



# ENVIRONMENTAL MEMORANDUM

**PREPARED BY:** PAUL O'NEILL, ASSOCIATE PLANNER  
**DATE:** June 16, 2026  
**SUBJECT:** CLASS 32 (INFILL DEVELOPMENT) EXEMPTION DETERMINATION  
808 CAPITOLA DRIVE TENTATIVE SUBDIVISION MAP (PL25-0036)

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## Project Overview:

The Applicant proposes to subdivide an approximately 1.46-acre parcel into eight (8) single-family lots, construct eight (8) new single family residential homes with associated site and landscape improvements including retaining walls over three (3) feet in height, and construct an extension of Capitola Drive connecting the northern and southern sections of the Street at 808 Capitola Drive. The Project Site is mostly vacant, containing an existing single-family home and filled-in swimming pool, both of which would be removed with the Project. The eight (8) new single-family homes would be accessed by a new private street from the extension of Capitola Drive.

The eight (8) proposed single family residential homes would be between approximately three thousand one hundred and eight (3,108) square feet and three thousand eight hundred and twenty (3,820) square feet. Each unit in the Project would be a unique design, including three (3) to four (4) bedrooms and would include an attached or detached garage.

The Project Site is moderately sloped. The proposed retaining walls are required to provide level building pads for the proposed units. Primarily located at the perimeter of the Site, the walls would be minimally visible from the public right of way.

The extension of Capitola Drive would be constructed consistent with the City's established roadway standards. A sixty (60) foot right of way would be provided allowing the provision of street parking along both sides of the roadway and standard curb, gutter, planting strips, and sidewalks, consistent with the rest of the roadway network to the north and to the south of the Project Site.

## The CEQA Class 32 Exemption Criteria:

In accordance with CEQA Guidelines Section 15332, the Project qualifies for a Class 32 Exemption because it meets all five of the following criteria:

- (a) **The Project Site is Consistent With the Applicable General Plan Designation and all Applicable General Plan Policies as well as With Applicable Zoning Designation and Regulations:**

General Plan

The Project Site is designated Low Density Residential under the Napa 2040 General Plan. According to the General Plan, this designation is intended to provide for detached single family dwellings and compatible uses like residential care facilities and home day cares.

The Project would meet several of the Napa 2040 General Plan Goals and Policies, including the following:

Land Use and Community Design Element (“LUCD”)

- Goal LUCD-1: Maintain a compact urban form to promote a distinct community identity and protect open space and natural and agricultural resources surrounding the community.

Staff Analysis: The Project Site is in an infill parcel, surrounded by developed urban uses, and would be developed consistent with the Site’s surroundings. The Project would provide additional housing units without having an impact on open space, natural, or agricultural resources.

- Policy LUCD 1-1: Focus urban development to be within the voter-approved Rural Urban Limit (RUL) to provide for the protection of the surrounding open space and agriculture uses.

Staff Analysis: The Project Site is located within the RUL protecting surrounding open space and agricultural uses.

- Policy LUCD 1-2: Promote efficient land use patterns to accommodate projected housing and job growth within the SOI, including by ensuring that development is within the stipulated density (minimum and maximum) range.

Staff Analysis: The Project would provide a residential density at the upper end of the range required for the Low Density Residential General Plan Designation, efficiently utilizing a smaller infill parcel. The density of the proposed Project is consistent with the surrounding neighborhood.

- Goal LUCD-3: Enhance Napa’s community character by promoting walkability, inclusivity, and connections between neighborhoods, key centers, and the Napa River.

Staff Analysis: The Project would include the connection of the upper and lower sections of Capitola Drive improving the roadway and sidewalk network for the wider area. This connection would promote walkability and create connections across the neighborhood.

- Policy LUCD 3-1: Promote development that fosters a sense of community by providing safe, pedestrian friendly, tree-lined streets; walkways to everyday destinations such as schools, bikeways, trails, parks, and stores; buildings that exhibit visual diversity,

pedestrian-scale, and street orientation; central gathering places; and recreational amenities for a variety of age groups.

Staff Analysis: As described in Goal LUCD-3, the Project would include a significant roadway connection that would provide many benefits for the surrounding community. The extension of Capitola Drive would be designed consistent with the City's Street standards, providing street trees and separated sidewalks. In addition, while not located within the Soscol South Focus Area, this connection of Capitola is shown in Figure 2-7 of the General Plan and would advance accessibility goals in the wider vicinity of the Project Site.

- Goal LUCD-10: Enhance the City's character and image as a desirable residential, active, and sustainable community, and celebrate the diversity of residents.

Staff Analysis: The Project would provide the development of eight new single-family homes. These "family sized" units would provide additional housing options and would help create a desirable, active, and sustainable residential community.

#### Transportation Element ("TE")

- Goal TE-1: Foster a comprehensive network of safe, accessible roads, trails, sidewalks, and pathways that emphasize a Complete Streets approach, while reducing vehicle miles traveled (VMT) and dependence on single-occupancy vehicles.

Staff Analysis: As mentioned above, the connection of Capitola Drive is proposed with the Project. Roadway connections like this reduce vehicle miles traveled and provide for shorter biking and walking distances. In addition, the street connection would be designed with current City standards, including 10-foot sidewalks (please see Public Works Condition of Approval #30), a complete streets approach.

- Policy TE 1-2: Foster a more connected system of streets, pedestrian facilities, and bicycle facilities as new development and redevelopment is undertaken, or as opportunities are presented.

Staff Analysis: The Project presents an opportunity to complete this connection of Capitola Drive as the Site is one of last remaining, undeveloped parcels in the area and the only remaining parcel blocking the full extension of the Street.

#### Zoning

The Project Site is zoned RI-5, Single Family Infill. Pursuant to NMC Section 17.62.020 single-family detached residential homes, like those proposed with the Project, are permitted in the District. The eight (8) parcels and homes proposed with the Project would be consistent with the property development standards for the District and provisions for Small Lot Development (NMC Section 17.52.470), Flag Lot Development (NMC Section 17.52.190), and minor increases in height permitted to allow consistency with the City's *Design Guidelines* (NMC Section 17.62.050).

The Project is consistent with the applicable General Plan designation and Zoning regulations for the site. The recreational facilities are compatible with existing retail uses within the shopping center and contribute to the site's intended function as a

community-serving area. No zoning variances are needed, and the Project complies with the existing land use policies.

**(b) The Proposed Development Occurs Within City Limits on a Project Site of no More Than Five Acres Substantially Surrounded by Urban Uses:**

The Site is located within the city limits on an approximately 1.46-acre parcel, within the maximum allowable acreage for the Class 32 exemption (five (5) acres). The Site is surrounded by urban development, established residential neighborhoods surround the Site on all sides.

Considering the Project in relation to the neighboring Project to the north (PL23-0151; CC Resolution No. R2024-115), the total size of the two project sites combined is approximately 2.81-acres, below the five-acre threshold. Both Sites are substantially surrounded by urban uses.

**(c) The Project Site has no Value as Habitat for Endangered, Rare, or Threatened Species:**

The Project is located on a previously disturbed Site with little vegetation beyond ruderal grasses and a few native and non-native trees. The property is not shown to have critical habitat for endangered, rare, or threatened species on the *United States Fish and Wildlife Service (USFWS) Threatened & Endangered Species Active Critical Habitat* map and is shown to be developed with impervious surface on the *National Land Cover Database 2021 Percent Developed Imperviousness* map. Additionally, the Project Site is located within an urbanized area, surrounded by other residential development, roadways, and other non-natural land uses. Given its existing disturbance and lack of natural habitat, it is reasonable to conclude that the site does not provide habitat for sensitive species.

**(d) Approval of the Project Would not Result in any Significant Effects Relating to Traffic, Noise, Air Quality, or Water Quality:**

Approval of the Project will not result in significant effects related to traffic, noise, air quality, or water quality. The site is located within an existing urbanized area, and the proposed residential use is expected to have a minimal environmental impact:

Traffic

The City's Vehicle Miles Traveled (VMT) thresholds were adopted by the City Council on May 4, 2021, by Resolution R2021-033. The City utilizes that Solano Napa Activity Based Model (SNABM) for VMT analysis, including the *Countywide Traffic Analysis Zone Baseline VMT Per Capita and VMT per Employee Map*. For residential projects, the City considers a project exceeding a level of 15% below existing regional VMT per capita as potentially having a significant transportation impact. Using the California Governor's Office of Planning and Research's *Technical Advisory on Evaluating Transportation Impacts in CEQA*, Staff was able to determine that both the Project itself, and any cumulative impact from both the proposed Project and the neighboring project to the north, screens out from needing to prepare a detailed VMT analysis. On page 12 the *Technical Advisory on Evaluating Transportation Impacts in CEQA* states that:

"Residential and office projects that locate in areas with low VMT, and that incorporate similar features (i.e., density, mix of uses, transit accessibility), will tend to exhibit similarly low VMT. Maps created with VMT data, for example from a travel survey or a travel demand model, can illustrate areas that are currently below threshold VMT. Because new developments in such locations would likely result in a similar level of VMT, such maps can be used to screen out residential and office projects from needing to prepare a detailed VMT analysis." Both the Project Site and the site to the north are within an area that has 50% to 85% of the Napa County mean VMT per capita. As such they screen out from needing VMT analysis.

In addition, Staff also reviewed the Project against local Level of Service (LOS) requirements. While no longer a requirement under CEQA, Level of Service is still a local policy included in the Transportation Element of the *City of Napa 2040 General Plan*. The City's *Policy Guidelines for Traffic Impact Analysis for Private Development Review* establish thresholds for LOS analysis. Residential projects that generate more than 50 peak hour trips and non-residential projects that generate more than 100 peak hour trips require analysis.

Using the *Institute of Transportation Engineer's (ITE) Trip Generation Manual, 11<sup>th</sup> Edition* single family detached housing (Land Use Code 210) is expected to generate 9.43 daily trips and 0.7-0.94 peak hour trips per unit. As a result, the Project is expected to generate 75 daily trips (9.43 x 8 dwelling units) and 6-8 peak hour trips (0.7-0.94 x 8), well below this significance threshold. When combined with the project to the north, the combined projects would generate 12-16 peak hour daily trips, also well below the significance threshold. These calculations are expressed in the Table below:

Project Name	Land Use (ITE Code)	Dwelling Units (DU)	Daily Rate (per DU)	Daily Trips	AM Peak Hour Rate (per DU)	AM Trips	PM Peak Hour Rate (per DU)	PM Trips
Harvest Village II	Single Family Detached (210)	9	9.43	85	0.7	6	0.94	8
808 Capitola Drive		8	9.43	75	0.7	6	0.94	8
<b>TOTAL</b>				<b>160</b>		<b>12</b>		<b>16</b>

In addition, all required public frontage and street improvements included in the Project would be designed and built in accordance with the Public Works Department's *Standard Plans and Specifications*. No transportation impacts would result from roadway design.

### Noise

The Project's noise impacts would be minimal. As residential uses the noise generated by the eight (8) new residential units will not exceed the thresholds established in the City's Noise Ordinance (NMC Chapter 8.08) and the *General Plan*. Noise generated by construction activity would need to comply with NMC Section 8.08.025.

### Air Quality

Air quality impacts are expected to be minimal and consistent with regular residential development. Staff utilized the Bay Area Air Quality Management District's *Multi-Land Use Screening Tool* to analyze potential air quality impacts from the Project both during construction and when units are operational. This included cumulative impacts when combined with the project by a separate Applicant to the north of the Site (PL23-0161).

Air quality impacts were found to be below construction and operational thresholds for both the individual and combined Projects. Temporary construction-related emissions (e.g., dust) will be controlled with standard conditions, ensuring air quality standards are met.

### Water Quality

The Project will comply with existing stormwater management measures, ensuring that the Project does not result in adverse water quality impacts. No additional mitigation is required beyond what is already in place for the Project.

**(e) The Site can be Adequately Served by all Required Utilities and Public Services:**

All units in the Project would be served by the existing utilities and public services including public water and sewer and PG&E power.

### **Conclusion:**

The Project qualifies for a Class 32 (Infill Development) Exemption under CEQA, as it meets all five criteria outlined in CEQA Guidelines Section 15332. Specifically:

- (a) The Project is consistent with the general plan and zoning regulations, with recreational uses that are compatible with the existing retail setting.
- (b) The Project site is located within the city limits, less than five (5) acres in size, and is surrounded by urban development, ensuring it meets the infill development requirements.
- (c) The Site is located in an urbanized area, was previously disturbed, and contains little vegetation making it unlikely to support sensitive species or habitats. This is further supported by the dense, urbanized residential development surrounding the Site.
- (d) The Project will not result in significant environmental effects. Vehicle miles traveled would be reduced by the roadway connection proposed with the Project. Additionally, the Project's noise, air quality, and water quality impacts would be abated by existing city policies.
- (e) The Project would be adequately served by all utilities and public services.

Given the Project's alignment with these criteria, we conclude that the Project will not result in any significant new environmental impacts. The Project is appropriately exempt from further CEQA review under Class 32. None of the exceptions to categorical exemptions identified in Section 15003.2 are present or would apply to the Project.

Furthermore, consistent with CEQA Guidelines Section 15300.2(b), staff evaluated the potential cumulative impacts of the proposed project in conjunction with adjacent subdivision to the north (PL23-0151; CC Resolution No. R2024-115).

1. The combined site conforms to all applicable policies and regulations.

2. The acreage for the project site combined with the adjacent subdivision would still fall under five acres, lie within city limits, and are surrounded by urban uses.
3. No habitat for special-status species exists on-site.
4. No significant traffic, noise, air quality, or water quality impacts will result from the cumulative development.
5. Both projects are adequately served by infrastructure and services.
6. No unusual circumstances or sensitive resources have been identified that would elevate the level of environmental review required.

Therefore, even when considered collectively, the proposed project and the subdivision entitlement satisfy the criteria for the Class 32 (Infill) categorical exemption under CEQA Guidelines Section 15332, and no further CEQA review is warranted.