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**Brian D. Bordona**  
Director

To:	Brian D. Bordona, PBES Director	From:	Andrew Amelung, Planner II
Date:	October 15, 2025	Re:	P24-00141-MM Silverado Resort & Spa Use Permit Minor Modification Categorical Exemption Determination 1600 Atlas Peak Rd, Napa APN: 060-010-001-000

**Background:**

The proposed project will allow the conversion an existing outdoor hospitality area consisting of a landscaped courtyard, storage shed, staging structure, and burger shack all known as The Grove to an indoor event pavilion (9,308 square feet) and an event lounge (1,750 square feet). The proposed construction will result in an additional 11,058 square feet of resort use to the existing resort mansion (21,080 square feet), convention center (26,100 square feet), and hotel space (221,000 square feet). The proposal also involves landscaping elements that include event and activity lawns (19,062 square feet), landscaped planting beds (23,456 square feet), and native grass area (41,224 square feet). An Exception to the Napa County Road and Street Standards (RSS) is also requested to permit a firetruck turnaround and Emergency Vehicle Access (EVA) road to be located approximately 260 feet from the proposed event lounge. The RSS require that the EVA be no greater than 50 feet from the proposed event lounge. The Exception to the RSS is requested to preserve the natural location of an unnamed blue line stream that serves as a tributary to Milliken Creek. The removal of eight valley oak trees is included in the project proposal, with a replanting ratio of 4:1 resulting in 32 new valley oaks of 15-gallon minimum size will be planted on the property.

Under Napa County Code (NCC) §18.124.130, minor modifications to use permits can be approved by the zoning administrator or the Planning Commission for changes in location and/or size of approved structures or portions thereof, provided that the approval of the requested minor modification would not affect the overall concept, density, intensity or environmental impact, and would not result in any structure or the aggregate of all approved structures being increased by 25 percent in size or one story in height based on size allowed under the approved use permit. The proposed increase of 11,358 square feet of resort space represents a 24.1 percent increase to just the resort mansion and convention center, however when the 221,000 square feet of hotel space is included, it represents merely 4.24 percent increase in size. The Silverado Resort and Spa, also known as the Silverado Resort and Country Club, is one of the oldest Master-Planned Development Projects in Napa County. With the original golf

course dating back to the 1950s, the resort itself was established first through a 1964 rezone to the PC (Planned Community) zoning district, followed by the approval of a master site plan and use permit. Several additional ministerial and discretionary permits have been approved since then, including additional community subdivisions, remodel permits for the clubhouse and pro shop, outdoor advertising permits, expansions to the clubhouse and conference center, building permits for accessory structures, watercourse alteration permits, parking expansions, and tournament entitlements.

The Planned Development (PD) zoning district (formerly the PC zoning district) is intended to be applied in those areas of the county shown as “urban residential” to increase the opportunity for diversified uses by providing a means for integrating townhouse, row house, condominium and cluster housing in a desirable relationship to planned common use space, limited commercial, institutional, educational, cultural, recreational and other uses, while at the same time preserving the quality of urban environment fostered by the general plan.

#### **Existing Conditions and Environment Setting:**

The proposed project is located on an approximately 278.73-acre parcel within the PD zoning district with an Urban Residential (UR) General Plan designation located at 1600 Atlas Peak Rd, Napa, CA; APN: 060-010-001-000. The project site, as well as much of the surrounding area, has been heavily modified by decades of master-planned resort and residential development. The site is located within an area of the Silverado Resort and Spa commonly referred to as “The Grove.” The Grove is an area of land surrounded by the South Golf Course with a tributary of Milliken Creek running through it from north to south. The area is developed in a manner similar to an urban park, with professional landscaping, a large courtyard patio, foot and golf cart bridges, golf course restrooms, and a burger and hotdog stand, as well as a fenced off area for equipment storage. The area experiences heavy pedestrian and golf cart traffic throughout the day as guests of the resort often congregate in the courtyard patio area to eat and socialize. The site is also the location of several events throughout the year that primarily consist of weddings, dinners, and musical performances. The proposed pavilion and lounge will provide additional facilities and accommodation for hosting these events throughout the year. The number of events, type of events and duration of events will not increase and will remain consistent with existing operations.

Primary access to the project site is from Atlas Peak Road, a designated a county collector road, with access to Hardman Avenue, a county arterial road approximately 0.12 miles to the north, as well as Highway 121 (Monticello Road), another county arterial road, approximately 0.84 miles to the south. Additional emergency vehicle access routes connect to the project site via Hillcrest Road, which also has access to Highway 121 located approximately 0.61 miles from the emergency access point. Highway 121 is a designated viewshed road, however the project site is not visible from any vantage points within the immediate vicinity.

Land uses within the immediate vicinity include planned development, urban residential, single and multifamily units developed within 24 distinct clusters that are part of the original master-planned community. In 1981, a Development Agreement was adopted by the Board of Supervisors that replaced an unbuilt shopping center and unbuilt condominiums with single family residences. The agreement identified cluster units that are subject to being rented on a daily, weekly, or other limited term basis, and to this day these are the only residential units within the County that are entitled to short-term rentals and transient occupancy. Other land uses within one mile of the proposed project include rural

residential units and agriculture, primarily vineyards, orchards and grazing land, in the AP, AW, and RC zoning districts to the west, rural residences and open space in the AW zoning districts to the north and east, and more densely populated residential units in the RC and RS zoning districts to the south.

The City of Napa is approximately 1.63 miles to the south, and the area immediately to the south and southwest of the project parcel is classified as a secondary sphere of influence study area (Monticello Area) in the 2014 City of Napa Sphere of Influence Review and Update. The parcel is currently served by City of Napa utilities, and the proposed project will continue to utilize City of Napa Water District and Napa Sanitation District services. The proposed project is located in the County of Napa garbage and recycling Zone 1, an area that is served as part of an exclusive franchise agreement with Napa County Recycling and Waste Services. The project is located within the Napa Valley Unified School District, with one elementary school located within one mile. The Napa County Airport is the closest airport located approximately 8.65 miles from the proposed project. There are two producing wineries within the immediate vicinity of the proposed project: William Hill Winery is located on an adjacent parcel to the northwest, and is currently producing up to 720,000 gallons of wine per year, with visitation entitlements of up to 13,000 visitors per year, while Del Dotto Winery is located just south of the proposal, and is currently producing up to 20,000 gallons per year, with visitation entitlements of up to 2,600 visitors per year.

There are two primary geologic units at the project site. To the west there is a quaternary surficial alluvium deposit from the Holocene and late Pleistocene epoch, while to the east there is a Sonoma volcanic sedimentary deposit from the Pliocene-Miocene epoch. This divide has resulted in two primary soil types: Yolo loam found in the alluvium deposit to the east and Hambright-Rock outcrop complex found in the volcanic sedimentary deposit to the west. Yolo loam generally occurs in areas between 0 to 10 percent slope, is well drained with moderate permeability and a high, water capacity and can be susceptible to erosion. It is often found in valleys and areas of prime farmland. Hambright-Rock outcrop complex generally occurs in areas between 2 to 30 percent slope, is well drained with a very low water capacity and moderate permeability, and it has medium to rapid runoff. This soil type is unique to this specific geographic area and can be found on hillsides generally used for grazing.

The project site is not in a dam levee inundation area, is not located near areas prone to landslides, and is approximately 0.69 miles to the east from Fault 62500, the nearest active fault. A major safety hazard associated with the project site is the existing floodplain. According to the National Flood Hazard Layer from FEMA, areas surrounding the project site, including portions of proposed landscape area, are within Flood Hazard Areas A and AE, meaning these areas are subject to inundation by the one percent chance or 100-year floodplain area and are considered high-risk flood zones.

The tributary of Milliken Creek that runs north to south through the Grove merges with Milliken Creek approximately 2,210 feet south-southwest of the project site. The tributary is intermittent with a relatively narrow riparian zone dominated by valley oaks and ash trees. The channel which is typically dry will experience high, fast water events associated with prolonged or heavy rainfall. The confluence of Milliken Creek and the Napa River is located approximately 2.22 miles downstream from its merger with the tributary.

According to Napa County GIS data, Milliken Creek is identified as a Key Riparian Corridor using a dataset that is comprised of rivers and streams selected from Steelhead trout critical habitat (NOAA

Fisheries, Southwest Regional Office), runs for Steelhead trout (Leidy, et al. 2005, Becker et al. 2007, Becker and Reining 2008, 2009) or Coho Salmon (Shannon and Christy 2010), or streams inhabited by either California roach or riffle sculpin (Leidy 2008). While Milliken Creek is identified as a Key Riparian Corridor, the tributary that runs through the project site is not.

The Napa County GIS Vegetation dataset identifies the area as containing riparian woodland and developed area vegetation types. This is based on mapping that was completed in 2016 by a University of California Davis group using a 2016 edition of one meter color aerial imagery taken by the National Agriculture Imagery Program (NAIP) as the base imagery. While aerial imagery can provide baseline information, actual site conditions vary significantly from what is visible on aerial images with what is observed during site assessments, and ground reviews are necessary to confirm the presence, extent, and condition of habitat types.

According to the California Natural Diversity Database (CNDDDB), the project site is not part of an area identified as a habitat for rare species or natural community types, however there are two areas on the parcel identified for rare species. Occurrences of Napa bluecurls (*trichostema ruygtii*) have been identified approximately 0.35 miles to the west of the proposed project. The Napa bluecurl is a species of flowering plant in the mint family and was first described in 2006. It can be found along Atlas Peak Road near the resort entrance. Approximately 0.62 miles to the north, occurrences of narrow-anthered brodiaea (*brodiaea leptandra*) have been identified, which is a perennial herb that is native and endemic to California. Neither species were identified in the habitat assessment and are not believed to occur at the project site.

Zentner Planning and Ecology conducted a site review and habitat assessment of the project site on August 19, 2024. Regarding the mapped riparian woodland habitat classification, the assessment concluded that this “is a good example of when large-scale mapping based on aerial images can be inaccurate.” The mapped riparian woodland vegetation community is shown as extending north, northwest of the project site into the center portion of the golf course. This center portion of the mapped area is devoid of any waterways and the understory and surroundings are developed golf course fairways and rough; it is not riparian habitat. In addition to this, the study concludes that the mapping fails to pick up numerous other pockets of relictual oak woodland habitat within and outside the resort and instead labels much of the parcel as it all as “Developed” which is the case for a majority of the project site. The assessment goes on to state the “project site and surrounding oak trees are, in fact, remnants of oak woodland and oak savannah habitat that once dominated this region.”

Concerning the riparian classification, the assessment states that “(at) the project site, the presence of hydrophytic vegetation and other riparian indicators occur within the ephemeral channel’s top of bank. A true riparian habitat, such as that which exists (on the parcel) at Milliken Creek, contains a diverse structure of vegetation with different levels of canopy. Instead of this, the ephemeral tributary onsite contains a scattering of primarily valley oaks within the top of bank, with little to no vegetation beneath, except non-native annual grassland.” This non-native annual grassland is also part of the golf course rough.

The project is located within the PD zoning district, and as such the 3:1 replacement ratio described in Napa County Code §18.108.020 (Conservation Regulations) for the AW zoning district does not apply. Despite this, the project is proposing a 4:1 replacement ratio for the eight valley oak trees to be

removed, with submitted plans for the replanting of 32 valley oak trees on the property (See Attachment H). This is consistent with General Plan Policy CON-24, which requires the replacement of lost oak woodlands or preservation of like habitat at a minimum of 2:1 ratio when retention of existing vegetation is found to be infeasible. The 32 trees will be planted across six designated areas on the parcel and will include a minimum size of 15-gallon oak plantings. The eight valley oak trees to be removed represent a reduction from the original ten valley oak trees marked for removal, and an amended habitat assessment dated August 27, 2025 has been submitted to reflect the reduction in tree removal and increase in replanting ratio.

The applicants submitted a Grove Event Noise Study completed by Salter Acoustical Consultants dated September 30, 2024 (See Attachment G). The study is based on two noise measurement locations, one attached to the courtyard perimeter fence and another was attached to a tree near the property line and closest residence to the proposed project. Three outdoor events were measured that include a dinner with 25 guests that took place on August 28, 2024, a wedding with 200 guests that took place on August 31, 2024, and another wedding with 100 guests that took place on September 1, 2024. The dinner included an amplified violin and background music and reached a decibel level (dBA) of 57 dBA at the measurement location near the property line. The August 31<sup>st</sup> wedding included a 14-piece amplified band and reached 78 dBA at the property line, while the September 1<sup>st</sup> wedding included a DJ and reached 73 dBA at the property line. These existing noise levels approach or exceed the exterior noise levels described in General Plan Policy CC-38 for urban single-family and duplex residential units for both daytime (7 a.m. to 10 p.m. – 60 dBA) and nighttime (10 p.m. to 7 a.m. – 50 dBA) levels. The Noise Study demonstrated that with the amplified bands and DJs being moved indoors to the new Pavilion Building, the new event space will have interior acoustic treatment to reduce overall noise levels below the County's maximum daytime and nighttime noise thresholds. Ceremonies with without amplified noise that would exceed Napa County noise standards will still be held outdoors, and there will be no change in event types, maximum size, or duration compared to existing operations. With exterior doors and windows shut and the physical design features described below incorporated into the new Pavillion Building, a significant noise reduction of at least 35 dBA at the property line would prevent exceedances of the noise thresholds.

To further support this reduction in noise, the applicant provided a follow-up noise study that clarified the lounge structure will not be a source of noise exceeding General Plan standards, and the pavilion building design will incorporate the following physical features to reduce noise to acceptable levels: acoustic panels Type AP-1 with MechoShade blackout shades for exterior glazing, which will effectively reduce overall noise buildup within the space. The walls will be Type W1, which is an insulated single metal stud wall with one layer of gypsum board on the interior, with the exterior face being comprised of plywood, one-inch-thick sheathing, and polyash siding finish. Exterior glass swing doors will use a tested STC 33 system with 3/4-inch-thick glass with 3/8-inch airspace, kerfed gaskets, door sweeps, door shoes, and weather stripping, in addition to exterior glass bifold doors using a tested STC 41 system. All of these features, other exterior glazing improvements and closure of exterior doors and windows during all events will ensure the noise reduction of at least 35 dBA at the property line. The applicant's revised project description includes when doors and windows are shut during all events with amplified noise that could exceed Napa County noise standards, and that the amplified noise will be reduced to below that standard, as event sizes can range from small groups to over 600 people. These measures have also been included in the Condition of Approval.

**CEQA Exemption Criteria and Analysis:**

Article 19 of the State Guidelines for Implementation of the California Environmental Quality Act (CEQA Guidelines) establishes a list of classes of projects that are categorically exempt from the provisions of CEQA. This project qualifies as an exempt activity under two (2) sections of Article 19:

**Class 1: Existing Facilities [California Code of Regulations (CCR) §15301(c)]**

Consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features involving negligible or no expansion of existing or former use. The key consideration is whether the project involves negligible or no expansion of use.

**Analysis:** Napa County CEQA Guidelines for Class 1: Existing Facilities, Section 3, describes Very Minor and Minor Modifications of existing use permits in conformance with NCC §18.124.130(B) as qualifying as a Class 1 Categorical Exemption. The proposed project meets the requirements NCC §18.124.130(B) as the increase of 4.24 percent of aggregate resort square footage does not exceed the 25 percent threshold described in NCC §18.124.130(B). Furthermore, the key consideration for existing facilities is whether the project involves negligible or no expansion of use. Weddings and events are already allowed at the resort throughout the year with a number of options for venue locations, and while the proposed project will allow weddings at The Grove location to extend beyond May through October, it will not allow for any increase in the intensity of use for events as the resort currently has no limit on the number of events it can host throughout the year, and as such there will be a negligible expansion of use from their existing entitlement.

**Class 4: Minor Alterations to Land [California Code of Regulations (CCR) §15304(a), (b), and (f)]**

Consists of minor public or private alterations in the condition of land, water, and/or vegetation which do not involve removal of healthy, mature, scenic trees except for forestry and agricultural purposes. Examples include but are not limited to:

(a) Grading on land with a slope of less than 10 percent, except that grading shall not be exempt in a waterway, in any wetland, in an officially designated (by federal, state, or local government action) scenic area, or in officially mapped areas of severe geologic hazard such as Alquist-Priolo Earthquake Fault Zone or within an official Seismic Hazard Zone, as delineated by the State Geologist.

(b) New gardening or landscaping, including the replacement of existing conventional landscaping with water efficient or fire-resistant landscaping.

(f) Minor trenching and backfilling where the surface is restored.

**Analysis:** The project involves minor private alterations in the condition of land and vegetation. The project proposes the removal of ten valley oak trees that are healthy and mature, however they are not located in a designated scenic corridor and are not visible from a designated scenic road, and as such would not qualify as scenic trees. The primary development site, including the emergency vehicle access path, consists mostly of slopes between 0-5 percent, overall it does not exceed 10 percent, and will not occur in any waterway or wetland. The project is not located in a severe geologic hazard area or seismic

hazard zone. All new landscaping can be considered a replacement of the existing landscaped area and will be required to meet Napa County's Water Efficient Landscape Ordinance standards. Minor trenching for utility connections will include backfill and the surface will be restored.

**Conclusion:**

The project is categorically exempt from CEQA under §15301, §15304(a), (b), and (f). Under CEQA §15300.2, a project may only qualify as a Class 4 categorical exemption if the project does not present any significant effects due to unusual circumstances, cumulative impacts, scenic highways, hazardous waste sites, or historical resources. The proposed project is in the Planned Development zoning district and Urban Residential General Plan Designation, both of which support a project of this nature within Napa County. No cumulative impacts are expected as the master-planned resort has been designed for such capacity and use. The project site is not situated in a scenic corridor and is not visible from any Napa County viewshed roads. The project is not located on a hazardous waste site, and a statement has been prepared by the applicant demonstrating the removal of the existing "Burgerdog Shack" currently located at the project site does not constitute an impact to any historical resource. Therefore, the project does not present any exceptions to the Class 4 categorical exemption.