

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

Initial Study Checklist
(form updated January 2019)

1. **Project Title:** Eagle Vines Telecommunications Tower ATT, Use Permit #P18-00410
Eagle Vines Sprint Napa Airport Hwy 12 & 29 Relocation, Use Permit #P19-00337
2. **Property Owner:** Napa Sanitation District, 1515 Soscol Ferry Road, Napa, CA 94558
3. **County Contact Person, Phone Number and email:** Sean Kennings, 415-533-2111, sean@lakassociates.com
4. **Project Location and APN:** 580 S. Kelly Road, American Canyon, CA 94503; Agricultural Watershed – Airport Compatibility (AW:AC)
Zoning District: APN 057-060-007
5. **Project sponsor's name and address:** ATT Mobility; contact - Derek Turner, 1225 Clay Street, #5, San Francisco, CA 94108
Sprint; contact – Sean Prior (Precision SD), 5098 Foothills Blvd. 3-119, Roseville, CA 95747
6. **General Plan description:** Industrial
7. **Zoning:** Agricultural Watershed: Airport Compatibility (AW:AC)
8. **Description of Project:**

Co-location of two wireless telecommunications facilities (AT&T and Sprint) is proposed to be developed on the Eagle Vines Golf Club (EVGC) property, a public golf course, located on the east side of South Kelly Road, south of Highway 12/Lincoln Highway in American Canyon, Napa County. The golf course property is owned by the Napa Sanitation District. Although both carriers will utilize different lease areas for the telecommunications equipment and require a separate 55-foot to 60-foot tall stealth "monopine" antenna tower, the proposed project is considered co-located based on the general clustering of the proposed infrastructure. These monopine towers will be located approximately 160 feet apart along the northwest corner of the outside fence of the existing golf course driving range and the two equipment areas are approximately 55 feet apart.

The proposed AT&T facility will be situated in a grove of trees between an existing golf cart path and the seventh golf hole for the EVGC. The top of the antennae will be mounted at 50 feet on the stealth 'faux pine' camouflaged monopine tower, although the faux branches would extend the height an additional 5-feet resulting in a total height of 55 feet above ground level. The location is adjacent to the northwest corner of the driving range and within the landscaped planters and fairway borders and north of the asphalt paved parking lots of the existing EVGC. AT&T proposes to install a wireless telecommunications facility (including (3) antennae at sectors A, B, & C for a total of (9) and install (6) RRHs at sectors A,B, & C for a total of 18). The antennas will be mounted on a 55-foot 'faux pine' camouflaged monopine with centerlines 37 and 47 feet above ground level. The tower is proposed immediately north of golf course driving range approximately 500 feet southeast of the corner of S. Kelly Road and State Route 12/29. The AT&T equipment lease area would be approximately 150 feet north of the existing golf cart shed.

The proposed Sprint facility will be situated directly south of the proposed equipment area to the north of the existing golf cart shed and west of the driving range. Sprint proposes to upgrade its base station and install a wireless telecommunications facility on a similar faux monopine and mount an array of panel antennae (install 6 directional panel antennas, 3 each), and a 2-foot diameter microwave antenna to the structure at radiating center elevations of 48 feet and 54 feet above ground level, respectively. Similar to the AT&T tower, the top of the antennae will be mounted at 55 feet on the stealth 'faux pine' camouflaged monopine tower, although the faux branches would extend the height an additional 5-feet resulting in a total height of 60 feet above ground level. The Sprint tower and equipment lease area would be approximately 77 feet north of the existing golf cart shed.

The associated telecommunication equipment for both carriers will be installed within new 20' x 15' fenced ground electronics equipment enclosure areas containing 24-hour emergency backup power supply and equipment structures. The wireless telecommunications facilities would be connected to power and telecommunications connections via an underground trench (within a three-foot-wide easement) to subsurface connections to the south. Approximately 546 feet of maximum ground disturbance will be required for the installation of the fiber utilities, and 533 feet of maximum ground disturbance will be required for the installation of the power utility connection. This includes

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the trenching from the farthest tower (AT&T) located north of the driving range to the existing transformer located adjacent to the existing golf cart building and the connection to the existing fiber vault located just southeast of the existing golf course maintenance building. The ground disturbance will occur within established landscaped planters and along the landscaped fairway borders. Both facilities would be accessed by an access road from the south, including a new fire access turnaround located just south of the proposed equipment lease area and the Sprint tower.

The proposed wireless telecommunications facilities are required to maintain the services provided by the existing facility, including E-911 and wireless communications voice and data transmissions and receptions for the immediate surrounding area. The E-911 service is critical for the subject area due to the nearby major thoroughfares of Hwy. 12 & Hwy 29.

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

The lease area lies within the landscaped planters and fairway borders on the northwest corner of the existing EVGC property. The EVGC property is located on the east side of South Kelly road, south of Lincoln highway in American Canyon, CA. The proposed wireless telecommunications facility would be situated adjacent to the driving range at the EVGC. A large net, held up by tall wood poles, is located adjacent to the proposed facility to the east, which separates the driving range from the proposed lease area location. Outbuildings used for golf cart storage and maintenance are located the south of proposed lease area. The access road is situated partially on paved soils, and dirt and grass surfaced soils proximal to the proposed lease area.

Land use adjacent to the project site generally consists of the EVGC property to the south and east; and the golf course property bordered by agricultural properties to the north and west. Ornamental trees, shrubs, and grasses occur in the immediate vicinity of the proposed project.

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

The project will require various ministerial approvals by the County and Cal Fire, including but not limited to building permits and grading permits. Water and sewer utility service is provided by the City of American Canyon and Napa Sanitation District, respectively.

11. **Tribal Cultural Resources. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?**

On August 8, 2019, County Staff sent invitations to consult on the proposed project to Native American tribes who had a cultural interest in the area and who as of that date had requested to be invited to consult on projects, in accordance with the requirements of Public Resources Code section 21080.3.1. One response has been received from the Yocha Dehe Wintun Nation requesting a site visit which was conducted on October 21, 2019. Following the site visit, Yocha Dehe provided procedures for the treatment of Native American human remains, grave goods, ceremonial items, and items of cultural patrimony, in the event that any are found in conjunction with development, including archaeological studies, excavation, geotechnical investigations, grading, and any ground disturbing activity. This Protocol also formalizes procedures for Tribal monitoring during archaeological studies, grading, and ground-disturbing activities.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

ENVIRONMENTAL IMPACTS AND BASIS OF CONCLUSIONS:

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

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

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- I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

John McDowell

February 13, 2020

Signature

Date

John McDowell

Name: _____

Napa County Planning, Building and Environmental Services
Department

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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I. **AESTHETICS.** Except as provided in Public Resources Code Section 21099, would the project:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a) Have a substantial adverse effect on a scenic vista? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Discussion:

a-d. According to the Napa County Environmental Resource Maps (based on the following layers – view landforms, ridgelines, scenic road, and scenic corridor) there are no scenic vistas near the project area, however, the project site is located within the designated scenic corridor of State Route 29. The project consists of two wireless telecommunications facilities (AT&T and Sprint) proposed to be of co-located and mounted on a single monopine tower. The antennas will be mounted on two separate towers: AT&T on a 55-foot stealth ‘faux pine’ camouflaged monopine tower, and; Sprint on a 60-foot stealth ‘faux pine’ camouflaged monopine tower. Both carriers will have an additional five feet of faux branches extending above the top of attached antennas resulting in a total height of 55 feet (AT&T) and 60 feet (Sprint) above ground level. The location is adjacent to the north end of the driving range at EVGC. To co-locate both carriers on one monopine tower would require additional height that would result in a substantially taller structure which would be clearly visible above existing tree canopy. The monopine “trees” are designed to fit within the existing setting, including mature conifer, native oaks, and eucalyptus trees and to appear “invisible”. No trees would be removed and the monopine poles would not extend above existing surrounding tree canopy. The nearest private residence is located approximately 138 feet to the west of the proposed Sprint monopine tower. Visual simulations provided by both carriers indicates the monopine towers would not project over existing mature vegetation and would not be easily visible from public viewing areas nor would it present a new visual impact within the designated scenic corridor. The impact is considered less than significant, and no mitigation is required.

The associated telecommunication equipment will be installed within a new 20’ x 15’ fenced ground electronics equipment enclosure area containing 24-hour emergency backup power supply equipment structures. While these equipment areas and monopine towers are a change to the existing area, it is a minor modification and will not substantially degrade the aesthetics of the area and would not be visible from public vantage points.

d. Lighting proposed for this co-located telecommunications facility includes down-shielded technical lighting on the equipment enclosure which should not affect views of the area, nor new source of glare.

Mitigation Measures: None required

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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II. **AGRICULTURE AND FOREST RESOURCES.**¹ Would the project:

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|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Important (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

¹ “Forest land” is defined by the State as “land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and Eagle Vines Telecommunications Tower ATT, Use Permit #P18-00410
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use?				
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land as defined in Public Resources Code Section 12220(g), timberland as defined in Public Resources Code Section 4526, or timberland zoned Timberland Production as defined in Government Code Section 51104(g)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use in a manner that will significantly affect timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, or other public benefits?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

a-e. The project site has an Industrial land use designation in the Napa County General Plan and a AW:AC (Agriculture Watershed/Airport Compatibility) zoning designation. The project site is completely developed with a golf course and some out-buildings and is not Prime Farmland, Unique Farmland or Farmland of Statewide Importance. *The site is designated as "Urban Land (X)," as shown on the Farmland Mapping and Monitoring Program of the California Resources Agency.* As such, there are no significant impacts to prime farmland created by the project. Therefore, the proposed project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. No impacts would occur.

Mitigation Measures: None required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

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d) Result in other emission (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion:

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

The TAC thresholds were challenged in court (*California Building Industry Association v. Bay Area Air Quality Management District* (1st Dist., Div. 5, 2016) 2 Cal.App.5th 1067) because BAAQMD did not conduct CEQA review of their potential environmental impacts. Following litigation in the trial court, the court of appeal, and the California Supreme Court, all of the thresholds were upheld. However, in an opinion issued on December 17, 2015, the California Supreme Court held that CEQA does not generally require an analysis of the impacts of locating development in areas subject to environmental hazards unless the project would exacerbate existing environmental hazards. The Supreme Court also found that CEQA requires the analysis of exposing people to environmental hazards in specific circumstances, including the location of development near airports, schools near sources of toxic contamination, and certain exemptions for infill and workforce housing. The Supreme Court also held that public agencies remain free to conduct this analysis regardless of whether it is required by CEQA.

In view of the Supreme Court's opinion, local agencies may rely on TAC thresholds designed to reflect the impact of locating development near areas of toxic air contamination where such an analysis is required by CEQA or where the agency has determined that such an analysis would assist in making a decision about the project. However, the TAC thresholds are not mandatory and agencies should apply them only after determining that they reflect an appropriate measure of a project's impacts. These Guidelines may inform environmental review for development projects in the Bay Area, but do not commit local governments or BAAQMD to any specific course of regulatory action.

BAAQMD published a new version of the Guidelines dated May 2017, which includes revisions made to address the Supreme Court's opinion. The May 2017 Guidelines update does not address outdated references, links, analytical methodologies or other technical information that may be in the Guidelines or TAC thresholds Justification Report. The Air District is currently working to revise any outdated information in the Guidelines as part of its update to the CEQA Guidelines and thresholds of significance.

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

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

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

BAAQMD has not officially recommended the use of its thresholds in CEQA analyses and CEQA ultimately allows lead agencies the discretion to determine whether a particular environmental impact would be considered significant, as evidenced by scientific or other factual data. BAAQMD also states that lead agencies need to determine appropriate air quality thresholds to use for each project they review based on

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substantial evidence that they include in the administrative record of the CEQA document. One resource BAAQMD provides as a reference for determining appropriate thresholds is the *California Environmental Quality Act Air Quality Guidelines* developed by its staff in 2010 and as updated through May 2017. These guidelines outline substantial evidence supporting a variety of thresholds of significance.

As mentioned above, in 2010, the BAAQMD adopted and later incorporated into its 2011 CEQA Guidelines project screening criteria (Table 3-1 – Operational-Related Criteria Air Pollutant and Precursors Screening Level Sizes) and thresholds of significance for air pollutants, which have now been updated by BAAQMD through May 2017. The proposed telecommunications facility is not listed in the BAAQMD’s operational criteria pollutant screening list and would therefore not significantly impact air quality requiring further study (BAAQMD CEQA Guidelines, May 2017 Pages 3-2 & 3-3.). The project would contribute an insignificant amount of air pollution and would not result in a conflict or obstruction of an air quality plan. Impacts are considered less than significant.

- c. Construction activities would be limited to the proposed improvements which include: 1) Development of two 60-foot (maximum) stealth ‘faux pine’ camouflaged monopine antenna towers; 2) Associated telecommunication equipment will be installed within two new 20’ x 15’ fenced ground electronics equipment enclosure areas containing emergency backup power supply and equipment structures; and 3) Approximately 546 feet of maximum ground disturbance for the installation of the fiber utilities, and 533 feet of maximum ground disturbance for the installation of the power utility connection. During grading and construction activities there would be a minimal amount of air pollutant concentrations and air quality impacts of which would be lessened with utilization of best management practices. The project would not expose sensitive receptors to substantial pollutant concentrations as the nearest sensitive receptor is approximately 206 feet away from the subject site. If the proposed project adheres to these relevant best management practices identified by the Air District and the County’s standard conditions of project approval, construction-related impacts are considered less than significant:

7.1 SITE IMPROVEMENTS

c. AIR QUALITY

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

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

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

7.1 SITE IMPROVEMENTS

b. DUST CONTROL

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

- d. While the Air District defines public exposure to offensive odors as a potentially significant impact, telecommunications facilities are not known

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operational producers of pollutants capable of causing substantial negative impacts to sensitive receptors. There would be minimal construction-phase pollutants and the project would not create pollutant concentrations or objectionable odors affecting a substantial number of people. Impacts are considered less than significant.

Mitigation Measures: None required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES. Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, Coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

A Biological Constraints evaluation was prepared for this property by both applicants (in September 2019 by Environmental Assessment Specialists (EAS) for AT&T and October 2019 by Sentinel Science Inc for Sprint). The reports concluded that trees and shrubs located within the immediate vicinity of the project site provide suitable nesting habitat for several avian species, however, no Burrowing owls or suitable nest burrows were noted during the site inspection. Suitable habitat for nesting birds is also present at the site, particularly within redwood trees near the trench route between the golf cart storage building and the netting on the edge of the driving range. Other trees, shrubs, wood poles, and the ground surface at the site present nesting opportunities for nesting birds.

a-c, e-f. The project area is located within the existing EVGC site. The project site does not contain sensitive biological resources, including suitable habitat for listed threatened or endangered plant and wildlife species. There is no potential for breeding and foraging habitat for special status species and no habitat modifications required as a result of the project. There are no jurisdictional wetlands on the property. The project site is located within an existing golf club area and is developed as such. The site is not located in a designated critical habitat wilderness area or a wildlife preserve. No evidence of wildlife corridors, raptor nests, wildlife dens, burrows or other unique or sensitive biological habitats or resources are located on site. Therefore, there would be no loss of significant wildlife or other sensitive habitat. Implementation of the project does not result in conflict with any County of Napa General Plan policy or ordinance protection vegetation or wildlife. In addition, there are no Habitat Conservation Plans, or other local or state habitat conservation plans that apply to this site.

d. The trees and shrubs located within the immediate vicinity of the project site provide suitable nesting habitat for several avian species. Therefore, as a mitigation measure, MM BIO-1, and a condition of project approval requires that construction activity shall avoid the avian nesting season (February through September). If construction activity shall occur during the nesting season, a qualified biologist shall perform a pre-construction clearance survey to determine the presence/absence of nesting activity near the project site. The survey shall

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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address impacts to nesting birds per the MBTA. If no nesting activity is observed, no further action is required. If nesting activity is observed on or in the immediate vicinity of the project site, construction activity can proceed after the nestlings have fledged. If the facility must be installed near an active nest, a biological monitor shall be present during all construction activity. Construction activity can be conducted at the discretion of the monitor to ensure that it does not directly or indirectly impact nesting birds.

- a. **Mitigation Measure: BIO-1.** For earth-disturbing activities occurring between February 1 and August 31, a qualified biologist (defined as knowledgeable and experienced in the biology and natural history of local avian resources with the potential to occur at the project site) shall conduct a preconstruction surveys for nesting birds within all suitable habitat on the project site, and where there is potential for impacts adjacent to the project areas (typically within 500 feet of project activities). The preconstruction survey shall be conducted no earlier than 14 days prior to when vegetation removal and ground disturbing activities are to commence. Should ground disturbance commence later than 14 days from the survey date, surveys shall be repeated. A copy of the survey shall be provided to the Napa County Conservation Division and the CDFW prior to commencement of work.
- b. After commencement of work if there is a period of no work activity of five days or longer during the bird breeding season, surveys shall be repeated to ensure birds have not established nests during inactivity.
- c. In the event that nesting birds are found, the owner/permittee shall identify appropriate avoidance methods and exclusion buffers in consultation with the County Conservation Division and the U.S. Fish and Wildlife Service (USFWS) and/or CDFW prior to initiation of project activities. Exclusion buffers may vary in size, depending on habitat characteristics, project activities/disturbance levels, and species as determined by a qualified biologist in consultation with County Conservation Division and the USFWS and/or CDFW.
- d. Exclusion buffers shall be fenced with temporary construction fencing (or the like), the installation of which shall be verified by Napa County prior to the commencement of any earthmoving and/or development activities. Exclusion buffers shall remain in effect until the young have fledged or nest(s) are otherwise determined inactive by a qualified biologist.
- e. Alternative methods aimed at flushing out nesting birds prior to preconstruction 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 is prohibited. Any act associated with flushing birds from project areas should undergo consultation with the USFWS/CDFW prior to any activity that could disturb nesting birds.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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V. **CULTURAL RESOURCES.** Would the project:

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|----|--|--------------------------|-------------------------------------|-------------------------------------|--------------------------|
| a) | Cause a substantial adverse change in the significance of a historical resource pursuant to in CEQA Guidelines §15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) | Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines §15064.5? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) | Disturb any human remains, including those interred outside of dedicated cemeteries? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion:

- a. According to the Napa County Environmental Resource Maps (based on the following layers – Historical sites points & lines, Archaeology surveys, sites, sensitive areas, and flags) no historic sites have been identified on the subject property. As per Title 14, California Code of Regulations Section 15064.5, a ‘historical resources’ is listed in, or eligible for listing in, the National Register of Historic Places or the California Register of Historic Resources or listed in a local register of historical resources is determined by the lead agency when supported by substantial evidence, such as a cultural resource evaluation by a qualified or registered architectural historian. No ‘historic resource’ currently exists on the

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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subject site or within the immediate area of the site. However, if resources are found associated with the project, construction of the project is required to cease, and a qualified archaeologist would be retained to investigate the site in accordance with the following standard condition of approval:

7.2 ARCHEOLOGICAL FINDING

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

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

With this recommended condition of project approval, this impact would be less than significant.

- b. The California State Legislature in Assembly 52, effective July 1, 2015, ensures that local and Tribal governments, public agencies, and project proponents would have information available, early in the project planning process, to identify and address potential adverse impacts to tribal cultural resources. The Public Resources Code establishes that "(a) project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment." (Public Resources Code, 21084.2) To help determine whether a project may have such an effect, the Public Resources Code requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. For the proposed project, consultations pursuant to AB 52 were conducted. As such, the Yocha Dehe Wintun Nation responded with a treatment protocol for handling human remains and cultural items affiliated with the Yocha Dehe Wintun Nation should they be discovered during excavation, geotechnical investigations, grading, and any ground disturbing activity.

The proposed project has the potential to impact unknown archaeological resources during grading and construction activities which may result in the discovery of unknown cultural resources that are buried beneath the ground surface. To reduce this potentially significant impact to a less than significant level, all construction related impacts of soil shall be monitored in accordance with Mitigation Measure CULT-1:

MM CULT-1 If any prehistoric or historic subsurface cultural resources are discovered during ground-disturbing activities, all work within 50 feet of the resources shall be halted and a qualified archaeologist shall be consulted to assess the significance of the find according to CEQA Guidelines Section 15064.5. If any find is determined to be significant, representatives from the County and the archaeologist shall meet to determine the appropriate avoidance measures or other appropriate mitigation. All significant cultural materials recovered shall be, as necessary and at the discretion of the consulting archaeologist, subject to scientific analysis, professional museum curation, and documentation according to current professional standards. In considering any suggested mitigation proposed by the consulting archaeologist to mitigate impacts to historical resources or unique archaeological resources, the County shall determine whether avoidance is necessary and feasible in light of factors such as the nature of the find, project design, costs, and other considerations.

If avoidance is infeasible, other appropriate measures (e.g. data recovery) shall be instituted. Work may proceed on the other parts of the project site while mitigation for historical resources or unique archaeological resources is being carried out.

Mitigation Measure CULT-1 is included in this analysis as a way to protect unknown cultural resources that could be buried underneath the ground surface and would not be discovered until grading activities commenced for the proposed project. If no cultural resources are found during construction, none of the actions described in MM CULT-1 are required.

In the event that Native American human remains, grave goods, ceremonial items, and items of cultural patrimony are found in conjunction with development, including archaeological studies, excavation, geotechnical investigations, grading, and any ground disturbing activity, the treatment procedures prepared by the Yocha Dehe Wintun Nation shall be followed, and are described in MM CULT-2.

MM CULT-2: Whenever Native American human remains are found during the course of a Project, the determination of Most Likely Descendant ("MLD") under California Public Resources Code Section 5097.98 will be made by the Native American Heritage Commission ("NAHC") upon notification to the NAHC of the discovery of said remains at a Project site. If the location of the site and the history and prehistory of the area is culturally-affiliated with the Tribe, the NAHC contacts the Tribe; a Tribal member will be designated by the Tribe to consult with the landowner and/or project proponents.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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Should the NAHC determine that a member of an Indian tribe other than Yocha Dehe Wintun Nation is the MLD, and the Tribe is in agreement with this determination, the terms of this Protocol relating to the treatment of such Native American human remains shall not be applicable; however, that situation is very unlikely.

Treatment of Native American Remains

In the event that Native American human remains are found during development of a Project and the Tribe or a member of the Tribe is determined to be MLD pursuant to Section II of this Protocol, the following provisions shall apply. The Medical Examiner shall immediately be notified, ground disturbing activities in that location shall cease and the Tribe shall be allowed, pursuant to California Public Resources Code Section 5097.98(a), to (1) inspect the site Yocha Dehe Wintun Nation *PO Box 18 Brooks, California 95606 p) 530.796.3400 f) 530.796.2143 www.yochadehe.org* of the discovery and (2) make determinations as to how the human remains and grave goods should be treated and disposed of with appropriate dignity.

The Tribe shall complete its inspection and make its MLD recommendation within forty-eight (48) hours of getting access to the site. The Tribe shall have the final determination as to the disposition and treatment of human remains and grave goods. Said determination may include avoidance of the human remains, reburial on-site, or reburial on tribal or other lands that will not be disturbed in the future. The Tribe may wish to rebury said human remains and grave goods or ceremonial and cultural items on or near the site of their discovery, in an area which will not be subject to future disturbances over a prolonged period of time. Reburial of human remains shall be accomplished in compliance with the California Public Resources Code Sections 5097.98(a) and (b).

The term "human remains" encompasses more than human bones because the Tribe's traditions call for the burial of associated cultural items with the deceased (funerary objects), and/or the ceremonial burning of Native American human remains, funerary objects, grave goods and animals. Ashes, soils and other remnants of these burning ceremonies, as well as associated funerary objects and unassociated funerary objects buried with or found near the Native American remains are to be treated in the same manner as bones or bone fragments that remain intact.

Non-Disclosure of Location of Reburials

Unless otherwise required by law, the site of any reburial of Native American human remains shall not be disclosed and will not be governed by public disclosure requirements of the California Public Records Act, Cal. Govt. Code § 6250 et seq. The Medical Examiner shall withhold public disclosure of information related to such reburial pursuant to the specific exemption set forth in California Government Code Section 6254(r). The Tribe will require that the location for reburial is recorded with the California Historic Resources Inventory System ("CHRIS") on a form that is acceptable to the CHRIS center. The Tribe may also suggest that the landowner enter into an agreement regarding the confidentiality of site information that will run with title on the property.

Treatment of Cultural Resources

Treatment of all cultural items, including ceremonial items and archeological items will reflect the religious beliefs, customs, and practices of the Tribe. All cultural items, including ceremonial items and archeological items, which may be found at a Project site should be turned over to the Tribe for appropriate treatment, unless otherwise ordered by a court or agency of competent jurisdiction. The Project Proponent should waive any and all claims to ownership of Yocha Dehe Wintun Nation *PO Box 18 Brooks, California 95606 p) 530.796.3400 f) 530.796.2143 www.yochadehe.org* Tribal ceremonial and cultural items, including archeological items, which may be found on a Project site in favor of the Tribe. If any intermediary, (for example, an archaeologist retained by the Project Proponent) is necessary, said entity or individual shall not possess those items for longer than is reasonably necessary, as determined solely by the Tribe.

Inadvertent Discoveries

If additional significant sites or sites not identified as significant in a Project environmental review process, but later determined to be significant, are located within a Project impact area, such sites will be subjected to further archeological and cultural significance evaluation by the Project Proponent, the Lead Agency, and the Tribe to determine if additional mitigation measures are necessary to treat sites in a culturally appropriate manner consistent with CEQA requirements for mitigation of impacts to cultural resources. If there are human remains present that have been identified as Native American, all work will cease for a period of up to 30 days in accordance with Federal Law.

- c. Site modifications are proposed as part of the project with site disturbance to install the power utility connection. To date, no human remains would occur on the property and no information has been encountered that would indicate that this project would encounter human remains. However, if resources are found during project grading, construction of the project is required to cease, and a qualified archaeologist would be retained to investigate the site in accordance with standard condition of approval noted above. Impacts would be less than significant.

State CEQA Guidelines Section 15064.5 (e) requires that excavation activities be stopped whenever human remains are uncovered and that the county coroner be called in to assess the remains. If the county coroner determines that the remains are those of Native Americans, the

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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Native American Heritage Commission must be contacted within 24 hours. At that time, the lead agency must consult the appropriate Native Americans, if any, as timely identified by the Native American Heritage Commission. Section 15064.5 directs the lead agency (or applicant), under certain circumstances to develop an agreement with the Native Americans for the treatment and disposition of the remains.

In addition to the mitigation provisions pertaining to accidental discovery of human remains, the State CEQA Guidelines also require that a lead agency make provisions for the accidental discovery of historical or archaeological resources, generally. Pursuant to Section 15064.5, subdivision (f), these provisions should include "an immediate evaluation of the find by a qualified archaeologist. If the find is determined to be an historical or unique archaeological resource, contingency funding and a time allotment sufficient to allow for implementation of avoidance measures or appropriate mitigation should be available. Work could continue on other parts of the building site while historical or unique archaeological resource mitigation takes place."

The mitigation measure proposed in CULT-3 is included in this analysis to reduce and minimize potential impacts on human remains should they be discovered during construction activity.

MM CULT-3 If human skeletal remains are uncovered during construction, the construction contractor shall immediately halt work within 50 feet of the find, contact the Napa County Coroner to evaluate the remains, and follow the procedures and protocols set forth in Section 15064.5(e)(1) of the CEQA Guidelines. If the County Coroner determines that the remains are Native American, the project applicant shall contact the Native American Heritage Commission, in accordance with Health and Safety Code Section 7050.5, subdivision (c), and Public Resources Code 5097.98 (as amended by AB 2641). Per Public Resources Code 5097.98, the construction contractor shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the human remains are located, is not damaged or disturbed by further development activity until the project applicant has discussed and conferred, as prescribed in section (California Public Resources Code Section 5097.98), with the most likely descendants regarding their recommendations, if applicable, taking into account the possibility of multiple human remains.

No known human remains have been identified onsite, however, this mitigation measure is included as a way to protect previously undiscovered human remains that could be buried underneath the ground surface and would not be discovered until grading activities commenced for the proposed project. If no human remains are found during construction, none of the actions described in CULT-3 are required. For these reasons, potential impacts are considered less than significant with mitigation incorporated.

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

Discussion:

a-b. The project applicants included in the applications radio frequency exposure studies regarding the proposed telecommunications facilities. The Sprint study indicated that for a person anywhere at ground, the maximum RF exposure level due to the proposed Sprint operation by itself, including the contribution of the microwave antenna, is calculated to be 0.015 mW/cm², which is 1.6% of the applicable public exposure limit. The maximum calculated level at the second-floor elevation of any nearby building* is 0.65% of the public limit. The maximum calculated level at the second-floor elevation of any nearby residence† is 0.38% of the public exposure limit. It should be noted that these results include several "worst-case" assumptions and therefore are expected to overstate actual power density levels.

The AT&T study indicated that power density decreases significantly with distance from any antenna. The panel-type antennas to be employed at this site are highly directional by design and the orientation in azimuth and mounting elevation, as documented, serves to reduce the potential to exceed MPE limits at any location other than directly in front of the antennas. For accessible areas at ground level, the maximum predicted power density level resulting from all AT&T Mobility operations is 2.2446% of the FCC General Population limits. Incident at adjacent buildings

Potentially Significant Impact Less Than Significant With Mitigation Incorporation Less Than Significant Impact No Impact

(depicted in Figure 1 of the study), the maximum predicted power density level resulting from all AT&T Mobility operations is 0.8524% of the FCC General Population limits. The proposed operation will not expose members of the General Public to hazardous levels of RF energy and will not contribute to existing cumulative MPE levels on walkable surfaces at ground or in adjacent buildings by 5% of the General Population limits.

Due to their mounting location and height, the antennae would not be accessible to unauthorized persons, and so no mitigation measures are necessary to comply with the FCC public exposure guidelines. It is presumed that both telecommunications facilities will, as an FCC licensee take adequate steps to ensure that its employees or contractors receive appropriate training and comply with FCC occupational exposure guidelines whenever work is required near the antennas themselves.

The project will comply with the prevailing standards for limiting public exposure to radio frequency energy and, therefore, will not for this reason cause a significant impact on the environment. The highest calculated level in publicly accessible areas is much less than the prevailing standards allow for exposures of unlimited duration. This finding is consistent with measurements of actual exposure conditions taken at other operating base stations. As a condition of project approval, the applicants shall post RF alerting signage with contact information (Caution 2B) at the base of the Monopine to inform authorized climbers of potential conditions near the antennas. Therefore, these impacts would be considered less than significant.

Additionally, as a condition of project approval, the applicant would be required to utilize Best Management Practices during grading, trenching and construction activities as well as during operational practices. Furthermore, as discussed in the **Section III Air Quality** of this Initial Study above, Napa County has been working to develop a Climate Action Plan (CAP). Information on the County CAP can be obtained at the Napa County Department of Planning, Building and Environmental Services or <http://www.countyofnapa.org/CAP/>. Compliance with the Napa County CAP would further reduce the project's energy usage. Energy would be consumed during the operational phase of the project.

In addition, vehicle trips associated during operation would consume gasoline when employees would visit and monitor the site approximately once a month. Adherence to policies outlined in the County CAP would ensure reduced energy use during operations would not be inefficient, and would result in a less than significant impact.

Compliance with the County CAP Building Energy Use measures, the California Building Code, and Best Management Practices would further reduce emissions and ensure no overall environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. Therefore, these impacts would be considered less than significant.

Mitigation Measures: None required.

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

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on expansive soil creating substantial direct or indirect risks to life or property? Expansive soil is defined as soil having an expansive index greater than 20, as determined in accordance with ASTM (American Society of Testing and Materials) D 4829.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion: The project has been reviewed by Department of Public Works, Engineering and Building. As such, all construction shall conform with all appropriate construction codes and Best Management Practices.

- a.
 - i.) There are no known faults on the project site as shown on the most recent Alquist-Priolo Earthquake Fault Zoning Map. As such, the proposed project would result in no impact with regards to rupturing a known fault.
 - ii.) All areas of the Bay Area are subject to strong seismic ground shaking. Construction of the project would be required to comply with the latest building standards and codes, including the California Building Code that would reduce any potential impacts to a less than significant level.
 - iii.) No subsurface conditions have been identified on the project site that indicated a susceptibility to seismic-related ground failure or liquefaction. As the project involves a minimal physical change to the site, there would be a less than significant impact in regards to seismic related ground-failure and liquefaction.
 - iv.) According to the Napa County Environmental Resource Maps (Landslides line, polygon, and geology layers) there are no known landslide areas within the area of the subject site proposed for the telecommunications facilities. Therefore, there would be no impact.

b/c/d. The project would require incorporation of best management practices during operations and would be subject to the Napa County Stormwater Ordinance, as applicable. As there is minimal physical change occurring on-site as a result of the project, there would be less than significant no impacts related to soil erosion or loss of topsoil.

e. As the proposed telecommunications facility does not propose septic tanks or alternative disposal of wastewater, there would be no impact related to soils capable of disposal of wastewater, and no mitigation would be required.

f. As discussed in **Section VII(a)(ii)** above, the proposed Project shall comply with the latest building standards and codes, including the California Building Code. The final building permit plan set shall be submitted to the City Engineer for review and approval. However, paleontological resources could be encountered when excavation occurs in previously undisturbed soil and bedrock.

The implementation of the following Mitigation Measure GEO-1, which requires that excavation activities be halted should a paleontological resource be encountered and the curation of any substantial find, would reduce this impact to a less-than significant level.

Mitigation Measures:

GEO-1: Should paleontological resources be encountered during project subsurface construction activities located in previously undisturbed soil and bedrock, all ground-disturbing activities within 25 feet shall be halted and a qualified paleontologist contacted to assess the situation, consult with agencies as appropriate, and make recommendations for the treatment of the discovery. For purposes of this mitigation, a "qualified paleontologist" shall be an individual with the following qualifications: 1) a graduate degree in paleontology or geology and/or a person with a demonstrated publication record in peer-reviewed paleontological journals; 2) at least two years of professional experience related to paleontology; 3) proficiency in recognizing fossils in the field and determining their significance; 4) expertise in local geology, stratigraphy, and biostratigraphy; and 5) experience collecting vertebrate fossils in the field.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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If the paleontological resources are found to be significant and project activities cannot avoid them, measures shall be implemented to ensure that the project does not cause a substantial adverse change in the significance of the paleontological resource. Measures may include monitoring, recording the fossil locality, data recovery and analysis, a final report, and accessioning the fossil material and technical report to a paleontological repository. Upon completion of the assessment, a report documenting methods, findings, and recommendations shall be prepared and submitted to the County for review. If paleontological materials are recovered, this report also shall be submitted to a paleontological repository such as the University of California Museum of Paleontology, along with significant paleontological materials. Public educational outreach may also be appropriate.

The Project sponsor shall inform its contractor(s) of the sensitivity of the project site for paleontological resources and shall verify that the following directive has been included in the appropriate contract specification documents:

"The subsurface of the construction site may contain fossils. If fossils are encountered during project subsurface construction, all ground-disturbing activities within 25 feet shall be halted and a qualified paleontologist contacted to assess the situation, consult with agencies as appropriate, and make recommendations for the treatment of the discovery. Project personnel shall not collect or move any paleontological materials. Fossils can include plants and animals, and such trace fossil evidence of past life as tracks or plant imprints. Marine sediments may contain invertebrate fossils such as snails, clam and oyster shells, sponges, and protozoa; and vertebrate fossils such as fish, whale, and sea lion bones. Vertebrate land mammals may include bones of mammoth, camel, saber tooth cat, horse, and bison. Contractor acknowledges and understands that excavation or removal of paleontological material is prohibited by law and constitutes a misdemeanor under California Public Resources Code, Section 5097.5."

Mitigation Measures: None required

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

Discussion:

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

In July 2015, the County re-commenced preparation of the CAP to: i) account for present day conditions and modeling assumptions (such as but not limited to methods, emission factors, and data sources), ii) address the concerns with the previous CAP effort as outlined above, iii) meet applicable State requirements, and iv) result in a functional and legally defensible CAP. On April 13, 2016 the County, as the part of the first phase of development and preparation of the CAP, released Final Technical Memorandum #1: 2014 Greenhouse Gas Emissions Inventory and Forecast, April 13, 2016. This initial phase included: i) updating the unincorporated County's community-wide GHG emissions inventory to 2014, and ii) preparing new GHG emissions

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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forecasts for the 2020, 2030, and 2050 horizons. Additional information on the County CAP can be obtained at the Napa County Department of Planning, Building and Environmental Services or <http://www.countyofnapa.org/CAP/>.

a/b. Overall increases in Greenhouse Gas (GHG) emissions in Napa County were assessed in the Environmental Impact Report (EIR) prepared for the Napa County General Plan Update and certified in June 2008. GHG emissions were found to be significant and unavoidable in that document, despite the adoption of mitigation measures incorporating specific policies and action items into the General Plan.

Consistent with these General Plan action items, Napa County participated in the development of a community-wide GHG emissions inventory and "emission reduction framework" for all local jurisdictions in the County in 2008-2009. This planning effort was completed by the Napa County Transportation and Planning Agency in December 2009, and served as the basis for development of a refined inventory and emission reduction plan for unincorporated Napa County.

In 2011, the Bay Area Air Quality Management District (BAAQMD) released California Environmental Quality Act (CEQA) Project Screening Criteria and Significance of Thresholds [1,100 metric tons per year (MT) of carbon dioxide and carbon dioxide equivalents (CO₂e)]. This threshold of significance is appropriate for evaluating projects in Napa County.

During the ongoing planning effort, the County requires project applicants to consider methods to reduce GHG emissions consistent with Napa County General Plan Policy CON-65(e). (Note: Pursuant to State CEQA Guidelines Section 15183, because this initial study assesses a project that is consistent with an adopted General Plan for which an environmental impact report (EIR) was prepared, it appropriately focuses on impacts which are "peculiar to the project," rather than the cumulative impacts previously assessed.)

GHGs are the atmospheric gases whose absorption of solar radiation is responsible for the greenhouse effect, including carbon dioxide, methane, ozone, and the fluorocarbons, that contribute to climate change (a widely accepted theory/science explain human effects on the atmosphere). Carbon Dioxide (CO₂) gas, the principal greenhouse gas (GHG) being emitted by human activities, and whose concentration in the atmosphere is most affected by human activity, also serves as the reference gas to compare other greenhouse gases. Agricultural sources of carbon emissions include forest clearing, land-use changes, biomass burning, and farm equipment and management activity emissions (http://www.climatechange.ca.gov/glossary/letter_c.html). Equivalent Carbon Dioxide (CO₂e) is the most commonly reported type of GHG emission and a way to get one number that approximates total emissions from all the different gasses that contribute to GHG (BAAQMD CEQA Air Quality Guidelines, May 2017). In this case, carbon dioxide (CO₂) is used as the reference atom/compound to obtain atmospheric carbon CO₂ effects of GHG. Carbon stocks are converted to carbon dioxide equivalents (CO₂e) by multiplying the carbon total by 44/12 (or 3.67), which is the ratio of the atomic mass of a carbon dioxide molecule to the atomic mass of a carbon atom (<http://www.nciasi2.org/COLE/index.html>).

The "construction emissions" would be limited to the construction employees travelling to the site, creation, construction and installation proposed improvements which include: 1) Two stealth 'faux pine' camouflaged monopines, ; 2) Associated telecommunication equipment will be installed within two new 20' x 15' fenced ground electronics equipment enclosure areas containing emergency backup power supply; and 3) Approximately 546 feet of maximum ground disturbance for the installation of the fiber utilities, and 533 feet of maximum ground disturbance for the installation of the power utility connection. These emissions associated with this project are minimal and result in a less than significant impact.

As discussed in **Section III: Air Quality** of this Initial Study, in 2010, the BAAQMD adopted and later incorporated into its 2011 CEQA Guidelines project screening criteria (Table 3-1 – Criteria Air Pollutants and Precursors & GHG Screening Level Sizes) and thresholds of significance for air pollutants, including GHG emissions, which have now been updated by BAAQMD through May 2017. As discussed above, the proposed project would not exceed the 1,100 MT/yr of CO₂e as the project does not involve a site modification or operational usage that meets criteria for emissions generating uses. Although, the co-located telecommunications facility would generate periodic vehicular trips for management and maintenance, the project would fall below the BAAQMD thresholds, and the impact is considered less than significant.

Mitigation Measures: None required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
IX. HAZARDS AND HAZARDOUS MATERIALS. Would the project				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

- a. The proposed project would not involve the transport of hazardous materials. No impacts would occur.
- b. The proposed project consists of construction and installation of two wireless telecommunications facilities (AT&T and Sprint on individual monopines). The antennas will be mounted on a two stealth 'faux pine' camouflaged monopines, The faux branches on the two towers would extend the height an additional 5-feet above the top of antennas resulting in a total height of 55 feet for AT&T and 60 feet for Sprint above ground level. Additionally, the associated telecommunication equipment will be installed within two new 20' x 15' fenced ground electronics equipment enclosure areas containing 24 hour emergency backup power supply and associated equipment structures. Approximately 546' of maximum ground disturbance will be required for the installation of the fiber utilities, and 533' of maximum ground disturbance will be required for the installation of the power utility connection. Hazardous materials such as diesel, maintenance fluids, and paints would be used onsite during construction. Should they be stored onsite, these materials would be stored in secure locations to reduce the potential for upset or accident conditions. The proposed project consists of installation of solar arrays which would not be expected to use any substantial quantities of hazardous materials. Therefore, it would not be reasonably foreseeable for the proposed project to create upset or accident conditions that involve the release of hazardous materials into the environments. Impact are considered less than significant, and no mitigation is required.
- c. According to Google Earth, the nearest school to the project site is Napa Junction Magnet Elementary School to the south, located approximately 2.8 miles from the site. However, as stated in **Section VIII (b)** above, the operational use of the project would not include hazardous materials or substances. Therefore, the impacts would be considered less than significant, and no mitigation would be required.
- d. Based on a search of the California Department of Toxic Substances Control database, the project site does not contain any known EPA National Priority List sites, State response sites, voluntary cleanup sites, or any school cleanup sites. No impact would occur as the project site is not on any known list of hazardous materials sites.
- e. The project site is approximately 1.6 miles east of the Napa County Airport, and is therefore subject to the requirements of the County's Airport Compatibility Combination zoning district and the requirements of the Napa County Airport Land Use Compatibility Plan (ALUCP). The project site is located within compatibility Zone D of the Napa County Airport, which is a Common Traffic Pattern zone with aircraft overflight between 1,000 feet above the ground to as low as 300 feet above ground level. Zone D areas are routinely overflown by aircraft operating to and from the airport with frequent single-event noise intrusion. Overflights in these areas can range from near the traffic pattern altitude (about. Accident risk varies from low to moderate. As such, persons on the project site will be exposed to noise from the regular aircraft overflight, however, the passive nature of the proposed project would not require on-site employees on a daily basis. No lighting is proposed as part of the

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Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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telecommunication monopine towers. County development regulations have been certified as meeting ALUC compatibility requirements, and consequently the project is not subject to separate ALUC review because it has been designed to comply with County airport compatibility land use requirements.

- f. The proposed project has been reviewed by the Napa County PBES Engineering and Public Works departments. The existing access driveway would continue to serve the project and meets Napa County Road and Street Standards. Therefore, the project would not obstruct emergency vehicle access. The project has been reviewed by the County Fire Department and Engineering Services Division and found acceptable, as conditioned.
- g. The project would not increase exposure of people and/or structures to a significant loss, injury or death involving wild land fires. The project would comply with current California Department of Forestry and California Building Code requirements for fire safety. No impacts would occur.

Mitigation Measures: None required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted?)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(i) result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or substantial groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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Discussion:

On January 14, 2014, Governor Jerry Brown declared a drought emergency in the state of California. That declaration was followed up on April 1, 2015, when the Governor directed the State Water Resources Control Board to implement mandatory water reductions in cities and town across California to reduce water usage by 25 percent. These water restrictions do not apply to agricultural users. However, on April 7, 2017, Governor Jerry Brown signed an executive order lifting California’s drought emergency in all but four counties (Fresno, Kings, Tulare and Tuolumne). The County of Napa had not adopted or implemented any additional mandatory water use restrictions. The County requires all Use Permit applicants to complete necessary water analyses in order to document that sufficient water supplies are available for the proposed project and to implement water saving measures to prepare for periods of limited water supply and to conserve limited groundwater resources.

- a. The project would not violate any water quality standards or waste discharge requirements nor substantially deplete local groundwater supplies. The proposed project will continue to discharge into an approved storm drainage system designed to accommodate the drainage from the site. Given the essentially level terrain, and the County’s Best Management Practices, which comply with RWQCB requirements, the project does not have the potential to significantly impact water quality and discharge standards.
- b. The project is within the City of American Canyon service area district but does not propose to use any groundwater nor require water service for operation of the telecommunications facilities. For this reason, the proposed project would not use any groundwater resources or lower the local groundwater table. The project would minimally increase the amount of impervious area on the project site. Therefore, the project would have no significant impact on groundwater recharge.
- c (i-iv). The proposed project would not substantially alter the existing drainage patterns of the site or vicinity. As the proposed project is a minor physical change to the site, it would not result in an impact to substantially alter the drainage pattern on site or cause a significant increase in erosion or siltation on or off the project site. Napa County Engineering Division reviewed the project and indicated there is no impact.
- d. The parcel is not located in an area that is subject to flood hazards, tsunamis, or seiches, and would not be at risk of releasing pollutants due to inundation. No impacts would occur.
- e. The proposed modification does not include development of that will impede or redirect flood flows and will not obstruct implementation of a water quality control plan or substantial groundwater management plan. No impacts would occur.

Mitigation Measures: None required.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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XI. LAND USE AND PLANNING. Would the project:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Physically divide an established community? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Discussion:

- a-b. The project would not occur within an established community, nor would it result in the division of an established community.

The project complies with the Napa County Code and all other applicable regulations. The proposed project complies with the Napa County General Plan, the Napa County Zoning Ordinance, applicable County Code sections, and all other applicable regulations. There are no habitat conservation plans or natural community conservation plans applicable to the property. Therefore, the project results in no impact.

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Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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Mitigation Measures: None required.

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

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|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Discussion:

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

Mitigation Measures: None required.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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XIII. NOISE. Would the project result in:

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|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Discussion:

a/b. The project would result in a temporary increase in noise levels as there would be site grading and construction activities for the proposed project. As such, the project would result in temporary construction noise impacts, though minimal given the location adjacent to the golf course, and no operational impacts. This project is anticipated to take up to three months for grading and construction activities to be completed. Therefore, the project would not result in long-term significant construction noise impacts. The project would be conditioned to comply with the Napa County Noise Ordinance (N.C.C. Chapter 8.16). As such, the proposed project would not result in long-term significant construction noise impacts. Conditions of approval identified below would require construction activities to be limited to daylight hours, vehicles to be muffled, and backup alarms adjusted to the lowest allowable levels. Impacts would be less than significant.

7.3. CONSTRUCTION NOISE

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Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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Construction noise shall be minimized to the greatest extent practical and feasible under State and local safety laws, consistent with construction noise levels permitted by the General Plan Community Character Element and the County Noise Ordinance. Construction equipment muffling and hours of operation shall be in compliance with the County Code. Equipment shall be shut down when not in use. Construction equipment shall normally be staged, loaded, and unloaded on the project site, if at all practicable. If project terrain or access road conditions require construction equipment to be staged, loaded, or unloaded off the project site (such as on a neighboring road or at the base of a hill), such activities shall only occur daily between the hours of 8 am to 5 pm.

- c. The proposed project site is located within compatibility Zone D of the Napa County Airport, which is a Common Traffic Pattern zone with aircraft overflight between 1,000 feet above the ground to as low as 300 feet above ground level. Zone D areas are routinely overflown by aircraft operating to and from the airport with frequent single-event noise intrusion. Overflights in these areas can range from near the traffic pattern altitude. As such, persons on the project site will be exposed to noise from the regular aircraft overflight, however, no daily employees are required to operate the facilities. The Napa County Zoning Code, section 8.16.070, Exterior noise levels, lists the maximum allowable level for industrial areas as 75 dBA. Based on the County General Plan Community Character Element, figure CC-1: Napa County Airport Projected Noise Levels (dBA CNEL), the project site is located outside of the airport area projects of 60 dBA or less, which is less than the maximum allowed in the Industrial area. The nature of the uses allowed in the Agricultural Watershed: Airport Compatibility (AW:AC) zoning is not sensitive to increased noise levels from aircraft, and is considered compatible with aircraft operations. Therefore, the location of the project within the airport land use area will result in a less than significant impact on people working in the project area.

Mitigation Measures: None required.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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XIV. POPULATION AND HOUSING. Would the project:

- | | | | | | |
|----|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) | Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) | Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Discussion:

a/b/c. The proposed project is located on the existing EVGC property area. The project would be visited by one or two employees approximately once a month to monitor and provide maintenance to the wireless telecommunications facility. As this is a minimal amount of employees, it would not substantially increase the number of jobs in the area and it is considered to be relatively small compared to the overall area and nearby communities. Therefore, this increase in jobs will not contribute to a cumulatively considerable increase in the demand for housing units within Napa County and the general vicinity and impact to population and housing would occur. There are no existing homes, on or adjacent to, the project site. The project would not result in the displacement of any housing units or people.

Mitigation Measures: None required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
XV. PUBLIC SERVICES. Would the project result in:				
a) Substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
v) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

- a. Public services are currently provided to the project area and the additional demand placed on existing services as a result of the proposed project would be minimal. The Fire Department and Engineering Services Division have reviewed the application and recommend approval, as conditioned. The proposed project would have minimal impact on public parks as no residences are proposed. No impacts to public services occur.

Mitigation Measures: None required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
XVI. RECREATION. Would the project:				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

- a. The project would result in no increase in use of existing parks or recreational facilities based on the project's limited scope. Therefore, no impacts related to recreation would occur.
- b. No recreational facilities are proposed as part of the project. Therefore, no impact would occur.

Mitigation Measures: None required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
XVI. TRANSPORTATION. Would the project:				
a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system and/or conflict with General Plan Policy CIR-16, which seeks to maintain an adequate Level of Service (LOS) at signalized and unsignalized intersections, or reduce the effectiveness of existing transit services or pedestrian/bicycle facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a geometric design feature, (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with General Plan Policy CIR-23, which requires new uses to meet their anticipated parking demand, but to avoid providing excess parking which could stimulate unnecessary vehicle trips or activity exceeding the site's capacity?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

a/b/c. Weekday traffic volumes within the project vicinity consist primarily of commute traffic within the peak traffic periods, with residential flows from nearby communities and commercial, tourist, and industrial park traffic occurring throughout the day. Southern Napa County is characterized by two distinct commute traffic patterns a Napa to Bay Area commute and a Solano County to Napa commute. The existing traffic congestion and potential cumulative impacts are primarily the result of regional growth impacts.

The Metropolitan Transportation Commission (MTC) serves as the transportation planning, coordinating and financing agency for the nine-county San Francisco Bay Area. The MTC created and maintains the Metropolitan Transportation System (MTS), a multimodal system of highways, major arterials, transit service, rail lines, seaports and airports. MTS facilities within the vicinity of the project site include State Routes 12, 29, 121, and 221, and Airport Boulevard. The State routes are maintained and operated by the California Department of Transportation (Caltrans.) The MTS is incorporated into MTC's 2001 Regional Transportation Plan (RTP), and is used as a guideline in prioritizing for planning and funding of facilities in the Bay Area.

Major improvements to both Highway 29 and Highway 12 are necessary to address existing and cumulative regional traffic congestion. The RTP and the Napa County General Plan 2008 update identify roadway improvements in South Napa County to address potential cumulative impacts. These improvements include construction of a flyover ramp at SR 12/29/221 intersection, construction of a new interchange at SR 12/Airport Blvd/SR 29 intersection, widening Jamieson Canyon (SR 12) to four lanes (recently completed), widening SR 29 to six lanes between south Airport Blvd and the south County line (in coordination with the City of American Canyon), and extending Devlin Road south to Green Island Road. These improvements are not yet fully funded, except as noted above, but are expected to be in place by 2030 addressing potential cumulative impacts in the southern part of the County.

As the project will generate minimal traffic trips, only one or two trips per month, the project is not expected to cause a traffic impact.

d/e. The project consists of installation of wireless telecommunications facilities for AT&T and Sprint proposed to be mounted on two monopine antenna towers. Additional, associated telecommunication equipment will be installed within two new 20' x 15' fenced ground electronics equipment enclosure areas containing 24-hour emergency backup power supply and equipment structures. Approximately 546 feet of maximum ground disturbance will be required for the installation of the fiber utilities, and 533 feet of maximum ground disturbance will be required for the installation of the power utility connection. The towers are proposed immediately north and west of the golf course driving

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range approximately 500 feet southeast of the corner of South Kelly Road and State Route 12/29. The wireless telecommunications facilities would be connected to power and telecommunications connections via underground trench to subsurface connections to the south. Both facilities would be accessed by an access road from the south.

- f. Fifty-seven (57) parking spaces are provided at the EVGC site, in which includes 52 standard parking and 5 Americans with Disabilities Act (ADA) accessible standard spaces and 5 ADA accessible van spaces. The proposed use is not expected to employ additional employees as an existing employee or two would visit the site for maintenance and service once or twice a month. Therefore, the project will not result in inadequate parking and there is no impact.

Mitigation Measures: None required.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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XVIII. TRIBAL CULTURAL RESOURCES. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- | | | | | |
|--|--------------------------|-------------------------------------|--------------------------|--------------------------|
| a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion:

a/b. According to the Napa County Environmental Resource Maps (based on the following layers – Historical sites points & lines, Archaeology surveys, sites, sensitive areas, and flags) no historic sites or tribal resources have been identified on the property. Invitation for tribal consultation was completed in accordance with Public Resources Code Section 21080.3.1. On August 7, 2019, County Staff sent invitations to consult on the proposed project to Native American tribes who had a cultural interest in the area and who as of that date had requested to be invited to consult on projects, in accordance with the requirements of Public Resources Code section 21080.3.1. As of the preparation of this environmental assessment, only one response has been received from the Yocha Dehe Wintun Nation requesting a site visit and copy of the cultural resource study and historical resources study and a site visit was conducted on October 24, 2019. Subsequent to the site visit, the Tribe provided procedures in the event of a discovery providing procedures for the treatment of Native American human remains, grave goods, ceremonial items, and items of cultural patrimony. Should any resources not previously uncovered during this prior disturbance are found associated with the proposed project, a qualified archaeologist must be retained to investigate the site in accordance with the standard county conditions of approval. Site modifications are proposed as part of the project with site disturbance to install the power utility connection. To date, no human remains would occur on the property and no information has been encountered that would indicate that this project would encounter human remains. However, if resources are found during project grading, construction of the project is required to cease, and a qualified archaeologist would be retained to investigate the site in accordance with standard condition of approval noted above. Impacts would be less than significant.

State CEQA Guidelines Section 15064.5 (e) requires that excavation activities be stopped whenever human remains are uncovered and that the county coroner be called in to assess the remains. If the county coroner determines that the remains are those of Native Americans, the Native American Heritage Commission must be contacted within 24 hours. At that time, the lead agency must consult the appropriate Native

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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Americans, if any, as timely identified by the Native American Heritage Commission. Section 15064.5 directs the lead agency (or applicant), under certain circumstances to develop an agreement with the Native Americans for the treatment and disposition of the remains.

In addition to the mitigation provisions pertaining to accidental discovery of human remains, the State CEQA Guidelines also require that a lead agency make provisions for the accidental discovery of historical or archaeological resources, generally. Pursuant to Section 15064.5, subdivision (f), these provisions should include "an immediate evaluation of the find by a qualified archaeologist. If the find is determined to be an historical or unique archaeological resource, contingency funding and a time allotment sufficient to allow for implementation of avoidance measures or appropriate mitigation should be available. Work could continue on other parts of the building site while historical or unique archaeological resource mitigation takes place."

In the event that Native American human remains, grave goods, ceremonial items, and items of cultural patrimony any are found during earth disturbing activities, construction of the project would be required to cease and the appropriate individuals contacted in accordance with standard conditions of approval and Mitigation Measure CULT-1, CULT-2, CULT-3 and GEO-1, as noted above in **Section V: Cultural Resources** and **Section VII: Geology and Soils**.

Mitigation Measures: Implementation of CULT-1, CULT-2, CULT-3 and GEO-1 above.

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

Discussion:

a/b. The project would not require the relocation or construction of a new or expanded water, wastewater treatment or storm water drainage, and natural gas, although, but would add electric power and telecommunications facilities as a result of the project. The project would not exceed wastewater treatment requirements of the Regional Water Quality Control Board and would not result in a significant impact on the environment relative to wastewater discharge. As conditioned, impacts would be less than significant.

- | | Potentially Significant Impact | Less Than Significant With Mitigation Incorporation | Less Than Significant Impact | No Impact |
|---|--------------------------------|---|------------------------------|-----------|
| c. The passive nature of the solar field will result in no new or increased water for the site. The solar panels will require periodical washing to clean surfaces, however, water would be trucked onto the site for routine maintenance activities. No impact would occur. | | | | |
| d. The project would be served by Keller Canyon Landfill which has a capacity which exceeds current demand. As of January 2004, the Keller Canyon Landfill had 64.8 million cubic yards of remaining capacity and has enough permitted capacity to receive solid waste through 2030. No impacts will occur. | | | | |
| e. The project would not result in the generation of solid waste. Therefore, no impacts related to solid waste would occur. | | | | |

Mitigation Measures: None required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
XX. WILDFIRE. If located in or near state responsibility areas of lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion:

- a-d. This project is proposed to improve emergency services communication. The subject property is not located in a State Responsibility Area of very high fire hazard severity zone. The project would not increase exposure of people and/or structures to a significant loss, injury or death involving wildland fires. There are no project features that would impair an adopted emergency response plan or evacuation plan. The project would comply with current California Department of Forestry and California Building Code requirements for fire safety. The project site currently is not served by overhead utilities for power and would continue to do so as a result of the proposed project. No new overhead power line infrastructure would be required for the proposed use modification. Therefore, impacts would be considered less than significant.

Mitigation Measures: None Required.

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

Discussion:

- a. The site has been previously disturbed and does not contain any known listed plant, animal species, and special-status species. The project will not degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal. There are no potentially biological related impacts. No historic or prehistoric resources are anticipated to be affected by the proposed project nor will the proposed project eliminate important examples of the major periods of California history or prehistory. Potential biological impacts related to nesting habitat for several avian species would be reduced to less than significant levels through implementation of AMAs (by constructing the project outside of applicable nesting seasons), or through implementation of Mitigation Measures BIO-1 if construction occurs during identified nesting season as stated in **Section IV: Biological Resources** above. There is potential for historic or prehistoric resources to occur on site and Project construction activities could disturb previously unknown resources as a result of the Project. As stated in **Section V: Cultural Resources** and **Section VII: Geology and Soils** above, in the event archaeological artifacts are found, **Mitigation Measures CULT-1, CULT-2, CULT-3, and GEO-1** would reduce potential impacts to less than significant levels which would be incorporated into the project. Therefore, impacts would be considered less than significant with mitigation incorporation. In the event archaeological artifacts are found, a standard condition of approval would be incorporated into the project. There would be no impact.
- b. The project does not have impacts that are individually limited but cumulatively considerable. Potential air quality, greenhouse gas emissions, hydrology and traffic associated impacts are discussed in their respective sections above. The analysis determined that all potential impacts were less than significant and would not contribute significantly to cumulative impacts. The project does not propose new development that would have a significant impact on the environment or substantially change the existing conditions. With the imposition of standard and project specific conditions of approval, the project does not have impacts that are individually limited, or cumulatively considerable.
- c. All impacts identified in this Initial Study are less than significant, and Cultural Resources, Biological Resources, and Geology and Soils could require mitigation. As a result, mitigation measures were incorporated into the project that would address potential impacts to cultural resources and wildlife species. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

Mitigation Measures: None Required.