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Recommended Resolution

Inn at the Abbey Use Permit Major Modification (P19-00038-MOD) and
Development Agreement
Planning Commission Hearing Date March 4, 2026

RESOLUTION NO. 2026-__

A RESOLUTION OF THE NAPA COUNTY BOARD OF SUPERVISORS (1) CERTIFYING THE FINAL ENVIRONMENTAL IMPACT REPORT PREPARED FOR THE INN AT THE ABBEY HOTEL PROJECT - USE PERMIT MAJOR MODIFICATION (NO. P19-00038-MOD); (2) ADOPTING FINDINGS AND REJECTING THE NO PROJECT ALTERNATIVE, THE REDUCED DEVELOPMENT ALTERNATIVE (ALTERNATIVE B) AND THE NORTH PARCEL ALTERNATIVE (ALTERNATIVE C) IN ACCORDANCE WITH THE CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) AND NAPA COUNTY'S LOCAL PROCEDURES FOR IMPLEMENTING CEQA; (3) ADOPTING A MITIGATION, MONITORING AND REPORTING PLAN; (4) FINDING THE PROJECT CONSISTENT WITH THE NAPA COUNTY GENERAL PLAN; (5) AND APPROVING USE PERMIT MAJOR MODIFICATION NO. P19-00038-MOD FOR THE INN AT THE ABBEY SUBJECT TO CONDITIONS OF APPROVAL

WHEREAS, on or about February 15, 2019, Jackson Family Investments III, LLC (JFI III or the Applicant) submitted an application for Use Permit Major Modification No. P19-00038-MOD to the Napa County Planning, Building and Environmental Services (PBES) Department requesting approval of a Use Permit Major Modification (Modification) to redevelop the existing Freemark Abbey Winery Complex by demolishing three commercial buildings currently used as a restaurant, retail wine shop, art gallery, and five-room motel and the construction of a 79-room hotel, retail and hotel lounge space, a spa, pool, underground parking, fitness room, and back-of-house uses, and continue to allow on-site housing and winery and ancillary uses on the 11.5 acre Ag Watershed zoned parcels. The project would involve the demolition of three buildings. The proposed 79 rooms would be split between the North Parcel (50 rooms) and the South Parcel (29 rooms). Minor interior renovations to the existing Stone Building may be required to serve as the hotel's main lobby, meeting space, and/or a dining component. The proposed North Hotel Building (55,000 sf) would replace an existing restaurant building and would be used for the 50 guest rooms, spa, retail operations, circulation, and back-of-house uses. An underground parking garage would be located below the North Hotel Building and would include 54 stalls for valet parking. On the South Parcel, the existing restaurant and five-room motel buildings would be replaced with a South Hotel Main Building, South Hotel Barn Building, a freestanding fitness studio, and The South Hotel Main Building would include 11 guest rooms, support kitchen and back-of-house uses. The South Hotel Barn Building would include 12 guestrooms with adjacent plunge pool. Buildings on the South Parcel would be connected by a series of walkways, breezeways, patios, courtyards, and landscaped areas. The South Parcel also includes six existing on-site residential dwelling units that would be used to house employees;

WHEREAS, the Project site is located in unincorporated Napa County, approximately one-half mile north of the city limits of St. Helena. The Project is comprised of a 15.13-acre site composed of six parcels located at Lodi Lane along SR 29. The "North Parcel" is approximately 10.30 acres and consists of the four parcels located north of Lodi Lane. The four contiguous parcels are Assessor's Parcel Numbers (APNs) 022-130-027, 022-130-028, 022-130-023, and 022-130-024. The "South Parcel" is approximately 4.83 acres and consists of the two parcels

located south of Lodi Lane. The two contiguous parcels are APNs 022-220-028 and 022-220-029. The North Parcel and South Parcel are collectively referred to as the “Project site” throughout project documents and the EIR;

WHEREAS, in April 2020, the PBES Department assisted by planning consultant ESA initiated the environmental review process required by the California Environmental Quality Act (CEQA), to analyze the potential environmental impacts of the Project;

WHEREAS, on July 23, 2020, an Initial Study/Environmental Checklist was prepared to identify areas to be further discussed in an environmental impact report (EIR);

WHEREAS, on July 23, 2020, a formal Notice of Preparation of an EIR (NOP) was issued soliciting public input regarding the Draft EIR for the Inn at the Abbey Project. The comment period was from July 23, 2020, to August 24, 2020;

WHEREAS, on August 5, 2020, Napa County Planning Commission held a public scoping session, in conjunction with circulation of the NOP, to elicit additional comments from the public on the scope and content of the DEIR. Comments received on the NOP were considered in the preparation of the DEIR;

WHEREAS, in conjunction with the Use Permit Major Modification, the Applicant volunteered terms to be included in a Development Agreement (DA) with the County as a component of the potential project approval;

WHEREAS, on December 5, 2023, the Napa County Board of Supervisors publicly discussed the terms and provided initial directions to staff and the Applicant on potential terms and revisions to a draft term sheet for the DA. The DA terms were revised and approved by the Board at a public meeting held on May 21, 2024;

WHEREAS, the County, as lead agency, caused to be prepared a Draft EIR (or DEIR) for the Project (April 2025) (State Clearinghouse No.20200792021);

WHEREAS, in accordance with CEQA, on April 10, 2025, the County issued a Notice of Availability (NOA) of the Draft EIR for public and agency review. The public comment period ran from April 10, 2025, to May 27, 2025;

WHEREAS, on May 7, 2025, the Planning Commission held a public hearing on the Draft EIR for purposes of receiving public comment;

WHEREAS, during the public comment period, the County received twelve public and agency written and verbal comments on the Draft EIR;

WHEREAS, in accordance with CEQA, all comments received on the Draft EIR during the comment period were responded to and included in a Final EIR or FEIR. The FEIR includes the Draft EIR and comments and responses to comments on the Draft EIR and minor text

changes to the Draft EIR in the form of an Errata to the DEIR, the FEIR (February 2026) and the Appendices A through M attached to the DEIR and as revised in the FEIR;

WHEREAS, on February 19, 2026, in accordance with CEQA, the Final EIR was mailed to all commenting state and local agencies, organizations and individuals at least ten days prior to the Planning Commission's action on the Project;

WHEREAS, the FEIR is on file with the PBES Department along with all other documents constituting the record of proceedings;

WHEREAS, because the Board of Supervisors is the decision maker on the Development Agreement which is a companion action necessary to approve the use permit modification, the Planning Commission shall make an advisory recommendation to the Board to approve or disapprove the entire action, and the Board shall thereafter make the final decision on the entire action, including any determination to be made under CEQA, in accordance with Napa County Code Section 18.124.010;

WHEREAS, on February 19, 2026, notice of a public hearing before the Napa County Planning Commission on the Commission's recommendations to the Board regarding a proposed Resolution: (1) Certifying the FEIR; (2) Adopting Findings and Rejecting the No Project, Reduced Development and North Parcel Alternatives Pursuant to CEQA; (3) Adopting a Mitigation Monitoring and Reporting Plan (MMRP); (4) the Project's consistency with the General Plan; (5) Approving Use Permit Major Modification No. P19-00038-MOD subject to the recommended Conditions of Approval; and (6) Adoption of an Ordinance approving a Development Agreement between Napa County and JFI III was mailed, published and posted in accordance with County Code Section 18.136.040, and Government Code Sections 65867, 65090 and 65091;

WHEREAS, on March 4, 2026, the Planning Commission held a duly noticed public hearing and after considering all verbal and written testimony recommended that the Board of Supervisors adopt the proposed Resolution to: (1) Certify the FEIR; (2) Adopt Findings and Reject the No Project, Reduced Development and North Parcel Alternatives pursuant to CEQA; (3) Adopt a MMRP; (4) Find the Project consistent with the General Plan; (5) Approve Use Permit Major Modification No. P19-00038-MOD subject to the recommended Conditions of Approval; and (6) Adopt an Ordinance approving a Development Agreement between Napa County and JFI III; and

WHEREAS, on March [REDACTED], 2026, notice of a public hearing on the Planning Commission's recommendations to the Board of Supervisors was mailed, published and posted in accordance County Code Section 18.136.040, and Government Code Sections 65867, 65090 and 65091;

WHEREAS, on April [REDACTED], 2026, the Board of Supervisors held a duly noticed public hearing regarding the Project and the Planning Commission's recommendations. The Board also considered all written and verbal testimony submitted; and

WHEREAS the Board of Supervisors now desire to adopt this Resolution and by separate action adopt an ordinance approving the Development Agreement between Napa County and JFI III.

NOW, THEREFORE, BE IT RESOLVED by the Napa County Board of Supervisors hereby finds as follows:

SECTION 1. **Recitals.**

The Board of Supervisors hereby finds that the foregoing recitals are true and correct.

SECTION 2. **Purpose of the Findings.**

The purpose of these Findings is to satisfy the requirements of Public Resources Code Section 21000, et seq., and Sections 15091, 15092, and 15097 of the CEQA Guidelines, 14 Cal. Code Regs. Sections 15000, et seq., associated with adoption of the Project. These Findings provide the written analysis and conclusions of the Board regarding the Project. They are divided into general sections. Each of these sections is further divided into subsections, each of which addresses a particular impact topic and/or requirement of law. At times, these Findings refer to materials in the administrative record, which are readily available for review in the PBES Department.

SECTION 3. **Project Objectives.**

The Project Applicant and the County have each developed objectives for the Project as follows:

The Project Applicant:

1. Develop hotel, retail, and restaurant uses on an infill project site consistent with the Commercial Limited zoning and General Plan Policy AG/LU-45;
2. Generate positive fiscal impacts for Napa County through redevelopment and use of the Project site;
3. Develop land uses that do not exceed the intensities permitted by the historical/existing site entitlements;
4. Provide on-site affordable housing in existing residences;
5. Develop a project that integrates the Vine Trail to allow project patrons alternative transportation and reduce vehicle miles travelled; and
6. Implement a sustainable project that meets or exceeds CalGreen energy standards and maximizes reuse of water supply and minimizes water demand.

The County objectives:

1. Ensure development of the Project site consistent with policies in the General Plan that support the economic viability of agriculture and supporting industries to ensure the

preservation of agricultural lands and envision additional commercial uses only within the portions of parcels zoned for commercial use.

2. Demonstrate leadership in sustainable development by constructing a project intended to reduce the consumption of energy and groundwater, that is designed and constructed to a minimum of LEED Gold standard.
3. Reduces wildfire risk and promotes long-term fire resilience by contributing towards fuel modification measures that support the County's fire resilience goals.
4. Ensure development of the Project site supports the maintenance, preservation, improvement, and development of housing in the unincorporated County consistent with State-mandated housing requirements, and balances job creation and the availability of affordable housing in the County.

SECTION 4. Findings are Determinative.

The Board of Supervisors recognizes that there may be differences in and among the different sources of information and opinions offered in the documents and testimony that make up the Final EIR (February 2026) and the administrative record; that experts disagree; and that the Board of Supervisors must base its decision and these Findings on the substantial evidence in the record that it finds most compelling. Therefore, by these Findings, the Board of Supervisors ratifies the Final EIR (February 2026) and resolves that these Findings shall control and are determinative of the potentially significant impacts of the Project.

SECTION 5. Certification of FEIR:

The Board of Supervisors:

1. Finds that the Final EIR has been completed in compliance with CEQA; and
2. Finds that the Final EIR reflects the Board of Supervisors' independent judgment and analysis; and
3. Finds that the Final EIR was presented to the Board of Supervisors, and the Board has reviewed and considered the information contained in the Final EIR prior to taking an action on the Inn at the Abbey Hotel Project (Major Modification No. P19-00038-MOD); and
4. Certifies the Final EIR.

SECTION 6. Findings Associated with Less Than Significant Impacts Without Need for Imposition of Mitigation.

A. The Board of Supervisors has reviewed and considered the information in the Draft EIR and the Final EIR (February 2026), addressing environmental effects, mitigation measures, and alternatives. The Board, relying on the facts and analysis in the DEIR, and Final EIR (February 2026), which were presented to the Board and reviewed and considered prior to any approvals, concurs with the conclusions of the DEIR and Final EIR (February 2026) regarding the less than significant environmental effects.

B. The following impacts from implementation of the Inn at the Abbey Hotel Project are less than significant: aesthetics; agriculture and forestry resources, energy; geology and soils; hydrology and water quality; land use and planning; population and housing; public services and recreation; and wildfire.

SECTION 7. Findings Associated with Impacts and Mitigation Measures.

According to Public Resources Code Section 21081 and CEQA Guidelines Section 15091, no public agency shall approve or carry out a project for which an environmental impact report has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:

1. Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment.
2. Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.
3. Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.

CEQA does not require that a lead agency adopt every mitigation measure recommended in an EIR. However, when an agency rejects any of the mitigation measures identified in the EIR for a significant impact, it must make specific findings that the rejected measures are infeasible. These findings must show the agency’s reasons for rejecting the mitigation measures that the EIR recommends. An agency may reject a mitigation measure recommended in an EIR if it finds that it would be infeasible to implement the measure because of “specific legal, economic, social, technological, or other considerations, including the provision of employment opportunities for highly trained workers.” (Public Resources Code Section 21081(a)(3); 14 CCR Section 15091 (a)(3).) None of the mitigation measures in the Final EIR (October 2015) have been rejected as infeasible or are within the jurisdiction and responsibility of another public agency.

A. AIR QUALITY

1. Impact AIR-1: Construction of the Project has the potential to create temporary air quality impacts through emissions of criteria air pollutants, primarily associated with the use of heavy-duty construction equipment, construction workers’ vehicle trips, and truck hauling trips. In addition, fugitive ROG emissions would be emitted during construction, predominantly from application of architectural coatings and ROG off-gassing emissions associated with asphalt paving. As shown in Table 4.3-4 of the DEIR, emissions of all analyzed criteria air pollutants during all construction years would be well below the BAAQMD construction thresholds. BAAQMD considers construction-related fugitive dust impacts of projects to be less than significant if a suite of recommended dust-control measures is implemented (BAAQMD, 2023a).

Without implementation of these measures, fugitive dust impacts from construction activities would be considered potentially significant.

Mitigation Measure AIR-1 (Construction-Related Fugitive Dust Minimization):

During Project construction, the construction contractor shall comply with the BAAQMD's current basic and enhanced best management practices for reducing construction emissions of fugitive PM₁₀ and PM_{2.5}. At a minimum, the construction contractor shall comply with the following measures:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- All haul trucks transporting soil, sand, or other loose material offsite shall be covered.
- All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All vehicle speeds on unpaved roads shall be limited to 15 mph.
- 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.
- All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.
- All trucks and equipment, including their tires, shall be washed off prior to leaving the site.
- Unpaved roads providing access to sites located 100 feet or further from a paved road shall be treated with a 6- to 12- inch layer of compacted wood chips, mulch or gravel.
- Publicly visible signs shall be posted with the telephone number and name of the person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The BAAQMD Air Pollution Complaints number shall also be included on the publicly visible signs to ensure compliance with applicable regulations.
- Limit the simultaneous occurrence of excavation, grading, and ground-disturbing construction activities.
- Prior to disturbance install wind breaks (e.g., trees, fences) on the windward side(s) of actively disturbed areas of construction. Wind breaks should have at maximum 50 percent air porosity.
- Plant vegetative ground cover (e.g., fast-germinating native grass seed) in disturbed areas as soon as possible and watered appropriately until vegetation is established.
- Install sandbags or other erosion control measures to prevent silt runoff to public roadways from sites with a slope greater than one percent.
- Minimize the amount of excavated material or waste materials stored at the site.

- Hydroseed or apply non-toxic soil stabilizers to construction areas, including previously graded areas, that are inactive for 10 or more calendar days.

Finding: Pursuant to Public Resources Code Section 21081 (a) and CEQA Guidelines Section 15091 (a), the Board hereby finds that changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effects to a less than significant level.

Rationale: Based on the Final EIR (February 2026) and the administrative record, this potential construction related air quality impact is mitigated by adoption of Mitigation Measure AIR-1 found on page 4.3-20 of the DEIR and as COA No.7.4 on IATA's Use Permit Major Modification No. P19-000383-MOD. Implementation of Mitigation Measure AIR-1 would reduce the potential for significant construction-related fugitive dust impacts by complying with the BAAQMD's current basic and enhanced best management practices for reducing construction emissions of fugitive PM₁₀ and PM_{2.5}. As a result of mitigation, this impact would be reduced to a less than significant level.

B. BIOLOGICAL RESOURCES

1. Impact BIO-1: The study area includes suitable habitat for the following species and is within the species' known range: Napa false indigo, narrow-anthered brodiaea, Colusa layia, Napa bluecurls, white-tailed kite, purple martin, pallid bat, and Townsend's big-eared bat, which are considered to have at least a moderate potential to occur in the study area.

Special-status plants. Special-status plants have not been identified on or adjacent to the Project site and are not expected to be encountered during Project construction or operations. Local occurrences of such species are associated with mountainous woodland habitat located approximately 0.5 miles west of the Project site, and much of the site is developed or has been historically disturbed. However, it is possible that one of four locally-occurring rare plants could be encountered within oak woodland habitat in the North Parcel or south of developed areas on the South Parcel. Construction-related direct impacts to special-status plant species, if present, such as Napa false indigo, narrow-anthered brodiaea, Colusa layia, and Napa bluecurls could result from ground disturbance, including removal of trees and other vegetation and staging of equipment, within undisturbed, vegetated portions of the Project area. While construction is expected to primarily impact previously developed or otherwise disturbed areas, if activities result in removal of special-status plant species, this impact would be potentially significant. Operational activities are not expected to impact special-status plants as the existing site uses would not significantly change.

Mitigation Measures:

Mitigation Measure BIO-1a (Protocol Level Surveys for Special-Status Plants):

Prior to earth disturbing activities within oak woodland habitat in the North Parcel and undeveloped lands on the South Parcel, a qualified botanist shall conduct a rare plant survey of the construction disturbance area within the appropriate bloom period for Napa false indigo, narrow-anthered brodiaea, Colusa layia, and Napa bluecurls. Surveys and reporting shall be conducted

following the current California Department of Fish and Wildlife (CDFW) protocol. In the absence of rare plants, no further mitigation is needed. If special-status plant species are found and plants cannot be avoided, then Measure BIO-1b shall be implemented to avoid, minimize and compensate for rare plant impacts.

Mitigation Measure BIO-1b (Avoidance, Minimization, and Compensation for Impacts to Special-status Plants): If special-status plant populations are identified and cannot be avoided, the Project Applicant shall confer with CDFW to coordinate relocation of special-status plants. In advance of plant relocation, the applicant shall prepare a Mitigation and Monitoring Plan (Plan) that describes the methods and specifies the success criteria and monitoring period for transplanted plants and related long-term protection and management of transplanted or planted individuals. The Plan shall be subject to review and approval by the PBES Department prior to the initiation of any Project activities that will impact the special-status plant(s). The Plan shall include the following provisions:

- a) Special-status plants that would be impacted by the Project shall be relocated within suitable habitat on site. This can be done either through salvage and transplanting on-site or by collection and propagation of seeds or other vegetative material for on-site planting. Plant relocation shall be performed under the supervision of a qualified biologist.
- b) The Plan shall detail relocation methods or appropriate replacement ratios and methods for implementation, success criteria, monitoring and reporting protocols, and contingency measures that shall be implemented if the initial mitigation fails. The Plan shall be developed in coordination with the PBES Department and appropriate agencies (depending upon plant listing status) prior to the start of earth disturbing activities. At a minimum, success criteria shall require mitigation areas to provide equal or better habitat and populations than the impacted area (e.g., at least 75% survival of transplanted, planted, or seeded individuals; minimal weeds within the planting area, and plants in fair or better condition at the completion of the restoration effort). Where appropriate, depending upon the target species, restoration efforts shall require maintenance of the restored areas, for example through irrigation, weeding, and replacement plantings when annual performance thresholds are not met.
- c) If compensatory restoration or reintroduction of plants or seed is implemented, the Project Applicant shall maintain and monitor the relocation sites and/or restored areas for five (5) years following the completion of construction and restoration activities. The applicant shall submit annual monitoring reports to the PBES Department, at the completion of restoration. Monitoring reports shall include photo-documentation, planting specifications, a site layout map, descriptions of materials used, and justification for any deviations from the Plan. Success criteria for restored areas shall be identified in the Plan.

Nesting Birds. Construction-related direct impacts on nesting birds protected by the Migratory Bird Treaty Act could result from the removal of trees and vegetation and/or demolition of buildings while an active bird nest is present. In addition, earth moving, operation of heavy equipment, and increased human presence could result in noise, vibration, and visual disturbance. These conditions could indirectly result in nest failure (disturbance, avoidance, or

abandonment that leads to unsuccessful reproduction) or could cause flight behavior that would expose an adult or its young to predators. These activities could cause birds that have established a nest before the start of construction to change their behavior or even abandon an active nest, putting their eggs and nestlings at risk for mortality. Operational activities are not expected to impact nesting birds as the existing site uses would not significantly change. Because of the potential for nest failure during the construction activities described above, this impact would be potentially significant. Generally, nest failure would be a violation of CFGC Sections 3503–3513. Impacts during the non-breeding season generally are not considered significant, primarily because of the birds’ mobility and ability to access other comparable foraging habitat in the region.

Mitigation Measure BIO-2 (Preconstruction Survey for Breeding Birds): For earth-disturbing activities commencing between February 1 and August 31, (which coincides with the grading season of April 1 through October 15 – NCC Section 18.108.070.L, and bird breeding and nesting seasons), a qualified biologist (defined as knowledgeable and experienced in the biology and natural history of local avian resources with potential to occur at the Project site and experienced with conducting pre-construction nesting bird and raptor surveys as determined by the Napa County Planning Division) shall conduct pre-construction surveys for nesting birds and raptors, within all suitable habitat on the Project site, and all suitable nesting habitat within 500 feet of the Project site. The preconstruction survey shall be conducted no earlier than seven (7) days prior to when vegetation removal and ground disturbing activities are to commence. Should ground disturbance commence later than seven (7) days from the survey date, or if there is a lapse in Project activities of seven (7) days or more during the nesting season surveys shall be repeated. A copy of the survey report shall be provided to the Napa County Planning Division and the CDFW prior to commencement of work.

In the event that the survey finds active nests, the qualified biologist shall determine adequate no-disturbance buffer distances from all active nests based on the species and in consultation with the County Planning Division and the U.S. Fish and Wildlife Service (USFWS) and/or CDFW prior to initiation of Project activities.

All active nests shall be monitored during construction hours by a qualified biologist for the first week during Project activities to ensure the established buffer distances are adequate to avoid disturbances to the nest. If the qualified biologist observes bird behavior that may indicate nest disturbance, the qualified biologist shall have the authority to immediately cease Project activities. In this event, the qualified biologist shall consult with CDFW regarding larger buffer distances, and buffer zones shall be refenced accordingly, prior to resuming Project activities. If larger buffer distances cannot be established, Project activities shall be delayed until the nest is no longer active (i.e. the young have fledged the nest and can feed independently, or the nest fails due to natural causes), as determined by the qualified biologist.

Alternative methods aimed at flushing out nesting birds prior to pre-construction surveys, whether physical (i.e., removing or disturbing nests by physically disturbing trees with construction equipment), audible (i.e., utilizing sirens or bird cannons), or chemical (i.e., spraying nesting birds or their habitats) would be considered an impact to nesting birds and are prohibited. Any act associated with flushing birds from Project areas shall undergo consultation

with the Napa County Planning Division, USFWS and/or CDFW prior to any activity that could disturb nesting birds.

Roosting Bats. Operational activities are not expected to impact roosting bats as the existing site uses would not significantly change. The Project could impact special-status bats if they are present in buildings that would be demolished or in mature trees that would be removed or pruned to accommodate Project construction. Special-status bat species that have the potential to occur in the Project area include pallid bat and Townsend's big-eared bat. If tree removal or building demolition were to occur during periods of winter torpor or maternity roosting, any bats present would likely not survive the disturbance. The impact of these disturbances would be potentially significant.

Mitigation Measure BIO-3 (Roosting Bat Surveys): In advance of tree removal and building demolition, a qualified biologist shall conduct a pre-construction survey for special-status bats to characterize potential bat habitat and identify active roost sites within 100 feet of the Project site. Should potential roosting habitat or active bat roosts be found in trees and/or structures to be removed under the Project or within a 100-foot buffer zone from these areas, the following measures shall be implemented:

- At least 30 days prior to removal of trees and structures with active roosts shall occur when bats are active, between March 1 and April 15 inclusive and between September 15 and October 15 inclusive. To the extent feasible, removal shall occur outside of bat maternity roosting season (April 15 to August 31 inclusive) and outside of the months of winter torpor (October 16 to February 28 inclusive).
- If removing trees and structures during the periods when bats are active is not feasible and active bat roosts being used for maternity or hibernation purposes are found on or in the immediate vicinity of the Project area where tree and structure removal is planned, a 100-foot no-disturbance buffer shall be established around these roost sites until the qualified biologist has determined that they are no longer active.
- The qualified biologist shall be present during removal of trees and structures when active or potentially active bat roosts not being used for maternity or hibernation purposes are present. Trees and structures with active roosts shall be removed only when no rain is occurring and rain is not forecast to occur for 3 days following removal of the roost, and when daytime temperatures are at least 50 degrees Fahrenheit.
- Removal of trees with active or potentially active roost sites not being used for maternity or hibernation purposes shall follow a two-step removal process:
 - (1) On the first day of tree removal and under the supervision of the qualified biologist, branches and limbs that do not contain cavities or fissures in which bats could roost shall be cut only using chainsaws or non-motorized equipment. Removal of the canopy makes the tree unappealing for bats to return that evening to roost.

- (2) On the following day and under the supervision of the qualified biologist, after confirmation that bats have not returned, the remainder of the tree may be removed, using either chain saws or other equipment (e.g., excavator or backhoe).

Structures that contain or are suspected to contain active bat roosts, but that are not being used for maternity or hibernation purposes, shall be dismantled under the supervision of the qualified biologist in the evening, after bats have emerged from the roost to forage. The structures shall be partially dismantled to substantially change roost conditions, causing the bats to abandon and not return to the roost.

Finding: Pursuant to Public Resources Code Section 21081 (a) and CEQA Guidelines Section 15091 (a), the Board hereby finds that changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effects to a less than significant level.

Rationale: Based on the Final EIR (February 2026) and the administrative record, potential biological impacts to special-status species, nesting birds and roosting bats are mitigated by adoption of Mitigation Measures BIO-1a, BIO-1b, BIO-2 and BIO-3 found on pages 4.4-17 to 4.4-19 of the DEIR, page 4-7 of the FEIR and as COA Nos. 6.13 (a), (b), (c) and (d) on IATA's Use Permit Major Modification No. P19-000383-MOD.

Implementation of Mitigation Measure BIO-1a and BIO-1b would be consistent with General Plan Policies CON-13 and CON-16 and would reduce the potential impact to special-status plant species to a less-than-significant level because they would require surveys to identify the presence and location of any special-status plants. If special-status plant species are found within the Project area they would be avoided wherever possible, for example, by minimizing the construction footprint around rare plants. For rare plants that cannot be avoided, a mitigation and monitoring plan would be implemented that describes the methods and specifies success criteria and monitoring criteria for transplanted plants, and related long-term protection and management of transplanted plants.

Implementation of Mitigation Measure BIO-2 would be consistent with General Plan Policies CON-13 and CON-16 and would reduce the potential impact to nesting special-status and other migratory bird species to a less-than-significant level. Mitigation Measure BIO-2 would ensure that either vegetation removal and demolition would occur outside of the nesting season, or that appropriate buffers are established around nests until young have fledged to avoid loss of eggs and young should vegetation removal and demolition occur during the nesting season,

Implementation of Mitigation Measure BIO-3 would be consistent with General Plan Policies CON-13 and CON-16 and would reduce the potential impact to special-status bat species to a less-than-significant level because it would ensure that bats are absent from potential roost sites before demolition or tree removal.

2. Impact BIO-2: General Plan Conservation Element Policy CON-24 lists trees and land cover types (primarily oak species and oak woodlands) that the County desires to retain. A tree removal plan and landscape plan have been prepared for the Project (Figure 3-21 and 3-

22). The Project would retain many of the existing trees on the Project site but would require removal of approximately 97 trees, including 73 trees on the North Parcel and 24 trees on the South Parcel. The trees to be removed are mainly concentrated along the eastern side of the North Parcel (along SR 29) where the new North Hotel Building would be constructed. The majority of trees proposed for removal are non-native ornamental trees. Several oak trees near the existing Stone Building are also proposed for removal. While these trees are not within the study areas identified as oak woodland habitat, they may be remnant trees from historical oak woodlands.

General Plan Policy CON-24 requires that projects provide replacement of lost oak woodlands or preservation of like habitat at a minimum 2:1 ratio when retention of existing vegetation is found to be infeasible. Removal of oak species limited in distribution are also to be avoided to the maximum extent feasible. Within the Agricultural Watershed (AW) zoning district, the Napa County Conservation Regulations (Chapter 18.108) require replacement of lost oak woodlands or permanent preservation of like habitat at a minimum 3:1 ratio when retention of existing vegetation is found to be infeasible. The Project would not remove oak trees within the AW zoning district. Therefore, the County's minimum 2:1 ratio would apply to any oak trees removed by the Project. Removal of oak trees would be potentially significant.

Mitigation Measure BIO-4 (Mitigate for Oak Tree Removal): The Project Applicant shall mitigate impacts to oak trees by mitigating for removal of oak trees at a minimum 2:1 ratio either by replacing removed oak trees or permanent preservation of comparable habitat.

Finding: Pursuant to Public Resources Code Section 21081 (a) and CEQA Guidelines Section 15091 (a), the Board hereby finds that changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effects to a less than significant level.

Rationale: Based on the Final EIR (February 2026) and the administrative record, this potential biological impact is mitigated by adoption of Mitigation Measure BIO-4 found on page 4.4-20 of the DEIR as COA No. 6.13 (e) on IATA's Use Permit Major Modification No. P19-000383-MOD. While General Plan Policy CON-24 does not apply to individual oaks removed from commercially zoned lands, the Project Applicant has offered to apply Mitigation Measure BIO-4 to individual oaks removed on CL zoned lands as part of the Project. Mitigation Measure BIO-4 would be consistent with General Plan Policy CON-24 and would reduce the potential impact to oak trees to a less-than-significant level by requiring replacement or preservation of oak trees at a minimum 2:1 ratio for oak tree removal.

C. CULTURAL RESOURCES

1. **Impact CUL-2:** Based on the results of the records search, there are two pre-contact archaeological resources recorded in the vicinity of the Project site. One of these resources, site P-28-000952, was evaluated and determined to be not eligible for listing in the National and California Registers, and as such, would not qualify as a historical resource or unique archaeological resource. No further consideration of site P-28-000952 is necessary. Based on the results of the surface and subsurface survey completed for the Project, site P-28-000389 is not

located within areas of proposed ground disturbance for the Project. Despite the negative findings of the investigation, the unanticipated discovery of significant archaeological resources, either associated with site P-28-000389 or a newly identified resource, cannot be entirely discounted. Disturbance of potentially significant archaeological resources during ground disturbing activities associated with the Project could result in a significant impact.

Mitigation Measures:

Mitigation Measure CUL-1a (Cultural Resources Sensitivity Training Program): A cultural resources sensitivity training program shall be implemented for the Project. Prior to any earth disturbing activity, all construction personnel shall be required to view a Project-specific cultural resources awareness training presentation via recorded virtual presentation (PowerPoint) or in-person and on-site presentation provided by a Secretary of the Interior-qualified archaeologist. A Native American representative shall be invited to provide input and guidance on the training materials. The training shall include a description of the sensitivity of the Project vicinity and information on how to identify the types of resources that may be encountered. The training shall also include the proper procedures to be enacted in the event of an inadvertent discovery of archaeological resources or human remains, confidentiality of discoveries, and safety precautions to be taken when working with cultural resources monitors. Napa County shall require that construction personnel view or attend the training presentation and retain documentation demonstrating attendance.

Mitigation Measure CUL-1b: Archaeological and Native American Monitoring. Monitoring will be required according to the Cultural Resources Monitoring Plan (CRMP) prepared as part of the cultural resources survey and analysis completed for the Project (Mattes, 2024). The CRMP is on-file with Napa County and the Project Applicant. An archaeological monitor and a Native American monitor shall be required during ground disturbing activities within 100 feet of pre-contact site P-28-000389. During the course of the monitoring, the archaeologist and Native American monitor may adjust the frequency—from continuous to intermittent or vice versa—of the monitoring based on the conditions and professional judgment regarding the potential to impact resources.

Mitigation Measure CUL-1c (Protocols for Inadvertent Discovery of Cultural Materials): If pre-contact or historic-era cultural materials are encountered by construction personnel during Project implementation, all construction activities within 100 feet shall halt until a Secretary of the Interior-qualified archaeologist can assess the significance of the find. If found within Caltrans right-of-way, the Caltrans Office of Cultural Resource Studies (OCRS) shall be contacted, and a Caltrans staff archeologist will evaluate the find. Pre-contact archaeological materials might include obsidian and chert flaked-stone tools (e.g., projectile points, knives, scrapers) or toolmaking debris; culturally darkened soil (midden) containing heat-affected rocks, artifacts, or shellfish remains; stone milling equipment (e.g., mortars, pestles, hand stones, or milling slabs); and battered stone tools, such as hammer stones and pitted stones. Historic-era materials might include stone, concrete, or adobe footings and walls; filled wells or privies; and deposits of metal, glass, and/or ceramic refuse.

If it is determined, based on recommendations from a qualified archaeologist and affiliated Native American tribal representatives (if the resource is Native American related), that the resource may qualify as a historical resource or unique archaeological resource, the resource shall be avoided, if feasible.

If avoidance is not feasible, the Project Applicant and Napa County shall work with a qualified archaeologist and affiliated Native American tribal representatives (if the resource is Native American-related) to determine treatment measures to avoid, minimize, or mitigate any potential adverse effects to the resource. This shall include documentation of the resource and may include data recovery, if deemed appropriate, or other actions such as treating the resource with culturally appropriate dignity and protecting the cultural character and integrity of the resource. Within Caltrans right-of-way, Caltrans shall review and potential data recovery plans.

Finding: Pursuant to Public Resources Code Section 21081 (a) and CEQA Guidelines Section 15091 (a), the Board hereby finds that changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effects to a less than significant level.

Rationale: Based on the Final EIR (February 2026) and the administrative record, this potential cultural resources impact is mitigated by adoption of Mitigation Measures CUL-1a, CUL-1b and CUL-1c found on pages 4.5-21 to 4.5-22 of the DEIR, page 4-10 of the FEIR and as COA Nos. 6.13 (f), 7.4 (b) and (c) on IATA's Use Permit Major Modification No. P19-000383-MOD. Implementation of Mitigation Measures CUL-1a, CUL-1b, and CUL-1c, would reduce potential impacts to archaeological resources to a less-than-significant level by requiring a cultural resources sensitivity training prior to ground disturbing activity associated with the Project; archaeological and Native American monitoring during ground disturbing activities according to a Cultural Resources Monitoring Plan; and protocol for the inadvertent discovery of cultural materials. Therefore, with implementation of Mitigation Measures CUL-1a, CUL-1b, and CUL-1c, Project impacts would be less than significant.

2. Impact CUL-3: Based on the surface and subsurface survey results, nearby site distribution, and previous disturbance, there appears to be a low potential for the discovery of human remains during Project implementation. Despite the negative findings, the unanticipated discovery of human remains cannot be entirely discounted. Disturbance of human remains during ground disturbing activities associated with the Project could result in a significant impact.

Mitigation Measure CUL-2 (Inadvertent Discovery of Human Remains): If potential human remains are encountered, all work shall halt within 100 feet of the find and Napa County shall be contacted by on-site personnel. Napa County shall contact the Napa County coroner in accordance with Public Resources Code Section 5097.98 and Health and Safety Code Section 7050.5. If the coroner determines the remains are Native American, the coroner shall contact the Native American Heritage Board. As provided in Public Resources Code Section 5097.98, the Board shall identify the person or persons believed most likely to be descended from the deceased Native American. The most likely descendant shall make recommendations for means of treating, with appropriate dignity, the human remains, and any associated grave goods as provided in Public Resources Code Section 5097.98.

Finding: Pursuant to Public Resources Code Section 21081 (a) and CEQA Guidelines Section 15091 (a), the Board hereby finds that changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effects to a less than significant level.

Rationale: Based on the Final EIR (February 2026) and the administrative record, this potential cultural resources impact is mitigated by adoption of Mitigation Measure CUL-2 found on page 4.5-22 of the DEIR as COA No. 7.4 (d) on IATA's Use Permit Major Modification No. P19-000383-MOD. Implementation of Mitigation Measure CUL-2, would reduce potential impacts to human remains to a less-than-significant level by ensuring that regulations are followed in the event of a discovery, and if the remains are determined to be Native American, the Native American Heritage Board is contacted to appoint a most likely descendant. Therefore, with implementation of Mitigation Measure CUL-2, Project impacts would be less than significant

3. Impact CUL-2.CU: Cumulative development in Napa County and in portions of the region identified as the territory of the local Native American community or the area of historic-era use and occupation in Napa County could result in significant cumulative impacts to historic-era and pre-contact Native American archaeological resources and/or human remains. This includes commercial and infrastructural development and maintenance projects slated for implementation within 0.5-mile of the Project site, as summarized in Table 4.0-1 of the DEIR. While no known archaeological resources are located within the Project's areas of direct impact, as evident by archival research and surface and subsurface field investigations, the potential exists for unknown archaeological resources and/or human remains. Each individual project is subject to review under CEQA and therefore would be required to avoid, minimize, and compensate for any significant impacts on sensitive cultural resources, such that the cumulative impact would be reduced, though not completely eliminated. Because not all such impacts from these other projects have been or can be reduced with certainty to less-than-significant levels, the loss of any archaeological resources and/or human remains would result in a potentially significant cumulative impact.

As discussed above, there is low potential for the discovery of cultural materials, including human remains, during project implementation. However, despite the low potential inferred through archival research and field investigation, ground disturbing activity within the Project site has the potential to encounter previously unrecorded archaeological resources and/or human remains, and construction-associated grading and excavation could destroy these resources. As a result, the Project could result in a considerable contribution to the cumulative loss of archaeological resources and/or human remains, and this cumulative impact would be potentially significant.

Mitigation Measures: Mitigation Measures CUL-1a, CUL-1b, CUL-1c and CUL-2 incorporated here by reference.

Finding: Pursuant to Public Resources Code Section 21081 (a) and CEQA Guidelines Section 15091 (a), the Board hereby finds that changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effects to a less than significant level.

Rationale: Based on the Final EIR (February 2026) and the administrative record, this potential cumulative impact on cultural resources is mitigated by adoption of Mitigation Measures CUL-1a, CUL-1b, CUL-1c and CUL-2 found on pages 4.5-21 to 4.5-22 of the DEIR, page 4-10 of the FEIR and as COA Nos. 6.13 (f), 7.4 (b), (c) and (d) on IATA's Use Permit Major Modification No. P19-000383-MOD. Implementation of Mitigation Measures CUL-1a, CUL-1b, CUL-1c, and CUL-2 would effectively avoid damage to or loss of archaeological resources and/or human remains, and little to no residual impact would remain after mitigation. With implementation of this mitigation measure, the contribution of the Project to this cumulative impact would be less than considerable, and this impact would be reduced to a less-than-significant level.

D. GREENHOUSE GAS EMISSIONS

1. Impact GHG-1: GHG emissions from the Project would result in both direct and indirect emissions from construction and operational activities. Direct GHG emissions would be generated during construction and would include emissions from the combustion of fuel (e.g., gasoline and diesel) in construction equipment and vehicles. Project construction was modeled to begin in spring of 2024 and occur over approximately 36 months. Table 4.7-3 of the DEIR (page summarizes the GHG emissions by construction year for the Project. Table 4.7-4 of the DEIR presents the annual operational GHG emissions for the Project for the modeled first operational year of 2028. Upon completion of construction, direct GHG emissions would be generated from area sources (such as landscaping equipment, maintenance-related architectural coatings, natural gas combustion for space and water heating, and use of consumer products) and on-road motor vehicle trips generated by the Project that would include both passenger vehicle trips from employees and hotel guests as well as heavy-duty delivery truck trips. Indirect operational GHG emissions would be generated from electricity use associated with building energy use along with water and wastewater treatment and conveyance and disposal of solid waste generated.

For the evaluation of a project's GHG impacts, BAAQMD's recommended GHG thresholds address the two main direct sources of GHG emissions in land use development projects: building energy use and motor vehicle trips. Each of the BAAQMD thresholds and the Project's consistency are discussed below.

Compliance with No Natural Gas Requirement. Though the 2022 Energy Code stops short of explicitly banning natural gas in new construction, many jurisdictions across California have moved to adopt ordinances requiring all-electric buildings and banning natural gas in new construction as part of their efforts to meet the State's GHG reduction goals for 2030 and beyond. Napa County has not implemented an ordinance prohibiting natural gas in new construction. As the Project is not proposed as an all-electric project with no natural gas appliances or infrastructure, it would be inconsistent with the BAAQMD's first GHG threshold.

Compliance with Tier 2 EV Requirements in CALGreen. In addition to the mandatory requirements in the 2022 California Green Building Standards Code (“CALGreen”, Title 24, Part 11), the 2022 CALGreen Code encourages local jurisdictions to raise the sustainable goals by publishing two “voluntary” tiers of additional requirements, referred to as Tier 1 and Tier 2. Tier 1 adds additional requirements beyond the mandatory measures. Tier 2 further increases the requirements. The CALGreen tiers are only mandatory where local ordinances have specifically adopted them. Napa County has not adopted ordinances requiring the implementation of voluntary Tier 1 and Tier 2 standards beyond the mandatory CALGreen requirements. Further, while the Project Applicant proposes to include installation of 150 percent of the number of electric vehicle charging stations required by the building code, the Project does not specify the level of charging infrastructure proposed as part of the Project design. Therefore, the Project would not comply with the BAAQMD’s third threshold requiring compliance with EV requirements in the most recently adopted version of CALGreen Tier 2. Mitigation Measure GHG-1b: Electric Vehicle Charging Infrastructure Consistent with CALGreen Tier 2, would require EV charging infrastructure consistent with CALGreen Tier 2.

Consistency with SB 743 VMT Reduction Target of 15 percent below the regional average. BAAQMD requires projects to meet locally adopted VMT targets consistent with SB 743. Per the County’s TIS Guidelines, the number of project trips must be reduced to a level that is 15 percent below the unmitigated trip generation using ITE rates to meet the VMT target. The Project is estimated to generate 645 new trips per day. To reach the significance threshold, the project would need to reduce its unmitigated trip generation by 97 trips per day to 548 or fewer daily trips. Without this reduction, the Project would not be consistent with the BAAQMD’s

Mitigation Measures:

Mitigation Measure GHG-1a (All-Electric Development with No Natural Gas Infrastructure): New development on the Project site shall be designed and developed as all-electric development with no natural gas infrastructure.

Mitigation Measure GHG-1b (Electric Vehicle Charging Infrastructure Consistent with CALGreen Tier 2): Consistent with CALGreen 2022 Tier 2 requirements, a minimum of 55 percent of the total 203 parking spaces proposed by the Project shall be electric vehicle (EV) Ready spaces equipped with low power Level 2 EV charging receptacles. In addition, 20 percent of the total number of parking spaces shall be equipped with Level 2 EV chargers with at least 50 percent of the required EV chargers equipped with J1772 connectors.

Mitigation Measure TRA-1 (Transportation Demand Management Program): Prior to issuance of building permits, the Project Applicant shall implement a Transportation Demand Management (TDM) Program for the Project and shall submit the TDM Program to the County for review and approval by the Napa County Department of Public Works. The TDM Program shall identify trip reduction strategies as well as mechanisms for funding and overseeing the delivery of trip reduction programs and strategies. The TDM Program shall be designed to achieve a 15 percent reduction compared to the unmitigated VMT estimated for the Project. The TDM Program shall contain provision of on-site employee housing, visitor trip reduction measures, and an employee TDM Program as outlined below:

1. The existing six on-site housing units shall be deed restricted affordable for employees for the life of the Project.
2. As part of the visitor trip reduction measures, the Project Applicant shall provide at least 10 bicycles on-site as part of the guest amenities and provide maps illustrating bicycle routes to local tasting rooms, restaurants, and other destinations to encourage the use of on-site bicycles. The bicycles shall be kept under good maintenance and replaced as necessary throughout the life of the Project. The TDM Program coordinator for the employee TDM program described below shall include on-site bicycle maintenance in the reporting requirements for the employee TDM Program.
3. The employee TDM program shall consist of the following:
 - **Education, Outreach, and Marketing:** The Project Applicant shall identify a TDM program coordinator. The presence of a staff person dedicated part-time to overseeing and managing the TDM Program will be helpful in ensuring the ongoing success of these programs. This would not be a distinct position, but instead is intended to be a role that is integrated into the duties of the on-site manager. The duties shall include the following:
 - Create and distribute employee transportation information welcome packets
 - Maintain and update a bulletin board or other physical source of transportation information
 - Distribute Napa Bicycle Coalition maps
 - Monitor bicycle facilities
 - Promote the ride-matching program
 - Market special events such as the Napa Valley Transportation Authority (NVTA) “V-Commute Challenge” program
 - **Carpool Incentives:** The Project Applicant shall provide an incentive of \$50 per month to employees who agree to carpool to work a minimum of 75 percent of the time. In addition, the Project Applicant shall reserve five parking spaces immediately adjacent to the wine production building for use by carpool vehicles only. This program shall be offered to the existing employees as well as new employees of the hotel.
 - **Subsidized Transit Passes:** Employees wishing to use transit to reach the site shall be provided with a monthly pass for Vine Transit free of charge. The Project Applicant shall also install a shelter and bench at the northbound transit stop near the Project site along SR 29.
 - **Guaranteed Ride Home:** Employees shall be provided information about the V-Commute program offered by the NVTA and would be encouraged to register for the service.
 - **Bicycle Trip-end Facilities:** Showers and changing rooms shall be provided on-site to further encourage employees to ride their bicycles to and from work.

The employee TDM Program, shall be available for the first two years of Project operation. After that time, the effectiveness of the program shall be reevaluated and modified, if needed, in coordination with Napa County Public Works Department staff. County staff shall determine future reporting requirements and intervals after the initial two-year TDM Program reevaluation (e.g., TDM Program evaluation every four years), and may enact corrective measures if necessary.

Finding: Pursuant to Public Resources Code Section 21081 (a) and CEQA Guidelines Section 15091 (a), the Board hereby finds that changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effects to a less than significant level.

Rationale: Based on the Final EIR (February 2026) and the administrative record, this potential GHG impact is mitigated by adoption of Mitigation Measures GHG-1a, GHG-1b, and TRA-1 found on page 4.7-30 of the DEIR as COA Nos. 6.13 (g), (h) and (m) and on IATA's Use Permit Major Modification No. P19-000383-MOD.

Mitigation Measure GHG-1a would require the Project's new buildings to be designed and developed as all-electric development with no natural gas infrastructure, which would ensure consistency with the BAAQMD's first GHG threshold. With the implementation of Mitigation Measure GHG-1b, of the 203 parking spaces proposed by the Project, 112 would be provided as EV Ready spaces with low power Level 2 receptacles for EV charging and 41 spaces would be equipped with Level 2 EV chargers. Of the 41 spaces with chargers, 21 would be equipped with J1772 connectors.. This would ensure compliance with current (2022) CALGreen Tier 2 standards (last updated as of July 2024) and consistency with BAAQMD's third GHG threshold. After accounting for reduced vehicle trips due to internal capture, on-site employee housing, and TDM measures under Mitigation Measure TRA-1, project trips would be reduced by 122 trips per day, or 19 percent of the unmitigated project trips. This would exceed the 15 percent reduction requirement to satisfy BAAQMD's fourth threshold. With implementation of Mitigation Measures GHG-1a, GHG-1b, and TRA-1, this impact would be less than significant.

2. Impact GHG-2: CARB 2022 Scoping Plan and AB 1279 Appendix D of the 2022 Scoping Plan identifies the most effective GHG reduction actions at the local level to help ensure that local climate efforts align with the State's climate goals. It identifies three priority areas that address the State's largest sources of emissions that local governments have authority or influence over. These include: transportation electrification, VMT reduction and building decarbonization. By prioritizing climate action in these three priority areas, local governments and entities can address the largest sources of GHGs within their jurisdiction. The Project would, either as part of the design, or by its location in an area served by transit services, or through identified mitigation measures, reduce GHG emissions in all three priority areas.

Plan Bay Area 2050. The Project is consistent with *Plan Bay Area 2050*, which was adopted as the Bay Area's Sustainable Communities Strategy pursuant to SB 375 and includes the regional transportation plan. Implementation of *Plan Bay Area 2050* is expected to reduce transportation-related GHG emissions as a result of transportation and land use changes that support active and shared modes of transportation. With all strategies of the plan implemented,

the Bay Area would meet the State mandate of a 19 percent per-capita emissions reduction by 2035. Policies in *Plan Bay Area 2050* address climate change by reducing GHG emissions pursuant to targets established in consultation with the CARB; specifically, meet or exceed a 19 percent reduction in per-capita emissions from cars and light-duty trucks by 2035 relative to 2005 levels.

Title 24 Standards and CALGreen Code. The Project would be required to comply with the most recent update to Title 24 and CALGreen Codes which aim to achieve energy savings and GHG reductions. The mandatory requirements of the 2022 CALGreen Code, as adopted by the State of California as Title 24, Part 11 of the California Code of Regulations, is adopted and made a part of the Napa County Code by reference and establishes standards for sustainable building construction practices having a positive environmental impact both in terms of GHG emissions and energy use.

Mitigation Measures: Mitigations Measure GHG-1a, GHG-1b and TRA-1 are incorporated here by reference.

Finding: Pursuant to Public Resources Code Section 21081 (a) and CEQA Guidelines Section 15091 (a), the Board hereby finds that changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effects to a less than significant level.

Rationale: Based on the Final EIR (February 2026) and the administrative record, this potential GHG impact is mitigated by adoption of Mitigation Measures GHG-1a, GHG-1b and TRA-1 found on page 4.7-30 of the DEIR as COA Nos. 6.13 (g), (h) and (m) on IATA's Use Permit Major Modification No. P19-000383-MOD. In addition to Project design features, implementation of Mitigation Measures GHG-1a, GHG-1b, and TRA-1 would ensure that the Project does not conflict with applicable plans, policies or regulations adopted for the purpose of reducing the emissions of GHG emissions.

Implementation of Mitigation Measure GHG-1a requires all new construction proposed as part of the Project to be all-electric with no new natural gas infrastructure thereby eliminating direct GHG emissions from the Project and reducing direct GHG emissions from the site. Further, the Project would include on-site solar which would provide part of the Project's electricity demand through renewable zero-carbon electricity. Therefore, the Project would be consistent with the core strategies of the 2022 Scoping Plan.

With implementation of Mitigation Measure GHG-1b, the Project would provide EV charging infrastructure consistent with voluntary CALGreen Tier 2 standards to encourage use of electric vehicles consistent with the 2022 Scoping Plan's goal of transportation electrification. The Project is located in proximity to transit services and would provide facilities to connect with transit facilities and result in a reduction of Project-related VMT.

With implementation of Mitigation Measure TRA-1, the Project will implement a TDM program that will reduce trip generation and associated VMT by 15 percent from unmitigated levels. In addition, proximity to transit and existing and proposed bike lanes would also reduce

vehicle trips generated by the Project. The Project site is located along VINE Route 10 – Up Valley Connector, which provides service between Napa Valley College and Calistoga seven days a week. There are existing Class II bike lanes on Silverado Trail in the Project vicinity and plans to provide a Class III bike route on SR 29 adjacent to the Project site. A segment of the Class I trail (the Vine Trail) parallel to SR 29 runs along the Project site frontage. Therefore, the Project would not conflict with or obstruct implementation of *Plan Bay Area 2050*.

With implementation of Mitigation Measures GHG-1a, GHG-1b, and TRA-1, this impact would be less than significant.

3. Impact GHG-1.CU: Global GHG emissions and global climate change are inherently a cumulative concern that is understood for CEQA purposes to be an existing significant and adverse condition. Accordingly, the significance of GHG emissions in this analysis is determined based on whether such emissions would have a cumulatively considerable impact on global climate change. Because the geographic scope of cumulative impacts related to GHG emissions (i.e., global climate change) is global, this analysis evaluates the Project’s direct and indirect generation of GHG emissions which contribute to this cumulative impact. The California Air Pollution Control Officers’ Association (CAPCOA) considers GHG impacts to be exclusively cumulative impacts, in that no single project could, by itself, result in a substantial change in climate.

Mitigation Measures: Mitigations Measure GHG-1a, GHG-1b and TRA-1 are incorporated here by reference.

Finding: Pursuant to Public Resources Code Section 21081 (a) and CEQA Guidelines Section 15091 (a), the Board hereby finds that changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effects to a less than significant level.

Rationale: Based on the Final EIR (February 2026) and the administrative record, this potential GHG impact is mitigated by adoption of Mitigation Measures GHG-1a, GHG-1b and TRA-1 found on page 4.7-30 of the DEIR as COA Nos. 6.13 (g), (h) and (m) on IATA’s Use Permit Major Modification No. P19-000383-MOD. In addition to Project design features, implementation of Mitigation Measures GHG-1a, GHG-1b, and TRA-1 would ensure that the Project does not conflict with applicable plans, policies or regulations adopted for the purpose of reducing the emissions of GHG emissions.

Implementation of Mitigation Measure GHG-1a requires all new construction proposed as part of the Project to be all-electric with no new natural gas infrastructure thereby eliminating direct GHG emissions from the Project and reducing direct GHG emissions from the site. Further, the Project would include on-site solar which would provide part of the Project’s electricity demand through renewable zero-carbon electricity. Therefore, the Project would be consistent with the core strategies of the 2022 Scoping Plan.

With implementation of Mitigation Measure GHG-1b, the Project would provide EV charging infrastructure consistent with voluntary CALGreen Tier 2 standards to encourage use of

electric vehicles consistent with the 2022 Scoping Plan’s goal of transportation electrification. The Project is located in proximity to transit services and would provide facilities to connect with transit facilities and result in a reduction of Project-related VMT.

With implementation of Mitigation Measure TRA-1, the Project will implement a TDM program that will reduce trip generation and associated VMT by 15 percent from unmitigated levels. In addition, proximity to transit and existing and proposed bike lanes would also reduce vehicle trips generated by the Project. The Project site is located along VINE Route 10 – Up Valley Connector, which provides service between Napa Valley College and Calistoga seven days a week. There are existing Class II bike lanes on Silverado Trail in the Project vicinity and plans to provide a Class III bike route on SR 29 adjacent to the Project site. A segment of the Class I trail (the Vine Trail) parallel to SR 29 runs along the Project site frontage. Therefore, the Project would not conflict with or obstruct implementation of *Plan Bay Area 2050*.

With implementation of Mitigation Measures GHG-1a, GHG-1b, and TRA-1, this cumulative GHG impact would be less than significant.

E. NOISE AND VIBRATION

1. Impact NOI-1 (Construction Noise): Construction activities for the Project would include demolition, site preparation, grading activities, building construction, and paving. Equipment involved with grading and construction at the Project site would include excavators, graders, roller, sweepers, drill rigs, cranes, dumpers, forklifts, generator sets, welders, and trucks for delivering materials and for off-hauling demolition debris. The nearest residential sensitive receptors to the Project site are the residences along Lodi Lane adjacent to the east side of Project site on the South Hotel Complex (South Parcel) located approximately 160 feet east from the center of the Project site. Additionally, the mobile home park (Vista Del Valle) and a residence on SR 29 are located as close as 170 feet west from the center of the North Hotel Building (North Parcel) Project site, respectively.

The noise levels shown in Table 4.10-11 of the DEIR take into account operation of multiple pieces of construction equipment simultaneously for the Leq results. The modeling conservatively assumed that the two noisiest pieces of construction equipment associated with an activity would operate simultaneously for the duration of that activity, modeled as a point source measured from the center of the closest activity area. Construction activities would be conducted in accordance with the provisions of the County’s Municipal Code, which limits noise levels at residential land use shall not exceed 75 dBA between the hours of 7:00 a.m. and 7:00 p.m., and noise levels at agricultural land uses (wineries) shall not exceed 85 dBA between the hours of 7:00 a.m. and 7:00 p.m. Noise levels generated during Project construction activities at the closest sensitive receptors would be below the FTA daytime criteria of 90 dBA Leq for residential uses. However, noise levels from proposed construction activities at the closest receptors could exceed 75 dBA at a residential land use and exceed existing noise levels by as much as 24 dBA, which would exceed the 10 dBA over ambient increase that warrants implementation of mitigation measures. Therefore, construction noise would result in a significant impact.

Rooftop Terrace Noise:

The proposed outdoor terrace space at North Hotel Building would open at 7:00 a.m. and close at 10:00 p.m. The terrace would include a kitchen and seating areas to provide breakfast and serve as a lounge for hotel guests. The maximum occupancy for the entire terrace would be approximately 150 people. Exterior amplified music or speech is not proposed for the rooftop terrace area; however, indoor amplified sound may occur within the interior lounge space.

Napa County Municipal Code Section 8.16.070 establishes daytime standard of 45 dBA L₅₀, which includes the 5 dBA penalty, at the nearby residences and hotel, unless the ambient noise levels exceed the threshold. The predicted noise levels generated at the rooftop terrace would exceed the County's 45 dBA L₅₀ threshold at residences east of the Project site and unmitigated, noise levels would result in a potentially significant impact (Appendix K).

South Parcel Lawn Noise:

An approximately 1,300-square-foot lawn area would be located on the South Parcel with a capacity of 86 people. Amplified music and speech would not occur at this location; however, non-amplified (acoustic) music, films, and raised conversation would be anticipated. This lawn area at the South Hotel Complex, located on the ground-level between Building B (to the west) and Building C (to the east), would provide shielding with surrounding buildings from the north, west, and east. However, the nearest receptor to the south would have direct exposure to the outdoor use area. Napa County Municipal Code Section 8.16.070 establishes a daytime standard of 45 dBA L₅₀, which includes the 5 dBA penalty, that would apply at the nearby residences and hotel, unless the ambient noise levels exceed the threshold. Predicted Project-generated noise levels at the South Parcel lawn would exceed the County's 45 dBA L₅₀ threshold at residences south of the Project site and unmitigated noise levels would result in a potentially significant impact (Appendix K).

Mitigation Measure NOI-1 (Construction Noise Control Measures): The Project Applicant or its contractors shall employ site-specific noise attenuation measures during all construction activities to reduce the generation of construction noise. These measures shall be included in a Noise Control Plan that shall be submitted for review and approval by the Napa County PBES Department prior to the issuance of a demolition and/or grading permit for the Project. Measures specified in the Noise Control Plan and implemented during Project construction shall include, at a minimum, the following noise control strategies:

- Equipment and trucks used for construction shall use the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds).
- Unnecessary idling of internal combustion engines shall be prohibited. The Project Applicant or its contractors shall enforce at a minimum the California Air Resources Board regulations that generally limit idling of commercial motor vehicles (including buses and trucks) within 100 feet of a school or residential area for more than 5 consecutive minutes or periods aggregating more than 5 minutes in any one (1) hour.

- Impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for construction shall be hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. Where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves shall be used where feasible; this could achieve a reduction of 5 dBA. Quieter procedures, such as use of drills rather than impact tools, shall be used where feasible.
- Stationary noise sources shall be located as far from adjacent receptors as possible, and they shall be muffled and enclosed within temporary sheds, incorporate insulation barriers, or include other measures.
- The Project Applicant or its contractors shall construct temporary noise barriers, where feasible, to screen stationary noise-generating equipment. Temporary noise barrier fences would provide a 5 dBA noise reduction if the noise barrier interrupts the line-of-sight between the noise source and receptor and if the barrier is constructed in a manner that eliminates any cracks or gaps.
- Construction staging areas shall be located away from the noise-sensitive receivers, where such locations are available.
- The Project Applicant or its contractors shall erect a temporary noise control blanket barrier along surrounding building facades that face the construction sites. This mitigation would only be necessary if the disturbance coordinator (see last bullet) receives validated noise complaints which are irresolvable by proper scheduling. Noise control blanket barriers can be rented and quickly erected.
- The Project Applicant or its contractors shall locate material stockpiles, as well as maintenance/equipment staging and parking areas, as far as feasible from residential receptors.
- The Project Applicant or its contractors shall control noise from construction workers' radios to a point where they are not audible at existing residences bordering the Project site.
- Route construction-related traffic along major roadways and as far as feasible from sensitive receptors.
- A detailed construction schedule and plan shall be prepared by the contractor for major noise generating construction activities.¹ The construction plan shall identify a procedure for coordination with adjacent residential land uses so that construction activities can be scheduled to minimize noise disturbance. A notice shall be sent to neighbors within 1,000 feet at least 10 business days prior to major noise generating construction activities that includes the construction schedule.
- Designate a “disturbance coordinator” who shall be responsible for responding to any complaints about construction noise. The disturbance coordinator shall determine the

¹ “Major noise generating construction activities” would primarily include demolition and grading which require the use of multiple, large off-road equipment.

cause of the noise complaint (e.g., bad muffler, etc.) and shall require that reasonable measures be implemented to correct the problem. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include it in the notice sent to neighbors regarding the construction schedule.

Mitigation Measure NOI-3 (Operational Noise Performance Standards for the Rooftop Terrace): Design plans shall be amended to include construction of a 5-foot barrier as indicated in Figure 13 of the *Inn at the Abbey Environmental Noise and Vibration Assessment* (Appendix K) to reduce noise levels from outdoor activities at the rooftop terrace. This would limit the noticeable increase in noise generated by indoor amplified sound that may occur within the interior lounge space that opens onto the exterior terrace. A 3-foot barrier shall be constructed around the perimeter of the rooftop terrace, and an extension of a 2-foot tall glass or plexiglass barrier on top of the barrier would reduce noise levels generated at the rooftop terrace by 5 dBA. Amplified music and speech within the outdoor portion of the rooftop terrace shall be prohibited.

Mitigation Measure NOI-4 (Operational Noise Performance Standards for the South Parcel Lawn): Design plans shall be amended to include construction of a 5-foot barrier as indicated in Figure 14 of the *Inn at the Abbey Environmental Noise and Vibration Assessment* (Appendix K) to reduce noise levels from outdoor activities at the South Parcel lawn. This would limit the noticeable increase in noise generated by occasional events at the outdoor activity space. The barrier shall have a minimum surface density of three lbs/ft² (e.g., one-inch thick marine-grade plywood, ½-inch laminated glass, concrete masonry units). The height of the barrier shall be measured from the pad elevation of the South Parcel lawn. Amplified music and speech within the outdoor South Parcel lawn shall be prohibited.

Finding: Pursuant to Public Resources Code Section 21081 (a) and CEQA Guidelines Section 15091 (a), the Board hereby finds that changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effects to a less than significant level.

Rationale: Based on the Final EIR (February 2026) and the administrative record, this potential noise impact is mitigated by adoption of Mitigation Measures NOI-1, NOI-3 and NOI-4 found on pages 4.10-20 to 4.10-23 of the DEIR as COA No. 6.13 (i) on IATA's Use Permit Major Modification No. P19-000383-MOD. Mitigation Measure NOI-1 would implement a construction noise logistics plan to reduce construction noise consistent with the noise limits of the County noise ordinance and would be sufficient to reduce the residual construction noise impact to less than significant. Implementation of Mitigation Measure NOI-3 would reduce the potential noise impact from the rooftop terrace by ensuring it is designed to meet the performance standards of Section 8.16.070 of the Napa County Code. As a result of mitigation, this impact would be reduced to a less than significant level. Implementation of Mitigation Measure NOI-4 would reduce the potential noise impact from South Parcel lawn noise by designing to meet the performance standards of Section 8.16.070 of the Napa County Code. As a result of mitigation, this impact would be reduced to a less than significant level.

2. Impact NOI-2 (Stationary Operational Noise Sources): Operation of the Project would increase ambient noise levels in the immediate Project site vicinity primarily associated with the operation of new building stationary equipment, such as HVAC systems. Napa County Code section 8.16.070 establishes performance standards for exposure to noise from stationary/non-transportation sources at the property line of noise-sensitive uses. Specifically, noise exposure is limited to 50 dBA and 75 dBA at the property lines of residential property and industrial property, respectively. All of these standards apply at the property line.

An analysis of mechanical noise impacts was included in the Noise and Vibration Assessment (Appendix K of the DEIR). There are no specific building designs and neither locations nor specifications for mechanical equipment are available at this time. Therefore, it is not possible to provide specific estimates of the noise levels at individual receptor locations that would result from operation of stationary sources. It can be reasonably anticipated that building mechanical equipment would be roof-mounted, which would generally reduce noise levels for receptors. However, this analysis conservatively assumes the worst-case scenario, which would place mechanical equipment for each of the future buildings on the ground level along the building facades facing the nearby land uses. Given the attenuation rate of 6 dBA per doubling of the distance for mechanical equipment from the source to nearest sensitive receptors, generated noise levels from mechanical equipment would be less than 45 dBA L₅₀ at all residences to the east of SR 29 and the winery to the west of the highway. Noise levels at these receptors would not exceed exterior standards. Residences located west of SR 29 currently experience ambient daytime noise levels ranging from 52 to 75 dBA L₅₀ (average of 70 dBA L₅₀) and nighttime noise levels ranging from 30 to 50 dBA L₅₀ (average of 46 dBA L₅₀).

Section 8.16.070 of the Napa County Municipal Code states that if the measured ambient noise level differs from that permissible within any of the first four noise limit categories (above), the allowable noise exposure standard shall be the ambient noise level (Napa County, 2022). Since the recorded ambient noise levels exceed the exterior noise standards, the existing ambient noise level is the Exterior Noise Limit standard. The Project-generated noise levels from mechanical equipment would be less than the existing daytime ambient noise level of 70 dBA L₅₀ for residences located west of SR 29. However, Project-generated noise levels from mechanical equipment would potentially exceed the average nighttime noise level of 46 dBA L₅₀ at the residences nearest to the Project site and this impact would be potentially significant.

Mitigation Measure NOI-2 (Operational Noise Performance Standards for Building Stationary Equipment): Before the issuance of any building permit, the Project Applicant shall ensure that all mechanical equipment is selected and designed to reduce impacts on surrounding uses to meet the performance standards of Section 8.16.070 of the Napa County Code to ensure that noise from stationary sources such as mechanical equipment is limited to 50 dBA and

75 dBA at the property lines of residential and industrial off-site (Napa County) receivers,² respectively.

If noise levels exceed these standards, the activity causing the noise shall be abated until appropriate noise reduction measures have been installed and compliance verified by the County. Methods of achieving these standards include using low-noise-emitting HVAC equipment, locating HVAC and other mechanical equipment within a rooftop mechanical penthouse, and using shields and parapets to reduce noise levels to adjacent land uses.

An acoustical study shall be prepared during final building design to evaluate the potential noise generated by building mechanical equipment and to identify the necessary noise controls that are included in the design to meet the County's requirements. A qualified acoustical consultant shall be retained by Project Applicant to review specific noise reduction measures for mechanical equipment. Reduction measures may include, but are not limited to a selection of equipment that emits low noise levels and/installation of noise barriers such as enclosures and parapet walls to block the line-of-sight between the noise source and the nearest receptors. Alternate measures may include locating equipment in less noise-sensitive areas, such as the rooftop of the hotel buildings away from the building's edge nearest the single-family residences or in locations around the building facades facing away from the nearby receptors. The study shall be submitted to the PBES Department for review and approval before the issuance of any building permit.

Finding: Pursuant to Public Resources Code Section 21081 (a) and CEQA Guidelines Section 15091 (a), the Board hereby finds that changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effects to a less than significant level.

Rationale: Based on the Final EIR (February 2026) and the administrative record, this potential noise impact is mitigated by adoption of Mitigation Measure NOI-2 found on page 4.10-22 of the DEIR as COA No. 6.13 (j) on IATA's Use Permit Major Modification No. P19-000383-MOD. Implementation of Mitigation Measure NOI-2 would reduce the potential noise impact from stationary sources during operation by requiring that all mechanical equipment is selected and designed to meet the performance standards of Section 8.16.070 of the Napa County Code. As a result of mitigation, this impact would be reduced to a less-than-significant level.

3. Impact NOI-1.CU: The Project, when combined with other past, present, or reasonably foreseeable projects, would not contribute considerably to cumulative impacts on noise and vibration. The geographic scope of analysis for cumulative noise and vibration construction impacts encompasses sensitive receptors within approximately 1,000-feet of the Project site. Beyond 1,000-feet, the contributions of noise and vibration from other projects would be greatly attenuated through both distance and intervening structures, and their contribution would be expected to be minimal.

² The County Code equates wineries with industrial uses for the purposes of noise exposure.

Table 4.0-1 in the DEIR, lists the reasonably foreseeable projects in the vicinity of the Project site. Only three of these cumulative projects, the Vine Trail project, the Duckhorn Vineyards Winery Major Modification project, and the Vineyard 29 Winery Major Modification project, are within 1,000-feet of the Project site. The Vine Trail project has completed construction as of August 2024, and as such, would not contribute any construction-related noise. The project is a shared-use bicycle and pedestrian path and would not include any operational traffic. The Vineyard 29 project requests recognition and authorization of the existing employees, visitation and marketing events as well as an increase in the winery's production, visitors, employees, and marketing. Construction associated with the Vineyard 29 would be primarily surface-level including parking, roadway, and utility improvements. No building construction activities would occur. As such, minimal construction noise would be anticipated, and the Vineyard 29 project would not combine with the Project such that a significant cumulative construction noise or vibration impact would occur. During operation, the Vineyard 29 project would result in additional eight (8) employees and 20 visitors to the site per day compared to existing conditions (Napa County, 2023). As such, minimal operational and traffic noise impacts associated with the additional visitors and winery production increase would not combine with the Project such that a significant cumulative operational noise or vibration impact would occur.

Construction activity associated with the Project could overlap with construction activity associated with the Duckhorn project and result in a cumulative noise impact. However, as discussed under Impact NOI-1, the Project would be required to implement Mitigation Measure NOI-1: Construction Noise Control Measures, which would reduce the Project's contribution to potential cumulative construction noise impacts during all activities. During operation, the Duckhorn project would result in an increase in daily visitation, by increasing their existing *By Appointment Tours and Tastings* of 82 visitors per day for a proposed total of 197 daily visitors. This increase in visitors is estimated to result in a net increase of 17 peak-hour trips during both the weekday and weekend afternoon peak hour (Napa County, 2024). As such, minimal operational traffic noise impacts associated with the additional visitation are anticipated and would not combine with the Project such that a significant cumulative impact would occur. Additionally, regarding operational stationary noise sources, Napa County Code section 8.16.070 establishes performance standards for exposure to noise from stationary/non-transportation sources at the property line of noise-sensitive uses. While the stationary noise associated with the Project could combine with the Duckhorn project, Mitigation Measures NOI-2, NOI-3, and NOI-4 would reduce the Project's contribution to potential cumulative operational stationary noise impacts, and would be sufficient to reduce the Project's contribution to cumulative construction noise impacts to a less-than- significant level.

Additionally, the Noise and Vibration Assessment (Appendix K to the DEIR), analyzed potential cumulative increases in operational traffic noise. A significant impact could occur if the future cumulative traffic noise level increase were either 3 dBA Ldn or greater for future levels exceeding 60 dBA Ldn or 5 dBA Ldn or greater for future levels at or below 60 dBA Ldn and if the Project were to make a "cumulatively considerable" contribution to the overall traffic noise increase. A "cumulatively considerable" contribution would be defined as an increase of 1 dBA Ldn or more attributable solely to the Project.

The Project traffic volumes were added to the future peak hour traffic volumes to generate the future plus Project peak hour scenario. By comparing both future and future plus Project scenarios to the existing peak hour scenario, the noise level increases with and without Project traffic were estimated. Traffic noise level increases estimated for the future scenario (no Project) were 1 dBA Ldn along SR 29, 1 dBA Ldn along Lodi Lane, and 4 dBA Ldn along Silverado Trail. The same noise level increases along SR 29 and Silverado Trail were calculated when comparing the future plus Project scenario to the existing peak hour traffic volumes. While a 2 dBA Ldn increase was calculated along Lodi Lane during the peak hour on weekends, this would be a less-than-significant impact since the increase along Lodi Lane would be less than 5 dBA Ldn under both future scenarios.

The rest of the cumulative projects are further than 1,000 feet and are therefore sufficiently distant to not meaningfully contribute to cumulative construction-related or operational noise or vibration impacts. As a result, cumulative noise and vibration impacts would be the same as the project-level impacts identified above.

Mitigation Measures: Mitigation Measure NOI-1, NOI-2, NOI-3 and NOI-4 are incorporated here by reference.

Finding: Pursuant to Public Resources Code Section 21081 (a) and CEQA Guidelines Section 15091 (a), the Board hereby finds that changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effects to a less than significant level.

Rationale: Based on the Final EIR (February 2026) and the administrative record, this potential cumulative noise impact is mitigated by adoption of Mitigation Measures NOI-1, NOI-2, NOI-3 and NOI-4 found on pages 4.10-20 to 4.10-23 of the DEIR as COA Nos. 6.13 (i), (j), (k) and (l) on IATA's Use Permit Major Modification No. P19-000383-MOD. Implementation of Mitigation Measure NOI-1 would implement a construction noise logistics plan to reduce construction noise to be consistent with the noise limits of the County noise ordinance and would be sufficient to reduce the Project's contribution to cumulative construction noise impacts to a less than-significant level. Implementation of Mitigation Measure NOI-2 would reduce the potential noise impact from stationary sources during operation by requiring that all mechanical equipment is selected and designed to meet the performance standards of Section 8.16.070 of the Napa County Code. Implementation of Mitigation Measures NOI-3 and NOI-4 would require noise barriers to reduce noise impact and prohibit amplified music and speech within the outdoor portion of the rooftop terrace. As a result of these Mitigation Measures, this cumulative noise impact would be reduced to a less than significant level.

F. TRANSPORTATION

1. Impact TRA-1: Per General Plan Circulation Element Policy CIR-7, the County expects development projects to achieve a 15 percent 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.” As discussed under Impact TRA-2 below, while not required to reduce VMT impacts, which would be less than significant for the Project according to the County’s TIS Guidelines, in order to demonstrate consistency with General Plan Policy CIR-7 and CIR-23, and reduce Greenhouse Gas (GHG) emissions associated with the Project, the TIS (Appendix L) identified trip and VMT reduction measures, including a recommended employee transportation demand management (TDM) program, on-site employee housing, and visitor trip reduction measures, that aim to reduce unmitigated VMT by 15 or more percent.

Mitigation Measure: Mitigation Measure TRA-1 is incorporated here by reference.

Finding: Pursuant to Public Resources Code Section 21081 (a) and CEQA Guidelines Section 15091 (a), the Board hereby finds that changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effects to a less than significant level.

Rationale: Based on the Final EIR (February 2026) and the administrative record, this potential transportation impact is mitigated by adoption of Mitigation Measure TRA-1 found on pages 4.13-20 to 4.13-22 of the DEIR as COA No. 6.13 (m) on IATA’s Use Permit Major Modification No. P19-000383-MOD. After accounting for internal capture trips, on-site employee housing, employee trip reduction programs, and visitor trip reduction programs, Project-generated trips would be reduced to 19 percent below estimates using standard ITE rates. Mitigation Measure TRA-1 includes requirements to ensure that the employee TDM program measures are enacted, on-site employee housing is deed restricted, and bicycles are provided on-site for guest use. This exceeds the County requirement for projects to reduce trips to 15 percent below expected levels. Additionally, to ensure future effectiveness, Mitigation Measure TRA-1 requires that the employee TDM program be reevaluated and modified, if necessary, after two years of operation. Therefore, with implementation of Mitigation Measure TRA-1, the impact would be less than significant, and the Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities and the impact would be less than significant.

2. Impact TRA-3: The discussion below addresses proposed circulation modifications and potential transportation hazards associated with the Project.

Lodi Lane Crossing Improvement. The Project would not include any changes to existing road, bicycle, or pedestrian infrastructure, except for the proposed at-grade street crossing enhancement to the existing Vine Trail crossing at Lodi Lane and SR 29. If the crossing improvement were to introduce a design feature that would increase transportation-related hazards, this would be considered a potentially significant impact. A conceptual design for the Lodi Lane crossing improvement is shown in Figure 4.13-2 of the DEIR. The conceptual design includes a 6-foot-wide raised median curb with a 6-foot-wide by 10-foot-long pedestrian refuse area that would taper along Lodi Lane. The conceptual design also includes standard Caltrans 24-inch-wide crosswalk striping. Given that the North and South Parcels are segmented by Lodi Lane, there is also a need for a connected pedestrian network within the Project site and from one

side of Lodi Lane to the other. This improvement proposed by the Project Applicant to be further designed in coordination with the Napa County Public Works Department to increase pedestrian, bicycle, and on-site operational safety and traffic calming.

Collision Analysis. The TIS (Appendix L) reviewed collision history in the Project area to determine any trends or patterns that may indicate a safety issue. The intersection of SR 29/Lodi Lane had a collision rate below the Statewide average; however, the intersection of Silverado Trail/Lodi Lane had a collision rate substantially higher than the Statewide average which warranted further analysis. Of the five total collisions, three were rear-ends attributed to unsafe speeds and four of the five occurred in the northbound direction. The other two collisions were an overturn attributed to unsafe speed and a broadside. The two horizontal curves to the south of the intersection have a posted advisory speed of 40 mph and there is approximately 300 feet of stopping sight distance available in the northbound direction while traversing the curves, which is the exact amount recommended by Caltrans for speeds of 40 mph, so adequate stopping sight distance is provided for vehicles travelling at the advisory speed. However, if motorists travel at speeds above 40 mph, sight distance is less than the recommended minimum. Installation of a speed feedback sign near the curves would make motorists more aware of their speeds and encourage travel at a more appropriate speed for the amount of stopping distance. The TIS recommended that the Project Applicant work with County staff to install a speed feedback sign on Silverado Trail in the northbound direction between the driveway to Melka Estates winery and the horizontal curve.

SR 29 experienced collisions at a below-average rate and Silverado Trail had a calculated collision rate higher than the Statewide average. There were no collisions reported on Lodi Lane during the evaluation period. Of the 15 collisions on the segment of Silverado Trail, more than half had unsafe speed as the primary collision factor, which is consistent with the collisions that occurred at the intersection of Silverado Trail/Lodi Lane. Five collisions were attributed to improper turning or wrong side of the road and are likely due to the fact that the 0.7-mile roadway segment has five horizontal curves. Installation of a speed feedback sign near the Melka Estates Winery driveway on Silverado Trail would help reduce collisions at the Lodi Lane intersection, and along the Silverado Trail segment generally.

Turn Lanes. The TIS also evaluated the operation of the Project driveways and the effect it could have on the roadway to which it would connect (i.e., SR 29). The TIS analyzed the potential need for a right- or left-turn lane on SR 29 at the Project Driveway 2, the main entrance to the site, considering existing and future conditions with or without the Project. The need for a right-turn lane or taper³ on SR 29 at Driveway 2 would not be warranted and no additional facilities would be recommended. For a left-turn on SR 29 at Driveway 2, a left-turn lane would not be warranted under existing conditions with or without the Project; however, due to the large growth anticipated on SR 29, a left-turn lane would be warranted on SR 29 at Driveway 2 under future conditions with or without the Project. Because the Project site has multiple access points, the TIS recommended that rather than constructing a left-turn lane that meets current Caltrans highway design standards, left-turns should be prohibited at Driveway 2. Signage should be

³ A right-turn taper is a shoulder area that gets progressively wider as the motorist drives toward the intersection.

installed in the southbound direction on SR 29 that reads “Freemark Abbey Winery and Resort Use Lodi Lane” or similar to be reviewed and approved by the County and Caltrans prior to installation. In addition, a mini "pork-chop" island⁴ should be installed at Driveway 2 to restrict access to right-turn movements only at this location.

Sight Distance. At driveways, a substantially clear line of sight should be maintained between the driver of a vehicle waiting at the crossroad and the driver of an approaching vehicle. The TIS evaluated site distances along SR 29 and Lodi Lane at the main driveways (Driveways 2 and 3 in Figure 4.13-3) based on sight distance criteria contained in the Caltrans *Highway Design Manual*. Adequate sight distance is available in each direction along SR 29 and Lodi Lane to accommodate all turns, although landscaping could affect sight lines. The TIS recommended that any landscaping within the vision triangles at the driveways on SR 29 or Lodi Lane should be planted and maintained such as it is less than 3 feet more than 7 feet in height to maximize clear sight lines.

Mitigation Measure TRA-2 (Lodi Lane Crossing Improvement and Safety Improvements): The Project Applicant shall implement the following safety improvements:

- The at-grade crossing improvement proposed at Lodi Lane shall be constructed in accordance with the current Napa County Road and Street Standards and State Highway Design standards at the time of submittal of final design and shall be reviewed by the County and Caltrans staff and subject to approval by the Napa County Public Works Department prior to the issuance of a grading permit for the Project.
- The Project Applicant shall install a speed feedback sign on Silverado Trail in the northbound direction between the driveway to the Melka Estates Winery (2900 Silverado Trail) and the horizontal curve before Bournemouth Road. The exact location of the sign shall be coordinated with Napa County Public Works Department staff prior to the issuance of a grading permit for the Project.
- To ensure that sight lines remain adequate, any landscaping within the vision triangles at the driveways on SR 29 or Lodi Lane shall be planted and maintained such as it is less than 3 feet more than 7 feet in height to maximize clear sight lines. An ongoing maintenance plan shall be submitted to and approved by the Napa County Public Works Department prior to the issuance of a grading permit for the Project.
- Prior to a final certificate of occupancy for the Project, the Project Applicant shall install signage or other appropriate measures in the southbound direction on SR 29 that prohibits left-turns at Driveway 2 (as shown in the Project’s Traffic Impact Study, Appendix L). The signage shall be reviewed and approved by the Napa County Public Works Department and Caltrans and read “Freemark Abbey Winery and Resort Use Lodi Lane” or similar. All southbound left-turns into the Project site shall occur via the existing left-turn lane at Lodi Lane. Additionally, the Project

⁴ A pork-chop island is a triangular shaped intersection traffic control island which splits the flow of traffic in two, one to turn using the slip lanes, and one to go through or cross traffic lanes.

Applicant shall construct a mini pork-chop island or other similar features to delineate that only right-turns are allowed at Driveway 2 on SR 29.

Finding: Pursuant to Public Resources Code Section 21081 (a) and CEQA Guidelines Section 15091 (a), the Board hereby finds that changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effects to a less than significant level.

Rationale: Based on the Final EIR (February 2026) and the administrative record, this potential transportation impact is mitigated by adoption of Mitigation Measure TRA-2 found on page 4.13-29 of the DEIR as COA No. 6.13 (n) on IATA's Use Permit Major Modification No. P19-000383-MOD. Mitigation Measure TRA-2 would ensure that safety improvements, including final design of the Lodi Lane crossing improvement, a speed feedback sign on Silverado Trail, maintenance of landscaping for sight lines, and a prohibition of left-turns from SR 29 into the Project driveway, would be implemented. It would also ensure that ensure the final design of the crossing improvement is reviewed by County and Caltrans staff and constructed in accordance with the Napa County Road and Street Standards and State Highway Design standards. Therefore, with implementation of Mitigation Measure TRA-2, the Project would not result in any impacts related to increased transportation hazards and the impact would be less than significant.

3. Impact TRA-1.CU: The discussion below addresses cumulative traffic impacts resulting from the Project.

VMT. Cumulative projects, including the project (except for the Vine Trail project), would introduce new vehicle trips to the Project area and accordingly result in increased overall VMT. The cumulative increase in VMT would be considered a potentially significant impact. As discussed under Impact TRA-2 above, according to the County's TIS Guidelines, since the trips associated with the entitled, non-operational uses exceed the trips associated with the proposed uses under the Project resulting in a net reduction of 152 trips, the Project would generate less than 110 net new daily passenger vehicle and truck trips and the Project's VMT impact would be considered less than significant and the Project would not contribute considerably to cumulative VMT impacts. While not required to reduce VMT impacts, which would be less than significant for the Project according to the County's TIS Guidelines, in order to demonstrate consistency with General Plan Policies CIR-7 and CIR-23, and reduce GHG emissions associated with the Project, Mitigation Measure TRA-1 contains requirements for a TDM program that would reduce Project trips and VMT by at least 15 percent.

Transportation Hazards and Emergency Access. Cumulative projects, including any new roadway, bicycle, pedestrian, and transit infrastructure improvements, would be subject to, and designed in accordance with applicable design standards and specifications which address potential design hazards including sight distance, driveway placement, signage and striping, etc. Additionally, any new transportation facilities, or improvements to such facilities associated with subsequent projects would be constructed based on applicable industry design standards and best practices consistent with the County's zoning code and building design and inspection requirements. The County's evaluation of projects' access and circulation will incorporate

analysis with respect to County standards for emergency access as well as for service to pedestrians, bicyclists, and transit users. Of the projects listed in Table 4.0-1, only the Duckhorn Vineyards Winery Use Permit Major Modification project included a shared safety improvement. Installation of a speed feedback sign near the Melka Estates Winery driveway on Silverado Trail was also recommended in the TIS prepared for the Duckhorn project, noting that whichever project was approved first between the Duckhorn project and proposed Project should install the sign (W-Trans, 2021).

Mitigation Measures: Mitigation Measures TRA-1 and TRA-2 are incorporated here by reference.

Finding: Pursuant to Public Resources Code Section 21081 (a) and CEQA Guidelines Section 15091 (a), the Board hereby finds that changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effects to a less than significant level.

Rationale: Based on the Final EIR (February 2026) and the administrative record, this potential cumulative transportation impact is mitigated by adoption of Mitigation Measures TRA-1 and TRA-2 found on pages 4.13-31 to 4.13-32 of the DEIR and as COA Nos. 6.13 (m) and (n) on IATA's Use Permit Major Modification No. P19-000383-MOD. Mitigation Measure TRA-1 contains requirements for a TDM program that would reduce Project trips and VMT by at least 15 percent. Implementation of Mitigation Measure TRA-2 would ensure that the safety improvement is implemented. Therefore, impacts would be reduced to less than significant.

G. TRIBAL CULTURAL RESOURCES

1. Impact TCR-1: Based on the consultation, there are no known tribal cultural resources in the vicinity of the Project site. The results of the cultural resources records search conducted for the Project indicates that there are two pre-contact archaeological sites recorded in the vicinity of the Project site. One of these resources, site P-28-000952, was evaluated and determined to be not eligible for listing in the National and California Registers, and as such, does not qualify as a historical resource or unique archaeological resource. Based on the results of the surface and subsurface survey completed for the Project, site P-28-000389 is not located within areas of proposed ground disturbance for the Project. Despite the negative findings of the investigation, the unanticipated discovery of significant archaeological resources, either associated with site P-28-000389 or a newly identified resource, cannot be entirely discounted. Disturbance of potentially significant archaeological resources during ground-disturbing activities associated with the Project could result in a potentially significant impact to tribal cultural resources.

Mitigation Measures: Mitigation Measures CUL-1a, CUL-1b, CUL-1c and CUL-2 are incorporated here by reference.

Finding: Pursuant to Public Resources Code Section 21081 (a) and CEQA Guidelines Section 15091 (a), the Board hereby finds that changes or alterations have been required in, or

incorporated into, the Project which avoid or substantially lessen the significant environmental effects to a less than significant level.

Rationale: Based on the Final EIR (February 2026) and the administrative record, this potential impact on tribal cultural resources is mitigated by adoption of Mitigation Measures CUL-1a, CUL-1b, CUL-1c, and CUL-2 found on pages 4.14-6 and 4.14-7 of the DEIR, page 4-10 of the FEIR and as COA Nos. 6.13 (f), 7.4 (b), (c) and (d) on IATA's Use Permit Major Modification No. P19-000383-MOD. Mitigation Measure CUL-1a would comply with the recommendations from Middletown Rancheria received during the consultation process described above. Implementation of Mitigation Measures CUL-1a, CUL-1b, CUL-1c, and CUL-2 would reduce potential impacts to tribal cultural resources by requiring a cultural resources sensitivity training prior to ground disturbing activity associated with the Project; archaeological and Native American monitoring during ground disturbing activities according to a Cultural Resources Monitoring Plan; and protocol for the inadvertent discovery of cultural materials and human remains. Therefore, with implementation of Mitigation Measures CUL-1a, CUL-1b, CUL-1c, and CUL-2, the impact would be less than significant.

2. Impact TCR-1.CU: The Project, when combined with other past, present, or reasonably foreseeable projects, would contribute considerably to cumulative impacts on tribal cultural resources. Cumulative development in portions of the County identified as the territory of the local Native American community could result in significant cumulative impacts on tribal cultural resources. This includes commercial and infrastructural development and maintenance projects slated for implementation within 0.5-mile of the Project site, as summarized in Table 4.0-1 of the DEIR. While no known archaeological resources are located within the Project's areas of direct impact, as evident by archival research and surface and subsurface field investigations, the potential exists for unknown archaeological resources and/or human remains, which could also be considered tribal cultural resource. Each individual project is subject to review under CEQA and therefore would be required to avoid, minimize, and compensate for any significant impacts on sensitive cultural resources, such that the cumulative impact would be reduced, though not completely eliminated. Because not all such impacts from these other projects have been or can be reduced with certainty to less-than-significant levels, the loss of any archaeological resources and/or human remains, which could also be considered tribal cultural resources, would result in a potentially significant cumulative impact.

As discussed above, there is low potential for the discovery of cultural materials, including human remains, during Project implementation. However, despite the low potential inferred through archival research and field investigation, ground disturbing activity within the Project site has the potential to encounter previously unrecorded archaeological resources and/or human remains, which could also be considered tribal cultural resources, and construction-associated grading and excavation could destroy these resources. As a result, the Project could result in a considerable contribution to the cumulative loss of tribal cultural resources, and this cumulative impact would be potentially significant.

Mitigation Measures: Mitigation Measures CUL-1a, CUL-1b, CUL-1c, and CUL-2 are incorporated here by reference.

Finding: Pursuant to Public Resources Code Section 21081 (a) and CEQA Guidelines Section 15091 (a), the Board hereby finds that changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effects to a less than significant level.

Rationale: Based on the Final EIR (February 2026) and the administrative record, this potential impact on tribal cultural resources is mitigated by adoption of Mitigation Measures CUL-1a, CUL-1b, CUL-1c, and CUL-2 found on page 4.14-6 and 4.14-7 of the DEIR, page 4-10 of the FEIR and as COA Nos. 6.13 (f), 7.4 (b), (c) and (d) on IATA's Use Permit Major Modification No. P19-000383-MOD. Implementation of Mitigation Measures CUL-1a, CUL-1b, CUL-1c, and CUL-2 would effectively avoid damage to or loss of tribal cultural resources, and little to no residual impact would remain after mitigation. With implementation of these mitigation measures, the contribution of the Project to this cumulative impact would be less than considerable, and this impact would be reduced to a less-than-significant level.

H. UTILITIES AND SYSTEMS

1. **Impact UTL-1:** The Project would involve the construction of new water, wastewater, and stormwater infrastructure. Existing utility lines would be utilized by the Project for electric power and telecommunications services. Mitigation Measure GHG-1a would require that the Project's new buildings be designed as all-electric facilities and would not include new natural gas connections. As such, there would be no natural gas infrastructure constructed as part of the Project. Construction activities associated with the utility improvements would have the potential to result in significant or potentially significant impacts

Mitigation Measure: Mitigation Measure GHG-1a is incorporated here by reference.

Finding: Pursuant to Public Resources Code Section 21081 (a) and CEQA Guidelines Section 15091 (a), the Board hereby finds that changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effects to a less than significant level.

Rationale: Based on the Final EIR (February 2026) and the administrative record, this potential impact is mitigated by adoption of Mitigation Measure GHG-1a found on page 4.15-11 of the DEIR as COA No. 6.13 (g) on IATA's Use Permit Major Modification No. P19-000383-MOD. Mitigation Measure GHG-1a would require that the Project's new buildings be designed as all-electric facilities and would not include new natural gas connections. As such, there would be no natural gas infrastructure constructed as part of the Project.

I. GEOLGY AND SOILS

1) **Impact GEO-1:** No known paleontological resources are located on the project site; however, the potential for discovery of such resources exists because of the high biodiversity in the Napa Valley region (Napa County 2007:4.12-17). This impact would be potentially significant because paleontological resources could be discovered during project construction.

Mitigation Measure GEO-1: If site contractors discover paleontological resources during ground-disturbing activities of the project, the permittee and permittee’s contractors shall halt work in that area and within 50 feet of the find and immediately contact a qualified paleontologist to evaluate the find. Construction activities could continue in other areas. If the discovery proves to be significant under Society of Vertebrate Paleontology criteria, additional work, such as fossil recovery excavation, may be warranted and would be discussed in consultation with the applicant, Napa County, and/or any other relevant regulatory agency, as appropriate.

Finding: Pursuant to Public Resources Code Section 21081 (a) and CEQA Guidelines Section 15091 (a), the Board hereby finds that changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effects to a less than significant level.

Rationale: Based on the Initial Study (Appendix B -July 2020) and the administrative record, this potential impact is mitigated by adoption of Mitigation Measure GEO-1 found on pages 22 and 23 of the Initial Study (Appendix B) and as COA No. [REDACTED] on IATA’s Use Permit Major Modification No. P19-000383-MOD. Mitigation Measure GEO-1 would reduce effects on previously unknown paleontological resources if any are discovered during Project construction. This impact would be reduced to a less than significant level.

SECTION 8. Project Alternatives.

A. Legal Requirements.

Section 15126.6 (f) of the CEQA Guidelines requires that an EIR include a “reasonable range of alternatives to the project, or to the location of the project, which would avoid or substantially lessen any significant effects of the project.” Public Resources Code section 21081(b)(3) provides that when approving a project for which an EIR has been prepared, a public agency may find that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.

B. Alternatives Considered but Rejected.

As required pursuant to CEQA Guidelines Section 15126.6(c), consideration was given to alternatives that could avoid or substantially lessen potentially significant impacts resulting from the Project. The following alternative was considered but was not analyzed in detail because it would not fulfill most of the basic objectives of the Project, would not avoid or substantially lessen significant environmental impacts, and/or would not be feasible.

Off-Site Alternative. A potential off-site location relative to the Project was considered, with the goal of comparing the impacts of development of the same or a similar nature at a different location within the County. The Project Applicant owns various properties throughout the County, including vineyards and wineries. However, because the Project is distinctly located on a site that contains lands within the County’s Commercial Limited zoning district, has

existing residences, and is located adjacent to the Vine Trail, an alternative location would not contain the unique mix of land uses that would enable the Project Applicant to fulfill most of the basic objectives of the Project. An off-site alternative location is proposed to be rejected because there are no known Project Applicant-controlled sites that would accommodate the Project and reduce any impacts. For these reasons, an off-site alternative location was rejected.

C. Range of Alternatives.

The focus of the alternatives analysis under CEQA is the avoidance or substantial lessening of a project’s significant environmental effects. Chapter 4 of the Draft EIR assesses the direct and indirect environmental impacts that could potentially result from implementation of the Project. The alternatives analysis set forth in this chapter is provided to foster informed decision-making and public participation in the decision-making process.

In considering the alternatives analysis provided in this chapter, CEQA’s substantive mandate is as follows: “public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects” of the project (CEQA Statute, Public Resources Code, Section 21002). For the Project, mitigation measures have been identified to reduce all potentially significant environmental impacts to less-than-significant levels. Since these identified mitigation measures would be incorporated into the Project and the mitigation measures would be imposed, the availability of feasible alternatives becomes somewhat of a less important consideration, as they would not substantially lessen or avoid significant environmental effects of the Project.

In selecting alternatives for analysis, Napa County considered: the Project objectives and significant impacts identified above; the potential feasibility of alternatives based on factors in CEQA Guidelines Section 15126.6(f)(1); and whether the alternative would substantially reduce or eliminate environmental impacts of the Project. Consistent with these requirements, and CEQA’s requirement for a No Project Alternative, this chapter describes the following alternatives:

- Alternative A: No Project Alternative
- Alternative B: Reduced Development Alternative
- Alternative C: North Parcel Alternative

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**Table 5-1
Description of Project and Alternatives Selected for Evaluation**

Land Use	Project	Alternative A: No Project Alternative	Alternative B: Reduced Development Alternative	Alternative C: North Parcel Alternative
Hotel ^a	79 rooms	-	63 rooms	50 rooms
<i>North Parcel</i>	<i>50 rooms</i>	-	<i>40 rooms</i>	<i>50 rooms</i>
<i>South Parcel</i>	<i>29 rooms</i>	-	<i>23 rooms</i>	-
Restaurant/Cafe	-	5,100 sf	-	-
Motel	-	5 rooms	-	5 rooms
Retail	-	7,000 sf	-	7,000 sf

NOTES:

a. The Project includes retail, café, spa, and other amenity space which is considered auxiliary to the hotel. These uses are assumed to be included in the hotel land use category for the purpose of the analysis of alternatives.

D. Alternative A: No Project Alternative. The No Project Alternative (Alternative A) is the circumstance under which the Project does not proceed. This alternative is analyzed consistent with Section 15126.6(e) of the CEQA Guidelines, which states that the No Project Alternative must include the assumption that conditions at the time the Notice of Preparation (NOP) of an EIR was circulated for public review would not be changed because the Project would not be constructed, as well as the events or actions that would reasonably be expected to occur in the foreseeable future if the Project were not approved. The existing vacant commercial, restaurant, and motel buildings would either remain vacant or could be leased for a zoning consistent use. If the vacant space is leased it is assumed that it would reestablish vehicular, bike, and pedestrian activity to what it was when the buildings were previously occupied. Note, due to the condition of the restaurant building, the feasibility of this building being leased is unclear.

Comparison of No Project Environmental Impacts: Because Alternative A poses no change in development on the Project site compared to existing baseline conditions, no impacts would result. As such, this alternative would avoid all of the Project’s impacts that would be less than significant and less than significant with mitigation. However, it is noted that under Alternative A, there would be no reduction in groundwater use, no trip reduction over entitled use, and no affordable housing created.

This alternative would not meet any of the basic objectives of the Project: Alternative A would not develop hotel, retail, and restaurant uses on an infill project site consistent with the Commercial Limited zoning and General Plan Policy AG/LU-45 (objective 1); it would not generate positive fiscal impacts for Napa County through redevelopment and use of the Project site (objective 2); it would not develop land uses that do not exceed the intensities permitted by the historical/existing site entitlements (objective 3); it would not provide on-site affordable housing in existing residences (objective 4); it would not develop a project that integrates the

Vine Trail to allow project patrons alternative transportation and reduce vehicle miles travelled (objective 5); it would not implement a sustainable project that meets or exceeds CalGreen energy standards and maximizes reuse of water supply and minimizes water demand (objective 6); it would not ensure development of the Project site consistent with policies in the General Plan that support the economic viability of agriculture and envision additional commercial uses only within the portions of parcels zoned commercial (objective 7); it would not demonstrate leadership in sustainable development by constructing a project intended to reduce the consumption of energy and groundwater that obtains LEED minimum Gold Certification with the goal of achieving LEED Platinum Certification (objective 8); it would not help create a wildfire resilient community through facilitation of firefighting resources on Project site and supporting the establishment of a local Fire Wise Council for the Lodi Lane neighborhood (objective 9); and it would not ensure development of the Project site supports the maintenance, preservation, improvement, and development of housing in the unincorporated County consistent with State-mandated housing requirements, and balances job creation and the availability of affordable housing in the County (objective 10).

E. Alternative B: Reduced Development Alternative.

Description: The Reduced Development Alternative (Alternative B) is intended to reduce the scale of the Project (proposed hotel use) by approximately 20 percent, which would reduce less than significant VMT-related GHG and transportation impacts. Alternative B would reduce the hotel use on each parcel by approximately 20 percent, resulting in a 40-room hotel on the North Parcel and a 23-room hotel on the South Parcel. This analysis assumes Alternative B would be developed on the same building footprint as the Project. However, slightly less overall construction, shorter construction time periods, and less development intensity would occur with the smaller scale of the buildings. Construction of the same transportation/circulation and utility improvements as with the Project are also assumed. It is also assumed that all proposed public benefits would be provided without a 20 percent reduction, the on-site employee housing would be deed-restricted and current groundwater use would be reduced by 20 percent as with the Project.

Comparison of Alternative B Environmental Impacts:

Aesthetics. Aesthetics impacts associated with Alternative B could be slightly reduced as compared with the Project because the new buildings would be reduced in scale due to the fewer number of hotel rooms, which could reduce building heights in places. Alternative B would be anticipated to have similar lighting impacts, as the development footprint would remain the same as with the Project. The same condition of approval to prepare a lighting plan described in Chapter 4, Section 4.1, *Aesthetics*, would apply to Alternative B and impacts would be less than significant, the same as the Project.

Agriculture and Forestry Resources. The impacts of Alternative B on agriculture and forestry resources would be similar to those of the Project. Alternative B would involve similar ground-disturbing impacts, as the development footprint would remain the same as with the Project. Therefore, Alternative B would result in less-than-significant agriculture and forestry impacts, similar to the Project.

Air Quality. Alternative B would develop the Project site with a less intensive land use development program and fewer hotel rooms. This alternative may result in slightly less overall construction due to the reduced scale of buildings with fewer hotel rooms. As such, Alternative B would slightly reduce construction air quality impacts by reducing the amount of criteria air pollutants and toxic air contaminant (TAC) emissions emitted during the lower intensity construction periods. However, the development footprint would remain the same and sensitive receptors would be at the same distance and the same dust control mitigation measure (Mitigation Measure AIR-1) identified for the Project would be required. Alternative B would reduce the scale of the Project, which would reduce the number of vehicle trips being generated during operation and associated transportation-related operational air quality emissions. The same mitigation measure described in Chapter 4, Section 4.3, *Air Quality*, would apply to Alternative B and impacts would be less than significant with mitigation, the same as the Project.

Biological Resources. The impacts of the Alternative B related to biological resources would be similar to those of the Project. Alternative B would involve similar ground-disturbing impacts, as the development footprint would remain the same as with the Project. Since construction would still potentially affect rare plants, nesting birds, roosting bats, and protected trees, the same mitigation measures described in Chapter 4, Section 4.4, *Biological Resources*, would be incorporated into Alternative B, and the impacts would be less than significant with mitigation, the same as the Project.

Cultural and Tribal Cultural Resources. Alternative B would involve similar ground-disturbing impacts, as the development footprint would remain the same as with the Project. Therefore, impacts related to the potential to encounter undiscovered archaeological resources and tribal cultural resources would be the same as they would be under the Project. The same mitigation measures described in Chapter 4, Section 4.5, *Cultural Resources*, and Section 4.14, *Tribal Cultural Resources*, would be incorporated into Alternative B, and impacts would be less than significant with mitigation, the same as the Project.

Energy. Under Alternative B, energy use would be less than with the Project because there would be less overall development. Similar to the Project, Alternative B would be required to implement regulatory requirements described in Chapter 4, Section 4.6, *Energy*, and would not result in the inefficient, wasteful, or unnecessary consumption of energy. As such, Alternative B would result in less-than-significant energy impacts, similar to the Project.

Geology, Soils, and Paleontological Resources. Alternative B would involve similar ground-disturbing impacts, as the development footprint would remain the same as with the Project. Therefore, impacts related to the potential to encounter undiscovered paleontological resources would be the same as they would be under the Project. The same mitigation measure described in the Initial Study, Section VII, *Geology and Soils* (Appendix B), would be incorporated into Alternative B, and impacts would be less than significant with mitigation, the same as the Project.

Greenhouse Gas Emissions. Alternative B would reduce the scale of the Project, which would reduce the number of vehicle trips being generated during operation and associated

transportation-related GHG emissions. The same vehicle trip reduction measures would apply to Alternative B. As a result, GHG emissions would be less under Alternative B than with the Project and would be less than significant with compliance with the mitigation measures as described in Chapter 4, Section 4.7, *Greenhouse Gas Emissions*, the same as the Project.

Hazards and Hazardous Materials. Alternative B would involve similar ground-disturbing impacts, as the development footprint would remain the same as with the Project. Alternative B would also involve similar routine transport, use, or disposal of hazardous materials to the Project, though likely in reduced quantities due to the reduced scale of the Project. Similar to the Project, hazards and hazardous materials related impacts associated with Alternative B would be reduced to less than significant via compliance with regulatory requirements described in Initial Study Section IX, *Hazards and Hazardous Materials* (Appendix B).

Hydrology and Water Quality. The impacts of the Alternative B on hydrology and water quality would be similar to but reduced compared with the Project because development under the Alternative B would reduce the number of hotel rooms. Specifically, impacts related to hydrology and water quality would be reduced due to the reduced demand for groundwater due to fewer hotel rooms. The same regulations described in Chapter 4, Section 4.8, *Hydrology and Water Quality*, would apply to Alternative B and impacts would be less than significant, the same as the Project.

Land Use and Planning. Alternative B would include the same types of development as the Project, but with fewer hotel rooms. As with the Project, Alternative B would expand existing uses and would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect described in Chapter 4, Section 4.9, *Land Use and Planning*. As such, potential impacts of Alternative B related to land use and planning would be less than significant, the same as the Project.

Noise and Vibration. Alternative B would be constructed on the same footprint on the same Project site and therefore sensitive receptors would be at the same distance. Construction noise impacts associated with Alternative B would therefore be similar to those of the Project. Operational noise impacts associated with Alternative B could be slightly less because smaller HVAC equipment would be required if the new buildings are reduced in scale. The same mitigation measures described in Chapter 4, Section 4.10, *Noise and Vibration*, would be incorporated into Alternative B, and impacts would be less than significant with mitigation, the same as the Project.

Population and Housing. Under Alternative B, the number of on-site employees and visitors would be less due to the reduced scale. Resulting impacts related to population growth would be less than significant, the same as the Project.

Public Services and Recreation. With a smaller population, demand for public services and recreation would be less than with the Project, and resulting impacts under Alternative B would be less than significant, the same as the Project.

Transportation. Alternative B would reduce the scale of development, which would reduce the overall VMT from the hotel use due to fewer trips being generated (approximately 515 Alternative B trips vs. 645 Project trips). Construction of the same transportation and circulation improvements are assumed. The same mitigation measures described in Chapter 4, Section 4.13, *Transportation*, would be incorporated into Alternative B, and impacts would be less than significant with mitigation, the same as the Project.

Utilities and Service Systems. The impacts of the Alternative B on utilities and service systems would be similar to those of the Project but reduced. Specifically, impacts related to water supply would be reduced due to the reduced demand for groundwater associated with the reduced number of hotel rooms. Construction of the same utility improvements as with the Project are also assumed, and as such, Alternative B would involve similar ground-disturbing impacts associated with utility improvements. The same mitigation measures described in Chapter 3, Section 3.14, *Utilities and Service Systems*, would be incorporated into Alternative B, and impacts would be less than significant with mitigation, the same as the Project.

Ability to Meet Project Objectives: Alternative B would meet all of the basic objectives of the Project, with some being met to a lesser extent. This alternative would meet some of the basic objectives of the Project: it would develop hotel, retail, and restaurant uses on an infill project site consistent with the Commercial Limited zoning and General Plan Policy AG/LU-45 (objective 1); it would provide on-site affordable housing in existing residences (objective 4); it would develop a project that integrates the Vine Trail to allow project patrons alternative transportation and reduce vehicle miles travelled (objective 5); it would ensure development of the Project site consistent with policies in the General Plan that support the economic viability of agriculture and envision additional commercial uses only within the portions of parcels zoned commercial (objective 7); it would demonstrate leadership in sustainable development by constructing a project intended to reduce the consumption of energy and groundwater that designing to a LEED minimum Gold standard (objective 6); it would help contribute towards fuel modification measures that support the County's fire resilience goals (objective 9); and it would ensure development of the Project site supports the maintenance, preservation, improvement, and development of housing in the unincorporated County consistent with State-mandated housing requirements, and balances job creation and the availability of affordable housing in the County (objective 10). Alternative B would also achieve objective 3 to a greater extent than the Project because it would develop land uses that do not exceed the intensities permitted by the historical/existing site entitlements with less trip generation than the Project. However, even assuming that this alternative would be economically feasible, with fewer hotel rooms, Alternative B would achieve the following objectives to a lesser extent than the Project: generate positive fiscal impacts for Napa County through redevelopment and use of the Project site (objective 2); and implement a sustainable project that meets or exceeds CalGreen energy standards and maximizes reuse of water supply and minimizes water demand (objective 6).

F. Alternative C: North Parcel Alternative.

Description. The North Parcel Alternative (Alternative C) would demolish the existing restaurant and construct a new hotel on the North Parcel only. This alternative would not demolish the existing commercial or motel buildings on the South Parcel and it is assumed that

these vacant uses could be leased for a zoning consistent use. Alternative C is assumed to have reduced ground-disturbing impacts, as the demolition of the existing commercial and motel buildings on the South Parcel would not occur. With less ground disturbance, Alternative C is intended to reduce less-than-significant impacts to biological resources, cultural and tribal cultural resources, and paleontological resources. Alternative C is also intended to reduce less-than-significant air quality and noise impacts, as it would result in less overall construction, shorter construction time periods, and less construction intensity. It is also assumed that the on-site employee housing on the South Parcel would be deed-restricted as with the Project to meet affordable housing obligations and current groundwater use would be reduced by 20 percent. Under Alternative C, it is assumed that the Lodi Lane crossing improvement would not be constructed to facilitate connection between the North and South Parcels, as no hotel would be constructed on the South Parcel. Construction of similar utility improvements is assumed.

Comparison of Alternative C Environmental Impacts:

Aesthetics. Alternative C would result in a smaller development footprint because the South Parcel would not be redeveloped. Aesthetics impacts associated with Alternative C could be reduced as compared with the Project because the South Parcel would not be redeveloped with taller buildings. However, the visual quality of the South Parcel would also not be improved through the development of new buildings and landscaping. Alternative C would be anticipated to have reduced lighting impacts, as new lighting sources would only be added to the North Parcel. However, the same condition of approval to prepare a lighting plan described in Chapter 4, Section 4.1, *Aesthetics*, would apply to Alternative C and impacts would be less than significant, the same as the Project.

Agriculture and Forestry Resources. The impacts of Alternative C on agriculture and forestry resources would be similar to those of the Project. While Alternative C would involve reduced ground-disturbing impacts, the existing agricultural use is on the North Parcel. Therefore, Alternative C would result in less-than-significant agriculture and forestry impacts, similar to the Project.

Air Quality. Alternative C would require less ground disturbance and a smaller development footprint than the Project because the South Parcel would not be redeveloped. This alternative would result in less overall construction, shorter construction time periods, and less construction intensity. As such, Alternative C would reduce construction air quality impacts by reducing the amount of criteria air pollutants and TAC emissions emitted during the lower intensity construction periods. Construction-related health risk impacts would be reduced as construction on the North Parcel only would move construction activities further away from sensitive receptors. However, Mitigation Measure AIR-1 identified for the Project described in Chapter 4, Section 4.3, *Air Quality*, would be required. Alternative C would also result in an increase in the number of vehicle trips being generated during operation (see *Transportation* below) because the higher trip generating commercial and motel uses would be retained and associated transportation-related operational air quality emissions as compared with the Project. However, the magnitude of the trip increase is not likely to result in a significant impact. Overall, the same mitigation measure would apply to Alternative C and impacts would be less than significant with mitigation, the same as the Project.

Biological Resources. Alternative C would require less ground disturbance and a smaller development footprint compared with the Project because the South Parcel would not be redeveloped. As such, potential impacts to biological impacts would be reduced. Alternative C would involve less tree removal (approximately 74 trees removed under Alternative C vs. 97 trees removed under the Project), as approximately 23 additional trees on the South Parcel would be retained. Since construction would still potentially affect rare plants, nesting birds, roosting bats, and protected trees on the North Parcel, the same mitigation measures described in Chapter 4, Section 4.4, *Biological Resources*, would be incorporated into Alternative C, and the impacts would be less than significant with mitigation, the same as the Project.

Cultural and Tribal Cultural Resources. Alternative C would require less ground disturbance and a smaller development footprint compared with the Project because the South Parcel would not be redeveloped. Therefore, impacts related to the potential to encounter undiscovered archaeological resources and tribal cultural resources would be reduced. However, ground disturbance would still occur, and the same mitigation measures described in Chapter 4, Section 4.5, *Cultural Resources*, and Section 4.14, *Tribal Cultural Resources*, would be incorporated into Alternative C, and impacts would be less than significant with mitigation, the same as the Project.

Energy. Under Alternative C, energy use during construction would be less than with the Project because of less overall construction, shorter construction time periods, and less construction intensity. However, during operation, the existing commercial and motel buildings would not be as energy efficient compared to a new hotel building under the Project. Similar to the Project, Alternative C would be required to implement regulatory requirements described in Chapter 4, Section 4.6, *Energy*, and would not result in the inefficient, wasteful, or unnecessary consumption of energy. As such, Alternative C would result in less-than-significant energy impacts, similar to the Project.

Geology, Soils, and Paleontological Resources. Alternative C would result in less overall construction, shorter construction time periods, and reduced construction intensity. Specifically, the reduced construction intensity and duration would reduce the potential for construction-related erosion. Regarding seismic-related or other ground failure and paleontological resources, Alternative C would also involve reduced ground-disturbing impacts, as redevelopment of the South Parcel would not occur. The same mitigation measure described in the Initial Study, Section VII, *Geology and Soils* (Appendix B), would be incorporated into Alternative C, and impacts would be less than significant with mitigation, the same as the Project.

Greenhouse Gas Emissions. Alternative C would include less overall construction, resulting in fewer GHG emissions during construction. However, Alternative C would also result in an increase in the number of vehicle trips being generated during operation and associated transportation-related GHG emissions as a result of the retention of the commercial and motel uses on the South Parcel. The commercial uses in particular would lead to the generation of more trips than if a hotel were located on the South Parcel. The same vehicle trip reduction measures would apply to Alternative C. As a result, Alternative C GHG emissions would be less-than-significant with compliance with the mitigation measures as described in Chapter 4, Section 4.7,

Greenhouse Gas Emissions, the same as the Project.

Hazards and Hazardous Materials. Alternative C would involve reduced ground-disturbing impacts, as the redevelopment of the South Parcel would not occur. Alternative C would develop the North Parcel with the same land uses and involve similar routine transport, use, or disposal of hazardous materials to the Project. Similar to the Project, hazards and hazardous materials related impacts associated with Alternative C would be reduced to less-than-significant via compliance with regulatory requirements described in Initial Study Section IX, *Hazards and Hazardous Materials* (Appendix B).

Hydrology and Water Quality. Alternative C impacts on hydrology and water quality would be reduced compared with those of the Project. Specifically, the reduced construction intensity and duration would lessen the potential for pollutant discharges into the stormwater system and stormwater that could affect receiving waters. Alternative C would also reduce groundwater demand associated with the South Parcel. Existing South Parcel groundwater use is approximately 3.18 AFY, compared to the approximately 4.68 AFY of demand under the Project. However, it is noted that a greywater reuse system would not be developed under Alternative C. The same regulations described in Chapter 4, Section 4.8, *Hydrology and Water Quality*, would apply to Alternative C and impacts would be less-than significant, the same as the Project.

Land Use and Planning. Alternative C would include the same types of development as the Project, but with fewer hotel rooms. It would retain the existing motel and commercial uses on the South Parcel. As with the Project, Alternative C would expand existing uses and would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect described in Chapter 4, Section 4.9, *Land Use and Planning*. As such, potential impacts of Alternative C related to land use and planning would be less than significant, the same as the Project.

Noise and Vibration. Alternative C would involve reduced ground-disturbing impacts, as the redevelopment of the South Parcel would not occur. This alternative would result in less overall construction, shorter construction time periods, and less construction intensity. Construction noise impacts would be reduced as the construction work area would be further away from sensitive receptors. However, the same mitigation measures described in Chapter 4, Section 4.10, *Noise and Vibration*, would be incorporated into Alternative C, and impacts would be less than significant with mitigation, the same as the Project.

Population and Housing. Under Alternative C, the number of on-site employees would be anticipated to be the same as with the Project. While the hotel would not be developed on the South Parcel, the employees associated with the entitled commercial and motel uses on the South Parcel would be roughly the same. While fewer hotel employees would be needed because the new hotel would only be located on the North Parcel, the commercial and hotel uses on the South Parcel would need additional employees. Resulting impacts related to population growth would remain less than significant for Alternative C, the same as the Project.

Public Services and Recreation. Under Alternative C, with a similar population, the demand for public services and recreation would be the same as with the Project. Resulting

impacts related to public services and recreation would remain less than significant, the same as the Project.

Transportation. Alternative C would result in a higher trip generation than the Project (approximately 747 Alternative C trips vs. 645 Project trips) because the entitled, non-operational uses on the South Parcel (commercial and motel uses) would generate more trips than the proposed hotel use on the South Parcel under the Project. The 50 hotel rooms on the North Parcel in addition to the entitled, non-operational uses on the South Parcel (commercial and motel uses) would generate more trips overall than with the Project. However, Alternative C trips would still generate fewer trips than the existing entitled uses on the site (the No Project Alternative). Trip reduction measures and Mitigation Measure TRA-1 described in Chapter 4, Section 4.13, *Transportation*, would still apply to Alternative C, that would likely reduce impacts to a less than significant level. Although Alternative C would generate more trips, the resulting impacts would remain less than significant, the same as the Project.

Under Alternative C, it is assumed that the Lodi Lane crossing improvement would not be constructed to facilitate connection between the North and South Parcels, as no hotel would be constructed on the South Parcel. However, other safety improvements identified in Mitigation Measure TRA-2 would still be required. Therefore, impacts would be less than significant with mitigation, the same as the Project.

Utilities and Service Systems. The impacts of the Alternative C on utilities and service systems would be similar to those of the Project. Construction of the same utility improvements and associated ground-disturbing impacts are also assumed. The same mitigation measures described in Chapter 3, Section 3.14, *Utilities and Service Systems*, would be incorporated into Alternative C, and impacts would be less than significant with mitigation, the same as the Project.

Ability to Meet Project Objectives: Alternative C would meet all of the basic objectives of the Project, with most being met to a lesser extent. This alternative would meet objective 4 as it would provide on-site affordable housing in existing residential dwelling units and objective 10 as it would ensure development of the Project site supports the maintenance, preservation, improvement, and development of housing in the unincorporated County consistent with State-mandated housing requirements, and balances job creation and the availability of affordable housing in the County. Assuming similar Development Agreement terms are reached, Alternative C would also meet objective 7 by ensuring development of the Project site is consistent with policies in the General Plan that support the economic viability of agriculture and envision additional commercial uses only within the portions of parcels zoned commercial and by contributing towards fuel modification measures that support the County's fire resilience goals. However, conservatively presuming that this alternative would be economically feasible, it would achieve the following objectives to a lesser extent than the Project because the South Parcel would not be redeveloped: develop hotel, retail, and restaurant uses on an infill project site consistent with the Commercial Limited zoning and General Plan Policy AG/LU-45 (objective 1); generate positive fiscal impacts for Napa County through redevelopment and use of the Project site (objective 2); develop land uses that do not exceed the intensities permitted by the historical/existing site entitlements (objective 3); develop a project that integrates the Vine Trail to allow project patrons alternative transportation and reduce vehicle miles travelled

(objective 5); implement a sustainable project that meets or exceeds CalGreen energy standards and maximizes reuse of water supply and minimizes water demand (objective 6); and demonstrate leadership in sustainable development by constructing a project intended to reduce the consumption of energy and groundwater that is designed and constructed to a LEED Gold standard (objective 8).

G. Comparison of Alternatives.

CEQA requires a comparison of the alternatives to the Project (presented above) and suggests that a matrix may be used to summarize the comparison. DEIR Tables 5-2 and 5-3 compare the alternatives with each other, and with the Project. Table 5-2 includes an overview of each alternative analyzed above and shows how the results of the analyses compare to the results of the analysis of the Project in Chapter 4 and the Initial Study (Appendix B). Overall, this table shows that none of the alternatives considered would result in a significant and unavoidable impact, and all of the “build” alternatives would result in a similar degree of impact as the Project. Table 5-3 summarizes the ability of each alternative to meet the basic objectives for the Project and indicates that Alternative A would not have the ability to meet the basic objectives of the Project. Alternative B would meet all of the basic objectives of the Project, with some objectives being met to a lesser degree and one being met to a greater degree. Alternative C would have the ability to meet all of the basic objectives of the Project, although some to a lesser degree.

**TABLE 5-2
PROJECT ALTERNATIVES IMPACT SUMMARY AND COMPARISON**

Impact	Alternative A: No Project Alternative	Alternative B: Reduced Development Alternative	Alternative C: North Parcel Alternative	Project
Aesthetics	No Impact	Less than Significant	Less than Significant	Less than Significant
Agriculture and Forestry Resources	No Impact	Less than Significant	Less than Significant	Less than Significant
Air Quality	No Impact	LTS with Mitigation ↓	LTS with Mitigation ↓	LTS with Mitigation
Biological Resources	No Impact	LTS with Mitigation	LTS with Mitigation ↓	LTS with Mitigation
Cultural and Tribal Cultural Resources	No Impact	LTS with Mitigation	LTS with Mitigation ↓	LTS with Mitigation
Energy	No Impact	Less than Significant ↓	Less than Significant	Less than Significant
Geology, Soils, and Paleontological Resources	No Impact	LTS with Mitigation	LTS with Mitigation ↓	LTS with Mitigation
Greenhouse Gas Emissions	No Impact	LTS with Mitigation ↓	LTS with Mitigation ↑	LTS with Mitigation
Hazards and Hazardous Materials	No Impact	Less than Significant	Less than Significant	Less than Significant
Hydrology and Water Quality	No Impact	Less than Significant	Less than Significant	Less than Significant

Impact	Alternative A: No Project Alternative	Alternative B: Reduced Development Alternative	Alternative C: North Parcel Alternative	Project
Land Use and Planning	No Impact	Less than Significant	Less than Significant	Less than Significant
Noise and Vibration	No Impact	LTS with Mitigation ↓	LTS with Mitigation	LTS with Mitigation
Population and Housing	No Impact	Less than Significant ↓	Less than Significant	Less than Significant
Public Services and Recreation	No Impact	Less than Significant ↓	Less than Significant	Less than Significant
Transportation	No Impact	LTS with Mitigation ↓	LTS with Mitigation ↑	LTS with Mitigation
Utilities and Service Systems	No Impact	LTS with Mitigation	LTS with Mitigation	LTS with Mitigation

NOTES: LTS = Less than Significant ↑/↓ - The impact is more/less severe than compared to the Project.

The color gradients in the table are a visual representation of the significance findings with the lightest or absence of color representing the least amount of impact, and the darkest shade representing an impact that would be significant without mitigation.

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**TABLE 5-3
ABILITY OF PROJECT ALTERNATIVES TO SATISFY BASIC OBJECTIVES OF THE PROJECT**

Project Objective	Alternative A: No Project Alternative	Alternative B: Reduced Development Alternative	Alternative C: North Parcel Alternative
1. Develop hotel, retail, and restaurant uses on an infill project site consistent with the Commercial Limited zoning and General Plan Policy AG/LU-45.	Does not meet objective	Meets objective	Meets objective ↓
2. Generate positive fiscal impacts for Napa County through redevelopment and use of the Project site.	Does not meet objective	Meets objective ↓	Meets objective ↓
3. Develop land uses that do not exceed the intensities permitted by the historical/existing site entitlements.	Does not meet objective	Meets objective ↑	Meets objective ↓
4. Provide on-site affordable housing in existing residences.	Does not meet objective	Meets objective	Meets objective
5. Develop a project that integrates the Vine Trail to allow project patrons alternative transportation and reduce vehicle miles travelled.	Does not meet objective	Meets objective	Meets objective ↓
6. Implement a sustainable project that meets or exceeds CalGreen energy standards and maximizes reuse of water supply and minimizes water demand.	Does not meet objective	Meets objective ↓	Meets objective ↓
7. Ensure development of the Project site consistent with policies in the General Plan that support the economic viability of agriculture and supporting industries to ensure the preservation of agricultural lands and envision additional commercial uses only within the portions of parcels zoned commercial.	Does not meet objective	Meets objective	Meets objective
8. Demonstrate leadership in sustainable development by constructing a project intended to reduce the consumption of energy and groundwater that obtains LEED minimum Gold Certification with the goal of achieving LEED Platinum Certification and maintain certification through the life of the project.	Does not meet objective	Meets objective	Meets objective ↓
9. Help create a wildfire resilient community through facilitation of firefighting resources on Project site and supporting the establishment of a local Fire Wise Council for the Lodi Lane neighborhood.	Does not meet objective	Meets objective	Meets objective
10. Ensure development of the Project site supports the maintenance, preservation, improvement, and development of housing in the unincorporated County consistent with State-mandated housing requirements, and balances job creation and the availability of affordable housing in the County.	Does not meet objective	Meets objective	Meets objective

NOTES: ↑/↓ - The alternative is more (↑) / less (↓) aligned with the objective, compared to the Project.

H. Environmentally Superior Alternative.

The CEQA Guidelines specify that an EIR must identify the environmentally superior alternative among those discussed. If the environmentally superior alternative is the “No Project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. (CEQA Guidelines Section 15126.6(e)(2)).

The No Project Alternative (Alternative A) would be the most environmentally superior alternative with the fewest environmental impacts. However, Alternative A does not meet any of the basic objectives of the Project.

Since the environmentally superior alternative is Alternative A (No Project Alternative), the EIR also must identify an environmentally superior alternative from among the other alternatives. Determining an environmentally superior alternative can be difficult because of the many factors that must be balanced. For example, Alternative B (Reduced Development Alternative) could be preferred because, relative to the Project, it would reduce operational impacts due to the reduced scale of the Project, even though the impact conclusions would be the same as the Project. Alternative C (North Parcel Alternative) could be preferred because, relative to the Project, it would reduce ground disturbance during construction, even though the impact conclusions would be the same as the Project.

The County has identified Alternative B (Reduced Development Alternative) as the environmentally superior alternative because it would reduce operational impacts related to VMT and vehicle trips and would result in the greatest potential for energy efficiency and incorporation of green building design features of the built alternatives through new construction, even though the impact conclusions would be the same as the Project. However, although the alternatives identified reduce impacts, they would not substantially lessen or avoid significant environmental effects of the Project because the Project itself would not result in significant impacts.

The Board finds that the proposed Project is preferable because it meets the Project Applicant and County objectives while mitigating all impacts to a less than significant level. For these reasons, the Board rejects the No Project, Reduced Development and North Parcel Alternatives.

SECTION 9. Recirculation is Not Required.

A. In the course of responding to comments received during the public review and comment period on the Draft EIR, certain portions of the Draft EIR have been modified and some new information amplifying and clarifying information in the Draft EIR has been added to the Final EIR as an Errata to the DEIR. Adoption and implementation of the Project will not result in any significant environmental impacts not identified in the Draft EIR or result in a substantial increase in the severity of a significant environmental impact identified in the Draft EIR. The Project has impacts that would be equal to or less than what was analyzed and considered in the DEIR under the Project. There are no substantial changes in the proposed

Project or the circumstances under which the Project is being undertaken that necessitate revisions of the Draft EIR, nor has significant new information become available.

B. “Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.” (14 Cal Code Regs. Section 15088.5(b).) The Planning Board hereby determines, based on the standards provided in Public Resources Code Section 21092.1 and Section 15088.5 of the CEQA Guidelines, that recirculation of the Draft EIR is not required prior to approval of the Inn at the Abbey project.

SECTION 10. Mitigation Monitoring and Reporting Program.

The Board hereby adopts the Mitigation Monitoring and Reporting Program attached as Attachment “A.”

SECTION 11. General Plan Consistency.

The Board of Supervisors hereby finds that implementation of the Inn at the Abbey is consistent with the Napa County General Plan and concurs with the analysis, findings and conclusions set forth in the “General Plan Consistency Analysis” attached as Attachment “B” and incorporated here by reference.

SECTION 12. Findings for Approval of Use Permit Modification

Napa County Code section 18.124.070 contains the findings required for approval of a major modification to a use permit. The Board of Supervisors hereby adopts the Use Permit Major Modification analysis, findings and conclusions set forth in “Use Permit Major Modification Findings” attached as Attachment “C” subject to the attached Conditions of Approval in Attachment “D” attached and incorporated here by reference.

SECTION 13. Record of Proceedings.

The Record of Proceedings (record) upon which the Board of Supervisors bases these Findings and its actions and determinations regarding the proposed Project includes, but is not limited to:

1. The NOP, comments received on the NOP and all other public notices issued by the County in relation to the Inn at the Abbey Project (e.g., Notice of Availability).
2. The Draft EIR, the Final EIR and the appendices and technical reports cited in and/or relied upon in preparing the Draft and Final EIRs;
3. The Final EIR, including comment letters, oral testimony and technical materials cited in the document;
4. All non-draft and/or non-confidential reports and memoranda prepared by the County and consultants related to the EIR, its analysis and findings;

5. All staff reports, County files and records and other documents, prepared for and/or submitted to the Planning Board and/or the County relating to the Final EIR and/or Inn at the Abbey Project P19-0038-MOD;
6. The evidence, facts, findings and other determinations set forth in this Resolution;
7. Minutes and transcripts of the discussions regarding the Inn at the Abbey Project P19-0038-MOD and/or Project components at public hearings or scoping meetings held by the PBES Department, the Planning Commission and/or Board;
8. The Napa County General Plan;
9. The Napa County Code;
10. All applications, designs, plans, studies, data and correspondence submitted by the Applicant in connection with the Final EIR and/or P19-0038-MOD;
11. All documentary and oral evidence received at public hearings or submitted to the County during the comment periods relating to the Final EIR and the Inn at the Abbey Project P19-0038-MOD ;
12. All files, documents and records related to the Inn at the Abbey Project P19-0038-MOD; and
13. All other matters of common knowledge to the Board including, but not limited to, County, state, and federal laws, policies, rules, regulations, reports, records and projections related to development within the County of Napa and its surrounding areas.

The Final EIR (February 2026) is on file with the PBES Department and, along with the related planning and other County records, minutes and files constituting the record of proceedings, are incorporated herein by this reference.

SECTION 14. Location and Custodian of Records.

The documents and other materials that constitute the record of proceedings on which the Board’s findings regarding the mitigation measures and alternatives are based are located at the office and in the custody of the Napa County PBES Department, at 1195 Third Street, Second Floor, Napa, California. The location and custodian of these documents is provided in compliance with Public Resources Code Section 21081.6(a)(2) and 14 Cal. Code of Regulations Section 15091(e).

SECTION 15. Adoption of Project and Related Actions.

The Board of Supervisors hereby:

- A. Adopts the findings of facts and rationales as set forth in this Resolution;
- B. Rejects the No Project, Reduced Development and North Parcel Alternatives; and
- C. Approves Approving Use Permit Major Modification No. P19-00038-MOD for the Inn at the Abbey subject to the attached Conditions of Approval attached as Attachment “D” and incorporated here by reference.

SECTION 16. Filing Notice of Determination.

The Board hereby directs the Director of the PBES Department to file a Notice of Determination regarding the Inn at the Abbey Use Permit Major Modification No. P19-00038-MOD within five business days of adoption of this Resolution.

SECTION 17. Effective Date.

This Resolution shall take effect immediately.

THE FOREGOING RESOLUTION WAS DULY AND REGULARLY ADOPTED by the Napa County Board of Supervisors, State of California, at a regular meeting of the Board of Supervisors held on the ___ day of _____ 2026, by the following vote:

AYES: SUPERVISORS _____

NOES: SUPERVISORS _____

ABSTAIN: SUPERVISORS _____

ABSENT: SUPERVISORS _____

 AMBER MANFREE,
 Chair of the Board of Supervisors

<p>APPROVED AS TO FORM Office of County Counsel</p> <p>By: _____ County Counsel</p> <p>Date: _____</p>	<p>APPROVED BY THE NAPA COUNTY BOARD OF SUPERVISORS</p> <p>Date: _____</p> <p>Processed By: _____</p> <p>_____ Deputy Clerk of the Board</p>	<p>ATTEST: NEHA HOSKINS Clerk of the Board of Supervisors</p> <p>By: _____</p>
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