



November 2, 2020

Via email: bfreeman@napa.lafco.ca.gov

Brendon Freeman, Executive Officer
Local Agency Formation Commission (LAFCO)
1030 Seminary Street, Suite B
Napa, CA 94559

Re: Comments on Napa Countywide Water and Wastewater Municipal Service Review
Administrative Draft #2

Dear Mr. Freeman:

The City of American Canyon appreciates the opportunity to review Napa County's Local Agency Formation Commission's (Napa LAFCO) *Napa Countywide Water and Wastewater Municipal Service Review* and requests the following comments to be incorporated into the record.

Figure 4-5 on Page 75 accurately depicts American Canyon's 'Water Service Area'. The Figure's Legend depicts a 'purple line' and describes it as the "American Canyon Water Service Area" with reference to the *American Canyon General Plan Final Environmental Impact Report*, certified November 3, 1994. While this reference to 'Figure WR-1' is accurate, it is worth noting its place in the continuum of documents that establish, recognize, and analyze the existence of American Canyon's Water Service Area. Other documents include: Figure 14 in Exhibit A, American Canyon's *2015 Urban Water Management Plan* (and its predecessors), and various contracts established between American Canyon, Napa County Flood Control and Water Conservation District and the State Department of Water Resources for the provision of water from the State Water Project.

Thank you for your consideration of our comments. If you have any questions or require additional information, please contact me directly at (707) 647-4351.

Sincerely,

A handwritten signature in black ink that reads "Jason B. Holley". The signature is written in a cursive, flowing style.

Jason B. Holley
City Manager

Exhibit A – Excerpt from Napa LAFCO's *American Canyon Incorporation Project Final Environmental Impact Report* certified in April 10, 1991



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COPY

1990 AMERICAN CANYON INCORPORATION PROJECT Final Environmental Impact Report

March 1991

SCH # 90030578

Prepared for:
Napa County
Local Agency
Formation Commission

**Environmental
Science
Associates, Inc.**

301 Brannan St.
Suite 200
San Francisco, California
94107-1811
(415) 896-5900

Also offices in

Los Angeles

Sacramento

90-384



**1990 AMERICAN CANYON INCORPORATION
FINAL ENVIRONMENTAL IMPACT REPORT**

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- /2/ Energy Conversion factors (all factors given represent at-source values): 1 kWh = 10, 239 Btu; 1 therm = 100,000 Btu; 1 gallon of gasoline = 140,000 Btu; 1 barrel of crude oil = 5,800,000 Btu.
- /3/ Based on average electrical consumption in Napa County.

F. COMMUNITY SERVICES AND UTILITIES

SETTING

Schools

The proposed American Canyon Incorporation area is served by the Napa Valley Unified School District (NVUSD) which encompasses the southern portion of Napa County. Students from American Canyon attend Donaldson Way and Napa Junction elementary schools, which are both located within the proposed incorporation boundary. Middle and high school students attend Silverado and Redwood Middle Schools and Vintage and Napa Senior High Schools, which are located in the City of Napa. In the 1989-90 school year, approximately 60 percent of NVUSD's students attended elementary, 14 percent attended middle, and 26 percent attended high school. The current capacities and enrollments at these schools are presented in Table 19. As illustrated by this table, the elementary schools in the district are currently over capacity.

State law allows for school districts to charge developer fees. NVUSD has instituted a District-wide developer fee of \$1.50 per square foot for dwelling units and \$0.25 per square foot for commercial and industrial buildings.

Water

Potable water treatment and delivery within the proposed American Canyon Incorporation area is provided by the American Canyon County Water District (ACCWD). The water service area covers 20,552 acres (about 32 square miles) and extends beyond the proposed American Canyon incorporation boundaries. The area extends from Soscol Creek and Soscol Ridge in the north to the Napa County/Solano County line in the south and from the Napa River in the west to the Napa/Solano County line in the east (See Figure 14). Lands within the Napa County Airport are also served by the ACCWD.

TABLE 19: EXISTING SCHOOL CAPACITIES AND ENROLLMENT

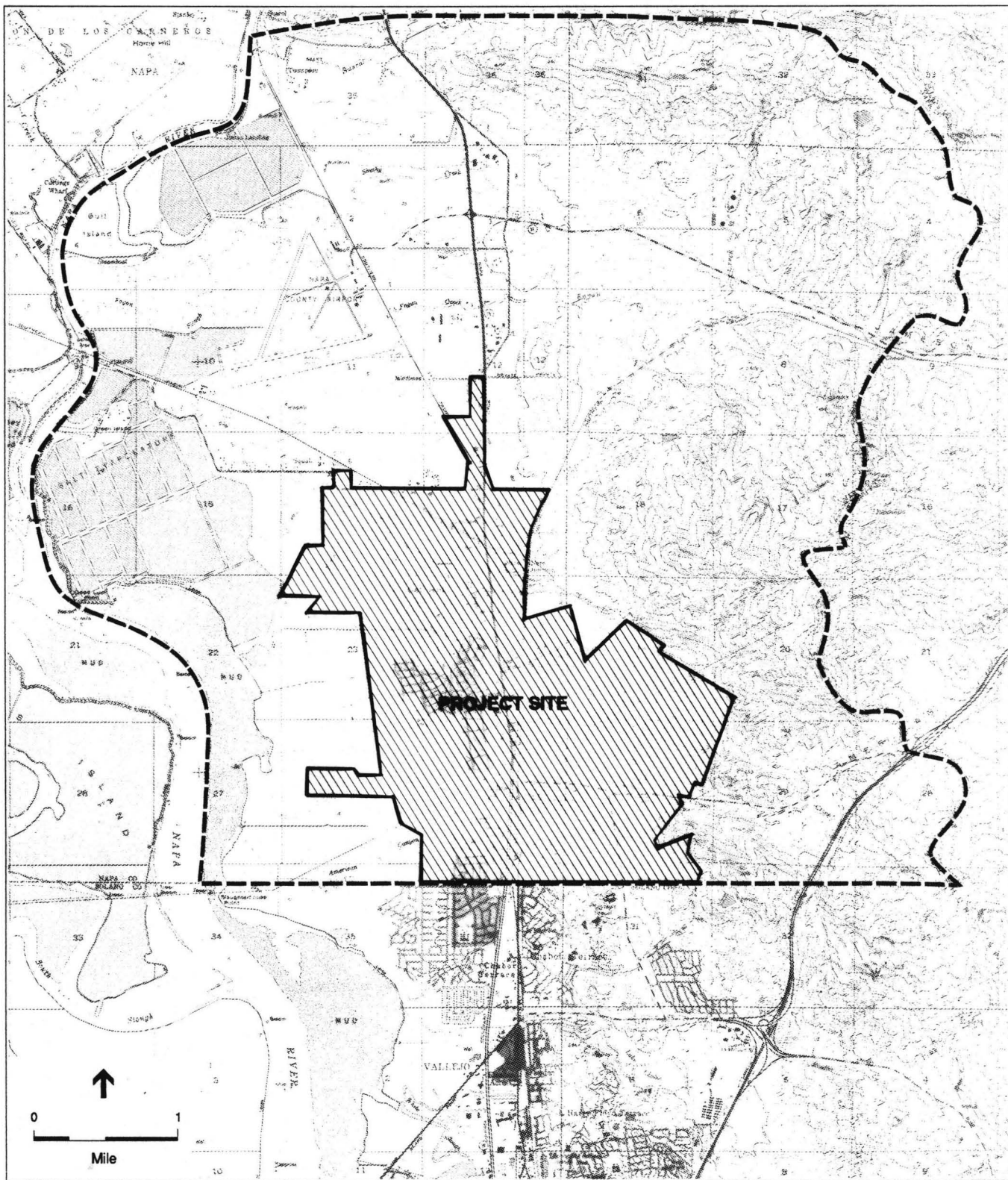
<u>School</u>	<u>1990 Capacity</u>	<u>Enrollment 1989-90</u>
<u>Elementary Schools (K-6) /a/</u>		
Donaldson Way	283	292
Napa Junction	<u>379</u>	<u>472</u>
Total	662	764
<u>Middle High Schools (7-8) /b/</u>		
Silverado	1,200	963
Redwood	<u>1,200</u>	<u>868</u>
Total	2,400	1,831
<u>High Schools (9-12) /b/</u>		
Vintage	3,300	1,686
Napa High	<u>3,300</u>	<u>1,634</u>
Total	6,600	3,320

/a/ Capacity does not include portable classrooms currently in use.

/b/ Capacity includes portable classrooms (30 students each) currently in use.

SOURCE: Napa Valley Unified School District; Environmental Science Associates, Inc.

The service area for the ACCWD was established under an agreement with the Napa County Flood Control and Water Conservation District (NCFCWCD). The NCFCWCD is the prime contractor to the State Department of Water Resources for water delivered from the North Bay Aqueduct. The ACCWD water service area, under subcontractor agreements with the NCFCWCD, is assigned a water service area which is independent of other District services (e.g., recreation and wastewater), the District's sphere of influence, and the District's boundaries (Figure 14). These agreements essentially established the ACCWD as the sole deliverer of state water within the study area. No other source of water has been developed. Water provided by the ACCWD outside of the district's boundary is provided under individual water contracts which are not subject to LAFCO review.



SOURCE: American Canyon County Water and Sewer District

American Canyon / 0384 ■

Figure 14
ACCWD Water Service Area

ACCWD operates several facilities including a water treatment plant on Lynch Road, north of S.R. 12. The water treatment facility is adjacent to the City of Napa's water treatment plant. An above ground reservoir located north of Eucalyptus Drive provides 2.2 million gallons of storage. The ACCWD maintains a distribution system to supply local customers. **The current demand for water is 4.8 acre feet a day (Iund, 1990).**

Current Water Supply

The ACCWD's current water demand is supplied from three sources. The primary source is raw water purchased from the NCFCWCD. The second source, effective until 1997, allows for the supply of treated water from the City of Napa to certain contract areas. The third source is a small quantity of treated water purchased from the City of Vallejo. The water from the City of Vallejo is used to supplement service to customers who are in close proximity to Vallejo's distribution system. (Water System Master Plan, September 1990) Neither the second or third sources of water are long-term sources of water. (Faisst, 1991)

In both 1989 and 1990, the ACCWD purchased 200 acre feet of water from the Yuba County Water Agency to be used from May through September. This water is provided to the District based on availability and may not be available in the future. In addition to this allocation, the District can purchase surplus water not purchased by other entities under contract to the NCFCWCD. (Iund, 1990)

Future Water Availability

Long-term availability of water is based on ACCWD's contracts with the NCFCWCD. The contract provides for increased annual allocations to the year 2015. The allocation increases 200 acre feet annually with actual purchase of water based on yearly projections by the ACCWD. The 1990 allocation was 2,200 acre feet per year (AF/Year). Assuming the established yearly rate of increase results in a 1992 allocation of 2,600 AF/Year, a year 2000 allocation of 4,200 AF/Year, and a year 2015 allocation of 5,200 AF/Year.

State Water Availability

Due to drought, changing water policies, and additional demand, concern has been raised regarding the ability of the State Water Project to meet contractor entitlements.

The California State Department of Water Resources (DWR) has indicated they have a well-defined source and a firm supply of water until the year 2035, and they anticipate meeting their full entitlement requirements. In addition, the State has contract clauses that detail exactly how available water will be rationed in the event of a drought. Initially, allocations for agricultural users are reduced prior to allocations for municipal and industrial users. During periods (years) of normal rainfall, the DWR has enough water to meet contractor demands. (Jercick, 1990)

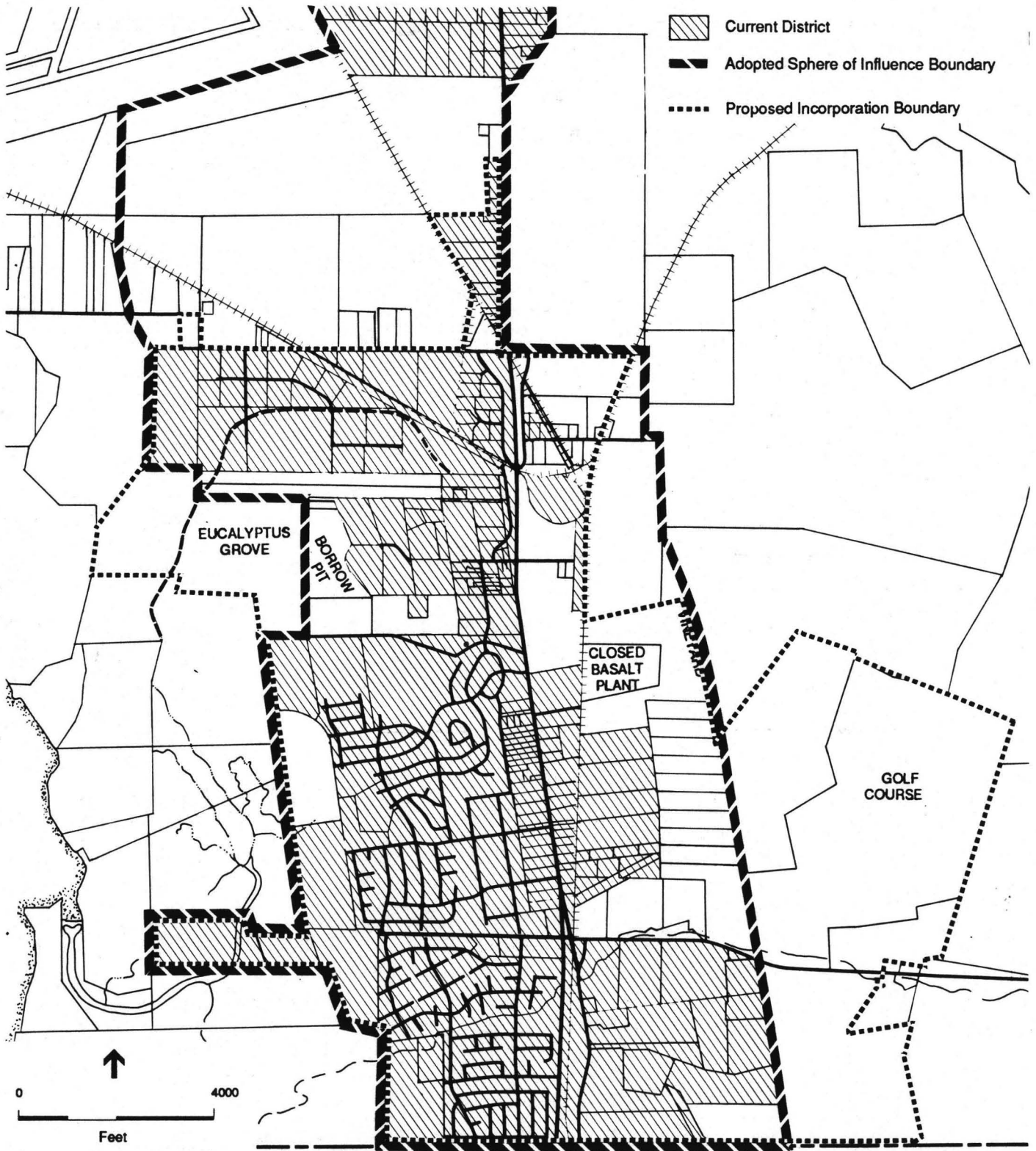
Future Water Supplies

In September of 1990, the ACCWD commissioned a Water System Master Plan. The Plan indicates that the ACCWD must consider the possibility that the State Water Project may not be able to deliver all contracted water. The preparers of the Plan indicate that their information was based on outside research and was the result of judgment on their part. (Faisst, 1991) The ACCWD is actively pursuing additional water sources at this time in order to increase available water supplies. (Iund, 1990)

Because of uncertain water supplies and anticipated increased demand in the area, the Water System Master Plan addresses the availability of future water supplies. The Plan suggests four actions to stabilize future water supply: implementation of a water conservation program; continuation of dialogue with the NCFWCWD to increase ACCWD's allocation; initiation of studies on the possible purchase of water from nearby water-rich areas; and initiation of studies on the potential use of a reverse osmosis system for the desalinization and purification of groundwater or Napa River water. (Water System Master Plan, September 1990)

Wastewater

The American Canyon County Water District (ACCWD) currently provides wastewater service to the project area excluding areas east of Flosden Road. The District's sphere of influence extends from the Napa County line north to Fagan Creek (the boundary and sphere are congruent on the west), and the sphere of influence extends approximately one-half mile to the east of State Route 29 (See Figure 15). The current sphere of influence includes portions of the Airport Industrial Area Specific Plan.



SOURCE: American Canyon Water and Sewer District

American Canyon / 0384 ■

Figure 15
Water District
Sphere of Influence

The District generally provides service to areas west of State Route 29 and to some areas of the Airport Industrial Area just south of Fagan Creek. The District includes a total of approximately 670 acres and serves approximately 2,220 households. Sewer service is currently provided to 501 acres within the district's boundaries.

Treatment and Disposal

The District's sewer service area has three main sub-areas; Green Island Road, Tower Road, and American Canyon. The Green Island Pump Station Sub-area covers the ACCWD area north of Hess Drive. The wastewater collected in this area is transported to the Green Island Pump Station for discharge directly to the force main pipeline going to the Napa-American Canyon Wastewater Management Authority's (NACWMA) joint treatment plant at Soscol Creek. The NACWMA is comprised of the Napa Sanitation District (NSD) and the ACCWD. The second sub-area is Tower Road Pump Station Sub-area, which covers the portion of ACCWD located west of Kelly Road and south of Fagan Creek. The third sub-area provides wastewater treatment to the American Canyon Community generally south of Hess Drive. A pre-treatment pond facility is located at the terminus of American Canyon Road. Wastewater is pumped from this facility via an 18-inch force main to the Soscol Treatment Plant. The pre-treatment pond facility is used primarily to reduce the Biological Oxygen Demand (BOD) concentration of the effluent and to regulate flows to the Soscol Treatment Plant.

Soscol Treatment Plant's combination of effluent from ACCWD and NSD has historically been discharged into the Napa River during the winter months. During the summer months, the NACWMA has developed a land application system which sprays treated effluent on irrigated land planted with alfalfa. Additional land disposal is needed to accommodate increasing summer flows.

Available Capacity

The ACCWD has an available capacity of 2.34 million gallons a day (mgd). The District calculates wastewater generation as 60 percent of the water demand. Current wastewater generation is 0.807 mgd (Iund, 1990). **In the near term, ACCWD needs to address capacity deficiencies at its oxidation ponds. In the long-term, the District will need to increase its wastewater treatment and disposal capacity to accommodate projected demand from growth within its service area. The NSD and ACCWD have jointly prepared a Sewer System Master Plan Update (John Carollo Engineers, 1990).**

The Master Plan will update the NSD's 1988 Sewer System Master Plan and the ACCWD's 1987 Wastewater Master Plan. **The Master Plan Update recommends several projects to address needed wastewater treatment and disposal improvements and the upgrading and expansion of the existing joint wastewater treatment facilities. NSD and ACCWD are currently preparing an EIR on the joint Master Plan. At the same time, ACCWD is conducting additional independent studies of its wastewater system's short and long-term needs and options.**

Both the ACCWD oxidation ponds and the NACWMA oxidation ponds at the Soscol Plant have recently experienced odor problems during periods of cold weather at loadings less than the original design criteria. Under current loadings, both pond systems are considered to be overloaded with respect to their ability to handle the biochemical oxygen demand (BOD). Both facility improvements and operational changes are proposed to address this oxidation pond capacity deficiency. The joint Sewer System Master Plan update recommends upgrading the treatment process at the Soscol Plant to provide 100% primary treatment of NSD sewage and to provide secondary treatment via an activated sludge process. Sludge removal and disposal is also recommended to clean the Soscol ponds of accumulated sludge. The Master Plan update indicates that the ACCWD oxidation ponds would no longer be needed if the recommendations at the Soscol Plant are implemented. However, ACCWD would probably continue to operate the ponds at reduced loadings, which would keep the ponds below their BOD capacity and would avoid odor problems (Iund, 1991).

The Sewer System Master Plan update indicates that over the next 20 year period both Districts will need additional treatment capacity. The Plan recommends expanding treatment capacity at the Soscol plant. The Master Plan also indicates that additional disposal capacity is needed now and recommends expanding disposal capacity through increased wastewater reclamation for land irrigation. If the Master Plan is approved and adopted, treatment and disposal facilities will be expanded to provide adequate capacity for projected growth in both Districts. ACCWD must negotiate its contract with the joint powers NACWMA to acquire the additional treatment and disposal capacity to meet its service area needs.

Air Emission Inventory Plan

The recently enacted Assembly Bill (AB) 2588 required that an air emission inventory plan for wastewater treatment facilities be submitted to the BAAQMD for review and

approval by December 1990. In compliance, NSD and ACCWD wastewater treatment facilities have been inventoried for air emissions. Using the preliminary screening methodology to assess potential health risks associated with air emissions (developed by the Bay Area Toxics Group in conjunction with BAAQMD), the ACCWD oxidation ponds are considered to have a negligible health risk, and no further assessment is required (Hough, 1991).

Park and Recreational Services

The American Canyon County Water District currently provides park and recreational services in the proposed American Canyon Incorporation area. Existing and proposed park facilities are listed in Table 20. There are eleven existing parks and/or recreation centers within the proposed incorporation area totalling 22.4 acres. An additional 19.2 acres owned by the District are currently being improved or have been budgeted for future expansion. This will increase the total acreage of park facilities to approximately 41.6 acres. **A five-acre baseball field, owned by the Napa Valley Unified School District and adjacent to the Napa Junction School, is presently leased to the Vallejo Little League.**

TABLE 20: EXISTING AND PROPOSED PARK FACILITIES

<u>Facility</u>	<u>Current Acreage</u>	<u>Proposed Acreage</u>
1. American Canyon Community Park	12.70	22.00
2. Melvin Neighborhood Park	0.25	0.25
3. Elliott Neighborhood Park	1.50	1.50
4. American Canyon Community Garden	0.75	2.00
5. Bedford Neighborhood Park	0.25	0.25
6. Nottingham Neighborhood Park	0.25	0.25
7. American Canyon Recreation Center and Park	1.32	1.32
8. North Hampton Park	2.90	2.90
9. Kimberly Park	1.00	9.40
10. Danrose Sports Court	1.24	1.24
11. Banbury Neighborhood Park	0.25	0.25
12. Brixton Neighborhood Park	<u>0.00</u>	<u>0.25</u>
TOTAL	22.41	41.61
