

II. SUMMARY

A. PROJECT UNDER REVIEW

This Draft EIR has been prepared to evaluate the environmental impacts of the Napa County Health and Human Services Agency (HHSA) Campus Project (proposed project), located at 2344 Old Sonoma Road in the City of Napa. The existing 8.5-acre campus currently houses all but two divisions within the HHSA and is owned by the County of Napa (County). The campus is currently developed with a total of 85,144 gross square feet of space accommodated within 11 one-story buildings and 6 modular units, and a total of 235 surface parking spaces. The site is bounded by single-family homes and the Napa Junior Adventist Academy to the north; single-family homes on Gesford Street to the east; Old Sonoma Road to the south; and the Napa County Juvenile Justice Center and Walnut Street to the west.

The proposed project would redevelop the HHSA campus to efficiently support operations and client services over approximately the next 20 years. This EIR considers two primary options for the proposed project: 1) redevelopment of the existing HHSA campus occurring within the existing campus boundaries (Existing Site Option) and 2) acquisition of an adjacent 3.25-acre sports field and redevelopment of the HHSA campus occurring within the expanded boundary (Expanded Site Option). Under both development options, a total of up to 184,000 gross square feet of use would be provided and occupants of two off-site County offices would be relocated to the campus.

The Existing Site Option would demolish all existing structures on the campus, including the three buildings (referred to as Buildings A, B, and C) constructed in the 1920s; remove the existing original crescent-shaped driveway; and implement the phased redevelopment of the existing campus with four new buildings. The four new buildings would be two to three stories in height, comprising approximately 184,000 total gross square feet. A new, approximately 62,050 square-foot, two-level parking structure would also be constructed in the northwest portion of the campus, and an approximately 133,300 square-foot surface parking lot would be located in the eastern portion of the campus. A total of approximately 558 parking spaces would be provided, with 215 parking spaces located within the parking structure and 343 spaces within the surface parking lot. Associated site access, landscaping, and infrastructure improvements would also be required.

The Expanded Site Option would retain Buildings A, B, and C and the crescent-shaped driveway and demolish all other buildings. Buildings A, B, and C would be renovated in conformance with the *Department of the Interior Standards for the Treatment of Historic Properties* (including the Standards for Rehabilitation) and four new buildings would be constructed in phases. The four new buildings would range from one- to three-stories in height, comprising a total of approximately 169,470 gross square feet. Three surface parking lots, totaling 195,300 square feet and 558 total parking spaces, would also be constructed. Associated site access, landscaping, and infrastructure improvements would also be required.

Please refer to Chapter III, Project Description for a complete description of the proposed project and the two development options currently under consideration.

The County of Napa is the lead agency for environmental review of the Napa County Health and Human Services Agency Campus Project. This EIR will be used by County staff, responsible agencies, and the public in their review of the proposed project.

B. SUMMARY OF IMPACTS AND MITIGATION MEASURES

Section 15382 of the *CEQA Guidelines* defines a significant effect on the environment as "... a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project..." Therefore, in identifying the significant impacts of the project, this EIR focuses on its substantial physical effects and mitigation measures to avoid, reduce, or otherwise alleviate those effects. This EIR examines the potential direct, indirect, and cumulative environmental impacts of the project and focuses primarily on changes in the environment that would result from project development. This EIR examines all phases of the project including construction and operation.

This summary provides an overview of the analysis contained in Chapter IV, Setting, Impacts, and Mitigation Measures. This summary includes a discussion of: (1) the Initial Study findings; (2) potential areas of controversy; (3) significant project-level impacts; (4) cumulative impacts; (5) significant irreversible and unavoidable impacts; and (6) alternatives to the proposed project that would reduce or avoid the environmental impacts of the project.

1. Summary of the Initial Study Findings

The Initial Study identified no impacts or less-than-significant impacts to the following environmental issues:

- agricultural and forestry resources
- land use and planning
- mineral resources
- population and housing
- fire, police, and school services
- recreation

The Initial Study identified potentially significant impacts to the following environmental issues; however, these were mitigated to a less-than-significant level with mitigation measures recommended in the Initial Study:

- biological resources
- paleontological resources and human remains
- geology and soils
- hazards and hazardous materials
- hydrology and water quality
- utilities and service systems

Table II-1, Summary of Impacts and Mitigation Measures (located at the end of this Chapter), lists these impacts and the recommended mitigation measures. For a complete description of potential impacts and recommended mitigation measures, please refer to the specific discussion in the Initial Study, included as Appendix B to this EIR. Chapter VI, Other CEQA Considerations, also summarizes the findings for each topic not discussed in the EIR.

2. Potential Areas of Controversy

Four letters were submitted in response to the NOP, in addition to the verbal comments made and comment cards received at the scoping session held on November 17, 2011. Scoping comments generally included the following concerns: design compatibility with the adjacent neighborhood; building proximity to adjacent property historic buildings; nighttime lighting and security neighborhood traffic; traffic circulation; daytime noise and activity; safety; park-like quality; and bicycle access. Most of these concerns relate to the existing and proposed intensity of use at the site, and one commenter at the scoping meeting summarized these comments as relating to the “carrying capacity” of the site given its residential surroundings. The NOP and written comments are included in Appendix A of this EIR.

3. Significant Impacts

Implementation of the proposed project has the potential to result in adverse environmental impacts in several environmental areas. As shown in Table II-1, impacts in the following areas would be significant under both development options, although some could be reduced to a less-than-significant level with implementation of the mitigation measures recommended in Chapter IV:

- cultural resources
- transportation, circulation and parking
- air quality
- noise

4. Cumulative Impacts

CEQA defines cumulative impacts as “two or more individual effects which, when considered together, are considerable, or which can compound or increase other environmental impacts.” Section 15130 of the *CEQA Guidelines* requires that an EIR evaluate potential environmental impacts that are individually limited, but cumulatively significant. These impacts can result from the proposed project when combined with other past, present, or reasonably foreseeable future projects.

As discussed in Section IV.B, Cultural Resources, and shown in Table II-1, the Existing Site Option, in conjunction with projects that occurred on the project site in the 1990s that included the removal of other historical resources would result in a cumulatively significant impact to historical resource under CEQA. The project would result in another removal of built environment resources that, when considered in conjunction with the past actions described above, further reduce the integrity of the District and render it no longer able to convey its historical qualities. Mitigation Measures CULT-3a and CULT-3b would reduce the severity of the project’s contribution to the cumulatively significant impact. However, as with the project-specific impact to the Napa County Infirmary Historic District, these mitigation measures would not reduce the severity of this impact to a less-than-significant level. Therefore, this impact would be significant and unavoidable.

As discussed in Section IV.C, Transportation, Circulation and Parking, and shown in Table II-1, the proposed project would contribute traffic volumes to area roads and intersections that are predicted to become congested due to projected growth and development in the region. Multi-part Mitigation Measure TRANS-3 (TRANS-3a through TRANS-3i) would reduce these cumulative impacts to a less-than-significant level and the project would contribute its “fair-share” to these improvements. However, because funding from additional sources would be needed for implementation of these measures, the cumulative impact to these intersections would be significant and unavoidable:

- 1st Street/Freeway Drive;
- 1st Street/California Boulevard;
- 2nd Street/California Boulevard;
- Imola Avenue/Freeway Drive;
- Imola Avenue/SR 29 Southbound Ramps;
- Laurel Street/Jefferson Street;
- Old Sonoma Road/Jefferson Street; and
- Imola Avenue/Jefferson Street.

5. Significant Unavoidable Impacts

As discussed above under “Cumulative Impacts” and shown in Table II-1, implementation of the Existing Site Option would result in a significant unavoidable project-specific and cumulative impact to historic resources due to the demolition of Buildings A, B, and C, and the crescent-shaped driveway that contribute to the Napa County Infirmery Historic District.

In addition, both project options would contribute to a significant and unavoidable impact expected at the following study area intersections, due to increases in traffic congestion over time:

- 1st Street/Freeway Drive;
- 1st Street/California Boulevard;
- 2nd Street/California Boulevard;
- Imola Avenue/Freeway Drive;
- Imola Avenue/SR 29 Southbound Ramps;
- Laurel Street/Jefferson Street;
- Old Sonoma Road/Jefferson Street; and
- Imola Avenue/Jefferson Street.

6. Alternatives to the Proposed Project

In accordance with CEQA and the *CEQA Guidelines* (Section 15126.6), an EIR must describe a reasonable range of alternatives to the project, or to the location of the project, that could attain most of the project’s basic objectives, while avoiding or substantially lessening any of the significantly adverse environmental effects of the project. 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 states that an EIR should not consider alternatives “whose effect cannot be ascertained and whose implementation is remote and speculative.”

The three alternatives to the proposed project analyzed in Chapter V of this EIR are summarized below. These alternatives (with the exception of the CEQA-mandated No Project alternative) were intended to achieve the key objectives of the project while reducing or avoiding significant and less-than-significant environmental effects. The following three alternatives were developed based on input from the County of Napa Planning Division, Department of Public Works, County of Napa Health and Human Services Agency, and the consultant team to reduce the significant and less-than-significant impacts of the project.

- The **No Project alternative** assumes the continuation of existing conditions within the project site. Existing buildings on the site would generally be maintained in their current condition, although some minor renovations would likely occur over the next few years.
- The **Existing Site Preservation alternative** assumes that existing Buildings A, B, and C and the crescent-shaped driveway that contribute to the Napa County Infirmary Historic District would be retained and preserved, all other existing structures would be demolished or removed, and that four new buildings and a parking structure would be developed within the existing campus boundary. The four new buildings would range from one-to four-stories in height, comprising a total of approximately 183,160 gross square feet. The 103,350 square-foot two-level parking structure would be located in the northwest corner of the campus, adjacent to Walnut Street, and would accommodate approximately 325 parking spaces, for a total of 558 campus parking spaces.
- The **Off-Site alternative** assumes the HHSA campus would be relocated and developed on a 15-acre vacant industrially-zoned site within Napa County. The new HHSA campus would include the development of six new buildings and a 203,660 square-foot surface parking lot containing 560 parking spaces. The new buildings would range from one- to two-stories in height, comprising a total of approximately 183,060 gross square feet. The expanded HHSA campus site, which includes the existing sports field currently associated with the Napa Junior Adventist Academy, would be redeveloped with residential uses. All existing buildings on the site would be demolished and the site would be redeveloped with two-story buildings containing a total of up to 77 residential units, including 49 single-family and 28 multi-family units and associated parking.

The No Project alternative is considered the environmentally superior alternative in the strict sense that environmental impacts associated with its implementation would be the least of all the scenarios examined (including the proposed project). However, the No Project alternative would fail to achieve any of the project’s objectives. The Expanded Site Option, which is considered under the proposed project, would be the next-best alternative in terms of reducing the environmental impacts of the project and is thus considered the environmentally superior alternative.

C. SUMMARY TABLE

As previously discussed, Table II-1 summarizes the impacts and mitigation measures for each environmental topic identified in the Initial Study and Chapter IV of the EIR. Table II-1 is arranged in four columns: (1) impacts; (2) level of significance without mitigation; (3) mitigation measures; and (4) level of significance after mitigation. Levels of significance are categorized as follows: SU = Significant and Unavoidable; S = Significant; and LTS = Less Than Significant. For a complete

description of potential impacts and recommended mitigation measures, please refer to the specific discussion in the Initial Study or Chapter IV of the EIR.

Table II-1: Summary of Impacts and Mitigation Measures

Environmental Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
INITIAL STUDY			
IV. BIOLOGICAL RESOURCES			
The proposed project could result in construction-period impacts to nesting bird species.	S	BIO-1: If feasible, vegetation removal activities shall occur during the non-breeding season (September 1–January 31). If such activities are scheduled during the breeding season, a qualified biologist retained by Napa County shall conduct a preconstruction nest survey of all trees or other suitable nesting habitat in and within 100 feet of the limits of work. The survey shall be conducted no more than 15 days prior to the start of work. If the survey indicates the potential presence of nesting birds, the biologist shall report to the County and shall determine an appropriately sized buffer around the nest in which no work shall be allowed until the young have successfully fledged. The size of the nest buffer shall be determined by the biologist in consultation with the California Department of Fish and Game, and will be based on the nesting species and its sensitivity to disturbance. In general, buffer sizes of up to 250 feet for raptors and 50 feet for other birds should suffice to prevent disturbance to birds nesting in the urban environment, but these buffers may be increased or decreased, as appropriate, depending on the bird species and the level of disturbance anticipated near the nest.	LTS
V. PALEONTOLOGICAL RESOURCES AND HUMAN REMAINS			
The proposed project could result in construction-period impacts to previously unidentified paleontological resources.	S	CULT-1a: Should paleontological resources be encountered during project subsurface construction, all ground-disturbing activities within 25 feet shall be redirected and a qualified paleontologist contacted to assess the situation, consult with agencies as appropriate, and make recommendations for the treatment of the discovery. If found to be significant, and project activities cannot avoid the paleontological resources, adverse effects to paleontological resources shall be mitigated. Mitigation may include monitoring, recording the fossil locality, data recovery and analysis, a final report, and submitting the fossil material and technical report to a paleontological repository. Public educational outreach may also be appropriate. Upon completion of the assessment, a report documenting methods, findings, and recommendations shall be prepared and submitted to the County for review and, if paleontological materials are recovered, a paleontological repository, such as the University of California Museum of Paleontology.	LTS

Table II-1 Continued

Environmental Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
<u>CULT-1</u> Continued		<p>CULT-1b: Prior to any groundbreaking activities, the County shall inform the construction contractor(s) of the sensitivity of the project site for paleontological resources and include the following directive in the appropriate contract documents:</p> <p><i>The subsurface of the construction site may be sensitive for paleontological resources. If paleontological resources are encountered during project subsurface construction and a paleontologist is not on site, all ground-disturbing activities within 25 feet shall be redirected and a qualified paleontologist contacted to assess the situation, consult with agencies as appropriate, and make recommendations for the treatment of the discovery. Project personnel shall not collect or move any paleontological materials.</i></p> <p><i>Paleontological resources include fossil plants and animals, and such trace fossil evidence of past life as tracks. Ancient marine sediments may contain invertebrate fossils such as snails, clam and oyster shells, sponges, and protozoa; and vertebrate fossils such as fish, whale, and sea lion bones. Vertebrate land mammals may include bones of mammoth, camel, saber tooth cat, horse, and bison. Paleontological resources also include plant imprints, petrified wood, and animal tracks.</i></p>	LTS
The proposed project could result in construction-period impacts associated with the accidental discovery of human remains interred outside of formal cemeteries.	S	<p>CULT-2: Any human remains encountered during project ground-disturbing activities shall be treated in accordance with California Health and Safety Code Section 7050.5. The County shall inform its contractor(s) of the sensitivity of the project site for human remains and include the following directive in the appropriate contract documents:</p> <p><i>If human remains are uncovered, work within 25 feet of the discovery shall be redirected and the County Coroner notified immediately. At the same time, an archaeologist shall be contacted to assess the situation and consult with agencies as appropriate. Project personnel shall not collect or move any human remains or associated materials. If the human remains are of Native American origin, the Coroner must notify the Native American Heritage Commission within 24 hours of this identification. The Native American Heritage Commission will identify a Native American Most Likely Descendant to inspect the site and provide recommendations for the proper treatment of the remains and associated grave goods.</i></p>	LTS

Table II-1 Continued

Environmental Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
VI. GEOLOGY AND SOILS			
The proposed project could result in seismically induced hazards related to existing geologic conditions and unstable and expansive site soils.	S	<u>GEO-1</u> : Project design and construction shall incorporate the findings and recommendations of a site-specific geotechnical investigation report which shall detail recommendations to reduce or avoid potential hazards associated with seismic and geologic conditions. At a minimum, the report shall address the following potential hazardous geologic conditions: ground shaking, liquefaction, lateral spreading, settlement, and expansive soils. The final geotechnical investigation report shall be prepared by a licensed geotechnical or engineering professional in accordance with the 2010 California Building Code or subsequent codes adopted at the time of construction. The final site-specific geotechnical investigation shall be submitted to the County for review and approval prior to project design and initiation of any site preparation or grading activities. All recommendations for mitigation of seismic and geologic hazards provided in the final report shall be adopted by the project design and engineering team and implemented during development and construction of the project.	LTS
VIII. HAZARDS AND HAZARDOUS MATERIALS			
The proposed project could expose people to hazardous conditions associated with the presence of unknown contaminated soil and/or groundwater or other hazards (e.g., tanks, drums).	S	<u>HAZ-1a</u> : Prior to excavation or earthmoving activities at the site, the Napa County Public Works Department shall use reasonable means to determine the presence of soil and/or groundwater contamination at the project site. Those reasonable means may consist of soil and/or groundwater sampling, and/or conducting a Phase I Environmental Site Assessment (ESA) and, if necessary, a Phase II ESA in accordance with the most recent ASTM International Standard. A qualified environmental professional (e.g., Professional Geologist, Professional Engineer) shall complete these investigations. Where the results of the studies indicate that soil and/or groundwater contamination is present, any necessary remediation shall be conducted. The findings of the investigation(s) shall be documented in a written report and shall be submitted to the Napa County Public Works Department.	LTS

Table II-1 *Continued*

Environmental Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
<p><u>HAZ-1</u> <i>Continued</i></p>		<p><u>HAZ-1b:</u> If the results of the investigation(s) completed in Mitigation Measure HAZ-1a above indicate the presence of hazardous materials, site remediation may be required by the applicable state or local regulatory agencies. Specific remedies would depend on the extent and magnitude of contamination and requirements of the regulatory agency(ies). Under the direction of the regulatory agency(ies) and the County, a Site Remediation Plan shall be prepared, as required, by the County Public Works Department. The Plan shall: 1) specify measures to be taken to protect workers and the public from exposure to the potential hazards and, 2) certify that the proposed remediation would protect the public health in accordance with local, state, and federal requirements, considering the land use proposed. Excavation and earthmoving activities associated with the proposed project shall not proceed until the Site Remediation Plan has been reviewed and approved by the regulatory oversight agency and is on file with the County.</p>	
		<p><u>HAZ-1c:</u> Where any activity would be performed where hazardous materials are known or suspected, the contractor(s) shall prepare a project-specific Health and Safety Plan prior to any project site work. The Plan shall include required worker health and safety provisions for all workers potentially exposed to contaminated materials, identification of hazardous materials present, monitoring to be performed during site activities (as appropriate), required training for workers, identification of appropriate personal protective equipment, and designated personnel responsible for Plan implementation. The Health and Safety Plan shall be filed with the regulatory oversight agency and the County.</p>	
		<p><u>HAZ-1d:</u> If previously unknown contaminated soil and/or groundwater is encountered at any time during construction activities (e.g., identified by odor or visual staining, or if any underground storage tanks, abandoned drums, or other hazardous materials or wastes are encountered), the contractor(s) shall ensure that all appropriate response measures are taken to protect human health and the environment. A contingency plan for sampling and analysis of previously unknown hazardous substances shall be prepared by the contractor(s), with the approval of the County Public Works Department, prior to grading and earthmoving activities.</p>	

Table II-1 *Continued*

Environmental Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
<u>HAZ-1</u> <i>Continued</i>		<p>As part of this contingency plan, soil and/or groundwater samples shall be collected by a qualified environmental professional (e.g., Professional Geologist, Professional Engineer) prior to further work in the area, as appropriate. The samples shall be submitted for laboratory analysis by a state-certified laboratory under chain-of-custody procedures. The analytical methods shall be selected by the environmental professional and shall be based on the suspected contamination and consideration of work completed under Mitigation Measure HAZ-1a. The analytical results of the sampling shall be reviewed by a qualified environmental professional and submitted to the County. The professional shall provide recommendations, as applicable, regarding soil/waste management, worker health and safety training, and regulatory agency notifications, in accordance with local, state, and federal requirements. Work shall not resume in the area(s) affected until these recommendations have been implemented under the oversight of the County or regulatory agency, as appropriate.</p> <p><u>HAZ-1e</u>: If engineering fill is needed on-site, it shall be demonstrated, by analytical testing, not to pose an unacceptable risk to human health or the environment. Threshold criteria for acceptance of engineered fill shall be selected based on screening levels and protocols developed by regulatory agencies for protection of human health and leaching to groundwater (e.g., Water Board ESLs). The engineered fill shall be characterized by representative sampling in accordance with U.S. EPA's SW-846 Test Methods, by a qualified environmental professional and demonstrated to meet the threshold criteria above. The results of the sampling and waste characterization shall be submitted by the contractor(s) to the County Public Works Department prior to construction.</p>	

Table II-1 Continued

Environmental Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
The proposed project could expose people to hazardous conditions associated with the presence of hazardous building materials.	S	HAZ-2: A hazardous building materials survey shall be performed by a qualified environmental professional retained by the Napa County Public Works Department prior to demolition of any site structures. The hazardous building materials surveys shall include inspections of asbestos, lead-based paint, and sources of universal wastes. If asbestos containing materials are determined to be present, the materials shall be abated by a certified contractor in accordance with Bay Area Air Quality Management District regulations and notification requirements. If lead-based paint is present, protective measures and air monitoring shall be implemented by qualified workers during activities that generate potential airborne exposures to lead in accordance with the California Department of Industrial Relations, Division of Occupational Safety and Health regulations and notification requirements. Loose or peeling lead-based paint shall be removed by a qualified worker and disposed of in accordance with existing hazardous waste regulations. If lead, asbestos, or other hazardous building materials are present, then applicable federal and State construction worker health and safety regulations shall be implemented during construction activities.	LTS
IX. HYDROLOGY AND WATER QUALITY			
The proposed project could result in construction-period and operation-period impacts to water quality.	S	<p>HYDRO-1a: Prior to grading and construction activities, the County shall apply for coverage under the NPDES General Construction Activity Permit from the State Water Quality Control Board by filing a Notice of Intent (NOI), and, as part of the permit and monitoring process, prepare and implement a SWPPP. The General Construction Activity Permit shall be maintained on file at the Napa County Public Works Department and at the HHS campus.</p> <p>The SWPPP shall include design details and construction specifications for all site drainage control and other water quality control strategies. It shall also detail the implementation schedule, methods and locations of erosion and water quality control features. The California Stormwater Quality Association Construction Handbook (CASQA 2003) and County Ordinances provide guidance for selecting and implementing Best Management Practices (BMPs) that would eliminate or reduce the discharge of pollutants from construction sites to waters of the state. Three levels of BMPs are considered for each potential pollutant: source control, management control, and treatment control. Passive, low-maintenance BMPs (e.g., bioretention areas, grassy swales, porous pavements) are preferred in all areas. Higher-maintenance BMPs may only be used if the development of at-grade treatment systems is not possible, or would not adequately treat runoff.</p>	LTS

Table II-1 *Continued*

Environmental Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
<u>HYDRO-1</u> <i>Continued</i>		<p><u>HYDRO-1b:</u> Prior to grading and construction activities, the County shall prepare a Storm Water Management Plan (SWMP). This document shall set forth the strategy for post-construction (or ‘operational phase’) stormwater quality as required by the Regional Water Quality Control Board and the County of Napa Municipal Code, in addition to NCSPPP guidelines. The SWMP would aim to minimize or eliminate stormwater-related impacts both on- and off-site, using a three tiered approach to stormwater management:</p> <ul style="list-style-type: none"> • Level I: Site Design sets the stage for an effective plan, primarily by limiting impervious area and the connections between impervious areas. • Level II: Source Control focuses on preventing or limiting the release of constituents and flows of concern. • Level III: Treatment Control aims to reduce constituents and flows of concern once they are mobilized. <p>At each level, the plan would utilize structural or design elements known as BMPs, which refer to any kind of procedure or device designed to minimize the quantity of pollutants that enter local water resources. The Napa County Department of Public Works shall ensure that the SWMP is prepared and is adequate prior to approval of the final grading plan for each phase of development.</p>	
The proposed project could exceed the capacity of the City’s storm drain system.	S	<p><u>HYDRO-2:</u> As a condition of project approval, the County of Napa shall prepare a stormwater flow projection study and a hydraulic capacity study, to be submitted to the City of Napa Public Works Department for review and verification that the existing storm system is properly sized to meet the projected increase in stormwater flows on the project site. The studies shall show the new connecting points to the existing storm drain and model the estimated flows and peaking factors, as they relate to the increase of building square footage and reconfiguration of impermeable and permeable surfaces on the project site. The studies shall show that the reconfigured drainage pattern would not result in increased on- or off-site erosion, siltation, or flooding. Any required improvement shall be in place prior to occupancy of new buildings for each phase of redevelopment.</p>	LTS

Table II-1 Continued

Environmental Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
XVII. UTILITIES AND SERVICE SYSTEMS			
The proposed project could exceed the capacity of existing water distribution infrastructure.	S	<u>UTL-1</u> : The County shall prepare a detailed water pipe hydraulic flow analysis, to be reviewed and approved of by the City of Napa Public Works Department, to determine whether the existing water distribution system is properly sized to meet the projected new water demands on the project site. The County would be responsible for the construction of new or upgraded infrastructure required to serve the proposed project.	LTS
The proposed project could exceed the capacity of existing wastewater infrastructure.	S	<u>UTL-2</u> : The County shall prepare a sewer flow projection study and a hydraulic capacity study, to be reviewed and approved of by the Napa Sanitation District, to verify that the existing sewer system is properly sized to meet the projected wastewater generation on the project site. The studies shall show the new connecting points to the existing sewers and model the estimated flows and peaking factors, as they relate to the increase in square footage of uses on the campus. The County would be responsible for the construction of new or upgraded infrastructure required to serve the proposed project.	LTS
ENVIRONMENTAL IMPACT REPORT			
A. VISUAL RESOURCES			
<u>VIS-1</u> : Under both the Existing Site Option and Expanded Site Option, the proposed project would introduce new sources of glare and lighting to the campus.	S	<u>VIS-1</u> : The County shall prepare a lighting plan prior to approval of the final design-build (bridging) documents. Consistent with the County’s standard Conditions of Approval, the Lighting Plan shall ensure the use of reflective exterior materials is minimized and that proposed reflective material would not create additional daytime or nighttime glare. The Lighting Plan shall ensure that any outdoor night lighting for the project is downward-facing and shielded so as not to create additional nighttime glare.	LTS
B. CULTURAL RESOURCES			
<u>CULT-3</u> : Implementation of the Existing Site Option would demolish all buildings that contribute to the Napa County Infirmary Historic District along with the crescent-shaped driveway, which would adversely affect a historical resource as defined under CEQA.	S	<u>CULT-3a</u> : Prior to demolition activities on the campus, the County shall retain a qualified cultural resources professional to prepare a historical context report and photo-documentation of the Napa County Infirmary Historic District. Photo-documentation of the District shall be included in the report to provide additional descriptive data and a permanent visual record of the resources. The photo-documentation shall be done according to Historic American Building Survey/Historic American Engineering Record (HABS/HAER) guidelines. Based on the curation requirements of the receiving institution, either hardcopies and/or electronic copies of the report and photo-documentation shall be offered to the Napa County Historical Society, Napa County Landmarks, Napa Valley Museum,	SU

Table II-1 Continued

Environmental Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
<u>CULT-3</u> Continued		<p>Preservation Napa Valley, the Napa County Library, and the Northwest Information Center at Sonoma State University. The County shall also be responsible for ensuring that the report and photo-documentation are available to the general public via the internet.</p> <p><u>CULT-3b</u>: The County shall set aside a publicly accessible space within the project site for an interpretive panel that documents the historical significance of the project site and Napa County Infirmary Historic District. The panel shall include historical photographs and/or drawings of the Napa County Infirmary Historic District. The County shall also be responsible for ensuring that the panel is maintained and visible to the general public. The location of the interpretive panel shall be depicted on the final Master Plan for the site.</p>	
<u>CULT-4</u> : Ground-disturbing activities associated with both the Existing Site and Expanded Site Options have the potential to disturb previously unrecorded subsurface archaeological resources.	S	<p><u>CULT-4</u>: Construction-related ground disturbance below soil that is demonstrated to be fill shall be monitored by a qualified archaeologist. In the event that subsurface archaeological resources are uncovered, archaeological monitors shall be empowered to halt construction activities at the location of the discovery to review possible archaeological material and to protect the resource while the finds are being evaluated. Monitoring shall continue until, in the archaeologist's judgment, cultural resources are not likely to be encountered.</p> <p>Archaeological monitoring shall be implemented through the execution of an Archaeological Monitoring and Evaluation Plan (AMEP). The purpose of the AMEP is to ensure that significant archaeological deposits discovered during construction are identified, evaluated, and appropriately treated through the use of a pre-established research design and field evaluation strategy, consistent with the requirements of CEQA Guidelines §15126.4 (b)(3)(C). The AMEP shall be approved by the County well in advance of construction, and its implementation shall be made a condition of the issuance of a grading or building permit for the project. The AMEP shall be prepared by a professional who meets the Secretary of the Interior's Professional Qualifications Standards in historical archaeology and prehistoric archaeology (36 CFR Part 61, Appendix A).</p>	LTS

Table II-1 Continued

Environmental Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
<p><u>CULT-4</u> <i>Continued</i></p>		<p>The AMEP shall include a construction monitoring component and an evaluation component. The monitoring component of the AMEP should refine the archaeological sensitivity of the project area to: (1) identify areas that will be subject to monitoring; (2) define the frequency of monitoring; and (3) identify those areas with little to no possibility of containing intact deposits. This assessment shall focus on the project area’s land use history based on available historical maps and photographs, past site improvement/utilities construction plans, historical documents, and soils/geotechnical information.</p> <p>The evaluation component of the AMEP would guide fieldwork if archaeological resources identified during monitoring are evaluated for legal significance. The purpose of this component is to establish an evaluation process to shorten the time necessary to respond to and evaluate discoveries made during archaeological monitoring. The evaluation component shall contain a field study and technical analysis work plan to guide the methods and procedures to be used during the significance evaluation.</p> <p>In the event that archaeological resources are identified during project ground-disturbing activities and an archaeological monitor is not on site, the County’s Standard Condition of Approval for accidental discovery of archaeological artifacts and human remains shall apply.</p>	
<p>C. TRANSPORTATION, CIRCULATION AND PARKING</p>			
<p><u>TRANS-1</u>: Old Sonoma Road/Connection to Freeway Drive. The project contributes to existing LOS F conditions in the AM peak hour (97 AM peak hour trips) at the worst-case approach. The contribution to AM peak hour traffic volumes at the worst-case approach is greater than 50 trips. This results in both a project-specific and cumulative impact at this intersection.</p>	<p>S</p>	<p><u>TRANS-1</u>: Install a traffic signal at this intersection to achieve acceptable operations at LOS B. The peak hour signal warrant for this intersection is met in the AM peak hour. This would reduce this impact to a less-than-significant level.</p> <p>The decision to install a signal should not be based solely upon the warrants, since the installation of signals can increase the risk of certain types of collisions. The City of Napa should undertake regular monitoring of actual traffic conditions and accident data, and timely re-evaluation of the full set of warrants in order to prioritize and program intersections for signalization. The ultimate decision should be made by the City Traffic Engineer. This mitigation measure would be 100 percent funded by the County because it would address a significant impact caused directly by the proposed project.</p>	<p>LTS</p>

Table II-1 Continued

Environmental Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
<p><u>TRANS-2:</u> Old Sonoma Road/Old Sonoma Road (in front of Juvenile Justice Center). The project contributes to existing LOS F conditions in the AM peak hour (53 AM peak hour trips) at the worst-case approach. The contribution to AM peak hour traffic volumes at the worst-case approach is greater than 50 trips. The addition of project traffic is expected to cause the worst-case approach of the intersection to deteriorate from LOS C to LOS E in the PM peak hour. This results in both a project-specific and cumulative impact at this intersection.</p>	S	<p><u>TRANS-2:</u> The project is proposing to eliminate the westbound soft right turn, creating a T-intersection. Along with this proposed roadway modification, a traffic signal shall be installed at this intersection to achieve acceptable operations at LOS A in both AM and PM peak hours. The peak hour signal warrant for this intersection is met in the AM and PM peak hours. This would reduce this impact to a less-than-significant level.</p> <p>The decision to install a signal should not be based solely upon the warrants, since the installation of signals can increase the risk of certain types of collisions. The City of Napa should undertake regular monitoring of actual traffic conditions and accident data, and timely re-evaluation of the full set of warrants in order to prioritize and program intersections for signalization. The ultimate decision should be made by the City Traffic Engineer. This mitigation measure would be 100 percent funded by the County because it is addressing a significant impact caused directly by the proposed project.</p>	LTS
<p><u>TRANS-3:</u> Project traffic would contribute to cumulative deficiencies (i.e., unacceptable LOS) projected to occur at 8 study area intersections within the City of Napa’s/Caltrans’ jurisdiction due to increases in traffic volumes over time. These include: 1st Street/Freeway Drive, 1st Street/California Boulevard, 2nd Street/California Boulevard, Imola Avenue/Freeway Drive, Imola Avenue/SR 29 Southbound Ramps, Laurel Street/Jefferson Street, Old Sonoma Road/Jefferson Street, and Imola Avenue/Jefferson Street.</p>	S	<p><u>TRANS-3a:</u> Prior to construction, the County shall enter into an agreement with the City of Napa or Caltrans, as applicable, to fund its “fair-share” of the improvements identified below when needed to address delays to cumulative traffic volumes. The agreement shall specify the nature and cost of the measure, the County’s percentage, or “fair share,” the timing of payment, and the timing of implementation by the agency with jurisdiction or its designee. “Fair share” payments shall only be required for mitigation measures that are programmed (i.e., planned and scheduled) for implementation by the agency with jurisdiction. The calculated fair-share contribution for each intersection is as specified in Table IV.C-11.</p>	SU

Table II-1 Continued

Environmental Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation																		
<p>TRANS-3 Continued</p>		<p>Table IV.C-11: Project’s Fair-Share Contribution to Cumulative Intersection Impacts</p> <table border="1"> <thead> <tr> <th>Intersection</th> <th>Fair-Share Percentage</th> </tr> </thead> <tbody> <tr> <td>1. 1st Street/Freeway Drive</td> <td>1.19</td> </tr> <tr> <td>4. 1st Street/California Boulevard</td> <td>2.04</td> </tr> <tr> <td>5. 2nd Street/California Boulevard</td> <td>4.65</td> </tr> <tr> <td>10. Imola Avenue/Freeway Drive</td> <td>2.10</td> </tr> <tr> <td>11. Imola Avenue/SR Southbound Ramps</td> <td>1.59</td> </tr> <tr> <td>17. Laurel Street/Jefferson Street</td> <td>2.96</td> </tr> <tr> <td>18. Old Sonoma Road/Jefferson Street</td> <td>4.79</td> </tr> <tr> <td>19. Imola Avenue/Jefferson Street</td> <td>1.14</td> </tr> </tbody> </table>	Intersection	Fair-Share Percentage	1. 1 st Street/Freeway Drive	1.19	4. 1 st Street/California Boulevard	2.04	5. 2 nd Street/California Boulevard	4.65	10. Imola Avenue/Freeway Drive	2.10	11. Imola Avenue/SR Southbound Ramps	1.59	17. Laurel Street/Jefferson Street	2.96	18. Old Sonoma Road/Jefferson Street	4.79	19. Imola Avenue/Jefferson Street	1.14	
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<p>Source: Fehr & Peers, 2012.</p> <p>TRANS 3b: To reduce the impact at the 1st Street/Freeway Drive intersection, the eastbound exclusive right-turn lane should be converted to a combined eastbound thru and right-turn lane alongside the addition of two northbound left-turn lanes. The addition of two northbound left-turn lanes would convert the approach from a combined northbound-left and thru lane and right turn lane to dual left turn lanes, an exclusive northbound-thru lane, and a northbound right turn lane. As part of this mitigation, the cycle length should be changed to 75 seconds. These combined changes would reduce average delay to 31 seconds and would result in LOS C at this intersection, which is similar to existing operating conditions. This improvement could require right-of-way take on the southeast corner of the intersection, which could render it infeasible. Further coordination with the City of Napa would be required.</p> <p>In considering whether to adopt this mitigation measure, consideration should be given to the fact that such an extensive widening of roadways at this intersection would substantially increase pedestrian crossing distances and may not be consistent with the County’s and City’s desire to promote transit and bicycling as alternative transportation modes.</p>																					
<p>TRANS-3c: To reduce the impact at the 1st Street/California Boulevard intersection, a roundabout should be installed at the intersection. According to 2010 HCM Methodology, a roundabout with two approach lanes from each direction, and bypass lanes for the southbound-right and eastbound-right movements would improve LOS from F to C in the AM peak hour, and reduce average delay in the PM peak hour (although LOS would remain at F). The ultimate decision should be made by the City Traffic Engineer.</p>																					

Table II-1 *Continued*

Environmental Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
<p><u>TRANS-3</u> <i>Continued</i></p>		<p><u>TRANS-3d</u>: To reduce the impact at the 2nd Street/California Boulevard intersection, a traffic signal shall be installed to achieve acceptable operations at LOS A in both AM and PM peak hours. The peak hour signal warrant for this intersection is met in the AM and PM peak hours. However, the decision to install a signal should not be based solely upon the warrants, since the installation of signals can increase the risk of certain types of collisions. The City of Napa should undertake regular monitoring of actual traffic conditions and accident data, and timely re-evaluation of the full set of warrants in order to prioritize and program intersections for signalization. The ultimate decision should be made by the City Traffic Engineer.</p>	
		<p><u>TRANS-3e</u>: To reduce the impact at the Imola Avenue/Freeway Drive intersection to a less-than-significant level, a traffic signal shall be installed at this intersection, plus the conversion of the existing westbound combined left/thru lane to exclusive westbound thru lane, plus the insertion of an exclusive westbound-left turn pocket. This modified lane geometry could be accommodated within existing right-of-way; however, coordination with Caltrans would still be required to ultimately determine feasibility. Implementation of this measure would improve operations to acceptable LOS D in the AM peak hour and LOS B in the PM peak hour.</p> <p>The peak hour signal warrant for this intersection is met in the AM and PM peak hours. However, the decision to install a signal should not be based solely upon the warrants, since the installation of signals can increase the risk of certain types of collisions. The City of Napa should undertake regular monitoring of actual traffic conditions and accident data, and timely re-evaluation of the full set of warrants in order to prioritize and program intersections for signalization. The ultimate decision should be made by the City Traffic Engineer.</p>	

Table II-1 *Continued*

Environmental Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
<p><u>TRANS-3</u> <i>Continued</i></p>		<p><u>TRANS-3f</u>: To reduce the impact at the Imola Avenue/SR 29 Southbound Ramps intersection, the off-ramp should be widened to include a right-turn lane and two exclusive left-turn lanes. Implementation of this improvement would improve operations to acceptable LOS D. This improvement could require right-of-way take on the northwest corner of the intersection, which could render it infeasible. Coordination with the City of Napa and Caltrans would be required, and would likely involve further study to determine feasibility. In determining whether to adopt this mitigation, consideration should be given to the adverse effects that roadway widening could have on pedestrian crossing distances.</p>	
		<p><u>TRANS-3g</u>: To reduce the impact at the Laurel Street/Jefferson Street intersection to a less-than-significant level, a traffic signal should be installed at this intersection to achieve acceptable operations at LOS B in the AM and PM peak hours. The peak hour signal warrant for this intersection would be met in the AM and PM peak hours. However, the decision to install a signal should not be based solely upon the warrants, since the installation of signals can increase the risk of certain types of collisions. The City of Napa should undertake regular monitoring of actual traffic conditions and accident data, and timely re-evaluation of the full set of warrants in order to prioritize and program intersections for signalization. The ultimate decision should be made by the City Traffic Engineer.</p>	
		<p><u>TRANS-3h</u>: To reduce the impact at the Old Sonoma Road/Jefferson Street intersection to a less-than-significant level, a traffic signal should be installed at this intersection to achieve acceptable operations at LOS B in both AM and PM peak hours. The peak hour signal warrant for this intersection would be met in the AM and PM peak hours. However, the decision to install a signal should not be based solely upon the warrants, since the installation of signals can increase the risk of certain types of collisions. The City of Napa should undertake regular monitoring of actual traffic conditions and accident data, and timely re-evaluation of the full set of warrants in order to prioritize and program intersections for signalization. The ultimate decision should be made by the City Traffic Engineer.</p>	

Table II-1 Continued

Environmental Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
<u>TRANS-3</u> Continued		<u>TRANS-3i</u> : To reduce the impact at the Imola Avenue/Jefferson Street intersection to a less-than-significant level, the westbound exclusive right-turn lane shall be converted to a combined westbound thru and right-turn lane. This suggested mitigation would reduce average delay to 46 seconds and would result in LOS D at this intersection, which is similar to existing operating conditions. This improvement would not require right-of-way take at the intersection. However, further coordination with Caltrans would be required.	
<u>TRANS-4</u> : Without a Construction Management Plan, construction activity may adversely affect vehicle, pedestrian, and bicycle circulation in the area.	S	<u>TRANS-4</u> : The construction contractor shall develop and submit a Construction Management Plan (CMP) to Napa County for approval prior to commencement of any construction activities. The provisions of a CMP are specifically designed to address the characteristics of construction-related traffic associated with development. Such plans identify construction phasing and the level and type of construction-related traffic. The CMP shall identify construction truck routes to access the project site, lane closures on existing public streets, if needed, on-site staging requirements, and other information as required by Napa County.	LTS
<u>TRANS-5</u> : Construction traffic may adversely affect pavement conditions in the area.	S	<p><u>TRANS-5</u>: Prior to beginning construction on the proposed project, the County shall conduct a survey of road conditions on the proposed truck haulage route along Walnut Street/Old Sonoma Road/Jefferson Street/Imola Avenue. Alternatively, the City may have existing surveys that the County may utilize.</p> <p>This shall include roadway pavement and other surfaces that construction traffic may cross. The project applicant shall return roadway conditions to their pre-construction conditions (or better) following the remediation and grading phase of the project.</p> <p>For subsequent construction phasing, truck traffic to/from the project shall be monitored on the identified roadways to determine project's construction traffic contribution to overall truck traffic. The County shall pay a fair share contribution to return roadway conditions to their pre-construction conditions following each phase of construction.</p>	LTS

Table II-1 Continued

Environmental Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
D. AIR QUALITY			
<p><u>AIR-1</u>: Demolition and construction-period activities occurring under the Existing Site Option and Expanded Site Option would generate dust, exhaust, and organic emissions.</p>	S	<p><u>AIR 1</u>: Consistent with the Best Management Practices required by the BAAQMD, the following actions shall be incorporated into construction contracts and specifications for the project:</p> <ul style="list-style-type: none"> • All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day. • All haul trucks transporting soil, sand, or other loose material off-site shall be covered. • All visible mud or dirt tracked-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited. • All vehicle speeds on unpaved roads shall be limited to 15 mph. • All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. • Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used. • 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. • 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. • A publicly visible sign shall be posted with the telephone number and contact information for the designated on-site construction manager available to receive and respond to dust complaints. This person shall report all complaints to Napa County and take immediate corrective action as soon as practical but not more than 48 hours after the complaint is received. The BAAQMD’s phone number shall also be visible to ensure compliance with applicable regulations. 	LTS

Table II-1 Continued

Environmental Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
<u>AIR-2</u> : Operation of emergency generators could result in an increased health risk for sensitive receptors in the project vicinity.	S	<u>AIR 2</u> : All future generator installations shall be located a minimum of 200 feet from any residential dwelling units or a health risk assessment shall be conducted for the proposed generators with results indicating any future generator installations and test schedules would not result in a carcinogenic health risk of more than 10 in 1 million.	LTS
E. GREENHOUSE GAS EMISSIONS			
<i>There are no significant Greenhouse Gas Emissions impacts.</i>			
F. NOISE			
<u>NOISE-1</u> : Implementation of both the Existing Site Option and Expanded Site Option would expose noise sensitive uses in the project vicinity to potentially excessive demolition and construction noise levels.	S	<u>NOISE-1</u> : The County shall ensure compliance with the following measures: <ul style="list-style-type: none"> The construction contractor shall limit construction activities to the hours of 7:00 a.m. to 7:00 p.m., Monday through Friday. No start-up of machines or equipment shall be permitted prior to 8:00 a.m., Monday through Friday; delivery of materials or equipment shall be prohibited prior to 7:30 a.m. and past 5:00 p.m., Monday through Friday. Furthermore, no cleaning of machines or equipment shall be permitted past 6:00 p.m., Monday through Friday; and no servicing of equipment shall be permitted past 6:45 p.m., Monday through Friday. Construction on weekends or legal holidays shall be limited to the hours of 8:00 a.m. to 4:00 pm., unless a permit has first been secured from the City Manager, or designee, pursuant to the procedures and policies of the Municipal Code. The construction contractor shall ensure that construction equipment is well maintained and used judiciously to be as quiet as practical. Equipment and trucks used for project construction shall utilize the best available noise control techniques (e.g., improved mufflers, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds), wherever feasible; all muffler systems on construction equipment shall be properly maintained; 	LTS

Table II-1 *Continued*

Environmental Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
<p><u>NOISE-1</u> <i>Continued</i></p>		<ul style="list-style-type: none"> • The construction contractor shall utilize “quiet” models of air compressors and other stationary noise sources where such technology exists. Implement “quiet” pile driving technology (such as pre-drilling of piles, the use of more than one pile driver to shorten the total pile driving duration), where feasible, in consideration of geotechnical and structural requirements and conditions. Impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for project demolition or construction shall be hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves shall be used if such jackets are commercially available, and this could achieve a reduction of 5 dBA. Quieter procedures shall be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures; • The construction contractor shall locate stationary noise-generating equipment as far as possible from sensitive receptors that adjoin construction sites. All stationary construction equipment placed within 50 feet of noise sensitive land uses shall be equipped with acoustical shielding; • The construction contractor shall prohibit unnecessary idling of internal combustion engines. All construction and grading equipment shall be shut down when not actively in use; • The construction contractor shall post signs at the construction site that include permitted construction days and hours, a day and evening contact number for the job site, and a day and evening contact number for the on-site complaint and enforcement manager, and the City Manager or designee, in the event of problems. • The construction contractor shall coordinate the construction phasing, to the extent feasible, so as to limit noise producing construction activities that could occur within 200 feet of the Napa Junior Adventist Academy educational buildings under the Expanded Site Option, to days and hours when the school’s educational classes are not in session (i.e., late afternoons, weekends, and school vacation days, including, but not limited to, summer break). 	

Table II-1 Continued

Environmental Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
<p>NOISE-2: Implementation of both the Existing Site Option and Expanded Site Option would result in the exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.</p>	<p>S</p>	<p>NOISE-2: The County shall ensure compliance with the following measures:</p> <ul style="list-style-type: none"> • The construction contractor shall implement Mitigation Measure NOISE-1, including restrictions on the permissible hours of construction, in order to reduce annoyance or disturbance impacts for persons of normal sensitiveness living in adjacent structures to the project site. • The construction contractor shall utilize alternative methods for construction of foundations of all project buildings that would be constructed within 100 feet of sensitive structures. Alternative methods may include, but are not limited to, such techniques as auger cast piles, screw piles, or matt slab foundation. Sensitive structures include any occupied structure that could potentially be damaged by groundborne vibration levels in excess of 0.2 PPV. • The construction contractor shall ensure that heavy construction equipment such as large vibratory roller compactors, do not operate at any time within 30 feet of sensitive structures in the project vicinity. In addition, the construction contractor shall ensure that heavy construction equipment such as large bulldozers, large dump- or materials delivery-trucks, or similar heavy equipment, do not operate at any time within 15 feet of sensitive structures in the project vicinity. Alternative equipment may include, but are not limited to, smaller vibratory rolling compactors, vibrating plate compactors, and/or jumping jack compactors. 	<p>LTS</p>
<p>NOISE-3: Implementation of the project would result in a substantial temporary or periodic increase in ambient noise levels in the project site vicinity above levels existing without the project.</p>	<p>S</p>	<p>NOISE-3: The County shall implement the measures outlined in Mitigation Measure NOISE-1.</p>	<p>LTS</p>

Source: LSA Associates, Inc., 2012.

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