

6. Alternatives Analysis

6.1 Introduction

CEQA has long recognized that a rigorous evaluation of project alternatives is key to ascertaining whether major environmental impacts brought about by a proposed Project can be avoided or significantly lessened. CEQA and its associated case law require that alternatives be evaluated that are capable of feasibly attaining most of the basic Project objectives and offering substantial environmental advantages over the project proposed. CEQA does not require that an agency speculate unnecessarily or re-evaluate previously analyzed alternatives where no new significant information – i.e., in an earlier CEQA document – shows that such alternatives will now be feasible. Additionally, CEQA does not require that the agency evaluate ostensibly infeasible alternatives, or address alternatives that are independent of the goal of reducing environmental impacts.

Therefore, an adequate alternatives analysis is focused on avoiding or substantially lessening the significant environmental impacts brought on by the project as proposed taken in the context of previous environmental and policy evaluations. CEQA is not intended to be used as a means of studying alternative dispositions of a project independent of the environmental impacts that attend it. In other words, CEQA does not require the EIR to address alternatives that are unrelated to the reduction of impacts.

The City of Napa General Plan, which was adopted in 1998 and updated in 2015, designates the site as Corporate Park (CP). The City Zoning Code designates the site as Industrial Park (IP-A, IP-B). The Project includes approval of Planned Development Overlay for over-height features and shared parking as well as a Use Permit to allow a hotel in the IP-A zoning district.

To allow an appropriate context for evaluating alternatives, CEQA requires that the Lead Agency enumerate the basic Project objectives. This disclosure assists in developing the range of Project alternatives to be investigated in this section, as well as providing a rationale for the adoption of a Statement of Overriding Considerations, if one is adopted. Listed below are the main goals and objectives as stated in Section 4.7, Project Objectives (page 4-68).

- Comply with the City's General Plan
- Provide a high quality mixed-use project consistent with the intent of the City of Napa Zoning Code
- Provide safe access at the Project site including adequate wayfinding information for vehicular access to and within the Project site
- Provide safe pedestrian and bicycle access within the Project site
- Design a project consistent with the Napa Valley Commons Design Guidelines

Although CEQA calls for the evaluation of alternatives that could feasibly attain most of the basic purposes of the Project, the central goal of the EIR alternatives analysis is to reduce or eliminate environmental effects of the proposed Project that have been identified in the analytical portions of the EIR (CEQA Guidelines §15126.6), not to evaluate Project

alternatives that are not capable of reducing impacts, or that are merely variations on a theme.

It is the intent of this section to describe, or reference the description of, reasonable and feasible alternatives to the proposed Project that could attain most of the basic Project objectives and avoid or substantially lessen any significant effects of the project. These alternatives appeal to a wide range of mitigation and palliative effects, and provide a strong foundation for public discussion. Sufficient information is presented herein to create variations of alternatives, if desired.

6.2 Feasibility

Section 15126.6(f)(1) of the CEQA Guidelines explains how feasibility is to be considered for alternatives capable of otherwise resolving environmental impacts resulting from the Project as proposed. This section states that among the factors that may be considered in determining feasibility are:

- Site suitability
- Economic viability
- Availability of infrastructure
- General Plan consistency
- Other plans and regulatory limitations
- Jurisdictional boundaries (projects with regionally significant impacts should consider the regional context)
- Whether the proponent can reasonably acquire, control or otherwise have access to an alternative site or off-site areas

6.3 Alternatives Considered But Not Advanced

CEQA does not require that the discussion of alternatives be exhaustive, or demand evaluation of alternatives that are not realistically possible, given the failure to meet the basic Project objectives and limitation of time, energy, and funds. The EIR does not consider alternatives that are infeasible, and the alternatives discussed in this section were rejected for the following reasons:

- The project alternative is considered infeasible due to failure to carry out the basic goals and objectives of the proposed Project.
- The project alternative is considered infeasible because its implementation is remote and speculative.
- The project alternative would not avoid or substantially lessen significant effects of the Project.

The following Project alternative was considered but not advanced for future review. This alternative fails to carry out the goals and objectives of the proposed Project.

- **Alternative Location** – The Project site is consistent with the City of Napa General Plan for development with a hotel, office and winery as proposed. The Project Applicant is the owner of the property, and the Project site is located within the Industrial Park designation in the City’s Zoning Code. The Project Applicant does not own a similar property in the Napa Valley Commons corporate park or the near vicinity. The Project site has readily available roads, utilities, and service connections within a well-established corporate park environment. The downtown Napa area was not considered because a sufficiently sized parcel for an equivalent hotel, winery and office development and associated parking is not available. Additionally, the costs associated with such downtown development, including a parking structure, would be prohibitive to achieve an economically feasible project. Therefore, an alternative location, if available, could potentially result in more significant impacts than the proposed Project and was, therefore, not considered as a feasible alternative.

6.4 Alternatives Presentation

The range of alternatives required in an EIR is governed by a “rule of reason” that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice (CEQA Guidelines §15126.6(f)). With the historical and regulatory context as a backdrop, a review can proceed of alternatives to the Project that minimize impacts brought about by the Project and are not addressed in other CEQA documents. The reader will find two alternatives in this section.

- **No Project Alternative** – This alternative allows decision-makers to compare the impacts of approving the proposed Project with the impacts of not approving the proposed Project and leaving the site in its current condition.
- **Reduced Intensity/Reduced Hotel Size** – This alternative reduces the hotel component from a dual brand hotel consisting of a total of 253 units to a single brand consisting of 100 units.

Table 6-1 Summary Matrix of Impacts of Alternatives in Relation to Proposed Project as Mitigated

Alternative	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Geology/Soils	Greenhouse Gas	Hazards/Hazardous Materials	Hydrology/Water Quality	Land Use & Planning	Noise	Population/Housing	Public Services	Traffic/Transportation	Tribal Cultural Resources	Utilities/Service Systems
Alternative 1 - No Project	-	-	-	*	-	-	*	+	-	-	-	*	-	*	-
Alternative 2 – Reduced Intensity/Reduced Hotel Size	*	-	-	*	*	-	*	*	-	*	*	*	-	*	-
+ Potential impacts are greater than proposed Project - Potential impacts are less than proposed Project * Potential impacts are equal to proposed Project															

6.5 Project Alternative 1 – No Project

6.5.1 Description of Alternative

The No Project Alternative assumes that the Project would not be built as described in this EIR. A review of the No Project Alternative must be included in every EIR pursuant to state law. Impacts from the proposed Project would not be as stated in the EIR. The proposed Project is designated Corporate Park in the General Plan Land Use Element. This category permits manufacturing, warehousing and office, public and quasi-public uses, and similar compatible uses in a campus-like setting. Development in this designation is required to have integrated design requirements, including extensive landscaping and unifying design features.

The Project is designated Industrial Park (IP-A, IP-B) under the City’s Zoning Code. Areas A and B within the industrial park district are zoned for professional and business offices, research and development and certain light industrial uses in enclosed buildings, and limited hotel accommodations and retail and service uses such as restaurants, convenience markets, banks, and service stations primarily for area workers or business visitors. Permitted uses also include wine tasting rooms, retail sales and related uses accessory to wine manufacture or bottling.

Section 15126.6(e)(2) of the CEQA Guidelines states:

The “no project” analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

Section 15126.6(e)(3)(B) of the CEQA Guidelines indicates that when the project is not a land use or regulatory plan, the “no project” alternative:

... is the circumstance under which the project does not proceed. Here the discussion would compare the environmental effects of the property remaining in its existing state against environmental effects which would occur if the project is approved. If disapproval of the project under consideration would result in predictable actions by others ... this “no project” consequence should be discussed.

Because the Project site is largely undeveloped, with the exception of the presence of shrubs, grasses, and trees that are regularly groomed, the No Project Alternative would not involve any new or additional environmental impacts.

1. Aesthetics

The No Project Alternative would result in the site being left in its current condition, sparsely covered with trees and vegetation. The majority of the mature trees are located at the corner of Napa Valley Corporate Way and State Route 221 and along the western boundary of the Project site and immediately adjacent developed parcel.

The proposed Project would result in greater impacts due to the construction of the hotel(s), office building and winery where no development currently exists. With the No Project Alternative, views across the Project site would not be altered, and typical night lighting would not occur. Although it has been determined that the proposed Project would not result in Aesthetics impacts, the No Project Alternative would allow an open space area within the corporate park to remain with views of natural vegetation and would, therefore, be marginally superior.

2. Air Quality

Under the No Project Alternative, the Project site would remain as a sparsely vegetated open space area that is regularly groomed. From an environmental standpoint, no air quality environmental impacts result from the Project site in its current condition, because no thresholds would be exceeded. Analysis for the proposed Project shows that construction and operational emissions are all below the significance thresholds established by the BAAQMD. Therefore, no local or regional adverse impacts to air quality are projected during Project construction or operation. However, even with impacts under the proposed Project being identified as less than significant, there are incremental impacts to air quality which would not occur under the No Project Alternative. Therefore, the No Project alternative is marginally superior to the proposed Project.

3. Biological Resources

The No Project Alternative allows the site to remain in an undisturbed condition relative to biological resources. The open space vegetation would continue to function through growth and the provision of potential foraging area and habitat for local species. By comparison, the proposed Project will impact several of the existing trees on the Project site. Of these, four trees require preservation per the City of Napa’s municipal code. The Tree Protection

Guidelines prepared for the proposed Project state that 43 of the 46 remaining non-protected trees are worth preserving based on their condition. These trees will be minimally impacted by the Project, because they are located generally along the perimeter of the site and outside the footprint of the new buildings. A Tree Protection and Preservation Plan for the proposed Project will define which of the non-protected trees will be retained.

With regard to special status plants and wildlife, a biological resources report determined there are no special status animals, plants, or wildlife observed on the site; however, several species of animals have limited to moderate potential to occur on the site. The following have the potential to occur: golden eagle, ferruginous hawk, Swainson's hawk, northern harrier, and white-tailed kite. There is also the potential for nesting birds in the trees and shrubs on site and for the occurrence of seasonal wetlands.

As analyzed, mitigation provided for potential impacts to biological resources in the form of avoidance and payment of mitigation fees will reduce any impacts to less than significant. However, the No Project Alternative would allow the site to remain in its current condition; therefore, no impacts would occur, and no mitigation would be required. The No Project Alternative is marginally superior to the proposed Project with respect to impacts to biological resources.

4. Cultural Resources

The results of the Archaeological Inventory Survey indicate there are no known archaeological resources within the Project area. The report notes that, based on the absence of any contributing components of any significant historical resources/ unique archaeological resources within the area of potential effect (APE), archaeological clearance is recommended for the project/undertaking as currently proposed. With the mitigation included herein, Project development would not significantly alter any regional or cumulative cultural, scientific, or historic resources.

The No Project Alternative would not reduce or increase the potential for impacts to cultural resources, because no impacts are anticipated with Project implementation. Therefore, impacts in the area of Cultural Resources will be the same as compared to the proposed Project.

5. Geology and Soils

Under the No Project Alternative, no earthwork would occur and, therefore, no impacts to existing geological conditions on the site would result. The Geology and Soils analysis has determined that, based on the engineering analysis, the proposed Project can be built as planned, provided the recommendations presented in the geological report are incorporated into its design and construction. The report did not identify any unusual or significant geological issues such as faulting, seismicity, soil quality, or landslides, among others. However, grading could result in erosion or the loss of topsoil, requiring preparation of an erosion control plan that has been included as mitigation. This potential would not occur with the No Project Alternative, as no ground disturbance would occur. Therefore, the No Project Alternative is marginally superior as compared to the proposed Project in terms of impacts.

6. Greenhouse Gas Emissions

The No Project Alternative would have no impact on greenhouse gas emissions (GHG), because no construction or development will occur that could create GHG. The proposed Project would produce GHG both during construction and during long-term operation. In year 2020 (buildout), annual net emissions resulting from the operation of the proposed Project are estimated to be 2,277 MTCO_{2e} without mitigation and 2,058 MTCO_{2e} with mitigation, which exceeds the BAAQMD threshold of 1,100 MTCO_{2e}. Therefore, the No Project Alternative is superior to the proposed Project because no GHG emissions would occur.

7. Hazards and Hazardous Materials

National Due Diligence Services (NDDS) conducted a site reconnaissance to assess the possible presence of petroleum products and hazardous materials at the Project site. The assessment revealed no evidence of a recognized environmental condition (REC), a controlled REC or a Historical REC in connection with the Project site. No other environmental issues of concern were identified, and no further investigations were recommended. In addition, the Project site is not within the City's Urban/Wildland Interface with potential for the occurrence of wildfires. The Project does not propose any uses that would result in the presence of hazardous materials or hazardous conditions.

Neither the No Project Alternative nor the proposed Project would result in impacts due to hazards or hazardous materials. Therefore, both are substantially the same with respect to potential impacts.

8. Hydrology and Water Quality

Drainage currently flows across the Project site towards Napa Valley Corporate Drive. To meet the current City criteria, the proposed on-site storm system will include an underground storage vault. This vault will be designed to detain the differential volume between the 25- and 10-year rainfall events. The proposed storm water and detention system will convey storm runoff north and west through the Project site, with a new connection to the existing underground storm drain piping in Napa Valley Corporate Drive along the west frontage of the Project. The winery wastewater will be held in a subterranean tank beneath the winery and transferred through an underground piping system to an on-site wastewater treatment area located immediately across the internal drive aisle from the winery. The resultant pure water will be stored in tanks in the wastewater treatment area and dispersed through the Project's landscape irrigation system, which will be directly connected to the pure water storage tanks.

Under existing conditions, the underground storm system within Napa Valley Corporate Drive collects the storm water and directs it to South Creek (at the west side of Napa Valley Corporate Drive, past Napa Valley Corporate Way) and eventually into Napa River Marsh. With the No Project Alternative, there will be no new detention system to convey storm water runoff. The proposed Project will provide bio-filtration of runoff and self-treating permeable pavement to filter pollution from the storm water runoff. The No Project Alternative would not provide improvements to drainage or water quality due to storm water runoff. Therefore, the proposed Project will have a more positive impact on hydrology and

water quality compared to allowing the site to remain in its current condition under the No Project Alternative.

9. Land Use and Planning

The No Project Alternative would not require a Conditional Use Permit to allow a hotel in the Industrial Park (IP-A) zoning district and a winery in the Industrial Park zoning district. Approval of a Planned Development Overlay would also not be required to allow for shared parking and an increase in height for the winery and office buildings. Therefore, the No Project Alternative would result in fewer impacts related to land use and planning, because no Conditional Use Permits or Overlays would be required.

10. Noise

Under the No Project Alternative, current noise levels on the site would remain unchanged with intermittent noise generated from the landscaping equipment used to groom the site. The proposed Project would introduce new uses to the site. Analysis shows that short-term construction activities could generate noise levels above the City thresholds. Assuming that all construction activities for the proposed Project are conducted in accordance with Section 8.08.025 of the Napa Municipal Code, noise generated by construction activities would not be in excess of the established standards. Operational noise for each component of the Project was analyzed and, with incorporation of mitigation measures and conditions of approval, was shown to be less than significant.

The Noise Analysis for the Project shows that the proposed Project will not result in short-term or long-term noise impacts that cannot be reduced to less than significant levels through implementation of the mitigation measures, conditions of approval, and best management practices identified herein. However, due to the addition of Project-related traffic to the cumulative condition, the No Project Alternative is marginally superior, because no new traffic would be added to the average daily trip totals at any of the study area intersections, and no resulting noise from the additional traffic would occur.

11. Population and Housing

The proposed Project does not include the construction of new residences and will not add to the population by increasing the population generally. However, the Project will provide jobs that could encourage the addition of employees who would seek housing in the City of Napa. The Project will be required to contribute to the City's established Affordable Housing fee program to assist the City in providing services and housing for lower income households. The No Project Alternative would not result in the significant fee payment towards affordable housing that will be provided by the Project. However, it would also not result in the housing demand created by the proposed Project. Therefore, while the proposed Project has a positive and beneficial impact on the City's ability to provide affordable housing, the No Project Alternative would result in less impacts as no housing demand would occur.

12. Public Services

The No Project Alternative would not require the addition of services or facilities related to police and fire protection, emergency medical services, schools, parks, or libraries. The proposed Project will require provision of police, fire, and emergency medical services and will include payment of fees towards additional or improved police and fire services as required by the City's Municipal Code. However, the No Project Alternative would not result in the requirement for additional services and no impacts to existing services would occur. Therefore, the No Project Alternative is superior to the proposed Project as there would be no new or more significant impacts resulting from the Project site remaining undeveloped and additional or expanded public services would not be required.

13. Transportation and Traffic

The No Project Alternative would not add traffic to the existing roadways, some of which are operating at unacceptable levels of service currently. The proposed Project will generate approximately 1,946 daily trips. The traffic analysis reviewed 12 intersections in the Project vicinity, and two intersections were identified to operate at unacceptable levels under both Existing Conditions and Existing Plus Project conditions. Under Cumulative Plus Project Conditions, seven study intersections will operate at unacceptable levels of service without mitigation. However, implementation of mitigation measures will result in less than significant impacts, including under cumulative conditions. However, the No Project Alternative is superior to the proposed Project because there will be no impact related to traffic and no additional traffic would be added to already deficient intersections.

14. Tribal Cultural Resources

The No Project Alternative would not disturb or contribute to the destruction of any archaeological, paleontological, or tribal cultural resources, because there would be no ground disturbance and no construction. The distinction for Tribal Cultural Resources is that they are described as a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe. According to the Northwest Information Center, no prehistoric or historic-era sites have been documented within the Project area surveyed. Likewise, no prehistoric or historic-era sites were identified during the pedestrian survey conducted for Project analysis by NDDS. Therefore, the proposed Project construction would not disturb or destroy any such resources as none are known to exist on the Project site. The No Project Alternative and the proposed Project are identical, because neither would result in significant environmental impacts to tribal cultural resources.

15. Utilities and Service Systems

The No Project Alternative would not require the use of utilities or service systems, because no development would occur. Utilities and service systems are currently available to the Project site, as the site is within the developed Napa Valley Commons corporate park. New development has the ability to connect to existing water, recycled water, sewer, electrical, gas, and cable connections, and the provision of utilities was considered when the corporate park was built. Because the utilities have existing adequate capacity to accommodate the

Project's proposed needs, no impacts would occur. Therefore, impacts will be less than significant. The No Project Alternative would not require the use of gas, electricity, or water, would result in conservation of the resource and is, therefore, marginally superior to the proposed Project.

6.5.2 Attainment of Project Objectives

Under the No Project Alternative, there would be significantly fewer impacts in the areas of greenhouse gas emissions, land use and planning, transportation and traffic. The No Project Alternative would not add greenhouse gas emissions to the environment, would not require special use permits or amendments to the City's General Plan or zoning and would not contribute to transportation and traffic impacts because no vehicle trips would occur.

Impacts would be marginally fewer with the No Project Alternative in the areas of aesthetics, air quality, biological resources, geology and soils, noise, and utilities and service systems. Similar or the same impacts would occur with cultural resources, hazards and hazardous materials, and tribal cultural resources, because there would be no impacts in these areas with either this Alternative or the proposed Project.

The proposed Project is superior in the areas of hydrology and water quality and population and housing, because the Project would provide additional and/or updated drainage systems and enhanced water quality control and also provide funding for the City to expand its affordable housing programs to meet the needs of lower income families.

This Alternative would not meet the following goals and objectives:

- Comply with the City's General Plan – The proposed Project is part of a larger development called Napa Valley Commons corporate park. This area was envisioned in the General Plan for the type of development that currently exists. The No Project Alternative does not support the completion of the corporate park as intended and allows the currently vacant Project site to be underutilized in terms of consistency with the General Plan land use designation and intention.
- Provide a high quality mixed use project consistent with the intent of the City of Napa Zoning Code – The vacant Project site is designated and zoned for uses compatible with the corporate park, and the proposed Project meets the definitions for the proposed uses. The proposed Project supports the vision of the City for the build-out of the corporate park with uses that complement the vision and type of use intended. The No Project Alternative does not advance the intention of allowing the designated and permitted uses to be developed.
- Design a project consistent with the Napa Valley Commons Design Guidelines – The corporate park design envisions a fully utilized and developed industrial area with additional complimentary and consistent uses. The No Project Alternative would allow the 11.55-acre site to remain undeveloped and underutilized.

6.6 Project Alternative 2 – Reduced Intensity/Reduced Size Hotel

6.6.1 Description of Alternative

The Reduced Intensity/Reduced Size Hotel Alternative would change the proposed dual-brand hotel concept by eliminating the AC Hotel component, which proposes 153 units. Only the Residence Inn, consisting of 100 guest rooms, would be built. The other Project components, including the winery and the office building, would remain as identified in the proposed Project.

1. Aesthetics

The dual-hotel concept appears as one unified component covering approximately 99,076 square feet of the total 155,557 square feet encompassed by the AC Hotel and Residence Inn facilities. Aesthetically, the elimination of the building housing the AC Hotel would open a view corridor from Highway 221 into the corporate park, much as currently exists on the undeveloped site. Visually the proposed Project situates the two hotels to appear as an L-shape, providing massing relief by obscuring a portion of the building. No aesthetics impacts were identified in the DEIR analysis, because the hotel building, at four stories in height, is consistent with the maximum heights allowed by the General Plan/Zoning designations. This Alternative would provide a more open view from off-site, but would not reduce any aesthetics impacts, as none were identified. Therefore, the proposed Project and this Alternative are substantially the same.

2. Air Quality

The Reduced Intensity Alternative would result in marginally fewer air quality impacts, because the building housing 153 hotel units would not be constructed. Construction work on the hotel component was analyzed as ongoing during the entire 19-month construction schedule for the entire Project. Elimination of the AC Hotel would result in commensurate construction schedule reductions. Analysis in this DEIR shows that there are no projected air quality impacts during construction, and no local or state thresholds will be exceeded. However, the incremental reduction in air quality impacts is a benefit to air quality in the region generally and, therefore, this Alternative is marginally superior to the proposed Project.

3. Biological Resources

The Reduced Intensity Alternative would result in fewer impacts biologically due to the reduction in the building footprint for the hotel component. While no special status plant or animal species have been identified on the Project site, there is a potential for seasonal wetlands to occur in locations that parallel and are adjacent to Highway 221. The proposed Project includes ground disturbance of that area and the construction of parking lots and new landscaping. The Reduced Intensity Alternative may avoid the area, because the Project would have a commensurate reduction in the requirement for parking with the reduction in hotel rooms. While the proposed Project has been required to mitigate the impact due to the potential wetland disturbance, and impacts would be reduced to less than significant,

avoidance of wetlands is a preferred alternative of the resource agencies responsible for their protection. Mitigation for the proposed Project includes payment of fees to protect/enhance wetlands off-site. Therefore, the Reduced Intensity Alternative is superior to the proposed Project with regard to biological resources.

4. Cultural Resources

Impacts to cultural resources would be identical with either the Reduced Intensity Alternative or the proposed Project. The analysis herein, which is based on an Archaeological Inventory Survey prepared for the proposed Project, concludes that no cultural resources have been discovered in the Project area and it is unlikely that any will be discovered. The entire area has been previously graded and disturbed; however, mitigation has been provided for protection of such resources if discoveries occur during grading of the site. Therefore, impacts would be identical with either the proposed Project or the Reduced Intensity Alternative.

5. Geology and Soils

The Reduced Intensity Alternative would result in less grading potentially. The elimination of the AC Hotel building and the commensurate reduction in the need for parking spaces would require less disturbance of the ground for construction. However, other than the potential for soil erosion and runoff, no other impacts were identified in the Geotechnical Study Report. The report included recommendations for grading and building geotechnical concerns, which will be implemented with either the proposed Project or this Alternative. The recommendations and mitigation measures provided in the Geotechnical Report will reduce impacts to less than significant. Therefore, impacts will be substantially the same with either the proposed Project or the Reduced Intensity Alternative.

6. Greenhouse Gas Emissions

This Alternative would reduce the number of workers, the energy consumption, and the vehicle trips that contribute to GHG emissions, because there would be 153 fewer hotel rooms. With the proposed Project, long-term operational emissions will result in an exceedance of the BAAQMD threshold of 1,100 MTCO_{2e} per year by approximately 1,058 MTCO_{2e} per year without mitigation. The exceedance is due, in large measure, to mobile emissions and energy consumption for hotel workers and guests. Removal of 153 rooms from the Project is estimated to result in 1,127 unmitigated and 1,064 mitigated GHG emissions. Mitigated emissions would be below the BAAQMD threshold under this Alternative. In addition, Project emissions, combined with emissions from the adjacent developments of Napa Pipe and Meritage Commons, will contribute to an exceedance of BAAQMD standards on a cumulative basis. The cumulative operational impact will remain significant and unavoidable. The reduction of hotel rooms will make a significant contribution to the reduction in GHG emissions and, therefore, the Reduced Intensity Alternative is superior to the proposed Project.

7. Hazards and Hazardous Materials

The Phase I ESA prepared for the proposed Project did not recommend additional environmental studies for the site based on the findings that no known or suspected on-site conditions warrant regulatory involvement. No actions requiring environmental soil sampling, soil remediation, groundwater sampling, and/or groundwater remediation are required. No on-site RECs, off-site RECs, CRECs or HRECs with the potential to adversely impact the Project site were identified during the assessment. The Reduced Intensity Alternative would not introduce new or additional uses that could result in the use of or contamination by hazardous materials. Proximity to the Napa Airport would remain the same with no impacts from either the proposed Project or this Alternative. No impacts due to potential wildland fires were identified with the proposed Project, and this Alternative would not increase or lessen that potential. Therefore, no impacts would occur with either the proposed Project or the Reduced Intensity Alternative.

8. Hydrology and Water Quality

The original storm system within the Napa Valley Commons corporate park was designed for a commercial runoff coefficient and a 10-year storm event. Current city design standards require the proposed on-site piping system to convey the 25-year storm event while not impacting the existing infrastructure. Therefore, to meet the current City criteria the proposed on-site storm system will include an underground storage vault. This vault will be designed to detain the differential volume between the 25- and 10-year events and employ an outfall that will constrict the discharge to match the 10-year storm, thereby matching the maximum flow of the existing infrastructure piping within Napa Valley Corporate Drive. In addition, the Project proposes the use of permeable pavements to allow water to permeate the surface layer and pass into a porous base course and bedding materials and are underlain by a perforated pipe and storm water system. The reduction in the number of hotel rooms with this alternative would not alter the requirements for hydrology and water quality improvements associated with development on the Project site.

The industrial wastewater treatment for the winery includes a filtration process where solid and liquid elements of the wastewater will be separated. The solids will be dewatered and disposed of with normal trash, and remaining water will be filtered to a pure state through a reverse osmosis system. The resultant pure water will be stored in tanks in the wastewater treatment area and dispersed through the Project's landscape irrigation system, which will be directly connected to the pure water storage tanks. The proposed winery will not connect into the sewer system or use a hauling system, because all wastewater produced by the winery will be treated on-site. Domestic wastewater flows from the winery will be discharged to the Napa Sanitation District pipeline for treatment. No change to this component of the Project will occur with the reduction of the number of hotel rooms.

The Reduced Intensity Alternative would be required to comply with all the local and state regulations and requirements for hydrology and water quality facilities and the prevention of project related contaminants impacting local water sources. The DEIR analysis concluded that, with implementation of mitigation measures, including the construction of an underground storage vault for storm event detention, impacts would be less than significant.

Therefore, the proposed Project and this Alternative would be the same with regard to impacts to hydrology and water quality.

9. Land Use and Planning

This Alternative would be consistent with the City's General Plan and Zoning Code designations for uses in the corporate park. This alternative would require a Conditional Use Permit for a hotel in the Industrial Park (IP-A) zoning district, similar to the proposed Project. However, this Alternative would not require approval of a Planned Development Overlay to permit shared parking. The reduction of the number of hotel rooms would reduce the required parking for the Project, and adequate parking can be provided on-site to comply with the City's parking requirements.

As analyzed with the proposed Project, the General Plan identifies a maximum FAR for the proposed Project of 0.40. The proposed Project will have an FAR of 0.42. The General Plan and Zoning Code allow for combining and averaging of FAR for projects that encompass several buildings on several lots. The proposed Project is under the same ownership within the corporate park as The Meritage Resort and Meritage Commons. Averaging the three components results in a 0.38 FAR. The Reduced Intensity Alternative would not require the averaging, because a reduction of 153 hotel units would result in consistency with the maximum FAR allowance as a result of deducting the development square footage proposed for the AC Hotel.

Therefore, from the standpoint of Land Use and Planning, this Alternative is superior to the proposed Project by reducing the number of discretionary approvals required and being more consistent with the existing City requirements for FAR and parking.

10. Noise

This alternative would result in temporary construction and long-term operational impacts similar to the proposed Project. Adherence to the City's Municipal Code noise regulations would reduce impacts to less than significant for construction activities. Long-term operational noise related to traffic, hotel interior noise levels, and airport noise has been mitigated to a level of insignificance with the proposed Project. The potential reduction in construction noise with the elimination of the AC Hotel is a benefit with this alternative. Similarly, traffic noise will be incrementally less than with the proposed Project. However, with mitigation, neither this Alternative nor the proposed Project will result in noise impacts that are considered significant. No cumulative impacts were identified with the proposed Project. Therefore, noise impacts remain substantially the same with the Reduced Intensity Alternative and the proposed Project.

11. Population and Housing

This Alternative is the same as the proposed Project for impacts to population and housing. No housing is proposed with either scenario. However, both would be required to make an affordable housing fee payment to the City to offset housing costs for potential new low-income residents in the area who will be employed by the new development. Therefore, impacts would be the same under either this alternative or the proposed Project.

12. Public Services

This Alternative would require police, fire, and medical emergency services to serve the new development. A reduction in the number of hotel rooms would not have an appreciable lessening in the requirement for these services. The number of new residents that could potentially relocate to the City of Napa is too speculative to quantify for either this alternative or the proposed Project, but local schools have adequate capacity to include potential students. The proposed Project is required to pay the City's development fee towards new or updated police, fire, and medical emergency service facilities and personnel. The Reduced Intensity Alternative would have the same requirement. Therefore, impacts under this Alternative and the proposed Project are substantially similar.

13. Transportation and Traffic

The proposed Project will generate approximately 1,946 daily trips with build out of all components as described herein. The Reduced Intensity Alternative would reduce the number of trips commensurately with the elimination of the 153 hotel rooms proposed for the AC Hotel. The Traffic Study for the proposed Project shows that impacts under Existing Plus Project Conditions are considered significant without mitigation. Under Cumulative Conditions, the proposed Project will impact seven study intersections that would operate at unacceptable levels of service without mitigation. Mitigation measures contained in the DEIR reduce the proposed Project's impacts to a less than significant level.

The Reduced Density Alternative will result in fewer trips per day based on the reduction of hotel rooms. As detailed in the traffic analysis, the AC Hotel generates 1,252 daily trips based on the ITE land use code for a hotel. This is a considerable reduction in the total daily trips from what is anticipated for the proposed Project. Impacts to individual intersections could be significantly reduced, and fair share fees required by the City could be substantially reduced with this alternative. Therefore, the Reduced Density Alternative is superior to the proposed Project in the area of transportation and traffic.

14. Tribal Cultural Resources

The Reduced Density Alternative would require ground disturbance and construction similar to the proposed Project. According to the Northwest Information Center, no prehistoric or historic-era sites have been documented within the Project area surveyed. Likewise, no prehistoric or historic-era sites were identified during the pedestrian survey conducted for Project analysis by NDDS. Therefore, the proposed Project construction would not disturb or destroy any such resources, as none are known to exist on the Project site. The No Project Alternative and the proposed Project are identical, as neither would result in significant environmental impacts to tribal cultural resources.

15. Utilities and Service Systems

The Reduced Density Alternative would require the use of utilities and service systems similar to the proposed Project. Utilities and service systems are currently available to the Project site, as the site is within the developed Napa Valley Commons corporate park. New development has the ability to connect to existing water, sewer, electrical, gas, and cable

connections, and the provision of utilities was considered when the corporate park was built. Because the utilities have existing adequate capacity to accommodate the proposed Project's needs, no impacts would occur. There would be a reduction in the amount of water, gas, and electric required with this Alternative resulting in conservation of the resource. The Reduced Intensity Alternative is, therefore, marginally superior to the proposed Project.

6.6.2 Attainment of Project Objectives

Under this Alternative, impacts would be the same or similar in the areas of aesthetics, air quality, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, noise, population and housing, public services, tribal cultural resources, and utilities and service systems.

The Reduced Density Alternative is superior to the proposed Project with fewer impacts in the areas of biological resources, greenhouse gas emissions, land use and planning, transportation and traffic.

This Alternative is not feasible because it would not meet the Project objectives:

- Comply with the City's General Plan – The proposed Project is part of a larger development called Napa Valley Commons corporate park. This area was envisioned in the General Plan for the type of development that currently exists and was analyzed by the City. The Reduced Density Alternative does not support the completion of the corporate park as intended and allows the currently vacant Project site to be underutilized in terms of consistency with the General Plan land use designation and intention.
- Provide a high quality mixed-use project consistent with the intent of the City of Napa Zoning Code – The Reduced Density Alternative proposes construction of a studio style hotel in the Industrial Park (IP-A) zoning district. The corporate park also includes The Meritage Resort and Meritage Commons, which provide full-service resort-style accommodations. However, the proposed Project would provide two hotels styled and priced for families and business class guests, including a suites hotel and a single-room style hotel. The Reduced Density Alternative eliminates the single-room hotel, thereby reducing a hotel style choice that is more accessible to budget-conscious travelers.

6.7 Environmentally Superior Alternative

Per CEQA Guidelines §15126.6, a range of reasonable alternatives has been considered in this DEIR. The Alternatives were intended to reduce the significant impact of the proposed Project and to address concerns presented at the Scoping Meeting and in Notice of Preparation comment letters, CEQA does not require that an alternative meet all project objectives, rather, CEQA §15126.6(f) specifies that alternatives should “feasibly attain most of the basic objectives of the project.” In addition, CEQA Guidelines §15126.6(e)(2) requires that if the No Project Alternative is the environmentally superior alternative, the EIR shall also identify another environmentally superior alternative.

While the No Project Alternative would have fewer environmental impacts, most impacts have been mitigated to a less than significant level with Project implementation. Those impacts include greenhouse gas emissions, land use and planning, transportation and planning. Impacts would be marginally fewer in the areas of aesthetics, air quality, biological resources, geology and soils, noise and utilities and service systems. All other impact areas would be substantially the same.

As detailed above, the No Project Alternative does not meet most of the project objectives because it would not comply with the City's General Plan which envisioned the Napa Valley Commons corporate park as a fully built out development. The Project site, designated for industrial park uses, would be underutilized. The No Project Alternative would also fail to provide a high quality of mixed uses consistent with the intent of the City's Zoning Code. The site is zoned for uses compatible with the corporate park and this alternative would not advance the intent of allowing designated uses to be developed. In addition, the Napa Valley Commons Design Guidelines envision a fully utilized industrial area which would not result if no project were developed.

The remaining project alternative presented herein, the Reduced Intensity/Reduced Size Hotel, would reduce Project impacts in the areas of biological resources, greenhouse gas emissions, land use and planning and transportation and traffic. Impacts would be similar in the areas of aesthetics, air quality, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, noise, population and housing, public services, tribal cultural resources and utilities and service systems.

This Alternative would not comply with the City's General Plan by not supporting the completion of the corporate park as envisioned. Consistency with the City's Zoning Code would not be achieved because the Project would not be built to the full extent allowed by providing a high quality mixed-use project. This alternative would reduce a hotel style choice that would impact budget-conscious travelers with fewer rooms available at moderate prices. However, for purposes of this analysis, Alternative 2 – Reduced Intensity/Reduced Size Hotel would meet several of the Project objectives and substantially reduce the significant impact in the area of greenhouse gas emissions and traffic. All remaining impacts under this Alternative would be less than significant with mitigation. Therefore, Alternative 2 is considered the environmentally superior alternative.

7. Summary of Cumulative Impacts

CEQA requires the consideration of cumulative impacts. Defined, these impacts are “two or more individual effects, which when considered together, are considerable or which compound or increase other environmental impacts” (CEQA Guidelines §15355). Where the Project will create an impact to the existing residential developments, such impacts are noted in Chapter 5 of the DEIR. In addition to assessment of impacts on the environment, including the existing built environment, this section analyzes whether the Project will result in incremental effects that, when combined with other past, present and probable future projects, are cumulatively considerable.

The proposed Project is located in the City of Napa within an established industrial/corporate park. The Kaiser Data Center is northerly of the site across a vacant parcel. The immediate surrounding area is largely built-out with low-rise office and industrial development. An existing hotel and planned hotel are located on Bordeaux Way. Vineyards are located easterly of the Project site across SR 221. A planned redevelopment project known as Napa Pipe is located westerly of the site within the County of Napa and the City’s sphere of influence. The Napa County Airport and the Airport Industrial Park are located approximately 4 miles to the south.

The DEIR analyzed approved and anticipated development projects within the general vicinity in terms of impacts that could be cumulative when added to the proposed Project. The existing commercial developments and related projects identified herein were taken into consideration to assess impacts as discussed in each topical section below. Chapter 5 of the DEIR contains additional analysis of cumulative impacts for each topical environmental section. Specifically, the existing built environment was used to accurately describe the existing setting without the proposed Project and was contemplated to determine whether the proposed Project, when combined with other past, present and reasonably foreseeable future projects, would result in cumulatively considerable impacts. Cumulative impact conclusions are based on two key criteria:

1. Level of project-specific impact. When an analysis concludes a project’s impacts are individually minor but “cumulatively considerable,” the project may have a significant impact on the environment.
2. Consideration of non-existing conditions and other cumulative projects. If there is a serious existing problem such that any additional amount of impact, when compared to the pre-existing conditions, would be significant, any additional amount of project impact would contribute to a cumulative impact.

The table below identifies each environmental topic and discusses cumulative impacts related to each.

Table 7-1 Cumulative Impacts Summary

Environmental Issue/Topic	Project Specific Impact	Conclusion Regarding Cumulative Impacts
Aesthetics	Construction of a hotel, winery and office building will create visual impacts due to the currently undeveloped condition of the site and new sources of light will be introduced to the site. Standard Mitigation Measures have been included herein to reduce potential impacts to a less than significant level. No special mitigation measures are required.	Views of the site will be similar to other development within the corporate park setting where the Project is located. No scenic views, vistas or resources will be impacted because the Project is not within a scenic view corridor or state scenic highway. Therefore, the Project will not result in a cumulative impact to aesthetics within the community.
Air Quality	The Project could contribute incrementally to two projects within the immediate vicinity of the Project. They include the Napa Pipe project and the Meritage Commons project. Both projects have been analyzed for impacts to air quality and mitigation has been included to reduce impacts. The proposed Project's contribution alone will be minimal because both short-term construction and long-term operational impacts are below BAAQMD thresholds.	The proposed Project has been determined to have less than significant impacts to air quality. The Napa Pipe project has been determined to have emissions exceeding local standards. However, as noted, the Project will result in a minimal contribution cumulatively to air quality impacts because impacts are below BAAQMD thresholds and mitigation will further reduce potential cumulative impacts to a level of insignificance.
Biological Resources	The proposed Project does not have the potential for cumulative impacts associated with special-status vegetation communities or special-status species. Potential cumulative impacts due to the Project could occur to isolated wetlands. Mitigation has been included requiring the purchase of mitigation bank credits which will result in less than significant impacts.	Any impacts to wetlands will be contained on the Project site and not contribute to off-site wetland area impacts. The potential wetlands are considered isolated; therefore, no downstream or adjacent cumulative impacts will occur. No other significant impacts to biological resources have been identified that cannot be substantially lessened with the implementation of the proposed mitigation measures.
Cultural Resources	Development of the proposed Project is not anticipated to significantly impact cultural resources within or adjacent to the Project boundaries. A significant amount of the Project site has been graded and contains a variety of shrubs, grasses and trees. No cultural resources have been identified on the Project site or within the adjacent area. Individual Project impacts from foreseeable projects in the vicinity are evaluated and mitigated on a project-by-project basis.	Project development in combination with other cumulative projects would not significantly alter any regional or cumulative cultural, scientific or historic resources. No known archaeological or paleontological resources have been found on the Project site. No cumulative impacts to cultural resources will occur.
Geology and Soils	Soils and geology impacts are site specific and the Project is not in close proximity to projects identified as having the potential for cumulative impacts. The site is not within an area with a high potential for landslides or liquefaction. Erosion will be controlled via mitigation. Mitigation has been included to prevent significant impacts due to construction activities and all other potential geologic impacts are reduced through mitigation and recommendations in the Geotechnical Report.	The Project, as proposed, will not result in a cumulatively considerable impact when combined with other proposed projects in the vicinity. There will be no significant cumulative impacts due to the implementation of the Project as proposed.
Greenhouse Gas Emissions	The primary source of the temporary GHG emissions generated by construction activities is from use of diesel-powered construction equipment.	Long-term operational conditions will result in GHG threshold exceedance. Therefore, the Project will contribute cumulatively to GHG

Environmental Issue/Topic	Project Specific Impact	Conclusion Regarding Cumulative Impacts
	<p>The Project will include site preparation, grading, construction of the hotel, winery and office buildings, paving and painting. No construction emissions exceed thresholds. The primary sources of GHG emissions generated by the operational phase of the Project include day-to-day operation and maintenance, use of consumer products, natural gas use, and vehicle trips associated with employees, visitors and hotel guests. GHG operational emissions will exceed the BAAQMD threshold of 1,100 MTCO_{2e} by 1,058 MTCO_{2e}.</p>	<p>emissions when combined with the cumulative projects identified herein. Mitigation has been included to reduce GHG emissions; however, the mitigated emissions will still exceed the adopted thresholds and the impact will remain cumulatively significant and unavoidable.</p>
<p>Hazards and Hazardous Materials</p>	<p>The proposed Project, when combined with other projects in the vicinity, will not result in significant cumulative impacts related to hazards and hazardous materials. Individually, all hazards and hazardous materials impacts due to Project implementation are less than significant with mitigation.</p>	<p>Because no known or suspected hazards exist on the Project site, and no uses will be conducted on the site that will include hazardous materials, there will be no cumulative impacts due to Project implementation.</p>
<p>Hydrology and Water Quality</p>	<p>Cumulative development in the Project area could result in alterations to the drainage pattern and flow rates in the Project vicinity. Impacts will be mitigated on a project-by-project basis by construction of project-specific drainage improvements. Storm drain improvements for the proposed Project and other projects in the area will be designed to provide projected levels required by the City.</p>	<p>The proposed Project will not generate a substantial increase in runoff from the Project site thereby contributing to a cumulative increase. The additional proposed projects within the Project vicinity are adequately separated distance-wise to prevent cumulative impacts due to erosion, water runoff and water quality. The Project includes an underground storage vault to detain the differential volume of storm water runoff. Therefore, the proposed Project, when considered with other potential projects, will not result in significant cumulative impacts.</p>
<p>Land Use and Planning</p>	<p>Additional projects proposed in the Project vicinity will add 2,580 residences, approximately 40,000 square feet of retail/restaurant, 50,000 square feet of office, 15,000 square feet of commercial, 140,000 square feet of industrial and 150 hotel suites. As these proposed uses are also consistent with local regulations, there will be no cumulative impacts with the addition of the proposed Project.</p>	<p>The proposed Project is consistent with applicable general plan goals and policies and zoning regulations. The City's General Plan envisioned the buildout of the Napa Valley Commons corporate park with uses as proposed by the Project. There will be no cumulative impacts related to land use and planning.</p>
<p>Noise</p>	<p>The proposed Project is located south of the Napa Pipe project and east of the Meritage Commons project. Locationally, all are separated by adequate distance. Individual on-site operational noise impacts have been analyzed and mitigation has been provided. Traffic generated by each project will contribute to the ambient noise levels generally.</p>	<p>The cumulative projects will not be built concurrently and construction noise from each project will not result in a cumulative exceedance of noise thresholds. Operational noise from each project will not contribute to a cumulatively significant impact due to distance. Therefore, cumulative impacts will be less than significant.</p>
<p>Population and Housing</p>	<p>The proposed Project does not include construction of housing. Population increases will be due to employees relocating to Napa to fill news jobs resulting from Project implementation. The Napa Pipe project will result in 2,580 new residences and</p>	<p>The proposed Project has the potential to increase the population and need for housing in the City of Napa through the relocation of potential employees. Mitigation includes the payment of fees to fund housing programs to assist lower income residents. With mitigation,</p>

Environmental Issue/Topic	Project Specific Impact	Conclusion Regarding Cumulative Impacts
	mitigation will be implemented to reduce impacts. The Meritage Commons project does not propose housing as the project is a resort hotel.	there will be no cumulative impacts due to the proposed Project.
Public Services	The proposed Project, along with the Napa Pipe and Meritage Commons projects, will be required to provide fees for new and/or expanded services. The proposed Project will have minimal impacts on public services.	The proposed Project, Napa Pipe and Meritage Commons have been required to provide fees for new or expanded services as required by the individual projects. With mitigation, cumulative impacts will be less than significant.
Transportation and Traffic	The DEIR identified two projects in the vicinity of the proposed Project that, when taken together, could potentially result in a cumulatively significant impact. Each project will generate new traffic which was added to the opening year volumes to determine if the cumulative projects will add to traffic congestion and create an impact.	Analysis shows that the proposed Project, in combination with the two cumulative projects, will result in traffic impacts. Implementation of planned and fully funded roadway improvements, plus additional mitigation identified for each individual project, will result in less than significant cumulative impacts.
Tribal Cultural Resources	The proposed Project site does not contain any known tribal cultural resources. Impacts for cumulative projects will be confined to on-site presence of such resources with site-specific mitigation.	Individual project impacts are evaluated and mitigated on a project-by-project basis. The Project will not contribute cumulatively to an impact to tribal cultural resources and there will be no impact due to Project implementation.
Utilities and Service Systems	Gas and electric service are available throughout the corporate park. Napa Pipe and Meritage Commons have been analyzed for impacts and to ensure that adequate capacity exists to serve the projects. Future developments will be required to secure service on a project-by-project basis for utilities and service systems.	Cumulative impacts will result in an increase in the demand for utility and service systems for new development in the area. Mitigation has been included in the proposed Project, Napa Pipe and Meritage Commons to ensure adequate coordination and provision of services and to ensure cumulative impacts will be less than significant.

8. Growth Inducing Impacts

CEQA requires the consideration of growth-inducing impacts resulting from new development. Pursuant to CEQA Guidelines §15126.2(d), such impacts are ways in which the proposed Project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included are projects that would remove obstacles to growth. In addition, growth-inducing impacts could be realized if the Project would encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively.

Potential growth-inducing impacts have been discussed throughout this DEIR, but are brought to focus in this section. The proposed Project site is within the setting of an existing corporate park and the site is currently vacant. The proposed uses, which include a hotel, office and winery, will potentially provide employment for between 238 and 329 worker households based on the uses proposed and as analyzed in the Review of Housing Impacts report. However, it is anticipated that the actual number of employees will be approximately 190. New employment for the Project will range from hotel and grounds maintenance to typical management level jobs in the hotel, winery and office building. While the Project could draw from people currently residing in the Napa area, the potential exists for workers to relocate to Napa if they are employed as part of the Project workforce. The Census Bureau's American Community Survey shows that the average number of workers per working household in the City of Napa is 1.43.

The Review of Housing Impacts report prepared for the Project, which is fully discussed and analyzed in Section 5.11 – Population and Housing – notes that regional wages in the Napa area exceed national averages across nearly all occupation categories. This factor could be an incentive to people outside the region to seek both employment and housing due to Project development. However, housing costs in the area are high and there is a limited supply of housing affordable for very low and low-income workers.

The City of Napa Zoning Code (Chapter 15.94) requires new development to provide a fee towards the provision of housing and programs that will enable low income families to locate in the area closer to their place of employment. The proposed Project does not include construction of new housing. The estimated fee for the proposed Project is \$1,131,158 and mitigation has been included herein to require payment of the fee prior to issuance of building permits.

The Project Traffic Analysis concluded that with mitigation, all traffic related impacts would be reduced to less than significant. Mitigation includes payment of fair share fees towards improvements at specific intersections, some of which are currently operating at inadequate levels of service even without the addition of Project-related traffic. The proposed fees will result in the implementation of operational improvements at the impacted intersections.

The business park infrastructure was designed to accommodate a fully operational built-out condition and no additional facilities are required to support the proposed Project.

Coordination with service providers to identify the location of all underground connections to existing utilities is required through mitigation herein. The proposed on-site utility improvements will not foster population growth beyond the Project and no infrastructure improvements will be extended into adjacent areas outside of the Project boundaries.

Because the Project is consistent with the City's land use designations and buildout vision for the business park, potential impacts were identified and analyzed in the General Plan. Consistency with the General Plan will not result in growth inducing impacts beyond what was analyzed.

The proposed Project will result in additional job demand within the greater Napa job market area for land uses within Napa Valley Corporate Park envisioned by the City of Napa General Plan. As noted, the availability of jobs could induce a certain percentage of potential employees to relocate to the City of Napa to fill the anticipated jobs for the hotel(s), winery and office. The mitigation fee discussed herein will provide resources to assist lower income households to find affordable housing. No additional growth-inducing impacts will occur. The City envisioned a fully operational business park, including the Project site, which is currently vacant and underutilized.

9. Inventory of Mitigation Measures

9.1 Aesthetics

MM AE-1	Low-level lighting shall be utilized in any parking area(s) as opposed to elevated high-level intensity light standards.
MM AE-2	All new utilities shall be placed underground.
MM AE-3	The developer shall comply with the following: <ol style="list-style-type: none">The plans submitted for the Project improvements or building permit, whichever comes first, shall include a final landscape and irrigation plan designed and signed by a licensed landscape architect or landscape contractor. The final landscape plans shall specify that 1) all plant materials be certified by the Napa County Agricultural Commissioner inspection program for freedom from the glassy winged sharpshooter or other pests identified by the Agricultural Commissioner and 2) the Agricultural Commissioner's Office shall be notified of all impending deliveries of live plants with points of origin outside of Napa County so that inspection can be arranged. No improvement plans shall be approved nor building permit issued until the Planning Department approves the landscape and irrigation plan. Prior to occupancy, the licensed professional who signed the final landscape and irrigation plan shall certify in writing to the Planning Director that he/she has inspected and approved the installation of landscaping and irrigation and has found them to be consistent with the approved plans including, but not limited to, the certifications and inspections by the Agricultural Commissioner as well as that the systems are in working order. A substitution of an alternate licensed professional may be allowed by the Planning Director upon a showing of good cause.Prior to occupancy, Developer shall execute and record the City's Landscape Maintenance Agreement. (Forms are available from the Planning Department.)
MM AE-4	The Developer shall secure separate architectural review approval for any signage for the Project.

9.2 Air Quality

MM AQ-1	During project construction, the applicant shall ensure that best management practices for dust control as set forth in the BAAQMD CEQA Air Quality Guidelines are implemented. These include:
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1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
2. All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
3. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
4. All vehicle speeds on unpaved roads shall be limited to 15 miles per hour (mph).
5. All roadways, driveways and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
6. Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
7. All construction equipment shall be maintained and properly tuned in accordance with manufacturer’s specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
8. Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District’s phone number shall also be visible to ensure compliance with applicable regulations.

9.3 Biological Resources

MM Bio-1	Prior to issuance of grading permits, the Project Applicant shall provide a tree risk assessment for the three valley oaks proposed to be preserved in place to determine their health and stability. Recommendations in the tree risk assessment shall be enforced to protect trees determined healthy enough for preservation.
MM Bio-2	Prior to issuance of grading permits the Applicant shall submit to the City grading/site preparation plans that reflect that the roots of the oak trees to be protected are severed around the entire perimeter of the tree protection zones to ensure subsequent construction can proceed outside the tree protection zone without further impacting the trees.
MM Bio-3	Prior to issuance of building permits, the Applicant shall ensure that the construction documents depict that Silva Cells are to be installed in three locations beneath the new hardscape areas to provide a dedicated zone for

	<p>oak tree root growth, consistent with the locations identified on the Silva Cell Location Diagram on page 5.3-45 herein.</p>
MM Bio-4	<p>Prior to issuance of a grading permit, the Applicant shall ensure that the grading plans and relevant construction documents incorporate the Tree Protection and Maintenance Guidelines set forth in the Arborist's report, included on pages 15 through 30 of Appendix F.</p>
MM Bio-5	<p>Prior to issuance of a grading permit, the Applicant shall ensure that vegetation clearing outside of the nesting season (February 1 through August 31) for all vegetation alliances or land-cover types on the site is conducted. If vegetation clearing is not feasible outside of the nesting season, the Project Applicant shall submit a nesting bird survey, prepared by a qualified biologist, within three days prior to any disturbance of the site, including disking, demolition activities and grading. If active nests are identified, the biologist shall establish suitable buffers around the nests consisting of as much as 500 feet for raptors and 300 feet for non-raptors, and the buffer areas shall be avoided until the nests are no longer occupied and the juvenile birds can survive independently from the nests.</p>
MM Bio-6	<p>Prior to issuance of a grading permit, the Applicant shall ensure that dry-season and wet-season protocol surveys are completed to determine whether the potential seasonal wetland features observed on the site support listed fairy shrimp, including the vernal pool fairy shrimp.</p>
MM Bio-7	<p>Prior to the issuance of grading permit, the Applicant shall provide to the City or its biologist for review, the fairy shrimp protocol surveys to determine presence or absence of fairy shrimp. If listed fairy shrimp are detected within any of the potential seasonal wetland features, impacts to occupied habitat shall be mitigated at a 2:1 ratio. Fee payment shall be made through an approved mitigation bank that covers the vernal pool fairy shrimp. The mitigation bank shall be located within the service area that covers the Project site. Alternate mitigation may be approved by USFWS, to the satisfaction of the City of Napa.</p>
MM Bio-8	<p>Prior to issuance of a grading permit, the Applicant shall ensure the completion of a formal wetland determination demonstrating whether or not the potential seasonal wetlands features meet the minimum threshold for wetlands. If the wetland determination does not meet the minimum threshold for wetlands no additional mitigation would be required. If the wetland determination meets the minimum threshold for wetlands, the Applicant shall be required to mitigate at a 2:1 ratio for any freshwater wetlands dominated by pale spikerush. The mitigation may be satisfied through purchase of credits in an approved mitigation bank with a service area that covers the Project site, or in an acceptable manner to the City, so long as the 2:1 ratio is met.</p>

9.4 Cultural Resources

MM CR-1	During site preparation and grading activities, the Project applicant shall ensure that, if any archaeological materials or objects are unearthed during Project construction, all work in the vicinity shall be immediately halted until a qualified archaeologist is retained by the City to evaluate the finds. The Project applicant shall comply with all mitigation recommendations of the archaeologist prior to commencing work in the vicinity of the archaeological finds.
MM CR-2	During the construction phase, the Project applicant shall ensure that if any human remains are uncovered, work shall be halted within the immediate vicinity of the discovery and state law shall be followed, which includes immediately contacting the County Coroner's office and a representative of the Yocha Dehe Wintun Nation.
MM CR-3	During the construction phase, the Project applicant ensure that if any unidentified cultural materials are encountered on or below the surface, archaeological consultation should be sought immediately.

9.5 Geology and Soils

MM Geo-1	All Project-related grading, trenching, backfilling and compaction operations shall be conducted in accordance with the City of Napa Public Works Department Standard Specifications.
MM Geo-2	All construction activities shall meet the Uniform Building Code regulations for seismic safety (e.g., reinforcing perimeter and/or load bearing walls, bracing parapets).
MM Geo-3	Developer shall provide an erosion and sediment control plan and a schedule for implementation of approved measures to the Public Works Director for approval prior to the issuance of any grading permits. No grading and excavation shall be performed except in accordance with the approved plan and schedule.
MM Geo-4	Hydroseeding of all disturbed slopes shall be completed by October 1. Developer shall provide sufficient maintenance and irrigation of the slopes such that growth is established by November 1.
MM Geo-5	Prior to the issuance of building permits and grading permits, the City of Napa shall ensure the grading and building plans demonstrate compliance with the recommendations included in the Geotechnical Study Report by RGH consultants dated July 13, 2015 related to seismic design criteria for structures, grading, foundation support, retaining walls, slab-on-grade, utility trenches, pavements, drainage and maintenance.

MM Geo-6	Prior to issuance of grading permits, the Applicant shall have prepared a haul route plan showing the construction materials haul routes, the number of trips per day, and the location where grading export materials will be taken.
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9.6 Greenhouse Gas Emissions

MM GHG-1	<p>Prior to the issuance of building permits, the City shall ensure that building plans reflect the following measures are to be implemented in the areas of Transportation, Energy-Efficiency, Water and Waste Consumption Measures to Reduce Project GHG Emissions.</p> <ol style="list-style-type: none">1. Designate at least 53 clean air vehicle (i.e., electric vehicle) parking spaces;2. Ensure that all winery-related wastewater is treated on-site and instate a program to reduce indoor and outdoor water use by at least 20%;3. Instate a program to ensure that 2013 Title 24 energy standards (used by the CalEEMod model) for energy use and lighting are exceeded by at least 20%. Adherence to CalGreen 2016 Title 24 energy standards and other measures would be necessary including, but not limited to:<ol style="list-style-type: none">a. Sensors shall be installed in all rooms that detect if a guest is in the room and activate the HVAC.b. A separate system requires the guest room key to be inserted in order for the lights to work in the hotel rooms.c. LED lights installed throughoutd. All new appliances would be energy efficiency rated for the hotel;4. Planting of at least 430 new trees on-site;5. Instate a shuttle program which would reduce project trip generation by at least 180 trips per day;6. Instate a recycling and compost program that would divert at least 20% of waste created on-site.
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9.7 Hydrology and Water Quality

MM H/WQ-1	To ensure adequate drainage control, the Developer of any project that introduces new impervious surfaces (roof, driveways, patios) that will change the rate of absorption of drainage or surface run-off shall submit a drainage and grading plan designed in accordance with Policy Resolution No. 17 and the City of Napa Public Works Department Standard Specifications to the Public Works Department for its approval.
MM H/WQ-2	For any construction activity that results in the disturbance of 5 acres or greater total land area, or that is part of a larger common plan of development that disturbs 5 acres or greater total land area, Developer shall file a Notice of Intent with the California Regional Water Quality Control

	<p>Board (SWRCB) prior to any grading or construction activity. In the event construction activity for the Project occurs after the SWRCB has changed its General Permit for construction activity to cover disturbance(s) of 1 acre or more, this measure shall apply to any construction activity for this Project which results in the disturbance of 1 acre or greater total/and area, or is part of a larger common plan of development that disturbs 1 acre or greater total land area.</p>
MM H/WQ-3	<p>The Developer shall ensure that no construction materials (e.g., cleaning fresh concrete from equipment) are conveyed into the storm drain system. The Developer shall pay for any required cleanup, testing and City administrative costs resulting from consequence of construction materials into the storm water drainage system.</p>
MM H/WQ-4	<p>All materials that could cause water pollution (e.g., motor oil, fuels, paints) shall be stored and used in a manner that will not cause any pollution. All discarded material and any accidental spills shall be removed and disposed of at an approved disposal site.</p>
MM H/WQ-5	<p>All construction activities shall be performed in a manner that minimizes, to the maximum extent practicable, any pollutants entering directly or indirectly the storm water system or ground water. The Developer shall pay for any required cleanup, testing and City administrative costs resulting from consequence of construction materials into the storm water drainage system.</p>
MM H/WQ-6	<p>Developer shall meet the requirements of discharging to a public storm drainage system as required to ensure compliance by the City with all state and federal laws and regulations related to storm water as stipulated in the Clean Water Act. Developer shall meet the requirements of the National Pollutant Discharge Elimination System (NPDES) permit in effect prior to completion of Project construction for storm water discharges from the municipal storm water system operated by the City of Napa. Developer shall comply with the Storm Water Pollution Mitigation Plan (SWPMP) submitted by Developer as part of its application as (modified and) approved by the Director of Public Works.</p>
MM H/WQ-7	<p>Developer shall mark all new storm drain inlets with permanent markings, which state “No Dumping-Flows to River.” This work shall be shown on improvement plans.</p>
MM H/WQ-8	<p>Developer shall record a plan for long-term private maintenance acceptable to the Director of Public Works and the City Attorney for any structural storm water pollution removal devices or treatment control BMP incorporated as part of the Project. The plan shall comply with City and SWRCB requirements including, but not limited to, a detailed description of responsible parties, inspections, maintenance procedures for the detention system, including monitoring and documentation of annual report to the Public Works Department and procedures for enforcement. Appropriate easements or other arrangements satisfactory to the Public Works Director and City Attorney necessary or convenient to ensure the feasibility of the scheme and</p>

	fulfillment of maintenance responsibilities shall be secured and recorded prior to approval of the final/parcel map or issuance of a building permit, whichever comes first.
MM H/WQ-9	Prior to the issuance of grading permits, the Project Applicant shall demonstrate compliance under California’s General Permit for Storm Water Discharges Associated with Construction Activity. The Project Applicant shall prepare and submit to the City a Storm Water Pollution Prevention Plan that describes erosion and sediment control BMPs and BMPs that will be used during the construction of the Project.
MM H/WQ-10	Prior to issuance of building permits, the City of Napa shall ensure the building plans demonstrate that properly designed and sized LID features have been incorporated into the Project.

9.8 Land Use and Planning

MM LU-1	Developer shall comply with all requirements of federal, state and local laws and regulations applicable to Project construction and issuance of building permits.
MM LU-2	Developer shall comply with the monitoring/reporting checklists for development pursuant to the City of Napa Resolution 96-153 regarding CEQA implementation procedures for both standard and Project specific mitigation measures.
MM LU-3	Developer shall notify all employees and agents of the mitigation measures and conditions applicable to the Project and shall ensure compliance with such measures and conditions. Developer shall also notify all assigns and transferees of the same.
MM LU-4	Prior to issuance of building permits, the Project Applicant shall provide evidence to the City of a deed restriction identifying the combined square footage for The Meritage Resort, Meritage Commons, and the Trinitas Mixed Use Project and the resultant averaging of FAR as permitted to maintain consistency with the General Plan FAR allowance. The deed restriction shall restrict the “donor” parcels (The Meritage Resort and Meritage Commons) to a maximum of 689,316 square feet consistent with the combined average in order to prevent overbuilding of square footage on those parcels.
MM LU-5	Prior to issuance of building permits, the Project Applicant shall memorialize a shared parking agreement per a Planned Development Overlay to allow a total of 441 shared parking spaces for use between the hotel and winery. The shared parking agreement shall provide three parking spaces for evening use of the hotel. The shared parking agreement shall be in full force and effect throughout the life of the project and will be binding upon any future owners of the property.

9.9 Noise

MM N-1	During the construction phase, the Project Applicant shall ensure that all construction activities shall comply with all requirements in Section 8.08.025 of the Napa Municipal Code, including limiting hours of construction to 7:00 a.m. to 7:00 p.m. Monday through Friday on weekdays and 8:00 a.m. to 4:00 p.m. on weekends or legal holidays unless a permit shall first have been secured from the City Manager.
MM N-2	Prior to issuance of building permits, Project Applicant shall ensure that mechanical equipment associated with the winery component of the Project shall be selected and designed to reduce impacts on surrounding uses to meet the City's General Plan noise level thresholds for industrial land uses. A qualified acoustical consultant shall be retained to review mechanical noise as these systems are selected to determine specific noise reduction measures necessary to reduce noise to comply with the noise performance standard. Noise reduction measures could include but are not limited to, selection of equipment that emits low noise levels and installation of noise barriers such as enclosures to block the line of sight between the noise source and the nearest receptors.
MM N-3	Prior to commencement of construction activities, Project Applicant shall notify adjacent building occupants of scheduled construction activities and schedule such activities during hours with the least potential to affect nearby occupants to the extent feasible.
MM N-4	During special events, the Project Applicant shall ensure all public address or sound amplification systems are operated consistent with the provisions of Sections 17.52.310 and Section 8.08.010 of the Municipal Code including the conditions of the Project use permit.

9.10 Population and Housing

MM P/H-1	Prior to the issuance of a building permit, Applicant shall pay the City the affordable housing impact fee as calculated by the Chief Building Official and based on the methodology identified by the City Council for non-residential development.
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9.11 Public Services

MM PS-1	Developer shall pay the required fire and paramedic fees for new development in accordance with Napa Municipal Code Chapter 15.78. The fee for each unit of development within a development project shall be paid in full prior to the issuance of the building permit required for that unit of
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	<p>development. Such fees shall be payable at the rate in effect at the time of payment for the unit involved. The findings set forth in the ordinance and Resolution 94-106 are incorporated herein. The City further finds that calculation of the fee pursuant to the formula set forth therein demonstrates that there is a reasonable relationship between the fees imposed and the cost of improvements attributable to this Project.</p>
MM PS-2	<p>Developer shall comply with all applicable requirements of the Uniform Fire Code, the Fire Department and PWD Standard Specifications and the Fire Department “Standard Requirements for Commercial/Residential Projects,” including, without limitation, the requirements for access, new construction, smoke detectors, fire extinguishers, and fire hydrants. Existing fire hydrants may be used to meet hydrant location requirements only if they meet or are changed to meet current hydrant specifications.</p>
MM PS-3	<p>All newly constructed buildings must have automatic sprinkler systems conforming to NFPA and City Standard Specifications, for which installation permit must be obtained from Fire Prevention. In multi-building complexes, or in buildings with three or more stories, special monitoring conditions will be required. Existing habitable buildings, which are retained, shall be retrofitted.</p>
MM PS-4	<p>The Developer of any project which proposes commercial occupancies shall secure approval from Fire Prevention and Building Departments prior to signing lease agreements and allowing occupancy of prospective occupants that pose possible fire and life safety hazards, or are classified by the Uniform Building Code as an H (hazardous) occupancy.</p>

9.12 Transportation and Traffic

MM T-1	<p>All required public frontage and street improvements shall be designed and built in accordance with City of Napa ordinances and the PWD Standard Specifications. Unless waived by the Public Works Director, street improvements shall include curbs, gutter, sidewalk, planting, streetlights, and street trees. Any additional right-of-way necessary to accommodate these improvements shall be dedicated to the City.</p>
MM T-2	<p>During non-working hours, open trenches shall be provided with appropriate signage, flashers and barricades approved by the Street Superintendent to warn oncoming motorists, bicyclists and pedestrians of potential safety hazards.</p>
MM T-3	<p>All road surfaces shall be restored to pre-Project conditions after completion of any Project-related pipeline installation activities.</p>
MM T-4	<p>To mitigate the cumulative impact of the traffic generated by the subject Project on the City’s arterial and collective street system, the Developer shall pay a Street Improvement Fee in accordance with Napa Municipal Code Chapter 15.84 and implementing resolutions to pay for the traffic</p>

	<p>improvements identified therein. Such fee shall be payable at the rate in effect at the time of payment. The findings set forth in the ordinance and implementing resolutions are incorporated herein. The City further finds that the calculation of the fees in accordance with the trip generation capacity of development demonstrates there is a reasonable relationship between the amount of the fees imposed and the cost of the street improvements attributable to this Project.</p>
MM T-6	<p>Prior to issuance of Certificates of Occupancy, the Project Applicant shall pay a 3.43% fair share contribution to the following improvement: provide additional northbound and southbound through lanes and optimization of signal timing at the intersection of SR 221/Napa Valley Corporate Way.</p>
MM T-7	<p>Prior to issuance of Certificates of Occupancy, the Project Applicant shall pay a 2.12% fair share contribution to the following improvement: replace the existing signal by constructing a fully grade-separated interchange or roundabout at the intersection of SR 12-SR 29/SR 221.</p>
MM T-8	<p>Prior to issuance of Certificates of Occupancy, the Project Applicant shall pay an 11.20% fair share contribution to the following improvement: restripe westbound approach to one left-turn lane, one shared through/left-turn lane, and one right-turn lane at the intersection of Napa Valley Corporate Drive/Napa Valley Corporate Way.</p>
MM T-9	<p>Prior to issuance of Certificates of Occupancy, the Project Applicant shall pay 100% of the cost of the following cumulative impact improvement: installation of a traffic signal or a roundabout at the intersection of Napa Valley Corporate Way/Bordeaux Way.</p>
MM T-10	<p>Prior to issuance of Certificates of Occupancy, the Project Applicant shall pay a 2.09% fair share contribution to the following improvement: provide an additional through lane in the northbound and southbound direction and optimization of signal timing at the intersection of SR 221/Streblow Drive.</p>
MM T-11	<p>Prior to issuance of Certificates of Occupancy, the Project Applicant shall pay a 1.73% fair share contribution to the following improvement: provide an additional through lane in the northbound and southbound and optimization of signal timing at the intersection of SR 221/Magnolia Drive.</p>
MM T-12	<p>Prior to issuance of Certificates of Occupancy, at the intersection of Soscol Avenue (SR 221)/Imola Avenue (SR 121) under Existing plus Project conditions, the Project Applicant shall pay a 1.39% fair share contribution to the following improvement: optimization of signal timing. Under Cumulative Plus Project conditions, the Project Applicant shall pay a 1.68% fair share contribution for an additional through lane in the northbound and southbound direction and signal timing optimization.</p>

9.13 Utilities and Service Systems

MM U-1	Prior to trenching within existing roadway areas, the Developer’s engineer shall ascertain the location of all underground utility systems and shall design any proposed subsurface utility extensions to avoid disrupting the services of such systems.
MM U-2	Water and energy conservation measures shall be incorporated into Project design and construction in accordance with applicable codes and ordinances.
MM U-3	The Project shall be connected to the Napa Sanitation District for sanitary sewer service. If the subject property is currently served by individual sewage disposal systems, the septic systems, setbacks and reserve areas must be protected and maintained during cleaning, grading, construction and after connection to the District, the existing septic tank(s) shall be properly destroyed.
MM U-4	The Project shall be connected to the City of Napa water system. Any existing well must be properly protected from potential contamination. If an existing well is to be destroyed, a well-destruction permit must be obtained from the Napa County Department of Environmental Management by a licensed well driller. If an existing well is not destroyed, it must be properly protected and an approved backflow prevention device installed according to the Water District’s specifications.
MM U-5	The Project shall be designed and built in accordance with the PWD Standard Specification regarding the adequate conveyance of storm waters..
MM U-6	All faucets in sinks and lavatories shall be equipped with faucet aerators designed to limit the maximum flow to 2.2 gallons per minute.
MM U-7	All showerheads shall be of a design to limit the maximum flow to 2.5 gallons per minute.
MM U-8	The Developer shall completely offset the water requirements of this Project by complying with the retrofit requirements of Napa Municipal Code Chapter 13.09.
MM U-9	During the construction/demolition/renovation period of the Project, Developer shall use the franchised garbage hauler for the service area in which the Project is located to remove all wastes generated during Project development, unless Developer transports Project waste. If the Developer transports the Project’s waste, Developer must use the appropriate landfill for the service area in which the Project is located.
MM U-10	Developer shall provide for the source separation of wood waste for recycling. Developer shall use the franchised garbage hauler for the service area in which located for collection of such wood waste, unless the Developer transports such wood waste to a location where wood waste is recycled.

MM U-11 A recycling/solid waste enclosure shall be provided in accordance with Chapter 17.102, et seq. of the Napa Municipal Code for all commercial, industrial, and multi-family projects with common solid waste facilities.

10. Inventory of Unavoidable Adverse Impacts

Greenhouse Gas Emissions

Mitigation has been incorporated into the DEIR to reduce potential GHG emissions impacts. However, the Project's operational emissions with mitigation will remain above the BAAQMD thresholds and will, therefore, result in an unavoidable and adverse impact.

11. Organizations Affiliated with the Project

The City of Napa is the Lead Agency for the proposed Project. Contact persons for the Project are:

City of Napa

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Contact Person: Victor Carniglia

Project Applicant

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Project Architect

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Other Organizations Affiliated with the Project

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