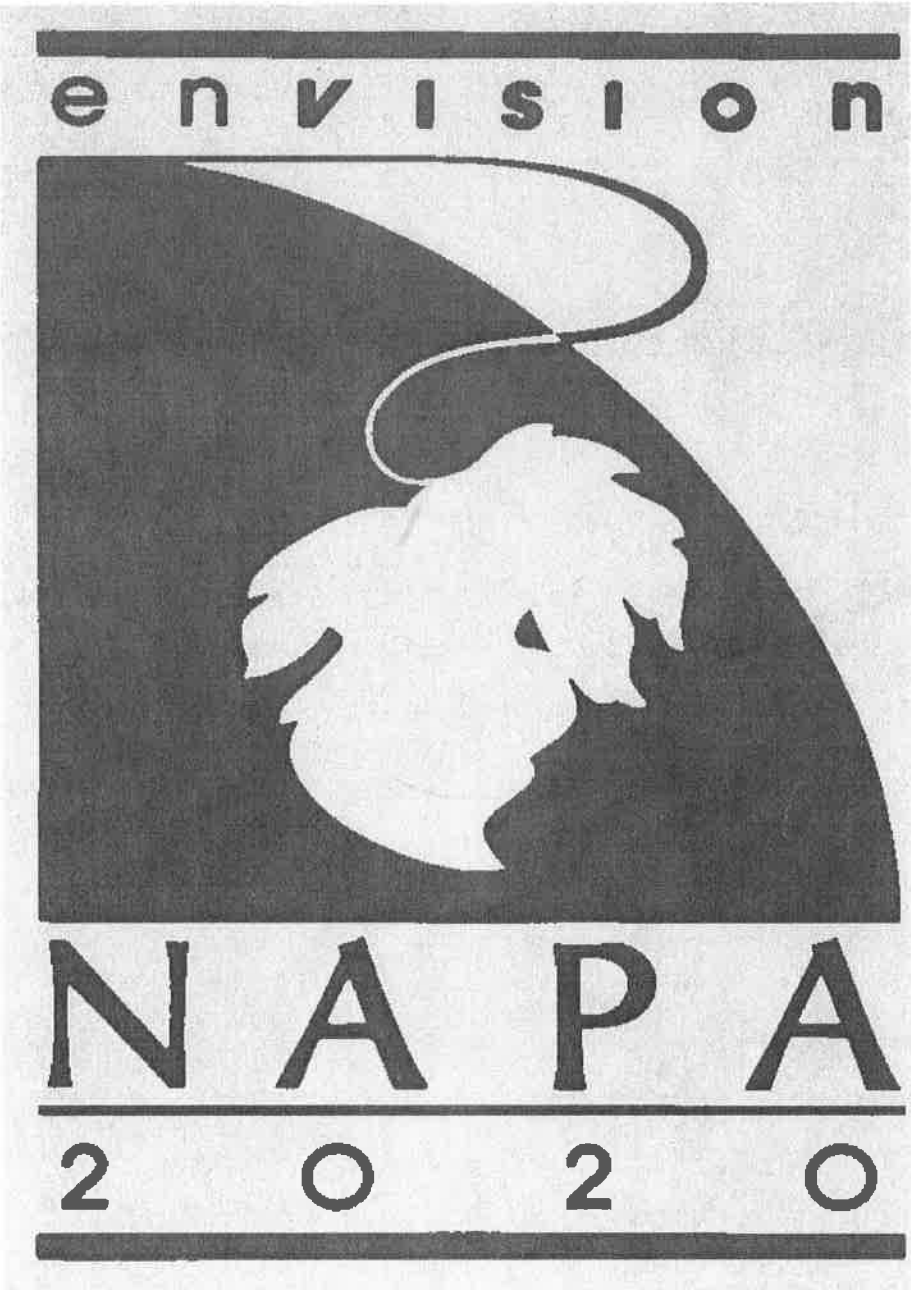
APPENDIX E



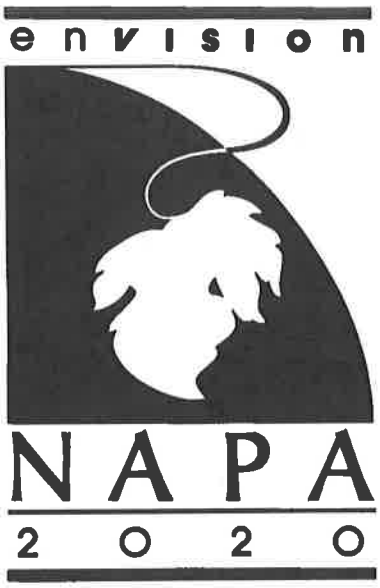
CITY OF NAPA GENERAL PLAN

FINAL ENVIRONMENTAL IMPACT REPORT

SCH # 95-03-3060

ADOPTED DECEMBER 1, 1998

APPENDIX E



CITY OF NAPA GENERAL PLAN

Adopted by the
Napa City Council
DECEMBER 1, 1998

FINAL Environmental Impact Report

State Clearinghouse #95-03-3060

APPENDIX E



CITY OF NAPA GENERAL PLAN

Final
Environmental Impact Report

State Clearinghouse # 95-03-3060

As Certified by City Council
Resolution 98-238

December 1, 1998

APPENDIX E

Table of Contents

	ADDENDUM TO FEIR	**1**
P	**PREFACE TO REVISED DEIR**	**P-1**
S	**SUMMARY**	**S-1**
1	**INTRODUCTION**	**1-1**
1.1	Purpose of this Environmental Impact Report	1-1
1.2	Approach to the Napa General Plan EIR	1-2
1.3	Environmental Impact Review Process	1-2
1.4	Use of this Document	1-6
2	**PROJECT DESCRIPTION**	**2-1**
2.1	Project Background	2-1
2.2	Project Location	2-1
2.3	Project Area	2-1
2.4	Project Characteristics	2-1
3	**ENVIRONMENTAL ANALYSIS**	**3.1-1**
3.1	Introduction	3.1-1
3.2	Land Use	3.2-1
3.3	Transportation	3.3-1
3.4	Community Services and Utilities	3.4-1
3.5	Cultural Resources	3.5-1
3.6	Visual Quality	3.6-1
3.7	Biological Resources	3.7-1
3.8	Geology, Soils, and Seismicity	3.8-1

Table of Contents (continued)

3.9	Hydrology	3.9-1
3.10	Air Quality	3.10-1
3.11	Noise	3.11-1
3.12	Public Health and Safety	3.12-1
4	**OTHER CEQA ISSUES**	**4-1**
4.1	Introduction	4-1
4.2	Unavoidable Adverse Impacts	4-1
4.3	Growth-Inducing Impacts	4-1
4.4	Cumulative Impacts	4-2
4.5	Significant Irreversible Environmental Changes Resulting from Implementation of the Project	4-8
4.6	Mitigation Measure Monitoring and Reporting	4-8
5	**ALTERNATIVES**	**5-1**
5.1	Introduction	5-1
5.2	Description of Alternatives	5-2
5.3	Alternative Analysis	5-9
6	**REFERENCES**	**6-1**
7	**LIST OF PREPARERS**	**7-1**
APPENDICES		
A	Notice of Preparation & Responses	
B	Policy Resolution No. 27 – Standard Mitigation Measures and Conditions of Approval	
C	General Plan Consistency with the Congestion Management Plan	
D	Supplemental Traffic Analysis Excluding Sousa Lane	

List of Figures

Figure Number		Page Number
2-1	Regional Location of Project Site	2-2
2-2	Project Area and Rural Urban Limit	2-3
2-3	RUL Adjustment Areas	2-6
2-4	Napa Planning Areas	2-17
3.2-1	RUL Adjustment Areas - Soils	3.2-6
3.11-1	Land Use Compatibility for Community Noise Environments	3.11-5
5-1	Scenario A-5 (Reduced Growth Alternative 3)	5-4
5-2a	Scenario B-1 (Expanded RUL Alternative)	5-5
5-2b	Scenario B-1 (Expanded RUL Alternative)	5-6

List of Tables

Table Number		Page Number
S-1	Proposed Project Summary of Impacts and Mitigation Measures	S-10
1-1	Napa General Plan Documentation in Satisfying EIR Requirements	1-5
2-1	City of Napa General Plan Goals	2-7
2-2	General Plan Land Use Designations	2-13
2-3	Future Residential Development in Napa RUL by Planning Area	2-16
2-4	Napa RUL Population and Employment Projections	2-18
3.2-1	Existing (1992) Land Uses in the RUL	3.2-1
3.3-1a	Level of Service Definitions – Signalized Intersections	3.3-1
3.3-1b	Level of Service Definitions – Unsignalized Intersections	3.3-2
3.3-2	Intersection Levels of Service (P.M. Peak Hour)	3.3-3
3.3-3	Future Roadway Improvements	3.3-7
3.3-4	Comparison of External Traffic Conditions	3.3-12
3.4-1	NSD Primary Service Area Population Projections	3.4-13
3.7-1	Sensitive Plant and Wildlife Species Known to Occur in the Napa Area	3.7-4

Table of Contents (continued)

3.10-1	Clean Air Plan TCMs to be Implemented By Local Government	3.10-2
3.11-1	City of Napa Existing 1992 Roadway Noise Contours	3.11-2
3.11-2	City of Napa Projected 2020 Roadway Noise Contours	3.11-7
4-1	Cumulative Growth Forecasts	4-4
5-1	Development Potential by Alternative	5-7

The following are bound with, and a part of this Final EIR:

12/8/97 Response to Comments to 1996 Draft EIR

4/24/98 Response to Comments to 12/8/97 Revised Draft EIR

The following are part of this Final EIR by reference:

1996 Draft General Plan Policy Document

1996 Draft General Plan Background Report

Addenda #1 -- #13 and Errata #1 & #2 as included in Planning Commission Reso. 98-068

June 26, 1996 Revised Draft Policy Document as recommended by the Planning Commission and revised by the City Council through the adoption of CC Resolutions 98-238 and 98-239

CITY OF NAPA GENERAL PLAN

ADDENDUM TO FINAL ENVIRONMENTAL IMPACT REPORT

Providing Analysis of City Council adjustments adopted in the General Plan Policy Document and including a description of revisions made to the Revised Draft EIR.

December 1, 1998

APPENDIX E

Addendum to Final Environmental Impact Report

Prepared for: ***Envision Napa 2020***, City of Napa General Plan

FINAL EIR ADDENDUM

This is an Addendum to the Draft Final Environmental Impact Report prepared for the City of Napa General Plan Update, *Envision Napa 2020.* The Addendum has been prepared to document the final direction of the City Council in certifying the Final EIR for the General Plan and to specify the revisions to the text of the FEIR that are adopted by the City Council based on information already in the record. The Final EIR includes the 12/8/97 Revised EIR, the 12/8/97 Response to Comments on the Draft EIR, the 4/24/98 Response to Comments on the Revised Draft EIR, the Addendum to the Final EIR and the supporting information in the General Plan Policy Document and Background Report (as specified on page 1-2 of the RDEIR). This Addendum includes a Table of Contents of the entire FEIR, a summary discussion and analysis of the final direction given by the City Council for the General Plan, a final version of the "Summary of Impacts Table" for the Final EIR, and a list of specific text changes with page revision referenced to the Revised Draft EIR.

THE CITY OF NAPA GENERAL PLAN, ENVISION NAPA 2020

Under California law, (Government Code section 65300 et seq.), the City must prepare and adopt a comprehensive, long-term General Plan for the physical development of the city and any land outside its boundaries which, in the city's judgment, bears relation to its planning. Envision Napa 2020, The City of Napa General Plan, is a comprehensive update of the 1982 General Plan and formalizes a long-term vision for the physical evolution of Napa and outlines policies and programs to guide day-to-day decisions concerning Napa's development through the year 2020. The General Plan consists of two documents; the Policy Document, which presents the City of Napa's formal statements of General Plan policy in the form of goals, policies and implementation programs; and, a Background Report, which provides detailed descriptions of the existing physical and regulatory environment under which the General Plan is prepared. Section 15150 of the CEQA Guidelines authorizes the use of incorporation by reference of any portion of relevant documents that provide general background to an EIR. Accordingly, the General Plan documents have been characterized as components of the EIR throughout the public review process and remain an integral part of the CEQA documentation.

THE FINAL ENVIRONMENTAL IMPACT REPORT (FEIR)

The Final Environmental Impact Report (FEIR) has been prepared for Envision Napa 2020, to evaluate the effects of adopting and implementing the City's General Plan. The General Plan FEIR is considered a "Program EIR" because it evaluates the potential environmental impacts of a series of future actions based on an understanding of the overall setting, without the availability of project level details. The certified FEIR will provide baseline environmental information to be used in the future by the City when making decisions that implement the policies and programs of the General Plan. In using the Final EIR, the City may rely solely on the FEIR or may prepare additional environmental documents. The decision whether further review is required will depend on the particular activity proposed, the form of the proposed approval, and the circumstances existing at the time of the proposed approval.

GENERAL PLAN EIR REVIEW PROCESS

The Draft EIR for the Draft City of Napa General Plan, *Envision Napa 2020*, was formally released for public review on October 4, 1996, marking the beginning of a 45 day mandatory review period concluding on November 18th. In response to requests made at the October 17 and 24, 1996 Draft EIR hearings the Planning Commission extended the review period to December 2,1996, resulting in a total Draft EIR review period of 60 days.

On October 4, 1996, copies of the Draft EIR and other Draft General Plan Documents were sent to 30 organizations and local, state and federal agencies either directly or through the State Clearinghouse. Additional document sets were provided to local organizations such as the Chamber of Commerce, Board of Realtors, etc. Fifteen sets of the Draft General Plan Documents and DEIR were submitted to the State Clearinghouse along with a Notice of Completion indicating the desired distribution for state agency review. A "Notice of Completion and Availability" of the Draft General Plan and DEIR documents was mailed to 409 individuals who had requested written notice of General Plan availability and proceedings. A display ad was published in the local newspaper notifying the public of document availability and the public review and comment process. Copies of the Draft EIR and General Plan documents were made available for review at the City of Napa Planning Department and at the City/County Library. Copies of all documents were also provided for check-out or purchase at the Planning Department.

On November 18, 1996, a notice of extension of the public review period to December 2 was sent to all agencies and parties previously noticed as described above and another display ad regarding the extension was published in the local newspaper. On November 25, the City published an additional notice in the newspaper regarding the availability of Addenda to the General Plan Policy Document. It should be noted that the Addenda had been distributed to the Planning Commission and informally made available to the public in late October 1996 and that additional Addenda and Errata were released throughout the review process to document corrections and staff recommended revisions to the draft General Plan..

Although not legally required by CEQA, during the public review period, the Planning Commission held hearings on October 17th and October 24, 1996, to receive input on the Draft EIR. Also during the public review period, the Planning Commission held six study sessions on the General Plan Documents. These study sessions were noticed and open to the public; and, in most cases, occurred as the last item on a regular Planning Commission Agenda.

DEIR Response to Comments

By the close of the extended review period on December 2, 1996, the City had received 38 written communications. During the two public hearings on the Draft EIR held on October 17th and October 24th, the City received oral testimony from seven individuals. After the close of the public comment period on December 2nd, the City received three additional written communications. The communications and hearing record constituted a total of 344 separate comments, each requiring a written response. The response to comment process of CEQA does not require responses to non-environmental comments; however, in the interest of continuity, responses were provided for both General Plan and DEIR comments.

Responses were prepared for comments dealing with all subjects and concerns related to both the Draft EIR and the General Plan. The Draft EIR Response to Comments Document was released for public review on December 8, 1997.

Recirculation of the Draft EIR as the "Revised Draft EIR"

Section 15088.5 of the State CEQA Guidelines requires recirculation of an EIR when significant new information is added to the EIR after the draft has been released for public review. While the City did not feel recirculation of the Draft General Plan EIR was required by the CEQA Guidelines in this case, the City nonetheless revised and recirculated the Draft EIR to:

- Expand the background information concerning several categories of impacts
- Provide more detailed explanation of environmental conclusions
- Reexamine findings of significance for several impacts
- Provide an opportunity for public comment on this additional information.

The City believes recirculation resulted in a more informed discussion of the General Plan and ultimately led to a more complete set of General Plan goals, policies, and implementation measures.

The Draft EIR was revised in the following ways:

1. A verbatim copy and a summary of all comments received on the Draft General Plan and the Draft EIR during the public review period in the Fall of 1996 and a response to all comments were added to the Draft EIR.

2. The project description was revised to:

   a. Adjust the RUL to include a 5 acre parcel at the northeast corner of Trancas and Silverado Trail and to designate it TC - Tourist Commercial. The subject parcel has been incorporated land under City's jurisdiction since March 1973 and is inside the City's Sphere of Influence. (Addendum #1)

   b. Designate land outside the proposed RUL as "G" - Greenbelt. This represents a continuation of the designation in the existing General Plan. (Addendum #2)

   c. Revise the General Plan to reflect the adoption of the Big Ranch Specific Plan in October 1996. These changes involve land use designations, circulation adjustments and minor text references to the status of the Big Ranch Specific Plan. (Addendum #3)

   d. Eliminate the Sousa Lane roadway connection in transportation project list. (Addendum #4)

3. The text of the Draft EIR was revised to add or correct descriptive information based on comments on the Draft EIR.

4. Significance criteria for some types of impacts were revised based on reconsideration and review of other related environmental documents.

5. Findings of Significance for several types of impacts were revised based on reconsideration and review of other related environmental documents.

The Revised Draft EIR (RDEIR) showed changes made to the October 1996 Draft EIR through single line underline and strike out.

The Revised Draft EIR (RDEIR) along with the Response to Comments on the Draft EIR, were subject to a 45 day noticed comment period from December 8, 1997 through January 21, 1998. Document sets were sent to the public agencies both directly and through the Governor's Office of Planning and Research (OPR) according to the process previously used for circulation of the Draft EIR and Draft General Plan documents..

Revised Draft EIR Response to Comments

During the 45 day circulation of the Revised Draft EIR, sixteen written communications were received containing a total of 72 individual comments on the Revised Draft EIR, and Draft General Plan documents. The City prepared a response to the comments received on the Revised Draft EIR and released the RDEIR Response to Comments on April 24, 1998, circulating the document to local, state and federal agencies and to the State Clearinghouse according to the process used for the DEIR and RDEIR. On April 24, 1998 a "Notice of Planning Commission Hearings on the Draft General Plan and Revised Draft Environmental Impact Report and Response to Comments (draft Final EIR)", including a Notice of Availability of the RDEIR Response to Comments, was mailed to individual citizens who had requested written notice of the General Plan availability and proceedings and was published as a display ad in the Napa Register.

Planning Commission Review, Hearings and Recommendation

The Planning Commission held a public hearing on the Draft General Plan and Draft Final EIR on May 7, 8 and 9, 1998 and took testimony from 63 different speakers during the three-day hearing. On May 28, 29, 30 and June 4, 1998, the Planning Commission conducted deliberations on the Draft General Plan and Draft Final EIR and drafted recommendations to the City Council. The Planning Commission recommendations included proposed revisions to text in the Policy Document that would further mitigate environmental concerns expressed by the public and strengthen the mitigating ability of general plan policies. General Plan policy recommendations that addressed environmental concerns included:

- The RUL (Rural Urban Limit) line should not be moved; the area designated for urban development should not be expanded.

- Carry forward the SA-Study Area land use category from the 1982 General Plan and allow it to remain as the designation for Stanly Ranch so that the more detailed environmental information in the pending specific plan and project EIR can be used to determine the most appropriate land use designations for this portion of the City's planning area.

- Carry forward the Greenbelt designation from the 1982 General Plan for lands adjacent to the City but outside of the RUL and create a continuous Greenbelt around the RUL by adding lands to the east and west of the City.

- Add another land use category to the General plan called "RA-Resource Area" which will be applied to sensitive lands inside the RUL that require special standards due to viewshed, resource, habitat, geotechnical, or other considerations in order to further the conservation and resource protection goals of the General Plan. Conduct a study of lands that may require special standards due to these environmental constraints and apply the RA-Resource Area designation where appropriate. Allow up to one dwelling unit per existing parcel.

- Enhance language regarding Open Space throughout the text of the General Plan to clarify the City's desire to coordinate open space objectives with resource protection, the preservation of agricultural land outside the RUL, maintenance of outdoor recreation areas and public safety concerns related to seismic, flood, fire and other risks. Strengthen references to the Open Space Action Program (Appendix F of the Policy Document).

- Add a "Napa River" section to the Land Use Element that includes policies that recognize the considerations identified and created by the Napa River Flood Management Project and commit to strengthening watershed protections in making future decisions. (Goal LU-9 and related policies in 6/26/98 PC Policy Document)

- Adopt revisions to policies in the Community Service Element to specify how the City will implement the Regional Water Quality Control Board Requirements for storm water run-off. (Implementation Program CS-11.A)

- Revise policies in the Natural Resource Element to support the use of the Napa County Resource Conservation District "Owners manual" as a valuable educational resource to guide the design of project grading and drainage in sensitive areas. (NR-3.1)

- Revise Policies and Implementation Programs in the Natural Resource Element to encourage new development to protect and enhance on-site habitat and incorporate it into the project and to utilize sensitive construction practices that minimize erosion, sedimentation, and damage to important features to be protected (NR-1,6, NR-1.C, NR-1..E).

- Revise policy language and implementation programs in the Land Use Element to allow for further evaluation of City gateways, their location and components, and to support the preparation of guidelines for private and public development to protect scenic resources in gateway areas (LU-1.A, LU-1.5).

- Strengthen support for mitigation of tree removal in viewshed areas both during and after project development (LU-10.C).

- Strengthen the language of various policies and programs in the Transportation Element to further support non-automobile modes of transportation (T-9.9, T-9.10, T-5.17, T-5.1, T-5.8).

- Add policies and implementation language to the Transportation Element to strengthen/clarify certain traffic mitigations and to address the potentially significant impact related to regional traffic (Addenda #9 & #13, T-1.1, T-1.D, T-1.E, T-2.4, T-2.7).

- Revise certain policies and programs in the Land Use Element to protect neighborhoods from potentially harmful and incompatible uses (LU-4.C, LU-4.E, LU-4.D, LU-4.F).

- Add an implementation program to the Community Services Element that serves as a mitigation measure to reduce the level of significance for wastewater impacts to less than significant (Addendum #7 incorporated as Policy CS-10.3).

- Add an implementation program to the Community Services Element to provide mitigation to reduce the potentially significant drought year water supply impact identified in the RDEIR (Addendum # 6 incorporated as Policy CS-9.3).

- Add policy language to the Natural Resource Element to address the potentially significant impacts to endangered species (RDEIR p. 14 - Response to Comment 49.3, Addendum #12, NR-2.4, NR-2.A, NR-2.B).

Only one of these, the last item regarding potential impacts to endangered species, changed the environmental conclusion of an impact category and resulted in a text revision to the *Draft* Final EIR. These revisions were specified in Addendum # 12 and included in the public notice.

The Planning Commission recommended certification of the draft Final EIR (as revised) and the incorporation of the recommended modifications to the General Plan Policy Document as further mitigations.

City Council Hearings, Consideration and Action

The Planning Commission discussed their recommendations on the draft General Plan and *Draft* Final EIR with the City Council during a study session on September 24, 1998. Following a two day public hearing on September 28 and 29, 1998 on the Draft General Plan, *Draft* Final EIR, the City Council considered the information in the *Draft* Final EIR, the recommendation of the Planning Commission, public comments and the administrative record and, on October 13 gave direction to staff to prepare documents reflecting their preliminary decisions regarding the *Draft* Final EIR and the General Plan.

The Council agreed with the Planning Commission recommended Policy Document revisions that incorporated further mitigations into the General Plan and made the following additional revisions to address environmental concerns:

- Revise the RA-Resource Area designation to allow up to one dwelling unit per 20 acres.

- Place the RA-Resource Area designation on the Napa Oaks property (Pod 123). Information included in the General Plan EIR and in studies prepared for previous project applications show that this hillside property has serious constraints to development due to slopes, significant stands of vegetation, habitat, seismic risks, water supply and limited access. This hillside is an important viewshed for the City and is partially within the Carneros wine growing region.

- Emphasize the need to continue to monitor, study and update the transportation policies and implementation programs to address traffic impacts associated with ongoing development (T-1.G).

APPENDIX E

CEQA ANALYSIS OF COUNCIL REVISIONS TO GENERAL PLAN

This analysis provides information on how each of the revisions contemplated for the final General Plan are within the scope of analysis presented in the *Draft* Final EIR and do not present new information or result in significant environmental impacts not already disclosed during the public review process.

1. The RUL (Rural Urban Limit) line should not be moved; the area designated for urban development should not be expanded.

The decision not to expand the RUL does not change the existing growth boundary of the City and does not result in new impacts on lands not previously contemplated for urban development. Certain impacts (both insignificant and significant) identified in the *Draft* Final EIR will be further reduced by maintaining the existing RUL such as those related to demand on infrastructure and capacity in outlying areas, use of agricultural and other open space land for urban purposes, potential impacts on biological resources, wildlife and habitat and alterations to viewsheds and gateways that provide the setting and character for the City.

The decision not to expand the RUL does not result in increased impacts within the RUL due to the diversion of housing units. The housing potential projected for the RUL expansion areas had a potential maximum range of up to 268 dwelling units. It should be understood that the development numbers in the General Plan are theoretical and for long range planning purposes and therefore, slight alterations that might be assumed by the elimination of the RUL expansion areas do not affect the overall concept for the Plan or its potential environmental effect in the impact categories analyzed by the EIR. The numbers shown in Table 1-2 of the 1996 Draft General Plan are still considered reasonable for planning purposes given the 2020 horizon of the General Plan. The theoretical figures provided in Table 1-2 will vary during implementation of the Plan due to several factors including:

- Future residential development could be implemented anywhere within the ranges specified by the General Plan and may not always achieve the maximum number of units projected by the plan for a planning area.

- Neighborhood character considerations in the General Plan will influence the number of units that will be approved.

- Project level CEQA review will influence the number of units that may be developed on a project site.

- Vacant land constraint assumptions made during General Plan capacity studies could be either greater or less on a project by project basis and certain parcels may provide more or less capacity than theoretically anticipated.

- The recent certainty of the Flood Control Project has made available previously constrained lands for mixed use development that have a potential residential use of up to 40 units per acre. This potential was not included in the housing projections for the General Plan because it was not certain, at the time, whether this land could be available for such development. There are still variables that make it difficult to determine the actual dwelling unit potential in these areas until there is certainty regarding the ultimate design of the flood project. (It should be noted that the MU designation was applied to land in the 1996 draft General Plan and the potential impact of development in these areas was therefore considered in the General Plan EIR.)

- There is no way to predict where and at what rate construction will actually take place; or whether the anticipated number of units listed in the plan will ever be built.

The variations to actual location, rate, and intensity of development are unknown at this time and therefore, analysis of the potential impacts that might result from variations in development would be speculative with the General Plan EIR and can only be determined during tiered CEQA review on a project by project basis.

The decision not to expand the RUL does not result in an inability for the City to meet its fair share of regional housing as specified in the City's Housing Element (Certified by the California Department of Housing and Community Development, 1992). The new General Plan as revised by the City Council (10/13/98 direction to staff), leaves the City with sufficient land to accommodate its "fair share" of housing at all levels of affordability. Recognizing the variables associated with future development, the City will continue to pursue the policies and programs of the certified housing element in an effort to encourage certain types and densities of development that will achieve the objectives for providing housing affordable to all segments of the community. As noted above, the pending flood control project, recently made a certainty with the approval of Measure A (tax increment funding approved by the voters) will make possible the development of dwelling units at up to 40 units per acre in areas previously constrained by flood hazards. Most of these areas have been designated MU-Mixed Use under the new General Plan. A refined projection of development potential in the Flood Project Area will be possible when the details of flood control design are known and the City completes urban planning in the area (as specified under Goals LU-6 and LU-9 in the 6/26/98 PC Policy Document). Even though the potential MU dwelling unit "numbers" were not included in dwelling unit totals for the General Plan, the "MU –Mixed Use" designation was applied to land in the flood area as part of the 1996 draft General Plan and the potential impacts of development in these areas was therefore considered in the General Plan EIR.

For the reasons stated above, the actual density, rate and location of development is speculative; however, all of the development will occur within the same urban area as defined by the 1982 General Plan and the area anticipated by the certified Housing Element as providing for housing to meet its objectives. Exhibit A, attached to this Addendum, consists of a study conducted by Planning Staff in 1996, to determine how the 1996 draft General Plan housing potential compared with the objectives of the certified Housing Element. The results of the study demonstrate that the new Plan can meet the objectives of the Housing Element. Even when numbers are subtracted from the theoretical total to account for maintenance of the RUL and other adjustments resulting from the approved Plan, the study demonstrates these changes are insignificant for statistical purposes and that the overall housing projections will meet the objectives of the Housing Element. The study also demonstrates how the new General Plan redistributes the high percentage of medium density units from the 1982 General Plan to more evenly provide dwelling units at all ranges of housing types. Since the projected housing development will occur within the same area defined by the 1982 General Plan, and will not result in development of land area not already contemplated for urban use by the General Plan EIR, the issue of providing fair share housing does not raise new environmental issues not already addressed by the Final EIR.

It should be noted that the housing element update, due in 2001, will provide the City with an opportunity to refine the housing numbers based on a systematic review and consideration of the most current information available at that time (including Census 2000, a fair share housing determination from ABAG, jobs and housing demand information from the pending Economic Element, and greater planning detail related to the flood project).

It should also be noted that the regular General Plan review and update process required by Policies and Implementation Programs under Goal A-1 in the Administration Element of the General Plan, serve to monitor the rate and location of development and allow updates of development figures during the implementation of the Plan.

2. Carry forward the SA-Study Area land use category from the 1982 General Plan and allow it to remain as the designation for Stanly Ranch so that the more detailed environmental information in the pending specific plan and project EIR can be used to determine the most appropriate land use designations for this portion of the City's planning area.

The General Plan EIR considered a possible development scenario for the Stanly Ranch, as described in the 1996 draft Policy Document, for the purpose of city-wide traffic modeling and analysis of potential impacts at a city-wide, program level. The decision to maintain the SA-Study Area designation for the Stanly Ranch essentially does not include the area in the General Plan update and simply carries forward the 1982 land use designation for the property. The SA designation does not increase any potential impacts not already considered in the General Plan EIR. It requires that the property undergo a Specific Plan process, subject to a detailed environmental review before the appropriate configuration of land use is determined. The resulting land use plan will be required to be consistent with

the Policies of the new General Plan and, therefore, the mitigating effect of those policies will apply to future development of the Stanly Ranch just as they apply to any other future development in the City. The decision to carry forward the SA designation for the Stanly Ranch does not result in any new impacts not considered by the FEIR.

3. ***Carry forward the Greenbelt designation from the 1982 General Plan for lands adjacent to the City but outside of the RUL and create a continuous Greenbelt around the RUL by adding lands to the east and west of the City.***

The decision to carry forward the Greenbelt designation and expand the Greenbelt area outside of the RUL is does not affect the environmental conclusions of the General Plan EIR. Although not specifically defined in the 1996 Draft Policy Document, the Greenbelt works in concert with the concept of the RUL for confining urban growth in order to preserve open space and agricultural land outside the City. The Greenbelt designation does not call for any new development not already allowed under the County's regulations and therefore does not result in any new impacts not considered by the FEIR.

4. ***Add another land use category to the General plan called "RA-Resource Area" which will be applied to sensitive lands inside the RUL that require special standards due to viewshed, resource, habitat, geotechnical, or other considerations in order to further the conservation and resource protection goals of the General Plan. Consider low intensity uses, including rural residential (to a maximum of 1 dwelling unit per 20 acres) or agriculture under a discretionary permit on a case by case basis. Conduct a study of lands that may require special standards due to these environmental constraints and apply the RA-Resource Area designation where appropriate. Allow up to one dwelling unit per existing parcel.***

The purpose of the RA-Resource Area designation is to further protect lands within the RUL that have particular sensitivity due to viewshed, resource, habitat, geotechnical and other considerations. The Planning Commission deliberated at length over the need to recognize that certain properties in the RUL might not be appropriate for development under any of the designations listed in the 1996 draft General Plan Policy Document. During discussion on several aspects of the General Plan, they expressed concern over the visual importance of undeveloped hillsides and other open land in defining the character of the community and its gateways. Lengthy discussion was conducted over policy wording for effectively addressing development impacts to resources, habitat, erosion prone areas, drainage systems and hazardous areas. Although agricultural use was considered as a possible alternative for some sites, it was concluded that designating lands agricultural with no restrictions could be problematic and might not completely meet the objectives for protecting sensitive hillside areas and protecting important vegetation and habitat. It was noted that some agricultural activities such as vineyards, if located on hillsides above existing residential development, may cause erosion, have undesirable effects on stream habitat, water quality, on surrounding residential uses and on the City's storm drain system.

As a result of these concerns, the Commission recommended that a new land use category be included in the General Plan called the RA-Resource Area designation (see page 1-30 of 2/26/98 PC Policy Document). In order to effectively implement the RA designation, address the concerns over potential impacts of any development, and allow assessment of uses to determine if they further the conservation and resource protection goals of the General Plan, the Commission recommended Implementation Program LU-10.B, which requires revision to the Zoning Ordinance Section 17.10. This Section will be renamed AR-Agricultural-Resource District and all uses, including agricultural uses will be subject to review and discretionary approval under the Conditional Use Permit process. Implementation Program LU-10.B is included to provide for the future RA designation of specific areas in the RUL.

The addition of the RA designation represents a modification to the General Plan in response to environmental concerns and is not considered new information, but another way of applying mitigation already described in the General Plan. It is considered a tool that further implements the Land Use, Natural Resource and Health and Safcty policies of the General Plan that already serve as mitigation for impacts that could occur from development of particularly sensitive properties. For these reasons, the RA designation does not result in any new impacts not considered by the FEIR.

5. ***Enhance language regarding Open Space throughout the text of the General Plan to clarify the City's desire to coordinate open space objectives with resource protection, the preservation of agricultural land outside the RUL, maintenance of outdoor recreation areas and public safety concerns related to seismic, flood, fire and other risks. Strengthen references to the Open Space Action Program (Appendix F of the Policy Document).***

The strengthening of open space language throughout the General Plan clarifies how the Plan addresses this State mandated subject. The new language does not constitute new information, does not alter the conceptual development pattern and therefore does not result in any new impacts not considered by the FEIR.

6. ***Add a "Napa River" section to the Land Use Element that includes policies that recognize the considerations identified and created by the Napa River Flood Management Project and commit to strengthening watershed protections in making future decisions. (Goal LU-9 and related policies in 6/26/98 PC Policy Document)***

The addition of Goal LU-9 and accompanying policies and programs clarifies the current status of flood control implementation and planning. This information is included in more general terms in the Downtown Section of the Land Use Element, in the Natural Resource Element, in the Community Services Element and in the Health and Safety Element. The additional language provides a commitment to more detailed planning related to the River that was not possible until funding of the flood control project was a certainty. The new language further enhances the existing river related policies that serve as mitigation and does not result in any new impact not considered by the FEIR.

7. ***Adopt revisions to policies in the Community Service Element to specify how the City will implement the Regional Water Quality Control Board Requirements for storm water run-off. (Implementation Program CS-11.A)***

The new language added to Implementation Program CS-11.A is a direct result of a comment on the RDEIR made by the Regional Water Quality Control Board. The revision clarifies the specific elements that need to be included in the City's storm water master planning efforts to effectively mitigate the potential impacts to water quality. The new language clarifies a mitigation measure and does not result in any new impact not considered by the FEIR.

8. ***Revise policies in the Natural Resource Element to support the use of the Napa County Resource Conservation District "Owners Manual" as a valuable educational resource to guide the design of project grading and drainage in sensitive areas. (NR-3.1)***

The addition of this reference to the Napa County Resource Conservation District "Owners Manual" provides further information and detail on effectively implementing mitigations to erosion and water quality impacts. This revision does not result in any new impact not considered by the FEIR.

9. ***Revise Policies and Implementation Programs in the Natural Resource Element to encourage new development to protect and enhance on-site habitat and incorporate it into the project and to utilize sensitive construction practices that minimize erosion, sedimentation, and damage to important features to be protected (NR-1.6, NR-1.C, NR-1..E).***

The revisions to policies and implementation programs in the Natural Resources Element were done to improve the mitigating ability of the General Plan and do not result in any new impact not considered by the FEIR.

10. ***Revise policy language and implementation programs in the Land Use Element to allow for further evaluation of City gateways, their location and components, and to support the preparation of guidelines for private and public development to protect scenic resources in gateway areas (LU-1.A, LU-1.5).***

These revisions represent clarifications to policy text to further the General Plan objectives related to community character and visual setting. They do not result in any development or alterations to the land that is not already

contemplated by the new General Plan and considered by the General Plan EIR and therefore do not result in any new impact not considered by the FEIR.

11. ***Strengthen support for mitigation of tree removal in viewshed areas both during and after project development (LU-10.C).***

The revision to Implementation Program LU-10.C was done to improve the mitigating ability of the General Plan with respect to development impacts on viewshed and important vegetation and does not result in any new impact not considered by the FEIR.

12. ***Strengthen the language of various policies and programs in the Transportation Element to further support non-automobile modes of transportation (T-9.9, T-9.10, T-5.17, T-5.1, T-5.8).***

The revisions to the Transportation Element strengthen the mitigating ability of Policies and Programs related to alternative transportation modes and improve the City's commitment to address these needs. The revisions do not result in any new impact not considered by the FEIR.

13. ***Add policies and implementation language to the Transportation Element to strengthen/clarify certain traffic mitigations and to address the potentially significant impact related to regional traffic (Addenda #9 & #13, T-1.1, T-1.D, T-1.E, T-2.4, T-2.7).***

These additions to the Transportation Element improve the understanding of how the City will address certain traffic impacts and provide additional mitigation to address the potentially significant impact related to regional traffic. The revisions improve the mitigating ability of the General Plan but do not alter the environmental conclusions of the FEIR.

14. ***Revise certain policies and programs in the Land Use Element to protect neighborhoods from potentially harmful and incompatible uses (LU-4.C, LU-4.E, LU-4.D, LU-4.F).***

These revisions to implementation programs in the Land Use Element provide additional detail as to how the City intends to address concerns related to incompatible uses that potentially impact neighborhoods. The revisions clarify these implementation programs and do not result in any new impact not considered by the FEIR.

15. ***Add an implementation program to the Community Services Element that serves as a mitigation measure to reduce the level of significance for wastewater impacts to less than significant (Addendum #7 incorporated as Policy CS-10.3).***

This implementation program is added as a direct result of the CEQA review process and has already been included in the Revised Draft EIR pgs. 3.4-12 through 3.4-15. The conclusion after analysis in the EIR is that the addition of this mitigation measure would reduce the level of significance for wastewater impacts to less than significant.

16. ***Add an implementation program to the Community Services Element to provide mitigation to reduce the potentially significant drought year water supply impact identified in the RDEIR (Addendum # 6 incorporated as Policy CS-9.3).***

This implementation program is added as a direct result of the CEQA review process and has already been included in the Revised Draft EIR pgs. 3.4 – 6 through 3.4 -12. The conclusion after analysis in the EIR is that the addition of this mitigation measure should reduce the level of significance for water supply during drought to less than significant; however, due to the ultimate uncertainty in water supply, the impact is considered potentially significant. It should be noted that the City's allocation contract with the State Water Project is pending completion. This contract will secure additional reliable water supply for drought years and the requirement for Policy CS-9.3 as a mitigation measure will no longer be necessary.

17. ***Add policy language to the Natural Resource Element to address the potentially significant impacts to endangered species (RDEIR p. 14 - Response to Comment 49.3, Addendum #12, NR-2.4, NR-2.A, NR-2.B).***

This addition of Policies and Implementation Programs to the Natural Resource Element is a result of the CEQA review process and has been documented and made available for public review and comment as part of the RDEIR Response to Comments, Addendum #12, specified in public hearing notices and referenced in the staff report and topic Matrix for the Planning Commission and City Council. The Planning Commission specified incorporation of this revision in their June 26, 1998 formal recommendation to the City Council (Planning commission Resolutions 98-068-CQ and 98-068-GP). As described later in this addendum, revisions to the Final EIR have been adopted in order to recharacterize the potential environmental impact to endangered species where such impact might occur under all biological impact categories, as significant and unavoidable. While these policy revisions help to reduce the potential impact, as a theoretical matter, the potential for future impacts to rare, endangered and threatened species cannot avoided and the FEIR is revised to reflect this conclusion.

18. ***Place the RA-Resource Area designation on the Napa Oaks property (Pod 123). Information included in the General Plan EIR and in studies prepared for previous project applications show that this hillside property has serious constraints to development due to slopes, significant stands of vegetation, habitat, seismic risks, water supply and limited access. This hillside is an important viewshed for the City and is partially within the Carneros wine growing region.***

The City Council considered testimony from a number of concerned citizens and received several written communications detailing concerns over the impacts that could occur as a result of development of the Napa Oaks site as projected by the 1996 draft General Plan. Some of the comments were based on information obtained from studies and reports in City files #92-116 and #97-035. Comments included concern over known earthquake faults on the property, unstable slopes (evidenced by existing landslides in the area), erosion hazards, existing drainage problems and the existence of large groupings of oak trees and natural vegetation. An aerial photo was displayed to the City Council showing the edge of existing urban development and the hill top areas on the western boundary of the City which provide the contextual backdrop and viewshed for the City. The photo showed that Pod 123 was located in this viewshed area.

Based on the information presented and the detailed recommendation of the Planning Commission, the City Council determined that the land identified as Pod 123 in the General Plan had sufficient sensitivity to fall under the definition of the RA-Resource Area land use category as recommended by the Planning Commission. In considering the RA designation, the Council determined that 1 dwelling unit per 20 acres was a reasonable density given the fundamental resource protection purposes of the RA designation.

The decision to designate Pod 123 as RA is intended as an implementation of the resource conservation, open space, viewshed, and health and safety policies of the General Plan that serve as impact mitigations (See analysis under Item 4 above). The RA designation of Pod 123 further mitigates impacts identified in the RDEIR under Transportation, Community Services and Utilities (fire service, water supply above 300', storm drainage capacity), Visual Quality, Biological Resources, Geology/Soils & Seismicity, Hydrology and Public Health and Safety; and, is applied based on available and detailed information about the site on these topics. Based on this evidence, the designation, and the reasons for the designation do not constitute new information and are, in fact, a reasonable exercise of the City's discretion to apply appropriate land use designations in the interest of the community welfare.

Since the RA designation is an additional mitigation tool as discussed under Item 4 above, the application of this mitigation on Pod 123 further lessens impacts identified in the General Plan EIR under Transportation, Community Services & Utilities, Visual Quality, Biological Resources, Geology/Soils & Seismicity, Hydrology and Public Health and Safety. As such it is concluded that the RA designation of Pod 123 does not result in any new impacts not considered by the FEIR, and in fact improves the environmental circumstances related to the implementation of the General Plan.

Although the analysis above supports the conclusion that there are no new impacts, this Addendum also explains why the RA designation of Pod 123 does not result in the impacts identified by the prospective developer of this property,

which the City believes to be speculative, and would not normally be evaluated in a program level General Plan EIR. These include the question of whether environmental effects will result from a diversion of housing potential to other unknown sites in and around the City; whether the reduction in potential units for Pod 123 results in an overall reduction of units projected for the term of the General Plan (2020) and therefore affects the City's ability to meet its fair share of regional housing; and if there will be impacts resulting from unknown future agricultural activities on the site.

Potential, Impact of Diverted Housing Units

The decision to designate the Napa Oaks site (Pod 123) as RA-Resource Area does not necessarily result in a diversion of housing units to other areas in the City or County, thereby resulting in unknown impacts. Such a conclusion would be difficult to determine for the same reasons given in the analysis of Item 1 above (decision not to expand the RUL). The development numbers in the General Plan are theoretical and for long range planning purposes. The redesignation of Pod 123 to RA does not affect the numbers shown in Table 1-2 of the General Plan. For reasons stated under Item 1, the City will have adequate land for the projected dwelling units, and will be able to utilize previously constrained flat ground for this purpose (MU designated land in the flood project area). Even if the RA designation of Pod 123 results in an incentive to develop in other residentially designated areas of the City, the result would be environmentally beneficial since it is more efficient, desirable, and environmentally sound to develop units on flat land close to existing infrastructure than to excavate new land in natural hillside areas with the consequences of greater environmental impact and higher infrastructure costs.

It may appear from the 0-2 du/ac density range assigned to Pod 123 in the 1996 draft General Plan, that there is a potential reduction of approximately 80 units; however, it should be recognized that the lower end of that range is zero. It should also be understood that the City's Hillside Overlay Zoning District has been, and will continue to be, applied to the property. The Hillside Overlay Zone is assigned to certain properties in the City in order to ensure the preservation of these hills and ridgelines for scenic purposes, to protect natural features and to protect the public health and safety (Chapter 17.54, Napa Municipal Code "Zoning Ordinance"). The Hillside Overlay Zone allows only one dwelling unit per parcel and requires approval of a conditional use permit for any additional units, regardless of the underlying zoning. Therefore, regardless of the density range that the General Plan might apply to the property, the City would still retain discretion to limit development to no more than one unit per property. The purpose of this discretionary review is to allow consideration of development impacts in these sensitive areas.

For the same reasons cited in the discussion under Item 1 above, there is no reason to believe that the RA designation of Pod 123 will cause housing development at unspecified locations outside the RUL. Since this assumption is speculative, any conclusion regarding specific environmental impacts is also difficult to determine.

Fair Share Housing Objectives

The decision to designate the Napa Oaks site (Pod 123) as RA-Resource Area does not affect the City's ability to meet the fair share regional housing requirements and the objectives of the Housing Element. Although this is not necessarily an environmental issue, the City has determined that, for the same reasons discussed under Items 1 and 4 above, the RA designation of Pod 123 does not result in an overall reduction of units projected for the term of the General Plan (2020) and therefore does not affect the City's ability to meet its fair share of regional housing. It should be noted that the 80 dwelling units on view lots overlooking the Napa Valley are sufficiently rare and desirable and would not be available to the mid or lower end of the housing market; that the market incentive to build such units will remain high; and that the same market driven forces will cause other sites to be desirable for high end units to meet the needs of the community. On the other hand, lower end units are the least likely to be provided by the development community and, for this reason, the primary focus of the policies and programs of the Housing Element is to support the development of such units. As stated above, these units are more efficiently developed on flat ground near existing infrastructure, and previously constrained land in flood prone areas will soon be available for additional dwelling units at up to 40 units per acre. If the RA designation is applied in the future to other properties in the RUL, it will be due to constraints existing on these properties which warrant the imposition of special standards. If future properties are determined to have the characteristics to qualify for the RA designation, it is not likely that these same properties would be candidates for the development of a significant number of fair share housing units. For these

reasons, the RA designation of Pod 123, or any other highly sensitive property in the RUL, will not affect the City's ability to meet its fair share housing goals.

As stated under Item 1 above, the City will be updating its Housing Element by 2001 based on the most recent information available, including an updated fair share projection for ABAG. The fair share used in the existing, certified Housing Element is based on ABAG information from 1990.

Agricultural Impacts

The RA designation of Pod 123 does not mandate an agricultural use of the property that will result in impacts to neighboring residential uses. The City has never considered agricultural use as a primary use of land within the RUL (this would conflict with fundamental RUL policies). The RA designation does not encourage agricultural use, but is instead intended to address resource and hazard protection concerns and to further visual and open space goals. The additional RA implementation programs under Goal LU-10 of the Policy Document change the current treatment of agricultural use by requiring changes to the Zoning Ordinance that make agricultural uses subject to a use permit, resulting in a case by case review of potential impacts in the same way that any "development" would be reviewed under the RA designation (See discussion under Item 4 above). In addition, the Zoning Ordinance imposes regulations for agricultural uses in the RUL in Section 17.10.060 (standards and requirements for uses in the AR District), Section 17.80 (requirements for stream bank stabilization and erosion control, also applying a buffer requirement), Section 17.60.030 (specific regulations for erosion hazard areas), Section 17.60.090 (regulations to minimize conflicts between agricultural and urban residential uses, including setbacks, buffers, recorded notices and restrictions/protections from noise and other impacts associated with agriculture). The City would apply these requirements during discretionary review of a future agricultural use within the RUL as conditions of approval.

In conclusion, the City Council's action of designating Pod 123 (Napa Oaks) as RA has resulted in a more environmentally superior General Plan than was originally proposed in the 1996 draft and does not create any new significant effects, or substantially worsen any previously-identified environmental impacts disclosed in the FEIR.

*19. **Emphasize the need to continue to monitor, study and update the transportation policies and implementation programs to address traffic impacts associated with ongoing development (T-1.G).***

This addition to the Transportation Element clarifies the City's intent to continue evaluating and planning transportation solutions and to update the General Plan as necessary to address current transportation issues. The revision does not result in any new impact not considered by the FEIR.

TEXT REVISIONS TO THE FINAL EIR

The City does not consider the information in these revisions to the FEIR as "new information" and has not received any new information calling into question the original impact conclusion of the DEIR. However, during consideration of the RDEIR, staff recommended Addendum #12 to the Planning Commission which called for a recharacterization of the impact to endangered species as significant and proposed additional policies and implementation programs to address the matter and lessen the impact. However, it was determined, as a theoretical matter, that the proposed General Plan policies cannot guarantee the avoidance of all adverse effects on listed species and, as a result, the impact has been recharacterized as significant and unavoidable. Also addressed by this conclusion are the sensitive salt marsh species identified on page 3.7-8 of the RDEIR that may be impacted by future development enabled by the Plan.

Text revisions to the Final EIR are limited to those revisions necessary to recharacterize the potential environmental impact to endangered species as significant and unavoidable (as specified in RDEIR Response to Comment 49.3 and Addendum #12 released 4/24/98).

The following pages of the RDEIR have been revised using double underline and double strike-out text to indicate the Final EIR text change:

APPENDIX E

Page S-4

In the summary chapter, under the "Significant Unavoidable Impacts" section, a fourth significant impact is added as follows:

4. There may be impacts to endangered species and habitat caused by future development enabled by the General Plan. (Significant)

Pages S-10 – S-23

The entire "Summary of Impacts and Mitigation Measures" Table S-1, has been revised and replaced to accurately reflect the impacts, mitigations and significance conclusions adopted with the Final EIR in December 1998. The sole revision to this table is on page S-18, endangered species impacts.

Page 3.7-7 and 3.7-8

Under Biological Resources, the "Significance Criteria" have been revised to reflect the Mandatory Findings found under Section 15065 of the CEQA Guidelines. Under impact # 1, the potential impact to rare and endangered plant and/or animal species has been revised to be significant and unavoidable. Discussion has been added to describe this conclusion and to include references to additional policies added to the General Plan that further mitigation efforts in this category.

Page 4-1

Under the section "Unavoidable Adverse Impacts" a fourth significant impact is added as follows:

4. There may be impacts to endangered species and habitat caused by future development enabled by the General Plan. (Significant)

Exhibit A

To

Addendum to FEIR

City of Napa General Plan
Envision Napa 2020

*

1996 Study Memo to File by Planning Staff
Comparison of 1991 Housing Element and 1996 draft General Plan Housing Potential Estimates

APPENDIX E

APPENDIX E

COMPARISON OF 1991 HOUSING ELEMENT AND 1996 GENERAL PLAN HOUSING POTENTIAL ESTIMATES

This memo describes how the land use designations and development potential reflected in the 1996 General Plan will continue to support the housing development potential estimates of the 1991, HCD certified housing element.

1991 Housing Element Residential Potential vs. 1996 General Plan

Table 1-2 pg 1-6 of Policy Doc Draft.

Napa's 1991Housing Element (Table 10, p. 23) estimates a potential for additional residential development from 5,613 (low) to **8,762** (mid-range) units. The low estimate assumes development occurs at minimum densities allowed by Zoning, and the mid-range assumes development occurs at approx. the midpoint of the densities allowed by Zoning. **Table ~~LU3~~** in the 1996 General Plan projects that the plan will provide for **7,840** new residential units. In order to compare the two development potential figures, adjustments need to be made to account for different time frames and assumptions When these adjustments are made, the end result is that the new General Plan does not compromise the City's ability to satisfy the residential potential estimates in the certified Housing Element.

Housing Element residential potential adjusted total: **7,655 units**

General Plan residential potential adjusted total: **7,840 units**

Adjustments / Updates to '91 Housing Element Totals

Finaled Building Permits Subtracted

In order to compare the 1991 housing potential estimates with the development potential estimates for the 1996 Land Use Element the 1991 figures were adjusted to reflect residential development that had occurred (finaled building permits) up to March 1992, which is the date of the data base used for the 1996 Land Use Element. Since the Housing Element uses a 1989 base, units built in 1989, 1990, 1991, and January through March 1992 were subtracted from the Table 10 totals (total of 1007 finaled building permits were subtracted from the 6/89 total of 9380). This results in an updated mid -range potential of **8,373 units**. The distribution of building permit types is shown in the background calculations on page 3.

Density Bonus Assumptions Removed

It should be noted that the 8,373 unit total includes **346 units** consisting of density bonus units in the medium density category (3% of the acres) and the high density category (13% of acres assumed to be developed at 50 units/acre) according to the following calculations:

Medium Density Acreage	616.5 x .03 = 18.5 acres 18.5 x 8.5 (mid range)= 157.25 units 157.25 x .25 (db) = **39 additional units assumed**
High Density Acreage	73.6 x .13 = 9.6 acres 9.6 x 18 (mid range) =172.8 9.6 x 50 (Special Res. Pol.) = 480 480 - 172.8 = **307 additional units assumed**

Total Density Bonus Units Assumed in '91 Housing Element: **346 dwelling units**

Since the General Plan housing unit potential estimates don't assume density bonus units, these 346 units have been subtracted from the Housing Element total, resulting in an adjusted '91 Housing Element total of **8,027 units** as of March '92.

Environmental Constraints Considered

In estimating development potential, the new General Plan deducted acreage that was determined to be unavailable for development due to environmental constraints. This was evaluated on a parcel by parcel basis and the resulting unit loss was included in the new General Plan capacity tables. The total units determined to be lost by environmental constraints is **371 units**. The 1991 Housing Element did not assume any units lost to environmental constraints, since a parcel level analysis had not been done at the time. It should be noted that these environmental constraints are a result of Natural Resource and Safety Policies in the 1991 General Plan and in the new General Plan. In order to provide a balanced assumption regarding environmental constraints, the 371 units, by housing type, have been subtracted from the totals in the 1991 Housing Element for comparison purposes.

When the 371 environmental constraint units are subtracted from the 8,027 adjusted total, it leaves an adjusted balance of **7,655 units** as of March '92 for comparison purposes.

The 1996 General Plan Residential Development Potential

The new General Plan estimates a potential of **7,840 units** based on the March 1992 conditions (date of download from database). Since the description of residential types is different from that used in the Housing Element, a direct "crosswalk" was not possible. Instead, new General Plan residential types were grouped according to similarities in type of development which generally result in the same density ranges as the types listed in the Housing Element. The resulting distribution can be seen in the attached table.

The SFR residential designation in the '96 General Plan is considered low density and represents a density from 1 to 9 units per acre depending on location and pod character. For comparison purposes, this is considered roughly equivalent to the combined ER and LR designations of the '91 Housing Element which have an overall density range from 1 to 6 units per acre. The medium density designations of the '96 General Plan are considered to be the SFI and TRI residential designations which generally range from 3 to 10 dwelling units per acre depending on pod location and neighborhood character. The '91 Housing Element identifies the MR designation for medium density residential with a range of 6 to 12 dwelling units per acre. The high density residential in the '96 General Plan is provided in the MFR pods, along with provision for high density residential development in the DC (Downtown Commercial) and MU (Mixed Use) pods, all with a potential density range from 10 to 40 units per acre depending on pod location. The HR designation in the '91 Housing Element represented a range from 12 to 25 units per acre and did not provide for any residential development in the areas where the DC and MU pods are located.

The following items should be noted regarding the General Plan dwelling unit total:

Additional RUL Land / Development Potential

The General Plan adds acreage into the RUL in three locations. Of these, PODs 29 and 30 represent new acreage with a residential potential of 268 additional units. These units are included in the 7,840 unit General Plan total. The DU capacity of this acreage was not considered in the '91 Housing Element; however, it has not been subtracted from the '96 General Plan total because it has been included in the calculations for future capacity and supports the 7,840 unit total.

Distribution of Dwelling Units by Type

The attached table and background calculations provide a comparison of the unit distribution by residential type for the '91 Housing Element and the '96 General Plan. The General Plan attempts to resolve the policy "tension" between the need to provide housing and the need to preserve neighborhood character by redistributing some of the medium density units into the low density and high density categories. In addition, the new plan allows for high density residential development in the Downtown Commercial and Mixed Use Categories on land that was not previously available for residential development.

Background Calculations

'91 Housing Element (Table 10)	'96 General Plan
Low Density (18.3 %)	Low Density (39.5 %)
584 ER	
1752 LR	
2336 as of 6/89	3102 SFR
-686 Bldg Permits Finaled 6/89 - 3/92	
1650 Adjusted Low Density Units	
- 251 Env. Constraint Units	
1399 Adjusted Low Density Units	**3102 Low Density Units**
Medium Density (61.4 %)	Medium Density (26.5 %)
5132 MR as of 6/89	
- 303 Bldg Permits Finaled 6/89 - 3/92	2044 SFI
4829	37 TRI
- 39 Density Bonus Units	2081
4790	
- 87 Env. Constraint Units	
4703 Adjusted Medium Density Units	**2081 Medium Density Units**
High Density (20.3 %)	High Density (34.0 %)
	2318 MFR
1911 HR as of 6/89	11 DC
- 18 Bldg Permits Finaled	+ 328 MU
1893	2657
- 307 Density Bonus Units	
1586 Adjusted High Density Units	
- 33 Env. Constraint Units	
1553 Adjusted High Density Units	**2657 High Density Units**
7655 Total Units '91 Housing Elem.	**7840 Total Units '96 Gen. Plan**

APPENDIX E

PROVISION OF RESIDENTIAL UNITS
'91 Housing Element vs. '96 General Plan

91 Housing Element (1)		Units	96 General Plan (2)		Units
ER & Low Den	**18.3 %**	**1399**	**SFR**	**39.5 %**	**3102**
Medium Den	**61.4 %**	**4703**	**SFI & TRI**	**26.5 %**	**2081**
High Den	**20.3 %**	**1553**	**MFR, DC & MU**	**34.0 %**	**2657**
	100%	**7655**		**100%**	**7840**

City of Napa
Planning Department
6/6/96

CITY OF NAPA GENERAL PLAN

Final EIR Text

Consisting of the 12/8/97 Revised Draft EIR with revisions as described in the Addendum to the FEIR.

December 1, 1998

APPENDIX E

Preface
Revised Draft EIR

This is a revision to the Draft EIR prepared for the City of Napa Draft General Plan and originally released for public review in October 1996. As a result of extensive comments on the first Draft EIR, the City has prepared a comprehensive set of responses and has revised certain sections of the DEIR in order to more accurately reflect the discussion of details in the Response Document and to incorporate changes to the project description contained in Addenda which have been prepared for the Draft General Plan. This Revised Draft EIR (RDEIR), along with the Response to Comment Document and General Plan Addenda, is recirculated for public review pursuant to Section 15088.5 of the State CEQA Guidelines. The Response to Comments Document is considered a part of this Revised DEIR and is included by reference. The Addenda to the General Plan Policy Document recommend changes to the Policy Document to improve accuracy and enhance the mitigating ability of certain policies. In order to avoid the confusion and the sense of a "moving target" that could result from revisions to the Draft General Plan Document, the draft document has been left unchanged and in the form of its August 1996 release. Recommended changes to the Policy Document are described under specific subject headings in the Addenda. Although the Revised DEIR, the Response to Comments and the Addenda have been bound separately, the information is interconnected and the documents should be read in concert. All three documents have been circulated and made available simultaneously for public review along with the Draft General Plan Documents originally released in 1996.

Please contact the City of Napa Planning Department, 1600 First Street, Napa, CA -- (707) 257-9530, if you wish to obtain any of the documents described above.

APPENDIX E

Summary

The City of Napa has prepared a General Plan Update (Draft General Plan) that will provide policy guidance and implementation strategies to meet the long-term planning needs of the City. The Draft General Plan, called *Envision Napa 2020,* is a comprehensive update of the 1982 General Plan (last updated in 1986) and consists of two documents: the Draft Policy Document and the Draft Background Report. The Draft Policy Document features goals, policies, and implementation programs for each of the General Plan elements and will serve as the City's "blueprint for growth" as it develops over the next 25 years. The Draft Background Report contains information on existing conditions for each of the General Plan elements and provides an understanding and basis for the policies and programs presented in the Draft Policy Document, as well as the documentation required of a general plan by State planning law.

The City of Napa is the designated lead agency responsible for California Environmental Quality Act (CEQA) review for the General Plan Update. The Draft EIR was written pursuant to CEQA.

S1. Project Location

The City of Napa is located along the Napa River in the southern portion of the Napa Valley, 52 miles northeast of San Francisco and 61 miles southwest of Sacramento. Most of the City is on relatively level terrain, except the eastern and western edges which extend into brush and oak-covered foothills. The City abuts agricultural lands, predominantly vineyards, to the north. To the south lie agricultural and marsh lands and the Napa County Airport. Regional access to Napa is primarily via State Highways 12, 29, 121, 128, and 221 which connect with interstates to the south and north.

S2. General Plan Process

The General Plan Update process began in 1991 with the appointment of a Citizen Advisory Committee. (CAC). The CAC was charged with an extensive review of issues affecting future growth and change and formulating a vision for Napa's future based on the central themes, or objectives, identified by the group. The impetus for the General Plan Update was rooted in the difficulties of implementing the 1982 General Plan. That Plan called for the continued protection of the area's agricultural resources by managing growth and encouraging higher density infill onto vacant or underutilized parcels within existing developed areas. While the fundamental goals of protecting agricultural resources and controlling the rate of development were sound and valid, the strategy of infill development created significant controversy as proposals to construct attached housing in predominantly single family neighborhoods triggered strong local opposition. In addition, portions of the City's older, historic housing stock and neighborhoods were facing increased development pressure as property owners and developers sought to take advantage of the higher densities allowed.

In response to this problem and a growing influence by state and federal requirements in local, long-range planning, the CAC spent considerable time examining the issues that affect the rate, amount, type, and quality of development within Napa. What emerged from this process was agreement that Napa's existing livability and future are linked to:

- maintaining a small-town atmosphere that enhances the residential character of existing neighborhoods;
- encouraging new development to respect the character and form of existing neighborhoods and commercial areas;
- promoting a sustainable economy that offers a level of goods, services, and jobs sufficient to support a community the size of Napa; and
- creating a balanced community where people have opportunities to both live and work.

What also emerged from the CAC's deliberations was reaffirmation of the importance of the Rural Urban Limit (RUL) as a strong tool to contain the extent of urban development and to preserve the surrounding agricultural, scenic, and open space resources.

To accommodate the projected growth within the boundaries of the RUL and avoid the land use conflicts created by the infill strategy of the 1982 General Plan, the Draft General Plan requires new development to conform to a few defining neighborhood characteristics and to be within a specified density range that is similar to that of existing development. To reduce commuting patterns that show a growing number of Napa residents working outside the City, the Draft General Plan places priority on attracting higher paying technical and professional jobs and on providing affordable housing to accommodate retail and service workers who will make up the majority of the City's future new employees. These key ideas were documented in a paper called the *Concept Report* in the spring of 1994.

Review and comment on the Concept Report by the public and by the City Council provided the direction needed to compile the Draft General Plan. Further details on the principle themes, policies, implementation programs are presented below and in Chapter 2 of this document.

S3. Overview to the Project

Project Objectives

The goals of the Draft General Plan were derived from seven central planning themes, or objectives, identified during the City's two-year community outreach process. The major objectives of the General Plan are maintaining the physical and social qualities of Napa within an economically healthy and self-sufficient community. The seven planning objectives identified include:

1. Contain growth within the Rural Urban Limit Line.
2. Conserve the character of existing neighborhoods.
3. Improve the City's jobs/housing balance.
4. Recognize the fragility of Napa's precious natural resources and focus protection on wetlands, other scarce habitats, hillsides and agricultural lands adjacent to but outside the RUL.
5. Promote a sustainable economy: a healthy economy with jobs that "fit" the needs of residents.
6. Maintain a vital and healthy Downtown.

7. Consider the environmental and financial costs of flood control along the Napa River and encourage appropriate development.

Key Project Goals and Implementation Strategies

The Draft General Plan's goals are based on goal statements developed by the groups and individuals who participated in the General Plan update visioning process. The Draft General Plan is also based in part on a three part growth management strategy featuring:

- a *confined city policy* implemented through continued reliance on the Rural Urban Limit (RUL);
- a *context sensitive residential development policy* aimed at preserving the physical aspects of "neighborhood character." This approach could best be implemented through adoption of residential design guidelines; and
- a *development pacing or staging system* to ensure the rate of growth does not exhaust the City's remaining residential land supply before the end of the planning period (i.e., 2020).

A "confined city" strategy (i.e., planning for only as much population and employment as can be comfortably accommodated within the 18.2-square-mile RUL) would ensure the City retains a defined urban area surrounded by a permanent greenbelt of open space.

Self-Mitigating Policies

The Draft General Plan has been designed to be a self-mitigating plan, that is, the plan promotes a land use pattern and contains policy statements to mitigate environmental impacts that might otherwise be expected with growth and land development. Potential limitations to development, which were identified in the Background Report, include sensitive biological resources, prime agricultural soils, geotechnical hazards, excessive noise exposure areas, and flood/inundation areas. Policies to mitigate these development constraints address preserving Napa's natural resources, protecting the public and property from natural and man-made hazards, and attaining desired service levels. These mitigation policies apply regardless of the land use alternative ultimately selected. In this EIR, these policies are acknowledged as mitigation measures included in the proposed project, and, as part of the project, would serve to help avoid potential impacts.

Growth Forecasts for the Year 2020

Based on the residential capacity analysis method developed by the CAC, the total population was estimated to be 69,640 in 1995. Under the Draft General Plan, a total of 34,938 dwelling units at buildout (in the year 2020) could potentially be accommodated in the RUL, or 7,840 units above current residential development levels of 27,098 dwelling units. The additional residential development would accommodate a total population of approximately 81,100. Additional commercial/industrial development in the RUL would support approximately 14,000 jobs, for a total of 42,720 jobs by the year 2020.

S4. ENVIRONMENTAL CONCERNS

Significant Impacts

The City in developing the General Plan has made a conscious effort to mitigate potential environmental impacts by anticipating them and then developing policies to avoid their occurrence. For example, most general plans in California establish rather broad density ranges for individual land use classifications. Because of the potential for land use conflicts between existing development and new development, the City has crafted a set of residential typologies and a narrower range of permitted densities as a means of avoiding the incompatibility impacts. As a result of this effort, plus implementation of the City's Policy Resolution No. 27 which calls for a standard set of mitigation measures to be applied to each project in Napa, the impacts that might otherwise occur will be precluded. The specific policies, implementation programs, and provisions of Policy Resolution No. 27 that serve to mitigate potential impacts are identified in Table S-1 (located at the end of this Summary) and described in Chapter 3 of this document.

In reviewing Table S-1, it should be noted that no mitigation measures are identified for beneficial effects. For significant impacts, appropriate policies and implementation programs from the proposed project that serve as mitigation measures are identified along with other necessary recommendations. For insignificant impacts, the relevant policies and implementation programs that enable the impact to be classified insignificant are identified. Policies are identified by a letter prefix that is an abbreviation for a section from the Draft General Plan and a numerical suffix that corresponds to the specific policy number in the Draft Plan. Thus, HR-1.1 stands for Historic Resources, Policy 1.1; LU-4.3 stands for Land Use, Policy 4.3; NR-2.9 stands for Natural Resources, Policy 2.9. The convention for identifying implementation programs from the Draft General Plan is a letter prefix, followed by a number/letter combination (e.g., LU-2.D).

Significant Unavoidable Impacts

~~Based on the self-mitigating nature of the Draft General Plan and the implementation of Policy Resolution No. 27, there are no significant unavoidable impacts anticipated from adoption and implementation of the Napa General Plan.~~

The environmental analysis in Chapter 3 concludes that certain impacts resulting from adoption and implementation of the new General Plan may be significant or potentially significant in ~~three~~ four areas.

1. Prime agricultural soils within the City's RUL would be converted to urban uses. (Significant)
2. The SR 221 - SR 29 intersection would continue to operate at Level of Service F, largely due to cross-county traffic between Solano and Sonoma Counties (Significant). In addition, uncertainty of funding for transportation improvements and city trips that impact roadways outside the city limits may create potentially significant impacts. (Potentially Significant)
3. Water demand could exceed the City of Napa's water supply during drought years. (Potentially Significant)
4. There may be impacts to endangered species and habitat caused by future development enabled by the General Plan. (Significant) *(Text Revision for 12/98 FEIR -- Double Underline / Strikethrough)*

Conversion of prime agricultural soils within the RUL to urban uses is an unavoidable impact if these lands are designated for urban development. The only mitigation for this impact is to exclude the lands with prime agricultural soils from the RUL or to designate the lands for agricultural or open space use. The feasibility of this option is unlikely since the majority of lands within the historic City boundaries consist of agricultural soils.

The continuing congestion at the SR 221 - SR 29 intersection is unavoidable from the City's perspective since the condition is largely due to cross-county traffic between Solano and Sonoma Counties, which is beyond the control of the City of Napa.

S5. Areas of Controversy/Issues to Be Resolved

As a result of the community outreach process and review of interim reports such as the *Concept Report*, there remain several areas of controversy or issues that still need to be resolved. Some of these issues will be debated during the upcoming public hearings on the Draft General Plan and Draft EIR before the Planning Commission and the City Council; resolution of others depends on processes outside this General Plan Update effort. These areas are summarized below.

- Flooding along the Napa River has historically been an issue and became a focus for planning efforts again after the major flood in 1986. The U.S. Army Corps of Engineers has been developing a flood control project that would eliminate flood hazards in the central portion of the City and make more intensive development a possibility. At the time of the Draft General Plan preparation, it was not clear whether the flood control project could be constructed at an acceptable cost.

- In order to accommodate new development and protect existing neighborhoods, the RUL is proposed to be extended in ~~three~~ four locations. The expansion area west of Foster Road would permit residential development on hillsides that may pose geotechnical, fire hazard, erosion, and community service concerns. The area to the northeast of Big Ranch Road and Trancas Street is partially developed as a rural residential area, whose character would change with the proposed urbanization of the area. The third area encompasses the already developed Napa State Hospital environs. The fourth area on the northeast corner of Silverado Trail and Trancas Street consists of a 5 acre parcel that has legally been part of the City since 1973. The fiscal and environmental implications of adding these areas to the RUL will be a topic of discussion during the upcoming hearings.

- One of the chief reasons that implementation of the 1982 General Plan was difficult was the land use conflicts created by the infill strategy. Nevertheless, there are still members of the community who feel that the strategy of encouraging higher densities is appropriate. With a limited supply of land because of the retention of the existing RUL boundaries, the City must allow higher densities to accommodate the projected population.

- The growth management strategy included as part of the Draft General Plan will moderate the rate of development, enabling community service providers and utilities time to implement mechanisms or make improvements to assure that supply of public facilities and services is commensurate with demand. However, the reduced pace of development also slows the payment of fees and tax revenues that are often necessary to finance public improvements.

S6. ALTERNATIVES TO THE PROJECT

This section describes alternatives to the proposed project. CEQA requires that reasonable alternatives that can feasibly attain the basic objectives of the project be considered. The purpose of this mandate is to provide the decision-makers with an opportunity to evaluate the comparative merits of the alternatives. The discussion of alternatives must indicate whether an alternative has been rejected from further consideration and, if so, why it was rejected.

CEQA does not require that an EIR present all possible alternatives nor does it prescribe a fixed number that must be considered. It does require that the EIR address the "No Project" alternative, discuss enough alternatives to illuminate and highlight the most important impacts, and formulate alternatives to reduce significant impacts. The alternatives that this section of the EIR considers in detail are discussed in Chapter 5. They have been selected from others also described in that chapter to fulfill the foregoing purpose.

The City has completed nearly six years of planning study, during which a number of alternatives and ideas have been advanced and evaluated. These alternatives are described in the City's *Futures Report* (January 1990). As the planning program has evolved, the most viable alternatives are those that share the same fundamental objectives (please refer to the objectives enumerated in Section S3 of this Summary) that have served to guide the formulation of policies articulated by the Draft Policy Document.

The alternatives identified below have been evaluated for their environmental effects, as well as their ability to satisfy the project objectives.

Five different alternatives have been defined for this EIR. They include:

- **No Project Alternative** - an option based on the policies and land use designations contained in the 1982 General Plan;
- **Reduced Growth Alternative 1** - an option that assumes that further growth in Napa does not occur, with the exception of already permitted development;
- **Reduced Growth Alternative 2** - an option that would decrease the permitted densities of each residential land use designation by approximately 25 percent; and
- **Reduced Growth Alternative 3** - an option that would decrease the development potential within the RUL line by about 17 percent by selectively reducing densities on vacant and underutilized properties near the RUL line.
- **Expanded RUL Alternative** - an option that increases the size of the RUL to accommodate the projected growth in areas that have been the subject of past annexation inquiries or discussions by City Councils. The expansion areas include lands that are currently served by the City Water Department and the Napa Sanitation District.

The Expanded RUL Alternative is described partly in order to compare the relative impacts that would result if the existing RUL were not preserved.

No Project Alternative

The No Project Alternative would retain the policies and implementation strategies of the 1982 General Plan as it has been amended (i.e., State-mandated updates to the Housing Element and the adoption of the Parks and Recreation Element). The No Project Alternative would permit a greater development potential than is currently envisioned by the Draft Policy Document. The number of units permitted under the No Project Alternative would be approximately 1,000 units more than the proposed project. The No Project Alternative also anticipates 800,000 square feet more commercial and industrial square footage.

This alternative would fail to address the concerns that precipitated this General Plan Update; namely, inability to protect the City's residential neighborhoods and their character. Moreover, the No Project Alternative would inadequately account for new state and federal requirements that affect the City's long-range physical development. On a citywide basis, the No Project Alternative would pose greater "population-driven" impacts, i.e., traffic, air quality, noise, and community services, than the proposed project. In addition, the following additional adverse effects are associated with the No Project Alternative:

- retention of the relatively high densities near the RUL line would mean continued conflicts at the agricultural/urban interface;
- unacceptable congestion at ten key intersections in 2020;
- localized congestion due to incomplete street networks; and
- continued pressures to redevelop older areas with historic buildings.

Because this alternative does not reduce significant effects of the proposed project and fails to satisfy fundamental objectives established for the planning program (i.e., protection of neighborhood character and historic preservation), the No Project Alternative is not a practical alternative for the City to pursue.

Reduced Growth Alternative 1: No Growth

The No Growth Alternative assumes that further growth in Napa does not occur, with the exception of already permitted development. Under this "no build" alternative, the policies and procedures of the existing 1982 General Plan would govern the physical development of the City. As defined, this alternative satisfies legal interpretations of CEQA that one alternative must describe maintenance of the existing environment as a basis for comparison of the suggested alternatives to the status quo.

This alternative would maintain the existing number of housing units at 27,100, or 7,800 fewer dwelling units than would be allowed under the proposed project. Existing commercial and industrial square footage would remain at about 7 million, or 3.2 million less than under the proposed project.

Under the No Growth Alternative, loss of existing small, random parcels of agriculture within the RUL would not occur, signalized intersections that are projected to deteriorate to unacceptable levels would continue to operate acceptably, and residential areas that are projected to experience increased sound levels would continue to enjoy acceptable ambient conditions. Because this alternative would not result in any new residential development, there would be no adverse impact to community services or utilities.

From a practical standpoint, there are few feasible ways of implementing this alternative. One approach would be to impose a long-term moratorium on growth. However, this alternative would preclude the City's ability to satisfy the objectives of the General Plan. In particular, the No Growth Alternative would severely limit economic development, would not support the City's goal to satisfy its fair share of regional housing demand, and would improve the City's job/housing ratio. For these reasons, it is rejected as a practical alternative.

Reduced Growth Alternative 2: Decrease Housing City-Wide

The Reduced Growth Alternative 2 recognizes that neighborhood character and stability were threatened by the 1982 General Plan policy of encouraging of higher density infill development. Reduced Growth Alternative 2 would decrease the permitted densities of each residential land use designation by about 25 percent. As a result, the projected buildout under this scenario would be a population of approximately 67,300 to 78,300, or 2,800 to 13,800 fewer persons than under the proposed project. Commercial and industrial development would be expected to occur similar to that planned for under the proposed project.

Under Reduced Growth Alternative 2, trip generation, air emissions, noise, and community service demands would all be reduced to a limited extent. The reduction is moderated by commercial and industrial development which would remain comparable to the proposed project. As conceived, this alternative does not include the urban design considerations of the land use designations proposed by the Draft General Plan. Thus, while Reduced Growth Alternative 2 would eliminate the pressures to redevelop infill areas at higher densities, it does not function as well as the proposed project at preserving the character, pattern, and typology of existing residential development. An across-the-board reduction in residential densities as recommended by this alternative would be contrary to the City's objectives of promoting affordable housing and may frustrate efforts to satisfy regional fair share housing requirements.

Because this alternative does not provide any compelling benefits relative to the proposed project (that is, a clear reduction in the number and magnitude of significant effects identified for the proposed project), creates greater impacts in certain areas, and would be less successful at protecting neighborhood character than the proposed project, Reduced Growth Alternative 2, while viable, is inferior to the proposed project.

Reduced Growth Alternative 3: Selective Decrease in Housing

This alternative recognizes that the City needs to protect open space surrounding the City, reduce development pressures on the outlying areas, and minimize potential conflicts between residential development and agricultural operations. Reduced Growth Alternative 3 would decrease the development potential in the RUL line by approximately 17 percent, by selectively reducing densities on vacant and underutilized properties near the RUL line. As a result, the projected buildout under this scenario would be a population of about 69,300 to 78,800, or 2,300 to 11,800 fewer persons than under the proposed project. Commercial and industrial development would occur similar to that planned for under the proposed project.

Reduced Growth Alternative 3 would minimize the adverse effects identified for the proposed project that relate to population. Trip generation, air emissions, noise, and community service demands would all be reduced to a limited extent, but less so than for Reduced Growth Alternative 2. The reduction is

further moderated because commercial and industrial development would remain comparable to the proposed project.

This alternative does not propose to reduce permitted densities in the residential land use designations. As a result, the same problems that exist with the 1982 General Plan persist: infill development that (1) need not conform to the existing character, pattern, and density of residential development, (2) undermines neighborhood stability, and (3) creates pressures to redevelop older areas with historic buildings.

Expanded RUL Alternative

The Expanded RUL Alternative would "round off" the RUL by including areas that have been the subject of previous annexation inquiries or water and sewer service connection requests. Adding 4,000 acres to the City's RUL would increase the City's buildout population in 2020 to about 101,000, or 19 percent greater than envisioned by the Draft General Plan. The expanded areas would essentially enlarge the RUL in all directions but especially into Congress Valley, Soscol Ridge, Coombsville, and Silverado.

The Expanded RUL Alternative would result in several significant effects that would not occur with the proposed project, because of the increased population and the enlarged physical extent of the City. These impacts include:

- extension of development into areas beyond the desired emergency response time for police and fire services;
- uncertain adequacy in water supply and wastewater treatment capacity;
- encroachment into and conversion of productive agricultural lands;
- increased development on hillsides and grasslands, creating greater risks of fire hazard, geotechnical problems, and disturbance to sensitive biological resources;
- nonconformance with City, County, and the Local Agency Formation Commission objectives regarding preservation of the natural environment to the maximum extent possible; and
- accommodation of a growth rate and buildout population that would be considered excessive for the planning horizon.

Because the Expanded RUL Alternative would result in significant environmental impacts not predicted for the proposed project and would not fulfill the General Plan objectives, this alternative is rejected.

Environmentally Superior Alternative

Based on the alternatives considered and evaluated, the proposed project would be the alternative that best reduces environmental impacts and satisfies the community objectives. The Draft General Plan is therefore considered the environmentally superior alternative.

Impacts	Mitigation Measures	Level of Significance After Mitigation
Land Use		
1. Future development in Napa would be compatible with existing development within the RUL. In addition, some existing development that is incompatible with surrounding uses would be replaced or would be required to meet applicable standards to ensure its consistency with nearby uses. (B)	NR	B
2. The continued support and maintenance of the RUL to define the City's urban growth boundaries would minimize disturbance to the region's rich natural resources. (B)	NR	B
3. Under the proposed project, the RUL would be expanded by approximately 440 acres. The majority of the new land to be included in the RUL is already urbanized (more than 400 acres) and the remaining portion is vacant or underutilized. Therefore, the project would not induce sprawl or the premature conversion of agricultural land. (I)	Expand the RUL in a manner that complies with the environmental protection and growth management guidelines consistent with City and County goals. (A-2.1)	I
4. Development associated with the Draft General Plan would result in the conversion of existing agricultural uses and prime soils within the City's RUL to urban uses. (S)		S
5. The proposed land uses would accommodate a household population and workforce generally consistent with regional growth projections. (I)	NR	I
6. The Draft General Plan would generally be consistent with and reinforce the adopted environmental plans and goals of other local and regional jurisdictions. (B)	NR	B

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Page 46 of 688

APPENDIX E

Impacts	Mitigation Measures	Level of Significance After Mitigation
Transportation		
1. Traffic associated with development permitted by the Napa General Plan would be adequately mitigated by the policies and programs included in the Draft General Plan, except for the intersection of SR 221 and SR 29. (S)	Implement major road improvements identified in Table 3.3-3 (please refer to Section 3.3, Transportation). (T-1.3) Pursue federal and state funding for roadway construction. (T-1.7) Correct discontinuous arterial or collector streets. (T-1.9) Amend the Capital Improvement Program to identify selected streets and intersection improvements as priorities for funding. (Implementation Program T-1.A) Pursue creation of street utility assessment district and update Street Improvement Fee Program to pay for roadway and intersection improvements. (Implementation Programs T-1.B and T-1.C) Work with Caltrans to improve Trancas/Redwood and SR 29 and implement interim improvements while waiting for funding. (Implementation Program T-1.D)	S
2. The proposed General Plan would be in conformance with the Napa County Congestion Management Plan. (I)	NR	I
3. The Draft General Plan encourages access to and expansion of public transit services and facilities thereby enhancing mobility for local residents, employees, and commuters. Implementation of policies and programs supporting alternative modes of transportation would result in the added benefit of reduced energy use, air emissions, and automobile congestion. (B)	NR	B
4. The Draft General Plan encourages bicycle use and provision of bicycle facilities. In addition to reducing energy use, air emissions, and automobile congestion, the proposed bicycle plan would increase recreational opportunities for City residents and offer an alternative to the automobile. (B)	NR	B

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Page 47 of 688
APPENDIX E

Impacts	Mitigation Measures	Level of Significance After Mitigation
Transportation (continued)		
5. The Draft General Plan encourages the use and development of pedestrian services and facilities. The emphasis on an interconnected, safe pedestrian network has the beneficial effect of improving. (B)	NR	B
Community Services and Utilities		
Police and Fire Services		
1. Development accommodated by the Draft General Plan would increase the demand for police services but would not be expected to adversely affect response times. (I)	Maintain a five-minute emergency response time to Priority I calls and continue community-oriented education and involvement programs. (CS-2.2 and CS-4.1)	I
2. Development accommodated by the Draft General Plan would increase the demand for firefighters and equipment but would not be expected to adversely affect emergency response times by Napa Fire Department personnel. (I)	Maintain adequate personnel, equipment, and fireflow throughout the community. (CS-5.1, CS-5.6, and Policy Resolution 27) Continue mutual aid agreements with local and federal agencies. (CS-5.8) Prepare a Fire Services Master Plan. (Implementation Program CS-5.C)	I
Water Supply		
3. Development accommodated by the Draft General Plan could result in demand in excess of the City of Napa's water supply system during drought years. (S)	Implement water conservation programs. (CS-9.1 and Policy Resolution 27) Evaluate the feasibility of the use of reclaimed water. (CS-9.3) Enable the SWP to meet its obligations to the City by establishing programs and projects with state and federal agencies. (CS-9.6) Control urban development beyond the RUL. (CS-9.8) Implement the Public Works Department's Water System Optimization and Master Plan. (Implementation Program CS-9.A) Monitor new water system hook-ups in order to improve reliability of draught year water supplies to existing and proposed developments (proposed) (See EIR Chap 3.4for full text of mitigation)	PS

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Impacts	Mitigation Measures	Level of Significance After Mitigation
Community Services and Utilities (continued)		
Wastewater Treatment, Storage, and Disposal		
4. Development accommodated by the Draft General Plan would necessitate expansion of treatment capacity, solids handling facilities, and water reclamation efforts by the NSD. ~~However, policies and implementation programs contained in the General Plan and implementation of improvements suggested in the NSD's 1990 Wastewater Master Plan would ensure that adequate wastewater treatment, storage and disposal facilities are available. (I)~~ Based on existing NSD facility capacity, impacts to wastewater treatment capacity from future development is significant. (S) However, the City is proposing an additional mitigation in the form of a policy that would require that all new applicants for development secure a "will-serve" letter from the NSD if the District notifies the City that a critical capacity situation exists. The mitigation would reduce the impact to less than significant.	Promote the use of reclaimed water and water-conserving devices. (CS-10.1 and CS-10.2) Require all new applicants for developments to secure a "will-serve" letter from Napa Sanitation District if a critical capacity situation exists. (See EIR Chapter 3.4 for full text of mitigation)	I

Impacts	Mitigation Measures	Level of Significance After Mitigation
Solid Waste		
5. Development accommodated by the Draft General Plan would increase the City's solid waste disposal requirements. However, the increase is not expected to result in significant impacts to the present solid waste disposal system. (I)	Promote public awareness programs and continue monitoring the City's Source Reduction and Recycling element to ensure that the City meets established goals. (CS-12.1, CS-12.2, and Policy Resolution 27) Construct a Materials Recovery Facility if desired goals are not achievable. (Implementation Program CS-12.A)	I
Gas and Electric		
6. Development accommodated by the Draft General Plan would neither substantially increase overall per capita energy consumption nor substantially increase reliance on natural gas and oil. (I)	Require new developments to support mass transit and alternative modes of transportation (LU-5.3 and NR-5.1) Encourage on-site mixed uses for commercial properties. (LU-5.7) Encourage energy conservation and efficiency in land use patterns and improvement programs that reduce demand from power-generating facilities. (NR-5.2, NR-5.3, and Policy Resolution 27)	I
7. Development accommodated by the Draft General Plan would not adversely affect local and regional energy supplies. (I)	Please refer to Impact 6 (above) for mitigation measures.	I

Impacts	Mitigation Measures	Level of Significance After Mitigation
Community Services and Utilities (continued)		
Public Facilities		
8. Development accommodated by the Draft General Plan would increase the need for public facilities (new schools, libraries, corporation yards, public administration buildings) and the need for active recreational sites (parks). Potential impacts related to the construction and operation of public facilities are too speculative to assess at this time; potential impacts related to the construction and operation of parks were evaluated in a certified EIR on the City's Parks and Recreation Element in 1993. (I)	NR	I
9. Implementation of the proposed City trail system has the potential to cause indirect impacts to sensitive biological resources such as soil erosion and downstream sedimentation, excessive noise and lighting, and human encroachment. However, the design and location of proposed public trails would be consistent with resource preservation policies contained in the Draft General Plan and would keep potential impacts at less than significant levels. (I)	Protect riparian habitats from incompatible uses and activities. (NR-1.1) Control access to riparian habitats on public lands and locate parks, trails, and overlooks adjacent to areas protected from development. (NR-1.8 and PR-3.4) Utilize low-level lighting in parking areas. (Policy Resolution 27)	I

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Page 51 of 688
APPENDIX E

Impacts	Mitigation Measures	Level of Significance After Mitigation
Cultural Resources		
1. Development accommodated by the Draft General Plan may result in the unearthing of, and possible disturbance to, subsurface historic structures and archaeological sites. (I)	Enforce existing laws which mandate protecting, preserving, and identifying historic sites. Require investigations of potentially sensitive archeological areas when it appears that prehistoric resources may be affected. (HR-6.1 and HR-6.2.) Continue to enforce state mandates regarding discovery of archeological remains during construction. (Policy Resolution 27)	I
2. Development accommodated by the Draft General Plan would not result in impacts to historic properties within the City. (I)	Identify historic structures and resources for preservation. (HR-1.2, HR-1.3, and Implementation Program HR-1.N) Establish procedures and develop legislative/economic incentives as alternatives to demolition. (HR-1.10 and Implementation Programs HR-1.G) Adopt and implement rehabilitation guidelines in historic areas. (HR-1.6 and Implementation Program HR-1.M) Preserve historic properties and maintain the distinction of historic neighborhoods as it relates to the rest of the City. (LU-1.1, LU-1.4, LU-4.1, and Implementation Program LU-10.B)	I
3. The Draft General Plan provides for the identification and preservation of significant cultural and historical resources within the RUL. This preservation program will help to foster appreciation for the City's cultural heritage and significant historical and cultural resources. (B)	NR	B

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Page 52 of 688
APPENDIX E

Impacts	Mitigation Measures	Level of Significance After Mitigation
Visual Resources		
1. The Draft General Plan would ensure the preservation and enhancement of the visual character of existing urban uses in the RUL by imposing design standards on infill development. (I)	Require new development to be consistent with the existing neighborhood typology. (LU-4.1, LU-4.5, and LU-1.2) Require design guidelines regarding placement, scale, massing, and parking areas for new commercial developments. (Implementation Program LU-5.A) Develop commercial and office area standards. (Implementation Program LU-5.B) Ensure that new development is designed and operated to minimize adverse visual characteristics. (LU-7.4) Integrate development with the City's natural environment while protecting significant species of flora and fauna. (LU-9.1, NR-1.7, and Implementation Programs NR-1.A, NR-1.B, and NR-1.C) In addition, Policy Resolution 27 imposes standard mitigations related to lighting, landscaping, and signage.	I
2. The Napa General Plan would enhance the visual setting in the downtown area, along key gateways, scenic corridors, crucial corridors, and major roadways in the City. (B)	NR	B
3. The proposed expansion of the RUL would not detract from the region's scenic resources. (I)	NR	I
4. The Draft General Plan protects the scenic resources, especially the vineyards, that dominate the visual landscape. (B)	NR	B
5. The Draft General Plan is consistent with the Napa County General Plan's Scenic Highways Element regarding Scenic Highways. (I)	Improve the scenic character of the roadways through landscaping, utility undergrounding, street tree planting, and other improvements. (LU-1.6, LU-5.2, and LU-5.8)	I

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Page 53 of 688
APPENDIX E

Impacts	Mitigation Measures	Level of Significance After Mitigation
Biological Resources		
1. One endangered plant species (Contra Costa goldfields) and one rare plant species (Mason's lilaeopsis) are known to exist in areas proposed for urban development, and other sensitive species, such as the California red-legged frog, may occur in proposed development areas~~. However, existing federal and state laws and proposed policies in the Draft General Plan could avoid or minimize disturbance to these species to an insignificant level. (I)~~ The development contemplated by the General Plan may result in unavoidable significant impacts to rare and endangered plant and/or animal species that may exist within the RUL. The policies and programs of the General Plan cannot guarantee the avoidance of all adverse effects on listed species, the existence and location of which is not specifically known at the time of General Plan adoption. (S)	Maintain information about the location of rare, endangered and threatened species. (NR-2.1) Refer development proposals regarding sensitive plants and species to state and federal agencies. (NR-2.3) Protect and restore riparian and onsite habitat. (NR-1.1, NR-1.2, NR-1.4, NR-1.6, and NR-1.8) Add policies and implementation programs in the General Plan to ensure that the process for project level environmental review includes triggers for early review of potential impact to endangered species and that accurate information is available on which to base a future CEQA decision (NR-2.4, NR-2.A, NR-2.B). *(Text Revision for 12/98 FEIR – Double Underline / Strikethrough)*	~~I~~ S
2. Sensitive salt marsh species, including federal and state-listed endangered species, could be disturbed by development activity in the southern portion of the Stanly Ranch Planning Area. Policies and implementation programs contained in the Draft General Plan acknowledge these potential impacts and would serve to avoid or reduce the effects to an insignificant level. (I)	Apply special development standards to wetlands and critical wildlife habitat. (LU-9.2) Review and modify existing regulations regarding conservation and management of habitats. (Implementation Program NR-1.A) Refer development proposals regarding salt marshes to state and federal agencies. (NR-2.3) Please refer to impact 1 (above) for additional mitigation measures.	I

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Impacts	Mitigation Measures	Level of Significance After Mitigation
3. Environmentally sensitive sites could be impacted by nearby development. However, proposed policies in the Draft General Plan would serve to avoid or reduce these effects to an insignificant level. (I)	Provide alternative land use standards that integrate urban and environmental habitats. (LU 9.1) Maintain remaining wildlife corridors. (LU-9.3) Promote special development standards and encourage the maintenance of natural communities. (LU-9.4 and LU-9.5)	I
4. Native terrestrial vegetation and habitats within the RUL could be damaged or eliminated by development. However, proposed policies in the Draft General Plan would serve to avoid or reduce these effects to an insignificant level. (I)	Encourage the planting of native plant species in natural habitats. (NR-1.3) Require development to provide significant onsite protection of natural habitat. (NR-1.6 and NR-1.7)	I

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Page 55 of 688
APPENDIX E

Impacts	Mitigation Measures	Level of Significance After Mitigation
Geology, Soils and Seismicity		
1. Development accommodated by the Draft General Plan would be susceptible to potentially strong groundshaking from earthquakes. The Draft General Plan would, however, minimize these risks to an acceptable level. (I)	Discourage the siting of critical facilities from areas that are seismically unstable. (HS-1.2) Require new facilities to meet structural and seismic standards in hazardous areas. (HS-1.1, HS-1.3, HS-1.4, HS-1.6, and Policy Resolution 27)	I
2. Development accommodated by the Draft General Plan would be susceptible to liquefaction hazards. The Draft General Plan would, however, minimize these hazards to an acceptable level. (I)	Please refer to Impact 1 (above) for mitigation measures.	I
3. Development accommodated by the Draft General Plan and located on slopes 15 percent or greater would be exposed to risks of erosion and landslides. However, policies and implementation programs contained in the General Plan would reduce these risks to an insignificant level. (I)	Require erosion control plans and site investigations in high erosion and landslides areas. (HS-2.1, HS-2.4; Implementation Programs HS-2.A, HS-2.B, and HS-2.C; and Policy Resolution 27)	I
Hydrology		
1. Development accommodated by the Draft General Plan would occur within the 100-year floodplain of the Napa River. However, adherence to Federal Emergency Management (FEMA) regulations and participation in the National Flood Insurance Program would minimize potential flood hazards. (I)	Continue existing floodplain management programs. (HS-3.1, HS-3.3, and Policy Resolution 27) Continue coordination with US Army Corps of Engineers to develop a Napa River Flood Control project or develop other projects. (HS-3.7 and HS-3.9)	I

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Page 56 of 688

APPENDIX E

Impacts	Mitigation Measures	Level of Significance After Mitigation
Hydrology (continued)		
2. Development accommodated by the Draft General Plan would add minimal runoff volumes to the City's stormwater drainage system. (I)	Require new development to obtain NPDES permits, adhere to design standards for stormwater systems, and help finance necessary drainage improvements. (CS-11.2, CS-11.4, CS-11.5, CS-11.6, CS-11.7) Update Drainage Master Plan in order to prioritize and enhance the existing drainage system. (Implementation Program CS-11.A) In addition, Policy Resolution 27 contains standard mitigations related to minimizing water quality impacts from construction activities and storage of materials that could cause pollution.	I
3. Development accommodated by the Draft General Plan would not interfere with groundwater recharge. (I)	Require drainage and grading plan. (Policy Resolution 27)	I
4. Development accommodated by the Draft General Plan would not result in the destruction of natural drainageways. (I)	Protect riparian habitats from incompatible uses. (NR-1.1, NR-1.2, NR-1.3, NR-1.8 and Implementation Programs NR-1.A and NR-1.B) Review all projects that are within a 100 feet of a waterway in order to protect riparian and aquatic habitats. (NR-1.4 and Implementation Program NR-1.E) Regulate the speed of watercrafts to protect bank erosion and habitats. (Implementation Program NR-1.D)	I
Air Quality		
1. The rate of increase in VMT associated with the General Plan would not exceed ABAG's projected rate of population increase. (I)	NR	I

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Page 57 of 688
APPENDIX E

Impacts	Mitigation Measures	Level of Significance After Mitigation
Air Quality (continued)		
2. The proposed General Plan contains policies and implementation measures that would implement the transportation control measures in the Clean Air Plan. (I)	Establish 5 ft. bike lanes on both sides of all street at the collector level and above. (T-1.1) Develop and maintain a safe, integrated bicycle route network through residential neighborhoods and connecting to county lands. (T-6.1 through T-6.8 and T-8.1 and T-8.2, and Implementation Programs T-6.A through T-6.G, T-8.A, and T-8.B) Require the provision of bicycle racks and/or lockers for certain commercial and industrial projects. (T-7.1 and T-7.2 and Implementation Programs T-7.A and T-7.B) Require coordination between Napa Valley Unified School District and property owners to develop cost effective bicycle access to school sites. (T-9.8) Continue and expand the use of synchronized traffic signals on roadways susceptible to emissions improvement through approach control. (NR-5.6) Promote coordination of Napa transit services with inter-city and regional services and consolidate transit services to improve efficiency and improve commuter linkages to transit systems in other counties. (T-5.4 and T-5.5) Encourage employers to provide discount bus passes to employees to promote alternatives to single occupancy vehicles in commercial development. (T-5.12) Encourage developers to provide financial support to alternative commute modes and to provide carpool parking spaces. (T-5.13) Require new major development to support mass transit and alternative modes of transportation. (LU-5.3) Encourage developers of larger commercial projects to provide on-site mixed uses that would allow employees to make non-work related trips without use of their automobiles. (LU-5.7) Encourage land use patterns and management practices that conserve air and energy resources, such as mixed use development and provisions for local-serving commercial uses adjacent to neighborhoods. (NR-5.2) Encourage project designs that minimize direct and indirect air emissions. (NR-5.5)	I

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Page 58 of 688
APPENDIX E

Impacts	Mitigation Measures	Level of Significance After Mitigation
Air Quality (continued)		
3. The Draft General Plan contains measures that would buffer residential development from sources of potential odors and/or toxic air contaminants. (I)	Require an agricultural setback between the agricultural lands and residential uses so that potential conflicts are minimized. (LU-3.2 and LU-3.3) Ensure that industrial uses are designed and operated to minimize dust and air emissions, among other nuisances. (LU-7.4)	I
Noise		
1. There would not be any new residential areas exposed to noise levels greater than 70 dBA CNEL from vehicular traffic. (I)	Reduce noise impacts, evaluate and modify designated truck routes, and continue to enforce state muffler laws. (HS-9.3, HS-9.12, and HS-9.5) Establish noise and design compatibility guidelines and an interior CNEL of 45 dB. (HS-9.1 and HS-9.13) Use CEQA as an enforcement mechanism. (HS-9.2) Encourage site planning and building alternatives that minimize noise impacts. (HS-9.7 and HS-9.14)	I
Public Health & Safety		
1. Hazardous materials and waste associated with development accommodated by the Draft General Plan would not pose a significant hazard to people or animal and plant populations within the RUL or adjacent areas. The proposed The Draft General Plan contains policies and implementation programs that would reduce potential hazardous waste and materials impacts to an insignificant level. (I)	Support the County's proposed Integrated Waste Management Plan and all of the County's jurisdictions. (HS-7.2 and HS-7.3) Reevaluate, modify, and implement changes to the short-term goals of the Household Hazardous Waste Element. (HS-7.1) Maintain and improve emergency preparedness and response. (HS-8.1 and HS-8.18) Ensure that industrial development is designed and operated to minimize hazardous materials. (LU-7.4)	I

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Page 59 of 688
APPENDIX E

APPENDIX E

Chapter 1
Introduction

1.1 Purpose of this Environmental Impact Report

This Environmental Impact Report (EIR) is prepared pursuant to the California Environmental Quality Act (CEQA) of 1970, as amended, and in accordance with State and City of Napa implementing guidelines. An EIR is an informational document that enables the general public and decision-makers to evaluate the potential significant effects of a proposed project. It identifies and evaluates reasonable alternatives to the proposed project, and discusses feasible mitigation measures to avoid or reduce significant adverse effects. In so doing, an EIR provides useful insight to local and state decision-makers as they judge the merits of a proposed project.

The purpose of this EIR is to evaluate the environmental impacts of the adoption and implementation of the Draft Napa General Plan. Adoption of the General Plan by itself does not result in land development, additional traffic, or loss of natural resources; however, it enables such development or actions to occur. This EIR, therefore, addresses what may occur as a result of General Plan adoption. Because this EIR addresses a series of future actions, this EIR is a "program" EIR. The concept of a program EIR was incorporated into the CEQA Guidelines in recognition of the fact that many types of projects that require environmental review are approved over time in a series of actions. The Legislature and the state administrators of CEQA recognized that it would be inefficient to require a new environmental document at each stage of development unless that stage disclosed new facts or environmental considerations not previously studied or analyzed — in which case those additional effects would be addressed by an additional document. The program EIR allows decision-makers to consider broad policy alternatives and program-wide mitigation measures at a point when the City has greater flexibility to deal with basic problems or cumulative impacts. Notably, with a good and detailed analysis of the program, many subsequent activities could be found to be within the scope of the proposed project described in the program EIR, and little or no further environmental documentation may ~~would~~ be required. This EIR can also be considered a "first-tier" EIR. Tiering refers to the concept of a "multi-tiered" approach to preparing EIRs. The first-tier EIR would cover general issues in a broader program oriented analysis. Subsequent tiers would incorporate by reference the general discussion from the broader EIR, while primarily concentrating on the issues specific to the action being evaluated. Tiering is a method to streamline EIR preparation by allowing a lead agency to focus on the issues which are ripe for decision and exclude from consideration issues already decided or not yet ripe [Guidelines Section 15385]. ~~Note, however, that project specific environmental documents may be required.~~

When project-specific impacts are reviewed by the City, a set of standard mitigations is imposed according to the City of Napa CEQA implementing requirements (Policy Resolution 27). This set of standard mitigations is appropriate to consider as mitigations available for the General Plan. Policy Resolution 27 is included in this EIR in Appendix B.

1.2 APPROACH TO THE NAPA GENERAL PLAN EIR

Unlike a project-specific EIR for a new housing development or a retail center, a General Plan EIR does not document precise, location-specific impacts, The General Plan recommends, for example, a general land use pattern for a particular area of the City. It does not specify a precise number of houses, the parcelization pattern of proposed development, or their design. Consequently, the level of analysis is much less detailed for a General Plan EIR. The CEQA Guidelines state that "the degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR" (Section 15146). More on point, the CEQA Guidelines note that:

> An EIR on a project such as the adoption or amendment of a comprehensive zoning ordinance or a local general plan should focus on the secondary effects that can be expected to follow from the adoption, or amendment, but the EIR need not be as detailed as an EIR on the specific construction projects that might follow (Section 15146(b)).

In addition, the CEQA Guidelines recognize the desirability of reducing the size of EIRs. Accordingly, Section 15150 of Guidelines authorizes the use of incorporation by reference of any portion of relevant documents that provide general background to the EIR, provided that the incorporated documents are a matter of public record and are available for public review. A great deal of information has been compiled during the General Plan process that is required for the EIR and incorporated by reference. The incorporated documents include:

- Draft General Plan Policy Document, August 16, 1996; and
- Draft General Plan Background Report, September 1996.

These documents are available for review at the Napa City Planning Department, at 1600 First Street, P. O. Box 660, Napa, CA, 94559-0660. Table 1-1 identifies the requirements of an EIR and where in the incorporated documents and this Draft EIR these requirements are addressed.

1.3 ENVIRONMENTAL IMPACT REVIEW PROCESS

Private and public projects in California, including land development, are subject to environmental review under CEQA. The City of Napa is the designated "lead agency" responsible for the General Plan. The lead agency, according to CEQA, is the one public agency most responsible for carrying out and approving the proposed project.

In accordance with CEQA procedure requirements, a Notice of Preparation (NOP) informing public agencies of the City of Napa's intent to prepare an EIR for the comprehensive update to its 1982 General Plan was submitted to the State Office of Planning and Research (OPR) on March 15, 1995. Comments on the NOP were received from three agencies: the State Regional Water Quality Control Board, the Metropolitan Transportation Commission, and the State Department of Transportation Office of Transportation Planning. Concerns expressed in these comments are addressed in this document. Copies of the NOP and the responses are reproduced in this Draft EIR as Appendix A.

The Draft EIR for the Draft City of Napa General Plan was formally released for public review on October 4, 1996, marking the beginning of a 45 day mandatory review period concluding on November

18th. In response to requests made at the DEIR hearings the Planning Commission extended the review period to December 2, 1996, resulting in a total DEIR review period of 60 days.

On October 4, copies of the Draft EIR and other Draft General Plan Documents were sent to 30 organizations and local, state and federal agencies either directly or through the State Clearinghouse. Additional document sets were provided to local organizations such as the Chamber of Commerce, Board of Realtors etc. Fifteen sets of the Draft General Plan Documents and DEIR were submitted to the State Clearinghouse along with a notice of completion indicating the desired distribution for state agency review. A "Notice of Completion and Availability" of the Draft General Plan and DEIR documents were mailed to 409 individuals who had requested written notice of the General Plan availability and proceedings. A display ad was published in the local newspaper notifying the public of document availability and the public review and comment process. Copies of the Draft EIR and General Plan documents were made available for review at the City of Napa Planning Department and at the City/County Library. Copies were also provided for check-out or purchase at the Planning Department.

On November 18, 1996, a notice of extension of the public review period to December 2 was sent to all agencies and parties previously noticed as described above and another display ad regarding the extension was published in the local newspaper availability of Addenda #1 and #2 to the Policy Document was included in the notice and copies of the addenda were circulated to Agencies for comment. On November 25, the City published an additional notice in the newspaper regarding the availability of two Addenda to the General Plan Policy Document. It should be noted that the Addenda has been distributed to the Planning Commission and informally made available to the public in late October 1996.

Although not legally required by CEQA, during the public review period, the Planning Commission held hearings on October 17th and October 24, 1996, to receive input on the Draft EIR. Also during the public review period, the Planning Commission held six study sessions on the General Plan Documents. These study sessions were noticed and open to the public; and, in most cases, occurred as the last item on a regular Planning Commission Agenda.

By the close of the extended review period on December 2, 1996, the City had received 38 written communications. During the two public hearings on the Draft EIR held on October 17th and October 24th, the City received oral testimony from seven individuals. After the close of the public comment period on December 2nd, the City received three additional written communications. The communications and hearing record constituted a total of 344 separate comments, each requiring a written response.

Section 15088.5 of the *State CEQA Guidelines* requires recirculation of an EIR when significant new information is added to the EIR after the draft has been released for public review. While the City does not feel recirculation of the Draft General Plan EIR is required by the *CEQA Guidelines* in this case, the City has nonetheless revised and recirculated the Draft EIR to:

- Expand the background information concerning several categories of impacts
- Provide more detailed explanation of environmental conclusions
- Reexamine findings of significance for several impacts
- Provide an opportunity for public comment on this additional information.

The City believes recirculation will result in a more informed discussion of the General Plan and ultimately to a more complete set of general plan goals, policies, and implementation measures.

The Draft EIR has been revised in the following ways:

1. A verbatim copy of and a summary of all comments on the Draft General Plan and the Draft EIR during the public review period in the Fall of 1996 and a response to all comments have been added to the Draft EIR.

2. The project description has been revised to:

   a. Adjust the RUL to include a 5 acre parcel at the northeast corner of Trancas and Silverado Trail and to designate it TC - Tourist Commercial. The subject parcel has been incorporated land under City's jurisdiction since March 1973 and is inside the City's Sphere of Influence.

   b. Designate land outside the proposed RUL as "G" - Greenbelt. This represents a continuation of the designation in the existing General Plan.

   c. Revise the General Plan to reflect the adoption of the Big Ranch Specific Plan in October 1996. These changes involve land use designations, circulation adjustments and minor text references to the status of the Big Ranch Specific Plan.

   d. Eliminate the Sousa Lane roadway connection in the transportation project list.

3. The text of the Draft EIR has been revised to add or correct descriptive information based on comments on the Draft EIR.

4. Significance criteria for some types of impacts have been revised based on reconsideration and review of other related environmental documents.

5. Findings of Significance for several types of impacts have been revised based on reconsideration and review of other related environmental documents.

The Revised Draft EIR shows changes made to the October 2, 1996, Draft EIR through underline and strikeout.

This Revised Draft EIR is a public disclosure document and identifies the physical environmental effects of the Draft General Plan. Copies of this Revised Draft EIR were submitted to the State OPR, to local libraries, and the County, signaling the start of a 45-day public review and comment period. Comments on the Revised Draft EIR should focus on any shortcomings in the EIR (i.e., areas requiring further clarification or analysis) or any additional alternatives or mitigation measures that should be included. Readers are invited to submit written comments to:

John Yost, Planning Director
City of Napa, Planning Department
1600 First Street
Napa, CA 94559-0660

Table 1-1

Napa General Plan Documentation Satisfying EIR Requirements

EIR Requirement	Corresponding Document
Summary	See this Draft EIR, Summary.
Project Description	
• Project location and boundaries	Refer to the Draft General Plan, Chapter 1, "Regional Setting" and Figure 1; Figures LU1, LU2, and LU3 of the Background Report; and Draft EIR, Sections 2.1-2.3.
• Project objectives	Refer to the Draft General Plan, Chapter 1, "Major General Plan Themes;" and Draft EIR, Table 2-1.
• General project description	Refer to the Draft General Plan, Chapter 1, "Purpose and Nature of the General Plan;" and Draft EIR, Section 2.4.
• Intended uses of the EIR	Refer to this Draft EIR, Section 1.4.
Environmental Setting	
• Existing conditions	Refer to the Draft General Plan, Chapter 1, "Napa General Plan Context" and "Environmental Constraints;" and Background Report.
• Regional setting/unique resources	Refer to the same documents identified above for existing conditions.
• Consistency with applicable plans	Refer to this Draft EIR, Chapter 3.
Environmental Impact	
• Significant environmental effects	Refer to this Draft EIR, Chapter 3.
• Unavoidable adverse effects	Refer to this Draft EIR, Chapter 3 and Section 4.2.
• Mitigation measures	Refer to this Draft EIR, Chapter 3.
Alternatives	
• Others considered but rejected	Refer to this Draft EIR, Chapter 5 and Futures Report.
• No project	Refer to this Draft EIR, Chapter 5.
• Environmentally superior alternative	Refer to this Draft EIR, Chapter 5.
• Other feasible alternatives	Refer to this Draft EIR, Chapter 5.
Significant Irreversible Environmental Changes	Refer to this Draft EIR, Section 4.5.
Growth-Inducing Impacts	Refer to this Draft EIR, Section 4.3.
Effects Found Not to be Significant	Refer to this Draft EIR, Section 4.2.
Organizations and Persons Consulted	Refer to all previous documentation; also, refer to this Draft EIR, Chapter 6.
Cumulative Impacts	Refer to this Draft EIR, Section 4.4.

Public hearings will be scheduled to receive oral and written testimony on the Revised Draft EIR. The hearing dates will be announced in local newspapers. Following the close of the public review and comment period (45 days), responses will be prepared to address all substantive comments on the Revised Draft EIR. These responses along with the Revised Draft EIR will constitute the Final EIR.

The Napa City Council must certify that the EIR is adequate and complies with the requirements of CEQA before the General Plan can be adopted. If the EIR identifies one or more significant impacts of the proposed project, the lead agency must make specific findings for each of the significant effects. Possible findings may acknowledge that changes have been incorporated into the project to avoid or substantially lessen the significant impact; that such changes are within the jurisdiction of another agency; or that specific economic, social, or other considerations make infeasible the mitigation measures or project alternatives identified in the Final EIR.

1.4 USE OF THIS DOCUMENT

This EIR is being prepared to meet the mandates of CEQA by providing full public disclosure of the proposed project's potential environmental effects. This document will be used by various public agencies and citizens to evaluate the ability of the proposed project to satisfactorily address potential environmental impacts and to meet permitting requirements and community standards.

The following key local agencies and governing bodies will use this EIR in their reviews of the proposed project.

- The Napa City Council will evaluate the EIR to understand the environmental implications of adopting the General Plan, referred to as *Envision Napa 2020*. The City Council must adopt findings that the EIR conforms with CEQA when certifying the EIR.
- Napa County will evaluate the EIR to understand the environmental impacts of the proposed land use changes in the unincorporated portion of the Rural Urban Limit. ~~As a responsible agency,~~ The County will comment on the environmental impacts of the General Plan on lands within its jurisdiction, as well as on assumptions used by the City regarding County provision of services and protection of natural resources.
- The Airport Land Use Commission will evaluate the EIR to understand the relationship of the General Plan with the Napa County Airport Master Plan and impacts on current and future airport operations.
- The Napa County Congestion Management Authority will evaluate the EIR to understand potential traffic impacts on major County roadways resulting from development permitted by the City of Napa General Plan.

In addition, the City will distribute this document to all responsible agencies (i.e., public agencies other than the lead agency which have discretionary review over the project). These agencies, include state entities such as the Regional Water Quality Control Board, the Bay Area Air Quality Management District, and the State Department of Transportation, as well as local/regional entities such as the Napa Sanitation District, the Local Agency Formation Commission, and the Association of Bay Area Governments. Each of the agencies will review the Napa General Plan and this Draft EIR to determine the project's consistency and effects on each agency's mission, plans, and programs.

Chapter 2
Project Description

2.1 Project Background

Pursuant to State Government Code Section 65300, every city in California must prepare and adopt "a comprehensive, long-term General Plan for the physical development" of the community. A general plan must address seven specific issues under State law: Land Use, Circulation, Housing, Conservation, Open Space, Safety, and Noise. Other elements may be included as deemed appropriate by the jurisdiction. The City of Napa General Plan, last fully updated in 1982, includes the seven mandatory elements, as well as optional elements for Scenic Highways, Historic Preservation, and Parks and Recreation. The City has now prepared a comprehensive revision of the 1982 General Plan. The revised plan, including updated policies and implementation programs, is the "proposed project" being evaluated in this EIR.

2.2 Project Location

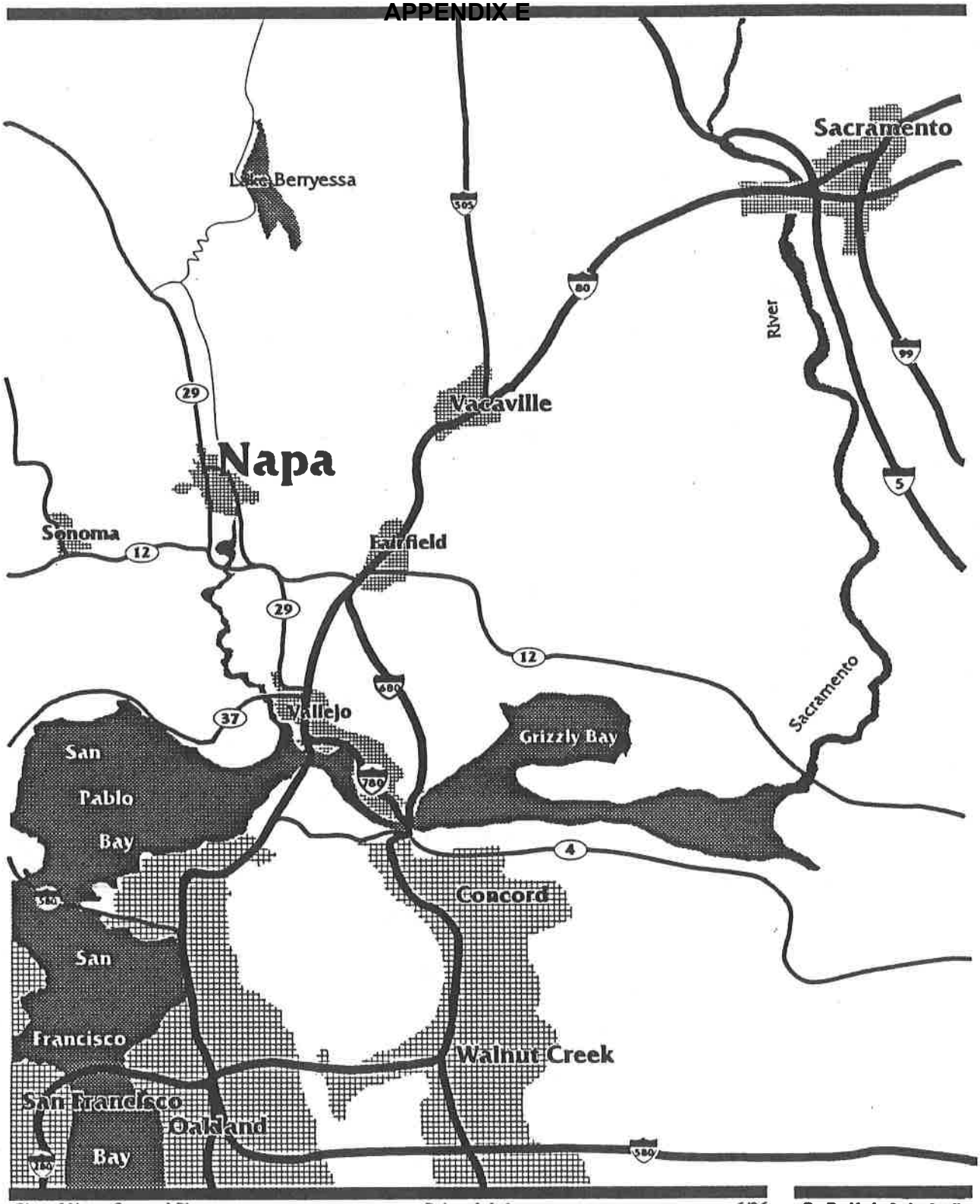
The City of Napa is located along the Napa River in the southern portion of the Napa Valley, 52 miles northeast of San Francisco and 61 miles southwest of Sacramento (Figure 2-1). Most of the City is on relatively level terrain, except the eastern and western edges which extend into brush and oak-covered foothills. The City abuts agricultural lands, predominantly vineyards, to the north. To the south lie agricultural and marsh lands and the Napa County Airport. Regional access to Napa is primarily via State Highways 12, 29, 121, and 221 which connect with interstates to the south and north.

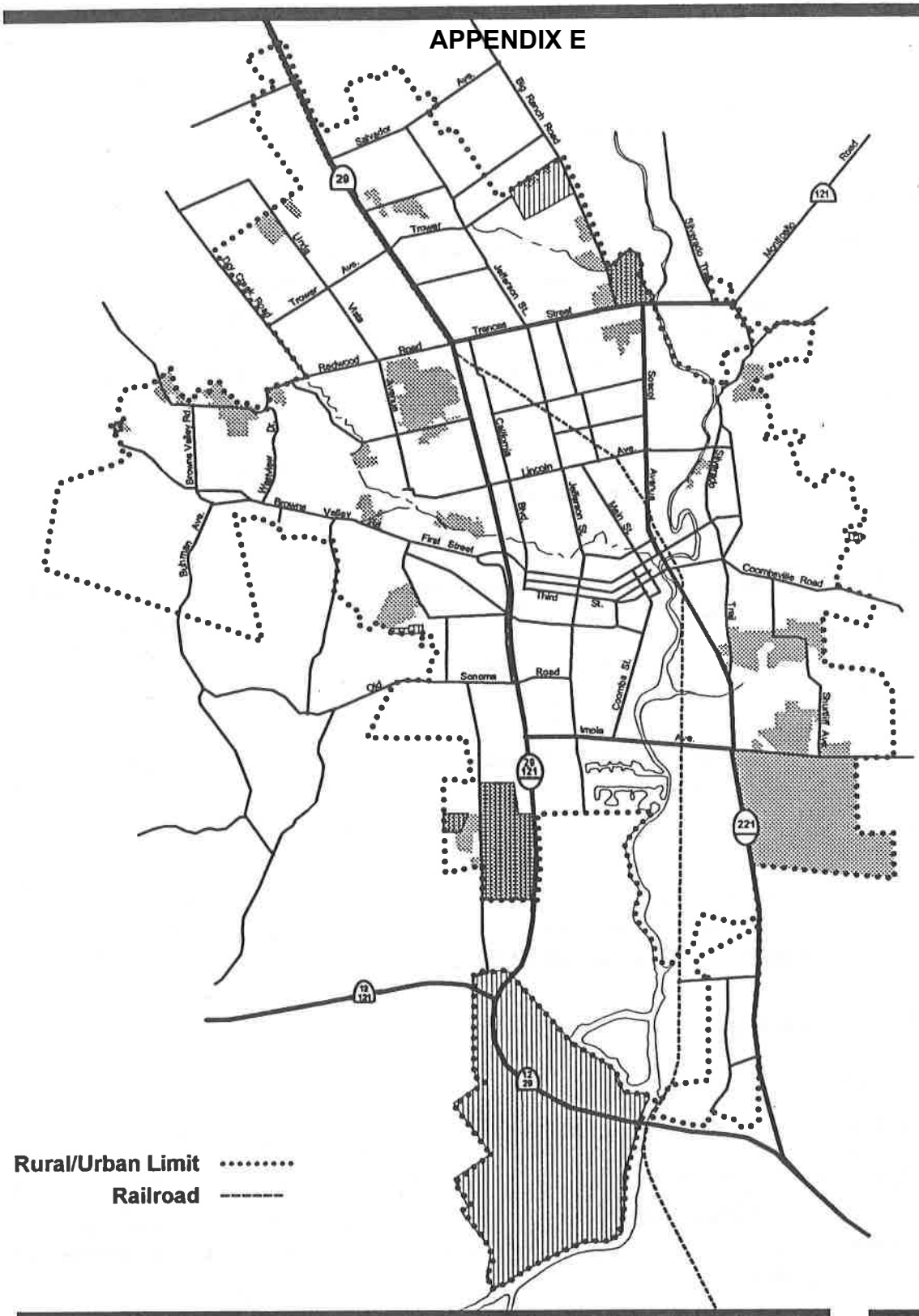
2.3 Project Area

The incorporated area of Napa is slightly less than 18.2 square miles. The Napa sphere of influence (SOI) includes incorporated City lands plus unincorporated lands that may be considered for future annexation by the City of Napa. Slightly larger and encompassing the SOI is the City's Rural Urban Limit (RUL), which delineates Napa's urban growth boundary. Growth projections and urban development policies in the proposed General Plan are for the area within this RUL. The RUL has been subdivided into 12 planning areas for data collection and planning analyses. The area within the RUL, shown in Figure 2-2, is the project area for this EIR.

2.4 Project Characteristics

The City of Napa is proposing a comprehensive update of the 1982 General Plan (last updated in 1986). The Draft General Plan, called *Envision Napa 2020*, consists of two documents: the Draft Policy Document and the Draft Background Report. The Draft Policy Document features goals, policies, and implementation programs for each of the General Plan elements. The Draft Background Report describes existing land use, environmental, social, and demographic conditions that supplement and expand the documentation of the environmental setting for this EIR and that respond to data requirements of State planning law. The major themes and ideas of the Draft General Plan are presented below.


Sacramento
Lake Berryessa
505
80
River
99
29
Vacaville
Napa
5
Sonoma
12
Fairfield
29
12
680
Vallejo
37
Grizzly Bay
Sacramento
San
Pablo
Bay
780
4
580
Concord
San
Francisco
Walnut Creek
San Francisco
Oakland
Bay
580
City of Napa General Plan
Rgional.ds4
6/96
Figure 2-1
Regional Location of Project Site
North
Legend:
Watercourse
Urban Area
Roadway
1 Mile
8 Miles
24 Miles
0
4 Miles
While every effort has been made to insure the accuracy of the information shown on this page, the City of Napa assumes no responsibility for liability from any errors or omissions.
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NAPA
2020



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Figure 2-2

Project Area and Rural Urban Limit

North

725' 1/2 Mile 1 Mile 3 Miles

0

Parcels located outside of the Sphere of Influence

County Parcels within the RUL

While every effort has been made to insure the accuracy of the information shown on this page, the City of Napa assumes no responsibility for liability from any errors or omissions.

envision NAPA 2020

General Plan Goals and Policy Framework

Project Objectives

The goals of the Draft General Plan were derived from six central planning themes identified during the City's two-year community outreach process. These goals largely affirm past themes, while adding new concepts appropriate to a more mature, developed City. Many of the themes have been articulated as public policy for decades and continue to guide the City's evolving urban pattern. The major themes of the General Plan are maintaining the physical and social qualities of Napa within an economically healthy and self-sufficient community.

1. Contain growth within the Rural Urban Limit Line.
2. Conserve the character of existing neighborhoods.
3. Improve the City's jobs/housing balance.
4. Recognize the fragility of Napa's precious natural resources and focus protection on wetlands, other scarce habitats, hillsides and agricultural lands adjacent to but outside the RUL.
5. Promote a sustainable economy: a healthy economy with jobs that "fit" the needs of residents.
6. Maintain a vital and healthy Downtown.
7. Consider the environmental and financial costs of flood control along the Napa River and encourage appropriate development.

Key Project Goals

The Draft General Plan's goals are based on goal statements developed by the groups and individuals who participated in the General Plan update visioning process. They describe the kind of city Napa should both remain and aspire to become. Key goals are highlighted in Table 2-1.

Key Implementation Strategies

Growth Management

The Draft General Plan is based in part on a three part growth management strategy featuring:

1. A **confined city policy** implemented through continued reliance on the Rural Urban Limit.
2. A **context sensitive residential development policy** aimed at preserving the physical aspects of "neighborhood character." This approach could best be implemented through adoption of residential design guidelines.
3. A **development pacing or staging system** to ensure the rate of growth does not exhaust the city's remaining residential land supply before the end of the planning period (i.e., 2020).

A "confined city" strategy (i.e., planning for only as much population and employment as can be comfortably accommodated within the 18.2-square-mile RUL) would ensure the City retains a defined urban area surrounded by a permanent greenbelt of open space. In fact, proposed changes to the RUL are

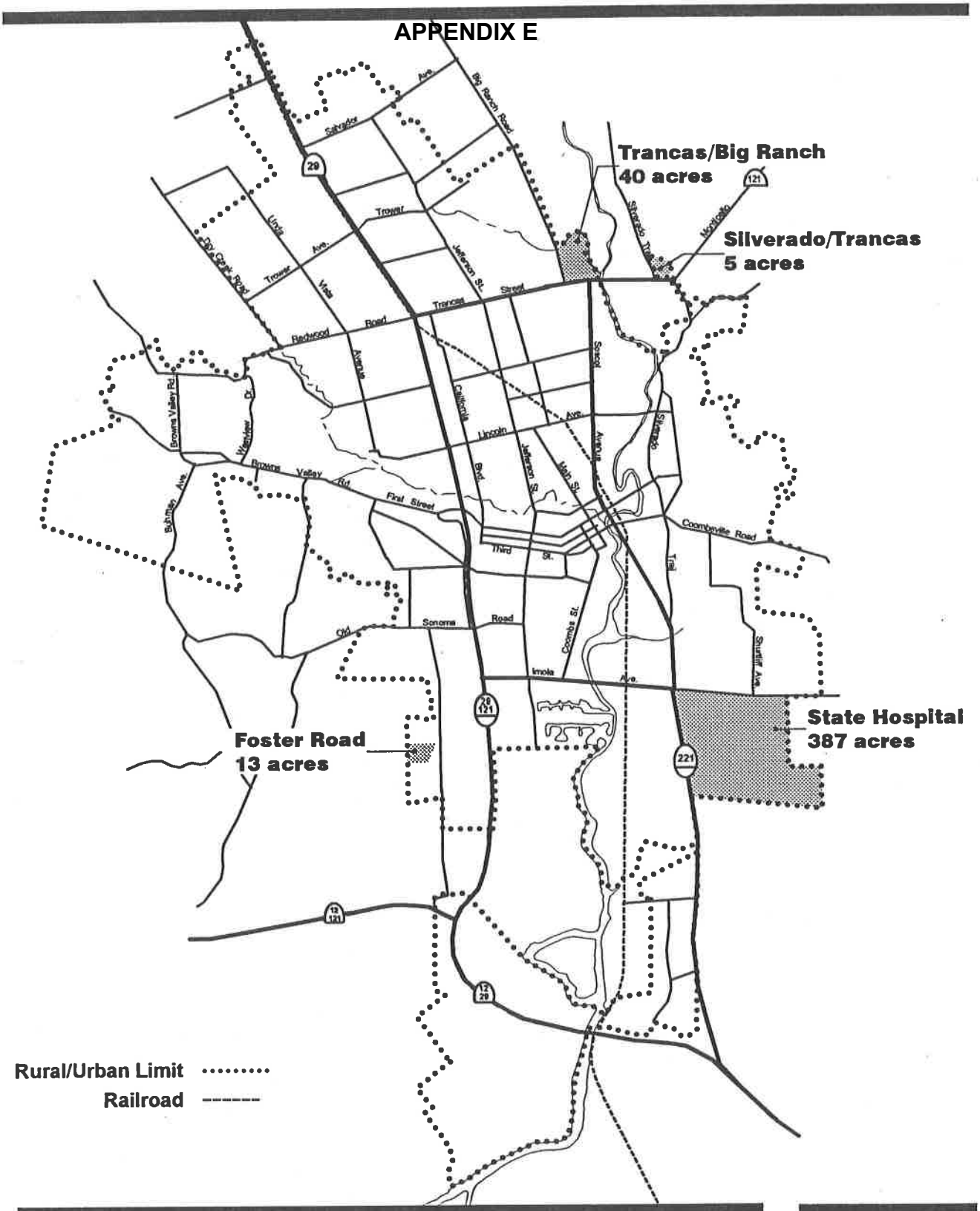
limited to ~~three~~ four-areas, described below and shown on Figure 2-3. ~~The first area, the Napa State Hospital, has been part of the City's SOI for over 15 years. This site, located adjacent to the River East Planning Area, totals approximately 387 acres. A second expansion area, approximately 40 acres, is at the northeast corner of the Big Ranch Road/Trancas Street intersection. This area is located next to the City's SOI and the Vintage Planning Area. The third area proposed for inclusion in the RUL is an approximately 13 acre site west of Foster Road in the Westwood Planning Area, also outside the City's SOI.~~

State Hospital: This 387 acre area is the largest area to be added to the RUL and is already within the City's Sphere of Influence, within the service boundary of the Napa Sanitation District and is served by City water. The institutional development on the property is urban in nature and inclusion in the RUL will enable improved coordination for City services (including fire and police) in the future. The Draft General Plan does not assign any new development potential to the State Hospital and assumes that it will continue as an institutional facility.

Foster Road Parcel: This 13 acre parcel of vacant land is outside of the Sphere of Influence but is bordered by incorporated land on the north, east and south sides. City services are available and the construction or extension of major facilities will not be required to serve the potential low density residential development that is projected to occur there. The RUL and SOI currently create a conspicuous notch excluding this parcel and the proposed adjustment will create a more sensible edge (roughly along the watershed line) between urban and rural uses.

Trancas/Big Ranch: The current RUL boundary between the land on the northeast corner of Big Ranch Road and Trancas Street and the City is the center line of the roadways. The proposed adjustment will place the RUL along the Salvador Channel and its mature line of riparian vegetation which is a better defined, natural boundary and buffer between urban and rural development. This adjustment will encompass an approximately 40-acre site.

Trancas/Silverado Trail: This vacant approximately 5-acre site is located at the northeast corner of Trancas and Silverado Trail. This parcel has been incorporated land under the City's jurisdiction since 1973; it falls within Napa's Sphere of Influence; but it is outside Napa Sanitation District's Service Boundary. As a result of a lawsuit that followed a complex documentation process involving adjacent land, a superior court decision re-confirmed that this property is part of the City of Napa. Placing the RUL around this parcel allows for the RUL policies for properties adjacent to agricultural and open space lands to be applied to development of this parcel.



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Figure 2-3

RUL Adjustment Areas

North

RUL Adjusted Areas

725' 1/2 Mile 1 Mile 3 Miles

0

While every effort has been made to insure the accuracy of the information shown on this page, the City of Napa assumes no responsibility for liability from any errors or omissions.

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Table 2-1
City of Napa General Plan Goals

Land Use Goals

LU-1: To maintain and enhance Napa's small-town qualities and unique community identity.

LU-2: To maintain the Rural Urban Limit (RUL) to contain urban development and support Napa County's agricultural and other resource uses.

LU-3: To maintain an even rate of development within the RUL over the time frame of the General Plan.

LU-4: To preserve and enhance the residential character of existing neighborhoods and provide for new residential development consistent with the city's character and urban form.

LU-5: To encourage attractive, well-located commercial development to serve the needs of Napa residents, workers, and visitors.

LU-6: To improve the vitality and character of downtown through planning, design, business-community partnerships, and City programs and projects that encourage a variety of social, entertainment, cultural, retail, administrative, and government uses.

LU-7: To achieve diverse industrial opportunities in suitable locations to provide employment for Napa residents and promote economic growth in the city.

LU-8: To promote the development of projects with a mix of uses to reduce the need for automotive travel and improve their vitality.

LU-9: An urban pattern that recognizes the opportunities and constraints presented by the environmental setting and includes accessible natural amenities - including hills, watercourses, and wetlands - benefiting city residents, workers and visitors.

LU-10: To create a balanced economy by encouraging partnerships with the business community and encouraging a diverse economy.

Housing Goals

H-1: To provide a sufficient number of affordable housing units to meet the needs of Napa residents and provide a fair share of the market area housing needs and attempt to achieve ABAG housing needs figures for the state-mandated time frame of the Housing Element period.

H-2: To ensure increased energy self-sufficiency through use of energy conservation measures in all homes, including low-and moderate-income housing.

II-3: To ensure that the quality, safety, affordability and livability of the housing stock in the City of Napa is continually maintained or upgraded and that dilapidated housing which cannot be improved is replaced.

Table 2-1 (continued)
City of Napa General Plan Goals

H-4: To retain and conserve the existing supply of high quality housing affordable to low and moderate income households.

H-5: To insure that housing programs maximize choice, avoid economic segregation, and avoid discrimination based on age, sex, race and ethnic background.

H-6: To ensure that the goals, implementation measures and specific housing programs in this document are pursued within the established time frame, and continue to be compatible with other elements of the General Plan.

Transportation Goals

T-1: To provide for extension and improvement of the city's roadway system to ensure the safe and efficient movement of people and goods.

T-2: To maintain an adequate road system that is attractive and provides for efficient movement of people, goods, and services within the city, and adequate connections to the region and state.

T-3: To maintain acceptable traffic flow along Napa's crucial corridors.

T-4: To protect residential neighborhoods from high-volume and high-speed traffic and its effects.

T-5: To develop and maintain an efficient and convenient transit system providing alternatives to the use of the personal automobile to residents, workers and visitors within the city, with connections to Napa County and the region.

T-6: To develop and maintain a safe, integrated bicycle route network for residents and visitors, connecting key destinations to neighborhoods, neighborhoods to each other, and the city of Napa to the county.

T-7: To develop and maintain bicycle support facilities in appropriate locations to encourage the use of bicycle travel in Napa.

T-8: To improve bicycle safety in promoting the use of bicycle travel in the city.

T-9: To provide an interconnected pedestrian network providing safe access between residential areas, public uses, shopping, and employment centers, with special attention to a high quality downtown pedestrian environment with links to neighborhoods.

T-10: To provide convenient access for residents and businesses to a variety of modes of transportation.

Table 2-1 (continued)
City of Napa General Plan Goals

Community Services Goals

CS-1: To ensure the timely development of public facilities and the maintenance of adequate service levels for these facilities to meet the needs of existing and future city residents.

CS-2: To ensure community order and public safety in Napa.

CS-3: To maintain an adequate police force to ensure a safe and secure community.

CS-4: To reduce and prevent crime through the use of community-oriented education and involvement programs.

CS-5: To provide emergency fire suppression services to protect life and property within the city.

CS-6: To prevent fires and maintain safe neighborhood conditions through the use of community-oriented educational and involvement programs.

CS-7: To provide emergency medical services adequate to meet the call demands within the city.

CS-8: To provide for the educational needs of all Napa residents.

CS-9: To ensure adequate, reliable, and safe water supplies to the community, even through drought periods of similar intensity as the 1986-1992 drought.

CS-10: To ensure adequate wastewater collection and treatment and the safe disposal of wastes.

CS-11: To develop and maintain a safe, attractive and environmentally sensitive drainage system for handling runoff due to seasonal rainstorms.

CS-12: To provide for safe and environmentally sound municipal waste reduction and recycling programs that will allow the city to attain the requirements of AB 939.

Parks and Recreation Goals

PR-1: To develop a system of well-maintained and fully improved local and citywide serving parks and recreation facilities which meet the needs of the residents of Napa.

PR-2: To provide an adequate and diverse source for developing and maintaining parks and recreational facilities.

PR-3: To develop and maintain an open space and parks system which protects and reinforces the natural and historic character of the city and region, and which is consistent with conservation goals.

PR-4: To maintain a diverse range of publicly available recreation and leisure programs and community centers which serve the needs of all sectors of Napa's population, including youth, adult, and senior activities.

Table 2-1 (continued)
City of Napa General Plan Goals

PR-5: To develop a comprehensive system of trails for bicycle and pedestrian traffic both within the existing urbanized area and connecting to surrounding County areas.

PR-6: To develop a major public multi-use trail and amenities along the Napa River, while protecting and enhancing the natural resources along the trail corridor.

PR-7: To recognize the importance of cultural activities as an integral factor in sustaining the community's high quality of life.

Historic Resources Goals

HR-1: To preserve and maintain sites, buildings, and landscapes that serve as significant, visible reminders of the city's social, architectural, and agricultural history.

HR-2: To encourage owners of historic resources to preserve or upgrade historic properties by improving their economic viability.

HR-3: To promote community awareness and appreciation of Napa's history and architecture.

HR-4: To achieve a vital downtown that reflects its historic urban form and setting, offering a mix of old and new buildings.

HR-5: To maintain historic neighborhoods that provide a diverse mix of housing types and services to meet the needs of families and build a sense of community.

HR-6: To preserve important archaeological resources.

Natural Resources Goals

NR-1: To manage the natural resources and open space areas in and around the city to preserve and enhance plant and wildlife habitats.

NR-2: To recognize and support the preservation of rare, endangered and threatened species and of other unique and fragile biological environments.

NR-3: To educate and involve the public in the stewardship of the area's natural resources.

NR-4: To protect and enhance surface water and ground water quality.

NR-5: To maintain acceptable levels of air quality in Napa.

Health and Safety Goals

HS-1: To minimize the risk to life and property from seismic activity.

HS-2: To minimize the hazards to people and property caused by soil erosion and landslides.

HS-3: To reduce the risk to life and property from flooding.

Table 2-1 (continued)
City of Napa General Plan Goals

HS-4: To protect life and property in the City of Napa from the hazard of inundation by flood waters resulting from the failure of water supply reservoir dams.

HS-5: To reduce the risk of life and property from wildland fires.

HS-6: To protect development from hazards due to aircraft.

HS-7: To reduce the risks to health and safety from hazardous wastes.

HS-8: A community that is informed and educated about natural hazards and safety procedures, and which participates in County emergency response efforts.

HS-9: To protect Napa's residents, workers and visitors from the deleterious effects of noise.

Administration Goals

A-1: To provide for the ongoing administration and implementation of the General Plan.

A-2: To ensure that any expansions of the RUL are consistent with City and County goals for environmental protection and growth management.

Source: City of Napa General Plan Update, Draft Policy Document, August 1996.

Given that the City's physical size would remain relatively static, the housing growth rate would slow as land supply continued to diminish. As a result, City population would be expected to reach 81,100 by the year 2020.

A proposed development monitoring program would provide important feedback regarding implementation of the new General Plan. Development monitoring would track the relationship between new housing stock, household incomes, and public service availability. The plan is based on ensuring that adequate infrastructure and services can be made available in a timely manner and on maintaining balanced growth between jobs and housing.

Self-Mitigating Policies

The Draft General Plan has been designed to be a self-mitigating plan; that is, the plan promotes a land use pattern and contains policy statements to mitigate environmental impacts that might otherwise be expected with growth and land development. Potential limitations to development, which were identified in the Background Report, include sensitive biological resources, prime agricultural soils, geotechnical hazards, excessive noise exposure areas, and flood/inundation areas. Policies to mitigate these development constraints address preserving Napa's natural resources, protecting the public and property from natural and man-made hazards, and attaining desired service levels. These mitigation policies apply regardless of the land use pattern and intensity. In this EIR, these policies are acknowledged as mitigation measures included in the proposed project, and, as part of the project, would serve to help avoid potential impacts.

Environmental Protection

The Draft General Plan acknowledges that Napa's beautiful natural environment leaves a lasting impression on residents and visitors. This environment includes the area's vineyards and wineries, hillsides and open grasslands, marshlands along the Napa River, and the River itself. To afford continued protection to these resources, the plan recommends that:

- new development and redevelopment enhance connections between the built and natural environment;
- the Napa River serve as a natural corridor and recreational spine connecting neighborhoods and providing a focus for downtown;
- open space resources including agriculture, the hills, water courses, wetlands, and views of the natural environment be preserved; and
- an array of protected natural amenities both within and beyond the confines of the City be accessible.

General Plan Land Use Designations

The proposed General Plan Land Use Map consists of 12 separate maps detailing land use in each of the City's planning areas (please refer to Chapter 1, Land Use, of the Draft Policy Document for the land use maps). The maps apply 14 land use designations (Table 2-2) to the land area *within* the RUL. Within these major land use categories, areas are further divided into smaller geographic units, or "pods," that specifically define the density and intensity of future development based on the character of the surrounding neighborhood. The four residential designations prescribe the neighborhood pattern that will be retained or encouraged in each area. To accomplish this, the residential typologies (shown in Appendix B of the Draft Policy Document) identify the architectural and urban pattern characteristic of each neighborhood and promote new residential development consistent with these attributes. The commercial and industrial designations focus on the provision of adequate lands for commerce and industry. Four other land use designations provide for unique community needs (e.g., downtown commercial, mixed uses, public services and recreation). ~~or recognize the need for more detailed area planning (Big Ranch Specific Plan).~~ Land outside the RUL is designated Greenbelt. Together, the land use designations provide opportunities for continuing development in a balanced community where residents have opportunities to both live and work, while having access to recreation, cultural, and open space amenities.

Economic Development

In the next 15 years, Napa is expected to rebound from the recession more quickly and stronger than other counties and is projected to add jobs at a faster rate than it is projected to add new workers who live in Napa. In its efforts to foster this economic development and to reduce the amount of commuting to and from the city, the Draft General Plan calls for attraction of higher paying technical and professional jobs, encouragement to business sectors that contribute significantly to the City's fiscal health (such as Auto Row), strengthening the physical connection between Downtown and Old Town and the Center for Wine, Food and the Arts, and promotion of the Downtown as a 24-hour destination, serving as a key element of the City's tourist economy as well as the City's regional/local retail and administrative center.

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Table 2-2
General Plan Land Use Designations

Residential Dominant Districts

SFR - Single Family Residential *(Generally 0-7 units per net acre)*

This designation provides for detached single family homes, secondary residential units, planned unit and cluster developments, mobile homes, manufactured housing, and compatible uses such as day care and residential care facilities. Non-residential uses may also be allowed in appropriate locations at the discretion of the City, including bed-and-breakfast inns and public and quasi-public uses of an administrative, educational, recreational, religious, cultural communications, or public service nature.

SFI - Single Family Infill *(Generally 3-8 units per net acre)*

This designation provides for detached and attached single family homes, secondary residential units, planned unit and cluster developments, duplexes, triplexes, mobile homes, manufactured housing, and compatible uses such as day care and residential care facilities. Non-residential uses may also be allowed in appropriate locations at the discretion of the City, including bed-and-breakfast inns and public and quasi public uses of an administrative, educational, recreational, cultural, communications, or public service nature.

TRI - Traditional Residential *(Generally 2-8 units per net acre)*

This designation provides for detached and attached single family homes, secondary residential units, planned unit and cluster developments, duplexes, triplexes, manufactured housing, live-work housing, and similar compatible uses such as day care and larger group quarters (e.g., residential facilities and nursing homes). Non-residential uses may also be allowed in appropriate locations at the discretion of the City, including bed-and-breakfast inns and public and quasi-public uses of an administrative, educational, recreational, religious, cultural, communications, or public service nature.

MFR - Multi Family Residential *(Generally 10-40 units per net acre)*

Allowable uses include attached single family homes, multi-family units, single room occupancy facilities, live-work housing, and similar compatible uses such as day care and larger group quarters (e.g., residential facilities and nursing homes). Non-residential uses may also be allowed in appropriate locations at the discretion of the City, including bed-and-breakfast inns and public and quasi-public uses of an administrative, educational, recreational, religious, cultural, communications, or public service nature.

Commercial Dominant Districts

TC - Tourist Commercial *(FAR no greater than 1.0)*

This designation provides for commercial retail and service uses oriented toward tourists and other visitors to the community. The designation includes destination-resort hotels, motels, and their recreational amenities, such as golf courses, tennis courts, and their related clubs and facilities. This designation also includes community and visitor-serving retail commercial, entertainment, restaurants, service stations, and similar compatible uses. Visitor-serving retail uses which emphasize the historic role of the Napa Valley in viticulture, such as wineries and wine centers, are also permitted.

Table 2-2 (continued)

General Plan Land Use Designations

Commercial Dominant Districts continued)

LC - Local Commercial *(FAR no greater than 0.35)*

This designation provides for commercial uses serving the daily needs of nearby residential neighborhoods, including retail and service uses, restaurants, and banks. These developments are smaller in size and architectural scale and should not create significant impacts on surrounding residential neighborhoods.

CC - Community Commercial *(FAR no greater than 0.40)*

This designation provides for commercial area serving multiple neighborhoods or the entire community, including retail and service uses, restaurants, banks, entertainment, and offices. These areas should primarily be developed in shopping center configurations or as infill commercial uses in established community commercial areas.

BP - Business Professional *(FAR no greater than 0.40, except in the Central Planning Area where maximum is 0.50)*

This designation provides for commercial office uses oriented to provision of business and professional services. Intensive residential uses may be allowed at appropriate locations at a density range of 10 to 40 units per acre. This designation is meant to encourage concentrations of administrative and professional offices, public and quasi-public uses, and similar compatible uses, such as retail commercial oriented to the needs of the adjacent businesses. Office areas near the Queen of the Valley hospital are reserved for medical/dental offices, medical laboratories, pharmacies, and similar related uses.

Industrial Dominant Districts

CP - Corporate Park *(FAR no greater than 0.40)*

This designation provides for manufacturing, warehousing, office, public and quasi-public uses, and similar compatible uses in a campus-like setting. Intensive industrial uses may be located in CP-designated areas subject to the special design considerations and other criteria that may apply to a specific corporate park. Development in this designation shall have integrated design requirements including extensive landscaping and unifying design features.

LI - Light Industrial *(FAR no greater than 0.50)*

This designation provides for small scale, manufacturing, fabrication, packaging, storage, equipment repair, and similar related uses. Also included are construction and maintenance yards, trade and technical training facilities, utility plants, and recycling centers and similar facilities. Non-industrial uses may also be allowed in appropriate locations at the discretion of the City, including live-work units and child care centers.

Special Purpose Districts

DC - Downtown Commercial *(FAR no greater than 2.00)*

This designation applies to the city's historic commercial area and provides for retail, administrative and other offices, institutional, recreational, entertainment, arts and cultural uses, hotels, conference facilities, transportation and communication facilities, public and quasi-public uses, and similar and compatible uses. Higher density residential/commercial uses are also permitted. Residential uses should range from 10 to 40 units per acre.

General Plan Land Use Designations

Special Purpose Districts (continued)

MU - Mixed Use *(Generally 10-40 units per net acre; FAR no greater than 1.00)*

This designation provides for creative infill projects that include the functional integration of retail commercial, office, or light manufacturing space possible with attached dwelling units. Residential densities shall range from 10 to 40 units per net acre. This designation is also intended to allow, at appropriate locations, cultural and entertainment uses that complement and support the downtown.

~~**BRSP - Big Ranch Specific Plan**~~

~~This designation applies to the Big Ranch area. All development under this designation shall be approved pursuant to an adopted specific plan. When the specific plan is approved, the BRSP designation shall be replaced by other land use designations. Prior to adoption and implementation of a specific plan, existing uses may be continued but new development is subject to a comprehensive environmental review. The predominant use will be residential~~

PS - Public Serving *(FAR no greater than 0.40)*

This designation provides for public and quasi-public sites dedicated to ~~unique~~ community-serving purposes, such as ~~fire and police stations, utility substations, secondary and middle schools, colleges, courts, jails, hospitals, major public utilities, and transportation facilities~~ government offices and related community service facilities, city-wide and community parklands, public schools of all levels and private schools with a significant enrollment, and public health facilities. This designation is also used to identify large tracts of privately owned undeveloped land with significant environmental limitations to development.

~~This designation provides for public and quasi-public sites dedicated to unique community-serving purposes, such as fire and police stations, utility substations, secondary and middle schools, colleges, courts, jails, hospitals, major public utilities, and transportation facilities. This designation also provides for major parks and large areas of open space in private ownership. These lands may be subject to deed restrictions which will maintain the land as open space. Lands with this designation may be used for outdoor recreation purposes, such as trails, nature study areas, environmental education centers, and related uses.~~

G - Greenbelt

This designation is applied to specific lands outside of the RUL that bear a relationship to the City's planning policies. Greenbelt lands that surround the RUL are to remain in agricultural or very low density rural residential, public or institutional use. The plan seeks to maintain these areas by providing adequate land and development potential within the RUL to accommodate anticipated growth to the year 2020.

Source: City of Napa Planning Department

1) Residential building intensities are expressed in terms of the number of dwelling units allowed per net acre. Net acreage refers to the land area excluding streets and rights-of-way.

2) Commercial and industrial building intensities are expressed in terms of Floor Area Ratios (FARs), the ratio of the gross building square footage on a lot to the net square footage of the lot.

Growth Forecasts for the Year 2020

Under the Draft General Plan, a total of 34,938 dwelling units at buildout could potentially be accommodated in the RUL, or 7,840 units more than those existing in 1994. Table 2-3 presents growth projections by planning areas. (The planning areas are illustrated in Figure 2-3.) These figures are based on a residential capacity analysis method developed by the Citizen Advisory Committee formed in February 1992. The method of analysis, which blends site-specific and generalized land use analysis

techniques, is described in Appendix C of the Draft Policy Document. At residential buildout, the RUL would accommodate a total population of approximately 81,100 (Table 2-4).

Additional commercial/industrial development in the RUL would support approximately 14,000 jobs, for a total of 42,700 jobs by the year 2020. These figures, as well as population and housing projections, are presented in Table 2-4.

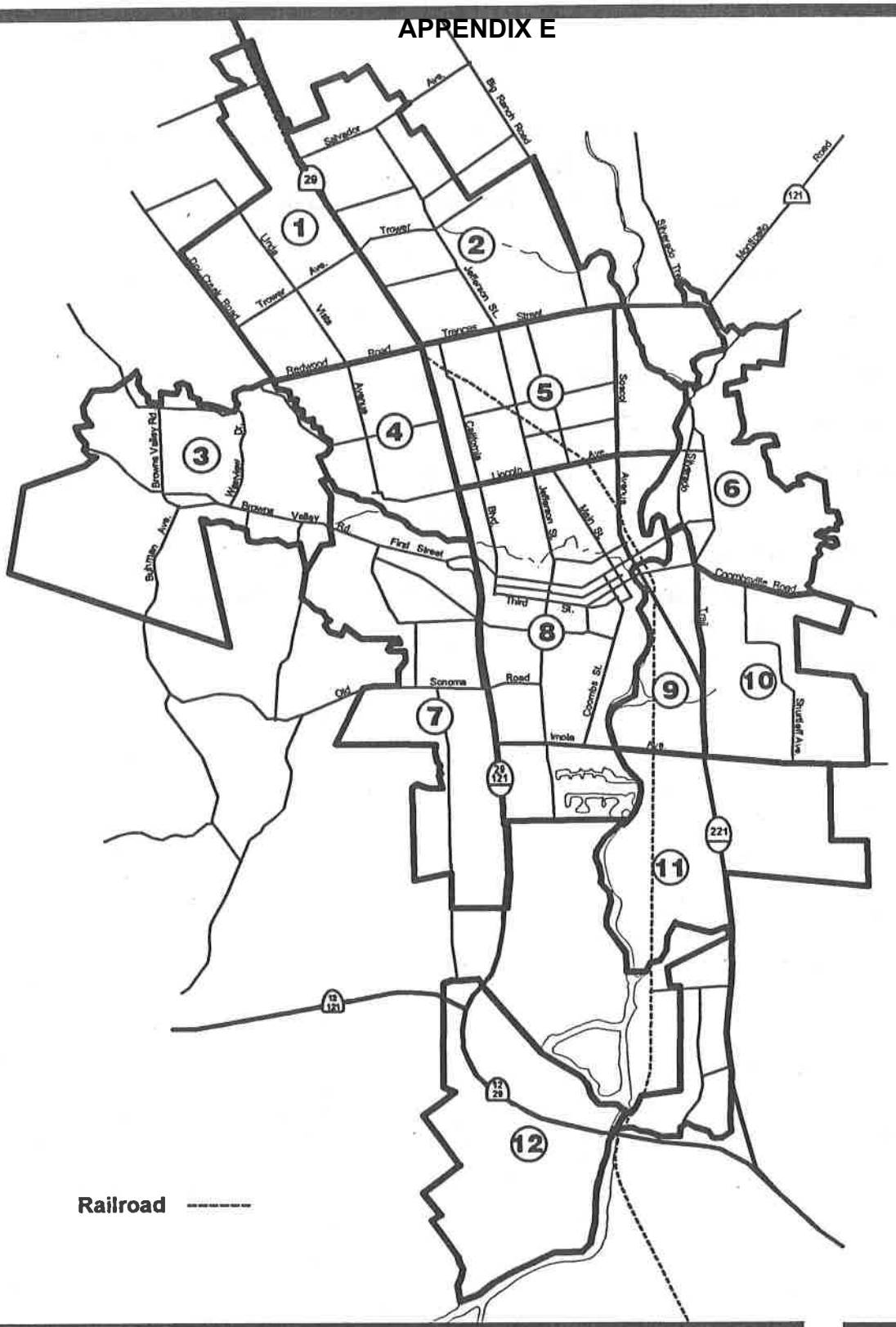
Table 2-3
Future Residential Development in Napa RUL by Planning Area

Planning Area	Existing Dwelling Units [1]	Additional Dwelling Unit Potential	Total Build Out Dwelling Units	Percent Increase
Linda Vista	2,752	1,277	4,029	46
Vintage	3,189	1,611	4,800	51
Browns Valley	2,329	609	2,938	26
Pueblo	2,157	212	2,369	10
Beard	3,884	623	4,507	16
Alta Heights	1,406	296	1,702	21
Westwood	3,301	927	4,228	28
Central Napa	5,765	844	6,609	15
Soscol	121	108	229	89
Terrace-Shurtleff	2,193	733	2,926	33
River East	0	0	0	0
Stanly Ranch	1	600	601	60,000
SUBTOTAL[1]	26,784	7,495	34,279	28
TOTAL[2]	27,098	7,840	34,938	29

Source: City of Napa Planning Department

1) Dwelling units located in residential land use categories only. Does not include residential uses in commercial and industrial land use categories or group homes.

2) Includes dwelling units in all land use categories.



City of Napa General Plan | Plandeir.DS4 | 6/97

Figure 2-4

Napa Planning Areas

North

725' 1/2 Mile 1 Mile 3 Miles

0

1. Linda Vista
2. Vintage
3. Browns Valley
4. Pueblo
5. Beard
6. Alta Heights
7. Westwood
8. Central Napa
9. Soscol
10. Terrace/Shurtliff
11. River East
12. Stanly Ranch

While every effort has been made to insure the accuracy of the information shown on this page, the City of Napa assumes no responsibility for liability from any errors or omissions.

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Table 2-4
Napa RUL Population and Employment Projections

Theoretical Land Use Capacity	1995	2000	2010	2020
Total Population [1]	69,700	72,300	76,700	81,100
Household Population	66,900	69,300	74,200	78,600
Total Dwelling Units [2]	27,400	28,400	30,300	32,000
Employed Residents	32,900	34,100	37,800	41,500
Total Jobs [3]	31,100	33,620	38,200	42,700

Source: City of Napa Planning Department

1) Total Population includes household plus residents in group quarters; 2.55 persons per household

2) Four percent city-wide housing vacancy rate applied

3) Total jobs includes Napa State Hospital (sphere of influence)

APPENDIX E

Chapter 3
Environmental Analysis

3.1 INTRODUCTION

This chapter presents a comprehensive assessment of the environmental impacts associated with adoption of the Draft Napa General Plan. The environmental topics covered include those identified in the CEQA Environmental Checklist Form, such as land use, transportation, visual quality, biological resources, water resources and water quality, etc. For each environmental issue, this EIR contains three sections:

- **Existing Conditions** – This section summarizes existing baseline conditions for each environmental issue.
- **Significance Criteria** – This section defines thresholds which, if exceeded as a result of the proposed project, would result in significant or potentially significant impacts.
- **Environmental Analysis** – This section evaluates how the proposed project would affect baseline conditions and the magnitude of the change (or impact) relative to the significance criteria.

This EIR defines two types of impacts prior to the implementation of any recommended mitigation measures: significant and insignificant.

- Significant impacts include beneficial (B) and adverse (S) effects that exceed established or defined thresholds. For example, air emissions that exceed federal ambient air quality standards or elimination of a rare or endangered species habitat would be considered significant adverse impacts.
- Insignificant impacts (I) include beneficial and adverse effects that are noticeable but do not exceed established or defined thresholds. For example, changes in ambient noise levels of three decibels would be perceptible but would not represent a significant change in noise levels. ~~Similarly, if the wastewater service demands of a proposed project could be accommodated by the treatment plant, then the effect would be considered insignificant.~~

Each distinct impact discussion in the following sections is numbered and prefaced by an italicized impact statement that highlights the impact and the classification of the impact (i.e., S, I, or B). The discussion following each summary statement provides an analysis of the impact and a rationale for the significance classification.

Mitigation measures are presented after impacts that are classified as significant. These measures seek to minimize, alleviate or avoid significant adverse effects. Mitigation measures include policies and implementation programs already included in the Draft General Plan, standard mitigation measures contained in the City's Policy Resolution No. 27 which are required of all development projects proposed in the City, and additional measures recommended by City staff for consideration. In cases where the General Plan policies and implementation programs provide mitigation, they are identified using the same reference numbers as found in the Draft General Plan. Each mitigation measure is also numbered for easy reference. The numbering convention also links the mitigation to the impact it addresses. Thus, Mitigation Measure 2.1 refers to the first mitigation measure for Impact 2; Mitigation Measure 2.2; the second measure; etc. If the mitigation measures would not successfully minimize the effects to a less than significant level, the EIR classifies these impacts as "unavoidable significant" effects.

APPENDIX E

3.2 LAND USE

Existing Conditions

The City of Napa Rural Urban Limit (RUL) covers approximately 11,650 acres, encompassing primarily urban uses. In 1992, the City conducted a detailed land use and land availability inventory. Table 3.2-1 summarizes the existing land uses within the RUL. These land uses are generally described below.

Table 3.2-1
Existing (1992) Land Uses in the RUL

General Land Use	Acres	Percent of RUL
Residential	7,856	67 %
Commercial	963	8 %
Industrial	454	4 %
Parks/Public/Quasi-public	1,343	12%
Undeveloped/Agricultural	1,037	9 %
Total	11,653	100 %

Source: City of Napa Planning Department.

Residential Development

Of the City's 26,577 homes (1995), 62 percent are single family detached homes, 25 percent are multiple family units, 7 percent attached single family homes and another 5 percent are mobile homes. The city's housing stock ranges from the merchant mansions built in the late 1800's in the "Old Town" area near downtown; to the working class cottages of the early 1900's; to the traditional ranch-style subdivisions of the 1950's and 60's; to the large, custom homes of the 1990's. Multi-family housing is found in areas scattered through much of the city, with most concentrated along major streets such as Soscol and Freeway Drive. Mobile home parks are also found throughout the city as are a variety of residential care facilities for the elderly.

Approximately 5,000 multi-family dwelling units exist within the Planning Area. A considerable number of higher density units exist east of Franklin Street in the Central Napa Planning Area. In addition, medium density development consisting of duplexes and triplexes, many of which were converted from older single family homes, is relatively abundant in the northern portion of the Central Napa Planning Area. Land currently designated for residential uses totals approximately 7,856 acres, or 67 percent of land within the RUL.

Multi-family projects have recently been developed in the Westwood Planning Area south of Imola, north and south of First Street near SR 29, and along Soscol, Lincoln, Central, and Pueblo Avenues in the Beard Planning Area. A few multi-family projects and a mobile home park are located in the northern portion of the Vintage Planning Area and along Solano Avenue in the Pueblo Planning Area. In addition, the Alta Heights and Terrace Shurtleff Planning Areas include several areas where duplex and triplex housing is concentrated.

Commercial Development

In addition to the commercial activity in the Downtown, other significant general and tourist commercial areas are located along major arterials, including Trancas Street, Soscol Avenue, Lincoln Avenue, and Imola Avenue West. A mix of tourist and commercial uses can also be found along the east and west sides of the Napa River, from Lincoln Avenue to the north to Imola Avenue to the south. Commercial development along Jefferson Street is dominated by aging linear office/retail (i.e., strip commercial) uses. Commercial uses, including retail and service uses (medical and real estate offices, barber shops and the like) and various types of other commercial uses (wholesale, food processing, etc.), are designated for approximately 963 acres, or 8 percent of the land within the RUL.

Industrial Development

Most industrial development in Napa is in the southern part of the City, in or near the Napa Valley Corporate Park. Other major industrial and heavy commercial areas occupy land along the east and west sides of SR 29 south of First Street, and between Soscol Avenue and the Napa River. A light industrial area straddles the railroad tracks at California Boulevard near SR 29 and Trancas Street. Antiquated industrial and heavy commercial uses, which once included tanneries, are also located between the Napa River and Coombs Street near Spruce Street, and west of Soscol Avenue south of Lincoln Avenue. Approximately 454 acres, or 4 percent of the land within the RUL, is currently designated for industrial uses.

Parks and Public/Quasi Public

These areas include parks, City and County buildings, schools, transportation facilities, hospitals, and utilities and total approximately 1,343 acres, or 12 percent of City land.

City parks and recreation facilities are located throughout the City, with the larger citywide recreational areas found at the City boundaries to the west and south. Approximately 753 acres of parkland occur within the City and 588 acres are located with the RUL (Alston Park is outside the RUL). Existing regional parks in the City include Alston, Kennedy, Westwood Hills and Timber Hill parks. Four community parks, Century Oaks, Fuller, Garfield, and Las Flores, are located in the City, totaling approximately 46 acres. Neighborhood parks comprise the balance of parkland within the City.

Undeveloped and Agricultural Lands

Undeveloped land includes vacant and underutilized sites within the RUL, some of which may be marginally used for agriculture. When combined, this acreage totals approximately 1,037 acres. However, only about half is considered suitable for development due to environmental constraints.

The largest vacant and underused sites of this type are generally located on the periphery of the city, in areas such as Stanly Ranch, Foster Road, Big Ranch Road, Wyatt Road, and the Browns Valley hills. Smaller sites, generally less than one acre in size, are scattered throughout the city. Usable acreage does not include environmentally sensitive areas or waterbodies since those areas are generally not considered suitable for development. This reduces the amount of vacant, usable land to less than five percent of the total RUL.

Because the city is nearly built out, only a few large vacant sites remain within the RUL. When land in short-term agricultural use is factored in, several additional sites are added to the inventory of "vacant" lands potentially available for development. With the addition of agricultural and grazing lands within the RUL, a significant number of sites are considered underused (i.e., acreage parcels over one acre with at least one existing dwelling).

Overall, the city of Napa is occupied with primarily urban uses, although land used for agricultural production and grazing can be found to the south in the Stanly Ranch and Westwood Planning Areas. Elsewhere in the city, pockets of intensive, short-term agricultural use remain in the Vintage, Beard, and Terrace Shurtleff Planning Areas. The surrounding urban pattern generally precludes viable production on these randomly located parcels within the RUL.

Please see Chapter 1, Land Use, of the Draft General Plan Background Report for further discussion of specific land uses within the 12 planning areas of the RUL.

Impact Assessment and Mitigation

Significance Criteria

The proposed project would result in significant land use and planning impacts if the proposed uses:

- substantially alter the type or intensity of land use on a proposed site, causing it to be incompatible with surrounding land uses or the overall character of the surrounding neighborhoods;
- convert prime agricultural land to non-agricultural use or impair the agricultural productivity of prime agricultural land pursuant to CEQA Guidelines, Appendix G (y); or
- conflict with applicable, adopted environmental plans and goals pursuant to CEQA Guidelines, Appendix G (a~~).~~

Regarding the second criterion, this EIR considers conversion of economically viable ~~important farmlands~~ prime agricultural land to non-agricultural uses as a significant effect. On the other hand, conversion of small agricultural plots not on prime agricultural soils when contiguous with urban development is considered ~~adverse but not~~ less than significant.

Environmental Analysis

1. *Future development in Napa would be compatible with existing development within the RUL. In addition, some existing development that is incompatible with surrounding uses would be replaced or would be required to meet applicable standards to ensure its consistency with nearby uses. (B)*

As unincorporated lands within the RUL are annexed and the existing urban area continues to infill over the coming decades, the potential for localized land use conflicts is likely to increase. However, the City has included goals, policies, and implementation measures in the General Plan that minimize this potential by requiring that new development be compatible with surrounding uses. Moreover, the proposed General Plan includes measures that would encourage the replacement of existing uses that are currently incompatible with nearby development. These measures are primarily contained in the Land Use Element.

One of the goals of the Land Use Element provides that new development be consistent with the City's character and urban form (Goal LU-4). Accordingly, while the proposed General Plan would emphasize infill development, increasing the density of development within the City, both the new and infill development would be compatible with surrounding development and would not significantly increase the intensity of development within the City. To ensure compatible development in residential neighborhoods, the City would implement residential pattern guidelines and minimum densities (Policy LU-4.1). Development of attached units in the Single Family Infill and Traditional Residential land use designations would be allowed only where such units are compatible with the design characteristics of surrounding residential units (Policy LU-4.5). Where incompatible land uses are identified in residential areas, they would be eliminated through targeted code enforcement and other available regulatory measures, such as enforcement of the City's nuisance abatement ordinance (Policy LU-4.9).

Expansion of commercial uses adjacent to residential areas would only be permitted where such use is compatible and would be appropriately buffered (Policy LU-5.4), and tourist commercial uses will be allowed only where it will not adversely affect existing residential, office, or neighborhood commercial development (Policy LU-5.6).

Industrial uses that are inappropriately located would be encouraged to be replaced and redeveloped with land uses consistent with the goals and standards of the General Plan (Policy LU-7.2). Industrial development would be required to be designed and operated to minimize nuisances on adjacent uses, such as noise, heat, glare, dust, and air emissions (Policy LU-7.4).

2. *The continued support and maintenance of the RUL to define the City's urban growth boundaries would minimize disturbance to the region's rich natural resources. (B)*

The Napa Valley contains significant open space and agricultural resources. This scenic rural setting is characterized by vineyards and small farms to the north of the RUL, wooded foothills and rolling grasslands to the east and west of the RUL, and marshlands, grazing lands, and vineyards to the south of the RUL. Without strong policies to maintain this urban/rural boundary, urban development could extend outward and threaten these resources. Chapter 9 of the Draft General Plan (in Policy A-2.1) stipulates that additions to the RUL must meet the five findings of the County Measure J growth management initiative and be contiguous to the existing RUL. Findings that must be made include the suitability of the land for urban development, the lack of Class I and II soils or active agricultural uses, and the presence of natural features that would act as a buffer between urban and rural uses.

To prevent conflicts between residential uses on the periphery of the RUL and productive agricultural land outside the RUL, the proposed General Plan would establish a buffer at the urban/rural boundary (Policy LU-3.2). In addition, the City would "feather" new residential

development near the RUL, especially toward land in agricultural production, so that the density of residential development would progressively decline within a quarter-mile of the RUL (Policy LU-3.3).

3. *Under the* Draft General Plan ~~*proposed project*~~*, the RUL would be expanded by approximately 440 acres. The majority of the new land to be included in the RUL is already urbanized (more than 400 acres) and the remaining portion is vacant or underutilized. Therefore, the project would not induce sprawl or the premature conversion of agricultural land. (I)*

The City proposes to adjust the existing RUL, the urban growth boundary, to improve the boundary's "defensibility" as land supply continues to diminish over the coming decades. The largest of the areas is a 387-acre portion of the River East Planning Area containing the Napa State Hospital. This area is already occupied with urban uses, so that the expansion of the RUL here would not result in expansion of the urban area beyond what currently exists.

A second area, located in the northeast corner of the Big Ranch Road/Trancas Street intersection, consists of approximately 40 acres of vacant land, with some rural residential homes interspersed throughout the area. The third, much smaller area, approximately 13 acres, is west of Foster Road in the Westwood Planning Area and is currently vacant. Both of these areas are adjacent to urban development and services would not need to be extended to developable land, thereby creating secondary development pressures. Infrastructure planning for the Big Ranch site would be phased and financed in accordance with the Big Ranch Specific Plan adopted in October 1996 to be prepared. Development potential on the Foster Road site would be less than 26 dwelling units.

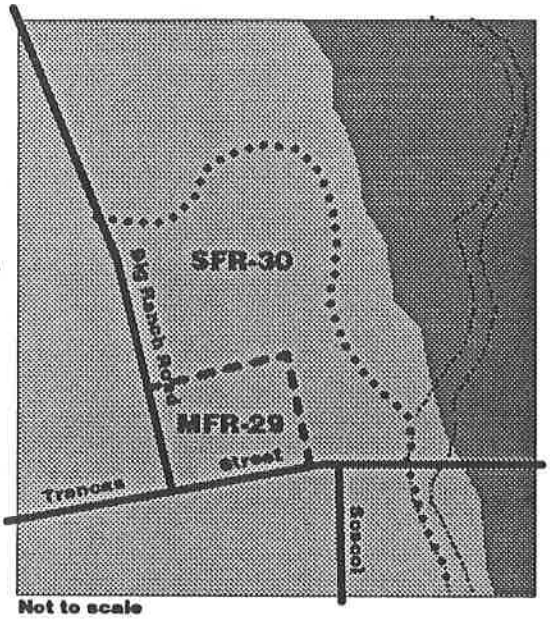
The fourth area is a 5 acre parcel at the northeast corner of Silverado Trail and Trancas St. that has legally been a part of the city since 1973 and is designated in the Draft General Plan as Tourist-Commercial.

Beyond these proposed changes to the RUL, the City intends to retain the RUL virtually unchanged for the next 25 years. The Draft General Plan contains policies to preserve surrounding open space lands outside the RUL primarily for agriculture and other resource and open space uses. To achieve the goal of containing urban growth within the RUL, the City will cooperate with the County and neighboring cities. As noted above under Impact 2, in the event that a General Plan amendment is proposed to adjust the RUL, Chapter 9, Administration, of the Draft General Plan Policy Document establishes a set of criteria that must be satisfied to ensure that any future expansions of the RUL are consistent with City and County goals for environmental protection and growth management (Policy A-2.1).

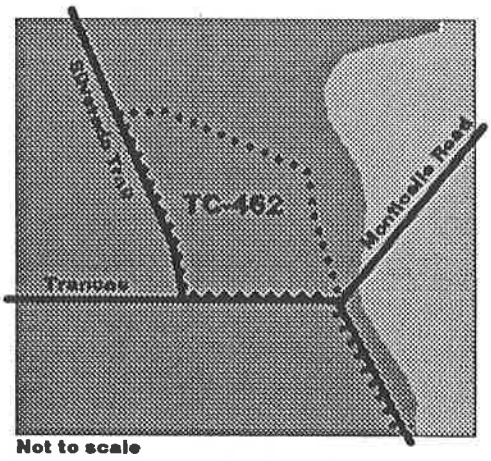
4. *Development associated with the Draft General Plan would result in the conversion of* ~~*random parcels of*~~ *prime agricultural soils within the City's RUL to urban uses.* ~~*(I)*~~ *(S)*

A number of vacant and underutilized parcels currently used for agricultural and grazing purposes are located on the periphery of the city, in areas such as Stanly Ranch, Foster Road, Big Ranch Road, Wyatt Road, and the Browns Valley hills. Smaller sites, generally less than one acre in size, are scattered throughout the city. Some of these vacant and underused lands are underlain by prime agricultural soils (rated as Class I and Class II soils by the U.S. Soil Conservation Service), which are located throughout a large central portion of the RUL (see Figure NR-3 of the Draft General Plan Background Report for the distribution of soils classifications through the RUL). While not all of

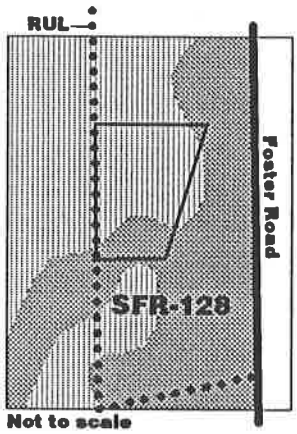
APPENDIX E



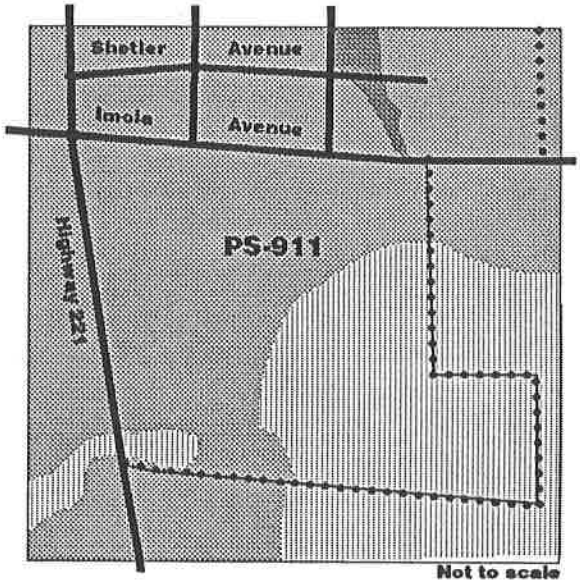
Trancas/Big Ranch Road
40 acres



Trancas/Silverado Trail
5 acres



Foster Road
13 acres



Napa State Hospital
387 acres

City of Napa General Plan | rulextra.ds4 | 7/97

Figure - 3.2-1

RUL Adjustment Areas - Soils

North

Soils-

Class I & II:

Class III & IV:

Class V - VIII:

Source: County of Napa Planning Department

While every effort has been made to insure the accuracy of the information shown on this page, the City of Napa assumes no responsibility for liability from any errors or omissions.

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this land would be converted to urban uses due to environmental constraints such as floodplain, hillsides, and wetlands, more than half of this land would be converted to urban uses.

~~The loss of randomly located, vacant land within the RUL which may have agricultural soils is considered insignificant when considered in the context of the greater Napa Valley and the long-term benefits of agricultural land preservation county wide that is achieved by the policies of the General Plan. The General Plan focuses development within the RUL, thereby protecting agricultural and open space land from regional development. There are two additional reasons why the conversion of these isolated agricultural lands to urban uses would not be significant. First, the vast majority of these lands are private landholdings eligible for future development consistent with the land use policies of the General Plan and zoning. Second, the land use proposals of the General Plan were defined through an extensive community participation effort. Consequently, the recommended land use pattern is an expression of the collective vision of the community. Thus, the conversion of vacant and rural lands within the RUL to more intensive, urban uses is consistent with their inclusion in the RUL. Figure NR-4 of the Draft General Plan Background Report shows how carefully the RUL has been defined, especially on the north and west, to *avoid* areas that are intensive in agricultural production.~~

The loss of small, randomly located, vacant parcels within the RUL that have agricultural soils is considered insignificant. However, the loss of larger parcels with prime agricultural soils (Classes I and II) is considered significant.

Of the vacant lands underlain by Class 1 and Class II soils, none appear to be greater than 10 acres or contiguous with larger cultivated areas (as determined by comparing Figure LU-6, Existing Land Uses, with Figure NR-3, Soils Capability Classes for Croplands, both in the Background Report).

The loss of these prime soils is offset in part by General Plan policies that focus development within the RUL, thereby protecting significant tracts of agricultural and open space land outside the RUL from development and growth pressures.

~~Given the long-standing use of the RUL to protect large, actively cultivated areas, the absence of any new agriculturally productive lands being proposed for inclusion in the RUL, and limited, isolated acreages of vacant or underused land, underlain by prime agricultural soils, the impacts of the Draft General Plan on agricultural uses and resources are considered insignificant.~~

5. *The proposed land uses would accommodate a household population and workforce generally consistent with regional growth projections. (I)*

The Association of Bay Area Governments (ABAG) prepares biannual growth projections for the Bay Area. The most recent set of forecasts, *Projections '96,* anticipates that the number of households in the City of Napa will increase to 33,520 in 2015, a total growth of 6,420 dwelling units. This growth is consistent with the City's projected residential development in 2020 of 34,938 units.

Projections '96 estimates that the total jobs in the City of Napa will grow from 27,270 to 38,970 between 1995 and 2015, an increase of 11,700 jobs. Under the proposed General Plan, the City projects a comparable increase in jobs of 11,600, from 31,100 in 1995 to 42,700 in 2020.

While *Projections '96* is the most current forecast, it should be noted that *Projections '94* was used during preparation of the 2020 figures for the Draft General Plan (please see Table 1 on page 9 of the Draft Policy Document). Since ABAG figures were not available for the years 2015 or 2020 from *Projections '94*, the City estimated dwelling unit and job growth based on capacity and other limitations related to local policies and growth trends. Although, *Projections '96* estimates slightly more growth than *Projections '94*, the overall growth trend is not significantly altered and results in roughly the same projection for the 25-year period of the Draft General Plan.

6. *The Draft General Plan would generally be consistent with and reinforce the adopted environmental plans and goals of other local and regional jurisdictions. (B)*

The County designates lands surrounding the City's RUL for agriculture, watershed, or open space. The predominant land use activity is either agriculture or resource conservation. By clearly defining the long-term urban growth boundary mutually accepted by the City and County, the RUL alleviates premature development pressures to convert these lands to urban uses. The Napa Draft General Plan continues this long-upheld policy. ~~The proposed expansion of the RUL would not adversely affect natural resource areas, as explained above under Impacts 2 and 4.~~

The County Airport Land Use Commission is responsible for adopting an Airport Land Use Compatibility Plan (ALUCP) that addresses future airport growth and land use measures to minimize the public's exposure to excessive noise and safety hazards around airports. The Napa County ALUCP was adopted in 1991 and its planning area encompasses nearly all of the City's Stanly Ranch Planning Area and the southern portion of the River East Planning Area. The proposed project requires that development within the ALUCP planning area be reviewed by the Airport Land Use Commission for consistency with the ALUCP (Policy HS-6.1). The Draft Plan further stipulates that land uses be restricted and safety standards be imposed in accordance with the ALUCP. The Draft Plan is therefore consistent with and supportive of the environmental policies of the ALUCP.

3.3 TRANSPORTATION

Existing Conditions

The City of Napa's transportation system is well developed and is built out to its maximum requirements in most locations. Due to its relative distance from the major Bay Area commuter corridors and due to its relatively slow growth, Napa has escaped the overwhelming burdens of traffic congestion that are commonplace during rush hours in most California urban areas. Overall, Napa's streets are relatively uncongested.

Traffic conditions and impacts are assessed using the concept of level of service, a qualitative measure describing operational conditions within a traffic stream and their perception by motorists and passengers. The level of service generally describes these conditions in terms of speed and travel time, delay, freedom to maneuver, traffic interruptions, comfort and convenience, and safety. It is rated on a scale of Level of Service (LOS) A to LOS F, where LOS A represents free flow conditions and LOS F represents highly congested conditions (see Table 3.3-1a and 3.3-1b). *Chapter 3, Transportation, of the Draft General Plan Background Report contains traffic diagrams showing traffic patterns on major thoroughfares, including State routes, and intersection levels of service.*

Table 3.3-1a
Level of Service Definitions
Signalized Intersections

LOS	Stopped Delay (sec/veh)	V/C Ratio	Description of Traffic Condition
A	$\leq$ 5.0	0.00 - 0.60	Insignificant Delays: No approach phase is fully utilized and no vehicle waits longer than one red indication.
B	5.1 - 15.0	0.61 - 0.70	Minimal Delays: An occasional approach phase is fully utilized. Drivers begin to feel restricted.
C	15.1 - 25.0	0.71 - 0.80	Acceptable Delays: major approach phase may become fully utilized. Most drivers feel somewhat restricted.
D	25.1 - 40.0	0.81 - 0.90	Tolerable Delays: Drivers may wait through more than one red indication. Queues may develop but dissipate rapidly, without excessive delays.
E	40.1 - 60.0	0.91 - 1.00	Significant Delays: Volumes approaching capacity. Vehicles may wait through several signal cycles, and long queues of vehicles form upstream.
F	$\geq$ 60.0	NA	Excessive Delays: Represents conditions at capacity, with extremely long delays. Queues may block upstream intersections.

Delay is a measure of driver discomfort, frustration, fuel consumption, and lost travel time. Specifically, level of service criteria are stated in terms of the average stopped delay per vehicle for a 15 minute analysis period.

Source: *Highway Capacity Manual*, Special Report No. 209. Transportation Research Board, 1985.
Note: sec/veh = seconds per vehicle

Table 3.3-1b
Level of Service Definitions
Unsignalized Intersections

Reserve Capacity (PCPH)	LOS	Expected Delay to Minor Street Traffic
≥ 400	A	Little or no delay
300-399	B	Short traffic delays
200-299	C	Average traffic delays
100-199	D	Long traffic delays
0-99	E	Very long traffic delays
*	F	*

Source: San Francisco Department of Public Works, Traffic Division, Bureau of Engineering.

Note: PCPH is passenger car equivalents per hour.

* When demand volume exceeds the capacity of the lane, extreme delays will be encountered with queuing which may cause severe congestion affecting other traffic movements in the intersection. This condition usually warrants improvement to the intersection.

The "Existing" column in Table 3.3-2 shows 1992 levels of service at representative intersections throughout the city and its immediate environs, as calculated by the City's transportation consultant, Dowling Associates. As these data indicate, five intersections currently operate at unacceptable levels: State Road (SR) 221 at SR 29 (located outside the City's jurisdiction), Soscol Avenue at Kansas Avenue (unsignalized in 1992), Trancas Street at SR 29, Trancas Street at SR 121, and Wine Country Avenue at SR 29. In addition, the unsignalized intersection of Sierra Avenue at SR 29 experiences unacceptable levels of service. The analysis has been performed for the P.M. peak period when demand on the local streets and intersections is heaviest and the circulation system is most constrained.

Transit service in Napa and throughout Napa County is provided by two transit systems, Napa Valley Intracity Neighborhood Express and Napa Valley Transit. The former system operates five routes serving most of the city's trip generators. Routes are within 1/4 mile of 85 percent of the residences and within 1/8 mile of 90 percent of the major activity centers. In addition, a number of bicycle facilities are located throughout the city. *Please refer to Chapter 3, Transportation, of the Draft General Plan Background Report for further discussion of transportation facilities and services in the RUL.*

Impact Assessment and Mitigation

Significance Criteria and Methodology

Methodology. An analysis of future p.m. peak hour levels of service was performed for intersections illustrated throughout the city. For the signalized study intersections, future service levels were analyzed using the 1985 Highway Capacity Manual (HCM) operations method. Standard HCM default values were used. The level of service for signalized intersections is based on the average delay to the entire intersection, as defined in Table 3.3-1a. The Draft General Plan Policy Document places primary importance on signalized intersections and street segments (Policy T-2.3). The future levels of service for stop-controlled intersections were analyzed using the method prescribed in the 1985 Highway Capacity

Table 3.3-2
Intersection Levels of Service
(P.M. Peak Hour)

Intersection	Existing			2020 Without Roadway Improvements			2020 With Roadway Improvements		
	LOS	Delay	V/C	LOS	Delay	V/C	LOS	Delay	V/C
Signalized Intersections									
First St at California Blvd	D	25.1	0.91	F	174	1.118 [1]	C	23.0	0.91
First St at Jefferson St	B	13.6	0.67	C	19.6	0.902	C	17.4	0.85
First St at Silverado Trail	B	7.5	0.53	B	9.9	0.665	B	8.9	0.64
First St at Soscol Ave	B	12.0	0.55	B	13.5	0.728	B	12.2	0.61
Imola Ave at South Coombs St	C	24.4	0.86	D	39.2	1.019	C	21.6	0.79
Imola Ave at South Jefferson St	C	15.2	0.49	C	16.6	0.631	C	16.9	0.66
Lincoln Ave at California Blvd	C	20.0	0.81	D	33.7	0.992	C	16.9	0.78
Lincoln Ave at Jefferson St	C	17.3	0.77	C	19.4	0.84	C	16.5	0.66
Lincoln Ave at Silverado Trail	B	13.2	0.44	B	15	0.746	B	15.0	0.64
Lincoln Ave at Soscol Ave	C	19.4	0.88	E	53.5	1.103	D	28.0	0.98
Pueblo Ave at Jefferson St	C	16.9	0.58	C	15.8	0.612	C	15.4	0.50
SR 121 at SR 29	D	26.4	0.98	F	76.9	1.23	D	31.8	1.01
SR 221 at SR 29	F	61.3	0.96	F	216.8	1.217	F	227.8	1.23
Salvador Ave at SR 29	B	6.8	0.52	B	7.4	0.667	B	8.1	0.75
Second St at Jefferson St	B	9.0	0.43	B	10.4	0.667	B	11.1	0.58
Second St at Main St	B	7.2	0.37	B	7.1	0.367	B	7.0	0.36
Soscol Ave at Imola Ave	D	25.1	0.88	F	77.4	1.125	C	17.9	0.72
Soscol Ave at Kansas Ave [2]	F	-	-	B	13.3	0.836	B	11.5	0.74

Table 3.3-2 (continued)
Intersection Levels of Service
(P.M. Peak Hour)

Intersection	Existing			2020 Without Roadway Improvements			2020 With Roadway Improvements		
	LOS	Delay	V/C	LOS	Delay	V/C	LOS	Delay	V/C
Soscol Ave at Silverado Trail	C	23.9	0.94	**F**	**613.5**	**1.674**	C	15.3	0.90
Third St at Jefferson St	B	12.6	0.39	B	11.8	0.411	B	11.5	0.38
Third St at Main St	B	8.9	0.60	B	8.8	0.717	B	10.2	0.73
Third St at Silverado Trail	B	13.2	0.78	**F**	**77.8**	**1.196**	D	36.3	1.05
Third St at Soscol Ave	B	14.8	0.56	C	21.1	0.848	C	21.4	0.84
Trancas & SR 29 (Existing)	**E**	**59.0**	**0.98**	**F**	**128.7**	**1.176**	-	-	-
Trancas & SR 29 NB Ramps (Future Interchange)	-	-	-	-	-	-	B	12.2	0.75
Trancas & SR 29 SB Ramps (Future Interchange)	-	-	-	-	-	-	C	23.5	0.83
Trancas St at Big Ranch Rd [3]	B	13.7	0.57	C	16.1	0.759	D	37.3	1.00
Trancas St at California Blvd	B	6.8	0.59	B	6.7	0.554	B	7.4	0.61
Trancas St at Jefferson St	C	18.7	0.50	C	18.9	0.595	C	17.9	0.57
Trancas St at SR 121 [2,3,4]	**F**	-	**1.67**	**F**	**OVRFL**	**2.687**	D	38.1	1.05
Trancas St at Silverado Trail	C	15.3	0.55	C	19.8	0.828	C	17.4	0.72
Trancas St at Soscol Ave	B	14.1	0.66	C	17.5	0.821	B	13.3	0.58
Trancas St at Villa Lane	B	7.2	0.40	B	7.9	0.518	B	8.8	0.63
Trower Ave at SR 29	C	17.1	0.81	**F**	**86.8**	**1.165**	C	23.2	0.93
Wine Country Ave at SR 29	**F**	-	-	**F**	-	-	B	13.2	0.93

Table 3.3-2 (continued)
Intersection Levels of Service
(P.M. Peak Hour)

Intersection	Existing			2020 Without Roadway Improvements			2020 With Roadway Improvements		
	LOS	Delay	V/C	LOS	Delay	V/C	LOS	Delay	V/C
Stop-Sign Controlled Intersections in 2020									
El Centro Ave at Big Ranch Rd	A	-	-	A	-	-	A	-	-
Garfield Ln (E) at Villa Ln (Future Intersection)	-	-	-		-	-	A	-	-
Garfield Ln (W) at Villa Ln (Future Intersection)	-	-	-		-	-	A	-	-
Garfield Ln at Big Ranch Rd	A	-	-	B	-	-	B	-	-
Rubicon Ln at Big Ranch Rd (Future Intersection)	-	-	-	A	-	-	A	-	-
Rubicon St at Jefferson St	E	-	-	E	-	-	E	-	-
Sierra Ave at Jefferson St	D	-	-	E	-	-	E	-	-
Sierra Ave at SR 29	F	-	-	F	-	-	F	-	-
Trower Ave at Jefferson St	D	-	-	**F**	-	-	E	-	-

Source: Dowling Associates

(1) **Bold underlined** values indicate unacceptable intersection operations.

(2) Stop-controlled intersection in 1992; proposed to be signalized.

(3) Due to the potential variation in the 25-year 2020 projection and given the context of the scope of the General Plan Traffic model, the 2020 LOS for this intersection is essentially mitigated to mid LOS D.

(4) This is a stop-controlled intersection that can be mitigated for a mid LOS D with a signal and minor widening.

OVRFL Very large number.

Note: For purposes of analysis, the 2020 LOS conclusions assumed Soscol Avenue at 6 lanes. Implementation Program T.1-A in the Draft Policy Document calls for the reservation of right-of-way to provide for 6 lanes. Dowling Associates has indicated that traffic projections over a 25-year time frame along with other variables such as driver choice, timing of development, and construction of traffic improvements make it difficult to determine when and if this level of improvement may be necessary. Monitoring and planning for the possible need of 6 lanes is therefore an appropriate level of mitigation at this time.

Manual. The assessment considered all minor movements (vehicles on the side street and left turns from the major street), but the intersection service level is based on the worst case among all of the minor movements.

The following intersection improvements were assumed for modeling purposes and included in the "2020 with Roadway Improvements" data set in Table 3.3-3.

- State Route 29/Wine Country: add new signal *(under construction - 1997)*;
- State Route 29/Trower: add one through lane northbound and southbound; add a second northbound left-turn lane;
- State Route 29/Trancas: add interchange, including realignment of California Boulevard to meet the shopping center entrance (the latter required by the interchange project);
- Trancas Street/SR 121 (Silverado Trail South): add traffic signal;
- First Street/California Boulevard: add eastbound left turn lane;
- Lincoln/Soscol, First/Soscol, Third/Soscol, Silverado/Soscol, and Imola/Soscol: widen Soscol to six lanes;
- Imola/Coombs: as part of bridge widening, create approach with one left, two through lanes each way;
- SR29 at SR12/121: widen approach to three through lanes each way;
- Soscol/Kansas: add signal; widen Soscol to six lanes; and
- Soscol/Imola: as part of widening Imola, widen east and westbound approaches to two through lanes each way.

The Napa County Travel Forecasting Model was run by Dowling Associates for two separate scenarios to indicate the impacts of land use and roadway improvements on the roadway system. The model examines travel demand impacts during the weekday P.M. peak period only because this is when demand is greatest and would have the most severe effects on the circulation system. Other time periods, such as the morning peak periods and weekends, are important but not as critical in planning the City's street network. The first modeling effort analyzed the effects of the proposed General Plan land uses at buildout in 2020 on the existing (1992) street and highway network. Relevant components of the Metropolitan Transportation System for Napa County (as defined by the Metropolitan Transportation Commission) are included in this network. The results of this analysis were used to identify improvement projects that may be necessary over the next 25 years to maintain the level of service standards established in the proposed General Plan. These improvements, which include road widenings, extensions, and projects identified in the Regional Transportation Plan, were subsequently incorporated into the Draft General Plan and are summarized in Table 3.3-3 and shown on Figure 3-2 of the Draft Policy Document. The second forecast assigned the 2020 traffic volumes to the proposed street and highway network.

Significance Criteria. CEQA Guidelines, Appendix G (1), suggest significant impacts be defined when an increase in traffic is substantial in relation to the existing traffic load and capacity of the street system. For purposes of this EIR, the following criteria have been applied to define significant impacts:

Table 3.3-3
Future Roadway Improvements

	Roadway Segment	Improvement
1	Wine Country Ave.	Complete missing segment west of Linda Vista Ave. (Policy T-1.9j)
2	SR 29 north of Trancas St.	Widen at its approach to Trower Ave. (Implementation Program T-1.Ad)
3	Trower Ave.	Extend east to Big Ranch Rd. ~~south to Garfield Ln.~~ (Policy T-1.9g)
4	Sierra Ave.	Extend east to Salvador Channel ~~and connect with Garfield Ln.~~ (Policy T-1.9h)
~~5~~	~~Villa Ln.~~	~~Extend north and connect to Sierra/Garfield (Policy T-1.9i)~~
~~6~~ 5	Big Ranch Road	Extend south and connect with Soscol Ave. (Policy T-1.9e)
~~7~~ 6	Linda Vista Ave.	Extend southwest of Lone Oak Ave. and connect with Robinson Ln. (Policy T-1.9a)
~~8~~ 7	Solano Ave.	Extend south and connect with First St. (Policy T-1.9f and Implementation Program T-1.Af)
~~9~~ 8	First St. Bridge over SR 29	Widen to four lanes (Implementation Program T-1.Ab)
~~10~~ 9	First St. at California Blvd.	Provide double left-turn lanes for traffic eastbound on First St. (Implementation Program T-1.Ah)
~~11~~ 10	Soscol Ave.	Reserve right-of-way to provide for six lanes between Imola Ave. and Lincoln Ave. (Implementation Program T-1.Ac)
~~12~~	~~Souza Ln.~~ (See Appendix D)	~~Extend east to Capitola Ave. (Policy T-1.9b).~~
~~13~~ 11	Silverado Trail	Widen southbound right-of-way to provide one through lane and two left-turn lanes (Implementation Program T-1.Ae)
~~14~~ 12	Saratoga Dr.	Extend west to Silverado Trail (Policy T-1.9c)
~~15~~ 13	Terrace Dr.	Complete missing segment over Cayetano Creek (Policy T-1.9d)
~~16~~ 14	Gasser Dr.	Extend north to connect with Silverado Trail/Soscol Ave. (Implementation Program T-1.Ag)
~~17~~ 15	Imola Ave.	Widen to four lanes between Soscol Ave. and Coombs St. (Implementation Program T-1.Aa)
~~17~~ 16	SR 29 at Trancas Street	Construct interchange (Implementation Program T-1.D)

Source: Napa Draft General Plan Policy Document, 1996. Revised 1997 to reflect Response to Comments & Addenda.

- For freeway mainline sections and freeway ramps, the threshold level used in this analysis is LOS E, consistent with the criteria used by the County Congestion Management Authority (CMA). Facilities under the jurisdiction of the CMA in the City of Napa are the State Highways (12, 29, 121, and 221) plus Trancas Street. If a segment drops below LOS E, it is considered a significant traffic impact.

- The Draft General Plan establishes a minimum acceptable level of service for signalized intersections on arterial and collector streets at midrange LOS D. Midrange LOS D represents delays greater than 32.55 seconds per vehicle. It should be noted that for purposes of determining significance in the broader context of the General Plan, 2020 LOS levels that are slightly higher than midrange D are considered mitigated. Midrange LOS E would be permitted in the following areas:

  - Downtown Napa within the area bounded by Soscol Avenue, First Street, California Boulevard, and Third Street;

  - Jefferson Street between Third Street and Old Sonoma Road; and

  - Silverado Trail between Soscol Avenue and First Street.

- For unsignalized intersections, the minimum acceptable level of service recommended by the Draft Policy Document is midrange LOS E. Midrange LOS E for unsignalized intersections represents a reserve capacity of 49.5 vehicles per hour or greater and is considered restrictive for purposes of overall evaluation at the General Plan level. For purposes of EIR analysis, LOS F would therefore be considered significant. In the context of the General Plan, given the time frame and extent of variables, "unacceptable" at a single intersection does not constitute significance at the overall project level.

- For transit and bicycle facilities, a significant effect would occur if General Plan proposals and policies thwarted or diminished access to transit service or bicycle routes, eliminated routes, or did not support use of these alternative modes of transportation.

Environmental Analysis

1. ~~*Traffic associated with development permitted by the Napa General Plan would be adequately mitigated by the policies and programs included in the Draft General Plan. (I)*~~

   Most of the traffic associated with development within the city permitted by the Napa General Plan would be adequately mitigated by the policies and programs included in the Draft General Plan. However, some intersections (e.g. SR 221 at SR 29) that operate at LOS F with no mitigation measures identified may create potentially significant impacts. (S) In addition, an uncertainty of funding for transportation improvements and city trips that impact roads and intersections outside the city limits may create potentially significant traffic impacts. (S)

   The combination of increased land use development and roadway system improvements proposed by the Napa General Plan would, for the most part, result in a transportation system operating within the criteria established by the General Plan Policy Document. Of the 34 signalized

intersections analyzed for the 2020 scenario, nine new intersections would become congested. With the improvements recommended in Table 3.3-3, all but one would operate within or very close to the established criteria. The single intersection which would not satisfy the criteria, SR 221 at SR 29, is currently already operating at LOS F. Furthermore, much of the increased traffic demand at that intersection would be generated not by City growth but by cross-country traffic traveling between Solano and Sonoma Counties. Similarly, for unsignalized intersections, Sierra Avenue at SR 29 would operate at LOS F. This intersection already operates at an unacceptable level and given the significance criterion for unsignalized intersections, this isolated instance of congestion would not be considered a significant effect.

The Draft General Plan recommends that the intersection improvements identified in the Methodology section, above, and the roadway improvements in Table 3.3-3 be implemented over the 25-year planning horizon of the General Plan (Policies T-1.3 and T-1.9). The actual timing and financing of these projects will depend on the accumulation of traffic impact mitigation fees, priorities identified in the City Capital Improvement Program, and public/private contributions. For example, pursuant to Implementation Program T-1.C and Policy Resolution No. 27, developers are required to pay a Street Improvement Fee to fund specified traffic improvements on arterials and collectors. The actual construction of the roadway project will depend on the rate of development and the project's priority or importance relative to other projects. Thus, at the general plan level of discussion, particularly one that describes a buildout scenario 25 years in the future, it is not possible to pinpoint the timing and means of implementing these specific projects. At best, the Draft General Plan does specify that nine of the intersection and roadway improvements would be included in the Capital Improvement Program for implementation between 1998 and 2010 (Implementation Program T-1.A). ~~One other improvement (the interchange at SR 29 and Trancas Street) must await funding.~~ One other improvement (the interchange at SR 99 and Trancas Street) has received environmental clearance and $27 million has been programmed for the project. In the interim the City will work with Caltrans and the Congestion Management Agency to make improvements. These interim remedies are programmed in the years 2002 to 2004 (Implementation Program T-1.D). Finally, the Draft General Plan acknowledges the need to develop viable funding sources to implement the above improvements. Towards this end, the Draft General Plan recommends creation of a street utility assessment district (Implementation Program T-1.B), updating the existing Street Improvement Fee Program (Implementation Program T-1.C), and pursuit of available state and federal funds (Policy T-1.7).

It should also be noted that a key planning objective of the General Plan Update has been to increase affordable housing and improve the jobs/employed resident ratio from 0.90 to a maximum of 1.1. The Draft Background Report and the earlier Futures Report both contain analyses of providing housing for the local Napa workforce as well as jobs for employed residents. The Draft Policy Document includes policies to improve this ratio, thereby reducing the need for long commutes. This effort is also considered by Caltrans to be a trip reduction strategy and thus functions as a mitigation measure for increased traffic volumes on the local and regional road networks.

~~As a result of the above measures, the Draft General Plan would not result in significant adverse traffic impacts.~~

Determining the external impacts of growth for an area as large as the city of Napa is difficult, since technically it is not possible to attribute specific impacts solely to the city. Impacts outside of the city are attributable to three major sources:

- Growth within the city
- Growth outside the city
- Growth in travel demand between locations outside of the city

With regard to growth within the city, a significant increase in travel outside the city would not occur without growth outside the city. For the real-world condition where there would be growth throughout the sub-region, it is difficult to attribute impacts just to the city, since trips with ends both in and out of the city are partially attributable to each. Thus, it is not proper to simply compare 1992 (base year) conditions to 2020 buildout conditions and attribute all of the impacts to the city.

In other work for projects in Napa County, particularly for the Napa County Congestion Management Agency, eight representative intersections outside the city have been evaluated. In response to comments on the Draft EIR, Dowling Associates evaluated these intersections for the following conditions:

- Existing conditions
- A combination of 2020 land use in the city of Napa and 1992 land use outside the city; this represents the "existing-plus-project" impact in that it holds outside conditions constant. However, it does not represent a real-world condition in that, even if there is no growth within Napa County outside the city (which this scenario is intended to represent), there would still be a growth in external-external traffic (such as that between Solano and Sonoma Counties, which in fact represents the largest component of traffic growth within the County)
- A combination of 1992 land use within the city of Napa and 2020 conditions outside the city. This represents a cumulative scenario "base case," representing the external events that would occur outside of the city in the year 2020
- A 2020 forecast, using 2020 land use and external travel patterns for all conditions. This represents the so-called "cumulative scenario".

In order to prepare this supplemental analysis, it was necessary to make one set of assumptions that differs from all other model runs made to date using the Napa County Travel Forecasting Model. In all other runs, the control totals for traffic at the gateways to the county were derived using Metropolitan Transportation Commission (MTC) travel model estimates as controls; the MTC model estimates were used to determine growth factors on existing volumes to derive the gateway controls. In those cases, however, Dowling was preparing a composite estimate for a particular target year (i.e. a 2000 forecast or a 2020 forecast). In this case, Dowling prepared scenarios for the specific purpose of determining impacts, and has used combinations of data for 1992 and 2020. In order to reflect the fact that some internal Napa traffic will be destined for areas outside the county, it is necessary to derive some type of methodology to determine how much additional traffic might go outside the County with this type of combined data. The technique used has been to determine the growth rate between 1992 and 2020 for internal Napa County traffic, and to factor the gateways up by that proportion. Thus for the scenario composed

of 2020 land use within the city and 1992 outside the City, the gateway volumes were increased by 14%, representing the total contribution of 1992-2020 growth within Napa County to traffic compared to 1992. For the scenario where 2020 land use was used within the city of Napa and 1992 land use used outside the city, the gateway volume was increased by 27%.

Table 3.3-4 below documents the numerical results of this analysis by reporting Service Level at each of the eight intersections for the four scenarios described above. The 1992 scenario uses the 1992 highway network; the remaining scenarios use the 2020 network. Note that since 1992, improvements have been made to the intersections of SR 29/Airport Boulevard and SR 29/Kelly Road; as a result, improvements are seen for the scenario which combines 2020 land use in Napa and 1992 in the remainder of the county.

Looking at the first two data sets in Table 3.3-4, which represent existing conditions and existing plus project conditions, it can be seen that the Service Levels WITH the project are the same or improved as the existing conditions. When a comparison is made between the second two data sets, which represents the cumulative situation, it can be seen that the service levels are the same except at the intersection of American Canyon Road and SR 29, where the Service Level would decline from D to E. Thus, for the existing plus project scenario, the Draft General Plan would have no significant impacts on the major roadways in Napa County that lie outside the City. For the cumulative scenario, there would be a projected degradation of traffic at one intersection, American Canyon Road & SR 29. This degradation would still be within the Napa County CMA's standard for this facility. The major expected changes in service level between 1992 and 2020, at SR 12/29/Airport Boulevard, would be caused largely by the increase in traffic between Sonoma and Solano Counties.

Note : New table generated in Response to Comments and Included in DEIR

Table 3.3-4

Comparison of External Traffic Conditions

Intersection	Service Level	Average Delay (Secs.)	Volume/ Capacity Ratio
1992 Existing Conditions			
#1012 Oak Knoll & SR 29	B	7.4	0.479
#4320 Madison & SR 29	B	6.7	0.672
#4321 SR 29 & Adams (St. Helena)	B	11.7	0.73
#4372 SR 12 Kelly	F	267	1.515
#4373 SR 29 & SR 12	F	496	1.662
#4864 SR 29 & Rio Del Mar	A	4.4	0.696
#4897 SR 29 & Pope (St. Helena)	B	11.3	0.711
#4916 SR 29 & American Canyon	C	21.6	0.893
2020 in Napa - 1992 Outside			
#1012 Oak Knoll & SR 29	B	7.2	0.554
#4320 Madison & SR 29	B	6.7	0.672
#4321 SR 29 & Adams (St. Helena)	B	10.8	0.604
#4372 SR 12 Kelly	B	11.8	0.791
#4373 SR 29 & SR 12	C	22.3	0.924
#4864 SR 29 & Rio Del Mar	A	4.1	0.573
#4897 SR 29 & Pope (St. Helena)	B	11.1	0.673
#4916 SR 29 & American Canyon	C	17.4	0.707

Table 3.3-4 Continued

1992 in Napa - 2020 Outside			
#1012 Oak Knoll & SR 29	B	7.9	0.624
#4320 Madison & SR 29	B	6.7	0.672
#4321 SR 29 & Adams (St. Helena)	B	10.8	0.604
#4372 SR 12 Kelly	C	19.6	0.957
#4373 SR 29 & SR 12	F	205.1	1.393
#4864 SR 29 & Rio Del Mar	B	5.5	0.832
#4897 SR 29 & Pope (St. Helena)	F	75.4	1.174
#4916 SR 29 & American Canyon	D	37.0	1.018
2020 Cumulative			
#1012 Oak Knoll & SR 29	B	8.4	0.659
#4320 Madison & SR 29	B	6.7	0.672
#4321 SR 29 & Adams (St. Helena)	B	10.8	0.604
#4372 SR 12 Kelly	C	18.8	0.948
#4373 SR 29 & SR 12	F	273.5	1.48
#4864 SR 29 & Rio Del Mar	B	5.7	0.837
#4897 SR 29 & Pope (St. Helena)	F	85.1	1.195
#4916 SR 29 & American Canyon	E	45.4	1.058

2. *The proposed General Plan would be in conformance with the Napa County Congestion Management Plan. (I)*

The Napa County Congestion Management Agency (CMA) requires that a traffic analysis using the Congestion Management Plan (CMP) model be performed for general plans updates that would increase the amount of traffic being generated by 500 or more peak-hour trips or which would result in land uses that are inconsistent with the current CMP land use database. The CMP land use database was developed based on each jurisdiction's projected land uses, and was then adjusted to conform with Association of Bay Area Government projections.

The City traffic consultant performed an initial screening to determine whether the proposed General Plan would meet the CMA's criteria triggering the need to perform a full-blown CMP analysis. Because the CMP land use scenario does not address the General Plan planning horizon year 2020, the consultant constructed a year 2000 land use scenario interpolating the countywide 1992 land use database and the city's projected 2020 land uses to the CMP 2000 database. The results of this analysis indicate that the overall peak-hour trips associated with the General Plan update are minor and would not exceed the 500 trip threshold. The CMA has concurred with the consultant's methodology and results, and has concluded that the land uses associated with the proposed General Plan are generally consistent with those of the CMP database (see Appendix C). Therefore, CMP analysis of the proposed project will not be necessary.

3. *The Draft General Plan encourages access to and expansion of public transit services and facilities, thereby enhancing mobility for local residents, employees, and commuters. Implementation of policies and programs supporting alternative modes of transportation would result in the added benefit of reduced energy use, air emissions, and automobile congestion. (B)*

Napa is presently served by two transit systems: the City-operated Napa Valley Intracity Neighborhood Express (VINE) and Napa Valley Transit (NVT), operated by the County and Napa County cities. VINE operates a five route, nine bus fixed-route transit system in the City; NVT provides inter-city transit service along the SR 29 corridor from Vallejo through Napa to Calistoga. In fiscal year 1993/94, the VINE and NVT carried a combined total of over 700,000 passenger trips, slightly more than two percent of all street and highway trips within the County.

Chapter 1, Land Use, and Chapter 3, Transportation, of the Draft General Plan contain policies and implementation programs supporting the use of public transit services and facilities and alternative modes of transportation. As a result, the Draft General Plan promotes mobility within the Napa Valley, particularly for those population groups who are typically transit dependent such as youth, lower-income households, and senior citizens. At the same time, support of transit services to the City's major activity center would enhance access to these facilities and alleviate local automobile congestion. To further these positive effects of transit, major new commercial projects will be required by the City to be designed to support mass transit and alternative modes of transportation (Policy LU-5.3). The City will continue its financial support of transit services within the City with the objective of increasing the transit/automobile mode split to five percent by 2020 (Policy T-5.1). The City will also continue to encourage developers to include public transit support and promotion of other alternatives to single occupancy vehicles, including discount bus passes to employees, bicycle facilities, transit information displays, and on-site transit facilities

(Policy T-5.12). The City will, when feasible, consider expanding public transit facilities and services such as requiring the dedication and/or provision of bus turn-outs in appropriate locations (Policy T-5.7), supporting adequate, efficient and convenient transfer and operational facilities in the downtown areas (Policy T-5.8), planning for terminal and operations facility expansion (Policy T-5.9), and exploring the feasibility of developing a satellite transfer point and park-and-ride facility in conjunction with the Trancas/SR 29 Interchange project (T-5.10).

4. *The Draft General Plan encourages bicycle use and provision of bicycle facilities. In addition to reducing energy use, air emissions, and automobile congestion, the proposed bicycle plan would increase recreational opportunities for City residents and offer an alternative to the automobile. (B)*

Bicycles represent a useful alternative to the automobile for shorter trips. A comprehensive bicycle plan can serve to encourage bicycle usage in place of automobiles resulting in positive effects on traffic congestion and air quality. The City's future bicycle facilities are being planned in coordination with the Bicycle Advisory Committee (BAC), a group composed of members from local cycling clubs. The BAC, in conjunction with City staff, has developed a revised Bikeway Plan which seeks to provide more direct access to schools, parks, and community facilities. Existing facilities represent about one-third to one-half of those planned in the City.

Policies and implementation programs supporting bicycle use, facilities, and safety are included in Chapter 1, Land Use, and Chapter 3, Transportation, of the Draft General Plan. Major new commercial and residential projects (residential subdivisions over 20 units and all commercial or industrial projects over 20,000 square feet) will be required by the City to support and promote bicycle access as well as other modes of transportation in the site planning and design stages (Policies LU-5.3 and T-6.9). The Draft General Plan further recommends evaluating the feasibility of establishing two "bicycle boulevards" to provide priority travel (north-south and east-west) for bicycles through the City (Policy T-6.3) and incorporating regional bicycle routes (such as the Bay Trail) into the City bicycle route system (Policy T-6.12).

5. *The Draft General Plan encourages the use and development of pedestrian services and facilities. The emphasis on an interconnected, safe pedestrian network has the beneficial effect of improving access to the City's major activity centers and offering citywide recreational opportunities. (B)*

In a city with a significant tourist population such as Napa, one of the more popular modes of travel is walking. The most important pedestrian environment in the City is downtown. It is downtown's "walkability" that distinguishes it from the malls and strip-commercial shopping environments found elsewhere in Napa. Retaining an attractive and safe pedestrian environment with active storefronts is critical to the long term commercial success of downtown.

There are policies and implementation programs in Chapter 3, Transportation, of the Draft General Plan that support these objectives. The Draft General Plan Policy Document recommends requiring appropriate pedestrian access in all new developments (Policy T-9.1) connecting the City's major planned trails to the proposed regional Ridge and Bay Trails and linking all of these major pedestrian and bicycle routes to downtown (Policy T-9.4). To accomplish this, the City will encourage retail uses in the downtown area to be oriented to the sidewalk (Policy T-9.5) and will develop zoning standards and incentives to promote pedestrian access and amenities in development projects (Implementation Program T-9.A).

APPENDIX E

3.4 COMMUNITY SERVICES AND UTILITIES

Existing Conditions

This section describes existing conditions for the City of Napa's police and fire services, and for the City's water supply, wastewater, solid waste, and gas and electric utilities. Information regarding existing conditions for schools, libraries, and parks are not included here for the reasons described under "Significance Criteria." The topic of storm drainage is covered in Section 3.9, Hydrology and Water Quality. *Further background information regarding the provision of community services and utilities within the RUL is available in Chapter 4, Community Services, of the Draft General Plan Background Report.*

Police

The Napa Police Department (NPD) serves Napa's city limits. Four patrol beats, congruent with the northwest, northeast, southwest, and southeast sections of Napa, are each staffed by one officer per shift, three shifts per day, seven days a week. These beats change in response to factors that might affect response times in emergency situations, such as time of year, weather, and traffic condition on the bridges and highways in Napa (State Routes 29 and 121).

As of August 1994, the NPD employed 66 sworn police officers: one chief, one deputy chief, four commanders, nine sergeants, and 51 patrol officers. The NPD utilizes Community Service Officers to handle many non-emergency calls, freeing up sworn officers for priority law enforcement functions. This delivery system has allowed the NPD to maintain service levels in areas of critical need. Priority one calls (threat to life) are considered most important and receive the shortest response time. For example, during 1993-1994, Priority I calls had an average (sworn officer) response time of 3:45 minutes; whereas priority nine, "cold reports," elicited a community service officer in about 30 minutes. The NPD has established a 5-minute time limit as the maximum amount of time for a Priority I response.

Fire

As of January 1994, Napa Fire Department (NFD) had 46 personnel: 1 operations chief, 3 battalion chiefs, 12 captains, 17 full-time firefighters, and 13 firefighter/paramedics (Perkins 1994). There are 18 firefighter reserve positions that are basically volunteer, with minimal payments for service.

The City's three fire stations are staffed by a total of 13-15 personnel per 24-hour shift with a minimum of 4 firefighter/paramedics on duty at all times. In the five-year period from 1988 to 1993, NFD's total number of calls went from 3,956 to 4,776, an approximate 21 percent increase. Most of this is attributable to population growth in the City of Napa. The call volume in 1995 had increased to over 5,510 calls, of which 3,654 calls (66 percent) were of a medical/rescue nature.

The NFD believes that fire protection and emergency medical response (EMS) are considered good within a 1.5-mile radius of each fire station. The NFD strives for a three-minute average response time within these areas. The NFD has established a 5-minute time limit as the maximum amount of time appropriate for a unit response. Areas outside of the 1.5 mile response radius are Browns Valley, the

western portion of the Westwood Planning Area, the eastern portion of the Alta Heights Planning Area, Terrace/Shurtleff, River East, and Stanly Ranch.

Water Supply

The City of Napa provides water service within an area generally coincidental with the RUL. Water service is currently provided to 21,800 active connections which lie within both the city limits, and the County of Napa outside city limits but within the RUL. The RUL is the urban planning boundary for the City and is the defined service area for the purpose of estimating water demand. The city limits cover about 95 percent of the RUL, the remainder is unincorporated areas of the County. Water is also served outside the RUL to customers in Congress Valley, the Silverado Country Club community, and users along the Monticello Road and the Conn Transmission Main. The largest water service area outside the RUL is the Vichy/Silverado Country Club area, which purchases water from the City of Napa Water Department under contract.

Napa's current water demands are met by three sources: Lake Hennessey, a 31,000 acre-foot municipal water supply reservoir built in 1946; Milliken Reservoir, with a capacity of 1,980 acre-feet with a dependable yield of 1,200 acre-feet taking into account entitlements of downstream users; and water purchased under contract from the North Bay Aqueduct (NBA) system. This water is predominantly from the Sacramento River but also includes water from Lindsey and Cache sloughs and local runoff from Barker Slough. The State Water Project (SWP) has contracted with the City to deliver an increasing supply of water over time to a cap of 18,800 acre feet in 2021. The Water Department estimates that the water from these sources could supply approximately 53,799 housing units with a population of 123,200. However, the State may not have the water resources to provide more than 45 percent of the City's NBA entitlement which could supply approximately 35,700 housing units with a population of about 81,700 (more than the expected 2020 population figure under the Draft General Plan). To date, the SWP has developed only about 55 percent of the water supply it has been contracted to deliver, and is not expected to complete its original plan.

The City of Napa's peak water demand occurs in the summer, when an average of 14 million to 20 million gallons a day are used by residents. Winter water demand averages approximately 6 million to 8 million gallons a day. The higher demand in summer is partially due to the irrigation needs of Napa residents. The Water System Master Plan (~~1996~~ Adopted 11/97) provides a detailed analysis of water demand from 1970 to 1994, including optimization and a breakdown of water supplied to City customers by user types. These figures show an expected increase from the current normalized demand of about 13,550 acre feet per year (af/year), to a projected demand of about 16,566 af/year in the year 2020. This is a relatively small increase of about 25 percent over this 25-year period, and is consistent with the small increase in projected population in the Draft General Plan.

Wastewater Treatment, Storage, and Disposal

The Napa Sanitation District (NSD) provides wastewater disposal for the City of Napa, the Silverado Country Club area, Napa State Hospital, and industrial parks around the Napa County Airport. The rural areas outside of the NSD and American Canyon County Water District service areas are served by septic tank and leach field treatment systems. The NSD has 16 major service areas with drainage basins defined by topography and creeks. Wastewater is collected through a system of 230 miles of main sewer lines.

NSD facilities for wastewater treatment consist of the Imola plant and the Soscol plant and 340 acres of active oxidation ponds. The Imola plant has a ~~daily capacity~~ primary treatment capacity of 8.0 million gallons per day ~~and uses a primary treatment process~~. NSD discontinued use of the biofilters at the Imola facility in 1983 due to citizen complaints of excess odor production. In 1990, NSD began using the biofilters again during the winter months due to excess loading at the Soscol Plant. The Soscol plant ~~maintained by NSD for the Napa American Canyon Wastewater Management Authority (NACWMA),~~ has a capacity of 15.4 million gallons, ~~per day with 1.54 million gallons per day of oxidation pond capacity reserved for American Canyon's wastewater~~ which is the nominal hydraulic capacity of the plant in its existing configuration. Even though non wet weather flows are approximately 8 million gallons a day, the biological capacity is exceeded during certain times of the year. As a result, the ponds have consistently displayed low dissolved oxygen readings and produced periodic odors. Both the Imola and Soscol plant facilities have inadequate solids handling facilities and treatment capacity.

Currently the City of American Canyon is served by the Soscol Treatment Plan. However, the American Canyon City Council has voted to disconnect from the Soscol Treatment Plan, although the district has not received a formal notice to disconnect. This disconnection will not substantially reduce the loading on the ponds. During critical times, the departure of American Canyon would reduce loading on the ponds from 200% of capacity to 180% of capacity. Should the City decide to stay connected to the District's facilities, additional upgrades to the Soscol Plan will be required with costs of the upgrades paid for with fees from the City of American Canyon.

In 1984, the Regional Water Quality Control Board (RWQCB) set the NACWMA's effluent discharge rates into the Napa River to zero between May and October because summer season low-flow volumes were not enough to provide 10:1 dilution of treated effluent. During the wet weather months of November through April, treated effluent is discharged into the Napa River from the Soscol plant near the Napa County Airport. In order to comply with RWQCB requirements, NSD began contracting with local ranchers during the mid 1980s to irrigate their pasture land with reclaimed water. ~~Pasture irrigation and the use of the district's oxidation ponds for summer effluent storage has also helped the NSD reduce its wastewater treatment costs.~~ Currently, river disposal and pond storage systems are being used to their maximum allowable capacity. Increased flows resulting from population and business growth will necessitate expanded water reclamation efforts.

The NSD's 1990 Wastewater Master Plan recommends improvements to address future wastewater treatment and disposal needs for the City. The NSD has begun to implement phases of the Master Plan designed to ensure that the district will be able to meet the City's projected demands. Phase I of the treatment plant upgrade is nearing completion. This project involves construction of facilities that will allow the quality of water that the District produces for reclamation to be upgraded from Title 22 restricted use to unrestricted use, but does increase treatment capacity of the plant. In order for additional capacity to be available at the plant, subsequent plant upgrade projects will need to be constructed. Phase 2, which will increase the capacity of the plant in order to provide service to developments that are authorized by the City and County of Napa's General Plan, and are within the District's service area, is in the preliminary design stages and is currently being contemplated for approval by the District's board.

Solid Waste

The City of Napa lies within Napa County's Garbage Zone 1. This zone administers collection of all solid waste in Napa County south of the City of Yountville. In the past, Napa's solid waste has gone to the American Canyon Landfill. This 122-acre Class III landfill site was closed in 1995.

Napa County, through a Joint Powers Agreement with the cities of Vallejo and Napa, formed the South Napa Waste Management Agency (SNWMA) in August 1993 to deal with American Canyon Landfill's closure. The SNWMA constructed a 35-acre solid waste transfer station south of Napa at the Airport at 889 Devlin Road; the transfer station began operations on July 1, 1995 and serves the same geographic area previously serviced by the American Canyon Landfill. It is designed to process and transfer commercial, industrial and self-haul delivered solid waste and can handle an average of 520 tons per day (1,440 tons per day under peak conditions). Solid waste is shipped to the Roosevelt Regional Landfill in Washington state. The transfer facility is open 12 hours per day, Monday through Saturday, with the majority of solid waste delivered during the weekdays between 9 AM and 3 PM.

Gas and Electric

Electricity services in the City of Napa are provided by the Pacific Gas and Electric Company (PG&E). The City of Napa is fed from four electric substations as follows: 1) Tulocay Sub, south of Napa on Highway 221; 2) Basalt Sub, south of Napa on Highway 221 and north of Tulocay Sub; 3) Napa Sub, 300 Burnell Street, near the Napa fairgrounds; and 4) Pueblo Sub on Big Ranch Road, north of Napa. Overall electricity consumption for 1993 was approximately 306,208,405 kilowatt hours (kWH). Of this amount, 145,443,383 kWH was used residentially. The balance of consumption was as follows: 1) small commercial - 37,853,838 kWH, 2) large commercial - 100,473,320 kWH, 3) agricultural - 1,978 kWH, 4) streetlights - 2,717,486 kWH, and 5) industrial - 19,718,400 kWH.

Gas services in the City of Napa are also provided by PG&E. The City of Napa is fed from two major gas systems. The first is from the south along Foster Road into west Napa, and the second system extends from the south along Soscol Avenue into east Napa. Overall gas consumption for 1993 was approximately 1,901,126 decatherms. Of this amount, 1,469,742 decatherms, or 77 percent, was consumed by residential customers. The balance of gas is consumed by agricultural, commercial, and industrial customers.

Impact Assessment and Mitigation

Significance Criteria

Police and Fire. In accordance with Appendix G (z) of the CEQA Guidelines, criteria for measuring the significance of effects on emergency services relate primarily to interference with emergency response plans or emergency evacuation plans. For this EIR, significant police and fire service impacts are defined if the proposed project would result in emergency response times greater than 5 minutes.

Water Supply. ~~A significant impact would occur if the City could not meet the projected maximum daily water requirements of permitted development or if development is proposed in areas outside the planned water service boundary. In addition, Appendix G, elements (f) and (g), of the CEQA Guidelines indicate that a project would normally have a significant adverse impact on water supply if it~~

~~"substantially degrades water quality" or "contaminates a public water supply."~~ A significant impact would occur if new development authorized by the General Plan increased water demand that exceeded the available existing or planned supply of the City of Napa Water System.

Wastewater Treatment, Storage, and Disposal. ~~A significant impact would occur if development resulted in dry-weather wastewater flows that exceed the wastewater treatment, storage, and disposal capacity of the City or if development occurred in areas outside the planned sewage service boundary.~~ A significant impact would occur if new development authorized by the General Plan generated wastewater flows that exceeded the existing or planned wastewater treatment, storage, and disposal capacity of the Napa Sanitation District's system.

Solid Waste. If the solid waste generated exceeds the capacity of the landfill where such wastes are disposed, or the capacity of the transfer station, then a significant impact would occur.

Gas and Electric. Energy-related impacts would be considered significant if the proposed project:

- substantially increases overall per capita energy consumption, substantially increases reliance on natural gas and oil, or substantially decreases reliance on renewable energy sources, thereby resulting in wasteful, inefficient, and unnecessary consumption of energy; or
- has an adverse effect on local and regional energy supplies and/or on requirements for additional capacity.

Public Facilities. Other important community services/facilities include schools, libraries, and parks. Impacts to schools, libraries, and public parks from increased development, while important to the quality of life available in the City or project area, do not typically result in physical environmental impacts. The changes brought on by the proposed project such as overcrowding or overuse are not regarded as significant impacts under CEQA. In *Goleta Union School District v. Regents of the University of California* (1995), the Court of Appeal found that "[C]lassroom overcrowding, per se, does not constitute a significant effect on the environment." Similarly, the Court of Appeal considers effects to public facilities or services as not automatically being significant effects of a project. CEQA analysis, however, would be required to discuss impacts related to physical changes to the environment from the construction and operation of new or expanded schools, libraries, or parks.

Environmental Analysis

Police and Fire Services

1. *Development accommodated by the Draft General Plan would increase the demand for police services but would not be expected to adversely affect response times. (I)*

   Development accommodated by the Draft General Plan would occur primarily within the existing RUL boundaries, and a small percentage would be located in the areas where the RUL would be expanded. Development within the existing RUL would be readily served by the existing NPD beat structure. The NPD strives to maintain a five-minute maximum response time standard to Priority I emergency calls within this beat structure. For future development occurring within the existing RUL, the current beat structure would provide future response times comparable to current levels, which are considered acceptable by the City.

New development in areas where the RUL would be expanded would also not result in increased response times. The proposed RUL expansion would occur on the outskirts of the City in three of the City's Planning Areas: Planning Area 2 (Vintage) at the intersection of Big Ranch Road and Trancas Street; Planning Area 11 (River East) at the Napa State Hospital; and an area in the southern portion of Planning Area 7 (Westwood). Access to these areas is not restricted, since each area is situated on or near a major roadway. These areas are also adjacent to existing development within the RUL and existing police beat structures. The largest of the RUL expansion areas at the Napa State Hospital is already developed and receives law enforcement services. The other two areas are relatively small. The area adjacent to the Westwood Planning Area, west of Foster Road, is surrounded on three sides by the existing RUL. The area adjacent to the Vintage Planning Area off Big Ranch Road and Trancas would extend the RUL by approximately 1/4 mile. Consequently, Priority I response times to each of these areas would be negligibly greater than to areas within the existing RUL.

While new development would lie within acceptable response times, policies and implementation programs contained in Chapter 4, Community Services, of the Draft General Plan Policy Document seek to maintain adequate police services commensurate with growth in the City of Napa. These policies and programs would also lessen police services impacts associated with expansion of the RUL. In particular, Policy CS-2.2 calls for maintenance of a police force sufficiently staffed to maintain a five-minute response time to Priority I calls, and Policy CS-4.1 calls for continuation of community-oriented education and involvement programs.

2. *Development accommodated by the Draft General Plan would increase the demand for firefighters and equipment but would not be expected to adversely affect emergency response times by Napa Fire Department personnel. (I)*

Development accommodated by the Draft General Plan would result in an increased number of structures and population within the RUL, thereby increasing the number of calls for service and the need for fire personnel. This expected increase in the demand for services would not adversely affect fire protection and emergency medical services due to policies and implementation programs in the Draft General Plan Policy Document. These policies and programs would serve to reduce potential fire protection service impacts and provide for the adequate provision and administration of fire/emergency services commensurate with the development of the City under the Draft General Plan. In particular, Policy CS-5.1 calls for the maintenance of adequate personnel and equipment necessary to provide fire suppression services for the City of Napa; Policy CS-5.6 calls for the provision of adequate fireflow throughout the community; Policy CS-5.8 calls for the continuation of mutual aid agreements with the California Department of Forestry, the County of Napa, and the American Canyon Fire Protection District; and Implementation Program CS-5.C calls for the City to prepare a Fire Services Master Plan that establishes a city-wide long range plan for providing fire suppression and medical aid services, defining areas of mutual aid and other jurisdictional responsibilities. These policies and measures are complemented by standard mitigations described in Policy Resolution No. 27, such as adherence to the Uniform Fire Code and the Fire Departments "Standard Requirements for Commercial/Residential Projects;" automatic sprinkler systems in all new buildings; and payment of fire and paramedic fees in accordance with Napa Municipal Code Chapter 15.78.

Water Supply

3. *Development accommodated by the Draft General Plan ~~would not~~ could result in demand in excess of the City of Napa's water supply system during drought years. ~~(I)~~ (PS)*

~~The City of Napa Public Works Department derived overall per capita water demand by dividing annual water production by the associated population. The resultant demands from the land use based projection show an expected increase from the current normalized demand of about 13,550 af/year, to a projected demand of about 16,566 af/year in the year 2020.~~

~~This represents and increase of approximately 25 percent and is consistent with the projected population increase in the General Plan. In times of multi-year droughts, the City's existing water supply is insufficient to meet the City's needs. During these periods, customers have been asked to reduce usage through voluntary and mandatory conservation programs. During the life of the General Plan, multi-year droughts are not expected to be a significant impact upon the City's water supply system because water entitlements from the State Water Project (SWP) are growing significantly faster than projected growth in water demand within the City. However, periodic, unresolved environmental problems in the Sacramento River Delta and minimum flow requirements for endangered species make the reliability of the SWP entitlements unpredictable. As noted under the discussion of existing conditions, if the SWP entitlements were limited to 45 percent of the full contracted amount, there would still be sufficient water supply to meet the projected demand of the Draft General Plan to 2020.~~

Policies and implementation programs in Chapter 4, Community Services, of the Draft General Plan Policy Document emphasize continuation of water conservation programs, water demand management, and coordination with state and federal agencies. In particular, Policy CS-9.1 and Policy Resolution No. 27 call for the implementation of water conservation programs, and Policy CS-9.3 calls for an evaluation of the feasibility of the use of reclaimed wastewater in appropriate locations. To enable the SWP to meet its contractual obligations to the City, the Draft General Plan encourages state and federal agencies to cooperatively establish programs and projects to help achieve this end (Policy CS-9.6). As a means of limiting and preventing development beyond the City's RUL, the Draft General Plan seeks to control urban development in the City's Water Service Area beyond the RUL (Policy CS-9.8). In order to plan future and adequate water supply capacity and services to the City, the Draft General Plan calls for the implementation of the Public Works Department's Water System Optimization and Master Plan adopted in November 1997 (Implementation Program CS-9.A).

SWP Entitlement Buildups

The City of Napa currently has sufficient water supplies during normal and wet years as indicated in the Draft Water System Optimization and Master Plan. Due to the City's increasing entitlement from the State Water Project (SWP) and the minimal increase in water demand from growth through the year 2020, the City does not have a shortage of water supplies in normal rainfall years. During drought years when water supplies from local sources are reduced and the City's SWP entitlements are cut back, the City faces a current deficit in water supplies as do many other State Water Contractors. The City's current deficit during drought years is 4,200 acre feet of water

assuming a reduction in SWP entitlements of 50% and a local reduction in water demands of 20% as a result of demand management programs which the City would implement during drought periods. The potential reductions in supply from the SWP is the reason why the City faces drought-year water supply shortfalls. This existing estimated 4,200 acre feet deficit in drought years will reduce each year as the City's SWP entitlement increases and based on the current schedule of entitlement build up from the SWP, the City will have sufficient water supplies in both dry and normal years after the year 2012. The City's concurrent schedule of entitlement build up from SWP is greater than the City's water supply needs.

The City's water supply from the SWP was reduced by 80% in 1991 and by 55% in 1992 due to the drought the state experienced between 1987 and 1992. The Department of Water Resources (DWR) has adjusted how the SWP is operated due to the recent dry years and reductions in water supplies. Prior to 1991 DWR had never experienced multiple years of drought and were therefore hesitant to cut back deliveries in dry years. They are now operating the State Water Project very differently. Since 1992, Department of Water Resources has begun each year with restrictions in entitlement until rainfall and snowfall is adequate to ensure delivery of full entitlements to each State Water Contractor. This change in operation will result in more years when the City will experience small cut backs in its entitlement deliveries from the SWP, but will also result in less severe cut backs in any single year due to the more cautious management of the State's water supplies. This management approach will improve the City's water supply reliability because in normal and wet years the City has excess water supplies and only experiences a deficit if SWP entitlements are reduced more than 25%.

The City is able to reduce the impact of SWP entitlement cutbacks by taking advantage of Interruptible Entitlement water deliveries that are often available in wet winter months when there are excess flows within the Delta. These excess flows are a result of uncaptured runoff from the tributaries to the Delta. Delivered water from these excess flows are not considered entitlement deliveries, allowing the City to take more water than the allocated SWP entitlements in any given year. Interruptible Entitlements are unpredictable, but were available in 1991 and 1992 which were the worst years of the drought. Napa County water agencies with SWP entitlements were able to take 676 acre feet of Interruptible Entitlements in 1991 and 1,058 acre feet in 1992 over and above the normal SWP entitlements. This reduced the impact of SWP entitlement deliveries significantly. Solano and Napa County water agencies have been able to take advantage of Interruptible Entitlements because the location of the SWP's North Bay Aqueduct and where it connects to the Delta allows these agencies to benefit from these excess flow conditions in the Delta long before other State Water Contractors. The amount of water supply available in dry years from Interruptible Entitlement deliveries is available in most years to the City and improves the reliability of the SWP.

The Monterey Agreement

Recent agreements by the State Water Contractors has also resulted in improving the reliability of the SWP. The State Water Contractors drafted the Monterey Agreement in 1995 which has recommended changes in the SWP contracts to allow contractors to more easily enter into water

transfer agreements and make adjustments to their entitlements and their entitlement build up rate. While the Monterey Agreement in its entirety has not yet been implemented, a final environmental document has been certified and many of the provisions are being implemented by DWR. This has also increased the SWP reliability by allowing State Water Contractors to better manage their water supplies. The City has requested the Napa County Flood Control and Water Conservation District (NCFCWCD) contact DWR on the City's behalf to pursue the acceleration of the City's SWP entitlement to the City's full amount of 18,800 acre feet. The City would satisfy its drought year water supply needs by accelerating to the full entitlement amount. The City's existing SWP entitlement is 6,600 acre feet (1997) and increases by approximately 400 to 500 acre feet per year until it reaches 18,800 acre feet in the year 2021. When DWR cuts back deliveries of entitlements, it reduces the delivery by a percentage of the State Water Contractors current year entitlement. The City currently has a very slow build up of entitlement through the year 2021 when the City's entitlement reaches it full amount. Many other State Water Contractors have already reached or will reach their full entitlement much quicker than the City of Napa.. With a larger entitlement the City will receive more water in dry years because the reductions in deliveries will be a percentage of a much larger number resulting in a lager supply of water. Accelerating the City's SWP entitlements will not result in the need for additional physical improvements to the City's water system or the SWP.

SWP Drought Water Bank

During the recent drought, the Department of Water Resources developed an emergency drought water bank by purchasing water from the agricultural community and various agencies that had excess water available. This water was then made available for purchase by State Water Contractors. The program was well received and was so successful that in both 1991 and 1992 DWR was able to secure more water than was purchased from the drought water bank. The City of Napa did not take advantage of these water supplies because the City was able to purchase drought water supplies from Yuba County Water Agency. DWR has recently formalized the State Drought Water Bank program and has certified an environmental document (November, 1993) making plans to implement the water bank in future years to provide drought water supplies to State Water Contractors. This is another very viable option available to the City in the event another severe drought occurs.

Other SWP Drought Year Projects

Since the recent drought, the State Water Contractors have been meeting with DWR and actively encouraging the development of additional water supplies to increase the reliability of the SWP during drought years. DWR is currently pursuing two dry year water supply projects. The first is called the American Basin Conjunctive Use Project which will develop approximately 55,000 acre feet of additional water supplies in dry years (Pre-Feasibility Report, American Basin Conjunctive Use Project, February 1995). DWR solicited interest in this project and the NCFCWCD has contacted DWR on the City's behalf indicating interest in the project. The NCFCWCD has indicated to DWR that the SWP subcontractors in the county of Napa are interested in 2,800 acre feet of the 55,000 acre feet the project would potentially yield.

The second project being investigated by DWR is titled "State Water Project Supplemental Water Purchase Program" and is a project pursuing the development of a dry year water purchase program where contracts with various agricultural interests and other agencies would be developed allowing for the purchase of water supplies during years when the SWP could not deliver full entitlements to all State Water Contractors. This project would potentially provide DWR with 400,000 acre feet of dry year water supply that would be available to State Water Contractors for purchase in dry years. DWR has prepared and distributed a draft environmental document covering the project titled "State Water Project Supplemental Water Purchase Program, Draft Program Environmental Impact Report, State Clearinghouse 94082033". Both of the projects listed above are options identified in the Draft Water System Optimization and Master Plan that are viable water supply alternatives available to the City to increase drought year water supplies. The referenced environmental documentation regarding these SWP programs are available for review at the City of Napa Public Works Department, 1600 First Street, Napa, CA.

Reclaimed Wastewater

Another option to improve the City's water supplies identified in the Draft Water System Optimization and Master Plan is the utilization of reclaimed waste water to offset potable water supplies currently being used to irrigate parks, a golf course, and other landscaped areas within the City. The City is currently negotiating terms of an agreement to allow the Napa Sanitation District to deliver reclaimed waste water to current City water customers to reduce the amount of potable water supplies used for irrigation purposes within the City's water service area. The area being proposed by the City and the Napa Sanitation District for the use of reclaimed waste water is the area south of Imola Avenue, east of the Napa River, and west of State Highway 221 (including the Napa State Hospital property), the south Napa Market Place, the Stanley Ranch, and the property owned by the Napa Sanitation District adjacent to Imola Avenue bordering the Napa River. It is proposed to off set the use of potable water used for irrigation of turf areas such as the Kennedy Golf Course, Kennedy Park, and the Napa Valley College. The use of reclaimed water in this area could off set approximately 400 acre feet of potable water currently being used for irrigation of landscaping and off set future development in this area that would otherwise use potable water from the City for landscape irrigation. This is another viable option to improving the City's water supplies in drought years.

Mitigation and Findings Concerning Level of Significance

Historical annual water production by the City over the last 25 years has ranged between about 10,400 and 15,200 af. Annual use of City water production during 1989 to 1994 ranged between about 10,400 and 14,100 af. The Draft Water System Optimization and Master Plan has predicted that annual water usage for the City of Napa Water System will be almost 16,600 af (in normal water years) by the year 2020. In addition, water demand by other entities that are at times supported by the City system (i.e., Calistoga, Yountville, Yountville Veteran's Home) will add an additional 1,460 af to the total demand (Draft Water System Optimization and Master Plan Volume I-Executive Summary, 1996).

Projected water yield in the year 2020 is expected to be approximately 35,200 af (in normal water years). In drought years, the City of Napa Water System demand is expected to be approximately 13,300 af (a 20% reduction of projected demand), while the projected drought year water yield of the City system is expected to be 9,100 to 14,800 af. Therefore, the City of Napa faces a potential water deficit in firm yield during drought years of its supply capacity to meet current annual demands and projected future demands during drought through the year 2012. This estimated deficit is contingent on the estimated firm yield for the local supply sources and the North Bay Aqueduct (NBA). On an annual basis, the deficit appears to be in the range of 2,500 to 4,200 af for current conditions with the deficit reducing each year until water supplies match the City's demand for water in drought years in the year 2012. From 2012 to 2020 the City has sufficient water supplies to meet drought year demands.

As described above, Project and Alternative Descriptions, the City has submitted a request to the State of California to modify its Table A entitlements for NBA water, which would enable the City to meet water demand during drought periods by accelerating full achievement of the City's SWP entitlements to 1997 rather than 2021. Approval of this proposal by the SWP would result in a less than significant impact.

However, at this time, the proposal has not been officially adopted by SWP. If the Table A entitlements for NBA water are not accelerated as proposed, or a combination of other supply options are not established, the City cannot guarantee water delivery for either the current or future water demand during drought year conditions. The other options from the SWP for water supply during drought years include the Drought Water Bank, American Basin Conjunctive Use project, the State Water Project Supplemental Water Purchase program. A combination of these programs and/or acceleration of the NBA entitlement could be relied upon to provide for the projected drought year deficits through an adopted program and contracts that provide certainty for delivery. Until the city is able to secure a certain and guaranteed water source during drought year conditions there is a potentially significant impact. A mitigation for this potential impact has been proposed in the form of an additional policy that would require the city to monitor building permits (new water system hook-ups) and to limit permits if necessary in order to guarantee drought year water supplies to existing and proposed development until such time as a reliable drought year water supply is secured. New policy language will be added to the Community Services Element as follows:

> *The City of Napa shall determine the firm yield available from existing and future SWP water supply sources and shall monitor and if necessary limit growth (new water system hook-ups) in order to guarantee drought year water supplies to existing and proposed development. Growth shall be monitored and, if necessary, limited as follows:*
>
> *1) The City shall not issue any building permits or similar ministerial entitlements for proposed structures that would increase net potable water consumption in the City or its service area in the absence of a letter from the Department of Public Works stating that approval of the permit or other entitlement will not adversely affect the City's ability to adequately serve the public health and safety needs of all of its water customers during drought conditions.*

2) In addition, when conducting environmental review for proposed development projects requiring General Plan amendments, specific plans, use permits, tentative subdivision maps, or similar discretionary approvals, the City shall include within the environmental document information assessing whether the City and its water suppliers are likely to have sufficient water supplies to adequately serve the proposed development and all other City water customers during drought conditions. In approving any such discretionary project, the City shall require, as a mitigation measure and conditions of approval, that the applicant(s) may not receive a final subdivision map or in the absence of the need for such a map, may not receive building permits or similar ministerial entitlements in the absence of a letter from the Department of Public Works stating that approval of the map, permit or other ministerial entitlement will not adversely affect the City's ability to adequately serve the health and safety needs of all of its water customers during drought conditions and that there will be sufficient water to serve the basic health, hygiene, and fire suppression needs of the community.

When contracts are modified or are executed with the SWP to secure additional reliable water supply for drought years or other dependable and adequate sources are guaranteed, the requirement to limit growth in the manner described above can be suspended.

The addition of this mitigation measure should reduce the level of significance for water supply during drought to less than significant; however, since water supply is ultimately dependent on several factors of nature which are out of the City or State Department of Water Resources control, drought year water supply remains uncertain for all water purveyors in California. As such, this impact is still considered potentially significant, even after mitigation.

As described above, the City has decided to revise the impact conclusions in this EIR related to water supply during drought times; however, based on past experience the City has demonstrated that there **is** sufficient supply, when combined with conservation practices, to ensure that there will be adequate water to preserve the health and safety of the citizens of Napa. In order to clarify the term "potentially significant" used in the conclusion above: such an impact would consist of a loss of landscaping due to landscape irrigation cutbacks and a certain level of inconvenience to citizens as they implement conservation practices in daily living. The "potentially significant" impact identified above is **not** an impact to the public health and safety due to insufficient water to serve basic health, hygiene and fire suppression needs of the community.

The City of Napa has a proven record of providing sufficient water during severe drought year conditions as experienced throughout the State in the early 1990's. In 1991, the City implemented mandatory water conservation measures and reduced water consumption by 33%. The City was able to reduce consumption without a threat to public health, or too much inconvenience to consumers, primarily by reducing the consumption of water for landscape irrigation. This maintained a dependable water supply for all other essential water needs.

Wastewater Treatment, Storage, and Disposal.

4. *Development accommodated by the Draft General Plan would necessitate expansion of treatment capacity, solids handling facilities, and water reclamation efforts by the NSD.* ~~*However, policies and implementation programs contained in the General Plan and implementation of improvements suggested in the NSD's 1990 Wastewater Master Plan would ensure that adequate wastewater treatment, storage and disposal facilities are available.*~~ *Based on existing NSD facility capacity, impacts to wastewater treatment capacity from future development are significant. However, the City is proposing an additional mitigation in the form of a policy that would require that all new applicants for development secure a "will-serve" letter from the NSD if the District notifies the City that a critical capacity situation exists. The mitigation would reduce the impact to less than significant. (I)*

NSD wastewater treatment facilities consist of two plants; Imola and Soscol. ~~The Soscol plant is operating near capacity and both plants have inadequate solids handling facilities and treatment capacity. These problems have been addressed as part of the Soscol plant phase II improvements recommended in the NSD's 1990 Wastewater Master Plan.~~ The Soscol Plant is operating at nominal hydraulic capacity and has exceeded the biological capacity during several times of the year. Both plants have inadequate solids handling facilities and treatment capacity. These problems have been addressed in the NSD 1990 Wastewater Treatment Master Plan as part of the Soscol Plant phase II improvements which will add growth capacity for up to 10 years. When planned improvements are completed, NSD's capacity would serve a projected population of about 82,000, including the Silverado Country Club area.

NSD's 1990 Master Plan update was based on the following population projections for year 2012 (Sec . D.2.3):

Table 3.4-1
NSD Primary Service Area Population Projections
NSD-ACCWD Master Plan Update

Year	RUL1	Silverado(2) Country Club	Unsewered(3) Population in RUL	Total Sewered Population
1985	60,900	1,846	4,130	58,616
1990	64,500	2,195	3,397	63,498
1995	67,700	2,544	2,664	67,580
2000	72,500	2,544	1,932	73,122
2005	75,100	2,544	1,200	76,444
2010	N.E.(4)	2,544	N.E.(4)	80,000
2012	N.E.(4)	2,544	N.E.(4)	82,000

(1) ABAG 1985.
(2) Estimated at 2.4 persons per dwelling unit and 100 percent occupancy.
(3) Assumes 30 percent of 1985 RUL population outside of the City is sewered, increasing to 80 percent by the year 2005.
(4) N.E. = not estimated.

Excluding the Siverado County Club area, the plan assumed a population of approximately 79,500 within the RUL by 2012.

The Draft General Plan projects a 2020 RUL buildout population of 81,140, which is slightly lower than what the City of Napa's 1982 General Plan projected for the year 2012. With the reduced capacity of the new General Plan and the extended time frame, it is unlikely that Napa's RUL population would exceed 77,500 by the 2012, well within the planning assumptions used by NSD in its 1990 Master Plan update.

Currently, a portion of the treated effluent generated at the Soscol Plant is spray irrigated on four water reclamation sites owned or leased by the NSD (approximately 760 acres). This occurs principally between May and October when discharge to the Napa River is prohibited. NSD is also providing reclaimed water to the Chardonnay Golf Course for turf irrigation and will be providing reclaimed water for landscape irrigation to industrial parks located in the vicinity of the Napa County Airport in the future. General Plan policies provide for the expansion of this reclaimed water program. The river disposal and pond storage systems are currently used to their maximum allowable capacities. Additional reclamation area and infrastructure would be required to accommodate the future growth anticipated by the Draft General Plan and facility improvements are included in the NSD 1990 Wastewater Master Plan.

Clearly, wastewater flows from new development authorized by the General Plan cannot be accommodated by the existing NSD facilities and possibly cannot be accommodated by already planned NSD facilities. This is considered a significant impact. However, the City relies upon the NSD observing existing policy that they will continue to plan, design, finance, and construct facilities adequate to meet the needs of NSD's entire service area.

Chapter 4, Community Services, of the Draft General Plan Policy Document contains policies to minimize wastewater generation and thereby lessen the demand on the NSD treatment plant. Policy CS-10.1 calls for water-conserving designs and equipment in new construction and retrofitting with water-conserving devices, and Policy CS-10.2 supports continued efforts by the NSD to promote the use of reclaimed water. ~~Because the NSD is implementing improvements that would serve demand through approximately 2012, there is considerable uncertainty in the actual buildout of the General Plan, and there is sufficient lead time for NSD to initiate a study and construct necessary improvements, the proposed project would not be considered to have a significant effect on wastewater services. Continuing with proposed improvements and monitoring and planning for the possible need for plant expansion is therefore appropriate mitigation at this time.~~ To ensure that new demands from new city development will not exceed NSD's capacity, the City could require that all new applicants for development secure a "will-serve" letter from the Napa Sanitation District if the District notifies the city that a critical capacity situation exists. The City would not approve the new development without the "will-serve" letter. An additional Policy is recommended as a mitigation as follows:

> *The City shall coordinate development review with the Napa Sanitation District to ensure that adequate wastewater collection, treatment, and disposal facilities can be provided by the District by requiring that all new applicants for development secure a "will-serve" letter from the NSD if the District notifies the City that a critical capacity situation exists.*
>
> *Where a critical capacity situation does exist, the City shall not issue, in the absence of a will-serve letter from the NSD, any building permits or similar ministerial entitlements for proposed structures that would increase net demand on NSD treatment capacity. In addition, when conducting environmental review for proposed development projects requiring General Plan amendments, specific plans, use permits, tentative subdivision maps, or similar discretionary approvals, the City shall include within the environmental document, information assessing whether NSD is likely to have sufficient capacity to serve the proposed development.*

In approving any such discretionary project, the City shall require, as a mitigation measure and condition of approval, that the applicant(s) shall obtain the necessary will-serve letters from NSD prior to receiving approval of a final subdivision map, or in the absence of the need for a final subdivision map, prior to receiving approval of any required building permits or similar ministerial approvals.

The addition of this mitigation measure would reduce the level of significance for wastewater impacts to less than significant.(I)

Solid Waste

5. *Development accommodated by the Draft General Plan would increase the City's solid waste disposal requirements. However, the increase is not expected to result in significant impacts to the present solid waste disposal system. (I)*

Development accommodated by the Draft General Plan would increase the amount of solid waste produced by the City's population. The Napa County Solid Waste Transfer Station (located near the Napa County Airport) processes solid waste from the cities of Napa and Vallejo and parts of Solano and Napa Counties. Waste is shipped to the Roosevelt Regional Landfill in Washington state, the largest handler of rail-shipped solid waste in the country. According to the Napa County Countywide Integrated Waste Management Plan Siting Element (June 1996), there is adequate capacity at the Roosevelt site to meet the disposal needs for the planning horizon of the Draft General Plan (capacity is not expected to be reached until 2034).

Even though there would be adequate capacity at the Roosevelt Landfill, the City of Napa undertook an aggressive recycling program in 1991 that included adoption of a Source Reduction and Recycling Element and Household Hazardous Waste Element aimed at reducing the amounts and types of solid waste being shipped to the Roosevelt Regional Landfill over the next 20 to 25 years. In addition, policies and implementation programs contained in Chapter 4, Community Services, of the Draft General Plan Policy Document would ensure that the provision and administration of adequate solid waste disposal services are commensurate with development in the City to the year 2020. In particular, Policy CS-12.1 calls for the provision of waste reduction and recycling public awareness programs and Policy CS-12.2 calls for continued monitoring of the City's Source Reduction and Recycling Element to ensure that the City is meeting its goals. In concert with these policies, Policy Resolution No. 27 requires as a condition of approval for commercial, industrial, and multi-family projects submittal of a source reduction plan consistent with the Source Reduction and Recycling Element and provision of a recycling/solid waste enclosure (when the projects have common solid waste facilities). Implementation Program CS-12.A calls for evaluation/modification of the current program in 1998 with a contingency plan of construction of a Materials Recovery Facility if AB 939-mandated 50 percent waste requirements are determined to be unachievable.

Gas and Electric

6. *Development accommodated by the Draft General Plan would neither substantially increase overall per capita energy consumption nor substantially increase reliance on natural gas and oil. (I)*

Natural gas and oil consumption would increase as a result of development accommodated by the Draft General Plan. However, these increases would be less than significant due to policies and implementation programs contained in Chapter 1, Land Use, and Chapter 7, Natural Resources, of the Draft General Plan Policy Document. These policies and implementation programs seek to offset the increased demand for energy resources resulting from new development by requiring that new commercial developments be designed to support mass transit and alternative modes of transportation (LU-5.3); encouraging developers to provide for on-site mixed uses that would allow employees to make non-work related trips without having to use their automobiles (LU-5.7);

encouraging the use of bicycle facilities and pedestrian walkways in order to decrease the use of private vehicles (NR-5.1); encouraging land use patterns and management practices that conserve air and energy sources (NR-5.2); and promoting energy conservation/energy efficiency improvement programs that reduce demand from power-generating facilities (NR-5.3). In addition, Policy Resolution No. 27 requires as a standard mitigation or condition of approval the incorporation of energy conservation measures into project design and construction in accordance with applicable codes and ordinances. As a result, no substantial increases in per capita energy consumption or reliance on natural gas and oil would occur.

7. *Development accommodated by the Draft General Plan would not adversely affect local and regional energy supplies. (I)*

The same policies and implementation programs discussed in Impact 6 apply here and help to minimize energy consumption. Particular emphasis is placed on encouraging non-automobile modes of travel, such as walking and biking, which would reduce reliance on oil and natural gas.

Since the majority of Napa's future development would occur within the existing RUL, which is already served by four electric substations and two major gas lines, no new major infrastructure such as high voltage transmission lines or substations would be required to provide electricity and gas.

The RUL expansion areas would be considered new service areas, but no new construction of major infrastructure facilities would be warranted due to the location of these areas. Two of the areas, the one west of Foster Road and the one northeast of Big Ranch Road and Trancas, are small and located adjacent to the existing RUL and PG&E service areas. New minor distribution lines would be required to carry electricity and natural gas to these areas.

Public Facilities

8. *Development accommodated by the Draft General Plan would increase the need for public facilities (new schools, libraries, corporation yards, public administration buildings) and the need for active recreational sites (parks). Potential impacts related to the construction and operation of public facilities are too speculative to assess at this time; potential impacts related to the construction and operation of parks was evaluated in a certified EIR on the City's Park and Recreation Element in 1993. (I)*

CEQA analysis is not required of impacts to quality of life issues such as school, library, or public park overcrowding due to increased development. However, CEQA does require analysis of potential, localized, site-specific impacts or changes resulting from new construction or expansion of these types of facilities.

The specific sites for public facilities are not known at this time. Furthermore, the timing of and construction schedule for any of these facilities are uncertain at this time, although Policy Resolution No. 27 requires the payment of required fees for public services in accordance with Napa Municipal Code Chapter 15.68. To define and analyze the potential impacts that may or may not result from the construction and operation of these facilities would be speculative. These future public facility projects would be subject to CEQA review on a project-by-project basis when, and if, construction is proposed at a future date.

With respect to new and improved park facilities, the City certified an EIR for the *City of Napa Parks and Recreation Element* in 1993. That EIR disclosed a number of potential impacts and mitigation measures, and remains applicable and relevant since the Parks and Recreation Element has been incorporated into the Draft General Plan. Copies of the Parks and Recreation Element EIR are available for review at the Napa Planning Department on First Street.

9. *Implementation of the proposed City trail system has the potential to cause indirect impacts to sensitive biological resources such as soil erosion and downstream sedimentation, excessive noise and lighting, and human encroachment. However, the design and location of proposed public trails would be consistent with resource preservation policies contained in the Draft General Plan and would keep potential impacts at less than significant levels. (I)*

   As each portion of the proposed City trail system is implemented, the risk of potential and indirect impacts to sensitive biological resources exists. To help keep these impacts at less than significant levels, the City will protect riparian habitat along the Napa River and its tributaries from incompatible uses and activities (Policy NR-1.1). The City will also provide controlled access points in designated areas to prevent unrestricted public access to riparian habitat on public lands (Policy NR-1.8). Where appropriate, the City will locate new parks, trails, and overlooks adjacent to areas that are protected from development for reasons due to resource conservation, safety provision, or historic preservation (Policy PR-3.4). City standard mitigation measures related to water would require any new development introducing new impervious surfaces into the area to submit a drainage and grading plan designed in accordance with City Public Works Department Standard Specifications. These measures would also ensure that no construction materials are conveyed into the storm drain system. Standard mitigation measures related to lighting would require all new lighting to be shielded to avoid glare, and that low-level lighting be utilized in parking areas as opposed to high-intensity light standards (Policy Resolution No. 27).

3.5 CULTURAL RESOURCES

Existing Conditions

The first Napans called themselves "Onasatis," the Outspoken People. These original Napans ~~were most likely related to the Coast Miwok and~~ lived in the vicinity of modern Napa until the early 1800's. The remains of the Onasatis and other Native American tribes known to have resided in or near Napa may be found throughout the project vicinity. In addition to Native American peoples, Napa has a rich and historic heritage that resulted from the waves of settlers that came to the region. This is reflected in the City's historic buildings and neighborhoods.

The City of Napa has had an active preservation program for more than 25 years. It began in the late 1960's, with the adoption of the Historic Preservation Regulations. More specific City policies and laws designed to protect, enhance and perpetuate structures, sites and areas contained within Napa's survey districts were developed in the 1970's. An increasing public awareness of historic preservation issues in the City of Napa resulted in the creation of an advisory board to advise City staff on historic preservation matters. Since 1978, five historic resources surveys have been implemented resulting in the inclusion of 31 properties on the National Register of Historic Places list, designation of 26 as City of Napa Landmarks, and one as a State of California Historic Landmark. *Further background information regarding cultural resources within the RUL is available in Chapter 6, Historic Resources, of the Draft General Plan Background Report.*

Impact Assessment and Mitigation

Significance Criteria

The National Register of Historic Places (NRHP) is the official list of properties significant in American history, architecture, archaeology, engineering and culture and was designed to be used by the general public, local communities, state governments and federal agencies in their preservation planning efforts. The following criteria are the National Register's standards for evaluating the significance of potentially significant historic properties. As provided in 36 CFR 60.6:

The quality of significance in American history, architecture, archaeology, engineering and culture is present in sites, districts, buildings, structures and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

A. that are associated with events that have made a significant contribution to the broad patterns of our history or;

B. that are associated with the lives of persons significant in our past; or

C. that embody the distinctive characteristics of a type, period, or method of construction that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

D. that have yielded, or may be likely to yield, information important in prehistory or history.

Determination of the importance of a resource in not always straightforward. Archaeological sites are nonrenewable resources. This fact alone, however, is not considered sufficient cause for protective land management policies. Regarding archaeological site importance specifically, according to Appendix K, Section III of CEQA:

...an important archaeological resource is one which:

A. is associated with an event or person of:
   1. Recognized significance in California or American history, or
   2. Recognized scientific importance in prehistory;

B. can provide information which is both of demonstrable public interest and useful in addressing scientific, consequential and reasonable or archaeological questions;

C. has a special or particular quality such as oldest, best example, largest, or last surviving example of its kind;

D. is a least 100 years old and possesses substantial stratigraphic integrity, or;

E. involves important resource questions that historical research has shown can be answered only with archaeological methods.

The basis for evaluating cultural resources that are both standing and subsurface as part of the complete historical record is founded in several existing laws and regulations. The Federal Section 106 compliance process, National Register of Historic Places criteria, the State Office of Historic Preservation (SHPO) and local planning ordinances all can impact a project. Application of the various regulations and guidelines depends upon the lead agency status and the permitting process. For purposes of this EIR, significant cultural resource impacts would occur if:

- significant historic structures are physically disturbed; or
- significant archaeological resources are disturbed.

Environmental Analysis

1. *Development accommodated by the Draft General Plan may result in the unearthing of, and possible disturbance to, subsurface historic structures and archaeological sites. (I)*

   Based on studies performed in the project area, there is considerable evidence of cultural resources, including possible prehistoric resource sites from Native American tribes known to have inhabited the project vicinity.

   If development associated with the Draft General Plan were to disturb an archaeological site or historical structure within the RUL, an adverse impact would occur. The importance of cultural resources/historic properties is assessed in several ways, including research value to scientists and educational, aesthetic, and/or cultural valuc to thc community at large and to Native Americans. Scientific importance of a site is not necessarily proportional to the number of museum quality artifacts that a site contains, but to the data that are generated from a site.

The Draft General Plan Policy Document contains policies consistent with State Historic Preservation Office (SHPO) procedures to mitigate any potential impact that may result from the development anticipated with the Draft General Plan. The City will enforce current federal and state procedures for identifying, preserving, and protecting prehistoric sites (Policy HR-6.1). The Draft General Plan recommends requiring investigation during the planning process for all proposed developments in archaeologically sensitive areas in order to determine whether prehistoric resources may be affected (Policy HR-6.2). The City will also continue to enforce state mandates through its standard mitigation requirements (Policy Resolution No. 27) that require developers and/or construction personnel, upon discovery of remains during construction of a project, to cease all activity until qualified professional archaeological examination and reburial in an appropriate manner is accomplished.

2. *Development accommodated by the Draft General Plan would not result in impacts to historic properties within the City. (I)*

Within the project area, there are 31 properties that have been identified by the National Register of Historic Places, one State of California Historic Landmark, and 26 properties that have been given a local landmark designation by the City pursuant to local preservation ordinances. The locations of infill development cannot be determined at this time. Therefore, specific impacts to historical structures cannot be determined. However, policies and implementation programs contained in the Draft General Plan Policy Document would help to preserve and protect historic structures and resources in the City. The Draft General Plan recommends identification of structures and resources considered part of the City's cultural heritage (Policy HR-1.2); continual updating and amendment of the City's historic resources inventory with intensive surveys (Policy HR-1.3); implementation of the State Historical Building Code to preserve historic resources consistent with protection of life and safety (Policy HR-1.6); and advocation of specific projects, legislation, and economic strategies that will realize preservation goals and policies (Policy HR-1.10).

Implementation Program HR-1.G recommends establishing procedures whereby properties on the list of architectural and historic resources are provided with alternatives to demolition. It is also recommended that the City adopt guidelines to guide rehabilitation, infill and new development in historic areas (Implementation Program HR-1.M). Endangered buildings would be sought out through programs developed to encourage their preservation and rehabilitation (Implementation Program HR-1.N).

In addition, the Land Use Element establishes policies for preservation of neighborhoods (Policy LU-1.1) and for recognizing the importance of historic properties districts as contributors to the City's identity (Policy LU-1.4). The land use designation of TRI (Traditional Residential) has been generally applied to potentially historic neighborhoods to further protect them from infill development that would be inconsistent in form and density with the existing pattern of development (Policy LU-4.1). The Land Use Element also includes policies that promote the long-term viability of historic neighborhoods and commercial areas by enhancing the physical relationship between the Downtown and surrounding neighborhoods (Implementation Program LU-10.B).

3. *The Draft General Plan provides for the identification and preservation of significant cultural and historical resources within the RUL. This preservation program will help to foster appreciation for the City's cultural heritage and significant historical and cultural resources. (B)*

When cultural or historical buildings, sites, and landscapes are demolished or taken away, the fabric of a city is damaged. Saving these cultural and historical elements makes sense for two reasons. From an economic perspective, restoration of a building or site can provide revenue to the local citizens and businesses. From a social perspective, preservation of historic neighborhoods, sites, and landscapes contributes to the diversity of a community and provides a variety of housing and recreation types for a wide range of the population at different stages of life.

Chapter 6, Historic Resources, of the Draft General Plan contains policies and programs that will support the preservation of the City's cultural and historical heritage. In particular, the City will identify historical buildings, sites, features, and districts that are reminders of past eras, events, and people; significant examples of architectural styles; irreplaceable assets; and examples of how past generations lived (Policy HR-1.1). The City will also identify and reinforce historic linkages between the natural and built environment (Policy HR-1.15) and encourage landscape plans that enhance historic areas (Policy HR-1.20). In cases where economic hardship is the deciding factor in determining preservation of a building or site, the City will investigate economic incentives involving historic federal, state, and local funding programs and/or loan and tax instruments (Policies HR-2.1 through HR-2.6).

3.6 VISUAL QUALITY

Existing Conditions

The Natural Setting

The City of Napa is located in the Napa Valley, which reaches north and east to the foothills and is relatively level and cultivated primarily with vineyards. Significant views available from public vantage points such as from SR 29 or from the Napa River area are of rolling hills and mountain ridges to the east and west that serve as a backdrop to the scenic valley floor. These distant views provide a sense of enclosure and a sense of place for the community and are important visual assets. In addition, the texture, pattern, and color of the vineyards outside of the City are dominant visual features, providing a sense of open space, and linking Napa to its agricultural heritage.

Riparian corridors are another important visual resource in the Napa area. Riparian corridors occur along the Napa River and its primary, secondary, and tertiary tributaries. These wooded areas extend inland from the river banks and function as linear oases among the residential subdivisions In addition, they serve to define boundaries among neighborhoods and provide visual relief and open space opportunities. In many areas throughout the RUL, however, the Napa River and its tributaries are largely hidden from view, and public access along the banks is discontinuous and unimproved.

The Built Environment

While the City of Napa is by most measures a medium-sized city, residents and visitors typically think of Napa as a small town. This perception is due in large part to the City's small-town visual qualities. These include the unique visual character of downtown Napa, embodied in the historic architectural elements of Main Street and the pastoral qualities of the riverfront, and the downtown's relative distance from SR 29.

Gateways. Key gateways, or major visual entrances into and exits from the City of Napa, have been identified at four locations (see Figure 1-3 of the Draft General Plan Policy Document). From the north, a sense of entering the community begins near the State Road (SR) 29 juncture with Oak Knoll Avenue. Southern gateways to the City are at the SR 221 and SR 121 interchanges with Imola Avenue. A fourth entryway exists from the east along SR 121 where Monticello Road adjoins the Silverado Trail. From these points, the physical form and character of the community become perceptible to the motorist.

Neighborhoods and Districts. Residential development in Napa can be described using seven neighborhood typologies which focus on the set of physical features and relationships shared by a given neighborhood unit. The neighborhood typologies are A) post-war tract subdivisions; B) estate residential; C) period tract subdivisions; D) ranchettes; E) deep lot subdivision; F) traditional neighborhoods; and G) attached unit residential.

Most arterials in Napa are lined by commercial businesses, many of which are organized in lower quality strip-type developments. These developments sometimes occur side by side with little or no architectural character or quality, resulting in a visual chaos of building forms, parking lots and unrelated signs.

Views. Roadways with important scenic qualities within the RUL include SR 29, Dry Creek Road north of Redwood Road; Redwood Road west of the Dry Creek Bridge; Big Ranch Road north of Trancas Street; Coombsville Road east of Silverado Junior High School; Thompson Avenue; El Centro from Jefferson Street to Big Ranch Road; Old Sonoma Road west of the city limits; and Patrick Road. These roadways serve as key vantage points to the open space, rolling hills, ridgelines, and wetlands that define Napa's visual character.

Napa's visual character is further described in Chapter 1, Land Use, of the Draft General Plan Background Report.

Impact Assessment and Mitigation

Significance Criteria

Potential impacts resulting from a change in the visual setting are often subjective. To some, any development and change to the existing setting, regardless of the design, is considered adverse; others may consider any development to be beneficial. This EIR identifies significance criteria based on CEQA and general urban design principles.

According to the CEQA Guidelines, Appendix G (a and b) and the Environmental Checklist Form, significant visual impacts would occur if the proposed project:

- conflicts with the adopted environmental plans and goals of the community; or
- results in a substantial, demonstrable negative aesthetic effect, such as obstruction of a scenic vista or the creation of an aesthetically offensive site open to public view.

Environmental Analysis

1. *The Draft General Plan would ensure the preservation and enhancement of the visual character of existing urban uses in the RUL by imposing design standards on infill development. (I)*

   Under the proposed project, a substantial amount of development would occur as infill on approximately 440 acres of vacant and underutilized land within the RUL. According to a 1994 survey, there are 858 acres of vacant land, of which only about half (438) is considered generally developable. These areas would be converted to urban uses under the proposed General Plan. Chapter 1, Land Use, of the Draft General Plan Policy Document establishes standards and policies for future development and redevelopment in Napa, focusing on growth that is consistent with the City's existing character and providing for the maintenance of open space.

   Maintenance and enhancement of Napa's small-town qualities and community identity is a key theme in the Draft General Plan (Goal LU-1). To achieve this goal, the General Plan Update Citizens Advisory Committee in conjunction with City staff developed seven neighborhood typologies to describe the physical components and relationships shared by neighborhood units throughout the City. These components include streetscape, architectural character, topography and density. New residential development would be required to be consistent with the general neighborhood typology of the surrounding area (Policies LU-4.1 and LU-4.5). This would ensure the preservation of the integrity of existing neighborhoods and that new neighborhoods share the

same qualities as the existing neighborhoods (Policy LU-1.2). In addition, the City would adopt land use regulations that recognize, maintain, and promote historic patterns of housing densities and urban form.

New commercial developments would be required to adhere to design guidelines to be developed by the City addressing placement, scale, massing, and parking area design. These guidelines would emphasize the siting of parking areas in areas less visible from the street, placement of buildings to define street edges and spaces, and a unified pedestrian environment (Implementation Program LU-5.A). In addition, the City would develop commercial and office area standards for landscaping, streetscaping, signage, lighting, street furniture, and other related features (Implementation Program LU-5.B). The City would ensure that new industrial development is designed and operated to minimize adverse visual characteristics, such as unscreened storage yards and glare (Policy LU-7.4).

Standard mitigations contained in Policy Resolution No. 27 would serve to implement several of these policies. Specifically, all new lighting are to be shielded to avoid glare, landscaping plans are required, and separate architectural review is necessary for any signage for a project.

For all development, the City would promote an urban form that integrates the urban environment with the City's natural features (Policy LU-9.1). Towards this objective, the City would use the development review process to identify opportunities for the protection of significant species and groves or clusters of trees on project sites (Policy NR-1.7 and Implementation Programs NR-1.A, NR-1.B, and NR-1.C).

Within the RUL, land used for agricultural and grazing purposes is located throughout the City in areas such as Stanly Ranch, Foster Road, Big Ranch Road, Wyatt Road, and Browns Valley hills. Smaller sites of one acre or less are dispersed throughout the City. More than half of this land would be converted to urban uses. These natural resource areas are important elements of the visual quality within the RUL, contributing to a sense of openness and small-town character.

Although infill development would occur on land that is currently vacant and, in some cases, used for marginal agricultural production, the development of some of these vacant areas would not be considered significant when compared to the fundamental purpose of the General Plan which is to preserve the open space and agricultural setting of the Napa Valley. The visual quality provided by the open space surrounding the City would continue to provide a context and visual identity for Napa.

2. *The Napa General Plan would enhance the visual setting in the downtown area, along key gateways, scenic corridors, crucial corridors, and major roadways in the City. (B)*

One of the goals of the Land Use Element (Chapter 1) of the Draft General Plan Policy Document is to improve the character of downtown Napa (Goal LU-6). This goal would be accomplished through a variety of measures that would enhance the visual environment including promotion of pedestrian-oriented retail and commercial development (Policy LU-6.1), improvement of building facades and exteriors consistent with the visual character of downtown (Policy LU-6.2), promotion of the rehabilitation and reuse of historic downtown structures (Policy LU-6.3), and removal of blighting conditions at key entry points to make downtown more inviting for residents and visitors (Policy LU-6.8). In addition, the City would promote riverfront development that reorients

downtown to the Napa River, thereby creating a scenic vista currently limited to public view (Policies LU-6.4 and LU-6.6).

Under the policies of the Draft General Plan, the City would also improve the appearance of key gateways to Napa. The City would refine the locations and concept of the key gateways and develop gateway and scenic corridor design guidelines for both public and private development to ensure attractive entrances to the City (Policy LU-1.5). The Draft General Plan designates SR 29, SR 121, and SR 221 as scenic corridors to be improved through undergrounding of utilities, increased landscaping, street tree planting, and other improvements (Policy LU-1.6). The Zoning Ordinance would be revised to include a Scenic Corridor Overlay Zone to apply to the scenic corridors (Implementation Program LU-1.B). In addition, the City would identify other major streets in the City which are important to the City's character, such as Soscol Avenue, and establish corridor streetscape design guidelines that will address adjacent land uses, signage, landscaping, street tree planting, and placement of public parking along these designated corridors (Implementation Program LU-1.C).

The Draft General Plan would also improve visual quality along crucial corridors in the City, identified in Chapter 3, Transportation, of the Draft Policy Document (Policy T-3.1) as:

- Imola Avenue West (SR 121) - from west of Lernhart Street to Soscol Avenue;
- Trancas Street - from SR 29 to Soscol Avenue;
- Lincoln Avenue - from Jefferson Street to Silverado Trail;
- Jefferson Street - from Trancas Street to Imola Avenue;
- Soscol Avenue - from north of Lincoln Avenue to Imola Avenue; and
- Silverado Trail (SR 121) - from Soscol Avenue to Trancas Street.

Along these corridors, the City would improve the appearance and internal integration of existing strip commercial areas by encouraging shared design features, shared signing, consistent landscape treatments across frontages, and other integrating features for new development or whenever an opportunity arises due to use changes within an existing strip area (Policy LU-5.2). Along all roadways, the City would encourage the siting of parking in areas less visible from the street (Policy LU-5.8).

3. *The proposed expansion of the RUL would not detract from the region's scenic resources. (I)*

The proposed project recommends the expansion of the RUL in ~~three~~ four areas: 13 acres west of Foster, northeast of the Big Ranch Road and Trancas Street intersection, northeast of Silverado Trail and Trancas Street and around the Napa State Hospital. The first area, west of Foster, is a small area on slopes greater than 30 percent. The area is at the southern end of a secondary ridge that extends from the Browns Valley Planning Area through the western flanks of the Pueblo and Westwood Planning Areas. The area is rural, with traditional subdivisions immediately to the north and half-acre parcels immediately to the south. Because the area is part of a larger visual unit that is already residentially developed, inclusion of this area for development at a proposed 0-2 units per net acre would not result in a substantial, demonstrable negative aesthetic effect.

The area northeast of Big Ranch Road and Trancas Street is currently developed with rural residences. This level area is flanked further to the north and east by non-crop agricultural uses and riparian vegetation. The northern and eastern boundaries of this RUL expansion area is a natural waterway. Lands beyond the creek are in intensive agricultural production. Accordingly, extension of urban development to the creek would not eliminate critical visual resources or agricultural activities. Furthermore, proposed development near the sensitive riparian vegetation would be limited to a proposed density of 0-2 units per acre and further subject to provisions of a Big Ranch Specific Plan and General Plan policies for riparian habitat protection.

The area at the northeast intersection of Silverado Trail and Trancas Street has been incorporated land under the City's jurisdiction since 1973 and is within the City's sphere of influence. Placing the RUL around this parcel allows for the RUL policies for properties adjacent to agricultural and open space lands that protect and buffer urban uses from agricultural uses, to be applied to development of this parcel. The designation of this parcel as TC, Tourist Commercial, allows for the most visually compatible urban use of visitor serving development which emphasizes the historic role of Napa Valley in viticulture.

The final expansion area encompasses the Napa State Hospital. Because this area is already built, inclusion of this area in the RUL would not alter the region's scenic setting.

4. *The Draft General Plan protects the scenic resources, especially the vineyards, that dominate the visual landscape. (B)*

The Draft General Plan recommends policies and programs to assure that the natural scenic resources that characterize the Napa Valley are protected from urban development. The RUL has been delineated to preclude urbanization of the region's vineyards, hillsides, grasslands, and major marshlands. In particular, Policy LU-9.5 provides the City with an opportunity to restrict development if the underlying land use designation is inconsistent with conservation of critical environmental resources. An explicit example cited in the Draft General Plan of such inconsistency is if the project site is adjacent to or close to (within 1/4 mile) of important agricultural resources or other areas devoted to permanent agricultural activities. Policy LU-9.2 reinforces this emphasis on integrating the urban environment with natural features by calling for the City to apply special development standards to proposed development within or adjacent to riparian corridors and wetlands, hillsides, critical habitats, and agricultural lands outside the RUL.

5. *The Draft General Plan is consistent with the Napa County General Plan's Scenic Highways Element regarding Scenic Highways. (I)*

The Napa County General Plan identifies two highways that occur within the City of Napa RUL as potential scenic highway corridors: SR 29 and SR 121. The Draft General Plan designates these same highways as scenic corridors within the RUL and identifies the need to improve the scenic character of these roadways through landscaping, utility undergrounding, street tree planting, and other improvements (Policy LU-1.6 and Policies LU-5.2 and LU-5.8 described above under Impact 2). The policies and implementation programs listed in Chapter 1, Land Use, of the Draft General Plan are consistent with those of the Napa County General Plan Scenic Highways Element. The county recommends that these scenic corridors be protected and enhanced by preserving existing trees and shrubbery, imposing design standards on billboards, undergrounding utilities, limiting strip commercial development, and requiring design review for projects within view.

APPENDIX E

3.7 BIOLOGICAL RESOURCES

Existing Conditions

There are 17 major vegetation communities and associated wildlife habitat types in the Napa area, according to *A Guide to Wildlife Habitats of California* (1988), developed and published by the California Interagency Wildlife Task Group. These communities include four types of wooded areas, grasslands, chaparral, three types of wetlands and others. The most predominant communities within the RUL which are likely to be impacted by development (the valley foothill riparian habitat, wetlands, and grasslands) are described below. In addition, sensitive species which occur within the RUL are discussed below.

Habitats within and in the vicinity of the City's RUL are described in detail in Chapter 7, Natural Resources, of the Draft General Plan Background Report.

The Valley Foothill Riparian Habitat

The best example of the Valley Foothill Riparian habitat in the Napa region occurs along the Napa River and its primary, secondary, and tertiary tributaries or streams. At one time, a dense canopy of riparian habitat dominated by cottonwoods and willows lined the banks of the Napa River, but most of the remaining vegetation exists only within the river channel (i.e., below the tops of the banks). Within the City and environs, tributaries of the Napa River have also experienced destruction of native riparian habitat. A 1985 inventory of streambank erosion showed several areas of eroded streambanks ranging from moderate to severe.

Within the City, channelization and urban development have significantly modified the Napa River's original dense riparian forest so that only remnant patches remain. Large amounts of rip-rap protect the bank slopes in the lower third of the river within the City and support only a sparse cover of grasses and weeds. In other areas, exotic trees (acacia, eucalyptus, etc.) have replaced the native species.

The riparian habitat that remains within the City consists mostly of scrub/shrub and herbaceous vegetation with small patches of brackish marsh. Throughout downtown Napa, riprap or concrete rubble covers much of the river bank and is vegetated with herbs and shrubs. Further downstream, oak and mixed woodlands line the banks. Finally, as the river nears its mouth at San Pablo Bay, it is flanked by diked pasturelands (historical wetlands) and tidal marsh.

Fish such as striped bass, Chinook salmon, sturgeon, yellowfin goby, splittail and inland silversides occur in the river. The California Department of Fish and Game (CDFG) has identified the Napa River and six of its tributaries as migration routes, nursery habitat and spawning grounds for steelhead trout, including Napa, Redwood, Milliken, Tulocay, Browns Valley, and Sarco Creeks.

Wetlands

There are three types of wetland habitats in the Napa Valley, including freshwater emergent wetlands, saline (or saltwater) emergent wetlands, and seasonal wetlands. These types of wetlands occur throughout the Napa region primarily along native creeks and in the bottom lands of the Napa Valley.

Freshwater emergent wetlands occur in the City and environs in proximity to fresh water bodies, creeks, and in the upper portions of the Napa River above Lincoln Avenue. Brackish marshes occur along the margins of those portions of the Napa River under tidal influence for portions of the year (predominantly north of Horseshoe Bend and south of Lincoln Avenue). The saltwater marshes that are influenced by tidal fluctuations throughout the year on the Napa River occur south of Horseshoe Bend at the mouth of Soscol Creek to the San Pablo Bay.

The saltmarsh areas/slough systems of the Napa River provide valuable wildlife habitat such as nursery and feeding areas for the river's fish populations. In fact, the marshlands support more than 20 fish species, many of which find habitat in the lower Napa River. The striped bass nursery grounds is one of the major such habitats in the Sacramento-San Joaquin River system. The saltmarshes also are a major wintering ground along the Pacific Flyway for water fowl and support numerous shorebirds. The California clapper rail, a federally and state-listed endangered species, inhabits the Napa marsh, as does the weasel and the salt marsh harvest mouse, which is also a federal and state-listed endangered species. A federally listed endangered plant, soft bird's beak, also occurs in the Napa marsh, which is one of only about 10 remaining locations of this species.

Portions of the Stanly Ranch, the Airport North Industrial Area, and other lands south of the City (generally within the 100-year floodplain) historically were marshlands subject to the Napa River's natural tidal action. Filling and flood control projects have greatly reduced the amount of original saltwater marshland.

In the vicinity of the City, some brackish marsh remains north of Horseshoe Bend; however, most of the true saltmarsh areas occur south of the bend, outside Napa city limits. The only true remaining tidal saltmarsh in the area is at the mouth of Soscol Creek just outside the southern boundary of the City. Remaining undisturbed marsh areas are potentially restorable.

Seasonal wetlands and vernal pools can be found in the Napa River floodplain and its larger tributaries and in the vicinity of freshwater bodies within the planning area. A vernal pool is a shallow seasonal wetland habitat unique to west coast states that supports numerous plant species which occur in no other habitat. Several sensitive plant species can be found in vernal pools, such as dwarf downingia, Contra Costa goldfields, Sonoma sunshine, and legenere. Fairy shrimp are often found in vernal pools, and the pools provide potential foraging habitat for insect-eating birds (such as cliff swallows) and bats.

Numerous vernal pools/swale complexes are known to occur north of Green Island Road (south of the City). A particularly large one occurs on the east side of Highway 221 just outside the southeast limits of the City's RUL. This vernal pool is reported to have a population of Contra Costa goldfields, which is a federally proposed endangered plant.

Seasonal wetlands are of particularly high value to several wildlife species. Ducks such as mallards, shorebirds such as killdeer and greater yellowlegs, and songbirds such as American pipit and red-tailed blackbirds use these areas for foraging. The grasses in seasonal wetlands often remain green and set seed later than surrounding upland areas, thereby providing seeds for species such as the western harvest mouse and house finch.

Grasslands

The grassland vegetation community and habitat is composed of various annual grasses and herbs, and covers much of Napa's undeveloped, treeless valley bottomlands, foothills, and south-facing slopes.

There are two types of grassland habitat types in the Napa region, annual valley (non-native) grasslands and perennial valley (native) grasslands. The annual valley grassland is by far the most common of the grassland types in the Napa region and throughout the state and is now considered a naturalized plant community. The perennial valley grasslands are limited to relic stands of limited size.

The annual grasslands in the Napa Valley consist of expanses of predominantly non-native annual grasses and forbs. The perennial valley grassland type is dominated by native perennial grasses which remain green throughout the year, but typically contain a large component of annual grasses and forbs.

Grassland areas that remain within the RUL generally occur in hillside areas or in a patchwork of vacant or undeveloped parcels surrounded by urban development. Although lands within the RUL are intended primarily for urban development, the retention of some grassland, as well as chaparral and woodland, is a factor in preventing erosion and land instability and preserving the City's scenic qualities.

Sensitive Habitats and Species

The RUL contains wetland, riparian and woodland habitats that are known to have the potential to host sensitive plant and animal species. About 19 sensitive plant and wildlife species are known to occur in the Napa area (see Table 3.7-1). The only two sensitive plants known to occur in the RUL are Mason's lilaeopsis (*Lilaeopsis masonii*), a state-listed rare plant, and Contra Costa goldfields (*Lasthenia conjugens*), a federally proposed endangered plant. Mason's lilaeopsis is a small semi-aquatic plant that grows in the silt-filled cracks of old rotting dock pilings along the Napa River. Contra Costa goldfields is a small plant with a bright yellow flower often forming clusters or carpets of bright yellow in the early spring. It is known to occur in vernal pools and valley foothill grasslands in the southern portion of the planning area near Soscol Creek. It also occurs north of the City's planning area along the Silverado Trail north of Soda Creek. Another federally proposed endangered species, soft bird's beak (*Cordylanthus mollis ssp. mollis)*, has been sighted in the Napa Marsh south of the City's planning area.

A number of rare or endangered animals have ranges or habitats in the RUL, but the only sensitive animals reported are the salt marsh harvest mouse (*Rethrodontomys ravientris*), a federally and state-listed endangered mammal, and the clapper rail (*Rallus longirostris obsoletus)*, a federally and state-listed endangered bird, both of which have been sighted in the Napa Marsh. The California red-legged frog (*Rana aurora draytonii*) is a federally-listed threatened species with a habitat range that includes the Napa area. Suitable habitat for the frog occurs in some of the upper creek channels of the Napa area.

Plant and animal species are designated as sensitive because of their overall rarity, endangerment, restricted distribution, and/or unique habitat requirements. Federal and state Endangered Species Acts prohibit harming endangered and threatened animal species. Sensitive plant communities and wildlife habitats are recognized by the City of Napa, California Department of Fish and Game, U.S. Fish and Wildlife Service, and/or other federal and state agencies.

Table 3.7-1
Sensitive Plant and Wildlife Species
Known to Occur in the Napa Area[1]

Species	Status[2]	Habitat and Reported Localities in the Area
Plants		
Ceanothus divergens (Calistoga Ceanothus)	USFWS: FSC CDFG: None CNPS: 1B, 3-2-3	Serpentine soils of chaparral, known to occur in hills east and west of Napa
Cordylanthus mollis ssp. mollis (Soft Bird's Beak)	USFWS:FPE CDFG: SR CNPS: 1B, 3-2-3	Coastal salt marshes; only 10 remaining occurrences, including Napa Marsh
Downingia pusilla (Dwarf Downingia)	USFWS: None CDFG: None CNPS: 2, 1-2-1	Vernal pools and valley foothill grasslands, known to occur near Horseshoe Bend
Hesperolinon breweri (Brewer's Western Flax)	USFWS: FSC CDFG: None CNPS: 1B, 2-2-3	Serpentine soils of chaparral and valley foothill grasslands, known to occur in the Suscol Creek area
Lasthenia conjugens (Contra Costa Goldfields)	USFWS: FPE CDFG: None CNPS: 1B, 3-3-3	Vernal pools and valley foothill grasslands, known to occur near Suscol Creek and on the Silverado Trail north of Soda Creek
Lilaeopsis masonii (Mason's Lilaeopsis)	USFWS: FSC CDFG: SR CNPS: 1B, 2-2-3	Brackish marshes, known to occur in the Napa River from near Lincoln Ave. downstream to near Suscol Creek
Trifolium amoenum (Showy Indian Clover)	USFWS: FPE CDFG: None CNPS: 1B, 3-3-3	Valley Foothill Grasslands; last seen in 1969, rediscovered in 1993 in Sonoma County; former distribution in Napa
Wildlife		
Birds		
Accipiter cooperi (Cooper's Hawk)	USFWS: None CDFG: CSC	Nesting in riparian habitats, sighted in the wetland and riparian habitats of Kennedy Park and may occur in other riparian habitats in the Napa area
Accipter striatus (Sharp-shinned Hawk)	USFWS: None CDFG: CSC	Nests in riparian habitats, sighted in Kennedy Park and may occur in other riparian habitats in the Napa area
Circus cyaneus (Northern Harrier)	USFWS: None CDFG: CSC	Nests in tall grasses and sedges of seasonal wetlands and grasslands, sighted in Kennedy Park
Dendroica petechia brewsteri (Yellow Warbler)	USFWS: None CDFG: CSC	Nests in riparian habitats, sighted in Kennedy Park and may occur in other riparian habitats in the Napa area

Table 3.7-1 (continued)
Sensitive Plant and Wildlife Species
Known to Occur in the Napa Area[1]

Species	Status[2]	Habitat and Reported Localities in the Area
Wildlife (continued)		
Birds (continued)		
Icteria virens (Yellow-breasted Chat)	USFWS: None CDFG: CSC	Nests in riparian habitats, known to nest in Napa County and may occur in Napa in riparian habitats
Rallus longirostris obsoletus (California Clapper Rail)	USFWS: FE CDFG: SE	Occurs in salt marshes and brackish marshes along California coast; breeding only in SF Bay area; inhabits Napa Marsh
Speotyto cunicularia (Burrowing Owl)	USFWS: None CDFG: CSC	Grasslands with ground squirrel burrows, reported sighting at Alston Park but not nesting
Strix occidentalis caurina (Northern Spotted Owl)	USFWS: FT CDFG: None	Old growth coniferous forest, reported in 1990 on slopes above Dry Creek, approximately 2 miles north of Alston Park
Amphibians		
Rana aurora draytonii (California Red-legged Frog)	USFWS: FT CDFG: CSC	In ponds and deep pools along creeks with dense vegetation cover; Napa is within this species range and suitable habitat occurs in some of the upper creek channels
Rana boylii (Foothill Yellow-legged Frog)	USFWS: FSC CDFG: CSC	Occurs in shaded rocky streams with shallow water, Napa is within this species range and suitable habitat occurs in some of the upper creek channels
Mammals		
Rethrodontomys ravientris (Salt Marsh Harvest Mouse)	USFWS: FE CDFG: SE	Salt marshes of San Pablo Bay; inhabits Napa Marsh
Crustaceans		
Syncaris pacifica (California Freshwater Shrimp)	USFWS: FE CDFG: SE	Creeks and streams with overhangs and clear water, reported in Huichica Creek south of the Napa area

[1] Sources: CDFG 1991, July 1996; City of Napa 1986a, 1991, 1992b; Phillip Williams Associates 1990; Skinner, M.W. and B.M. Pavlik 1994; U.S.FWS 1996.

[2] Status:

FEDERAL DESIGNATIONS

FE	Listed as Endangered by the Federal Government
FT	Listed as Threatened by the Federal Government
FPE	Proposed as Endangered by the Federal Government
FPT	Proposed as Threatened by the Federal Government
C	Candidate for Federal listing (Taxa for which U.S. Fish and Wildlife Services has sufficient biological information to support a proposal to list as Endangered or Threatened)
FSC	Federal Species of Concern (No legal status)

Table 3.7-1 (continued)

Sensitive Plant and Wildlife Species Known to Occur in the Napa Area[1]

[2] Status:(continued)

CALIFORNIA DEPARTMENT OF FISH AND GAME DESIGNATIONS

SE	Listed as Endangered by the State of California
ST	Listed as Threatened by the State of California
SCE	California candidate for listing as endangered
SR	Listed as rare; not yet a candidate for other listings
CSC	CDFG "Species of Special Concern"

CALIFORNIA NATIVE PLANT SOCIETY DESIGNATIONS (SKINNER & PAVLIK, 1994)

List	1	=	Plants of highest priority
	1A	=	Plants presumed extinct in California
	1B	=	Plants rare and endangered in California and elsewhere
List	2	=	Plants rare and endangered in California, but common elsewhere
List	3	=	Plants about which we need more information
List	4	=	Plants of limited distribution (A watch list)

CNPS R-E-D Code

R (Rarity)

1 = Rare, but found in sufficient numbers and distributed widely enough that the potential for extinction or extirpation is low at this time.

2 = Occurrence confined to several populations or to one extended population.

3 = Occurrence limited to one or a few highly restricted populations, or present in such numbers that it is seldom reported.

E (Endangerment)		D (Distribution)	
1 =	Not endangered	1 =	More or less widespread outside California
2 =	Endangered in a portion of its range	2 =	Rare outside California
3 =	Endangered throughout its range	3 =	Endemic to California

Impact Assessment and Mitigation

Significance Criteria

Pursuant to Section 15065 of the CEQA Guidelines (Mandatory Findings of Significance), significant biological effects are defined as those in which the proposed project would:

- substantially reduce the habitat of a fish and wildlife species;
- cause a fish or wildlife population to drop below self-sustaining levels;
- threaten to eliminate a plant or animal community;
- reduce the number or restrict the range of an endangered, rare or threatened species.

~~• substantially affect a rare or endangered plant or animal species or the habitat of the species;~~

~~• substantially diminish native habitat for wildlife or plants; or~~

~~• diminish the area or quality of a jurisdictional wetland.~~

Environmental Analysis

1. *One proposed endangered plant species (Contra Costa goldfields) and one rare plant species (Mason's lilaeopsis) are known to exist in areas proposed for urban development, and other sensitive species, such as the California red-legged frog, may occur in proposed development areas. The development contemplated by the General Plan may result in unavoidable significant impacts to rare and endangered plant and/or animal species that may exist within the RUL. The policies and programs of the General Plan cannot guarantee the avoidance of all adverse effects on listed species, the existence and location of which is not specifically known at the time of General Plan adoption. (S)* ~~*However, existing federal and state laws and proposed policies in the Draft General Plan could avoid or minimize disturbance to these species. (I)*~~

   The federally proposed endangered plant species Contra Costa goldfields *(Lasthenia conjugens)* occurs in the southern tip of the RUL and could be adversely impacted, or its habitat could be adversely impacted, by development in the southern portion of the River East Planning Area. Mason's lilaeopsis *(Lilaeopsis masonii)*, a California-listed rare plant which occurs in the Napa River in the southern portion of the RUL, could be adversely impacted by development in the western portion of the River East Planning Area, the southeastern portion of the Central Napa Planning Area, or the northern portion of the Stanly Ranch Planning Area. The California red-legged frog (*Rana aurora draytonii*), a federally listed threatened species, has a habitat range which extends into the Napa area, but it is not known whether the frog inhabits specific areas planned for development.

   However, federal and state Endangered Species Acts prohibit harming endangered or threatened plant, fish, and wildlife species. While the Contra Costa goldfields has been reported to occur in the southern portion of the RUL and Mason's lilaeopsis has been reported to occur along stretches

of the southern portion of the Napa River, their exact locations and habitats, as well as those of any other sensitive species, would be determined prior to preparation of any development plans for areas where they may occur.

Potential impacts to the individual sensitive species or their habitats could be avoided or mitigated to an insignificant level by the following provisions of the Draft General Plan. One of the goals of the Natural Resources Element provides that the City recognize and support the preservation of rare, endangered, and threatened species and other unique and fragile biological elements (Goal NR-2). This goal could steer development away from the habitat of these sensitive species and any others which occur in the development area. To allow developers, while in initial planning stages, to select areas which are not likely to conflict with the protection of these species, the City will maintain information about the location of rare, endangered and threatened species (Policy NR-2.1).

Proposals for development in any areas with sensitive species would continue to be referred to state and federal wildlife agencies for review and comment (Policy NR-2.3). State and federal laws require development plans in such areas to include all appropriate analyses and mitigation plans.

The City has stated a specific interest in protecting riparian habitat along the Napa River (Policy NR-1.1), which is likely to provide added protection for Mason's lilaeopsis and any possible occurrences of the California red-legged frog. The Draft General Plan calls for protection of riparian habitat during waterway improvement projects (Policy NR-1.4), protection of existing wildlife habitat corridors (Policy NR-1.2), possible restoration of riparian habitats (Policy NR-1.5), protection of onsite habitat wherever possible (Policy NR-1.6), and controlled public access in riparian areas on public lands (Policy NR-1.8).

In considering the RDEIR Comment 49.3 from the Regional Water Quality Control Board (4/24/98) RDEIR Response to Comments pg. 14), the City decided that there was enough uncertainty as to the existence and location of endangered species to justify characterizing the environmental conclusion regarding endangered species as an unavoidable significant impact (Response to Comment 49.3 & Addendum #12,). The City determined that it would be beneficial to clarify policies in the General Plan related to sensitive species and habitats and to refine mitigation in the form of implementation programs in the Natural Resource Element to ensure that the process for project level environmental review includes triggers for early review of the potential impact to endangered species and that accurate information is available on which to base a future CEQA decision (General Plan Policy Document pg. 7-6, NR-2.4, NR-2.A, NR-2.B)

Even with this additional mitigation, the potential for impact is uncertain and, as a theoretical matter, is considered to be significant and unavoidable.

(Text Revision for 12/98 FEIR – Double Underline / Strikethrough)

2. *Sensitive salt marsh species, including federal and state-listed endangered species, could be disturbed by development activity in the southern portion of the Stanly Ranch Planning Area. Policies and implementation programs contained in the Draft General Plan acknowledge these potential impacts and would serve to avoid or reduce the effects to an insignificant level. (I)*

Numerous sensitive salt marsh species occur in the salt marsh along the Napa River. These include a plant species, soft bird's beak (*Cordylanthus mollis ssp. mollis*), and two animal species, the salt marsh harvest mouse (*Rethrodontomys ravientris*), and the California clapper rail (*Rallus longirostris obsoletus*). Potential impacts to these species as well as the need for costly mitigation measures can be avoided by not developing any portion of a jurisdictional salt marsh. Figure 1-15 in the General Plan Policy Document designates the sensitive salt marsh areas of Stanly Ranch as PS-Public Serving. This designation provides for the preservation of large open space and resource areas.

Impacts to salt marshes and their sensitive inhabitants would be avoided or mitigated to an insignificant level through goals and policies included in the Draft General Plan (Except as described under Impact 1 above). Specifically, the same goals and policies identified in Impact 1 above apply to protection of sensitive salt marsh species in Napa. Under these provisions, the City would provide information on the boundaries of salt marshes to discourage development in salt marsh habitats.

In addition, the City will apply special development standards to wetlands and critical wildlife habitat (along with other areas), including salt marshes (Policy LU-9.2). The City will review and modify existing regulations for the conservation and management of marsh, wetland, riparian, wildlife and plant habitats to ensure consistency with the General Plan (Implementation Program NR-1.A). Through this measure, the City can clarify its intent to avoid development of salt marsh habitat. In salt marshes where development may be unavoidable, the City will continue to refer development proposals to state and federal wildlife agencies for review and comment (Policy NR-2.3).

3. *Environmentally sensitive sites could be impacted by nearby development. However, proposed policies in the Draft General Plan would serve to avoid or reduce these effects. (I)*

Policy LU-9.3 states that, "The City shall encourage the maintenance of wildlife corridors and discourage the fragmentation of large natural plant communities when environmentally sensitive sites are developed." While this policy expresses an intent to maintain undivided natural areas, it implies that development may occur on sites with sensitive resources.

Policies have been included in the General Plan to provide alternative land use standards in order to integrate urban development with natural features (Goal LU-9, Policy LU-9.1) and reduce impacts to a less than significant level. Policy LU-9.2 promotes the continued use of special development standards for sensitive habitat areas. Policy LU-9.3 encourages the maintenance of remaining wildlife corridors and discourages the fragmentation of significant natural communities. Policy LU-9.4 encourages cluster development to separate sensitive areas from development. Policy LU-9.5 allows for density reduction if it is found that there is a specific environmental resource that would be affected by development of the projected density assigned by the General Plan. Implementation of all of these measures would reduce impacts to an insignificant level.

4. *Native terrestrial vegetation and habitats within the RUL could be damaged or eliminated by development. However, proposed policies in the Draft General Plan would serve to avoid or reduce these effects. (I)*

Much of the area available for development in the RUL is non-native grassland. However, some upland areas within the RUL retain some native vegetation, such as the chaparral communities and a few relic native grasslands. Some of these areas with both native and non-native vegetation may be displaced by development, and some may be temporarily impacted.

These impacts may be mitigated to an insignificant level by the following provisions in the Draft General Plan. The City plans to manage the natural resources and open space areas in and around the City to preserve and enhance plant and wildlife habitats (Goal NR-1). The City also will encourage the planting of native species in natural habitats (Policy NR-1.3). As a condition of approval by the City, development must provide protection for significant onsite natural habitat whenever possible (Policy NR-1.6). If avoidance is not possible, the City would permit equivalent mitigation off-site. During the development review, the City will also try to identify and protect significant species and groves or clusters of trees on projects sites (Policy NR-1.7).

3.8 GEOLOGY, SOILS, AND SEISMICITY

Existing Conditions

The City of Napa is located in a 35-mile long, northwest trending valley of the Northern Coastal Range. The valley, formed by regional folding and faulting, is flanked on the east by the Howell Mountains (1,500 feet) and on the west by the Mayacamas Mountains (2,000 feet). The eastern and western upland portions of this area have elevations that exceed 600 feet. Slopes on the valley floor are generally less than 5 percent, while those in the uplands commonly range from 5 to 30 percent.

The Coast Ranges, which traverse northern California in a northwest to southwest direction, are characterized by numerous active faults. The active regional fault zones that have potential to affect the Napa area include the San Andreas, the Hayward, the Calaveras, and the Healdsburg-Rodgers Creek faults, all capable of earthquakes in excess of 7.0 on the Richter Scale. There are three active faults within Napa County. From east to west, these faults are the Cordelia, the Green Valley, and the West Napa. It is estimated that these faults are capable of producing earthquakes with a Richter magnitude of up to 6.75, which translates to a VIII–IX on the Modified Mercalli Intensity Scale (County of Napa 1992). The Modified Mercalli Intensity Scale is divided into 12 levels of intensity; I is a barely perceptible effect whereas XII suggests catastrophic damage. The scale is generally subjective, based on personal observations of people who felt the earthquake.

Liquefaction results from groundshaking and is defined as the transformation from a solid to a liquid state as a result of increased pore pressure and reduced effective stress due to earthquake vibration. A soil's susceptibility to liquefaction is primarily a function of age, density, depth of sediment, and depth to groundwater. The poorly consolidated younger alluvium that occupies areas south of the City and along the Napa River roughly correspond to the historic marshland and consists of Holocene Alluvium and Bay Muds that may be subject to liquefaction or subsidence. Younger soils found on the Valley floor in the western portion of the City are also subject to potential liquefaction.

Most of the Napa area's unstable slopes are located on the west side of the valley in conjunction with weaker, less consolidated sedimentary rock. The volcanic base rock of the east side allows nearly vertical slopes to be considered stable. Within the RUL, the steepest slopes are found in the hilly areas west of Buhman Avenue and south of the Rollingwood subdivisions, north of Browns Valley Road and east of Pinewood Drive, and along (both inside and outside) the RUL from Browns Valley Road south to Highway 12/121. The hills surrounding the Browns Valley area to the west are particularly susceptible to landslides. *Further background information regarding geologic, soil, and seismic conditions in the RUL is available in Chapter 7, Health and Safety. of the Draft General Plan Background report.*

Impact Assessment and Mitigation

Significance Criteria

In the RUL, soil properties and proximity to active earthquake fault zones are the geotechnical factors of principal concern. The following geotechnical and seismic conditions would constitute significant impacts:

- Alteration of landforms that substantially change the topography or ground surface relief features.
- Pursuant to the CEQA Guidelines, Appendix G (r), exposure of people or structures to major geologic hazards, including earthquakes, landslides, mudslides, ground failure, or similar hazards such as settlement and groundshaking.

Environmental Analysis

1. *Development accommodated by the Draft General Plan would be susceptible to potentially strong groundshaking from earthquakes. The Draft General Plan would, however, minimize these risks to an acceptable level. (I)*

   The San Andreas, the Hayward, the Calaveras, and the Healdsburg-Rodgers Creek faults are all located within approximately 35 miles of the City and could potentially expose residents to earthquakes of magnitude 7.0 on the Richter Scale. The Cordelia, Green Valley, and West Napa faults are three locally active faults that could produce earthquakes of up to 6.75 on the Richter Scale. Earthquake-generated groundshaking from these faults (Modified Mercalli Scale intensities of IX-XII) can cause both structural and nonstructural hazards such as falling ceilings and light fixtures, toppling exterior parapets, shattered glass, and the dislodging of furniture and equipment.

   Chapter 8, Health and Safety, of the Draft General Plan acknowledges these hazards to public safety and recommends policies and programs to minimize risks from seismic events. In particular, the Draft General Plan recommends requiring all new buildings to conform to the structural and seismic requirements of the most recently adopted edition of the Uniform Building Code (Policy HS-1.1 and Policy Resolution No. 27). The City will discourage the siting of facilities necessary for emergency services, major utility lines and facilities, manufacturing plants using or storing hazardous materials, high occupancy structures, or facilities housing dependent populations within areas subject to very strong, violent, or very violent groundshaking (Policy HS-1.2). Soils and geologic studies are required for development proposals with large client populations within areas subject to very strong, violent, or very violent ground shaking (Policy HS-1.3 and Policy Resolution No. 27). Special construction features are required in the design of structures where site investigations confirm potential seismic hazards (Policy HS-1.4). The Draft General Plan also encourages the study and rehabilitation of high occupancy structures susceptible to collapse or failure during an earthquake (Policy HS-1.6).

2. *Development accommodated by the Draft General Plan would be susceptible to liquefaction hazards. The Draft General Plan would, however, minimize these hazards to an acceptable level. (I)*

   Effects of liquefaction can range from minor settling of foundations and structures to severe subsidence. Liquefaction hazards occur generally along the length of Napa Creek, along Redwood Creek north to Redwood Road, along Browns Valley Creek west to Thompson Avenue, along the Napa River from Trancas Street south to John F. Kennedy Memorial Park, and in the southernmost portion of the City's RUL, below State Route 29. These areas are known to consist of Holocene Alluvium (HA) and Bay Muds (Qbm) that may be subject to liquefaction or subsidence.

The same policies and implementation programs discussed in Impact 1 above apply to this impact and would serve to minimize impacts of liquefaction hazards on new development to an insignificant level.

3. *Development accommodated by the Draft General Plan and located on slopes of 15 percent or greater would be exposed to risks of erosion and landslides. However, policies and implementation programs contained in the General Plan would reduce these risks to an insignificant level. (I)*

Areas of landslide susceptibility and steep slopes (15 percent slope or greater) generally occur together within the same portions of the RUL; along the western edges of Planning Areas 3 (Browns Valley) and 7 (Westwood), along the eastern periphery of Planning Area 6 (Alta Heights), and in the eastern portion of Planning Area 11 (River East). Soils are generally susceptible to erosion on steep slopes, particularly if vegetation is removed. Landslides are the most dramatic and obvious form of erosion and vary in size from large blocks of material and slumps to relatively small amounts of surface debris. The majority of these areas are built-out with very low proposed development densities (0-2 dwelling units per acre) or no proposed development. This minimizes the potential risks of landslides and erosion in these areas.

In addition, policies and implementation programs contained in Chapter 8, Health and Safety, of the Draft General Plan would help to minimize the risk of erosion and landslides in those portions of the RUL containing steep slopes. In particular, the Draft General Plan recommends that new development minimize grading and impermeable surfaces in high-erosion areas (Policy HS-2.1 and Implementation Program HS-2.A). The Plan also recommends preparation of erosion control plans on slopes of 15 percent or greater (Policy HS-2.4 and Implementation Program HS-2.C) and investigation and adoption of required geotechnical studies in areas with high susceptibility to landslides and erosion (Implementation Program HS-2.B). Standard mitigations in the City's Policy Resolution No. 27 implement these policies. Such measures include adherence to the City's Public Works Department Standard Specifications (related to grading, trenching, backfilling, and compaction operations), requirement to secure approved erosion and sediment control plans, hydroseeding of all disturbed slopes, and compliance with design and construction criteria recommended in project-specific Soils Investigation/Geotechnical Reports.

APPENDIX E

3.9 HYDROLOGY AND WATER QUALITY

Existing Conditions

Napa County is located in the Coast Range of northern California. The major surface hydrologic feature of this area is the Napa River which flows from Mount St. Helena to San Pablo Bay. The river runs approximately 40 miles in length through mountains, vineyards, pastures, urban and industrial development, and marshlands. The Napa River tends to carry a considerable amount of sediment and drains a watershed of 426 square miles. All but the southern 3.4 miles of the river lie in Napa County. Notable natural drainageways occurring in the RUL are Napa Creek, Browns Valley Creek, and Redwood Creek.

The Regional Water Quality Control Board establishes "water quality objectives," the minimum quality that must be met to support a designated use. Within the RUL, water quality objectives are mostly satisfied for the Napa River. A 1973 study of groundwater quality data by the U.S. Geological Survey showed that the Napa Valley's groundwater was generally of good quality but with high levels of sodium, boron, chloride and iron.

In 1950, the U.S. Army Corps of Engineers (COE) completed a navigation channel, making the river navigable from San Pablo Bay to Third Street in downtown Napa. The natural siltation process necessitates periodic dredging of the lower reaches of the river in the navigation channel. Since completion of the channel in 1950, the COE has dredged the river a total of four times.

Within the City of Napa, the lower portion of the Napa River can be characterized as a tidal influenced estuarine system. Upstream of Trancas Street, the Napa River is largely freshwater. As the river proceeds through the City, the water quality transitions from fresh to brackish. Tidal influences on the river affect both discharges to San Pablo Bay and water surface elevations extending upstream approximately one-half mile north of the City.

Flood events in Napa have been recorded since 1892. Historically, the most significant flood events occurred in 1940, 1942, 1955, 1960, 1963, 1965, 1967, 1973, 1979, 1982, 1983, and most recently in February 1986. Major floods have resulted in damage to commercial, industrial, residential, and agricultural areas. Flooding in the City occurs when the Napa River's flow at Oak Knoll Avenue (just north of the city limits) exceeds about 15,000 cubic feet per second. Some areas (typically agricultural land) remain flooded for several weeks due to inadequate drainage, but one to three days under water is more typical. Flood hazard conditions exist along the entire length of the Napa River as it flows through the City as well as along the course of several tributary creeks. *Further background information regarding the area's hydrology and water quality is available in Chapter 7, Natural Resources, and Chapter 8, Health and Safety, of the Draft General Plan Background Report.*

Impact Assessment and Mitigation

Significance Criteria

The Draft Napa General Plan would be considered to have significant adverse water quality or hydrologic impacts if development permitted by the plan would cause:

- substantial flooding, pursuant to CEQA Guidelines, Appendix G (q);
- exposure of life and property to increased flood hazards as defined by the Federal Emergency Management Agency (FEMA).
- substantial degradation of water quality (including siltation from erosion), pursuant to CEQA Guidelines, Appendix G (f and q);
- substantial interference with groundwater recharge, pursuant to CEQA Guidelines, Appendix G (I); and
- destruction of natural drainageways.

Environmental Analysis

1. *Development accommodated by the Draft General Plan would occur within the 100-year floodplain of the Napa River. However, adherence to Federal Emergency Management Agency (FEMA) regulations and participation in the National Flood Insurance Program would minimize potential flood hazards. (I)*

   Development occurring within the 100-year floodplain of the Napa River would be exposed to potential flood hazards, but the risks would be minimized by adherence to FEMA regulations and participation in the National Flood Insurance Program, as required by policies and implementation programs in Chapter 8, Health and Safety, of the Draft General Plan. The Draft General Plan recommends continued provision of floodplain management to protect development within the 100-year floodplain of the Napa River (Policy HS-3.1) and continued participation in FEMA's flood insurance program (Policy HS-3.3). One of the City's standard mitigation measures related to water (see Policy Resolution No. 27) requires developers of areas in the flood hazard or floodway areas of the Napa River or its tributaries to obtain Certifications of Compliance with Public Works Department flood zone development requirements from a registered architect or civil engineer. The Plan also recommends continued assistance to the Army Corps of Engineers, Napa County and the public to fund and develop a Napa River Flood Control project if it is acceptable environmentally and financially (Policy HS-3.7). If the flood control management program is found to be infeasible, an evaluation of alternative means of addressing Napa River flooding will be developed that would allow development in areas currently constrained by floodplain, Flood Evacuation Area, or Floodway designations (Policy HS-3.9).

2. *Development accommodated by the Draft General Plan would add minimal runoff volumes to the City's stormwater drainage system. (I)*

The majority of land within the City's RUL is urbanized. The amount of additional impervious surface from new development would be minimal. Accordingly, additional stormwater runoff volumes and potential pollutant loading would be insignificant. In addition, policies and implementation programs contained in Chapter 4, Community Services, of the Draft General Plan would serve to keep potential storm drainage impacts at less than significant levels. The major recommendations considered in these policies and programs include continued collection of Storm Water System Service fees for needed storm drainage improvements and maintenance (Policy CS-11.2) and investigating the potential for impact fee collection to help accommodate the effects of additional runoff from new development (Policy CS-11.4). The Plan indicates that the City intends to develop stormwater management programs to reduce waterborne pollution discharges (Policy CS-11.5). (This policy is recommended to be consistent with requirements of the Regional Water Quality Control Board's Basin Plan, which requires preparation of an Urban Runoff Management Program.) The Plan recommends requiring new development to obtain necessary NPDES permits and implementing feasible best management practices in the design of stormwater systems (Policies CS-11.6 and CS-11.7 and City of Napa Standard Mitigation Measures). Updating the City's Drainage Master Plan would help to set City priorities regarding the most needed improvements to the existing storm drainage system (Implementation Program CS-11.A).

Standard mitigations from the City's Policy Resolution No. 27 that support/implement these water quality objectives include requirements to perform construction activities in a manner that minimizes pollutants entering the stormwater system or ground water; to obtain necessary permits from the Regional Water Quality Control Board; and to properly store construction materials that could cause water pollution.

3. *Development accommodated by the Draft General Plan would not interfere with groundwater recharge. (I)*

Adverse effects to the area's groundwater recharge capability are not expected because the majority of the land within the RUL is already urbanized and the amount of additional impervious surface from new development would be minimal. Within the RUL, there are approximately 1,037 acres of undeveloped or agricultural land slated for development. This acreage represents 1.62 square miles, or 0.0038 percent, of the 426-square-mile watershed drained by the Napa River. Accordingly, the proportion of the watershed being converted to impervious surfaces and thereby potentially affecting ground water discharge is negligible. Furthermore, Policy Resolution No. 27 requires a developer of a project which introduces new impervious surfaces that would change the rate of absorption of drainage or surface runoff to submit a drainage and grading plan.

4. *Development accommodated by the Draft General Plan would not result in the destruction of natural drainageways. (I)*

The natural drainageways in the RUL include the Napa River, Napa Creek, Browns Valley Creek, and Redwood Creek. Development under the Draft General Plan would not destroy or significantly alter these drainageways because of policies and implementation programs contained

in Chapter 7, Natural Resources, of the General Plan. These policies and programs provide recommendations to protection and enhancement the drainageways. In particular, the Plan recommends protecting riparian habitat along the Napa River and its tributaries from incompatible urban uses and activities (Policy NR-1.1). The Plan also provides for identification and protection of riparian habitats, controlled access to reduce impacts, and restorative plantings (Policies NR-1.2, NR-1.3, and NR-1.8 and Implementation Programs NR-1.A and NR-1.B). Moreover, all future waterway improvement projects within 100 feet of a waterway are subject to review to ensure that they protect and minimize effects on riparian and aquatic habitats (Policy NR-1.4 and Implementation Program NR-1.E). Finally, the Plan provides for regulation of watercraft speed to protect against bank erosion (Policy NR-1.D).

3.10 AIR QUALITY

Existing Conditions

Air quality at a given location is a function of local meteorological conditions, the amounts and types of pollutants being emitted, and the dispersion rates of pollutants within the region. The City of Napa is located within the Bay Area Air Quality Management District (BAAQMD). The BAAQMD measures ambient air quality conditions throughout the Bay Area. The Napa air quality monitoring station is located at 2552 Jefferson Street, which is centrally located within the planning area. The Napa station monitors ozone (O_3), carbon monoxide (CO), oxides of nitrogen (NO_X), and particulate matter smaller than 10 micrometers in diameter (PM_{10}). *Please refer to Tables ~~NR-1~~ NR-2 and ~~NR-2~~ NR-4 of Chapter 7, Natural Resources, of the Draft General Plan Background Report for recent data from the Napa air monitoring station and state and federal ambient air quality standards.* These data indicate that the Napa area is in conformance with all applicable standards except for PM_{10}.

The BAAQMD is in attainment for all air quality standards except for the California standard for ozone. To achieve and maintain compliance with federal and state standards, the BAAQMD, together with the Association of Bay Area Governments (ABAG) adopted an *Air Quality Management Plan* (AQMP) in 1982, the purpose of which was to identify pollutant sources, quantify present emissions, estimate future emissions, and examine pollutant control strategies for the attainment and maintenance of state and federal standards. Complementing the AQMP is the *Clean Air Plan* (CAP) which was prepared pursuant to the California Clean Air Act of 1988 and was most recently amended in 1994.

Regional meteorological conditions are dominated by the semi-permanent high pressure area in the eastern Pacific Ocean which is in large part responsible for the warm, dry summers and cool, wet winters. In the summer, this pressure center is located to the north, causing storm tracks to be directed north of California. The predominant wind direction in the area is northwesterly. In Napa, the heaviest rainfall occurs between November and April. Annual average rainfall in the City is 24.34 inches, and the mean annual temperature is 58.6 degrees Fahrenheit.

Please see the Air Quality section of Chapter 7, Natural Resources and Open Space, of the General Plan Background Report for further discussion of air quality in the City of Napa.

Impact Assessment and Mitigation

Significance Criteria

The determination of impact significance for air quality is based on criteria recently adopted by the BAAQMD. These criteria are contained in *BAAQMD CEQA Guidelines – Assessing the Air Quality Impacts of Projects and Plans* (April 1996). In Chapter 2, "Preliminary Review and Thresholds of Significance," the guidelines establish three "tests" to measure the significance of air quality impacts applicable to general plans. These tests focus on the plan's consistency with the most recently adopted regional air quality plan, the *Bay Area 1994 Clean Air Plan.* According to these tests, the updated General Plan would be consistent with the CAP if:

- the rate of increase in vehicle miles traveled (VMT) associated with the Draft General Plan is equal to or lower than the rate of increase in population for the City (based on ABAG's *Projections '94*);
- the Draft General Plan includes reasonable measures that would implement transportation control measures (TCMs) in the CAP (see Table 3.10-1); and
- the Draft General Plan establishes buffer zones around existing and proposed land uses that would emit potential odors and/or toxic air contaminants.

In essence, these tests help the BAAQMD determine whether the project would:

- conflict with adopted air quality attainment plans (CEQA Guidelines, Appendix G[a]); or
- violate ambient air quality standards, contribute substantially to an existing or proposed air quality violation, or expose sensitive receptors to substantial pollutant concentrations (CEQA Guidelines, Appendix G[x]).

Table 3.10-1
Clean Air Plan TCMs to be Implemented by Local Government

Transportation Control Measure	Description
1. Expand Employer Assistance Program	• Provide assistance to regional and local ridesharing organizations.
9. Improve Bicycle Access and Facilities	• Establish and maintain bicycle advisory committees in all nine Bay Area Counties. • Develop comprehensive bicycle plans. • Encourage employers and developers to provide bicycle access and facilities. • Improve and expand bicycle lane system.
12. Improve Arterial Traffic Management	• Continue ongoing local signal timing programs. • Study signal preemption for buses on arterials with high volume of bus traffic. • Expand signal timing programs. • Improve arterials for bus operations and to encourage bicycling.
13. Transit Use Incentives	• Expand marketing and distribution of transit passes and tickets. • Set up local transportation stores to sell passes, distribute information.
15. Local Clean Air Plans, Policies and Programs	• Incorporate air quality beneficial policies and programs into local planning and development activities, with a particular focus on subdivision, zoning and site design measures that reduce the number and length of single-occupant automobile trips.

Source: BAAQMD, 1996.

Environmental Analysis

1. *The rate of increase in VMT associated with the General Plan would not exceed ABAG's projected rate of population increase. (I)*

   ABAG prepares projections for the Bay Area's growth every other year. According to *Projections '94*, the set of projections used by the BAAQMD to prepare the CAP, the City of Napa's population would grow from 72,600 in 1995 to 84,300 in 2010, an average annual increase of 1.1 percent (*Projections '94* does not provide population estimates beyond the year 2010). According to an estimate prepared by Dowling Associates, the City's transportation consultant, the daily VMT within the City would grow by 373,200 from 1,193,900 in 1992 to 1,567,100 in 2020, an average annual increase of 1.1 percent. Thus, the projected rate of VMT increase would be equivalent to the population growth rate projected by ABAG, and on this basis, the Draft General Plan would be consistent with the CAP. Dowling Associates notes that trip data are taken from the traffic forecasting model prepared for the General Plan which included traffic passing through the City on State Highways. Since the VMT figure for the City includes this traffic, the comparative rate to City population growth would be even less than indicated.

2. *The proposed General Plan contains policies and implementation measures that would implement the transportation control measures in the Clean Air Plan. (I)*

   Table 3.10-1 identifies the various TCMs that must be evident if a community's General Plan is to be found consistent with the CAP. The following discussion shows how the Napa Draft General Plan implements each TCM.

   TCM 1: Expand Employer Assistance Program. The incentives for employer assistance programs provided by the Clean Air Act have recently been eliminated by the State. As such, the City programs are no longer funded but are promoted on a voluntary basis.

   TCM 9: Improve Bicycle Access and Facilities. Chapter 3, Transportation, of the General Plan Policy Document contains policies and implementation measures that would implement TCM 9:

   - establish five-foot bike lanes on both sides of all street at the collector level and above (Policy T-1.1);
   - develop and maintain a safe, integrated bicycle route network through residential neighborhoods and connecting to county lands (Policies T-6.1 through T-6.8, T-8.1, and T-8.2; Implementation Programs T-6.A through T-6.G, T-8.A, and T-8.B);
   - require the provision of bicycle racks and/or lockers for certain commercial and industrial projects (Policies T-7.1 and T-7.2 and Implementation Programs T-7.A and T-7.B); and
   - require coordination between the Napa Valley Unified School District and property owners to develop cost effective bicycle access to school sites where such routes are deficient (Policy T-9.8).

TCM 12: Improve Arterial Traffic Management. The Draft General Plan would implement TCM 12 through Policy NR-5.6 in Chapter 7, Natural Resources of the Draft Policy Document. This policy calls for the City to continue and expand, as appropriate, the use of synchronized traffic signals on roadways susceptible to emissions improvement through approach control. The City currently has an automated signal preemption system, and relocation of bus stops is part of the overall stop improvement program underway. The City is retrofitting old buses to meet air quality standards and is purchasing CNG-fueled replacement buses.

TCM 13: Transit Use Incentives. Chapter 3, Transportation, of the Draft General Plan Policy Document contains several policies that would create incentives to transit use, in accordance with TCM 13:

- promote coordination of Napa transit services with inter-city and regional services and consolidate transit services to improve efficiency and improve commuter linkages to transit systems in other counties (Policies T-5.4 and T-5.5);
- encourage employers to provide discount bus passes to employees to promote alternatives to single occupancy vehicles in commercial development (Policy T-5.12); and
- encourage developers to provide financial support to alternative commute modes and to provide carpool parking spaces (Policy T-5.13).

In addition, Chapter 1, Land Use, of the Draft General Plan contains a policy that would require major new development projects to be designed to support mass transit and alternative modes of transportation (Policy LU-5.3).

TCM 15: Local Clean Air Plan, Policies, and Programs. TCM 15 would be implemented by policies contained in Chapter 1, Land Use, and Chapter 7, Natural Resources, of the Draft General Plan Policy Document. Key policies that fulfill the intent of TCM 15 would:

- encourage developers of larger commercial projects to provide on-site mixed uses that would allow employees to make non-work related trips without use of their automobiles (Policy LU-5.7);
- encourage land use patterns and management practices that conserve air and energy resources, such as mixed use development and provisions for local-serving commercial uses adjacent to neighborhoods (Policy NR-5.2); and
- encourage project designs that minimize direct and indirect air emissions (Policy NR-5.5)

In summary, the Napa General Plan Policy Document contains considerable evidence to support implementation of the TCMs critical to demonstrating an insignificant air quality impact.

3. *The Draft General Plan contains measures that would buffer residential development from sources of potential odors and/or toxic air contaminants. (I)*

Chapter 1, Land Use, of the Draft General Plan, acknowledges that potential conflicts, including odors and pesticides, can occur between residential uses and agricultural land. To prevent such conflicts, the Plan would require a buffer, or agricultural setback, between residential uses on the

periphery of the RUL and productive agricultural land outside the RUL (Policy LU-3.2). In addition, the Plan promotes the use of "feathering," or allowing progressively lower density residential development within one-quarter mile of the RUL, in order to minimize potential urban/rural conflicts (Policy LU-3.3). The Plan also recognizes the potential adverse air quality effects of industrial development by requiring the City to ensure that industrial uses are designed and operated to minimize dust and air emissions, among other nuisances (Policy LU-7.4). As a result of these measures, the Draft General Plan would satisfy the third BAAQMD significance test and air quality impacts would be considered insignificant.

APPENDIX E

3.11 NOISE

Existing Conditions

Definition of Noise

Noise is generally defined as unwanted or annoying sound that is typically associated with human activity and which interferes with or disrupts normal activities. Although exposure to high noise levels has been demonstrated to cause hearing loss, the principal human response to environmental noise is annoyance. The response of individuals to similar noise events is diverse and influenced by the type of noise, the perceived importance of the noise and its appropriateness in the setting, the time of day, the type of activity during which the noise occurs, and the sensitivity of the individual hearing the sound.

Measurement and Descriptions of Noise

Airborne sound is a rapid fluctuation of air pressure above and below atmospheric pressure. Sound levels are usually measured and expressed in units of decibels (dB). Most of the sounds we hear in the environment do not consist of a single frequency, but rather a broad band of frequencies differing in sound level. The intensities of each frequency add to generate the sound we hear. The method commonly used to quantify environmental sounds consists of determining all of the frequencies of a sound according to a weighting system that reflects that human hearing is less sensitive at low and extremely high frequencies than at the midrange frequencies. This is called "A" weighting, and the decibel level measured is called the A-weighted sound level (or dBA). In practice, the level of a noise source is conveniently measured using a sound level meter that includes a filter corresponding to the dBA curve.

Another sound measure known as the Community Noise Equivalent Level (or CNEL) is defined as the "A" weighted average sound level for a 24-hour day. It is calculated by adding a 5 decibel penalty to sound levels in the evening (7:00 P.M. to 10:00 P.M.), and a 10 decibel penalty to sound levels in the night (10:00 P.M. to 7:00 A.M.) to compensate for the increased sensitivity to noise during the quieter evening and nighttime hours.

Existing Noise Sources and Levels

The major sources of noise affecting the City of Napa include traffic, the Wine Train, aircraft noise, vineyard frost fans, diesel pumps, and other machinery associated with vineyard operations. Generally, automobiles are the most dominant contributor to ambient noise levels within the City.

In order to describe the existing noise environment at the project site, noise monitoring was performed at representative locations within the City. The results of the survey are presented in Table HS-8 of Chapter 8, Health and Safety, of the Draft General Plan Background Report. To supplement the noise measurements, vehicular noise levels were estimated using the Caltrans Sound-32 Traffic Noise prediction model. Existing traffic data for major roads in the project area were used as input to the model, along with data on posted vehicle speeds and truck-to-automobile vehicle mix. The existing vehicular traffic noise levels and contour distances are presented in Table 3.11-1.

Table 3.11-1
City of Napa Existing 1992 Roadway Noise Contours

Roadway Segment	ADT	Average Vehicle Speed	SPL at 50 feet	Perpendicular Distance from Roadway Centerline to Contour in feet (hard/soft)[(†)] 75 CNEL	70 CNEL	65 CNEL	60 CNEL
State of California Highways/Freeways							
SR 29							
Southern city limits to Trower	31600	60	77.6	90/74	287/160	909/345	2877/745
Trancas to Trower	26600	60	76.8	75/65	239/142	756/305	2393/659
Trower - northern city limits	24100	55	75.4	54/53	173/114	548/246	1733/531
SR 12 w/o SR 29	20700	55	74.6	-	144/101	456/218	1442/470
SR 121							
Silverado Trail s/o First Street	8200	35	65.7	-	-	58/55	185/119
Silverado Trail - First to Lincoln	11300	35	67.3	-	-	84/71	268/153
Silverado Trail n/o Lincoln	9500	35	66.4	-	-	69/61	218/133
SR 221 s/o Imola	25700	50	74.7	-	147/102	466/221	1475/477
Major Arterials							
Jefferson Street - Fifth to Trower Ave.	18500	35	69.7	-	-	147/102	466/221
Soscol Ave. - Silverado Trail to Trancas St.	22300	35	70.6	-	57/54	181/118	574/254
Redwood Road - Dry Creek Rd. to SR 29	14000	35	68.3	-	-	106/82	338/178
Trancas St. - SR 29 to eastern city limits	21800	35	70.5	-	56/53	177/116	561/250
Lincoln Ave. - SR 29 to Silverado Trail	7800	35	65.5	-	-	56/53	177/116
First Street - Browns Valley Rd. to California Blvd.	17500	35	69.4	-	-	137/98	435/211
Imola Ave. - SR 29 to Soscol Ave.	20000	35	70.1	-	51/50	161/109	511/235
Minor Arterials							
Dry Creek Rd. - Redwood Rd. to Trower Ave.	3900	30	61.8	-	-	-	75/65
Jefferson St. - Trower Ave. to Salvador Ave.	2900	30	60.5	-	-	-	56/53
Jefferson St. - Fifth St. to southern terminus	17000	30	68.6	-	-	114/86	362/187
Big Ranch Road - Trancas St. to northern city limits	6300	30	63.9	-	-	-	122/90
Browns Valley Rd. - Redwood Rd. to First St.	15600	30	68.2	-	-	104/81	330/176
Main Street - Fifth Street to Pearl St.	7200	30	64.5	-	-	-	140/99
Salvador Ave. - Linda Vista Ave. to Big Ranch Rd.	2900	30	60.5	-	-	-	56/53
Trower Ave. - Dry Creek Rd. to Sierra Ave.	5400	30	63.2	-	-	-	104/81
Redwood Rd. - western city limits to Dry Creek Rd.	5900	30	63.6	-	-	-	114/86
First Street - Silverado Trail to California Blvd.	17500	30	68.8	-	-	119/89	379/193
Second St. - California Blvd. to Main St.	13900	30	67.6	-	-	90/74	287/160
Third St. - Silverado Trail to California Blvd.	9900	30	66.0	-	-	62/58	199/125
Coombsville Rd. - Silverado Trail to eastern city limits	6300	30	63.9	-	-	-	122/90
Fourth St. - Third Street to Coombs St.	4300	30	62.2	-	-	-	82/70

Table 3.11-1 (cont.)
City of Napa Existing 1992 Roadway Noise Contours

Roadway Segment	ADT	Average Vehicle Speed	SPL at 50 feet	Perpendicular Distance from Roadway Centerline to Contour in feet (hard/soft)[†]			
				75 CNEL	70 CNEL	65 CNEL	60 CNEL
Minor Arterials (continued)							
Old Sonoma Rd. - western city limits to Jefferson St.	5600	30	63.4	-	-	-	109/84
Imola Ave. - Foster Rd. to SR 29	7600	30	64.8	-	-	-	150/104
Imola Ave. - SR 221 to eastern city limits	5000	30	62.9	-	-	-	97/78
Collectors							
Austin Way / Pinewood Drive	1500	25	56.5	-	-	-	-
Beard Rd.	*	*					
Brown St. - Vallejo St. to Coombs St.	*	*					
Browns Valley Rd. - Buhman Ave. to Redwood Rd.	2100	25	57.8	-	-	-	-
Buhman Ave.	4600	25	61.1	-	-	-	64/59
Byway East	300	25	51.4	-	-	-	-
California Blvd. / Ornduff St.	10000	25	64.7	-	-	-	147/102
Calistoga St.	5300	25	61.8	-	-	-	75/65
Clark St.	2500	25	58.5	-	-	-	-
Coombs St. - Brown St. to Imola Ave.	7800	25	63.5	-	-	-	111/85
Dry Creek Rd. - RUL Line to Trower Ave.	1000	25	55.0	-	-	-	-
East Ave.	2500	25	58.5	-	-	-	-
El Centro Ave.	1800	25	57.2	-	-	-	-
Fifth St. - Coombs St. to Main St.	*	*					
Foothill Blvd.	1000	25	55.0	-	-	-	-
Foster Rd.	1900	25	57.4	-	-	-	-
Franklin St.	*	*					
Golden Gate Dr.	300	25	51.4	-	-	-	-
Kansas Ave.	3600	25	60.1	-	-	-	51/50
Laurel St.	1200	25	55.6	-	-	-	-
Linda Vista Ave.	4800	25	61.3	-	-	-	67/61
Main St. - Pueblo Ave. to Pearl St.	5300	25	61.8	-	-	-	75/65
Montecito Blvd.	*	*					
Orchard Ave.	1600	25	56.7	-	-	-	-
Partrick Rd.	*	*					
Pearl St.	5300	25	61.8	-	-	-	75/65
Pueblo Ave.	7800	25	63.5	-	-	-	111/85
Randolph St. - Pearl St. to Fourth St.	*	*					
Robinson Ln.	500	25	52.7	-	-	-	-
Seminary St. - Calistoga St. to Third St.	*	*					
Sierra Ave.	6000	25	62.3	-	-	-	84/71
Shetler Ave.	*	*					
Shurtleff Ave.	1700	25	57.0	-	-	-	-
Solano Ave.	3200	25	59.6	-	-	-	-
Sousa Ln.	1200	25	55.6	-	-	-	-
Spruce St.	*	*					
Stanley Ln.	*	*					

Table 3.11-1 (cont.)
City of Napa Existing 1992 Roadway Noise Contours

Roadway Segment	ADT	Average Vehicle Speed	SPL at 50 feet	Perpendicular Distance from Roadway Centerline to Contour in feet (hard/soft)(†) 75 CNEL	70 CNEL	65 CNEL	60 CNEL
Collectors (continued)							
Terrace Dr.	400	25	52.1	-	-	-	-
Terra Verde Dr.	*	*					
Thompson Ave.	1300	25	55.9	-	-	-	-
Vallejo St.	*	*					
Walnut St.	*	*					
West Pueblo Ave.	2700	25	58.8	-	-	-	-
West Salvador Dr. (now Wine Country Dr.)	1500	25	56.5	-	-	-	-
Westview Dr.	3200	25	59.6	-	-	-	-
Yajome St.	*	*					

All Sound Pressure Levels (SPLs) given in A-weighted decibels or dBA. Contour lines given to nearest foot.
Calculated using an assumed vehicle mix of 96% Cars, 2% Med. Trucks, 2% Heavy Trucks. Free flow vehicle speeds utilized.

(†): Assumed to be line-of-sight distance. Upper values indicate hard-site propagation distance, lower values indicate soft-site propagation distance.
(*): Traffic data not available.
(-): Noise contour is coincident with traffic right-of-way taken as 50 feet from centerline.
Traffic Data Source: Dowling Associates. Inc., 1996.

Further discussion of noise measurements and sources in the City of Napa can be found in the noise section of Chapter 8, Health and Safety, of the Draft General Plan Background Report.

Impact Assessment and Mitigation

Significance Criteria

Significant noise impacts would occur if the proposed project substantially increases the ambient noise levels for adjoining areas, pursuant to CEQA Guidelines, Appendix G (p). More specifically, significant noise impacts may be expected whenever the sound level exceeds the compatibility criteria identified in Figure 3.11-1 (Table 8-1 of the Draft General Plan). This criterion is applied in the context of long-term, city-wide impacts in accordance with standards from the CEQA Guidelines for general plan EIRs.

Environmental Analysis

1. *There would not be any new residential areas exposed to noise levels greater than 70 dBA CNEL from vehicular traffic. (I)*

Table 3.11-1 (cont.)
City of Napa Existing 1992 Roadway Noise Contours

Roadway Segment	ADT	Average Vehicle Speed	SPL at 50 feet	Perpendicular Distance from Roadway Centerline to Contour in feet (hard/soft)(†)			
				75 CNEL	70 CNEL	65 CNEL	60 CNEL
Collectors (continued)							
Terrace Dr.	400	25	52.1	-	-	-	-
Terra Verde Dr.	*	*					
Thompson Ave.	1300	25	55.9	-	-	-	-
Vallejo St.	*	*					
Walnut St.	*	*					
West Pueblo Ave.	2700	25	58.8	-	-	-	-
West Salvador Dr. (now Wine Country Dr.)	1500	25	56.5	-	-	-	-
Westview Dr.	3200	25	59.6	-	-	-	-
Yajome St.	*	*					

All Sound Pressure Levels (SPLs) given in A-weighted decibels or dBA. Contour lines given to nearest foot.
Calculated using an assumed vehicle mix of 96% Cars, 2% Med. Trucks, 2% Heavy Trucks. Free flow vehicle speeds utilized.

(†): Assumed to be line-of-sight distance. Upper values indicate hard-site propagation distance, lower values indicate soft-site propagation distance.
(*): Traffic data not available.
(-): Noise contour is coincident with traffic right-of-way taken as 50 feet from centerline.
Traffic Data Source: Dowling Associates. Inc., 1996.

Further discussion of noise measurements and sources in the City of Napa can be found in the noise section of Chapter 8, Health and Safety, of the Draft General Plan Background Report.

Impact Assessment and Mitigation

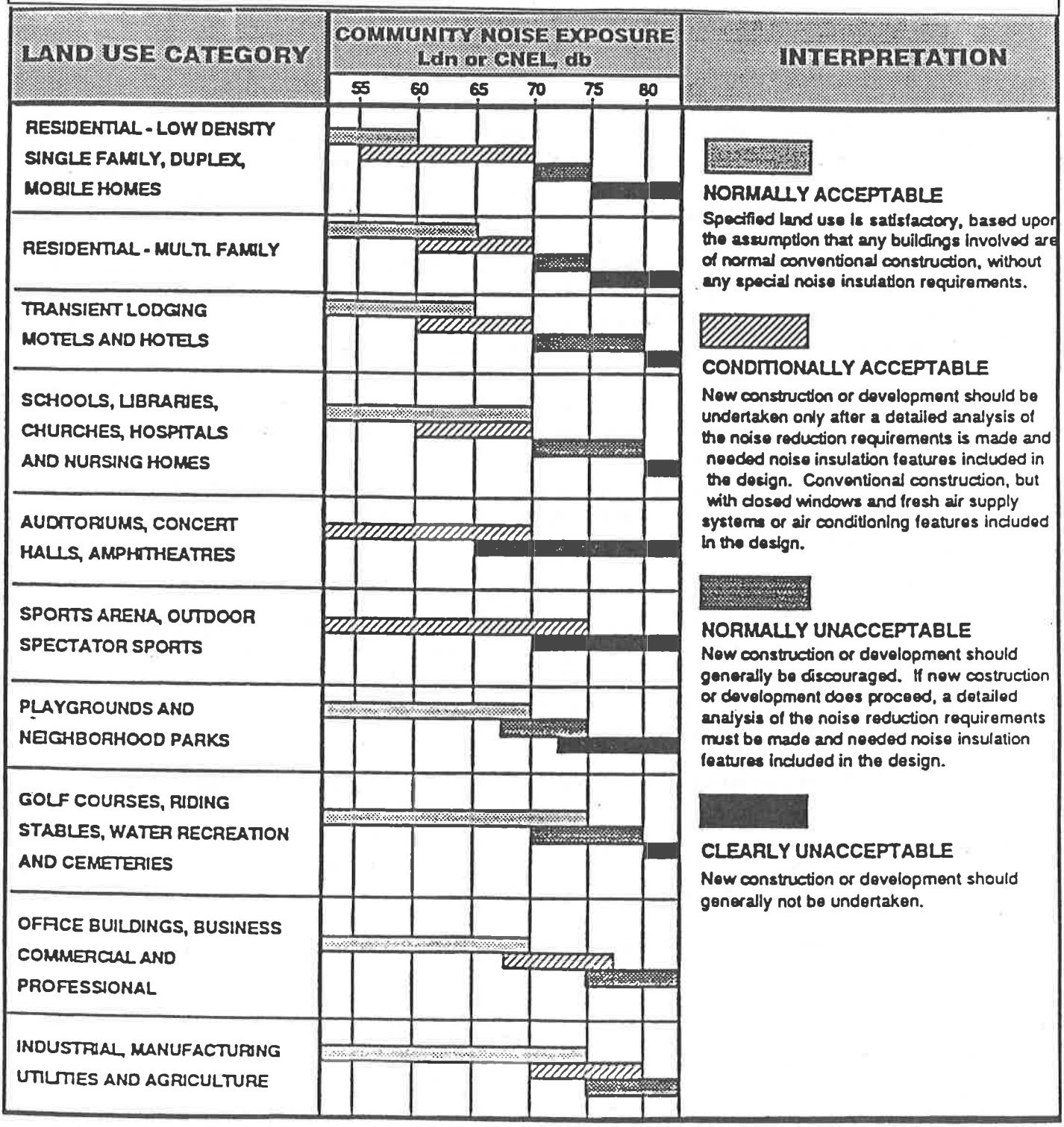
Significance Criteria

Significant noise impacts would occur if the proposed project substantially increases the ambient noise levels for adjoining areas, pursuant to CEQA Guidelines, Appendix G (p). More specifically, significant noise impacts may be expected whenever the sound level exceeds the compatibility criteria identified in Figure 3.11-1 (Table 8-1 of the Draft General Plan). This criterion is applied in the context of long-term, city-wide impacts in accordance with standards from the CEQA Guidelines for general plan EIRs.

Environmental Analysis

1. *There would not be any new residential areas exposed to noise levels greater than 70 dBA CNEL from vehicular traffic. (I)*

Figure 3.11-1
LAND USE COMPATIBILITY FOR COMMUNITY NOISE ENVIRONMENTS



An analysis of projected vehicular traffic can be used to determine whether future ambient noise levels would increase under the Draft General Plan. Generally, a tripling of average daily traffic volumes (ADT) would result in an ambient noise level increase of 4.5 to 5 dB. While the resulting overall noise level may be acceptable for certain land uses, according to the land use compatibility criteria, such an increase would be perceptible to the human ear and would generally be perceived as a significant increase by existing noise-sensitive land uses, or "sensitive receptors," such as residents, skilled care or intermediate care nursing facilities, and schools. Based on traffic data prepared by Dowling Associates, Table 3.11-2 summarizes the estimated distance in feet to various noise contours associated with vehicular traffic. Based on these estimates, the 70 CNEL, which is the critical threshold for residential development, would not be experienced by any sensitive receptors that are not already exposed to this level. Accordingly, there would be no exceedances of the land use/noise compatibility guidelines presented in Figure 3.11-1.

In those areas where noise levels may be normally or conditionally unacceptable, the noise section of Chapter 8, Health and Safety, of the Draft General Plan Policy Document establishes policies that would minimize noise impacts on both existing and new land uses. To minimize noise impacts for existing sensitive land uses, the City would use traffic management techniques to reduce the level of noise in residential neighborhoods to "normally acceptable," as shown in the land use compatibility guidelines in Table 8-1 of the Draft Policy Document (Policy HS-9.3), evaluate and modify as necessary the City's designated truck routes (Policy HS-9.12), and continue to enforce State muffler and exhaust laws (Policy HS-9.5). New development would be required to meet acceptable exterior noise level standards as established in the noise and land use compatibility guidelines (Policy HS-9.1) and an interior CNEL of 45 dB or less (Policy HS-9.13). In addition, the City would use CEQA as an enforcement mechanism (Policy HS-9.2).

The City would also encourage alternatives to the use of sound walls to attenuate noise impacts, such as careful site planning and building design, including clustering of residential development (Policies HS-9.7 and HS-9.14). Proper site planning to reduce noise impacts can include orienting buildings on a site in such a way as to exploit the site's noise-attenuating features. By consideration of a site's natural topography, size, and shape, it is often possible to reduce and possibly eliminate noise impacts from vehicular traffic. Site planning techniques include:

- increasing the distance from the noise source to sensitive receptors by creation of setbacks, or buffers;
- placing non-noise sensitive uses such as parking lots and utility areas between the noise source and receiver; and
- orienting usable outdoor living space such as balconies, patios, and children play areas away from roadways.

Table 3.11-2
City of Napa Projected 2020 Roadway Noise Contours

Roadway Segment	ADT	Average Vehicle Speed	SPL at 50 feet	Perpendicular Distance from Roadway Centerline to Contour in feet (hard/soft)(†)			
				75 CNEL	70 CNEL	65 CNEL	60 CNEL
State of California Highways/Freeways							
SR 29							
Southern city limits to Trower	46500	60	79.6	144/101	456/218	1442/470	4560/1013
Trancas to Trower	49200	60	79.9	154/106	488/228	1545/492	4886/1060
Trower - northern city limits	38000	55	77.7	93/75	294/163	931/351	2944/756
SR 12 w/o SR 29	24000	55	75.4	54/53	173/114	548/246	1733/531
SR 121							
Silverado Trail s/o First Street	12800	35	67.9	-	-	97/78	308/168
Silverado Trail - First to Lincoln	16700	35	69.2	-	-	131/95	415/205
Silverado Trail n/o Lincoln	14200	35	68.4	-	-	109/84	345/181
SR 221 s/o Imola	35900	50	76.4	69/61	218/133	690/287	2182/619
Major Arterials							
Jefferson Street - Fifth to Trower Ave.	17100	35	69.3	-	-	134/96	425/208
Soscol Ave. - Silverado Trail to Trancas St.	32000	35	72.5	-	88/73	281/158	889/340
Redwood Road - Dry Creek Rd. to SR 29	10800	35	67.1	-	-	81/69	256/148
Trancas St. - SR 29 to eastern city limits	27800	35	71.8	-	75/65	239/142	756/305
Lincoln Ave. - SR 29 to Silverado Trail	7500	35	65.3	-	-	53/52	169/112
First Street - Browns Valley Rd. to California Blvd.	21000	35	70.3	-	53/52	169/112	535/243
Imola Ave. - SR 29 to Soscol Ave.	26500	35	71.5	-	70/62	223/135	706/292
Minor Arterials							
Dry Creek Rd. - Redwood Rd. to Trower Ave.	5500	30	63.3	-	-	-	106/82
Jefferson St. - Trower Ave. to Salvador Ave.	4700	30	62.6	-	-	-	90/74
Jefferson St. - Fifth St. to southern terminus	19100	30	69.2	-	-	131/95	415/205
Big Ranch Road - Trancas St. to northern city limits	6800	30	64.2	-	-	-	131/95
Browns Valley Rd. - Redwood Rd. to First St.	10200	30	66.1	-	-	64/59	203/127
Main Street - Fifth Street to Pearl St.	6700	30	64.2	-	-	-	131/95
Salvador Ave. - Linda Vista Ave. to Big Ranch Rd.	2800	30	60.3	-	-	-	53/52
Trower Ave. - Dry Creek Rd. to Sierra Ave.	6900	30	64.3	-	-	-	134/96
Redwood Rd. - western city limits to Dry Creek Rd.	6100	30	63.8	-	-	-	119/89
First Street - Silverado Trail to California Blvd.	14800	30	68.0	-	-	99/79	315/170
Second St. - California Blvd. to Main St.	11000	30	66.5	-	-	70/62	223/135
Third St. - Silverado Trail to California Blvd.	12500	30	67.1	-	-	81/69	256/148
Coombsville Rd. - Silverado Trail to eastern city limits	7100	30	64.4	-	-	-	137/98
Fourth St. - Third Street to Coombs St.	1200	30	57.0	-	-	-	-

Table 3.11-2 (cont.)
City of Napa Projected 2020 Roadway Noise Contours

Roadway Segment	ADT	Average Vehicle Speed	SPL at 50 feet	Perpendicular Distance from Roadway Centerline to Contour in feet (hard/soft)[†]			
				75 CNEL	70 CNEL	65 CNEL	60 CNEL
Minor Arterials (continued)							
Old Sonoma Rd. - western city limits to Jefferson St.	5700	30	63.4	-	-	-	109/84
Imola Ave. - Foster Rd. to SR 29	11800	30	66.8	-	-	75/65	239/142
Imola Ave. - SR 221 to eastern city limits	6500	30	64.0	-	-	-	125/92
Collectors							
Austin Way / Pinewood Drive	900	25	54.6	-	-	-	-
Beard Rd.	*	*					
Brown St. - Vallejo St. to Coombs St.	*	*					
Browns Valley Rd. - Buhman Ave. to Redwood Rd.	2600	25	58.7	-	-	-	-
Buhman Ave.	5200	25	61.7	-	-	-	73/64
Byway East	300	25	51.4	-	-	-	-
California Blvd. / Ornduff St.	6800	25	62.9	-	-	-	97/78
Calistoga St.	5600	25	62.0	-	-	-	79/67
Clark St.	2400	25	58.3	-	-	-	-
Coombs St. - Brown St. to Imola Ave.	9300	25	64.4	-	-	-	137/98
East Ave.	2100	25	57.8	-	-	-	-
Dry Creek Rd. - RUL Line to Trower Ave.	1800	25	57.2	-	-	-	-
El Centro Ave.	1700	25	57.0	-	-	-	-
Fifth St. - Coombs St. to Main St.	*	*					
Foothill Blvd.	1100	25	55.3	-	-	-	-
Foster Rd.	2200	25	58.0	-	-	-	-
Franklin St.	*	*					
Golden Gate Dr.	300	25	51.4	-	-	-	-
Kansas Ave.	5400	25	61.8	-	-	-	75/65
Laurel St.	1500	25	56.5	-	-	-	-
Linda Vista Ave.	2700	25	58.8	-	-	-	-
Main St. - Pueblo Ave. to Pearl St.	4600	25	61.1	-	-	-	64/59
Montecito Blvd.	*	*					
Orchard Ave.	2300	25	58.2	-	-	-	-
Partrick Rd.	*	*					
Pearl St.	5600	25	62.0	-	-	-	79/67
Pueblo Ave.	7500	25	63.4	-	-	-	109/84
Randolph St. - Pearl St. to Fourth St.	*	*					
Robinson Ln.	5000	25	61.5	-	-	-	70/62
Seminary St. - Calistoga St. to Third St.	*	*					
Sierra Ave.	3800	25	60.3	-	-	-	53/52
Shetler Ave.	*	*					
Shurtleff Ave.	1600	25	56.7	-	-	-	-
Solano Ave.	3700	25	60.2	-	-	-	52/51
Sousa Ln.	1700	25	57.0	-	-	-	-
Spruce St.	*	*					
Stanley Ln.	*	*					

Table 3.11-2 (cont.)
City of Napa Projected 2020 Roadway Noise Contours

Roadway Segment	ADT	Average Vehicle Speed	SPL at 50 feet	Perpendicular Distance from Roadway Centerline to Contour in feet (hard/soft)(†)			
				75 CNEL	70 CNEL	65 CNEL	60 CNEL
Collectors (continued)							
Terrace Dr.	400	25	52.1	-	-	-	-
Terra Verde Dr.	*	*					
Thompson Ave.	1700	25	57.0	-	-	-	-
Vallejo St.	*	*					
Walnut St.	*	*					
West Pueblo Ave.	4000	25	60.5	-	-	-	56/53
West Salvador Dr. (now Wine Country Dr.)	2200	25	58.0	-	-	-	-
Westview Dr.	3200	25	59.6	-	-	-	-
Yajome St.	*	*					

All Sound Pressure Levels (SPL's) given in A-weighted decibels or dBA. Contour lines given to nearest foot.
Calculated using an assumed vehicle mix of 96% Cars, 2% Med. Trucks, 2% Heavy Trucks. Free flow vehicle speeds utilized.

(†): Assumed to be line-of-sight distance. Upper values indicate hard-site propagation distance, lower values indicate soft-site propagation distance.
(*): Traffic data not available.
(-): Noise contour is coincident with traffic right-of-way taken as 50 feet from centerline.
Traffic Data Source: Dowling Associates. Inc., 1996.

3.12 PUBLIC HEALTH AND SAFETY

For the purposes of this report, discussion of environmental hazards to public health is limited to hazardous materials. Other potential health and safety impacts are addressed elsewhere in this chapter: emergency response by police and fire staffs are addressed in Section 3.4, Community Services and Utilities; impacts associated with geology and seismicity are described in Section 3.8, Geology, Soils, and Seismicity; impacts related to water quality are described in Section 3.9, Hydrology; and impacts related to air quality are presented in Section 3.10, Air Quality.

Existing Conditions

Hazardous Materials Definition

As defined in Chapter 6.95 of Division 20 of the California Health and Safety Code, Section 25501(k), a hazardous material is:

> ...any material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. "Hazardous materials" include, but are not limited to, hazardous substances, hazardous waste, and any material which a handler or the administering agency has a reasonable basis for believing that it would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment.

Hazardous Materials Storage, Usage, and Disposal in the City of Napa

Storage and disposal of hazardous materials within the City of Napa is under the jurisdiction of the Napa County Department of Environmental Management. Specific responsibilities include administration of an underground storage tank program, and oversight, review, and monitoring of individual business plans or hazardous materials management plans (HMMPs) required for all facilities storing hazardous materials above threshold quantities within the County. Approximately 1,000 companies throughout Napa have HMMPs on file with the County. A county-wide HMMP is currently in a draft stage. As such, there is no centralized inventory of all hazardous materials stored within the County.

The Department of Environmental Management is reviewing the individual HMMPs in order to generate a ranking system of facilities based on potential hazards. ~~A preliminary ranking indicates that the Imola Plant and the Soscol wastewater treatment plants are the two highest ranking facilities within the City and County of Napa.~~ Once the rankings have been finalized, the most hazardous facilities will be required to submit Risk Management Prevention Plans (RMPPs) to assess the risks associated with chemical release from these facilities and to develop mitigation plans to minimize these risks to the community.

There are no authorized off-site treatment or disposal sites for hazardous wastes within the City or County of Napa.

The County Department of Environmental Management maintains a listing of approximately 200 to 250 leaking and/or contaminated underground storage tanks (USTs) located at approximately 100 sites

throughout the County. Contamination at these sites is limited primarily (if not entirely) to hydrocarbon products released from fuel storage tanks. Tanks remain in the ground at only 10 to 15 of these sites as the majority of the contaminated UST sites were identified during actual tank removal procedures.

Bulk chemical storage in the City of Napa is primarily limited to small quantity storage of hazardous materials in individual commercial businesses, petroleum storage in underground storage tanks, and utility storage of water treatment chemicals. Some former tannery sites contain soils contaminated with heavy metals from previous discharges of solvents.

Petroleum products are stored in underground storage tanks at gasoline stations and plants throughout the City, including the City corporation yard (five tanks with approximately 45,000 gallons total storage capacity) and the Napa Valley Petroleum gasoline plant (with approximately 58,000 gallons total storage capacity). In general, gasoline plants and stations are concentrated along the Napa River below Eighth Street, Oil Company Road, Lincoln and Soscol, and Jefferson Street.

Hazardous materials transport within the City of Napa consists of truck transport of gasoline, liquid petroleum, and fertilizers. This transport is conducted primarily along State Routes 12, 29, 121, 128, and 221. Concerns due to hazardous materials transport includes the potential for spills, collisions, or combustion of these products which could result in toxic emissions, traffic disruption, pollution, or fires within the City.

The City adopted a Source Reduction and Recycling Element (SRRE) on October 1, 1991 which contains a separate Household Hazardous Waste Element (HHWE). The HHWE establishes short- and medium-term goals to reduce the amount of household hazardous wastes stored within the home for future disposal. Napa County has prepared a Preliminary Draft Integrated Waste Management Plan (December 1, 1995) that incorporates the City's SRRE and HHWE. Also, the County has submitted an application (December 29, 1995) to be approved as the Certified Unified Program Agency for all of the County's jurisdictions. Currently, the County Department of Environmental Management coordinates with the County Agricultural Commissioner Office to implement the following hazardous materials programs:

- Hazardous Waste Generator Program;
- Above Ground Tank Spill Prevention Control and Countermeasure Program;
- Hazardous Materials Business Plans;
- Risk Management and Prevention Plan; and
- Underground Storage Tank Program.

For further discussion of the storage, usage, and disposal of hazardous materials within the RUL, please refer to the Hazardous Materials section of Chapter 8, Health and Safety, of the Draft General Plan Background Report.

Impact Assessment and Mitigation

Significance Criteria

CEQA Guidelines, Appendix G (v), state that a significant impact would occur if a project creates a potential public hazard or involves the use, production or disposal of materials that could pose a hazard to human, animal, or plant populations.

Environmental Analysis

1. *Hazardous materials and waste associated with development accommodated by the Draft General Plan would not pose a significant hazard to people or animal and plant populations within the RUL or adjacent areas. The Draft General Plan contains policies and implementation programs that would reduce potential hazardous waste and materials impacts to an insignificant level. (I)*

   The Draft General Plan would permit commercial and industrial uses with hazardous materials storage, usage, and disposal similar to existing uses, which are currently regulated by the County Department of Environmental Management. Chapter 8, Health and Safety, of the Draft General Plan Policy Document contains policies that would support the County's efforts to reduce the risks to health and safety from hazardous materials. These policies focus on supporting the County's proposed Integrated Waste Management Plan and the County's role as the Certified Unified Program Agency for all of the County's jurisdictions (Policies HS-7.2 and HS-7.3). In addition, the City will reevaluate, modify, and implement changes to the short-term goals of the Household Hazardous Waste Element, as necessary (Policy HS-7.1). The Health and Safety chapter of the Policy Document also contains policies addressing emergency preparedness and response that would maintain and improve effective hazardous materials incident response (Policies HS-8.1 through HS-8.18). The actions required by these policies include maintenance of emergency response plans, identification of evacuation routes, and city-wide rehearsal of the procedures established by the Disaster Management Plan.

   Chapter 1, Land Use, of the Draft General Plan Policy Document would also minimize potential hazardous materials effects by requiring the City to ensure that industrial development is designed and operated to minimize hazardous materials generation (Policy LU-7.4).

APPENDIX E

Chapter 4
Other CEQA Issues

4.1 Introduction

This section provides a summary of impacts that cannot be mitigated to a less than significant level, aspects of the proposed project that could stimulate population or employment growth, and a discussion of the cumulative impacts associated with the proposed project.

4.2 Unavoidable Adverse Impacts

~~There are no unavoidable adverse effects associated with the adoption and implementation of the Draft Napa General Plan. In fact, no effects were found to be significant, because policies and programs included as part of the project would serve to mitigate potential environmental impacts.~~

The environmental analysis in Chapter 3 concludes that impacts of adoption and implementation of the new General Plan will be significant or potentially significant in ~~three~~ four areas:

1. Prime agricultural soils within the City's RUL would be converted to urban uses. (Significant)
2. The SR 221 - SR 29 intersection would continue to operate at Level of Service F, largely due to cross-county traffic between Solano and Sonoma Counties. (Significant) In addition, uncertainty of funding for transportation improvements and city trips that impact roadways outside the city limits may create potentially significant impacts. (Potentially Significant)
3. Water demand could exceed the City of Napa's water supply during drought years. (Potentially Significant)
4. There may be impacts to endangered species and habitat caused by future development enabled by the General Plan. (Significant) *(Text Revision for 12/98 FEIR – Double Underline / Strikethrough)*

Conversion of prime agricultural soils within the RUL to urban uses is an unavoidable impact if these lands are designated for urban development. The only mitigation for this impact is to exclude the lands with prime agricultural soils from the RUL or to designate the lands for agricultural or open space use.

The continuing congestion at the SR 221 - SR 29 intersection is unavoidable from the City's perspective since the condition is largely due to cross-county traffic between Solano and Sonoma Counties, which is beyond the control of the City of Napa.

4.3 Growth-Inducing Impacts

As required by Section 15126 (g) of the CEQA Guidelines, the growth-inducing effects of a project must be discussed. A project is considered growth-inducing if it could directly or indirectly foster economic or population growth. For example, extension of urban services or transportation facilities into previously unserved or underserved areas, or removal of obstacles to growth and development, would be considered factors that contribute to growth inducement. Growth could occur in the form of land development or increased numbers and concentrations of housing and jobs.

The Draft General Plan incorporates a growth management strategy emphasizing a *confined city policy* implemented through continued reliance on the Rural Urban Limit (RUL) and a *development pacing or staging system* that ensures that the rate of growth would not exhaust the City's remaining residential land supply before the end of the planning period (i.e., 2020). This growth management policy meters the City's growth potential. The Draft General Plan's proposed land uses would accommodate a household population and work force generally consistent with ABAG regional growth projections. In addition, the proposed land uses would not require extension of public services or utilities to previously large, unserved areas. Therefore, no "surplus" capacity would be created that could induce additional growth.

4.4 CUMULATIVE IMPACTS

Cumulative impacts are those resulting from the proposed project in combination with other closely related, foreseeable projects. The analysis is important to provide decision-makers with a broader context in which to understand potential effects of a project. An individual project may by itself generate insignificant effects; however, in combination with other related projects, these insignificant effects may be significant. The CEQA Guidelines allow the cumulative analysis to be performed based on a list of related projects or a summary of projections in the general plan or related planning document (CEQA Guidelines, Section 15130 [b]).

Since the proposed project is a long-range planning document, it is reasonable that the cumulative analysis reflects ABAG's *Projections '96*. To confirm the appropriateness of this choice, Napa County staff was contacted to determine if other known or foreseeable projects should be recognized that may not be included in ABAG's forecasts. Consultation with the Napa County Conservation, Development, and Planning Department revealed that the only foreseeable project with which the proposed project may cumulate is the Draft Airport Industrial Area Specific Plan (1996). This plan, however, has already been included in the ABAG assessment of Napa County's population, housing, and employment figures. ABAG's projections for the City and County are presented in Table 4-1.

As defined above, cumulative effects consider the impacts from adoption of the Napa General Plan plus those from other development in the County. Whenever a significant cumulative effect is identified, mitigation will be required of all jurisdictions contributing to future development. Clearly, no one jurisdiction alone can mitigate significant cumulative impacts to an insignificant level. For example, cities can only exercise jurisdiction and adopt corrective measures within their city limits. It will therefore be incumbent upon each jurisdiction to mitigate for its share of, or contribution to, the cumulative impact.

Land Use. The Napa Valley is world renown for its scenic vineyards and open space resources. In recognition of the scenic, economic, and open space benefits provided by these resources, the County and each of the cities have embraced the concepts of urban-centered growth surrounded by a greenbelt. These concepts call for urban development to occur within the cities, communities to be separated by open space, and definitive boundaries to delineate urban areas from rural/agricultural areas. The Draft General Plan upholds these concepts by retaining the RUL. The proposed RUL expansion areas would not alter the overall land use pattern in the Napa Valley. ~~nor would they cause the conversion of agriculturally productive lands to urban uses.~~ Because the County and each of the jurisdictions work cooperatively to preserve the greenbelt and because the County has adopted growth control measures

(Measure J), the ABAG growth forecasts would be accommodated primarily in the cities. Table 4-1 shows that of the 15,500 dwelling units projected for Napa County as a whole between 1990 and 2015, over 80 percent would be located within city spheres of influence. Consequently, the overall land use configuration within the County would be expected to remain unchanged, and the cumulative growth would not significantly affect this development pattern.

As the incorporated communities build out, there would likely be increased land use compatibility impacts at the urban/agricultural interface. These land use conflicts would arise as urban uses, unaccustomed to agricultural operations such as spraying, noise, dust, odors, and heavy truck traffic, develop adjacent or close to cultivated areas. This cumulative significant effect can be mitigated through agricultural buffers, deed notices, and reduced densities near the cities' urban expansion limits. The City of Napa includes such measures in its General Plan and is therefore mitigating its contribution to cumulative effects.

Transportation. The traffic analysis performed for the Draft General Plan and this EIR was based on ABAG forecasts for both the City and the County. Thus, the Average Daily Traffic (ADT) volumes and intersection levels of service projected for the City planning area already reflect the cumulative contributions from county-wide growth. As noted in Section 3.3, Transportation, ~~ten~~ nine new intersections would deteriorate from acceptable service levels to unacceptable service levels, if no traffic improvements were implemented. With the proposed improvements, ~~there would be no unavoidable significant effects.~~ all but one would operate within or close to the established criteria. The exception is the SR 221 - SR 29 intersection, which is currently operating at LOS F. Much of the increased traffic would be generated not by City growth but by cross-county traffic traveling between Solano and Sonoma Counties.

Table 4-1
Cumulative Growth Forecasts

	1990	2000	2010	2015/2020**
City of Napa (Draft General Plan)*				
Total Population	67,026	72,250	76,670	81,140
Dwelling Units	26,305	28,400	30,300	32,000
Jobs	28,640	33,620	38,190	42,720
City of Napa (ABAG)*				
Total Population	73,000	79,500	85,400	88,700
Dwelling Units	25,491	29,140	32,030	33,520
Jobs	26,450	29,690	36,570	38,970
Other Cities*				
Total Population	20,496	26,000	28,800	34,700
Dwelling Units	7,740	9,350	11,690	12,930
Jobs	10,370	12,410	17,100	17,180
Unincorporated County				
Total Population	22,708	27,200	27,400	29,100
Dwelling Units	8,081	9,270	9,890	10,400
Jobs	10,890	14,770	20,290	23,800
Napa County (Whole County)				
Total Population	110,765	132,700	144,700	152,500
Dwelling Units	41,312	47,760	53,610	56,850
Jobs	47,710	56,870	73,960	79,950

Sources: Napa Draft General Plan, Policy Document, August 1996; ABAG Projections '96.

* Figures are for city spheres of influence.
** Figures for City of Napa are for 2020; all other figures in this column are for 2015.

The analysis in Section 3.3 also considered the proposed project's effects on the Congestion Management Plan (CMP), a county-wide program to attain acceptable service levels by the year 2000 on critical travel corridors, primarily state highways. The Draft General Plan was found to be consistent with the assumptions used in the CMP and therefore cumulative traffic congestion impacts would not be significant.

Community Services and Utilities. For community services and utilities, the relevant cumulative study area is the service provider's service area. For most of the service providers, this area is coterminous with the city limits; it is the City Police Department that responds to calls for law enforcement, it is the City Fire Department that responds to firefighting calls, it is the City that contracts for the collection and disposal of solid waste. Because the impact assessment of the Draft General Plan examines growth within the entire planning area (within the RUL), the analysis performed in Section 3.4 of this document does consider the cumulative effects of development. Policies and programs recommended in the Draft General Plan would maintain current service levels and avoid significant effects such as prolonged response times.

For wastewater collection and treatment and for water supply, the applicable cumulative study area extends beyond the city limits. For wastewater, the Napa Sanitation District service area encompasses the City's RUL, plus the Silverado Country Club area, the Napa State Hospital, and industrial parks around the County Airport. With respect to water supply, the City provides water to the majority of users in lower Napa Valley, including Congress Valley, the Silverado Country Club area, and the customers along Monticello Road and the Conn Transmission Main. Development in these other communities could cumulate with demand from the City to overtax the capacity of the wastewater and water supply systems.

The demand analysis presented in Section 3.4 of this Draft EIR indicates that wastewater capacity may be exhausted before buildout of Draft General Plan (2020), ~~by the year 2012,~~ even with the implementation of the improvements recommended in the wastewater master plan. Thus, there would be significant cumulative impacts for wastewater treatment within the planning horizon of the Draft General Plan. Given the relatively long lead time to devise alternative solutions to wastewater treatment, it is expected that the Napa Sanitation District could implement treatment plant improvements or reclamation schemes by the time wastewater capacity becomes a serious constraint. Such improvements could include plant expansion, increased storage facilities, and expansion of land application on grazing and pasture lands and on golf courses and landscaped areas.

Water supply would be sufficient during normal years to serve development of the City according to the Draft General Plan. Table CS-8 of the Draft General Plan Background Report shows that water demand in the service area would increase from 12,700 af/year in 1994 (of which 12,100 was consumed in the RUL) to 18,000 af/year (of which 14,300 would be required by the RUL). The cumulative effects of this demand depends of the availability of State Water Project entitlements. ~~The contracted amount to the year 2021 would be sufficient to satisfy this projected demand. Even if the State Water Project entitlement were reduced 45 percent, the remaining entitlement plus the safe yields from Lake Hennessey and Milliken Reservoir would satisfy the cumulative demand. If state water supplies are curtailed more than 45 percent, however, there would be significant cumulative impacts for water supply.~~ During drought years when water supplies from local sources are reduced and the City's SWP entitlements are cut back, the City faces a current deficit in water supplies as do many other State Water Contractors. The City's current deficit during drought years is 4,200 acre feet of water assuming a

reduction in SWP entitlements of 50% and a local reduction in water demands of 20% as a result of demand management programs which the City would implement during drought periods. The reductions in supply from the SWP is the reason why the City faces drought year water shortfalls. This existing 4,200 feet deficit in drought years will reduce each year as the City's SWP entitlement increases and based on the current schedule of entitlement build up from the SWP, the City will have sufficient water supplies in both dry and normal years after the year 2012. From 2012 to 2020, the City would have sufficient water supplies to meet drought year demands. The City's General Plan recognizes this potential drought year deficit and includes a series of policies to accelerate the SWP entitlement schedule, reduce demand through water conservation and monitor new water hook-ups until a reliable drought year water supply is ensured. The definition of "significance" in this regard should be noted under Section 3.4 in this EIR. The significant impact identified is not considered an impact to the public health and safety; there will be sufficient water to serve the basic health, hygiene and fire suppression needs of the community.

Cultural Resources. In the absence of stringent local historic preservation ordinances or regulations outside the City of Napa, development according to local general plans and ABAG's forecasts could cumulatively diminish the shared cultural heritage and number of historic structures in Napa County. Furthermore, the natural setting, given the number of waterways and the nearby mountains, is archaeologically sensitive, especially in the following County planning areas, Pope Valley, Berryessa, Napa Valley, and Napa Southeast (County General Plan, 1992). Thus, development in Napa County could disturb significant archaeological resources. These significant cumulative effects to the region's cultural resources could be mitigated through local efforts to inventory and protect significant historic resources, through environmental mitigation (adherence to CEQA Guidelines, Appendix K), and implementation of financial incentives (such as tax credits) to rehabilitate or adaptively reuse historic buildings. These are all measures the City is recommending in its General Plan to mitigate its share of cumulative impacts.

Visual Quality. As described above under Land Use, the cities and County cooperate to channel urban development into the cities and to use sphere of influence boundaries to contain urban expansion. Adoption of these concepts has the additional benefit of protecting much of the County's scenic resources, including its hillsides, agricultural lands, and wetlands, from urbanization. Thus, the cumulative effect of accommodating the ABAG forecasts in accordance with local general plans on the region's visual quality, as measured by the sense of openness, the relationship of the urban setting to the natural setting, and preservation of prominent visual resources, is insignificant.

The scenic views afforded from major public vantage points, including the County's roadways, are a key attribute of the region's visual quality. Maintaining the greenbelts around the incorporated communities serves to avoid the appearance of sprawl and protects views of the natural setting. In addition, both the City and Napa County have policies and programs to maintain and enhance the views from designated scenic highways and corridors. Thus, the cumulative impacts on views would be insignificant.

Biological Resources. The assessment of cumulative impacts on the overall land use pattern and on scenic resource in Napa County is relevant for biological resources. In other words, the containment of urban development within sphere of influence boundaries, which preserves the overall land use pattern and the region's scenic resource, would also serve to minimize disturbance of native grasslands, wetlands, and other sensitive biological communities and habitats. State and federal legislation impose further restrictions or require compensatory mitigation for loss of wetlands or rare/endangered plant and

animal species. Thus, the cumulative impact of development in the Napa region on biological resources would not be significant.

Geology, Soils and Seismicity. Accommodation of the ABAG forecasts for population, housing, and employment would mean more people and structures in the County would be exposed to major geologic and seismic hazards. Although local general plans, through the Safety Elements, seek to site development into less hazardous areas, there are geologic and seismic hazards zones that are widespread throughout the County. Specifically, much of Napa County would be subject to very strong groundshaking in the event of a major earthquake along the nearby regional faults (San Andreas, Healdsburg-Rodgers, Hayward, and Calaveras) and local faults (West Napa). Liquefaction, landslides, and localized settlement would also damage roads, foundations, and utility lines. These significant cumulative effects would be mitigated to an acceptable level through strict adherence to local building codes, implementation of recommendations arising from project-specific geotechnical studies, imposition of regulations to deal with non-structural hazards during earthquakes, and adoption of emergency preparedness and response plans. The City of Napa includes all of these measures in its General Plan and therefore would mitigate its contribution to the cumulative impacts.

Hydrology and Water Quality. Accommodation of the ABAG forecasts for population, housing, and employment would mean more people and structures in the County would be exposed to major flood hazards. Recent history in Napa provides evidence of how widespread and catastrophic the losses to life and property can be due to inundation. Floodplain regulations adopted by the Federal Emergency Management Agency and implemented by local jurisdictions limit the risk and the damage, but the cumulative effects of increased development in the floodplain would still be considered significant. These effects would be mitigated to an acceptable level through adoption of environmentally sensitive flood control measures, both structural and non-structural, and more restrictive land use controls. The City is working with the U.S. Army Corps of Engineers to reduce flood hazards through the central part of Napa.

Increased urbanization, along with continued intensive agricultural production, would have cumulative effects on water quality in the County's waterways. Greater pollutant loading would be expected from increased urban stormwater runoff, higher discharge volumes of treated wastewater, and continued agricultural drainages. These significant cumulative effects could diminish water quality and reduce the public's and wildlife's designated beneficial uses of the water resources (e.g., recreation, potable water supply, aquatic habitat). Mitigation for these effects would occur through issuance of the Regional Water Quality Control Board's National Pollution Discharge Elimination System permits, adoption of local urban stormwater management programs, imposition of buffers and land use controls near waterways, implementation of erosion and sedimentation programs, and imposition of controls on fertilizer, herbicide, and pesticide applications. The City's General Plan contains all of these measures, except the last one which is irrelevant within the RUL. Accordingly, the City is taking the necessary steps to minimize its share of the cumulative water quality impacts.

Air Quality. Development of the County in accordance with ABAG forecasts, adherence to the County Congestion Management Plan, and adoption of traffic control measures as described in Section 3.10 of this Draft EIR would enable the County to remain consistent with the Clean Air Plan. This Plan seeks to bring the entire Bay Area into conformance with ambient air quality standards. In addition, the Draft General Plan recommends other programs, such as improved jobs/housing ratio, expansion of non-automobile travel options, and traffic controls to enhance flow, that would reduce the overall

community's air emissions. Given the above measures, the cumulative effects of development in Napa County on air quality would be insignificant.

Noise. Noise exposure impacts are generally localized and concentrated around the noise source. Consequently, the relevant study area for cumulative noise impacts would be the City planning area. The major community noise source is traffic related. As noted above under Transportation, the traffic data used in this EIR already reflect cumulative development from areas outside the City planning area. Thus, the noise contours, presented in Section 3.11 of this document, are based on cumulative traffic volumes. The analysis reveals that cumulative noise effects would be not be significant.

Public Health. Increased development in accordance with ABAG forecasts would result in greater generation, storage, and disposal of hazardous materials. Routine procedures for handling, transporting, and disposing hazardous materials and waste would reduce risk of public exposure to an acceptable level. There are, however, accidental releases that could expose sensitive receptors to significant concentrations of hazardous materials. With the growth of the County, more residents, employees, and visitors may be exposed to accidental releases; however, as noted in Section 3.12 of this document, the County is ranking those businesses that pose the greatest risk and will be requiring them to prepare Risk Management Prevention Plans. These Plans will contain corrective measures to take in the event of an accidental release. Adoption of these plans, along with recommendations in the County's Integrated Waste Management Plan, would minimize public health risks from hazardous materials to an acceptable level.

As the incorporated communities build out, there would likely be increased wildland fire hazards at the urban/rural interface. These high fire hazards would arise as urban uses develop on hillsides where natural vegetation provides fuel for wildland fires. This cumulative significant effect can be mitigated through requiring fuel breaks, minimum clearance around structures, adequate onsite water supply, and prescribed burns. The City's General Plan and Policy Resolution No. 27 reflect these measures, except the last one which is not relevant for an individual city. Thus, the City is mitigating its contribution to cumulative wildland fire impacts.

4.5 Significant Irreversible Environmental Changes Resulting from Implementation of the Project

Implementation of the land use policies of the proposed project would result in the irreversible commitment of vacant and underutilized lands for development. Although such commitment may not be completely irreversible, since buildings can be removed, the likelihood of this occurring is infeasible given the substantial commitment of economic resources.

Non-renewable resources, such as building materials for construction and energy for the continued operation of new development and/or redevelopment would also be irreversibly committed. Given current and projected energy consumption patterns, a certain amount of fossil fuel resources, including fuel oil, natural gas, gasoline for vehicles and many petroleum based products used in a typical household, would be consumed with the implementation of the proposed project.

Although these are irreversible changes, they are not considered to be adverse changes. Rather, they represent reasonable tradeoffs to provide for an urban-centered development scenario that optimizes the use of existing infrastructure and land and preserves important agriculture and open space resources in

the County. In conclusion, the Draft General Plan is designed to mitigate the significant impacts that would result from an uncontrolled growth pattern.

4.6 Mitigation Monitoring and Reporting

Public Resources Code, Section 21081.6 requires public agencies to monitor the effectiveness of mitigation measures adopted for any "project." In accordance with the section of the Public Resources Code, agencies must establish a monitoring program at the time of project adoption.

As described in Chapter 3 and the preceding sections of Chapter 4 of this Draft EIR, the Draft Napa General Plan contains policies and implementation programs that function as mitigation measures for significant environmental effects that may result from future development enabled by the General Plan. These measures are, in essence, part of the proposed project and enable the City to describe potential impacts as being insignificant.

The application of these policies to individual public and private development applications and other actions by the City will ensure that significant environmental effects are reduced to the extent feasible. In addition, standard mitigation measures and conditions of approval contained in City Policy Resolution No. 27 further serve to minimize impacts at the project-level environmental review.

In order to comply with subdivision (a) of Public Resources Code, Section 21081.6, which requires the City to monitor the effectiveness of mitigation measures adopted for any project, the City will perform the following three activities, each of which is also identified as an implementation action in the General Plan:

1. The City will ensure that future actions (project approval or other activity) are consistent with the policies of the Napa General Plan. This step will occur during the review of the application materials or plans for future projects. In so doing, the City will be implementing the policies of the General Plan that function as mitigation measures. (This step is recommended as part of Implementation Program A-1.E of the Draft Policy Document.)

2. The City will confirm whether a proposed project or contemplated action complies with all of the General Plan policies and any other mitigation measures that have been imposed at the project level to reduce significant effects. This step will be performed during City review and approval of individual development applications, public works projects, or other actions affecting the planning area. Furthermore, the City will require a separate mitigation monitoring and reporting program as part of any discretionary project approval to ensure compliance with all adopted mitigation measures at the project level. The project-specific mitigation monitoring and reporting programs will be consistent with statements in the Final EIR for the General Plan. (This step is recommended as part of Implementation Program A-1.E of the Draft Policy Document.)

3. The City will demonstrate that it is carrying out the policies and implementation programs of the General Plan, and thus the EIR mitigation measures as well. This will be accomplished as part of the annual report that City staff is required to provide to the City Council regarding the progress and status of the General Plan. The annual report is stipulated by State planning law (Government Code, Section 65400[b]) and can be adapted to also comply with State law governing mitigation monitoring and reporting. The annual report will indicate for each policy

or set of policies, those actions that have been taken to implement the policies (e.g., amend the zoning regulations, update the Capital Improvement Program, amend the Street Improvement Fee Program, etc.); who was responsible for implementing the action; and what level of success the policy(s) had towards mitigating/avoiding the impacts. City staff shall incorporate in its annual report to the City Council the necessary findings to comply with Public Resources Code, Section 21081.6 (This step is recommended as part of Implementation Programs A-1.A and A-1.D of the Draft Policy Document.)

Chapter 5
Alternatives

5.1 INTRODUCTION

This section describes alternatives to the proposed project. The California Environmental Quality Act (CEQA) requires that alternatives that can feasibly attain the basic objectives of the project be considered. The purpose of this mandate is to provide the decision-makers with an opportunity to evaluate the comparative merits of the alternatives. The discussion of alternatives must indicate whether an alternative has been rejected from further consideration and, if so, why it was rejected.

It is noted that the alternatives presented here include the No Project Alternative as required by CEQA, as well as other alternatives that have been considered as part of the planning process. The City has completed nearly six years of planning study, during which a number of alternatives and ideas have been advanced and evaluated. These alternatives were described in the *Futures Report* (January 1990). As the planning program has evolved, the most viable alternatives are those that share the same fundamental objectives that have guided the formulation of policies articulated by the Draft Policy Document:

1. Contain growth within the Rural Urban Limit Line.
2. Conserve the character of existing neighborhoods.
3. Improve the City's jobs/housing balance.
4. Recognize the fragility of Napa's precious natural resources and focus protection on wetlands, other scarce habitats, hillsides and agricultural lands adjacent to but outside the RUL.
5. Promote a sustainable economy: a healthy economy with jobs that "fit" the needs of residents.
6. Maintain a vital and healthy Downtown.
7. Consider the environmental and financial costs of flood control along the Napa River and encourage appropriate development.

Adherence to the first and fourth objectives suggests alternatives that propose urban development within an RUL that conserves as much agricultural land and natural resources as possible. In other words, the most viable alternatives would likely be those that maintain the existing RUL boundary or permit some modest expansion. The second objective suggest that alternatives should respect the character of existing neighborhoods including preservation of quality of life and historic structures. Thus, alternatives that adjust the infill strategy of the 1982 General Plan by reducing residential densities would be considered viable options for consideration in this EIR. The third, fifth, and sixth objectives relate to economic considerations and acknowledge the need to improve the City's job/housing balance, to promote a sustainable economy, and to maintain a vital and healthy downtown. Viable alternatives would include those that promote affordable housing and high-paying jobs. At the gross level at which these alternatives have been formulated (i.e., broad land use patterns and location of development), it is not

obvious whether the alternatives satisfy these objectives. Alternatives that generally promote more jobs relative to housing, however, would be considered supportive of the objectives. The seventh objective suggests that alternatives encourage appropriate development along the Napa River after consideration of the environmental and economic costs of flood control in this area.

Finally, CEQA requires that a reasonable set of alternatives be formulated in order to provide the decision-makers with a full picture of potential impacts and mitigation measures. Section 15126(d)(3) of the CEQA Guidelines notes that the discussion of alternatives should focus on those alternatives capable of eliminating any significant environmental adverse effects of the proposed project.

In light of these objectives and CEQA's directions, this section of the EIR does not present wholesale variations to the proposed plan as described in Chapter 2; rather, it reviews those scenarios considered during the *Futures Report* that could be considered viable alternatives to the proposed project. The *Futures Report* identified 15 future alternative land use strategies for the update of the 1982 General Plan. Seven different strategies were formulated that retained the existing RUL but shifted the amount, location, or intensity of the community's housing potential. Another eight scenarios were devised to explore different areas where the RUL could be expanded. The population and housing estimates developed for each scenario were intended to give the community and the City Council a better sense of long-term (2010 or 2020) land use alternatives.

5.2 DESCRIPTION OF ALTERNATIVES

As explained above, the *Futures Report* examined two types of alternatives; one set maintains the existing RUL line and varies development potential within this boundary and the second set considers modifications to the RUL line. The first type is denoted below with a prefix, "A." The second type is denoted with a prefix, "B."

Initial Alternatives

A-1 Existing Policy — continues existing 1982 General Plan policies; this is the equivalent of the No Project Alternative in which the Draft Policy Document would be rejected and future development would occur in accordance with the City's existing policies.

A-2 Existing Policy with Shift in Housing within Selected Planning Areas — continues existing 1982 General Plan policies but lowers residential densities near the RUL line and increases densities away from the RUL line. Under this alternative, residential development potential would be reassigned from vacant/underutilized properties with relatively high potentials and from locations which have prompted concerns over agricultural preservation and/or neighborhood compatibility problems to more compatible locations within the same planning area.

A-3 Existing Policy with Shift in Housing within the RUL Line — continues existing 1982 General Plan policies but lowers residential densities on some properties near the RUL line and increases densities at selected locations away from the RUL line, allows residential development in the Flood Evacuation Area, and contemplates development of the Stanly Ranch. This alternative assumes implementation of flood control facilities or repeal of the City's flood evacuation policies.

A-4 Decrease Housing City-Wide — reduces permitted development of each residential land use classification by about 25 percent to more closely reflect actual development patterns, to minimize compatibility problems within residential neighborhoods, and to improve the City's jobs/housing ratio.

A-5 Selective Decrease in Housing — reduces development potential of the 1982 General Plan by selectively reducing densities on vacant and underutilized properties, mostly those near the RUL line. The vacant/underutilized properties which are reclassified for lower residential densities are the same as those from which housing units were shifted in Alternatives A-2 and A-3 (see Figure 5-1).

A-6 Increase Housing City-Wide — increases permitted development of each residential land use classification by about 25 percent.

A-7 Selective Increase in Housing — increases development potential of the 1982 General Plan by selectively increasing densities on vacant and underutilized properties, including properties in the Flood Evacuation Area and at Stanly Ranch. As with Alternative A-3, this alternative assumes implementation of flood control measures or repeal of the City's flood evacuation policies.

B-1 Minor Expansion of the RUL Line — minor expansion of the RUL line in nine areas that would "round off" the boundaries, as well as other areas where property owners or the City Council have expressed interest in potential annexation or connection to the water and wastewater systems. Areas for which annexation inquiries have been made include Alston Park (157 acres) west of the Linda Vista Planning Area, the Philbin and Raynes properties (181 acres) to the west of the Westwood Planning Area, and the industrial area between Soscol Creek and the Southern Crossing (108 acres) south of the River East Planning Area. Figures 5-2 and 5-3 generally depict the expansion areas included in this alternative.

B-2 through B-8 Major Expansion of the RUL Line — these scenarios would expand the RUL line to include:

B-2 - Dry Creek Area

B-3 - Oak Knoll Area

B-4 - Silverado Area

B-5 - Coombsville Area

B-6 - Suscol Ridge Area

B-7 - Stanly Ranch Area (this refers to 1,400 acres to the north and west of Stanly Ranch)

B-8 - Congress Valley Area

Range of Development Potential

The range of development potential of the above-listed alternatives is defined in Table 5-1. The buildout projections are only estimates developed for the purpose of comparing the land alternatives. They are not time-specific in that they do not predict population, housing, and employment for a fixed future year. Rather, these figures are intended as a level of development in the long-term beyond 2005. How quickly the development levels are reached will depend on availability of services, the City's growth management

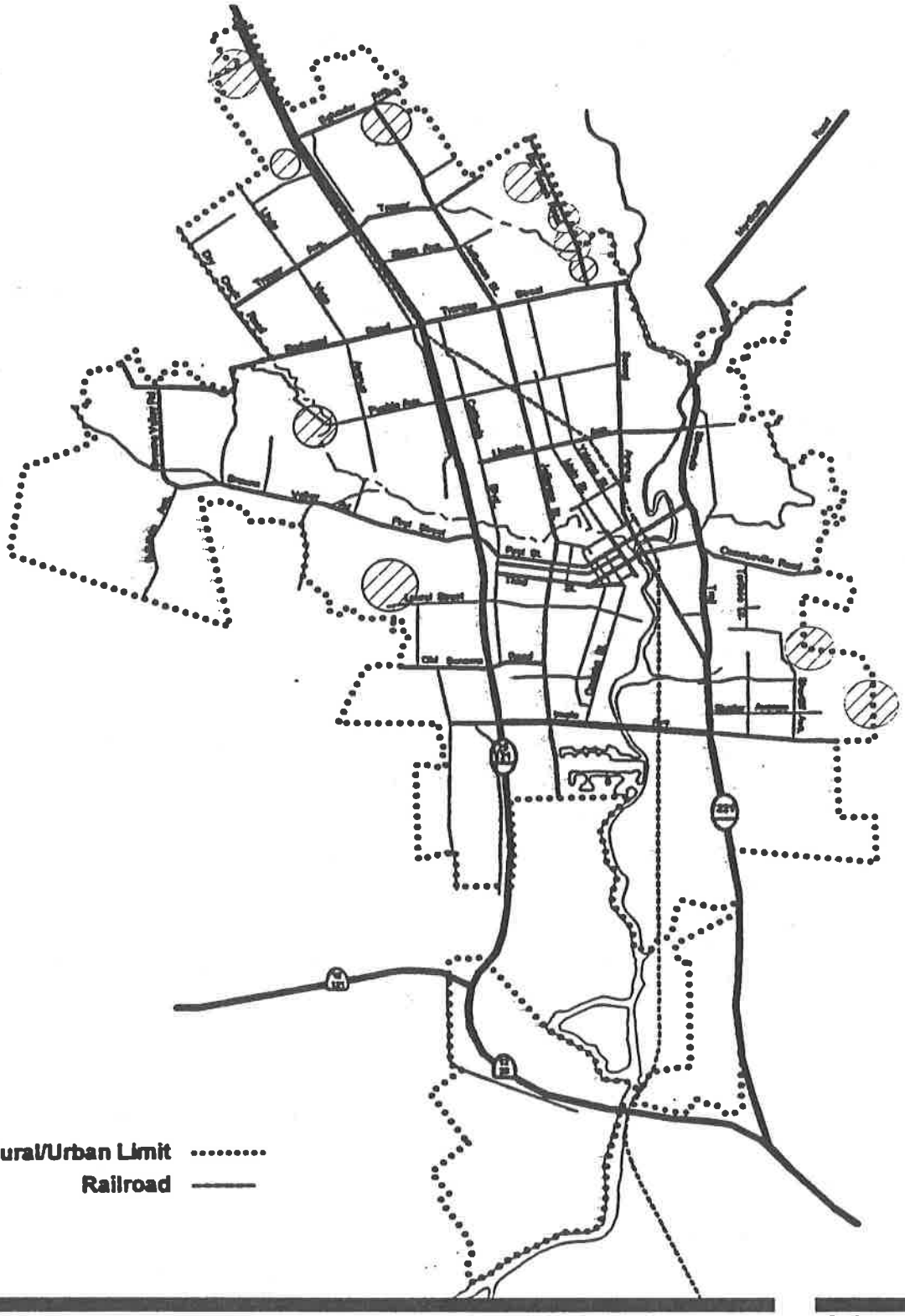


Figure 5-1

Scenario A-5
(Reduced Growth Alternative 3)

North

Areas to Decrease Densities

725' 1/2 Mile 1 Mile 3 Mile

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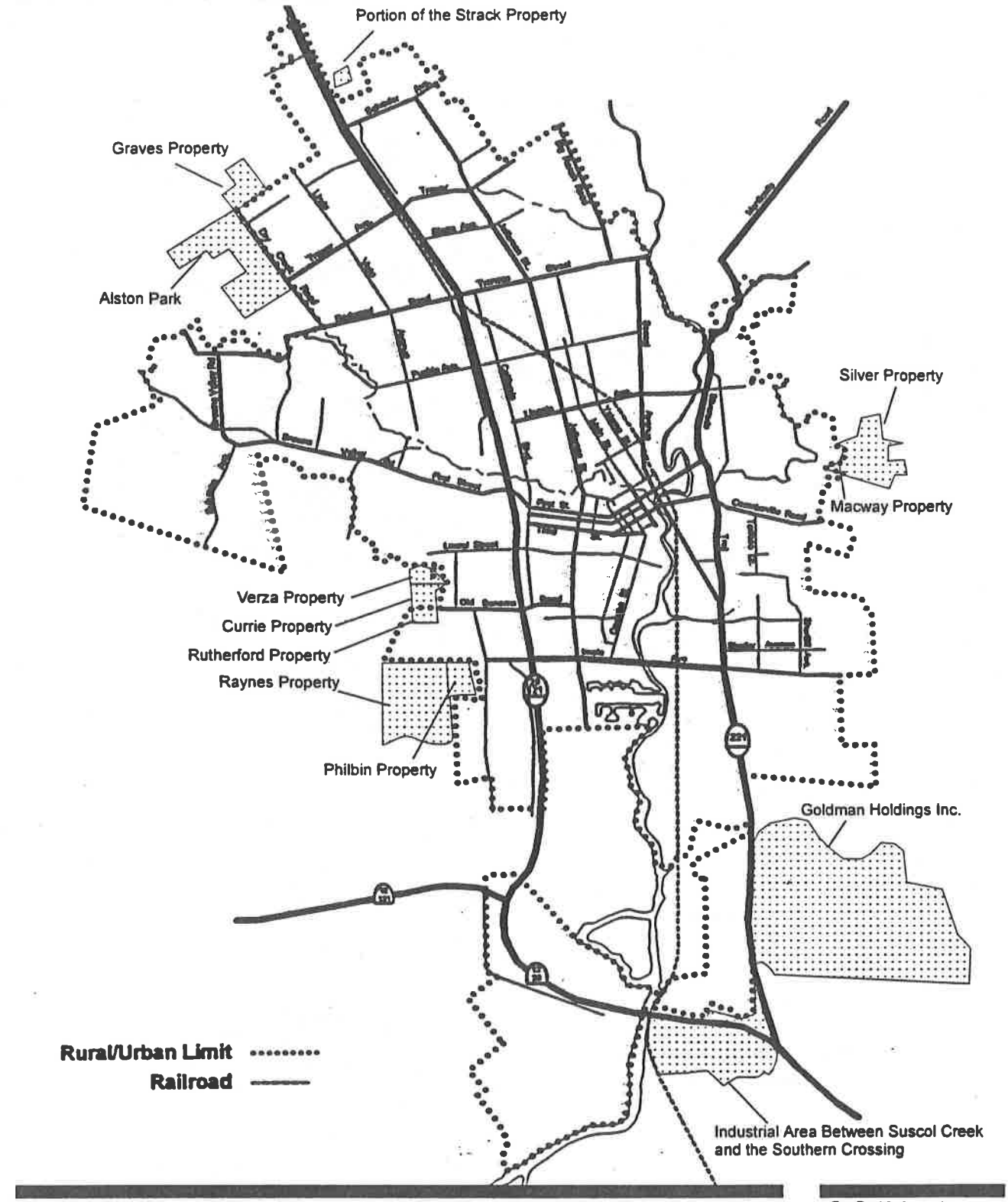


Figure 5-2a

Scenario B-1
(Expanded RUL Alternative)

North

Annexation Inquiries

725' 1/2 Mile 1 Mile 3 Mile

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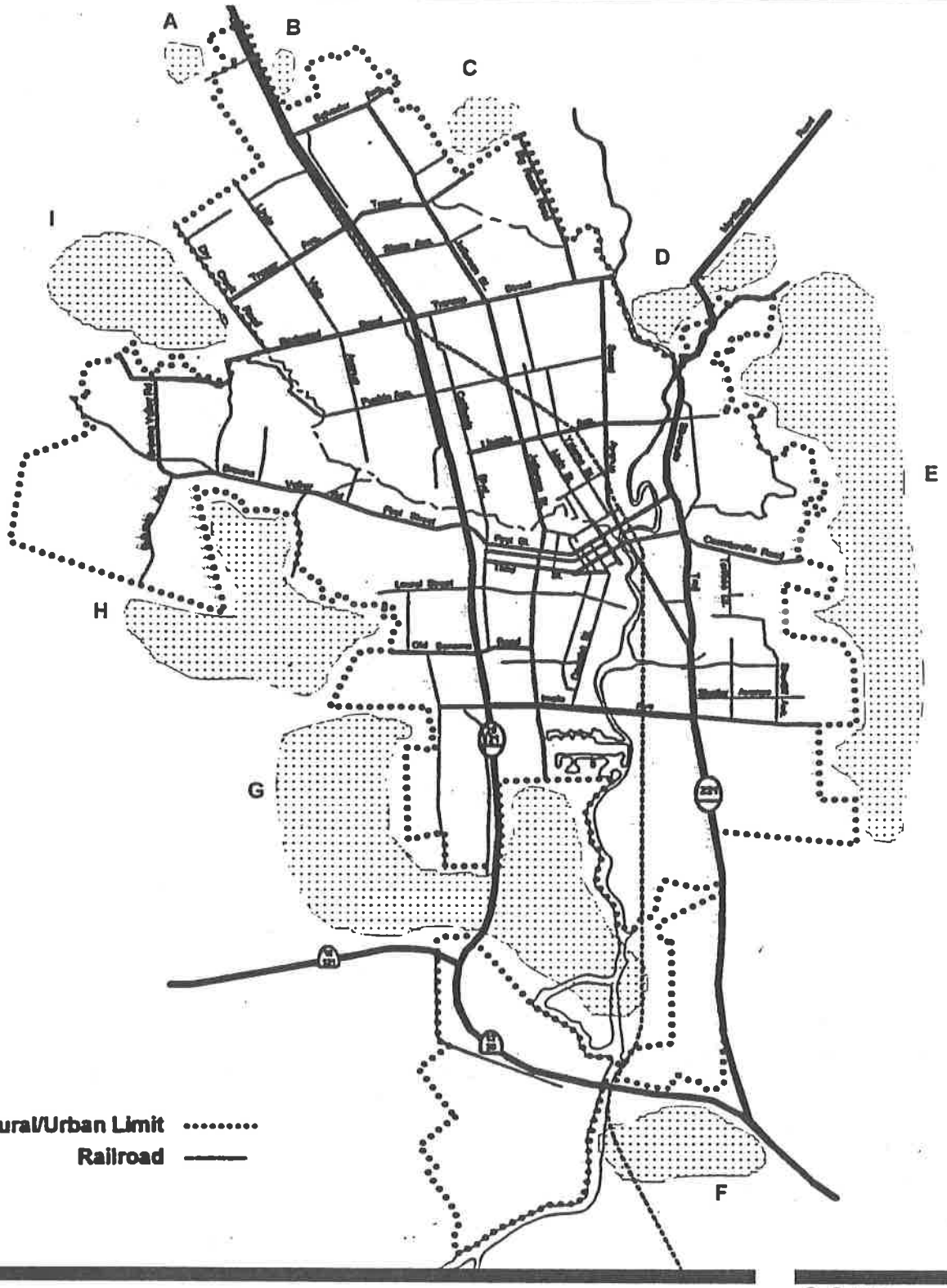


Figure 5-2b

Scenario B-1
(Expanded RUL Alternative)

North

Potential Expansion Areas

725' 1/2 Mile 1 Mile 3 Mile

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Table 5-1
Development Potential by Alternative

Alternative	RUL Line Population Buildout	Incremental RUL Line Population *
A-1	71,400-83,700	12,700-25,000
A-2	71,700-84,100	13,000-25,400
A-3	71,900-83,400	13,200-24,700
A-4	67,500-78,300	8,800-19,600
A-5	69,300-78,800	10,700-20,200
A-6	75,400-88,200	16,800-29,500
A-7	75,500-90,800	16,900-32,200
B-1	82,300-100,100	11,000-16,400
B-2	79,400-93,800	8,100-10,100
B-3	82,600-97,700	11,200-14,000
B-4	85,000-102,300	10,000-15,000
B-5	90,200-111,100	17,200-25,800
B-6	76,900-92,100	5,600-8,400
B-7	79,700-94,100	8,300-10,400
B-8	86,900-106,900	15,500-23,200

Source: Futures Report, 1990.

* These figures represent the additional persons within the existing RUL above the existing conditions, plus the additional population accommodated by expanding the RUL (for the B alternatives only).

program, annexation applications, and the general economic conditions in the region. For comparison sake:

- the estimated population within the RUL line in 1995 was 69,700;
- the existing General Plan, or the No Build Alternative, would result in a buildout population of at most about 83,700; and
- the proposed project would result in a buildout population of about 81,100 by 2020.

The buildout and incremental population figures for the RUL scenarios (the "B" alternatives) assume that the RUL alternative is combined with the policies and development program for Alternative A-1 Existing Policy.

Alternatives Screening

Each of the B alternatives involving major expansion of the RUL line (B-2 through B-8) is rejected as an EIR alternative for further consideration because they would result in loss of agricultural soil resources; loss of existing vineyards; disturbance to open space, wildlife habitat, and wetlands; diminution of a sense of community size and character; additional demands on community services and utilities; and conflicts with county land use policies (principally those related to Agricultural Preserve, Agricultural Watershed). Not only do these "expansion" alternatives result in significant environmental impacts, they would not be consistent with the first and fourth community objectives (containing urban expansion and protecting natural resources). Furthermore, their emphasis on additional residential development is not consistent with improving the jobs/housing ratio (the third objective).

On the basis that alternatives should generally seek to minimize significant effects related to the proposed project, as directed by the CEQA Guidelines 15126(d)(3), the following alternatives that reduce the overall development potential within the RUL are considered viable alternatives to the proposed project: A-4 Decrease Housing City-Wide and A-5 Selective Decrease in Housing. Alternatives A-6 and A-7 which increase housing potential city-wide and selectively would not reduce impacts associated with the proposed project substantially nor be significantly different as to provide the City's decision-makers with an understanding of policy tradeoffs. In addition, Alternative A-7 assumes implementation of the flood control projects or repeal of the flood evacuation policies, neither of which is anticipated. Alternatives A-2 and A-3 would not reduce the RUL development potential and therefore would not minimize impacts. Alternatives A-2 and A-3 are not considered further since they are not significantly different than the No Project Alternative which is already being evaluated. Alternative A-6 and A-7 would not reduce impacts and would not be consistent with the second and third objectives; therefore, they are not considered further.

EIR Alternatives

Based on the above assessment, the following set of alternatives is addressed further in this EIR:

- No Project Alternative (A-1)
- Reduced Growth Alternatives
    1. No Growth
    2. Decrease Housing City-Wide (A-4)
    3. Selective Decrease in Housing (A-5)
- Expanded RUL Alternative (B-1)

The last alternative is presented largely for the purpose of comparison, even though it allows for expansion of the RUL.

5.3 ALTERNATIVES ANALYSIS

No Project Alternative

The No Project Alternative must be evaluated pursuant to CEQA. This alternative would retain the policies and implementation strategies of the 1982 General Plan as it has been amended (i.e., State mandated updates to the Housing Element and the adoption of the Parks and Recreation Element). This alternative would fail to address the concerns that precipitated the current General Plan Update; namely, inability to protect the City's residential neighborhoods and their character. Moreover, the No Project Alternative would inadequately account for new state and federal requirements that affect the City's long-range physical development. Such requirements concern congestion management, air quality protection, regional fair share housing requirements, and jobs/housing balance. Similarly, the existing General Plan is ill equipped to deal with growing local concerns over historic preservation and urban design.

The No Project Alternative would permit a greater development potential than is currently envisioned by the Draft Policy Document. The number of units permitted under the No Project Alternative would be about 1,000 units more than the proposed project; population would be about 2,600 greater under the No Project Alternative. Planning Areas that would experience a substantial absolute increase relative to the proposed project (i.e., greater than 300 residential units) include Linda Vista, Browns Valley, Westwood, Terrace/Shurtleff; those that would experience a substantial absolute decrease (i.e., greater than 300 residential units) include Stanly Ranch. More notably, the No Project Alternative anticipates 800,000 square feet more commercial and industrial square footage. The biggest variance occurs in River East, where the No Project Alternative proposes more than 2.8 million square feet of additional space; whereas, the proposed project calls for an increment of slightly over a million square feet.

Environmental Assessment. On a citywide basis, the No Project Alternative would pose greater population-driven impacts, i.e., traffic, air quality, noise, and community services, than the proposed project. With the traffic improvements and control measures recommended in the Draft Policy Document, the No Project Alternative may leave nine signalized intersections at unacceptable service levels and may be inconsistent with the Clean Air Plan. Ambient noise levels and demand for community services would increase but, like the proposed project, the effects would not be significant. In addition, the following additional adverse effects are associated with the No Project Alternative:

- relatively high densities would remain near the RUL line, affecting the agricultural/urban interface;
- residential infill densities could continue to exceed those of existing development, creating land use conflicts and detracting from the neighborhood character;
- efforts to protect historic structures and enhance urban design would not be supported; and
- proposed new roads to complete missing road segments would not be adopted.

Conformity with Community Objectives. The No Project Alternative does not propose any modification to the existing RUL. From this perspective, it would be consistent with the first and fourth objectives; namely, to protect the agricultural and natural environment and to contain the City's urban expansion.

As noted above, one of the issues that prompted the current General Plan Update was the fact that the 1982 General Plan allows residential development at densities greater than what is currently built. As a result, higher density residential infill has created land use conflicts between higher and lower density development and has resulted in the removal of historic structures and the loss of community character. Accordingly, the No Project Alternative, which would do nothing to remedy these issues, would not satisfy the second objective, which concerns preservation of quality of life, neighborhood character, and historic structures.

Because the No Project Alternative would increase jobs and housing units, compared to the proposed project, the jobs/housing ratio for this alternative would be comparable to that of the proposed project. As a result, this alternative would be consistent with the third objective (i.e., to improve the City's jobs/housing balance).

The No Project Alternative would permit greater development than currently envisioned under the Draft Policy Document (1,000 more units and 800,0000 square feet more commercial and industrial square footage). This alternative would conform to the fifth objective (i.e., promotion of a sustainable and healthy economy). The existing 1982 General Plan includes policies to revitalize Napa's Downtown and thus would be considered supportive of the sixth objective (i.e., commitment to downtown's revitalization).

The No Project Alternative retains the policies and programs of the 1982 Napa General Plan, including Policy 5a of the Seismic Safety/Safety Element, which states that residential developments in the Flood Hazard Area of more than four units shall only be permitted when the flood evacuation needs of future residents have been addressed to the satisfaction of the Public Works Director. Adherence to this policy would ensure consistency with the seventh objective (i.e., encouragement of appropriate development in the flood hazard area of the Napa River).

Summary. The No Growth Alternative would not address critical issues that arose from implementation of the 1982 General Plan and would be inferior to the proposed project.

Reduced Growth Alternative 1: No Growth

The No Growth Alternative assumes that further growth in Napa would not occur, with the exception of already permitted development. Under this "no build" alternative, the policies and procedures of the existing 1982 General Plan would govern the physical development of the City. As defined, this alternative satisfies legal interpretations of CEQA that one alternative must describe maintenance of the existing environment as a basis for comparison of the suggested alternatives to the status quo.

This alternative would maintain the existing number of housing units at 27,100, or 7,800 fewer dwelling units than would be allowed under the proposed project. Existing commercial and industrial square footage would remain at about 7 million, or 3.2 million less than under the proposed project.

Environmental Assessment. Under the No Growth Alternative, loss of existing agricultural lands within the RUL would not occur, ten intersections that are projected to deteriorate to unacceptable levels would continue to operate acceptably, two residential areas that are projected to experience normally unacceptable sound levels would continue to enjoy acceptable ambient conditions, and air quality conditions would remain unchanged. Because this alternative would not result in any new residential development, there would be no adverse impacts to land use, community services or utilities, visual resources, natural resources, and public health.

Conformity with Community Objectives. The No Growth Alternative would be consistent with the first and fourth objectives since it would retain the existing RUL; thereby preserving agricultural lands and the natural environment and containing urban expansion. Because no new development would occur under this scenario, this alternative would neither degrade Napa's quality of life nor result in loss of historic structures. It is acknowledged, however, that redevelopment of existing developed areas at higher densities can occur under the No Growth Alternative. Thus, this alternative would not conform to objective 2 (i.e., conserving the character of existing neighborhoods).

The No Growth Alternative would also be inconsistent with the fifth and sixth objectives (i.e., to promote a sustainable economy and to revitalize downtown). This alternative would frustrate revitalization of the downtown and constrain overall residential/economic development. This same limitation would preclude the City from expanding its housing stock. As a result, new affordable units would not be provided and the costs for those remaining available units would likely rise because of the limited housing supply. These conditions would not improve the City's jobs/housing balance, and therefore this alternative would be inconsistent with objective 3.

Like the No Project Alternative, Policy 5a of the Seismic Safety/Safety Element of the 1982 Napa General Plan would continue to apply. Through adherence to this policy, this alternative conforms to the seventh objective.

Summary. Because of this alternative's conflicts with basic objectives underlying the community vision and the long-term impracticality of implementing this alternative, it is rejected as a realistic alternative.

Reduced Growth Alternative 2: Decrease Housing City-Wide

This alternative recognizes that neighborhood character and stability was threatened by the 1982 General Plan policy of encouraging of higher density infill development. Reduced Growth Alternative 2 would

decrease the permitted densities of each residential land use classification by about 25 percent. As a result, the projected buildout under this scenario would be about 67,300 to 78,300, or 2,800 to 13,800 fewer persons than under the proposed project. Commercial and industrial development would be expected to occur similar to that planned under the proposed project.

Environmental Assessment. Reduced Growth Alternative 2 would minimize the adverse effects identified for the proposed project that relate to population. In other words, adverse trip generation, air emissions, noise, and community service impacts would all be reduced to a limited extent. The reduction is moderated given that commercial and industrial development would remain comparable to the proposed project, meaning that the only actual change is linked to the fewer number of residential units. This alternative as originally conceived does not include the urban design considerations found in the land use designation system of the Draft Policy Document. Thus, while Reduced Growth Alternative 2 would eliminate the pressures to redevelop infill areas at higher densities, it does not function as well as the proposed system at preserving the character, pattern, and typology of existing residential development. Furthermore, an across-the-board reduction in residential densities as recommended by this alternative would be contrary to the City's objectives of promoting affordable housing and may frustrate efforts to satisfy regional fair share housing requirements.

Land-driven impacts, such as disturbance of natural resources and encroachment into natural and man-made hazards areas would be similar to those identified for the proposed project.

Conformity with Community Objectives. This alternative is similar to the No Project Alternative in terms of retaining the existing RUL boundary. Accordingly, it would satisfy the first and fourth objectives to protect agriculture and the natural environment and to contain urban expansion.

In general, the overall reduction in residential densities would result in infill development being more compatible with existing development, thereby reducing potential land use conflicts. Similarly, without the higher densities, there would be less incentive to redevelop areas, thereby protecting existing historic resources. Accordingly, Reduced Growth Alternative 2 would be supportive of the second objective. The Reduced Growth Alternative 2, however, would constrain residential development which could detract from efforts to revitalize downtown (the sixth objective). The decrease in the number of housing units would diminish the City's surplus of housing units relative to jobs and thus improve the jobs/housing ratio (the third objective). Because this alternative only addresses broad land use patterns, it cannot be readily determined whether the City will be able to sustain a viable and healthy economy (the fifth objective). Policy 5a of the Seismic Safety/Safety Element of the existing General Plan would still apply, making this alternative consistent with the seventh objective (i.e., encouragement of appropriate development in the flood hazard area of the Napa River).

Summary. Because Reduced Growth Alternative 2 does not provide any compelling benefits relative to the proposed project (that is, a clear reduction in the number and magnitude of significant effects identified for the proposed project), would be less successful at protecting neighborhood character than the proposed project, and would create greater impacts in certain areas, it would be considered inferior to the proposed project.

Reduced Growth Alternative 3: Selective Decrease in Housing

This alternative recognizes that the City needs to protect open space surrounding the City, reduce development pressures on the outlying areas, and minimize potential conflicts between residential development and agricultural operations. Reduced Growth Alternative 3 would decrease the development potential in the RUL line by about 17 percent, by selectively reducing densities on vacant and underutilized properties near the RUL line (see Figure 5-1). As a result, the projected buildout under this scenario would be about 69,300 to 78,800, or 2,300 to 11,800 fewer persons than under the proposed project. Commercial and industrial development would be expected to occur similar to that planned for under the proposed project.

Environmental Assessment. Reduced Growth Alternative 3 would minimize the adverse effects identified for the proposed project that relate to population. Trip generation, air emissions, noise, and community service impacts would all be reduced to a limited extent, but even less so than for Reduced Growth Alternative 2. The reduction is further moderated given that commercial and industrial development would remain comparable to the proposed project, meaning that the only actual change is linked to the fewer number of residential units.

Under Reduced Growth Alternative 3, land-driven impacts such as loss of natural resources and increased exposure to public safety risks would be comparable to those under the proposed project and Reduced Growth Alternative 2.

On the other hand, this alternative does not propose to reduce permitted densities in the residential land use designations. As a result, the same problems that exist with the 1982 classification system persist; i.e., infill development that need not conform to the existing character, pattern, and density of residential development which undermines neighborhood stability and creates pressures to redevelop older areas with historic buildings.

Conformity with Community Objectives. This alternative is similar to Reduced Growth Alternative 2 and thus fares similarly to Reduced Growth Alternative 2 in terms of conformity with community objectives. The two objectives where Reduced Growth Alternative 3 scores lower are the protection of neighborhood quality and preservation of historic resources (the second objective). This assessment is based on the fact that this alternative would not reduce the permitted residential densities (as under the proposed project and Reduced Growth Alternative 2) but leave them at the levels of the 1982 General Plan.

Summary. Because Reduced Growth Alternative 3 does not provide any compelling benefits relative to the proposed project (that is, a clear reduction in the number and magnitude of significant effects identified for the proposed project) and would be less successful at protecting neighborhood character than the proposed project, it would be considered inferior to the proposed project.

Expanded RUL Alternative

Expansion of the RUL to "round off" the RUL and to reflect property owner interest in future annexation and/or water service extension is contemplated by this alternative. Also included are properties such as Alston Park and the properties located north of Soscol Creek and south of the Southern Crossing that various past City Councils have expressed an interest in annexing. Figures 5-2 and 5-3 indicate the areas

encompassed by the revised RUL proposed by this alternative. Overall, the RUL would be enlarged by approximately 4,000 acres, which would be developed at 2-3 du/ac to reflect terrain and other constraints. At buildout, this alternative would have a maximum population of 100,100, about 19,000 or 23 percent greater than the proposed project.

Environmental Assessment. Because expansion of the RUL would result in a greater population than projected for the proposed project, those impacts that are population driven would be greater under this alternative. In particular, traffic congestion and demand for community services would increase proportionately. Existing congested segments, such as Trancas and State Highway 221, and congested intersections at Highway 29/Highway 12/121, Highway 221/Highway 12/29, and Soscol/Imola would experience greater volumes than under the proposed project, as a result of the additional development proposed in the Dry Creek, Stanly Ranch, and Southern Crossing areas, plus the annexation area in the Suscol Ridge Area.

The expansion of the RUL, in some cases relatively extensive distances beyond existing desired service areas (e.g., into Stanly Ranch, Coombsville, and the Southern Crossing), would increase housing and population in peripheral areas, thereby increasing response times; and accommodate housing and population in steeper areas, further inhibiting emergency response and requiring special equipment (i.e., high clearance, four-wheel drive vehicles that can negotiate the tree/brush covered slopes). The extension of water and sewer systems to areas now unserved would also increase the burden on the existing water and wastewater treatment facilities and may induce additional development pressures (since the availability of water and wastewater systems would make the land more attractive to urbanization). The State Water Department has indicated that it will have difficulties fulfilling the City's NBA entitlement beyond that which would serve the population anticipated under the proposed project. Thus, this alternative with a maximum population 19 percent beyond that of the proposed project would exceed the City's water supply capabilities.

Besides increased demands on the City's infrastructure, the expansion of the RUL would alter the land use pattern and, to a certain extent, the character of Napa. Over 60 percent of the 4,000 acres included in the RUL expansion areas are currently undeveloped or considered agricultural resources. Expansion areas in Dry Creek, Congress Valley, Stanly Ranch, Suscol Ridge, and large portions of Coombsville would encroach into areas currently designated by the County for Agricultural Watershed; these are areas that the County seeks to maintain in low intensity uses compatible with watershed management. Urbanization/annexation of these areas would conflict with this objective and begin to erode the long-standing greenbelt concept that has been a fundamental principle of Napa planning.

Proposed expansion into the Congress Valley, Stanly Ranch, and Coombsville areas would encompass lands under Williamson Act contracts and may therefore induce premature conversion of these lands from agricultural uses to urban uses. Of the acreage included by this alternative, nearly 520 acres are currently planted as vineyards; thus, this alternative would lead to a significant loss of agriculturally productive land. A number of unique and important farmlands as mapped by the State Department of Agriculture would be disturbed by proposed expansion, primarily in the Stanly Ranch and Coombsville Areas. In the same vein, prime and important state farmlands would be lost along Highway 121 in the Silverado Area and in the Dry Creek Area.

Finally, expansion of the RUL would introduce urban development into more areas with natural hazards or sensitive resources. The areas proposed for expansion occur on steeper slopes, upslope from the valley floor and are susceptible to slope instability, especially for the area in Congress Valley, and greater erosion potential. The western portions of the Stanly Ranch expansion area lie in a high/moderate fire hazard area. The greater expanse included under this alternative, particularly on the nearby hillsides, increases this alternative's likelihood of encroaching into rare and endangered plants and animal habitats.

Conformity with Community Objectives. The first objective involves continued use of the RUL and greenbelt concept to contain the City's expansion. The Expanded RUL Alternative, while retaining the notion of an RUL, proposes extension of the RUL. Extension for the sake of "rounding off" the boundary may make some planning sense but it is not a prerequisite for a good plan. The *Futures Report* projects that the Expanded RUL Alternative would provide sufficient housing to last 26 to 45 years, far beyond the 2020 planning horizon (assuming the average annual rate of housing development experienced between 1980 and 1990 of 400 units per year). As a result, it is concluded that the areas encompassed by the Expanded RUL Alternative are excessive for the planning horizon and could permit premature development. Moreover, it undermines efforts to emphasize infill development and to take advantage of existing infrastructure capacity. Thus, the Expanded RUL Alternative would not be consistent with the first objective.

The Expanded RUL Alternative may be comparable to the proposed project with respect to the second and sixth objectives (i.e., protection of neighborhood character and commitment to downtown revitalization). If the residential typologies and residential land use designations recommended as part of the proposed project are embraced as part of this alternative, then future infill development under the Expanded RUL Alternative would be sensitive to existing neighborhood character and historic structures. Likewise, this alternative would not thwart downtown revitalization; rather, the proposed increase in population over the proposed project may foster economic growth in this activity center.

The Expanded RUL Alternative would result in the significant loss of agriculturally productive lands (over 500 acres of vineyards) and farmlands considered prime and important by the State. Consequently, this alternative would not be consistent with the fourth objective.

Expansion of the RUL would increase the housing supply and the opportunity to provide affordable housing, although it is not clear whether more affordable housing would actually be constructed. With the greater number of housing units, the jobs/housing ratio would decline (the third objective) and the community character would tilt further towards that of a bedroom community. This alternative is considered consistent with the fifth objective (i.e., promotion of a sustainable and healthy economy) because it would expand the City's residential base and the number of jobs for residents. Under this alternative, Policy 5a of the Seismic Safety/Safety Element of the existing General Plan is assumed to still apply; therefore, this alternative would be consistent with the seventh objective (i.e., encouragement of appropriate development in the flood hazard areas of the Napa River).

Summary. The loss of agricultural lands, the increased conflict with the County's adopted land use/environmental goals, the uncertain availability of a future, long-term water supply, the increased conflicts with resource values, and the increased exposure to natural and man-made hazards indicate that

the Expanded RUL Alternative is environmentally inferior to the proposed project. Furthermore, this alternative fails to support three of the objectives embodied by the community vision for Napa.

Environmentally Superior Alternative

Based on the above assessment, the proposed project would be the alternative that best reduces environmental impacts and satisfies the community objectives.

Section 6
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APPENDIX E

Chapter 7
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APPENDIX E

Appendix A
Notice of Preparation & Responses

APPENDIX E

MEMORANDUM

DATE: March 15, 1995

TO: State, County, and Local Agencies;
Other Potentially Interested Parties

FROM: Alwin Turiel Kloeb, AICP, General Plan Project Manager

RE: **CITY OF NAPA GENERAL PLAN UPDATE EIR**

CC: Ogden Environmental;
John Yost, Planning Director

The city of Napa is preparing a comprehensive update to its 1982 General Plan. Your agency or group has been identified as a potentially interested entity in relation to the city's environmental impact report (EIR) for the updated General Plan. The General Plan EIR will address potential environmental impacts at the program level.

The attached information is being sent to notify you the city has transmitted a Notice of Preparation to the California Office of Planning and Research in accordance with the California Environmental Quality Act (CEQA). The review period for this phase will end Friday, May 5, 1995.

The city of Napa invites your comments on the scope of the EIR. Questions and comments should be directed to Alwin Turiel Kloeb, AICP, City of Napa Planning Department, PO Box 660, Napa, California 94559-0660.

NOTICE OF PREPARATION

TO: Office of Planning and Research
1400 Tenth Street
Sacramento, California 95814

SUBJECT: Notice of Preparation of a Draft Environmental Impact Report

The city of Napa will be the Lead Agency and will prepare an environmental impact report (EIR) for the project identified below. We need to know the views of your agency as to the scope and content of the environmental information that is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency will need to use the EIR prepared by our agency when considering your permits and other approvals for development that would subsequently occur following the city's adoption of the updated **General Plan.**

The project description, location, and probable environmental effects are contained in the attached summary materials.

Due to time limits mandated by State law, your response must be sent at the earliest possible date, but not later than 45 days after receiving this notice.

Please send your response to Ms. Alwin Turiel Kloeb, AICP, General Plan Project Manger, at PO Box 660, Napa, California 94559. We will need the name and telephone number for a contact person in your agency.

PROJECT TITLE: **General Plan Update**

PROJECT APPLICANT: **City of Napa**

DATE: March 15, 1995 SIGNATURE _____

TITLE: Alwin Turiel Kloeb, Project Manager
TELEPHONE: (707) 257-9530

Reference: California Administrative Code, Title 14 § 15035.7, 15043.3, and 15066.

APPENDIX E

ENVISION NAPA 2020
City of Napa Proposed General Plan Update

BACKGROUND

Since 1975 the city of Napa has controlled population increase by limiting land supply. The primary mechanism for this control has been an urban growth boundary originally named the Residential Urban Limit Line (RUL), and later renamed to Rural Urban Limit. The RUL has been an effective tool in guiding the location and timing of development for nearly two decades, despite shifts in emphasis from the 1975 plan's growth control approach to its 1982 successor's growth management strategy.

The 1982 General Plan incorporated several of the key policies of its 1975 predecessor. The plan envisioned a compact urban area surrounded by a greenbelt of open space and farmlands. The RUL was retained as an integral part of the vision, and a yearly residential permit limitation of 512 units per year was instituted. The yearly building permit limit, which has never been met, was intended to pace the rate of growth so that the city's population would not exceed 75,000 before the turn of the century, while leaving adequate urban land for development beyond 2000.

Infill development was strongly encouraged, on the premise that all available land should be put to maximum use to forestall any need to expand the RUL. Minimum densities were established and maximum densities were raised in a number of areas. It was thought that improving the profit potential of sites (by increasing the number of units that could be sold or rented) would encourage developers to undertake more infill projects. Such development would result in less land being needed to accommodate the population growth allowed by the city's 1982 General Plan.

The city began a comprehensive update of its 1982 General Plan in 1988, after adopting several small scale amendments in the mid-1980's. Background materials were prepared, a Parks and Recreation Master Plan and element was completed, and the housing element was updated. The *Futures Report*, completed in 1990, provides information through 1987 on local and regional growth trends, opportunities and constraints, and key issues. The report also suggests a wide range of potential alternatives for planned change and their respective impacts.

A 19 member citizen's advisory committee (CAC) was appointed in October 1991 to guide city staff in preparation of a *Concept Report*, which forms the philosophical basis for the new General Plan. Following several months of fact finding, the group had distilled its vision of Napa's future and agreed on a series of fundamental goal statements. In March 1992 a residential capacity analysis subcommittee of the CAC was formed to assist city planning staff in developing a method of assessing remaining residential potential within the RUL. At the direction of the CAC, staff prepared a comprehensive analysis of residential potential based on a neighborhood character sensitive methodology developed jointly by staff and the CAC subcommittee. Subcommittee members delineated neighborhood typology areas and staff assessed them for additional development potential. In November 1992 the CAC recommended using the neighborhood sensitive analysis system as a basis for the updated General Plan's residential categories and overall land use approach. A second year of public outreach verified community acceptance of the neighborhood based land use strategy and it was incorporated into the final General Plan *Concept Report*, published in March 1994.

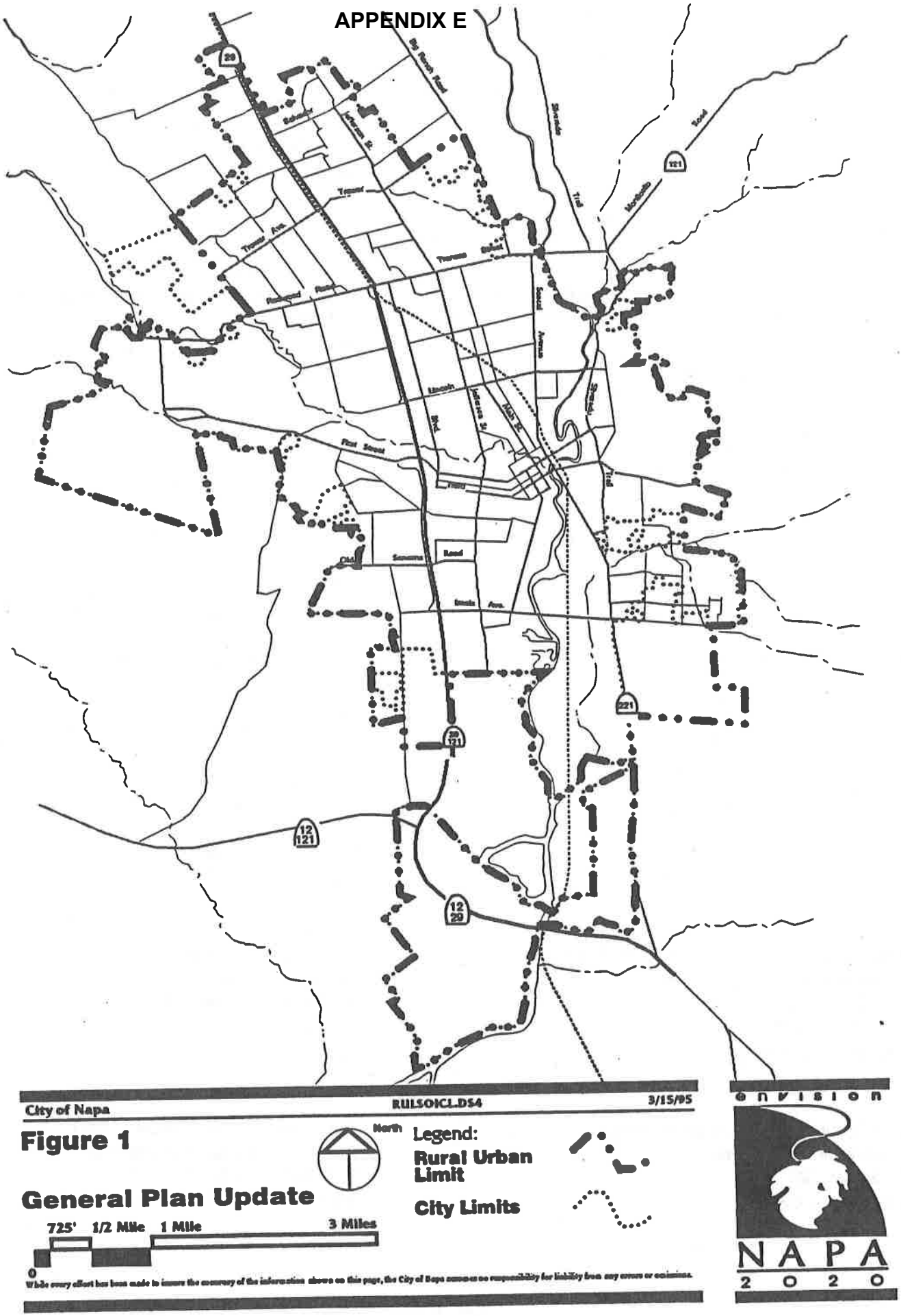
APPENDIX E

PROJECT DESCRIPTION

The city of Napa is preparing an updated General Plan, called *Envision Napa 2020,* to replace the General Plan of 1982, as amended. The city intends to continue to limit future development within the city and its Sphere of Influence to the area within the RUL delineated in the plan update (Figure 1). As part of the planning for this infill process, a five member subcommittee of the CAC identified neighborhoods by type within the city's 12 planning areas. Additional potential for vacant and under developed land was then calculated by city staff based on two land use scenarios called "existing pattern" and "infill pattern." Both patterns are consistent with and retain neighborhood character. The EIR will evaluate the potential effects of the proposed infill pattern, and one alternative to the pattern, focusing on land use potential affected by the proposed Army Corps of Engineers Napa River Flood Control project. The existing 1982 general plan, as amended (i.e., no project) alternative will also be addressed.

PROBABLE ENVIRONMENTAL EFFECTS OF THE PROPOSED PROJECT

Pursuant to CEQA and the CEQA Guidelines, the EIR will describe the existing environmental conditions, analyze the potential effects of implementation of the proposed general plan update on existing environmental conditions, and proposed mitigation measures for identified impacts. As a program EIR, mitigation measures will be incorporated into the updated General Plan through policy statements and implementation measures. Probable environmental effects of *Envision Napa 2020* include the following: (1) traffic/circulation; (2) noise; (3) air quality; (4) jobs/housing balance and regional fair share housing requirements; (5) effects on the Napa River and its tributaries; (6) effects of the Napa River; (7) impacts to sensitive habitats including wetlands; (8) impacts on open space, scenic corridors and view sheds; and (9) impacts to historic and archeological resources.


City of Napa
RULSOICLDS4
3/15/95
Figure 1
General Plan Update
North
Legend:
Rural Urban Limit
City Limits
725'
1/2 Mile
1 Mile
3 Miles
0
While every effort has been made to insure the accuracy of the information shown on this page, the City of Napa assumes no responsibility for liability from any errors or omissions.
envision
NAPA
2020

LIST OF AGENCIES AND GROUPS RECEIVING NOP

APPENDIX E

Office of Planning and Research
1400 Tenth Street, Room 121
Sacramento, CA 95814

County of Napa
Environmental Management
1195 Third Street
Napa, CA 94559

County of Napa
Conservation, Redevelopment and Planning Department
1195 Third Street, Room 210
Napa, CA 94559

County of Napa
Flood Control & Water Conservation District
1195 Third Street
Napa, CA 94559

California Native Plant Society
909 12th Street
Sacramento, CA 95814

Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94101

Association of Bay Area Governments (ABAG)
P. O. Box 2050
Oakland, CA 94604-2050

Metropolitan Transportation Commission
Joseph P. Bort Metro Center
101 Eighth Street
Oakland, CA 94607-4700

Department of Water Resources
1416 Ninth Street, Room 449
Sacramento, CA 95814

Department of Fish and Game
District 3 Office
P. O. Box 47
Yountville, CA 94559

Wade Greene, Senior Transportation Planner
Transportation Planning Branch
Caltrans, District 4
P. O. Box 23660
Oakland, CA 94623-0660

Regional Water Quality Control Board
San Francisco Bay Region (2)
2101 Webster, Suite 500
Oakland, CA 94612

State Water Resources Control Board
Division of Water Quality
P. O. Box 100
Sacramento, CA 95814

Napa Valley Unified School District
Attention: Michael G. Dencavage
2425 Jefferson Street
Napa, CA 94558

APPENDIX E

Napa Sanitation District
P. O. Box 2480
Napa, CA 94559

Army Corps of Engineers
Attention: Regulatory Branch
211 Main Street
San Francisco, CA 94105

City of American Canyon
Planning Department
2185 Elliott Drive
American Canyon, CA 94590

Town of Yountville
Planning Department
6550 Yount
Yountville, CA 94515

Local Agency Formation Commission
Attention: Charlie Wilson
1195 Third Street
Napa, CA 94559

Pacific Gas and Electric Company
300 Burnell Street
Napa, CA 94559

Office of Historic Preservation
P.O. Box 942896
Sacramento, CA 94296-0001

Department of Boating and Waterways
1629 S. Street
Sacramento, CA 95814

John Ponte
Congestion Management Agency
Napa County
1195 Third Street
Napa, CA 94559

Ron Swim
Napans for Balance
3352 Sunview Drive
Napa, California 94558

Charlene Toledo
The Suscol Council
PO Box 5386
Napa, CA 94559

David Briggs
Napa Valley Sierra Club
1010 Alabama Street
Napa, CA 94558

Napa Valley Economic Development Corporation
Attn: Angie Pieper
1091 5th Street
Napa, CA 94559

Napa Valley Family Homes
Attn: Grania Lindberg
1110 Adams Street
St. Helena, CA 94574

Jeanne Munoz, Senior Project Manager
OGDEN Environmental and Energy Services
221 Main Street, Suite 1400
San Francisco, CA 94105

Napa County Landmarks
Attn: John Whitridge
1026 First Street
Napa, CA 94558

Napa County Land Trust
1040 Main Street
Napa, CA 94558

a:GP_NOP.lst

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY PETE WILSON, Governor

DEPARTMENT OF TRANSPORTATION
BOX 23660
OAKLAND, CA 94623-0660
(510) 286-4444
TDD (510) 286-4454

March 21, 1995

Napa-General
NAP000037



Ms. Alwin Turiel Kloeb, AICP
City of Napa Planning Department
P. O. Box 660
Napa, CA 94559-0660

Re: Notice of Preparation: EIR FOR UPDATED COMPREHENSIVE GENERAL PLAN FOR THE CITY OF NAPA (ENVISION NAPA 2020).

Dear Ms. Kloeb:

Thank you for including the California Department of Transportation (Caltrans) in the early environmental review process for this project. We generally concur with the proposed scope of information to be addressed in the General Plan update and/or its environmental impact report (EIR). In terms of transportation elements, we offer the following suggestions:

Growth Alternatives and Timing of Infrastructure Improvements:

The general plan, as a concept document, must provide a framework upon which the impacts of future proposals can be measured and evaluated. It provides the City an opportunity to explore relationships between alternative growth scenarios, projected traffic generation and the cost and timing of needed circulation improvements for each phase (to build out). The discussion of potential mitigation measures to address the impacts of general plan growth scenarios should include, but not be limited to, the areas of financing, scheduling, implementation responsibilities and lead agency monitoring.

Linkage Between Land Use and Transportation – Traffic Impacts:

All land use changes described in the general plan should be accompanied by new trip generation rates, distribution percentages and assignment volumes. The year and source of traffic counts and volumes should be provided. Information should be shown on traffic diagrams that depict accurate circulation patterns and represent local streets, main arterials and all State facilities. Caltrans is primarily interested in impacts to State routes. AM and PM peak hour volumes and Average Daily Traffic (ADT) for weekdays and weekends should be included for both existing traffic and existing traffic plus traffic projected from the proposed land use changes.

Transportation Management Strategies:

The general plan should discuss the development of citywide Transportation System Management (TSM) and Transportation Demand Management (TDM) plans. The plans should define trip reduction and carpooling/vanpooling goals. Provisions for park and ride lots should be detailed. Accurate commuter information must be supplied in order to develop effective programs which are successful in reducing the demand for new transportation facilities.

Bicycle and pedestrian circulation and amenities should be discussed. Measures to encourage the use of transit options should be included.

We suggest that a discussion of strategies to achieve a job/housing balance be included. The discussion should go beyond a detailing of the number of units to number of jobs; it should examine the match of incomes to housing pricing. A supply of affordable housing for local workers reduces the need for long commutes. Caltrans considers this to be a trip reduction strategy.

Public/Private Sector Cooperation:

Guidelines should be developed within the general plan to encourage the participation of project proponents in the development and maintenance of an efficient transportation system. Joint impact mitigation measures and funding mechanisms, such as assessment districts, impact fees and right-of-way dedication, should be devised to fairly assess each project's responsibility.

Air Quality:

Air quality concerns should be fully addressed. Some communities have chosen to create separate air quality elements, while others have included this discussion in a conservation element.

We look forward to reviewing the EIR for the general plan. We expect to receive a copy from the State Clearinghouse, but to expedite our review you may send two copies in advance to:

Office of Transportation Planning
IGR/CEQA Branch
Caltrans, District 4
P. O. Box 23660
Oakland, CA 94623-0660

Should you have any questions concerning our comments, please call Timothy Sable of my staff at (510) 286-5555.

Sincerely,

JOE BROWNE
District Director

by: Phillip Badal

PHILLIP BADAL
District Branch Chief
IGR/CEQA

cc: Michael Chiriatti, SCH
Patricia Perry, ABAG
Craig Goldblatt, MTC

STATE OF CALIFORNIA - CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY PETE WILSON, Governor

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION
2101 WEBSTER STREET, Suite 500
OAKLAND, CA 94612
Tel: (510) 286-1255
FAX: (510) 286-1380
BBS: (510) 286-0404

May 4, 1995
File No. 2138.04 (LCF)

Alwin Turiel Kloeb
City of Napa
PO Box 660
Napa, CA 94559

Re: General Plan Update

Dear Ms. Kloeb:

We have received your Notice of Preparation of a Draft Environmental Impact Report for the City of Napa General Plan. You have requested comments on the scope of the EIR. The following is a list of potential impacts which are germane to the RWQCBs statutory responsibilities:

1. Water quality impacts associated with increased sewage production due to population growth. It is important to identify alternatives to increased discharges to the Napa River (ie. increased reclamation through agricultural and landscaping uses).

2. Impact of increased water demand on Napa River and tributaries, and groundwater.

3. Water quality impacts associated with an increase in stormwater pollutants. To sufficiently address this potential impact the City of Napa needs to develop an urban runoff control program. The City has previously been required to develop such a program by the RWQCB as discussed below.

   The City of Napa was notified by letter February 11, 1992 of the requirements and timelines set forth in the RWQCB Basin Plan formalizing an Urban Runoff Management Program. The Basin Plan requires that all local agencies in Napa County which own or have responsibility for storm drain systems develop a baseline program to prevent the increase in pollutants in discharges from these systems. This includes the following:

   "Ordinances or other means of requiring the control of runoff from new development and significant redevelopment both during construction and after construction is completed."

   The 2/11/92 letter directed the City to review and revise the planning procedures and develop or revise comprehensive master plans to assure that

increases in pollutant loading associated with newly developed and significantly redeveloped areas are, to the maximum extent practicable, limited (see attached 2/11/92 letter for complete list of program elements).

4. Impacts associated with the loss of sensitive habitats and open space:

   - wetlands
   - Riparian zones
   - open space with vegetated cover (provides pollutant removal and groundwater infiltration).

   Numerous municipalities throughout the country have been developing watershed protection plans. An integral component of these plans is the systematic identification of the existing natural resources and sensitive habitats, and subsequent plans to protect those areas determined to have the highest value.

5. Impacts of increased development on flood control in the absence of the proposed Amy Corps of Engineers Flood Control Project, or in areas not affected by this project. It is important to develop an environmentally sensitive flood control program which maintains the integrity of the creeks and other waterways.

If you have any questions, please contact me at 510-286-0428.

Sincerely,

Leslie C. Ferguson

Leslie C. Ferguson
Water Resources Control Engineer
Watershed Management Division

MTC
METROPOLITAN TRANSPORTATION COMMISSION

DIANNE MCKENNA, CHAIR
Association of Bay Area Governments

JAMES SPERING, VICE CHAIR
Solano County and Cities

ABT AGNOS
U.S. Department of Housing and Urban Development

JANE BAKER
Cities of San Mateo County

JAMES T. BEALL JR.
Santa Clara County

SHARON BROWN
Cities of Contra Costa County

JOE BROWNE
State Business Transportation and Housing Agency

EDWARD R. CAMPBELL
Alameda County

WILLIAM P. DUPLISSEA
U.S. Department of Transportation

MARY GRIFFIN
San Mateo County

ELIHU HARRIS
Cities of Alameda County

TOM HSIEH
City and County of San Francisco

JEAN MCCOWN
Cities of Santa Clara County

FRED NEGRI
Napa County and Cities

JON RUBIN
San Francisco Mayor's Appointee

ANGELO J. SIRACUSA
San Francisco Bay Conservation and Development Commission

TOM TORLAKSON
Contra Costa County

DOUG WILSON
Marin County and Cities

SHARON WRIGHT
Sonoma County and Cities

LAWRENCE D. DAHMS
Executive Director

WILLIAM F. HEIN
Deputy Executive Director

May 5, 1995

Alwin Turiel Kloeb
General Plan Project Manager
Planning Department
City of Napa
1600 First Street
PO Box 660
Napa, CA 94559-0660

Re: Notice of Preparation: City of Napa General Plan Update EIR

Dear Ms. Kloeb:

This letter contains Metropolitan Transportation Commission (MTC) staff recommendations of the transportation system impact analysis that should be included in the EIR for the City of Napa General Plan Update. The proposed general plan would guide future development in the City of Napa through 2020. The plan includes a buildout population and employment potential of 11,500 new residents, 4,650 new residential units, and 11,480 new jobs. The plan also continues the use of a rural urban limit and greenbelt concept in combination to "contain" the city's urban expansion.

Please clearly document your traffic analyses in the DEIR. In particular, document impacts, if any, to the Metropolitan Transportation System (MTS) in Napa County. Enclosed with this letter are two maps that show the Napa County MTS. Assumptions for transportation projects in the DEIR should include only projects that are identified in the 1994 Regional Transportation Plan.

We look forward to reviewing the Draft EIR. If we can be of any assistance, please do not hesitate to call.

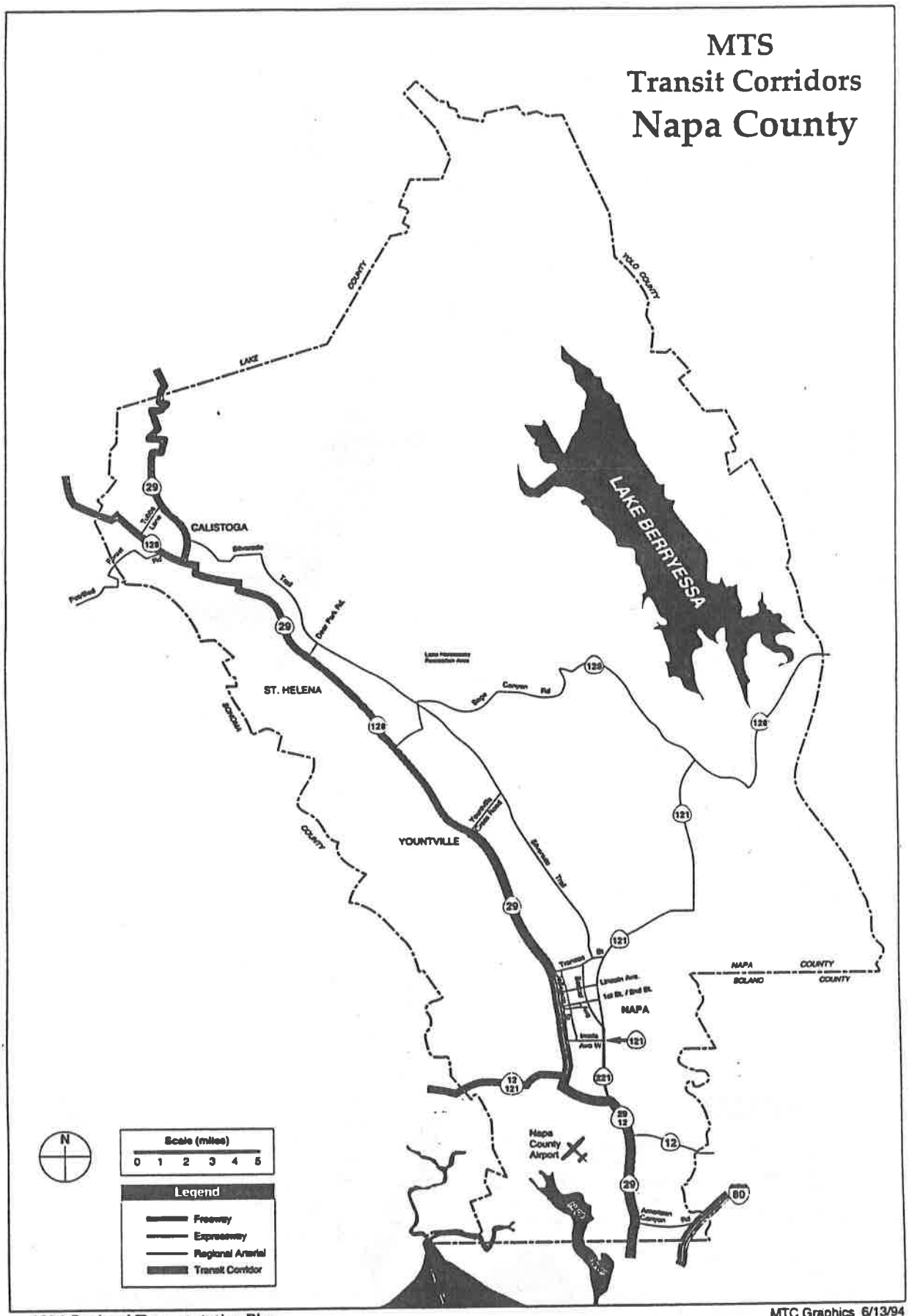
Sincerely,

Michelle Morris

Michelle Morris
Transportation Planner

cc: Craig Goldblatt, MTC

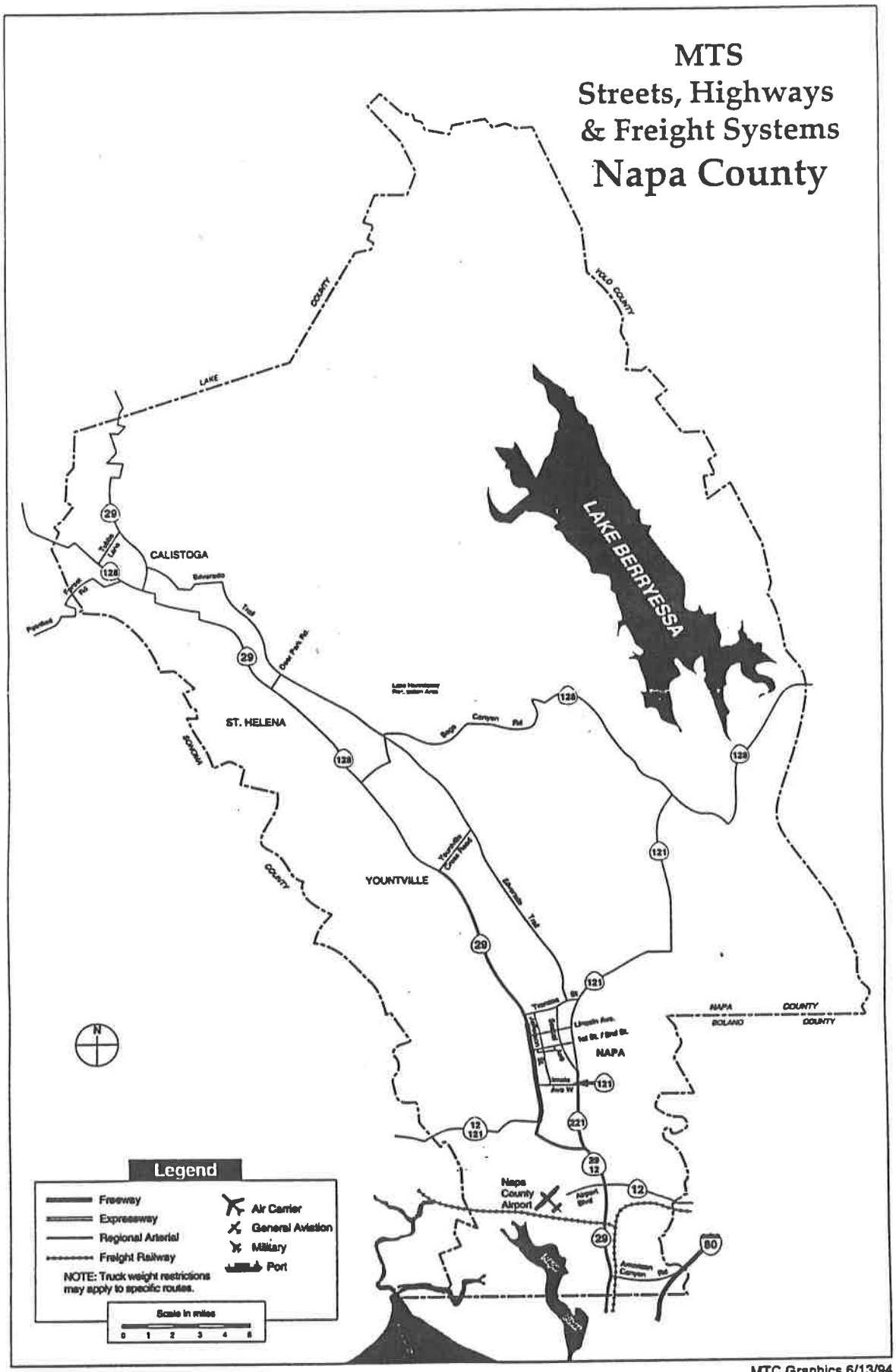
JOSEPH P. BORT METROCENTER • 101 EIGHTH STREET • OAKLAND, CA 94607-4700
510/464-7700 • TDD/TTY 510/464-7769 • FAX 510/464-7848



1994 *Regional Transportation Plan*

MTC Graphics 6/13/94

B-16



1994 *Regional Transportation Plan*

B-17

MTC Graphics 6/13/94

Appendix B
Policy Resolution No. 27 – Standard Mitigation Measures and Conditions of Approval

APPENDIX E

APPENDIX E

POLICY RESOLUTION NO. 27

A POLICY RESOLUTION OF THE CITY COUNCIL OF THE CITY OF NAPA, STATE OF CALIFORNIA ESTABLISHING STANDARD MITIGATION MEASURES AND CONDITIONS OF APPROVAL FOR ALL DEVELOPMENT PROJECTS WITHIN THE CITY OF NAPA

WHEREAS, Section 15.50.010 of the Napa Municipal Code provides that the City Council by resolution may establish standard mitigation measures and conditions of approval which, upon adoption, shall be deemed imposed on all applicable development projects within the City of Napa; and

NOW THEREFORE, BE IT RESOLVED by the City Council of the City of Napa, State of California, as follows:

Section 1: That Policy Resolution No. 27 as adopted on August 4, 1992 is hereby amended.

Section 2: The City Council does hereby adopt the mitigation measures set forth on the attached Attachment A, as the City of Napa Standard Mitigation Measures. Unless otherwise authorized by the City for a specific project, these mitigation measures are (a) hereby imposed on every development project approved by the City of Napa for which an Environmental Impact Report is prepared, and (b) shall be included in project plans or proposals made by or agreed to by an applicant before a Negative Declaration may be released for public review.

Section 3: The City Council does hereby adopt the standard conditions of approval set forth on Attachment B, as the City of Napa Standard Project Conditions. Unless otherwise provided in a specific project approval, these conditions are hereby imposed on each applicable development project hereafter approved or deemed approved in the City of Napa.

I HEREBY CERTIFY that the foregoing resolution was duly and regularly adopted by the City Council of the City of Napa at a regular meeting of said City Council of the City of Napa at a regular meeting of said City Council held of the 21st day of November, 1995, by the following roll call vote:

Ayes: Wagenknecht, Watter, Busenbark, Martin and Solomon

Noes: None

Absent: None

ATTEST: Pamela Allen
CITY CLERK OF THE CITY OF NAPA

Editor's Notes:		
	Adopted	08/04/92
	Amended	09/20/94
	Amended	09/19/95
	Amended	11/21/95 - Commercial construction debris

APPENDIX E

CITY OF NAPA
POLICY RESOLUTION NO. 27

ATTACHMENT A
STANDARD MITIGATION MEASURES

EARTH

1. All Project-related grading, trenching, backfilling, and compaction operations shall be conducted in accordance with the City of Napa Public Works Department Standard Specifications (hereinafter referred to as PWD Standard Specifications).

2. All construction activities shall meet the Uniform Building Code regulations for seismic safety (i.e., reinforcing perimeter and/or load bearing walls, bracing parapets, etc.).

3. All construction activities shall be performed in a manner that minimizes, to the maximum extent practicable, any pollutants entering directly or indirectly the storm water system or ground water.

4. If any grading or excavation activities will be performed between October 15 through April 1, the Developer shall provide an erosion and sediment control plan and a schedule for implementation of approved measures to the Public Works Director for approval. No such grading and excavation shall be performed except in accordance with the approved plan and schedule.

5. Hydroseeding of all disturbed slopes shall be completed by November 1.

6. For all subdivisions and parcel maps, the Developer shall prepare Soils Investigation/Geotechnical Report in accordance with Section 16.36.200 of the NMC. It shall be submitted to the Public Works Director for review and determination of adequacy before approval of the parcel or final map. The improvement plans shall incorporate all design and construction criteria specified in the report. The geotechnical engineer shall sign the improvement plans and approve them as conforming to their recommendations prior to final map approval. The geotechnical engineer shall also assume responsibility for inspection of the work and shall certify to the City, prior to acceptance of the work, that the work performed is adequate and complies with their recommendations. Additional soils information may be required by the Chief Building Inspector during the plan check of individual house plans in accordance with Title 15 of the NMC.

AIR

1. Grading and construction equipment shall be shut down when not in use.

2. Construction activities shall not occur during windy periods.

3. Exposed soil surfaces shall be periodically sprinkled to retard dust; no City water shall be used for this purpose.

WATER

1. To insure adequate drainage control, the Developer of any project which introduces new impervious surfaces (roof, driveways, patios) which will change the rate of absorption of drainage or surface run-off shall submit a drainage and grading plan designed in accordance with the City of Napa Public Works Department Standard Specifications to the Public Works Department for its approval.

2. If the project is in the Flood Hazard or Floodway Areas of the Napa River or its tributaries, Developer shall submit Certifications of Compliance by a registered architect or civil engineer required by NMC Chapter 17.62 to the Public Works Department at the times set forth in Chapter 17.62.

3. Side yards of each lot shall have of a minimum unobstructed width of five (5) feet. No building encroachments, door landings or mechanical equipment shall be placed in this unobstructed area without the review and approval of the Public Works Director in order to assure adequate drainage.

4. For any construction activity that results in the disturbance of five (5) acres or greater total land area, or is part of a larger common plan of development that disturbs five (5) acres or greater total land area, Developer shall obtain all required permits from the California Regional Water Quality Control Board prior to any grading or construction activity.

5. The Developer shall ensure that no construction materials (e.g., cleaning fresh concrete from equipment) are conveyed into the storm drain system.

6. All materials that could cause water pollution (i.e., motor oil, fuels, paints, etc.) shall be stored and used in a manner that will not cause any pollution. All discarded material and any accidental spills shall be removed and disposed of at an approved disposal site.

7. The Developer of an industrial facility shall obtain a NPDES permit from the State Water Resources Control Board prior to establishment of the use.

8. All faucets in sinks and lavatories shall be equipped with faucet aerators designed to limit the maximum flow to two and two tenths (2.2) gallons per minute.

9. All shower heads shall be of a design to limit the maximum flow to two and one-half (2.5) gallons per minute.

10. The Developer shall completely offset the water requirements of this project by complying with the retrofit requirements of Ordinance No. O93-010.

NOISE

1. Construction activities shall be limited to specific times pursuant to NMC 8.08.025 which limits construction activities to 7:00 a.m. to 7:00 p.m., Monday through Friday and 8:00 a.m. to 4:00 p.m. on weekends or legal holidays, unless a permit is first secured from the City Manager (or his/her designee) for additional hours. The ordinance further states that there will be: no start up of machines nor equipment prior to 8:00 a.m., Monday through Friday; no delivery of

materials nor equipment prior to 7:30 a.m. nor past 5:00 p.m., Monday through Friday; no cleaning of machines nor equipment past 6:00 p.m., Monday through Friday; no servicing of equipment past 6:45 p.m., Monday through Friday.

2. Construction equipment must have state-of-the-art muffler systems required by current law. Muffler systems shall be properly maintained.

3. Noisy stationary construction equipment, such as compressors, shall be place away from developed areas off-site and/or provided with acoustical shielding.

4. Grading and construction equipment shall be shut down when not in use.

LIGHT & GLARE

1. All new lighting shall be shielded to avoid glare and directed onto the project site and access ways.

2. Low-level lighting shall be utilized in any parking area(s) as opposed to elevated high-intensity light standards.

VISUAL

1. All new utilities shall be placed underground.

2. The Developer shall:

   (a) Submit to and receive approval by the Planning Department of a Landscape and Irrigation Plan designed and signed by a licensed landscape architect or landscape contractor prior to the issuance of a building permit, commencement of use, or approval of a final or parcel map. The plan shall conform to the City of Napa's Water Efficient Landscape Guidelines. A final fencing and lighting plan may be included or submitted separately.

   (b) Install or execute the City's Installation Agreement, including appropriate security, for the landscaping and irrigation.

   (c) Prior to initial occupancy and the release of installation security, the licensed professional who signed the final landscape and irrigation plans (and final fencing and lighting plans if included) shall certify in writing to the Planning Director that he or she has inspected and approved and installation of the landscaping and irrigation (and fencing and lighting if included) and found them to be consistent with the approved plan and that the systems are in working order.

   (d) Prior to occupancy, the Developer shall execute and record the City's Landscape Maintenance Agreement.

3. The Developer shall secure separate architectural review approval for any signage for the project.

TRANSPORTATION/CIRCULATION

1. All required public frontage and street improvements shall be designed and built in accordance with City of Napa ordinances and the PWD Standard Specifications.

2. During non-working hours, open trenches shall be provided with appropriate signage, flashers, and barricades approved by the Street Superintendent to warn oncoming motorists, bicyclists, and pedestrians of potential safety hazards.

3. All road surfaces shall be restored to pre-project conditions after completion of any project-related pipeline installation activities.

4. Any pedestrian access through and/or adjacent to the project site shall remain unobstructed during project construction or an alternate route established as approved by the Police Chief and Public Works Director.

5. In order to mitigate the cumulative impact of the traffic generated by the subject project on the City's arterial and collective street system, the Developer shall pay a Street Improvement Fee in accordance with Ordinance No. 4127 and Resolution 89-362 to pay for the traffic improvements identified therein. Such fee shall be payable at the rate in effect at the time of payment. The findings set forth in the ordinance and resolution are incorporated herein. The City further finds that the calculation of the fees in accordance with the trip generation capacity of development demonstrates there is a reasonable relationship between the amount of the fees imposed and the cost of the street improvements attributable to this project.

PUBLIC SERVICES/SCHOOLS

1. Developer shall comply with all applicable requirements of the Uniform Fire Code the Fire Department and PWD Standard Specifications and the Fire Department "Standard Requirements for Commercial/Residential Projects," including, without limitation, the requirements for access, new construction, smoke detectors, fire extinguishers, fire hydrants, etc. Existing fire hydrants may be used to meet hydrant location requirements only if they meet or are changed to meet current hydrant specifications.

2. Properties having common ownership shall provide the Fire Department with a notarized copy of the recorded conditions, covenants, and restrictions agreement in a form satisfactory to the City Attorney ensuring that all components of fire protection system(s), and fire access roads will be maintained by a maintenance district, owner's association, or similar legally responsible entity.

3. All newly constructed buildings must have automatic sprinkler systems conforming to NFPA and City Standard Specifications, for which installation permit must be obtained from Fire Prevention. In multi-building complexes, or in buildings with three (3) or more stories, special monitoring conditions will be required. Existing habitable buildings which are retained shall be retrofitted.

4. The Developer of any project proposing a change in occupancy use classification (as defined in the Uniform Building Code Table 5A) in a building protected by automatic fire sprinklers shall have the sprinkler system evaluated by a licensed fire sprinkler contractor or fire protection engineer for compliance with National Fire Protection Association Installation Standards. A written report of the inspection findings shall be submitted to the Fire Department prior to final

occupancy clearance. A permit is required from Fire Prevention for sprinkler system alterations.

5. The Developer of any project which proposes commercial occupancies shall secure approval from Fire Prevention and Building Departments prior to signing lease agreements and allowing occupancy of prospective occupants that pose possible fire and life safety hazards, or are classified, or are classified by the Uniform Building Code as an H (hazardous) occupancy.

   Examples of these types of occupancies are: Storage of flammable, combustible, explosive, or toxic materials, manufacturing processes involving the above, woodworking shops, fire rebuilding or storage, automotive repair, auto body repair and/or painting, factories where loose combustible fibers are present, semi-conductor fabrication facilities, bulk paint storage, etc.

6. Developer shall pay the required fire and paramedic fees for new development in accordance with Napa Municipal Code Chapter 15.78. Such fees shall be payable at the rate in effect at the time of payment for the unit involved. The findings set forth in such chapter and Resolution 94-106 are incorporated herein. The City further finds that calculation of the fee pursuant to the formula set forth therein demonstrates that there is a reasonable relationship between the fees imposed and the cost of improvements attributable to this project.

7. During the construction/demolition/renovation period of the project, Developer shall use the franchised garbage hauler for the service area in which the project is located to remove all wastes generated during project development, unless Developer transports project waste. If the Developer transports the project's waste, Developer must use the appropriate landfill for the service area in which the project is located.

8. Developer shall provide for the source separation of wood waste for recycling. Developer shall use the franchised garbage hauler for the service area in which located for collection of such wood waste, unless the Developer transports such wood waste to a location where wood waste is recycled.

9. The Developer of a commercial, industrial or multi-family project with common waste disposal facilities shall submit to and receive approval from the Public Works Director of a source reduction plan which meets the City's Source Reduction and Recycling Element and implementing guidelines.

10. A recycling/solid waste enclosure shall be provided in accordance with Chapter 17.102, et seq. of the NMC for all commercial, industrial and multi-family projects with common solid waste facilities.

11. Developer shall pay the required fees for each new dwelling unit in accordance with the Napa Municipal Code Chapter 15.68. Such fee shall be payable at the rate in effect at the time of payment for the unit involved. The findings set forth in such chapter and Resolution 92-084 are incorporated herein. The City further finds that calculation of the fee due pursuant to the formula set forth in Section 15.68.040 of the Napa Municipal Code demonstrates that there is a reasonable relationship between the fees imposed and the cost of the improvements attributable to this project.

12. Unless project approval requires only land dedication, the Developer shall pay in-lieu park dedication fee(s) in accordance with and for the purposes of NMC Sections 16.32.040, 15.68.010 and 15.68.090 for each residential unit authorized or allowed by project approval. Such fee(s)

shall be payable at the rate in effect at time of payment. The findings set forth in those sections and in Resolution 92-084 are incorporated herein. The City further finds that the calculation of fees in accordance with the formula set forth in NMC Section 16.32.040D demonstrates that there is a reasonable relationship between the amount of fees imposed and the costs of acquisition attributable to this project.

UTILITIES

1. Prior to trenching within existing roadway areas, the Developer's engineer shall ascertain the location of all underground utility systems and shall design any proposed subsurface utility extensions to avoid disrupting the services of such systems.

2. Water and energy conservation measures shall be incorporated into project design and construction in accordance with applicable codes and ordinances.

3. The project shall be connected to the Napa Sanitation District for sanitary sewer service. If the subject property is presently served by individual sewage disposal systems, the septic systems, set backs, and reserve areas must be protected and maintained during cleaning, grading, construction, and after connection to the District, the existing septic tank(s) shall be properly destroyed.

4. The project shall be connected to the City of Napa water system. Any existing well must be properly protected from potential contamination. If an existing well is to be destroyed, a well-destruction permit must be obtained from the Napa County Department of Environmental Management by a licensed well driller. If an existing well is not destroyed, it must be properly protected and an approved backflow prevention device installed according to the Water District's specifications.

5. The project shall be designed and built in accordance with the PWD Standard Specification regarding the adequate conveyance of storm waters.

ARCHEOLOGICAL/HISTORICAL/CULTURAL

1. If any archeological materials or objects are unearthed during project construction, all work in the vicinity shall be immediately halted until a qualified archeologist is retained by the City to evaluate the finds. Developer shall comply with all mitigation recommendations of the archeologist prior to commencing work in the vicinity of the archeological finds.

BUILDING

1. Developer shall comply with all requirements of federal, state, and local laws applicable to project construction and issuance of building permits.

IMPLEMENTATION

1. Developer shall comply with the monitoring/reporting check lists development pursuant to the

City of Napa Resolution 90-108 regarding CEQA implementation procedures for both standard and project specific mitigation measures.

2. Unless otherwise provided, all measures included in project approval pursuant to NMC Chapter 17.60 (CR suffix and flood evacuation) shall be installed or carried out prior to final clearance of the building permit or concurrently with the installation of site improvements in the case of a subdivision map.

3. Developer shall notify all employees and agents of the mitigation measures and conditions applicable to the project and shall ensure compliance with such measures and conditions. Developer shall also notify all assigns and transfers of the same.

MONITORING & REPORTING PLAN FOR STANDARD MITIGATION MEASURES*

	MITIGATION MEASURE		METHOD OF MONITORING/REPORTING	VERIFYING DEPT.		TIME OF COMPLIANCE	INT. DATE
EARTH							
1.	All Project-related grading, trenching, backfilling, and compaction operations shall be conducted in accordance with the City of Napa Public Works Department Standard Specifications (hereinafter referred to as PWD Standard Specifications).	(a)	City shall review and approve grading and drainage plan prior to issuance of Building Permit	Public Works (Eng)	(a)	Building Permit Issuance	
		(b)	City shall inspect construction activities.	Public Works (Eng)	(b)	Project Constr.	
2.	All construction activities shall meet the Uniform Building Code regulations for seismic safety (i.e., reinforcing perimeter and/or load bearing walls, bracing parapets, etc.	(a)	City shall review and approve plans prior to issuance of Building Permit.	Building	(a)	Building Permit Issuance	
		(b)	City shall inspect construction.	Building	(b)	Project Constr.	
3.	All construction activities shall be performed in a manner that minimizes, to the maximum extent practicable, any pollutants entering directly or indirectly the storm water system or ground water.	(a)	Developer shall submit copies of all required permits to City prior to issuance of Building Permit.	Public Works	(a)	Building Permit Issuance	
		(b)	City shall inspect construction activities.	Public Works (Eng)	(b)	Project Constr.	
4.	If any grading or excavation activities will be performed between October 15 through April 1, the Developer shall provide an erosion and sediment control plan and a schedule for implementation of approved measures to the Public Works Director for approval. No such grading and excavation shall be performed except in accordance with the approved plan and schedule.	(a)	City shall review and approve erosion control plan and implementation schedule.	Public Works (Eng)	(a)	Building Permit Issuance	
		(b)	City shall inspect grading and excavation.	Public Works (Eng)	(b)	Project Constr.	

	MITIGATION MEASURE	METHOD OF MONITORING/REPORTING	VERIFYING DEPT.	TIME OF COMPLIANCE	INT. DATE
5.	Hydroseeding of all disturbed slopes shall be completed by November 1.	City shall inspect.	Public Works (Eng)	Project Constr.	
6.	For all subdivisions and parcel maps, the Developer shall prepare Soils Investigation/Geotechnical Report in accordance with Section 16.36.200 of the NMC. It shall be submitted to the Public Works Director for review and determination of adequacy before approval of the Parcel or Final Map. The improvement plans shall incorporate all design and construction criteria specified in the report. The geotechnical engineer shall sign the improvement plans and approve them as conforming to their recommendations prior to Final Map approval. The geotechnical engineer shall also assume responsibility for inspection of the work and shall certify to the City, prior to acceptance of the work, that the work performed is adequate and complies with their recommendations. Additional soils information may be required by the Chief Building Inspector during the plan check of the individual house plans in accordance with Title 15 of the NMC.	(a) City shall review and approve soils investigation/geotechnical report (b) City shall not approve improvement plans until certified by geotechnical engineer. (c) Engineer shall submit certification to City. (d) City shall review and delineate additional requirements during plan check.	Public Works (Eng) Public Works (Eng) Public Works (Eng) Public Works (Bldg)	(a) Parcel/ Final Map Approval (b) Approval of inspection plans (c) Project Acceptance (d) Building Permit Issuance	
AIR					
1.	Grading and construction equipment shall be shut down when not in use.	City shall inspect construction activities.	Public Works (Eng)	Project Constr.	
2.	Construction activities shall not occur during windy periods.	City shall inspect construction activities.	Public Works (Eng)	Project Constr.	
3.	Exposed soil surfaces shall be periodically sprinkled to retard dust; no city water shall be used for this purpose.	City shall inspect construction activities.	Public Works (Eng)	Project Constr.	

	MITIGATION MEASURE	METHOD OF MONITORING/REPORTING	VERIFYING DEPT.	TIME OF COMPLIANCE	INT. DATE
WATER					
1.	To insure adequate drainage control, the Developer of any project which introduces new impervious surfaces (roof, driveways, patios) which will change the rate of absorption of drainage or surface run-off shall submit a drainage and grading plan designed in accordance with the City of Napa Public Works Department Standard Specifications to the Public Works Department for its approval. All construction work shall be in accordance with the approved plans.	(a) City shall review and approve plan. (b) City shall inspect construction.	Public Works (Eng) Public Works (Eng)	(a) Building Permit Issuance (b) Project Constr.	
2.	If the project is in the Flood Hazard or Floodway Areas of the Napa River or its tributaries, Developer shall submit Certifications of Compliance by a registered architect or civil engineer required by NMC Chapter 17.62 to the Public Works Department at the times set forth in Chapter 17.62.	(a) City shall review certifications prior to approval of any Final Map. (b) City shall review certifications prior to occupancy.	Public Works (Eng) Building	(a) Final Map Approval (b) Cert. of Occupancy	
3.	Side yards of each lot shall have of a minimum unobstructed width of five (5) feet. No building encroachments, door landings or mechanical equipment shall be placed in this unobstructed area without the review and approval of the Public Works Director.	City shall inspect for compliance.	Public Works (Eng)	Cert. of Occupancy	
4.	For any construction activity that results in the disturbance of five (5) acres or greater total land area, or is part of a larger common plan of development that disturbs five (5) acres or greater total land area, Developer shall obtain all required permits from the California Regional Water Quality Control Board prior to any grading or construction activity.	(a) Developer shall submit copy of NOI prior to approval of Final Map or other discretionary permit. (b) Developer shall submit copy of permit(s) prior to issuance of grading permit.	Public Works (Eng) Building	(a) Final Map Approval or other Discretionary Approval (b) Grading Permit Issuance	
5.	Developer shall ensure that no construction materials (e.g., cleaning fresh concrete from equipment) are conveyed into the storm drain system.	City shall inspect construction activities.	Public Works	Project Constr.	

	MITIGATION MEASURE	METHOD OF MONITORING/REPORTING	VERIFYING DEPT.	TIME OF COMPLIANCE	INT. DATE
6.	All materials that could cause water pollution (i.e., motor oil, fuels, paints, etc.) shall be stored and used in a manner that will not cause any pollution. All discarded material and any accidental spills shall be removed and disposed of at an approved disposal site.	City shall inspect for compliance.	Public Works	Project Constr.	
7.	The Developer of an industrial facility shall obtain a NPDES permit from the State Water Resources Control Board prior to establishment of the use.	Developer shall submit copy of permit prior to issuance of Building Permit or establishment of use.	Public Works	Building Permit Issuance	
8.	All faucets in sinks and lavatories shall be equipped with faucet aerators designed to limit the maximum flow to two and two tenths (2.2) gallons per minute.	City shall inspect for compliance.	Building	Cert. of Occupancy	
9.	All shower heads shall be of a design to limit the maximum flow to two and one-half (2.5) gallons per minute.	City shall inspect for compliance.	Building	Cert. of Occupancy	
10.	The Developer shall completely offset the water requirements of this project by complying with the retrofit requirements of Ordinance No. 093-010.	Developer shall submit Cert. of Compliance and City shall inspect for compliance.	Public Works (Wtr)	Cert. of Occupancy	
NOISE					
1.	Construction activities shall be limited to specific times pursuant to NMC 8.08.025 which limits construction activities to 7:00 a.m. to 7:00 p.m., Monday through Friday and 8:00 a.m. to 4:00 p.m. on weekends or legal holidays, unless a permit is first secured from the City Manager (or his/her designee) for additional hours. The ordinance further states that there will be: no start up of machines nor equipment prior to 8:00 a.m., Monday through Friday; no delivery of materials nor equipment prior to 7:30 a.m. nor past 5:00 p.m., Monday through Friday; no cleaning of machines nor equipment past 6:00 p.m., Monday through Friday; no servicing of equipment past 6:45 p.m., Monday through Friday.	(a) Developer shall post on-site notice of times for construction. (b) City shall inspect for compliance.	Public Works (Eng) Public Works (Eng)	(a) Project Constr. (b) Project Constr.	
2.	Construction equipment must have state-of-the-art muffler systems required by current law. Muffler systems shall be properly maintained.	City shall inspect construction equipment.	Public Works (Eng)	Project Constr.	

MITIGATION MEASURE	METHOD OF MONITORING/REPORTING	VERIFYING DEPT.	TIME OF COMPLIANCE	INT. DATE
3. Noisy stationary construction equipment, such as compressors, shall be placed away from developed areas off-site and/or provided with acoustical shielding.	City inspects location of equipment.	Public Works (Eng)	Project Constr.	
4. Grading and construction equipment shall be shut down when not in use.	City shall inspect for compliance.	Public Works (Eng)	Project Constr.	
LIGHT & GLARE				
1. All new lighting shall be shielded to avoid glare and directed onto the project site and access ways.	(a) City shall review and approve lighting plan prior to issuance of Building Permit. (b) City shall inspect installation.	Planning Public Works (Eng)	(a) Building Permit Issuance (b) Project Constr.	
2. Low-level lighting shall be utilized in any parking area(s) as opposed to elevated high-intensity light standards.	(a) City shall review and approve lighting plan prior to issuance of Building Permit. (b) City shall inspect installation.	Planning Public Works (Eng)	(a) Building Permit Issuance (b) Project Constr.	
VISUAL				
1. All new utilities shall be placed underground.	(a) City shall review and approve plans prior to issuance of a Building Permit. (b) City shall inspect installation.	Public Works (Eng), Building Public Works (Eng)	(a) Building Permit Issuance (b) Project Constr.	

	MITIGATION MEASURE	METHOD OF MONITORING/REPORTING	VERIFYING DEPT.	TIME OF COMPLIANCE	INT. DATE
2.	The Developer shall:				
(a)	Submit to and receive approval by the Planning Department of a Landscape and Irrigation Plan designed and signed by a licensed landscape architect or landscape contractor prior to the issuance of a Building Permit, commencement of use, or approval of a Final or Parcel Map. The plan shall conform to the City of Napa's Water Efficient Landscape Guidelines. A final fencing and lighting plan may be included or submitted separately.	(a) City shall review and approve plan.	Planning	(a) Final/Parcel Map approval; Issuance of Building Permit, whichever comes first.	
(b)	Install or execute the City's Installation Agreement, including appropriate security, for the landscaping and irrigation.	(b) City shall inspect for compliance or Developer shall submit agreement.	Planning	(b) Final/Parcel Map, commence-ment of use, Cert. of Occupancy, whichever comes first.	
(c)	Prior to initial occupancy and the release of installation security, the licensed professional who signed the final landscape and irrigation plans (and final fencing and lighting plans if included) shall certify in writing to the Planning Director that he or she has inspected and approved and installation of the landscaping and irrigation (and fencing and lighting if included) and found them to be consistent with the approved plan and that the systems are in working order.	(c) Developer shall submit required certification.	Planning	(c) Cert. of Occupancy	
(d)	Prior to occupancy, the Developer shall execute and record the City's Landscape Maintenance Agreement.	(d) Developer shall submit required agreement prior to occupancy.	Planning	(d) Cert. of Occupancy	

MITIGATION MEASURE	METHOD OF MONITORING/REPORTING	VERIFYING DEPT.	TIME OF COMPLIANCE	INT. DATE
3. The Developer shall secure separate architectural review approval for any signage for the project.	City shall inspect for compliance.	Planning	Cert. of Occupancy	
TRANSPORTATION/CIRCULATION				
1. All required public frontage and street improvements shall be designed and built in accordance with City of Napa ordinances and the PWD Standard Specifications.	(a) City shall review and approve plans prior to issuance of a Building Permit. (b) City shall inspect construction.	Public Works (Eng) Public Works (Eng)	(a) Building Permit Issuance (b) Project Constr.	
2. During non-working hours, open trenches shall be provided with signage, flashers, and barricades approved by the Street Superintendent to warn oncoming motorists, bicyclists, and pedestrians of potential safety hazards.	City shall inspect for compliance.	Public Works (Eng)	Project Constr.	
3. All road surfaces shall be restored to pre-project conditions after completion of any project-related pipeline installation activities.	City shall inspect restoration prior to release of security.	Public Works (Eng)	Release of Security	
4. Any pedestrian access through and/or adjacent to the project site shall remain unobstructed during project construction or an alternate route established as approved by the Police Chief and Public Works Director.	City shall inspect for compliance.	Public Works (Eng)	Project Constr.	
5. In order to mitigate the cumulative impact of the traffic generated by the subject project on the City's arterial and collective street system, the Developer shall pay a Street Improvement Fee in accordance with Ordinance No. 4127 and Resolution 89-362 to pay for the traffic improvements identified therein. Such fee shall be payable at the rate in effect at the time of payment.	Developer shall submit required fee with application.	Building	Building Permit Issuance or Cert. of Occupancy/final inspection as applicable.	

	MITIGATION MEASURE	METHOD OF MONITORING/REPORTING	VERIFYING DEPT.	TIME OF COMPLIANCE	INT. DATE
PUBLIC SERVICES/SCHOOLS					
1.	Developer shall comply with all applicable requirements of the Uniform Fire Code and the City of Napa Fire and Public Works Standard Specifications including, without limitation, the requirements for access, new construction, smoke detectors, fire extinguishers, fire hydrants, etc. Existing fire hydrants may be used to meet hydrant location requirements only if they meet or are changed to meet current hydrant specifications.	City shall review and approve plans prior to issuance of a Building Permit.	Fire Prev.	Building Permit Issuance	
2.	Properties having common ownership shall provide the Fire Department with a notarized copy of the recorded conditions, covenants, and restrictions agreement in a form satisfactory to the City Attorney ensuring that all components of fire protection systems), and fire access roads will be maintained by a maintenance district, owner's association, or similar legally responsible entity.	Developer shall submit CC&R's to City prior to approval of the Final/Parcel Map.	Fire Prev.	Final Map Approval	
3.	All newly constructed buildings must have automatic sprinkler systems conforming to NFPA and City Standard Specifications, for which installation permit must be obtained from Fire Prevention. In multi-building complexes, or in buildings with three (3) or more stories, special monitoring conditions will be required. Existing habitable buildings which are retained shall be retrofitted.	(a) City shall review & approve plans prior to issuance of Building Permit. (b) City shall inspect construction.	Fire Prev. Fire Prev.	(a) Building Permit Issuance (b) Project Constr.	
4.	The Developer of any project proposing a change in occupancy use classification (as defined in the Uniform Building Code Table 5A) in a building protected by automatic fire sprinklers shall have the sprinkler system evaluated by a licensed fire sprinkler contractor or fire protection engineer for compliance with National Fire Protection Association Installation Standards. A written report of the inspection findings shall be submitted to the Fire Department prior to final occupancy clearance. A permit is required from Fire Prevention for sprinkler system alterations.	(a) Developer shall submit written report prior to occupancy clearance. (b) Applicant shall receive any required permits prior to occupancy.	Fire Prev. Fire Prev.	(a) Cert. of Occupancy (b) Cert. of Occupancy	

MITIGATION MEASURE	METHOD OF MONITORING/REPORTING	VERIFYING DEPT.	TIME OF COMPLIANCE	INT. DATE
5. The Developer of any project which proposes commercial occupancies shall secure approval from Fire Prevention and Building Departments prior to signing lease agreements and allowing occupancy of prospective occupants that pose possible fire and life safety hazards, or are classified, or are classified by the Uniform Building Code as an H (hazardous) occupancy. Examples of these types of occupancies are: Storage of flammable, combustible, explosive, or toxic materials, manufacturing processes involving the above, woodworking shops, fire rebuilding or storage, automotive repair, auto body repair and/or painting, factories where loose combustible fibers are present, semi-conductor fabrication facilities, bulk paint storage, etc.	Developer shall secure approval prior to signing lease agreements and allowing occupancy.	Fire Prev., Building	Prior to Occupancy/Cert. of Occupancy	
6. Developer shall pay the required fire and paramedic fees for new development in accordance with Napa Municipal Code Chapter 15.78. Such fees shall be payable at the rate in effect at the time of payment for the unit involved.	Developer shall submit required fee with application for permit.	Building	Building Permit Issuance or Cert. of Occupancy/final inspection, as applicable	
7. During the construction/demolition/renovation period of the project, Developer shall use the franchised garbage hauler for the service area in which the project is located to remove all wastes generated during project development, unless Developer transports project waste. If the Developer transports the project's waste, Developer must use the appropriate landfill for the service area in which the project is located. (Revised 9/95 & 11/95)	(a) Developer shall submit a statement indicating how waste will be handled prior to issuance of a Building Permit. (b) Developer shall submit copy of receipts from landfill or the franchised garbage hauler.	Public Works (Eng) Public Works (Eng)	(a) Building Permit Issuance (b) Project Constr.	

MITIGATION MEASURE	METHOD OF MONITORING/REPORTING	VERIFYING DEPT.	TIME OF COMPLIANCE	INT. DATE
8a. Developer shall provide for the source separation of wood waste for recycling. 8b. Developer shall use the franchised garbage hauler for the service area in which located for collection of such wood waste, unless the Developer transports such wood waste to a location where wood waste is recycled. (Revised 9/95 & 11/95)	(a) City shall inspect for compliance. (b1) Developer shall submit a statement indicating how wood waste will be handled prior to issuance of a Building Permit. (b2) A developer shall submit a copy of receipts from landfill or the franchised garbage hauler.	Public Works (Eng) Public Works (Eng) Public Works (Eng)	(a) Project Constr. (b1) Building Permit Issuance (b2) Project Constr.	
9. The Developer of a commercial, industrial or multi-family project with common waste disposal facilities shall submit to and receive approval from the Public Works Director of a source reduction plan which meets the City's Source Reduction and Recycling Element and implementing guidelines.	(a) Developer shall receive plan approval prior to issuance of Building Permit. (b) Developer shall file period reports.	Planning Public Works (Eng)	(a) Building Permit Issuance (b) As per schedule in approved plan	
10. A recycling/solid waste enclosure shall be provided in accordance with Chapter 17.102, et seq. of the NMC for all commercial, industrial and multi-family projects with common solid waste facilities.	(a) City shall review and approve plans prior to permit approval. (b) City shall inspect for compliance.	Planning Planning	(a) Building Permit Issuance (b) Cert. of Occupancy	
11. Developer shall pay the required fees for each new dwelling unit in accordance with the Napa Municipal Code Chapter 15.68. Such fee shall be payable at the rate in effect at the time of payment for the unit involved.	Developer shall submit the required fees with application for permit.	Building	Building Permit Issuance	

MITIGATION MEASURE	METHOD OF MONITORING/REPORTING	VERIFYING DEPT.	TIME OF COMPLIANCE	INT. DATE
12. Unless project approval requires only land dedication, the Developer shall pay in-lieu park dedication fee(s) in accordance with and for the purposes of NMC Sections 16.32.040, 15.68.010 and 15.68.090 for each residential unit authorized or allowed by project approval. Such fee(s) shall be payable at the rate in effect at time of payment.	Developer shall pay the requires fees prior to Final/Parcel Map, Building Permit, Cert. of Occupancy.	Building	Final/Parcel Map approval, Building Permit Issuance, Cert. of Occupancy/final inspection as applicable for type of project	
UTILITIES				
1. Prior to trenching within existing roadway areas, the Developer's engineer shall ascertain the location of all underground utility systems and shall design any proposed subsurface utility extensions to avoid disrupting the services of such systems.	(a) Developer shall call USA prior to construction. (b) City shall inspect construction works in public right-of-way.	Public Works (Eng) Public Works (Eng)	(a) Project Constr. (b) Project Constr.	
2. Water and energy conservation measures shall be incorporated into project design and construction in accordance with applicable codes and ordinances.	(a) City shall review and approve plans prior to issuance of a Building Permit. (b) City shall inspect for compliance.	Building Building	(a) Building Permit Issuance (b) Cert. of Occupancy	

	MITIGATION MEASURE		METHOD OF MONITORING/REPORTING	VERIFYING DEPT.		TIME OF COMPLIANCE	INT. DATE
3a.	The project shall be connected to the Napa Sanitation District for sanitary sewer service.	(a1)	Sanitation District shall provide written clearance prior to issuance of Building Permit.	Building	(a1)	Building Permit Issuance	
		(a2)	Sanitation District shall provide written clearance prior to issuance of Cert. of Occupancy.	Building	(a2)	Cert. of Occupancy	
3b.	If the subject property is presently served by individual sewage disposal systems, the septic systems, set backs, and reserve areas must be protected and maintained during cleaning, grading, construction, and after connection to the District, the existing septic tank(s) shall be properly destroyed.	(b)	The Dept. of Environmental Health shall provide written clearance prior to issuance of Cert. of Occupancy.	Building	(b)	Cert. of Occupancy	
4a.	The project shall be connected to the City of Napa water system.	(a)	City shall inspect for compliance.	Public Works (Water)	(a)	Cert. of Occupancy	
4b.	Any existing well must be properly protected from potential contamination. If an existing well is to be destroyed, a well-destruction permit must be obtained from the Napa County Department of Environmental Management by a licensed well driller. If an existing well is not destroyed, it must be properly protected and an approved backflow prevention device installed according to the Water District's specifications.	(b)	Developer shall submit a copy of the permit to City prior to issuance of Cert. of Occupancy or City will inspect for installation of approved backflow device.	Public Works (Water)	(b)	Cert. of Occupancy	
5.	The project shall be designed and built in accordance with the City of Napa Public Works Department Standard Specifications regarding the adequate conveyance of storm waters.	(a)	City shall review and approve all plans and specifications and inspect construction.	Public Works (Eng)	(a)	Final Map Approval or Bldg. Permit Issuance, whichever comes first.	
		(b)	City shall inspect construction.	Public Works (Eng)	(b)	Project Constr.	

MITIGATION MEASURE	METHOD OF MONITORING/REPORTING	VERIFYING DEPT.	TIME OF COMPLIANCE	INT. DATE
ARCHEOLOGICAL/HISTORICAL/CULTURAL				
1. If any archeological materials or objects are unearthed during project construction, all work in the vicinity shall be immediately halted until a qualified archeologist is retained by the City to evaluate the finds. Developer shall comply with all mitigation recommendations of the archeologist prior to commencing work in the vicinity of the archeological finds.	(a) City shall inspect construction activities. (b) City shall approve archeologist's report and require mitigation.	Public Works, Building Dept., Planning Planning	(a) Project Constr. (b) Release of Stop Order	
BUILDING				
1. Developer shall comply with all requirements of federal, state, and local laws applicable to project construction and issuance of Building Permits.	Developer shall submit plans to City and other affected agencies for review and approval; Developer shall pay all required fees.	Building	Building Permit Issuance	
IMPLEMENTATION				
1. Developer shall comply with the monitoring/reporting check lists development pursuant to the City of Napa Resolution 90-108 regarding CEQA implementation procedures for both standard and project specific mitigation measures.	(a) Each City department shall submit to Planning Dept. a sign off that each construction-related mitigation plan for which the department is responsible is completed at time of compliance. (b) For each on-going mitigation measure a separate schedule shall be included in the monitoring program for that mitigation measure.	Planning Planning	(a) At time of compliance for each measure. (b) Project Approval	

	MITIGATION MEASURE	METHOD OF MONITORING/REPORTING	VERIFYING DEPT.	TIME OF COMPLIANCE	INT. DATE
2.	Unless otherwise provided, all measures included in project approval pursuant to NMC Chapter 17.60 (CR suffix and flood evacuation) shall be installed or carried out prior to final clearance of the Building Permit or concurrently with the installation of site improvements in the case of a subdivision map.	City shall review and approve plans and schedules.	Public Works; Planning	Final clearance of Building Permit or installation of improvements	
3.	Developer shall notify all employees and agents of the mitigation measures and conditions applicable to the project and shall ensure compliance with such measures and conditions. Developer shall also notify all assigns and transfers of the same.	(a) City shall record resolution approving project.	Planning Public Works, Bldg., Fire Prev.	(a) Project Approval	
		(b) Developer shall submit certificates to the City indicating compliance. Such certificates shall be submitted prior to issuance of a grading permit, Building Permit and Cert. of Occupancy.	Planning Public Works, Bldg., Fire Prev.	(b) Grading Permit, Building Permit, Cert. of Occupancy	

*Whenever implementation of a mitigation measure requires approval or compliance prior to issuance of a Building Permit, that implementation shall be read as requiring approval or compliance prior to the commencement of a use in the event a Building Permit will not be required.

APPENDIX E

CITY OF NAPA
POLICY RESOLUTION 27

ATTACHMENT B
STANDARD CONDITIONS

GENERAL

1. Developers shall pay all applicable fees and charges at the required time and at the rate in effect at time of payment (see Policy Resolution 16 as amended for a partial listing of applicable fees and Policy Resolution 16 or individual departments regarding the timing of fee payment requirements).

2. The authorized project is limited to the project as described in Developer's application, correspondence and final submitted plans and specifications and in accordance with the Developer's representations and agreements made at the public hearing(s) on the project. All project development, including the design and construction of improvements, shall be consistent with the same.

3. The design and construction of all improvements shall comply with the General Plan, any applicable Specific Plan, the Napa Municipal Code (NMC), City ordinances and resolutions, the "Standard Specifications," of the Public Works and Fire Departments and with the plans and specifications submitted to and approved by City.

4. The time limit within which to commence any lawsuit or legal challenge to any quasi-adjudicative decision made by the City is governed by Section 1094.6 of the Code of Civil Procedure, unless a shorter limitations period is specified by any other provision. Under Section 1094.6, any lawsuit or legal challenge to any quasi-adjudicative decision made by the City must be filed no later than the 90th day following the date on which such decision becomes final. Any lawsuit or legal challenge which is not filed within that 90-day period will be barred.

5. The Developer shall defend and indemnify and hold the City, its agents, officers, and employees harmless of any claim, action or proceedings to attack, set aside, void or annul the approval so long as the City promptly notifies the Developer of any such claim, action, or proceedings, and the City cooperates fully in the defense of the action or proceedings.

6. Developer is responsible for all fees related to filing of environmental documents for the project with the County Clerk.

7. If the Developer is not the owner of the subject property, all agreements required to be executed by the City must be executed by the Owner(s) as well as the Developer.

8. The Developer shall pay all City staff development fees which are or may become due to City pursuant to Napa Municipal Code Section 2-204, et seq.

APPENDIX E

PLANNING DEPARTMENT

1. No use authorized by a use permit or planned development permit may commence until after the Developer executes any required permit agreement.

PUBLIC WORKS DEPARTMENT

1. The Developer shall install a minimum one-inch thick asphalt concrete overlay whenever an existing City street pavement is cut for utility installations. This shall apply to either longitudinal or transverse cuts, and shall extend a sufficient distance beyond the cuts to allow a smooth transition. Resurfacing may be required to extend to the edge of the existing pavement or to the gutter lip. The limits of the resurfacing will be determined by the Public Works Director as part of the construction improvement plan review.

2. Approved backflow prevention devices shall be installed on all new and existing water services for both domestic and fire services.

3. Any retaining walls which are adjacent to a property line shall be masonry or concrete. Wood retaining walls shall not be installed adjacent to property lines.

4. Installation of street paving shall include reconstruction of the existing pavement section to provide adequate conforms. The limits of such reconstruction shall be reviewed and approved by the Public Works Director as part of the construction plan review.

5. The following standard condition is applicable to use permit approvals:

   The Developer shall submit to the Public Works Department construction improvement plans for all on and off-site improvements, including detailed designs for all utilities, water, grading, drainage, erosion control, paving and solid waste storage and recycling areas. The plans shall be prepared by a registered civil engineer unless the Public Works Director authorizes them to be prepared by some other qualified professional. The plans must be reviewed and approved by the Public Works Director prior to issuance of the building permit for the project. If no building permit is required, the plans must be approved by the Public Works Director prior to establishment of the use. All required improvements shall be completed by the Developer prior to occupancy and establishment of the use. To guarantee completion of the improvements, the Developer shall enter into an agreement with the City and provide a security acceptable to the City prior to issuance of any building permit. An agreement will not be required if the Developer completes all of the required improvements to the satisfaction of the Public Works Director prior to issuance of the building permit.

6. The following standard conditions are applicable to tentative subdivision and parcel map approvals:

   (a) Prior to approval of the Final Map or Parcel Map, the Developer shall furnish the Public Works Department with proof of the payment of the mapping service fee as required by Napa County Board of Supervisors Resolution No. 92-119.

   (b) Prior to approval of the Final Map, the Developer shall provide proof of workers compensation insurance and general liability insurance in the forms and amounts as

required by the City Attorney. Typically a one million dollar general liability insurance certificate is required.

(c) If multiple final maps are filed, all required improvements shall be installed with the first final map unless a plan showing the detailed phasing of the multiple final maps and installation of improvements is approved by the Planning and Public Works Directors prior to approval of the first map.

(d) The Developer shall grant public utility easements adjacent to the public street right-of-way. The size and locations of the easements shall be determined by the Public Works Director based on consultations with representatives of the utility companies.

7. The Developer shall furnish proof satisfactory in form to the City Attorney of the acquisition of all rights of entry, permits, easements, etc., necessary to construct the project or to satisfy required project mitigation measures and/or conditions prior to map approval or commencement of the use if no map is required.

COMMUNITY RESOURCES DEPARTMENT

1. A refundable deposit as set by Policy Resolution No. 16 for each street tree required pursuant to N.M.C. Section 15.48.030C is to be paid at the time building permits are issued. Street trees from the City of Napa Street Tree List (available at the Community Resources Department) are to be planted in accordance with the City Street Tree Planting Specifications contained in the PWD Standard Specifications. The exact location of trees and number will be determined in accordance with these standards.

2. All street trees within the public right-of-way shall be maintained by adjacent property owner or a homeowner's association (NMC Section 12.44.050). Plantings must conform to Section 27 of the Napa Municipal Code and City Landscape Standards. Developer shall submit evidence of satisfactory assurance of this required prior to approval of parcel or final map, commencement of use or issuance of a building permit, whichever comes first. For areas to be maintained by a homeowner's association, the evidence shall include a copy of the CC&Rs and association document for review and approval by the City Attorney.

3. All street back-on landscape required by the City shall be maintained by a homeowners association or the City-Wide Landscape Assessment District. For areas to be maintained by a homeowners association, Developer shall submit a copy of the CC&Rs and association document for review and approval by the City Attorney. For areas placed in Landscape Assessment District, Developer shall submit landscape and irrigation plans to the CRD for approval in accordance with NMC Section 12.44.020. Plans must conform to the CRD's Specifications for Street Back-On and Median Strip Landscaping a copy of which is available from the Community Resources Department. Developer shall submit evidence of appropriate satisfaction of this requirement prior to approval of final map.

APPENDIX E

Appendix C
General Plan Consistency with the Congestion Management Plan

APPENDIX E

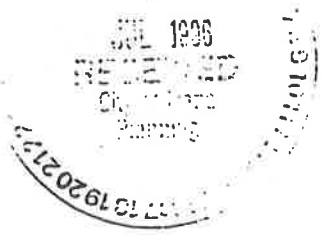
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NAPA COUNTY
CONGESTION MANAGEMENT AGENCY

LaVerne Oyarzo
Chair

1195 Third Street Room 201, Napa, California 94559
Phone (707) 253-4351 Fax (707) 253-4627

July 29, 1996



Deborah Faaborg
City of Napa
P.O. Box 660
Napa, California 94559

Ms. Faaborg:

We have received from the traffic consultant working on the City's general plan information on the land-use of the plan versus the land-use in the CMP database. According to the Program a traffic analysis using the CMP model must be completed for general plans, general plan amendments (including specific plans), zoning changes, subdivisions, planned developments and use permits which increase the amount of traffic being generated by the current use by five hundred or more peak hour trips and is not fully contained in the current CMA land-use data base.

The CMP's land-use database is constructed by allowing all the jurisdictions to submit their best estimate of their land-uses at the target year and as a group adjusting those land-uses to arrive at a mutually agreed figure that is within one percent of the ABAG projections for the county as a whole. This process often means that individual agencies accept changes to their best estimates, either up or down, to meet the regional control totals. It also results in a database that all the jurisdictions have agreed upon.

The CMA has 2000, 2010 and 2020 databases that were constructed in this manner. Although 2020 is not covered by ABAG projections, the CMA, by mutual agreement, is within a range that was set using DOF, ABAG and other projections as a starting point. We are not sure how the City constructed the 2020 land-use database outside its boundaries for the general plan without the input of the various jurisdictions. It appears unlikely that the City's will agree with the 2020 countywide database. Although we are restricting this letter to the possible CMP analysis requirements, it may be of value for the City to consider, in the future, using information that all of the jurisdictions have agreed to for the communities surrounding the City for any independent analysis that Napa desires so that we will all have a common point of understanding.

As the CMP has a much shorter horizon than the City's new General Plan, the consultant compared the TAZs in the City of Napa from a 2000 land-use scenario derived by interpolation of the countywide 1992 land-use base and the City's 2020 to the CMP 2000 land-use base.

Reducing the City's 2020 could lead to partial projects in the interpolated 2020 that will not exist in 2000, growth patterns that will not follow what the City expects in 2000, and/or less growth in some TAZs than the City expects in 2000. Nonetheless, unless the City has constructed a 2000 land-use scenario for the new General Plan, this is an expedient and useful method of determining the differences between the growth the CMA projects and the growth that the City expects. It would be very unusual, using this method, that some differences did not appear between the CMA 2000 that was crafted directly and the interpolated 2000 for the City.

Indeed, the consultant's analysis does indicate some differences. The total trips generated is five hundred and ninety larger for the CMA, two TAZs show the City generating more than two hundred
trips more than the CMA (142 and 159), and two zones generate more than one hundred and fifty trips less for the City than in the CMA model (104 and 113). Amazingly, four TAZs show no difference and forty-seven zones show a difference of nine or fewer trips. The average difference is only four point nine trips and the percentage difference over all trips is one point two percent.

Overall, the differences are minor, are understandable given the derivation of the City 2000 database, no single TAZ has the City generating anywhere near the five hundred peak hour trigger level difference, and the City's interpolated 2000 is less intense and generates fewer trips than the CMAs.

Given these facts, no CMP analysis of the City's new general plan will be necessary as long as the land-use does not change from the data of the consultant's investigation.

If you have any questions, please call me at 259.8179.

Sincerely,

John Ponte
Manager

JP
cmp96/cofngp.let

Appendix D
Supplemental Traffic Analysis
Excluding Souza Lane

APPENDIX E

Dowling Associates, Inc.
Transportation Engineering • Planning • Research • Education

February 6, 1997

Mr. Frank Sanchez
Public Works Dept.
City of Napa
P.O. Box 660
Napa, CA 94559

SUBJECT: Analysis of Souza Lane and Saratoga Drive Extensions P930034

Dear Frank:

At your request, I have reviewed the data and analysis for the analysis of the omission of Souza Lane in the City of Napa General Plan. I found that the files I used for the January 13 memo were in fact somewhat out of date, and that there was more current data available. A better choice of data, and the one I have made for this memorandum, would be to use the model run and files used for the General Plan Update Draft EIR. The network for the GPEIR contains all of the improvements that are included in the General Plan, including extensions of Souza Drive, Saratoga Drive in the immediate area of concern. The plan also includes proposed improvements to Silverado Trail at Soscol Avenue as well as a planned extension of Gasser Drive to intersect Soscol Avenue at Gasser Drive.

I reran the City of Napa Travel Forecast Model using the same land use and network data as was used for the proposed General Plan, but removed the Souza Lane Extension from the network. This would give us the impacts of including or excluding this street within the overall context of the General Plan. The General Plan and both alternatives tested include Saratoga Drive as a new street.

The results of this analysis, shown in the accompanying table, indicate virtually no effect on the surrounding intersections, a result that I believe is more in keeping with what one would expect for what is essentially an internal circulation modification. I note that the intersection with which you were specifically concerned, Third Street & Silverado Trail, would be Level of Service D in both cases. However, the policies in the updated General Plan permit LOS D citywide and actually permit LOS E at this location as part of a recognition of the difficulty of making improvements in the Downtown area. This not only would the Saratoga Drive extension have negligible impact on this intersection, but it would in fact meet the policy guidelines of the proposed General Plan.

I hope this information is useful to you. Please feel free to call if you have any questions regarding this material.

Sincerely,

Stephen Lowens
Principal

180 Grand Avenue • Suite 995 • Oakland, CA 94612 • (510) 839-1742 • FAX (510) 839-0871
E-mail: dowlinga@ix.netcom.com

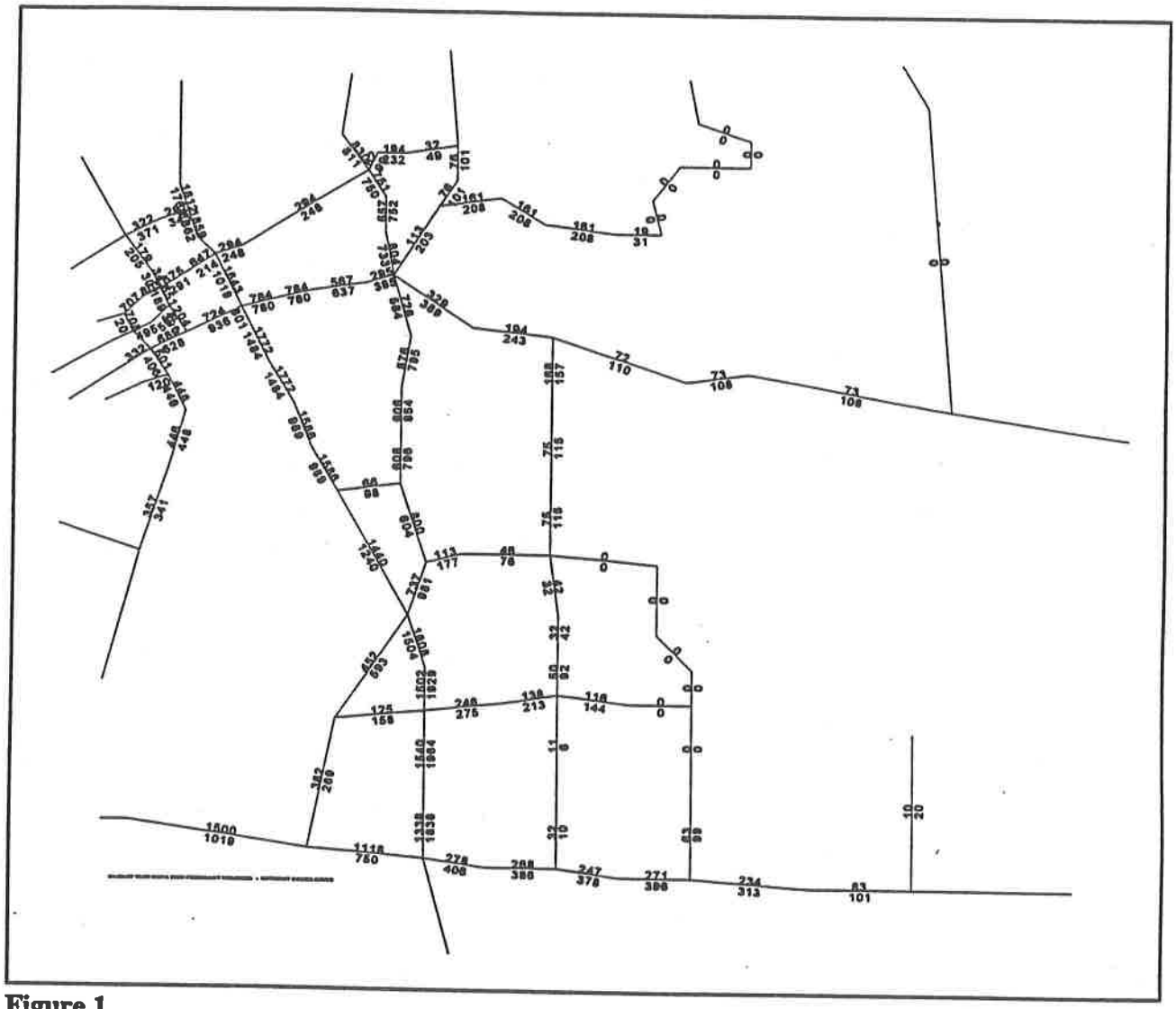


Figure 1
Projected 2020 Traffic Volumes
Network Excludes Souza Lane

January 29, 1997

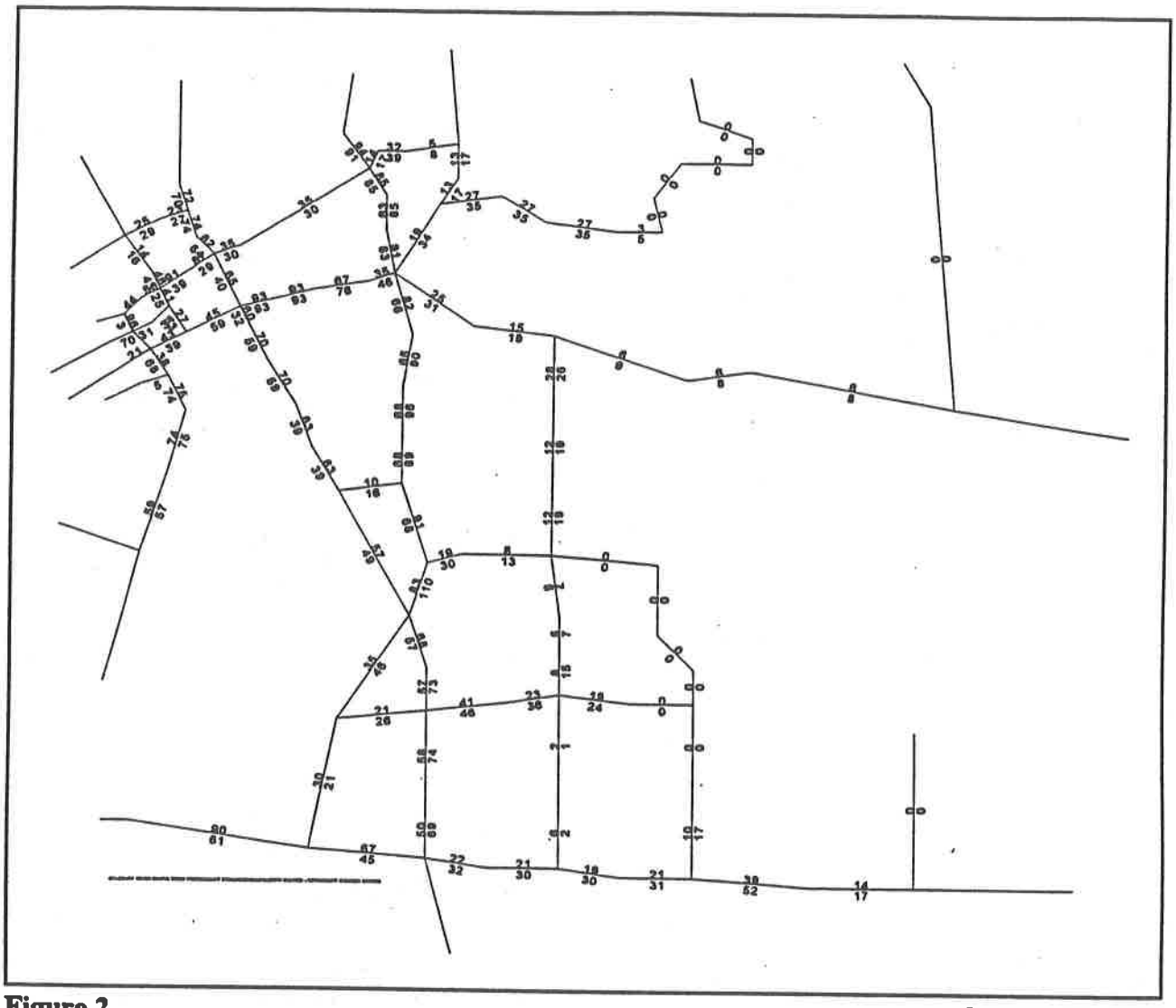


Figure 2
Projected 2020 Volume/Capacity Ratio
Network Excludes Souza Lane

January 29, 1997

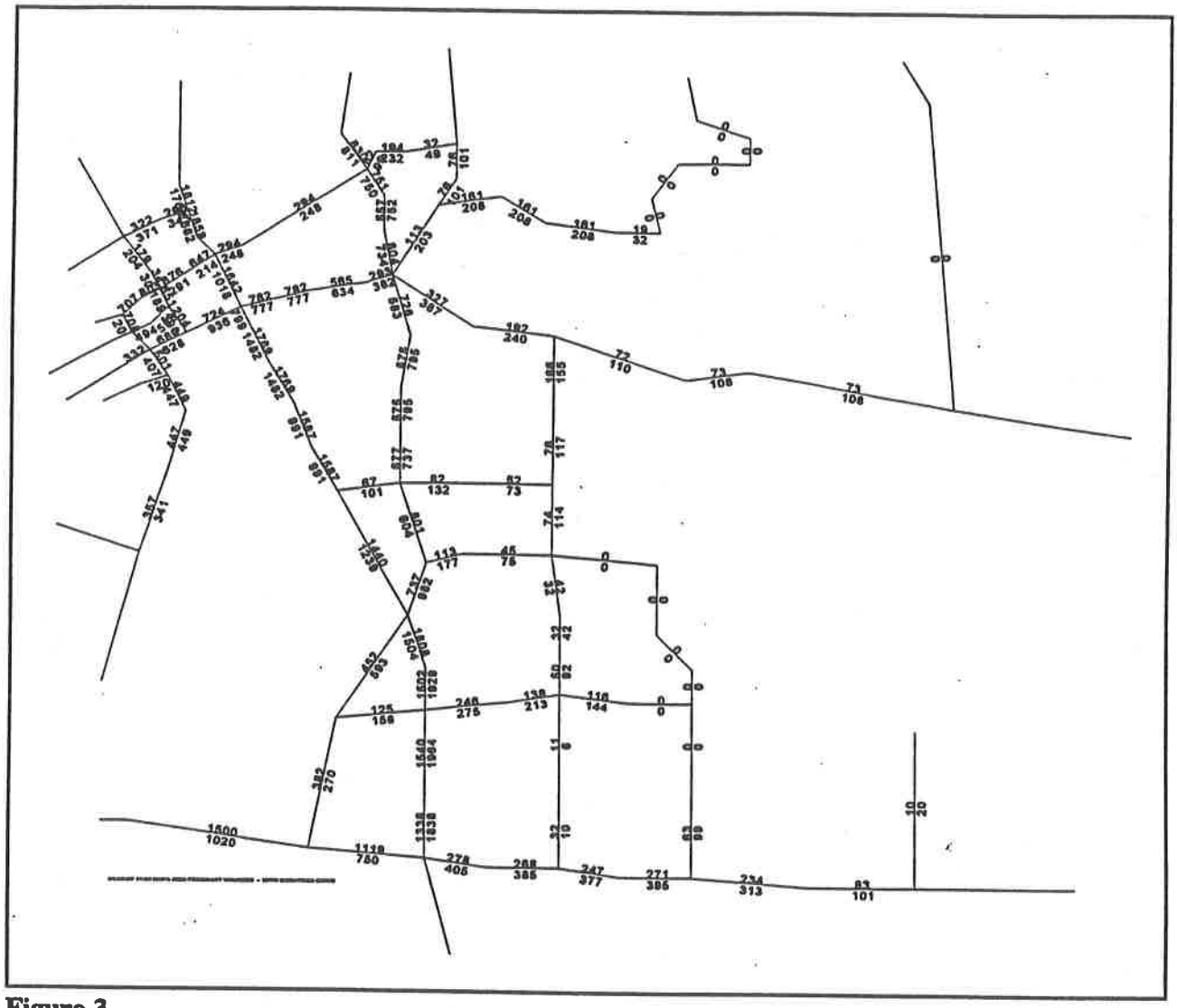


Figure 3
Projected 2020 Traffic Volumes
General Plan Network
Includes Saratoga Drive

April 3, 1996

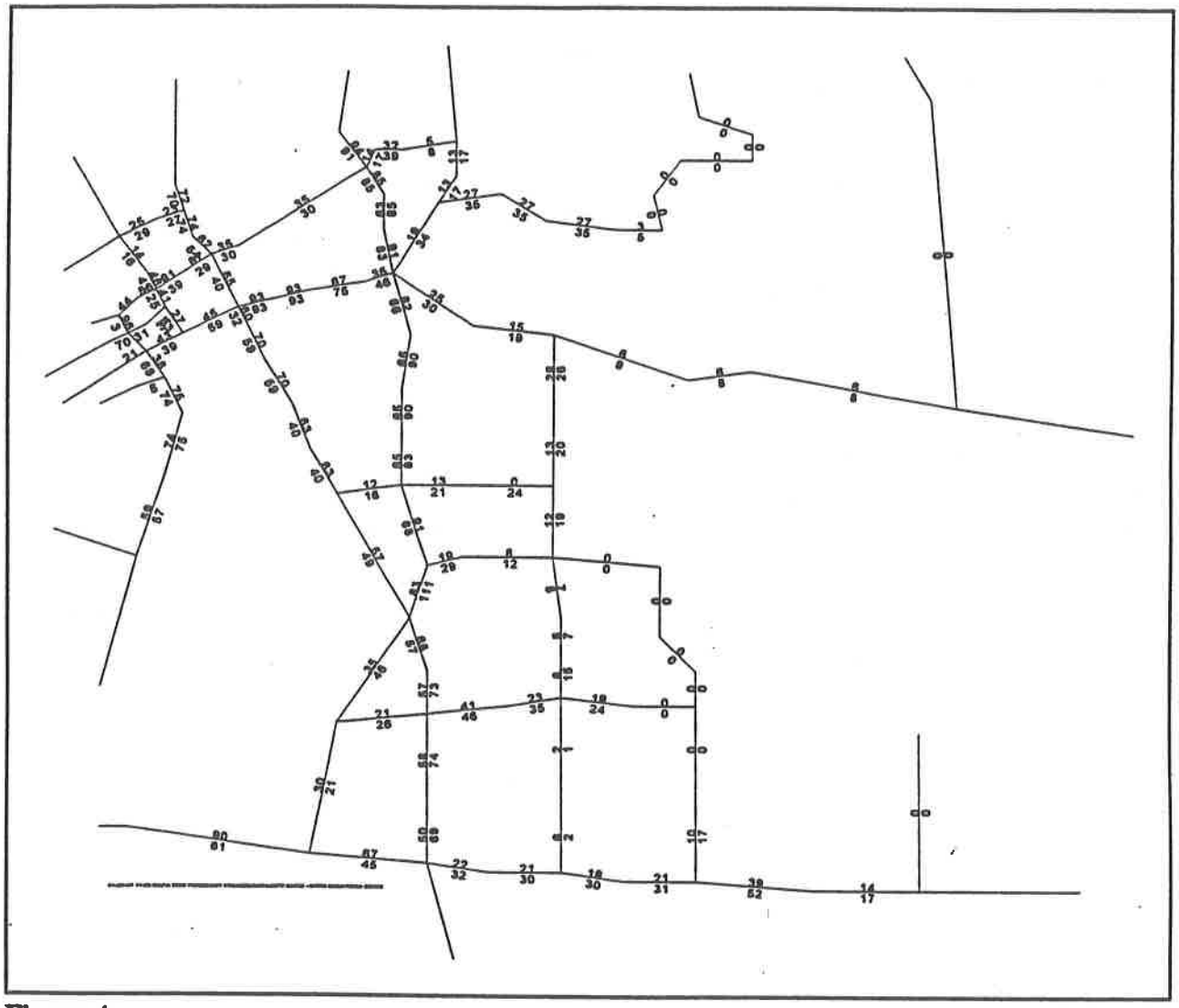


Figure 4
Projected 2020 Volume/Capacity Ratio
General Plan Network
Includes Saratoga Drive

April 3, 1996

Table 1
Comparison of Service Levels at Nearby Intersections
Year 2020 Forecast
With and Without Souza Lane

	With Souza (General Plan Policy)			Without Souza		
	LOS	Del/ Veh	V/ C	LOS	Del/ Veh	V/ C
#1552 First St at Soscol Ave	B	12.2	0.61	B	12.2	0.61
#1566 Lincoln Ave at Silverado Trail	B	15.0	0.64	B	15.0	0.64
#1580 First St at Silverado Trail	B	8.9	0.64	B	8.9	0.64
#1684 Second St at Main St	B	7.0	0.36	B	7.0	0.36
#1686 Third St at Main St	B	8.8	0.72	B	10.2	0.73
#1688 Third St at Soscol Ave	C	21.4	0.84	C	21.6	0.85
#1702 Third St at Silverado Trail	D	36.3	1.05	D	36.3	1.05
#1838 Soscol Ave at Silverado Trail	C	15.3	0.90	C	15.3	0.90
#1918 Imola Ave at South Coombs St	C	21.6	0.79	C	21.6	0.79
#1922 Soscol Ave at Kansas Ave	B	11.5	0.74	B	11.5	0.74
#1926 Soscol Ave at Imola Ave	C	17.9	0.72	C	17.9	0.72



CITY OF NAPA GENERAL PLAN

DECEMBER 8, 1997

RESPONSE TO COMMENTS
ON 10/1/96 DRAFT ENVIRONMENTAL IMPACT REPORT

State Clearinghouse #95-03-3060

APPENDIX E

CITY OF NAPA GENERAL PLAN

ENVISION NAPA 2020

DRAFT GENERAL PLAN/DRAFT EIR COMMENTS AND RESPONSES TO COMMENTS

PREPARED BY:

CITY OF NAPA PLANNING DEPARTMENT

AND

MINTIER ASSOCIATES

DECEMBER 8, 1997

APPENDIX E

Response to Comments
Table of Contents

Preface iv

Introduction 1

Standard Responses 3

CEQA Application to General Plans 3

Rural Urban Limit (RUL) / Agricultural Land 5

Stanly Ranch 9

Big Ranch Specific Plan and EIR 13

Transportation 14

Wastewater 16

Water Supply 18

Flood Control 23

Responses to Individual Comments 26

1. Napa Chamber of Commerce - *1 comment* 26
2. Friends of the Napa River - *7 comments* 26
3. Friends of the Napa River - *1 comment* 28
4. Napa Chamber of Commerce - *1 comment* 28
5. Louise Clerici - *7 comments* 28
6. California Department of Forestry and Fire Protection (CDF) - *1 comment* 29
7. Napa Valley College - *2 comments* 30
8. Metropolitan Transportation Commission - *1 comment* 31
9. Napa Sanitation District - *5 comments* 34

10.	Napa County Congestion Management Agency - *24 comments*	35
11.	The California Native Plant Society - *8 comments*	40
12.	Napa County Conservation, Development and Planning Department - *7 comments*	42
13.	Napa County County Counsel - *24 comments*	44
14.	Sierra Club Napa County Group - *1 comment*	50
15.	Napa County Local Agency Formation Commission - *2 comments*	50
16.	Chris Malan - *4 comments*	50
17.	Committee of Concerned Citizens - *2 comments*	51
18.	Susan Levine-Roust - *2 comments*	51
19.	Susan Rushing-Hart - *22 comments*	52
20.	John Rutherford - *1 comment*	56
21.	North Bay Association of Realtors - *2 comments*	56
22.	Cathy Zeller, et. al. - *1 comment*	56
23.	Dennis Scherizinger - *1 comment*	57
24.	Friends of the Napa River - *45 comments*	57
25.	Friends of the Napa River - *2 comments*	63
26.	Moira Johnston Block - *1 comment*	63
27.	Sierra Club Napa County Group - *64 comments*	64
28.	Napa County Conservation, Development and Planning Department - *4 comments*	75
29.	Napa County Local Agency Formation Commission - *1 comment*	76
30.	Susan Rushing-Hart - *6 comments*	77
31.	Louise Clerici - *20 comments*	78
32.	Charles W. Shinnamon - *6 comments*	80
33.	Mark Brewer - *2 comments*	81
34.	Muriel Fagiani - *1 comment*	82
35.	Ray Valeri - 1 *comment*	82
36.	Judy Irvin - *11 comments*	82

37. John Clifton - *16 comments* 84

38. State of California Office of Planning and Research - *1 comment* 87

39. Napa County LAFCO - *1 comment* 87

40. Napa Valley Wine Train - *3 comments* 88

41. Napa County Farm Bureau - *6 comments* 88

42. Louise Clerici - *1 comment* 88

Comments Received at DEIR Public Hearings October 17 and October 24, 1996 89

A. Muriel Fagiani - *2 comments* 89

B. Chris Malan - *5 comments* 89

C. Richard Nieman - *1 comment* 90

D. Muriel Fagiani - *2 comments* 90

E. Dorothy Glaros - *1 comment* 90

F. Planning Commissioner Mulford - *3 comments* 91

G. Planning Commissioner Hover - *1 comment* 91

Appendices

Comment Letters and Hearing Minutes

PREFACE

This is the Response to Comments Document prepared to answer comments and questions submitted on the Draft General Plan Documents and the General Plan Draft Environmental Impact Report (Released 10/1/96). The City has prepared this comprehensive set of responses as a result of the extensive comments submitted on the first Draft EIR (DEIR) and on the Draft General Plan Documents. Although not required, this document contains responses prepared for non-CEQA comments on the Draft General Plan as well as comments related to environmental concerns. As a result of this process, the City has revised sections of the DEIR in order to more accurately reflect the discussion of details in the Response Document and to incorporate changes to the project description contained in Addenda which have been prepared for the Draft General Plan. The Revised Draft EIR (RDEIR), along with the Response to Comment Document and General Plan Addenda, is recirculated for public review pursuant to Section 15088.5 of the State CEQA Guidelines. The Response to Comments Document is considered a part of the Revised DEIR and is included by reference. The Addenda to the General Plan Policy Document recommend changes to the Policy Document to improve accuracy and enhance the mitigating ability of certain policies. In order to avoid the confusion and the sense of a "moving target" that could result from revisions to the Draft General Plan Document, the draft document has been left unchanged and in the form of its August 1996 release. Recommended changes to the Policy Document are described under specific subject headings in the Addenda. Although the Revised DEIR, the Response to Comments and the Addenda have been bound separately, the information is interconnected and the documents should be read in concert. All three documents have been circulated and made available simultaneously for public review along with the Draft General Plan Documents originally released in 1996.

Please contact the City of Napa Planning Department, 1600 First Street, Napa, CA -- (707) 257-9530, if you wish to obtain any of the documents described above.

INTRODUCTION

EIR Review Process

The State CEQA Guidelines requires that agencies preparing EIRs "provide adequate time for other public agencies and members of the public to review and comment on a draft EIR" (Section 15203). While the law does not generally define what constitutes adequate time, it does specify that draft EIRs submitted to the State Clearinghouse of the Governor's Office of Planning and Research should be subjected to a review period of at least 45 days. Section 15025 of the *State CEQA Guidelines* requires that draft EIRs for four classes of projects be submitted to the Clearinghouse:

1. Those for which a state agency is the Lead Agency;

2. Those projects for which a state agency is a Responsible Agency, Trustee Agency, or otherwise has jurisdiction over the project;

3. Projects of statewide, regional, or areawide significance; and

4. Reports prepared pursuant to the requirements of the National Environmental Protection Act (NEPA).

The *Guidelines* (Section 15026)(b)(1)) defines local general plans as projects fitting into the third category above (i.e. projects of statewide, regional, or areawide significance).

The Draft EIR for the Draft City of Napa General Plan was formally released for public review on October 4, 1996, marking the beginning of a 45 day mandatory review period concluding on November 18th. In response to requests made at the DEIR hearings the Planning Commission extended the review period to December 2,1996, resulting in a total DEIR review period of 60 days.

On October 4, copies of the Draft EIR and other Draft General Plan Documents were sent to 30 organizations and local, state and federal agencies either directly or through the State Clearinghouse. Additional document sets were provided to local organizations such as the Chamber of Commerce, Board of Realtors, etc. Fifteen sets of the Draft General Plan Documents and DEIR were submitted to the State Clearinghouse along with a notice of completion indicating the desired distribution for state agency review. A "Notice of Completion and Availability" of the Draft General Plan and DEIR documents were mailed to 409 individuals who had requested written notice of General Plan availability and proceedings. A display ad was published in the local newspaper notifying the public of document availability and the public review and comment process. Copies of the Draft EIR and General Plan documents were made available for review at the City of Napa Planning Department and at the City/County Library. Copies were also provided for check-out or purchase at the Planning Department.

On November 18, 1996, a notice of extension of the public review period to December 2 was sent to all agencies and parties previously noticed as described above and another display ad regarding the extension was published in the local newspaper; availability of Addenda #1 and # 2 to the Policy Document was included in the notice and copies of the addenda were circulated to agencies for comment. On November 25, the City published an additional notice in the newspaper regarding the availability of two Addenda to the General Plan Policy Document. It should be noted that the addenda had been distributed to the Planning Commission and informally made available to the public in late October 1996.

Although not legally required by CEQA, during the public review period, the Planning Commission held hearings on October 17th and October 24, 1996, to receive input on the Draft EIR. Also during the public review period, the Planning Commission held six study sessions on the General Plan Documents. These study sessions were

noticed and open to the public; and, in most cases, occurred as the last item on a regular Planning Commission Agenda.

By the close of the extended review period on December 2, 1996, the City had received 38 written communications. During the two public hearings on the Draft EIR held on October 17th and October 24th, the City received oral testimony from seven individuals. After the close of the public comment period on December 2nd, the City received three additional written communications. The communications and hearing record constituted a total of 344 separate comments, each requiring a written response.

Responses to Comments

All written communications were numbered in the order received and logged by the Planning Department. Every distinct, substantive comment in each communication was given a separate number. In this way, every comment is individually coded with the communication number before the decimal and the comment number after the decimal (e.g., letter 2, comment 3 is designated with "2.3"). Comments addressing the Draft EIR were noted with an "E" (e.g., 2.1E), and comments addressing the Draft General Plan Documents were noted with a "G" (e.g., 2.2G). Comments received at the October 17 and October 24 public hearings before the Planning Commission are at the end of the Response to Comments document and are coded using an alphabetical system (A.1E etc.) The response to comment process of CEQA does not require responses to non-environmental comments; however, in the interest of continuity, responses have been provided for both General Plan and DEIR comments.

To minimize repetition in the responses, a set of "standard responses" were prepared for the following subjects:

- CEQA Application to General Plans
- Rural Urban Limit Line (RUL)
- Stanly Ranch
- Big Ranch Specific Plan and EIR
- Transportation
- Wastewater
- Water Supply
- Flood Control

Recirculation of the Draft EIR

Section 15088.5 of the *State CEQA Guidelines* requires recirculation of the an EIR when significant new information is added to the EIR after the draft has been released for public review. While the City does not feel recirculation of the Draft General Plan EIR is required by the *CEQA Guidelines* in this case, the City has nonetheless revised and recirculated the Draft EIR to:

- Expand the background information concerning several categories of impacts
- Provide more detailed explanation of environmental conclusions
- Reexamine findings of significance for several impacts
- Provide an opportunity for public comment on this additional information.

The City believes recirculation will result in a more informed discussion of the General Plan and ultimately to a more complete set of general plan goals, policies, and implementation measures.

The Draft EIR has been revised in the following ways:

1. A verbatim copy and a summary of all comments received on the Draft General Plan and the Draft EIR during the public review period in the Fall of 1996 and a response to all comments have been added to the Draft EIR.

2. The project description has been revised to:

   a. Adjust the RUL to include a 5 acre parcel at the northeast corner of Trancas and Silverado Trail and to designate it TC - Tourist Commercial. The subject parcel has been incorporated land under City's jurisdiction since March 1973 and is inside the City's Sphere of Influence. (Addendum #1)

   b. Designate land outside the proposed RUL as "G" - Greenbelt. This represents a continuation of the designation in the existing General Plan. (Addendum #2)

   c. Revise the General Plan to reflect the adoption of the Big Ranch Specific Plan in October 1996. These changes involve land use designations, circulation adjustments and minor text references to the status of the Big Ranch Specific Plan. (Addendum #3)

   d. Eliminate the Sousa Lane roadway connection in transportation project list. (Addendum #4)

3. The text of the Draft EIR has been revised to add or correct descriptive information based on comments on the Draft EIR.

4. Significance criteria for some types of impacts have been revised based on reconsideration and review of other related environmental documents.

5. Findings of Significance for several types of impacts have been revised based on reconsideration and review of other related environmental documents.

The Revised Draft EIR shows changes made to the October 2, 1996, Draft EIR through underline and strike out.

STANDARD RESPONSES

STANDARD RESPONSE CEQA APPLICATION TO GENERAL PLANS

City and county general plans, specific plans, facility master plans, and most regulatory actions potentially affecting the physical environment are defined as projects under the California Environmental Quality Act (CEQA) and must be reviewed for their possible environmental consequences.

Planning and land use regulation at the local level in California is organized in hierarchical fashion due to state requirements for consistency. The General Plan is at the top of the hierarchy and virtually all regulatory and capital facility decisions made by the adopting agency must be consistent with the General Plan. The General Plan is the broadest statement of local land use, development, and environmental policy. Specific plans, authorized by state law, are prepared for the systematic implementation of the General Plan. These plans typically focus on a limited geographical territory (e.g. a few acres to square miles) and provide much more development detail for an area than the General Plan. Zoning, subdivision approvals, and other discretionary permits must be consistent with both the General Plan and any applicable specific plan.

CEQA recognizes that environmental analysis needs to be appropriate for the level of policy or type of project being considered. Section 15146 of the State CEQA Guidelines addressed this issue as follows:

Sec. 15146 Degree of Specificity

The degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR.

(a) An EIR on a construction project will necessarily be more detailed in the specific effects of the project than will be an EIR on the adoption of a local general plan or comprehensive zoning ordinance because the effects of the construction can be predicted with greater accuracy.

(b) An EIR on a project such as the adoption or amendment of a comprehensive zoning ordinance or a local general plan should focus on the secondary effects that can be expected to follow from the adoption or amendment, but the EIR need not be as detailed as an EIR on the specific construction projects that might follow.

Recognizing the hierarchical nature of planning and project decision-making, the State CEQA Guidelines provide for use of "program EIRs" and tiering. The Draft EIR on the Draft General Plan was designed as a "program EIR" as explained in the Introduction (page 1-1):

> *The purpose of the EIR is to evaluate the environmental impacts of the adoption and implementation of the Draft Napa General Plan. Adoption of the General Plan by itself does not result in land development, additional traffic, or loss of natural resources; however, it enables such development or actions to occur. This EIR, therefore, addresses what may occur as a result of the General Plan adoption. Because this EIR addresses a series of future actions, this EIR is a "program" EIR. The concept of a program EIR was incorporated into the CEQA Guidelines in recognition of the fact that many types of projects that require environmental review are approved over time in a series of actions. The Legislature and the state administrators of CEQA recognized that it would be inefficient to require a new environmental document at each stage of development unless that stage disclosed new facts or environmental considerations not previously studied or analyzed -- in which case those additional effects would be addressed by an additional document. The program EIR allows decision-makers to consider broad policy alternatives and program-wide mitigation measures at a point when the City has greater flexibility to deal with basic problems or cumulative impacts.*

The concept of tiering is also useful. Tiering refers to the concept of a "multi-tiered" approach to preparing EIRs. The first-tier EIR would cover general issues in a broader program oriented analysis. Subsequent tiers would incorporate by reference the general discussion from the broader EIR, while primarily concentrating on the issues specific to the action being evaluated. Tiering is a method to streamline EIR preparation by allowing a lead agency to focus on the issues which are ripe for decision and exclude from consideration issues already decided or not yet ripe [Guidelines Section 15385].

Several commentators raised questions about the relationship of the Draft EIR for the Draft General Plan and the EIR for the Big Ranch Specific Plan and a future EIR for Stanly Ranch.

The Big Ranch EIR was certified and the Big Ranch Specific Plan was adopted October 22, 1996, after the October 4 release of the Draft General Plan and EIR documents. There are differences between the analysis and conclusions of the two EIRs. Some of the differences reflect the perspectives of different EIR preparers. In revising the DEIR for the General Plan, the environmental analysis and significance findings for Water Supply, Wastewater, Agricultural Land and Traffic were reconsidered and were modified.

Stanly Ranch is an important future development area for the City. The Draft General Plan Policy Document (page 1-7) requires that a specific plan be prepared for Stanly Ranch prior to its development. The specific plan will be the vehicle for resolving land use, infrastructure, safety, and open space issues at a detailed level. An EIR is being prepared to assess the environmental impacts of developing Stanly Ranch. The Stanly Ranch EIR will benefit from 1) having a clear project description , and 2) being able to focus on a smaller geographic area (See Standard Response Stanly Ranch).

STANDARD RESPONSE RUL

The Draft General Plan proposes expansion of the RUL in only four areas:

State Hospital

This 387 acre area is the largest area to be added to the RUL and is already within the City's Sphere of Influence, within the service boundary of the Napa Sanitation District and is served by City water. The institutional development on the property is urban in nature and inclusion in the RUL will enable improved coordination for City services (including fire and police) in the future. The Draft General Plan does not assign any new development potential to the State Hospital and assumes that it will continue as an institutional facility.

Foster Road Parcel

This 13 acre parcel of vacant land is bordered by incorporated land on the north, east and south sides. City services are available and the construction or extension of major facilities will not be required to serve the potential low density residential development that is projected to occur there. The RUL currently creates a conspicuous notch excluding this parcel and the proposed adjustment will create a more sensible edge (roughly along the watershed line) between urban and rural uses.

Trancas/Big Ranch

The current RUL boundary between the land on the northeast corner of Big Ranch Road and Trancas Street and the City is the center line of the roadways. The proposed adjustment will place the RUL along the Salvador Channel and its mature line of riparian vegetation which is a better defined, natural boundary and buffer between urban and rural development. This adjustment will encompass an approximately 40-acre site.

Trancas/Silverado Trail

This vacant approximately 5-acre site is located at the northeast corner of Trancas and Silverado Trail. This parcel has been incorporated land under the City's jurisdiction since 1973; it falls within Napa's Sphere of Influence; but it is outside Napa Sanitation District's Service Boundary. As a result of a lawsuit that followed a complex documentation process involving adjacent land, a superior court decision re-confirmed that this property is part of the City of Napa. Placing the RUL around this parcel allows for the RUL policies for properties adjacent to agricultural and open space lands to be applied to development of this parcel.

The Citizens Advisory Committee (CAC) received and considered several requests to include property within the RUL during their sessions in 1993. Several alternative scenarios for land use were examined and the CAC's Concept Report, including their preferred scenario, was presented to the City Council in late 1993. The City Council considered the information in the Concept Report, including the possibility of moving the RUL in several locations (to a greater degree than shown in the Draft Plan). The Council clearly expressed a desire to maintain the integrity of the RUL as a defensible boundary for city growth. On January 25, 1994 they confirmed the plan area that is presented in the draft documents as the RUL scenario that General Plan preparation should be based on. At that meeting, staff clarified the locations of RUL change that had resulted from prior discussions and the Council agreed that the proposed criteria for making these adjustments were logical and created a more defensible line based upon the natural boundaries such as ridges, drainage areas, creeks etc. The inclusion of the first three of the new areas reflects the land use scenario set out in the General Plan Concept Report. City Council endorsement

of this report provided the basis policy direction for the Draft General Plan. The fourth new area was added by the General Plan Draft Policy Document Addendum #1, released in November 1996. Inclusion of this parcel resolves inconsistencies between the RUL, the city limits, and Sphere of Influence.

First, the City does not consider the minor adjustments to the RUL proposed in the Draft General Plan to be a change of policy or growth inducing for several reasons. Over the last 20 years, City and County policies for confined city development have proven to be strong enough to confine urban growth within the RUL without comprising the viability of unincorporated agricultural land. The Draft General Plan perpetuates policies for compact urban growth that have been in place since 1975.

Second, other adjustments to the RUL have been made since 1975 to create a more defensible and sensible boundary and to bring urbanized county parcels within the service boundary of the City.

Third, the proposed RUL adjustments will accommodate only a moderate amount of new residential development and will reduce the pressure to make significant changes in the RUL in the near future.

Fourth, the City proposes the RUL changes to create a more sensible form for the city and establish a more defensible RUL boundary for the 25 year term of the plan to reduce the long term growth potential.

RUL Adjustments and Agricultural Land

The expansion of the RUL to include the four new areas has a very limited affect on high quality agricultural land. The following describes the agricultural characteristics of each of the four areas.

State Hospital: The 387 acre State Hospital site is essentially developed for institutional purposes and the General Plan does not assign any new development potential to the site. According to the U.S. Soil Conservation Service Capability Classification System, about 60 percent of the site is designated Class III and IV (non-prime) and the balance of the site is classified Class V - VIII (non-prime). The California Department of Conservation Farmland Mapping and Monitoring Program(FMMP), identifies the entire site as non-agricultural (i.e., a combination of "Urban/Built-Up Land" and "Other Land.")

Foster Road Parcel: This 13-acre parcel is bordered by incorporated land on the north, east, and south sides. According to the U.S. Soil Conservation Service, the parcel straddles the line between Class III and IV (non-prime) and Class V-VIII (non-prime). The California Department of Conservation's FMMP classifies much of the site "other land" (i.e. nonagricultural). The area is currently used for occasional grazing.

Trancas/Big Ranch: This 40-acre area is classified Class III and IV in the U.S. Conservation Service's system. The California Department of Conservation's FMMP classifies the southern 17 acres of the area as "Farmland of local importance" and the northern 23 acres of the site as "Farmland of Statewide Importance." Existing development consists of low intensity rural residential uses. Small portions of land are used for occasional seasonal plantings of corn, flowers, Christmas trees, etc.

Trancas/Silverado Trail: This 5-acre vacant parcel falls into Class I and II (prime ag. land) based on the U.S. Soil Conservation Service's System. The California Department of Conservation's FMMP classifies the site as "Prime Farmland." There is no agricultural development on the property.

The City considers the proposed RUL adjustments moderate and sensible as explained earlier in this Standard Response. The changes result in a more defensible line and affect such a small amount of agricultural land relative to the scale of the agricultural and open space setting that will remain protected outside the RUL. The agriculturally designated properties within the RUL adjustment areas are already parcelized in a pattern that

precludes significant and viable agricultural development in the future. This is not considered a shift in City Policy. (See also Standard Response Stanly Ranch).

Consistency with the County General Plan

Some of the comments in communication #13 from the County Counsel question whether the City's proposal to make minor adjustments to the RUL is consistent with the goals and policies of the County General Plan. The City believes, first, that the RUL adjustments are consistent with the County General Plan's goals and policies, and secondly, that there is no requirement that the City's General Plan be consistent with the County's General Plan. With respect to the County General Plan, which has a planning horizon to the year 2000, the City believes that the proposed RUL adjustments are consistent with the fundamental goals and policies for the confinement of city development within defensible urban boundaries and the ultimate protection of significant expanses of agricultural land within the county.

The following information found in the County's General Plan supports the City's proposal to adjust the RUL, particularly in areas that may have some agriculturally designated land.

The Introduction to the County General Plan, page ix, under "How to Use the Napa County General Plan", states *"Since the actual designation of land use areas as contained in the general plan is conceptual rather than parcel specific, some additional interpretation is required."* The text goes on to explain that the method for determining and refining land use boundaries is by *"reference to utilities and natural boundaries such as rivers, watersheds, soil types, and various terrain features as well as reference to railroads, highways and other man-made features."* It should be noted that the criteria for establishing the appropriate location for the adjusted RUL line use many of the same determinants.

The County's Land Use Map is more graphic in nature and is not of a scale to show the features listed above for refined definition of land use areas. The map shows generally the unincorporated areas of the county and designates virtually the entire valley floor as agricultural resource, excepting areas within the incorporated limits of the towns and cities. On the County General Plan Land Use Map, the north east corner of Big Ranch Road and Trancas appears to be designated agricultural resource; although the County delineation of the area does not appear to be consistent with the County General Plan criteria for defining land use boundaries.

City General Plan and RUL expansion areas were defined based on very site-specific considerations. The proposed adjustments to the RUL were considered based on criteria for establishing boundaries as defined in the County General Plan with a goal of creating a sensible and more defensible boundary for urban development for the next 23 years, in the interest of promoting the planned, orderly, efficient development of the area within the RUL.

The area at the northeast corner of Big Ranch Road and Trancas Street has urban development to the west and an intensely developed commercial shopping center directly across Trancas to the south. The only dividing line between these urban and county lands are two arterial roadways. Salvador Channel, on the other hand, creates a significant visual and physical boundary between this area on the City side and the intensely developed agricultural land to the north of the Salvador Channel Riparian corridor. The proposed RUL line would be more consistent with County General Plan criteria for determining appropriate land use boundaries than the current location of the RUL line.

For the reasons discussed in this response, the adjustments to the RUL will establish a sensible and defensible RUL boundary, consistent with the following five goals of the County General Plan:

Goal 1 To plan for agriculture and related activities as the primary land use in Napa County and concentrate urban uses in the County's existing cities and urban areas.

Goal 2 To develop and implement a set of planning policies which combine to define a population size, rate of population growth and the geographic distribution of that population in such a manner that the desired quality of life is achieved.

Goal 3 To determine what the land is best suited for; to match man's activities to the land's natural suitability; to take advantage of natural capabilities and minimize conflict with the natural environment.

Goal 4 To work with cities, other governmental units, citizens and the private sector to plan for services facilities and accommodations, including housing, transportation, economic development, parks and recreation, open space and other total county needs.

Goal 5 To implement the General Plan in every possible way to:

a) ensure the long term protection and integrity of those areas identified in the General Plan as agricultural, open space or undevelopable;

b) stimulate the development of those areas identified in the General Plan for residential, commercial and industrial.

The City disagrees with the assertion of one of the commentators that any conflict between City's Draft General Plan and the County's General Plan constitutes a significant impact. The City believes Appendix G(a) refers to situations in which a project is inconsistent with the general plan or some other environmental policy of the city or county with jurisdiction over the project. State law contains numerous requirements for consistency of projects with the *legally* applicable general plan and specific plan. In this case, the City of Napa has responsibility for adopting a general plan for its territory and surrounding planning area. The County has responsibility for adopting a general plan for all unincorporated territory. There is no requirement in California that a city's general pl2an be consistent with the county's general plan. There is no hierarchy among general plans. In general plan matters, cities and their surrounding counties are sovereign. Any conflict between any particular provision of the Napa Draft General Plan and the County's General Plan does not by definition create a significant impact.

Agricultural Land Conversion - Findings of Significance

The criterion of significance for agricultural land conversion (p.3.2-3) is that a significant impact would occur if the project would convert prime agricultural land to non-agricultural use or impair the agricultural productivity of prime agricultural land pursuant to *CEQA Guidelines*, Appendix G (y).

The DEIR has been revised to find conversion of prime agricultural land a significant impact.

RUL Expansion Criteria

Specific RUL expansion policies have been included in the Draft General Plan Policy Document in the Administration Chapter. Since there are currently no adopted criteria for modification of the RUL, the additional policy is intended to strengthen the City's ability to maintain the RUL integrity in the future. One of the criteria requires consistency with all of the findings of the County's Measure J which imposes severe restrictions on any changes to unincorporated land. These restrictions do not currently apply to the City since Measure J only addresses the County's General Plan. The RUL adjustments that are proposed with the Draft General Plan are to be considered along with the new policies for controlling the RUL, and together are intended to result in an RUL "package" with this General Plan that will be logical, and difficult to modify over the next 23 years.

STANDARD RESPONSE STANLY RANCH

Background

The following timeline clarifies the City's historic jurisdiction over the Stanly Ranch Planning Area:

1955 Golden Gate Avenue "cherry stem" and northernmost approx. 40 acres of Stanly Ranch annexed to city.

1964 Remaining southern acreage of Stanly Ranch is annexed to city and the site is zoned for residential use.

1968 General Plan designates Stanly Ranch for "waterfront oriented residential" (density undetermined). General Plan maps show Stanly Ranch within city-defined 10 year "Sphere of Influence" which was established before LAFCO was created.

1970 LAFCO adopts its first Sphere of Influence (SOI) for Napa which includes Stanly Ranch.

1972 LAFCO modifies Napa's SOI and excludes Stanly Ranch.

1975 Stanly Ranch included in the City's RUL when it is first established.

1975 General Plan designates Stanly Ranch for residential uses.

1982 General Plan designates Stanly Ranch as "Study Area", subject to further evaluation to determine specific land use designations.

1983 Golden Gate Avenue "cherrystem" deannexed because Stanly Ranch contiguity was accomplished with annexation of Napa Valley Corporate Park.

1991 Council authorizes cooperative planning effort between City and property owners to prepare a Specific Plan for Stanly Ranch.

1992 Council indicates preference for a mixed residential/resort type of development as basis for Specific Plan for Stanly Ranch after considering 3 alternatives during a study session.

1991-94 City departments and agencies provide input on issues related to development of Stanly Ranch.

1994 Property owners put hold on specific planning process.

1996 (September) Draft General Plan Released for Public Review

1997 (May) Draft Stanly Ranch Specific Plan submitted to City including General Plan Amendment and Rezone application.

The Stanly Ranch Planning Area is located at the southwestern edge of the city, primarily west of SR 29 and south of SR 12/121. This approx. 853-acre area was annexed to the city in two phases during the 1950's the 1960's, but has remained undeveloped and constitutes the largest single area of vacant land remaining within the RUL. It lies outside LAFCO's adopted Sphere of Influence for the City of Napa and the current service boundaries of the Napa Sanitation District. The 1982/86 General Plan designated this property as a "Study Area". In 1991, the City Council approved a cooperative planning effort between the property owners and the City to prepare a Specific Plan for Stanly Ranch. City staff's role was to participate in the identification of issues and technical requirements

for the Specific Plan. Based on work done prior to the 1996 release of the Draft General Plan, the planning area was given land use designations for a combination of uses and assumed these potential uses for traffic modeling and other environmental analysis purposes:

- **Tourist Commercial**, which includes destination-resort hotels and their recreational amenities, community and visitor-serving retail commercial, restaurants and similar uses.
- **Single Family Infill**, which provides for detached and attached single family homes, planned unit and cluster developments, and compatible uses.
- **Single Family Residential**, which allows a detached single family development pattern
- **Public Serving,** which provides for major parks and large areas of open space in private ownership; these lands may be subject to deed restrictions to maintain the land as open space. Lands within this designation may be used for outdoor recreation purposes, such as trails and related uses.

This combination of uses was not intended as a specific development proposal, but to provide a set of conceivable land uses that the Planning Area might generate as a planning component of the city and that could be analyzed in the General Plan EIR.

A Specific Plan application was submitted to the City on May 8, 1997 and the project and environmental review process has begun. As previously noted, the release of the Draft General Plan and DEIR (to which this discussion responds) occurred in Fall 1996. The Draft Specific Plan proposal for Stanly Ranch includes a high quality, destination resort community with the following components: a 45,000 square foot lodge with a ballroom, meeting rooms and restaurant, 300 guest cottages/resort homes, a spa and 18 hole golf course. The Draft Specific Plan also includes six residential neighborhoods with up to 540 market rate and 54 employee homes; a 40,000 square foot retail wine center with 40,000 square foot winery; and retention of 440+ acres of lowlands adjacent to the Napa River as open space. The proposal also provides for construction of a Bay Trail through the project and may include the offer a river trail easement. The Draft Specific Plan includes a detailed study of Stanly Ranch, the proposed pattern, distribution and intensity of development, proposed open space uses, infrastructure improvements, and a program of implementation. An Environmental Impact Report will be prepared as part of the Specific Plan.

General-Plan-Level Verses Specific-Plan-Level Environmental Analysis

Several commentators state that the General Plan DEIR either ignored or too briefly assessed the environmental impacts of development of Stanly Ranch. The DEIR does not ignore the Stanly Ranch and its potential impacts if and when it is developed. The DEIR analyzes the environmental impacts of the land use designations contained in the proposed Policy Document at the level appropriate for a general plan amendment. As provided by Section 15146(b) of the CEQA Guidelines, this analysis focuses on the secondary effects that can be expected to follow from the amendment of the Napa General Plan, but it need not be as detailed as the EIR that will be required for the processing of the Stanly Ranch Specific Plan. (See Standard Response Application of CEQA to General Plans.)

Agricultural Land Conversion

The Stanly Ranch has been within Napa city limits for more than 35 years and within the RUL since its inception in 1975. Given long-standing City policies to confine development within the RUL, there has been an expectation that eventually Stanly Ranch would develop with some non-agricultural or non-open space uses. In the meantime, Stanly Ranch has been used as grazing land and part of the property has been planted with wine grapes.

The agricultural potential of the Stanly Ranch is described according to several classification systems in the Draft General Plan Background Report:

- According to the U.S. Soil Conservation Service Soil Capability Classification System, Stanly Ranch and adjoining agricultural lands fall into Class III and IV (with Class I and II considered "Prime Agricultural Soils").

- According to the California Department of Conservation Farmland Mapping and Monitoring Program, Stanly Ranch is classified "Farmland of Local Importance", the third rank in the State's system behind "Prime Farmland" and "Farmland of Statewide Importance".

- According to the City of Napa's analysis of Department of Conservation Napa County Land Use Mappings, Stanly Ranch is classified "Resource Lands", the third rank behind "Intensive Agriculture" and "Non-Intensive Agriculture".

The criterion of significance for agricultural land conversion (p. 3.2-3) is that a significant impact would occur if the project would convert prime agricultural land to non-agricultural use or impair the agricultural productivity of prime agricultural land pursuant to CEQA Guidelines, Appendix G (y).

The conversion of Stanly Ranch to urban or urban and other open space uses does not meet the threshold of conversion of prime agricultural land to non-agricultural use and is therefore considered less than significant (I). Additionally, so as not to impair the agricultural productivity of any agricultural land outside of the RUL, General Plan policies require that urban/rural conflicts adjacent to the RUL be minimized through a combination of measures including agricultural buffers, progressively lower densities, etc. The Stanly Ranch EIR will analyze specific impacts of the proposed development pattern on adjacent agricultural uses.

Visual Quality

As noted above, Stanly Ranch is conceptually assumed to develop with a combination of uses including tourist uses, a golf course and recreational facilities, residential uses, and open space uses. Development of these facilities and uses will obviously change the existing view of the property to some extent; however, specific impacts are dependent on the proposed Specific Plan and must be examined at the specific plan level based on the details of the proposal.

Most of the development on Stanly Ranch would be screened from the view of residents and visitors entering the city from the south via the Southern Crossing by the extensive, mature eucalyptus windrows present on the Ranch. These same windrows would screen this development from the views of eastbound travelers along Highway 12/121 and southbound travelers along Highway 29/121. The one exception referenced above is the portion of the Stanly Ranch "panhandle" located on the east side of Stanly Lane. However, this area is likely to be developed with a wine center and winery, which would be entirely consistent with, and supportive of the scenic vistas and landscapes traditionally associated with the Napa Valley. Accordingly, the Stanly Ranch, once it is developed, will continue to serve as an appropriate and aesthetic gateway to the city of Napa.

The DEIR's criteria of significance for visual impacts (p-3.6-2) is that a significant impact would occur if the project:

- Conflicts with the adopted environmental plans and goals of the community; or
- Results in a substantial, demonstrable negative aesthetic effect, such as obstruction of a scenic vista or the creation of an acsthetically offensive site open to public view.

The Draft General Plan sets the City's environmental goals and policies, which call for integrating the urban environment with the city's natural features; as such it sets the policy framework within which the Specific Plan

must perform (p. 1-21 of the draft GP Policy Document) To the extent the Specific Plan must stay within the General Plan policy framework, and to the extent that the concept for development is highly unlikely to create an aesthetically offensive site open to public view, visual impacts are considered less than significant (I).

Public Facility Impacts

The General Plan sets the policy criteria for subsequent development proposals, requiring that adequate public facilities are available to serve new development; that all new development meet adopted service level standards, that new development pay its fair share, etc. (p. 4-2 of the Draft Policy Document). The Draft Stanly Ranch Specific Plan and its accompanying EIR will examine these issues in more detail and must show that these criteria are met. The General Plan DEIR analysis of transportation, water supply, wastewater, solid waste, and other facility impacts incorporated the conceptual development potential described for the Stanly Ranch in the Draft General Plan Policy Document.

Growth Inducing Impacts

Several commentators feel that designating Stanly Ranch for development is growth inducing (See County Counsels discussion of growth inducing effects; Comments 12.1 and 13.20). The City disagrees. As noted earlier in this response, Stanly Ranch has been part of the incorporated City of Napa since the 1960's and there has long been an expectation that it would eventually be subject to some level of urban development. The greatest limit on growth inducing impacts of Stanly Ranch development is the *confined city policy* implemented through the Rural Urban Limit (RUL) which has encompassed the Stanly Ranch since its inception in 1975. The very minor (mostly corrective) adjustments to the City's RUL over the last 20 years have demonstrated the effectiveness of both City and County policies in confining urban growth and resisting pressure to develop county agricultural and open space areas. The criteria for RUL modification will make it extremely difficult for city development to occur beyond the RUL within the time frame of the General Plan. *See Standard Response RUL.*

Alternatives Analysis

The DEIR considers a range of alternatives, including the "No Project Alternative". Comments 13.10 and 15.2 argue that the alternatives analysis is inadequate in not considering deannexation of Stanly Ranch.

Deannexation and the "No Project Alternative", which would retain Stanly Ranch as a "Study Area", are essentially the same alternative for Stanly Ranch since neither would allow any urban development in the area.

Use of the General Plan EIR for LAFCO Sphere Revision

The introduction to the DEIR describes the use of the DEIR and public agencies that will review the document. While Napa County LAFCO did review and comment on the DEIR, the City did not assume that the EIR for the General Plan would be sufficient environmental review for LAFCO's decision to expand Napa's SOI to accommodate Stanly Ranch. A sphere modification request for Stanly Ranch could be filed in conjunction with the Specific Plan; however, the City does not believe that a modification of the Sphere of Influence is necessary for the development of land already incorporated into the city limits.

Comment 15.2 cites two provisions of State LAFCO law (Government Code Sections 56300 and 56301) that the commentator feels may conflict with the inclusion of Stanly Ranch within Napa's sphere of influence. The City feels LAFCO could approve a sphere expansion for Stanly Ranch today consistent with the intent of Government

Code Sections 56300 and 56301.

Government Code Section 56300 charges LAFCO with the responsibility to encourage and provide for "planned, well-ordered, efficient urban development patterns with appropriate consideration of preserving open-space lands within those patterns. As described under the Standard Responses for RUL and earlier in this response, the city's jurisdictional authority over the Stanly Ranch was established when the land was incorporated in two phases in 1955 and 1964, prior to the creation of LAFCO and the adoption of any sphere of influence. The RUL policies have proven to be effective in maintaining the open space and agricultural uses outside of the RUL and to maintain a confined urban form.

Government Code Section 56301 establishes some of the purposes of LAFCO including the "discouragement of urban sprawl and the encouragement of the orderly formation and development of local agencies based upon local conditions and circumstances". The City believes that the fact that Stanly Ranch has been within the City limits for over 35 years constitutes an "existing local condition and circumstance" and that the RUL policies have protected adjacent agricultural land from the pressures of development and that these policies comprehensively and effectively address the issue of urban sprawl in Napa.

STANDARD RESPONSE BIG RANCH SPECIFIC PLAN AND EIR

The City of Napa approved the Big Ranch Specific Plan, associated general plan amendments, rezones and financing plan on October 22, 1996 (City Council Resolution 96-235), after the Draft General Plan EIR was released for public review on October 2, 1996. An environmental impact report was prepared and certified for the Big Ranch Specific Plan.

The approximately 430 acre Big Ranch Specific Plan Area (BRSPA) consists of incorporated land (about 334 acres) and unincorporated land (about 96 acres) located in the northeast corner of the city of Napa. The BRSPA is bounded by Trower Avenue (north), Big Ranch Road (east), Trancas Street (south), and Jefferson Street (west).

The BRSPA identifies development opportunities on about 300-acres of the BRSPA (defined as vacant or under-used lands); designates most of the area for residential use; provides for commercial, public/quasi-public, and agricultural, open space, and park uses; and retains the remaining 130 acres of existing uses.

The BRSPA provides for development at a variety of densities in order to accommodate different housing types, to ensure compatibility with adjacent development and to retain the character of existing residential areas while also permitting infill development.

Based on the Estate, Low-, Medium-, High-density residential designations contained in the BRSPA, buildout of the BRSPA could result in construction of approximately 889 new housing units. The BRSPA would not change density designations of built-out residential areas.

The BRSPA would not change existing public/quasi-public, office, general commercial, and neighborhood commercial land use designations except at two locations in the southeast corner of the BRSPA. The Land Use Plan reclassifies non-residential uses in the following areas (1982 general plan land use categories):

- About two acres at the Trancas/Big Ranch intersection would be redesignated for Neighborhood Commercial (NC) use. (Draft GP equivalent designation is LC)

- About five acres of Trancas Street would be redesignated for high density residential (RH-18) use. (Draft GP equivalent designation is MFR)

- About ten acres of Vintage Farm land would be redesignated from RL-6 to Public/Quasi-Public District (PQ). (Draft GP equivalent designation is PS)

- All 26 acres of the Queen of the Valley Hospital would be designated PQ, thus changing some non-PQ uses.

Addendum #3 to the Draft Policy Document has been prepared to incorporate the adopted specific plan land use designations and circulation revisions into the Draft General Plan. Land Use designations have been translated into the equivalent categories developed for the Draft General Plan. The Draft General Plan designation of BRSP-33 anticipated the eventual adoption of the Specific Plan and served as a place holder in the land use designations pending incorporation of the details adopted with the Specific Plan.

As noted in several comments, the Big Ranch Specific Plan EIR and Draft General Plan EIR reached different conclusions regarding the significance of several types of impacts. The Big Ranch Specific Plan Final EIR found that the Big Ranch Specific Plan will cause or contribute to six significant, unavoidable environmental effects:

1) cumulative traffic effects at the State Route 29/Trower and State Route 121/Trancas intersections;
2) secondary construction-related impacts from building water distribution facilities;
3) secondary construction-related impacts from building wastewater conveyance facilities;
4) water demand during drought conditions;
5) cumulative demands on water service during drought conditions; and
6) cumulative demand on wastewater treatment capacity.

The Draft General Plan EIR on the other hand found none of these impacts significant and unavoidable. Some of the differences reflect the perspectives of different EIR preparers. The environmental analysis and findings in the DEIR have been reconsidered in light of the Big Ranch Specific Plan and other relevant environmental documents. In the case of traffic, water supply, and wastewater, additional analysis has been added in the Revised DEIR and the conclusions about the significance of these impacts have changed.

STANDARD RESPONSE TRANSPORTATION

Significance Criterion

The following criteria are used in the revised DEIR to define the level of significance for traffic impacts:

- For freeway mainline sections and freeway ramps, the threshold level used in this analysis is LOS E, consistent with the criteria used by the County Congestion Management Authority (CMA). Facilities under the jurisdiction of the CMA in the City of Napa are the State Highways (12, 29, 121, and 221) plus Trancas Street. If a segment drops below LOS E, it is considered a significant traffic impact.

- The Draft General Plan establishes a minimum acceptable level of service for signalized intersections on arterial and collector streets at midrange LOS D. Midrange LOS D represents delays greater than 32.55 second per vehicle. It should be noted that for purposes of determining significance in the broader context of the General Plan, 2020 LOS levels that are slightly higher than midrange D are considered mitigated. Midrange LOS E would be permitted in the following areas:

  Downtown Napa within the area bounded by Soscol Avenue, First Street, California Boulevard and Third Street;

  Jefferson Street between Third Street and Old Sonoma Road; and,

Silverado Trail between Soscol Avenue and First Street.

- For unsignalized intersections, the minimum acceptable level of service recommended by the Draft Policy Document is midrange LOS E. Midrange LOS E for unsignalized intersections represents a reserve capacity of 49.5 vehicles per hour or greater and is considered restrictive for purposes of overall evaluation at the General Plan level. For purposes of EIR analysis, LOS F would therefore be considered significant. In the context of the General Plan, given the time frame and extent of variables, "unacceptable" at a single intersection does not constitute significance at the overall project level.

- For transit and bicycle facilities, a significant effect would occur if General Plan proposals and policies thwarted or diminished access to transit service or bicycle routes, eliminated routes, or did not support use of these alternative modes of transportation.

Mitigation and Findings Concerning Level of Significance

The Draft EIR found no significant traffic impacts; However, based on several comments on the Draft EIR and reconsideration, the findings of significance have been revised as follows:

With the improvements recommended in the General Plan, all but one signalized intersection would operate within or very close to the established criteria. The single intersection which would not satisfy the criteria, SR 221 at SR 29, is currently already operating at LOS F. The City's contribution to the intersection with the Draft General Plan is minor, making this a cummulative condition. Factors that cause this impact to be beyond the City's ability to mitigate are: 1) The intersection is outside of the City limits and the City's jurisdiction; and 2) The primary cause of the impact is traffic passing through Napa County between Solano and Sonoma County. The City will continue to participate in the CMA and coordinate with Caltrans and other jurisdications in an effort to address the traffic issues that occur on the 12/29 corridor, including the condition at the 221/29 intersection; but, because of the ongoing condition at this intersection, the impact has been recharacterized as a significant cummulative impact.

The City has also recognized that the source of funding for all projects that serve as mitigations in the General Plan is not guaranteed. The City, however, through its Capital Improvement Program, will endeavor to schedule and fund road improvement projects in response to the needs outlined in the policies and thereby adequately address the potential impacts related to future development. Regardless of the City's commitment to implement the necessary road projects, the uncertainty of funding affects the feasibility of mitigation and therefore this circumstance has been characterized as a potentially significant impact.

STANDARD RESPONSE WASTEWATER

NSD Planning Assumptions

NSD's 1990 Master Plan update was based on the following population projections for year 2012 (Sec . D.2.3):

Table 2.1
NSD Primary Service Area Population Projections
NSD-ACCWD Master Plan Update

Year	RUL[1]	Silverado[(2)] Country Club	Unsewered[(3)] Population in RUL	Total Sewered Population
1985	60,900	1,846	4,130	58,616
1990	64,500	2,195	3,397	63,498
1995	67,700	2,544	2,664	67,580
2000	72,500	2,544	1,932	73,122
2005	75,100	2,544	1,200	76,444
2010	N.E.[(4)]	2,544	N.E.[(4)]	80,000
2012	N.E.[(4)]	2,544	N.E.[(4)]	82,000

(1) ABAG 1985.
(2) Estimated at 2.4 persons per dwelling unit and 100 percent occupancy.
(3) Assumes 30 percent of 1985 RUL population outside of the City is sewered, increasing to 80 percent by the year 2005.
(4) N.E. = not estimated.

Excluding the Siverado County Club area, the plan assumed a population of approximately 79,500 within the RUL by 2012.

The Draft General Plan projects a 2020 RUL buildout population of 81,140, which is slightly lower than what the City of Napa's 1982 General Plan projected for the year 2012. With the reduced capacity of the new General Plan and the extended time frame, it is unlikely that Napa's RUL population would exceed 77,500 by the 2012, well within the planning assumptions used by NSD in its 1990 Master Plan update.

Planning and Financing Analysis

Several commentators suggest the City's General Plan DEIR should be providing detailed analysis of wastewater flows from existing and projected development both within and outside the RUL, the capacity of NSD facilities to accommodate those flows now and in the future, and the financial feasibility of developing Phases II and III improvements in the Sewage Treatment Master Plan.

The City of Napa rejects the assertion that the City is responsible for conducting such analysis for Napa Sanitation District's system.

Significance Criterion

The significance criterion for "wastewater treatment, storage, and disposal" has been revised and in the recirulated DEIR reads as follows: "A significant impact would occur if new development authorized by the General Plan generated wastewater flows that exceeded the existing or planned wastewater treatment, storage, and disposal capacity of the Napa Sanitation District system."

This criterion is essentially the same as the significance criterion used in Napa County's DEIR for the Napa County Airport Industrial Park: "A project would have a significant impact if it: [g]enerates additional wastewater that exceeds the existing or planned capacity of the sewage treatment and disposal system."

Mitigation and Findings Concerning Level of Significance

Clearly, wastewater flows from new development authorized by the General Plan cannot be accommodated by the existing NSD facilities and possibly cannot be accommodated by already planned NSD facilities. This is considered a significant impact. The City, however, understands that NSD will continue to plan, design, finance, and construct facilities adequate to meet the needs of NSD's entire service area.

To ensure that new demands from new City development will not exceed NSD's capacity, the City could require that all new applicants for development secure a "will-serve" letter from the Napa Sanitation District if the District notifies the City that a critical capacity situation exists. The City would not approve the new development without the "will-serve" letter. The addition of this mitigation measure would reduce the level of significance for wastewater impacts to less than significant (I).

Addendum # 7 to the Draft Policy Document has been prepared to incorporate additional language into Policy CS-10.3 to supplement its effectiveness as a mitigation measure. Revised Policy CS-10.3 will read:

> *The City shall coordinate development review with the Napa Sanitation District to ensure that adequate wastewater collection, treatment, and disposal facilities can be provided by the District by requiring that all new applicants for development secure a "will-serve" letter from the NSD if the District notifies the City that a critical capacity situation exists.*
>
> *Where a critical capacity situation does exist, the City shall not issue, in the absence of a will-serve letter from the NSD, any building permits or similar ministerial entitlements for proposed structures that would increase net demand on NSD treatment capacity. In addition, when conducting environmental review for proposed development projects requiring General Plan amendments, specific plans, use permits, tentative subdivision maps, or similar discretionary approvals, the City shall include within the environmental document, information assessing whether NSD is likely to have sufficient capacity to serve the proposed development.*
>
> *In approving any such discretionary project, the City shall require, as a mitigation measure and condition of approval, that the applicant(s) shall obtain the necessary will-serve letters from NSD prior to receiving approval of a final subdivision map, or in the absence of the need for a final subdivision map, prior to receiving approval of any required building permits or similar ministerial approvals.*

STANDARD RESPONSE WATER SUPPLY

SWP Entitlement Buildups

The City of Napa currently has sufficient water supplies during normal and wet years as indicated in the Water System Optimization and Master Plan (Adopted 11/18/97). Due to the City's increasing entitlement from the State Water Project (SWP) and the minimal increase in water demand from growth through the year 2020, the City does not have a shortage of water supplies in normal rainfall years. During drought years when water supplies from local sources are reduced and the City's SWP entitlements are cut back, the City faces a deficit in water supplies as do many other State Water Contractors. The City's current deficit during drought years is 4,200 acre feet of water assuming a reduction in SWP entitlements of 50% and a local reduction in water demands of 20% as a result of demand management programs which the City would implement during drought periods. The potential reductions in supply from the SWP is what causes the City to experience a drought year water supply shortfall. This existing estimated 4,200 acre feet deficit in drought years will reduce each year as the City' SWP entitlement increases and based on the current schedule of entitlement build up from the SWP, the City will have sufficient water supplies in both dry and normal years after the year 2012. The City's concurrent schedule of entitlement build up from SWP is greater than the City's water supply needs.

The City's water supply from the SWP was reduced by 80% in 1991 and by 55% in 1992 due to the drought the state experienced between 1987 and 1992. During this time, the City demonstrated that voluntary and mandatory conservation practices could achieve up to a 33% reduction in water demand. There was sufficient water to meet daily needs with only minor inconvenience and marginal loss of irrigated landscape. An 80% reduction from the SWP is considered severe and, for reasons outlined below, is not likely to occur again; but the City's ability to provide adequate water supply during severe drought conditions has been demonstrated.

Based on the experience gained from the last drought, the Department of Water Resources (DWR) has adjusted how the SWP is operated. Prior to 1991 DWR had never experienced multiple years of drought and were therefore hesitant to cut back deliveries in dry years. They are now operating the State Water Project very differently. Since 1992, the Department of Water Resources has begun each year with reductions in entitlement until rainfall and snow fall is adequate to ensure delivery of full entitlements to each State Water Contractor. This change in operation will result in more years when the City will experience small cut backs in its entitlement deliveries from the SWP, but will also result in less severe cut backs in any single year due to the more cautious management of the State's water supplies. This management approach will improve the City's water supply reliability because in normal and wet years the City has excess water supplies and currently only experiences a deficit if SWP entitlements are reduced more than 25%.

The City is able to reduce the impact of SWP entitlement cutbacks by taking advantage of Interruptible Entitlement water deliveries that are often available in wet Winter months when there are excess flows within the Delta. These excess flows are a result of uncaptured runoff from the tributaries to the Delta. Delivered water from these excess flows are not considered entitlement deliveries, allowing the City to take more water than the allocated SWP entitlements in any given year. Interruptible Entitlements are unpredictable, but were available in 1991 and 1992 which were the worst years of the drought. Napa County water agencies with SWP entitlements were able to take 676 acre feet of Interruptible Entitlements in 1991 and 1,058 acre feet in 1992 over and above the normal SWP entitlements. This reduced the impact of SWP reductions in entitlement deliveries significantly. Solano and Napa County water agencies have been able to take advantage of Interruptible Entitlements because the location of the SWP's North Bay Aqueduct and where it connects to the Delta allows these agencies to benefit from these excess flow conditions in the Delta long before other State Water Contractors. The amount of water supply available in dry years from Interruptible Entitlement deliveries is difficult to quantify, but is available in most years to the City and improves the reliability of the SWP.

The Monterey Agreement

Recent agreements by the State Water Contractors has also resulted in improving the reliability of the SWP. The State Water Contractors drafted the Monterey Agreement in 1995 which has recommended changes in the SWP contracts to allow contractors to more easily enter into water transfer agreements and make adjustments to their entitlements and their entitlement build up rate. While the Monterey Agreement in its entirety has not yet been implemented, a final environmental document has been certified and many of the provisions are being implemented by DWR. This has also increased the SWP reliability by allowing State Water Contractors to better manage their water supplies. The City has requested the Napa County Flood Control and Water Conservation District (NCFCWCD) contact DWR on the City's behalf to pursue the acceleration of the City's SWP entitlement to the City's full amount of 18,800 acre feet. The City would satisfy its drought year water supply needs by accelerating to the full entitlement amount. The City's existing SWP entitlement is 6,600 acre feet (1997) and increases by approximately 400 to 500 acre feet per year until it reaches 18,800 acre feet in the year 2021. When DWR cuts back deliveries of entitlements, it reduces the delivery by a percentage of the State Water Contractors current year entitlement. The City currently has a very slow build up of entitlement through the year 2021 when the City's entitlement reaches it full amount. Many other State Water Contractors have already reached or will reach their full entitlement much quicker than the City of Napa. The City will improve its water supply reliability by accelerating this build up of entitlement because the SWP reduces deliveries in dry years by a percentage of State Water Contractors entitlements. With a larger entitlement the City will receive more water in dry years because the reductions in deliveries will be a percentage of a much larger number resulting in a greater supply of water. Accelerating the City's SWP entitlements will not result in the need for additional physical improvements to the City's water system or the SWP.

SWP Drought Water Bank

During the recent drought DWR developed an emergency drought water bank by purchasing water from the agricultural community and various agencies that had excess water available. This water was then made available for purchase by State Water Contractors. The program was well received and was so successful that in both 1991 and 1992 DWR was able to secure more water than was purchased from the drought water bank. The City of Napa did not take advantage of these water supplies because the City was able to purchase drought water supplies from Yuba County Water Agency. DWR has recently formalized the State Drought Water Bank program and has certified an environmental document (November, 1993) making plans to implement the water bank in future years to provide drought water supplies to State Water Contractors. This is another very viable option available to the City in the event another severe drought occurs.

Other SWP Drought Year Projects

Since the recent drought, the State Water Contractors have been meeting with DWR and actively encouraging the development of additional water supplies to increase the reliability of the SWP during drought years. DWR is currently pursuing two dry year water supply projects. The first is called the American Basin Conjunctive Use Project which will develop approximately 55,000 acre feet of additional water supplies in dry years (Pre-Feasibility Report, American Basin Conjunctive Use Project, February 1995). DWR solicited interest in this project and the NCFCWCD has contacted DWR on the City's behalf indicating interest in the project. The NCFCWCD has indicated to DWR that the SWP subcontractors in the county of Napa are interested in 2,800 acre feet of the 55,000 acre feet the project would potentially yield.

The second project being investigated by DWR is titled "State Water Project Supplemental Water Purchase Program" and is a project pursuing the development of a dry year water purchase program where contracts with various agricultural interests and other agencies would be developed allowing for the purchase of water supplies

during years when the SWP could not deliver full entitlements to all State Water Contractors. This project would potentially provide DWR with 400,000 acre feet of dry year water supply that would be available to State Water Contractors for purchase in dry years. DWR has prepared and distributed a draft environmental document covering the project titled "State Water Project Supplemental Water Purchase Program, Draft Program Environmental Impact Report, State Clearinghouse 94082033". Both of the projects listed above are options identified in the Draft Water System Optimization and Master Plan that are viable water supply alternatives available to the City to increase drought year water supplies. The referenced environmental documentation regarding these SWP programs are available for review at the City of Napa Public Works Department, 1600 First Street, Napa, CA.

Reclaimed Wastewater

Another option to improve the City's water supplies identified in the Water System Optimization and Master Plan is the utilization of reclaimed waste water to offset current potable water supplies currently being used to irrigate parks, a golf course, and other landscaped areas within the City. The City is currently negotiating terms of an agreement to allow the Napa Sanitation District to deliver reclaimed waste water to certain special City water customers to reduce the amount of potable water supplies used for irrigation purposes within the City's water service area. The area being proposed by the City and the Napa Sanitation District for the use of reclaimed waste water is the area south of Imola Avenue, east of the Napa River, and west of State Highway 221 (including the Napa State Hospital property), the south Napa Market Place, the Stanly Ranch, and the property owned by the Napa Sanitation District adjacent to Imola Avenue bordering the Napa River. It is proposed to off set the use of potable water used for irrigation of turf areas such as the Kennedy Golf Course, Kennedy Park, and the Napa Valley College. The use of reclaimed water in this area could off set approximately 400 acre feet of potable water being used currently for irrigation of landscaping and off set future development in this area that would otherwise use potable water from the City for landscape irrigation.

Significance Criterion

The significance criterion for water supply and delivery has been revised in the recirculated DEIR to read as follows: "A significant impact would occur if new development authorized by the General Plan increased water demand that exceeded the available existing or planned supply of the City of Napa Water System."

This is essentially the same as the significance criterion used in Napa County's DEIR. on the Napa County Airport Industrial Park: "A project would have a significant impact if it increases the demand for water that exceeds the available supply or the planned supply of the water system."

Mitigation and Findings Concerning Level of Significance

Historical annual water production by the City over the last 25 years has ranged between about 10,400 and 15,200 acre feet. Annual use of City water production during 1989 to 1994 ranged between about 10,400 and 14,100 acre feet. The Water System Optimization and Master Plan has predicted that annual water usage for the City of Napa Water System will be almost 16,600 acre feet (in normal water years) by the year 2020. In addition, water demand by other entities that are at times supported by the City system (i.e., Calistoga, Yountville, Yountville Veteran's Home) will add an additional 1,460 acre feet to the total demand (Water System Optimization and Master Plan Volume I-Executive Summary, 1996).

Projected water yield in the year 2020 is expected to be approximately 35,200 acre feet (in normal water years). In drought years, the City of Napa Water System demand is expected to be approximately 13,300 acre feet (a 20% reduction of projected demand), while the projected drought year water yield of the City system is expected to be

9,100 to 14,800 acre feet. Therefore, the City of Napa faces a potential water deficit in firm yield during drought years of its supply capacity to meet current annual demands and projected future demands through the year 2012. This estimated deficit is contingent on the estimated firm yield for the local supply sources and the NBA. On an annual basis, the deficit appears to be in the range of 2,500 to 4,200 acre feet for current conditions with the deficit reducing each year until water supplies match the City's demand for water in drought years in the year 2012. From 2012 to 2020 the City has sufficient water supplies to meet drought year demands.

As described above under the Monterey Agreement, the City has submitted a request to the State of California to modify its Table A entitlements for NBA water, which would enable the City to meet water demand during drought periods by accelerating full achievement of the City's SWP entitlements to 1997 rather than 2021. Approval of this proposal by the SWP would result in a less than significant impact.

However, at this time, the proposal has not been officially adopted by SWP. If the Table A entitlements for NBA water are not accelerated as proposed, or a combination of other supply options are not established, the City cannot guarantee water delivery for either the current or future water demand during drought year conditions. The other options from the SWP for water supply during drought years include the Drought Water Bank, American Basin Conjunctive Use project, the State Water Project Supplemental Water Purchase program. A combination of these programs and/or acceleration of the NBA entitlement could be relied upon to provide for the projected drought year deficits through an adopted program and contracts that provide certainty for delivery. Until the city is able to secure a certain and guaranteed water source during drought year conditions there is a potentially significant impact. A mitigation for this potential impact has been proposed in the form of an additional General Plan policy that would require the city to monitor building permits (new water system hook-ups) and to limit permits if necessary in order to guarantee drought year water supplies to existing and proposed development until such time as a guaranteed drought year water supply is secured. New language will be added to the Community Services Element Policy CS-9.3 to supplement its effectiveness as a mitigation as follows:

> *The City of Napa shall determine the firm yield available from existing and future SWP water supply sources and shall monitor, and if necessary, limit growth (new water system hook-ups) in order to guarantee drought year water supplies to existing and proposed development. Growth shall be limited as follows:*
>
> *1) The City shall not issue any building permits or similar ministerial entitlements for proposed structures that would increase net potable water consumption in the City or its service area in the absence of a letter from the Department of Public Works stating that approval of the permit or other entitlement will not adversely affect the City's ability to adequately serve the public health and safety needs of all of its water customers during drought conditions.*
>
> *2.) In addition, when conducting environmental review for proposed development projects requiring General Plan amendments, specific plans, use permits, tentative subdivision maps, or similar discretionary approvals, the City shall include within the environmental document information assessing whether the City and its water suppliers are likely to have sufficient water supplies to adequately serve the proposed development and all other City water customers during drought conditions. In approving any such discretionary project, the City shall require, as a mitigation measure and conditions of approval, that the applicant(s) may not receive a final subdivision map or in the absence of the need for such a map, may not receive building permits or similar ministerial entitlements in the absence of a letter from the Department of Public Works stating that approval of the map, permit or other ministerial entitlement will not adversely affect the City's ability to adequately serve the health and safety needs of all of its water customers during drought conditions; and, that there will be sufficient water to serve the basic health, hygiene, and fire suppression needs of the community..*

> *When contracts are modified or are executed with the SWP to secure additional reliable water supply for drought years or other dependable and adequate sources are guaranteed, the requirement to limit growth in the manner described above can be suspended.*

The addition of this mitigation measure should reduce the level of significance for water supply during drought to less than significant; however, since water supply is ultimately dependent on several factors of nature which are out of the City or State Department of Water Resources control, drought year water supply remains uncertain for all water purveyors in California. As such, this impact is still considered potentially significant, even after mitigation.

Further Discussion of "Significant" Water Supply Impact

As described above, the City has decided to revise the impact conclusions in the Draft EIR related to water supply during drought times; however, based on past experience the City has demonstrated that there is sufficient supply, when combined with conservation practices, to ensure that there will be adequate water to preserve the health and safety of the citizens of Napa. In order to clarify the term "potentially significant" used in the conclusion above, the drought impact would consist of a loss of landscaping due to landscape irrigation cut backs and a certain level of inconvenience to citizens as they implement conservation practices in daily living. The "potentially significant" impact identified above is not an impact to the public health and safety; there will be sufficient water to serve basic health, hygiene and fire suppression needs of the community.

The City of Napa has a proven record of providing sufficient water during severe drought year conditions as experienced throughout the State in the early 1990's. In 1991 the City implemented mandatory water conservation measures and reduced water consumption by 33%. The City was able to reduce consumption without a threat to pubic health, or too much inconvenience to consumers, primarily by reducing the consumption of water for landscape irrigation. This maintained a dependable water supply for indoor needs.

The following example of how water is consumed in Napa is helpful in understanding why the drought year water supply is not as critical as the strictly analytical data conclude. The City's 1996 water demand, excluding landscape irrigation, was 8,250 acre feet. The City's water demands for indoor needs without a substantive change in customer habits is approximately 50% of the City's annual water demand. The actual percentage of indoor water demand necessary to meet the "critical" health and safety needs of the citizens is not specifically known; however, it is likely to be much lower than 50%. For purposes of analysis, it has been assumed that it would not be desirable to ever allow water supplies in the City to be reduced below 50% of normal annual demand. This would allow some landscape irrigation and provide adequate indoor water supplies with limited inconvenience to citizens. The City has a demonstrated conservation "buffer" of 33% percent which, theoretically, could offset a water supply reduction of 80% (As successfully implemented during past SWP cutbacks of up to 80%). As discussed in this standard response, the City has many alternatives for acquiring additional water to make up the deficit after the conservation buffer is added back to the cutback. In reality, the additional water supplies would be needed in order to offset the "inconvenience" of a drought but not to satisfy "critical" indoor water needs. Any combination of the potential water supplies listed in this standard response could meet the City's current dry year water supply needs, but none are necessary to meet the City's critical water needs for the health and safety of the residents.

Eventual implementation of the programs described in the Water System Optimization Master Plan will address this issue. The availability of these programs make it possible for the City to resolve drought year water supply deficits well before the year 2012. For this reason, regardless of the revised environmental conclusion above, the City feels that the true potential for a significant impact is extremely slight.

STANDARD RESPONSE FLOOD CONTROL

Page 8-19 through 8-26 of the Draft General Plan Background Report provides a history of Napa River Flooding and an overview of regulations that have been applied to protect public health and safety. Background discussion also includes a history of flood control planning in the City of Napa. This information is condensed on pages 8-9 through 8-12 in the Health and Safety Element of the Draft General Plan Policy Document and is followed by policies formulated to achieve Goal HS-3 "To reduce the risk to life and property from flooding".

In addition to the Health and Safety concerns related to flooding, the City has recognized the opportunities that a river amenity offers to the city and the Draft Policy Document addresses the need for improving the urban relationship this important feature as follows:

- Policies LU-1.7, 6.4, 6.5, 6.6, 6.10, 9.1, 9.2, 9.3 and 9.6 in the Land Use Element;
- Policies PR-1.2, 1.5, 3.1, 3.4, 3.8, 5.1, 5.2, 5.7, 5.12, and all of the Policies under Goal PR-6 in the Parks and Recreation Element related to access, recreation and open space qualities along the Napa River.

The City also recognizes that the health of the river is an important aspect of its biological relationship with the region as a supporting habitat for wildlife and a component of the City's scenic, open space qualities. Policies in the Community Services and Natural Resources Elements of the Draft General Plan support the maintenance and protection of the Napa River resource as follows:

- Policies related to storm drainage under Goal CS-11 in the Community Services Element;
- Policies NR-1.1 through 1.13, NR-3.3, and NR -4.1 through 4.3 in the Natural Resource Element.

Several comments that are focused on the Napa River as a resource are specifically responded to in this document relative to the respective detail of the comment. Comments that are related to the Napa River and the Flood Control Project Design relationship with the General Plan update process (particularly from comment letters 2, 3, 14, 24 and 25) have been consolidated in this standard response.

History of the Flood Control Project

The Napa River Flood Control Project was authorized as a federal project in 1965 but early studies met with considerable resistance from local citizens. In 1975 a project design was developed incorporating local issues of concern. In 1976 a referendum to determine the acceptability of the flood control project narrowly passed, but a subsequent referendum in 1977 opposing the project passed and the project was placed on inactive status.

Following the 1986 flood event, the Napa County Flood Control and Water Conservation District petitioned Congress to reactivate the flood control project. In response, the Army Corps of Engineers prepared an action plan and began engineering design studies in 1989. The Corps, as the responsible lead agency, subsequently prepared a set of studies and a Draft EIR which were available for public comment until May 1995. The design consisted of levees, setback floodwalls, sheetpile walls, streambank protection, channel excavation, and a bypass channel; it was accompanied with maintenance and hazardous materials remediation. This plan experienced significant public and agency comment regarding the visual impacts, loss of recreational opportunities, other environmental impacts, and general insensitivity to the River's design relationship to the urban environment. In response, the Corps agreed to engage in a "Two Track Design Concept". Track 1 proposed that the Corps revise the construction plans and respond to the concerns raised during public review of the DEIR; and, Track 2 proposed the establishment of a Technical Design Committee to study alternatives such as watershed management, dams, alternatives to flood walls, and opportunities for river restoration under the guidance of a Community Coalition.

Community Coalition Process

The Coalition was established as a Tri-party organization of fifty or more people consisting of Chamber of Commerce, NVEDC and the Friends of the Napa River. Members included community leaders, residents, public agency staff and professional consultants and other experts who volunteered their expertise on special support teams throughout the process. Over a 17 month period they conducted extensive review and revision of the Corps design and have developed a geomorphic design which promises a "living river" concept by integrating flood management with environmental and urban design issues. Work has been closely coordinated with state resource agencies to achieve an environmentally sound design.

The Community Coalition and Corps presented the results of their comprehensive re-design of a flood management project to the public on May 9, 1997. The revised project is intended to achieve the following objectives:

- Creation of a plan that provides 100 year flood protection from Napa River flooding within the urbanized areas of Napa.
- Creation of a plan that incorporates elements of a watershed management strategy beyond the Project boundaries that makes geomorphic, environmental, management and economic sense.
- Creation of a plan that embraces and incorporates the elements of a living restored river.
- Creation of a plan that makes economic and financial sense to the Napa County community as well as to the State and Federal governments.
- Creation of a plan that incorporates sound urban design principles and design excellence, that both expresses the community's unique physical, cultural, and historic aspects an which incorporates the River Project into the fabric of the community.

The revised plan appears to meet the objectives of flood damage reduction, eliminates the primary concerns of the previously developed plan, and would provide significant incidental environmental quality outputs.

Status and Timing of Flood Control Planning

Since the May 1997 presentation , the flood control participants have been endeavoring to determine the means for funding the local share of the project. A decision has been made to place a 1/2 cent local sales tax proposal on the March 1998 ballot for voter approval. The tax will be a special tax and will require a 2/3 vote in order to pass. The Army Corps of Engineers is finalizing their project design and completing a Draft Supplemental Environmental Statement/Environmental Impact Report which is anticipated to be release for public review and comment on December 15, 1997.

When environmental review and design details are completed, the project is subject to certification by the County Board of Supervisors (acting as the Flood Control District Board of Directors) and is also subject to endorsement by each of the jurisdictions affected by the project.

Relationship to Draft General Plan Process

The flood control re-design process was underway at the time the Draft General Plan Documents were released for public review in October 1996. Several participants in the Coalition, including the Friends of the Napa River, commented that the DEIR for the Draft General Plan did not include the latest objectives developed by the group for the flood control design and that the General Plan was not organized to focus policies on river related issues. Since the referenced flood control project design has not been funded or adopted by the City it would be premature to include the detailed objectives into the General Plan at this time. Pages 8.25 and 8-26 of the Background Report, in concert with the supplemental text in this response, provide sufficient discussion of the status of the flood control project as a framework for development of the General Plan at this time. The draft General Plan is intended to provide long range planning for the City with or without flood control. If a flood control plan is adopted and funding becomes a certainty, the Council may wish to amend the General plan to incorporate supporting policies and implementation programs as suggested. It would be premature to anticipate an appropriate policy solution in the General Plan before a flood control project is a certainty.

Some comments focused on the Natural Resource objectives of the Flood Control Project referencing, again, the objectives of the "living river" concept. As mentioned above, the General Plan can be amended in the future to reflect the objectives and programs of an adopted project if the Council desires to do so. None of the draft General Plan policies preclude the implementation of a flood control design. Environmental protection policies are included in the Natural Resource, Land Use, and Health and Safety elements of the Draft General Plan to address riparian habitat, water quality and other issues that would enable the implementation of a living river strategy and support adoption of a future flood control project.

RESPONSES TO INDIVIDUAL COMMENTS

1. Napa Chamber of Commerce
October 15, 1996

1.1G Commentator recommends the General Plan include an Economic Element.

Response: The City of Napa has included funding in the Fiscal Year 1997-99 Budget for the development of an Economic Element for the General Plan and intends to proceed with its implementation in FY 1997-98.

2. Friends of the Napa River
October 17, 1996

2.1G Commentator recommends General Plan incorporate guidelines for urban waterfront development prepared by Friends of the River.

Response: The Redevelopment Agency/City has begun the process of preparing design standards and guidelines for the areas between Imola and Lincoln, Silverado Trail and Main Street and Soscol Avenue in FY 1997-98. The Urban Waterfront guidelines prepared by the Friends of the Napa River will be reviewed and considered in the preparation of the design standards. This is an implementation of Policies LU-6.4, LU-6.8, LU-6.9, LU-6.10 on page 1-18 of the Draft Policy Document.

2.2G Commentator recommends General Plan include a special appendix summarizing all policies and programs in the Plan relating to the Napa River watershed.

Response: Although not needed for General Plan adequacy, a special Policy Document Appendix under a category of special interest could be considered by the City Council. It should be noted that this type of appendix repeats the policies found in the Elements and creates a larger policy document.

2.3G Commentator expresses concern that creeks are being impacted with additional storm water run off created by new development and supports keeping creeks open. The comment also asks what regulations govern development in the floodplain and whether these regulations should be made clearer.

Response: Table LU-2 on Page 1-14 of the Background Report summarizes existing land uses and vacant land available for development. It is assumed that there is infill development potential on both the vacant and the underutilized parcels within the RUL. Many of these sites are surrounded by existing development and are served by an existing underground storm drain network. Policies in the Draft General Plan (both Land Use and Natural Resource Elements) will support the concept of preserving and utilizing natural systems to reduce the impacts of new runoff on existing storm drain systems where new project sites are of a scale to feasibly integrate these techniques. Examples of recent projects which

incorporate retention ponds are the South Napa Marketplace and Silverado Creek. With regard to floodplain development, City Ordinance Chapter 17.62 and Policy Resolution No. 27 establish Floodplain Management Regulations and require grading and drainage plans minimizing stormwater impacts for individual project proposals.

2.4E Commentator refers to the DEIR page 3.7-8 # 3 and expresses concern for the ambiguity in interpreting Land Use Policy 9.3 and related policies.

Response: The policies referenced in the DEIR are listed under Goal LU-9 in the Land Use Element. This goal recognizes the environmental setting and natural resources that remain in the city and that the urban form should remain flexible in responding to the constraints and opportunities presented by the remaining resources. The policies are intended to allow flexibility in setting standards for development when environmental information demonstrates that important resources are present. As stated in the first two paragraphs on page 2 of the Policy Document, state law requires that actions and decisions concerning both private and public projects be consistent with the policies of the General Plan.

2.5G Commentator feels the narrative description of natural resource and flooding issues is better than the related policies.

Response: There is no reference to specific text or policies in this comment, making a direct response difficult. If the commentator has specific suggestions for modifying the policies in question, these should be presented to the City Council for consideration during hearings on the Draft General Plan.

2.6E Commentator questions the changes proposed for the Stanly Ranch, the potential for significant impacts and requests that the floodway areas of the Stanly Ranch be considered open space.

Response: *See Standard Response Stanly Ranch.* The Stanly Ranch is not being "rezoned" by the General Plan. The text in the last paragraph on page 1-7 of the Draft General Plan Policy Document states that "Prior to any development in this Planning Area [Stanly Ranch], a specific plan is required." The Specific Plan process will involve a comprehensive review of a development proposal and its related environmental impacts in an EIR before any final decision on the distribution of land use through zoning is made.

2.7G Commentator asks why there isn't a conservation element for maintaining, enhancing, restoring, and *creating* riparian and wildlife corridors?

Response: Conservation policies are included in the Natural Resource Element that address vegetation types and wildlife habitat corridors. Goal NR-1 (pg. 7-4) is focused on managing natural resources and preserving and enhancing plant and wildlife habitats. Policies NR1.1 through NR-1.13 are intended to provide for the maintenance, enhancement, restoration and creation of riparian and wildlife habitat and corridors and the Implementation Programs on pages 7-5 and 7-6 indicate that the City is intending to undertake certain tasks within the next 5 years to implement these conservation policies. Policies in other elements also incorporate conservation practices in recognition of the policies in the Natural Resource Element. For example, Land Use policies for maintaining the RUL are intended to conserve resource, open space and agricultural lands in the unincorporated areas of the County; The Land Use Designations and densities for residential development represent a reduction in density in certain areas as a result of site specific analysis of environmental constraints during General Plan data collection; Goal LU-9 on page 1-21 and its related policies specifically recognize the need for the urban pattern to respond to the environmental setting and natural amenities because they enhance the livability of the city.

3. Friends of the Napa River
October 18, 1996

3.1G Commentator submitted guidelines inadvertently left out the packet accompanying the October 17th letter (comment letter 2).

Response: *See Standard Response Flood Control and Response to Comment 2.1G.* Guidelines are noted and attached to Comment Letter 2. The policy recommendation that the guidelines be incorporated in the General Plan can be presented to the City Council during hearings on the Draft General Plan.

4. Napa Chamber of Commerce
October 15, 1996

4.1G Commentator acknowledges the need to proceed with the General Plan as scheduled but seeks a budget commitment for an Economic Element prior to the adoption of the General Plan so that such an element can be prepared and added to the Plan soon after its adoption.

Response: *See Response to Comment 1.1G.*

5. Louise Clerici
October 28, 1996

5.1E Commentator points out apparent conflict between the Draft EIR for the General Plan and the EIR for the Big Ranch Specific Plan concerning the impacts on future water supply.

Response: *See Standard Responses for Water Supply, CEQA Applications to General Plans and Big Ranch.* The two documents do have conflicting environmental conclusions regarding water supply and reflect the interpretation of two different environmental consultants. The General Plan DEIR has been revised to expand the analysis of water supply impacts to find water supply impacts potentially significant during times of drought.

5.2E Commentator points out apparent conflict between the Draft EIR for the General Plan and the Draft EIR for the Big Ranch Specific Plan concerning the significance of impacts on future wastewater treatment capacity.

Response: *See Standard Response Wastewater.* The two documents do have conflicting environmental conclusions regarding wastewater treatment capacity and reflect the interpretation of two different environmental consultants. The General Plan DEIR has been revised to find wastewater treatment capacity significant based on the existing NSD facility; however, the City is proposing an additional mitigation in the form of a policy that would require that all new applicants for development secure a "will-serve" letter from the NSD if the District notifies the City that a critical capacity situation exists. The mitigation would reduce the impact to less than significant.

5.3E Commentator asks for clarification of DEIR Figure 2-2 concerning the designation of two areas.

Response: The two areas in question as shown on Figure 2-2 of DEIR are both county parcels within the RUL but located outside the sphere of influence; therefore, both the shading and vertical line treatment shown in the legend have been applied.

5.4E Commentator asks who is proposing to extend the RUL?

Response: *See Standard Response RUL.*

5.5E Commentator points out apparent conflict between statements in the DEIR that reference the amount of available acreage for future development in the RUL.

Response: An inventory of land use in the RUL was conducted by planning staff in 1992. The inventory was conducted on a parcel by parcel basis and land was categorized as shown on Table LU-2 in the Background Report. At the time, small parcels of vacant land and developed parcels with additional development capacity were inventoried in a separate category from short term agricultural uses (parcels over one acre with at least one existing dwelling). As stated in paragraph 3 on page 1-15 of the Background Report: "When land in short term agricultural use is factored in, several additional sites are added to the inventory of "vacant" lands potentially available for development." Table 1-1 on page 1-3 of the Policy Document estimates the combined total of underdeveloped and agricultural land area currently existing in the RUL. The text in question on page 3.6-2 of the DEIR refers to the visual character of infill development. In this case, the reference to 858 (438 considered developable) acres of vacant land is appropriate since it represents vacant "infill" land surrounded by existing development. The text on page 3.9-3 of the DEIR uses the combined estimated vacant land figure of 1,037 acres within the RUL for the purposes of evaluating the potential impacts to groundwater recharge, an environmental category that requires a theoretical estimate of additional impervious surface that might result from new development in the RUL.

5.6E Commentator points out that the DEIR erroneously references Table NR-1 in the Draft General Plan Background Report.

Response: The text of the DEIR has been revised to correctly reference only Tables NR-2 and NR-4.

5.7E Commentator suggests simplified page numbering system for DEIR.

Response: The suggestion is appreciated; however, the page numbering system used in the DEIR and in the General Plan Documents is used in these type of reports to assist the reader in tracking the chapter, page, and, in some cases the subject matter for reference purposes.

6. California Department of Forestry and Fire Protection (CDF) October 14, 1996

6.1E No Comments submitted on DEIR

Response: No response necessary.

7. Napa Valley College
November 12, 1996

7.1G Commentator points out that the Draft General Plan Background Report does not show enrollment trends for Napa Valley College.

Response: The Draft Background Report will be revised to include the following information provided by Napa Valley College:

NAPA VALLEY COLLEGE ENROLLMENT TRENDS - 1990 to 1996

Semester/Year	*Students*	*% Change*
Fall 1990	6,991	--
Spring 1991	7,062	1.0%
Fall 1991	7,328	3.8%
Spring 1992	7,243	-1.2%
Fall 1992	7,102	-1.9%
Spring 1993	6,319	-11.0%
Fall 1993	6,248	-1.1%
Spring 1994	6,264	0.3%
Fall 1994	5,932	-5.3%
Spring 1995	6,074	2.4%
Fall 1995	5,669	-6.7%
Spring 1996	6,104	7.7%
Fall 1996	5,767	-5.5%

Source: Napa Valley College 4/30/97

7.2G Commentator asks for clarification regarding the number of high school students attending community college in Table CS-8.

Response: The Draft Background Report will be revised to include the following information:

- 441 students were enrolled in both a local high school and Napa Valley College in Spring 1997
- 298 students that graduated from a local high school went on to attend Napa Valley College in 1996

8. Metropolitan Transportation Commission
November 14, 1996

8.1.E Commentator points out that the DEIR does not analyze traffic impacts outside the city limits and asks for analysis of traffic impacts on Route 29 North and South of the city limits.

Response: Determining the external impacts of growth for an area as large as the City of Napa is difficult since technically it is not possible to attribute specific impacts soley to the city. Impacts outside of the city are attributable to three major sources:

- Growth within the city
- Growth outside the city
- Growth in travel demand between locations outside of the city

With regard to growth within the city, a significant increase in travel outside the city would not occur without growth outside the city. For the real-world condition where there would be growth throughout the sub-region, it is difficult to attribute impacts just to the city, since trips with ends both in and out of the city are partially attributable to each. Thus, it is not proper to simply compare 1992 (base year) conditions to 2020 buildout conditions and attribute all of the impacts to the city.

In other work for projects in Napa County, particularly for the Napa County Congestion Management Agency, eight representative intersections outside the city have been evaluated. In respons, Dowling Associates evaluated these intersections for the following conditions:

- Existing conditions
- A combination of 2020 land use in the City of Napa and 1992 land use outside the city; this represents the "existing-plus-project" impact in that it holds outside conditions constant. However, it does not represent a real-world condition in that, even if there is no growth within Napa County outside the city (which this scenario is intended to represent), there would still be a growth in external-external traffic (such as that between Solano and Sonoma Counties, which in fact represents the largest component of traffic growth within the County)
- A combination of 1992 land use within the city of Napa and 2020 conditions outside the city. This is represents a cumulative scenario "base case," representing the external events that would occur outside of the city in the year 2020
- A 2020 forecast, using 2020 land use and external travel patterns for all conditions. This represents the so-called "cumulative scenario."

In order to prepare this supplemental analysis, it was necessary to make one set of assumptions that differs from all other model runs made to date using the Napa County Travel Forecasting Model. In all other runs, the control totals for traffic at the gateways to the county were derived using Metropolitan Transportation Commission (MTC) travel model estimates as controls; the MTC model estimates were used to determine growth factors on existing volumes to derive the gateway controls. In those cases, however, Dowling was preparing a composite estimate for a particular target year (i.e. a 2000 forecast or a 2020 forecast). In this case, Dowling prepared scenarios for the specific purpose of determining impacts, and have used combinations of data for 1992 and 2020. In order to reflect the fact that some internal Napa traffic will be destined for areas outside the county, it is necessary to derive some type of methodology to determine how much additional traffic might go outside the County with this type of combined data. The technique used has been to determine the growth rate between 1992 and 2020 for internal Napa County traffic, and to factor the gateways up by that proportion. Thus for the scenario composed of 2020 land use within the city and 1992 outside the City, the gateway volumes were increased by 14%, representing the total contribution of 1992-2020 growth within Napa County to traffic compared

to 1992. For the scenario where 2020 land use was used within the city of Napa and 1992 land use used outside the city, the gateway volume were increased by 27%.

Table 1 below will be inserted as Table 3.3-4 in the Revised Draft EIR. The table documents the numerical results of this analysis by reporting Service Level at each of the eight intersections for the four scenarios described above. The 1992 scenario uses the 1992 highway network; the remaining scenarios use the 2020 network. Note that since 1992, improvements have been made to the intersections of SR 29/Airport Boulevard and SR 29/Kelly Road; as a result, improvements are seen for the scenario which combines 2020 land use in Napa and 1992 in the remainder of the county.

Looking at the first two data sets in Table 1, which represent existing conditions and existing plus project conditions, it can be seen that the Service Levels with the project are the same or improved as the existing conditions. When a comparison is made between the second two data sets, which represents the cumulative situation, it can be seen that the service levels are the same except at the intersection of American Canyon Road and SR 29, where the Service Level would decline from D to E. Thus, for the existing plus project scenario, the Draft General Plan would have no significant impacts on the major roadways in Napa County that lie outside the City. For the cumulative scenario, there would be a projected degradation of traffic at one intersection, American Canyon Road & SR 29. This degradation would still be within the Napa County CMA's standard for this facility. The major expected changes in service level between 1992 and 2020, at SR 12/29/Airport Boulevard, would be caused largely by the increase in traffic between Sonoma and Solano Counties.

The DEIR text has been revised to incorporate this analysis.

Table 1 — Comparison of External Traffic Conditions

Intersection	Service Level	Average Delay (Secs.)	Volume/ Capacity Ratio
1992 Existing Conditions			
#1012 Oak Knoll & SR 29	B	7.4	0.479
#4320 Madison & SR 29	B	6.7	0.672
#4321 SR 29 & Adams (St. Helena)	B	11.7	0.73
#4372 SR 12 Kelly	F	267	1.515
#4373 SR 29 & SR 12	F	496	1.662
#4864 SR 29 & Rio Del Mar	A	4.4	0.696
#4897 SR 29 & Pope (St. Helena)	B	11.3	0.711
#4916 SR 29 & American Canyon	C	21.6	0.893
2020 in Napa - 1992 Outside			
#1012 Oak Knoll & SR 29	B	7.2	0.554
#4320 Madison & SR 29	B	6.7	0.672
#4321 SR 29 & Adams (St. Helena)	B	10.8	0.604
#4372 SR 12 Kelly	B	11.8	0.791
#4373 SR 29 & SR 12	C	22.3	0.924
#4864 SR 29 & Rio Del Mar	A	4.1	0.573
#4897 SR 29 & Pope (St. Helena)	B	11.1	0.673
#4916 SR 29 & American Canyon	C	17.4	0.707
1992 in Napa - 2020 Outside			
#1012 Oak Knoll & SR 29	B	7.9	0.624
#4320 Madison & SR 29	B	6.7	0.672
#4321 SR 29 & Adams (St. Helena)	B	10.8	0.604
#4372 SR 12 Kelly	C	19.6	0.957
#4373 SR 29 & SR 12	F	205.1	1.393
#4864 SR 29 & Rio Del Mar	B	5.5	0.832
#4897 SR 29 & Pope (St. Helena)	F	75.4	1.174
#4916 SR 29 & American Canyon	D	37.0	1.018
2020 Cumulative			
#1012 Oak Knoll & SR 29	B	8.4	0.659
#4320 Madison & SR 29	B	6.7	0.672
#4321 SR 29 & Adams (St. Helena)	B	10.8	0.604
#4372 SR 12 Kelly	C	18.8	0.948
#4373 SR 29 & SR 12	F	273.5	1.48
#4864 SR 29 & Rio Del Mar	B	5.7	0.837
#4897 SR 29 & Pope (St. Helena)	F	85.1	1.195
#4916 SR 29 & American Canyon	E	45.4	1.058

9. Napa Sanitation District
November 14, 1996

9.1G The commentator provides several corrections to the Draft Background Report discussion of wastewater collection and treatment.

Response: The suggested corrections will be made to the Background Report prior to its adoption.

9.2G Commentator suggests Policy CS-9.3 be revised.

Response: This policy recommendation can be presented to the City Council during hearings on the Draft General Plan.

9.3G Commentator suggests revision to the Policy Document text discussion of wastewater treatment facilities.

Response: The suggested correction will be made to the Policy Document prior to its adoption.

9.4G Commentator suggests revision to the text discussion of sludge disposal and water reclamation.

Response: The suggested revisions will be made to the Policy Document prior to its adoption.

9.5G Commentator suggests revision to the text discussion of possible reclaimed water use by Stanly Ranch.

Response: This policy recommendation can be presented to the City Council during hearings on the Draft General Plan.

9.6E Commentator recommends mitigation measure (Policy CS 9.3) be revised.

Response: *See Response Comment 9.2.*

9.7E Commentator feels that impacts under Wastewater Treatment, Storage, and Disposal should be classified as significant.

Response: ***See Standard Response Wastewater.*** The General Plan DEIR has been revised to find wastewater treatment capacity significant based on the existing NSD facility; however, the City is proposing an additional mitigation in the form of a policy that would require that all new applicants for development secure a "will-serve" letter from the NSD if the District notifies the City that a critical capacity situation exists. The mitigation would reduce the impact to less than significant.

9.8E Commentator suggests revisions to the text discussion of wastewater treatment facilities.

Response: The text of the DEIR has been revised as suggested.

9.9E Commentator suggests alternative language for significance criterion under wastewater.

Response: *See Standard Response Wastewater.* The text of the DEIR has been revised to read: "A significant impact would occur if new development authorized by the General Plan generated wastewater flows that exceeded the existing or planned wastewater treatment, storage, and disposal capacity of the Napa Sanitation District's system."

9.10E Commentator feels the impact conclusion should be changed from "Insignificant" to "Significant" and suggests modifications to the discussion that follows.

Response: See Response to Comment 9.7.

9.11E Commentator offers corrections to text on page 3.12-1 of DEIR concerning hazardous material.

Response: The DEIR text has been revised as suggested. The County Department of Environmental Management has confirmed that sulphur dioxide gas and chlorine are no longer in use at Imola and Soscol wastewater treatment plants and therefore these facilities are no longer considered the two highest ranking facilities within the City and County of Napa. (4/24/97 Phone Con w/ Kerrie Fergus, Env. Mgmt.)

9.12E Commentator provides explanation of Phases 1 and 2 of treatment plant upgrades.

Response: The DEIR text has been revised as suggested.

9.13E Commentator suggests that General Plan and EIR needs to provide projections of future wastewater flows.

Response: *See Standard Response Wastewater.* The NSD/ACCWD 1990 Master Plan Update contains wastewater generation estimates of new development within the RUL through the year 2012 . The City of Napa feels it is NSD's responsibility as part of its master planning to develop and periodically update wastewater flow projections, which include inflow and infiltration, for individual service areas (e.g., the RUL) and all areas expected to contribute flows to the Soscol Treatment Plant.

9.14E Commentator provides clarification concerning the capacity of the Soscol Treatment Plant.

Response: The DEIR text has been revised as suggested.

9.15E Commentator provides information on the City of American Canyon's future wastewater treatment needs.

Response: The DEIR text has been revised as suggested.

10. Napa County Congestion Management Agency
November 18, 1996

10.1G Commentator references Policy Document and seeks clarification of the land use scenario that was used in the traffic projection model.

Response: Table 1-2 in the Draft Policy Document was prepared from a different source than the data used for travel forecast modeling. However, they were intended to be compatible. For comparative purposes, see the table below. It should be noted that the differences at 2020 are less than 1%, and that given the other variables over a 20+ year period, this is a reasonable difference for long range, theoretical planning purposes.

Comparison of Housing Totals		
	Draft Policy Document Table 1-2	Travel Model Data
1992 Existing	27,098	27,255
Added to 2020	7,840	7,369
Total 2020	34,938	34,624

10.2G Commentator references Policy Document and makes observations regarding scenic corridors.

Response: Comment noted, no response required.

10.3G Commentator references Policy Document and makes observations regarding project financing.

Response: Comment noted, no response required.

10.4G Comment compliments introductory text of Transportation Element.

Response: Comment noted, no response required.

10.5G Commentator suggests showing the remainder of Trancas and the portion of Silverado on Figure 3-1 to avoid confusion.

Response: Comment noted; Figure 3-1 will be revised.

10.6G Commentator refers to the Policy Document, Table 3-3 and clarifies that State Route 29 is presently rated as a freeway by Caltrans from north of the intersection of 29/12/121 to one-quarter mile north of Lincoln and that with the construction of the 29/Trancas interchange, the designation will move to north of Trancas but below Trower. Further, the freeway section will not move south of the 121/12/29 intersection as the Table shows.

Response: The text will be changed to read as follows: " State Route 29 from the intersection of SR 29/12/121 to Lincoln Avenue (extending to north of Trancas Street upon completion of the SR 29/Trancas interchange)."

10.7E Comment questions the extent that the impact analysis included consideration of projects beyond the City's RUL.

Response: Comment noted; *See Response to Comment 8.1.*

10.8E Commentator refers to Policy Document and Implementation Programs on Page 3-11 and to page 3.3-6 of DEIR and observes that the two project lists are not consistent.

Response: The text on page 3-11 of the Policy Document should be changed to reflect Table 3.3-3 in the Draft EIR. The comment regarding one project lying outside the City is not specific enough for a response.

10.9G The commentator requests that the City apply State Standards as policy for Caltrans intersections within the City.

Response: Policy T-2.1 is intended to state the Service Level Goal of the City of Napa. The exclusion of one specific intersection that is at least partially under the control of CALTRANS is not related to the fact of shared control but rather to the fact that this specific intersection - Trancas/Redwood - is congested beyond the desired standards and will not be improved until all parties involved come up with a financing plan; the exemption is intended to recognize this real-world fact. With regard to other intersections where CALTRANS has partial jurisdiction, the City's policy remains a goal and may or may not coincide with CALTRANS desires. The City's goal represents the City's objective, and it is clearly recognized that as problems occur or improvement projects are proposed, the two parties will engage in the time-honored exchange of working out a plan that meets the desires and funds available to all parties.

10.10G Commentator suggests the City change its method of evaluation to include the examination of roadway segments as well as intersection operation.

Response: Policy T-2.3 will be changed to eliminate the phrase "and street segments." Within a developed city, signalized intersections are the dominant control on capacity; segments are only of concern on freeways or on unsignalized highways such as those which lie outside of the City. Since freeways are clearly not within the jurisdiction of the City, limiting evaluation to intersections will provide a suitable framework for analysis and evaluation of impacts on the system.

10.11G Comment suggests changes to Crucial Corridor policies.

Response: The comment is respectfully acknowledged; however, the crucial corridors policies have been a unique and particular focus of the City of Napa since the 1982 General Plan. The text in these sections follows that which has been policy for many, many years. Implementation of the crucial corridor policies and accompanying Traffic Impact Zoning Overlay has proven successful in accomplishing the purpose of maintaining efficient community wide circulation on these major corridors as demonstrated in the existing conditions LOS data in the DEIR. These policies provide the City the descretion to impose additional requirements on the intensity of uses, site design and parking, and even to deny a use if it is shown that it would reduce the efficiency of traffic movement on the crucial corridor.

10.12G The commentator suggests extending the Crucial Corridor designation of Trancas beyond Big Ranch to Silverado Trail (SR 121).

Response: The extent of the recommended extension of the Crucial Corridor designation of Trancas Street to Silverado Trail would extend it beyond the City's jurisdiction. The comment is well taken, however, and the Policy Document will be revised to extend the Trancas Crucial Corridor to the Napa River, which forms the edge of the RUL just to the east of the Trancas Street/Soscol Avenue intersection.

10.13G The commentator suggests that Crucial Corridor policies in certain areas be rewritten to increase parking requirements.

Response: The Traffic Impact Zoning Overlay, which implements the Crucial Corridor policies of the General Plan requires an increase in on-site parking by 20% for projects adjacent to Crucial Corridors. The City has found this to be an adequate, reasonable and effective means of addressing potential parking impacts on Crucial Corridors.

10.14G The commentator questions whether traffic calming policies will be effective and offers opinion regarding the most effective methods.

Response: Comment noted, no response required.

10.15G The commentator encourages revisions to the phraseology of TDM policy text and suggests the addition of implementation programs.

Response: No response required. See Policy Document page 3-20, Implementation Program T-5.B.

10.16G Commentator indicates that text could be revised to reflect recent adoption of County Bicycle Plan.

Response: The text for the second paragraph of page 3-21 of the policy document will be changed to reflect the fact that the County Bicycle Plan has been adopted.

10.17G The commentator requests that the implementation time frame for a demonstration project for bicycle friendly intersection controls and for publication of a bicycle route map be shortened from the 1998-2000 time frame indicated in the draft Policy Document.

Response: The demonstration project is in the process of being designed and is scheduled for completion by the end of 1997. Implementation program T-6.F regarding a bicycle route map, is anticipated to be completed within one year from the date of adoption of the General Plan. It should be noted that the time frames indicated in the draft Policy Document are subject to consideration by the City Council during hearings on the General Plan. The timing of programs is based on funding and staffing priorities; the 1998-2000 time frame for implementation has generally been recommended for the higher priority programs.

10.18G Commentator refers to page 1-21 of the Background Report and recommends the City request the State to officially designate SR29 a scenic highway.

Response: In Policy LU-1.6, on page 1-8 of the Policy Document, the City designates SR 29, SR 121 and SR 221 as scenic corridors, promoting utility undergrounding, landscaping and other improvements to enhance their appearance and the community identity. This policy implies support for official State designation of these highways. Specific language to that effect could be added by the City Council if they so desire during their consideration of the Draft General Plan.

10.19G Commentator questions consistency of growth projections used in General Plan Update traffic modeling with growth projection used in the CMA traffic modeling.

Response: The text in the final paragraph on Page 1-29 of the Draft Background Report will be changed to read as follows:

In 1992, the City of Napa and the Napa County Department of Public Works jointly funded the development of a travel forecasting model to be used for diverse purposes in the County. The City desired and has since used the model for its General Plan Update; the County Department of Public Works subsequently transferred the model to the Napa County Congestion Management Agency. The CMA portion of the model has subsequently been updated to reflect 1994 ABAG land use control totals, whereas the General Plan work has continued to use the 1992 model and data as a basis. Other than the basis of land use, the models are intended to be as compatible as possible given the different goals of the two respective users. Land use data in the Napa General Plan data portion of the model represents a combination of 1992 City Land Use data plus (for 2020) the increment projected for build-out of the plan. It also includes estimates provided by the County Department of Conservation, Development and Planning for those portions of the County outside the City.

10.20G Commentator clarifies that 2020 projection figures shown in the Background Report on Page 1-34,

Table LU-3 were generated by the City of Napa Planning Department.

Response: Comment acknowledged. The projections to 2020 were made by the Planning Department based on trends shown by the ABAG numbers. The footnote does refer to City of Napa Planning Department as shared source of information.

10.21G Commentator questions assumptions concerning commute patterns.

Response: The commentator poses a number of questions that, if answered in the implied detail, would produce research data on travel within Napa that is beyond the scope of that required for General Plan purposes. The intended point of the referenced text is that "less than half of all trips on city of Napa streets originate and end within the City". The statement is simply intended to indicate that with regard to traffic, Napa is not an island but is in fact part of a larger urban fabric. Providing exhaustive answers to each of the questions in this section would not, in the view of the authors of the EIR, add any clarity to the document. The authors would note that the statement is intended to apply to all roadways in Napa, not just City streets, and that the data come from an analysis of travel patterns, not individual streets. Answers to these questions can be derived from MTC modeling data, as such travel forecasting is more appropriately handled at a regional level.

The commentator also asks what the plan does to eliminate or reduce the "cross-commute." The authors have not located that precise term within the document, and could interpret either of two specific meanings. If the term refers to commuters crossing Napa County from Solano to Sonoma or vice-versa, there is little the City could do, since this is a sub-regional movement. If the question is about people living in Napa and working elsewhere, and vice-versa, this is the great problem facing all growing urban areas. It is a problem that cannot be dealt with by a single city, as it reflects the interaction between housing costs, location of jobs, and the complete flexibility of people to live anywhere and work anywhere regardless of the amount of time required for travel. Because no agency has control on the latter, and because the use of time is the most crucial and variable element in the travel process, there is very little that any government agency - city, county or regional - can do. Even the acknowledged desire to balance jobs and housing, which is a confirmed component of both City and County plans, will not provide a solution to the problem so long as the individual is allowed to maximize his housing value while the public subsidizes his real travel costs. Until this issue is dealt with at a Statewide or at least regional level, no policy at the local level will have a major impact. The Napa County CMA is in a better position to influence regional transportation policy than the City.

10.22E Commentator asks for more information on performance of segments, not just intersections.

Response: *See Response to Comment 10.10.*

10.23E Commentator raises concerns about the level of service at the 221/29 intersection.

Response: The Napa County Congestion Management Program prepared by Cambridge Systematics, Inc. in June 1992, reported the Service Level at SR 221/29 to be F. The model was calibrated at that time to reflect the LOS F condition, and to the best of our knowledge, those computations have remained in place in all work produced by Dowling Associates, including work for the Napa County CMA. If the Service Level has indeed changed, that information was not delivered to Dowling Associates until this letter. All of the prior work has been driven by the need to maintain consistency with prior efforts, and this location is one of those governed by that focus. The LOS reports in the General Plan EIR reflect consistency with the original calibration.

With regard to impacts in other areas of the County, please see *Response to Comment 8.1*

10.24E Commentator concurs with statement in DEIR that a CMP analysis of the General Plan is not required.

Response: No response required.

11. The California Native Plant Society
November 16, 1996

11.1G Commentator poses several rhetorical questions.

Response: Comment noted. No response necessary.

11.2E Commentator questions build out calculations and their relationship to a popular vote in the 1970s for a population cap of 75,000. Comment is also made regarding the relationship between dwelling units, population and household size and whether the DEIR considers the appropriate buildout potential.

Response: Page 5 of the Draft Policy Document explains the background of the plebiscite that resulted in the 75,000 population figure as follows:

> *"In 1973, following state legislation to allow advisory ballot measures, the City Council placed questions on population growth (known as the "plebiscite") on the November ballot. Of the choices available, the option with the least population increase (75,000) was selected by the voters as the city's preferred size. The City Council adopted a new general plan in 1975, less than two years after the plebiscite. Consistent with the advisory ballot measure, the plan projected a year 2000 population of up to 75,000 and contained urban development within an urban growth boundary dubbed the Residential Urban Limit Line (RUL)."*

The 75,000 population was used in the 1970's for planning to the year 2000. Population data over the last 20 years show that the contained growth policies adopted with the 1975 plan were effective in limiting population growth; current projections anticipate a population of 72,250 by the year 2,000 (2,750 less than the voter recommended limit for 2000). The Draft General Plan looks to the year 2020 as a planning horizon and maintains the same fundamental contained growth policies that were initiated in the 1975 Plan. The 2020 population projection of 81,140 shown in the Draft General Plan is based on the belief that these same policies will continue to maintain a conservative growth rate with an overall rate increase of less than 1% per year between the years 2000 and 2020.

The text under "Growth Forecasts for the Year 2020" on page 2-13 of the DEIR explains that the number of projected dwelling units for 2020 is derived from the residential capacity analysis method developed by the CAC (Citizen's Advisory Committee). This method is explained in Appendix C of the Draft Policy Document. The 2020 population is derived from straight line projections based on the trends shown in the ABAG population projections from 1980 to 2010. Recognizing that demographic trends affect household size over the planning period (see discussion on page 10 of Draft Policy Document) a static household size is not assumed over a 25 year period. The 2020 projections are intended to provide a guide for policy planning purposes and may or may not "come true" based on the variables (both internal and external) that affect a city's population, economy, and land use decisions over a 25 year period. The CAC established the 2020 projections to be used for planning purposes for the next 25 years and the Council

confirmed these projections in the Concept Report. CEQA requires that the Draft EIR provide a program level analysis of the possible impacts that might result from the maximum development anticipated by the Draft General Plan. The purpose of the DEIR is not to determine whether the General Plan correctly forecasts the future.

The introductory text on pages 12 and 13 of the Policy Document provides additional information regarding growth projections and states that "..... *build-out capacity already takes into account reductions in development potential due to environmental constraints and other factors, this General Plan is not predicated on the assumption that reaching this theoretical "capacity" is either achievable or desirable. Instead, this plan is based on reasonable expectations regarding the amount of development actually likely to occur.....*".

11.3E Commentator refers to a phrase under the cumulative impact discussion of biological resources on page 4-5 of the DEIR and notes that the Draft General Plan does not present an estimate of the area or nature of additional parks and open space to be retained after full build out.

Response: The referenced DEIR text on page 4-5 discusses the cumulative benefit of the Draft General Plan policies with regard to biological resources in Napa County. This paragraph concludes that the containment of urban development will preserve the overall land use pattern of the region thereby minimizing disturbance of native grasslands, wetlands and other sensitive biological communities and habitats in the Napa region. The commentator appears to relate this section of the DEIR to the buildout within the RUL anticipated by the General Plan and asks what quantity and quality of parks and open space (implying that these areas will retain native grassland and wetlands) will be retained after the maximum residential and commercial development has occurred. Page 3.7-1 through 3.7-9 of the DEIR provides the impact assessment of biological resources related to development contemplated by the Draft General Plan and includes references to policies in the draft plan that serve as mitigation measures. A description of habitats, including listings of sensitive plant and wildlife species is included in the General Plan documents and in the DEIR. Parkland acreage figures are included in the Parks and Recreation Element of the Draft Policy Document.

11.4G Commentator raises several objections to the designation of Stanly Ranch for development.

Response: *See Standard Response Stanly Ranch.* This policy recommendation can be presented to the City Council during hearings on the Draft General Plan.

11.5E Commentator refers to page 3.6-3 of DEIR that references Policy LU-6.4 which promotes riverfront development that reorients downtown to the Napa River. Commentator feels the policy is inappropriate and that biological values and riparian habitat be promoted and riverfront development be limited.

Response: The analysis and conclusions on page 3.6-3 of the DEIR is in the context of the visual setting in the downtown area. The draft policies referenced do not preclude the restoration of riparian vegetation where possible. If these policies were eliminated, redevelopment of riverfront properties in the downtown could occur in the same pattern as currently exists (backs to the river) without the strength of the General Plan to support the exploration of other opportunities during development review. Policy NR-1.1, NR-1.3, NR-1.4, NR-1.5, NR-1.6, NR-1.8 and related implementation programs in the Natural Resource chapter of the Draft Policy Document address the preservation and restoration of riparian vegetation.

11.6E Commentator refers to the occurrence of vernal pools north Green Island Road (page 3.7-2 of the DEIR) and in the Big Ranch Road and Foster Road areas and feels protections should be determined with the General Plan.

Response: The vernal pools known to exist north of Green Island Road are outside of the city limits and the RUL and would not be affected the City's General Plan policies. It should be noted however that the City has designated some of the land in this vicinity as Greenbelt to establish the clear policy desire regarding County development in these areas. The policies under goals NR-1 and NR-2 of the Natural Resource Element generally address habitat and vegetation protection in all categories, including vernal pools. Vernal pools are not specifically identified in the policy text; however they would be considered a form of wetland (as described in the Background Report on page 7-6) and subject to the policies of the Plan as well as very specific state and federal regulations when a project level environmental assessment is undertaken. In the case of the Big Ranch area, the recently adopted Big Ranch Specific Plan includes policies that require confirmation by CDFG and the Corps of satisfactory mitigation as part of the environmental review process for specific development applications.

11.7E Commentator points out that the DEIR does not state the importance of preserving wildflower fields and feels a mitigation bank should be established.

Response: The commentator was contacted in order to clarify the location of any known sites of rare or endangered vegetation types. As a result of the discussion it was found that the area of greater concern to the commentator is the area east of Foster Road and West of Highway 29; and that reference to the Foster Road RUL adjustment was thought to be in this area -- which it is not. The concern is based on the commentator's observation of the plant communities in the area east of Foster Road; however there is no record or specific location of rare or endangered plants, including wildflowers, in the Foster Road RUL adjustment area or in other locations in the vicinity. The publication referenced in the comment was obtained and reviewed, and consists of a listing and description of all terrestrial natural communities in California. No specific site references are given in the publication relative to Grasslands and Wildflower communities in Napa; however, the descriptions would indicate that these plant communities exist in isolated vacant areas within the RUL. It is hoped that by confining urban development within the RUL, pursuant to the policies in the Draft General Plan, the County can pursue policies that would protect and enhance remaining and significantly larger grassland, wildflower and other habitat areas throughout the County. *Also see Response to Comment 11.3.*

11.8E Commentator feels the list of sensitive plant species is incomplete.

Response: The DEIR preparers consulted the most recent references available from the California Department of Fish and Game and the U.S. Fish and Wildlife Service and supplemented with other biological references, including the 1996 Natural Diversity Data Base to compile the listing found in Table NR-1 (see DEIR Reference Section pg. 6-4). If the commentator has knowledge of any update in official designations or acknowledged occurrence of listed species in the planning area, this information would be helpful to the preparers of the General Plan. The reference in the comment does not provide the detail needed to verify the claim. It should be noted that special status species designation continually changes and that the listing in the DEIR is considered the best information available (acquired from recognized sources) at the time of DEIR preparation.

12. Napa County Conservation, Development and Planning Department November 15, 1996

12.1E Commentator expresses concern about an apparent City policy shift in expanding the RUL, including a 40 acre parcel zoned Agricultural Preserve. Commentator feels this is growth inducing and not adequately discussed in the DEIR

Response: *See Standard Response RUL.*

12.2E Commentator expresses concern about the inclusion within the RUL of state property southwest of Imola Avenue and Soscol Avenue since it may reduce future options for County to address jobs and housing balance given the limitations imposed by Measure J.

Response:. *See Standard Response RUL.* The City considers inclusion of the State Hospital, a non-agricultural use, within the RUL to be consistent with the intent of Measure J. The State Hospital is already within the City's Sphere of influence and is not designated as agricultural land. It should be noted that Measure J currently applies only to the County's General Plan, and is not a legal constraint on City land use decisions.

12.3E Commentator expresses concern that DEIR does not address in a comprehensive way the development of the Stanly Ranch and its traffic impacts.

Response: ***See Standard Response Stanly Ranch.*** The Draft EIR addresses Stanly Ranch as it does all other potential development that could occur with the buildout of the General Plan: by including assumptions about the level of future development in the land use data base used for travel forecasting, and then producing an evaluation of traffic deficiencies and improvements needed to address those deficiencies. The statement on page 3-13 that there is "an inability to significantly expand roadway capacity" does not mean that locally focused projects can not be completed to mitigate some problems. In the case of the Stanly Ranch area, the Draft EIR includes, on page 3-13, an improvement project at the intersection of SR 12/29/121 that would provide for local widening to relieve impacts both for Stanly Ranch and other future growth. Table 3.3-2 indicates that this improvement would make a significant improvement to service level at this location, almost bringing the average delay back to 1992 conditions. Given that much of the traffic increase at this location is not Napa County generated, this would be an acceptable improvement. Other minor improvements to Stanly Ranch access would naturally be evaluated as part of a project-level EIR on that project; these improvements are not expected to be of such scope as to require an amendment to the General Plan. The authors note that the Policy Document will be corrected so that all projects on Pages 3.3-6 and 3.3-7 of the EIR will be included in the project list in the Policy Document.

12.4E Commentator feels General Plan should include implementation programs for the city to fund its proportionate share of addressing road and intersection impacts outside city limits.

Response: *See Response to Comment 8.1* regarding impacts of city traffic outside the city of Napa. With regard to funding, it is very clear to all parties involved that funding is a crucial issue for transportation anywhere in California, and not just in the city of Napa or in Napa County. For a wide variety of reasons, there is currently not sufficient funding available to allow local jurisdictions to satisfy the measures of effectiveness or standards contained in the General Plans or other documents. Smaller counties such as Napa suffer in greater proportion since they have relatively less flexibility and significantly less political clout to obtain discretionary funds. Napa is particularly affected by the Bay Area funding mechanisms which allocate funds to counties on the basis of population and other socio-economic indicators. The biggest traffic problem facing Napa County is the rapidly increasing growth in traffic between Sonoma and Solano Counties. This growth is completely caused by those two counties, yet the impact falls on Napa County.

The statement that the City should provide for funding for improvements to facilities outside the City is a rather one-sided view of the world since, for exactly the same reason, the County and other cities, in and out of Napa County, should be providing funding for improvements within the City. This is a global issue, not a single jurisdictional issue. The proper approach would be a joint effort by all parties involved

to provide funding to respond to impacts anywhere in the County. This is one of the principal intents of the coordination programs overseen by the Napa County Congestion Management Agency. As it happens, the CMA is currently in the process of preparing a Deficiency Plan that will address these issues comprehensively, identify a certain set of improvement projects that may become implementable over time, and otherwise structure a county-wide response to the funding issue. All agencies in the County involved in transportation would best work through that mechanism rather than attempting to formulate individual, unrelated and uncoordinated responses to the funding issue.

The City is attempting to do its part in participating in the solution to these traffic problems. The DEIR has been revised to recognize the uncertainty of funding related to the feasibility of implementing traffic mitigations and has concluded that, without adequate funding, these remain potentially significant impacts.

12.5E Commentator points out that the air quality analysis needs to reflect any changes made in response to above comments.

Response: With inclusion of the Response to Comment 8.1, the City believes that traffic impacts are adequately analyzed and addressed at a general plan level. Since there are no new traffic conclusions resulting from the comments and responses, there is no need to revise air quality information in the DEIR.

12.6G Commentator urges City to include implementation programs to cooperate with the County on housing development.

Response: The City is one of only two jurisdictions in the county to have a certified Housing Element (American Canyon being the other). The Housing Element, adopted in 1991, has a time frame through June 1999 and, for this reason, was not updated as part of the comprehensive General Plan update. Many of the programs in the Element have already been implemented through the Housing Authority.

The commentator recommends policies and programs for inclusionary housing, an in-lieu fee program and for the implementation of AB 3456. The City Housing Authority is currently holding a series of workshops to explore the most favorable options for providing affordable housing in the city and inclusionary housing has been identified in these group sessions as a good way to integrate affordable units throughout the city. The outcome of these workshops will be the basis for updating policies in the Housing Element in 1999.

City officials are currently participating in the South Napa County Working Group to explore a solution to the provisions for housing for jobs created in the unincorporated area of the County.

12.7E Commentator feels DEIR analysis of water supply impacts is inadequate and disagrees with the DEIR's conclusion that the water supply impacts are insignificant.

Response: *See Standard Response Water Supply.*

13. Napa County County Counsel
November 18, 1996

13.1E Commentator feels the DEIR is inadequate in its failure to evaluate regional impacts and should be revised and recirculated.

Response: These concerns are addressed in more detail elsewhere in this same comment letter. The DEIR has been revised and will be recirculated with these responses.

13.2E Commentator points out that the DEIR does not adequately describe the regional setting.

Response: *See response to Comment 13.11* where this concern is addressed in more detail.

13.3E Commentator feels DEIR is inadequate in its failure to address regional effects in the area of air quality, water supply, wastewater treatment, and traffic.

Response: These concerns are addressed in more detail elsewhere in this same comment letter.

13.4E Commentator feels DEIR traffic analysis is inadequate in several specific impacts.

Response: The commentator appears to misunderstand the material supporting the Draft EIR in all aspects of this comment. With regard to the South Napa Marketplace and the Lucky supermarket, these projects are included in the general terms of land use quantities that are used for the entire City. The South Napa Marketplace project actually came into being during the preparation of this General Plan, and data reflecting it are specifically included in the land use tables. Staff have reviewed the 2020 land use file with respect to the South Napa Marketplace project and note that the zone containing this project contains an increase of 540,000 square feet of general retail land use between the 1992 base year and the 2020 buildout year. There are small increases in other uses as well. This amount of land use exceeds the actual project as analyzed by Dowling Associates in a CMP conformity analysis dated January 19, 1993, which means that there is room for additional growth in that zone. Likewise, the Lucky Superstore was analyzed in a letter dated February 23, 1994 by Dowling Associates to the City. That letter showed a proposed increase of 35,000 square feet of retail use. Comparing the 1992 and 2020 General Plan data used in support of the General Plan, we find that the zone where the development is located contains an increase of 49,000 square feet of retail use, enough to accommodate the proposed development.

With regard to the Stanly Ranch project, *see the Response to Comment 12.3.* With regard to the issue of ABAG '96 projections, the commentator does not note a specific reference to that item, so it is not possible to comment directly on it. However, the following may be of interest. The City worked very closely with the Napa County Department of Conservation, Development and Planning (one of the signers of the commentating letter) to develop land use projections for the area outside of the County for the year 2010. Growth up to that year represents the best efforts of County staff to anticipate that amount of growth. To take the non-City data out to 2020, the consultant team used estimates of growth for Napa County prepared by the State Department of Finance and extrapolated the non-City data to 2020. This represents the best possible use of available data. Further, because of the way the travel model works, the land use data in the areas outside of the City do not need to be as precise as the data inside the City when the roadways inside the City are the primary focus of Environmental Review. Overall, the data pulled together cooperatively from all sources are sufficient to permit a valid analysis of 2020 conditions and the means by which the project has impacts within and outside of the City.

13.5E Commentator feels the DEIR conclusion that traffic impacts are insignificant after mitigation is not supported by the DEIR analysis.

Response: The DEIR text has been revised to expand impact analysis and to find some impacts significant or potentially significant. Concerning traffic impacts, potentially significant impacts could result where construction and the feasibility of funding of future traffic improvements are uncertain and/or outside the City's control. Regardless, the City intends to pursue every available means to obtain funding

for and schedule the timely implementation of improvements necessary to mitigate the development enabled by the Draft General Plan.

13.6E Commentator feels the DEIR is inadequate in its failure to address cumulative impacts of reasonably foreseeable developments.

Response: *See Standard Response RUL and Standard Response Stanly Ranch.* The development potential associated with the Stanly Ranch is included in the Draft General plan and was, therefore, considered and analyzed at an appropriate level in the DEIR. Development of the Lucky Supermarket and the remainder of the South Napa Marketplace Shopping Center was also reflected in the Draft General Plan and was, therefore, considered in the DEIR. Concerning the Airport Industrial Area, the DEIR assumed that development would occur consistent with the currently adopted Airport Industrial Area Specific Plan.

13.7E Commentator feels the DEIR does not adequately address the growth inducing impact of designating Stanly Ranch and the RUL Adjustment area east of Big Ranch Road for development.

Response: *See Standard Response RUL and Standard Response Stanly Ranch.* The City does not consider development of Stanly Ranch or the RUL adjustment area east of Big Ranch Road to be growth inducing.

With regard to the Stanly Ranch, it is already within the City Limits and has been slated for urban development for over 20 years. The SA land use designation of the 1982 General Plan does not indicate that development will not take place as the commentator implies, but that a specific plan will be necessary to determine the distribution of land uses and provision for infrastructure. The Draft General Plan continues the assumption that the incorporated land of the Stanly Ranch is appropriate for Urban development once a Specific Plan is prepared. General land use designations have been applied to demonstrate the maximum development envelope that was assumed for the area during preparation of the Draft General Plan and DEIR. It is anticipated that the land use designations will be further refined as a result of the Specific Plan process that was initiated by the property owners in May 1997.

Since the Draft General Plan does not change the circumstances that influence future development of the Stanly Ranch, it does not present a growth inducing condition. In terms of services, the Stanly Ranch area is already served by a 36 inch water main. It is not currently served by the Napa Sanitation District; however, the extension of wastewater service to an already incorporated area could not stimulate growth since the area is already slated for development by virtue of being within the City limits. The RUL surrounds the Stanly Ranch and the RUL policies applied to development will protect surrounding agricultural land from the pressure for further development. These long standing policies have proven effective in protecting the unincorporated agricultural and open space lands around the city for over 20 years.

With regard to the RUL adjustment area east of Big Ranch Road, the City does not believe that it will be growth inducing. As described in the Standard Response RUL, the City is endeavoring to establish a more defensive RUL line by using the same boundary criteria used in the County General Plan. Relocating the RUL to the line of riparian vegetation along the Salvador Channel provides a substantial visual and physical barrier which will better withstand the pressure for future urban expansion while providing a moderate amount of additional land for residential growth within the confined area of the RUL over the next 25 years. The scale of this expansion is considered minor compared to the long term protection of significant agricultural and open space land that will be achieved by establishing a defensible RUL boundary. It would be extremely difficult for existing services to expand beyond the localized extensions necessary to service this area.

It should be noted that the overall 2020 growth facilitated by the land use designations of the Draft General Plan (including the RUL expansion areas) is within the anticipated service needs for both the City's Draft Water Services Master Plan and the Napa Sanitation District Master Plan (See Standard Response Water Supply and Wastewater).

13.8E Commentator feels the proposed expansion of the RUL is not adequately addressed as a conflict with the Napa County General Plan.

Response: *See Standard Response RUL and Standard Response Stanly Ranch.* The City considers the proposed RUL adjustments moderate and sensible as explained in Standard Response RUL. The changes result in a more defensible line and affect such a small amount of agricultural land relative to the scale of the agricultural and open space setting that will remain protected on the perimeter of the RUL. The agriculturally designated properties are already parcelized in a pattern that precludes significant and viable agricultural development in the future. This is not considered to be a change in City policy.

13.9E Commentator feels the City may no longer be willing to provide housing for new workers in the unincorporated area and this would be a substantial policy change that would represent a significant environmental effect.

Response: The City has never had an adopted goal or policy to provide housing for jobs created in the unincorporated area of the county; in reality, due to the urban development policies of the jurisdictions in Napa County, housing countywide is primarily supplied within urban boundaries. The City has no way to control either where individuals live or where they choose to work; however, the City has always maintained a goal of achieving a jobs housing balance within its jurisdiction and considers this to be a suitable goal for all jurisdictions in the county unless a mutually agreeable program for shared housing is worked out between jurisdictions. The South County Working Group is pursuing opportunities for a solution to this question related to county jobs created in the airport industrial area.

13.10E Commentator feels the DEIR alternatives analysis is inadequate for not considering excluding AW/AP lands or de-annexation of Stanly Ranch.

Response: The Draft EIR evaluates Alternative A-1, Existing Policy, which is the equivalent of the CEQA required "no project alternative". This alternative excludes the area east of Big Ranch Road from the RUL and designates the Stanly Ranch as "Study Area", with no assigned development potential. This alternative is substantively the same as, and would have the same environmental impacts as, the alternative(s) suggested by the commentator.

13.11E Commentator feels the DEIR fails to adequately describe the regional setting.

Response: City disagrees with the commentator's assertion. Together, the Draft EIR, the Draft Policy Document, and the Draft Background Report contain extensive and detailed information on the regional setting. The key sections are identified in Table 1-1 on page 1-3 of the DEIR. The following summarizes where information on the regional setting can be found in each of the three documents.

Draft EIR

- Project Location **pg. S-1**
- Tables 1-1 **pg. 1-3**
- Project Location **pg. 2-1**
- Project Area **pg. 2-1**
- Figure 2-1 **pg. 2-2**
- Figure 2-2 **pg. 2-3**
- Various areas in Chapters 3-1 through 3-12 related to topical issues.

Draft Policy Document

- Regional Setting **pg. 2**
- History of Land Use Planning in Napa **pg. 2 to 7**
- Napa General Plan Context **pg. 8 to 11**
- Environmental Constraints **pg. 11 to 12**

Draft Background Report

- Regional Setting **pg. 1-1**
- History of Land Use Planning in Napa **pg. 1-5 to 1-11**
- Most Chapters of Draft Background Report contain information on the regional setting related to the topical issues (e.g. "Regional Context", Chapter 3 Transportation, pg. 3-1)

13.12E Commentator feels the DEIR fails to adequately address regional and cumulative traffic impacts.

Response: ***See Response to Comments 8.1, 13.4 and 13.5.***

13.13E Commentator cites the DEIR's use of incorrect traffic projections in two areas.

Response: *See Response to Comment 13.4* with regard to the methods used to derive 2020 land use estimates. The traffic consultant has reviewed the 2020 land use file with respect to the South Napa Marketplace project and notes that the zone containing this project contains an increase of 540,000 square feet of general retail land use between the 1992 base year and the 2020 buildout year. There are small increases in other uses as well. This amount of land use exceeds the actual project as analyzed by Dowling Associates in a CMP conformity analysis dated January 19, 1993, meaning that there is room for additional growth in that zone. Likewise, the Lucky Superstore was analyzed in a letter dated February 23, 1994 by Dowling Associates to the City. That letter showed a proposed increase of 35,000 square feet of retail use. Comparing the 1992 and 2020 General Plan data used in support of the General Plan, the traffic consultant finds that the zone where the development is located contains an increase of 49,000 square feet of retail use, enough to accommodate the proposed development.

The data upon which this analysis is based have been available to all parties for a long time, contrary to what is implied in this comment. In fact, these questions were never raised with the consultant prior to their appearing in this letter; the data have remained in the consultant's hands, and it is not entirely clear how these conclusions could have been reached without inspection of the actual data upon which the analysis is based. The information presented demonstrates that the consultant has maintained consistency among the various projects noted in the comment.

13.14E Commentator expresses concern that the DEIR does not adequately address the impacts of Stanly Ranch and Big Ranch Road on capacity of Napa Sanitation District to provide service to the Airport Industrial Area.

Response: *See Standard Response Wastewater, Standard Response Stanly Ranch and Standard Response Big Ranch.*

13.15E Commentator says DEIR needs to evaluate the feasibility of Phase II of the Sewage Treatment Master Plan.

Response: *See Standard Response Wastewater.*

13.16E Commentator feels discussion of proposed mitigation for wastewater treatment and disposal is inadequate.

Response: *See Standard Response Wastewater.*

13.17E Commentator feels DEIR analysis of cumulative impacts is inadequate.

Response: *See Standard Response RUL, Standard Response Stanly Ranch and Response to Comment 13.6.*

13.18E Commentator disagrees with conclusions in the DEIR that all impacts are reduced to a level of insignificance. Commentator specifically cites traffic impacts.

Response: *See Response to Comment 13.5.* Note that SR29/Trancas will be at LOS B with the interchange. The project has received environmental clearance and $27 million has been programmed for the project, $5 million of which has been approved for the first phase of right-of-way acquisition and project design. The Sierra median closure at Highway 29 is funded in the Big Ranch Area Development fee.

13.19E Commentator questions the conclusion that there will be no significant impact on wastewater even though no mitigation measures are identified.

Response: *See Standard Response Wastewater.* The DEIR has been revised to conclude that wastewater impacts are less than significant after application of specific mitigation.

13.20E Commentator says DEIR does not adequately address growth inducing impacts of development in the Stanly Ranch and Big Ranch Road areas.

Response: *See Standard Response RUL and Standard Response Stanly Ranch*

13.21E Commentator feels annexation of agricultural land contemplated by Draft General Plan conflicts with County General Plan and is therefore a significant environmental effect.

Response: *See Standard Response RUL.*

13.22E Commentator questions apparent shift in City policy concerning providing housing for workers in the southern county area.

Response: *See Response to Comment 13.9E*

13.23E Commentator suggests air quality analysis must be revised based on revised traffic analysis.

Response: *See Response to Comment 12.5.* Based on evidence presented in other traffic related responses it is concluded that traffic has been properly analyzed, and that in adding the response to Comment 8.1, those concerns that were not included in the original Draft EIR have been adequately addressed in this document. There has been nothing uncovered by the comments that has required revision to the traffic analysis and conclusions and therefore there is no need to supplement the air quality analysis.

13.24E Commentator feels DEIR does not adequately address Draft General Plan's conflict with the County's General Plan.

Response: *See Standard Response RUL.*

14. Sierra Club Napa County Group
November 18, 1996

This letter was superseded by the Sierra Club's December 2, 1996 (Communication #27)

15. Napa County Local Agency Formation Commission
November 18, 1996

15.1E Commentator feels that, with the exception of sections pertaining to Stanly Ranch, the DEIR is adequate:

Response: Comment noted: no response necessary.

15.2E Commentator feels that the DEIR fails to adequately address impacts of the Stanly Ranch area and offers several observations concerning Stanly Ranch related to the legislative intent and purpose of LAFCO.

Response: *See Standard Response Stanly Ranch.*

16. Chris Malan
November 18, 1996

16.1E Commentator notes DEIR statement that the City's transportation system is built out to its maximum requirements in most locations and the Draft Policy Document's recognition that "the City must learn to do more with less" with respect to transportation planning.

Response: Comment noted; no response necessary.

16.2E Commentator states that the DEIR does not consider the financial cost and environmental impacts of development of the Maxwell Bridge (aka Imola Bridge).

Response: *See Standard Response CEQA Application to General Plans* as well as Implementation Program T-1.A on page 3-11 of the Policy Document. Design details of an eventual bridge project will be subject to project level environmental review. The resulting design of the Flood Control project will also influence the eventual bridge design and may change the baseline environmental conditions in the area. The Natural Resource Policies of the General Plan that address river habitat and resource protection will also apply to consideration of a future bridge project. The Maxwell Bridge is on the list of projects to be funded by the Street Improvement Fee with $ 1 million already encumbered by the current 5 year CIP

program. An ISTEA grant application has been submitted for $ 8.7 million and additional STIP funding may be available depending on project priorities established by the CMA.

16.3E Commentator acknowledges the Draft Policy Document's commitment to developing a viable funding source to implement proposed transportation improvements, but asserts that the DEIR does not sufficiently address several issues related to roadway development.

Response: Comment noted; no response necessary.

16.4G Commentator supports the development of mass transportation, and offers several comments concerning its benefits.

Response: This policy recommendation can be presented to the City Council during hearings on the Draft General Plan.

17. Committee of Concerned Citizens
November 18, 1996

17.1E Commentators feel that the DEIR does not adequately address visual and public safety impacts in the Stanly Lane area.

Response: *See Standard Stanly Ranch Response.*

17.2E Commentators are concerned about future traffic associated with roadway improvements; they suggest that additional capacity may invite more traffic.

Response: The question of whether "relatively uncongested street" is what we wish to maintain is a policy question; the Draft Policy document attempts to retain this through its service level policy; to the extent that that policy is implemented and satisfied, the response to this question would appear to be "yes". The question as to whether widening of streets invites more traffic and subsequent development is one which is difficult to prove one way or another. Much depends on the size and location of the improvement. Without trying to be humorous, this is somewhat of a chicken and egg situation. Growth will usually not occur if there is no infrastructure to support it. On the other hand, growth can be planned in such a way and in such a location that growth and infrastructure are planned and programmed to appear jointly (if not simultaneously). The major projects proposed in the City of Napa General Plan have been identified in response to growth both within the City and in the entire Bay Area. While there may be growth-inducing elements to some of them, the consultant team believes that these are strictly secondary to the goal of supporting the growth that is contained within the land use element and other parts of the General Plan.

Response to Comment 27.26 provides additional information regarding the relationship of transportation facilities to land use.

18. Susan Levine-Roust
November 18, 1996

18.1E Commentator asserts that the DEIR was not subjected to a "proper public forum for discussion.".

Response: *See Introduction to Response to Comments.* The availability of the Draft General Plan and DEIR documents was noticed with a display ad in the Napa Register and those individuals who had requested written notice of General Plan proceedings were notified by mail. The required EIR 45 day circulation period of 10/4/96 through 11/18/96 was extended by the Planning Commission to 12/2/96 providing a total of 60 days for public review and comment. Although not required by law, the Planning Commission held two public hearings during the circulation period (10/17 and 10/24/97) to receive comments on the DEIR. The availability and status of General Plan documents has been noted at the top of every Planning Commission Agenda since October 1996. Recirculation of the DEIR with the Response to Comments will provide additional opportunity for public comment.

18.2E Commentator feels that it would be premature to pass (certify) an EIR on a general plan that has not been passed (adopted).

Response: *See Standard Response CEQA Application to General Plans.* The EIR will not be certified until public review of the Draft General Plan and the DEIR are concluded and the General Plan is ready for adoption. CEQA requires certification of an Environmental Document prior to a decision to approve a project or plan.

19. Susan Rushing-Hart
November 18, 1996

19.1E Commentator inquires about stormwater diversion in the North and North-Western areas of the city.

Response: *See response to Comment 2.3.* The maximum potential development for the Linda Vista Planning Area is 8.8% and the Vintage Planning Area is 11%

19.2E Commentator raises questions about the relationship between roadway improvements identified in the Big Ranch Road Specific Plan.

Response: *See Standard Response Big Ranch.* Circulation and Land Use details adopted with the Big Ranch Specific Plan (BRSP) in October 1996 will replace the details shown for this area in the Draft General Plan. The information in Table 3.3-2 page 3.3-5 is based on the Draft General Plan information that was released for public review prior to adoption of the BRSP.

19.3E Commentator is concerned about natural resources and habitat in and along the Salvador Channel, and suggests that the City explore the possibility of keeping an area of the city open for seasonal wetlands. See Big Ranch Specific Plan EIR -- Mitigations already specified for Salvador Channel -- already reviewed and confirmed by Fish and Game and Army Corps. Adopted Big Ranch Specific Plan has been incorporated into the Draft General Plan through an Addendum -- subject to final inclusion by the city Council upon review and action on the General Plan documents.

Response: *See Standard Response Big Ranch.* The City Council adopted the Big Ranch Specific Plan on October 22, 1996 (City Council Resolution 96-235). The mitigations from the Big Ranch SP EIR were incorporated as policies in the Specific Plan, including very detailed and lengthy mitigations related to the Salvador Channel that were reviewed and confirmed by Fish and Game and the Army Corps of Engineers.

These mitigations/policies (found on pages RC-18 through RC-23 of the Big Ranch Specific Plan) are at a much greater detail than would be found in a General Plan.

19.4G Commentator inquires generally about the composition of the Citizen Advisory Committee and specifically whether any members of the CAC reside in the Big Ranch area.

Response: Page 7 of the Draft Policy Document (under the heading "How This General Plan was Prepared") describes the planning process that started in 1991 with the appointment of a 19 member citizen's advisory committee (CAC). In order to provide a balance of citizen input, members of the CAC were selected to generally represent all areas of the City through appointment of representatives from the planning areas that are defined by the 1982 General Plan. Two members resided in the area north of Trancas and East of Highway 29; the Big Ranch Road Area is within the planning areas that these two members represented. Additional details regarding the CAC membership may be obtained from the City of Napa Planning Department.

19.5G Commentator is concerned about how the policies and programs of the Draft Policy Document relate to the seven major objectives explained in pages 12 through 16.

Response: These policy concerns can be presented to the City Council during hearings on the Draft General Plan

19.6E Commentator would like to know if future development estimate for the Vintage Planning Area in Table 2-3 on page 2-14 of the DEIR includes the 843 units approved in the Big Ranch Specific Plan.

Response: The future residential development projection for the Vintage Planning Area includes the development potential projected for the Big Ranch Area.

19.7E Commentator would like to know when water and NSD issues were resolved and implemented.

Response: *See Standard Response Water Supply and Standard Response Wastewater.* Because the commentator's question is extremely vague, a detailed response cannot be prepared.

19.8E Commentator would like to know the location, amount, and percentage of total land within the RUL of retained grasslands.

Response: A detailed inventory of grassland acreage and other habitat types was not conducted for the General Plan. The purpose of the referenced text on pages 3.7-2 to 3.7-3 of the DEIR is to generally describe where grasslands occur within the Napa region. The text further describes the types of areas where grassland remains within the RUL . The term "grassland" is not intended to imply "native grassland" when used in these descriptions. Both the DEIR and the Draft General Plan recognize that lands within the RUL are intended primarily for urban development and that retention of certain grass and other vegetative cover is important in preventing erosion and in preserving scenic qualities and habitat. Policies in the Land Use Element under Goal 9 and in the Natural Resource Element recognize the need to integrate future urban development with remaining sensitive habitats within the RUL. It should be noted that the fundamental objective of the City's General Plan is to confine urban development and avoid the need for significant expansion of the RUL that would result in impacts to significant grassland, riparian, woodland and other habitats in the un-incorporated County.

19.9E Commentator would like to know why it is not possible to retain enough open space and habitat to sustain plants and animals.

Response: As described on page 1 of the Draft Policy Document, the purpose and nature of the General Plan is to provide guidance for land use and development for all territory within the City's jurisdiction. The plan must be comprehensive in addressing all physical aspects of the community's development and state law requires a minimum of seven topics or elements of concern be addressed. These required elements include subjects that relate to the urban framework that supports the human population as well as the environmental setting and the need for integrating conservation goals with urban needs. Given the fundamental community objective to confine urban development within the RUL, it would be difficult to develop a balanced General Plan (consistent with state law) if it were to focus only on retention of open space and habitat at the expense of the other needs for maintaining a vital urban community.

19.10E Commentator requests that the existing conditions discussion of Section 3.9, Hydrology and Water Quality, of the DEIR address the floods of 1993 and 1995, and questions how development of additional land within the RUL will affect flooding issues.

Response: *See Response to Comment 2.3.* The 1986 Flood is the Flood of Record with neither the 1993 or the 1995 flood events being as significant.

19.11E Commentator is concerned about the likelihood of flooding of the Salvador Channel, given new development in the North and Northwest area of the city.

Response: *See Responses to Comments 2.3 and 19.1.*

19.12E Commentator questions the benefit of participation in the FEMA insurance program, and inquires about FEMA regulations concerning development in a floodplain or development that might cause flooding in other areas.

Response: *See Response to Comment 2.3.* The benefit of participation in the FEMA Insurance Program is that affected properties are able to both secure flood insurance and obtain the lowest possible rates. Participation in the FEMA program necessitates floodplain regulation as described in the Background Report Chapter 8.

19.13E Commentator questions the credibility of DEIR findings concerning stormwater runoff (p. 3.9-3).

Response: *See Response to Comment 2.3.*

19.14E Commentator would like to know how much land is slated for development in the North and Northwest areas, and how much new development will be drained by the Salvador Channel.

Response: *See Response to Comments 2.3 and 19.1.*

19.15E Commentator would like to know what percentage of the Napa River drainage is being left open for seasonal wetlands, as well as what percentage of the 1.62 square miles of undeveloped land in the RUL is being left as open space or seasonal wetlands.

Response: *See Standard Response Flood Control.* Approximately 4.5 square miles or 25% of the land contained within the RUL is included in the flood plain/floodway.

19.16E Commentator would like to know why the DEIR (pg.3.9-3) does not acknowledge the Salvador Channel as a natural drainageway.

Response: The referenced text lists four natural waterways in the RUL as better known examples and uses terminology that would not exclude other natural waterways that exist. The purpose of this

paragraph in the DEIR is to demonstrate that there are natural drainages in the city and that Chapter 7 of the General Plan includes broad policies to address the protection and enhancement of these features. These policies would apply to all areas where natural drainageway environments exist within the RUL. With regard to the Salvador Channel, the recently adopted Big Ranch Specific Plan and EIR address very specific mitigation measures related to this drainage feature which have been reviewed and confirmed by the Army Corps of Engineers and the California Department of Fish and Game.

19.17E Commentator would like to know how the DEIR can conclude that VMT growth rate will be lower than the projected population growth rate.

Response: The question relates to a quotation of the standard for significance as defined by the Bay Area 1994 Clean Air Plan. The Draft EIR does not claim to meet this standard; however, on page 3.10.3, the document clearly outlines its response to this standard, including the computations undertaken and the sources of the analysis.

19.18E Commentator questions the cited average vehicle speeds cited on page 3.11-2 for Soscol Avenue-Silverado Trail and Big Ranch Road-Trancas.

Response: The referenced page shows the table of noise contours. An average speed was assigned for the purposes of projecting the potential noise contour given the amount of traffic projected for these streets. The table is not intended to demonstrate the maximum speed limit as this may change during the term of the Plan.

19.19E Commentator questions whether Sierra Avenue is no longer considered a collector, and, if not, would like to know how the reclassification will affect surrounding streets.

Response: Sierra Avenue is currently listed in Table 3.11.2 of the Draft EIR as well as Figure 3-1 of the Policy Document as a collector street. The Policy Document will be revised as necessary to reflect changes to street designations to be consistent with the adopted Big Ranch Specific Plan.

19.20E Commentator does not understand how the DEIR identifies no significant unavoidable adverse impacts when the Big Ranch Specific Plan EIR noted several.

Response: *See Standard Response Application of CEQA to General Plans and Standard Response Big Ranch.*

19.21E Commentator expresses concern about the loss of open space resources in the Napa Valley.

Response: *See Response to Comments 19.8 and 19.9.* The commentator describes the primary concerns that have driven General Plan policy in both the City and County of Napa for over 20 years. Constraining urban development within the existing cities in the county will sacrifice some remnants of fragmented open space and habitat in these jurisdictions in order to achieve significant conservation of the unique and valuable resources that make Napa County world famous for its agriculture and scenic attributes.

19.22E Commentator is curious about the 6,000-person difference between the 1990 population number cited in Table 4-1 on page 4-3 of the DEIR and estimates published by ABAG.

Response: The Association of Bay Area Governments (ABAG) prepares projections for growth in Bay Area communities every other year by consulting with cities and counties and then by making adjustments to the base data through an assessment of regional trends. The resulting "predictions" are not always comparable to the census. The ABAG figures for 1990 shown in Table 4-1 on page 4-3 of the DEIR show what ABAG had predicted for 1990. The purpose of showing historic projection figures is to demonstrate

the trends that future projections are based on. The commentator correctly observed that AGAB's projection to 1990 (which was probably made in the 1980's) was greater than the actual 1990 RUL population included in the City's population data on the table. It should be noted that the ABAG projections are for the total area within the City's RUL, including unincorporated land as well as the State Hospital; the City's projections to 2020 are based on this area as well; however, the census population is based only on population within the incorporated City Limits. The 1990 census counted 61,842 persons within the incorporated boundaries of the City.

20. John Rutherford
November 16, 1996

20.1E Commentator is heartened by the conservative nature of the DEIR, but is concerned about previously-disclosed impacts of a very large development project in the city.

Response: *See Standard Response Stanly Ranch.*

21. North Bay Association of Realtors
November 15, 1996

21.1G Commentators are concerned about the growth-slowing effect of the RUL, and encourages the addition of more MU-designated areas

Response: These policy concerns can be presented to the City Council during hearings on the Draft General Plan.

21.2G Commentators support the addition of an economic element to the General Plan and recommend that land use projections be included in the new element.

Response: *See response to Comment 1.1.*

22. Cathy Zeller, et. al.
November 18, 1996

22.1E Commentators are opposed to the extension of Souza Lane east of Capitola Avenue, citing numerous arguments against the extension.

Response: During the review of a recent subdivision application in the area designated for the Sousa Lane extension, the City Council directed staff to take the necessary steps to eliminate this road segment from the General Plan. A supplemental traffic analysis has been conducted by Dowling Associates (the City's General Plan traffic consultant) which concludes that the Sousa Lane segment can be eliminated

provided that the Saratoga road connection is implemented. An addendum to the Draft Policy Document will be prepared pursuant to the City Council's direction on this matter.

23. Dennis Scherizinger
November 18, 1996

23.1E Commentator provides updated numbers concerning the potential yields of the City's water supply sources, arguing that these supplies are barely sufficient to address current demand, let alone demand generated by additional development.

Response: *See Standard Response Water Supply.*

24. Friends of the Napa River
December 2, 1996

24.1G Commentator welcomes the generally enlightened and sensitive approach to balancing growth concerns with protection of natural resources and quality of life reflected in the Draft General Plan.

Response: Comment noted; no response necessary.

24.2G Commentator does not feel the Draft General Plan has given sufficient focus and attention to the Napa River, including failure to recognize the river within the seven project objectives.

Response: *See Standard Response Flood Control.* The objectives cited by the commentator are DEIR distillations of the objectives described in the Draft Policy Document, which do mention the river.

24.3E Commentator feels that the Draft Plan contains too many vague and ambiguous policies, implementation programs, and mitigation measures, and that the DEIR's discussion of alternatives in confusing and incomplete.

Response: The City acknowledges the comments but disagrees with them. No response necessary.

24.4G Commentator is concerned that the City Council and Planning Commission may override the General Plan and not implement its provisions.

Response: By law, the City Council and Planning Commission cannot take any action that is inconsistent with the General Plan or any specific plan but may amend either plan when they deem it to be in the public interest.

24.5G Commentator recommends that the City create a separate element addressing the Napa River that consolidates all policies and programs associated with the river.

Response: *See Response to Comment 2.2G.*

24.6G Commentator suggests preparing a specific plan that covers the urban reaches of the Napa River, specifically Planning Areas #8 and #9, and that the General Plan include a specific land use designation(s) for the river corridor.

Response: : *See Standard Response Flood Control and Response to Comment 2.1.* The City has recently become involved in the land-side planning related to the Flood Control Project.

24.7G Commentator requests that the General Plan explain in detail and incorporate as policy the Flood Management Plan's concept of a multi-objective project that accomplishes both flood protection and river restoration.

Response: *See Standard Response Flood Control and Response to Comment 2.1.* Policies HS-3.5 through HS-3.9 and NR-1.1, NR-1.4, NR-1.5, NR-1.6, NR-1.8 apply. In addition, Programs NR-1.A through NR-1.D provide the means of implementation.

24.8G Commentator requests that the General Plan more fully and clearly embrace the urban downtown riverfront as key to the revitalization of Downtown Napa. Commentator argues for the preparation of a specific plan and adoption of development and design guidelines for the river corridor.

Response: *See Response to Comments 24.6, 2.1 and Standard Response Flood Control.*

24.9G Commentator suggests the General Plan include an implementation program to negotiate an agreement with Napa County to support the goals of the urban riverfront.

Response: *See Standard Response Flood Control.* It is assumed that the County's involvement in the flood control project implicitly binds them to any of the implementation details that are a result of an adopted program.

24.10E Commentator requests that the Draft Plan and DEIR include more extensive discussions of aesthetic issues and impacts.

Response: The comment provides some interesting ideas; however, several alternatives were considered during the lengthy CAC process and the scenario that the Draft General plan is based on is that which the City Council confirmed in the Concept Report. If the Council wishes to consider any of the elements of the alternatives presented in the comment, they may do so and direct staff accordingly during the General Plan hearing process. With regard to Aesthetic consideration, several policies are proposed in the Land Use Element that require guidelines for residential, commercial and downtown development to achieve a more attractive and functional urban environment. As noted in the DEIR, these policies are considered as mitigation measures as well.

24.11E Commentator requests that the Draft Plan and DEIR more thoroughly address transportation and parking issues, with an emphasis on multi-modal travel.

Response: Comment acknowledged; the City believes that the multi-modal policies incorporated into both the Land Use and Transportation Elements of the Policy document adequately address these issues in the context of this General Plan.

24.12G Commentator suggests several additions to the Draft General Plan, including several maps

Response: Comment noted; no response necessary.

24.13G Commentator suggests revision to Program LU-6A; implementation program regarding business

incentive program and design guidelines; guidelines for downtown should address design alternatives that incorporate the Napa River as a natural resource/environmental/cultural focus.

Response: The implementation program is written to reflect design alternatives that incorporate the Napa River as a commercial and recreational focus. The very fact that the Napa River is a natural resource and has environmental issues associated with development around it will be addressed within the above context. The downtown itself is viewed as the cultural hub of the community, the cultural role the River plays will be incorporated into the program as appropriate. It is the intent of the program to prepare a plan whose focus is to promote high quality public and private redevelopment and development in downtown, with the Napa River as a vital component of the plan, not the primary focus.

24.14G Commentator suggests revision to Policy LU-9.2.

Response: During the public hearings on the General Plan the City Council will review policies and determine if they adequately respond to the goals and objectives for the community. Any suggested revisions to policy text will be subject to City Council review and consideration at that time. *See Response to Comment 19. 9* regarding the need for a balanced, comprehensive approach to policy development in the General Plan.

24.15G Commentator suggests revision to Policy LU-9.3.

Response: *See Response to Comment 24.14.*

24.16G Commentator suggests revision to Policy LU-9.4.

Response: *See Response to Comment 24.14.*

24.17G Commentator suggests revision to Policy LU-9.5.

Response: *See Response to Comment 24.14.*

24.18E Commentator suggests adding another objective under Natural Resources that emphasizes maintenance of a "living river."

Response: *See Standard Response Flood Control and Response to Comment 24.7.*

24.19E Commentator suggests revision to Chapter 7, Natural Resources, introductory discussion of wetland habitat.

Response: The text referenced in Chapter 7 is not in the form of policy but is descriptive in nature and is not intended to be directive. It acknowledges that there are opportunities for enhancement and protection of areas with wetlands while accommodating the remaining development envisioned by the Plan. Policies and programs that address this subject include NR-1.5, NR 1.6, NR-1.A, LU-9.1, LU-9.2, LU-9.4 and LU-9.5.

24.20E Commentator suggests revision to Chapter 7, Natural Resources, introductory discussion of pollution.

Response: *See Response to Comment 24.19* regarding the purpose of the text. Also see Policy NR-3.3, CS-11.5, CS-11.6, CS-11.7 and the Policies under Goals NR-4 and HS-7.

24.21E Commentator suggests revision to Policy NR-1.3.

Response: This policy is intended to provide support for any number of opportunities for enhancing natural habitats through additional native planting. This could occur during the review and "requirements" made on private development projects or as support of community projects or private organization programs for enhancing native habits.

24.22E Commentator suggests revisions and additions to Policy NR-1.4 related to waterway improvement (flood control, dredging etc.) to minimize effects on riparian habitat.

Response: Environmental review of these projects will tend to dictate what mitigations will be necessary or desired. The Draft General Plan contains policies for riparian enhancement throughout the RUL that would apply to waterway improvement projects. Any changes to Draft GP policies could be considered by the City Council when they hold hearings on the General Plan.

24.23E Commentator suggests revision to Policy NR-1.6.

Response: The provisions of the policy are consistent with acceptable mitigation practices. Project level CEQA review will provide guidance as to the appropriate mitigations. Project review will also be subject to Fish and Game, Army Corps and other agency referral as required to confirm whether off site mitigation is appropriate or feasible.

24.24E Commentator suggests revision to Policy NR-1.10 regarding management practices for reducing the impact of pollution from urban activities through the construction of additional wetlands.

Response: This is a subset of Policies CS-11.5 , CS-11.6. and CS-11.7 Public Works has no objection to the inclusion of constructed wetlands as one possible urban storm water BMP; however, the practicality of implementing this technique with smaller infill projects is limited.

24.25G Commentator suggests revision to Policy NR-1.12 regarding provision for the use of permeable or semi-permeable materials for parking lots and other off-street paved areas.

Response: The comment is fine in theory but falls short in practice. The trade off between some increased permeability versus maintainability with its associated liability issues does not justify a policy change. The commentator requests that the terminology in Policy NR-1.12 be changed to a more mandatory tone. The intent of the draft policy is to allow consideration of permeable surfaces as an alternative to paving on a project by project basis, provided maintenance and liability issues can be addressed to the City's satisfaction.

24.26G Commentator suggests revisions to Chapter 7, Natural Resources, introductory discussions of habitat corridors and aquatic recreation.

Response: *See Response to Comment 24.19* regarding the purpose of the referenced text. The first suggestion in the comment would add text that would imply that the only way to obtain open space habitat corridors is during the subdivision process. Given the fragmented nature of remaining land for subdivision in the RUL that is adjacent to habitat, the suggested text would reduce opportunities and preclude consideration of other alternatives for obtaining open space easements on private, developed lands. The second suggested text change offered by the commentator clarifies the intent of the discussion. A "no wake zone" is implemented with an enforceable 5 mph speed limit.

24.27G Commentator feels that natural resource implementation programs scheduled for implementation in FY 2002 to 2004 (page 7-5) are too distant to provide intended benefits.

Response: The timing of implementation programs is subject to 1) the City's financial and staff resources; and, 2) determination of priorities with other important General Plan policies and programs. These decisions, and any changes to implementation timing, are subject to consideration and prioritization by the City Council during the public hearings on the General Plan and subsequent budgets.

24.28G Commentator suggest addition of paragraph to Chapter 7, Natural Resources, introductory discussion of groundwater (page 7-8).

Response: The text of the Policy Document will be revised as suggested.

24.29G Commentator suggests revision to Policy NR-4.3 regarding the monitoring of dredging effects in the he Napa River.

Response: Dredging is zero sum in terms of groundwater effects. Materials are neither added nor removed from the land mass supporting the aquifer.

24.30G Commentator suggests new Policy NR-3.4 encouraging watershed management practices.

Response: The comment is a subset of Policy NR-3.1. Language that carries a policy to an implementation level is subject to consideration by the City Council during hearings on the General Plan.

24.31G Commentator suggests new Policy NR-4.7 concerning groundwater replenishment.

Response: The policy recommendation can be presented to the City Council for consideration during hearings on the Draft General Plan.

24.32E Commentator suggests new Policy NR-4.8 prohibiting undergrounding or covering of creeks.

Response: This is inherent in the Natural Resource Conservation Policies but is more restrictive and begs the definition of creek, stream, etc. It should be recognized that it would be extremely difficult and impractical to address the health and safety issues related to storm drainage in an existing, built out, urban environment without using subsurface drainage structures.

24.33E Commentator suggests new Policy NR-4.9 concerning management of pesticide- or fertilizer-tainted runoff.

Response: This concern is addressed through Policies CS-11.5, CS-11.6, and CS-11.7.

24.34G Commentator suggests new policy NR-4.10 supporting maintenance of a geomorphically stable river.

Response: *See Response to Comment 24.18.* This is the subject of much scholarly debate. It would seem that the Napa River in the City of Napa is doing exactly what Mother Nature expects. The higher sloped upper regions of the river support higher velocities that erode the land form and transport the materials to the lower reaches of lesser slope where velocities decrease and deposition occurs. The occasional higher velocities encountered during flood events in turn carry the natural depositions seaward allowing the cycle to be repeated.

24.35G Commentator suggests new policy CS-11.10 discouraging use of creeks to carry stormwater runoff.

Response: The idea that "no creek should be required to carry more runoff than predevelopment" is relative. If the requirement were stated in terms of the frequency of return of a storm event it becomes quantifiable and may be desirable from a floodplain management standpoint.

24.36G Commentator requests revision to flood control discussion on page 16.

Response: *See Standard Response Flood Control.*

24.37G Commentator suggests supplemental text for discussion of flooding in Chapter 8 (page 8-9).

Response: The thrust of the suggested text is floodplain management that is already contained in Policies HS-3.3 and HS-3.4 and the City's Floodplain Management Regulations.

24.38G Commentator requests that the policies under Goal HS-3 (flooding) be reevaluated to correct inconsistencies.

Response: The inconsistencies are the reader's perception. The Floodplain Management Regulations are in fact a balance between unlimited development and a development prohibition. The Floodplain Management Regulations attempt to strike a balance between the Health and Safety responsibilities of the City and private property rights.

24.39G Commentator suggests revision to Policy HS-3.2 regarding management of floodplain regulations.

Response: The Floodplain Management Regulations appropriately deal with the suggested revision.

24.40G Commentator suggests revision to Policy HS-3.6 regarding City support of programs and methods to reduce the flooding of the Napa River and tributaries.

Response: The comment is editorial and repetitive of other policies and regulations. No response necessary.

24.41G Commentator suggests new policy HS-3.10 concerning flood control channels.

Response: As pointed out on Page 4-14 of the Draft Policy Document, the City has no jurisdiction in most cases, but does work in cooperation with responsible agencies to achieve the suggested result.

24.42G Commentator suggests new policy HS-3.11 committing the City to assist homeowners and businesses in the floodplain with floodproofing.

Response: Draft Policy HS-3.9b is intended to address this issue.

24.43G Commentator suggests new policy HS-3.12 committing the City to assist property owners to locate outside of the floodway and floodplain.

Response: This is inherent in Policies HS-3.1 and HS-3.2.

24.44G Commentator suggests new policy HS-3.13 prohibiting property owners in the floodplain of the Napa River or its tributaries to add fill to their property.

Response: This concept is also inherent in Policies HS-3.1 and HS-3.2. Fill within the floodplain and floodway are regulated by City of Napa Code Chapter 17.62.

24.45G Commentator provides guidelines for urban riverfront, as referenced in comment 24.8.

Response: The City of Napa has received the Friends of the Napa River's "Interim Guidelines for the City

of Napa's Urban Riverfront.." The City will provide copies of these guidelines to those working on the development of design guidelines for the City.

25. Friends of the Napa River
December 2, 1996

25.1E Commentator suggests revision to economic development discussion on page 2-10 of the DEIR.

Response: The text at the bottom of page 2-10 in the DEIR has inadvertently been omitted. The sentence needs to be completed by adding: "....*Food and the Arts, and promotion of the Downtown as a 24 hour destination, serving as a key element of the City's tourist economy as well as the City's regional/local retail and administrative center.*" The text offered by the commentator focuses on the Urban Riverfront; the purpose of the DEIR paragraph is to summarize the economic development trends anticipated by the Draft General Plan.

25.2E Commentator requests that the DEIR address the impacts of flood control on growth and development more specifically and carefully, particularly the growth-inducing effects of flood control improvements.

Response: *See Standard Response Flood Control and Response to Comment 24.18.* Implementation of the flood control project would not extend the city's boundary or expand urban services into new undeveloped areas; but, instead would enable development, and in some cases redevelopment, of land in the urban core that has been historically impacted by the threat of flooding. These areas have always been assigned a land use designation and development has been allowed pursuant to the flood plain regulations and FEMA requirements. The Draft General Plan continues to assign land use designations to this area, mostly the MU-Mixed Use designation, and continues the policy of applying flood plain and FEMA requirements to development. The ultimate development potential of the MU designation was considered in the total development potential for the draft General Plan; however, as with the current General Plan development scenario, development is not likely to achieve the maximum potential as long as flood impacts exist. As stated in the General Plan DEIR, the fundamental City policy of confining development within a defensible RUL line addresses the potential for growth inducement by efficiently utilizing the vacant infill parcels within the City, including the underdeveloped areas that may be enhanced for development by a flood control project.

26. Moira Johnston Block
December 2, 1996

26.1E Commentator strongly opposes development in the 13 acres west of Foster Road, stating that the potential visual impact associated with such development has not been mitigated.

Response: *See Standard Response RUL and Response to Comments 19.9 and 19.21.*

27. Sierra Club Napa County Group
December 2, 1996

27.1E Commentator feels that the DEIR is premature because the Draft General Plan contains too many outstanding issues.

Response: The City disagrees with the commentator's assertion. Updating a general plan is a process designed specifically to identify and address major development and environmental issues, and the EIR is an important tool in exploring and helping resolve these issues. Section 15123 of the State CEQA Guidelines specifically recognizes the evolutionary nature of the decision making process and the role of the EIR by requiring that the EIR identify: "Areas of controversy known to the lead agency, including issues raised by agencies and the public" ; and, "Issues to be resolved including the choice among alternatives and whether or how to mitigate the significant effects". The comment and response process helps to explore issues. All of this information is eventually presented to the City Council for final consideration during the public hearings on the General Plan Documents. Also see Response to Comment 18.2.

27.2E Commentator feels that many of the policies cited in the DEIR as mitigation are not specific enough.

Response: *See Standard Response CEQA Application to General Plans.* The City disagrees with the commentator's assertion. At the general plan level, policies such as LU-3.2 and LU-9.2 are useful and adequate mitigation measures. Even without specific implementation programs, these policies must be implemented through zoning, subdivision approvals, public works decisions, and similar actions which must by state law be consistent with the General Plan.

27.3E Commentator feels that the DEIR's findings of significance related to the Stanly Ranch project are flawed.

Response: *See Standard Response Stanly Ranch.*

27.4E Commentator takes issue with the DEIR's finding of the Draft Policy Document's consistency with the Airport Land Use Compatibility Plan (ALUCP).

Response: Pages 8-33 through 8-36 of the Background Report provide baseline information regarding the details and applicability of the Airport Land Use Compatibility Plan (ALUCP) to development in the City. Discussion and policies related to future applicability of these regulations are included in pages 8-18 to 8-22 of the Policy Document. The combined information in both documents provides adequate support for the impact conclusions presented in the DEIR. A complete set of draft EIR and General Plan documents was sent to the Airport Land Use Commission for comment at the beginning of the circulation period. The referenced text concerning a provision for a local jurisdiction to overrule the ALUC's determination is taken directly from the ALUCP and is a procedure provided by state law.

27.5E Commentator takes issue with the DEIR's finding that conversion of agricultural land in Stanly Ranch is insignificant impact.

Response: *See Standard Response Stanly Ranch.*

27.6E Commentator feels that the DEIR and Draft Policy Document conflict with one another concerning statements about environmentally sensitive areas.

Response: The first DEIR text that is cited from Section 3.2 is descriptive narrative, not prescriptive policy. The reference to usable acreage not including environmentally sensitive areas is describing how the capacity calculation for vacant land was conducted. It refers to the site specific capacity assessment based on environmental constraints as described on pages C-4 and C-5 in Appendix C of the Policy Document. The second referenced text from the Draft General Plan Policy document page 1-1 is and introductory description of the Plan concept that recognizes that by containing growth in the RUL on infill property, development will, in some cases, be on sites that are constrained from maximum development by natural features and steep terrain. The Draft General Plan Land Use Element, Natural Resource Element and Health and Safety Element contain numerous policies that address the issue of integrating development with resource protection goals.

27.7E Commentator feels that the DEIR does not adequately address land use impacts within the RUL or expansion of the RUL, particularly as they relate to the Big Ranch, Stanly Ranch, and Foster Road areas.

Response: *See Standard Response RUL and Standard Response Stanly Ranch.* The policy recommendation concerning specific plans for Big Ranch Trancas and Foster Road can be presented to the City Council during hearings on the Draft General Plan.

27.8E Commentator argues that the analysis of ag land conversion impacts should be absolute, not relative to existing plans and regulations (i.e., general plan and zoning).

Response: Comment acknowledged; the DEIR text has been revised in response to this comment.

27.9E Commentator feels that the DEIR does not adequately address the effects of expanding the RUL to encompass the Napa State Hospital. The commentator takes particular issue with the DEIR's argument that the Hospital grounds are already urbanized.

Response: *See Standard Response RUL.* The Draft General Plan designates the entire State Hospital site as Public Serving (PS) and ascribes no new development potential to the area. Any future private development on the State Hospital property would require a general plan amendment, rezoning, and environmental review.

27.10E Commentator does not feel that the DEIR adequately addresses the effects of expanding the RUL to include the Foster Road area.

Response: *See Standard Response RUL.* The Foster Road area is surrounded on three sides by incorporated land and services are available as with the adjacent city properties. Safety services are available as described under Response to Comment 27.32.

27.11E Commentator is concerned that the proposed RUL expansions are inconsistent with the expansion criteria set out in Policy A-2.1 of the Draft Policy Document.

Response: *See Standard Response RUL*

27.12E Commentator feels that the discussion of growth management in the DEIR is inconsistent with the policy commitments of the Draft Policy Document, particularly as concern the RUL and growth management.

Response: *See Standard Response RUL.* As described in the Standard Response, there are currently no specific policies to guide the consideration of RUL expansion requests. The policies in the

Administration Chapter provide a clear set of criteria for RUL amendment requests, and also impose the requirements of Measure J, which currently only applies to the County General Plan.

With regard to growth management; In addition to the policies to contain growth within the RUL, the policies listed on page 1-11 through 1-12 of the Draft Policy Document carry forward the growth monitoring program that has been in effect since adoption of the 1982 General Plan. The city's location on the fringe of the Bay Area along with the combination of policies that affect the amount and rate of growth in Napa have proven to be effective since adoption of the 1982 plan as demonstrated by the average 1.3 percent growth rate that was experienced between 1980 and 1990, a period of favorable economic conditions when annual growth rates experienced by other Bay Area communities were as much as 4 to 5 percent (Growth Management discussion, pg 1-11 of Policy Document). Policy LU-3.7 and Implementation Programs LU-3.B and LU-3.C carry forward the growth monitoring practices that the City has engaged in over the last 15 years. Monitoring includes monthly review of building permit activity and participation in the filing of an annual report with the State Department of Finance which summarizes annual development activity. In the past, development rates viewed over a 4 to 5 year increment have been consistent with the uniform rate of development anticipated for the planning period; in fact, for the most part, the rate has been below the straight line average anticipated by the 1982 Plan. The 2020 plan is based on a straight line growth rate projection of slightly over 1 percent. If this method of monitoring shows a peak in development which is continually above the projected development rate, staff will initiate formal reports to the City Council and engage in discussion of more aggressive growth management possibilities in order to ensure that capacity in the RUL is not outpaced by development during the planning period. This existing process is supported by Policy LU-3.7 in the Draft Policy Document.

27.13G Commentator requests deletion of Policy A-2.1

Response: This policy recommendation can be presented to the City Council during hearings on the Draft General Plan.

27.14G Commentator requests abandonment of RUL expansions encompassing the State Hospital and the area west of Foster Road.

Response: This policy recommendation can be presented to the City Council during hearings on the Draft General Plan.

27.15G Commentator suggests a new policy establishing a Resource Area (RA) designation to be applied to seriously constrained lands.

Response: The PS designation is intended to apply to such areas. Resource protection policies are intended to apply to sensitive areas regardless of their land use designation. The City Council could consider a refinement of the PS land use designation during public hearings on the draft General Plan.

27.16G Commentator suggests a new implementation program that calls for designation of several areas in the Planning Area as Resource Area (RA).

Response: *See Response to Comment 27.15.*

27.17G Commentator suggests a new policy that would establish, in cooperation with the Napa County Land Trust, a permanent greenbelt with linkages to trails and wildlife corridors.

Response: The discussion on page 1-21 of the Draft Policy Document addresses the City's desire to maintain city centered urban growth and includes reference to encouraging the purchase of open space or

development rights to protect the greenbelt and RUL policies. The potential for future implementation will be based on fiscal limitations, and will not be limited by General Plan policy. An Addendum to the Draft Policy Document has been prepared that carries forward the greenbelt designation for county lands surrounding the city. This designation implies only a policy intent since these lands fall under the County's jurisdiction. The additional details outlined in the comment would be subject to the consideration of both the City Council and the Board of Supervisors and would not be appropriate to incorporate into the City's General Plan unless there is mutual agreement between the two jurisdictions.

27.18G Commentator suggests a new implementation program to establish an open space/greenbelt buffer zoning classification to be applied to the edge of the city.

Response: *See Response to Comment 27.17.* Also refer to Addendum # 2, which revises the Draft Policy Document to include the continuation of the Greenbelt designation of properties outside the RUL.

27.19G Commentator suggests revisions to Implementation Program LU-6.A. (Business incentive program and design guidelines to promote high quality development downtown)

Response: *See Response to Comment 24.13.*

27.20G Commentator suggests revisions to Policy LU-9.2.

Response: The suggested modification to LU-9.2 which would require a 1/4 mile buffer between development and natural areas would severely limit the modest potential for infill development on remaining lands within the RUL. The infill development strategy is intended to provide for growth without the need to significantly expand the RUL. The policies under Goal LU-9 and the resource protection policies in the Natural Resource Element reflect the protection practices that are effective given the urban influences that already exist in the RUL. These measures are also acceptable to the resource agencies that have jurisdiction and regulatory authority over these areas. If the limited remaining infill development opportunities within the RUL are further restrained, then the pressure to significantly expand the RUL will come sooner than the year 2020.

27.21E Commentator takes issue with the DEIR's assumptions that the roadway improvements identified in the DEIR will be in place to mitigate traffic impacts.

Response: *See Response to Comment 13.5.* Note that the roadway improvement projects listed as mitigations in the DEIR are extracted from the Policy Document Table 3-1 on page 3-4 and are also addressed in Policies T-1.9, T-1.A, T-1.D and supported by other policies in the Transportation Element.

27.22E Commentator takes issue with DEIR's approach to determining the significance of traffic impacts.

Response: *See Response To Comment 10.10.* With regard to the use of service levels as an adequate standard against which to measure impacts, it is the traffic consultant's understanding that an impact is best measured against a standard. Potential impacts are compared to standards of community acceptability. When those standards are exceeded, then an impact is defined. Service Level standards are the City of Napa's standard for measuring the quality of traffic service, and the EIR properly compares buildout traffic conditions to the standards set in the DGP. There are no "standards" for traffic volumes, in this General Plan or in any General Plan of which the authors are familiar. The volumes are used as input to the Service Level computation, and in that way, become directly involved with application of the standard. Traffic volume estimates have been prepared by the consultant and are available for inspection.

In paragraph 2 of this comment, the commentator states that the DEIR "attempts to explain away the impact by stating that it would simply be too expensive to mitigate." It is unclear how the commentators

arrived at that statement since no citation is provided. *See Response to Comment 13.5* regarding potentially significant impacts resulting from uncertainty of future improvement funding.

27.23E Commentator feels that the DEIR does not disclose the impacts of development (extensions, widenings) of the roadways cited as mitigation to traffic impacts. The commentator further takes issue with the DEIR assumption that the City can build itself out of traffic problems caused by development.

Response: *See Standard Response CEQA Application to General Plans and Response to Comment 16.2.* Regarding the feasibility of project (i.e. mitigation) funding, see Response to Comment 13.5. The last paragraph of the comment is the commentator's opinion; no response necessary.

27.24G Commentator concludes that the City is not serious about promoting bicycle travel because the Draft Policy Document does not include an implementation program identifying funding responsibility.

Response: *See Response to Comment 27.2.* As described in the Introduction to the Policy Document (pages 16 & 17), the lack of a corresponding specified implementation program does not negate the City's commitment as stated in Policy. Implementation programs are indicated when budget and staff are available to pursue the specifics of the program base on the evident priorities of the community. Identification and prioritization of General Plan programs will be subject to the City Council's consideration during the General Plan hearings. The question raised by the commentator can be presented at that time.

27.25E Commentator takes issue with the DEIR's assertion that the "transportation system is well developed . . . "(page 3.3-1).

Response: Comment noted; no response necessary.

27.26E Commentator feels that the DEIR ignores the impacts on neighborhood character caused by transportation improvements identified in the Draft Policy Document.

Response: *See Standard Response CEQA Applications to General Plans.* Projects outlined in the Transportation Element, including some road widening, outlined in the General Plan, will primarily take place on major roadways in the City and not on local streets in residential neighborhoods. The introductory discussion in the Transportation Element of the Draft General Plan Policy clearly sets the tone for transportation planning to respect neighborhood character. The Element recognizes the environmental and fiscal impacts of focusing planning policy toward the needs of the automobile and states on pg. 3-1 that:

> *"While the automobile is expected to continue to be a primary mode of transportation, continued over dependence on the personal automobile has high environmental and monetary costs. As streets are widened or built, they are quickly filled by vehicles, creating a need for additional widening. Numerous multi-lane, congested streets diminish the community's surrounding noise levels and degrades air quality. .....*
>
> *If there is a consistent theme for Napa's transportation planning as it approaches a new century, it is that the City must learn to do more with less. Napa's road system is largely built and is unlikely to change much over the next 25 years. There is less money for improvements, not only for roads but for transit and other modes. There is also a desire to somehow reduce the impacts of traffic on neighborhoods."*

Policies such as lowering the LOS Standard to D and promoting alternative transportation choices have been included to reduce the level of road improvements needed to satisfy planned growth. In essence, the citizens will need to experience increased "inconvenience" in using the automobile and take advantage of alternative transportation in order to preserve other more important aspects of Napa's urban environment.

27.27E Commentator takes issue with DEIR's discussion of public transportation impacts, particularly with respect to the City's bus system.

Response: The commentator concludes that "the public transportation system fails to provide mitigation for the impacts of this plan in at least some instances." This is a statement of opinion; the authors of the DEIR note that in no case is the plan constructed on the assumption that the public transportation system should serve as mitigation. Public transportation is a stand-alone service intended for a variety of purposes; however, mitigating the impacts of the General Plan is not one of them, and the DGP does not make this claim.

The Draft General Plan Background Report provides a brief summary of public transit service. The City of Napa has adopted a policy for public transportation which emphasizes broad coverage and basic service standards for the transit system. The Short Range Transit plan (SRTP), a federally-mandated document updated and adopted by the City annually, sets a policy goal of providing a bus rout within 1/4 mile of 85% of dwelling units within the City, with headways (time between buses) to be set minimally at one hour. Based upon demand, these headways are decreased when ridership reaches 35 passengers per revenue hour of service. Three routes have half-hour service. Two routes, to the northern areas of the City where residents are more affluent and less transit dependent, have hourly headways. These two routes do not yet produce 35 passengers per revenue hour of service, the benchmark for decreasing headways.

In addition, the focal point of the system, by policy, is Downtown Napa. Thus, all routes begin and end in Downtown, with timed transfers between routes. For a small urbanized system, the VINE has very good productivity, with 26 passengers per revenue hour of service carried systemwide.

The Draft General Plan contains a policy framework for expansion, improvement, coordination, and modifications to the transit system, as well as providing for a more active role by developer in contributing to transit improvements, as funding resources, demand, and population grow. Further, the role of Napa Valley Transit's growth is highly dependent upon other jurisdictions in the County that fund NVT and which are parties to the policy direction set for NVT. These affect not only Napa, but all of the other cities and a large portion of the unincorporated areas of the county, beyond the jurisdiction of this Draft General Plan.

27.28E Commentator suggests that the DEIR cite Policy T-10.1 as potential mitigation for impacts related to increased resident and tourist traffic into and out of the Napa Valley.

Response: Comment noted; no response necessary.

27.29E Commentator suggests a new policy that would require all projects that might impact river and creek habitat to avoid or fully mitigate potential impacts.

Response: *See Standard Response CEQA Application to General Plans.* This policy recommendation can be presented to the City Council during hearings on the Draft General Plan. Additional projects that could impact the river or creek habitat would be subject to CEQA review.

27.30G Commentator suggests a new policy that would call for the City to create a tourist shuttle system.

Response: *See Response to Comment 27.24.* A specific commitment to the funding and development of a City operated model shuttle system as an implementation program in the General Plan will be subject to consideration by the City Council during public hearings on the Plan. The Draft General Plan provides sufficient policies to support the concept if the opportunity is available in the future.

27.31G Commentator suggests a new implementation program calling for the City to cooperate with the Congestion Management Agency to promote a regional shuttle system with staging areas on the south edge of the city.

Response: *See Response to Comment 27.30.* The City, as a member of the CMA, will cooperate in supporting the implementation of regional projects that are included in the CMP. At present, the CMA is considering a variety of project combinations to improve transportation in the County, including the combination of highway and enhanced transit projects. Draft General Plan policies do not preclude the City's ability to support the suggested program if it should become a CMA priority and receive funding.

27.32E Commentator questions DEIR conclusion that expansion of the RUL will not increase police and fire response times. Commentator also questions the DEIR's assumption that the Napa State Hospital will continued to be served by State Police.

Response: *See Standard Response Stanly Ranch and Standard Response RUL.* In addition, the following information is offered:

Fire Department
Fire Department response times will not increase since all of the proposed RUL expansions are adjacent to of the city limits and within the same distance range as other incorporated land. If the Stanly Ranch area is developed, its impacts on the delivery of fire service will be addressed in the specific plan and EIR prepared for a proposal to develop the area. Preliminary discussions have always included a public safety fee to pay for services.

Currently, all new development pays a Fire and Paramedic Development Fee to provide for constructing and equipping an additional fire station. This fee was developed to offset the impact of new development on existing resources.

Police Department
The DEIR , acknowledges that development accommodated by the Draft General Plan would increase the demand for police services but would not be expected to adversely affect response times (pg. 3.4-5 #1). It goes on to state that the Draft General Plan Policy Document contains policy recommendations to ensure that additional police staffing be added commensurate with whatever growth does occur.

A police department's response time is determined by four factors:

1. The number of officers deployed on the street at a given time.
2. The number of calls for service pending at that same time.
3. The priority (urgency) of the pending calls.
4. The distance from whence they are responding.

Unlike a fire department, police officers do not respond from a fixed station but rather respond from wherever they happen to be when the call is dispatched. Wherever they happen to be is determined, for the most part, randomly. Therefore, development at the edge of the RUL does not necessarily mean increased response times if sufficient officers are deployed to handle the calls for service.

In reference to the comment that "The DEIR also fails to analyze the potential need for police services on Napa State Hospital (NSH) property once it is annexed to the City... ..", it should be noted that the City of Napa Police Chief is a member of the Napa State Hospital Task Force which meets regularly with NSH staff. At the present time, there are no plans to sell any portion of NSH for private development. In fact, the Department of Mental Health is proposing an expanded use of existing facilities and a corresponding increase in the Hospital Police force, which would make them the largest law enforcement agency in the county. It is the intent of the Director and the Hospital Police Chief to increase the scope of responsibilities for Hospital Police. However, the City has no control over what future governors, Department of Mental Health directors, or hospital administrators may do in the future.

27.33E Commentator feels that development in the Foster Road RUL expansion area will be subject to increased fire hazard, which could adversely affect fire protection services.

Response: The City will not be faced with any significant difficulties in providing water to the area of RUL expansion west of Foster Road. The surrounding area is currently served by City water and while there are areas of increased elevation, water systems can easily be designed to serve these areas with adequate water pressure for both fire and domestic purposes. Water systems improvements for this area may include privately operated pumps and tanks to serve the area with water.

27.34E Commentator feels that the DEIR analysis of water supply impacts does not support its conclusions.

Response: *See Standard Response Water Supply.*

27.35E Commentator feels that the DEIR's analysis of wastewater treatment, storage, and disposal should address the impacts of increased wastewater treatment.

Response: *See Standard Response Wastewater.*

27.36E Commentator agrees with DEIR's conclusion that the proposed trail system could cause impacts on sensitive biological resources, and suggests other potential impacts that may result from trail construction.

Response: The same policies related to the impacts of development projects would apply to the City's trail projects and serve as mitigation for General Plan purposes. As with other development envisioned by the General Plan, project level environmental review will evaluate the specific impacts of trail development on a particular location and mitigate accordingly.

27.37E Commentator feels that the DEIR's analysis of visual impacts is inadequate, particularly with respect to the southern gateways and hillside development in the RUL expansion area west of Foster Road

Response: *See Standard Response to Comment RUL and Response to Comments 26.1, 19.9 and 19.21.*

27.38G Commentator requests relocation of visual gateways depicted in Figure 1-3 of the Draft Policy Document.

Response: This policy recommendation can be presented to the City Council during hearings on the Draft General Plan.

27.39G Commentator suggests revision of Policy LU-1.5 to require that visual gateways integrate natural features.

Response: This policy recommendation can be presented to the City Council during hearings on the Draft General Plan.

27.40G Commentator feels that the DEIR's air quality analysis does not sufficiently address current air quality conditions, potential impacts, or mitigation policies.

Response: The DEIR and General Plan documents' air quality information and analysis is based on the most current information available at the time of preparation using the BAAQMD data. The significance criteria is based on the recently adopted *BAAQMD CEQA Guidelines for Assessing the Air Quality Impacts of Projects and Plan* (April 1996). Air quality changes anticipated by the limited development in the City projected by the General Plan were not found to be significant over the 25 year term using these criteria. All of the air quality policies have been consolidated in Appendix E of the Policy Document and it is believed that the cumulative long term effect of implementing these policies on a project level basis will mitigate any potential impacts that may result from the limited growth anticipated by the Plan.

27.41E Commentator does not feel that the DEIR's assessment of biological resources is sufficient. Specifically, the commentator does not believe the protections that the Draft Policy Document affords salt marshes are adequate mitigation against potential impacts.

Response: Page 7-6 of the Background Report and page 3.7-2 of the DEIR describe the locations of salt marsh in the Napa region and contain text explaining that most of the significant, true saltmarsh areas of the Napa River occur south of the horseshoe bend, outside of the City limits. A portion of the extensive Napa Marsh occurs along the Stanly Ranch and is designated PS by the draft General Plan. As noted in Response to Comments 27.15 and 27.16, further refinement of this designation would be subject to City Council consideration. Also see Standard Response to Comment Stanly Ranch for details on how Specific Plan and related EIR will further address protection of these jurisdictional wetlands. Areas of the Napa River subject to tidal influence (below Lincoln Avenue) also provide a brackish habitat. Resource protection policies related to riparian habitat and water quality address potential impacts. Impact analysis item 2 on page 3.7-8 of the DEIR discloses potential impacts and identifies policies that provide adequate mitigation on a general plan level based on the significance criteria outlined on page 3.7-7. It should be noted that salt marsh areas are also under the jurisdiction of the U.S. Army Corps of Engineers and that projects which may impact wetlands will not only be subject to the requirements of CEQA but are subject to further scrutiny through the Corps permit process.

27.42G Commentator suggests a new policy to reestablish, improve, and restore wildlife corridors.

Response: This policy recommendation can be presented to the City Council during hearings on the Draft General Plan.

27.43G Commentator suggest a new implementation program that calls for the City to establish a riparian setback ordinance establish 100-foot buffers.

Response: This policy recommendation can be presented to the City Council during hearings on the Draft General Plan.

27.44G Commentator suggest a new implementation program that calls for the City to develop a wildlife corridor overlay district.

Response: This policy recommendation can be presented to the City Council during hearings on the Draft General Plan. Also *see Response to Comment 19.9* regarding the need for a balanced approach to development/resource preservation within the RUL.

27.45G Commentator suggests a new policy for protection of existing wetlands and re-establishment or restoration of lost wetlands.

Response: This policy recommendation can be presented to the City Council during hearings on the Draft General Plan. The suggested policy describes the criteria used for evaluating wetland impacts in environmental documents and the limitations already imposed by the Army Corps of Engineers pursuant to their jurisdictional authority over wetlands.

27.46G Commentator suggests a new policy calling for new residential development to enhance, restore, and expand riparian and wetland areas.

Response: This policy recommendation can be presented to the City Council during hearings on the Draft General Plan. It appears that the policies under Goal LU-9 along with the Natural Resource Policies that address integrating protection measures into new development already address this issue.

27.47G Commentator suggests a new policy calling for new development on the fringe of the city to pay the full marginal cost of the development.

Response: This policy recommendation can be presented to the City Council during hearings on the Draft General Plan. It should be noted that the majority of new development costs have traditionally been borne by developers due the City's fee structure. The Council could consider adjustments to fee requirements during their regular review of City Fees.

27.48G Commentator suggests revision of Policy LU-6.4 to require riverfront development to consider natural resources and flood protection in its design.

Response: The Draft General Plan provides policies to support river enhancement in the downtown while addressing the urban relationship with restored nature. With regard to the integration of these policies with a future flood control project, *see Standard Response Flood Control and Responses to Comments 2.1, 2.2 and Response to Comment Letter #24.*

27.49G Commentator suggests revision of Policy LU-9.3 to require maintenance of wildlife corridors and prohibit fragmentation of large plant communities.

Response: *See Response to Comments 2.7 and 19.9.*

27.50G Commentator suggests revision of Policy LU-9.4 to protect environmentally sensitive areas by clustering nearby development proposals to avoid these areas.

Response: The suggested revisions preclude any opportunity to explore alternative mitigations that may be available based on detailed project level environmental review. Suggested changes to policy text will be subject to City Council consideration during General Plan public hearings.

27.51G Commentator suggests revision of Policy LU-9.5 to change "may" to "shall".

Response: *See Response to Comment 27.50.G.*

27.52E Commentator is concerned that many good policies in the Draft Policy Document do not have

specific implementation programs to ensure their effectiveness as mitigations.

Response: The City disagrees with the commentators assertion that only implementation measures can serve as mitigations measures. In fact, many policies are self implementing and do not require a companion mitigation measure.

27.53E Commentator suggests modifying Policy NR-1.3 to "require" planting of native species in natural habitats.

Response: *See Response to Comment 24.21.*

27.54E Commentator suggests revising Policy NR-1.4 to change 100 feet to ¼ mile from waterways for review of projects to ensure that they protect and minimize effects on the riparian and aquatic habitats.

Response: Given the extent and intensity of urban development that exists within the RUL, riparian and aquatic habitats associated with the waterway are unlikely to exist in the expanded area. The analysis of hydrologic and water quality impacts related to development that might occur as a result of the Plan is on page 3.9-2 through 3.9-4 of the DEIR. Policies referenced in this analysis serve as adequate mitigation at a General Plan level and address the concerns raised in this comment because they apply to all development.

27.55G Commentator suggests revising Policy NR-1.6 to remove "Whenever possible" and replace it with language suggesting a more definitive commitment.

Response: *See Response to Comment 24.14* regarding revisions to include more restrictive policy language.

27.56G Commentator suggests revising Policy NR-1.7 to remove "Endeavor to".

Response: *See Response to Comment 24.14* regarding revisions to include more restrictive policy language.

27.57E Commentator is concerned that the DEIR does not adequately address seismic hazards in the Stanly Ranch area.

Response: *See Standard Response Stanly Ranch* regarding environmental review at the Specific Plan stage the detailed evaluation of the distribution of land uses with the Specific Plan. The General Plan DEIR significance criteria for determining impact does not imply that the prohibition of development in these areas is the only available mitigation.

27.58E Commentator is concerned that areas with potential liquefaction hazards as designated for development, and that the DEIR does not recognize this potential problem.

Response: *See Response to Comment 27.57* regarding DEIR significance criteria. Page 3.8-2 of the DEIR outlines mitigations that, when implemented with new development, would reduce the potential impact to a less than significant level.

27.59E Commentator requests that the DEIR assess the potential impacts of permitting construction on slopes of 30 percent or more, as would take place in the RUL expansion area west of Foster Road.

Response: *See Response to Comment 27.58*; DEIR page reference is 3.8-3 regarding slope hazards. The characterization of the Foster Road area as having 30% or greater slopes is incorrect. The City Hillside development regulations (Zoning Ordinance) would apply as an implementation of General Plan Policies in all areas with severe slopes.

27.60G Commentator is concerned that Policy HS-3.9 would enable increased floodplain development if flood control solutions are not underway or funded by the year 2000. Commentator indicates that this would conflict with the stated objectives of the Draft Policy Document.

Response: Any development that would occur without the flood control project would be subject to the same restrictions that are in place today. The limited level of development within the floodplain, particularly residential, is evidence of the dis-incentive to development that these conditions/regulations provide.

27.61G Commentator suggest revising Policy HS-3.2 to require new development to demonstrate how it will affect downstream flows and flood potential.

Response: The floodplain management regulations contained in Napa Code Chapter 17.62 do this.

27.62G Commentator suggest revising Policy HS-3.6 to emphasize alternative flood control solutions that maintain the natural functions of the Napa River.

Response: *See Response to Comment 24.40.*

27.63G Commentator suggests a new policy (Policy HS-3.10) that would require that flood control channels be kept in functioning condition.

Response: *See Response to Comment 24.41*

27.64G Commentator suggests that the City investigate the possibility of combining restoration and flood control efforts.

Response: *See Standard Response Flood Control and Response to Comment 24.7*

28. Napa County Conservation, Development and Planning Department November 21, 1996

28.1G Commentator requests that the Draft Policy Document be amended to include policies ensuring that development in the area referenced in Addendum #1 is consistent with adjacent unincorporated area zoning.

Response: The 5 acre parcel of land at the north east corner of Trancas and Silverado Trail is within the City limits and currently subject to the City's regulations. Addendum #1 provides a land use designation for the property as required by State Law for all lands within the City's jurisdiction. The TC, Tourist Commercial designation allows for tourist related uses including visitor serving uses that emphasize the historic role of the Napa Valley in viticulture. By placing the RUL around the property, the RUL policies can be applied to ensure that the unincorporated land beyond the property is preserved for agricultural

uses. The suggested policy change will be subject to City Council consideration during the General Plan hearings.

28.2E Commentator requests that the DEIR be revised to address impacts associated with development in the area referenced in Addendum #1, with traffic being of particular concern.

Response: The City's General Plan traffic consultant has indicated that the potential development that could occur on the 5 acre parcel is not of a magnitude to cause any change in LOS conclusions for the purposes of General Plan analysis of the citywide circulation system. Localized improvements and other mitigations may be required as a result of project level CEQA review as would be the case with other future development projects that might be enabled by this General Plan.

28.3G Commentator reminds the City that certain lands south of the city and east of Highway 221 are designated as urban on the County's general plan, and requests that Addendum #2 reflect this fact.

Response: The Draft General Plan Addendum #2 is intended to carry forward the current City designated Greenbelt lands outside the RUL. Exhibit C in Addendum #2 is intended to apply Greenbelt designation to County parcels reserved for agriculture and open space purposes and it is the City's intent to support the County policies in preserving the integrity of these areas. Detailed information would be appreciated so that the Greenbelt designations in Addendum #2 can be adjusted to correctly reflect County policy.

28.4G Commentator urges the City to add a provision to its Housing Element that calls for the City to enter into a joint program to share housing credits per AB 3456.

Response: *See Response to Comments 12.6 and 13.9.*

29. Napa County Local Agency Formation Commission
November 26, 1996

29.1E Commentator requests that the DEIR be updated to assess to the potential environmental effects of development of the area described in Addendum #1.

Response: The circumstances related to the parcel on the north east corner of Trancas and Silverado Trail that is the subject of Addendum #1 are similar to those that apply to the Stanly Ranch (*See Standard Response Stanly Ranch*). The land has been a part of the City for may years and (unlike the Stanly Ranch) is within the City's Sphere of influence. Modification of the RUL line to include the property does not change its current potential for urban development since it is already within the City's jurisdiction. Therefore, the adjustment is not growth inducing or inconsistent with any LAFCO policies. RUL policies applied to the property will establish a clear statement that the land adjacent to and surrounding the parcel are not appropriate for urban development (currently the RUL policies cannot be applied to this property). The City Draft General Plan Addendum #2 strengthens this policy by designating these areas as greenbelt.

30. Susan Rushing-Hart
December 2, 1996

30.1E Commentator does not feel it would be appropriate for the Planning Commission to pass the General Plan because "it is inundated with inadequacies, pertinent information is not readily accessible, or it has not been sufficiently proofread."

Response: The comment contains generalized assertions regarding the inadequacies of the DEIR. *See Standard Response CEQA applications to General Plans and other Standard Responses as well as Response to Comments 1.1, 27.1, 18.2 and the responses to Communication #19* (also written by the commentator). This entire response document attempts to identify and address questions on the DEIR and General Plan documents.

30.2E Commentator would like the Draft General Plan to be open for public review for a longer period of time.

Response: *See Introduction - EIR Process and Standard Response CEQA Application to General Plans as well as Response to Comment 18.1.* It should be noted that the Draft General Plan is available for review and comment up until the day of final adoption by the City Council. Hearings on the General Plan have not yet commenced and will begin after the 45 day recirculation and public review of the Revised DEIR and this Response to Comment document.

30.3E Commentator would like to know where the general public can access the City's *Futures Report.*

Response: The Futures Report is available for public review at the City Planning Department, 1600 First Street, Napa, Ca. and at the reference desk at the City/County Library.

30.4E Commentator questions the rationale for rejecting Reduced Growth Alternative 1.

Response: The DEIR page 5-11 provides the analysis of Reduced Growth Alternative 1 and demonstrates that it does not meet objectives 2, 5 and 6 of the General Plan as listed on page 5-1 of the DEIR. The Alternative has not technically been "rejected" until the City Council considers the DEIR, certifies the adequacy of the document and actually adopts a General Plan.

30.5E Commentator questions how DEIR Reduced Growth Alternative 2 would create greater impacts in certain areas.

Response: The first two paragraphs of DEIR Chapter 5 explains that CEQA requires that alternatives that can feasibly attain the basic objectives of the project be considered . The most viable alternatives are those that share the same fundamental objectives that have guided the formulation of policies articulated by the Draft Policy Document. The DEIR analysis of Alternative 2, the Reduced Growth Alternative, acknowledges that most environmental impacts will be equal to those of the Draft Plan but questions whether the City will be able to effectively satisfy objectives 2, 5 and 6 as listed on page 5-1 of the DEIR. The most significant question is whether the across-the-board reduction in residential densities would enable the City to promote affordable housing in the future as limited land supply continues to increase the cost of housing in the RUL. By doing so, this alternative would frustrate efforts to satisfy the City's regional fair share housing requirements thereby jeopardizing the availability of critical funding needed to support affordable units as housing prices increase. Such policy trade-offs are subject to Council consideration as they review the DEIR and consider the Alternatives during the public hearing process.

30.6E Commentator requests clarification of statements concerning housing and historic buildings.

Response: The meaning of the referenced text is that the Draft General Plan reduces densities in historic neighborhoods in order to preserve neighborhood character and eliminate pressures to demolish historic buildings and replace them with higher density housing projects.

31. Louise Clerici
December 2, 1996

31.1G Commentator suggests revised language concerning the 1975 General Plan.

Response: *See Response to Comment 11.2.*

31.2G Commentator points out typographical error.

Response: The General Plan text will be revised as suggested.

31.3G Commentator points out the absence of a definition for "quantified objectives".

Response: The General Plan text will be revised as suggested.

31.4G Commentator suggests different zoning ordinance revisions be done in same time frame.

Response: The time frames shown in the Draft General Plan will be subject to consideration by the City Council prior to adoption. Later time frames are proposed for Zoning Ordinance modifications that will require special study, staffing and funding and which are not essential priorities for Land Use consistency purposes.

31.5G Commentator suggest the term platting be included in the Appendix A Glossary.

Response: The General Plan text will be revised as suggested.

31.6G Commentator asks where the standards are for protecting neighborhood character.

Response: These standards are set out primarily in the Zoning Ordinance.

31.7G Commentator notes typographical error.

Response: The General Plan text will be revised as suggested.

31.8G Commentator questions definition of single family attached unites.

Response: The definition of "single family attached dwelling" will be revised.

31.9G Commentator points out an apparently erroneous reference to 1995 in the Housing Element.

Response: Updating of the Housing Element is not statutorily mandated until 1999. Since the Housing Element will not be amended as part of the 1996-97 General Plan update, the 1995 date will not be changed.

31.10G Commentator wants definition of "catchment" area.

Response: References to "catchment" will be eliminated.

31.11G Commentator requests map of liquefaction potential.

Response: The Draft General Plan Background Report contains such a map as identified in Figure HS3.

31.12G Commentator requests clarification of dam failure inundation as described on page 8-14 of Policy Document.

Water Division Response: The statements in the Draft General Plan are taken from data included in the Draft General Plan Background Report, page 8-28. The estimated inundation levels at Trancas Street for dam failures at Hennessey Reservoir and Milliken Reservoir are correct. The depth of flooding is dependent on the amount of water released, the channel cross-section and the length of time it takes the water to get to the point of interest. In the case of Conn Dam failing, the water released has a long distance to travel and very wide area over which it can spread as it flows down the Valley towards the City of Napa. Even though Milliken Reservoir is much smaller, the travel distance to Trancas Street is much shorter and therefore, there is much less time for the water to spread out as it makes its way down into town. Also note that Trancas Street crosses Milliken Creek before the creek discharges into Napa River. As shown in Table HS-5 of the Background Report, the inundation levels drop rapidly once Milliken Creek discharges into the Napa River, as the Napa River has a much greater carrying capacity.

31.13G Commentator asks for definition of "low mobility".

Response: The term "low mobility" summarizes the types of uses normally not acceptable in Zone D based on the Airport Land Use Compatibility Plan Criteria. A definition will be added to the glossary as follows: *" **Low Mobility Use** A use involving a concentration of people that would require assistance, supervision or special transportation means to move efficiently from a site or building, such as schools, hospitals or nursing homes."*

31.14G Commentator points out typographical error.

Response: The General Plan text will be revised as suggested.

31.15G Commentator questions criteria for evaluating parcels for likelihood of development.

Response: Page C-2 of the Policy Document (excerpted from the Concept Report) discusses the capacity assessment criteria used for evaluating potential infill development. It should be noted that appendix C was included to provide background information and that it refers to other information that is included in the Concept report, but which has not been excerpted for Appendix C. If the City Council feels that additional clarification of background data is needed it could be included in Appendix C by way of a footnote that refers the reader to the Concept Report for further information.

31.16G Commentator requests definition of "median".

Response: The General Plan text will be revised as suggested: "Median- the mid-point in a range of numbers".

31.17G Commentator requests definition of "Map Reference Area (MRA)".

Response: The referenced text of Appendix C is extracted from the Concept Report description of the capacity analysis process used for the Draft General Plan. MRAs appear to have been developed as an analytical tool during the CAC concept development process to accomplish subarea analyses that would relate to both neighborhood identity and infrastructure planning; eventually leading to the Pod assignments found in the Policy Document.

31.18G Commentator points out absence of map referenced in text.

Response: Map will be included as suggested.

31.19G Commentator points out typographical error.

Response: The General Plan text will be revised as suggested.

31.20G Commentator points out typographical error.

Response: The General Plan text will be revised as suggested.

32. Charles W. Shinnamon
December 1 1996

32.1E Commentator objects to the widening of Soscol from Imola to Lincoln to six lanes as an assumption or mitigation measure in the EIR.

Response: The question of need for additional traffic capacity in the Soscol Avenue corridor was addressed during the preparation of the Draft General Plan by looking at several alternatives, including the development of a new roadway between and parallel to Soscol Avenue and Silverado Trail. That alternative would have made use of Burnell Street and McKinistry Street. This alternative was rejected as being less practical than a potential future widening of Soscol Avenue. The projections from the traffic forecasting model indicate that, at their current widths, both Soscol Avenue and Silverado Trail would operate in excess of the City's Service Level policy at the buildout of the General Plan. However, it was also the Consultant's judgment that while the model might indicate such a condition, the condition was of a type that might or might not happen - the degree to which the service level policy would be exceeded was not so great as to warrant a major improvement program. The suggestion instead of a major widening program, and the policy included in the Draft General Plan, is that this location be monitored for traffic problems, and that the City establish a policy of protecting right-of-way in the corridor as future development occurs so that, if a widening project were necessary, then it can be accomplished with the least disruption and/or cost possible at the time.

32.2E Commentator suggests the traffic model be run without assuming the Linda Vista Avenue bridge and the Solano Avenue bridge.

Response: The projects listed above were included not to respond to specific capacity concerns but rather to improve overall circulation within the respective portions of the community. The system could function adequately without them, but they are judged to have value for providing better connectivity within the city.

32.3E Commentator is confused by the letter from the CMA (Appendix C) and would like clarification.

Response: The Napa County Congestion Management Agency is charged by State statute with insuring that the standards of the Napa County Congestion Management Program are maintained. New development projects have the potential to create conditions that would cause these standards to be exceeded. The CMA has developed a set of criteria for determining if a proposed development project might create those kind of conditions. One criterion is that if, in any of the zones of the traffic model, an increase of 500 or more trips would occur as the result of new development, then the project is deemed to be of such significant size that a conformity analysis is required. The conformity analysis includes producing a forecast for the year 2000 and determining if the CMP Service Level Standards are exceeded. The initial test run for the Napa General Plan indicated that in no zone would the growth to the year 2000 exceed 500 trips in any one zone. Thus, no further analysis was required to satisfy CMA requirements.

32.4E Commentator feels it is imperative that the EIR discuss how traffic generated by the Airport Specific Plan will impact the city of Napa.

Response: The issue raised by the commentator is the proper province of the Airport Area Specific Plan EIR. Information on that subject will be found in that DEIR.

32.5E Commentator questions whether the General Plan overstates the amount of developable land for commercial and industrial development within the RUL and, if true, how this might affect the achievement of the City's jobs/housing goals.

Response: The development potential projected by the Draft General Plan was based on a parcel specific analysis conducted by Planning Staff. Details of this analysis are presented in the "Employment Capacity Analysis Methodology" described on page Ixxii of the General Plan Concept Report (Appendix IV). Since these are the best and most recent data available, they were used for forecasting jobs/ housing figures.

32.6E Commentator questions the projection of 1,277 new homes in the Linda Vista Planning Area and the effects on the jobs/housing balance.

Response: The Linda Vista development potential is derived from the density ranges designated by the Linda Vista Specific Plan. Due to the time frame for preparation of this General Plan, it may now represent dwelling units that have been constructed since the data were established for the General Plan in 1992. Regardless, the potential dwelling units for the Linda Vista area was considered in the calculations of jobs / housing balance.

33. Mark Brewer
December 2, 1996

33.1G Commentator opposes Souza Lane extension.

Response: *See Response to Comment 22.1.*

33.2G Commentator opposes any down zoning of his property, particularity in view of the stated goals (H-1 and H-13) of maintaining sufficient housing opportunities in Napa.

Response: The current land use designation for the western portion of the commentator's property is high density residential. The Draft General Plan proposes to change this designation to SFI with a density range from 4 to 8 dwelling units per acre. Changes in land use designations and densities are a fundamental consideration in a General Plan update and will be subject to review by the City Council. The commentator's concern for his property should be addressed to the City Council during hearings on the Draft General Plan.

34. Muriel Fagiani
December 2, 1996

34.1E Commentator asks for clarification regarding the status of the Redevelopment Plan and the reason it is not incorporated into the General Plan.

Response: The redevelopment plan, as required under State redevelopment law, is intended as a general statement of goals and policies to guide redevelopment. The "Urban Redevelopment Plan/Parkway Plaza Redevelopment Project", the City of Napa's redevelopment plan, was originally adopted in 1969. At the time of its adoption the redevelopment plan was consistent with the City's General Plan. The General Plan and Zoning Ordinance have been amended and updated many times since then. However, there is no requirement in redevelopment law or any other provision of State law, that requires subsequent amendment of the redevelopment plan whenever a city's general plan or zoning ordinance change. In fact, the text of the City's redevelopment plan expresses an intention to comply with the City's General Plan and Zoning Ordinance on an on-going basis. The text sets forth this intention in Part I, Article V, Section B, Predominant Land Use Provision, of the plan on pages 11-12.

35. Ray Valeri
November 29, 1996.

35.1E Commentator feels the DEIR does not adequately address the impacts of Stanly Ranch development. Commentator feels a small resort development would be appropriate but that 600 homes is too much development for Stanly Ranch.

Response: *See Standard Response Stanly Ranch.*

36. Judy Irvin
December 2, 1996

36.1G Commentator feels the Draft General Plan does not adequately consider the higher number of illegal, substandard flood-prone units in Planning Area 8 (Central Napa).

Response: See Implementation Program HR-1.J on page 6-5 of the Policy Document. This policy augments the current City regulations for addressing non-conforming uses and structures and would

enable more aggressive action by the City if deemed an appropriate commitment for funding and staffing by the City Council.

36.2G Commentator feels policies to "retain neighborhood character" are designed to keep low income housing in historic neighbors and out of affluent suburbs.

Response: Policy comment noted; no response necessary.

36.3G Commentator recommends policies to encourage density transfers.

Response: The commentator's concern is based on the higher density projects that were developed in historic neighborhoods as a result of land use designations of the 1982 General Plan. The Draft General Plan reduces densities in these neighborhoods in keeping with the pattern of land use that exists and effectively transfers densities throughout the RUL from what was assigned in the 1982 Plan in order to provide for future residential growth in a way that recognizes existing neighborhood character.

36.4G Commentator recommends policies to encourage dispersal of affordable housing throughout the city and a preponderance of owner-occupied housing in all planning areas.

Response: *See Response to Comment 12.6* regarding the status of the Housing Element. Policy comment noted; no response necessary.

36.5G Commentator recommends increasing the allowable FAR in downtown from 2.00 to 3.00 or 3.50.

Response: Increased FAR assignments would be subject to City Council consideration during the General Plan hearings. It should be noted that an increase in FAR's for the downtown area could encourage new development on underutilized properties (many with historic buildings) and that this could severely affect the character and scale of the downtown. For example, if future economic conditions result in a demand for additional floor area in the downtown, older 2-story buildings would be less desirable from an economic standpoint, than new 3-story buildings.

36.6G Commentator feels traffic has negative impacts on historic resources.

Response: The basis of the commentator's claim is unclear. Comment noted; no response necessary.

36.7G Commentator requests that Table 3-2 in Policy Document (Street and Highway Classification System) include a category for Historic Roadways.

Response: The grid streets in Planning Area 8 meet the standards for local residential streets. Arterials and collector streets are identified on Figure 3-1. It is unclear how the suggested "historic roadway" classification would function differently from a transportation standpoint.

36.8G Commentator suggests Lincoln Avenue be designated the gateway to downtown and that through traffic should be discouraged within historic downtown neighborhoods.

Response: The commentator suggests significant alterations to the historic flow of traffic to and from the downtown area that would require major modifications to the city's circulation plan and exhaustive evaluation and analysis. Such changes would alter traffic distribution and travel patterns citywide and would have repercussions on land use and other aspects of the General Plan. Since this was not a component of the land use scenario of the Concept Report confirmed by the City Council, it has not been considered in the preparation of the Draft General Plan and traffic modeling.

36.9G Commentator feels the Draft General Plan does not adequately address the shortage of parks and open space in Planning Area 8 (Central Napa).

Response: Commentator's claim of internal inconsistency of the Parks and Recreation Element is not supported by adequate information to allow for a comprehensive response. Future park needs are described on page 5-2 of the Policy Document and indicate that additional community park facilities are needed in Quadrant 2, Central Napa; recognizing, however, the historic character and other constraints may prevent the existing park (Fuller) from being developed to provide may of the functions of a community park. This paragraph offers further discussion of opportunities to address deficient neighborhood park access through purchase or lease of surplus school sites or establishment of a joint use agreement on school property to help meet neighborhood park needs in underserved neighborhoods.

36.10G Commentator feels Draft General Plan does not adequately address open space that may be made available by the flood control project.

Response: *See Standard Response Flood Control.*

36.11G Commentator says DEIR incorrectly equates Onasatis and the Coast Miwok.

Notes: Revise text on page 3.5.1 of DEIR and page 6-1 of Background Report as noted.

Response: Comment acknowledged. The most ancient people to have occupied the Napa area were the Onasatis. They were a separate language group, different from the Miwok. Page 3.5-1 of the Draft EIR equates the original inhabitants (Onasatis) with the Miwok; probably because the Historic Preservation chapter of the General Plan Background Report calls the Penutian language group (who settled where the River meets Napa Creek) "the Original Napans, most likely related to the Coast Miwok." (Page 6-1 of General Plan Background Report.) The text of the background report will be revised to eliminate the sentence *"The original Napans were most likely related to the Coast Miwok"*. The Cultural Resources section of the DEIR (page 3.5.1) will be revised as follows: "*The first Napans called themselves "Onasatis", the Outspoken People. These original Napans ~~were most likely related to the Coast Miwok and~~ lived in the vicinity of modern Napa until the early 1800s."*

37. John Clifton
December 2, 1996

37.1G Commentator suggests page 17 of the Draft Policy Document be reworded to reflect the serious aspects of making changes to the neighborhood character and typology concept.

Response: Comment noted. The recommended changes in the draft policy language can be presented to the City Council during hearings on the Draft General Plan and DEIR.

37.2G Commentator feels specific plans should be prepared for Planning Areas 8 (Central Napa) and 9 (Soscol).

Response: *See Response to Comment 24.6.*

37.3G Commentator supports upgrading of "seismically impaired" buildings to allow for residential uses on the second and third floors and suggests downtown be designated Downtown Commercial Residential.

Response: Policies under Goal HS- on page 8-2 are intended to address seismic safety considerations for buildings. In addition, Policy HR-1.13 and Implementation Program HR-1.N and HR-1.O in the Historic Resources Element support seismic rehabilitation of older buildings. Policy LU-6.3 and LU-6.7 and Implementation Programs LU-6.B and LU-6.E in the Land Use Element also support rehabilitation of older structures and the integration of residential uses into the downtown. Finally, the Draft General Plan establishes a DC-Downtown Commercial land use designation which applies to the city's historic commercial area and provides for retail administrative, institutional, recreational and other uses and specifically states that higher density residential uses and mixed residential and commercial uses are desirable at residential densities ranging from 10 to 40 units per net acre. The intent of these policies is to foster use/re-use of older buildings as described in the comment.

37.4G Commentator suggests the Center for Wine, Food and Arts be designated as a separate planning area.

Response: A Planned Development Permit was approved for the Center project on January 21, 1997. An EIR was certified as being adequate to address the project impacts related to Center development. The project is consistent with the land use and zoning which existed when approved and will be consistent with the proposed designations of the Draft General Plan. It does not appear to warrant any special planning area consideration.

37.5G Commentator suggests the floodway be designated as a separate planning area.

Response: *See Standard Response Flood Control.* The City already employs a Floodplain Zoning Overlay to address development in the floodplain. The Draft General Plan maintains the adopted Flood Evacuation Area which restricts development in flood prone areas for safety reasons; and will continue these regulations until safety considerations are adequately addressed through flood control or by other means. See text and policies under Goal HS-3 regarding flood risk on pages 8-9 through 8-13 of the Draft Policy Document

37.6G Commentator opposes development of "flag lots" unless there are absolutely no other alternatives.

Response: The City currently has adopted zoning standards for flag lot development. Such development is many times the only alternative available for infill on existing, underdeveloped, long narrow parcels. Flag lot development allows the addition of dwelling units without significantly compromising the neighborhood character in terms of the street appearance of the lot and the preservation of the existing home.

37.7G Commentator says resort plans, such as Stanly Ranch, should require a supply of housing to meet the needs of permanent employees.

Response: *See Standard Response Stanly Ranch.* Employee housing is included in the recently submitted specific plan application. Policies in the Housing Element are intended to address housing needs for all levels of income, including families with income generated from resort development.

37.8G Commentator feels all residents in the designated neighborhoods, not just those within a short distance of the project, should be sent individual public notices of all infill projects.

Response: The City already has adopted a policy to exceed minimum required mailed notice requirements based on certain thresholds of project development. Any special notice consideration for infill development (which is not included in the current city policy) will be subject to City Council consideration.

37.9G Commentator feels that Chapter 3, Transportation, should include a plan for future housing development.

Response: Staff believes that Chapter 1 (Land Use) and Chapter 2 (Housing) fully and adequately address future housing at the General Plan program level and that no additional discussion of housing is needed in Chapter 3.

37.10G Commentator feels City and school bus programs should be more integrated and that the bus system should be less dependent on subsidies.

Response: Policy comment noted; no response necessary.

37.11G Commentator feels the rail transportation between Napa and Vallejo could reduce the traffic load on Highway 29.

Response: Policy comment noted; no response necessary.

37.12G Commentator requests that General Plan demonstrate the changed relationship of Soscol Avenue and the River as represented by the "flood plan" and include a recommendation that Hwy 121 be changed from Silverado Trail to Soscol Avenue.

Response: The comment is part editorial and part a recommendation The editorial seems to be a comment on the mapping of Soscol and the River and is the commentator's offer of a future circulation opportunity that could coordinate with a flood control design. The potential for 121 to be relocated from Silverado Trail to Soscol Avenue is a Caltrans consideration. With respect to any special circulation options that may result from an adopted flood control project, *see Standard Response Flood Control.*

37.13G Commentator feels the Policy Document should consolidate all environmental issues in one section.

Response: The purpose of the DEIR is to identify, consolidate and analyze environmental issues. See the Response to Comment 46.1 regarding the use of separate volumes for General Plan and EIR documents.

37.14G Commentator suggests the General Plan include and incorporate the Clean Cities program, in which the City already participates.

Response: The City currently participates with other public agencies and private organizations to implement programs to improve air quality. Many of the Clean City programs are supported by the air quality policies that are consolodated in Appendix E of the Policy Document.

37.15G Commentator recommends an Economic Section in the General Plan to establish an ongoing evaluation of each new development and change in the demographics of both the City and County.

Response: *See response to comment 1.1G.*

37.16G Commentator suggests editorial changes.

Response: The General Plan text will be revised as suggested.

38. State of California Office of Planning and Research
November 18, 1996

38.1E OPR informs City that no state agency comments were received through the formal clearinghouse process.

Response: No response necessary.

39. Napa County LAFCO
December 18, 1996

39.1. Commentator informs city that LAFCO will defer review of the Draft General Plan and DEIR until the City of Napa Planning Commission has reviewed and made recommendations on the documents.

Response: No response necessary.

40. Napa Valley Wine Train
January 6, 1997

40.1G Commentator outlines concerns and suggestions concerning a riverwalk along the Napa River in Downtown.

Response: Policy/design comments related to flood control project noted. For relationship of the flood control design process to the Draft General Plan process *see Standard Response Flood Control.*

40.2G Commentator urges City Council to reconsider its decision on First Street.

Response: Land use policies under the Downtown section of the Draft Policy Document (starting on Page 1.17) will enable the City Council to consider circulation options in the future that would enhance the viability of the Downtown commercial area. See Policies LU-6.1, LU-6.6 and LU-6.11.

40.3G Commentator suggests moving Soscol to McKinstry/Burnell Streets if Caltrans will pay for bridge and right of way.

Response: It is not clear from the comment what the land use or environmental basis for this recommendation is. Relocation of the State Highway is a Caltrans consideration. The recommended

relocation would offer no citywide circulation benefits based on the traffic analysis prepared for the Draft General Plan.

41. Napa County Farm Bureau
January 6, 1997

41.1G Commentator opposes expansion of the RUL.

Response: *See Standard Response RUL.* This policy concern can be presented to the City Council during hearings on the Draft General Plan.

41.2E Commentator feels the DEIR does not adequately assess the impacts of developing Stanly Ranch.

Response: *See Standard Response Stanly Ranch.*

41.3E Commentator feels the Draft General Plan proposal to include an agricultural parcel east of Big Ranch Road in the RUL is a dramatic departure from current City policies.

Response: *See Standard Response RUL.*

41.4E Commentator feels the DEIR does not adequately assess the growth inducing impacts of development of Stanly Ranch and the area east of Big Ranch Road.

Response: *See Standard Response Stanly Ranch and Big Ranch.*

41.5E Commentator feels the DEIR does not address the adequacy of water supplies to support new development between now and 2012.

Response: *See Standard Response Water Supply.*

41.6E Commentator points out that the DEIR does not adequately address commercial development of the 5 acre parcel at the northeast corner of Trancas and Silverado Trail.

Response: *See Response to Comments 28.1 and 28.2.*

42. Louise Clerici
February 6, 1997

42.1G Commentator suggests General Plan include local examples of residential projects built at various densities.

Response: This is a helpful suggestion for supplementary information to assist readers in the understanding of residential densities proposed by the Draft General Plan. The information will be prepared for review during hearings if time and staffing permits.

Comments Received at October 17th and 24th, 1997 Planning Commission Public Hearings on the General Plan Draft EIR

A. Muriel Fagiani
October 17, 1996

A.1E Commentator feels it is a mistake not to include in the EIR maps of the 1940 and 1986 floods to show the extent of flooding.

Response: The Draft General Plan Background Report contains several pages of discussion concerning flooding potential and the history of flooding in Napa (pages 8-19 to 8-26). This section of the background report includes a map of the 100 year Floodplain and Floodway (Figure HS-9) and a map of the Flood Evacuation Area (Figure HS-10). These maps reflect historical experience with the 1940 and 1986 floods.

A.2E Commentator expresses concern that Policy Resolution 27, which includes Standard Conditions of Approval, can be changed.

Response: Policy Resolution 27 contains standard mitigation measures that are designed to address typical impacts that would be expected to result from development. The incorporation of standard mitigation measures into project level environmental review is an efficient way to ensure that the City is addressing typical impacts for all projects in an equal and effective fashion. Policy Resolution 27 does not preclude the CEQA process for project level environmental review, but only makes it more efficient. Regardless of the future status of Policy Resolution 27 and its mitigation measures, projects would still be subject to CEQA review and impacts would need specified mitigations in the absence of standard mitigations. The DEIR recognizes that the City has an adopted set of standard mitigations along with a standardized monitoring program, to address typical impacts associated with future development that might be enabled by the General Plan.

B. Chris Malan
October 24, 1996

B.1E Commentator feels the DEIR does not adequately address the impacts of developing Stanly Ranch.

Response: *See Standard Response Stanly Ranch.*

B.2E Commentator feels Draft General Plan does not adequately address mass transit, therefore, provides no mitigation for traffic.

Response: Staff respectfully disagrees. Policies T-5.1 through T-5.16 and Programs T.5A and T.5B should collectively be useful in promoting mass transit use and in reducing traffic congestion.

B.3E Commentator notes there is no mitigation measure for replacement of the Imola Bridge for future roadway improvement No. 17 on page 3.3-7 in the DEIR.

Response: *See Response to Comment 16.2.*

B.4E Commentator says there is no mention in the DEIR of endangered species such as hard head minnow, the stickleback, and the bluegill that inhabit the river.

Response: *See Response to Comment 11.8.*

B.5G Commentator feels Draft Policy Document is "lacking" in implementation of wildlife corridors and riparian corridors along the Napa River.

Response: *See Response to Comments 19.9 and 24.26.* These policy concerns can be presented to the City Council during hearings on the Draft General Plan.

C. Richard Nieman
October 24, 1996

C.1E Commentator feels the DEIR does not adequately address the impacts of development of Stanly Ranch.

Response: *See Standard Response Stanly Ranch.*

D. Muriel Fagiani
October 24, 1996

D.1.G Commentator asks why Draft General Plan is published in three separate volumes.

Response: Each volume serves a different purpose and plays a different role. The Draft Policy Document is the primary document since it sets out the City's official policy for land use, development, and environmental protection. The Draft Background Report is purely a description of existing conditions and trends in Napa. These two documents will be formally adopted as the General Plan at the end of the update process. The Draft EIR is <u>not</u> a part of the General Plan.

D.2.G Commentator asks why there is no discussion of the Redevelopment Agency in the DEIR.

Response: *See response to Comment 34.1.*

E. Dorothy Glaros
October 24, 1996

E.1. The Commentator makes several observations and suggestions regarding the Draft General Plan and DEIR review process. And believes that certain policies in the housing element are contrary to CAC discussions on the subject of affordable housing.

Response: *See Response to Comment 12.6* regarding the status of the Housing Element in the Draft General Plan. The other comments are suggestions for the public review process. No response is necessary.

F. Planning Commissioner Mulford
October 24, 1996

F.1E. Commentator finds it confusing that the City of Napa is described statistically in so many ways.

Response: It is essential that the Draft General Plan be fully described in terms of its many aspects/dimensions. Impact analysis, for instance, cannot be conducted without such information.

F.2E. Commentator feels the DEIR does not adequately address the impacts of existing development.

Response: This is not so much a CEQA issue for the DEIR as it is a policy issue for the General Plan. CEQA requires analysis of proposed changes that may negatively affect the physical environment, not existing incompatibilities that are the result of past decisions.

F.3E. Commentator feels the reasons why Reduced Growth Alternative 2 is not the preferred alternative are weak and elaborates.

Response: *See Response to Comment 30.5.*

G. Planning Commissioner Hover
October 24, 1996 (Oral Comments at Hearing)

G.1. Commentator would like the DEIR to name the exact species that inhabit all sites within the city as opposed to a more general reference.

Response: *See Standard Response CEQA Application to General Plan EIR* . It is beyond the scope of a general plan or a general plan EIR to list all wildlife species on a parcel by parcel basis. Parcel specific information can be prepared at the point there is a more specific proposal that would affect the parcel.

End of Responses

APPENDIX E

APPENDICES

COMMENT LETTERS AND HEARING MINUTES

N A P A

CHAMBER of COMMERCE

Napa Chamber of Commerce

October 15, 1996

Chair, James Mulford and
Planning Commission Members
City Hall
Napa, California

RE: Napa City General Plan

Dear Chair Mulford,

The Napa Chamber has been following the development of the General Plan for the City of Napa for a number of years, and, now that it is up for final approval, we would like to make comment.

Three years ago we assisted the City by conducting well-attended and professionally facilitated meetings with local business owners and community leaders. We feel that valuable groundwork was developed towards the creation of an Economic Element for the General Plan; which is something that is believed by many (including the Planning Department) to be a crucial aspect of a solid General Plan. Discussed in those meetings were major land use issues that are of great economic consequence and benefit to the community such as the Flood Control Project and the Airport Specific Plan. These issues are key examples of what the General Plan should address in order to provide a sound business plan for the future of the City of Napa.

We feel that the General Plan is a good plan and applaud John Yost and his staff for their efforts: but, we also feel that it is incomplete without an Economic Element. Therefore, we believe and request that prior to the approval of the General Plan, a resolution must be adopted, and allowance in the budget be made, for the development of an Economic Element. As we have in the past, the Napa Chamber wishes to participate and offer any assistance we can in order that the Economic Element become a part of the General Plan of the City of Napa.

1.1

1556 First Street • P.O. Box 636 • Napa, CA 94559 • 707-226-7455 • Fax 707 226-1171

General Plan, page 2

Please let us know what your decision is so that we can plan to participate.

Sincerely,

Charles B. Bogue

Charles B. Bogue
President

cc - John Yost, Planning Director
Mayor and City Council Members of Napa

COMMUNICATION #2
RECEIVED DURING THI 0/17/96 DEIR PUBLIC HEARING.

APPENDIX E

Friends of the Napa River

2.

The Landmarks Building
1026 First Street • Napa, CA 94559
Phone (707) 255-8646 • Fax (707) 255-2164

October 17th, 1996
City of Napa Planning Commission
Hearing on the DIR of the General Plan

Moira Johnston-Block President of Friends of the Napa River responded to the DEIR for the Napa Urban Waterfront Restoration Plan in January of 1992. In her response she asked for "consistency and integrity of design" along the Urban Water front. The response she received was there were no policies and guidelines in the Napa General Plan to evaluate the proposed project. I am submitting to you a copy of her letter and the response. When the American Center for the Food, Wine and the Arts were evaluating the traffic concerns they stated they found no guidance in the General Plan. We find the same lack of detail in this General Plan. Therefore tonight we are submitting guidelines for use along the Urban River Front to be incorporated into the General Plan. We also are submitting the policy statements and implementations taken out of the Plan that directly reference the Napa River Watershed. We would like these placed in an appendix like the one on Air Quality, Parks and Recreation etc:. 2.1 2.2

It is confusing to be here tonight discussing the Environmental Impact report when we have many additions to the policies, implementations, glossary and comments on the policies themselves. We have worked hard in ten days to come up with response that would make our input meaningful. It seems to have the very best EIR and General Plan you must get the response to the Plan First.

The Parks and Recreation element is very clear and precise about the numbers of people a park will serve in a radius where the trails will be etc: The transportation section seems very detailed but when there is a discussion of stormwater management in the community services section there is a lack of detail likewise in the Natural Resource section.

In the section on stormwater drainage (4-13) creeks are described as <u>natural drainage channels</u> an intregal part of the stormwater drainage system along with pipes and culverts. We must stop overloading our creeks with stormwater runoff <u>over and above</u> the runoff that would have occurred on vacant land with trees and grass. Not only are we increasing the volume we have increased the speed. This has a detrimental effect on a natural living waterway. 2.3

We also need to make a commitment to not covering our creeks or forcing them underground. All development of 4 or more homes must maintain runoff at predevelopment rates. The DEIR states there will be little additional runoff in the future

(3.9-3) because the majority of the land is already urbanized. However we have seen with relatively little development the back up in the stormdrains. We should not wait for state and federal regulations to kick in when our population hits 100,000 let's admit we are being impacted now and put our own regulations in effect. What are the regulations on development in the floodplain on 8-9 if they are there why haven/t they been used? Do we need to make them more clear? 2.3

In the DEIR 3.78 #3 I find the admission that Land Use Policy 9.3 implies that development may occur on sites with sensitive resources. and then there is a description of the other land use policies that would allow for protection of the sites. However when you just read the policy and not the description of the policy you don't have any idea that the city could use it to protect sensitive areas. So we think maybe we should say exactly what the policy means. The policies read in that section "the city may or the city will encourage". It seems there are a lot of these <u>its available if we choose to</u> <u>use it policies that could be read either way.</u> 2.4

The narrative sections between the policies show a tremendous understanding of the natural resources, flooding issues etc: but when it comes to the policies after the narrative they are flimsy and vague. 2.5

Changing the zoning of the Stanley Ranch is a big change there must be some significant impacts which we do not see described. Like the number of trips to the store from the Stanly Ranch just to name one. If an area like that can be rezoned with a general plan can we change the zoning in the floodway to be openspace? 2.6

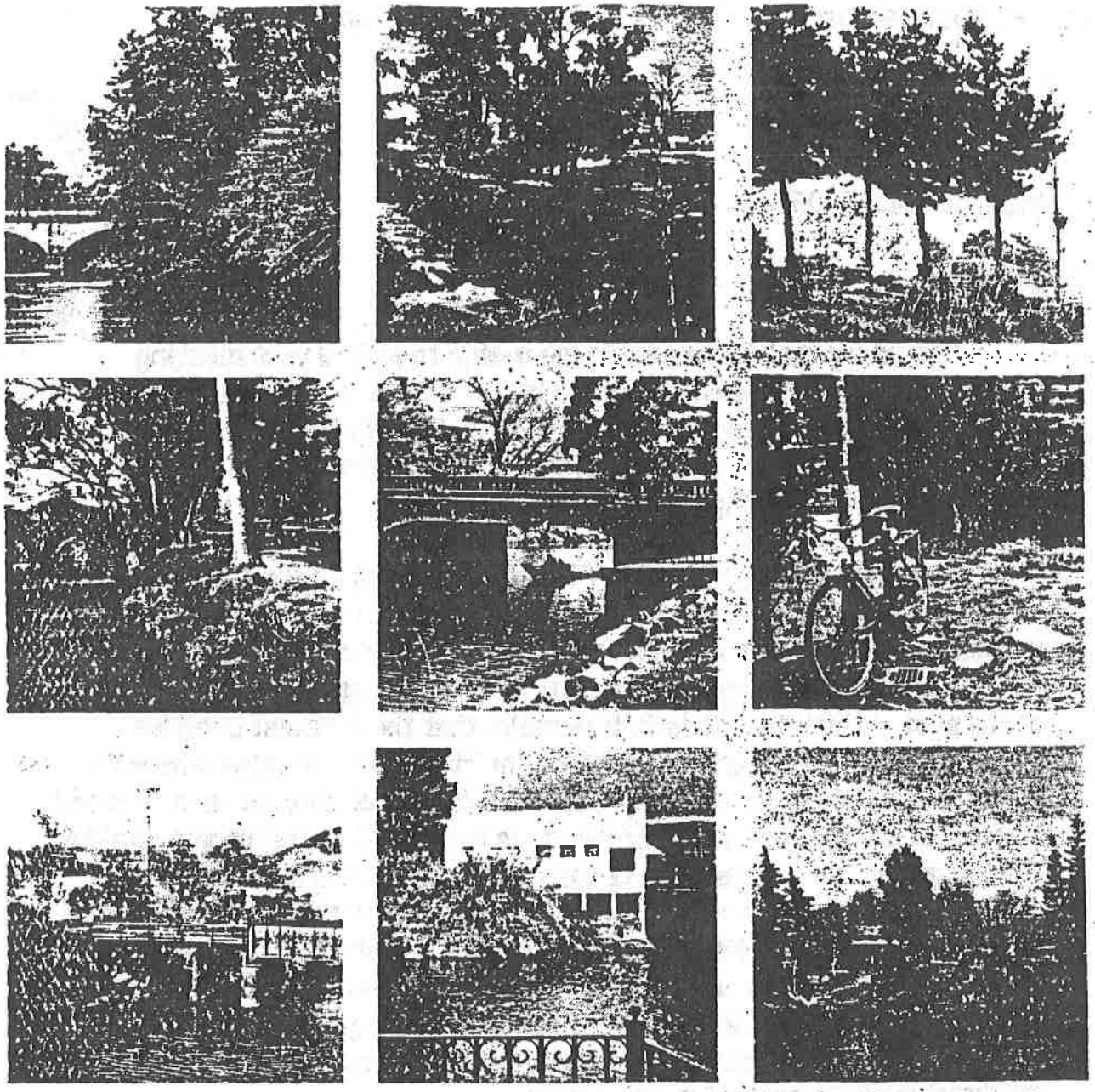
Why isn't there a conservation element to the plan maintaining, enhancing , restoring and **<u>creating</u>** riparian and wildlife corridors? 2.7

Friends of the Napa River will continue to work on comments and make more specific comments concerning the watershed elements of the plan. The economic future of this City depends on its greatest resource the Napa River.

Thank-you

Judith Sears
Friends of the Napa River

APPENDIX E



FINAL ENVIRONMENTAL IMPACT REPORT

NAPA URBAN WATERFRONT RESTORATION PLAN

City of Napa, California

Richard Morehouse Associates

moira johnston

January 9, 1992

City of Napa
Planning Commission
1600 First Street
Napa, Ca. 94559-0660



Dear Sirs:

I am sorry that illness made me unable to attend your meeting January 2, 1992 and present in person my comments on the Draft EIR for the Napa Urban Waterfront Restoration Plan. Gary Sampson graciously mentioned them in his testimony, and I would like now to express them as part of the public hearing process.

Although all aspects of the Plan are important to the creation of the wonderfully revived urban waterfront we all want, I will focus on the physical design aspects addressed in the Plan's Goals and Objectives on page 5, Section 3.1 -- on what could be termed the aesthetic components of the plan. I think that it is in this realm that the greatest positive impact can be made to urban life along the riverfront, but also where the worst disasters can occur if there is not cohesion of concept, and firm and intelligent design control. Good design is not a frill. It is fundamental to the success of this project. It is the way the assemblage of buildings, cafes, patios, piers and walkways looks and works that is going to make this either a mecca to Napa Valley's residents, a national (and even international) model of urban riverfront development -- or a mediocre, piecemeal effort that fails to seize one of the last great opportunities in Napa Valley to create something life-enhancing, something respectful and celebrative of the natural river resource.

Cohesion and control of design should, I believe, be included in the EIR as part of the environmental impact of the project. It is not. I believe that a committment to world-class design and the establishment of design review and control is a requisite for the project, and should be included now at the EIR stage or, certainly, in the final stage of the plan that is to be implemented. I am not recommending a cutesy, psuedo-Victorian riverfront theme-park 'village'. But I am strongly recommending that consistency and integrity of design be assured, and that it be built into the

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project right now, at the EIR level, so that, as buildings develop over time, that consistency and quality will not be left to the whims of developers with their inevitably short-term, profit-driven vision. What we must prevent is the travesty that can be seen on the urban waterfront in Petaluma where a small mall has been built on the cornerstone river frontage downtown facing away from the river. It offers the view, literally, of the back doors and garbage cans of characterless rectangular boxes. I cite as an outstanding example of consistency the Granville Island project in my native Vancouver, Canada, where old and new buildings alike were unified by the authentic theme of corrugated metal roofs and sidings, the 'look' and materials of the industrial area that had existed -- and still exist -- on the site. 1

I do want to complement the Sasaki report's approach to the aesthetic/architectural elements of its goals and objectives; it is a sensitive, 'quality' approach with respect to scale, historic character, orientation to river, etc. But these are only guidelines -- recommendations. More specific protection of this environmental component is needed. I will be expressing my concerns to the General Plan Commission and to the City Council, as well, and would be happy to meet with you or any group to expand on these comments.

I thank you very much for your courtesy, interest, and sense of responsibility towards this vital project. I wish you wisdom, vision, and a little good luck in your deliberations and decisions.

My warmest best wishes,

Moira Johnston Block

RESPONSE TO LETTER FROM MOIRA JOHNSTON

1. Inclusion of project design issues in the EIR. Impacts of project design on the environment under CEQA normally are limited to project compliance with policies and guidelines which are adopted by affected jurisdictions. In this case, there are no policies and guidelines in the Napa General Plan or other adopted plans against which to evaluate the proposed project. Therefore, the assessment of visual impacts of the project in Chapter 9 is limited to discussion of potential adverse changes to the natural environment, rather than changes to the built environment. Concerns about the urban design character of the project could logically be addressed at subsequent phases of design of project components.

APPENDIX G
POLICIES AND PROGRAMS RELATED TO WATERSHED

This appendix is a compilation of policies and implementation programs located in various sections of the *Draft Policy Document* that address watershed management issues.

Chapter 1: Land Use

LU-1.7. The City shall enhance the Napa River as a natural corridor and recreational spine connecting neighborhoods, employment areas, and other destinations. *(See Chapter 5, Parks and Recreation).*

LU-3.9. The City shall coordinate growth and development with surrounding jurisdictions, the Local Agency Formation Commission (LAFCO), Congestion Management Agency, Napa County Flood Control District, and other agencies as appropriate to maintain open space between communities and promote common goals.

LU-6.4. The City shall promote riverfront development that reorients downtown to the Napa River and shall encourage creative designs during the development review process.

LU-6.5. The City shall provide for development of hotel and conference facilities in the downtown area. The City shall encourage any hotel developer to tie the facility to downtown and riverfront restoration through physical improvements and joint promotional involvement.

LU-6.6. The City shall enhance public access to the downtown, including a stronger link to downtown residential neighborhoods, through improvements to directional signs, roads, transit, and pedestrian and bike trails along streets and the river.

LU-6.10. The City shall continue to support development of public amenities along the Napa Riverfront such as parks, plazas, trails, docks and landscaping.

LU-6.A The City shall prepare a plan, including land use goals, a business incentive program, and design guidelines to promote high quality private and public development and redevelopment in the downtown. The plan should address design alternatives that would better incorporate the Napa River as a commercial and recreational focus for downtown.

Responsibility: Redevelopment and Economic Development Coordinator; Planning Department; Community Resources Department; City Council

Time Frame: FY 00-02

LU-9.1. The City shall promote an urban form that integrates the urban environment with the city's natural features.

LU-9.2. The City shall continue to apply special development standards to proposed development within or adjacent to the following areas:

a. Riparian corridors and wetlands (including the Napa River);
b. Hillsides;
c. Critical wildlife habitat; and
d. Agricultural land outside the RUL

LU-9.3. The City shall encourage the maintenance of wildlife corridors (*as described in Chapter 7, Natural Resources*) and discourage the fragmentation of large natural plant communities when environmentally-sensitive sites are developed.

LU-9.5. When proposed development within the density ranges prescribed by the underlying land use designation is inconsistent with conservation of critical environmental resources, the City Council may reduce the project size, scale, or density (to less than the minimum density) provided the City Council makes one or more of the following findings:

a. The site has specific physical constraints which may include but not be limited to geologic, flood, fire, or erosion hazards, that substantially limit design and development alternatives; or

b. The site has specific environmental or cultural resources which may include but not be limited to riparian or marshland/wetland areas, archaeological or other historical resources that would be adversely affected by a projected developed at the minimum densities prescribed by the General Plan; or

c. The site is adjacent to or close to (within ¼ mile) of important agricultural resources or other areas devoted to permanent agricultural activities which in the City Council's judgment are significant and would be adversely affected by a project developed at the minimum densities prescribed by the General Plan.

LU-9.6. The City shall develop programs which mitigate potential flooding impacts along the Napa River to allow for efficient use and rehabilitation/development of lands near the river. *(See "Flooding" section of Chapter 8, Health and Safety.)*

Chapter 3: Transportation

T-9.3. The City shall develop a major public multi-use trail and amenities along the Napa River from Stanly Ranch to Trancas Street, and along Salvador Channel, while protecting the natural resources along the trail corridor. If feasible, establish a multi-use trail along the Wine Train Railroad right-of-way. *See also "Trails" section of Chapter 5, Parks and Recreation.*

T-9.4. The City shall connect the city's major planned trails (*as identified in Chapter 5, Parks and Recreation*), to the proposed regional Ridge and Bay Trails, connecting all of these major pedestrian and bicycle routes to downtown.

Chapter 4: Community Services

CS-11.5. The City shall develop stormwater management programs to reduce water borne pollution discharges to the maximum extent practicable.

CS-11.6. The City shall require new development to obtain all necessary NPDES permits as required by federal law.

CS-11.7. The City shall require all new development to implement feasible best management practices (BMP) in the design of stormwater systems.

CS-11.8. The City shall require all projects in the floodplain to comply with applicable federal, state and local regulations.

CS-11.9. The City shall work with the California Department of Fish and Game and Napa County Resource Conservation District to develop an acceptable and appropriate homeowners' stewardship program aimed at reducing flooding along creek and river side properties.

Chapter 5: Parks and Recreation

PR-1.2. Citywide parks, open space areas and trails shall include both active and passive recreational amenities of significance to the whole city. The target standard for provision of citywide parkland shall be 6 to 10 acres per 1,000 residents. The service area of citywide sites includes the entire city and citywide facilities may be located in any part of the city. Sites in this category will typically be in excess of 50 acres, although some are less than 50 acres. Citywide facilities should include parking areas and restrooms. Citywide facilities are further defined as follows:

a. ***Citywide Parks*** include major active recreation facilities such as ballfields, or specialized facilities such as boat launches. Citywide parks should include provision for group activities including group picnic areas.

b. ***Citywide Open Space Areas*** provide opportunities for passive activities such as hiking and picnicking.

c. ***Citywide Trails*** provide connections within the city, and to regional trails. Citywide trails include the Napa River and Salvador Channel Trails.

PR-1.5. The City shall improve community park service in the area currently under-served east of the Napa River (Quadrant 4) by acquiring a new site, by expanding an existing park, or through a joint use agreement with the NVUSD.

PR-3.1. The City shall consider the Napa River and tributaries as a primary natural corridor that forms an organizing spine for the open space system within and extending beyond the city.

PR-3.4. Where appropriate, the City shall locate new parks, trails, and overlooks adjacent to areas that are protected from development for reasons of resource protection, safety provision, or historic preservation, including areas along the Napa River and Salvador Channel, its tributaries, and on the hillsides, to provide contiguous open space areas, extend resource protection, and increase perceived or actual extent of publicly accessible area.

PR-3.8. The City shall promote access to publicly-owned natural areas beyond the city, such as the Napa River marshlands, Skyline Park, and watershed areas where possible, via existing and proposed trail segments, to extend the passive open space recreational opportunities for Napa residents.

PR-5.1. The City shall provide for a trail system that provides connections with open space areas in and outside of the city. In the city, trails should connect Kennedy Park, Westwood Hills Park, Timberhill Park, and Alston Park with the Napa River Trail. Outside the city, trail destinations should include the Napa Marshes, Skyline Park, watershed areas, and views of vineyards and other agricultural lands.

PR-5.2. Trails shall be located off road, following creeks wherever possible. As trail opportunities are limited, on-road connections should also be included to link the off-road sections of the system. These connections should be included in the *Bicycle Facilities System*. The trail system should consist of the following components. Alignment possibilities are included in Appendix D.

a. Napa River Trail south: east bank
b. River Trail south: west bank
c. River Trail north on Salvador Channel to Alston Park with connection to Las Flores Community Center

d. Napa River Trail east to Skyline Park
e. Napa River Trail to Westwood Hills and Timberhill city parks
f. Other creek connections to the Napa River trail
g. Connections to surrounding county areas

PR-5.7. In creekside areas, the City shall develop trails outside any riparian setback requirements wherever possible.

PR-5.12. The City shall identify potential linkages along easements and rights of way to publicly accessible open space lands in the Napa vicinity, such as the Napa marsh.

PR-5.18. Where trails are joint-use, such as for utility access and along flood control channels, the City may share capital improvement and maintenance costs.

PR-6.1. The City shall develop a major public multi-use trail and amenities along the Napa River from Stanly Ranch to Trancas Street and along the Salvador Channel, while protecting and enhancing the natural resources along the trail corridor.

PR-6.2. The Napa River Trail shall be developed according to design guidelines adopted by the City.

PR-6.3. Trail development shall be consistent with protection and enhancement of wildlife habitats along the River. The City shall identify potential areas for habitat preservation and enhancement along the river during the preparation of trail design and development plans. The City shall design and locate the multi-use trail to minimize impacts to sensitive habitats and resources wherever possible.

PR-6.4. The City shall link the Napa River Trail to other trails, parklands and community resources including downtown and river-oriented businesses.

PR-6.5. The City shall provide trail access points, staging and rest areas, and other amenities, such as boat launches and enhanced fishing areas. Facilities should be designed to meet accessibility standards whenever possible. Facilities should accommodate boat traffic, including some oriented toward commercial/tourist river boating, as well as recreational boating.

PR-6.6. The City shall establish a continuous trail corridor and sites for trail-related amenities. The City shall pursue various methods for acquiring a trail corridor, including coordinating with other public agencies and utility companies and negotiating with property owners for an easement or fee title for a trail corridor.

PR-6.7. The City shall work with the Army Corps of Engineers to ensure that the Napa River Trail is incorporated into any flood control project.

PR-6.8. The City shall conduct appropriate site investigations to identify any contaminated soils and/or groundwater which could affect public health along the proposed trail and staging areas near the River and shall

identify mitigations to ensure adequate remediation.

PR-6.9. The City shall obtain easements and develop the proposed improvements described in the *Napa Urban Waterfront Restoration Plan* whenever feasible.

PR-6.10. The City shall establish financial strategies for acquiring and developing the Napa River Trail and facilities. These financial strategies may include the following:

a. Allocate funds for Napa River Trail when appropriate and necessary to use as leverage for additional funding.
b. Pursue various grant and funding programs from public and private sources.
c. Establish donation program through the Foundation for Napa Recreation.
d. Organize special fund raising events.

PR-6.11. The City shall prioritize and phase trail development, taking into account funding and acquisition opportunities.

PR-6.12. The City shall identify and pursue feasible demonstration projects.

PR-6.13. The City shall provide for long-term maintenance, safety and security of the trail.

PR-6.14. The City shall prepare and adopt a trail sign program to address trail safety and etiquette.

PR-6.15. The City shall provide adequate access for emergency and maintenance vehicles along the trail.

PR-6.16. The City shall establish a strong connection between the community and the Napa River and its unique resources.

PR-6.17. The City shall solicit participation of the business community in trail planning and development.

PR-6.18. The City shall involve neighborhoods in the process of designing trail segments and amenities.

PR-6.19. The City shall establish education displays for wildlife habitats, cultural and historic sites.

PR-6.20. The City shall promote programs within schools which focus on the Napa River.

PR-6.21. The City shall work with historic and environmental organizations to devise educational programs and events.

PR-6.22. The City shall establish River Square, between First and Third Streets on the west side of the River, as a central active place of the community.

PR-6.23. The City shall incorporate historic architectural elements in design of waterfront components, including renovation and reuse of historic structures such as the Hatt Building.

IMPLEMENTATION PROGRAMS

PR-6.A The City shall establish an ongoing trail inspection and maintenance program.

Responsibility: Community Resources Department

Time Frame: FY 00-02

PR-6.B The City shall establish a volunteer program to assist in trail cleanup and security patrols.

Responsibility: Community Resources Department

Time Frame: FY 00-02

PR-6.C The City shall increase public access to the water at Veterans Park.

Responsibility: Community Resources Department

Time Frame: FY 02-04

PR-6.D The City shall enhance access and development of China Point Park as the northern edge of River Square.

PR-7. 7. The City shall participate in annual cultural events (e.g., Napa Wine and Crafts Fair, Friends of the River Festival).

Chapter 6: Historic Resources

HR-1.16. The City shall work with other agencies to ensure that any future flood control project does not sever the historic relationship between the river and the adjacent historic neighborhoods and commercial areas.

HR-1.18. The City shall identify its historic gateways and support the preservation of their historic bridges, stone walls, street trees and viewsheds.

Chapter 7: Natural Resources

NR-1.1. The City shall protect riparian habitat along the Napa River and its tributaries from incompatible urban uses and activities.

NR-1.2. The City shall identify existing wildlife habitat corridors and seek to protect them from being severed or significantly obstructed.

NR-1.3. The City shall encourage the planting of native plant species in natural habitats.

NR-1.4. The City shall review all future waterway improvement projects (e.g., flood control, dredging, private development), as well as all projects that are within 100 feet of the waterway, to ensure that they protect and minimize effects on the riparian and aquatic habitats. The City shall also encourage native plantings along the river and creek banks to stabilize the banks, reduce sedimentation, reduce stormwater runoff volumes, and enhance aquatic habitats.

NR-1.5. The City shall pursue federal and state funding to restore and enhance wetland, riparian, and fish habitats.

NR-1.6. The City shall require as a condition of approval that development provide protection for significant on-site natural habitat whenever possible. If such habitat cannot be avoided without loss of any economic use of the land, the City would permit equivalent mitigation off-site.

NR-1.7. During development review, the City shall endeavor to identify and protect significant species and groves or clusters of trees on project sites.

NR-1.8. The City shall provide controlled access points in designated areas to prevent unrestricted public access to riparian habitat on public lands.

NR-1.9. The City shall continue the existing program for hazardous waste collection events to allow the public to safely dispose of pollution-causing products.

NR-1.10. The City shall pursue appropriate new management practices for reducing the impact of pollution from urban activities. *See Storm Drainage section of Chapter 4, Community Services.*

NR-1.11. The City shall continue to enforce the Fire Prevention Abatement program to protect riparian habitat from destruction by fire.

NR-1.12. The City shall provide for the use of permeable or semi-permeable materials for parking lots and other off-street paved areas.

NR-1.13. The City shall require that the composting and recycling of landscape maintenance debris be located so as to avoid adverse impacts on wetland, riparian, and fish habitat.

IMPLEMENTATION PROGRAMS

NR-1.A The City shall review and modify as necessary existing regulations for the conservation and management of marsh, wetland, riparian, wildlife and plant habitats to ensure consistency with the General Plan.

Responsibility: Planning Department; City Council

Time Frame: FY 02-04

NR-1.B The City shall continue to rezone properties in marsh, wetland, oak woodland and riparian habitats to be subject to the provisions of the Conservation and Safety Regulations of the City's *Zoning Ordinance*.

Responsibility: Planning Department; City Council

Time Frame: FY 02-04

NR-1.C The City shall develop guidelines and regulations to allow new development to enhance and/or create off-site habitat on public or private land if the new development causes the degradation or removal of significant on-site habitat.

Responsibility: Planning Department

Time Frame: FY 02-04

NR-1.D The City shall investigate the possibility of an ordinance to establish a maximum watercraft speed to protect against bank erosion from wakes, and shall develop informational/instructional signage for watercraft users.

Responsibility: City Council; City Attorney; Police Department

Time Frame: FY 98-00

NR-1.E The City shall continue to require implementation of sensitive construction practices that minimize erosion and sedimentation, protect important native trees, restrict riparian encroachment, and maintain unobstructed drainageways.

Responsibility: Planning Department; Public Works Department

Time Frame: Ongoing

NR-3.3. The City shall support stenciling storm drains to identify the location of direct inflow to waterways from storm drains.

NR-4.1. The City shall support the maintenance and improvement of surface and ground water quality.

NR-4.2. The City shall support the maintenance and improvement of water quality in the Napa River.

NR-4.3. The City shall support the monitoring and assessment of the effects of dredging in the Napa River.

Chapter 8: Health and Safety

HS-3.1. The City shall continue to provide for floodplain management to protect its residents and property from the hazards of development in the floodplain of the Napa River and its tributaries.

HS-3.2. The City shall continue to apply flood plain management regulations for development in the floodplain and floodway.

HS-3.3. The City shall continue to participate in the Federal Emergency Management Agency's flood insurance program.

HS-3.4. The City shall continue to utilize the Federal Emergency Management Agency's Flood Insurance Rate Map to define the flood hazard area, the floodway and the floodplain.

HS-3.5. The City shall balance the housing needs of its residents against the risk from potential flood-related hazards.

HS-3.6. The City shall support programs and methods to reduce the flooding of the Napa River and its tributaries.

HS-3.7. The City shall promote and assist the Army Corps of Engineers, Napa County, other responsible agencies, and the public to obtain funding and develop a Napa River Flood Control Project if found to entail an acceptable environmental and financial cost.

HS-3.8. The City shall cooperate with Napa County to establish a reliable funding source for the local share of flood control costs.

HS-3.9. If flood control is found to be infeasible, or if a flood control project is not underway or funded by the year 2000, the City shall evaluate alternative means of addressing flooding that will allow development in areas currently constrained by floodplain, Flood Evacuation Area, or Floodway designations. Options to be considered shall include, but are not limited to, the following:

a. Modification of the Flood Evacuation Area standards to permit residential development under certain conditions providing that programs are in place to adequately address life and safety issues.
b. Direct and indirect assistance to property owners (through the redevelopment agency, fee waivers).
c. Preparation of a more limited flood control plan to reduce the impact of flooding and allow development within parts of the flood area.
d. Consideration of alternative development standards which would allow future developers to recoup higher site preparation and development costs.
e. Incorporation of evacuation measures into the City's Standardized Emergency Management System, with public education/notification programs, and an "early warning" system similar to a civil defense siren system.
f. Special construction and/or site design to adequately protect the safety of future residents.

HS-8.6. The City shall review and revise its evacuation routes periodically and make provisions for early removal of debris deposited by flood and inundation events in prioritized areas near critical and essential facilities.

COMMUNICATION #3
DELIVERED TO THE PLANNING DEPARTMENT 10/18/96.

APPENDIX E

Friends of the Napa River

3.

The Landmarks Building
1026 First Street • Napa, CA 94559
Phone (707) 255-8646 • Fax (707) 255-2164

10/18/96

John Yost
Planning Director
City of Napa Planning Department

RE: Planning Commission hearing 10-17-96

Dear Mr. Yost

These "guidelines" were mistakenly left out of the packet at the hearing last night, please include them. 3.1

Friends of the Napa River were very disappointed that the DEIR for the General Plan was not going to be heard until after 10 or 11 P.M. last night. A matter of such importance should be given more time especially since the study sessions don't allow for public comment.

Thank-you

Judith Sears

Friends of the Napa River

For Release April 12, 1996:

The Landmarks Building
1026 First Street • Napa, CA 94559
Phone (707) 255-8646 • Fax (707) 255-2164

INTERIM GUIDELINES FOR THE CITY OF NAPA'S URBAN RIVERFRONT

These interim guidelines are a work-in-progress prepared in response to urgent community need. They are a set of guiding principles, voluntary and advisory for now, for everyone, public and private, involved in the development and restoration of Napa's urban riverfront. They are an attempt to forge a cohesive articulation of the vision, growing for several decades, of restoring Napa's scarred river to vibrant health and returning Napa's downtown waterfront to the hub of dynamic activity it was -- the heart of a revitalized river district which will bring huge economic, cultural, and recreational benefits to the entire Napa Valley as well as to visitors. As planning for the first exciting projects (Center for Wine Food and the Arts, Hatt Marketplace, Noyes Lumber site) moves ahead, as a sensitive and beautiful flood control project emerges, as downtown improvement initiatives proliferate, we need a common language for the urban riverfront *now. Successful river cities have guidelines.*

The design and development professionals and urban river stakeholders who contributed to these guidelines drew on a rich legacy of ideas: the Roma and Sasaki plans, the City's River Trail, Renaissance Napa, and myriad community efforts. It drew on the experience of many other river cities, from San Antonio to Portland, which have already learned the potent power of a river as a revitalizing force. We have the potential to be the national model for urban rivers, but we must do it right. These guidelines are a starting point, to be further developed to a professional level, then adopted by the City Council, and integrated into an urgently-needed specific plan for the downtown river district and into the new General Plan. These principles will, we hope, be embraced by the community, by landowners/developers along the river, and in public policy, zoning, and development standards. Emerging in tandem with the community's alternate flood management plan, they will, we hope, encourage wonderful, quality projects along the river.

We urge the City to encourage and expedite projects sensitive to these guidelines, and to discourage projects that are not. The guidelines apply with or without flood control. Like the living river, this is a living document; comments are welcomed.

* * * * * *

Contributors: Moira Johnston Block - Guidelines Chair, Juliana Inman, Karen Rippey, Dorothy Lind, John Whitridge, Vince DeDomenico, Mike McKaig, Barbara Stafford, Harry Price, Bill Bylund, Chuck Shinnamon, Liesel Eisele, Farnum Kerr, Dick Williams, Philip Vandetoolen, John Clifton, Tony Norris.

APPENDIX E

GUIDELINES FOR CITY OF NAPA'S URBAN RIVERFRONT:

The goal of these guidelines is to guide the community to achieve a unique urban riverfront which: 1) will be a festive, vibrant, and compellingly attractive locus for public gathering which reflects the spirit and nature of Napa Valley, 2) maintains and restores the Napa River as a healthy, living river, and captures the magic and beauty of the river, and 3) brings, as a by-product of those two goals, broad-ranging and enduring social and economic benefits to our entire Napa Valley community.

General Character:

: The urban riverfront is defined, here, as from the north end of the Oxbow to south of the Hatt Building, with the lower reach of Napa Creek and a proposed bypass included.

: The health and biological diversity of "the living river" must be consistently maintained as the river co-exists with the human community along its banks.

: The urban riverfront should be a lively, festive, and attractive public gathering place for cultural, commercial, and recreational uses that reflects the friendly, historic, 'village' quality and scale of our city and riverfront. All architectural, landscaping, and design elements should enhance and support that.

: All projects should be oriented towards the river, acknowledging and enhancing both the river and Napa Creek. The river is not the back door. The river 'door' should receive equal or greater design attention than the street 'door.' Service and utility uses should be avoided on the riverfront.

APPENDIX E

: Linkages are vital, creating connections between the riverfront , the waterway, and the surrounding community. Linkages are important, too, in achieving the vision of a multi-mode transportation system of linked river ferries, an extended train system, shuttle buses to upvalley, and a network of pedestrian pathways which would benefit the entire Napa Valley by reducing automobile use in this fragile agricultural valley.

: Buildings: Architecture and building materials should be reflective of and sympathetic to the several historical architectural styles and structural forms of the Napa Valley. The imposition of a single building theme or style along the entire length of the waterfront is not recommended; rather, the design of new development should be scaled and detailed in a way that complements the historic character and role of Napa's riverfront, without resorting to contrived or overly thematic approaches that could soon become outdated. This does not exclude fine contemporary architecture, if 'spirit', landscaping, and materials are compatible with neighboring riverfront and habitat integrity.

: The River Corridor and the continuous River Trail are the unifying features of the urban riverfront, a unity which should be achieved by the cohesive 'look' and flavor, the aesthetic spirit, of the riverbank, trails, decks and promenades and by a consistency of materials and design (in common elements such as surface, lighting, trail "furniture", guard rails, trees and plantings). The Trail through the urban riverfront would connect people to the more pastoral river trail to the north and south which would offer a variety of recreational experiences -- wetlands, sports fields, fishing sites, equestrian paths, for example.

: This is a pedestrian area, requiring a critical mass of people to be successful. Development designed to the criteria and in the spirit of the 'urban riverfront' should be concentrated within its defined boundaries and not be permitted to sprawl and leapfrog beyond them, as it would do three negative things: create a 'commercial strip' not unlike the faceless, town-destroying automobile strips of America; dilute the needed concentration of pedestrian traffic; and 'eat' into the green belt open space which must also be developed and preserved along the river. These goals must be achieved and controlled through zoning and the General Plan.

: Open space. A percentage of each project should be devoted to open space -- spaces which invite a meandering flow and clustering of pedestrian traffic, with visual surprises, seating areas, river vistas, focal 'gathering spots' (fountains, sculptures, etc.), shade trees, cafe decks, flower baskets, banners, color in flowers and plantings, etc.

Specific Guidelines for Use and Design:

(These can only be preliminary approximations until the flood control design is complete, and until a more rigorous, detailed and professional set of development criteria can be prepared with guidance of City staff)

: All structures and improvements should be designed, sited, constructed and maintained to anticipate that flooding *can* occur with or without the 100-year flood protection which is the goal (the 101-year event happens!). Inexpensive flood-proofing and floodable ground floors, plazas, and landscaping should be incorporated.

: Access: The community must have access, both physical and visual, to the river and River Trail through buildings, corridors, arcades, and walkways from street. Access pathways should be treated as elements of the riverfront, with landscaping and attractive and inviting architectural treatment. There must be pedestrian linkages to the surrounding neighborhood -- to downtown, the Center, the Wine Train, Expo, etc., perhaps including a pedestrian bridge over the river at some point. Bicycles and boats could be part of the 'people moving' system; in Seattle, city-owned bikes are available on the street, free, for anyone to use. Fences should not block access and should be subject to the same general design criteria as buildings.

: Safety and maintenance should be, primarily, the responsibility of owners and tenants, and provisions for both must be built into design of buildings and landscaping to assure an ongoing quality experience. Public access and easements may also require City involvement in control, maintenance, and enforcement policies. For example, the River Trail, which will probably be defined by a public easement, may well be a City responsibility. Since private

owners are encouraged to give public access to the river and River Trail, a public/private partnership for safety and maintenance makes sense.

: Signage, lighting, and sound: Should be sensitive to and reflect the nature of our charming, historic, small town riverfront. Commercial name-brand neon signs should be controlled. Ampiified sound should be controlled by decibel standards.

: Setbacks: A complex and controversial issue which cannot be rigidly fixed at this time, but which must, 1) be integrated into the emerging flood management design and, 2) reflect the best current materials, design technology, and biological standards for a built environment which will protect the living river and respect natural river dynamics (point bars, bankfull state, erosion, etc). In some areas, sloped and widened banks, and substantial setbacks may be the solution; in those few, short reaches where the banks have already been severely modified and impaired and where 'hardscape' may be required, it may be river-friendly floodwalls, cantilevering and even piles. Setbacks should accomodate River Trail, decks and promenades. A range of setbacks is possible, given current techniques for bank treatments that protect habitat, contain erosion, preserve water quality, and respect the river's hydrology. The setback for each project will have to be carefully evaluated for river health and compatibility with neighboring projects. Setbacks that create varied experiences along the river (plazas, courts, stepped levels, stairs to river) are encouraged.

: Quality, sensitivity, and compatibility are the bywords for buildings.

: Historic restorations should be done with integrity and authenticity. Refer to: Secretary of the Interior's Standards and Guidelines for Rehabilitating Historic Buildings.

: In single-use projects such as hotels or larger restaurants, monolithic walls and facades are to be avoided. Encourage pedestrian access with visual interest, flow and ambience into and through structures.

APPENDIX E

: Materials reflecting Napa's traditions should be encouraged -- *real* stone, brick, wood, etc. Discourage large expanses of glass, especially reflective glass, and overuse of concrete, for example.

: Development Massing: New development should preserve the rhythm and scale of the historic existing buildings and of nearby Main Street. Density should be varied, with clustered commercial next to open river vistas.

: Uses: Diverse multi-use is envisioned for the urban riverfront. The current Tourist/Commercial land use designation is scheduled to be changed to Mixed Use in the City's new General Plan. Appropriate uses are those compatible with a variety of tourist/commercial/retail/cultural/ residential/social/ recreational purposes of both visitors and residents, tourists and Napans, of all ages.

: Residential living space 'above the store' should be encouraged as part of the dynamic mix of uses perceived for developments. Young working couples, retired, and seasonal residents would bring year-round, round-the-clock vitality to the riverfront district.

: Cultural uses should be encouraged. The presence of the American Center for Wine, Food and the Arts, Jarvis Conservatory, Opera House, Main Street galleries, and annual River Festival with the Napa Symphony create a cultural nexus which could be expanded, for example, with a riverside ampitheatre (Veterans Park is one suggested site), public sculpture, street performers, artists studios, art galleries, open-air concerts, more well-done historic wall murals. The City might establish a "cultural arts district" overlaying the riverfront district, as Eureka has done.

: Retail shops should be of an intimate, quality nature appropriate to a world center of wine, food and good living and yet offer some 'real life' services that will make it attractive to Napa's families as well as to tourists. An indoor, year-round farmer's market would be an excellent element (Vancouver, B.C.'s Granville Island and Seattle's Pike Marketplace are successful examples). Restaurants and cafes of high quality and diversity are encouraged.

: Examples of inappropriate uses: Fast food chains, convenience stores (7-11s), single-use office or institutional buildings, industrial uses, low-end factory outlets.

: Banks and Landscaping. Although the short urban reach of the river will, with flood control, be somewhat modified from its natural state and configuration, all efforts should be made in landscaping to restore and enhance the natural living quality of the river's edge through native plants endemic to the Napa River, and wildlife and fish habitats. This will give continuity to the river corridor and ensure a healthy riparian environment; optimally, a continuous necklace of reeds and other emergent plants at the water's edge protects fish from predators. This is an urban river, however, and landscaping of buildings and plazas need not fully recreate a natural riverbank. In those short reaches where a hard edge cannot be avoided, innovative, more natural solutions should be utilized for bank stabilization. Displays of color are appropriate, particularly at key entry points to the river corridor and at linkage points to other greenways. Exotic plant material that is documented as being invasive, alleolopathic or otherwise overly competitive shall be exluded from the landscape. Sites shall be protected from erosion during construction, and existing trees protected, where appropriate. Topsoil native to the site shall be used in landscaped areas, if possible. Proper drainage must be designed.

: Parking: Parking lots should not front on the river. If possible, no surface or stacked parking should be on the river-side of Soscol or Main Street. Well-designed parking structures which blend into the river district may have to be built a block or two back from the riverfront. Where parking can be accomodated on site, it should be basement or depressed parking, where feasible. The City should be encouraged to work with developers to find off-site parking locations, and Redevelopment might assist the first developers with financing.

: Use the river as a waterway, building small docks (floating, or best technology available) for small shuttle boats and private boats, where possible, to make the river a dynamic link in the transportation system as it was historically. The concept of 'coming to lunch by water' should be integral to the concept of the riverfront. San Antonio's very popular use of small pontoon boats to shuttle people to several designated stops along the River Walk could be adapted to

the Napa River. There is much enthusiasm for a ferry service from San Francisco and/or other points on the Bay. Because of the hours it takes to motor by boat to downtown Napa, facilities should invite it being a boater's destination for an overnight stay. At least one small 'safe harbor', perhaps at the site of the historic wharf south of the Hatt Building, is encouraged. No-wake speeds and engine noise on the river will be strictly controlled north of Kennedy Park.

: Maximum height for riverfront structures: 3 floors or 45 feet. No more than two floors on river-facing facade. Step backs required for buildings taller than two stories. Consideration will be given to special architectural elements which may exceed 45 feet, on a case-by-case design quality basis. These standards should be reevaluated when the final flood control design is complete.

: Water runoff: Runoff from new development should be impounded and released at a rate of discharge equal to the rate of discharge from the undisturbed site. Use the most practical, technologically-best solution for controlling runoff flows.

: New bridges should be beautifully designed, reflect the valley's famous traditional bridges, and have open views of the river through railings. Because of the visual prominence of bridges in the riverfront project, bridge design competitions are encouraged.

: Projects must accomodate maintenance activities appropriate for an urban/riparian interface environment.

: Absent any formal evaluation mechanism at this time, project evaluation could be done by an ad hoc Urban Riverfront Project Evaluation committee of competent professionals, in addition to City staff and the Planning Commission.

Welcome Back to the River!

4.

Chamber of Commerce

GENERAL PLAN
COMMUNICATION #4

October 15, 1996

RECEIVED
OCT 18 1996
City Clerk's Office

Mayor Brad Wagenknecht
City Council
City Hall
Napa, California

RE: Napa City General Plan

Dear Brad,
The Legislative Review Committee and the Executive Committee of the Napa Chamber has stated its position on the General Plan of the City of Napa in the attached letter.

We feel very strongly that we must get a commitment from the City for developing the Economic Element for the General Plan immediately. That does not mean that we insist that the General Plan be held up, but that the resolution and budget commitment be made prior to the approval of the General Plan. 4.1

This is an opportunity for the private and public sectors to work together on a mutually beneficial issue and I can assure you that the Napa Chamber is fully committed to work with the City to develop the Economic Element. We see the Economic Element much like a business sees a business plan in that it justifies the "want list" with reality (funding); and, we feel certain that the addition of an Economic Element will answer many questions which are presently unanswered by the General Plan.

We hope that ultimately as the Plan goes through the approval process that our wishes will be considered and be realized. As such, we stand ready to serve in what ever capacity it takes to bring about the Economic Element.

Sincerely,

Charles B. Bogue
President

(Reference to General Plan communication #1)

1556 First Street • P.O. Box 636 • Napa, CA 94559 • 707-226-7455 • Fax 707 226-1171

APPENDIX E

Louise Clerici
4032 Wisteria Way
Napa, CA 94558
October 28, 1996



Mr. John Yost, Planning Director
Planning Department
P.O. Box 660
Napa, CA 94559

5.

GENERAL PLAN COMMUNICATION #5

Dear Mr. Yost:

I'm writing this letter in response to the October 1, 1996 Draft Environmental Impact Report prepared by Ogden Environmental & Energy Services Company for the City of Napa General Plan (SCH #95-03-3060).

My comments are as follows:

1. STATEMENT

Page S-12 Water Supply #3 "Development accommodated by the Draft General Plan would not result in demand in excess of the City of Napa's water supply system." The level of significance after mitigation was described as "insignificant".

Page 176 - Draft Environmental Impact Report for the Big Ranch Specific Plan dated March 1996 "Significance after Mitigation" - "Implementation of Mitigation Measure 4.9-1 would reduce cumulative water distribution impacts to a less-than-significant impact. Implementation of Mitigation Measure 4.9-2 could reduce cumulative water service impacts. However, until firm water sources are found, this would remain a significant unavoidable impact." 5.

Comment:

Which Environmental Impact Report gives an accurate analysis of our current and future water supply, and why?

2. STATEMENT

Page S-13 Wastewater Treatment, Storage, and Disposal - Line 4 "policies and implementation programs contained in the General Plan and implementation of improvements suggested in the NSD's 1990 Wastewater Master Plan would ensure that adequate wastewater treatment, storage and disposal facilities are available." The Level of significance after mitigation was described as "insignificant".

Page 184 - Draft Environmental Impact Report for the Big Ranch Specific Plan dated March 1996 - "Soscol Treatment Plant Capacity" - "According to the NSD, there may not be sufficient capacity at Soscol Treatment Plant for buildout of the BRSPA combined with other development projects in the District. As described above, NSD Master Plan improvements would provide adequate capacity until the year 2012. However, this plan currently is being reconsidered. Until this issue is resolved, the NSD does not know the future capacity of the Soscol Treatment Plant. This would be a potentially significant impact. 5.

Comment:

Which Environmental Impact Report gives an accurate analysis of our current and future wastewater treatment plant capacity, and why?

APPENDIX E

3. STATEMENT

Figure 2-2 Project Area and Rural Urban Limit - The legend identifies the Parcels located outside of Sphere of Influence and the County Parcels within the RUL.

5.3

Comment:

There are 2 shaded areas that are unidentified in the legend. One is at the corner of Trancas Street and the RUL line and the other is adjacent to the Highway symbol (29/121). Please explain their meaning.

4. STATEMENT

Page S-5 First paragraph - "In order to accommodate new development and protect existing neighborhoods, the RUL is proposed to be extended in three locations."

5.4

The three locations are: Area west of Foster Road, Area to the northeast of Big Ranch Road and Trancas Street, Napa State Hospital environs.

Comment:

Who is proposing this?

5. STATEMENT

Page 3.6-2 Environmental Analysis - First paragraph, 2nd sentence:
"According to a 1994 survey, there are 858 acres of vacant land, of which only about half (438) is considered generally developable."

Page 3.9-3 #3 - 2nd sentence:
"Within the RUL, there are approximately 1,037 acres of undeveloped or agricultural land slated for development."

5.5

Comment:

Please explain the inconsistency between the 2 figures with respect to the amount of remaining developable land within the RUL? Which figure is correct?

6. STATEMENT

Page 3.10-1 Air Quality - Line 7:
"Please refer to Tables NR-1 and NR-2 of Chapter 7, Natural Resources, of the Draft General Plan Background Report for recent data from the Napa air monitoring station and state and federal ambient air quality standards."

5.6

Comment:

Table NR-1 lists "Sensitive Plant and Wildlike Species Known to Occur in the Napa Area.

The correct table is NR-4 Page 7-31 "Ambient Air Quality Summary Napa Monitoring Station on Jefferson Street."

7. Comment:

5.7

In the future it would be extremely helpful if all pages of reports, such as this, were numbered numerically in sequence rather than numerically in sub-groups. It would be easier to reference an article or tell if pages are missing.

Yours truly,

Louise Clerici

Memorandum

GENERAL PLAN COMMUNICATION #6

6

To: Glen Newman, Chief
Coast-Cascade Region

Date: October 14, 1996

R37

Telephone: (916) 653-9416
CALNET 437-9416

Attention: Environmental Coordinator
Lake-Napa Ranger Unit

From: **Department of Forestry and Fire Protection**

Subject: 5300 ENVIRONMENTAL PROTECTION
Environment Impact Statement

Name: City of Napa General Plan
County: Napa
Type: Drft EIR
SCH #
DUE DATE:

The above referenced environmental document is attached for your review and comment. Please note the day on which comments are due back to me. If you will be unable to complete your review by that time, please contact me at least seven days before that date so I can request an extension of the review period.

( ) Commented or consulted with local government.

( ) Comments attached.
If you have comments, attach them using DEPARTMENT OF FORESTRY letterhead.

(X) No Comment
If you have NO COMMENT, explain briefly on the lines below or use the back of this form. 6.

Name of Reviewer: Evan Jacobsen

Phone: (707) 963-3601

Dale Wierman

Dale L. Wierman
Environmental Protection Officer

elc
Attachment

7.

GENERAL PLAN COMMUNICATION #7

NAPA VALLEY COLLEGE

2277
Napa-Vallejo Hwy.
Napa, California
94558

November 12, 1996

Mr. John Yost
Planning Director
City of Napa Planning Department
P.O. Box 660
Napa, CA 94559

Dear Mr. Yost:

The purpose of this letter is to comment on the City of Napa Draft General Plan and Draft EIR. Several staff from Napa Valley College have reviewed the documents. We have two comments on Chapter 4 of the Background Report, which includes information on the schools in Napa:

1. The report does not include any charts showing enrollment at Napa Valley College. Enrolllment trend reports are available. Please contact me at 253-3371 if you would like to review any of these reports. 7.1

2. Page 4-19 includes enrollment figures for High Schools within the Napa Unified School District. The final entry shows 16 students enrolled in "community college." This is confusing. Does it mean that 16 high school students are enrolled at NVC? Our enrollment reports show that much a higher number of high school students enroll in one or more class at NVC. We suggest that a footnote or other explanation be added to clarify this number. 7.2

Thank you for the opportunity to review the documents.

Sincerely,

Judie Walter-Burke

Judie Walter-Burke
Director, Planning and
Resource Development

METROPOLITAN TRANSPORTATION COMMISSION

Joseph P. Bort MetroCenter
101 Eighth Street
Oakland, CA 94607-4700
Tel.: 510.464.7700
TTY/TDD: 510.464.7769
Fax: 510.464.7848
e-mail: info@mtc.dst.ca.us

8.

November 14, 1996

Dianne McKenna, Chair
Association of Bay Area Governments

James Spering, Vice Chair
Solano County and Cities

Keith Axtell
U.S. Department of Housing and Urban Development

Jane Baker
Cities of San Mateo County

James T. Beall Jr.
Santa Clara County

Sharon Brown
Cities of Contra Costa County

Joe Browne
State Business, Transportation and Housing Agency

Edward R. Campbell
Alameda County

Dorene M. Giacopini
U.S. Department of Transportation

Mary Griffin
San Mateo County

Elihu Harris
Cities of Alameda County

Tom Hsieh
City and County of San Francisco

Jean McCown
Cities of Santa Clara County

Fred Negri
Napa County and Cities

Jon Rubin
San Francisco Mayor's Appointee

Angelo J. Siracusa
San Francisco Bay Conservation and Development Commission

Tom Torlakson
Contra Costa County

Doug Wilson
Marin County and Cities

Sharon Wright
Sonoma County and Cities

Lawrence D. Dahms
Executive Director

William F. Hein
Deputy Executive Director

GENERAL PLAN COMMUNICATION #8

Deborah Faaborg
General Plan Project Manager
City of Napa Planning Department
P.O. Box 660
Napa, CA 94559

Re: City of Napa General Plan Update EIR

Dear Ms. Faaborg:

This letter contains Metropolitan Transportation Commission (MTC) staff comments on the transportation system impact analysis included in the EIR for the City of Napa General Plan Update. The proposed general plan would guide future development in the City of Napa through 2020. The plan includes a buildout population and employment potential of 11,500 new residents, 7,840 new residential units and 14,000 new jobs.

A portion of the traffic generated by development in the City of Napa is likely to have origins and destinations outside the city limits. The draft EIR does not analyze the traffic impacts of the Plan on roads outside of the city. Consequently, please determine whether and to what levels there would be impacts on Route 29 to the north and south of the Napa city limits, documenting trip distribution and assumptions.

8.1

Thank you for the opportunity to comment on the City of Napa General Plan and EIR. If we can be of any assistance, please do not hesitate to call.

Sincerely,

MM Brubaker

Michelle Morris Brubaker
Transportation Planner

cc: Craig Goldblatt, MTC
ABAG Clearinghouse
Commissioner Negri
Commissioner McKenna
Irwin Mussen, BAAQMD

Dedicated to Preserving the Napa River for Generations to Come

950 IMOLA AVENUE WEST
P. O. BOX 2480
NAPA, CALIFORNIA 94558-0522
TELEPHONE (707) 258-6000
FAX (707) 258-6048

9.

GENERAL PLAN COMMUNICATION # 9

NOV 1996
RECEIVED
City of Napa
Planning

November 14, 1996

Deborah Faaborg, General Plan Project Manager
City of Napa Planning Department
P.O. Box 660
Napa, CA 94559

Re: City of Napa Draft General Plan and Draft EIR

Dear Deborah:

The Napa Sanitation District has reviewed the draft copy of the aforementioned document which includes a Background Report, Policy Document and Draft EIR. The District has the following comments relative to sanitary sewer and reclaimed water issues:

Background Report:

1. On page 4-30 under "History of Utility", sentence two of paragraph two should read - "The ~~City of Napa~~ Napa Sanitation District and the then.....".

2. On page 4-30 under "Wastewater Collection and Treatment System", paragraph one, sentence two should read - "The Imola Plant has a ~~daily capacity~~ primary treatment capacity of 8.0 million gallons per day. ~~and uses a primary treatment process.~~" After sentence three add the sentence - "In 1990, NSD began using the biofilters again during the winter months due to excess loading at the Soscol Plant." Sentence four should read - "The Soscol Plant ~~maintained by NSD for the NACWMA~~ has a hydraulic capacity of 15.4 million gallons per day." ~~with 1.54 million gallons per day of oxidation pond capacity reserved for American Canyon's Wastewater.~~

9.1

3. On page 4-33, sentence four of paragraph one which reads "Pasture irrigation and the use of the District's oxidation ponds for summer effluent storage has also helped the NSD reduce its wastewater treatment cost." should be stricken.

4. On page 4-33, paragraph three, sentence two should read - "Many of the sanitary sewer.....through faulty sewer lines and any illegal connections (infiltration and inflow, or I/I)." Sentence three should read - "This extra water can swell the amount of wastewater requiring treatment at the ~~Imola~~ Soscol Plant by as much as 700 percent."

5. On page 4-33, paragraph four, sentence five should read - "Some of these areas may be limited in the amount of development that will be allowed to occur until necessary upgrades to the downstream collection and treatment systems are completed."

6. On page 4-33, paragraph five, sentence two should read - "Slip lining involves pulling or pushing a ~~high density polyethylene~~ pipe liner into an existing sewer pipe. Sentence four should read - "~~Although less costly than replacement,~~ Rehabilitation of the three basins....." Sentence six which reads - "To date, 25 percent of NSD's sewers have been slip lined." should be stricken. 9.1

7. On page 4-33, paragraph six, sentence one should note that NSD is now providing rebates for toilets that use from 3.5 to 7 gallons per flush that are replaced with 1.6 gallon models.

8. On page 4-34, the last sentence of the first full paragraph should read - "Also, the total number..... which is less than the NSD estimate of ~~8,750 new residential service connections in this time frame~~ 8,400 equivalent dwelling units, of which approximately 6,100 would be residential units."

Draft Policy Document:

9. On page 4-11 under "Policies" - CS-9.3 should be revised to say - "The City shall use, or allow to be used, reclaimed water where feasible. 9.2

10. On page 4-12 under "Wastewater - Treatment Facilities", sentence three of paragraph one should read - "The Soscol Plant has a ~~design~~ hydraulic capacity of 15.4 million gallons per day. ~~with 1.54 million gallons per day of oxidation pond capacity presently reserved for American Canyon's wastewater.~~" Sentence three of paragraph two should read - "The plan also includes expenditures of $13 million for trunk lines and $2 million for ~~relief pumping stations~~ pump station expansion." 9.3

11. On page 4-12 under "Sludge Disposal and Water Reclamation", the first paragraph should be stricken and replaced with the following paragraph - "Dewatered sludge generated at the NSD's Imola Plant is either beneficially reused or disposed of at various landfill sites. Most of the sludge generated at the Soscol facility since 1966 has been stored in the plant's oxidation ponds. The District's Master Plan calls for removal of the accumulated sludge and future processing of sludge as it is generated." The last sentence of paragraph two should read - "From May through October, when discharge to the river is prohibited, ~~reclaimed water is used for irrigation~~ wastewater is stored in the 9.4

District's oxidation ponds for winter discharge, with a portion being reclaimed for irrigation. The first sentence in paragraph three should read - "Although water reclamation is not ~~always~~ cost effective,....." 9.5

12. On page 4-13, the last sentence in the first full paragraph should read - "The Stanly Ranch property ~~could also consider using reclaimed wastewater~~ will be required to use reclaimed water for landscape irrigation."

Draft Environmental Impact Report:

13. On page S-12 under "Water Supply" the second mitigation measure should be revised to say - "Use, or allow to be used, reclaimed water where feasible. (CS-9.3) 9.6

14. On page S-13 under "Wastewater Treatment, Storage, and Disposal" the level of significance under "Impacts" and "Level of Significance After Mitigation" should both be (S) - Significant. 9.7

15. On page 3.4-3, sentences two and four of paragraph one should be revised as stated in point 2 on page one of this letter. Also, sentence four of paragraph two beginning with "Pasture irrigation and the use....." should be stricken. 9.8

16. On page 3.4-4 under "Wastewater Treatment, Storage and Disposal" the existing statement should be deleted and replaced with - "Additional development will pose a significant impact on wastewater collection, treatment, and disposal, which impacts must be mitigated by constructing new, or rehabilitating existing, collection and treatment facilities, requiring indoor water conservation, and by expanding the water reclamation program." 9.9

17. On page 3.4-7 under "Wastewater Treatment, Storage, and Disposal" the end of paragraph one should note the impact of development accommodated by the Draft General Plan on NSD's facilities is (S) - Significant. The third sentence in paragraph two should read - "These problems have been addressed as part of the Soscol Plant ~~phase II~~ improvements .....". And, in paragraph four, sentences three and four beginning with "Because the NSD is implementing improvements....." should be deleted and replaced with - "NSD must continue with appropriate construction of proposed improvements, and monitoring and planning for the possible need for plant expansion, to mitigate the impact of development proposed in the General Plan." 9.10

18. On page 3.12-1 under "Hazardous Materials Storage, Usage, and Disposal in the City of Napa", sentence two of paragraph two needs to be deleted due to the fact the statement is no longer valid. Contact the Napa County 9.11

Department of Environmental Management for verification.

General comments on all documents:

9.12 19. The General Plan and Draft EIR need to note that Phase I of the treatment plant upgrade is nearing completion. This project involves construction of facilities that will allow the quality of water that the District produces for reclamation to be upgraded from Title 22 restricted use to unrestricted use, but does not increase the treatment capacity at the plant. In order for additional capacity to be available at the plant, subsequent plant upgrade projects will need to be constructed. Phase 2, which will increase the capacity of the plant in order to provide service to developments that are authorized by the City and County of Napa's General Plans, and are within the District's service area, is in the preliminary design stages and is currently being contemplated for approval by the District's Board. However, until the major improvements recommended in the Master Plan are completed, the District cannot guarantee that capacity will be available for future growth.

9.13 20. The General Plan and Draft EIR need to provide projections on the anticipated wastewater flow that will be generated as a result of development authorized by the General Plan. The calculations need to include storm water inflow and infiltration, as well as commensurate commercial and industrial growth. Additionally, the EIR needs to review what other development is likely to occur within NSD's boundaries or its Sphere of Influence that is outside of the scope of this General Plan. This would include development of the Napa Airport Industrial Area and the Silverado Country Club, portions of which are within the District's Boundaries and/or Sphere of Influence, and that the District will be called upon to serve.

9.14 21. At various places throughout the General Plan and EIR, it is noted that the Soscol Treatment Plant has a capacity of 15.4 million gallons per day. It needs to be noted that this is the nominal hydraulic capacity of the plant in its existing configuration, and that even though non wet weather flows are approximately 8 million gallons a day, the biological capacity is currently being exceeded during certain times of the year. This is evidenced by periodic odors emanating from the ponds and consistently low dissolved oxygen readings in the ponds. The existing system is at capacity. The contemplated Phase 2 project will add growth capacity for up to 10 years.

Additionally, as is noted in the documents, the District cannot discharge to the Napa River during the dry weather months of May thru October. This requires the District to use the ponds for storage during this period. Due to the fact that in recent years the ponds have reached their

9.14

storage limits, additional reclamation area will be required to directly offset the volume of waste per day that will be generated within the General Plan area. The City of Napa must be responsible for assisting the District in finding additional reclamation area.

22. In the General Plan, reference is made to the fact that the City of American Canyon may build their own treatment plant or ship their wastewater to Vallejo for treatment, which would result in them disconnecting from the District's Soscol Plant. It should be clearly noted that the City of American Canyon, at their discretion, has the option of remaining connected to the Soscol Treatment Plant upon purchasing the capacity they are utilizing in the treatment plant from the District. If the City of American Canyon chooses to remain connected to the District's facilities, additional upgrades to the Soscol Treatment Plant, beyond Phase 2 as outlined above, would be required. The cost of the required upgrades would be paid for with the fees collected from the City of American Canyon. It should be noted that the City Council of American Canyon has voted to disconnect from the District. However, the District has not received written notice from American Canyon of their intention to disconnect.

9.15

Furthermore, even if the City of American Canyon pursues wastewater treatment elsewhere, their disconnection from the District's treatment facilities will not substantially reduce the loading on the ponds. During critical times, their departure would reduce the loading on the ponds from 200% of capacity to 180% of capacity. The District's Master Plan projects must proceed to accommodate available capacity for future development within the General Plan area.

If you have any questions regarding these matters, or need any additional information, please feel free to contact me.

Sincerely,

John W. Stewart
Engineer-Manager

by: Todd Herrick
Engineering Technician

cc: NSD Board of Directors
L. Randolph Skidmore, Legal Counsel
Jeff Redding, County Planning

city-gp.res

10.

C
M
A

LaVerne Oyarzo
Chair

NAPA COUNTY
CONGESTION MANAGEMENT AGENCY

1195 Third Street Room 201, Napa, California 94559
Phone (707) 253-4351 Fax (707) 253-4627

GENERAL PLAN COMMUNICATION # 10

November 18, 1996



Deborah Faaborg
General Plan Project Manager
City of Napa Planning Department
P.O. Box 660
Napa, California 94559
FAX Transmitted to: 707.257.9522

Ms. Faaborg:

We have received and examined the draft General Plan documents for the City of Napa and have the following comments.

General Plan Draft Policy Document

1) Page 1-6, Table 1-2. Is the land-use shown in the Table what was used in the traffic modeling analysis? The document does not specify the land use scenario used in the traffic projection model. 10.1

2) Page 1-8, LU-1.6. The City designates several State Highway routes as scenic corridors. The City might wish to include in the requirements for these locations sufficient strictures to add them to the state Scenic Highways list. 10.2

3) Page 1-15, LU-4.C. In this and several other locations (T-1.8, T-1.B, T-1.C, and T-4.B for examples), the City either is investigating the imposition of new fees or outright calling for new fees or assessments. Considering the passage of Proposition 218, it might behoove the City to re-examine these. 10.3

4) Page 3-1, Introduction. The City should be complimented on this Introduction that clearly recognizes the mobility problems that all jurisdictions are facing. The impacts of decreasing mobility due to congestion and lack of operating and maintenance moneys are crucial to the livability of the state over the next several decades. 10.4

5) Figure 3-1. Please consider showing the remainder of Trancas and the portion of Silverado not on the State Route. Without these additions, the graphic is strangely incomplete and may be confusing. 10.5

6) Page 3-7, Table 3-3. State Route 29 is presently rated as a freeway by Caltrans from north of the intersection of 29/12/121 to one-quarter mile north of Lincoln. With the construction of the 29/Trancas 10.6

10.6

interchange, the designation will move to north of Trancas, but short of Trower. The freeway section will not move south of the 121/12/29 intersection to north of the 221/29 intersection as the Table states.

It is noteworthy that the City will have no major arterial servicing north-south movements west of SR 29.

10.7

7) Page 3-9, T-1.2. The city should be complimented for its willingness to assess projects for their impacts on the regional transportation system. Unfortunately the analysis of the impacts of growth in the City does not, in this document, extend but very little past the City's RUL. Without a more broad-ranging analysis, the actual full impact of the proposed GP are not possible to assess.

10.8

8) Page 3-11, Implementation Programs. Not all the projects shown in the environmental document on page 3.3-6 as included in the modeling effort in the "2020 with Roadway Improvements" are shown in the Implementation Program for the various routes. Please consider adding the missing projects. The "2020 with Roadway Improvments" indicate at least one project outside of the City. Does the City intend to contribute? How will the City insure that the project is completed?

10.9

9) Page 3-13, T-2.1. The Policy does not appear to speak to standards on the state system, but obviously exempts one state/local intersection from the standards. Does this imply that the standards apply to all such mixed intersections as well? Please consider clearly applying the same standard to the state routes in the City as this policy applies to the local streets.

10.10

10) Page 3-13, T-2.3. This Policy seems to state that both the intersections and the roadway segments connecting them should be examined for the levels of service when assessing the operation of the City's roadways. While the CMA certainly believes that this is the correct method for any assessment, the City's analysis of its own General Plan relies entirely on an examination and report of intersection LOS. The City's analysis should also examine the interconnecting segments.

10.11

11) Page 3-14, Crucial Corridors. Please consider segmenting the requirements for the Corridors to match with the Policy T-2.1 that lowers the standards of selected segments of some of the crucial corridors. It seems unlikely that the Policies for the Crucial Corridors should be the same in places where the City is acknowledging its inability to maintain a level of service that it desires as for locations where the standards can be maintained.

10.12

12) Page 3-14, Trancas Street. Please consider extending the limit of this corridor to Silverado (121).

10.13

13) Page 3-15, T-3.3 (c) (ii) and T-3.4 (b) (iii). Both of these and several others in this Corridor section state a requirement for more than minimum parking. We suggest that it should be rewritten to increase parking requirements in these locations to such a level that no project will need parking outside of the site at any time, or perhaps there will be no overflow parking required outside the site for all but a certain small percentage of the time.

10.14

14) Page 3-18, T-4A. Although the City overtly recognizes the problems that traffic calming has caused some jurisdictions (like Berkeley), it is nevertheless proposing to draft standards for such actions. We would submit that a well designed, multiply redundant street system backed by good traffic enforcement is the best traffic calming method available. Traffic calming standards can lead to an overall degradation in service, as the section acknowledges.

15) Page 3-19, T-5.5. We would like to compliment the City on the determination to explore transit consolidation as a possible benefit to the riding public. 10.15

Page 3-20, T-5.12 and T-5.13. These seem to constitute TDM measures. We would encourage the City to remove the conditional phraseology in both of these policies and to add an implementation program for these TDM measures to be included in City regulations.

16) Page 3-21, second paragraph, last line. The CMA Board adopted the Countywide Bicycle Plan on October 16, 1996. 10.16

17) Page 3-24, T-6.D and T-6.F. Please consider shortening the implementation time for both of these actions. The City currently has access to TDA Article 3 funds, approved for the 1995-96 FY, for both of these projects. 10.17

Background Report

1)Page 1-21, Scenic Corridors. As the City has designated SR 29 a Scenic Highway, perhaps the City would wish to take the necessary actions to have the state officially adopt the designation as well. 10.18

2) Page 1-29, Congestion Management Program. The CMP will not be a legislative requirement as of 1/1/97.

The CMA traffic projection model may have been used as a base for the traffic analyses completed by the City. However, the CMA has a policy that recognizes if the model is used for purposes other than an analysis conducted by the CMA or for the analysis of a project under the requirements of the CMP, that the model is not under their control and cannot be said to be the CMA model. 10.19

In addition, it is our belief, by the information presented in the Plan, that the LU utilized in the GP analysis is significantly different from the current 2020 data for the CMA. The housing units in the CMA database is 37,390, for example, while the City reports less on Table LU-3 for 2020. The model used for the analysis should not be purported to be the CMP model, as it is not identical in the LU and perhaps other particulars as well. Please remove the last line of the page as it appears to be incorrect.

3) Page 1-34, Table LU-3. Please clearly label the 2020 figures as projections from the City of Napa Planning Department. ABAG did not in Projections '94 or '96, go out to 2020. The Table now implies that the information is from ABAG. 10.20

4) Page 1-39, Commute Patterns. The statement that less than half of all traffic on City streets originates and ends within the City is most likely true, but the statement is incomplete. Does the calculation include the state routes within the City? Seemingly the City counts and then does not count the state routes dependent on the purpose. What is the average for all jurisdictions? The statement is true for nearly all cities. How many of these one-ended trips are by City residents? How many of these trips that are not made by City residents end up as a net benefit to the City (a home-shop trip for instance)? 10.21

As the City acknowledges that cross-commuting will increase, given the analysis completed for the General Plan. What does the plan do to eliminate or reduce the cross-commute?

Draft EIR

10.22 1) The City's analysis depends entirely on examination of intersections. We would like to know how well the segments operate, particularly when the City appears to be addressing several problem intersections by adding lanes at the intersection only. This is seemingly most peculiar at Soscol/Kansas where six short through lanes are planned but at Soscol/Imloa two blocks away and with greater volumes, four lanes are claimed to be sufficient.

10.23 2) Page 3.3-3, Table 3.3-2. The intersection of 221/29 was measured by the CMA in 1994 at LOS B. We would like to see the count data for the intersection that indicates the current LOS at F. It is curious that the City intends no mitigations for the effects of its Plan at 221/29 (although Policy T-1.2 states otherwise). In fact, the City's "2020 with Roadway Improvements" scenario actually makes 221/29 operate slightly worse than the no improvement scenario. It would seem at the very least the City's plans should do no harm.

The City's analysis ignores many important locations across the valley where its commuting or otherwise traveling public will have consequential impacts. The City should consider broadening its analysis to examine additional locations and mitigating its impacts. As, for example, the Plan appears to do for 121/Trancas.

10.24 3) Page 3.3-9, Item 2. We agree that the LU analysis completed for the Plan, interpolating the 2020 LU back to 2000, indicates to the CMA's satisfaction that a CMP analysis of the General Plan is not required.

Thank you for the opportunity to comment, if you have any questions, please call me at 253.4351.

Sincerely,

John Ponte
Manager

JP
cmp96/napgpcm.let

4

11.

THE CALIFORNIA NATIVE PLANT SOCIETY

DEDICATED TO THE PRESERVATION OF CALIFORNIA NATIVE FLORA

November 16, 1996

John Yost
Planning Director
City of Napa Planning Dept.
P.O.Box 660
Napa, CA 94559-0660

GENERAL PLAN COMMUNICATION #11



Re: CITY OF NAPA GENERAL PLAN; Draft Environmental Impact Report, October 7, 1996.

To begin with, I would like to state my personal appreciation for the goals set in the updated city General Plan. I believe the goal to maintain a permanent greenbelt of open space around the city is tantamount to preserving the identity of the city and preventing urban sprawl from consuming valuable natural resources. Perennial and seasonal wetlands have been reduced over 50% from historical acreages, oak woodlands are being cut at an alarming rate for fuel wood and urban development and grasslands which have been reduced by over 90% in Napa Valley by agricultural and urban development.

The question is, are the goals set out by this document likely to be met by the proposed alternative particularly as they relate to natural resources? As stated, the impetus for this update was to prevent excessive growth permitted under the 1982 plan. The suggested project alternative will add 440 acres to the city. How does this reduce the growth rate? Where will the county satisfy its growth mandate if these parcels are annexed. This action will put greater growth pressure on remote areas of the county. 11.1

It is my recollection that the people of Napa voted in the late 1970's to cap the population within the city to 75,000. Why is this fact not discussed relative to the proposed project in this document. In Table 2-3 and 2-4, it is stated that the projected "build out" of dwellings will be 34,938 units with a population of 81,000 persons. This exceeds the public wish by 11,000 persons. What is more, my calculator tells me that 34,938 units with an average of 2.55 persons per household means Napa will reach a population of 89,092 by the year 2020. This exceeds the plebiscite by over 19,000 persons or 27%. This raises the question: does the analysis of traffic, noise, pollution, natural resource impacts, etc. take this into account or all projections based on 81,000. 11.2

Will the plan, as stated on page 4-5, serve to "minimize the disturbance of native grasslands, wetlands ...". The document does not present an estimate of area, or state the nature of additional parks and open space that will be retained after 7,840 dwellings are built and 963 acres of commercial space are developed. 11.3

11.4 This plan will open the door for development of 600 dwelling units on the Stanly Ranch. Of the 2,000 + acres, 60-70% of the areas is diked historic marsh. This occurs both north and south of Horseshoe Bend. Enhancement of this resource would be to restore tidal action in this area. This historic marshland and associated seasonal wetlands essentially isolate any potential development from the city of Napa. Development here would not conform to the goal of maintaining a permanent greenbelt or confining the urban limits. This area would juxtapose urban residential to county commercial. The construction of urban infrastructure would make this a satellite community disjunct from the city proper. This area should be excluded from development to preserve the scenic entry into Napa which "leaves a lasting impression on residents and visitors" (page 2-10) and to insure the protection of valuable wetlands.

11.5 This document states on 3.6-3 that the "city would promote riverfront development" while also recognizing that riparian vegetation has been severely reduced by past and existing development. It would be in keeping with the goals of this project that riverfront development be limited and that scenic and biological values of the river be enhanced by restoring the riparian gallery where possible.

11.6 "Vernal pool complexes occur north of Green Island Road" (3.7-2). There are also scattered vernal pools within the remaining grasslands of the Big Ranch Road area and Foster Road area. These are muted in expression by current land uses but the hydrologic features remain. The importance of these, although not harboring rare species, can be demonstrated by the fact that all historic vernal pools have been extirpated between Napa and Calistoga due to agricultural and commercial development. Some means of protection should be determined at this time in keeping with Natural Resource Goal NR-1 and NR-2 (page 2-8).

11.7 As described on 3.7-2 much of the remaining grasslands within the RUL are dominated by non-native grasses and forbs. The report further recognizes the importance of retaining some grasslands, chaparral and woodlands to prevent erosion and preserve the scenic qualities. It does not state the importance of preserving wildflower fields for similar reasons. This community is recognized as rare within the DFG's Preliminary Descriptions of the *Terrestrial Natural Plant Communities of California* (Holland, 1986). This community is represented in the Foster Road area. If this area is annexed, then a mitigation bank should be set up to preserve the few remaining acres of this plant community in the Napa area.

11.8 The list of sensitive plant species in the Napa area listed on page 3.7-3 and 3.7-4 are incomplete. Mason's Lilaeopsis is known to occur in 22 locations along the Napa River. In addition to rotting pilings as stated on page 3.7-3 it also occurs on intertidal banks. In fact this is the most common habitat utilized by this species along the river. Contra Costa goldfields may have historically occured within the RUL of Napa but no precise record of such occurrence exists. Collection labels likely describe a population on Richland property outside of the RUL. A historic population on Silverado Trail north of Napa most likely has been extirpated although CNDDB records do not recognize this fact. Vineyard development destroyed the last remaining potential habitat there around 1980. The only known population of dwarf downingia in Napa was extirpated by industrial park development in south Napa in 1982. A population of alkali milkvetch (*Astragalus tener var. tener)* was also extirpated at the Bedford IP at this time. This species is currently considered rare and endangered. Reports of Calistoga ceanothus in the Napa

area are erroneous as this was a misidentification of holly-leaf ceanothus (*Ceanothus purpureus*) a similar species. There is no historic record of Brewer's dwarf flax in the Suscol Creek area (CNPS INVENTORY, Fifth Edition, 1994). However, there is a record of Legenere (*Legenere limosa*) there. This species is considered rare and endangered by CNPS. Lastly, a population of San Joaquin spearscale (*Atriplex joaquiniana*) was found near the south end of Napa in 1991. This species is a candidate for federal listing. Approval of further development with in the RUL should consider impacts to these sensitive species and recognize that populations of these species may occur at other locations containing the required habitat. These species need to be recorded on environmental sensitivity maps maintained by the city (3.7-7) and surveys should be required in areas where appropriate habitat exists.

11.E

Sincerely,

Jake Ruygt

Jake Ruygt
Conservation Chairman
Napa Valley Chapter, CNPS

cc: John Pitt
David Magney

12.

NAPA COUNTY

CONSERVATION, DEVELOPMENT and
PLANNING DEPARTMENT

Jeffrey Redding
Director

1195 Third Street, Room 210 • Napa, CA 94559-3092
Telephone 707/253-4416 FAX 707/253-4336

GENERAL PLAN COMMUNICATION
12



November 15, 1996

John Yost, Planning Director
City of Napa, Planning Department
1600 First Street
Napa, California 94559-0660

Re: City of Napa General Plan--Draft Policy Document and EIR

Dear John:

The Department of Conservation, Development and Planning has had a opportunity to review the City's Draft General Plan Policy Document, dated August 16, 1996, and offers the following comments.

Rural Urban Limit (RUL)

The draft document notes that "This General Plan emphasizes Napa's commitment to containing urban development within the Rural Urban Limit (RUL)." However, Figure 1-1 indicates that in fact the City intends to expand the RUL. While the draft document is not specific on how much unincorporated land will be added to the RUL, the EIR prepared for the draft document states it clearly on page 3.2-5. The City intends to expand the present RUL by approximately 440 acres!

This Department is very concerned about what we perceive to be a major policy change to the city's planning program; i.e., the expansion of the RUL. We are particularly concerned, as we expressed by letter dated March 15, 1994 (see attached), that a the 40 acre parcel that is be included in the City's RUL is zoned Agricultural Preserve. If the city is now establishing a new policy to urbanize designated agricultural land, this is a significant change in city policy. What will prevent additional or wholesale inclusion of similar lands in the future? This action by the city is clearly growth inducing and is not adequately evaluated by the city as part of the accompanying EIR. The city's draft document should be amended to include the discussion of the RUL expansions in the manner in which it is discussed in the EIR sot that the public clearly is aware of the city's intention.

12.1

Inclusion of land referred to as state property, southeast of Imola Avenue and Soscol Avenue is also of concern to this office. The County has a limited supply of land that is designated for urban uses. And, as you know, Measure J limits county options to

12.2

12.2

develop uses within designated agricultural areas. Measure J was approved by 63% of city voters. If the county is to address jobs/housing balance issues that the city has raised relative to the updated Airport Industrial Area Specific Plan, use of designated urban lands for future housing throughout the County must be actively evaluated. The city's intent to incorporate this urban area into its RUL may reduce future options for the county and could adversely affect County policy options to address jobs and housing balance.

Land Use and Transportation

12.3

The draft document does not address in a comprehensive way development at the Stanly Ranch. Although the document notes that the Stanly Ranch property is the largest piece of undeveloped land in the City (page 1-7), the impacts on the city's road network associated with its development are ignored. For example, no improvements to the city's circulation system (figure 3-1, Table 3-1) are planned in the vicinity of the Stanly Ranch even though on page 1-7, the draft document outlines considerable development is contemplated. It seems reasonable that a development of 550 homes and 300 short-term lodging units that will generate upwards of 7000 daily vehicle trips would necessitate some future road or intersection improvement. The conclusion that is reached on page 3-13 of the draft document that ". . . an inability to significantly expand road capacity, and growth-mean that congestion is likely to increase over time." should be paralleled in the EIR. The inescapable conclusion is that traffic impacts are significant, unavoidable impacts that cannot be mitigated to levels of insignificance rather than as is concluded on page S-4 and Table S-1 that "there are no significant unavoidable impacts anticipated from adoption and implementation of the Napa General Plan."

12.4

The draft policy document should also include some implementation program for funding of the proportionate share of regional and city trips that impact roads and intersections outside of the city limits. Many vehicles that travel through intersections and on roads in the county area bound for the city. A commitment by the city to funds its proportionate share of these needed improvements should be included ion Implementation Measure T-1.C.

12.5

When the traffic section and conclusions reached in the EIR have been revised to address these comments, the document would assess the implications on local and regional air quality to ensure that the section on air quality reflects conclusions reached by the EIR on traffic and congestion.

Housing

12.6

The Department commends the City on its program to adopt an inclusionary zoning or in-lieu fee program. We hope that it will do so as soon as possible. In addition, the department would like to urge the city to include in its implementation program on housing a goal of cooperating with the County on the implementation of AB 3456

which enables jurisdictions in Napa County to share housing credits when they share in the development of new affordable housing units. The addition of a general policy statement reflecting joint cooperation between the city and county to provide for affordable housing opportunities within lands subject to city jurisdiction would also be appropriate. 12.6

Water

The EIR prepared for the General Plan is inadequate in its discussion of water since the EIR does not analyze the availability of water to serve projects that could reasonably be constructed within the documents planning horizon (i.e. 1996-2020). The August 16, 1996 draft policy document notes on page 4-11, ". . . the City will have sufficient water supplies to meet projected water demands **by** [emphasis added] the year 2012. . .". Given this short term shortfall in water supply, and, the foreseeable development of the Big Ranch Road project area the potential development at the Stanly Ranch, the conclusion of the EIR (Table s-1) that water impacts are insignificant is not borne out by the discussions found in the EIR. Without a firm source of water for the interval 1996-2012, we disagree that the impacts associated with water serve is insignificant. In addition, page 4-11 notes, "The City's water distribution system also has insufficient short-term storage capability to address current and projected needs." This, too, represents a significant impact that requires mitigation. Yet Table S-1 does not even identify this impact. 12.7

Thank you fro this opportunity to comment. Based upon these comments on the EIR and draft document, we expect that revisions will be made to the EIR and that it will be recirculated. We hoe that you will also recommend changes to the draft document to reflect our concerns relating to the RUL, Land Use, Housing, Transportation, and Water.

Please call me if I may be of further assistance or can clarify the comment in this letter.

Sincerely,

Jeffrey Redding
Director

cc: Board of Supervisors
Jay Hull, County Administrator
Robert Westmeyer, County Counsel

NAPA COUNTY

BOARD OF SUPERVISORS

1195 THIRD STREET, ROOM 310 • NAPA, CALIFORNIA 94559-3082
BOARD OFFICES 707/253-4386 FAX 707/253-4176
CLERK OF THE BOARD 707/253-4580

MARY JEAN MCLAUGHLIN
Clerk of the Board

RECEIVED
MAR 2 4 1994
NAPA CO. CONSERVATION
DEVELOPMENT & PLANNING DEPT.

March 15, 1994

Ed Solomon, Mayor
City of Napa
955 School Street
Napa, California 94559

Re: City of Napa Preferred Land Use Alternative

Dear Mayor Solomon:

We received a copy of the draft Preferred Land Use Alternative that is under consideration as part of the City's General Plan update. After reviewing the document, we discovered that the City Council had directed staff to include four properties within the Land Use Alternative which are not currently within the RUL. Two of these properties, The Napa State Hospital and a site on the northeast corner of Big Ranch Road and Trancas Avenue, have potential implications for the County's long range planning program. I am sending you this letter at the direction of the Napa County Board of Supervisors to advise you of some concerns that the County has regarding expansion of the RUL to encompass these two properties.

As you know, the County has been actively participating in a joint committee with representatives of other County cities to study ways to better address long term jobs and housing growth in the County. One conclusion that has become clear as a result of these discussions is that all jurisdictions need to maximize development of housing, particularly affordable housing, on appropriate lands within their jurisdictions. The County in particular must focus its attention on lands currently designated or potentially suitable for urban uses. This requirement to concentrate urban uses, such as housing, within urban areas derives directly from two voter adopted initiatives, Measures 'A' and 'J" which required the County to adopt an annual limitation on permits (Measure 'A') and prohibited the conversion of agricultural lands to urban uses without a vote of the people. These initiatives, binding as they are on County land use decision-makers, were approved by 51% of City voters in the case of Measure 'A' and 63% of City voters in the case of Measure 'J'. The interests of City residents vis a vis County land use policies were made clear by these votes. We think that these two votes also indicate direction to the City Council to limit annexation of County lands designated or potentially suitable for urban uses.

VINCE FERRIOLE District 1
FRED L. NEGRI District 2
MEL VARRELMAN District 3
PAUL BATTISTI District 4
MIKE RIPPEY District 5

Att. 2nd 3/17

We are concerned about the continuing loss of County lands suitable or potentially suitable for urban uses through annexation to adjoining Cities. Incorporation of the City of American Canyon removed lands that had long been designated for housing from County jurisdiction. These lands were intended to provide a portion of County housing needed from jobs generated in the airport area. Although the lands available for housing were reduced by virtue of incorporation, State requirements for the County to plan for the housing does not diminish with incorporation.

The same issue may arise with potential expansion of the RUL to include the Napa State Hospital and lands adjacent to the Big Ranch Road/Trancas intersection. Although certainly within the City's Sphere of Influence, these lands represent lands potentially suitable for County housing opportunities either by virtue of their designation or proximity to existing urban uses and services or both. Inclusion of these lands within the RUL signals the City's intent to annex them in the future. Removal of such lands through annexation will only serve to further reduce the County's ability and options to meet its housing requirements established by the State of California. For these reasons, we strongly urge the City Council not to expand the RUL to include the two mentioned properties.

Sincerely,

Fred Negri, Chairman
Napa County Board of Supervisors

cc: City Council Members

13.

NAPA COUNTY

OFFICE OF COUNTY COUNSEL

1195 THIRD STREET, ROOM 301, NAPA, CALIFORNIA 94559
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ROBERT WESTMEYER, County Counsel

MARGARET L. WOODBURY, Chief Deputy
JOSEPH C. FOLKARD, Deputy
JAYNE F. HERMAN, Deputy
KEVIN C. STOBAUGH, Deputy
KELLY MORTON, Deputy
LAURA C. SPEEGLE, Deputy

GENERAL PLAN COMMUNICATION # 13

November 18, 1996

Our File Nos. 7700.071



John Yost, Planning Director
Attn: Deborah Faaborg, General Plan Project Coordinator
1600 First Street
Napa, CA 94559

Re: *Comments of the County of Napa: City of Napa General Plan and EIR*

Dear Mr. Yost:

You will find enclosed the comments of the County of Napa regarding the draft EIR the City of Napa prepared in conjunction with its proposed General Plan update. As you will see from the comments, the County believes that the Draft EIR and accompanying documents are inadequate primarily because they fail to evaluate the regional impacts of the proposed changes to the City of Napa's General Plan and constitute dramatic changes in the communities land use policies. The County believes that in the areas discussed the draft EIR is so inadequate that a new draft EIR will need to be prepared and re–circulated. 13.1

The County appreciates the opportunity to comment on this very important document which has major adverse implications for the long standing City/County cooperative land use effort.

Very truly yours,

ROBERT WESTMEYER
County Counsel

JEFFREY REDDING
Director, Conservation, Development and Planning

cc\d\pl\aiasp\yost3.doc

COMMENTS OF THE COUNTY OF NAPA:

CITY OF NAPA GENERAL PLAN UPDATE

DRAFT ENVIRONMENTAL IMPACT REPORT

The County of Napa submits the following comments regarding the draft Environmental Impact Report (hereafter "DEIR") relating to the General Plan Update of the City of Napa. The Director of the Conservation, Development and Planning Department will be filing separate comments regarding the planning implications of the proposed changes to the City's General Plan. In addition to these comments, the County reserves the right to file additional comments regarding the merits, or lack thereof, of the General Plan update as the hearings on same progress.

I. SUMMARY.

The City of Napa has proposed amending its General Plan and has prepared a DEIR for the purpose of evaluating the environmental effects that would logically flow from the amended General Plan. Unfortunately, the DEIR the City has prepared is inadequate in a number of respects and as a consequence fails to properly evaluate the environmental effects of the proposed General Plan Amendments.

The major shortcomings of the DEIR include the following:

1. **FAILURE TO ADEQUATELY DISCUSS THE REGIONAL SETTING OF THE PROJECT.** The California Environmental Quality Act (hereafter "CEQA") requires a DEIR to describe not only the local setting of the project but also the regional setting in which the project is located. The failure of the DEIR to adequately describe the regional setting of the project renders it inadequate as a matter of law. 13.2

2. **THE DEIR FAILS TO RECOGNIZE /EVALUATE THE REGIONAL EFFECTS THE PROJECT WILL CAUSE.** An EIR cannot be considered adequate if it fails to evaluate the effect development within the City will have on the region. The evaluation of the regional effects the General Plan Amendments will have, particularly in the areas of air quality, water supply, wastewater treatment and traffic, is inadequate. 13.3

3. **THE DEIR'S TRAFFIC ANALYSIS IS INADEQUATE.** The DEIR failed to include in its traffic computations the increased traffic that will be caused by a build out of the South Napa Marketplace Shopping Center and the development of the Lucky Supermarket at Lincoln Avenue. No direct discussion of the impact the Stanly Ranch development will have on the immediately adjacent intersection is included. Additionally, the City's reliance on the ABAG 96 projections is inappropriate since those projections end in the year 2015 and the draft General Plan is intended to project through the year 2020. 13.4

4. **THE DEIR'S CONCLUSION THAT ALL TRAFFIC IMPACTS HAVE BEEN MITIGATED TO AN INSIGNIFICANT LEVEL IS INCONSISTENT WITH THE ANALYSIS CONTAINED IN THE DEIR.** The DEIR identifies a number of traffic intersections where it concedes the 13.5

13.5

traffic will continue to operate at LOS F, which the DEIR defines as a significant effect, while at the same time concluding that all traffic has been mitigated to an insignificant degree. The DEIR needs to be redrafted to resolve this inconsistency.

13.6

6. <u>THE CUMULATIVE ENVIRONMENTAL EFFECTS OF REASONABLY FORESEEABLE DEVELOPMENTS ARE NOT ANALYZED.</u> The proposed General Plan changes the designation of the Stanly Ranch from a "Special Studies Zone" to intense residential development. It accommodates the creation of 600 new homes (1,400 residents) as well as a resort hotel and various other traffic generating commercial facilities. Yet there is no meaningful discussion of the impact such a development would cause anywhere in the DEIR. Nor is there a discussion of other pending and reasonably foreseeable projects such as the specific developments occuring within the Airport Industrial Area, the Lucky Supermarket or the development of the remainder of the South Napa Marketplace Shopping Center.

13.7

5. <u>GROWTH INDUCEMENT.</u> The proposed amendments of the General Plan would accommodate the development of the Stanly Ranch as well as agricultural property east of Big Ranch Road. Both of these changes are growth inducing and yet there is no analysis of the growth inducing implications the buildout of these developments will have on the existing environment or long standing County General Plan policies that protect agriculture and open space.

13.8

6. <u>*CONFLICTS WITH ADOPTED ENVIRONMENTAL PLANS AND GOALS.*</u>

The City of Napa is proposing for the first time to bring within its Sphere of Influence (hereafter "SOI") and Rural Urban Limit Line (hereafter "RUL") of the City agricultural lands that are presently located within the Agricultural Preserve. Although the amount of lands being so included is small in comparison to the amount of land already within the City of Napa's SOI, the implications of this change are huge for the County's agricultural community, represents a radical shift in the policy of the City, and is inconsistent with the fundamental Goals and Policies of the Napa County General Plan. The fact that there is no environmental analysis of this issue, as there must be, renders the DEIR inadequate as a matter of law.

13.9

The City of Napa has conceded in its draft documents that the long standing practice of the City of Napa is to provide housing for individuals that wish to live in southern Napa County, including housing for workers in the unincorporated area. In its comments regarding the County of Napa's proposed amendments to the Airport Industrial Area Specific Plan (hereafter

"AIASP") the City has indicated it may no longer be willing to provide such housing in the future. Such a result may require the county to provide additional housing in the those areas of the county presently designated as urban and adjacent to the Cities of Napa and American Canyon as a result of its development of the AIASP. If additional housing is required, this necessarily will eliminate the open space nature of those lands and constitute a major change to the adopted environmental plans and goals of the City and County of Napa that have been in place for many years. If the City's comments regarding the AIASP amendments represents the City's new policy in this regard, it represents a significant environmental effect. In such a case, the proposed General Plan should reflect this change and the environmental effects of such a change must be analyzed. 13.9

7. ALTERNATIVES ANALYSIS. There is a lack of alternatives included in the DEIR. Specifically, there is no alternative proposed that contemplates not bringing the lands designated as AW/AP on the Napa County General Plan within the City's Sphere of Influence. Nor, as LAFCO has suggested, has the alternative of de–annexing the Stanly Ranch been considered even though the Ranch is not currently within LAFCO's adopted Sphere of Influence of the City of Napa. These are reasonable alternatives to the proposal which must be included in the alternatives analysis. Until they are the DEIR is inadquate as a matter of law. 13.10

II. DETAILED DISCUSSION OF THE DEIR INADEQUACIES

A. PROJECT DESCRIPTION.

CEQA requires that a DEIR include a project description that adequately describes the environment in the vicinity of the project as it exists prior to the commencement of the project from both a local and regional perspective. The description must enable an individual who reads the DEIR to be able to understand the significant effects of the proposed project on not only the locality but also on the region. 14 Cal.Adm.Code 151125. In this regard the DEIR is deficient. 13.11

Table 1–1 of the DEIR indicates that the regional setting description is contained the Draft General Plan document (Chapter 1: 'Napa General Plan Context' & 'Environmental Constraints') and in the Background Report. The 'Napa General Plan Context' discussion amounts to a brief historical discussion of job projections in the region. The regional environmental setting is ignored. The "Environmental Constraints" discussion is even worse. It contains not a scintilla of discussion of

regional issues despite the reference in the Draft EIR to that portion of the draft General Plan. Finally, the Background Report contains no meaningful discussion of the existing regional environmental setting particularly in regard to the regions present lack of sewage capacity, water availability in the near term, and the existing traffic situation. The DEIR reference to the Background Report also fails to identify precisely where in the Background Report regional issues are discussed. Such references are mandatory if a DEIR is to be deemed adequate. See 14 Cal.Adm. Code 15122.

13.11

B. REGIONAL EFFECTS NOT ADDRESSED OR INADEQUATELY ANALYZED.

1. TRAFFIC

The County is concerned about the enormous traffic impacts of the developments that will be accommodated by the draft General Plan, particularly the traffic impacts caused by the Stanly Ranch and Big Ranch Road developments and the failure of the City of Napa to address at all the impact those developments will have on the SR29/12 intersection. The County is also concerned that although the City's traffic study included the SR29/221 and SR29/121 intersections no mitigation measures, including but not limited to roadway construction, were proposed for the SR29/221 intersection.[1]

13.12

The City's view, evident throughout the draft documents, is that its responsibility ends at the City limits. Such an approach violates the CEQA which requires a local agency to carefully review the regional impacts its projects will have and either provide a reasonable level of mitigation or concede that a significant environmental effect remains, no mitigation measures are feasible that would further reduce the impact, and adopt overriding findings.

The proposed changes to the City of Napa's General Plan contemplates including 440± acres within the City's Rural Urban Limit Line (hereafter "RUL"). 53 of those acres represent agricultural lands that have not previously been within the City's Sphere of Influence (hereafter "SOI"). It also will authorize extensive development in

[1] No mitigation was proposed for SR29/12 either since that particular intersection was not studied at all.

the Big Ranch Road area and the Stanly Ranch area. In the Big Ranch Road area an unspecified number of additional homes are expected to be built. In the Stanly Ranch planning area the development involves 550–600 new residential units, a destination resort comprising 300 lodging units, with conference, meeting room and related facilities, an 18–hole golf course and clubhouse, a commercial wine center, a small winery and a boat dock providing public access to the Napa River. When development in other areas of the City are taken into account the proposed changes to the City of Napa's General Plan contemplates developing a grand total of 7,840 new homes.

Such changes will clearly have an adverse effect on traffic, not only within the City of Napa, but also on the various State Highways leading to the City of Napa. Despite this fact, the DEIR contains only a superficial discussion of the regional impact such development would cause on most State Highways and provides no analysis of the effect such development would have on the SR29/12 intersection. That a DEIR to be adequate is required to analyze the effect a project will have on major highways within a reasonable distance of the project is clear. *A Local & Regional Monitor v. City of Los Angeles* (1993) 12 Cal.App.4th 1773, 1785.

13.12

Although there is no analysis performed by the City evaluating the impacts this scope of development would have on SR29/12 some rough estimates can be made. For example, since 40% of the individuals occupying those 7,840 homes will commute to out of county jobs[2] these changes to the General Plan will result in the PM Peak trips increasing by approximately 3,000 trips per day. The resort hotel, golf course and Boat Dock presumably would add several thousand additional PM peak trips per day.[3] The current LOS for the SR29/121, SR29/221 and SR29/12 intersections has been estimated by the Congestion Management Agency as LOS D.

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[2] The Background Report (at p. 1–38) indicates that in excess of 40% of city workers commute to out of county jobs. Clearly the majority of these individuals will commute south thereby impacting SR29/121, SR29/221 and SR29/12 intersections.

[3] The Final EIR involving the Gasser Estate Project projected that the Napa Resort Hotel would have generated approximately 4,673 total trips per day (Page 5–15). Although the DEIR needs to analyze the Stanly Ranch Resort Hotel situation and is inadequate for not having done so, it is assumed the trip generations by any resort hotel would be similar.

Although the DEIR fails to analyze the situation, is seems likely that these additional PM peak trips per day will cause the LOS to degrade to F. Thus, it seems likely that when the development authorized by the proposed amendments to the General Plan of the City of Napa are accomplished the traffic will revert to LOS F solely as a result of City development. The recent study performed by Dowling & Associates for the AIASP validates this conclusion. That study indicates that SR29/121, SR29/221 and SR29/12 intersections are already at LOS E or F.[4] Thus, under either analysis, the additional development proposed by the City of Napa in its revised General Plan will significantly aggravate an already unacceptable LOS.

13.12

In sum, all of these developments will significantly impact the regional traffic patterns in the Airport Industrial Area. The DEIR is inadequate as a matter of law for failing to discuss this environmental impact and doubly inadequate for failing to propose feasible mitigation measures. The DEIR needs to be revised and recirculated with specific mitigation measures included that will commit the City of Napa to provide its fair share of the costs of improvements necessitated by its development.

Finally, it seems clear from a review of the various documents relating to the DEIR that incorrect traffic projections were utilized in two areas. First, the ABAG projections that were used were not sufficient in that those projections only reach the year 2015 (or 2010 if the 1994 ABAG projections are utilized). Second, the Background Report indicates that the City Base data used for the CMP Model was the same data used by the City of Napa in making its traffic projections in the General Plan (at page 1–29). In discussing this matter with John Ponte of the CMA he advised that the CMP Model 2000 did not include data relating to the buildout of the South Napa Market Place Development nor the development of a Lucky Superstore at Lincoln Avenue and State Highway 29. This is significant since the Final EIR on the Gasser project clearly indicates that, upon buildout the LOS would drop to LOS E and LOS F at most locations (See Table 5–1 of the Gasser Estate Project Final EIR). An EIR, of course, that does not contain sufficient information or, as seems to be the case here, is based on erroneous information, must be withdrawn, rewritten and recirculated. In short, these

13.13

[4] Appendix B: Traffic Calculations; SR29/121 (LOS E) , SR29/221 (LOS F) and SR29/12 (LOS F)

errors not only impact the regional issues previously discussed but also call into question the validity of the entire environmental analysis of transportation on both a local and regional level. 13.13

B. SEWAGE.

The County's traffic comments are equally applicable in the case of sewage. The County is concerned that the Stanly Ranch and Big Ranch Road developments in particular will have a major impact on the ability of the Napa Sanitation District (hereafter "NSD") to provide adequate levels of service to the Airport Industrial Area and yet there is no analysis of this issue anywhere in the DEIR or accompanying documents. The comments of the NSD regarding the DEIR concur with this view. The City's view again seems to be that its responsibility to environmentally assess its projects ends at the City limits. Such an approach violates the CEQA which requires a local agency to review the extra–territorial impacts its projects will have and provide a reasonable level of mitigation. This is particularly important in a DEIR that evaluates the impacts of a policy level documents such as is here involved. 13.14

The DEIR needs to be rewritten to discuss in detail the existing sewage capacity of the NSD, if any. It also needs to evaluate whether or not Phase II of the Sewage Treatment Master Plan is feasible. Areas of discussion should include, but not be limited to the following: 13.15

1. Whether the existing revenue stream of the NSD is capable of financing the Phase II Sewage Treatment Master Plan;

2. Whether the existing revenue stream of the NSD is capable of financing the Phase III Sewage Treatment Master Plan since Phase II will only permit the NSD to serve through the year 2012;

3. The effect the passage of Proposition 218 will have on the ability of the NSD to finance Phase II/III improvements to the extent the existing revenue stream will not support financing the improvements.

Finally, the DEIR's discussion of proposed mitigation is inadequate. It is not sufficient to simply state that "The NSD's 1990 Wastewater Master Plan recommends improvements to address future wastewater treatment and disposal needs for the City" 13.16

13.16

and that "The NSD has begun to implement phases of the Master Plan designed to ensure that the district will be able to meet the City's projected demands." An analysis that discusses the projected development, the daily wastewater flow and the data upon which those figures were based is required. Following that analysis, how those demands will be met needs to be discussed. This inadequate environmental analysis also affects the cumulative impact analysis as will be discussed more fully below.

C. CUMULATIVE IMPACTS.

The cumulative impact analysis fails to comply with §15130 of the CEQA State Guidelines. Failing in this, the DEIR's analysis of cumulative impacts is inadequate as a matter of law. *San Franciscans For Reasonable Growth v. City and County of San* Francisco (1984) 151 Cal.App.3d 61. Further what little analysis that exists is overly abstract. There is no meaningful discussion of the impacts reasonably foreseeable future projects in the City of Napa such as the Stanly Ranch and Big Ranch Road developments will have. Nor is there any discussion whatsoever of projects that are presently occurring within the AIASP area even though the City of Napa was fully aware of such projects.[5] Such failure, as the City of Napa has phrased it in its comments on the DEIR involving the AIASP, "renders the impact analysis invalid, abstract and shrouds the concrete impacts the development within the City will actually cause." Relying on abstract and high conceptual reports, such as ABAG reports, as justification that further cumulative impact analysis is not required is insufficient as a matter of law.

13.17

D. THE DEIR ANALYSIS DOES NOT SUPPORT ITS CONCLUSIONS.

13.18

In a number of instances although the DEIR analysis identifies significant unmitigated environmental impacts, the conclusion is reached that all impacts are

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[5] In its comments to the DEIR involving the AIASP the City argued that there were numerous projects that allegedly were not adequately analyzed including the WIG Resort Hotel and the Windmill Inns of America project. The City cannot argue that the County DEIR should address these projects but the City DEIR is not required to do so.

reduced to a level of insignificance. In the case of a DEIR, of course, conclusions that are unsupported by the evidence cannot stand.

For example, the DEIR concedes that in some locations the Level of Service will remain at LOS F even after the imposition of mitigation measures (SR29/Trancas). In other areas a LOS F is identified and no mitigation measures of any kind are proposed (SR29/221). In still other areas, as has been previously discussed, the LOS is not even analyzed (SR29/12) despite the fact that the proposed General Plan will accommodate development that will have a significant effect on that intersection. LOS F, in turn, is defined by the DEIR as constituting a signficant effect on the environment. 13.18

In other areas the intersection is defined as LOS F (Sierra Avenue) and it is summarily concluded that a single instance is not considered a significant effect. This might be true except for the fact that the Circulation Element then proposes rerouting large portions of the traffic from the Big Ranch Road development to Sierra Avenue rather than to the signalized intersections at Trower Avenue and Trancas Avenue. Additionally, the DEIR's mitigation measure for SR29/Trancas involves closing Sierra Avenue to SR29 access and there is no discussion regarding the manner in which the Big Ranch Road traffic bound for SR29 will be dealt with once the SR29/Transcas mitigation measure is implemented.

This type of analysis, which occurs throughout the DEIR does not support a conclusion that all significant effects have been mitigated.

Similarly, in the case of wastewater, the DEIR concludes there will be no significant impact even though no mitigation measures are proferred. 13.19

E. GROWTH INDUCEMENT.

The DEIR fails to recognize the growth inducing aspects of the proposed draft General Plan. The Stanly Ranch is presently serviced with no sewage infrastructure and minimal infrastructure providing a water supply to the area. The growth inducement aspects of providing the needed infrastructure is not discussed anywhere in the DEIR or accompanying documents. More importantly, the development of the Stanly Ranch will result in the virtual enclosure of 800±a acres or agricultural/open 13.21

space lands. The pressure to develop this property would be enormous. Additionally, the pressure to urbanize additional lands outside this 800± acres but which are immediately to the north of the Stanly Ranch would also be intense.

In the Big Ranch Road area, the draft General Plan proposes for the first time to include within its Sphere of Influence lands on the east side of Big Ranch Road. Big Ranch Road has always been considered an agricultural "dividing line" identifying the City limits. Once this line is breached the pressure to increase the City Limits to the Napa River will be intense. Only in this case the acreage that will be subjected to development pressures involves thousands rather than hundreds of acres.

13.20

The failure of the DEIR to discuss the growth inducing aspects of these matters renders the DEIR inadequate as a matter of law. This is particularly the case in a policy documents such as the General Plan where growth inducement is always a serious and significant factor. The inadequacy of this element of the DEIR requires that it be withdrawn, redrafted and recirculated.

E. ***CONFLICTS WITH ADOPTED ENVIRONMENTAL PLANS AND GOALS.***

Appendix G of the State Environmental Guidelines provides that a project will normally have a significant effect on the environment if it will conflict with adopted environmental plans and goals of the community in which it is located. The Napa County General Plan has long provided that agricultural lands should be protected and not urbanized. Thus Goal #1 of the Napa County General Plan provides that the purpose of the general plan is to plan for agriculture and related activities as the primary land uses in Napa County and concentrate urban uses in the County's existing cities and urban areas. Goal #6 provides that the General Plan is intended to ensure the long term protection and integrity of those areas identified in the general plan as agriculture and open space. The County and the City have adopted general plan policies supporting this concept.

13.21

The proposed draft General Plan, on the other hand, now proposed to begin the process of ultimately annexing agricultural lands into the City of Napa which clearly conflicts with the above adopted environmental plans and goals of both jurisdictions.

This by definition amounts to a significant environmental effect which has not been discussed or mitigated. The DEIR needs to be revised to identify this change by the City as a significant environmental effect and propose feasible mitigation measures to deal with the effect.

Similarly, the City of Napa in its comments regarding the DEIR that has been prepared for the AIASP has indicated it may be abandoning its long standing policy of providing housing within the City of Napa, to the extent required, for individuals that are working in the unincorporated area. If this is the case, the portions of the DEIR that indicate to the contrary needs to be revised and an analysis of the effect this change in long standing city/county policy to protect the environment will have.

13.22

F. AIR QUALITY.

Due to the fact that the traffic measures are not properly analyzed, the air quality issues are also improperly analyzed. The County believes that once the traffic analysis is completed in a satisfactory manner it will demonstrate that a significant effect on air quality exists which must be resolved through appropraite mitigation measures. Unfortuantely, it is not possible for the County to comment on the air quality problems until a revised traffic analysis is completed.

13.23

G. MISCELLANEOUS.

The DEIR fails to discuss meaningfully the Napa County General Plan and the extent to which the draft City General Plan is inconistent with the County General Plan. This failure violates the State Environmental Guidelines. See 14 Cal.Adm.Code 15125(b)

13.24

APPENDIX E

Sierra Club Napa County Group
PO Box 644
Napa, CA 94559

14.

SIERRA CLUB

GENERAL PLAN COMMUNICATION # 14



November 18, 1996

John Yost, Planning Director
City of Napa Planning Department
P.O. Box 660
Napa, CA 94559

Dear Mr. Yost:

Attached please find the Sierra Club Napa County Group Written Comments on the City of Napa Draft Environmental Impact Report and Draft General Plan Policy Document *Envision Napa 2020*.

These comments represent our values and goals, and provide options for responsible and successful development of the City of Napa. We have achieved this through a critical analysis of the General Plan, the mitigation measures therein, and potential impacts as described in the Draft EIR and as illustrated by us. We believe that the changes we offer to you provide a good foundation for smart development that protects and utilizes our natural environment to make Napa an even better place to live.

We appreciate the opportunity to provide our written comments and look forward to continue working with you in our effort to ensure that the Draft EIR and General Plan protect our rich natural resource heritage while enhancing our quality of life.

Sincerely,

Anthony Norris, Chair
Sierra Club Napa County Group

SIERRA CLUB NAPA COUNTY GROUP WRITTEN COMMENTS ON THE CITY OF NAPA DRAFT ENVIRONMENTAL IMPACT REPORT AND DRAFT GENERAL PLAN POLICY DOCUMENT *ENVISION 2020*

I. INTRODUCTION

The City of Napa now has a decades old heritage of protecting its open space, with gusto. This effort has provided all of us with world famous vineyards and other agricultural practices, charming vistas, protected enclaves of native animal and plant species, growing recreational activities, rising consciousness of the potential glory and beauty and bounty of the Napa River, and a strengthening community will to improve on our heritage. The Draft General Plan and Draft Environmental Impact Report speak to our desire to protect and enhance our natural environment while improving our quality of life. Many aspects of these documents are commendable.

However, there are significant errors and omissions that we must address. In these written comments we strengthen hollow mitigation measures and consider impacts not included in these documents. Some mitigations in the Draft General Plan are actually plans to determine impacts or adopt policies at a later date. For example policy NR-4.4 states "The City shall adopt standards and regulations for the reduction and/or elimination of the nonpoint sources of pollution." However, Public Resource Code §21002 and §21081 and California Environmental Quality Act Guidelines §15002 and §15091 state that mitigation measures cannot be allowed to be developed at a later date. This was supported in a court case *Sundstrom v. County of Mendocino*. Therefor this Draft Environmental Impact Report's attempt to identify and analyze impacts of mitigation measures yet to be developed make this Draft Environmental Impact Report inadequate. Finally, the Draft General Plan, which contains the mitigation measures for the Draft Environmental Impact Report, has not been adopted. Any changes to this document will then require that the Draft Environmental Impact Report be revised and made available for public review and comment.

Also, the Draft Environmental Impact Report has too many cross references. In the California Environmental Quality Act Guidelines §150 it states that this document must be understood by the reader without the need of undue cross references. The California Act was modeled after the National Environmental Policy Act, and it states that in *Baltimore Gas and Electric Co. v. Natural Resources Defense Council* that an Environmental Impact Report should be essentially a self-contained instrument. The City of Napa Environmental Impact Report references numerous documents, including the Draft General Plan, the Background Document, fiscal analysis, BAQMD CEQA Guidelines, the Water System Optimization and Master Plan, and Policy Resolution No. 27.

II. THE DRAFT EIR COMMUNITY INPUT PROCESS IS FLAWED

This process initiates an environmental review of an incomplete Draft General Plan (DGP). Major issues, as identified by the Draft Environmental Impact Report (DEIR), still remain. They include developing the floodplain, the extension of the Rural Urban Limit (RUL), a higher density housing infill strategy, and growth management measures. (p. S-4,5). The City of Napa (City) must arrive at a stable and definite project before a valid environmental review may be conducted. The DGP process could have included an effort to address and/or resolve these issues before conducting the environmental review. Without this, the DEIR cannot identify and mitigate for potential project impacts. For example, the DEIR does not address the impacts of flood plain development without a flood project, although the intent of the DGP is to allow development in this area, whether with or without a flood control project (HS-3.9, LU 9.6, p. 1-21 objective #4).

III. IMPACT IDENTIFICATION AND ANALYSIS IS INADEQUATE, AND MITIGATION MEASURES ARE OFTEN VAGUE

The DEIR makes some attempt to identify impacts, and normally makes no attempt to analyze them. Usually the reader is expected to except the City's assertion that all mitigations in the DGP prevent any significant adverse impact of implementing the preferred alternative of the DGP without supporting data. At times there are contradictions between the DEIR and the DGP.

A. Land Use

The DEIR in Land Use Section 3.2 states that within the Rural Urban Limit (RUL) "Usable acreage does not include environmentally sensitive areas or waterbodies since those areas are generally not considered suitable for development." (p. 3.2-3). This is in contradiction to the DGP, where in Chapter 1, page 1-1, it states that "This General Plan emphasizes Napa's commitment to containing urban development within the RUL. As a result, much of the new development will occur within existing neighborhoods *and in areas with sensitive constraints, (e.g. hillsides, floodplain)*." The DEIR seems to preclude development in environmentally sensitive areas while the DGP allows this practice. The DGP, on page 1-21, also allows "the reclamation of lands near the river for sensitive urban use." Our recommendations for improved mitigation measures go a long way towards removing this contradiction.

The DGP and DEIR discuss maintenance of the RUL for at least the next 25 years. This would serve to help protect the region's natural resources into the next century. However, the DEIR does not adequately address land use impacts within the RUL, or added RUL expansions. The Big Ranch area includes significant open space, native vegetation, flood control, and watercourse characteristics, yet impacts of the DGP on these beneficial uses and resources are not considered. Stanly Ranch is even more sensitive. Both these areas have land use proposals in place. The DEIR cannot ignore current land use proposals and their potential impacts, especially on the scale of these two areas.

The DGP attempts to defend conversion of these lands and avoids discussion of development impacts because 1) it is consistent with the DGP (i.e. with itself) and zoning, and 2) the recommended land use is actually an expression of the collective vision of the community. (p. 3.26). These are not mitigations but verbiage that avoids discussion of adverse impacts. Further discussion of the Stanly Ranch area is provided below.

Impacts and growth inducing effects of the proposed RUL expansions are not adequately addressed. RUL expansion would envelope 440 acres of property. The DEIR dismisses the impacts of the RUL expansion encompassing the Napa State Hospital, asserting that the grounds are already "urbanized". In fact, undeveloped portions of hospital land serve as a buffer between developed portions of the property and the adjoining Skyline Park and additional open space to the south. Though purchase of a 100 acre portion of the property is the subject of negotiations between the State and private development interests, the DEIR does not consider the impact of more intensive use of the property that would be accommodated by its inclusion within the RUL. In fact, the City offers no justification for embracing these areas within the RUL other than a vague effort to "improve the area's defensibility". (p. 3.25).

Significant adverse impacts of including the 13 acre Foster Road area parcel are also not adequately addressed. The high elevation area is lacking in sewage, water, and safety services and is in a seismic hazard area. The City cites no legitimate benefit of including this area within the RUL.

The DGP policy A-2.1 sets out criteria for expanding the RUL. (p. 9-2). The DEIR fails to identify and analyze impacts of additional RUL expansions that would be allowed by this policy before the year 2020. Numerous parcels contiguous with the current RUL are eligible. The impact of these potential RUL expansions and the impacts of related growth and infrastructure and public service demands must be addressed by this EIR.

The growth rate projection and resulting impact analysis in the DEIR are not valid. The DEIR asserts that the DGP incorporates a "confined city policy" to maintain the current RUL and incorporates a "development pacing" strategy so that land within the RUL will be available for development throughout the 25 year planning period. Yet DGP policy contradict these goals. Policy A-2.1, described above, provides additional RUL expansion with no time restrictions. RUL expansions beyond those reviewed in the DEIR could begin immediately. Further, the DGP maintains that monitoring annual growth will let the City know when growth limits are needed. However, no methods of limiting growth are identified by the DGP. Absent any expressed growth limit, the City cannot promise availability of land within the RUL over time. Also, the DEIR is void of any consideration of the potential impacts of more rapid growth that may occur should favorable economic conditions develop. Growth rates analyzed in the DEIR have no validity: the 1996 ABAG projections show a growth rate that has already accelerated beyond the City's projections.

We suggest the following changes.

Delete policy A-2.1.
Create an LU designation: resource area for enviromentally sensitive zones where development is inappropriate. The designation would be applied to Stanly Ranch wetlands, the Giovannoni peninsula, wetland areas within the RUL along the Napa River into its tributaries, and habitat of threatened and endangered species. All wetland areas will be mapped and rated for habitat value.

Goal 6 (policy changes and additions are printed in bold and underlined)
LU-6.A . The City shall prepare a plan, including land use goals, a business incentive program, and design guidelines to promote high quality private and public development and redevelopment in the downtown. The plan should address design alternatives that would better incorporate the Napa River as a commercial, recreational, **and natural resource/environmental** focus for downtown.
Responsibility: Redevelopment & Economic Development
Planning Department
Community Resources
City Council
Parks and Recreation

Goal LU-9
LU-9.2 The City shall continue to apply special development standards to proposed development within **¼ mile of** the following areas:
a. Riparian corridors and wetlands
b. Hillsides
c. Critical wildlife habitat; and
d. Agriculture land outside the RUL.
Use of the ¼ mile buffer permits identification and mitigation of most direct adverse impacts on these resource and makes the policy measurable and more enforceable.

The DEIR fails to adequately analyze the substantial alterations in type and intensity of land use proposed for the Stanly Ranch. The DGP indicates that there is a proposal to develop Stanly Ranch as a destination resort "comprising of 300 lodging units, with conference, meeting room, and related facilities. An 18 hole golf course and clubhouse with recreational amenities are also planned." (p. 1-7). Also included in the plan are 550 homes and a commercial wine center. It provides for a Floor-Area-Ratio (FAR) of 0.50, but potentially up to 1.0. This proposal is clearly not in keeping with the character and identity of the surrounding area. It is wholly inappropriate for development on the fringe of the RUL. Such development would remove high quality vineyard land from use, generate substantial traffic, increase water runoff due to construction of impervious surfaces, and assault the visual aesthetics of the area.

In addition, the DGP would allow an island of significant urban development to replace the largest open space area within the RUL. This would result in loss of viable vineyard,

grazing, and wetland areas. It would also encourage sprawl in contradiction of the stated objectives of the DGP.

The DEIR overlooks the loss of agricultural lands by suggesting they be viewed in the context of "the greater Napa Valley" and suggests that Class I and II soils are the only lands suitable for local agriculture. But small vineyards of unusually high value are located on other classes of soils throughout the region. Many Valley vineyards, though small in the context of the greater Napa Valley are of critical value to specific local wineries in the local premium wine industry. Their significance cannot be measured simply by acreage or general soil class. Stanly Ranch is located in the Carneros Region, a world renown grape-growing appellation, and its vineyard lands ought to be recognized as some of the most valuable in existence.

Yet the DEIR fails to identify and analyze any impacts of the Stanly Ranch proposal.

The DEIR suggests that the DGP is consistent with adopted environmental goals of other local and regional jurisdictions. Development of the Stanly Ranch would place public utilities, housing, outdoor recreation, and commercial facilities in the flight path of the airport. The DEIR avoids identification and analysis of impacts to and from airport operations, saying that the Airport Land Use Commission would need to review any Stanly Ranch development plan. The review by itself cannot mitigate. As noted earlier, a DEIR cannot refer mitigation measures to be developed at a later date. This failure is another inadequate feature of this DEIR.

We request that a Specific Plan be required for any Stanly Ranch development proposal.

B. Transportation

The standards of significance are insufficient. Here the significance of impacts is only defined in terms of "level of service" (LOS). The DEIR ought to discuss and quantify impacts in terms of actual traffic volume. The only standard of adverse significant impact considered is the midrange LOS E. The DEIR thereby ignores actual change in traffic volumes and the accompanying impacts. Furthermore, performance of roadway segments is not addressed. This level of impact analysis is not acceptable in a DEIR. Traffic volume assumptions for noise, air quality, and biological resources should be disclosed.

Impacts of roadway expansions/extensions are not addressed. The DGP calls for roadway extensions and widenings over several creeks, identified in table 3-1 of the DGP as Solano Avenue, Soscol Avenue, Gasser Drive, and Terrace Drive. Road creek crossings have been found to be significant contributors to flooding in the City, yet flooding impacts, not to mention creek habitat and fish and wildlife impacts, were not identified and analyzed. This is due to the fact that the DGP does not include mitigation policies. Impacts of roadway widenings at Soscol Avenue and realignments at California Boulevard are not discussed. The DEIR is inadequate in this area.

The DEIR assumes it can build itself out of traffic problems that are caused by its land use policies. But the likelihood of funding for roadway improvements -- widenings, intersection changes, road connectors -- is not addressed. The DGP proposes a number of assessment districts and prays that other funds will be available through state and federal agencies while providing no indication of whether or not these funds are available. Funding sources for these improvements are not identified. Thus DGP funding policies are not suitable as mitigation measures. As before, the traffic impacts disclosed in the DEIR are invalid because they are based on road improvements not paid for in the mitigation measures of the DGP. The DEIR simply assumes that they will be built.

The DGP encourages bicycle use. Unfortunately, there is no implementation program for this mitigation, and no identification of funding responsibility, or potential. At this point we have to expect that the City is not serious about boosting bicycle use at this time.

The DEIR states that the "transportation system is well developed and is built out to its maximum requirement in most locations." (p. 3.3-1). The DEIR fails to provide data to substantiate this claim, so it would appear to be a subjective observation. Many in the community would disagree with the claim that the City has a well developed transportation system.

In regards to public transportation, policy T-5.2 states that "bus routes should be located within ¼ mile of 85% of city residences" to mitigate for aspects of the project. (p. 3-19). The DEIR states as fact that this goal is currently met by City's bus system. However the DEIR fails to provide data to support this assertion. For example, many Browns Valley residents may be further than ¼ mile from the nearest bus route. In addition, the DEIR fails to discuss the efficiency of the City's bus system. For example, it can take approximately 1 ½ hours to travel by bus from Salvador Elementary School to Browns Valley Elementary School. The same trip may take 10 to 15 minutes by private vehicle. It would seem, then, that the public transportation system fails to provide mitigation for the impacts of this plan in at least some instances. The DEIR must provide a more critical analysis of the City's public transportation system and include a discussion of the beneficial and adverse impacts. An increase in efficiency may encourage more motorists to use public transportation. We would like to see policies aimed at developing a more efficient public transportation system.

The DGP policy T-10.1 encourages owners of rail lines to maintain their systems as a mitigation measure to transport goods, and eventually people. The impacts of this policy deserve discussion in the DEIR for its potential to mitigate impacts of this plan including, but not limited to, increased resident and tourist traffic in and out of the Napa Valley.

C. Community Services and Utilities

a. Police and Fire

The DEIR impact analysis indicates that RUL extension will not extend response times. However, this assertion is not based on any data provided in the DEIR.

The Stanly Ranch development would require police and fire service for an extensive resort complex and around 550 housing units, representing a large increase in service demand. Yet the DEIR states that demand will not significantly increase since the Stanly Ranch is "within the RUL and existing beat structures." (p. 3.4-5, #1). This assumption is not supported by any analysis and certainly makes no intuitive sense.

The DEIR also fails to analyze the potential need for police services on Napa State Hospital (NSH) property once it is annexed to the City. It is assumed that NSH police would continue to cover the area themselves, again with no analysis to support the assumption. It is conceivable that in the future the City police department would become responsible for at least part of the service area of current NSH property. In fact, we are aware of on-going negotiations that would result in the sale of NSH property for development. The impacts on increased fire and police response times to subdivided areas of current NSH property must be addressed in this DEIR.

Impacts of increased fire and police response times to the RUL expansion area west of Foster Road are not analyzed in this DEIR. Due to the acknowledged low water pressure in this area, impacts of additional development in this area could further reduce water pressure. This could have significant adverse impacts on fire service.

b. Water Supply

The DEIR assumes that the DGP "would not result in demand in excess of the City of Napa's water supply system." (p. 3.4-6). Then it admits that this is not the case in times of multi-year droughts. Next it states that multi-year droughts are not expected during the period of this general plan. How did the City reach this conclusion, especially in light of the 1986-1992 drought? On what data is this assertion based? How can the community be reasonably sure it will not experience a multi-year drought in the next 25 years? Indeed, this is a dangerous, and baseless, assumption.

The DEIR also states that "water entitlements from the State Water Project (SWP) are growing significantly faster than projected growth in water demand in the City." (p. 3.4-6). Below that we learn that "periodic, unresolved environmental problems in the Sacramento River Delta ... make the reliability of the SWP entitlements unpredictable." (p. 3.4-6). It would appear that the City's water supply is indeed vulnerable. The potential impacts of increased growth with reduced SWP water supplies must be identified, analyzed and mitigated.

Mitigation measures in Goal CS-9 anticipate multi-year droughts but only implement the Water System Optimization and Master Plan. Implementation programs are not provided for the remaining policies under the goal. (p. 4-11,12). The Master Plan is not explained in the DEIR and its funding mechanism is missing. In fact, the City Council eliminated the latest strategy to pay for the Master Plan implementation due to public outcry. Thus the City is currently left without a plan to mitigate for growth impacts on water supply. The DEIR must provide this information so the entire community may be aware, and to minimize cross-reference to other documents as required by CEQA.

The impacts of providing water service to the RUL expansion area west of Foster Road are not analyzed or disclosed. The City is well aware of the problems of low water pressure in this area. Additional development will further worsen the water pressure problem in this area. Impacts should include, but not limit itself to, requirements for additional infrastructure to serve this area.

The DEIR asserts that the policies and implementation programs of the DGP will mitigate impacts of increasing wastewater treatment, storage, and disposal. These impacts will be mitigated primarily through additional facility construction and greater surface applications of partially reclaimed water. However, the DEIR fails to identify and analyze impacts of increased waste water treatment facilitates and surface applications of effluent. Potential impacts such as greater outflow to the Napa River in wet months, higher storm water flows into existing and new facilities, increased pond capacity, and expanded surface applications could be quite adverse. The DEIR states that impacts may be significant "... if development occurred in areas outside the planned sewage service boundary." (p. 3.4-4). However, no attempt is made to identify, analyze, nor mitigate this impact.

c. Trail Development

Without analysis or identification of potential impacts, the DEIR states that construction of the proposed trail system may have impacts on sensitive biological resources. We agree, and add that potential soil erosion, stream bank degradation, fish and wildlife disturbance, downstream sedimentation effects, etc., may be significant and adverse. Later in this document we offer stronger mitigation measures to ensure a lower level of impact.

D. Visual Quality

The location of the two southern gateways are arbitrary and inappropriate. Heading north the Napa Valley, travelers obtain their first perceptions of the City soon after entering the area around the Southern Crossing or from 221 by Suscol Ridge. It is here that the City and the valley are revealed. It is here that our community will be best served by maintaining high visual quality standards. We suggest the following changes to the visual gateway locations and mitigation measure of the DGP (policy changes are in bold and underlined):

Figure 1-3: Visual Gateways
Relocate the SW gateway area south to the junction of 12/121 & 12/29 and extending south past the Stanley Ranch and east to the Southern Crossing.
Relocate the SE gateway area south to the 12/29 & 221 junction closer to the Southern Crossing.

Goal LU-1
LU-1.5 The City shall refine the locations and concept of the key gateways to the city identified in Figure 1-3, and shall establish gateway and scenic corridor design and guidelines for both public and private development to ensure attractive entrances to

the City. **The visual gateways shall incorporate green ways, open space, riparian corridors, and wetland areas.**

The development proposal of Stanly Ranch has potential significant adverse impacts on the visual quality, scenic corridor, and gateway features of the City. The Ranch is visible from the 29 River Bridge and from 12-121, a state designated scenic highway. However, these impacts are not identified nor analyzed in the DEIR. We believe that the development proposed for Stanly Ranch is not in keeping with the current character and identity of the area. We submit that this proposal would be a significant adverse impact as defined in the DEIR Significance Criteria, in that it "results in a substantial, demonstrable negative aesthetic effect, such as obstruction of a scenic vista or the creation of an aesthetically offensive site open to public view."

Additional residential development of the RUL expansion area west of Foster Road would create very visible development on open, steep hills. The visual impact significance of the hillsides is dismissed as insignificant by the DEIR. Surely this is a controversial and subjective decision. Development of nearby hillsides at Westwood Hills Park has been controversial for years, subject of numerous public reviews, news paper articles, and public letters. Yet still, the DEIR ignores significant adverse impacts of aesthetically offensive housing development on hillsides. As we are aware of a proposal to purchase 100 acres of State Hospital land for development, the DEIR is required to identify and analyze the visual impacts of any development in this area as well.

E. Biological Resources

The DEIR acknowledges the sensitive nature of salt marsh species, and without analysis asserts that mitigation measures in the DGP make any impact insignificant. The DEIR simply references policies and implementation programs and assumes that these will mitigate any significant adverse impacts. The DEIR fails to show how adverse impacts of development in these very sensitive areas will be mitigated. Moreover, as mitigation the DEIR refers to policy LU-9.2 that says "The City shall continue to apply special development standards" yet makes no attempt to identify these standards. This is unacceptable. Mitigation is vague and circumvents public review of the impacts on salt marshes due to implementation of this DGP.

However, we agree with the DEIR when it states that "Potential impacts ... can be avoided by not developing any portion of a jurisdictional salt marsh." (p. 3.7-8). This is not secured by designating salt marshes and other sensitive environmental areas as PS-Public Serving, as does the DGP. This designation allows a Floor-Area-Ratio (FAR) of 0.40, potentially allowing 40% of these rare and vital areas to be developed. This would indeed be an adverse significant impact. We suggest a new designation, OS-Open Space. It is taken from the PS designation and would not allow development, although incidental improvements such as trails, visitor centers, rest rooms, etc., would be appropriate. Sensitive environmental areas, including remnants of native vegetation, within the RUL ought to receive strong consideration to be designated OS.

The mitigation measures to protect sensitive environmental areas are often vague with no real meaning. We suggest the following changes to these policies:

Goal LU-4

LU-4.12 **The City shall require new residential development to enhance, restore, and where practical, expand remaining riparian and wetland areas.**

LU-4.13 **The City shall require that new development on the City fringe to pay the full marginal cost of the development. This will provide economic incentive to for new development within the City center, and around the downtown area, and ensure that new development on the fringe bear its true cost.**

Goal LU-6

LU-6.4 The City shall promote riverfront development that reorients downtown to the Napa River and shall encourage creative designs during the development review process **that addresses the environmental sensitive, threatened and endangered species, and flood plain characteristics.**

Goal LU-9

LU-9.3 The City shall **require** the maintenance of wildlife corridors and **prohibit** the fragmentation of large natural plant communities when environmentally sensitive sites are developed, **or mitigate such fragmentation with science-based corridor plans between resulting habitat clusters and other wildlife corridors.**

LU-9.4 The City shall **discourage development in high priority** environmentally-sensitive areas and, where this fails, **require** cluster forms of development.

LU-9.5 When proposed development within the density ranges prescribed by the underlying land use designation is inconsistent with conservation of critical environmental resources, the City Council **shall** reduce the project size, scale, or density (to less than the minimum density) provided the City Council makes one or more of the following findings: (the remainder of this policy remains unchanged)

We wish to emphasize here that these land use goals are very good. However, many are not assigned to implementation programs. The City must provide language to actually implement these goals.

Additional policy changes include:

NR-1.3 The City shall **require** the planting of native plant species in natural habitats.

NR-1.4 The City shall review all future waterway improvement projects (e.g. flood control, dredging, private development), as well as all projects that are within **¼ mile (to account for flood dispersal areas and wetlands)** of the waterway, to ensure that they protect and minimize effects on the riparian and aquatic habitats. The City shall also **require** native plantings along the river and creek

banks to stabilize the banks, reduce sedimentation, reduce stormwater runoff volumes, **increase between-storm stream flows through greater recharge, provide valuable wildlife habitat throughout the year**, and enhance aquatic habitats.

NR-1.6 The City shall require as a condition of approval that development provide protection for significant on-site natural habitat ("whenever possible" stricken). If such habitat cannot be avoided due to **demonstrated economic hardship**, the City would permit equivalent, **science-based,** mitigation off-site. **In the case of residential development, the City shall perform this review during the subdivision process**.

NR-1.7 During development review, the City shall ("endeavor" stricken) identify and protect significant species and groves or clusters of trees on project sites.

F. Geology, Soils, and Seismology

The DEIR ignores its own standards and mitigations to justify a finding of insignificance in exposing people and structures to hazards. The DEIR gives a cursory evaluation of hazards to people and property caused by development in high risk areas. The DGP accommodates a cluster of residential development of around 550 housing units and a resort hotel in the Stanly Ranch; an area vulnerable to "very violent" ground shaking intensity from the West Napa Fault. (Figure 8-1A, p. 8-3). DGP policy HS-1.2 is the mitigation measure. However, the policy would "discourage siting of facilities necessary for emergency services, major utility lines and facilities" and likewise discourages "high occupancy structures." (p. 8-2). These are to be discouraged within areas subject to very strong, violent or very violent ground shaking. The mitigation is invalid since the DGP land use designations provide for those very uses on the Stanly Ranch.

Several other areas are given land use designations inconsistent with the DGP polices which are supposed to mitigate for impacts. The "Giovannoni Peninsula", a small spit of alluvium soil in the Alta Heights Planning Area is designated "MU", allowing from 10-40 units per acre, though this soil type is described as most susceptible to liquefaction. The finding that those risks are mitigated to a level of insignificance has no basis.

The DEIR also provides no analysis to support its finding that construction of residential homes on slopes of 30%, as would take place within the RUL expansion area west of Foster Road, can be mitigated by the policies offered in the DGP. We request the identification and analysis of impacts.

H. Hydrology and Water Quality

The DGP policy HS-3.9 actually enables increased floodplain development if an adequate and affordable flood control project is not agreed upon by the year 2000. It is not in agreement with the expressed natural resource objectives of the DGP. In fact, it is dangerous. Allowing floodplain development exposes additional life and property to flood

dangers, and irresponsibly increases flood risk down stream. To meet natural resource and health and safety objectives, development in the floodplain must be severely limited and riparian and wetland areas must be protected, restored when possible.

In general, measures to mitigate impacts of the DGP on flooding are inadequate. We suggest the following changes:

HS-3.2 The City shall continue to apply flood plain management regulations for development in the 100 year flood plain and floodway, **and require that new development show how it will affect downstream flows and flood potential**.

HS-3.6 The City shall support **alternative** programs and methods to reduce the flooding of the Napa River and its tributaries **in a manner that that maintains, to the greatest extent possible, the natural functions of the Napa River using the most cost-effective solutions**.

HS-3.10 The City shall require that flood control channels be kept in functioning condition. Tree cover on channel banks will be used to control in-channel vegetation growth unless physical limitations or constraints require alternate plans.

We believe it to be worthwhile to investigate the possibility of combining restoration and flood control efforts. Parks, trail areas, riparian areas, and constructed wetlands could all serve as temporary relief basins or wide outs to slow flood waters and prevent flooding down stream. Golf courses may be used in a similar manner.

III. CONCLUSION

The Sierra Club Napa County Group finds that the public process used to develop the DGP makes a good-faith effort to attain the environmental and quality of life goals as stated in the DEIR. However, the DEIR will not allow the community to reach these goals. We reach this conclusion by noting that the DEIR:

- does not adequately identify and analyze impacts of the DGP;
- mitigation measures are often inadequate and vague; and
- fails to review potential impacts of the Stanly Ranch development proposal.

In essence, mitigation measures in the DGP are so indeterminate and the DEIR so abstract that we can not agree with the DEIR when it states that there are not significant impacts anticipated from adoption and implementation of the DGP due to the self-mitigation nature of the DGP. (p. S-4).

We urge the DGP to be revised to avoid heavy mitigation and to develop a true "confined city policy" that also protects and restores wildlife habitat within the city.

15.

NAPA COUNTY LOCAL AGENCY FORMATION COMMISSION

1195 THIRD STREET, ROOM 310 · NAPA, CALIFORNIA 94559
VOICE 707/253-4805 FAX 707/253-4176

CHARLES WILSON
Executive Officer

GENERAL PLAN COMMUNICATION # 15



November 18, 1996

Deborah Faaborg, General Plan Project Manager
City of Napa Planning Department
P.O. Box 660
Napa, CA 94559

Subject: Comments on the Draft City of Napa General Plan Environmental Impact Report

Dear Ms. Faaborg:

This office acknowledges receipt of the City of Napa General Plan Draft Environmental Impact Report. Based on review of the draft document, the General Plan Project may require sphere of influence amendments and subsequent annexations of land to the City and the Napa Sanitation District. Accordingly, the Napa County Local Agency Formation Commission (Commission) is a Responsible Agency under the California Environmental Quality Act (CEQA).

The enclosed comments on the Draft EIR are submitted at this time to comply with CEQA timelines and the response deadline of November 18, 1996 provided in the Notice of Completion attached to your October 3, 1996 transmittal letter distributing the Draft City of Napa General Plan and EIR. Notwithstanding this submittal, the Commission is scheduled to review the proposed City General Plan at its December 11, 1996 meeting. It is very likely that additional comments on the draft plan and environmental documents will be forwarded to the City as an outcome of the Commission's review.

DRAFT EIR COMMENTS:

With the exception of the Stanly Ranch Planning Area, the Draft EIR adequately evaluates the environmental impacts and mitigation measures relating to issues under the jurisdiction of the Commission. 15.1

STANLY RANCH - PLANNING AREA NO. 12

The Draft EIR fails to assess adequately the environmental aspects and impacts of the proposed urbanization of Napa Planning Area No. 12, Stanly Ranch. The proposed General Plan designates this area for urban uses including not only **Tourist Commercial** but also **Single Family Residential and Single Family Infill** providing for up to 600 residential dwelling units. (Ref. Fig 1-15 and Table 1-4). The following environmental impacts of these proposals need to be analyzed fully in the Draft and Final EIR:

Loss of Agricultural and Open Space Land

The Stanley Ranch area containing approximately 928 acres is currently developed with agricultural and open space uses including over 100 acres planted in vineyard. The conversion of agricultural and open space land to urban uses is an unmitigated environmental impact which should be discussed in the EIR.

15-7

Growth Induction:

The proposed urbanization of the Stanley Ranch area including the extension of urban infrastructure and public services should be evaluated for its growth inducing impacts to adjacent land in agricultural and open space use. In this regard, over 800 acres of unincorporated land in agricultural and open space use lying between the Stanley Ranch and the existing City urbanized area to the north would be substantially surrounded by the City, inducing further development of these lands.

Cumulative Impacts

Page 1-7 of the Draft EIR makes reference to the preparation of a specific plan for the Stanly Ranch area. It is unclear whether a specific plan or conceptual plans have been filed and not completed for the Stanly Ranch area or whether the development described as "Preliminary conceptual plans" was used as a basis for environmentally assessing the development of the Stanly Ranch. If a specific plan or conceptual plan has been filed for the Stanly Ranch area, the General Plan Draft EIR must evaluate the environmental impacts associated with that development for cumulative impacts.

Alternatives Section

The Alternatives Section should evaluate the re-designation of the Stanley Ranch Area to an agricultural or open space designation. A second consideration for analysis is the detachment of this isolated "cherry stem" area from the City.

Compatibility with Adopted Plans:

As noted in the Draft EIR, the Stanly Ranch area is located outside of the Commission's adopted sphere of influence for the City of Napa. Please also note that the Stanly Ranch area is located outside of the Napa Sanitation District Sphere of Influence and District Boundary. As a result, practical implementation of the proposed plan for the Area will probably require approval by the Commission of adjustments to these spheres and boundaries. Because such approval by the Commission must be consistent with the following Government Code provisions pertaining to the Legislative Intent and Purpose of the Commission, the Draft EIR should discuss the consistency of the proposed urbanization with these constraints upon the Commission's discretion:

15.2

§ 56300. Legislative intent
It is the intent of the Legislature that each commission establish policies and exercise its powers pursuant to this part in a manner that encourages and provides planned, well-ordered, efficient urban development patterns with appropriate consideration of preserving open-space lands within those patterns.

§ 56301. Purpose and object of commission
Among the purposes of a commission are the discouragement of urban sprawl and the encouragement of the orderly formation and development of local agencies based upon local conditions and circumstances. One of the objects of the commission is to make studies and to obtain and furnish information which will contribute to the logical and reasonable development of local agencies in each county and to shape the development of local agencies so as to advantageously provide for the present and future needs of each county and its communities.

On behalf of the Napa County Local Agency Formation Commission, I would like to extend the Commission's appreciation of the opportunity to comment on the City of Napa General Plan Draft Environmental Impact Report.

Very truly yours,

Charles Wilson

Charles Wilson
Executive Officer

cc: Chairman John Brown and Members of the Commission
Margaret Woodbury, LAFCO Counsel

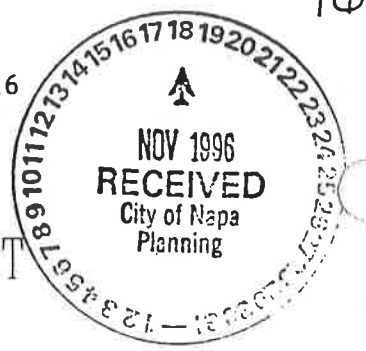
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CHRIS MALAN
255-7434
2945 ATLAS PEAK RD.

APPENDIX E

GENERAL PLAN COMMUNICATION #16

16.



DRAFT EIR COMMENTS

TO THE DRAFT POLICY DOCUMENT GENERAL PLAN 2020

C O M M E N T S–transportation

The draft EIR is lacking in its response to the draft policy document in the element of transportation. The draft policy document suggests that mass transportation should be developed but does insignificant planning for it.

1. Existing Conditions described in the DEIR pg. 3.3–1 states that transportation systems are built out to their '*maximum requirements in most locations*'. In chapter 3 of the draft policy document, pg. 3–1 it states '*do more with less*'.

16.1

2. The draft EIR (and the draft policy document) discusses future roadway improvements on page 3.3–7. Eighteen different road improvements are listed. Item #17 is the widening of Imola between Soscol and Coombs to four lanes. This would involve the Maxwell Bridge (aka Imola Bridge). The financial cost and environ–

16.2

16.2↑

mental impacts are not discussed at all.

3. The draft EIR supports the DPD to develop a viable funding source to implement the above 3.3-7 future roadway improvements. The draft policy document and the draft EIR recommends a street utility assessment district (see DEIR pg.3.3-9)

DO WE NEED ANOTHER ASSESSMENT DISTRICT

DO WE NEED MORE PAVEMENT-MORE FLOODING DUE TO INCREASED HARD SURFACES

16.3 DE WE NEED TO KEEP GIVING UP PRECIOUS LAND FOR PAVEMENT?

DO WE WANT INCREASING AIR POLLUTION?

DO WE NEED MORE MAINTENANCE COST ON ROADS THAT CONTINUALLY BLOW-OUT, WASH OUT AND ERODE. ROADS ARE A CONTINUOUS TAX BURDEN WITH NO RELIEF TO THIS DILEMMA IN THE NEAR FUTURE.

The draft EIR says little about these important environmental issues because the draft policy document does not discuss these issues. Therefore, the draft policy document is lacking. Since it is lacking, the solutions are lacking and not discussed.

16.4↓

4. The city is to consider (the draft policy document on page 3-28 under policy T-10.4)

CHRIS MALAN
255-7434
2945 ATLAS PEAK RD.

possible future transportation uses of existing rail right-of-way.

One possible solution is a SKY-TRAIN idea. Vancouver, Canada built a sky-train for the worlds fair on transportation and it serves has an efficient, timely and convenient form of transportation.

Mass transportation would:

16.4

REDUCE THE NEED TO CONTINUALLY ENCROACH ON AGRICULTURAL LANDS

CREATE A POSITIVE AMENITY TO THE TOURIST INDUSTRY

BRING NAPA SUCCESSFULLY INTO THE 21ST CENTURY

PROVIDE FLUID TRANSPORTATION TO RESIDENCES WITHIN THE CITY AND THE COUNTY.

WITH THE DECREASED USE OF PAVEMENT THERE WOULD BE INCREASED WATER FILTRATION THAT WOULD HELP PROMOTE HEALTHY GROUND WATER TABLES

THE TIME IS NOW TO CONSIDER THAT THE DRAFT POLICY DOCUMENT DOES LITTLE TO STATE A CLEAR POLICY AND IMPLEMENTATION FOR MASS TRANSPORTATION AND AGAIN THE DRAFT EIR IS LACKING.

APPENDIX E

GENERAL PLAN COMMUNICATION # 17



Response To The Draft Environmental Impact Report
by
A Committee of Concerned Citizens

This is a brief comment on the Draft Environmental Impact Report, in preparation for a more in-depth comment on the Draft General Plan. We first want to commend that the proposed revision maintains key elements of the current General Plan such as containing growth within the RUL, conserving the characteristics of existing neighborhoods and preserving and protecting natural resources. However, there is much within this report that generates more questions than it provides answers. It creates a vision of what the future may hold with respect to what life in Napa will be like that may not be consistent with preserving the "small town" image of Napa.

We refer to two items within the report:

1. Residential development of the Stanley Lane area within the RUL.

2. Future roadway improvements (Table 3.3-3, p.3.3-7).

Stanley Lane

The report does not adequately describe the effects of development on two important features of the area. One is the "gateway view" of Napa entering over the Southern Crossing or by way of SR 121 from Sonoma County. Not only is there the view to protect but the floodplain area and wetlands. Secondly, there was inadequate discussion of the fact that this area has limited access and would seem to require improvement of the existing road, Stanley Lane. There was inadequate discussion of the ability to provide fire and police protection to this area. The report was too sketchy in general with regard to development in this area. This is a controversial portion of the General Plan and it is somewhat suspicious that so little is revealed. 17.1

Future Roadway Improvements

In examining this table of information, again more questions come to mind than are answered. For example, a disquieting vision arises of what the adjacent area will look like when contemplating a widening of the First Street Bridge to four lanes or the widening of Imola Avenue to four lanes between Soscol and Coombs Street. The report states: " Overall, Napa's streets are relatively uncongested." Isn't this what we want to maintain? The question arises about what development should we allow to maintain this condition of uncongestion. Does the widening of streets also invite more traffic and subsequent development? Shouldn't it be a goal that to maintain our "small town" character, we strive to control the amount of traffic that flows through our town? 17.2

APPENDIX E

Committee of Concerned Citizens

Josephine Jenkins

Carol Whichard

Michele & Fred Smith

Nancy & Jeff Booth

Pam & Gary Greco

Jacqui & Richard Murray

Sue & Roy Rosselli

Lori Pesavento

Judy Nelson

Trudy Elm

Cathy Parker

Betti & Bill Frintner

Brenda Adams

Diane Fisher

Pat Howard

Cindy Black

Ana Kawakowalski

Nevidida Glace

Lori Townsend

Teresa LeBlanc

Linda Sager

Bridget Thornton

Keith Carter

Judy Heys

Betty Hopperstad

Lynn & Ron Mullins

Cynthia Knight

David Kramer

Sherry Kingsley

Candace Peterson

18.

GENERAL PLAN COMMUNICATION # 18



November 18, 1996

City of Napa
Planning Commission

Napa, CA 94558

To Whom It May Concern:

I am writing to object to the passage of the Environmental Impact Report for the City of Napa's "proposed" General Plan of development sited for the next 20 years.

In the first place, this report did not have the proper public forum for discussion. It was scheduled last on the agenda several weeks ago at 10:30pm, when several interested parties could not stay because of the late hour. When a few folks complained about this the next day, the proposed E.I.R. was placed on the agenda for public critiquing the following week, but according to Chris Malan's commentary in the Napa Register, 11-12-96, most people who were present at the first hearing did not know the hearing was extended and did not show up to participate. 18.1

My biggest objection against passage of the E.I.R. is that it is premature to pass an E.I.R. on a General Plan that is only a proposal and has not had the scrutiny for public discussion about it's scope, expense and how it will be funded.

Passage of the Environmental Impact Report before the passage of the General Plan itself does not seem reasonable or cost effective. I understand many on this committee have put a lot of time and effort into these proposals which is appreciated. However, the growth of our still quaint little 'rural city' must be moderate and publicly understood, if possible. 18.2

Thank You.

Susan Levine-Roust

Susan Levine-Roust
2341 Joanne Circle
Napa, CA 94559
(707)226-3975

SLR/gjmp

19.

November 18, 1996

GENERAL PLAN COMMUNICATION # 19

John Yost, Planning Director
City of Napa, Planning Department
1600 First Street
Napa, Ca 94559-0660



RE: Comments on City of Napa General Plan Draft EIR

Dear Mr. Yost

I am writing to comment on the City of Napa General Plan Draft EIR, specifically that area North of Trancas and Redwood Road. My major concerns are:

1) With the recent and continued development in the North and North-Western areas (#1, Linda Vista and #2, Vintage) of the City of Napa, where is the storm water being diverted and where will it be diverted in the future? Where are the open space areas located within North Napa (#1, Linda Vista and #2, Vintage) that are and will be available for ground water recharge? How much will the proposed "Plan" add to the flooding that already occurs in the neighborhoods? 19.1

2) It was my understanding that the BRRSP would supersede the General Plan, has this changed? At the recent city council meeting (October 22,1996) with the adoption of the BRRSPA plans, it was my understanding that Sierra Ave and Garfield Lane, as well as, Villa Lane at Garfield Lane would not be connected, however, the General Plan Draft EIR (Table 3.3-2 page 3.3-5) shows that the City plans "future intersections" at these locations; can these errors be corrected ? Again, "Future Roadway Improvements" of Table 3.3-3, listed on page 3.3-7, # 3, #4, and #5 were all rejected; why then, are they still listed within the City of Napa General Plan Draft EIR? It was my understanding that Sierra Ave would no longer be considered a Collector (Table 3.11-2, page 3.11-8), shouldn't this change be noted in the EIR? Won't the figures noted in the this Draft EIR particularly sections 3.3 and 3.10 need to be adjusted to the changes noted above? 19.2

3) I continue to have strong concerns concerning our natural resources and the bio-diversity of life that depend on the habitat provided for them in and along the Salvador Channel. I have observed a variety of plants and animals that are of special concern to me. Throughout the year there are continuous and changing cycles of life that feed and or reproduce in the area.

There are a variety of trees most significantly the Valley Oak (*Quercus Lobata*) and the Black Walnut (*Juglans Californica*) that reproduce in and around the area. There are open spaces suitable for the replenishing of native grasslands.

There are a variety of raptors (kestrels, falcons and hawks) that feed in the open fields, egrets and kingfishers that feed along the waterway, both the unusual Great Blue Heron and the Green Back Heron that feed and nest within or along the creek, the unusually small titmouse, reed warbler, and flycatcher that live amongst the reeds and / or willows, as well as, the more common varieties of birds (finches, hummingbirds, jays, orioles, owls, pigeons, quail, ravens, robins, sparrows, vultures, warblers, woodpeckers, and others too numerous to mention).

Currently, the Salmon are migrating up the Channel, the steel head trout will be here within a few months. There are freshwater clams, craw dads, frogs and the Western Pond Turtle that use this waterway, both the California Slender Salamander (*Pacificus attenuatus*) and the California Newt (*Taricha torosa*) breed within the creeks domain.

There are a variety of insects (such as water beetles, butterflies, and dragonflies) that are endemic, or use the plants along the waterway as their host plants.

Before approving the Draft EIR for the City of Napa General Plan, why can't the city explore the possibility of keeping an area open within its boundaries for seasonal wetlands? This area has a multitude of uses that will not be mitigated within the RUL. It seems that this area is of significant value to be preserved for wildlife, nature study and seasonal wetlands. Couldn't an area such as that located between the Salvador Channel and the Gasser tributary be used in a combination floodplain and / or flood-water retention basin?

4) Who are the 19 members of the Citizen Advisory Committee (CAC), and are any of these members residing (living on a daily basis) within the Big Ranch Road area? [see S2 and Appendix A, Envision NAPA 2020, page 1]

Many of my other concerns are in understanding how the city will meet it's goals or objectives in the development of this General Plan: I do not comprehend how you are meeting the seven project objectives in North Napa.

How does an approximate 50% increase of the dwelling units (and therefore population), the change in zoning from County to City...or both the minor and major expansions of the RUL, the loss of the remaining open space, the storm water runoff diversion to the Salvador Channel...which is already past capacity, and the loss of habitat (that which will be damaged and eliminated) meet these objectives? How is the character of my neighborhood maintained?

How does this improve the job /housing market (Aren't there already more homes on the market then people available, or with the means, to purchase them? Aren't there already more people out of work then jobs available to them?)? Even in the construction industry aren't the jobs only short-term, once the homes are built the job is done?

If we recognize Napa's precious natural resources why do we ignore those within the City Limits? How does diverting more water into the downtown area (via the Salvador Channel) during times of flooding seek to "maintain a vital and healthy Downtown" ? With the high environmental loss and monetary cost due to flooding, why do we seek to cause a greater impact rather than to prevent , while we still have the opportunity? [S3. on page S-2 and again on pages 2-4 and 5-1]

Will you explain how the City of Napa's Goals listed on pages 2-5 to and including 2-9 are met? Isn't A-1 the only possibility? How can these goals be met in North Napa by the proposed increase of the population of this area (#1, Linda Vista and #2, Vintage) in less than 25 years?

Page 2-14 Does the figure of the 1,611 additional dwelling units inclusive of those approximately 843 units of the Big Ranch Road Specific Plan Area recently approved by the City Council or, are they in addition to those 843 units?

Page 3.4-2 and 3.4-3 It was my understanding that neither the water nor the

19.7 NSD issues had as yet been determined; can you explain to me when these issues were resolved and implemented?

19.8 Page 3.7-2 to 3.7-3 What is the location of the retained grasslands within the Napa City limits or RUL line? How much property is this? And, what percent of the total land within the RUL does this property represent?

19.9 Page 3.7-3 to and including 3.7-9 Why is it not possible to retain enough open space and habitat to sustain our plants and animals (so that they can actually perform all of their biological functions, such as to eat and reproduce, not only a minimal effort so that they can be seen by us on an occasion)?

19.10 Page 3.9-1, under section 3.9 titled Hydrology and Water Quality, the flood event of 1993 and those of 1995 are not addressed, why? How has the development and in fill that has occurred since 1986, impacted those in the neighborhoods and downstream of such developments? How have these events changed this EIR and what laws or regulations have changed since February of 1986 and March of 1995 that may impact this report? If the last remaining agricultural lands within the RUL which are where ground water is replenished and saturation occurs, or land remains under water for days or weeks, and development is to occur, where is this water expected to go?

19.11 If flooding occurs when the Napa River at Oak Knoll Avenue exceeds about 15,000 cubic feet per second, isn't it tenable to expect that at about that same time, the flood waters from Salvador Channel will be joining the Napa River just north of Trancas Street. Since, the largest increase in development, within the RUL, is expected to occur North and North-West of this location, and the only available drainage is the Salvador Channel, my question is: "how will these waters avoid contributing to the flooding of downtown Napa"? If there are significant impacts already noted in the Big Ranch Road EIR Draft (pages 92-97), even prior to the approved 843 homes, how then can the significant criteria mentioned on page 3.9-2 of the general plan's Draft EIR be expected to be met with an additional 2,888 housing units developed in North /North-west Napa?

19.12 How will participation in FEMA'S insurance program lessen the occurrence of flood or protect those living in a development (once it has occurred) during a flood event? Does this insurance prevent the residents from going through the stress that occurs during loss of home or the trauma that occurs when faced with the possible loss of ones life? Does our city have some preventative measures that the general

population is not aware of during "Acts of God"? Isn't there a FEMA law that prevents us from building in an area that we know <u>will</u> flood, or a law that prevents a developer from protecting his properties by knowingly causing his neighbors, or those down water, to flood in the future? 19.12

Page 3.9-3 Who is the authority that has told the city that there will be minimal storm water runoff with the development suggested by the general plan? How can there be minimal runoff volumes added to the City's storm water drainage system in the North Napa area if there is at least a 50% increase in homes? Have our city experts consulted with any national acknowledged authority? If the problems in this area are minimal why hasn't the city been able to take care of the runoff in the past? 19.13

How many of the 1,037 acres that are slated for development are located in the North/ North-West Napa areas? Along with the approximate 215 acres that are planned for development in the BRRSPA, how many acres of land total will be drained into the Salvador Channel that is already past capacity? 19.14

What percent of the 426-square-mile watershed that is drained by the Napa River is being left open for seasonal wetlands? What acreage and what percent of the approximate 1.62 sq. miles of remaining acreage left within the RUL is to be left as open space or seasonal wetlands? What is the total acreage, and thereby total percent of the property within the RUL being left as open space / seasonal wetlands and floodway / floodplain? If there are no properties being set aside it would seem that "0.0038 percent" located within the RUL is not enough, or is it less than what is minimally needed? How can these issues possibly be mitigated within the RUL if there is no other property available? 19.15

Page 3.9-3 Why isn't the Salvador Channel acknowledged as a natural drainage way within the RUL? Even though the city has attempted to contain this channel within the cement pipes and cement ditches from west of Hi 29 through Vintage High School , the channel retains much of it's natural flow South-East of Vintage to the Napa River. How has the City enhanced this water way in the past? How does it propose to enhance it in the future beyond the ability of "God" or "Mother Earth"? If the Plan wanted to protect the habitat from incompatible urban uses (3.9-4) wouldn't it refuse to develop knowing that the raparian habitat along the river or it's tributaries would be destroyed and acknowledging that no mitigation measures will make up for this loss? 19.16

Page 3.10-2 How can the General Plan draft EIR claim that VMT is lower than 19.17

19.17 that rate of increase in population when it is based on a projection? Can you clarify this?

Page 3.11-2 under the heading "Major Arterials" Soscol Ave - Silverado trail to Trancas, why is the Average Vehicle Speed listed as 35? The posted speed limit is 40 MPH. Under "Minor Arterials" Big Ranch Road -Trancas to northern city limits, why is the Average Vehicle Speed listed as 30? The posted speed limit is 50 MPH. The average speed is often above that posted, or are these speed limits that are proposed for the future?

19.18

19.19 Page 3.11-8 Isn't Sierra Ave is no longer considered a collector St. ? If so, then how will this affect the surrounding streets?

Page 4-1 I do not understand how there can be no Significant Unavoidable Adverse Impacts associated with the adoption and implementation of this document when there have been several noted in the BRRSPA plan; this document has a substantial increase of homes; how can this be so?

19.20

Page 4-2 How will the Napa Valley be known around the world, after the open space resources are depleted? Why doesn't Napa City retain some open space within it's limits? We constantly compare our county with those neighboring us, Sonoma County to the west and Solano County to the south and east. Yet those counties are much bigger, we are much smaller, we are unique and shouldn't even try to compete. If we plan to increase our dwelling units by 15,500 in less than 20 years (80% which will be located within the city limits) or over 30% of our total, then will we again extend our RUL in 2015?

19.21

Page 4-3 ,Table 4-1, Why is there a difference of 6,000 people between what the City of Napa (Draft general plan), lists as the population of 1990 and what the City of Napa (ABAG), lists as the population in 1990? What was the actual population in 1990, and what is the actual population now?

19.22

Susan Rushing-Hart

73 Garfield Ln.

Napa Ca. 94558

20.

JOAN AND JOHN RUTHERFORD 88 VALLEY CLUB CIRCLE NAPA CA 94558 707.224.0217

November 16, 1996

GENERAL PLAN COMMUNICATION # 20



Mr. John Yost
Planning Director, City of Napa Planning Dept.
P.O. Box 660
Napa, CA 94559

Dear Mr. Yost:

I am heartened by the conservative nature of Napa's Draft Environmental Impact Report, however: During our very first Napa Planning Commission Meeting, several months ago, a Mr. Marks commented, concerning a very large Napa development, that said development would not deal with negative water, sewer, flooding or traffic impacts on the adjacent community. As newcomers to Napa, Joan and I were, to say the least unbelieving as that very development became a reality. So, you see . . . Until the general plan deals with such a threat to our lifestyles, safety and real estate values, there is no general plan.

20.1

Sincerely,
John Rutherford

cc: Napa Valley Register

APPENDIX E

North Bay Association of REALTORS®

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November 15, 1996 GENERAL PLAN COMMUNICATION #21



Mr. John Yost, Planning Director
City of Napa
Napa, CA

Dear Mr. Yost:

As you know, we are currently reviewing all the documents related to Napa's General Plan update. And, as hearings on them before the City Council are set, we plan to share specific observations.

However, we feel the need to make a general observation now, before the comment period on the EIR officially closes November 18. Your plan does a worthy job of attempting to balance the multitude of competing factors – from economic realities and housing needs to environmental issues – which face any community. However, the scope of the plan is based on what we believe to be a faulty premise: it anticipates growth slowing almost to nothing as Napa achieves "build out." 21.1

In our opinion, the entire issue of "build out" needs more thorough examination, especially as it becomes a factor in the city's economic well-being. We believe that the presence of an inflexible rural urban limit line mandates higher densities – at least in selected areas – than the current EIR and Plan now project. We believe more potential areas of MU zoning should be added. And we believe the entire notion of feathering toward the RUL should be examined in light of not just short term needs but Napa's long-term economic health.

We fully support the Chamber of Commerce call for development of a separate Economic Element. And we recommend land use projections be included in the subset of factors analyzed by this new Element. 21.2

Thank you for this opportunity to comment. We look forward to participating further in this most important dialogue.

Sincerely,

Lisa A. Marsey
Napa Chapter President

COPY

22.

GENERAL PLAN COMMUNICATION #22

November 18, 1996

City of Napa Planning Commission
% Planning Department
1600 First Street
Napa, California 94559

Re: Comments on the Draft General Plan
Environmental Impact Report

Dear Planning Commission:

I am writing on behalf of my family and neighbors in Liberty/Sage neighborhood.

We are writing to comment on, and object to, the General Plan Environmental Impact Report which indicates that a connector street should be put through in a form of an extension through Souza Lane - east to Capitola Avenue. We specifically refer you to page 3.3-7, Item No. 12 and page 3-11, paragraph T-1.9b of the Draft Environmental Impact Report.

We believe that the Souza Lane extension would have a negative impact on our area, due to increased traffic flow through the area, and would fail to create any significant benefit for the broader Terrace/Shurtleff area.

A small group of us visited the Public Works Department to discuss with them our understanding of the environmental analysis that was done for the Environmental Impact Report. It was stated in that meeting that the reason for the Souza Lane extension was to add to a connector street from one part of this area to another. In other words, to increase traffic flow throughout this area. We question the basic premise that this is necessary or that it would be desirable and beneficial to most residents. 22.1

The Public Works Department indicated that "no one wants connector streets to go through their neighborhoods." If that is the case then the basic concept of putting through connector streets, so that traffic flows through in every area of the city, needs to be reevaluated.

We believe that people throughout the city are saying that they are willing to put up with the traffic on the bigger streets in order to preserve the sanctity and closeness of our neighborhoods. The citizens of this city are in favor of slow growth. The citizens of this city want peace and quiet. We live out in the country. When you make that choice you are saying that you are willing to accept the minor inconveniences of waiting a little longer for a traffic light to change on a major street in order to keep traffic slower closer to your home.

The Police Department and the Fire Department may say that response time will be improved by the Souza Lane extension through our area. We do not believe this to be so. This is clear from talking with firefighters who drive the fire trucks and our own neighbor who is a California Highway Patrol Officer. They say that in an emergency they would very likely use the Coombsville Road to Terrace Drive path in order to get to our neighborhood or the surrounding neighborhoods most expeditiously. The Souza Lane extension would only minimally improve access. In the five years our neighborhood has been in existence we have never seen a true emergency occur. We do not believe that there has been a single fatality or serious problem in our area that having the Souza Lane extension would have made a difference to, in terms of response time.

22.1

The planned Souza Lane extension is even more concerning when we look at the Altamura project that has been proposed. The Altamura project would, at this point, require a cul-de-sac at the end of Liberty Street. This would necessarily mean that Sage Way could become the connector street for the Souza Lane extension. This was never the intention when the Souza Lane extension was originally proposed. In fact, Liberty Lane was to be the connector street; it was built wider for that purpose.

The serious hazard to all of the children on Sage Way would be greatly exacerbated by turning Sage Way into a connector street which is a danger at this point due to current Planning Department stand on the Altamura subdivision as it is currently configured.

We do not understand why the Planning Department wants to destroy the closeness of our neighborhood by putting connector streets through our neighborhood that necessarily increase traffic and which is a hazard to our children.

Many people who come to our neighborhood immediately get a sense of the well-being and warmth generated by the caring we all feel for each other. We urge you to reconsider your position on the Souza Lane extension.

In our minds, the City's desire to add one more connector street by way of the Souza Lane extension does not justify the devastating negative environmental impact it would have on our neighborhood. 22.1

Very truly yours,

Cathy A. Zeller

Cathy Zeller, on behalf of
Jeff Erickson
Peter Glass
Donna Glass
Holly Blackney
Rick Blackney
Jeff Dunlap
Anne Dunlap
Tom Pierce
Pam Pierce
Leslie Walder
Mark Walder
Eleanor Bartlett
Bill Bartlett
Robert Glass
Janet Wagner
Ben Livsey
Clara Livesey

cc: Brad Wagenknecht, Mayor
Cindy Watter, Council Member
Joanne Busenbark, Council Member
Harry Martin, Council Member
Jill Techel, Council Member
John Yost, Director - City of Napa Planning Department
Mike O'Bryon, City of Napa Public Works Department
John Draper, City of Napa Public Works Department

Planning.ltr/111896

GENERAL PLAN COMMUNICATION #23

John Yost, Planning Director
City of Napa Planning Department
PO Box 660
Napa, Calif 94559

Nov 18, 199



City of Napa General Plan Draft E.I.R.

The Draft E.I.R. states on page 3.4-2 that Napa's water demands are met by 3 sources, Lake Hennessey (31,000 A-F), Milken Reservoir (1,980 A-F with 1,200 A-F a dependable yield, and the State Water Project (18 800 AF with 45% of that a dependable yield or 8,460 A.F.)

I talked to Don Redenhour, City Water Manager, and he said Lake Hennessey had a dependable yield of 5,000 AF. This information is tabulated below

Water Source	Best Possible Yield	Dependable Yield
Lake Hennessey	31,000 AF	5,000 AF
Milken Reservoir	1,980 AF	1,200 AF
State Water Project	6,200 AF (1996) - 18,800 (2021)	2790 AF (1996) - 8460 AF (2
	38,180 AF (1996) - 51,780 (202)	8,790 (1996) - 14,660 AF

23.1

The Draft Policy Document states the current entitlement from the State water project is 6,200 AF (pg 4-11) & it isn't sufficient

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Planning

since the City had to buy 6,500 AF from Yuba County Water Agency. The E.I.R. says that the current normalized demand is 13,550 AF. (The Draft Policy Document says on page 4-16 that prior to the drought, Napa's peak annual demand had been 14,400 AF.)

The bottom line is that the year 1996 dependable yield is 8,790 AF and this doesn't satisfy the 1986 peak annual demand of 14,400 AF & the current normalized demand of 13,550 AF. This is all obvious to the normal water customer since we all had to go on rationing & let our lawns, gardens etc die. When the dependable yield rises to 14,660 AF in 2021 it will barely satisfy the current demand, much less the year 20[illegible] demand of 16,566 AF (EIR page 3.4-2.)

23.1

The City shouldn't be allowing property to be developed when there isn't sufficient dependable yield water for the existing customers & the City should not resort to rationing to meet the water needs as this causes existing customers to have to replace their landscaping after a drought, at considerable co[illegible]

Sincerely
Dennis Schlesinger

24.

Friends of the Napa River

The Landmarks Building
1026 First Street • Napa, CA 94559
Phone (707) 255-8646 • Fax (707) 255-2164

GENERAL PLAN COMMUNICATION # 24



FROM: FRIENDS OF THE NAPA RIVER

TO: THE CITY OF NAPA, CALIFORNIA

RE: ADDITIONAL WRITTEN COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT AND DRAFT GENERAL PLAN POLICY DOCUMENT

December 2, 1996

A: INTRODUCTION

Our major concern, as "the community's voice for the Napa River and its watershed," is the Napa River, its healthy future and its healthy integration into the fabric of life and culture in Napa Valley. These comments constitute an addition to our brief written submission to the General Plan hearing October 17, 1996, a submission which included Guidelines for the Urban Riverfront. We appreciate the extension of time granted so that we could make a more considered evaluation of the documents.

We understand that, technically, we should be addressing only those elements included in the DEIR. But because the self-mitigating nature of the Draft Policy Document excludes any reference in the DEIR to any element whose impact is deemed insignificant, the DEIR is a sparse source of opportunity for comment on the Napa River. The Draft Plan is, in effect, a DEIR. We are, therefore, addressing both documents.

In summary, we welcome the generally enlightened and sensitive approach taken to our community's fundamental struggle between growth and protection of natural resources and quality of life. We see many of the policies which Friends of the Napa River has espoused over the last several years incorporated into Envision 2020. The documents also substantially reflect the recognition that an economically and socially successful future for the City of Napa and the Napa Valley lies in aggressive protection of natural resources such as rivers and streams, hillsides, agriculture, plant and animal habitats, and open space. We endorse the policy of adopting Best Management Practices (BMP) as a standard to assure this protection.

24.1

We see some planning lapses and ommissions, however, which we wish to address:

: **The Napa River is not given sufficient focus and attention to reflect its potential importance to the future of the City of Napa**. True, the river is referred to as "a natural corridor and recreational spine connecting neighborhoods and providing a focus for downtown," as "an integral part of the city's identity," and its downtown riverfront as "an untapped but potentially powerful aesthetic resource." The Plan also states, as policy, that "the City shall promote riverfront development that reorients downtown to the Napa River..." But references to the City's plans for the river are so scattered throughout the document that any hope the document may have had of transmitting a policy of making the river central to Napa's future is thoroughly diluted and diffused. and the DEIR, in its Overview: Project Objectives (p S-2, S3, Nos. 1-7) does not even mention the river.

This absence of focus is all the more dramatic as we study the new river Area Plan for Petaluma, a neighboring river city which recognizes that "river planning is central to Petaluma planning... the core of any General Plan for Petaluma." Its published river plan is thicker than Napa's entire General Plan Policy Document! Petaluma -- with numerous other American cities from New York City to Boise, Idaho -- recognizes what Napa knows but has not yet found the means to adequately and clearly express in its General Plan: that a fine, beautiful and healthy river running through the heart of a city is the key to a dynamic socio-economic future.

24.2 Several of our concerns rise from the fact that the Citizen's Advisory Committee (CAC) and the Planning Department did not have access, during the 1991-93 planning phase, to two major river events which have altered visions and planning for the Napa River, namely, 1) The Community Coalition's Flood Management Plan now moving towards completion, which brings a wholly new multi-objective, "living river" philosophy to solving flood issues, and 2) the American Center for Wine Food and the Arts (CWFA), whose site on the Oxbow shifts the 'center of gravity' for a revitalized downtown riverfront district. The Plan does admirably in trying to integrate the two after the fact but, because of their importance, the Flood Plan and CWFA must have more thorough and carefully considered treatment in the final General Plan.

In broadest terms, we recommend that the General Plan bring more focus to four central themes as regards the Napa River:

1: **The "living river" theme** must run through all planning goals for the river.

2: **The vision of a vibrant urban riverfront** -- one in harmony with the community's character and the river's health -- is the key to the stable revitalization of downtown Napa.

3: **The dual goals of the flood management approach to the flooding issue -- flood protection <u>and</u> the restoration of the river and its watershed** -- must be endorsed.

4: **The need to recognize the river's unique importance in the General Plan by making it a distinct and separate Subject Area**, joining the eight already identified.

As introductory comment, too, we found many policies, implementations, and mitigations far too vague and ambiguous; we found the treatment of alternatives to be confusing and incomplete. Just one example: The development of alternatives to a flood plan are totally inadequate (Draft Plan p 8-13,HS-3.1 to 3-9). We will make more specific comments on that below. 24.3

A general concern we have is that the General Plan not be overridden by City Council and Planning Commission, and that its policies **be implemented**. Our concern was recently raised by both bodies overriding in the Big Ranch Road Specific Plan the stated policies of the Draft Policy Document (See Policy Document p 7-4,5; p 8-13, HS 3.6). Although it is not yet a formal document, is the City committed to its policies and principles? 24.4

B: GENERAL COMMENTS

We have four general proposals by which the General Plan can achieve the above four theme goals:

1: **Create a separate Subject Area element for the Napa River** which consolidates the Plan's several references to the importance of the river and state that goal very clearly. Even a cursory study of the experience of other American cities will reveal that a healthy and sensitively restored and developed urban river is the single most powerful force in 'turning around' a "deteriorated" and "blighted" downtown, in increasing property values all along the river, and in providing an incomparable recreational and spiritual resource for an entire city. It is a galvanizing force for pride, and a lure to visitors. But the city must make a clear and specific committment to the central role of the river. Specific references to the river should remain where they are, scattered through the Plan, but the major goals, policies and implementations must be centralized. 24.5

To support the centrality of the river to the City of Napa's future, several things must be built into the General Plan:

2: A **Specific Plan** for the urban reaches (Planning Areas #8 and #9), and **New Land Use designations for a 'river corridor'** running from north to south of the city's boudaries.

The proposed Land Use designations simply carry the neighborhood uses out to the riverbanks -- much is very loosely designated Mixed Use, with no consideration of the need for special planning along the river corridor so that the land uses are appropriate to the restored "living river" which will be created by the flood management plan -- uses which could not have been envisioned by the CAC. For example: the removal of toxic sites on Oil Company Road, the creation of extensive wetland strips, the bypass across the Oxbow, and expansion of recreational potential northeast of the Imola bridge all open the possibility of new uses. Other examples: a) On the Stanley Ranch, a PS Land Use for the wetland flanking the Napa River is inappropriate since it permits up to 40% buildout in a zone which calls for an Open Space designation (which does not now specifically exist, but should) and, b) The CWFA's DEIR addresses current Land Use designations, which are very different from those proposed in the new Plan; TC has been inexplicably changed to TRI in the strip 24.6

of land between the CWFA and Expo on the east bank of the river. Where did the new LUs come from? This is confusing, misleading, and dangerous.

24.6 Appropriate siting of commercial activity, cluster housing, and open space greenbelts must be planned for and reflected in the 'river corridor' concept. Helter-skelter riverside development is not currently mitigated against by proposed Land Use designations.

3: Explain in detail and **adopt as policy the new Flood Management Plan's concept of a multi-objective project that combines flood protection with river restoration** and a watershed approach. The General Plan must explain that, because the City is a partner with the Corps of Engineers at a time when the national policy for flood control has been transformed to an environmentally-sensitive one, the City can achieve both goals at a cost far less than if it were to undertake either on its own. The Plan should include (perhaps in an appendix) a map of the proposed Coalition plan. Vague references to "alternatives" to a flood plan do not honestly address the reality, which is that **flood protection is absolutely critical to a revitalized downtown Napa**, and that the General Plan's endorsement of the current, extraordinary community process is essential. The current Draft

24.7 Plan views flood protection in purely economic terms: prevention of damage and the potential for development in now undevelopable floodplain lands. The DEIR's Project Objectives (p S-2, S3, No. 7) makes an ambiguous statement: "Consider the environmental and financial costs of flood control along the Napa River and encourage appropriate development." Whether or not the Coalition flood plan can be achieved, the City must adopt a more visionary policy of viewing any flood management plan as combining the narrow economic benefits already identified with the far larger benefits -- economic, environmental, cultural, social, recreational -- which accrue from the multi-objective approach: flood protection combined with river restoration, achieved with the highest aesthetic standards. The geomorphologically stable river and rich restoration of riparian habitats and wetlands now being planned, with 100-year flood protection, will be a model for the nation and a boon to the City of Napa in many ways.

4: **The new General Plan must more fully and clearly embrace the Urban Downtown Riverfront as key to the revitalization of downtown Napa**. The siting of the CWFA on the Oxbow gives the City an incomparable anchor at the north, while plans for the historic Hatt Building south of Third give a dynamic attraction towards the southern end of the urban reach. But those two projects risk being isolated islands in continuing 'blighted' and 'deteriorated' waterfront district unless the General Plan mandates, by

24.8 policy and implementation (with an urgent, short time frame), the creation of a Specific Plan for the Urban Waterfront District. A sprucing up of Soscol is planned even before the far more important planning for the Center's environs on both sides of the river and for the river corridor in which the CWFA sits.

The need for a **Specific Plan** and for **Development and Design Guidelines** has long been a concern of Friends of the Napa River. We have already submitted a copy of the Guidelines a large group of community professionals recently prepared under our aegis, and we urge that they be

included in the General Plan's appendix as a base point for further refinement of Guidelines which must be adopted by the City Council and incorporated into the General Plan. The General Plan should also state as policy, with implementation, that guidelines for the entire riverfront within the City boundaries will be prepared. 24.8

We also recommend that the Draft Plan state as implementation for a superb and successful urban riverfront that negotiations be entered with the County to assure that river-fronting County lands will be dedicated to the goals of the urban riverfront. 24.9

We also recommend that the **aesthetic component** of environmental impact be more carefully addressed by the DEIR and Draft Plan. The relocating of Soscol should be considered (perhaps to align with Burnell and McKinstry) as the flood plan reduces the available land on the Soscol side of theThird Street river gateway and makes Soscol, with its traffic and commercial uses inappropriate to the urban riverfront, almost the front door to the riverfront. 24.10

The DEIR and Plan should mitigate for transportation and parking challenges in the urban riverfront district by stressing more strongly in policy, goals, and implementation, the development of excellent pedestrian linkages between CWFA, Expo, Wine Train, and downtown; free short-range shuttle buses, and docking for small private and commercial transportation boats. 24.11

C: SPECIFIC ADDITIONS AND CHANGES

Items not found in the General Plan

1) Map of Riparian Corridors
2) Map of Creeks
3) Map of flood plain
4) Map of floodway

24.12

5) Implementations on Land Use policies 9.1 thru 9.6, Health and Safety-3.1 thru 3.9, Natural Resources-2.1 thru 2.3, 4.1 thru 4.6.
6) Open Space designation
7) Land Use designations that would establish the desire for a "linearparkway" along the Napa River (Introduction to Draft General Plan page 4).
8) Napa River Subject Area Element

Land Use Chapter 1

24.13

LU-6A The City shall prepare a plan including land use goals, a business incentive program, and design guidelines to promote high quality private and public development and redevelopment in the downtown. The plan should address design alternatives that would better incorporate the Napa River as a commercial, recreational, and **natural resource/environmental/cultural** focus for downtown.

24.14

LU-9.2 The City shall continue to apply special development standards to proposed development with in **1/4 mile of** the following areas:
a. Riparian corridors and wetlands
b. Hillsides
c. Critical wildlife habitat; and
d. Agriculture land outside the RUL.

24.15

LU-9.3 The City shall **require** the maintenance of wildlife corridors and **prohibit** the fragmentation of large natural plant communities when environmentally sensitive sites are developed, **or mitigate such fragmentation with science-based corridor plans between resulting habitat clusters and to other wildlife corridors**.

24.16

LU-9.4 The City shall **discourage development in high priority** environmentally-sensitive areas and **encourage** cluster forms of development **near other natural resources.**

LU-9.5 When proposed development within the density ranges prescribed by the underlying land use designation is inconsistent with conservation of critical environmental resources, the City Council **shall** reduce the project size, scale, or density (to less than the minimum density) provided the City Council makes one or more of the following findings:... 24.17

Natural Resources Chapter 7

Major Natural Resource objectives page 7-1

ADD *Maintain a Living Napa River (see glossary)*

Glossary

Living River

A "living" Napa River and its tributaries is a river system with structure, function, and diversity. It has physical, chemical, and biological components that function together to produce complex, diverse communities of people, plants, and animals. The health of the entire watershed, from the smallest headwater trickle on the slopes of Mt. St. Helena to the broad expanse of the estuary, is the summation of natural and human activities in the basin and how they affect certain undeniable physical processes common to all river systems.

A "living" Napa River system functions properly when it conveys variable flows and stores water in the flood plain, balances sediment input with sediment transport, provides good quality fish and wildlife habitat, maintains good water quality and quantity, and lends itself to recreation and aesthetic values. A "living" Napa River conveys equilibrium and harmony with all that it touches and resonates this through the human and natural environment 24.18

Page 7-2 WETLAND HABITAT

....Wetland preservation and maintenance **shall** be designed as part of new development projects and public works projects (e.g. flood control). 24.19

Page 7-4 POLLUTION

(add) **The City shall consider wetland construction for the treatment of urban surface runoff.** 24.20

Natural Resources-1.3 The City shall ***require*** the planting of native plant species in natural habitats. 24.21

Natural Resources-1.4 The City shall review all future waterway improvement projects (e.g., flood control, dredging, private development), as well as all projects that are within **300 feet to account for flood dispersal areas and wetlands** of the waterway, to ensure that they protect and minimize effects on the riparian and aquatic habitats. The City shall also ***require*** native plantings along the river and creek banks to stabilize the banks, reduce sedimentation, reduce stormwater runoff volumes. Native plantings ***increase between-storm stream flows through greater recharge*** in the adjacent floodplain, provide valuable wildlife habitat throughout the year. and enhance aquatic habitats.

24.22 ADD

a. *Provide tree cover along streams to provide shade for the stream, which protects fish habitat; decreases in-stream growth of vegetation (such as willows and tulles) that may block flow in wet months; decreases water temperature; decreases evaporative losses of water; decreases algal bloom and subsequent eutrophication in dry months; and increases property value.*

b. Enhance riparian cover that is contiguous across property lines to increase both wildlife habitat and real estate values.
c. Provide streams with access to their flood plains where possible. Where streams are heavily incised, flood plains would be redeveloped beside the new channel at the new, lower elevation.

24.23 Natural Resources -1.6 The City shall require as a condition of approval that development provide protection for significant on-site natural habitat . **STRIKE whenever possible. If such habitat cannot be avoided without loss of any economic use of the land, the City would permit equivalent mitigation off-site.**

24.24 Natural Resources-1.10 The City shall pursue appropriate new management practices for reducing the impact of pollution from urban activities, **including the construction of wetlands to trap and biologically treat urban runoff before release into waterways.**

24.25 Natural Resources-1.12 The City shall **develop and adopt mandatory guidelines to increase** the use of permeable or semi-permeable materials for parking lots and the off-street paved areas.

Page 7-4

Habitat Corridors:

.....Two ways of establishing habitat corridors are: 1) developing inter and inter-city habitat open space green belts on public lands and habitat open space easements on private land with the participation of the Napa County Land Trust; and 2) obtaining habitat open space easements. **ADD *during the subdivision process.*** 24.26

Aquatic Recreation:

.....An enforceable maximum speed limit of five miles per hour and **ADD** a ***no wake zone*** north of the County's boat launch at the end of Cuttings Wharf Road **north to navigable limits**.....

Page 7-5 Implementation Programs

Time frames are FY 02-04 these are too long. Too much damage could be done by then to the riparian habitats. 24.27

Chapter 7 Natural Resources

Groundwater Page 7-8 **ADD**

Groundwater recharge is important to maintain between storm levels in creeks and tributaries to the Napa River. Recharge occurs by maintaining the floodplains, limiting impermeable surfaces, and by collecting runoff in detention basins and swales. 24.28

Page 7-9

NR-4.3 The City shall support the monitoring and assessment of the effects of dredging in the Napa River. **ADD *Assess the effects of dredging on water table for depletion and salinity.*** 24.29

NEW POLICY And/Or "Mitigation"

NR-3.4 Actively encourage and educate landowners in implementing watershed management practices in the NCRCD Owner's Manual . 24.30

NR-4.7 *Replenish groundwater by discouraging impermeable surfaces, using detention basins and swales to improve quality and quantity of groundwater.(see N.R. 1.12)* 24.31

NR-4.8 No creek shall be forced underground or be covered.. 24.32

NR-4.9 Parks, golf courses, cemeteries and playing fields should adopt low pesticide and fertilizer use management techniques to eliminate tainted runoff into drainages.(see N.R.-1.10) 24.33

NR-4.10 The City shall support the maintenance of a geomorphically stable river that will not create abnormal sediment deposits (as is being developed in the current flood management plan). 24.34

Chapter 4 Community Resources

Storm Drainage

24.35 **ADD** Policy CS-*11.10*

Creeks should not be looked upon as stormwater runoff channels. No creek should be required to carry more runoff than predevelopment.

Introduction

24.36 Page 16

Strike ....would virtually eliminate flooding in the central city.

Add to section on flooding in Chapter 8 page 8-9

24.37 The 1993 floods in the mid-west has brought about a new policy supported by the Army Corp of Engineers that of Floodplain Management. The Corp along with other experts in the field of hydrology warn that trying to predict the plain of the 100 year flood is not possible due to the lack of information over time and the changes in the variables within the floodplain e.g. development. Flood control projects have given cities a false sense of security, additional building in the floodplains and floodways overrides the purposes of the initial project. No flood control project will ever protect Napa completely. To minimize economical losses from flooding in the floodplain, the city might choose to place more openspace in this area. Lower floors in buildings should be above the floodplain or be floodable. Buildings should not act as floodwalls raising flood levels on adjacent properties or restricting the flow in the floodway.

Chapter 8 Health and Safety

Flooding

24.38 All the HS-3 policies should be re-evaluated to correct inconsistencies. For instance, some policies concern themselves with the protection of residents and property owners from the hazards of development in the floodplain and other policies seem to encourage development in the floodways and floodplains.

24.39 HS-3.2 The City shall continue to apply flood plain management regulations for development in the floodplain and floodway, **and require that new development show how it will affect downstream flows and flood potential.**

24.40 HS-3.6 The City shall support **STRIKE** (alternative) programs and methods to reduce the flooding of the Napa River and its tributaries **in a manner that attempts to prevent damage to natural resources while providing the most cost-effective solutions.**

Add Policies and/or Mitigation measures

Policy H.S. 3.10 Flood control channels should be kept in functional condition. Where possible, tree cover on channel banks should be used to control in channel growth of vegetation. 24.41

Policy H.S. 3.11 The City shall assist homeowners and businesses in the floodplain with floodproofing their property. Assistance could be in the form of applying for grants to facilitate the floodproofing, low-interest loans, property tax breaks, labor, organizing volunteer work parties etc; 24.42

Policy H.S 3.12 The City shall assist property owners to locate out of the floodway and the floodplain. 24.43

Policy H.S 3.13 No property owner in the floodplain of the Napa River or a tributary will be allowed to add fill to their property. 24.44

Respectfully submitted,
December 2, 1996

Moira Johnston-Block
President
Friends of the Napa River

APPENDIX E

Friends of the Napa River

The Landmarks Building
1026 First Street • Napa, CA 94559
Phone (707) 255-8646 • Fax (707) 255-2164

For Release April 12, 1996:

DEC 1996

INTERIM GUIDELINES FOR THE CITY OF NAPA'S URBAN RIVERFRONT

These interim guidelines are a work-in-progress prepared in response to urgent community need. They are a set of guiding principles, voluntary and advisory for now, for everyone, public and private, involved in the development and restoration of Napa's urban riverfront. They are an attempt to forge a cohesive articulation of the vision, growing for several decades, of restoring Napa's scarred river to vibrant health and returning Napa's downtown waterfront to the hub of dynamic activity it was -- the heart of a revitalized river district which will bring huge economic, cultural, and recreational benefits to the entire Napa Valley as well as to visitors. As planning for the first exciting projects (Center for Wine Food and the Arts, Hatt Marketplace, Noyes Lumber site) moves ahead, as a sensitive and beautiful flood control project emerges, as downtown improvement initiatives proliferate, we need a common language for the urban riverfront *now. Successful river cities have guidelines.*

24.4

The design and development professionals and urban river stakeholders who contributed to these guidelines drew on a rich legacy of ideas: the Roma and Sasaki plans, the City's River Trail, Renaissance Napa, and myriad community efforts. It drew on the experience of many other river cities, from San Antonio to Portland, which have already learned the potent power of a river as a revitalizing force. We have the potential to be the national model for urban rivers, but we must do it right. These guidelines are a starting point, to be further developed to a professional level, then adopted by the City Council, and integrated into an urgently-needed specific plan for the downtown river district and into the new General Plan. These principles will, we hope, be embraced by the community, by landowners/developers along the river, and in public policy, zoning, and development standards. Emerging in tandem with the community's alternate flood management plan, they will, we hope, encourage wonderful, quality projects along the river.

We urge the City to encourage and expedite projects sensitive to these guidelines, and to discourage projects that are not. The guidelines apply with or without flood control. Like the living river, this is a living document; comments are welcomed.

* * * * * *

Contributors: Moira Johnston Block - Guidelines Chair, Juliana Inman, Karen Rippey, Dorothy Lind, John Whitridge, Vince DeDomenico, Mike McKaig, Barbara Stafford, Harry Price, Bill Bylund, Chuck Shinnamon, Liesel Eisele, Farnum Kerr, Dick Williams, Philip Vandetoolen, John Clifton, Tony Norris.

APPENDIX E

GUIDELINES FOR CITY OF NAPA'S URBAN RIVERFRONT:

The goal of these guidelines is to guide the community to achieve a unique urban riverfront which: 1) will be a festive, vibrant, and compellingly attractive locus for public gathering which reflects the spirit and nature of Napa Valley, 2) maintains and restores the Napa River as a healthy, living river, and captures the magic and beauty of the river, and 3) brings, as a by-product of those two goals, broad-ranging and enduring social and economic benefits to our entire Napa Valley community.

General Character:

: The urban riverfront is defined, here, as from the north end of the Oxbow to south of the Hatt Building, with the lower reach of Napa Creek and a proposed bypass included.

: The health and biological diversity of "the living river" must be consistently maintained as the river co-exists with the human community along its banks.

: The urban riverfront should be a lively, festive, and attractive public gathering place for cultural, commercial, and recreational uses that reflects the friendly, historic, 'village' quality and scale of our city and riverfront. All architectural, landscaping, and design elements should enhance and support that.

: All projects should be oriented towards the river, acknowledging and enhancing both the river and Napa Creek. The river is not the back door. The river 'door' should receive equal or greater design attention than the street 'door.' Service and utility uses should be avoided on the riverfront.

: Linkages are vital, creating connections between the riverfront , the waterway, and the surrounding community. Linkages are important, too, in achieving the vision of a multi-mode transportation system of linked river ferries, an extended train system, shuttle buses to upvalley, and a network of pedestrian pathways which would benefit the entire Napa Valley by reducing automobile use in this fragile agricuitural valley.

: Buildings: Architecture and building materials should be reflective of and sympathetic to the several historical architectural styles and structural forms of the Napa Valley. The imposition of a single building theme or style along the entire length of the waterfront is not recommended; rather, the design of new development should be scaled and detailed in a way that complements the historic character and role of Napa's riverfront, without resorting to contrived or overly thematic approaches that could soon become outdated. This does not exclude fine contemporary architecture, if 'spirit', landscaping, and materials are compatible with neighboring riverfront and habitat integrity.

24.45

: The River Corridor and the continuous River Trail are the unifying features of the urban riverfront, a unity which should be achieved by the cohesive 'look' and flavor, the aesthetic spirit, of the riverbank, trails, decks and promenades and by a consistency of materials and design (in common elements such as surface, lighting, trail "furniture", guard rails, trees and plantings). The Trail through the urban riverfront would connect people to the more pastoral river trail to the north and south which would offer a variety of recreational experiences -- wetlands, sports fields, fishing sites, equestrian paths, for example.

: This is a pedestrian area, requiring a critical mass of people to be successful. Development designed to the criteria and in the spirit of the 'urban riverfront' should be concentrated within its defined boundaries and not be permitted to sprawl and leapfrog beyond them, as it would do three negative things: create a 'commercial strip' not unlike the faceless, town-destroying automobile strips of America; dilute the needed concentration of pedestrian traffic; and 'eat' into the green belt open space which must also be developed and preserved along the river. These goals must be achieved and controlled through zoning and the General Plan.

: Open space. A percentage of each project should be devoted to open space -- spaces which invite a meandering flow and clustering of pedestrian traffic, with visual surprises, seating areas, river vistas, focal 'gathering spots' (fountains, sculptures, etc.), shade trees, cafe decks, flower baskets, banners, color in flowers and plantings, etc.

Specific Guidelines for Use and Design:

(These can only be preliminary approximations until the flood control design is complete, and until a more rigorous, detailed and professional set of development criteria can be prepared with guidance of City staff)

: All structures and improvements should be designed, sited, constructed and maintained to anticipate that flooding *can* occur with or without the 100-year flood protection which is the goal (the 101-year event happens!). Inexpensive flood-proofing and floodable ground floors, plazas, and landscaping should be incorporated.

2445

: Access: The community must have access, both physical and visual, to the river and River Trail through buildings, corridors, arcades, and walkways from street. Access pathways should be treated as elements of the riverfront, with landscaping and attractive and inviting architectural treatment. There must be pedestrian linkages to the surrounding neighborhood -- to downtown, the Center, the Wine Train, Expo, etc., perhaps including a pedestrian bridge over the river at some point. Bicycles and boats could be part of the 'people moving' system; in Seattle, city-owned bikes are available on the street, free, for anyone to use. Fences should not block access and should be subject to the same general design criteria as buildings.

: Safety and maintenance should be, primarily, the responsibility of owners and tenants, and provisions for both must be built into design of buildings and landscaping to assure an ongoing quality experience. Public access and easements may also require City involvement in control, maintenance, and enforcement policies. For example, the River Trail, which will probably be defined by a public easement, may well be a City responsibility. Since private

owners are encouraged to give public access to the river and River Trail, a public/private partnership for safety and maintenance makes sense.

: Signage, lighting, and sound: Should be sensitive to and reflect the nature of our charming, historic, small town riverfront. Commercial name-brand neon signs should be controlled. Amplified sound should be controlled by decibel standards.

: Setbacks: A complex and controversial issue which cannot be rigidly fixed at this time, but which must, 1) be integrated into the emerging flood management design and, 2) reflect the best current materials, design technology, and biological standards for a built environment which will protect the living river and respect natural river dynamics (point bars, bankfull state, erosion, etc). In some areas, sloped and widened banks, and substantial setbacks may be the solution; in those few, short reaches where the banks have already been severely modified and impaired and where 'hardscape' may be required, it may be river-friendly floodwalls, cantilevering and even piles. Setbacks should accomodate River Trail, decks and promenades. A range of setbacks is possible, given current techniques for bank treatments that protect habitat, contain erosion, preserve water quality, and respect the river's hydrology. The setback for each project will have to be carefully evaluated for river health and compatibility with neighboring projects. Setbacks that create varied experiences along the river (plazas, courts, stepped levels, stairs to river) are encouraged.

24.45

: Quality, sensitivity, and compatibility are the bywords for buildings.

: Historic restorations should be done with integrity and authenticity. Refer to: Secretary of the Interior's Standards and Guidelines for Rehabilitating Historic Buildings.

: In single-use projects such as hotels or larger restaurants, monolithic walls and facades are to be avoided. Encourage pedestrian access with visual interest, flow and ambience into and through structures.

APPENDIX E

: Materials reflecting Napa's traditions should be encouraged -- *real* stone, brick, wood, etc. Discourage large expanses of glass, especially reflective glass, and overuse of concrete, for example.

: Development Massing: New development should preserve the rhythm and scale of the historic existing buildings and of nearby Main Street. Density should be varied, with clustered commercial next to open river vistas.

: Uses: Diverse multi-use is envisioned for the urban riverfront. The current Tourist/Commercial land use designation is scheduled to be changed to Mixed Use in the City's new General Plan. Appropriate uses are those compatible with a variety of tourist/commercial/retail/cultural/ residential/social/ recreational purposes of both visitors and residents, tourists and Napans, of all ages.

: Residential living space 'above the store' should be encouraged as part of the dynamic mix of uses perceived for developments. Young working couples, retired, and seasonal residents would bring year-round, round-the-clock vitality to the riverfront district.

24.45

: Cultural uses should be encouraged. The presence of the American Center for Wine, Food and the Arts, Jarvis Conservatory, Opera House, Main Street galleries, and annual River Festival with the Napa Symphony create a cultural nexus which could be expanded, for example, with a riverside ampitheatre (Veterans Park is one suggested site), public sculpture, street performers, artists studios, art galleries, open-air concerts, more well-done historic wall murals. The City might establish a "cultural arts district" overlaying the riverfront district, as Eureka has done.

: Retail shops should be of an intimate, quality nature appropriate to a world center of wine, food and good living and yet offer some 'real life' services that will make it attractive to Napa's families as well as to tourists. An indoor, year-round farmer's market would be an excellent element (Vancouver, B.C.'s Granville Island and Seattle's Pike Marketplace are successful examples). Restaurants and cafes of high quality and diversity are encouraged.

: Examples of inappropriate uses: Fast food chains, convenience stores (7-11s), single-use office or institutional buildings, industrial uses, low-end factory outlets.

: Banks and Landscaping. Although the short urban reach of the river will, with flood control, be somewhat modified from its natural state and configuration, all efforts should be made in landscaping to restore and enhance the natural living quality of the river's edge through native plants endemic to the Napa River, and wildlife and fish habitats. This will give continuity to the river corridor and ensure a healthy riparian environment; optimally, a continuous necklace of reeds and other emergent plants at the water's edge protects fish from predators. This is an urban river, however, and landscaping of buildings and plazas need not fully recreate a natural riverbank. In those short reaches where a hard edge cannot be avoided, innovative, more natural solutions should be utilized for bank stabilization. Displays of color are appropriate, particularly at key entry points to the river corridor and at linkage points to other greenways. Exotic plant material that is documented as being invasive, alleolopathic or otherwise overly competitive shall be exluded from the landscape. Sites shall be protected from erosion during construction, and existing trees protected, where appropriate. Topsoil native to the site shall be used in landscaped areas, if possible. Proper drainage must be designed.

24.45

: Parking: Parking lots should not front on the river. If possible, no surface or stacked parking should be on the river-side of Soscol or Main Street. Well-designed parking structures which blend into the river district may have to be built a block or two back from the riverfront. Where parking can be accomodated on site, it should be basement or depressed parking, where feasible. The City should be encouraged to work with developers to find off-site parking locations, and Redevelopment might assist the first developers with financing.

: Use the river as a waterway, building small docks (floating, or best technology available) for small shuttle boats and private boats, where possible, to make the river a dynamic link in the transportation system as it was historically. The concept of 'coming to lunch by water' should be integral to the concept of the riverfront. San Antonio's very popular use of small pontoon boats to shuttle people to several designated stops along the River Walk could be adapted to

the Napa River. There is much enthusiasm for a ferry service from San Francisco and/or other points on the Bay. Because of the hours it takes to motor by boat to downtown Napa, facilities should invite it being a boater's destination for an overnight stay. At least one small 'safe harbor', perhaps at the site of the historic wharf south of the Hatt Building, is encouraged. No-wake speeds and engine noise on the river will be strictly controlled north of Kennedy Park.

: Maximum height for riverfront structures: 3 floors or 45 feet. No more than two floors on river-facing facade. Step backs required for buildings taller than two stories. Consideration will be given to special architectural elements which may exceed 45 feet, on a case-by-case design quality basis. These standards should be reevaluated when the final flood control design is complete.

: Water runoff: Runoff from new development should be impounded and released at a rate of discharge equal to the rate of discharge from the undisturbed site. Use the most practical, technologically-best solution for controlling runoff flows.

24.45

: New bridges should be beautifully designed, reflect the valley's famous traditional bridges, and have open views of the river through railings. Because of the visual prominence of bridges in the riverfront project, bridge design competitions are encouraged.

: Projects must accomodate maintenance activities appropriate for an urban/riparian interface environment.

: Absent any formal evaluation mechanism at this time, project evaluation could be done by an ad hoc Urban Riverfront Project Evaluation committee of competent professionals, in addition to City staff and the Planning Commission.

Welcome Back to the River!

25.

Friends of the Napa River

GENERAL PLAN COMMUNICATION #25

The Landmarks Building
1026 First Street • Napa, CA 94559
Phone (707) 255-8646 • Fax (707) 255-2164

DEC

FROM: FRIENDS OF THE NAPA RIVER

TO: THE CITY OF NAPA, CALIFORNIA

RE: ADDITIONAL WRITTEN COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT AND DRAFT GENERAL PLAN POLICY DOCUMENT

December 2, 1996

1: NOTE: We did not receive the missing statement on Page 2-10 of the DEIR in time to incorporate our comment into Friends' Written Comments, delivered to you today. However, I would like this brief comment below to be attached to Friends' comments.

: Under Economic Development section, DEIR Page 2-10, the last sentence should be changed to read: In its efforts to foster this economic development and to reduce the amount of commuting to and from the city, the Draft General Plan calls for attraction of higher paying technical and professional jobs, encouragement to business sectors that contribute significantly to the City's fiscal health (such as Auto Row), strengthening the physical connection between **Downtown, Old Town, the Center for Wine Food and the Arts, and the entire Urban Riverfront district from North end of Oxbow to South of Hatt Marketplace, and promotion of the downtown -- with the Urban Riverfront as its centerpiece --** as a 24-hour destination serving as a key element in the City's tourist economy, as well as the City's regional/local/retail/administrative center.

25.1

2: The City's Flood Control Plan, or Flood Management Plan as it is called by the Community Coalition, has already been addressed in our Written Comments, but we wish to add that the impacts of Flood Control on growth and development must be much more specifically and carefully addressed in the Draft General Plan as directed by the DEIR's 4.3 (Chap 4, p 4-1), Growth-Inducing Impacts, because Flood Control has a direct growth-inducing impact. Our concern, as stated earlier, is that flood control is viewed primarily by the City as an opportunity for development in the floodplain -- a very complex, challenging and questionable goal demanding thoughtful treatment in the Draft Plan. .

25.2

Thank you,

Moira Johnston Block,
President

8 26.

GENERAL PLAN COMMUNICATION # 26

moira johnston block



December 2, 1996

Planning Department
City of Napa

Re: Written Comments on DEIR for City of Napa Draft General Plan

Dear Mr. Yost and Ms Faaborg:

I wish to submit a personal written comment:

: Re: DEIR #3, page 3.6-4: The DEIR states a General Plan policy of protecting hillsides on environmental grounds, as both an open space resource and as an aesthetic visual resource (DEIR p 2-10, p 4-5) -- in addition to erosion and watershed management issues. **I strongly oppose the plan to permit development in the 13 acres west of Foster Road.** The rationale that development on those highly-visible hillside acres will not have any negative viewshed implications is a spurious one, indeed. It argues that because one serious mistake has been made, that mistake justifies another. The views of the beautiful hills on the southwest side of Napa, an important part of the visual gateway to the valley, have already been disastrously compromised by the development permitted in the past, right up to and including the ridgelines. An additional 13 acres of housing on steep hillsides, clearly visible from Highway 29, the main entry artery to Napa Valley, will only exacerbate the terrible visual damage already done. **The negative impact is not mitigated.**

26.1

Thank you,

Best regards,

Moira Johnston Block

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APPENDIX E

Sierra Club Napa County Group
PO Box 644
Napa, CA 94559

GENERAL PLAN COMMUNICATION # 27

SIERRA CLUB

December 2, 1996

John Yost, Planning Director
City of Napa Planning Department
P.O. Box 660
Napa, CA 94559

Dear Mr. Yost:

Attached please find the Sierra Club Napa County Group Written Comments on the City of Napa Draft Environmental Impact Report and Draft General Plan Policy Document *Envision Napa 2020*. This document supersedes our comments dated November 18, 1996, rendering them null and void.

These comments represent our values and goals, and provide options for responsible and successful development of the City of Napa. We have achieved this through a critical analysis of the General Plan, the mitigation measures therein, and potential impacts as described in the Draft EIR and as illustrated by us. We believe that the changes we offer to you provide a good foundation for smart development that protects and utilizes our natural environment to make Napa an even better place to live.

We appreciate the opportunity to provide our written comments and look forward to continue working with you in our effort to ensure that the Draft EIR and General Plan protect our rich natural resource heritage while enhancing our quality of life.

Sincerely,

Anthony Norris, Chair
Sierra Club Napa County Group

DEC 1996

APPENDIX E

SIERRA CLUB NAPA COUNTY GROUP

WRITTEN COMMENTS ON THE CITY OF NAPA DRAFT ENVIRONMENTAL IMPACT REPORT AND DRAFT GENERAL PLAN POLICY DOCUMENT *ENVISION 2020*

APPENDIX E

APPENDIX E

TABLE OF CONTENTS

Page

I. INTRODUCTION 1

II. THE DRAFT EIR COMMUNITY INPUT PROCESS IS FLAWED 3

III. IMPACT IDENTIFICATION AND ANALYSIS IS INADEQUATE, AND MITIGATION MEASURES ARE OFTEN VAGUE 3

A. LAND USE 3
B. TRANSPORTATION 9
C. COMMUNITY SERVICES AND UTILITIES 12
   a. Police and Fire 12
   b. Water Supply 12
   c. Trail Development 13
   d. Visual Quality 14
D. AIR QUALITY 15
E. BIOLOGICAL RESOURCES 15
F. GEOLOGY, SOILS, AND SEISMOLOGY 18
H. HYDROLOGY AND WATER QUALITY 19

IV. CONCLUSION 20

APPENDIX E

APPENDIX E

SIERRA CLUB NAPA COUNTY GROUP WRITTEN COMMENTS ON THE CITY OF NAPA DRAFT ENVIRONMENTAL IMPACT REPORT AND DRAFT GENERAL PLAN POLICY DOCUMENT *ENVISION 2020*

I. INTRODUCTION

The City of Napa now has a decades old heritage of protecting its open space, with gusto. This effort has provided all of us with world famous agriculture, charming vistas, protected enclaves of native animal and plant species, recreational activities, the beauty and bounty of the Napa River, and a strengthening community will to improve on our heritage. The Draft General Plan (DGP) and Draft Environmental Impact Report (DEIR) should speak to our desire to protect and enhance our natural environment while improving our quality of life. While some aspects of these documents are commendable, they generally fail to provide real guidance toward a healthy community for the next 25 years.

The DEIR is fundamentally flawed in that it attempts to address a project that is unstable and poorly defined. It leaves those preparing the DEIR to struggle and address potential impacts of plans that have not yet been solidified. A DEIR cannot represent a good faith effort to analyze potential project impacts when the project (DGP) is vague and inconsistent to the point that it is rendered virtually meaningless as a guiding document.

The DEIR text on one hand claims to maintain the RUL over the next 25 years but then proposes over 440 acres of new annexations be added immediately. Amazingly, the document then establishes a mechanism for allowing unlimited annexations over the next two decades without the requirement of even a general plan change. Other contractions include a proposal to ensure paced growth, though no system is established to do so, a proposal to establish "permanent greenbelts", though no implementation program is proposed to accomplish this, and a proposal to protect wetland habitat but allow developers to fill wetlands providing they agree to attempt re-establishment elsewhere.

Some mitigations in the Draft General Plan are actually plans to determine impacts or adopt policies at a later date. For example, Policy NR-4.4 states "The City shall adopt standards and regulations for the reduction and/or elimination of the nonpoint sources of pollution." However, Public Resource Code §21002 and §21081 and California Environmental Quality Act Guidelines §15002 and §15091 state that mitigation measures cannot be developed at a later date. This was supported in the court case *Sundstrom v. County of Mendocino.* This Draft Environmental Impact Report's attempt to identify and analyze impacts of mitigation measures yet to be developed make it, from the outset, inadequate.

The Draft General Plan, which contains all of the mitigation measures for the Draft Environmental Impact Report, has not been adopted. The mitigations, at this point, have no validity.

Any substantial changes to the current Draft General Plan will require that the Draft Environmental Impact Report be revised and once again be made available for public review and comment.

Also, we find the DEIR confusing with so many cross references. In the California Environmental Quality Act Guidelines §150 it states that this document must be understood by the reader without the need of undue cross reference. The California Act was modeled after the National Environmental Policy Act, and it states that in *Baltimore Gas and Electric Co. v. Natural Resources Defense Council*, an EIR should be essentially a self-contained instrument. This DEIR references numerous documents, including the Draft General Plan, the Background Document, the Fiscal Analysis, BAAQMD CEQA Guidelines, the Water System Optimization and Master Plan, the Airport Land Use Compatibility Plan and Policy Resolution No. 27.

II. THE DRAFT EIR COMMUNITY INPUT PROCESS IS FLAWED

27.1

The General Plan review process chosen by the City initiates an environmental review of an incomplete Draft General Plan (DGP). Major issues, as identified by the Draft Environmental Impact Report (DEIR), still remain. They include developing the floodplain, the extension of the Rural Urban Limit (RUL), a higher density housing infill strategy, and growth management measures. (p. S-4.5). The City of Napa (City) must arrive at a stable and definite project (DGP) before a valid environmental review may be conducted. The DGP process could have included an effort to address and/or resolve these issues before conducting the environmental review. Without this, the DEIR cannot identify and mitigate for potential project impacts. For example, the DEIR does not address the impacts of floodplain development without a flood project, although the intent of the DGP is to allow development in this area, with or without a flood control project (HS-3.9, LU 9.6, p. 1-21 objective #4).

III. IMPACT IDENTIFICATION AND ANALYSIS IS INADEQUATE, AND MITIGATION MEASURES ARE OFTEN VAGUE

The DEIR makes some attempt to identify impacts, but makes no attempt to analyze them. Usually the reader is expected to except the City's assertion that all mitigations in the DGP prevent any significant adverse impact of implementing the preferred alternative of the DGP without supporting data. At times there are contradictions between the DEIR and the DGP.

The following are the Sierra Club's detailed comments on major portions of the DEIR that should be addressed during the environmental review process.

A. LAND USE

Land use policies are not specific enough to serve as mitigations.

Many of the policies that the DEIR considers adequate to fully mitigate project impacts are not specific enough to do so. For instance, DGP policy LU-3.2, which suggests an agricultural setback be provided "between residential uses on the periphery of the RUL and productive agricultural land outside the RUL," provides no description of this setback. (p. 1-11). Further, no implementation program is listed to ensure the measure is ever undertaken.

27.2

Policy LU-9.2 will apply "special development standards to proposed development within or adjacent to" sensitive areas. (p. 1-21). What are these special standards? Not only does the reader of the DGP and DEIR already have to read a plethora of outside documents, but this policy incorporates mystery standards at mitigation for the DGP. The DGP must plainly state to what standards Policy LU-9.2 refers.

Standards of significance are inadequate and findings of insignificance are not supported.

The basis for findings of significance with regard to the Stanly Ranch are flawed or nonexistent. The DEIR fails to adequately analyze the substantial alterations in type and intensity of land use proposed for the Stanly Ranch. The DGP indicates that there is a proposal to develop Stanly Ranch as a destination resort "comprising of 300 lodging units, with conference, meeting room, and related facilities. An 18 hole golf course and clubhouse with recreational amenities are also planned." (p. 1-7). Also included in the plan are 550 homes and a commercial wine center. It provides for a Floor-Area-Ratio (FAR) of 0.50, but potentially up to 1.0. This proposal is clearly not in keeping with the character and identity of the surrounding area. It is wholly inappropriate for development on the fringe of the RUL. Such development would remove high quality vineyard land from use, generate substantial traffic, increase water runoff due to construction of impervious surfaces, and assault the visual aesthetics of the area.

The DEIR defines conversion of "economically viable important farmlands to nonagricultural uses as a significant effect" and clarifies that loss of "small agricultural plots not on prime agricultural soils when contiguous with urban development is considered adverse but not significant." (p. 3.2-3). But then the document finds the loss of agricultural land at the Stanly Ranch, a noncontiguous parcel used for both premium grape growing and cattle grazing, insignificant.

27.3

The relative change in intensity of land use at the Stanly Ranch and its impact on the character of the neighboring area are virtually ignored in the DEIR. The text of the DEIR further explains that uses causing significant impacts are described as those that would "substantially alter the type or intensity of land use on a proposed site, causing it to be incompatible with surrounding land uses or the overall character of the surrounding neighborhoods." (p. 3.2-3). The DGP would allow an island of significant urban development in the largest open space area within the RUL. It is a violation of Goal LU-2, Policy LU-2.2, to "support Napa County's agricultural and other resources uses," and to ensure that "... land outside the RUL is conserved primarily for agriculture ... ." (p. 1-10,11). The Stanley Ranch development will put additional market pressure and upward land values on adjacent vineyard lands, creating a dangerous situation conducive to further RUL expansion and vineyard conversion to housing tracts. This in tun would further violate Goal LU-1, and would be in general contradiction of the stated objectives of the DGP. Furthermore, this island of urban development is leap-frog development within the RUL. It would deliver added financial incentive to pave over land between the Westwood and Central Napa Planning Areas and the Stanley Ranch. This area is vital for its grazing, wetland, flood control, aesthetic, and visual gateway characteristics, Although Table 2-3 (p. 2-14) of

the DEIR indicates residential development would increase by 60,000% at the Stanly Ranch, the relative impacts of this land use change is simply brushed aside as insignificant.

27.3 Stanly Ranch is located in the Carneros Region, a world renown grape growing appellation. Its vineyard land ought to be recognized as some of the most valuable in existence. The DEIR disregards the loss of this agricultural land by suggesting it be viewed in the context of "the greater Napa Valley" and suggests that Class I and II soils are the only lands suitable for local agriculture. But small vineyards of unusually high value are located on other classes of soils throughout the region. Many Napa Valley vineyards, though small in the context of the greater Valley, are of critical value to businesses functioning in the local premium wine industry. Their significance cannot be measured simply by acreage or general soil class. The assigned land use designations for Stanly Ranch-- Single Family Residential, Tourist Commercial, and Single Family Infill -- are in direct opposition to Goal LU-1. Specifically, they do not recognize the importance of this historic grape growing district as required by Policy LU-1.4.

27.4 In another example of unsupported conclusion, the DEIR makes a finding of consistency with the Airport Land Use Compatibility Plan (ALUCP) without any justification. The DEIR then suggests that review of the DGP by the Airport Land Use Commission (ALUC) would mitigate project impacts. Even though the Airport Land Use Commission (ALUC) has yet to comment on the City DGP, the DEIR asserts that land uses will be "restricted" and "safety standards imposed" in accordance with the ALUCP. In reality, ALUC review cannot assure any mitigation occurs. The DGP specifically states that the ALUCP plan may be overridden by the City through a simple procedure.

27.5 The DGP land use designations of the Stanly Ranch would specifically allow conversion of this viable agricultural land to urban use. The finding of insignificance therefore has no basis. Although many explanations are provided to try to justify this finding, including that the proposed land use pattern "is an expression of the collective vision of the community," we find this conclusion confusing since the Citizens Advisory Committee on the General Plan Update was unable to reach agreement on many land use issues such as Stanly Ranch development. The Planning Commission and City Council have likewise not yet resolved these land use issues.

Impact analysis is not sufficient.

27.6 The DEIR in Land Use Section 3.2 states that within the Rural Urban Limit (RUL) "Usable acreage does not include environmentally sensitive areas or waterbodies since those areas are generally not considered suitable for development." (p. 3.2-3). This is in contradiction to the DGP, where in Chapter 1, page 1-1, it states that "This General Plan emphasizes Napa's commitment to containing urban development within the RUL. As a result, much of the new

development will occur within existing neighborhoods and in areas with sensitive constraints, (e.g. hillsides, floodplain)." The DEIR seems to preclude development in environmentally sensitive areas while the DGP allows this practice. Moreover, the DGP, on page 1-21, also allows "the reclamation of lands near the river for sensitive urban use." 27.6

However, the DEIR does not adequately address land use impacts within the RUL, or added RUL expansions. The Big Ranch area includes significant open space, native vegetation, flood control, and watercourse characteristics, yet impacts of the DGP on these beneficial uses and resources are not considered. The Stanly Ranch and proposed RUL expansion area west of Foster Road are even more sensitive. Each of these areas are the subject of preliminary land use proposals. The DEIR must fully address these current land use proposals and their potential impacts. 27.7

If the Big Ranch, Stanly Ranch, and Foster Road areas are to be developed, we request a specific plan be proposed and implemented for each of them.

To further the idea that development of agricultural lands within the RUL is not a significant impact, the DEIR states that this would be "... future development consistent with the land use policies of the General Plan and zoning." (p. 3.2-6). In *Environmental Planning and Information Council v. County of Eldorado (1982)* the court provided that environmental impacts cannot be compared to that of an existing plan, as the DEIR does here, but must determine actual impacts on the existing environment. Thus, the DEIR cannot not make a determination that development of agricultural lands within the RUL is insignificant just because the General Plan and current zoning allow it. The DEIR must investigate and analyze explicit environmental impacts. The DEIR will not be in compliance until that happens. 27.8

Impacts and growth inducing effects of the proposed RUL expansions are not adequately addressed.

RUL expansion would envelope 440 acres of property. The DEIR dismisses the impacts of the RUL expansion encompassing the Napa State Hospital, asserting that the grounds are already "urbanized". In fact, undeveloped portions of hospital land serve as a buffer between developed portions of the property and the adjoining Skyline Park and open area to the south. Though purchase of a 100 acre portion of the hospital property is the subject of negotiations between the State and private development interests, the DEIR does not consider the impact of more intensive use of the property that would be accommodated by its inclusion within the RUL. In fact, the City offers no justification for embracing these areas within the RUL other than a vague effort to "improve the area's defensibility". (p. 3.2-5). 27.9

27.10 Significant adverse impacts of including the 13 acre Foster Road area parcel are also not adequately addressed. The high elevation area is lacking in sewage, water, and safety services and is in a seismic hazard area. The City cites no legitimate benefit of including this area within the RUL.

27.11 The DGP Policy A-2.1 sets out criteria for expanding the RUL. (p. 9-2). But no effort is made to describe how these standards apply to the proposed RUL expansion areas. Additionally, the DEIR fails to consider and analyze impacts of more RUL expansions that would be allowed under this policy before the year 2020. Inclusion of this policy in the General Plan would allow an unlimited number of RUL expansions by the City Council on any Tuesday evening without the need for a general plan amendment. Furthermore, numerous parcels contiguous with the current RUL are already eligible for inclusion within the RUL, based on these criteria. The impact of these potential RUL expansions and the impacts of related growth and infrastructure and public service demands must be addressed by this EIR.

The growth rate projection and resulting impact analysis in the DEIR are not valid.

27.12 The DEIR asserts that the DGP incorporates a "confined city policy" to maintain the current RUL and establishes a "development pacing" strategy so that land within the RUL will be available for development throughout the 25 year planning period. Yet DGP policies contradict these goals. Policy A-2.1, described above, provides additional RUL expansion with no time restrictions. RUL expansions beyond those reviewed in the DEIR could begin immediately. Further, the DGP maintains that monitoring annual growth will let the City know when growth limits are needed, ostensibly so that steps can be taken to control it. However, no methods of limiting growth are identified by the DGP. Indeed, the document does not explain at what point growth might be deemed too rapid. Absent any expressed growth limit, the City cannot promise availability of land within the RUL over time. The DEIR is void of any consideration of the potential impacts of more rapid growth that may occur should favorable economic conditions develop. The growth rates analyzed in the DEIR therefore have no validity. We note that the 1996 ABAG projections show a growth rate that has already accelerated beyond the City's projections.

We request the following policy changes and additions.

27.13 ◆ Delete Policy A-2.1.

27.14 ◆ Abandon the proposed RUL extensions encompassing the State Hospital and area west of Foster Road.

- New Policy ____

  The City shall establish a new land use designation "Resource Area", or RA, for the dual purpose of protecting people and property from hazards and protecting important environmental resources from damage or degradation. Resource Area (RA) lands are areas where very low intensity development is appropriate. Conversion of RA lands for residential, commercial, industrial, or public facilities uses is generally not to be allowed. Resource Areas are lands with serious constraints to development characterized by sensitive wildlife habitat, vulnerability to floods, seismic, geologic, or other hazards. Jurisdictional wetlands, hillsides over 15% slope, wildlife corridors, cemeteries, rail lines, and lands noncontiguous with the rest of the City are zones appropriately designated RA. RA lands may be used for passive recreation, agriculture, and permanent greenbelt buffers at the edge of the City.

27.15

- New Implementation ____

  The RA designation shall be applied to the entire Stanly Ranch, Giovannoni peninsula, existing wetlands, and wetland mitigation sites on the Gasser Estate (Imola Avenue), steep hillsides of the Browns Valley, Rollingwood, and Alta Heights areas, Kennedy Park wetlands, and significant habitat and wildlife corridor areas along the river and its tributaries.

27.16

- New Policy ___

  The City shall, in cooperation with the Napa County Land Trust, establish a permanent greenbelt concept consistent with that presented in the Draft 1996 Napa County Airport Industrial Area Specific Plan with linkages to the City trails and wildlife corridors.

27.17

- New Implementation ___

  The City will identify and implement an open space/greenbelt buffer zoning. Greenbelt areas will be established at the edge of the City through conservation easements and/or land use regulations. The greenbelt will be regarded as a permanent area unavailable for development and will be designed to separate agricultural areas of the County from the urban zones of the City.

27.18

(policy changes and additions are printed in **bold** and <u>underlined</u>)

- Implementation LU-6.A

  The City shall prepare a plan, including land use goals, a business incentive program, and design guidelines to promote high quality private and public development and redevelopment in the downtown. The plan should address design alternatives that would better incorporate the Napa River as a commercial, recreational, <u>**and natural resource and environmental**</u> focus for downtown.

27.19

Responsibility: Redevelopment & Economic Development
Planning Department
Community Resources
City Council
Parks and Recreation

27.19

- Policy LU-9.2
  The City shall continue to apply special development standards to proposed development within **¼ mile of** the following areas:
  a. Riparian corridors and wetlands
  b. Hillsides
  c. Critical wildlife habitat; and
  d. Agriculture land outside the RUL.

27.20

Use of the ¼ mile buffer permits identification and mitigation of the most direct adverse impacts on these resources and makes the policy measurable and more enforceable.

B. TRANSPORTATION

Assumptions are not substantiated.

27.21

The DEIR traffic analysis assumes that a number of road improvements not proposed in the DGP will occur to mitigate for project impacts. No explanation is offered to justify the assumption that these improvements will be in place to further mitigate traffic impacts. The added improvements are neither required nor planned in the DGP.

The standards of significance are insufficient.

Here the significance of impacts is only defined in terms of "level of service" (LOS). The DEIR makes no attempt to quantify impacts in terms of actual traffic volume. The only standard of adverse significant impact considered is the level of service (LOS). The DEIR thereby ignores its obligation to address actual relative change in traffic volumes and the accompanying impacts.

27.22

The DEIR then recognizes the likely deterioration of LOS in several areas of the City, but attempts to explain away the impact by stating that it would simply be too expensive to mitigate. However, no attempt is made to identify mitigations and no analysis of potential costs of them is provided. The City cannot meet CEQA requirements for mitigations by simply lowering standards. This doesn't change the seriousness of impacts.

The impact analysis for transportation related impacts is flawed and incomplete.

Impacts of roadway expansions/extensions are not disclosed. The DGP calls for roadway extensions and widenings over several creeks, identified in table 3-1 of the DGP as Solano Avenue, Soscol Avenue, Gasser Drive, and Terrace Drive. Roadway creek crossings have been found to be significant contributors to flooding in the City of Napa. Nonetheless, an analysis of potential flooding impacts, and potential impacts to bird, fish, and wildlife habitat is not provided. Similarly, impacts of major roadway widenings at Soscol Avenue and realignment of California Boulevard are not discussed.

The DEIR assumes the City can simply build itself out of traffic problems that will be caused by land use policies proposed in the DGP. But the DGP and DEIR are flawed in failing to address the likelihood of funding availability for roadway improvements (deemed mitigations in the DEIR). The DGP proposes a number of assessment districts and prays that other funds will be available through state and federal agencies while providing no indication of whether these funding sources are at all reliable. This is how the City has created its major traffic dilemmas it now faces. 27.23

For years, the City has approved commercial expansions within and nearby the Bel Aire Plaza while assuming that State funds would pay to mitigate for traffic impacts through construction of a Trancas Street overpass. The result is the most dangerous and heavily impacted (SR 29 x Trancas) intersection in the City.

The DGP purports to encourage bicycle use. Unfortunately, there is no implementation program for this mitigation, and no identification of funding responsibility, or potential. At this point we have to expect that the City is not serious about boosting bicycle use. 27.24

The DEIR states that the "transportation system is well developed and is built out to its maximum requirement in most locations." (p. 3.3-1). The DEIR fails to provide data to substantiate this claim, so it would appear to be a subjective observation. Many in the community would disagree with the claim that the City has a well developed transportation system. 27.25

Impacts of mitigation measures themselves are not considered.

The DEIR does not analyze the impacts that road widenings and roadway connectors would have on neighborhood character. This preservation of neighborhood character is held by the DGP as one of the most significant local issues, yet it seems to be passed over as unimportant in the DEIR. Similarly, traffic calming measures in neighborhoods are not defined and no attempt is made to disclose the impacts they may cause. 27.26

In regards to public transportation, policy T-5.2 states that "bus routes should be located within ¼ mile of 85% of city residences" to mitigate for aspects of the project. (p. 3-19). The DEIR states as fact that this goal is currently met by the City's bus system. However the DEIR fails to provide data to support this assertion. For instance, many Browns Valley residents are further than ¼ mile from the nearest bus stop.

27.27 In addition, the DEIR fails to discuss the efficiency of the City's bus system. For example, it can take approximately 1½ hours to travel by bus from Salvador Elementary School to Browns Valley Elementary School. The same trip may take 10 to 15 minutes by private vehicle. It would seem, then, that the public transportation system fails to provide mitigation for the impacts of this plan in at least some instances. The DEIR must provide a more critical analysis of the City's public transportation system, and identify and analyze DGP impacts on the system. An increase in efficiency may encourage more motorists to use public transportation. We would like to see policies aimed at developing a more efficient public transportation system.

27.28 The DGP Policy T-10.1 encourages owners of rail lines to maintain their systems as a mitigation measure to transport goods, and eventually people. The impacts of this policy deserve discussion in the DEIR for its potential to mitigate impacts of this plan including, but not limited to, increased resident and tourist traffic in and out of the Napa Valley.

We request the following New Policies and Policy Changes and Additions.

27.29
- New Policy ___
  The City will require that all public and private projects that may impact river and creek habitat undertake measures to avoid or fully mitigate for potential impacts to river/creek bed and tree/plant canopy.

27.30
- New Policy ____
  The City shall create a model shuttle system designed to transport large numbers of tourists to the downtown or other areas of the city where major overnight and entertainment accommodations are provided. The goal of the system will be to accommodate a large number of tourist visitors into the city without major increases in traffic or needs for roadway improvements.

27.31
- New Implementation ____
  The City shall, in cooperation with the CMA, promote the creation of staging areas on the south edge of the city and provide incentives for tourists to take transit or shuttle buses to their destination hotels in or near downtown Napa. Shuttle services to the up valley areas will also be promoted from overnight facilities within the City.

C. COMMUNITY SERVICES AND UTILITIES

a. Police and Fire

Findings of insignificance are not supported.

The DEIR impact analysis indicates that proposed RUL extensions will not lead to increased response times. However, this assertion is not based on any data provided in the DEIR.

The Stanly Ranch development would require police and fire service for an extensive resort complex and around 550 housing units, representing a large increase in service demand. Yet the DEIR states that demand will not significantly increase since the Stanly Ranch is "within the RUL and existing beat structures." (p. 3.4-5, #1). The assumption, that service to a heavily populated area is the same as to a large undeveloped property, is not supported by any analysis and certainly makes no intuitive sense. 27.32

Analysis is insufficient to support conclusions.

The DEIR also fails to analyze the potential need for police services on Napa State Hospital (NSH) property once it is annexed to the City. It is assumed that NSH police would continue to cover the area themselves, again with no analysis to support the assumption. The City police department will likely become responsible for at least part of the service area of current NSH property. On-going negotiations that would result in the sale of NSH property for development would require city services be established. The impacts on increased fire and police response times to the NSH property must be addressed in this DEIR.

Impacts of increased fire service to the RUL expansion area west of Foster Road are not analyzed in this DEIR. Due to the existing problems with low water pressure, impacts of additional development could further reduce water pressure in the area. This could have significant adverse impacts on fire service. The EIR should address the water pressure limitations in this area and explain how the DGP mitigates for significant adverse impacts on fire service to the RUL expansion and surrounding areas. 27.33

b. Water Supply

Assumptions are not supported.

The current DGP mitigations of adverse impacts on the City's water supply are vague and wholly inadequate. The Environmental Assessment #3 in this section of the DEIR assumes that the DGP "would not result in demand in excess of the City of Napa's water supply system." (p. 3.4-6). However the following discussion admits that this is not the case in times of multi-year droughts. It 27.34

follows by stating that multi-year droughts are not expected to be a significant impact because "water entitlements from the State Water Project (SWP) are growing significantly faster than projected growth in water demand in the City." (p. 3.4-6). Below that we learn that "periodic, unresolved environmental problems in the Sacramento River Delta ... make the reliability of the SWP entitlements unpredictable." (p. 3.4-6). It would appear that the City's water supply is indeed vulnerable. The potential impacts of increased growth with reduced SWP water supplies must be identified, analyzed and mitigated.

Mitigation measures in Goal CS-9 anticipate multi-year droughts, but only implement the Water System Optimization and Master Plan. Implementation programs are not provided for the remaining policies under the goal (p. 4-11,12). The Master Plan is not explained in the DEIR and its funding mechanism is missing. In fact, the City Council eliminated the latest strategy to pay for the Master Plan implementation due to public outcry. Thus, the City is currently left without a plan to mitigate for growth impacts on water supply. The DEIR must provide this information to minimize cross-reference to other documents as required by CEQA, and more importantly, so the entire community may be aware of the City's potential water supply predicament.

27.34

The impacts of providing water service to the RUL expansion area west of Foster Road are not disclosed. The City is aware of the problems of low water pressure in this area. Additional development can be expected to further worsen the water pressure problem. Impacts should include, but not be limited to, requirements for additional water system infrastructure to serve this area.

The DEIR asserts that the policies and implementation programs of the DGP will mitigate impacts of increasing wastewater treatment, storage, and disposal. These impacts will be mitigated primarily through additional facility construction and greater surface applications of partially reclaimed water. However, the DEIR fails to identify and analyze impacts of increased waste water treatment facilitates and surface applications of effluent. Potential impacts such as greater outflow to the Napa River in wet months; higher storm water flows into existing and new facilities, increased pond capacity, lower outflow in the dry months, and expanded surface applications must be addressed. The DEIR makes a cursory review of impacts, stating that impacts "may be significant ... if development occurred in areas outside the planned sewage service boundary." (p. 3.4-4). However, no attempt is made to identify, analyze, nor mitigate the impact.

27.35

c. Trail Development

Without analysis or identification of potential impacts, the DEIR states that construction of the proposed trail system may have impacts on sensitive biological resources. We agree, and add that potential soil erosion, stream bank degradation, fish and wildlife disturbance, downstream sedimentation effects,

27.36

etc., may be significant and adverse. Later in this document we offer stronger mitigation measures to ensure a lower level of impact. 27.36

d. Visual Quality

The presumed effectiveness of mitigations is not supported.

The location of the two southern gateways are arbitrary and inappropriate. Heading north to the Napa Valley, travelers obtain their first perceptions of the City from the "Southern Crossing" State Route (SR) 29 bridge over the Napa River and at SR 221 by Soscol Ridge. It is here that the City and the Valley are revealed. It is here that our community will be best served by maintaining high visual quality standards.

The development proposal of Stanly Ranch has potential significant adverse impacts on the visual quality, scenic corridor, and gateway features of the City, and is in conflict with Policy LU-1.6 that protects SR 21 and SR 29 as scenic corridors. The Ranch is visible from the Southern Crossing and from SR 12-121. The visual impacts of Stanly Ranch development are not identified nor analyzed in the DEIR. We believe that the development proposed for Stanly Ranch is not in keeping with the current visual character and identity of the area. We submit that this proposal would be a significant adverse impact as defined in the DEIR Significance Criteria, in that it "results in a substantial, demonstrable negative aesthetic effect, such as obstruction of a scenic vista or the creation of an aesthetically offensive site open to public view." (p. 3.6-2). 27.37

Additional residential development of the RUL expansion area west of Foster Road would create very visible development on open, steep hills. The visual impact significance of the hillsides is dismissed as insignificant by the DEIR. Surely this is a controversial and subjective decision. Development of nearby hillsides at Westwood Hills Park has been controversial for years, the subject of numerous public reviews, news paper articles, and public letters. Despite this, the DEIR ignores significant adverse impacts of aesthetically offensive housing development on hillsides. Visual impacts that may result from development of lands of the State Hospital must also be considered in the DEIR.

We request the following changes to the visual gateway locations and mitigation measure.

- Figure 1-3: Visual Gateways
  Relocate the SW gateway area south to the junction of 12/121 & 12/29 and extending south past the Stanley Ranch and east to the Southern Crossing.
  Relocate the SE gateway area south to the 12/29 & 221 junction to the southern crossing and extending northward. 27.38

(policy changes and additions are printed in **bold** and underlined)

27.39

- Policy LU-1.5

  The City shall refine the locations and concept of the key gateways to the city identified in Figure 1-3, and shall establish gateway and scenic corridor guidelines for both public and private development to ensure attractive entrances to the City. **The visual gateways shall incorporate green ways, open space, riparian corridors, and wetland areas.**

D. AIR QUALITY

The findings of insignificance are not supported.

The DEIR does not address current air quality conditions and the scientific evidence that air quality standards in locations such as the Bay Area are not protecting public health. New EPA proposals may increase the standards for air quality as soon as June of 1997. The DEIR must disclose the air quality impacts of development as proposed in the DGP.

27.40

The DEIR also relies on policies to mitigate for undefined air quality impacts. But the policies are not definite enough to be reliable. For instance, bicycle lanes are proposed to meet the standard of compliance with the regional air quality plan. But policies of the DGP also allow the requirement for bike lanes to simply be discarded at the discretion (or whim) of the City Council. This cannot be relied on to mitigate for any project impacts, and is not acceptable.

E. BIOLOGICAL RESOURCES

The policies identified as "mitigation measures" to protect sensitive environmental areas are often vague to the point of making them ineffective as mitigations.

27.41

The DEIR acknowledges the sensitive nature of salt marsh species, and without analysis asserts that policy measures in the DGP mitigate any significant impacts. The DEIR simply references policies and implementation programs and assumes that these will mitigate any significant adverse impacts. The DEIR fails to show how adverse impacts of development in these very sensitive areas will be mitigated. Moreover, as mitigation the DEIR refers to policy LU-9.2 that says "The City shall continue to apply special development standards" yet makes no attempt to identify these standards. Undefined development standards cannot be expected to mitigate anything. These proposed mitigations are vague and would circumvent public disclosure of the impacts on salt marshes due to implementation of the DGP. These "special development standards" must be identified in this DEIR.

We agree with the DEIR when it states that "Potential impacts ... can be avoided by not developing any portion of a jurisdictional salt marsh." (p. 3.7-8). This is not secured by designating salt marshes and other sensitive environmental areas as Public Serving (PS). In fact, the PS designation proposed would allow an array of public facilities with a floor-area-ratio (FAR) of 0.40, potentially allowing 40% of these rare and vital areas to be developed. This would indeed be an adverse significant impact.

27.41

Here again, the creation and application of the Resource Areas (RA) land use designation would provide a mechanism for mitigating potential impacts. Incidental improvements such as trails, visitor centers, rest rooms, etc., could still be considered appropriate in these areas. Sensitive environmental areas, including remnants of native vegetation, within the RUL should receive substantial protection offered by this new land use designation.

We request the following New Policies and Policy changes and additions:

- New Policy ___
  The City shall identify and shall seek to reestablish, improve, and restore wildlife corridors reaching into and beyond the urban city zones by creating contiguous wildlife habitats wherever feasible. The corridors will serve as habitat zones for resident species and pathways for migrating species.

27.42

- New Implementation ____.
  The City shall revise its ordinances to, in all circumstances, avoid disturbances by public or private development projects within 100 ft. of river or creek bands. In situations where such disturbances are unavoidable, the City will require that channel disturbances occur during the season of least impact and that measures are taken to fully reestablish tree canopy and other creek bed features as quickly as possible.

27.43

- New Implementation ___.
  The City will develop and implement a new wildlife corridor overlay district and ensure that all development within designated wildlife corridors provides for protection or reintroduction of local species of plants, birds, fish and other animals, and accommodates the migration of birds and other wildlife. Wildlife corridors may be designated on public or private lands along the river, its tributaries, in public parks and spaces, and along bike paths or train tracks wherever feasible. Landscape and mitigation areas within the district shall prioritize the establishment of endemic species of highest habitat value.

27.44

27.45

- New Policy ___
  The City shall protect existing wetland resources and support the re-establishment and/or restoration of wetlands where feasible. The City shall, in all circumstances, seek to prevent the encroachment, degradation, filling or other alteration of jurisdictional wetlands. In situations where adverse impacts are unavoidable, science-based wetland mitigations shall be designed to fully replace wetland value and result in no net loss of acreage.

27.46

- New Policy LU-4.12
  The City shall require new residential development to enhance, restore, and where practical, expand remaining riparian and wetland areas.

27.47

- New Policy LU-4.13
  The City shall require that new development on the City fringe pay the full marginal cost of the development. This will provide economic incentive for new development within the City center, and around the downtown area, and ensure that new development on the fringe bear its true cost.

(policy changes and additions are printed in **bold** and underlined)

18

- Policy LU-6.4
  The City shall promote river front development that reorients downtown to the Napa River and shall encourage creative designs during the development review process **that address the environmentally sensitive, threatened and endangered species, as well as functional floodplain characteristics**.

27.49

- Policy LU-9.3
  The City shall **require** the maintenance of wildlife corridors and **prohibit** the fragmentation of large natural plant communities when environmentally sensitive sites are developed.

27.50

- Policy LU-9.4
  The City shall **discourage development in high priority** environmentally-sensitive areas **by requiring cluster forms of development and requiring amendments to project designs where appropriate**.

27.51

- Policy LU-9.5
  When proposed development within the density ranges prescribed by the underlying land use designation is inconsistent with conservation of critical environmental resources, the City Council **shall** reduce the project size, scale, or density (to less than the minimum density) provided the City Council makes one or more of the following findings: (the remainder of this policy remains unchanged)

We wish to emphasize here that many proposed policies contain good ideas. However, many are not assigned implementation programs. The City must provide language to actually implement these policies if they are to serve as mitigations. 27.52

Additional policy changes include:

- Policy NR-1.3
  The City shall **require** the planting of native plant species in natural habitats 27.53

- Policy NR-1.4
  The City shall review all future waterway improvement projects (e.g. flood control, dredging, private development), as well as all projects that are within **¼ mile (to account for flood dispersal areas and wetlands)** of the waterway, to ensure that they protect and minimize effects on the riparian and aquatic habitats. The City shall also **require** native plantings along the river and creek banks to stabilize the banks, reduce sedimentation, reduce storm water runoff volumes, **increase between-storm stream flows through greater recharge, provide valuable wildlife habitat throughout the year**, and enhance aquatic habitats. 27.54

- Policy NR-1.6
  The City shall require as a condition of approval that development provide protection for significant on-site natural habitat ("whenever possible" stricken). If such habitat cannot be avoided due to **demonstrated economic hardship**, the City would permit equivalent, **science-based,** mitigation off-site. **In the case of residential development, the City shall perform this review during the subdivision process**.. 27.55

- Policy NR-1.7
  During development review, the City shall ("endeavor" stricken) identify and protect significant species and groves or clusters of trees on project sites 27.56

F. GEOLOGY, SOILS, AND SEISMOLOGY

The DEIR ignores its own standards and mitigations to justify findings of insignificance in exposing people and structures to hazards.

The DEIR gives a cursory evaluation of hazards to people and property caused by development in high risk areas. The DGP accommodates a cluster of residential development of around 550 housing units and a resort hotel in the Stanly Ranch, an area vulnerable to "very violent" ground shaking intensity from 27.57

27.57 the West Napa Fault. (Figure 8-1A, p. 8-3). DGP policy HS-1.2 is the mitigation measure. However, the policy is intended to "discourage siting of facilities necessary for emergency services, major utility lines and facilities" and likewise discourages "high occupancy structures." (p. 8-2). These are to be discouraged within areas subject to very strong, violent or very violent ground shaking. The mitigation is invalid since the DGP land use designations provide for those very uses on the Stanly Ranch.

27.58 Several other areas are given land use designations inconsistent with the DGP polices which are supposed to mitigate for impacts. The "Giovannoni peninsula", a small spit of alluvium soil in the Alta Heights Planning Area is designated "MU", allowing from 10-40 units per acre, though this soil type is described as most susceptible to liquefaction. The finding that those risks are mitigated to a level of insignificance has no basis.

27.59 The DEIR also provides no analysis to support its finding that construction of residential homes on slopes of 30%, as would take place within the RUL expansion area west of Foster Road, can be mitigated by the policies offered in the DGP. We request the identification and analysis of impacts.

H. HYDROLOGY AND WATER QUALITY

27.60 The DGP policy HS-3.9 actually enables increased floodplain development if an adequate and affordable flood control project is not agreed upon by the year 2000. It is not in agreement with the expressed natural resource objectives of the DGP. In fact, it is dangerous. Allowing floodplain development exposes additional life and property to flood dangers, and irresponsibly increases flood risk down stream. To meet natural resource and health and safety objectives, development in the floodplain must be avoided and riparian and wetland areas must be protected and restored when possible.

In general, measures to mitigate impacts of the DGP on flooding are inadequate.

We suggest the following changes:

27.61
- Policy HS-3.2
  The City shall continue to apply flood plain management regulations for development in the 100 year flood plain and floodway, **and require that new development show how it will affect downstream flows and flood potential**.

27.62
- Policy HS-3.6
  The City shall support **alternative** programs and methods to reduce the flooding of the Napa River and its tributaries **in a manner that that maintains, to the greatest extent possible, the natural functions of the Napa River using the most cost-effective solutions**.

- New Policy HS-3.10
  The City shall require that flood control channels be kept in functioning condition. Tree cover on channel banks will be used to control in-channel vegetation growth unless physical limitations or constraints require alternate plans.

27.62

We believe it worthwhile to investigate the possibility of combining restoration and flood control efforts. Parks, trail areas, riparian areas, and constructed wetlands could all serve as temporary relief basins or wide outs to slow flood waters and prevent flooding down stream. Golf courses may be used in a similar manner.

27.64

III. CONCLUSION

The Sierra Club Napa County Group finds that the policies and programs listed as mitigations in the DEIR cannot lead to attainment of the environmental and quality of life goals proposed in the DGP. We reach this conclusion by noting that the DEIR:

- does not adequately identify and analyze impacts of the DGP
- mitigation measures are often inadequate and vague, and
- fails to fully disclose potential impacts of RUL expansions and the Stanly Ranch and Foster Road developments.

In essence, mitigation measures in the DGP are so indeterminate and the DEIR so abstract that we cannot agree with the DEIR when it states that there are not significant impacts anticipated from adoption and implementation of the DGP due to the self-mitigation nature of the DGP. (p. S-4).

We urge the City to revise the DGP to avoid heavy mitigation and to develop a true "confined city policy" that also protects and restores wildlife habitat within the city.

GENERAL PLAN COMMUNICATION # 28

NAPA COUNTY

CONSERVATION, DEVELOPMENT and
PLANNING DEPARTMENT

Jeffrey Redding
Director

1195 Third Street, Room 210 • Napa, CA 94559-3092
Telephone 707/253-4416 FAX 707/253-4336

November 21, 1996

John Yost, Planning Director
City of Napa
1600 First Street
Napa, California 94559

Re: City of Napa Draft General Plan and EIR--Addendum #1 and #2/Errata Sheet

Dear John:

This letter is in response to your November 18, 1996 transmittal of Addendum #1 and #2 and, the errata sheet, to the draft General Plan documents that we received today. This letter is intended to supplement the two comment letters that were hand delivered to your office on November 18, 1996, each relating to the draft General Plan and draft EIR.

Addendum #1

The draft policy document should be amended to include policies to ensure that the future project to be constructed on this site will be compatible with the adjacent County zoning designation (i.e. Agricultural Preserve), the designated Silverado Trail scenic corridor and Milliken Creek which forms the eastern boundary of the site. 28.1

The EIR must also be revised to address impacts associated with this project. Traffic is of particular concern and the following intersections must be evaluated as part of the draft EIR: Trancas Street/Silverado Trail intersection, Oak Knoll Avenue/Silverado Trail and. intersections further north. The traffic analysis must take into account regional traffic growth and cumulative impacts, accounting for both city and county projects. We question the conclusion on page 3.3-4, Table 3-3.2 that, with the hotel complex, the LOS at the Trancas Street/Silverado in the year 2020 will remain at LOS C. 28.2

Addendum #2

We want to remind you that certain lands south of the City, east of Highway 221 are designated as 'urban' on the county general plan. This Addendum and Exhibit C should reflect this fact. We would it if you would review the text and Exhibit C to ensure that county urban lands are not included as greenbelt lands. 28.3

Errata #1

28.4 We would like to urge you to consider add programs and implementation within the Housing Element reflecting a commitment by the city to enter into a joint program with the county to share housing credits as envisioned under Valerie Browns Assembly Bill 3456. Our letter of November 18, 1996 includes some additional suggestions for the housing element that we hope you will consider.

Thank you for this opportunity to comment.

Sincerely,

Jeffrey Redding
Director

cc: Board of Supervisors
Jay Hull, County Administrator
Robert Westmeyer, County Counsel (with addenda and errata sheet)

GENERAL PLAN COMMUNICATION # 29

NAPA COUNTY LOCAL AGENCY FORMATION COMMISSION

1195 THIRD STREET, ROOM 310 · NAPA, CALIFORNIA 94559
VOICE 707/253-4805 FAX 707/253-4176

CHARLES WILSON
Executive Officer

November 26, 1996



Deborah Faaborg, General Plan Project Manager
City of Napa Planning Department
P.O. Box 660
Napa, CA 94559

Subject: Comments on the Proposed Addenda to Draft City of Napa General Plan Environmental Impact Report

Dear Ms. Faaborg:

This office acknowledges receipt of Addendum #1 and #2 to the Draft City of Napa General Plan transmitted in your letter dated November 18, 1996. Your transmittal also provided notice of extension of the public comment period for the Draft EIR to Monday, December 2, 1996. Based on review of the two addenda with the Draft EIR, the following additional comments are submitted:

ADDENDUM #1 - RUL ADJUSTMENT:

Addendum #1 would modify the Residential Urban Limit Line (RUL) to include a five acre parcel located on the northeast corner of the Trancas Street and Silverado Trail intersection. The proposed General Plan Land Use Designation is TC - Tourist Commercial.

29.1

The Draft EIR fails to assess adequately the environmental aspects and impacts of the proposed urbanization of this area. The following environmental impacts of Addendum #1 need to be analyzed fully in the Draft and Final EIR:

Growth Induction:

The proposed urbanization of this area, including the extension of urban infrastructure and public services, should be evaluated for its growth inducing impacts to adjacent land in agricultural and open space use.

Cumulative Impacts

The Napa County Local Agency Formation Commission currently has an annexation application on file to annex this parcel to the Napa Sanitation District. The application notes that a development project has been filed with the City of Napa to develop a "Winery/Hotel" on this parcel. The application was deemed "incomplete" pending completion of the required environmental document by the City, lead agency under CEQA for the development project. The General Plan Draft EIR must evaluate the environmental impacts associated with the proposed development project for cumulative impacts. 29.1

Alternatives Section:

The Alternatives Section should evaluate alternative land use designations for the subject territory which would be compatible with the surrounding agricultural or open space land use. A second consideration for analysis is the detachment of this isolated detached area from the City.

ADDENDUM #2 - No comments are being submitted.

Very truly yours,

Charles Wilson

Charles Wilson
Executive Officer

cc: Chairman John Brown and Members of the Commission
Margaret Woodbury, LAFCO Counsel

City of Napa/GPEIR2.doc

December 2, 1996

John Yost, Planning Director
City of Napa, Planning Department
1600 First Street
Napa, Ca 94559-0660

DEC

RE: Comments on City of Napa General Plan Draft EIR

Dear Mr. Yost;

It does not seem that this DEIR for the envision NAPA 2020, City of Napa General Plan is ready to be passed by the City Planning Commission at this time. It is inundated with inadequacies, pertinent information is not readily accessible, or it has not been sufficiently proofread. Many of the comments do not complete a logical thought such as on page 2-10, under Economic Development. The second sentence seems to imply that this "Draft General Plan will attract higher paying technical and professional jobs," ... "such as Auto Row" and then the sentence is left dangling. Can you explain what was meant on this page? And, is it possible to have someone check for other apparently misleading information? 30.1

On page S-1 we are told that the General Plan Update process began in 1991, a period of five years. It is to be implemented for a period of at least twenty years. On page I-2 we are told that we would have 45 days for public review. Though, the Nov. 18th deadline was extended by two weeks, it seems imperative that a document that has taken so much time to prepare and will affect the life of such a vast array of people be open to public scrutiny for a longer period of time; can you explain why this is not possible? 30.2

Page S-5,6 Under the Alternatives To The Project, discussion mentions the City's *Futures Report.*, (January 1990), whereby a number of other alternatives were rejected; where may the general public access these reports? 30.3

Page S-7 Under Reduced Growth Alternative 1: No Growth, fourth paragraph: "a long -term moratorium on growth" or the "No Growth Alternative...would improve the City's job/housing ratio." therefore, "it is rejected as a practical alternative." Wouldn't an improvement in the job/housing ratio be a good thing for the Napa community? A 30.4

30.4 practical alternative would seemingly be a justifiable solution, can you explain why it is not?

30.5 Pages S-7, S-8 Reduced Growth Alternative 2: Decrease Housing City-Wide, though it seems that there would be a moderate reduction in air emissions, noise, and community service demands this would not preserve existing residential character, but in actuality would create "greater impacts in certain areas," ... can you explain how having less homes will increase air emissions, noise, increase community services or decrease the ambiance?

30.6 Page S-8 With Reduced Growth Alternative 3: Selective Decrease in Housing paragraph three, at: "and (3) creates pressures to redevelop older areas with historic buildings." Historic buildings are already in existence. So, with the above quotation, do you mean to imply that with selective decrease in housing our historic buildings would have to be demolished and replaced with new buildings?

Thank You
Susan Rushing Hall

APPENDIX E

Louise Sterrett
4032 Wisteria Way
Napa, CA 94558
December 2, 1996

Mr. John Yost, Planning Director
Planning Department
P.O. Box 660
Napa, CA 94559

GENERAL PLAN COMMUNICATION # 31

Dear Mr. Yost:

I have reviewed the August 16, 1996 draft of the City of Napa General Plan. Listed below are my comments and questions.

1. STATEMENT

Page 5, right hand column, 1st paragraph, line 8: "The City Council adopted a new general plan in 1975, less than two years after the plebiscite. Consistent with the advisory ballot measure, the plan projected a year 2000 population of up to 75,000 "

Comment:

The ballot measure read: "(D) The City of Napa now has a population of 40,000 people. If the City is to grow, what do you think would be a size city you would like Napa to become?" 31.1

Five choices were given. The first one was Santa Rosa (75,000 people). Out of the five choices this one received the most votes. No where on this ballot was the year 2000 mentioned. Therefore, to be historically correct the words "consistent with the advisory ballot measure" need to be eliminated. The sentence should read "The plan projected a year 2000 population of up to 75,000."

2. STATEMENT

Page 14, right hand column, 5th line from bottom: "This General continues . . . "

Comment: 31.2

The word "Plan" needs to be inserted between the words "General and continues".

3. STATEMENT

Page 16, right hand column, 3rd paragraph: "The following definitions describe the nature of the statements of goals, policies, standards, implementation programs, and quantified objectives as they are used in this document:"

Comment:

Definitions are given for the words Goal, Policy, Standard, Implementation Program. There is no definition for the words "Quantified Objectives". It would be very helpful to the lay person reading this document to have this definition. It is a planning concept. Many people do not understand its meaning. 31.3

4. STATEMENT

Page 1-10, LU-1.B: "The City shall revise the Zoning Ordinance to include a Scenic Corridor Overlay Zone . . . Time Frame: FY 02-04"

Page 1-14, LU-4.A: "The City shall revise the zoning Ordinance to conform to the land use intensity and residential pattern . . . Time Frame FY 98-00" 31.4

Comment:

Shouldn't these be done in the same time frame?

5. STATEMENT

Page 1-13, Table 1-3, Line 1: "Type A - characterized by uniformity in platting patterns . . .

31.5

Comment:

Please include the word "platting" in the Appendix A Glossary of General Plan Terms as this word appears many times throughout this General Plan.

6. STATEMENT

Page 1-14, LU-4.2: "The City shall allow . . . single room occupancy units in residentially-designated areas, when they meet the standards for development that protect neighborhood character."

31.6

Comment:

What are the standards for development that protect neighborhood character?

7. STATEMENT

Page 1-16, LU-5.2 "C": To reduce the impacts of existing commercial uses on crucial corridors and other major streets, the City many not allow . . ."

31.7

Comments:

Typographical error - the word "may" needs to be substituted.

8. STATEMENT

Page 1-26, right hand column, 5th paragraph: "This designation provides for detached and attached single family homes, secondary residential units, planned unit and cluster developments, duplexes, triplexes, mobile homes, manufactured housing . . . "

31.8

Comments:

Your definition (Page A-13) of attached single family home mentions as an example a duplex and townhouse. I believe a triplex would be another example. As stated on Page 1-26, what are some other examples of attached single family homes?

9. STATEMENT

Page 2-10, Review and Update of the Housing Element, first paragraph, last line: ". . . next revision due by June 30, 1999."

Policy H-6.2: "As required by State law, the City shall complete a comprehensive review and update of the Housing Element . . . in 1995."

31.9

Comment:

Policy H-6.2 needs to be revised to reflect when the next revision of the Housing Element is due.

10 STATEMENT

Page 5-7, PR-1.4, Line 6: "The service area for community parks is a 1½-2 mile radius catchment"

31.10

Comment:

What is the meaning of the word "catchment"? This same sentence also appears on page F-2, Pr-1.4. Please include this word in Appendix A Glossary of General Plan Terms.

11 STATEMENT

Page 8-1, right hand column, 4th paragraph, Line 9: "The poorly consolidated younger alluvium that occupies areas south of the city and along the Napa River are considered to have high to very high potential for liquefaction."

Comment:

31.11

It would be helpful to developers and people buying homes to have a map showing these areas of high to very high potential of liquefaction, such as shown in Figure 8-1A thru Figure 8-11.

12 STATEMENT

Page 8-13 Conn Creek Dam, Line 4: "The crest height is 125 feet and the reservoir stores 31,000 acre-feet of water. If the Conn Creek Dam were to fail, inundation waters would arrive at the north city limits in 4½ hours with 16-foot maximum water depth at Trancas Street."

Page 8-14 Milliken Reservoir, Line 3: "The crest height is 110 feet and the reservoir stores 2,000 acre-feet of water. If Milliken Reservoir dam were to fail, innundation waters would reach the northeast city limits in one hour with a 16-foot maximum water depth at Trancas Street." 31.12

Comment:

How can the 2 dams produce the same amount of water at Trancas St. when the capacity of each dam is very different? Please verify these figures.

13 STATEMENT

Page 8-21, HS-6.3: "The City shall restrict land uses within Zone D that would create increased hazard risks (e.g., low mobility, highly sensitive to noise) in accordance with the criteria provided in the ALUCP."

31.13

Comment:

Please define and give an example of what is meant by "low mobility" as used in this sentence.

14 STATEMENT

Page 8-27, Table 8-1: "Land Use Compatibility For Community Noise Envoronments"

Comment:

31.14

Typographical error - The correct spelling is environments.

15 STATEMENT

Page C-1 Appendix C, Development Likelihood Factors:"During the residential capacity analysis every parcel in the city's RUL was reviewed for residential potential. The vast majority of the over 20,000 parcels scanned did not meet the minimum criteria for further analysis."

31.15

Comment:

What was the minimum criteria that was used to determine if further analysis was necessary?

16 STATEMENT

Page C-2 Typology Type B - Existing pattern: "Hillside and floodprone tracts are analyzed on a site specific basis. In all other cases, development of estate parcels exceeding the typical median lot size established in the area occurs in conformance with the surrounding net density and type pattern . . ."

.16

Comment:

Please include the word "median" in Appendix A Glossary of General Plan Terms. This calculation was used frequently in the residential capacity for each planning area which appeared in the March 1994 Concept Report.

17 STATEMENT

Page C-5 Appendix C, right hand column, 2nd paragraph: "With the exception of the Linda Vista specific plan area . . . a single capacity scenario was generated for each of the zoning study areas. When a larger study area included "map reference areas" (MRA), it was assumed the zoning pattern of the MRA determined its potential capacity."

.17

Comment:

What is a "map reference area?" Please give an example as it was applied in this sentence.

18 STATEMENT

Page C-6, Appendix C "Areas That Create Their Own Identity", Line 9: "The map at the end of this appendix shows the areas that were analyzed as well as those that weren't."

.18

Comment:

This map was left out, please include it.

19 STATEMENT

Page F-1, Appendix F, LU-9.5 (b): "The site has specific environmental or cultural resources . . . that would be adversely affected by a projected developed at the minimum densities prescribed by the General Plan;"

.19

Comment:

Typographical error - the word "project" needs to be substituted.

20 STATEMENT

Page G-2, Appendix G, Acknowledgements: "Community Resources Department - Heather Standon, Director"

.20

Comment:

Typographical error - Heather's last name is spelled "Stanton".

Yours truly,

Louise Clerici

Louise Clerici

Charles W. Shinnamon, P.E.

GENERAL PLAN COMMUNICATION #32

1541 Third Street
Napa, California 94559

Telephone 707-252-3367
Fax 707-224-3938

December 1, 1996

Ms. Deborah Faaborg
Mr. John Yost
Napa City Planning Department
1600 First Street
Napa, CA 94559

DEC

Re: General Plan EIR

Dear Deborah and John:

The following are comments and questions I would like to submit for the record and to have answered as part of the EIR process:

- Traffic: Given that most of us experience growth through the amount of traffic it may generate, I think that it is vitally important to clearly address how traffic is going to be handled over the next 24 years that are envisioned by the General Plan. I am concerned that the DEIR covers vitally important issues with a minimum of detail or discussion. Some of the mitigation measures and / or assumptions seem unrealistic to me:

    - The stipulation that Soscol from Imola to Lincoln will be widened with <u>six</u> lanes (Pg. 3.3-6) at some future point is hard to fathom. I understand Dowling Associates' need to make assumptions for their modeling in order to present a coherent plan. This one is not acceptable to me as a mitigation measure nor as an assumption for the traffic model; I doubt that the rest of Napa would accept this either. This issue needs to be addressed in more detail, perhaps with a different set of assumptions. 32.1
    - Table 3.3-3. Although they are nice dreams to include in the model, I suggest that the Linda Vista Ave. bridge (#7) and the Solano Ave. bridge (#8) be removed from this list of assumptions for the purpose of creating the model. At least we'll know the impacts of traffic without these improvements being made. They have been in the City's wish list for many years and probably will remain so. Let's make sure the model works without them. 32.2
    - I found the issue of the Congestion Management Plan and its applicability very confusing. I found the letter from the CMA (Appendix C) very difficult to understand and don't understand the discussion of how the General Plan model should or shouldn't fit into the CMP model. I would appreciate clarification. 32.3

- Although part of City-County cooperation is political and is hard to address in an EIR, I think that it is imperative that there be discussion of how the traffic generated from the Airport Area Specific Plan will impact the City. My purpose is not to suggest that the Airport development not happen but rather that there be some thoughtful discussion and mutual planning between the City and County and their consultants. 32.4

- Land Use:

  - I understand from others that the General Plan may overstate the amount of developable land available within the RUL for commercial and industrial development. If this is true, how will the City accomplish its goal of shifting its own jobs/housing balance within the RUL? Are there impacts, then, that have not been addressed? 32.5
  - I realize that the DEIR is not the appropriate place to discuss projections of future residential development quantities but I have a hard time visualizing, as an example, another 1277 homes in the Linda Vista Planning area (Table 2-3). I understand that these projections occured in the early 1990's and that there has been some building that has taken place. Nevertheless, I don't recognize where these homes will be built in the quantities projected. If this is true, what impacts are there, especially related to the jobs/housing balance? 32.6

The General Plan and DEIR are complex documents and will require more review on all of our parts. I regret that I have only had the time to prepare the above comments.

Sincerely yours,



Charles W. Shinnamon, P.E.

Mark D. Brewer
P. O. Box 866
Glen Ellen, CA 95442
707/996-9900

DEC

City of Napa Planning Department
Attn. John Yost
1600 First Street
Napa, CA 94559

Rec'd Fax 12-2-96

Re: Draft E.I.R. comments
General Plan Update

December 2, 1996

Mr. Yost:

I am the principal owner of 7.3 acres of land at 404 Silverado Trail, with additional frontage on Capitola Way. The easterly third of my parcel (APN 46-060-04) is currently zoned for medium density single family housing, with the burden of accommodating a portion of a connector street from Souza Lane to Liberty Way to meet traffic circulation requirements. The rest of our parcel is zoned for higher density multi-family housing.

Please be aware that, in view of staunch opposition on the part of existing homeowners in the area to any east-west traffic connection, we oppose the requirement of a Souza Lane extension (policy #T-1.9b). 33.1

In addition we oppose any down-grading of zoning on our property, particularly in view of the stated goals (H-1 and H-1.3) of maintaining sufficient housing opportunities in Napa. 33.2

Sincerely,

Mark D. Brewer

MDB:mm

Napa, California
December 2, 1996

GENERAL PLAN COMMUNICATION # 34

City of Napa
Planning Department
1600 1st Street



Attention: John Yost

The new proposed General plan for the City of Napa apparently still has no map of the Redevelopment Agency 33 blocks, 324 acre area of Napa downtown; though the agency has an outdated plan the proposed General plan does not address the many changes made to the area in spite of this old plan, nor does it address the future plans and changes that the agency might be contemplating. 34.1

Because of this omission, the environmental effects of the changes cannot be addressed directly.

Doesn't the omission of the impacts of plans and maps make this General plan inadequate?

Sincerely,

M. Fagiani

GENERAL PLAN COMMUNICATION #35

221 Winding Way
Napa, CA 94559
November 29, 1996

DEC

John Yost
City Planning Department
1600 First Street
Napa, CA 94559

Re: Draft General Plan EIR

Dear Mr. Yost:

I have only had a brief amount of time to review the General Plan EIR but would like to make some comments, primarily in relation to the Stanly Ranch. I understand that the Stanly Ranch was designated in the 1982 General Plan as a Study Area and that the owners had to then make their case for development. The Draft General Plan and EIR basically give the owners their development approvals without public debate!! There is mention of tourist commercial uses and possible development of 600 homes! Where are the environmental impacts addressed? What are the impacts of such development on the Highway 29/Sonoma Highway? How about a new signal at Stanly Lane? What are the growth inducing impacts on the areas between Stanly Ranch and the south side of the main part of Napa? None of these issues are addressed in the EIR. 35.1

I understand the City's desire for the development of a new resort such that hotel taxes can be collected. I feel comfortable with a small resort on Stanly Ranch with perhaps 100 to 200 rooms as long as the rest of the property is devoted to agricultural and wine related uses. The net fiscal impact would probably be more beneficial than the potentially huge project. The hotel would have to be well designed to minimize impacts but it's possible to do it without destroying the rest of the site. Skip the 600 homes. They will destroy the property. The EIR does not address the impacts of these homes on this land. Either put the property back into a study area or reduce the potential development potential. Let's preserve a beautiful property as part of the entrance into Napa and the Napa Valley. Don't let it be destroyed, especially without public debate.

Thank you for the opportunity to comment.

Sincerely yours,

Ray Valeri

JUDY IRVIN, A.I.A.

ARCHITECTure
& PLANning

GENERAL PLAN COMMUNICATION # 36

December 2, 1996

John Yost, Director
Planning Department
City of Napa
P.O. Box 660
Napa, CA 94559-0660

DEC

RE: Draft General Plan and EIR

Dear Mr Yost;

I have reviewed both the Draft Policy Document and EIR for the City of Napa General Plan update and I wish to compliment you and your staff for a job well done. The Policy Document is readable, comprehensive and will give our future leaders a defensible framework for future decision making. The policies defined in this document combined with enlightened leadership will allow our community to develop and keep Napa a good place to live.

The following comments relate to both documents and are intended to expand the dialog. I have focused on the Central Planning Unit and related factors; I am sure that other observers will comment on other areas.

Chapter 1: Land Use

The listed development potential for the Central Napa Planning Area does not address the very high number of illegal, substandard and flood prone units in this area. Densities range as high as 300 du's/ acre which is far in excess of the recommended densities with many units in basements within the flood plain. The City has a Non-Conforming Use Ordinance which states that it is the policy of the City to phase out these substandard housing units and to bring densities into conformance with the Zoning Ordinance. No listing of the existing underlying density is included in either document. Nor are policies designed to encourage Transfers of Densities to more

36.1

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JUDY IRVIN, A.I.A.

ARCHITECTure
& PLANning



appropriate receiver sites. If the policies for Planning Unit #8 and the Historic Resources Element are implemented and the existing ordinances enforced, a net reduction in dwelling units should result.

In addition, the Neighborhood Character analysis states that the Historic or Traditional neighborhoods include most of the very low income housing and small rental units. Policies to "retain neighborhood character" are thinly veiled attempts to keep all of the low income housing in the historic neighborhoods and preserve the affluent suburbs from perceived threats to their economic status.

36.2

Recommendations:

36.3

1. Include policies to encourage density transfers.

36.4

2. Include policies to encourage affordable housing dispersal throughout the City and to ensure a preponderance of owner occupied housing in all planning units.

36.5

3. Existing and historic FAR's exceed the limit of 2.00 imposed for the downtown. An increase in the FAR to 3.00 or 3.50 would create massing and urban form similar to the historic urban form and should be encouraged.

Chapter 3: Transportation

36.6

Traffic is probably the most insidious threat to historic resources and neighborhood character. When traffic increases, uses slowly change from owner occupied, single family housing to rentals, then to multifamily and finally to commercial. Offices and businesses, which then increase traffic congestion even more, remove housing from the inventory and remove the life from the street.

Walkability decreases in direct proportion to traffic increases and the quality of life is eroded. The traffic policies do not effectively address nor mitigate the adverse impacts to historic resources. Numerous areas within the

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historic urban core have been adjudged to be eligible for the National Register of Historic Places and a therefore afforded the protection of CEQA. 36.6

Recommendations:

1. Add a category to Table 3-2: Street and Highway Classification System for Historic Roadways. None of the roadways of the historic road grid in Planning Unit #8 meets the design criteria for either Arterials nor Collectors. High traffic volumes combined with the housing densities and the demographics of the area create a severe threat to public safety. 36.7

2. According to the EIR, projected traffic volumes on Coombs will be close to 10,000 vehicles per day, the First and Second Street couple will carry close to 26,000 vehicles per day while Lincoln will carry only 7,500 vehicles. Given that Lincoln meets the design criteria of a four lane arterial capable of carrying significantly higher volumes while the other two roadways are historic residential streets originally designed for horses and buggies, Lincoln Avenue should be designated the gateway to the downtown. Through traffic should be vigorously discouraged within the historic neighborhoods. 36.8

Chapter 5: Parks and Recreation

This element, which was developed in advance of the General Plan, is internally inconsistent. There are no policies to address the significant lack of parks and open spaces available to the very high population in Planning Unit #8. The large open spaces on the periphery of the City are not accessible to low income people who do not have access to automobiles nor to children and the elderly. 36.9

During flood control project meetings, the narrow strip of land along the river has been frequently mentioned as a possible local contribution to the project without identifying alternative possibilities for acquisition. I recognize that few sites within Planning Unit #8 meet the

1130 First Street
Suite 226
Napa, CA 94559
707/224-3228

JUDY IRVIN, A.I.A.

ARCHITECTure
& PLANning



36.9

parkland acquisition requirements. But since this area has the highest densities without any play spaces except the streets and those are increasingly dangerous, this serious deficit should be addressed in the plan.

36.10

This element also does not include modifications in the flood control strategy developed earlier this year. Significant open spaces might evolve from strategies to protect and enhance the flood plain. Or, if the costs of the flood control project are not accepted by the community, alternative strategies such as moving housing away from areas subject to frequent flooding might be required. In either event, significant open spaces in close proximity to the high populations in the Central Planning Unit would be provided and should be addressed.

Chapter 6: Historic Resources

36.11

For the record, the EIR incorrectly equates the Onasatis and the Coast Miwok. The Onasatis are most probably the first people in California. I understand that a 12,000 year old archaeological site in Lake County has been acquired and sites of similar age in the Napa Valley are probable. Kroeber indicates that the city center was most probably occupied by a Coast Miwok group at the time of contact. The east side of the river was occupied by the Patwin and the north side near Las Trancas was Wappo or Onasatis.

Given that this valley is probably the most significant archaeological area in the western region, we need to be particularly vigilant in protecting this resource for the future.

Good luck in sorting all of this out.

Judy Irvin, A.I.A.

1130 First Street
Suite 226
Napa, CA 94559
707/224-3228

GENERAL PLAN COMMUNICATION # 37

December 2, 1996

City of Napa
955 School Street
Napa, Ca 94559

John Yost
Director of Planning

Dear Mr. Yost:

This letter is in answer to the request by the City of Napa for comments on the updated General Plan. Having been a member of the Citizens Advisory Committee (CAC) for the review and updating the City's 1982 and 1986 General plan, it is felt that it is important that all the members of that Committee should supply written comments on the final draft of the document. Therefore, the following comments are meant to express my personal observations and understanding of the intent of the changes recommended by the Committee when it was disbanded. Moreover, several of my comments pertain to the events that have transpired after the CAC ceased to exist. Because of the diversity of experience and background of the members of the Committee, members of CAC need to be interviewed for their comments even though the members do not follow up with written information.

The Consensus developed by the CAC was the defining of Neighborhoods and neighborhood character plus the added constraints of housing types (Typeology) within the defined neighborhoods. This concept was adopted to avoid the constant acrimonious hearing process that usually followed a construction proposal in an "in-fill" area. The CAC wanted to be certain that this concept was followed and could not be changed without full disclosure and notification to the complete neighborhood. This would not only be part of the General Plan but of commensurate City ordinances that bring to bear the "Police" powers of the City.
I believe that the Neighborhood Character and Typeology were meant to be enforced rigorously and the Council and City staff would be constrained in any attempt to abridge that concept without being subject to formal long term hearing process. Further, there should be recognition of the fact that a significant change in one neighborhood would be interpreted as a change in the overall concept. In other words requested changes would be handled as a very serious manner with public participation. Page 17 should be reworded to reflect the serious aspects of making changes to the Neighborhood Character and Typeology concept.

37.1



LAND USE

37.2 A significant land use geographical area that is in need of a SPECIFIC PLAN is the Central Planning Area #8 and Soscol Planning area #9. These areas are dramatically impacted by the Coalitions Living River Flood Plan and the Center for Wine Food and Arts. Furthermore, there are several parcels owned by the City and County. This Specific plan should integrate the Flood Plan, Trails, Center for Wine Food and Arts and the Expo. An alternative would be to designate the Wine Food and Arts Cultural Center as a separate land use. Failure to meet this need will lead to uncertainties by merchants, private enterprise and transportation. When the flood plan is implemented, there will be major ecological, environmental and economic impacts affecting the property owners and City/ County governments. THIS IS NOT A MIXED USE (MU) AREA DESIGNATION. It will need a special Land Use designation.

Central Planning Area #8

37.3 There are 48 Buildings that have been designated Seismically Impaired. For public safety, these buildings need to be upgraded to meet the required building codes. It would be worthwhile to offer the property owners an alternative which would allow rebuilding to allow for residential housing on the 2nd and third floors. The CAC considered allowing apartments and condominiums in the Central Business District. More people living in the downtown area would certainly enhance the area if the housing was designed and constructed to integrate architecturally with the theme of 1880 to 1930. Designate it DCR—Downtown Commercial Residential.

37.4 The Wine Food and Arts Cultural Center should be designated for a separate Land Use and Planning Area Covering the area now considered by the EIR.

37.5 The Flood Way (Flood Evacuation Area) should have a separate planning area that corresponds with the Coalitions Living River Plan. Because this Area would overlap other planning areas, a study should be made to determine a logical boundary for that area. Land use in the evacuation area would be very highly restricted for safety reasons. Furthermore, commercialization in this area would require specific building codes which would be more restrictive than other general land use designations. I don't believe we should use the excuse that we may never have a flood plan as the problem will remain in Napa until flooding problems have been mitigated in some manner.

37.6 Residential "fill-in" should not allow "flag lots" to be developed unless there are absolutely no other alternatives. The Police Department and Fire Department are opposed to these sub-developments.

Resort plans, such as the Stanley Ranch, should require a supply of housing that will meet the needs of permanent employees. Many employees will require low income housing and Napa currently has a shortage. 37.7

All fill-in projects, singularly or multiples, should receive individual public notice to all residents in the designated Neighborhood areas not just those living within a small radius distance of the project. 37.8

TRANSPORTATION

The transportation section should include a plan for future housing development as every new development needs public transportation service. 37.9

Bus transportation should be more fully integrated with the School District bus program. More effort needs to be devoted to making the system more efficient and less dependent of subsidies. Fare box revenues are too low for sustaining the system. 37.10

The Railroad is a major resource and more encouragement should be applied to increasing the use as a major source of transportation between Napa and Vallejo. It is necessary to reduce the traffic load on Highway 29. See page 9 second paragraph right hand column. 37.11

Page 3-7. Soscol Avenue needs realignment in the Central and Soscol planning areas. The flood plan has changed the relationship of Soscol Ave and the River. Furthermore, Highway #121 should be changed to Soscol Ave. and not remain on the Silverado Trail. The highway should go through the central area of Napa. 37.12

ENVIRONMENTAL ISSUES

There should be a separate section that covers all the environmental issues pertaining to the various sections of the General Plan. More specificity would alleviate much of the confusion relating to development planning and encourage more participation in the process. 37.13

The Clean Cities program is an important element in the solution to Air Pollution. Currently the Napa City and County are participating in this important program and it should be included in the General Plan. 37.14

There should be an ECONOMICS SECTION in the General Plan that would establish an ongoing evaluation of each new development and change in the demographics of both the City and County. It is important to anticipate change and the rate of change taking place. 37.15

Detail Comments

31.16

1. Page 14 last paragraph- next to last sentence--this General Plan.

2. Page 1-3--LINDA VISTA PLANNING AREA- The Linda Vista Planning Area is located in the Northwestern quadrant of the City?

It is important that the residents of Napa understand the General Plan and to relate it to their concerns about the future of the City and County. Having been a member of the CAC, it became apparent that it was necessary to prepare a document that could be easily read and used by individuals and groups that wish to participate in the 20 year development of the community.

John Clifton
21 Lemon Court
Napa, CA 94558
252-7069

State of California

GOVERNOR'S OFFICE OF PLANNING AND RESEARCH

1400 TENTH STREET
SACRAMENTO 95814

PETE WILSON
GOVERNOR

LEE GRISSOM
DIRECTOR

GENERAL PLAN COMMUNICATION # 38

November 18, 1996

JOHN YOST
CITY OF NAPA
1600 FIRST STREET
NAPA, CA 94559

Subject: CITY OF NAPA GENERAL PLAN UPDATE SCH #: 95033060

Dear JOHN YOST:

The State Clearinghouse submitted the above named environmental document to selected state agencies for review. The review period is closed and none of the state agencies have comments. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. 38.1

Please call at (916) 445-0613 if you have any questions regarding the environmental review process. When contacting the Clearinghouse in this matter, please use the eight-digit State Clearinghouse number so that we may respond promptly.

Sincerely,

Antero A. Rivasplata

ANTERO A. RIVASPLATA
Chief, State Clearinghouse

Mail to: Office of Planning and Research, 1400 Tenth Street, Room 121, Sacramento, CA 95814 (916) 445-0613

1 96 3 3 0 4 0

Project Title: CITY OF NAPA GENERAL PLAN AND DRAFT EIR **APPENDIX E**
Lead Agency: City of Napa — **Contact Person:** John Yost, Planning Director
Street Address: 1600 First St. — **Phone:** (707) 257-9530
City: Napa **Zip:** 94559 **County:** Napa

Project Location:
County: Napa City/Nearest Community: City of Napa
Cross Streets: Hwys 29, 121, 12, 221 Zip Code: 94558 & 9 Total Acres: 18.2 sq.mi.
Assessor's Parcel No. Napa County Books 1,2,3,4,5,6,7,35,36,38,39,41,42,43,44,45,46,47,49,50,52
Within 2 Miles: State Hwy #: HWY 29,121,12 & 221 Waterways: Napa River
Airports: Napa County Airport Railways: Napa Valley Wine Train Schools: Napa Valley Unified School Dist.

Document Type:
CEQA: ☐ NOP ☐ Supplement/Subsequent ☐ Early Cons ☐ EIR (Prior SCH No.) ☐ Neg Dec ☐ Other ● Draft EIR SCH# 95-03-3060
NEPA: ☐ NOI ☐ EA ☐ Draft EIS ☐ FONSI
Other: ☐ Joint Document ☐ Final Document ☐ Other

Local Action Type:
X General Plan Update ☐ Specific Plan ☐ Rezone ☐ Annexation
☐ General Plan Amendment ☐ Master Plan ☐ Prezone ☐ Redevelopment
☐ General Plan Element ☐ Planned Unit Development ☐ Use Permit ☐ Coastal Permit
☐ Community Plan ☐ Site Plan ☐ Land Division ☐ Other

Development Type:
(Below as disclosed in General Plan) (Below as disclosed in General Plan)
● Residential: Units ____ Acres ____
● Office: Sq.ft. ____ Acres ____ Employees ____
● Commercial: Sq.ft. ____ Acres ____ Employees ____
● Industrial: Sq.ft. ____ Acres ____ Employees ____
● Educational ____
● Recreational ____
● Water Facilities: Type ____ MGD ____
● Transportation: Type ____
● Mining: Mineral ____
● Power: Type ____ Watts ____
● Waste Treatment: Type ____
● Hazardous Waste: Type ____
● Other: Per required content of General Plan

Project Issues Discussed in Document:
● Aesthetic/Visual ● Flood Plain/Flooding ● Schools/Universities ● Water Quality
● Agricultural Land ● Forest Land/Fire Hazard ☐ Septic Systems ● Water Supply/Groundwater
● Air Quality ● Geologic/Seismic ● Sewer Capacity ● Wetland/Riparian
● Archeological/Historical ☐ Minerals ● Soil Erosion/Compaction/Grading ● Wildlife
☐ Coastal Zone ● Noise ● Solid Waste ● Growth Inducing
● Drainage/Absorption ● Population/Housing Balance ● Toxic/Hazardous ● Landuse
● Economic/Jobs ● Public Services/Facilities ● Traffic/Circulation ● Cumulative Effects
☐ Fiscal ● Recreation/Parks ● Vegetation ☐ Other

Present Land Use/Zoning/General Plan Use: Urban Use including Residential, Commercial, Industrial, Recreation, Education, Health Facilities, Government and Administrative, Roads and other infrastructure.

Project Description: A comprehensive update of the City of Napa's 1982 General Plan. The Draft General Plan consists of two documents, the Policy Document and the Background Report. The Background Report provides supporting information on existing conditions for both the Policy Document and the EIR. The Policy Document establishes policies and programs to guide Napa's development through the year 2020 organized into 8 elements: Land Use, Housing, Transportation, Community Services, Parks and Recreation, Historic Preservation, Natural Resources and Health and Safety. The EIR examines the environmental consequences that may occur from development or other activity that could result from the implementation of the General Plan. The Draft EIR has concluded that the Draft General Plan Policies serve as mitigations for all identified impacts.

State Clearinghouse Contact: Ms. Angel Howell (916) 445-0613

State Review Began: 10-3-96
Dept. Review to Agency 11-12
Agency Rev to SCH 11-15
SCH COMPLIANCE 11-18

Please note SCH Number on all Comments
95033060
Please forward late comments directly to the Lead Agency

AQMD/APCD____ (Resources: 10,15)

Project Sent to the following State Agencies

X	Resources		State/Consumer Svcs
	Boating		General Services
	Coastal Comm		Cal/EPA
	Coastal Consv	X	ARB
	Colorado Rvr Bd	X	CA Waste Mgmt Bd
	Conservation		SWRCB: Grants
X	Fish & Game # 3		SWRCB: Delta
	Delta Protection Commission		
	Forestry	X	SWRCB: Wtr Quality
X	Parks & Rec/OHP		SWRCB: Wtr Rights
	Reclamation	X	Reg. WQCB # 2
X	BCDC		DTSC/CTC
X	DWR		
	OES		Yth/Adlt Corrections
	Bus Transp Hous		Corrections
	Aeronautics		Independent Comm
X	CHP		Energy Comm
X	Caltrans # 4	X	NAHC
X	Trans Planning		PUC
X	Housing & Devel		Santa Mn Mtns
	Health & Welfare	X	State Lands Comm
	Dept. of Health		Tahoe Rgl Plan
	Medical Waste		Other:

APPENDIX E

DRAFT GENERAL PLAN COMMENTS RECEIVED AFTER 12/2/96

APPENDIX E

GENERAL PLAN COMMUNICATION #39

NAPA COUNTY LOCAL AGENCY FORMATION COMMISSION

1195 THIRD STREET, ROOM 310 · NAPA, CALIFORNIA 94559
VOICE 707/253-4805 FAX 707/253-4176

CHARLES WILSON
Executive Officer

Rec'd 12/23/96

December 18, 1996

Mr. John Yost, Director
City of Napa Planning Department
P.O. Box 660
Napa, CA 94559

Subject: Commission Review of the Draft City of Napa General Plan

Dear Mr. Yost:

The Napa County Local Agency Formation Commission, at its December 11, 1996 meeting, reviewed the Draft City of Napa General Plan and EIR, and concurred with the Executive Officer's recommendation to postpone further review pending final actions on the draft documents by the City of Napa Planning Commission. Following adoption of the Planning Commission's recommendation to the City Council, the Commission would appreciate your appearance at a future LAFCO meeting to present a brief discussion and overview of the City's General Plan goals and policies as they pertain to the expansion of the Rural Urban Limit line (RUL) as noted in the General Plan and EIR documents. In this regard, I would appreciate receiving copies of the Planning Commission's agendas and staff reports on the draft documents, and a copy of the Planning Commission's recommendation to the City Council. 39.1

Very truly yours,

Charles Wilson

Charles Wilson
Executive Officer

cc: Chairman John Brown and Members of the Commission
Margaret Woodbury, LAFCO Counsel
Deborah Faaborg, General Plan Project Manager

City of Napa#1\jygprev.doc

Vincent DeDomenico
Chairman

JAN 1997

January 6, 1997

GENERAL PLAN COMMUNICATION #40

General Plan Policy Department
City of Napa
955 School Street
Napa, CA 94559

Attention: Mr. John Yost, Director of Planning

Dear John:

I wish to add my comments to others you have received concerning the new General Plan.

We are all concerned with revitalizing our Downtown area. Mayor Solomon and other city leaders visited San Antonio and their Riverwalk for suggestions on how Napa could create a similar National attraction. Proper design of the Flood Control project in the area between the Hatt Building and the First Street bridge would accomplish the first part of a Riverwalk in the center of Napa. A wide plaza on the East side of the Napa River and a smaller plaza on the West side would give us the nucleus of a Riverwalk and allow the floodwaters to go through the center of the City. This area should be zoned Tourist Commercial. The walk would be at the high tide elevation and would flood during a winter storm. Permanent fixtures would not be allowed on the plaza and would have to be removed before flood periods. 40.1

The river area used to have wharves, fishing, commercial shipping and private river activities. We should bring it back by constructing a wharf area as part of the Riverwalk with concrete and steel pilings so the flood waters can go over and under the wharves without impeding the flow. The retaining walls at the East end of the plaza can be aesthetically designed with stone and concrete. Tourist commercial businesses can be established behind this wall.

Veterans Park can be better utilized for public and social events and entertainment. Temporary commercial activities could be permitted on the Riverwalk so it would not be necessary to block Main Street and Third Street.

The Council should reconsider its decision on First Street. First Street should be one way entering Napa, 2nd Street should be one way leaving Napa. Third Street would continue to be 2 way and directional signs would encourage its use to reach Highway 29. 40.2

40.3 | Moving Soscol to McKinstry/Burnell Streets should be considered if Cal Trans will pay for the bridge and Right of Way.

Thank you for the opportunity to express my concerns.

Sincerely,

Vincent DeDomenico

Vincent DeDomenico
President

VD:ma

NAPA COUNTY FARM BUREAU

GENERAL PLAN COMMUNICATION #41

JAN 1997
RECEIVED
City of Napa
Planning

January 16, 1997

The Honorable Brad Wagenknecht, Mayor
Napa City Council
955 School Street
Napa, CA 94559

Dear Mayor Wagenknecht:

On behalf of the Napa County Farm Bureau I would like to register our concern regarding the proposal by the City of Napa to expand its rural urban limit line. The City's draft General Plan indicates that the City is committed to upholding the current RUL and no expansion is planned. However, the draft EIR proposes incorporating an additional 440 acres of land currently located outside of the City's RUL.

41.1

Expansion of the RUL is contrary to the stated objectives of the City's General Plan and slow growth policies. It also fails to reflect the desire of the Napa citizenry for orderly growth (51% of City voters approved Measure A and 63% of City voters approved Measure J, indicating that City and County residents alike favor slow growth and the preservation of agricultural and open space lands). Additionally, obvious plans to annex an agricultural parcel clearly violates both City and County objectives to protect our valuable agricultural and open space lands.

Additionally, we believe the draft EIR is inadequate for the following reasons:

1. The environmental impacts of the proposal to urbanize the Stanly Ranch area (Napa Planning Area # 12) are not adequately analyzed. Urbanization of the area through the development of 600 residential units would mean a loss of agricultural and open space lands. Additionally, the potential for increased traffic as a result of the Stanly Ranch development is not evaluated or mitigated.

41.2

2. The City plans to incorporate into the RUL, a parcel designated "Agricultural Resource" (east of Big Ranch Road). This signals the City's intent to urbanize agricultural land, a dramatic departure from current City policies.

41.3

3. Both development of the Stanly Ranch area, as well as the agricultural area east of Big Ranch Road are growth inducing. There is no analysis of the impact these developments would have on the surrounding environment or the effect upon the policies regarding agriculture and open space outlined in the County General Plan.

41.4

811 Jefferson Street Napa, California 94559 Telephone 707-224-5403 Fax 707-224-7836

41.5 4. Water availability is not sufficiently addressed. The City indicates that adequate water supplies will be in place by the year 2012. How will the city supply needed water to these new areas of development between now and 2012?

41.6 5. In the City's addendum #1, General Plan Draft Policy Document, the City suggests including a five acre parcel in the RUL on the northeast corner of Trancas Street and Silverado Trail. The proposed GP desgination would be TC - Tourist Commercial. The draft EIR does not assess the potential environmental impacts of commercialization of this area (i.e. how the project will affect neighboring agriculture).

I appreciate the opportunity to comment regarding the City's draft EIR and General Plan. I hope you will address our concerns and bring both documents into sync with the City's stated goal to preserve the RUL and maintain a policy of slow and orderly growth.

Sincerely,

Cio Perez

Cio Perez
President

cc: John Yost, Planning Director, City of Napa

4032 Wisteria Way
Napa, CA 94558

FEB

February 6, 1997

GENERAL PLAN COMMUNICATION #42

Dear John,

I would like to thank you and Deborah for the time you spent with me yesterday answering my many questions. You both are always so patient and courteous.

I had one other thought that I want to share with you. You may recall my request to see a subdivision that was built at 9 units per net acre. Would it be possible to list in the new General Plan residential projects and their locations that have been built in Napa at 2, 3, 4, 5, 6, 7, 8, 9, 10, 15, 16, 20, 30, 40 units per NET acre? It would be helpful to have this information listed in Chapter I "Land Use" and to have several examples of each density. These examples would encompass all the residential densities mentioned on pages 1-42 thru 1-45 of the August 16, 1996 Draft Policy Document. 42.1

This would enable the general public, Planning Commissioners and City Councilmembers to better visualize the proposed density of any future residential project and its compatibility to the character and density of the existing neighborhood.

I know it is your desire to make this new General Plan the best that it can be and I thought this suggestion would help to contribute to this goal.

Sincerely,

Louise Clerici

Louise Clerici

APPENDIX E

NAPA CITY PLANNING COMMISSON MEETING
October 17, 1996

Minutes Excerpt

Agenda Item: ***ENVISION NAPA 2020,*** **DRAFT GENERAL PLAN - DEIR Hearing**

DEIR, ***ENVISION NAPA 2020,*** **DRAFT GENERAL PLAN** - Public hearing on the Draft Environmental Impact Report (DEIR) which has been completed for the City of Napa Draft General Plan, *Envision Napa 2020*. The Draft EIR has been prepared to evaluate the potential impacts that could result from implementation of the policies and programs of the Draft General Plan, which is a comprehensive update of the 1982 General Plan that will guide decisions concerning Napa's development to the year 2020. The Draft General Plan policies and programs are organized into nine elements: Land Use, Housing, Transportation, Community Services, Parks and Recreation, Historic Preservation, Natural Resources, Health and Safety and Administration. The EIR provides environmental analysis under the topics of Land Use, Transportation, Community Services and Utilities, Cultural Resources, Visual Resources, Biological Resources, Geology (Soils and Seismicity), Hydrology, Air Quality, Noise, Public Health and Safety. The Draft EIR finds that the Draft General Plan serves as a mitigation program for any potential impacts that may result from development enabled by the General Plan. After completion of the 45 day DEIR public review period, all comments and responses will be incorporated into a Final EIR which will be considered along with the General Plan at future hearings before the Planning Commission and City Council.

Deborah Faaborg, General Plan Project Manager, provided a brief summary of the EIR review process.

Rod Jeung, Project Manager, Ogden Environmental, explained that an Environmental Impact Report (EIR) is usually prepared to disclose the potential significant environmental impacts associated with a particular project. The Altamura Subdivision or Ridgeview Sports Fields and Community Park Development are very specific projects and the impacts that are identified, and the EIR that's prepared, are actually very straight forward and project specific. Commissioners are often asked to review plans with specific development details. The EIR consultant or staff can review specific project features and determine whether the project is compatible with the

surrounding environment. When presented with project specifics of a development plan, one can estimate how many automobile trips are going to enter or leave the site and determine whether that will create an impact for the pedestrians for the traffic intersections nearby. The information that is contained in a project level site plan allows one to estimate how much water or sewage might be generated from that project. The impact of grading, whether there will be any significant geotechnical problems, the type of erosion that may occur and resulting drainage patterns. With a specific project application, the types of impacts can be determined in detail and specific mitigation measures can be developed for that project. As such, EIR's or Negative Declarations on specific project applications can be very detailed because they have more detailed information.

All that information, all those details, all those plans go out the window when you are talking about a General Plan EIR. In contrast to a project specific EIR, a General Plan EIR is different in that it is more general. The General Plan is the "project" for EIR review. It presents broad policies, it talks about areas that are proposed for development, it doesn't mandate anything, or propose the details of construction; it doesn't prescribe a particular size of development or location; it doesn't talk about how many units or types of units or the setback that is appropriate for a residential development that might be occurring in a particular planning area. What it <u>does</u> do is begin to talk very generally about the intensity and location of development. With the General Plan EIR, you aren't really sure when or where the development is

going to occur, precisely and specifically. Your not going to know when it's going to occur because we are dealing with a 25 year time frame and you don't know how intense the development is actually going to be, you just have general guidelines. So given all these questions, how does one go about actually preparing an environmental document that fulfills the CEQA requirements and fully discloses the potential significant impact associated with something as general as the General Plan. There are three things that we have to pay particular attention to.

First, to get an idea where the development is going to occur, you have to take a look at the Rural Urban Limit boundary. That will tell us the physical limits of development within the City of Napa. Within that RUL, you don't know what's going to be developed except to look at what's in the Plan. The General Plan map gives us an idea of the intensity and location of residential, commercial, industrial and other land uses that will be accommodated within the RUL. The Plan describes the categories of land use but it does not specify the type of residential, whether condo or apartment or senior citizen complex; and, it does not tell you whether it's going to be a commercial business that provides services to local or regional patrons or one that will attract more traffic. We have only the information in the General Plan to rely on. We have to rely on the growth projections that are contained in the General Plan document to anticipate the possible quantity, intensity and timing of development. The General Plan currently explains population forecast for the year 2020 of about 81,000. It describes the number of housing units that might be accommodated and the approximate number of jobs that might be anticipated over the course of the next 25 years. In order to do an analysis, we use those particular quantified numbers in order to get an estimate of the range of impacts.

Finally, the Policy Document contains policy statements and implementation programs. Those programs, policies and diagrams can, in and of themselves, have certain environmental impacts associated with them. We take a look at those to see whether they might result in environmental impacts. For example, when the City prepared the Parks and Recreation Element EIR, there were proposals for certain community parks. The consultant took into consideration things associated with community parks, such as ball fields, lighting and high activity. They considered what community parks might be proposed for the city to compare those against maps that have already been delineated to show sensitive resources such as creeks, etc. and to make a general assessment of whether a park for the general area might have the potential to encroach into any habitats. Mitigations or conditions were developed to minimize those adverse effects; however, the mitigations were at a more general level related to facility location rather than specific design.

Normally, one would think with a General Plan that's proposing an extension of urban development and a population that's going from about 65,000 to 80,000 would have a host of different types of environmental impacts.

Additional growth could imply extending the limits of development up to some of the surrounding foothills; perhaps exposing that development to slope failure or wildland fire hazards. Additional growth could mean there's increased traffic on many of the local streets and on some of the major thoroughfairs. The additional growth could also mean there is greater damage that might occur with a flood event on the Napa River. Those are all different types of impacts that one would anticipate when you talk about development and growth over a course of the next 25 years. The single reason that these impacts are not considered significant impacts in the EIR is because the plan, as it was being formulated, recognized these impacts and hazards and proposes policies that act as mitigation measures to avoid or minimize them. Using the example of the potential extension of development into the foothills and the concern of geotechnical hazards, slope failure and wildland fire hazards; there are policies and implementation programs that are now in the draft General Plan, specifically in Chapter 8, Health and Safety, that require adequate fire protection measures, clearing of vegetation, maintenance of access, adherence to specific geological reports. All of those policies and implementation programs function as mitigation measures in the General Plan EIR. If the City General Plan did not contain these policies and programs, they would be required by the EIR in order to minimize the impacts. The same thing goes for traffic. If the City is anticipated to grow from 65,000 to approximately 80,000, traffic is going to increase on all of the major

thoroughfairs. The draft General Plan contains a list of improvement in Chapter 3, Transportation, along with a series of policies that are intended to minimize traffic impacts. These include policies that encourage bicycle, pedestrian and transit use and other modes of travel and ways to minimize safety issues where you have driveways backing up to collectors.

The final example is flood hazards. When you encourage more land development as part of your strategy along the Napa River, there is the potential to increase the flood hazard to those particular residences and businesses. The current Draft General Plan, Health and Safety Element, talks about continued participation in the Federal Flood Insurance Program. It talks about coordination with the U. S. Army Corp in order to come up with an environmentally acceptable and financialy acceptable solution. And it talks about adherence to building standards and requiring construction at elevations above the flood levels. Again, all of these policies and programs that are in the Draft General Plan and serve to mitigate the effects that might otherwise occur.

As a result of this very conscious effort to recognize and mitigate potential effects of the plan, plus the fact that the City already has existing standard mitigation mesures in Policy Resolution No. 27, the EIR concludes that no significant environmental impacts will result from the adoption of the implementation of the General Plan. The Summary Section in the EIR lists 40 potential impacts that could occur as a result of implementing the General Plan and then lists all the policies and implementation programs that serve to mitigate the effects. This concludes his remarks.

Chair Mulford opened the public hearing.

Harold Kelly, 3450 Meadowbrook Drive, noted the late hour and the few number of people in the audience for a review of a most important document and urged the Commission to take preliminary comments tonight and continue the public comment period to a future meeting at an early hour. He suggested the public hearing on the DEIR be scheduled near the end of the 45 day public review period.

Muriel Fagiani, 905 Caymus Street, presented documents for the public record which were left behind by people who were prepared to speak tonight. She noted the late hour and suggested the public hearing be continued. She believes that the way the EIR has been developed, with separately bound documents, is a mistake. The document does not contain a map of the 1940 or 1986 flood to show the extent of flooding; that is a mistake. The earthquake map shows the area proposed for the American Center for Wine Food and the Arts, the Oxbow; is subject to strong ground movement. She believes that liberally included in the documents are little gems which will someday be drawn out to point up the fact that something can be approved because it was addressed in the EIR. Policy Resolution 27 has Special Conditions of Approval required of developers; however, it is a resolution which can be changed without public hearings. It can be changed by the City Council at its pleasure. There is a suggestion that the Commission has ordinances and regulations that might have to be changed and will be adjusted to this General Plan. She noted that a number of things have to be addressed and the late hour is not the time to do it. She again urged the Commission to continue the public hearing.

A.1

A.2

Louise Clerici, 4032 Wisteria Way, supported the request for a continuance to an earlier hour.

FOLLOWING BRIEF DISCUSSION, **COMMISSIONER HOVER** MOVED, SECONDED BY **COMMISSIONER CUNEY**, TO CONTINUE THE PUBLIC HEARING TO OCTOBER 24, 1996 AT 7:00 P.M.

Motion carried, 5 ayes.

APPENDIX E

APPENDIX E

PLANNING COMMISSION
REGULAR MEETING MINUTES

City Council Chambers
City Hall
955 School Street, Napa, California

October 24, 1996

COMMISSIONERS PRESENT:	Cuney, Kampton, Mulford, Hover and Krider
ABSENT:	None
STAFF:	Planning Department: John Yost, Deborah Faaborg, Virginia Tygart Public Works Department: John Draper
MEETING TO ORDER:	7:00 p.m. by Chair Mulford. Mr. Mulford explained that he was recovering from a problem with his voice and turned the meeting over to Vice-Chair Krider.

CITIZEN COMMENTS

Muriel Fagiani, 905 Caymus Street, expressed concern about the lack of citizen participation at this evening's public hearing on the Draft Environmental Impact Report (DEIR) for the City of Napa Draft General Plan, *Envision Napa 2020.* She suggested that a legal notice in the classified section did not attract attention and encouraged the Commission to contact the Napa Valley Register Editor with a request that the newspaper publish General Plan articles that will provide information to the public and encourage citizen participation.

COMMUNICATIONS & PETITIONS

Associate Planner Deborah Faaborg noted receipt of the following:

A: October 15, 1996 letter from **Charles Bogue, President, Napa Chamber of Commerce**, expressing support for the Draft General Plan and also requesting that the City commit resources to the preparation and eventual inclusion of an Economic Element when considering approval of the General Plan.

B: October 17, 1996 letter (presented at the October 17, 1996 meeting) from **Judith Sears, Friends of the Napa River**. The letter suggests that the details of the Napa Urban Waterfront Restoration Plan be incorporated into the General Plan and that an appendix be added to the General Plan that consolidates all of the policies related to the Napa River Watershed. It also expresses concern that there isn't sufficient detail in the Plan related to stormwater management and suggests that future development contain runoff to predevelopment rates. They request that riparian enhancement be addressed in the Conservation Element. **Ms. Faaborg** described the attachments to this Communication.

C: October 15, 1996 letter from **Charles Bogue, President, Napa Chamber of Commerce**, to the Mayor and City Council transmitting Communication A to the City Council and reiterating the request that an Economic Element be considered.

CONTINUED ITEMS

DEIR, *ENVISION NAPA 2020*, DRAFT GENERAL PLAN - Public hearing, continued from October 17, 1996, on the Draft Environmental Impact Report (DEIR) which has been completed for the City of Napa Draft General Plan, *Envision Napa 2020*. The Draft EIR has been prepared to evaluate the potential impacts that could result from implementation of the policies and programs of the Draft General Plan (a comprehensive update of the 1982 General Plan) that will guide decisions concerning Napa's development to the year 2020. The Draft General Plan policies and programs are organized into nine elements: Land use, Housing, Transportation, Community Services, Parks and Recreation, Historic Preservation, Natural Resources, Health and Safety and Administration. The DEIR provides environmental analysis under the topics of Land Use, Transportation, Community Services and Utilities, Cultural resources, Visual resources, Biological Resources, Geology (Soils and Seismicity), Hydrology, Air Quality, Noise, Public Health and Safety. The Draft EIR finds that the Draft General Plan serves as a mitigation program for any potential impacts that may result from development enabled by the General Plan. After completion of the 45 day DEIR public review period (October 4 - November 18, 1996), all comments and responses will be incorporated into a Final EIR which will be considered along with the General Plan at future hearings before the Planning Commission and City Council.

Associate Planner Deborah Faaborg noted that this item was continued from October 17, 1996 due to the late hour. She reviewed the General Plan and DEIR process and described the purpose of tonight's public hearing.

Vice Chair Krider reopened the public hearing for the Draft EIR.

Chris Malan, 2945 Atlas Peak Road, stated that the Draft EIR claims that the Draft Policy Document is a self mitigating document and that the Draft Policy Document must be comprehensive in planning for all territories. With that in mind, she offered her concerns.

As a matter of process, it is awkward to comment on the DEIR before commenting on the Draft Policy Document. The Draft Policy Document is lacking in content.

B1 The DEIR, Pg. S-10, No. 4, Land Use, "Development associated with the Draft General Plan would result in the conversion of existing agricultural uses and prime soils within the City's RUL to urban uses," states "insignificant". When applied to the Stanly Ranch, she believed this would be a significant impact. The impact of development of significant agricultural land would be "significant", not "insignificant". Also regarding the Stanly Ranch, the DEIR makes little to no comment regarding the environmental impact of the 600 residential homes and 109,314 square feet of commercial or industrial use shown on Table 1-2 of the Policy Document. The DEIR made little comment that the Draft Policy Document gives language regarding the Specific Plan for Stanly Ranch on Page 1-7 of the Draft Policy Document, yet there is no mention of a specific plan under Land Use Designations on Pg. 1-28. In looking through the DEIR, she found little to no comment on the Stanly Ranch. Her understanding is that Stanly Ranch is currently a study area and there is concern that the Draft Policy Document has provided land use designations for the Stanly Ranch. The DEIR is dramatically lacking in its review of the Stanly Ranch and there needs to be a full public review and hearing as to the fate of the Stanly Ranch. The Draft Policy Document should not be assuming that a Specific Plan will meet certain, predetermined criteria. The Stanly Ranch is currently designated a study area and the Draft Policy Document has predetermined a Specific Plan with 600 homes. This is a huge environmental impact and the DEIR does not address this.

B2 Referring to the DEIR, Pg. S-11, Transportation, Ms. Malan stated that because the Draft Policy Document does not adequately implement mass transit, there are no mitigations. Referring to the Draft Policy Document, Pg. 3-28, Transportation Policy T-10.4, she noted that the DEIR is supposed to take us into the 21st century and we should be developing a mass transit system that alleviates pressure to build roads, create more cement and use up

land. She noted that there is no mitigation measure for the replacement of the Imola Bridge for future roadway improvement No. 17 on Pg. 3.3-7 in the DEIR. B3

Referring to Pg. 3.7-7 of the DEIR, she stated that there is no mention of endangered species such as the hardhead minnow, the stickleback and the bluegill that inhabit the Napa River. The Draft Policy Document is lacking in its implementation of wildlife corridors and riparian corridors along the Napa River. Therefore, there are no mitigation measures in the DEIR to preserve what areas remain. There should be clear maps in the Draft Policy Document that show riparian corridors with setbacks. B4 B5

If the Draft Policy Document is to take us into the 21st century with progressive and innovative ideas, she believes that these points should be considered.

Richard Nieman, 3180 Mt. Veeder Road, spoke of concerns regarding how the 900 acre Stanly Ranch has been presented in the Draft General Plan. It appears that no comprehensive environmental review, such as the one required for the Big Ranch Road Specific Plan, is called for. He referred to the description of the development concept for the Stanly Ranch included in the Policy Document. He stated that the Stanly Ranch is designated agricultural land in the center of very sensitive wetlands and has extensive river frontage and that runoff and flooding issues alone should require a comprehensive EIR not to mention the impact of the fertilizers and pesticides from the golf course on the marsh and river systems. Add traffic, habitat issues and water table issues and he believes it is necessary to require a comprehensive EIR before the next step happens. He believes the General Plan should include an agricultural zone and an open space zone and should require the Stanly Ranch to go through a specific plan approval process with a comprehensive environmental review. C1

Muriel Fagiani, 905 Caymus Street, took issue with the way that the General Plan has been organized. She stated that a General Plan is usually one document and asked why the City of Napa Draft General Plan has three separate volumes which have to be integrated by the public. She argued that the Commission should not be taking comments on the DEIR while the Commission is in the process of holding study sessions on the General Plan. She asked the location of the Redevelopment Agency section in the document. She argued that redevelopment has physical and land use implications that are not addressed in the DEIR. She asked for a response to why the General Plan is presented in three volumes, why a Redevelopment Agency section was omitted and why public hearings on the DEIR are being held while the Planning Commission is in the process of holding study sessions. D1 D2

Dorothy Glaros, 1157 Austin Way, Napa, CA 94558, stated for the record that she was a member of the General Plan Citizens Advisory Committee (CAC). She noted that the Errata #1 added specific numbers for rental units, low income families and home ownership to the General Plan; one section specifically states numbers of affordable housing units that the City of Napa will provide. She explained that the CAC was unable to make a determination regarding the specific number of units and is concerned that if a specific number of units is included in the General Plan, it may push a property to high density units when the property is not appropriate for high density. She emphasized the need to look at those specific numbers and also at the land remaining in the City of Napa for high density units. E1

Commissioner Hover expressed a concern that so few citizens attended the DEIR hearings. A lengthy discussion ensued regarding community outreach to encourage more citizen participation. Suggestions were offered and discussed.

Chair Mulford offered the following comments on the DEIR:

He found it confusing for the City to be described in square miles, acres, present and projected population and was also described in terms of housing units, present and projected housing units and present and projected commercial and industrial. F1

F2 The DEIR sets good standards for new development as far as maintaining visual quality, historic districts, neighborhood compatibility, etc., but there are numerous areas where the DEIR should be addressing how we deal with existing development. He believes that if the DEIR is going to address environmental issues of new development, the continued existence of some types of either residential, commercial or industrial that are incompatible with neighborhoods should also be covered. He sees a number of areas in dealing with neighborhoods and neighborhood compatibility with commercial and residential where existing does not get addressed. He believes that in most areas where it talks about new development, existing can also be addressed.

F3 Regarding Reduced Growth Alternative 2 in the DEIR, he understands there are a lot of reasons why the proposed project is a preferred project. Referring to Pg. 5-11 and 5-12, he believes that the arguments made for why preferred Alternative 2 is not a viable alternative are weak. He believes that the arguments related to neighborhoods and the issues of the growth would have to be dealt with in the proposed project would not have to be dealt with with preferred Alternative 2. The reduced traffic noise, air pollution and neighborhood protection could also be used to support Alternative 2. Regarding the comment in the summary of Pg. 5-12 of the DEIR, "...it does not provide any compelling benefits", he can see the compelling benefits for Alternative 2 would be the reduced traffic, noise and air pollution because it is not projecting as large of a growth. Regarding the comment, "...would be less successful in protecting the neighborhood character", he would include the neighborhood topology and proposed policies in the Plan in order to provide this benefit with Alternative 2.

G1 **Commissioner Hover** would like the DEIR to name the exact species that live on all sites within the City as opposed to a more general reference. If we are going to protect habitats and species, we need to know exactly what species we are trying to protect and exactly what property they live on.

Noting that the Commission has expressed a desire for additional community outreach, **Commissioner Cuney** moved, seconded by **Commissioner Hover**, to continue the public hearing on the DEIR to November 7, 1996. Following discussion, the motion and second to continue the public hearing to November 7, 1996 were withdrawn and the Commission requested staff include a paragraph at the beginning of each Planning Commission agenda as a reminder to the citizens of Napa written comments on the DEIR could be submitted until November 18, 1996. The public hearing on the DEIR was closed. Following additional discussion, **Commissioner Cuney** moved, seconded by **Commissioner Mulford**, that during the adjourned study session, the Commission discuss strategies on community outreach with a goal to enhance community participation. Motion carried, 5 ayes.

ADJOURNMENT

The Commission adjourned at 9:00 p.m. to the Committee Room for a Study Session on the Draft General Plan "Envision Napa 2020". Staff discussion focused on the Transportation and Community Services components of the plan and was followed by a general discussion between staff and Commissioners regarding organization and content of the General Plan documents.

The next regularly scheduled meeting is November 7, 1996.

James Mulford, Chair
NAPA CITY PLANNING COMMISSION

John R. Yost, Secretary
NAPA CITY PLANNING COMMISSION



CITY OF NAPA GENERAL PLAN

APRIL 24, 1998

RDEIR
RESPONSE TO COMMENTS

RESPONSE TO COMMENTS ON 12/8/97 *REVISED* DRAFT ENVIRONMENTAL IMPACT REPORT

State Clearinghouse #95-03-3060

APPENDIX E

CITY OF NAPA GENERAL PLAN

ENVISION NAPA 2020

DRAFT GENERAL PLAN
REVISED DRAFT EIR COMMENTS
AND
RESPONSES TO COMMENTS

Prepared by:

City of Napa Planning Department
and
Mintier Associates

April 24, 1998

APPENDIX E

RDEIR Response to Comments
Table of Contents

Introduction 1

Responses to Individual Comments 2

Note: Numerical assignment to communications is continued from 12/8/97 Response to Comments

Written Comments Received by January 21, 1998

43. Joseph Peatman, Dickenson Peatman & Fogarty - *1 comment* 2
44. Judy Irvin - *5 comments* 2
45. Carl Kangas – *1 comment* 6
46. Tom Kambe, Stanly Ranch - *3 comments* 8
47. James O'Loughlin - *2 comments* 8
48. Sierra Club, Napa Coutny Group - *5 comments* 10
49. San Francisco Bay Regional Water Quality Control Board - *7 comments* 12
50. Susan Rushing-Hart – *9 comments* 16
51. Kelly and Chester Gin, et al - *1 comment* 19
52. The California Native Plant Society - *4 comments* 20
53. Louise Clerici - *5 comments* 21
54. County of Napa County Counsel - *20 comments* 22
55. County of Napa Conservation, Development & Planning Department - *6 comments* 33

Written Comments Received After January 21, 1998 and prior to notification from OPR

56. Michael Fennel for Duden Family Trust - *1 comment* 35
57. Robert M. Rugg - *1 comment* 35
58. Governor's Office of Planning and Research - *1 comment* 35

Appendices

A. Comment Letters 43 through 58 36
B. January 1998 Aviation Compatibility Analysis by Shutt Moen Associates 76
C. April 15, 1998 Letter from Regional Water Quality Control Board 90

APPENDIX E

INTRODUCTION

On December 8, 1997, the City released the Response to Comments on the 1996 Draft General Plan EIR, a Revised Draft Environmental Impact Report (RDEIR) and an Addenda/Errata Document. The decision to prepare a Revised Draft EIR was a direct result of the comment and response process and required that the City conduct another CEQA review process. The Revised Draft EIR along with the Response to Comments and the Addenda were subject to a 45 day noticed comment period from 12/8/97 through 1/21/98. Document sets were sent to public agencies both directly and through the Governor's Office of Planning and Research (OPR). Comments received as a result of this noticed review period have been included in this second response document (Appendix A). The numerical assignments for each letter has been continued from 12/8/97 Response to Comments Document. The separate comments from each letter have been numbered and summarized. The responses to each comment may consist of discussion, references to previous responses in the 12/8/97 Response to Comment and references to relevant text in the Revised Draft EIR, the Addenda, and to the Draft General Plan Documents.

This second, RDEIR Response to Comments is considered part of the CEQA documentation for the Draft General Plan and will be included in the administrative record for consideration by the Planning Commission and City Council during hearings on the Plan.

Citizen's should note that the 45 day period for submittal of written comments on the RDEIR allowed the City to prepare this formal "Response to Comments" package as required by CEQA. This does not preclude citizens from submitting written and oral comments throughout the public hearing process on the General Plan and RDEIR and comments may be made up until adoption of the General Plan. Future communications will be included in the administrative record of the hearing process, but, as a practical matter, cannot be included in this formal Response to Comments document.

APPENDIX E

City of Napa Draft General Plan
Envision Napa 2020

Revised Draft Environmental Impact Report
Responses to Individual Comments
Received by January 21, 1998

Numerical assignment to communications is continued from 12/8/97 Response to Comments Document
(Required 45 day Circulation Period: 12/8/97 - 1/21/98)

Full text of comment letters can be found in Appendix A

43. Joseph Peatman, Dickenson Peatman & Fogarty
January 20, 1998

43.1G Commentator describes Pod SFR-123 (Napa Oaks, APNs 43-040-08, 10, 13 and 25) in the Draft General Plan as visually prominent and requests the assigned density be reduced to no more than one unit per 20 acres.

Response: An alternative residential density for a specific pod is a policy consideration that can be presented to the City Council during hearings on the Draft General Plan.

44. Judy Irvin
January 21, 1998

44.1G Commentator expresses concern that the number of documents associated with the Draft General Plan public review process is not consistent with the legal purpose of the Plan and may cause confusion for private citizens.

Response: The Draft Plan and CEQA documents consist of a number of separately bound components, each clearly identified by name and publication date. Every effort has been made to clarify the purpose of each component through prefaces and introductions in each document and in the public notice of availability. The Revised DEIR was prepared using strike-out and underline text to make clear the changes to the DEIR while still containing the original text of the DEIR for comparison purposes.

Envision Napa 2020 is a comprehensive update of the 1982 Napa General Plan and each of the documentation components is designed to meet State general plan and/or CEQA requirements. Government Code Sections 65300.7 & 65301 allow cities flexibility in determining the structure of their general plan documentation as long as they satisfy the minimum content and format requirements. Below

APPENDIX E

is a brief description of the purpose and relationship of the components of the administrative record for *Envision Napa 2020.*

General Plan Documents

1996 Draft Policy Document	Establishes the City's vision for the next 20 years in the form of goals, policies, standards and implementation programs.
1996 The Background Report	Provides a detailed description of the existing physical and regulatory environment within which the new plan is prepared.
Ongoing Addenda and Errata	The Addenda report presents recommended revisions to the policies or programs of Draft General Plan Documents that have resulted from the environmental and public review process. The Errata provide corrections and edits for clarity and accuracy but do not change the substance of any policy. The Addenda / Errata method of presenting revisions avoids the added expense involved in reprinting entire large bound volumes of the Policy Document and Background Report.

NOTE: The adopted General Plan is intended to be a two volume document which will be very use friendly: the Policy Document will have all of the binding policies, and the Background Report will include pertinent supporting information. Both will incorporate the changes adopted by the City Council in the Addenda, Errata, and as determined during the hearings.

CEQA Documents

1996 Draft EIR	Analyzes the potential environmental impacts that could result from development allowed by the Draft General Plan.
1997 Response to Comments on the Draft EIR	Provides a record of comments made on the 1996 Draft EIR (including any General Plan comments that were submitted during the review period) as well as responses to each comment. Includes a comprehensive discussion of the primary issues that surfaced during the comment period. The response process resulted in decisions to prepare a revised DEIR and to recommend certain changes to the Policy Document in the form of Addenda.
1997 Revised Draft EIR	Revises and extends the analysis of the potential impacts under certain topics based on comments received during the public review process for the 1996 DEIR. Provides clarification of environmental analysis, conclusions and recommends additional mitigating policies. Demonstrates revisions to the 1996 Draft EIR by strike-through and underlined text.
Response to Comments on the Revised DEIR	Provides a record of the comments made on the 1997 Revised Draft EIR (including any General Plan comments) as well as responses to each comment. Responses to previously addressed issues consist of a reference to the comment and response in the 1997 Response document.

Support Information

1996 Fiscal Analysis	Evaluates the fiscal feasibility of the general plan concept, prepared to assist decision makers in their review and consideration of the General Plan.

Staff Reports	Summarize the process, legal framework, status of issues and recommendations throughout the review process
Public and Agency made Communications	Communications received after the close of the RDEIR review period will be a part of the ongoing record throughout the Plan review and hearing process.
Hearing Record	Tapes, minutes and exhibits from the hearings are part of the record of information to be considered during review of the Plan.

44.2E Commentator notes the recent formation of the Napa Abajo-Fuller Park National Register District (since the release of the Draft General Plan documents) and expresses concern that traffic projected for Coombs Street will affect the historic resources in the district.

Response: An additional addendum to the General Plan documents is under preparation that includes the necessary revisions to reflect the adoption of the National Register District.

The City's traffic consultant for the General Plan has reviewed the traffic forecasting data for Coombs Street in the vicinity referred to by the commentator. It should be noted that Coombs Street is currently designated a Collector Street and that the Draft Plan continues that assignment. The physical configuration and historic use of Coombs Street fits within the criteria for a Collector Street as indicated in Table 3-3 of the Draft Policy Document which indicates that Collectors can be expected to serve up to 12,000 vehicles per day.

The model indicates that, based on the theoretical 2020 development capacity (all developable vacant land within the city is built on), traffic on Coombs Street is projected to increase by less than 10% above 1992 levels, or less than 1,000 vehicles per day. This is a relatively minor increase in traffic volume over a 20 year period, and the consultant states that the impacts would, for the most part, not be observable by most residents and visitors to the area. This minimal increase in traffic would not alter the District in a way that significantly impairs its historical character. The Draft General Plan policies that support historic preservation (as mentioned below), combined with the overall reduction in densities in the old town neighborhoods (by up to 5 units per acre), will have the practical effect of preserving the special character of the Napa Abajo National Register District. It should be noted that, with the Draft Plan, these neighborhoods will contribute less trips to Coombs Street than would potentially be possible with the current General plan.

The potential adverse impacts due to accidents or congestion referred to in the comment are normal occurrences within any transportation network and are not unique to the this area. It would appear that the concerns framed in this comment are not unusual in any way compared to other areas of the City of Napa.

Many of the Draft General Plan elements contain policies which will support the preservation and re-vitalization of older downtown neighborhoods through reduction in residential densities, traffic calming measures on local residential streets, strengthened ties between the downtown commercial and residential neighborhoods, provisions for design guideline development, and an extensive list of policies and implementation programs in the historic preservation element. These policies are considered beneficial to historic properties. The current General Plan does not apply this level of protection for historic neighborhoods.

44.3G Commentator clarifies the suggestion included in prior Comment 36.3 that the Draft General Plan include a program for the transfer of development rights (TDRs) as a tool to support restoration of historic properties.

Response: As stated in Response to Comment 36.3, the Draft General Plan reduces densities in historic neighborhoods in keeping with the pattern of land use that exists and, in effect, transfers those densities to other locations throughout the RUL. A certain number of pre-existing higher density projects (many of which provide lower income units) will remain in the downtown neighborhoods and become non-conforming. The current Housing Element, which is carried forward in the Draft General Plan, allows for density bonuses for new projects that provide affordable units. In today's housing market, the typical developer is not seeking a higher density project for lower income families unless there are subsidies or other incentives available. It is unlikely, therefore, that a developer would seek to buy additional density from another project in a market where the additional density is already available, but under developed. The Draft General Plan seeks to conserve and improve the character of all neighborhoods in the City and carefully assigns densities accordingly. The commentator does not address the impact that these transferred densities would have on other neighborhoods, particularly those pods that are assigned an already higher density range.

The commentator's proposal is a policy decision subject to review and consideration by the City Council during the General Plan hearings.

44.4G Commentator refers to the Fiscal Analysis and suggests that the "Moving up Market" discussion supports the revitalization of the historic downtown neighborhoods as a place for upscale professionals with diversity of age, income and culture.

Response: Comment noted. The Fiscal Analysis recognizes that an increased emphasis on "quality" is important in all land use categories in order to allow the City to move towards a more balanced community. The Draft General Plan supports this concept with neighborhood conservation and historic preservation policies, and policies for improved commercial and industrial project design.

44.5G Commentator expresses concern that the Draft General Plan reflects conflicting values and lacks "vision".

Response: The Commentator is stating an opinion, but has provided an interesting characterization of the typical conflicts of vision within a community. A General Plan is a community's reconciled vision of the frequently competing goals of its citizens. Readers may come away with different opinions on whether the vision is correct, based upon their own perceptions. Two visions resulted from the Citizen's Advisory Committee and were presented to the City Council in 1993 as two alternatives. After a series of community meetings, the City Council provided its own vision for the General Plan in the March 1994 Concept Report *(available for review at the Planning Department)*. During the public hearing process on the Draft General Plan, the public has an opportunity to tell the Planning Commission and City Council whether the policies and programs of Draft Plan enable the community to achieve the goals established by the Concept Report.

The Draft General Plan does reconcile competing visions and is internally consistent as required by State Law.

45. Carl Kangas
January 20, 1998

45.1E Commentator expresses concern that the Revised DEIR for the Draft General Plan does not address recent questions he has raised regarding the accuracy of the current, adopted Airport Land Use Compatibility Plan (ALUCP) and submits his August 12, 1997 letter to the Napa County Airport Land Use Commission which outlines his recommended changes to the ALUCP.

Response: It should be noted that, although the commentator has signed the communication as a Commissioner of the Napa County Airport Land Use Commission (ALUC), the County staff liaison to the Commission, Deputy County Planning Director Mike Miller, has indicated that Mr. Kangas is not representing the Commission but is expressing his own views as a private citizen. Mr. Miller also informed the City that the ALUC received the information included with Mr. Kangas' letter and referred the information to the Board of Supervisors with a request that a consultant be hired to review the material and make recommendations. On January 27, 1998, the Board considered the request and took no action, deciding to postpone the matter until it could be coordinated with an Airport Master Plan Update. In their report to the Board, the County staff noted that, as part of the Stanly Ranch EIR, the City has hired an airport consultant to review the information submitted by Mr. Kangas; that the consultant concluded that the materials did not present new issues that would necessitate an amendment to the ALUCP as adopted; and that the ALUCP remains technically correct (See Appendix B).

Mr. Kangas raises concerns regarding the adequacy of the current Airport Land Use Compatibility Plan (ALUCP) with regard to noise level contours, safety and open space designations in the ALUCP, particularly related to the Stanly Ranch. The ALUC is charged with the responsibility to evaluate the operation of the airport and to adopt an Airport Land Use Compatibility Plan with land use measures that address public health, safety, and welfare and establish land use compatibility policies and guidelines for local jurisdictions affected by airport activities. According to the processes established by state law, if the ALUC should choose to adopt a modification to the ALUCP that affects land use in the City, the City must either amend its General Plan or take specific steps to override the ALUC (see Draft Policy Document page 8-18).

Mr. Miller, ALUC liaison, acknowledged receipt of the Draft General Plan Revised DEIR and related documents released 12/8/97 and, as staff representative for the ALUC, stated that no comments would be submitted at this time.

The Draft General Plan is consistent with the currently adopted Airport Land Use Compatibility Plan. The City's Draft General Plan and Revised DEIR have used the information in the adopted ALUCP as the basis for assumptions on noise impacts and the appropriateness of land use designations in the Draft General Plan. With regard to Stanly Ranch, the Airport Land Use Compatibility Plan establishes site design criteria and overflight easement requirements to enable development to achieve an acceptable level of compatibility. The ALUCP identifies four land use compatibility concerns: safety on the ground, hazards to aircraft flight, noise and overflight annoyance. The Aviation Compatibility Analysis by Shutt Moen Associates (January 1998), included as appendix B to this document, provides information to support the conclusion of General Plan consistency with the adopted ALUCP as follows:

> **1) Safety on the Ground:** Accident location data included in the 1993 Caltrans Airport Land Use Planning Handbook, demonstrate very few accidents lateral to the runway. The areas designated for potential development in the Stanly Ranch Planning Area are more than 5,000 feet north or west of the existing runways and approach zones. With regard to the need for open space for emergency landing, golf courses, parks, and parking lots (even when full of cars) provide emergency landing opportunities for the class of aircraft that use the Napa County Airport. The Specific Plan process for the Stanly Ranch has facilitated planning for sufficient

open space areas (clustered residential neighborhoods, golf course and extensive open space/resource areas along the Napa River) to satisfy emergency landing needs.

2) Hazards to Aircraft Flight: Hazards to aircraft flight fall into two main categories: 1) physical obstructions within navigable airspace; and 2) specific land use types and activities that can affect flight safety (distracting lights, sources of glare, smoke or electronic interference). In order to address these potential hazards, the ALUCP establishes land use compatibility zones that restrict the height of structures and the type and intensity of development activity in areas surrounding the Napa County Airport. The Stanly Ranch Planning Area includes lands within Compatibility Zones D, E and F. The land use designations in the Stanly Ranch Planning Area respond to these limitations. The PS (Public Serving) designation has been given to most of the area within Zone D, limiting the use of this area to primarily open space and trail use. The SFI (Single Family Infill 3-8 du/ac) designation has been applied to lands within compatibility Zone E and would allow the flexibility necessary for the design of residential units within the ALUCP criteria (clustering, height restrictions etc.) established for residential uses within that Zone. The TC (Tourist Commercial FAR not to exceed 1.00) designation is applied to the portion of Stanly Ranch that is within Zone F, allowing higher occupancy commercial/resort uses consistent with the density criteria of the ALUCP. Page 8-21 of the Draft General Plan Policy Document incorporates the ALUCP development limitations for these Compatibility Zones in Policies HS-6.1 through HS-6.6. The combination of consistent land use designation and the application of ALUCP development limitations through General Plan Policy address compatibility concerns related to aircraft flight hazards.

3) Noise: The industry standard for measuring aircraft noise is the "Community Noise Equivalent Level" (CNEL) method. This method uses a complex set of equations based upon factors that include single-event noise exposure, aircraft activity volume, runway utilization, flight patterns and time of day. While flyover noise levels are one component of CNEL contours, there is no direct correlation between an individual noise event and the CNEL contour for an airport. As shown in Figure 8-9 of the Draft General Plan Policy Document, the CNEL contours for the Napa County Airport do not encompass any land within the City's jurisdiction, including Stanly Ranch.

4) Overflight Annoyance: Consistency with the ALUCP does not mean that aircraft-related noise and overflight annoyance would not result in complaints by future residents in the Stanly Ranch Planning Area. The use of avigation easements and disclosure statements reduces the probability of noise complaints from future property owners and will reduce the likelihood that individuals highly sensitive to aircraft noise will live there. As described under heading #2 above, the land use designations of the General Plan, combined with the policies that implement the ALUCP requirements result in consistency between the two documents.

The Draft General Plan contains pertinent information from the ALUCP. Pages 8-18 through 8-21 of the Draft Policy Document specify the process and criteria that the City's land use planning must follow with regard to the Airport Land Use Compatibility Plan (ALUCP). Pages 8-33 through 8-36 of the Background Report provide additional detail regarding the ALUC and ALUCP. The policies and implementation programs under Goal HS-6 on page 8-21 re-enforce the provisions of state law regarding the City's responsibility to follow these processes. In accordance with these policies and the provisions of state law, the Stanly Ranch Draft Specific Plan and Draft EIR will be referred to the ALUC for comment when they are available for review.

The Commentator's specific claims regarding noise, safety and airport hazards relative to future development at the Stanly Ranch are addressed in the January 1998 letter by Shutt Moen Associates, the City's aviation consultant for the Stanly Ranch EIR (Letter included in Appendix B to this set of Responses). These issues will be responded to in detail in the Stanly Ranch Specific Plan EIR.

46. Tom Kambe, Stanly Ranch January 20, 1998

46.1G Commentator refers to the Stanly Ranch background information in the 12/8/97 Response to Comments and notes that the City's EIR consultant began the preparation of the Draft EIR for Stanly Ranch in June 1997.

Response: Comment confirmed; no response necessary.

46.2G Commentator refers to the 12/8/97 Response to Comments related to the description of the existing mature eucalyptus windrows at Stanly Ranch and notes the recent discovery of a borer infestation that would affect whether these trees will remain as part of the project.

Response: *See 12/8/97 Response to Comment Document pages 9 through 13 regarding the Stanly Ranch.* Commentator provides an update of information that has been acquired through the EIR process that is currently underway for the Stanly Ranch Specific Plan. Whether the project proposal includes preservation of the Eucalyptus trees or their replacement with new trees, the Stanly Ranch Specific Plan must stay within the General Plan policy framework with regard to visual impacts.

46.3G Commentator acknowledges the revision to Policy CS-10.3 related to the Napa Sanitation District's ability to serve new development and states it is his understanding that the revised policy would not preclude construction of an on site wastewater treatment facility to serve Stanly Ranch.

Response: The commentator is correct. Neither the current nor Draft General Plans contain policies that preclude development of private wastewater facilities in the event that the Napa Sanitation District notifies the City that a critical wastewater situation exists.

47. James O'Loughlin January 19, 1998

47.1G Commentator states that Response 13.7E in 12/8/97 Response to Comments is wrong and describes his understanding of the process and potential risks related to a development proposal for the Stanly Ranch.

Response: Response 13.7 in the 12/8/97 Response to Comments is not meant to imply that there is a vested right for project approval on the Stanly Ranch property. It describes the existing jurisdictional circumstances of the property and the potential development assumptions used for modeling purposes for the General Plan Draft EIR. The City is obligated by state law to designate land uses in its General Plan for all territory within its jurisdiction. The Stanly Ranch has been incorporated land within the City's boundaries since 1964 and, as such, land use for the area must be considered in the City's General Plan and EIR. Regardless of the designations in the Draft General Plan, the Stanly Ranch project must stand on its own merits when the time comes for public hearings on the Specific Plan and EIR.

The City has the following response to the commentator's statement that, *"After the Longwood Ranch case, annexations to the City of Napa Sanitation District are subject to initiative. The Stanly Ranch is not annexed to the Napa Sanitation District.":*

The commentator is mistaken that a LAFCO decision to approve annexation of Stanly Ranch to the Napa Sanitation District (NSD) would be a proper subject of an initiative measure. By "the Longwood Ranch case", the commenter apparently means to refer to Norlund v. Thorpe (1973) 34 Cal. App. 3d 672, in which, twenty-five years ago, the Court of Appeal upheld the right of city residents to subject to referendum the City of Napa's approval of the annexation of a 99-acre area known as Longwood Ranch. In reaching its decision, the Court reasoned that, although "the general subject of annexation by cities is, of course, a matter of statewide concern, . . . no one annexation by a particular city can be so denominated." (Id. At p. 674.) Had the matter been one of statewide concern, established legal principles would have prevented the exercise of the local referendum power, which is limited to matters of local concern. (DeVita v. County of Napa (1995) 9 Cal. 4th 763, 776.)

The reasoning of Norlund v. Thorpe has been repudiated by both the Legislature and subsequent Court of Appeal decisions. In 1977, the Legislature rewrote the laws governing LAFCO actions such as annexation approvals. The new set of statutes was collectively known as the Municipal Organization Act of 1977 ("MORGA") (former Gov. Code, §§ 3500-35500). MORGA superseded the Knox-Nisbet Act of 1965, which had been in effect when Norlund was decided. MORGA was later reorganized and renumbered as the Cortese-Knox Reorganization Act of 1985 (Gov. Code § 65000 et seq.). In Ferrini v. City of San Luis Obispo (1983) 150 Cal. App.3d 239, 247-248, the Court of Appeal characterized Norlund as no longer being good law when it rejected as invalid an initiative measure that would have required voter validation of an annexation previously approved by LAFCO. The Court noted that the Legislature had repealed the statute that had authorized the agency action at issue in Norlund. The statutory change "overrule[d] Norlund as precedent.

As set forth in Ferrini and subsequent cases, the law is now clear that "matters relating to the annexation of territory to a municipality are not municipal affairs", but are instead "matter[s] of statewide concern". (L.I.F.E. v. City of Lodi (1989) 213 Cal. App. 3d 1139, 1145.) In the L.I.F.E. decision, the Court of Appeal amendment effected by popular vote must precede a city's decision to annex land in a greenbelt area. Said the Court: "a local ordinance allowing city voters to pass judgment on proposed annexation proceedings is inconsistent with the statutory scheme for annexation." (Id. at p. 1146) In short, a decision by Napa County LAFCO to annex the Stanly Ranch property or any other property to the Napa Sanitation District is not subject either to referendum or to initiative.

47.2E Commentator refers to text in section 4.2 on page 4-1 of the Draft EIR and questions the validity of the environmental conclusion that no effects were found to be significant with regard to traffic.

Response: *See 12/8/97 Response to Comments, Standard Response Transportation (pages 14 & 15).* It appears that the comment is directed to the Draft EIR prepared in 1996. The 12/8/97 Revised Draft EIR includes a revision to the "significance conclusion" regarding traffic. The text referenced by the commentator has been struck and replaced with text that concludes there is a significant effect; the relevant section is found on page 4-1 of the Revised Draft EIR and demonstrates the modified conclusion using strike through and underline text. The new text regarding traffic conclusions now reads:

2. The SR 221 - SR 29 intersection would continue to operate at Level of Service F, largely due to cross-county traffic between Solano and Sonoma Counties. (Significant) In addition, uncertainty of funding for transportation improvements and city trips that impact roadways outside the city limits may create potentially significant impacts. (Potentially Significant) .....

The continuing congestion at the SR221 -SR29 intersection is unavoidable from the City's perspective since the condition is largely due to cross-county traffic between Solano and Sonoma Counties, which is beyond the control of the City of Napa.

48. Sierra Club, Napa County Group January 21, 1998

48.1E Commentator questions whether the Revised DEIR has been submitted to the Napa County Airport Land Use Commission (ALUC) for comments and refers to information recently presented to the ALUC regarding flight paths, compatibility zones and noise contours, suggesting that the General Plan EIR needs to address the significant impacts of the new information presented to the ALUC.

Response: *Refer to Response to Comment 45.1 and 12/8/97 Response to Comment 27.4.* The City transmitted a copy of the Revised DEIR to the Napa County Airport Land Use Commission as part of the agency circulation process on December 8, 1997. Mike Miller, Deputy County Planning Director and ALUC liaison, acknowledged receipt of the Draft General Plan Revised DEIR and related documents released 12/8/97 and, as staff representative for the ALUC, stated that no comments would be submitted at this time. No written comments were received from the ALUC.

48.2E Commentator requests that the aesthetic impacts of residential hillside development, particularly to neighborhoods in the westernmost portion of the city, be addressed at the General Plan EIR level and that the current location of the RUL in this area leaves steep hillsides and promontories available for residential development.

Response: Chapter 3.6 of the Revised Draft EIR evaluates the potential for visual impacts of development allowed by the Draft General Plan and recognizes the importance of the natural setting and hillside views as an asset for the city. Policy LU-9.1 is identified in the analysis as a mitigation for potential visual impacts of development on the natural setting and reads: "*The City shall promote an urban form that integrates the urban environment with the city's natural features*". Other policies under Goal LU-9 continue to support the city's regulations that apply special development standards to sensitive areas (LU-9.2), including hillsides shown on Figures 8-3 and 8-4 of the Policy Document as referenced in the comment. Policy LU-9.4 allows for consideration of cluster forms of development in environmentally-sensitive areas and Policy LU-9.5 allows the City Council to reduce the size and scale of a project if they find that there is a specific physical or environmental constraint on a project site (as demonstrated by the referenced figures). Page 3.6-3 of the RDEIR also identifies several policies and implementation programs under Goal NR-1 of the Draft Policy Document as a means of preserving visual character through the protection and enhancement of natural features, such as significant groves or clusters of trees on project sites (NR-1.7), and by applying the Conservation and Safety Regulations of the City's Zoning Ordinance to properties with specific natural constraints as well as providing opportunities for project enhancement of natural features (Implementation Programs NR -1.A, 1.B and 1.C).

The suggestion to reduce the existing extent of the RUL is a policy recommendation that can be presented to the City Council during hearings on the Draft General Plan. The Draft Plan does not propose to alter the RUL in the hillside areas in the western part of the City; however, in some cases the Draft General Plan reduces the potential density of residential development in these areas from what is allowed with the current General Plan as shown for hillside pods in the table below.

Draft General Plan Land Use Designation / Density*		1982 General Plan (Current Plan) Land Use Designation / Density**	
SFR-53	0-1 du/ac	ER	0-3 du/ac
SFR-54	0-2 du/ac	ER	0-3 du/ac
SFR-40	0-2 du/ac	ER	0-3 du/ac
SFR-123	0-2 du/ac	ER	0-3 du/ac

* net area **gross area

All of the areas identified in the above examples will continue to be subject to the Hillside and Erosion Control Overlay Zones (:HS and : CR-1). The 12/8/97 Response to Comments 26.1, 27.6, 27.10, 27.15, 27.20, 27.33, 27.37, 27.38, 27.39,27.59, also address similar comments regarding hillside development.

48.3E Commentator notes recent information regarding the possible removal of Eucalyptus trees from Stanly Ranch and believes that the General Plan EIR should address the visual impacts that would be caused by development should the trees be removed.

Response: *See Response to Comment 46.2* The General Plan does not "cause" the removal of the eucalyptus trees on the Stanly Ranch. A borer infestation has been discovered, leading to consideration of their removal for safety reasons. It is possible, given the current regulatory framework, that the infested trees could be removed in the absence of any development, particularly the trees within the public right-of-way along Stanly Lane. Under such a scenario, adoption of the General Plan does not "cause" visual impacts associated with the removal of the trees.

48.4E Commentator refers to a recent communication to Airport Land Use Commission regarding aircraft generated noise and requests that the General Plan EIR address the significance of aircraft noise on future residents of Stanly Ranch based on the information submitted to the ALUC.

Response: *See Response to Comments 45.1 and 48.1.* It should be noted that the ALUCP shows that the CNEL noise contours are less than 55 CNEL for any of the airport zones applicable to Stanly Ranch. A CNEL of 55 dBA or less is identified as "normally acceptable" for single family uses in the Draft General Plan Noise Element (ALUCP noise diagram included as Figure 8-9 on page 8-19 of Draft Policy Document; noise compatibility standards can be found on page 3.11-5 of the RDEIR and page 8-27 of the Draft Policy Document).

48.5E Commentator expresses concern that the Revised DEIR does not adequately address the impacts of pesticide use within the City on water quality and wildlife and suggests supplementing the proposed Draft General Plan policies on this subject.

Response: Chapter 3.9 of the Revised DEIR includes analysis of water quality impacts. One of the significance criteria listed is "*substantial degradation of water quality (including siltation from erosion), pursuant to CEQA Guidelines, Appendix G (f and q)*". Analysis under impact # 2 on page 3.9-2 and -3 of the RDEIR recognizes the potential for a small amount of waterborne pollution discharges (which includes pesticides and fertilizer). This small amount of domestic discharge will not amount to a "*substantial* degradation of water quality" within the meaning of Appendix G to the CEQA Guidelines. The Draft Policy Document lists several policies in the Community Services Element which establish mitigation methods for addressing this ongoing potential and reducing the impact to less than significant levels. Policy CS-11.5 requires the City to develop a stormwater management program to reduce water borne pollution discharges consistent with the requirements of the Regional Water Quality Control Board's Basin Plan; Policies CS-11.6 and CS11.7 require new development to obtain NPDES permits and implement best management practices in accordance with federal law. In addition, Policies NR-1.9 and NR-1.10 on page 7-5 and Policies under Goal HS-7 on page 8-22 of the Draft Policy Document require the continuance of hazardous waste collection programs to allow the public to safely dispose of pollution-causing products and support the pursuit of new management practices for reducing pollution from urban activities. Finally, policies under Goal NR-4 on page 7-9 of the Draft Policy Document are specific to preserving water quality and reference is made to other water quality policies in the Community Services and Natural Resource Elements. Goal NR-3 on page 7-7 of the Draft Policy Document is followed by public education policies for natural resource protection. The commentator's suggestion could be

included under this goal as an additional policy specifically addressing education on the use of domestic pesticides and fertilizers. These policies and existing regulatory requirements will drastically reduce, if not wholly eliminate, the extent to which chemicals applied to land within the City will find their way to the Napa River and other water bodies.

With regard to golf courses, the policies itemized above would certainly not allow an increase in any pesticide application which may currently be occurring at the Kennedy Park golf course (City property), and might lead to decreased applications. The golf course proposed for the Stanly Ranch will be addressed in the EIR for that project, with the likelihood that mitigation measures will be proposed to control pesticide application.

The City Public Works Staff has provided the following additional information regarding the Storm Drainage Master Plan:

The City of Napa Public Works Department, the Napa County Public Works Department and the Napa County Resource Conservation District are preparing a Storm Drainage Master Plan to study the localized flooding problems in the City of Napa and prioritize construction projects which will reduce flooding. A committee is being formed to help with the tasks of identifying potential projects and reviewing the prioritization of projects, Master Plan, environmental document and Financing Plan.

The intent of the Master Plan is also to address methods of improving water quality in the Napa River watershed and reduce storm drain maintenance costs. Part of the process is to create rainfall-runoff models, enter the drainage systems into a Geographical Information System, and prepare a budget for the annual storm water system service fee, which is levied on every parcel in the City.

A draft of the Water Quality chapter of the Storm Drainage Master Plan has been forwarded to the California Department of Fish and Game and the San Francisco Bay Regional Water Quality Control Board for comments. Pesticide use will be addressed in their comments or the commentator can comment on the environmental document for the Storm Drainage Master Plan.

49. San Francisco Bay Regional Water Quality Control Board January 21, 1998

49.1G Commentator feels that sections of the General Plan lack specificity in implementation measures needed to direct various departments to protect and enhance water quality in the Napa River and its tributaries.

Response: See response to Comment 48.5. This will be addressed in the Storm Drainage Master Plan. The City is beginning preparation of the Storm Drainage Master Plan and has been coordinating with the Regional Water Quality Control Board to determine the extent of water quality related issues that need to be addressed in the Master Plan. The Phase II requirements have not yet been formalized by the EPA. On January 9, 1998, the USEPA published the proposed Stormwater Phase II rule in the Federal Register. The Stormwater Phase II Program is made up of six elements designed to result in reduction of stormwater pollutants. Currently, the six elements are:

- Public education and outreach on stormwater impacts
- Public involvement/participation
- Illicit discharge detection and elimination
- Construction site stormwater runoff control
- Post-construction stormwater management in new development and redevelopment

- Pollution prevention/good housekeeping for municipal operations

The six management categories are scheduled to be finalized and promulgated on March 1, 1999. Under the proposed rule, the City must apply for coverage under the National Pollutant Discharge Elimination System (NPDES) permit within three years and 90 days from the date of publication of the final rule; therefore the program is scheduled to take effect on May 31, 2002.

The USEPA is proposing that NPDES permitting authorities specify a time period of up to five years from the issuance date of an NPDES permit for regulated small municipal separate storm sewer owners to fully develop and implement their storm water programs. Based on May 31, 2002 as a deadline for permit applications, the City could have up to May 31, 2007 to fully implement a program. City staff will monitor the progress of the proposed regulations.

It should be noted that the City's ongoing coordination with the Regional Board in the preparation of the draft Storm Drainage Master Plan has modified the Regional Board's concerns. Please refer to Appendix C in this Response Document, which contains a follow-up letter (dated April 15, 1998) from the Regional Board. The letter states:

> **"In our letter of January 21, 1997[8], we expressed disappointment in the level of specificity contained in the Revised General Plan, especially as it pertained to non-point pollution and water quality. Recently, we received a portion of the draft Storm Drain Master Plan that addresses many of our concerns. Therefore, [it] would appear that the Storm Drain Master Plan is a more appropriate place [to] describe the City's urban runoff program.**

In an effort to clarify the City's intent and to address the Regional Board's concern, an addendum to the Draft Policy Document will be prepared to revise the discussion of the Storm Drainage Master Plan as follows:

Draft Revision to Implementation Program CS-11.A
Pg. 4-15, Draft Policy Document

CS-11.A The City shall prepare a Storm Drainage Master Plan. The Scope of the Master Plan should include:

Hydrologic Information and Recommendations

1. Documentation of existing facilities and conditions
2. Development and adoption of standard methodologies for future system design.
3. Production of a Storm Drainage Base Map with estimated design flow at critical points.
4. Hydraulic Analysis of the City system
5. Identification of problem areas and prioritization of improvements (Projects completed as funding permits)

Water Quality Evaluation and Recommendations

1. Documentation of current and anticipated regulations
2. Runoff water quality management program including the following components:
   a. Existing City Programs, including Stormwater Service Fee, SWPPP and NOI requirements for projects over 5 acres, street sweeping, drain stenciling, pesticide certification for employees, implementation of erosion control measures
   b. Five year schedule and costs for implementation
   c. Refinement of General Plan policy implementation programs as needed
   d. Pursuit of funding for water quality education program

e. Identification of standards for erosion control design and implementation
f. Bioengineer bank stabilization projects in cooperation with the Flood Control District
g. Identification of small development standards for trash enclosures and other sources of runoff contamination

49.2E Commentator finds that the General Plan does not fully assess the impacts of new development on wetlands and other sensitive habitats.

Response: It should be clarified that the purpose of the General Plan is to establish policy and programs, not to assess environmental impacts; it is assumed that the comment is directed to the Revised DEIR. Chapter 3.7 of the Revised DEIR evaluates potential impacts to wetlands and other sensitive habitats that may be caused by development allowed by the General Plan. The significance criteria listed on page 3.7-7 include evaluation of endangered animal species and habitat for wildlife and/or plants and the potential for reduction in area or quality of jurisdictional wetland. The analysis that follows on pages 3.7-8 and 3.7-9 includes references to specific policies in the General Plan that mitigate the potential for new development to impact these resources. Since the comment is general and does not specify where the environmental assessment is believed to deficient, it is not possible to provide a specific response. The City looks to the commentator's agency, the Regional Water Quality Control Board, for guidance regarding specific policies and programs that will further water quality goals. The City has incorporated the known policy requirements of the RWQCB in the Community Services and Natural Resource and Health and Safety Elements of the General Plan as specified on pages 3.7-7 through 3.7-9 of the RDEIR. See also Response to Comment 48.5.

Even though the level of analysis and mitigation of a General Plan EIR is at a program level and is not intended to assign detailed mitigations to address project level impacts (See page 4 of 12/8/97 Response to Comments) the City has considered the views of the Regional Board and other commentators and realizes that, as a theoretical matter, the proposed General Plan policies cannot guarantee the avoidance of all adverse effects on listed species and that this results in an unavoidable significant impact. As a result the city has determined that it would be beneficial to clarify policies in the General Plan related to sensitive species and habitats and to refine mitigation in the form of implementation programs that focus on the potential means for avoiding the loss of habitat or habitat value. This is not new information, but helps to clarify and improve the current project level CEQA review process to ensure the process includes triggers for early review of the potential impact and that accurate information is available on which to base a decision. An addendum to the Draft Policy Document will be prepared to refine language in the Natural Resource Element as follows:

Add Policy

NR-2.4 When acting as a project proponent or when reviewing proposals for private projects requiring discretionary review by the City, the City shall ensure that its environmental review documents identify any feasible means of avoiding any net loss of habitat or of habitat value for endangered, threatened, and rare species. Where necessary or desirable, such avoidance can be achieved through off-site mitigation measures. As part of the environmental review, the City shall determine whether the Department of Fish and Game, in implementing the California Endangered Species Act, and/or the United States Fish and Wildlife Service, in implementing the Federal Endangered Species Act, will likely require mitigation sufficient to avoid any net loss of habitat or of habitat value for such species. Where these agencies are likely to require such a level of mitigation, the City may formulate its own mitigation measures so as to minimize the extent to which those measures duplicate the efforts of these agencies.

Add Implementation Programs under NR-2 as follows:

NR-2.A The City shall update its CEQA Initial Study Form to include specific questions that trigger review of the potential for impact on endangered species or sensitive habitat known to exist in the City of Napa.
Responsibility: *Planning Department* ***Time Frame:*** *98-Ongoing*

NR-2.B The City shall prepare and maintain a set of resource maps identifying known locations of rare and endangered species and sensitive habitats for staff use as a reference during the Initial Study review of individual projects.
Responsibility: *Planning Department* ***Time Frame:*** *99-Ongoing*

This information will also be incorporated into the text of the Final EIR after the public hearing process is completed for the General Plan and CEQA documents.

49.3G Commentator is disappointed that the City did not focus attention on the river as a discrete planning element, embracing the vision of a river-front theme as expressed by the *Friends of the Napa River* in their comment letter.

Response: *See 12/8/97 Response to Comment Document page 23, Standard Response Flood Control.* As mentioned in the above response, the City Council can direct that the General Plan be amended in the future to reflect the objectives and programs of an adopted flood control project. The Draft General Plan policies do not contradict the current objectives of the living river concept supported by *Friends of the Napa River.*

49.4G Commentator states that the impacts of storm-water pollution and new home construction are only partially addressed in the General Plan with only brief mention of water quality goals and no details as to how requirements for NPDES permits and Best Management Practices are incorporated into everyday review

Response: *See Response to Comment 48.5 and 49.1.*

The Storm Drainage Master Plan will include details regarding water quality regulations and programs and their implementation. It will also include existing and proposed components for a water quality management program for Napa. Additional language has been recommended for Implementation program CS-11A in the Community Services Element that clarifies the necessary water quality related components of the Storm Drainage Master plan (see Response to Comment 49.1).

49.5G Commentator is encouraged by the Draft General Plan objectives and policies which acknowledge the need for urban development to be sensitive to resources but expresses concern that these measures will not be incorporated into City policies and guidelines to build an effective urban storm-water pollution control program.

Response: *See Response to Comments 48.5, 49.1 and 49.2.*

49.6G Commentator suggests that the General Plan briefly describe how the City will ensure that project applicants obtain federal and state permits, clearances, etc. and how the City will monitor compliance after the permits have been issued so that water quality effects can be mitigated to a less than significant level.

Response: *See Response to Comment 48.5 and 49.1.*

As discussed in Response to Comment 48.5, Chapter 3.9 of the Revised DEIR includes analysis of water quality impacts and clarifies that the significance criteria is based on the threshold provided in CEQA Guidelines Appendix G. ("substantial degradation of water quality") The conclusion of the RDEIR that water quality impact are reduced to an insignificant level is based on the analysis under impact # 2 on page 3.9-2 and –3 This discussion recognizes the potential for a small amount of waterborne pollution discharges (which includes pesticides and fertilizer); however, this small amount of domestic discharge is not considered to amount to a "*substantial* degradation of water quality" within the meaning of Appendix G to the CEQA Guidelines. The Draft Policy Document lists several policies in the Community Services Element which establish mitigation methods for addressing this ongoing potential and reducing the impact to less than significant levels. Response to Comment 49.1 recommends the refinement of Implementation Program CS-11.A to clarify how the Stormwater Master Plan should address water quality issues.

49.7G Commentator feels that the General Plan should encourage planning that embraces the river as a theme; that the Plan represent a commitment to caring for the overall health of the river system as a focus rather than merely one planning element (reference made to 12/8/97 Response to Comment 24.13G).

Response: Comment noted; although the subject of land use planning along the river is not within the regulatory domain of the regional board, the commentator's views represent a policy recommendation that can be presented to the City Council during hearings on the Draft General Plan. As noted under Response to Comment 49.3, the 12/8/97 Response to Comment document states that it is more reasonable to address the details of river planning when the critical questions related to flood control are answered with an adopted and funded flood control project. The Draft General Plan supports pursuit of this objective.

50. Susan Rushing-Hart
January 21, 1998

50.1G Commentator is concerned that citizens have not had sufficient time to review and comment on the General Plan documents, requests that an extension of time be provided for public review and notes that the separately bound documents require cross referencing.

Response: *See 12/8/97 Response to Comments pages 1 through 3* which provides an overview of the EIR process to date. See Draft Policy Document pages 7 through 8 and Draft Background Report pages 1-11 for information on community involvement in preparation of *Envision Napa 2020.* See Response to Comment 44.1 for clarification of the General Plan documents.

With regard to continued public involvement, the Revised DEIR, which included modifications that resulted from the public response process on the Draft EIR, was re-circulated for 45 days as required by State Law. This circulation period allowed for the City to solicit written comments from other agencies as well as the public. A specified period for submittal of written comments allows for the City to prepare another formal "Response to Comment" package as required by CEQA, prior to hearings. This does not preclude citizens from submitting written and oral comments throughout the public hearing process on the General Plan and RDEIR and comments may be made up until adoption of the General Plan. Future communications will be included in the administrative record of the hearing process, but, as a practical matter, cannot be included in the formal Response to Comments document prepared prior to the public hearings on the Plan.

50.2G Commentator expresses opposition to any plans to have the General Plan reviewed at only one meeting.

Response: The format for hearings on the General Plan has been explored by both the City Council and the Planning Commission. At their 2/26/98 Study Session on the Draft General Plan, the Planning Commission solicited public input regarding the most desirable format for Planning Commission hearings. The public was invited to comment on the format and schedule for the hearings throughout the study session process which ended on 4/2/98. On 4/16/98 the Planning Commission formally endorsed a schedule for their hearings and deliberation on the Draft General Plan as follows:

Public Hearing:	Thursday, May 7 & Friday, May 8; 6 to 10 p.m. and Saturday, May 9; 9 a.m. to 1 p.m.
Deliberation:	Thursday, May 28 & Friday, May 29; 6 to 10 p.m. and Saturday, May 30; 9a.m. to 1 p.m.
Recommendation To City Council:	Thursday, June 25 & Friday, June 26; 6 to 10 p.m. Thursday, July 9 & Friday, July 10; 6 to 10 p.m.

After recommendation by the Planning Commission, the City Council will begin hearings and deliberation of the Draft General Plan

50.3G Commentator feels that the 12/8/97 Response to Comments overlooked her questions and suggests that additional public input is needed to evaluate issues such as RUL adjustments, flooding and roadways.

Response: *See Response to Comment 50.1.* The planning process for the General Plan began in 1991 with the appointment of a 19 member Citizen's Advisory Committee (CAC) that met in 55 meetings over a 2 year period to discuss fundamental issues and concepts for the City's land use objectives for the next 25 years. This was followed by several community meetings for review and discussion of the CAC's Concept Report. The "vision" for the General Plan was published in the City Council's Concept Report and has been available for public review since March 1994. The Draft General Plan Policy Document, Background Report, Fiscal Analysis and the first Draft EIR were released in the Fall of 1996 and have been available for review and comment since that time (two public hearings were held for the Draft EIR and the CEQA review period was extended from 45 to 60 days. The Revised DEIR was a direct result of the public review and comment process on the DEIR (a process that resulted in public input in the form of over 400 separate comments). The Revised DEIR, Response to Comments and Addenda to the Draft General Plan have been subject to another 45 day review period, and comments on all of these documents may still be submitted during the public hearing process up until the General Plan is adopted. The hearing process is expected to continue for at least another 7 months prior to adoption. Public input on all issues is integral to the adoption of a community's general plan and, as demonstrated above, has been incorporated into this general plan process.

It should be noted that three pages (pages 52-56) of the 12/8/97 Response Document are devoted to individual responses to each of the commentator's concerns and that pages 77-78 responds to a second letter submitted by the commentator. Some of the comments lacked sufficient detail to enable a comprehensive and focused response.

50.4E Commentator repeats concern regarding flooding and references the 12/8/97 Response to Comment document pages 23-25 and response to individual comments 2.3 and 19.1, stating that the comments are not adequately addressed.

Response: *See response to Comment 48.5E.* The Flood Control Project does not include Salvador Channel within the "Project Reach", but flooding problems at Garfield Lane may be addressed in the Storm Drainage Master Plan.

The retention ponds at South Napa Marketplace was referenced in prior responses as an example of how the City is implementing measures, through project review, to address project peak run-off and water quality.

The retention pond designed for the Silverado Creek project was based on flood assessment information prepared for the Big Ranch Road Specific Plan EIR by William B. Vandievere, and studied Salvador Channel from Trower Avenue to Big Ranch Road. The run-off calculations assumed a peak flow into the Big Ranch area based on the 100-year flow estimates from the City Public Works Department. These estimates were based on development projections for the Linda Vista Area that were equivalent to, or exceeded, the development potential of the current 1982 General Plan. Development potential projected for the Linda Vista area in the Draft General Plan is essentially unchanged from the 1982 plan. Page 82 of the Big Ranch Specific Plan EIR (available at the Planning Department) describes how the 100-year flood design was established. The Big Ranch Road Specific Plan requires runoff flow rates from the Specific Plan area to not exceed "pre-development" peak flow rates, so that the combined flow from the project area would not be significantly increased. Based on this analysis, the Silverado Creek retention pond was designed to retain flows from the Big Ranch project to pre-development rates; flows from future Linda Vista development were included in the calculation in the 100 year flow estimates that were based on maximum buildout of the Linda Vista Area.

50.5E Commentator expresses concern that additional runoff from the North/North-Western areas will be diverted through the Salvador Channel and states that the channel cannot contain more runoff.

Response: *See response to Comment 48.5E and 50.4E.*

50.6E Commentator refers to the two areas along Trancas Street proposed to be included in the RUL and seeks clarification regarding drainage from these areas.

Response: Drainage for these two parcels would follow the current pattern to the Napa River until developed. Project level drainage analysis would be required of any proposed development.

50.7E Commentator notes inconsistencies between the Revised DEIR page 2-16, "Growth Forecasts for the Year 2020, Table 2-3 related to the projections in the Linda Vista and Vintage Planning Areas and the 12/8/97 Response to Comment document page 52, response 19.1E describing the maximum potential development related to stormwater diversion for these same areas. Clarification is requested.

Response: . The commentator is incorrectly comparing statistics for two different things. The higher percentages the commentator makes reference to in the RDEIR, page 2-16, Table 2-3, demonstrate the increase in total dwelling units in the Linda Vista and Vintage areas (this increase would also occur with the current General Plan). Runoff potential is not directly related to the number of dwelling units but is based on the amount of increased hard surface area. The acreage available for development in the

Linda Vista and Vintage planning areas is not changed except for the RUL addition at Trancas and Big Ranch Road (low end of the watershed of these planning areas). The original response provides estimated percentages for increased development of hard surface area in terms of developable acreage and the result is a smaller percentage. Storm water runoff is a function of actual area, not number of dwelling units.

50.8G Commentator points out that the Revised DEIR Section 3.3 and Table 3.3-3 does not accurately reflect the street connections approved with Big Ranch Specific Plan relative to Sierra Avenue and Villa Lane.

Response: Comment noted. The Revised DEIR was modified to include the details presented in Addendum #3. Addendum # 3 incorporates the details of the adopted Big Ranch Specific Plan into the Policy Document and incorrectly shows Sierra Avenue extending to Salvador Channel. This information will be revised in the final General Plan documents to accurately reflect the roadway arrangement adopted with the Specific Plan. Specifically, Sierra Avenue will not be shown extending to the Salvador Channel.

50.9G Commentator summarizes the points stated in this communication and expresses concern that the passage of Measure A (flood control tax) will be an incentive for the City to increase development within Napa.

Response: *See 12/8/97 Response to Comments, Response 27.60 and these Response to Comments 49.3 and 49.7.* The Draft General Plan designates land uses for all of the land area within the existing floodplain and floodway of the Napa River and, until changed, the existing zoning will remain in place for these areas. In addition, the current regulations (Flood Plain Overlay District, Flood Evacuation Zone etc.) that limit development in these areas will remain in place until public safety is provided by some other means. Physical protection will not occur with the passage of Measure A, but only after an actual flood control project is constructed.

51. Kelly and Chester Gin, et.al. January 17, 1998

51.1G Commentator opposes plans to connect Terrace Drive over Cayetano Creek as a listed future road project in the Draft General Plan and attaches a petition signed by 38 neighbors.

Response: The Terrace Drive extension over Cayetano Creek is identified in the current General Plan as an Implementing Action to comply with Napa's policy to provide a continuous network of arterial streets and a continuous sub-area of collector streets. As stated in the General Plan, "That system of designated circulation streets will allow traffic to choose logical and reasonable direct paths to destinations, prevent undue concentrations of traffic on a few streets, prevent incursions of unwanted through traffic onto streets intended purely for local residential access, provide efficient community wide accessibility for transit, emergency and other service vehicles and allow for the development of reasonably sized market areas for neighborhood commercial centers." The Draft General Plan also includes the Terrace Drive extension as a policy to implement goal T-1 which states, "To provide for extension and improvement of the City's roadway system to ensure the safe and efficient movement of people and goods."

The elimination of the Terrace Drive extension is a policy matter that can be presented to the City Council during hearings on the Draft General Plan. If the City Council chooses to delete the Terrace Drive extension by revising Goal T-1 or by determining that Goal T-1 can be met without the Terrace Drive

extension, then a traffic analysis would be required to identify potential impacts to the area-wide circulation system and to surrounding intersections.

The "General Plan policies invoked by the commentator are quite general in character, do not specifically deal with bridge crossings, must be reconciled with other policies within the Plan, and must ultimately be interpreted by the City Council. The construction of such a bridge would be a discretionary action requiring its own environmental review, and include analysis of potential impacts to any sensitive species or habitat. A future bridge project would be subject to project level environmental review and would also need to comply with the additional policies related to endangered species that have been added under Response to Comment 49.2. These measures would influence the design of the bridge so that potential impacts could be avoided or mitigated to reduce their significance.

52. The California Native Plant Society January 20, 1998

52.1E Commentator references 12/8/97 Response to Comments, Response 11.2 regarding the calculation of the projected population in the Draft General Plan.

Response: In the 12/8/97 Response to Comments, Response 11.2 states that the 1973 plebiscite was an advisory ballot measure. It was placed on the ballot due to concern over the rapid growth that the City had experienced in the early 1970's. Later, the results of the plebiscite were used by the City Council to establish growth policies for the 1975 General Plan (which extended to the year 2,000). These same policies were continued in the 1982 General Plan. Some community members share the commentator's opinion that the ballot measure constituted a vote to "cap" the city's population at 75,000 permanently. The ballot language is not prescriptive regarding an absolute population cap. However, the Draft General Plan now looks to the year 2020, incorporates the same growth management policies, but recognizes that a moderate level of growth will continue on the undeveloped land within the RUL. The City has proceeded with this General Plan based on the recommendations of the CAC and the concept endorsed by the City Council.

The commentator attempts to find balance between the estimated 2020 population projection, the dwelling unit capacity of the plan and the persons per household assumption found on page 1-25 of the Draft Policy Document. The average number of persons per dwelling unit is assumed to be 2.54 based on the 1990 Census data. This number is a theoretical average and will continue to fluctuate as social and economic patterns influence residential use in the City. It is not intended to be used to project population and, as stated in the Policy Document, it does not represent City policy. The City has virtually no control over actual household size.

The dwelling unit capacity for the Draft General Plan is based on an inventory of vacant and partially developed land within the RUL, estimates of development and redevelopment potential by pod and housing type, and assumptions about future family size. The projection is a theoretical maximum, used to evaluate "worst case" conditions for traffic, water consumption, storm water runoff and other effects of urban development. The population projection, on the other hand, is intended to provide a more realistic forecast and factors in past and anticipated growth trends, regional and other influences similar to the criteria used by ABAG. The population projection also recognizes that not all of the infill development will be built to capacity within the term of the Plan. Finally the CAC considered several population thresholds and looked at the population projection as a cap rather than a goal.

52.2E Commentator references 12/8/97 Response to Comments, response 11.3 and feels that more definite language must be included in the General Plan to provide for protection of grasslands and woodlands within the City and the County.

Response: The comment expresses concerns over the lack of effective regulations to preserve resources outside of the RUL. The City cannot adopt policies in its General Plan to address the protection of habitat in the County's jurisdiction as implied by the comment. Pages 3.7-7 through 3.7-9 of the Revised Draft EIR evaluate the potential impacts that might result from development allowed by the draft General Plan and include references to policies in the Land Use and Natural Resource elements of the Draft General Plan which serve as program level mitigations for the potential impacts that could occur within the RUL (refer to policies under Land Use Goal LU-9 and Natural Resource policies under Goals NR-1 and NR-2 on pages 7-4 and 7-6 of the Draft Policy Document). Response 27.17 in the 12/8/97 Response to Comments refers to possible programs for more permanent protection of greenbelt areas within the County. Although the City cannot guarantee protection of land outside the RUL which is subject to the County's land use jurisdiction, the intent of the RUL, as recognized by both the City and the County, is to try to contain most new development within the City's municipal boundaries. In this way, the City's maintenance of the RUL does tend to indirectly contribute to the preservation of land within the County.

52.3E Commentator expresses dissatisfaction with 12/8/97 Response to Comments, response 11.7E, stating that the General Plan should have some mechanism for proactive protection of natural communities inside the RUL.

Response: *See Response to Comment 52.2.*

52.4E Commentator references 12/8/97 Response to Comments, response 11.8E and states that the Department of Fish and Game Natural Diversity Database is sometimes 6 months to years behind in adding sensitive species although the data mentioned has been forwarded and is also available at the County Planning Department.

Response: Comment noted. As stated in Response to Comment 11.8, the most recent references available from the California Department of Fish and Game and the U. S. Fish and Wildlife Service, supplemented with other biological references, including the 1996 Natural Diversity Data Base, were used by the EIR preparers to establish the baseline information for environmental analysis of sensitive and endangered species. This is believed to be an adequate and "good faith" effort in obtaining reliable information for this environmental analysis. As suggested by the commentator, staff contacted the County Planning Staff and found that the basis for their sensitivity maps is also the 1996 Natural Diversity Data Base.

53. Louise Clerici
January 20, 1998

53.1G Commentator requests clarification of the residential density ranges in the Draft General Plan as compared with the densities allowed by the current General Plan.

Response: The overall ranges that might be possible within each land use type, such as SFR and TRI , are included in the descriptions of land use designations on pages 1-26 through 1-29 of the Draft Policy Document (these are the ranges listed in the comment). Within the land use categories, areas are divided into smaller geographic units or "pods" that specifically define the density and intensity of future

development. Each pod has been assigned an individual density range, which in most cases is much narrower than the overall density for the land use type. The narrower range is assigned based on an evaluation of the density and character of the specific neighborhood. The current General Plan does not provide this level of density refinement at a policy level.

53.2E Commentator requests that page references from the Revised DEIR be listed that discuss the significant impact related to agricultural uses and prime soils within the city's RUL.

Response: The chart referenced on page S-10 of the Revised Draft EIR is a summary of impacts and mitigation measures. The purpose of the mitigation column is to provide a reference to mitigations that are described for each impact. In the case of Item #4, no mitigation is available and therefore, no reference is given in the mitigation column. The commentator makes a good suggestion regarding the need for page references for tracking important issues throughout the General Plan documents. Staff has prepared a master index based on the primary issues that have surfaced in the public review process to date. This index will be included with the staff report prepared for the public hearings on the General Plan.

53.3E Commentator refers to Revised DEIR page 2-3, Figure 2-2 and requests that the legend be modified to clarify the overlapping shading/line designation on the diagram.

Response: *See 12/8/97 Response to Comments, Response 5.3.* Consideration will be given to clarifying graphics during preparation of final General Plan documents.

53.4E Commentator refers to Revised DEIR page 3.3-7 Table 3.3-3 "Future Roadway Improvements" and questions why the improvements designated in the North Jefferson Study Area are not included.

Response: The improvements listed in Table 3.3-3 "Future Roadway Improvements" are the future improvements which affect the results of the Napa County Travel Forecasting Model (Model) analysis. The remaining improvements to be constructed as a part of the North Jefferson Street Improvement Fee include only minor street widening and installation of sidewalks. Since these improvements do not affect the model, they are not listed in Table 3.3-3.

53.5G Commentator disagrees with the characterization of the result of the November 6, 1973 advisory ballot measure in the 12/8/97 Response to Comments, Response 11.2E regarding the application of the 75,000 population figure to the 1975 General Plan.

Response: *See Response to Comment 52.1.*

54. Napa County County Counsel January 21, 1998

54.1E Commentator states that the entire review process for the Revised EIR and General Plan is defective and that the comment period must be extended because the CMA did not receive a copy of the documents, thus making it impossible for the County to confer with CMA staff and adequately comment on traffic issues.

Response: The City has a certified, signed, return receipt, evidencing delivery of the documents to the CMA, sent to the attention of John Ponte on December 8, 1997. A copy of the receipt has been forwarded to the CMA and the commentator.

54.2E Commentator feels that the Revised DEIR continues to lack sufficient discussion of the regional setting and issues.

Response: *See 12/8/97 Response to Comments, Responses 13.2 and 13.11.* This comment is a repetition of comments previously submitted by the Napa County Counsel and does not raise new issues that have not already been addressed in the 12/8/97 Revised DEIR, Response to Comments and Addenda.

54.3E Commentator claims that the Revised DEIR fails to evaluate the regional effect of development within the City, particularly in the areas of air quality, water supply, wastewater treatment, growth induction and traffic.

Response: *See 12/8/97 Response to Comments, Response 13.3 and 13.12.* This comment is a repetition of comments previously submitted by the Napa County Counsel and does not raise new issues that have not already been addressed in the 12/8/97 Revised DEIR, Response to Comments and Addenda.

The previous responses resulted in the inclusion of Table 3.3-4 in the 12/8/97 Revised Draft EIR. This table provides a summary of conditions on a number of key intersections outside of the City of Napa. Text preceding that table covers the conclusions regarding regional impacts. This information addresses the concerns expressed regarding regional traffic impacts.

54.4E Commentator says that traffic analysis related to the effect of the Stanly Ranch development on the nearby highway intersection and other roadways in the region is inadequate.

Response: *See 12/8/97 Response to Comments pages 9 through 13, Standard Response Stanly Ranch; Response to Comment 8.1 regarding analysis of the highways in the vicinity of Stanly Ranch; Response to Comment 12.3 regarding Stanly Ranch traffic impact analysis.*

When the traffic analysis was initiated for the General Plan DEIR, a firm plan for the Stanly Ranch area had not been prepared. However, a general understanding of a development scheme for the Stanly Ranch had been developed by the property owner and discussed with the City. In the analysis of traffic for the buildout of the Draft General Plan, 600 single family residences were assumed to be included in the Stanly Ranch site along with components of a destination resort and wine related commercial uses. The general location and area for these anticipated uses is diagrammed in the Draft General Plan on the proposed land use map for the Stanly Ranch Planning Area (pg. 1-41 of Draft Policy Document). With these assumptions, the overall street and highway system in the vicinity of Stanly Ranch was analyzed at the same level of detail as all other parts of the City. The signalized intersection of SR12/29/121 is included in the DEIR analysis. The unsignalized intersection of Stanly Lane/SR 12/121 was not analyzed since stop-sign controlled intersections were not analyzed anywhere in the City in the General Plan traffic model. The analysis in the Stanly Ranch area is thus consistent with that performed in the remainder of the study area, and also contains a reasonable initial estimate of potential land use for the site. The commentator will have additional opportunities to comment on the merits of the Stanly Ranch development when the DEIR for that project is circulated for public review.

54.5E Commentator claims there are inconsistencies in the traffic impact conclusions in the Revised DEIR and as such it must be redrafted and re-circulated.

Response: This comment is a repetition of comment 13.5 of the 12/8/97 Response to Comments. *See 12/8/97 Response to Comments, Standard Response Transportation (pages 14 &15), Response to Comment 13.5 and Response to Comment 47.2 (this document).* The Revised DEIR has been revised to conclude that the current LOS F condition at the out-of-city intersection at SR221/SR29 will continue to be a significant impact. The following has been provided by the City's traffic consultant for the General Plan to further clarify the previous responses:

> Table 3.3-2 in the 12/8/97 Revised Draft EIR documents Service Levels at the major intersections in the City of Napa for three conditions: existing, 2020 unmitigated and 2020 mitigated. In all but one case, impacts are mitigated to the point that 2020 service levels would be LOS E or better. The single exception, the intersection of SR 29/221, is shown to operate at LOS F in all three conditions. This location has long been known as one of the key locations in the County and is currently identified as number 2 on the priority list of intersections in the county for improvement, following the intersection of SR29/ Trancas/Redwood. The causes of the LOS condition on this intersection are many, including components of existing traffic, projected traffic to and from the City of Napa, traffic to and from other parts of Napa County, and traffic traveling within Napa County but with origins and destinations outside of the County.
>
> Clearly, it is beyond the sole responsibility of the City of Napa to mitigate this condition. The City may well be obligated to contribute its fair share to a remedy , but that contribution can only come within the framework of a County-wide or sub-regional mechanism (such as the CMA or its successor) to solve the problems along the entire SR121 and 29 corridor. (Please note the proposed additions to the draft policy document outlined in Response 54.13 further clarify the city's intent to satisfy its fair share obligations.)
> With regard to the comment that the 2020 cumulative numbers differ significantly from those of the CMA, this is not correct. First, the CMA process is essentially a four to seven year process. Until recently, most CMA traffic estimates have been concerned with the year 2000. Only in 1997, at the time that the forecasts for this DEIR were being prepared, were CMA forecasts prepared for 2010. The year 2020 has no official standing in the CMA process. A "Deficiency Plan" study was prepared for the CMA which investigated conditions in the year 2020, but these results have not been formally published. Further, there is no logical reason why the CMA numbers should agree with the Napa General Plan buildout numbers. The Napa General Plan represents the City of Napa's policy for its development and buildout. While there have been legal requirements in the past that the numbers for the City coincide with the CMA for CMA purposes over a shorter time span, the CMA has no authority over the policies in the City of Napa General Plan with regard to buildout. As a matter of practical procedure, the agencies within Napa County have been working cooperatively to make their numbers consistent to the extent possible. However, until the General Plan for the City of Napa is adopted, there is no policy basis upon which to create a consistent data set. Such an action would be the logical consequence that follows the adoption of the General Plan, not a precursor to adoption.

54.6E Commentator believes that the Revised DEIR should provide analysis of sewage treatment capacity for development facilitated by the Draft General Plan, taking into consideration the capacity impacts associated with the Airport Industrial Area Specific Plan amendments.

Response: This comment is a repetition of concerns expressed in comments 13.14, 13.15 and 13.16 of the 12/8/97 Response to Comments. *See 12/8/97 Response to Comments pages 16 & 17, Standard Response Wastewater and Responses to Comments 13.14, 13.15 and 13.16.* This comment includes a challenge to the adequacy of the "will serve letter" mitigation presented in the 12/8/97 Revised Draft EIR. It should be noted that the County's Airport Industrial Area Specific Plan EIR imposes a similar mitigation to address the same NSD capacity problem for development contemplated by the Airport Specific Plan and concludes that there would not be a significant impact on wastewater services if such a mitigation is applied.

An environmental analysis for NSD capacity and associated facilities would address extremely site-specific issues based on project details that are currently unknown and beyond the control of the City. The City cannot predict now, with any degree of certainty such things as 1) the technology that NSD will be able to use in the coming years, 2) the water quality of the waters into which future treated effluent will ultimately be discharged, 3) the quality of effluent that will be generated after treatment with new technologies in the future, or 4) the regulatory standards that will be in place when a new NPDES permit is sought. It is not currently feasible for the City to provide detailed analysis of the issues identified above, and such analysis would constitute speculation at this time. It should be noted that the Napa Sanitation District has a legal obligation to generate capacity to serve the City and that the growth anticipated by the Draft General Plan is less than the growth projections used by NSD in their 1991 Master Plan.

54.7E Commentator claims that the Draft General Plan intensifies the use contemplated for the Stanly Ranch and that there has been no analysis of the impact of possible development. Further claims are presented regarding specific developments in the Airport Industrial Area, the Lucky Supermarket and the buildout of the South Napa Marketplace Shopping Center.

Response: *See 12/8/97 Response to Comments, Response 13.6.* This comment is a repetition of the comment previously submitted by the Napa County Counsel and does not raise new issues that have not already been addressed in the 12/8/97 Revised DEIR, Response to Comments and Addenda.

The City's traffic consultant for the General Plan has pointed out that this comment does not correctly characterize the actual process that was undertaken to analyze the impacts of the City of Napa General Plan. The plan is based on the planning team's best estimates of land uses that would occur in the City upon the buildout of the draft General Plan. For land uses outside of the city (including the Airport Industrial Area), a county-wide average projection to the year 2020 was developed by County staff (for inclusion in the county-wide traffic model), based on the best data available at the time. The City's General Plan traffic modeling method for areas outside the city was not intended to look at each project in great detail as was done by TAZ for areas within the City. It resulted in a county-wide average of the 2020 traffic picture. The county-wide average for 2020 went beyond the limits of projection data available through other sources (such as the adopted Airport Specific Plan, which included data to 2010). Based on this methodology, development at the Airport area was assessed in the 2020 picture as part of the overall county average.

As noted in Response to Comment 54.4, Stanly Ranch is included at the level of detail that was known about the project at the time that the analysis was completed. The development of the South Napa Marketplace is also included in the baseline data as is the Lucky supermarket (a very small project in the context of a citywide General Plan analysis). But beyond these small- to large projects, the analysis includes estimates in every traffic analysis zone (TAZ) of the amount of land use development that is expected to occur by the buildout of the General Plan. Further, the General Plan is "general" in the sense

that specific details of future projects cannot all be known in advance. The Plan looks over 20 years into the future, and the precise nature of the buildout cannot be known to the level of precision implied by the comment. The data used for the projection of the impacts of the General plan make the best use of available data, using processes conducted within the norms of professional practice.
In reference to Stanly Ranch, any future development will be subject to its own EIR which will evaluate project specific and cumulative traffic impacts based on the details of the Specific Plan. The development will be subject to Street Improvement Fees as required by City Resolution 89-362 (requires the collection of fees for all new development within the City of Napa to help mitigate city and area wide impacts to address the "cumulative" impact). Stanly Ranch will also be required to contribute its pro-rata share and/or construct needed phased improvements at the Highway 12/121/29 intersection for project related impacts.

54.8E Commentator believes that the development potential established for Stanly Ranch as well as inclusion into the RUL of the area at Big Ranch Road and Trancas are growth inducing, contrary to the County General Plan policies, and that sufficient analysis on the subject has not been included in the Revised DEIR.

Response: *See 12/8/97 Response to Comments, Responses 13.7.* This comment is a repetition of a comment previously submitted by the County Counsel.

54.9E Commentator objects to the proposal to include lands currently designated within the County's Agricultural Preserve into the RUL and Sphere of Influence. The commentator characterizes this proposal as a change in City Policy regarding open space. In addition, the comment charges that, by not providing housing within the urban boundaries for jobs created by the AIASP (unincorporated area) the City will cause the development of housing on unincorporated open space and agricultural lands.

Response: *See 12/8/97 Response to Comments, Responses 13.8 and 13.9.* Although updated, this comment is essentially a repetition of a comment previously submitted by the County Counsel. The commentator's concern that housing needs generated by jobs resulting from the County's Airport Industrial Area Specific Plan (AIASP) will eliminate open space outside the City of Napa is an impact directly created by the County's AIASP, not by the City's General Plan. The referenced "major change in the adopted environmental plans and goals of the City and County of Napa" is a result of considerable job growth in the airport area; ABAG's Projections '98 characterizes this growth as "substantial", ranking the County's airport area as among the Bay Area's top five subregional areas in terms of percentage of increase in jobs; the airport area is also expected to have the largest job growth in the entire county.

The commentator states that "the revised draft EIR documents continue to concede that the log standing practice of the City of Napa is to provide housing for individuals that wish to live I southern Napa County, including housing for workers in the unincorporated area. In its ongoing comments regarding the County of napa's proposed amendments to the AIASP the City has indicated it may no longer be willing to provide such housing in the future." The commentator then goes on to state that such an unwillingness may lead to the urban designation of unincorporated areas currently designated for open space, thus "constitut[ing] a major change in the adopted environmental plans and goals of the City and County of Napa that have been in place for many years."

The City disagrees with the implication that any requirement of either State law, the City's existing General Plan, the County's General Plan, or any other enforceable planning document requires the City to provide housing for all persons working in the unincorporated portions of the southern part of Napa County. It is true that, in past years, the mutual determination of both the City and the County to maintain the RUL, as well as the County's policies restricting development within the unincorporated

area, have combined to create a situation in which many people have worked in the unincorporated area while living in the City. The City has not legal obligation, however, to *guarantee* adequate housing for all persons working in the unincorporated area of southern Napa County regardless of how much commercial development the County approves without concomitant residential development. The County certainly lacks any legal authority, through its General Plan or otherwise, to impose such an obligation on a sister jurisdiction.

In its comments on the proposed AIASP changes, the City noted that one effect of a County decision to approve substantial amounts of new job-generating development without concomitant residential development in the unincorporated area would be to create a possible housing shortage that could not be alleviated through development of land within the City limits. The City made this comment so that the County would be aware that its proposal to revise the AIASP could have secondary consequences that must be addressed.

Nothing in State law requires a city within a county to accept all of the housing created by commercial, retail, or industrial activity within an unincorporated area. Rather, the main obligation in State law is that each city must designate sufficient land for relatively high-density development to permit, if the necessary funding materializes, construction of enough housing units for very-low, low, and moderate income persons to meet the city's "fair share" of such units, as set by the council of governments, if any, overseeing the city. (See Gov. Code, §§ 65913.1, 65583, subd. (a), 65584, subd. (a).) The California Department of Housing and Community Development has certified the City of Napa's housing element, adopted in 1991, as meeting these requirements. The City is not responsible for providing land sufficient to satisfy the *County's* "fair share" requirements. If the County is interested in working out an arrangement that would achieve such a result, County officials should approach City officials to seek their assistance.

Nothing in the City's General Plan creates an obligation requiring the City to provide housing for people employed within the unincorporated area. The City stands by its prior comment that, if the County chooses to approve new commercial development on land subject to the Airport Industrial Area Specific Plan, such action would occur despite the absence of sufficient land within the City limits, under either the existing General Plan or the proposed new General Plan, to provide housing for all persons employed in the newly developed area. The problem identified by the commentator—the prospect that approval of the AIASP amendments could create a demand for new housing – is attributable to the County's proposed action in approving those amendments, and is not a consequence of the City's proposed new General Plan. Thus, if the County believes that its own action in that context will necessitate the designation of additional land in the unincorporated area for residential uses, the County itself should directly address that issue. The City is not responsible for coming up with the solution. The City has no authority to identify areas within the unincorporated area that the County should designate for future residential uses. Nor can the City in any way be said to have "caused" the problem identified by the County.

54.10E Commentator claims there is a lack of alternatives included in the Revised DEIR, particularly the consideration of alternatives that do not alter the RUL or consider the de-annexation of the Stanly Ranch.

Response: *See 12/8/97 Response to Comments, Responses 13.10.* This comment is essentially a repetition of a comment previously submitted by the County Counsel. Regarding the reference to the City's 13.10 response in the last half of this comment, the City does not consider the "Study Area" designation for Stanly Ranch as substantively the same as de-annexation. Further, there is no requirement that the City consider a de-annexation scenario for any part of its jurisdiction as one of the alternatives in the General Plan EIR.

The Revised EIR fully satisfies CEQA requirements because it contains "a reasonable range of alternatives to the project." (Citizens of Goleta Valley v. Board of Supervisors ("Goleta II") 52 Cal.3d 533, 566 [276 Cal. Rptr. 410].) CEQA does not require analysis of every imaginable alternative but that governmental agencies consider reasonable alternatives. Although an EIR could include more alternatives than those identified by the lead agency "CEQA establishes no categorical legal imperative as to the scope of alternatives to be analyzed in an EIR. Each case must be evaluated on its own facts, which in turn must be reviewed in light of the statutory purpose. "(Goleta II, supra, 52 Cal. 3d at 566.)

It should be noted that under the scenario described in "Reduced Growth Alternative 1: No Growth", on page 5-10 of the RDEIR, development at the Stanly Ranch would not occur and the land would remain vacant, although not de-annexed.

54.11E Commentator believes that the General Plan Revised DEIR should analyze the particular impacts of the Stanly Ranch development.

Response: *See 12/8/97 Response to Comments pages 3-5, Standard Response CEQA Application to General Plans; pages 9-13, Standard Response Stanly Ranch; Responses to Comments 12.3, 13.7, 13.14, 13.20, 27.3, 27.5, 27.7, 27.57, 37.7, 41.2, B.1 and C.1. Also see Response to Comments 46.1, 46.2, 47.1, 48.3, 48.4, 54.4, 54.7, 54.8 and 54.10 in this response document.*

54.12E Commentator expands on comment 54.2 regarding the adequacy of the description of the project and regional setting with references to particular sections of the draft General Plan documents and questions the adequacy of the 12/8/97 response given to the same comment.

Response: *See 12/8/97 Response to Comments, Responses 13.2 and 13.11. Also see Response to Comments 54.2, 54.3, and 54.9 in this response document.*

As stated in Response to Comment 13.11, the City disagrees with the commentator's assertion. Together, the Revised Draft EIR, the Draft Policy Document, and the Draft Background Report contain extensive and detailed information on the regional setting. The key sections are identified in Table 1-1 on page 1-5 of the RDEIR which provides a crosswalk showing how General Plan documentation satisfies EIR requirements. The following summarizes where information on the regional setting can be found in each of the three documents.

Revised Draft EIR

Project Location (pg. S-1): Describes the geographic location of the City relative to the region and the regional access connections

Crosswalk Table 1-1 (pg. 1-5): Links the discussion in the draft Policy Document and Background Report to the RDEIR

Project Location (pg. 2-1): Describes the geographic location of the City relative to the region and the regional access connections

Project Area (pg. 2-1): Describes the City's physical size, and the various jurisdictional and policy boundaries and the area subject to planning and CEQA analysis in the Draft General Plan

Regional Location Figure 2-1 (pg. 2-2): Graphic showing the location of the City of Napa relative to the Bay

Area and Sacramento regions

Project Area and RUL Figure 2-2 (pg. 2-3): Graphic showing the configuration of the City and the distribution of parcels outside and within its policy and jurisdictional boundaries

Environmental Chapters 3-1 through 3-12: Describes the environmental characteristics of various features within the City under the analysis topics of the EIR.

Draft Policy Document

Regional Setting (pg. 2): Describes the geographic location of the City relative to the region and the regional access connections

History of Land Use Planning in Napa (pg. 2 to 7): Describes the 150 year history of city development including discussion of city and regional conditions and the physical changes that resulted from historic economic and legislative influences

Napa General Plan Context (pg. 8 to 11): Describes the current local and regional conditions (regulatory, physical, economic, social etc.) under which the draft plan has been prepared.

Environmental Constraints (pg. 11 to 12): Describes the physical limitations presented by specific features within the City's planning area

Draft Background Report

Regional and Local Setting (pg. 1-1 to 1-3): Describes the geographic location and size of the City related to both the regional and the local setting, providing details on the location and nature of the City Limits, SOI, RUL and the planning areas of the City.

History of Land Use Planning in Napa (pg. 1-5 to 1-11): Describes the 150 year history of city development including detailed discussion of city and regional conditions and the physical changes that resulted from historic economic and legislative influences

Existing Land Use Summary (pg. 1-12 to1-19): Describes the current acreage of land use designations, the location and general character of existing residential, commercial, industrial development and the location and character of parks, vacant and underutilized land. Table LU-2 provides detailed acreage quantities by Planning Area and Figure LU-5 shows developed and undeveloped land.

Visual Setting (pg. 1-20 to1-26): Describes in detail the visual quality of the Napa region, identifies gateways, scenic corridors and significant views. Includes discussion of how land forms and natural resources shape the setting for the City. Provides details discussion of the visual character of the built environment. Figure LU-8 maps the visual character of all residential uses in the City.

Regional Regulatory Setting (1-27 to 1-30) Describes other plans, entities and regulations affecting Napa

Population and Employment (1-30 to1-40) Provides detailed discussion of population and employment trends in the City, County and Region. Tables and Figures demonstrate statistical data from as early as 1940 to the year 2020.

There are 8 Chapters in the Background Report on the topics of Housing, Transportation, Community Services, Parks, Historic Preservation, Natural Resources and Safety. Each of these chapters provides information on the regional setting relative to the topical issues (e.g. "Regional Context", Chapter 3 Transportation, pg. 3-1)

54.13E Commentator expands on comment 54.3 regarding the analysis of regional effects, providing details on several environmental topics and references for clarification.

Response: *See 12/8/97 Response to Comments, Standard Responses Stanly Ranch, Big Ranch Specific Plan and Transportation; Responses 8.1 (analysis of traffic impacts outside of city), 13.4 & 13.5 (extent of traffic analysis and impact significance); 13.12 & 13.13 (prior responses to these same comments).* . The commentator has essentially repeated the same concerns included in the referenced comments and has included opinions on the adequacy of the City's response to these previous comments. The City believes that the additional detail provided in the 12/8/97 Response to Comments, along with the modifications made in the Revised Draft EIR, adequately address the concerns raised by this comment.

It should be noted that in 1989 the City of Napa approved Resolution 89-362 which established a Street Improvement Fee for all new development within the City of Napa. The list of projects includes local and regional improvements. In an effort to clarify the current participation in funding the fair share of costs of road improvements occurring outside the City (implied by policy T-1.2 on pg. 3-9 of the Policy Document), an addendum to the Policy Document will be prepared to add the following implementation programs that clarify how Policy T-1.2 will be carried out. The implementation programs will be inserted after program T-1.C on page 3-11 and will read:

> T-1.D. The City shall continue to implement Resolution 89-362, which establishes a Street Improvement Fee for all new development within the City of Napa, to mitigate local and regional impacts. The City shall conduct a review to update and refine Resolution 89-362 as needed, to reflect current conditions and needs.
>
> T-1-E. The City shall continue to participate as a cooperative member of the Congestion management Agency, or its successor, to coordinate local and regional transportation needs.

(Existing implementation programs following this insertion will be renumbered accordingly)

54.14E Commentator expands on comment 54.6 regarding analysis of sewage capacity and questions whether the proposed "will serve letter" policy is a satisfactory mitigation.

Response: *See 12/8/97 Response to Comments pages 3 & 4, Standard Response CEQA Application to General Plans and pages16 &17, Standard Response Wastewater as well as Responses 13.14, 13.15 and 13.16. Also see Response to Comment 54.6 in this response document.* This comment is essentially a repetition of the comment previously submitted by the County Counsel with an added question regarding the adequacy of the City's proposed "will serve" letter requirement as a mitigation in the Revised Draft EIR.

CEQA recognizes that environmental analysis needs to be appropriate for the level of policy or type of project being considered. Section 15146 of the State CEQA Guidelines states that the degree of specificity required in an EIR needs to correspond with the degree of specificity involved in the underlying activity which is described in the EIR. A General Plan EIR is considered a "program EIR" due to the hierarchical nature of planning and project decision making and because the specific effects of future projects cannot be predicted with sufficient accuracy to avoid a speculative conclusions. As described in Response to Comment54.6, the level of detailed information and analysis required for a Waste Water Treatment Plant project is not available. The City cannot predict now, with any degree of certainty, what physical and regulatory circumstances would be involved in such an analysis. Such an exercise would not only be infeasible, but would constitute speculation at this time. The City has determined that the addition of the "will-serve letter" as policy is a feasible method for addressing the issue of plant capacity and allows

the Napa Sanitation District to pursue project implementation to respond to the city's waste water demand according to their legal obligation.

It is interesting to note that the Draft EIR for the County's Airport Industrial Area Specific Plan (August 12, 1996) recognizes this impact and concludes that a very similar form of mitigation will result in a less than significant impact on wastewater capacity. The County's capacity related mitigations (page III-E-4 of the AIASP DEIR) read:

> *"Prior to permit approval, the NSD should review all new large development proposals to determine their ability to service the site. In addition, once the ACCWD transfers its flows from the SNSD to the City of Vallejo the NSD will have more treatment capacity to accommodate new development. ... Develop policies within the Specific Plan Update to make future development contingent on adequate sewer service capacity."*

54.15E Commentator expands on comment 54.7 and claims that the Revised DEIR lacks meaningful discussion of the cumulative impacts of future projects in the City such as Stanly Ranch and Big Ranch Road and, in addition, does not recognize the County's Airport Specific Plan amendments in its analysis.

Response: *See 12/8/97 Response to Comments, Responses 13.6 and 13.17. Also see Response to Comment 54.7 in this response document.* This comment is essentially a repetition of a comment previously submitted by the County Counsel. Cumulative impacts are discussed on page 4-2 through 4-8 of the Revised DEIR. The Revised DEIR includes changes to the impact conclusion regarding transportation and recognizes that the intersection of SR 221 - SR 29 will continue to operate at LOS F as a cumulative condition. The cumulative analysis of this impact is presented in the 12/8/97 Response to Comment 8.1 and included in the RDEIR on 3.3-8 through 3.3-11.

54.16E Commentator expands on comment 54.8 by repeating the argument related to growth inducement as presented in the 12/8/97 Response to Comments, Comment 13.20 and implies that City should have made changes in Revised DEIR with regard to growth inducement.

Response: Based on the information presented in the 12/8/97 Response to Comments, Response 13.20 (same comment previously submitted by County Counsel), and Standard Responses RUL and Stanly Ranch, the City believes that the current documentation adequately analyzes growth inducement and that changes to the discussion and conclusions in the environmental document for the Draft General Plan are not necessary. The commentator has cited no evidence that development in the two planning areas will necessarily lead to "intense pressure" for urbanizing adjacent areas. As stated in previous responses, the strong political will of both the City and County to maintain the RUL has been successful in limiting growth pressures over the last twenty years. Any attempt to amend the RUL in the future will require legislative action and will be subject to discretionary review and CEQA compliance.

54.17E Commentator repeats the claim presented on the DEIR, that the Draft General Plan conflicts with the County General Plan and that the Revised DEIR fails to analyze the impacts.

Response: *See 12/8/97 Response to Comments, Responses 13.8, 13.9, 13.21 and 13.22. Also see Response to Comment 54.8 & 54.9 in this response document.* This comment is essentially a repetition of a comment previously submitted by the County Counsel. With regard to the impact of future development on agricultural land, see the 12/8/97 Standard Response RUL and pages 3.2- through 3.2-7 of the Revised DEIR wherein the environmental conclusion has been revised to "significant".

It should be noted that the Resources Agency amended Appendix G to the CEQA Guidelines in May 1997 with respect to determining significant effects. The phrase "will normally have a significant effect on the environment" has been replaced with "may be deemed to", clearly changing the way Appendix G characterizes thresholds of significance.

As stated in prior responses to this same question, the City does not consider the draft General Plan to be in conflict with the County General Plan. These views are supported by discussion in the above referenced Responses and in the portion of the "Standard Response RUL" entitled, "Consistency with County General Plan (12/8/97 Response to Comments). Regardless, even if there were a conflict, the City does not accept the notion that an inconsistency between community goals rises to the level of an environmental impact.

54.18E Commentator repeats the claim that traffic is not properly analyzed and therefore air quality issues are not clear and cannot be commented upon.

Response: *See 12/8/97 Response to Comments, Responses 13.23.* This comment is essentially a repetition of the comment previously submitted by the County Counsel. The City maintains that the prior response to 13.23 adequately addresses this comment.

54.19E Commentator refers to previous statements in comment 54.10 related to the inclusion of agriculturally designated land in the RUL and the suggested de-annexation of the Stanly Ranch and expands the discussion.

Response: *See Response to Comment 54.10.* As evidenced by the background facts on Stanly Ranch reported on page 9 of the 12/8/97 Response to Comments, Stanly Ranch was incorporated territory within the City limits prior to the establishment of LAFCO. Further, in 1970, LAFCO did include Stanly Ranch in the City's SOI and then, by its own action in 1972, LAFCO excluded Stanly Ranch from the City's SOI, even though it remained as incorporated territory. Stanly Ranch has continued to be an incorporated part of the City since 1955; the anomaly regarding the SOI is a result of LAFCO decisions and not the result of policy changes by the City.

The implication that the City's General Plan EIR must be adequate to evaluate LAFCO future actions is misleading. The City's EIR is intended to evaluate the environmental impacts of the City's General Plan. A future LAFCO action may or may not be able to depend on the analysis of the City's General Plan EIR. LAFCO certainly has the ability to prevent development of certain areas shown in the General Plan; and, the City does not intend for this EIR to suffice as a complete environmental analysis for any specific future proposals that require EIRs and are subject to LAFCO approval. In such cases, the project EIR will need to include analysis for the LAFCO action. The list of "responsible agencies" in the General Plan RDEIR (pgs. 1-6 to 1-7) could be misleading in that there are no true "responsible agencies" for the General Plan; although, there are, of course, many agencies very interested in the General Plan. This understanding of the term "responsible agency" is clarified here to effectively eliminate the interpretation that there are responsible agencies that will be required to use the EIR for this General Plan for their future actions. In the case of Stanly Ranch, the General Plan EIR is not intended to suffice for any LAFCO action for that project. The EIR prepared for the Stanly Ranch Specific Plan will include more specific analysis of the issues related to any LAFCO decision on the Stanly Ranch property.

54.20E Commentator repeats previous statements related to analysis of the Stanly Ranch development and inconsistencies between the County General Plan and the draft City General Plan and claims that the Revised DEIR is inadequate as a result.

Response: *See 12/8/97 Response to Comments, Standard Response CEQA Application to General Plans and Responses 13.8, 13.9, 13.2, 13.22 & 13.24. Also see Response to Comment 54.8 & 54.9 in this response document.* This comment is essentially a repetition of comments previously submitted by the County Counsel.

55. Napa County Conservation, Development & Planning Department January 21, 1998

55.1G Commentator expresses concern with the City's proposed expansion of the RUL in two areas; questions the adequacy of the City's 12/8/97 response to the same comment; and clarifies the County's position with regard to the State Hospital, which is currently designated "urban" by the County, stating that it should be maintained in the County's jurisdiction to provide land for future housing for jobs created at the Airport. Request that City revise Draft General Plan to exclude the adjustment of the RUL around the State Hospital.

Response: *See 12/8/97 Response to Comments, Responses 12.1, 12.2, and Standard Response RUL; also see Responses 54.9 and 54.17 in this response document.* The City's Draft General Plan proposes a "Public Serving" land use designation for the State Hospital property, assuming continuation of the institutional use of the land. The Draft General Plan does not contemplate any new development, residential or otherwise, on the property. The City has not represented that the State Hospital has agricultural potential, but that it is Urban, partially served or supplemented by City services and already within the LAFCO adopted Sphere of Influence.

55.2E Commentator clarifies the County's position with regard to the 40 acres of land at the northeast corner of Big Ranch Road and Trancas Street (proposed to be included in the RUL) by stating that Class I soils are not an adequate measure of agricultural significance for vineyard cultivation and that, regardless of the soil classification, the land is designated Agricultural Preserve by the County. Request that City revise Draft General Plan to exclude the proposed adjustment of the RUL around this 40 acre area.

Response: The issue of whether the City is contemplating development on soils with potential agricultural merit (such as the RUL adjustment area at the northeast corner of Big Ranch / Trancas) is one that has been raised by the County as documented in the 12/8/97 Response to Comments (See comment letters 12 and 13 and Standard Response RUL) and was subsequently addressed in the Revised DEIR (RDEIR pgs. S-4, 3.2-5 through 3.2-7). The environmental conclusion in the RDEIR has been revised to disclose this impact as "significant".

An EIR for the discretionary actions necessary to develop the area at issue will be prepared before LAFCO can approve or deny any proposed annexation. The CEQA document for such an action will address in detail questions regarding the quality of the soils at issue, their suitability for grape production, and compliance with LAFCO policy.

55.3G Commentator expresses appreciation of the policy for carrying forward the Greenbelt designation and urges the City to include policies to establish a funding mechanism to work with the County and City of American Canyon to establish permanent community separators.

Response: The Draft Policy Document contains policies that would enable the City to pursue a cooperative efforts with other jurisdictions to establish permanent community separators (See Land Use Element Policies LU-1.9, LU-1.10, LU-2.1, LU-2.2, PR-3.7 and PR-3.A)

55.4E Commentator refers to the 12/8/97 Response to Comments and Addenda #7, questions the proposed mitigation policy of having the Napa Sanitation District provide a "will-serve letter" and concludes that the Final EIR must claim a significant impact with adoption of overriding considerations upon approval of the General Plan.

Response: *See Response to Comment 54.6 and 54.14 in this document.*

55.5G Commentator refers to the 12/8/97 Response to Comments page 43 and urges that the City General Plan include a commitment to adopt a traffic mitigation program to fund improvements within the unincorporated areas that are affected by travelers bound for destinations within the city limits.

Response: *See 12/8/97 Response to Comments, Responses 8.1 and 12.4 and Response to Comment 54.13 in this document.* As evidenced by the referenced response, this comment was not "dismissed out of hand" but includes a status report on the current conditions of countywide transportation facilities and mitigation opportunities. The Revised DEIR includes modifications that add clarification to the traffic conditions outside of the city limits and the impact conclusion regarding the intersection of SR 221/SR29 and the uncertainty of funding for transportation improvements has been revised to "significant" (RDEIR Pg. 3.3-8). As stated in Response 12.4, this is not strictly a city issue, but involves several jurisdictions. The proper approach would be a joint effort by all parties to provide funding to respond to impacts in the County. The City participates in the CMA (the only mechanism for cooperation currently available) and the Draft General Plan includes policies to support continued participation in cooperative opportunities for funding the City's fair share of mitigations to roadway impacts in the County (Policies LU-1.9, T-1.6, T-1.7). Specific recommendations for additional policy language can be proposed by the commentator for consideration by the City Council during hearings on the General Plan.

55.6G Commentator urges the City to include a commitment to adopt a housing in-lieu fee program as suggested in the 12/8/97 Response to Comment document, comment 12.6G , page 44.

Response: *See 12/8/97 Response to Comments, Response 12.6.* The Draft Policy Document includes policies LU-1.9 and LU-1.10 which address the need for cooperation and coordination with surrounding jurisdictions to achieve common interests and identify revenue-sharing opportunities.

Responses to Comments Received After January 21, 1998 But Prior to Notification from OPR

56. Michael Fennel for Duden Family Trust Received January 23, 1998

56.1G **Commentator is representing owners of parcels in the City (APN 46-450-32 & 33) and wishes to clarify his understanding that the RDEIR 45 day review deadline of January 21, 1998 is comments related to comments on environmental issues and that comments on proposed land use designations may be submitted as the Plan proceeds through the review process.**

Response: Comment noted. The commentator has been added to the notice list for the General Plan.

57. Robert M. Rugg Received January 26, 1998

57.1G **Commentator observes that the Revised DEIR and Addendum # 3 do not accurately reflect the street connections approved with Big Ranch Specific Plan relative to Sierra Avenue.**

Response: *Refer to response to comment 50.8G.*

58. Governor's Office of Planning and Research Received January 26, 1998

58.1 **OPR verification of document circulation and close of 45 day required comment period noting that none of the State Agencies have provided comments through the State Clearinghouse.**

Response: Comment noted and letter filed for the record.

APPENDIX A

COMMENT LETTERS 43 THROUGH 58

APPENDIX E

DP&F
DICKENSON, PEATMAN & FOGARTY
A Professional Law Corporation

GENERAL PLAN COMMUNICATION #43

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Tel: 707 252 7122
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Joseph G. Peatman
Walter J. Fogarty, Jr.
David W. Meyers
C. Richard Lemon
Francis J. Collin, Jr.
David B. Gilbreth
Charles H. Dickenson
Paul G. Carey
Richard P. Mendelson
Joseph M. Keebler
Cathy A. Roche
Jonathan P. Dyer
James W. Terry
Katherine Ohlandt
Stan D. Blyth
Linda Emerson
Thomas F. Carey

Howard G. Dickenson,
Retired

January 20, 1998



John Yost, Planning Director
City of Napa Planning Department
1600 First Street
Napa, CA 94559

RE: Comments on Draft City of Napa General Plan and Revised Draft EIR

Dear Mr. Yost:

We are writing on behalf of a number of citizens who own property in Congress Valley and/or the City of Napa to comment on the Draft General Plan and related EIR. Our primary concern relates to the proposed land use designation for the ridgeline area located east of Highway 29 and immediately south of Old Sonoma Road (Westwood Planning Area #7; APNs 43-040-08, 10, 13 and 25). This visually prominent area has been designated SFR-123 (Single Family Residential) in the Draft General Plan.

The SFR-123 designation would allow the area in question to be carved up into 1/2 acre residential lots, thereby creating significant visual and aesthetic impacts to adjacent areas, as well as to everyone who lives on the valley floor. Such hilltop development would also result in extensive site grading and tree loss. Finally, the proposed residential densities would be incompatible with the existing agricultural uses to the south and west. 43.1 G

This highly visible and environmentally sensitive area has already been the subject of a number of development proposals. Each time, the public has expressed strong opposition to those proposals based on aesthetic, visual, biological, geological, agricultural and other impacts associated with development in this area. The proposed General Plan designation of SFR-123 would continue to make

the area available for development at densities which clearly are unacceptable to the public and which also are unacceptable from an environmental standpoint.

43.1 G

We therefore respectfully request that the Draft General Plan be revised so as to redesignate the lands in question to a residential density of no more than one unit per 20 acres. This designation would protect the ridgeline and local and area-wide views. It also would protect existing agricultural uses from incompatible adjacent uses. Finally, it would eliminate, once and for all, any future possibility of urban sprawl into this highly visible area.

43.1 G

Thank you for this opportunity to comment on the Draft General Plan and EIR, which have major adverse implications for the future quality of our community.

Very truly yours,

DICKENSON, PEATMAN & FOGARTY

Joseph G. Peatman

JGP/LE:cc

le\ghisl.ltr

JUDY IRVIN, A.I.A.

ARCHITECTure
& PLANning

GENERAL PLAN COMMUNICATION #44

January 21, 1996



John Yost, Director
Planning Department
City of Napa
P.O. Box 660
Napa, CA 94559-0660

RE: Draft General Plan, Revised DEIR, Addenda and Responses to Comments

Dear Mr. Yost;

I have reviewed the Addenda to the Draft Policy Document, responses to my last comments and the revised DEIR and compared them to the documents issued in 1996. Although I recognize that the task of preparing a cohesive General Plan is difficult at best, it appears that you may have crossed the line of legal adequacy. As you are aware, the General Plan must be informational, readable and public. Now that the Plan includes three documents and the DEIR includes another three, it is virtually incomprehensible to the uninitiated private citizen. 44.1 G

Some of the comments outlined in my letter of December 2, 1996, remain unanswered and a new issue has emerged which must be factored. Last year, the Napa Abajo-Fuller Park District was included on the National Register of Historic Places. This district is bisected by Coombs Street which is planned to accommodate a very high traffic volume, 9,700 vehicles per day. The adverse impacts of traffic on historic resources has been well documented and must be evaluated in the DEIR. Therefore, DEIR finding #2 that ..."*Development accommodated by the draft General Plan would not result in impacts to historic properties within the City*" is inaccurate. 44.2 E

The street grid in the National Register District is generally made up of 60' wide roadways designed for health reasons to keep horses as far away from houses as possible. Thus, the hierarchy of street standards, from Local to Collector to Arterial, shown in the Background Documents does not apply.

. . . . . *at the*
Sawyer Tannery
8 Coombs Street, Bldg A
Napa, California 94559
707-258-2791 fax
707-224-3228

JUDY IRVIN, A.I.A.

ARCHITECTure
& PLANning



44.2 E

Numerous driveways and street parking affecting sight distances do not meet Collector standards. If the high volume through traffic on Coombs is impeded in any way, such as an accident or congestion, the traffic will reroute onto other streets in the grid spreading the adverse impacts. One of the key features of these historic neighborhoods is that they are walkable and friendly. High traffic volumes make them less livable and thus will cause disinvestment in the Old Town.

44.2 E

44.3 G

I fear that my suggestion that the City of Napa consider policies and an ordinance to transfer development rights, even non-rights, was not understood by your staff. Transfers of Development Rights (TDR's) can be very effective tools in protecting historic resources. In Traditional Neighborhoods, TDR's could be used, coupled with Specific Plans, to allow owners of historic homes converted into substandard or illegal units to sell the density over the legal allowable limit to be used on another, more appropriate site identified by the neighborhood. The use of these tools could allow historic residences to be restored to their former glory without economic hardships to the slumlord... I mean, original investor. It could also increase the balance of owner occupied dwellings in the neighborhood and provide increased densities for low income housing. In the downtown, TDR's coupled with increased FAR's can support restoration of historic properties, not encourage demolition as stated in your response. An owner of an historic property could use the value of the unused FAR toward the restoration costs in the Federal Tax incentive formulae or, as suggested above, sell those rights to another developer.

44.3 G

44.4 G

I enthusiastically support the suggestion in the Fiscal Analysis that the City of Napa focus on the fiscal value of the "Moving up Market". The New Urbanism has debunked the notion that the historic urban core is the place to dump all of the high density, low income dwellings. The health of the historic downtown depends on making the adjacent historic neighborhoods the place upscale professionals, young and old, will chose to live so that they can walk downtown to patronize shops, theaters and restaurants. Diversity...in income, age or culture... add to the excitement; but the health of historic neighborhoods depends on pride of ownership and investment. In the future, affordable housing needs to be located in close proximity to affordable shopping such as Target, K-Mart and other discount stores to reduce dependency on the private automobile. Since the cost of owning a car is a major expense, being able to walk to the grocery store pushing a baby stroller helps.

44.4 G

. . . . . *at the*
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JUDY IRVIN, A.I.A.

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I recognize that most of these concerns are small. The biggest problem with the Draft General Plan's vision is that it is not very visionary. It is a vision based on conflicting values. It sees through the developer's eye.. more money, more big growth, more single use zoning and, inevitably, more traffic congestion. It sees through the eyes of various NIMBYs who fight any increases in population, densities or diversity and ignore the very real needs of the Valley's underclass. And it sees through the eyes of government bureaucrats... more revenues and less hassles. Shouldn't we be looking at ways to make the City more livable, to foster community spirit and bridge the gaps between people? The post war planning theories upon which this Draft General Plan is based have been indited as one of the root causes of the urban fragmentation that now plagues us all. When the staid old Bank of America issued their report "Beyond Sprawl", it became very clear that the tide has turned and we must think about cities in new ways. I don't think we are there yet.

44.5 G

Sincerely,

Judy Irvin, A.I.A.

cc: Napa County Sierra Club
Dean Kackley, Napa Cultural Heritage Commission

. . . . . *at the*
Sawyer Tannery
8 Coombs Street, Bldg A
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42

GENERAL PLAN COMMUNICATION # 45

January 20, 1998

Ms. Jean Hasser
Napa Planning Department
P. O. Box 660
Napa, CA 94559-0660

Subject: General Plan Environmental Impact Report.

Dear Ms. Hasser:

45.1 E

Attached is a copy of a memorandum I sent to the Airport Land Use Commission last summer regarding what I feel are mistakes in the current Airport Land Use Compatibility Plan. Since the City is required to address environmental issues pertinent to the Airport Compatibility Planning Area, the issues raised in my letter should be included in your environmental review.

45.1 E

Thank you for the opportunity to comment on the Revised Draft Environmental Impact Report.

Sincerely,

Carl Kangas
Commissioner
Napa County Airport Land Use Commission



43

To: Napa County Airport Land Use Commission. August 12, 1997
From: Carl Kangas, Commissioner

APPENDIX E

Re: Napa Airport Land Use Compatibility Plan

Madam Chairman & Commissioners,

Since my appointment to the Napa County Airport Land Use Commission, I have been studying the current Airport Land Use Compatibility Plan (ALUCP). I have found several items in this plan that need to be changed or updated to meet the stated goal of protecting public health, safety and welfare.

Item #1: Noise Level Contours:

Figure 5c, page 5-8 does not show noise levels under the traffic pattern. (See attachment number 1). I have personal knowledge of the noise levels generated by the aircraft operated by the airline training school located at the Napa County Airport. (Also the major user of the airport.)

The single engine A-36 Bonanza has a published fly-over noise level of 76.7db(a). The twin engine turbo-prop King Air C-90 has a published fly-over noise level of 74.3db(a). The A-36 normal pattern is 1,000 ft. above ground. The C-90 is 1,500 ft. above ground. (See attachment numbers 2 & 3). Circling type instrument approaches for either type would be 600 to 620 ft. above ground level. (See attachment number 4). ak

Item #2: Compatibility Zones, figure 3A, pages 3-17.

There are two zone D areas that are encroached on in part by zone E's, specifically the areas south of Green Island road to the south of the airport, and an area northwest of the airport, west of the Napa River. Both of these are E zones over flown by the published traffic patterns of the airline training center and other high speed aircraft such as business jets using the airport. (See attachment numbers 5 & 6)

I can see no valid reason for the incursion of those "E" zones into the traffic patterns, which should all be in D zones. For safety reasons, the entire traffic pattern should be a zone D. Allowing residential building in a traffic pattern zone is not consistent with the Airport Land Use Compatibility Plan. See page 3-12 paragraph 3.4.2. (See attachment 7)

Item #3: Noise

As stated in item #1, actual noise values of aircraft using the Napa County Airport exceed the recommended guidelines for residential land use in table 2-1, page 2-3 of the ALUCP. (See attachment number 8). It is known to me that the frequency of over-flights (ie noise events) can be as often as one per minute during peak traffic periods which are from as early as 07:00 A.M. to as late as 10:00 P.M. See noise impacts, page 2-1 & 2-2 of ALUCP. (See attachment number 9)

Residents along Milton road have made numerous noise complaints in the past. To allow more residential building in the same traffic pattern would not be wise land use and could only invite more noise complaints, despite avigation easements and disclosures.

Item #4: Open Space

There are several references to the need for open space for emergency landings in the ALUCP. Page 2-6 states that an area as small as 75ft. x 300ft. can be adequate for a survivable emergency landing. This may have been true at one time for much lighter and slower airplanes than we now operate. This size is nowhere near adequate for the higher performance single engine airplanes operating at the Napa County Airport today.

The minimum approach speed for landing without power as published in the Beechcraft A-36 Bonanza pilots operating handbook is 85 knots (equal to 97 miles per hour) (See attachment number 10). Approximately 300ft. is needed just for the flare. (the transition from the necessarily steep approach angle to the touchdown attitude.) The descent rate with no power for this airplane is approximately 1,000 ft. per minute until approximately 15 feet above the ground. This means that the pilot has one minute, or less, from engine failure at traffic pattern altitude to ground contact.

Based on landing distance charts, (See attachment number 11), I recommend a minimum of 1,500ft. (2,000 ft. would be better) x 75ft, for open space areas, spaced approximately one half mile apart through out the traffic pattern area. We cannot rely on the premise that an airplane can turn toward the airport and land somewhere on a runway. Many high performance single engine airplanes can not glide to the runway from most of the traffic pattern.

Since preserving some open space in appropriate areas around an airport is the only absolute way to ensure the safety of an airplane's pilots and occupants, I request the Airport Land Use Compatibility Plan be revised to include the Required Open Land column and paragraph 3 that were deleted from the final ALUCP. See table 2, page 18 of the Draft ALUCP. (See attachment number 12) Revise revision exhibit B of the final plan to restore these open space requirements to the plan.

Urgency Requested:
In view of the pending updates to the Napa City General Plan and the Napa County Industrial Park Specific Plan, I request that these changes be put on the agenda for the next available Airport Land Use Commission meeting for consideration and adoption as soon as possible.

It is the responsibility of the Napa County Airport Land Use Commission to provide accurate factual data for the purpose of land use planning by the statuary authority of California Public Utilities code section 21670 et seq. If incorrect information is used as the basis for land use planning within the area of jurisdiction, Napa County may assume an unacceptable liability risk. Therefore, your consideration of these changes will be gratefully appreciated.

I have included a copy of my Airman Certificates should anyone question my professional expertise. (See attachment number 13).

Carl Kangas,
Airport Land Use Commissioner

Attachment Number 1

APPENDIX E

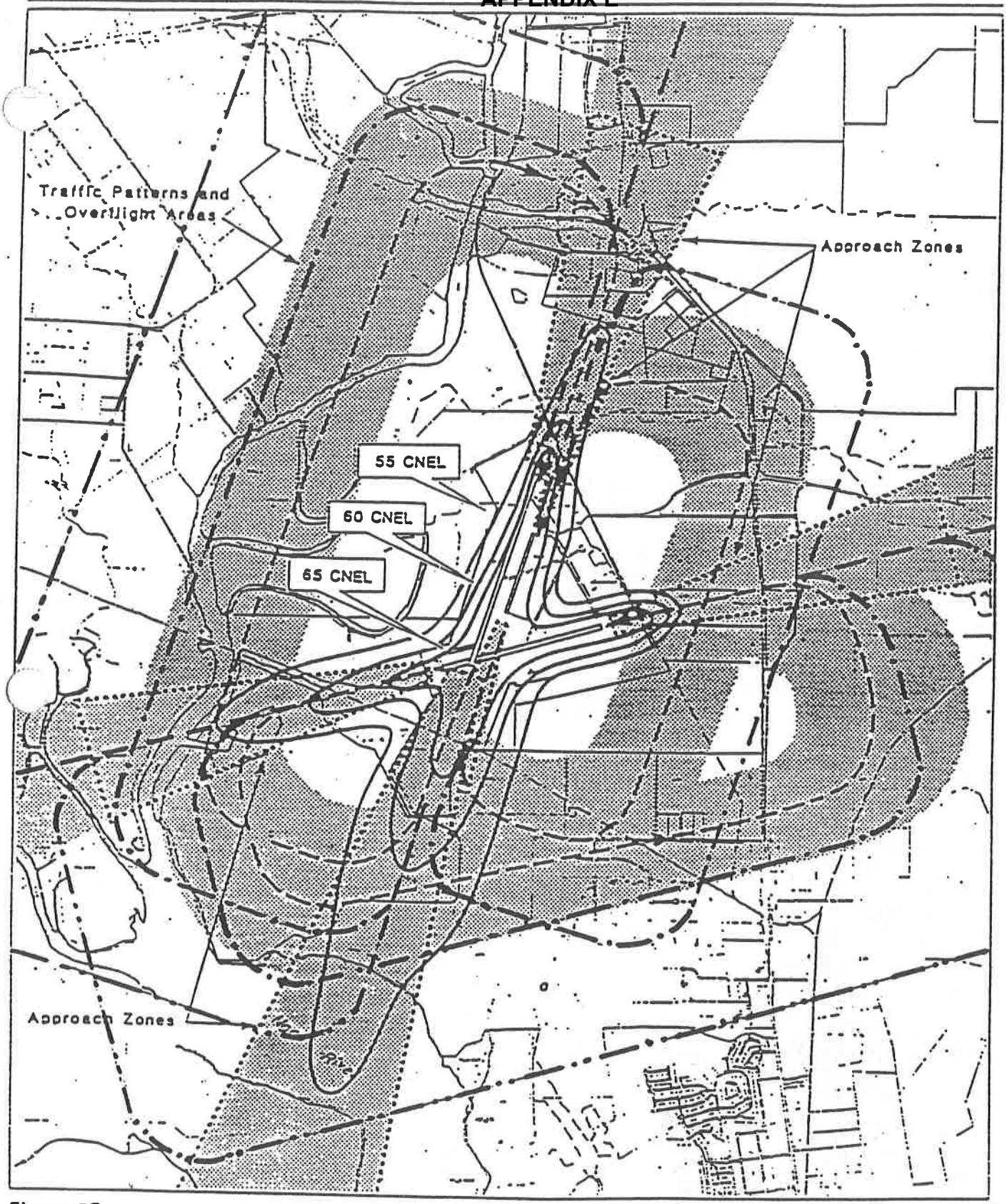


Figure 5C

Airport Impact Areas
Napa County Airport

C-90 (Turbine) Pattern 1500 ft. AGL. —..—..—
74.3 dB(A)

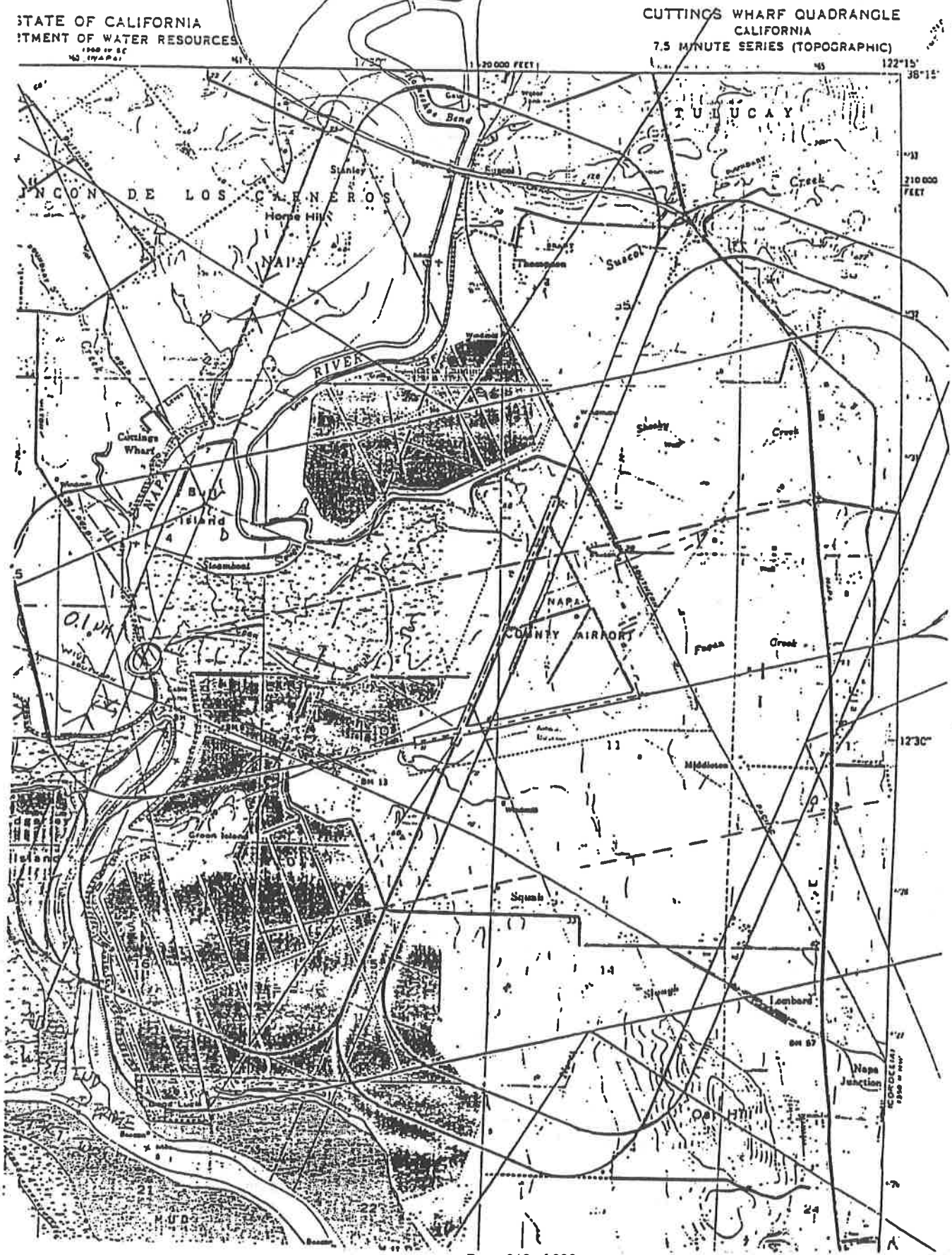
A-36 BONANZA PATTERN 1000 ft AGL —.—.—
76.7 dB(A)

46

Attachment 1a

APPENDIX E

STANLEY RANCH PROJECT



NOISE CHARACTERISTICS

Approach to and departure from an airport should be made so as to avoid prolonged flight at low altitude near noise-sensitive areas. Avoidance of noise-sensitive areas, if practical, is preferable to overflight at relatively low altitudes.

For VFR operations over outdoor assemblies of persons, recreational and park areas, and other noise-sensitive areas, pilots should make every effort to fly not less than 2000 feet above the surface, weather permitting, even though flight at a lower level may be consistent with the provisions of government regulations.

NOTE

The preceding recommended procedures do not apply where they would conflict with Air Traffic Control clearances or instructions, or where, in the pilot's judgement, an altitude of less than 2000 feet is necessary to adequately exercise his duty to see and avoid other airplanes.

Flyover noise level established in compliance with FAR 36 is:

76.7 dB(A)

No determination has been made by the Federal Aviation Administration that the noise level of this airplane is or should be acceptable or unacceptable for operation at, into, or out of any airport.

4. Extension Lever - PUMP up and down until the green gear down annunciators illuminate and further resistance is felt.
5. Extension Lever - SECURE in clip, STOWED POSITION

NOTE

Ensure the Extension Lever is in the full down position prior to placing the Extension Lever in the securing clip.

LANDING GEAR RETRACTION AFTER PRACTICE MANUAL EXTENSION

After a practice manual extension of the landing gear, the gear may be retracted as follows:

1. Extension Lever - STOW (Flush Against Floor Under Securing Clip)
2. Landing Gear Relay Circuit Breaker (pilot's subpanel) - PUSH IN
3. Landing Gear - UP

NOISE CHARACTERISTICS

Approach to and departure from an airport should be made so as to avoid prolonged flight at low altitude near noise-sensitive areas. Avoidance of noise-sensitive areas, if practical, is preferable to overflight at relatively low altitudes.

For VFR operations over outdoor assemblies of persons, recreational and park areas, and other noise-sensitive areas, pilots should make every effort to fly not less than 2000 feet above the surface, weather permitting, even though flight at a lower level may be consistent with the provisions of government regulations.

NOTE

The preceding recommended procedures do not apply where they would conflict with Air Traffic Control clearances or instructions, or where, in the pilot's judgement, an altitude of less than 2000 feet is necessary to adequately exercise his duty to see and avoid other airplanes.

Flyover noise level established in compliance with FAR 36 is: 74.3 dB(A)

No determination has been made by the Federal Aviation Administration that the noise level of this airplane is or should be acceptable or unacceptable for operation at, into, or out of any airport.

NAPA, CALIF

NAPA CO

LOC Rwy 36L

LOC 111.3 IAPC

Apt. Elev 33'

•ATIS 1[illegible]5

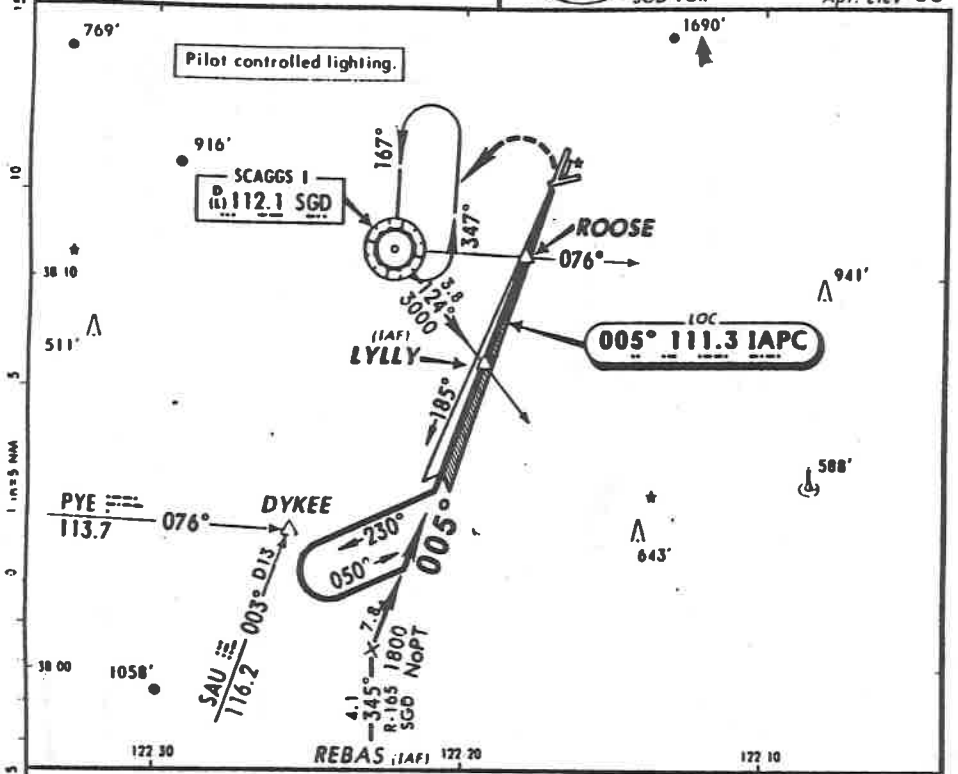
OAKLAND [illegible]er (R) 127.8

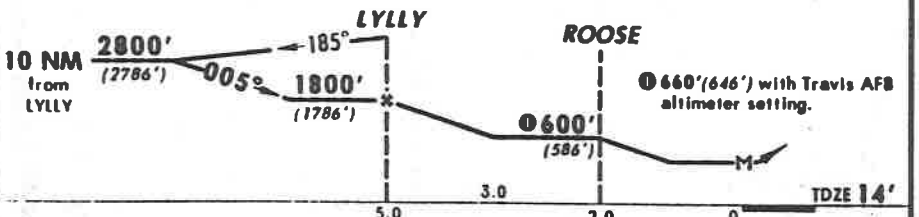
•NAPA Tower CTAF 118.7

•Ground 121.7

When Twr inop, use Travis AFB altimeter setting.

MSA SGD VOR





MISSED APPROACH: Climb to 440'then climbing LEFT turn to 3000' direct SGD VOR and hold.

STRAIGHT-IN LANDING RWY 36L	When Twr Operating		With Travis AFB Altimeter Setting		CIRCLE-TO-LAND Not Authorized Northeast of Rwys 18R & 24		
	MDA(H) 360'(346') With Roose	MDA(H) 600'(586') Without Roose	MDA(H) 420'(406') With Roose	MDA(H) 660'(646') Without Roose	Max Kts	When Twr Operating MDA(H)	With Travis AFB Altimeter Setting MDA(H)
	ALS out	ALS out	ALS out	ALS out			
A	3/4 1	3/4 1	3/4 1	3/4 1	90	600'(567')-1	660'(627')-1
B					120	620'(587')-1	680'(647')-1
C		1½		1½	140	620'(587')-1½	680'(647')-1½
D	1¼	1¾	1¼	1¾	165	1140'(1107')-3	1200'(1167')-3

Gnd speed Kts	70	90	100	120	140	160
LYLLY to MAP 5.0	4:17	3:20	3:00	2:30	2:09	1:53

VOR or GPS Rwy 6

VOR 112.1 SGD

Apt. Elev 33'

•ATIS 124.05

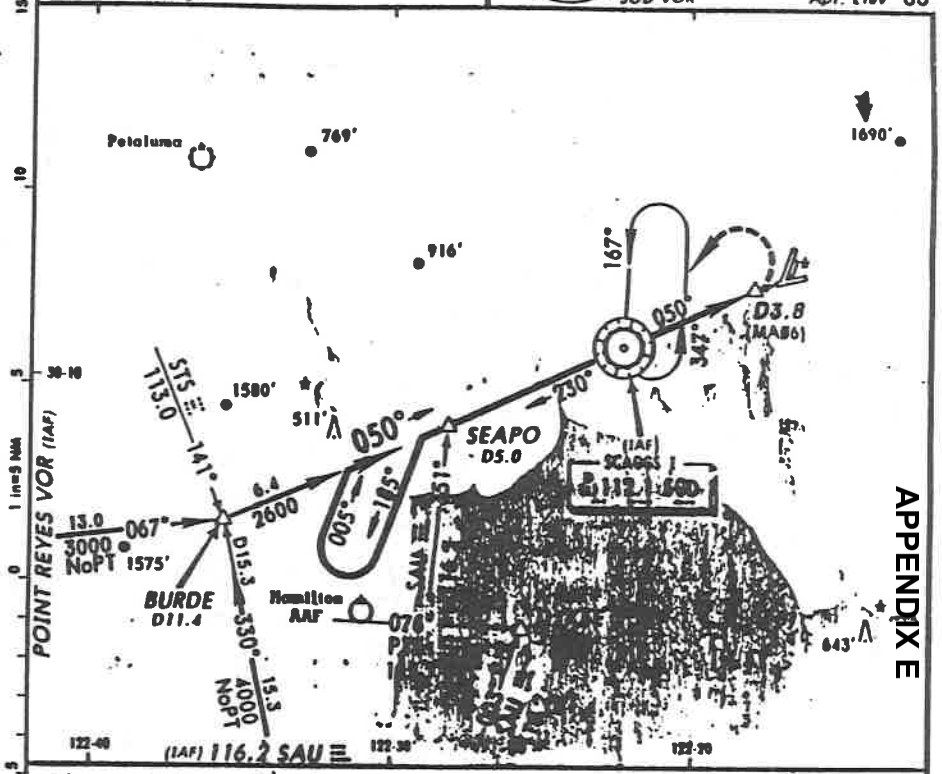
OAKLAND Center (R) 127.8

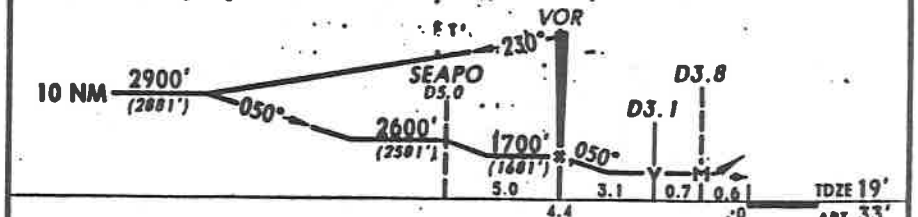
•NAPA Tower CTAF 118.7

•Ground 121.7

When Control Twr inop, use Travis AFB altimeter setting.

MSA SGD VOR





MISSED APPROACH: Climbing LEFT turn to 3000' direct SGD VOR and hold.

STRAIGHT-IN LANDING RWY 6			CIRCLE-TO-LAND Not Authorized Northeast of Rwys 18R & 24		
	MDA(H) 420'(401') Control Twr Operating	MDA(H) 480'(461') With Travis AFB Altimeter Setting	Max Kts	Control Twr Operating MDA(H)	With Travis AFB Altimeter Setting MDA(H)
A	1	1	90	600'(567')-1	660'(627')-1
B			120	620'(587')-1	680'(647')-1
C	1¼	1¼	140	620'(587')-1½	680'(647')-1½
D			165	1140'(1107')-3	1200'(1167')-3

Gnd speed-Kts	70	90	100	120	140	160
MAP at D3.8 or VOR to MAP 3.8	3:15	2:32	2:17	1:54	1:38	1:26

APPENDIX E

APPENDIX E

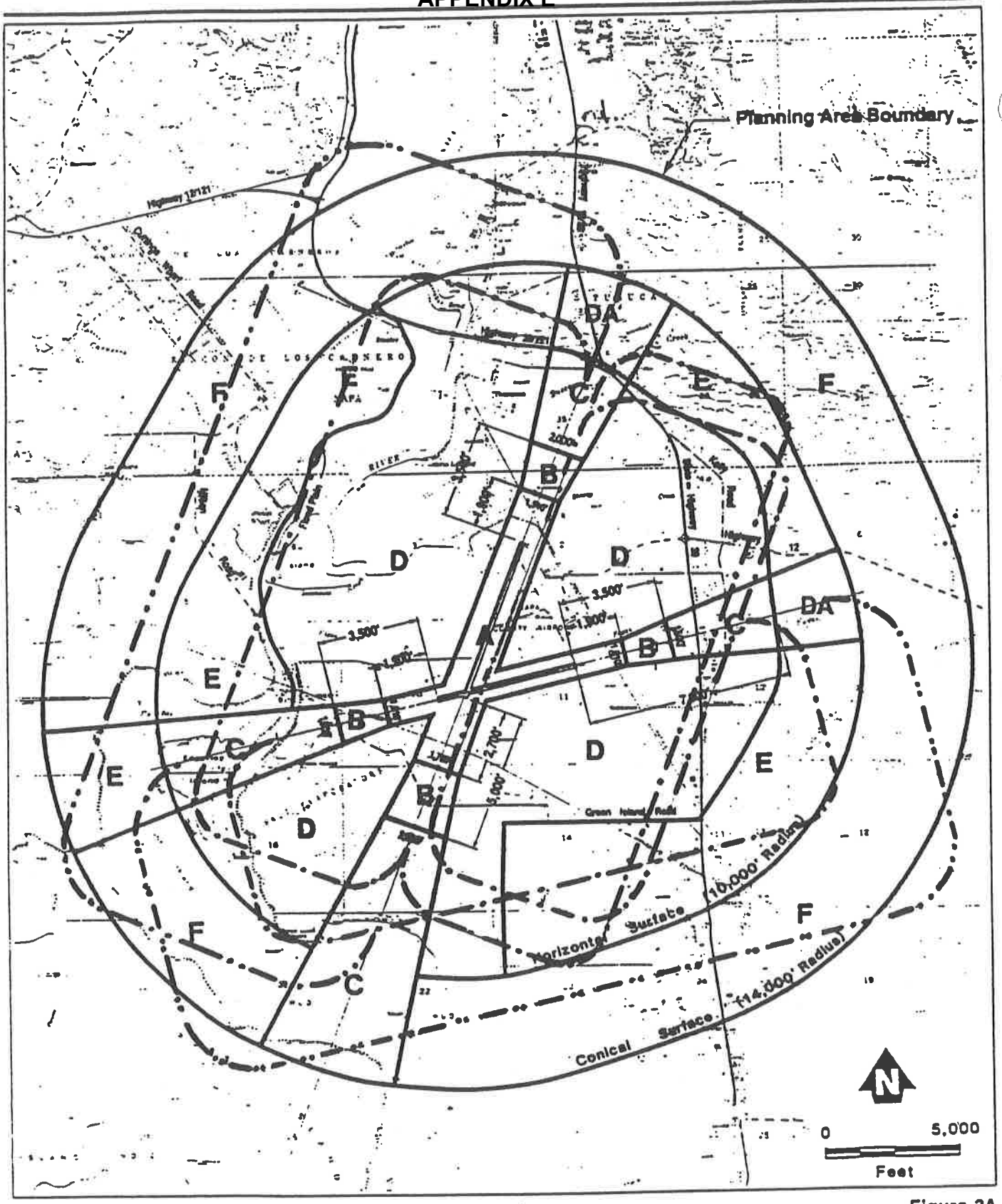
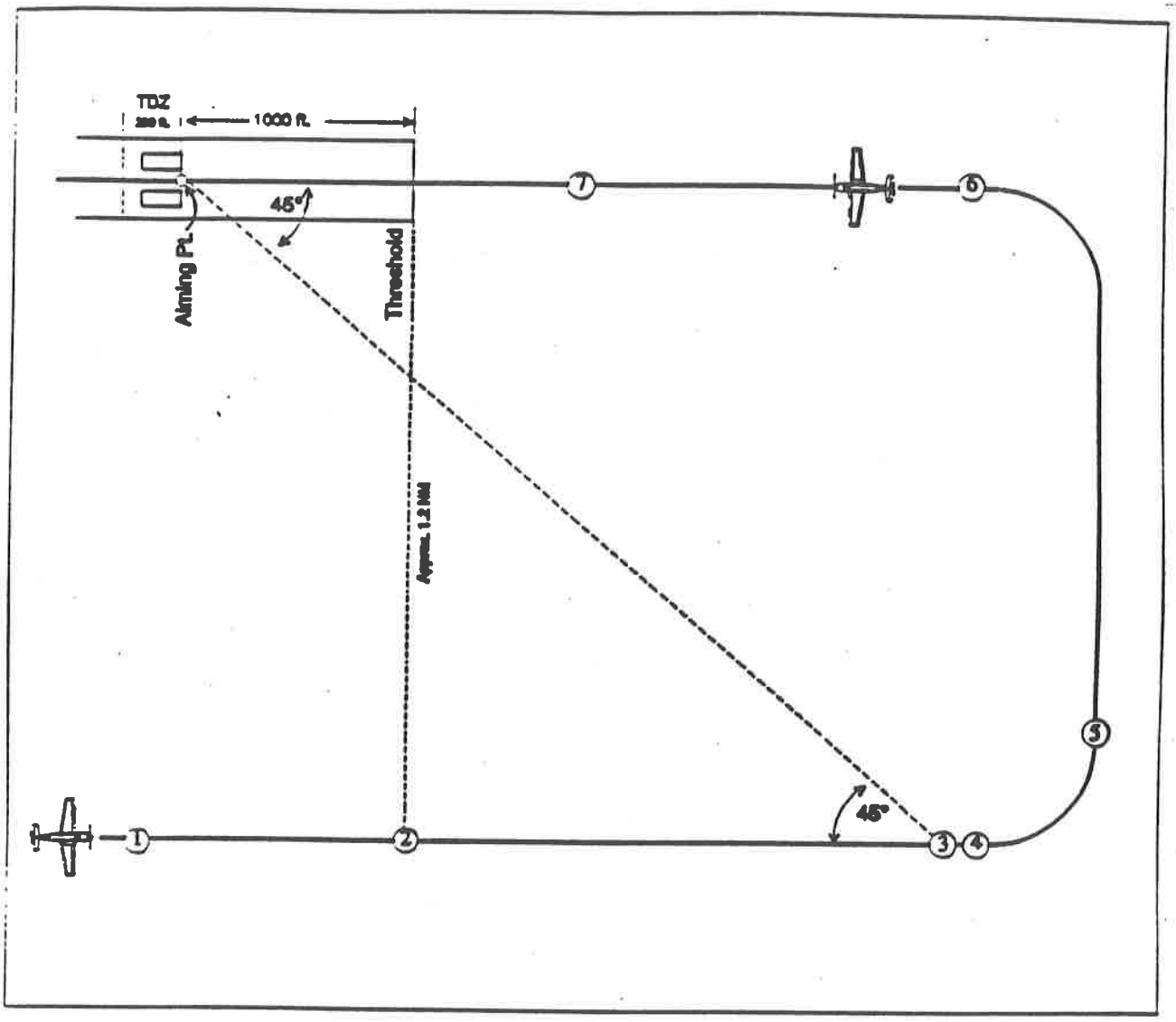


Figure 3A

C-90 KINGAIR —·—·—

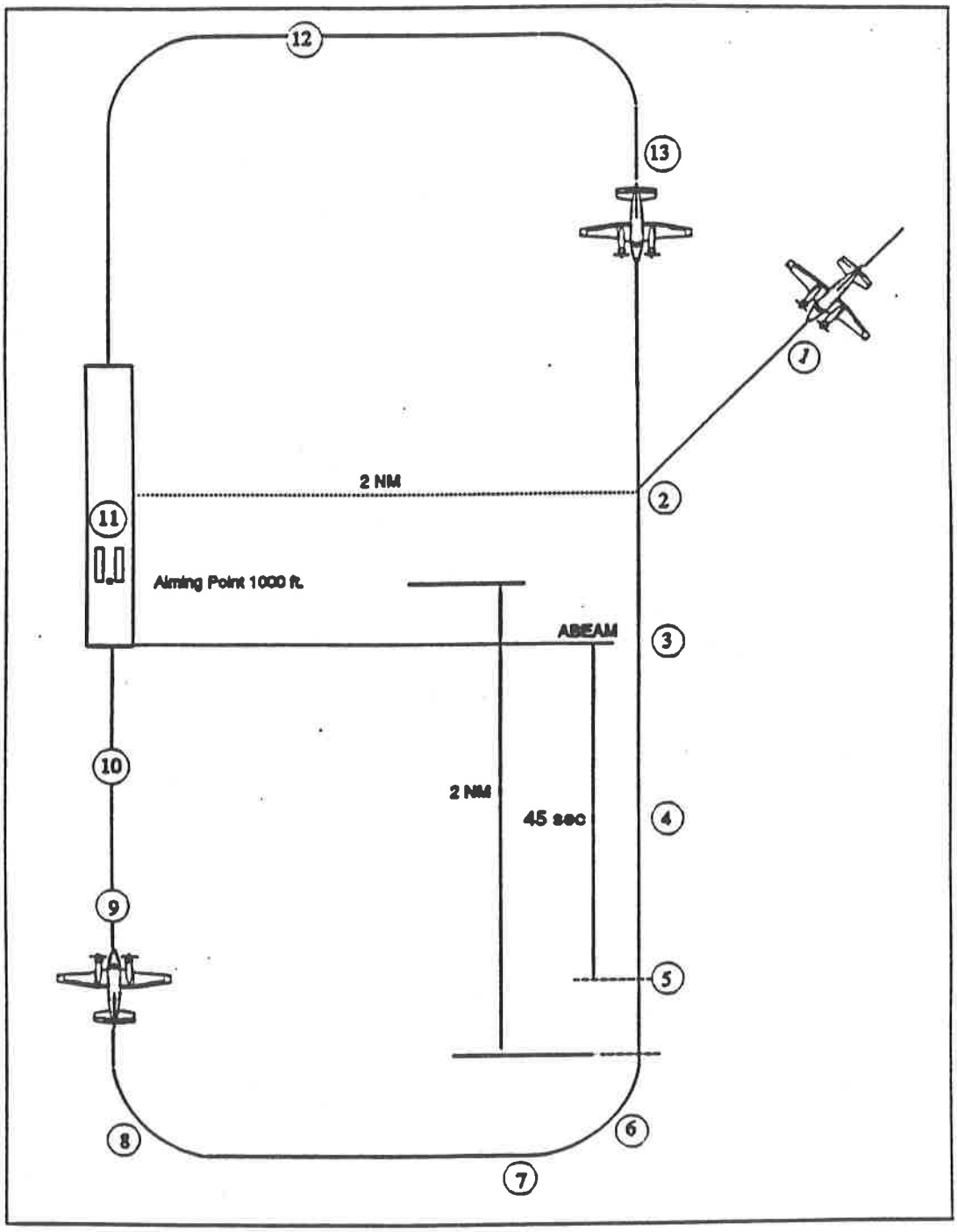
A-36 BONANZA —·—·—

C. NORMAL LANDING (Profile)



① Downwind Leg 105 kts at TPA, Flaps UP.
② Abeam threshold, Flaps 12, slow to 95 kts.
③ Gear DN.
④ Start Base Turn and begin descent, Bank 25° (maximum 30°), 95 kts.
⑤ Landing Checklist.
⑥ Flaps FULL DOWN at pilot's discretion, gradually slow to 85 kts.
⑦ SHORT FINAL procedure.

C. PROFILE: VFR PATTERN ENTRY AND CLOSED TRAFFIC



D. POINTS OF EMPHASIS

1. Planning and judgement for pattern entry.
2. Accurate traffic pattern.
3. Collision avoidance.
4. Adequate ATC communication.

3.4.2 The compatibility of uses in the airport planning areas shall be preserved to the maximum feasible extent. There is presently a high degree of land use compatibility among the existing and planned land uses in the vicinity of airports within Napa County, primarily because no residential land uses are designated within the traffic areas. The proposed conversion of land to residential use within any airport's traffic area (Compatibility Zones A, B, C, DA, and D) shall be inconsistent with this Airport Land Use Compatibility Plan, except as specifically provided herein.

3.4.3 The conversion of land **designated** for agricultural use (in respective general plans) to residential use beneath those common flight paths within Compatibility Zone E shall be discouraged. Consideration should be given to specific terrain conditions and actual flight patterns in determining the compatibility of proposed uses in these areas. Clustering of development away from common flight paths is encouraged.

4 ADDITIONAL ALUC POLICIES FOR CALISTOGA GLIDERPORT

4.1.1 At the west end of the Gliderport, a runway safety zone shall be established in which structures are prohibited. The runway safety zone shall extend 60 feet on either side of the runway centerline and extend 800 feet west of the threshold to Runway 10R.

5 ADDITIONAL ALUC POLICIES FOR NAPA COUNTY AIRPORT

5.1.1 Proposed residential land use designations **may** be considered compatible within the Outer Approach/Traffic Pattern area (Zone DA) provided that the proposal meets all of the following criteria:

(a) The proposal incorporates an open space component oriented along the extended runway centerline which addresses the potential for aircraft (stall-spin) accidents. All occupied buildings should be set back to the maximum extent feasible from the extended runway centerline.

(b) An acoustical study which demonstrates that noise attenuation measures that are incorporated into the building design would provide a maximum interior noise level of 45 dBA based upon anticipated single-event noise levels from jet aircraft overflights.

APPENDIX E

Table 2-1

Noise Compatibility Guidelines

LAND USE CATEGORY	CNEL, dBA 50-55	55-60	60-65	65-70	70-75
Residential					
Single family, nursing homes, mobile homes	+	o	–	—	
multi-family, apartments, condominiums	++	+	o	—	
Public					
schools, libraries, hospitals	+	o	–	—	—
churches, auditoriums, concert halls	+	o	o	–	—
transportation, parking, cemeteries	++	++	++	+	o
Commercial and Industrial					
offices, retail trade	++	+	o	o	–
service commercial, wholesale trade, warehousing, light industrial	++	++	+	o	o
general manufacturing, utilities, extractive industry	++	++	++	+	+
Agricultural and Recreational					
cropland	++	++	++	++	+
livestock breeding	++	+	o	o	–
parks, playgrounds, zoos	++	+	+	o	–
golf courses, riding stables, water recreation	++	++	+	o	o
outdoor spectator sports	++	+	+	o	–
amphitheaters	+	o	–	—	—

LAND USE AVAILABILITY		INTERPRETATION/COMMENTS
++	Clearly Acceptable	The activities associated with the specified land use can be carried out with essentially no interference from the noise exposure.
+	Normally Acceptable	Noise is a factor to be considered in that slight interference with outdoor activities may occur. Conventional construction methods will eliminate most noise intrusions upon indoor activities.
o	Marginally Acceptable	The indicated noise exposure will cause moderate interference with outdoor activities and with indoor activities when windows are open. The land use is acceptable on the conditions that outdoor activities are minimal and construction features which provide sufficient noise attenuation are used (e.g., installation of air conditioning so that windows can be kept closed). Under other circumstances, the land use should be discouraged.
–	Normally Unacceptable	Noise will create substantial interference with both outdoor and indoor activities. Noise intrusion upon indoor activities can be mitigated by requiring special noise insulation construction. Land uses which have conventionally constructed structures and/or involve outdoor activities which would be disrupted by noise should generally be avoided.
—	Clearly Unacceptable	Unacceptable noise intrusion upon land use activities will occur. Adequate structural noise insulation is not practical under most circumstances. The indicated land use should be avoided unless strong overriding factors prevail and it should be prohibited if outdoor activities are involved.

2
Compatibility Concerns

The principal land use impacts and compatibility considerations associated with airport activities fall into four categories.

- **Noise** — Usually perceived as the most significant adverse impact of airport activity because of its routine, everyday occurrence. Human sensitivity to noise varies considerably depending upon the circumstances in which the noise occurs.

- **Hazards to Flight** — To protect the navigable airspace by preventing physical obstructions and other land use characteristics that could affect flight safety.

- **Safety on the Ground** — Limiting people's exposure to risks of injury or damage to property in the event of an aircraft accident. These risks are difficult to address because of the low probabilities involved.

- **Overflights** - A largely subjective impact related to both noise and safety concerns. It has been documented in this Plan as a separate impact category, evidenced by the annoyance expressed by people living near airports that are well outside of the typically defined noise and safety zones.

NOISE IMPACTS

Assessment of Airport Impacts

Airport noise is particularly complex to measure because of the widely varying characteristics of the individual sounds and the intermittent nature of their occurrence. In an attempt to provide an appropriate measure of airport noise impacts, various composite noise level descriptors have been devised. The descriptor used in California to measure cumulative noise impact is the Community Noise Equivalent Level (CNEL). CNEL values are calculated using a complex set of equations based upon several factors:

LANDING EMERGENCIES

LANDING WITHOUT POWER

When assured of reaching the landing site selected, and on final approach:

1. Fuel Selector Valve - OFF
2. Mixture - IDLE CUT-OFF
3. Magneto/Start Switch - OFF
4. Flaps - DOWN (30°)
5. Landing Gear - DOWN or UP (depending upon terrain)

NOTE

On S/N E-2458, E-2468 and after, the landing gear will not retract unless the throttle is in a position corresponding to approximately 17 in. Hg manifold pressure or above.

6. Airspeed - ESTABLISH 85 KTS
7. Battery and Alternator Switches - OFF

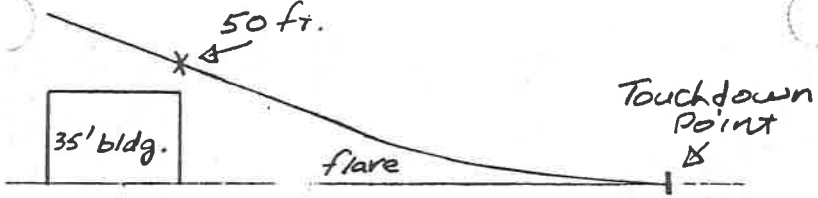
LANDING GEAR RETRACTED - WITH POWER

If possible, choose firm sod or foamed runway. Make a normal approach, using flaps as necessary. When sure of reaching the selected landing spot:

NOTE

On S/N E-2458, E-2468 and after, the landing gear will not retract unless the throttle is in a position corresponding to approximately 17 in. Hg manifold pressure or above.

1. Throttle - CLOSED
2. Mixture - IDLE CUT-OFF
3. Battery, Alternator, and Magneto/Start Switches - OFF
4. Fuel Selector Valve - OFF
5. Keep wings level during touchdown
6. Get clear of airplane as soon as possible after it stops



1005 ft. from obstacle To Touchdown

This chart is based on 80 knots with some power. The minimum approach speed without power is 85 knots (97 mph). (See attach. number 10).
The standard correction for + 5 knots approach speed increase is 300 ft. added to the flare distance.
No head wind used as it can not be relied upon at time of Emergency landing.

The landing roll (or skid) with The wheels up has not been Tested and would vary with the condition of the landing surface.

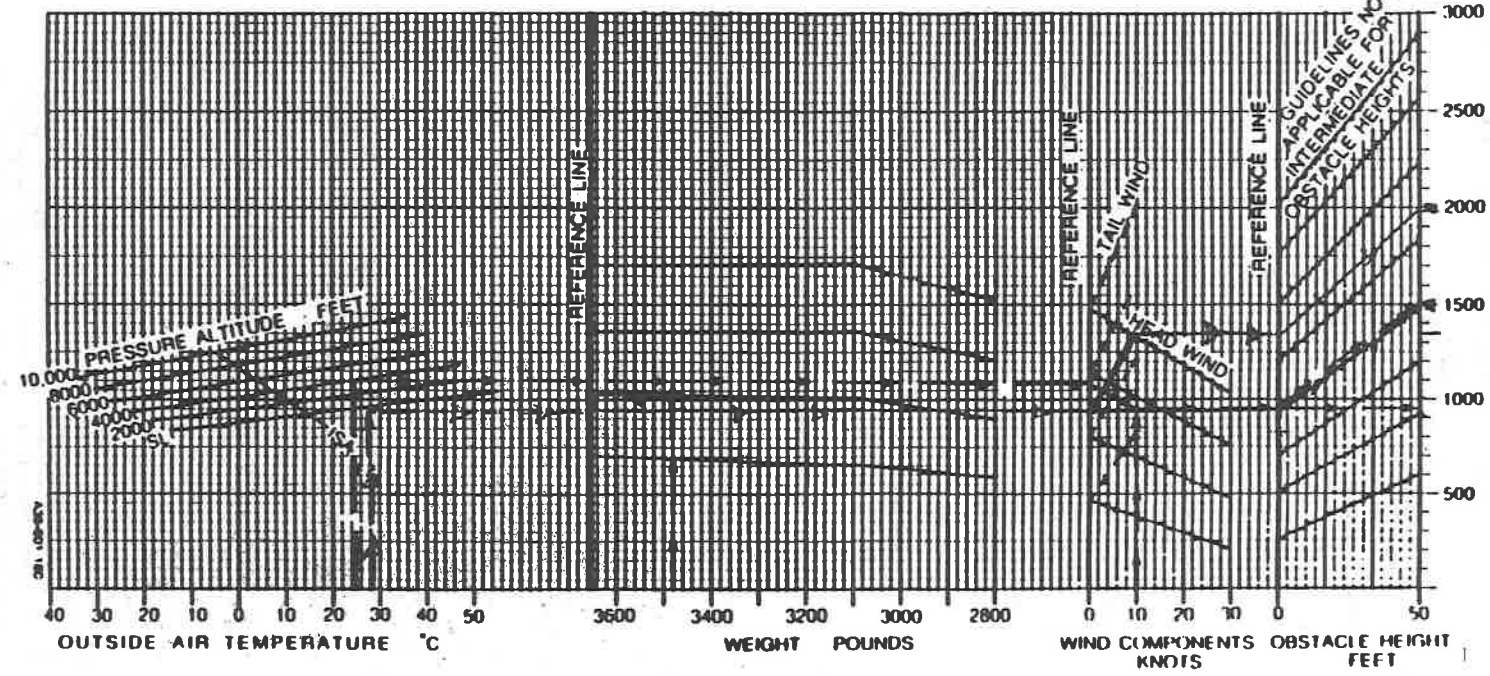
LANDING DISTANCE

ASSOCIATED CONDITIONS	
POWER	RETARDED TO MAINTAIN 900 FT/MIN ON FINAL APPROACH
FLAPS	DOWN (AMBER)
LANDING GEAR	DOWN
RUNWAY	PAVED, LEVEL, DRY SURFACE
APPROACH SPEED	IAS AS TABULATED
BRAKING	MAXIMUM

WEIGHT POUNDS	SPEED AT 50 FT KNOTS
3650	79
3400	80
3200	81
3000	81
2800	78

EXAMPLE

OAT	25°C
PRESSURE ALTITUDE	3965 FT
WEIGHT	3479 LBS
HEADWIND COMPONENT	10 KTS
GROUND ROLL	960 FT
TOTAL OVER 50 FT OBSTACLE	1515 FT
APPROACH SPEED	80 KTS



Based on 28°C and average Training weight of 3500 lbs.

1555
- 900
555
+ 300
855
+ 150
1005

2000 ft. 15 Tail wind

1500 ft. No wind

1350 ft. 10 kt hdwd

ATTACHMENT 12A

APPENDIX E
Airport Vicinity Land Use Compatibility Criteria

ZONE[9]	LOCATION	IMPACT ELEMENTS	MAXIMUM DENSITIES			REQUIRED OPEN LAND[3]
			Residential (du/ac)[2]	Other Uses (people/ac)[2]		
				In Structures	Total In and out of Structures	
A[11]	Runway Protection Zone and Primary Surface	• High risk • High noise levels • Low overflights below 50' AGL	0	0	10	All Remaining
B	Inner Approach/Departure Zone	• Substantial risk • High noise levels • Low overflights below 100' AGL	0	10	25	50%
C	Outer Approach/ Departure Zone	• Moderate risk • Substantial noise • Low overflight below 500' AGL	0	50	75	30%
D	Traffic Pattern	• Moderate risk • Frequent noise intrusion • Routine overflights below 1,000' AGL	0	100	150	25%
E	Common Flight Paths	• Limited risk • Frequent noise intrusion • Overflight annoyance	Low density[8]	150	300	Note 8
F	Other Airport Environs	• Low risk • Overflight annoyance	See Note 8			

1. Residential land use and zoning designations should not allow more than the indicated number of dwelling units per gross acre. Units can be clustered to meet open land criteria. Maximum net density in any area should not exceed three times the acceptable gross density. The residential restrictions do not apply to residential uses allowable under agricultural land use and zoning designations.

2. The use should not attract more than the indicated number of persons per net acre. Net acreage is the total site area inclusive of parking areas and landscaping, less the area dedicated for streets. These densities are intended as general planning guidelines to aid in determining the acceptability of proposed land uses. Clustering of development within the density parameters should be encouraged to protect and provide open space/safety areas.

3. Open land requirements apply to the gross area of all lands within each distinct compatibility zone. The indicated percentage of open land should remain free of structures and other major obstacles. To be considered open land, the area must be sufficiently large and unobstructed to enable an aircraft to make an emergency landing with a high probability of no serious injuries to the occupants of the aircraft or major damage to structures on the ground. The minimum size for such areas is 75 feet wide by 300 feet long. Roads and adjacent landscaping qualify if they are wide enough and not obstructed by large trees, signs, or poles. These areas should be oriented as close as practical to the common direction of aircraft flight over the area. Building envelopes and the approach surfaces should be indicated on proposed development plans (i.e., tentative map) in order to establish the amount and configuration of open land areas.

4. Dedication of an avigation or overflight easement deed notice is required as a condition for new development within all zones. Also, height limit restrictions are applicable to structures and trees in all zones in accordance with Federal Aviation Regulation Part 77 and local ordinances. Uses which may be hazardous to flight are prohibited in all zones.

5. These uses typically can be designed to meet the density requirements and other development conditions listed.

6. These uses typically do not meet the density requirements and other development conditions listed. They should be allowed only if a major community objective is served by their location in this zone and if mitigation measures are incorporated that will minimize potential conflicts.

7. NLR = Noise Level Reduction; i.e., the attenuation of sound level from outside to inside provided by the structure.

8. Maximum densities and open land requirements in accordance with adopted General Plans and zoning designations.

9. In the event that a parcel is substantially affected by two or more compatibility zones, the more restrictive criteria shall apply to the entire parcel until such time as the parcel is subdivided.

10. The purpose of this criteria is to provide a basis for determining those land uses which are compatible with airport activities. Specific land uses will be allowed only if they are also consistent with applicable General Plan policies and zoning ordinances.

11. All lands in Zone A are either within the Airport's boundaries or designated for acquisition in the Airport Master Plan.

Airport Vicinity Land Use Compatibility Criteria

ZONE	LOCATION	IMPACT ELEMENTS	MAXIMUM DENSITIES		
			Residential[2]	Other Uses (people/ac)[2]	
				In Structures	Total in and out of Structures
A[9]	Runway Protection Zone and Primary Surface	- High risk - High noise levels - Low overflights below 50' AGL	0	0	10
B	Inner Approach/Departure Zone	- Substantial risk - High noise levels - Low overflights below 100' AGL	1 du/40 ac	10	25
C	Approach/Departure Zone	- Moderate risk - Substantial noise - Low overflights below 300' AGL	1 du/40 ac	50	75
DA	Outer Approach/ Extended Traffic Pattern	- Moderate risk (turning movements) - Frequent noise intrusion (jets) - Routine overflights below 800' AGL	Low density 1 du/5 ac	75	100
D	Traffic Pattern	- Moderate risk - Frequent noise intrusion - Routine overflights below 1000' AGL	1 du/40 ac	100	150
E	Common Flight Paths	- Limited risk - Frequent noise intrusion - Overflight annoyance	.[7]	150	300
F	Other Airport Environs	- Low risk - Overflight annoyance	See Note 7		

1. Residential land use and zoning designations are considered incompatible uses within the traffic pattern area (Zones A, B, C, and D) where aircraft overflights are frequent and at low altitude. The residential restrictions do not apply to residential uses allowable under agricultural land use and zoning designations.

2. The use should not attract more than the indicated number of persons per net acre. Net acreage is the total site area inclusive of parking areas and landscaping, less the area dedicated for streets. These densities are intended as general planning guidelines to aid in determining the acceptability of proposed land uses. Clustering of development within the density parameters should be encouraged to protect and provide open land/safety areas.

3. Dedication of an avigation or overflight easement or deed notice is required as a condition for new development within all zones. Also, height limit restrictions are applicable to structures and trees in all zones in accordance with Federal Aviation Regulation Part 77 and local ordinances. Uses which may be hazardous to flight are prohibited in all zones.

4. These uses typically can be designed to meet the density requirements and other development conditions listed.

5. These uses typically do not meet the density requirements and other development conditions listed. They should be allowed only if a major community objective is served by their location in this zone and if mitigation measures (i.e., noise attenuation) are incorporated that will minimize potential conflicts.

6. NLR = Noise Level Reduction; i.e., the attenuation of sound level from outside to inside provided by the structure. Noise level reduction measures may be required in areas with high single-event noise levels and where noise-sensitive uses (schools, libraries, etc.) are proposed. Refer to Appendix C for criteria and noise attenuation measures.

7. Maximum residential densities in accordance with local adopted General Plans and zoning designations. Consideration should be given to the proximity of flight patterns, frequency of overflight, terrain conditions, and type of aircraft in determining acceptable locations of residential uses. Referral to the ALUC for review of development plans prior to approval is recommended.

8. The purpose of these criteria is to provide a basis for determining those lands uses which are compatible with airport activities. Specific land uses will be allowed only if they are also consistent with applicable General Plan policies and zoning ordinances.

9. All lands in Zone A are either within the Airport's boundaries or are recommended for air space acquisition in the Airport Master Plan and designated for future Clear Zone Study in the relevant Specific Plan.

I U. S. DEPARTMENT OF TRANSPORTATION XI
FEDERAL AVIATION ADMINISTRATION

IV NAME
CARL JOSEPH KANGAS
V ADDRESS
37 MAIDU CT
NAPA, CA 94558-6302

VI NATIONALITY: USA
D.O.B.: 24 JUN 1939
SEX: M HEIGHT: 69 WEIGHT: 160 HAIR: BROWN EYES: BLUE

IX HAS BEEN FOUND TO BE PROPERLY QUALIFIED TO EXERCISE THE PRIVILEGES OF
II FLIGHT INSTRUCTOR
III CERTIFICATE NUMBER 1378795CFI
X DATE OF ISSUE 20 MAR 1997

VII SIGNATURE OF HOLDER
XIV
VIII ACTING ADMINISTRATOR

I. UNITED STATES OF AMERICA XI.
Department of Transportation — Federal Aviation Administration

THIS CERTIFIES IV. CARL JOSEPH KANGAS
THAT V. STAR ROUTE STANLEY ROAD
000048162 WEST POINT CA 95252

DATE OF BIRTH	HEIGHT IN	WEIGHT	HAIR	EYES	SEX	NATIONALITY VI.
06-24-39	69	150	BROWN	BLUE	M	USA

IX. HAS BEEN FOUND TO BE PROPERLY QUALIFIED TO EXERCISE THE PRIVILEGES OF
II. FLIGHT ENGINEER III. CERT. NO. 2271649
RATINGS AND LIMITATIONS
XII. TURBOPROPELLER POWERED TURBOJET POWERED

XIII.
VII. SIGNATURE OF HOLDER
X. DATE OF ISSUE 01-25-78
X. VIII. ADMINISTRATOR

I. UNITED STATES OF AMERICA XI.
Department of Transportation — Federal Aviation Administration

THIS CERTIFIES IV. CARL J KANGAS
THAT V. STAR ROUTE STANLEY ROAD
WEST POINT CA 95255

DATE OF BIRTH	HEIGHT IN	WEIGHT	HAIR	EYES	SEX	NATIONALITY VI.
06-24-39	69	150	BROWN	BLUE	M	USA

IX. HAS BEEN FOUND TO BE PROPERLY QUALIFIED TO EXERCISE THE PRIVILEGES OF
II. MECHANIC III. CERT. NO 330327862
RATINGS AND LIMITATIONS
XII. AIRFRAME POWERPLANT

XIII.
VII. SIGNATURE OF HOLDER
X. DATE OF ISSUE 07-07-79
X. VIII. ADMINISTRATOR

I. UNITED STATES OF AMERICA XI.
Department of Transportation - FEDERAL AVIATION ADMINISTRATION

THIS CERTIFIES IV. CARL JOSEPH KANGAS
THAT V. 2351 WASHINGTON ST #101
SAN FRANCISCO CALIF 94115

DATE OF BIRTH	HEIGHT IN	WEIGHT	HAIR	EYES	SEX	NATIONALITY VI.
06-24-39	69	150	BROWN	BLUE	M	USA

IX. HAS BEEN FOUND TO BE PROPERLY QUALIFIED TO EXERCISE THE PRIVILEGES OF
II. GROUND INSTRUCTOR III. CERT. NO. 2200742
RATINGS AND LIMITATIONS
XII. BASIC GROUND INSTRUCTOR

XIII.
VII. SIGNATURE OF HOLDER
X. DATE OF ISSUE: 10-13-72
X. VIII. ADMINISTRATOR
AC FORM 8060-1 (8-71)

I. UNITED STATES OF AMERICA X.
Department of Transportation — Federal Aviation Administration

-3 CERTIFIES IV. CARL JOSEPH KANGAS
HAT V. STAR ROUTE STANLEY RD.
330327882 WEST POINT CA 95255

DATE OF BIRTH	HEIGHT IN.	WEIGHT	HAIR	EYES	SEX	NATIONALITY VI.
06-24-39	69	150	BROWN	BLUE	M	USA

HAS BEEN FOUND TO BE PROPERLY QUALIFIED TO EXERCISE THE PRIVILEGES OF
AIRLINE TRANSPORT PILOT III. CERT NO 1378795
RATINGS AND LIMITATIONS
AIRPLANE SINGLE & MULTIENGINE LAND
DC-3
COMMERCIAL PRIVILEGES
AIRPLANE MULTIENGINE SEA

SIGNATURE OF HOLDER
DATE OF ISSUE 08-12-77 VIII. ADMINISTRATOR

UNITED STATES OF AMERICA
Department of Transportation
Federal Aviation Administration

MEDICAL CERTIFICATE SECOND CLASS

This certifies that (*Full name and address*):

CARL JOSEPH KANGAS
37 MAIDU CT.
NAPA, CALIF. 94558

Date of Birth	Ht.	Wt.	Hair	Eyes	Sex
6/24/39	69	156	BROWN	BLUE	M

has met the medical standards prescribed in Part 67, Federal Aviation Regulations, for this class of Medical Certificate.

Limitations: HOLDER SHALL WEAR CORRECTIVE LENSES

Date of Examination	Examiner's Serial No.
3/21/97	17655-1

Examiner — Signature
Typed Name George Friedman MD

AIRMAN'S SIGNATURE

FAA Form 8500-9 (7-92) Supersedes Previous Edition

STANLY RANCH

"A CAREFREE Resort Community"



January 20, 1998

HAND DELIVERY

GENERAL PLAN COMMUNICATION # 46

John Yost, Director
City of Napa Planning Department
P.O. Box 660
Napa, CA 94559-0660

Dear Mr. Yost:

We have recently reviewed the three documents published on December 8, 1997 relating to the Draft EIR for Envision Napa 202 – City of Napa General Plan. We have the following three comments.

1. Response to Comments Document. Standard Response to Stanly Ranch, page 9.

   In the entry under background, please add that the City's EIR consultant began the preparation of the Draft EIR for the Draft Specific Plan and General Plan Amendment in June, 1997.

   46.1 G

2. Response to Comments Document. Standard Response to Stanly Ranch, page 11.

   In the second paragraph under Visual analysis, please note that since the submission of the Draft Stanly Ranch Specific Plan in May, 1997, we have discovered that the existing eucalyptus windrows have been infested by the Eucalyptus Longhorned Borer. As a result of the devastation and tree mortality caused by the Borer, the existing eucalyptus windrows will be replaced with other species of trees which over time will perform the same screening function as the existing windrows now perform.

   46.2 G

3. Addenda 1 Through 9. Addendum #7 Wastewater.

   It is our understanding that the proposed revision to Policy CS-10.3 would not preclude the construction of an on-site wastewater treatment and disposal facility to serve Stanly Ranch, in the event that Napa Sanitation District has notified the City that a critical capacity situation exists.

   46.3 G

1451 STANLY LANE NAPA, CA 94559 (707) 258-2729 FAX (707) 258-1543

Thank you for the opportunity to comment on the three Draft EIR documents. Please feel free to call me if you have any questions.

Sincerely,

Tom Kambe
Project Manager

TK:dab/TK147

Deborah Faaborg
Gen. Plan Project Manager
City of Napa Planning Dep.
P O Box 660
Napa, CA 94559

January 19, 1998

GENERAL PLAN COMMUNICATION # 47

Dear Ms Faaborg,

I have reviewed the various general Plan and environmental documents and have a few important comments.

Page 46 Response Document-Response 13.7E to the Napa County Counsel comment is wrong. The Stanly Ranch proposed develop- has no implied and no expressed or vested rights to be approved. After the Longwood Ranch case, annexations to the City of Napa or Napa Sanitaion District are subject to initiative. The Stanly Ranch is not annexed to the Napa Sanitation District.
Political risk factors such as moratoriums, initiatives, public hearings, denial or downscaling by reviewing agencies, tight money policies, and lower public investments for highway grade separated intersections, schools, water supply or sewerage apply to the proposed development.

47.1 G

Page 4-1 Draft EIR-4.2 Unavoidable adverse impacts.
The CEQA definitions of significant affects and functional equivalent laws do not support your eroneous fiction that "No effects were found to be significant, because policies and programs included as part of the project would serve to mitigate potential environmental impacts."
The project will cause many of the listed significant effects listed in Appendix G of CEQA:

47.2 E

TRAFFIC;Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system. In fact page 15 of the response document states"For purposes of EIR analysis, LOS F would therefore be considered significant. In fact, Response Document, Page 33 shows 5 intersections at the significant level of service (LOS) F.

Thank you for the opportunity to comment.

Sincerely,

James O'Loughlin

James O'Loughlin
1449 Sheridan Dr.
Napa, CA 94558



34

Napa County Sierra Club

P. O. Box 644, Napa, CA 94558

January 21, 1998

GENERAL PLAN COMMUNICATION # 48

John Yost
City of Napa Planning Department
P. O. Box 660
Napa, CA 94559

Re: Comments on Revised Draft Environmental Impact Report for the Draft Napa General Plan

Dear Mr. Yost:

Below are our comments on the RDEIR.

LAND USE

Airport Land Use Compatibility.
The impact assessment (P. 3.2-8) suggests public exposure to aircraft hazards on property within the City and Airport Compatibility Planning Area would be insignificant. Two reasons are provided for this determination: the project requires review by the Airport Land Use Commission (ALUC); and the proposed General Plan policies require that land uses be restricted and safety standards imposed in accordance with the Airport Land Use Compatibility Plan (ALUCP).

48.1 E

The RDEIR should be submitted to the Napa County ALUC for comments. If this has not yet been done, the comment period should be extended for this purpose.

48.1 E

Information recently presented to the ALUC indicates the ALUCP is in error regarding some maps of flight paths, compatibility zones, and noise contours. The information also suggests that public exposure to aircraft emergency landing hazards is likely in areas outside those identified in the 1991 ALUCP and within the City jurisdiction at the Stanly Ranch. The ALUC voted unanimously at its regular meeting of November 19, 1997 to begin the process of ALUCP revision to address these issues.

The EIR should address the significance of impacts in light of this new information and with respect to the proposed land use designations for properties within the City that are covered by the ALUCP.



35

VISUAL RESOURCES

The EIR evaluation of impacts does not contain an analysis of aesthetic impacts to neighborhoods in the westernmost portion of the city where development of hillsides would be accomodated by proposed General Plan policies. Maintaining the current RUL in this area leaves steep hillsides and high elevation promontories available for residential development. These areas, shown on Policy Document Figures 8-3 and 8-4, cover a relatively large area and are highly visible from neighborhoods in the vicinity. Mitigation of visual impacts on hillsides in this area may be very difficult. It would be appropriate to address the visual impacts at the General Plan EIR level. 48.2 E

New information is now available regarding the need to remove most of the large Eucalyptus trees from the Stanly Ranch in order to accommodate development there. The EIR environmental evaluation should address the visual impacts that would be caused by proposed urban development of the Stanly Ranch property with removal of these trees. 48.3 E

NOISE

The impacts of aircraft noise on residents of Napa is not addressed in the EIR. Information has been presented recently to the Airport Land Use Commission regarding noise generated by the types of aircraft in common use at the Napa County Airport. This suggests that aircraft noise may become problematic in some areas, especially those designated for residential use in the Policy Document. The proposed land use designations at Stanly Ranch would accommodate residential development directly within the flight pattern of training aircraft using the Napa County Airport. 48.4 E

The EIR should address the impact significance of aircraft noise on would-be residents of the Stanly Ranch.

NATURAL RESOURCES

The RDEIR discussion of impacts that may be caused by pesticide use in the City does not adequately address potential impacts on water quality or wildlife. Language appearing on P. 4-7 mentions that "imposition of controls" could mitigate for water quality impacts caused by fertilizers and pesticides. But the potential impact is then dismissed as "irrelevant within the RUL." No basis for this determination is provided. 48.5 E

Maps in the Policy Document show numerous properties within the City abutting creeks and streams. Each of these properties represents a potential direct entryway for pesticides into local waterways.

Several types of pesticides are currently available through "over the counter" sales to Napa residents and businesses. These include chemicals such as Diazinon, Dursban, Copper Sulfate, Captan, and Carbaryl. These materials can have serious effects on wildlife and fish resources when released even in minute quantities to waterways. Diazinon is a good example. It is

considered "extremely toxic to birds and mammals" (see CA Wildlife and Pesticides, a booklet produced by the CA Dept. of Fish and Game), with an LC50 at a concentration as low as .09 ppm.

Wildlife kills have been reported in numerous instances where granular formations of pesticides have been applied to golf courses. The City has one golf course near the Napa River where migratory waterfowl and other wildlife are prevalent and another that is planned at the Stanly Ranch, which also borders the Napa River. The potential impacts to wildlife from the application of certain formations of pesticides should be addressed in the EIR.

48.5 E

48.5 E

The EIR should also address the significance of impacts to waterways and wildlife that may be caused by accidental application or release by homeowners of commonly available fertilizers and pesticides, particularly during low flow seasons when chemicals may not be easily diluted or flushed from streams. Mitigation in the form of some substantial support for educational efforts like those considered in the GP Policy document would go a long way toward reducing these potential impacts.

Yours Truly,

Dave Briggs
Group Secretary

37

San Francisco Bay Regional Water Quality Control Board
2101 Webster Street, Suite 500, Oakland, CA 94612 (510) 286-1255 Fax: 286-1380

January 21, 1997

Deborah Faaborg
General Plan Project Manager
Planning Department
City of Napa
PO Box 660
Napa, CA 94559

GENERAL PLAN COMMUNICATION # 49



RE: **Comments to Revised General Plan, *Envision 2020***

We would like to thank the City of Napa Planning Department for this opportunity to comment on the Revised Draft General Plan, and the companion Draft Environmental Impact Report (EIR) and Addenda. In our comments below, we refer to these documents collectively as the *General Plan*. Staff of the Regional Board intend to work with the various departments of the City of Napa to minimize non-point and urban storm-water pollution through a variety of approaches that are programmatic, technological and regulatory. Therefore, we see the General Plan as a foundation from which to build and strengthen the City's water quality program.

We feel that various sections of the General Plan do not always have the level of specificity necessary to direct various departments to protect and enhance water quality in the Napa River and its tributaries. While we acknowledge that the General Plan must be in place for many decades, we feel that more detail and explanation should be in many of the policies. The General Plan should describe implementation measures as much as possible under each policy statement. We also found that the General Plan does not fully assess the impacts to wetlands and other sensitive habitats, especially in the area of new development. Lastly, we find it disappointing that the City did not embrace the vision of a river-front theme, as expressed by the *Friends of the Napa River* in their comment letter. By focusing attention on the river as a discrete planning element, the City could provide long-term environmental benefit by providing public awareness and stewardship of the river and its beneficial uses. 49.1G 49.2E 49.3G

The impacts of current storm-water pollution and new home construction are only partially addressed by the various policies and planning *Goals* of the General Plan. Some policies ignore the problem of polluted urban storm-water; whereas, others provide only a very brief mention of water quality with no explanation of implementation. For example, the new standards for street design do not appear to take into account the need to minimize impermeable surfaces in new developments. (Addendum #5). Under the Community Services goal related to drainage, CS-11, which calls for a[n] "...environmentally sensitive drainage system," we find only vague suggestions of how the City plans to proceed with implementation. We note that under the 49.4G

Implemetation Programs section there is a requirement for the City to update its stormdrain Master Plan. Yet again, there is no mention of pollution or new housing development anywhere in this section, nor is there an explanation of implementation. Similarly, several policies under CS-11 (11.4 and 11.5 and 11.6) make mention of new development review, NPDES permits and Best Management Practices (BMP) but do not describe how the City plans to incorporate these requirements into its everyday work. Additionally, the requirement that new development should not result in an increase in peak storm-water flows seems to have been left out of this and other sections altogether.

49.4 G

With respect to land use, we find the City's planning objectives and polices found in Chapter 1 encouraging. Regarding new development, we applaud the City's stance on "sensitive urban use" along the riverfront the City's statements about an environmentally sound approach to flood control (Urban Form and Open Space section, page 1-21). We also approve of the City's desire to "establish special development standards which protect existing sensitive resources such as hills and wetlands." However, we are concerned that there is a concern that these objectives will not be realized through implementation by the various programs and departments of the City. Under the *Implementation Programs* section for commercial development, there is a requirement that the City shall: "...prepare and adopt design guidelines...to guide...scale, massing, and parking area design of new commercial developments..."(LU-5.A). Yet, there is no mention of requiring storm-water and urban runoff pollution control measures. Such measures must be incorporated into City polices and guidelines now, in order for the City to build an effective urban storm-water pollution control program.

49.5 G

While we certainly do not disagree with these policies, we can not accept the finding of the EIR that impacts to these species will be reduced to an "insignificant level" simply by keeping track of resources and referring applicants to other agencies. The General Plan should briefly describe how the City will ensure that project applicants obtain federal and state permits, clearances, etc., and how the City will monitor compliance after the permits have been issued.

49.6 G

For lands adjacent to the Napa River, the shoreline should be the primary focus in City's General Plan, rather than merely one planning element (Response 24.13G). The General Plan should encourage planning that embraces the river as a "theme." We know of countless communities across the country that have enhanced their urban rivers and streams resulting in an environmental-economic "win-win" situation. In the eyes of the Public, the waterway running through their community can be changed from a liability and merely a storm-water conveyance structure, into a community asset. The River could be the centerpiece of the commercial downtown area, and in a tranquil green corridor joined with adjacent park lands in other areas. The effect of this would be that the waterway will return higher land values to the city and downtown business revenues to the larger community. This would also place a higher aesthetic value on the river which, in turn instills even more civic pride. The way in which the City treats the Napa River in the its land-use plans will have a certain effect on the health of the river and its tributaries. For example, we would expect to see reductions in illegal stormdrain dumping, and a bolstering of support for ecological restoration when there is more public awareness of, and interest in the River. This can only happen when the community, as represented by its local government, becomes committed to caring for the overall health of the river system.

49.7 G

Thank you for consideration of these comments. I look forward to working with the Planning Department in the coming months on this plan and on other important projects. If you have questions or comments, you can reach me at (510) 286-0841.

Sincerely,

Thomas R. Gandesbery
Environmental Specialist

cc: Friends of the Napa River
Oscar Baleguer, SWRCB, Non-point Section

trg/genpln.doc



January 21,1998

Planning Commission and
Jon Yost, Planning Director
Planning Department,
1600 First Street
Napa, Ca. 94559-0660

GENERAL PLAN COMMUNICATION # 50

Concerning: The City of Napa General Plan, "Envision Napa 2020" and the meetings of 1998.

Planning Department;

I have concerns regarding the new General Plan; I do not believe that the citizens of Napa have had sufficient time to read, understand, nor respond to the current three (nor the total seven) documents that have been prepared by the City of Napa Planning Department regarding the new General Plan. It is often necessary to cross-reference (as noted in the preface of of the City of Napa General Plan, Response to Comments page iv: "Although the Revised DEIR, the Response to Comments and the Addenda have been bound separately, the information is interconnected and the documents should be read in concert."). If one takes into consideration that the primary availability of these documents for response was from Dec. 8,1997 to Jan 21,1998, and that these forty-five days encompassed the Holiday Season, (a time of the year when many families are traveling) it is obvious that it would be unrealistic for many to respond.

50.1 G

Currently, the primary concern of many individuals is with the River Project and Measure A. Doesn't it seem that it would be beneficial to implement an extension of time for public review, particularly considering the legal holidays that this time period encompasses?

It has come to my attention that the Planning Commission and the City Council may be planning to meet but one time to discuss the General Plan. I am opposed to this. If the meetings of the BRRSP project ran late into the night concerning just a portion of the City of Napa, then how can a document of this importance be open to discussion and voted upon at only one meeting? It seems that there are over 1,000 pages of information, and that these documents are to guide the development of our community over twenty years.

50.2 G

As a concerned citizen I wrote to the Planning Department with my concerns of the General Plan Draft EIR and feel that the responses often overlook my questions altogether, or do not adequately relate to the question.

50.3 G

There are issues such as the incorporation of four separate parcels of land into the RUL, flooding, and roadways that need more public input. Isn't it necessary to have a holistic

H

approach to the development of the City of Napa? When the River Project meetings have occurred we have had a very large involvement of diverse members of the community. Wouldn't it be beneficial to have input from the public to discuss different aspects of this Plan as well? Shouldn't we have more public meetings rather then less? 50.3 G

The existing storm drain systems have been unable to accommodate the winter rains of 1982, 1986, 1992,1995,1996, nor 1997. Many people have written to the planning department voicing their concerns about the tributaries to the Napa River and have been referred to, "Standard Response Flood Control" of pages 23-25 and "Response to Individual Comments" section 2.3 and 19.1 (pages 26 and 52). I do not believe that these are sufficient answers. These sections give examples of the retention ponds of the South Napa Market Place which has not yet proved its usefulness and Silverado Creek which has not yet been developed. The Silverado Creek retention pond was not approved to retain all of the runoff that will be diverted when development occurs in the Linda Vista and Vintage planning areas of 3,000 to 4,000 units, but rather for a development of 185 homes. The Responses do not adequately address the questions. 50.4 E

I am concerned that the River Project's North boundary is Trancas St. Though, I believe that it is necessary to take care of the River, with the New General Plan, the greatest increase of runoff from the North/North-Western areas will be diverted through the Salvador Channel to join the Napa River at this location. The Salvador Channel can not contain more runoff. It is probably the only tributary, within the city limits, that is not affected by salt-water. It flows all year into the greater waterways, and, it is the last tributary available that could be used to preserve a fresh-water floodplain in the City of Napa. Has the City explored means to retain water for use during the dry seasons? 50.5 E

Additionally, there are two parcels located at Trancas St. and proposed to be included in the RUL (that 40 acre section, located at the corner of Trancas and Big Ranch Road, across the street from Payless, with a suggested maximum of up to 40 units per acre on some parcels, as well as, the five acres located at Silverado Trail, with suggestions of a 50 or 60 room hotel), will be diverting water to the Napa River at or near Trancas Street. When will there be more studies at this location? 50.6 E

There are inconsistencies in these documents. In the Revised Draft EIR page 2-16, under the heading "Growth Forecasts for the Year 2020" and Table 2-3, projects a 46 % increase of dwellings in the Linda Vista area and projects a 51% increase of dwellings in the Vintage area. Yet a response on page 52, 19.1E, indicates that "The maximum potential development for the Linda Vista Planning Area is 8.8% and the Vintage Planning Area is 11%." Which is the correct percentage? 50.7 E

I attended all of the meetings concerning the Big Ranch Road Specific Plan. One of the greatest concerns to the residents of this area were the proposed Roadway Systems. During the hearing held on September 24, 1996 considerable time was spent on discussion of Roadways. At that time the City Council agreed and voted NOT to connect Sierra Avenue to Garfield Lane, but rather to build a new LOCAL STREET from Villa Lane, North, to Sierra Avenue. At that time they voted NOT to connect Trower to Garfield Lane nor to Rosewood Lane, but rather to Big Ranch Road. Now comes the Revised Environmental Impact Report, Section 3.3, Table 3.3-3 "Future Roadway Improvements" numbers 4 and 5, whereby the Planning Department has both extended Sierra to the Salvador Channel and deleted the Villa Lane connection to Sierra Ave. It was clear that the BRRSP superseded the General Plan in this area.

50.8 G

In essence the City has decided to divert highway traffic (a projected 6,000 cars ?) through the Sierra and Garfield neighborhoods, changing our rural atmosphere. This would bring an increase of environmental concerns to our neighborhood. To divert highway traffic through a neighborhood with a narrow street (Sierra) that does not have sidewalks seems to indicate future taking of land. To divert Highway traffic onto the one-lane bridge at Garfield Lane is dangerous. The City has already built a bridge on Jefferson Street. Wouldn't it be financially suitable to look at other options (the City Council already voted down the replacement of Garfield Bridge)?

There are issues such as the incorporation of 440 acres and four separate parcels of land into the expanded RUL, flooding, and roadways that need more research and more public input. There are questions asked concerning the draft EIR that the City Planning department either doesn't have sufficient information on, or refuses to answer. I think that it is imperative that existing homes and neighborhoods are protected.

50.9 G

Though I believe that the River Project is necessary and that Measure A passes, I am concerned, will it be an incentive for the City to increase development within Napa?

Thank you for your consideration,

Susan Rushing-Hart
73 Garfield Lane, Napa

13

January 17, 1998

GENERAL PLAN COMMUNICATION

51



Ms. Deborah Faaborg
General Plan Project Manager
City of Napa Planning Dept.
P.O. Box 660
Napa, CA 94559

Dear Ms. Faaborg:

RE: Comments on the Revised Draft EIR City of Napa General Plan -- Envision Napa 2020

We are providing comments on behalf of the many residents in the Cayetano Drive/Terrace Drive/Kansas Avenue neighborhoods.

We strongly object to current plans to connect Terrace Drive via bridging over Tulocay/Cayetano Creek. We specifically refer you to page 3.3-7, Item 13, of the Revised Draft Environmental Impact Report. To complete a missing segment over Tulocay Creek would be in direct contradiction to the stated project objectives of the Napa General Plan page S-2:

> Objective 2 -- Conserve the character of existing neighborhoods.
>
> Objective 4 -- Recognize the fragility of Napa's precious natural resources ...

Land Use Policies, Appendix G, Chapter 1:

> LU-9.1 -- The City shall promote an urban form that integrates the urban environment with the City's natural features.
>
> LU-9.3 -- ... and discourage the fragmentation of large natural plant communities when environmentally sensitive sites are developed.

51.1 G

To complete a missing segment over Tulocay Creek would take away a certain small town quality of life and is an unnecessary intrusion into our quiet neighborhood.

Children's safety would be at risk with increased traffic. Currently children walk or bicycle to Phillips Elementary and Silverado Middle Schools.

Emergency response time from the Police and Fire Departments and ambulance service can and have serviced this area on many occasions without difficulty or loss of time.

The California Department of Fish and Game has identified Tulocay Creek as steelhead habitat. The steelhead fish is now an endangered species. Riparian habitat would be destroyed forever for a new bridge. Only 1/4 mile upstream a bridge exists to service this entire neighborhood and residents north of Tulocay Creek.

44

51.1 G

Certainly the cost associated with a new bridge would be expensive and is a waste incurred by all tax paying residents of the City of Napa. The addition of these impermeable surfaces adds surface water runoff directly to the Napa River and compounds flooding. Once again, another foreseeable cost and negative impact to our natural resources.

We appreciate the opportunity to provide our written comments. The many signatories to this letter will show you how strongly our neighborhoods feel and how united we are in opposition to future plans to connect Terrace Drive.

Sincerely,

Kelly A. Gin and Chester D. Gin

Kelly and Chester Gin on behalf of 914 Cayetano Drive

cc: Ed Henderson, Mayor
Brad Wagenknecht, Council Member
Cindy Watter, Council Member
Joanne Busenbark, Council Member
Harry Martin, Council Member
Jill Techel, Council Member
John Yost, Director, City of Napa Planning Department
Mike O'Bryon, City of Napa Public Works Department
John Draper, City of Napa Public Works Department

45

APPENDIX E

ADDENDUM #1 TO JANUARY 17, 1998, LETTER TO MS. DEBORAH FAABORG, GENERAL PLAN PROJECT MANAGER, CITY OF NAPA PLANNING DEPT., FROM KELLY A. AND CHESTER D. GIN

RESIDENTS OF CAYETANO DRIVE/TERRACE DRIVE/KANSAS AVENUE NEIGHBORHOODS WHO ARE IN OPPOSITION TO ITEM #13, TERRACE DRIVE, ON PAGE 3.3-7 OF THE REVISED DRAFT ENVIRONMENTAL IMPACT REPORT, CITY OF NAPA GENERAL PLAN -- ENVISION NAPA 2020 -- SPECIFICALLY, "COMPLETE MISSING SEGMENT OVER CAYETANO CREEK"

Name	Address
DeVaun H. & Karen Snyder	1805 Twin Creeks Ct., Napa
Gene and Geralyn McNeil Rehm	956 Cayetano Dr. Napa
Rodney & Barbara	932 CAYETANO DR. NAPA
Cliff & Kimball Bergen	938 Cayetano Dr. Napa
Thomas E. Marchetti	962 CAYETANO DR NAPA
Karen S. Marchetti	962 Cayetano Dr. Napa -
Christopher Marchetti	962 Cayetano Dr Napa
Hilary Meyer	~~926~~ 926 CAYETANO DR.
Tom Meyer	926 CAYETANO DR.
Peter Savant	968 CAYETANO DR. NAPA, CA.
OLGA VAN KRIEKEN	944 CAYETANO DR NAPA CA
Shaney Green	950 Cayetano Dr. Napa CA
Robert K. Johnson	1150 Kansas Ave Napa CA.
Claudia Bradt	1131 KANSAS AVE NAPA, CA.
MARILYS J. CLARK	974 CAYETANO DR 94559
Terry Degenkolb	75 Belvedere Ct 94559
Jack Hill	1764 Butte Creek Ct Napa 94559
Robert Parker	1900 TWIN CREEK CT 94559
Mary A. Parker	1900 TWIN CREEKS CT 94559
[illegible]	1921 Twin Creeks Ct 94559
Marcia Weissman	1968 S. Terrace Dr. 94559
Jon Hulin	1972 S. Terrace Dr. 94559
Loren S. Bingham	1959 So. Terrace Drive 94559
GEORGE FOSTER	1901 Twin CREEKS CT
Rachel Johnstone	1913 Twin Creeks Ct Napa
Nicole Vaughn	1925 Twin Creek Ct
Dirk Kaan	1937 Twin Creeks Ct.
Cheryl Sakata	1942 Twin Creeks Ct.
Joan Hardridge	1946 Twin Creeks Ct
Gayle Cushman	1956 TWIN CREEKS CT.
Margaret Hayes	1962 TWIN CREEKS CT.
[illegible]	2947 First St
[illegible]	1820 Twin Creeks Ct.

ADDENDUM #1 TO JANUARY 17, 1998, LETTER TO MS. DEBORAH FAABORG, GENERAL PLAN PROJECT MANAGER, CITY OF Nnapa PLANNING DEPT., FROM KELLY A. AND CHESTER D. GIN

RESIDENTS OF CAYETANO DRIVE/TERRACE DRIVE/KANSAS AVENUE NEIGHBORHOODS WHO ARE IN OPPOSITION TO ITEM #13, TERRACE DRIVE, ON PAGE 3.3-7 OF THE REVISED DRAFT ENVIRONMENTAL IMPACT REPORT, CITY OF NAPA GENERAL PLAN -- ENVISION NAPA 2020 -- SPECIFICALLY, "COMPLETE MISSING SEGMENT OVER CAYETANO CREEK"

* BOARD OF DIRECTORS - "BROOKSIDE" HOMEOWNERS ASSN.

Name	Address
R.F. Wallace	1 BELVEDERE CRT
Vicki Ann Marin	12 BELVEDERE CT.
Elaine A. Rankin	92 Belvedere Court
Ruth DeSimone	92 Belvedere Ct.
Katherine A. Wallace	1 Belvedere Ct.

47

California Native Plant Society

January 20, 1998

John Yost
Planning Director
City of Napa Planning Department
P.O.Box 660
Napa, CA 94559-0660

GENERAL PLAN COMMUNICATION # 52

Re: Response to Comments, City of Napa General Plan; 95-03-3060

11.2E In 1973, the city of Napa voted to "cap "the population at 75,000. The responses to comments regarding household size and occupancy do not appear to understand the point. If the document states that the city will include 34,938 units with an anticipated occupancy of 2.55 persons, then the population well exceed the 89,000 person projection. The comment refers to a mathematical fact and does not question the predicatability of actual growth. If the a population goal of 75,000 or 81,000 is to be met, then either the number of permitted households must be reduced or the occupancy rate must be rationally adjusted. 52.1 E

11.3E The response to comment assumes that resources outside of the RUL stand a reasonable chance of preservation when in fact no ordinances, laws, or preservation plans exist within the county. While the city develops at a rate of 10's of acres per year, the county is being developed and converted in the order of 100's to 1,000s of acres per year. Historically, the city of Napa stood in open grasslands and woodlands. More definite language must be included in the general plan if any acreage is to survive for the next generation. Current language provides a large loophole or development and no certain protection. 52.2 E

11.7E The response to the comment recognizes that significant grasslands may exist but plans them away by assuming that containment of development within the RUL guarantees some protection outside. This suggests that little or no action to protect natural communities will be undertaken. I recommend that some mechanism for proactive protection be included in the plan document. 52.3 E

11.8E Data regarding additional sensitive species mentioned was sent to the Dept. of Fish and Game Natural Diversity Database over a year ago. This database is sometimes 6 months to years behind for a variety of good reasons. Up to date information is available at the Napa County Planning Department with whom we have been working for several years to keep current sensitivity maps. 52.4 E

Thank you for your consideration

Jake Ruygt

Napa Valley Chapter, C.N.P.S.

cc: John Pitt
David Magney



Dedicated to the preservation of California native flora

48

APPENDIX E

JAN 1998
RECEIVED
City of Napa
Planning

Louise Clerici
4032 Wisteria Way
Napa, CA 94558
January 20, 1998

Mr. John Yost, Planning Director
Planning Department
P.O. Box 660
Napa, California 94556

GENERAL PLAN COMMUNICATION # 53

Dear Mr. Yost:

I am writing this letter in response to the December 8, 1997 Revised Draft Environmental Impact Report for the City of Napa General Plan.

My comments are as follows:

1. STATEMENT

Page S-4 (Significant Impacts) Line 4 - "Because of the potential for land use conflicts between existing development and new development, the City has crafted a set of residential typologies and a narrower range of permitted densities as a means of avoiding the incompatibility impacts."

53.1G

Comment:

Present General Plan Densities		Proposed General Plan Densities	
ED (Estate District)	0-3 units per acre	SFR (Single Family Residential)	0-7 units per net acre
RL (Residential Low)	3.1-6 " " "	SFI (Single Family Infill)	3-8 " " " "
RM (Residential Medium)	6.1-12 " " "	TRI (Traditional Residential Infill)	2-8 " " " "
RH (Residential High)	12.1-25 " " "	MFR (Multi Family Residential)	10-40 " " " "

In comparing the present General Plan densities with the proposed General Plan densities above, it appears a wider range rather than a narrower range of densities will be used as a means of avoiding the incompatibility impacts.

Please explain.

2. STATEMENT

Page S-10 #4 "Development associated with the Draft General Plan would result in the conversion of existing agricultural uses and prime soils within the city's RUL to urban uses." (S) (Significant impact)

53.2E

Comment:

Under Mitigation Measures column, please list the pages in this document which discusses this impact. This information wouldbe used for quick reference and would indicate to the reader that this important issue has been thoroughly reviewed. This is the only impact you have rated significant without an accompanying statement in the Mitigation Measures column.

3 STATEMENT

Page 2-3 Figure 2-2 -- There are 2 shaded areas that are unidentified in the legend. One is at the corner of Trancas Street and the RUL line and the other is adjacent to the Highway symbol (29/121). The EIR consultant has stated that these 2 areas are both

53.3E county parcels within the RUL but located outside the sphere of influence; therefore both the shading and vertical line treatment shown in the legend have been applied.

Comment:

Please include this additional reference in your legend. You presently only reference "Parcels located outside of the sphere of influence" and "County Parcels within the RUL".

4/9

4. STATEMENT

APPENDIX E

Page3.3-7Table 3.3-3 "Future Roadway Improvements"

Page 3.3-6 3rd paragraph Line 9 "The results of this analysis were used to identify improvements projects that may be necessary over the next 25 years to maintain the level of service standards established in the proposed General Plan."

53.4E

Comment:

Each housing development that occurs in the North Jefferson Study Area is charged a North Jefferson Street Improvement Fee. This fee was established after a project EIR and traffic study was done in the area. The study concluded that 4 street improvements were needed in order to reduce the significant adverse impacts on the existing street system when additional development occurs. One of these improvements has been completed (the extension of Jefferson St. from Trower Ave. to Salvador Ave.) the other 3 have not. Why aren't they included on Page 3.3-7Table 3.3-3 "Future Roadway Improvements" ?

5. STATEMENT

Page 40 Response Document 11.2E - 2nd paragraph - "The 75,000 population was used in the 1970's for planning to the year 2000. Population data over the last 20 years show that the contained growth policies adopted with the 1975 plan were effective in limiting population growth; current projections anticipate a population of 72,250 by the year 2000 (2,750 less than the voter recommended limit for 2000)."

Comment:

53.5G

This statement refers to the November 6, 1973 advisory ballot measure (known as the "Plebiscite")in which Napa voters were asked 12 questions. One questions was "The City of Napa now has a population of 40,000 people. If the City is to grow, what do you think would be a size city you would like Napa to become?" Voters were given 4 choices and overwhelmingly chose a population of 75,000 which was the lowest population on the ballot. No where in this question, or the other questions in this ballot did the year 2000 appear. The voters did not recommend a population of 75,000 to the year 2,000 therefore I am asking that you remove the above words that I have underlined and which are in parenthesis as they are misleading and historically incorrect.

My source of reference is a copy I have of the November 6, 1973 Plebiscite ballot with the results of all 12 measures that appeared on this ballot. This ballot and all the figures were obtained from the Napa City Clerk's office.

Louise Clerici

60

NAPA COUNTY OFFICE OF COUNTY COUNSEL

1195 THIRD STREET, ROOM 301, NAPA, CALIFORNIA 94559
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MARGARET L. WOODBURY, Chief Deputy
JOSEPH C. FOLKARD, Deputy
JAYNE F. HERMAN, Deputy
CAROL VICTOR, Deputy
SILVA DARBINIAN, Deputy
PATRICIA TYRRELL, Deputy
CLAY JACKSON, Deputy

January 21, 1998

Our File Nos. 7700.071

GENERAL PLAN COMMUNICATION # 54



John Yost, Planning Director
Attn: Deborah Faaborg, General Plan Project Coordinator
1600 First Street
Napa, CA 94559

Re: *Comments of the County of Napa: City of Napa General Plan and EIR*

Dear Mr. Yost:

You will find enclosed the comments of the County of Napa regarding the revised draft EIR the City of Napa has prepared in conjunction with its proposed General Plan update. Unfortunately, and as you will see from the enclosed comments, the County believes that the revised Draft EIR and accompanying documents continue to be inadequate as a matter of law and will need to be revised and re-circulated.

54.1 E

One other point needs to be made here. Unfortunately, the CMA did not receive a copy of the documents and thus it was not possible for the County to discuss the traffic responses contained in the EIR with CMA staff prior to preparing its responses. This failure renders the entire review process defective as a matter of law and requires that the comment period be extended not only for the County of Napa but for the CMA as well. Because of the manner in which the CMA now responds to comments, it is the position of the County that an extension of not less than 3 weeks is required to enable CMA to respond and to enable the County to discuss its traffic concerns with the CMA prior to reviewing the enclosed comments and adjusting same if necessary.

Notwithstanding the above, the County appreciates the opportunity to comment on this very important document which has major adverse implications for long standing City/County cooperative land use efforts. The County remains convinced

51

that a General Plan revision, accompanied with a legally adequate EIR, that continues that cooperative land use efforts of the two jurisdictions and still meets the needs of the City of Napa is possible.

Very truly yours,

ROBERT WESTMEYER
County Counsel

JEFFREY REDDING
Director, Conservation, Development and Planning

cc\d\pl\aiasp\yost4.doc

APPENDIX E

COMMENTS OF THE COUNTY OF NAPA (REVISED):

CITY OF NAPA GENERAL PLAN UPDATE

DRAFT ENVIRONMENTAL IMPACT REPORT

Wednesday, January 21, 1998

53

The County of Napa submits the following comments regarding the revised draft Environmental Impact Report (hereafter "DEIR") relating to the General Plan Update of the City of Napa.

The Director of the Conservation, Development and Planning Department will be filing separate comments regarding the planning implications of the proposed changes to the City's General Plan.

In addition to these comments, the County reserves the right to file additional comments regarding the merits, or lack thereof, of the General Plan update as the hearings on same progress.

I. SUMMARY.

The City of Napa has proposed amending its General Plan and has prepared a revised revised DEIR for the purpose of evaluating the environmental effects that would logically flow from the amended General Plan. Unfortunately, the revised revised DEIR the City has prepared is inadequate in a number of respects and as a consequence fails to properly evaluate the environmental effects of the proposed General Plan Amendments.

The major shortcomings of the revised DEIR include the following:

1. **FAILURE TO ADEQUATELY DISCUSS THE REGIONAL SETTING OF THE PROJECT.** The California Environmental Quality Act (hereafter "CEQA") requires a revised DEIR to describe not only the local setting of the project but also the regional setting in which the project is located. The revised EIR continues to lack sufficient discussion of regional issues to meet the requirements of CEQA. 54.2 E

2. **THE REVISED DEIR FAILS TO RECOGNIZE /EVALUATE THE REGIONAL EFFECTS THE PROJECT WILL CAUSE.** An EIR cannot be considered adequate if it fails to evaluate the effect development within the City will have on the region. The evaluation of the regional effects the General Plan Amendments will have, particularly in the areas of air quality, water supply, wastewater treatment, growth induction and traffic, is inadequate. 54.3 E

3. **THE REVISED DEIR'S TRAFFIC ANALYSIS IS INADEQUATE.** There is no meaningful discussion of the impact the Stanly Ranch development will have on the intersection immediately adjacent to the Stanly Ranch or other highways Stanly Ranch inhabitants would logically utilize. 54.4 E

4. **THE REVISED DEIR'S CONCLUSION THAT ALL TRAFFIC IMPACTS HAVE BEEN MITIGATED TO AN INSIGNIFICANT LEVEL IS INCONSISTENT WITH THE ANALYSIS CONTAINED IN THE REVISED DEIR.** The revised DEIR identifies a number of traffic intersections where it 54.5 E

54.5 E

concedes the traffic will continue to operate at LOS F, which the revised DEIR defines as a significant effect, while at the same time concluding that all traffic impacts have been mitigated to insignificant levels. This despite the fact that its 2020 cumulative numbers differ significantly from those of the CMA. The revised DEIR needs to be redrafted and recirculated to resolve this inconsistency.

54.6 E

5. THE REVISED DEIR'S SEWAGE ANALYSIS IS INADEQUATE. The revised DEIR fails to demonstrate how sewage treatment for the new development which is facilitated by the proposed General Plan changes will be provided. CEQA does not permit such deficiencies to be mitigated simply by including a provision that building permits will not be issued in the event of a lack of sewer capacity. Additionally, the EIR concedes that the proposed Airport Industrial Area Specific Plan ("AIASP") amendments have not been analyzed which is required by CEQA since the revised AIASP is a reasonably foreseeable project.

54.7 E

6. THE CUMULATIVE ENVIRONMENTAL EFFECTS OF REASONABLY FORESEEABLE DEVELOPMENTS ARE NOT ANALYZED. The proposed General Plan changes the designation of the Stanly Ranch from a "Special Studies Zone" to intense residential development. It accommodates the creation of 600 new homes (an estimated 1,400 new residents) as well as a resort hotel and various other traffic generating commercial facilities. Yet there is no meaningful discussion of the impact such a development would cause in the revised DEIR. Nor is there a discussion of other pending and reasonably foreseeable projects such as the specific developments occurring within the Airport Industrial Area, the Lucky Supermarket or the buildout of the remainder of the South Napa Marketplace Shopping Center.

54.8 E

7. GROWTH INDUCEMENT. The proposed amendments of the General Plan would accommodate the development of the Stanly Ranch as well as agricultural property east of Big Ranch Road. Both of these changes are growth inducing and yet there is no analysis of the growth inducing implications the buildout of these developments will have on the existing environment or long standing County General Plan policies that protect agriculture and open space.

54.9 E

8. *CONFLICTS WITH ADOPTED ENVIRONMENTAL PLANS AND GOALS.* The City of Napa is proposing for the first time to bring within its Sphere of Influence (hereafter "SOI") and Rural Urban Limit Line (hereafter "RUL") agricultural lands that are presently located within the County's Agricultural Preserve. Although the amount of lands being so included is small in comparison to the amount of land already within the City of Napa's SOI and RUL, the implications of this change are huge for the County's agricultural community, represents a radical shift in the policy of the City, and is inconsistent with the fundamental Goals and Policies of the Napa County General Plan. The fact that there is no environmental analysis of this issue, as there must be, renders the

revised DEIR inadequate as a matter of law. The fact that the City and County General Plans might ultimately be inconsistent is a disingenuous comment since the environmental effects of such a change must be discussed; whether the General Plans are consistent or inconsistent.

Notwithstanding the comments of the City of Napa to the contrary in its Response Document, the revised draft EIR documents continue to concede that the long standing practice of the City of Napa is to provide housing for individuals that wish to live in southern Napa County, including housing for workers in the unincorporated area. In its ongoing comments regarding the County of Napa's proposed amendments to the AIASP the City has indicated it may no longer be willing to provide such housing in the future. Such a result may result in the County considering providing additional housing in the those areas of the County presently designated as 'urban' and adjacent to the Cities of Napa and American Canyon as a result of the buildout of the AIASP. If additional housing is required, this necessarily will eliminate the open space nature of those lands and constitute a major change in the adopted environmental plans and goals of the City and County of Napa that have been in place for many years.

54.9 E

9. <u>ALTERNATIVES ANALYSIS.</u> There is a lack of alternatives included in the revised DEIR. Specifically, there is no alternative proposed that contemplates not bringing the lands designated as AW/AP on the Napa County General Plan within the City's Sphere of Influence. Nor, as LAFCO has suggested, has the alternative of de–annexing the Stanly Ranch been considered even though the Ranch is not currently within LAFCO's adopted Sphere of Influence for the City of Napa. The position of the City that leaving the Stanly Ranch within the City but not changing its designation from a "study area" is substantively the same as a de-annexation alternative simply cannot withstand critical analysis. These are reasonable alternatives to the proposal which must be included in the alternatives analysis.

54.10 E

10. <u>FAILURE TO ANALYZE THE STANLY RANCH DEVELOPMENT.</u> The failure to analyze the Stanly Ranch development in any meaningful way renders the various elements of the revised DEIR defective. In particular, this failure makes it likely that the revised DEIR has failed to adequately address the Visual Quality, Biological Resources, Water and Public Health, Growth Inducement and Safety elements of the revised DEIR. The failure of the revised DEIR to do so renders it inadequate as a matter of law.

54.11 E

II. DETAILED DISCUSSION OF THE REVISED DEIR INADEQUACIES

A. PROJECT DESCRIPTION.

CEQA requires that a DEIR include a project description that adequately describes the environment in the vicinity of the project as it exists prior to the commencement of the project from both a local and regional perspective. The description must be sufficiently detailed to enable an individual who reads the DEIR to be able to understand the significant effects of the proposed project on not only the locality but also on the region. 14 Cal.Adm.Code 15125. It also must discuss the inconsistencies between the City General Plan and the County General Plan as well as regional plans. Finally, the response to comments must be specific. Conclusionary statements unsupported by factual information is inadequate as a matter of law. Thus, the City's response which merely references the EIR and argues that somewhere within the EIR an adequate description of the regional setting exists is not sufficient.

54.12 E

As the County has previously observed, Table 1–1 of the revised DEIR indicates that the regional setting description is contained the Draft General Plan document (Chapter 1: 'Napa General Plan Context' & 'Environmental Constraints') and in the Background Report. The 'Napa General Plan Context' discussion amounts to a brief historical discussion of job projections in the region. The regional environmental setting is ignored. Nor does the "Environmental Constraints" discussion contain any meaningful discussion of regional issues despite the reference in the Draft EIR to that portion of the draft General Plan. Finally, the Background Report contains no meaningful discussion of the existing regional environmental setting particularly in regard to the regions present lack of sewage capacity, water availability to 2012, and the existing traffic situation. The revised DEIR reference to the Background Report also fails to identify precisely where in the Background Report regional issues are discussed. Such specific and detailed references are mandatory if a DEIR is to be deemed adequate. 14 Cal.Adm. Code 15122.

For the above reasons the County contends that the description of the regional setting continues to be inadequate and those portions of the revised DEIR need to be rewritten to comply with the law.

B. REGIONAL EFFECTS NOT ADDRESSED OR INADEQUATELY ANALYZED.

The County is concerned about the enormous traffic impacts of the developments projected by the draft General Plan, particularly the traffic impacts caused by the Stanly Ranch and Big Ranch Road developments and the failure of the City of Napa to address the impact those projects will have on the SR29/12 intersection. The County is also concerned that although the City's traffic study included the SR29/221 and SR29/121 intersections no mitigation measures, including but not limited to roadway construction, were proposed for the SR29/221 (or SR29/12) intersections. Ironically, while the City argues that significant traffic outside the city will not occur solely due to the proposed city developments (Response Document, p. 31) is simultaneously argues that even Phase II/II sewage increases may not be able to accommodate the increased sewage needs. If the City chooses to argue that none of the new development will cause appreciable traffic trips out of town, it needs to provide documentation to support such a novel proposition (see discussion below on this point). In short, and as was the case in the original EIR, the City's view continues to be that its responsibility ends at the City limits. Such an approach violates CEQA which requires a local agency to carefully review the regional impacts its projects will have and either provide a reasonable level of mitigation or concede that a significant environmental effect remains, no mitigation measures are feasible that would further reduce the impact, and adopt overriding findings.

54.13 E

The proposed changes to the City of Napa's General Plan contemplates including 440± acres within the City's Rural Urban Limit Line (hereafter "RUL"). 53 of those acres represent agricultural lands that have not previously been within the City's Sphere of Influence (hereafter "SOI"). It also will authorize extensive development in the Big Ranch Road area and the Stanly Ranch area. In the Big Ranch Road area an unspecified number of additional homes are expected to be built. In the Stanly Ranch planning area the development involves 550–600 new residential units, a destination resort comprising 300 lodging units, with conference, meeting room and related facilities, an 18–hole golf course and clubhouse, a commercial wine center, a small winery and a boat dock providing public access to the Napa River. When development

in other areas of the City are taken into account the proposed changes to the City of Napa's General Plan contemplates developing a grand total of 7,840 new homes.

Notwithstanding the above described protestations to the contrary by the City of Napa, such changes will clearly have an adverse effect on traffic, not only within the City of Napa, but also on the various State and local highways leading to the City of Napa. Despite this fact, the revised DEIR contains only a superficial discussion of the regional impact such development would cause on most State Highways and provides no analysis of the effect such development would have on the SR29/12 intersection. That a revised DEIR to be adequate is required to analyze the effect a project will have on major highways within a reasonable distance of the project is clear. *A Local & Regional Monitor v. City of Los Angeles* (1993) 12 Cal.App.4th 1773, 1785.

54.13E

Although there is no analysis performed by the City evaluating the impacts this scope of development would have on SR29/12 some rough estimates can be made. For example, since 40% of the individuals occupying those 7,840 homes will commute to out of county jobs[1] these changes to the General Plan will result in the PM Peak trips increasing by approximately 3,000 trips per day. The resort hotel, golf course and Boat Dock presumably would add several thousand additional PM peak trips per day.[2] The current LOS for the SR29/121, SR29/221 and SR29/12 intersections has been estimated by the Congestion Management Agency as LOS D.

Although the revised DEIR fails to analyze the situation, is seems likely that these additional PM peak trips per day will cause the LOS at all of these intersections to degrade to F. Thus, it seems likely that when the development authorized by the

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[1] The Background Report (at p. 1–38) indicates that in excess of 40% of city workers commute to out of county jobs. Clearly the majority of these individuals will commute south thereby impacting the SR29/121, SR29/221 and SR29/12 intersections. In light of these data contained in the DEIR, how the City can persuasively argue that the new development will not impact regional highways significantly is unclear.

[2] The Final EIR involving the Gasser Estate Project projected that the Napa Resort Hotel would have generated approximately 4,673 total trips per day (Page 5–15). Although the revised DEIR needs to analyze the Stanly Ranch Resort Hotel situation, and is inadequate for not having done so, the County assumes the trip generations by any resort hotel would be similar.

proposed amendments to the General Plan of the City of Napa are accomplished the traffic will revert to LOS F solely as a result of City development. The recent study performed by Dowling & Associates for the AIASP validates this conclusion. That study indicates that SR29/121, SR29/221 and SR29/12 intersections are already at LOS E or F.[3] Thus, under either analysis, the additional development proposed by the City of Napa in its revised General Plan will significantly aggravate an already unacceptable LOS.

In sum, all of these developments will significantly impact the regional traffic patterns in the Airport Industrial Area. The revised DEIR is inadequate as a matter of law for failing to discuss this environmental impact and doubly inadequate for failing to propose feasible mitigation measures or concede there are no feasible mitigation measures and adopt overriding findings. The revised DEIR needs to be revised again and recirculated with specific mitigation measures included that will commit the City of Napa to provide its fair share of the costs of traffic improvements at all three intersections necessitated by its development.

54.13 E

Finally, it seems clear from a review of the various documents relating to the revised DEIR that inconsistent traffic projections were utilized in some instances (see Response Document, response #10.1G, p. 35). While the response indicates that the aggregate differential is roughly equivalent, it does not necessarily follow that all localized areas would be impacted the same. In fact there could be wide fluctuations in the land use scenarios. These possible differentials need to be analyzed.

C. THE SEWAGE ANALYSIS IS DEFICIENT.

The County previously has commented that it was concerned that the Stanly Ranch and Big Ranch Road developments in particular will have a major impact on the ability of the Napa Sanitation District (hereafter "NSD") to provide adequate levels of service and treatment to the Airport Industrial Area and yet there was no analysis of this issue anywhere in the revised DEIR or accompanying documents. The comments of the NSD

54.14 E

[3] Appendix B: Traffic Calculations; SR29/121 (LOS E) , SR29/221 (LOS F) and SR29/12 (LOS F)

regarding the revised DEIR concurred with the County's view.[4] In the revised EIR the City of Napa concedes the NSD does not have the capacity to serve the additional development contemplated by the revised General Plan at the present time and may not have capacity to serve such development even after the planned NSD facilities are completed (p. 17 of the City's response to comments). The City's response is to amend the General Plan to require as a mitigation measure that where a "critical capacity" situation exists, a term that is not defined as far as can be determined, no building or other ministerial permit will be issued until the NSD has provided a "will serve" letter (Addenda #7; revision of Policy CS-10.3). Unfortunately, this approach is not permitted in circumstances, such as exist in the case of the Stanly Ranch and Big Ranch Road projects, where the exact project and virtually all of the proposed developments within the project area are known. *Stanislaus National Heritage Project v. County of Stanislaus* (1996) 48 Cal. App.4th 182. The *Stanislaus* case judicially validates the County's view of CEQA that discussion of the environmental effects of increasing the sewage capacity of the NSD must be included within the EIR so that the City Council will be in a position to make an informed judgment regarding whether or not the General Plan should be amended to accommodate the projects that will need the sewage capacity. This being the case, it is clear that the revised DEIR needs to be rewritten to discuss in detail the existing sewage capacity of the NSD, whether or not Phases II/III of the Sewage Treatment Master Plan is feasible, and the environmental effects of implementing those phases. It also needs to discuss whether the projected revenue stream of the NSD in 2012 will be capable of financing the Phase III Sewage Treatment Master Plan since Phase II will only permit the NSD to serve through the year 2012 and the General Plan update is intended to operate through the year 2020. Finally, the analysis needs to discuss the effect the passage of Proposition 218 will have on the ability of the NSD to finance Phase II/III improvements to the extent the existing revenue stream will not support financing the improvements. The County recognizes that this discussion will involve to some extent forecasting. However, because the Stanly Ranch and Big Ranch Road specific plans unquestionably and

54.14 E

[4] See comments 19–22 of the NSD comment letter to Deborrah Faaborg dated November 14, 1996.

admittedly contemplate the supply of sewage to large development projects, the City must "attempt in good faith to fulfill its obligation under CEQA to provide sufficient meaningful information regarding the types of activities and environmental effects that are reasonably foreseeable" from that supplying of sewage. See *Laurel Heights Improvement Assn v. Regents of University of California* (1988) 47 Cal.3d 376. The fact that the NSD is not under the jurisdiction of the City of Napa does not matter. The City is capable of, and should, evaluate the environmental effects of the sewage plant expansions. Without such an analysis, the EIR fails as an informational document and the General Plan amendments cannot go forward. 54.14 E

The County concedes that it might be possible to provide in the general plan that applications for specific developments such as specific plans, use permits, tentative subdivision maps and the like cannot be filed or processed until adequate sewage is available as a mitigation measure. Such a change would, of course, require a redraft and re-circulation of the revised DEIR. It follows from the above that allowing all development permits to be approved, save ministerial permits which require no environmental review, cannot by definition be a mitigation measure.

D. <u>CUMULATIVE IMPACTS.</u>

The County has reviewed the cumulative impact analysis of the revised draft EIR and finds that basically no changes have been made to achieve compliance with §15130 of the CEQA State Guidelines. Thus, the County repeats its previous comment that this failure renders the revised DEIR's analysis of cumulative impacts is inadequate as a matter of law. *San Franciscans For Reasonable Growth v. City and County of San* Francisco (1984) 151 Cal.App.3d 61. The County further re-emphasizes its previous comments that what little analysis exists is overly abstract. There is no meaningful discussion of the cumulative impacts that reasonably foreseeable future projects in the City of Napa such as the Stanly Ranch and Big Ranch Road developments will have on the environment. Nor is there any discussion whatsoever of projects that are presently occurring within the AIASP area even though the City of 54.15 E

54.15 E

Napa was fully aware of such projects.[5] Such failure, as the City of Napa has phrased it in its comments on the revised DEIR involving the AIASP, "renders the impact analysis invalid, abstract and shrouds the concrete impacts the development within the City will actually cause." Relying on abstract and high conceptual reports, such as ABAG reports, as justification that further cumulative impact analysis is not required is insufficient as a matter of law.

E. GROWTH INDUCEMENT.

No changes have been made to the portion of the revised EIR dealing with growth inducement and thus the County's previous comments are restated here without substantive change for ease of reference:

54.16 E

"The DEIR fails to recognize the growth inducing aspects of the proposed draft General Plan. The Stanly Ranch is presently serviced with no sewage infrastructure and minimal infrastructure providing a water supply to the area. Notwithstanding this fact, the growth inducement aspects of providing the needed infrastructure is not discussed anywhere in the DEIR or accompanying documents. More importantly, the development of the Stanly Ranch will result in the virtual enclosure of 800± acres of agricultural/open space lands. The pressure to develop this property once the Stanley Ranch is developed will be enormous. Additionally, the pressure to urbanize additional lands outside this 800± acres but which are immediately to the north of the Stanly Ranch would also be intense because adding that land will "round out" the City boundaries in that particular area of the City.

In the Big Ranch Road area, the draft General Plan proposes for the first time to include within its Sphere of Influence lands on the east side of Big Ranch Road. Big Ranch Road has always been considered an agricultural "dividing line" identifying and limiting the City limits. Once this line is breached the pressure

[5] In its comments to the revised DEIR involving the AIASP the City argued that there were numerous projects that allegedly were not adequately analyzed including the WIG Resort Hotel and the Windmill Inns of America project. The City cannot argue that the County revised DEIR should address these projects but the City revised DEIR is not required to do so.

to increase the City Limits to the Napa River will be intense. Only in this case the acreage that will be subjected to development pressures involves thousands rather than hundreds of acres.

The failure of the DEIR to discuss the growth inducing aspects of these matters renders the DEIR inadequate as a matter of law. This is particularly the case in a policy documents such as the General Plan where growth inducement is always a serious and significant factor. The inadequacy of this element of the DEIR requires that it be withdrawn, redrafted and recirculated."

The conclusionary statement that the City disagrees that development of the Stanly Ranch will be growth inducing is inadequate as a matter of law. ("the lead agency must explain in detail its reasons for rejecting suggestions . . . There must be good faith, reasoned analysis in response to the comments received. Conclusory statements unsupported by factual information will not suffice . . . the final EIR will almost always contain information that has not been included in the draft EIR" *Laurel Heights Improvement Assn v. Regents of University of California* (1988) 47 Cal.3d 376). Simply indicating that the RUL will somehow avoid growth inducement is not sufficient. 54.16 E

In short the County believes that if the draft EIR is to be the informational document the law requires, it must recognize and analyze the growth inducing impacts these general plan amendments will cause so that the City Council will be in a position to evaluate whether or not the changes are appropriate. In addition to the impacts identified in the above quoted previous comments, the County believes the pressure the Stanly Ranch development will place on the remaining agricultural/open space lands south of the Stanly Ranch, east of the Napa River and north of the AIASP areas must be discussed before the revised DEIR will be sufficient as a matter of law.

F. ***CONFLICTS WITH ADOPTED ENVIRONMENTAL PLANS AND GOALS.*** 54.17 E

Appendix G of the State Environmental Guidelines provides that a project will normally have a significant effect on the environment if it will conflict with adopted

environmental plans and goals of the community in which it is located. The Napa County General Plan has long provided that agricultural lands should be protected and not urbanized. Thus Goal #1 of the Napa County General Plan provides that the purpose of the general plan is to plan for agriculture and related activities as the primary land uses in Napa County and concentrate urban uses in the County's existing cities and urban areas. Goal #6 provides that the General Plan is intended to ensure the long term protection and integrity of those areas identified in the general plan as agriculture and open space. The County and the City have adopted general plan policies supporting this concept.

54.17E The proposed draft General Plan amendments, on the other hand, now proposes to begin the process of ultimately annexing agricultural lands into the City of Napa which conflicts with the above adopted environmental plans and goals of both jurisdictions. This by definition amounts to a significant environmental effect which has not been discussed or mitigated. The revised DEIR needs to be revised to identify this change by the City as a significant environmental effect and propose feasible mitigation measures to deal with the effect or adopt overriding findings.

Similarly, the City of Napa in its comments regarding the revised DEIR that has been prepared for the AIASP has indicated it may be abandoning its long standing policy of providing housing within the City of Napa, to the extent required, for individuals that are working in the unincorporated area. If this is the case, the portions of the revised DEIR that indicate to the contrary needs to be revised and an analysis of the effect this change in long standing city/county policy to protect the environment will have.

F. AIR QUALITY.

54.18E Due to the fact that the traffic measures are not properly analyzed, the air quality issues are also improperly analyzed. The County believes that once the traffic analysis is completed in a satisfactory manner it will demonstrate that a significant effect on air quality exists which must be resolved through appropriate mitigation

measures. Unfortunately, it is not possible for the County to comment on the air quality problems until a revised traffic analysis is completed. 54.18E

G. ALTERNATIVES ANALYSIS. As the County noted in its previous comments, there is no alternative proposed that contemplates not bringing the lands designated as AW/AP on the Napa County General Plan within the City's Sphere of Influence. Nor, as LAFCO has suggested, has the alternative of de–annexing the Stanly Ranch been considered even though the Ranch is not currently within LAFCO's adopted Sphere of Influence of the City of Napa. The position of the City that leaving the Stanly Ranch within the City as a study area is substantively the same as a de-annexation alternative simply cannot withstand a reasoned analysis. It is fundamental that should de-annexation occur, LAFCO approval must again be secured prior to developing the property in the City of Napa. On the other hand, if the property becomes Open Space/Agricultural lands as a result of the de-annexation, a vote of the people would be required prior to those lands being developed in the County at an urban level. 54.19E

Thus, the LAFCO proposals are reasonable alternatives to the proposal which the County believes must be included in the alternatives analysis if the EIR is to be legally sufficient.

H. MISCELLANEOUS.

The revised DEIR fails to discuss meaningfully the Napa County General Plan and the extent to which the draft City General Plan is inconsistent with the County General Plan. This failure violates the State Environmental Guidelines. See 14 Cal.Adm.Code 15125(b) 54.20E

As noted previously, the failure to address at all the environmental effects of developing the Stanly Ranch renders the entire revised DEIR inadequate as a matter of law.

APPENDIX
Intersection Level of Service - WITHOUT CMP EXCLUSIONS

Node Number and Intersection	-- 1992 --			-- 2000 --			-- 2010 --			-- 2020 --		
	LOS	del	V/C	LOS	del	V/C	LOS	del	V/C	LOS	del	V/C
#1048 Salvador Ave at SR 29	B	7.0	0.579	B	6.8	0.566	B	7.3	0.648	B	8.1	0.733
#1075 Wine Country Ave at SR 29	B	7.3	0.707	B	7.2	0.689	B	8.2	0.784	B	10.5	0.846
#1130 Trower Ave at SR 29	D	30.1	0.976	D	28.9	0.968	F	106.9	1.129	F	226.6	1.285
#1226 Trancas St at SR 29	F	90.0	1.098	F	88.2	1.094	A	2.4	0.226	A	2.6	0.240
#1228 Trancas St at California Blvd	A	3.0	0.003	A	3.0	0.003	A	1.7	0.355	A	1.7	0.427
#1234 Trancas St at Jefferson St	C	19.1	0.512	C	19.3	0.523	C	18.5	0.569	C	20.2	0.654
#1238 Trancas St at Villa Lane	B	7.2	0.421	B	7.3	0.418	B	7.5	0.519	B	9.0	0.619
#1242 Trancas St at Big Ranch Rd	B	14.1	0.610	B	13.9	0.596	B	14.7	0.593	C	15.2	0.683
#1246 Trancas St at Soscol Ave	B	14.4	0.669	B	14.3	0.665	B	12.3	0.504	B	12.5	0.531
#1330 Pueblo Ave at Jefferson St	C	16.9	0.575	C	17.1	0.581	C	16.0	0.549	C	18.1	0.633
#1452 First St at California Blvd	C	24.5	0.912	C	23.7	0.887	E	46.3	1.048	E	56.8	1.079
#1458 Lincoln Ave at California Blvd	C	20.4	0.812	C	19.6	0.796	C	20.4	0.836	D	29.3	0.919
#1480 Lincoln Ave at Jefferson St	C	17.2	0.761	C	17.1	0.756	C	18.2	0.751	C	20.3	0.866
#1506 First St at Jefferson St	B	13.5	0.658	B	13.5	0.658	B	14.7	0.744	C	15.9	0.811
#1540 Lincoln Ave at Soscol Ave	C	23.9	0.952	C	22.4	0.934	E	53.5	1.092	F	96.4	1.209
#1552 First St at Soscol Ave	B	11.4	0.628	B	11.4	0.614	B	12.6	0.708	B	14.5	0.784
#1566 Lincoln Ave at Silverado Trail	B	12.4	0.491	B	12.6	0.491	B	14.9	0.535	B	13.2	0.763
#1580 First St at Silverado Trail	B	7.8	0.554	B	7.9	0.567	B	8.7	0.655	B	10.6	0.743
#1644 Second St at Jefferson St	B	9.3	0.424	B	9.0	0.434	B	9.7	0.514	B	10.0	0.591
#1646 Third St at Jefferson St	B	12.6	0.424	B	12.5	0.419	B	13.1	0.501	B	13.2	0.557
#1684 Second St at Main St	B	7.2	0.366	B	7.2	0.366	B	7.3	0.400	B	7.6	0.488
#1686 Third St at Main St	B	9.0	0.638	B	8.7	0.582	B	9.1	0.681	D	25.2	0.998
#1688 Third St at Soscol Ave	C	15.6	0.659	B	14.7	0.599	C	17.3	0.727	C	22.8	0.890
#1702 Third St at Silverado Trail	C	22.3	0.946	C	17.2	0.880	C	22.9	0.953	E	58.3	1.140
#1838 Soscol Ave at Silverado Trail	F	78.8	1.140	C	19.1	0.736	B	8.5	0.046	B	7.4	0.067
#1906 Imola Ave at South Jefferson S	C	15.5	0.554	C	15.7	0.607	C	18.9	0.771	C	19.6	0.825
#1918 Imola Ave at South Coombs St	D	31.6	0.963	E	43.3	1.042	F	86.5	1.191	F	146.4	1.325
#1922 Soscol Ave at Kansas Ave	F	xxxxx	0.000	F	xxxxx	0.000	F	142.8	1.254	F	OVRFL	1.995
#1926 Soscol Ave at Imola Ave	D	38.8	1.022	D	36.1	1.017	E	56.7	1.109	F	129.4	1.288
#2034 SR 121 at SR 29	F	67.4	1.193	F	67.4	1.193	F	199.5	1.462	F	525.5	1.771
#2062 SR 221 at SR 29	F	OVRFL	2.879	F	OVRFL	2.879	F	OVRFL	3.518	F	OVRFL	5.571
#1012 Oak Knoll & SR 29	B	7.4	0.479	B	7.7	0.499	B	8.2	0.666	B	8.5	0.715
#4320 Madison & SR 29	B	6.7	0.672	B	8.1	0.687	B	9.0	0.699	B	9.9	0.734
#4321 SR 29 & Adams	B	11.7	0.730	B	11.7	0.730	OC	xxxxx	1.099	OC	xxxxx	1.294
#4372 SR 12 Kelly	F	267.0	1.515	F	267.0	1.515	F	481.2	1.684	F	OVRFL	1.793
#4373 SR 29 & SR 12	F	496.0	1.662	F	496.0	1.662	F	830.7	1.894	F	OVRFL	2.115
#4864 SR 29 & Rio Del Mar	A	4.4	0.696	A	4.4	0.696	B	7.0	0.824	B	11.2	0.944
#4897 SR 29 & Pope	B	11.3	0.711	B	11.3	0.711	OC	xxxxx	1.040	OC	xxxxx	1.188
#4916 SR 29 & American Canyon	C	21.6	0.893	C	21.7	0.895	E	47.0	1.075	F	117.9	1.260

OC = Over Capacity. Delay cannot be calculated.

GENERAL PLAN COMMUNICATION # 55

NAPA COUNTY

CONSERVATION • DEVELOPMENT and PLANNING DEPARTMENT

Jeffrey Redding
Director

1195 Third Street, Room 210 • Napa, California 94559-3092
Telephone 707/253-4416 FAX 707/253-4336



January 21, 1998

John Yost, Planning Director
City of Napa
1600 First Street
Napa, CA 94559-0660

Re: Comments on City of Napa General Plan (December 8, 1997 Addenda 1-9) and Response to Comments on 10/1/96 Draft environmental Impact Report

Dear John:

The Department has completed its review of the documents listed above. Our review focused on the intent to which these documents responded to the comments we submitted on March 15, 1994, and November 15 and 21, 1996. I want to commend you on the format of your responses; the use of the addenda makes it very easy for the reader to review the document and determine if their comments have been addressed.

After examining the documents, we offer the following comments:

55.1 G

RUL Expansion

While we continue to strongly support the City's retention of an RUL as the centerpiece of its General Plan and its update, we nevertheless repeat our concern with the City's expansion of the RUL in the area of the State Hospital and at the northeast corner of Big Ranch Road and Trancas Avenue. We first expressed this concern in a letter to the mayor in March, 1994. We don't believe that the City's response, either from an environmental impact assessment point of view or from a planning framework, is adequate. The response by the City's consultant (@ page six) misses the key issue. The issue isn't whether or not the State Hospital property is prime agricultural land. The fact that the soils on the State Hospital property may not be prime soils is exactly the reason the County remains concerned about the City's proposal to expand its sphere of influence to encompass more of the State Hospital property. The State Hospital is designated as "urban" on the County Land Use Diagram (Figure 14). As such, it is one of few underdeveloped urban pieces of property under County jurisdiction where urban uses, such as housing may be provided.

2a

In fact, as the City is well aware, use of designated urban parcels along the Highway 221 corridor for housing is one of the key options being evaluated as part of the Airport Industrial Area Specific Plan update. This option responds directly to comments raised by the City of Napa that the County must accommodate and plan for housing that results from future job growth in the Airport study area. To remove additional urban areas from County jurisdiction in the absence of a commitment to accommodate future housing necessitated by job growth in the airport area within existing cities puts pressure on prime and other agricultural lands to accommodate housing. This prospect that is contrary to good planning, the County general plan and the long-standing goals of the City general plan. In addition, we believe it contrary to the wishes off 61% of city voters who voted for Measure 'J' in 1990.

55.1 G

With regard to the 40 acres of land at the northeast corner of Big Ranch Road and Trancas Avenue, again the consultant has dismissed the County's long standing objection with a conclusion that because the land is not classified as prime (i.e. Class I soils) that urbanization of the parcel is of little, if any, consequence. I would suggest that such a conclusion flies in the face of recent history in the Carneros region where world class quality grapes are grown on soils that the same governmental agency quoted in your response concluded were not prime soils. In addition, the parcel in question is designated AP (Agricultural Preserve) and therefore its annexation is contrary to long standing LAFCOM policy.

55.2 E

We therefore, strongly request that the City revise Figure 1-1 in Addenda #1 and in other similar documents to ensure that these two areas of county jurisdiction remain so in the City's General Plan update.

Greenbelt Designation (Addendum #2)

We appreciate the City clarifying that the "G" designation is intended to be applied only to County lands designated AWOS or AP and not those lands which may be in proximity that are designated "urban" by the County General Plan (response 28.3G @ page 76). We would continue to urge the City to include within its General Plan a commitment, including the adoption of an appropriate funding mechanism, to work with the County and the City of American Canyon to establish permanent community separators between the jurisdictions.

55.3 G

Waste Water Treatment Capacity(Addendum #7)

As the Response document and Addenda #7 points out, the status of improvements and expansions to exiting sewage treatment plants are in the planning stages and, until completed, existing facilities are inadequate to handle future growth, from the Big Ranch Road Specific Plan and Stanly Ranch areas (Response to Comments @ page 17). The Response includes mitigation measures to address this impact. We believe that approval of discretionary projects, but withholding ministerial building permits, in the face of an

55.4 E

inadequate sewage treatment system is not sufficient mitigation. And, the Final EIR must conclude that the impact on the sewage treatment facility is a significant impact that cannot be mitigated through adoption of feasible mitigation measures. Approval of the General Plan, despite this impact, must include the adoption of overriding findings pursuant to CEQA. 55 E

Miscellaneous Comments

Although dismissed out of hand by Response document (for example, @ page 43), we would continue to urge the city to include in its General Plan and EIR, a commitment to adopt a traffic mitigation program to fund improvements within the unincorporated areas to ensure that those improvements will be in place to serve those travelers bound for destinations within the City limits. Finally, we continue to urge the City to include in its General Plan and EIR a commitment to adopt a housing in-lieu fee program as suggested in Response to Comment (12.6G @ page 44). 55. G 55. G

Thank you for this opportunity to review and comment on these two documents.

Sincerely,

Jeffrey Redding

Jeffrey Redding
Director

FENKEN REALTY INC.

Post Office Box 3299 • Napa, California 8

(707) 252-8666

January 20, 1998

John Yost
Planning Director
City of Napa
1600 First Street
Napa, CA 94559

GENERAL PLAN COMMUNICATION #56

RE: General Plan Draft Environmental Document
Duden Family Trust Property AP# 46-450-32 & 33

Dear Mr. Yost:

As representative of the Duden Family Trust on the above referenced property, I had an opportunity to meet with your planner Debbra Faaborg on 15 January 1998. This meeting was to determine the status on the time schedule for responding to the draft general plan regarding land use designations and anything else that would be related to this property. Debbra was very helpful and informative and explained that the 21 January 1998 deadline for comments had to do with the environmental issues by other government agencies and local environmental groups to the draft document. Our concern as I explained to Debbra was the proposed land use designation and our need to respond to this 21 January deadline if needed, she explained that the deadline was for environmental areas and that the land use issues would be part of the public hearing phase of the Draft General Plan Review expected somewhere in March or April.

56.1 G

The reason for this letter is to request that your staff keep us informed to any deadlines for filing responses to the draft document regarding this property. At present we are under the understanding that no comments need to be filed for the 21 January deadline and that this was not related to land use designations.

Thank you for your cooperation in this matter and if there are any questions I can answer please do not hesitate in calling me.

Respectfully,
Fenken Realty, Inc.

Michael Fennell
Vice President

c:c Sandra Bertolone, Trustee
Debbra Faaborg

JAN 1998
RECEIVED
City of Napa
Planning

71

ROBERT M. RUGG

20 Garfield Lane, Napa, CA 94558
(707) 255-4786

GENERAL PLAN COMMUNICATION # 57

January 23, 1998



City of Napa
Planning Department
1600 First Street
Napa, CA 94559-0660
Attention: Ms. Deborah Faaborg

Dear Ms. Faaborg:

After our discussion today on the proposed extension of Sierra Avenue to the Salvador Channel, I researched all the pertinent documents and found the source of the problem. It appears to be a reiteration of an obsolete position contained in two Draft General Plan documents. They are the Revised Draft EIR and Addendum #3 to the Draft General Plan Policy Document.

Prior to adoption of the Big Ranch Specific Plan, the earlier draft General Plan update documents contained an extension of Sierra Avenue to the Salvadore Channel. This concept was replaced in the Draft BRSP with one which extended Sierra Avenue to join Garfield Lane. The City Council in its public hearing of September 24, 1996, deleted two circulation items which were highly objectionable to the public: the extension of Trower Avenue to Garfield Lane and the extension of Sierra Avenue to Garfield Lane. At this time, there was no mention made, much less discussion of any extension of Sierra Avenue whatsoever. Hence, both the earlier concepts of extending Sierra Avenue were abolished. This fact is clearly illustrated in both the adopted version of the BRSP and in Resolution 96-235 which adopted the BRSP. Both these documents contain the revised Figure #3.3 Roadway System Plan which reflects no extension of Sierra Avenue of any kind. 57.16

Addendum #3 to the General Plan Draft Policy Document states in its background paragraph: "This addendum to the draft policy document has been prepared to incorporate the adopted specific plan land use designations and circulation revisions into the Draft General Plan." These actions were taken by the Planning Department with the exception of deletion of the extension of Sierra Avenue to the Salvador Channel.

This same erroneous entry appears in the General Plan Revised Draft EIR which

cites Policy T-1.9h. This particular policy predates adoption of the BRSP and has been made obsolete by Resolution 96-235 and adoption of the BRSP.

I am certain that the continued existence of the obsolete, aborted extension of Sierra Avenue to the Salvador Channel is simply an administrative oversight---a small item among a myriad of details to correct and to correlate among many documents. It is inconceiveable that it would be otherwise in light of the violent public opposition to extending either Trower or Sierra to Garfield Lane at both the Planning Commission and City Council public hearings relative to adoption of the BRSP. In fact, in the almost thirty-four years I have been a property owner in Napa and in recalling public sentiment I have witnessed at Planning Commission and City Council public hearings, I can recall no items of public interest which received so large a turnout and opposition so strongly expressed as was the opposition to the extension of either Trower or Sierra to Garfield Lane. In my most recent contacts with neighbors I found that this sentiment remains intact. They were absolutely shocked to learn that an extension of Sierra Avenue of any kind is still contained in any current planning documents. We view the obsolete extension of Sierra to the Salvador Channel, deleted by the BRSP adopted by the City Council, as a potential means of ultimately extending Sierra to Garfield Lane. All that would remain to achieve such a thing would be to replace the bridge over the Salvador Channel. I hope to be able to report to them in the near furure that this administrative oversight is just that and is being, or better yet, has been corrected.

57.1 G

Thank you very much for your kind attention to this matter.

Sincerely,

Robert M. Rugg

73

Governor's Office of Planning and Research
1400 Tenth Street
ramento, CA 95814

GENERAL PLAN COMMUNICATION # 58



January 23, 1998

JOHN YOST
CITY OF NAPA
P.O. BOX 660
1600 FIRST STREET
NAPA, CA 94559

Subject: CITY OF NAPA GENERAL PLAN UPDATE SCH #: 95033060

Dear JOHN YOST:

The State Clearinghouse submitted the above named environmental document to selected state agencies for review. The review period is closed and none of the state agencies have comments. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. 58.1

Please call at (916) 445-0613 if you have any questions regarding the environmental review process. When contacting the Clearinghouse in this matter, please use the eight-digit State Clearinghouse number so that we may respond promptly.

Sincerely,

Antero A. Rivasplata

ANTERO A. RIVASPLATA
Chief, State Clearinghouse

74

APPENDIX E

Notice of Completion and Environmental Document Transmittal Form

See NOTE below

SCH # 95-03-3060

Mail to: State Clearinghouse, 1400 Tenth Street, Sacramento, CA 95814 — 916/445-0613

1. Project Title: CITY OF NAPA REVISED DEIR AND RESPONSE TO COMMENTS FOR DRAFT GENERAL PLAN
2. Lead Agency: City of Napa — 3. Contact Person: John Yost, Planning Director
3a. Street Address: P.O. Box 660 - 1600 First Street — 3b. City: Napa
3c. County: Napa — 3d. Zip: 94559 — 3e. Phone: (707) 257-9530

Project Location: Lands within planning area of City of Napa
4. County: Napa — 4a. City/Community: City of Napa
4b. Assessor's Parcel No.: Napa County Books 1,2,3,4,5,6,7,35,36,38,39,40,41,42,43,44,45,46,47,49,50,52
5a. Cross Streets: NA — 5b. For Rural, Nearest Community: NA
6. Within 2 miles: a. State Hwy #: HWY 29,121,12 &221 — b. Airports: Napa County Airport
c. Railways: Napa Wine Train — d. Waterways: Napa River

7. Document Type
CEQA: 01. ☐ NOP; 02. ☐ Early Cons; 03. ☐ Neg Dec; 04. X Draft EIR; 05. ☐ Supplement/Subsequent EIR (Prior SCH No.: _____); 06. ☐ NOE; 07. X NOC; 08. ☐ NOD
NEPA: 09. ☐ NOI; 10. ☐ FONSI; 11. ☐ Draft EIS; 12. ☐ EA
OTHER: 13. ☐ Joint Document; 14. ☐ Final Document; 15. X Other: Response to Comments and Addenda to Drft. Gen. Plan

FILED
DEC 8 1997
STATE CLEARINGHOUSE

8. Local Action Type
01. X General Plan Update; 02. ☐ New Element; 03. ☐ General Plan Amendment; 04. ☐ Master Plan; 05. ☐ Annexation; 06. ☐ Specific Plan; 07. ☐ Community Plan; 08. ☐ Redevelopment; 09. ☐ Rezone; 10. ☐ Land Division (Subdivision, Parcel Map, Tract Map, etc.); 11. ☐ Use Permit; 12. ☐ Waste Mgmt Plan; 13. ☐ Cancel Ag Preserve; 14. ☐ Other: _____

9. Development Type
01. X Residential: Units _____ Acres _____
02. X Office: Sq.ft. _____ Acres _____ Employees _____
03. X Shopping/Commercial: Sq.ft. _____ Acres _____ Employees _____
04. X Industrial: Sq.ft. _____ Acres _____ Employees _____
05. X Water Facilities: MGD _____
06. X Transportation: Type _____
07. ☐ Mining: Mineral _____
08. X Power: Type _____ Watts _____
09. X Waste Treatment: Type _____
10. ☐ OCS Related
11. X Other: Per required content of General Plan

12. Project Issues Discussed in Document
01. X Aesthetic/Visual; 02. X Agricultural Land; 03. X Air Quality; 04. X Archaeological/Historical; 05. ☐ Coastal Zone; 06. X Economic; 07. X Fire Hazard; 08. X Flooding/Drainage; 09. X Geologic/Seismic; 10. X Jobs/Housing Balance; 11. ☐ Minerals; 12. X Noise; 13. X Public Services; 14. X Schools; 15. ☐ Septic Systems; 16. X Sewer Capacity; 17. X Social; 18. X Soil Erosion; 19. X Solid Waste; 20. X Toxic/Hazardous; 21. X Traffic/Circulation; 22. X Vegetation; 23. X Water Quality; 24. X Water Supply; 25. X Wetland/Riparian; 26. X Wildlife; 27. X Growth Inducing; 28. X Incompatible Land Use; 29. X Cumulative Effects; 30. X Other: Per req. cont. GP

13. Funding (approx.) Federal $ _____ State $ _____ Total $ _____

14. Present Land Use and Zoning: 1986 General Plan

15. Project Description
Comprehensive Revision of City's General Plan

16. Signature of Lead Agency Representative: Deborah Yost Date: 12/5/97

State Clearinghouse Number assigned with Notice of Preparation: # 95-03-3060

State Clearinghouse Contact: Mr. Chris Belsky (916) 445-0613

State Review Began: 12.8.97
Dept. Review to Agency: 1.15
Agency Rev to SCH: 1.20
SCH COMPLIANCE: 1.22

Please note SCH Number on all Comments
95033060
Please forward late comments directly to the Lead Agency

AQMD/APCD 2 (Resources: 12/13)

Project Sent to the following State Agencies

- X Resources
- ____ Boating
- ____ Coastal Comm
- ____ Coastal Consv
- ____ Colorado Rvr Bd
- X Conservation
- X Fish & Game # 3
- ____ Delta Protection
- ____ Forestry
- ____ Parks & Rec/OHP
- ____ Reclamation
- ____ BCDC
- X DWR
- X OES

Bus Transp Hous
- ____ Aeronautics
- ____ CHP
- X Caltrans # 4
- ____ Trans Planning
- X Housing & Devel

Health & Welfare
- ____ Drinking H20
- ____ Medical Waste

State/Consumer Svcs
- ____ General Services
- ____ Cal/EPA
- ____ ARB
- ____ CA Waste Mgmt Bd
- ____ SWRCB: Grants
- ____ SWRCB: Delta
- ____ SWRCB: Wtr Quality
- ____ SWRCB: Wtr Rights
- X Reg. WQCB # 5.2
- ____ DTSC/CTC

Yth/Adlt Corrections
- ____ Corrections

Independent Comm
- ____ Energy Comm
- X NAHC
- ____ PUC
- ____ Santa Mn Mtns
- X State Lands Comm
- ____ Tahoe Rgl Plan
- X Other: Food/Ag

75

APPENDIX B

JANUARY 1998
AVIATION COMPATIBILITY ANALYSIS
BY SHUTT MOEN ASSOCIATES

APPENDIX E

Stanly Ranch Environmental Impact Report

Aviation Compatibility Analysis

January 1998

A Discussion Paper
Prepared for
Brady ▪ LSA

by
Shutt Moen Associates

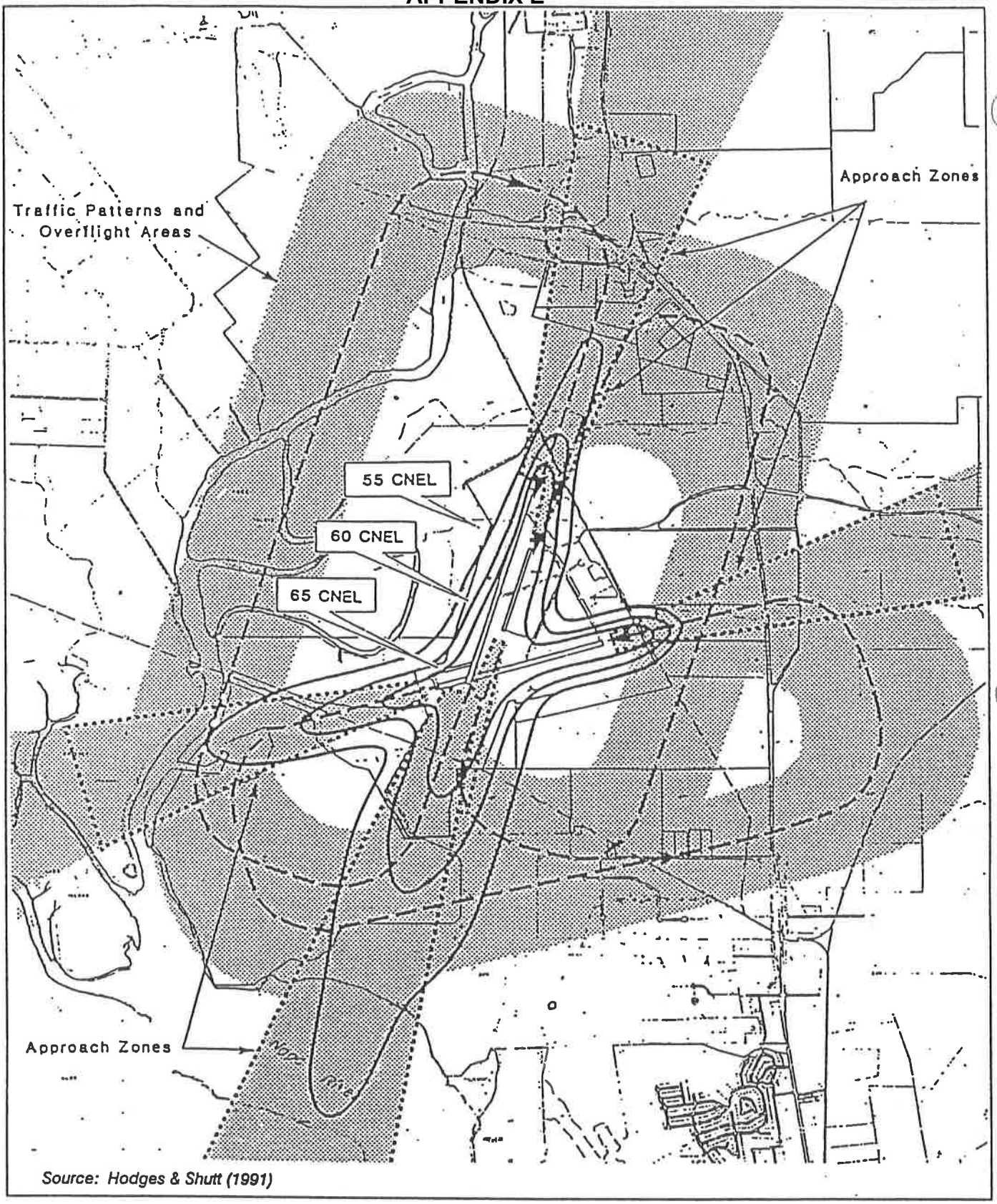
INTRODUCTION

Shutt Moen Associates was retained by Brady▪ LSA to provide insight into several airport land use compatibility issues that could potentially affect the proposed Stanly Ranch development. Our general task is to evaluate the comments and recommendations presented by Mr. Carl Kangas in his letter to the Napa County Airport Land Use Commission (dated August 12, 1997). Mr. Kangas is a member of the Commission and a commercial pilot. For ease of review, our evaluation follows the format of Mr. Kangas' letter. Key text is quoted in *italics* followed by our analysis.

ITEM #1: NOISE LEVEL CONTOURS

Kangas: *Figure 5C, page 5-8* [of the Napa County Airport Land Use Compatibility Plan] *does not show noise levels under the traffic pattern.* The text goes on to state that both personal experience and published single-event noise levels for the Bonanza A-36 and C-90 support this conclusion.

Analysis: As is noted on Figure 5C (Figure 1 in this report), the noise contours depicted are measured in CNEL. CNEL is a cumulative noise metric. The flyover noise levels quoted by Mr. Kangas are single-event measures. It is important to understand the differences between cumulative and single-event noise metrics.



Source: Hodges & Shutt (1991)

Figure 1

Airport Impact Areas

Napa County Airport

- Cumulative Noise Metrics

  As was noted in the *Compatibility Plan* (page 2-1):

  "Airport noise is particularly difficult to measure because of the widely varying characteristics of the individual sounds and the intermittent nature of their occurrence. In an attempt to provide an appropriate measure of airport noise impacts, various composite noise level descriptors have been devised. The [noise] descriptor used in California to measure cumulative noise impact is the Community Noise Equivalent Level (CNEL). CNEL values are calculated using a complex set of equations based upon several factors:

  - The single-event noise exposure levels for each type of aircraft
  - The volume of activity and mode of operation by aircraft type
  - Runway utilization and flight patterns
  - The time of day when the operations occur"

  While flyover noise levels are one component of CNEL contours, there is no direct correlation between an individual noise event and the CNEL contour for an airport.

  In Figure 1, it can be seen that the noise contours for the airport do not encompass the project site. Therefore, from an ALUC policy perspective, noise is not a significant concern.

- Single-Event Noise Metrics

  Included in Mr. Kangas' letter were excerpts from the pilot operating manuals for the Bonanza A-36 and C-90. The copied material indicates that the aircraft will produce 74.3 dBA and 76.7 dBA, respectively, at ground level during an overflight. These numbers represent the peak noise exposure that would be experienced under standard conditions. This peak noise level is a type of single-event noise measure typically referred to as L_{max}. One can gain some insight into the intrusiveness of the single-event noise levels produced by the Bonanza A-36 and C-90 by comparing them to common sources of noise:

  - Normal speech at 3 feet 65 dB
  - Power mower at 100 feet 70 dB
  - Garbage disposal at 3 feet 80 dB
  - Diesel truck at 50 feet 85 dB

  Although, there is general agreement within the aviation industry on thresholds of significance for CNEL, there are no accepted standards for single-event noise thresholds. The report issued by the Federal Interagency Committee on Noise concluded that while single-event noise measures can be good at predicting short-term response, they are not good at predicting long-term annoyance. Because there is no accepted threshold for single-event sound levels associated with aircraft operations, noise compatibility must be evaluated based upon the cumulative noise measure: CNEL.

ITEM #2: COMPATIBILITY ZONES

Kangas: *There are two Zone D areas that are encroached on in part by Zone Es, specifically the areas south of Green Island Road to the south of the airport, and an area northwest of the airport, west of the Napa River. Both of these E zones are overflown... I see no valid reason for the incursion of those E zones into the traffic patterns, which should all be D zones. For safety reasons, the entire traffic pattern should be a Zone D.*

Analysis: Until the preparation of the Caltrans *Airport Land Use Planning Handbook* in 1993, it was widely assumed that the accident potential under the traffic pattern was substantial, although probably lower than in the approaches to runways. Data developed by the U.C. Berkeley Institute for Transportation Studies for the *Handbook* refuted that long-held assumption. The Institute for Transportation Studies collected accident location data from National Transportation Safety Board files and correlated the location with the associated runway. Data was collected on some 400 accidents near airports throughout the United States. As can be seen in Figures 2 and 3, there are very few accidents lateral to the runway. Many of those that are lateral to the runway would have remained on-airport.

The Caltrans *Airport Land Use Planning Handbook* (in Chapter 9) discusses the relationship between accident potential and land uses characteristics. Six safety zones are delineated and acceptable forms of development are identified for each zone. The zones range from the Runway Protection Zone, the most restrictive, to the Traffic Pattern Zone, the least restrictive. The *Handbook* notes on page 9-23 that within the Traffic Pattern Zone "... the potential for aircraft accidents is relatively low and the need for land use restrictions is thus minimal." Therefore, it is concluded that safety to those on the ground would not be a significant concern.

In the preceding paragraphs it has been concluded that neither aircraft noise or safety were significant concerns for the proposed Stanly Ranch project. However, the potential exists for annoyance associated with overflights. The *Handbook* notes on page 3-8 that:

> Experience at many airports has shown that noise-related impacts do not stop at the boundary of the outermost mapped CNEL or DNL contour. Many people are sensitive to the frequent presence of aircraft overhead even at noise levels lower than typically measured by cumulative noise level contours. A fear factor also contributes to this sensitivity.

Concern for the impacts of overflights shaped development of compatibility policies by the Napa County Airport Land Use Commission. On page 5-9, the *Airport Land Use Compatibility Plan* identified the Stanly Ranch area as "an area of concern with respect to future land use compatibility". In 1991, when the *Compatibility Plan* was adopted, the Stanly Ranch parcel was designated as a Special Study Area and zoned for Planned Development. Two specific compatibility measures were recommended:

APPENDIX E

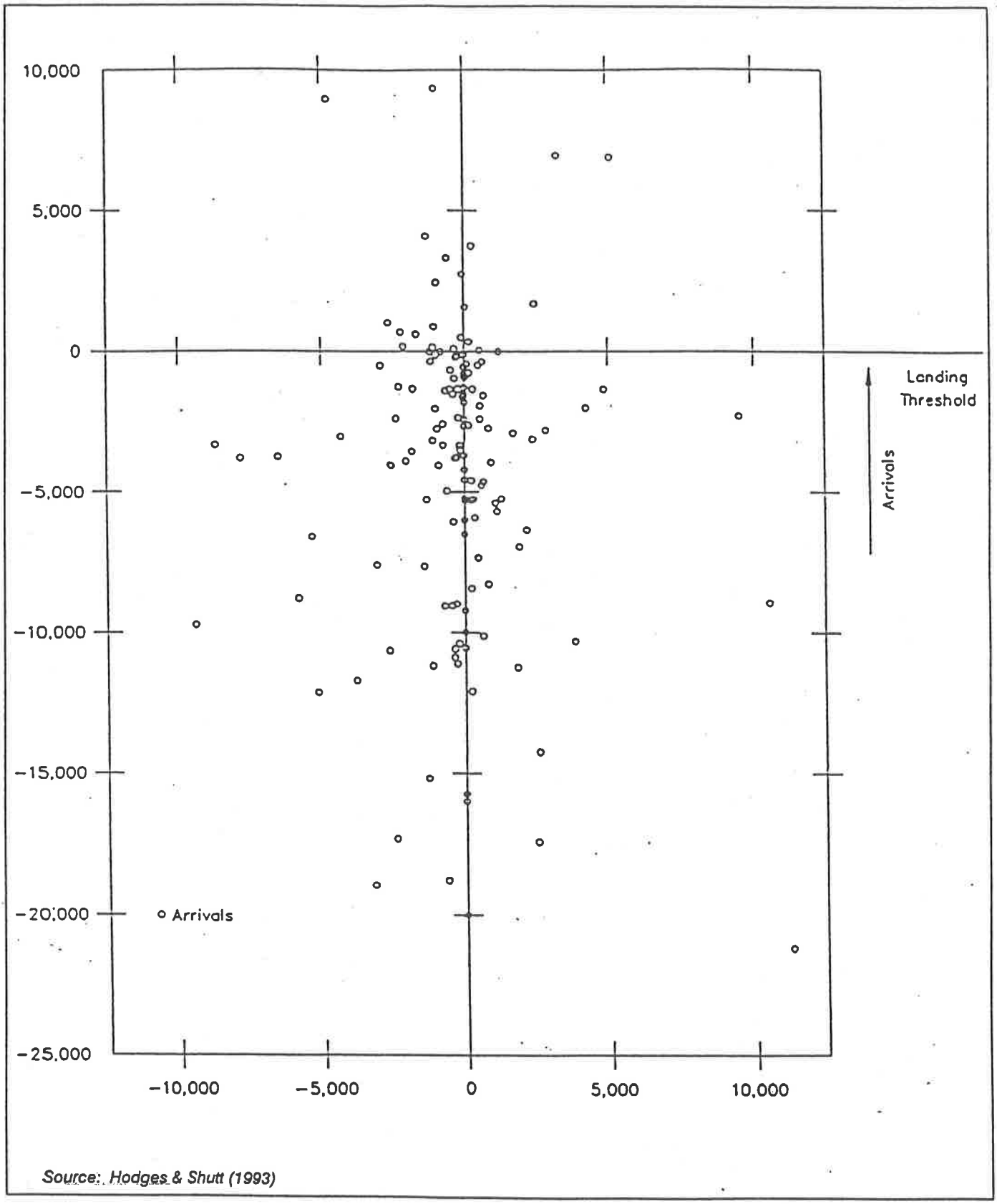


Figure 2

Arrival Accident Location Pattern

Napa County Airport

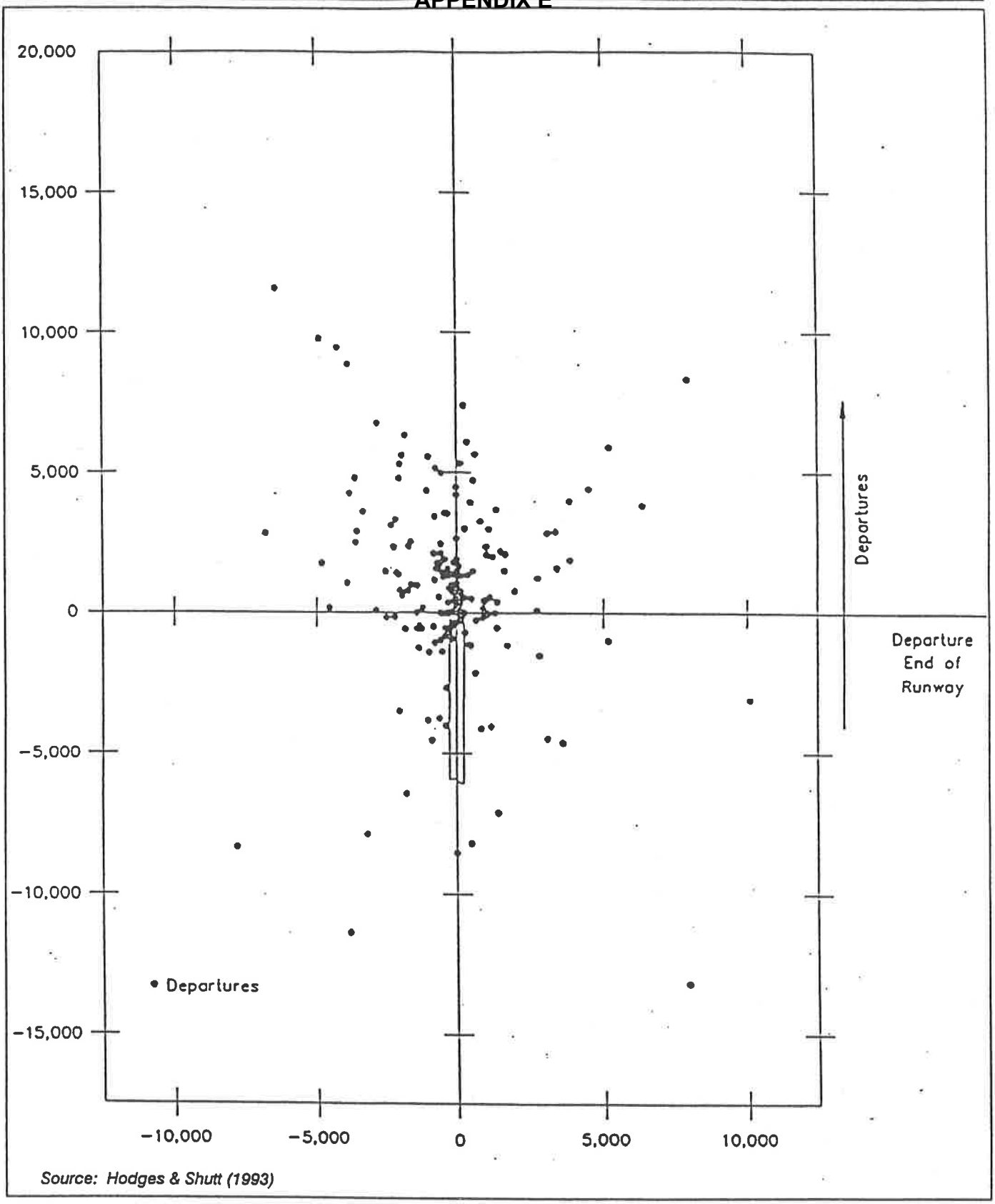


Figure 3

Departure Accident Location

Napa County Airport

1. Residential development should be limited to areas outside of the traffic pattern. In this area the floodplain of the Napa River encompasses the Airport's traffic pattern area (designated as Zone D in this Plan).

2. Buyer notification should be required (i.e., dedication of overflight easements).

The *Compatibility Plan* then goes on to recommend that specific development plans for the Stanly Ranch "be referred to the Airport Land Use Commission for a consistency determination".

When it was adopted by the Airport Land Use Commission in 1991, the intent was to permit development on the Stanly Ranch site, but use site design and overflight easements to obtain an acceptable level of compatibility. This is consistent with the compatibility objective for overflight impacts described in the *Handbook* on page 3-8:

> ... to help people with above-average sensitivity to aircraft overflights — people who are highly annoyed by overflights — to avoid living in locations where frequent overflights occur.

Kangas: *Allowing residential building in a traffic zone is not consistent with the Airport Land Use Compatibility Plan. See page 3-12, paragraph 3.4.2.*

Analysis: Not all areas that are commonly overflown are considered part of the "traffic pattern." The *Airport Land Use Compatibility Plan* defines the Traffic Pattern Area (Zone D) as those areas where aircraft on the common flight paths are between 300 and 1,000 feet above the ground. The Common Flight Paths (Zone E) are those areas where aircraft are generally 1,000 feet above the ground. Policy 3.4.2 addresses Zones A through D. Within Zones A through D, residential uses are restricted. Zone E is addressed in Policy 3.4.3. Residential uses within Zone E are not directly restricted.

The *Compatibility Plan* contained a graphic that presented the traffic patterns and overflight areas for the Napa County Airport (Figure 1). The center of the west side traffic pattern for Runway 18R-36L is depicted as 6,000 feet west of the runway. An overflight area is defined that is 4,000 feet wide, 2,500 feet west of the center of the traffic pattern and 1,500 east.

To assess the current validity of this traffic pattern delineation, telephone interviews were conducted with air traffic controllers in the Napa Tower on December 2, 1997. Discussions were also held with staff from Japan Airlines' (JAL) training program at Napa County Airport. Neither the controllers nor JAL staff believe that the traffic pattern has changed since the *Compatibility Plan* was prepared. However, based upon these interviews, the traffic patterns can be more precisely defined:

- Single-engine aircraft, other than JAL — 4,000 - 5,000 feet west of runway
- JAL single-engine aircraft (A-36) — 6,700 feet west of runway
- Twin-engine aircraft, including JAL C-90 — 7,300 feet west of runway
- Jet aircraft — 7,000+ feet west of runway

ITEM #3: NOISE

Kangas: *As stated in Item #1, actual noise values of aircraft using the Napa County Airport exceed the recommended guidelines for residential land use ...*

Analysis: As was noted earlier, this conclusion is a result of not realizing that CNEL is a cumulative noise metric having no direct relationship to individual noise events.

Kangas: *... the frequency of overflights can be as often as one per minute during peak traffic periods which are from as early as 7:00 a.m. to as late as 10:00 p.m.*

Analysis: Although no formal documentation exists, an overflight frequency of one per minute during busy periods is very plausible. However, both air traffic control and JAL staff indicate that it is rare for there to be multiple aircraft in the pattern before 8:30 a.m. Multiple aircraft training operations at night are also uncommon.

Kangas: *Residents along Milton Road have made numerous noise complaints in the past. To allow more residential building in the same traffic pattern would not be wise land use and could only invite more noise complaints, despite avigation easements and disclosures.*

Analysis: Noise complaints have come in the past from the Milton Road area. The number of noise complaints is small enough and infrequent enough that the County has never developed a formal system for responding to noise complaints. As an organized record (i.e., database) does not exist, it is not possible to analyze the pattern of complaints. Anecdotal information suggests that noise complaints are most commonly associated with unusual events, such as an unusually loud jet.

While the use of easements and disclosure statements *reduces* the probability of noise complaints of future property owners, these measures are unlikely to *prevent* all noise complaints. These measures reduce the likelihood that individuals highly sensitive to aircraft noise will acquire a residence near an airport. However, aircraft noise that did not seem intrusive when a house was acquired, can become a significant source of annoyance over time. If aircraft operations increase or there is an increase in the number of louder aircraft, residents may complain even if they were told at the time of purchase that this was anticipated to occur. It is unfortunate, but true, that many people are poor predictors of their sensitivity to aircraft noise.

While the principal purpose of avigation easements is to alert potential purchasers that a property is likely to be exposed to aircraft overflights, easements also confer certain rights to the airport. The various enumerated rights (e.g., right of overflight) enable normal aircraft operations to occur in the vicinity of the airport. The use of easements reduces the liability, if any, that may result from aircraft operations.

ITEM #4: OPEN SPACE

Kangas: *There are several references to the need for open space for emergency landing in the ALUCP. Page 2-6 states that an area as small as 75 feet by 300 feet can be adequate for a survivable emergency landing. This may have been true at one time for much lighter and slower aircraft than we now operate. This size is nowhere near adequate for the higher performance single-engine airplanes operating at the Napa County Airport today.*

Analysis: There has actually been very little change in the types of light aircraft using Napa County Airport in several decades. With the exception of a small number of turboprop models, the high-performance, single-engine aircraft using the airport are virtually identical with the types of aircraft that have been using the field for three decades. The Bonanza A-36 is typical of this class of aircraft. This model aircraft was first sold in 1968. Although there have been modifications to the aircraft over the years, its basic performance characteristics have not changed significantly.

The dimensions for emergency landing sites quoted from the *Compatibility Plan* (75 feet by 300 feet), are based upon reviews of National Transportation Safety Board accident briefs. Records of actual accidents have shown that a football-field sized open area is enough:

- To be quickly recognized as a potential landing site by a panicky pilot
- To get a plane down and slowed before impacting an object on the ground
- To permit the occupants to survive, possibly with injuries, even if the aircraft is demolished

Larger emergency landing sites are better, of course. However, the concept behind football-field-sized sites is to increase the chances that the aircraft occupants can survive a forced landing. Damage to the aircraft is not a consideration. Moreover, larger sites *with the necessary characteristics* are usually difficult to site in an urbanized area. To be well suited as an emergency landing site, an open area must be relatively flat and free from large objects (e.g., trees and buildings). Golf courses and parks are common examples of sites that can have usable open space. However, it is important to realize that open space for emergency landing sites do not need to look like a runway to be usable. For example, parking lots — even when full of cars — have been successfully used many times. Anecdotal information suggests that this is because cars can function as arresting barriers by crumpling under the impact of a light aircraft.

CHANGES IN PATTERNS OF AIRPORT USE

Shutt Moen Associates was also charged with documenting changes in the patterns of aircraft use at the Napa County Airport since the *Airport Land Use Compatibility Plan* was adopted in 1991. Changes relevant to this analysis are:

- Number of aircraft operations
- Fleet mix
- Traffic pattern

Activity at an airfield is typically measured in terms of the number of annual aircraft operations. An operation is either a landing or a takeoff. The training maneuver known as a "touch-and-go" entails a landing where the plane does not come to a complete stop before power is applied and the aircraft takes off. This counts as two operations. In Table 1 it can be seen that the current number of operations is substantially the same as in 1991. However, from 1991 to 1994 the number of operations grew significantly. This trend was reversed after 1994 and the number of operations declined 35%. This reduction in use is largely attributable to reductions in the number of JAL student pilots based at Napa County Airport. The reduction in activity is parallel to the number of aircraft based at the airport.

Fleet mix is the mixture of aircraft types using an airport. A change in fleet mix could affect noise levels associated with a particular airport. Except for JAL's training operation, no documentation exists on the fleet mix at Napa County Airport. Anecdotal information suggests that there has been an increase in transient jet operations since 1991, although the total number remains small. In contrast, the changes to the training aircraft used by JAL is well documented. Piper Arrows and Aztecs were being used for training when the *Compatibility Plan* was developed. Since that time, JAL has switched to Beech A-36s and C-90s. Because of its turboprop engines and higher pattern altitude, the C-90 may have been perceived as quieter than the Aztec that it replaced. However, the A-36 is significantly louder than the Arrow. Staff with JAL has indicated that they received numerous complaints when the A-36 was introduced.

JAL has not changed its traffic patterns since 1991. As was noted earlier in the text, the training program calls for the A-36 to be flown 1.1 nautical miles (6,700 feet) west of Runway 18R-36L. The C-90 is flown 1.2 nautical miles (7,300 feet) west of the runway. Turns toward Runway 18R are not made until aircraft pass north of Highway 29. This places JAL training aircraft over the eastern portion of the Stanly Ranch. JAL staff indicated that they believe that their aircraft stay within one-tenth of a nautical mile of their intended flight path. That is, A-36s will fly no farther than 1.2 nautical miles west of the runway, and C-90s no farther than 1.3 nautical miles (7,900 feet) west of the runway. Even with this variation, the JAL aircraft remain within the overflight area presented earlier (Figure 1).

Over the period since 1991, the hours in which JAL conducts its training operations has varied. Most operations are conducted between 8:30 a.m. and 5:00 p.m. However, when JAL had its peak number of students in 1993 and 1994 (200 students), the daylight hours during summer evenings were also used. Since JAL's current number of students is just over 100, there has not been a need to use summer evenings. Limited amounts of night training also occurs. In prior years, much of the night training occurred at Napa County Airport. Due to changes in training requirements, night training operations now occur at both Napa County Airport and other airports. Napa County Airport is used whenever weather (especially fog) might make it difficult for aircraft to return from another airport.

	1991	1992	1993	1994	1995	1996	1997
Operations							
Itinerant	69,599	75,904	79,758	110,118	87,955	75,762	67,500*
Local	109,941	130,851	123,972	130,804	100,906	85,288	80,750*
Total	*179,540*	*206,755*	*203,730*	*230,922*	*188,861*	*161,050*	*148,250**
Based Aircraft	243	236	254	253	243	245	223

*Estimated based on first 10 months' data.

Source: Napa County Airport (1997)

Table 1

Annual Activity
Napa County Airport

Appendix A
References

Grahm, Devin, Air Traffic Control Manager. December 2, 1997. Federal Aviation Administration, Napa Airport Air Traffic Control Tower. Telephone interview.

Hill, Ed, Chief Instructor for JAL. December 3, 1997. Telephone interview.

Hodges & Shutt. April 22, 1991. *Airport Land Use Compatibility Plan* prepared for Napa County Airport Land Use Commission.

_____. December 1993. *Airport Land Use Planning Handbook* prepared for Caltrans Division of Aeronautics.

Kangas, Carl. August 12, 1997. Letter to Napa County Airport Land Use Commission.

Watson, David, Air Traffic Control Specialist. December 2, 1997. Federal Aviation Administration, Napa Airport Air Traffic Control Tower. Telephone interview.

APPENDIX C

APRIL 15, 1998
LETTER FROM
REGIONAL WATER QUALITY CONTROL BOARD

APPENDIX E

GENERAL PLAN COMMUNICATION # 74

Cal/EPA

Pete Wilson
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April 15, 1998
File No. 2138.04



RE: **Follow-up Comments on General Plan, *Envision 2020***

Ms. Faaborg:

As we discussed yesterday on the phone, the City of Napa has begun a planning process for its stormdrain system which will could have a large impact on how the City implements its urban run-off program. In our letter of January 21, 1997, we expressed disappointment in the level of specificity contained in the Revised General Plan, especially as it pertained to non-point pollution and water quality. Recently, we received a portion of the draft Storm Drain Master Plan that addresses many of our concerns. Therefore, would appear that the Storm Drain Master Plan is a more appropriate place describe the City's urban runoff program. We will continue to work with the City's Department of Public Works to ensure that the stormdrain planning effort address urban runoff pollution.

The General Plan should describe problem areas, actions, and implementation measures that the City is fairly certain will be addressed in the next one to five years. The level of specificity should be more general than, but fully supportive of the Storm Drain Master Plan. Though the Master Plan is far from complete, we know generally what will need to be addressed regarding urban runoff. In fact, many of the elements of an urban runoff program can and should be implemented right now.

These elements are based largely on a national model as well as the requirements found in NPDES stormwater permits issued to cities of similar size to Napa. (see permits for Vallejo, Fairfield-Suisun, sent to you via email).

For instance, it would seem appropriate for the General Plan to list the essential major elements of a typical urban runoff program:

- Program Management
- Illicit Discharge
- Industrial/Commercial Sources
- New Development and Redevelopment
- Public Agency Activities
- Public Information and Participation
- Program Evaluation
- Monitoring

The means by which the City tackles these issues would be addressed in the Master Plan and other lower tier documents. Most problematic for other cities has been the issue of new development guidelines for minimizing runoff from new development sites. We feel that the General Plan should address this issue in singularity as peak-flow runoff; as well as, in concert with impacts to fish and wildlife habitat (e.g., review for threatened, rare and endanged species). I look forward to working with you and your colleagues on this project.

If you have questions or comments, you can reach me at (510) 286-0841.

Sincerely,

Thomas R. Gandesbery
Environmental Specialist

cc: Ms. Judith Sears, Friends of the Napa River

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93