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General Plan Housing Element 6th Cycle Update 2023-2031

CEQA ANALYSIS / Initial Study



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City of Napa | **General Plan Housing Element 6th Cycle Update 2023-2031**

CEQA Analysis

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INTRODUCTION

This document provides an analysis of the proposed City of Napa General Plan 2023-2031 (6th Cycle) Housing Element Update (the “Project”) with respect to its consistency with the adopted City of Napa 2040 General Plan, the analysis contained in the certified 2040 General Plan Environmental Impact Report (EIR), and any specific or cumulative environmental impacts that may result from Project implementation.

As explained in the following pages, the Project is consistent with the City’s General Plan, for which the City of Napa City Council certified an EIR on October 18, 2022. There are no environmental effects that are peculiar to the Project or on sites where development may occur, nor are there any cumulative impacts associated with the Project that have not already been fully addressed in a previous environmental document, or that cannot be reduced to a less than significant level through the application of uniformly applied development policies and standards. The findings presented below demonstrate that no additional environmental analysis or review is required under the California Environmental Quality Act (CEQA)¹ prior to approval of the Project.

Purpose

This CEQA Analysis/Initial Study (Analysis) shall serve as an evaluation of the City of Napa’s 2023-2031 (6th Cycle) Housing Element Update concerning CEQA compliance. The Analysis was prepared to present 1) the findings resulting from the CEQA compliance review, as described below, and 2) the recommendations concerning the appropriate CEQA compliance documentation.

Project Overview

The City of Napa (the “Lead Agency”) proposes to update the City of Napa General Plan 2015-2023 (5th Cycle) Housing Element that was adopted on March 3, 2015. This Technical Memorandum evaluates the reasonably foreseeable environmental impacts associated with adoption and implementation of the City of Napa General Plan 2023-2031 (6th Cycle) Housing Element Update (the “Project”). The Housing Element Update is mandated by state law, Government Code Sections 65580 through 65589.11, and establishes goals, policies, and actions required to plan for the regional housing needs allocated to City of Napa by regional agencies through 2031 (i.e., the regional housing needs allocation, or RHNA). The Housing Element Update includes policies designed to improve housing affordability and advance racial and social equity in accordance with the directives from the California Department of Housing and Community Development (HCD).

The 2023-2031 (6th Cycle) Housing Element Update includes the City’s Housing Policy Document, which addresses identified housing needs in Napa and includes goals, policies, and programs concerning

¹ The statutory elements of CEQA are found at Pub. Res. Code § 21000 et seq. and the adopted regulations pertaining to CEQA implementation (CEQA Guidelines) are located at 14 Cal. Code Regs § 15000 et seq.

housing and housing-related services. The Housing Element Update also includes the City's approach to addressing its share of the regional housing need and consists of a comprehensive review and update to the 5th Cycle Housing Element which covered years 2015-2022.

To satisfy and meet the RHNA, the City completed a parcel-specific land inventory that includes sites capable of accommodating the RHNA without any need for land use designation amendments or re-zoning. In total, the inventory includes 1,214 lower-income, 405 moderate-income, and 1,050 above moderate-income candidate housing sites. The environmental impacts associated with development of these sites are addressed in the City's recently adopted 2040 General Plan and its certified EIR (State Clearinghouse (SCH) No. 2021010255). Additionally, the Project does not grant any land use entitlements for specific projects, nor does it authorize development of greater density than is already permitted by adopted General Plan designations analyzed in the GPU EIR.

2040 GENERAL PLAN CONSISTENCY

The City of Napa adopted its 2040 General Plan in October 2022, after a multi-year update process. This Project has been prepared to maintain internal consistency with the General Plan, as required by state law. Specifically, the housing site inventory for the 6th Cycle Housing Element Update reflects densities that are provided in the adopted 2040 General Plan land use designations. The 6th Cycle Housing Element goals, policies, and programs were drafted to support the implementation of the vision and guiding principles for the 2040 General Plan, including the principle to "promote housing and support a diverse array of housing types to meet the needs of all segments of the population." When the City considers any future amendment to the General Plan, the City will review the Housing Element to ensure internal consistency.

PREVIOUS ENVIRONMENTAL ANALYSES OF THE PROJECT

Previous environmental analysis has been prepared and certified which is applicable to the 6th Cycle Housing Element. In October 2022, the City of Napa adopted the 2040 General Plan and certified the associated GPU EIR (SCH No. 2021010255). Cumulative impacts associated with full development and buildout of the 2040 General Plan, including zoning densities and intensities, were fully addressed in GPU EIR.

The EIR prepared for the 2040 General Plan details projected citywide growth from buildout following adoption of the update. Implementation of the 2040 General Plan is expected to result in approximately 7,800 new housing units and a total citywide population of 97,200, or an addition of 17,900 residents. The 6th Cycle Housing Element supports the creation of 3,517 new housing units at various income levels, which exceeds the City's RHNA, as assigned, but is well within the 7,800 total units anticipated under the 2040 General Plan. Although the adopted General Plan has a 2040 horizon, it does not specify or anticipate when buildout will occur, as long-range demographic and economic trends are difficult to predict. The designation of a site for a certain use also does not necessarily mean that the site will be developed or redeveloped with that use during the planning period, as development would depend

on initiative taken by property owners. Therefore, development to meet the City's RHNA over the next eight years would be consistent with the assumptions analyzed in the GPU EIR.

CEQA provides that projects consistent with the land use designations and densities established by a general plan for which an EIR was certified shall not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects that are peculiar to the project (Pub Res. Code Section 21083.3; CEQA Guidelines Section 15183). See below under "CEQA COMMUNITY PLAN EXEMPTION."

The 6th Cycle Housing Element goals, policies, and programs are internally consistent with the 2040 GPU EIR. Further, the pipeline projects and candidate housing sites identified for housing development in the 6th Cycle Housing Element are consistent with the 2040 General Plan's land use and density designations. Therefore, adoption and implementation of the 6th Cycle Housing Element would not result in any new or more severe environmental effects than were identified in the certified 2040 GPU EIR. Accordingly, no further environmental review is required to comply with CEQA in connection with the Project.

CEQA COMMUNITY PLAN EXEMPTION

Public Resources Code Section 21083.3 and CEQA Guidelines Section 15183 allow a streamlined environmental review process for projects that are consistent with the densities established by existing zoning, community plan, or general plan policies for which an EIR was certified (the Community Plan Exemption). Projects that rely on the Community Plan Exemption may benefit from the cumulative analysis contained within a GPU EIR and the application of predefined mitigation and avoidance measures. Under this circumstance, additional analysis of cumulative impacts is generally not required.

As noted above, the Project is consistent with the land use designation and densities established by the General Plan, for which an EIR was certified. The provisions contained in CEQA Guidelines Section 15183, which implement Public Resources Code Section 21083.3, are presented below.

CEQA Guidelines Section 15183, Projects Consistent with a Community Plan or Zoning

CEQA Guidelines Section 15183 (Excerpts):

(a) CEQA mandates that projects which are consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified shall not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. This streamlines the review of such projects and reduces the need to prepare repetitive environmental studies.

(b) In approving a project meeting the requirements of this section, a public agency shall limit its examination of environmental effects to those which the agency determines, in an initial study or other analysis:

- (1) Are peculiar to the project or the parcel on which the project would be located,*
- (2) Were not analyzed as significant effects in a prior EIR on the zoning action, general plan, or community plan, with which the project is consistent,*
- (3) Are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan or zoning action, or*
- (4) Are previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR.*

(c) If an impact is not peculiar to the parcel or to the project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards, as contemplated by subdivision (e) below, then an additional EIR need not be prepared for the project solely on the basis of that impact.

(d) This section shall apply only to projects which meet the following conditions:

- (1) The project is consistent with:*
 - (A) A community plan adopted as part of a general plan,*
 - (B) A zoning action which zoned or designated the parcel on which the project would be located to accommodate a particular density of development, or*
 - (C) A general plan of a local agency, and*
- (2) An EIR was certified by the lead agency for the zoning action, the community plan, or the general plan.*

(e) This section shall limit the analysis of only those significant environmental effects for which:

- (1) Each public agency with authority to mitigate any of the significant effects on the environment identified in the planning or zoning action undertakes or requires others to undertake mitigation measures specified in the EIR which the lead agency found to be feasible, and*
- (2) The lead agency makes a finding at a public hearing as to whether the feasible mitigation measures will be undertaken.*

(f) An effect of a project on the environment shall not be considered peculiar to the project or the parcel for the purposes of this section if uniformly applied development policies or standards have been previously adopted by the City or county with a finding that the development policies or standards will substantially mitigate that environmental effect when applied to future projects, unless substantial new information shows that the policies or standards will not substantially mitigate the environmental effect. The finding shall be based on substantial evidence which need not include an EIR. Such development policies or standards need not apply throughout the entire City or county, but can apply only within the zoning district in which the project is located, or within

the area subject to the community plan on which the lead agency is relying. Moreover, such policies or standards need not be part of the general plan or any community plan, but can be found within another pertinent planning document such as a zoning ordinance. Where a City or county, in previously adopting uniformly applied development policies or standards for imposition on future projects, failed to make a finding as to whether such policies or standards would substantially mitigate the effects of future projects, the decision-making body of the City or county, prior to approving such a future project pursuant to this section, may hold a public hearing for the purpose of considering whether, as applied to the project, such standards or policies would substantially mitigate the effects of the project. Such a public hearing need only be held if the City or county decides to apply the standards or policies as permitted in this section.

- (g) Examples of uniformly applied development policies or standards include, but are not limited to:*
- (1) Parking ordinances.*
 - (2) Public access requirements.*
 - (3) Grading ordinances.*
 - (4) Hillside development ordinances.*
 - (5) Flood plain ordinances.*
 - (6) Habitat protection or conservation ordinances.*
 - (7) View protection ordinances.*
 - (8) Requirements for reducing greenhouse gas emissions, as set forth in adopted land use plans, policies, or regulations.*
- (h) An environmental effect shall not be considered peculiar to the project or parcel solely because no uniformly applied development policy or standard is applicable to it.*
- (i) Where the prior EIR relied upon by the lead agency was prepared for a general plan or community plan that meets the requirements of this section, any rezoning action consistent with the general plan or community plan shall be treated as a project subject to this section.*
- (1) "Community plan" is defined as a part of the general plan of a City or county which applies to a defined geographic portion of the total area included in the general plan, includes or references each of the mandatory elements specified in Section 65302 of the Government Code, and contains specific development policies and implementation measures which will apply those policies to each involved parcel.*
 - (2) For purposes of this section, "consistent" means that the density of the proposed project is the same or less than the standard expressed for the involved parcel in the general plan, community plan or zoning action for which an EIR has been certified, and that the project complies with the density-related standards contained in that plan or zoning. Where the zoning ordinance refers to the general plan or community plan for its density standard, the project shall be consistent with the applicable plan.*
- (j) This section does not affect any requirement to analyze potentially significant offsite or cumulative impacts if those impacts were not adequately discussed in the prior EIR. If a significant offsite or cumulative impact was adequately discussed in the prior EIR, then this section may be used as a basis for excluding further analysis of that offsite or cumulative impact.*

Exemption Justification Under the Community Plan Exemption

The Project is exempt from CEQA under Public Resources Code Section 21083.3 and CEQA Guidelines Section 15183 because it involves policies and programs in the 6th Cycle Housing Element to meet the City of Napa's housing needs and assigned RHNA that are wholly consistent with the densities permitted under the 2040 General Plan. Given their nature and scope, these policies and programs either will not cause a physical environmental impact (e.g., directing the City to inventory and monitor affordable housing) or were already analyzed adequately in the City of Napa 2040 GPU EIR (SCH No. 2021010255). Additionally, the Project does not grant any development entitlements or authorize development beyond what is allowed under the City's adopted General Plan and current development regulations.

Pursuant to Public Resources Code Section 21083.3 and CEQA Guidelines §15183, the 6th Cycle Housing Element does not meet the requirements that would trigger the need for the Lead Agency to prepare subsequent environmental review. The certified 2040 GPU EIR provided environmental analysis for all the direct and indirect environmental effects of developing the land uses and densities contemplated in the Project. Specifically, the City's adopted 2040 General Plan land use designations and maximum density limits accommodate the development capacity projected for each of the candidate housing sites identified in the 6th Cycle Housing Element, including the City's entire RHNA plus a reasonable buffer. The Project also does not include any potential cumulative impacts that were not discussed in the GPU EIR. Further, no new information of substantial importance has been identified that was not included at the time of the previous EIRs; therefore, the Project does not trigger the need for additional environmental review.

Future housing development pursuant to the 6th Cycle Housing Element would be subject to compliance with the established regulatory framework, including federal, state, regional, and local regulations (e.g., General Plan policies, Municipal Code standards). Moreover, with the exception of by-right housing development, future housing development pursuant to the 6th Cycle Housing Element would be subject to further discretionary review and approval by the City, including environmental review under CEQA. Based on these factors, the Project is exempt from CEQA under Public Resources Code Section 21083.3 and CEQA Guidelines Section 15183.

Policy and Program Analysis in Support of Findings

Attachment A: 2023-2031 (6th Cycle) Housing Element CEQA Evaluation Matrix summarizes the 6th Cycle Housing Element policies and programs and provides summary findings in support of an exemption under State CEQA Guidelines Section 15183.

Attachment B: Section 15183 Exemption Checklist provides a comprehensive environmental evaluation for the Project and concludes that the Project qualifies for an exemption under State CEQA Guidelines Section 15183.

CONCLUSION: NO ADDITIONAL REVIEW REQUIRED

As evidenced by the discussions presented herein and evaluations in Attachments A and B, the Project qualifies as being exempt from further environmental review and analysis under the Community Plan Exemption. As such, it has been determined that the Project is exempt from further CEQA review, as demonstrated by the attached CEQA documentation.

In conclusion, the Project will not have any significant impacts on the environment that are peculiar to the Project or any of the housing inventory sites identified for development, that were not already identified and addressed in the 2040 GPU EIR, and no previously identified significant effects would be more severe as a result of new information that was not known when the GPU EIR was certified. Therefore, no additional environmental review or analysis is required or necessary.

2023-2031 (6TH CYCLE) HOUSING ELEMENT PROGRAM AND POLICY CEQA EVALUATION MATRIX

Program / Policy	Amendments from 5 th Cycle Housing Element		Specific Developments or Regulatory Changes Proposed Resulting in Environmental Impacts?	Summary of Determination No Physical Effect and/or Consistent with 2040 GP EIR
H1-1.1 - Collaborate to Provide Housing to Populations with Special Needs The City will actively pursue partnerships and collaboration with public and private service agencies and developers to assist in the development and rehabilitation of housing and to support services to meet the housing needs of those with special characteristics protected under state and federal fair housing laws. Along with other resources, the City will use density bonuses to assist in meeting housing needs of those with special characteristics.	<i>Consolidated/modified programs:</i>	H5.M	No	Consistent with 2040 GP EIR: This program supports partnerships and collaboration to assist in the development and rehabilitation of housing, consistent with the 2040 General Plan, but will not result in physical environmental impacts. No specific developments or regulatory changes are proposed that would result in environmental impacts; therefore, this program is not required to be evaluated further.
	<i>Consolidated/modified policies:</i>	H4.I		
H1-1.2 - Residential Care Facilities The City will support the provision of residential care facilities for special needs persons by continuing to permit small facilities in all residential areas and larger facilities as provided by updating the Zoning Ordinance to meet state law.	<i>Consolidated/modified programs:</i>	N/A	No	Consistent with 2040 GP EIR: This program supports provision of residential care facilities for special needs persons by permitting these facilities in residential areas by-right, consistent with the 2040 General Plan land use designations. No specific developments or regulatory changes are proposed that would result in environmental impacts; therefore, this program is not required to be evaluated further.
	<i>Consolidated/modified policies:</i>	H4.5		
H1-1.3 - Legislative Advocacy Support key legislation that assists cities like Napa to develop affordable housing units.	<i>Consolidated/modified programs:</i>	N/A	No	No Physical Effect: Under this program, the city will track and support state legislation for affordable housing programs. Tracking and promotion of these programs will not result in physical environmental impacts.
	<i>Consolidated/modified policies:</i>	H5.5		
H1-2.1 – Continuum of Care The City shall work with the Continuum of Care, its members, service providers, and jurisdictions, on a coordinated response plan that is updated regularly. The efforts shall include potential shelter sites and strategies to address homelessness, with an emphasis on addressing disproportionate barriers to existing homelessness and accessing housing among marginalized populations. The efforts shall include metrics and indicators to track the efficacy of programs and investments to address homelessness. These metrics will be presented each year in a publicly available annual report.	<i>Consolidated/modified programs:</i>	H4.A, H4.E	No	No Physical Effect: This program promotes a policy to assist the City’s Continuum of Care. No specific developments or regulatory changes are proposed that would result in environmental impacts; therefore, these programs will not require further evaluation under CEQA.
	<i>Consolidated/modified policies:</i>	N/A		

Program / Policy	Amendments from 5 th Cycle Housing Element	Specific Developments or Regulatory Changes Proposed Resulting in Environmental Impacts?	Summary of Determination No Physical Effect and/or Consistent with 2040 GP EIR
H1-2.2 – Supportive and Transitional Housing for Homeless through SROs The City will assist in meeting needs for additional permanent, supportive, and transitional housing for previously homeless and special needs populations. As part of the program the City will promote well-managed Single Room Occupancy (SRO) projects, including efforts to rehabilitate existing facilities to provide SRO housing, and the development of efficiency apartments as lower cost permanent housing. SRO projects involving special needs groups must be linked with social services and case management.	<i>Consolidated/modified programs:</i> H4.B <i>Consolidated/modified policies:</i> N/A	No	Consistent with 2040 GP EIR: This program establishes commitments to promote Single Room Occupancy (SRO) housing to support special needs groups through rehabilitation of existing facilities and development of efficiency apartments, consistent with the 2040 General Plan. This program includes a commitment to rehabilitate existing facilities in locations consistent with the 2040 GPU EIR’s analysis; however, no specific facilities have been identified at this time.
H1-2.3 – Permanent, Supportive and Transitional Housing In partnership with public and private agencies, the City will assist in meeting needs for additional permanent, supportive, and transitional housing for intellectual and developmental disabilities. This can be accomplished by: - Assisting developers to apply for available State and Federal monies in support of housing construction and rehabilitation targeted for persons with disabilities, including developmental disabilities. - Initiate a cooperative outreach program with the North Bay Regional Center to inform people when new housing becomes available for developmentally disabled persons. - Continue to partner with the North Bay Housing Coalition to rehabilitate units for the developmentally disabled and provide access to Section 8 vouchers.	<i>Consolidated/modified programs:</i> H4.I <i>Consolidated/modified policies:</i> N/A	No	Consistent with 2040 GP EIR: This program supports partnerships and collaboration to assist in the development of permanent, supportive, and transitional housing, in locations and at densities that are consistent with the 2040 General Plan. Therefore, this program is not required to be evaluated further.
H1-2.4 – Rental Assistance The Housing Authority of the City of Napa will continue to provide rental assistance and social services support for homeless persons and persons with special needs to the extent federal funding is available.	<i>Consolidated/modified programs:</i> H4.D, H4.C <i>Consolidated/modified policies:</i> H4.3	No	No Physical Effect: This program continues the City’s commitment to provide financial assistance and social services, but will not result in physical environmental impacts. No specific developments or regulatory changes are proposed that would result in environmental impacts; therefore, this program is not required to be evaluated further.
H2-1.1 – Development Incentive Program In coordination with the Housing Authority, support applications by affordable housing providers and developers for funding, loans, and tax credits through priority processing, fee deferrals, and incentives under the density bonus ordinance to construct: - New, affordable rental units for very low- and low-income renter households and - New affordable ownership units for first time low- and moderate-income homebuyers. Housing types may include Self-Help and Community-Help new housing.	<i>Consolidated/modified programs:</i> H2.B, H2.C <i>Consolidated/modified policies:</i> N/A	No	Consistent with 2040 GP EIR: This program supports partnerships and collaboration to assist in the development of housing, consistent with the locations and densities included in the 2040 General Plan. Therefore, this program is not required to be evaluated further.

Program / Policy	Amendments from 5 th Cycle Housing Element		Specific Developments or Regulatory Changes Proposed Resulting in Environmental Impacts?	Summary of Determination No Physical Effect and/or Consistent with 2040 GP EIR
H2-1.2 – Long Term Agreements and Deed Restrictions Continue to implement and monitor long-term agreements or deed restrictions with developers of affordable housing units that are funded by or receive incentives from Federal, State, or local housing programs. Agreements and restrictions will govern unit affordability, monitor the continuing affordability of such units, and provide incentives for renewal of affordability agreements where feasible.	Consolidated/modified programs:	H2.G	No	No Physical Effect: Under this program, the city will monitor housing affordability agreements. Monitoring of these agreements will not result in physical environmental impacts.
	Consolidated/modified policies:	N/A		
H2-1.3 – Acquisition and Rehabilitation The City will incentivize the acquisition and rehabilitation of existing, market rate, substandard rental housing for conversion to affordable rentals for extremely low, very low- and low-income households. Conversion projects must plan for high quality ongoing property management and maintenance and include restrictions on remaining affordable for 55 years.	Consolidated/modified programs:	H3.O	No	No Physical Effect: This program provides incentives to assist in the rehabilitation of housing, consistent with the 2040 General Plan, but will not result in physical environmental impacts. No specific developments or regulatory changes are proposed that would result in environmental impacts; therefore, this program is not required to be evaluated further.
	Consolidated/modified policies:	N/A		

Program / Policy	Amendments from 5 th Cycle Housing Element	Specific Developments or Regulatory Changes Proposed Resulting in Environmental Impacts?	Summary of Determination No Physical Effect and/or Consistent with 2040 GP EIR
H2-2.1 – Zoning and Subdivision Ordinance Updates Update the Zoning and Subdivision Ordinances to address changes in state law and other deficiencies as detailed in the Zoning Diagnosis Report (Appendix K), specifically including: ▪ Implementation of a housing replacement program for replacement of existing lower-income units, consistent with Cal. Gov. Code Section 65915(c)(3) ▪ Administrative review of small subdivisions and development, pursuant to SB 9 ▪ Accessory Dwelling Units and Junior Accessory Dwelling Units allowances in nonresidential zones where residential uses are permitted, for increased height, for encroachment into the front setback, and for separate conveyances, pursuant to SB 897, AB 2221, and AB 345 ▪ Density Bonuses and Affordable Housing Concessions qualifications, definitions of associated terms, and allowances for development standards modification, pursuant to AB 682, AB1551, AB 290, AB 2334, and AB 571 ▪ Low Barrier Navigation Centers as a use by-right in zones where multifamily and mixed uses are permitted, pursuant to Cal. Gov. Code Section 65660 ▪ Emergency Shelters as a use by-right, along with appropriate updates to the definition and applicable development standards, including parking, pursuant to Cal. Gov. Code 65583(a)(4) ▪ Increase accessibility of the Zoning Ordinance through updates to organization, format, and useability ▪ Large employee and agricultural employee housing as uses permitted in the same manner as other agricultural uses in the same zone (e.g., POS district), pursuant to Cal Health and Safety Code Sections 17021.5 and 17021.6 ▪ Mobile home parks as uses permitted either by-right or conditionally in zones and General Plan designations where residential uses are allowed or planned, along with appropriate updates to definitions for mobile/manufactured homes, pursuant to Cal. Gov. Code Section 65852.7 ▪ Supportive Housing explicitly permitted in the same manner as the types of housing it most closely resembles and allowed by-right where multi-family and mixed uses are allowed, including in nonresidential zones, pursuant to Cal. Gov. Code Section 65651	<i>Consolidated/modified programs:</i> N/A <i>Consolidated/modified policies:</i> H1.6, H2.3, H2.9	No	Consistent with 2040 GP EIR: This program calls for future regulatory updates to the City’s Zoning and Subdivision Ordinances, in locations and at densities that are consistent with the 2040 General Plan. Therefore, this program is not required to be evaluated further.

Program / Policy	Amendments from 5 th Cycle Housing Element		Specific Developments or Regulatory Changes Proposed Resulting in Environmental Impacts?	Summary of Determination No Physical Effect and/or Consistent with 2040 GP EIR
H2-2.2 – Conversation of Publicly Owned Lands for Housing In compliance with the Surplus Lands Act and in collaboration with other public agencies, the City shall undertake a review of publicly and institutionally owned lands to consider their viability for residential, residential mixed-use, and/or affordable housing development, and pursue follow-up actions such as prioritizing sites for purchase or affordable development. As part of this effort, the City will take the following actions: ▪ Application of the Affordable Housing Overlay zoning district to such lands ▪ Outreach to affordable housing developers about financial assistance and other incentives	<i>Consolidated/modified programs:</i> <i>Consolidated/modified policies:</i>	H1.F, H2.A H1.12, H1.13, H1.14, H2.3	No	Consistent with 2040 GP EIR: This program would provide opportunities for and promote future housing development on City-owned property in locations and at densities that are consistent with the 2040 General Plan. Therefore, this program is not required to be evaluated further.
H2-2.3 – ADU and JADU Incentive Program in High Opportunity Areas Encourage additional, well-designed accessory dwelling units as a desired use in all residential neighborhoods throughout the City and implement incentive programs for ADUs and JADUs that house local workers or that are deed restricted. Encourage homeowners to construct an ADU with an agreement to charge rents affordable for lower income households or rent the ADU to Housing Choice Voucher participants.	<i>Consolidated/modified programs:</i> <i>Consolidated/modified policies:</i>	H3.D H1.6	No	Consistent with 2040 GP EIR: This program provides incentives to develop ADUs, consistent with the 2040 General Plan. Therefore, this program is not required to be evaluated further.
H2-2.4 –In Fill Housing Prototypes Encourage additional, well-designed duplexes, triplexes, and other attached dwelling types throughout the Single-Family, Traditional Residential, and any other single-family General Plan designations and zoning districts that allow these uses. Density bonuses may be provided for affordable units. The City shall work with infill developers and other stakeholders on replicable site plans or architectural plans to reduce pre-development costs and expedite the planning approval process for a variety of ADA-accessible infill housing types, including duplexes, triplexes, fourplexes, bungalow courts, and other workforce housing types, that can be used throughout the City.	<i>Consolidated/modified programs:</i> <i>Consolidated/modified policies:</i>	N/A H3.6, H1.6	No	Consistent with 2040 GP EIR: This program supports provision of a variety of housing types to serve all segments of the community, consistent with the locations and densities permitted under the 2040 General Plan land use designations. Therefore, this program is not required to be evaluated further.

Program / Policy	Amendments from 5 th Cycle Housing Element		Specific Developments or Regulatory Changes Proposed Resulting in Environmental Impacts?	Summary of Determination No Physical Effect and/or Consistent with 2040 GP EIR
H2-2.5 – Develop Web-based Land Inventory The City shall develop and maintain a web-based inventory of housing element sites that is updated quarterly to identify sites appropriate for housing. The inventory will also track remaining capacity to meet the RHNA in compliance with no-net loss requirements to maintain adequate capacity for lower- and moderate-income housing throughout the Housing Element Planning Period. The inventory will also highlight surplus City-owned sites and other public lands that would be appropriate for affordable housing. This web-based inventory will assist the city to maintain an adequate supply of land designated for all types of residential development to meet the quantified housing need of 1,939 City units and 730 absorbed from the County's obligation. This will also assist the City to evaluate residential development proposals for consistency with the 2023-2031 Housing Element Sites Inventory. If a development approval will cause the Sites Inventory to be unable to accommodate all income levels of the RHNA, then additional site(s) shall be added pursuant to Government Code Section 65863(b)(1).	<i>Consolidated/modified programs:</i> <i>Consolidated/modified policies:</i>	N/A H1.2	No	No Physical Effect: Under this program, the city will monitor housing sites identified in the 6 th Cycle Housing Element inventory to track progress in meeting the RHNA. Monitoring of these sites will not result in physical environmental impacts. No specific developments or regulatory changes are proposed that would result in environmental impacts; therefore, this program is not required to be evaluated further.
H2-2.6 - Land Banking Program Based on availability of funding, the City Housing Division and Housing Authority of the City of Napa, will continue to pursue land acquisition/land banking opportunities for future affordable projects.	<i>Consolidated/modified programs:</i> <i>Consolidated/modified policies:</i>	N/A H2.11	No	Consistent with 2040 GP EIR: This program may provide future opportunities for affordable housing development, in locations and at densities that are consistent with the 2040 General Plan. Therefore, this program is not required to be evaluated further.
H2-2.7 – Impact Fee Realignment During the Housing Cycle, review developer and impact fees to align fee increases with changes in the Consumer Price Index (CPI) and set fee structure to encourage mixed-use and diverse development.	<i>Consolidated/modified programs:</i> <i>Consolidated/modified policies:</i>	H5.D H2.3	No	No Physical Effect: This program updates development fees and will not result in physical environmental impacts. No specific developments or regulatory changes are proposed that would result in environmental impacts; therefore, this program is not required to be evaluated further.
H2-2.8 – Fast Tracking Program Implement enhanced processing for 100% affordable housing projects across all City departments, to include: fees deferred/reduced/waived, fast-tracking projects, APR on fast-tracked units produced.	<i>Consolidated/modified programs:</i> <i>Consolidated/modified policies:</i>	N/A H5.1, H5.2	No	No Physical : This program updates review procedures for affordable housing development applications, which is an entirely administrative process that will not result in physical environmental impacts. Therefore, this program is not required to be evaluated further.

Program / Policy	Amendments from 5 th Cycle Housing Element		Specific Developments or Regulatory Changes Proposed Resulting in Environmental Impacts?	Summary of Determination No Physical Effect and/or Consistent with 2040 GP EIR
H2-2.9 – General Plan Monitoring Monitor development projects to achieve minimum densities as designated by the General Plan per Government Code section 65863. The City shall not approve development below minimum designated General Plan densities unless physical or environmental constraints preclude their achievement. If development on a site is to occur over time, the applicant must show that the proposed development does not prevent subsequent development of the site to its minimum density.	<i>Consolidated/modified programs:</i>	N/A	No	Consistent with 2040 GP EIR: This program enforces the land use designations and densities as provided in the 2040 General Plan for new housing developments. Therefore, this program is not required to be evaluated further.
H2-3.1 – Low Income and Special Needs Funding Program Utilize existing and pursue future funding resources such as housing impact fees, local revenue bonds, lodging tax revenue, and State and federal funds to be used for the development of housing at income levels below 120% AMI (low income) for homeownership opportunities. Funding sources can also support special needs housing and support services, first time homebuyer programs, retention of existing subsidized units as affordable, low-income renters, and rehabilitation of existing low-income units. When the City issues a Notice of Funding Availability (NOFA), projects that meet the following criteria will be prioritized: ▪ Incorporate cost efficient methods for home construction and operation, including value engineering; ▪ Address State requirements for minimum unit sizes unless applicant can justify alternative sizes; ▪ Include energy/water efficient and sustainable building methods and materials; and ▪ Locate within close proximity to transit, employment, and services.	<i>Consolidated/modified programs:</i>	H5.K	No	Consistent with 2040 GP EIR: This program incentivizes future affordable housing development in locations and at densities that are, consistent with the 2040 General Plan. Therefore, this program is not required to be evaluated further.
H2-3.2 – Long Term Housing Needs through Specific Plans Address long-term housing needs through future Specific Plans particularly along major transportation corridors, near services, and on large sites where services and transit can be incorporated. Such plans shall be developed through an effective and collaborative community involvement process.	<i>Consolidated/modified programs:</i>	N/A	No	No Physical Effect: This program calls for the creation of new area-specific planning documents, but it does not include specific parameters for what plans will include or what level of development future plans may permit. To the extent that the City develops and adopts plans that changes permitted uses or increase densities as compared with the 2040 General Plan, such actions would undergo analysis to determine what level of CEQA compliance is required prior to their adoption. No specific developments or regulatory changes are currently proposed that would result in environmental impacts; therefore, this program is not required to be evaluated further.

Program / Policy	Amendments from 5 th Cycle Housing Element		Specific Developments or Regulatory Changes Proposed Resulting in Environmental Impacts?	Summary of Determination No Physical Effect and/or Consistent with 2040 GP EIR
H2-4.1 – Expanding Information for Developers To support transparency and public education, the City will maintain and annually update webpages dedicated to housing development and resources. This accessible site will include information in English and Spanish that covers: - Public noticing for permit applications; - Materials and information on planning processes, timelines, fees, and guidelines; - Housing assistance program options, including eligibility standards; - Contact information for City housing staff; and - Links to relevant partner agencies; and - Links to Fair Housing resources.	<i>Consolidated/modified programs:</i>	H5.J	No	No Physical Effect: This program updates City webpages to provide people with information about housing resources and will not result in physical environmental impacts. No specific developments or regulatory changes are proposed that would result in environmental impacts; therefore, this program is not required to be evaluated further.
H2-4.2 – Connecting the Community to Housing Resources The City will partner with public and private agencies, community groups, and non-profits to connect all segments of the population to housing resources, with consideration for underrepresented groups. The City will provide an annual progress report detailing the number of people served and resources used via these partnerships. Programs include: - Resources for Spanish-speaking and other non-English speaking residents - Farmworker housing resources available from County - Low- and moderate-income first-time homebuyer resources - Rental assistance vouchers - Outreach/counseling related to housing - Dispute resolution and fair housing practices	<i>Consolidated/modified programs:</i>	H2.D, H5.J	No	No Physical Effect: This program supports partnerships and collaboration to connect community members with available housing resources and will not result in physical environmental impacts. No specific developments or regulatory changes are proposed that would result in environmental impacts; therefore, this program is not required to be evaluated further.
H2-4.3 – Expanding Information on Housing Assistance Continue to use, to the fullest extent possible, available Federal subsidies to residents through the Section 8 or other rental assistance programs. The Housing Authority will provide information to local residents on the use of any new housing assistance programs which become available.	<i>Consolidated/modified programs:</i>	H5.L	No	No Physical Effect: This program provides housing resources to low-income community members and will not result in physical environmental impacts. No specific developments or regulatory changes are proposed that would result in environmental impacts; therefore, this program is not required to be evaluated further.

Program / Policy	Amendments from 5 th Cycle Housing Element		Specific Developments or Regulatory Changes Proposed Resulting in Environmental Impacts?	Summary of Determination No Physical Effect and/or Consistent with 2040 GP EIR
H2-4.4 – Anti-Displacement Engage community members and partner organizations in visioning processes to create local anti-displacement solutions through neighborhood-level planning in areas targeted for inclusive economic and community development, particularly those at-risk of displacement. This engagement may be conducted concurrently with public engagement before July 2025 for the City’s consolidated planning cycle.	<i>Consolidated/modified programs:</i>	N/A	No	No Physical Effect: This program supports partnerships and collaboration to identify anti-displacement strategies and will not result in physical environmental impacts. No specific developments or regulatory changes are proposed that would result in environmental impacts; therefore, this program is not required to be evaluated further.
H2-4.5 – Visioning Housing Goals in Master Plans Promote community visioning processes for master plans and specific plans to identify use and design objectives specific to these areas [to create broad, community-based visions that include opportunities for housing]. Specific plans should: ▪ Include housing goals. ▪ Incorporate fast track process provisions for subsequent projects that are consistent with the plan. ▪ Identify those sites which are desirable for residential or residential mixed-use. ▪ Be developed through an effective and collaborative community involvement process (consistent with Policy H2-4). ▪ Be clear and easily implemented. ▪ As appropriate, identify desired three-dimensional qualities and allow density to fit within that envelope. ▪ Include standards to assure that identified housing goals will happen, such as identifying the mix of uses, minimum density standards, or a percentage of affordable units, and a minimum number of housing units by type.	<i>Consolidated/modified programs:</i>	N/A	No	No Physical Effect: This program promotes public engagement on and consistency with the 2040 General Plan in future planning documents and will not result in physical environmental impacts. No specific developments or regulatory changes are proposed that would result in environmental impacts; therefore, this program is not required to be evaluated further.
H3-1.1 – Emergency Repairs and Rehabilitation The City will continue the Emergency Home Repair Program to help repair windows, doors, leaking roofs plus plumbing and electrical problems for income eligible City of Napa homeowners and landlords. As part of this program home repair and rental repair loans are available for needed repairs including foundation, structural, electrical, heating and cooling, windows, flooring, painting, insulation, and termite repairs, as well as disabled accessibility and energy efficiency improvements.	<i>Consolidated/modified programs:</i>	H3.H, H3.I	No	No Physical Effect: This program continues the City’s commitment to assist in the rehabilitation of existing housing and will not result in physical environmental impacts. No specific developments or regulatory changes are proposed that would result in environmental impacts; therefore, this program is not required to be evaluated further.

Program / Policy	Amendments from 5 th Cycle Housing Element		Specific Developments or Regulatory Changes Proposed Resulting in Environmental Impacts?	Summary of Determination No Physical Effect and/or Consistent with 2040 GP EIR
H3-1.2 – Design Standards Adopt and implement objective design standards that: - Promote certainty of review outcomes; - Encourage appropriate maintenance and rehabilitation of historic homes; - Consider existing neighborhood character; - Incorporate universal design principles to serve special needs populations, as appropriate; - Support the development of high-quality, well-designed housing; and - Provide for a greater variety of housing options to meet community needs.	<i>Consolidated/modified programs:</i> <i>Consolidated/modified policies:</i>	N/A H3.1, H3.8	No	Consistent with 2040 GP EIR: This program calls for regulatory updates that promote future housing development in locations and at densities that are consistent with the 2040 General Plan. Therefore, this program is not required to be evaluated further.
H3-2.1 Corridor Focus Areas Incentivize mixed-use and higher density development patterns in new projects in corridor focus areas. Criteria for identifying key sites include site size, site location near services and transit, access to active transportation and recreation opportunities, and whether proposed businesses would create higher-than-average percentages of low wage jobs.	<i>Consolidated/modified programs:</i> <i>Consolidated/modified policies:</i>	N/A H2.4, H2.15	No	Consistent with 2040 GP EIR: This program incentivizes future affordable housing development in locations and at densities that are consistent with the 2040 General Plan, but will not result in physical environmental impacts. Therefore, this program is not required to be evaluated further.
H3-2.2 – Design Review Guidelines Update the residential design review guidelines and process to consider: - Fee adjustments, - Objective standards and criteria, - Increased design flexibility for unique projects and settings to minimize use of Planned Development regulations, - Mandatory early engagement, - Public meeting timeline, and development of ADUs and higher quality infill multi-family housing. - Reduce or eliminate minimum parking standards, consistent with state law.	<i>Consolidated/modified programs:</i> <i>Consolidated/modified policies:</i>	H3.A, H3.B N/A	No	Consistent with 2040 GP EIR: This program calls for regulatory updates that promote future housing development in locations and at densities that are consistent with the 2040 General Plan. Therefore, this program is not required to be evaluated further.
H3-3.1 – Code Enforcement Update code enforcement policies and use available subsidies to rehabilitate substandard residential units for extremely low, very low- and low-income renters, with a focus on health, safety, and energy conservation improvements. Prioritize place-based solutions to reduce displacement risk for residents by improving living conditions and enabling them to remain in their home and community.	<i>Consolidated/modified programs:</i> <i>Consolidated/modified policies:</i>	H2.H H2.15	No	No Physical Effect: This program support the City’s commitment to assist in the rehabilitation of existing housing and will not result in physical environmental impacts. No specific developments or regulatory changes are proposed that would result in environmental impacts; therefore, this program is not required to be evaluated further.

Program / Policy	Amendments from 5 th Cycle Housing Element		Specific Developments or Regulatory Changes Proposed Resulting in Environmental Impacts?	Summary of Determination No Physical Effect and/or Consistent with 2040 GP EIR
H4-1.1 – Sustainability Standards In addition to continuing sustainable development patterns, the City shall continue to update its energy efficiency building, recycling, and sustainability standards to continue to meet State standards. When appropriate, the City will require projects to exceed, rather than meet, State standards for energy efficiency, water conservation, and recycling.	<i>Consolidated/modified programs:</i>	N/A	No	Consistent with 2040 GP EIR: This program calls for regulatory updates in response to future updates to State requirements and promotes sustainability, that would not affect permitted uses or densities under the 2040 General Plan. Therefore, this program is not required to be evaluated further.
H4-2.1 – Transit and Connection Opportunities Given the diminishing availability of developable land, the City will continue to identify opportunities to connect housing with transportation, neighborhood services, and amenities. Consistent with other General Plan Transportation Element policies, the city will use the following criteria in reviewing development proposals, selecting housing sites, and or selecting parcels as part land inventory: - Housing on the site will help affirmatively further fair housing by expanding the distribution and variety of housing types and sizes in the city. - Provides for adequate, safe, and accessible internal and external multi-modal traffic circulation, including emergency evacuation. - Offers convenient access to existing public transportation or the potential for such access as public transportation systems are expanded. - Offers convenient access to neighborhood services and amenities typically required by residents. - Offers convenient access to typical neighborhood recreation amenities or designed to provide adequate recreation amenities on-site.	<i>Consolidated/modified programs:</i>	N/A	No	Consistent with 2040 GP EIR: This program promotes efficiencies in future housing development with strong connections to transit, in locations and at densities that are consistent with the 2040 General Plan. Therefore, this program is not required to be evaluated further.

Program / Policy	Amendments from 5 th Cycle Housing Element		Specific Developments or Regulatory Changes Proposed Resulting in Environmental Impacts?	Summary of Determination No Physical Effect and/or Consistent with 2040 GP EIR
H4-2.2 – Potential Reuse of Commercial Sites The City will reevaluate the use of neighborhood shopping centers or other commercial sites if, at a future date, the owner initiates redevelopment of the site or any of these commercial activities become not viable. If residential or mixed-use developments are considered, criteria for determining the appropriate housing types include: ▪ The type of street (major, collector, etc.) which would provide access to the site and levels of service on the street in the morning and afternoon peak hours. ▪ Availability of public services, like transit, and facilities such as infrastructure (water, sewer, etc.), school capacity, parks and open space. ▪ The ability of the project to provide landscaping for parking areas, façade modulation and orientation of buildings which would ensure privacy for, and minimize impacts on, any adjacent single-family homes, and reduce the perception of density in a multi-family project. ▪ Potential to provide housing for employees. ▪ The ability of the project to provide neighborhood serving commercial uses. ▪ Potential to provide riverfront amenities and/or riverfront commercial uses.	<i>Consolidated/modified programs:</i> <i>Consolidated/modified policies:</i>	N/A H3.11	No	Consistent with 2040 GP EIR: This program supports future housing development in underutilized commercial areas, in locations and at densities that are consistent with the 2040 General Plan. Therefore, this program is not required to be evaluated further.
H4-2.3 – Expanding Transportation Options for Affordable Housing Tenants Consistent with the Transportation Element, the City will continue to work with the Napa Valley Transportation Authority to seek funding opportunities to expand multi-modal transportation opportunities to areas of greatest need, promoting connections between affordable housing and community resources.	<i>Consolidated/modified programs:</i> <i>Consolidated/modified policies:</i>	H3.K N/A	No	No Physical Effect: This program supports administrative efforts to explore future expansion of the City’s transportation network, but it will not directly result in physical environmental impacts. To the extent that the City identifies and takes action to approve transportation improvements, such actions would undergo analysis to determine what level of CEQA compliance is required prior to their adoption. No specific developments or regulatory changes are currently proposed that would result in environmental impacts; therefore, this program is not required to be evaluated further.
H4-3.1 – Energy Efficiency and Water Conservation The City will apply for funds to assist residents with energy efficiency and water conservation retrofits and weatherization resources and/or partner with community services agencies to provide financial assistance for low-income persons to offset the cost of weatherization and heating and cooling homes.	<i>Consolidated/modified programs:</i> <i>Consolidated/modified policies:</i>	H2.H N/A	No	No Physical Effect: This program supports efforts to increase the efficiency of existing housing and will not result in physical environmental impacts. No specific developments or regulatory changes are proposed that would result in environmental impacts; therefore, this program is not required to be evaluated further.

Program / Policy	Amendments from 5 th Cycle Housing Element		Specific Developments or Regulatory Changes Proposed Resulting in Environmental Impacts?	Summary of Determination No Physical Effect and/or Consistent with 2040 GP EIR
H4-4.1 – Recreation Improvements for the Underserved Establish mechanisms to prioritize City park and recreation amenity improvements that are convenient and universally accessible near underserved and higher density residential and mixed-use areas, in conformance with the Parks Master Plan recommendations and the Community Services, Parks, and Recreation Element.	<i>Consolidated/modified programs:</i>	H3.M	No	Consistent with 2040 GP EIR: This program supports future efforts to provide amenities in areas of greatest need, in locations consistent with the 2040 General Plan. Therefore, this program is not required to be evaluated further.
	<i>Consolidated/modified policies:</i>	N/A		
H4-4.2 – Investment in Areas of Greatest Need To increase community investment and access to opportunities in the City’s areas of greatest need (e.g., the Southeast Quadrant), the City may take the following actions: ▪ Establish community spaces and recreation opportunities, such as parks and trails. ▪ Collaborate with Napa Valley Transportation Authority to provide additional or improve existing multi-modal transportation connections to community resources and economic opportunities. ▪ Facilitate development of a full-service grocery store and other retail. Develop a proactive code enforcement program that targets areas of concentrated rehabilitation needs, results in repairs and mitigates potential cost, displacement and relocation impacts on residents. ▪ Dedicate or seek funding to prioritize basic infrastructure improvements (e.g., water, sewer) in disadvantaged areas. ▪ Address negative impacts from climate change through investments in adaptation measures such as urban forestry, flood prevention, etc. in disadvantaged areas. ▪ Inter-governmental coordination on areas of high need. ▪ Recruit residents from areas of concentrated poverty to serve on boards, committees, task forces, and other local government decision-making bodies. ▪ Catalyze leadership and future community wide decision-makers, including affirmative recruitment in hiring practices. ▪ Leverage private investment for community revitalization, including philanthropic. ▪ Expand access to community meetings, including addressing language barriers and meeting times.	<i>Consolidated/modified programs:</i>	N/A	No	Consistent with 2040 GP EIR: This program supports future efforts to provide opportunities in areas of greatest need, in locations and at densities that are consistent with the 2040 General Plan. Therefore, this program is not required to be evaluated further.
	<i>Consolidated/modified policies:</i>	N/A		

Program / Policy	Amendments from 5 th Cycle Housing Element		Specific Developments or Regulatory Changes Proposed Resulting in Environmental Impacts?	Summary of Determination No Physical Effect and/or Consistent with 2040 GP EIR
H5-1.1 – Preventing Displacement Develop an Anti-Displacement Strategy, including assessment of a variety of tenant protection measures to determine if appropriate for the City, including but not limited to: - Expansion of relocation benefits beyond those required by California law for landlords to pay to lower-income tenants to also apply to moderate-income tenants; - Expansion of the amount of relocation benefits beyond those required by California law for lower-income tenants; - Minimum lease terms; - Required notifications to tenants and landlords of legal requirements; and - Expansion of any other relocation/anti-displacement provisions.	<i>Consolidated/modified programs:</i>	N/A	No	No Physical Effect: This program promotes protection measures to prevent displacement and will not result in physical environmental impacts. No specific developments or regulatory changes are proposed that would result in environmental impacts; therefore, this program is not required to be evaluated further.
H5-1.2 – Eligibility Preferences Consistent with state and federal fair housing laws, establish eligibility preferences for affordable housing programs that prioritize people who live in, work in, or were recently displaced from Napa. Policy is subject to the FHA and related laws.	<i>Consolidated/modified programs:</i>	H2.I	No	No Physical Effect: This program will prioritize housing resources to combat displacement and will not result in physical environmental impacts. No specific developments or regulatory changes are proposed that would result in environmental impacts; therefore, this program is not required to be evaluated further.
H5-1.3 – Affordable Housing Database The City will develop a system and/or database of affordable housing to document the number of units under agreements annually. The system will track projects approved, including ADUs, the number of affordable units by income level, and the various funding sources.	<i>Consolidated/modified programs:</i>	N/A	No	No Physical Effect: Under this program, the city will inventory and monitor existing and future affordable housing units, which is an administrative function. Monitoring of these units will not result in physical environmental impacts. No specific developments or regulatory changes are proposed that would result in environmental impacts; therefore, this program is not required to be evaluated further.
H5-1.4 – Preserving Existing Supply To the extent permitted by law, continue to use mechanisms in the City Code to regulate the conversion of rental, mobile home, and multi-family housing to other uses to protect and conserve the supply of low- and moderate-income housing options both for rent and ownership. Sites zoned for multi-family shall not be redesignated or rezoned for other uses without equivalent additional land being designated for multi-family purposes.	<i>Consolidated/modified programs:</i>	N/A	No	No Physical Effect: This program continues the City’s commitment to preserve existing housing units and residential uses, which will not change current conditions, and therefore will not result in physical environmental impacts. No specific developments or regulatory changes are proposed that would result in environmental impacts; therefore, this program is not required to be evaluated further.

Program / Policy	Amendments from 5 th Cycle Housing Element		Specific Developments or Regulatory Changes Proposed Resulting in Environmental Impacts?	Summary of Determination No Physical Effect and/or Consistent with 2040 GP EIR
H5-1.5 – Affordable Housing Monitoring Use the housing database from program H5-1.3 as a mechanism to monitor and identify units at risk of losing their affordability subsidies, not meeting affordability requirements, or losing rent restriction agreements, including affordable units provided through density bonuses or other programs or incentives. For housing at risk of converting to market rate, including the 84 affordable Napa Creek Manor units estimated to convert to market-rate on May 31, 2029, the City will: - Contact property owners of units at risk of converting to market-rate housing within one year of affordability expiration to discuss the City’s desire to preserve complexes as affordable housing. - Coordinate with owners of expiring subsidies to ensure the required notices to tenants are sent out at 3 years, 12 months, and 6 months. - Reach out to agencies interested in purchasing and/or managing at-risk units. - Work with tenants to provide education regarding tenant rights and conversion procedures pursuant to California law.	<i>Consolidated/modified programs:</i>	H3.N	No	No Physical Effect: Under this program, the city will monitor housing affordability agreements and support preservation of affordable units, which is an administrative function. Monitoring of these agreements and preservation of affordability for existing units will not result in physical environmental impacts. No specific developments or regulatory changes are proposed that would result in environmental impacts; therefore, this program is not required to be evaluated further.
	<i>Consolidated/modified policies:</i>	H2.14, H3.12, H3.13, H3.17		
H5-2.1 – Addressing Local Housing Needs To adequately provide housing for a variety of household types, include requirements to demonstrate higher density development (18 units per acre or more) addresses local housing needs (e.g., special needs, larger housing units with three bedrooms or more). The City may then consider actions or conditional approvals that are responsive to local needs.	<i>Consolidated/modified programs:</i>	H1.C, H1.D	No	Consistent with 2040 GP EIR: This program enforces the land use designations and densities in the 2040 General Plan and will not result in physical environmental impacts beyond those identified in the GPU EIR. Therefore, this program is not required to be evaluated further.
	<i>Consolidated/modified policies:</i>	N/A		
H5-2.2 – Matching Jobs to Housing Require analysis of how major, non-residential development proposals (over 100 employees) impact housing demand, which may require mitigation measures (above housing impact fee requirements) to provide better housing and jobs balance in the City of Napa. If an impact is identified, appropriate mitigation may be required, including but not limited to the provision of new housing units or opportunities for employees, payment of in lieu fees, or an alternative equivalent action.	<i>Consolidated/modified programs:</i>	H1.D, H1.E	No	No Physical Effect: This program requires the City to study demand for future housing development in response to potential non-residential development. To the extent that the City identifies and takes action to mitigate the effects of non-residential development, such actions would undergo analysis to determine what level of CEQA compliance is required prior to their adoption. No specific developments or regulatory changes are currently proposed that would result in environmental impacts; therefore, this program is not required to be evaluated further.
	<i>Consolidated/modified policies:</i>	H1.10		

Program / Policy	Amendments from 5 th Cycle Housing Element		Specific Developments or Regulatory Changes Proposed Resulting in Environmental Impacts?	Summary of Determination No Physical Effect and/or Consistent with 2040 GP EIR
H5-2.3 – Neighborhoods of Opportunity and Ownership Work to make all neighborhoods places of opportunity and encourage investments while minimizing the involuntary displacement of people of color and other vulnerable populations, such as low-income households, the elderly, and people with disabilities due to the influx of less vulnerable populations attracted by increased opportunities and/or investments. The City shall conduct outreach with community-based organizations (CBOs) and other potential community partners that are working with interested low-income community members to develop new forms of community-driven, collective ownership models and wealth building strategies for lower-income residents (e.g., co-op housing, community land trusts) to identify ways the City can support these efforts. The City shall work with communities at-risk of displacement to evaluate these ownership models.	<i>Consolidated/modified programs:</i>	N/A	No	No Physical Effect: This program calls for the City to collaborate with community-based organizations and other agencies to identify strategies to provide greater opportunities while avoiding displacement. It will not result in physical environmental impacts. No specific developments or regulatory changes are proposed that would result in environmental impacts; therefore, this program is not required to be evaluated further.
	<i>Consolidated/modified policies:</i>	N/A		

Community Plan Exemption Checklist

This checklist provides an analysis of environmental impacts resulting from the Project. Following the format of CEQA Guidelines Appendix G, environmental effects are evaluated to determine if the Project would result in a potentially significant impact.

- Items checked “Significant Project Impact” indicates that the Project could result in a significant effect peculiar to the Project or individual project sites that is more severe than was analyzed in the 2040 GPU EIR (“GPU EIR”) and cannot be reduced with previously-adopted mitigation measures or generally-applicable development standards.
- Items checked “Impact not identified by GPU EIR” indicates the Project would result in a significant impact (Project-specific or cumulative that was not identified in the GPU EIR) that cannot be reduced to a less than significant-level with previously-adopted mitigation measures or generally-applicable development standards. .
- Items checked “Substantial New Information” indicates that there is new information which leads to a determination that a Project impact is more severe than what had been anticipated by the GPU EIR.

A Project does not qualify for the Community Plan Exemption if it is determined that it would result in:

- an impact that is peculiar to the Project or an individual project site that was not identified as a significant impact under the GPU EIR;
- a more severe impact due to new information; or
- a potentially significant off-site impact or cumulative impact not discussed in the GPU EIR.

A summary of the staff’s analysis of each potential environmental effect is provided below the checklist for each subject area.

Aesthetics

Except as provided in Cal. Pub. Res. Code § 21099, would the project:

Issues and Supporting Evidence	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☐
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☐
d. Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	☐	☐	☐

Discussion

The Housing Element identifies sites designated for residential development that were previously evaluated for potential aesthetic impacts in the GPU EIR environmental documents. The Housing Element does not identify any additional sites for residential development or changing density standards than those evaluated in the GPU EIR.

a) and b) Scenic Vistas / Resources: According the GPU EIR, no roadways in or near the in the city are designated in federal plans as scenic highways worthy of protection for maintaining and enhancing scenic viewsheds. Accordingly, there are no federal regulations related to aesthetic resources that apply to implementation of the General Plan.

According to the General Plan, future development allowed by the General Plan would be located entirely within an urbanized area. No rural areas would be affected by development. In addition, no scenic vistas or officially designated federal, state, or local scenic routes are associated with the Planning Area. For these reasons, the visual character and quality of rural areas, scenic vistas, and

scenic routes would not be affected by the development under the General Plan and these resources are not discussed further in the GPU EIR.

The Housing Element Update would not directly result in physical development in the city in any locations or at intensities that differ from development allowed under the General Plan, and no new or more severe impacts to scenic vistas or resources would result. The identified RHNA sites are already designated and/or zoned to accommodate the density assumed in this analysis, and no changes to General Plan designations or development intensities are proposed. The Project would not result in any development that would impact aesthetics beyond what was contemplated in connection with the General Plan, therefore, the Project would not result in a more severe impact than was identified in the GPU EIR.

c) Zoning / Regulations: The Housing Element Update would not involve physical development in any locations or at intensities that differ from development allowed under the General Plan and would not conflict with zoning or regulations governing scenic quality. The RHNA sites identified in the Housing Element are already designated and/or zoned for development and would not conflict with regulations governing scenic quality. Thus, no new or more severe impact as compared to the GPU EIR would result.

d) Light and Glare: The proposed project would not directly result in development in the City in any locations or at intensities that differ from development allowed under the General Plan, and it would not create light or glare sources in the City that differ from what was analyzed in the GPU EIR. Thus, no new or more severe impact as compared to the GPU EIR would result. Future development on the sites identified in the Housing Element will be required to adhere to the city's policies and regulations regarding light and glare, including Zoning Ordinance requirements for Dark Sky Compliant lighting. Thus, no new or more severe impact as compared to the GPU EIR would result.

Conclusion

With regards to the issue area, the following findings can be made:

1. No peculiar impacts to the Project or the housing opportunity sites have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

Agricultural and Forest Resources

Would the project:

Issues and Supporting Evidence	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code §12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code §51104(g)) or result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐
d. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	☐	☐	☐

Discussion

The Housing Element identifies sites designated for residential development that were previously evaluated for potential impacts to agriculture and forestry in the GPU EIR. The Housing Element does not require zoning changes for residential development or changing density standards from the General Plan.

The Project would be consistent with the analysis within the GPU EIR because it would not create additional impacts, increase impacts, and there is no new information of substantial importance than

identified within the GPU EIR regarding Important Farmland, Williamson Act Contracts or areas within forest land and timberlands.

a) Important Farmland: The GPU EIR concluded that the impact to Important Farmland to be significant and unavoidable. As described in the GPU EIR, the implementation of the General Plan would result in conversion of Farmland of Statewide Importance to non-agricultural use. Given that housing development is the main objective of the General Plan and multiple sites of Important Farmland are currently zoned and planned for residential uses, mitigation to prevent conversion of this farmland would be contrary to the General Plan and not practicable. Therefore, according to the GPU EIR this impact is significant and unavoidable.

The Project would not result in any development of agricultural land beyond what was contemplated in connection with the General Plan, therefore, the Project would not result in a more severe impact than was identified in the GPU EIR.

b) Agriculture, Williamson Act: As discussed in the regulatory and environmental setting sections of the GPU EIR Agricultural and Forestry Resources and there are no Williamson Act contracts within the Planning Area of the General Plan. Existing zoning for agricultural use generally corresponds to the Agricultural Resource District, though some agricultural use is conditionally permitted in other zoning districts such as the Parks and Open Space District and Hillside overlay.

The Project would not result in any development of agricultural land beyond what was contemplated in connection with the General Plan, therefore, the Project would not result in a more severe impact than was identified in the GPU EIR.

c. and d.) Forest Land, Timberlands: As described in the Environmental Setting sections of the GPU EIR Agricultural and Forestry Resources, most of the existing forest land in the city is located within parks, open space, and natural areas such as along creeks. The City of Napa does not contain any property zoned or designated as forest land or timberland (as defined in Public Resources Code §4526). In addition, Implementation of the General Plan would therefore preserve forest lands to the greatest extent feasible with respect to the loss of forest land or conversion of forest land to non-forest use in the Planning Area. As such, the EIR identified this impact is less than significant, and no mitigation measures are required.

The Project would not result in any development of agricultural land beyond what was contemplated in connection with the General Plan, therefore, the Project would not result in a more severe impact than was identified in the GPU EIR.

Conclusion

With regards to the issue area, the following findings can be made:

1. No peculiar impacts to the Project or the housing opportunity sites have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

Air Quality

Would the project:

Issues and Supporting Evidence	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard)?	☐	☐	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☐

Discussion

The Housing Element will not, in and of itself, result in impacts to air quality or plans for air quality, or produce pollutants or odors. At such time that a development proposal is considered, that project will be subject to adopted development guidelines/standards. Short-term air quality impacts resulting from construction of the sites, such as dust generated by clearing and grading activities, exhaust emissions from gas- and diesel-powered construction equipment, and vehicular emissions associated with the commuting of construction workers will be subject to rules/protocols outlined below.

a) Conflicts with Air Quality Plans: The GPU EIR concluded air quality impacts as a result of development under the general plan to be significant and unavoidable. Development projects under the General Plan fall under the jurisdiction of BAAQMD. BAAQMD has local air quality jurisdiction over projects in the San Francisco Bay Area Air Basin (SFBAAB) including Napa County. BAAQMD developed advisory emission thresholds that are outlined in its California Environmental Quality Act, Air Quality Guidelines (CEQA Guidelines) to assist CEQA lead agencies in determining the level of significance of a project's emissions, including ozone, CO, particulate matter, TACs, and odors. (Bay Area Air Quality Management District 2017c)

The GPU EIR analysis considered whether the General Plan implementation would conflict with the most recent air quality plan (2017 Clean Air Plan), consistent with BAAQMD's guidance for programmatic analyses. The impact analysis evaluated whether the General Plan supports the primary goals of the 2017 Clean Air Plan, including applicable control measures from the 2017 Clean Air Plan, and whether it would disrupt or hinder implementation of any 2017 Clean Air Plan control measure.

The GPU EIR analysis concluded, the General Plan would incorporate applicable control measures of the 2017 Clean Air Plan and would not disrupt or hinder implementation of any of these control measures. Also, the increase in vehicle trips associated with resident and service populations is lower than the rate of their projected increases.

However, because the General Plan would result in an increase in criteria pollutant emissions and would conflict with the primary goals of the 2017 Clean Air Plan. Given that the General Plan already includes policies that would help reduce impacts to the maximum extent feasible, the General Plan would have a significant and unavoidable impact, and there are no additional feasible mitigation measures.

As previously discussed, the GPU EIR determined impacts on air quality plans to be significant and unavoidable. The Project would be consistent with this analysis because it would not result in any development of in locations or at intensities beyond what was contemplated in connection with the General Plan. In addition, there is no new information of substantial importance than identified within the GPU EIR regarding local air quality plans. Therefore, the Project would not result in a more severe air quality impact than was identified in the GPU EIR.

b) Criteria Pollutants: The GPU EIR concluded this impact to be significant and unavoidable. In general, air quality impacts from projects are the result of emissions from area sources (landscaping and consumer products), energy (natural gas and electricity), transportation (on-road mobile sources), and from short-term construction activities.

The proposed Project includes updates to a policy document and would not directly result in physical development in the City that would generate emissions. In addition, the sites identified for future development in the Housing Element Update are consistent with the uses and intensities analyzed in the GPU EIR. Thus, no new or more severe impact as compared to the GPU EIR would result.

The General Plan is programmatic and does not propose any specific development projects. Rather, construction of development would occur incrementally throughout a 20-year period. As mentioned in the GPU EIR, the timing and intensity of future development projects is not known, the precise effects of construction activities associated with buildout of the Planning Area cannot be accurately quantified in the GPU EIR. Project-specific details of future development within the Planning Area is currently unknown, and such development would be driven by market conditions, site constraints, land availability, and property owner interest. However, as described in Section 3.2.2.1 of the GPU EIR, Methods for Analysis, it is anticipated that in any given year, multiple land use development projects would be constructed within the Planning Area.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to non-attainment criteria pollutants.

Given that the General Plan incorporates policies that meet each of the applicable control strategies intended to achieve regional attainment of national ambient air quality standards (NAAQS) and California ambient air quality standards (CAAQS), all feasible mitigation measures would be applied through implementation of the General Plan. However, because the effect of these reductions cannot be quantified and in consideration of the extent by which the General Plan exceeds some of Bay Area Air Quality Management District (BAAQMD's) significance thresholds as outlined in the GPU EIR, the GPU EIR concluded that implementation of the General Plan would result in a significant and unavoidable impact on criteria pollutants for which the region is in nonattainment.

The Project would be consistent with the analysis within the GPU EIR because it would not result in any development of in locations or at intensities beyond what was contemplated in connection with the General Plan. In addition, there is no new information of substantial importance than identified within the GPU EIR. Therefore, the Project would not result in a more severe air quality criteria pollutant impact than was identified in the GPU EIR.

c) Sensitive Receptors: The GPU EIR concluded this impact to be significant and unavoidable. The general plan implementation would allow growth of residential land uses that would be new sensitive receptors and non-residential land uses that are a potential for new emissions sources, as well as increase traffic volumes that exacerbate existing mobile sources. Policies within General Plan establish buffers between potential air pollution sources and sensitive receptors and limit pollution during construction. Other exposure reduction strategies including requirement of air filters, expansion of urban forestry, speed reduction, and traffic management, would minimize the General Plan's contribution to existing sources as well as protect future sensitive receptors. Future development would be subject to individual review; new sources would be evaluated through the BAAQMD permit process and/or the CEQA process to identify and mitigate any significant exposures.

Because the proposed Project would not allow development of uses or intensities that differs from the General Plan, future development consistent with the Project would not generate pollutants or odors or adversely affect a substantial number of people beyond what was analyzed in the GPU EIR. No additional impact would result. The Project implementation will not, in and of itself, result in impacts to air quality or plans for air quality or produce pollutants or odors.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to sensitive receptors. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not result in any development of in locations or at intensities beyond what was contemplated in connection with the General Plan. In addition, there is no new information of substantial importance than identified within the GPU EIR. Therefore, the Project would not result in a more severe air quality sensitive receptor impact than was identified in the GPU EIR.

d) Other emissions: As previously discussed, the GPU EIR determined less than significant impacts from objectionable odors. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

Conclusion

With regards to the issue area, the following findings can be made:

1. No peculiar impacts to the Project or the housing opportunity sites have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

Biological Resources

Would the project:

Issues and Supporting Evidence	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community, including oak woodland, identified in local or regional plans, policies or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐
c. Have a substantial adverse effect on state or federally protected wetlands, (including, but not limited to, marsh, vernal pool, coastal wetlands, etc.), through direct removal, filling, hydrological interruption or other means?	☐	☐	☐
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan?	☐	☐	☐

Discussion

As previously identified, the Housing Element Update is a policy document that would not directly result in the construction, modification, or improvement of residential development in the City. In addition, the sites identified in the Housing Element are consistent with the General Plan's use and intensity designations; therefore, their development would not have an adverse effect on any species identified as candidate, sensitive, or special status beyond those identified in the GPU EIR.

a) Sensitive Species: According to the GPU EIR twenty-eight special-status plant species, twenty special-status wildlife species and eleven special-status fish have a moderate or high potential to be in the General Plan study area. Special-status plants, wildlife and fish species and their potential habitat could be affected by future development under updated General Plan land use designations. Future development could result in the direct removal of special-status plants, wildlife and fish species and/or the loss or disturbance of habitat types that could support special status species.

- Because development under the General Plan would occur primarily within previously disturbed areas, impacts on plants would not be substantial. In addition, the General Plan includes policies that emphasize the conservation and protection of biological resources.
- Implementation of these General Plan policies help preserve existing natural habitats and reduce the direct and indirect effects on special-status plants resulting potential development under land use designations in the General Plan. In addition, all future developments under the General Plan is subject to review under CEQA and to permitting requirements for impacts on special-status plants. This impact would has been determined to be less than significant in the GPU EIR, and no additional mitigation is required for activities associated with the General Plan.

According to the GPU EIR, future development allowed under the General Plan update would occur primarily within previously disturbed areas, impacts on plants would not be substantial. In addition, the General Plan includes policies that emphasize the conservation and protection of biological and natural resources including riparian corridors, wetlands, and open space areas in and around the City to preserve and enhance plant and wildlife habitats. Goals and policies of the General Plan also recognize and support the preservation of rare, endangered, and threatened species, support efforts for preserving open spaces and unique and fragile biological environments and biological environments. Together, these goals and policies will help minimize, avoid, and compensate for potential development under the General Plan and the associated impacts on special-status plants and species. For these reasons, GPU EIR concluded that the impacts of the General Plan would be less than significant, and no mitigation was required.

The Project would facilitate housing production in locations and at intensities that are consistent with the use designations and development standards included in the General Plan. Accordingly, the Project would be consistent with the analysis within the GPU EIR and the Project would not result in a new or more severe impact with respect to sensitive species as compared with the analysis in the GPU EIR.

b) Riparian Habitat: The GPU EIR concluded this impact to be less than significant. Valley foothill

riparian and sensitive oak woodland (blue oak, coast live oak, and valley oak) communities in the General Plan study area are primarily in parks or previously developed areas that would not be affected by General Plan land use designations. However, some riparian and oak woodland habitat in areas planned for development could be affected under the General Plan. Development activities and future use of these areas associated with land use designations could result in direct effects, such as the loss or disturbance of these communities. Indirect effects that could occur as a result of increased human presence in formerly natural areas include habitat disturbance from human access, encroachment into roots of trees, and increased dust from development encroaching on natural areas.

Future development allowed under the General Plan is primarily within previously disturbed areas. In addition, policies in the Land Use Element maintain a compact urban form to promote a distinct community identity, and protect open space, and natural and agricultural resources surrounding the community. Goals and policies in Natural Resources Element, manage natural resources, including riparian corridors, wetlands, and open space areas in and around the City to preserve and enhance plant and wildlife habitats and support the preservation of rare, endangered, and threatened species and support efforts for preserving open spaces and unique and fragile biological environments and biological environments around the City. Together these goals and policies assist to minimize, avoid, and compensate for potential impacts from development allowed under the General Plan on special-status wildlife and their habitats. With implementation of these policies and adherence to Project-level CEQA analysis, the GPU EIR concluded that the General Plan would result in less than significant impacts, and no mitigation was required.

The Project would facilitate housing production in locations and at intensities that are consistent with the use designations and development standards included in the General Plan. Accordingly, the Project would be consistent with the analysis within the GPU EIR and the Project would not result in a new or more severe impact with respect to riparian habitat as compared with the analysis in the GPU EIR.

c) Wetlands: According the GPU EIR, State and federally protected wetlands and non-wetland waters (riverine, freshwater emergent wetlands, saltwater emergent wetlands) in the study area are primarily in conservation areas, parks or previously developed areas that would not be affected by General Plan land use designations. The General Plan includes policies that emphasize the conservation and protection of biological resources. Implementation of these updated policies, as well as the required project-level review under CEQA and permitting requirements, would reduce the potential effects of the General Plan direction on state and federally protected wetlands and non-wetland waters to a less-than-significant level, and no mitigation is required.

Future development under the General Plan would occur primarily within previously disturbed areas. In addition, the General Plan includes several goals and policies that emphasize the conservation and protection of biological resources. Policies in the Natural Resources Element, manage natural resources, including riparian corridors, wetlands, and open space areas in and around the City to preserve and enhance plant and wildlife habitats. Other goals Goal and policies in the Natural Resources Element, recognize and support the preservation of rare, endangered, and threatened species, support efforts for preserving open spaces and unique and fragile biological environments and biological environments around the City. Together these goals and policies assist to minimize, avoid, and compensate for potential impacts from development allowed under the General Plan on and help minimize, avoid, and compensate for potential development impacts on special-status fish

and their habitats. With implementation of these policies, the GPU EIR concluded that implementation of the General Plan would result in a less than significant impact, and no additional mitigation was required.

The Project would facilitate housing production in locations and at intensities that are consistent with the use designations and development standards included in the General Plan. Accordingly, the Project would be consistent with the analysis within the GPU EIR and the Project would not result in a new or more severe impact with respect to wetlands as compared with the analysis in the GPU EIR.

d) Wildlife Corridors: According to the GPU EIR, development under the General Plan could interfere with the movement of native wildlife species, particularly in the south portion of the General Plan study area where an Essential Connectivity Area (ECA) has been identified. Development activities and future use of these areas associated with land use designations could result in direct effects on wildlife movement, such as vehicle strikes or new physical barriers. Indirect effects that could occur as a result of increased human presence in formerly natural areas include habitat disturbance from human access, new or increased lighting and noise, and increased dust from development encroaching on natural areas. Although the corridor would be reduced from these land use changes, most of the existing corridor immediately to the north and south of these areas would be maintained as open space areas, and the corridor would not be fragmented or blocked by the proposed changes.

- Development allowed under the General Plan use would occur primarily within previously disturbed areas. Native wildlife nursery sites (e.g., nest or roost sites, burrows) could be removed or disturbed by development that is conducted as a result of land use designations. Removal or disturbance of nursery areas could result in injury and mortality of special-status species, as well as disruption of normal behaviors that could reduce reproductive output and overall survivorship. Land use designations could result in small areas of vineyard, grassland, oak woodland, and riverine areas being converted to other uses. However, most of the large natural and open space areas, including riparian corridors and wetland areas, will not be affected.
- The land use designations and subsequent development would not create a physical or water quality barrier or impediment that would interfere with the movement or migration of fish because no new structures would be constructed, nor would any water quality degradation occur, that would have the capacity to interrupt or impede the movement or migration of fish in the area.

The General Plan update includes policies that emphasize the conservation and protection of biological resources. Policies in the Land Use Element, maintain a compact urban form to promote a distinct community identity, and protect open space, and natural and agricultural resources surrounding the community. The Natural Resources Element goals and policies, manage natural resources, including riparian corridors, wetlands, and open space areas in and around the City to preserve and enhance plant and wildlife habitats, recognize and support the preservation of rare, endangered, and threatened species, and support efforts for preserving open spaces and unique and fragile biological environments and biological environments around the City. Together these goals and policies minimize, avoid, and compensate for potential development impacts allowed under the General Plan on fish and wildlife movement and the use of native wildlife nursery sites and fish spawning habitat.

Implementation of these policies under the General Plan reduces the potential effects on fish and wildlife movement and the use of native wildlife nursery sites. With implementation of these policies, the GPU EIR concluded that this impact would be less than significant, and no mitigation was required.

The Project would facilitate housing production in locations and at intensities that are consistent with the use designations and development standards included in the General Plan. Accordingly, the Project would be consistent with the analysis within the GPU EIR and the Project would not result in a new or more severe impact with respect to wildlife corridors as compared with the analysis in the GPU EIR.

e) Local Policies: Municipal Code Chapter 12.45 Trees on Private Property requires preservation of significant trees and permitting for impacts on, or removal of, these trees. Municipal Code 16.36.110 Resource Areas requires avoidance and mitigation for impacts on sensitive biological resources, including plants, wildlife, and habitats. Municipal Code 17.16.050 Special findings required for AR district projects requires protection of natural resources within areas designated in the General Plan as a resource area. Municipal Code 17.52.110 Creeks and Other Watercourses requires streambanks stabilization and setbacks to be part of new development for the protection and enhancement of riparian habitat corridors.

The policies in the General Plan do not conflict with any existing City policies or ordinances protecting biological resources; rather they address sensitive biological resources. Adopted General Plan policies protect trees, sensitive biological resources, creeks, and riparian corridors. In addition, new development would still need to be constructed in compliance with existing codes. Therefore, there would be no impact, and no mitigation is required.

As the proposed Project would have no impact for the reasons detailed above, the Project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

Conclusion

With regards to the issue area, the following findings can be made:

1. No peculiar impacts to the Project or the housing opportunity sites have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

Cultural Resources

Would the project:

Issues and Supporting Evidence	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	☐	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☐	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☐

Discussion

The Housing Element identifies sites designated for residential development that were previously evaluated for potential impacts to cultural resources in the GPU EIR. The Housing Element is not identifying any additional sites for residential development or changing density standards as compared with the General Plan.

The Housing Element will not, in and of itself, result in impacts to cultural resources, including historic, archeological, and paleontological resources. At such time that a development proposal is considered, that project will be subject to adopted development guidelines/standards.

a) Changes to Cultural Resources: The General Plan includes goals and policies pertaining to cultural resources. Although the concentration of future development in already urbanized areas and circulation improvements may indirectly increase the number of projects entailing the demolition, alteration, or relocation of CEQA historical resources. Furthermore, the General Plan provides additional goals and policies intended to encourage rehabilitation, sensitive use adaptations, and flexible reuse to minimize adverse changes to historical resources.

The General Plan also includes policies and goals that would provide better documentation and review of historic resources in order to better protect known and as of yet unknown historic resources. Policies encourage the preservation and reuse of historic resources including using sustainable “green” building and rehabilitation practices and protection of historic resources, where

possible. Policies also protect historic resources by ensuring surveys and records of existing and as-of-yet unknown resources are performed following state, federal, and private guidelines by qualified persons and are updated regularly.

Any projects resulting from the promotion of increased urban density, or the improvement of transportation networks require project-level review. Therefore, the impact of implementation of the General Plan on cultural and historical resources is considered than significant with implementation of existing regulations and the adopted goals and policies under the GPU EIR.

The Project would facilitate housing production in locations and at intensities that are consistent with the use designations and development standards included in the General Plan. Accordingly, the Project would be consistent with the analysis within the GPU EIR and the Project would not result in a new or more severe impact with respect to cultural resources as compared with the analysis in the GPU EIR.

b) Changes to Archeological Resources: Archaeological resources are known to be present in the General Plan study area as identified through the Northwest Information Center (NWIC) record search results from the GPU EIR effort. Consequently, it is possible that future development, redevelopment, and construction activities proposed under the General Plan may result in direct or indirect impacts on both prehistoric and historic archaeological resources.

If archaeological resources are present in the areas where development is planned, they could be damaged by earth-disturbing construction activities, such as excavation for foundations, placement of fill, trenching for utility systems, and grading for roads and staging areas. Additionally, transportation improvements could restrict access to previously accessible locations that are important to Native Americans.

Specific analysis is required under CEQA when individual projects are proposed. In general, however, causing a substantial adverse change in the significance of an archaeological resource that has the potential to yield information important to the prehistory or history of the local area, California, or the nation in general, is considered significant. With implementation of the policies under the General Plan, the GPU EIR concluded that this impact would be reduced to a less-than-significant level without the need for mitigation measures.

The Project would facilitate housing production in locations and at intensities that are consistent with the use designations and development standards included in the General Plan. Accordingly, the Project would be consistent with the analysis within the GPU EIR and the Project would not result in a new or more severe impact with respect to archeological resources as compared with the analysis in the GPU EIR.

c) Disturbance of human remains: The General Plan study area is located in an area inhabited by Native Americans during pre-European times. Accordingly, Native American burials may be found in the future on sites where no record of such burials exists. Buried human remains that were not identified during previous research and field studies could be inadvertently unearthed during ground-disturbing

activities, possibly resulting in damage to the human remains. Accordingly, human remains could be damaged or destroyed by future development related to buildout under the General Plan. In the absence of regulations, this impact would be significant.

The treatment of Native American human remains is regulated by Public Resources Code Section 5097.98, as amended by Assembly Bill 2641, which addresses the disposition of Native American burials, protects remains, and appoints the Native American Heritage Commission (NAHC) to resolve disputes. In addition, California Health and Safety Code Section 7050.5 includes specific provisions for the protection of human remains in the event of discovery, and Section 7052 makes the willful mutilation, disinterment, or removal of human remains a felony. The Health and Safety Code is applicable to any project where ground disturbance would occur.

Policy HCR 15-2 of the General Plan establishes City policies and procedures that require development projects to comply with state and federal law that upon discovery of Native American remains or archaeological artifacts during construction, all activity will cease until qualified professional archaeological examination and reburial in an appropriate manner is accomplished. Policy HCR 15-3 in the General Plan further reduces the potential impact on archaeological and tribal cultural resources, including human remains, by requiring collaboration with local Tribal Nations on treatment protocols for handling human remains and cultural items affiliated with affected Tribal Nations.

The GPU EIR concluded that the impact of implementation of the General Plan on human remains would be less than significant with implementation of existing State regulations and General Plan policies HCR 15-2 and HCR 15-3.

The Project would facilitate housing production in locations and at intensities that are consistent with the use designations and development standards included in the General Plan. Accordingly, the Project would be consistent with the analysis within the GPU EIR and the Project would not result in a new or more severe impact with respect to human remains as compared with the analysis in the GPU EIR.

Conclusion

With regards to the issue area, the following findings can be made:

1. No peculiar impacts to the Project or the housing opportunity sites have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

Energy

Would the project:

Issues and Supporting Evidence	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?	☐	☐	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐

Discussion

All of the Housing Element's housing opportunity sites are consistent with the General Plan's use and intensity designation. Therefore, the Project would not result in impacts to energy resources or renewable energy or energy efficiency planning that differ from the impacts analyzed in the GPU EIR.

a) Consumption of Energy Resources: Construction associated with future developments under the General Plan will consume gasoline and diesel fuel through operation of heavy-duty, off-road construction equipment and on road vehicles. The amount of fuel consumed by these activities will vary substantially depending on the level of activity, length of the construction period, specific construction operations, types of equipment, and number of personnel. Because the General Plan does not propose any specific development projects, the precise level and intensity of construction activities that would occur in the Planning Area through 2040 is not known.

The GPU EIR assumed that the types of land uses envisioned under the General Plan, will involve construction activities typical of most land use developments within the Planning Area and in the San Francisco Bay Area Air Basin. Because construction emissions from both mobile and stationary sources are relatively short-term emissions that would cease once construction of a project is complete, they would represent a relatively short demand on local and regional fuel supplies that would be easily accommodated. Additionally, Executive Order (EO) N-79-20 (EO N-79-20) establishes a goal to transition to 100 percent zero-emission off-road vehicles and equipment by 2035 where feasible. EO N-79-20 directs CARB to develop regulations that will help achieve these goals. The City will require developers to adhere to EO N-79-20 for future development. Therefore, construction activities

associated with the General Plan would not result in a wasteful, inefficient, and unnecessary usage of direct or indirect energy.

The GPU EIR recognizes that future development under the General Plan will generate vehicle trips once operational, which would consume gasoline and diesel. Future development will also result in the consumption of electricity and natural gas for power, heating, and cooking. While the number of residential units and commercial and industrial square footage will increase under the General Plan, total energy use is anticipated to decrease, primarily due to Napa's delivery of energy through Marin Clean Energy (MCE), which has much higher goals for renewable energy than PG&E, and the increase in fuel efficiency for vehicles will result as more vehicles are designed to meet stricter Pavley standards come into use.

In addition, the General Plan includes goals and policies, in the Climate Change and Sustainability Element aimed at reducing energy consumption and consequently would help decrease GHG emissions.

While many of the policies within the General Plan do not set specific and quantifiable goals, they do address general concepts such as increasing energy efficiency and renewable energy, encouraging bicycle and pedestrian transit, decreasing car use by tourists, and more. When implemented, these actions will further decrease energy consumption from natural gas, electricity, and gasoline and diesel fuels. By decreasing demand for energy- and fuel-related energy resources both overall and on a per service population basis, land uses, and future growth associated with the General Plan will not result in a wasteful, inefficient, and unnecessary usage of direct or indirect energy. Therefore, this impact is considered less than significant.

As previously discussed, the GPU EIR determined impacts to energy resources to be less than significant. The Project would be consistent with this analysis because it would not result in any development of in locations or at intensities beyond what was contemplated in connection with the General Plan. In addition, there is no new information of substantial importance regarding energy consumption that was not known with the GPU EIR was prepared. Therefore, the Project would not result in a more severe energy impact than was identified in the GPU EIR.

b) State or Local Energy Plans: According to the GPU EIR, all future development under the General Plan will be required to comply with the latest California Building Code (CBC) requirements, including CBC Energy Efficiency Standards, as well as all federal, state, and local rules and regulations pertaining to energy consumption and conservation. The General Plan includes policies that emphasize energy reduction strategies and does not contain policies that will conflict with existing energy conservation regulations.

Through implementation of General Plan policies, the General Plan will support the CARB passenger vehicle GHG emissions reduction targets through measures that would reduce VMT in the Planning Area. Additionally, CARB's low carbon fuels standard, which aims to reduce the full fuel-cycle, carbon intensity of the transportation fuel pool used in California, would further assist in meeting established energy reduction goals and GHG emission reduction targets. Therefore, impacts would be less than significant.

As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR.

Conclusion

With regards to the issue area, the following findings can be made:

1. No peculiar impacts to the Project or the housing opportunity sites have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

Geology and Soils

Would the project:

Issues and Supporting Evidence	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death, involving:	☐	☐	☐
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐
ii) Strong seismic ground shaking?	☐	☐	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐
iv) Landslides?	☐	☐	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐
Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐

Discussion

The Housing Element identifies sites designated for residential development that were previously evaluated for potential geological impacts in the GPU EIR. The Housing Element is not identifying any additional sites for residential development or changing density standards.

a) Exposure of people or structures: If future structures as a result of General Plan implementation are located on or near an active fault, rupture of that fault could cause damage or destruction of the structure, resulting in injury, loss of life, or property damage. If a proposed project would exacerbate risk of surface fault rupture, seismic ground shaking, seismic-related ground failure, or seismic-related landslide, this would be a significant impact. According to the GPU EIR, the West Napa fault zone crosses the western portion of the city. However, development conducted under the General Plan will not increase seismic stresses. In addition, Policy SN 1-1 of the General Plan requires setbacks from seismic hazards, especially in areas that are prone to earthquakes and landslides. Policy SN 1-3 of Goal SN-1 of the General Plan requires that a geotechnical report be prepared, and its mitigation measures be incorporated into the design. These policies are implemented through the regulation and development review process, which requires that all construction comply with the CBC. The GPU EIR concluded that the impact is less than significant, and no mitigation is required.

As any development that occurs consistent with the proposed Project would be subject to General Plan Policies SN 1-1 and SN 1-3, and because the Project's housing opportunity sites are consistent with the use and intensity designations allowed by the General Plan, the Project would be consistent with the analysis within the GPU EIR. In addition, there is no new information of substantial importance than identified within the GPU EIR. Therefore, the Project would not result in a more severe geology impact with respect to exposure of people or structures to hazards than was identified in the GPU EIR.

b) Soil Erosion: Ground-disturbing earthwork associated with projects constructed under the General Plan may increase erosion rates, potentially causing accelerated erosion. Construction activities can cause ground disturbance and vegetation removal at construction sites, exposing soil to rain and wind and potentially causing accelerated erosion, thereby resulting in significant impacts. However, Chapter 8.36.120 of the City's Municipal Code requires compliance with the City's grading ordinance and National Pollutant Discharge Elimination System (NPDES) permit, ensuring preparation of a stormwater pollution prevention plan (SWPPP) and issuance of a grading permit for all construction projects, as required by the Central Valley Regional Water Board and the City's municipal code. These policies are implemented through the regulation and development review process, which requires that all construction comply with the CBC. Compliance with the federal and local erosion-related regulations applicable to projects carried out under the General Plan (i.e., the SWPPP that is developed for the site and the requirements of the City's municipal code) would ensure that construction activities as a result of the General Plan will not result in significant erosion impacts. The GPU EIR concluded that the impact would be less than significant, and no mitigation is required.

As any development that occurs consistent with the Project would be subject to the same federal, state, and local policies analyzed in the GPU EIR, and because the Project's housing opportunity sites are

consistent with the use and intensity designations allowed by the General Plan, the Project would be consistent with the analysis within the GPU EIR. In addition, there is no new information of substantial importance than identified within the GPU EIR. Therefore, the Project would not result in a more severe geology impact with respect to soil erosion than was identified in the GPU EIR.

c) Unstable Soil: In addition to seismic-related ground failure described above, construction in areas with the potential to exacerbate risk of nonseismic-related landsliding caused by heavy precipitation or improper grading or cuts could also expose people or structures to potential substantial adverse effects. However, the City is fairly level; moreover, policies of the General Plan require that geotechnical studies be prepared, and its mitigation measures be incorporated into the design. In addition to the General Plan policies geotechnical mitigation is implemented through the regulation and development review process, requiring that all construction comply with the CBC, which addresses engineered fills and cuts. As a result the GPU EIR considers this impact less than significant, and no mitigation is required.

As discussed under the Land Subsidence analysis of the GPU EIR, subsidence has not occurred in the City. Future development under the General Plan will not include groundwater extraction or substantial dewatering that would result in subsidence. Subsidence as a result of peat loss or oil extraction is not an issue in Napa; therefore, the General Plan considers this impact less than significant, and no mitigation is required.

As previously discussed, the GPU EIR determined impacts to soils to be less than significant. The Project would be consistent with this analysis because it would not result in any development in locations or at intensities beyond what was contemplated in connection with the General Plan. In addition, there is no new information of substantial importance regarding soils that was not known when the GPU EIR was prepared. Therefore, the Project would not result in a more severe impact than was identified in the GPU EIR.

d) Expansive soils: According to the GPU EIR, expansive soils occur in the City, and structures built on expansive soils are subject to the expansion and contraction of these soils, which could cause structural damage if the subsoil, drainage, and foundation are not properly engineered. However, soil sampling and treatment procedures for expansive soils, as well as other soil-related issues, are addressed by the CBC. Compliance with the CBC will create conditions suitable for construction. According to the GPU EIR, this impact would be less than significant, and no mitigation is required.

As previously discussed, the GPU EIR determined impacts as a result of expansive soils to be less than significant. The Project would be consistent with this analysis because it would not result in any development in locations or at intensities beyond what was contemplated in connection with the General Plan. In addition, there is no new information of substantial importance regarding expansive soils that was not known when the GPU EIR was prepared. Therefore, the Project would not result in a more severe impact than was identified in the GPU EIR.

e) Septic tanks or alternative wastewater disposal systems: According to the GPU EIR, improperly located or designed septic systems could cause water quality issues, and as discussed under Suitability for Alternative Wastewater Disposal Systems in the EIR. Most soils in the City are not suitable for use of septic tanks or alternative wastewater disposal systems. The septic system's design depends on the permeability and other aspects of the soil in which it will be constructed. The Napa Sanitation District (NapaSan) provides customers within its service boundary with wastewater disposal. NapaSan owns and operates the sanitary sewer collection system and wastewater treatment plant that serves the City. Future development under the General Plan will be served by NapaSan and would not involve installation of septic systems or other alternative wastewater disposal systems. The GPU EIR concluded that there would be no impact, and no mitigation is required.

As any development that occurs consistent with the proposed Project would be subject to the same federal, state, and local policies analyzed in the GPU EIR, and because the Project's housing opportunity sites are consistent with the use and intensity designations allowed by the General Plan, the proposed Project would be consistent with the analysis within the GPU EIR. In addition, there is no new information of substantial importance than identified within the GPU EIR. Therefore, the Project would not result in a more severe geology impact with respect to septic tanks and alternative wastewater disposal than was identified in the GPU EIR.

Conclusion

With regards to the issue area, the following findings can be made:

1. No peculiar impacts to the Project or the housing opportunity sites have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

Greenhouse Gas Emissions

Would the project:

Issues and Supporting Evidence	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐

Discussion

The Housing Element identifies sites designated for residential development that were previously evaluated for potential GHG impacts in GPU EIR. The Housing Element is not identifying any additional sites for residential development or changing density standards. In addition, the Housing Element contains policies and programs intended to further the goals of reducing GHG emissions resulting from new development.

a) Greenhouse Gas Emissions: The GPU EIR analyzes Greenhouse Gas Emissions (GHG) for Construction and Operational emissions. Each topic is described below.

Construction: The General Plan does not propose any specific development projects, but construction of land use developments allowable under the General Plan would occur intermittently over the course of the 20-year buildout period. As the timing and intensity of future development projects are not known at this time, the precise effects of construction activities associated with buildout of the Project cannot be quantified at this time. Project-specific details of future development within the Planning Area is unknown because development is driven by market conditions, site constraints, land availability, and property owner interest. It is assumed that implementation of the General Plan could result in a net new development of up to 7,800 residential units; 817,000 square feet of office uses; 1,799,000 square feet of industrial uses; and 631,000 square feet of retail uses. In the GPU EIR it is anticipated that in any given year, multiple land use development projects will be constructed within the City.

Future development including housing units accounted for in the housing element would be required to comply with policies proposed as part of the General Plan that would reduce GHG emissions from

construction, including NRC 5-4, which would require contractors to use best management practices (BMPs) to reduce emissions associated with construction activities and CCS 1-2, which calls for City to develop plans to reduce fossil fuel consumption in construction and requires that construction for municipal projects use sustainable construction practices. Additionally, Policy CCS 8-1 calls for green building practices, construction debris and waste diversion, and demonstrate high performance building standards. Given that the General Plan policies would require future development to comply with BMPs and that other policies would further reduce construction-related GHG emissions, the GPU EIR concludes that impacts due to short-term construction emissions would be less than significant.

Operation: According to the GPU EIR operation of land uses supported by the General Plan would generate direct and indirect GHG emissions. Sources of direct emissions include mobile vehicle trips, natural gas combustion, and landscaping activities. Indirect emissions would be generated by electricity generation and consumption, waste and wastewater generation, solid waste, and water use.

The GPU EIR estimates operational emissions generated by the General Plan would result in a net reduction in annual emissions by 62,026 MT CO₂e compared to existing conditions. The annual emission changes reflect policies such as reductions in parking, commuting, water use and waste generation as well as diversification of land uses due to new mixed-use designations, which would reduce VMT. The GPU EIR further states the effects of General Plan policies would reasonably have additional mitigating potential and would further reduce GHG emissions, though it is unlikely that these reductions would be on the scale needed to offset mass emissions in the future.

Because the City of Napa does not have a Qualified GHG Reduction Strategy (i.e., a climate action plan), the General Plan has been analyzed quantitatively in the GPU EIR to evaluate potential significant impact on the environment due to GHG emissions. The GPU EIR's quantified estimates of the General Plan's operational emissions demonstrated that it would result in a significant impact.

Unquantified construction emissions would further contribute to the overall total, though qualitatively less-than-significant when considered alone. As such, the City has preemptively determined that it is necessary to adopt a climate action plan as a Qualified GHG Reduction Strategy in order to ensure that the City and General Plan would further the State's and region's GHG reduction goals. Proposed General Plan Policy CCS 1-5 tasks the City to work with BAAQMD and other relevant agencies and partners to adopt a climate action plan as a Qualified GHG Reduction Strategy to address the GHG reduction goals of EO B-55-18, SB 32, and EO S-03-05. Implementation of this policy would lower the General Plan's impacts below both BAAQMD's current and proposed plan-level significance thresholds for GHG. However, because implementation of this policy (i.e., adoption of a Qualified GHG Reduction Strategy) cannot be guaranteed, the GPU EIR concluded that this impact is significant and unavoidable.

As any development that occurs consistent with the proposed Project would be subject to the same federal, state, and local policies analyzed in the GPU EIR, and because the Project's housing opportunity sites are consistent with the use and intensity designations allowed by the General Plan, the proposed Project would be consistent with the analysis within the GPU EIR. In addition, there is no new information of substantial importance than identified within the GPU EIR. Therefore, the Project

would not result in a more severe impact with respect to greenhouse gas emissions than was identified in the GPU EIR.

b) Conflict with an applicable plan, policy, or regulation: The General Plans includes numerous policies that support all applicable Plan Bay Area strategies, and General Plan policies could achieve net reductions in GHG emissions and otherwise implement a Qualified GHG Reduction Strategy to meet targets established by EOs S-3-05 and B-55-18. However, due to the scale of emissions reductions needed to comply with these targets and given that adoption of a Qualified GHG Reduction Strategy cannot be guaranteed, as also discussed above, this impact would be significant and unavoidable.

As any development that occurs consistent with the proposed Project would be subject to the same federal, state, and local policies analyzed in the GPU EIR, and because the Project's housing opportunity sites are consistent with the use and intensity designations allowed by the General Plan, and because the Project includes additional policies intended to promote housing production in a way that would reduce greenhouse gas emissions, the proposed Project would be consistent with the analysis within the GPU EIR. In addition, there is no new information of substantial importance than identified within the GPU EIR. Therefore, the Project would not result in a more severe impact with respect to conflicts with greenhouse gas plans, policies, or regulations than was identified in the GPU EIR.

Conclusion

With regards to the issue area, the following findings can be made:

1. No peculiar impacts to the Project or the housing opportunity sites have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

Hazards and Hazardous Materials

Would the project:

Issues and Supporting Evidence	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
a) Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials?	☐	☐	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐
e) For a project located within an airport land use plan area or, where such a plan has not been adopted, within two miles of a public airport or a public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐
f) Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐

Discussion

The Housing Element identifies sites designated for residential development that were previously evaluated for potential impacts from hazards and hazardous materials in the GPU EIR. The Housing Element is not identifying any additional sites for residential development or changing density standards.

a) and b) Transportation of hazardous material and accidents involving release: According to the GPU EIR, development under the General Plan will involve the transport, use, storage, generation, and disposal of hazardous materials, including lead and asbestos from building materials, chemicals from commercial uses, or fertilizers and pesticides from agricultural uses. Many businesses in the city currently use hazardous materials and generate hazardous wastes, which require regulatory oversight to protect human health and the environment.

These uses are regulated by the Napa County Planning Building and Environmental Services under state and federal laws and regulations, including California Department of Toxic Substances Control (DTSC), which regulates the generation, transport, and disposal of hazardous waste, and the State Water Resources Control Board, which enforces the Clean Water Act and protects the quality of ground and surface waters. Routine transport of hazardous materials on State Routes 29 and 121 are regulated and monitored by USDOT, Caltrans, and the California Highway Patrol.

Households in the city could also typically use small quantities of potentially hazardous materials for garden care and building maintenance, including but not limited to, garden chemicals, paints, solvents, and car care products. Similar materials are also maintained for public buildings and uses, such as the City Corporation Yard and City Hall. CCR Title 27 regulates waste disposal, including hazardous materials, to reduce exposure to potential hazards.

Although the use and storage of hazardous materials releases cannot feasibly be eliminated, the requirements of existing regulatory programs combined with implementation of General Plan policies will reduce potential impacts of routine transport, use, or disposal of hazardous materials and reasonably foreseeable upset or accident conditions to a less than- significant level.

According to the GPU EIR, construction equipment that is typically used for development projects has the potential to release oils, greases, solvents, and other finishing materials through accidental spills. Given the nature of hazardous materials that would be used, stored, or disposed of (e.g., materials for construction equipment, contaminated soil), there is a possibility for upset and accident conditions involving the release of hazardous materials into the environment. Accidental releases of small quantities of these substances could contaminate soils and degrade the quality of surface water and groundwater, resulting in a public safety hazard.

However, the handling and disposal of these materials would be governed according to regulations enforced by the Napa Fire Department, Certified Unified Program Agency (CUPA), California Division of Occupational Safety and Health (Cal/OSHA), and DTSC. In addition, regulations under the federal Clean Water Act require contractors to avoid allowing the release of materials into surface waters as

part of their SWPPP and National Pollutant Discharge Elimination System (NPDES) permit requirements (Outlined in Section 3.9, Hydrology and Water Quality of the GPU EIR).

According to the GPU EIR, it is not anticipated that the use of hazardous materials during construction would result in a reasonably foreseeable upset or accident condition that would cause a significant hazard to the public or environment. Because compliance with the existing regulatory scheme would be required for all future development to avoid or minimize impacts related to the release of hazardous materials into the environment, the GPU EIR concluded that this impact would be less than significant, and no mitigation was required.

As previously discussed, the GPU EIR determined impacts regarding the use and storage of hazardous materials from development allowed under the General Plan to be less than significant. The Project would be consistent with this analysis because it would not result in any development in locations or at intensities beyond what was contemplated in connection with the General Plan. In addition, there is no new information of substantial importance regarding this topic that was not known when the GPU EIR was prepared. Therefore, the Project would not result in a more severe impact than was identified in the GPU EIR.

c) Hazardous materials and waste within ¼ Mile of Schools: Implementation of the General Plan will lead to urban development and the intensification of land uses that could result in the release of hazardous emissions or entail the handling of hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school. The General Plan designates land uses for schools throughout the city. The General Plan does not explicitly incorporate policies to limit the use of hazardous materials near school sites or limit the development of proposed schools near existing contamination; however, Policy PHE 2-1 in the Public Health and Equity Element of the General Plan calls for the protection of sensitive receptors such as schools from impacts of stationary and non-stationary sources of pollution. The City also routinely consults with the school district prior to discretionary approval of new businesses and industry that use hazardous materials near existing school sites as part of the project review process. Additionally, school siting regulations implemented by the Department of Education prohibit locating proposed schools near existing contamination. Therefore, the GPU EIR concluded that the General Plan would result in a less than significant impact, and no mitigation was required.

As previously discussed, the GPU EIR determined release of hazardous emissions entailing the handling of hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school allowed under the General Plan to be less than significant. The Project would be consistent with this analysis because it would not result in any development in locations or at intensities beyond what was contemplated in connection with the General Plan. In addition, there is no new information of substantial importance regarding this topic that was not known when the GPU EIR was prepared. Therefore, the Project would not result in a more severe impact than was identified in the GPU EIR.

d) Hazardous Material Sites: As described in the GPU EIR, no hazardous material release sites have been identified on the most recent Cortese List in the City. There are six open LUST sites, 21 cleanup sites, and six Solid Waste Information System (SWIS) sites in the City. The City is not located on a Superfund or other National Priorities List (NPL) site; therefore, it would not result in a significant hazard to the public or the environment through exposure to such sites.

All future projects will be required to be consistent with the General Plan and will be subject to environmental review under CEQA. The General Plan will not change existing provisions regarding hazardous material sites. Existing regulations will ensure that sites containing hazardous materials be cleaned up to existing standards for the proposed land use prior to development. Under the GPU EIR, the General Plan's impact has been considered less-than-significant, and no mitigation was required.

As previously discussed, the GPU EIR determined hazardous material site impacts from development allowed under the General Plan to be less than significant. The Project would be consistent with this analysis because it would not result in any development in locations or at intensities beyond what was contemplated in connection with the General Plan. In addition, there is no new information of substantial importance regarding this topic that was not known when the GPU EIR was prepared. Therefore, the Project would not result in a more severe impact than was identified in the GPU EIR.

e) Airport Safety: According the GPU EIR, the closest public airport is the Napa County Airport located approximately 5 miles south of the City of Napa, outside the city. The very southern portions of the city are in Zones D and E of the Airport Land Use Compatibility Plan (ALUCP). Much of this land is open space or designated as agriculture/vineyard use; industrial uses and a lodging use are also present. In Zone D, aircraft can range from 300 to 1,000 feet above the ground, and residential uses, as well as uses hazardous to flights, are prohibited in this zone. In Zone E, the zone farthest from the airport, there is a low risk of accident, and noise impacts are much less and classified as overflight annoyance. The only prohibited uses in this zone are noise-sensitive outdoor uses. Overflight easements or deed notices may be required for other development uses in this zone.

An aircraft crash occurring within the city would be a potentially disastrous. Although arriving and departing planes from the Napa County Airport do pass over the city, these flight paths are generally over rural and agricultural areas. In addition, the Napa Fire Department has mutual aid agreements with other fire protection agencies, which could assist the city in the event of an accident. Thus, implementation of the General Plan will not alter safety conditions for people within the city. Under the GPU EIR, the General Plan's impact has been considered less than significant, and no additional mitigation is required.

As previously discussed, the GPU EIR determined airport safety impacts from development allowed under the General Plan to be less than significant. The Project would be consistent with this analysis because it would not result in any development in locations or at intensities beyond what was contemplated in connection with the General Plan. In addition, there is no new information of

substantial importance regarding this topic that was not known when the GPU EIR was prepared. Therefore, the Project would not result in a more severe impact than was identified in the GPU EIR.

f) Emergency Response/Evacuation: Development under the General Plan, including land uses and densities, has the potential to create obstacles to the implementation of emergency response or evacuation plans adopted for the City of Napa. Relevant emergency response or evacuation plans in the city include the Napa County Emergency Operations Plan and the City of Napa Hazard Mitigation Plan. Several General Plan policies and implementing actions address the reduction of risk due to hazards, which, in turn, reduces the impact of new development on emergency response plans. Policy SN 5-1 advises implementing best practices to aggressively address wildfire prevention on open space land. Policy SN 5-2 facilitates communication and education to the community on fire safety, wildland fire protection measures, and evacuation/emergency response to wildland fires. Policy SN 5-4 ensures that future development plans provide adequate evacuation routes. Policy SN 5-5 would require that the City regularly assess adequacy of emergency response and evacuation routes and identify need for road extensions to serve neighborhoods that do not have sufficient evacuation routes or access for emergency services. The GPU EIR concluded that adherence to existing regulations and the policies in the General Plan will reduce the General Plan's impact to less than significant and no mitigation was required.

As previously discussed, the GPU EIR determined impacts to emergency response and evacuation from development allowed under the General Plan to be less than significant. The Project would be consistent with this analysis because it would not result in any development in locations or at intensities beyond what was contemplated in connection with the General Plan. In addition, there is no new information of substantial importance regarding this topic that was not known when the GPU EIR was prepared. Therefore, the Project would not result in a more severe impact than was identified in the GPU EIR.

g) Wildland Fire Hazards: Several factors contribute to susceptibility to wildfire danger in Napa County: most notably climate, winds, vegetation, and water supply. Under the Fire and Resources Assessment Program (FRAP), CAL FIRE has designated areas within the city as non-very high fire hazard severity zone (NON-VHFHSZ). This indicates that the probability of a wildfire affecting the incorporated City is very low. The western and southeastern borders of the city are adjacent to moderate fire hazard severity zones, while the remaining northern, eastern, and southern portions of the city are undesignated.

As previously discussed, the GPU EIR determined wildland fire risk impacts from development allowed under the General Plan to be less than significant. The Project would be consistent with this analysis because it would not result in any development in locations or at intensities beyond what was contemplated in connection with the General Plan. In addition, there is no new information of substantial importance regarding this topic that was not known when the GPU EIR was prepared. Therefore, the Project would not result in a more severe impact than was identified in the GPU EIR.

Conclusion

With regards to the issue area, the following findings can be made:

1. No peculiar impacts to the Project or the housing opportunity sites have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

Hydrology and Water Quality

Would the project:

Issues and Supporting Evidence	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would:	☐	☐	☐
d) result in substantial erosion or siltation on- or off-site;	☐	☐	☐
e) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☐
f) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☐
g) impede or redirect flood flows?	☐	☐	☐
h) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐
i) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐

Discussion

The City regulates many aspects of construction and development through requirements and ordinances established in the city code. Implementation of the Housing Element will not increase impacts on water resources or the need for mitigation measures beyond those included in the GPU EIR.

The Housing Element will not, in and of itself, result in impacts to drainage, runoff, erosion, flooding, or natural disasters. Future development will result in the addition of new impervious surfaces to each specific development project site. However, this is a normal consequence associated with the development of previously undeveloped parcels of land. At such time that a development proposal is considered that project will be subject to adopted development guidelines/standards.

a) Water Quality Standards:

Construction: In addition to compliance with the latest NPDES and other water quality requirements (i.e., Construction General Permit, Small MS4 Permit, and the General Dewatering Permit) construction projects would also comply with other federal and State regulations, City standards, and other local ordinances, as noted in Section 3.9.1.1, Regulatory Setting. Compliance with grading permits and the NPDES Construction General Permit would require use of BMPs to restrict soil erosion and sedimentation and restrict non-stormwater discharges from the construction site as well as release of hazardous materials. As a performance standard, selected construction BMPs would represent the best available technology that is economically achievable and best conventional pollutant control technology to reduce pollutants. Therefore, potential construction-related water quality impacts, such as violations of water quality objectives, would be less than significant, and no mitigation is required.

Operation: At buildout, it is estimated that the General Plan will accommodate about 7,811 new housing units and up to 3,784,298 square feet of commercial and industrial uses. The intensification of land uses by implementation of the General Plan may increase impervious surface area and introduce new or additional pollutants to an existing area. Any increase in impervious areas that may occur as a result of the General Plan will increase the volume of runoff during a storm, which would more effectively transport pollutants generated during operation into receiving waters.

The General Plan includes implementation programs that would improve stormwater management in the city and reduce impacts on water quality. Implementation of the General Plan policies increases the emphasis on stormwater runoff reduction measures related to new development. Development of these management efforts as proposed in the General Plan's goals and policies would help address the causes of increased stormwater from development described above and help minimize the potential for the release of pollutants and violation of water quality standards. As described in General Plan Policy NRC.10-6, green infrastructure and sustainability strategies would be incorporated for new development in order to reduce stormwater runoff. Additionally, as described in General Plan Policy CSS 3-2, the City will require stormwater management techniques that minimize surface water runoff in public and private developments. Furthermore, compliance with regional, State, and federal regulations would reduce the potential for new development to result in violations of water quality

standards. Therefore, the GPU EIR concluded that the General Plan would result in less than significant impact, and no mitigation was required.

As previously discussed, the GPU EIR determined water quality impacts from development allowed under the General Plan to be less than significant. The Project would be consistent with this analysis because it would not result in any development in locations or at intensities beyond what was contemplated in connection with the General Plan. In addition, there is no new information of substantial importance regarding this topic that was not known when the GPU EIR was prepared. Therefore, the Project would not result in a more severe impact than was identified in the GPU EIR.

b) Groundwater Supplies:

Construction: For all future projects under the General Plan such as new housing construction may encounter groundwater. In the event groundwater is encountered during construction, dewatering would be conducted on a one-time or temporary basis during the construction phase and would not result in a loss of water that would substantially deplete groundwater supplies. After dewatering activities are completed, water levels would return to pre-construction conditions. The water supply for construction activities (e.g., dust control, concrete mixing, material washing) would most likely come from nearby hydrants and existing surface supplies and/or would be trucked to the site. Therefore, impacts would be less than significant, and no mitigation is required.

Operation: Land use designations and anticipated housing growth under the General Plan will result in increased water supply demand. However, the city does not rely on groundwater and would continue to meet water supply demands from three surface water sources: Lake Hennessey, Milliken Reservoir, and the State Water Project. The Napa Sanitation District also delivers recycled water to customers within the City's potable water service area; however, recycled water is mainly used for irrigation. Implementation of the General Plan will not result in a substantial depletion of groundwater resources from increased groundwater pumping or result in over-withdrawal.

The intensification of land uses by implementation of the General Plan may increase impervious surface area and thereby interfere with groundwater recharge. The city will encourage development projects to use Low Impact Development (LID) practices such as bioretention, porous paving, and rainwater harvesting systems to facilitate groundwater recharge. General Plan Policy CSS 3-1 will require the City to study and incorporate green infrastructure practices to recharge underground aquifers. Accordingly, GPU EIR concluded that the potential for substantial groundwater depletion because of proposed growth of the General Plan would be less than significant, and no mitigation was required.

As previously discussed, the GPU EIR determined groundwater impacts from development allowed under the General Plan to be less than significant. The Project would be consistent with this analysis because it would not result in any development in locations or at intensities beyond what was contemplated in connection with the General Plan. In addition, there is no new information of substantial importance regarding this topic that was not known when the GPU EIR was prepared. Therefore, the Project would not result in a more severe impact than was identified in the GPU EIR.

c) through g) Altering Drainage Patterns, erosion, rates of surface runoff, flooding or drainage system failure and pollutants:

Construction: As mentioned in the GPU EIR during construction, site grading, trenching, and other activities could concentrate and redirect existing runoff patterns that could lead to erosion of temporarily exposed areas of bare soil during rainfall events with subsequent sedimentation onsite or offsite. The extent of individual impacts from construction allowed under the General Plan is dependent on soil erosion potential, type of construction practice, extent of disturbed area, timing of precipitation events, topography and proximity to drainage channels. The NPDES Construction General Permit would require use of Best Management Practices (BMPs) to restrict soil erosion and sedimentation and restrict non-stormwater discharges from construction sites as well as release of hazardous materials. Therefore, the GPU EIR concluded that implementation of the General Plan and construction growth allowed under it would result in less than significant impacts, and no mitigation was required.

Operation: There are various General Plan policies that address drainage impacts. General Plan Policy NRC 10-3 requires the preservation of natural drainage courses in their state whenever feasible. General Plan Policy CSPR 5-3 requires the City to develop and maintain an environmentally sensitive drainage system for handling runoff due to seasonal rainstorms. General Plan Policy SN 3-2 requires the City to update the Storm Drain Master Plan, focusing on condition assessment and needed repairs, storm drain capacity improvements, and consistency with the Napa River-Napa Creek Flood Protection Project.

As previously discussed, the GPU EIR determined drainage impacts from development allowed under the General Plan to be less than significant. The Project would be consistent with this analysis because it would not result in any development in locations or at intensities beyond what was contemplated in connection with the General Plan. In addition, there is no new information of substantial importance regarding this topic that was not known when the GPU EIR was prepared. Therefore, the Project would not result in a more severe impact than was identified in the GPU EIR.

h) Natural hazards and release of pollutants: Due to proximity to the Napa River, much of the city is within the 100-year floodplain. Implementation of the General Plan policies will increase the emphasis on flood control related to new developments. General Plan Policy LUCD-3-2 would require the City to incorporate open spaces as part of flood-improvement projects. General Plan Policy SN 3-3 limits development in the 100-year floodplain to development which represents an acceptable use of the land in relation to the hazards involved and the costs of providing flood control facilities. General Plan Policy SN 3-4 requires all projects in floodplains, to the extent feasible, to adhere to strict design guidelines to ensure that any proposed development will withstand a flooding event and will not jeopardize the existing surrounding or downstream structures.

Additionally, General Plan Policy SN 3-5 requires the city to maintain a program to review reservoir dam safety and continue to cooperate with other jurisdictions, such as the Division of Safety of Dams, in addressing needed dam maintenance or structural improvements to mitigate risks caused by dam failure and inundation. General Plan Policy SN 3-6 requires the City to work with the State to minimize risk of damage from inundation due to failure of Rector Reservoir by maintaining the dam in a safe condition. With implementation of these policies and adherence to the regulatory requirements described above, the GPU EIR concluded that impacts related to a risk of release of pollutants due to inundation in a flood hazard, tsunami, or seiche zone as a result of development allowed under the General Plan would be less than significant, and no mitigation was required.

As previously discussed, the GPU EIR determined impacts from pollutants released under flooding events as a result of development allowed under the General Plan to be less than significant. The Project would be consistent with this analysis because it would not result in any development in locations or at intensities beyond what was contemplated in connection with the General Plan. In addition, there is no new information of substantial importance regarding this topic that was not known when the GPU EIR was prepared. Therefore, the Project would not result in a more severe impact than was identified in the GPU EIR.

i) Obstructions to water quality and sustainability plans: As described in above, construction projects would comply with the latest NPDES and other water quality requirements (i.e., Construction General Permit, Small MS4 Permit, and the General Dewatering Permit), as well as federal and State regulations, City standards, and other local ordinances. According to the GPU EIR, implementation of the General Plan will not obstruct implementation of a water quality control plan or sustainable groundwater management plan. Therefore, the GPU EIR concluded that impacts from the General Plan would be less than significant, and no mitigation was required.

As previously discussed, the GPU EIR determined impacts water quality plans as a result of development allowed under the General Plan to be less than significant. The Project would be consistent with this analysis because it would not result in any development in locations or at intensities beyond what was contemplated in connection with the General Plan. In addition, there is no new information of substantial importance regarding this topic that was not known when the GPU EIR was prepared. Therefore, the Project would not result in a more severe impact than was identified in the GPU EIR.

Conclusion

With regards to the issue area, the following findings can be made:

1. No peculiar impacts to the Project or the housing opportunity sites have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

Land Use Planning

Would the project:

Issues and Supporting Evidence	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
a) Physically divide an established community?	☐	☐	☐
b) Cause a significant environmental impact due to a conflict with any applicable land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐

Discussion

The Housing Element identifies sites designated for residential development that were previously evaluated for potential land use impacts in the GPU EIR. The Housing Element is not identifying any additional sites for residential development or changing density standards.

The Housing Element includes policies requiring amendments to the General Plan and the Zoning Code to ensure consistency between the documents. Implementation of such actions will ensure that there will not be any conflict between these governing documents. The Housing Element will not, in and of itself, physically divide a community or conflict with any land use or habitat conservation plans.

a) Dividing established communities: The General Plan's emphasis on development of key corridors as walkable mixed-use community spines will help with community cohesion and integration. Furthermore, street improvements outlined in the General Plan seek to enhance and improve connectivity to the existing road network. The General Plan also includes an extensive array of policies for new bikeways and trails, including for establishing a more cohesive and inter-connected system of trails along the Napa River, with better connections to other open space and to neighborhoods. The General Plan discourages sound walls or barriers along local streets that would prevent movement. The General Plan includes numerous policies intended to avoid dividing established communities and ensuring that new development remains interconnected.

With implementation of these policies by future development projects, the GPU EIR concluded that the General Plan would not result in the physical division of existing communities. Therefore, the GPU EIR concluded that the General Plan's impact would be less than significant, and no mitigation was required.

As previously discussed, the GPU EIR determined impacts to established communities as a result of development allowed under the General Plan to be less than significant. The Project would be consistent with this analysis because it would not result in any development in locations or at intensities beyond what was contemplated in connection with the General Plan. In addition, there is no new information of substantial importance regarding this topic that was not known when the GPU EIR was prepared. Therefore, the Project would not result in a more severe impact than was identified in the GPU EIR.

b) Policy Consistency: The city regulates land uses within the City Limits through its zoning and subdivision ordinances and, indirectly, through enforcement of the goals and policies of its General Plan that guide development. The Planning Division has the primary responsibility for administering the laws, regulations, and requirements that pertain to the physical development of the City. Specific duties relating to implementation of the General Plan will include preparing zoning and subdivision ordinance amendments, reviewing development applications, conducting investigations, and making reports and recommendations on planning and land use, zoning, subdivisions, development plans, and environmental regulations.

The City's Zoning Ordinance would be revised to implement the General Plan, as required by State Law (Government Code Section 65860[a]), and it will translate the General Plan policies into specific use regulations, development standards, and performance criteria to govern development on individual properties. The Zoning Ordinance would ultimately prescribe standards, rules, and procedures for development and the Zoning Map will provide more detail than the proposed General Plan Land Use Diagram. Accordingly, the City is the only entity with jurisdiction over the General Plan with regard to land use and the avoidance of environmental effects. At a project-specific level, individual developments under the General Plan may be subject to federal and State regulations such as those that protect waters of the United States, special-status species, and water quality. See Biological Resources, and Hydrology and Water Quality, for a discussion of these requirements.

The General Plan is also consistent with other regional plans as well as other local plans. The General Plan seeks to maintain consistency with the policies of the Napa County General Plan and Napa County Code of Ordinances adopted for the purpose of avoiding or mitigating an environmental effect within unincorporated areas of the Planning Area outside City limits, particularly regarding the conservation of open space and agricultural land. Development under the General Plan would also be subject to the City of Napa Hillside Overlay District requirements (Policy NRC 3-1) with the goal to prevent cut-and-fill and other destructive developmental practices.

The General Plan would not conflict with any existing specific plans in Napa or regulations that protect the environment. Additionally, the proposed Safety and Noise, and Natural Resources Conservation

elements of the General Plan include numerous policies that protect the environment. These General Plan policies aim to preserve and enhance wildlife habitats; support the preservation of rare, endangered, and threatened species; develop a balanced open space network; and support efforts for preserving open spaces around the City.

With implementation of these policies in future development projects, the General Plan does not conflict with other agencies' applicable land use plans, policies, or regulations intended to protect the environment. Therefore, the GPU EIR concluded that the General Plan's impact would be less than significant, and no mitigation was necessary.

As previously discussed, the GPU EIR determined impacts to land use plans as a result of development allowed under the General Plan to be less than significant. The Project would be consistent with this analysis because it would not result in any development in locations or at intensities beyond what was contemplated in connection with the General Plan. In addition, there is no new information of substantial importance regarding this topic that was not known when the GPU EIR was prepared. Therefore, the Project would not result in a more severe impact than was identified in the GPU EIR.

Conclusion

With regards to the issue area, the following findings can be made:

1. No peculiar impacts to the Project or the housing opportunity sites have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

Mineral Resources (Topic not included in GPU EIR)

Would the project:

Issues and Supporting Evidence	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐

Discussion

The State of California, under the Surface Mining and Reclamation Act (SMARA), can designate certain areas as having mineral deposits of regional significance. There are no known Mineral Resources in the Planning Area; thus, this topic was excluded from the GPU EIR. Likewise, because there are no known Mineral Resources within the City, any development that occurs consistent with the Housing Element would have no impact on Mineral Resources, and no further analysis is required.

Noise

Would the project result in:

Issues and Supporting Evidence	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance or of applicable standards of other agencies?	☐	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan area or, where such a plan has not been adopted, within two miles of a public airport or a public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐

Discussion

The General Plan Safety and Noise Element establishes land use compatibility criteria for both transportation noise sources such as roadways, and for non-transportation (stationary) noise sources. Policies and implementation programs in the General Plan Section 8.5 protect Napa residents from excessive noise levels. Noise impacts were also analyzed in the GPU EIR.

The Housing Element identifies sites designated for residential development that were previously evaluated for potential noise impacts in the GPU EIR, which includes policies to reduce impacts to noise-sensitive land uses from construction, traffic, and industrial uses by separating incompatible uses and creating noise barriers.

The Housing Element will not, in and of itself, create noise impacts. Through the use of standard noise mitigation measures, which would remain applicable to future development proposals that are consistent with the Housing Element, the city has been able to mitigate any identified noise impacts for previously considered projects. At such time that a development proposal is considered, that project will be subject to adopted development guidelines/standards.

a) Substantial temporary or permanent increase in ambient noise levels

Construction Noise: The General Plan will result in construction activities that could generate temporary noise. The General Plan does not propose any specific development projects but outlines what future development is expected to look like in Napa; future development under the General Plan would be required to comply with the noise control regulations specified in Section 8.08.025 (Noise—Construction Activity) of the City's Municipal Code. As noted in Regulatory Setting of the GPU EIR, the Municipal Code requires that construction activity adhere to several limitations, including requiring muffler systems that are properly maintained and locating equipment adjacent to developed areas only if acoustical shielding is used.

The General Plan supports a series of disparate construction activities associated with new development and redevelopment in the City, which would require heavy-duty machinery and equipment. Construction activities would be temporary and related noise impacts would be short-term. Construction activities have the potential to substantially increase ambient noise levels at noise-sensitive locations and result in excess noise in the vicinity of sensitive receptors that could exceed noise standards set forth in the General Plan.

To protect future and existing sensitive land uses from substantial temporary noise increases during construction activities, policies in the General Plan serve to minimize impacts. General Plan Policy SN 4-7 includes a requirement for future development to implement noise control measures, standards, and monitoring procedures to reduce impacts on nearby uses. General Plan Policy SN 4-8 requires measures to reduce noise impacts for construction activity that is within 1,000 feet of noise-sensitive uses.

The potential for construction-related noise effects would depend on the proximity of construction activities to sensitive receptors, the presence of intervening barriers, the number and types of equipment used, and the duration of the activity, features that cannot be identified with accuracy in a program-level analysis. Compliance with the time-of-day restrictions and noise muffling requirements for construction activity in the City's noise ordinance, as well as the noise-reducing policies included in the General Plan, will reduce impacts on sensitive receptors. Measures to reduce noise may include using enclosures around noise-generating equipment, locating equipment as far away from adjacent land uses as possible, and requiring a procedure for tracking and responding to noise complaints received from affected sensitive receptors. Because measures to reduce noise will be implemented in accordance with General Plan policies, the GPU EIR concluded that the increases in noise from construction activities would not be considered substantial. Therefore, the GPU EIR concluded that the General Plan's impact would be less than significant.

Traffic Noise: Future development occurring as part of the General Plan will result in changes to the land use development patterns in Napa. Consequently, the General Plan will change traffic volumes and the associated traffic noise in the city relative to existing conditions.

The General Plan will result in traffic noise increases at many of the roadway segments, but the General Plan's contributions will generally be below the increase in noise considered to be noticeable to the human ear (i.e., 3 dB). According to the GPU EIR future development allowed by the General Plan may not result in noticeable changes in traffic noise levels relative to 2040 buildout conditions. No

substantial permanent increase in the ambient noise level would occur from vehicle traffic as a result of development allowed under the General Plan.

According to the GPU EIR, development under the General Plan will not cause noticeable increases in traffic noise at any roadway segment relative to 2040 conditions without additional development contemplated in the General Plan. Although four segments may experience noticeable noise increases relative to existing conditions, these increases would have occurred in 2040 with or without the General Plan. For these reasons, the GPU EIR concluded that there would be no substantial permanent increase in traffic noise, and the impact was considered to be less than significant.

Train Noise: As discussed in Existing Noise Sources, railroad activity in the City is limited to one excursion rail line, the Napa Valley Wine Train, and no freight lines. The Napa Valley Wine Train operates on an 18-mile segment of track from downtown Napa north to St. Helena. There are typically two separate trains that traverse the rail line per day, and each train makes a round trip between downtown Napa and St. Helena. Approximately 4 miles of the rail line are located within the City, though the tracks extend south of the McKinstry Street Station in downtown Napa and through the southern boundary of the City; however, this section of track is not used as frequently but could be activated at any time. For land uses in the City near the railroad tracks, noise from the train horn and bell, and crossing gates are part of the ambient noise environment.

The General Plan was not expected to directly result in an increase of train operations in the city. However, new development that could occur with the General Plan could result in land uses being exposed to train noise that exceeds applicable land use compatibility standards. The Napa Valley Wine Train can result in an Ldn level of 59 dBA in residential areas in Napa, which is close to the upper limit of what is normally acceptable for most residential uses (County of Napa 2007a). The California Supreme Court concluded in the California Building Industry Association vs. Bay Area Air Quality Management District (CBIA v. BAAQMD) decision that “CEQA generally does not require an analysis of how existing environmental conditions will impact a project’s future users or residents.” Because noise from trains is an existing condition in the City, and the General Plan will not increase train operations, this impact is not significant under CEQA.

Stationary Source Noise: Development under the General Plan will have the potential to result in increased noise levels from the development of new stationary noise sources, which could occur near sensitive land uses. Additionally, the development of new residences close to existing noise-generating land uses could also cause exposure to noise that exceeds the City’s existing noise standards. Stationary sources of noise could include sources such as car washes, recycling yards, and heating, ventilation, and air conditioning equipment. Because the GPU EIR is a program-level analysis, it is not possible to determine the extent that noise sensitive land uses will be exposed to noise from equipment without speculation, because the specific layout and type of equipment are not known.

The General Plan includes a policy that will help reduce potential noise effects from stationary sources. General Plan Policy SN 4-4 includes the goal for new development not to generate noise in excess of the performance standards in the General Plan. This guiding principle for new development will reduce operational sources of noise that may affect existing noise-sensitive land uses, because new development will be designed with the performance standards in mind. Because the goal of Policy SN 4-4 is for new development not to cause existing development to exceed the performance standards

from the General Plan, development that meets this goal will not cause a permanent increase in ambient noise levels in excess of standards in the previous General Plan.

For new development that are built in accordance with the General Plan, Policy SN 4-2 will apply, which has the goal of new projects being designed with mitigation to meet the allowable outdoor and indoor allowable noise exposure standards from Table 8-6 of the General Plan.

This policy will lead to noise-sensitive land uses being less affected by stationary source noise levels that arise from future development. Additionally, Section 17.52.310.D.2 of the City's Municipal Code requires that new nonresidential projects built out as part of the General Plan that may increase ambient noise levels by 5 dB CNEL or more or in excess of 60 dB CNEL shall prepare a noise analysis as part of the project's CEQA review. The noise analysis will identify anticipated noise levels and recommend noise attenuation measures to maintain ambient levels and to keep levels below 60 dB CNEL. Additionally, Section 17.52.310.D.3 requires that nonresidential projects adjacent to residential districts must locate or design potential noise generation areas (e.g., truck parking, loading docks, garbage collection area) to minimize impacts on adjacent noise-sensitive uses to the extent feasible.

These components of the Municipal Code will minimize the effects of stationary source noise from new nonresidential development projects on existing land uses such that there will not be a substantial permanent increase and the impact is considered to be less than significant in the GPU EIR.

As previously discussed, the GPU EIR determined impacts to ambient noise as a result of development allowed under the General Plan to be less than significant. The Project would be consistent with this analysis because it would not result in any development in locations or at intensities beyond what was contemplated in connection with the General Plan. In addition, there is no new information of substantial importance regarding this topic that was not known when the GPU EIR was prepared. Therefore, the Project would not result in a more severe impact than was identified in the GPU EIR.

b) Groundborne vibration

Construction: To protect future and existing sensitive land uses from excessive groundborne vibration during construction activities, policies in the General Plan serve to minimize impacts. General Plan Policy SN 4-7 includes a requirement for future development to implement vibration control measures, standards, and monitoring procedures to reduce impacts on nearby uses. General Plan Policy SN 4-8 requires measures to prevent exposure of vibration-sensitive receptors to substantial groundborne vibration levels, for receptors within 100 feet of pile-driving locations and 25 feet of non-impact equipment.

As such, future developments will be required to sufficiently reduce vibration through a combination of measures to prevent adversely affecting nearby vibration-sensitive land uses. For these reasons, the increases in vibration from construction activities will not be considered substantial. Therefore, this impact is considered to be less than significant in the GPU EIR.

Traffic Vibration: According to the GPU EIR, a specific set of circumstances are required for traffic vibration to be noticeable (i.e., severe roadway discontinuities and high truck volumes) and the

duration of the impact that would result under these circumstances (i.e., a fraction of a second), it is unlikely that traffic vibration would be perceived by any persons within land use designations. A detailed analysis of vibration generated by operational traffic is not provided, because it would be too speculative to accurately identify any impacts. However, for the reasons discussed in this section, perceptible groundborne vibration from vehicle traffic is not likely to be a common occurrence; therefore, the impact is less than significant in the GPU EIR.

Train Vibrations: According to the GPU EIR, the Napa Valley Wine Train is a low-speed leisure train and thus travels at speeds well below 50 mph through Napa. Because vibration from passing trains is an existing condition in the City, and the General Plan does not increase train operations, this impact is considered less than significant in the GPU EIR.

The GPU EIR determined impacts of groundborne vibration as a result of development allowed under the General Plan to be less than significant. The Project would be consistent with this analysis because it would not result in any development in locations or at intensities beyond what was contemplated in connection with the General Plan. In addition, there is no new information of substantial importance regarding this topic that was not known when the GPU EIR was prepared. Therefore, the Project would not result in a more severe impact than was identified in the GPU EIR.

c) Airport / Airstrip noise: According the GPU EIR, the Napa County Airport Master Plan, prepared in 2007, depicts noise levels in the area around the airport. As a result of this plan, noise was modeled and visually depicted in contour maps. Based on these airport contour maps the Planning Area is not substantially affected by the modeled airport noise contours. Additionally, no other public or private airfields are within 2 miles of the City. The General Plan will not worsen the levels of noise that residents and employees within the city would be exposed to. The impact is considered to be less than significant in the GPU EIR.

The GPU EIR determined the impacts of airport noise as a result of development allowed under the General Plan to be less than significant. The Project would be consistent with this analysis because it would not result in any development in locations or at intensities beyond what was contemplated in connection with the General Plan. In addition, there is no new information of substantial importance regarding this topic that was not known when the GPU EIR was prepared. Therefore, the Project would not result in a more severe impact than was identified in the GPU EIR.

Conclusion

With regards to the issue area, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

Population and Housing

Would the project:

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information	Substantial New Information
a) Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	☐	☐	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐

Discussion

As previously identified, the 6th Cycle Housing Element Update is a policy document that would not directly result in the construction, modification, or improvement of residential development in the City. The Housing Element identifies sites designated for residential development that were previously evaluated for potential impacts to population and housing in the 2040 GPU EIR. The Housing Element is not identifying any additional sites for residential development or changing density standards.

The Housing Element also provides various housing programs to promote housing for all household income levels. As a result, this project will not displace any existing residents, as it facilitates adequate housing for City residents. The Housing Element sets forth programs and policies to facilitate housing conservation, maintenance, and diversity, and no aspect of the project involves the displacement of people.

a) Population Growth: Under the 2040 General Plan, the City's population is expected to grow to 97,200 by 2040, an increase of 23 percent over current levels. This increase in population will be accompanied by an increase in employment opportunities, providing an additional 10,800 jobs by 2040. Between 2020 and 2040, the city is projected to maintain its current share of the Napa County population of 54 percent. New homes and business developed in the Planning Area as a result of the General Plan will accommodate growth in Napa that is commensurate with the City's size, growth rate, and place in the region.

As a programmatic land use plan, the General Plan and its policies are designed to accommodate future growth. That is, the plan itself does not propose development of new housing; rather, it guides future development in response to anticipated population growth. The City's 2023 to 2031 regional housing

needs allocation (RHNA) obligations for the 6th Cycle Housing Element total 2,669 housing units. In extrapolating the RHNA requirement, which is over an eight-year period, to the General Plan's 2040 horizon, this would result in about 5,650 new units; although, the General Plan predicts a total of 7,800 new units by 2040. Recognizing that market trends are difficult to predict and that growth is not a linear process, the General Plan is expected to accommodate the city's growth needs while ensuring adequate housing availability to support anticipated job growth.

Additionally, the General Plan seeks to achieve a greater balance in the jobs/employed residents ratio to improve affordability and reduce residents' vehicle miles traveled by allowing more opportunities to locate employed residents and their jobs within the city. The existing jobs/employed residents ratio is 1.19, indicating that more jobs exist within the city than do employed residents, resulting in more employees commuting from outside the city. An increase of 7,800 housing units would lower the jobs/employed residents ratio slightly to 1.17. The General Plan anticipates all growth within Napa's existing Rural Urban Limit. New residential opportunities are a result of targeted residential density increases in mixed-use designations within Focus Areas, along corridors, and in downtown to provide higher density housing near jobs and community-serving retail and services. This type of infill development is designed to focus on redevelopment and revitalization of areas already served by infrastructure and would not require extensions of roads or other infrastructure. Although some road extensions and improvements are anticipated, this work is largely to improve connectivity within the existing city structure and would not result in unplanned growth. Areas outside the Focus Areas that are planned for growth (e.g., the Napa Pipe Project) would include the necessary street and infrastructure improvements to accommodate planned growth. Thus, no new road extensions, improvements, or infrastructure would indirectly result in substantial unplanned population growth.

The General Plan anticipates and plans for future growth, and, accordingly, policies in the General Plan ensure that infrastructure, facilities, and utilities would be appropriately sized for future growth. As stated by the GPU EIR, development under the General Plan would not induce substantial unplanned population growth, either directly or indirectly, and this impact is considered less than significant with no mitigation required.

As mentioned in the summary above, the GPU EIR determined the impacts related to population growth as a result of development allowed under the General Plan to be less than significant. The Project would be consistent with this analysis because it would not result in any development in locations or at intensities beyond what was contemplated in connection with the General Plan. In addition, there is no new information of substantial importance regarding this topic that was not known when the GPU EIR was prepared. Therefore, the Project would not result in a more severe impact than was identified in the GPU EIR.

b) Displacement: A substantial portion (about 50 percent) of developed land in the Planning Area consists of residential uses, which are not anticipated to undergo significant land use changes under the General Plan since it concentrates new high-density and mixed-use development in downtown,

in Focus Areas located along major corridors, and in opportunity sites in different parts of the city. The General Plan focuses on providing infill development housing opportunities while seeking to preserve existing housing and neighborhoods. Adopted land use classifications introduce greater flexibility of uses and allow a higher intensity of residential uses in more areas of the city. As such, the General Plan is projected to increase the overall number of housing units and provide additional housing opportunities to serve the diverse needs of the community at various socioeconomic levels at locations and development intensities that are consistent with the General Plan. The General Plan does not propose specific development that would result in the displacement of existing housing units or people, necessitating the construction of replacement housing elsewhere. Moreover, future construction that is consistent with the Housing Element would likewise be consistent with the General Plan, and no additional displacement impacts would result from the Project as compared with the General Plan. Additionally, there are multiple policies to prevent displacement within various elements of the General Plan, including the Housing Element. Therefore, any displacement impact on existing housing units or people from the General Plan is considered to be less than significant with no mitigation required in the GPU EIR.

The GPU EIR determined displacement impacts from development allowed under the General Plan to be less than significant. The Project would be consistent with this analysis because it would not result in any development in locations or at intensities beyond what was contemplated in connection with the General Plan. In addition, there is no new information of substantial importance regarding this topic that was not known when the GPU EIR was prepared. Therefore, the Project would not result in a more severe impact than was identified in the GPU EIR.

Conclusion

With regards to the issue area, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

Public Services

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to

maintain acceptable service ratios, response times or other performance objectives for any of the following public services:

Issues and Supporting Evidence	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
a) Fire protection?	☐	☐	☐
b) Police protection?	☐	☐	☐
c) Schools?	☐	☐	☐
d) Parks?	☐	☐	☐
e) Other public facilities?	☐	☐	☐

Discussion

As previously identified, the 6th Cycle Housing Element Update is a policy document that would not directly result in the construction, modification, or improvement of residential development in the City. The Housing Element identifies sites designated for residential development that were previously evaluated for potential impacts to public services in the 2040 GPU EIR. The Housing Element is not identifying any additional sites for residential development or changing density standards.

The Housing Element will not, in and of itself, impact the provision of public services, including fire and police protection, schools, parks, or other public facilities for those land use designations, and any future development that occurs consistent with the Housing Element would also be consistent with the General Plan. Any future proposals will be required to pay impact fees that have been established to reduce the potential impact of public services and to meet fire-flow requirements and provide adequate rights-of-way for fire and police vehicles. At such time that a development proposal is considered, that project will be subject to adopted development guidelines/standards.

a) Fire Protection: Buildout under the General Plan is projected to increase the population of the City of Napa by approximately 23 percent over current levels, resulting in a 2040 population of 97,200. Consequently, it is a reasonable expectation that population and housing within the Planning Area would increase demand on fire protection and emergency services. To maintain or achieve acceptable staffing and response-time objectives for fire protection, it is reasonably foreseeable that new or expanded fire stations would be needed. Construction and operation of these facilities would have the potential to result in adverse environmental impacts.

Under the City's Municipal Code, housing developers pay a fire and paramedic development impact fee for the purpose of financing new facilities and/or enhanced staffing and equipment associated with increased service demands. Currently the Napa Fire Department response times are NFPA 1710 compliant which is a result of appropriate station distribution and unit deployment. The 2040 population projected is expected to reduce response times, may require staffing and equipment increases, and may require the construction or relocation of fire stations. However, these improvements would be developed in association with future development projects and would not be directly authorized under the General Plan. Consequently, the potential environmental impacts of these future developments and expansions were not evaluated in the GPU EIR.

Construction of fire stations seldom results in significant effects requiring preparation of an EIR, because any potential environmental impacts can usually be mitigated to a less-than-significant level. Mitigation, if necessary, would be site- and project-specific. Because site- and project-specific information is not available for future fire stations, mitigation measures were not developed for the GPU EIR. Mitigation measures for impacts of the General Plan are presented in the relevant resource sections of the GPU EIR. These measures would ensure that impacts of construction and operation of new fire stations would be less than significant. Further, General Plan goals and policies will ensure adequate levels of service and funding for fire protection services as development occurs, including policies related to the planning and building of public facilities to support growth and ensure public safety with adequate staffing, equipment, and other resources in response to specific developments and City growth in general. Accordingly, this impact from the General Plan is considered to be less than significant, and no mitigation is required in the GPU EIR.

The GPU EIR determined fire protection impacts from development allowed under the General Plan to be less than significant. The Project would be consistent with this analysis because it would not result in any development in locations or at intensities beyond what was contemplated in connection with the General Plan. In addition, there is no new information of substantial importance regarding this topic that was not known when the GPU EIR was prepared. Therefore, the Project would not result in a more severe impact than was identified in the GPU EIR.

b) Police Protection: Buildout under the General Plan is projected to increase the population of the City of Napa by approximately 23 percent over current levels, resulting in a 2040 population of 97,200. Consequently, it is a reasonable expectation that population and housing within the Planning Area would increase demand on police protection services, decreasing current service level ratios.

NPD is currently staffed with 9.5 sworn personnel per 10,000, below the 16.6 sworn personnel per 10,000 national average. The 2040 population projected by the General Plan would further reduce this ratio, likely resulting in reduction to response times, necessitating an increase in staffing and the expansion of future police facilities or the construction of new facilities. The number, locations, physical sizes, equipment assignments, and designs of future police facilities, as well as the expansion of existing facilities are unknown. Consequently, the potential environmental impacts of increased facilities or stations were not evaluated in the GPU EIR. Construction and operation of police stations does not typically result in significant effects requiring preparation of an EIR, because any potential

construction impacts can usually be mitigated to less-than-significant levels, and potential operational impacts can usually be avoided by project design and operating protocols. Mitigation, if necessary, would be site- and project-specific. Because site- and project-specific information is not available for future police stations, mitigation measures were not developed for the GPU EIR.

Mitigation measures for impacts of implementation of the General Plan are presented in the relevant resource sections in the GPU EIR. These measures would ensure that impacts of construction or expansion of future police facilities would be less than significant. In addition, the current General Plan sets forth goals and policies to ensure adequate levels of services and funding for police protection services as development occurs, including policies related to the planning and building of public facilities to meet adopted service levels and ensure public safety and sufficient staffing. The General Plan also includes policies that focus on community-oriented education and involvement programs. General Plan policies would continue to support adequate infrastructure, services, and facilities relevant to police protection services. Accordingly, the GPU EIR concluded that the General Plan's impact would be less than significant, and no mitigation is required in the GPU EIR.

The GPU EIR determined impacts to police protection from development allowed under the General Plan to be less than significant. The Project would be consistent with this analysis because it would not result in any development in locations or at intensities beyond what was contemplated in connection with the General Plan. In addition, there is no new information of substantial importance regarding this topic that was not known when the GPU EIR was prepared. Therefore, the Project would not result in a more severe impact than was identified in the GPU EIR.

c) Schools:

Growth resulting from the General Plan is expected to increase the population of the City of Napa by approximately 17,900 residents by 2040, for a total population of 97,200, which would be expected to yield a projected student population of approximately 11,920 total students in the Planning Area (1.4% more than the 2020 total enrollment). While NVUSD capacity currently exceeds enrollment, the projected 2040 student population would significantly exceed current capacity, putting pressure on NVUSD to create new or expanded facilities. The General Plan sets forth goals and policies to cooperate with NVUSD in its mission to provide for the educational needs of Napa residents, including monitoring housing, population, and enrollment trends and continued support of schools and education. Goals and policies support working with NVUSD to plan for future school facility needs, the co-location of City and other public facilities (i.e., schools and libraries), and supporting efforts for high-quality and affordable preschool.

NVUSD collects fees levied on developers for residential and commercial development. Future development under the General Plan would be subject to developer fees, which are deemed by law to fully mitigate impacts of new development on school districts. The types, number, locations, physical sizes, and designs of future public schools, as well as the expansion of existing schools to accommodate future growth are unknown. Consequently, the potential environmental impacts of future schools and school expansions were not evaluated in the GPU EIR. Construction of schools often

result in significant effects that require preparation of an EIR, depending on the size and location. Future new or expanded public schools would be subject to CEQA analysis by the school district. Potential impacts would be disclosed, and site- and project-specific mitigation measures, if necessary, would be developed during the CEQA review process. Because new schools often require an EIR, implying the potential for significant impacts, this impact is foreseeably significant. However, because public school approval is outside the authority of the City, construction of public schools is not a component of the General Plan. Accordingly, for growth allowed under the General Plan, the GPU EIR concluded that the impact would be less than significant, and no mitigation is required in the GPU EIR.

The GPU EIR determined impacts to schools from development allowed under the General Plan to be less than significant. The Project would be consistent with this analysis because it would not result in any development in locations or at intensities beyond what was contemplated in connection with the General Plan. In addition, there is no new information of substantial importance regarding this topic that was not known when the GPU EIR was prepared. Therefore, the Project would not result in a more severe impact than was identified in the GPU EIR.

d) Parks: The City of Napa currently exceeds the existing General Plan service standard ratio of parkland-to-residents. With projected population growth under the General Plan, the construction of housing would increase the demand for parks in the City. However, even with population growth, the parkland provided would still be above the adopted service standard of 10 acres per 1,000 residents. Accordingly, the GPU EIR concluded that this impact would be less than significant, and no mitigation is required in the GPU EIR.

The GPU EIR determined impacts to parks from development allowed under the General Plan to be less than significant. The Project would be consistent with this analysis because it would not result in any development in locations or at intensities beyond what was contemplated in connection with the General Plan. In addition, there is no new information of substantial importance regarding this topic that was not known when the GPU EIR was prepared. Therefore, the Project would not result in a more severe impact than was identified in the GPU EIR.

e) Other Facilities:

The Napa County Library system currently serves a population of approximately 131,643, providing approximately 0.24 square foot per capita, below the APA minimum suggested size. The library also currently lacks services in the north part of the City. Population growth under the General Plan would be expected to further strain library services and further diminishing the ratio pertaining to square footage per service population. To achieve acceptable ratios pertaining to square footage per capita, it is reasonably foreseeable that the provision of new or physically altered library facilities could be required, with the potential to result in adverse environmental impacts. The number, locations, and designs of future libraries and library expansions are unknown. Consequently, the potential environmental impacts of future libraries, if any, were not evaluated in the GPU EIR.

Typical library impacts include a reduction in the parking supply on adjoining streets if off-street parking is insufficient. Mitigation, if necessary, would be site- and project-specific. Because site- and project-specific information is not available about future libraries, mitigation measures were not developed in the GPU EIR. Future new or expanded public libraries would be subject to CEQA analysis. Potential impacts would be disclosed, and site- and project-specific mitigation measures, if necessary, would be developed during the CEQA review process. Such impacts can generally be mitigated to a less-than-significant level. Mitigation measures for impacts of implementation of the General Plan are presented in the relevant resource sections of the GPU EIR. These measures would ensure that impacts of construction or expansion of future library facilities under the General Plan would be less than significant.

The GPU EIR determined impacts to city facilities from development allowed under the General Plan to be less than significant. The Project would be consistent with this analysis because it would not result in any development in locations or at intensities beyond what was contemplated in connection with the General Plan. In addition, there is no new information of substantial importance regarding this topic that was not known when the GPU EIR was prepared. Therefore, the Project would not result in a more severe impact than was identified in the GPU EIR.

Conclusion

With regards to the issue area, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

Recreation

Would the project:

Issues and Supporting Evidence	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐
b) Include recreational facilities, or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	☐	☐	☐

Discussion

As previously identified, the 6th Cycle Housing Element Update is a policy document that would not directly result in the construction, modification, or improvement of residential development in the City. The Housing Element identifies sites designated for residential development that were previously evaluated for potential recreation impacts in the 2040 GPU EIR. The Housing Element is not identifying any additional sites for residential development or changing density standards.

Implementation of the proposed Housing Element will not, in and of itself, impact any existing recreational facilities, and any future development that occurs consistent with the Housing Element would also be consistent with the General Plan. It will not increase the use of existing recreational facilities or require the construction or expansion of recreational facilities. Potential impacts to existing recreational facilities are location-specific and cannot be assessed in a meaningful way until the location of a project site is known. At such time that a development proposal is considered, that project will be subject to adopted development guidelines/standards.

a) Existing Parks: Implementation of the General Plan is expected to result in a buildout population of 97,200 by 2040, which is an increase of approximately 22.7 percent from the population in 2020. Additional population would be expected to place added physical demands on existing park facilities by increasing the number of people using the parks, lengthening the periods of time during which the parks would be in active use, and/or increasing the intensity of use over the course of a typical day. Without proper maintenance, important park features such as vegetation, water resources, built

structures, paths, sport facilities, and others would face increased wear over the planning period, and their useful lives could be shortened.

The General Plan sets parkland standards that seek to provide all residents with access to both large and small parks by locating these recreation opportunities within 0.25- to 0.5-mile distance from residential areas. Napa currently exceeds its parkland provision standards of 10 acres per 1,000 residents, offering approximately 13.6 acres of parkland per 1,000 residents. To meet the needs of its estimated buildout population such that existing facilities are not subject to physical deterioration, in 2040 the City should provide 972 acres of additional parkland. The City would be able to meet these projected needs with its current inventory of existing parks and joint use facilities, resulting in a future overall park service ratio of 11.2 acres per 1,000 residents. Planned parks and trail connections at Napa Pipe and other future private development projects would further increase future parkland ratios. Given this analysis, the City has determined that existing residents are, and projected future residents would continue to be, well-served by existing parks and joint use facilities. General Plan policies prioritize improvements and maintenance of existing parks and also incorporate flexibility to respond to changing demographics and user needs, ensuring that park and facility improvements are reflective of the needs and desires of Napa's diverse community through 2040. In addition, policies promote the protection and enhancement of natural resources located on parklands to ensure they receive the necessary attention to prevent degradation.

Given that the park acreage is sufficient to meet future demand, and that the General Plan directs the City to focus capital projects on sustaining and improving existing parks and includes policies and standards that ensure residents are within close access to parks. According the GPU EIR the development allowed under the General Plan would not increase the use of existing recreational facilities such that it would result in the substantial deterioration or the acceleration of the deterioration of existing parks and recreational facilities. The GPU EIR concluded that impact would be less than significant, and no mitigation would be necessary.

The GPU EIR determined impacts to recreation from development allowed under the General Plan to be less than significant. The Project would be consistent with this analysis because it would not result in any development in locations or at intensities beyond what was contemplated in connection with the General Plan. In addition, there is no new information of substantial importance regarding this topic that was not known when the GPU EIR was prepared. Therefore, the Project would not result in a more severe impact than was identified in the GPU EIR.

b) Expansion of Recreation: The City currently exceeds its park service standards and is projected to continue to meet these standards under buildout of the General Plan. Therefore, the General Plan would not result in a need for the construction of new parks or recreational facilities. Nevertheless, construction of any future parks has the potential to negatively affect the environment.

Multiple General Plan policies maintain existing publicly owned parks and land designated as open space and promote coordination with regional partners to preserve and protect existing open spaces in the Planning Area, respectively. As such, urban development is not anticipated in these areas, and

the General Plan is expected to result in very minimal loss of natural habitat or impacts on natural resources on public lands. General Plan policies also prioritize maintenance and enhancement of existing parkland and recreational facilities over the development of new parks; these policies would help to ensure that existing parks would function at their highest capacity and would not require expansion or replacement over the course of the planning horizon. Other policies protect natural resources and sensitive habitats in open space areas and continue the City's partnership with NVUSD to offer joint use of school facilities, prioritizing efficient use of existing amenities and facilities over the development of new parks or recreational facilities.

General Plan policies also promote the incorporation and expansion of recreational open space into major infrastructure projects. The inclusion of low-impact development and green infrastructure strategies for new projects will help mitigate environmental impacts associated with the construction of these facilities. Additionally, this type of future project fulfills the guiding principle to foster connections to nature and open space and, by design, would prioritize the preservation of existing open space and ecological corridors; provide cleaner air, water, and soil than traditional gray infrastructure projects; and efficiently add recreational facilities such as trails and open space that further increase parkland ratios. The General Plan also encourages the City to identify and develop new paths, trails, and greenways as new development takes place, to connect and fill in gaps in the city's open space network.

Given that population growth under the General Plan would result in a service ratio that meets the City's park service standards (thereby limiting the extent to which new recreational facilities would be constructed or existing facilities expanded) and because the proposed policies detailed above—as well as laws and codes and programs discussed elsewhere in the GPU EIR—would protect sensitive resources and habitats, growth under the General Plan would not result in a significant impact from construction or expansion of recreational facilities, and no mitigation would be necessary.

The GPU EIR determined impacts recreation expansion allowed under the General Plan to be less than significant. The Project would be consistent with this analysis because it would not result in any development in locations or at intensities beyond what was contemplated in connection with the General Plan. In addition, there is no new information of substantial importance regarding this topic that was not known when the GPU EIR was prepared. Therefore, the Project would not result in a more severe impact than was identified in the GPU EIR.

Conclusion

With regards to the issue area, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

Transportation/Traffic

Would the project:

Issues and Supporting Evidence	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☐
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3(b) (criteria for analyzing transportation impacts – vehicle miles traveled)?	☐	☐	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐
d) Result in inadequate emergency access?	☐	☐	☐

Discussion

As previously identified, the 6th Cycle Housing Element Update is a policy document that would not directly result in the construction, modification, or improvement of residential development in the City. The Housing Element identifies sites designated for residential development that were previously evaluated for potential transportation and traffic impacts in the 2040 GPU EIR. The Housing Element is not identifying any additional sites for residential development or changing density standards. All developments must comply with the General Plan, which incorporates policies and implementation programs for minimizing future circulation impacts. The Housing Element will not, in and of itself, impact the circulation system, congestion management, air traffic, the safety of design features, and policies, plans, and programs related to transportation, and any future development that occurs consistent with the Housing Element would also be consistent with the General Plan.

Potential impacts to transportation and traffic are location-specific and cannot be assessed in a meaningful way until the location of a project site is known, and other impacts are measured on the basis of the specific intensity of development at a given location. At such time that a development proposal is considered, that project will be subject to adopted development guidelines/standards.

a) Program/Plan/Policy Consistency: MTC and the ABAG provide transportation planning and funding for the region, and have adopted the Plan Bay Area 2020 Final Plan to provide the platform for identifying and funding transportation needs for the next 20 years. The General Plan incorporates strategies from and is consistent with the Plan Bay Area 2020 Final Plan. The Transportation Element of the General Plan focuses on enhancing transportation options for Napa residents, workers, and visitors and improving mobility through increased connectivity and efficient management of existing infrastructure. The Transportation Element looks at improving transportation options and connectivity within the City, as well as furthering the goals of the Napa Vision and Guiding Principles, including environmental sustainability. In addition, the Land Use and Transportation Elements of the General Plan have been designed to complement one another to create compact and mixed-use development areas that support walking, bicycling, and transit service.

The General Plan includes new bicycle connections within the Planning Area, supporting the General Plan policies that promote multimodal transportation and provide a biking infrastructure. The General Plan also supports and expands upon the improvements identified in the City of Napa Bicycle Plan as well as the Napa Countywide Bicycle Plan. The General Plan includes policies to improve traffic signalization, implement traffic signal management, and coordination techniques to improve traffic flow. Intersection improvement projects would add signalization, improve traffic flow, and allow for safer conditions for pedestrians and bicyclists. In addition, the General Plan includes a capacity expansion project to widen a corridor in order to provide turn lane improvements.

The City has adopted VMT baselines from the existing average levels for Napa County with thresholds of significance 15 percent below the baselines. For the GPU EIR, the City's traffic consultants calculated the VMT efficiency metrics for the No Project and With Project scenarios. As discussed in the GPU EIR, VMT per capita for the City under the General Plan No Project conditions is 11.3, but under the With Project conditions, VMT per capita decreases to 9.03 in the City. As such, implementation of the General Plan would decrease VMT per capita from No Project conditions to With Project conditions. In addition, VMT per capita under the With Project conditions would be 15 percent below the baseline. Therefore, the GPU EIR concluded that transportation impacts regarding consistency with program, plans, and policies would be less than significant.

The GPU EIR determined VMT impacts from development allowed under the General Plan to be less than significant. The Project would be consistent with this analysis because it would not result in any development in locations or at intensities beyond what was contemplated in connection with the General Plan. In addition, there is no new information of substantial importance regarding this topic that was not known when the GPU EIR was prepared. Therefore, the Project would not result in a more severe impact than was identified in the GPU EIR.

b) Vehicle Miles Travelled (VMT): With the newly adopted CEQA guidelines, transportation impacts are to be evaluated based on a project's effect on VMT. As such, the General Plan Transportation Element departs from considering LOS as the only measure of a transportation system's effectiveness and utilizes the City's adopted significance thresholds for VMT. As identified in the GPU EIR, VMT per capita for the City under the No Project conditions is 11.3. Under the With Project conditions VMT per

capita decreases to 9.03. As such, implementation of the General Plan would decrease VMT per capita from No Project conditions to With Project conditions. In addition, VMT per capita under the With Project conditions would be 15 percent below the baseline. Therefore, impacts in the GPU EIR were considered to be less than significant.

The GPU EIR determined VMT impacts from development allowed under the General Plan to be less than significant. The Project would be consistent with this analysis because it would not result in any development in locations or at intensities beyond what was contemplated in connection with the General Plan. In addition, there is no new information of substantial importance regarding this topic that was not known when the GPU EIR was prepared. Therefore, the Project would not result in a more severe impact than was identified in the GPU EIR.

c) Hazards: The GPU EIR concluded that implementation of the General Plan would increase traffic levels in the Planning Area and introduce new intersections and traffic signals to the existing street system. However, these new roadways and traffic signals would be designed to City Design standards and, therefore, should not substantially increase hazards due to a design feature. Therefore, the GPU EIR concluded that impacts would be less than significant.

The Project would be consistent with this analysis because it would not result in any development in locations or at intensities beyond what was contemplated in connection with the General Plan. In addition, there is no new information of substantial importance regarding this topic that was not known when the GPU EIR was prepared. Therefore, the Project would not result in a more severe impact than was identified in the GPU EIR.

d) Emergency Access: The GPU EIR concluded that implementation of the General Plan would increase land uses in the Planning Area, which would require additional emergency access. However, these new roadways and intersections would be designed to City design standards that account for emergency access and, therefore, should not result in inadequate emergency access. Construction of these new roadways and intersection would have the potential to result in impacts related to emergency service; nevertheless, these projects would be required to comply with CEQA and avoid or minimize such impacts as needed. Additionally, the updated Transportation Element has accounted for the potential impacts to emergency routes and has included Goal TE-9 to ensure that there are safe evacuation routes in case of emergencies and natural disasters. Therefore, the GPU EIR concluded that impacts would be less than significant.

The Project would be consistent with this analysis because it would not result in any development in locations or at intensities beyond what was contemplated in connection with the General Plan. In addition, there is no new information of substantial importance regarding this topic that was not known when the GPU EIR was prepared. Therefore, the Project would not result in a more severe impact than was identified in the GPU EIR.

Conclusion

With regards to the issue area, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

Tribal Cultural Resources

Would the project:

Issues and Supporting Evidence	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
a) A resource listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC §5020.1(k)?	☐	☐	☐
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC §5024.1? In applying the criteria set forth in subdivision (c) of PRC §5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☐

Discussion

As previously identified, the 6th Cycle Housing Element Update is a policy document that would not directly result in the construction, modification, or improvement of residential development in the City. The Housing Element identifies sites designated for residential development that were previously evaluated for potential tribal resource impacts in the 2040 GPU EIR. The Housing Element does not identify any additional sites for residential development or changing density standards.

a) and b) Historical and Tribal Resources: In June 2021, the City received a request for consultation from the Yocha Dehe Wintun Nation. City staff met with Mr. Laverne Bill, Director of Cultural Resources for the tribe. During that meeting, the tribe requested that the City include additional goals and policies in the General Plan to recognize, work with, and promote educational opportunities with Tribal Nations. These goals and policies have been included in the Historic & Cultural Resources Element of the General Plan.

Consultation with the tribe was ongoing during development of the General Plan update, and any significant tribal cultural resources that were identified were addressed through negotiations between the City and the Yocha Dehe Wintun Nation to prevent a substantial adverse change in the significance of the resource, incorporated into the GPU EIR as Mitigation Measure TCR-1. Also, no tribal cultural resources had been identified as of June 14, 2021. The City has not otherwise identified or been notified of any tribal cultural resources in the Planning Area. The records search conducted for Chapter 3.4,

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Cultural Resources, found that 51 archaeological resources have been recorded in the plan area. It is possible that these would be considered to be tribal cultural resources under AB 52, but such determination has not been made.

Multiple General Plan policies aim to identify, preserve, and protect archaeological resources and sites and enforce State mandates upon discovery of Native American remains or archaeological artifacts during construction. One goal emphasizes collaboration and consultation with Tribal Nations who first lived in the Napa area to recognize and preserve their identity, culture, and artifacts. To the extent future individual projects are subject to CEQA, consultation regarding further protections for any tribal cultural resources identified will occur through the AB 52 process.

If tribal cultural resources are identified or encountered during future development projects anticipated under the General Plan, the City would require one or more actions recommended under Mitigation Measure TCR-1. As such, the impact of the General Plan on tribal cultural resources would be less than significant with Mitigation Measure TCR-1 incorporated.

The Project would be consistent with this analysis because it would not result in any development in locations or at intensities beyond what was contemplated in connection with the General Plan. In addition, there is no new information of substantial importance regarding this topic that was not known when the GPU EIR was prepared. Therefore, the Project would not result in a more severe impact than was identified in the GPU EIR.

Conclusion

With regards to the issue area, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

Utilities and Service Systems

Would the project:

Issues and Supporting Evidence	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects?	☐	☐	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☐
c) Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand, in addition to the provider's existing commitments?	☐	☐	☐
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☐
e) Comply with federal, state and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐

Discussion

As previously identified, the 6th Cycle Housing Element Update is a policy document that would not directly result in the construction, modification, or improvement of residential development in the City. The Housing Element identifies sites designated for residential development that were previously evaluated for potential utilities and service systems impacts in the 2040 GPU EIR. The extension of utilities to service any proposed development under the Project is consistent with the City's General

Plan, and the Housing Element does not identify any additional sites for residential development nor does it change density standards. As such, the Housing Element will not, in and of itself, impact public utilities or service systems for communication, water, sewer, solid waste disposal, or storm drainage.

a) Utilities: The Project will not directly require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities.

Water: Water in the Planning Area is treated among three WTPs: Milliken WTP, Hennessy WTP, and Jamieson Canyon WTP. As concluded in the GPU EIR given the anticipated population growth rate, the City's 2020 UWMP, adopted in 2021, establishes the infrastructure necessary to provide the storage, treatment, and transmission facilities to serve future development, maintain overall service reliability, and honor existing export agreements through 2045. Furthermore, by updating the 2020 UWMP based on the 2040 General Plan projections and constructing facilities recommended in the plan, the City ensures that the potable water distribution system can support all future development. Publicly adopted water conservation actions, as well as increased availability of recycled water for irrigation and other nonpotable uses, further reduce potable water consumption, increasing the City's potable water supply portfolio and reducing wastewater generation rates. The GPU EIR concluded that, with adherence to the policies and regulations described therein for the General Plan, the General Plan would result in a less-than-significant impact regarding the need for relocation or construction of new or expanded water facilities, and no mitigation is required.

Wastewater: As more housing units are added to the City under the General Plan, additional capacity improvements may be needed at the wastewater treatment plant to balance peak flows, the construction of which could cause significant environmental effects. However, several measures are in place to address this impact. First, NapaSan is already planning for or in the process of updating some of its facilities to improve capacity, based on recommendations from its strategic plan, and will continue updating the WWTP Master Plan based on projected growth. These improvements are already underway (including current construction of major sewer system improvements to address known system deficiencies) and would likely occur regardless of the General Plan. Second, due to the encouragement of publicly adopted water conservation actions due to the current drought, as well as City water conservation mandates and regulations, per capita consumption may fall, easing some demand on the existing system. Third, the City and NapaSan are currently collaborating on opportunities to increase the use of recycled water for nonpotable irrigation and landscaping in the City, which can help offset some wastewater generation and can decrease the amount of treated wastewater that must be discharged to the Napa River because it would instead be diverted to recycled water use. Finally, the City is required to adhere to current General Plan policies that prevent issuance of a building permit or similar ministerial entitlement unless NapaSan can meet service needs for said development. As such, the GPU EIR concluded that, with adherence to the applicable goals, policies, and regulations described therein, the General Plan would result in a less-than-significant impact regarding the need for relocation or construction of new or expanded wastewater treatment facilities.

Electric Power, Natural Gas, and Telecommunications: Napa's population is expected to continue growing under the General Plan, which will increase the demand on current infrastructure for electricity, natural gas, and telecommunications, which could result in significant impacts on the environment. However, the specific distribution and timing of projected development that could be permitted under the General Plan is not known, and, thus, the specific expansions cannot be predicted. Future expansion or construction projects of electric, natural gas, and telecommunications lines and facilities would be required by law to operate in compliance and under permits of the City, and/or the governing bodies of those utilities prior to approvals. Current state and local codes address energy conservation in general and efficiency in new buildings, which further reduces wasteful energy use and relieves the systems of some demand. Current city, state, and federal rebate and incentive programs on energy efficient products and measures also contribute to efforts to reduce energy consumption and demand. Further, the General Plan contains goals and policies related to utilities and energy savings that would reduce the impact on the current electricity, natural gas, and telecommunications providers. As such, the GPU EIR concluded that, with adherence to the policies and regulations described above, the General Plan would result in a less-than-significant impact regarding the need for relocation or construction of new or expanded electric power, natural gas, or telecommunications facilities, and no mitigation is required.

Stormwater Drainage: Napa's projected population growth under the General Plan would potentially increase demand on the current infrastructure and stormwater drainage system operated by the City, as well as NapaSan, where all wastewater is treated, which could result in significant impacts. However, the City would require all future developments to comply with the requirements of the NCSPPP. Furthermore, the General Plan supports and promotes the use of green infrastructure, which is the use of natural approaches to capture, infiltrate, and reuse rainwater, instead of relying only on conventional methods for stormwater capture. Green infrastructure reduces and treats stormwater at its source, thus reducing strain on infrastructure while delivering environmental, social, and economic benefits. Goals and policies in the General Plan would support the City's ability to maintain an adequate level of service, would potentially reduce the demand on existing stormwater drainage facilities, and would ensure that future development prioritizes the use of green infrastructure in its stormwater management designs. Additionally, the City is actively working to improve the City's stormwater infrastructure via its Storm Drainage Master Plan and CIP and continuing coordination efforts with the District. Recommended improvements are already underway and would likely occur regardless. Construction or renovation of future stormwater drainage facilities would be subject to CEQA analysis. Compliance with existing regulations and implementation of the General Plan policies, and with the existing local, state, and federal regulations identified above, would reduce increases in stormwater velocity and volume to the maximum extent practicable, and compliance with SWRCB regulations would ensure that any new stormwater facilities that were built would not be environmentally harmful. As such, the GPU EIR concluded that the impact as related to the construction of new stormwater drainage facilities is less than significant, and no mitigation is required.

The Project would be consistent with this analysis because it would not result in any development in locations or at intensities beyond what was contemplated in connection with the General Plan. In

addition, there is no new information of substantial importance regarding this topic that was not known when the GPU EIR was prepared. Therefore, the Project would not result in a more severe impact than was identified in the GPU EIR.

b) Sufficient water supplies: City residents are supplied water from three sources that are used separately or collectively to meet its supply needs: Milliken Reservoir, Lake Hennessey, and water purchased under contract from the SWP. According to 2020 UWMP, in years when reservoirs are nearly full and rainfall is normal, Napa's supplies are currently adequate to meet demands. However, this is not always the case during periods of multiyear droughts, when customers must be asked to reduce usage. Although the City needs additional water supplies to accommodate projected growth during drought years, the overall demand projection is that the City can meet and maintain its demand for water in the coming years to 2045 under normal, dry, and multiple dry year scenarios, aided by public participation in water-saving measures, the water-saving benefits associated with local high performance building regulations, the MWELO, the local water offset program for new development, recycled water policies, and increased use of recycled water for nonpotable uses. Demand management measures and water shortage contingency plans are included in the 2020 UWMP and would be implemented by the City. Because the 2020 UWMP is based on the General Plan, the City ensures that water supply projections can support reasonably foreseeable future development.

Future proposed projects would be required to undergo CEQA review and to comply with all federal, state, and local water supply regulations including SB 610 and SB 221 (which determine if a project would be required to complete a WSA prior to project approval). Also, the City would require all new development to comply with all drought and water conservation requirements set forth under state and local regulations. Further, the General Plan includes goals and policies regarding water use conservation and efficiency policies that would help ensure that adequate water supplies are available to serve existing and planned development. As such, the GPU EIR concluded that, with adherence to the policies and regulations described therein, the General Plan's potential to result in insufficient water supplies available to serve anticipated growth and reasonably foreseeable future development during normal, dry, and multiple dry years is less than significant, and no mitigation is required.

The Project would be consistent with this analysis because it would not result in any development in locations or at intensities beyond what was contemplated in connection with the General Plan. In addition, there is no new information of substantial importance identified regarding this topic that was not known when the GPU EIR was prepared. Therefore, the Project would not result in a more severe impact than was identified in the GPU EIR.

c) Wastewater Treatment: NapaSan provides wastewater collection, conveyance, and treatment services to the Planning Area. Due to completed upgrades to the WWTP system in the past 10 years the existing WWTP has capacity to handle projected residential, commercial, and industrial water demands through 2030. A new, updated WWTP Master Plan is underway and will contain recommended capacity upgrades for year 2040 projections, including growth anticipated under the

General Plan. Furthermore, publicly adopted water conservation actions due to the current drought, state and local water conservation mandates, and increased use of recycled water, which would divert some water from the system, is anticipated to continue to reduce demand on the current WWTP system. Future proposed projects would be required to undergo CEQA review and the City would require all new development to comply with all drought and water conservation requirements set forth under state and local regulations, which would further reduce wastewater generation in NapaSan's service area. Implementation of the General Plan goals and policies would help reduce the amount of wastewater generated and reduce the demand on existing service. As such, the GPU EIR concluded the General Plan would result in a less-than-significant impact regarding the potential to result in a determination by the wastewater treatment provider that it has inadequate capacity to serve the Planning Area's projected demand in addition to the provider's existing commitments; therefore, no mitigation is required.

The Project would be consistent with this analysis because it would not result in any development in locations or at intensities beyond what was contemplated in connection with the General Plan. In addition, there is no new information of substantial importance regarding this topic that was not known when the GPU EIR was prepared. Therefore, the Project would not result in a more severe impact than was identified in the GPU EIR.

d) and e) Solid Waste: Projected population growth under the General Plan would lead to additional demands for solid waste disposal services. If the increased demand exceeds infrastructure capabilities (i.e., landfill capacity) or standards and goals, the impact could be significant. However, the Potrero Hills Landfill in Suisun City is expected to have adequate capacity until at least 2044. In addition, implementation of state laws and policies to reduce the waste stream and extend the lifespan of the landfill, such as AB 341 (discussed above), are expected to extend the capacity. The City and NRWS have both instituted several programs and policies that have brought the City much closer to zero waste. Goals and policies in the General Plan support efforts to achieve a high level of waste diversion, minimize the generation of waste, increase recycling, encourage composting, and provide for the collection and disposal of solid waste. In the future, as Potrero Hills Landfill reaches capacity, the RWQCB will address expansion or closure options. NRWS would also apply to the City for future necessary expansion of their system to meet the City's projected demands. In addition, future development in the City would be required to undergo separate environmental review under CEQA to ensure adequate landfill capacity to serve new development prior to approval.

The City's Recycling and Solid Waste Division is responsible for implementing all solid waste programs in the City. NRWS and the Potrero Hills Landfill are required by their respective permits to operate in accordance with state laws and regulations. The City's municipal code also addresses solid waste diversion requirements and proposed General Plan policies in the Climate Change and Sustainability and Community Services, Parks, and Recreation Elements specify 75 percent diversion of solid waste by 2022 through increased solid waste recycling and reuse methods, diversion, and

overall reduction in waste generation. Therefore, this impact would be less than significant, and no mitigation is required.

The Project would be consistent with this analysis because it would not result in any development in locations or at intensities beyond what was contemplated in connection with the General Plan. In addition, there is no new information of substantial importance regarding this topic that was not known when the GPU EIR was prepared. Therefore, the Project would not result in a more severe impact than was identified in the GPU EIR.

Conclusion

With regards to the issue area, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.