

To: Napa County Conservation, Development and Planning
Department, Attn: Kirsty Shelton, Planner III, 1195 Third Street, Suite
210, Napa, CA.

From: Save Rural Angwin (SRA), Attn: Allen Spence, P. O. Box 222,
Angwin, CA 94508.

Project Title: Pacific Union College/Triad Development Plan
Environmental Impact Report (“Angwin Eco-village”)

Date Submitted: Project EIR Public Scoping Meeting, November 15,
2007

Purpose: Title 14 (CCR); Chapter Three: Guidelines for CEQA;
Article 7. EIR Process; Section 15083 & 15084. SRA is concerned with
possible environmental impacts of this Project and submits the
following in consideration of the extent and content of the Project EIR.

SRA also requests that the following additional “Areas of Probable
Impact” be included in the EIR – Cumulative Impacts, Growth-
Inducing Impacts, Economic Impacts, Alternatives, Community
Character and Mitigation Measures

ENVIRONMENTAL ISSUES/CONCERNS

CUMULATIVE IMPACTS

- 1 Identify, evaluate and consider cumulative impacts of the PUC/Triad Project in conjunction with the Lake Luciana Project, Aetna Springs Project and the Bureau of Reclamation's Visitor Services Plan proposed changes at Lake Berryessa. The geographic extent of the cumulative impacts setting of the PUC/Triad Project should not just be defined by the water use area but also the access routes as well as the areas through which the traffic impacts will have a definite impact.
- 2 Address the cumulative impacts of the approved and contemplated projects in the Middletown area of Lake County (Vintage Faire 137 residential units plus permitted second dwellings, Rim Rock Estates 25 units and the proposed golf course, restaurant, and club house development at the Guenoc Ranch, and Vintage Oaks development including 400 residential units and a 30 acre commercial area).
- 3 At the bottom of page 3 of the Notice of Preparation of this EIR – under “Other Planning Efforts” is a reference to other planning efforts made by PUC, i.e., “PUC Campus Master Plan.”

These comments will assume that the “PUC Campus Master Plan” referenced in the Notice of Preparation is the same as, or very similar to, those future projects noted in the Publication “Institutional Proposal Pacific Union College, Prepared for: Western Associations of Schools and Colleges Accrediting Commission for Senior Colleges & Universities, May 2007, Appendix H, Pg. 59, Pacific Union College Campus Plan-Program Summary”.

http://www.puc.edu/PUC/accreditation/documents/pdf/unprotected/proposal_appendices_2.pdf.

If that assumption is not correct, then all of the following requests to analyze the cumulative impacts of both the “PUC Campus Master Plan” and the PUC/Triad Project should also include the cumulative impacts of the “other planning efforts” to the extent that they are greater or more than those identified in the “PUC Campus Master Plan” referenced in the above document. Project piece-mealing should not be allowed.

- 4 Respond, taking into account the whole action involved, including off-site as well as on-site, cumulative as well as Project level, indirect as well as direct, and construction as well as operational impacts. Include the following listed in the PUC Campus Plan Program Summary (04-19-07):
 - 4.1 30,000 sq. ft. of Light Industrial Area at north end of Airport runway
 - 4.2 20,000 sq. ft. of Airport Service Area for opportunity trade businesses
 - 4.3 20,000 sq. ft. additional airport facilities, such as hangars, per demand
 - 4.4 Increase in student population from current 1,540 to an estimated 2,300
 - 4.5 Enlarged parking area in flight path

- 4.6 Replaced or enlarged and upgraded sewage treatment plant to include Maintenance Compound
- 4.7 100,000 sq. ft *Innovation Quad for Partner Institutes and Incubators*
- 5 Napa County Draft General Plan (pg 55) proposes “Policy Ag/LU-54: *Notwithstanding policies elsewhere in this General Plan, re-designating the existing, already developed, residential area of Angwin from agriculture (AWOS) to rural residential (RR) is worthy of consideration by Napa County voters pursuant to Measure J.*” The incremental impacts of a successful Measure J vote that would allow further build-out (second units) to the existing village should be addressed in relation to this Project EIR.
- 6 In addition to the Project and preceding #4 and #5 impacts, identify the developable parcels and potential number of housing units that currently exist in the Howell Mountain/Angwin area that could be added to the population base of the area. What is the total growth potential for the area?
- 7 Given the cumulative potential population increase, Angwin could become the third largest “city” in Napa County.
- 7.1 Address the economic impact of the Project and PUC Campus Plan on future tax revenues.
- 7.2 Are future tax revenues from this Project and its associated components adequate to cover the County’s “cost of community services” and preclude current tax-paying County residents from having to subsidize impacts of the development?
8. We request that the Project EIR, in its analysis of the cumulative impacts of the Project and the proposed PUC Campus Plan expansions, include a complete Urban Water Management Plan, as that term is used for the purposes of complying with the Water Supply Assessment provisions of California SB 610 and/or the Written Verifications of Water Supply requirements of California SB 221, whether or not the actual thresholds of those two statutory requirements are met. This Project – and the potential ramifications of its cumulative impacts when combined with the proposed Campus Plan expansions – warrants this level of scrutiny.
- 9 Address the cumulative impacts of the Project and Campus Plan contemplated on existing roadway infrastructure including but not limited to: Traffic increases, delivery of materials, transport of construction equipment, additional infrastructure needs such as turn lanes on Howell Mountain Road or widening of road or creation of a regulated intersection(s). Will the Project and Campus Plan components cumulatively alter the roadway LOS or cause an increase in traffic load and safety? What will be the anticipated LOS of Deer Park Road and Howell Mountain Road at build out? Evaluate safety in addition to LOS of Deer Park/Howell Mountain Road and their two possible bypasses, Sanitarium Road and White Cottage Road. Evaluate potential increased hazards at existing hairpin curves on Deer Park/Howell Mountain Road, end to end.

- 10 Address the cumulative growth-inducing impact of new utility installations and/or upgrades as they relate to the PUC Campus Plan. *See map page 26 of Project Proposal.*
- 11 Address the cumulative impacts of construction of 12 estate homes, 12 permitted second dwelling units, and 12 guest units, accessory agricultural structures and construction of a new private roadway east of campus (Las Posadas Road to Howell Mountain Road).
- 12 Address the cumulative impacts of additional parcels not owned by PUC (APN #024-163-010, #024-153-029, #024-161-001) but contiguous to the proposed Project and the availability of newly installed infrastructure/utilities along with the property owners' stated desire to develop these parcels for more intense urban uses. *(Re: Letter to Peter McCrea, Chair General Plan Steering Committee, from Jeff Veness and Bryan Breckenridge January 9, 2006).*
- 13 Address the cumulative impacts of development of APN #024-080-029, which has been approved for 77 units of housing as part of the *DeHaro Stipulation*, and appears to be included in the Project proposal for Phase II/III (*pg22-24).
- 14 Address the totality of the anticipated Projects on the existing quality of rural living.
- 15 How will a projected increase of 800-1,000 students living on campus (present 1,500 or less to projected 2,300 students) nine months of the year impact usage of water, electricity, sewage, and roadways? Consistent with an increase in student population, the PUC Campus Plan (non-Project planning) identifies a projected increase of 60 faculty and staff. What percent would live on campus and what percent would need to find housing in the community? How many new service provider jobs will be created as a result of the Campus Plan increase in student, faculty and staff population?
- 16 At completion of the proposed Project, PUC Campus Plan, and potential existing developable parcels, what governmental, Special District, and/or community organizations will be necessary to manage and govern Angwin? How will these be created? How will they be funded? What resulting local assessments and new taxation will occur?

GROWTH-INDUCING IMPACTS

Evaluate the resulting economic pressure to development on adjacent agricultural watershed lands.

POPULATION at PROJECT BUILD-OUT

Will the Project, coupled with the PUC Campus Plan, have growth-inducing impacts directly or indirectly on rural unincorporated Angwin, the cities of St. Helena, Calistoga, Yountville and Napa County as a whole? The Project application identifies the following:

**Area 1 -The Village Square Neighborhood:* proposed to be 220 new housing units consisting of
20 flats above retail shops
80 single-family homes
80 cottage/cluster homes
40 town houses
55,000 *sf* of local-serving retail to include a grocery store, hardware store, bookstore, café, and other local businesses, a sheriff's substation, expanded teen/community center and a transportation resource center
17,000 *sf* - 20-unit Inn

**Area 2 – Highland Oaks Neighborhood:* proposed to be 101 new single-family homes

**Area 3 – New and Relocated Housing within PUC Campus:* 59 new affordable housing units (type unknown); 110 existing upgraded to include single-family homes, cottages, duplexes and town-houses (unknown mix of numbers)

**Area 4 – Mill Valley (PUC Campus Plan):* proposed potential 24 homes, plus 12 guest units

The Project (380 units + 110 replacement units) + PUC Mill Valley (24 units)

Project the total number of additional people to be added to Angwin population by this proposed Project build-out.

EMPLOYMENT – During Construction Phases and at Project Completion

- 1 From what sources and locations will construction workers be hired?
- 2 Where will the construction workers purchase food? Where will they purchase food, if they are not vegetarians?
- 3 Where will the construction workers live during the construction phase?

- 4 What will be the hours per day, days per week and months of construction activity and what will be the inherent noise, air quality, and visual impacts on surrounding existing homes, the Angwin community, and college educational endeavors? Will the local community observance of the Sabbath (no work from sunset on Friday until sunset on Saturday) be observed by contractors, construction workers and transporters of materials and equipment?
- 5 Will Angwin lose any existing services during construction of the Project?
- 6 What is the anticipated occupancy rate, by season, for the 20-unit Inn?
- 7 What is the anticipated occupancy rate, by season, for the B&B?
- 8 What will be the impact of construction worker and employee parking on the Project sites? What will be the impact on sanitation and garbage systems?
- 9 Address the impacts of additional vehicle trips up Deer Park/Howell Mountain Road for construction workers. Address the impacts on surrounding communities (Pope Valley, St. Helena, Calistoga and Napa) of additional construction workers using city streets or County roads to access Project sites.
- 10 How many new jobs will be created at completion of this Project that do not exist now? List the specific jobs and expected salary ranges for the following: New businesses including the 20-unit Inn and B&B (part of the PUC Campus Plan, non Project planning) and any associated services, the “expanded teen/community center (*pg7), the transportation resources center (*pg7), the horse stables (*pg7) as well as potential service, staff and contract jobs associated with the new homes including *Mill Valley*. How many additional vehicle trips, including delivery services, are anticipated daily? How many new jobs will be created under the PUC Campus Plan (*pg6-9) and will, therefore, require yet more housing? ***“Economics and Employment: The Eco-village should seek to create local employment opportunities through ecologically-friendly businesses; help to better balance local jobs with housing; and provide local goods and services.”*** (*pg6) Define “ecologically-friendly businesses.”
- 11 The creation of service jobs that will arise from the construction of the 20-unit Inn, B&B and retail/commercial components of the Project is likely to result in a need for more affordable housing in the Angwin Area. How will the need be met?
- 12 Address the impact of the planned construction of an *Innovation Quad and Partner Institutes for Incubators*, additional airport service area and Industrial Park, coupled with the Project on the jobs/housing balance in the Angwin area? Will these urban uses and jobs created result in an ever-increasing demand for more housing?

HOUSING and LAND USE

- 1 *“The County will assume that the density of development in the Angwin Area precludes future subdivision activity based on septic tanks and wells. The Angwin Urban Area is PUC and adjacent commercial facilities.”* (Current GP) Under the Current General Plan the above policy would preclude further subdivisions based

upon wells. Water service per Project is to be provided by PUC existing water system. PUC's water source is from wells. Project EIR must address the inconsistency of relying upon wells.

- 2 Project proposal (*pg7) notes that 59 units of *Affordable Housing* (hereinafter "AH") will be constructed on the PUC campus. Are these 59 units intended to comprise any of the units agreed to as part of the Stipulation and Order between the *Latinos Unidos de Napa Valley (Deharo)* and County of Napa, June 21, 2004, and if so, do they satisfy the Stipulation? *Note: 80-87 were identified in the Napa County General Plan Housing Element (2004)*. Will on campus affordable housing be available to all Napa County residents who meet affordability guidelines?
- 3 The proposed phasing of the Project depicts 3 phases. What are the anticipated time frames for each phase? What percent of the total Project AH will be constructed in Phase 1? Can building permits mandate that a reasonable percentage of the *Affordable Housing* be built during the first phase?
- 4 Where, if at all, does the current Napa County General Plan Housing Element approved 191 housing units (Site A APN: 024-410-007 and Site B APN: 024-080-029) overlap with the Project application for 380 housing units?
- 5 What is the plan for APN: 024-080-029 Cold Springs Road (7 acres proposed for development of 77 units as part of the approved 191 housing units) that is not being shown as an area for building development in the plan for this Project? Would these 77 units be built in addition to the proposed 380 units in the Project?
- 6 Will zoning allow each single-family residence to have a future additional secondary housing unit ("granny unit")? If so, how many units could be added to the total?
- 7 PUC (Non Project Planning) intends to "construct a new private roadway...from Las Posadas Road to Howell Mountain Road". How will this construction and roadway impact Las Posadas forest? Will widening or realignment or tree removal occur along Las Posadas Road? Will wildlife movement be impacted? Will traffic flow on Las Posadas Road and Cold Springs Road be noticeably increased? Who will maintain this new road, once it is built? Who will pay for said maintenance?
- 8 What is the square footage and lot size for each of the PUC Campus 110 replacement homes compared to the existing units?
- 9 How many acres of vineyards will be allowed under the proposed Conservation Easements for the *Mill Valley* parcels?
- 10 An analysis of current housing vacancies for owner-occupied and rental properties must be conducted prior to Project EIR completion.
- 11 Discuss "*Local Preference*" housing. Who would qualify? Who sets the criteria? Who implements and manages the program long range? Define the authority/agency under which this will be implemented and managed.
- 12 What laws apply to replacing an existing mobile home park? Identify the agency for overseeing the "*Mobile Manor*" demolition plan and when they will be brought into the process.

- 13 What parts of “*Village Square*” (Area 1) will be held in common and what parts owned privately? Who will own the land and buildings in the retail center and Inn? How will decisions be made regarding what businesses occupy the retail center? Will a winery tasting room be permitted? Will sale of alcohol, tobacco, meat, lottery tickets and ammunition be permitted? How will conflicts be resolved and decisions enforced? How will the “*Village Square*” be “governed”?
- 14 How will the project housing increase affect ABAG’s *Projections 2009* – the bi-annual assessment of projected housing and job growth in each ABAG jurisdiction?

WATER SUPPLY

- 1 How much water will be needed for this Project? In the *Village Square Neighborhood*? *Village Square* retail area? *Mill Valley* (residential and agricultural)? The *Highland Oaks Neighborhood*? New and relocated PUC Campus housing? Twenty-unit Inn? New public green? Howell Mountain Road linear park? Highlands Park? Highlands community garden? New horse stables? Bed & Breakfast?
- 2 From where will the water for the Project come? What is the source for Project water before and after PUC sells the land? What do the current water system permits allow? Who will have responsibility for on-going water system monitoring and maintenance? What will the legal arrangements be for water rights for all the new users in the Project area?
- 3 A complete Hydrology baseline inventory and analysis of the Lake Hennessy sub-watershed of the Napa River drainage basin (20 year assessment of past water usage and 20 year projection of anticipated water usage) is necessary, as well as an analysis of the impact of all components of the Project on the watershed. Identify the boundaries of the watershed, aquifer recharge area and groundwater basin, including depths. How will the production rate of existing wells on Howell Mountain be impacted by the Project? What will be the impact on down stream water users such as the Lake Hennessey Reservoir and the City of Napa?
- 4 Are any water “offsets” being proposed by Project Developers?
- 5 How will water supplies be maintained in the event of multi-year and/or severe drought?
- 6 PUC is currently engaged in the sale of large quantities of water to off-site locations. The figure that is used to identify “Current Consumption” should not include the amount of water currently being sold. If it does, that amount of water should be distinguished in the analysis of “Current Consumption”.
- 7 Vineyard irrigation and frost protection rely on groundwater from wells; address the impact on them due to added groundwater use by urban intensification.
- 8 Will Howell Mountain Mutual Water Co, Inc infrastructure be impacted? Address the cost to repair HMMWC supply lines if impacted during Project and responsibility for expense of repairing. How will HMMWC water supply and the Freisen Lakes be impacted?

- 9 Will there be subsequent reduced flows to Conn Creek, Moore Creek, and/or Putah Creek?
- 10 How will the proposed “harvesting” of rainwater impact the supply and recharge of surface and groundwater and creeks and streams?

WASTEWATER DISPOSAL

- 1 How much sewage and waste water is treated each day currently at the PUC treatment facility and what will be the estimated amount generated and treated per day with the building of this proposed Project? Will construction expansion or upgrading of the current treatment facility cause any significant impact to Conn Creek or have a visual impact on the surrounding area? Identify the environmental impacts associated with construction and operation of the new/upgraded wastewater treatment facility. Will an upgraded facility become an attraction and justification for more growth?
- 2 Analyze storm-water calculations during construction and when the proposed Project is finished.
- 3 Use population build-out density in the calculations of maximum usage for the wastewater treatment facility.
- 4 Will all new buildings be double-piped (for most effectively using reclaimed water)?
- 5 Where will the treated sewage go? Will non-potable water be used for irrigation and/or on lawns or recreational space? What are the health and safety issues? What impact will wastewater have on fish and wildlife?
- 6 Has PUC demonstrated permit compliance with waste discharge requirements and prohibitions required by California Regional Water Quality Control Board, including collection, treatment, distribution, reuse or disposal of waste, transport, storage facilities and areas, identification of accidental loss, untreated waste bypass and contaminated drainage, as well as monthly, weekly and emergency written reporting? Has PUC violated any waste discharge requirements that have contaminated soils proposed to be built upon?
- 7 What is the risk of airborne particulate matter for spray fields and sludge areas and what measures are required to prevent risk of exposure? What are the implications of building on soils used for wastewater spray and sludge disposal? Are there disclosure requirements to the buyers?
- 8 What specific measures will be in place with regard to impervious surfaces? Detail the specific impervious surfaces. How will the Project impact existing drainage and/or the amount of surface runoff? Will new storm water drainage systems be necessary and, if so, what will be the environmental impacts?
- 9 How will the increase in transient population to Howell Mountain (visitors to the 20-unit Inn and the B&B) affect the capacity of the sewage system? Specify the estimated increase in such population by season.

- 10 Who will own and be responsible for the on going monitoring and maintenance of the upgraded wastewater treatment facility? Is the facility permitted for college-owned and non college-owned facilities and subdivisions?
- 11 Who pays for problems caused by miscalculations of sewage capacity after the developer has finished the project? Will there be an insurance policy or a bond placed on the developer to provide cleanup? What will be the amount of the policy or bond? Who will be in charge of its dispersal?
- 12 Will this project necessitate a Special Services District for the wastewater? What will the governance be for such a District? Will it need a permit to run at a higher capacity? Will existing Angwin residents be assessed connection fees and ongoing user fees?
- 13 What are the required upgrades to the wastewater treatment facility and potential expansions including increased capacity and changes in customer base?
- 14 Will the capacity of the upgraded wastewater treatment facility be adequately sized to handle additional capacity of on-campus Projects, the airport, and the industrial park(s) such as an “*Innovation Quad*” (*pg9)?
- 15 (*pg10) “The Eco-village will use existing PUC...(sewage) treatment facilities.” Does their current sewage plant permit allow support of a residential development not owned by PUC?
- 16 (*pg10) “PUC has a permit...for sludge disposal...” For how much? Does the permit include disposal resulting from homes not owned by PUC? Where will sludge disposal sites be located?

LAW ENFORCEMENT

- 1 How will the Project development, “including non-project planning” (*pg9) affect the need for more law enforcement? Calistoga, with a population of 5,250, has a police force of 11 full time officers. Angwin, with a permanent population of 3,000, a student population of 1540 and proposed Eco-village population of 972, would total 5,512. Currently how many Sheriff deputies are stationed throughout unincorporated Napa County during the weekend, holidays and weekdays? How many additional officers will be required by the population increase associated with this Project development? Who will pay for the additional law enforcement?
- 2 What is the current crime rate for Angwin? What will be the anticipated rise in crime as a result of this Project?
- 3 Where will offenders/prisoners be transported? Will the Sheriff substation have a holding cell?
- 4 What in-lieu fees will be paid by the developer for law enforcement services?
- 5 Who will pay for the initial and ongoing costs of the “Sheriff sub-station” building (purchase or lease), maintenance, utilities, furniture and equipment and supplies? Who will staff the sub-station? What percent of the time will a Napa County deputy

(Peace Officer) be on duty at this location? Will any other public safety personnel work at this location?

- 6 Will the EIR compare the before-and after-development crime rates at other places where similar development has occurred and the effects on their communities?
- 7 If there is a bar or tavern in the new *Village Square* or Inn with housing nearby, what will be the need for more law enforcement time to be spent in Angwin due to complaints coming from the flat owners living above the commercial areas?

FIRE, PARAMEDIC, and DISASTER SERVICES

- 1 Given a single road access up Howell Mountain, justify a 22% (to possible 45% or more) population increase as proposed by this Project.
- 2 Who is and will be the Responsible Agency for wild land fire protection and emergency services in Angwin? In Napa County, Angwin has the highest percentage (70.5%) High and Very High fire danger. Must this be disclosed to buyers?
- 3 How will the increase in population to the Angwin area as a result of this Project impact EMS and Fire facilities, equipment, materials, and personnel? Will there be a need for paid fire, rescue, and paramedic personnel? Who will pay for such upgrades? (*See bullet #1, Law Enforcement*) Will there be a subsequent impact on Pope Valley Fire Department? Deer Park Fire Department? St. Helena Fire Department?
- 4 Based on current insurance and fire ratings, will new housing owners be able to obtain fire insurance?
- 5 Will the new homeowners, through fees, contribute to the increase in firefighting needs? Will additional taxes and assessments be levied on existing homeowners?
- 6 What is the maximum height of the proposed new buildings in the Project? Is the current fire equipment adequate to handle fires in such buildings?
- 7 How will the Eco-village affect the County's Disaster Mitigation Plan and who will pay for the cost of upgrading or changing it to include this Project?
- 8 What fire-safe planning has been incorporated into this Project? Who will pay for updating the Angwin Community Evacuation Plan?
- 9 Will there be any gated or restricted access to any portions of this Project? A single narrow road is proposed to access the "*Highland Oaks Neighborhood*" (101 single family homes; *pg20); how will firefighting and evacuation concerns be addressed? Will a new second roadway access be required?
- 10 What "*call out and response*" data is available for the Pope Valley/Angwin/Deer Park area? What are the total number of volunteer firefighters and rescue personnel? What is the average number of volunteers who respond to a given call or call category? What is the average number of callouts per week? What is the average number of

calls per volunteer per week? What is the anticipated increase in calls/week and calls/volunteer/week with the implementation of this Project?

11 Who will own the land, building and equipment of the Angwin Fire Department?

SCHOOLS

- 1 Assess the adequacy of the elementary and high school public facilities relative to projected population growth in Angwin. Specifically estimate the number of elementary, middle, and high school-age students that will result from the proposed Project. Address the impact of any student population increase on the Howell Mountain School District (HMSD) K-8 and the St. Helena Unified School District (SHUSD). The SHUSD is a Basic Aid district (Education Code 48031). If enrollment grows due to additional students from subdivision development in Angwin, what impact will this have on cost/student, number of students/teacher and need for additional facilities, supplies and/or teachers?
- 2 What developer fees will be required by the County as a result of the increased number of bedrooms this Project will add to the Angwin community? What is the schedule for fee payment and penalties for non-compliance?
- 3 What will be the mode of transportation to St. Helena High School and/or other local public high schools for the new high school age students added to the Angwin community as a result of this proposed Project?
- 4 The Project proposes a pedestrian path between Howell Mountain Elementary School and the *Village Square/Village Square Neighborhood*. Where will the path be constructed? How will it be funded? How will right-of-ways be secured or property purchased? Who have will have responsibility for ongoing maintenance of the path?

WASTE MANAGEMENT

- 1 How will the collection, monitoring, and disposal of trash, recycling and green waste be handled for the common areas, public greens and parks?
- 2 Will the Project result in the requirement that all Angwin residents participate in curbside garbage, recycling and green waste pickup?
- 3 How will the impact of demolition of 110 existing Campus units and demolition of the current "*Angwin Plaza*" be monitored, including removal and proper disposition of debris and hazardous materials? How will all excavated materials, including the underground garage area, be disposed?
- 4 Address the impact on capacity of the local Land Fill to accommodate additional trash and construction debris from Project(s).
- 5 Address the impact of early morning noise associated with all of the increased waste management pick-up.

CLIMATE and GLOBAL WARMING

- 1 What is the expected kilowatt production that will be generated by this Project? What is the expected total power consumption of the Project?
- 2 Will the co-generation plant on the PUC Campus provide electricity for the Project? How much?
- 3 Is there enough PG&E service? Can/will PG&E expand services? What modification to existing power poles and supply lines will be necessary? How will this be funded?
- 4 Discuss the increase in temperature brought on by reflective roof surfaces and increases in paved and impermeable surfaces that will result in local temperature increases in localized areas. How are these heat islands anticipated to impact existing forests?
- 5 How will the Project and subsequent PUC Campus Plan development contribute to Greenhouse Gas (GHG) emissions and atmospheric GHG concentrations? Address and quantify the GHG impact of this development and the GHG impact as a result of VMT due to remoteness.
- 6 Please quantify Greenhouse Gas (GHG) emissions from Project, using best available information and modeling tools such as URBEMIS, Sustainable Communities Model, EMFAC, and/or CARROT (Climate Action Registry Reporting On-Line Tool).
- 7 Address the future infrastructure needs of the Innovation Quad, Airport Service area, and Industrial Park. Will utilities installed as part of this proposed Project be sized to adequately address the additional needs of these future projects including storm water run off, waste water, electricity, natural gas, telecommunications services and water?
- 8 Will utilities and infrastructure be sized to handle future anticipated urban intensification on privately owned parcels contiguous to Project?

TRANSPORTATION and TRAFFIC

Circulation

- 1 Assess the adequacy of the existing Deer Park/Howell Mountain roadway system from Silverado Trail to Pope Valley (both directions). Is there a need for potential expansion and improvements as a result of traffic generated by the Project's planned land use changes? Will Howell Mountain Road need to be widened? Re-sloped? Analyze road condition, capacity, existing traffic volume (using peak-rate flows), LOS currently and at completion of all Project phases including PUC Campus Plan, ability of roadway to accommodate local bus transit services, school buses, construction and agricultural vehicles and equipment, projected traffic volume and capacity to handle at no less than LOS "C" and adequacy of emergency vehicle access and evacuation routes. Analyze the traffic impact to the entire Deer Park/Howell Mountain Road roadway system, classified as a "collector" roadway. Include assessment of how private driveways interface with this "collector" roadway. If improvements are necessary, how will they be funded?

- 2 Will this Project EIR establish new “baseline” traffic counts and surveys or rely on information or findings of prior studies?
- 3 Analyze historical data and trends with regard to vehicular traffic accidents on the Deer Park/Howell Mountain Road (end to end) for the past five-year period. How will Project-generated traffic affect safety risks?
- 4 Evaluate traffic congestion at key intersections with Howell Mountain Road, including White Cottage Road (north and south), College Ave, Cold Springs Road and Brookside Drive (west and east). What specific intersections will require signal controls subsequent to Project? How will they be funded?
- 5 Evaluate potential conflicts of increased vehicle traffic, construction equipment, and vehicles associated with agricultural business on the “collector” road.
- 6 Will any roads other than Deer Park/Howell Mountain Road need to be widened? If so, how will the work be funded?
- 7 What will the effect on traffic be due to expanded commercial development in Angwin?
- 8 What will the impact on wildlife be due to the increase in traffic and reduction of open space?
- 9 Will hazardous materials be used, stored and/or transported to/from Project sites?
- 10 What “innovative transportation alternatives and incentives to reduce car trips” (*pg6) will be provided? What is the projected use? Who will pay the ongoing maintenance and operational costs? Will they serve Pope Valley? How will funding be assured or endowed so there is no possibility that it creates new costs assessed to present residents on Howell Mountain?
- 11 Deer Park/Howell Mountain Road has long been used for bicyclist training and events. Address the safety of pedestrians and bicyclists using the road system during Project construction years and at build out of the proposed Project and PUC Campus Plan.
- 12 What will be the traffic impact on White Cottage Road if the portion of Howell Mountain Road adjacent to the college and commercial zone becomes a narrowed “*tree lined boulevard*” with “*traffic calming measures*” incorporated? How will an increase in road maintenance be financed?
- 13 Identify a preferred truck route for this Project. What regulations would be needed? What special permits are required for large transport vehicles?
- 14 How will the public be notified of construction delays?
- 15 Will people moving into the Project “*Neighborhoods*” (something that looks “urban”) have a higher expectation for Howell Mountain Road maintenance, repair, black ice and snow removal, road markings and signage? What will be the impact on Napa County’s budget?
- 16 Given 874 existing housing units (2000 Census) and the addition of the Project’s proposed 380 housing units, what traffic impact will a 44% increase of housing units

in Angwin have on Deer Park, St. Helena and Pope Valley? On Upper Napa Valley and on Napa County as a whole? Discuss vehicle trips, volume to capacity ratio on roads and congestion at intersections.

- 17 “Transit Measures” (*pg8) – How will it be funded, operated and controlled? What specific percentage of trips by new residents is expected to be accommodated by this transit service and what is the basis for that estimate?
- 18 What Class bike/hike paths are proposed and evaluate potential for regional connections?
- 19 Comment on the impact of “*road improvement*” to mitigate traffic that will negatively impact the unique, narrow and winding, wooded roads that serve the community. How will the rural nature of Howell Mountain roads be preserved?

Airport

- 1 “*This application does not propose any expansion or lengthening of the airfield*” (*pg9). What percent use increase of the airport will occur as a result of implementation of the proposed Project? What will be the impact of the increase on existing residents?
- 2 Evaluate air safety and airport land use requirements. The Napa County Airport Land Use Commission must review this proposed Project. Inventory potential safety hazards posed by airport activities to surrounding land uses, pre- and post-Project.
- 3 Does the Angwin airport have a current Master Plan and/or an Airport Compatibility Plan? If not, will such plans be created or updated?
- 4 Will airport operation restrictions be required as a result of Project housing components? What protections will the airport have against new home-owner complaints as the homes are sold and re-sold?
- 5 Will the Angwin airport be used to facilitate construction of the Project? If, so, what impact will there be on airport operations? Will people residing or working near the airport be exposed to any safety hazards? Will construction use of airport interfere with any emergency response or the Angwin Emergency Evacuation Plan?
- 6 Will *Mill Valley* Project estate parcels have direct airplane taxi access to the airport either at the time of sale of the estate lots or by future owner permit process? Will development of estate parcels impact airport landing patterns?
- 7 Who is anticipated to own the airport at the conclusion of the Project?
- 8 Assess the location, type, volume and height of development anticipated at the airport and in the areas surrounding the airport.
- 9 Identify potential safety hazards to aircraft passengers posed by existing and proposed land uses near the airport.
- 10 Assess the adequacy of ground access to the airport. Will improvements be necessary? Who will pay for these improvements? Would the existing speed bumps be allowed to remain on the access road if the airport were no longer owned by PUC?

- 11 Will there be airport improvements in support of wild land fire protection and response?
- 12 Address the accuracy of the Project (*pg7) statement, “The *Highland Oaks Neighborhood* will be nestled between Parrett Field and the forest along Howell Mountain Road... Buildings will be set back at least 500 feet from airstrip ...and will not be visible from Howell Mountain Road.” Conduct an on-ground verification and publish the findings. What requirement will there be to maintain this visual protection? Who will pay for it? How will it be enforced? Will airport landing patterns be affected by the location of this development?
- 13 Where will airplane fuels be stored?
- 14 The present FBO (Fixed Based Operator), Mike’s Aero, we understand to be on short-term lease. What future development of the FBO operation will occur to support increased air traffic? What airport expansion is planned for runway length and taxiways?
- 15 Will there be nighttime airport use? (With subsequent light and noise impacts)

Parking

- 1 How much parking will be created “*via a small surface parking lot at the market*” (*pg7)?
- 2 What impacts will result from a subterranean parking facility? How many underground parking spaces are estimated to be needed for the following proposed and future Campus projects: 100,000 Sq. Ft. Innovation Quad, student/staff parking, the Eco-village, the Inn and any other potential uses?
- 3 Will parking for commercial purposes be “*along the pedestrian-scale streets*”?
- 4 What parking fees or permitting systems will be imposed on existing residents and users of the “*Village Square*”? Who are “*principal users*” (*pg8)?
- 5 What is “unbundling” of parking costs from housing costs (*pg8)?
- 6 Who will pay for a “*transportation concierge – Mobility Coordinator*” (*pg8)?
- 7 Specifically define “*Parking Management Best Practices*” (*pg.7).
- 8 Define “*Park Once Policy*” (*pg8). How will it be enforced?

BIOLOGICAL RESOURCES

VEGETATION

- 1 “*The Project site has a variety of tree cover including forest and riparian woodlands.*” How much cutting and denuding of the vegetation will the project conduct? Will there be limitations set on the amount of vegetation removal? Identify specific locations, species, age, DBH, and number of all trees to be removed for all areas of the Project. How will there be compliance with County Code section 18.108.027?
- 2 Will PUC be able to use its non-industrial timber harvest permit on lands that it proposes to sell? Are any proposed tree removal activities covered by the terms of PUC’s non-industrial timber harvest permit?
- 3 Will native vegetation and fire-smart vegetation be used for landscaping in the *Village Neighborhood*?
- 4 Identify any special status plant species at the Project sites. Provide documentation that monitoring and mitigation measures are taken throughout the proposed Project implementation.
- 5 Address the presence of oak woodlands in Project area and describe their exact location, species, distribution, and DBH. How will the proposed Project address protections of these important plant communities?
- 6 Who will be responsible for funding arborist work when needed for the Howell Mountain Road “tree lined boulevard” (aka *the tunnel of trees*)?
- 7 Address the lack of biotic resource and distribution data available in the *Mill Valley* wetlands area. What are the physical boundaries of the wetland and vernal pool areas of the *Mill Valley* proposed parcels? What evaluations and assessments are to be conducted in winter months in order to evaluate the wetlands when the maximum number of species is observable? What development plans of the Project for the *Mill Valley* area will remove, fill or hydrologically interrupt the wetlands?
- 8 Comment on the *Forest Preserve* area and why it is not noted to have permanent protected status. What protection mechanism is proposed for this area?
- 9 Map riparian vegetation.
- 10 Assess the potential impacts of the project on the continuity of plant and wildlife habitats, including the potential to fragment plant and wildlife habitat.
- 11 Except as otherwise more specifically requested above, provide a complete assessment (including but not limited to type, quantity and locations) of the habitats, flora, and fauna within and adjacent to the project area, including endangered, threatened, and locally unique species and sensitive habitats. The assessment should include the reasonably foreseeable direct and indirect changes (temporary and permanent) that may occur with implementation of the project.

STREAM CORRIDOR

- 1 Could increased discharge of “recycled” effluence have a negative impact on wells, and/or native species in and around Conn Creek, Moore Creek and Putah Creek? What will be the downstream impacts on Lake Hennessey (Napa’s water supply) from increased nitrogen supply?
- 2 Will the new project cause more silting of Conn Creek and ultimately Lake Hennessey?
- 3 Evaluate potential degradation or destabilization of downstream channel morphology.
- 4 Evaluate potential degradation of surface water quality from site activities, such as increased turbidity from sedimentation, particularly during construction.
- 5 Evaluate change in storm water runoff volumes and characteristics as a result of Project implementation.
- 6 Evaluate potential over-taxing of existing storm drain and flood control infrastructure as a result of increased runoff upon implementation.
- 7 What existing data sources will be relied upon to evaluate plant and animal species present in Conn Creek Corridor? If it is determined that current available data is inadequate to evaluate impacts, who will implement the necessary, additional biological and botanical studies?
- 8 Delineate the boundaries and descriptions of unique water resources in all project sites (e.g. wetlands, riparian corridors, vernal pools, lakes and streams).
- 9 Address impacts that will occur to Conn Creek by changes to Angwin Avenue and Brookside Drive as a result of the Project. What mitigation measures are proposed to protect wetland, stream habitat, plant and wildlife in this area?
- 10 Address the relocation of tennis courts and ball fields to west side of Conn Creek. How will these impact wildlife migration corridors? How will this impact ground water recharge areas? Will vehicle access be permitted to these facilities? Where will parking occur for use of these facilities?
- 11 How will the massive earth-moving required by this Project affect the natural drainage of the Angwin basin?

WILDLIFE

- 1 What Baseline Data studies will be completed to address the current gaps in knowledge about wildlife in the Angwin area?
- 2 Will there be an impact on any species identified as a candidate, sensitive or special status species or to the habitat of any of these identified?
- 3 Identify key wildlife habitats in or adjacent to Project sites, including winter range and migration routes, wintering and nesting grounds for waterfowl and other birds.

- 4 What will be cumulative impacts of this Project and other development projects in Pope Valley on wildlife populations, wildlife habitat and on wildlife movement?
- 5 How long will monitoring processes be required?
- 6 Will the *Mill Valley* parcels impact wildlife movement by subsequent fencing of parcels?

AGRICULTURAL RESOURCES

- 1 What are the anticipated effects on tourism and the local wine industry during the construction phases of the Project?
- 2 How is the “agricultural conservancy operating on both PUC-owned parcels and on individually-owned parcels” to be structured and governed?
- 3 What will be the “assessment payable by Eco-village residents” for the operation of the proposed Angwin Agricultural Conservancy (A.A.C.)? What “assessments” will existing households in the Angwin area pay?
- 4 Address the loss of a current locally important family farming operation (Garbanzo bean farm) located on APN # 024-410-007 notwithstanding the Project statement that there will be *no net loss* of agricultural lands.
- 5 Address the loss of productive agricultural lands APN # 244-100-080 that currently and historically have been farmed as part of the Pacific Union College School Farm. These parcels are noted to be Prime Crop land in the County’s Base Line Data Report, Chapter 10 Agricultural Resources, Map 10-2.
- 6 Address the economic impacts of loss of locally grown fodder crops that are relied upon by livestock owners.
- 7 Analyze whether the loss of this productive agricultural land and loss of these locally important crops will result in additional truck trips to obtain livestock feed.
- 8 Address the conflicts that arise from urban encroachment into primarily agricultural areas, including undesirable effects from normal farming activities such as dust, pesticide applications, noise, nighttime frost protection and harvest activities.
- 9 Does this Project in any way conflict with any existing Williamson Act contracts?

COMMUNITY CHARACTER

AESTHETICS and VISUAL RESOURCES

- 1 Will the developer provide a computer simulation of the Project plan?
- 2 Will on-site visual demonstration methods of the height and volume of the Project areas be required to assess the Project impact on the current open space of the Angwin basin?
- 3 The community does not want to lose the view of the night sky due to light pollution. Evaluate new sources of light and glare impacts associated with all areas of the Project including pedestrian walkways, parks and greens, play fields, commercial areas, the 20-unit Inn, and the B&B.
- 4 Howell Mountain Road is a County Designated Scenic Roadway. Analyze how the proposed project will comply with the Viewshed Protection Program (Napa County Code Title 18.106).
- 5 Address the proposed conversion of Angwin's rural community character, with homes individually constructed on ½ acre or more and typically set back from view, to a suburban community of densely spaced townhouses and homes on small parcels and with multiple three-story buildings.
- 6 What signage will be added to Angwin? What review will occur?
- 7 The Project proposes hundreds of solar panels, generally not considered aesthetically tolerable. How will they be concealed from the view of passersby on Howell Mountain Road and those looking down on Angwin from Sentinel Hill or Brookside Drive?

NOISE

- 1 Identify all noise-sensitive receptors (e.g. senior centers, schools, etc) that will be impacted by the Project both during the entirety of construction phases and at the conclusion of Project. Include traffic noise impacts on Deer Park Road, Sanitarium Road, Howell Mountain Road, White Cottage Road, Cold Springs/Las Posadas Roads and College Avenue.
- 2 Construction is anticipated to last approximately 7-10 years. What are the noise impacts from the construction phases of the Project components? How will echoing noise be mitigated? What will be the exposure to ground-borne vibration or ground-borne noise levels to existing residents and college students?
- 3 In what ways will the permanent increase in noise in the Project vicinities impact wildlife?
- 4 What are the proposed airplane noise mitigation measures for Project neighborhoods?

AIR QUALITY

- 1 Analyze air quality trends for Howell Mountain area. How is air quality monitored for the Angwin area? Evaluate the potential impact of air quality effects during construction phases and for the projected traffic generated by the Project.
- 2 Evaluate potential sources and impacts of odors, toxic air contaminants and pollutant concentrations, including local carbon monoxide impacts. Specifically address exposure to “sensitive receptors”.
- 3 What type of heating is proposed for the Project? Will wood burning stoves be banned?
- 4 Currently there is no wood-burning stove problem. Will the cumulative impacts from air quality pollution create restrictions on current homes using wood for heat?
- 5 Will there be a cumulative impact from de-icing materials on the roads?
- 6 Will Bay Area Air Quality Management District J permits be obtained for all demolitions of existing structures?

CULTURAL-HISTORICAL RESOURCES

- 1 Address the impact to the value derived by the community from the nearly 100-year presence of open fields and productive agricultural lands at the heart of the Village. What investigations will be conducted to evaluate the preservation of historically and culturally significant agricultural lands for the community of Angwin?
- 2 Address the Loss of the historical landscape feature of crab apple trees, which line both sides of Howell Mountain Road, planted as gifts from PUC Alumni.
- 3 Address protection of any archaeological sites.
- 4 Analyze an “open space” Alternative for private or public purchase of the existing Angwin basin (south of current *Angwin Plaza*).

OPEN SPACE, RECREATION, and EDUCATIONAL RESOURCES

- 1 Address the traffic, noise and infrastructure impact of the new road and estate home parcels to the users of adjacent Las Posadas State Forest, including the 4-H Camp, day users, bikers and equestrians.
- 2 What cost/square feet increase will impact users of the current horse stables when new stables are in place? What will be the new fee structure? What will be the timetable for replacement of the stables? Will accommodation for the horses be provided while the stables are being rebuilt?
- 3 Address the impact of the loss of forest and farm lands for future educational/research opportunities, including the loss of opportunity to develop forest sustainability programs, sustainable livestock management programs and wildlife, habitat, watershed and environmental resource management programs.

GEOLOGY, SEISMICITY, and SOILS

- 1 What alteration will be made to the topography due to the Project development?
What will be the final grade elevation of Project sites?
- 2 Will any of the “*Village Neighborhood*” housing units be exposed or at risk of exposure to molds and mildew? The soil in the “*Village*” is very deep. This field is a catch basin for surface water. Existing commercial structures report water seepage up through the floors during heavy rains. (The tennis courts required drain tiles below)
- 3 What is the impact to impermeability on ground water recharge and increased storm water run off?
- 4 What impact will an underground parking structure have on topsoil, water table and geologic and seismic integrity? Could proposed Project construction result in on- or off-site landslides or other instabilities?
- 5 Will there be a higher priority need for County Public Works to conduct snow removal operations as a result of the increased population from this Project?
- 6 “*Seasonal ponds, freshwater marshes and ephemeral drainages are scattered throughout the Project site.*” (*, pg 4) How, specifically, will these resources be impacted in and by the *Mill Valley* proposal? How will vernal pools be protected? What will be the cumulative impacts of the Project components on the survivability of these resources?

PROJECT MITIGATION MEASURES - LEGALITY and ENFORCABILITY

As we all know, the California Court of Appeal has found that the Mitigation Measures must be binding for the necessary measures to be implemented in such a way as will effectuate the mitigation. The Project EIR must evaluate the suggested mitigations by the Project proponent for their feasibility.

- 1 Looking at all of the factors that must be mitigated with implementation of this Project and the PUC Campus Plan, does it make sense for this Project to go forward? If the answer is “yes”, please explain fully.
- 2 Please consider mitigations that will require contractors to use alternative fuels, new technology, lower emission engines and other methods as may be feasible -- no matter how much such action may seem otherwise inconsequential, such as turning off engines when not in use; and having all diesel delivery trucks servicing the Project to not be idle for more than five minutes per truck trip per day – and specify the resulting anticipated GHG reductions. Please use best available tools for evaluating the mitigation measures, such as I-Place, CACPO (Clean Air & Climate Protection Software), and/or Center for Clean Air Policy emissions calculator.
- 3 Discuss Project (*pg6) statement that the Project results in “*creating a sense of place...with a social commitment to the common good.*” Given the Project’s stated purpose from a social perspective, what is the probability of increased gang-related activity?
- 4 Discuss specifics on funding traffic-impact mitigations such as electric shuttle bus, free taxi rides, electric share cars and share bicycles. What will be the structure for ongoing management of these mitigation measures, the entity that will oversee these mitigation measures and the efficacy of these measures in offsetting the impacts of the Project? Will all persons living in Angwin area have access to these services?
- 5 “*At build-out the Eco-village will extract no more ground water than PUC has historically used, based on 20 year extraction data.*” (*pg10) What entity will monitor the ground water usage once the build-out has occurred? How will this mitigation measure be enforced?
- 6 Discuss the Project (*pg6) statement that the Project “*should educate its adults and children to understand and practice eco-literacy.*”
- 7 Substantiate the Project claim to mitigate VMT by creating jobs in Angwin.
- 8 Who will maintain the underground parking structure, e.g. graffiti removal?
- 9 Who will finance and manage the Community-supported farming?
- 10 Will Homeowner Association fees be collected to fund the above proposed mitigation measures? Who will run HOA? Are *affordable housing* units assessed HOA fees?

11 What is the proposed plan to address the relocation of current residents of on-campus housing including “*Mobile Manor*” and “*Brookside Apartments*”? How will the Project proposal (*pg7) statement “*that no one will lose equity in their existing home, or have to pay more for their new one*” be accomplished? Who will oversee the relocation of residents and who will be responsible for the long-term implementation of this promise? The EIR must contain specific details for this aspect of the Project.

ALTERNATIVES

A reasonable set of Alternatives is required by CEQA in addition to the applicant’s Project proposal. Please include:

- 1 The “No Project” alternative.
- 2 A project limited to three components: (1) 191 housing units on two parcels identified in the Napa County General Plan Housing Element (2004), (2) the on-campus (east of Howell Mountain Road) replacement housing identified in the current proposal, and (3) retention and revitalization of the 8.37-acre commercial area where it currently exists.

***Pacific Union College, Angwin Eco-village, Development Plan, July 18, 2007**