been revised to note this condition. The change is noted in Section 4, Errata.

The City of America Canyon intends to condition Napa Airport Corporate Center in the same manner as Napa Logistics Park in terms of fair share contributions to sewer mains.

Response to ORCHARD-5
The business stated noted that SR-29 experiences unacceptable levels of service during commute hours and noted that the Draft EIR indicates that the Napa Airport Corporate Center would will have impacts on a number of intersections. The business referenced Mitigation Measure TRANS-1d, which requires improvements to S. Kelly Road between SR-29 and Devlin Road, and noted that Napa Airport Corporate Center and Napa Logistics Park would both individually trigger them. The business stated that improvements at this intersection should be viewed on the basis of cumulative impacts from projects and growth throughout the area and noted that Mitigation Measure TRANS-1d would also serve to mitigate impacts for the cumulative traffic scenario.

Improvements to S. Kelly Road between SR-29 and Devlin Road are triggered under the Existing Plus Project scenario, signifying that the proposed project is the primary cause of the unacceptable operation. Thus, Napa Airport Corporate Center is responsible for the full cost of the improvement. However, in this case, Napa Logistics Park Phase 2 also triggers an impact to this facility under the Existing Plus Project scenario, and, thus, it would also bear the responsibility for the full cost of the improvement. As such, Mitigation Measure TRANS-1d explains that both projects trigger the need for improvements and establishes a process by which the first project to proceed installs the improvement and is ultimately reimbursed for costs outside its fair share by the other project.

Regarding the cumulative scenario, the "without project" condition assumed that no improvements would be made to this segment of S. Kelly Road. Mitigation Measure TRANS-1d would serve to mitigate operations at this facility and thus was appropriately identified as a mitigation measure for cumulative impacts. For the reasons previously described, the need for improvements to S. Kelly Road are first triggered by either Napa Airport Corporate Center or Napa Logistics Park Phase 2; thus, these two projects are responsible for the cost of the improvements.

Response to ORCHARD-6
The business stated that the primary responsibility for completing the aforementioned improvements will be shared between Napa Airport Corporate Center and Napa Logistics Park. The business stated that, "Approval of this EIR should be conditioned on the project providing the improvements and the city would seek reimbursement for half the cost from the other project."

As noted in Response to ORCHARD-5, Mitigation Measure TRANS-1d establishes a process by which the first project to proceed installs the improvement and is ultimately reimbursed for costs outside its fair share by the other project. The methodology for determining fair share will be addressed in the conditions of approval or by agreement between the project applicant and Napa Logistics Park.

Response to ORCHARD-7
The business provided closing remarks to conclude the letter. No response is necessary.

SECTION 3: RESPONSES TO PLANNING COMMISSION COMMENTS

3.1 - Introduction

The City of American Canyon solicited public comments on the Napa Airport Corporate Center Project Draft Environmental Impact Report (Draft EIR) (State Clearinghouse No. 2014122005) on Thursday, July 28, 2016 at a Planning Commission meeting held at American Canyon City Hall, 4381 Broadway Street, American Canyon, California.

3.2 - List of Speakers and Authors

A list of the speakers who provided verbal comments at the planning commission meeting is presented below. Each speaker has been assigned a code. Individual comments within each communication have been numbered so comments can be crossed-referenced with responses.

July 28, 2016 Planning Commission Meeting

Speaker

John Azevedo
Nancy Matheson
Planning Commission Vice Chair Bernie Zipay
Planning Commissioner Keith Pepper
Planning Commissioner Rich Peterson
Planning Commission Chair Eric Altman

3.3 - Meeting Minutes

The meeting minutes are reproduced on the following pages is from the July 28, 2016 Planning Commission meeting.

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CITY OF AMERICAN CANYON

PLANNING COMMISSION MEETING
4381 Broadway, Suite 201
American Canyon, CA 94503
July 28, 2016

MINUTES

CALL TO ORDER – 6:31 P.M.

ROLL CALL:

Present: Commissioners Pepper, Peterson (arrived at 6:33 P.M.), Vice Chair Zipay, and Chair Altman
Absent: Navarro

PRESENTATION – None

PUBLIC COMMENT - No Public Comment

AGENDA CHANGES – There were no changes to the agenda

CONSENT CALENDAR

1.1. Consideration of Minutes from the Regular Meeting of May 26, 2016.
ACTION: Moved by Vice Chair Zipay, seconded by Commissioner Pepper, and carried unanimously, to approve the Consent Item 1.1.

PUBLIC HEARINGS

2.1. Adopt a resolution approving the notice of merger of two vacant lots at 112 Lombard Road and the adjacent lot to the east of it into a single lot.
ACTION: Moved by Commissioner Pepper, seconded by Vice Chair Zipay, and roll call vote carried unanimously to approve Resolution No. 2016-09.

BUSINESS

3.1. Presentation regarding the Napa Airport Corporate Center (NACC) Draft Environmental Impact Report (Draft EIR)
Speakers: Frank John Azevedo, Business Owner, and Nance Matson, Resident.

3.2. Presentation regarding the Watson Ranch Specific Plan (WRSP) Draft Environmental Impact Report (Draft EIR)
Speaker: Stephen Hilton, Resident.

STAFF ITEMS:

4.1. Active Planning Projects
Community Development Director Cooper gave an update on current projects.

ANNOUNCEMENTS: Chair Altman read the City meetings announcements

COMMISSIONER ITEMS: None

ADJOURNMENT: The meeting adjourned at 8:47 P.M.

_____ _____

Avril Rockwood, Administrative Clerk II Eric Altman, Chair

3.4 - Responses to Planning Commission Meeting Comments

3.4.1 - Introduction

Responses to comments made at the July 28, 2016 Planning Commission meeting are provided through individual responses. Please be advised that the membership of the Planning Commission changed between the time of the July 28, 2016 meeting and the release of the Final EIR in April 2018. Thus, the Final EIR reflects the membership of the Planning Commission in July 2016.

3.4.2 - Responses to Comments

John Azevedo

Summary of Comments

Mr. Azevedo, owner of Pacific Auto Salvage, expressed concern about project-related storm drainage impacts on his neighboring property. He noted that, under existing conditions, runoff sheet flows from Pacific Auto Salvage towards the project site. Mr. Azevedo expressed concern that grading and site improvements associated with the proposed project would prevent sheet flow from occurring in the future, thereby creating drainage problems on his property.

Response to Comments

The development application on file includes a preliminary grading plan and a preliminary Storm Water Management Plan which do not show that the future developed project site will prevent existing stormwater drainage from continuing to sheet flow from Mr. Azevedo's property onto the project site, and continuing on to discharge ultimately into the Napa River. Should the project be approved, detailed on-site improvement plans would be required to be submitted, reviewed, and would be subject to City approval. These plans would be required to show all finished grades, and how all utilities and stormwater drainage will be handled on the site. The bio-swales, stormwater detention areas, and drainage structures on the project site would be required to be designed, located, and sized to accommodate both the existing stormwater flows that enter the project site from Mr. Azevedo's adjacent property, together with the increased drainage that will result from building impervious surfaces such as buildings, parking, and driveways.

These requirements for the proposed development to accommodate existing drainage flows is consistent with the City's approvals and requirements for other development, and is consistent with California case law regarding stormwater drainage.

Nancy Matheson

Summary of Comments

Ms. Matheson inquired about where wetlands mitigation would occur. She also expressed a desire for more bicycle and pedestrian facilities, including bicycle racks near buildings.

Response to Comments

As disclosed on Draft EIR page 3.3-35, the project site contains 3.49 acres of seasonal wetlands. Mitigation Measure BIO-4 requires the applicant to obtain all necessary regulatory permits for waters of the United States and waters of the State, and mitigate impacts in accordance with regulatory agency requirements to achieve "no net loss."

It is anticipated that mitigation for impacted wetlands would occur on-site within the 2.7-acre open space area and off-site within the wetland preserve established as part of the nearby Napa Logistics Park Project. If these two sites to not allow for sufficient offsets of impacted wetlands, the applicant would purchase credits at a mitigation bank in the region—likely somewhere in the North Bay. Regardless, the regulatory agencies would review and approve the proposed mitigation scheme.

The Draft EIR acknowledged on pages 3.11-102 and 3.11-103 that the project site plan could be improved to better facilitate bicycle and pedestrian mobility and proposed Mitigation Measure TRANS-8 to accomplish this objective. The mitigation measure require the applicant to prepare a site plan depicting pedestrian facilities that accomplish safe, accessible travel between internal roadways and building entrances and the provision of bike racks or lockers at strategic locations to serve each building. The City of American Canyon would review the site plan for compliance with this mitigation prior to issuing building permits.

Planning Commission Vice Chair Bernie Zipay

Summary of Comments

Vice Chair Zipay inquired about health risk and noise impacts on the single-family residence that immediately adjoins the project site.

Response to Comments

To preface this response, the single-family residential parcel is owned by Mr. William Gonsalves, who previously owned the project site before selling it to a third party and splitting his residential parcel from it. Mr. Gonsalves attended the project scoping meeting in December 2014 and is aware of the proposed application, including the option to develop a fuel station and restaurant on Lot 1 adjacent to his property.

The Draft EIR disclosed that project-level cancer risks from construction emissions at the single-family residence would exceed the Bay Area Air Quality Management District's 10 in 1 million threshold. As described on pages 3.2-43 and 3.2-44, the cancer risk analysis is based on a conservative assumption that the residence would be occupied by a pregnant woman in her third trimester. If a pregnant woman does not reside in the house during construction activities, the impact would be less than significant. (Note that the City of American Canyon is not aware of any pregnant women residing in the house at the current time). Thus, the cancer risk conclusion is primarily a function of the methodology employed in the analysis.

The Draft EIR evaluated noise impacts on the residence from construction and operational activities. Construction noise was found to be as loud as 90 dBA L_{max} and, therefore, Mitigation Measures NOI-1a and NOI-1b were set forth to reduce impacts to less than significant levels. In particular, Mitigation Measure NOI-1 requires the applicant to construct a permanent sound barrier along the property line to protect the single-family residence from noise. Operational noise impacts were found to be less than significant and did not require mitigation.

Planning Commissioner Keith Pepper

Summary of Comments

Commissioner Pepper inquired if the proposed exceptions for building setbacks and landscaping requirements would result in less impacts if they were not pursued.

Response to Comments

The Draft EIR disclosed on page 2-41 that the two proposed exceptions would (1) allow for Building B to reduce its average front yard setback to 25 feet from 40 feet and (2) reduce Building H's minimum 25-foot landscaping width requirement to as little as 1 foot adjacent to the Devlin Road retaining wall. No exceptions are proposed for Lots 1, 5, or 6.

If the proposed exceptions were not pursued, Building B and Building H would be smaller than currently proposed and, therefore, the overall project square footage would be reduced. The Draft EIR evaluated the Reduced Density Alternative, in which overall project square footage was reduced by 182,720 square feet. The analysis found that while the alternative would lessen the severity of the proposed project's significant air quality/greenhouse gas emissions and transportation impacts through a reduction in construction activity and fewer new vehicle trips, it would still yield significant unavoidable impacts conclusions because the project is still large enough to have significant impacts.

Thus, it can be reasoned that reductions in the size of Building B and Building H to avoid the need for exceptions—which would likely be far less than the 182,720 square-foot reduction contemplated by the Reduced Density Alternative—would yield a similar conclusion.

Planning Commissioner Rich Peterson

Summary of Comments

Commissioner Peterson expressed an interest in the Reduced Density Alternative and wanted more information about it.

Response to Comments

In accordance with CEQA Guidelines Section 15126.6, the Draft EIR evaluated alternatives to the proposed project that would advance most of the project objectives but had the potential to lessen or avoid the project's significant impacts. It should be noted that the two development alternatives evaluated in Draft EIR Section 5, Alternatives to the Proposed Project (Reduced Density Alternative and Business Park Alternative) are conceptual in nature; no applications are on-file with the City of American Canyon to pursue either one.

The Reduced Density Alternative consists of eliminating Building G, which would reduce project square footage by 182,720 square feet. In lieu of a warehouse building, Lot 6 would support an 11.42-acre private outdoor recreational area. This concept was based on (1) reducing overall project square footage by a significant amount; (2) avoiding impacts to the portion of the site that contains the most seasonal wetlands (refer to Exhibit 3.3-2); and (3) enhancing the proposed open space area by making it contiguous to an 11.42-acre private outdoor recreational area.

As previously noted, the Draft EIR found that while the Reduced Density Alternative would lessen the severity of the proposed project's significant air quality/greenhouse gas emissions and transportation impacts through a reduction in construction activity and fewer new vehicle trips, it

would still yield significant unavoidable impacts conclusions on these topics. Thus, there would be a significant reduction in economic benefits and only marginal decreases in the severity of significant unavoidable impacts under the Reduced Density Alternative.

Planning Commission Chair Eric Altman

Summary of Comments

Chair Altman inquired if the City of American Canyon had any indications from the Napa County Airport Land Use Compatibility Commission about the acceptability of the proposed building heights, which would be as tall as 75 feet above finished grade. He also inquired if Option 1 or Option 2 was the preferred use for Lot 1.

Response to Comments

The Draft EIR was distributed to the Napa County Airport Land Use Compatibility Commission as part of the public release on July 1, 2016. As of the date of Final EIR publication, the City of American Canyon had not received any comments from the Napa County Airport Land Use Compatibility Commission or any other public agency or private party concerning building height.

The project will ultimately be reviewed by the Napa County Airport Land Use Compatibility Commission.

The City of American Canyon has two applications on file for Lot 1 and, therefore, both Option 1 and Option 2 were evaluated in the Draft EIR. As of the date of Final EIR publication, the applicant has not indicated which option it is likely to pursue; however, because the Draft EIR considered both options, this issue is outside the scope of the environmental review process.

SECTION 4: ERRATA

The following are revisions to the Draft EIR for the Napa Airport Corporate Center Project. These revisions are minor modifications and clarifications to the document, and do not change the significance of any of the environmental issue conclusions within the Draft EIR. The revisions are listed by page number. All additions to the text are underlined (<u>underlined</u>) and all deletions from the text are stricken (~~stricken~~).

4.1 - Changes to Draft EIR Text

Section ES, Executive Summary

Table ES-1

A revised entry for Mitigation Measure BIO-2c and a new entry for Mitigation Measure TRANS-1f have been added.

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Table ES-1: Executive Summary Matrix

Impacts	Mitigation Measures	Level of Significance After Mitigation
Impact BIO-2: The proposed project may have a substantial adverse effect on special status wildlife species.	**MM BIO-2c:** No more than 30 days prior to ground-disturbing activities that occur within 500 feet of potential nest trees for raptors or 250 feet of suitable nesting habitat for non-raptor bird species (i.e., trees, cattails, grassland) between February 1 and September 15, the project applicant shall retain a qualified biologist to conduct nesting bird surveys. The survey report shall be submitted to CDFW. If no active nests of Migratory Bird Treaty Act covered species are identified, then no further mitigation is required. If active nests of protected bird species are identified, the project applicant shall consult with the appropriate regulatory agencies to identify project-level mitigation requirements. Mitigation may include the following, based on current agency standards and policies: 1) The project applicant shall delay construction in the vicinity of active nest sites during the breeding season (February 1 through September 15) while the nest is occupied with adults or young. A qualified biologist shall monitor any occupied nest to determine when the nest is no longer used. If the construction cannot be delayed, avoidance measures shall include the establishment of a non-disturbance buffer zone around the nest site. The buffer zone for non-raptor species shall be 250 feet, or as determined in consultation with CDFW. The buffer zone shall be delineated with highly visible temporary construction fencing. 2) No intensive disturbance (e.g., heavy equipment operation associated with construction, or use of cranes) or other project-related activities that could cause nest abandonment or forced fledging shall be initiated within the established buffer zone of an active nest between February 1 and September 15. 3) If construction activities are unavoidable within the buffer zone, the project proponent shall consult with CDFW and retain a qualified biologist to monitor the nest site to determine if construction activities are disturbing the adult or young birds. If disturbance is observed, the biologist shall have authority to stop construction within the buffer zone until the bird species have vacated the nest of their own accord. 4) If fully protected species (white-tailed kites, golden eagles) are found to be nesting near the proposed construction area, their nests shall be completely avoided until the birds fledge. Avoidance shall include the establishment of a non-disturbance buffer zone of 500 feet, or as determined in consultation with the CDFW. <u>(Swainson's hawk) Pre-construction surveys shall be conducted for a half-mile radius around all project activities and shall be completed for at least two survey periods immediately prior to project initiation. The surveys shall be conducted in accordance with CDFW's "Recommended timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley" (CDFG 2000), which identifies different survey windows throughout the pre-nesting and nesting season (ranging from January 1 through July 30/post-fledging) that have different survey methodologies and requirements, as set forth in the "Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California Central Valley."</u>	Less than significant impact.

Table ES-1 (cont.): Executive Summary Matrix

Impacts	Mitigation Measures	Level of Significance After Mitigation
	If Swainson's hawks are found to be nesting within 1,000 feet of the project site, nest protection buffers shall be established in consultation with CDFW or as required in any Fish and Game Section 2081 management authorization issued to the project by CDFW.	
Impact TRANS-1: The proposed project would contribute to unacceptable traffic operations under Existing Plus Project Traffic conditions.	**MM TRANS-1a:** The project applicant will be responsible for paying the City's Traffic Impact Fee for the proposed development. The funds collected under this program would be used to make improvements to a number of intersections throughout American Canyon, improvements to which would lessen the significant cumulative transportation impacts. However, because these projects for which the Applicant would make a fair share contribution pursuant to this mitigation measure rely upon discretionary funding and approval by a third party (Caltrans), the impact would remain significant and unavoidable. **MM TRANS-1b**: Prior to issuance of the first construction permit for each building in the proposed project, the project applicant shall pay a fair share contribution towards the estimated construction costs for the following identified regional project on the state highway system. The fair share shall be calculated at the time payment is required, based on the projected traffic of the proposed use of the building, and the estimated cost of the construction at that time. Fair share shall be calculated by following the "Method for Calculating Equitable Mitigation Measures" from Caltrans Guide to the Preparation of Transportation Impact Studies (2002)": • The SR-12–29/SR221-Soscol Ferry Road Flyover Ramp, currently estimated at $40 million according to Caltrans's SR-29/221 Soscol Junction Improvement Project Draft Environmental Impact Report/Environmental Assessment (dated March 2015). • Because this project for which the Applicant would make a fair share contribution pursuant to this mitigation measure relies upon discretionary funding and approval by a third party (Caltrans), the impact would remain significant and unavoidable. The aforementioned parties (Caltrans, NCTPA, and the City of American Canyon, at minimum) will be required to develop formal agreements regarding the funding sources for these projects and the mechanism for collecting and transferring the funds for this mitigation measure to be feasible. **MM TRANS-1c:** Prior to issuance of the first construction permit for each building in the proposed project, the project applicant shall pay a fair share contribution of the estimated construction costs for the following identified regional project on the state highway system. The fair share shall be calculated at the time payment is required, based on the projected traffic of the proposed use of the building, and the estimated cost of the construction at that time. Fair share shall be calculated by following the "Method for Calculating Equitable Mitigation Measures" from Caltrans Guide to the Preparation of Transportation Impact Studies (2002)":	Significant unavoidable impact.

Table ES-1 (cont.): Executive Summary Matrix

Impacts	Mitigation Measures	Level of Significance After Mitigation
	• The grade-separated Airport Boulevard/SR-12–29 Interchange Project, planned by Caltrans, is currently estimated at $73 million according to the NCTPA SR-29 Gateway Corridor Improvement Plan (dated February 2014). • Because this project for which the Applicant would make a fair share contribution pursuant to this mitigation measure relies upon discretionary funding and approval by a third party (Caltrans), the impact would remain significant and unavoidable. The aforementioned parties (Caltrans, NCTPA, and the City of American Canyon, at minimum) will be required to develop formal agreements regarding the funding sources for these projects and the mechanism for collecting and transferring the funds for this mitigation measure to be feasible. **MM TRANS-1d:** Prior to issuance of the first certificate of occupancy for the proposed project, the Applicant shall construct the following improvements along South Kelly Road, or, at the sole discretion of the City, enter into an off-site improvement agreement and prove an acceptable financial guarantee ensuring that these improvements will be completed: (1) At the intersection of SR-29 at South Kelly Road: • Northbound approach: three through lanes, two left-turn lanes, one right-turn lane • Southbound approach: three through lanes, one left-turn lane, one right-turn lane • Eastbound approach: one through lane, two left-turn lanes, one right-turn lane • Westbound approach: one through lane, two left-turn lanes, one right-turn lane (2) At the intersection of South Kelly Road and Devlin Road: • Northbound approach: one through lane, one right-turn lane • Southbound approach: one through lane, one left-turn lane • Private driveway: None • Westbound approach: one left-turn lane, one right-turn lane (3) South Kelly Road, between Devlin Road and SR-29 intersections: • Two westbound receiving lanes, one eastbound lane, and one two-way left turn lane. The length of the turn lanes on SR-29 shall be in accordance with the Caltrans Highway Design Manual requirements for a 55-mph highway, and shall accommodate sufficient vehicle storage length for STAA vehicles under Existing Plus Background Plus Project conditions such that the intersection operates at least LOS D. The length of the turn lanes on South Kelly Road shall accommodate sufficient vehicle storage length under Existing Plus Background Plus Project conditions such that the intersection operates at least LOS D. The Applicant shall fund 100 percent of the cost of these improvements. To the extent these	

Table ES-1 (cont.): Executive Summary Matrix

Impacts	Mitigation Measures	Level of Significance After Mitigation
	improvements represent oversizing that is over and above what would be necessary to mitigate the impacts of the project, the Applicant shall be eligible for reimbursement for costs above its fair share from other nearby private development on Assessor's Parcel Numbers 057-090-083 and 84 that will also contribute traffic to this intersection. Prior to incurring any expenses for which they may be eligible for reimbursement, the Applicant shall enter into a reimbursement agreement with the City. This mitigation measure is the same as one that was required of Napa Logistics Park Phase 2 on Assessor's Parcel Number 057-090-083. In the event that, at the time of issuance of the first building permit within the Napa Airport Corporate Center project, construction of the improvements described in this mitigation measure has commenced, or the developer of Napa Logistics Park Phase 2 has entered into an agreement with the City of American Canyon to fund and construct these improvements, then the Applicant for Napa Airport Corporate Center project shall not be responsible to fund and construct the improvements but shall be subject to obligations for fair share reimbursement for the improvements. The implementation of this mitigation measure would be done in conjunction with construction that has already been planned and approved. The additional construction activity may incrementally increase construction traffic, noise, and air emissions in the activity area, but would not change the analysis, conclusions, or mitigation measures in this EIR. Construction activity associated with this mitigation measure would be required to comply with all applicable local and state laws and regulations such as dust suppression, limitations on hours of construction, stormwater runoff controls, and other similar requirements designed to reduce or avoid environmental impacts. Because the South Kelly Road intersection at SR-29 is impacted in the PM peak hour as a result of downstream queues, the impact at this intersection would remain significant and unavoidable with the implementation of this mitigation measure without changes to SR-29 through the City of American Canyon (between Napa Junction Road and American Canyon Road). As a result of the implementation of this mitigation measure, the significant impacts at the South Kelly Road intersection with Devlin Road are reduced to a less than significant level. **MM TRANS-1f:** To mitigate this significant impact of greater trip generation from more intense land uses on the project site, the Applicant shall establish a Transportation Demand Management (TDM) program. The intent of the TDM program is to ensure that traffic volumes generated by Project do not exceed that which would occur from warehouse-only uses. Notwithstanding its intent, the	

Table ES-1 (cont.): Executive Summary Matrix

Impacts	Mitigation Measures	Level of Significance After Mitigation
	applicant shall implement this mitigation measure regardless of the mix of uses that is eventually built. The TDM Agreement shall establish a peak hour trip budget based on the Institute of Transportation Engineers' "Trip Generation, 8th Edition" Land Use Code 150 (Warehouse). The Applicant shall enter into a TDM Agreement prior to the issuance of the first building permit. The TDM Agreement shall require that an effective TDM program be implemented prior to the first certificate of occupancy and be subjected to on-going periodic monitoring thereafter. The TDM Agreement shall also include a financial guarantee satisfactory to the City. The TDM program shall be implemented at the applicant's cost, with no cost to the City, regardless of the eventual mix of uses and shall at a minimum include a permanent vehicle counting station at the single public access point. Examples of measures that may be considered as part of an effective TDM program include but are not limited to the following: • Starting and ending workday shifts during off-peak hours (i.e., not between 7:00 a.m. to 9:00 a.m. or 3:00 p.m. to 6:00 p.m.). • Implement shuttle service to key employment centers or park-and-ride lots in the area for those employees whose workday shift start during peak hours. • Car-share program • Shuttles to regional transit • Transit subsidies • Carpool/vanpool subsidies • Employer-owned/sponsored vanpools • Flex-time and telecommute programs • Use of rail for Lot H The Applicant shall retain a transportation planning/engineering consultant to analyze the effectiveness of the TDM program in a written report. The TDM Report will include data collected from the permanent vehicle counting station and a determination of employee commute methods, which shall be informed by surveying all employees working at the site. The TDM Report shall be submitted to the City on a periodic on-going basis and it shall form the basis of on-going determinations by the City as to the effectiveness of the TDM program.	

Section 3.1, Aesthetics, Light, and Glare

Page 3.1-5, Last Two Paragraphs and Page 3.1-6, First Two Paragraphs

The paragraphs have been modified to reflect the altered square footages.

The proposed project consists of developing up to 515,621 ~~571,808~~ square feet of warehouse and wine warehouse uses and associated infrastructure on the project site. As an option, one of the warehouse buildings would be replaced with a gas station and restaurant. All utility connections would be located underground and the existing overhead distribution line that crosses the northern portion of the project site would be relocated underground.

Option 1

Under the warehouse option (Option 1), project buildings would range from 24,397 to 254,080 square feet and would stand up to 75 feet above finished grade. The proposed project's buildings would have a floor area ratio (FAR) ranging from 0.16 ~~0.22~~ to 0.37—a similar amount of lot coverage relative to other developed sites in the Napa County Airport Industrial Area. The proposed warehouse buildings would employ concrete tilt-up panel construction and feature architectural detailing consisting of tinted glazing in aluminum frames, foam banding cornices, Mediterranean-style medallion details, Mediterranean-style false overflow drain pipes, and large-scale false barn doors; refer to Exhibit 2-5a and Exhibit 2-5b. Overall, the proposed project would have similar uses, lot coverage, and building materials as other properties in the Napa County Airport Industrial Area (including the Napa Logistics Park Phase 1 building currently under construction to the west) and would therefore be compatible from a visual character perspective.

Option 2

Under the gas station/restaurant option (Option 2), project buildings would range from 7,078 ~~6,688~~ to 254,080 square feet in size and stand up to 75 feet above finished grade. The proposed warehouse buildings would have an FAR of 0.37—a similar amount of lot coverage relative to other developed sites in the Napa County Airport Industrial Area—and within the Specific Plan's allowable FAR of 0.50 for warehouse uses. The proposed warehouse buildings would employ concrete tilt-up panel construction and feature architectural detailing consisting of tinted glazing in aluminum frames, foam banding cornices, Mediterranean-style medallion details, Mediterranean-style false overflow drain pipes, and large-scale false barn doors.

The gas station, convenience market, and restaurant buildings would total 7,078 ~~6,688~~ square feet and would have an FAR of 0.04 ~~0.06~~. This would be within the Specific Plan's allowable FAR of 0.35 for non-warehouse uses. The gas station would have eight pumps under a canopy (up to 20 feet, 1 inch above finished grade), a freestanding convenience market (up to 25 feet, 1 inch above finished grade), and a car wash (up to 25 feet above finished grade): structures that would employ contemporary architecture (e.g., stucco, stone veneer, stone lintel, and slate roof); refer to Exhibit 2 6a through 2-6c. The restaurant would be a single-story building that would stand as tall as 21 feet above finished grade and would employ contemporary architecture (e.g., stucco, stone veneer, stone lintel, and slate roof); refer to Exhibit 2-6d.

Section 3.2, Air Quality/Greenhouse Gas Emissions

Page 3.2-32, Project Impacts and Mitigation

A statement has been added noting that the air quality/greenhouse gas emissions analysis is based on the higher square footages listed in the Draft EIR.

> The impact analysis in this section is based on the higher project square footages listed in the Draft EIR. Although the Final EIR updates the project description to reduce the project square footages, the analysis in this section conservatively relies on the higher square footage assumptions included in the Draft EIR.

Section 3.3, Biological Resources

Pages 3.3-31 and 3.3-32, Mitigation Measure BIO-2c

Mitigation Measure BIO-2c has been revised to reference the Swainson's hawk.

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

1) The project applicant shall delay construction in the vicinity of active nest sites during the breeding season (February 1 through September 15) while the nest is occupied with adults or young. A qualified biologist shall monitor any occupied nest to determine when the nest is no longer used. If the construction cannot be delayed, avoidance measures shall include the establishment of a non-disturbance buffer zone around the nest site. The buffer zone for non-raptor species shall be 250 feet, or as determined in consultation with CDFW. The buffer zone shall be delineated with highly visible temporary construction fencing.
2) No intensive disturbance (e.g., heavy equipment operation associated with construction, or use of cranes) or other project-related activities that could cause nest abandonment or forced fledging shall be initiated within the established buffer zone of an active nest between February 1 and September 15.
3) If construction activities are unavoidable within the buffer zone, the project proponent shall consult with CDFW and retain a qualified biologist to monitor the nest site to determine if construction activities are disturbing the adult or young birds. If disturbance is observed, the biologist shall have authority to stop construction within the buffer zone until the bird species have vacated the nest of their own accord.

4) If fully protected species (white-tailed kites, golden eagles) are found to be nesting near the proposed construction area, their nests shall be completely avoided until the birds fledge. Avoidance shall include the establishment of a non-disturbance buffer zone of 500 feet, or as determined in consultation with the CDFW.

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

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

Section 3.6, Hazards and Hazardous Materials

Page 3.6-11, Fourth Paragraph

The paragraph has been modified to reflect the altered square footages.

The proposed project consists of the development of either (a) 515,621 ~~571,808~~ square feet of warehouse and winery warehouse uses; or (b) 498,302 ~~554,099~~ square feet of warehouse, winery warehouse, and gas station/quick-serve restaurant uses.

Page 3.6-13, Third Paragraph

The paragraph has been modified to reflect the altered square footages.

The proposed project consists of the development of either (a) 515,621 ~~571,808~~ square feet of warehouse and winery warehouse uses; or (b) 498,302 ~~554,099~~ square feet of warehouse, winery warehouse, and gas station/quick-serve restaurant uses.

Page 3.6-14, Last Paragraph

The paragraph has been modified to reflect the altered square footages.

The proposed project consists of the development of either (a) 515,621 ~~571,808~~ square feet of warehouse and winery warehouse uses; or (b) 498,302 ~~554,099~~ square feet of warehouse, winery warehouse, and gas station/quick-serve restaurant uses.

Section 3.8, Land Use

Page 3.8-7, First Through Fifth Paragraphs

The discussion has been modified to reflect the altered square footages.

Option 1

The proposed project would consist of the development of 515,621 ~~571,808~~ square feet of warehouse or wine warehouse uses on 41.96 acres. The buildings would range from 24,397 ~~22,668~~ to 254,080 square feet in area and stand up to 41 feet, 6 inches feet above finished grade. The proposed project would have a FAR of 0.28 ~~0.26~~.

Option 1's end uses of warehouse or wine warehouse would be consistent with the types of permitted uses set forth in the General Plan. Additionally, the proposed FAR of 0.28 ~~0.26~~ would be within the General Plan's allowable FAR of 0.50 for labor-intensive uses and FAR of 0.70 for low labor uses.

Option 2

The proposed project would consist of the development of 498,302 ~~554,099~~ square feet of warehouse, wine warehouse, gas station, and restaurant uses on 41.96 net acres. The buildings would range from 7,078 ~~6,688~~ to 254,080 square feet in area and stand up to 41 feet, 6 inches feet above finished grade. The proposed project would have a FAR of 0.27 ~~0.25~~.

The warehouse and wine warehouse uses would be consistent with the types of permitted uses set forth in the General Plan. Additionally, the proposed FAR of the warehouses would be 0.37, which would be within the General Plan's allowable FAR of 0.50 for labor-intensive uses and FAR of 0.70 for low labor uses.

The gas station, convenience market, and restaurant would be consistent with the "supporting retail, restaurant, and financial, and similar uses" language set forth by the General Plan for the Industrial land use designation. The gas station, convenience market, and restaurant would develop a total of 7,078 ~~6,688~~ square feet of buildings and would have an FAR of 0.06, which would be within the General Plan's allowable FAR of 0.50 for labor-intensive uses and FAR of 0.70 for low labor uses.

Page 3.8-8, Table 3.8-2

The consistency analysis in Table 3.8-2 has been modified to reflect the altered square footage.

Table 3.8-2: General Plan Consistency Analysis

No.	Goal/Objective/Policy	
	Text	Consistency Determination
Goal 1A	Provide for a diversity of land uses that a. serve the needs of existing and future residents; b. capitalize upon the tourism and agricultural heritage of the region;	**Consistent:** The proposed project would develop up to 515,621 ~~571,808~~ square feet of warehouse and wine warehouse uses on the 41.96-net-acre project site. (As an alternative,

Table 3.8-2 (cont.): General Plan Consistency Analysis

No.	Goal/Objective/Policy	
	Text	**Consistency Determination**
	c. capitalize upon and preserves the unique environmental resources and character of the area; d. offer sustained employment opportunities for residents of the City and the surrounding region; e. sustain and enhance the long term economic viability of the City; f. revitalize areas of physical and economic deterioration and/or obsolescence; g. are developed at densities/intensities that are economically viable and complementary with the natural environmental setting and existing development; and h. provide a greater balance of jobs and housing.	a 24,397-square-foot warehouse building may be replaced with a gas station, convenience market, and restaurant totaling 7,078 ~~6,688~~ square feet.) The project site is designated "Industrial" by the General Plan and the end uses are consistent with the allowable uses for this land use designation. As such, the proposed project would be consistent with the provisions of this goal, including serving the needs of residents, protecting environmental resources, creating employment opportunities, and balancing jobs and housing.
Objective 1.1	Accommodate the development of a balance of land uses that (a) provide for the housing, commercial, employment, educational, cultural, entertainment, and recreation needs of residents, (b) capture visitor and tourist activity, (c) provide employment opportunities for residents of the greater sub region; and (d) provide open space and aesthetic relief from developed urban/suburban areas.	**Consistent:** The proposed project would develop up to 515,621 ~~571,808~~ square feet of warehouse and wine warehouse uses on the 41.96-net-acre project site. (As an alternative, a 24,397-square-foot warehouse building may be replaced with a gas station, convenience market, and restaurant totaling 7,078 ~~6,688~~ square feet.) The project would create as many as 287 new jobs, primarily for residents of the region.

Page 3.8-9, Table 3.8-2

The consistency analysis in Table 3.8-2 has been modified to reflect the altered square footage.

Table 3.8-2: General Plan Consistency Analysis

No.	Goal/Objective/Policy	
	Text	**Consistency Determination**
Goal 1B	Provide for the orderly development of American Canyon that maintains its distinctive character.	**Consistent:** The proposed project would develop up to 515,621 ~~571,808~~ square feet of warehouse and wine warehouse uses on the 41.96-net-acre project site. (As an alternative, a 24,397-square-foot warehouse building may be replaced with a gas station, convenience market, and restaurant totaling 7,078 ~~6,688~~ square feet.) The project site is located within the Napa County Airport Industrial Area and is surrounded by urban uses and infrastructure on four sides. As such, it is well suited for new development and would advance the goal of orderly development that maintains American Canyon's distinctive character.

Table 3.8-2 (cont.): General Plan Consistency Analysis

No.	Goal/Objective/Policy	
	Text	Consistency Determination
Objective 1.2	Promote a rate of growth that is consistent with the ability of the City to provide adequate infrastructure and services and does not adversely impact the distinctive character and quality of life in American Canyon.	**Consistent:** The proposed project would develop up to 515,621 ~~571,808~~ square feet of warehouse and wine warehouse uses on the 41.96-net-acre project site. (As an alternative, a 24,397-square-foot warehouse building may be replaced with a gas station, convenience market, and restaurant totaling 7,078 ~~6,688~~ square feet.) The project site is located within the Napa County Airport Industrial Area and is surrounded by urban uses and infrastructure on four sides. Thus, the project would occur in an area where adequate infrastructure and services exists such that it would not exceed the City's ability to serve it.

Page 3.8-12, Table 3.8-2

The consistency analysis in Table 3.8-2 has been modified to reflect the altered square footage.

Table 3.8-2: General Plan Consistency Analysis

No.	Goal/Objective/Policy	
	Text	Consistency Determination
Goal 1I	Ensure the development of industrial uses that provide employment for residents of American Canyon and the surrounding region and contribute significant revenue for the City.	**Consistent:** The proposed project would develop up to 515,621 ~~571,808~~ square feet of warehouse and wine warehouse uses on the 41.96-net-acre project site. (As an alternative, a 24,397-square-foot warehouse building may be replaced with a gas station, convenience market, and restaurant totaling 7,078 ~~6,688~~ square feet.) The project is estimated to create as many as 287 new jobs for local residents. As such, it would advance the goal of providing employment opportunities and contributing significant revenue for the City.
Objective 1.22	Provide for the continuation of existing and development of new industries that capitalize upon the geographic advantages of the City (including adjacency to Napa County Airport and the railroad), the agricultural production of the region, and emerging types of businesses (such as "thematic" and "environmental" based	**Consistent:** The project site is located within the Napa County Airport Industrial Area and is designated for industrial development. The proposed project would develop up to 515,621 ~~571,808~~ square feet of warehouse and wine warehouse uses on the 41.96-net-acre project site. (As an alternative, a 24,397-square-foot

Table 3.8-2 (cont.): General Plan Consistency Analysis

No.	Goal/Objective/Policy	
	Text	Consistency Determination
	industries), offer opportunities for the clustering of key economic sectors, and maintain the environmental quality of the City.	warehouse building may be replaced with a gas station, convenience market, and restaurant totaling 7,078 ~~6,688~~ square feet.) This is consistent with the objective of promoting the development of existing and new industries that capitalize on the geographic advantages of the City.

Page 3.8-13, Table 3.8-2

The consistency analysis in Table 3.8-2 has been modified to reflect the altered square footage.

Table 3.8-2: General Plan Consistency Analysis

No.	Goal/Objective/Policy	
	Text	Consistency Determination
Policy 1.22.1	Accommodate the continuation of existing and development of new manufacturing, research and development, warehouse and distribution, ancillary offices, and similar uses in areas designated as "Industrial (I)" on the Land Use Plan Map (Figure 1-1).	**Consistent:** The project site is located within the Napa County Airport Industrial Area and is designated for industrial development. The proposed project would develop up to 515,621 ~~571,808~~ square feet of warehouse and wine warehouse uses on the 41.96-net-acre project site. (As an alternative, a 24,397-square-foot warehouse building may be replaced with a gas station, convenience market, and restaurant totaling 7,078 ~~6,688~~ square feet.) This is consistent with the policy of promoting the development of existing and new warehouse and distribution, and similar uses in areas designated as "Industrial (I)" on the Land Use Plan Map (Figure 1-1).
Policy 1.22.2	Allow for the inclusion of businesses that are ancillary to and support industrial uses such as related retail sales facilities for manufacturers, financial institutions, restaurants, photocopy shops, specialty recreational uses (batting cages and health clubs/spas), and similar uses.	**Consistent:** The proposed project would develop up to 515,621 ~~571,808~~ square feet of warehouse and wine warehouse uses on the 41.96-net-acre project site. (As an alternative, a 24,397-square-foot warehouse building may be replaced with a gas station, convenience market, and restaurant totaling 7,078 ~~6,688~~ square feet.) The gas station, convenience market, and restaurant would be primarily business park serving and, thus, "ancillary" and consistent with the intent of this policy.

Page 3.8-15, Table 3.8-2

The consistency analysis in Table 3.8-2 has been modified to reflect the altered square footage.

Table 3.8-2: General Plan Consistency Analysis

No.	Goal/Objective/Policy	
	Text	Consistency Determination
Goal 1R	Ensure a high quality of the City's built environment, architecture, landscape, and public open spaces.	**Consistent:** The proposed project would develop up to 515,621 ~~571,808~~ square feet of warehouse and wine warehouse uses on the 41.96-net-acre project site. (As an alternative, a 24,397-square-foot warehouse building may be replaced with a gas station, convenience market, and restaurant totaling 7,078 ~~6,688~~ square feet.) As shown in Exhibits 2-5(a-b) and 2-6(a-d), project buildings would employ contemporary architecture and site design concepts that are similar to those employed elsewhere in the Napa County Airport Industrial Area. Additionally, landscaping would be provided along the Devlin Road and S. Kelly Road frontages. These attributes would advance the goal of providing a high-quality built environment and open space.

Page 3.8-17, Table 3.8-2

The consistency analysis in Table 3.8-2 has been modified to reflect the altered square footage.

Table 3.8-2: General Plan Consistency Analysis

No.	Goal/Objective/Policy	
	Text	Consistency Determination
Goal 3	Provide for the economic needs of American Canyon residents by capitalizing on the marketability of the City's industrial land and promoting a mix of uses which create quality jobs and foster fiscal stability.	**Consistent:** The proposed project would develop up to 515,621 ~~571,808~~ square feet of warehouse and wine warehouse uses on the 41.96-net-acre project site in the Napa Airport Industrial Area. (As an alternative, a 24,397-square-foot warehouse building may be replaced with a gas station, convenience market, and restaurant totaling 7,078 ~~6,688~~ square feet.) The project would create as many as 287 new jobs, stimulate capital investment, and expand the tax base. These characteristics are consistent with the goal of providing for the economic needs of American Canyon residents.

Page 3.8-18, Table 3.8-2

The consistency analysis in Table 3.8-2 has been modified to reflect the altered square footage.

Table 3.8-2: General Plan Consistency Analysis

No.	Goal/Objective/Policy	
	Text	Consistency Determination
Objective 3.1	Maximize the City's market potential in terms of industrial/business park and community-serving commercial activity. Increased industrial activity can be a catalyst for broadening the City's economic base by providing quality jobs and tax revenues, as well as, stimulating infrastructure improvements.	**Consistent:** The proposed project would develop up to 515,621 ~~571,808~~ square feet of warehouse and wine warehouse uses on a 41.96-net-acre site in the Napa Airport Industrial Area. (As an alternative, a 24,397-square-foot warehouse building may be replaced with a gas station, convenience market, and restaurant totaling 7,078 ~~6,688~~ square feet.) The project would create as many as 287 new jobs, stimulate capital investment, and expand the tax base. These characteristics are consistent with the objective of maximizing the City's market potential in terms of industrial/business park activity.
Policy 3.1.1	Adopt a Land Use Map which designates acreage for heavy industrial, light industrial/business park, commercial, and recreational commercial activities.	**Consistent:** The project site is currently designated "Industrial" by the City of American Canyon General Plan and the proposed project's uses are consistent with the allowable uses of this land use designation.
Policy 3.1.3	Seek to expand the City's economic base and development opportunities through planned annexation program that is linked to the General Plan and Land Use Plan.	**Consistent:** The project site was previously annexed into the City of American Canyon in 2011, and the proposed project contemplates the development of up to 515,621 ~~571,808~~ square feet of warehouse and wine warehouse uses on a 41.96-net-acre site in the Napa Airport Industrial Area. (As an alternative, a 24,397-square-foot warehouse building may be replaced with a gas station, convenience market, and restaurant totaling 7,078 ~~6,688~~ square feet.) This is consistent with expanding the City's economic base and development opportunities through planned annexation program that is linked to the General Plan and Land Use Plan.

Page 3.8-19, Table 3.8-2

The consistency analysis in Table 3.8-2 has been modified to reflect the altered square footage.

Table 3.8-2: General Plan Consistency Analysis

No.	Goal/Objective/Policy	
	Text	Consistency Determination
Goal 3A	Generate new industrial growth through diversification of the industrial base and maintenance of current activity to provide employment opportunities for residents and generate fiscal revenues for the City.	**Consistent:** The proposed project would develop up to 515,621 ~~571,808~~ square feet of warehouse and wine warehouse uses on a 41.96-net-acre site in the Napa Airport Industrial Area. (As an alternative, a 24,397-square-foot warehouse building may be replaced with a gas station, convenience market, and restaurant totaling 7,078 ~~6,688~~ square feet.) This is consistent with the goal of generating new industrial growth through diversification of the industrial base.
Objective 3.4	Increase the number of firms within the industries now represented in the City and capture new, clean, nonpolluting industries that are stable and compatible with City needs in terms of traffic, air quality, and employment.	**Consistent:** The proposed project would develop up to 515,621 ~~571,808~~ square feet of warehouse and wine warehouse uses on a 41.96-net-acre site in the Napa Airport Industrial Area. (As an alternative, a 24,397-square-foot warehouse building may be replaced with a gas station, convenience market, and restaurant totaling 7,078 ~~6,688~~ square feet.) These types of uses currently exist within the Airport Industrial Area or are contemplated by the Specific Plan. Additionally, the proposed project is estimated to create 287 new jobs. The project would implement traffic improvements to mitigate for impacts on traffic operations.

Page 3.8-22, Table 3.8-2

The consistency analysis in Table 3.8-2 has been modified to reflect the altered square footage.

Table 3.8-2: General Plan Consistency Analysis

No.	Goal/Objective/Policy	
	Text	Consistency Determination
Guiding Policy 1.11	Reduce Vehicle Miles Traveled. Through layout of land uses, improved alternate modes, and provision of more direct routes, strive to reduce the total vehicle miles traveled by City residents.	**Consistent:** The project site is located within the Napa County Airport Industrial Area, which has convenient access to SR-12 and SR-29. The development of the proposed project's 515,621 ~~571,808~~ square feet of industrial uses would increase warehouse and distribution uses within the North Bay Region and would contribute to reducing

Table 3.8-2 (cont.): General Plan Consistency Analysis

No.	Goal/Objective/Policy	
	Text	Consistency Determination
		trip length by locating these facilities closer to customers within this region. Additionally, because American Canyon is "housing rich," locating new employment opportunities near housing would also promote the policy of reducing vehicle miles traveled.

Page 3.8-46, Last Paragraph and Pahe 3.8-47, First Through Third Paragraphs

The discussion has been modified to reflect the altered square footages.

Option 1

The proposed project would consist of the development of 515,621 ~~571,808~~ square feet of warehouse or wine warehouse uses on 41.96 net acres. The buildings would range from 22,668 to 254,080 square feet in area and stand up to 75 feet above finished grade.

Option 1's end uses of warehouse or wine warehouse would be consistent with the types of permitted uses set forth in the Specific Plan. Additionally, the proposed FAR of the warehouses would range from 0.16 ~~0.22~~ to 0.37, which would be within the Specific Plan's allowable FAR of 0.50 for warehouse uses. Project buildings that exceed 35 feet would require approval of a Use Permit, which is one of the discretionary approvals being sought by the applicant.

Option 2

The proposed project would consist of the development of 498,302 ~~554,099~~ square feet of warehouse, wine warehouse, gas station, and restaurant uses on 41.96 net acres. The buildings would range from 7,078 ~~6,688~~ to 254,080 square feet in size and stand up to 75 feet above finished grade.

The warehouse and wine warehouse are consistent with the types of permitted uses set forth in the General Plan. Additionally, the proposed FAR of the warehouses would range from 0.22 to 0.37, which would be within the Specific Plan's allowable FAR of 0.50 for warehouse uses. Warehouse buildings that exceed 35 feet would require approval of a Use Permit, which is one of the discretionary approvals being sought by the applicant.

Page 3.8-48, Table 3.8-3

Table 3.8-3 has been modified to reflect the altered square footages.

Table 3.8-3: Project Use Summary

Category	Use	Square Feet
Indoor	Buildings	515,621 ~~571,808~~ (11.8 ~~13.1~~ acres)
Outdoor	Parking, Driveways, Landscaping, etc.	1,258,884 (28.9 acres)
Source: Panattoni Development Company, Inc., 2016.		

Section 3.9, Noise

Page 3.9-13, Project Impacts and Mitigation

A statement has been added noting that the noise analysis is based on the higher square footages listed in the Draft EIR.

> The impact analysis in this section is based on the higher project square footages listed in the Draft EIR. Although the Final EIR updates the project description to reduce the project square footages, the analysis in this section conservatively relies on the higher square footage assumptions included in the Draft EIR.

Section 3.10, Public Services and Utilities

Page 3.10-14, Project Impacts and Mitigation

A statement has been added noting that the public services and utilities analysis is based on the higher square footages listed in the Draft EIR.

> The impact analysis in this section is based on the higher project square footages listed in the Draft EIR. Although the Final EIR updates the project description to reduce the project square footages, the analysis in this section conservatively relies on the higher square footage assumptions included in the Draft EIR.

Page 3.10-16, Second Paragraph

The paragraph has been revised to clarify the details of non-potable water provided by the Napa Logistics Park well.

> Potable water supply for the project would be provided by the City of American Canyon. Landscape irrigation would be supplied by recycled water, also from the City, via an existing supply pipe that runs along Devlin Road (Exhibit 3.10 1). This pipe is not currently connected to the City's recycled water distribution system, but that connection is planned as part of Phase 2 of the neighboring Napa Logistics Park project (currently in the final stages of permitting). Non-potable water from the Napa Logistics Park well is being used to irrigate landscaping along Devlin Road until the recycled water line connection is established. This well would not be available to serve the Napa Airport Corporate Center Project on an interim or permanent basis.~~Should the proposed project be constructed prior to the recycled water connection, landscape irrigation would be supplied by groundwater pumping from an~~

~~existing well on the Napa Logistics Park property in order to reduce demand on the City's potable water system.~~

Page 3.10-44, First Paragraph

The paragraph has been revised to note that only the first Napa Airport Corporate Center building could be served by the Napa Logistics Park interim private pump station.

The proposed project would be served with wastewater service provided by the City of American Canyon. The proposed project would connect to an existing wastewater line located within Devlin Road. The City is also working on the completion of the Devlin Road extension from its current terminus at the Napa Logistics Park site south to Green Island Road. As part of this roadway design, the extension of a new public sewer line south to the Green Island Road Sanitary Pump Station is being designed. If the public sewer line has not been completed within the planned Devlin Road segment by the time the project is completed, the proposed project would be required to make sewer system improvements to connect to the existing sewer system on Tower Road. ~~projectwould tie into an interim sewer pump station within the Napa Logistics Park Project site and use the existing 18-inch-diameter force main that connects to the Green Island Road Sanitary Pump Station until the new public line is operational. Effluent is ultimately conveyed from the Green Island Road Sanitary Pump Station to the City's wastewater treatment plant via existing pipelines.~~

Section 3.11, Transportation

Global

All references to "Napa County Transportation and Planning Agency (NCTPA)" have been changed to "Napa Valley Transportation Authority (NVTA)."

Exhibits

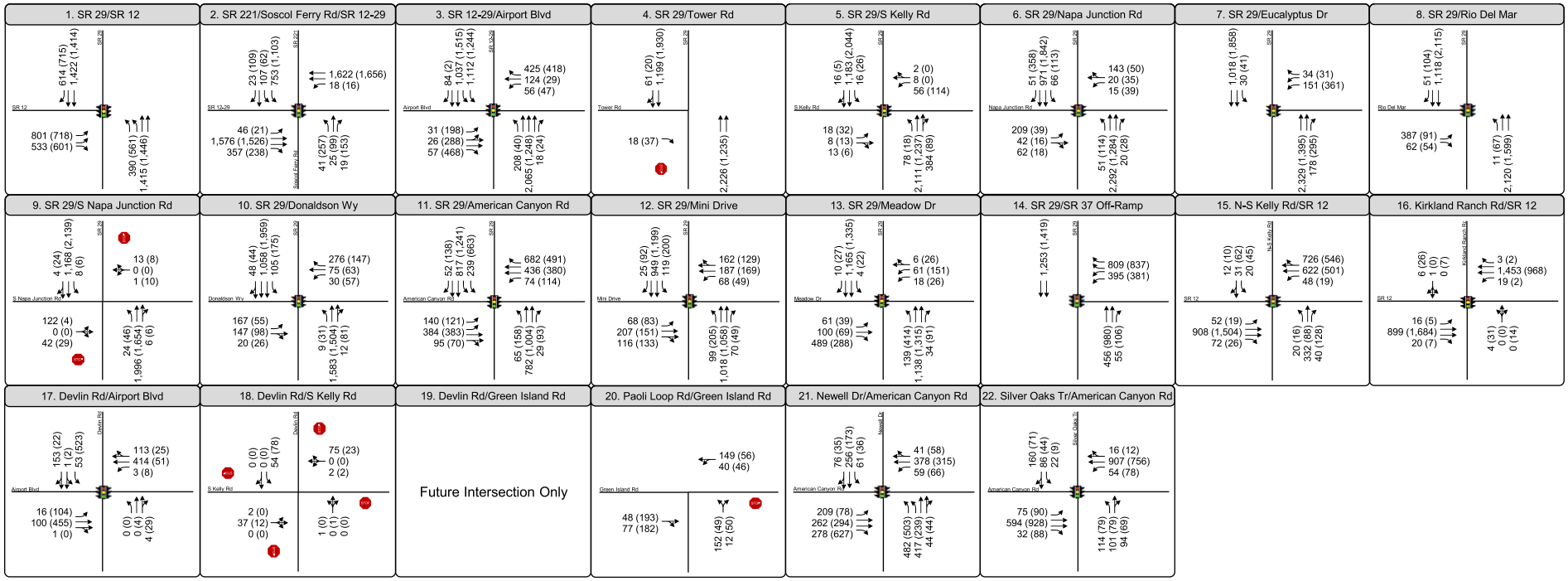
Exhibits 3.11-2, 3.11-7(a-b), 3.11-9, 3.11-10(a-b), 3.11-11, and 3.11-13(a-b) have been revised to provide corrected lane configurations.

Section 3.11, Transportation

Page 3.11-30, Trip Generation

A statement has been added noting that the transportation analysis is based on the higher square footages listed in the Draft EIR.

The impact analysis in this section is based on the higher project square footages listed in the Draft EIR. Although the Final EIR updates the project description to reduce the project square footages, the analysis in this section conservatively relies on the higher square footage assumptions included in the Draft EIR.



Source: Fehr & Peers, 2016

Exhibit 3.11-2
Peak Hour Traffic Volumes and Land Configurations
Existing (2015) Conditions

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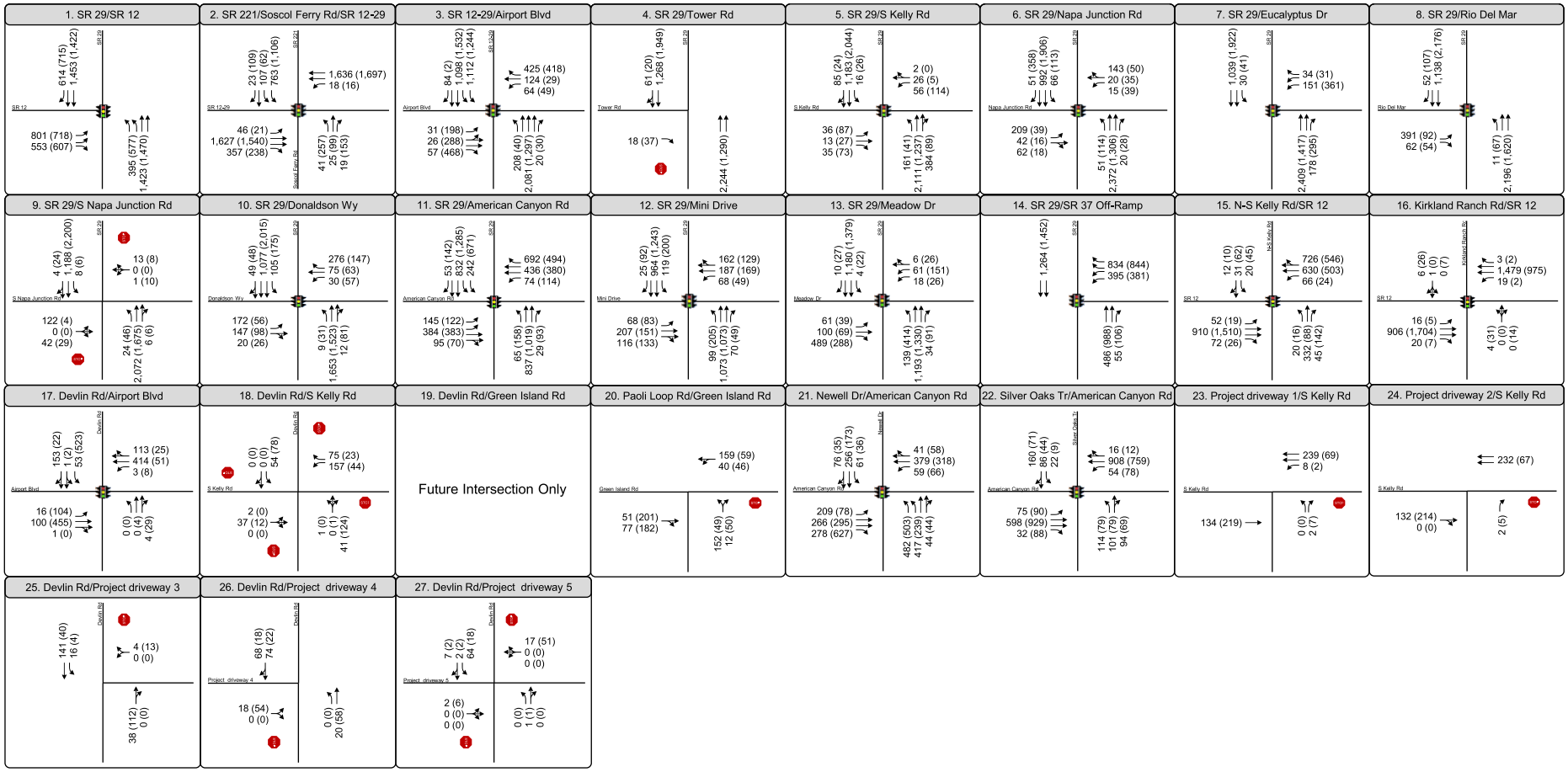

Source: Fehr & Peers, 2016

Exhibit 3.11-7a
Peak Hour Traffic Volumes and Lane Configurations
Existing Plus Project Option 1 (2015) Conditions

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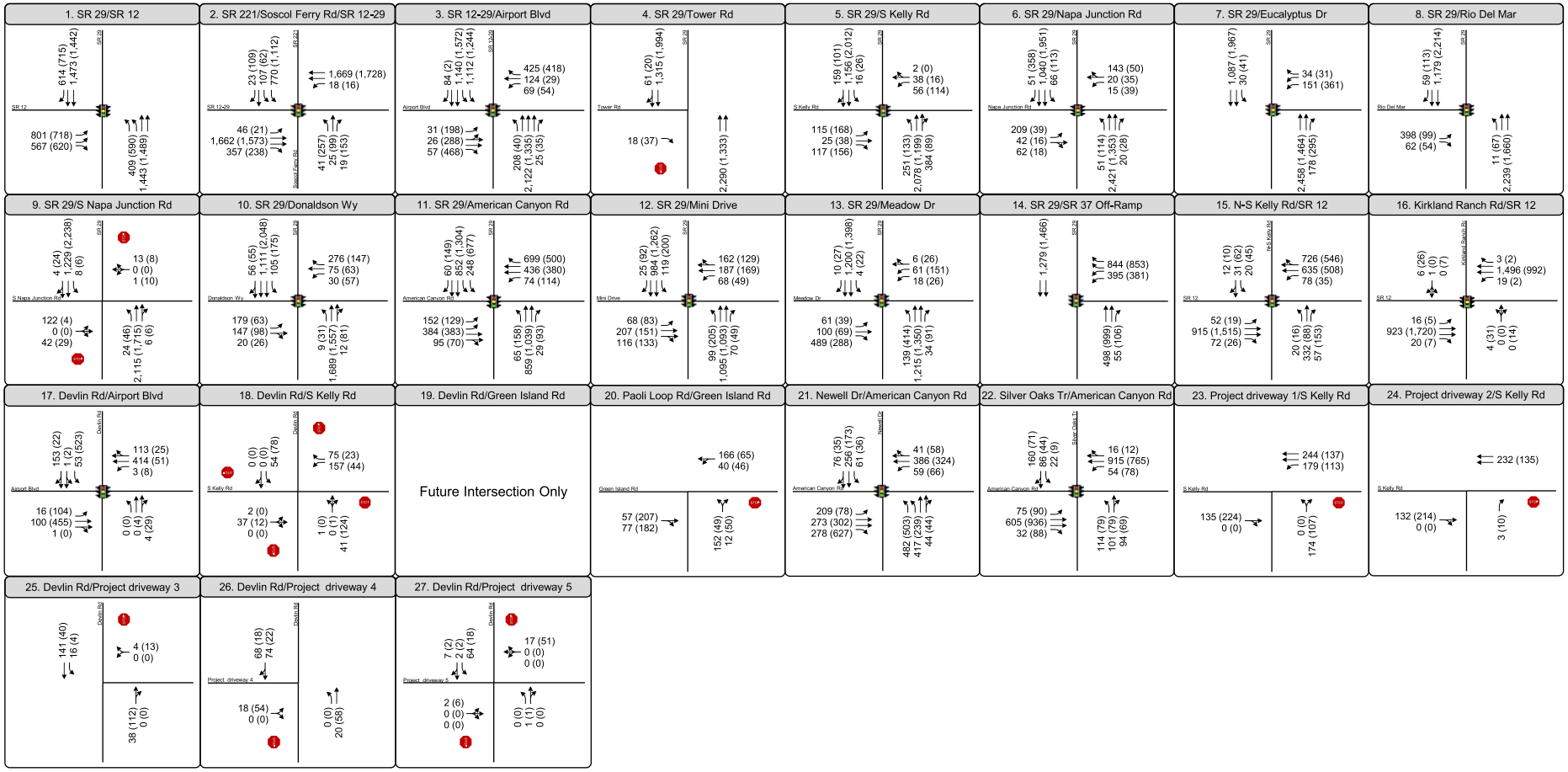

Source: Fehr & Peers, 2016

Exhibit 3.11-7b
Peak Hour Traffic Volumes and Lane Configurations
Existing Plus Project Option 2 (2015) Conditions

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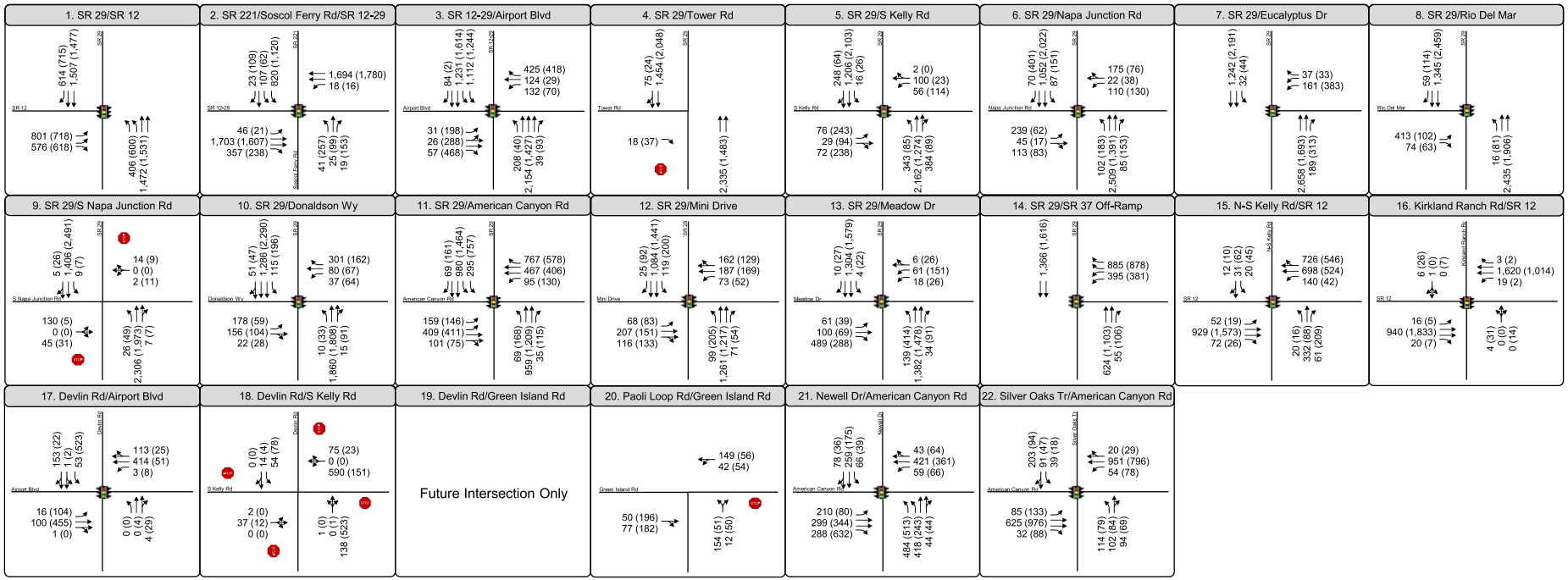

Source: Fehr & Peers, 2016

Exhibit 3.11-9
Peak Hour Traffic Volumes and Lane Configurations Existing Plus Background (2015) Conditions

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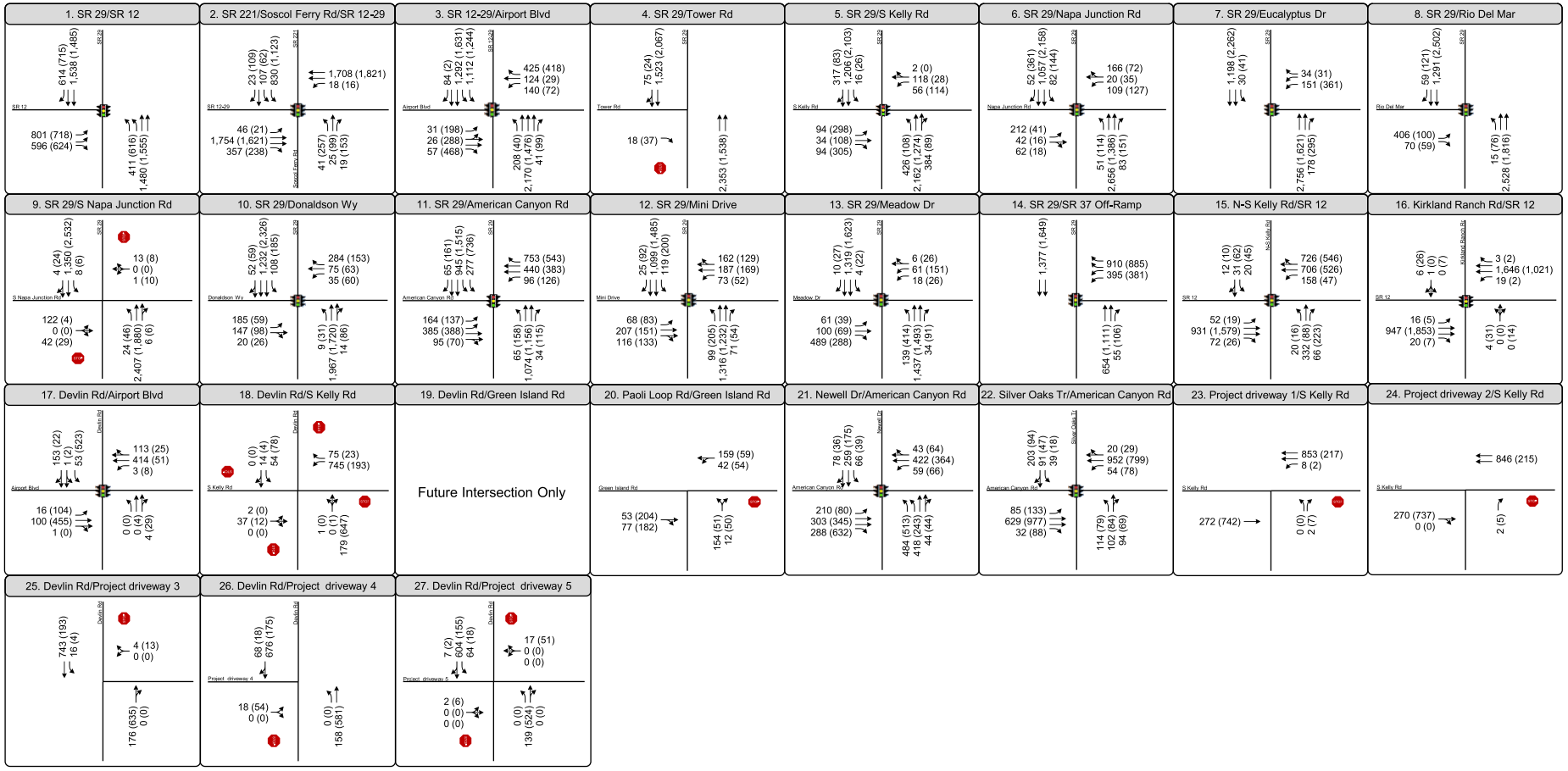

Source: Fehr & Peers, 2016

Exhibit 3.11-10a
Peak Hour Traffic Volumes and Lane Configurations
Existing Plus Background Plus Project Option 1 (No Devlin Extension) Conditions

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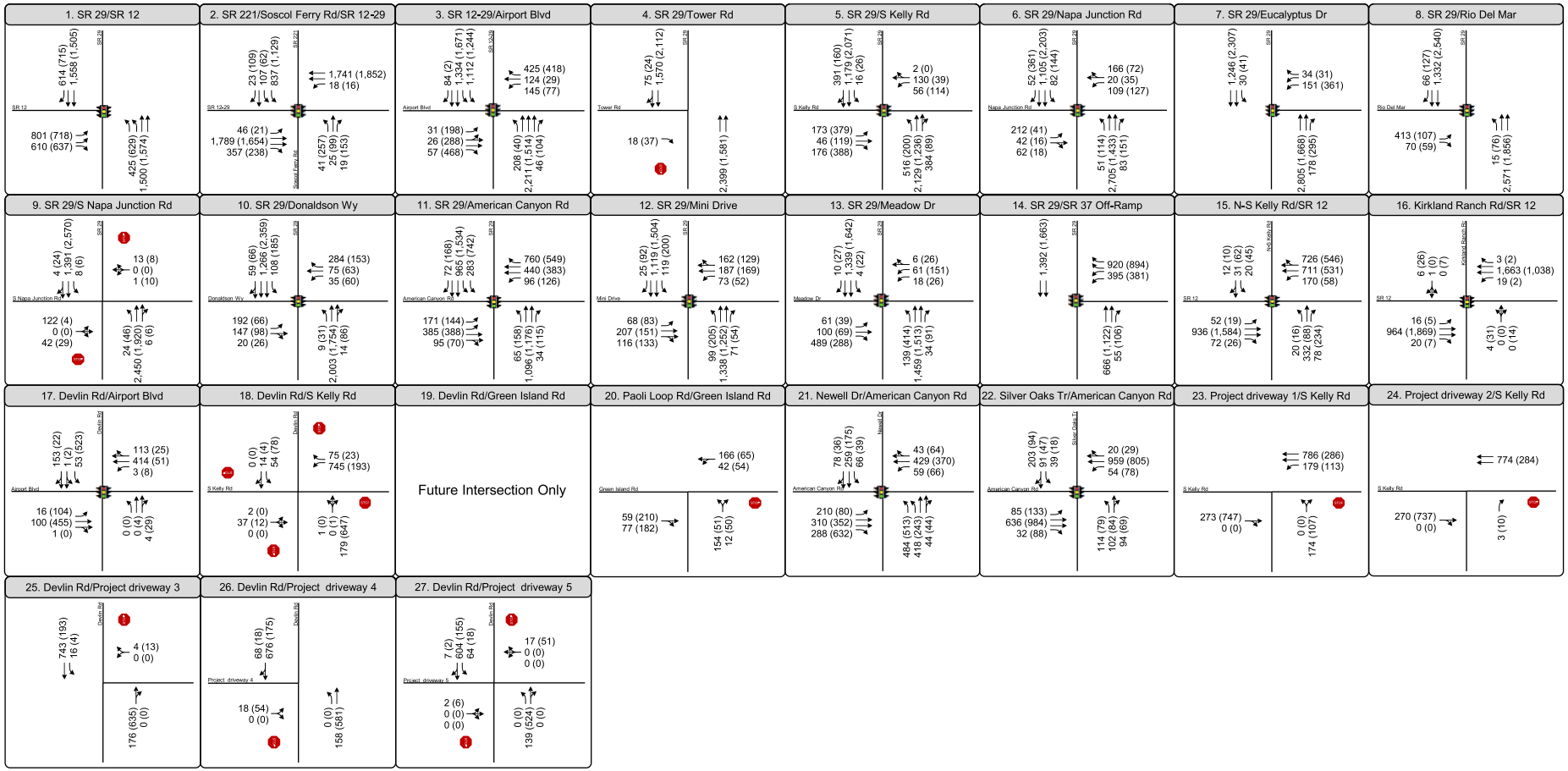

Source: Fehr & Peers, 2016

Exhibit 3.11-10b
Peak Hour Traffic Volumes and Lane Configurations
Existing Plus Background Plus Project Option 2 (No Devlin Extension) Conditions

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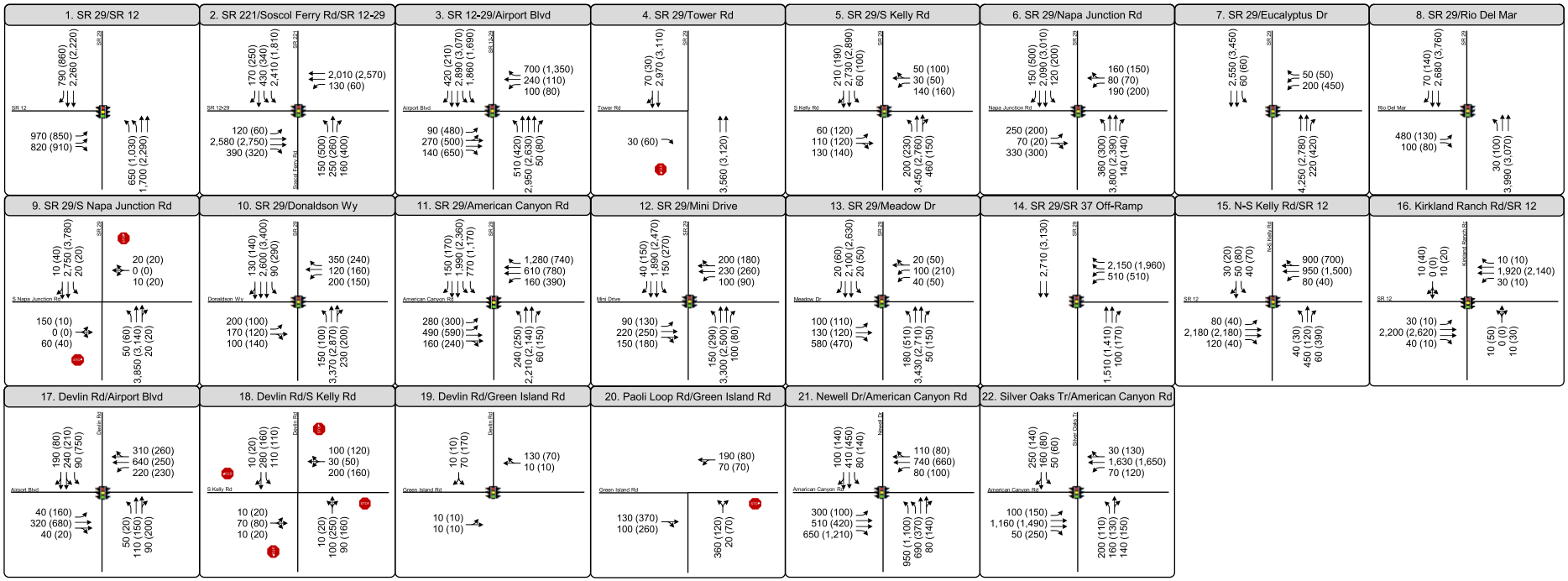

Source: Fehr & Peers, 2016

Exhibit 3.11-11
Peak Hour Traffic Volumes and Lane Configurations
Cumulative (2035) Conditions

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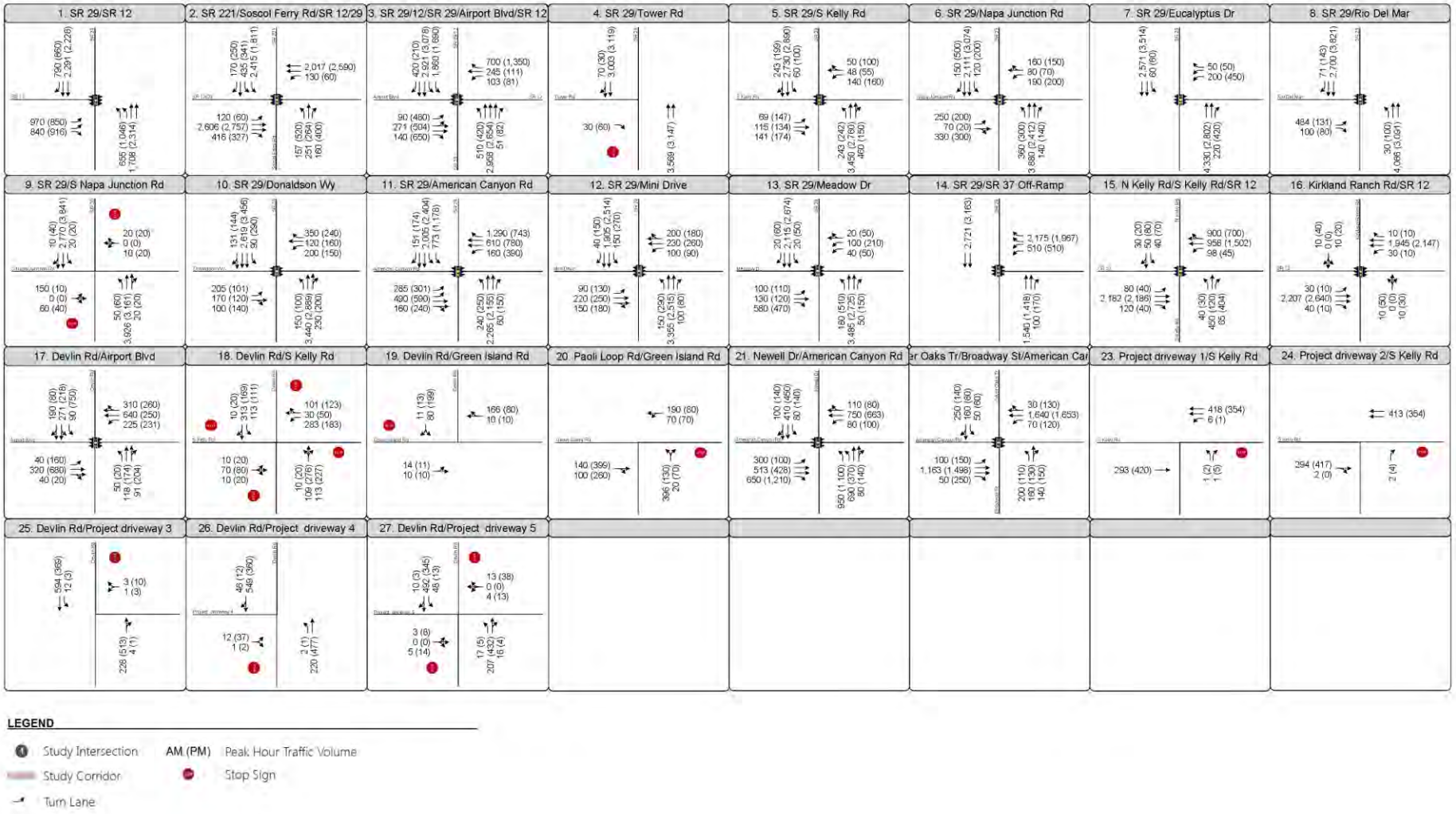

Source: Fehr & Peers, 2016

FirstCarbon® SOLUTIONS

Exhibit 3.11-13a
Peak Hour Traffic Volumes and Lane Configurations Cumulative Plus Project Option 1 (2035) Conditions

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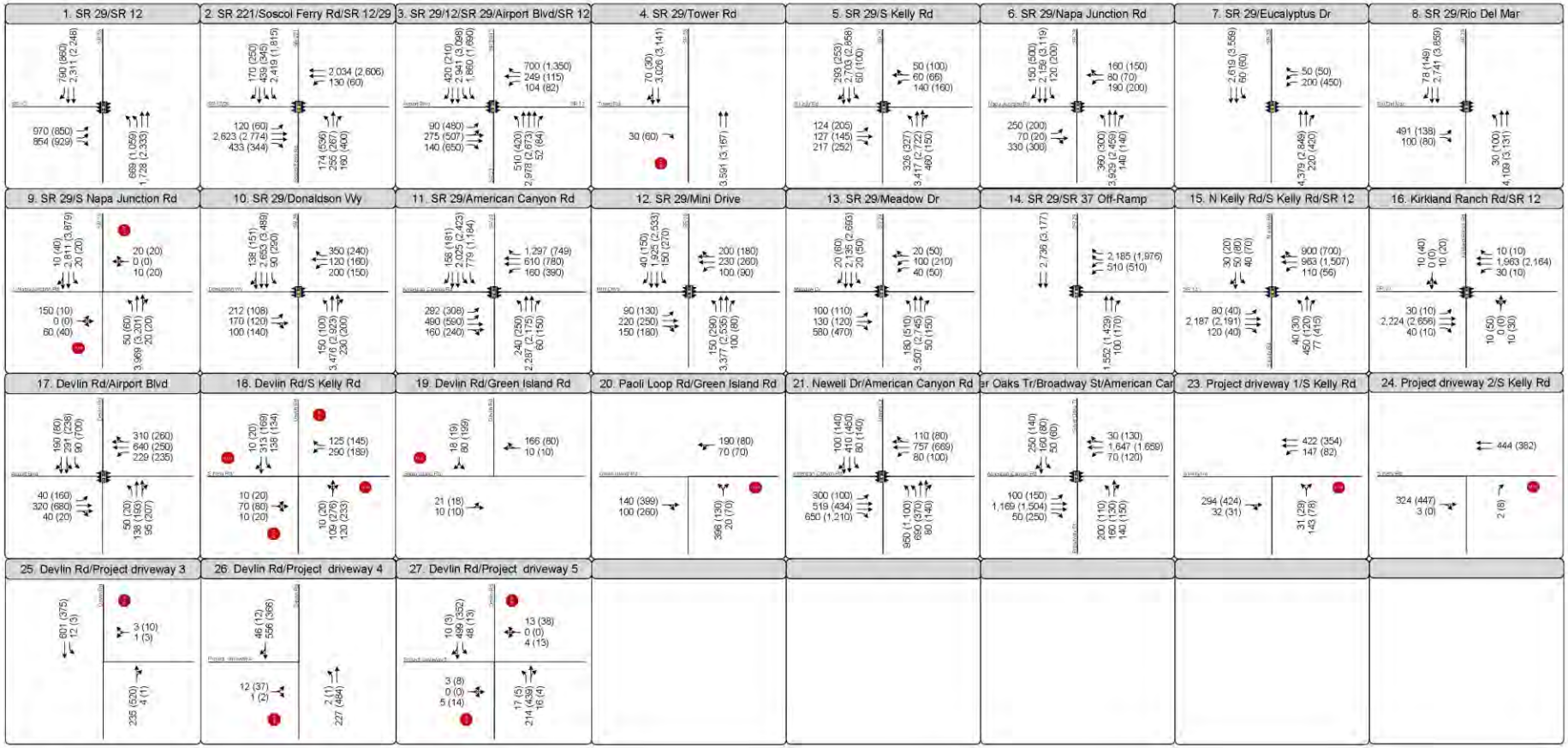

Source: Fehr & Peers, 2016

FirstCarbon® SOLUTIONS

Exhibit 3.11-13b
Peak Hour Traffic Volumes and Lane Configurations
Cumulative Plus Project Option 2 (2035) Conditions

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Page 3.11-53, After Mitigation Measure TRANS-1e

A new entry for Mitigation Measure TRANS-1f has been added.

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

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

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

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

The Applicant shall retain a transportation planning/engineering consultant to analyze the effectiveness of the TDM program in a written report. The TDM Report will include data collected from the permanent vehicle counting station and a determination of employee commute methods, which shall be informed by surveying all employees working at the site. The TDM Report shall be submitted to the City on a periodic on-going basis and it shall form the basis of on-going determinations by the City as to the effectiveness of the TDM program.

Page 3.11-68, Mitigation Measures

A reference to Mitigation Measure TRANS-1f has been added:

> ***Mitigation Measures***
>
> Implement Mitigation Measures TRANS-1a, TRANS-1b, TRANS-1c, TRANS-1d, TRANS-1e, TRANS-2f, and:

Page 3.11-88, Mitigation Measures

A reference to Mitigation Measure TRANS-1f has been added:

> ***Mitigation Measures***
>
> Implement Mitigation Measures TRANS-1a, TRANS-1b, TRANS-1c, TRANS-1d, TRANS-1e, TRANS-2f, and TRANS-2.

Page 3.11-92, Mitigation Measures

A reference to Mitigation Measure TRANS-1f has been added:

> ***Mitigation Measures***
>
> Implement Mitigation Measures TRANS-1a, TRANS-1b, TRANS-1c, ~~and~~ TRANS-1d, and TRANS-2f.

Section 4, Cumulative Effects

Page 4-12, Last Paragraph, First Sentence

The text has been modified to reflect the altered square footage.

> The proposed project would result in the development of up 515,621 ~~571,808~~ square feet of light industrial uses on 50 acres.

Section 5, Alternatives to the Proposed Project

Page 5-1, Introduction

A statement has been added noting that the alternatives analysis is based on the higher square footages listed in the Draft EIR.

> The impact analysis in this section is based on the higher project square footages listed in the Draft EIR. Although the Final EIR updates the project description to reduce the project square footages, the analysis in this section conservatively relies on the higher square footage assumptions included in the Draft EIR.

Page 3.11-9, Table 3.11-5

Table 3.11-5 has been revised with corrected Level of Service (LOS) values.

Table 3.11-5: Existing Intersection LOS

No.	Intersection[1]	Control	Peak Hour	DelXay[2]	LOS
1	SR-12/SR-29	Signal	AM	**39**	**D**
			PM	**38**	**D**
2	SR-12-29/SR-221-Soscol Ferry Road	Signal	AM	**59**	**E**
			PM	**>80**	**F**
3	Airport Boulevard/SR-12-29	Signal	AM	**>80**	**F**
			PM	**>80**	**F**
4	SR-29/Tower Rd	Side-Street Stop	AM	<10 (15)	A (B)
			PM	<10 (24)	A (C)
5	South Kelly Road/SR-29	Signal	AM	31	C
			PM	**n/a**	**F**
6	Napa Junction Road/SR-29	Signal	AM	28	C
			PM	**>80**	**F**
7	Eucalyptus Drive/SR-29	Signal	AM	<10	A
			PM	19	B
8	Rio Del Mar/SR-29	Signal	AM	19	B
			PM	18	B
9	South Napa Junction Road/Poco Way/SR-29	Side-Street Stop	AM	<10 (23)	A (C)
			PM	<10 (13)	A (B)
10	Donaldson Way/SR-29	Signal	AM	31	C
			PM	~~40~~ 46	D
11	American Canyon Road/SR-29	Signal	AM	33	C
			PM	~~52~~ 53	D
12	Mini Drive/SR-29	Signal	AM	24	C
			PM	27	C
13	Meadows Drive/SR-29	Signal	AM	24	C
			PM	38	D
14	SR-37 Westbound Off-Ramp/SR-29	Signal	AM	12	B
			PM	16	B
15	SR-12/North-South Kelly Road	Signal	AM	22	C
			PM	15	B

Table 3.11-5 (cont.): Existing Intersection LOS

No.	Intersection[1]	Control	Peak Hour	Delay[2]	LOS
16	SR-12/Kirkland Ranch Road	Signal	AM	<10	A
			PM	<10	A
17	Airport Boulevard/Devlin Road	Signal	AM	12	B
			PM	19	B
18	South Kelly Road/Devlin Road	All-Way Stop	AM	<10	A
			PM	<10	A
19	Green Island Road/Devlin Road (future intersection)	N/A	AM	-	n/a
			PM	-	n/a
20	Green Island Road/Paoli Loop Road	Side-Street Stop	AM	<10 (13)	A (B)
			PM	<10 (14)	A (B)
21	American Canyon Road/Newell Drive	Signal	AM	42	D
			PM	47	D
22	American Canyon Road/Silver Oaks Trail	Signal	AM	38	D
			PM	38	D

Notes:
[1] All intersections were analyzed using Synchro except intersections No. 6 through No. 11, which were analyzed using VISSIM.
[2] For signalized intersections, average intersection delay and LOS based on the 2000 HCM method is shown. For side-street stop-controlled intersections, delay and LOS for average intersection and (worst movement) delay are shown.
[3] **Bold** indicates unacceptable operations per jurisdiction standards.
Source: Fehr & Peers, 2015.

Page 3.11-11, Sixth Paragraph

The description of Route 11 has been revised to note that the nearest stop to the project site is at Airport Boulevard/Devlin Road and to correct the hours of operation.

> Route 11 operates between downtown Napa and downtown Vallejo, with the nearest stop at the intersection <u>of Airport Boulevard/Devlin Road.</u> ~~South Kelly Road and SR-29 approximately 0.5 mile from the site.~~ The route operates from <u>4:00 a.m.</u> ~~5:10 a.m.~~ to <u>9:20 p.m.</u> ~~8:00 p.m.~~ on weekdays, from 6:30 a.m. to 7:40 p.m. on Saturdays, and from 8:30 a.m. to 6:40 p.m. on Sundays.

Page 3.11-12, First Paragraph

The description of Route 29 has been revised to correct the hours of operation.

> Route 29 operates between Calistoga and El Cerrito del Norte BART along SR-29, with the nearest stop at the American Canyon post office approximately 2.4 miles from the site. The route operates from 4:40 a.m. to <u>8:45 p.m.</u> ~~7:00 p.m.~~ on weekdays only.

Page 3.11-12, Second Paragraph

The description of American Canyon Transit (ACT) has been amended to provide additional detail about the shuttle service.

> ~~As of March 2015,~~ ACT is a deviated, fixed-route bus service aimed at getting local residents to shopping and healthcare facilities within American Canyon. ACT connects to VINE Routes 11 and 29 and operates from 6:00 a.m. to 8:30 a.m. and 3:35 p.m. to 4:20 p.m. on weekdays to accommodate high school students. Outside of these times, the shuttle operates door-to-door between the hours of 8:30 a.m. and 5:00 p.m. on weekdays. ~~6:45 p.m. on weekdays only.~~ The route generally runs along Mini Drive, Broadway, American Canyon Road, Newell Drive, Donaldson Way, SR-29, Rio Del Mar, and Elliott Drive in a loop. The route runs in both the clockwise and counterclockwise directions.

Page 3.11-27, Last Paragraph and Page 3.11-28, First Paragraph

The summary of the Napa Valley Transportation Authority has been amended to note that the agency administers Measure T.

> ***Napa Valley Transportation Authority*** ~~***Napa County Transportation and Planning Agency***~~
>
> The NVTA ~~NCTPA~~ serves as the countywide transportation planning body for the incorporated and unincorporated areas of Napa County. The agency also administers Measure T. Since the County does not have a congestion management agency, NVTA ~~NCTPA~~ works with the MTC to prepare the Napa County portion of the RTP, which is a long-range development plan to allocate state and federal transportation funds. In 1999, the NVTA ~~NCTPA~~ adopted the Strategic Transportation Plan, which the NVTA ~~NCTPA~~ intended to be a long-range guide for decision making and funding of Napa County roadways, transit, and bicycle facilities. The Strategic Transportation Plan includes the following goals:

Page 3.11-45, Second-to-last paragraph

The second-to-last paragraph has been revised to reflect the changes to Table 3.11-8.

> Additionally, the models showed that each intersection along SR-29 between Napa Junction Road and American Canyon Road served ~~99~~ 96 to 100 percent of its demand in the AM peak hour and ~~93~~ 97 to ~~95~~ 98 percent of its demand in the PM peak hour ~~with implementation of a Transportation Demand Management Program~~. In other words, demand for the SR-29 corridor ~~is less than~~ is 0 to 4 percent over capacity during the AM peak hour and approximately ~~5~~ 2 to ~~7~~ 3 percent over capacity in the PM peak hour.

Page 3.11-46, Table 3.11-8

Table 3.11-8 has been revised with corrected LOS values.

Table 3.11-8: Existing and Existing Plus Project Intersection LOS

No.	Intersection[1]	Control	Peak Hour	Existing		Existing Plus Project Option 1		Existing Plus Project Option 2	
				Delay[2]	LOS	Delay[2]	LOS	Delay[2]	LOS
1	SR-12/SR-29	Signal	AM	**39**	**D**	**42**	**D**	**44**	**D**
			PM	**38**	**D**	**39**	**D**	**41**	**D**
2	SR-12-29/SR-221-Soscol Ferry Road	Signal	AM	**59**	**E**	**65**	**E**	**71**	**E**
			PM	**>80**	**F**	**>80**	**F**	**>80**	**F**
3	Airport Boulevard/ SR-12-29	Signal	AM	**>80**	**F**	**>80**	**F**	**>80**	**F**
			PM	**>80**	**F**	**>80**	**F**	**>80**	**F**
4	SR-29/Tower Rd	Side-Street Stop	AM	<10 (15)	A (B)	<10 (15)	A (C)	<10 (16)	A (C)
			PM	<10 (24)	A (C)	<10 (24)	A (C)	<10 (25)	A (C)
5	South Kelly Road/ SR-29	Signal	AM	31	C	32	C	**40**	**D**
			PM	**n/a**	**F**	**n/a**	**F**	**n/a**	**F**
6	Napa Junction Road/SR-29	Signal	AM	28	C	36	D	~~39~~ 35	D
			PM	**>80**	**F**	**>80**	**F**	**>80**	**F**
7	Eucalyptus Drive/SR-29	Signal	AM	<10	A	<10	A	<10	A
			PM	19	B	19	B	19	B
8	Rio Del Mar/SR-29	Signal	AM	19	B	~~18~~ 19	B	~~21~~ 23	C
			PM	18	B	17	B	17	B
9	South Napa Junction Road/ Poco Way/SR-29	Side-Street Stop	AM	<10 (23)	A (C)	<10 (~~25~~ 21)	A (~~D~~ C)	~~10~~ 12 (~~23~~ 28)	B (~~C~~ D)
			PM	<10 (13)	A (B)	<10 (14)	A (B)	<10 (15)	A (C)
10	Donaldson Way/ SR-29	Signal	AM	31	C	~~31~~ 28	C	**~~31~~ 39**	**~~C~~ D**
			PM	~~40~~ 46	D	~~40~~ 47	D	~~42~~ 47	D
11	American Canyon Road/SR-29	Signal	AM	33	C	34	C	~~34~~ 46	~~C~~ D
			PM	~~52~~ 53	D	~~50~~ 54	D	50	D
12	Mini Drive/SR-29	Signal	AM	24	C	25	C	25	C
			PM	27	C	27	C	28	C
13	Meadows Drive/ SR-29	Signal	AM	24	C	24	C	24	C
			PM	38	D	41	D	42	D
14	SR-37 Westbound Off-Ramp/SR-29	Signal	AM	12	B	12	B	13	B
			PM	16	B	17	B	17	B

Table 3.11-8 (cont.): Existing and Existing Plus Project Intersection LOS

No.	Intersection[1]	Control	Peak Hour	Existing		Existing Plus Project Option 1		Existing Plus Project Option 2	
				Delay[2]	LOS	Delay[2]	LOS	Delay[2]	LOS
15	SR-12/North-South Kelly Road	Signal	AM	22	C	23	C	23	C
			PM	15	B	15	B	16	B
16	SR-12/Kirkland Ranch Road	Signal	AM	<10	A	<10	A	<10	A
			PM	<10	A	<10	A	<10	A
17	Airport Boulevard/ Devlin Road	Signal	AM	12	B	12	B	12	B
			PM	19	B	19	B	19	B
18	South Kelly Road/ Devlin Road	All-Way Stop	AM	<10	A	<10	A	<10	A
			PM	<10	A	<10	A	<10	A
19	Green Island Road/ Devlin Road (future intersection)	N/A	AM	—	—	—	—	—	—
			PM	—	—	—	—	—	—
20	Green Island Road/ Paoli Loop Road	Side-Street Stop	AM	<10 (13)	A (B)	<10 (13)	A (B)	<10 (13)	A (B)
			PM	<10 (14)	A (B)	<10 (14)	A (B)	<10 (14)	A (B)
21	American Canyon Road/Newell Drive	Signal	AM	42	D	42	D	42	D
			PM	47	D	47	D	47	D
22	American Canyon Road/Silver Oaks Trail	Signal	AM	38	D	38	D	38	D
			PM	38	D	39	D	40	D
23	Building A Driveway/ South Kelly Road	Side-Street Stop	AM	—	—	<10 (<10)	A (A)	<10 (10)	A (B)
			PM	—	—	<10 (10)	A (A)	<10 (11)	A (B)
24	Building B Driveway/ South Kelly Road	Side-Street Stop	AM	—	—	<10 (<10)	A (A)	<10 (<10)	A (A)
			PM	—	—	<10 (10)	A (A)	<10 (10)	A (A)
25	Devlin Rd/Building E North Driveway	Side-Street Stop	AM	—	—	<10 (<10)	A (A)	<10 (<10)	A (A)
			PM	—	—	<10 (<10)	A (A)	<10 (<10)	A (A)
26	Devlin Rd/Building H North Driveway	Side-Street Stop	AM	—	—	<10 (<10)	A (A)	<10 (<10)	A (A)
			PM	—	—	<10 (<10)	A (A)	<10 (<10)	A (A)
27	Devlin Rd/Building E/H South Driveway	Side-Street Stop	AM	—	—	<10 (10)	A (A)	<10 (10)	A (A)
			PM	—	—	<10 (<10)	A (A)	<10 (<10)	A (A)

Table 3.11-8 (cont.): Existing and Existing Plus Project Intersection LOS

No.	Intersection[1]	Control	Peak Hour	Existing		Existing Plus Project Option 1		Existing Plus Project Option 2	
				Delay[2]	LOS	Delay[2]	LOS	Delay[2]	LOS

Notes:
[1] All intersections were analyzed using Synchro except intersections No. 6 through No. 11, which were analyzed using VISSIM.
[2] For signalized intersections, average intersection delay and LOS based on the 2000 HCM method is shown. For side-street stop-controlled intersections, delay and LOS for average intersection and (worst movement) delay are shown.
[3] **Bold** indicates unacceptable operations per jurisdiction standards. **Bold and shading** indicates a significant impact.
Source: Fehr & Peers, 2015.

Page 3.11-54, Last paragraph

The last paragraph has been revised to reflect the changes to Table 3.11-10.

> Under Existing Plus Background Development Plus Project Option 2 conditions, ~~18~~ 17 of the 27 study intersections operate at acceptable levels of service during both the AM and PM peak hours. Therefore, the increase in delay associated with the addition of project traffic at these intersections is a less than significant impact.

Page 3.11-63, Last two paragraphs

The last two paragraphs have been revised to reflect the changes to Table 3.11-10.

> Without the project, the VISSIM model showed that each intersection along SR-29 between Napa Junction Road and American Canyon Road served ~~94~~ 90 to ~~97~~ 94 percent of its counted demand in the AM peak hour and 91 to 94 percent of its counted demand in the PM peak hour. In other words, demand for the SR-29 corridor is 6 to 10 percent over capacity in the AM peak hour and ~~3~~ 6 to ~~6~~ 9 percent over capacity in the PM peak hour.
>
> With the project, the VISSIM model showed that each intersection along SR-29 between Napa Junction Road and American Canyon Road served ~~88~~ 95 to ~~94~~ 97 percent of its counted demand in the AM peak hour and ~~88~~ 89 to ~~91~~ 93 percent of its counted demand in the PM peak hour. Demand for the SR-29 corridor is ~~6~~ 3 to ~~12~~ 5 percent over capacity in the AM peak hour and ~~9~~ 7 to ~~12~~ 11 percent over capacity in the PM peak hour.

Page 3.11-63, Table 3.11-10

Table 3.11-10 has been revised with corrected LOS values.

Table 3.11-10: Existing Plus Background Development and Existing Plus Background Plus Project Intersection LOS (No Devlin Extension)

No.	Intersection[1]	Control	Peak Hour	Existing Plus Background		Existing Plus Background Plus Project Option 1		Existing Plus Background Plus Project Option 2	
				Delay[2]	LOS	Delay[2]	LOS	Delay[2]	LOS
1	SR-12/SR-29	Signal	AM	**47**	**D**	**51**	**D**	**53**	**D**
			PM	**45**	**D**	**46**	**D**	**48**	**D**
2	SR-12-29/ SR-221-Soscol Ferry Road	Signal	AM	**>80**	**F**	**>80**	**F**	**>80**	**F**
			PM	**>80**	**F**	**>80**	**F**	**>80**	**F**
3	Airport Boulevard/ SR-12-29	Signal	AM	**>80**	**F**	**>80**	**F**	**>80**	**F**
			PM	**>80**	**F**	**>80**	**F**	**>80**	**F**
4	SR-29/Tower Rd	Side-Street Stop	AM	<10 (17)	A (C)	<10 (18)	A (C)	<10 (19)	A (C)
			PM	<10 (26)	A (D)	<10 (27)	A (D)	<10 (28)	A (D)
5	South Kelly Road/SR-29	Signal	AM	**49**	**D**	**65**	**E**	**>80**	**F**
			PM	**>80**	**F**	**>80**	**F**	**>80**	**F**
6	Napa Junction Road/SR-29	Signal	AM	**>80**	**F**	**>80**	**F**	**>80**	**F**
			PM	**>80**	**F**	**>80**	**F**	**>80**	**F**
7	Eucalyptus Drive/SR-29	Signal	AM	~~12~~ 16	B	~~12~~ 13	B	~~19~~ 18	B
			PM	~~25~~ 27	C	19	B	19	B
8	Rio Del Mar/ SR-29	Signal	AM	~~25~~ 28	C	~~19~~ 21	~~B~~ C	~~26~~ 25	C
			PM	23	C	18	B	18	B
9	South Napa Junction Road/ Poco Way/SR-29	Side-Street Stop	AM	~~19~~ 29 (41)	~~C~~ D (E)	~~18~~ 23 (**>50**)	C (**F**)	**>50** (**>50**)	**F** (**F**)
			PM	~~<10~~ 14 (~~21~~ **>50**)	~~A~~ B (**F**)	<10 (~~15~~ 22)	A (~~B~~ C)	<10 (17)	A (C)
10	Donaldson Way/ SR-29	Signal	AM	~~**39**~~ **>80**	~~**D**~~ **F**	~~35~~ 29	C	~~**52**~~ **39**	**D**
			PM	~~**50**~~ **>80**	~~**D**~~ **F**	~~**48**~~ **59**	~~**D**~~ **E**	~~**49**~~ **59**	~~**D**~~ **E**
11	American Canyon Road/ SR-29	Signal	AM	~~**51**~~ **47**	**D**	~~**42**~~ **43**	**D**	**45**	**D**
			PM	~~**58**~~ **>80**	~~**E**~~ **F**	**64**	**E**	**66**	**E**
12	Mini Drive/SR-29	Signal	AM	27	C	27	C	27	C
			PM	30	C	30	C	30	C
13	Meadows Drive/ SR-29	Signal	AM	25	C	25	C	26	C
			PM	**60**	**E**	**66**	**E**	**68**	**E**

Table 3.11-10 (cont.): Existing Plus Background Development and Existing Plus Background Plus Project Intersection LOS (No Devlin Extension)

No.	Intersection[1]	Control	Peak Hour	Existing Plus Background		Existing Plus Background Plus Project Option 1		Existing Plus Background Plus Project Option 2	
				Delay[2]	LOS	Delay[2]	LOS	Delay[2]	LOS
14	SR-37 Westbound Off-Ramp/SR-29	Signal	AM	14	B	15	B	15	B
			PM	19	B	20	B	20	B
15	SR-12/North-South Kelly Road	Signal	AM	25	C	26	C	26	C
			PM	17	B	18	B	18	B
16	SR-12/Kirkland Ranch Road	Signal	AM	<10	A	<10	A	<10	A
			PM	<10	A	<10	A	<10	A
17	Airport Boulevard/ Devlin Road	Signal	AM	12	B	12	B	12	B
			PM	19	B	19	B	19	B
18	South Kelly Road/ Devlin Road	All-Way Stop	AM	**>50**	**F**	**>50**	**F**	**>50**	**F**
			PM	21	C	**>50**	**F**	**>50**	**F**
19	Green Island Road/Devlin Road (future intersection)	N/A	AM	10	A	10	B	10	B
			PM	11	B	11	B	12	B
20	Green Island Road/Paoli Loop Road	Side-Street Stop	AM	<10 (13)	A (B)	<10 (13)	A (B)	<10 (14)	A (B)
			PM	<10 (14)	A (B)	<10 (14)	A (B)	<10 (14)	A (B)
21	American Canyon Road/ Newell Drive	Signal	AM	43	D	43	D	43	D
			PM	46	D	46	D	46	D
22	American Canyon Road/ Silver Oaks Trail	Signal	AM	42	D	41	D	41	D
			PM	49	D	49	D	49	D
23	Building A Driveway/South Kelly Road	Side-Street Stop	AM	—	—	<10 (10)	A (B)	<10 (12)	A (B)
			PM	—	—	<10 (16)	A (C)	<10 (22)	A (C)
24	Building B Driveway/South Kelly Road	Side-Street Stop	AM	—	—	<10 (10)	A (B)	<10 (10)	A (B)
			PM	—	—	<10 (16)	A (C)	<10 (16)	A (C)
25	Devlin Rd/ Building E North Driveway	Side-Street Stop	AM	—	—	<10 (<10)	A (A)	<10 (<10)	A (A)
			PM	—	—	<10 (13)	A (B)	<10 (13)	A (B)
26	Devlin Rd/ Building H North Driveway	Side-Street Stop	AM	—	—	<10 (18)	A (C)	<10 (18)	A (C)
			PM	—	—	<10 (18)	A (C)	<10 (18)	A (C)

Table 3.11-10 (cont.): Existing Plus Background Development and Existing Plus Background Plus Project Intersection LOS (No Devlin Extension)

No.	Intersection[1]	Control	Peak Hour	Existing Plus Background		Existing Plus Background Plus Project Option 1		Existing Plus Background Plus Project Option 2	
				Delay[2]	LOS	Delay[2]	LOS	Delay[2]	LOS
27	Devlin Rd/ Building E/H South Driveway	Side-Street Stop	AM	—	—	<10 (22)	A (C)	<10 (22)	A (C)
			PM	—	—	<10 (20)	A (C)	<10 (20)	A (C)

Notes:
[1] All intersections were analyzed using Synchro except intersections No. 6 through No. 11, which were analyzed using VISSIM.
[2] For signalized intersections, average intersection delay and LOS based on the 2000 HCM method is shown. For side-street stop-controlled intersections, delay and LOS for average intersection and (worst movement) delay are shown.
[3] **Bold** indicates unacceptable operations per jurisdiction standards. **Bold and shading** indicates a significant impact.
Source: Fehr & Peers, 2015.

Page 3.11-70, Second and third paragraphs

The second and third paragraphs have been revised to reflect the changes to Table 3.11-11.

> Without the project, the VISSIM model showed that each intersection along SR-29 between Napa Junction Road and American Canyon Road served 55 to 59 percent of its counted demand in the AM peak hour and 59 to ~~63~~ 60 percent of its counted demand in the PM peak hour. With the project, the VISSIM model showed that each intersection along SR-29 between Napa Junction Road and American Canyon Road served 52 to 57 percent of its counted demand in the AM peak hour and 57 to ~~61~~ 59 percent of its counted demand in the PM peak hour.
>
> The results of the simulations show that SR-29 (as a four-lane facility) serves far less than the total demand without the project. Additionally, with or without the project, ~~the same~~ a similar amount of northbound and southbound through traffic vehicles is served. The project adds only northbound and southbound through traffic at these intersections. Delay does not increase in the VISSIM models at most of the study intersections, because the additional vehicles generated by the project cannot get to the intersections.

Page 3.11-70, Table 3.11-11

Table 3.11-11 has been revised with corrected LOS values.

Table 3.11-11: Cumulative and Cumulative Plus Project Intersection LOS

No.	Intersection[1]	Control	Peak Hour	Cumulative		Cumulative Plus Project Option 1		Cumulative Plus Project Option 2	
				Delay[2]	LOS	Delay[2]	LOS	Delay[2]	LOS
1	SR-12/SR-29	Signal	AM	**>80**	**F**	**>80**	**F**	**>80**	**F**
			PM	**>80**	**F**	**>80**	**F**	**>80**	**F**
2	SR-12-29/ SR-221-Soscol Ferry Road	Signal	AM	**>80**	**F**	**>80**	**F**	**>80**	**F**
			PM	**>80**	**F**	**>80**	**F**	**>80**	**F**
3	Airport Boulevard/ SR-12-29	Signal	AM	**>80**	**F**	**>80**	**F**	**>80**	**F**
			PM	**>80**	**F**	**>80**	**F**	**>80**	**F**
4	SR-29/Tower Rd	Side-Street Stop	AM	<10 (>50)	A **(F)**	<10 (>50)	A **(F)**	<10 (>50)	A **(F)**
			PM	<10 (>50)	A **(F)**	<10 (>50)	A **(F)**	<10 (>50)	A **(F)**
5	South Kelly Road/ SR-29	Signal	AM	**>80**	**F**	**>80**	**F**	**>80**	**F**
			PM	**>80**	**F**	**>80**	**F**	**>80**	**F**
6	Napa Junction Road/SR-29	Signal	AM	**>80**	**F**	**>80**	**F**	**>80**	**F**
			PM	**>80**	**F**	**>80**	**F**	**>80**	**F**
7	Eucalyptus Drive/ SR-29	Signal	AM	25	C	25	C	25	C
			PM	**>80**	**F**	**>80**	**F**	**>80**	**F**
8	Rio Del Mar/ SR-29	Signal	AM	38	D	39	D	38	D
			PM	~~36~~ 38	D	37	D	~~36~~ 37	D
9	South Napa Junction Road/ Poco Way/SR-29	Side-Street Stop	AM	**>50** (**>50**)	**F** (**F**)	**>50** (**>50**)	**F** (**F**)	**>50** (**>50**)	**F** (**F**)
			PM	~~30~~ 32 (**>50**)	D (**F**)	~~35~~ 31 (**>50**)	C (**F**)	29 (**>50**)	C (**F**)
10	Donaldson Way/ SR-29	Signal	AM	**>80**	**F**	**>80**	**F**	**>80**	**F**
			PM	**>80**	**F**	**>80**	**F**	**>80**	**F**
11	American Canyon Road/ SR-29	Signal	AM	**>80**	**F**	**>80**	**F**	**>80**	**F**
			PM	**>80**	**F**	**>80**	**F**	**>80**	**F**
12	Mini Drive/SR-29	Signal	AM	**>80**	**F**	**>80**	**F**	**>80**	**F**
			PM	**>80**	**F**	**>80**	**F**	**>80**	**F**
13	Meadows Drive/ SR-29	Signal	AM	**>80**	**F**	**>80**	**F**	**>80**	**F**
			PM	**>80**	**F**	**>80**	**F**	**>80**	**F**
14	SR-37 Westbound Off-Ramp/SR-29	Signal	AM	**>80**	**F**	**>80**	**F**	**>80**	**F**
			PM	**>80**	**F**	**>80**	**F**	**>80**	**F**

Table 3.11-11 (cont.): Cumulative and Cumulative Plus Project Intersection LOS

No.	Intersection[1]	Control	Peak Hour	Cumulative		Cumulative Plus Project Option 1		Cumulative Plus Project Option 2	
				Delay[2]	LOS	Delay[2]	LOS	Delay[2]	LOS
15	SR-12/North-South Kelly Road	Signal	AM	**77**	**E**	**>80**	**F**	**>80**	**F**
			PM	**69**	**E**	**75**	**E**	**>80**	**F**
16	SR-12/Kirkland Ranch Road	Signal	AM	<10	A	<10	A	11	B
			PM	25	C	26	C	27	C
17	Airport Boulevard/ Devlin Road	Signal	AM	24	C	24	C	26	C
			PM	**57**	**E**	**62**	**E**	**62**	**E**
18	South Kelly Road/ Devlin Road	All-Way Stop	AM	20	C	25	D	27	D
			PM	**>50**	**F**	**>50**	**F**	**>50**	**F**
19	Green Island Road/Devlin Road (future intersection)	N/A	AM	<10 (<10)	A (A)	<10 (<10)	A (A)	<10 (<10)	A (A)
			PM	<10 (<10)	A (A)	<10 (10)	A (B)	<10 (11)	A (B)
20	Green Island Road/Paoli Loop Road	Side-Street Stop	AM	23 **(50)**	C **(E)**	33 **(>50)**	D **(F)**	33 **(>50)**	D **(F)**
			PM	10 **(47)**	A **(E)**	13 **(>50)**	B **(F)**	13 **(>50)**	B **(F)**
21	American Canyon Road/ Newell Drive	Signal	AM	**>80**	**F**	**>80**	**F**	**>80**	**F**
			PM	**>80**	**F**	**>80**	**F**	**>80**	**F**
22	American Canyon Road/ Silver Oaks Trail	Signal	AM	**>80**	**F**	**>80**	**F**	**>80**	**F**
			PM	**77**	**E**	**78**	**E**	**78**	**E**
23	Building A Driveway/South Kelly Road	Side-Street Stop	AM	—	—	<10 (12)	A (B)	<10 (16)	A (C)
			PM	—	—	<10 (12)	A (B)	<10 (17)	A (C)
24	Building B Driveway/South Kelly Road	Side-Street Stop	AM	—	—	<10 (10)	A (B)	<10 (12)	A (B)
			PM	—	—	<10 (12)	A (B)	<10 (13)	A (B)
25	Devlin Rd/ Building E North Driveway	Side-Street Stop	AM	—	—	<10 (12)	A (B)	<10 (12)	A (B)
			PM	—	—	<10 (14)	A (B)	<10 (14)	A (B)
26	Devlin Rd/ Building H North Driveway	Side-Street Stop	AM	—	—	<10 (16)	A (C)	<10 (17)	A (C)
			PM	—	—	<10 (19)	A (C)	<10 (19)	A (C)
27	Devlin Rd/ Building E/H South Driveway	Side-Street Stop	AM	—	—	<10 (15)	A (C)	<10 (15)	A (C)
			PM	—	—	<10 (15)	A (B)	<10 (15)	A (B)

Table 3.11-11 (cont.): Cumulative and Cumulative Plus Project Intersection LOS

No.	Intersection[1]	Control	Peak Hour	Cumulative		Cumulative Plus Project Option 1		Cumulative Plus Project Option 2	
				Delay[2]	LOS	Delay[2]	LOS	Delay[2]	LOS

Notes:
[1] All intersections were analyzed using Synchro except intersections No. 6 through No. 11, which were analyzed using VISSIM.
[2] For signalized intersections, average intersection delay and LOS based on the 2000 HCM method is shown. For side-street stop-controlled intersections, delay and LOS for average intersection and (worst movement) delay are shown.
[3] **Bold** indicates unacceptable operations per jurisdiction standards. **Bold and shading** indicates a significant impact.
Source: Fehr & Peers, 2015.