



CITY OF _____
ST. HELENA
_____ CALIFORNIA

Elections Code Section 9212 Report

Evaluation of the St. Helena Agritourism Initiative

Reviewed by the City Council on June 25, 2024



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I. EXECUTIVE SUMMARY

A. Overview of St. Helena Agritourism Initiative

On May 28, 2024, the St. Helena City Council requested that City staff and consultants prepare an analysis of a proposed ballot initiative, the St. Helena Agritourism Initiative ("Initiative"), which seeks to amend the City of St. Helena's General Plan, Zoning Ordinance and Municipal Code to facilitate development of a proposed 56-key resort on an 11-acre portion of the Charles Krug winery property ("St. Helena Resort") located at 2800 Main Street in St. Helena, California. As authorized under California Elections Code Section 9212, this report contains an analysis of the potential effects of the Initiative.

If approved, the Initiative would facilitate development of the proposed St. Helena Resort by direct voter approval rather than engaging in the environmental review process per the California Environmental Quality Act (CEQA), the legislative process for City Council approval of General Plan and Zoning amendments, and the development review and design review processes overseen by the Planning Commission. The Initiative includes specific policies, development standards, and "Environmental Design Features" (EDFs) that, if the Initiative is adopted, would be applied to development of the St. Helena Resort project and/or other development projects on the 11-acre site.

The Initiative, the full language of which is included in [Appendix A](#) of this report, and which is summarized below, would change the St. Helena General Plan, Zoning Ordinance and Municipal Code in the following ways:

- It amends the Land Use and Growth Management Elements of the General Plan to add a Winery & Planned Agritourism Overlay district ("WPA Overlay") and to allow "Large Parcel Agritourism Facilities" within the WPA Overlay.
- It amends the Public Facilities and Services Element of the General Plan to establish that "Large Parcel Agritourism Facilities" are not urban development and therefore do not require the extension of urban utility services.
- It amends the General Plan Land Use Map and Zoning Map to assign the new WPA Overlay designation to 11 acres on the Charles Krug winery property (i.e., the proposed St. Helena Resort project site).
- It amends the Zoning Code to add the WPA Overlay; define its purpose; define permitted uses and conditional uses; exempt certain development from the City's design review process; establish development standards; specify requirements for wastewater, water, retail and other uses; establish a Workforce Housing Obligation; and define Environmental Design Features (EDFs) that must be implemented within the WPA Overlay.

This report analyzes the topics described in Elections Code Section 9212(a) and other topics as requested by the City Council, as a means of identifying and disclosing potentially significant effects of the Initiative, prior to adoption by the City Council or action by the voters.

B. Summary of Findings of 9212 Report

- The Initiative is consistent with General Plan policies relating to Economic Sustainability and Circulation Element policies relating to bicycle and pedestrian amenities, car-free tourism, and transportation demand management programs for major employers.
- If the project were proposed through the normal entitlement process, it may present inconsistencies with General Plan policies relating to preservation of agricultural land and extension of urban development outside of the Urban Limit Line that would have to be addressed

in order for the project to move forward. However, the proponents are seeking to make an exception to these General Plan policies through the electoral process, which is allowed under California law.

- Additional hydrogeological analysis and information regarding measures that would be taken to reduce water usage would be needed to determine the extent to which the use of on-site wells for the project would impact the groundwater basin.
- The Initiative would exempt the resort project from the requirement to go through a formal design review and conditional use permit process. Instead, the Project would be subject to development standards included in the Initiative.
- The project would not affect the City's ability to provide housing to meet its Regional Housing Needs Allocation. If the Initiative is approved and a resort project is pursued, it would either result in construction of a minimum of 50 moderate-income rental units or payment of an Affordable Housing fee in accordance with Section 17.30.020 of the City of St. Helena Zoning Code.
- The project would contribute to increased congestion and a degradation of Level of Service (LOS) at the westbound approach of Deer Park Road/SR 29 and at the Silverado Trail/Deer Park Road intersection. The Initiative includes Environmental Design Features (EDFs) that would require the project to contribute to future intersection improvements at both locations.
- The project is expected to have a positive impact on both the local and regional economies.
- The peer review of the proponent's Air Quality analysis concurred with the conclusions that the project, with implementation of the Air Quality EDFs, would not result in significant, adverse impacts.
- The peer review of the proponent's Biological Resources analysis concurred with the need for additional studies and, possibly, permits from resource agencies to ensure that there are no impacts to wetlands and aquatic resources.
- The peer review of the proponent's Historic and Cultural Resources analysis recommends that a Historic Resource Evaluation (HRE) of the Charles Krug Winery Property should be completed prior to construction; that a qualified architectural historian complete a Secretary of the Interior's Standards for the Treatment of Historic Properties review.
- The peer review of the proponent's Historic and Cultural Resources analysis found that EDF 26 does not follow State law standards that would apply if this project were subject to CEQA and, as written, is not sufficient to reduce Project-related impacts on archaeological resources or Tribal cultural resources to a less-than-significant level. The peer review notes that the CRMP outlined in EDF 26 should be prepared because the property contains a Native American resource and is a State Historical Landmark and listed on the National Register of Historic Places (NRHP).
- The peer review of the proponent's Green House Gas (GHG) emissions report raised some questions regarding the inputs in the modeling and noted that the project did not include a Vehicle Miles Traveled (VMT) analysis that demonstrates it is exempt or below the BAAQMD/SB 743 target or the City of St. Helena's recently-adopted VMT thresholds.
- The peer review of the proponent's Noise analysis generally concurs with its conclusions.
- The peer review of the proponent's Traffic Analysis presented questions regarding the methodology and assumptions and recommends that additional traffic signal warrant analysis be conducted at the SR 29/Deer Park Road intersection.
- The peer review of the proponent's Civil Engineering/Utilities analysis found that the project has not demonstrated the feasibility of using on-site wells, and that in the event that water was to be provided by the City, the project would have to comply with all City requirements related to new

water connections, including but not limited to compliance with the City's water neutrality requirements.

- City staff review of the proponent's Workforce Housing Obligation and Proposal noted that site constraints pose serious challenges for the proponent's workforce housing concept (65 units on a 1.9-acre parcel at Fulton Lane and Railroad Avenue that is bisected by the railroad tracks). The review notes that Initiative provides no incentives for the proponent to pursue approval of a workforce housing project in a timely manner, thus making the default option of "making a payment for the purpose of furthering the City's affordable housing goals" rather than constructing workforce housing readily available. If the \$7/per square foot Affordable Housing Fee that is currently under review by the City is passed, it would yield an Affordable Housing Payment of approximately \$735,000.
- The City's review of the proponent's Economic & Fiscal Impact Analysis does not dispute the numbers or analysis in the report but presents refined revenue estimates that are specific to the City of St. Helena rather than regional. The analysis estimates that the project would generate revenue increases to the City's General Fund of nearly \$1.8 million per year on average for the first five years of operations as a result of increased property taxes, sales taxes, and transient occupancy taxes (TOT).

II. INTRODUCTION

A. Background

On March 13, 2024, the proponents of a ballot initiative (Noble House Hotels & Resorts) filed with the City of St. Helena, a Notice of Intent to Circulate an Initiative Petition and a request for the City Attorney to prepare the official ballot title and summary for the proposed ballot initiative, pursuant to Section 9200, et. seq. of the Election Code. The proponents are seeking City Council or voter approval of General Plan, Zoning and Municipal Code amendments to facilitate development of a 56-key luxury resort facility to be located on up to 11 acres of the Charles Krug Winery property located at 2800 Main Street in St. Helena, California.

On March 28, 2024, the ballot title and summary for the "St. Helena Agritourism Initiative" ("Initiative") were transmitted to the proponents. Subsequently, the proponents collected and submitted a sufficient number of signatures to qualify the Initiative for the ballot.

On May 28, 2024, the City Council accepted the City Clerk's certification of the sufficiency of the Initiative Petition and ordered the preparation of a study in accordance with Section 9212(a) of the Elections Code ("9212 Report"). Within 30 days of the certification of the petition and after reviewing this report, the City Council must either adopt the Initiative without any amendments or schedule an election for consideration of the Initiative by City voters.

B. Purpose of this 9212 Report

Elections Code 9212(a) authorizes the City Council to refer an initiative measure to a city agency or agencies for a report to evaluate the initiative's impact and effects prior to the Council's action to either adopt the Initiative or to order an election. The 9212 Report may examine the following effects of an initiative:

1. Its fiscal impact.
2. Its effects on the internal consistency of the City's General and Specific Plans, the consistency between Planning and Zoning, and the limitations on City actions under Section 65008 of the Government Code and Chapters 4.2 (commencing with Section 65913) and 4.3 (commencing with Section 65915) of Division 1 of Title 7 of the Government Code.
3. Its effects on the use of land, the impact on the availability and location of housing, and the ability of the city to meet its regional housing needs.
4. Its impact on funding for infrastructure of all types, including, but not limited to, transportation, schools, parks, potable water demand/usage, and open space. The report may also discuss whether the measure would be likely to result in increased infrastructure costs or savings, including the costs of infrastructure maintenance, to current residents and businesses.
5. Its impact on the community's ability to attract and retain businesses and employment.
6. Its impact on the uses of vacant parcels of land.
7. Its impact on agricultural lands, open space, traffic congestion, existing business districts, and developed areas designated for revitalization.
8. Any other matters the legislative body requests to be in the report.

As a voter-sponsored ballot measure, the Initiative is not subject to the California Environmental Quality Act (CEQA). The City Council's actions to either approve the Initiative as proposed, or to place the measure on the ballot are considered to be ministerial actions. Similarly, if the Initiative is approved by the voters, the amendments to the General Plan, Zoning Ordinance, and Municipal Code are considered to be

ministerial actions and, therefore, not subject to CEQA. In order to provide public information regarding potential environmental impacts associated with the Initiative and the St. Helena Resort Project, the proponents prepared an Environmental Assessment Report ([Appendix B](#)).

As requested by the City Council, this 9212 Report addresses the topics identified in Election Code Section 9212(a) and provides a peer review of the analysis presented in the Environmental Assessment Report prepared by the project proponents. It also provides a peer review of the Economic & Fiscal Impact Analysis ([Appendix D](#)) and the Workforce Housing Proposal ([Appendix C](#)) that were submitted to the City by the project proponents. This Report is organized in the following Chapters:

- I. EXECUTIVE SUMMARY
- II. INTRODUCTION
- III. PLANNING ANALYSIS OF AGRITOURISM INITIATIVE
- IV. REVIEW OF PROPONENT'S ENVIRONMENTAL ASSESSMENT REPORT
- V. REVIEW OF PROPONENT'S WORKFORCE HOUSING OBLIGATION AND PROPOSAL
- VI. REVIEW OF PROPONENT'S ECONOMIC & FISCAL IMPACT ANALYSIS

C. Overview of St. Helena Resort Project

The Initiative proponents are seeking City Council or voter approval of amendments to City of St. Helena laws governing new development to facilitate development of a 56-key luxury resort facility on 11 acres of the Charles Krug Winery property at 2800 Main Street in St. Helena, California. The St. Helena Agritourism Initiative would amend the St. Helena 2040 General Plan and the City of St. Helena Municipal Code, Title 17 ("Zoning Code") to create a Winery & Planned Agritourism Overlay Zone ("WPA Overlay") which would be applied to the project site. The new WPA Overlay would designate hotel and resort uses as permitted uses and would exempt them from any discretionary City development review processes (such as design review and/or conditional use permits). Instead, a hotel/resort project would be subject to compliance with the Zoning Code amendments and Environmental Design Features ("EDFs") included in the Initiative.

The proposed St. Helena Resort Project, as presented on the Initiative proponent's website (<https://sthelenaresort.com/overview.php>) would include up to 56 guest rooms spread across 12 single-story villas/bungalows and six two-story villas/bungalows, with two of the guest rooms to be located in refurbished, historic train cars facing the Napa Valley Wine Train tracks that bisect the larger winery property. Proposed resort amenities include meeting and event spaces, a spa, swimming pools, and a restaurant. The project would also include a train station or depot for the Napa Valley Wine Train. The WPA Overlay regulations limit the train station/depot to a maximum of 2,500 sq. ft. The project proponents have indicated that, per the California Public Utilities Commission (CPUC), the Wine Train operations are limited to a maximum of six trains per day, though under current operations "the number of trips per day is 3, comprising 2 daytime and 1 evening train." As proposed, the project would not connect to City utilities, but rather would utilize existing on-site wells for potable and emergency water supplies and an on-site package wastewater treatment system would be installed to serve the project.

The Initiative addresses affordable housing demand generated by the resort's estimated 100 employees by requiring that, prior to issuance of building permits for the resort, the applicant must submit an application to the City for development of a minimum of 50 rental housing units targeted to moderate-income households. The Initiative does not identify a site for the workforce housing and the housing project would be subject to a separate environmental and development review process. The Initiative establishes that, if the workforce housing project does not receive City approvals prior to the certificate

of occupancy for the St. Helena Resort project, the applicant would not be required to construct the housing units but rather, would make an in-lieu payment pursuant to the requirements of Section 17.30.020, "Affordable Housing Program" of the Zoning Code. If the workforce housing project is approved prior to issuance of a certificate of occupancy for the Resort project, the applicant would be required to construct the workforce housing within 24 months of the City's approval.

While the Initiative establishes the Workforce Housing Obligation and does not identify a specific project or site, the proponents submitted an affordable housing concept to the City on June 3, 2024. [Appendix C](#) includes the narrative description and Concept Plan for a potential 64-unit moderate-income rental housing project on a 1.9-acre site located south of Fulton Lane on both sides of the Napa Valley Wine Train right-of-way.

D. Summary of Agritourism Initiative

The St. Helena Agritourism Initiative is presented in [Appendix A](#). The Initiative seeks to establish a new WPA Overlay in the City's General Plan and Zoning Code which can only be applied on up to 11 acres of large parcels that are more than 110 acres in size, located within City limits but outside the City's Urban Limit Line, are located in the Winery (W) zoning district; have existing active agriculture and winery uses, and are served by an existing railroad line. If the Initiative is adopted, the WPA Overlay would be applied to 11 acres of the Charles Krug winery property at 2800 Main Street. The project site is located along the existing rail line and comprised of mostly open, fallow acreage bordered by Deer Park Road on the north and the winery access road on the south.

As discussed in Chapter III of this report, the Initiative would amend the City of St. Helena's General Plan and Zoning Ordinance to:

- Modify several General Plan policies to address "Large Parcel Agritourism Facilities as permitted by an agritourism overlay district."
- Establish the Winery and Planned Agritourism Overlay (WPA Overlay), which can only be applied on up to 11 acres of large parcels in excess of 110 acres located within city limits but outside of the City's Urban Limit Line (ULL) with existing active agriculture and a winery and served by an existing railroad line.
- The WPA Overlay would be applied to the property known as the Charles Krug Winery located at 2800 Main Street in the City of St. Helena certain property to facilitate the development of up to a 56-room resort with meeting rooms, event spaces, swimming pools, an on-site spa, and a restaurant.
- The Initiative includes 92 specific Environmental Design Features (EDFs) that address potential environmental issues, including aesthetics, air quality, biological resources, cultural and historic resources, energy efficiency, flooding, geology, contamination, noise, public services, traffic, utilities, water, water quality, and wastewater. The Initiative requires the proposed project to adhere to and implement the EDFs.

III. PLANNING ANALYSIS OF AGRITOURISM INITIATIVE

A. Consistency with the St. Helena 2040 General Plan

1. Summary of General Plan Amendments included in the Initiative

The St. Helena 2040 General Plan is the City's long-term planning "blueprint" that sets forth the City's goals and policies upon which its land use decisions are based. It has both broad general goals, as well as specific policies and implementing actions (i.e., programs). Generally, a city may not approve a zoning change or a development project unless it is consistent with its general plan. California law requires there to be consistency between the various elements making up a general plan and between the general plan and the zoning code. The Initiative includes both General Plan amendments and Zoning Code amendments.

The Initiative includes six specific General Plan amendments as follows:

- The **definition for the Agriculture (AG) land use designation** in the Land Use and Growth Management Element, Section 2.2, Community Development Framework, Community and Natural Resource Areas (p. 2-15) would be amended to add the following verbiage:

Large parcels in excess of 110 acres with existing active agriculture and a winery located within the City limits but outside of the Urban Limit Line that are served by an existing railroad line may be designated with an agritourism overlay district allowing the parcel to utilize up to 11 acres for agritourism facilities with overnight accommodations ("Large Parcel Agritourism Facility").

- Three policies in the Land Use and Growth Management Element, Section 2.5 would be modified as follows:
 - **Policy LU 1.2** would be amended to specify that development of a Large Parcel Agritourism Facility in an agritourism overlay district of up to 11 acres outside of the Urban Limit Line shall not be considered "urban development."
 - **Policy LU 5.3** would be amended to exempt Large Parcel Agritourism Facilities as permitted by an agritourism overlay district from strict limitations on development on properties that are designated as agricultural land.
 - **Policy LU 5.6** would be amended to allow Large Parcel Agritourism Facilities to locate in the city if their location does not adversely impact surroundings, uses, or city services or the quality and character of the community.
- One policy and one implementing actions in Public Facilities and Services Element, Section 4.5 would be modified as follows:
 - **Policy PF 2.2** would be amended to clarify that extension of City sewer services is not required for Large Parcel Agritourism Facilities.
 - **Implementing Action PF 2.C** would be amended to clarify that Large Parcel Agritourism Facilities are not urban development and do not require extension of municipal urban services, provided that wastewater treatment is provided by an on-property package water reclamation system sized for project serving flows in the form of a membrane bioreactor or similar system that is capable of providing tertiary level water quality treatment, and there is adequate water from existing on site wells to provide potable water; emergency systems water and irrigation water shall be supplied by recycled water and supplemented by on site wells as needed.

2. General Plan Policies and Implementing Actions Addressed by the Initiative

General Plan Policies & Implementing Actions	Analysis of Consistencies
<p>Policy ES 1.4 Encourage the creation of workforce housing to support the local employment base in keeping with small town smart growth.</p>	<p>The WPA Overlay includes a Workforce Housing Obligation requiring either construction of at least 50 units of rental affordable housing targeted to moderate income households or payment of the otherwise applicable affordable housing impact fee in accordance with the requirements of St. Helena Municipal Code Section 17.30.020.</p>
<p>Policy ES 2.1 Support the development of responsible, visitor-serving components to the City's economy as a valuable source of jobs, tax revenues, and cultural amenities. Promote policies that facilitate and encourage this type of sustainable economic development.</p>	<p>The proposed St. Helena Resort project is a visitor-serving facility that would provide jobs, tax revenues and other contributions to the local economy.</p>
<p>Policy ES 2.2 Encourage visitor-serving uses oriented toward an upscale market, consistent with the Valley's reputation as a producer of world-class wines. Discourage the introduction of uses that are dependent upon a mass tourist market.</p>	<p>The proposed St. Helena Resort project is a luxury resort targeted to an upscale tourism market.</p>
<p>Policy CR 1.7 Explore the use of the rail corridor to reduce traffic, including working with the owners of the Wine Train to consider the possibility of developing hospitality and other tourist-oriented uses that are primarily accessed by passengers riding on the Wine Train Corridor.</p>	<p>The St. Helena Resort project presents an opportunity for the rail corridor to provide an alternative mode of transportation for visitors.</p>
<p>Implementing Action CR 3.D Work with the wine and hospitality industries, including the Wine Train, to manage congestion and create and promote car-free tourism services.</p>	<p>The St. Helena Resort project presents an opportunity for the Napa Valley Wine Train and the resort to promote car-free tourism services by providing shuttle service between the train depot at the resort, downtown St. Helena, and other tourist destinations.</p>
<p>Implementing Action CR 2.C Require any new development and modifications to existing projects to provide bicycle and pedestrian</p>	<p>The Initiative includes several EDFs relating to bicycle and pedestrian amenities and improvements, including EDF 75 which requires</p>

General Plan Policies & Implementing Actions	Analysis of Consistencies
improvements and amenities, consistent with adopted Engineering Standards and the St. Helena Bicycle Plan.	the developer to construct an 8' wide paved bicycle and pedestrian trail within the railroad right-of-way between the resort site and Fulton Lane.
Policy CR 3.1 Provide incentives and encourage existing major employers to develop and implement transportation demand management (TDM) programs to increase the number of people who bike, walk, and take transit to work and reduce peak- period trip generation.	The Initiative includes EDF 66 which required preparation and implementation of a TDM Plan to encourage reduced reliance on single occupant vehicles.

3. Potential Inconsistencies with General Plan Policies and Implementing Actions

The following table identifies General Plan Policies and Implementing Actions that would pertain to the project if it were proposed through the normal entitlement process and may present potential inconsistencies if that were the case.

General Plan Policies & Implementing Actions	Analysis of Potential Inconsistencies
Policy LU 1.1 - Require new development to occur within well-defined boundaries and be consistent with the ability to provide urban services. New development should mitigate infrastructure impacts by using sustainable, best management practices in green building and stormwater management and paying its share of development impacts fees, while minimizing impacts on sewer, water, energy and natural resources.	The Initiative modifies Policy LU 1.2 (see above) to allow "Large Parcel Agritourism Facilities" (such as the proposed St. Helena Resort) to occur outside the Urban Limit Line.
Policy LU 5.1 - Discourage conversion of existing farmland to non-agricultural uses.	The project would convert up to 11 acres of land that is designated "Prime Farmland" to visitor-serving uses. The Initiative modifies Policy LU 5.3 (see above) to allow Large Parcel Agritourism Facilities as permitted by an agritourism overlay district on lands that are designated for agricultural uses.
Implementing Action LU 5.F - Where proposed residential, commercial, or industrial	The Agritourism Overlay District regulations and the EDFs do not establish requirements for a

General Plan Policies & Implementing Actions	Analysis of Potential Inconsistencies
<p>development abuts lands devoted to agricultural use, require the non-agricultural uses to incorporate buffer areas to mitigate potential land use conflicts as a condition of approval for subdivisions or use permits. The type and width of buffer areas shall be determined by the City based on the character, intensity, and sensitivity of the abutting land uses. Prepare and adopt guidelines and regulations to assist in the determination of the appropriate type and scope of agricultural buffer areas needed in circumstances that warrant the creation of such buffer areas.</p>	<p>buffer area between Large Parcel Agritourism Facilities and adjoining agricultural uses.</p>
<p>Implementing Action LU 5.G - Evaluate all discretionary land use applications, rezonings, and/or General Plan amendments, including those outside the Urban Limit Line, to determine their potential for impacts on Prime Farmland, Unique Farmland, or Farmland of Statewide Importance mapped by the State Farmland Mapping and Monitoring Program and avoid converting these farmlands where feasible. Where conversion of farmlands mapped by the state cannot be avoided, require long-term preservation of at least one acre of existing farmland of equal or higher quality for each acre of state-designated farmland that would be rezoned or redesignated to non-agricultural uses. This protection may consist of establishment of farmland easements or other similar mechanism, and the farmland to be preserved shall be located within the city and preserved prior to approval of the proposed discretionary land use application rezoning, or General Plan amendment.</p>	<p>The Initiative would establish an Agritourism Overlay District on approximately 11 acres of the Charles Krug winery property that are designated as Prime Farmland by the State Farmland Mapping and Monitoring Program, and it would allow for development of a resort within that area.</p> <p>If this project were required to secure discretionary entitlements under this policy, the proponents would need to provide for the long-term preservation of at least 11 acres of Prime Farmland through the establishment of farmland easements or other similar mechanism.</p> <p>The Initiative does not address farmland easements.</p>
<p>Implementing Action LU 5.I Establish a Farmland Mitigation Program for future development that requires the permanent protection of farmland at a 1:1 ratio of the amount of farmland converted. The program should include provisions for the acquisition of agricultural conservation easements and payment of in-lieu fees as potential methods of farmland mitigation, where eligible agricultural</p>	<p>As discussed under LU 5.G, above, the Initiative does not provide for the permanent protection of farmland at a 1:1 ratio of the amount of farmland converted.</p>

General Plan Policies & Implementing Actions	Analysis of Potential Inconsistencies
mitigation lands must be located within the State of California and be of comparable or better soil quality than the land being converted, and in-lieu fees are to be used for the acquisition of a conservation easement, including costs associated with the transaction and long-term maintenance.	
<p>Implementing Action PF 1.E Permit no new development relying on groundwater unless and until it is determined that the incremental production of ground water to support the development will not adversely impact the water production capability of the aquifer supporting the City wells.</p>	<p>The Initiative (EDF 79) establishes that potable water for the resort would be provided by existing on-site wells and specifically exempts the maintenance, modification or reconstruction of such wells from the requirement to obtain a permit under St. Helena Municipal Code Section 13.16.060. EDF 80 requires that a hydrogeological report be prepared prior to issuance of a building permit to demonstrate that the use of existing groundwater well(s) will not adversely impact the water production capability of the City. This issue is addressed in more detail in Chapter IV, M of this 9212 Report.</p>
<p>Implementing Action CR 1.G Subject all rail corridor uses to use permit review; locate passenger facilities within zoning districts which minimize impacts to established and proposed land uses.</p>	<p>The Initiative identifies “a train station or depot up to 2,500 sq. ft. for passenger and guest use, if associated with a hotel or resort” as a permitted use. No conditional use permit would be required.</p>

B. Consistency with the St. Helena Zoning Code

The Agritourism Initiative amends the City of St. Helena Zoning Code to establish a Winery and Planned Agritourism Overlay (WPA Overlay) which can be applied to up to 11 acres on parcels that are within the Winery (W) zoning designation that are "in excess of 110-acres with existing active agriculture and a winery located within the City but outside of the Urban Limit Line and that are served by an existing railroad line." The Charles Krug Winery parcel is the only property within the City of St. Helena that meets these requirements.

Permitted and Conditional Uses in the WPA Overlay. The WPA Overlay allows the following uses that are not currently permitted in the Winery zoning district:

- Hotel and resort uses with no more than 56 guest rooms;
- Uses accessory to hotel, resort, including but not limited to spa, restaurant, bar, up to 11,000 square feet for meeting rooms or related spaces, or similar uses, with transient overnight accommodations.

- Train station or depot up to 2,500 square feet for passenger and guest use, if associated with a hotel or resort.

These uses are designated as Permitted Uses in the WPA Overlay which means that they would be allowed by-right without the need to obtain a Conditional Use Permit (CUP) from the City zoning administrator or planning commission.

The Initiative notes that uses that are defined as Conditional Uses in the Winery zoning district (such as warehouses, wineries, tasting rooms, winery event centers and winery visitor centers) would still be required to obtain a CUP when located within the WPA Overlay.

Design Review Exemption. The Initiative exempts the Permitted Uses (i.e., hotel/resort and related uses, as listed above) in the WPA Overlay from the City's design review requirements and procedures. It states that design review would be required for buildings that also require a CUP, with the following caveat:

"...no decision-making bodies or officials may use Design Review intentionally or inadvertently to prohibit, unduly restrict, or reduce uses, building types, number of maximum allowed units, density, or height of structures allowed in the WPA Overlay, or to require changes from or impose any conditions inconsistent with standards in this Chapter."

Section 17.21.060.D of the new WPA Overlay regulations also states:

Design Review shall not be required for adjacent new construction meeting the requirements of Section 17.21.060(G)(6).

It is unclear what "adjacent new construction" means. Section 17.21.060(G)(6) is reference to the EDFs that are established in the Initiative.

Design Standards for the WPA Overlay. The WPA Overlay establishes Development Standards, including a 45' height limit; 50% building coverage limit, 0.3 FAR (floor area ratio); and a building area limit of 105,000 sq. ft. The new WPA Overlay regulations (Section 17.21.060.F.1) establish the following design standard:

"The design of the building and site shall substantially conform to all applicable development standards, requirements and Environmental Design Features in this Section; materials and colors shall be used in a manner that creates a visually cohesive design; roof design; building massing, and building articulation treatments shall be applied on are [sic] all sides of the buildings; and shall be compatible with the character, including any historic considerations, of the site."

The EDFs for Aesthetics are:

9) After completion of site grading, the slopes along Deer Park Road and the St. Helena Highway (CA-128 W/CA-29 N) shall be vegetated with a plant palette that is selected and planted appropriately based upon adaptability to the Project's climatic, geologic, environmental, and topographic conditions. All landscaping shall be maintained by the Applicant in good condition.
10) Planted areas shall be irrigated with recycled water to the extent available and feasible.
11) Accessory Project facilities such as trash bins, storage areas, etc., shall be screened from view from adjacent off-site residences to the extent feasible.

12) A minimum of 20% of the Property must remain maintained landscaping and shall be kept in a weed-free condition.

13) Exterior lighting shall be directed or shielded to prevent glare onto the public roadway or adjacent properties.

14) The Applicant shall provide details of all proposed fencing, walls, and gates on all plans submitted, which shall comply with any applicable building standards.

Landscaping. The WPA Overlay requires landscaped setbacks in accordance with "generally applicable provisions of Chapter 17.25" which is the Landscaping chapter of the Zoning Code.

Parking. The WPA Overlay states:

Parking for hotel use shall be a minimum of 77 parking spaces and may be provided on site or off-site on an adjoining parcel subject to a long-term joint-use parking agreement. Parking and loading shall comply with the generally applicable Parking Area and Access Design Standards in Section 17.26.050. Electric vehicle charging stations and EV-capable parking shall conform to Section 17.26.090, as required.

Section 17.26.040.A of the Zoning Code establishes the minimum number of off-street parking spaces for each use type. Hotels are required to provide a minimum of one space per guest room plus one space for each three employees. Based on 56 guest rooms and an estimated 100 employees, this would yield a requirement for 89 parking spaces. The proposed minimum of 77 parking spaces would not meet the parking standards in the Code.

Additionally, restaurants and bars are required to provide one space for every four seats. Without more information regarding the size of proposed restaurants and bars and an analysis of the potential for "shared parking" reductions in demand, it is not possible to determine how many parking spaces would be sufficient.

Affordable Housing. An analysis of the Initiative proponent's Affordable Housing proposal and its consistency with zoning requirements is presented in Chapter V of this 9212 Report - Review of Proponent's Workforce Housing Obligation and Proposal.

C. Effects of Initiative on the limitations on City actions under Government Code Section 65008 and Chapter 4.2 (commencing with Section 65913) and Chapter 4.3 (commencing with Section 65915) of Division 1 of Title 7 of the Government Code

Government Code Section 65008. Government Code Section 65008 prohibits a city from discriminating against a residential development or emergency shelter for various reasons. Based on City staff's reading of the proposed Initiative, Government Code Section 65008 is inapplicable.

Government Code, Division 1, Title 7, Chapters 4.2 and 4.3. Chapters 4.2 (commencing with Section 65913) and 4.3 (commencing with Section 65915) encourage the development of new housing by allowing or requiring local agencies to enact ordinances that expedite the residential development process, ensure

sufficient land is zoned at densities high enough for the production of affordable housing, and assure diligence in providing density bonuses, concessions and incentives to facilitate the development of affordable housing.

The Initiative and its associated General Plan and Zoning amendments would not impact the potential for residential development within the City of St. Helena. The WPA Overlay would allow all uses permitted by the underlying zoning district. The 11-acre portion of the Charles Krug Winery property that would be assigned the WPA Overlay does not have any existing or planned future housing on it and its potential for new housing is limited. The Winery (W) zoning designation allows a single-family dwelling as a use accessory to an agricultural use and agricultural employee housing. The St. Helena Resort project would not preclude these uses.

The Initiative establishes a Workforce Housing Obligation that is linked to issuance of a building permit for a resort/hotel project within the WPA Overlay. If the Initiative is approved and a resort project is pursued, it would either result in construction of a minimum of 50 moderate-income rental units or payment of an Affordable Housing fee in accordance with Section 17.30.020 of the City of St. Helena Zoning Code.

As explained in Chapter VI, Analysis of Proponent’s Workforce Housing Obligation and Proposal, the workforce housing concept plans submitted by the proponent (for a 65-unit moderate-income rental project on a 1.9-acre site on Fulton Lane) would require General Plan and Zoning amendments and would not be eligible for a density bonus, incentives or concessions.

D. Effect of Initiative on the use of land, uses of vacant parcels of land, the impacts on the availability and location of housing, and the ability of the city to meet its regional housing needs

Existing Conditions and Land Uses. The 11-acre portion of the Charles Krug Winery parcel, which is the subject of the Initiative and the site of the proposed St. Helena Resort project, is currently relatively level, mostly open, fallow land. It is located immediately north of the existing winery and is bordered by Deer Park Road on the north. It encompasses several rows of an existing vineyard and is part of a 140-acre agricultural parcel that includes vineyards and a winery.

Under the existing Agriculture (AG) General Plan classification and Winery (W) zoning designation, the uses of the property are restricted to agricultural and winery-related uses. The Initiative and the WPA Overlay would allow “Large Parcel Agritourism Facilities” which includes hotel/resort and other tourism-related uses. While this change in use would not directly impact the availability and location of housing since residential uses on lands designated AG and W are limited to those directly related to agricultural uses, the proponents of the Initiative have indicated that the proposed St. Helena Resort project would have approximately 100 employees. To the extent that many of these employees likely do not currently reside within St. Helena, the project would indirectly impact the demand for housing in the community.

The Initiative includes a Workforce Housing Obligation which would either result in construction of at least 50 moderate-income rental housing units or payment of an Affordable Housing fee. Please see Chapter VI, Analysis of Proponent’s Workforce Housing Obligation and Proposal for more information regarding fulfillment of the Workforce Housing Obligation.

The Charles Krug Winery property is not designated in the City’s Housing Element as a site to accommodate the City’s regional housing needs allocation (“RHNA”) and the Initiative would not affect the City’s ability to meet its regional housing needs.

E. Impact of Initiative on agricultural lands, open space, traffic congestion, existing business districts, and developed area designated for revitalization

Impacts on agricultural lands and open space. If the Initiative is approved, future development of a resort on a portion of the Charles Krug Winery property, which is outside of the City’s Urban Limit Line and designated “Prime Farmland,” would convert 11 acres from current agricultural and open space uses to visitor-serving uses.

It should be noted that there are provisions in the Initiative related to open space. EDF 12 requires that at least 20% of the resort site be used for landscaping. EDF 75 requires the developer to construct an 8’ wide paved bicycle and pedestrian trail along the rail line from the project site to Fulton Lane. While there are references to “a one-acre landscape buffer” in the Environmental Assessment Report, the requirement for a buffer is not included in the Initiative.

Chapter III, Section A of this report, Consistency with the St. Helena 2040 General Plan, addresses the project’s consistency with the City’s land use policies aimed at preserving agricultural lands.

In this case, the proponent’s justification for conversion of agricultural land is economic - the City of St. Helena’s Financing Civic Infrastructure Task Force concluded (in May 2020) that two new hotels within the city limits are essential to the creation of new revenue streams to address on-going budgetary challenges and to help finance the City’s many infrastructure needs.

Impacts on traffic congestion. The proponent prepared a traffic study for the Environmental Assessment Report (WTrans, March 2024) which indicates that under existing conditions, the westbound Deer Park Road approach to SR 29 operates unacceptably at Level of Service (LOS) F. Under future and future + project scenarios, it would continue to operate unacceptably, and the Silverado Trail/Deer Park Road intersection would operate unacceptably at LOS F during the weekday peak hour. The Initiative includes EDF 70 that requires the applicant to pay its proportional share of the cost of a signal at the SR 29/Deer Park Road intersection at the time that the City constructs a signal. EDF 71 states that if the County of Napa changes the existing signal at Silverado Trail/Deer Park Road from flashing red operation to normal signal operation, the Applicant is required to cover the cost of striping improvements necessary to implement the change.

The EDFs include a number of transportation demand management and other measures to minimize traffic-related impacts. A discussion of traffic impacts is included in the proponent’s Environmental Assessment Report (EAR). Chapter IV (L) of this report summarizes the EAR and the findings of a peer review of the traffic analysis.

Impacts on existing business districts and developed areas designated for revitalization. The Initiative proponents submitted an Economic and Fiscal Impact Analysis (Economic Forensics & Associates; April 2024) for the proposed St. Helena Resort project. Chapter VI of this 9212 Report provides an overview of the proponents’ Economic and Fiscal Impact Analysis and an independent peer review that was commissioned by the City.

The project is expected to have a positive economic impact on existing businesses in St. Helena. There are no areas designated for revitalization in St. Helena. During the construction phase, the local economy will benefit from worker spending and materials, equipment and services sourced from local merchants as needed. The estimated project cost assigned to St. Helena based on estimated spending in St. Helena is \$71.1 million with an estimated 339 full-time equivalent construction-related workers paid approximately \$23.6 million in wages. The spending and jobs on-site support another five jobs and over \$977,500 in additional incomes earned throughout St. Helena, including another \$459,400 in wages and salaries for St. Helena residents.

Daily operations also have “multiplier” or additional effects on St. Helena’s economy, as visitors come to the resort and subsequently spend time and money at other local restaurants, wineries, retailers, and merchants while in St. Helena.

F. Impacts of Initiative on the community's ability to attract and retain businesses and employment

As discussed above, the Economic and Fiscal Impact Analysis indicates that the proposed resort would result in visitors and overnight guests spending money at other businesses in the City, supporting the local economy and helping to attract and retain local retail and restaurant businesses.

The proponent estimates that the proposed resort would employ approximately 100 persons which is a sizable addition to the City’s employment base.

G. Impacts of Initiative on funding for infrastructure of all types, including, but not limited to, transportation, schools, parks, and open space

The project would be required to pay development impact fees in accordance with the City’s adopted fee schedule as well as school impact fees to the St. Helena Unified School District. Perhaps more importantly, the increased transient occupancy tax, sales tax and property tax revenues generated by the project would contribute to the City’s General Fund and could be used to support a variety of infrastructure maintenance, repair and upgrade projects. As noted in the proponent’s Economic and Fiscal Impact Analysis, total tax revenues from the resort for the City of St. Helena range from \$3.02 million in year 1 to over \$4.48 million in year 5 based on room revenue, spending at the resort and throughout St. Helena.

IV. REVIEW OF PROPONENT’S ENVIRONMENTAL ASSESSMENT REPORT

A. Introduction

In assembling this 9212 Report, the City of St. Helena consulted with a number of qualified specialists to provide peer review analysis of various topics addressed in the proponent’s Environmental Assessment Report (EAR) and the associated Environmental Design Features (EDFs) within the St. Helena Agritourism Initiative. Each section below consists of the following three parts:

1. A summary of the EAR’s findings on a given issue area. This summary is excerpted directly from the EAR, and as such was prepared by the project proponents. Details regarding the methodology and findings of this analysis can be found in the EAR itself ([Appendix B](#)).
2. A list of relevant EDFs that relate to each topic area. The St. Helena Agritourism Initiative, if passed into law, will not be subject to environmental review under the California Environmental Quality Act (CEQA). As such, these EDFs are meant to account for environmental concerns that would otherwise be identified and mitigated through the environmental review process. The full list of EDFs in their original context can be found in the Initiative ([Appendix A](#)).
3. A summary of the conclusions reached in the peer review report. Note that these summaries are not exhaustive and may be paraphrased or lightly edited for content. Furthermore, the views expressed in the peer reviews represent the opinions of the authors, and do not necessarily represent the position of the City of St. Helena. The full peer review reports are attached to this report ([Appendix E](#)).

B. Aesthetics

1. Summary of Aesthetics Findings in the Environmental Assessment Report

The following summary is an excerpt from the Environmental Assessment Report (EAR) prepared by the proponents of the St. Helena Agritourism Initiative:

The Agritourism Initiative would amend the Municipal Code to include a new Winery and Planned Agritourism (WPA) Overlay, which would contain development standards pertaining to aesthetic resources. The WPA would require the design of the building and site to be visually cohesive and compatible with the character of the site. The development standards would minimize the aesthetic impacts associated with development under the Agritourism Initiative. Furthermore, the Agritourism Initiative includes 6 Environmental Design Features (EDFs), which are specifically intended to preserve the aesthetic quality of the project site and surrounding area.

2. Proposed Environmental Design Features (EDFs) from St. Helena Agritourism Initiative

9) After completion of site grading, the slopes along Deer Park Road and the St. Helena Highway (CA-128 W/CA-29 N) shall be vegetated with a plant palette that is selected and planted appropriately based upon adaptability to the Project’s climatic, geologic, environmental, and topographic conditions. All landscaping shall be maintained by the Applicant in good condition.

10) Planted areas shall be irrigated with recycled water to the extent available and feasible.

11) Accessory Project facilities such as trash bins, storage areas, etc., shall be screened from view from adjacent off-site residences to the extent feasible.

12) A minimum of 20% of the Property must remain maintained landscaping and shall be kept in a weed-free condition.

13) Exterior lighting shall be directed or shielded to prevent glare onto the public roadway or adjacent properties.

14) The Applicant shall provide details of all proposed fencing, walls, and gates on all plans submitted, which shall comply with any applicable building standards.

3. Analysis of Aesthetics Impacts Associated with the Agritourism Initiative

A peer review analysis of the Aesthetic associated with the Initiative was not prepared for this 9212 Report. The analysis of the Initiative's consistency with the City's Zoning Code that is presented in Chapter III(B) of this 9212 Report explains that the proposed St. Helena Resort project would be exempted from the City's normal development review and design review processes. Under the Initiative, the project would be subject only to the development standards and EDFs included in the Initiative.

C. Air Quality

1. Summary of Air Quality Findings in the Environmental Assessment Report

The following summary is an excerpt from the Environmental Assessment Report (EAR) prepared by the proponents of the St. Helena Agritourism Initiative:

The air quality analysis indicates that the construction emissions from all construction activities would be below the recommended thresholds of significance for reactive organic gasses (ROG), nitrogen oxides (NOX), and exhaust particulate matter 10 micrometers or less in diameter (PM10) and 2.5 micrometers or less in diameter (PM2.5). However, to further reduce any potential construction emission impacts, the Agritourism Initiative would require development to implement EDF 15, which includes restrictions on construction vehicle idling, requiring various fugitive dust control measures, and conforming to applicable State and federal emission standards for construction equipment.

Operational emissions would include area, energy, and mobile sources. Operation of the proposed project would be well under the Bay Area Air Quality Management District's (BAAQMD's) daily threshold for operation emissions. The Agritourism Initiative would require development to implement EDF 16, which would incorporate various sustainable design elements and guidelines to promote energy efficiency and other conservation measures. ([Appendix B](#), p. 3)

2. Proposed Environmental Design Features (EDFs) from St. Helena Agritourism Initiative

15) Prior to the issuance of a grading permit for a Project, the Applicant shall submit a grading plan for review and approval by the City Planning Division. The following specifications shall be included in a Construction Management Plan with the permit application(s) to reduce short-term air quality impacts attributable to the on-site and off-site construction activities:

- a. During all construction activities, all architectural coatings applied shall contain a low content of volatile organic compounds;
- b. All construction equipment shall be maintained and properly tuned in accordance with manufacturers' specifications. Equipment maintenance records shall be kept onsite and made available upon request by the City
- c. All material excavated, stockpiled, or graded (including unpaved areas and roads) shall be sufficiently watered to prevent fugitive dust from leaving property boundaries and causing a public nuisance or a violation of an ambient air standard;
- d. All onsite vehicles shall be limited to a speed of 25 miles per hour on unpaved roads;
- e. All land clearing, grading, earth-moving, or excavation activities on the Project site shall be suspended when sustained winds are expected to exceed 25 miles per hour;
- f. All trucks hauling dirt, sand, soil, or loose material shall be covered or shall maintain at least 2 feet of freeboard (i.e., minimum vertical distance between top of the load and the trailer) in accordance with the generally applicable requirements of the California Vehicle Code;
- g. Fossil fuel based off-road construction equipment and all construction vehicles shall be prohibited from idling for periods longer than 5 minutes when not in use;
- h. During Project construction, all construction equipment shall conform to applicable required state and federal emission standards. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than applicable required state and federal emission standards;
- i. During Project construction, electricity from power poles rather than temporary diesel- or gasoline-powered generators shall be used to the extent feasible;
- j. The Applicant shall prepare and implement a Construction Management Plan (CMP) for Project construction. Project construction contracts shall require compliance with the CMP. The CMP shall include, without limitation contractor contact information and responsibilities, typical construction hours, material storage and construction trailer locations, construction waste recycling program, construction equipment emissions requirements, dust control requirements, haul routes, any off-site construction parking plans, and construction traffic management plan (e.g., flag persons, signs);
- k. During Project construction, contractors shall implement fugitive dust control measures consistent with applicable Bay Area Air Quality Management District Regulations, as may be amended from time to time;
- l. Project Construction contractors shall be required to implement a recycling program for waste generated by demolition and construction activities to the extent feasible;

m. Project construction deliveries shall be scheduled, to the extent feasible, during off-peak traffic periods to encourage the reduction of trips during the most congested periods.

16) The Project shall incorporate various sustainable design elements and guidelines to promote energy efficiency and other conservation measures. The Project's sustainable design elements shall include, but are not limited to:

- a. Landscaping consistent with the generally applicable provisions of St Helena Municipal Code Chapter 17.25 xeriscape principles and site-specific plant materials. All landscaping shall be maintained by the Applicant in good condition;
- b. Irrigation with recycled water to the extent available and feasible;
- c. Recycling programs for construction-generated waste;
- d. Use of energy

17) The Applicant shall provide a tree protection plan prior to the issuance of a grading permit that shall include on the site plan the location of trees within the Project area and include a tree protection plan which shall be coordinated with any civil grading/drainage/improvement plans.

3. Conclusions of Air Quality Peer Review Report

A peer review of the Environmental Assessment Report's (EAR) analysis of air quality and the associated Environmental Design Features (EDFs) in the St. Helena Agritourism Initiative was performed by Illingworth & Rodkin, Inc. and is included as [Appendix E-1](#). The conclusions of the peer review analysis are as follows:

- **Methodology:** The air quality analysis in the EAR was based on use of the CalEEMod model recommended by the Bay Area Air Quality Management District (BAAQMD) in their latest CEQA Air Quality Guidelines. This is the appropriate model to use for this type of land use. The CalEEMod construction modeling was appropriately based on default conditions, given that construction details are not available.
- **Construction Materials:** It appears that emissions associated with the hauling of 16,700 cubic yards (CY) of import material were not included in the modeling. *However, this would add only a small amount of emissions that would not affect the results of the analysis that found emissions to be less than significant.*
- **Energy Emissions:** Page 68 of the EAR states that the "project would be all electric design," however, the CalEEMod modeling shows 192 metric tons are associated with natural gas usage. *If the project is committed to "all electric" with no natural gas infrastructure, then this is simply a slight overestimate in project emissions. Otherwise, this influences the findings for GHG (further discussion below, under Greenhouse Gas Emissions).*
- **Vehicle Emissions:** The modeling used the traffic study for mobile emissions, with daily trip generation as input representing all days of the week. The traffic study only provided weekday average daily trips but predicted peak hour trips for both weekday and weekend. Weekend peak-hour trips were much greater than weekday peak-hour trips. For this reason, the operational traffic emissions may be slightly underestimated if weekend daily trip generation is greater. *This should be checked, however, the effect one way or another would not alter the conclusions.*

- **Health Risk Assessment:** The analysis did not include a quantified health risk assessment and *we would agree that one is not necessary.*
- **Odor:** The air quality analysis in the EAR did not address odors. The project would include on-site wastewater treatment and reuse of reclaimed wastewater (page 83 of the EAR). There is no description of the treatment equipment or process. This potential source of odors should be identified and assessed in the air quality analysis. *We do not anticipate the odor assessment to lead to any significant impacts.*

D. Biological Resources

1. Summary of Biological Resources in the Environmental Assessment Report

The following summary is an excerpt from the Environmental Assessment Report (EAR) prepared by the proponents of the St. Helena Agritourism Initiative:

The project site’s ruderal and disturbed/developed land coverage types do not offer suitable habitat for most species. However, several California live oak trees are located within disturbance distance of the western and northern portions of the project site.

The oak trees and adjacent agricultural fields provide potential nesting, roosting, and foraging habitat for several species of birds and bats. The Agritourism Initiative includes 5 EDFs specifically intended to reduce impacts to jurisdictional waters, nesting birds, and roosting bats. ([Appendix B](#), p. 3)

2. Proposed Environmental Design Features (EDFs) from St. Helena Agritourism Initiative

18) Prior to issuance of a grading permit for Project work in or discharges to any federal and/or state jurisdictional waters, including wetlands, Applicant shall provide written evidence to the City of St. Helena that any applicable resource agency with jurisdiction has issued any required permits; such agencies may include U.S. Army Corps of Engineers (Corps), California Department of Fish and Wildlife (CDFW), Regional Water Quality Control Board (RWQCB), or any other applicable agency (e.g., California Department of Fish and Wildlife (CDFW)).

19) Project construction activities shall prevent the unpermitted discharge of sediment and/or muddy, turbid, or silt-laden waters into any on-site wetlands and/or other receiving water bodies, including off-site adjacent drainage ditches located immediately to the north and east of the Project. Project construction shall comply with the following:

a. A Stormwater Pollution Prevention Plan (SWPPP) shall be prepared to address best management practices (BMPs) that will be used to prevent erosion and sediment loss within the Project site. BMPs such as silt fence, mulching and seeding, and straw wattles will be placed where needed to prevent sediment from leaving the site during construction. Permanent stormwater management in the form of planting, mulching, and paving will be placed to address erosion after construction. Once construction is complete, the SWPPP will no longer be in effect;

b. Appropriate sediment control measures (e.g., silt fences, straw wattles) shall be in place prior to the onset of construction activities within waters of the United States and/or State and in

areas where there is a potential for surface runoff to drain into adjacent aquatic features and as required by the SWPPP;

c. Sediment control measures shall be monitored and maintained until construction activities have ceased;

d. Temporary stockpiling of excavated or imported material shall be placed as far away from any waters of the United States and/or State as practicable. Excess soil shall be used on site or disposed of at a regional landfill or other appropriate facility. Stockpiles that are to remain on the site through the wet season shall be protected to prevent erosion (e.g., silt fences, straw bales) as required in the SWPPP;

e. All waters of the United States and/or State temporarily impacted by construction activities shall be restored and revegetated, as close as practicable, to preconstruction contours and conditions;

f. Construction fencing shall be installed along the edges of the work zone adjacent to waters of the United States and/or State outside the construction area. All work and stockpiling of materials shall be confined to the Project disturbance area.

20) Birds, including but not limited to raptors such as white-tailed kite: If feasible, vegetation removal and/or construction shall be conducted between September 1 and January 31. If vegetation removal and/or construction activities is to occur during the nesting season (February 1 through August 31), a qualified biologist shall conduct a preconstruction survey no more than seven days before vegetation removal or construction activities begin. If an active nest is found, a non-disturbance buffer shall be established for a distance of 500 feet around the nest unless a smaller buffer zone is approved by CDFW. Construction may resume once the young birds have left the nest or as approved by the qualified biologist.

21) Bats, including pallid bats: If feasible, vegetation removal and/or construction shall be conducted between August 16 and March 31. If vegetation removal and/or construction activities is to occur during the roosting season (April 1 through August 15), a qualified biologist shall conduct a preconstruction survey no more than seven days before vegetation removal or construction activities begin. If an active roost is found, a non-disturbance buffer shall be established for a distance of 500 feet around the nest unless a smaller buffer zone is approved by CDFW. Construction may resume once the young have left the nest or as approved by the qualified biologist.

31) Serving or packaging to-go food materials in non-biodegradable polystyrene (i.e. Styrofoam/plastic foam) materials shall be prohibited.

3. Conclusions of Biological Resources Peer Review Report

A peer review of the Environmental Assessment Report's (EAR) analysis of biological resources and the associated Environmental Design Features (EDFs) in the St. Helena Agritourism Initiative was performed by WRA Environmental Consultants and is included as [Appendix E-2](#). The following is a summary of the conclusions of the peer review analysis:

- **Site Conditions:** The Project Area has been graded and/or otherwise disturbed multiple times, with the bulk of its area hosting a gravel (artificial) substrate or otherwise subject to substrate and vegetation maintenance. This history of modification precludes the potential for sensitive vegetation communities and special-status plants to occur on-site. Adjacent land covers are also disturbed and modified, and include vineyard blocks, roads, and the Charles Krug Winery facility to the east and southeast.

Aquatic Resources

- **Potential Wetland:** The EAR references a “potential wetland...within ruderal vegetation toward the northern end of the site” (p. 56) but provides no mapping and few details, other than the observation of standing water and some associated facultative plant species (those likely to occur in wetlands). The EAR concludes that a formal wetland delineation should be performed within the Project Area to determine if any features potentially jurisdictional to the U.S. Army Corps of Engineers (Corps) and/or state Regional Water Quality Control Board (RWQCB) are present. If any such features would be necessarily impacted to accommodate the Project, regulatory permits would be needed from the Corps and/or RWQCB. *The peer review concurs with the EAR regarding the need for an aquatic resources delineation, and stresses that the delineation should consider the history of modification in the Project Area and how this may affect a jurisdictional determination if any potential wetland features are present.*
- **Drainage Ditch:** The EAR states that “the adjacent drainage ditches appear to have a direct hydrological connection to the Napa River”. As per aerial photography, a linear drainage ditch is present along the northwestern boundary of the Project Area adjacent to Deer Park Road, and hydrologically connected to a ditch along Highway 128 (Main Street). Aerial photography suggests that the subject ditch connects directly to (drains into) the Napa River, approximately 0.24 mile to the northeast of the Project Area, although the ditch’s alignment is partially obscured by trees/vegetation and thus this connectivity is speculative. The ditch, including the section adjacent to the Project Area, also hosts associated oaks and other trees and shrubbery. As described in the EAR and shown in visual renderings, the Project will avoid the ditch system; the renderings also suggest that associated trees/vegetation along the ditch will be left intact. However, the EAR notes that the ditch may be subject to indirect and temporary impacts during construction, which could impact the Napa River (e.g., sediment discharges during construction), and references EDF 31 as the means to address such impacts. *The peer review recommends assessing the ditch system and its associated vegetation as a component of the aquatic resources delineation, including how to best preclude any adverse impacts if such is relevant. Furthermore, it recommends complete avoidance of the ditch and its immediate vicinity via the largest feasible setback. Avoidance should be clearly specified in the final description and plans for the Project.*
- **York Creek:** Also discussed in the EAR is York Creek, a tributary to the Napa River present along the southern boundary of a portion of the greater Charles Krug Winery property. Along the Napa River, York Creek supports a run of federal listed steelhead (*Oncorhynchus mykiss irideus*; central California coast ESU [evolutionary significant unit]; CDFW 2024, other sources) and is otherwise considered sensitive. York Creek is located approximately 1,090 feet (0.2 mile) from the Project Area at its closest point. *This setback is more than sufficient to preclude both construction and operational impacts to the creek.*

Special Status Species

- **Plants:** The Project Area has been used for agricultural and other purposes and subject to disturbance for decades. The peer review concludes that, although special-status plants are not

referenced in the EAR, the disturbed nature of the Project site indicates that such species are highly unlikely or have no potential to occur there or otherwise be impacted by the Project.

- **White-Tailed Kite:** EAR references EDF 20 (Nesting Birds) to address any potential impacts to this species. The peer review agrees with the EAR regarding potential impacts to white-tailed kites and finds that EDF 20 would sufficiently address potential impacts to this species.
- **Townsend's Big-Eared Bat:** This species roosts in caves, mines or secluded portions of buildings (also those abandoned or otherwise underutilized) and is unlikely to use trees on the Project site for roosting. Other bat species do have some potential to roost in the trees if suitable cavities/hollows are present, including pallid bat (*Antrozous pallidus*; state Species of Special Concern) as well as some non-status species. While EDF 21 is nonetheless generally suitable to avoid or otherwise minimize any potential impacts to bat roosts (if such are present), the stipulated default buffer of 500 feet is larger than what is typically recommended in such situations (e.g., CEQA mitigation measures). *The peer review report comments that a non-disturbance buffer of 150 feet would be sufficient.*
- **Summary Table:** While other special-status wildlife species are unlikely to occur within or adjacent to the Project Area, a summary table outlining which habitat elements are absent or other factors specific to each species known from the vicinity should be created.
- **Bird Nesting:** As implied in the EAR, native bird species with baseline legal protections under the federal Migratory Bird Treaty Act and California Fish and Game Code have the potential to nest within or adjacent to the Project Area. Primary nesting substrates would be in trees and larger shrubs, though nesting on the ground or low in ruderal vegetation cannot be ruled out if the site is left generally undisturbed. As such, *the peer review suggests that EDF 20 could be improved by including specific buffer sizes for different types of birds and the possibility of reducing the buffer size based on biologist observations.*

E. Historic & Cultural Resources

1. Summary of Historic & Cultural Resources Findings in the Environmental Assessment Report

The following summary is an excerpt from the Environmental Assessment Report (EAR) prepared by the proponents of the St. Helena Agritourism Initiative:

Development under the Agritourism Initiative would result in the following potential impacts to cultural resources: (1) The removal of a minimal number of historic vineyard rows associated with the National Register of Historic Places (NRHP) listed Charles Krug Winery; (2) Potential viewshed impacts to the Charles Krug Winery; (3) Modifications to the Napa Valley Wine Train/Southern Pacific Railroad Tracks on the project site; (4) Potential impacts to an Indigenous archaeological resource. The Agritourism Initiative includes seven EDFs which are specifically intended to protect historic, cultural, and Tribal Cultural Resources (TCRs) and requires the preparation of an Archaeological Treatment, Testing, and Curation Plan to assess the potential for presence of archaeological, paleontological and TCRs. (Appendix B, p. 3)

2. Proposed Environmental Design Features (EDFs) from St. Helena Agritourism Initiative

22) Prior to the issuance of a building permit, Applicant shall have a qualified architectural historian conduct and prepare viewshed and site analysis to demonstrate the Project design compatibility of the new adjacent and/or related new construction to any properties listed and/or eligible for the National

Register of Historic Places, California Register of Historical Resources, and/or potentially eligible as a State Historical Landmark and Point of Historical Interest. That analysis shall demonstrate that:

- a. New adjacent or related new construction by the Project to any properties listed and/or eligible for the National Register of Historic Places, California Register of Historical Resources, or potentially eligible as a State Historical Landmark and Point of Historical Interest will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired;
- b. The Project will avoid excavations or regrading of land adjacent to any historic building which could cause the historic foundation to settle, shift, or fail, or which could destroy significant archeological resources;
- c. Design of the Project's adjacent new construction to historic buildings will be compatible with the historic character of the site and preserves the historic relationship between the building or buildings and the landscape;
- d. New construction on or near the historic building site will avoid being visually incompatible in terms of size, scale, design, material, or color, which destroys historic relationships on the site, or which damages or destroys important landscape features, but will be differentiated from the historic building or buildings;
- e. Adjacent new buildings on a historic property or on an adjacent site will avoid being much larger than a historic building in close proximity, and avoid new buildings or groups of buildings that are not compatible with the character of the historic building;
- f. For development or redevelopment on a site that contains any structures over 45 years old, require a records search of the California Historical Resources Information System at the Northwest Information Center (NWIC) to determine the presence of historic resources. As warranted by the results of the records search, the Applicant shall also provide a historical significance assessment of structures over 45 years.

23) Any applicable California State Department of Parks and Recreation forms for historic resources shall be produced and submitted to the California Historical Resources Information System (CHRIS) to document current conditions of any historical resource prior to removal of any rows of the vineyard from the historic era.

24) The Project shall rehabilitate any sections of existing rail for the adjacent train track that has fallen into disrepair on the Project site and applicable California State Department of Parks and Recreation forms for historic resources shall be produced and submitted to the California Historical Resources Information System (CHRIS) to document the condition of the existing rail for the train resource before any Project construction begins.

25) Applicant shall send letters of information about the Project to local historical societies that may have an interest in the history of the Project property, as appropriate.

26) Prior to issuance of a grading permit, a qualified archeologist shall prepare an Archaeological Treatment, Testing, and Curation Plan to assess of the potential presence of archaeological, paleontological and tribal cultural resources, including a site survey and a records search of the California Historical Resources Information System at the Northwest Information Center (NWIC). If warranted by the results of the assessment, the qualified archeologist shall then prepare a Cultural Resources Monitoring Plan (CRMP) in consultation with a Tribal Representative that will include protocols, as appropriate, for Workers Environmental Awareness training, on site cultural resources monitoring, Tribal monitoring, and procedures for treatment of additional cultural resources identified during ground disturbing activities associated with the Project. The CRMP shall include, at minimum, a plan the following items to be implemented before ground-disturbing or construction activities can resume for any resources found to be historical resources:

- a. A determination of the approximate volumetric quantity of archaeological deposit disturbed by all construction related earthmoving activities including grading, foundations, utility trenching and excavation for pools;
- b. Provisions for recovery of a minimum of ten percent (10%) sample of the intact cultural deposit within the area of the archaeological site impacted by the proposed Project. The actual quantity of the three percent sample of the cultural deposit shall be determined based upon the engineering data regarding volumetric quantity to native soils. Location of the mitigation excavation units shall be determined by an archeologist based upon final construction plans as well as consultation with the Project representatives;
- c. Monitoring of grading and excavations by a qualified archeologist;
- d. Provision for recovery for any significant cultural materials unearthed during construction excavation;
- e. Preparation of a final archaeological report at the completion of construction, describing all significant findings and submittal to the City, including whether these resources may require assessment for listing on the National Register of Historic Places;
- f. Preparation and submittal of an update to the existing site records and any applicable California State Department of Parks and Recreation forms for historic resources forms;
- g. Consultation with the local tribes (the Mishewal-Wappo Tribe and other tribes as appropriate based on consultation with the Native American Heritage Commission) regarding this Project.

27) If human remains are discovered, all work within 100 feet of the remains shall immediately cease, and the Napa County Coroner's office shall be notified. If the coroner determines that the remains are Native American, the coroner shall notify the Native American Heritage Commission (NAHC) to identify the most likely descendant. The Project Applicant, under the direction of the City, and in consideration of recommendations from the most likely descendant, shall prepare a plan for treatment and reinterment of the remains. In the event that the most likely descendant cannot reach an agreement with the property owner for these activities even after mediation by the NAHC, the Applicant shall reinter the remains where they will not be subject to further disturbance, record the location with the NAHC and the Northeast Information Center, and work with the City to establish a zoning designation or easement at the location to protect the remains against future discovery or damage. Per the

conditions in the CRMP, work shall halt within the vicinity of the find until the appropriate treatment measures have been completed.

28) Should any paleontological resources be encountered during ground disturbing activities, all such activities shall halt within a 100-foot radius of the discovery, a qualified paleontologist shall be contacted to determine the nature of the find, evaluate its significance, and if necessary, implement preservation or removal methods.

3. Conclusions of Historic Resources Peer Review Report

A peer review of the Environmental Assessment Report's (EAR) analysis of historical resources and the associated Environmental Design Features (EDFs) in the St. Helena Agritourism Initiative was performed by Evans & De Shazo, Inc. and is included as [Appendix E-3](#). The following is a summary of the conclusions of the peer review analysis:

- **Designations on the National Register of Historic Places (NRHP) and California Register of Historical Resources (CRHR):** The 1874 Winery Building (Redwood Cellar) and the 1881 Stable Building (also known as the Oak House or Carriage House) within the Charles Krug Winery Property are listed on the NRHP and the CRHR for association with Charles Krug; however, the other current built environment resources have not been documented or evaluated for listing on the NRHP or the CRHR. *The peer review suggests that the Property may also be eligible for its association with the Mondavi family. The peer review further suggests that the Napa Valley Railroad/Southern Pacific Railroad section within the Property may be eligible for its association with the Charles Krug Winery or the Mondavi Family as part of a potential district.*
- **Historic Vineyards:** The EAR states the "vineyard has been surveyed and documented." The peer reviewers examined the provided documentation and could not find that the term "historic vineyards" or any existing or previously existing vineyards within the Property had been surveyed or documented as part of a survey by a qualified architectural historian. Neither the National Register documentation nor any other documentation of the Property provides any evidence that an architectural historian recently surveyed the built environment resources within the Property. For this reason, impacts as a result of the Agritourism Initiative cannot be assessed based on the current documentation within the EAR. The possible demolition of "historic vineyards" or a reduction of the vineyard within the Property could significantly impact its integrity, including its feeling, setting, and association. *As such, the peer reviewers recommend that an Historic Resource Evaluation (HRE) of the Charles Krug Winery Property be completed prior to construction.*
- **Winery Viewshed:** It appears that the term "viewshed" within the EAR refers to the setting of the Property, which is the larger area or environment in which the National Register-listed Charles Krug Winery Property is located. Changes to the setting of the Property, including changes to roads, setbacks, fencing, and views, and the introduction of new buildings can significantly affect the integrity of the historic property/historical resource. *This concern reinforces the peer reviewers' recommendation that a Historic Resource Evaluation (HRE) of the Charles Krug Winery Property should be completed prior to construction.*
- **Completion of a Standards Review:** In addition, the peer reviewers recommend that a qualified architectural historian complete a Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards) review to provide guidance to all stakeholders prior to the beginning of any work within the National Register-listed Property.

4. Conclusions of Archaeological Resources Peer Review Report

A peer review of the Environmental Assessment Report's (EAR) analysis of archaeological, paleontological and tribal cultural resources and the associated Environmental Design Features (EDFs) in the St. Helena Agritourism Initiative was performed by Evans & De Shazo, Inc. The report is not included in the appendices due to its confidential nature. The following is a summary of the conclusions of the peer review analysis:

- **Assessing the Potential Presence of Archaeological, Paleontological and Tribal Cultural Resources:** The peer review analysis found that EDF 26 does not follow State law standards that would apply if this project were subject to CEQA and, as written, is not sufficient to reduce Project-related impacts on archaeological resources or Tribal cultural resources to a less-than-significant level. Specifically:
 - The "Archaeological Treatment, Testing, and Curation Plan" called for by EDF 26 is not the appropriate type of document to "assess the potential presence of archaeological, paleontological and Tribal cultural resources." The appropriate type of document would be an inventory/identification report.
 - Tribal cultural resources can only be identified through consultation with a California Native American Tribe(s), and paleontological resources need to be identified by a paleontologist who meets the Society of Vertebrate Paleontology (SVR) qualification standards; neither of which appears to have happened as part of the proponent's environmental assessment.
 - EDF 26 does not provide for evaluative testing of the known archaeological resources or those discovered during construction, which is a State law standard for archaeological resources that could be impacted by a project.
 - EDF 26 does not provide specific measures to mitigate or avoid significant adverse impacts to known archaeological resources or newly identified archaeological resources, as warranted based on evaluative testing.
- **Discovery of Human Remains:** The peer review report found that EDF 27 follows State law standards pertaining to the discovery of human remains.
- **Paleontological Resources:** The peer review report found that EDF 28 follows State law standards pertaining to the discovery of paleontological resources in terms of the language used; however, it does not appear that the standard procedures for paleontological resource impact assessment and mitigation were followed or prepared by a paleontologist who meets the SVR qualification standards.
- **Preparation of a Cultural Resources Monitoring Plan (CRMP):** The CRMP outlined in EDF 26 should be prepared because the property contains a Native American resource and is a State Historical Landmark and listed on the National Register of Historic Places (NRHP). The CRMP should include a specific provision for evaluative testing of any archaeological resources discovered during construction that cannot be avoided and preserved in place.

F. Energy

1. Summary of Energy Findings in the Environmental Assessment Report

The following summary is an excerpt from the Environmental Assessment Report (EAR) prepared by the proponents of the St. Helena Agritourism Initiative:

Construction under the Agritourism Initiative would result in energy expenditures from diesel and gasoline utilized to fuel off-road construction equipment and construction vehicles traveling to and from the project site. Off-road construction equipment associated with the proposed project would consume an estimated 49,188 gallons of diesel. Vehicles used by workers, vendors, and haul trucks would consume an estimated 21,763 gallons of diesel and gasoline combined. The proposed project would consume an estimated 999,773 kilowatt-hour per year (kWh/yr) of electricity and 3,599,946 Million Metric British Thermal Units per year (MMBTU/yr) of natural gas from the proposed hotel and associated uses. Mobile source energy consumption for vehicle trips to the site are an estimated 71,302 gallons per year (gal/year) of fossil fuel combined and 31,044 kWh of electricity for electric vehicles. The Agritourism Initiative includes two EDFs which are specifically intended to reduce energy consumption and increase energy efficiency.

2. Proposed Environmental Design Features (EDFs) from St. Helena Agritourism Initiative

29) Prior to issuance of a final occupancy permit, the Applicant shall demonstrate the Project's compliance with the following measures to the City Planning Division:

- a. Parking lot lights mounted and arranged efficiently to minimize energy compared to a greater number of fixtures at lower heights without increasing impacts on adjacent properties. The use of LED lamps to provide a higher level of perceived brightness with less energy than other lamps;
- b. The implementation of reflective cool roof material (SRI of 16 or greater);
- c. High efficiency HVAC units with high-efficiency ducted systems;
- d. Photo sensor and time clock-controlled parking lot and exterior lights.
- e. The use of high-efficiency light source and ballasts (LED) and bilevel switching for fluorescent fixtures are used;
- f. Energy efficient Transformers;
- g. The use of variable speed motors make-up air units, booster pumps and air side and/or water side economizers;
- h. All electric utility service meters shall be a smart meter or equivalent advanced metering device, if allowed by the utility provider;
- i. All toilets, urinals, sinks, showers and other water fixtures installed on-site shall be as required by California's Green Building Code, as may be amended from time to time.

30) The Applicant shall implement the following emissions reduction measures:

- a. Utilize energy-efficient appliances, such as Energy Star-certified (or equivalent) water heaters, to reduce energy consumption and emissions;
- b. Utilize automated controls for air conditioners and lighting to reduce electricity consumption and associated emissions.

3. Analysis of Energy Impacts Associated with the Agritourism Initiative

A peer review analysis of the Energy Impacts associated with the Initiative was not prepared for this 9212 Report.

G. Geology & Hydrogeology

1. Summary of Geology & Hydrogeology Findings in the Environmental Assessment Report

The following summary is an excerpt from the Environmental Assessment Report (EAR) prepared by the proponents of the St. Helena Agritourism Initiative:

The project site is partially within Zone AE (within the 100-year flood area) of the Federal Emergency Management Association (FEMA) floodplain mapping. Stormwater management for the site would be provided in accordance with the Bay Area Stormwater Management Agencies Association (BASMAA) requirements. A minimum of 4 percent of the site's impervious areas would be required as bioretention facilities. These engineered landscape interventions accept stormwater runoff and percolate water through their soil, removing contaminants and allowing runoff to return to the water table. The Agritourism Initiative includes 14 EDFs which address flood risks and protecting the project and public from such risks.

2. Proposed Environmental Design Features (EDFs) from St. Helena Agritourism Initiative

32) No new structures or fill that results in any increase in flood levels during the occurrence of the base flood discharge shall be developed within the Federal Emergency Management Association (FEMA) Floodway.

33) In accordance with the City of St Helena Municipal Code Section 15.52.150, the Project shall accommodate a Design Flood Elevation (DFE) of 18 inches above the Base Flood Elevation (BFE).

34) Any building structure below the Design Flood Elevation (DFE) shall be watertight with walls substantially impermeable to the passage of water, having structural components capable of resisting hydrostatic and hydrodynamic loads and the effects of buoyancy, and be certified by a registered civil engineer.

35) The Applicant shall comply with site-specific recommendations set forth in site-specific engineering geology and soils investigation/geotechnical reports. The geology and geotechnical reports shall include site-specific studies and analyses for potential geologic and/or geotechnical hazards at the site. Geotechnical reports shall address the design of pilings, foundations, walls below grade, retaining walls, shoring, subgrade preparation for floor slab support, paving, earthwork methodologies, and dewatering, where applicable. Geology and geotechnical reports may be prepared separately or together and signed and stamped by a Professional Geologist or Professional Engineer licensed in the State of California.

36) During Project construction earthwork and grading activities, geotechnical observation shall be performed by the Project geotechnical engineer.

37) The grading plans provided by the Applicant for review shall include the existing topography shown with contour lines labeled at one-foot intervals and extending a minimum of 100-feet beyond the limits of the site, or sufficient distance to indicate impacts on adjacent properties.

38) The Applicant shall construct all on and offsite improvements in accordance with the improvement plans and supporting calculations that are prepared by a registered civil engineer and reviewed by the City of St. Helena Public Works Department. The improvement plans and supporting calculations shall include detailed designs for all utilities, water, grading, drainage, erosion control and paving.

3. Analysis of Geology & Hydrogeology Impacts Associated with the Agritourism Initiative

A peer review analysis of the Geology & Hydrogeology Impacts associated with the Initiative was not prepared for this 9212 Report, however the following information was included in the groundwater peer review prepared by Coastland I DCCM:

- **Development of the FEMA Floodplain:** The EAR acknowledges that a small wedge of land at the northern corner of the resort site falls within a Regulatory Floodway as shown on the FEMA Flood insurance Rate Map (FIRM) and goes on to state that Project development will remain outside of the floodway. *However, the peer review indicates that two new access driveways north of the Project site will cross through the Floodway.*

H. Greenhouse Gas Emissions

1. Summary of Greenhouse Gas Emissions Findings in the Environmental Assessment Report

The following summary is an excerpt from the Environmental Assessment Report (EAR) prepared by the proponents of the St. Helena Agritourism Initiative:

The proposed project would generate approximately 699 metric tons of carbon dioxide equivalents (MT CO₂e) during construction. During operations, the proposed project would generate approximately 1,693.3 MT CO₂e per year after the inclusion of 23.3 MT CO₂e per year from project construction. There are no quantified thresholds used to judge the significance of these emissions. In an effort to reduce GHG emissions, the proposed project has been designed to be all electric and energy efficient. The assessment finds that the Vehicle Miles Traveled (VMT) in the region would unlikely change as a result of the proposed project.

The Agritourism Initiative includes two EDFs related to air quality and two EDFs related to energy which would indirectly reduce the effects of GHGs. Note that most emissions are the result of traffic, followed by energy use. (Appendix B, p. 4)

2. Proposed Environmental Design Features (EDFs) from St. Helena Agritourism Initiative

30) The Applicant shall implement the following emissions reduction measures:

- a. Utilize energy-efficient appliances, such as Energy Star-certified (or equivalent) water heaters, to reduce energy consumption and emissions;
- b. Utilize automated controls for air conditioners and lighting to reduce electricity consumption and associated emissions.

Note: Implementation of the Transportation-related EDFs in the Initiative (See Transportation section, below) would contribute to reduced GHG emissions.

3. Conclusions of Greenhouse Gas Emissions Peer Review Report

A peer review of the Environmental Assessment Report's (EAR) analysis of greenhouse gas emissions and the associated Environmental Design Features (EDFs) in the St. Helena Agritourism Initiative was performed by Illingworth & Rodkin, Inc. and is included as [Appendix E-1](#). The following is a summary of the conclusions of the peer review analysis:

- **Methodology:** The prediction of GHG emissions was based on CalEEMod modeling. The EAR uses the latest project GHG thresholds recommended in the 2022 Bay Area Air Quality Management District's (BAAQMD) CEQA Air Quality Guidelines, which are qualitative in general.
- **All Electric Design:** To meet BAAQMD thresholds, the project must not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development). As discussed above (see Air Quality), the CalEEMod modeling indicates natural gas usage.
- **Vehicle Miles Traveled (VMT) Impact:** BAAQMD thresholds require that a project will achieve a reduction in project-generated vehicle miles traveled (VMT) below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted Senate Bill 743 VMT target that reflects the recommendations provided in the Governor's Office of Planning and Research's Technical Advisory. Projects that are exempt from the VMT analysis generally meet this requirement. *It appears that no such VMT analysis has been conducted to demonstrate that the VMT requirement is exempt or is below the BAAQMD/SB 743 target. Furthermore, the proponent's traffic analysis does not address the City of St. Helena's recently-adopted VMT thresholds.*
- **Electric Vehicle (EV) Parking:** The BAAQMD GHG thresholds require that projects achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2. The Environmental Assessment states that the proposed project is only required to comply with CALGreen's mandatory level of EV charging infrastructure. Therefore, the proposed project would not be consistent with this element. *During the building permit phase, the City will impose appropriate EV charging requirements upon the Project that are consistent with CALGreen Tier 2.*
- **Transportation:** Please note that there is additional discussion of transportation issues that relate to GHG emissions, including analysis of Vehicle Miles Traveled (VMT), in the Transportation section below.

I. Hazards & Hazardous Materials

1. Summary of Hazards & Hazardous Materials Findings in the Environmental Assessment Report

The following summary is an excerpt from the Environmental Assessment Report (EAR) prepared by the proponents of the St. Helena Agritourism Initiative:

The project site's history has been primarily agricultural in the form of vineyards cultivated intermittently throughout the project site's history. There are currently no known Recognized Environmental Conditions (RECs), Controlled Recognized Environmental Conditions (CRECs), or Historical Recognized Environmental Conditions (HRECs) in relation to the project site. Development under the Agritourism Initiative would be subject to applicable plans, policies, and regulations pertaining to the use, handling, storage, and disposal of hazards and hazardous materials. Furthermore, the Agritourism Initiative includes nine EDFs which are specifically intended to test for and remediate any possible contaminated soils.

2. Proposed Environmental Design Features (EDFs) from St. Helena Agritourism Initiative

39) Prior to issuance of grading permits, shallow soils samples shall be taken on-site to determine the location of any contaminated soils on the site with concentrations above generally established applicable worker safety thresholds.

40) Any soils with residual agricultural chemicals exceeding the generally applicable screening levels for commercial uses, or hazardous waste limits shall be characterized, removed, and disposed of off-site at a licensed hazardous materials disposal site.

41) All hazardous materials measures shall be printed on all construction documents, contracts, and Project plans prior to issuance of grading permits.

42) If contaminated soils are found in concentrations above established thresholds, a Site Management Plan (SMP) shall be prepared and implemented by the Applicant (as outlined below) and any contaminated soils found in concentrations above established thresholds shall be removed and disposed of according to applicable requirements and regulations. The SMP shall be prepared by a qualified hazardous materials consultant and provided to the City with grading permit applications. The SMP shall include:

- a. Management practices for handling contaminated soil or other materials if encountered during construction or cleanup activities and measures to minimize dust generation, stormwater runoff, and tracking of soil off-site;
- b. Preliminary Remediation Goals (PRGs) for environmental contaminants of concern to evaluate the site conditions following SMP implementation;
- c. A Health and Safety Plan (HSP) for each contractor working at the site that addresses the safety and health hazards of each phase of site operations that includes the requirements and procedures for employee protection. The HSP will also outline proper soil handling procedures and health and safety requirements to minimize worker and public exposure to hazardous materials during construction.

43) Cleanup and remediation activities on the site prior to building construction shall be conducted in accordance with the SMP.

44) All measures shall be printed on all construction documents, contracts, and Project plans prior to issuance of grading permits.

45) Project construction activities shall comply with all generally applicable federal Occupational Safety and Health Administration Safety (OSHA) and California General Industry Safety Orders and Health Standards.

46) Hazardous materials, if any, associated with Project construction shall be located and stored in compliance with applicable federal, state, and local requirements. Response procedures for spills and leaks of hazardous materials, if any, shall be established in compliance with applicable federal, state, and local requirements.

3. Analysis of Hazards & Hazardous Materials Impacts Associated with the Agritourism Initiative

A peer review analysis of the Hazards & Hazardous Materials Impacts associated with the Initiative was not prepared for this 9212 Report.

J. Noise

1. Summary of Noise Findings in the Environmental Assessment Report

The following summary is an excerpt from the Environmental Assessment Report (EAR) prepared by the proponents of the St. Helena Agritourism Initiative:

The loudest phase of construction is typically the site preparation and grading phase, as that is when the loudest pieces of heavy construction equipment would operate. The nearest noise-sensitive receptor to the construction footprint of the proposed project would be the single-family residential homes located approximately 750 feet west of the project site, across SR-29. Reasonable worst-case interior noise levels, from construction activities, measured in A-weighted decibels (dBA), would range up to 36 dBA maximum noise level (L_{max}) and 26 dBA equivalent noise level (L_{eq}).

During operations, mechanical ventilation systems could be located as close as 770 feet from the nearest off-site residential receptor. At this distance, noise generated by multiple mechanical ventilation units operating simultaneously would attenuate to less than 24 dBA L_{eq} at the nearest residential receptor. Parking lot areas would be located approximately 1,470 feet from the nearest off-site residential receptor. At this distance, noise generated by parking lot activity would attenuate to less than 15 dBA L_{eq} at the nearest residential receptor.

The traffic volumes generated by the proposed project would not result in even a 3 dBA increase in traffic noise levels and would be considered a “less than perceptible” increase. (Appendix B, p. 3-4)

2. Proposed Environmental Design Features (EDFs) from St. Helena Agritourism Initiative

47) Project construction contractors shall be required to provide a Noise Management Plan to reduce construction noise at any offsite residences to the extent feasible, and shall implement the Noise Management Plan for construction activities.

48) The noise management plan shall include the following requirements:

- a. Outdoor parking lot sweeping activities associated with the Project generally shall be limited to the daytime hours between 7:00 a.m. and 10:00 p.m.;
- b. Construction activity, including all outdoor loading, unloading, opening, closing or other handling of boxes, crates, containers, building materials, or similar objects in such a manner as to cause a noise disturbance to residential uses shall be limited to the daytime hours between 7:00 a.m. and 10:00 p.m.;
- c. Noise-generating equipment operated at the Property shall be equipped with noise control devices to the extent reasonably available (i.e., mufflers, intake silencers, lagging, and/or engine enclosures). All equipment shall be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated. Pile drivers used within 1,500 feet of offsite residences shall be equipped with noise control measures to reduce sound energy emissions associated with pile driving (e.g., use of noise attenuation shields or shrouds). Holes for piles will be pre-drilled to the extent feasible;
- d. Haul routes shall avoid noise-sensitive land uses to the extent feasible;
- e. Staging areas and construction material storage areas shall be located away from adjacent residences.

3. Conclusions of Noise Peer Review Report

A peer review of the Environmental Assessment Report's (EAR) analysis of noise and the associated Environmental Design Features (EDFs) in the St. Helena Agritourism Initiative was performed by Illingworth & Rodkin, Inc. and is included as [Appendix E-5](#). The following is a summary of the conclusions of the peer review analysis:

- **Methodology:** It appears that calculations are made using the Federal Highway Roadway Construction Noise Model (RCNM). If that is the case, it should be clearly stated.
- **General Comments:** Throughout the Noise section, many noise levels are cited without any references. Proper references should be cited.
- **Construction Noise:** In the example on page 71, it appears that the five multiple pieces of equipment were one of each type yielding the L_{eq} value of 51 dB overall. It might be helpful to cite these as a range: five graders would produce 53 dBA, while five front end loaders or backhoes would produce 46 dBA. *However, this would not affect the conclusion.*
- **Interior Noises:** In regard to interior noise for the residences on the southwest side of the project area, it could be noted that State Route 29 (SR 29) lies in between the project site and the residences. A simple calculation of the daytime roadway traffic noise levels could help to reinforce that the construction noise is not expected to be an issue in the interior of these dwellings.
- **Operational/Stationary Source Noise Impacts:** It appears that the stated expected interior noise due to mechanical equipment is based approximately on an average of the 45 to 60 dBA source

levels. Based on our experience, assuming a 25 dB exterior to interior noise reduction is typical. With that amount of noise reduction, the interior levels would be expected to range from about 15 dBA to 30 dBA. If this were compared to SR 29 traffic noise levels, the conclusion of the mechanical equipment being “less than perceptible” may be further supported.

K. Public Services (Schools, Police, Fire, Open Space/Parks)

1. Summary of Public Services Findings in the Environmental Assessment Report

The following summary is an excerpt from the Environmental Assessment Report (EAR) prepared by the proponents of the St. Helena Agritourism Initiative:

The operations of the proposed project would likely necessitate additional public services such as police, fire protection, and emergency medical response. However, all required fees, including planning fees, development impact fees, building fees, and St. Helena Unified School District (SHUSD) fees for the proposed project are required to be paid prior to issuance of a building permit. Furthermore, the Agritourism Initiative includes nine EDFs to ensure compliance with Fire Code and Fire Department requirements and three EDFs related to landscaping and creating a bicycle- and pedestrian-friendly environment.

2. Proposed Environmental Design Features (EDFs) from St. Helena Agritourism Initiative

50) Project water lines and hydrants shall be sized and located so as to meet the fire flow requirements established by the Fire Department.
51) Prior to construction, building plans shall be submitted to the Fire Department for review. Based on such review, any additional fire safety requirements shall be implemented to the satisfaction of the Fire Department.
52) During construction, adequate ingress/egress access points shall be provided for emergency response in compliance with the requirements of the Fire Department.
53) Clearly marked, durable, source sorted recycling bins shall be conveniently located within the Property unless the Property is under contract with a vendor to sort waste.
54) The Applicant or its designee shall be responsible for meeting with the Building Official, Fire Inspector and/or Public Works Department to review compliance with Building Codes, Fire Codes, and applicable Public Works Standards.
55) No construction may commence until adequate access to fire water supply is available to building sites as approved by the Fire Chief.
56) Prior to issuance of a certificate of occupancy, trash areas, dumpsters and recycling containers shall be enclosed and roofed per applicable standards to prevent water run-on to the trash area and water

runoff from the area, to contain litter and trash so that it is not dispersed by the wind or run-off during waste removal. In the event that wine or food is disposed in these areas, the enclosed trash area shall drain to the sanitary sewer system or alternative treatment system. An area drain connected to the sanitary sewer or alternative treatment system shall be installed in the enclosure area and a structural control such as an oil/water separator or sand filter shall be included. No other area shall drain into the trash enclosure. A sign shall be posted prohibiting the dumping of hazardous materials into the sanitary sewer.

57) Prior to Certificate of Occupancy, the Applicant shall repair all public improvements that are damaged by the construction process in accordance with the City's generally applicable Water/Sewer/Street/Storm Drain/Sidewalk Standards, as may be amended from time to time.

58) Plans submitted for building permit shall exhibit compliance with the then current St. Helena Fire Code, as required by St. Helena Municipal Code Chapter 15.36, as may be amended from time to time.

59) Fire sprinklers and fire hydrants shall be installed as required by Fire Code and the Fire Department.

60) One hour minimum fire-resistant construction on all exterior walls within 10' of property boundary is required. Fire resistant construction of interior walls shall be determined by type of occupancy.

3. Analysis of Public Services Impacts Associated with the Agritourism Initiative

A peer review analysis of the Public Services Impacts associated with the Initiative was not prepared for this 9212 Report.

L. Transportation

1. Summary of Transportation Findings in the Environmental Assessment Report

A Transportation Impact Study for the St. Helena Resort Project was prepared for the proponents of the Initiative by W-Trans (March 2024) and is included as Appendix I to the Initiative. The following summary is an excerpt from the Environmental Assessment Report (EAR) prepared by the proponents of the St. Helena Agritourism Initiative based on the W-Trans Transportation Impact Study:

The proposed project is expected to generate an average of 576 trips per weekday, including 55 trips during the AM peak-hour and 78 trips during the PM peak-hour. The Agritourism Initiative would require the proposed project to complete roadway improvements and sidewalk replacements. Pursuant to the EDFs, development under the Agritourism Initiative would be required to improve site access and provide traffic directional signs in accordance with City and California Department of Transportation (Caltrans) standards, and would be required to construct a minimum 8-foot-wide paved bicycle and pedestrian trail, which would be open to the public, along the railway and within the property rights of the railway operator, between the project site and Fulton Lane. The EDFs would also require payment into the proposed signal fund for SR-29 and Deer Park Road; the Silverado Trail and Deer Park signal lane realignment; and all City traffic

impact fees. Additionally, the existing railroad would be rehabilitated. Furthermore, the Agritourism Initiative includes 16 EDFs that address transportation impacts. (Appendix B, p. 5)

2. Proposed Environmental Design Features (EDFs) from St. Helena Agritourism Initiative

61) To encourage the use of alternative modes of transportation, the Applicant shall provide employee bicycle racks for no less than six bicycles.

62) To encourage the use of alternative fueled transportation, the Applicant shall install electric vehicle recharging stations at the Project site as required by St. Helena Municipal Code Section 17.26.090, as may be amended from time to time.

63) Preferential parking spaces shall be provided for low emission vehicles, including alternative-fuel vehicles, hybrid vehicles that qualify for freeway carpool lanes, and van pools.

64) During construction, a Construction Traffic Management Plan (CTMP) shall be prepared and implemented so as to reduce traffic impacts to adjacent residential neighborhoods, or pedestrian and vehicular impediment or interference due to construction traffic. The CTMP shall be attached to all construction contracts and shall include:

- a. procedures for roadway closures or traffic detours;
- b. haul routes;
- c. required protective devices and warning signs;
- d. locations of construction worker parking lots;
- e. construction vehicle staging shall be configured to reduce traffic interference and the need for lane closures.

65) At the Applicant's expense, the southbound approach at Deer Park Road and entrance to the Project shall be improved to include a left-turn lane and a through lane, within the existing right-of-way.

66) A Transportation Demand Management program shall be prepared and implemented by the Applicant to encourage Project employees and patrons to reduce vehicular traffic on the street and freeway system during the most congested time periods of the day and to further reduce Vehicle Miles Traveled (VMT) and to support the City's trip reduction and climate policies. The Transportation Demand Management program may include but not be

limited to the following:

- a. Bicycle and pedestrian-friendly environment (i.e., established and clear pedestrian networks, intersections, and built environments);
- b. Bicycle amenities, including bicycle parking (4 long-term spaces and 6 short term spaces minimum);

- c. Rideshare/carpool/vanpool promotion and support;
- d. Education and information on alternative transportation modes, including railway as available, via the Resort operator website;
- e. Discounted employee transit passes; Designate a Transportation Demand Management (TDM) coordinator to establish programs to ensure VMT by guests and employees are reduced, including, but not limited to, employee car and vanpooling, employer-sponsored transit passes, bicycle sharing, showers, lockers, secure bike storage, and winery tours for guests with pickup and drop-off at the lodge.

67) Prior to issuance of a Certificate of Occupancy, the Applicant shall provide no fewer than 25 courtesy bicycles for guests.

68) To preserve existing sight lines, any new signage, monuments, or other structures to be placed near the Project entrance shall be positioned outside of the vision triangles of a driver waiting on the Project access drive.

69) To minimize left turns onto SR 29 from Deer Park Road, Project signage shall be installed on the driveway directing drivers to use SR 29 to go north and Silverado Trail to go south.

70) In the event the City of St. Helena installs a traffic signal at SR 29/Deer Park Road, the Project Applicant shall pay its proportional share of the cost of the signal at the time the signal is constructed by the City.

71) In the event the County of Napa converts the existing traffic signal at Silverado Trail/Deer Park Road from flashing red operation to normal signal operation and changing the geometry on the westbound approach to a left turn and through/right-turn lanes, the Applicant shall deposit funds with the County to cover the cost of the striping improvements to allow the County to implement this change at such time as it becomes necessary.

72) The Project shall cooperate, including by way of agreements, with the adjacent winery operator to ensure there is an adequate parking supply.

73) Prior to issuance of a Certificate of Occupancy, the Applicant shall pay traffic impact fees based on the City's Master Fee Schedule, and the fee will assume all square footage calculated at the lodging rate.

74) Prior to issuance of a building permit, the Applicant shall be required to obtain a City or other applicable encroachment permit for improvements on any public right-of-way.

75) Prior to occupancy, Applicant shall construct, to the extent not previously constructed, a minimum 8-foot wide paved bicycle and pedestrian trail, which shall be open to the public, along the railway and within the property rights of the railway operator, between the Project site and Fulton Lane, provided that such obligation to construct is subject to issuance of any required permits, with reasonable and feasible conditions, from any federal and/or state agency with jurisdiction over construction affecting jurisdictional waters.

3. Conclusions of Transportation Impact Study Peer Review Report

A peer review of the proponent's Transportation Impact Study, the Environmental Assessment Report's (EAR) analysis of transportation, and the associated Environmental Design Features (EDFs) in the St. Helena Agritourism Initiative was performed by Kittleson & Associates and is included as [Appendix E-6](#) to this 9212 Report. The following is a summary of the conclusions of the peer review analysis:

- **Traffic Study Methodology:** The EAR notes that traffic counts were collected on Friday, January 26th and Saturday, January 27th between 4 and 6 PM. Typically, traffic counts are collected for a midweek day between 4-6 PM and on weekends sometime during the midday period. The text provides no documentation for why a Friday was collected between 4-6 PM rather than a typical midweek day or why Saturday 4-6 PM was collected rather than midday. *The peer review suggests that additional documentation be provided explaining these decisions, and why the results represent peak conditions in St. Helena as compared to more typical data collection protocols.*
- **Collision History at SR 29/Deer Park Road:** The peer review suggests that this section makes a number of unsupported claims and assumptions, including that there is a "lack of similarity between the collisions" and that the incidence rate is "within normal safety parameters." *The peer review suggests that the section be rewritten to focus on the known facts and whether there are enough collisions to trigger the safety warrant. If not, simply state that the number of collisions is not sufficient to meet safety warrants for the installation of a traffic signal per the California Manual on Uniform Traffic Control Devices (MUTCD).*
- **Trip Generation:** The peer review indicates that insufficient evidence is provided to support the assumption that 25% of restaurant patrons will come from the hotel.
- **Trip Distribution:** The peer review indicates that insufficient evidence is provided to support the assumption that most visitors will drive via Silverado Trail instead of SR 29.
- **Vehicle Miles Traveled (VMT):** The peer reviewer disagrees with the method used to screen out the Hotel and Restaurant Customer VMT. The point of the retail screenings is that retail less than 50,000 square feet is normally serving locals in the vicinity of the project. Hotel guests by definition are non-locals. *The peer review suggests removing the section on Hotel and Restaurant customer VMT and only including the calculations for employee VMT.*
- **Additional Signal Warrant Analysis:** LOS for two-way stop-controlled intersections is traditionally reported for the worst approach. Since the westbound approach is failing today and the project makes it worse, the City of St. Helena's criteria for looking at whether signalization is warranted should be performed. *The peer review suggests that a peak hour signal warrant analysis be conducted both with and without the project under existing and future conditions to determine whether the signal warrants are met.*
- **Parking:** The peer review notes that the proponent should submit a copy of the project's parking agreement with Charles Krug Winery to provide up to 50 off-site parking spaces.

M. Utilities (Water, Groundwater and Wastewater)

1. Summary of Utilities Findings in the Environmental Assessment Report

A Civil Engineering Report for the St. Helena Resort Project was prepared for the proponents of the Initiative by Sherwood Design Engineers (May 2024) and is included as Appendix F to the Initiative. The following summary is an excerpt from the Environmental Assessment Report (EAR) prepared by the proponents of the St. Helena Agritourism Initiative based on the Civil Engineering Report:

The Agritourism Initiative minimizes impacts on the City's infrastructure because the development does not contemplate or require the extension of municipal urban services such as sewer and water, provided that wastewater treatment is provided by an on-property package water reclamation system sized for project-serving flows in the form of a membrane bioreactor or similar system that is capable of providing tertiary-level water quality treatment and there is adequate water from existing on-site wells to provide potable water; emergency systems water and irrigation water would be supplied by recycled water and supplemented by on-site wells as needed. However, if the City and the project Applicant decide to connect the proposed project to the system, then all applicable connections and fees would be required. In addition, the Applicant would be required to pay all development impact and building fees and design to all applicable City Standards. There are 15 EDFs specific to infrastructure that address development under the Agritourism Initiative's responsibility for fees, costs, repairs and not impacting City infrastructure. (Appendix B, p. 5)

With regard to groundwater extraction, the Civil Engineering Report, upon which the EAR is based, provides the following information:

Section 3.0 states, in part:

The Project is located in a California Statewide Groundwater Elevation Monitoring (CASGEM) High Priority Basin which requires a local Groundwater Sustainability Agency (GSA). Napa County's Groundwater Management Ordinance (GMO) implements these GSA requirements, which generally cover approval of water supply systems, wells, and conservation. In accordance with the GMO, the Project will be a steward of local water resources by demonstrating a water use scheme with no net impact on the aquifer.

Section 3.2 states, in part:

The Project is located in the Napa Valley Floor groundwater area which is allocated 0.3 acre-foot per acre per year of new groundwater withdrawals. One acre-foot is equivalent to 325,851 gallons. Because the Noble House Hotel will repurpose previously permitted groundwater extraction, the 140-acre parcel will demonstrate a net water usage not exceeding 13.7 MG (37,500 GPD) for no net increase in groundwater use.

2. Proposed Environmental Design Features (EDFs) from St. Helena Agritourism Initiative

76) Prior to the issuance of a Certificate of Occupancy, the Applicant shall underground on-site utility lines per the applicable requirements of the St. Helena Municipal Code. The cost of undergrounding shall be the responsibility of the Applicant. Due to the economic and engineering infeasibility of undergrounding any regional serving overhead power lines, any such existing lines may remain on overhead power poles.

77) Any new and modified existing water laterals, meters and backflow prevention devices shall be constructed in accordance with the generally applicable requirements of the City of St. Helena. Any new laterals shall be located perpendicular to the water main.

78) A Notice of Intent (NOI) shall be filed with the Regional Water Quality Control Board to comply with the statewide General Permit for Discharges of Storm Water Associated with Construction Activities (General Permit) and a Storm Water Pollution Prevention Plan (SWPPP) shall be prepared and implemented for construction activities on the Property in accordance with applicable State requirements.

79) Potable water will be provided by existing on-site wells. Emergency systems water and irrigation water will be supplied by recycled water and supplemented by on site wells as needed. Alternatively, such water may be provided by municipal water systems if permitted by the City. The use of existing water wells within the City, including the maintenance, modification, or reconstruction thereof, for potable water, emergency systems water and irrigation water not supplied through recycled water shall be allowed and not require a permit under St. Helena Municipal Code Section 13.16.060.

80) Prior to the issuance of a building permit, Applicant shall have a qualified hydrogeologist prepare a groundwater report describing how the Project's use of existing groundwater well(s) on the Winery Property will not have a material adverse impact on the water production capability of the City. The groundwater report shall demonstrate:

- a. The Project well(s) are more than 1500 feet on average from the City wells for potable water;
- b. The Project well(s) are more than 500 feet from the Napa River;
- c. The Project with existing groundwater uses on the Winery Property will not annually exceed 0.3 acre-ft of groundwater extraction from the Project well(s);
- d. Recycled water will be generated through onsite water reclamation to maximize supply of non-potable water;
- e. Project groundwater demands do not exceed the capacity of on-site well(s);
- f. Well water extracted for use in the proposed development will, after initial use, be captured, treated, and reused for non-potable demands on the Winery Property, and will contribute to groundwater recharge.

81) The Project shall incorporate best practices for water conservation, which shall include the metering the water production/extraction and well water levels.

82) Applicant shall obtain all necessary permits from local and state agencies for the nontransient community water system.

83) If the City provides a municipal water system connection and Applicant elects to connect to the municipal water system in lieu of the groundwater well(s) prior to Grading Permit, the Applicant shall execute prior to Building Permit a Water Agreement with the City, and shall comply with all applicable policies, codes, and other requirements for the municipal water system connection.

84) A grading and drainage plan shall be prepared for the Project that includes a design that allows for a 100-year overland release. All graded building pads shall be above the 100-year overland release elevation.

85) Prior to issuance of a grading or building permit (whichever occurs first) a detailed Post-Construction Stormwater Control Plan (SWCP) that identifies and sizes all permanent post-construction stormwater treatment best management practices (BMPs) shall be prepared by the Applicant's engineer and submitted for review approval by the City Engineer.

86) Prior to the issuance of a Certificate of Occupancy, a Post Construction Stormwater Operations and Maintenance Plan that provides a color-coded plan sheet showing all storm drain and water quality infrastructure that is to be maintained, along with detailed instructions and schedules for the ongoing maintenance and operation of all post-construction stormwater BMPs shall be submitted by the Applicant's engineer for review and approval by the City Engineer. Once approved, the property owner shall comply with the Post Construction Stormwater Operations Maintenance Plan BMPs.

87) If proposed/new landscaping involves an area greater than 500 square feet or rehabilitation of more than 2,500 square feet, the proposed landscaping shall comply with water efficient landscape best practices that are at least as effective as the State's Model Water Efficient Landscape Ordinance (MWELo), to the extent MWELo does not generally apply to the Project. Compliance shall be demonstrated as part of the building permit submittal.

88) Proposed separations between public water facilities and other utilities shall meet the minimum separations as specified by the generally applicable Department of Health and City of St. Helena Public Works Standards, as may be amended from time to time.

89) Wastewater treatment provided by an on-property package water reclamation system sized for WPA project serving flows in the form of a membrane bioreactor or similar system that is capable of providing tertiary treated water quality treatment shall be allowed. Alternatively, wastewater services may be provided by municipal wastewater systems if permitted by the City.

90) If the City provides a municipal wastewater system connection and Applicant elects to connect to the wastewater system in lieu of an on-property package water reclamation system prior to the issuance of a grading permit for the Project, the Applicant shall comply with all applicable policies, codes, and other requirements for the municipal wastewater system connection.

91) Prior to the issuance of building permit, Applicant shall provide a Wastewater Treatment Plant Plan and Design that contains the following information:

- a. Design of the treatment system that is compliant with applicable State and County code standards for domestic wastewater generated onsite from sinks, showers, toilet flushing, and winery process water that will be treated to high quality, tertiary standards onsite with a packaged treatment system operated by the Project.
- b. The Project shall provide a new package plant sized for both Project and the adjacent winery wastewater flows, providing tertiary level water quality treatment.
- c. The reclaimed water yielded from the treatment process shall be reused for non-potable demands within the Project, consisting of outdoor drip or spray irrigation and indoor flush fixtures.
- d. Excess treated water shall be available for the adjacent winery, which may use reclaimed water for washdown and tank cleaning or application to vineyards, and subject to all applicable State and County requirements and standards.

92) Where applicable, the Applicant shall be required to submit to the requirements for annual inspections of food/beverage service establishments and businesses that handle hazardous wastes for illicit stormwater discharges as required by the State National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges. The annual stormwater illicit discharge inspections are performed and invoiced by Napa County Department of Environmental Management.

3. Conclusions of Utilities (Water, Groundwater and Wastewater) Peer Review Reports

A peer review of the proponent's Civil Engineering Report, the Environmental Assessment Report's (EAR) analysis of utilities, and the associated Environmental Design Features (EDFs) in the St. Helena Agritourism Initiative was performed by Coastland | DCCM and is included as [Appendix E-7](#) to this 9212 Report. The following is a summary of the conclusions of the peer review analysis:

- **Increased Groundwater Usage:** While the EAR claims that there will be "no net increase in groundwater use," the report seems to misconstrue the maximum annual allowance for new groundwater withdrawals with the concept of no net increase. The existing Charles Krug Winery extraction rates total 11,921 GPD or 4.35 MGY (Table 3; process plus vineyard irrigation; domestic is supplied by a City service). The proposed increased extraction rate is 30,300 GPD or 11.06 MGY. While this is less than the 0.3 acre-foot per year allocated for new groundwater withdrawals, it is clearly an increase in groundwater use. In the event that the project is unable to utilize groundwater and applies for connection to the City's municipal water system, it would be subject to the provisions of Municipal Code Chapter 13.12, Water Use Efficiency and New Development, that are in effect at the time of application. Chapter 13.12 is commonly referred to as the City's "Water Neutrality Ordinance." *The interpretation of the County's Groundwater Management Ordinance needs to be carefully reviewed as it relates to this proposed increased groundwater use.*
- **Potential Subdivision:** The project proponents have indicated that "a subdivision is not currently planned under the structure contemplated by the landowner and resort operator. However, if the parties desire, a lot line adjustment or simple parcel map could be examined in the future." If the resort site is separated from the greater 140-acre winery site through a land division, this raises the question of whether the groundwater allocation from the remaining larger winery parcel can

be shared with the resort property. *If a subdivision is contemplated in the future, the County's Groundwater Management Ordinance needs to be carefully reviewed to ensure that a shared groundwater allocation can be accommodated.*

- **Monitoring & Enforcement:** There is no mention in the EAR of how groundwater use will be monitored or enforced. However, if a new well is developed or an existing well is expanded, it would be subject to St. Helena Municipal Code 13.16 which requires metering of the well production, monthly groundwater level monitoring and annual reporting to the City.

The following note relating to groundwater was added by WRA Environmental Consultants who conducted the Biological Resources peer review ([Appendix E-2](#)):

- **Groundwater Wells:** York Creek is located approximately 1,090 feet (0.2 mile) from the Project Area at its closest point, a setback more than sufficient to preclude both construction and operational impacts to the creek. The Project will also rely on water withdrawal from wells located within the greater winery property, but as per the EAR all such wells will be greater than 500 feet from both the Napa River and York Creek, which will avoid impacts to the hydrology and aquatic habitat of both streams. While assessing this conclusion is beyond the scope of this peer review, EDF 80 requires preparation of a groundwater report by a qualified hydrologist prior to issuance of a grading permit. *The groundwater report and analysis should address the use of on-site wells and how such may affect the hydrology of York Creek and the Napa River, providing measures to ensure that no adverse impacts to the hydrology of these streams occurs as a result of the Project.*

This section was additionally reviewed by Luhdorff & Scalmanini Consulting Engineers, a firm that works with Napa County on Water Availability Analysis issues, and the following additional comments (lightly edited for clarity) were provided:

The "Project" is described as the development of 8.5 acres plus an additional acre for a landscape buffer, which suggests a total of 9.5 acres. Yet, the Civil Engineering Report (upon which the analysis in the EAR is based) relates the proposed water use to the 140-acre parcel. The Project acreage needs clarifying along with significantly more information if the 140-acre parcel size is the working acreage. The original peer review prepared by Coastland noted the resort site may be separated from the larger parcel area, in which case this would have very significant implications for the proposed water use on the 9.5-acre Project site.

Although there is some narrative provided in the Civil Engineering Report about the use of an existing well and its location, it is difficult to discern exactly where that well is located. The Sherwood Report describes that the Project "intends to leverage one of three existing groundwater wells onsite for water supply". The Report goes on to describe the approximate location of Well #1, although the Report is not clear that Well #1 is definitively the well that would supply the Project. If it is near the location suggested in the Utility Plan, that location may be within 1,500 feet of York Creek and would require a Tier 3 analysis. This analysis is especially significant with the proposed increase in groundwater pumping at the existing well. If the Project is determined to be appropriately within the 140-acre parcel, then the locations of all the wells on the parcel, their operation, water use, etc. would also need to be discussed and addressed.

The following comments are provided by City staff:

- The Initiative amends Policy PF 2.C of the Public Facilities and Services Element of the St. Helena 2040 General Plan to exempt the project from the requirement to connect to municipal urban services such as sewer, water, and storm drainage. It allows the project to use existing groundwater well(s) to meet the water demands of the proposed resort project provided "there is adequate water from existing on-site wells to provide potable water; emergency systems water

and irrigation water shall be supplied by recycled water and supplemented by on-site wells as needed. The WAP Overlay regulations established by the Initiative states that "Alternatively, such water may be provided by municipal water systems if permitted by the City (Section 17.21.060(G)(2))." In the event that water was to be provided by the City, the Project would have to comply with all City requirements related to new water connections, including but not limited to compliance with the City's water neutrality requirements.

V. REVIEW OF PROPONENT'S WORKFORCE HOUSING OBLIGATION & PROPOSAL

This section of the 9212 Report evaluates the Workforce Housing Obligation as presented in the Initiative and it provides a high-level critique of preliminary conceptual plans for a workforce housing project that were submitted to the City by the Initiative proponent on June 3, 2024.

A. Workforce Housing Obligation in Initiative

The Initiative establishes a new Overlay Zoning District in Chapter 17.21 of the Zoning Code entitled Section 17.21.060, "Winery and Planned Agritourism Overlay (WPA)." Subsection G "Other Uses, Standards, and Requirements" of the WPA Overlay regulations establishes a requirement for Workforce Housing, as follows:

5. **Workforce Housing.** An Applicant under this Section shall apply to the City for a permit to develop a minimum of fifty (50) units of rental workforce housing made available to rent at an affordable rent, adjusted for household size, to moderate-income households on a separate legal parcel within the City Limits ("Workforce Housing Obligation"). If the City approves any of the Applicant's proposed Workforce Housing Obligation, the City shall not apply any otherwise applicable affordable housing impact fee to the Project in accordance with applicable City regulations as contained in Chapter 17.30 of the St. Helena Municipal Code, as may be amended from time to time. If the City approves the Workforce Housing Obligation prior to the certificate of occupancy on the Project, Applicant shall cause construction of its Workforce Housing Obligation within 24 months of the City's approval of the Workforce Housing Obligation. If the City fails to approve the Workforce Housing Obligation prior to the certificate of occupancy on the Project, Applicant shall make a payment for the purpose of furthering the City's affordable housing goals pursuant to the requirements of St. Helena Municipal Code Section 17.30.020, as may be amended from time to time, to be paid to the City prior to issuance of the certificate of occupancy for the Project as the Project's sole obligation to provide affordable or workforce housing.

The Initiative also includes EDF (#49) which restates the Workforce Housing Obligation and establishes that the application for Workforce Housing must be made prior to issuance of a building permit for a project in the WPA Overlay.

While the resort will not need local planning approvals if the Initiative passes, the workforce housing component would be required to go through the planning approval process. The Initiative establishes an obligation for the proponent to submit an application for planning approvals for a workforce housing project of at least 50 units prior to receiving a building permit for the resort. It also includes an important caveat:

- If the application is not approved by the City by the time at which the resort obtains its certificate of occupancy (COO) - the proponent would not be required to construct the housing and, instead, can fulfill the Workforce Housing Obligation by paying a Housing Impact Fee in accordance with Section 17.30.020 of the St. Helena Municipal Code.

If, however, the housing project receives the required City approvals prior to issuance of the COO for the resort, then the Initiative requires that the housing project be constructed within 24 months of the City's approval.

The Initiative does not require:

- that the application that is submitted for the workforce housing project be deemed complete prior to issuance of the building permit for the resort.
- that the workforce housing project be located on a site that has General Plan and Zoning designations that allow multi-family residential uses.
- that the workforce housing project be designed in compliance with City development standards.
- that the proponent work diligently and expeditiously to address feedback received during the development review process.

The Initiative provides no incentives for the proponent to pursue approval of a workforce housing project in a timely manner, thus making the default option of "making a payment for the purpose of furthering the City's affordable housing goals" rather than constructing workforce housing readily available.

The City's 2023 fee schedule establishes Housing Impact fees of \$3.80/sq. ft. for Lodging uses. The proposed WPA Overlay establishes a maximum building area of 105,000 sq. ft. of conditioned space which, if fully utilized, would yield an Affordable Housing Payment of \$399,000. An updated fee of \$7.00/sq. ft. is currently under review and would yield an Affordable Housing Payment of \$735,000.

B. Fulton Lane Workforce Housing Project Description

On June 3, 2024, the Initiative proponent submitted a narrative description and concept plan for the proposed Fulton Lane Workforce Housing Project ([Appendix C](#)) to the City. The narrative states:

"The Fulton Lane Middle-Income Workforce Housing Project ("Project") is located on the south side of Fulton Lane at the railroad tracks. The entrance will start at the west side of the railroad tracks on Fulton Lane, enter a parking area, and continue through the parking area over the tracks to the east side between the two apartment buildings which will be located on the east side of the tracks.

The Project will consist of middle-income workforce housing units to support the labor force of the proposed St. Helena Resort, currently on the November ballot as the St. Helena Agritourism Initiative.

The Project is to be comprised of two (2) 2-story buildings totaling sixty-five (65) units, which shall consist of forty-nine (49) studio units, twelve (12) 1-bedroom units, and four (4) 4-bedroom units."

The Fulton Lane housing project site is owned by the Napa Valley Wine Train. It is on the southeast side of Fulton Lane (APN 009-193-006) and is bisected by the railroad tracks. The property encompasses approximately 1.9 acres including the railroad right-of-way. (Note: The concept plan and the County Assessor's records indicate that the site area is 2.54 acres, however, that is inaccurate.)

The General Plan land use classification for the property is "Office and the Zoning map designates it "Business and Professional Office" (BPO).

As shown on the Site Plan ([Appendix C](#)), one vehicular access would be provided to the site off of Fulton Lane, to the west of the railroad tracks. The Fulton Lane driveway immediately accesses a double-loaded parking lot with 49 parking spaces. At the end of the parking lot, an internal driveway would cross the railroad tracks to access the two apartment buildings and additional parking on the east side of the tracks. The two buildings are separated by a single-loaded parking lot with 16 spaces. Building A is a two-story corridor building with 38 studio units, two four-bedroom "co-living" units; and eight one-bedroom units (total of 48 units). Building B would have 11 studio units, four one-bedroom units, and two four-bedroom co-living units (total of 17 units). In total, the plans include 65 units and 65 parking spaces. The studio units have a net floor area of 309 sq. ft.; the one-bedroom units are 485 sq. ft., and the four-bedroom co-living units are 1,240 sq. ft.

C. Fulton Lane Workforce Housing Project - Issues

1. Site Constraints

The Fulton Lane housing project site is constrained by its size and parcel configuration as well as the railroad tracks that bisect it longitudinally. Issues included in locating residential development in close proximity to rail lines include:

- keeping pedestrians off of the railroad tracks
- ensuring that the at-grade driveway crossing is safe
- noise levels related to trains, bells/whistles, signals, etc.
- vibration related to trains
- air quality impacts related to trains.

The Site Plan indicates that the apartment buildings would be setback 5 ft. from the edge of the rail corridor.

2. Necessary General Plan and Zoning Amendments

Multi-family dwellings are permitted in the BPO zoning district with a Conditional Use Permit, however, the residential uses are restricted to upper floors only (Section 17.18.020.A). If the project were an affordable housing project containing low- and/or very low-income units, the City would be required to grant a density bonus and the project would be eligible for a concession (such as a waiver of the requirement that units only occur on the upper floors). However, the affordability level specified in the Initiative is for "moderate-income households" and moderate-income rental housing is not eligible for a density bonus, concessions, and/or incentives. Therefore, the project site would need to be reclassified in the General Plan and on the Zoning map to High Density Residential (HR) in order for the project to proceed.

3. Issues Related to Consistency with Development Standards

The following table summarizes Development Standards for multi-family uses in the HR zoning district.

Development Standard	High Density Residential (HR) Zone
Density	Max 28 du/ac
Min. Lot Area	7,000
Min. Lot Width	45 ft
Lot Coverage	55%
Max. Height	42 ft/3 stories
Min. Front Setback	15 ft
Min. Street Side Setback	15 ft
Min. Interior Side Setback	10 ft
Min. Rear Setback	10 ft

Development Standard	High Density Residential (HR) Zone
Private Open Space for Multi-Family Development	Min. 60 sq ft per unit
Min. dimension for Private Open Space	6 ft
Common Usable Open Space for Multi-family Development	Min. 150 sq ft/lot
Min. dimension for Common Usable Open Space	15 ft
Max. paved/Hardscaped Area	30% of a front setback area
Landscaped Area	25% of lot area
Required Buffer Abutting Agricultural Use and Residential Uses	A landscaped buffer - minimum 15' width, with street trees at 30 ft on center
Required Play Areas for multi-family development with 15 or more dwelling units	Minimum 600 sq ft; visible from dwelling units; play equipment; fencing
Parking Requirements- Multi-family dwellings	Studio and 1 BR units - 1 space per unit <i>2 BR or more</i> - 1.5 spaces per unit <i>Guest parking</i> - 25% of total required spaces when 15 or more units constructed

Density. If the 1.9-acre parcel is rezoned to HR, the maximum allowable density of 28 dwelling units/acre would yield a maximum of 53 units. This is sufficient to meet the minimum of 50 units required by the Initiative but falls short of the 65 units shown on the Site Plan submitted by the proponents.

Setbacks. As shown on the Site Plan, the side setback along the vineyards is 10' which complies with the Interior Side Setback requirement but does not comply with the 15' setback required for a buffer between agricultural and residential uses.

Usable Open Space. The Site Plan does not address the requirement for 60 sq. ft. per unit of Private Open Space. The four co-living units each have a 50 sq. ft. balcony and a couple of the studio units have 50 sq. ft. balconies, none of which meet the Private Open Space requirements.

Required Play Area. A play area of at least 600 square feet would be required. Based on the Site Plan, the only possible locations are on the Fulton Avenue frontage or between the east parking lot and the adjacent vineyard. It would be challenging to define Common Outdoor Recreation Space which is visible from the primary living space of at least 50% of the units, but it may be possible to make findings to support a variance to the visibility requirement due to the configuration of the property.

Parking. As shown on the Site Plan, 65 parking spaces are proposed. The parking requirement for the proposed unit mix is 84 spaces (67 spaces for residents plus 17 spaces for guests).

At-Grade Rail Crossing. Crossings and setbacks from rail corridors are regulated by the Federal Department of Transportation (DOT), the Federal Railroad Administration (FRA) and the California Public Utilities Commission (CPUC). A new private crossing such as that proposed within the Workforce Housing project would be assigned a federal crossing identification number. At a minimum, stop signs and pavement striping would be required for the at-grade crossing.

Emergency Access Requirements. The workforce housing project on the Fulton Lane site would need to have emergency access from Fulton Lane adjacent to Building A. The length of the building exceeds the maximum 150' standards for Fire Department access. The Fire Chief also noted concerns about conflicts between the emergency vehicle access and the ad-grade rail crossing.

Sewer Infrastructure. The sanitary sewer in Fulton Lane is prone to sanitary sewer overflows. Capacity to serve the workforce housing project could be an issue and upgrades to existing facilities may be needed.

Stormwater Management. An application for an affordable housing project on this site would need to demonstrate compliance with the City's requirements for onsite stormwater management. The Site Plan shows a landscaped area to the west of the parking lot which is situated on the adjacent property that is owned by the City. This is not an acceptable location- stormwater must be managed on-site.

4. Affordable Housing Related Issues

Compliance with City's Inclusionary Housing Requirements. The City requires that at least 20 percent of all new dwelling units in a residential development project shall be "affordable units." The Code does not address whether or not the inclusionary requirements would apply to a "moderate-income" housing project. If it were to be applied, the inclusionary housing requirement would only apply to the four co-living units which are 1,240 sq. ft. in size (since units up to 850 sq. ft. in size are exempted). This would yield a requirement for a fraction (0.8) of a unit. Per the City code, the developer may elect to construct one unit which is affordable to a very low-income household, perform an alternative equivalent action, or pay a housing in-lieu fee.

Ineligible for Density Bonus, Incentives and Concessions. State Density Bonus law requires jurisdictions to provide a density bonus for housing projects which provide affordable housing. The amount of the density bonus is set on a sliding scale, based on the percentage of affordable housing units and the level of affordability. For moderate-income housing, the density bonus only applies to for sale units, not to rental units. Therefore, the housing project, as proposed, would not be eligible for a density bonus. Further, since it is not eligible for a density bonus, it is not eligible for any concessions or waivers of development standards.

Marketability of the Product Type. The following table presents the rent limits for moderate-income households based on household size (based on 2024 HCD Income Limits).

Household size	1 person household	2-person household	3-person household	4-person household
Moderate income cap	\$108,850	\$124,400	\$139,950	\$155,500

Household size	1 person household	2-person household	3-person household	4-person household
Affordable moderate-income rent (30% of household income)	\$2,720/mo.	\$3,100/mo.	\$3,498/mo.	\$3,885/mo.
Housing unit type	studio	1 bedroom apt	2-bedroom apt	2-3 bedroom apt
Unit Sizes in Fulton Lane Project	309 sq. ft.	485 sq. ft.	none proposed	none proposed

One potential issue is that moderate-income renters in St. Helena can afford larger units with more amenities than those proposed in the Fulton Lane project. As designed, the units may be more appropriately targeted to low- and very low-income households. In order to serve moderate-income renters, the project should be redesigned with larger units, fewer studio units, more 1- and 2-bedroom units, and site amenities. It is questionable whether there is a market at the moderate-income level for the co-living units.

As a point of comparison, June 10, 2024 rental listings (Trulia; Zillow) for apartments in St. Helena include the following:

- Studio; 420 sq. ft.; \$1,645/mo (470 Bella Vista Ct. #C; St. Helena)
- 2 bd/1.5 ba; N/A sq. ft.; \$3,000/mo (1141 Oak Avenue; St. Helena)
- 2 bd/2.5 ba; 1,250 SF; \$2,750/mo (204 Rosebud Ln. #A; St. Helena)
- 2 bd/2 ba; 980 sq. ft.; \$2,750/mo (632 McCorkle Ave. #F; St. Helena)
- 3 bd/2 ba; 1,240 sq. ft.; \$3,100/mo (632 McCorkle Ave. #B; St. Helena)

An affordable housing complex in Calistoga that is under construction and includes on-site amenities is advertising rents for low-income households as follows:

- 1 bd/1ba/ 550 sq. ft.; \$2,127/mo. (Lincoln Avenue Apartments; Calistoga)
- 2 bd/1ba/ 750 sq. ft.; \$2,539/mo. (Lincoln Avenue Apartments; Calistoga)
- 3 bd/2ba/ 900 sq. ft.; \$2,919/mo. (Lincoln Avenue Apartments; Calistoga)

Regulatory Agreements/Ensuring Long-term Affordability of the Units. The application for the project would be required to include an Inclusionary Housing Plan. An Affordable Housing Agreement for the entire project would be needed to ensure its long-term affordability in accordance with the Initiative.

Use of Housing by Resort Employees. The Initiative proponents have indicated that the Workforce Housing Obligation would help offset the housing demands of resort staff. The Narrative Description of the Fulton Lane Housing Project states:

The Project will consist of middle-income workforce housing units to support the labor force of the proposed St. Helena Resort, currently on the November ballot as the St. Helena Agritourism Initiative.

The project website notes that an 8' wide public bicycle and pedestrian pathway would be constructed adjacent to the Napa Valley Wine Train tracks between the Charles Krug Winery property and Fulton Lane "to encourage alternative transportation to and from the workplace for future employees."

It should be noted that, despite these assertions, there is nothing in the Initiative that restricts the workforce housing units to resort employees. It is not clear from the proposal whether the workforce housing units are intended to be restricted to resort employees or intended to offset the housing demand created by the Project more generally. If the workforce housing units are restricted solely to resort employees, it would likely be subject to the State Employee Housing Act (Health & Safety Code Sec. 17000 et seq.), which requires additional oversight from HCD. Additionally, restricting the units to resort employees could raise fair housing issues that would need to be analyzed based on the specifics of the proposal.

Comments from Housing Authority, City of Napa. The proponent's workforce housing proposal was additionally reviewed by staff at the City of Napa Housing Authority. (The following comments have been lightly edited for clarity.)

- If this project is hoping to achieve the outcome of serving those that work for the proposed resort/hotel, the concept of moderate-income single occupancy units does not pair with the hospitality industry wages. We have rarely seen single individuals working in hospitality that are in the moderate-income range. When we see moderate-income households working in the hospitality sector, it is often in dual income households. More often than not this is a household of three or more individuals, which is not congruent with the studio/single bedroom concept. The recent Generation Housing report presented to the Napa County Board of Supervisors showed the biggest opportunity in rental housing is in the 3-bedroom, 4-bedroom, and larger size rentals.
- The proposed 4-bedroom co-living design has not been implemented in any housing projects that the City of Napa or Housing Authority has regulation authority over, so challenges with managing this kind of lease situation should be considered by the owner/property manager.

VI. REVIEW OF PROPONENT’S ECONOMIC & FISCAL IMPACT ANALYSIS

The *St. Helena Resort Economic and Fiscal Impact Analysis* ("Economic Report," see [Appendix D](#)) considers the economic and fiscal impacts of a proposed new resort project in St. Helena, California, and was prepared in April 2024 for Noble House Hotels & Resorts by Economic Forensics & Analytics, Inc. (EFA) located in Petaluma, CA. EFA is an independent research and consulting firm located in Sonoma County. EFA provides economic forecasting and economic impact analysis using the latest data available. EFA’s president, Robert Eyler, holds a doctorate in economics from the University of California at Davis and is a known and respected local economist with a thorough understanding of Sonoma and Napa counties.

For the purposes of this summary “Economic Report” and parenthetical page number reference refers to the report provided by EFA and “City Comments” refers to the comments provided by the City of St. Helena and its consultant, Regional Governmental Services (RGS).

Table 4, pg. 19 and Table 6, pg. 21 of the Economic Report provides estimated State and Local Tax Revenues from Construction and Operations and Total Economic Impacts data utilizing a blend of sources including: IMPLAN, Noble House Hotels & Resorts, and City of St. Helena documents. The economic tool used for part of the analysis, IMPLAN (“Impact analysis for PLANning”), is a PC-based computer software package that automates the process of developing input-output models for regions within the United States. The IMPLAN model is well-respected as the industry standard for projecting economic impacts resulting from current or further economic activities often called “events.”

Upon review of the Economic Report, staff did not encounter any known mathematical errors; however, the financial impact analysis addresses very broad economic impacts of the resort and does not identify the ongoing increased General Fund revenue streams for St. Helena alone.

The Noble House Project (“Project”) contains two phases of economic impact: (1) the construction phase, and (2) the operations phase. The Economic Report assumes the construction phase will take an estimated 15-18 months from groundbreaking and that the operations phase will start two months after the construction phase concludes.

While there will be positive economic impacts during the construction phase and value-added impacts because of the resort, the focus of this review of the Economic Report will be on the ongoing direct revenue attributed to the operations phase as it relates to the City of St. Helena, specifically in: Sales Tax, Transient Occupancy Tax (TOT), and Property Tax. The areas specifically analyzed for comparison are found in Table 4 of the Economic Report (pg. 19), are noted as “(Resort)”. All other categories in Table 4 have not been analyzed due to time constraints. A copy of Table 4 of the Economic Report is provided below for reference with the Resort estimated revenue highlighted in light blue.

Figure 1: Table 4 from Economic Report

Table 4: Estimated State and Local Tax Revenues from Construction (Const) and Operations

	Const	Const	Operations	Operations	Operations	Operations	Operations
	Year 1	Year 2	1	2	3	4	5
Property Taxes (IMPLAN)	\$248,400	\$82,800	\$208,500	\$287,600	\$362,100	\$423,800	\$454,400
Property Taxes (Resort)	\$-	\$730,400	\$745,000	\$759,900	\$775,100	\$790,600	\$806,400
Sales Taxes (Resort)	\$-	\$-	\$321,600	\$497,500	\$690,900	\$802,400	\$848,200
Sales Taxes (IMPLAN)	\$179,100	\$59,700	\$38,500	\$53,100	\$66,900	\$78,300	\$84,000
TOT (Resort)	\$-	\$-	\$1,425,900	\$1,883,800	\$2,268,100	\$2,671,400	\$2,882,600
Subtotal	\$427,500	\$872,900	\$2,739,500	\$3,481,900	\$4,163,100	\$4,766,500	\$5,075,600
Employment Taxes	\$548,400	\$182,800	\$60,100	\$82,900	\$104,400	\$122,100	\$130,900
Other Taxes and Fees	\$540,700	\$180,200	\$506,700	\$698,900	\$880,000	\$1,029,900	\$1,104,200
Totals	\$1,516,600	\$1,235,900	\$3,306,400	\$4,263,700	\$5,147,500	\$5,918,500	\$6,310,700
Subtotal Per Hotel Room	\$-	\$-	\$52,700	\$67,000	\$80,100	\$91,700	\$97,600

Sources: IMPLAN®, City of St. Helena, Noble House Hotels and Resorts, Author's Calculations

Note: Property taxes are assumed to be 1.18% of the assessed value post-construction and increase by 2% per year over the years, as shown in Table 4. Additional TOT Revenues are estimated at 13% of room revenues. We assumed 52 rooms.

A. Comparison of General Fund Revenue Estimates (Regional vs. St. Helena-focused)

Table 1, below, provides a summary comparing EFA's estimated operations revenues to the City's estimated operations revenues that would flow directly to the City's General Fund through the resort as compared to Figure 1 above. It is important to note, the calculations provided by EFA are not incorrect, but represent the broader economic impact and do not narrowly focus on the City's General Fund.

Table 1: Summary of EFA and City of St. Helena Direct General Fund Revenue Estimates

	Operations	Operations	Operations	Operations	Operations	Operations
	Year 1	Year 2	Year 3	Year 4	Year 5	5-Year Average
ECONOMIC REPORT ESTIMATES*						
Property Taxes	745,000	759,900	775,100	790,600	806,400	775,400
Sales Taxes	321,600	497,500	690,900	802,400	848,200	632,120
TOT Escalator	1,425,900	1,883,800	2,268,100	2,671,400	2,882,600	2,226,360
ECONOMIC REPORT ESTIMATES	2,492,500	3,141,200	3,734,100	4,264,400	4,537,200	3,633,880
CITY ESTIMATES						
Business License Tax	623	623	623	623	623	623
Property Taxes	114,616	116,908	119,246	121,631	127,713	120,023
Sales Taxes	204,671	214,905	225,650	236,932	248,779	226,187
TOT	1,368,667	1,409,727	1,452,019	1,495,579	1,540,447	1,453,288
CITY ESTIMATES (General Fund)	1,688,577	1,742,163	1,797,538	1,854,766	1,917,562	1,800,121
DIFFERENCE	(803,923)	(1,399,037)	(1,936,562)	(2,409,634)	(2,619,638)	(1,833,759)

* Calculations are not incorrect, but represent a broader economic impact not narrowly focused on the City's General Fund

Overall, the resort will bring in additional local revenues for the City. The estimated direct cash flow to the City's General Fund in the first five years of operations is noted in the green line.

B. Direct Economic Impacts to St. Helena Community

As stated above, the Economic Report presented a much broader picture of the economic impacts of the project; however, there are areas which the City and its consultant felt the need to show the direct and practical impacts to the St. Helena community, in contrast to regional benefits, and to provide some clarifying points to the Economic Report narrative. These are addressed through the following sections contained in this report:

1. Nightly Hotel Occupancy and Average Daily Rates
2. Transient Occupancy Tax (TOT) Estimates
3. Best- and Worst-Case Scenario Occupancy/Rates
4. Property Taxes
5. Sales Taxes
6. Other Miscellaneous Items

1. Nightly Hotel Occupancy and Average Daily Rates

The Economic Impact Report states the resort will be composed of 52 rooms (with the ability to create 56 rooms) and operations beginning in 2027. The Average Daily Room Rate (ADR) is estimated to be \$1,716 per night and the projected Occupancy Rate is 53.3%. While the City cannot speak to the room rate of the proposed development, as a comparison, the City and consultant utilized the following: (1) City of St. Helena FY 2023 Hotel/B&B actual Occupancy Percentage and ADR and (2) analytics from the 2020 Financing Civic Infrastructure Task Force final report (with CPI escalators applied to the ADR). Table 2 provides a comparison between the City's FY 2023 actuals, projections contained in the Financing Infrastructure Task Force Final Report, and the EFA reported 5-year average.

Table 2: Comparison of Actual and Estimated Occupancy and ADR

	Occupancy	ADR		
City FY 2023 Actuals	56%	\$ 525		
Option 1*	80%	\$ 648		
Option 2*	70%	\$ 1,415		
Vineland Station*	70%	\$ 914		
Farmstead*	75%	\$ 825		
Vine Resort*	70%	\$ 1,031		
EFA Economic Report 5-Year Avg.	53%	\$ 1,716		

*From the Financing Infrastructure Task Force Final Report 2020 with CPI adjusted

2. Transient Occupancy Tax (TOT) Estimates

The Economic Report estimates TOT will be collected at a total rate of 15% which includes:

- TOT – 12%
- Measure E – 1%
- TID – 2%

Out of the 15% collected, the City retains 13% as noted in the Economic Report (pg.20). Of this amount 12% is for general governmental purposes (General Fund) and 1% is restricted to Affordable and

Workforce Housing. The Economic Report reflects the entire 13% not recognizing 1% is restricted and projects the following in TOT revenues:

- \$1.42 million in Year 1 growing to \$2.8 million in Year 5 (p.3 and p.19)
- Average of \$2.57 million (p. 3 and p.6)

Table 3 provides the City’s estimated annual revenues based on the information provided by EFA. Overall, the City’s estimates for TOT are similar to the Economic Report; however, Table 3 breaks out the portion going to the City’s General Fund and the portion reserved for affordable and workforce housing.

Table 3: City of St. Helena Estimated TOT based on EFA's Occupancy and ADR

	# of Rooms	Total Avail. Rooms	Occupancy	Rooms Rented	ADR	Annual Room Income	TOT 12%	Measure E 1%
Year 1	52	18,980	32.5%	6,169	1,849	\$ 11,405,557	\$ 1,368,667	\$ 114,056
Year 5	52	18,980	71.5%	13,571	1,700	\$ 23,070,190	\$ 2,768,423	\$ 230,702
5-Year Average	52	18,980	55.3%	10,496	1,716	\$ 18,011,033	\$ 2,161,324	\$ 180,110
General Fund - Unrestricted								
Affordable Housing Trust Fund - Restricted, City Controls								

3. Best- and Worst-Case Scenario Occupancy/Rates – City Council Request

On May 28, 2024, City Council requested to have best- and worst-case scenarios included as part of the 9212 Report based on occupancy and ADR. While there were not best- and worst-case scenarios provided in the Economic Report, Table 4 provides a summary of ranges based on estimated TOT (12%) utilizing the five-year average ADR and occupancy rates provided by Noble House compared to various low/high scenarios based on the City’s past 5-year average occupancy rate for hotels and B&Bs and a range of ADR from \$600 to \$1,200. Based on this table, TOT receipts could range from \$693,985 to \$2.2 million depending on the ADR and assuming a 50.8% average occupancy rate.

Table 4: Summary of TOT Revenue Rates

	# of Rooms	Total Avail. Rooms	Occupancy	Rooms Rented	ADR	Annual Room Income	TOT 12%	Measure E 1%
Economic Impact Report 5-Year Average	52	18,980	55.3%	10,496	1,716	\$ 18,011,033	\$ 2,161,324	\$ 180,110
Updated Occupancy*	52	18,980	50.8%	9,639	1,716	\$ 16,539,969	\$ 1,984,796	\$ 165,400
Updated Occupancy/ADR Low	52	18,980	50.8%	9,639	600	\$ 5,783,206	\$ 693,985	\$ 57,832
Updated Occupancy/ADR High	52	18,980	50.8%	9,639	1,200	\$ 11,566,412	\$ 1,387,969	\$ 115,664

*Based on the City’s five-year average

4. Property Taxes

Property taxes will increase based on the change in Assessed Valuation (AV) of the property as determined by the County Assessor. This determination will generally be related to the square footage, the quality of the construction, and the construction costs. The Economic Report assumes the following regarding an increase in property taxes for the Resort:

- Property Tax Rate = 1.18%
- AV increase (post-construction) = \$61.9 million
- Subsequent AV increase in years one through five = 2%

Based on these assumptions, the Economic Report anticipates an increase in property taxes beginning in Year 2 of construction of \$730,400.

While, based on these assumptions, the amount projected to be collected is mathematically correct, it does not represent the amount that will be remitted by the County to the City’s General Fund, which is estimated to be approximately \$114,600.

Property taxes are collected by the Napa County Treasurer-Tax Collector’s Office and remitted to the City by the Auditor-Controller’s Office. The exact amount of the property taxes collected will vary each year based on many factors such as special district assessments or the amounts needed to pay for bonded indebtedness. The City’s consultant reached out to the County of Napa, who confirmed the following tax rates for 2800 Main Street:

Table 5: FY 2024 Property Tax Rate for 2800 Main Street

00001	COUNTY GENERAL 1% TAX	7	1.000000
06250	NAPA VALLEY COLLEGE ELECTION 2002 BOND	7	0.018900
08500	CITY OF ST. HELENA 2022 SERIES 2023 GOB	7	0.010800
09405	SHUSD ELECTION 2010 BOND	7	0.021100
09465	SHUSD ELECTION 2012 BOND	7	0.019100

As noted in Table 5 above, the County levies an ad valorem property tax rate equal to one percent (1%) of the full assessed value. This base levy is combined with other levies collected for repayment of various bonds authorized by voters in Napa County. The County General 1% Tax is, after collection from tax payers, divided among several property tax participating local public agencies. The City of St. Helena receives 0.185163% of the one percent property tax levy, as noted in Table 6.

Table 6: County General 1% Tax Breakdown

Tax Code	Description	Prior Year Alloc	Incr Factor
TRA: 003-000		Tax Increment: 415,593.94	
10000	NAPA COUNTY GENERAL	0.00	0.353677
10800	FIRE NON-STRUCTURAL	0.00	0.012452
15300	ST HELENA CITY OF	0.00	0.185163
38500	MOSQUITO ABATEMENT	0.00	0.004774
42000	RESOURCE CONSERVATION	0.00	0.001084
43100	BAY AREA AIR QUALITY	0.00	0.003230
45800	ST HELENA UNIFIED SCH	0.00	0.308552
46500	NAPA VALLEY COMMUNITY COLLEGE	0.00	0.096902
49000	NAPA COUNTY OFFICE OF EDUCATION	0.00	0.034166
49999	E R A F	0.00	0.000000
TRA Totals:		0.00	1.000000

The Economic Report states that \$730,400 in additional revenues will be collected because of the increased Assessed Valuation of the project (pg.10, Table 4 – Property Taxes (Resort)). The Economic Report reached this number through the following calculations:

$$\text{Construction Value} = \$61.9 \text{ million} \times 1.18\% = \$730,420$$

The number provided by EFA appears to illustrate the total amount collected by the County for property taxes and does not show the direct impact to the City’s General Fund. The direct impact increase to the City’s General Fund is illustrated in Table 7.

Table 7: Property Tax Direct Impact to the General Fund

Construction Costs	Napa County General	Napa County General \$	City of St. Helena	St. Helena General Fund Increase
61,900,000	1%	619,000	0.185163%	114,616

It should also be noted that it typically takes several months to have the new Assessed Valuation added to the County’s Property Tax Roll, and it is unlikely the City will receive any benefit until Year 1 of its operation.

5. Sales Taxes

The Economic Report (pg. 3) estimates \$38,500 to \$84,000 in new sales tax revenues over the first five years. This amount is consistent with information found on pg. 19 of the Economic Report under the section, “Sales Taxes (IMPLAN)”, but does not include “Sales Taxes (Resort)” which lists Operations Year 1 at \$321,600 in additional revenues, increasing to \$848,200 by Year 5 (pg. 19).

As noted earlier, the City is focusing on the Sales Tax (Resort) estimates. It is unclear from the Economic Report what estimated annual on- and off-premise spending per occupied room was used in their analysis. For a comparison estimate, the City utilized the 2020 Financing Infrastructure Task Force Analysis located on pg. 14 of their [Final Report](#) for an estimated sales tax calculation. Specifically, the City used the assumptions for Option 2 based on the ADR of \$1,200, which is the closest estimate to the project. Option 2 provided for the following assumptions and is summarized in Table 8:

- Estimated on-premises purchase per occupied rooms night = \$900
- Estimated off-premises purchase per occupied room night = \$400
- City’s sales tax rate = 1.5%

Table 8: St. Helena Projected Sales Tax Revenue

Rooms	52
Total Nights Available	365
Total Rooms Available	18,980
Occupancy	55.3%
Average Room Occupancy (# of rooms)	10,496
Estimated Purchases Per Occupied Room Night (on- and off-premise)	\$ 1,300
Sales Tax	1.50%
TOTAL ESTIMATED SALES TAX ANNUALLY	\$ 204,671
Total Annual Purchases	\$ 13,644,722
On-premise - \$900 / Off-premise - \$400	

The City’s analysis estimates \$204,671 in additional sales tax annually for the City of St. Helena, which is lower than the range of \$321,600 to \$848,200 provided in the Economic Report; however, it is possible the Economic Report may have utilized the total sales tax rate collected (6.0% State + 0.75% County + 1.5% City = 8.25%) where only 1.5% goes directly to the City’s General Fund.

On May 28, 2024, City Council requested an estimate of how the project may affect downtown businesses. The specific impacts to the downtown area are unknown and are difficult to project with certainty; however, as noted in Table 8, it is estimated there would be \$400 per occupied room night for off-premises purchases, which equates to approximately \$4.2 million per year in spending. It is assumed this would occur locally in St. Helena but may not be spent solely in the downtown area. Furthermore, the \$4.2 million estimate does not include any indirect economic impacts from the resort that may be the result of the estimated 70 full-time equivalent workers employed at the resort.

6. Other Miscellaneous Items

In addition to the direct fiscal analysis, the following are points of clarification on various comments made in the Economic Report.

1. TOT Revenues as collateral

- a. p.3 of the Economic Report – States that TOT revenues can act as collateral to finance borrowing for infrastructure and other needs that may support this project and pay the principal and interest payments.
- b. p.20 of the Economic Report – States the City has increased borrowing capacity and can use TOT as collateral.

City Comments: TOT revenues, like all General Fund tax revenues, may be used to pay debts including bonded indebtedness; however, it cannot be used as collateral as stated in the Economic Report.

2. Page 13 of the Economic Report states that Figure 10 (FY 2022-23) shows more expenditures towards public safety in FY 2022-23 as the budget expands with Measure E funds and sales tax revenues.

City Comments: The increase in Public Safety costs is not due to expanding Measure E and sales tax revenues but was a result of the Fire Department expanding to a full-service department. Additionally, the TOT revenue expansion referenced as Measure E, is restricted for Affordable and Workforce Housing and is not included in the City's General Fund budget for any general purposes.

3. Property Taxes - Pages 14 and 15: Figure 11 and Figure 12. The Economic Report states that Property taxes are the most significant revenue contributor in FY 2022-23 (Figure 11), but notes that they are, "somewhat encumbered for local education and initiatives that involve parcel taxes".

City Comments:

- a. The statement is correct that property taxes are the most significant revenue contributor in FY 2022-23 at 28%, with sales tax following at 26%.
- b. The statement that property taxes are, "somewhat encumbered for local education and initiatives that involve parcel taxes" is also correct as it relates to the total amount of property taxes collected by Napa County Tax Collector (See Table 7); however, the percentages noted in Figures 11 and 12 of the Economic Report reference the actual amount of property taxes received by the City, none of which is encumbered for local education and initiatives.

APPENDICES

- A. St. Helena Agritourism Initiative**
- B. Proponent’s Environmental Assessment Report**
- C. Proponent’s Workforce Housing Concept Plan**
- D. Proponent’s Economic & Fiscal Impact Analysis**
- E. Peer Review Reports**
 - 1. Air Quality & Greenhouse Gas Emissions**
 - 2. Biological Resources**
 - 3. Historic Resources**
 - 4. Archaeological Resources (CONFIDENTIAL/NOT ATTACHED)**
 - 5. Noise**
 - 6. Transportation**
 - 7. Water/Groundwater**

Appendix A. St. Helena Agritourism Initiative

See below for Link to St. Helena Resort Agritourism Initiative
[Agritourism Initiative](#)

Appendix B. Proponent's Environmental Assessment Report

See below for links to Proponent's Environmental Assessment Report and related appendices.

[St. Helena Resort Environmental Assessment – May 2024](#)

[Appendix A – Agritourism Initiative](#)

[Appendix B – Fiscal Analysis](#)

[Appendix C – AQ Modeling Outputs](#)

[Appendix D – Biological Database Searches](#)

[Appendix E – Cultural Resources Supporting Information](#)

[Appendix F – Civil Engineering Report](#)

[Appendix G – Phase I ESA](#)

[Appendix H – Noise Calculation Sheets](#)

[Appendix I – Transportation Impact Study](#)

Appendix C. Proponent’s Workforce Housing Concept Plan

Appendix C - Proponent's Workforce Housing Concept Plan

ST. HELENA RESORT FULTON LANE SITE, ST. HELENA, CA

Middle-Income Workforce Housing Project

The Fulton Lane Middle-Income Workforce Housing Project (“Project”) is located on the south side of Fulton Lane at the railroad tracks. The entrance will start at the west side of the railroad tracks on Fulton Lane, enter a parking area, and continue through the parking area over the tracks to the east side between the two apartment buildings which will be located on the east side of the tracks.

The Project will consist of middle-income workforce housing units to support the labor force of the proposed St. Helena Resort, currently on the November ballot as the St. Helena Agritourism Initiative.

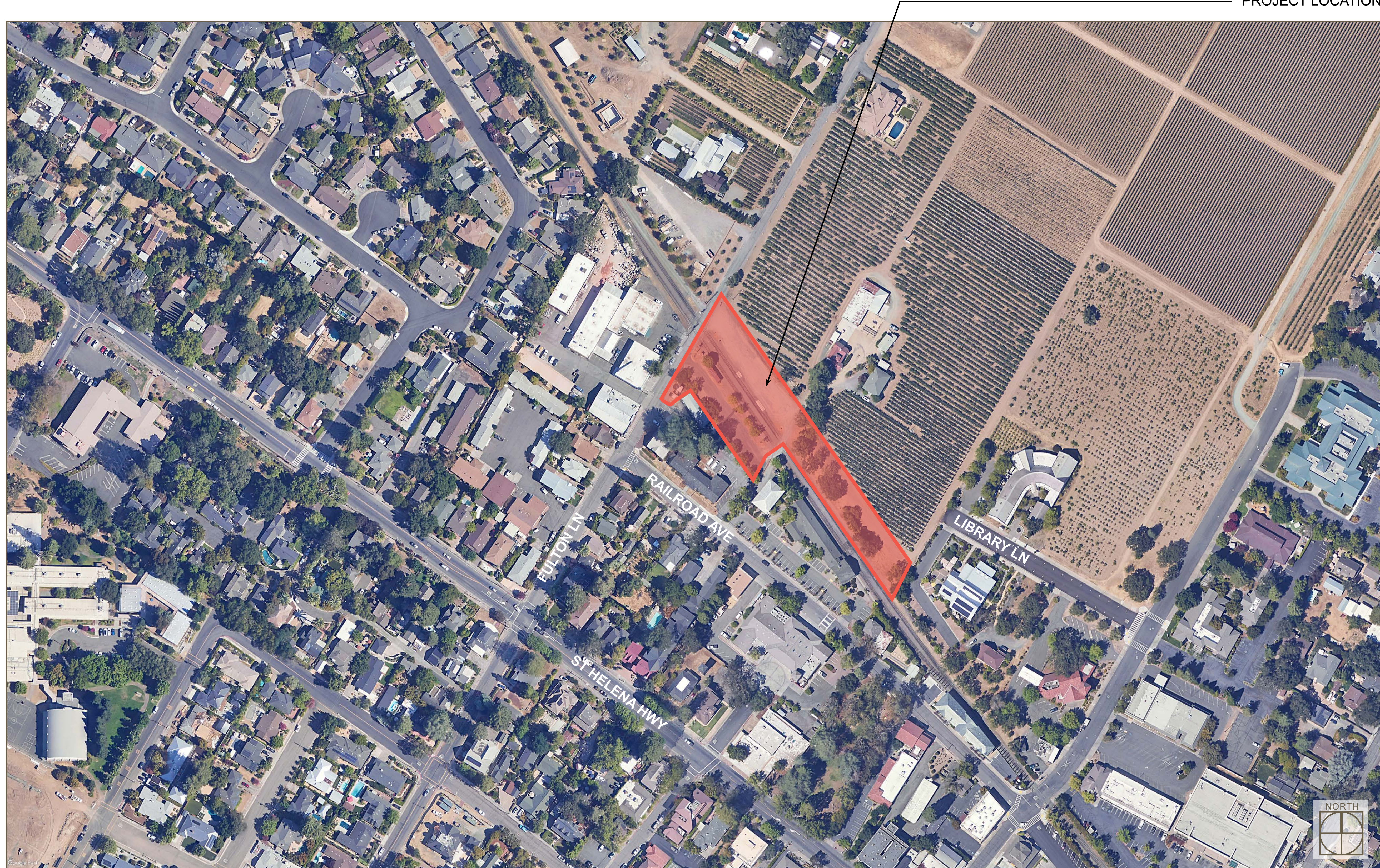
The Project is to be comprised of two (2) 2-story buildings totaling sixty-five (65) units, which shall consist of forty-nine (49) studio units, twelve (12) 1-bedroom units, and four (4) 4-bedroom units.

Attachments included:

1. Fulton Lane Site Concept Package
2. Income-Limits-2023

NAPA VALLEY WINE TRAIN - FULTON LANE SITE ST. HELENA, CA

VICINITY MAP:



PROJECT LOCATION

SHEET INDEX:

ARCHITECTURAL:

A1	TITLE SHEET
A2	SITE PLAN
A3	BUILDING PLANS
A4	TYPICAL UNIT PLANS

PROJECT DATA:

APN: 009-193-006-000
 SITE AREA: 2.54 AC
 PROPOSED DENSITY: 18.90 DUA

UNIT MIX

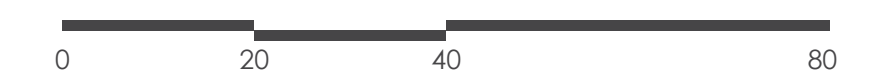
BUILDING A (2 STORIES):	
STUDIO UNITS	38
1-BED UNITS	8
4-BED UNITS	2
TOTAL	48
BUILDING B (2 STORIES):	
STUDIO UNITS	11
1-BED UNITS	4
4-BED UNITS	2
TOTAL	17
TOTAL:	
STUDIO UNITS	49
1-BED UNITS	12
4-BED UNITS	4
TOTAL	65

PARKING
 SPACES PROVIDED: 65

TITLE SHEET



SITE PLAN

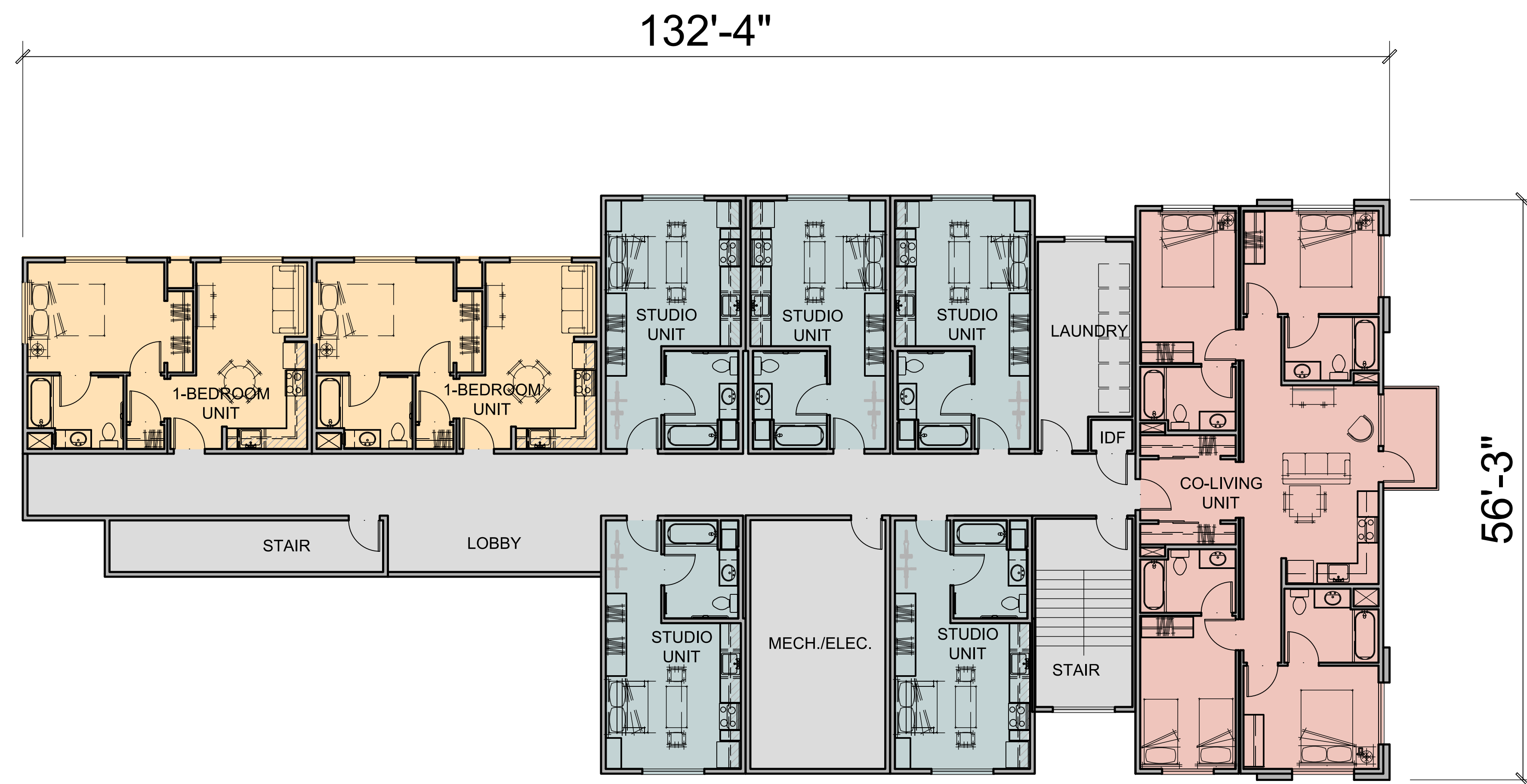


FULTON LANE SITE | ST. HELENA, CA
 NAPA VALLEY WINE TRAIN

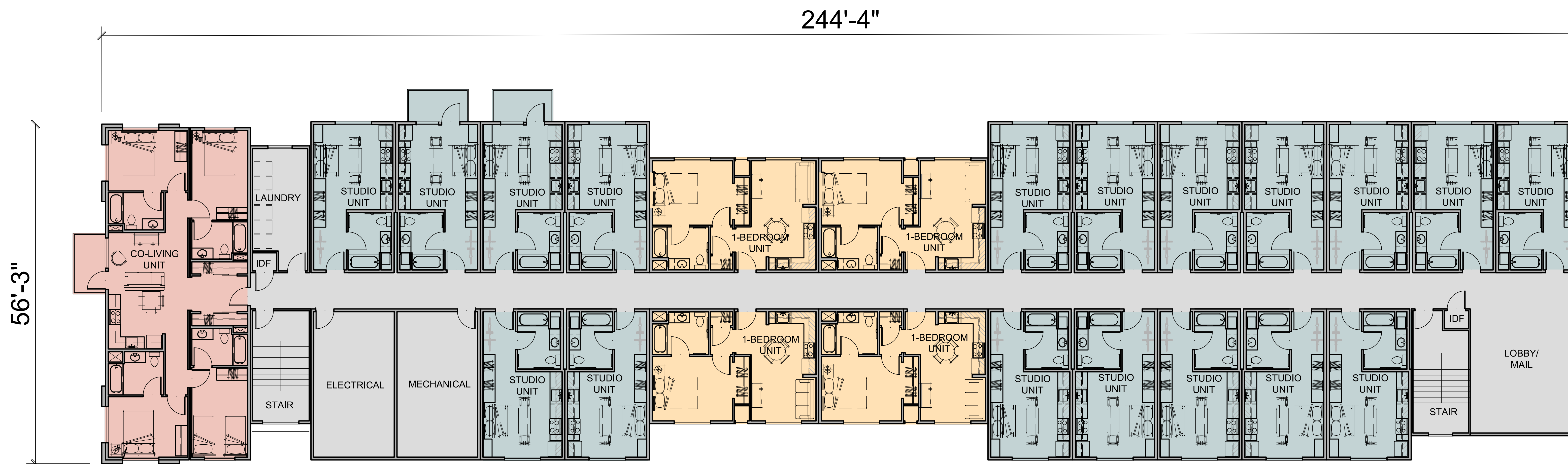


JOB NO. 1096.014
 DATE 03.21.2024
 5865 Owens Drive
 Pleasanton, CA 94588
 925-251-7200





2 BUILDING B - GROUND FLOOR PLAN

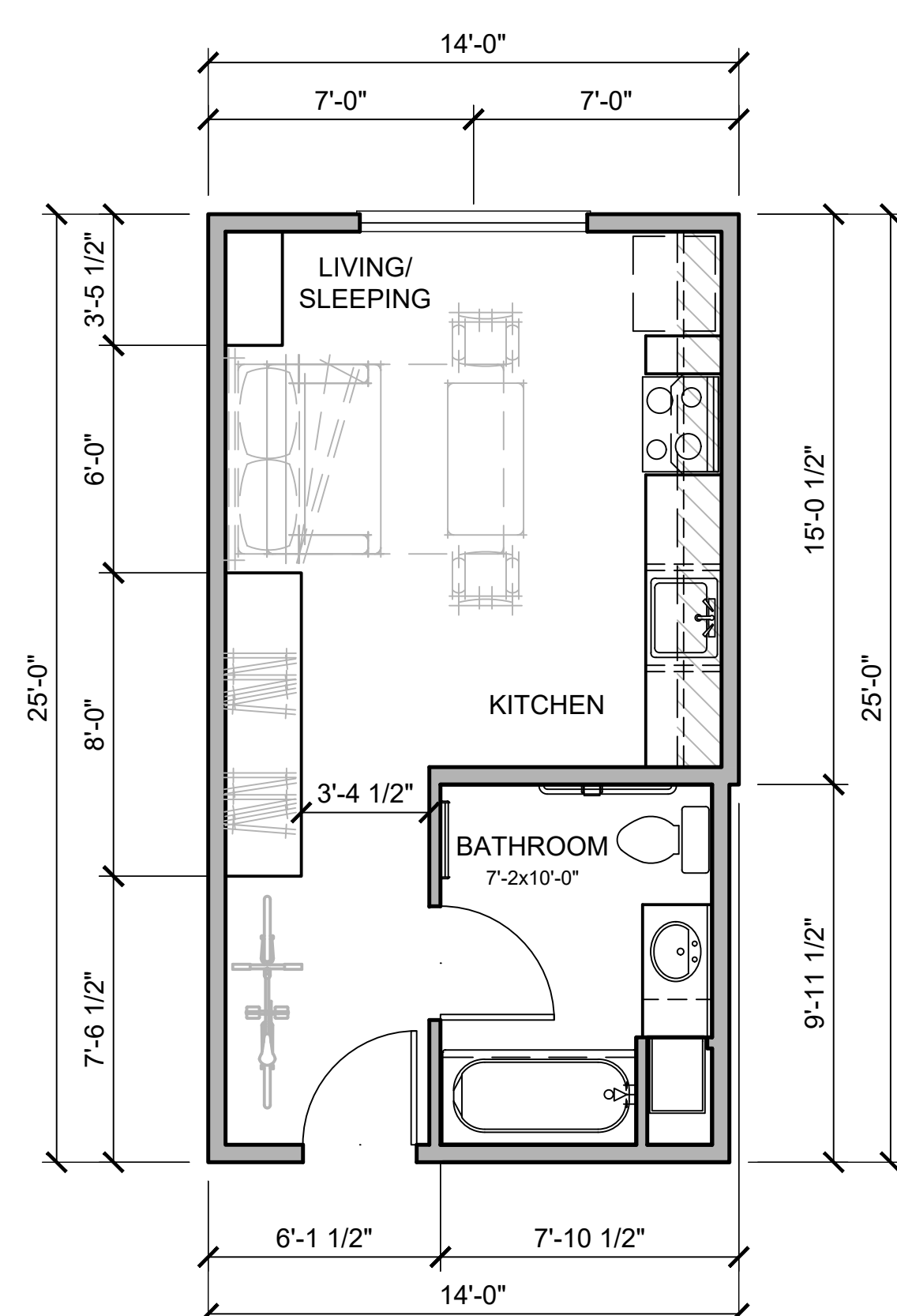


1 BUILDING A - GROUND FLOOR PLAN

COLOR KEY:
 ■ STUDIO UNIT
 ■ 1-BEDROOM UNIT
 ■ 4-BEDROOM UNIT

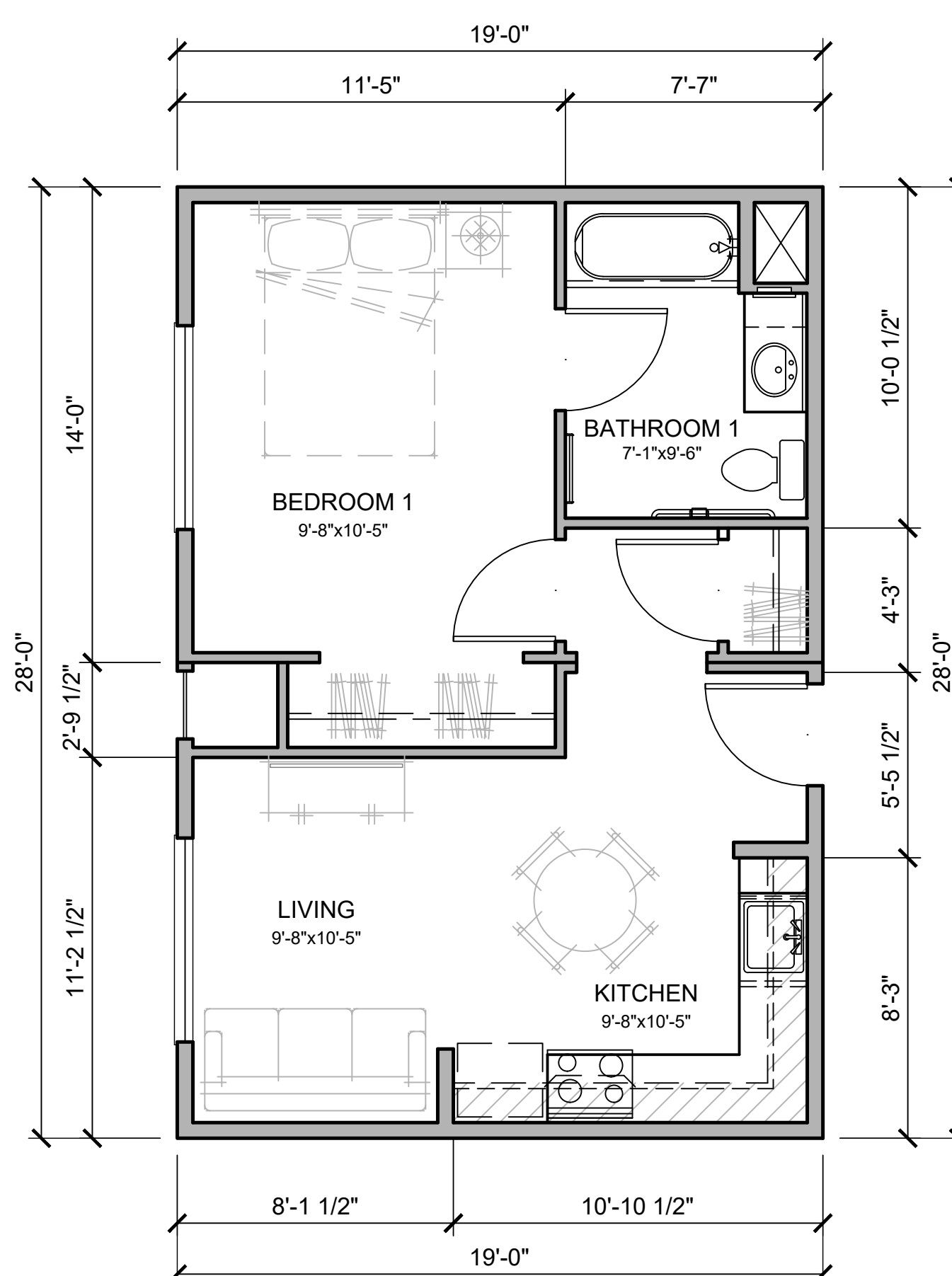
BUILDING PLANS





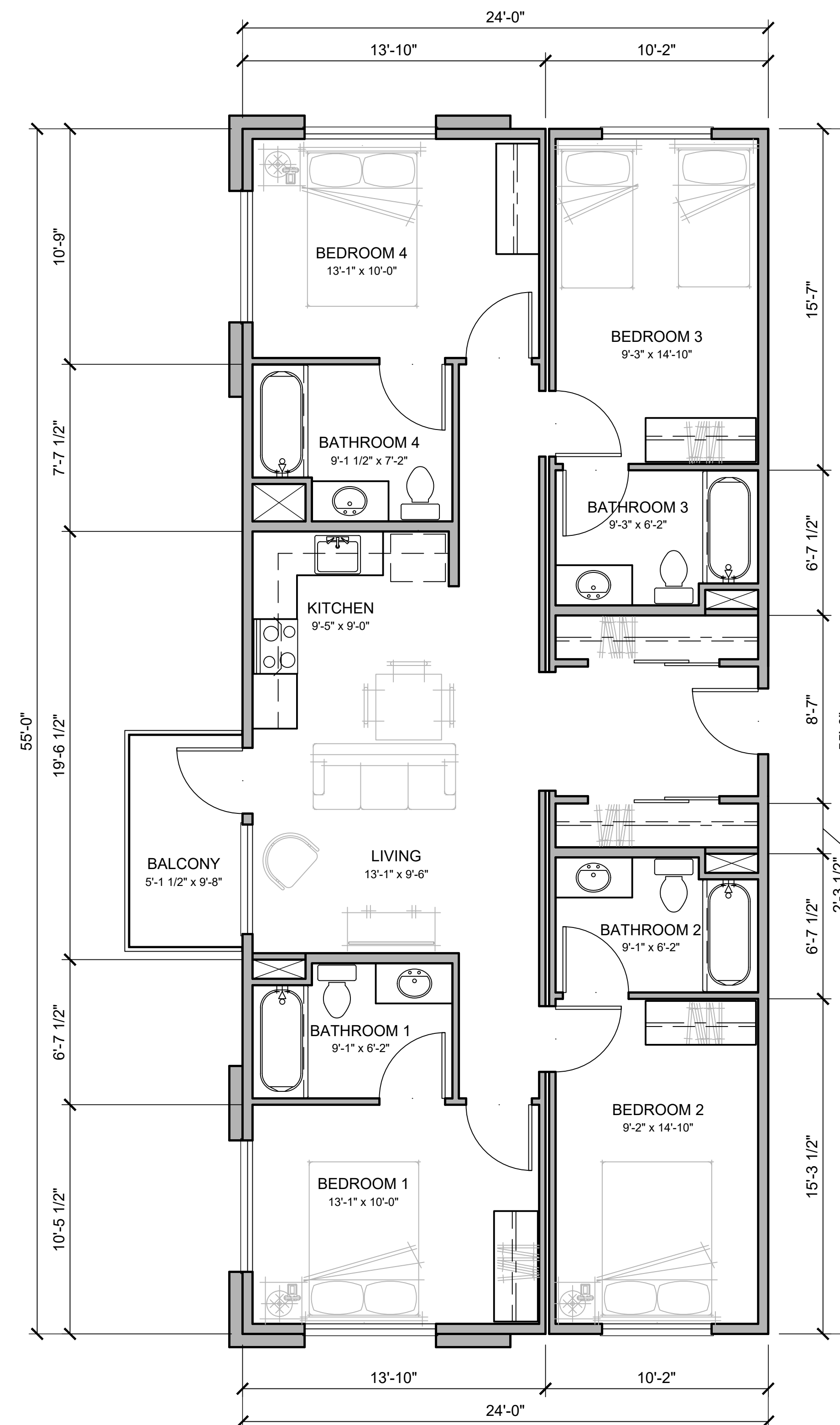
TYPICAL STUDIO UNIT

QUEEN SIZE MURPHY BED & 1 BATH
 GROSS AREA: 348 SQ. FT.
 NET AREA: 309 SQ. FT.
 BALCONY (WHERE OCCURS): 50 SQ. FT.



TYPICAL ONE BEDROOM UNIT

1 BEDROOM & 1 BATHROOM
 GROSS AREA: 532 SQ. FT.
 NET AREA: 485 SQ. FT.
 NO BALCONY PROPOSED



TYPICAL SRO CLUSTER (4 SRO'S)

4 BEDROOM & 4 BATHROOM
 GROSS AREA: 1320 SQ. FT.
 NET AREA: 1240 SQ. FT.
 BALCONY: 50 SQ. FT.

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT**

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Sacramento, CA 95833
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www.hcd.ca.gov



May 9, 2024

MEMORANDUM FOR: Interested Parties

FROM: Megan Kirkeby, Deputy Director
Division of Housing Policy Development

SUBJECT: **2024 State Income Limits**

Attached are briefing materials and 2024 State Income Limits that are now in effect, replacing the previous 2023 State Income Limits. Income limits reflect updated median income and household income levels for acutely low -, extremely low-, very low-, low-, and moderate-income households for California's 58 counties. The 2024 State Income Limits are on the Department of Housing and Community Development (HCD) website at <https://www.hcd.ca.gov/grants-and-funding/income-limits/state-and-federal-income-rent-and-loan-value-limits>.

State Income Limits apply to designated programs, are used to determine applicant eligibility (based on the level of household income) and may be used to calculate affordable housing costs for applicable housing assistance programs. Use of State Income Limits are subject to a particular program's definition of income, family, family size, effective dates, and other factors. In addition, definitions applicable to income categories, criteria, and geographic areas sometimes differ depending on the funding source and program, resulting in some programs using other income limits.

The attached briefing materials detail California's 2024 State Income Limits and were updated based on: (1) changes to income limits the U.S. Department of Housing and Urban Development (HUD) released on April 1, 2024, for its Public Housing, Section 8, Section 202, and Section 811 programs; and (2) adjustments HCD made based on State statutory provisions and its [2013 Hold Harmless \(HH\) Policy](#).

For questions concerning State Income Limits, please see the Questions and Answers on page 5 or contact StateIncomeLimits@hcd.ca.gov.

2024 State Income Limits Briefing Materials

California Code of Regulations, Title 25, Section 6932

Overview

The Department of Housing and Community Development (HCD), pursuant to Health & Safety Code Section 50093(c), must file updates to its State Income Limits with the Office of Administrative Law. HCD annually updates these income limits based on U.S. Department of Housing and Urban Development (HUD) revisions to the Public Housing and Section 8 Income Limits that HUD most recently released on April 1, 2024.

HUD annually updates its Public Housing and Section 8 Income Limits to reflect changes in median family income levels for different size households and income limits for extremely low-, very low-, and low-income households. HCD, pursuant to statutory provisions, makes the following additional revisions: (1) if necessary, increases a county's area median income to equal California's non-metropolitan median income, (2) adjusts Area Median Income (AMI) and household income category levels to not result in any year-over-year decrease for any year after 2009 pursuant to HCD's February 2013 Hold Harmless (HH) Policy. (HCD's HH Policy was implemented to replace HUD's HH Policy, discontinued in 2009, to ensure income limits and area median income levels do not fall below a prior year's highest level), and (3) determines income limits for California's acutely low-income and moderate-income categories.

Following are brief summaries of technical methodologies used by HUD and HCD in updating income limits for different household income categories. For additional information, please refer to HUD's briefing materials at <https://www.huduser.gov/portal/datasets/il/il24/IncomeLimitsMethodology-FY24.pdf>.

HUD Methodology

HUD Public Housing and Section 8 Income Limits begin with the production of median family incomes. HUD uses the Section 8 program's Fair Market Rent (FMR) area definitions in developing median incomes, which means developing median incomes for each metropolitan area, parts of some metropolitan areas, and each non-metropolitan county. The 2024 FMR area definitions for California are unchanged from last year. HUD calculates Income Limits for every FMR area with adjustments for family size and for areas with unusually high or low family income or housing-cost-to-income relationships.

Extremely Low-Income

In determining the extremely low-income limit, HUD uses the Federal Poverty Guidelines, published by the Department of Health and Human Services. The Federal Poverty Guidelines are a simplified version of the Federal Poverty Thresholds used for administrative purposes — for instance, determining financial eligibility for certain federal programs. HUD compares the appropriate poverty guideline with 60% of the very low-income limit and chooses the greater of the two as the extremely low-income limit. The value may not exceed the very low-income level.

Very Low-Income

The very low-income limits are the basis for the extremely low- and low-income limits. The very low-income limit typically reflects 50 percent of median family income (MFI), and HUD's MFI figure generally equals two times HUD's 4-person very low-income limit. However, HUD may adjust the very low-income limit for an area or county to account for conditions that warrant special considerations. As such, the very low-income limit may not always equal 50% MFI.

Low-Income

In general, most low-income limits represent the higher level of: (1) 80 percent of MFI or, (2) 80 percent of state non-metropolitan median family income. However, due to adjustments that HUD sometimes makes to the very low-income limit, strictly calculating low-income limits as 80 percent of MFI could

2024 State Income Limits Briefing Materials
California Code of Regulations, Title 25, Section 6932

produce unintended anomalies inconsistent with statutory intent (e.g., very low-income limits being higher than low-income limits). Therefore, HUD’s briefing materials specify that, with some exceptions, the low-income limit reflect 160 percent of the very low-income limit. HUD may apply additional adjustments to areas with unusually high or low housing-costs-to-income relationships and for other reasons. This can result in low-income limits exceeding MFI in certain counties.

Median Family Income/Area Median Income

HUD references and estimates the MFI in calculating the income limits. California law and State Income Limits reference AMI that, pursuant to Health & Safety Code section 50093(c), means the MFI of a geographic area of the State, as estimated annually by HUD for its Section 8 Program.

In estimating FY 2024 median family incomes, HUD uses median family income data (as opposed to median household income data) from the 2022 American Community Survey (ACS) as calculated by the Census Bureau. The Census Bureau produces two types of ACS estimates: the “one-year” data, which represent estimates as of 2022; and the “five-year” data, which represent estimates as of 2018-2022 (but are inflated to 2022 dollars). HUD requires special tabulations of the ACS to match its custom HMFA definitions described above.

HUD uses the 2022 ACS median family income data (as opposed to household income data) as the basis of FY 2024 Income Limits for all areas of California. HUD uses an inflation forecast from the Congressional Budget Office (CBO) in updating ACS estimates. For FY 2024, CBO has produced a forecast CPI of 310.683, which divided by annual 2022 of 292.613 is 1.062 (an increase of 6.2 percent).

For additional information on MFI’s please see HUD’s briefing materials at <https://www.huduser.gov/portal/datasets/il/il24/Medians-Methodology-FY24.pdf>.

Adjustment Calculations

HUD may apply adjustments to areas with unusually high or low family income, uneven housing-cost-to-income relationship, or other reasons. For example, HUD applies an increase if the four-person very low-income limit would otherwise be less than the amount at which 35 percent of it equals 85 percent of the annualized two-bedroom Section 8 FMR (or 40th percentile rent in 50th percentile FMR areas). The purpose is to increase the income limit for areas where rental-housing costs are unusually high in relation to the median income. In certain cases, HUD also applies an adjustment to the income limits based on the state non-metropolitan median family income level.

In addition, HUD restricts adjustments, so income limits do not increase more than five percent of the previous year’s very low-income figure OR twice the increase in the national MFI as measured by the ACS with an absolute cap of 10 percent, whichever is greater. For 2024, the annualized change is measured by the ACS from 2021 to 2022. Twice this change is approximately 14.8 percent, which is greater than the 10 percent absolute cap. So, for FY 2024, the income limits “cap” is 10 percent. HUD first announced this methodology on January 10, 2024 in a Federal Register Notice. The cap and floor rules do not apply to the extremely low-income limits.

Please refer to HUD briefing materials for additional information on the adjustment calculations.

Income Limit Calculations for Household Sizes Other Than 4-Persons

The income limit statute requires adjustments for family size. The legislative history and conference committee report indicates that Congress intended that income limits should be higher for larger families and lower for smaller families. The same family size adjustments apply to all income limits, except extremely low-income limits, which are set at the poverty income threshold. They are as follows:

Number of Persons in Household:	<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>	<u>6</u>	<u>7</u>	<u>8</u>
Adjustments:	70%	80%	90%	Base	108%	116%	124%	132%

2024 State Income Limits Briefing Materials California Code of Regulations, Title 25, Section 6932

Income Limit Calculations for Household Sizes Greater Than 8-Persons

For households of more than eight persons, refer to the formula at the end of the table for 2024 Income Limits. Due to the adjustments HUD can make to income limits in a given county, table data should be the only method used to determine program eligibility. Arithmetic calculations are applicable only when a household has more than eight members. New for FY 2024, family size-adjusted income limits are retested for compliance with the cap and floor rules. Please refer to HUD's briefing material for additional information on family size adjustments.

HCD Methodology

State law (see, e.g., Health & Safety Code section 50093) prescribes the methodology HCD uses to update the State Income Limits. HCD utilizes HUD's Public Housing and Section 8 Income Limits. HCD's methodology involves: (1) if necessary, increasing a county's median income established by HUD to equal California's non-metropolitan county median income determined by HUD, (2) applying HCD's HH Policy, in effect since 2013, to not allow decreases in AMI levels and household income category levels, (3) applying to the median income the same family size adjustments HUD applies to the income limits, (4) determining income limit levels applicable to California's acutely low-income households defined by law as household income not exceeding 15 percent of county AMI, and (5) determining income limit levels applicable to California's moderate-income households defined by law as household income not exceeding 120 percent of county AMI.

Area Median Income and Income Category Levels

HCD, pursuant to federal and State law, adjusts median income levels for all counties so they are not less than the non-metropolitan county median income established by HUD (\$87,900 for 2024). Next, HCD applies its HH Policy to ensure AMI and income limits for all household income categories do not fall below any level achieved in the prior year. Health and Safety Code section 50093 requires HCD to adjust the AMI for family size in accordance with adjustment factors adopted by HUD and illustrated on the previous page. This establishes that the MFI published by HUD equals the four-person AMI for California counties.

Acutely low-Income Levels

Beginning in 2022, Health and Safety Code section 50063.5 established California's acutely low-income household levels. After calculating the 4-person area median income (AMI) level as previously described, HCD sets the maximum acutely low-income limit to equal 15 percent of the county's AMI, adjusted for family size.

Moderate-Income Levels

HCD is responsible for establishing California's moderate-income limit levels. After calculating the 4-person AMI level as previously described, HCD sets the maximum moderate-income limit to equal 120 percent of the county's AMI, adjusted for family size.

Applicability of California's Official State Income Limits

Applicability of the State Income Limits are subject to particular programs as program definitions of factors such as income, family, and household size vary. Some programs, such as Multifamily Tax Subsidy Projects (MTSPs), use different income limits. For MTSPs, separate income limits apply per provisions of the Housing and Economic Recovery Act (HERA) of 2008 (Public Law 110-289). Income limits for MTSPs are used to determine qualification levels as well as set maximum rental rates for projects funded with tax credits authorized under Section 42 of the Internal Revenue Code (Code). In addition, MTSP income limits apply to projects financed with tax-exempt housing bonds issued to provide qualified residential rental development under Section 142 of the Code. These income limits are available at <http://www.huduser.org/datasets/mtsp.html>.

2024 State Income Limits Briefing Materials

California Code of Regulations, Title 25, Section 6932

Questions and Answers

In Los Angeles, as well as several other counties in the state, why does the very low-income limit not equal 50% of AMI (or the low-income limit not equal 80% of AMI)?

There are many exceptions to the arithmetic calculation of income limits. These include adjustments for high housing cost relative to income, the application of state nonmetropolitan income limits in low-income areas, and national maximums in high-income areas. **In Los Angeles County, as well as several others, the magnitude of these adjustments results in the low-income limit exceeding AMI.** These exceptions are detailed in the FY 2024 Income Limits Methodology Document, <https://www.huduser.gov/portal/datasets/il/il24/Medians-Methodology-FY24.pdf>.

For further information on the exact adjustments made to an individual area of the country, please see HUD's FY 2024 Income Limits Documentation System. The documentation system is available at https://www.huduser.gov/portal/datasets/il/il2024/select_Geography.odn. Once the area in question is selected, a summary of the area's median income, Very Low-Income, Extremely Low-Income, and Low-Income Limits are displayed. Detailed calculations are obtained by selecting the relevant links.

Why don't the income limits for my area reflect recent gains?

Although HUD uses the most recent data available concerning local area incomes, there is still a lag between when the data are collected and when the data are available for use. For example, FY 2024 Income Limits are calculated using 2018-2022 5-year American Community Survey (ACS) data, and one-year 2022 data where possible. This is a two-year lag, so more current trends in median family income levels are not available.

HUD estimates Median Family Income (MFI) annually for each metropolitan area and non-metropolitan county. The basis for HUD's median family incomes is data from the ACS, table B19113 - MEDIAN FAMILY INCOME IN THE PAST 12 MONTHS. A Consumer Price Index (CPI) forecast as published by the Bureau of Labor Statistics is used in the trend factor calculation to bring the 2021 ACS data forward to FY 2023.

For additional details concerning the use of the ACS in HUD's calculations of MFI, please see HUD's FY 2024 Median Family Income methodology document, at <https://www.huduser.gov/portal/datasets/il/il23/Medians-Methodology-FY24.pdf>

Additionally, full documentation of all calculations for MFIs is available in the FY 2024 Median Family Income and the FY 2024 Income Limits Documentation System. These systems are available at https://www.huduser.gov/portal/datasets/il/il2024/select_Geography.odn

Why didn't the income limits for my county change from last year?

HCD's 2013 Hold Harmless Policy likely prevented the income limits from decreasing from last year's levels and has maintained them despite a decrease in median income and/or income limits published by HUD.

Why do the income limits or area median income for my county not match what was published by HUD?

HCD adjusts each county's AMI to at least equal the state non-metropolitan county median income, as published by HUD. Further, HCD's 2013 Hold Harmless Policy prevents any decrease in income limits or median family income published by HUD to be applied to State Income Limits.

Section 6932. 2024 Income Limits

Number of Persons in Household:	1	2	3	4	5	6	7	8
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Last page instructs how to use income limits to determine applicant eligibility and calculate affordable housing cost and rent

Alameda County Area Median Income: \$155,700	Acutely Low	16350	18700	21000	23350	25200	27100	28950	30800
	Extremely Low	32700	37400	42050	46700	50450	54200	57950	61650
	Very Low Income	54500	62300	70100	77850	84100	90350	96550	102800
	Low Income	84600	96650	108750	120800	130500	140150	149800	159500
	Median Income	109000	124550	140150	155700	168150	180600	193050	205500
	Moderate Income	130800	149500	168150	186850	201800	216750	231700	246650

Alpine County Area Median Income: \$119,300	Acutely Low	12550	14300	16100	17900	19350	20750	22200	23650
	Extremely Low	22200	25400	28550	31700	36580	41960	47340	52720
	Very Low Income	37000	42250	47550	52850	57050	61300	65550	69750
	Low Income	59200	67650	76100	84550	91350	98100	104850	111650
	Median Income	83500	95450	107350	119300	128850	138400	147950	157500
	Moderate Income	100200	114500	128850	143150	154600	166050	177500	188950

Amador County Area Median Income: \$101,900	Acutely Low	10700	12250	13750	15300	16500	17750	18950	20200
	Extremely Low	21200	24200	27250	31200	36580	41960	47340	52720
	Very Low Income	35300	40350	45400	50400	54450	58500	62500	66550
	Low Income	56450	64550	72600	80650	87150	93600	100050	106500
	Median Income	71350	81500	91700	101900	110050	118200	126350	134500
	Moderate Income	85600	97850	110050	122300	132100	141850	151650	161450

Butte County Area Median Income: \$96,600	Acutely Low	10150	11600	13050	14500	15650	16800	18000	19150
	Extremely Low	19050	21800	25820	31200	36580	41960	47340	52720
	Very Low Income	31750	36300	40850	45350	49000	52600	56250	59850
	Low Income	50750	58000	65250	72500	78300	84100	89900	95700
	Median Income	67600	77300	86950	96600	104350	112050	119800	127500
	Moderate Income	81150	92700	104300	115900	125150	134450	143700	153000

Calaveras County Area Median Income: \$96,200	Acutely Low	10100	11550	13000	14450	15600	16750	17900	19050
	Extremely Low	20050	22900	25820	31200	36580	41960	47340	52720
	Very Low Income	33400	38150	42900	47650	51500	55300	59100	62900
	Low Income	53400	61000	68650	76250	82350	88450	94550	100650
	Median Income	67350	76950	86600	96200	103900	111600	119300	127000
	Moderate Income	80800	92350	103900	115450	124700	133900	143150	152400

Colusa County Area Median Income: \$87,900	Acutely Low	9250	10550	11900	13200	14250	15300	16350	17400
	Extremely Low	18450	21100	25820	31200	36580	41960	47340	52720
	Very Low Income	30800	35200	39600	43950	47500	51000	54500	58050
	Low Income	49250	56250	63300	70300	75950	81550	87200	92800
	Median Income	61550	70300	79100	87900	94950	101950	109000	116050
	Moderate Income	73850	84400	94950	105500	113950	122400	130800	139250

Contra Costa County Area Median Income: \$155,700	Acutely Low	16350	18700	21000	23350	25200	27100	28950	30800
	Extremely Low	32700	37400	42050	46700	50450	54200	57950	61650
	Very Low Income	54500	62300	70100	77850	84100	90350	96550	102800
	Low Income	84600	96650	108750	120800	130500	140150	149800	159500
	Median Income	109000	124550	140150	155700	168150	180600	193050	205500
	Moderate Income	130800	149500	168150	186850	201800	216750	231700	246650

Number of Persons in Household:	1	2	3	4	5	6	7	8
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Del Norte County Area Median Income: \$87,900	Acutely Low	9250	10550	11900	13200	14250	15300	16350	17400
	Extremely Low	18450	21100	25820	31200	36580	41960	47340	52720
	Very Low Income	30800	35200	39600	43950	47500	51000	54500	58050
	Low Income	49250	56250	63300	70300	75950	81550	87200	92800
	Median Income	61550	70300	79100	87900	94950	101950	109000	116050
	Moderate Income	73850	84400	94950	105500	113950	122400	130800	139250

El Dorado County Area Median Income: \$113,900	Acutely Low	11950	13700	15400	17100	18450	19850	21200	22550
	Extremely Low	24750	28300	31850	35350	38200	41960	47340	52720
	Very Low Income	41300	47150	53050	58950	63650	68400	73100	77850
	Low Income	66050	75450	84900	94300	101850	109400	116950	124500
	Median Income	79750	91100	102500	113900	123000	132100	141250	150350
	Moderate Income	95700	109350	123050	136700	147650	158550	169500	180450

Fresno County Area Median Income: \$87,900	Acutely Low	9250	10550	11900	13200	14250	15300	16350	17400
	Extremely Low	18450	21100	25820	31200	36580	41960	47340	52720
	Very Low Income	30800	35200	39600	43950	47500	51000	54500	58050
	Low Income	49250	56250	63300	70300	75950	81550	87200	92800
	Median Income	61550	70300	79100	87900	94950	101950	109000	116050
	Moderate Income	73850	84400	94950	105500	113950	122400	130800	139250

Glenn County Area Median Income: \$87,900	Acutely Low	9250	10550	11900	13200	14250	15300	16350	17400
	Extremely Low	18450	21100	25820	31200	36580	41960	47340	52720
	Very Low Income	30800	35200	39600	43950	47500	51000	54500	58050
	Low Income	49250	56250	63300	70300	75950	81550	87200	92800
	Median Income	61550	70300	79100	87900	94950	101950	109000	116050
	Moderate Income	73850	84400	94950	105500	113950	122400	130800	139250

Humboldt County Area Median Income: \$88,300	Acutely Low	9300	10600	11950	13250	14300	15350	16450	17500
	Extremely Low	18550	21200	25820	31200	36580	41960	47340	52720
	Very Low Income	30950	35350	39750	44150	47700	51250	54750	58300
	Low Income	49500	56550	63600	70650	76350	82000	87650	93300
	Median Income	61800	70650	79450	88300	95350	102450	109500	116550
	Moderate Income	74150	84750	95350	105950	114450	122900	131400	139850

Imperial County Area Median Income: \$87,900	Acutely Low	9250	10550	11900	13200	14250	15300	16350	17400
	Extremely Low	18450	21100	25820	31200	36580	41960	47340	52720
	Very Low Income	30800	35200	39600	43950	47500	51000	54500	58050
	Low Income	49250	56250	63300	70300	75950	81550	87200	92800
	Median Income	61550	70300	79100	87900	94950	101950	109000	116050
	Moderate Income	73850	84400	94950	105500	113950	122400	130800	139250

Inyo County Area Median Income: \$87,900	Acutely Low	9250	10550	11900	13200	14250	15300	16350	17400
	Extremely Low	18450	21100	25820	31200	36580	41960	47340	52720
	Very Low Income	30800	35200	39600	43950	47500	51000	54500	58050
	Low Income	49250	56250	63300	70300	75950	81550	87200	92800
	Median Income	61550	70300	79100	87900	94950	101950	109000	116050
	Moderate Income	73850	84400	94950	105500	113950	122400	130800	139250

Number of Persons in Household:	1	2	3	4	5	6	7	8
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Kern County Area Median Income: \$87,900	Acutely Low	9250	10550	11900	13200	14250	15300	16350	17400
	Extremely Low	18450	21100	25820	31200	36580	41960	47340	52720
	Very Low Income	30800	35200	39600	43950	47500	51000	54500	58050
	Low Income	49250	56250	63300	70300	75950	81550	87200	92800
	Median Income	61550	70300	79100	87900	94950	101950	109000	116050
	Moderate Income	73850	84400	94950	105500	113950	122400	130800	139250

Kings County Area Median Income: \$87,900	Acutely Low	9250	10550	11900	13200	14250	15300	16350	17400
	Extremely Low	18450	21100	25820	31200	36580	41960	47340	52720
	Very Low Income	30800	35200	39600	43950	47500	51000	54500	58050
	Low Income	49250	56250	63300	70300	75950	81550	87200	92800
	Median Income	61550	70300	79100	87900	94950	101950	109000	116050
	Moderate Income	73850	84400	94950	105500	113950	122400	130800	139250

Lake County Area Median Income: \$87,900	Acutely Low	9250	10550	11900	13200	14250	15300	16350	17400
	Extremely Low	18450	21100	25820	31200	36580	41960	47340	52720
	Very Low Income	30800	35200	39600	43950	47500	51000	54500	58050
	Low Income	49250	56250	63300	70300	75950	81550	87200	92800
	Median Income	61550	70300	79100	87900	94950	101950	109000	116050
	Moderate Income	73850	84400	94950	105500	113950	122400	130800	139250

Lassen County Area Median Income: \$87,900	Acutely Low	9250	10550	11900	13200	14250	15300	16350	17400
	Extremely Low	18450	21100	25820	31200	36580	41960	47340	52720
	Very Low Income	30800	35200	39600	43950	47500	51000	54500	58050
	Low Income	49250	56250	63300	70300	75950	81550	87200	92800
	Median Income	61550	70300	79100	87900	94950	101950	109000	116050
	Moderate Income	73850	84400	94950	105500	113950	122400	130800	139250

Los Angeles County Area Median Income: \$98,200	Acutely Low	10350	11800	13300	14750	15950	17100	18300	19450
	Extremely Low	29150	33300	37450	41600	44950	48300	51600	54950
	Very Low Income	48550	55450	62400	69350	74900	80450	86000	91550
	Low Income	77700	88800	99900	110950	119850	128750	137600	146500
	Median Income	68750	78550	88400	98200	106050	113900	121750	129600
	Moderate Income	82500	94300	106050	117850	127300	136700	146150	155550

Madera County Area Median Income: \$87,900	Acutely Low	9250	10550	11900	13200	14250	15300	16350	17400
	Extremely Low	18450	21100	25820	31200	36580	41960	47340	52720
	Very Low Income	30800	35200	39600	43950	47500	51000	54500	58050
	Low Income	49250	56250	63300	70300	75950	81550	87200	92800
	Median Income	61550	70300	79100	87900	94950	101950	109000	116050
	Moderate Income	73850	84400	94950	105500	113950	122400	130800	139250

Marin County Area Median Income: \$186,600	Acutely Low	19600	22400	25200	28000	30250	32500	34700	36950
	Extremely Low	41150	47000	52900	58750	63450	68150	72850	77550
	Very Low Income	68550	78350	88150	97900	105750	113600	121400	129250
	Low Income	109700	125350	141000	156650	169200	181750	194250	206800
	Median Income	130600	149300	167950	186600	201550	216450	231400	246300
	Moderate Income	156750	179100	201500	223900	241800	259700	277650	295550

Number of Persons in Household:	1	2	3	4	5	6	7	8
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Mariposa County Area Median Income: \$87,900	Acutely Low	9250	10550	11900	13200	14250	15300	16350	17400
	Extremely Low	18450	21100	25820	31200	36580	41960	47340	52720
	Very Low Income	30800	35200	39600	43950	47500	51000	54500	58050
	Low Income	49250	56250	63300	70300	75950	81550	87200	92800
	Median Income	61550	70300	79100	87900	94950	101950	109000	116050
	Moderate Income	73850	84400	94950	105500	113950	122400	130800	139250

Mendocino County Area Median Income: \$90,400	Acutely Low	9500	10850	12200	13550	14650	15700	16800	17900
	Extremely Low	19000	21700	25820	31200	36580	41960	47340	52720
	Very Low Income	31650	36200	40700	45200	48850	52450	56050	59700
	Low Income	50650	57850	65100	72300	78100	83900	89700	95450
	Median Income	63300	72300	81350	90400	97650	104850	112100	119350
	Moderate Income	75950	86800	97650	108500	117200	125850	134550	143200

Merced County Area Median Income: \$87,900	Acutely Low	9250	10550	11900	13200	14250	15300	16350	17400
	Extremely Low	18450	21100	25820	31200	36580	41960	47340	52720
	Very Low Income	30800	35200	39600	43950	47500	51000	54500	58050
	Low Income	49250	56250	63300	70300	75950	81550	87200	92800
	Median Income	61550	70300	79100	87900	94950	101950	109000	116050
	Moderate Income	73850	84400	94950	105500	113950	122400	130800	139250

Modoc County Area Median Income: \$87,900	Acutely Low	9250	10550	11900	13200	14250	15300	16350	17400
	Extremely Low	18450	21100	25820	31200	36580	41960	47340	52720
	Very Low Income	30800	35200	39600	43950	47500	51000	54500	58050
	Low Income	49250	56250	63300	70300	75950	81550	87200	92800
	Median Income	61550	70300	79100	87900	94950	101950	109000	116050
	Moderate Income	73850	84400	94950	105500	113950	122400	130800	139250

Mono County Area Median Income: \$105,900	Acutely Low	11150	12700	14300	15900	17150	18450	19700	21000
	Extremely Low	19650	22450	25820	31200	36580	41960	47340	52720
	Very Low Income	32700	37400	42050	46750	50450	54200	57950	61700
	Low Income	52350	59800	67300	74800	80750	86750	92750	98750
	Median Income	74150	84700	95300	105900	114350	122850	131300	139800
	Moderate Income	88950	101700	114400	127100	137250	147450	157600	167750

Monterey County Area Median Income: \$103,200	Acutely Low	10850	12400	13950	15500	16750	18000	19200	20450
	Extremely Low	27800	31800	35750	39700	42900	46100	49250	52720
	Very Low Income	46350	53000	59600	66200	71500	76800	82100	87400
	Low Income	74150	84800	95400	105950	114450	122950	131400	139900
	Median Income	72250	82550	92900	103200	111450	119700	127950	136200
	Moderate Income	86700	99100	111450	123850	133750	143650	153550	163500

Napa County Area Median Income: \$129,600	Acutely Low	13600	15550	17500	19450	21000	22550	24100	25650
	Extremely Low	30850	35250	39650	44050	47600	51100	54650	58150
	Very Low Income	51400	58700	66100	73400	79300	85150	91050	96900
	Low Income	82150	93900	105650	117350	126750	136150	145550	154900
	Median Income	90700	103700	116650	129600	139950	150350	160700	171050
	Moderate Income	108850	124400	139950	155500	167950	180400	192800	205250

Number of Persons in Household:	1	2	3	4	5	6	7	8
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Nevada County Area Median Income: \$112,500	Acutely Low	11850	13500	15200	16900	18250	19600	20950	22300
	Extremely Low	21900	25000	28150	31250	36580	41960	47340	52720
	Very Low Income	36500	41700	46900	52100	56300	60450	64650	68800
	Low Income	58350	66700	75050	83350	90050	96700	103400	110050
	Median Income	78750	90000	101250	112500	121500	130500	139500	148500
	Moderate Income	94500	108000	121500	135000	145800	156600	167400	178200

Orange County Area Median Income: \$129,000	Acutely Low	13550	15500	17400	19350	20900	22450	24000	25550
	Extremely Low	33150	37900	42650	47350	51150	54950	58750	62550
	Very Low Income	55250	63100	71050	78900	85250	91550	97850	104150
	Low Income	88400	101000	113650	126250	136350	146450	156550	166650
	Median Income	90300	103200	116100	129000	139300	149650	159950	170300
	Moderate Income	108350	123850	139300	154800	167200	179550	191950	204350

Placer County Area Median Income: \$113,900	Acutely Low	11950	13700	15400	17100	18450	19850	21200	22550
	Extremely Low	24750	28300	31850	35350	38200	41960	47340	52720
	Very Low Income	41300	47150	53050	58950	63650	68400	73100	77850
	Low Income	66050	75450	84900	94300	101850	109400	116950	124500
	Median Income	79750	91100	102500	113900	123000	132100	141250	150350
	Moderate Income	95700	109350	123050	136700	147650	158550	169500	180450

Plumas County Area Median Income: \$92,400	Acutely Low	9700	11100	12450	13850	14950	16050	17150	18300
	Extremely Low	19400	22150	25820	31200	36580	41960	47340	52720
	Very Low Income	32250	36850	41450	46050	49750	53450	57150	60800
	Low Income	51600	59000	66350	73700	79600	85500	91400	97300
	Median Income	64700	73900	83150	92400	99800	107200	114600	121950
	Moderate Income	77650	88700	99800	110900	119750	128650	137500	146400

Riverside County Area Median Income: \$97,500	Acutely Low	10250	11700	13200	14650	15800	17000	18150	19350
	Extremely Low	21550	24600	27700	31200	36580	41960	47340	52720
	Very Low Income	35900	41000	46100	51250	55350	59450	63550	67650
	Low Income	57400	65600	73800	82000	88600	95150	101650	108250
	Median Income	68250	78000	87750	97500	105300	113100	120900	128700
	Moderate Income	81900	93600	105300	117000	126350	135700	145100	154450

Sacramento County Area Median Income: \$113,900	Acutely Low	11950	13700	15400	17100	18450	19850	21200	22550
	Extremely Low	24750	28300	31850	35350	38200	41960	47340	52720
	Very Low Income	41300	47150	53050	58950	63650	68400	73100	77850
	Low Income	66050	75450	84900	94300	101850	109400	116950	124500
	Median Income	79750	91100	102500	113900	123000	132100	141250	150350
	Moderate Income	95700	109350	123050	136700	147650	158550	169500	180450

San Benito County Area Median Income: \$140,200	Acutely Low	14750	16850	18950	21050	22750	24400	26100	27800
	Extremely Low	25700	29400	33050	36700	39650	42600	47340	52720
	Very Low Income	42850	49000	55100	61200	66100	71000	75900	80800
	Low Income	68550	78350	88150	97950	105800	113600	121450	129300
	Median Income	98150	112150	126200	140200	151400	162650	173850	185050
	Moderate Income	117750	134600	151450	168250	181700	195150	208650	222100

Number of Persons in Household:	1	2	3	4	5	6	7	8
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San Bernardino County Area Median Income: \$97,500	Acutely Low	10250	11700	13200	14650	15800	17000	18150	19350
	Extremely Low	21550	24600	27700	31200	36580	41960	47340	52720
	Very Low Income	35900	41000	46100	51250	55350	59450	63550	67650
	Low Income	57400	65600	73800	82000	88600	95150	101650	108250
	Median Income	68250	78000	87750	97500	105300	113100	120900	128700
	Moderate Income	81900	93600	105300	117000	126350	135700	145100	154450

San Diego County Area Median Income: \$119,500	Acutely Low	12550	14350	16150	17950	19400	20800	22250	23700
	Extremely Low	31850	36400	40950	45450	49100	52750	56400	60000
	Very Low Income	53050	60600	68200	75750	81850	87900	93950	100000
	Low Income	84900	97000	109150	121250	130950	140650	150350	160050
	Median Income	83650	95600	107550	119500	129050	138600	148200	157750
	Moderate Income	100400	114700	129050	143400	154850	166350	177800	189300

San Francisco County Area Median Income: \$186,600	Acutely Low	19600	22400	25200	28000	30250	32500	34700	36950
	Extremely Low	41150	47000	52900	58750	63450	68150	72850	77550
	Very Low Income	68550	78350	88150	97900	105750	113600	121400	129250
	Low Income	109700	125350	141000	156650	169200	181750	194250	206800
	Median Income	130600	149300	167950	186600	201550	216450	231400	246300
	Moderate Income	156750	179100	201500	223900	241800	259700	277650	295550

San Joaquin County Area Median Income: \$103,800	Acutely Low	10900	12450	14000	15550	16800	18050	19300	20550
	Extremely Low	20250	23150	26050	31200	36580	41960	47340	52720
	Very Low Income	33750	38600	43400	48200	52100	55950	59800	63650
	Low Income	54000	61700	69400	77100	83300	89450	95600	101800
	Median Income	72650	83050	93400	103800	112100	120400	128700	137000
	Moderate Income	87200	99650	112100	124550	134500	144500	154450	164400

San Luis Obispo County Area Median Income: \$125,600	Acutely Low	13200	15100	16950	18850	20350	21850	23350	24900
	Extremely Low	26750	30600	34400	38200	41300	44350	47400	52720
	Very Low Income	44600	50950	57300	63650	68750	73850	78950	84050
	Low Income	71350	81550	91700	101900	110100	118250	126350	134500
	Median Income	87900	100500	113050	125600	135650	145700	155750	165800
	Moderate Income	105500	120550	135650	150700	162750	174800	186850	198900

San Mateo County Area Median Income: \$186,600	Acutely Low	19600	22400	25200	28000	30250	32500	34700	36950
	Extremely Low	41150	47000	52900	58750	63450	68150	72850	77550
	Very Low Income	68550	78350	88150	97900	105750	113600	121400	129250
	Low Income	109700	125350	141000	156650	169200	181750	194250	206800
	Median Income	130600	149300	167950	186600	201550	216450	231400	246300
	Moderate Income	156750	179100	201500	223900	241800	259700	277650	295550

Santa Barbara County Area Median Income: \$119,100	Acutely Low	12500	14300	16050	17850	19300	20700	22150	23550
	Extremely Low	34200	39050	43950	48800	52750	56650	60550	64450
	Very Low Income	56950	65050	73200	81300	87850	94350	100850	107350
	Low Income	91200	104250	117300	130350	140800	151250	161600	172050
	Median Income	83350	95300	107200	119100	128650	138150	147700	157200
	Moderate Income	100050	114300	128600	142900	154350	165750	177200	188650

Number of Persons in Household:	1	2	3	4	5	6	7	8
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Santa Clara County Area Median Income: \$184,300	Acutely Low	19350	22100	24900	27650	29850	32050	34300	36500
	Extremely Low	38750	44250	49800	55300	59750	64150	68600	73000
	Very Low Income	64550	73750	82950	92150	99550	106900	114300	121650
	Low Income	102300	116900	131500	146100	157800	169500	181200	192900
	Median Income	129000	147450	165850	184300	199050	213800	228550	243300
	Moderate Income	154800	176900	199050	221150	238850	256550	274250	291900

Santa Cruz County Area Median Income: \$132,800	Acutely Low	13950	15900	17900	19900	21500	23100	24700	26250
	Extremely Low	38050	43500	48950	54350	58700	63050	67400	71750
	Very Low Income	63400	72450	81500	90550	97800	105050	112300	119550
	Low Income	101750	116250	130750	145300	156950	168550	180200	191800
	Median Income	92950	106250	119500	132800	143400	154050	164650	175300
	Moderate Income	111550	127500	143400	159350	172100	184850	197600	210350

Shasta County Area Median Income: \$89,800	Acutely Low	9400	10750	12100	13450	14550	15600	16700	17750
	Extremely Low	18750	21400	25820	31200	36580	41960	47340	52720
	Very Low Income	31200	35650	40100	44550	48150	51700	55250	58850
	Low Income	49950	57050	64200	71300	77050	82750	88450	94150
	Median Income	62850	71850	80800	89800	97000	104150	111350	118550
	Moderate Income	75450	86200	97000	107750	116350	125000	133600	142250

Sierra County Area Median Income: \$90,000	Acutely Low	9450	10800	12150	13500	14600	15650	16750	17800
	Extremely Low	18900	21600	25820	31200	36580	41960	47340	52720
	Very Low Income	31500	36000	40500	45000	48600	52200	55800	59400
	Low Income	50400	57600	64800	72000	77800	83550	89300	95050
	Median Income	63000	72000	81000	90000	97200	104400	111600	118800
	Moderate Income	75600	86400	97200	108000	116650	125300	133900	142550

Siskiyou County Area Median Income: \$87,900	Acutely Low	9250	10550	11900	13200	14250	15300	16350	17400
	Extremely Low	18450	21100	25820	31200	36580	41960	47340	52720
	Very Low Income	30800	35200	39600	43950	47500	51000	54500	58050
	Low Income	49250	56250	63300	70300	75950	81550	87200	92800
	Median Income	61550	70300	79100	87900	94950	101950	109000	116050
	Moderate Income	73850	84400	94950	105500	113950	122400	130800	139250

Solano County Area Median Income: \$113,200	Acutely Low	11900	13600	15300	17000	18350	19700	21100	22450
	Extremely Low	26450	30200	34000	37750	40800	43800	47340	52720
	Very Low Income	44050	50350	56650	62900	67950	73000	78000	83050
	Low Income	70450	80500	90550	100650	108700	116750	124850	132850
	Median Income	79250	90550	101900	113200	122250	131300	140350	149400
	Moderate Income	95100	108700	122250	135850	146700	157600	168450	179300

Sonoma County Area Median Income: \$128,400	Acutely Low	13500	15400	17350	19250	20800	22350	23850	25400
	Extremely Low	29050	33200	37350	41500	44850	48150	51500	54800
	Very Low Income	48450	55350	62250	69150	74700	80250	85750	91300
	Low Income	77500	88600	99650	110700	119600	128450	137300	146150
	Median Income	89900	102700	115550	128400	138650	148950	159200	169500
	Moderate Income	107850	123300	138700	154100	166450	178750	191100	203400

Number of Persons in Household:	1	2	3	4	5	6	7	8
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Stanislaus County Area Median Income: \$92,600	Acutely Low	9750	11100	12500	13900	15000	16100	17250	18350
	Extremely Low	19150	21900	25820	31200	36580	41960	47340	52720
	Very Low Income	31900	36450	41000	45550	49200	52850	56500	60150
	Low Income	51050	58350	65650	72900	78750	84600	90400	96250
	Median Income	64800	74100	83350	92600	100000	107400	114800	122250
	Moderate Income	77750	88900	100000	111100	120000	128900	137750	146650

Sutter County Area Median Income: \$87,900	Acutely Low	9250	10550	11900	13200	14250	15300	16350	17400
	Extremely Low	18450	21100	25820	31200	36580	41960	47340	52720
	Very Low Income	30800	35200	39600	43950	47500	51000	54500	58050
	Low Income	49250	56250	63300	70300	75950	81550	87200	92800
	Median Income	61550	70300	79100	87900	94950	101950	109000	116050
	Moderate Income	73850	84400	94950	105500	113950	122400	130800	139250

Tehama County Area Median Income: \$87,900	Acutely Low	9250	10550	11900	13200	14250	15300	16350	17400
	Extremely Low	18450	21100	25820	31200	36580	41960	47340	52720
	Very Low Income	30800	35200	39600	43950	47500	51000	54500	58050
	Low Income	49250	56250	63300	70300	75950	81550	87200	92800
	Median Income	61550	70300	79100	87900	94950	101950	109000	116050
	Moderate Income	73850	84400	94950	105500	113950	122400	130800	139250

Trinity County Area Median Income: \$87,900	Acutely Low	9250	10550	11900	13200	14250	15300	16350	17400
	Extremely Low	18450	21100	25820	31200	36580	41960	47340	52720
	Very Low Income	30800	35200	39600	43950	47500	51000	54500	58050
	Low Income	49250	56250	63300	70300	75950	81550	87200	92800
	Median Income	61550	70300	79100	87900	94950	101950	109000	116050
	Moderate Income	73850	84400	94950	105500	113950	122400	130800	139250

Tulare County Area Median Income: \$87,900	Acutely Low	9250	10550	11900	13200	14250	15300	16350	17400
	Extremely Low	18450	21100	25820	31200	36580	41960	47340	52720
	Very Low Income	30800	35200	39600	43950	47500	51000	54500	58050
	Low Income	49250	56250	63300	70300	75950	81550	87200	92800
	Median Income	61550	70300	79100	87900	94950	101950	109000	116050
	Moderate Income	73850	84400	94950	105500	113950	122400	130800	139250

Tuolumne County Area Median Income: \$97,700	Acutely Low	10250	11700	13200	14650	15800	17000	18150	19350
	Extremely Low	20350	23250	26150	31200	36580	41960	47340	52720
	Very Low Income	33900	38750	43600	48450	52350	56200	60100	63950
	Low Income	54250	62000	69750	77450	83650	89850	96050	102250
	Median Income	68400	78150	87950	97700	105500	113350	121150	128950
	Moderate Income	82100	93800	105550	117250	126650	136000	145400	154750

Ventura County Area Median Income: \$125,600	Acutely Low	13200	15100	16950	18850	20350	21850	23350	24900
	Extremely Low	29550	33800	38000	42200	45600	49000	52350	55750
	Very Low Income	49250	56300	63350	70350	76000	81650	87250	92900
	Low Income	78800	90050	101300	112550	121600	130600	139600	148600
	Median Income	87900	100500	113050	125600	135650	145700	155750	165800
	Moderate Income	105500	120550	135650	150700	162750	174800	186850	198900

Number of Persons in Household:	1	2	3	4	5	6	7	8
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Yolo County Area Median Income: \$117,000	Acutely Low	12300	14050	15800	17550	18950	20350	21750	23150
	Extremely Low	24250	27700	31150	34600	37400	41960	47340	52720
	Very Low Income	40400	46150	51900	57650	62300	66900	71500	76100
	Low Income	64600	73800	83050	92250	99650	107050	114400	121800
	Median Income	81900	93600	105300	117000	126350	135700	145100	154450
	Moderate Income	98300	112300	126350	140400	151650	162850	174100	185350

Yuba County Area Median Income: \$87,900	Acutely Low	9250	10550	11900	13200	14250	15300	16350	17400
	Extremely Low	18450	21100	25820	31200	36580	41960	47340	52720
	Very Low Income	30800	35200	39600	43950	47500	51000	54500	58050
	Low Income	49250	56250	63300	70300	75950	81550	87200	92800
	Median Income	61550	70300	79100	87900	94950	101950	109000	116050
	Moderate Income	73850	84400	94950	105500	113950	122400	130800	139250

Instructions:

Eligibility Determination:

Use household size income category figures in this chart.

Determine eligibility based on actual number of persons in household and total of gross income for all persons.

Determination of Income Limit for Households Larger than Eight Persons:

Per person (PP) adjustment above 8: (1) multiply 4-person income limit by eight percent (8%),

(2) multiply result by number of persons in excess of eight,

(3) add the amount to the 8-person income limit, and (4) round to the nearest \$50.

Nine Person Calculation - Example County

E X A M P L E	4 persons	8% PP Adj	+ 8 persons	=9 persons
Acutely Low Income	13,200	1056	17,400	18,450
Extremely Low Income	31,200	2496	52,720	55,200
Very Low Income	43,950	3516	58,050	61,550
Lower Income	70,300	5624	92,800	98,400
Moderate Income	105,500	8440	139,250	147,700

Ten Person Calculation - Example County

4 persons	8 person +	8% Adj x 2	=10 persons
13,200	17,400	2112	19,500
31,200	52,720	4992	57,700
43,950	58,050	7032	65,100
70,300	92,800	11248	104,050
105,500	139,250	16880	156,150

Calculation of Housing Cost and Rent:

Refer to Health & Safety Code Sections 50052.5 and 50053. Use benchmark household size and multiply against applicable percentages defined in H&SC using Area Median Income identified in this chart.

Determination of Household Size:

For projects with no federal assistance, household size is set at number of bedrooms in unit plus one.

For projects with federal assistance, household size may be set by multiplying 1.5 by the number of bedrooms in unit.

HUD Income Limits release: 4/1/2024

HUD FY 2024 California median incomes:

State median income: \$111,300

Metropolitan county median income: \$111,900

Non-metropolitan county median income: \$87,900

Note: Authority cited: Section 50093, Health and Safety Code. Reference: Sections 50063.5, 50079.5, 50093, 50105 and 50106, Health and Safety Code.

Appendix D. Proponent’s Economic & Fiscal Impact Analysis



St. Helena Resort

Economic and Fiscal Impact Analysis

April 2024

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Executive Summary

This report considers the economic and fiscal impacts of a proposed new resort project in St. Helena, California. This project has two phases: augmented property taxes are gains for the City of St. Helena that connect the construction phase to the operations phase. The property is located just north of St. Helena’s “downtown” area, providing easy access to shopping, restaurants, and other merchants in St. Helena and throughout Napa Valley. Sales tax, property tax, and transient occupancy tax revenues are critical fiscal impacts that increase revenues for the City of St. Helena once operations begin and are annual and ongoing.

The construction phase includes an estimated \$71.1 million of onsite, hard-cost spending and administrative (soft-cost) expenses over 15 to 18 months. This spending brings materials into St. Helena, hires workers within and outside the city limits, and provides income to professional services firms and the city government. St. Helena’s economy gains primarily from worker spending and materials purchased from local merchants as needed. Some fixtures, furniture, and equipment may also be sourced from St. Helena-based businesses and professional services. Our estimates suggest that 339 full-time equivalent workers related to construction are paid approximately \$23.6 million in wages. The spending and jobs on-site support another five jobs and over \$977,500 in additional incomes earned throughout St. Helena, including another \$459,400 in wages and salaries for St. Helena residents. Those incomes, in sum, create approximately \$570,000 in local tax revenues before the increase in the resort site’s assessed value. The increase in property taxes for the City of St. Helena is approximately \$730,400 due to property improvements. The property tax revenue gains continue into the operations phase.

Once construction ends, 52 new resort rooms will open, and overnight stays begin. Daily operations also have “multiplier” or additional effects on St. Helena’s economy, as visitors come to the resort and then go to local restaurants, wineries, retailers, and other merchants as places to visit and to spend while in St. Helena. The estimated amount spent on overnight stays on the property drives our estimates of overall spending. Based on assumptions of an annual average of 55.3 percent occupancy and an average daily rate (ADR) of \$1,716 over five years, the annual gains from years 1 to 5 are as follows in terms of core visitor spending based on overnight stays at the property and subsequent effects on the city economy:

- \$10.7 million in value-added income in year 1 to over \$23.4 million by year 5 for the resort and St. Helena merchants and employees;
- 100 jobs on site, another eight jobs in St. Helena supported once the resort has hired to full capacity and occupancy is at 55.3 percent occupancy;
- Of the value-added income, \$5.6 million to \$12.2 million in wages are paid to workers at the resort and beyond in St. Helena from years 1 to 5;

- Tax revenues for the City of St. Helena range from \$3.02 million in year 1 to over \$4.48 million in year 5 based on room revenue, spending at the resort and throughout St. Helena:
 - \$208,000 to \$454,000 annually in additional property taxes over the five years beyond the resort's change in assessed value described above;
 - These amounts do not include resort improvements to the property's value;
 - \$38,500 to \$84,000 in new sales tax revenues over the first five years; and
 - Transient occupancy tax (TOT) revenues of \$1.42 million and growing to \$2.88 million per year over the five years as occupancy rates rise and the resort establishes its market, an average of \$2,568,900 per year at the estimated occupancy rate and ADR.

The growth of TOT revenues provides additional flexibility to the City of St. Helena in two ways. First, the extra revenues help increase the sources of funds available to city government directly (versus sales taxes or property taxes that are primarily for state, county, or other local uses). TOT revenues can act as collateral to finance borrowing for infrastructure and other needs that may support this project and pay the principal and interest payments. This resort provides jobs and revenues for city residents and businesses. The fiscal impact estimates show the resort generates an average of \$38,897 per year **per annual equivalent resident at the resort** for the City of St. Helena, over 10 times the estimated cost of one new resident of St. Helena.

Introduction

Economic impact studies consider how a construction project, a new or growing business, or an industry may affect a regional economy. A "region" could be a small city, state, country, or group of countries. For this project, we look at the effects of a new resort being built and operated at 2800 Main Street in St. Helena, California. Noble House Hotels and Resorts commissioned this report.

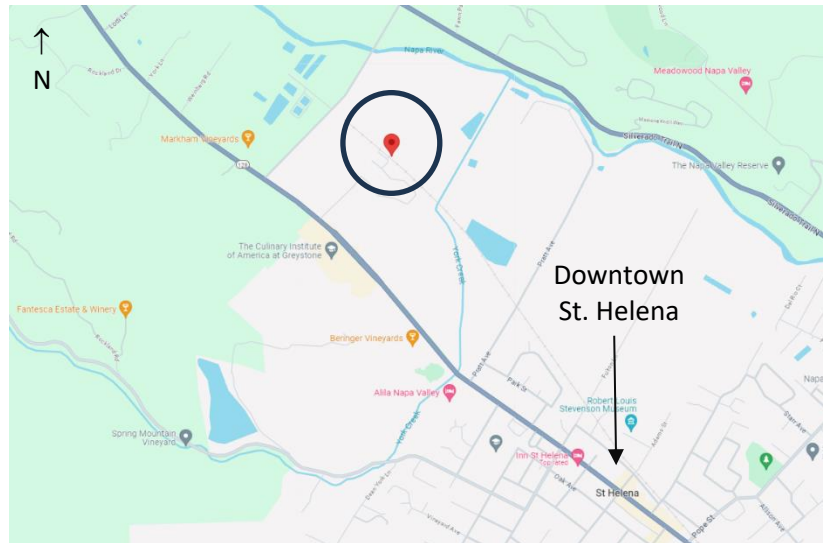
The economic impact estimates herein focus on the business revenues (and the portion that remains in St. Helena, later referred to as "value-add" incomes), wages, and jobs supported by the project's two phases: (1) construction and (2) operations. The construction phase provides income to St. Helena from workers' on-site spending their income within St. Helena's economy and the hard construction costs and administrative (soft) expenses, providing more revenues to local vendors and city government. Gains for the City of St. Helena (city government), except for property-tax gains due to the site's improvements after construction is completed, are also complete when construction ends. The operations phase has ongoing, annual economic and fiscal impacts. Workers on-site and visitors spending new to St. Helena from overnight stays at the resort drive daily economic gains due to operations. These gains become business revenues and value-added income after vendors are paid, wages are paid, and jobs are

supported within St. Helena. State and local tax revenues, including sales and transient occupancy tax (TOT) revenues, are derived from resort operations and subsequent “ripple” or multiplier effects. Because such gains are ongoing, annual changes are estimated, including costs to St. Helena to support the resort’s operations.

The resort’s fiscal impacts include fees paid to St. Helena’s city government, property tax changes due to resort property being an improvement to the land (continuing gains from the construction phase), and gains from property transactions due to the resort’s economic activity creating income for workers, vendors and city government related to resort operations. Our results include only state and local tax impacts, with estimates for St. Helena distinct from state or county-level gains.¹ We also consider ongoing municipal costs based on recent city budgets and new activity from this site. We start with an overview of the project, estimate assumptions, and report methodology. The economic and fiscal impact estimates are followed by a summary to conclude the report.

Project Overview

The project is known as St. Helena Resort as of March 2024. Noble House Hotels & Resorts is the developer. The property is planned for a specific portion of 2800 Main Street in St Helena, California (see map below). Access to the property would come from: (1) Deer Park Road, (2) from the Charles Krug Winery, and (3) from the Napa Valley Wine Train depot in St. Helena. The resort would be constructed adjacent to the northern terminus of the Wine Train’s rail tracks. The proposal plans to develop approximately 10 acres of unused ground on the Charles Krug winery property, including a one-acre landscape area. The current design is for 52 rooms with the ability to create 56 rooms within the same building footprint. These rooms are in a two-story estate house with 14 guest rooms and 38 guest rooms spread out across 17 one-story villa buildings, two villa buildings with two stories each, and two rail car guest rooms. Additional planned amenities include an organic culinary garden and olive tree grove, meeting



Source: Google Maps

¹ The resort has future plans to add 50 housing units for on-site workers and may include additional workers for other St. Helena businesses to increase the local workforce available for job openings. To remain conservative we do not add the construction or occupancy impacts of these units to our analysis.

and event spaces, swimming pools, and an on-site spa and restaurant. The final design ultimately dictates the actual project costs. The economic and fiscal impacts come from this project's two phases: construction and resort operations.

Construction Phase

Once ground is broken, approximately 15 to 18 months are needed to complete the construction. This analysis assumes construction expenses are split between hard and soft costs. Hard costs relate to on-site project work, including what goes in each room and office (fixtures, furniture, equipment, or FF&E). Soft costs are administrative, design, and legal costs. We remain conservative by recognizing only a subset of the total cost estimates, as some spending will occur outside St. Helena. We identify costs used in the final economic impact estimates by an asterisk (*) in the list below; not all the costs will be spent inside St. Helena. We include the entire contingency fund in our hard-cost estimates.

- Hard Costs of \$66.7 million over 16 months
 - Construction = \$58.2 million*
 - Fixtures, Furniture and Equipment (FF&E) = \$5.52 million
 - Other costs = \$2.93 million
- Soft Costs of \$15.53 million
 - Permits and Legal Costs = \$1.99 million*
 - Design = \$3.33 million
 - Project Management = \$1.0 million*
 - Developer fees = \$2.67 million*
 - Marketing for opening = \$4.0 million*
 - Other Costs = \$2.54 million
- Contingency costs for project = \$3.33 million*
- Financing Costs = \$9.09 million
- **Totals = \$103.76 million (as of March 2024)**
 - **Total assigned to St. Helena for economic impact analysis based on estimated spending in St. Helena:**
 - **\$61.5 million for hard costs (including contingency);**
 - **\$9.66 million for soft costs.**

The operations phase begins once construction is complete. Once operations begin, the resort welcomes guests and begins to generate income. We assume the two phases are sequential; within two months of construction ending, the operations phase begins.

Operations Phase

Based on current forecasts for resort revenues, costs, and hiring levels, we use years 1 to 5 of operations to estimate the resort's economic and fiscal impacts once visitors begin to stay overnight. The list below summarizes the assumptions used in the calculations.

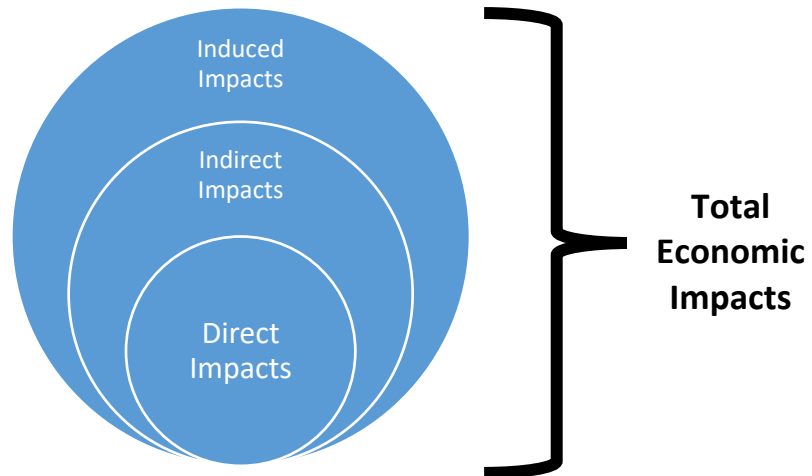
- Hiring will average 101 full-time equivalent (FTE) staff for years 1 to 5;
- The expected annual occupancy rates on average for years 1 to 5 is 55.3%;
 - The assumed range is between 32.5% in year 1 to 71.5% in year 5;
- The expected annual average daily room rate in current dollars is \$1,716 for years 1 to 5;
 - The assumed range is between \$1,849 in year 1 to \$1,700 in year 5;
- Number of available rooms = 52 (18,350 hotel nights added to the local/regional inventory);
- Estimated operational expenses as a percentage of hotel revenues = 68.3%
 - Operational expenses suggest potential vendor revenues derived from the resort for St. Helena businesses;
- Expected transient occupancy tax (TOT) revenues = \$2,568,900 per year, using 15% as the TOT rate (with 13% as the core rate for the City of St. Helena, as discussed below); and
- Year 1 is currently forecasted as 2027 to start operations.

The indirect and induced effects (the broader economic effects on the local economy, including additional taxable transactions) on St. Helena's city economy are based on the city's economic breadth and depth. As shown in the estimates below, the resort's hiring of workers, wages paid to these workers, vendor payments, and broader spending by overnight guests are critical ways this resort affects St. Helena's economy. These are the economic impacts.

Methodology

The levels of spending, wages, and revenues above help determine the starting point of “direct” economic impacts, as described below and estimated by the IMPLAN® model.²

Figure 1: Economic Impacts



Direct effects come from a business or a construction project generating revenue or costs and then paying vendors and workers as costs of operations. **Indirect** effects come from worker and vendor spending on various merchants, vendors, and employees, creating a second round of supported business revenues, jobs, wages, and tax revenues. This round of spending creates further **induced** effects. As affected employees and businesses spend on purchasing or producing goods and services within St. Helena’s city limits (where taxable sales (including hotel stays that generate transient occupancy tax or TOT revenues) for the city government would apply), business revenues rise for grocery stores, marketing and public relations, personal services, restaurants, accountants, carpenters, and various other industries.

Estimated fiscal impacts come from various transactions and affect federal, state, county, and city finances. We show state and local tax revenues only to focus on those sources of funds directly related to city government. Costs to the City of St. Helena would be partially offset by fees paid during construction and ongoing revenues. Our analysis below considers the construction period and then five (5) years of operations.

An essential aspect of economic impact studies is what is retained in the local economy from

² Please see <http://www.implan.com> for more information on IMPLAN® and also the “Economic Impact Estimation” section in this report.

each project phase and ongoing revenues, wages, and taxes. Value-added revenues are those gains “added” to the local economy and not leaked away based on purchases elsewhere from incomes made locally. As shown below, wages and salaries of workers on-site are vital expenses during both phases that provide income to local residents. By economic necessity or choice, it is essential to consider how many on-site workers would live in St. Helena versus some other place (such as Santa Rosa or the city of Napa). The breadth of the local economy, in terms of industry mix, helps retain local gains versus leaking away to other areas.

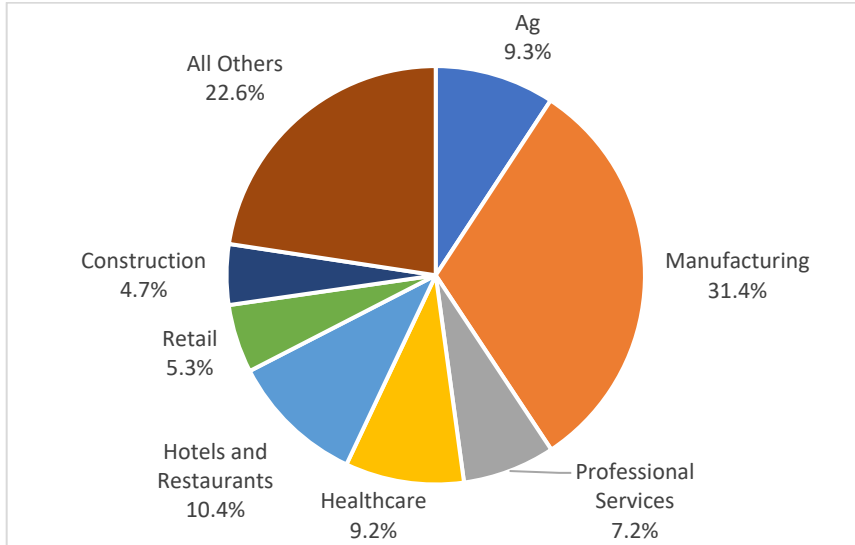
St. Helena as a City Economy

Northern Napa County employers are primarily in the wine industry (wineries and vineyards), restaurants, healthcare (St. Helena Hospital is a significant employer northeast of the city of St. Helena), and an array of professional services businesses (legal, accounting, architecture, etc.). In contrast to southern Napa Valley, “Up Valley” Napa County is more rural, with smaller towns (Calistoga, St. Helena, and Yountville). There are long-standing commute patterns into St. Helena from other places to work at St. Helena employers. Gains from the resort’s daily operations partially remain in St. Helena versus other parts of Napa County and beyond based on where spending is done and vendor relationships exist. From 2010 to 2021 (the latest official data available on commute patterns), employers in St. Helena hired between 87 and 90 percent of local workers outside St. Helena. The more workers are local, the more their spending is retained at local merchants (grocery, medical and dental services, etc.).³ In the estimates below, the indirect and induced gains from both project phases are small compared to the direct gains because St. Helena’s economy is minuscule compared to the surrounding area.

In 2022, the latest data available and estimated for cities in California by the Census Bureau, the following data provide some perspectives. Figure 2 shows the mix of employers by their industry’s proportion of total city employment for St. Helena. For the income generated by local businesses that remain in St. Helena (value-added income or gross city product, an analog to the national-level gross domestic product or GDP), Figure 3 shows the industry breadth in St. Helena. Notice that manufacturing, as related to the wine industry, dominates employment and value-added income in St. Helena. St. Helena employs approximately 6.75 percent of Napa County’s total employed workers.

³ See the Longitudinal Employment and Housing Database of the federal Census Bureau at <http://lehd.ces.census.gov> for more details and data.

Figure 2: St. Helena Industry Mix, Employment Levels, 2022, % of City Total

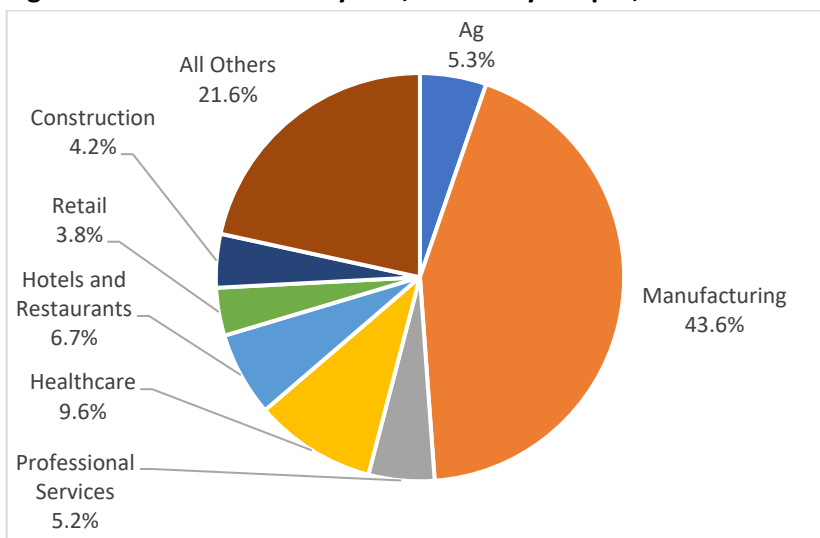


Sources: IMPLAN®, Census Bureau, and Author's Calculations

St. Helena's economic mix is essential to reducing "leakage" as more visitors come to town to enjoy this resort or as more jobs on site are offered. Leakages are lost business or government revenues in other areas because of local economic activity, creating gains for other areas where vendors or workers live.

The housing construction associated with the resort will provide additional economic benefits, which are not analyzed in this report. The resort's revenues are driven by visitors who stay overnight in St. Helena, a marketplace with voluminous regional competition.

Figure 3: St. Helena Industry Mix, Gross City Output, 2022 Dollars for 2022, % of City Total



Sources: IMPLAN®, Census Bureau, and Author's Calculations

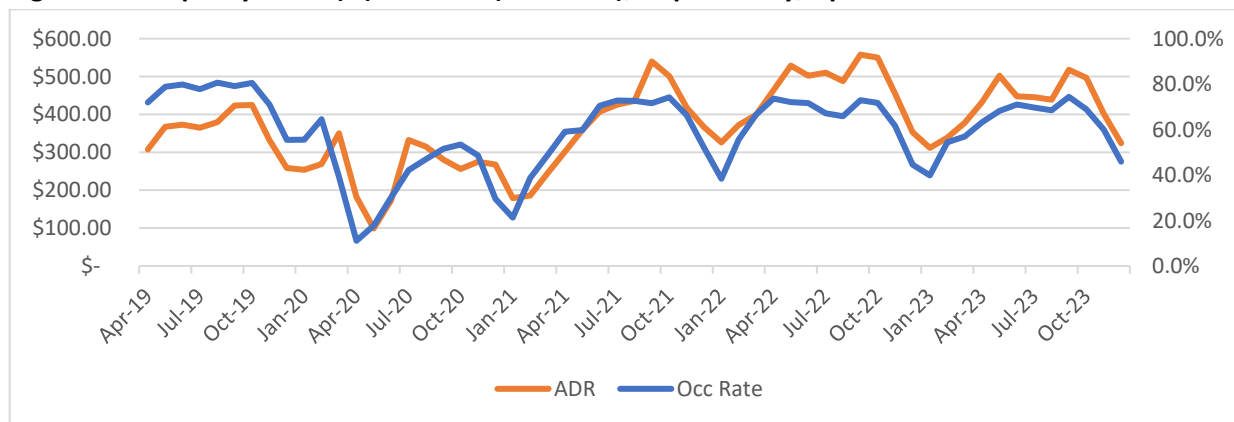
Recent Regional Performance of Overnight Stays: Napa County

Napa County has become synonymous with food and wine, and adults come to California for a European-style experience. St. Helena’s location is close to many wineries in northern Napa County, including some along the Silverado Trail. St. Helena is a small center of restaurants, wineries, and retailers with a market focus on visitors. Visitors may come from points worldwide or surrounding counties throughout northern California.

Recent data on the larger overnight-stay market in Napa County is shown in Figure 4 below. These properties are broad in breadth, from budget hotels (Motel 6) to luxury resorts (Stanly Ranch and Silverado) in Napa County. The data also show typical tourism seasonality when comparing Napa County, Sonoma County, and San Francisco. A primary indicator of market strength is the estimated occupancy rate of available rooms based on the current number of hotel properties. The average daily rate (ADR) is another indicator of demand; an increase in ADR, the price offered for a room by an overnight stay property on average every day, suggests that hotel demand is rising. The supply of hotel rooms evolves slowly across a region, so demand generally drives a regional market for overnight stays versus a significant change in the number of new rooms. When occupancy rates and ADR are multiplied, revenue per available room (RevPAR) is the basis for a city economy's transient occupancy tax (TOT) revenues.

Figures 4 and 5 show occupancy rates and ADRs for Napa, Sonoma, and San Francisco counties. As a central air travel hub, San Francisco (SFO) has acted as a regional portal for international and national visitors to the Bay Area and, ultimately, Napa County. Sonoma County Airport (STS) acts as another regional portal. In some cases, resort patrons will come by their transportation, from driving to being flown by private plane.

Figure 4: Occupancy Rates (%) and ADR (Current \$), Napa County, April 2019 to December 2023



Source: Smith Travel Research and Author’s Calculations

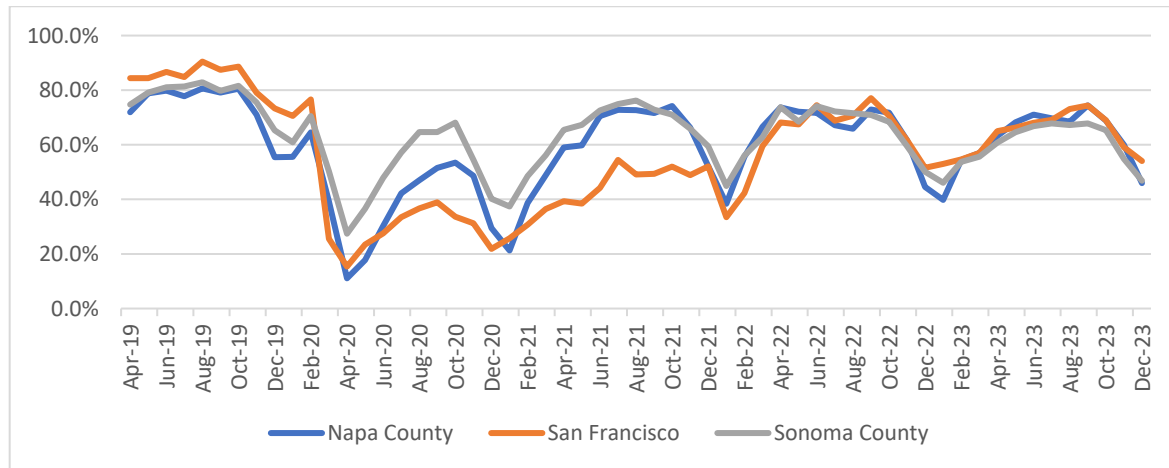
The volume of passengers and hotel choices in San Francisco create competition and

partnerships based on visitor desires. Notice, in all cases, the pandemic’s effects on these counties' markets. Dean Runyan Associates provides data for all 58 counties in California in terms of economic impact from travel based on their estimates of overnight stays and per-person spending when on vacation.

For St. Helena, the city economy is driven by local wineries, restaurants, retail, vineyards, and health care. As a small city in a rural county, St. Helena provides a job market for residents in northern Napa County or adjacent counties (Lake or Sonoma counties). Tourism data shows that staying in St. Helena overnight has been tracked with Napa County overall (see Figure 8). Traveling to St. Helena, especially from outside Napa County, means passing through either the city of Napa and points south within Napa County, Sonoma, or Marin counties.

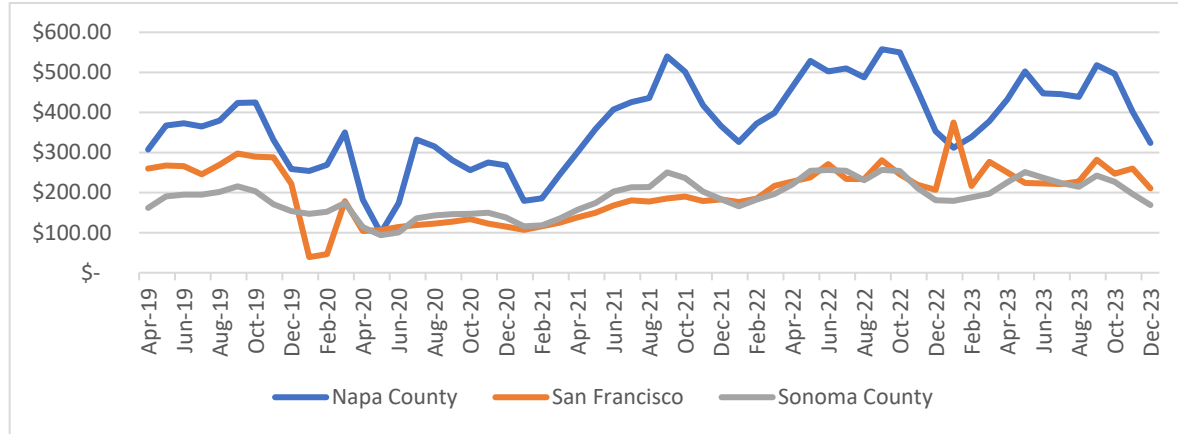
The resort provides another relatively large employer (101 employees would imply almost two percent more jobs in St. Helena once the resort is operational) and 10 percent more transient occupancy tax (TOT) revenues, as shown below. Sales tax and property tax revenue are additional tax gains from this resort’s construction and operations. A key component of how this resort affects a local economy is through additional transient occupancy tax (TOT) revenues. The overnight stay revenues of city hoteliers in Figure 8 generate TOT revenues.

Figure 5: Occupancy Rates, Napa County, Sonoma County, and San Francisco, April 2019 to December 2023



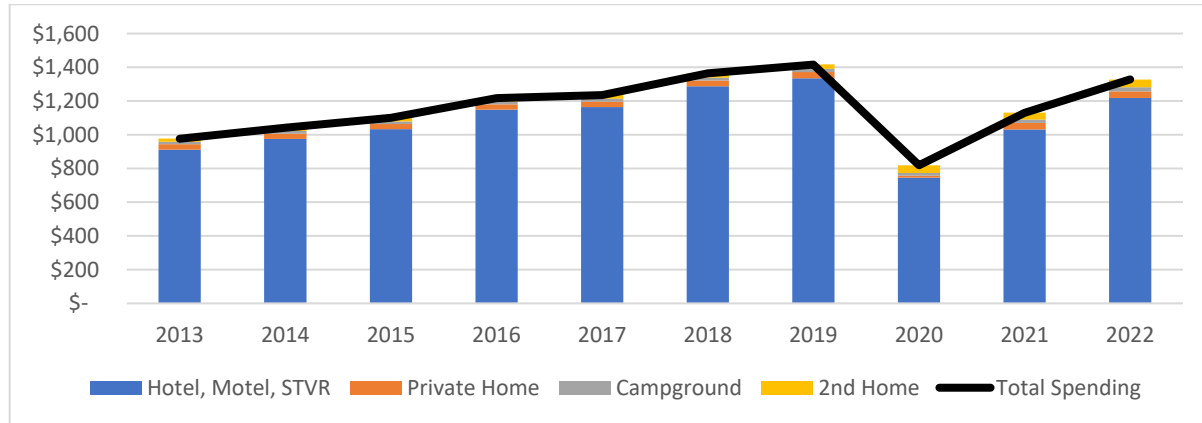
Source: Smith Travel Research and Author’s Calculations

Figure 6: Average Daily Rates, Napa County, Sonoma County, and San Francisco, April 2019 to December 2023



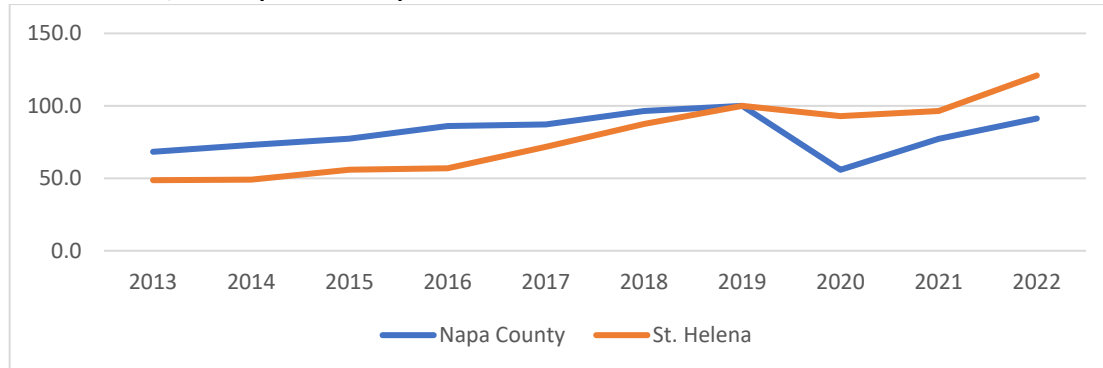
Source: Smith Travel Research and Author's Calculations

Figure 7: Traveler Data for Overnight Stay Spending in Napa County, 2013 to 2023 (est.), Current Dollars



Source: Dean Runyan Associates and Author's Calculations

Figure 8: Napa County and St. Helena Estimated Hotel Revenues in Current Dollars, 2013 to 2022, Index (2019 = 100)



Sources: City of St. Helena, Dean Runyan Associates, and author's calculations

Table 1 shows the progression of TOT tax revenues for St. Helena from fiscal year 2013-14 to 2022-23. Using the projected growth of TOT revenues to 2027, we show the estimated jump in TOT revenues when this resort starts operations. In Table 5, we consider how additional TOT revenues from this resort provide both borrowing capacity and the ability to pay off borrowing for the city in terms of new infrastructure or improvements.

**Table 1: Transient Occupancy Tax (TOT) Revenues, Various TOT Rates
St. Helena, Fiscal Years 2012-13 to 2022-23, Current Dollars**

Fiscal Year End	St. Helena TOT History
2013	\$1,610,039
2014	\$1,731,740
2015	\$1,848,419
2016	\$1,980,116
2017	\$2,212,455
2018	\$2,806,658
2019	\$3,296,741
2020	\$2,485,353
2021	\$3,762,794
2022	\$4,421,435
2023	\$4,066,538

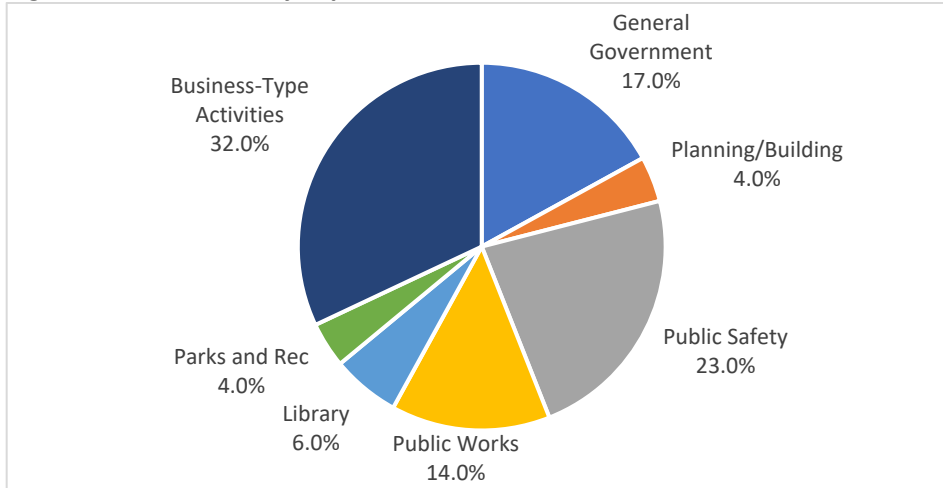
Source: City of St. Helena, Author's Calculations

St. Helena's Fiscal Budget: An Overview

Figure 9 shows the mix of significant city expenses in the 2019-20 fiscal year as a pre-pandemic benchmark compared to the latest fiscal year (2022-23) shown in Figure 10. These data are nominal and not inflation-adjusted. Notice the larger expenditures are for public safety (police and fire), public works (city infrastructure), and general government administration. There will be more expenditures toward public safety in 2022-23 as the budget expands with Measure E funds (from TOT) and sales tax revenues.

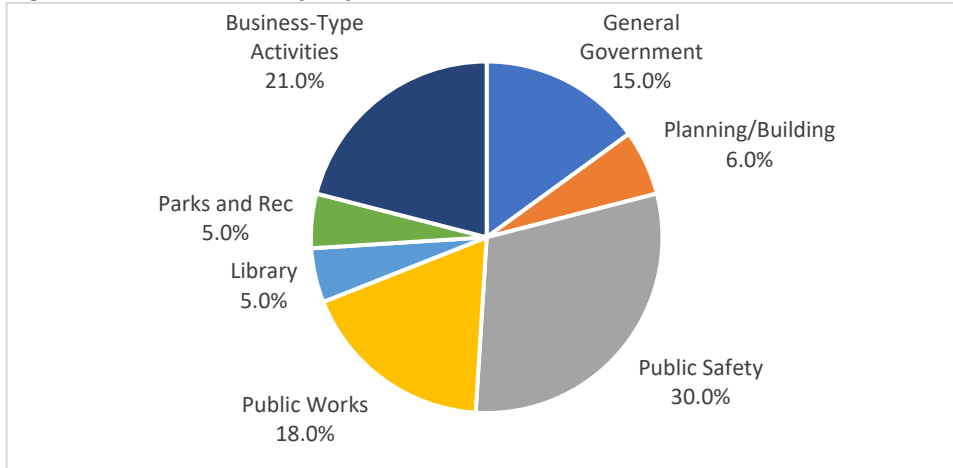
Based on St. Helena's population of 5,300 residents and recent budgets of approximately \$20,000,000, we estimate the average municipal cost for the City of St. Helena to be \$3,793 per resident or \$8,723 per household (occupied housing unit). At full capacity (the most liberal estimate and not the basis of the financial projections below), the resort would have 52 rooms year-round that were occupied by approximately 104 equivalent "residents" (2 people per room night sold).

Figure 9: St. Helena City Expenses, 2019-20, Current Dollars, % of Total



Source: City of St. Helena, Author's Calculations

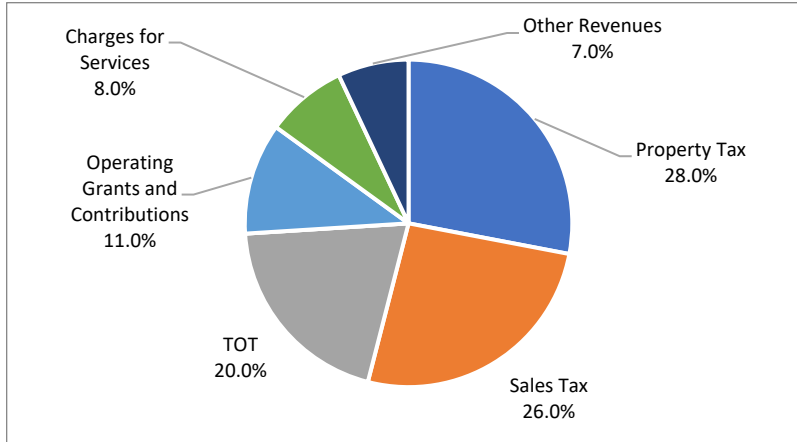
Figure 10: St. Helena City Expenses, 2022-23, Current Dollars, % of Total



Source: City of St. Helena, Author's Calculations

Figures 11 and 12 examine city revenue sources in fiscal years 2019-20 and 2022-23. St. Helena's revenues come primarily from sales and transient occupancy taxes (TOT), fees, intergovernmental transfers, and grants. Property taxes are the most significant revenue contributor in fiscal year 2022-23, but they are somewhat encumbered for local education and initiatives that involve parcel taxes. Sales taxes and TOT comprise approximately 46 percent of fund sources in the 2022-23 fiscal year.

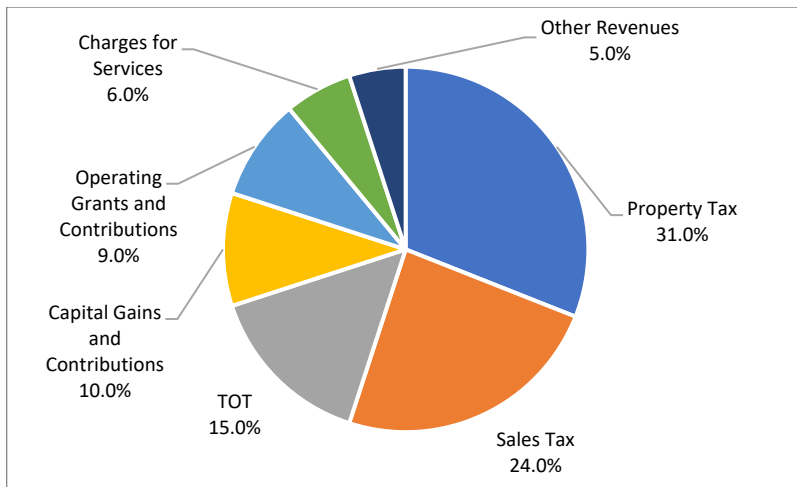
Figure 11: St. Helena Sources of Funds, Fiscal Year 2022-23



Source: City of St. Helena, Author's Calculations

In our fiscal impact estimates, we consider how daily employees and visitors to the resort may incur costs on the City of St. Helena as “new” to town. This is a conservative look at the cost of these additional people versus the current employment base or population to compare municipal costs to revenues generated by the resort’s operations.

Figure 12: St. Helena Sources of Funds, Fiscal Year 2019-20



Source: City of St. Helena, Author's Calculations

As we see in the economic impact estimates, during the construction and operations phases, the resort generates property tax, sales tax, and TOT revenues that augment the City of St. Helena's sources of funds. Some of those gains come from the broader spending impacts estimated from visitors coming to St. Helena and staying overnight that would not take place without this resort expanding the rooms and amenities in St. Helena to attract overnight visitors and create multiple days of visitor spending per room sold.

Economic Impact Estimates

Based on the above assumptions, the economic impacts on St. Helena are shown in Tables 2 and 3 in summary form. Each table shows the amount of spending that remains in St. Helena, known as “value-add” income. For the construction phase, a certain amount of local hiring and use of local vendors across all project spending creates localized gains. Table 2 provides the “ripple” effects based on the methodology described above for the construction phase. The data in Tables 2 and 3 can also be seen as an algorithm if the assumptions change. For example, every \$10 million in construction spending creates \$8.4 million in local income for workers and St. Helena businesses, supporting 70 full-time equivalent workers.

**Table 2: Construction Impacts
Incomes (Current Dollars) and Jobs (Number of Workers)**

	Hard Costs	Soft Costs
	Annual Average	Annual Average
	Construction Period	
Applicable Spending (Direct Impacts)	\$61,500,000	\$9,660,000
Value Added	\$51,662,200	\$5,402,400
Wages	\$20,845,000	\$2,790,500
Jobs	316.0	23.0
Indirect Impacts		
Value Added	\$398,100	\$259,800
Wages	\$162,400	\$136,300
Jobs	3	2
Induced Impacts		
Value Added	\$255,400	\$64,200
Wages	\$128,400	\$32,300
Jobs	2	1
Totals		
Value Added Income	\$52,315,700	\$5,726,400
Wages	\$21,135,800	\$2,959,100
Jobs	321.0	26.0

For operations, the first five years show rising demand for the resort as a place to stay overnight to long-term average levels. Operations cannot begin until the construction phase ends. A daily flow of overnight visitors to the resort increases spending in St. Helena. Such spending creates more demand for an array of vendors. Similarly to the construction impacts, Table 3 shows the effects of having visitors on property and in St. Helena daily and throughout

Economic Impact of St. Helena Resort

the year. The value-added incomes, including wages and vendor payments, are generated and kept in St. Helena for local businesses. Table 3 summarizes how revenues generated by resort operations have broader economic impacts in St. Helena.

Additional spending that comes to St. Helena due to visitors staying overnight becomes regional spending throughout Napa County. Vendors from the City of Napa, American Canyon, and other parts of Napa County indirectly gain income and job support from resort operations. In the next section, we consider the fiscal impacts on the City of St. Helena’s government and its sources of funds. Table 3 summarizes the estimated impacts of the first five years of resort operations.

**Table 3: Operations Impacts
Incomes (Current Dollars) and Jobs (Number of Workers)**

	Year				
	1	2	3	4	5
Resort Revenues	\$15,316,000	\$21,124,000	\$26,597,000	\$31,129,000	\$33,375,000
Value Add	\$10,749,800	\$14,826,300	\$18,667,600	\$21,848,500	\$23,424,900
Wages	\$5,636,000	\$7,773,300	\$9,787,200	\$11,454,900	\$12,281,400
Jobs	93	99	101	104	106
Indirect					
Value Add	\$125,700	\$173,400	\$218,400	\$255,600	\$274,000
Wages	\$75,600	\$104,300	\$131,300	\$153,700	\$164,800
Jobs	1.5	1.6	1.6	1.6	1.7
Induced					
Value Add	\$15,000	\$20,700	\$26,000	\$30,400	\$32,600
Wages	\$7,500	\$10,400	\$13,100	\$15,300	\$16,500
Jobs	0.1	0.1	0.1	0.1	0.1
Totals					
Value Add	\$10,890,500	\$15,020,400	\$18,912,000	\$22,134,500	\$23,731,500
Wages	\$5,719,100	\$7,888,000	\$9,931,600	\$11,623,900	\$12,462,700
Jobs	94.6	100.7	102.7	105.7	107.8

Fiscal Impact Estimates

Our estimations of fiscal impacts are a blend of the IMPLAN® model’s calculations based on the construction and operations spending and revenues, assumptions for the number of rooms sold annually, the resort’s operations revenues beyond rooms sold (hotel stays are just one part of revenue and taxable sales generated), and the City of St. Helena data on its sources and uses of funds as a municipal government based on its financial reports.⁴ Fiscal gains from the resort come from three primary sources for St. Helena:

- Sales tax revenues;
- Transient occupancy tax (TOT) revenues; and
- Property tax revenues.

Sales tax revenues come from the spending during the construction project at all levels based on taxable transactions. There may also be some use taxes, but sales taxes will be how the construction project provides retail tax revenues. The resort itself will have taxable transactions on-site. Enhanced spending within St. Helena, from retail sales to restaurant meals to local residents spending more at home because they work on-site, drives more sales and tax revenues. Every year, sales tax revenues start at zero; we assume the sales tax rate for the City of St. Helena is 8.25 percent, whereas the City of St. Helena retains 0.5 percent from the 8.25 percent or 6.06 percent of sales tax revenues generated within the city limits. For example, \$1 million of taxable sales in St. Helena would generate \$82,500 in sales tax revenue, of which \$5,000 (0.5 percent of the taxable sales amount) would go to the City of St. Helena.

Transient occupancy tax (TOT) revenues depend on overnight stays at the resort and what is paid for each room when occupied. To be conservative, we only estimate additional TOT revenues from the resort and not indirect effects on other properties or short-term rentals because of events supported by the property’s infrastructure. Some of that is captured as “Other Taxes and Fees” in Table 4. For example, corporate or other groups may have events centered on the resort, leading to additional hotel room demand beyond the resort.

TOT revenues depend on average daily rates (ADR) and occupancy rates; their product is revenue per available room or RevPAR. It is RevPAR that determines TOT. One difference between TOT and sales taxes is that the City of St. Helena keeps a more significant proportion of the TOT rate than sales taxes. The 15 percent TOT rate is 12 percent TOT for the City of St. Helena, 1% local Measure E (to help finance affordable and workforce housing efforts in the City of St. Helena), and 2% for the Napa Valley Tourism Improvement District (TID), providing

⁴ See <https://www.cityofstheleena.org/Archive.aspx?AMID=38> for several years of the City of St. Helena’s financial reports and city budgets.

Economic Impact of St. Helena Resort

financing for the Visit Napa Valley organization to promote and market the entire region to potential visitors. In our summary, only 13% of the TOT is counted in the city-level fiscal impacts, which are those that stay in St. Helena directly; we assume no changes over the five years of operational estimates here. Every year, TOT revenues also start at zero.

Property tax revenues come from transactions related to property workers and vendors affected by the resort's operations. Initial changes in property tax revenues for the City of St. Helena come from the property's construction and how the construction spending generates income gains and property transactions that provide an increase in the assessed value of properties in St. Helena. Once operations begin, annual incomes for workers and vendors related to the property allow real-estate transactions that augment property tax revenues each year. In our analysis below, we show those estimates. In contrast to sales and TOT revenues, property taxes, once augmented, remain in terms of an increase in the assessed property values in St. Helena.

This resident equivalent translates to an estimated municipal cost of roughly \$394,472 per year for the resort or \$3,792 per St. Helena resident. Our fiscal impact estimates show the resort generates approximately \$4,045,300 per year from the resort in years 1 to 5; this equates to an average revenue of \$38,897 per equivalent resident annually based on 104 equivalent residents in the 52 rooms at the resort for the City of St. Helena. This means the average per equivalent resident annual revenue is over 10 times the municipality's annual cost per resident. Table 4 provides the estimates as a blend of the estimates from the IMPLAN® model and the construction and operational outcomes assumptions regarding taxable transactions. We show employment and other taxes and fees that construction and subsequent operations would generate at the local and state levels. To be conservative, we show only local fees and other taxes related to the resort.

Table 4: Estimated State and Local Tax Revenues from Construction (Const) and Operations

	Const	Const	Operations	Operations	Operations	Operations	Operations
	Year 1	Year 2	1	2	3	4	5
Property Taxes (IMPLAN)	\$248,400	\$82,800	\$208,500	\$287,600	\$362,100	\$423,800	\$454,400
Property Taxes (Resort)	\$-	\$730,400	\$745,000	\$759,900	\$775,100	\$790,600	\$806,400
Sales Taxes (Resort)	\$-	\$-	\$321,600	\$497,500	\$690,900	\$802,400	\$848,200
Sales Taxes (IMPLAN)	\$179,100	\$59,700	\$38,500	\$53,100	\$66,900	\$78,300	\$84,000
TOT (Resort)	\$-	\$-	\$1,425,900	\$1,883,800	\$2,268,100	\$2,671,400	\$2,882,600
Subtotal	\$427,500	\$872,900	\$2,739,500	\$3,481,900	\$4,163,100	\$4,766,500	\$5,075,600
Employment Taxes	\$548,400	\$182,800	\$60,100	\$82,900	\$104,400	\$122,100	\$130,900
Other Taxes and Fees	\$540,700	\$180,200	\$506,700	\$698,900	\$880,000	\$1,029,900	\$1,104,200
Totals	\$1,516,600	\$1,235,900	\$3,306,400	\$4,263,700	\$5,147,500	\$5,918,500	\$6,310,700
Subtotal Per Hotel Room	\$-	\$-	\$52,700	\$67,000	\$80,100	\$91,700	\$97,600

Sources: IMPLAN®, City of St. Helena, Noble House Hotels and Resorts, Author's Calculations

Note: Property taxes are assumed to be 1.18% of the assessed value post-construction and increase by 2% per year over the years, as shown in Table 4. Additional TOT Revenues are estimated at 13% of room revenues. We assumed 52 rooms.

Borrowing Capacity from TOT

Based on TOT revenues increasing, the City of St. Helena can borrow up to four (4) times the income to finance an additional infrastructure or municipal support needed for this resort. By Operations Year 4, this property will have over \$10.0 million to the City of St. Helena’s borrowing capacity from TOT alone. Much like an enhanced infrastructure financing district (EIFD) does with property taxes, the additional TOT generated from this property could be used to pay for the principal and interest of infrastructure debt. The property’s existence acts as collateral for the TOT loan, where the projected revenues guide a lender on the ability to repay the loan. Table 5 shows the estimated change in TOT revenues as provided in Table 4 from 13 percent TOT and the amount of borrowing that could occur in years 1 to 5, with loan payments after year 5.

Table 5: Borrowing Capacity from Additional TOT Revenues from Resort Operations

City Borrowing Using Additional TOT	Operations	Operations	Operations	Operations	Operations
	Year 1	Year 2	Year 3	Year 4	Year 5
TOT (resort operations)	\$1,425,900	\$1,883,800	\$2,268,100	\$2,671,400	\$2,882,600
Borrowing Capacity	\$5,703,500	\$7,535,100	\$9,072,400	\$10,685,700	\$11,530,400

Sources: Author’s Calculations using Table 4’s Data

Conclusions

The economic effects of this resort’s two phases, construction and operations, provide the City of St. Helena with increased tax revenues from additional economic activity. The construction phase starts with workers coming to the site and spending income at St. Helena’s merchants. The project spending creates an enhanced value for the current property. The hard construction costs create those gains as the resort comes to life. After 15 to 18 months of building, the economic effects of construction end, except for the augmented property tax revenues. Those include new transactions due to workers in St. Helena being paid for the project and the property improvements.

Operations bring overnight visitors to St. Helena, which means more revenue for local businesses daily. We estimate approximately 101 workers on the property by year 5 of operations. Some of these workers will be housed in St. Helena. The visitor spending on and off property creates more income for those workers and more taxable transactions, including transient occupancy tax (TOT) revenues. Property and sales taxes are also increased based on the daily operations and broader economic activity throughout the city economy. Table 6 summarizes both phases' economic and fiscal impacts through year 5 of operations. The resort is estimated to generate revenue for the City of St. Helena 10 times the estimated cost.

Table 6: Total Economic Impacts, Current Dollars (Value-Added Income, Wages and Taxes) and Full-Time Equivalent Workers (Jobs)

	Construction	Construction	Operations	Operations	Operations	Operations	Operations
Year	1	2	1	2	3	4	5
Value Added Income	\$43,531,575	\$1,594,975	\$15,456,700	\$21,318,100	\$26,841,400	\$31,415,000	\$33,681,600
Jobs	344	115	95	101	103	106	108
Wages	\$18,071,175	\$812,475	\$5,719,100	\$7,888,000	\$9,931,600	\$11,623,900	\$12,462,700
Tax Revenues*	\$427,500	\$872,900	\$2,739,500	\$3,481,900	\$4,163,100	\$4,766,500	\$5,075,600
Sales	\$179,100	\$59,700	\$360,100	\$550,600	\$757,800	\$880,700	\$932,200
TOT	\$-	\$-	\$1,425,900	\$1,883,800	\$2,268,100	\$2,671,400	\$2,882,600
Property	\$248,400	\$813,200	\$953,500	\$1,047,500	\$1,137,200	\$1,214,400	\$1,260,800
Per new Resident**			\$26,341	\$33,480	\$40,030	\$45,832	\$48,804
Per new Household**			\$52,683	\$66,960	\$80,060	\$91,663	\$97,608

* These estimates of tax revenues are specific to St. Helena’s portion of Table 4’s estimates (“Subtotal”)

** We assume 104 equivalent residents and 52 resort rooms/household equivalents over years 1 to 5.

About Economic Forensics and Analytics, Inc. (EFA)

Economic Forensics and Analytics, Inc. (EFA) is an independent research and consulting firm located in Sonoma County, California. Since 2000, EFA has provided clients with customized economic analysis at reasonable costs compared to competitors. We have a wide range of clientele in the private and public sectors across the United States and Canada. For government and businesses alike, EFA provides economic forecasting and economic impact analysis using the latest data and a proven method of describing the effects of decisions. EFA president Robert Eyler has a doctorate in economics from the University of California at Davis. See more at www.econforensics.com.

Appendix: Table A-1: Industry Detail for St. Helena

Industry in St. Helena	Employment	Gross Regional Product (GRP)
Agriculture	465	\$35,561,800
Natural Resources	21	\$2,656,900
Utilities	5	\$4,195,700
Construction	235	\$28,687,600
Food and Beverage Manu	1,433	\$274,462,100
Light Manu	58	\$8,105,900
Heavy/Advanced Manufacturing	90	\$12,233,100
Wholesale	92	\$28,130,600
Store Retail	152	\$17,360,100
Non-Store Retail	114	\$8,324,000
Transportation	12	\$549,600
Logistics/Warehousing	20	\$1,906,700
Information	1	\$476,600
Financial Services	93	\$17,186,400
Real Estate	258	\$28,535,000
Professional Services	360	\$35,313,300
Management Offices and Consulting	76	\$11,017,400
Admin and Waste and Security	96	\$5,059,800
Private Education	13	\$638,500
Healthcare and Non-Profit Health	462	\$65,238,200
Events, Entertainment and Fitness	75	\$8,011,800
Hotels and Restaurants	524	\$45,056,900
Other Personal Services	194	\$15,423,400
Government	180	\$21,583,300
Estimated Totals	5,029	\$675,714,700

Sources: IMPLAN® and EFA

Appendix E. Peer Review Reports

- 1. Air Quality & Greenhouse Gas Emissions**
- 2. Biological Resources**
- 3. Historic Resources**
- 4. Archaeological Resources (CONFIDENTIAL/NOT ATTACHED)**
- 5. Noise**
- 6. Transportation**
- 7. Water/Groundwater**



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REVIEW

Date: May 30, 2024

To: **Maya DeRosa**
Community Development Director
City of St. Helena
1088 College Avenue
St. Helena, CA 94574

Cc Linda Ruffing
North Coast Community Planning
707.272.2343
linda@nccplanning.com

From: James A. Reyff
Illingworth & Rodkin, Inc.
429 E. Cotati Ave
Cotati, CA 94931
jreyff@illingworthrodkin.com

RE: **St. Helena Agritourism**

SUBJECT: **Peer Review of St. Helena Resort Project Environmental Assessment Report**
Job#24-067

Illingworth & Rodkin, Inc. (I&R) peer reviewed the air quality and greenhouse gas (GHG) sections of the St. Helena Resort Project Environmental Assessment Report. The results of our review are described below.

Project Understanding Related to Air Quality and GHG

An Environmental Assessment Report was prepared to provide an analysis of the Agritourism Initiative's potential impacts upon the community and environment. The Agritourism Initiative would amend the City of St. Helena's General Plan and Zoning Ordinance to establish the Winery and Planned Agritourism Overlay (WPA Overlay), which can only be applied on up to 11 acres of large parcels in excess of 110 acres located within city limits but outside of the City's Urban Limit Line (ULL) with existing active agriculture and a winery and served by an existing railroad line. Specifically, the WPA Overlay would be applied to a certain property to facilitate the development of up to a 56-room maximum world-class resort (proposed project) on the property known as the Charles Krug Winery (winery) located at 2800 Main Street in the City of St. Helena. We

understand the air quality and GHG analyses that we reviewed addressed development of only the project at 2800 Main Street.

The proposed project would consist of up to 36 villas; six second-floor villa units; four estate house suites; one estate house junior suite; seven estate house rooms; and two guest rooms in refurbished, historic train cars facing the Napa Valley Wine Train tracks that bisect the larger winery property. A variety of public and visitor-serving amenities are also proposed as part of the resort project, from an organic culinary garden and olive tree grove to meeting and event spaces, swimming pools, and an on-site spa and restaurant. The Agritourism Initiative also includes 92 specific Environmental Design Features (EDFs) that address potential environmental issues, including aesthetics, air quality, biological resources, cultural and historic resources, energy efficiency, flooding, geology, contamination, noise, public services, traffic, utilities, water, water quality, and wastewater.

Construction of the proposed project is anticipated to start January 2026 and would be completed over the course of 18 months. An estimated 16,700 cubic yards (CY) of import soil would be required to meet the site grading scheme.

Summary of Air Quality Findings in the Environmental Assessment Report

The air quality analysis indicates that the construction emissions from all construction activities would be below the recommended thresholds of significance for reactive organic gases (ROG), nitrogen oxides (NO_x), and exhaust particulate matter 10 micrometers or less in diameter (PM₁₀) and 2.5 micrometers or less in diameter (PM_{2.5}). However, to further reduce any potential construction emission impacts, the Agritourism Initiative would require development to implement EDF 15, which includes restrictions on construction vehicle idling, requiring various fugitive dust control measures, and conforming to applicable required State and federal emission standards for construction equipment.

Operational emissions would include area, energy, and mobile sources. Operation of the proposed project would be well under the Bay Area Air Quality Management District's (BAAQMD's) daily threshold for operation emissions. The Agritourism Initiative would require development to implement EDF 16, which would incorporate various sustainable design elements and guidelines to promote energy efficiency and other conservation measures.

The air quality analysis found less-than-significant impacts with respect to localized carbon monoxide concentrations or health risks. No odor analysis was provided.

Summary of GHG Findings in the Environmental Assessment Report

The proposed project would generate approximately 699 metric tons of carbon dioxide equivalents (MT CO₂e) during construction. During operations, the proposed project would generate approximately 1,693.3 MT CO₂e per year after the inclusion of 23.3 MT CO₂e per year from project construction. There are no quantified thresholds used to judge the significance of these emissions. In an effort to reduce GHG emissions, the proposed project has been designed to be all electric and energy efficient. The assessment finds that the Vehicle Miles Traveled (VMT) in the region would unlikely change as a result of the proposed project.

The Agritourism Initiative includes two EDFs related to air quality and two EDFs related to energy

which would indirectly reduce the effects of GHGs. Note that most emissions are the result of traffic, followed by energy use.

Summary of Traffic Findings in the Environmental Assessment Report Related to Air Quality

The proposed project is expected to generate an average of 576 trips per weekday including adjustments for internalization. Weekend daily trips were not provided. Based on the location and characteristics of the proposed project, the total VMT in the region would be unlikely to change as a result of the proposed project and, in fact, could reduce slightly if future guests are comprised of people who were already intending to visit the area. Additionally, employee VMT is not considered significant. However, to further reduce employee VMT and support the City's trip reduction and climate policies, Transportation Demand Measures (TDM) were recommended. These may include carpool incentives, active transportation incentives, subsidized transit passes, guaranteed ride home, bicycle trip-end facilities, and a designated transportation coordinator. Required EDF 66 includes TDM measures that would be included, such as rideshare/carpool/vanpool promotion and support; education and information on alternative transportation modes, including railway; and a designated TDM coordinator.

Air Quality Peer Review

The air quality analysis was mostly based on use of the CalEEMod recommended by BAAQMD in their latest CEQA Air Quality Guidelines. This is the appropriate model to use for this type of land use. The primary inputs to the model included:

- Hotel with 56.0 rooms and 99,606 sf of floor space on 257,492 sf landscaped area on 7.26 acres
- Quality Restaurant with 5.39 thousand sf on 0 acres (assumed to be covered in the Hotel acreage) Note traffic study describes restaurant as having 150 seats.
- Parking lot with 141 thousand sf on 3.24 acres

The CalEEMod construction modeling was appropriately based on default conditions, given that construction details are not available. It appears that emissions associated with the hauling of 16,700 CY of import material were not included. However, this would add only a small amount of emissions that would not affect the results of the analysis that found emissions to be less than significant.

We identified two minor issues with the CalEEMod operational modeling:

Page 68 of the Environmental Assessment states that the “project would be all electric design,” however, the CalEEMod modeling provided in Appendix C (26/50) shows 192 metric tons are associated with natural gas usage. If the project is committed to “all electric” with no natural gas infrastructure, then this is simply a slight overestimate in project emissions. Otherwise, this influences the findings for GHG, discussed below.

The modeling used the traffic study for mobile emissions, with daily trip generation as input represent all days of the week. The traffic study only provided weekday average daily trips but predicted peak hour trips for both weekday and weekend. Weekend peak-hour trips were much greater than weekday. For this reason, the operational traffic emissions

may be slightly underestimated if weekend daily trip generation is greater. This should be checked, however, the effect one way or another would not alter the conclusions.

The analysis did not include a quantified health risk assessment and we would agree that one is not necessary for the following reasons:

- Sensitive receptors are located at least 200 feet from most construction.
- EDF 15 will require diesel-powered construction equipment be equipped with the most effective Verified Diesel Emission Control Strategies (VDECS) available for the engine type.

Based on reduced emissions through implementation of EDF 15 and the separation distance, construction emissions should not lead to significant health risks.

The air quality study did not address odors. It appears the project would include on-site wastewater treatment and reuse of reclaimed wastewater (page 83 of the Environmental Assessment). There is no description of this treatment equipment or process. This potential source of odors should be identified and assessed in the air quality analysis. We do not anticipate the odor assessment to lead to any significant impacts.

Greenhouse Gas Emissions

The prediction of GHG emissions was based on CalEEMod modeling. Comments regarding natural gas use and traffic inputs apply to this portion of the assessment. The Environmental Assessment uses the latest project GHG thresholds recommended in the 2022 BAAQMD CEQA Air Quality Guidelines, which are qualitative in general. Therefore, the prediction of GHG emissions is not a factor in assessing the significance of the project emissions.

Since St. Helena does not have a current GHG reduction plan that addresses future GHG reduction goals, the assessment GHG emissions is based on evaluation of design elements in Criterion A of BAAQMD's 2022 GHG Significance thresholds¹. There are three issues to be aware of:

1. All electric design. To meet BAAQMD thresholds, the *project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development)*. As discussed above, the CalEEMod modeling indicates natural gas usage. The City should obtain assurances that the project will not include natural gas appliances or plumbing.
2. VMT impact. BAAQMD thresholds require that a *project will achieve a reduction in project-generated vehicle miles traveled (VMT) below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted Senate Bill 743 VMT target that reflects the recommendations provided in the Governor's Office of Planning and Research's Technical Advisory*. Projects that are exempt from the VMT analysis generally meet this requirement. It appears that no such VMT analysis has been conducted to demonstrate that the VMT requirement is exempt or is below the BAAQMD/SB 743 target.

¹ Defined by BAAQMD as a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b)

3. EV Parking. The BAAQMD GHG thresholds require that projects *achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2*. The Environmental Assessment, without any explanation, states that *the proposed project is only required to comply with CALGreen's mandatory level of EV charging infrastructure. Therefore, the proposed project would not be consistent with this element*. The City will have to impose appropriate EV charging requirements upon the Project that are consistent with CALGreen Tier 2 to make a less-than-significant finding for this impact.

Appendix E - Peer Review Reports
2. Biological Resources



June 3, 2024

Attn: Maya DeRosa

City of St. Helena
1088 College Avenue
St. Helena, CA 94574
MDeRosa@cityofstheleena.org

Subject: Peer review of Biological Resources assessment - St. Helena Resort Project, St. Helena, California

Ms. DeRosa:

This letter provides a peer review by WRA, Inc. (WRA) of the Biological Resources portion (section 6.2.3) of the Environmental Assessment Report (EAR) for the St. Helena Resort Project, by First Carbon Solutions (2024). The proposed project (Project) is a hotel and resort on the greater Charles Krug Winery property located at 2800 Main Street (APN 009-010-022-000) in the City of St. Helena (City), Napa County, California. The context of the EAR includes the St. Helena Agritourism Initiative, a voter-sponsored initiative that if approved would amend the City's General Plan and Zoning Ordinance to allow for winery-related development on certain larger, outlying parcels (greater than 110 acres) within the City's limits that meet other specific criteria. The EAR also includes Environmental Design Features (EDFs) from the Agritourism Initiative that are designed to address potential environmental issues, including related to biological resources; specific EDFs are also referenced herein when warranted.

No dedicated field work (site visit) occurred in support of this peer review. The information provided herein is based on the materials provided, publicly available information, and WRA's professional biological resources experience; the latter includes many vineyard and winery-related projects in Napa County.

AUTHOR QUALIFICATIONS

I (Jason Yakich; author) have over 16 years of biological consulting experience performing general biological assessments, wildlife habitat assessments, breeding bird and other avian surveys, and protocol-level surveys for several special-status wildlife species. I have prepared and overseen a variety of general biological and technical reports with a geographic focus on the North Bay counties and North Coast. This includes over 45 vineyard and/or winery-related projects in Napa County since 2017 (many ongoing). I received a Bachelor of Arts in Biology from U.C. Santa Cruz and a Master of Science in Biology from San Francisco State University.

PROJECT DESCRIPTION

The Project involves development of hotel and resort facility within up to 11 acres within the central-western portion of the greater 140-acre Charles Krug Winery property (Project Area). The

facility would include an estate house, up to 54 guest rooms within several single- and two-story villas, two guest rooms located in historic train cars, and various other amenities (some public) including but not limited to an on-site spa, restaurant, culinary garden, and a vineyard. The Project Area mostly consists of open, disturbed (fallow) land with a gravel substrate and/or ruderal (disturbance-oriented) vegetation.

PEER REVIEW

Overall, the biological resources portion of the EAR is adequate in its presentation of the Project Area and its environs. The Project Area has a history of disturbance and modification and was at least partially dedicated to agriculture by 1940 (Napa County 2024). More recent uses (since 1993) include vineyards (and possibly other crop production) and vehicle/equipment staging and storage (Google Earth 2024, Napa County 2024). The Project Area has been graded and/or otherwise disturbed multiple times, with the bulk of its area hosting a gravel (artificial) substrate or otherwise subject to substrate and vegetation maintenance. This history of modification precludes the potential for sensitive vegetation communities and special-status plants to occur on-site.

Adjacent land covers are also disturbed and modified, and include vineyard blocks, roads, and the Charles Krug Winery facility to the east and southeast. Several coast live oak (*Quercus agrifolia*) trees are present along the northeastern boundary of the Project Area, and oaks and other trees are present along a linear drainage ditch on the northwestern boundary along Deer Park Road.

Aquatic Resources

Sensitive aquatic resources are those protected by one or more federal, state, and/or local regulations; common aquatic features subject to such protections include streams and wetlands (including seasonal wetlands). A review of existing aerial photography indicates that no stream is present within or adjacent to the Project Area (though see references to streams within the greater property below).

The EAR does reference a “potential wetland...within ruderal vegetation toward the northern end of the site” (p. 56) but provides no mapping and few details, other than the observation of standing water and some associated facultative plant species (those likely to occur in wetlands) during a site visit in the month of February. Based on a review of aerial photography, no clear signature of a potential wetland is consistently visible (over multiple years), so the specific location of the subject feature is uncertain. The EAR concludes that a formal wetland delineation should be performed within the Project Area to determine if any features potentially jurisdictional to the U.S. Army Corps of Engineers (Corps) and/or state Regional Water Quality Control Board (RWQCB) are present. If any such features would be necessarily impacted to accommodate the Project, regulatory permits would be needed from the Corps and/or RWQCB, ultimately dependent on the jurisdictional assessment of the subject feature(s) in accordance with EDF 31 (Wetlands and Waters).¹ WRA concurs with the EAR regarding the need for an aquatic resources delineation, and stresses that the delineation should consider the history of

¹ Note that a jurisdictional determination would be ultimately provided by the Corps and/or RWQCB.



modification in the Project Area and how this may affect a jurisdictional determination if any potential wetland features are present.²

The EAR also states that “the adjacent drainage ditches appear to have a direct hydrological connection to the Napa River” (p. 56). As per aerial photography, a linear drainage ditch is present along the northwestern boundary of the Project Area adjacent to Deer Park Road, and hydrologically connected to a ditch along Highway 128 (Main Street). Aerial photography suggests that the subject ditch connects directly to (drains into) the Napa River, approximately 0.24 mile to the northeast of the Project Area, though the ditch’s alignment is partially obscured by trees/vegetation and thus this connectivity is speculative. The ditch, including the section adjacent to the Project Area, also hosts associated oaks and other trees and shrubbery, which has increased in extent and density since at least 1993 (Google Earth 2024). If involved in Project review, the California Department of Fish and Wildlife (CDFW) could claim regulatory authority over the vegetation along the ditch if the subject vegetation is classified as “riparian.”

The Napa River is Waters of the U.S. and State and thus jurisdictional to the Corps and RWQCB, as well as to CDFW. The EAR notes that the ditch in question may be subject to indirect and temporary impacts during construction, which could impact the Napa River (e.g., sediment discharges during construction), and references EDF 31 as the means to address such impacts. WRA recommends assessing the ditch system and its associated vegetation as a component of the aquatic resources delineation, including how to best preclude any adverse impacts if such is relevant. Note that as described in the EAR and shown in visual renderings, the Project will avoid the ditch system; the renderings also suggest that associated trees/vegetation along the ditch will be left intact. WRA recommends complete avoidance of the ditch and its immediate vicinity via the largest feasible setback, which would likely preclude involvement of the Corps and RWQCB as regards the ditch. Avoidance should also be clearly specified in the final description and plans for the Project. The Project will also presumably require a SWPPP as part of its grading authorization, providing additional measures and monitoring to ensure that incidental impacts to the ditch are avoided; these measures should also be specified in the final project description.

Also discussed in the EAR is York Creek, a tributary to the Napa River present along the southern boundary of a portion of the greater Krug Winery property. Along the Napa River, York Creek supports a run of federal listed steelhead (*Oncorhynchus mykiss irideus*; central California coast ESU [evolutionary significant unit]; CDFW 2024, other sources) and is otherwise considered sensitive. York Creek is located approximately 1,090 feet (0.2 mile) from the Project Area at its closest point, a setback more than sufficient to preclude both construction and operational impacts to the creek. The Project will also rely on water withdrawal from wells located within the greater winery property, but as per the EAR all such wells will be greater than 500 feet from both the Napa River and York Creek, which will avoid impacts to the hydrology and aquatic habitat of both streams. While assessing this conclusion is beyond the scope of this peer review, EDF 80 requires preparation of a groundwater report by a qualified hydrologist prior to issuance of a grading permit. The groundwater report and analysis should address the use of on-site wells and how such may affect the hydrology of York Creek and the Napa River, providing

² It is WRA’s understanding that no wetland mitigation banks currently service Napa County. As such if compensatory mitigation for wetland loss is needed (via the regulatory permitting process), the creation and/or enhancement of wetland acreage in the vicinity of the Project Area would likely be required.

measures to ensure that no adverse impacts to the hydrology of these streams occurs as a result of the Project.

Special-status Species

Plants

As outlined above, the Project Area has been used for agricultural and other purposes and subject to disturbance for decades. Although special-status plants are not referenced in the EAR, the disturbed nature of the Project indicates that such species are highly unlikely or have no potential to occur there or otherwise be impacted by the Project.

Wildlife

The disturbed conditions (including on surrounding lands) and resulting lack of suitable habitats also greatly limit the potential for special-status wildlife to occur within the Project Area. The EAR references two special-status wildlife species (pp. 56-57): 1) white-tailed kite (*Elanus leucurus*; state Fully Protected Species), assessed as having potential to nest in trees within or adjacent to the Project Area; and 2) Townsend's big-eared bat (*Corynorhinus townsendii*; state Species of Special Concern), which may roost within the trees. The EAR references EDF 20s (Nesting Birds) and 21 (Roosting Bats), respectively, to address any potential impacts to these species. WRA agrees with both the assessment regarding white-tailed kite and the suitability of EDF 20 to address this species. Townsend's big-eared bat, however, roosts in caves, mines or secluded portions of buildings (also those abandoned or otherwise underutilized) and is unlikely to use the subject trees for roosting.³ Other bat species do have some potential to roost in the trees if suitable cavities/hollows are present, including pallid bat (*Antrozous pallidus*; state Species of Special Concern) as well as some non-status species. While EDF 21 is nonetheless generally suitable to avoid or otherwise minimize any potential impacts to bat roosts (if such are present), the stipulated default buffer of 500 feet is larger than what is typically recommended in such situations (e.g., CEQA mitigation measures). WRA recommends that EDF 21 be revised as follows:

Bats, including pallid bats: If feasible, vegetation (including tree) removal and/or construction initiation shall be conducted between September 1 and March 31. If vegetation removal and/or construction activities is to occur during the general maternity roosting season (April 1 through August 31), a qualified biologist shall conduct a habitat assessment and preconstruction survey (if needed) of trees within and adjacent to the Project Area no more than seven days before vegetation removal or construction activities begin. If no suitable roosting habitat for bats is found, then no further study is warranted. If an active bat roost is found, a non-disturbance buffer with a 150-foot radius shall be established around the roost unless a smaller buffer zone is approved by CDFW. Construction may resume once the maternity roost is no longer active or as approved by the qualified biologist. If the roost of a special-status species is to be necessarily removed or otherwise impacted, coordination with CDFW shall occur. Irrespective of time of year, all felled trees with potential bat roosts should remain on the ground for at least 24 hours prior to chipping, off-site removal, or other processing to allow any bats present within the felled trees to escape.

³ EDF 21 itself mentions pallid bat, so perhaps this was the intended species to include in the EAR text.



Additionally, while other special-status wildlife species are unlikely to occur within or adjacent to the Project Area, a summary table outlining which habitat elements are absent or other factors specific to each species known from the vicinity should be created. Such tables are typical of full California Environmental Quality Act (CEQA) documents for projects of this scale, even for highly disturbed sites.

Bird Nesting – General

As implied in the EIR, native bird species with baseline legal protections under the federal Migratory Bird Treaty Act and California Fish and Game Code have the potential to nest within or adjacent to the Project Area. Primary nesting substrates would be in trees and larger shrubs, though nesting on the ground or low in ruderal vegetation cannot be ruled out if the site is left generally undisturbed. WRA recommends that EDF 20 be revised as follows:

Birds, including but not limited to raptors such as white-tailed kite: If feasible, vegetation removal and/or construction shall be conducted between September 1 and January 31. If vegetation removal and/or construction activities is to occur during the nesting season (February 1 through August 31), a qualified biologist shall conduct a preconstruction survey no more than seven days before vegetation removal or construction activities begin. If an active nest (one with eggs or young) is found, a non-disturbance buffer shall be established around the nest and remain in place so long as the nest is active. Buffers will have a minimum radius of 500 feet for raptors and special-status species, and 150 feet for other birds. Buffers may be reduced in size if on-site observations by the biologist indicate that the reduction will not result in impacts to the nest or breeding success. Buffers may be removed once all young birds have left the nest or as approved by the qualified biologist.

SUMMARY

The Biological Resources section (6.2.3) of the EAR provides generally sufficient documentation of conditions at the Project Area and potential biological resources constraints for the Project. The following summarizes WRA's peer review, including recommendations.

Aquatic Resources

- An aquatic resources delineation of the Project Area should be performed, including the jurisdictional status (federal and state) of any potential wetland features present. Regulatory authorizations for any necessary impacts to aquatic features should be obtained from the Corps and/or RWQCB (as warranted), in accordance with EDF 31.
- The Project should completely avoid the drainage ditch (including directly associated vegetation) along Deer Park Road, and clearly state and demonstrate this avoidance in project descriptions and plans.
- Current plans show that York Creek (on the eastern boundary of the greater Krug Winery property) is being sufficiently avoided by the Project. The hydrology study required by EDF 80 should include an assessment of on-site well use in the context of avoiding any adverse hydrological impacts to the York Creek and the Napa River.

Special-status Species

- Given the highly disturbed and modified nature of the Project Area, all special-status plant species known from the vicinity are unlikely or have no potential to be present there.



- Few special-status wildlife species have the potential to be present within or in close enough proximity to be impacted by the Project. Nonetheless, it is recommended that an occurrence potential table for special-status wildlife species known from the vicinity be developed and included in environmental documentation for the Project.
- Regarding avoidance of impacts to nesting birds and bat roosts, WRA recommends that EDFs 20 and 21 be respectively revised as outlined herein.

Please contact me with any questions.

Sincerely,



Jason Yakich
Senior Biologist
yakich@wra-ca.com

Ec: Linda Ruffing, North Coast Community Planning



REFERENCES

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Appendix E - Peer Review Reports 3. Historic Resources

June 4, 2024

Maya DeRosa, AICP
Community Development Director
City of St. Helena, Community Development Department

RE: Historic Built Environment Peer Review of the St. Helena Resort Project Environmental Assessment Report and Elements of the Cultural Resources Supporting Information within Appendix E for the Proposed Project within the Charles Krug Winery Property at 2800 Main Street, St Helena, Napa County.

Ms. DeRosa,

Evans & De Shazo, Inc. (EDS) completed a historic built environment peer review of the St. Helena Resort Project Environmental Assessment Report (EA), completed by First Carbon Solutions (FCS) on May 15, 2024,¹ and elements of the documentation within the “Cultural Resources Supporting Information” of Appendix E of the EA, submitted to the City in support of the voter-sponsored initiative known as the St. Helena Agritourism Initiative (Agritourism Initiative), not subject to review under the California Environmental Quality Act (CEQA). The proposed St Helena Resort Project (detailed below) is within an 11-acre portion of the 137.80-acre Charles Krug Winery property at 2800 Main Street, St Helena, Napa County, within Assessor Parcel Number (APN) 009-010-022 (Property). The Charles Krug Winery is currently listed on the National Register of Historic Places (NRHP; National Register #74000543; 1974), and the Charles Krug Winery Building is listed as a California State Historical Landmark (# 563).

At the request of the City of St. Helena, the historic built environment peer review was conducted by EDS Principal Architectural Historian Stacey De Shazo, M.A. (“peer reviewer”), who exceeds the Secretary of Interior’s qualification standards in Architectural History and History. The peer review was completed to provide guidance and recommendations to the City of St. Helena and the City Council, as needed.

St. Helena Agritourism Initiative Background

The St Helena Resort Project was proposed via a voter-sponsored initiative pursuant to Section 9200 et seq. of the California Election Code laws that would allow for approval of a 56-room maximum resort facility within the Charles Krug Winery Property by the St. Helena City Council, without review under CEQA. The voter-sponsored initiative (aka ballot measure), titled the “St. Helena Agritourism Initiative” (Agritourism Initiative), contains text changes necessary to amend the City’s General Plan, Zoning Ordinance, and Municipal Code to create a Winery and Planned Agritourism (WPA) Overlay Zone, which would facilitate the development of a 56-room resort hotel and agritourism facility (proposed project). Recently, the Agritourism Initiative ballot measure received enough voter support to qualify to be presented to the St. Helena City Council for further action. If the ballot measure is approved by the City Council, the Agritourism Initiative would amend the City of St. Helena’s General Plan and Zoning Ordinance to establish the WPA Overlay, which can only be applied on up to 11 acres of parcels in excess

¹ First Carbon Solutions, “St. Helena Resort Project Environmental Assessment Report,” May 15, 2024.



of 110 acres located within city limits but outside of the City's Urban Limit Line (ULL) with existing active agriculture and a winery and served by an existing railroad line. Specifically, the WPA Overlay would be applied to the Property to facilitate the development of the St. Helena Resort Project within the Charles Krug Winery Property, a 56-room maximum resort with 36 villas, six second-floor villa units; four estate house suites; one estate house junior suite; seven estate house rooms; and two guest rooms in refurbished, historic train cars facing the Napa Valley Wine Train tracks that bisect the larger winery property. As well as various public and visitor-serving amenities, such as an organic culinary garden and olive tree grove for meeting and event spaces, swimming pools, and an on-site spa and restaurant.

In addition, the Agritourism Initiative would introduce 92 specific Environmental Design Features (EDFs) addressing potential environmental issues, including aesthetics, air quality, biological resources, cultural and historic resources, energy efficiency, flooding, geology, contamination, noise, public services, traffic, utilities, water, water quality, and wastewater. The Agritourism Initiative requires the proposed project to adhere to and implement the EDFs.

Charles Krug Winery Historical Status

To begin the peer review, EDS has provided the following section detailing the **current historical status** of the previously documented built environment resources within the Charles Krug Winery Property.

Charles Krug Winery

- **1957:** The Charles Krug Winery building was listed as a California State Historical Landmark (# 563).
- **1974:** The Charles Krug Winery Property was listed on the NRHP (National Register #74000543). The listing includes the 1874 Winery Building (Redwood Cellar) and the 1881 Stable Building (the Oak House or Carriage House), known as the Winery Complex. Although the 1974 listing did not fully document the Property, the Statement of Significance on the NRHP form states, "The Charles Krug Winery and its surrounding vineyards are living reminders of a man and his accomplishments which form an integral part of the cultural and commercial heritage of California."² Although the listing is unclear, the "Winery Complex" was listed under Criterion B at the state level for its association with Charles Krug within a period of significance from 1861 to 1892.
- **2007:** The Charles Krug Winery was part of a Historic Property Tax Credit project that included seismic strengthening and rehabilitation of the 1874 Winery Building (Redwood Cellar) and alterations to the 1881 Stable Building (Oak House or the Carriage House). As part of the certification process, and only for the purpose of the rehabilitation project, the California Office of Historic Preservation (OHP) requested that the applicant provide supplemental documentation of the Property, including information on previously undocumented buildings within the Property, including a "Storage Shed, Tasting and Retail Room, Boiler House, Restroom Building, Barbecue Pavilion, Winery Operations Facility, Scale Facility, Hoppers, and the three dwellings." Information about these buildings was provided as part of the tax credit application for association with

² National Register of Historic Places, "Charles Krug Winery," (National Register #74000543), 1974.



Charles Krug but was not evaluated for individual eligibility and was not part of an amendment to the Charles Krug Winery National Register listing. The tax credit application also included updated photographs of the Property provided to the OHP and NPS.

EDS Comments

- The 1874 Winery Building (Redwood Cellar) and the 1881 Stable Building (aka the Oak House or Carriage House) within the Charles Krug Wine Property are listed on the NRHP and the California Register of Historical Resources (CRHR) for association with Charles Krug; however, the other current built environment resources, including three houses, a stone shed, production/warehouse/office, tasting room, shop, shed, toilets (page 125 of Appendix E), vineyards, and other elements within the Charles Krug Winery Property have not been documented or evaluated for listing on the NRHP or the CRHR.³ In addition, EDS suggests that the Property may also be eligible for its association with the Mondavi family, specifically Cesare, Peter, and Robert Mondavi, who, according to the supplemental documentation provided in 2007 by Architectural Resources Group (ARG) to the NPS as part of a Historic Property Tax Credit project (Pages 65-222 of Appendix E), “revitalized the site, renovated the main buildings, and established the “C.K. Mondavi” label. The Mondavi family brought innovation to the winery, experimenting with cold fermentation, focusing on Cabernet Sauvignon varietals, and introducing French oak for aging. The Mondavi family did things first at the Krug Winery that were to catch on in other places and become industry standards, such as developing winery tourism as early as 1949 with regular guided tours and a visitor center. The Mondavi’s published a wine newsletter, possibly the first in California. The family and their award-winning wines were instrumental in the growth of the wine industry in California.”

Napa Valley Railroad/Southern Pacific Railroad Historical Status

- A portion of the Napa Valley Railroad/Southern Pacific Railroad (P-28-000966) is located within the Property. The Napa Valley Railroad/Southern Pacific Railroad line has been the subject of numerous surveys, and the line is recommended as not eligible for listing on the NRHR; however, the rail line has not been evaluated for listing on the CRHR.⁴

EDS Comments

- EDS suggests that the Napa Valley Railroad/Southern Pacific Railroad section within the Property may be eligible for its association with the Charles Krug Winery or the Mondavi Family as part of a potential district. As such, if a Historic Resources Evaluation (HRE) of the Property is completed before the approval of the Agritourism Initiative, the section of the Napa Valley Railroad/Southern Pacific Railroad within the Property should be evaluated to determine if this section of the rail line is individually eligible or as part of a district, for its association with the Charles Krug Winery, or

³ Although there is information about these built resources within the Historic Property Tax Credit project, they were not documented or evaluated.

⁴ Department of Parks and Recreation (DPR) 523 forms, “Napa Valley-Southern Pacific RR” (P-28-000996).



the Mondavi family.

General Comments

- The EA does not appear to have been written with the assistance of a professional, qualified architectural historian who is needed to advise on potential impacts to historic built environment resources.

EDS Review of the First Carbon Solutions Environment Assessment and Appendix E

Although the Agritourism Initiative is not subject to review under the CEQA, the FCS EA and Appendix E contain information regarding historic built environment cultural resources within the Property. The following section focuses on reviewing the EA and Appendix E and provides recommendations related to the known historic built environment resources within the Property.

EA: Table 3; Page 3

“Development under the Agritourism Initiative would result in the following potential impacts to cultural resources: (1) The removal of a minimal number of historic vineyard rows associated with the National Register of Historic Places (NRHP) listed Charles Krug Winery; (2) Potential viewshed impacts to the Charles Krug Winery; (3) Modifications to the Napa Valley Wine Train/Southern Pacific Railroad Tracks on the project site; (4) Potential impacts to an Indigenous archaeological resource. The Agritourism Initiative includes seven EDFs which are specifically intended to protect historic, cultural, and tribal Cultural Resources (TCRs) and requires the preparation of an Archaeological Treatment, Testing, and Curation Plan to assess the potential for presence of archaeological, paleontological and TCRs. allowing for the development of the proposed St Helena Resort Project (detailed below) within the Charles Krug Winery.”

EDS Comments

In Table 3, FCS lists potential impacts on historic built environment cultural resources, including the following “elements.”

- Historic vineyard rows associated with the National Register-listed Charles Krug Winery
- Charles Krug Winery “viewshed”
- Napa Valley Wine Train/Southern Pacific Railroad Tracks

EDS Review: Historic Vineyard

- The term “historic vineyard” is only used once in the EA within Table 3, and no details explain this reference within the EA or Appendix E. In addition, Page 58 of the EA states the “vineyard has been surveyed and documented (Appendix E).” EDS reviewed Appendix E and could not find that the term “historic vineyards” or any existing or previously existing vineyards within the Property had been surveyed or documented as part of a survey by a qualified architectural historian. Neither the National Register documentation nor any other documentation of the Property provides any evidence that an architectural historian recently surveyed the built environment



resources within the Property. As such, impacts as a result of the Agritourism Initiative cannot be accessed based on the current documentation within the EA or Appendix E.

EDS Recommendations:

EDS recommends that an HRE of the Charles Krug Winery Property is completed prior to moving forward with the approval of the Agritourism Initiative, as the demolition of “historic vineyards” or a reduction of the vineyard within the Property could significantly impact its integrity, including its feeling, setting, and association.

EDS Review: Charles Krug Winery “viewshed”

- Although the EA clearly states that there could be impacts to the Charles Krug Winery “viewshed” (EA pages 3, 58, 59, and 63) as a result of the Agritourism Initiative that would allow for the construction of the St. Helena Resort Project, the term “viewshed” is not used in accessing impacts to historic built environment resources. In addition, the statement on Page 58 of the EA that “The Agritourism Initiative would not directly impact the buildings listed in the NRHP and CRHR. It is currently assumed that any potential impacts to these buildings would be related to the viewshed” may be misleading. Although the two buildings listed on the NRHP/CRHR may not be directly impacted, the other buildings, vineyards, and various built environment elements, including roads, fencing, and other elements, have not been evaluated for the NRHP or the CRHR. As such, direct or indirect impacts cannot be accessed based on the current documentation with the EA or Appendix E.

EDS Recommendations:

It appears that the term “viewshed” within the EA refers to the setting of the Property, which is the larger area or environment in which the National Register-listed Charles Krug Winery Property is located. As such, EDS recommends that the EA clarify the term “viewshed.”

EDS also recommends that an HRE of the Krug Winery Property be completed prior to moving forward with the Agritourism Initiative, as the demolition of any “historic vineyards,” the reduction of the vineyards, and changes to the setting of the Property, including roads, setbacks, fencing, and views, and introduction of new building can significantly affect the integrity of the historic property/historical resource.

In addition, EDS recommends that a qualified architectural historian complete a Secretary of the Interior’s Standards for the Treatment of Historic Properties (Standards) review to provide guidance to historic property owners, architects, contractors, and the City of St. Helena (project reviewers) prior to the beginning of any work within the National Register-listed Property.

Additional Comments:

- EA; Page 58: FCS states the “Winery Buildings” are “Potentially Eligible for State Historical Landmark”; however, the 1874 Charles Krug Winery Building (Redwood Cellar) is a listed landmark (#563).
- EA: Section 6.2.4, Page 58: Although the EA states a “cultural resource pedestrian survey of the



project site was completed on February 22, 2024"; however, it does not appear that a qualified architectural historian participated in the survey and that the vineyards were documented or evaluated.

Conclusion and Recommendations

The current documentation of the Charles Krug Winery Property lacks complete documentation and evaluation of the built environment resources within the Property. In addition, it does not appear that the association with the Mondavi family has been considered part of the Property's significance. This is extremely important to address before the approval of the Agritourism Initiative, particularly given the importance of the Mondavi family to the wine industry in Napa Valley. As such, EDS recommends that the City of St. Helena consider requiring the completion of an HRE and DPR 523 forms and a Standards review to determine if there will be any impacts to historic properties/historical resources.

Thank you for the opportunity to complete this review.

Sincerely,

Stacey De Shazo, M.A. Principal Architectural Historian
Evans & De Shazo, Inc.
stacey@evans-deshazo.com

Appendix E - Peer Review
Reports 5. Noise



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Date: May 30, 2024

To: **Maya DeRosa**
Community Development Director
City of St. Helena
1088 College Avenue
St. Helena, CA 94574

Cc Linda Ruffing
North Coast Community Planning
707.272.2343
linda@nceplanning.com

From: Paul R. Donovan, ScD
Illingworth & Rodkin, Inc.
429 E. Cotati Ave
Cotati, CA 94931
pdonavan@illingworthrodkin.com

RE: **St. Helena Agritourism**

SUBJECT: Peer Review of St. Helena Resort Project Environmental Assessment Report Regarding Noise

Illingworth & Rodkin, Inc. (I&R) peer reviewed the noise section of the St. Helena Resort Project Environmental Assessment Report. The results of our review are described below.

Project Understanding Related to Noise

An Environmental Assessment Report was prepared to provide an analysis of the Agritourism Initiative's potential impacts upon the community and environment. The Agritourism Initiative would amend the City of St. Helena's General Plan and Zoning Ordinance to establish the Winery and Planned Agritourism Overlay (WPA Overlay), which can only be applied on up to 11 acres of large parcels in excess of 110 acres located within city limits but outside of the City's Urban Limit Line (ULL) with existing active agriculture and a winery and served by an existing railroad line. Specifically, the WPA Overlay would be applied to a certain property to facilitate the development of up to a 56-room maximum world-class resort (proposed project) on the property known as the Charles Krug Winery (winery) located at 2800 Main Street in the City of St. Helena. I&R reviewed Section 6.2.9 – Noise and the corresponding Appendix H: Noise Calculations Sheets pertaining to the proposed project at 2800 Main Street in St. Helena, California.

The proposed project would consist of up to 36 villas; six second-floor villa units; four estate house suites; one estate house junior suite; seven estate house rooms; and two guest rooms in refurbished, historic train cars facing the Napa Valley Wine Train tracks that bisect the larger winery property. A variety of public and visitor-serving amenities are also proposed as part of the resort project, from an organic culinary garden and olive tree grove to meeting and event spaces, swimming pools, and an on-site spa and restaurant. The Agritourism Initiative also includes 92 specific Environmental Design Features (EDFs) that address potential environmental issues, including aesthetics, air quality, biological resources, cultural and historic resources, energy efficiency, flooding, geology, contamination, noise, public services, traffic, utilities, water, water quality, and wastewater. Two of these address noise management.

Construction of the proposed project is anticipated to start January 2026 and would be completed over the course of 18 months. An estimated 16,700 cubic yards (CY) of import soil would be required to meet the site grading scheme.

Summary of Noise Findings in the Environmental Assessment Report

The Noise Section, 6.2.9, is divided into areas that consider Construction Noise Impacts, Operational/Stationary Sources Noise Impact, Operational/Mobile Source Noise Impacts, Short-term Vibration Impacts, Operational Vibration Impacts, and Airport Noise Impacts. The Operational/Stationary Source Noise Impacts are further subdivided into Mechanical Equipment Operations and Parking Lot Activities. The analysis identifies two EDFs that shall be implemented if the project is approved. The first (EDF 47) is that the construction contractors shall be required to provide and implement a Noise Management Plan to reduce construction noise at off-site residences to the extent feasible. The second (EDF 48) addresses operational issues to be included in a noise management plan. These include restricting the time in which specific operations can only be performed to 7:00 a.m. to 10:00 p.m. and equipping noise-generating equipment with noise control devices, using haul routes that avoid noise sensitive land uses, locating staging areas and construction material storage away from adjacent residences, and using noise reducing measures for pile driving activities. Vibration levels were assessed for construction activities and found to be well below the levels that could create structural damage to the existing structures on the property. Operational vibration levels were found to be lower than that detectible for persons in the project vicinity. Noise from the Napa County Airport 23 miles south of the project may produce audible levels when overflying the project site, however, not above acceptable standards.

Noise Peer Review

Construction Noise

A number of issues regarding the prediction of construction noise levels should be clarified. First, it appears that the calculation in pages 70 and 71 were based on the Federal Highway Roadway Construction Noise Model, RCNM. If this is so, it should be stated. In the example on page 71, it appears that the five multiple pieces of equipment were one of each type yielding the L_{eq} value of 51 dB overall. It might be helpful to site these as a range: five graders would produce 53 dBA, while five front end loaders or backhoes would produce 46 dBA, however, this would not affect the conclusion. In regard to interior noise for the residences on the southwest side of the project area, it could be noted that State Route 29 (SR 29) lies in between the project site and the residences. A simple calculation of the daytime roadway traffic noise levels could help to reinforce that the construction noise is not expected to be an issue in the interior of these dwellings.

Operational/Stationary Source Noise Impacts

It appears that the stated expected interior noise due to mechanical equipment is based approximately on an average of the 45 to 60 dBA source levels. Based on our experience, assuming a 25 dB exterior to interior noise reduction is typical. With that amount of noise reduction, the interior levels would be expected to range from about 15 dBA to 30 dBA. If this were compared to SR 29 traffic noise levels, the conclusion of the mechanical equipment being “less than perceptible” may be further supported.

Parking Lot Noise

The estimated source levels are expressed as L_{max} however, the estimated interior levels are expressed as L_{eq} . Issues such as door slams and possible horn honks are basically impulsive. Assuming the worst case of 70 dBA L_{max} at 50 feet, the impulsive noise levels would still be only about 15 dBA L_{max} on the interior and 40 dBA L_{max} on the exterior for the worst case. The L_{eq} levels would even be substantially lower. It may be worthwhile to note this in the discussion.

Operational/Mobile Source Noise Impacts

No issues or concerns were noted for this section.

Short-term Construction Vibration Impacts

A reference for the source level of a small vibratory roller should be provided. It should be noted as to whether or not the winery building is deemed to be a historic structure as lower threshold levels may be appropriate; however, the assessment would not be affected.

Operational Vibration Impacts

No issues or concerns were noted for this section.

Airport Noise Impacts

No issues or concerns were noted for this section.

General Comments

Throughout the Noise section, many noise levels are cited without any references. This should be addressed by the proper references, or at least citing the source in the write-up itself. Also it is assumed that the RCNM was used for the calculations and should be stated if that is the case.

Submitted by

A handwritten signature in black ink that reads "Paul R. Donavan". The signature is written in a cursive style and is positioned above the typed name and title.

Paul R. Donavan, Sc.D.
Principal
Illingworth & Rodkin, Inc.

TECHNICAL MEMORANDUM

May 22, 2024

Project# 21900

To: Paul Wade, P.E.
Coastland Civil Engineering
1400 Neotomas Avenue
Santa Rosa, CA 95405

From: Aaron Elias, T.E.

RE: Krug Resort TIS Review

This technical memorandum documents Kittelson & Associates, Inc. review of a transportation impact study (TIS) performed by W-Trans and dated April 16, 2024 for a resort project proposed to be located at 2800 Main Street in St. Helena, CA. The proposed project would construct a 56-room resort with a 150-seat restaurant. Based on our review of the TIS, Kittelson had the following comments for W-Trans:

- Executive Summary (4th Paragraph)
 - Queueing is not a CEQA impact. Kittelson recommends not using “less-than-significant” or “significant” language to describe non-CEQA issues. This is a minor language issue and no updates to the TIS are recommended unless it is updated for other reasons.
- Study Areas and Periods, Page 4, Final Paragraph
 - Text notes traffic counts were collected on Friday, January 26th and Saturday, January 27th between 4 and 6 PM. Typical traffic counts are collected for a midweek day between 4-6 PM and on weekends sometime during the midday period. The text provides no documentation for why a Friday was collected between 4-6 PM rather than a typical midweek day or why Saturday 4-6 was collected rather than midday. Please provide additional documentation such as 7-day tube counts or other studies for why the counts collected represent peak conditions in St Helena rather than the use of typical midweek PM and Saturday midday counts.
- Collision History, Page 5, Final Paragraph
 - The text notes that half the collisions were broadside collisions and one was head on with a conclusion that all involved different types of movements and “Therefore, due to lack of similarity between the collisions, no remedial action is suggested.” It is unclear how half the collisions at a “T” intersection could be broadsides and there be a lack of similarity between them. The broadsides most certainly all occurred with vehicles turning into and out of Deer Park Road so they are all in fact related to the unsignalized control of the intersection. Additionally, it is recommended the last sentence of the paragraph be removed. The statement “within normal safety parameters” is not backed up by any facts and is not typical term. Kittelson suggests the section be rewritten to focus on the known facts. Focus should then be on whether these collisions meet the safety signal warrant. Are there enough collisions that trigger the safety warrant. If not, simply state the number of collisions is not sufficient to meet safety warrants for the installation of a traffic signal per the MUTCD.

- Trip Generation, Page 6, 2nd Paragraph
 - Please provide additional documentation for why 25% of restaurant patrons are assumed to come from the hotel.
- Trip Distribution, Page 8, Table
 - The overall trip distribution seems a little off. The travel time between the project site and SR 12 south of Napa is about the same whether you take SR 29 or Silverado Trail yet almost all of the southbound traffic is assumed to take Silverado Trail. I would anticipate something closer to 60/40 or 50/50. While the TIS states a sign will direct people to Silverado Trail, most people will use their GPS which based on the travel time is just as likely to send people to SR 29 as Silverado Trail. Is there any additional documentation you can add to the TIS on why Silverado Trail is so much more preferred than SR 29?
- VMT Section, Pages 12-14
 - Kittelson disagrees with the method used to screen out the Hotel and Restaurant Customer VMT. The point of the retail screenings is that retail less than 50,000 square feet is normally serving locals in the vicinity of the project. Hotel guests by definition are non-locals. Converting the hotel daily trip generation into an equivalent retail square footage to show the hotel is a local serving use will potentially open the project up to litigation. Kittelson suggests removing the section on Hotel and Restaurant customer VMT and only includes the calculations for employee VMT. Employee VMT is the only thing the hotel can really control anyway, and customer trips are likely coming to St Helena whether the hotel is built or not. It is cleaner to just analyze the project for its effect on employee VMT.
- Existing Plus Project Conditions, Page 22
 - LOS for two-way stop controlled intersections is traditionally reported for the worst approach. Just because the overall intersection shows acceptable does not mean the two-way stop controlled intersection operates well. Since the westbound approach is failing today and the project makes it worse, the St Helena criteria for looking at whether signalization is warranted should be performed. Please perform a peak hour signal warrant analysis both with and without the project under existing and future conditions to determine whether the signal warrants are met.
- Parking, Page 25
 - Please include a copy of the project's parking agreement with Charles Krug Winery to provide up to 50 off-site parking spaces.

COASTLAND

DCEM

Memorandum

Date: June 7, 2024

To: Joseph Leach, Public Works Director/City Engineer

From: Paul W. Wade, Consulting Civil Engineer

Subject: St. Helena Resort – Comments on the Sherwood Infrastructure Report

Sections 3.0 Water and 3.2 Water Demands

Section 3.0 states in part:

The Project is located in a California Statewide Groundwater Elevation Monitoring (CASGEM) High Priority Basin which requires a local Groundwater Sustainability Agency (GSA). Napa County's Groundwater Management Ordinance (GMO) implements these GSA requirements, which generally cover approval of water supply systems, wells, and conservation. In accordance with the GMO, the Project will be a steward of local water resources by demonstrating a water use scheme with no net impact on the aquifer.

Section 3.2 states in part:

The Project is located in the Napa Valley Floor groundwater area which is allocated 0.3 acre-feet per acre per year of new groundwater withdrawals. One acre-foot is equivalent to 325,851 gallons. Because the Nobel House Hotel will repurpose previously permitted groundwater extraction, the 140-acre parcel will demonstrate a net water usage not exceeding 13.7 MGY (37,500 GPD) for no net increase in groundwater use.

Comments:

This last sentence seems to be misconstruing the maximum annual allowance for new groundwater withdrawals with the concept of no net increase. The existing Krug Winery extraction rates are provided in Table 3 and total 11,921 GPD or 4.35 MGY (process plus vineyard irrigation; domestic is supplied by a City service). The proposed increased extraction rate is 30,300 GPD or 11.06 MGY. While this is less than the 0.3 acre-feet per year allocated for new groundwater withdrawals, it is clearly an increase in groundwater

use. The interpretation of the County's Groundwater Management Ordinance needs to be carefully reviewed as it relates to this proposed increased groundwater use.

In addition, it seems likely that the resort site will be separated from the greater 140-acre winery site through a land division. This raises the question of whether the groundwater allocation from the remaining larger winery parcel can be shared with the resort property. Again, the County's Groundwater Management Ordinance needs to be carefully reviewed to see if it addresses shared groundwater allocations.

Finally, there is no mention of how groundwater use will be monitored or enforced. However, if a new well is developed or an existing well is expanded, it would be subject to St. Helena Municipal Code 13.16 which requires metering of the well production, monthly groundwater level monitoring and annual reporting to the City.

Section 9.2 FEMA Floodplain

Comment:

This section acknowledges that a small wedge of land at the northern corner of the resort site falls within a Regulatory Floodway as shown on the FEMA Flood insurance Rate Map (FIRM) and goes on to state that Project development will remain outside of the floodway. However, this ignores the two new access driveways north of the Project site that will cross through the Floodway.



COASTLAND

DCEM

Memorandum

Date: June 7, 2024

To: Joseph Leach, Public Works Director/City Engineer

From: Paul W. Wade, Consulting Civil Engineer

Subject: St. Helena Resort – Comments on the Agritourism Initiative and EDFs

St. Helena Agritourism Initiative

- Section 2.A.8 states that the Winery and Planned Agritourism Overlay (EDF Overlay) will be applied to 11 acres within the larger 140-acre winery site as depicted on Exhibit A. Exhibit A should be accompanied by a metes and bounds legal description of the subject property.
- Some of the exhibits indicate “property lines around the 11-acre WPA Overlay Property. Would dividing this from the larger Winery Property invalidate the application of the land use overlay to large parcels in excess of 110-acres? It should be made clear whether there will be a land division is anticipated with the development of the resort.
- Section 2.G.1 should state that SHMC 16.32.160 requiring connection to the City’s sanitary sewer system will not apply.
- Section 2.G.2 should state that SHMC 16.32.150 requiring connection to the City’s water system will not apply.
- Section 2.G should state whether SHMC 16.32.060.C.2 requiring improvement of lot frontages with curbs and sidewalks will apply to the SR 29 and Deer Park Road frontages.

Initiative Exhibit C, Environmental Design Features (EDFs)

EDF 50: Project water lines and hydrants shall be sized and located so as to meet the fire flow requirements established by the Fire Department.

Comment: This should also include any necessary water storage and pumping facilities.

EDF 55: No construction may commence until adequate access to fire water supply is available to building sites as approved by the Fire Chief.

Comment: This should be clarified to only apply to building construction and not site grading and utility improvements.

EDF 70: In the event the City of St. Helena installs a traffic signal at SR 29/Deer Park Road, the Project Applicant shall pay its proportional share of the cost of the signal at the time the signal is constructed by the City.

Comment: The methodology for determining “proportional share” should be defined.

EDF 73 Prior to issuance of a Certificate of Occupancy, the Applicant shall pay traffic impact fees based on the City's Master Fee Schedule, and the fee will assume all square footage calculated at the lodging rate.

Comment: Is it acceptable to the City for the lodging rate to apply to the restaurant and spa square footages? Do the traffic impact fee rates in the City's Master Fee Schedule supersede the rates in SHMC 3.32.100.B.2?

EDF 75: Prior to occupancy, Applicant shall construct, to the extent not previously constructed, a minimum 8-foot wide paved bicycle and pedestrian trail, which shall be open to the public, along the railway and within the property rights of the railway operator, between the Project site and Fulton Lane, provided that such obligation to construct is subject to issuance or any required permits, with reasonable and feasible conditions, from any federal and/or state agency with jurisdiction over construction affecting jurisdictional waters.

Comment: The trail should be extended northwest through the Project site to connect to Deer Park Road.

EDF 76: Prior to the issuance of a Certificate of Occupancy, the Applicant shall underground on-site utility lines per the applicable requirements of the St. Helena Municipal Code. The cost of undergrounding shall be the responsibility of the Applicant. Due to the economic and engineering infeasibility of undergrounding any regional serving overhead power lines, any such existing lines may remain on overhead power poles.

Comment: This should be clarified as to whether it applies to the existing overhead utilities along the greater winery site's frontage along SR 29.

EDF 80.c: The Project with existing groundwater uses on the Winery Property will not annually exceed 0.3 acre-ft/acre of groundwater extraction from the Project well(s).

Comment: It is assumed that the 0.3 acre-ft/acre/year figure comes from Napa County's Groundwater Management Ordinance. However, it needs to be determined whether the acreage of the greater winery/vineyard property can be included if the resort property is divided from winery property.

EDF 86: Prior to the issuance of a Certificate of Occupancy, a Post Construction Stormwater Operations and Maintenance Plan that provides a color-coded plan sheet showing all



storm drain and water quality infrastructure that is to be maintained, along with detailed instructions and schedules for the ongoing maintenance and operation of all post-construction stormwater BMPs shall be submitted by the Applicant's engineer for review and approval by the City Engineer. Once approved, the property owner shall comply with the Post Construction Stormwater Operations Maintenance Plan BMPs.

Comment: This should include entering into a Post Construction Stormwater Operations and Maintenance Agreement with the City.

