

ORDINANCE O2024-\_\_

ORDINANCE OF THE CITY COUNCIL OF THE CITY OF NAPA, STATE OF CALIFORNIA, AMENDING TITLE 17 OF THE NAPA MUNICIPAL CODE TO ADD A NEW CHAPTER 17.31 ESTABLISHING A MASTER PLAN ZONE DISTRICT (MP), AMENDING THE ZONING MAP TO PRE-ZONE (APNs 038-240-005, 038-240-006, 038-240-014, 038-240-015, 038-240-020, 038-240-022, 038-240-023, 038-160-023, 038-160-024, 038-160-025, 038-160-026, 038-160-029), FROM SINGLE FAMILY RESIDENTIAL (RS-5, RS-7, RS-10, RS-20) TO MP AND DETERMINING THAT THE ACTIONS AUTHORIZED WERE ANALYZED BY A PREVIOUSLY CERTIFIED ENVIRONMENTAL IMPACT REPORT

WHEREAS, on September 20, 2022, by City Council Resolution R2022-085, the City Council certified that certain Environmental Impact Report for the City of Napa 2040 General Plan (SCH #2021010255), and on October 18, 2022, by City Council Resolution R2022-098, the City Council approved and adopted an Addendum to the certified Environmental Impact Report for the City of Napa 2040 General Plan, which together are referred to herein as the “General Plan EIR”; and

WHEREAS, on October 18, 2022, by the same City Council Resolution R2022-098, the City Council adopted the City of Napa 2040 General Plan (“2040 General Plan”). The 2040 General Plan is the culmination of a three-year long process to identify, formulate and establish long-term goals, objectives and policies for the operation, maintenance, and development of the City and the City government through the year 2040; and

WHEREAS, the 2040 General Plan reflects the community’s vision for its growth and evolution, addressing a wide range of topics that affect the character and quality of life in Napa; and

WHEREAS, the 2040 General Plan addresses future land uses and new development, and includes policies for sustainable development by, among other things, making more efficient use of available land by allowing higher density development and minimizing the adverse effects of new development on the environment to ensure that it does not unduly contribute to global warming and climate change; and

WHEREAS, Theresa Van Winden-Staegs (“Applicant”) is the owner of the property at 2331 Big Ranch Road and representative of the property owners of 2275, 2285, 2305 Big Ranch Road, 1130 Trower Avenue (only the portion within the City’s Rural Urban Limit Line and south of the future Trower Avenue extension) and 1438 Rosewood Lane (APNs 038-240-005, 038-240-014, 038-240-020, 038-240-022, 038-240-023, 038-160-029). Collectively these six (6) properties (together, the “Annexation Properties”) totaling approximately 51.5 acres and are more particularly identified on Exhibit A hereto.

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WHEREAS, on October 23, 2023, the Applicant submitted an application (File No. PL23-0143) to (a) annex of the Annexation Properties to the City of Napa, and (b) amend the current pre-zoning for the Annexation Properties, from Single Family Residential District to Master Plan District as provided by NMC Section 17.26 (“Master Plan District”); and

WHEREAS, this Ordinance shall also amend the current pre-zoning, from Single-Family Residential to Master Plan District, for six additional parcels that are not currently proposed for annexation (APNs 038-160-023, 038-160-024, 038-160-025, 038-160-026, 038-240-006, 038-240-015); and

WHEREAS, together, all twelve parcels proposed for pre-zoning by this Ordinance (the “Pre-Zoning Properties”) comprise the “Big Ranch Road area” that is the subject of Goal LUCD-24 of the 2040 General Plan; and

WHEREAS, for purposes of this Ordinance, the proposed annexation of the Annexation Properties and the proposed pre-zoning of the Pre-Zoning Properties are together referred to herein as the “Project”; and

WHEREAS, to comply with the California Environmental Quality Act (Public Resources Code §§ 21000—21189.70.10) (hereafter, “CEQA”) and its implementing regulations (California Code of Regulations §§ 15000—15387) (hereafter, the “CEQA Guidelines”), the City caused the preparation of an initial study and consistency analysis pursuant to Section 21083.3 of CEQA and Sections 15168 and 15183 of the CEQA Guidelines, to assess the consistency of the Project with the 2040 General Plan and the General Plan EIR, a copy of which is attached as Exhibit B and incorporated herein by reference (the “Section 15183 Consistency Analysis”); and

WHEREAS, on September 19, 2024, the Planning Commission held a noticed public hearing on the application and recommended that the City Council authorize City staff to submit the application to LAFCO and that it adopt the Zoning Ordinance Amendment; and

WHEREAS, on October 15, 2024, the City Council held a duly noticed public hearing and considered all information related to this matter, including the Project application, a staff report and staff and Applicant presentations, the 2040 General Plan and the General Plan EIR, the Section 15183 Consistency Analysis, and all other materials and information available during the City’s processing of the application.

NOW, THEREFORE, BE IT ORDAINED, by the City Council of the City of Napa as follows:

**SECTION 1: CEQA Determination.** The City Council hereby determines that the potential environmental effects from the actions authorized by this Ordinance were adequately analyzed in the General Plan EIR and, pursuant to Public Resources Code Section 20183.3 and Sections 15183 and 15168 of the CEQA Guidelines, and no additional environmental review is required for the Project because the Project is

consistent with the development density and use characteristics established by the 2040 General Plan and there are no potentially significant environmental effects that (1) are peculiar to the Project or the Site, (2) were not analyzed as significant effects in the 2040 General Plan EIR, (3) are potentially significant off-site impacts and cumulative impacts which were not discussed in the 2040 General Plan EIR, or (4) are previously identified significant effects which, as a result of substantial new information which was not known at the time the 2040 General Plan EIR was certified, are determined to have a more severe adverse impact than discussed in the 2040 General Plan EIR. These findings are set forth in greater detail, accompanied by the substantial evidence in support thereof, in the “Section 15183 Consistency Analysis, a copy of which is attached as Exhibit B and incorporated herein by reference (the “Section 15183 Consistency Analysis”)

### **SECTION 2: Findings.**

A. The City Council hereby makes the following Zoning Amendment findings in accordance with NMC Section 17.66.080:

1. *The proposed amendment is consistent in principle with the General Plan.*

The proposed zoning amendment is consistent with the General Plan medium density residential land use designation in that the proposed amendment will correct an existing inconsistency between the 2040 General Plan and the zoning of single family residential as General Plan Policy LUCD 24-1 prescribes that the portion of the Big Ranch Road area that has yet to be annexed must be re-zoned to a master plan district prior to allowing any new development. The proposed master plan designation is consistent with the General Plan’s vision for a master plan that will outline an overall development plan providing for walkable, connected neighborhoods with easy access to Vintage High School, stores, and amenities on Trancas Street as well as the future extension of Trower Avenue to Big Ranch Road consistent with the planned roadway improvements identified in Table 3-2 and Figure 3-3 of the General Plan’s Transportation Element. In addition to General Plan Policy LUCD 24-1, Policies 24-2 & 24-3 contain parameters that must be applied to future development of the Big Ranch Road area. These Policies will ensure the development would be compatible with surrounding land uses by requiring lower density transitions to rural edges and providing a smooth visual transition from the existing residential to higher density development. The General Master Plan designation will be a placeholder for a future Big Ranch Road Master Plan district that will be prepared to include development and design standards that are consistent with these General Plan policies and that will also implement the goals, objectives, and policies of the Medium Density Designation of the General Plan for the Big Ranch Road area that is being annexed to the City.

2. *The public health, safety and general welfare are served by the adoption of the proposed amendment.*

The proposed amendment is in the public interest, since it is consistent with the principles and policies of the General Plan, such as: outlining an overall development plan providing

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for walkable, connected neighborhoods with easy access to Vintage High School, stores, and amenities on Trancas Street as well as the future extension of Trower locating appropriate land uses within the boundaries and urban limits of the City of Napa; as well as designating which land uses are complementary to the mix of uses within the city; and, determining that they are appropriate to its surroundings. The General Plan EIR references and contemplates development in the Big Ranch area consistent with the Big Ranch Specific Plan which was adopted in 1996, and which incorporates the proposed annexation area. Neither of these documents identified any potential health or safety impacts related to development within the Project area. Overall, the proposed change to Master Plan Zoning would ensure that any uses allowed are consistent with the designations laid out in the General Plan and all impacts from this change have already been adequately analyzed by the previously certified Environmental Impact Report.

3. *If a rezoning to a district with a larger minimum lot size is proposed, effectively reducing the planned residential density, the City shall also find that the remaining sites in the Housing Element are adequate to accommodate the jurisdiction's share of the regional housing need pursuant to California Government Code Section 65584; or if not, that it has identified sufficient additional, adequate and available sites with an equal or greater residential density in the jurisdiction so that there is no net loss of residential unit capacity.*

This finding is not applicable to this project because: 1) the project does not include any proposal to increase a minimum lot size, 2) nor does it eliminate any site designated in the Housing Element from future use as a housing site.

- B. The City Council hereby makes the following Master Plan findings in accordance with NMC Section 17.26.080:

1. *The Master Plan is consistent with the General Plan and other City plans or policies that apply to the property.*

The proposed rezoning of the Property to MP district is consistent with the General Plan, since it provides a Master Plan placeholder for a future, property-specific Master Plan that will outline an overall development plan providing for walkable, connected neighborhoods with easy access to Vintage High School, stores, and amenities on Trancas Street as well as the future extension of Trower Avenue to Big Ranch Road consistent with the planned roadway improvements identified in Table 3-2 and Figure 3-3 of the General Plan's Transportation Element. The future Big Ranch Road Master Plan will provide for future development that is consistent with the Medium Density Residential land use designation in the 2040 General Plan.

2. *Any residential development shall constitute a residential environment of sustained desirability and stability that responds to its context.*

The proposed rezoning provides for a future, property-specific Master Plan that will comport with General Plan Policy LUCD 24-1 that prescribes that a master plan must be

prepared and adopted for the portion of the Big Ranch Road area that is being annexed with this "Project" prior to allowing any new development. The proposed master plan designation is consistent with the General Plan's vision for a master plan that will outline an overall development plan providing for walkable, connected neighborhoods with easy access to Vintage High School, stores, and amenities on Trancas Street as well as the future extension of Trower Avenue to Big Ranch Road consistent with the planned roadway improvements identified in Table 3-2 and Figure 3-3 of the General Plan's Transportation Element. The future Big Ranch Road Master Plan development, when proposed, will provide for future development that is consistent with the Medium Density Residential land use designation in the 2040 General Plan. Based on this, any future residential development will constitute a residential environment of sustained desirability and stability based on walking and other connectedness that will be established based on policies contained within the General Plan.

- 3. Any nonresidential uses shall be appropriate in area, location and overall planning for the purpose intended, and the design and development standards shall create a nonresidential environment of sustained desirability and stability that respond to their context.*

The properties rezoned to a Master Plan District will be subject to the Medium Density Residential Land Use Designation of the General Plan 2040 which provides for housing densities ranging between 8.0 to 18.0 units per gross acre. Housing types would typically encompass single-family detached and attached, but multi-family housing types may be permitted where maximum permitted density is otherwise not attainable due to lot configuration or development constraints. Consistent with General Plan policies, the future Big Ranch Road Master Plan will not incorporate any non-residential development. Therefore, this finding is not applicable to this application.

- 4. The applicant demonstrates that public facilities are provided to serve the anticipated population.*

The rezoning to a Master Plan District provides for a future Big Ranch Road Master Plan that will comport with General Plan Policy LUCD 24-1 that prescribes that a master plan be prepared and adopted for the portion of the Big Ranch Road area prior to allowing any new development. The proposed Master Plan Zoning designation would allow for development consistent with the General Plan that outlines an overall development plan providing for walkable, connected neighborhoods with easy access to Vintage High School, stores, and amenities on Trancas Street as well as the future extension of Trower Avenue to Big Ranch Road consistent with the planned roadway improvements identified in Table 3-2 and Figure 3-3 of the General Plan's Transportation Element. Any necessary public facilities (if needed) will be analyzed by the future Big Ranch Road Master Plan to be adopted at a later date and prior to the first residential development application.

- 5. The motor vehicle, bicycle and pedestrian traffic system provides adequate area and on-site connections for circulation needs and public safety.*

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The rezoning to a Master Plan District provides for a future Big Ranch Road Master Plan that will outline an overall development plan providing for walkable, connected neighborhoods with easy access to Vintage High School, stores, and amenities on Trancas Street as well as the future extension of Trower Avenue to Big Ranch Road consistent with the planned roadway improvements identified in Table 3-2 and Figure 3-3 of the General Plan's Transportation Element. The future master plan will include a motor vehicle, bicycle and pedestrian traffic system that provides adequate area and on-site connections for circulation needs and public safety.

- 6. For sites in mixed use land use categories, that General Plan mixed use goals and policies, and objectives of the general mixed-use regulations in Chapter 17.52 have been met.*

The Project site is not located in a mixed-use land category.

**SECTION 3: Zoning Ordinance Text Amendment.** Title 17 of the Napa Municipal Code is hereby amended to add a new Chapter 17.31 to read as set forth in Exhibit "C", attached hereto and incorporated herein by reference.

**SECTION 4: Zoning Map Amendment.** The Zoning Map of the City of Napa, as defined by Napa Municipal Code Sections 17.02.020.A and 17.06.030, and the boundaries of the Districts of such map, are hereby amended pursuant to Chapter 17.66 of such Code to rezone the Property (as shown on Exhibit "D1") to MP (as shown in Exhibit "D2") attached hereto and made a part hereof; pursuant to the findings contained in Section 2 of this Ordinance.

**SECTION 5: Severability.** If any section, sub-section, subdivision, paragraph, clause or phrase in this Ordinance, or any part thereof, is for any reason held to be invalid or unconstitutional, such decision shall not affect the validity of the remaining sections or portions of this Ordinance or any part thereof. The City Council hereby declares that it would have passed each section, sub-section, subdivision, paragraph, sentence, clause or phrase of this Ordinance, irrespective of the fact that any one or more sections, sub-sections, subdivisions, paragraphs, sentences, clauses or phrases may be declared invalid or unconstitutional.

**SECTION 6: Effective Date.** This Ordinance shall become effective thirty (30) days following adoption.

City of Napa, a municipal corporation

MAYOR: \_\_\_\_\_

ATTEST: \_\_\_\_\_  
CITY CLERK OF THE CITY OF NAPA

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STATE OF CALIFORNIA }  
COUNTY OF NAPA } SS:  
CITY OF NAPA }

I, Tiffany Carranza, City Clerk of the City of Napa, do hereby certify that the foregoing Ordinance had its first reading and was introduced during the public meeting of the City Council on the 3<sup>rd</sup> day of December, 2024, and had its second reading and was adopted and passed during the public meeting of the City Council on the \_\_\_ day of \_\_\_\_\_, 2024, by the following vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

ATTEST: \_\_\_\_\_  
Tiffany Carranza  
City Clerk

Approved as to Form:

\_\_\_\_\_  
Christopher Diaz  
Interim City Attorney



EXHIBIT “B”

SECTION 15183 CONSISTENCY ANALYSIS

**Big Ranch Road Annexation-  
CEQA Initial Study for Determination of Consistency (with the 2040 General Plan EIR)**

The purpose of this document is to provide the required environmental review, pursuant to the California Environmental Quality Act (Public Resources Code sections 2100—21189.70.10) (“CEQA”) and its implementing regulations (California Code of Regulations sections 15000—15387) (the “CEQA Guidelines”), of a proposal to amend the City of Napa’s (“City”) pre-zoning designation for approximately 66 acres of land (herein, the “Project Site”) adjacent to the City’s border and annex approximately 51.5 acres of said land into the City boundaries. Together, the proposed pre-zoning amendment and the annexation of the Project Site are referred to herein as the “Project.”

Public Resources Code Section 21083.3 and CEQA Guidelines Section 15183 provide:

“...projects that are consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified shall not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site.”

These provisions of CEQA are intended to streamline the environmental review of certain types of projects, and to reduce the need to prepare repetitive environmental studies. These provisions of CEQA apply to projects that are consistent with a General Plan for which an environmental impact report (“EIR”) was certified by the lead agency. Per CEQA Guidelines section 15183(i)(2):

“...consistent means that the density of the proposed project is the same or less than the standard expressed for the involved parcel in the general plan, community plan or zoning action for which an EIR has been certified, and that the project complies with the density-related standards contained in that plan or zoning. Where the zoning ordinance refers to the general plan or community plan for its density standard, the project shall be consistent with the applicable plan.”

The future annexation of the Project Site was anticipated in the 2040 General Plan, and on September 20, 2022, the City Council certified the City of Napa 2040 General Plan Update EIR, State Clearinghouse No. 2021010255, which is comprised of the Draft EIR, the Partial Recirculated Draft EIR, the Final EIR, and the Addendum thereto (hereafter, the “General Plan Update EIR”).

Section 15183(a) of the CEQA Guidelines provides that, in approving a project meeting these requirements, “a public agency shall limit its examination of environmental effects to those impacts that the agency determines, in an Initial Study or other analysis:

- are peculiar to the project or the parcel on which the project would be located,
- are not analyzed as significant effects in a prior EIR on the zoning action, general plan or community plan,
- are potentially significant off-site impacts and cumulative impacts that were not discussed in the prior EIR prepared for the general plan, community plan or zoning action, or
- are previously identified significant effects which, as a result of substantial new information which was not known at the time the prior EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR”

This Initial Study and Consistency Analysis has been prepared to determine whether the Project is consistent with

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the development density established by the 2040 General Plan, to examine the potential environmental effects of the Project as required by Section 15183, and to determine whether the Project has the potential to result in any new or substantially more severe environmental impacts that were not identified and addressed in the General Plan Update EIR. Based on this Initial Study and Consistency Analysis, the City has determined that this document and attachments provide a description of the proposed Project and substantial evidence to confirm that no further environmental review is required under the California Environmental Quality Act (CEQA) per Section 15168(c) of Title 14 of the California Code of Regulations (the CEQA Guidelines because (i) the potential environmental effects of the Project were adequately evaluated and addressed in the General Plan Update EIR, and (ii) the Project will not have any new or substantially more severe environmental effects that were not identified and addressed in the General Plan Update EIR. Therefore, no additional environmental review is required, as mandated by and consistent with Public Resources Code Section 21083.3 and Sections 15168 and 15183 of the CEQA Guidelines.

Consistent with the CEQA Guidelines, this Initial Study and Consistency Analysis also contains the following information:

- A description of the Project, including its location.
- An examination of whether the Project is consistent with the Napa General Plan, and other applicable land use controls.
- An identification of the existing environmental setting; and
- An identification of potential environmental effects of the Project, using a checklist method that includes adequate explanation and evidence to support the Checklist entries.

The City of Napa (City) is the lead agency for review of the proposed Project under the California Environmental Quality Act (CEQA). As demonstrated in the attached checklist the proposed Project is within the scope of the certified General Plan Update EIR certified by the City Council on September 20, 2022.

### PROJECT DESCRIPTION

The Project consists of (i) changing the pre-zoning of the Project Site from its existing Single-Family Residential designation to Master Plan (MP), and (ii) annexing the Project Site into the boundaries of the City. The Project Site is located at the northeastern corner of the City of Napa within the City's Rural Urban Limit ("RUL"), on the west side of Big Ranch Road approximately 1,500 feet north of Garfield Lane. The Project Site Project Site is located entirely within the City's Sphere of Influence ("SOI") and is adjacent to the existing City limits along a majority of the south and west sides of the annexation area. The proposed Project would consolidate service areas and promote consistency with the City of Napa's SOI and RUL by redrawing the City's boundaries in a more logical and consistent manner by incorporating the Project Site Project Site into the City's boundaries. The Project Site Project Site currently includes low density single family residential units, agricultural uses, and vacant/undeveloped parcels in an area that is designated by the City's General Plan for Medium Density Residential (8 -18 dwelling units per acre [du/ac]) land uses.

Additionally, the proposed Project would not authorize or permit any new development on the Project Site, as any future development within the Project Site Project Site either would be required to comply with the City's zoning ordinance (which implements the City's General Plan Land Use designations) or would be subject to applications for discretionary permits that would separately require their own review and analysis for compliance with CEQA.

### Location and Surrounding Land Uses

As noted above, the Project Site is located on Big Ranch Road, within the City of Napa Rural Urban Limit (RUL) in the northeastern corner of the RUL, approximately 1,500 feet north of Garfield Lane. The approximately 66-acre Project Site is characterized by low density single family residential units, agricultural uses, and vacant/undeveloped parcels. The Project Site is bordered by Vintage High School to the west, Big Ranch Road to the east, and residential uses to the north and south.

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Exhibit A shows the project site's local context.



of a master plan.

### **NAPA 2040 GENERAL PLAN**

In 2022, the City adopted the 2040 General Plan. The General Plan is a comprehensive long-range plan that will be used to direct the City's land use planning decisions through the year 2040. The General Plan Update EIR was certified in 2022 and evaluates the environmental impacts of 3.55 million square feet of commercial building space, 11,500 new jobs, 7,800 new residential units, and 17,900 new residents. The Planning Area for the General Plan Update EIR includes all of the land within the City limits and land within the City's Sphere of Influence (SOI), including the Project Site. Table A shows the total development assumptions relevant to the proposed Project evaluated within the General Plan Update EIR and the development totals of projects that have either been approved or are currently under review, not including the proposed Project.

The General Plan seeks to promote annexation of the unincorporated pockets to further community cohesion, and efficiently provide services, including sewer, water, solid waste and recycling collection, police protection, fire protection, and code enforcement. Recognizing the challenges associated with annexation, the California Legislature passed a Streamlined Island Annexation Process (Government Code § 56375.3) which allows a Local Agency Formation Commission (LAFCO) to sometimes shorten LAFCO's process of approving an annexation, provided that the criteria are met for the definition of an "unincorporated island."

### Tiering Environmental Review Under CEQA and the CEQA Guidelines

CEQA and the CEQA Guidelines provide for various forms of 'streamlined' environmental review when a site-specific development proposal is consistent with a general plan for which an EIR was certified. Two examples of such streamlined environmental review are provided by Sections 15183 and 15168 of the CEQA Guidelines. As explained above (see page 2) and demonstrated herein, the Project is consistent with the City's 2040 General Plan land use designation for the Project Site, and the City certified the General Plan Update EIR for the 2040 General Plan; therefore, the Project is eligible for both of these streamlined forms of environmental review. Pursuant to Sections 15168 and 15183 of the CEQA Guidelines, the City prepared the following CEQA Checklist and Analysis to determine the appropriate scope of environmental review for the instant Project, given the Project's consistency with the 2040 General Plan land use designation and the environmental evaluation in the General Plan EIR.

### The General Plan Update EIR

The General Plan Update EIR is a "program" EIR, as defined by Section 15168 of the CEQA Guidelines, prepared to evaluate the potential environmental impacts from the City's adoption and implementation of the 2040 General Plan. It serves as a source of information in the review of subsequent planning and development proposals, including subsequent environmental review of development projects, for infrastructure provision and individual development proposals, and for public facilities to serve new development. According to Section 5.5 of the General Plan Update EIR,

CEQA has several provisions for streamlining the environmental impact review of later projects that are consistent with the General Plan. The City will use this Draft EIR as the basis for streamlining CEQA reviews of future residential, commercial, and office development that is consistent with the General Plan. As the lead agency for future development projects, the City will be responsible for determining which if any of CEQA's streamlining methods may apply to a given project. In any case, the City will determine whether the impacts of such projects were adequately analyzed in the General Plan Update EIR and, if it finds any project was not, will prepare subsequent CEQA documents to disclose the project-specific impacts and identify feasible mitigation.

The City will use an initial study checklist to simplify the process of using the General Plan Update EIR as the basis for environmental analyses of future projects that are consistent with the General Plan. This will assist the City in identifying future projects that qualify for CEQA streamlining and identifying any new or more

severe significant effects that would require the preparation of a subsequent or supplemental CEQA document.

### Significant Unavoidable Impacts

In the General Plan Update EIR and associated Initial Study, the City determined that development consistent with Napa General Plan would, for the most part, result in impacts that would be less than significant, or would result in impacts that would be reduced to less than significant levels, with implementation of the policies set forth in the 2040 General Plan and other existing regulatory requirements. However, the General Plan Update EIR determined that, in some circumstances, development consistent with the 2040 General Plan would result in certain significant impacts that could not be avoided:

- **Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance:** While the proposed goals and policies of the General Plan would protect most of the farmland in the Planning Area from conversion to non-agricultural use, it is not guaranteed that farmland designated for uses other than agricultural would be preserved. Further, approximately 15 acres of Farmland of Statewide Importance in the Big Ranch Road area is part of a planned development area identified by the 2040 General Plan (Goal LUCD-24). Future development would be guided under a master plan (Policy LUCD 24-1), and planned uses include low- to medium-density residential. As such, the 2040 General Plan would result in conversion of Farmland of Statewide Importance to non-agricultural use. Given that housing development is a main objective of the General Plan and that this Site is currently zoned and planned for residential uses, mitigation to prevent conversion of this farmland would be contrary to the General Plan and not practicable. Therefore, this impact is significant and unavoidable.
- **Conversion of Agricultural Land:** The 2040 General Plan would not result in changes to existing forest land or forest uses. However, as described under Impact AF-1, implementation of the General Plan has the potential to introduce non-agricultural uses such as higher density residential on or near farmland (e.g., the vineyard on El Centro Avenue north of Salvador Creek), and the General Plan would also convert agricultural uses of Farmland of Statewide Importance at the Big Ranch Road area to residential uses (Goal LUCD-24 and policies LUCD 24-1 through LUCD 24-5). While concentrated infill development within Focus Areas and other planned growth sites would reduce changes to existing environments adjacent to or near other existing farmland or forest land and thereby reduce the likelihood of conversion of these lands to non-agricultural or non-forest use (respectively), the targeted objective of residential development in the Big Ranch Road area constitutes a significant and unavoidable impact, with no feasible mitigation measures.
- **Conflict with 2017 Bay Area Clean Air Plan:** Implementation of the 2040 General Plan would incorporate applicable control measures of the 2017 Clean Air Plan and would not disrupt or hinder implementation of any of these control measures. Also, the increase in vehicle trips associated with resident and service populations is lower than the rate of their projected increases. However, because development consistent with the General Plan would result in an increase in criteria pollutant emissions, it would conflict with the primary goals of the 2017 Clean Air Plan. Given that the General Plan already includes policies that would help reduce impacts to the maximum extent feasible, its implementation would have a significant an unavoidable impact, and there are no additional feasible mitigation measures.
- **Cumulative Criteria Air Pollutants:** Given that the 2040 General Plan incorporates policies that meet each of the applicable control strategies intended to achieve regional attainment of NAAQS and CAAQS, all feasible mitigation measures would be applied through implementation of the Plan. However, because the effect of these reductions cannot be quantified and in consideration of the extent by which the 2040 General Plan development would exceed some of BAAQMD's significance thresholds, the General Plan's impact on the cumulatively considerable increase in criteria pollutants for which the region is in nonattainment is significant and unavoidable.

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- **Project-Level Criteria Air Pollutants:** The 2040 General Plan would allow residential land uses that would be new sensitive receptors and non-residential land uses that are a potential for new emissions sources, as well as increase traffic volumes that exacerbate existing mobile sources. The Plan would establish buffers between potential air pollution sources and sensitive receptors and limit pollution during construction. Other exposure reduction strategies including requirement of air filters, expansion of urban forestry, speed reduction, and traffic management, would minimize the General Plan's contribution to existing sources as well as protect future sensitive receptors. The General Plan's impact on sensitive receptors from exposure to substantial pollutant concentrations would thus be minimized to the maximum extent feasible with implementation of the Plan. Nevertheless, uncertainty regarding the effects of individual projects allowed under the Plan during construction and the cumulative contribution of operational emissions within an already-significant context would make the 2040 General Plan's impact significant and unavoidable overall.
- **Project-Level GHG Emissions.** The City of Napa does not have a Qualified GHG Reduction Strategy (i.e., a climate action plan), and the 2040 General Plan was analyzed quantitatively. Quantified estimates of the General Plan's operational emissions would result in a significant impact. Unquantified construction emissions would further contribute to the overall total, though qualitatively less-than-significant when considered alone. As such, the City has preemptively determined that it is necessary to adopt a climate action plan as a Qualified GHG Reduction Strategy in order to ensure that the City and the General Plan would further the State's and region's GHG reduction goals. Proposed Policy CCS 1-5 would require the City to work with BAAQMD and other relevant agencies and partners to adopt a climate action plan as a Qualified GHG Reduction Strategy to address the GHG reduction goals of EO B-55-18, SB 32, and EO S-03-05. Implementation of this policy would lower the General Plan's impacts below both BAAQMD's current and proposed plan-level significance thresholds for GHG. However, because implementation of this policy (i.e., adoption of a Qualified GHG Reduction Strategy) cannot be guaranteed, this impact is significant and unavoidable.
- **Conflict with Applicable Air Quality Plans.** The 2040 General Plan is consistent with applicable Plan Bay Area strategies, and proposed policies that would achieve net reductions in GHG emissions and otherwise implement a Qualified GHG Reduction Strategy to meet targets established by EOs S-3-05 and B-55-18. However, due to the scale of emissions reductions needed to comply with these targets and given that adoption of a Qualified GHG Reduction Strategy cannot be guaranteed, this impact would be significant and unavoidable.

Due to these potentially significant and unavoidable impacts, the City adopted a Statement of Overriding Considerations as part of its approval of the Napa 2040 General Plan.

### Cumulative Effects

CEQA Guidelines Section 15183 does not affect a lead agency's obligation to analyze a project's potentially significant offsite or cumulative impacts if those impacts were not adequately discussed in the prior EIR. However, if the project's significant off-site or cumulative impacts were adequately discussed in the prior EIR, then the lead agency may rely on the analysis in the prior EIR and exclude further analysis of those off-site or cumulative impacts. This analysis considers whether the potential offsite and cumulative effects of the instant Project were adequately addressed in the General Plan Update EIR, consistent with the provisions of Section 15183.

### Applicable Mitigation Measures

Because the 2040 General Plan was the subject of a Program EIR under Section 15168 of the CEQA Guidelines, all subsequent development activities within the scope of the General Plan program are required to implement the General Plan Update EIR mitigation measures, including applicable General Plan policies, as well as all other City standards, standard conditions of approval, and applicable regulatory requirements.

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### ENVIRONMENTAL CHECKLIST PURSUANT TO CEQA GUIDELINES SECTION 15168

CEQA Guidelines Section 15168(c)(4) recommends using a written checklist or similar device to confirm whether the environmental effects of a subsequent activity were adequately covered in a program EIR. This checklist confirms that the proposed Project is within the scope of the General Plan Update EIR, would have no new adverse environmental effects, and no new mitigations are required. As such, the City can approve the proposed Project as being within the scope of the General Plan Update EIR pursuant to Public Resources Code Section 21166 and CEQA Guidelines Section 15168 and 15162, and no further environmental review is required for the proposed Project.

The following checklist addresses each of the environmental topics required under CEQA, and for each topic, identifies whether or not the proposed Project would: 1) include substantial changes or be substantially affected by a change in circumstances that would require major revisions to the General Plan Update EIR; 2) result in new or increased significant impacts as a result of new information; 3) result in less-than-significant impacts or have no new changes or information that would require the preparation of a subsequent IS/MND or EIR; or 4) result in no impact.

Each discussion topic begins with a list of the applicable General Plan and General Plan policies followed by an overview of the impacts identified in the General Plan Update EIR. A discussion of the proposed Project impacts, as compared to those impacts identified in the General Plan Update EIR, is then followed by identification of applicable General Plan mitigation measures and/or recommended conditions of approval. The summary conclusion at the end of each checklist topic identifies whether or not the proposed Project falls within the scope of the General Plan Update EIR. Unless specifically noted, the analysis and conclusions provided for each checklist topic would apply to both project variants described in Attachment A, Project Description.

In accordance with the CEQA Guidelines, the City has determined that no new environmental document is required for the proposed Project. As previously stated, the purpose of this document is to review the proposed Project and examine whether, as a result of any changes or new information, a subsequent EIR may be required. This examination includes an analysis of the provisions of CEQA Section 21166 (Subsequent or Supplemental Impact Report; Conditions) and their applicability to the proposed Project in each topical section. Similarly, each section also includes an evaluation of CEQA Guidelines Section 15162 (Subsequent EIRs and Negative Declarations) and their applicability to the proposed Project. This document relies on the environmental analysis below which addresses CEQA Guidelines Appendix G, Environmental Checklist, topics section by section pursuant to CEQA Guidelines Section 15168(c)(4). The environmental checklist includes findings as to the physical environmental impacts of the proposed Project in comparison with the findings of the General Plan FEIR, consistent with Sections 15162 and 15168 of the CEQA Guidelines.

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## Aesthetics

Would the Project:	Napa General Plan Update EIR Findings	Relationship to Napa General Plan Update EIR Impact Findings			Project Conclusions
		Equal or Less Severe	Adequately Addressed in General Plan EIR	New or Substantially More Severe	Resulting Level of Significance
a) Have a substantial adverse effect on a scenic vista	No Impact	■	■	□	No Impact
b) Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway	No Impact	■	■	□	No Impact
c) As the Project is located in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality	LTS	■	■	□	LTS
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area	LTS	■	■	□	LTS

**a) Would the Project have a substantial adverse effect on a scenic vista**

The EIR adopted for the General Plan found that impacts to scenic vistas would be less than significant assuming compliance with goals and policies that ensure that new development would be designed in a manner that is aesthetically pleasing and sensitive to adjacent land uses, including the natural and historical contexts (Goals HCR-9 and NRC-3 and NRC-4, Policies HCR 9-1, 9-2, 9-3, and NRC 3-1, 3-2, 4-1, 4-2, and 4-3). This objective would be achieved through building, infrastructure, and utility placement and design; the use of landscaping and site amenities; and design review to ensure that General Plan policies are addressed in proposed designs for renovations, infill, and new development. The policies also maintain and improve existing, and provide for new, visual access to important features such as the river, open spaces, and parks (Goals LUCD-1, LUCD-3, and LUCD-25, Policies LUCD 3-2, 3-3, 3-4, 25-3, and 25-7). At other locations, however, higher densities for residential, commercial, and mixed-use development would create a visual environment that is more concentrated, with a more urbanized appearance compared to a visual environment that currently contains lower densities (Goals LUCD-1, LUCD-2, LUCD-3, and LUCD-14, Policies LUCD 11-2, 14-1 to 14-4, LUCD 24-2, and HCR 9-1). The visual environment would change from lower density development to more suburban or urban development. Some viewers may prefer the lower density visual environment, while others may perceive this transition favorably. However, the General Plan update measures are meant to ensure that new developments would achieve a high standard of visual quality that would be consistent with existing regulations governing scenic quality. In addition, because most of the new development would occur within or adjacent to Napa city limits, in areas that are already developed to some extent, impacts would be less than significant, and no mitigation is necessary.

**Project Analysis**

The Project Site comprises developed and disturbed lands and does not contain any prominent scenic vistas under existing conditions. As previously indicated, no development or construction plans are being processed as part of the proposed Project. The City’s General Plan does not include any designated scenic vista; therefore, the Project has no potential to have a substantial adverse effect on a scenic vista and there would be no impact to scenic vistas.

Consistent with the conclusion reached by the General Plan Update EIR, mandatory compliance with applicable goals and policies of the 2040 General Plan would ensure that future development within the Project Site does not have a substantial adverse effect on a scenic vista. Based on the foregoing analysis, the project would not result in any new significant impacts not already analyzed in the General Plan Update EIR or increase the severity of a significant impact as previously identified and analyzed in the General Plan Update EIR.

### **b) Damage Scenic Resources within a State Scenic Highway**

The General Plan Update EIR determined that there are no scenic highways in the City of Napa. Therefore, the visual character and quality of scenic routes would not be affected by implementation of the 2040 General Plan Update and there would be no impact.

### **Project Analysis**

The City of Napa does not contain any Officially Designated State Scenic Highways. However, SR 29 from Trancas Street to the Lake County border is identified as eligible for official scenic highway designation. The segment of SR-29 at Trancas Street is over 2 miles north of the Project Site. Therefore, the Project is not located adjacent to a designated state scenic highway and as such, would not damage scenic resources within a designated state scenic highway. Consistent with the findings of the General Plan Update EIR, the Project would not have a substantial adverse effect on scenic resources within a designated state scenic highway, and no mitigation is required.

### **c) Substantially Degrade Visual Character**

The General Plan Update EIR (Impact AES-1) found that implementation of the 2040 General Plan would not result in large-scale land use changes that would create substantial changes in aesthetics and visual resources, as General Plan update policies would ensure that degraded existing visual conditions in the City are improved through renovations, infill, and blight reduction (Goals LUCD-1, LUCD-2, and LUCD-3, Policies LUCD 3-1, 3-2, 3-6, 5-1, 5-2, 5-3). Additionally, the General Plan ensures that new development would achieve a high standard of visual quality that would be consistent with existing regulations governing scenic quality. The policies ensure that new developments would be designed in a manner aesthetically pleasing and sensitive to adjacent land uses, including the natural and historical contexts (Goals HCR-9 and NRC-3 and NRC-4, Policies HCR 9-1, 9-2, 9-3, and NRC 3-1, 3-2, 4-1, 4-2, and 4-3). Higher densities for residential, commercial, and mixed-use development would create a visual environment that is more concentrated, with a more urbanized appearance compared to a visual environment that currently contains lower densities (Goals LUCD- 1, LUCD-2, LUCD-3, and LUCD-14, Policies LUCD 11-2, 14-1 to 14-4, LUCD 24-2, and HCR 9-1). The General Plan Update EIR additionally states that, because most of the new development would occur within or adjacent to City limits, in areas that are already developed to some extent, impacts would be less than significant, and no mitigation is necessary.

### **Project Analysis**

The Project Site comprises an area that was planned for residential development by the 2040 General Plan. The Proposed Project would be subject to the Medium Density Residential land use designation of the General Plan, which typically provides for single-family detached and attached housing types. General Plan Policies LUCD 24-1, 24-2 & 24-3 contain parameters that must be applied to future development of the Big Ranch Road area. These Policies will ensure the development would be compatible with surrounding land uses by requiring lower density transitions to rural edges and providing a smooth visual transition from the existing residential to higher density development. As a result, the Proposed Project would not substantially degrade visual character nor introduce new or more severe impacts than what was previously analyzed in the General Plan EIR. No additional analysis is required. No development or construction plans are proposed as part of the Project. Any future proposals for development within the Project Site would be subject to compliance with all applicable requirements of the underlying zoning classifications and may also require appropriate review for compliance with CEQA. There are no components of the proposed Project that would result in a conflict with applicable zoning and other regulations

governing scenic quality. As such, the impact would be less than significant. Therefore, the Project would not result in any new significant impacts not already analyzed in the General Plan Update 2040 General Plan EIR or increase the severity of a significant impact as previously identified and analyzed in that EIR.

**d) New Source of Substantial Light and Glare**

The General Plan Update EIR (Impact AES-2) found that new development allowed by the General Plan update could increase light and glare in the Planning Area by removing vegetation that provides shade, introducing reflective surfaces, and increasing interior and exterior nighttime lighting that would affect daytime and nighttime views. However, under California’s 2019 Building Energy Efficiency Standards, all new or altered residential and nonresidential buildings in California must meet a set of mandatory requirements for lighting systems and lighting controls that are designed to help limit light pollution and ensure light levels are appropriate for the area served.

Additionally, the General Plan update includes policies that could reduce light and glare, including Safety and Noise Element Policy SN 6-7 which seeks to reduce the impacts of lighting by incorporating dark sky initiatives, such as lights that cast little or no light upwards in public areas or roadways, turning off lights in empty buildings at night, and Safety and Noise Element Policy SN 6-8. This policy addresses appropriate lighting standards in the City’s Municipal Code for streetlights and all residential and commercial artificial outdoor lighting using the Illuminating Engineering Society’s design guidelines, and in compliance with International Dark-Sky Association–approved fixtures. The General Plan Update EIR found that impacts associated with light and glare from future development as a result of the General Plan update would be minimized through implementation of these policies, and the impact would be less than significant.

**Project Analysis**

The proposed Project consists of amending the pre-zoning for approximately 66 acres and annexing approximately 51.5 acres into the City that is planned for residential development by both the General Plan and the Napa County General Plan. No development or construction is proposed as part of the Project. Thus, the Proposed Project would be subject to the Medium Density Residential land use designation of the General Plan, which typically provides for single-family detached and attached housing types. General Plan Policies LUCD 24-1, 24-2 & 24-3 contain parameters that must be applied to future development of the Big Ranch Road area. These Policies will ensure the development would be compatible with surrounding land uses by requiring lower density transitions to rural edges and providing a smooth visual transition from the existing residential to higher density development. As a result, the Proposed Project would not introduce new or more severe impacts than what was previously analyzed in the General Plan EIR. No additional analysis is required. the Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area, and impacts would be less than significant.

**CEQA Conclusion**

As explained above, the General Plan Update EIR adequately evaluated the aesthetic impacts of the proposed Project. See General Plan EIR 3.1.2. Therefore, potential impacts would be less than significant and additional mitigation is not required.

**Agriculture and Forestry Resources**

<b>Would the Project:</b>	<b>Napa General Plan Update</b>	<b>Relationship to Napa General Plan Update EIR Impact Findings:</b>	<b>Project Conclusions:</b>
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	EIR Findings	Equal or Less Severe	Adequately Addressed in General Plan EIR	New or Substantially More Severe	Resulting Level of Significance
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use	Significant and Unavoidable Impact	■	■	□	No Impact
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract	Less than Significant Impact	■	■	□	No Impact
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))	No Impact	■	■	□	No Impact
d) Result in the loss of forestland or conversion of forestland to non-forest use	Less than Significant Impact	■	■	□	No Impact
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forestland to non-forest use	Significant and Unavoidable Impact	■	■	□	No Impact

### a) Conversion of Farmland to nonagricultural use

The General Plan Update EIR included an analysis of the potential effects associated with General Plan buildout on agricultural resources. The General Plan Update EIR concluded that although the Planning Area is predominantly urban and built-up land, there are 473 acres of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance mapped by the California Department of Conservation FMMP within the Planning Area’s RUL line. While the proposed General Plan goals and policies would protect most of the farmland in the Planning Area from conversion to non-agricultural use, it is not guaranteed that farmland designated for uses other than agricultural would be preserved. Therefore, as described in Impact AF-1, the implementation of the 2040 General Plan would result in conversion of Farmland of Statewide Importance to non-agricultural use, and there are no mitigation measures that would reduce the impact.

The General Plan Update EIR (Impact AF-2) found that the Planning Area does not include any Williamson Act contract lands, and this impact would be less than significant. No areas within the Planning Area are currently zoned forest land, timberland, or Timberland Production Districts. Therefore, implementation of the 2040 General Plan would have no impact with respect to conflicts with existing zoning for forest land, timberland, or Timberland Production Districts in the Planning Area (Impact AF-3 and Impact AF-4). As implementation of the 2040 General Plan would only develop within the RUL and concentrate future development within the Focus Areas and other planned

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development sites, there would not be significant growth outside of these areas. The General Plan specifically contains policies to ensure that sufficient buffers and other considerations protect existing natural resources, including forest land, within the Planning Area and impact would be less than significant.

Implementation of the 2040 General Plan (Impact AF-5) has the potential to introduce non-agricultural uses such as higher density residential on or near farmland and convert agricultural uses of Farmland of Statewide Importance at the Big Ranch Road area to residential uses. While concentrated infill development within Focus Areas and other planned growth sites would reduce changes to existing environments adjacent to or near other existing farmland or forest land, and thereby reduce the likelihood of conversion of these lands to non-agricultural or non-forest use (respectively), the targeted objective of residential development in the Big Ranch Road area constitutes a significant and unavoidable impact, with no feasible mitigation measures.

### **Project Analysis**

The proposed Project consists of amending the pre-zoning for approximately 66 acres and annexing approximately 51.5 acres into the City that is planned for residential development by both the General Plan and the Napa County General. As noted, no development or construction is proposed as part of the Project. The proposed Project would not convert lands to non-agricultural use that are not already planned for such conversion by the City of Napa General Plan and the Napa County General Plan. Furthermore, only a portion of the lands within the Project Site are being used for agricultural/vineyard purposes. Moreover, the proposed Project would not terminate agricultural operations on properties where such uses are occurring since Napa Municipal Code Section 17.52.050 permits accessory agricultural activities on residentially zoned properties that are one acre or larger, and any future development within the Project Site would be required to comply with applicable GP policies and zoning code requirements related to the protection of existing agricultural operations. These findings are consistent with the findings and conclusions reached by the General Plan Update EIR, where the City determined that agricultural impacts would be significant and unavoidable and adopted a Statement of Overriding Considerations. Therefore, the Project would not result in any new significant impacts not already analyzed in the General Plan Update EIR or increase the severity of a significant impact as previously identified and analyzed in the General Plan Update EIR.

#### **b) Conflict with Existing Zoning or Williamson Act Contract.**

The General Plan Update EIR determined that there are no Williamson Act contracts within the Planning Area. Policies and goals associated with the 2040 General Plan intend to concentrate infill growth along major corridors, and the proposed land use designations associated with the General Plan maintain existing land use/zoning designations. Additionally, zoning would be updated to be consistent with the General Plan, as required by State law. Given that the General Plan supports agricultural uses as permitted by existing zoning and that the Planning Area does not include any Williamson Act contract lands, the General Plan Update EIR concluded that this impact would be less than significant, and no mitigation measures are required. Based on the foregoing analysis, the annexation would not result in any new significant impacts not already analyzed in the General Plan Update EIR or increase the severity of a significant impact as previously identified and analyzed in that EIR.

### **Project Analysis**

The potential environmental effects from development of the Project area up to the density allowed by the annexation and pre-zoning were adequately evaluated in Section 2.1.2 of the partial re-circulated Draft Environmental Impact Report (SCH No. 2021010255). As explained above, there are no conflicts with existing zoning or Williamson Act contracts.

#### **c) Conflict with Zoning of Forestland or Timberland.**

The General Plan Update EIR determined that no areas within the Planning Area are zoned as forest land, timberland, or Timberland Production Districts. Therefore, there would be no impact with result to conflicts with existing zoning for forest land, timberland, or Timberland Production Districts in the Planning Area.

### **Project Analysis**

The potential environmental effects from development of the Project area up to the density allowed by the annexation and pre-zoning were adequately evaluated in Section 2.1.2 of the partial re-circulated Draft Environmental Impact Report (SCH No. 2021010255). As explained above, the Project area does not contain any areas that are zoned for forest land or timberland.

#### **d) Result in the Loss of or Conversion of Forestland.**

The General Plan Update EIR determined that most of the existing forest land in the Planning Area is located within parks, open space, and natural areas such as along creeks, and Goals NRC-1 and NRC-3 and policies NRC 1-1, NRC 1-8, and NRC 4-3 of the General Plan protect these areas and the resources within them. Therefore, the General Plan Update EIR concluded that forest lands would be preserved to the greatest extent feasible, and impacts would be less than significant.

### **Project Analysis**

The potential environmental effects from development of the Project area up to the density allowed by the annexation and pre-zoning were adequately evaluated in Section 2.1.2 of the partial re-circulated Draft Environmental Impact Report (SCH No. 2021010255). As explained above, there are no areas designated as forestland, therefore there will be no conversion of forestland from implantation of the Project.

#### **e) Other Changes in the Existing Environment.**

The General Plan Update EIR determined that implementation of the 2040 General Plan has the potential to introduce non-agricultural uses such as higher density residential uses on or near farmland and that implementation of the General Plan would convert agricultural uses of Farmland of Statewide Importance to residential uses in some areas. While concentrated infill development within the Planning Area sites would reduce changes to existing environments adjacent to or near existing farmland or forest land and thereby reduce the likelihood of conversion of these lands to non-agricultural or non-forest use, the conversion of Farmland of Statewide Importance to residential uses constitutes a significant and unavoidable impact, with no feasible mitigation measures.

### **Project Analysis**

The potential environmental effects from development of the Project area up to the density allowed by the annexation and pre-zoning were adequately evaluated in Section 2.1.2 of the Partial Re-circulated Draft Environmental Impact Report (SCH No. 2021010255), where the City determined that impacts from other changes in the exiting environment would be significant and unavoidable and adopted a Statement of Overriding Considerations. Therefore, no further environmental analysis is required.

### **CEQA Conclusions**

The General Plan Update EIR adequately evaluated the agriculture and forestry impacts of the proposed project. The Proposed Project would be subject to the Medium Density Residential land use designation of the General Plan, which typically provides for single-family detached and attached housing types. General Plan Policies LUCD 24-1, 24-2 & 24-3 contain parameters that must be applied to future development of the Big Ranch Road area. These Policies will ensure the development would be compatible with surrounding land uses by requiring lower density transitions to rural edges and providing a smooth visual transition from the existing residential to higher density development. As a result, the Proposed Project would not introduce new or more severe impacts than what was previously analyzed in the General Plan EIR. No additional analysis is required. Potential impacts would

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be less than significant and additional mitigation is not required.

## Air Quality

Would the Project:	Napa 2040 General Plan Update EIR Findings	Relationship to Napa 2040 General Plan Update EIR Findings:			Project Conclu-
		Equal or Less Severe	Adequately Addressed in General Plan EIR	New or Substantially More Severe	Resulting Level of Significance
a) Conflict with or obstruct implementation of the applicable air quality plan	SU	■	■	□	LTS
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non- attainment under an applicable federal or state ambient air quality standard	SU	■	■	□	LTS
c) Expose sensitive receptors to substantial pollutant concentrations	SU	■	■	□	LTS
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people	LTS	■	■	□	LTS

### a) Conflicts with/Obstruction of the Applicable Air Quality Plan

The General Plan Update EIR determined that the General Plan would incorporate applicable control measures of the 2017 Clean Air Plan and would not disrupt or hinder implementation of any of these control measures. In addition, the General Plan Update EIR determined that the increase in vehicle trips associated with resident and service populations is lower than the rate of their projected increases. However, because implementation of the General Plan would result in an increase in criteria pollutant emissions, the General Plan Update EIR found that implementation of the General Plan would conflict with the primary goals of the 2017 Clean Air Plan. As identified in the General Plan Update EIR, given that the General Plan already includes policies that would help reduce impacts to the maximum extent feasible, implementation of the General Plan was determined to have a significant and unavoidable impact.

### Project Analysis

The proposed Project would consist of the annexation of 51.5 acres into the City of Napa boundaries that is planned for residential development by both the City of Napa General Plan and the Napa County General Plan. The effects from the Project’s potential to conflict with/obstruct the applicable air quality plan were adequately evaluated in Section 3.2.2 of the General Plan EIR, where the City determined that such effects would be significant and unavoidable and adopted a Statement of Overriding Considerations. Thus, the proposed annexation would not result in a substantial increase in future population beyond what is already assumed by the General Plan Update EIR for the Project Site. No development or construction is proposed as part of the Project.

### b) Cumulative Increase of Non-Attainment Criteria Pollutant Emissions

The General Plan Update EIR determined that future development allowed under the 2040 General Plan has the potential to violate air quality standards. The General Plan Update EIR also found that although future development projects within the City would be subject to the policies contained in the 2040 General Plan to reduce air quality emissions, and also would be required to comply with applicable SCAQMD rules, regulations, and permitting processes, implementation of the 2040 General Plan would result in increased operational-related vehicle miles travelled (VMT), which would result in increased emissions of criteria pollutants for which the region is non-attainment; operational emissions were disclosed as a significant and unavoidable impact of the 2040 General Plan, and a statement of overriding considerations was adopted.

### **Project Analysis**

The proposed Project consists of the pre-zoning for approximately 66 acres and the annexation of approximately 51.5 acres into the City of Napa boundaries that is planned for residential development by both the General Plan and the Napa County General Plan. No development or construction is proposed as part of the Project. The effects from the Project's potential to result in a cumulatively considerable net increase of non-attainment criteria pollutant emissions were adequately evaluated in Section 3.2.2 of the General Plan EIR, where the City determined that such effects would be significant and unavoidable and adopted a Statement of Overriding Considerations. After considerations, therefore no further environmental analysis is required.

#### **c) Exposure of Sensitive Receptors to Pollutant Concentrations**

The General Plan Update EIR established that the General Plan update would allow growth of residential land uses that would be new sensitive receptors and non-residential land uses that are a potential for new emissions sources, as well as increase traffic volumes that exacerbate existing mobile sources. Policies within the General Plan update would establish buffers between potential air pollution sources and sensitive receptors and limit pollution during construction. Other exposure reduction strategies including requirement of air filters, expansion of urban forestry, speed reduction, and traffic management, would minimize the General Plan's contribution to existing sources as well as protect future sensitive receptors. Future development would be subject to individual review; new sources would be evaluated through the BAAQMD permit process and/or the CEQA process to identify and mitigate any significant exposures. The General Plan's impact on sensitive receptors from exposure to substantial pollutant concentrations would thus be minimized to the maximum extent feasible. Nevertheless, uncertainty regarding the effects of individual projects allowed under the General Plan during construction and the cumulative contribution of operational emissions within an already-significant context would make the General Plan's impact with regard to exposure of sensitive receptors to pollutant concentrations significant and unavoidable overall.

### **Project Analysis**

The proposed Project consists of the pre-zoning for approximately 66 acres and the annexation of approximately 51.5 acres into the City of Napa boundaries that is planned for residential development by both the General Plan and the Napa County General Plan. No development or construction is proposed as part of the Project. Thus, the Project would not directly result in any impacts to the sensitive receptors. The residential uses allowed by the Medium Density Residential General Plan land use designation are not associated with the generation of substantial pollutant concentrations and are not associated with the generation of large truck traffic that could result in DPM emissions. The effects from the Project's potential exposure of sensitive receptors to pollutant concentrations were adequately evaluated in Section 3.2.2 of the General Plan EIR, where the City determined that such effects would be significant and unavoidable and adopted a Statement of Overriding Considerations. Therefore, the Project would not result in any new significant impacts not already analyzed in the General Plan Update EIR or increase the severity of a significant impact as previously identified and analyzed in the GP EIR.

#### **d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people**

The General Plan Update EIR determined that the General Plan did not propose any specific new sources of odor

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and that policies contained within the 2040 General Plan would ensure that sensitive uses would be separated from odor generating land uses; thus, the General Plan Update EIR concluded that impacts due to objectionable odors affecting a substantial number of people would be less than significant.

### Project Analysis

The proposed Project consists of the pre-zoning for approximately 66 acres and the annexation of approximately 51.5 acres into the City of Napa boundaries that is planned for residential development by both the General Plan and the Napa County General Plan. No development or construction is proposed as part of the Project. Potential future development within the Project Site would have the potential to result in air emissions leading to odors.. The potential effects relating to such emissions were adequately evaluated in Section 3.2.2 of the GP EIR and determined by the City to be less than significant. Therefore, no further environmental analysis is required.

### CEQA Conclusion

Based on the analysis, findings, and conclusions of the prior General Plan Update EIR, implementation of the Project would not substantially increase the severity of any significant impacts related to air quality as identified in the prior General Plan Update EIR, nor would it result in new significant impacts related to air quality that were not previously identified. The prior General Plan Update EIR did not identify any mitigation measures related to air quality that would apply to the Project, and none would be needed.

### Biological Resources

Would the Project:	Napa General Plan Update EIR Findings	Relationship to Napa General Plan Update EIR Findings:			Project Conclusions:
		Equal or Less Severe	Adequately Addressed in General Plan EIR	New or Substantially More Severe	Resulting Level of Significance
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service	LTS w/MM	■	■	□	No Impact
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service	LTS	■	■	□	No Impact
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means	LTS	■	■	□	No Impact

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d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites	LTS	■	■	□	No Impact
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance	NI	■	■	□	No Impact
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan	NI	■	■	□	No Impact

### a) Protected Plants and Wildlife.

The General Plan Update EIR determined that 28 special-status plant species and 20 special-status wildlife species have moderate or high potential to be in the Planning Area. Special-status plant and animal species and their potential habitat could be affected by future development under updated General Plan land use designations. However, planned changes in land use would be minimal as compared to existing land uses, and future development under the General Plan would occur primarily within previously disturbed areas; therefore, impacts on special-status plants and animals would not be substantial. Additionally, the General Plan includes goals and policies that emphasize the conservation and protection of biological resources (LUCD-1, NRC-1, NRC.1-1, NRC.1-2, NRC.1-3, NRC.1-4, NRC.1-5, NRC.1-6, NRC.1-8, NRC.1-9, NRC-2, NRC.2-2, NRC.2-3, NRC.2-4, NRC-4, NRC.4-1, NRC.4-2, NRC.4-3). Furthermore, future development would be subject to General Plan Update EIR Finding: The General Plan Update EIR found that the 2040 General Plan would have a less-than-significant impact to candidate, sensitive, and special status species because implementing projects within the City would be required to adhere review under CEQA and permitting requirements for impacts on special-status plants and animals. Therefore, the General Plan Update EIR concluded that implementation of the General Plan would result in less than significant impacts to special-status plant and animal species, and no mitigation is required.

The General Plan Update EIR determined that 11 special-status fish species have a moderate or high potential to be in the study area. Five of these fish species —fall-run Chinook salmon, steelhead, green sturgeon, and delta and longfin smelt—are listed as threatened or endangered under ESA or CESA. Special-status fish and their habitat could be affected by future development under updated General Plan land use designations. Planned changes in land use along the Napa River would be minimal in area as compared to existing land uses and land uses approved under the existing General Plan, and future development under the General Plan would occur primarily within previously disturbed areas. In addition, the General Plan includes several goals and policies that emphasize the conservation and protection of biological resources. Furthermore, future development would be subject to review under CEQA and permitting requirements for impacts on special-status fish. Therefore, the General Plan Update EIR concluded that implementation of the General Plan would result in less than significant impacts to special-status fish, and no mitigation is required.

### Project analysis

The proposed Project consists of the pre-zoning for approximately 66 acres and the annexation of approximately 51.5 acres into the City of Napa boundaries that is planned for residential development by both the General Plan and the Napa County General Plan No development or construction is proposed as part of the Project. The Projects’

potential effects on protected plants and wildlife were adequately evaluated in Section 3.3.2 of the General Plan EIR and determined by the City to be less than significant. Thus, the Project would not result in any significant impacts to sensitive or special status plant or animal species, and therefore no further environmental review is required.

### **b) Riparian Habitat or Other Sensitive Natural Community.**

The General Plan Update EIR determined that valley foothill riparian and sensitive oak woodland (blue oak, coast live oak, and valley oak) communities in the study area are primarily in parks or previously developed areas that would not be affected by General Plan land use changes. However, some riparian and oak woodland habitat in areas planned for development could be affected under the General Plan. Future development under the General Plan would occur primarily within previously disturbed areas. In addition, the General Plan includes goals and policies that emphasize the conservation and protection of biological resources (LUCD-1, LUCD.1-1, NRC-1, NRC.1-1, NRC.1-2, NRC.1-3, NRC.1-4, NRC.1-5, NRC.1-6, NRC.1-8, NRC.1-9, NRC-2, NRC.2-1, NRC-4, NRC.4-1, NRC.4-2, NRC.4-3). Furthermore, future development would be subject to review under CEQA and permitting requirements for impacts on oak woodlands and valley foothill riparian communities. Therefore, the General Plan Update EIR concluded that implementation of the 2040 General Plan would result in less than significant impacts to riparian habitat or other sensitive natural communities, and no mitigation is required.

### **Project analysis**

The proposed Project consists of the pre-zoning for approximately 66 acres and the annexation of approximately 51.5 acres into the City of Napa boundaries that is planned for residential land uses by the GP and the Napa County General Plan. development or construction would occur as part of the Project. The Projects' potential effects on riparian habitat or other sensitive natural communities were adequately evaluated in Section 3.3.2 of the General Plan EIR and determined by the City to be less than significant. Thus, the Project would not directly result in any significant impacts to riparian habitat or other sensitive natural communities, and therefore no further environmental review is required.

### **c) Federally Protected Wetlands.**

The General Plan Update EIR (Impact BIO-5) determined that implementation of the General Plan would not have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption or other means as state and federally protected wetlands and non-wetland waters (riverine, freshwater emergent wetlands, saltwater emergent wetlands) in the study area are primarily in conservation areas, parks or previously developed areas that would not be affected by General Plan update land use changes. Future development pursuant to the General Plan would be required to comply with General Plan goals and policies: Goal LUCD-1, Policies NRC.1-1, NRC.1-2, NRC.1-3, NRC.1-4, NRC.1-5, NRC.1-6, NRC.1-7, NRC.1-8, NRC.1-9, Policies NRC.2-1, NRC.2-2, NRC.2-3, NRC.2-4, Policies NRC.4-1, NRC.4-2 and NRC.4-3, which would prevent impacts to wetlands and non-wetland waters.

### **Project Analysis:**

No wetlands are known to exist within the Project Site, as the majority of wetlands occur within the southern portion of the City, while the Project Site is located along the City's northern boundary. No development or construction is proposed as part of the Project. Thus, the Project would not directly result in any impacts to State or federally protected wetlands. The proposed project would not result in any impacts related to wetlands that are new or more significant than those analyzed in the General Plan Update EIR.

### **d) Wildlife Movement Corridors.**

The General Plan Update EIR (Impact BIO-6) determined that implementation of the proposed land use changes and subsequent development under the General Plan update could interfere with the movement of native wildlife species, particularly in the south portion of the study area where an Essential Connectivity Area (ECA) has been identified

(Figure 3.3-2 of the General Plan EIR). Proposed land use designations would result in small areas of vineyard, grassland, oak woodland, and riverine areas that are within the designated ECA being converted to hospitality commercial and business park. However, future development pursuant to the General Plan would be required to comply with General Plan goals and policies: Goal LUCD-1, Policies NRC.1-1, NRC.1-2, NRC.1-3, NRC.1-4, NRC.1-5, NRC.1-6, NRC.1-7, NRC.1-8, NRC.1-9, Policies NRC.2-1, NRC.2-2, NRC.2-3, NRC.2-4, Policies NRC.4-1, NRC.4-2 and NRC.4-3, which would prevent impacts to wildlife corridors and movement. Therefore, the General Plan would not interfere substantially with the movement of native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors and could impede the use of wildlife nursery sites. Impacts are less than significant, and no mitigation measures are required.

### **Project Analysis**

The proposed Project consists of the pre-zoning for approximately 66 acres and the annexation of approximately 51.5 acres into the City of Napa boundaries. No development or construction would occur within the Project Site as part of the Project.

The Projects' potential effects on wildlife movement corridors were adequately evaluated in Section 3.3.2 of the General Plan EIR and determined by the City to be less than significant. Thus, the Project would not directly result in any significant impacts to wildlife movement corridors, and therefore no further environmental review is required.

#### **e) Local Policies and Ordinances.**

The General Plan Update EIR (Impact BIO-7) determined that implementation of the 2040 General Plan would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance and there would be no impact. Municipal Code Chapter 12.45, Trees on Private Property, requires preservation of significant trees and permitting for impacts on, or removal of, these trees. Municipal Code 16.36.110, Resource Areas, requires avoidance and mitigation for impacts on sensitive biological resources, including plants, wildlife, and habitats. Municipal Code 17.16.050, Special findings required for AR district projects, requires protection of natural resources within areas designated in the General Plan as a resource area. Municipal Code 17.52.110 Creeks and Other Watercourses, requires streambanks stabilization and setbacks to be part of new development for the protection and enhancement of riparian habitat corridors. Additionally, future development pursuant to the General Plan would be required to comply with General Plan goals and policies: Goal LUCD-1, Policies NRC.1-1, NRC.1-2, NRC.1-3, NRC.1-4, NRC.1-5, NRC.1-6, NRC.1-7, NRC.1-8, NRC.1-9, Policies NRC.2-1, NRC.2-2, NRC.2-3, NRC.2-4, Policies NRC.4-1, NRC.4-2 and NRC.4-3, which would expand existing City policies and ordinances to protect biological resources. Future development pursuant to the General Plan would be subject to these mandatory tree preservation requirements and would therefore not conflict with local policies or ordinances protecting biological resources. The General Plan Update EIR concluded that this impact would be less than significant.

### **Project Analysis**

The proposed Project consists of the pre-zoning for approximately 66 acres and the annexation of approximately 51.5 acres into the City of Napa that is planned for residential land uses by both the General Plan and the Napa County General Plan into the City of Napa boundaries. No new development or construction would be authorized with approval of the Project. All future development within the Project Site would be required to comply with all applicable provisions of the City of Napa Municipal Code, including all ordinances adopted for the purpose of protecting biological resources. Additionally, the City of Napa would review future development applications within the Project Site for compliance with all applicable General Plan policies, including those that were adopted to protect biological resources. Accordingly, the Project would not conflict with any local policies or ordinances protecting biological resources, and no impact would occur. Therefore, the Project would not result in any new significant impacts not already analyzed in the General Plan Update EIR or increase the severity of a significant impact as previously identified and analyzed in that EIR.

#### **f) Local, Regional, or State Habitat Conservation Plan.**

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The General Plan Update EIR (Impact BIO-8) determined that new development pursuant to the General Plan would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan or other approved local, regional, or State Habitat Conservation Plan as there are no HCPs or natural community conservation plans have been adopted in the study area or in Napa County.

### Project Analysis

The Project Site is not within an area covered by an adopted habitat conservation plan or natural community conservation plan. Therefore, the Project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or State Habitat Conservation Plan. Consistent with the findings of the General Plan Update EIR, the Project would not conflict with an adopted Habitat Conservation Plan or Natural Community Conservation Plan.

### CEQA Conclusion

Based on the analysis, findings, and conclusions of the General Plan Update EIR, implementation of the Project would not substantially increase the severity of any significant impacts to biological resources as identified in that prior EIR, nor would it result in new significant impacts related to biological resources that were not previously identified. The General Plan Update EIR did not identify any mitigation measures that apply to the Project. The General Plan Update EIR did identify regulatory requirements (Napa Municipal Code Chapter 12.45 Trees on Private Property) related to biological resources that would apply to the Project, and implementation of those mitigation measures and regulatory requirements would ensure the Project’s impacts to biological resources would remain less than significant.

### Cultural Resources

Would the Project:	Napa General Plan Update EIR Update Findings	Relationship to Napa General Plan Update EIR Findings:			Project Conclusions:
		Equal or Less Severe	Adequately Addressed in General Plan EIR	New or Substantially More Severe	Resulting Level of Significance
a) Cause a substantial adverse change in the significance of a historic resource pursuant to Section 15064.5	LTS	■	■	□	LTS
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5	LTS	■	■	□	LTS with RR
c) Disturb any human remains, including those interred outside of formal cemeteries	LTS	■	■	□	LTS with RR

#### a) Substantial Adverse Change in Significance of a Historic Resource

The General Plan Update EIR (Impact CUL-1) determined that implementation of the General Plan would not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5, as the General Plan update would not substantially alter City policies regarding the significance of impacts on historical resources. Furthermore, the General Plan update provides additional goals and policies intended to encourage rehabilitation, sensitive use adaptations, and flexible reuse to minimize adverse changes to historical resources. Policies HCR 1- 1,

HCR 1-2, and HCR 1-3, encourage the preservation and reuse of historic resources including using sustainable “green” building and rehabilitation practices and protection of historic resources, where possible. Policies HCR 2-1, HCR 2-2, HCR 2-3, and HCR 2-4 protect historic resources by ensuring surveys and records of existing and as-of-yet unknown resources are performed following state, federal, and private guidelines by qualified persons and are updated regularly. Historical resources are also protected under the regulations of the NHPA when projects involve federal agencies. Any projects with increased urban density, or the improvement of transportation networks would continue to require project-level review. Therefore, the impact of implementation of the General Plan update on historical resources would be less than significant with implementation of existing regulations and the proposed goals and policies.

### **Project Analysis**

The proposed Project consists of the pre-zoning for approximately 66 acres and the annexation of approximately 51.5 acres into the City of Napa boundaries. No new development or construction would occur in conjunction with the Project. The Projects’ potential effects on historic resources were adequately evaluated in Section 3.4.2 of the General Plan EIR and determined by the City to be less than significant. Thus, the Project would not directly result in any significant impacts to historic resources, and therefore no further environmental review is required. Therefore, the proposed project would not cause a substantial adverse change in the significance of a historical resource and there would be no impact. The proposed Project would not result in any impacts related to historical resources that are new or more significant than those analyzed in the General Plan Update EIR.

#### **b) Substantial Adverse Change in Significance of Archaeological Resources**

The General Plan Update EIR (Impact CUL-2) determined that implementation of the General Plan would not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5. The General Plan Update EIR concluded that new development could affect known or previously unidentified archaeological resources, but compliance with General Plan Goal HCR 14, Policy HCR 14-1 and Policy HCR-14-2 would reduce impacts to archaeological resources to less than significant, and no additional mitigation was indicated, as necessary.

### **Project Analysis**

The proposed Project consists of the pre-zoning for approximately 66 acres and the annexation of approximately 51.5 acres into the City of Napa boundaries. No new development or construction would be authorized with approval of the Project. . The Projects’ potential effects on archaeological resources were adequately evaluated in Section 3.4.2 of the General Plan EIR and determined by the City to be less than significant. Thus, the Project would not directly result in any significant impacts to archaeological resources, and therefore no further environmental review is required. The proposed project would not result in any impacts related to archaeological resources that are new or more significant than those analyzed in the General Plan FEIR.

#### **c) Disturb Human Remains**

The General Plan Update EIR (Impact CUL-3) determined that implementation of the 2040 General Plan could disturb human remains, including Native American burials. Excavation and construction may uncover human remains that may not be marked in formal burial locations. Under CEQA, human remains are protected under the definition of archaeological materials as being “any evidence of human activity.”

The General Plan Update EIR cites the section 7050.5 of the California Health and Safety Code as setting forth provisions related to the treatment of human remains, including the treatment of human remains found in locations other than a dedicated cemetery and the responsibilities of the coroner. These requirements apply to all

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construction projects. The General Plan Update EIR cites 5097.98, as amended by Assembly Bill 2641, which addresses the disposition of Native American burials, protects remains, and appoints the NAHC to resolve disputes.

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

### Project Analysis

The proposed Project consists of the pre-zoning for approximately 66 acres and the annexation of approximately 51.5 acres into the City of Napa boundaries. No development or construction would occur within the Project Site as part of the Project; The Projects’ potential effects on disturbed human remains were adequately evaluated in Section 3.4.2 of the General Plan EIR and determined by the City to be less than significant. Thus, the Project would not directly result in any significant impacts to disturbed human remains, and therefore no further environmental review is required. Therefore, the proposed project would not result in any new or more significant impacts related to historic resources than those analyzed in the General Plan FEIR.

### CEQA Conclusions

Based on the analysis, findings, and conclusions of the prior General Plan Update EIR, implementation of the Project would not substantially increase the severity of any significant impacts to cultural resources as identified in the General Plan Update EIR, nor would it result in new significant impacts to cultural resources that were not previously identified. The General Plan Update did not identify any additional mitigation measures related to cultural resources that would apply to the Project, and none would be needed.

### Energy

Would the Project:	Napa General Plan Update EIR Findings	Relationship to Napa General Plan Update EIR Findings:			Project Conclusions:
		Equal or Less Severe	Adequately Addressed in General Plan EIR	New or Substantially More Severe	Resulting Level of Significance
a) Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation	LTS	■	■	□	LTS
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency	LTS	■	■	□	LTS

**a) Would the Project result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?**

The General Plan Update EIR (Impact ENE-1) found that the consumption of energy resources during both construction and operation of new development under the General Plan would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources.

### *Construction*

The General Plan Update EIR found that construction activities associated with individual development projects would consume energy in the form of diesel and gasoline for heavy-duty, off-road equipment and on-road vehicles. The General Plan Update EIR determined that future construction would be typical of most land use developments within the Planning Area and would represent a temporary demand for local and regional fuel supplies that would be easily accommodated. Future construction would also be required to comply with the goal of 100 percent zero-emission off-road vehicles and equipment by 2035 where feasible established in Executive Order N-79-20. Therefore, the General Plan Update EIR concluded that construction activities associated with the General Plan update would not result in wasteful, inefficient, or unnecessary consumption of energy, and this impact was found to be less than significant.

### *Operations*

The General Plan Update EIR found that new development would consume gasoline and diesel for vehicle trips and electricity and natural gas for power, heating, and cooking. The General Plan Update EIR determined that even with an increase in development, the total energy consumption would be expected to decrease as a result of the high renewable energy goals of the energy providers and stricter fuel efficiency standards. In addition, the General Plan update goals and policies within the Climate Change and Sustainability Element aimed at reducing energy consumption through increasing energy efficiency and renewable energy, encouraging bicycle and pedestrian transit, decreasing car use by tourists, etc. Therefore, the General Plan Update EIR concluded that operation of future land uses associated with the General Plan update would not result in wasteful, inefficient, or unnecessary consumption of energy, and this impact was found to be less than significant.

### **Project Analysis**

The proposed Project consists of the pre-zoning for approximately 66 acres and the annexation of approximately 51.5 acres into the City of Napa boundaries. No development or construction would be authorized with approval of the Project; however, the Project Site could be developed with residential land uses in the future as planned by the GP. Potential future construction activities within the Project Site would be subject to applicable State regulations designed to minimize air pollutants associated with construction activities, which in turn also serve to reduce energy consumption. Therefore, the Project would not result in any new significant impacts not already analyzed in the General Plan Update EIR or increase the severity of a significant impact as previously identified and analyzed in the GP EIR.

#### **b) Conflicts with/Obstruction of Plans for Renewable Energy/Energy Efficiency**

The General Plan Update EIR (Impact ENE-2) found that future development under the General Plan would be required to comply with the latest California Building Code requirements, including the CALGreen energy efficiency standards of Title 24, as well as all federal, state, and local rules and regulations pertaining to energy consumption and conservation. In addition, the General Plan update includes policies that emphasize energy reduction strategies and does not contain policies that would conflict with existing energy conservation regulations. General Plan update policies would also support GHG emissions reduction targets through measures that would reduce VMT. Accordingly, the General Plan Update EIR concluded that future development under the General Plan would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and impacts would be less than significant.

### **Project Analysis**

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The proposed Project consists of the pre-zoning for approximately 66 acres and the annexation of approximately 51.5 acres into the City of Napa boundaries. No development or construction would occur within the Project Site as part of the Project; however, Residential land uses already are anticipated by the General Plan. Future development within the Project Site would be subject to all applicable State and local policies, regulations, and plans related to energy or energy efficiency, and there are no components of the proposed Project that have the potential to conflict with such policies, regulations, or plans. No impact would occur. Therefore, the Project would not result in any new significant impacts not already analyzed in the 2040 General Plan EIR or increase the severity of a significant impact as previously identified and analyzed in the GP EIR.

### CEQA Conclusions

The General Plan Update EIR adequately evaluated the energy impacts of the proposed project. Therefore, potential impacts would be less than significant and additional mitigation is not required.

### Geology and Soils

Would the Project:	Napa General Plan Update EIR Findings	Relationship to Napa General Plan Update EIR Findings:			Project Conclusions:
		Equal or Less Severe	Adequately Addressed in General Plan EIR	New or Substantially More Severe	Resulting Level of Significance
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death, involving: i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning map issued by the State Geologist for the area or based on other substantial evidence of a known fault ii. Strong seismic ground shaking iii. seismic-related ground failure, including liquefaction iv. Landslides	LTS	■	■	□	LTS
b) Result in substantial soil erosion or the loss of topsoil?	LTS	■	■	□	LTS
c) be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	LTS	■	■	□	LTS
d) Be located on expansive soil as defined in Table 18-1-B of the Uniform Building Code (1994), or other soils conditions creating substantial direct or indirect risks to life or property?	LTS	■	■	□	LTS

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e) Have soils that are incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	NI	■	■	□	No Impact
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	LTS w/MM	■	■	□	LTS

### a) Directly or Indirectly Create Risks Related to Seismic Hazards

The General Plan FIER determined that the West Napa fault zone crosses the western portion of the General Plan's Planning Area. However, development conducted under the General Plan would not increase seismic stresses by either introducing a substantial load to seismic faults or by introducing a lubricant, such as water in a reservoir, thereby exacerbating risk of surface fault rupture, strong seismic ground shaking, seismic-related ground failure, or seismic-related landslide. In addition, Policy SN 1-1 of the General Plan would require setbacks from seismic hazards, especially in areas that are prone to earthquakes and landslides. Policy SN 1-3 of Goal SN-1 of the General Plan would require that a geotechnical report be prepared, and its mitigation measures be incorporated into the design. These policies would be implemented through the regulation and development review process, which requires that all construction comply with the CBC. Therefore, the General Plan Update EIR concluded that impacts would be less than significant.

#### Project Analysis

There are no mapped faults within or adjacent to the Project site, and the project site is not located within an Alquist-Priolo zone. Therefore, the proposed Project would not directly or indirectly cause substantial adverse effects related to fault rupture and there would be no impact. The proposed Project would not result in any impacts related to fault rupture, seismic-related ground failure, or landslide that are new or more significant than those analyzed in the General Plan Update EIR.

### b) Erosion/Loss of Topsoil.

The General Plan Update EIR determined that ground-disturbing earthwork associated with future construction under the General Plan may increase erosion rates, potentially causing accelerated erosion. However, Section 8.36.120 of the City's Municipal Code requires compliance with the City's grading ordinance and NPDES permit, ensuring preparation of a SWPPP and issuance of a grading permit for all construction projects, as required by the San Francisco Bay Regional Water Board and the City's Municipal Code. Therefore, the General Plan Update EIR concluded that compliance with existing federal and local erosion-related regulations would ensure that construction activities as a result of the implementation of the General Plan would result in less than significant impacts to erosion.

#### Project Analysis

As the proposed Project does not involve any development or construction, it would not result in any impacts related to erosion that are new or more significant than those analyzed in the General Plan Update EIR. The Projects' potential effects relating to erosion and loss of topsoil were adequately evaluated in Section 3.6.2 of the General Plan EIR and determined by the City to be less than significant. Thus, the Project would not directly result in any significant impacts to erosion and loss of topsoil, and therefore no further environmental review is required.

### c) Unstable Geologic Unit

The General Plan Update EIR determined that construction in areas with the potential to exacerbate risk of nonseismic-related land sliding caused by heavy precipitation or improper grading or cuts could also expose people or structures to potential substantial adverse effects. However, the Planning Area is fairly level; moreover, Policy S-3.2 of the General Plan would require that a geotechnical report be prepared, and its mitigation measures be incorporated into the design. The General Plan Update EIR determined that subsidence has not occurred in the General Plan's Planning Area. Furthermore, future development under the General Plan would not include groundwater extraction or substantial dewatering that would result in subsidence. Therefore, the General Plan FIER concluded that construction activities as a result of the implementation of the General Plan would result in less than significant impacts related to unstable soils.

### **Project Analysis**

The Projects' potential effects relating to the potential for development to occur on an unstable geologic unit were adequately evaluated in Section 3.6.2 of the General Plan EIR and determined by the City to be less than significant. Thus, the Project would not directly result in any significant impacts to unstable geologic units, and therefore no further environmental review is required. As the proposed Project does not involve any development or construction, it would not result in any impacts related to unstable soil that are new or more significant than those analyzed in the General Plan Update EIR.

#### **d) Expansive Soils.**

The General Plan Update EIR determined that expansive soils occur in the General Plan's Planning Area, and structures built on expansive soils would be subject to the expansion and contraction of these soils, which could cause structural damage if the subsoil, drainage, and foundation are not properly engineered. However, soil sampling and treatment procedures for expansive soils, as well as other soil-related issues, are addressed by the California Building Code (CBC), and compliance with the CBC would create conditions suitable for construction. Therefore, the General Plan Update EIR concluded that impacts related to expansive soil would be less than significant.

### **Project Analysis**

The Projects' potential effects relating to the potential for development to occur on expansive soils were adequately evaluated in Section 3.6.2 of the General Plan EIR and determined by the City to be less than significant. Thus, the Project would not directly result in any significant impacts related to expansive soils, and therefore no further environmental review is required. As the proposed Project does not involve any development or construction, it would not result in any impacts related to expansive soils that are new or more significant than those analyzed in the General Plan Update EIR.

#### **e) Septic Tanks/Wastewater Disposal.**

The General Plan Update EIR determined that improperly located or designed septic systems could cause water quality issues and most soils in the General Plan's Planning Area are not suitable for use of septic tanks or alternative wastewater disposal systems. However, Napa Sanitation District owns and operates the sanitary sewer collection system and wastewater treatment plant that serves the City and all future development under the General Plan would be served by Napa Sanitation District and would not involve installation of septic systems or other alternative wastewater disposal systems. Therefore, the General Plan Update EIR concluded that there would be no impact.

### **Project Analysis**

The Projects' potential effects relating to the potential for development to occur where septic systems are located were adequately evaluated in Section 3.6.2 of the General Plan EIR and determined by the City to be less than significant. Thus, the Project would not directly result in any significant impacts related to potential contamination related to existing septic systems or alternate, and therefore no further environmental review is required. As the proposed Project does not involve any development or construction, it would not result in any impacts related to

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wastewater disposal. Future residential units would require abandonment of existing septic systems and include connections to the Napa Sanitation District’s wastewater conveyance system. The proposed Project would not result in any impacts related to septic tanks and wastewater disposal that are new or more significant than those analyzed in the General Plan Update EIR.

### f) Paleontological Resources.

The General Plan Update EIR determined that the surficial Holocene deposits in the General Plan’s Planning Area have a low sensitivity for paleontological resources, but the Sonoma Volcanics and Great Valley Sequence present in the margins of Napa are highly sensitive for paleontological resources. If fossils are present where development is planned, they could be damaged by earth-disturbing activities during construction, such as excavation for foundations, placement of fills, trenching for utility systems, and grading for roads and staging areas. However, Implementation of Mitigation Measure (MM) GEO-6 would reduce the potential impact on paleontological resources by requiring worker awareness training for any projects that would disturb previously undisturbed geologic units with high paleontological sensitivity, a stop-work order within 25 feet of the paleontological resources find, and development of a Paleontological Mitigation and Monitoring Plan (PMMP) if the Qualified Paleontologist determines that the find is important to the scientific record. The General Plan Update EIR concluded that impacts would be less than significant with mitigation due to the implementation of MM GEO-6.

### Project Analysis

The Projects’ potential effects relating to paleontological resources were adequately evaluated in Section 3.6.2 of the General Plan EIR and determined by the City to be less than significant. Thus, the Project would not directly result in any significant impacts to paleontological resources, and therefore no further environmental review is required. As the annexation does not involve any development or construction, the proposed Project would not result in any impacts related to paleontological resources that are new or more significant than those analyzed in the General Plan FEIR.

### CEQA Conclusions

The General Plan Update EIR adequately evaluated the potential impacts related to geology and soils resulting from the proposed Project. Therefore, potential impacts would be less than significant and additional mitigation is not required.

### Greenhouse Gas Emissions

Would the Project:	Napa 2040 General Plan Update EIR Findings	Relationship to Napa 2040 General Plan Update EIR Findings:			Project Conclusions:
		Equal or Less Severe	Adequately Addressed in General Plan EIR	New or Substantially More Severe	Resulting Level of Significance
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment				☐	
<ul style="list-style-type: none"> <li>• Construction</li> <li>• Operation</li> </ul>	LTS SU	■ ■	■ ■		LTS LTS

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b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases	SU	■	■	□	LTS
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**a) Generation of Greenhouse Gas Emissions.**

As discussed in the General Plan Update EIR, quantified estimates of the General Plan’s operational emissions would result in a significant impact. The General Plan Update EIR also found that unquantified construction emissions would further contribute to the overall total, though qualitatively less-than-significant when considered alone. As such, the General Plan Update EIR determined that would be necessary to adopt a climate action plan as a Qualified GHG Reduction Strategy in order to ensure that the City and the General Plan, if adopted, would further the State’s and region’s GHG reduction goals. General Plan Policy CCS 1-5 would require the City to work with BAAQMD and other relevant agencies and partners to adopt a climate action plan as a Qualified GHG Reduction Strategy to address the GHG reduction goals of EO B-55-18, Senate Bill (SB) 32, and EO S-03-05. The General Plan Update EIR concluded that implementation of this policy would lower the project’s impacts below both BAAQMD’s current and proposed plan-level significance thresholds for GHG. However, the General Plan Update EIR determined that because implementation of this policy (i.e., adoption of a Qualified GHG Reduction Strategy) cannot be guaranteed, impacts would be significant and unavoidable.

**Project Analysis**

The Projects’ potential effects relating to the generation of greenhouse gas emissions were adequately evaluated in Section 3.7.2 of the General Plan EIR and determined by the City to be significant and unavoidable, and the City adopted a Statement of Overriding Considerations. Therefore, no further environmental review is required. As the proposed Project does not involve any development or construction, it would not result in any impact. The proposed Project would not result in any construction related GHG impacts that are new or more significant than those analyzed in the General Plan Update EIR.

**b) Consistency with Greenhouse Gas Reduction Plans.**

The General Plan Update EIR determined that the General Plan Update includes numerous policies that support all applicable Plan Bay Area strategies, and proposed policies would achieve net reductions in GHG emissions and otherwise implement a Qualified GHG Reduction Strategy to meet targets established by EO S-3-05 and EO B-55-18. However, due to the scale of emissions reductions needed to comply with these targets and given that adoption of a Qualified GHG Reduction Strategy cannot be guaranteed, the General Plan Update EIR found that this impact would be significant and unavoidable.

**Project Analysis**

The Projects’ potential effects relating to its consistency with greenhouse gas reduction plans were adequately evaluated in Section 3.7.2 of the General Plan EIR and determined by the City to be significant and unavoidable, and therefore adopted a Statement of Overriding Considerations. Therefore, no further environmental review is required. As the proposed Project does not involve any development or construction, it would not result in any impact. Therefore, the proposed Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHG emissions. The proposed Project would not result in any impacts that are new or more significant than those analyzed in the General Plan Update EIR.

**CEQA Conclusion**

The General Plan Update EIR adequately evaluated the greenhouse gas emissions impacts of the proposed Project. Therefore, potential impacts would be less than significant, and additional mitigation is not required.

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### Hazards and Hazardous Materials

Would the Project:	Napa 2040 General Plan Update EIR Findings	Relationship to Napa 2040 General Plan Update EIR Findings:			Project Conclusions:
		Equal or Less Severe	Adequately Addressed in General Plan EIR	New or Substantially More Severe	Resulting Level of Significance
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials	LTS	■	■	□	LTS
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment	LTS	■	■	□	LTS
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school	LTS	■	■	□	LTS
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment	LTS	■	■	□	LTS
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area	LTS	■	■	□	No Impact
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan	LTS	■	■	□	LTS
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires	LTS	■	■	□	No impact

#### a) Create a Hazard Through Routine Transport, Use or Disposal of Hazardous Materials

The General Plan Update EIR determined that future land use changes and development under the General Plan involve, or could involve, the transport, use, storage, generation, and disposal of hazardous materials, including lead

and asbestos from building materials, chemicals from commercial uses, or fertilizers and pesticides from agricultural uses. Hazardous materials are regulated by the Napa County Planning Building and Environmental Services under state and federal laws and regulations, including DTSC, which regulates the generation, transport, and disposal of hazardous waste, and the State Water Resources Control Board, which enforces the Clean Water Act and protects the quality of ground and surface waters. Routine transport of hazardous materials on State Routes 29 and 121 is regulated and monitored by USDOT, Caltrans, and the California Highway Patrol. Agricultural transport and use of pesticides, which takes place on most agricultural use-designated land within and adjacent to the Planning Area, is regulated by CCR Title 3, which mitigates risks of hazard through routine use. Additionally, General Plan Policy SN 2-1 promotes the cleanup of hazardous sites and safe disposal of hazardous materials in the City, and Policy SN 2-2 would require the City to evaluate new uses that rely extensively on the use of hazardous materials to weigh their public health risks against their benefit. General Plan Policies SN 2-3 and SN-6.3 address the education of Napa households regarding LUSTs and natural hazards and safety procedures. Therefore, the General Plan Update EIR concluded that the requirements of existing regulatory programs combined with implementation of General Plan policies would reduce potential impacts of routine transport, use, or disposal of hazardous materials and reasonably foreseeable upset or accident conditions to a less-than-significant level.

### **Project Analysis**

The Projects' effects relating to its potential to create a hazard through routine transport, use or disposal of hazardous materials were adequately evaluated in Section 3.8.2 of the General Plan EIR and determined by the City to be less than significant. Thus, the Project would not directly result in any significant impacts relating to its potential to create a hazard through routine transport, use or disposal of hazardous materials, and therefore no further environmental review is required. The proposed Project consists of the pre-zoning for approximately 66 acres and the annexation of approximately 51.5 acres into the City of Napa boundaries. No development or construction would occur within the Project Site as part of the Project; therefore, the proposed Project would not result in any impacts related to the transport, use, storage, or disposal of hazardous materials that are new or more significant than those analyzed in the General Plan Update EIR.

#### **b) Create a Hazard Through Hazardous Materials Accident**

The General Plan Update EIR (impact HAZ-2) concluded that implementation of the General Plan would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment. The General Plan Update EIR found that compliance with mandatory regulations would reduce all potential construction-related impacts to a less than significant level, and that those laws would be enforced at all construction sites. Additionally, the handling and disposal of these materials would be governed according to regulations enforced by the Napa Fire Department, CUPA, Cal/OSHA, and DTSC. In addition, regulations under the federal Clean Water Act require contractors to avoid allowing the release of materials into surface waters as part of their SWPPP and National Pollutant Discharge Elimination System (NPDES) permit requirements. The General Plan Update EIR concluded that compliance with the existing regulatory scheme would be required for all future development to avoid or minimize impacts related to the release of hazardous materials into the environment, this impact would be less than significant, and no mitigation is required.

### **Project Analysis**

The proposed Project consists of the pre-zoning for approximately 66 acres and the annexation of approximately 51.5 acres into the City of Napa boundaries. The Projects' effects relating to its potential to create a hazard through hazardous materials accidents were adequately evaluated in Section 3.8.2 of the General Plan EIR and determined by the City to be less than significant. Thus, the Project would not directly result in any significant impacts relating to its potential to create a hazard through hazardous materials accidents, and therefore no further environmental review is required. No development or construction would occur within the Project Site as part of the Project; therefore, this impact would be less than significant, and the proposed Project would not result in any impacts related to the release of hazardous materials into the environment that are new or more significant than those analyzed in the

General Plan Update EIR.

### **c) Release Hazardous Emissions near a School**

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

### **Project Analysis**

The Project Site is approximately 0.1 mile from Vintage High School. However, compliance with federal, state, and local regulations for the management of hazardous materials as discussed above would ensure that potential impacts to nearby schools associated with hazardous materials emissions and use at the project site would be less than significant. The proposed Project would not result in any impacts related to the emission of hazardous materials within 0.25 miles of a school that are new or more significant than those analyzed in the General Plan Update EIR.

### **d) Located on a Site on the Cortese List**

The General Plan Update EIR (Impact HAZ-4) stated that no hazardous material release sites have been identified on the most recent Cortese List in the Planning Area. There are six open LUST sites, 21 cleanup sites, and six SWIS sites in the Planning Area. The Planning Area is not located on a Superfund or other NPL site; therefore, it would not result in a significant hazard to the public or the environment through exposure to such sites. All future projects would be required to be consistent with the General Plan update and would be subject to environmental review under CEQA. The General Plan update would not change existing provisions regarding hazardous material sites. Existing regulations would ensure that sites containing hazardous materials be cleaned up to existing standards for the proposed land use prior to development. The impact is less-than-significant, and no mitigation is required.

### **Project Analysis**

The Project Site is not included on any list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, 19 and no impact would occur. The proposed Project would not result in any impacts related to a hazardous material site pursuant to Government Code Section 65962.5 that are new or more significant than those analyzed in the General Plan Update EIR.

### **e) Exposure to Airport-Related Safety or Excessive Noise Hazards**

The General Plan Update EIR determined that the closest public airport is the Napa County Airport located approximately 5 miles south of the City of Napa, outside the perimeter of the General Plan's Planning Area. The very southern portions of the Planning Area are in Zones D and E of the ALUCP. In Zone D, aircraft can range from 300 to 1,000 feet above the ground, and residential uses, as well as uses hazardous to flights, are prohibited in this zone. Finally, in Zone E, the zone farthest from the airport, there is a low risk of accident, and noise impacts are much less and classified as overflight annoyance. The only prohibited uses in this zone are noise-sensitive outdoor uses. Overflight easements or deed notices may be required for other development uses in this zone. The General Plan Update EIR

concluded that implementation of the General Plan would not change any of the land uses within the ALUP or otherwise alter safety conditions for people within the Planning Area. The impact is less than significant, and no mitigation is required.

### **Project Analysis**

The Project Site is located approximately 7.5 miles north of the Napa County Airport. The Project Site is not located within the airport impact area or subject to any development conditions per the ALUPC. Therefore, the proposed Project would not result in a safety hazard to people working or residing in the area due to the proximity of an airport, and there would be no impact. The proposed Project would not result in any impacts related to aviation hazards that are new or more significant than those analyzed in the General Plan Update EIR.

#### **f) Impair or Interfere with Emergency Response Plan or Emergency Evacuation Plan**

The General Plan Update EIR (Impact HAZ-6) determined that new land uses and increased densities, has the potential to create obstacles to the implementation of emergency response or evacuation plans adopted for the City of Napa. Relevant emergency response or evacuation plans in the Planning Area include the Napa County Emergency Operations Plan and the Napa County Operational Area Hazard Management Plan. Several General Plan policies and implementing actions address the reduction of risk due to hazards, which, in turn, reduces the impact of new development on emergency response plans. Policy SN 5-1 advises implementing best practices to aggressively address wildfire prevention on open space land. Policy SN 5-2 facilitates communication and education to the community on fire safety, wildland fire protection measures, and evacuation/emergency response to wildland fires. Policy SN 5-4 ensures that future development plans provide adequate evacuation routes. Policy SN 5-5 would require that the City regularly assess adequacy of emergency response and evacuation routes and identify need for road extensions to serve neighborhoods that do not have sufficient evacuation routes or access for emergency services. Adherence to existing regulations and the policies in the General Plan update would reduce this impact to less than significant, and no mitigation is required.

### **Project Analysis**

The proposed Project consists of the pre-zoning for approximately 66 acres and the annexation of approximately 51.5 acres into the City of Napa boundaries. No development or construction would occur within the Project Site as part of the Project. The Projects' potential effects relating to Impairing or Interfering with an Emergency Response Plan or Emergency Evacuation Plan were adequately evaluated in Section 3.8.2 of the General Plan EIR and determined by the City to be less than significant. Thus, the Project would not directly result in any significant impacts relating to it's potential to Impair or Interfere with an Emergency Response Plan or Emergency Evacuation Plan, and therefore no further environmental review is required. As such, the proposed Project would not alter or block adjacent roadways, and implementation of the proposed project would not be expected to impair the function of nearby emergency evacuation routes. The proposed Project would have a less than significant impact on the implementation of an adopted emergency response plan or emergency evacuation plan. The proposed Project would not result in any impacts related to emergency response or evacuation plans that are new or more significant than those analyzed in the General Plan Update EIR.

#### **g) Expose People or Structures to Wildland Fires**

The General Plan Update EIR determined that CAL FIRE has designated the General Plan's Planning Area as NON-VHFHSZ. This indicates that the Planning Area is a non-very high fire hazard severity zone, and that the probability of a wildfire affecting the incorporated City is very low. The western and southeastern borders of the Planning Area are adjacent to moderate fire hazard severity zones, while the remaining northern, eastern, and southern portions of the Planning Area are undesignated. Implementation of the General Plan could create a significant impact if future development were located in areas that exacerbated the potential wildfire risk. However, Chapter 15.04.010 of the City of Napa Municipal Code adopts the California Fire Code as amended, which regulates fire safety for existing and new construction. The California Strategic Fire Plan also reduces the fire risk of new

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development by focusing on fire suppression and prevention efforts, including hazard and risk assessment, land use planning, cooperation between fire protection jurisdictions, fire-resistant development, and postfire recovery efforts. Furthermore, the General Plan includes various policies that address potential fire hazards (Policies SN 5-1, SN 5-2, SN 5-3, SN 5-4, SN 5-5, and SN 5-6). The General Plan Update EIR concluded that implementation of these policies, combined with the CBC standards and the review of all new structures and land uses in the Planning Area by the Napa Fire Department, would ensure that hazards from wildfire associated with future development would be less than significant, and no mitigation is required.

### Project Analysis

The Project Site is in a suburban area and is not within or adjacent to a wildland fire hazard area. Therefore, the Project would not introduce new or more severe impacts than what was previously analyzed in the General Plan EIR and thus no additional analysis is required. CEQA Conclusion

The General Plan Update EIR adequately evaluated the potential hazards and hazardous materials impacts of the proposed Project. Therefore, potential impacts would be less-than-significant and additional mitigation is not required.

### Hydrology and Water Quality

Would the Project:	Napa General Plan Update EIR Findings	Relationship to Napa General Plan Update EIR Findings:			Project Conclusions:
		Equal or Less Severe	Adequately Addressed in General Plan EIR	New or Substantially More Severe	Resulting Level of Significance
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality	LTS	■	■	□	LTS
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin	LTS	■	■	□	LTS
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation, substantially increase the rate or amount of surface runoff in a manner which would result in flooding, create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems; or impede or redirect flood flows	LTS	■	■	□	LTS

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d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation	LTS	■	■	□	No Impact
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	LTS	■	■	□	LTS

**a) Water Quality Standards.**

The General Plan Update EIR determined that project construction activities subsequent to the General Plan could result in short-term water quality degradation associated with soil erosion and subsequent sediment transport to adjacent properties, roadways, or watercourses via storm drains. Construction activities could also generate dust, settlement, litter, oil, and other pollutants that could temporarily contaminate water runoff from a construction site. However, projects that would disturb more than 1 acre of land are required to prepare a SWPPP as part of compliance with the NPDES Construction General Permit. The SWPPP would emphasize standard temporary erosion control measures to reduce sedimentation and turbidity of surface runoff from disturbed areas within the General Plan’s Planning Area. If dewatering for an individual project site is required, the SWPPP would include a dewatering plan, which would establish measures to prevent and minimize sediment and contaminant releases into groundwater during excavation. Dewatering activities would be required to comply with the NPDES Construction General Permit, San Francisco Bay Regional Water Board Waste Discharge Requirements for discharges of groundwater (Order No. R2-2018-0026), and local dewatering requirements to prevent potential water quality impacts on surface waters or ensure proper treatment measures are implemented prior to discharge. Additionally, construction projects would comply with other federal and State regulations, City standards, and other local ordinances. Therefore, the General Plan Update EIR concluded that potential construction-related water quality impacts, such as violations of water quality objectives, would be less than significant.

The General Plan Update EIR determined that implementation of the General Plan would accommodate about 7,811 new housing units and up to 3,784,298 square feet of commercial and industrial uses. The intensification of land uses by implementation of the General Plan may increase impervious surface area and introduce new or additional pollutants to an existing area. Any increase in impervious areas that may occur as a result of the General Plan would increase the volume of runoff during a storm, which would more effectively transport pollutants generated during operation into receiving waters. In addition, as the amount of impervious surface and runoff increases, less water would be able to infiltrate into the ground, and the velocity of flows to nearby waterbodies would be increased. However, the City of Napa’s MS4 system often requires retention of runoff to avoid increasing downstream creek flows and associated erosion. The San Francisco Regional Water Quality Control Board also requires treatment of stormwater runoff for new developments, utilizing Low Impact Development measures to treat and infiltrate stormwater runoff prior to discharging into waterways. Additionally, the General Plan includes implementation programs that would improve stormwater management in the City and reduce impacts on water quality (Policies NRC.10-6, CSS 3-2.) Therefore, the General Plan Update EIR concluded that potential operation related water quality impacts would be less than significant.

**Project Analysis**

The proposed Project consists of the pre-zoning for approximately 66 acres and the annexation of approximately 51.5 acres into the City of Napa boundaries. No development or construction would occur within the Project Site as part of the Project; therefore, the proposed Project would not result in any impacts related to water quality standards or waste discharge requirements that are new or more significant than those analyzed in the General Plan Update EIR.

**b) Decrease Groundwater Supplies and Groundwater Recharge**

The General Plan Update EIR (Impact HYD-2) concluded that new development pursuant to the General Plan would

not substantially decrease groundwater supplies or interfere substantially with groundwater recharge, and the General Plan would not impede sustainable groundwater management of the basin. Development pursuant to the General Plan could lead to an increased demand for water. Subsequent development pursuant to the General Plan could also result in an increase in impervious surfaces, which could reduce stormwater and rainwater infiltration. However, the City does not rely on groundwater and would continue to meet water supply demands from three surface water sources: Lake Hennessey, Milliken Reservoir, and the State Water Project. Therefore, future development pursuant to the General Plan was not found to substantially interfere with groundwater recharge or impede groundwater management of the basin, and this impact was determined to be less than significant.

### **Project Analysis**

The proposed Project consists of the pre-zoning for approximately 66 acres and the annexation of approximately 51.5 acres into the City of Napa boundaries. No development or construction would occur within the Project Site as part of the Project; therefore, the Project would not substantially interfere with groundwater recharge or impede groundwater management of the basin, and this impact would be less than significant. The Projects' potential effects relating to groundwater supplies and groundwater recharge were adequately evaluated in Section 3.9.2 of the General Plan EIR and determined by the City to be less than significant. Thus, the Project would not directly result in any significant impacts relating to its potential effects relating to groundwater supplies and groundwater recharge, and therefore no further environmental review is required.

#### **c) Alter Existing Drainage Patterns**

The General Plan Update EIR (Impact HYD-3) concluded that construction, site grading, trenching, and other activities could concentrate and redirect existing runoff patterns that could lead to erosion of temporarily exposed areas of bare soil during rainfall events with subsequent sedimentation onsite or offsite. The extent of the impact would depend on soil erosion potential, type of construction practice, extent of disturbed area, timing of precipitation events, and topography and proximity to drainage channels. However, compliance with grading permits and the NPDES Construction General Permit would require use of BMPs to restrict soil erosion and sedimentation and restrict non-stormwater discharges from construction sites as well as release of hazardous materials. As a performance standard, selected construction BMPs would represent the best available technology that is economically achievable and the best conventional pollutant control technology to reduce pollutants. Therefore, this impact is less than significant impacts, and no mitigation is required.

General Plan policies increase the emphasis on stormwater runoff reduction measures related to new development. As described in General Plan Policy NRC.10- 6, green infrastructure and sustainability strategies would be incorporated for new development in order to reduce stormwater runoff. Additionally, as described in General Plan Policy CSS 3-2, the City would require stormwater management techniques that minimize surface water runoff in public and private developments. General Plan Policy NRC.10-3 would require the preservation of natural drainage courses in their state whenever feasible. General Plan Policy CSPR 6-3 would require the City to develop and maintain an environmentally sensitive drainage system for handling runoff due to seasonal rainstorms. General Plan Policy SN 3-2 would require the City to update the Storm Drain Master Plan, focusing on condition assessment and needed repairs, storm drain capacity improvements, and consistency with the Napa River-Napa Creek Flood Protection Project. Therefore, impacts related to alteration of existing drainage patterns were found to be less than significant.

### **Project Analysis**

The Projects' potential effects relating to alteration of existing drainage patterns were adequately evaluated in Section 3.9.2 of the General Plan EIR and determined by the City to be less than significant. Thus, the Project would not directly result in any significant impacts relating to alteration of existing drainage patterns, and therefore no further environmental review is required. The proposed Project consists of the pre-zoning for approximately 66 acres and the annexation of approximately 51.5 acres into the City of Napa boundaries. No development or construction would occur within the Project Site as part of the Project; therefore, the Project would not impede

or redirect flood flows. Therefore, impacts related to flooding and the existing stormwater drainage system capacity would be less than significant, and the proposed Project would not result in any impacts that are new or more significant than those analyzed in the General Plan Update EIR.

### **d) Release Pollutants Due to Flood or Tsunami**

The General Plan Update EIR (Impact HYD-4) determined that due to proximity to the Napa River, much of the City is within the 100-year floodplain. The City is currently constructing the Napa River-Napa Creek Flood Protection Project (NRNCFPP) to protect the existing and proposed future growth (which is within the current City limits) from flooding from the Napa River. However, the NRNCFPP is not yet fully constructed, and because the future floodplain map is uncertain at this time, there would be a potential impact of new growth being located in a floodplain. This would be a temporary impact, because the NRNCFPP is estimated to be completed in 2027.

Implementation of the General Plan update policies would increase the emphasis on flood control related to new developments. General Plan Policy LUCD-3 would require the City to incorporate open spaces as part of flood-improvement projects. General Plan Policy SN 3-3 would limit development in the 100-year floodplain to development which represents an acceptable use of the land in relation to the hazards involved and the costs of providing flood control facilities. General Plan Policy SN 3-4 would require all projects in floodplains, to the extent feasible, to adhere to strict design guidelines to ensure that any proposed development will withstand a flooding event and will not jeopardize the existing surrounding or downstream structures. Additionally, General Plan Policy SN 3-5 would require the City to maintain a program to review reservoir dam safety and continue to cooperate with other jurisdictions, such as the Division of Safety of Dams, in addressing needed dam maintenance or structural improvements to mitigate risks caused by dam failure and inundation. General Plan Policy SN 3-6 would require the City to work with the State to minimize the risk of damage from inundation due to failure of Rector Reservoir by maintaining the dam in a safe condition. Therefore, the General Plan Update EIR concluded that the potential for loss, injury or death from impeding flood flows would be reduced to a less than significant level. Similarly, the General Plan Update EIR concluded that the risk of release of pollutants due to inundation would also be less than significant.

### **Project Analysis**

The Project Site is not located within a floodway, 100-year floodplain, or 500-year floodplain. The Project is 14 miles from the San Francisco Bay and not located near the ocean nor a body of water subject to seiche. Therefore, consistent with the conclusions of the General Plan Update EIR, the Project's effects related to inundation hazards are considered less than significant.

### **e) Conflict with Water Quality Control Plan or Sustainable Groundwater Management Plan**

The General Plan Update EIR determined that implementation of the General Plan would not obstruct implementation of a water quality control plan or sustainable groundwater management plan due to existing regulatory requirements that would prevent the pollution of water resources and the depletion of groundwater supplies (Construction General Permit, Small MS4 permit, General Dewatering Permit, City standards, local ordinances, and General Plan policies). Furthermore, implementation of the General Plan would not substantially deplete groundwater resources from increased groundwater pumping or result in over-withdrawal as the City relies on surface water for its municipal drinking supply. Therefore, the General Plan Update EIR concluded that impacts would be less than significant, and no mitigation is required.

### **Project Analysis**

The proposed Project consists of the pre-zoning for approximately 66 acres and the annexation of approximately 51.5 acres into the City of Napa boundaries. therefore, the impacts would be less than significant, and the proposed Project would not result in any impacts that are new or more significant than those analyzed in the General Plan Update EIR. The Projects' potential effects relating to conflicts with any water quality control plan or any sustainable

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groundwater management plans were adequately evaluated in Section 3.9.2 of the General Plan EIR and determined by the City to be less than significant. Thus, the Project would not directly result in any significant impacts relating to conflicts with a water quality control plan or any sustainable groundwater management plan and therefore no further environmental review is required.

### CEQA Conclusion

The General Plan Update EIR adequately evaluated the potential hydrology and water quality impacts of the proposed Project. Therefore, potential impacts would be less than significant and additional mitigation is not required.

### Land Use

Would the Project:	Napa 2040 General Plan Update EIR Findings	Relationship to Napa 2040 General Plan Update EIR Findings:			Project Conclusions:
		Equal or Less Severe	Adequately Addressed in General Plan EIR	New or Substantially More Severe	Resulting Level of Significance
a) Physically divide an established community	LTS	■	■	□	No Impact
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect	LTS	■	■	□	LTS

#### a) Divide an Established Community

The General Plan Update EIR found that the General Plan update includes numerous policies intended to avoid dividing established communities and ensuring that new development remains interconnected. The General Plan found that implementation of General Plan policies and actions would support community connectivity rather than support development that could divide an established community. New development is anticipated to be primarily infill development and redevelopment of existing developed properties, which would not divide an established community. The General Plan Update EIR determined that the General Plan would not physically divide an established community. Impacts would be less than significant.

### Project Analysis

The proposed Project would not result in a physical division of an established community or adversely affect the continuity of land uses in the vicinity. Therefore, this impact would be less than significant. Implementation of proposed Project would not result in any new or more significant impacts related to the division of an established community than those analyzed in the General Plan Update EIR.

#### b) Conflict with Land Use Plan, Policy, or Regulation

The General Plan Update EIR determined that implementation of the General Plan would require preparing zoning and subdivision ordinance amendments, reviewing development applications, conducting investigations, and making reports and recommendations on planning and land use, zoning, subdivisions, development plans, and environmental regulations. Additionally, the City's Zoning Ordinance would be revised to implement the General Plan, as required by State Law. The General Plan Update EIR determined that the General Plan is consistent with regional and local plans including the Napa County General Plan, Napa County Code of Ordinances, the City of Napa Hillside

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Overlay District requirements, the Napa County Airport Land Use Compatibility Plan, and the RTP/SCS and that it would not conflict with any existing specific plans in Napa or regulations that protect the environment. Additionally, the General Plan includes various policies that protect the environment (Policies CSS 1-1, CSS 1-2, CSS 1-3, CSS 1-4, NRC 1-1, NRC 1-2, NRC 1-3, NRC 1-4, NRC 1-5, NRC 1-6, NRC 1-7, NRC 1-8, NRC 2-1, NRC 2-2, NRC 3-1, NRC 3-2, NRC 4-1, NRC 4-2, NRC 4-3, NRC 10-3, NRC 10-4, NRC 10-6, SN 3-1, and SN 5-1). The General Plan Update EIR concluded that with implementation of these policies in future development projects, implementation of the General Plan would not conflict with any applicable land use plans, policies, or regulations intended to protect the environment and impacts would be less than significant.

### Project Analysis

The Project Site is designated Medium Density Residential in the General Plan. This designation consists of residential development with densities ranging from 8.0 to 18.0 units per gross acre. Following the pre-zoning for approximately 66 acres and the annexation of approximately 51.5 acres of the Project Site, the City of Napa General Plan will require a master plan designation for future development of the Project Site. Per City Municipal Code, master plans may be utilized in any General Plan land use category to implement the goals and policies of the General Plan. The specific purposes of the Master Plan (MP) district are to:

- A. Promote and encourage cluster development on large sites (typically larger than 10 acres in size) to avoid sensitive areas of property and provide a mechanism for establishment of open areas in land development.
- B. Design the site as a whole, rather than incrementally.
- C. Encourage innovative design on large sites by allowing flexibility in property development standards.
- D. Accommodate various types of complex, mixed use, phased developments.
- E. In mixed use land use categories, to apply policies and general zoning standards associated with mixed use.
- F. Enable governmental bodies to receive information and provide an integrated response to immediate and long-range impacts of such developments.
- G. When applied to properties in advance of adoption of a property-specific master plan, to alert individuals to the requirement for preparation of a master plan.

Any future development associated with the proposed project is within the amount of growth evaluated and cleared within the General Plan Update EIR and is compatible with existing and future uses in the vicinity of the project site. All future development within the Project Site would be subject to compliance with applicable goals, objectives, and policies of the City of Napa General Plan, the City's zoning requirements, the City's Municipal Code requirements, and other applicable regulations adopted for the purpose of avoiding or mitigating an environmental effect. There are no components of the proposed Project that would result in a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. No impact would occur. Therefore, the Project would not result in any new significant impacts not already analyzed in the General Plan Update EIR or increase the severity of a significant impact as previously identified and analyzed in that EIR

### CEQA Conclusions

The General Plan Update EIR adequately evaluated the potential land use impacts of the proposed Project. Therefore, potential impacts would be less-than-significant and additional mitigation is not required.

### Minerals

Would the Project:	Napa General Plan Update	Relationship to Napa General Plan Update EIR Findings:	Project Conclusions:
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	EIR Findings	Equal or Less Severe	Adequately Addressed in General Plan EIR	New or Substantially More Severe	Resulting Level of Significance
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state	No Impact	■	■	□	No Impact
b) Result in the loss of availability of a locally important mineral resource recovery Site delineated on a local general plan, specific plan, or other land use plan	No Impact	■	■	□	No Impact

### Loss of Important Mineral Resources

The General Plan Update EIR concluded that there are no mineral resource recovery sites within the General Plan’s Planning Area.

### Project Analysis

There are no known important mineral deposits or active mineral extraction operations identified by the California Department of Conservation at the Project Site. Consistent with the findings of the General Plan Update EIR, the Project would not have an adverse effect on important mineral resources. Based on the analysis, findings, and conclusions of the prior General Plan Update EIR, implementation of the Project would not substantially increase the severity of any significant impacts on mineral resources as identified in that Program EIR, nor would it result in new significant impacts related to mineral resources that were not previously identified. The General Plan Update EIR did not identify any mitigation measures related to mineral resources that would apply to the Project and none would be needed.

### CEQA Conclusion

The General Plan Update EIR adequately evaluated the mineral resource impacts of the proposed Project. Therefore, potential impacts would be less than significant and additional mitigation is not required.

### Noise and Vibration

Would the Project:	Napa General Plan Update EIR Findings	Relationship to Napa General Plan Update EIR Findings:			Project Conclusions:
		Equal or Less Severe	Adequately Addressed in General Plan EIR	New or Substantially More Severe	Resulting Level of Significance
a) Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies				□	

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<ul style="list-style-type: none"> <li>• Construction</li> </ul>	LTS	■	■	□	LTS with PR
<ul style="list-style-type: none"> <li>• Traffic Noise</li> </ul>	LTS	■	■		LTS
<ul style="list-style-type: none"> <li>• Train Noise</li> </ul>	LTS	■	■		LTS
<ul style="list-style-type: none"> <li>• Stationary Source Noise</li> </ul>	LTS	■	■		LTS
b) Generate excessive ground borne vibration or ground borne noise levels	LTS	■	■	□	LTS
c) For a Project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the Project area to excessive noise levels	LTS	■	■	□	No Impact

**a) Generation of a Substantial Increase in Ambient Noise Levels in Excess of Standards**

*Construction*

The General Plan Update EIR (Impact NOI-1) concluded that development and land use activities contemplated by the General Plan Update could generate a substantial temporary increase in ambient noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. However, to protect future and existing sensitive land uses from substantial temporary noise increases during construction activities, policies in the General Plan update would serve to minimize impacts. General Plan Policy SN 4-7 includes a requirement for future development to implement noise control measures, standards, and monitoring procedures to reduce impacts on nearby uses. General Plan Policy SN 4-8 requires measures to reduce noise impacts for construction activity that is within 1,000 feet of noise-sensitive uses.

Compliance with the time-of-day restrictions and noise muffling requirements for construction activity in the City’s noise ordinance, as well as the noise-reducing policies included in the General Plan update, would reduce impacts on sensitive receptors. Measures to reduce noise may include using enclosures around noise-generating equipment, locating equipment as far away from adjacent land uses as possible, and requiring a procedure for tracking and responding to noise complaints received from affected sensitive receptors. Because measures to reduce noise would be implemented, the increases in noise from construction activities would not be considered substantial. Therefore, this impact would be less than significant.

*Traffic Noise*

The General Plan Update EIR (Impact NOI-1) found that the contribution of future traffic to the noise environment in the City would generally be below the increase in noise considered to be noticeable to the human ear (i.e., 3 dB). Consequently, with the exception of one roadway segment (Solano Avenue north of Trower Avenue), the Project would not result in noticeable changes in traffic noise levels relative to 2040 conditions without the Project at any roadway segment. The segment where the 5 dB increase would occur (Solano Avenue north of Trower Avenue) would experience an increase in noise even in the absence of the Project, because growth in the city and thus traffic would increase regardless of whether the Project is implemented. The increase in noise in 2040 at this segment without the Project would be approximately 6 dB, while the increase in 2040 with the Project would be 5 dB. Although the increase in traffic noise at Solano Avenue north of Trower Avenue may be noticeable relative to existing conditions, there would be no increase in noise relative to 2040 conditions without the Project. Because

background growth and corresponding traffic noise would occur in the absence of the Project, the increase in noise of 5 dB relative to existing conditions would be a lower increase than if the Project were not implemented.

As stated in Impact NOI-1, the General Plan update would not cause noticeable increases in traffic noise at any roadway segment relative to 2040 No Project conditions. Although four segments would experience noticeable noise increases relative to existing conditions, these increases would occur in 2040 with or without the Project. For these reasons, there would be no substantial permanent increase in traffic noise, and the impact would be less than significant.

### *Train Noise*

The General Plan Update EIR (Impact NOI-1) identified that new developments that could occur with the General Plan Update could result in land uses being exposed to train noise that exceeds applicable land use compatibility standards. However, for land uses in the Planning Area near the railroad tracks, noise from the train horn and bell, and crossing gates are part of the ambient noise environment. Pursuant to the California Supreme Court decision in *California Building Industry Association vs. Bay Area Air Quality Management District* that “CEQA generally does not require an analysis of how existing environmental conditions will impact a project’s future users or residents,” the General Plan Update EIR concluded that because noise from trains is an existing condition in the Planning Area, and the General Plan Update would not increase train operations, the impact is not significant under CEQA.

### *Stationary Source Noise*

The General Plan Update EIR (Impact NOI-1) determined that development under the General Plan update would have the potential to result in increased noise levels from the development of new stationary noise sources, which could occur near sensitive land uses. However, General Plan Policy SN 4-3 includes the goal for new development not to generate noise in excess of the performance standards in the General Plan update. This guiding principle for new development would reduce operational sources of noise that may affect existing noise-sensitive land uses, because new development would be designed with the performance standards in mind. Because the goal of Policy SN 4-3 is for new development not to cause existing development to exceed the performance standards from the General Plan update, development that meets this goal would not cause a permanent increase in ambient noise levels in excess of standards in the existing General Plan.

### **Project Analysis**

The Projects’ potential effects relating to the generation of a substantial increase in ambient noise levels in excess of standards were adequately evaluated in Section 3.11.2 of the General Plan EIR and determined by the City to be less than significant. Thus, the Project would not result in any significant impacts relating to the generation of a substantial increase in ambient noise levels in excess of standards, and therefore no further environmental review is required. The proposed Project consists of the pre-zoning for approximately 66 acres and the annexation of approximately 51.5 acres into the City of Napa boundaries. Therefore, the implementation of the proposed Project would not result in any new or more significant impacts related to construction-period noise than those analyzed in the General Plan Update EIR.

#### **b) Generation of Excessive Ground borne Vibration**

The General Plan Update EIR (Impact NOI-2) determined that construction resulting from the General Plan could result in generation of excessive ground borne vibration or ground borne noise levels. Construction activities and the operation of heavy trucks, buses and trains can produce vibration that may be felt by adjacent uses. However, policies in the General Plan update would serve to minimize impacts. General Plan Policy SN 4-7 includes a requirement for future development to implement vibration control measures, standards, and monitoring procedures to reduce impacts on nearby uses. General Plan Policy SN 4-8 requires measures to prevent exposure of vibration-sensitive receptors to substantial ground borne vibration levels, for receptors within 100 feet of pile-driving locations and 25 feet of non-impact equipment. As such, future developments would be required to sufficiently reduce

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vibration through a combination of measures to prevent adversely affecting nearby vibration-sensitive land uses. For these reasons, the increases in vibration from construction activities would not be considered substantial. Therefore, this impact would be less than significant.

Given the specific set of circumstances required for traffic vibration to be noticeable (i.e., severe roadway discontinuities and high truck volumes) and the duration of the impact that would result under these circumstances (i.e., a fraction of a second), it is unlikely that traffic vibration would be perceived by any land uses. Perceptible ground borne vibration from vehicle traffic is not likely to be a common occurrence; therefore, the impact is less than significant.

### Project Analysis

The Projects’ potential effects relating to the effects of ground born vibration were adequately evaluated in Section 3.11.2 of the General Plan EIR and determined by the City to be less than significant. Thus, the Project would not result in any significant impacts relating to the effects of ground born vibration and therefore no further environmental review is required. The proposed Project consists of the pre-zoning for approximately 66 acres and the annexation of approximately 51.5 acres into the City of Napa boundaries. Therefore, the implementation of the proposed Project would not result in any new or more significant impacts related to construction vibration than those analyzed in the General Plan Update EIR.

#### c) Aircraft Noise Source Impacts

The General Plan Update EIR determined that occasional aircraft overflight noise may be audible to people in the Planning Area; however, 24-hour average noise levels from airport operations in the Planning Area are compatible with the ALUCP. Additionally, no other public or private airfields are within 2 miles of the Planning Area. Implementation of the General Plan update would not worsen the levels of noise to which residents and employees within the Planning Area would be exposed. The impact would be less than significant.

### Project Analysis

The Napa County Airport is located approximately 7.8 miles south of the project site. Based on General Plan FEIR, 24-hour average noise levels from airport operations in the General Plan Planning Area are compatible with the ALUCP. Additionally, no other public or private airfields are within two miles of the project site. Therefore, implementation of the proposed Project would not result in any new or more significant impacts related to aircraft noise than those analyzed in the General Plan Update EIR.

### Conclusion

The General Plan Update EIR adequately evaluated the potential impacts associated with noise resulting from the proposed Project. Therefore, potential impacts would be less than significant, and no additional mitigation is required.

### Population and Housing

Would the Project:	Napa General Plan Update EIR Findings	Relationship to Napa General Plan Update EIR Findings:			Project Conclusions:
		Equal or Less Severe	Adequately Addressed in General Plan EIR	New or Substantially More Severe	Resulting Level of Significance

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a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)	LTS	■	■	□	LTS
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere	LTS	■	■	□	No impact

### a) Induce Population Growth

The General Plan Update EIR determined that implementation of the General Plan would result in approximately 7,800 new housing units, which would increase the city’s population by approximately 17,900 to 97,200 by 2040. This increase in population would be accompanied by an increase in employment opportunities to expand the city’s employment base, providing an additional 10,800 jobs by 2040. New homes and businesses developed in the Planning Area as a result of the General Plan would accommodate growth in Napa that is commensurate with the city’s size, growth rate, and place in the region. The General Plan anticipates all growth to occur within Napa’s existing Rural Urban Limit and encourages infill development that is designed to focus on redevelopment and revitalization of areas already served by infrastructure that would not require extensions of roads or other infrastructure. Although some road extensions and improvements are anticipated, this work is largely to improve connectivity within the existing city structure and would not result in unplanned growth. Areas outside the Focus Areas that are planned for growth would include the necessary street and infrastructure improvements to accommodate planned growth. Thus, no new road extensions, improvements, or infrastructure would indirectly result in substantial unplanned population growth. Therefore, the General Plan Update EIR concluded that implementation of the General Plan would not induce substantial unplanned population growth, either directly or indirectly, and impacts would be less than significant.

### Project Analysis

CEQA Guidelines Section 15126.2[d] identifies a project as growth inducing if it fosters economic or population growth, or the construction of additional housing either directly or indirectly in the surrounding environment. Under CEQA, growth inducement is not considered necessarily detrimental, beneficial, or of little significance to the environment. Typically, the growth-inducing potential of a project would be considered substantial if it fosters growth or a concentration of population in excess of what is assumed in pertinent master plans, land use plans, or in projections made by regional planning agencies. The anticipated population growth associated with the proposed project represents less than a one percent increase to the City’s current population. The City’s population is projected to grow by 17,954 to a total population of 97,200 by 2040 according to projections in the General Plan. Therefore, the proposed Project would not result in any new or more significant population growth than was previously analyzed and described in the General Plan Update EIR.

### b) Housing Displacement

The General Plan Update EIR determined that a substantial portion (about 50 percent) of developed land in the Planning Area consists of residential uses, which are not anticipated to undergo significant land use changes under the General Plan. Additionally, the General Plan concentrates new high-density and mixed-use development in downtown, in Focus Areas located along major corridors, and in opportunity sites in different parts of the city. Overall, the General Plan focuses on providing infill development housing opportunities while seeking to preserve existing housing and neighborhoods. Additionally, new land use classifications included in the General Plan introduce greater flexibility of uses and allow a higher intensity of residential uses in more areas of the city. Therefore, implementation of the General Plan is projected to increase the overall number of housing units and provide additional housing opportunities to serve the diverse needs of the community at various socioeconomic levels. Furthermore, the Public

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Health and Equity Element of the General Plan includes policies to prevent displacement (Policies PHE 4-4 and PHE 6-7). Therefore, the General Plan Update EIR concluded that any displacement impact on existing housing units or people would be less than significant with no mitigation required.

### Project Analysis

The Population and Housing section on page 3.12-3 of General Plan 2040 projects a population growth of 17,900 within the planning period based on household size of 2.66. The potential number of new households in future development of the Project site is approximately 1,188 units based on General Plan densities with an approximate estimate of 3,160 persons. This estimate is well within the General Plan’s projected population growth. The Projects’ potential effects relating to the displacement of housing were adequately evaluated in Section 3.12.2 of the General Plan EIR and determined by the City to be less than significant. Thus, the Project would not result in any significant impacts relating to the displacement of housing and therefore no further environmental review is required. The proposed Project consists of the pre-zoning for approximately 66 acres and the annexation of approximately 51.5 acres into the City of Napa boundaries. No development or construction would occur within the Project Site as part of the Project. Therefore, the proposed Project would not require the displacement of existing housing or people or the construction of replacement housing elsewhere. Therefore, implementation of the proposed Project would not result in any impacts related to the displacement of housing or people that are new or more significant than those analyzed in the General Plan Update EIR.

### CEQA Conclusions

The General Plan Update EIR adequately evaluated the potential population and housing impacts of the proposed Project. Therefore, potential impacts would be less-than-significant, and additional mitigation is not required.

### Public Services

Would the Project: Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	Napa 2040 General Plan Update EIR Findings	Relationship to Napa 2040 General Plan Update EIR Findings:			Project Conclusions:
		Equal or Less Severe	Adequately Addressed in General Plan EIR	New or Substantially More Severe	Resulting Level of Sig- nificance
a) Fire Protection	LTS	■	■	□	LTS with PR
b) Police Protection	LTS	■	■	□	LTS
c) Schools	LTS	■	■	□	LTS

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<p>d) Parks</p> <p>Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated</p> <p>Does the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment</p>	LTS	■	■	□	LTS
<p>e) Other Public Facilities</p>	LTS	■	■	□	LTS

**a) Fire Protection Impacts**

The General Plan Update EIR determined that buildout under the General Plan would increase the population of the City by approximately 17,900 residents by 2040, which would likely increase the demand on fire protection and emergency services and may require new or expanded fire stations that would have the potential to result in adverse environmental impacts. Future new or expanded fire protection facilities would be subject to CEQA analysis and the potential environmental impacts associated with the construction of new fire stations or operation of fire stations can usually be mitigated to a less-than-significant level. The mitigation measures for impacts of the General Plan would further ensure that impacts of construction and operation of new fire stations would be less than significant.

Furthermore, the General Plan includes goals and policies to ensure adequate levels of service and funding are available for fire protection services as development occurs (CS-1, CS-1.1, CS-1.2, CS-1.4, CS-1.7, CS-2, SC-2.1, CS-2.2, CS-5, CS-5.1, CS-5.3, CS-6, CS-6.1 through CS-6.10, CS-7, CS-7.1, CS-7.2, and CS-7.3). The General Plan also includes various goals and policies that would support adequate infrastructure, services, and facilities relevant to fire protection services (CSPR-1, CSPR 1-1, CSPR 1-3, CSPR 1-4, CSPR 1-5, CSPR 1-7, CSPR 1-11, CSPR-3, and CSPR 3-1). Additionally, Chapter 15.78 of the City’s Municipal Code requires that the developer of each new dwelling unit would pay a fire and paramedic development impact fee that would finance new facilities and/or enhanced staffing and equipment associated with the increased service demands from the new development. Therefore, the General Plan Update EIR concluded that impacts related to fire protection services would be less than significant, and no mitigation measures would be required.

**Project Analysis**

The proposed Project does not involve construction or development. As explained in the General Plan EIR, if future development of the Project area is approved consistent with the Medium Density Residential General Plan Designation, that development would result in an insignificant increase in the overall population of the City (existing residences) and therefore only incrementally increase the demand for emergency fire services and emergency medical services. The Fire Department would continue providing services to the Project Site and would not likely require additional firefighters to serve the future development at the Project Site. The construction of a new or expanded fire station would not be required. The potential increase in demand for services is not expected to adversely affect existing response times to the Project Site or within the City. Additionally, as required by Chapter 15.78 of the City’s Municipal Code, a future applicant to develop the Project Site with residential uses would be required to pay a fire development impact fee which would be directed towards maintaining adequate service levels, ensuring that any impact to fire protection that could result from the proposed Project would be offset by development fees, and in effect, reduce potential impacts to a less-than-significant level. Therefore, implementation of the proposed Project would not result in any impacts related to fire protection services that are new or more significant than those analyzed in the General Plan Update EIR. In sum, the proposed Project’s potential fire protection impacts were adequately evaluated in Section 3.13.2 of the General Plan EIR and determined to be less than significant, therefore no

further environmental review is required.

### **b) Adverse Police Service Impacts**

The General Plan Update EIR determined that buildout under the General Plan would increase the population of the City by approximately 17,900 residents by 2040, which would likely increase the demand on police protection services and decrease current service level ratios. At the time of the General Plan FEIR, Napa Police Department (NPD) was staffed with 9.5 sworn personnel per 10,000, below the 16.6 sworn personnel per 10,000 national average. The 2040 population of 97,200 projected by the General Plan would further reduce this ratio to 7.8 sworn personnel per 10,000, likely resulting in reduction to response times, necessitating an increase in staffing and the expansion of future police facilities or the construction of new facilities. Future new or expanded police facilities would be subject to CEQA analysis and the potential environmental impacts associated with the construction of new police facilities or operation of police facilities can usually be mitigated to a less-than-significant level. The mitigation measures for impacts of the General Plan would further ensure that impacts of construction and operation of new police facilities would be less than significant. Furthermore, the General Plan includes goals and policies to ensure adequate levels of service and funding are available for police protection services as development occurs (CS-1, CS-1.1, CS-1.2, CS-1.4, CS-1.7, CS-2, SC-2.1, CS-2.2, CS-5, CS-5.1, CS-5.3, CS-6, CS-6.1 through CS-6.10, CS-7, CS-7.1, CS-7.2, CS-7.3, CS-3, CS-3.1, CS-3.2, CS-3.3, CS-4, CS-4.1, CS-4.2, and CS-4.3). The General Plan also includes various goals and policies that would support adequate infrastructure, services, and facilities relevant to police protection services (CSPR-1, CSPR 1-1, CSPR 1-3, CSPR 1-4, CSPR 1-5, CSPR 1-6, CSPR 1-7, CSPR 1-9, and CSPR 1-11). Therefore, the General Plan Update EIR concluded that impacts related to police protection services would be less than significant and no mitigation measures would be required.

### **Project Analysis**

As explained in the General Plan EIR, the proposed Project would insignificantly increase the overall population of the City and incrementally increase demand for emergency police services. The Police Department would continue to provide service to the Project Site and would not require additional officers to serve the project. The construction of new or expanded police facilities would not be required, therefore there would be no new or more significant CEQA impacts relating to the provision of police services. In sum, the proposed Project's potential adverse police impacts were adequately evaluated in Section 3.13.2 of the General Plan EIR and determined to be less than significant, therefore no further environmental review is required.

### **c) Adverse School Impacts**

The General Plan Update EIR (Impact PS-1) found that while Napa Valley Unified School District (NVUSD) capacity currently exceeds enrollment, the projected 2040 student population would significantly exceed this current capacity, putting pressure on NVUSD to create new or expanded facilities. In addition, many existing NVUSD facilities are over 20 years old and in need of modernization. General Plan update policies would continue to support schools and education within the City of Napa. Goals and policies support working with NVUSD to plan for future school facility needs, the co-location of City and other public facilities (i.e., schools and libraries), and supporting efforts for high-quality and affordable preschool. Furthermore, future development under the General Plan Update would be subject to developer fees, which are deemed by law to fully mitigate impacts of new development on school districts. The types, number, locations, physical sizes, and designs of future public schools, as well as the expansion of existing schools to accommodate future growth are unknown. However, because public school approval is outside the authority of the City, construction of public schools is not a component of the General Plan Update. Accordingly, for this General Plan Update, this impact is expected to be less than significant, and no mitigation is proposed.

### **Project Analysis**

The Projects' potential adverse school impacts were adequately evaluated in Section 3.13.2 of the General Plan EIR and determined by the City to be less than significant. Thus, the Project would not result in any significant impacts relating to schools and therefore no further environmental review is required. The proposed Project consists of the

pre-zoning for approximately 66 acres and the annexation of approximately 51.5 acres into the City of Napa boundaries. No development or construction would occur within the Project Site as part of the Project; therefore, implementation of the proposed Project would not result in any impacts related to schools that are new or more significant than those analyzed in the General Plan Update EIR.

### **d) Adverse Park Impacts**

The General Plan Update EIR (Impact PS-1) found that the City of Napa currently exceeds the existing General Plan service standard of 12 acres of active and passive parkland per 1,000 residents. The construction of housing (i.e., single- and multi-family residences) would increase the demand for parks in the City. The General Plan Update includes policy CSPR 9-1, which would set the General Plan park standard at a lower 10.0 acres of parkland per 1,000 residents. The Project would not exceed the applicable thresholds. Accordingly, the General Plan Update EIR additionally stated that this impact is expected to be less than significant, and no mitigation is proposed.

### **Project Analysis**

The proposed Project would not require the construction of any new parks, or additional modifications of any existing parks beyond those previously described. Therefore, the proposed Project would not result in any new or more significant impacts related to parks than was previously analyzed and described in the General Plan Update EIR, in Section 3.13.2, where the City determined that any such impacts would be less than significant.

### **e) Adverse Impacts on Other Public Facilities**

The General Plan Update EIR (Impact PS-1) expected that the increase to population of the City of Napa would put further strain on library services and further diminish the ratio pertaining to square footage per service population. To achieve acceptable ratios pertaining to square footage per capita, it is reasonably foreseeable that the provision of new or physically altered library facilities could be required, with the potential to result in adverse environmental impacts. The number, locations, and designs of future libraries and library expansions are unknown. Consequently, because future new or expanded public libraries would be subject to CEQA analysis by the County, construction of libraries is not a component of the General Plan Update. Accordingly, for this General Plan Update, this impact is expected to be less than significant, and no mitigation is proposed.

### **Project Analysis**

The proposed Project consists of the pre-zoning for approximately 66 acres and the annexation of approximately 51.5 acres into the City of Napa boundaries. No development or construction would occur within the Project Site as part of the Project, and the proposed Project simply conforms the City's zoning to the General Plan land use designation. The potential impacts of new development under the City's General Plan land use designation were adequately evaluated by the General Plan EIR. Therefore, the proposed Project would not result in any new or more significant impacts related to parks than was previously analyzed and described in the General Plan Update EIR.

### **CEQA Conclusions**

Based on the analysis, findings, and conclusions of the prior General Plan Update EIR, implementation of the Project would not substantially increase the severity of any significant impacts related to public services as identified in that General Plan Update EIR, nor would it result in new significant impacts related to public services that were not previously identified. The General Plan Update EIR did not identify any mitigation measures related to public services that would apply to the Project and none would be needed.

### **Recreation**

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Would the Project:	Napa General Plan Update EIR Findings	Relationship to Napa General Plan Update EIR Findings:			Project Conclusions:
		Equal or Less Severe	Adequately Addressed in General Plan EIR	New or Substantially More Severe	Resulting Level of Significance
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	LTS	■	■	□	LTS
b) Require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	LTS	■	■	□	LTS

**a) Increase the use of existing neighborhood and regional parks or other recreational facilities**

As discussed under Impact REC-1, the General Plan Update EIR found that park acreage is sufficient to meet future demand, and that the General Plan update directs the City to focus capital projects on sustaining and improving existing parks and includes policies and standards that ensure residents are within close access to parks. Therefore, the General Plan update would not increase the use of existing recreational facilities such that it would result in the substantial deterioration or the acceleration of the deterioration of existing parks and recreational facilities. The General Plan Update EIR additionally stated that this impact would be less than significant, and no mitigation would be necessary.

**Project Analysis**

The proposed Project consists of the pre-zoning for approximately 66 acres and the annexation of approximately 51.5 acres into the City of Napa boundaries. No new development or construction would be authorized with approval of the Project and the proposed Project simply conforms the City’s zoning to the General Plan land use designation. Nonetheless, the potential impacts of new development under the City’s General Plan land use designation were adequately evaluated by the General Plan EIR, in Section 3.14.2 and determined to be less than significant, and therefore no further environmental review is required.

**b) Construct or Expand Recreational Facilities**

As discussed under Impact REC-2, given that population growth under the General Plan update would result in a service ratio that meets the City’s park service standards (thereby limiting the extent to which new recreational facilities would be constructed or existing facilities expanded). Additionally, proposed General Plan policies NRC 3-1 and 4-2 call for the maintenance of existing parks and open space designated land. Proposed policies NRC 10-2 through 10-6, and CCS 3-1 and 3-2, and NRC 2-1 through 2-4 would protect sensitive resources and habitats. Therefore, the General Plan update would not result in a significant impact from construction or expansion of recreational facilities, and no mitigation would be necessary.

**Project Analysis**

The proposed Project would not result in any new or more severe environmental impacts beyond those described in the General Plan Update EIR, because the proposed Project simply conforms the City’s zoning to the General Plan land use designation. Nonetheless, the potential impacts of new development under the City’s General Plan land use designation were adequately evaluated by the General Plan EIR, in Section 3.14.2 and determined to be less than significant, and therefore no further environmental review is required. Therefore, the proposed Project would

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not result in additional environmental effects beyond those described in that document, and this impact would be less than significant.

## CEQA Conclusions

The General Plan Update EIR adequately evaluated the potential recreation impacts of the proposed Project. Therefore, potential impacts would be less-than-significant and additional mitigation is not required.

## Transportation

Would the Project:	Napa General Plan Update EIR Findings	Relationship to Napa 2040 General Plan Update EIR Findings:			Project Conclusions:
		Equal or Less Severe	Adequately Addressed in General Plan EIR	New or Substantially More Severe	Resulting Level of Significance
a) Conflict with a program, plan, ordinance, or policy assessing the circulation system, including transit, roadways, bicycle, and pedestrian facilities	LTS	■	■	□	LTS
b) Conflict with or be inconsistent with CEQA Guidelines Section 15064.3, subsection (b) re: VMT	SU	■	■	□	LTS
c) Substantially increase hazards due to a geometric design feature	LTS	■	■	□	LTS
d) Result in inadequate emergency access	LTS	■	■	□	LTS

### a) Conformance with Transportation Policies.

The General Plan Update EIR determined that the General Plan is consistent with the Plan Bay Area 2020 Final Plan and supports and expands upon the improvements identified in the City of Napa Bicycle Plan as well as the Napa Countywide Bicycle Plan. The Transportation Element of the General Plan focuses on enhancing transportation options for Napa residents, workers, and visitors and improving mobility through increased connectivity and efficient management of existing infrastructure. The Transportation Element looks at improving transportation options and connectivity within the City, as well as furthering the goals of the Napa Vision and Guiding Principles, including environmental sustainability, connected neighborhoods, increased travel options, balancing tourism, and local needs, and achieving a healthy and safe community for all. The General Plan Update EIR concluded that implementation of the General Plan would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities, and impacts would be less than significant.

## Project Analysis

The proposed Project consists of the pre-zoning for approximately 66 acres and the annexation of approximately 51.5 acres into the City of Napa boundaries. No new development or construction would be authorized with approval of the Project. As such, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities, and impacts would be less than significant. Because the proposed Project simply conforms the City’s zoning for the Project area to the existing General Plan land use designation, the proposed Project would not result in any new or more significant impacts related to transportation plans and policies than was previously analyzed and described in the General Plan Update EIR, in

Section 3.15.2. There, the City determined that the potential impacts from the Project relating to conformance with transportation policies would be less than significant.

### **b) Vehicle Miles Traveled.**

The General Plan Update EIR determined that VMT per capita for the City under the No Project conditions is 11.3 and under the With Project conditions VMT per capita would decrease to 9.03 in the City. As such, implementation of the General Plan would decrease VMT per capita from No Project conditions to With Project conditions. In addition, VMT per capita under the With Project conditions would be 15 percent below the baseline. Therefore, the General Plan Update EIR concluded that impacts would be less than significant.

### **Project Analysis**

The proposed Project consists of the pre-zoning for approximately 66 acres and the annexation of approximately 51.5 acres into the City of Napa boundaries. No new development or construction would be authorized with approval of the Project. The Projects' potential adverse impacts relating to vehicle miles traveled were adequately evaluated in Section 3.15.2 of the General Plan EIR and determined by the City to be less than significant. Thus, the Project would not result in any significant impacts relating to vehicle miles traveled and therefore no further environmental review is required.

### **c) Site Access and Circulation.**

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

### **Project Analysis**

The proposed Project consists of the pre-zoning for approximately 66 acres and the annexation of approximately 51.5 acres into the City of Napa boundaries. . As such, the Project would not result in any new or more significant impacts related to site access and circulation than were previously analyzed and described in the General Plan Update EIR. The Projects' potential adverse impacts relating to site access and circulation were adequately evaluated in Section 3.15.2 of the General Plan EIR and determined by the City to be less than significant. Thus, the Project would not result in any significant impacts relating to site access and circulation and therefore no further environmental review is required.

### **d) Emergency Access.**

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

### **Project Analysis**

The proposed Project consists of the pre-zoning for approximately 66 acres and the annexation of approximately 51.5 acres into the City of Napa boundaries. . As such, the Project would not result in any new or more significant

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impacts related to emergency access than were previously analyzed and described in the General Plan Update EIR. The Projects’ potential adverse impacts relating to emergency access were adequately evaluated in Section 3.15.2 of the General Plan EIR and determined by the City to be less than significant. Thus, the Project would not result in any significant impacts relating to emergency access and therefore no further environmental review is required.

### CEQA Conclusion

The General Plan Update EIR adequately evaluated the potential transportation impacts for the proposed Project. Therefore, potential impacts would be less than significant and additional mitigation is not required.

### Tribal Cultural Resources

<b>Would the Project:</b> Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a Site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	<b>Napa General Plan Update EIR Findings</b>	<b>Relationship to Napa General Plan Update EIR Findings:</b>			<b>Project Conclusions:</b>
		<b>Equal or Less Severe</b>	<b>Adequately Addressed in General Plan EIR</b>	<b>New or Substantially More Severe</b>	<b>Resulting Level of Significance</b>
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	LTS w/MM	■	■	□	LTS
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1  In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	LTS w/MM	■	■	□	LTS

### Napa General Plan Update EIR Conclusions

The City consulted with the Yocha Dehe Wintun Nation during the General Plan Update EIR process. During that meeting, the tribe requested that the City include additional goals and policies in the General Plan to recognize, work with, and promote educational opportunities with Tribal Nations. These goals and policies have been included in the Historic & Cultural Resources Element of the Draft General Plan as Goal HR-14, HR-15, and Goal TE-25. In addition to these goals, Mitigation Measure TCR-1 is required. The General Plan Update EIR (Impact TCR-1 and Impact TCR-2) concluded that consultation on future individual projects will provide further protections for any tribal cultural resources identified through the CEQA AB 52 process. Accordingly, the impact of the General Plan update on tribal cultural resources would be less than significant with mitigation incorporated.

### Project Analysis

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As the Project is eligible for a CEQA statutory exemption under Section 15183, no tribal noticing under AB 52b is required. Nonetheless, the City adequately evaluated all of the potential impacts from the Project relating to tribal cultural resources in Section 3.16 of the General Plan EIR. As a result, the Project would comply with Mitigation Measure TCR-1. Additionally, as described in Cultural Resources and below, the Project would comply with and includes measures that would prevent impacts to tribal cultural resources. Therefore, no further environmental review is required.

### CEQA Conclusions

The General Plan Update EIR adequately evaluated the potential tribal cultural resources impacts for the proposed Project. Therefore, potential impacts would be less than significant and additional mitigation is not required.

### Utilities and Service Systems

Would the Project:	Napa 2040 General Plan Update EIR Findings	Relationship to Napa 2040 General Plan Update EIR Findings:			Project Conclusions:
		Equal or Less Severe	Adequately Addressed in General Plan EIR	New or Substantially More Severe	Resulting Level of Significance
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects or expansion of existing facilities, the construction of which could cause significant environmental effects?	LTS	■	■	□	LTS
b) Require or result in the relocation or construction of new or expanded storm-water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	LTS	■	■	□	LTS
c) Potential to result in insufficient available water supplies to serve the Planning Area and reasonably foreseeable future development during normal, dry, and multiple dry years?	LTS	■	■	□	LTS
d) Result in a determination by the wastewater treatment provider that serves or may serve the Project that it has inadequate capacity to serve the Planning Area's projected demand in addition to the provider's existing commitments?	LTS	■	■	□	LTS

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e) Solid waste generation in excess of state or local standards, in excess of the capacity of local infrastructure, or that otherwise impairs the attainment of solid waste reduction goals?	LTS	■	■	□	LTS
f) Failure to comply with federal, state, and local statutes and regulations related to solid waste?	LTS	■	■	□	LTS

**a) Effects on Water Facilities.**

The General Plan Update EIR (Impact UT-1) states that water in the Planning Area is treated among three Water Treatment Plants (WTP): Milliken WTP, Hennessy WTP, and Jamieson Canyon WTP, depending on the water’s original source location. Milliken WTP has a treatment capacity of approximately 4 million gallons per day (MGD); Hennessy WTP has a treatment capacity of approximately 20 MGD; and Jamieson Canyon WTP has a treatment capacity of approximately 20 MGD. As discussed in the General Plan Update, the population of Napa underwent a low (under 1 percent) increase in average annual growth during the last 20 years, and that growth rate is expected to continue. However, the specific distribution and timing of projected development that could be permitted under the General Plan Update is not known; therefore, if the water system infrastructure is not updated or expanded, a deficit in potable and fire service water supplies could occur, potentially violating Safe Drinking Water Act and Health and Safety Code requirements, thereby creating significant impacts. However, the City’s 2020 UWMP establishes the infrastructure necessary to provide the storage, treatment, and transmission facilities to serve future development, maintain overall service reliability, and honor existing export agreements through 2045. Furthermore, by updating the 2020 UWMP based on the General Plan Update projections and constructing facilities recommended in the plan, the City ensures that the potable water distribution system can support all future development.

The General Plan Update EIR explains that any future proposed projects in the City would be required to undergo the City’s project approval process (including CEQA), would be required to comply with existing regulations (including policies and zoning regulations to promote water conservation and green building best practices), and would have to comply with SB 610 and SB 221 to ensure that adequate water supplies are available before approval of certain development. The General Plan Update (Natural Resources Conservation; Climate Change and Sustainability; and Community Services, Parks, and Recreation Elements) includes goals and policies regarding water conservation and efficiency and recycled water use that would reduce the consumption of water both for potable uses and irrigation. Also, publicly adopted water conservation actions due to the current drought, as well as increased availability of recycled water for irrigation and other nonpotable uses, further reduce potable water consumption, increasing the City’s potable water supply portfolio and reducing wastewater generation rates. With adherence to the policies and regulations described in the General Plan Update, impacts would be less-than-significant regarding the need for relocation or construction of new or expanded water facilities, and no mitigation is required.

**Project Analysis**

The proposed Project consists of the pre-zoning for approximately 66 acres and the annexation of approximately 51.5 acres into the City of Napa boundaries, consistent with the 2040 General Plan. No new development or construction would be authorized with approval of the Project. Moreover, the potential adverse effect relating to new or expanded water facilities were adequately evaluated in Section 3.17.2 of the General Plan EIR, and determined to be less than significant. As such, the Project would not result in any new or more severe impacts to water supply infrastructure than were identified in the General Plan FEIR, and no further environmental review is required.

**b) Effects on Wastewater Treatment Facilities**

The General Plan Update EIR determined that due to completed upgrades to the WWTP system in the past 10 years, the existing WWTP has capacity to handle projected residential, commercial, and industrial water demands through 2030. Furthermore, publicly adopted water conservation actions, state and local water conservation mandates, and

increased use of recycled water would continue to reduce demand on the current WWTP system. Also, prior to project approval, future proposed projects would be required to undergo CEQA review, and the City would require all new development to comply with all drought and water conservation requirements set forth under state and local regulations, which would further reduce wastewater generation in NapaSan's service area. The General Plan includes goals and policies relevant to water conservation and wastewater system maintenance that would help reduce the amount of wastewater generated and reduce the demand on existing service (NRC 9-1, NRC-10, NRC 10-1, NRC 10-2, CCS 3-4, CCS-5, CCS 5-1, CCS 5-2, CCS 5-3, CCS 5-5, CCS 5-6, CCS 5-7, CCS 5-8, CCS 7-6, CCS-3, CCS 3-4, CCS-5, CCS 5-5, and CCS 7-8). Therefore, the General Plan Update EIR found that impacts related to wastewater treatment requirements, wastewater facilities, and wastewater capacity would be less than significant, and no mitigation measures were required.

### **Project Analysis**

The General Plan Update EIR determined that the existing WWTP has capacity to handle projected residential, commercial, and industrial water demands through 2030. The proposed Project would not result in greater growth on the Project Site than anticipated by the General Plan Update EIR. In addition, the proposed Project would be required to comply with all drought and water conservation requirements set forth under state and local regulations, which would further reduce wastewater generation, and would comply with the goals and policies of the General Plan discussed above that are relevant to water conservation and wastewater system maintenance that would help reduce the amount of wastewater generated and reduce the demand on existing service. Therefore, the proposed Project would not result in any new or more severe impacts to wastewater treatment, facilities, or capacity than were identified in the General Plan Update EIR.

#### **c) Effects on Electric Power, Natural Gas, and Telecommunications Facilities**

The General Plan Update EIR (Impact UT-1) states that Napa's population is expected to continue growing, which will increase the demand on current infrastructure for electricity, natural gas, and telecommunications. If demand increases to the extent that infrastructure or a facility of a service provider, such as that of PG&E, the Western Area Power Administration, or telecommunications providers, must be relocated or expanded, the expansion could result in significant impacts on the environment. Future expansion or construction projects of electric, natural gas, and telecommunications lines and facilities would be required by law to operate in compliance and under permits of the City, and/or the governing bodies of those utilities, such as the Federal Energy Regulatory Commission, California Public Utilities Commission, and FCC, prior to approvals. Current city, state, and federal rebate and incentive programs on energy efficient products and measures also contribute to efforts to reduce energy consumption and demand.

The General Plan Update focuses on sustainability with a goal to reduce Napa's carbon footprint in consideration of the impact that new development and projected population growth could have on the environment by implementing sustainable design measures and policies. The General Plan Update also supports policies to help ensure that Napa residents have reliable access to power. The General Plan Update contains goals and policies related to utilities and energy savings that would reduce the Project's impact on the current electricity, natural gas, and telecommunications providers. Therefore, with adherence to the policies and regulations, the approval of the General Plan Update would result in a less-than-significant impact regarding the need for relocation or construction of new or expanded electric power, natural gas, or telecommunications facilities, and no mitigation is required.

### **Project Analysis**

The proposed Project consists of the pre-zoning for approximately 66 acres and the annexation of approximately 51.5 acres into the City of Napa boundaries, consistent with the 2040 General Plan. No new development or construction would be authorized with approval of the Project. In addition, the Project's potential adverse effects relating to electric power, natural gas, and telecommunication facilities were adequately evaluated in Section 3.17.2 of the General Plan EIR, and determined to be less than significant. As such, the overall impacts on electrical, natural gas, or telecommunication facilities would be less than significant, and no mitigation measures are

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required. Accordingly, no new significant impacts or substantially more severe impacts related to electrical, natural gas, or telecommunication facilities have been identified for the Project.

### d) Solid Waste

The General Plan Update EIR determined that projected population growth would lead to additional demands for solid waste disposal services. However, the Potrero Hills Landfill in Suisun City is expected to have adequate capacity until at least 2044. In addition, implementation of state laws and policies to reduce the waste stream and extend the lifespan of the landfill, such as AB 341, are expected to extend the capacity. Furthermore, the General Plan includes goals and policies that support efforts to achieve a high level of waste diversion, minimize the generation of waste, increase recycling, encourage composting, and provide for the collection and disposal of solid waste (CCS 1-2, CCS-4, CCS 4-1, CCS 4-2, CCS 4-3, CCS 4-4, C SPR-7, C SPR 7-1, C SPR 7-2, C SPR-8, C SPR 8-1, C SPR 8-2, C SPR 8-3, C SPR 8-4, C SPR 8-5, C SPR 8-6, and C SPR 8-7). Also, future development in the City would be required to undergo separate environmental review under CEQA to ensure adequate landfill capacity to serve new development prior to approval. Therefore, the General Plan Update EIR determined that impacts related to solid waste would be less than significant and no mitigation was required

### Project Analysis

The General Plan Update EIR concluded that the Potrero Hills Landfill in Suisun City is expected to have adequate capacity until at least 2044. . Any future development of the Project site would be consistent with the type of development allowed by the Medium Density Residential designation under the General Plan and would not result in greater growth on the project site than anticipated by the General Plan Update EIR. Therefore, the proposed Project (and any future development) would not result in any new or more severe impacts to solid waste than were identified in the General Plan Update EIR.

### CEQA Conclusions

The General Plan Update EIR adequately evaluated the potential utilities and service systems impacts for the proposed Project. Therefore, potential impacts would be less than significant and additional mitigation is not required.

### Wildfire

Would the Project: If located in or near state responsibility areas or lands classified as Very High Fire Hazard Severity Zones:	Napa 2040 General Plan Update EIR Findings	Relationship to Napa 2040 General Plan Update EIR Findings:			Project Conclusions:
		Equal or Less Severe	Adequately Addressed in General Plan EIR	New or Substantially More Severe	Resulting Level of Significance
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	LTS	■	■	□	LTS
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrollable spread of a wildfire?	LTS	■	■	□	LTS

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c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risks or that may result in temporary or ongoing impacts to the environment?	LTS	■	■	□	LTS
d) Expose people or structures to significant risk, including downslope or downstream flooding or landslides from runoff post-fire slope instability, or drainage changes?	LTS	■	■	□	LTS

**a) Emergency Response or Evacuation Plan.**

The General Plan Update EIR determined that development under the General Plan, including new land uses and increased densities, has the potential to create obstacles to the implementation of emergency response or evacuation plans adopted for the City of Napa including the Napa County Emergency Operations Plan and the Napa County Operational Area Hazard Management Plan. However, the General Plan includes policies and implementing actions that would address the reduction of risk due to hazards which would reduce the impact of new development on emergency response plans (Policies SN 5-1, SN 5-2, SN 5-4, SN 5-5). Therefore, the General Plan Update EIR concluded that adherence to existing regulations and the policies in the General Plan would reduce potential impacts to emergency response plans or emergency evacuation plans to less than significant and no mitigation is required.

**Project Analysis**

The General Plan Update EIR determined that the Planning Area, including the Project site, has been designated as a non-Very High Fire Hazard Severity Zone (VHFHSZ). As discussed in the General Plan EIR, in Sections 3.8.2 and 3.18.2, the Project will not substantially impair an adopted emergency response plan or evacuation plan. Additionally, the proposed Project would be subject to General Plan Policies SN 5-4 and SN 5-5, which require future development plans to provide adequate evacuation routes and the assessment of the adequacy of emergency response and evacuation routes and identification of the need for any road extensions to serve neighborhoods that do not have sufficient evacuation routes or access for emergency services. Therefore, the proposed Project would have a less than significant impact on the implementation of an adopted emergency response plan or emergency evacuation plan. The proposed Project would not result in any impacts related to emergency response or evacuation plans that are new or more significant than those analyzed in the General Plan Update EIR.

**b) Exacerbate Wildfire Risks.**

The General Plan Update EIR determined that the Planning Area has been designated as non-VHFHSZ. Given that the General Plan’s Planning Area is largely urbanized and paved, wildfire threats within City limits are minimal. Additionally, the General Plan includes several policies that would address potential fire hazards (SN 5-1, SN 5-2, SN 5-3, SN 5-4, SN 5-5, and SN 5-6). Furthermore, development projects would be subject to CBC standards and undergo review by the Napa Fire Department. Therefore, the General Plan Update EIR concluded that the exacerbation of wildfire risks, including exposure of project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire would not occur, and impacts would be less than significant.

**Project Analysis**

The Project Site is generally level and is bound by existing development on three sides. Additionally, the proposed Project would be subject to several General Plan policies that would address potential fire hazards (SN 5-1, SN 5-2, SN 5-3, SN 5-4, SN 5-5, and SN 5-6), would be subject to California Building Code standards, and would undergo

review by the Napa Fire Department. Therefore, the proposed Project would not exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire, and this impact would be less than significant. The proposed Project would not result in any impacts related to wildfire risks that are new or more significant than those analyzed in the General Plan Update EIR.

### **c) Associated Infrastructure that may Exacerbate Fire Risk.**

The General Plan Update EIR determined that the planning Area is in a non-VHFHSZ. Although implementation of the General Plan would allow future development that may require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk, future discretionary projects would be evaluated for project-specific wildfire impacts at the time they are proposed. Additionally, as discussed above, there are several General Plan policies that address potential fire hazards and development projects would be subject to CBC standards and undergo review by the Napa Fire Department. Therefore, the General Plan Update EIR concluded that impacts from associated infrastructure would not exacerbate fire risk or result in temporary or ongoing impacts to the environment, and impacts would be less than significant.

### **Project Analysis**

The proposed Project consists of the pre-zoning for approximately 66 acres and the annexation of approximately 51.5 acres into the City of Napa boundaries. No new development or construction would be authorized with approval of the Project. In addition, and as discussed in the General Plan EIR, in Section 3.18.2, the Project's effects relating to associated infrastructure that may exasperate fire risks were determined to be less than significant. As such, the overall impacts on wildfire impacts associated with the installation or maintenance of associated infrastructure would be less than significant, and the proposed Project would not result in any impacts that are new or more significant than those analyzed in the General Plan Update FEIR.

### **d) Expose People or Structures to Significant Risks.**

The General Plan Update EIR determined that the City's topography is relatively flat with the eastern and western sides increasing in elevation into the foothills. The Planning Area is not designated as being located within a VHFHSZ by CAL FIRE., some densely developed areas along the perimeter of the Planning Area are particularly susceptible to damage from wildfires. However, the General Plan seeks to concentrate new development along key corridors, in Downtown, and selected additional opportunity sites while infusing existing neighborhoods with focused infill development. Future development as a result of the General Plan would not exacerbate downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or other related risks as development would not be encouraged in areas susceptible to these risks. Additionally, as discussed above, there are several General Plan policies that address potential fire hazards, and development projects would be subject to CBC standards and review by the Napa Fire Department. Therefore, the General Plan Update EIR concluded that risks from downslope or downstream flooding or landslides, because of runoff, post-fire slope instability, or drainage changes would be less than significant, and no mitigation would be required.

### **Project Analysis**

The Project site is relatively flat and would not exacerbate downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or other related risks as development would not occur in areas susceptible to these risks. Therefore, impacts would be less than significant, and the proposed Project would not result in any impacts that are new or more significant than those analyzed in the General Plan Update EIR.

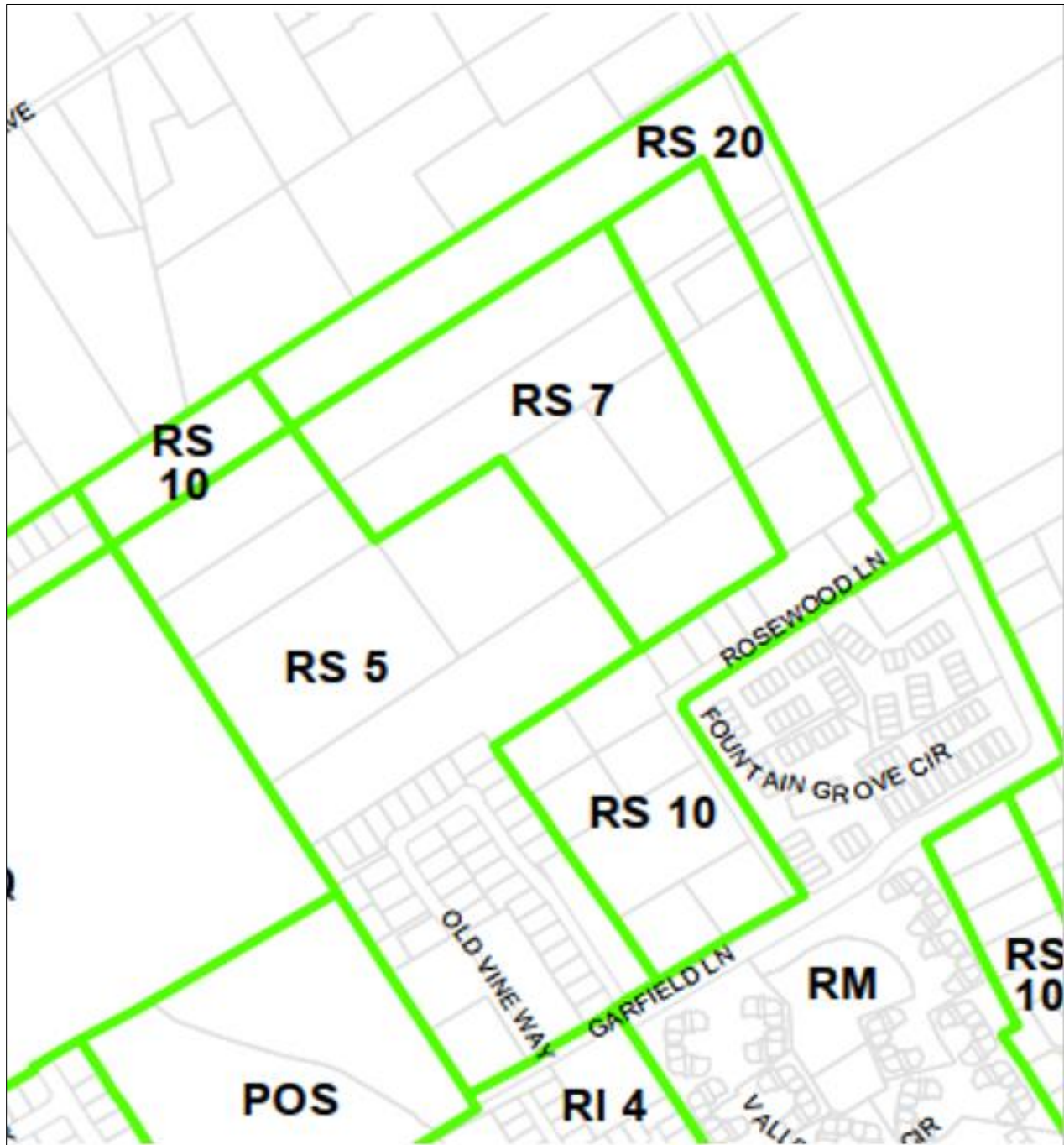
### **CEQA Conclusions**

The General Plan Update EIR adequately evaluated the potential impacts related to wildfire of the proposed Project and no new impacts would result.

**EXHIBIT "C"**

**CHAPTER 17.31 MP – [X] DISTRICT (RESERVED)**

EXHIBIT "D1"



**EXISTING ZONING MAP FOR:**

APNs 038-240-005, 038-240-006, 038-240-014, 038-240-015,  
038-240-020, 038-240-022, 038-240-023, 038-160-023, 038-160-024,  
038-160-025, 038-160-026, 038-160-029



EXHIBIT "D2"

