

# Appendix A

## **Notice of Preparation, Scoping Meeting Materials, and Scoping Comment Letters**





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**Planning, Building & Environmental Services**

1195 Third Street, Suite 210  
Napa, CA 94559  
[www.countyofnapa.org](http://www.countyofnapa.org)

**David Morrison**  
Director

## NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT

Date: January 24, 2022

To: Agencies and Interested Parties

From: Napa County Planning, Building, and Environmental Services Department

Subject: Notice of Preparation of a Draft Environmental Impact Report for the Napa County Housing Element Update

Review Period: January 24, 2022 to 5:00 PM on February 25, 2022

Napa County (County) proposes to prepare and adopt a comprehensive update to the Housing Element (of the General Plan) for Napa County for the period from January 2023 to January 2031 as required by State law. As part of the Housing Element Update (HEU or the project), the County also proposes to prepare and adopt limited amendments to other elements (or chapters) of the General Plan and the County's zoning map/regulations to maintain consistency with the updated Housing Element, and to improve consistency of the Safety Element with the *2020 Napa County Multi-Jurisdictional Hazard Mitigation Plan* and comply with recent changes in State law.

Amendment of the County's General Plan is a discretionary action subject to the California Environmental Quality Act (CEQA). The County will serve as the lead agency under CEQA and will prepare an environmental impact report (EIR) for the project to satisfy the requirements of CEQA (Public Resources Code [PRC] Section 21000 et seq.). Consistent with CEQA Guidelines Section 15168, the EIR will be a program EIR, allowing the County to consider the impacts of adoption and implementation of the HEU as well as program wide mitigation measures. Subsequent discretionary actions would be evaluated to determine whether their impacts fall within the scope of the program EIR or whether additional environmental review is required.

### PURPOSE OF THIS NOTICE OF PREPARATION

In accordance with the California Code of Regulations (CCR) Section 15082, the County has prepared this notice of preparation (NOP) to inform agencies and interested parties that an EIR will be prepared for the above-referenced project. The purpose of an NOP is to provide information about the project and its potential environmental impacts sufficient to allow agencies and interested parties the opportunity to provide a meaningful response related to the scope and content of the EIR, including mitigation measures and alternatives that should be considered (CCR Section 15082[b]). The project location, description, and potential environmental effects are summarized below.

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|                   |                   |                            |                      |                    |
|-------------------|-------------------|----------------------------|----------------------|--------------------|
| Planning Division | Building Division | Engineering & Conservation | Environmental Health | Parks & Open Space |
| (707) 253-4417    | (707) 253-4417    | (707) 253-4417             | (707) 253-4471       | (707) 259-5933     |

## PROJECT LOCATION

Napa County is located in the northern San Francisco Bay area, approximately 50 miles due west of Sacramento, California. The County is bordered by Lake County to the north, Yolo and Solano County to the east, Sonoma County to the west, and San Pablo Bay to the south (Exhibit 1). The planning area for the Housing Element Update is the same planning area that was considered by the 2008 General Plan, which encompasses all unincorporated land in Napa County (Exhibit 2). The unincorporated County includes approximately 9,022 residential dwelling units and comprises 789 square miles.

## BACKGROUND

The Napa County General Plan was comprehensively updated in 2008 and contains goals and policies that guide land use decisions in unincorporated Napa County. The General Plan contains eight principal chapters or “elements” including an Agricultural Preservation & Land Use Element, a Housing Element, and a Safety Element. The County’s Housing Element was last updated and adopted in 2014.

State law requires local jurisdictions to update their housing elements on a regular schedule and to maintain consistency between the housing element and other elements of the general plan. Each city and county in the Bay Area must update their current housing element to the satisfaction of the State Department of Housing and Community Development (HCD) by January 31, 2023 and must plan for a number of new housing units referred to as their Regional Housing Needs Allocation (RHNA).

A RHNA is generally assigned to each jurisdiction by the Association of Bay Area Government (ABAG) Council of Governments for the eight year planning period and includes housing units at various levels of affordability (very low income, low income, moderate income, and above moderate). The County’s RHNA as of December 2021 is shown in Table 1, below and is subject to modification via transfer agreements with incorporated jurisdictions as described further below.

| TABLE 1. NAPA COUNTY REGIONAL HOUSING NEEDS (RHNA) ALLOCATION AS OF DECEMBER 2021 <sup>a</sup>  |                       |     |          |                |             |
|---|-----------------------|-----|----------|----------------|-------------|
|   | Units by Income Group |     |          |                | Total Units |
|   | Very Low              | Low | Moderate | Above Moderate |             |
| RHNA Allocation <sup>a</sup>  | 369                   | 213 | 120      | 312            | 1,014       |
| % of Total  | 36%                   | 21% | 12%      | 31%            | 100%        |
| Notes:<br><sup>a</sup> The RHNA allocation shown here was adopted by ABAG on December 16, 2021 and may be modified via transfers pursuant to California Government Code Section 65584.07. |                       |     |          |                |             |

Source: ABAG, December 2021.

Over the past 12 years, the County has entered into agreements with the City of American Canyon, the City of Napa, and the City of St. Helena, that would allow the County to transfer portions of its RHNA allocation to these jurisdictions pursuant to California Government Code Section 65584.07. These agreements reflect a shared commitment by the County and incorporated jurisdictions to agricultural preservation and urban centered growth, and the County is in the process of requesting ABAG’s approval of RHNA transfers on the basis of these agreements, which are shown in Table 2 below.



| TABLE 2. RHNA TRANSFER AGREEMENTS AVAILABLE FOR USE BY THE COUNTY <sup>a</sup> |                                    |     |          |                |                  |
|--|------------------------------------|-----|----------|----------------|------------------|
| Jurisdiction and Date of Agreement   | Units by Income Group <sup>b</sup> |     |          |                | Total Units      |
|  | Very Low                           | Low | Moderate | Above Moderate |                  |
| City of Napa (December 17, 2019)   | 295                                | 170 | 96       | 250            | 811              |
| City of American Canyon (May 25, 2010)   | 46                                 | 38  | 46       | 56             | 168 <sup>c</sup> |
| City of American Canyon (May 2, 2017)  | 11                                 | 6   | 4        | 9              | 30               |
| City of St. Helena (June 26, 2017)   | 1                                  | 0   | 0        | 1              | 2                |
| Total Transfers Available  | 374                                | 216 | 122      | 317            | 1,029            |

Notes:  
<sup>a</sup>Transfer agreements reflect agreement by the County and an incorporated jurisdiction to use the RHNA transfer process contained in Government Code Section 65584.07. Transfers are subject to ABAG approval during the period between ABAG's adoption of the final RHNA allocation in December 2021 and January 2031.  
<sup>b</sup>Except in the City of American Canyon May 25, 2010 agreement, the distribution of units by income group is not specified within the agreements and is presented here based on the distribution of units in the County's December 2021 RHNA.  
<sup>c</sup>Numbers in this agreement add up to 186, but the agreement specifically references 168 units.

Source: Napa County, January 2022

The County's request for a transfer pursuant to Government Code Section 65584.07 will seek to transfer approximately 90% of the County's RHNA based on the executed agreements and factors/circumstances that will be outlined in the request. If approved by ABAG, the transfers will modify the County's RHNA as shown in Table 3 below and the Housing Element Update will plan for that RHNA plus a buffer.

| TABLE 3. NAPA COUNTY REGIONAL HOUSING NEEDS (RHNA) ALLOCATION BASED ON PROPOSED TRANSFERS <sup>a</sup> |                       |     |          |                |             |
|--|-----------------------|-----|----------|----------------|-------------|
|  | Units by Income Group |     |          |                | Total Units |
|  | Very Low              | Low | Moderate | Above Moderate |             |
| December 2021 RHNA Allocation  | 369                   | 213 | 120      | 312            | 1,014       |
| % of Total   | 57%                   |     | 43%      |                | 100%        |
| Proposed Transfers <sup>b</sup>  | 324                   | 197 | 106      | 281            | 908         |
| Revised RHNA <sup>a</sup> Allocation if Transfers are Approved   | 45                    | 16  | 14       | 31             | 106         |
| % of Total   | 57%                   |     | 43%      |                | 100%        |

Notes:  
<sup>a</sup>The County is in the process of requesting transfers pursuant to California Government Code Section 65584.07 which – if approved by ABAG – would modify the County's RHNA as shown.  
<sup>b</sup>The proposed transfers would be based on signed agreements between the County and the cities of American Canyon, Napa, and St. Helena, although they would not transfer all of the units allowed for under all agreements.

Source: Environmental Science Associates, December 2021.

## PROJECT DESCRIPTION

The project analyzed in the EIR would update the County's Housing Element, including goals, objectives, policies, and implementation programs that address the maintenance, preservation, improvement, and development of housing in unincorporated Napa County. In addition, the HEU would identify sites appropriate for the development of multifamily housing, and the County would rezone those sites as necessary to meet the requirements of State law. The project would

also include amendments to other elements of the County General Plan in order to maintain internal consistency, to improve consistency of the Safety Element with the *2020 Napa County Multi-Jurisdictional Hazard Mitigation Plan*, and to comply with recent changes in State law.

The HEU will be the subject of community outreach and will evolve based on community input before being submitted to HCD for review and before being considered for adoption by the County Board of Supervisors prior to January 31, 2023. Given the time needed to prepare an EIR, certain assumptions are being made about the contents of the HEU in order to initiate the environmental review process. Specifically, the County assumes and the EIR will analyze an HEU that would meet all legal requirements and:

1. include an updated housing needs assessment;
2. include updated goals, policies, and programs that address the maintenance, preservation, improvement, and development of housing and affirmatively further fair housing;
3. include a housing inventory that meets the County's final RHNA following transfers pursuant to Government Code Section 65584.07 and provide a buffer of additional housing development capacity, including sites for multifamily housing development within the unincorporated area;
4. require limited amendments to the Agricultural Preservation and Land Use Element of the General Plan as/if needed to acknowledge the housing sites;
5. require limited amendments to the County's zoning map and zoning ordinance to rezone the housing site(s); and
6. require limited amendments to the Safety Element of the General Plan to improve consistency of the Safety Element with the *2020 Napa County Multi-Jurisdictional Hazard Mitigation Plan* and comply with recent changes in State law.

The County proposes to use a variety of methods to meet its RHNA requirement, including continued development of single family homes and accessory dwelling units (ADU), a program to encourage development of farmworker housing units, and identification of multifamily housing sites.

The County's General Plan and zoning ordinance permits construction of one single family home on each legal lot, with the exception of areas that are zoned for industrial use. HCD guidance suggests that the County's HEU may assume development of market rate single family homes on currently vacant and buildable parcels.

The County's zoning also permits one Accessory Dwelling Unit (ADU) and one Junior Accessory Dwelling Unit (JADU) per parcel within residentially and Agricultural Watershed (AW) zoning. One JADU is permitted in Agricultural Preservation (AP) zoning. HCD guidance suggests that the County may assume that ADUs and JADUs continue to develop at the same pace and affordability levels that has occurred over the last three years, yielding approximately 72 units at a range of income levels over the eight year planning period of the HEU.

The County's zoning ordinance permits development of up to 12 individual farmworker housing units as an allowed use by right on every legal parcel in agricultural zones. The County is seeking to encourage additional development of farmworker units, is participating in ABAG's Farmworker Collaborative, and has not established a goal for unit production during the planning period.

The County is proposing to meet the balance of its RHNA and provide a "buffer" by identifying sites for development of multifamily housing at a minimum density of 20 dwelling units per acre. This is the "default density" considered affordable to lower income households under State law for unincorporated Napa County.

In identifying potential sites, the County is proposing to use the following screening criteria:

1. Sites must have access to existing or planned water, sewer, and other dry utilities with sufficient capacity available to support housing development; (*Source: State requirement*)
2. Sites must generally be between 0.5 and 10 acres in size; (*Source: State requirement*)

3. Sites must be located outside of areas designated Agricultural Resource or Agriculture, Watershed & Open Space as of September 28, 2007 (the date specified in Measure P, approved by the voters in November 2008). Notwithstanding this requirement, sites within an area designated Agricultural Resource or Agriculture, Watershed & Open Space may be identified for qualifying farmworker housing development and sites identified as an existing commercial establishment on General Plan *Figure AG.LU-2: Location of Parcels Subject to Policy AG/LU-45* may be identified for redevelopment.

In addition, the County's goal is to identify sites that are:

4. Located outside of high and very high fire severity zones as designated (in State Responsibility Areas) or recommended (in Local Responsibility Areas) by CalFire.
5. Located outside of Zones A through D of the applicable Airport Land Use Compatibility Plan.
6. Proximate to transit routes and/or employment opportunities and services (e.g. groceries).

Sites identified during development of the HEU will be evaluated using these criteria/goals and analyzed to determine their ability to meet State requirements plus a buffer.

An initial screening of potential sites has identified the following potential sites for additional analysis and community input:

1. Possible farmworker housing sites or incentives;
2. One or more existing housing element sites with additional incentives;
3. One or more small sites in the vicinity of Carneros Resort if utilities can be provided;
4. One or more sites between Foster Road and State Route 29 within the City of Napa Rural Urban Limit (RUL);
5. One or more sites needing State agreement (e.g. a site at Napa State Hospital);
6. The 9.8-acre Stonebridge School site in Carneros;
7. One or more sites in the Silverado Area if utilities can be provided;
8. One or more sites proximate to planned resorts at Lake Berryessa; and
9. Other sites to be identified via additional analysis and community input during preparation of the HEU.

Sites included in the HEU will be proposed for rezoning by applying the Affordable Housing Overlay Zone in Section 18.82 of the County's zoning ordinance to selected site(s) on the County's zoning map. This provision of the zoning ordinance would be amended to allow selected sites to develop at 20 dwelling units per acre without a use permit. Selected sites and HEU implementation programs may also require small adjustments to language or figures included in the Agricultural Preservation and Land Use Element of the General Plan to maintain internal consistency between the elements.

In conjunction with updates to the Housing Element itself, the project would include targeted updates to the Safety Element of the General Plan to improve consistency of the Safety Element with the *2020 Napa County Multi-Jurisdictional Hazard Mitigation Plan* and to comply with recent changes in State law.

## POTENTIAL ENVIRONMENTAL IMPACTS

Pursuant to CEQA and State CEQA Guidelines Section 15064, the discussion of potential effects on the environment in the EIR shall be focused on those impacts that the County has determined may be potentially significant. The EIR will also evaluate the cumulative impacts of the project when considered in conjunction with other related past, current, and reasonably foreseeable future projects. The County has determined that the project could result in potential environmental impacts in the following topic areas, which will be further evaluated in the EIR:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural and Historical Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Energy
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

No initial study has been prepared, however the EIR will focus on those issue areas where potentially significant impacts may occur. Feasible mitigation measures will be identified to reduce any potentially significant and significant impacts.

## ALTERNATIVES TO BE EVALUATED IN THE EIR

In accordance with the State CEQA Guidelines (CCR Section 15126.6), the EIR will describe a range of reasonable alternatives to the project that are capable of meeting most of the project's objectives and that would avoid or substantially lessen any of the significant effects of the project. The EIR will also identify any alternatives that were considered but rejected by the lead agency as infeasible and briefly explain the reasons why, and will identify the environmentally superior alternative. Among the alternatives being considered for inclusion in the EIR are the No-Project Alternative (required by CEQA), and an alternative that would include one or more different housing sites than those selected for inclusion in the HEU.

## DOCUMENTS AVAILABLE FOR PUBLIC REVIEW

This NOP is available for public review at the following locations:

Napa County Planning, Building, and  
Environmental Services Department  
1195 Third Street, Suite 210  
Napa, CA

Napa Main Library  
580 Coombs Street  
Napa, CA

St. Helena Library  
1492 Library Lane  
St. Helena, CA

This NOP is also available for public review online at <https://www.countyofnapa.org/2876/Current-Projects-Explorer> and has been provided to the Governor's Office of Planning and Research (OPR) "Clearing House" and the Napa County Clerk for posting along with a Notice of Completion.

The County is seeking input on the HEU as well as on the scope of the EIR. Project materials can be viewed online at: <https://www.countyofnapa.org/3250/2022-Housing-Element-Update>. To review materials in Spanish please contact Staff to request materials using the contact information below.

## PROVIDING COMMENTS

Agencies and interested parties may provide the County with written comments on topics to be addressed in the EIR for the project. Because of time limits mandated by State law, comments should be provided no later than 5:00 p.m. on February 25, 2022. Please send all comments to:

Napa County Planning, Building, and Environmental Services Department  
Attention: Trevor Hawkes  
1195 Third Street, Suite 210  
Napa, CA 94559  
Email: [Trevor.Hawkes@countyofnapa.org](mailto:Trevor.Hawkes@countyofnapa.org)

Agencies that will need to use the EIR when considering permits or other approvals for the project should provide the name, phone number, and email address of the appropriate contact person at the agency. Comments provided by email should include "Housing Element Update NOP Scoping Comment" in the subject line, as well as the name and physical address of the commenter in the body of the email.

All comments on environmental issues received during the public comment period will be considered and addressed in the Draft EIR, which is anticipated to be available for public review in mid-2022.

## PUBLIC SCOPING MEETING

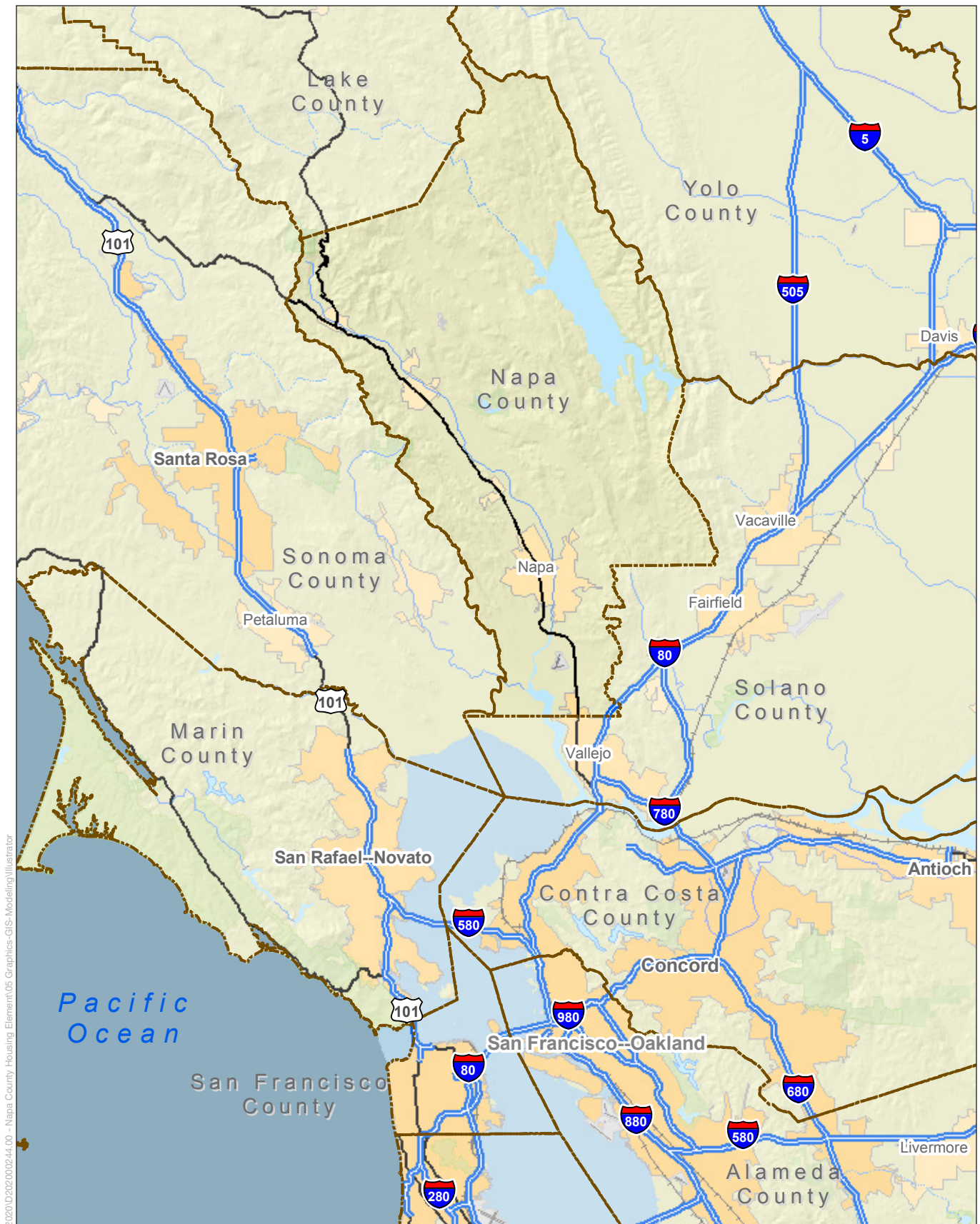
The Napa County Planning Commission will hold a public scoping meeting to inform interested parties about the proposed project and to provide agencies and the public with an opportunity to provide comments on the scope and content of the EIR. The meeting time and location are as follows:

Wednesday, February 16, 2022, at 9:00 a.m.

Napa County Administration Building Third Floor  
Board Chamber  
1195 Third Street  
Napa, CA 94559

This meeting will be conducted via teleconference using the Microsoft Zoom program in order to minimize the spread of the COVID-19 virus, in accordance with the State of Emergency proclaimed by Governor Newsom on March 4, 2020, Executive Order N-29-20 issued by Governor Newsom on March 17, 2020, and the Shelter in Place Order issued by the Napa County Health Officer on March 18, 2020, as may be periodically amended. To participate in the public scoping meeting, the public are invited to observe and address the Commission telephonically or electronically. Instructions for public participation will be included in the agenda for the meeting, which will be available one week prior to the meeting date.

The meeting space is accessible to persons with disabilities. Individuals needing special assistive devices will be accommodated to the County's best ability. Assistive listening devices are available for the hearing impaired from the Clerk of the Board; please call (707) 253-4580 for assistance. If an American Sign Language interpreter or any other special arrangement is required, please provide the Clerk of the Board with 48-hour notice by calling (707) 253-4417.



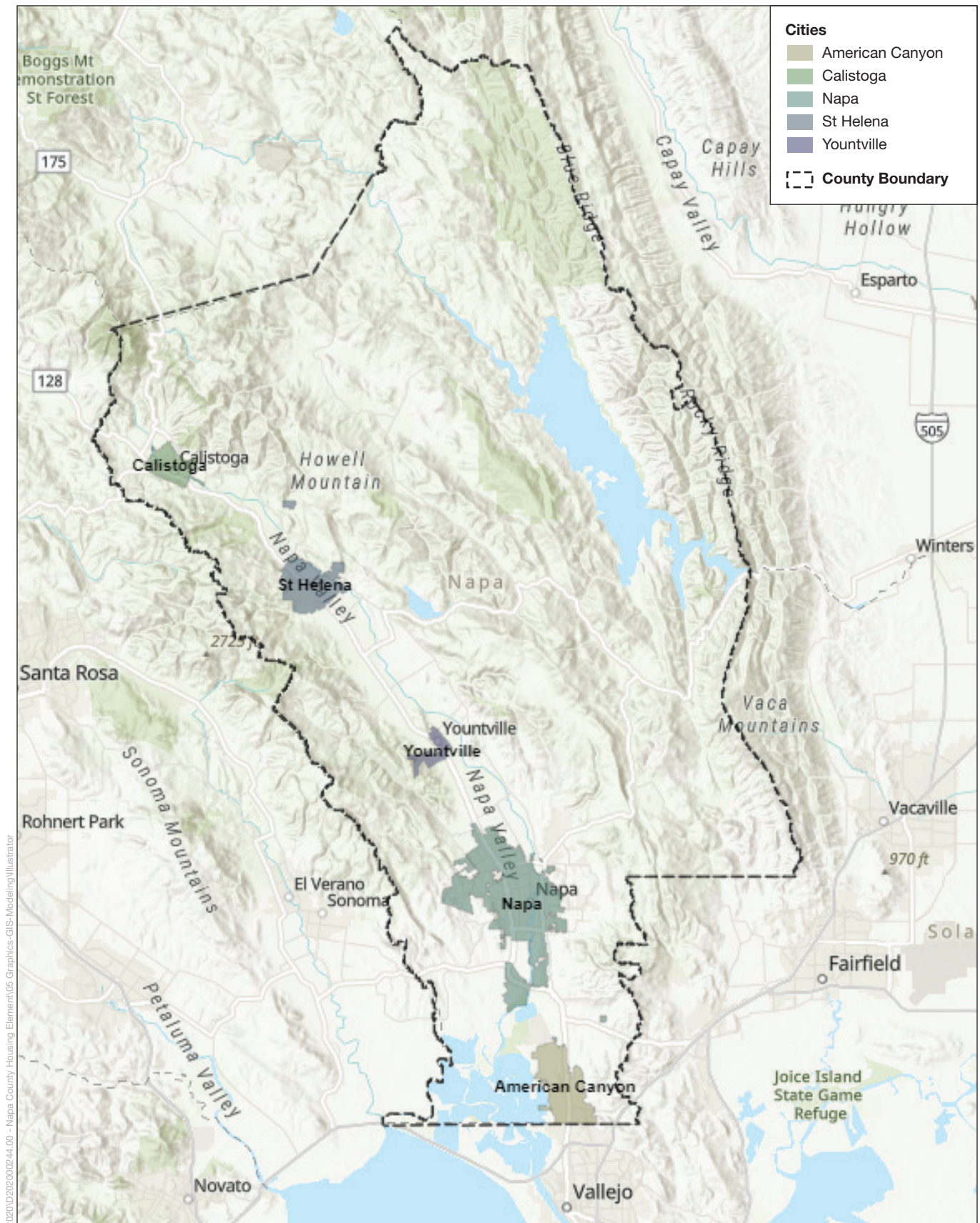
2020\ID20200244.00 - Napa County Housing Element\05 Graphics-GIS-Modeling\Illustrator

SOURCE: Napa County, 2007

Napa County Housing Element Update EIR

## Exhibit 1 Regional Location Map





SOURCE: Napa County, 2021

Napa County Housing Element Update EIR

## Exhibit 2 Project Location Map





## NATIVE AMERICAN HERITAGE COMMISSION

January 26, 2022

Trevor Hawkes  
Napa County  
1195 Third Street, Room 210  
Napa, CA 94559

**Re: 2022010309, Napa County Housing Element Update Project, Napa County**

Dear Mr. Hawkes:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides 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. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

**Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.**



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AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

**1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:**

Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

- a. A brief description of the project.
- b. The lead agency contact information.
- c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
- d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

**2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1 (b)).

- a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

**3. Mandatory Topics of Consultation If Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- a. Alternatives to the project.
- b. Recommended mitigation measures.
- c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).

**4. Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:

- a. Type of environmental review necessary.
- b. Significance of the tribal cultural resources.
- c. Significance of the project's impacts on tribal cultural resources.
- d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

**5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

**6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

- a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
- b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a.** The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
  - b.** A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- a.** Avoidance and preservation of the resources in place, including, but not limited to:
    - i.** Planning and construction to avoid the resources and protect the cultural and natural context.
    - ii.** Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
  - b.** Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
    - i.** Protecting the cultural character and integrity of the resource.
    - ii.** Protecting the traditional use of the resource.
    - iii.** Protecting the confidentiality of the resource.
  - c.** Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
  - d.** Protecting the resource. (Pub. Resource Code §21084.3 (b)).
  - e.** Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
  - f.** Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a.** The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
  - b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
  - c.** The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: [http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation\\_CalEPAPDF.pdf](http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf)

## SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: [https://www.opr.ca.gov/docs/09\\_14\\_05\\_Updated\\_Guidelines\\_922.pdf](https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf).

Some of SB 18's provisions include:

1. Tribal Consultation: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. No Statutory Time Limit on SB 18 Tribal Consultation. There is no statutory time limit on SB 18 tribal consultation.
3. Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. Conclusion of SB 18 Tribal Consultation: Consultation should be concluded at the point in which:
  - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
  - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

## NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center ([http://ohp.parks.ca.gov/?page\\_id=1068](http://ohp.parks.ca.gov/?page_id=1068)) for an archaeological records search. The records search will determine:
  - a. If part or all of the APE has been previously surveyed for cultural resources.
  - b. If any known cultural resources have already been recorded on or adjacent to the APE.
  - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
  - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
  - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
  - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
  - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
  - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
  - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, § 15064.5(f) (CEQA Guidelines § 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
  - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
  - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code § 7050.5, Public Resources Code § 5097.98, and Cal. Code Regs., tit. 14, § 15064.5, subdivisions (d) and (e) (CEQA Guidelines § 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:  
[Andrew.Green@nahc.ca.gov](mailto:Andrew.Green@nahc.ca.gov).

Sincerely,



Andrew Green  
Cultural Resources Analyst

cc: State Clearinghouse

**From:** [Carol Kunze](#)  
**To:** [Hawkes, Trevor](#); [Tom Gamble](#)  
**Subject:** map for housing at Berryessa  
**Date:** Friday, February 11, 2022 10:49:49 AM  
**Attachments:** [Maps Structure Damage.pdf](#)

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[External Email - Use Caution]

Nice speaking with you yesterday.

As promised, this email will list some of the current housing issues for Lake Berryessa that we discussed. It will also describe the type of map that may help housing element committee members better understand the Lake Berryessa area, including its residential and commercial areas.

Sorry it took so long. Urgent work came up.

There are 3 residential areas in the immediate Lake Berryessa area - Berryessa Pines, Spanish Flat and Berryessa Highlands. The greater watershed has two additional residential areas - Berryessa Estates and Circle Oaks.

Berryessa Estates, a residential area 6 miles up Putah Creek, while considered part of the Pope Valley area, shares a lot of issues, particularly with Berryessa Highlands.

Issues

Fire - we lost a lot of homes in the 2020 fire. I've attached a CalFire map showing the residences that were lost in Berryessa Highlands and Spanish Flat.

I understand that Berryessa Estates, Berryessa Pines and Circle Oaks did not lose any homes.

Berryessa Highlands and Berryessa Estates have only one road access.

All residential areas have issues with their water district.

Map

As we discussed, it might help those on the advisory committee who are not familiar with the Lake Berryessa area to have a map showing the land use and zoning types for the commercial and residential areas, along with definitions.

The old map I have has the definitions beside the map, and call outs showing the parcels and zoning for the residential and commercial areas with multiple zoning types.

I find initials (CN, MC, etc.) easier to identify zones than different colors.

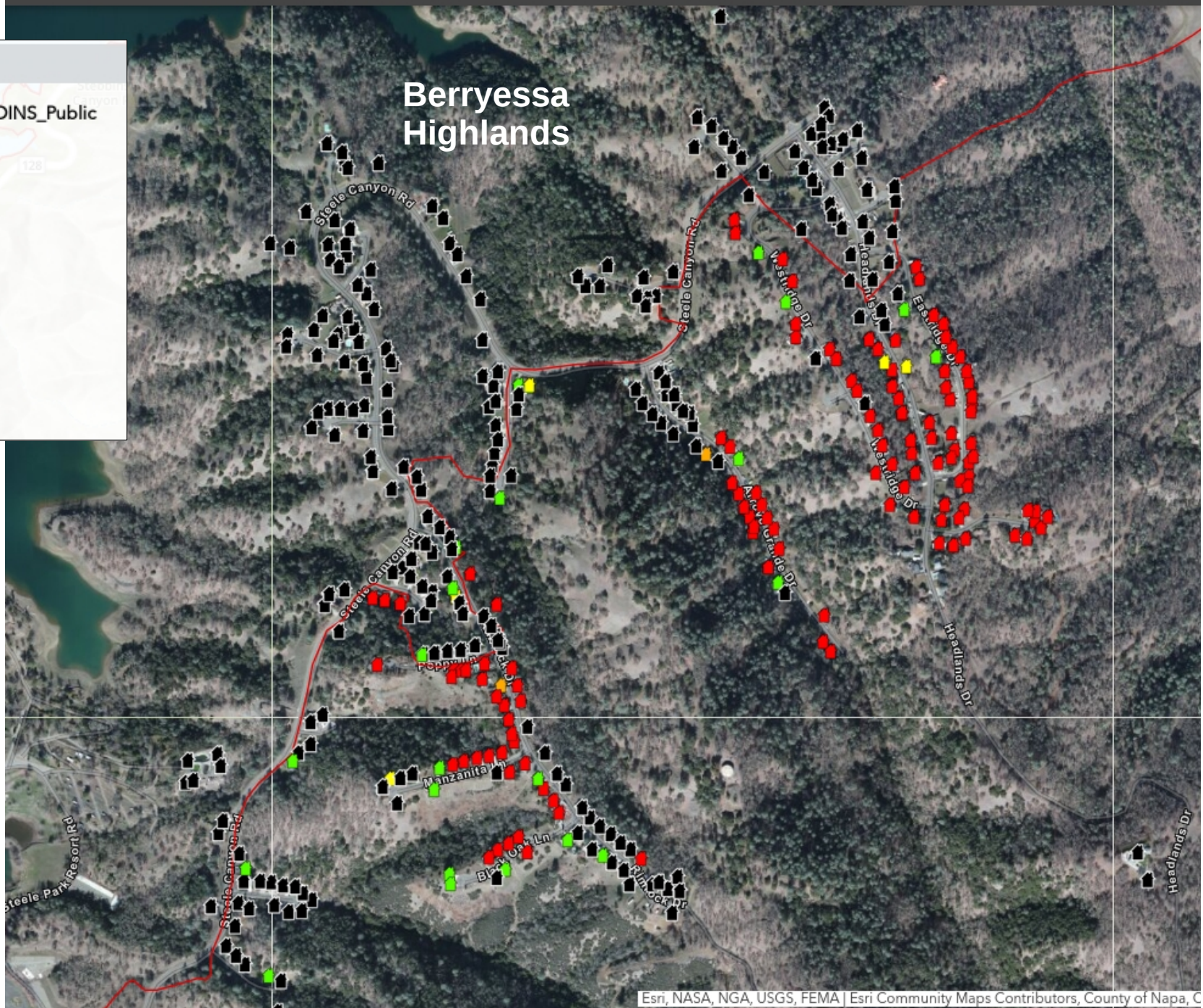
There are two or three residential areas that appear to be legal, nonconforming

- Berryessa Pines (homes), what used to be the Turtle Rock motel (apartments and rental homes), and the former site for Spanish Flat Mobile Villas (trailer park).

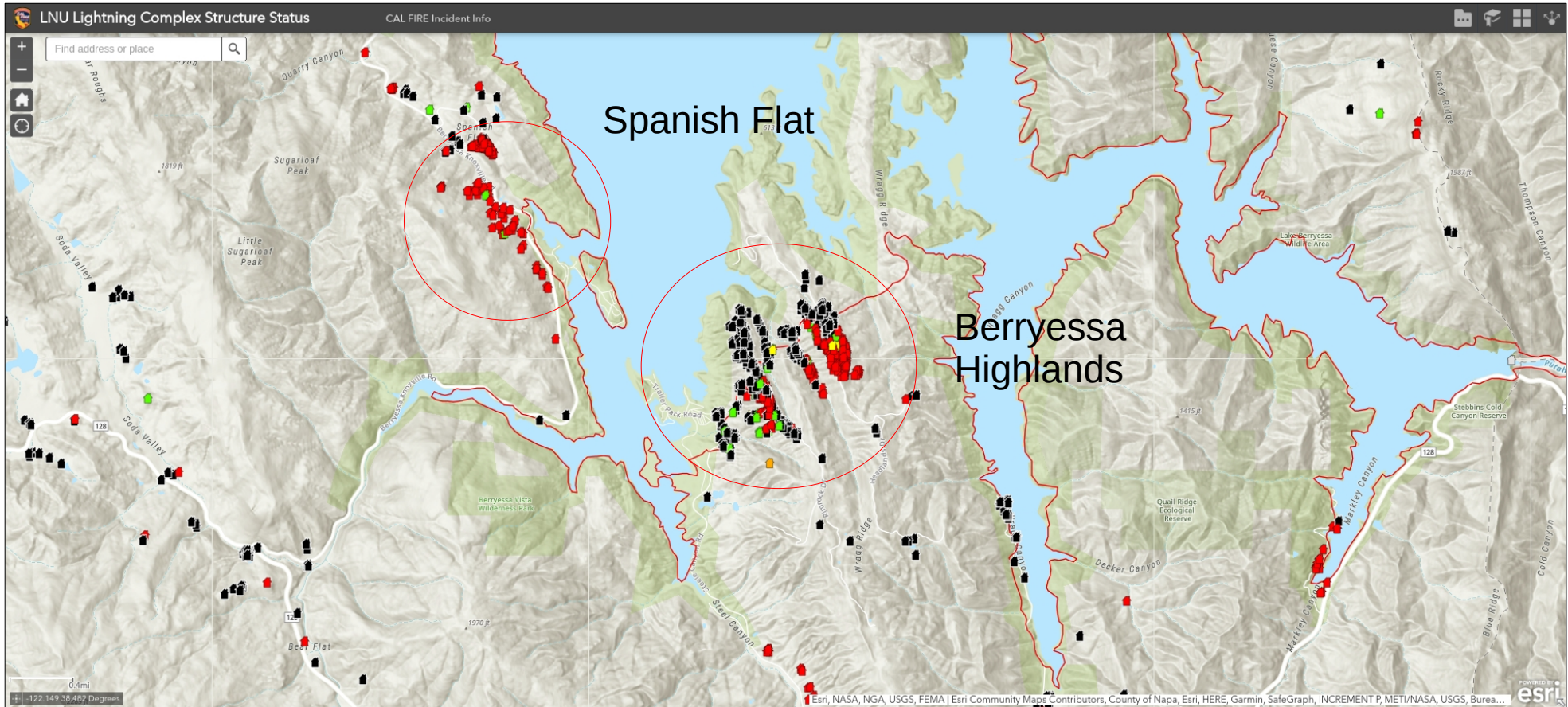
Feel free to call.

Carol Kunze  
707.345.6755









Planning Commission Mtg.  
February 16, 2022  
Agenda Item # 8A

**From:** Jake Ruygt <[jruygt@comcast.net](mailto:jruygt@comcast.net)>  
**Sent:** Tuesday, February 15, 2022 9:56 AM  
**To:** PlanningCommissionClerk <[planningcommissionclerk@countyofnapa.org](mailto:planningcommissionclerk@countyofnapa.org)>  
**Subject:** RE: Napa County Planning Commission Meeting Agenda

[External Email - Use Caution]

Dear Planning Commissioners,

I am replying as a representative of the Napa valley Chapter of the California Native Plant Society. My comments are perhaps more in line with a personal concern. The range of topics to be covered by the EIR include biological resources and air quality issues that apply impacts on natural resources. In the face of declining annual rainfall it is imperative that the study also include impacts on overall water use and availability. Continued urban and agricultural growth is placing greater demands on water supplies, wetlands and streams. I include agriculture as part of my comment because they are directly linked in this county.

Thank You.

Jake Ruygt  
[jruygt@comcast.net](mailto:jruygt@comcast.net)  
3549 Willis Drive,  
Napa

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**From:** PlanningCommissionClerk [<mailto:planningcommissionclerk@countyofnapa.org>]  
**Sent:** Tuesday, February 08, 2022 4:27 PM  
**Subject:** Napa County Planning Commission Meeting Agenda

**From:** [Kelly Bond](#)  
**To:** [Hawkes, Trevor](#)  
**Cc:** [Joaquin Razo](#); [mrodriguez@upvalleyfamilycenters.org](mailto:mrodriguez@upvalleyfamilycenters.org); [Chapin, Jessica](#)  
**Subject:** Public Comment on Housing Element Update\_Smoke-Free Protections  
**Date:** Friday, February 18, 2022 4:13:07 PM  
**Attachments:** [2.17.22 Letter of Support Napa County Housing Element Update.pdf](#)

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[External Email - Use Caution]

Good afternoon,

The attached public comment is from Blue Zones Project Upper Napa Valley regarding the Housing Element update and smoke-free protections.

Please let me know if you have any questions.

Best,

**Kelly Bond, MPH (she/her) | Public Policy Advocate, Upper Napa Valley**

**D:** 707.387.1701 | [kelly.bond@sharecare.com](mailto:kelly.bond@sharecare.com)

#### **Blue Zones Project**

We help people live longer, better lives by improving their surroundings.

[Click here to learn more about how you can get involved in Blue Zones Project Upper Napa Valley!](#)



## BLUE ZONES PROJECT

February 17<sup>th</sup>, 2022

Napa County Planning Division  
1195 Third Street, 2nd Floor  
Napa, CA 94559

Re: Housing Element Update

Dear Planning Division Staff,

Blue Zones Project is writing to urge your consideration of adding tobacco and secondhand smoke recommendations in the County's updated housing element, including comprehensive smoke-free multi-unit housing protections.

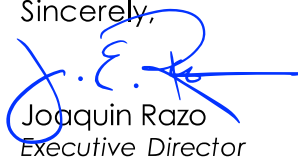
According to the U.S. Surgeon General, there is no safe level of exposure to secondhand smoke. Secondhand tobacco and marijuana smoke or vaporized aerosols can easily drift from unit-to-unit through vents, pipes and electrical outlets and through windows and doors from neighbor balconies, patios and other outdoor areas. Individuals who are exposed to secondhand smoke can suffer from serious adverse health effects including chronic health problems.

Updating the housing element is a chance to ensure equitable health opportunities for all residents while encouraging a productive community with economic stability. Health starts in our communities and is shaped by where we live, work, and play. As such, housing is a vital component to one's health. The inclusion of tobacco control restrictions to prevent secondhand smoke and aerosol exposure will provide profound health benefits to all residents so they can have healthy and productive lives.

As you work on updating your housing element, we would ask that you consider incorporating the following language into your goals and policies:

*To reduce secondhand and thirdhand smoke death and disability, adopt and enforce a comprehensive smoke-free ordinance for multifamily housing properties that covers all exclusive-use areas, both exterior areas (such as private balconies and decks) and interior unit spaces, as well as common areas not already covered by state law.*

Sincerely,

  
Joaquin Razo  
Executive Director



Kelly Bond  
Public Policy Advocate

1422 Main Street  
Saint Helena, CA 94574  
[unv.bluezonesproject.com](http://unv.bluezonesproject.com)

POWERED BY:



**From:** [jillalexgolfs](#)  
**To:** [Hawkes, Trevor](#)  
**Subject:** High density housing  
**Date:** Thursday, February 17, 2022 5:54:35 PM

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[External Email - Use Caution]

My thoughts are that many Napa county residents and other communities in California have gotten the message that our concerns are futile and not important to the end goal of federal and state funds/mandates. My husband and I attended an early meeting of the planning commission on this issue. The sense I had from Mr. Morrison was that 1) we don't care about citizen concerns and 2) so what if you can't evacuate in a fire like 2017. And 3) spending tax payers money to make it happen was not an issue.

So with a feeling of futility, I continue to protest the county adding so many souls to a high risk fire area. At Silverado and Atlas Peak, we have only one two lane road to evacuate on or for other emergencies. There's no way to expand this country road, there's no access to municipal transportation or immediate accessibility to essential shopping. There's no city sewer currently available.

Some residents are still rebuilding their lives and homes from the fire of 2017. How could you put these new residents in this position? Will they have enough insurance to provide housing while theirs is rebuilt? We know how devastating it is to lose everything that one owns. Even worse, I would hope that you don't want people to face loss of life because they can't out run a fire.

It doesn't make sense that you'd put so many souls at risk for state and federal funds and political mandates.

With regards and strong concerns,  
Jill Alexander

Sent from my iPhone

**From:** [Renee C](#)  
**To:** [Hawkes, Trevor](#)  
**Subject:** Housing survey and questions from public  
**Date:** Monday, February 21, 2022 8:55:39 AM

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[External Email - Use Caution]

Hello Trevor, good morning.

I am writing in regards to the desire for the County of Napa to hear from us.

I read that some people feel adding more housing to Upvalley will cause more traffic, and I feel the opposite is true as long as the housing is for workers in Napa County. I believe the automatic assumption is the housing will be second homes and vacation homes and while this is likely it should not have to happen.

Having housing inventory Upvalley for instance would get me and my entire family off the road everyday. It would also get 10 of my employees off the road everyday. In other words we all commute up and down Silverado Trail or Hwy 29 every single day of the week. Multiply this by hundreds of people who work Upvalley.

First time home owners competing with out of town buyers. Somehow we have to have incentives for first time home buyers and penalties for second time home buyers. We can build and build but as long as the homes are scooped up by second home buyers, we will never succeed in making a dent in our local housing crisis. While we are a first world travel destination, we are becoming a third world country with the division of rich vs poor.

These are some of my thoughts and thank you for reading.

Sincerely,

Renee Mortell Cazares  
707.339.9905

**From:** [susann.evans](#)  
**To:** [Hawkes, Trevor](#)  
**Subject:** EIR report for affordable housing in Napa  
**Date:** Tuesday, February 22, 2022 2:33:11 PM

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[External Email - Use Caution]

To: Trevor Hawkes , County of Napa

From: Susann Evans, Napa resident

RE: EIR for housing areas in Napa County

The area off Foster road is such a delightful entry to Napa – the vineyards on one side of 29 and the rolling hills and grassland with cattle are a refreshing gateway to Napa wine country. Foster road is used each day by many people for biking and walking for exercise. The chance to walk with the natural world next to you is a treasure we all enjoy. It would be a real tragedy to turn this bucolic area into tract housing as an entry point to Napa.

Stonebridge School area would have sewer and water connections available for housing as would the Napa state hospital site. These seem to be good candidates for housing. Carneros Spa area would be another good site since the recent development there has made access to water and sewer enhanced.

The Silverado area would be a good site to have housing stock that is more affordable for families. I hope the EIR report will consider placement of affordable housing in multiple areas of Napa not just south Napa.



**From:** [Hultman, Debbie@Wildlife](mailto:Hultman,Debbie@Wildlife)  
**To:** [trevor.hawkes@countyofnapa.org](mailto:trevor.hawkes@countyofnapa.org)  
**Cc:** [OPR State Clearinghouse](#); [Culpepper, Amanda\(Mandy\)@Wildlife](mailto:Culpepper,Amanda(Mandy)@Wildlife); [Day, Melanie@Wildlife](mailto:Day,Melanie@Wildlife); [Weightman, Craig@Wildlife](#); [Jillian Feyk-Miney](#)  
**Subject:** Napa County Housing Element Update-SCH2022010309  
**Date:** Wednesday, February 23, 2022 4:36:01 PM  
**Attachments:** [Napa County Housing Element Update-SCH2022010309-Hawkes-CULPEPPER022522.pdf](#)

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Good Afternoon,

Please see the attached letter for your records. If you have any questions, contact Amanda Culpepper, cc'd above.

Thank you,

*Debbie Hultman* | Assistant to the Regional Manager  
California Department of Fish and Wildlife – Bay Delta Region  
2825 Cordelia Road, Ste. 100, Fairfield, CA 94534  
707.428.2037 | [debbie.hultman@wildlife.ca.gov](mailto:debbie.hultman@wildlife.ca.gov)





State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
Bay Delta Region  
2825 Cordelia Road, Suite 100  
Fairfield, CA 94534  
(707) 428-2002  
[www.wildlife.ca.gov](http://www.wildlife.ca.gov)

**GAVIN NEWSOM, Governor**  
**CHARLTON H. BONHAM, Director**



February 22, 2022

Mr. Trevor Hawkes  
County of Napa  
1195 Third Street, Suite 210  
Napa, CA 94559  
[trevor.hawkes@countyofnapa.org](mailto:trevor.hawkes@countyofnapa.org)

Subject: Napa County Housing Element Update, Notice of Preparation of a Draft  
Environmental Impact Report, SCH No. 2022010309, Napa County

Dear Mr. Hawkes:

The California Department of Fish and Wildlife (CDFW) has reviewed the Notice of Preparation (NOP) of a draft Environmental Impact Report (EIR) from the County of Napa (County) for the Napa County Housing Element Update (Project).

CDFW is a **Trustee Agency** with responsibility under the California Environmental Quality Act (CEQA) for commenting on projects that could impact fish, plant, and wildlife resources (Pub. Resources Code, § 21000 et seq.; Cal. Code Regs., tit. 14, § 15386). CDFW is also considered a **Responsible Agency** if a project would require discretionary approval, such as a California Endangered Species Act (CESA) Incidental Take Permit (ITP), a Native Plant Protection Act (NPPA) Permit, a Lake and Streambed Alteration (LSA) Agreement, or approval under other provisions of the Fish and Game Code that afford protection to the state's fish and wildlife trust resources. Pursuant to our authority, CDFW has the following concerns, comments, and recommendations regarding the Project.

## PROJECT DESCRIPTION AND LOCATION

The Project would update the Housing Element within the County's General Plan, as well as limited amendments and updates to other portions of the General Plan and zoning map. The Housing Element would identify locations in unincorporated Napa County to meet the need for a maximum of 1,014 housing units and a minimum of 106 housing units. The County has identified that a portion of the housing units will be transferred to nearby cities and incorporated jurisdictions, if approved by the Association of Bay Area Governments. The timeframe for the Housing Element update would be 2023 through 2031. The Project is located in unincorporated Napa County.

The CEQA Guidelines (Cal. Code Regs., tit. 14, § 15000 et seq.) require that the draft EIR incorporate a full project description, including reasonably foreseeable future

Mr. Trevor Hawkes  
 County of Napa  
 February 22, 2022  
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phases of the Project, that contains sufficient information to evaluate and review the Project's environmental impact (CEQA Guidelines, §§ 15124 & 15378). Please include a complete description of the following Project components in the Project description, as applicable:

- Footprints of permanent Project features and temporarily impacted areas, such as staging areas and access routes.
- Land use changes that would reduce open space or agricultural land uses and increase residential or other land use involving increased development.
- Area and plans for any proposed buildings/structures, ground disturbing activities, fencing, paving, stationary machinery, landscaping, floodwalls or levees, and stormwater systems.
- Operational features of the Project, including level of anticipated human presence (describe seasonal or daily peaks in activity, if relevant), artificial lighting/light reflection, noise, traffic generation, and other features.
- Construction schedule, activities, equipment, and crew sizes.

Based on the broad scope of the Project, it appears that the draft EIR may be a program EIR (CEQA Guidelines, § 15168). In this case, while program EIRs have a necessarily broad scope, CDFW recommends providing as much information related to anticipated future activities as possible. CDFW recognizes that, pursuant to CEQA Guidelines section 15152, subdivision (c), if a Lead Agency is using the tiering process in connection with an EIR or large-scale planning approval, the development of detailed, site-specific information may not be feasible and can be deferred, in many instances, until such time as the Lead Agency prepares a future environmental document. This future environmental document would cover a project of a more limited geographical scale and is appropriate if the deferred information does not prevent adequate identification of significant effects of the planning approval at hand. The CEQA Guidelines section 15168, subdivision (c)(4) states, "Where the later activities involve site-specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were within the scope of the program EIR." Based on CEQA Guidelines section 15183.3 and associated *Appendix N Checklist*, and consistent with other program EIRs, CDFW recommends creating a procedure or checklist for evaluating subsequent project impacts on biological resources to determine if they are within the scope of the program EIR or if an additional environmental document is warranted. This checklist should be included as an attachment to the draft EIR. Future analysis should include all special-status species and sensitive natural

Mr. Trevor Hawkes  
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communities including but not limited to species considered rare, threatened, or endangered pursuant to CEQA Guidelines, section 15380.

When used appropriately, the checklist should be accompanied by enough relevant information and reasonable inferences to support a “within the scope” of the EIR conclusion. For subsequent Project activities that may affect sensitive biological resources, a site-specific analysis should be prepared by a qualified biologist to provide the necessary supporting information. In addition, the checklist should cite the specific portions of the draft EIR, including page and section references, containing the analysis of the subsequent Project activities’ significant effects and indicate whether it incorporates all applicable mitigation measures from the draft EIR.

## **REGULATORY REQUIREMENTS**

### **California Endangered Species Act and Native Plant Protection Act**

Please be advised that a CESA ITP must be obtained if the Project has the potential to result in take<sup>1</sup> of plants or animals listed under CESA or NPPA, either during construction or over the life of the Project. If the Project will impact CESA or NPPA listed species, including but not limited to those identified in **Attachment 1: Special-Status Species**, early consultation with CDFW is encouraged, as significant modification to the Project and mitigation measures may be required to obtain an ITP. Issuance of an ITP is subject to CEQA documentation; the CEQA document must specify impacts, mitigation measures, and a mitigation monitoring and reporting program.

CEQA requires a Mandatory Finding of Significance if a Project is likely to substantially restrict the range or reduce the population of a threatened or endangered species (Pub. Resources Code, §§ 21001, subd. (c), 21083; CEQA Guidelines, §§ 15380, 15064, & 15065). Impacts must be avoided or mitigated to less-than-significant levels unless the CEQA Lead Agency makes and supports Findings of Overriding Consideration (FOC). The Lead Agency’s FOC does not eliminate the Project proponent’s obligation to comply with CESA.

### **Lake and Streambed Alteration**

CDFW requires an LSA Notification, pursuant to Fish and Game Code section 1600 et seq., for Project activities affecting lakes or streams and associated riparian habitat. Notification is required for any activity that may substantially divert or obstruct the natural flow; change or use material from the bed, channel, or bank including associated riparian or wetland resources; or deposit or dispose of material where it may pass into a river, lake, or stream. Work within ephemeral streams, drainage ditches, washes,

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<sup>1</sup> Take is defined in Fish and Game Code section 86 as hunt, pursue, catch, capture, or kill, or attempt any of those activities.

Mr. Trevor Hawkes  
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watercourses with a subsurface flow, and floodplains are subject to notification requirements. In addition, infrastructure installed beneath such aquatic features, such as through hydraulic directional drilling, is also subject to notification. CDFW, as a responsible agency under CEQA, will consider the EIR for the Project. CDFW may not execute the final LSA Agreement until it has complied with CEQA as the responsible agency.

### **Nesting Birds**

CDFW also has authority over actions that may disturb or destroy active nest sites or take birds. Fish and Game Code sections 3503, 3503.5, and 3513 protect birds, their eggs, and nests. Migratory birds are also protected under the federal Migratory Bird Treaty Act.

### **Fully Protected Species**

Fully Protected species, including those listed in **Attachment 1**, may not be taken or possessed at any time (Fish & G. Code, §§ 3511, 4700, 5050, & 5515).

### **ENVIRONMENTAL SETTING**

The draft EIR should provide sufficient information regarding the environmental setting ("baseline") to understand the Project's, and its alternative's (if applicable), potentially significant impacts on the environment (CEQA Guidelines, §§ 15125 & 15360).

CDFW recommends that the draft EIR provide baseline habitat assessments for special-status plant, fish, and wildlife species located and potentially located within the Project area and surrounding lands, including but not limited to all rare, threatened, or endangered species (CEQA Guidelines, § 15380). The draft EIR should describe aquatic habitats, such as wetlands, vernal pools, and/or waters of the U.S. or State, and any sensitive natural communities or riparian habitat occurring on or adjacent to the Project site (for sensitive natural communities see: <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities#sensitive%20natural%20communities>). Fully protected, threatened or endangered, and other special-status species that are known to occur, or have the potential to occur in or near the Project area, include but are not limited to, those listed in **Attachment 1**.

Habitat descriptions and the potential for species occurrence should include information from multiple sources, such as aerial imagery; historical and recent survey data; field reconnaissance; scientific literature and reports; the U.S. Fish and Wildlife Service's (USFWS) Information, Planning, and Consultation System; findings from positive occurrence databases such as the California Natural Diversity Database (CNDDB); and

Mr. Trevor Hawkes  
County of Napa  
February 22, 2022  
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sensitive natural community information available on the Napa County vegetation map<sup>2</sup>. Based on the data and information from the habitat assessment, the draft EIR should adequately assess which special-status species are likely to occur on or near the Project site, and whether they could be impacted by the Project.

CDFW recommends that prior to Project implementation, surveys be conducted for special-status species with potential to occur, following recommended survey protocols if available. Survey and monitoring protocols and guidelines are available at:

<https://wildlife.ca.gov/Conservation/Survey-Protocols>.

Botanical surveys for special-status plant species, including those with a California Rare Plant Rank (<http://www.cnps.org/cnps/rareplants/inventory/>), must be conducted during the blooming period for all species potentially impacted by the Project within the Project area and adjacent habitats that may be indirectly impacted by, for example, changes to hydrology, and require the identification of reference populations. More than one year of surveys may be necessary given environmental conditions. Please refer to CDFW protocols for surveying and evaluating impacts to rare plants, and survey report requirements (<https://wildlife.ca.gov/Conservation/Plants>).

## **IMPACT ANALYSIS AND MITIGATION MEASURES**

The draft EIR should discuss all direct and indirect impacts (temporary and permanent), including reasonably foreseeable impacts, that may occur with implementation of the Project (CEQA Guidelines, §§ 15126, 15126.2, & 15358). This includes evaluating and describing impacts such as:

- Encroachments into riparian habitats, drainage ditches, wetlands, or other sensitive areas.
- Potential for impacts to special-status species or sensitive natural communities.
- Loss or modification of breeding, nesting, dispersal, and foraging habitat, including vegetation removal, alteration of soils and hydrology, and removal of habitat structural features (e.g., snags, rock outcrops, overhanging banks).
- Permanent and temporary habitat disturbances associated with ground disturbance, noise, lighting, reflection, air pollution, traffic, or human presence.

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<sup>2</sup> The Napa County vegetation layer is available on CDFW's Biogeographic Information and Observation System (BIOS). The layer title is "Vegetation – Napa County Update 2016 [ds2899]." <https://apps.wildlife.ca.gov/bios/?bookmark=940>

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County of Napa  
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- Obstruction of movement corridors, fish passage, or access to water sources and other core habitat features.

The draft EIR should also identify reasonably foreseeable future projects in the Project vicinity, disclose any cumulative impacts associated with these projects, determine the significance of each cumulative impact, and assess the significance of the Project's contribution to the impact (CEQA Guidelines, § 15355). Although a project's impacts may be less-than-significant individually, its contributions to a cumulative impact may be considerable; a contribution to a significant cumulative impact, e.g., reduction of habitat for a special-status species, should be considered cumulatively considerable.

Based on the comprehensive analysis of the direct, indirect, and cumulative impacts of the Project, the CEQA Guidelines direct the Lead Agency to consider and describe all feasible mitigation measures to avoid potentially significant impacts in the draft EIR, and mitigate potentially significant impacts of the Project on the environment (CEQA Guidelines, §§ 15021, 15063, 15071, 15126.4 & 15370). This includes a discussion of impact avoidance and minimization measures for special-status species, which are recommended to be developed in early consultation with CDFW, USFWS, and the National Marine Fisheries Service. Project-specific measures should be incorporated as enforceable Project conditions to reduce impacts to biological resources to less-than-significant levels.

Fully protected species such as those listed in **Attachment 1**, may not be taken or possessed at any time (Fish & G. Code, §§ 3511, 4700, 5050, & 5515). Therefore, the draft EIR should include measures to ensure complete avoidance of these species.

## ENVIRONMENTAL DATA

CEQA requires that information developed in EIRs and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, subd. (e)). Accordingly, please report any special-status species and natural communities detected during Project surveys to CNDDDB. The CNDDDB online field survey form and other methods for submitting data can be found at: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at: <https://wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

## FILING FEES

CDFW anticipates that the Project will have an impact on fish and/or wildlife, and assessment of filing fees is necessary (Fish & G. Code, § 711.4; Pub. Resources Code, § 21089). Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW.

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If you have any questions, please contact Amanda Culpepper, Environmental Scientist, at (707) 428-2075 or [Amanda.Culpepper@wildlife.ca.gov](mailto:Amanda.Culpepper@wildlife.ca.gov), or Melanie Day, Senior Environmental Scientist (Supervisory), at (707) 210-4415 or [Melanie.Day@wildlife.ca.gov](mailto:Melanie.Day@wildlife.ca.gov).

Sincerely,

DocuSigned by:

*Erin Chappell*

B77F9A6211EF486

Erin Chappell  
Regional Manager  
Bay Delta Region

Attachment 1: Special-Status Species

ec: State Clearinghouse (SCH No. 2022010309)

Jillian Feyk-Miney, Environmental Science Associates, [jfeyk-miney@esassoc.com](mailto:jfeyk-miney@esassoc.com)

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### Attachment 1: Special-Status Species

| Scientific Name                            | Common Name                   | Status  |
|--|-------------------------------|---|
| <b>Birds</b>                               |                               |   |
| <i>Rallus obsoletus obsoletus</i>          | California Ridgway's rail     | CESA and Endangered Species Act (ESA) listed as endangered; California Fully Protected species      |
| <i>Buteo swainsoni</i>                     | Swainson's hawk               | CESA listed as threatened   |
| <i>Laterallus jamaicensis coturniculus</i> | California black rail         | CESA listed as threatened; California Fully Protected species                                       |
| <i>Strix occidentalis caurina</i>          | northern spotted owl          | CESA and ESA listed as threatened   |
| <i>Agelaius tricolor</i>                   | tricolored blackbird          | CESA listed as threatened   |
| <i>Riparia riparia</i>                     | bank swallow                  | CESA listed as threatened   |
| <i>Haliaeetus leucocephalus</i>            | bald eagle                    | CESA listed as endangered; California Fully Protected species; Bald and Golden Eagle Protection Act |
| <i>Charadrius nivosus nivosus</i>          | western snowy plover          | ESA listed as threatened; California Species of Special Concern (SSC)                               |
| <i>Athene cunicularia</i>                  | burrowing owl                 | SSC   |
| <i>Aquila chrysaetos</i>                   | golden eagle                  | California Fully Protected species; Bald and Golden Eagle Protection Act                            |
| <i>Progne subis</i>                        | purple martin                 | SSC   |
| <i>Circus hudsonius</i>                    | northern harrier              | SSC   |
| <i>Geothlypis trichas sinuosa</i>          | saltmarsh common yellowthroat | SSC   |
| <i>Melospiza melodia samuelis</i>          | San Pablo song sparrow        | SSC   |
| <i>Elanus leucurus</i>                     | white-tailed kite             | California Fully Protected species  |



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|   |  |   |
|---|--|---|
| <i>Falco peregrinus anatum</i>            | American peregrine falcon                                | California Fully Protected species                                    |
| <b>Fish</b>                               |  |   |
| <i>Spirinchus thaleichthys</i>            | longfin smelt  | CESA listed as threatened; candidate for ESA listing                  |
| <i>Oncorhynchus mykiss irideus</i> pop. 8 | central California coast steelhead                       | ESA listed as threatened  |
| <b>Amphibians</b>                         |  |   |
| <i>Rana draytonii</i>                     | California red-legged frog                               | ESA listed as threatened; SSC   |
| <i>Rana boylei</i>                        | foothill yellow-legged frog, northwest/north coast clade | SSC   |
| <i>Dicamptodon ensatus</i>                | California giant salamander                              | SSC   |
| <b>Mammals</b>                            |  |   |
| <i>Reithrodontomys raviventris</i>        | salt-marsh harvest mouse                                 | CESA and ESA listed as endangered; California Fully Protected species |
| <i>Corynorhinus townsendii</i>            | Townsend's big-eared bat                                 | SSC   |
| <i>Antrozous pallidus</i>                 | pallid bat   | SSC   |
| <i>Lasiurus blossevillii</i>              | western red bat  | SSC   |
| <i>Taxidea taxus</i>                      | American badger  | SSC   |
| <i>Sorex ornatus sinuosus</i>             | Suisun shrew   | SSC   |
| <b>Reptiles</b>                           |  |   |
| <i>Emys marmorata</i>                     | western pond turtle                                      | SSC   |

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| <b><i>Invertebrates</i></b>                    |                                   |   |
|--|-----------------------------------|---|
| <i>Syncaris pacifica</i>                       | California freshwater shrimp      | CESA and ESA listed as endangered   |
| <i>Branchinecta lynchi</i>                     | vernal pool fairy shrimp          | ESA listed as threatened; California Terrestrial and Vernal Pool Invertebrate of Conservation Priority (ICP) <sup>3</sup> |
| <i>Desmocerus californicus dimorphus</i>       | valley elderberry longhorn beetle | ESA listed as threatened; ICP   |
| <i>Bombus caliginosus</i>                      | obscure bumble bee                | ICP   |
| <i>Bombus occidentalis</i>                     | western bumble bee                | ICP   |
| <b><i>Plants</i></b>                           |                                   |   |
| <i>Lasthenia burkei</i>                        | Burke's goldfields                | CESA and ESA listed as endangered; California Rare Plant Rank (CRPR) <sup>4</sup> 1B.1                                    |
| <i>Chloropyron molle</i> ssp. <i>molle</i>     | soft salty bird's-beak            | NPPA listed as rare; ESA listed as endangered; CRPR 1B.2  |
| <i>Astragalus claranus</i>                     | Clara Hunt's milk-vetch           | CESA listed as threatened; ESA listed as endangered; CRPR1B.1   |
| <i>Castilleja affinis</i> var. <i>neglecta</i> | Tiburon paintbrush                | CESA listed as threatened; ESA listed as endangered; CRPR 1B.2  |
| <i>Limnanthes vinculans</i>                    | Sebastopol meadowfoam             | CESA and ESA listed as endangered; CRPR 1B.1  |
| <i>Plagiobothrys strictus</i>                  | Calistoga                         | CESA listed as threatened; ESA listed as  |

<sup>3</sup> The list of California Terrestrial and Vernal Pool Invertebrates of Conservation Priority was collated during CDFW's Scientific Collecting Permit rulemaking process:

<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=157415&inline>

<sup>4</sup> CRPR 1B plants are considered rare, threatened, or endangered in California and elsewhere while CRPR 4 plants are considered watch list plants that have a limited distribution in California. Further information on CRPR ranks is available in CDFW's *Special Vascular Plants, Bryophytes, and Lichens List* (<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109383&inline>) and on the California Native Plant Society website (<https://www.cnps.org/rare-plants/cnps-rare-plant-ranks>).

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|   |                          |  |
|---|--------------------------|--|
|   | popcornflower            | endangered; CRPR 1B.1  |
| <i>Poa napensis</i>                                   | Napa blue grass          | CESA and ESA listed as endangered; CRPR 1B.1                   |
| <i>Lilaeopsis masonii</i>                             | Mason's lilaeopsis       | NPPA listed as rare; CRPR 1B.1                                 |
| <i>Navarretia leucocephala</i> ssp. <i>pauciflora</i> | few-flowered navarretia  | CESA listed as threatened; ESA listed as endangered; CRPR 1B.1 |
| <i>Lasthenia conjugens</i>                            | Contra Costa goldfields  | ESA listed as endangered; CRPR 1B.1                            |
| <i>Sidalcea keckii</i>                                | Keck's checkerbloom      | ESA listed as endangered; CRPR 1B.1                            |
| <i>Trifolium amoenum</i>                              | two-fork clover          | ESA listed as endangered; CRPR 1B.1                            |
| <i>Amorpha californica</i> var. <i>napensis</i>       | Napa false indigo        | CRPR 1B.2  |
| <i>Amsinckia lunaris</i>                              | bent-flowered fiddleneck | CRPR 1B.2  |
| <i>Carex lyngbyei</i>                                 | Lyngbye's sedge          | CRPR 2B.2  |
| <i>Polygonum marinense</i>                            | Marin knotweed           | CRPR 3.1   |
| <i>Rhynchospora californica</i>                       | California beaked-rush   | CRPR 1B.1  |
| <i>Sagittaria sanfordii</i>                           | Sanford's arrowhead      | CRPR 1B.2  |
| <i>Sidalcea hickmanii</i> ssp. <i>napensis</i>        | Napa checkerbloom        | CRPR 1B.1  |

**From:** [Yvonne Baginski](#)  
**To:** [Hawkes, Trevor](#)  
**Subject:** Fwd: Draft of letter for the housing plan  
**Date:** Friday, February 25, 2022 4:52:07 PM

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[External Email - Use Caution]

-----  
I am especially concerned about the effects of drought, hotter/drier weather and wildfire risks in Napa County. As streams, creeks and reservoirs turn to dust, and water becomes a fought after commodity, I am especially concerned about the impact of any further residential development in county, rural areas. Frankly, the water and dedicated utility services are not available.

We have already lost a significant amount of rural forested and grassland property due to two devastating wildfires in the past three years. The designation of the Ag Preserve further limits options, and most of the rural land is now owned privately.

Public county lands are limited and the development costs would be significant.

Low income family housing would also need to be near bus lines, schools and shopping centers. We are very restricted in where building is even possible.

The property in the Carneros Region is near enough to a fault line that the Stonebridge School had to relocate. It is also a too far from services. That property would simply be not feasible for building.

Lake Berryessa is also a significant distance from city services, and would be a hardship for low-income families to live so far away from hospitals, schools, etc. The cost of gasoline, for example, and the driving time alone would be difficult to afford.

Other properties need to be looked at for their environmental impact in an ever-shrinking scenario of open space and wildlife land use. I would support that any proposed property be thoroughly evaluated with an Environmental Impact Report and serious examination of such issues as grassland destruction, automobile pollution, infrastructure, services and water needs be considered.

I would also like to propose that ANY new development in Napa County would be required to do a landscape review, so that all installed landscaping be drought tolerant, and native vegetation. Landscaping would need approval from a Native/drought tolerant landscaping committee. I believe this is extremely important in any future plantings. I would include this requirement for all commercial and residential buildings.

Thank you for this opportunity to comment.

Yvonne Baginski, Napa  
3205 Montclair Ave.  
[yvonnebaginski@gmail.com](mailto:yvonnebaginski@gmail.com)

# **Napa County**

1195 THIRD STREET  
THIRD FLOOR  
NAPA, CA 94559



## **Agenda**

**Wednesday, February 16, 2022**

**9:00 AM**

**Board of Supervisors Chambers  
1195 Third Street, Third Floor**

### **Planning Commission**

*Chair Megan Dameron, District 5  
Commissioner Joelle Gallagher, District 1  
Commissioner Dave Whitmer, District 2  
Commissioner Anne Cottrell, District 3  
Commissioner Andrew Mazotti, District 4*

*Director David Morrison  
Commission Counsel Laura Anderson  
Commission Secretary:  
Alexandria Quackenbush*

**HOW TO WATCH OR LISTEN TO THE NAPA COUNTY PLANNING COMMISSION MEETING:**

To participate in the Napa County Planning Commission meeting, the public are invited to observe and address the Commission telephonically or electronically. Instructions for public participation are below:

The Napa County Planning Commission will continue to meet pursuant to the adopted calendar located at the following link: 2022 Draft PC Regular Meeting Schedule.pub ([countyofnapa.org](http://countyofnapa.org))

**\*\*IN-PERSON ATTENDANCE AT THE NAPA COUNTY PLANNING COMMISSION MEETINGS ARE LIMITED AND FACE MASKS MUST BE WORN AT ALL TIMES WHILE IN THE BOARD CHAMBERS\*\***

**PLEASE SEE INSTRUCTIONS BELOW FOR VIRTUAL/TELEPHONIC ATTENDANCE.**

1. Watch on your TV - Napa Valley TV Channel 28.
2. Listen on your cell phone - via Zoom at 1-669-900-6833 Enter Meeting ID 991-4190-6645 once you have joined the meeting.
3. Watch via the Internet - view the Live Stream via Zoom by <https://www.zoom.us/join>, then enter Meeting ID 991-4190-6645.
4. Via Granicus by [http://napa.granicus.com/ViewPublisher.php?view\\_id=21](http://napa.granicus.com/ViewPublisher.php?view_id=21)

You may submit public comment on any item that appears on the agenda, or general public comment for any item or issue that does not appear on the agenda, as follows:

**Via Email**

Send your comment to the following email address: [Planningcommissionclerk@countyofnapa.org](mailto:Planningcommissionclerk@countyofnapa.org). Please provide your name and indicate the agenda item upon which you are commenting. Emails received will not be read aloud but will still become part of the public record.

**Online**

1. Use the Zoom attendee link: <https://countyofnapa.zoom.us/j/99141906645>. Make sure the browser is up-to-date.
2. Enter an email address and following naming convention:  
Item #, First Name Last Name
3. When the Chair calls for the item on which you wish to speak, click "raise hand." Mute all other audio before speaking to avoid feedback.
4. When called, please limit your remarks to three minutes. After the comment, your microphone will be muted.

**By Phone**

1. Call the Zoom phone number and enter the webinar ID: 1-669-900-6833 Enter Meeting ID 991 4190 6645



2. When the Chair calls for the item on which you wish to speak, press \*9 to raise a hand. \*\*Please note that phone numbers in their entirety will be visible online while speakers are speaking.\*\*
3. Please provide your name and the agenda item on which you are commenting. Calls will be heard in the order received.

The above-identified measures exceed all legal requirements for participation and public comment, including those imposed by the Ralph M. Brown Act and Executive Order AB361. If you have any questions, contact us via telephone at (707) 253-4417 or email - [Planningcommissionclerk@countyofnapa.org](mailto:Planningcommissionclerk@countyofnapa.org).

1. **CALL TO ORDER; ROLL CALL**
2. **PLEDGE OF ALLEGIANCE**
3. **CITIZEN COMMENTS AND RECOMMENDATIONS**
4. **APPROVAL OF MINUTES**

**The Clerk of the Commission request approval of Minutes for the meeting held on:  
February 2, 2022 (All Commissioners present)**

5. **AGENDA REVIEW**
6. **DISCLOSURES**
7. **PUBLIC HEARING ITEMS - None.**
8. **ADMINISTRATIVE ITEMS**

**HOUSING ELEMENT UPDATE EIR SCOPING SESSION**

**[22-257](#)**

Request: That the Planning Commission conduct a public scoping session and take public testimony on items to be addressed in an Environmental Impact Report (EIR) currently being prepared for Napa County's Housing Element Update.

Recommendation: Conduct public scoping session and receive public and Commission testimony on items to be addressed in the EIR.

Staff Contact: Trevor Hawkes, Planner III, 707-253-4388 or [trevor.hawkes@countyofnapa.org](mailto:trevor.hawkes@countyofnapa.org).

**Attachments:** [Notice of Preparation of a Draft Environmental Impact Report.pdf](#)  
[Item 8A Correspondence.pdf](#)

**9. DEPUTY DIRECTOR'S REPORT**

- DISCUSSION OF ITEMS FOR THE MARCH 2, 2022 REGULAR MEETING
- BOARD OF SUPERVISORS ACTIONS
- OTHER DEPARTMENT ACTIVITIES
- CODE COMPLIANCE REPORT
- ZONING ADMINISTRATOR ACTIONS
- OTHER PENDING PROJECTS' STATUS

**10. COMMISSIONER COMMENTS/COMMITTEE REPORTS****11. PROJECTS REQUIRING COMMISSION FOLLOW-UP REVIEW**

Refer to "PBES Current Projects" Web Page <https://www.countyofnapa.org/591/Current-Projects>

**12. ADJOURNMENT**

I HEREBY CERTIFY THAT THE AGENDA FOR THE ABOVE STATED MEETING WAS POSTED AT A LOCATION FREELY ACCESSIBLE TO MEMBERS OF THE PUBLIC AT THE NAPA COUNTY ADMINISTRATIVE BUILDING, 1195 THIRD STREET, NAPA, CALIFORNIA ON 2/8/2022 BY 5:00 P.M. A HARDCOPY SIGNED VERSION OF THE CERTIFICATE IS ON FILE WITH THE CLERK OF THE COMMISSION AND AVAILABLE FOR PUBLIC INSPECTION.

ALEXANDRIA QUACKENBUSH(By e-signature)

Alexandria Quackenbush, Clerk of the Commission



# Napa County

1195 THIRD STREET  
THIRD FLOOR  
NAPA, CA 94559

## Board Agenda Letter

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Planning Commission

**Agenda Date:** 2/16/2022

**File ID #:** 22-257

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**TO:** Napa County Planning Commission  
**FROM:** David Morrison, Planning, Building and Environmental Services Director  
**REPORT BY:** Trevor Hawkes, Planning Division  
**SUBJECT:** Housing Element Update EIR Scoping Session

---

### **RECOMMENDATION**

#### HOUSING ELEMENT UPDATE EIR SCOPING SESSION

**Request:** That the Planning Commission conduct a public scoping session and take public testimony on items to be addressed in an Environmental Impact Report (EIR) currently being prepared for Napa County's Housing Element Update.

**Recommendation:** Conduct public scoping session and receive public and Commission testimony on items to be addressed in the EIR.

**Staff Contact:** Trevor Hawkes, Planner III, 707-253-4388 or [trevor.hawkes@countyofnapa.org](mailto:trevor.hawkes@countyofnapa.org).

### **EXECUTIVE SUMMARY**

In 2021 work began on the required Housing Element Update (Update) for the State's Sixth Cycle Planning Period to address housing needs in Napa County for the years 2023 through 2031. The Update must be completed by the County and certified by the State Department of Housing and Community Development (HCD) by January 31, 2023. The Update is subject to the California Environmental Quality Act (CEQA), and on January 24, 2022, a Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR) was distributed for a 30-day public review period. Staff seeks Commission and public input on environmental topics to be addressed in the pending EIR.

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**ENVIRONMENTAL IMPACT**

ENVIRONMENTAL DETERMINATION: Draft EIR in preparation. An NOP was issued on January 24, 2022. Pursuant to CEQA and State CEQA guidelines Section 15064, the discussion of potential effects on the environment in the EIR shall be focused on those impacts that the County has determined may be potentially significant. The County has determined that the project may have significant effects on the environment in the following areas: Aesthetics, Agricultural Resources, Air Quality and Greenhouse Gas Emissions, Biological Resources, Cultural and Historic Resources, Geology and Soils, Energy, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Transportation/Traffic, Tribal Cultural Resources, Utilities and Services Systems, and Wildfires. This study session will provide direction to Staff to enable preparation of the CEQA documentation for the Update project and members of the Commission, public and public agencies are invited to provide comments as to the scope and content of the EIR. The 30-day public comment period closes February 25, 2022.

**BACKGROUND AND DISCUSSION**

Napa County proposes to prepare and adopt a comprehensive update to the County's Housing Element for the State's Sixth Cycle Planning Period to address housing needs for the years 2023 through 2031. As part of the Update, the County also proposes to prepare and adopt limited amendments to other elements of the General Plan, the County's zoning map and regulations, and to improve consistency of the Safety Element with the 2020 Napa County Multi-Jurisdictional Hazard Mitigation Plan and recent changes in state law. The Update is required to be completed and certified by January 31, 2023.

Amendment of the County's General Plan is a discretionary action subject to CEQA. On January 24, 2022, an NOP was distributed to inform agencies and interested parties of the County's intention to prepare a Draft EIR in order to consider the environmental impacts of the Update. Consistent with CEQA Guidelines Section 15168, the County will draft a program EIR, which will allow the County to consider impacts of adoption and implementation of the Update as well as program wide mitigation measures. The NOP comment period runs from January 24, 2022 through February 25, 2022.

The County's Housing Element Advisory Committee (HEAC) has been formed and the committee has held two meetings to date (October 26, 2021 and November 15, 2021). A minimum of four additional meetings of the HEAC are planned throughout the remainder of the schedule. On December 7, 2021, Staff received comments and direction from the Board of Supervisors (BOS) on what percentage of the County's Regional Housing Needs Allocation (RHNA) for this update cycle should be transferred through existing RHNA transfer agreements with the cities of St. Helena, Napa, and American Canyon. On December 15, 2021, Staff received comments and direction from the Planning Commission on housing site selection criteria and preliminary proposed sites. Finally on January 20, 2022, Staff conducted a community workshop to solicit input from the public on housing needs, services, opportunities and constraints within the unincorporated county.

Most recently, and on direction provided by the BOS, Staff has submitted a RHNA allocation transfer request,

pursuant to Government Code Section 65584.07, to the Association of Bay Area Governments, seeking to transfer 90% of the County's RHNA allocation through existing transfer agreements to the cities of St. Helena, Napa and American Canyon. A breakdown of the transfer allocation of units by income group is provided in Attachment A, Table 3. Once approved the County will be able to use this revised final RHNA allocation and the potential housing sites under consideration to develop the County's housing inventory for this Update. Staff continues to develop and consider potential housing sites through analysis and community input.

At this time Staff requests meaningful input on the scope and content of the EIR, including mitigation measures and alternatives that should be considered.

#### Attachments

A - Notice of Preparation of a Draft Environmental Impact Report



A Tradition of Stewardship  
A Commitment to Service

**Planning, Building & Environmental Services**

1195 Third Street, Suite 210  
Napa, CA 94559  
[www.countyofnapa.org](http://www.countyofnapa.org)

**David Morrison**  
Director

## NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT

Date: January 24, 2022

To: Agencies and Interested Parties

From: Napa County Planning, Building, and Environmental Services Department

Subject: Notice of Preparation of a Draft Environmental Impact Report for the Napa County Housing Element Update

Review Period: January 24, 2022 to 5:00 PM on February 25, 2022

Napa County (County) proposes to prepare and adopt a comprehensive update to the Housing Element (of the General Plan) for Napa County for the period from January 2023 to January 2031 as required by State law. As part of the Housing Element Update (HEU or the project), the County also proposes to prepare and adopt limited amendments to other elements (or chapters) of the General Plan and the County's zoning map/regulations to maintain consistency with the updated Housing Element, and to improve consistency of the Safety Element with the *2020 Napa County Multi-Jurisdictional Hazard Mitigation Plan* and comply with recent changes in State law.

Amendment of the County's General Plan is a discretionary action subject to the California Environmental Quality Act (CEQA). The County will serve as the lead agency under CEQA and will prepare an environmental impact report (EIR) for the project to satisfy the requirements of CEQA (Public Resources Code [PRC] Section 21000 et seq.). Consistent with CEQA Guidelines Section 15168, the EIR will be a program EIR, allowing the County to consider the impacts of adoption and implementation of the HEU as well as program wide mitigation measures. Subsequent discretionary actions would be evaluated to determine whether their impacts fall within the scope of the program EIR or whether additional environmental review is required.

### PURPOSE OF THIS NOTICE OF PREPARATION

In accordance with the California Code of Regulations (CCR) Section 15082, the County has prepared this notice of preparation (NOP) to inform agencies and interested parties that an EIR will be prepared for the above-referenced project. The purpose of an NOP is to provide information about the project and its potential environmental impacts sufficient to allow agencies and interested parties the opportunity to provide a meaningful response related to the scope and content of the EIR, including mitigation measures and alternatives that should be considered (CCR Section 15082[b]). The project location, description, and potential environmental effects are summarized below.

---

|                   |                   |                            |                      |                    |
|-------------------|-------------------|----------------------------|----------------------|--------------------|
| Planning Division | Building Division | Engineering & Conservation | Environmental Health | Parks & Open Space |
| (707) 253-4417    | (707) 253-4417    | (707) 253-4417             | (707) 253-4471       | (707) 259-5933     |



## PROJECT LOCATION

Napa County is located in the northern San Francisco Bay area, approximately 50 miles due west of Sacramento, California. The County is bordered by Lake County to the north, Yolo and Solano County to the east, Sonoma County to the west, and San Pablo Bay to the south (Exhibit 1). The planning area for the Housing Element Update is the same planning area that was considered by the 2008 General Plan, which encompasses all unincorporated land in Napa County (Exhibit 2). The unincorporated County includes approximately 9,022 residential dwelling units and comprises 789 square miles.

## BACKGROUND

The Napa County General Plan was comprehensively updated in 2008 and contains goals and policies that guide land use decisions in unincorporated Napa County. The General Plan contains eight principal chapters or “elements” including an Agricultural Preservation & Land Use Element, a Housing Element, and a Safety Element. The County’s Housing Element was last updated and adopted in 2014.

State law requires local jurisdictions to update their housing elements on a regular schedule and to maintain consistency between the housing element and other elements of the general plan. Each city and county in the Bay Area must update their current housing element to the satisfaction of the State Department of Housing and Community Development (HCD) by January 31, 2023 and must plan for a number of new housing units referred to as their Regional Housing Needs Allocation (RHNA).

A RHNA is generally assigned to each jurisdiction by the Association of Bay Area Government (ABAG) Council of Governments for the eight year planning period and includes housing units at various levels of affordability (very low income, low income, moderate income, and above moderate). The County’s RHNA as of December 2021 is shown in Table 1, below and is subject to modification via transfer agreements with incorporated jurisdictions as described further below.

| TABLE 1. NAPA COUNTY REGIONAL HOUSING NEEDS (RHNA) ALLOCATION AS OF DECEMBER 2021 <sup>a</sup>  |                       |     |          |                |             |
|---|-----------------------|-----|----------|----------------|-------------|
|   | Units by Income Group |     |          |                | Total Units |
|   | Very Low              | Low | Moderate | Above Moderate |             |
| RHNA Allocation <sup>a</sup>  | 369                   | 213 | 120      | 312            | 1,014       |
| % of Total  | 36%                   | 21% | 12%      | 31%            | 100%        |
| Notes:<br><sup>a</sup> The RHNA allocation shown here was adopted by ABAG on December 16, 2021 and may be modified via transfers pursuant to California Government Code Section 65584.07. |                       |     |          |                |             |

Source: ABAG, December 2021.

Over the past 12 years, the County has entered into agreements with the City of American Canyon, the City of Napa, and the City of St. Helena, that would allow the County to transfer portions of its RHNA allocation to these jurisdictions pursuant to California Government Code Section 65584.07. These agreements reflect a shared commitment by the County and incorporated jurisdictions to agricultural preservation and urban centered growth, and the County is in the process of requesting ABAG’s approval of RHNA transfers on the basis of these agreements, which are shown in Table 2 below.

| TABLE 2. RHNA TRANSFER AGREEMENTS AVAILABLE FOR USE BY THE COUNTY <sup>a</sup> |                                    |     |          |                |                  |
|--|------------------------------------|-----|----------|----------------|------------------|
| Jurisdiction and Date of Agreement   | Units by Income Group <sup>b</sup> |     |          |                | Total Units      |
|  | Very Low                           | Low | Moderate | Above Moderate |                  |
| City of Napa (December 17, 2019)   | 295                                | 170 | 96       | 250            | 811              |
| City of American Canyon (May 25, 2010)   | 46                                 | 38  | 46       | 56             | 168 <sup>c</sup> |
| City of American Canyon (May 2, 2017)  | 11                                 | 6   | 4        | 9              | 30               |
| City of St. Helena (June 26, 2017)   | 1                                  | 0   | 0        | 1              | 2                |
| Total Transfers Available  | 374                                | 216 | 122      | 317            | 1,029            |

Notes:  
<sup>a</sup>Transfer agreements reflect agreement by the County and an incorporated jurisdiction to use the RHNA transfer process contained in Government Code Section 65584.07. Transfers are subject to ABAG approval during the period between ABAG's adoption of the final RHNA allocation in December 2021 and January 2031.  
<sup>b</sup>Except in the City of American Canyon May 25, 2010 agreement, the distribution of units by income group is not specified within the agreements and is presented here based on the distribution of units in the County's December 2021 RHNA.  
<sup>c</sup>Numbers in this agreement add up to 186, but the agreement specifically references 168 units.

Source: Napa County, January 2022

The County's request for a transfer pursuant to Government Code Section 65584.07 will seek to transfer approximately 90% of the County's RHNA based on the executed agreements and factors/circumstances that will be outlined in the request. If approved by ABAG, the transfers will modify the County's RHNA as shown in Table 3 below and the Housing Element Update will plan for that RHNA plus a buffer.

| TABLE 3. NAPA COUNTY REGIONAL HOUSING NEEDS (RHNA) ALLOCATION BASED ON PROPOSED TRANSFERS <sup>a</sup> |                       |     |          |                |             |
|--|-----------------------|-----|----------|----------------|-------------|
|  | Units by Income Group |     |          |                | Total Units |
|  | Very Low              | Low | Moderate | Above Moderate |             |
| December 2021 RHNA Allocation  | 369                   | 213 | 120      | 312            | 1,014       |
| % of Total   | 57%                   |     | 43%      |                | 100%        |
| Proposed Transfers <sup>b</sup>  | 324                   | 197 | 106      | 281            | 908         |
| Revised RHNA <sup>a</sup> Allocation if Transfers are Approved   | 45                    | 16  | 14       | 31             | 106         |
| % of Total   | 57%                   |     | 43%      |                | 100%        |

Notes:  
<sup>a</sup>The County is in the process of requesting transfers pursuant to California Government Code Section 65584.07 which – if approved by ABAG – would modify the County's RHNA as shown.  
<sup>b</sup>The proposed transfers would be based on signed agreements between the County and the cities of American Canyon, Napa, and St. Helena, although they would not transfer all of the units allowed for under all agreements.

Source: Environmental Science Associates, December 2021.

## PROJECT DESCRIPTION

The project analyzed in the EIR would update the County's Housing Element, including goals, objectives, policies, and implementation programs that address the maintenance, preservation, improvement, and development of housing in unincorporated Napa County. In addition, the HEU would identify sites appropriate for the development of multifamily housing, and the County would rezone those sites as necessary to meet the requirements of State law. The project would

also include amendments to other elements of the County General Plan in order to maintain internal consistency, to improve consistency of the Safety Element with the *2020 Napa County Multi-Jurisdictional Hazard Mitigation Plan*, and to comply with recent changes in State law.

The HEU will be the subject of community outreach and will evolve based on community input before being submitted to HCD for review and before being considered for adoption by the County Board of Supervisors prior to January 31, 2023. Given the time needed to prepare an EIR, certain assumptions are being made about the contents of the HEU in order to initiate the environmental review process. Specifically, the County assumes and the EIR will analyze an HEU that would meet all legal requirements and:

1. include an updated housing needs assessment;
2. include updated goals, policies, and programs that address the maintenance, preservation, improvement, and development of housing and affirmatively further fair housing;
3. include a housing inventory that meets the County's final RHNA following transfers pursuant to Government Code Section 65584.07 and provide a buffer of additional housing development capacity, including sites for multifamily housing development within the unincorporated area;
4. require limited amendments to the Agricultural Preservation and Land Use Element of the General Plan as/if needed to acknowledge the housing sites;
5. require limited amendments to the County's zoning map and zoning ordinance to rezone the housing site(s); and
6. require limited amendments to the Safety Element of the General Plan to improve consistency of the Safety Element with the *2020 Napa County Multi-Jurisdictional Hazard Mitigation Plan* and comply with recent changes in State law.

The County proposes to use a variety of methods to meet its RHNA requirement, including continued development of single family homes and accessory dwelling units (ADU), a program to encourage development of farmworker housing units, and identification of multifamily housing sites.

The County's General Plan and zoning ordinance permits construction of one single family home on each legal lot, with the exception of areas that are zoned for industrial use. HCD guidance suggests that the County's HEU may assume development of market rate single family homes on currently vacant and buildable parcels.

The County's zoning also permits one Accessory Dwelling Unit (ADU) and one Junior Accessory Dwelling Unit (JADU) per parcel within residentially and Agricultural Watershed (AW) zoning. One JADU is permitted in Agricultural Preservation (AP) zoning. HCD guidance suggests that the County may assume that ADUs and JADUs continue to develop at the same pace and affordability levels that has occurred over the last three years, yielding approximately 72 units at a range of income levels over the eight year planning period of the HEU.

The County's zoning ordinance permits development of up to 12 individual farmworker housing units as an allowed use by right on every legal parcel in agricultural zones. The County is seeking to encourage additional development of farmworker units, is participating in ABAG's Farmworker Collaborative, and has not established a goal for unit production during the planning period.

The County is proposing to meet the balance of its RHNA and provide a "buffer" by identifying sites for development of multifamily housing at a minimum density of 20 dwelling units per acre. This is the "default density" considered affordable to lower income households under State law for unincorporated Napa County.

In identifying potential sites, the County is proposing to use the following screening criteria:

1. Sites must have access to existing or planned water, sewer, and other dry utilities with sufficient capacity available to support housing development; (*Source: State requirement*)
2. Sites must generally be between 0.5 and 10 acres in size; (*Source: State requirement*)

3. Sites must be located outside of areas designated Agricultural Resource or Agriculture, Watershed & Open Space as of September 28, 2007 (the date specified in Measure P, approved by the voters in November 2008). Notwithstanding this requirement, sites within an area designated Agricultural Resource or Agriculture, Watershed & Open Space may be identified for qualifying farmworker housing development and sites identified as an existing commercial establishment on General Plan *Figure AG.LU-2: Location of Parcels Subject to Policy AG/LU-45* may be identified for redevelopment.

In addition, the County's goal is to identify sites that are:

4. Located outside of high and very high fire severity zones as designated (in State Responsibility Areas) or recommended (in Local Responsibility Areas) by CalFire.
5. Located outside of Zones A through D of the applicable Airport Land Use Compatibility Plan.
6. Proximate to transit routes and/or employment opportunities and services (e.g. groceries).

Sites identified during development of the HEU will be evaluated using these criteria/goals and analyzed to determine their ability to meet State requirements plus a buffer.

An initial screening of potential sites has identified the following potential sites for additional analysis and community input:

1. Possible farmworker housing sites or incentives;
2. One or more existing housing element sites with additional incentives;
3. One or more small sites in the vicinity of Carneros Resort if utilities can be provided;
4. One or more sites between Foster Road and State Route 29 within the City of Napa Rural Urban Limit (RUL);
5. One or more sites needing State agreement (e.g. a site at Napa State Hospital);
6. The 9.8-acre Stonebridge School site in Carneros;
7. One or more sites in the Silverado Area if utilities can be provided;
8. One or more sites proximate to planned resorts at Lake Berryessa; and
9. Other sites to be identified via additional analysis and community input during preparation of the HEU.

Sites included in the HEU will be proposed for rezoning by applying the Affordable Housing Overlay Zone in Section 18.82 of the County's zoning ordinance to selected site(s) on the County's zoning map. This provision of the zoning ordinance would be amended to allow selected sites to develop at 20 dwelling units per acre without a use permit. Selected sites and HEU implementation programs may also require small adjustments to language or figures included in the Agricultural Preservation and Land Use Element of the General Plan to maintain internal consistency between the elements.

In conjunction with updates to the Housing Element itself, the project would include targeted updates to the Safety Element of the General Plan to improve consistency of the Safety Element with the *2020 Napa County Multi-Jurisdictional Hazard Mitigation Plan* and to comply with recent changes in State law.

## POTENTIAL ENVIRONMENTAL IMPACTS

Pursuant to CEQA and State CEQA Guidelines Section 15064, the discussion of potential effects on the environment in the EIR shall be focused on those impacts that the County has determined may be potentially significant. The EIR will also evaluate the cumulative impacts of the project when considered in conjunction with other related past, current, and reasonably foreseeable future projects. The County has determined that the project could result in potential environmental impacts in the following topic areas, which will be further evaluated in the EIR:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural and Historical Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Energy
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

No initial study has been prepared, however the EIR will focus on those issue areas where potentially significant impacts may occur. Feasible mitigation measures will be identified to reduce any potentially significant and significant impacts.

## ALTERNATIVES TO BE EVALUATED IN THE EIR

In accordance with the State CEQA Guidelines (CCR Section 15126.6), the EIR will describe a range of reasonable alternatives to the project that are capable of meeting most of the project's objectives and that would avoid or substantially lessen any of the significant effects of the project. The EIR will also identify any alternatives that were considered but rejected by the lead agency as infeasible and briefly explain the reasons why, and will identify the environmentally superior alternative. Among the alternatives being considered for inclusion in the EIR are the No-Project Alternative (required by CEQA), and an alternative that would include one or more different housing sites than those selected for inclusion in the HEU.

## DOCUMENTS AVAILABLE FOR PUBLIC REVIEW

This NOP is available for public review at the following locations:

Napa County Planning, Building, and  
Environmental Services Department  
1195 Third Street, Suite 210  
Napa, CA

Napa Main Library  
580 Coombs Street  
Napa, CA

St. Helena Library  
1492 Library Lane  
St. Helena, CA

This NOP is also available for public review online at <https://www.countyofnapa.org/2876/Current-Projects-Explorer> and has been provided to the Governor's Office of Planning and Research (OPR) "Clearing House" and the Napa County Clerk for posting along with a Notice of Completion.

The County is seeking input on the HEU as well as on the scope of the EIR. Project materials can be viewed online at: <https://www.countyofnapa.org/3250/2022-Housing-Element-Update>. To review materials in Spanish please contact Staff to request materials using the contact information below.

## PROVIDING COMMENTS

Agencies and interested parties may provide the County with written comments on topics to be addressed in the EIR for the project. Because of time limits mandated by State law, comments should be provided no later than 5:00 p.m. on February 25, 2022. Please send all comments to:

Napa County Planning, Building, and Environmental Services Department  
Attention: Trevor Hawkes  
1195 Third Street, Suite 210  
Napa, CA 94559  
Email: [Trevor.Hawkes@countyofnapa.org](mailto:Trevor.Hawkes@countyofnapa.org)

Agencies that will need to use the EIR when considering permits or other approvals for the project should provide the name, phone number, and email address of the appropriate contact person at the agency. Comments provided by email should include "Housing Element Update NOP Scoping Comment" in the subject line, as well as the name and physical address of the commenter in the body of the email.

All comments on environmental issues received during the public comment period will be considered and addressed in the Draft EIR, which is anticipated to be available for public review in mid-2022.

## PUBLIC SCOPING MEETING

The Napa County Planning Commission will hold a public scoping meeting to inform interested parties about the proposed project and to provide agencies and the public with an opportunity to provide comments on the scope and content of the EIR. The meeting time and location are as follows:

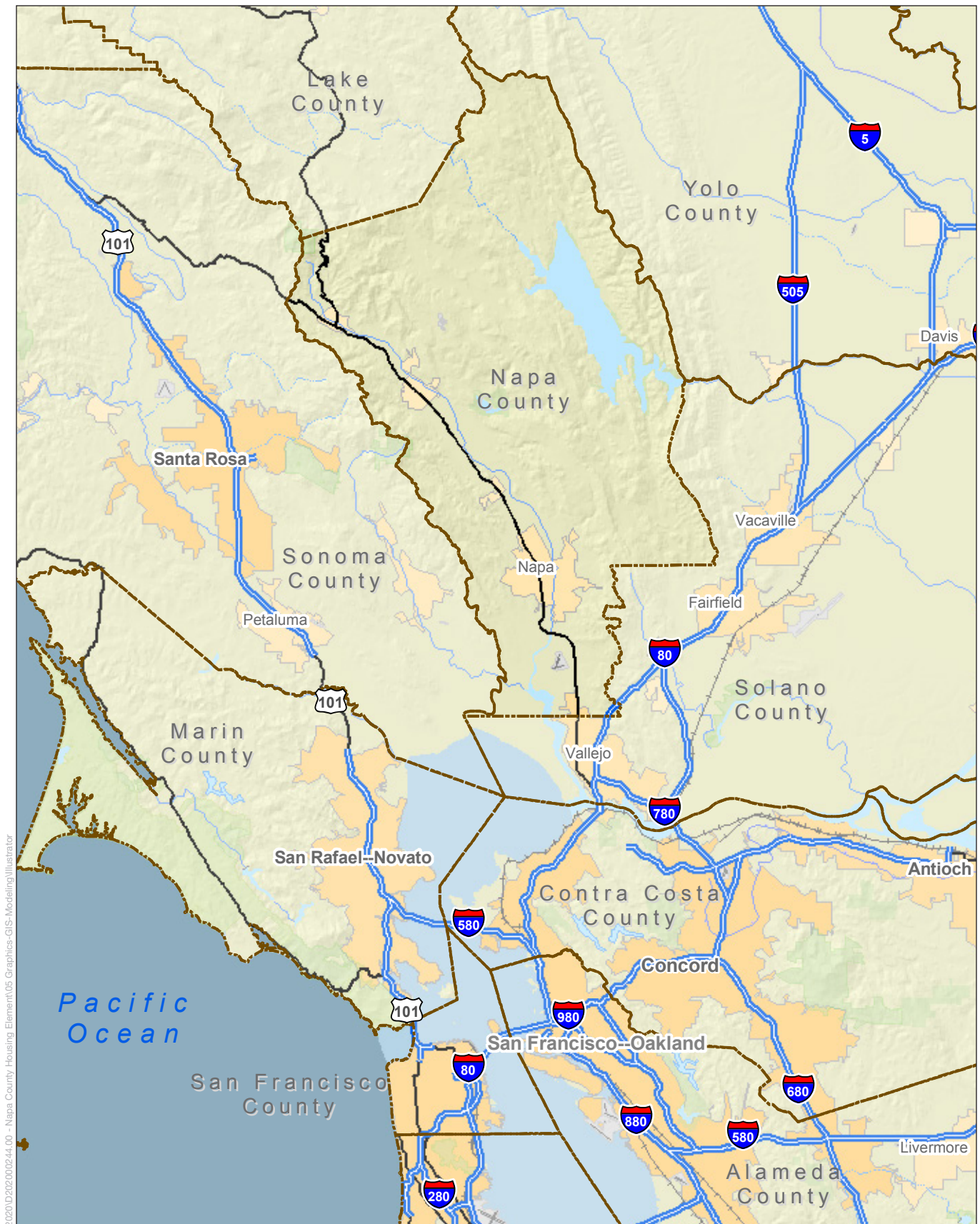
Wednesday, February 16, 2022, at 9:00 a.m.

Napa County Administration Building Third Floor  
Board Chamber  
1195 Third Street  
Napa, CA 94559

This meeting will be conducted via teleconference using the Microsoft Zoom program in order to minimize the spread of the COVID-19 virus, in accordance with the State of Emergency proclaimed by Governor Newsom on March 4, 2020, Executive Order N-29-20 issued by Governor Newsom on March 17, 2020, and the Shelter in Place Order issued by the Napa County Health Officer on March 18, 2020, as may be periodically amended. To participate in the public scoping meeting, the public are invited to observe and address the Commission telephonically or electronically. Instructions for public participation will be included in the agenda for the meeting, which will be available one week prior to the meeting date.

The meeting space is accessible to persons with disabilities. Individuals needing special assistive devices will be accommodated to the County's best ability. Assistive listening devices are available for the hearing impaired from the Clerk of the Board; please call (707) 253-4580 for assistance. If an American Sign Language interpreter or any other special arrangement is required, please provide the Clerk of the Board with 48-hour notice by calling (707) 253-4417.





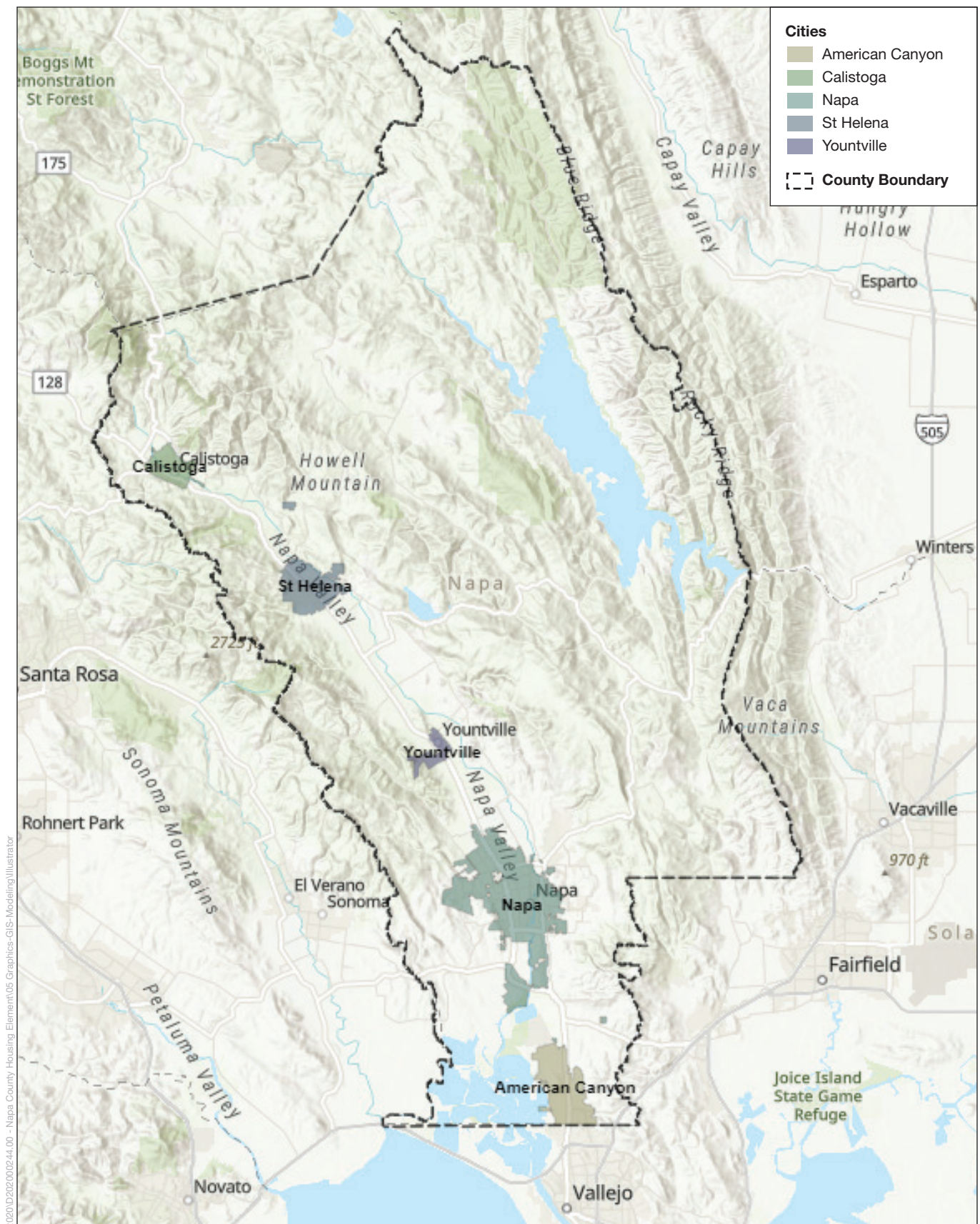
2020\ID202000244.00 - Napa County Housing Element\05 Graphics-GIS-Modeling\Illustrator

SOURCE: Napa County, 2007

Napa County Housing Element Update EIR

## Exhibit 1 Regional Location Map





SOURCE: Napa County, 2021

Napa County Housing Element Update EIR

## Exhibit 2 Project Location Map

Planning Commission Mtg.  
February 16, 2022  
Agenda Item # 8A

**From:** Jake Ruygt <[jruygt@comcast.net](mailto:jruygt@comcast.net)>  
**Sent:** Tuesday, February 15, 2022 9:56 AM  
**To:** PlanningCommissionClerk <[planningcommissionclerk@countyofnapa.org](mailto:planningcommissionclerk@countyofnapa.org)>  
**Subject:** RE: Napa County Planning Commission Meeting Agenda

[External Email - Use Caution]

Dear Planning Commissioners,

I am replying as a representative of the Napa valley Chapter of the California Native Plant Society. My comments are perhaps more in line with a personal concern. The range of topics to be covered by the EIR include biological resources and air quality issues that apply impacts on natural resources. In the face of declining annual rainfall it is imperative that the study also include impacts on overall water use and availability. Continued urban and agricultural growth is placing greater demands on water supplies, wetlands and streams. I include agriculture as part of my comment because they are directly linked in this county.

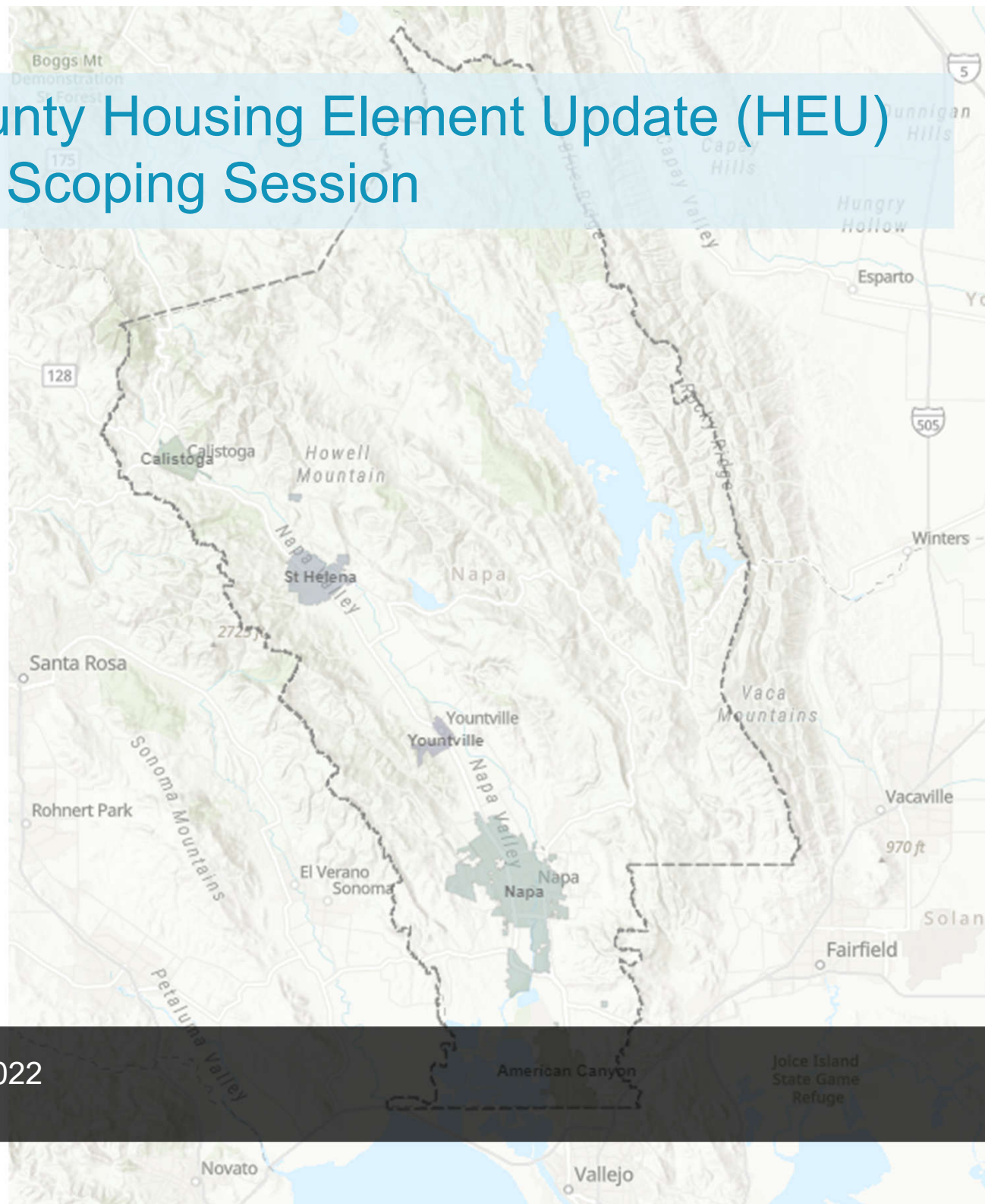
Thank You.

Jake Ruygt  
[jruygt@comcast.net](mailto:jruygt@comcast.net)  
3549 Willis Drive,  
Napa

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**From:** PlanningCommissionClerk [<mailto:planningcommissionclerk@countyofnapa.org>]  
**Sent:** Tuesday, February 08, 2022 4:27 PM  
**Subject:** Napa County Planning Commission Meeting Agenda

# Napa County Housing Element Update (HEU) Draft EIR Scoping Session



February 16, 2022



# OVERVIEW

- CEQA Process
- Purpose of the Scoping Meeting
- Program EIRs
- Environmental Issues
- Environmental Review Process
- EIR Public Participation Opportunities
- Reminder: What is a Scoping Comment
- Public Comments

# CEQA Process: Steps for an EIR





# Purpose of Scoping Meeting

Receive comments from the public and agencies regarding the scope of the environmental document, including:

- Key environmental issues of concern
- Potential mitigation measures
- Potential alternatives for consideration

In short, what should we be looking at in the EIR?

# What is a *Program* EIR?

- A Program EIR is an EIR that considers a series of actions that can be characterized as one large project that are related either:
  - Geographically;
  - Logical parts in a chain of contemplated actions
  - Considers general criteria to govern conduct of a continuing program
  - Activities with similar environmental effects and mitigations
- Preparing a Program EIR allows for consideration of the HEU's impacts more broadly than a project-specific EIR and for identification of program wide mitigation.

# Environmental Issues

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology, Soils, & Paleontology
- Greenhouse Gas Emissions
- Hazards & Hazardous Materials
- Hydrology & Water Quality
- Population & Housing
- Public Services & Recreation
- Utilities & Service Systems
- Transportation
- Tribal Cultural Resources
- Wildfire

# Environmental Review Process

| Milestone                                 | Dates                   |
|---|-------------------------|
| Publish Notice of Preparation (NOP)       | January 24, 2022        |
| Draft EIR scoping session                 | February 16, 2022       |
| End of NOP comment period                 | February 25, 2022       |
| Publish Draft EIR                         | Late-June, 2022         |
| Draft EIR comment session                 | Mid-July, 2022          |
| End of Draft EIR comment period           | August, 2022            |
| Publish Response to Comments on Draft EIR | October, 2022           |
| EIR Certification Hearing                 | November/December, 2022 |

# EIR Public Participation Opportunities

- Speak at today's meeting
- Provide written scoping comments no later than 5:00 p.m. on February 25, 2022 to:

Napa County Planning, Building, and Environmental Services Department  
Attention: Trevor Hawkes  
1195 Third Street, Suite 210  
Napa, CA 94559  
Email: [Trevor.Hawkes@countyofnapa.org](mailto:Trevor.Hawkes@countyofnapa.org)

- Provide comments on the Draft EIR
- Participate in public hearings

# Reminder: What is a Scoping Comment

Looking for comments regarding the scope of the environmental document, including:

- Key environmental issues of concern
- Potential mitigation measures
- Potential alternatives for consideration

# Comments?

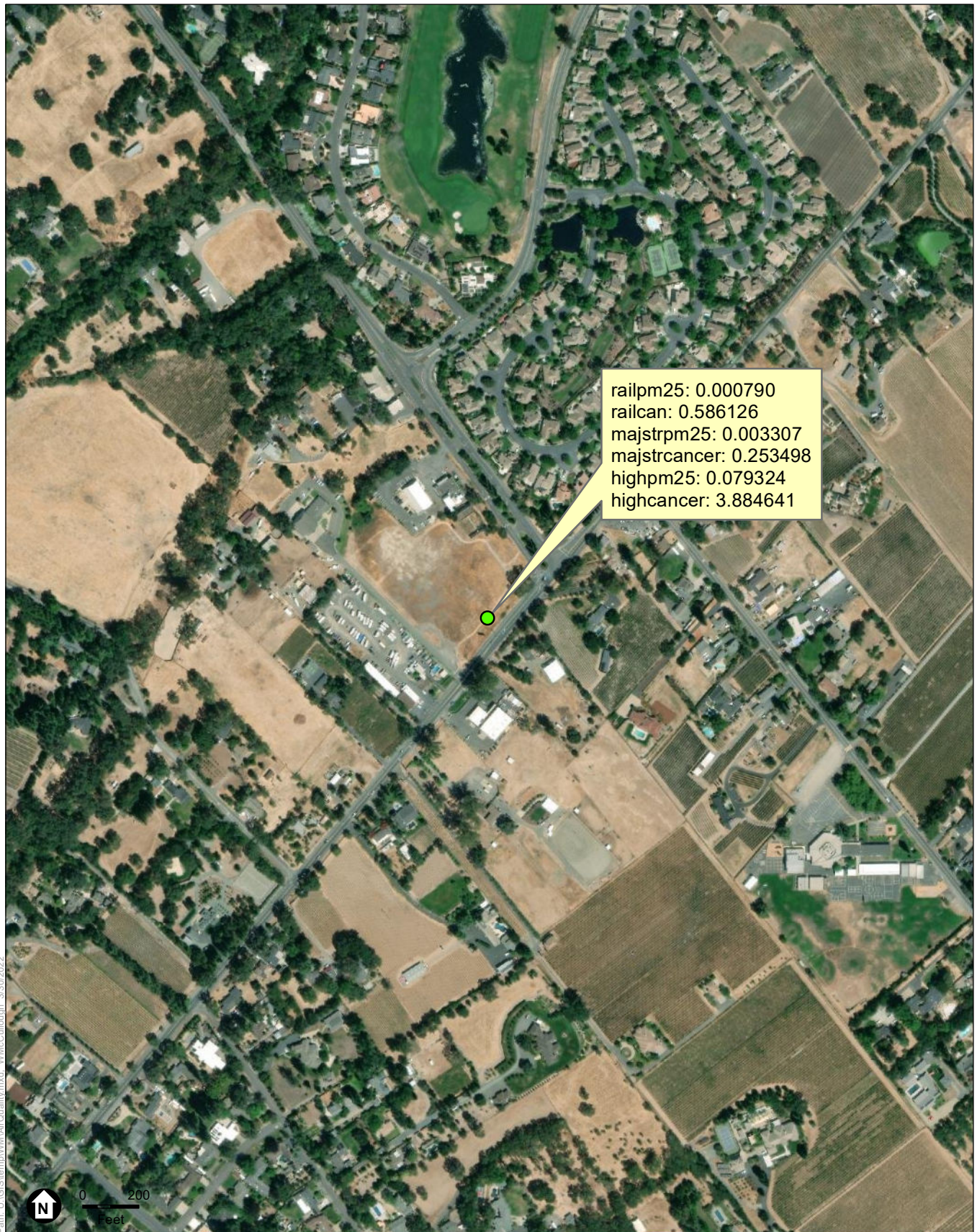




# Appendix B

## **Air Quality Supporting Information**





Napa Housing Element

Figure 1





Napa Housing Element

**Figure 2**

# Appendix C

## **Roadway Noise Calculations**





| SITE                 | UNITS           | ITE LAND USE                                  | TRIPS | LINK  | NOTES                                      | PERCENT                                     | VOLUME |     |  |
|----------------------|-----------------|---|-------|---|--|---|--------|-----|--|
| Spanish Flat         | 100 units       | 215   | 720   | Berryessa-Knoxville Rd                      | (south to Napa)                            | 75%   | 540    |     |  |
|                      |                 | Single-Family (attached)                      |       | Berryessa-Knoxville Rd                      | (north to Lake County)                     | 25%   | 180    |     |  |
|                      |                 | (based on stated density of up to 20 du/acre) |       |   |  |   |        |     |  |
| Northeast Napa       | 183 units total |   |       |   |  |   |        |     |  |
| 1806 Montecello Road | 100 units       | 220   | 674   | Hedgeside Ave                               | (west to McKinley Rd)                      | 35%   | 236    |     |  |
|                      |                 | Multi-Family (Low-Rise)                       |       | McKinley Rd                                 | (from above, north to Estee Ave)           | 35%   | 236    |     |  |
|                      |                 | (based on stated density of 20-25 du/acre)    |       |   | Estee Ave                                  | (from McKinley above, north to Hardman Ave) | 15%    | 101 |  |
|                      |                 | McKinley Rd                                   |       | (from McKinley above, north to golf course) | 20%  | 135   |        |     |  |
|                      |                 | Hedgeside Ave                                 |       | (east to Monticello Rd)                     | 65%  | 438   |        |     |  |
|                      |                 | SR121/Monticello Rd                           |       | (from above, south to Napa)                 | 40%  | 270   |        |     |  |
|                      |                 | SR121/Monticello Rd                           |       | (from above, north to Winters)              | 25%  | 169   |        |     |  |
| 1011 Atlas Peak Road | 58 units        | 220   | 391   | Atlas Peak Rd                               | (north to golf course)                     | 25%   | 98     |     |  |
|                      |                 | Multi-Family (Low-Rise)                       |       | SR121/Monticello Rd                         | (south to Napa)                            | 50%   | 196    |     |  |
|                      |                 | (based on stated density of 20-25 du/acre)    |       |   | SR121/Monticello Rd                        | (north to Winters)                          | 15%    | 59  |  |
|                      |                 | Vichy Ave                                     |       | (south to Hagen Rd)                         | 20%  | 78  |        |     |  |
|                      |                 |   |       |   |  |   |        |     |  |
| 2030 Big Ranch Road  | 25 units        | 220   | 169   | Big Ranch Rd                                | (north to El Centro Ave)                   | 15%   | 25     |     |  |
|                      |                 | Multi-Family (Low-Rise)                       |       | Soscol Ave                                  | (south to Napa)                            | 35%   | 59     |     |  |
|                      |                 | (based on stated density of 20-25 du/acre)    |       |   | Trancas St                                 | (west to SR29)                              | 35%    | 59  |  |
|                      |                 | Trancas St                                    |       | (east to Silverado Trail)                   | 15%  | 25  |        |     |  |
|                      |                 |   |       |   |  |   |        |     |  |
| Imola Avenue         | 100 units       | 215   | 720   | Imola Ave                                   | (west to Soscol Ave)                       | 85%   | 612    |     |  |
|                      |                 | Single-Family (attached)                      |       | 4th Ave                                     | (north to Coombsville Rd)                  | 15%   | 108    |     |  |
|                      |                 | (based on stated density of up to 20 du/acre) |       |   |  |   |        |     |  |
| Foster Road          | 100 units       | 215   | 720   | Foster Rd                                   | (north to Imola Ave)                       | 75%   | 540    |     |  |
|                      |                 | Single-Family (attached)                      |       | Imola Ave                                   | (from above, west to SR29)                 | 50%   | 360    |     |  |
|                      |                 | (based on stated density of up to 20 du/acre) |       |   | Foster Rd                                  | (from Imola above, north to Old Sonoma Rd)  | 25%    | 180 |  |
|                      |                 | Foster Rd                                     |       | (south to Golden Gate Dr)                   | 25%  | 180   |        |     |  |
|                      |                 | Golden Gate Dr / Stanly Ln                    |       |   | (from Foster above, south to Sonoma Hwy)   | 25%   | 180    |     |  |
|                      |                 | Sonoma Hwy                                    |       |   | (from Stanly above, west to Sonoma County) | 15%   | 108    |     |  |
|                      |                 |   |       |   |  |   |        |     |  |

Existing

| Existing                           |          |         |            |                |      |   |    |   |               |        |        |      |                   |    | CALCULATED      | Receptor    | Adjusted   | Distance   | Distance   |      |
|------------------------------------|----------|---------|------------|----------------|------|---|----|---|---------------|--------|--------|------|-------------------|----|-----------------|-------------|------------|------------|------------|------|
| ROAD SEGMENT                       |          |         | TOTAL      | VEHICLE TYPE % |      |   |    |   | VEHICLE SPEED |        |        |      | NOISE LEVEL (dBA) |    |                 | NOISE LEVEL | Dist. from | Noise      | from       | from |
|                                    |          |         | # VEHICLES | Auto           | MT   |   | HT |   | Autc k/h      | MT k/h | HT k/h | Auto | MT                | HT | 15 meters from  | Roadway     | Level      | Roadway to | Roadway to |      |
| Calveno                            |          |         |            |                |      |   |    |   |               |        |        |      |                   |    |                 |             |            | 65 dBA     | 65 dBA     |      |
| Peak                               |          |         |            |                |      |   |    |   |               |        |        |      |                   |    |                 |             |            |            |            |      |
|                                    | from:    | to:     |            | %              | Auto | % | MT | % | HT            |        |        |      |                   |    | roadway center) | Center (m.) | (dBA)      | (m.)       | (ft)       |      |
| SR 121                             | Atlas Pk | Trancas | 800        | 97             | 776  | 2 | 16 | 1 | 8             | 35     | 56     | 35   | 56                | 35 | 56              | 63.2        | 56.1       | 59.8       |            |      |
| SR121                              | Atlas Pk | Vischy  | 900        | 97             | 873  | 2 | 18 | 1 | 9             | 35     | 56     | 35   | 56                | 35 | 56              | 63.7        | 56.6       | 60.3       |            |      |
| Imola                              | Soscal   | Cooms   | 2100       | 97             | 2037 | 2 | 42 | 1 | 21            | 35     | 56     | 35   | 56                | 35 | 56              | 67.4        | 60.3       | 64.0       |            |      |
| Assumptions: Caltrans volumes 2020 |          |         |            |                |      |   |    |   |               |        |        |      |                   |    |                 |             |            |            |            |      |

Assumptions: Caltrans volumes 2020

Existing + Project

| Existing + Project |          |         |                     |                |        |    |       |               |       |     |      |                   |    |    | CALCULATED                                       | Receptor                             | Adjusted                | Distance                             | Distance                             |    |      |      |       |     |
|--------------------|----------|---------|---------------------|----------------|--------|----|-------|---------------|-------|-----|------|-------------------|----|----|--|--------------------------------------|-------------------------|--------------------------------------|--------------------------------------|----|------|------|-------|-----|
| ROAD SEGMENT       |          |         | TOTAL<br># VEHICLES | VEHICLE TYPE % |        |    |       | VEHICLE SPEED |       |     |      | NOISE LEVEL (dBA) |    |    | NOISE LEVEL<br>15 meters from<br>roadway center) | Dist. from<br>Roadway<br>Center (m.) | Noise<br>Level<br>(dBA) | from<br>Roadway to<br>65 dBA<br>(m.) | from<br>Roadway to<br>65 dBA<br>(ft) |    |      |      |       |     |
|                    |          |         |                     | Auto           | MT     | HT | Auto  | MT            | HT    | k/h | Auto | MT                | HT |    |  |                                      |                         |                                      |                                      |    |      |      |       |     |
| Calveno            |          |         |                     |                |        |    |       |               |       |     |      |                   |    |    |  |                                      |                         |                                      |                                      |    |      |      |       |     |
| Peak               | from:    |         |                     | %              | Auto   | %  | MT    | %             | HT    |     |      |                   |    |    |  |                                      |                         |                                      |                                      |    |      |      |       |     |
| SR 121             | Atlas Pk | Trancas | 847                 | 97             | 821.11 | 2  | 16.93 | 1             | 8.465 | 35  | 56   | 35                | 56 | 35 | 56   | 63.5                                 | 56.3                    | 60.0                                 | 65.6                                 | 40 | 61.4 | 17.3 | 56.8  | 0.2 |
| SR121              | Atlas Pk | Vischy  | 923                 | 97             | 895.03 | 2  | 18.45 | 1             | 9.227 | 35  | 56   | 35                | 56 | 35 | 56   | 63.8                                 | 56.7                    | 60.4                                 | 66.0                                 | 40 | 61.7 | 18.9 | 61.9  | 0.1 |
| Imola              | Soscal   | Cooms   | 2197                | 97             | 2131.3 | 2  | 43.94 | 1             | 21.97 | 35  | 56   | 35                | 56 | 35 | 56   | 67.6                                 | 60.5                    | 64.2                                 | 69.8                                 | 40 | 65.5 | 44.9 | 147.4 | 0.2 |

Assumptions: Caltrans volumes 2020 + Project volumes from Fehr & Peers

# Appendix D

## **Vehicle Miles Traveled Analysis**



# Memorandum

Date: August 9, 2022

To: Hillary Gitelman, Mary Laux, and Jillian Feyk-Miney, Environmental Science Associates.  
Trevor Hawkes, County of Napa

From: Ian Barnes, Terence Zhao, and Grace Chen, Fehr & Peers

**Subject: County of Napa Housing Element Update – CEQA VMT Analysis**

WC21-3826

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## Introduction and Background

Fehr & Peers has completed a CEQA VMT analysis of the County of Napa Housing Element Update project (the Project), which identified sites suitable for development of multifamily housing. These sites are grouped in four distinct geographies: Spanish Flat, Northeast Napa, Imola Avenue, and Foster Road. The number and location of sites are subject to adjustment based on further community input and analysis.

The development allows for additional housing units to be developed beyond those currently envisioned as part of the County's adopted General Plan; accordingly, the effects of these additional housing units on the transportation system are required to be analyzed at a programmatic level. The assessment is comprised of:

- Estimation of Countywide Project-Generated VMT
- Estimation of Boundary VMT by Speed Bin
- Residential vehicle-miles traveled (VMT) per resident for Housing Element update sites

The remainder of this memorandum outlines the assumptions, methods and outcomes of the analyses described.

## CEQA Vehicle-Miles Traveled Analysis

Senate Bill 743 (Steinberg, 2013) instructed the State Office of Planning and Research (OPR) to update the CEQA Guidelines to remove congestion-based analysis (such as Level of Service analysis) from CEQA Transportation analysis, and to install a new metric (vehicle-miles traveled, or VMT). The intent of SB 743 was to encourage infill development, promote healthier communities through active transportation (e.g. walking and bicycling), and align CEQA Transportation analysis to aid California in meeting greenhouse gas reduction targets set by other pieces of legislation (i.e. AB 32). Ultimately, SB 743 has shifted CEQA transportation analysis from measuring the effects on a project on drivers, to measuring the environmental effects of driving generated by a project. Adopted in December 2018, Section 15064.3 of the CEQA Guidelines notes that vehicle-miles traveled (VMT) is the most appropriate metric for the analysis of impacts in the Transportation section of CEQA analysis.

VMT measures the amount of driving that a project generates. For example, a project generating 100 total (inbound and outbound) vehicle trips per day that travel an average of 5.0 miles per trip results in 500 project-generated VMT per day. VMT has historically been used in CEQA as an input for the Air Quality and Greenhouse Gas sections, but VMT can also show how efficient the connection between the transportation system and existing or proposed land uses is. For the purposes of analyzing the CEQA Transportation impacts of residential projects, the VMT generated by the project is converted to an efficiency metric by dividing the amount of VMT generated by the number of residents; efficiency metrics are used in CEQA Transportation VMT analysis because the goal of the analysis is to show whether or not a particular development will generate low enough VMT to aid the State in meeting its climate targets relative to projected growth in population, employment, etc.

For this Project, data from the Solano Napa Activity-Based Model (SNABM) was used to develop daily VMT forecasts; the model has a Base Year of 2015 and Horizon Year of 2040. VMT was calculated from the SNABM output for Base Year (2015), Base Year plus Project, Cumulative (2040) and Cumulative plus Project Conditions; the Base Year (2015) model was used to assess CEQA baseline conditions due to the effects of major wildfires in 2017-2020 and the COVID-19 pandemic. Full model inputs and outputs was provided to Fehr & Peers by Solano Transportation Authority (STA) in May 2021 and reflect the latest model updates (prepared in August 2020) to incorporate land use and transportation network assumptions consistent with MTC's Plan Bay Area 2040, the regional transportation plan (2017 RTP) at the time of model development.

To understand the VMT forecasts and VMT impact analysis, the following metrics were developed:

- **Countywide Project-Generated VMT:** The sum of the VMT associated with travel from, to, and within the proposed HEU sites. This information is used for the Transportation section of CEQA.

- **Project's Effect on VMT (Boundary VMT) by Speed Bin:** An evaluation of the change in total vehicle travel within Napa County, compared between the no project and with project conditions. Boundary VMT are further stratified by speed bin, which is needed to evaluate emissions for CEQA Air Quality and CEQA Greenhouse Gas (GHG) analyses. The VMT is allocated to each five mile per hour speed bin from 0 to 80 mph.

Project-generated VMT is the metric used to evaluate how the project VMT changes (increases or decreases) between the without Project and with Project scenarios, considering both VMT increases due to growth and VMT reductions due to changes in travel behavior; however, it does not evaluate a Project's effect on VMT across an entire roadway system.<sup>1</sup> The Project's effect on VMT compares the changes in boundary between the Existing Conditions and Existing with Project Conditions and presents VMT for all trip purposes and vehicle types (i.e., there is no separation of VMT by land use).

In addition, based on guidance provided by the State Office of Planning and Research (OPR) in its *Technical Advisory on Evaluating Transportation Impacts in CEQA* (December 2018), **residential VMT per resident** for each housing development site was estimated based on its location in the County as represented in SNABM. Specifically, for each traffic analysis zone (TAZ) in the model that contains a housing site, its value for residential VMT per resident was used as a proxy for an estimate of that value of the new housing developments at these sites, as it is expected that the VMT characteristics of new residents at the developments will be similar to those of the existing residents at the respective locations. Each TAZ's residential VMT per resident is compared against significance thresholds to determine whether the housing site might have significant impact. As these housing sites have diverse land use and travel characteristics resulting in significantly different VMT characteristics, they are compared against thresholds individually.

Two significance thresholds were considered for use in the analysis. First, based on OPR's guidance, the analysis considered finding a significant impact if project-related VMT would be less than 15 percent below regional baseline (nine-county Bay Area) total residential VMT per resident<sup>2</sup>.

However, in 2022, the County of Napa adopted its Traffic Impact Study (TIS) Guidelines, which defines a different threshold of significance for VMT, as follows:

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<sup>1</sup> An often-cited example of how a project can affect VMT is the addition of a grocery store in a food desert. Residents of a neighborhood without a grocery store have to travel a great distance to an existing grocery store. Adding a grocery store to that neighborhood will shorten many of the grocery shopping trips and reduce the total amount of VMT to/from the neighborhood.

<sup>2</sup> The *Technical Advisory* notes that for land use projects or programs located in the unincorporated areas of a county that is included in an MPO region, the threshold should be based on (1) the region (i.e. MPO) VMT per capita or (2) the aggregate population-weighted VMT per capita of all incorporated cities and towns in the region (i.e. MPO).



*"A project's significant VMT impacts [is] based on a threshold of a 15% reduction compared to the unmitigated VMT estimated for the proposed project. This threshold applies the numerical reduction of 15% that the OPR Technical Advisory recommends as being consistent with the level of VMT reduction needed to achieve state climate goals, and applies that percent reduction to a baseline that is meaningful in the context of Napa County."*

This assessment will assume the thresholds contained within the County TIS guidelines to be authoritative. However, results of analysis against the OPR-provided threshold will also be presented for reference.

### Population Summary

Existing and planned land use development is represented in SNABM at the TAZ level. Project site TAZs, Napa County, Unincorporated Napa County, and Nine-County Bay Area population summaries were calculated for the base year and cumulative year scenarios. The SNABM has base year (2015) and cumulative year (2040) scenarios. **Table 1** presents the population summaries based on SNABM land use data.

**Table 1: Population Summaries**

| Geographic Area |   | Base Year (2015)<br>Population | Cumulative Year<br>(2040) Population |
|-----------------|---|--------------------------------|--------------------------------------|
| TAZ 75          | Foster Road   | 874                            | 1,008                                |
| TAZ 145         | Imola Avenue  | 136                            | 155                                  |
| TAZ 154         | Northeast Napa ( <i>Monticello and Atlas Peak sites</i> ) | 3,125                          | 3,407                                |
| TAZ 197         | Spanish Flat  | 281                            | 341                                  |

Source: SNABM, Fehr & Peers, February 2022.

### Trip Generation

The Project is expected to add 760 units in total, of which 458 are at the identified sites, and the remainder are additional single-family homes and accessory dwelling units (ADUs) at unspecified locations. The 458 units that constitute discrete, site-based projects are analyzed here. Project trip generation was calculated using the 11<sup>th</sup> Edition of the Trip Generation Manual produced by the Institute of Transportation Engineers (ITE) for each of the housing inventory sites, matching land use categories to the stated target densities for each site. **Table 2** presents the number of trips generated by each project site.

**Table 2: Trip Generation Per Project Site**

| Site                  | Units | Land Use                              | ITE Land Use Code | Daily Trips |
|-----------------------|-------|---------------------------------------|-------------------|-------------|
| Foster Road           | 100   | Single-Family (Attached) <sup>1</sup> | 215               | 720         |
| Imola Avenue          | 100   | Single-Family (Attached) <sup>1</sup> | 215               | 720         |
| <i>Northeast Napa</i> |       |                                       |                   |             |
| 1806 Monticello Road  | 100   | Multi-Family (Low-Rise) <sup>2</sup>  | 220               | 674         |
| 1011 Atlas Peak Road  | 58    | Multi-Family (Low-Rise) <sup>2</sup>  | 220               | 391         |
| Spanish Flat          | 100   | Single-Family (Attached) <sup>1</sup> | 215               | 720         |

Notes: 1. Based on stated density of up to 20 dwelling unit/acre. 2. based on stated density of 20-25 dwelling unit/acre.  
Source: Institute of Transportation Engineers (ITE), Trip Generation, 11th Edition, 2021.

## Population Change

Household size data found within SNABM was used to estimate the total population change resulting from the construction of these units. Specifically, the household size assigned to each TAZ that contains a housing development site is used as an estimate of the future average size of households inhabiting the new developments, which then yields the number of residents that will inhabit the developments given the number of planned units. This household size data is used as a proxy for that of the new housing developments at these sites as it is expected that the household characteristics of new residents at the developments will be similar to those of the existing residents at the respective locations. As shown in **Table 3**, the planned units are expected to create a population increase of 1,204 in the base year (2015), and 1,236 in the cumulative year (2040).

**Table 3: Estimated Population Increase from Project**

| TAZ     | Site Area   | Units | Base Year (2015) |                     | Cumulative Year (2040) |                     |
|---------|---|-------|------------------|---------------------|------------------------|---------------------|
|         |   |       | Household Size   | Population increase | Household Size         | Population increase |
| TAZ 75  | Foster Road   | 100   | 2.5              | 249                 | 2.6                    | 256                 |
| TAZ 145 | Imola Avenue  | 100   | 3.3              | 329                 | 3.4                    | 337                 |
| TAZ 154 | Northeast Napa<br>(Monticello and Atlas Peak sites) | 158   | 2.4              | 376                 | 2.4                    | 386                 |
| TAZ 197 | Spanish Flat  | 100   | 2.5              | 250                 | 2.6                    | 257                 |
| Total   |   | 458   | -                | 1,204               | -                      | 1,236               |

Source: SNABM, Fehr & Peers, February 2022.

## Countywide Project Generated Total VMT

VMT associated with households, interregional trips, trucks, and air passengers of each TAZ within Napa County are summed to obtain countywide project generated total VMT for both base and cumulative year no-Project scenario. Based on the results from trip generation presented above and assuming a 12-mile average trip length according to the results California Household Travel Survey (2010-2012) for unincorporated Napa County, the project VMT is calculated and added on top of no-project VMT to estimate the base and cumulative year project-generated total VMT. The results of countywide project generated total VMT for each scenario is presented in **Table 4**.

**Table 4: Countywide Project Generated Total VMT**

|                               | No Project | With Project | Net Change |
|-------------------------------|------------|--------------|------------|
| <b>Base Year (2015)</b>       | 7,001,399  | 7,040,099    | +38,700    |
| <b>Cumulative Year (2040)</b> | 8,476,178  | 8,514,878    | +38,700    |

Source: SNABM, Fehr & Peers, February 2022.

## Napa County Boundary VMT by Speed Bin

As mentioned earlier, boundary VMT evaluates the change in total vehicle travel within Napa County. Boundary VMT are further stratified by speed bin for air quality and greenhouse gas analyses. VMT by speed bin as well as total boundary VMT within Napa County was calculated for both the base year and cumulative year no-Project scenarios. Based on the trip generation estimated, assuming a 12-mile average trip length, the project VMT is pro-rated between the 0 to 45 mph speed bins to estimate the base and cumulative year with-project boundary VMT by speed bin. The results of countywide boundary VMT by speed bin for each scenario is presented in **Table 5**.

**Table 5: Napa County Boundary VMT by Speed Bin**

| Speed Bin         | Base Year (2015) |       |              |       | Cumulative Year (2040) |       |              |       |
|-------------------|------------------|-------|--------------|-------|------------------------|-------|--------------|-------|
|                   | No Project       |       | With Project |       | No Project             |       | With Project |       |
|                   | VMT              | %     | VMT          | %     | VMT                    | %     | VMT          | %     |
| <b>0 - 4.99</b>   | 102              | 0.0%  | 104          | 0.0%  | 1,272                  | 0.0%  | 1,294        | 0.0%  |
| <b>5 - 9.99</b>   | 188              | 0.0%  | 192          | 0.0%  | 9,906                  | 0.2%  | 10,078       | 0.2%  |
| <b>10 - 14.99</b> | 0                | 0.0%  | 0            | 0.0%  | 54,921                 | 1.2%  | 55,870       | 1.2%  |
| <b>15 - 19.99</b> | 40,270           | 1.2%  | 41,226       | 1.2%  | 3,991                  | 0.1%  | 4,060        | 0.1%  |
| <b>20 - 24.99</b> | 418,435          | 12.6% | 428,368      | 12.7% | 553,697                | 12.4% | 563,268      | 12.5% |
| <b>25 - 29.99</b> | 444,773          | 13.3% | 455,331      | 13.5% | 547,909                | 12.3% | 557,380      | 12.4% |
| <b>30 - 34.99</b> | 329,537          | 9.9%  | 337,360      | 10.0% | 400,750                | 9.0%  | 407,678      | 9.1%  |
| <b>35 - 39.99</b> | 250,184          | 7.5%  | 256,123      | 7.6%  | 356,443                | 8.0%  | 362,604      | 8.1%  |
| <b>40 - 44.99</b> | 146,753          | 4.4%  | 150,236      | 4.5%  | 310,006                | 6.9%  | 315,365      | 7.0%  |
| <b>45 - 49.99</b> | 663,369          | 19.9% | 663,369      | 19.7% | 961,939                | 21.6% | 961,939      | 21.4% |
| <b>50 - 54.99</b> | 571,821          | 17.2% | 571,821      | 17.0% | 644,484                | 14.4% | 644,484      | 14.3% |

| Speed Bin                         | Base Year (2015) |             |                  |             | Cumulative Year (2040) |             |                  |             |
|-----------------------------------|------------------|-------------|------------------|-------------|------------------------|-------------|------------------|-------------|
|                                   | No Project       |             | With Project     |             | No Project             |             | With Project     |             |
|                                   | VMT              | %           | VMT              | %           | VMT                    | %           | VMT              | %           |
| 55 - 59.99                        | 157,557          | 4.7%        | 157,557          | 4.7%        | 201,311                | 4.5%        | 201,311          | 4.5%        |
| 60 - 64.99                        | 308,689          | 9.3%        | 308,689          | 9.2%        | 417,059                | 9.3%        | 417,059          | 9.3%        |
| 65 - 69.99                        | 2,273            | 0.1%        | 2,273            | 0.1%        | 0                      | 0.0%        | 0                | 0.0%        |
| 70 - 74.99                        | 0                | 0.0%        | 0                | 0.0%        | 0                      | 0.0%        | 0                | 0.0%        |
| 75 - 79.99                        | 0                | 0.0%        | 0                | 0.0%        | 0                      | 0.0%        | 0                | 0.0%        |
| <b>Total<br/>Boundary<br/>VMT</b> | <b>3,333,950</b> | <b>100%</b> | <b>3,372,650</b> | <b>100%</b> | <b>4,463,688</b>       | <b>100%</b> | <b>4,502,388</b> | <b>100%</b> |

Source: SNABM, Fehr & Peers, February 2022.

### Residential VMT Per Resident

**Table 6** presents base and cumulative year residential VMT per resident for each TAZ where the housing inventory site locates in; these values range from 20.0 to 61.6 for the base year, and 19.0 to 64.8 for the cumulative year depending on the housing site. These are the unmitigated VMT values to use for the TIS-defined threshold. Mitigation measures will be discussed in the following section.

The table also presents analysis against the OPR-defined threshold for reference. Based on data from SNABM, in the base year (2015), the nine-county Bay Area average total residential VMT per resident is 16.9, and a threshold of 15 percent below this value is 14.3. In the cumulative year (2040), the nine-county Bay Area average total residential VMT per resident is 16.0, and a threshold of 15 percent below this value is 13.6. Project site TAZs have residential VMT per resident above the Nine-County Bay Area average. **Figures 1** and **2** present the residential VMT per resident by TAZ as compared against Nine-County Bay Area Average.

**Table 6: Residential VMT per Resident by Site**

| Project Site   | Parcel(s)       | TAZ             | Base Year (2015)                          |                                    | Cumulative Year (2040)       |                                    |
|----------------|-----------------|-----------------|---|------------------------------------|------------------------------|------------------------------------|
|                |                 |                 | Residential VMT per Resident <sup>1</sup> | % Difference from Bay Area Average | Residential VMT per Resident | % Difference from Bay Area Average |
| Foster Road    | APN 043-062-008 | 75 <sup>2</sup> | 20.3                                      | 20%                                | 19.0                         | 18%                                |
| Imola Avenue   | APN 046-450-041 | 145             | 20.0                                      | 19%                                | 21.4                         | 34%                                |
| Northeast Napa | APN 039-320-005 | 154             | 37.6                                      | 123%                               | 39.1                         | 144%                               |
|                | APN 049-110-005 |                 |   |                                    |                              |                                    |
|                | APN 039-320-016 |                 |   |                                    |                              |                                    |

| Project Site                          | Parcel(s)       | TAZ | Base Year (2015)                          |                                    | Cumulative Year (2040)       |                                    |
|---------------------------------------|-----------------|-----|---|------------------------------------|------------------------------|------------------------------------|
|                                       |                 |     | Residential VMT per Resident <sup>1</sup> | % Difference from Bay Area Average | Residential VMT per Resident | % Difference from Bay Area Average |
| Spanish Flat                          | APN 019-261-041 | 197 | 61.6                                      | 265%                               | 64.8                         | 305%                               |
| <b>Nine-County Bay Area Average</b>   |                 |     | <b>16.9</b>                               | -                                  | <b>16.0</b>                  | -                                  |
| <b>Thresholds</b>                     |                 |     |   |                                    |                              |                                    |
| 15% Below Bay Area Average            |                 |     | < 14.3                                    | < -15%                             | < 13.6                       | < -15%                             |
| Between 15%-0% Below Bay Area Average |                 |     | 14.3 ~ 16.9                               | -15%~0%                            | 13.6 ~ 16                    | -15%~0%                            |
| Above Bay Area Average                |                 |     | > 16.9                                    | > 0%                               | > 16                         | > 0%                               |

Notes: 1. Residential VMT per resident is defined as total non-commercial VMT per resident. 2. For the Foster Road site, the majority of the site parcels are on TAZ 76. However, TAZ 76 has less than 50 population, which would be rounded down to 0 for VMT metrics calculation, making it not a suitable source of data. TAZ 75 is immediately adjacent to TAZ 76 and has the land use that is similar to the planned development, and so is used instead.

Source: SNABM, Fehr & Peers, February 2022.

## Mitigation Measures

Based on the County TIS guidelines, mitigation measures, if feasible, would need to reduce program TAZ VMT per resident by 15%, or 3.0 to 9.2 VMT per resident depending on project site based on Base Year values of 20.0 to 61.6 VMT per resident.

Transportation Demand Management (TDM) strategies work best when they are applied at a city or regional scale and when the travel characteristics of the users or tenants of a site are known. The proposed program aims to develop some five sites in four geographies around the County of varying transportation characteristics, and the timeline for construction of the housing units envisioned as part of this program is unknown. Because of the geographic spread of the Potential Sites, and uncertainty regarding the buildout of the Potential Sites, the County should consider implementing a TDM ordinance or other TDM-related policies as part of the next General Plan update.

Additionally, the effectiveness of TDM measures for land use projects in unincorporated areas of Napa County is difficult to quantify as the literature documenting the effectiveness of land use project-level TDM strategies are generally related to suburban and urban areas, not unincorporated areas. Current studies<sup>3</sup> show the maximum percentages of VMT reduction that can be achieved in suburban contexts in California calculates out to the range of mid-single digits due to factors associated with the land use, such as low transit usage. The requirement to reduce daily VMT and vehicle trips by 15 percent thus exceeds the range of what would be achievable in

<sup>3</sup> *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity*, California Air Pollution Control Officers Association, December 2021.

trip reduction for communities similar to the ones in Napa County that would host the new developments. However, while the level of VMT reduction associated with TDM measures are unlikely to mitigate the program's impact to a less-than-significant level, CEQA requires that feasible mitigation measures be implemented to reduce a project or program's level of impact.

**Mitigation Measure 1: TDM Program.** Prior to issuance of building permits, project applicants shall develop a TDM program for the proposed project, including any anticipated phasing, and shall submit the TDM Program to the County for review and approval. The TDM Program shall identify trip reduction strategies as well as mechanisms for funding and overseeing the delivery of trip reduction programs and strategies. The TDM Program shall be designed to attempt to achieve the following trip reduction, as required to meet thresholds identified by the County TIS Guidelines. The mitigation measure should include all feasible mitigation measures. The County would need to decide what measures are infeasible to exclude them for any or all sites.

- A 15% reduction compared to the unmitigated VMT estimated for the proposed project

Trip reduction strategies may include, but are not limited to, the following:

1. Provision of bus stop improvements or on-site mobility hubs
2. Pedestrian improvements, on-site or off-site, to connect to nearby transit stops, services, schools, shops, etc.
3. Bicycle programs including bike purchase incentives, storage, maintenance programs, and on-site education program
4. Enhancements to countywide bicycle network
5. Parking reductions and/or fees set at levels sufficient to incentivize transit, active transportation, or shared modes
6. Cash allowances, passes, or other public transit subsidies and purchase incentives
7. Providing enhanced, frequent bus service
8. Implementation of shuttle service
9. Establishment of carpool, buspool, or vanpool programs
10. Vanpool purchase incentives
11. Low emission vehicle purchase incentives/subsidies
12. Compliance with a future County VMT/TDM ordinance
13. Participation in a future County VMT fee program
14. Participate in future VMT exchange or mitigation bank programs

As the above TDM strategies are heavily dependent on context, a matrix detailing which TDM strategies may be most effective when taking in account local contexts (by Potential Site group) has been included as **Table 7**.

**Table 7: Potential Effectiveness of TDM Strategies by Potential Site Group**

| TDM Strategy  | FR | IA | NE | SF |
|---|----|----|----|----|
| 1. Provision of bus stop improvements or on-site mobility hubs  | L  | L  | L  | L  |
| 2. Pedestrian improvements, on-site or off-site, to connect to nearby transit stops, services, schools, shops, etc.       | M  | M  | M  | L  |
| 3. Bicycle programs including bike purchase incentives, storage, maintenance programs, and on-site education program      | M  | M  | M  | L  |
| 4. Enhancements to countywide bicycle network   | M  | M  | M  | L  |
| 5. Parking reductions and/or fees set at levels sufficient to incentivize transit, active transportation, or shared modes | H  | H  | H  | L  |
| 6. Cash allowances, passes, or other public transit subsidies and purchase incentives                                     | M  | M  | M  | L  |
| 7. Providing enhanced, frequent bus service   | M  | M  | M  | L  |
| 8. Implementation of shuttle service  | M  | M  | M  | L  |
| 9. Establishment of carpool, buspool, or vanpool programs   | M  | M  | M  | L  |
| 10. Vanpool purchase incentives   | L  | L  | L  | L  |
| 11. Low emission vehicle purchase incentives/subsidies  | H  | H  | H  | H  |
| 12. Compliance with a future County VMT/TDM ordinance   | H  | H  | H  | H  |
| 13. Participation in a future County VMT fee program  | H  | H  | H  | H  |
| 14. Participate in future VMT exchange or mitigation bank programs  | H  | H  | H  | H  |

Notes:

Sites: FR = Foster Road, IA = Imola Avenue, NE = Northeast Napa, SF = Spanish Flat

Potential effectiveness ratings: L = low, M = medium, H = high

Potential effectiveness of strategies based on Potential Site Group density, access to transit, and nearby destinations within walking or bicycling distance

Source: Fehr & Peers, April 2022.

The VMT forecasts presented in this assessment do not take into consideration some foreseeable travel changes, including increased use of transportation network companies, such as Uber and Lyft, nor the potential for autonomous vehicles. Although the technology for autonomous vehicles is expected to be available over the planning horizon, the federal and State legal and policy frameworks are uncertain. Initial modeling of an autonomous future indicates that with automated and connected vehicles, the capacity of the existing transportation system would increase as vehicles can travel closer together; however, these efficiencies are only realized when a high percentage of vehicles on the roadway are automated and connected. There is also the potential for vehicle travel to increase with zero-occupancy vehicles on the roadway. Additionally,

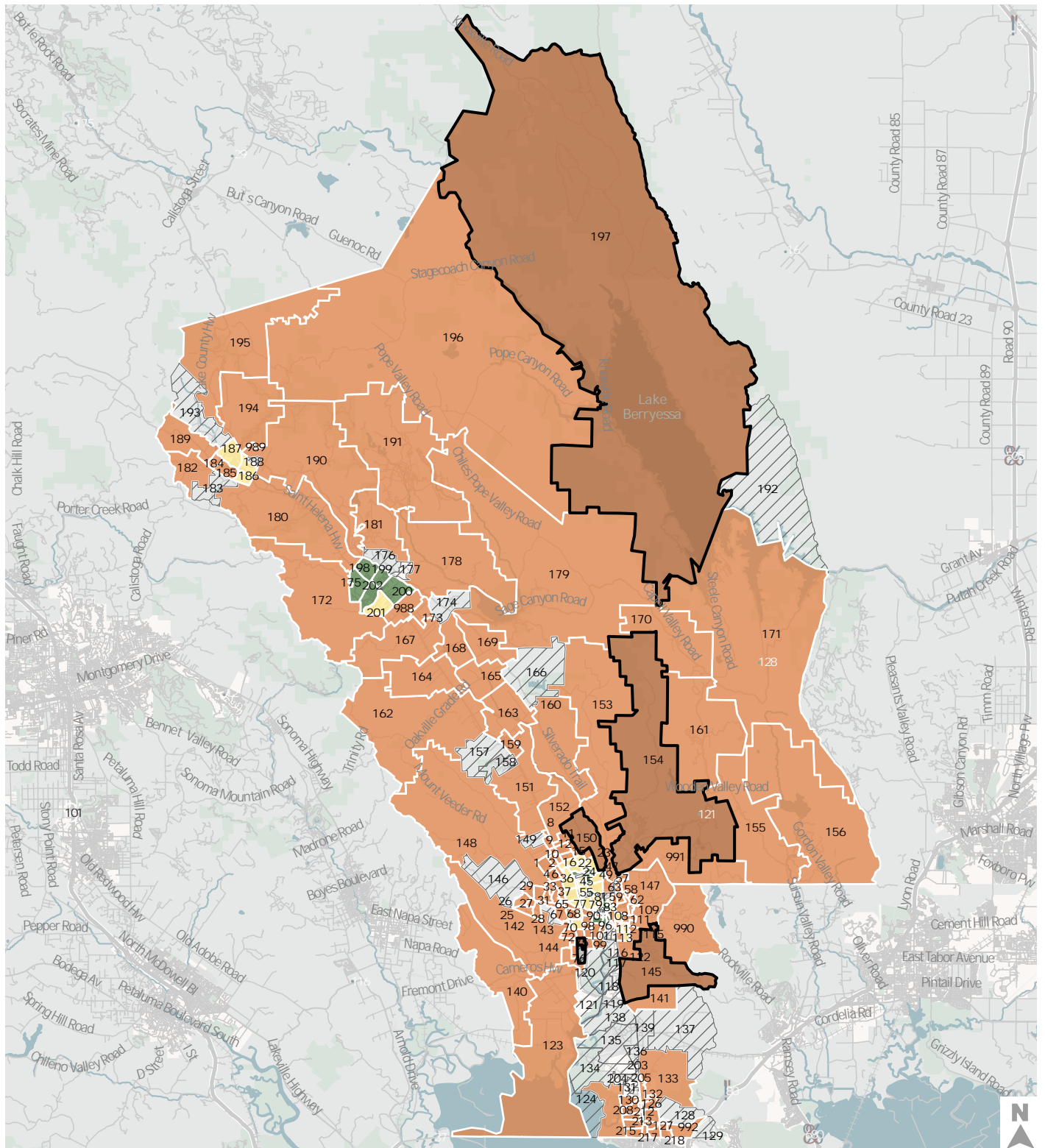


the VMT forecasts are based on a model that was developed using data reflecting travel conditions before COVID-19; the effects of COVID-19 may be a near-term suppression in travel activity on the basis of reduced economic output and permanently modified travel habits.

However, a TDM program would likely not result in the 15 percent VMT reductions required, nor would they result in reducing VMT to more than 15% below regional values, and thus the impact is **significant and unavoidable**.

## Attachments

- Figure 1      2015 Residential VMT Per Resident, Compared to Bay Area Average, SNABM  
Figure 2      2040 Residential VMT Per Resident, Compared to Bay Area Average, SNABM

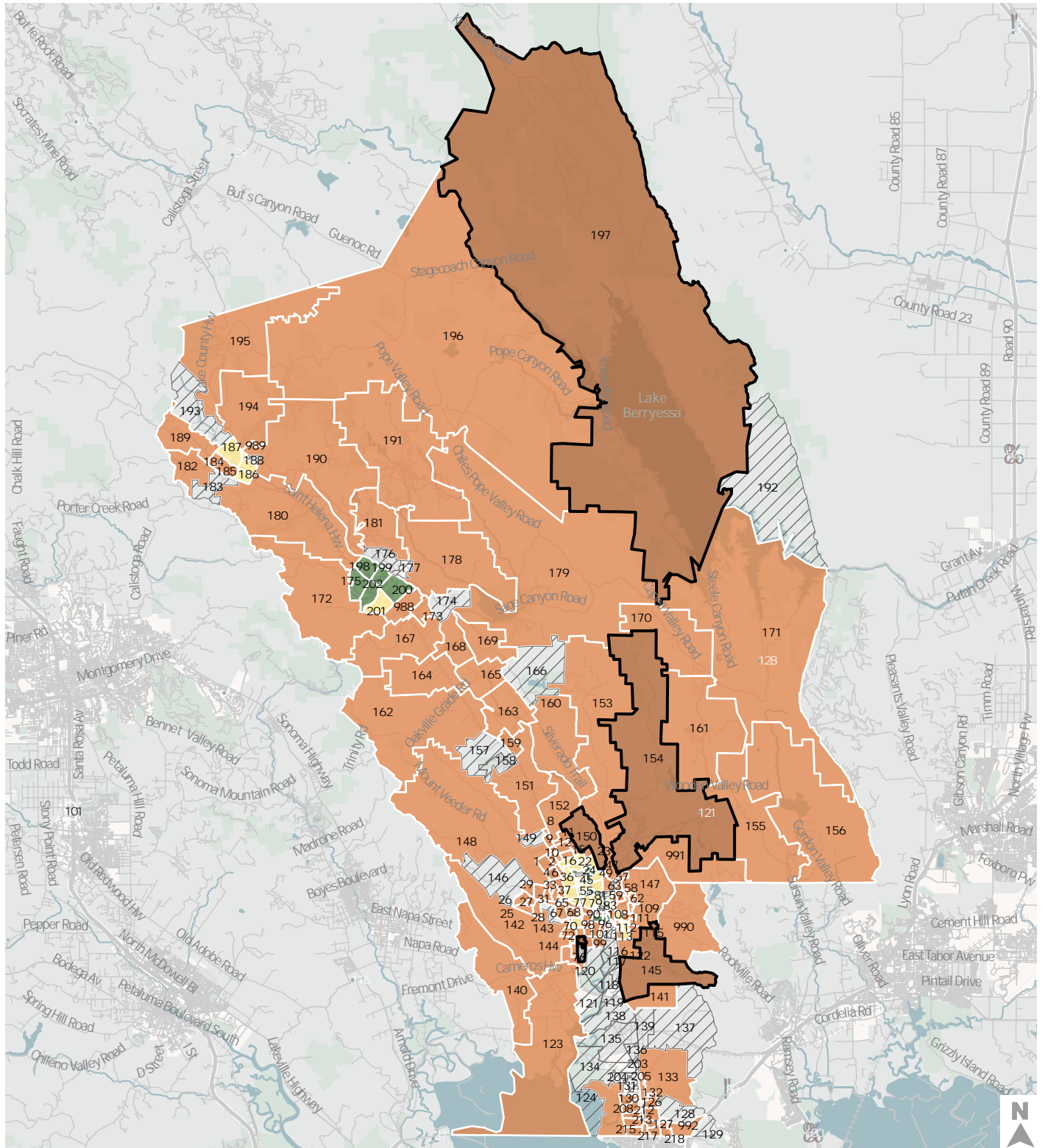


Source: Solano-Napa Activity Based Model, Solano Transportation Authority and TJKM (2021)

- 15% below Bay Area average
- Between 15%-0% below Bay Area average
- Above Bay Area average
- TAZ with very low population
- ### TAZ ID
- Site TAZs

Figure 1

2015 Residential VMT Per Resident  
Compared to Nine-County Bay Area Average  
SNABM Model



Source: Solano-Napa Activity Based Model, Solano Transportation Authority and TJKM (2021)

- 15% below Bay Area average
- Between 15%-0% below Bay Area average
- Above Bay Area average
- TAZ with very low population
- TAZ ID
- Site TAZs

Figure 2

2040 Residential VMT Per Resident  
Compared to Nine-County Bay Area Average  
SNABM Model

# Appendix E

## **AB 747 Emergency Evacuation Assessment**



# Draft Memorandum

Date: April 15, 2022

To: Hillary Gitelman, Mary Laux, and Jillian Feyk-Miney, Environmental Science Associates  
Trevor Hawkes, County of Napa

From: Ian Barnes, Terence Zhao, and Grace Chen, Fehr & Peers

**Subject: County of Napa AB 747 Emergency Evacuation Assessment**

WC21-3826

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Fehr & Peers has completed a general, programmatic assessment of emergency evacuation routes for the County of Napa. This assessment is consistent with Assembly Bill 747 (AB 747) and Senate Bill 99 (SB 99) requirements.

This document is intended to provide an assessment of roadway capacity under the described scenarios and should not be considered an evacuation plan. Please note that emergency evacuation can occur due to any number of events. Additionally, wildfire movement in particular is unpredictable as is individual behavior related to evacuation events. As such, this assessment is intended to provide the County with a broad “planning level” assessment of the capacity of the transportation system during an evacuation scenario; it does not provide guarantees as to the adequacy of the system nor can it guarantee that the findings are applicable to any or all situations.

Moreover, as emergency evacuation assessment is an emerging field, there is no established standard methodology. We have adopted existing methodologies in transportation planning that, in our knowledge and experience, we believe are the most appropriate. Nevertheless, such methodologies are necessarily also limited by the budgetary and time constraints in our scope of work, and by the current state of our knowledge.

The County should take care in planning and implementing any potential evacuation scenario and that this assessment should help the County better prepare for those events. We would be happy to conduct additional analyses in further detail, analyzing different scenarios, and employing other methodologies if desired. However, in no way can Fehr & Peers guarantee the efficacy of



any of the information used from this assessment as such would be beyond our professional duty and capability.

## Background

The following are recent pieces of legislation related to emergency access that are addressed in this assessment.

- AB 747 requires that the safety element be reviewed and updated to identify evacuation routes and their capacity, safety, and viability under a range of emergency scenarios. This will be a requirement for all safety elements or updates to a Local Hazard Mitigation Plan (LMHP) completed after January of 2022.
- SB 99 requires review and update of the safety element to include information identifying residential developments in hazard areas that do not have at least two emergency evacuation routes.

## Approach

As part of previous SB 99 work, parcels with only one access route in or out are identified and mapped in **Figures 1A, 1B, and 1C**. Also as part of previous SB 99 work, evacuation access County-wide was assessed by reviewing the distance evacuees must travel during an evacuation event based on information provided by Napa County staff. This assessment is a proxy for accessibility and can assist in identifying potentially vulnerable communities during an evacuation event by identifying areas of the County that need to travel the furthest and thus are potentially the most vulnerable in an evacuation event. We approached this assessment by measuring distances from each point along the County roadway network to designated evacuation zones in each of three scenarios, mapped in **Figures 2A, 2B, and 2C**, respectively. The three scenarios differ based on the extent of evacuations:

- Scenario A assumes that Calistoga, Saint Helena, Yountville, and the City of Napa are evacuation destinations.
- Scenario B assumes that Yountville and the City of Napa are evacuation destinations, and that Calistoga, and Saint Helena are also evacuating to these destinations.
- Scenario C assumes that only the City of Napa is an evacuation destination, and that Calistoga, Saint Helena, and Yountville are all evacuating there.

For the AB 747 Capacity Assessment, Fehr & Peers and County of Napa staff worked together to identify seven critical evacuation zones of the highest concern for further analysis. These were

chosen with consideration of fire history, as well access limitations identified from the as results from SB 99 analysis. These zones are:

- The community of Angwin
- The community of Berryessa Highlands, located on the south shore of Lake Berryessa and accessible via Steele Canyon Road
- The community of Berryessa Estates, located on the northern fork of Lake Berryessa formed by Putah Creek and accessible via Stagecoach Canyon Road
- The Calistoga area
- The Saint Helena area
- The Yountville area
- The areas on the western shore of Lake Berryessa, including Spanish Flat

## Evacuation Capacity Assessment

Consistent with the requirements of AB 747, we reviewed the capacity of the transportation system during an evacuation event for each of the seven identified zones listed previously. This assessment makes the following assumptions:

- The need for evacuation is assumed to be a wildland fire.
- No "shelter in place" is assumed – all residents, employees and visitors are assumed to evacuate from these zones.
- 100 percent occupancy of households is assumed. This assumption is discussed further in latter parts of this section and in Table 2.
- It is assumed that adequate staff would be available to control traffic at key intersections and prohibit through traffic from entering the evacuation zones.

Based on these preconditions, we developed three evacuation scenarios that correspond to Scenarios A, B, and C mentioned previously. Scenario 3 was separated into three sub-scenarios, which assume Geyserville / northern Sonoma County as a potential evacuation destination for none, some, and all Calistoga residents, respectively.

- *Scenario 1 (4 out of 7 zones identified need to evacuate)*  
This scenario assumes that only communities in the hills (that is, Angwin, Berryessa Highlands, Berryessa Estates, and the western shore of Lake Berryessa / the Spanish Flat area) need to evacuate.
- *Scenario 2 (6 out of 7 zones identified need to evacuate)*  
This scenario assumes that communities in the hills, as well as Saint Helena and Calistoga on the valley floor, need to evacuate to at least as far south as Yountville, but that

- Yountville and points south are safe.
- *Scenario 3.1 (all 7 zones identified need to evacuate)*  
This scenario assumes communities in the hills, as well as Saint Helena, Calistoga, and Yountville on the valley floor, need to evacuate, all to the City of Napa.
  - *Scenario 3.2 (all 7 zones identified need to evacuate)*  
This scenario assumes communities in the hills, as well as Saint Helena, Calistoga, and Yountville on the valley floor, need to evacuate, all to the City of Napa except for half of Calistoga evacuating to Geyserville.
  - *Scenario 3.3 (all 7 zones identified need to evacuate)*  
This scenario assumes communities in the hills, as well as Saint Helena, Calistoga, and Yountville on the valley floor, need to evacuate, all to the City of Napa except for Calistoga evacuating to Geyserville.

The evacuation routes for each of these scenarios are discussed further in the subsequent sections and evacuation destinations are shown in **Table 4**. For all communities in scenarios 1 and 2, as well as for all communities except for Calistoga in scenario 3 (as noted above), a location in Napa County is presumed to be the evacuation destination due to shorter evacuation distances and the relatively higher capacity of the routes.

The number of residents, anticipated vehicle ownership per household, and employees in the area were referenced to estimate the number of vehicles that would need to evacuate. **Table 1** summarizes land use information and vehicle ownership data for the evacuation zones.

**Table 1: Land Use and Evacuation Demand of Evacuation Zones**

| Evacuation Zone   | Households   | Population    | Employment    | Household Vehicle Ownership |              |              |              |            | Estimated Evacuation Demand* | Evacuating?  |               |               |
|---|--------------|---------------|---------------|-----------------------------|--------------|--------------|--------------|------------|------------------------------|--------------|---------------|---------------|
|   |              |               |               | 0                           | 1            | 2            | 3            | 4+         |                              | Scenario 1   | Scenario 2    | Scenario 3    |
| Angwin  | 1,139        | 3,716         | 683           | 32                          | 290          | 432          | 205          | 180        | 2,877                        | Yes          | Yes           | Yes           |
| Berryessa Estates                                       | 280          | 723           | 256           | 7                           | 75           | 100          | 74           | 25         | 780                          | Yes          | Yes           | Yes           |
| Western shore of Lake Berryessa, including Spanish Flat | 132          | 341           | 56            | 3                           | 35           | 47           | 35           | 12         | 307                          | Yes          | Yes           | Yes           |
| Berryessa Highlands                                     | 372          | 962           | 91            | 9                           | 99           | 132          | 98           | 33         | 803                          | Yes          | Yes           | Yes           |
| Calistoga area  | 2,096        | 5,564         | 2,362         | 170                         | 848          | 595          | 352          | 131        | 5,694                        | No           | Yes           | Yes           |
| Saint Helena area                                       | 2,865        | 7,203         | 7,119         | 192                         | 1,039        | 1,093        | 497          | 43         | 11,457                       | No           | Yes           | Yes           |
| Yountville area   | 1,169        | 3,662         | 3,178         | 157                         | 551          | 368          | 72           | 21         | 4,663                        | No           | No            | Yes           |
| <b>Total</b>  | <b>8,053</b> | <b>22,171</b> | <b>13,745</b> | <b>570</b>                  | <b>2,937</b> | <b>2,768</b> | <b>1,333</b> | <b>445</b> | <b>26,581</b>                | <b>4,767</b> | <b>21,918</b> | <b>26,581</b> |

Source: Sonoma-Napa Activity-Based Model 2040, American Community Survey 2015-19

\*Assumption of number of vehicles that will evacuate: zero-vehicle household: 1 vehicle; one-vehicle household: 1 vehicle; two-vehicle household: 2 vehicles; three-vehicle household: 2.5 vehicles; four-or-more-vehicle household: 3 vehicles; employee: 0.93 vehicle (there are 7% zero-vehicle households in evacuation zones).

The number of households in the area that would potentially have mobility constraints due to the lack of a personal vehicle during an evacuation event is summarized in **Table 2**. As shown, approximately seven percent of households across the seven zones do not have access to a vehicle. It should be noted that this information does not constitute a specific analysis of households with mobility challenges as it does not specifically account for people who have mobility impairments that preclude them from using a vehicle; it also does not specifically account for households that own one or more vehicles, but where not all members of the household may necessarily have access to them at all times (for example, a household with one vehicle which a household member drives to work, leaving other members of the household staying at home with no available vehicle).

**Table 2: Zero-Vehicle Households**

| Evacuation Zone   | Households   | Zero-Vehicle Households | Percent Zero-Vehicle Households |
|---|--------------|-------------------------|---------------------------------|
| Angwin  | 1,139        | 32                      | 3%                              |
| Berryessa Estates                                       | 280          | 7                       | 2%                              |
| Western shore of Lake Berryessa, including Spanish Flat | 132          | 3                       | 2%                              |
| Berryessa Highlands                                     | 372          | 9                       | 2%                              |
| Calistoga area  | 2,096        | 170                     | 8%                              |
| Saint Helena area                                       | 2,865        | 192                     | 7%                              |
| Yountville area   | 1,169        | 157                     | 13%                             |
| <b>Total</b>  | <b>8,053</b> | <b>570</b>              | <b>7%</b>                       |

*Source: Sonoma-Napa Activity-Based Model 2040, American Community Survey 2015-19.*

A worst-case condition was estimated where all employees and residents in the evacuation area would need to be evacuated according to **Table 1**. In the absence of detailed data for the evacuation zones, this assessment uses zero-vehicle households as a proxy to provide an estimate of persons with mobility constraints that may need evacuation assistance the zero-vehicle households would require outside assistance, and although outside the scope of this assessment, the County may want to consider a program that ensures a more accurate accounting of households needing assistance, and that evacuation of these households is achievable via public transit, special shuttle vehicles sent during evacuations, or other neighborhood programs that promotes advanced coordination of ridesharing during evacuations between neighbors. This estimate also assumes that employment centers would provide evacuation assistance to employees without access to a vehicle. Additionally, it was assumed that some households with more than two vehicles likely would not be able to utilize all of their vehicles during an evacuation event (e.g. homes with three or four vehicles but with only two licensed drivers).

## Evacuation Routes and Gateways

### *Roadways with Capacity Constraints*

As part of our conversations, Fehr & Peers and County staff also identified the following roadways to be unsuitable for general evacuation planning purposes:

- Berryessa-Knoxville Road / Morgan Valley Road
- Dry Creek Road / Trinity Road
- Oakville Grade
- Spring Mountain Road / Saint Helena Road
- Duhig Road / Ramal Road

These roadways were not considered as potential gateway links or routes for general evacuation in the AB 747 analysis.

Moreover, this analysis assumes that in scenarios 2 and 3, where residents from northern parts of the County must evacuate south to either Yountville or the City of Napa, State Route 29 will be the only available north-south route on the valley floor. Silverado Trail is situated close to the foothills and lies in a historic fire zone. In a historic fire scenario as represented in scenario 2 and 3, it is likely to be closed and unavailable for evacuation use due to fire conditions. Should Silverado Trail remain open during an evacuation event, it can supplement State Route 29 to provide additional north-south capacity.

### *Evacuation Routes and Gateways*

A critical factor in the success of an evacuation is how long it takes all evacuees to clear an area under threat. Conceptually, the time it takes to evacuate a given area is fundamentally constrained by key capacity constraints along the roadway system, otherwise known as "bottlenecks". Note that multiple bottlenecks may be present over the course of an evacuation route, and the high-level programmatic analysis in this assessment only considers a limited number of regional bottlenecks, which are selected after the segments noted above were excluded.

Routes to their respective evacuation destinations were identified for each of the seven evacuation zones being analyzed. For each zone, a roadway link from the Solano Napa Activity-Based Model (SNABM) that represents the bottleneck segment on its evacuation route was identified as its "evacuation gateway." For example, in scenario 1, Deer Park Road between Angwin and State Route 29 is considered the evacuation gateway for Angwin, as it is the sole egress for all evacuees from Angwin heading to Saint Helena. The list of evacuation gateways and their capacities are shown in **Table 3**.

The roadway capacities presented in **Table 3** and used by this analysis are based on those found in the Solano Napa Activity-Based Model (SNABM), with some modifications made to account for perceived discrepancies with current real-world conditions under normal operating conditions. This assessment conservatively assumes that roadway capacities during evacuation events will be as they are in normal conditions, and not be increased by measures such as the implementation of contraflow lanes.

**Table 3: Total Outbound Capacity of Evacuation Gateway Links**

| Roadway Name   | Outbound Lanes | Total Outbound Capacity (vehicles per hour) |
|--|----------------|---|
| 1. Deer Park Road (between Angwin and State Route 29 at Saint Helena)  | 1              | 900   |
| 2. State Route 29 (between Saint Helena and Yountville)  | 1              | 1,600                                       |
| 3. State Route 29 (between Yountville and Salvador)  | 2              | 2,800                                       |
| 4. Snell Valley Road/Butts Canyon Road/Pope Valley Road (between Berryessa Estates and Howell Mountain Road) | 1              | 900   |
| 5. Howell Mountain Road (between Snell Valley Road and Angwin)   | 1              | 900   |
| 6. Berryessa Knoxville Road (between Spanish Flat and State Route 128)                                       | 1              | 900   |
| 7. State Route 128 (between Berryessa Knoxville Road and State Route 121)                                    | 1              | 900   |
| 8. State Route 121 (between Berryessa Highlands and Wooden Valley Road)                                      | 1              | 1,600                                       |
| 9. State Route 128 (between Calistoga and Napa County Line)  | 1              | 1,600                                       |
| 10. State Route 128 (between Napa County Line and Geyserville)   | 1              | 1,050                                       |

*Source: Sonoma-Napa Activity-Based Model 2040, American Community Survey 2015-19*

**Table 4** presents the evacuation gateway links and the zones each gateway is associated with for each scenario – note that evacuation gateways can be associated with multiple zones that must use it to evacuate; similarly, depending on the evacuation scenario, an evacuation zone can be associated with multiple evacuation gateways if the evacuation route from that zone passes through multiple gateways to reach its evacuation destination. The table also shows the combined number of households and vehicle demand for all zones associated with each evacuation gateway.

Each evacuation gateway has a fixed capacity (usually noted in vehicles per hour), and dividing the gateway capacity into the total evacuation vehicle demand yields the time it takes for all vehicles to pass through the gateway from the evacuation zone. Using the estimated vehicle demand at each gateway and dividing by the estimated hourly outbound capacity for that



gateway, **Table 4** also presents an estimated time required to clear all vehicles at the gateway. Note that this time estimate is not an estimated average travel time for evacuees traveling from the evacuation zone to the evacuation destination, nor is it the estimated travel time through the roadway link segment that makes up the gateway. Instead, it reflects the comparison between the evacuation demand of the zones served by that gateway, and provides a rough estimate for the time it would take for the specified number of vehicles to pass through the gateway given its roadway capacity. Moreover, this assessment only takes into account the vehicle demand from the seven evacuation zones, and not any other traffic that may be present.

As shown, the total vehicle demand at many of the evacuation gateways significantly exceed their respective hourly outbound capacities. **Table 4** also presents an alternative scenario, in which the vehicle demand is equivalent to an average of one vehicle per household, which produces much shorter and more manageable time estimates for clearing the gateways.

**Table 4: Evacuation Time Required Under Each Evacuation Scenario**

| Evacuation Zone   | Evacuation Gateway Link | Evacuation Destination | Estimated Evacuation Demand | Number of Households | Total Outbound Capacity (vehicles per hour) | Time Required for Vehicles to Pass Through at Gateway (hours) |                           |  |
|---|-------------------------|------------------------|-----------------------------|----------------------|---|---|---------------------------|--|
|   |                         |                        |                             |                      |   | Total Vehicle Demand  | One Vehicle per Household |  |
| Scenario 1 - Only communities in the hills need to evacuate   |                         |                        |                             |                      |   |   |                           |  |
| Angwin and Berryessa Estates  | Deer Park Road          | Saint Helena           | 3,657                       | 1,419                | 900   | 4.06  | 1.58                      |  |
| Spanish Flat and Berryessa Highlands  | State Route 121         | City of Napa           | 1,110                       | 504                  | 1,600                                       | 0.69  | 0.32                      |  |
| Scenario 2 - Communities in the hills, as well as Saint Helena and Calistoga on the valley floor, need to evacuate to at least as far south as Yountville   |                         |                        |                             |                      |   |   |                           |  |
| Angwin and Berryessa Estates  | Deer Park Road          | Saint Helena           | 3,657                       | 1,419                | 900   | 4.06  | 1.58                      |  |
| Angwin, Berryessa Estates, Calistoga, and Saint Helena  | State Route 29          | Yountville             | 20,808                      | 6,380                | 1,600                                       | 13.00   | 4.00                      |  |
| Spanish Flat and Berryessa Highlands  | State Route 121         | City of Napa           | 1,110                       | 504                  | 1,600                                       | 0.69  | 0.32                      |  |
| Scenario 3.1 - Communities in the hills, as well as Saint Helena, Calistoga, and Yountville on the valley floor, need to evacuate to the City of Napa   |                         |                        |                             |                      |   |   |                           |  |
| Angwin and Berryessa Estates  | Deer Park Road          | Saint Helena           | 3,657                       | 1,419                | 900   | 4.06  | 1.58                      |  |
| Angwin, Berryessa Estates, Calistoga, and Saint Helena  | State Route 29          | Yountville             | 20,808                      | 6,380                | 1,600                                       | 13.00   | 3.99                      |  |
| Angwin, Berryessa Estates, Calistoga, Saint Helena, and Yountville  | State Route 29          | City of Napa           | 25,471                      | 7,549                | 2,800                                       | 9.10  | 2.70                      |  |
| Spanish Flat and Berryessa Highlands  | State Route 121         | City of Napa           | 1,110                       | 504                  | 1,600                                       | 0.69  | 0.32                      |  |
| Scenario 3.2 - Communities in the hills, as well as Saint Helena, Calistoga, and Yountville on the valley floor, need to evacuate - all communities to the City of Napa, except for half of Calistoga evacuating to Geyserville |                         |                        |                             |                      |   |   |                           |  |
| Angwin and Berryessa Estates  | Deer Park Road          | Saint Helena           | 3,657                       | 1,419                | 900   | 4.06  | 1.58                      |  |
| Angwin, Berryessa Estates, Calistoga (50%), and Saint Helena  | State Route 29          | Yountville             | 17,961                      | 5,332                | 1,600                                       | 11.23   | 3.33                      |  |
| Angwin, Berryessa Estates, Calistoga (50%), Saint Helena, and Yountville  | State Route 29          | City of Napa           | 22,624                      | 6,501                | 2,800                                       | 8.08  | 2.32                      |  |
| Spanish Flat and Berryessa Highlands  | State Route 121         | City of Napa           | 1,110                       | 504                  | 1,600                                       | 0.69  | 0.32                      |  |
| Calistoga (50%)   | State Route 128         | Geyserville            | 2,847                       | 1,048                | 1,050                                       | 2.71  | 1.00                      |  |

**Table 4: Evacuation Time Required Under Each Evacuation Scenario**

| Evacuation Zone  | Evacuation Gateway Link | Evacuation Destination | Estimated Evacuation Demand | Number of Households | Total Outbound Capacity (vehicles per hour) | Time Required for Vehicles to Pass Through at Gateway (hours) |                           |
|--|-------------------------|------------------------|-----------------------------|----------------------|---|---|---------------------------|
|  |                         |                        |                             |                      |   | Total Vehicle Demand  | One Vehicle per Household |
| Scenario 3.3 - Communities in the hills, as well as Saint Helena, Calistoga, and Yountville on the valley floor, need to evacuate. All communities to the City of Napa, except Calistoga evacuating to Geyserville |                         |                        |                             |                      |   |   |                           |
| Angwin and Berryessa Estates   | Deer Park Road          | Saint Helena           | 3,657                       | 1,419                | 900   | 4.06  | 1.58                      |
| Angwin, Berryessa Estates, and Saint Helena  | State Route 29          | Yountville             | 15,114                      | 4,284                | 1,600                                       | 9.45  | 2.68                      |
| Angwin, Berryessa Estates, Saint Helena, and Yountville  | State Route 29          | City of Napa           | 19,777                      | 5,453                | 2,800                                       | 7.06  | 1.95                      |
| Spanish Flat and Berryessa Highlands   | State Route 121         | City of Napa           | 1,110                       | 504                  | 1,600                                       | 0.69  | 0.32                      |
| Calistoga  | State Route 128         | Geyserville            | 5,694                       | 2,096                | 1,050                                       | 5.42  | 2.00                      |

It is also important to note that emergency scenarios are often unpredictable and driver behavior can be disorderly. Additionally, evacuation events are not linear in nature (e.g. even distribution during the evacuation time period) and it is anticipated that evacuees would vacate at a rate that more closely resembles a bell curve from the time that the evacuation order is issued. These are conditions which would affect the total evacuation time estimated in our assessment that are beyond the scope and budget of our assessment. There is also general unpredictability in operational issues, such as power issues that would trigger traffic signals to operate in “red flash mode” in which traffic would need to proceed through intersections in an all-way stop configuration.

## Project Impacts

The only Housing Inventory Site location identified as part of the Housing Element process that falls into one of the seven zones is Spanish Flat, with the addition of 100 housing units. This analysis assumes that this will result in 100 additional households in the area with similar characteristics as the existing households. **Table 5** summarizes the changes to the number of households and vehicles in the zone with project, and **Table 6** shows the resulting changes in estimated evacuation times. As shown, the additional household would result in a 22% increase in evacuation times assuming full evacuation demand, or a 19% increase in evacuation times assuming only one vehicle per household evacuates. In either case, however, total evacuation times remain well under one hour.

**Table 5: Evacuation Demand of Spanish Flat, with Project**

| Evacuation Zone   | Households | Household Vehicle Ownership |    |    |    |    | Estimated Evacuation Demand* |
|---|------------|-----------------------------|----|----|----|----|------------------------------|
|   |            | 0                           | 1  | 2  | 3  | 4+ |                              |
| Western shore of Lake Berryessa, including Spanish Flat, existing     | 132        | 3                           | 35 | 47 | 35 | 12 | 307                          |
| Western shore of Lake Berryessa, including Spanish Flat, with project | 232        | 6                           | 62 | 82 | 61 | 21 | 540                          |

**Table 6: Evacuation Time Required for the Spanish Flat Area, with Project**

| Evacuation Zone   | Evacuation Gateway Link | Evacuation Destination | Estimated Evacuation Demand | Number of Households | Total Capacity (vehicles per hour) | Time Required on the Gateway Link to Evacuate (hours) |                           |
|---|-------------------------|------------------------|-----------------------------|----------------------|------------------------------------|---|---------------------------|
|   |                         |                        |                             |                      |                                    | Total Vehicle Demand                                  | One Vehicle per Household |
| Scenario 1 - Only communities in the hills need to evacuate |                         |                        |                             |                      |                                    |   |                           |
| Spanish Flat and Berryessa Highlands, existing              | State Route 121         | City of Napa           | 1,110                       | 504                  | 1,600                              | 0.69  | 0.32                      |
| Spanish Flat and Berryessa Highlands, with project          | State Route 121         | City of Napa           | 1,343                       | 604                  | 1,600                              | 0.84  | 0.38                      |
| change with project   |                         |                        | 233                         | 100                  |                                    | 0.15  | 0.06                      |

## Next Steps

As a target for further investigation and study, the following lists provide potential measures that can enhance the evacuation process through both the supply side (increasing evacuation capacity) and demand side (managing evacuation volumes).

### *Supply-side Strategies*

- Increasing capacity through the use of contraflow lanes or shoulders
- Managed traffic control, including turn restrictions and route or ramp closures, to maximize outflows from evacuation areas
- Faster clearing of fire-induced road closures
- Street parking management on high hazard days.

### *Demand-side and Information-Side Strategies*

- Communication systems and strategies that improve disaster alerts
- Dynamic route guidance and monitoring
- Phased evacuations
- Reducing vehicle volumes during evacuations, such as by requiring households to evacuate in as few vehicles as possible.

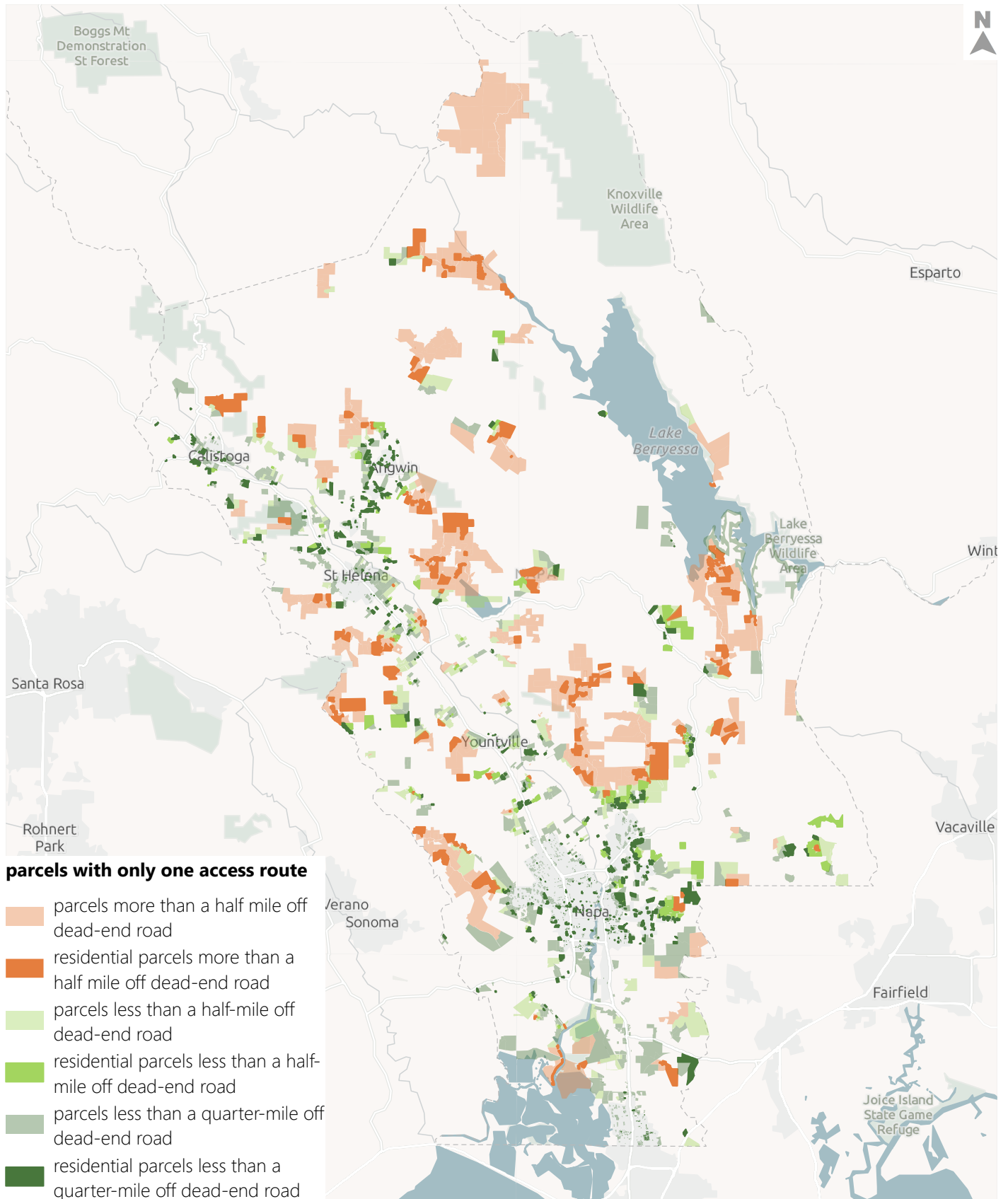


Figure 1A  
SB 99 - Parcels With Only One Access Route

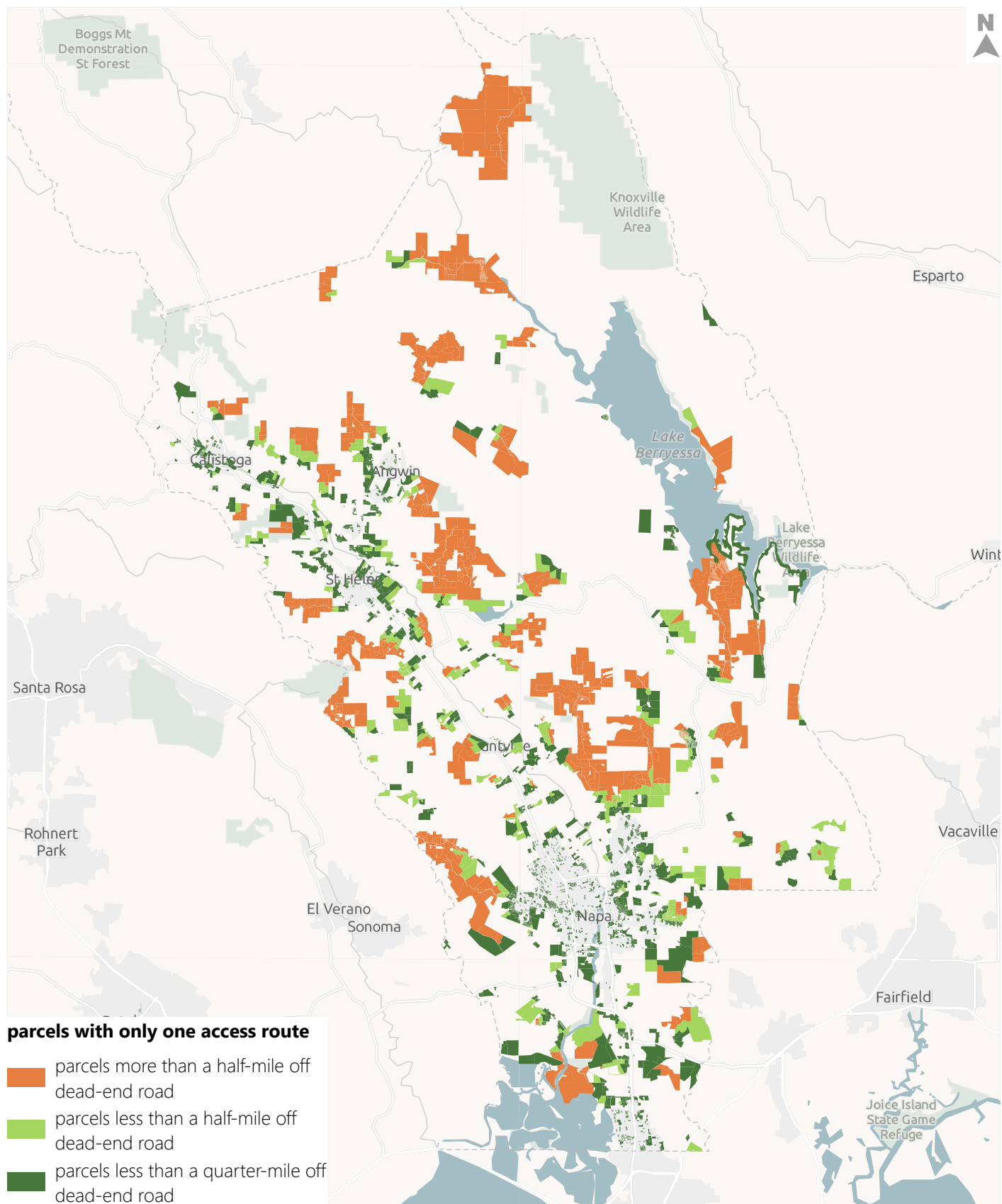


Figure 1B  
SB 99 - Parcels With Only One Access Route



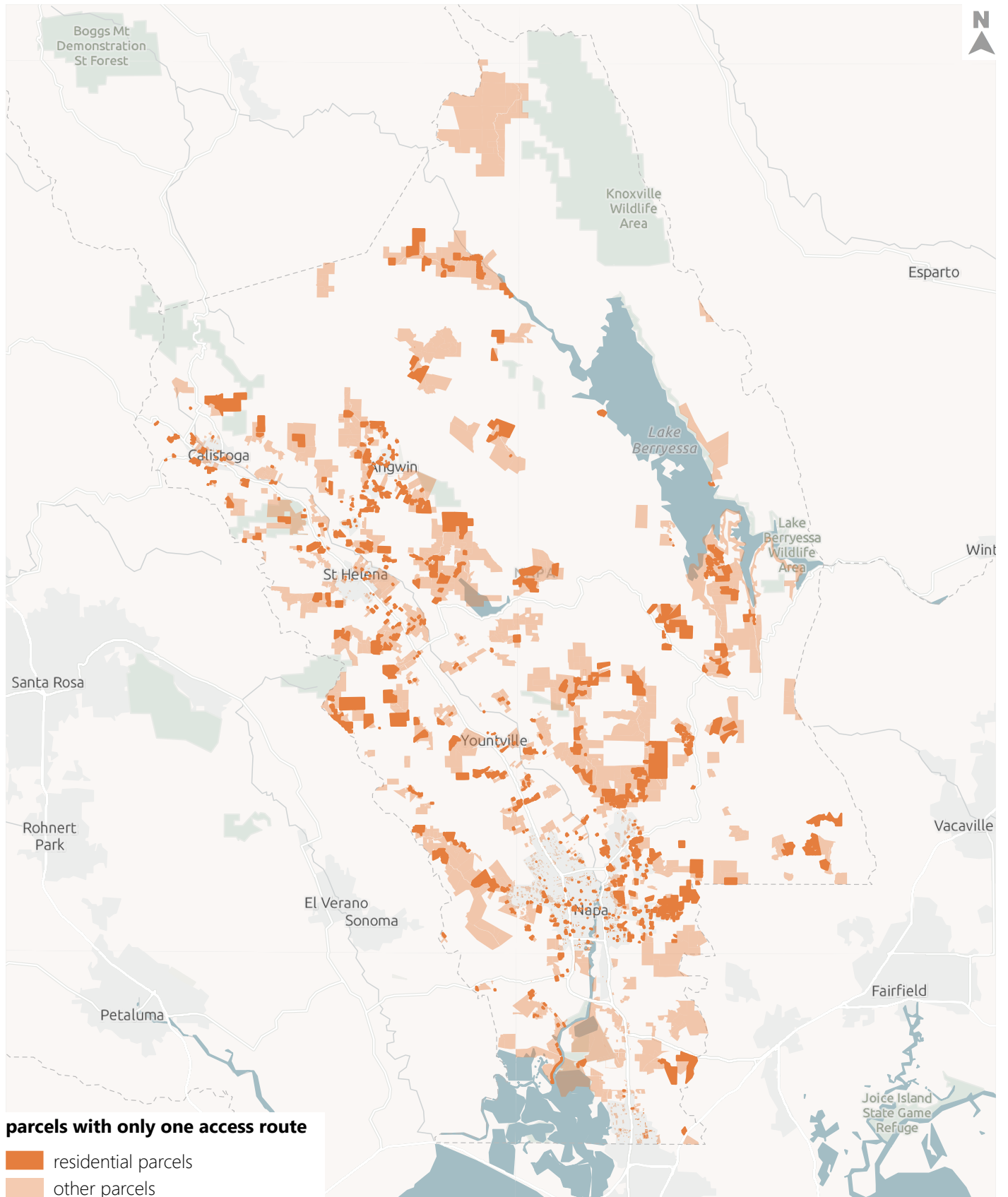


Figure 1C  
SB 99 - Parcels With Only One Access Route

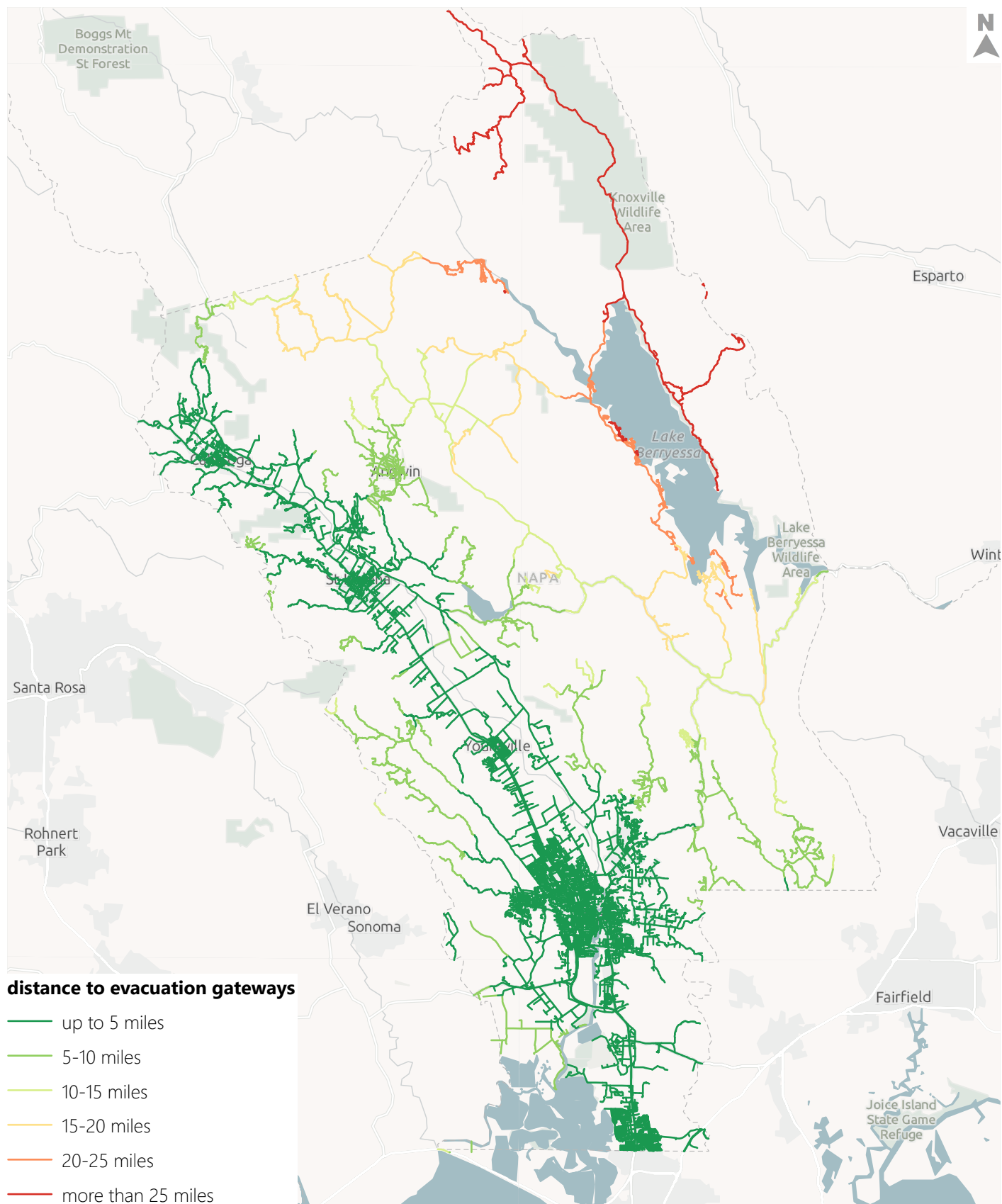


Figure 2A

SB 99 - Distances to Evacuation Gateways  
(All Valley Floor Communities Safe)



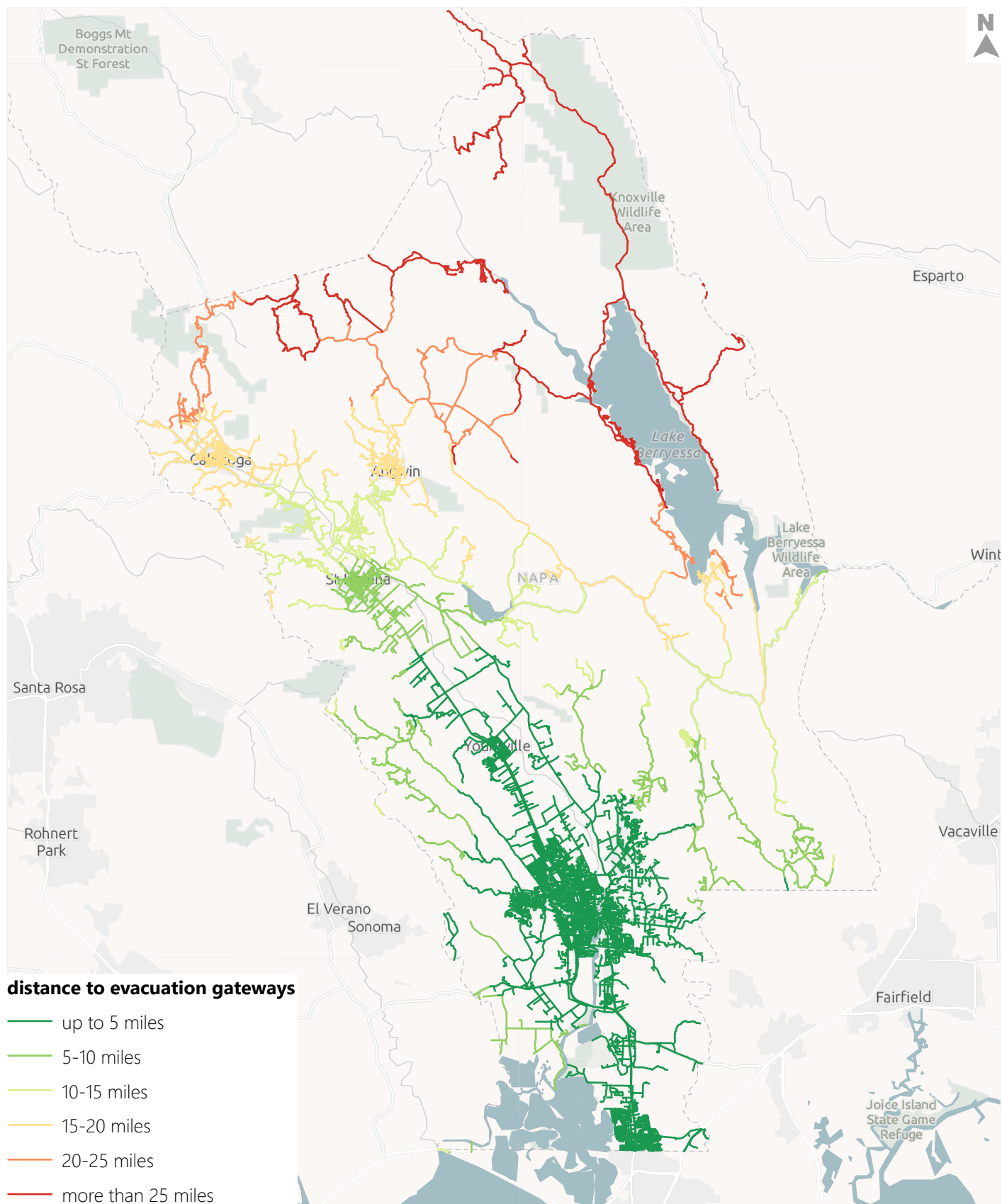


Figure 2B

SB 99 - Distances to Evacuation Gateways  
(Calistoga and St. Helena Also Evacuating)



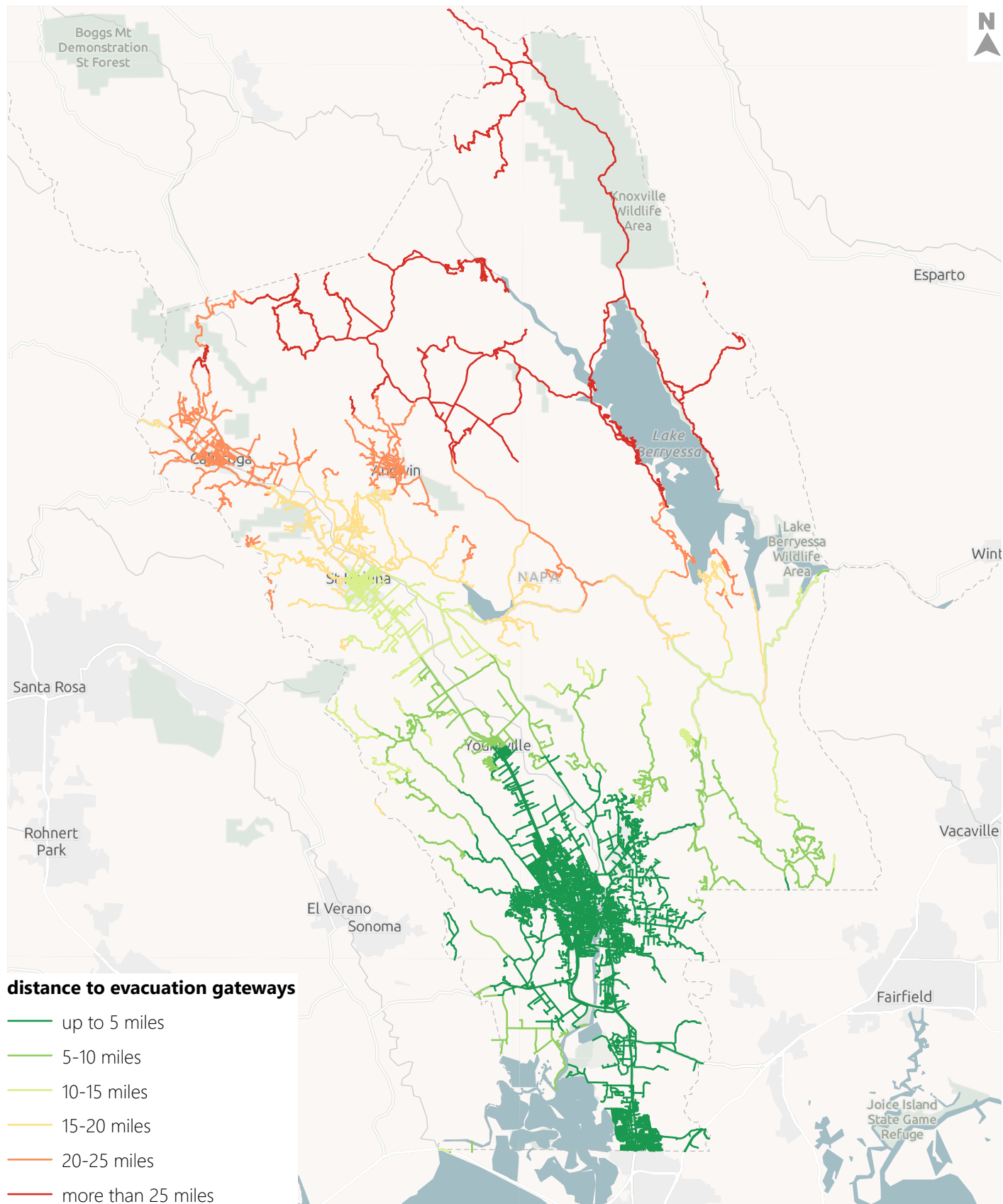


Figure 2C

SB 99 - Distances to Evacuation Gateways  
(Calistoga, St. Helena, and Yountville Also Evacuating)

