3 RESPONSES TO COMMENTS ON THE DEIR

This chapter contains comment letters received during the public review period for the DEIR, which concluded on September 30, 2013, including transcribed comments received during the September 18, 2013 public hearing. In conformance with Section 15088(a) of the State CEQA Guidelines, written responses were prepared addressing comments on environmental issues received from reviewers of the DEIR.

Two public hearings to receive comments on the DEIR were held on September 18, 2013. The first public hearing was held during the regular meeting of the Napa County Planning Commission at 9 a.m., and the second public hearing was held at the Hall of Justice at 6 p.m. The first public hearing was recorded and a transcript was prepared. No public comments were received at the second public hearing.

3.1 LIST OF COMMENTERS ON THE DEIR

Table 3-1 below indicates the numerical designation for each comment letter received, the author of the comment letter, and the date of the comment letter.

<table>
<thead>
<tr>
<th>Letter #</th>
<th>Commenter</th>
<th>Date of Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>S1</td>
<td>California Department of Transportation</td>
<td>September 30, 2013</td>
</tr>
<tr>
<td>L1</td>
<td>Napa County Local Agency Formation Commission</td>
<td>August 19, 2013</td>
</tr>
<tr>
<td>L2</td>
<td>City of Napa Community Development Department, Planning Division</td>
<td>September 30, 2013</td>
</tr>
<tr>
<td>L3</td>
<td>Napa Sanitation District</td>
<td>September 30, 2013</td>
</tr>
<tr>
<td>B1</td>
<td>Syar Industries, Inc.</td>
<td>September 30, 2013</td>
</tr>
<tr>
<td>B2</td>
<td>Cakebread Cellars</td>
<td>September 30, 2013</td>
</tr>
<tr>
<td>I1</td>
<td>Bruce Graham</td>
<td>September 24, 2013</td>
</tr>
<tr>
<td>I2</td>
<td>Joe Carter</td>
<td>September 20, 2013</td>
</tr>
<tr>
<td>PH1</td>
<td>9 a.m. Public Hearing on the DEIR</td>
<td>September 18, 2013</td>
</tr>
</tbody>
</table>

3.2 COMMENTS AND RESPONSES ON THE DEIR

The verbal and written individual comments received on the DEIR and the responses to those comments are provided below. The comment letters and verbal comments made at public meetings are reproduced in their entirety and are followed by the response(s). Where a commenter has provided multiple comments, each comment is indicated by a line bracket and an identifying number in the margin of the comment letter.
September 30, 2013

Mr. Brian Bordona
Napa County Planning, Building, and
Environmental Services Department
1195 Third Street, Suite 210
Napa, CA 94559

Dear Mr. Bordona:

County Jail and Ancillary Facilities Project – Draft Environmental Impact Report

Thank you for continuing to include the California Department of Transportation (Caltrans) in the environmental review process for the above project. The following comments are based on the Draft Environmental Impact Report.

**Traffic Impact Study**
1. The Traffic Impact Study must include the analysis whether the Existing left-turn storage length for the following study intersections can accommodate additional project volumes under Existing and Future Plus Project conditions:
   a. #5, State Route (SR) 121 West Imola Avenue/SR 221 Soscol Avenue
   b. #7, SR 221/Streebly Drive
   c. #8, SR 221/Project Access
2. Turning Movement Traffic per Study Intersection under 2030 Cumulative + Project Conditions (page 3.9-13): Exhibit 3.9-5 *Future Project Trips* seems to demonstrate the projected turning movement traffic per study intersection under Cumulative Conditions. Please verify “Future Year” is same as “2030 Cumulative.” Please provide turning movement traffic diagram per study intersection under 2030 Cumulative + Project Conditions for our further review.

**Highway and Traffic Operations**
1. All project site access modifications, lane configuration changes on SR 221, and mitigation measures must be approved and coordinated with Caltrans.
2. Please provide plans and specifications for all modifications within the state right of way.
3. Please provide a copy of the Traffic Management Control Plan for review.

“Caltrans improves mobility across California”
Mr. Brian Bordona/County of Napa  
September 30, 2013  
Page 2

Please feel free to call or email Sandra Finegan at (510) 622-1644 or sandra_finegan@dot.ca.gov 
with any questions regarding this letter.

Sincerely,

[Signature]

ERIK ALM, AICP  
District Branch Chief  
Local Development – Intergovernmental Review  
c: State Clearinghouse

“Caltrans improves mobility across California”
The commenter requests analysis of whether the existing left-turn storage length can accommodate additional project volumes under Existing and Future Plus Project conditions for the following study intersections: Soscol Avenue - State Route (SR) 221/SR 121-Imola Avenue, SR 221/Streblow Drive, and SR 221/Main Access. No left-turning project trips were assigned to SR 221/Streblow Drive; however, due to the potential impact on the storage length associated with adding traffic to the through movements on SR 221, this intersection as well as the two others identified by the commenter were evaluated to determine queue lengths without and with the project. The projected vehicle queues were estimated using the applied timing schemes in SIMTRAFFIC, which is a traffic simulation extension of SYNCHRO. SIMTRAFFIC generates random “seeding” of vehicles on the street network and then simulates how vehicles will flow through the system using the actual volumes, phasing, and timing developed in SYNCHRO. Because each SIMTRAFFIC run is unique, a series of five separate “runs” was used to develop queuing estimates. The maximum queues projected for each lane in the five SIMTRAFFIC runs were averaged and are then reported. The results are summarized below in Tables 3-2 and 3-3. As indicated in the tables, the addition of project trips is not expected to cause or contribute to excessive queuing conditions under existing or future conditions except that queuing is expected to exceed available storage length in the left-turn lane on the northbound approach to Soscol Avenue-SR 221/SR 121-Imola Avenue under future conditions either without or with the project. Because the proposed project would increase the queuing by only 3 feet, which is considerably less than a car length, this additional queuing is considered a less-than-significant impact. The City may wish to consider extending the northbound left-turn lane on SR 221 at Soscol Avenue-SR 221/SR 121-Imola Avenue as part of future plans to improve the intersection. The payment of a proportional share of the costs of these future improvements, as identified in Mitigation Measure 3.9-1a, would offset the project’s minimal impact on the queuing.

Table 3-2 Existing and Existing plus Phase II Intersection Queuing Results

<table>
<thead>
<tr>
<th>Intersection</th>
<th>Northbound</th>
<th>Southbound</th>
<th>Eastbound</th>
<th>Westbound</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>L</td>
<td>T</td>
<td>L</td>
<td>T</td>
</tr>
<tr>
<td>5. Soscol Ave-SR 221/SR 121-Imola Ave</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Available Storage</td>
<td>450</td>
<td>750</td>
<td>130</td>
<td>2,810</td>
</tr>
<tr>
<td>Maximum Queue</td>
<td>AM</td>
<td>146/209</td>
<td>215/200</td>
<td>151/142</td>
</tr>
<tr>
<td>7. SR 221/Streblow Drive</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Available Storage</td>
<td>500</td>
<td>750</td>
<td>130</td>
<td>2,810</td>
</tr>
<tr>
<td>Maximum Queue</td>
<td>AM</td>
<td>201/186</td>
<td>55/84</td>
<td>267/154</td>
</tr>
<tr>
<td></td>
<td>PM</td>
<td>127/100</td>
<td>173/131</td>
<td>348/237</td>
</tr>
<tr>
<td>8. SR 221/Main Access</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Available Storage</td>
<td>-/</td>
<td>2,550</td>
<td>270</td>
<td>340</td>
</tr>
<tr>
<td>Maximum Queue</td>
<td>AM</td>
<td>-/</td>
<td>36/62</td>
<td>-/</td>
</tr>
<tr>
<td></td>
<td>PM</td>
<td>-/</td>
<td>16/41</td>
<td>-/</td>
</tr>
</tbody>
</table>

Notes:
1. SSSC = Side Street Stop-Controlled
2. Queuing results by scenario are shown as Existing/Existing plus Phase II
3. Queuing results are in feet
4. Bold text indicates that project trips contribute to queues and exceed available storage
5. Source: Data provided by Whitlock & Weinberger Transportation, Inc. in 2013
<table>
<thead>
<tr>
<th>Intersection</th>
<th>Northbound</th>
<th>Southbound</th>
<th>Eastbound</th>
<th>Westbound</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>L</td>
<td>T</td>
<td>L</td>
<td>T</td>
</tr>
<tr>
<td>5. Soscol Ave-SR 221/SR 121-Imola Ave</td>
<td>Available Storage</td>
<td>450</td>
<td>750</td>
<td>130</td>
</tr>
<tr>
<td>Maximum Queue</td>
<td>AM</td>
<td>294/259</td>
<td>269/353</td>
<td>136/146</td>
</tr>
<tr>
<td>PM</td>
<td>471/474</td>
<td>627/747</td>
<td>140/141</td>
<td>1,202/1,955</td>
</tr>
<tr>
<td>7. SR 221/Streblow Drive</td>
<td>Available Storage</td>
<td>310</td>
<td>500</td>
<td>-/-</td>
</tr>
<tr>
<td>Maximum Queue</td>
<td>AM</td>
<td>195/226</td>
<td>117/114</td>
<td>-/-</td>
</tr>
<tr>
<td>PM</td>
<td>131/132</td>
<td>206/166</td>
<td>-/-</td>
<td>401/409</td>
</tr>
<tr>
<td>8. SR 221/Main Access</td>
<td>Available Storage</td>
<td>-/-</td>
<td>2,550</td>
<td>270</td>
</tr>
<tr>
<td>Maximum Queue</td>
<td>AM</td>
<td>-/-</td>
<td>33/71</td>
<td>9/23</td>
</tr>
<tr>
<td>PM</td>
<td>-/-</td>
<td>5/51</td>
<td>-/-</td>
<td>-/-</td>
</tr>
</tbody>
</table>

Notes:  
1. SSSC = Side-Street Stop-Controlled  
Queueing results by scenario are shown as Future/Future plus Phase II  
Queueing results are in feet  
Bold text indicates that project trips contribute to queues and exceed available storage  
Source: Data provided by Whitlock & Weinberger Transportation, Inc., 013

Because of the random seeding of vehicles as well as the optimization of timing for each scenario, it is not unusual to obtain better results for “plus project” conditions compared to without the project, which is the case for many of the results indicated in the tables. While this would appear to indicate an improvement, it should instead be recognized as a highly variable analysis for comparative purposes that indicates that the project will generally result in similar queuing, but not any significant increases, which are defined as being at least one car length, or 20 feet.

S1-2 The commenter requests verification that DEIR Exhibit 3.9-5, “Future Project Trips,” shows 2030 cumulative conditions, and requests that a diagram be provided that shows turning movement traffic under 2030 Cumulative + Project Conditions. DEIR Exhibit 3.9-5 was incorrectly labeled as “Future Project Trips.” To provide clarification, the title is revised as follows:

Exhibit 3.9-5a, “Future [Without Project] Trips”

As noted on page 3.9-13 of the DEIR, the horizon year for the “Future Conditions” scenario is 2030. In response to this comment, a new exhibit (Exhibit 3.9-5b) has been created to show Future plus Project (Phase II) volumes, as requested.

S1-3 The commenter notes that all project site access modifications, lane configuration changes on SR 221, and mitigation measures must be approved and coordinated with the California Department of Transportation (Caltrans). The comment is noted. The County of Napa (County) plans to continue coordinating with Caltrans through project design.

S1-4 The commenter requests that plans and specifications for all modifications within the state right of way be provided to Caltrans. The comment is noted. Plans and specifications for off-site improvements will be developed as part of a future stage of project design.
Future (Plus Project) Trips
The commenter requests a copy of the Traffic Management Control Plan. Mitigation Measure 3.9-3 on page 3.9-33 of the DEIR requires that the County prepare a construction Traffic Management Plan in consultation with the applicable transportation entities, including Caltrans for state roadway facilities and the City of Napa. A copy of the construction Traffic Management Plan will be provided to Caltrans prior to the start of project construction.
Hi Brian,

Please accept this email as Napa LAFCO's comments on the County of Napa's Draft Environmental Impact Report (DEIR) for the County Jail Project circulated for public review on August 16, 2013. Napa LAFCO's comments -- as contemplated in the DEIR -- are premised on our potential role as a responsible agency under CEQA with respect to two separate approval areas tied to project implementation. These potential approvals involve (a) sphere of influence amendments to add the project site to the City of Napa and Napa Sanitation District's spheres of influence and (b) outside service extensions for the City of Napa and Napa Sanitation District to provide water and sewer service, respectively, to the project site.

With the preceding premise in mind, the attached document identifies in track-change form suggested corrections and/or edits in anticipation of the County preparing a Final EIR. These comments are limited to two sections of the DEIR: “Executive Summary” and “Project Description.” LAFCO respectfully refers to the City of Napa and Napa Sanitation District to first review and comment on the analyses in the DEIR with regard to these agencies abilities to accommodate projected water and sewer service demands, respectively, to the project before considering any formal comments on our end.

Additionally, and on a related topic, please note Napa LAFCO is in the process of preparing our five year sphere of influence updates for both the Napa Sanitation District and City of Napa as required under G.C. Section 56425. Given the existence of the DEIR, I have listed the project site as a study area for possible addition to both agencies’ spheres for purposes of facilitating either an annexation (Napa Sanitation District) or outside service extension (City of Napa). It is not known at this time when the Commission will actually take action on the sphere updates, but it would be advisable for the County to remain alert to these pending updates and address the status as appropriate in the DEIR/FEIR.

On behalf of Napa LAFCO, thank you for the opportunity to provide comments on the DEIR. Should you have any questions or related follow up, please contact me by telephone or e-mail at your convenience.

Warmly,

Keene

Keene Simonds, Executive Officer
Local Agency Formation Commission of Napa County
Subdivision of the State of California
1030 Seminary Street, Suite B
Napa, California 94559

Like Us
Ascent Environmental
Responses to Comments on the DEIR

www.napa.lafco.ca.gov
(707) 259-8645 Telephone

cc: Boz Wagenknecht, LAFCO Chair
    Jackie Gong, LAFCO Counsel
    Tim Healy, Napa Sanitation District
    Rick Tooler, City of Napa
    Larry Flexin, County of Napa
NAPA LAFCO COMMENTS
COUNTY JAIL PROJECT DEIR

Submitted by Keene Simonds, Executive Officer
August 19, 2013

EXECUTIVE SUMMARY SECTION

POTENTIAL APPROVALS AND PERMITS REQUIRED
The County is the lead agency, as defined by CEQA, for this EIR, and has the principal responsibility for ensuring that the requirements of CEQA have been met. After the EIR public review process is complete, the Board is the party responsible for certifying that the EIR adequately evaluates the environmental impacts of the County Jail Project. The Board has the authority to either approve or reject the County Jail Project.

Permits and approvals may be required from the following state and local agencies for construction of the proposed project:

STATE
- Bay Area Air Quality Management District: Authority to construct (for devices like emergency generators that emit air pollutants); permit to operate.
- Board of State and Community Corrections: Compliance with adult Title 15 Regulations, and possible additional consultation if required.
- California Department of Fish and Wildlife, Region 3: Possible consultation.
- California Department of Transportation, District 4: Encroachment permit.
- San Francisco Bay Regional Water Quality Control Board: National Pollutant Discharge Elimination System (NPDES) construction stormwater permit (Notice of Intent to proceed under General Construction Permit) for disturbance of more than 1 acre, discharge permit for stormwater, and Clean Water Act Section 401 water quality certification or waste discharge requirements.

LOCAL
- City of Napa: Water service and related infrastructure plans.
- Napa County Local Agency Formation Commission: Sphere amendment (City and Napa Sanitation District) and outside service extensions (City and Napa Sanitation District).
- Napa Sanitation District: Wastewater services and related infrastructure plans.
PROJECT DESCRIPTION SECTION

2.4.5 UTILITIES AND SERVICE SYSTEMS

The project would include extension of utility infrastructure to the new jail site for water, wastewater, electricity, and natural gas. It is assumed that water and wastewater extensions would connect to existing underground pipes immediately west of SR 221. Existing electrical and natural gas infrastructure are available for both parcels, although upgrades would be necessary to accommodate the project’s increased demand.

Exhibit 2-9 shows the project site in relation to the City’s and the Napa Sanitation District’s (NSD) spheres of influence (SOI). Approval of sphere of influence (SOI) amendments by the Napa County Local Agency Formation Commission (LAFCO) would be needed to add the project site to the City and the NSD SOI in order for either agency to provide water and sewer services, respectively, through a subsequent amendment or outside service extension approval. It is the explicit expectation of this document that the project will be served by outside service extensions given the County desires to maintain land use control over the site going forward.

WATER

The project site is located outside the jurisdictional boundary and SOI of the City of Napa, which provides potable water service to the surrounding central county region. The proposed project would require an amendment to the City’s SOI and connection to the City’s water system through a subsequent outside service extension approval, all of which would require separate LAFCO approval. The closest potential connection point is an abandoned fire service location on the east side of SR 221 across from the project site (see Exhibit 3.10-1 in Section 3.10, “Utilities and Service Systems”). The proposed project includes trenching and installing pipelines under SR 221 to connect the project site to the City’s water system.

Domestic water is currently supplied to the project site from a private water system that uses local groundwater wells. The proposed project would not use groundwater (including these existing wells) for its water supply needs. Depending on the final site configuration selected, the existing groundwater wells would be avoided and or decommissioned in accordance with applicable state and county requirements.

1 LAFCO approval factors for SOI amendments are outlined under Government Code 56325. LAFCO approval factors for amendments are outlined under Government Code 56325. LAFCO approval factors for outside service extensions are outlined under 56333.
WASTEWATER

The project site is located outside of the jurisdictional boundary and SOI of the NSD. The proposed project would require an amendment to NSD’s SOI and connection to the NSD wastewater collection and treatment system through a concurrent or subsequent outside service extension approval, all of which require separate LAFCO approvals. The closest potential connection point is between the Napa River and SR 221, parallel and adjacent to the Southern Pacific railroad track, approximately 0.6 mile from the project site (see Exhibit 3.10-1 in Section 3.10, “Utilities and Service Systems”). A new connection could be established through two routes: along Strublow Road to connect to the Napa Municipal Golf Course or along Basalt Road to connect near Enterprise Court (see Exhibit 3.10-1). A connection through Strublow Road would be approximately 0.5 mile long, and a connection along Basalt Road would be approximately 0.3 mile long. The specifics of the feasibility of these routes would be determined during detailed project design; however, connections would be made through existing roadways, and would require the County or NSD to obtain right-of-way and easements from relevant agencies (e.g., Caltrans, City of Napa). The environmental impacts of both of these routes are evaluated in this DEIR.

Currently, the Pacific Coast parcel is served by an onsite septic system with a 1,500-gallon concrete septic tank with sanitary waste capacity of 225 gallons per day (gpd). The system is located at the property line between the Pacific Coast and Boca parcels within an undeveloped area. The details of any septic system on the Boca parcel are unknown at this time. Depending on the final site configuration selected, the existing septic system(s) would be avoided or decommissioned in accordance with applicable state and county requirements.
2.5 POTENTIAL APPROVALS AND PERMITS REQUIRED

Several agencies will be involved in the consideration of proposed project elements. As the lead agency under CEQA, Napa County is responsible for considering the adequacy of the EIR and determining if the overall project should be approved.

Permits and approvals may be required from the following state and local agencies for construction of the proposed project:

State
- Bay Area Air Quality Management District: Authority to construct (for devices like emergency generators that emit air pollutants); permit to operate.
- Board of State and Community Corrections: Compliance with adult Title 15 Regulations, and possible additional consultation if required.
- California Department of Fish and Wildlife, Region 3: Possible consultation.
- California Department of Transportation, District 4: Encroachment permit.
- San Francisco Bay Regional Water Quality Control Board: NPDES construction stormwater permit (Notice of Intent to proceed under General Construction Permit) for disturbance of more than 1 acre, discharge permit for stormwater, and Clean Water Act Section 401 water quality certification or waste discharge requirements.

Local
- City of Napa: Water service and related infrastructure plans.
- Napa County Local Agency Formation Commission: Shore amendments (City and NSD) and provide service extensions (City and NSD).
- Napa Sanitation District: Wastewater services and related infrastructure plans.
The commenter’s proposed tracked changes (provided as comment L1-3, below) have been incorporated in the Executive Summary and Chapter 2, “Project Description,” of the DEIR as shown below. The text changes proposed by the commenter provide additional detail and clarification related to potential approvals that LAFCO would make regarding project implementation. These changes do not alter the DEIR’s conclusions or any mitigation measures, nor do they require recirculation of the DEIR.

The second to last bullet on page ES-3, under “Potential Approvals and Permits Required” of the DEIR is revised as follows:

- **Napa County Local Agency Formation Commission**: Sphere amendments (City and Napa Sanitation District), and outside service agreement extensions (City and Napa Sanitation District), and extension of water and sewer services to the site.

The second paragraph under Section 2.4.5, “Utilities and Service Systems,” of the DEIR is revised as follows:

Exhibit 2-9 shows the project site in relation to the City’s and the Napa Sanitation District’s (NSD) spheres of influence (SOI). The project site is within the City’s historic water service area, but is not within their SOI; it is not within NSD’s service area or SOI. Approval of an SOI amendments from by the Napa County Local Area Agency Formation Commission (LAFCO) would be needed to add the project site to the City and the NSD SOI for either agency to provide water and sewer services, respectively, to the project site, and these agencies would need to agree to provide their respective services through a subsequent annexation or outside service extension approval. For the City to serve a site outside its jurisdictional boundaries, LAFCO would also have to approve an outside service agreement pursuant to California Government Code Section 56133. This could be done concurrently with the SOI expansion. It is the explicit expectation of this DEIR that the proposed project will be served by outside service extensions and that the site will not annex into the City of Napa.

The second paragraph on page 2-19 under “Water” of the DEIR is revised as follows:

The project site is located outside of the jurisdictional boundary and the sphere of influence SOI of the City of Napa, which provides potable water service to the surrounding central county region. The proposed project would require an amendment to the City’s sphere of influence SOI and connection to the City’s water system through a subsequent outside service extension approval; all of which would require separate LAFCO approvals. The closest potential connection point is an abandoned fire service location on the east side of SR 221 across from the project site (see Exhibit 3.10-1 in Section 3.10, “Utilities and Service Systems”). The proposed project includes trenching and installing pipelines under SR 221 to connect the project site to the City’s water system.

\[\text{LAFCO approval factors for SOI amendments, annexations, and outside service extensions are outlined under California Government Code Sections 56425, 56375, and 56133, respectively.}\]
The fourth paragraph on page 2-19 under “Wastewater” of the DEIR is revised as follows:

The project site is located outside of the service area boundaries jurisdictional boundary and the sphere of influence SOI of the NSD. The proposed project would require an amendment to NSD’s boundaries SOI and connection to the NSD wastewater collection and treatment system through a concurrent or subsequent outside service extension approval; all of which would require separate LAFCO approvals. The closest potential connection point is between the Napa River and SR 221, parallel and adjacent to the Southern Pacific railroad track, approximately 0.6 mile from the project site (see Exhibit 3.10-1 in Section 3.10, “Utilities and Service Systems”). A new connection could be established through two routes: along Streblow Road to connect to the Napa Municipal Golf Course or along Basalt Road to connect near Enterprise Court (see Exhibit 3.10-1). A connection through Streblow Road would be approximately 0.5 mile long, and a connection along Basalt Road would be approximately 0.3 mile long. The specifics of the feasibility of these routes would be determined during detailed project design; however, connections would be made through existing roadways, and would require the County or NSD to obtain right-of-way and easements from relevant agencies (e.g., Caltrans, City of Napa). The environmental impacts of both of these routes are evaluated in this DEIR.

The second to last bullet under Section 2.5, “Potential Approvals and Permits Required,” of the DEIR is revised as follows:

► Napa County Local Agency Formation Commission: Sphere amendments (City and NSD), and outside service agreement extensions (City and NSD), and extension of water and sewer services to the site.

L1-2 The commenter’s note about Napa County LAFCO being in the process of preparing its 5-year sphere of influence updates for both the City of Napa and the Napa Sanitation District (NSD) is noted. The County will, as the commenter suggests, remain alert to these pending updates.

L1-3 See response to comment L1-1.
HAND DELIVERED

September 30, 2013

Mr. Brian Bordona
Napa County Planning, Building and Environmental Services Department
1195 Third Street, 2nd Floor
Napa, CA 94559

RE: Draft Environmental Impact Report (DEIR) – County Jail Project

Dear Mr. Bordona,

As a responsible agency under the California Environmental Quality Act (CEQA), the City of Napa has reviewed the Draft Environmental Impact Report (DEIR) for the County Jail Project. The project description contemplates the development of a new County jail facility with the maximum capacity of 526 beds, a staff secure facility with a capacity of 50 to 100 additional inmates, including ancillary facilities to include a storage and maintenance unit, administrative offices, food services, laundry, medical and mental health units, programing rooms, visiting areas, and inmate intake and release on 15 to 20 acres of land currently zoned for industrial uses. The City appreciates this opportunity to provide the following comments on the Project and the DEIR, and anticipates working cooperatively with the County to ensure that the relocation of the County jail within the City continues to promote the quality of life in the City and the County:

The Draft EIR (p.3.2-1) identifies the portion of SR 221 that is adjacent to the project site as not being an Officially Designated State Scenic Highway, although it recognizes it is categorized as "Eligible for Designation". However, this portion of SR 221 is identified in the City of Napa General Plan (LU-1.6, Figure 1-3) as a scenic corridor. The City of Napa’s General Plan contains policies that endeavor to improve the scenic character of this road. The Napa General Plan also identifies the location as a gateway which it seeks to protect. Please clarify and illustrate through photo simulations the visual change that would result from the project to help substantiate the conclusion that the jail facility would not represent a substantial adverse visual change to a prominent gateway to the City of Napa. Also, please provide additional rational for your conclusion that “Light and Glare Impacts” will be less than significant (p.3.2-16). Reliance on the requirements of the California Building Code (CCR, Title 24) is not inconclusive that glare or “skyglow” would be a less than significant impact. It is recommended that a photometric analysis be prepared for the project.

The Land Use section in the Draft EIR (p.3.7-5, p.3.10-1) identifies LAFCO as the agency responsible for approving requests by cities to extend municipal services such as water to areas outside their jurisdictional boundaries. However, it does not identify whether the County has
formed an agreement with the City of Napa for this request to LAFCO and if the City would endorse such a request. Please indicate that it is the intention of the County to submit a "will serve" request to the City. The Draft EIR also does not explain whether other water sources (e.g. ground water) are insufficient to serve the project and why the project does not seek annexation into the City. The Final EIR should address these issues and also include the following statement; the City of Napa Charter Section 180(B) states that the City of Napa may, in its sole discretion, provide City water service for areas or sites outside the RUL and outside the incorporated area of the City of Napa to be used for public service facilities including, but not limited to, fire and police stations and any similar facilities. If the City of Napa agrees to serve City water to the proposed County Jail site, the proposed site must be annexed into the City’s Sphere of Influence. The following requirements would be applicable to the service request and should be considered in the Final EIR:

- Offsite improvements are necessary for water to be served to this property. The service to the property must be connected to the City distribution 8" water main at Streblow Drive. In order to mitigate the impacts to the existing system in this area, the Napa Valley College water service must be looped through to Streblow Drive. This will require the installation of a 6" meter and backflow device on an existing 8" stub to the college campus off Streblow Drive, and the extension of the existing 8" water main on-site and connection to the existing college water system.

- Two connections to this site are required to create an on-site looped system. Location of these connections are to be at sites approved by the City of Napa PW-Water Division. Connections will be master metered to accommodate both domestic and fire uses.

- Under no circumstances will connections directly to the 24-inch transmission main be permitted. No meter or private facilities shall be located within 20 feet of the existing transmission system with the exception of service crossings which shall be encased. Before and during any water facility installations near the transmission main potholing of the existing 24-inch active transmission main and the abandoned 16-inch steel water transmission main are required. Any drilling activities shall require full monitoring of the depth and horizontal locations of the drillhead. At no time shall the drillhead be within three feet of the existing active water transmission facilities.

- Contributions to transmission system improvements including the upgraded 24-inch transmission water main and the Imola Storage Tank that serves this area are necessary to serve the demands of this site.

- No transfer of water connection fee credits from the existing jail site on Main Street downtown Napa to this site will be permitted.

The Draft EIR does not analyze the LOS for the SR 221/Soscol Avenue corridor for existing, existing plus project, future, or future plus project conditions, therefore, the impacts to the LOS of the corridor from the proposed traffic signal at the intersection of SR 221/Main Access are unknown. The SR 221/Soscol Avenue corridor serves a high daily traffic volume, providing communitywide circulation for both the City and County of Napa. Optimization of free flowing traffic on highly used roadways is important to the overall circulation in a community. Regardless of an analysis of the LOS of this corridor, interconnecting the signals from SR 221/Napa Valley Corporate Way to SR 221(Soscol Avenue)/SR 121(Imola Avenue) and implementing a coordinated signal timing plan would assist in optimizing the flow of traffic on
Mr. Brian Bordona  
September 30, 2013  
Page 3 of 3  

this corridor and likely mitigate any potential impact to the corridor’s LOS caused by the signalization of SR 221/Main Access  

We appreciate the opportunity to comment on this DEIR and hope that the County will address the issues raised by the City in this letter. Please feel free to contact me at (707) 257-9530 should you have any questions or comments regarding this letter.  

Sincerely,  

[Signature]  

Ken MacNab,  
Planning Manager,  
Community Development Department  
City of Napa  

c: Rick Tooker, Community Development Director
L2-1 The commenter requests that the DEIR be revised to indicate that the portion of State Route (SR) 221 adjacent to the project site be identified as a scenic corridor per the City of Napa General Plan. Because the project site is located outside of the City of Napa in unincorporated Napa County, the DEIR focuses on relevant policies of the Napa County General Plan rather than of the City of Napa General Plan; however, while the project site is not within the City’s jurisdiction, the portion of SR 221 immediately adjacent to the project site is considered to be a scenic corridor as per the City of Napa General Plan. As such, relevant policies of the City of Napa General Plan have been incorporated as shown below. These changes do not alter the DEIR’s conclusions or any mitigation measures, nor do they require recirculation of the DEIR.

The following text is added on page 3.2-4 of the DEIR immediately following the section titled, “Napa County Viewshed Protection Ordinance”:

**CITY OF NAPA GENERAL PLAN**

The City of Napa General Plan Land Use Element (City of Napa 1998) prescribes the pattern of land use in Napa and sets out the standards for future development and redevelopment. Policies relevant to the proposed project are described below.

- **Policy LU-1.5**: The City shall refine the locations and concept of the key gateways to the city identified in Figure 1-3 [of the City of Napa General Plan], and shall establish gateway and scenic corridor design guidelines for both public and private development to ensure attractive entrances to the city. Greenways, open space, riparian corridors, wetland areas and agricultural land shall be considered as important components when they exist in gateway locations.

- **Policy LU-1.6**: The City shall designate SR 29, SR 121, and SR 221 as scenic corridors. The City shall endeavor to improve the scenic character of these roads through undergrounding of utilities, increased landscaping, street tree planting, and other improvements.

Additionally, the commenter requests that photo simulations be conducted to help substantiate the conclusion that the proposed project would not represent a substantial adverse visual change along SR 221. Photo simulations are included in Chapter 2, “Project Description,” of the DEIR. Specifically, Exhibit 2-6 illustrates a photo simulation of the proposed project on the Pacific Coast parcel, which as described in Chapter 2, “Minor Modifications to the DEIR,” of this FEIR, is the County’s preferred site. While SR 221 is visible in Exhibit 2-6, the photo simulation is not specifically of SR 221. Three viewpoints, considered representative of views of the project site from publicly accessible areas, were selected for evaluation in the DEIR; two of these viewpoints are located along SR 221 (see pages 3.2-6 through 3.2-11 for descriptions of the viewpoints and Exhibits 3.2-1 through 3.2-3). Impacts 3.2-1 through 3.3-3 in the DEIR qualitatively describe the expected visual changes that would result from the proposed project, including those along SR 221 (see page 3.2-15 specifically). Impacts were determined to be less than significant primarily because project construction would replace derelict and deteriorating buildings, with newer more modern structures surrounded by landscaped areas and parking lots. The commenter does not offer any evidence to support a different conclusion; therefore, no further response is provided.
Regarding light and glare, the commenter requests additional rationale for the DEIR conclusion that light and glare impacts would be less than significant as well as the preparation of a photometric analysis. As a result of this comment, Impact 3.2-4, “Light and Glare Impacts,” of the DEIR is revised as shown below. These changes do not alter the DEIR’s conclusions or any mitigation measures, nor do they require recirculation of the DEIR.

Impact 3.2-4, “Light and Glare Impacts,” of the DEIR is revised as follows:

| Impact 3.2-4 | Light and Glare Impacts. | Lighting for the proposed project would be installed primarily along the building perimeter and in the parking lot, which would be similar in appearance to parking lot lighting at Napa Community College, northwest of the project site, and would be angled in towards the facility and perimeter security zones. No high-mast lighting at the project site is proposed. The project site is adjacent to rural land uses to the south and east, and lights installed on the site would be potentially visible from these areas. The new jail facility would be constructed with non-reflective materials similar to those used for the existing jail in Downtown Napa and would be located over 0.5 mile away from residential areas (sensitive to glare). Project construction would be subject to the requirements of the California Building Code (California Code of Regulations, Title 24), including Title 24, Part 6 of the California Code of Regulations. Compliance with the California Code of Regulations, Title 24 lighting and energy requirements would further ensure that light from the proposed project would not spill over to adjacent rural properties. Therefore, this impact is considered less than significant. |

As noted above, nighttime lighting in the vicinity of the project site is generally low and does not produce substantial glare or skyglow. Lighting for the proposed project would be installed primarily along the building perimeter and in the parking lot, which would be similar in appearance to parking lot lighting at Napa Valley Community College to the northwest of the project site. No high-mast lighting at the project site is proposed. The project site is adjacent to rural land uses to the south and east, and lights installed on the site would be potentially visible from these areas.

Similar to the design of the existing jail in Downtown Napa, the County would use exterior lighting that is designed to cast light only where needed, and to cut off glare to offsite areas. Lighting for the proposed project would be installed primarily along the building perimeter and in the parking lot, which would be similar in appearance to existing parking lot lighting at Napa Valley Community College, northwest of the project site. This perimeter lighting would be angled in towards the facility and perimeter security zones. No high-mast lighting is proposed.

The new jail facility would be constructed with similar materials used for the existing jail in Downtown Napa. Because it is essential that the County maintain adequate site security and line-of-sight, non-reflective materials would be used in building design. Therefore, the proposed project would not result in any daytime glare-related impacts. The closest residential areas (sensitive to glare) are located north of the Napa State Hospital (Terrace-Shurtleff area) and west of SR 221 and east of the Napa River (River East area), approximately 0.7 mile and 0.9 mile, respectively, from the project site. Therefore, the project implementation would not result in a substantial increase in nighttime glare that would directly affect residential areas.

Project construction and operation would be subject to the requirements of the California Building Code (CCR, Title 24), which are also adopted as part of the Napa County Building Code.
Mitigation Measure

No mitigation is required.

L2-2 While the DEIR identifies LAFCO as the agency responsible for approving requests by cities to extend municipal services such as water to areas outside their jurisdictional boundaries, the commenter notes that the DEIR does not identify whether the County has formed an agreement with the City for this request and does not disclose if the City would endorse such a request. Although the County has not “formed an agreement” with the City as to the provision of water service to the project site, the preparers of the DEIR consulted with engineers from the City’s Department of Public Works (Water Division) regarding potential water connection locations.

As a result of this comment and to add clarification, the fourth paragraph on page 3.10-15 of the DEIR is revised as follows:

The project site is located within the City’s water service area, but outside the City limits and the City’s sphere of influence. Existing water demands are provided by on-site wells. As shown in Exhibit 3.10-1, the nearest potential water connection to the project site is an abandoned fire service location on the east side of SR 221 across from the project site (Hether, pers. comm., 2013).

As a result of this comment and to add clarification, the third full paragraph on page 3.10-23 under Impact 3.10-1, “Water Supply and Infrastructure Impacts,” of the DEIR is revised as follows:

Water would be piped from a connection point located on the west side of SR 221 for a distance of approximately 0.2 mile (Hether, pers. comm., 2013). The pipeline would be installed along areas that are currently disturbed, including along Basalt Road and under SR 221. Impacts associated with installing the water pipeline would be similar to other earthmoving activities discussed throughout this document and would be mitigated as appropriate through measures described herein. Thus, impacts associated with the environmental effects of installation of a new water pipeline would be less than significant.

As a result of this and to add clarification, the following reference is added on page 8-10 of the DEIR under Section 3.10, “Utilities and Service Systems”:

Hether, Michael J. Associate Civil Engineer. City of Napa Department of Public Works (Water Division), Napa, CA. May 29, 2013—email to Marianne Lowenthal of Ascent Environmental regarding location of transmission mail along State Route 221 and potential water connection locations.

If the proposed project is approved, the County would continue to coordinate with the City regarding a water service extension to the project site, including potential location of infrastructure and payment of
fees. All physical environmental effects of providing water service to the project site have been evaluated in the DEIR.

As a result of this comment, the fourth paragraph under the section titled, “Local Agency Formation Commission,” of the DEIR is revised as follows:

LAFCO is responsible for approving requests by cities and special districts to extend municipal services, such as water or sewer, outside their jurisdictional boundaries by contract or agreement with property owners (Government Code Section 56133). This process is intended to accommodate the logical extension of municipal services when annexation of the affected territory is not available or appropriate. Written requests to authorize an outside service agreement shall be filed with LAFCO’s Executive Officer. It is the County’s intention to submit a “will serve” request to the City to provide water service to the proposed project.

The City of Napa Charter Section 180(B) states that the City may, in its sole discretion, provide City water service for areas or sites outside the Rural Urban Limit and outside the incorporated area of the City to be used for public service facilities, including, but not limited to, fire and police stations and any similar facilities.

These changes do not alter the DEIR’s conclusions or any mitigation measures, nor do they require recirculation of the DEIR.

Further, the commenter states that the DEIR does not explain whether other water sources (e.g., groundwater) are insufficient to serve the project and why the project does not seek annexation into the City. CEQA does not require EIRs to explain why certain project elements (in this case, water supply source) are selected instead of others. The DEIR states on page 2-19 that groundwater, including the existing wells on the project site, would not be used for the project’s water supply needs (see also discussion on page 3.6-16 under “Issues or Potential Impacts not Discussed Further”). Regarding annexation, the County did not propose that the project site be annexed into the City because annexation would require an extension of the Rural Urban Limit by vote which can only be initiated by the City of Napa. In addition, the County plans to continue to provide law enforcement and fire services to the site. The County anticipates that the proposed project will be served by outside service extensions from the City and NSD. See also response to comment L1-1.

L2-3 The commenter notes that the DEIR does not analyze LOS for the SR 221/Soscol Avenue corridor for existing, existing plus project, future, or future plus project conditions, and, therefore, the impacts to the LOS of the corridor from the proposed traffic signal at the intersection of SR 221/Main Access are unknown. The requested analysis is provided below. Arterial LOS was analyzed for the SR 221 corridor assuming that the signals were not coordinated. It was determined that the segment can be expected to operate acceptably at LOS D or better overall under all scenarios evaluated; there would be no degradation in the level of service upon adding the new traffic signal and project-generated traffic except that operation drops from LOS A to LOS B between future and future plus Phase I, which would be acceptable based on Caltrans standards. Therefore, impacts would be less than significant.

Table 3-4 indicates the speeds and resulting levels of service for the facility under each scenario.
### Arterial Level of Service Results

<table>
<thead>
<tr>
<th></th>
<th>AM Peak</th>
<th></th>
<th>PM Peak</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>SR 221 – Napa Vallejo Highway</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Speed</td>
<td>LOS</td>
<td>Speed</td>
<td>LOS</td>
</tr>
<tr>
<td><strong>Existing</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Northbound</td>
<td>44</td>
<td>A</td>
<td>41</td>
<td>B</td>
</tr>
<tr>
<td>Southbound</td>
<td>36</td>
<td>B</td>
<td>33</td>
<td>C</td>
</tr>
<tr>
<td><strong>Existing plus Phase II</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Northbound</td>
<td>44</td>
<td>A</td>
<td>40</td>
<td>B</td>
</tr>
<tr>
<td>Southbound</td>
<td>35</td>
<td>B</td>
<td>34</td>
<td>C</td>
</tr>
<tr>
<td><strong>Future</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Northbound</td>
<td>45</td>
<td>A</td>
<td>40</td>
<td>B</td>
</tr>
<tr>
<td>Southbound</td>
<td>23</td>
<td>D</td>
<td>29</td>
<td>D</td>
</tr>
<tr>
<td><strong>Future plus Phase II</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Northbound</td>
<td>42</td>
<td>B</td>
<td>38</td>
<td>B</td>
</tr>
<tr>
<td>Southbound</td>
<td>26</td>
<td>D</td>
<td>25</td>
<td>D</td>
</tr>
</tbody>
</table>

**Notes:** The segment of SR 221 is a Class I arterial per the Highway Capacity Manual.

**Source:** Data provided by Whitlock & Weinberger Transportation, Inc. in 2013

Additionally, the commenter notes that regardless of an analysis of the LOS of this corridor, interconnecting the signals from SR 221/Napa Valley Corporate Way to SR 221 (Soscol Avenue)/SR 121 (Imola Avenue) and implementing a coordinated signal timing plan would assist in optimizing the flow of traffic on this corridor and likely mitigate any potential impact to the corridor’s LOS caused by the signalization of SR 221/Main Access. The new signal recommended at the Project’s entry would create spacing between signals that would lend itself to coordination. Current technologies allow for coordination to occur either with or without interconnection, or they can be interconnected using wireless technologies. While not required to maintain acceptable operation, Caltrans may wish to consider coordinating the traffic signals along SR 221 once the new signal becomes operational.
September 30, 2013

Mr. Brian Bordona
Supervising Planner
Napa County Conservation, Development and Planning
1195 Third Street, Suite 210
Napa, CA 94559

SUBJECT: Napa Sanitation District Comments on the Napa County Jail Project Draft Environmental Impact Report (DEIR)

Dear Mr. Bordona:

The Napa Sanitation District (NSD) appreciates this opportunity to comment on the Napa County Jail Project Draft Environmental Impact Report (DEIR). NSD serves a population of approximately 80,000 with wastewater collection and treatment services within the City of Napa and nearby unincorporated areas of Napa County. The site of the proposed Napa County Jail Project (Project) is currently not served by NSD.

NSD has reviewed the DEIR and has compiled a list of comments on various aspects of the project related to wastewater collection, treatment, disposal and recycling, as well as public health and water quality impacts. Our comments are provided below:

1. The DEIR should be revised to indicate that the impacts of the additional loading from the Project is not included in the current County General Plan and is therefore not currently accounted for in the District’s collection, treatment, and water recycling facilities master plans. The extent of the impacts on these systems must be determined through a study or studies conducted by the District and funded by the applicant. All costs associated with the identification and mitigation of these impacts must be paid for by the Project Applicant.

2. Under Impact 3.10-2 (page 3.10-24), the report states that the wastewater generation at the new jail would be partially offset by reductions expected at the existing jail site. District code does not allow transfer of capacity from one parcel to another. The District would analyze the impacts of the new jail at full build-out in addition to the capacity of the existing jail without any offset to the collection system and treatment capacity.

3. Mitigation Measure 3.10-2 (page 3.10-25) states that a “decrease in flow” would allow for an increase in capacity at the WWTP (wastewater treatment
To clarify this statement, the collection system capacity is independent of the treatment capacity. Collection system and treatment capacity would both need to be analyzed. See comment #1 above.

NSD’s core business is providing cost-effective wastewater collection and treatment to protect water quality and public health. We take seriously our responsibility to our existing and future ratepayers. While NSD does not take positions on land use matters, it is our responsibility to serve approved development within our boundaries. Thank you for the opportunity to submit comments. Please feel free to contact me at (707) 258-6004 or jjohnson@napasan.com if you have any questions or would like additional information.

Sincerely,

Jennifer Johnson, P.E.
Associate Engineer
L3-1 As a result of this comment, the following text is added on page 3.10-3 of the DEIR following the last paragraph under the section titled, “Napa Sanitation District Management and Planning”:

The potential impacts of the additional loading from the proposed project are not included in NSD’s collection, treatment, and water recycling facilities master plans. The extent of the project’s impacts on these systems will be determined through a study conducted by NSD and funded by the County. All costs associated with the identification and mitigation of these impacts will be paid for by the County.

These changes do not alter the DEIR’s conclusions or any mitigation measures, nor do they require recirculation of the DEIR.

L3-2 As a result of this comment, the fourth full paragraph on page 3.10-24 under Impact 3.10-2, “Wastewater Collection, Conveyance, and Treatment Infrastructure,” of the DEIR is revised as follows:

This would total 56,340 gpd of wastewater generation at full buildout of the project, which would be partially offset by reductions expected at the existing jail site. It should be noted, however, that NSD code does not allow transfer of capacity from one parcel to another. NSD would analyze the impacts of the new jail at full buildout in addition to the capacity of the existing jail, without any offset to the collection system and treatment capacity. Because the wastewater pipelines and the influent pump station are experiencing capacity limitations and the project would contribute to the exacerbation of these capacity limitations, this impact would be significant.

These changes do not alter the DEIR’s conclusions or any mitigation measures, nor do they require recirculation of the DEIR.

L3-3 As a result of this comment, the first paragraph on page 3.10-25 of the DEIR is revised as follows:

Because implementation of Mitigation Measure 3.10-2 will include funding a larger I/I reduction project that would account for twice the demand of the proposed project’s wastewater flows, implementation of this mitigation measure would allow for adequate wastewater collection and conveyance systems associated with the project. In addition, the net decrease in flow would allow for an increase in capacity at the WTTP to serve the project. Construction projects associated with these improvements are similar or identical to those included in the master plans addressing NSD’s treatment and collection systems. The City would complete all necessary environmental review associated with the project; however, pipe repair projects are generally found to be categorically exempt from review under CEQA due to their limited scope and duration. Because construction of or contribution to planned I/I projects will repair/replace existing pipes that have substantial I/I constraints, and are not expected to result in significant secondary impacts, the required mitigation would reduce this impact to a less-than-significant level.

These changes do not alter the DEIR’s conclusions or any mitigation measures, nor do they require recirculation of the DEIR.
Ascent Environmental  Responses to Comments on the DEIR

Napa County
County Jail Project FEIR

SYAR INDUSTRIES, INC.

September 30, 2013

Mr. Brian Bordona
Supervising Planner
Napa County Planning, Building, and
Environmental Services Department
1195 Third Street, Suite 210
Napa, California 94559

Re: Comments on the Draft Environmental Impact Report for the County Jail Project

Dear Mr. Bordona:

Thank you for the opportunity to comment on the Draft Environmental Impact Report for the Napa County Jail Project. As you know, if the Jail Project is located on either the Pacific Coast parcel or the Boca parcel, the Jail Project would share an entrance road with Syar Industries, Inc.’s Napa Quarry. Because the Jail Project has the potential to significantly interfere with the normal operations at the Napa Quarry, we urge the County to carefully review the Jail Project DEIR to ensure that all potential environmental impacts have been identified, carefully considered, and mitigated to the extent possible.

We were disappointed to see that the DEIR does not discuss providing access to the Jail Project site from the existing signaled intersection at SR 221 and Strehlow Drive. Having the Jail Project entrance separated from the Napa Quarry entrance would be the easiest way to mitigate for the many potential environmental impacts identified in the DEIR which result from using the quarry entrance road for the Jail Project. In addition, it would potentially save the County some of the costs of installing a traffic signal, since a signal already exists at the SR 221/Strehlow Drive intersection. We urge the County to give careful consideration to this alternative entrance to the Jail Project site.

We limited our review of the DEIR to Section 3.9, Transportation and Traffic, and have the following comments:

1. On page 3.9-5 under “Study Intersections” item 8 refers to the “Napa-Vallejo Highway (SR221)/Project Access.” However, in Table 3.9-1, item 8 refers to “SR 221/Main Access.” It appears that the DEIR uses the terms “Project Access” and “Main Access” interchangeably, but it is not clear. The DEIR should have a single, consistent phrase to refer to the road between SR 221 and Basalt Road, and that phrase should also be consistent with the description of this road in the Draft Environmental Impact Report for the Syar Napa Quarry Expansion. For clarity, this letter will refer to the road between SR 221 and Basalt Road as the “Entrance Road.”

2. The DEIR should consider the traffic impacts of the Jail Project on two additional intersections: the intersection of the Jail Project site entrance and the Entrance Road (for
Mr. Brian Bordona  
September 30, 2013 
Page 2 of 3

the Pacific Supply Parcel) or Basalt Road (for the Boca parcel); and the intersection of the Entrance Road and Basalt Road, since the Jail Project site entrance for the Boca parcel would require the use of this intersection. Our primary concerns are potential Napa Quarry customer delays as a result of Jail Project traffic, and also how the County will ensure the safety of all users of the Entrance Road and Basalt Road as part of the Jail Project (see item 3 below).

3. The DEIR should consider the specific operational characteristics of the Napa Quarry when considering the potential traffic impacts from the Jail Project, particularly in regards to the “peak hours” used to determine the times of the most severe traffic impacts. The Napa Quarry’s busiest times tend to be in the morning, when customer trucks will be lined up at the quarry gate prior to opening (usually at 6:00 a.m. during the construction season, and 7:00 a.m. during the non-construction season; see Section 3.5.7 of the Napa Quarry DEIR for a complete description of the Napa Quarry’s hours of operation). These intense morning operations are at the same time as the jail custody operations shift changes, according to Table 3.9-5 of the Jail Project DEIR, leading to the potential for traffic congestion. In addition, exiting quarry customer vehicles frequently stop after leaving the quarry and before entering SR 221 to adjust or cover loads, inspect their vehicles, or communicate with fellow truck drivers on the same job. The DEIR needs to analyze the impacts of the Jail Project not just on public roads, but also on the unique uses of the private roads between SR 221 and the Napa Quarry entrance gate.

4. Tables 3.9-5 and 3.9-6 appear to have errors that should be corrected. Both tables provide that “Staff Secure Facility Administrative (8:00 a.m. – 5:00 p.m.)” traffic during the “AM Peak” and the “PM Peak” will be travelling “In.” The “PM Peak” should be indicated as travelling “Out.” This error is also shown on the first two pages of Appendix E, indicating that this erroneous data was used for the traffic modeling. This error should be corrected in the text of the DEIR, and if this erroneous data was used for modeling, the traffic models should be re-run to ensure that the traffic impacts are stated accurately. In addition, in Table 3.9-5 the “Staff Secure Facility Delivery and Service Vehicles” item indicates one delivery but 4 total trips; this should be corrected.

5. The DEIR is inconsistent in its discussion of transit at the Jail Project site. Mitigation Measure 3.9-4b provides that transit will stop in the Jail Project parking lot, and Mitigation Measure 3.9-6 and Table 3.9-14 provide that at full build-out, up to 10% of trips will use alternative transportation, including transit. However, the traffic projections in Tables 3.9-5 and 3.9-6 make no provision for either additional trips from transit vehicles or reduced vehicle trips from the use of transit or other alternative transportation. In addition, while Mitigation Measure 3.9-6 provides that peak parking demand will be reduced because of transit use, it does not discuss how this will occur given the specific timing of shifts changes as compared to transit operation hours. The largest Jail Project shift change will occur at 6:00 a.m. and 6: p.m. every day. However, transit hours are limited on weekend mornings, as shown on page 3.9-10 under “Existing Transit Services and Facilities,” as transit does not start operating on either Saturday (at 6:30 a.m.) or Sunday (at 8:30 a.m.) until well after the shift changes at 6:00 a.m. The DEIR needs to be corrected so that transit is treated consistently and accurately, including in the modeling of traffic impacts.
Ascent Environmental
Responses to Comments on the DEIR

Mr. Brian Bordona  
September 30, 2013  
Page 3 of 3

6. Mitigation Measure 3.9-4a provides for constructing pedestrian and bicycle access at the existing River-to-Ridge Trail. However, there is no discussion of making sure that the River-to-Ridge trail at this location will be improved to accommodate this additional traffic. In particular, the DEIR should provide for paving the River-to-Ridge trail so that it is suitable for use by commuters in all seasons. In addition, the DEIR should discuss the measures the County will take to ensure that pedestrian and bicyclists use this route instead of the Entrance Road. This seems particularly necessary given that Table 3.9-7 provides that more than half of trips to the Jail Project site will come from the south, and it is unclear how pedestrians and bicyclists traveling from the south are going to be directed to travel north a significant distance past the Entrance Road in order to enter the Jail Project site.

7. Mitigation Measures 3.9-5 and 3.9-7 provide for mitigating potential safety impacts at the Jail Project site entrance. However, these mitigation measures only address an entrance at the Pacific Supply parcel. If the Jail Project is located on the Boca parcel, the Jail Project entrance will be from Basalt Road, and Mitigation Measures 3.9-5 and 3.9-7 do not address the Boca parcel and its unique potential safety impacts, including the regular use of Basalt Road by over-sized off-road mobile equipment, as well as the issues discussed in item 3 above.

8. Mitigation Measure 3.9-6 provides there is no impact to parking because the Jail Project will provide one extra parking space as compared to peak parking demand. This seems a very thin margin of safety, in particular given the unsupported assumption that parking demand will be reduced because 10% of trips will use alternative transportation methods. Certainly inclement weather could affect alternative transportation use, particularly bicycling and pedestrians, and any slight increase in parking demand, such as from meetings, training, or emergency situations at the jail, could overwhelm on-site parking availability. Since there would be no off-site parking available in the vicinity of the Jail Project site, the DEIR should reconsider the potential impacts from insufficient parking and ensure that the parking demand of the project is accurately projected and adequately satisfied.

We appreciate the opportunity to provide comment on the Jail Project DEIR. Please contact me or Jennifer Gomez if you have any questions concerning this letter.

Sincerely,

[Signature]

John F. Perry  
Vice President, Engineering

cc: James M. Syar  
Jennifer Gomez

10-02 Letter Jail DEIR 09 10 13.docx
B1-1 The commenter urges the County to carefully review the DEIR to ensure that all potential environmental impacts have been identified, carefully considered, and mitigated to the extent possible. The comment is noted. The County has prepared an Initial Study (see Appendix A of the DEIR), focused DEIR, and this FEIR to evaluate the potential environmental effects of the proposed project. Mitigation measures are identified through the DEIR to reduce, minimize, or avoid significant adverse impacts. The County has concluded that project implementation would result in several impacts related to greenhouse gas emissions and transportation and traffic that cannot be mitigated to a less-than-significant level (i.e., significant and unavoidable impacts); these are described in Section 5.1, “Significant Unavoidable Impacts,” of the DEIR.

B1-2 The commenter expresses disappointment that the DEIR does not discuss providing access to the project site from the existing signalized intersection at SR 221/Streblow Drive. The County did not propose use of this intersection for the reasons presented below. In summary, site access via Streblow Drive was determined to be possible, but not environmentally preferable. The northern portion of the project site, near the intersection of SR 221/Streblow Drive, contains an intermittent stream that provides habitat for common wildlife species; this feature also serves as a natural vegetative buffer between the north end of the site and the existing bike path. Further, this feature would be considered waters of the United States and waters of the state and subject to regulation by the U.S. Army Corps of Engineers (USACE) (see Appendix B, “Biological Resources Technical Memorandum,” of the DEIR). In addition to a USACE wetland permit, use of Streblow Drive for site access would require a Caltrans encroachment permit and permission to create a new street connection to SR 221, an action that is generally seen as undesirable. Due to these permitting and environmental constraints, the County determined that use of Streblow Drive was not the preferred access for the project site.

B1-3 The commenter states that the DEIR should have a single, consistent phrase to refer to the road between SR 221 and Basalt Road. Because there is not an official name for this short segment of road, the terms “Main Access,” “Project Access,” and “Entrance Road” are used interchangeably in the DEIR to refer to the same unnamed roadway.

B1-4 The commenter suggests that the DEIR should consider the traffic impacts of the proposed project on two additional intersections: the intersection of the project site entrance and the Entrance Road (for the Pacific Supply Parcel) or Basalt Road (for the Boca parcel); and the intersection of the Entrance Road and Basalt Road, because the project site entrance for the Boca parcel would require the use of this intersection. Given the amount of traffic currently using Entrance Road, it is reasonable to conclude that under the proposed project, the project driveway connection will operate with acceptable levels of delay. A left-turn lane would be provided for inbound traffic and the outbound traffic would be making a right turn, needing to wait for gaps in westbound traffic only. As described in Chapter 2, “Minor Modifications to the County Jail Project,” of this FEIR, the County has expressed a preference for the Pacific Coast parcel, to which access is intended to be provided by Entrance Road; however, even if access were instead to be provided via the Boca parcel due to the relatively low volume of traffic using this intersection, it would not have been included as a study intersection in the DEIR. By comparison, note that the intersection of Entrance Road with SR 221 was determined to operate acceptably under existing conditions according to the standards applied, and this intersection carries substantially more traffic now than Basalt Road/Entrance Road would carry even if the project access were provided via the Boca parcel.
The commenter suggests that the DEIR should consider the specific operational characteristics of the Napa Quarry when considering the potential traffic impacts from the proposed project, particularly in regards to the “peak hours” used to determine the times of the most severe traffic impacts and the use of the private roads between SR 221 and the Napa Quarry entrance gate.

Based on discussions with the operator of the Syar Napa Quarry following DEIR release, further consideration was given to the need for storage along “Project Access Road” for gravel trucks arriving in the morning to make their first pick-up of the day. Because this queue would form at about the same time that a shift of employees is arriving at the new jail, a striping plan was developed that would provide two separate inbound lanes between SR 221 and the proposed project driveway, thereby separating the streams of traffic destined for the jail and the quarry. This striping layout is shown in Exhibit 3-1. This exhibit provides more detail than was shown in Exhibit 3.9-8 of the DEIR. These changes do not alter the DEIR’s conclusions or any mitigation measures, nor do they require recirculation of the DEIR.

Regarding quarry drivers leaving the site and stopping to adjust or cover loads, there will continue to be space between Basalt Road and the proposed project driveway where trucks could pull to the side for such activities when necessary if issues arise after leaving the quarry site and still leave sufficient width for other trucks or passenger vehicles to pass on the left and continue towards SR 221.

Additionally, further consideration was given to the striping layout shown in Exhibit 3.9-8, “Proposed Signalized Intersection,” in the DEIR. As shown and described in Mitigation Measure 3.9-1b (page 3.9-28 of the DEIR), the free right-turn lanes both inbound to and outbound from the project access road would be converted to standard right-turn lanes. It is understood that such restrictions would result in the heavy volume of truck traffic using these lanes to come to a full stop and then accelerate when approaching a red light, which would represent an adverse impact in terms of their operation. It was determined that the inbound right-turn lane could safely be maintained by adding a yield control. It appears that it would also be possible to maintain the outbound right-turn lane and acceleration lane, though retaining this configuration would conflict with a crosswalk, if one is ever needed. See response to comment B1-8 for further discussion of this issue.

The commenter states that Tables 3.9-5 and 3.9-6 in the DEIR appear to have errors that should be corrected. The commenter is correct in that the p.m. peak hour trips for “Staff Secure Facility Administrative” should be “out” and not “in” in Tables 3.9-5 and 3.9-6 in the DEIR. Thus, there would be 6 more outbound trips and 6 fewer inbound trips in the p.m. peak hour. Regarding the comment that the “Staff Secure Facility Delivery and Service Vehicles” line indicates one delivery but four total trips, it is agreed that this should be corrected to two trips in Table 3.9-5. The numbers of a.m. and p.m. peak hour trips were also modified to reflect the potential for trips during both peaks. Finally, some of the totals were modified to take out the effect of rounding errors.
Responses to Comments on the DEIR Napa County 3-32 County Jail Project FEIR

Exhibit 3-1
Project Access Road Proposed Striping and Signalization
In response to this comment and to provide correction, Tables 3.9-5 and 3.9-6 in the DEIR are revised as follows:

<table>
<thead>
<tr>
<th>Table 3.9-5</th>
<th>Estimated Phase I Trip Generation (366 Beds)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Trip Type</td>
<td>Number of Staff/Visitors/Deliveries</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Employee Trips</strong></td>
<td></td>
</tr>
<tr>
<td>Jail Custody Operations Day Shift (6:00 a.m. – 6:00 p.m.)</td>
<td>25</td>
</tr>
<tr>
<td>Jail Custody Operations Night Shift (6:00 p.m. – 6:00 a.m.)</td>
<td>17</td>
</tr>
<tr>
<td>Jail Custody Operations Business, Administrative, and Support Shifts (8:00 a.m. – 6:00 p.m.)</td>
<td>41</td>
</tr>
<tr>
<td>Staff Secure Facility Administrative (8:00 a.m. – 5:00 p.m.)</td>
<td>6</td>
</tr>
<tr>
<td>Staff Secure Facility Security Team A/C (Days) (6:00 a.m. – 6:00 p.m.)</td>
<td>9</td>
</tr>
<tr>
<td>Staff Secure Facility Security Team B/D (Nights) (6:00 p.m. – 6:00 a.m.)</td>
<td>8</td>
</tr>
<tr>
<td><strong>Employee Trip Total</strong></td>
<td>106</td>
</tr>
<tr>
<td>Staff Secure Facility Program Providers</td>
<td>2</td>
</tr>
<tr>
<td>Staff Secure Facility Inmate Trips1</td>
<td>5</td>
</tr>
<tr>
<td>Jail Visitor Trips2</td>
<td>78</td>
</tr>
<tr>
<td>Staff Secure Facility Visitor Trips2</td>
<td>18</td>
</tr>
<tr>
<td>Jail Delivery and Service Vehicles3</td>
<td>7</td>
</tr>
<tr>
<td>Staff Secure Facility Delivery and Service Vehicles4</td>
<td>1</td>
</tr>
<tr>
<td><strong>Project Totals</strong></td>
<td>217</td>
</tr>
<tr>
<td></td>
<td>434</td>
</tr>
</tbody>
</table>

Notes:
1. Staff Secure Facility Inmate Trips are assumed to occur in vans or other multi-passenger vehicles, with three vehicles each making a round-trip during each peak hour.
2. Visitors include business and professional visitors, volunteers/service providers, and inmate family visits. It is assumed one-quarter of all visitor trips occur during each peak hour.
3. Delivery and Service vehicle trips for the Jail are assumed to have one delivery during each peak hour. All other deliveries would occur throughout the day outside of peak hours.
4. Delivery and Service vehicle trips for the Staff Secure Facility are assumed to be proportional based on the ratio of residents to the jail residents.

Sources: Napa County 2012 (Table 5); Goble, pers. comm., 2013; Data provided by Whitlock & Weinberger Transportation, Inc. in 2013.
### Table 3.9-6  Estimated Phase II Trip Generation (526 Beds, includes Phase 1 trips)

<table>
<thead>
<tr>
<th>Trip Type</th>
<th>Number of Staff/ Visitors/ Deliveries</th>
<th>Daily Trips</th>
<th></th>
<th>AM Peak</th>
<th></th>
<th>PM Peak</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>AM Peak</td>
<td></td>
<td>PM Peak</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>In</td>
<td>Out</td>
<td>Total</td>
<td>In</td>
<td>Out</td>
</tr>
<tr>
<td><strong>Employee Trips</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Jail Custody Operations Day Shift (6:00 a.m. – 6:00 p.m.)</td>
<td>34</td>
<td>68</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Jail Custody Operations Night Shift (6:00 p.m. – 6:00 a.m.)</td>
<td>23</td>
<td>46</td>
<td></td>
<td></td>
<td>23</td>
<td>23</td>
</tr>
<tr>
<td>Jail Custody Operations Business, Administrative, and Support Shifts (8:00 a.m. – 5:00 p.m.)</td>
<td>49</td>
<td>98</td>
<td>49</td>
<td>49</td>
<td>49</td>
<td>49</td>
</tr>
<tr>
<td>Jail Administrative Day Shift (Sheriff Lt) (6:00 a.m. – 6:00 p.m.)</td>
<td>1</td>
<td>2</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Jail Administrative Night Shift (Sheriff Lt) (6:00 p.m. – 6:00 a.m.)</td>
<td>1</td>
<td>2</td>
<td></td>
<td>1</td>
<td>1</td>
<td></td>
</tr>
<tr>
<td>Staff Secure Facility Administrative (8:00 a.m. – 5:00 p.m.)</td>
<td>6</td>
<td>12</td>
<td>6</td>
<td>6</td>
<td>6</td>
<td>6</td>
</tr>
<tr>
<td>Staff Secure Facility Security Team A/C (Days) (6:00 a.m. – 6:00 p.m.)</td>
<td>9</td>
<td>18</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Staff Secure Facility Security Team B/D (Nights) (6:00 p.m. – 6:00 a.m.)</td>
<td>8</td>
<td>16</td>
<td></td>
<td>8</td>
<td>8</td>
<td></td>
</tr>
<tr>
<td><strong>Employee Trip Total</strong></td>
<td></td>
<td>131</td>
<td>262</td>
<td>55</td>
<td>0</td>
<td>55</td>
</tr>
<tr>
<td>Staff Secure Facility Program Providers</td>
<td>2</td>
<td>4</td>
<td>1</td>
<td>1</td>
<td>2</td>
<td>1</td>
</tr>
<tr>
<td>Staff Secure Facility Inmate Trips</td>
<td>5</td>
<td>10</td>
<td>3</td>
<td>3</td>
<td>6</td>
<td>3</td>
</tr>
<tr>
<td>Jail Visitor Trips</td>
<td>110</td>
<td>220</td>
<td>28</td>
<td>28</td>
<td>556</td>
<td>28</td>
</tr>
<tr>
<td>Staff Secure Facility Visitor Trips</td>
<td>18</td>
<td>36</td>
<td>5</td>
<td>5</td>
<td>10</td>
<td>5</td>
</tr>
<tr>
<td>Jail Delivery and Service Vehicles</td>
<td>9</td>
<td>18</td>
<td>1</td>
<td>1</td>
<td>2</td>
<td>1</td>
</tr>
<tr>
<td>Staff Secure Facility Delivery and Service Vehicles</td>
<td>2</td>
<td>4</td>
<td>1</td>
<td>1</td>
<td>2</td>
<td>1</td>
</tr>
<tr>
<td><strong>Project Totals</strong></td>
<td>277</td>
<td>554</td>
<td></td>
<td>93</td>
<td>38</td>
<td>132</td>
</tr>
</tbody>
</table>

Notes:
1. Staff Secure Facility Inmate Trips are assumed to occur in vans or other multi-passenger vehicles, with three vehicles each making a round-trip during each peak hour.
2. Visitors include business and professional visitors, volunteers/service providers, and inmate family visits. It is assumed one-quarter of all visitor trips occur during each peak hour.
3. Delivery and Service vehicle trips for the Jail are assumed to have one delivery during each peak hour. All other deliveries would occur throughout the day outside of peak hours.
4. Delivery and Service vehicle trips for the Staff Secure Facility are assumed to be proportional based on the ratio of residents to the jail residents.

Sources: Napa County 2012 (Table 6); Goble, pers. comm., 2013; Data provided by Whitlock & Weinberger Transportation, Inc. in 2013

The DEIR traffic analysis was reviewed to determine what difference if any the changes in the trip generation noted above would make to the calculated operation at the study intersections. It was determined that due to the offsetting nature of reversing the trip direction together with the distribution of the limited number of trips to a variety of paths, the changes to the trip generation would not change the analysis, findings, or conclusions as presented in the DEIR.
B1-7 The commenter states that the DEIR is inconsistent in its discussion of transit at the project site. As noted by the commenter, the assumption in the DEIR that 10% of daytime staff and 10% of visitors would make the trip via some mode other than automobile was applied only to the parking demand analysis, and not to the trip generation and vehicle impact analysis. The trip generation and traffic impact analysis presented in the DEIR is based on potential peak hour traffic impacts, and conservatively excluded the potential reductions for carpooling, vanpooling, or alternate modes such as transit, bicycling, or walking, even though such trips are anticipated. Because there was not a reduction for alternative-mode trips in the trip generation, even though they are expected, the estimated number of project-generated trips would accommodate transit vehicles and still overstate the trip generation.

Providing an excessive supply of parking is not desirable due to the environmental impacts associated with adding impervious surfaces. The DEIR parking analysis, which considers parking needs over the course of the entire day, includes the 10% reduction in parking demand for both employees and visitors under the 526-bed scenario only. While transit service does not currently exist in the study area that would accommodate employees starting at 6:00 a.m., the assumptions in the DEIR parking analysis also include other modes such as walking, bicycling, carpooling, and vanpooling, any of which could account for the reduction in parking demand. Further, the DEIR analysis results in adequate parking supply for 100% of the work force, though rarely will 100% of staff be present as there will always be staff members who are out sick, on vacation, traveling, or at meetings. Finally, administrative staff will typically not be working on Saturdays and Sundays, resulting in excess supply to offset the lack of transit service on these days.

B1-8 The commenter states that Mitigation Measure 3.9-4a provides for constructing pedestrian and bicycle access at the existing River-to-Ridge Trail; however, does not discuss improvements to the River-to-Ridge trail at this location to accommodate this additional traffic. As a result of this comment, Mitigation Measure 3.9-4a is revised as follows:

**Mitigation Measure 3.9-4a. Construct Pedestrian and Bicycle Facilities Serving the Site and Connecting to Nearby Facilities**

*The County will construct pedestrian and bicycle facilities connecting building entrances/parking areas to the nearby River-to-Ridge Trail at SR 221. New pedestrian and bicycle facilities constructed as part of this project will be paved, as will the portion of the River-to-Ridge Trail that connects to the project site.*

These changes do not alter the DEIR’s conclusions, nor do they require recirculation of the DEIR.

Further, the commenter notes that the DEIR should discuss the measures the County will take to ensure that pedestrian and bicyclists use this route instead of the Entrance Road. While vehicle trips were assigned primarily to the south, the same distribution was not intended to be applied to bicycle trips. Such trips from the south are unlikely due to the lack of facilities and distance to the nearest residential areas. Rather, the intent of Mitigation Measure 3.9-4a is that a paved trail will be constructed between the project site and existing trail facilities at Streblow Drive as part of the project to encourage bicycle trips from origins in the City of Napa.

Following DEIR release and during preparation of the FEIR, further engineering investigation was completed to determine that the planned pedestrian/bicycle trail (see Mitigation Measure 3.9-4a in the DEIR) can be constructed on the east side of SR 221 within the limits of the project site. Exhibit 3-2 shows a potential layout for the proposed pedestrian/bicycle trail connecting the project site to existing pedestrian/bicycle facilities at Streblow Drive. See Chapter 2, “Minor Modifications to the County Jail Project,” of this FEIR for more details.
Responses to Comments on the DEIR Napa County Jail Project FEIR

Source: Data received from CGL (building design) and RSA (trail design) in 2013; adapted by Ascent Environmental in 2013

Exhibit 3-2

Potential Pedestrian/Bicycle Trail
In response to comment B1-5 as well as this comment, Mitigation Measure 3.9-1b is revised as follows:

**Mitigation Measure 3.9-1b. SR 221/Main Access**

*Prior to occupancy of the site, the County will fund and signalize the intersection of SR 221/Main Access, including providing protected left-turn phasing on southbound SR 221. To eliminate conflicts between the protected southbound left-turn movement and northbound right turns, the free right-turn lane shall be converted to a standard right-turn lane controlled by a yield sign. Similarly, the free westbound right-turn lane shall be converted to a standard turn lane to bring this movement under signal control. Right-turn overlap phasing shall be provided between the southbound left turn and westbound right turn. Adequate right-of-way is available to accommodate this improvement and adequate spacing (i.e., more than 2,000 feet) is available between this signal and the nearest signal.*

These changes do not alter the DEIR’s conclusions, nor do they require recirculation of the DEIR.

**B1-9**  See response to comment B1-4 regarding the County’s decision to proceed with the Pacific Coast parcel (in lieu of the Boca parcel) for project implementation.

**B1-10**  See response to comment B1-7 regarding the proposed amount of on-site parking.
Cakebread Cellars

Brian Bordona, Supervising Planner
Napa County Planning, Building, & Environmental Services
1195 Third Street
Napa, CA 94559

September 30, 2013

Mr. Bordona,

On August 16th, Cakebread Cellars received the Draft Environmental Impact Report for the proposed County Jail Project (State Clearing House #2013012072). As you know, we have a vineyard that spans two parcels to the south of the proposed site and consequently will be impacted by the project. While it is clear that several mitigation measures have been put into place, Cakebread Cellars has concerns about potential impacts on our property and our agricultural operations. The primary areas of concern are: light pollution, noise pollution, water availability, and changes to the flow of traffic.

With regards to the impact of Lighting and Glare Intrusion (EIR Impacts 3.2-4), we are concerned that there are no mitigation measures suggested in the draft environmental impact report. Per the report it states that the proposed projects lighting will “not spill over to adjacent rural properties.” However, it states this without properly explaining why this is the case and how it is to be assured. The report references the code that pertains to exterior commercial light, but does not specifically address how this project intends to minimize light pollution on the surrounding properties. It is our feeling that this needs to be addressed so that there are not significant impacts from light pollution on wildlife and the rural character that currently exists on our property.

Another area of concern for Cakebread Cellars is the Long-term Increase in Noise Levels of On-Site Stationary Noise Sources (EIR Impacts 3.8-2). It is stated in the report that the project will include several noise generating utilities and a public announcement system; however the report does not offer any mitigation measures associated with these potential noise sources. In the draft EIR is does mention that the “resulting noise levels experienced at the Napa State Hospital would comply” with Napa County standards in the General Plan and County Code, but the mitigation measures do not address the rural properties to the south of the project. In order to maintain and protect the local environment, Cakebread Cellars undertook significant mitigation measures when developing our vineyards to the south of the proposed project. It is our hope that our efforts will be reinforced by the mitigation measures imposed upon this project and that the issue of noise pollution will be addressed in more
detail, including the steps that will be taken to avoid noise pollution impacting all surrounding properties.

A third significant concern for Cakebread Cellars is the impact upon the flow of traffic (Impacts 3.9-1 to 3.9-7) and the consequences it has on surrounding properties and businesses. To access our property, our employees must utilize an uncontrolled intersection between the proposed project and Kaiser Road. Our utmost concern is for the safety of those entering and exiting our property and we want to make sure that the mitigation measure suggested will improve the safety around our access point. An additional concern is that stopped or backed up traffic will further restrict access to our property. This could have an impact on the well being of our employees by causing delays in their travel as well as impacting our business operations, most notably the transport of wine grapes from the property to the winery. Accordingly, it is our desire that any additional controlled intersections have measures in place to mitigate any potential threats to the safety of those accessing our property and also reduce the impact traffic will have on our business operations.

Our final area of concern is that of the impact upon the water supply (EIR Impacts 3.10-1). Agriculture is an endeavor that relies heavily on the sustainable use of natural resources, not the least of which is water. While developing our vineyards we have implemented a series of designs and monitoring systems with the intent of making our water use as efficient and conservative as possible. Although we have reached a very high level of efficiency in water use, we continue regard water availability as a vital and scarce resource. We welcome that the draft environmental impact report states that the proposed project will access water through sources other than existing on-site wells, however it is our desire that the existing wells be taken out of service and decommissioned. Because all of the wells in the area are interconnected, we would regard the destruction of these wells to be assurance that the proposed project will not negatively impact our current operations, especially given the measures we have already taken to minimize our own impact upon water availability in the area.

It is important to state that Cakebread Cellars does not oppose the proposed project, but does have some concerns about the required mitigation measures. In the process of developing, planting, and managing our vineyard operations we have always sought to minimize the potential negative impact on our neighbors and surrounding environment. It is our desire that the proposed County Jail Project is planned with the same spirit of stewardship and community that we have embraced.

Sincerely,

Bruce Cakebread
President/COO
Cakebread Cellars

Sincerely,

Toby Halkovich
Director of Vineyard Operations
Cakebread Cellars
B2-1 The commenters express a concern regarding the absence of mitigation measures in the DEIR regarding lighting and glare impacts. See response to comment L2-1.

B2-2 The commenters express a concern regarding long-term increases in noise levels on the rural properties to the south of the project site and the absence of mitigation measures in the DEIR. Impact 3.8-2 in the DEIR describes that the proposed project could introduce several on-site stationary noise sources, such as a public address system; heating, ventilation, and air conditioning (HVAC) equipment; and emergency electrical generators (see pages 3.8-17 and 3.8-18). Noise modeling was conducted for the proposed project based on the location of the nearest noise-sensitive receptor: Napa State Hospital, which is located approximately 1,200 feet north of the acoustical center of the project site. The results of noise modeling indicate that resulting noise levels experienced at the Napa State Hospital (nearest off-site sensitive receptor) would comply with the standards set forth in the Napa County General Plan and the Napa County Code. Therefore, the impact would be less than significant and no mitigation is required.

Cakebread Cellars’ vineyard, located south of the project site, is not considered to be a noise-sensitive land use. The DEIR defines such uses on page 3.8-10 as including residences, parks, schools, historic sites, cemeteries, recreation areas, places of worship, and hospitals and laboratories. However, the vineyard is located approximately the same distance south of the project site as the Napa State Hospital is located north of the project site (1,200 feet). Therefore, it could be expected that resulting noise levels at the vineyard, similar to the hospital, would comply with the standards set forth in the Napa County General Plan and the Napa County Code. Therefore, the impact would be less than significant and no mitigation is required.

B2-3 The commenters express a concern regarding the impact on flow of traffic and the consequences it could have on surrounding properties and businesses. Specifically, the commenters note the uncontrolled intersection between the project site and Kaiser Road utilized by Cakebread Cellars employees. Upon signalization of SR 221/Project Access, northbound queues are expected to extend no more than 250 feet during the a.m. peak hour and less than 150 feet during the p.m. peak hour, with some variance depending on whether there is a crosswalk on the north leg of the intersection or not. The Cakebread Cellars access is located approximately 1,600 feet south of SR 221/Project Access. Because the queues are considerably shorter than the distance to the access, it is expected that there will be no impact to the access due to signalization of SR 221/Project Access except to perhaps slow traffic passing the access point if they are approaching a red signal indication, which would typically be seen as a beneficial impact in terms of safety.

B2-4 The commenters express a concern regarding impacts on water supply and specifically request that the County decommission the existing onsite groundwater wells as an assurance that the proposed project will not adversely affect the commenters’ current vineyard operations. The DEIR states that the proposed project would utilize the City of Napa’s water supply system, and would not use groundwater (including the existing onsite wells). As further explained in the DEIR on page 2-19,

> Depending on the final site configuration selected, the existing groundwater wells would be avoided and/or decommissioned in accordance with applicable state and county requirements.

As described in Chapter 2, “Minor Modifications to the County Jail Project,” of this FEIR, the County is in the process of optioning the Pacific Coast parcel. The County could lease the parcel back to the current
tenant until water service for the proposed project is established. At that time, the County would decommission the existing wells on the Pacific Coast parcel. The existing wells on the Boca parcel would remain in operation, but would not provide water to the proposed project.
<table>
<thead>
<tr>
<th>From:</th>
<th>graham bruce</th>
</tr>
</thead>
<tbody>
<tr>
<td>To:</td>
<td>Jail Project</td>
</tr>
<tr>
<td>Date:</td>
<td>Tuesday, September 24, 2013 4:48:23 PM</td>
</tr>
</tbody>
</table>

Maybe we can give more inmates Asthma that way....
Comment noted. No specific comments addressing the environmental analysis were raised in this comment.
-----Original Message-----
From: Joe Carter [joe.carter3@sbcglobal.net]
Sent: Friday, September 20, 2013 11:18 AM Pacific Standard Time
To: Habkirk, Elizabeth
Subject: Napa County Jail

Liz,

My comment about the new jail site:

1) when you apply for the city water and sewer we would like to access that with the Jail to insure that the highway is not "under construction" multiple times, less impact to the public. We would be willing to pay for the difference in pipe size to insure that it didn’t have a cost impact on the county.

2) The impact to the current water supply that we now have will have to be addressed. Currently we are supplied by a well on our "BOCA" property. I believe that main line runs down through Pacific Coast site. This main line goes to Syar’s lower yard. (west of 221).

Joe Carter
Principle
BOCA
I2-1 The commenter requests that the owner of the Boca parcel be permitted to apply for water and wastewater service from the City at the same time the County submits its application associated with the proposed project so as to minimize construction impacts along SR 221. As described in the DEIR (see Section 2.4.5, “Utilities and Service Systems”), the County will be applying to the City of Napa for approval of an outside water service agreement. Under this agreement, the City would be applying to LAFCO to expand the Sphere of Influence for the City without the intent of expanding the City boundary to accommodate this site. This is allowed under a provision of state law that allows municipalities to extend utility services to another governmental entity outside of its boundaries, for purposes of providing a government function. The Boca parcel will not be eligible for this exemption, but could apply directly to the City of Napa for water service.

I2-2 The commenter requests that water supply impacts related to the Boca parcel be addressed in the EIR. The DEIR evaluates the project’s water supply impacts under Impact 3.10-1, “Water Supply and Infrastructure Impacts,” beginning on page 3.10-21 of the DEIR; this impact was determined to be less than significant. The commenter describes that an existing well, located on the Boca parcel, provides water to the Boca site. Additionally, a main line extends through the Pacific Coast parcel to Syar’s lower yard (west of SR 221). Project construction would avoid this existing infrastructure to the extent practicable. Alternatively, if avoidance is not possible, the County would work with the owner of the Boca parcel to relocate existing infrastructure while minimizing any disruptions in service.

See response to comment B2-4 regarding decommissioning of existing wells on the Pacific Coast parcel.
Meeting Summary

Date: September 18, 2013
Time: 9 a.m.
Location: Board of Supervisors Chambers, 1195 Third Street, Suite 305, Napa, CA
Subject: Public Hearing on the Napa County Jail Project DEIR

Hillary Gitelman, Planning Director, provided a brief overview of the project, including the project objectives, and introduced the project team. The DEIR was prepared in coordination with the EIR for the Syar Napa Quarry Expansion project to ensure that the County’s methodology and approach were consistent between the two documents. Finally, she emphasized that the focus of today’s meetings (one this morning and one at 6 p.m. in the Hall of Justice) are on the DEIR, not the merits of the project.

Gary Jakobs, Ascent (EIR Consultant), described the elements of the proposed project, which include the construction of a new jail with an initial capacity of 366 beds, core support facilities designed for expansion and occupancy of up to 526 beds, and a staff-secure residential facility. The project site is adjacent to the Syar Napa Quarry, with nearby uses also including the Napa State Hospital and Napa Valley College.

Gary reviewed the key dates in the CEQA process, including the dates of the NOP review period, scoping meeting, DEIR review period, and the expected release date of the FEIR. He described the DEIR as a focused EIR, containing analyses of the following environmental resources areas: aesthetics, air quality, greenhouse gas emissions, hazards and hazardous materials, hydrology/water quality, noise, land use/planning, transportation/traffic, and utilities/service systems. Impacts to other resources were evaluated in the Initial Study prepared by the County and circulated with the NOP.

Terry Scott, Chair of the Planning Commission, opened the public hearing for the DEIR.

Matt Pope, Planning Commissioner, stated that he appreciated the County’s efforts in synchronizing DEIR preparation with the preparation of the Syar Quarry EIR to achieve consistency in methodology and approach. He asked if DEIR preparation also considered the recent Napa Pipe EIR.

Steve Lederer, Director of Environmental Management, stated that, as an informational item, the proposed staff-secure facility would not be located temporarily at the Napa State Hospital as stated during the earlier presentation, but rather, it would be permanently located at the project site, as described in the DEIR.

Matt Pope, Planning Commissioner, stated that the River to Ridge Trail is a popular attraction that is located in close proximity to the Napa State Hospital and the project site. He requested that public perception impacts related to this proximity be considered.

Terry expressed a concern regarding public safety due to the project site’s close proximity to the Napa State Hospital and surrounding open space, which is accessible to and used by the public. He stated that there have been a number of incidences (e.g., departures, escapes, etc.) at the Napa State Hospital in recent years that have presented public safety issues. He assumed that there would be procedures put in place to avoid any impacts on public safety, but stressed the importance of considering security in project design.
Mike Basayne, Planning Commissioner, requested confirmation that the proposed project would result in a net increase in water demand, given that the proposed project's demand would be 63 acre feet per year (afy) combined with a reduction in water demand at the existing jail facility.

No other public comments were received.
PH-1 The commenter asked if preparation of the County Jail Project DEIR was synchronized with preparation of the recent Napa Pipe Project EIR to achieve consistency in methodology and approach. Preparation of the DEIR did consider the analysis contained in the Napa Pipe EIR, especially the transportation/traffic analysis. As described on page 3.9-24 of the DEIR, the County relied on the same significance criteria that were applied in the Napa Pipe EIR to evaluate the proposed project’s transportation/traffic impacts.

PH-2 The commenter clarified the location of the proposed staff-secure facility, which was incorrectly described in the presentation as being temporarily at the Napa State Hospital before moving to its permanent location at the project site. The County has temporarily placed this concept on hold while state financing is sought for a permanent staff-secure facility at the project site, as described in the DEIR on page 2-16. This is an informational comment, so no further response is provided.

PH-3 The commenter requested that public perception impacts related to the proximity of the River to Ridge Trail—a popular attraction—to the Napa State Hospital and the project site be considered. Section 3.2, “Aesthetics,” of the DEIR evaluates project impacts on the visual character of the surrounding area, including from two viewpoints along the River to Ridge Trail (Viewpoints 2 and 3). The DEIR states on page 3.2-15:

> ...Views of the site from southbound SR 221 and the entrance to the River to Ridge Trail are limited by trees and vegetation on the northwest portion of the project site and along the project site frontage (Viewpoint 2). The River to Ridge Trail, located along the northern boundary of the project site, is used by hikers, mountain bikers, and equestrians. Views from this trail represented by Viewpoint 3 are limited by heavy vegetation. Construction of the new jail and ancillary facilities on either parcel would not substantially alter the visual character of the site as viewed from these viewpoints. As with views from SR 221, the visual character of the site would not be adversely affected by the project because existing industrial structures would be replaced with structures that are modern and office-like in appearance.

From a land use planning perspective, the DEIR concludes that the project would result in a less-than-significant impact related to conflicts with relevant plans, policies, and zoning adopted for the purpose of avoiding or mitigating an environmental effect because it would be designed to provide for sufficient buffering (through distance, screening, and other mitigation) to avoid incompatibility with adjacent uses. As stated in the DEIR on page 3.7-8:

> The proposed project includes new landscaping that would provide visual screening from surrounding land uses (see Section 3.2, “Aesthetics”). Proposed physical buffers include perimeter fencing around the occupied portion of the site, and additional security fencing around the exercise yards. As noted in Chapter 2, “Project Description,” two conceptual layouts are being considered for the proposed project: one on the Boca parcel, which is more distant from SR 221, but closer to the quarry; and one on the Pacific Coast parcel, which is closer to SR 221, but more distant from the quarry. Both site layout options are nearby to the entrance road for the quarry, which supports heavy truck traffic related to quarry operations. Mitigation measures described in Sections 3.3, “Air Quality,” and 3.8, “Noise,” would be adopted and implemented by the County to address potential air quality and noise/vibration impacts, respectively, of the proposed project.
Further, the County has not received substantial comments regarding the visual perception of the project in relation to the River to Ridge Trail and the commenter offers no evidence to support an alternate impact conclusion. Therefore, no further response can be provided.

PH-4 The commenter expressed a concern regarding public safety due to the project site’s close proximity to the Napa State Hospital and surrounding open space, which is accessible to and used by the public. The project’s proposed security features are described on page 2-15 of the DEIR. The jail buildings and 15-foot-tall exercise yard walls would serve as the primary security barrier, and perimeter fencing around the occupied portion of the site would consist of chain link fencing topped with razor wire. Additional security features are described on page 2-15 of the DEIR.

PH-5 The commenter requested confirmation that the proposed project would result in a no net increase in water demand, given that the proposed project’s demand would be 63 acre-feet per year (afy) combined with a reduction in water demand at the existing jail facility. The projected water demand for the new jail is correct (63 afy at full project buildout); however, the project would not result in a no net increase in water demand because the project demand would only be partially offset by reduced demand at the existing jail. As further described in the DEIR on page 3.10-21:

...While the existing jail facility would remain in place, it would be converted to a holding area for inmates awaiting court dates, and continued use as office space. Future use of the unoccupied space is not known at this time; however, some portion of the existing demand would transfer to the new jail site. Because it’s not possible to calculate the demand that would remain downtown with precision, this analysis assumes that water demands from the new jail facility (366 beds or 526 beds) and secure-staff facility are a net addition to the City’s water system, even though this is acknowledged to be an over estimate and a conservative way to evaluate the project’s water supply impacts.
This page intentionally left blank.