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Initial Study/Negative Declaration

**COUNTY OF NAPA
PLANNING, BUILDING AND ENVIRONMENTAL SERVICES DEPARTMENT
1195 THIRD STREET SUITE 210
NAPA, CA 94559
(707) 253-4417**

**Initial Study Checklist
(form updated January 2019)**

1. **Project Title:** Wrights Corner Use Permit Modification P22-00241
2. **Property Owner:** The Wright Corner, Inc., 4370 (also addressed as 4372 and 4374) Old Sonoma Highway, Napa CA 94559.
thewrightcorner@earthlink.net
3. **County Contact Person, Phone Number and email:** Kelli Cahill, Planner III, (707) 265-2325, kelli.cahill@countyofnapa.org
4. **Project Location and Assessor's Parcel Number (APN):** 4370 (also addressed as 4372 and 4374) Old Sonoma Hwy, Napa, CA;
047-110-017-000
5. **Project sponsor's name and address:**

Kerry Smith
4370 Old Sonoma Hwy
Napa, CA 94559

6. **General Plan description:** Agriculture, Watershed and Open Space (AWOS) and Agricultural Resources (AR)
7. **Zoning:** Commercial Limited (CL)
8. **Background/Project History:**

The Wright Corner, also often called Wrights Corner, is a commercially zoned parcel in the Carneros region located at the southeast corner of Old Sonoma Road and Old Sonoma Highway. The structures on the property with the exception of the residence were constructed in the 1890s, and were once home to a gas station, then a general store, and later a bar. The exact timing of the businesses closing is not known, but the property fell into disrepair for decades creating a neighborhood nuisance. In the early 1980s a series of use permit entitlements were filed in an attempt to redevelop and revitalize the property.

1980 Use Permit filed requesting Recreational Vehicle Storage Yard, which was not processed.

U-348283 (May 4, 1983) Use Permit approval of a Furniture Sales Room and Workroom with the addition of a new accessory residence consisting of:

- 2,000 square feet (sf) (approved, but 1,900 sf as existing) furniture sales building at the corner of Old Sonoma Road and Old Sonoma Highway (Hwy);
- 1,490 sf warehouse and workroom building on Old Sonoma Road east of the main building;
- 8 parking spaces for the furniture business;
- 2,860 sf single family residence allowed as accessory use to the furniture use (CL zoning allows housing accessory to a commercial use);
- 3 employees; and
- Private well and engineered septic system.

1984 Bed and Breakfast Use Permit granted for 2 bedrooms within the residence

- On September 1, 1985, the applicant requested to terminate the bed and breakfast permit. This permit is null and void.

P14-00022 (May 6, 2014) Use Permit Major Modification approval to convert the 1,448 square foot antique furniture store's warehouse and workshop building to the following uses:

- A 340 square foot art gallery (for display and sale of art);
- A 788 square foot bike rental/guided tour/luxury tour car staging business;
- A 332 square foot shared storage area for all three businesses (art gallery, bike rental, furniture store);
- Ancillary retail sales of riding gear, pre-packaged food and convenience items for the bike rental/guided tour business;
- No changes to the existing 1,900 square foot main furniture store building, and no changes to the approved 2,860 square foot single family residence (Use Permit U-348283); and
- Amend Use Permit U-348283 Conditions of Approval #14 to allow a maximum of three marketing events to allow auctions, art fairs or similar temporary events annually with a maximum of 50 guests in attendance between 9:00 am and 6:00 pm.

9. **Description of Project:**

Approval of a Major Modification to the previous project approvals (Use Permit U-348283 and Modification P14-00022-MOD) as described above to allow the following:

1. Convert the existing 2,738 sf three (3) bedroom single-family residence (referred to as 4374 Old Sonoma Highway) into a Guest Inn with eight (8) rooms including five (5) new free standing guest units/cottages at 635 sf per unit for a total 3,175 sf;
2. Convert the existing 1,447 sf bike rental/guided tour and luxury tour car staging business, (referred to as 4370 Old Sonoma Highway) into a beer and wine Tavern with up to 34 seats indoors and up to 48 seats outdoors for a maximum of 82 total seats;
3. Convert the existing 1,917 sf furniture store with art, antique, and retail products, (referred to as 4372 Old Sonoma Highway) to general mercantile retail of goods, products, pre-packaged foods and alcoholic beverage sales with ancillary wine tastings indoors and in a new 450 sf outdoor patio area;
4. Construct a new 130 sf concrete pad for a new concession trailer, (known herein as the Coffee Cart) for the sale of coffee and morning snacks;
5. Construct a 397 sf new restroom and storage structure to service the property;
6. Days and Hours of operation for the various uses would be as follows:
 - a. Bar/Tavern 4370 Old Sonoma Hwy – 11:00 am to 7:00 pm, seven (7) days a week for 50 weeks per year
 - b. Mercantile Store 4372 Old Sonoma Hwy– 10:30 am to 6:00 pm, five (5) days a week for 50 weeks per year
 - c. Guest Inn 4374 Old Sonoma Hwy – would operate 24 hours a day, seven (7) days a week
 - d. Coffee Cart – 5:30 am to 10:30 am seven (7) days a week for 50 weeks per year
7. Increase employees from three (3) full-time employees to eight (8) full-time employees;
 - a. Bar/Tavern 4370 Old Sonoma Road – 4 full time employees
 - b. Mercantile Store 4370 Old Sonoma Hwy – 2 full time employees
 - c. Guest Inn 4374 Old Sonoma Hwy - 1 full time employee
 - d. Coffee Cart – 1 full time employee
8. Increase the number of existing events to include the existing three (3) for the Mercantile store and proposed four (4) events per month with a maximum number 85 people for the Guest Inn only between 11:00 am to 9:00 pm. The Tavern and Mercantile will not be open during schedule events for the Guest Inn only; and will be held in a designated area east of the bathroom/storage buildings.
9. Increase parking with 28 new spaces for a total of 36 parking spaces;
10. ten (10) park bicycle parking spaces with four (4) covered spaces
11. Widening of the existing driveway to meet the commercial driveway Napa County Roads and Street Standards;
12. Grading and site improvements to accommodate new parking areas;
13. Upgrade to the septic system prior to conversion of the residence to Guest Inn; and,
14. Onsite landscaping.

The proposed uses herein, which occupy separate structures shall be identified by use, and address as follows:

- 4370 Old Sonoma Highway – Tavern
- 4372 Old Sonoma Highway – Mercantile
- 4374 Old Sonoma Highway – Guest Inn
- Mobile Concession Trailer – Coffee Cart

10. **Describe the environmental setting and surrounding land uses.**

The project site is approximately 2.35-acres, located at 4370 Old Sonoma Highway, west of the City of Napa. The property is located within the Los Carneros area of incorporated Napa County, approximately 2.5 miles southwest of the City of Napa. The project site is currently developed with a single-family residence, 12,500-gallon water storage tank, septic system, two buildings operated as businesses approved under Use Permit P14-00022-UP for an Art Gallery and antique store, bike rental/guided tour business and luxury car excursion with parking. The parcel sits on a relatively flat area with increasing slopes towards the northeast portion of the parcel. Slopes on the property range from 5% at the corner of Old Sonoma Road and Old Sonoma Highway, and increasing to the northeast with a small area greater than 20%. The project site has been identified as developed; however, aerial photos show a few oak trees and landscaping with grasses making up the vegetation cover on the undeveloped areas. Carneros Creek is located approximately 450 feet to the west of the property, which is considered a significant stream, and is discussed further in the Hydrology and Water Quality Section. The water source for the existing and proposed uses comes from an onsite groundwater well. There is an existing septic system that will serve the proposed Mercantile and Tavern, with upgrades proposed in conjunction with development of the Guest Inn, and discussed further in the Hydrology and Water Quality Section.

The surrounding area consists of single-family homes, vineyards, wineries, Carneros Inn Resort, and farm management use, with the nearest residence being approximately 20 feet to the south of the shared property line.

11. **Other agencies whose approval is required** (e.g., permits, financing approval, or participation agreement).

The project would also require various ministerial approvals by the County, including but not limited to building permits, grading permits, waste disposal permits, and an encroachment permit, in addition to meeting CalFire standards. Permits may also be required by the Department of Alcoholic Beverage Control and Bureau of Alcohol, Tobacco, & Firearms.

Responsible (R) and Trustee (T) Agencies

California Department of Fish & Wildlife (T)

Other Agencies Contacted

None

12. **Tribal Cultural Resources.** Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resource, procedures regarding confidentiality, etc.?

On May 22, 2024, County Staff sent invitations to consult on the proposed project to Native American tribes who had a cultural interest in the area and who as of that date had requested to be invited to consult on projects, in accordance with the requirements of Public Resources Code section 21080.3.1. Staff did not receive a response for consult or to provide comments.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

ENVIRONMENTAL IMPACTS AND BASIS OF CONCLUSIONS:

The conclusions and recommendations contained herein are professional opinions derived in accordance with current standards of professional practice. They are based on a review of the Napa County Environmental Resource Maps, the other sources of information listed in the file, and the comments received, conversations with knowledgeable individuals; the preparer's personal knowledge of the area; and, where necessary, a visit to the site. For further information, see the environmental background information contained in the permanent file on this project.

Other sources of information used in the preparation of this Initial Study include site specific studies conducted by the applicant and filed by the applicant in conjunction with Use Permit Major Modification P22-00241 as listed below, and the environmental background information contained in the permanent file on this project. These documents and information sources are incorporated here by reference and available for review at the Napa County Department of Planning, Building, and Environmental Services located at 1195 Third Street, Suite 210, Napa CA 94559."

- Application & Project Description (Attachment E)
- Project Plan Set (Attachment F)
- Transportation Impact Study (Attachment G)
- Waste Water Feasibility Report (Attachment H)
- Water Availability Analysis (Attachment I)
- Storm Water Control Plan (Attachment J)
- Archaeological Resource Management Report (confidential) (Attachment K)
- Napa County Geographic Information System (GIS) sensitivity maps/layers

On the basis of this initial evaluation:

- ☒ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



Signature

March 12, 2025

Date

Name: Kelli Cahill, Planner III

Napa County
Planning, Building and Environmental Services Department

I.	AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
a)	Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c)	In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion:

a-c. Visual resources are those physical features that make up the environment, including landforms, geological features, water, trees and other plants, and elements of the human cultural landscape. A scenic vista, then, would be a publicly accessible vantage point such as a road, park, trail, or scenic overlook from which distant or landscape-scale views of a beautiful or otherwise important assembly of visual resources can be taken in. As generally described in the Environmental Setting and Surrounding Land Uses section above, the area is defined by a mix of the winery development, vineyards, rural residential structures, Carneros Inn lodge, and a farm management business.

The property is currently developed with three structures including a single-family residence and two commercial structures. The two commercial structures include art gallery (display and sale), bike rental/guided tour business and luxury car excursion, shared storage area for all three business, sale of riding gear, pre-packaged food and convenience items, and employee bathrooms located in an adjacent existing structure.

The proposed project include conversion of three existing structures to include a Tavern, Mercantile that will include wine tastings, conversion of the existing three (3) bedroom residence into an eight (8) room Guest Inn with five (5) stand-alone guest units with associated parking and related infrastructure improvements.

Physical changes requested in this modification include the construction of five (5) 635 sf guest units for the proposed Inn, construction of a 397 sf restroom and storage structure, and the installation of a code compliant septic system, all other improvements are proposed within the existing development footprint. There are four (4) existing entrances to the property that serves the residence with additional access to the commercial structures and parking areas.

State Highway 12 and Old Sonoma Road are scenic corridors, with the subject property visible from Old Sonoma Road, and possibly views from State Highway 12, which are obscured by trees and existing vineyard management company storage yard. The primary view from Old Sonoma Road will not appreciably change as the development is predominately within the existing development area. The proposed restroom/storage structure will be obscured by the existing commercial structures, and the five guest cottages will be located north and adjacent to the exiting residence with one cottage visible from Old Sonoma Road.

As noted above, the project will utilize existing structures as well as construct six (6) new structures. The project will change the view of the site from Old Sonoma Road; however, it will not have a substantial adverse effect on a scenic vista or substantially degrade the existing visual character or quality of public views of the site and its surroundings. Impacts are expected to be less than significant.

d. The project proposes operational changes including increasing the number of visitors to the proposed Tavern, Mercantile and Guest Inn, private events, and full-time employees. The additional events could result in an increase in the amount and new sources of light functioning during evening and nighttime hours, however, this increase would be temporary in nature (seven times per month) and would conclude by 9:00 p.m. Additional ambient lighting is proposed for the Guest Inn to provide path lighting to the cottages. Any permanent outdoor lighting shall be installed, pursuant to standard Napa County conditions of approval, requiring outdoor lighting to be shielded and directed downwards. As subject to the standard conditions of approval below, the project would not have a significant impact resulting from new sources of lighting. Impacts are expected to be less than significant.

LIGHTING – PLAN SUBMITTAL

- a. Two (2) copies of a detailed lighting plan showing the location and specifications for all lighting fixtures to be installed on the property shall be submitted for Planning Division review and approval. All lighting shall comply with the CBC.
- b. All exterior lighting, including landscape lighting, shall be shielded and directed downward, shall be located as low to the ground as possible, shall be the minimum necessary for security, safety, or operations; on timers; and shall incorporate the use of motion detection sensors to the greatest extent practical. All lighting shall be shielded or placed such that it does not shine directly on adjacent properties or impact vehicles on adjacent streets. No flood-lighting or sodium lighting of the building is permitted, including architectural highlighting and spotting. Low-level lighting shall be utilized in parking areas as opposed to elevated high-intensity light standards.

4.9 GENERAL PROPERTY MAINTENANCE – LIGHTING, LANDSCAPING, PAINTING, OUTDOOR EQUIPMENT STORAGE, AND TRASH ENCLOSURE AREAS

- a. All lighting shall be permanently maintained in accordance with the lighting and building plans approved by the County.

Mitigation Measures: None required.

II.	AGRICULTURE AND FOREST RESOURCES. ¹ Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
	a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Important (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	c) Conflict with existing zoning for, or cause rezoning of, forest land as defined in Public Resources Code Section 12220(g), timberland as defined in Public Resources Code Section 4526, or timberland zoned Timberland Production as defined in Government Code Section 51104(g)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	d) Result in the loss of forest land or conversion of forest land to non-forest use in a manner that will significantly affect timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, or other public benefits?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

¹ "Forest land" is defined by the State as "land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits." (Public Resources Code Section 12220(g)) The Napa County General Plan anticipates and does not preclude conversion of some "forest land" to agricultural use, and the program-level EIR for the 2008 General Plan Update analyzed the impacts of up to 12,500 acres of vineyard development between 2005 and 2030, with the assumption that some of this development would occur on "forest land." In that analysis specifically, and in the County's view generally, the conversion of forest land to agricultural use would constitute a potentially significant impact only if there were resulting significant impacts to sensitive species, biodiversity, wildlife movement, sensitive biotic communities listed by the California Department of Fish and Wildlife, water quality, or other environmental resources addressed in this checklist.

Discussion:

a/b/e. The 2.35-acre project site includes three existing structures, a driveway, parking for the existing commercial uses, and landscaping. The entire parcel is designated as "Urban and Built-up Land", pursuant to the Farmland Mapping and Monitoring Program (FMMP) of the California Resources Agency. The improvements to the site including new 397 sf restroom/storage structure, five (5) cottages of 635 sf each, and 28 additional parking spaces will convert existing grassland. No impacts to farmland would occur.

The parcel does not currently have agriculture, nor is there a Williamson Act Contract. The proposed project would not conflict with existing zoning which is Commercial Limited. No impacts would occur.

c/d. According to the Napa County Environmental resource maps (based on the following GIS layer – Vegetation) the project site consists of urban – built-up. Improvements are not within areas that would cause a conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production, nor would it result in the loss or, or conversion of, forest land to a non-forest use in a manner that will significantly affect timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, or other public benefits. No impacts would occur.

Mitigation Measures: None required.

III.	AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
a)	Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c)	Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d)	Result in other emissions (such as those leading to odors adversely affecting a substantial number of people)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion:

On June 2, 2010, the Bay Area Air Quality Management District's (now known as the Bay Area Air Quality) Board of Directors unanimously adopted thresholds of significance to assist in the review of projects under the California Environmental Quality Act. These Thresholds are designed to establish the level at which Bay Area Air Quality believed air pollution emissions would cause significant environmental impacts under CEQA and were posted on Bay Area Air Quality's website and included in B Bay Area Air Quality's updated CEQA Guidelines (updated May 2012). The Thresholds are advisory and may be followed by local agencies at their own discretion.

The Thresholds were challenged in court. Following litigation in the trial court, the court of appeal, and the California Supreme Court, all of the Thresholds were upheld. However, in an opinion issued on December 17, 2015, the California Supreme Court held that CEQA does not generally require an analysis of the impacts of locating development in areas subject to environmental hazards unless the project would exacerbate existing environmental hazards. The Supreme Court also found that CEQA requires the analysis of exposing people to environmental hazards in specific circumstances, including the location of development near airports, schools near sources of toxic contamination, and certain exemptions for infill and workforce housing. The Supreme Court also held that public agencies remain free to conduct this analysis regardless of whether it is required by CEQA.

In view of the Supreme Court's opinion, local agencies may rely on Thresholds designed to reflect the impact of locating development near areas of toxic air contamination where such an analysis is required by CEQA or where the agency has determined that such an analysis would assist in making a decision about the project. However, the Thresholds are not mandatory and agencies should apply them only after determining that they

reflect an appropriate measure of a project's impacts. These Guidelines may inform environmental review for development projects in the Bay Area, but do not commit local governments or Bay Area Air Quality to any specific course of regulatory action.

The Air District published a new version of the Guidelines dated May 2017, which includes revisions made to address the Supreme Court's 2015 opinion in *Cal. Bldg. Indus. Ass'n vs. Bay Area Air Quality Mgmt. Dist.*, 62 Ca 4th 369.

On April 20, 2022, the Bay Area Air Quality adopted updated thresholds of significance for climate impacts: CEQA Thresholds for Evaluating the Significance of Climate Impacts, Bay Area Air Quality April 2022. The proposed thresholds to evaluate GHG and climate impacts from land use projects are qualitative, therefore there is no bright-line (quantitative) level to mitigate below. Projects that decline to integrate qualitative design elements can alternatively demonstrate consistency with a local Greenhouse Gas (GHG) Reduction Strategy that meets the criteria of the State CEQA Guidelines section 15183.5(b).

There is no proposed construction-related climate impact threshold at this time. Greenhouse gas (GHG) emissions from construction represent a very small portion of a project's lifetime GHG emissions. The proposed thresholds for land use projects are designed to address operational GHG emissions which represent the vast majority of project GHG emissions.

In short, these thresholds of significance changes can be used by agencies as guidelines for determining climate impacts from projects subject to CEQA. However, agencies are not required to abide by these thresholds, as they are only guidelines. Refer to Section VIII, Greenhouse Gas Emissions.

a/b. The mountains bordering Napa Valley block much of the prevailing northwesterly winds throughout the year. Sunshine is plentiful in Napa County, and summertime can be very warm in the valley, particularly in the northern end. Winters are usually mild, with cool temperatures overnight and mild-to-moderate temperatures during the day. Wintertime temperatures tend to be slightly cooler in the northern end of the valley. Winds are generally calm throughout the county. Annual precipitation averages range from about 24 inches in low elevations to more than 40 inches in the mountains.

Ozone and fine particle pollution, or PM2.5, are the major regional air pollutants of concern in the San Francisco Bay Area. Ozone is primarily a problem in the summer, and fine particle pollution in the winter. In Napa County, ozone rarely exceeds health standards, but PM2.5 occasionally does reach unhealthy concentrations. There are multiple reasons for PM2.5 exceedances in Napa County. First, much of the county is wind-sheltered, which tends to trap PM2.5 within the Napa Valley. Second, much of the area is well north of the moderating temperatures of San Pablo Bay and, as a result, Napa County experiences some of the coldest nights in the Bay Area. This leads to greater fireplace use and, in turn, higher PM2.5 levels. Finally, in the winter easterly winds often move fine-particle-laden air from the Central Valley to the Carquinez Strait and then into western Solano and southern Napa County (Bay Area Air Quality, *In Your Community: Napa County*, April 2016)

The impacts associated with implementation of the project were evaluated consistent with guidance provided by Bay Area Air Quality. Ambient air quality standards have been established by state and federal environmental agencies for specific air pollutants most pervasive in urban environments. These pollutants are referred to as criteria air pollutants because the standards established for them were developed to meet specific health and welfare criteria set forth in the enabling legislation. The criteria air pollutants emitted by development, traffic and other activities anticipated under the proposed development include ozone, ozone precursors oxides of nitrogen and reactive organic gases (NOx and ROG), carbon monoxide (CO), nitrogen dioxide (NO2), and suspended particulate matter (PM10 and PM2.5). Other criteria pollutants, such as lead and sulfur dioxide (SO2), would not be substantially emitted by the proposed development or traffic, and air quality standards for them are being met throughout the Bay Area.

Bay Area Air Quality has not officially recommended the use of its thresholds in CEQA analyses and CEQA ultimately allows lead agencies the discretion to determine whether a particular environmental impact would be considered significant, as evidenced by scientific or other factual data. Bay Area Air Quality also states that lead agencies need to determine appropriate air quality thresholds to use for each project they review based on substantial evidence that they include in the administrative record of the CEQA document. One resource Bay Area Air Quality provides as a reference for determining appropriate thresholds is the *California Environmental Quality Act Air Quality Guidelines* developed by its staff in 2010 and as updated through May 2017. These guidelines outline substantial evidence supporting a variety of thresholds of significance.

Table 4-1 Single Land Use Construction and Operational Criteria Air Pollutant and Precursor Screening Levels was used as the screening criteria. For the consideration of screening category, a motel, the closest land use to the proposed lodging facility, was used. Compared to the criteria of 230 rooms for "construction" emissions and 767 rooms for "operation" emissions, the project is lower than the threshold.

The closest category to a Tavern and Mercantile is fast food restaurant and/or convenience store. Given the size of the project, which is approximately 3,326 sf of floor area dedicated to food/drink service and prepacked food retail with 1,557 sf of floor area dedicated to

outdoor patios patrons to consume food and goods compared to the Bay Area Air Quality's screening criterion of 452,000 sf which is the same for both the fast food restaurant and convenience store for NOX (oxides of nitrogen), the project would contribute an insignificant amount of air pollution and would not result in a conflict or obstruction of an air quality plan. The project falls below the screening criteria as noted above, and consequently will not significantly affect air quality individually or contribute considerably to any cumulative air quality impact.

- c/d. In the short term, potential air quality impacts are most likely to result from construction activities related to the building construction. Construction emissions would have a temporary effect; consisting mainly of dust during construction activities, exhaust emissions from construction related equipment and vehicles, and relatively minor emissions from paints and other coatings. Grading will result in off-haul of soils. These potential construction impacts would be temporary in nature and subject to standard conditions of approval from the Engineering Division as part of the grading permit and/or building permit review process.

The Air District recommends incorporating feasible control measures as a means of addressing construction impacts. If the proposed project adheres to these relevant best management practices identified by the Air District and the County's standard conditions of project approval, construction-related impacts are considered less than significant:

7.1 SITE IMPROVEMENTS

c. AIR QUALITY

During all construction activities the permittee shall comply with the most current version of Bay Area Air Quality Basic Construction Best Management Practices including but not limited to the following, as applicable:

1. *Post a publicly visible sign with the telephone number and person to contact at the lead agency regarding dust complaints. The Bay Area Air Quality's phone number shall also be visible.*
2. *Water all exposed surfaces (e.g., parking areas, staging areas, soil piles, grading areas, and unpaved access roads) two times per day.*
3. *Cover all haul trucks transporting soil, sand, or other loose material off-site.*
4. *Remove all visible mud or dirt traced onto adjacent public roads by using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.*
5. *All vehicle speeds on unpaved roads shall be limited to 15 mph.*
6. *All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.*
7. *Idling times shall be minimized either by shutting off equipment when not in use or reducing the maximum idling time to five (5) minutes (as required by State Regulations). Clear signage shall be provided for construction workers at all access points.*
8. *All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified visible emissions evaluator. Any portable engines greater than 50 horsepower or associated equipment operated within the Bay Area Air Quality's jurisdiction shall have either a California Air Resources Board (ARB) registration Portable Equipment Registration Program (PERP) or a Bay Area Air Quality permit. For general information regarding the certified visible emissions evaluator or the registration program, visit the ARB FAQ http://www.arb.ca.gov/portable/perp/perpfact_04-16-15.pdf or the PERP website <http://www.arb.ca.gov/portable/portable.htm>.*

Furthermore, while earthmoving and construction on the site would generate dust particulates in the short-term, the impact would be less than significant with dust control measures as specified in Napa County's standard condition of approval relating to dust:

7.1 SITE IMPROVEMENTS

b. DUST CONTROL

Water and/or dust palliatives shall be applied in sufficient quantities during grading and other ground disturbing activities on-site to minimize the amount of dust produced. Outdoor construction activities shall not occur when average wind speeds exceed 20 mph.

While the Air District defines public exposure to offensive odors as a potentially significant impact, proposed physical improvements and operational changes to add an eight (8) room Guest Inn with five (5) new free standing guest units/cottages, Mercantile and Tavern would not significantly increase odors. Construction-phase pollutants would be reduced to a less than significant level by the above-noted standard condition of approval. The project would not create pollutant concentrations or objectionable odors affecting a substantial number of people. Impacts would be less than significant.

Mitigation Measures: None required.

IV. BIOLOGICAL RESOURCES. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

- a. The project consists of improvements to the existing asphalt concrete driveway, construction of five cottages, expansion of the septic system and related improvements on a site that is previously disturbed and developed with three structures. According to County of Napa Environmental Mapping (GIS Vegetation layer) the parcel is identified as Urban or Built up. There are no mapped special status species within the project area. There are two oak trees, and non-native landscaping, none of which are proposed to be removed. The Napa County Baseline Data Report emphasizes preservation of wildlife corridors and prevention of habitat fragmentation. According to County of Napa Environmental Mapping (GIS CNDDDB layer) there are no wildlife corridors on the parcel. No impact would occur.
- b. According to the GIS Layer – Blue-Lined Stream, Carneros Creek is located approximately 225 feet west of the project site. Carneros creek from north to south across Old Sonoma Road, where it eventually drains to the Napa River. The proposed project includes numerous retention basins as part of the project to capture and retain rainfall and prevent runoff from leaving the property. No impact would occur.
- c. According to the Napa County Environmental resource maps based on the following GIS layer – Wetlands and vernal pools and National Wetlands Inventory) there are no wetlands on the site. The project will 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. No impact would occur.
- d. According to County of Napa Environmental Mapping (GIS CNDDDB layer) there are no wildlife corridors on the parcel. No impact would occur.
- e. Chapter 18.108 of the Napa County Zoning Code (Conservation Regulations) in part, encourages the preservation of natural resources

through project design that minimizes grading operations (cut, fill, earthmoving) and other such man-made effects in the natural terrain, preserves natural habitat, minimizes impacts on existing land forms, avoids steep slopes, and preserves existing vegetation. No trees are proposed to be removed. No impact would occur.

- f. The proposed project would not conflict with the provisions of an adopted Habitat Conservation Plans, Natural Community Conservation Plans or other approved local, regional or state habitat conservation plans because there are no plans applicable to the subject site. No impacts would occur.

Mitigation Measures: None required.

V.	CULTURAL RESOURCES. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
a)	Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c)	Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

- a/b. Archeological Resource Services prepared an archeological resource management report, dated May 31, 2023. The survey included the entire 2.35 acre parcel with review of prior historical reports. There were no archeological resources found. There are two structures on the property that based on age could qualify as historic; however, given the extensive renovations to the structures, it seems unlikely to qualify to be a registered historic. The project proposes ground disturbance and construction. If resources are found during any earth disturbing activities associated with the project, construction of the project is required to cease, and a qualified archaeologist would be retained to investigate the site in accordance with the following standard condition of approval. Impacts are anticipated to be less than significant.

7.2 ARCHEOLOGICAL FINDING

In the event that archeological artifacts or human remains are discovered during construction, work shall cease in a 50-foot radius surrounding the area of discovery. The permittee shall contact the PBES Department for further guidance, which will likely include the requirement for the permittee to hire a qualified professional to analyze the artifacts encountered and to determine if additional measures are required.

If human remains are encountered during project development, all work in the vicinity must be halted, and the Napa County Coroner informed, so that the Coroner can determine if an investigation of the cause of death is required, and if the remains are of Native American origin. If the remains are of Native American origin, the permittee shall comply with the requirements of Public Resources Code Section 5097.98.

- c. No human remains have been previously encountered on the property, no information has been encountered that would indicate that this project would encounter human remains. If human remains are encountered during project development, construction of the project is required to cease, and the requirements of Condition of Approval 7.2, listed above, would apply. No impacts would occur.

Mitigation Measures: None required.

VI.	ENERGY. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
	a) Result in potentially significant environmental impact due to wasteful, inefficient or unnecessary consumption of energy resources during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

- a. The proposed project would comply with Title 24 energy use requirements for the proposed alterations and new building development. In complying with these requirements, the project would not result in significant environmental impacts due to wasteful, inefficient or unnecessary consumption of energy resources during project construction or operation. The project will consider upgrading to energy efficient fixtures and appliances where feasible and consider future upgrades to further offset unnecessary consumption of energy resources.
- b. The proposed project would not conflict with the provisions of a state or local plan for renewable energy or energy efficiency because there are no plans applicable to the subject site. No impacts would occur.

Mitigation Measures: None required.

VII.	GEOLOGY AND SOILS. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
	a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
	i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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| d) Be located on expansive soil creating substantial direct or indirect risks to life or property? Expansive soil is defined as soil having an expansive index greater than 20, as determined in accordance with ASTM (American Society of Testing and Materials) D 4829. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Discussion:

a.

- i.) There are no known faults that run beneath the project site on the most recent Alquist-Priolo Earthquake Fault Zoning Map. The site is approximately 1 mile east of the boundary of the West Napa Fault. As such, the proposed project would result in a less than significant impact with regards to rupturing of a known fault. Impacts would be less than significant.
- ii.) All areas of the Bay Area are subject to strong seismic ground shaking. Code and standards related to the construction of the new building and cave would reduce the potential impacts to a less than significant level in relation to seismic ground shaking.
- iii.) According to Napa County Environmental Resource maps (based on the following GIS layer – Liquefaction) the entire parcel is designated in an area with a Very Low susceptibility for liquefaction. No subsurface conditions have been identified on the project site that indicated a susceptibility to seismic-related ground failure or liquefaction. The Guest Inn cottages and restroom/storage structure will be constructed in compliance with the latest edition of the California Building Code for seismic stability. Impacts would be less than significant.
- iv.) According to the Napa County Environmental Resource Maps (Landslides line, polygon, and geology layers) there is no evidence of landslides on the property. Construction is primarily in already developed areas. Impacts are expected to be less than significant.

b. Building construction associated with the project would primarily take place in an existing grassed area adjacent to the residence. The proposed Guest Inn five (5) stand-alone units, bathroom/storage building, driveway improvement and pervious parking areas would require grading. The project does not propose the removal or import of soil for construction. The total ground disturbing activities are limited, and impacts would be less than significant. Soil erosion and resulting water quality would be maintained through the installation of bioretention basins as well as standard stormwater quality treatment control measures and compliance with the Engineering Division Conditions of Approval.

c/d. According to the Napa County Environmental Resource Maps (based on the following layers - Geology, Surficial deposits, Soil Types, Geologic Units), the soils on the entire parcel, including the building pad area, are Surficial deposits (Quaternary) - Alluvial (late and early Pleistocene fan and terrace deposits). The project site is in an area with a Very Low susceptibility for liquefaction. Building construction would primarily occur within previously disturbed areas. The proposed cottages will be constructed on the east side of the residence where the existing septic system and leach field area located. The new buildings will be constructed in compliance with the latest edition of the California Building Code. The project is not proposed on an unstable geologic unit or soil that would become unstable or would create direct or indirect risks to life or property. Impacts are expected to be less than significant.

e. The project would not violate any water quality standards or waste discharge requirements. A Wastewater Feasibility Study was prepared by Nor Cal Civil Engineering, Inc., dated February 26, 2024. Site evaluation results indicate and recommend the design and installation of a subsurface drip irrigation septic system. The waste system will include a pretreatment system that will include a commercial textile filter, septic tank, and recirculation tank. The subsurface drip system is comprised of two areas totaling 9,341 sf, the primary drip area is 3,097 sf, and the reserve area will be 6,194 sf. The Division of Environmental Health reviewed this report and concurred with its findings, conditioning that the plans shall be designed by a licensed Civil Engineer or Registered Environmental Health Specialist and approved by the Division of Environmental Health, subject to conditions of approval. Ongoing water quality monitoring will be required. Impacts would be less than significant.

f. No paleontological resources or unique geological features have been identified on the property in the project area or were encountered on the property when prior renovations and work was performed on the property. The project as proposed would require minimal earth disturbing activities and construction is unlikely to uncover paleontological or unique geological features. Impacts would be less than significant.

Mitigation Measures: None required.

VIII.	GREENHOUSE GAS EMISSIONS. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
a)	Generate a net increase in greenhouse gas emissions in excess of applicable thresholds adopted by the Bay Area Air Quality Management District or the California Air Resources Board which may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Conflict with a county-adopted climate action plan or another applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion:

On April 20, 2022, the Bay Area Air Quality adopted updated thresholds of significance for climate impacts (CEQA Thresholds for Evaluating the Significance of Climate Impacts, Bay Area Air Quality April 2022).² The updated thresholds to evaluate GHG and climate impacts from land use projects are qualitative and geared toward building and transportation projects. Per the Bay Area Air Quality, all other projects should be analyzed against either an adopted local Greenhouse Gas Reduction Strategy (i.e., Climate Action Plan (CAP)) or other threshold determined on a case-by-case basis by the Lead Agency. If a project is consistent with the State's long-term climate goals of being carbon neutral by 2045, then a project would have a less-than-significant impact as endorsed by the California Supreme Court in *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 62 Cal. 4th 204. There is no proposed construction-related climate impact threshold at this time. Greenhouse gas (GHG) emissions from construction represent a very small portion of a project's lifetime GHG emissions. The proposed thresholds for land use projects are designed to address operational GHG emissions which represent the vast majority of project GHG emissions.

Napa County has been working to develop a Climate Action Plan (CAP) for several years. In 2012, a Draft CAP (March 2012) was recommended using the emissions checklist in the Draft CAP, on a trial basis, to determine potential greenhouse gas (GHG) emissions associated with project development and operation. At the December 11, 2012, Napa County Board of Supervisors (BOS) hearing, the BOS considered adoption of the proposed CAP. In addition to reducing Napa County's GHG emissions, the proposed plan was intended to address compliance with CEQA for projects reviewed by the County and to lay the foundation for development of a local offset program. While the BOS acknowledged the plan's objectives, the BOS requested that the CAP be revised to better address transportation-related greenhouse gas, to acknowledge and credit past accomplishments and voluntary efforts, and to allow more time for establishment of a cost-effective local offset program. The BOS also requested that best management practices be applied and considered when reviewing projects until a revised CAP is adopted to ensure that projects address the County's policy goal related to reducing GHG emissions. In addition, the BOS recommended utilizing the emissions checklist and associated carbon stock and sequestration factors in the Draft CAP to assess and disclose potential GHG emissions associated with project development and operation pursuant to CEQA.

In July 2015, the County re-commenced preparation of the CAP to: i) account for present day conditions and modeling assumptions (such as but not limited to methods, emission factors, and data sources), ii) address the concerns with the previous CAP effort as outlined above, iii) meet applicable State requirements, and iv) result in a functional and legally defensible CAP. On April 13, 2016, the County, as the part of the first phase of development and preparation of the CAP, released Final Technical Memorandum #1: 2014 Greenhouse Gas Emissions Inventory and Forecast, April 13, 2016. This initial phase included: i) updating the unincorporated County's community-wide GHG emissions inventory to 2014, and ii) preparing new GHG emissions forecasts for the 2020, 2030, and 2050 horizons. On July 24, 2018, the County prepared a Notice of Preparation of a Draft Focused EIR for the Climate Action Plan. The review period was from July 24, 2018, through August 22, 2018. The Draft Focused EIR for the CAP was published May 9, 2019. Additional information on the County CAP can be obtained at the Napa County Department of Planning, Building and Environmental Services or online at <https://www.countyofnapa.org/589/Planning-Building-Environmental-Services>. The County's draft CAP was placed on hold, when the Climate Action Committee (CAC) began meeting on regional GHG reduction strategies in 2019. The County is currently preparing an updated CAP to provide a clear framework to determine what land use actions will be necessary to meet the State's adopted GHG reduction goals, including a quantitative and measurable strategy for achieving net zero emissions by 2045.

For the purposes of this assessment the carbon stock and sequestration factors identified within the 2012 Draft CAP are utilized to calculate and

² <https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines>, April 2022

disclose potential GHG emissions associated with agricultural “construction” and development and with “ongoing” agricultural maintenance and operation, as further described below. The 2012 Draft CAP carbon stock and sequestration factors are utilized in this assessment because they provide the most generous estimate of potential emissions. As such, the County considers that the anticipated potential emissions resulting from the proposed project that are disclosed in this Initial Study reasonably reflect proposed conditions and therefore are considered appropriate and adequate for project impact assessment.

Regarding operational emissions, as part of the statewide implementation of Senate Bill (SB) 743, the Governor’s Office of Planning and Research (OPR) settled upon automobile vehicle miles of travel (VMT) as the preferred metric for assessing passenger vehicle-related impacts under CEQA and issued revised CEQA Guidelines in December 2018, along with a Technical Advisory on Evaluating Transportation Impacts in CEQA to assist practitioners in implementing the CEQA Guidelines revisions. The CEQA Guidelines and the OPR Technical Advisory concluded that, absent substantial evidence otherwise, the addition of 110 or fewer daily trips could be presumed to have a less than significant VMT impact.

The County maintains a set of Transportation Impact Study Guidelines (TIS Guidelines) that define situations and project characteristics that trigger the need to prepare a TIS. The purpose of a TIS is to identify whether the project is likely to cause adverse physical or operational changes on a County roadway, bridge, bikeway or other transportation facility, to determine whether the project should be required to implement or contribute to improvement measures to address those changes, and to ensure that the project is developed consistent with the County’s transportation plans and policies. Per the County’s current TIS Guidelines, a project is required to prepare a TIS if it generates 110 or more net new daily vehicle trips.

The TIS Guidelines also include VMT analysis requirements for projects based on trip generation, which includes a screening approach that provides a structure to determine what level of VMT analysis may be required for a given project. For a new project that would generate less than 110 net new daily vehicle and truck trips, not only is the project not required to prepare a TIS, it is also presumed to have a less-than-significant impact for VMT. However, applicants are encouraged to describe the measures they are taking and/or plan to take that would reduce the project’s trip generation and/or VMT. Projects that generate more than 110 net new passenger vehicle trips must conduct a VMT analysis and identify feasible strategies to reduce the project’s vehicular travel; if the feasible strategies would not reduce the project’s VMT by at least 15%, the conclusion would be that the project would cause a significant environmental impact.

- a-b. Overall increases in Greenhouse Gas (GHG) emissions in Napa County were assessed in the Environmental Impact Report (EIR) prepared for the Napa County General Plan Update and certified in June 2008. GHG emissions were found to be significant and unavoidable in that document, despite the adoption of mitigation measures incorporating specific policies and action items into the General Plan. Note: Pursuant to State CEQA Guidelines Section 15183, because this initial study assesses a project that is consistent with an adopted General Plan for which an environmental impact report (EIR) was prepared, it appropriately focuses on impacts which are “peculiar to the project,” rather than the cumulative impacts previously assessed.

Consistent with the General Plan action items, Napa County participated in the development of a community-wide GHG emissions inventory and “emission reduction framework” for all local jurisdictions in the County in 2008-2009. This planning effort was completed by the Napa County Transportation and Planning Agency in December 2009, and served as the basis for development of a refined inventory and emission reduction plan for unincorporated Napa County. During our ongoing planning effort, the County requires project applicants to consider methods to reduce GHG emissions consistent with Napa County General Plan Policy CON-65(e). For the purposes of this analysis potential GHG emissions associated with ‘construction’ and ‘development’ and with ‘ongoing’ operations have been discussed.

Greenhouse gas (GHG) emissions from construction represent a very small portion of a project’s lifetime GHG emissions. The Bay Area Air Quality recommended thresholds do not include a construction-related climate impact threshold at this time. One time “Construction Emissions” associated with the project include: emissions associated with the energy used to develop and prepare the project area, construction, and construction equipment, and worker vehicle trips (hereinafter referred to as Equipment Emissions). As discussed in Section III. Air Quality, the applicant provided an Air Quality and GHG Emissions Assessment prepared by Illingworth & Rodkin, Inc. dated July 11, 2022 – Revised October 6, 2022, which noted that construction emissions would have a temporary effect and Bay Area Air Quality recommends incorporating feasible control measures as a means of addressing construction impacts. If the proposed project adheres to relevant best management practices identified by the Bay Area Air Quality and the County’s standard conditions of project approval, construction-related impacts are considered less than significant. See Section III. Air Quality for additional information.

The Bay Area Air Quality proposed thresholds for land use projects are designed to address “Operational” GHG emissions which represent the vast majority of project GHG emissions. Operational emissions associated with similar projects generally include: i) any reduction in the amount of carbon sequestered by existing vegetation that is removed as part of the project compared to a “no project” scenario (hereinafter referred to as Operational Sequestration Emissions); and ii) ongoing emissions from the energy used to maintain and operate the proposed uses, including vehicle trips associated with employee and visitor trips (hereinafter referred to as Operational Emissions).

As noted above, Napa County has not adopted a qualified GHG reduction strategy or an air quality plan, therefore projects will be

evaluated per the Bay Area Air Quality recommended minimum design elements.

Specifically for buildings, the project must not:

- Include natural gas appliances or natural gas plumbing (in both residential and nonresidential development); and
- Result in any wasteful, inefficient, or unnecessary electrical usage as determined by the analysis required under CEQA section 21100(b)(3) and CEQA Guidelines section 15126.2(b).

The project will be required, through conditions of project approval, to prohibit the use of natural gas appliances or plumbing. Additionally, at the time of construction the project will be required to comply with the California Building Code, which is currently being updated to include regulations to assist in the reduction of air quality impacts associated with construction, such as prohibiting natural gas appliance and plumbing. The new construction will be required to install energy efficient fixtures complying with CA building code Title 24 standards. See section VI. Energy for additional information on energy usage.

Specifically for transportation, the project must:

- Achieve compliance with electric vehicle requirements in the most recently adopted version of CALGreen Tier 2, and
- Achieve a reduction in project-generated vehicle miles traveled (VMT) below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted Senate Bill 743 VMT target reflecting the following recommendations:
 - Residential projects: 15 percent below the existing VMT per capita;
 - Office projects: 15 percent below the existing VMT per employee; or
 - Retail projects: no net increase in existing VMT.

The project will be required to comply with the recently adopted version of CALGreen Tier 2. Project approval will also include a condition of approval to ensure this is reviewed and implemented at the time of construction through adherence to the California Building Code.

As discussed above and in section XVII. Transportation, the County maintains a TIS Guidelines that include VMT analysis requirements for projects based on trip generation. The project trip generation numbers required completion of a traffic study and VMT analysis. The project TIS, prepared by W-Trans, dated April 30, 2024, includes recommendation for a Traffic Demand Management (TDM) Plan for reducing vehicle miles traveled. See section XVII. Transportation for additional detail.

New development resulting from this project will utilize energy conserving lighting and water efficient fixtures. A condition of approval will be included to require implementation of the checked Voluntary Best Management Practices Measures submitted with the project application. These include the following: bioswales, meeting or exceeding CALGreen Tier 1 and 2.

If the proposed project adheres to these relevant design standards identified by Bay Area Air Quality, the requirements of the California Building code, and the County's conditions of project approval, impacts are considered less than significant.

Mitigation Measures: None required.

IX.	HAZARDS AND HAZARDOUS MATERIALS. Would the project	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Create a significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wild-land fires? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Discussion:

- a. The proposed project would not involve the transport of hazardous materials other than those small amounts utilized in typical tavern operations, retail and lodging. Impacts would be less than significant.
- b. Hazardous materials such as diesel and maintenance fluids would potentially be used onsite during construction. Should they be stored onsite, these materials would be stored in secure locations to reduce the potential for upset or accident conditions. The proposed project consists of a request to change the use of three existing structures on the subject property, including (a) converting an existing three (3) bedroom residence into an eight (8) room Guest Inn (b) converting the existing bike rental/guided tour and luxury tour car staging business to a Tavern that will serve food, (c) converting the existing furniture store with art, antique, and retail products to a Mercantile store with wine tastings; (d) adding a concession trailer for the sale of coffee and pre-package morning snacks; and (e) constructing five (5) stand-alone guest units as part of the Guest Inn; (f) constructing a structure with restrooms and storage that would not be expected to use any substantial quantities of hazardous materials. The proposed operational changes are not anticipated to significantly increase the quantities. Therefore, it would not be reasonably foreseeable for the proposed project to create upset or accident conditions that involve the release of hazardous materials into the environments. Impacts would be less than significant.
- c. There are no schools located within one-quarter mile from the project site. The nearest school is within the City of Napa, over two and half northeast of the project site. No impacts would occur.
- d. Based on a search of the California Department of Toxic Substances Control database, the project site had a former gas station which was on the Leaking Underground Storage Tank (LUST) list. The property was cleaned with a closed cased. Given that the LUST case has been closed, no impact would occur as the project site is no longer active on any known list of hazardous materials sites.
- e. No impact would occur as the project site is not located within an airport land use plan.
- f. The Napa County Emergency Operations Plan (EOP) outlines procedures, including establishing leadership roles and responsibilities of various agency staff, that guide local preparedness, response, recovery and resource management efforts associated with occurrence of a natural disaster, significant emergency, or other threat to public safety. The project would not result in closure or permanent obstruction of adjacent public rights-of-way. No component of the implementation of the EOP would otherwise be impaired by the proposed modifications to the use permit. The existing driveway meets County standards with four points of access, two from Old Sonoma Road and two from Old Sonoma Hwy. There are minor changes to the internal driveway to proposed parking. The proposed development would not obstruct an emergency response or evacuation plan. Impacts would be less than significant.
- g. According to the Napa County Environmental resource maps (based on the following GIS layer – Fire Hazard Severity Zones) the property is not located within a designated fire risk zone. There are no impacts.

Mitigation Measures: None required.

X. HYDROLOGY AND WATER QUALITY. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 which would:				
i) result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

The County requires all discretionary permit applications (such as use permits and ECPAs) to complete necessary water analyses in order to document that sufficient water supplies are available for the proposed project and to implement water saving measures to prepare for periods of limited water supply and to conserve limited groundwater resources.

On June 7, 2022, the Napa County Board of Supervisors provided interim procedures to implement provisions of the Napa County Groundwater Sustainability Plan (GSP) for issuance of new, altered or replacement well permits and discretionary projects that would increase groundwater use. The direction limits a parcel's groundwater allocation to 0.3-acre feet per acre per year, or no net increase in groundwater use if that threshold is exceeded already for parcels located in the GSA Subbasin. For parcels not located in the GSA Subbasin (i.e., generally located in the hillsides), a parcel-specific Water Availability Analysis would suffice to assess potential impacts on groundwater supplies. Because the parcel is not located in the GSA subbasin, it is subject to a parcel specific Water Availability Analysis.

To assess potential impacts resulting from project well(s) interference with neighboring wells within 500 feet and/or springs within 1,500 feet, the County's WAA guidance² requires applicants to perform a Tier 2 analysis where the proposed project would result in an increase in groundwater extraction from project well(s) compared to existing levels.

To assess the potential impacts of groundwater pumping on hydrologically connected navigable waterways and those non-navigable tributaries connected to navigable waters, the County's WAA guidance requires applicants to perform a Tier 3 or equivalent analysis for new or replacement wells, or discretionary projects that would rely on groundwater from existing or proposed wells that are located within 1,500 feet of designated "Significant Streams."

Public Trust: The public trust doctrine requires the state and its legal subdivisions to "consider," give "due regard," and "take the public trust into account" when considering actions that may adversely affect a navigable waterway. (*Environmental Law Foundation v. State Water Resources Control Bd.*; *San Francisco Baykeeper, Inc. v. State Lands Com.*) There is no "procedural matrix" governing how an agency should consider public trust uses. (*Citizens for East Shore Parks v. State Lands Com.*) Rather, the level of analysis "begins and ends with whether the challenged activity harms a navigable waterway and thereby violates the public trust." (*Environmental Law Foundation*, 26 Cal.App.5th at p. 403.). As demonstrated in the *Environmental Law Foundation vs State Water Resources Control Board Third District Appellate Court Case*, that arose in the context of a lawsuit over Siskiyou County's obligation in administering groundwater well permits and management program with respect to Scott River, a navigable waterway (considered a public trust resource), the court affirmed that the public trust doctrine is relevant to extractions of groundwater that adversely impact a navigable waterway and that Counties are obligated to consider the doctrine, irrespective of the enactment of the Sustainable Groundwater Management Act (SGMA). As disclosed and assessed in this ND and the WAA, the County concludes that no harm to (or less-than-significant impacts on) public trust resources would result from the proposed project. As designed and with the above-described COAs impacts to water quality and groundwater supplies will be less than significant.

On January 10, 2024, Napa County released the Interim Napa County Well Permit Standards and WAA Requirements - January 2024, providing guidance to complying with the Public Trust.

a/b. Tier 1: A Tier I Water Availability Analysis (WAA) (Attachment I), dated June 17, 2024 was prepared by EBA Engineering, to determine the estimated water use of the existing development, the proposed project demand and groundwater availability.

Because the project parcel is located outside of the GSA Subbasin, it is subject to a Tier 1 parcel specific recharge based on the parcel size of 2.35 acres.

The water source for the existing property is d from one (1) existing onsite well. The well serves the existing residence, along with the Art Gallery, bike rental/guided tour business and luxury car excursion. According to the WAA, the well is capable of producing a flow rate in excess of 30 gallons per minute (gpm). The well is proposed to serve the new Mercantile, Tavern, coffee car, and Guest Inn.

EBA Engineering performed a water budget that considered precipitation, septic flow returns, and runoff. The estimated volume of water available for groundwater recharge is 3.62-acre feet per year (AF/Y) during an average precipitation year. Estimated groundwater demand for the proposed project would be 2,410 gallons per day (GPD) or 2.70 AF/Y, approximately 75% of the water available for recharge. The estimated groundwater demand was conservatively based on operations over the course of 365 days; however, the project proposes operation of the Mercantile, Tavern and Coffee Cart only 50 weeks per year or 350 days of the year, with the exception of the Mercantile open only five days per week for a total of 250 days of the year.

The WAA estimated the projected overall water demand for the project to be 2.70 af/yr, representing a 1.80 af/yr increase of the existing water demand of 0.896 af/yr based on approved usage under Use Permit Modification P14-00022-MOD.

The parcel water demand can be met with the existing project well. Therefore, the impacts from the project would be less than

significant and no further analysis is needed. Below is a table that details each source of existing and proposed groundwater use:

Usage Type	Estimated Usage – AF/YR
Existing Water Demand	
Residence	0.5040
Landscaping	0.3024
Furniture Store and Art Gallery	0.0896
Bike Rental and Guided Tour Business	
Luxury Car Excursion	
Total Existing Water Demand	0.896^a AF/YR
Proposed Water Demand	
Mercantile	0.218
Tavern	1.176
Coffee Cart	0.043
Guest Inn	0.823
Mercantile Small Events (3 per years)	0.0014
Total Proposed Water Demand w/o Large events	2.26 AF/YR
Proposed Water Demand on Large Event days^b	
Guest Inn	0.823
Large Events (4 times per month)	0.141
Coffee Cart	0.43
Total Proposed Water Demand w/ Large Events	1.39 AF/YR
Landscaping	0.27
Total Annual Water Demand based on highest daily use	2.70 AF/YR

Disclaimer: Conversions on a use-by-use basis has a margin of error. The cumulative anticipated water demand of 2410 gallons per day equates to 2.70 AF/Yr, which is consistent with the Water Availability Analysis, prepared by EBA Engineers.

Table Notes:

- a. Total existing water demand is based on uses approved by Use Permit Modification P14-00022-MOD
- b. Day with large events scheduled, the Mercantile and will be closed per the Wastewater Feasibility Study.

The project, if approved, would include the County's standard Condition of Approval 4.1, below, requiring collection of well data for the on-site well, as well as the potential to modify/alter permitted uses on site should groundwater resources become insufficient to supply the use.

Tier 2: The nearest off-site neighboring well is located approximately 150 feet to the north, less than 500 feet from the proposed project well. The proximity and proposed increase in groundwater demand required a Tier 2 well interference analysis. The daily water demand of 2,410 GPD would require a pumping rate duration to pump 30 gallons of water per minute over the course of 80 minutes. To determine if the increased groundwater demand could have the potential to interfere with offsite neighboring wells, EBA Engineering first determined that the onsite well has the capacity to supply the necessary water for the proposed project at a pumping rate of 30 gallons per minute (GPM), and modeling based on the 80 minute pump duration, values predicted there would be ten (10) feet of drawdown at a distance of 24 feet, with less than one (1) foot of drawdown at 48 feet from the project well. The modeling predicts that there would be no impact to the offsite neighboring well that is located 150 feet away.

Tier 3: A formal Tier 3 analysis was required, because the project well is located within 1,500 feet of Carneros Creek which is a County designated Significant Stream. Public Trust Doctrine requires the County to consider and give due regard to public trust when analyzing impacts that may impact a navigable waterway, or a non-navigable course (in this instance Carneros Creek) which connects to a navigable waterway (Napa River).

Carneros Creek is located approximately 435 feet to the west of the well. Using similar coefficients to the streamflow depletion modeling to that used for the well interference analysis, EBA's hydrogeologist opined that there would be no measurable stream depletion (0.0000 cubic feet per second). Given the lack of modeled streamflow depletion in Carneros Creek, it is EBA's opinion that pumping from the existing onsite well would not contribute to significant and unreasonable stream depletion in Carneros Creek. Therefore, the proposed increase in groundwater pumping if the project is approved, would not significantly contribute to stream depletion from Carneros Creek.

Although the project is not anticipated deplete streamflows from Carneros Creek, a standard well monitoring condition COA No. 4.11, shall be implemented to require the following: that groundwater well shall be monitored including static water levels no less than quarterly (four times per year) and the volume of water collected monthly. As conditioned the County has satisfied its duty to consider impacts to trust resources and no further analysis is required.

4.1 GROUND WATER MANAGEMENT – WELLS

This condition is implemented by the Planning, Building and Environmental Services (PBES) Department:

The permittee shall be required (at the permittee's expense) to record well monitoring data (specifically, static water level no less than quarterly, and the volume of water withdrawn no less than monthly). Such data will be provided to the County, if the Director of Planning, Building, and Environmental Services (PBES Director) determines that substantial evidence³ indicates that water usage at the project is affecting, or would potentially affect, groundwater supplies or nearby wells. If data indicates the need for additional monitoring, and if the applicant is unable to secure monitoring access to neighboring wells, onsite monitoring wells may need to be established to gauge potential impacts on the groundwater resource utilized for the project. Water usage shall be minimized by use of best available control technology and best water management conservation practices.

In order to support the County's groundwater monitoring program, well monitoring data as discussed above will be provided to the County if the Director PBES determines that such data could be useful in supporting the County's groundwater monitoring program. The project well will be made available for inclusion in the groundwater monitoring network if the Director of PBES determines that the well could be useful in supporting the program.

In the event that changed circumstances or significant new information provide substantial evidence¹ that the groundwater system referenced in this use permit would significantly affect the groundwater basin, the PBES Director shall be authorized to recommend additional reasonable conditions on the permittee, or revocation of this permit, as necessary to meet the requirements of the County Code and to protect public health, safety, and welfare.

The project would not violate any water quality standards or waste discharge requirements nor substantially deplete local groundwater supplies. According to the Wastewater Feasibility Report prepared by NorCal Civil Engineering, Inc., dated February 2, 2023, the project site and proposed system upgrade would have adequate disposal capacity to serve the project. The Division of Environmental Health reviewed this report and concurred with its findings.

- c. The project would not substantially alter the drainage pattern on site or cause a significant increase in erosion or siltation on or off the project site. Improvement plans prepared prior to the issuance of a building permit would ensure that the proposed project does not increase runoff flow rate or volume as a result of project implementation. General Plan Policy CON-50 c) requires discretionary projects, including this project, to meet performance standards designed to ensure peak runoff in 2-, 10-, 50-, and 100-year events following development is not greater than predevelopment conditions. The proposed project has been evaluated by the Engineering Division with standard conditions of approval including implementation of standard stormwater quality treatment controls to treat runoff prior to discharge from the project site demonstrated as part of the building application that will include grading designs. The incorporation of standard features into the project would ensure that the proposed project would not create substantial sources of

¹. Substantial evidence is defined by case law as evidence that is of ponderable legal significance, reasonable in nature, credible and of solid value. The following constitute substantial evidence: facts, reasonable assumptions predicated on facts; and expert opinions supported by facts. Argument, speculation, unsubstantiated opinion or narrative, or clearly inaccurate or erroneous information do not constitute substantial evidence.

polluted runoff. In addition, the proposed project does not have any unusual characteristics that create sources of pollution that would degrade water quality. Impacts would be less than significant.

- d. The parcel is located within the Zone X flood boundary (500 year), considered an area of minimal flood hazard. The parcel is not located in an area that is subject to inundation by tsunamis, seiches, or mudflows. No impacts would occur.
- e. The proposed project would not conflict with a water quality control plan or sustainable groundwater management plan. No impacts would occur.

Mitigation Measures: None required.

XI.	LAND USE AND PLANNING. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
	a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

- a. The project would be located on private property in Napa County. Because the project would include improvements to existing structures and within area previously disturbed, and situated adjacent to existing residences, vineyard, storage yard, and approximately 1,000 feet west of the Carneros Inn resort with restaurants, the project would not divide an established community. Therefore, there would be no impact.
- b. The subject parcel is located in the CL (Commercial Limited) zoning district, which occurs on land with an Agricultural, Watershed and Open Space (AWOS) General Plan Designation. State law requires zoning to be consistent with the General plan. To address the potential conflict to long existing commercially zoned property within the AWOS (and AR – Agricultural Resource) designated areas, the 2008 General Plan (and the prior 1983 General Plan) contains Agricultural and Land Use Element Policy AG/LU-45 which states that such commercially zoned properties are consistent with the AWOS designations as a result of their legal establishment of the 1975 County General Plan Land Use Element, and as such are permitted to continue to operate including establishment of additional commercial uses and mixed residential-commercial uses but only on those portions of the property that have commercial zoning. This proposal is fully consistent with Policy AG/LU-45. The proposed expansion in use, consisting of the conversion of the two commercial structures to a Tavern, Mercantile and conversion of the single-family residence to an eight (8) bedroom Guest Inn with five (5) stand-alone guest units/cottages, in addition to a Coffee Cart. The entire parcel contains commercial zoning, so there is no issue of commercial support facilities spilling out onto agriculturally zoned lands, such as a septic system or parking. All components of the development serving the commercial use are contained within the commercially zoned property. The proposed uses are also consistent with the CL-Commercial Limited zoning district provides for tourist and local serving retail and service uses. The proposed uses are consistent with General Plan Policy AG-LU-45 and therefore, there would be no impact. There are no applicable habitat conservation plans or natural community conservation plans applicable to the property.

Mitigation Measures: None required.

XII.	MINERAL RESOURCES. Would the project:	Potentially Significant	Less Than Significant With	Less Than Significant	No Impact

	Impact	Mitigation Incorporation	Impact	
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

- a./b. Historically, the two most valuable mineral commodities in Napa County in economic terms have been mercury and mineral water. More recently, building stone and aggregate have become economically valuable. Mines and Mineral Deposits mapping included in the Napa County Baseline Data Report (Mines and Mineral Deposits, BDR Figure 2-2) indicates that there are no known mineral resources nor any locally important mineral resource recovery sites located on the project site. No impacts would occur.

Mitigation Measures: None required.

XIII.	NOISE. Would the project result in:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
a)	Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

The parcel is bordered on the north by Old Sonoma Road and on the west by Old Sonoma Highway. Both roads contribute to a high ambient noise level. The closest offsite residence is located on the parcel that borders the project site to the south. The residence is located approximately 260 feet from the existing art gallery building and approximately 140 feet from the Guest Inn. The residence is situated at about the same elevation as the subject property. Additionally, there is a row of mature trees along the property line and fence between the property line and the neighboring residence. No tree removal is included in this project.

- a/b. Impacts due to a temporary increase in ambient noise generated from construction activities, or from groundborne vibration, would remain below a level of significance through compliance with the Napa County Noise Ordinance (Napa County Code Chapter 8.16). The County Noise Ordinance limits construction activities to daylight hours (7:00 a.m. to 7:00 p.m.) using properly muffled vehicles. In addition to the County Noise Ordinance, the project applicant will be required to comply with project Conditions of Approval (outlined below) related to construction noise, which will limit activities further by requiring construction vehicles to be muffled and backup alarms adjusted to the lowest allowable levels. Impacts would be less than significant.

7.3. CONSTRUCTION NOISE

Construction noise shall be minimized to the greatest extent practical and feasible under State and local safety laws, consistent with construction noise levels permitted by the General Plan Community Character Element and the County Noise Ordinance. Construction equipment muffling and hours of operation shall be in compliance with the County Code. Equipment shall be shut down when not in use. Construction equipment shall normally be staged, loaded, and unloaded on the project site, if at all practicable. If project terrain or access road conditions require construction equipment to be staged, loaded, or unloaded off the project site (such as on a neighboring road or at the base of a hill), such activities shall only occur daily between the hours of 8 am to 5 pm.

Additional regulations contained within County Code Chapter 8.16 establish exterior noise criteria for various land uses in the County. As described in the Project Setting, above, land uses in the area are rural residential properties, wineries, and vineyards and a farm management business; of these land uses, residential land uses are considered the most sensitive to noise. Based on the standards in County Code section 8.16.070, noise levels, measured at the exterior of a residential structure or residential use on a portion of a larger property, may not exceed 50 decibels for more than half of any hour in the window of daytime hours (7:00 a.m. to 10:00 p.m.), the timeframe within which the proposed uses will have customers and marketing events. Noise impacts of the proposed project would be considered bothersome and potentially significant if sound generated by it had the effect of exceeding the standards in County Code more than 50 percent of the time (i.e., more than 50 decibels for more than 30 minutes in an hour for a residential use).

Noise from operations is generally limited and intermittent, meaning the sound level can vary during the day and over the course of the year, depending on the activities at the project site. The primary noise-generating activities will be outdoor areas of the Tavern and Mercantile where people will gather or be seated. According to Table 4.7-1 of the Napa County General Plan EIR, typical noise generated from normal conversations is 60dBA at a distance of 5-10 feet. Furthermore, the Napa County General Plan EIR indicates the average, or equivalent, sound level (Leq) for Hotel/Motel/Sleeping, Restaurant, and Market/Retail Sales activities are between 50 and 65 dBA. The nearest residence is located over 200 feet from the Tavern and Mercantile.

Audibility of a new noise source and/or increase in noise levels within recognized acceptable limits are not usually considered to be significant noise impacts, but these concerns should be addressed and considered in the planning and environmental review processes. The hours of operation would occur between 5:30 am and 7:00 pm with Coffee Cart opening at 5:30 am, whereas the Mercantile and Tavern would open after 10:00 am. The potential for the creation of significant noise from visitation is significantly reduced, with both indoor and outdoor spaces for guests to occupy and outdoor area enclosed attenuating noise. The Tavern proposes 80 seats, of which 32 will be located inside and 48 outside. The outdoor space of the Mercantile will be enclosed to further muffle noise. Furthermore, the project site is located 600 feet north of Carneros Highway (State Route 121/12) which produced background levels of noise of 63 dBA. Finally, outdoor equipment would be subject to the following standard conditions requiring that any exterior equipment be enclosed or muffled and maintained so as not to create a noise disturbance.

4.9 GENERAL PROPERTY MAINTENANCE – LIGHTING, LANDSCAPING, PAINTING, MECHANICAL EQUIPMENT, TRASH ENCLOSURE AREAS

- a. *All lighting shall be permanently maintained in accordance with the lighting and building plans approved by the County.*
- b. *All landscaping shall be permanently maintained in accordance with the landscaping approved by the County.*
- c. *All outdoor screening, storage, mechanical equipment and utility structures shall be permanently maintained in accordance with the landscaping and building plans approved by the County. No stored items shall exceed the height of the screening. Exterior equipment shall be maintained so as to not create a noise disturbance or exceed noise thresholds in the County Code.*
- d. *The colors used for the roof, exterior walls and built landscaping features of the project shall be limited to earth tones that will blend the facility into the colors of the surrounding site specific vegetation. The permittee shall obtain the written approval of the Planning Division prior to any change in paint color that differs from the approved building permit. Highly reflective surfaces are prohibited.*
- e. *Designated trash enclosure areas shall be made available and properly maintained for intended use.*

6.6 OUTDOOR STORAGE/SCREENING/UTILITIES

- a. *Details of outdoor storage areas and structures shall be included on the building and landscape plans. All outdoor storage of equipment shall be screened from the view of residences of adjacent properties by a visual barrier consisting of fencing or dense landscaping. No stored item shall exceed the height of the screening. Water and fuel tanks, and similar structures, shall be screened to the extent practical so as to not be visible from public roads and adjacent parcels.*
- b. *New utility lines required for this project that are visible from any designated scenic transportation route (see Community Character Element of the General Plan and the County Code) shall be placed underground or be made virtually invisible from the subject roadway.*

6.7 MECHANICAL EQUIPMENT

- a. *Roof mounted equipment shall be screened by a parapet wall of equal or greater height than the highest piece of roof mounted equipment or vent. Equipment may be screened by a separate roof screen that is architecturally integrated with the building if screening by a parapet wall is not feasible or is architecturally undesirable. When separate roof screens are used, roof equipment should be organized into major groups screening a smaller number of units rather than multiple areas. The PBES Director may approve exceptions for solar equipment. All screening is subject to review and approval by the PBES Director. Any skylights shall be subject to review and approval by the PBES Director prior to the issuance of building permits.*
- b. *The term "equipment" includes roof mounted equipment or vents, electrical equipment, gas meter, communication antennas, irrigation valves, storage tanks, or other mechanical equipment. The manner of screening shall be as follows: Communications equipment, including microwave equipment, may remain unscreened if visually integrated with the building design through color, location, and construction; all building mounted equipment, including but not limited to louvers, pipes, overhead doors or service doors, access ladders, downspouts, conduit, and electrical/service boxes, shall be painted consistent with the color scheme of the building.*
- c. *Ground mounted equipment shall be screened by walls or landscaping to the satisfaction of the PBES Director.*
- d. *Exterior equipment shall be located, enclosed or muffled so as not to exceed noise thresholds in the County Code.*

The existing entitlements allow for three (3) annual events for 50 people associated with the existing furniture/antique store (proposed Mercantile) that will not change. The project proposes to add four (4) monthly events for up to 85 guests of the Guest Inn only, which will occur outside in a dedicated area to the southeast of the bathroom and storage building. The applicant has proposed that all events will require a tent, which will require a Tent Permit through the Napa County Fire Marshall's office. The use of amplified music or amplification of any kind is prohibited, continuing enforcement of Napa County's Noise Ordinance by the Division of Environmental Health and the Napa County Sheriff, should further ensure that events and other related activities do not create a significant noise impact. Events and non-amplified music, including clean-up are required to finish by 10:00 p.m. as previously noted. Amplified music or sound systems would not be permitted for outdoor events as identified in Standard Condition of Approval 4.22 below. Temporary events would be subject to County Code Chapter 5.36 which regulates proposed temporary events.

4.2 AMPLIFIED MUSIC

There shall be no amplified sound system or amplified music utilized outside of approved, enclosed, onsite buildings."

- c. The project site is not located within an airport land use plan or the vicinity of a private airstrip. No impact would occur.

Mitigation Measures: None required.

XIV.	POPULATION AND HOUSING. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

- a. Cumulative impacts related to population and housing balance were identified in the 2008 General Plan EIR. As set forth in Government Code §65580, the County of Napa must facilitate the improvement and development of housing to make adequate provision for the housing needs of all economic segments of the community. Similarly, CEQA recognizes the importance of balancing the prevention of environment damage with the provision of a “decent home and satisfying living environment for every Californian.” (See Public Resources Code §21000(g).) The 2008 General Plan sets forth the County’s long-range plan for meeting regional housing needs, during the present and future housing cycles, while balancing environmental, economic, and fiscal factors and community goals.

The State of California’s Department of Finance projects the total population of Napa County to increase 4% between the year 2020 and 2060 (State of California Department of Finance Projections, July 19, 2021, <https://dof.ca.gov/forecasting/demographics/projections/>). Unincorporated Napa County, and the five incorporated jurisdictions, all have existing state compliant Sixth 2023-2031as required by state law. Complaint Housing Elements indicates that the jurisdictions have enough dwelling units programed over the cycle to meet or exceed state growth projections.

The requested use permit major modification would facilitate the operation of commercial uses on the project site consistent with the zoning of Commercial Limited, including the expansion of hospitality services. The addition of five (5) new employees is not anticipated to generate a substantial need for additional housing.

The proposed project does not require installation of any new infrastructure, including that which might induce growth by extending services outside of the boundaries of the subject site or increasing the capacity of any existing roadway. Napa County collects fees from developers of nonresidential projects to help fund local affordable housing (see Napa County Code Section 18.107.060 – Nonresidential developments – Housing fee requirement). The fees are assessed with new construction and/or alteration to the existing structures are collected at time of building permit issuance for new construction of new Inn bedroom and the interior conversion of the proposed Tavern space as is proposed with the project. New visitors to the site could increase demand for group transportation services, though the potential for employment changes of other businesses supporting the proposed Tavern, Mercantile, Coffee Cart and Guest Inn requested operations is uncertain, unquantifiable, and speculative.

The policies and programs identified in the General Plan Housing Element function, in combination with the County’s housing impact mitigation fee, ensure adequate cumulative volume and diversity of housing. With small staffing increases proposed and no off-site expansion of utilities or facilities to serve other developments, the project would have a less than significant impact on population growth.

- b. There is a single-family residence on the property that is proposed to be converted to a Guest Inn. The project proponents presently live in the single family residence on the property until which time the residence is converted to Guest Inn. Thus, no residents would be displaced, and there would be no impact.

Mitigation Measures: None required.

XV. PUBLIC SERVICES. Would the project result in:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
a) 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:				
i) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
v) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion:

- a. Public services are currently provided to the project area and the additional demand placed on existing services as a result of the proposed project would be minimal. Fire protection measures, such as access that meets Napa County Road and Street Standards (RSS), defensible space, and sprinklers in the existing and proposed buildings will be required as part of the development. The Fire Department and Engineering Services Division have reviewed the application and recommend approval, as conditioned. There would be no foreseeable impact to fire or police emergency response times with compliance with these conditions of approval. The proposed project scope does not include construction of any new residential units nor accompanying introduction of new residents that would utilize existing parks or potentially increase student enrollment in schools located in the city's northeast of the project site. No new parks or other public recreational amenities or facilities (such as police or fire stations) are proposed to be built with or as a result of the requested use permit major modification. School impact fees, which assist local school districts with capacity building measures, would be levied for any required building permits for the project, however as demonstrated in **Section XIV(a), Population and Housing**, the project is expected to create a minimal increase in the county's population and its need for housing such that local schools would not be strained by the proposed project and the increase in visitation, events, and employment. The proposed project would have minimal impact on public parks as no residences are proposed, and as previously noted the increase in regional population from the proposed project is expected to be minimal. Impacts to public services would be less than significant.

Mitigation Measures: None required.

XVI.	RECREATION. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	b) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

- a. The requested use permit major modification does not include any residential component and is not likely to lead to the accompanying introduction of new residents to the site or area. The use permit major modification would increase the number of employees and the number of daily visitors to the property, some of whom might visit regional recreational facilities on the way to or from the property. However, given that the purpose of employees' and guests' trips are to and from the Tavern, Mercantile and Guest Inn as the primary destination, such visits to area recreational facilities are anticipated to be infrequent and would not drastically accelerate the deterioration of the park amenities. This impact would be less than significant.
- b. No new public recreational amenities are proposed to be built with, or as a result of, the requested use permit major modification. The proposed project would have no impact.

Mitigation Measures: None required.

XVII.	TRANSPORTATION. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
	a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	c) Substantially increase hazards due to a geometric design feature, (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	e) Conflict with General Plan Policy CIR-14, which requires new uses to meet their anticipated parking demand, but to avoid providing excess parking which could stimulate unnecessary vehicle trips or activity exceeding the site's capacity?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion:

As part of the statewide implementation of Senate Bill (SB) 743, the Governor's Office of Planning and Research (OPR) settled upon automobile

vehicle miles of travel (VMT) as the preferred metric for assessing passenger vehicle-related impacts under CEQA and issued revised CEQA Guidelines in December 2018, along with a Technical Advisory on Evaluating Transportation Impacts in CEQA to assist practitioners in implementing the CEQA Guidelines revisions.

The County's General Plan Circulation Element contains a policy statement (Policy CIR-7) indicating that the County expects development projects to achieve a 15% reduction in project-generated VMT to avoid triggering a significant environmental impact. Specifically, the policy directs project applicants to identify feasible measures that would reduce their project's VMT and to estimate the amount of VMT reduction that could be expected from each measure. The policy states that "projects for which the specified VMT reduction measures would not reduce unmitigated VMT by 15 or more percent shall be considered to have a significant environmental impact." That policy is followed by an action item (CIR-7.1) directing the County to update its CEQA procedures to develop screening criteria for projects that "would not be considered to have a significant impact to VMT" and that could therefore be exempted from VMT reduction requirements.

The new CEQA Guidelines and the OPR Technical Advisory note that CEQA provides a categorical exemption (Section 15303) for additions to existing structures of up to 10,000 square feet, so long as the project is in an area that is not environmentally sensitive and where public infrastructure is available. OPR determined that "typical project types for which trip generation increases relatively linearly with building footprint (i.e., general office building, single tenant office building, office park, and business park) generate or attract 110-124 trips per 10,000 square feet". They concluded that, absent substantial evidence otherwise, the addition of 110 or fewer daily trips could be presumed to have a less than significant VMT impact.

The County maintains a set of Transportation Impact Study Guidelines (TIS Guidelines) that define situations and project characteristics that trigger the need to prepare a TIS. The purpose of a TIS is to identify whether the project is likely to cause adverse physical or operational changes on a County roadway, bridge, bikeway or other transportation facility, to determine whether the project should be required to implement or contribute to improvement measures to address those changes, and to ensure that the project is developed consistent with the County's transportation plans and policies. Per the County's current TIS Guidelines, a project is required to prepare a TIS if it generates 110 or more net new daily vehicle trips.

The TIS Guidelines also include VMT analysis requirements for projects based on trip generation, which includes a screening approach that provides a structure to determine what level of VMT analysis may be required for a given project. For a new project that would generate less than 110 net new daily vehicle and truck trips, not only is the project not required to prepare a TIS, it is also presumed to have a less than significant impact for VMT. However, applicants are encouraged to describe the measures they are taking and/or plan to take that would reduce the project's trip generation and/or VMT.

Projects that generate more than 110 net new passenger vehicle trips must conduct a VMT analysis and identify feasible strategies to reduce the project's vehicular travel; if the feasible strategies would not reduce the project's VMT by at least 15%, the conclusion would be that the project would cause a significant environmental impact.

a./c./d. A Transportation Impact Study, prepared by W. Trans, dated April 30, 2024, including discussion of access for pedestrians, bicyclists and to transit; and analysis that includes the estimated vehicle miles traveled (VMT) for the proposed project, including safety. The existing driveways and proposed circulation will be designed to comply with the Napa County Roads and Street Standards (RSS), including emergency vehicle access.

The subject parcel is located at the corner of Old Sonoma Hwy and Old Sonoma Road, with this intersection being one of three study areas considered within the TIS analysis.

1. State Route 12-121 / Old Sonoma Road
2. Old Sonoma Road / Old Sonoma Highway
3. State Route 12-121 / Old Sonoma Highway

The operating conditions and time periods that were evaluated included Friday and Saturday P.M. peak periods, which reflect the highest volumes for the proposed project, as well as high traffic volumes areawide. The Friday P.M. peak hour is evaluated between 4:00 and 6:00 P.M. and the Saturday P.M. peak hours occurs between 1:00 P.M. and 4:00 P.M. Specific counts were obtained for the study intersections on Friday, October 7, 2022, and Saturday, October 8, 2022.

Collision rates were considered based on the study area to determine any trends or patterns that may indicate safety issues. Collision history was considered for a five-year period between January 1, 2017 through December 31, 2021 based on records from the California Highway Patrol Statewide Integrated Traffic Records System (SWITRS) reports.

The collision history as shown in Table 1 of the TIS, for Old Sonoma Road / Old Sonoma Highway and State Route 12-121 / Old Sonoma Highway have collision rates that exceed that Statewide Average. These intersections were reviewed in further detail. There were three (3) collisions at the intersection of Old Sonoma Road / Old Sonoma Highway of which two (2) were hit objects involving turning vehicles

traveling south, and one (1) was a broadside collision. The TIS determined that given the nominal amount by which the crash rate exceeds the statewide average, and that two hit object collisions were reported to take place in different locations, no remedial action is necessary.

The second intersection with collision rates higher than the statewide average is State Route 12-121 / Old Sonoma Highway. Of the 19 collisions reported, 18 were hit object collisions, with 13 of those being attributed to improper turning, and four (4) of the crashes had a primary collision factor of driving under the influence. Of the 18 hit object collisions, 14 occurred outside the daylight hours and 15 involved vehicles traveling south, most often turning right from Old Sonoma Highway. Trip distribution as part of the requested project would expect that no project trips would be routed through the southbound approach of State Route 12-121 / Old Sonoma Highway. With no southbound trips along this problematic southbound approach, and since there is no nexus between the project and the specific safety issues no action is necessary by the applicant as part of the proposed project.

Sight distances along Old Sonoma Road and Old Sonoma Highway, at the four project driveways were evaluated based on sign distance criteria contained in the Highway Design Manual published by Caltrans. There are no posted speed limit signs along either roadway, therefore prima facie speed limit of 55 miles per hour (mph) was used to assess the sight distances. Based on a design of 55 mph, the minimum stopping distance sight distance needed is 500 feet. There will be no parking allowed on the paved shoulder, which was factored in to measuring sight distances to and from the two project driveways on Old Sonoma Road which is 600 feet in both directions. To ensure accurate calculations, a speed survey was performed showing an average 85 percent of speeds were 50 mph, indicating that the sight lines met the applied standards. The same factors were applied to Old Sonoma Highway, resulting in the same measurement of 600 feet to the west and to the western terminus of Old Sonoma Highway. Adequate sight distance is available for a following driver to observe and react to a preceding motorist slowing or stopping waiting to turn into the project driveways. The study concluded that sight distances at the project driveways are adequate to accommodate all turns into and out of the project site.

The circulation system of the study area analyzed pedestrian, bicycle and transit facilities. The study area is located in a rural area of the Napa County has limited pedestrian traffic, and while there is some pedestrian expected to walk on the shoulders of each side of the roadway, is considered acceptable, as the area lacks existing dedicated facilities for pedestrians given the rural setting. Bicycle facilities were equally considered as there are existing bike lanes along the frontage of Old Sonoma Road, additionally the 2019 Napa Countywide Bicycle Plan indicated four continuous miles of Class II (a striped and signed lane for one-way bike travel on a street or highway) are planned along Old Sonoma Road between State Route 12/121 and Jefferson Street. Although there was a single broadside collision at State Route 12/121 and Old Sonoma Highway, the report indicated the primary factor of the collision was due to the cyclist making an improper, illegal left-hand turn. The TIS has determined that no remedial action is necessary as adherence to the existing controls and restrictions on movement would eliminate the potential of a similar crash. As there is an existing Class II bike lane, the project proposes to include ten (10) park bicycle parking spaces with four (4) covered spaces. As for transit, there are presently no transit stops within a walkable distance of the project site. Transit demand to and from the project site is not anticipated given the rural nature of the project site and the type of project proposed. The project would not affect existing or planned facilities or services for alternative mode of travel, nor would it be expected to generate demand for such facilities or services. Impacts would be less than significant.

- b. As part of the statewide implementation of Senate Bill (SB) 743, the Governor's Office of Planning and Research (OPR) settled upon automobile vehicle miles of travel (VMT) as the preferred metric for assessing passenger vehicle-related impacts under CEQA and issued revised *CEQA Guidelines* in December 2018, along with a *Technical Advisory on Evaluating Transportation Impacts in CEQA* to assist practitioners in implementing the *CEQA Guidelines* revisions.

The TIS Guidelines include VMT analysis requirements for projects based on trip generation, which includes a screening approach that provides a structure to determine what level of VMT analysis may be required for a given project. The TIS Guidelines site that if a new project would generate less than 110 net new daily passenger vehicle and truck trips the project is presumed to have a less than significant environmental impact for VMT

The Traffic Study utilizing the Institute of Transportation Engineers (ITE) Trip Generation Manual, 10th Edition, 2017, calculating that the project would generate approximately 165 new daily trips during standard operations without implementation of trips or VMT reduction measures. During special events of up to 80 guests with five staff, the project would generate between 67 and 73 new daily trips which is below the County's 110 trip threshold. To comply with the County's VMT significance criteria, the unmitigated level of auto travel associated with the standard operation of the proposed project must be reduced by 15 percent, or 25 daily trips.

The land use mix associated with the proposed project would generate approximately 278 daily trips (before deducting existing trips). Accordingly, it is estimated that approximately 33 daily trips would be generated by employees (approximately 12 percent of the daily retail and hotel employees). It is recommended that the trip demand model plan strive to reduce employee travel by 20 percent, or seven daily trips. Of the 278 daily trips, 245 trips would be associated with visitor-based travel. This translates to 123 inbound visitors per day.

The Napa County guidance visitor-based trips are assumed to have average weekday vehicle occupancy of 2.6 persons per vehicle. The TIS multiplies the 2.6 persons per vehicle by the inbound daily visitor vehicles trips of 123 for an estimated 302 daily visitors/guests patronizing the project. By increasing the average number of people transported in each vehicle to 2.8 person would result in 114 inbound visitor vehicles. A reduction of nine inbound visitors or 18 daily trips. This in addition to a reduction in seven daily employee trips would be 25 fewer daily trips. In order to accomplish these reductions a Traffic Demand Management (TDM) Plan shall be implemented that reduces the project's daily trip generation by 25 trips, relying on a combination of measures to reduce both employee and visitor related auto travel. Napa County Department of Public Works has included a TDM Plan as part of the department Conditions of Approval, dated May 13, 2024 (Attachment G). As part of the TDM, a program The project would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). Impacts would be less than significant with implementation of a TDM plan as conditioned by Napa County Department of Public Works.

- e. Napa County Code (NCC) Section 18.110 "Off-street Parking and Loading facilities" for properties zoned Commercial Limited requires parking spaces at a rate of one (1) per unit and one for each non-resident manager. Additionally, the proposed retail land use and restaurant (including bars and taverns) requires parking spaces at a rate of one (1) per 250 sf and one (1) per 120 sf, respectively. The proposed project would require a minimum of 34 parking spaces in order to accommodate the proposed land uses. The project is proposing 36 spaces in total, two additional parking spaces than what is required. The parking lots would not provide excessive parking. The parking lots will be improved to meet the location, design, and landscaping requirements of NCC 18.110 and 18.28.070 Commercial Limited parking. The proposed project would not be in conflict with General Plan Policy CIR-14 which requires new land uses provide adequate parking that meeting existing and proposed demands. Impacts would be less than significant.

Mitigation Measures: None required.

XVIII. TRIBAL CULTURAL RESOURCES. Would the project 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:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion:

- a/b. On May 22, 2024, County Staff sent invitations to consult on the proposed project to Native American tribes who had a cultural interest in the area and who as of that date had requested to be invited to consult on projects, in accordance with the requirements of Public Resources Code section 21080.3.1. Staff did not receive a response for consult or to provide comment.

Mitigation Measures: None required.

XIX.	UTILITIES AND SERVICE SYSTEMS. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
a)	Require or result in the relocation or construction of a new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c)	Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d)	Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e)	Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion:

- a. A Wastewater Feasibility Study, prepared by NorCal Civil Engineering, LLC, explains that a code compliant septic system will need to be installed, replacing the existing system in order to comply with State requirements as well as accommodate the proposed increase in employees, guests, and other activities generating domestic waste. Based on site evaluation results, the recommendation is to design and install a subsurface drip irrigation septic system. The system design will accommodate flows from proposed uses, including installation of low flow fixtures. Design flows are estimated for a peak flow of 2,168 gallons per day which accounts for all proposed uses occurring at the same time; however, proposed events will occur at times when the Tavern and Mercantile are not open, and the mobile Coffee Cart operating prior to opening of the Tavern.
- A pretreatment system proposed will consist of one AdvanTex AX100 commercial textile filter and associated septic tank and recirculation system, and pumping system. The subsurface drip system is required to be equal to 200% of the primary area, which is 6,194 sf. The area identified is equal to 9,341 sf with a total area required of 9,291 sf, which accommodates and area equal to 302%. There is more than sufficient area to develop the required septic dispersal field. A sump tank of 5,000 gallons will accommodate 2.3 times the daily design flow. The sump tank will allow for storage of the Highwater Alarm and flow equalization. Additional sump tanks are anticipated due to site layout, with suitable locations to be identified with future detailed design provided as part of permitting requirements to be reviewed by Environmental Health, and in accordance with conditions of approval, dated April 15, 2024. Impacts are expected to be less than significant.
- b. As discussed in Section X. according to the Water Availability Analysis Report prepared by EBA Engineering, an onsite water audit was completed and the existing water use associated with the art gallery and residence is estimated to be 0.86-acre feet per year. Because the parcel is located outside the Napa Valley subbasin, the project was required to provide a Tier 1 analysis and a parcel specific recharge, which was calculated at 3.62 acre-feet per year. The project would increase water demand by 1.77 acre-feet per year if approved. The total amount of annual recharge is equivalent to is 2.43 acre-feet per year. The total annual septic return flow to groundwater for the proposed project is estimated to be 1.94 acre-feet per year. The project groundwater demand is proposed to be 2.70 acre-feet per year, less than the recharge rate and septic return flow; and therefore does not require County's project specific Condition of Approval for well monitoring. Impacts would be less than significant.
- c. As detailed in sections X. Hydrology and XIX. Utilities and Service Systems the existing on-site domestic waste system and proposed system to accommodate the proposed increases. The Division of Environmental Health reviewed this report and concurred with its findings, conditioning that the selected design and plans shall be designed by a licensed Civil Engineer or Registered Environmental Health Specialist and approved by the Division of Environmental Health. The project is not served by a wastewater treatment provider, therefore no impact would occur.

- d/e. According to the Napa County Baseline Data Report, all of the solid waste landfills where Napa County's waste is disposed have more than sufficient capacity related to the current waste generation. The project would comply with federal, state, and local statutes and regulations related to solid waste. Therefore, impacts would be less than significant.

Mitigation Measures: None required.

XX.	WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
a)	Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d)	Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion:

- a. There are no proposed project features that would substantially impair an adopted emergency response plan or emergency evacuation plan. The driveway is proposed to meet commercial standards as defined in the RSS. The driveway will be widened and provide access and turnarounds in compliance with commercial standards and improve access for emergency vehicle. Conversion of the existing residence to a Guest Inn and the addition of five (5) new guest cottages/ units would be required to comply with the most currently adopted building codes, including installation of sprinklers and fire suppression equipment.
- b. According to the Napa County Environmental resource maps (based on the following GIS layer – Fire Hazard Severity Zones) the property is not located within a mapped fire hazards severity zone. The parcel is located within a local responsibility area (LRA) with the nearest fire station located approximately 1,300 feet to the east on Old Sonoma Road. The proposed physical improvements are within the existing developed area of the site. The physical improvements and operational changes would not result in a substantial physical modification to the site, change prevailing winds, or alter other factors that would likely exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.
- c. There are changes to the driveway that will include additional parking and improved access to emergency vehicles and visitors. The Fire Marshal's office has reviewed the plans, which demonstrate that the project would have adequate emergency access to the existing development and proposed additions. The driveway off Old Sonoma Road and Old Sonoma Hwy will provide improvements to the driveway for emergency vehicle access. The new buildings would be equipped with sprinklers and fire suppression equipment. These developments are not considered the types of improvements that exacerbate wildfire risk or significant environmental risk. Impacts will be less than significant.
- d. The physical improvements are in an area of the site that has been previously developed. The proposed project would not physically alter the site in a way, which would expose people or structures to risks such as downstream or downslope flooding or landslides resulting from runoff, post-fire instability or drainage changes. Impacts would be less than significant.

Mitigation Measures: None required.

XXI.	MANDATORY FINDINGS OF SIGNIFICANCE	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
a)	Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c)	Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion:

- a. The proposed project consists of changing the use of several structures onsite, include the approved Art Gallery to a Mercantile, Bike/Guided Touring and Luxury Car Excursion to a Tavern, and the existing single-family residence to be converted to an eight (8) bedroom Guest Inn. The project proposes to construct five (5) stand-alone units for the Guest Inn, restroom building with storage, and interior alterations to each structure to accommodate changes in uses. The project also proposes space for a mobile coffee cart.

Proposed site improvements include widening the existing driveway, additional pervious parking area, addition of 28 new parking spaces for a total of 36 onsite. The existing septic system will be upgraded prior to conversion of the single-family residence as discussed in Section X. The project site has been zoned Commercial Limited since 1978, and a series of commercial uses have been approved, including the most recent Use Permit Modification approval to allow an Art Gallery and antique furniture store, Bike/Guided Touring company and Luxury Car Excursion. The project site has been mapped as urban or built up under the Napa County GIS Vegetation Layer. There were no resources mapped on site or the immediate vicinity. Archeological Resource Services performed an archeological resource management report, dated May 31, 2023. There were no archeological resources found. There are two structures on the property that based on age could qualify as historic; however, given the extensive renovations to the structures, it seems unlikely to qualify to be a registered historic. The project proposes ground disturbance and construction. If resources and/or human remains are found during any earth disturbing activities associated with the project, construction of the project is required to cease, and procedure shall be followed in accordance with Napa County standard conditions of approval.

- b. The project does not have impacts that are individually limited, but cumulatively considerable. Potential impacts to air quality, greenhouse gas emissions, hydrology, and traffic are discussed in the respective sections above and were determined to have a less than significant impact. As discussed in Section VIII. Green House Gas and Section XVII. Transportation, potential impacts to air pollution and GHG emissions are being addressed through meeting Bay Area Air Quality recommended design elements, with the addition of Greenhouse Gas Voluntary Best Management Practices, and VMT reduction strategies through implementation of a TDM Plan as prescribed by the Department of Public Works. Section X. Hydrology includes detail on the Water Availability Analysis which demonstrates that the

proposed project would increase water use by 1.80 af/yr, that represents 75 percent of the total groundwater recharge demonstrated for the project site. In accordance with standard condition of approval, well monitoring shall be implemented that monitors static groundwater levels no less than quarterly (four times per year) and the volume of water collected monthly. The proposed sanitary waste subsurface drip sewage treatment system shall be designed by a licensed Civil Engineering or Registered Environmental Health Specialist and submitted for review to the Napa County Division of Environmental Health prior building permit clearance. Potential cumulative impacts would be less than significant.

- c. All impacts identified in this negative declaration are less than significant and do not require mitigation. Therefore, the proposed project would not result in environmental effects that cause substantial adverse effects on human being either directly or indirectly. Impacts would be less than significant.

Mitigation Measures: None required.
