

## **VI. OTHER CEQA CONSIDERATIONS**

As required by the California Environmental Quality Act (CEQA), this chapter discusses the following types of impacts that could result from implementation of the proposed Napa County Health and Human Services Agency Campus Project: effects found not to be significant; growth-inducing impacts; significant unavoidable environmental impacts; and significant irreversible changes.

### **A. EFFECTS FOUND NOT TO BE SIGNIFICANT**

Based on the analysis provided in the Initial Study, included in Appendix B, the proposed project would not result in significant impacts related to the following environmental issue topics, which are not further evaluated in the EIR. Some topics considered in the Initial Study would require implementation of standard mitigation measures to be implemented prior to or during the construction period to reduce impacts to a less-than-significant level. These measures are summarized below, as appropriate. Table II-1 in Chapter II, Summary, of this EIR also contains a summary of the environmental impacts and mitigation measures identified in the Initial Study.

#### **1. Agricultural and Forestry Resources**

The project site is currently developed with the existing HHS campus and is located in an urban area in the City of Napa. There are no agricultural resources located on or near the campus and the site is classified as “Urban and Built-Up Land” by the State Department of Conservation. Therefore, the proposed project would not result in any impacts to agricultural resources.

The developed campus is zoned as Quasi-Public (PQ-P) on the City of Napa Zoning Map, and as a result, would not conflict with existing zoning for, or cause rezoning of, forestland or timberland. The proposed project also would not result in the loss of forest land or conversion of forestland to non-forest-uses.

#### **2. Biological Resources**

The project site is located in an urbanized area and is currently developed with the HHS campus, which includes buildings, modular units, parking lots, open space area, and the adjacent sports field that may be acquired for campus expansion. Overall, the project site has low biological value. Build-out of the proposed project would require the removal of ornamental trees and shrubs on the campus. However, wildlife species that would be expected to use or pass through the site are common species that are adapted to urban environments, and would not be substantially adversely affected by redevelopment of the project site. Implementation of Mitigation Measure BIO-1 would ensure that the removal of ornamental trees and shrubs that could be used by nesting native birds would not lead to a significant adverse effect. Mitigation Measure BIO-1 requires a preconstruction nest survey of all trees and suitable nesting habitat in and within 100 feet of the limits of vegetation removal activities if such activities are scheduled during the breeding season (September 1 to January 31). No habitat for candidate, sensitive, or special-status species has been identified on the site. Therefore, the proposed project would not result in direct or indirect adverse effects on special-status plant or wildlife species.

### 3. Paleontological Resources and Human Remains

The project site and vicinity does not contain any known paleontological resources. Human remains interred outside of formal cemeteries also have not been identified within the project area. However, it is possible that previously unknown paleontological resources or human remains could be encountered during project demolition, site preparation, or subsurface construction and ground-disturbing activities. Implementation of Mitigation Measures CULT-1 and CULT-2 would ensure that potential impacts associated with the disturbance of subsurface paleontological resources and human remains would be reduced to less-than-significant levels. Please refer to Section IV.B of this EIR for a discussion of potential impacts to historic and archaeological resources.

### 4. Geology and Soils

The project site is not located within a designated Alquist-Priolo Earthquake Fault Hazard Zone and would not be subject to fault rupture. However, the project site could be subject to structural damage from ground shaking during a seismic event. Implementation of Mitigation Measure GEO-1, which requires the preparation of a site-specific geotechnical investigation for the proposed project and implementation of the recommendations and specifications set forth in the investigation, would reduce the potential hazards associated with strong seismic ground shaking, liquefaction of soils, unstable soils, and expansive soils at the project site to a less-than significant level. The project would not be subject to adverse effects associated with landslides and soil erosion. The proposed project would demolish some or all of the existing structures on the site, remove existing some landscaping and pavement, and require site grading. Implementation of Mitigation Measures HYD-1a and HYD-1b would reduce erosion impacts during project construction and operation to a less-than-significant level.

### 5. Hazards and Hazardous Materials

A review of regulatory databases, including listed hazardous materials release sites compiled pursuant to Government Code 65962.5, did not identify any hazardous materials releases at or adjacent to the project site.<sup>1</sup> Therefore, the project would not impact the public or the environment with respect to a reported release or disposal of hazardous materials related to a listed site.

Subsurface conditions on the project site could be adversely affected by previously unknown contaminated soil and/or groundwater or other hazards. In addition, due to the age of the existing structures proposed for demolition or remodeling at the project site, hazardous building materials, such as asbestos or lead-containing materials, may be present and could pose a threat of a hazardous materials release or affect construction workers and the public, if not handled properly.

Implementation of Mitigation Measures HAZ-1a, HAZ-1b, HAZ-1c, HAZ-1d, HAZ-1e, and HAZ-2 would reduce potentially significant impacts associated with potential hazardous materials in soil, groundwater, and building materials at the project site to a less-than-significant level. Implementation of these mitigation measures requires: 1) the Napa County Public Works Department to either conduct soil and/or groundwater sampling or a Phase I Environmental Site Assessment (ESA), and if necessary, a Phase II ESA; 2) preparation of a Site Remediation Plan that includes worker safety measures if results of investigations completed indicate the presence of hazardous materials; 3) preparation of a

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<sup>1</sup> California Department of Toxic Substances Control, 2011. EnviroStor Database. Website: [www.envirostor.dtsc.ca.gov/public/default.asp](http://www.envirostor.dtsc.ca.gov/public/default.asp) (accessed July 20).

project-specific Health and Safety Plan that includes worker health and safety provisions where hazardous materials are known or suspected; 4) preparation of a contingency plan for sampling and analysis of previously unknown hazardous substances; 5) analytical testing (includes sampling and waste characterization) of engineered fill if engineering fill is needed on-site; and 6) performance of a hazardous building materials survey that includes inspections of asbestos, lead-based paint, and sources of universal waste.

Although two schools are located less than ¼ mile north and west of the project site, implementation of Mitigation Measures HAZ-1 and HAZ-2 would prevent any potential contamination from the project site from migrating off-site during construction and reduce this potential impact to a less-than-significant level.

Development of the project site would not involve the routine transport, use, or disposal of significant quantities of hazardous materials. The site is not located within the vicinity of any public use airports or private airstrips. Additionally, because the County's *Campus Emergency Plan Annex to the Health and Human Services Agency Emergency Operations Plan* would be updated as conditions at the campus change, it is not expected that the proposed project would substantially impair access to emergency evacuation routes within the vicinity, including SR 29. Finally, the project site is not within or adjacent to a wildland fire hazard area.

## 6. Hydrology and Water Quality

Construction activities associated with the proposed project would cause disturbance of soil during excavation work, which could adversely impact water quality. Contaminants from construction vehicles and equipment and sediment from soil erosion could increase the pollutant load in runoff being transported to receiving waters during redevelopment. Although surface runoff from the site would likely decrease with the proposed project, runoff from the proposed landscaped areas may contain residual pesticides and nutrients during operation of the project. Long-term degradation of runoff water quality from project operation could adversely affect water quality in the receiving waters and water of San Pablo and San Francisco Bays. Implementation of Mitigation Measures HYD-1a and HYD-1b, which require: 1) the application for coverage under the NPDES General Construction Activity Permit, including the preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP), and 2) the preparation and implementation of a Stormwater Management Plan (SWMP), would reduce potential construction- and operation-period impacts to water quality to a less-than-significant level.

The proposed project could require the reconfiguration of the City's storm drainage infrastructure to accommodate redirected flows. Implementation of Mitigation Measure HYD-2, which requires the preparation of a stormwater flow projection study and a hydraulic capacity study and verification that the existing storm system is properly sized, would ensure that the proposed project would not exceed the capacity of the City's storm drain system.

Development of the project would generally retain the existing amount of greenspace and pervious surfaces on the site, although the location of these areas may be reconfigured. Therefore, the proposed project would have a less-than-significant impact related to on- or off-site flooding. The proposed project would not alter the course of a stream or a river because the project site is in an urban area and redevelopment of the site would result in only minor alterations to the drainage pattern. Compliance with construction- and operation-phase stormwater requirements (Mitigation Measures HYD-1)

would further ensure that development of the project would not result in substantial erosion or siltation on- or off-site.

The proposed project would connect to the City's water system and would not use groundwater at the site. The project would not place housing or other structures within a 100-year flood hazard zone; would not pose a significant risk to people or structures as a result of levee or dam failure; and would not be subject to inundation by a seiche, tsunami, or mudflows.

## **7. Land Use and Planning**

Redevelopment of the site would represent a continuation and increased intensity of existing uses on the site and surrounding residential area. Redevelopment of the site would not physically divide the surrounding residential or campus community as the existing boundaries of the campus would not expand into adjacent residential areas or across existing roadways. Therefore, the proposed project would not result in the physical division of an established community or adversely affect the continuity of land uses in the vicinity.

The County's General Plan simply designates the site as "Cities," with no County zoning classification. The City has nominally designated the site as Public Serving (PS) in its General Plan and the site is within the Central Napa Planning Area. The site is also within the City's Public, Quasi-Public (PQ-P) zoning district. This PQ-P district is intended for public and quasi-public uses which, because of their size, location and significance are designated PS in the General Plan. The City's authority to regulate land use activities of other government entities is limited by State and federal law. The County's General Plan, Policy CC-12 states that "development projects on County-owned sites within the incorporated cities/town shall be designed to be visually compatible with their surroundings in terms of use, scale, and materials." Refer to the Initial Study in Appendix B for a discussion of the project's consistency with the County's General Plan Policy CC-12. The proposed project represents a continuation of the site's current use as a County facility, specifically as the HHSA campus. Redevelopment of the HHSA campus with expanded facilities would generally be consistent with the General Plan and zoning regulations of the County and the City of Napa, where applicable. Therefore, the project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

## **8. Mineral Resources**

The project site is located in an urban area within the City of Napa and is not located near existing mineral recovery sites located throughout the County of Napa. Therefore, there would be no impacts to mineral resources.

## **9. Population and Housing**

The proposed project would redevelop the existing HHSA campus, and does not include new homes or businesses and would not result in the extension of new roads or other major infrastructure, such that direct population growth would result. No housing is located on the site. The proposed project is intended to accommodate an increase in staffing of 350 employees and number of clients over the next 20 years. The Association of Bay Area Governments (ABAG) projects approximately 16,000

jobs will be created in the County between 2010 and 2030.<sup>2</sup> Of those total jobs, approximately 6,280 will be created in the City of Napa. The increase in employment at the campus represents a relatively small contribution to the overall job growth projected for the County and City. Because this increase would be relatively small, this impact would be considered less-than-significant, and the proposed project would neither directly nor indirectly lead to substantial or unforeseen economic or population growth.

## 10. Public Services

The proposed project would be adequately served by existing public services, such as police and fire protection services. Because the proposed project does not include housing, the proposed project would not result in an adverse effect on school facilities. The project may incrementally increase use of area parks and community and regional recreational facilities; however, this increase is not expected to result in substantial physical deterioration of local parks and recreational facilities. Therefore, the proposed project would not result in an adverse effect on police, fire, school, or recreational services and would not require the construction of new facilities.

## 11. Recreation

The proposed project is the redevelopment of the existing HHS campus and does not include or require construction or expansion of existing public recreation facilities. The proposed project also does not include housing, and therefore would not directly increase the use of local parks. If the adjacent sport field is acquired for campus expansion, the sports field would no longer be available for use by students at the Napa Junior Adventist Academy. However, this recreational area is not considered as a public facility as it is part of a private school. Therefore, the removal of this facility would not increase the use of recreational facilities in the area.

## 12. Utilities and Service Systems

The proposed project is an infill redevelopment project located in an urban area already served by existing utility systems. The proposed project would need to install and/or upgrade the following utility connections to the satisfaction of the applicable utility providers: water, wastewater, storm-water drainage, power, and telecommunications services.

Given the increased density and building heights that would occur with the proposed project, existing water lines within the project vicinity may not have adequate capacity to serve the project; however implementation of Mitigation Measure UTL-1, which requires the preparation of a detailed water pipe hydraulic flow analysis, would ensure that water infrastructure would adequately serve the proposed project.

Given the increase in intensity of use on the project site, the existing sewer infrastructure within the project vicinity may not be adequately sized to serve the increase in wastewater generated by the proposed project; however implementation of Mitigation Measure UTL-2, which requires the preparation of a sewer flow projection study and a hydraulic capacity study, would ensure that sewer infrastructure would adequately serve the proposed project.

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<sup>2</sup> Association of Bay Area Governments, 2009. *Building Momentum, San Francisco Bay Area Population, Household, and Job Forecasts*.

Implementation of Mitigation Measure HYD-2 would also ensure that potential impact to the storm drainage system would be reduced to a less-than-significant level.

The proposed project would increase water demand, wastewater generated, and solid waste; however, these increases could be met by existing service providers.

## **B. GROWTH-INDUCING IMPACTS**

This section summarizes the project's growth-inducing impacts on the surrounding community. According to CEQA, a project is typically considered growth-inducing if it would foster substantial economic or population growth. Examples of projects likely to have significant growth-inducing impacts include extensions or expansions of infrastructure systems beyond what is needed to serve project-specific demand, and development of new residential subdivisions or industrial parks in areas that are currently only sparsely developed or are undeveloped. Typically, projects on infill sites that are surrounded by existing urban uses are not considered growth-inducing because the re-use of land by itself usually does not facilitate development intensification on adjacent sites.

Implementation of the proposed project would not result in direct population growth because the proposed project does not include the development of new housing units. However, the project could indirectly increase the area's population through an expansion of employment. Nevertheless, overall indirect population growth associated with the project would not be considered significant when evaluated on a regional or sub-regional level.

There are currently approximately 323 employees at the campus and redevelopment of the campus is intended to accommodate an additional 350 employees and number of clients over the next 20 years. The Association of Bay Area Governments (ABAG) projects approximately 16,000 jobs will be created in the County between 2010 and 2030.<sup>3</sup> Of those total jobs, approximately 6,280 will be created in the City of Napa. The increase in employment at the campus represents a relatively small contribution to the overall job growth projected for the County and City. Because this increase would be relatively small, the regional supply of housing would be expected to accommodate this increase in demand for housing that could result from redevelopment of the campus over a 20-year period. As such, the proposed project would neither directly nor indirectly lead to substantial or unforeseen economic or population growth.

Additionally, the project site consists of infill redevelopment within an existing urbanized area and would not require the extension of utilities or roads into undeveloped areas or directly or indirectly lead to the development of greenfield sites. Due to the location of the project site and presence of existing uses on and in the vicinity of the site, construction of the proposed project would not induce unplanned growth in the area. Therefore, the growth that would occur as a result of the proposed project would not be considered substantial or adverse.

The 3.25-acre site sports field site which is part of the Expanded Site Option is designated Single Family Infill (SFI-147) on the City of Napa General Plan Map and is also within the City's Single Family Infill (RI-15) zoning district. If the County moves forward with the Existing Site Option and

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<sup>3</sup> Association of Bay Area Governments, 2009, op. cit.

does not acquire the sports field site, under the existing zoning, the sports field could be sold and developed with residential uses. However, this would not represent a growth-inducing impact of the project as it would be a decision made by the Northern California Conference Association of Seventh Day Adventists, the corporation which owns the Napa Junior Adventist Academy campus, and not the County.

### C. SIGNIFICANT UNAVOIDABLE ENVIRONMENTAL IMPACTS

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 Infirmary Historic District. Mitigation Measures CULT-3a and CULT-3b would reduce the severity of these impacts, but not to a less-than-significant level. Therefore, this impact would be significant and unavoidable.

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:

- 1<sup>st</sup> Street/Freeway Drive;
- 1<sup>st</sup> Street/California Boulevard;
- 2<sup>nd</sup> 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.

If fully-funded and programmed, implementation of the multi-part Mitigation Measure TRANS-3 (TRANS-3a through TRANS-3i) would reduce cumulative impacts to these intersections to a less-than-significant level. However, the proposed project would only be responsible for its “fair-share” contribution. Because the balance of funding is not in place, the cumulative impact to these intersections would be significant and unavoidable.

### D. SIGNIFICANT IRREVERSIBLE CHANGES

An EIR must identify any significant irreversible environmental changes that could result from implementation of a proposed project. These may include current or future uses of non-renewable resources and secondary or growth-inducing impacts that commit future generations to similar uses. CEQA dictates that irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.<sup>4</sup> The *CEQA Guidelines* describe three distinct categories of significant irreversible changes: 1) changes in land use that would commit future generations; 2) irreversible changes from environmental accidents; and 3) consumption of non-renewable resources.

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<sup>4</sup> *CEQA Guidelines*, Section 15126.2(c).

## **1. Changes in Land Use Which Commit Future Generations**

The proposed project is the redevelopment of the existing HHSA campus. Implementation of the proposed project would be on a site that already contains public facility uses, and future uses would be identical to existing uses under the Existing Site Option. With the Expanded Site Option, the existing sports field use would transition to use as part of the HHSA campus. The HHSA site has been developed with urban (health/social service) uses for at least the last 90 years. The proposed project would result in an increase in the density and intensity of development at the project site by about 98,205 square feet over a 20-year period and the County's investment would commit future generations to continued use of the project site in the future.

## **2. Irreversible Damage from Environmental Accidents**

No significant irreversible environmental damage, such as what could occur as a result of an accidental spill or explosion of hazardous materials, is anticipated due to development of the proposed project. Compliance with federal, State, and local regulations and the mitigation measures identified in Section VIII, Hazards and Hazardous Materials of the Initial Study, would reduce the possibility that hazardous substances within the project site would cause significant environmental damage to a less-than-significant level. The project has no design or operational features that would lead to irreversible damage associated with environmental accidents.

## **3. Consumption of Nonrenewable Resources**

Consumption of nonrenewable resources includes conversion of agricultural lands, loss of access to mining reserves, and non-renewable energy use. The project site is located within an urbanized area in the City of Napa. No agricultural lands exist on the project site; therefore none would be converted to non-agricultural uses. As previously described, the project site is not located near existing mineral recovery sties located throughout the County of Napa. The project would therefore not result in the loss of availability of a known mineral resource of value locally or to the region or State. In addition, the project site is not identified in a planning document as being a locally-important mineral resource recovery site.

Construction of the proposed project would require the use of energy, including energy produced from non-renewable resources. Energy consumption would also occur during the operational period of the proposed project. The proposed project would incorporate green building features on the project site and buildings, including but not limited to: drought tolerant landscaping; vegetative swales and permeable paving (to control and treat storm water runoff); daylighting and shading strategies; energy efficient mechanical systems; use of recycled and recyclable materials; and, water-saving plumbing fixtures.

As discussed in the Section IV.E, Greenhouse Gas Emissions, the proposed project would not result in significant impacts associated with construction- and operational-related greenhouse gas emissions, and would not conflict with plans adopted for the purpose of reducing GHG emissions. Additionally, the proposed project would not require the construction of major new lines to deliver energy as electric service is already provided in the area. Therefore, the proposed project would not result in a significant impact associated with the consumption of nonrenewable resources.