

COUNTY OF NAPA
CONSERVATION, DEVELOPMENT & PLANNING DEPARTMENT
1195 THIRD ST., SUITE 210
NAPA, CA 94559
(707) 253-4416

Notice of Intent to Adopt a Mitigated Negative Declaration

1. **Project Title:** Napa County Airport Master Plan Update.
2. **Property Owner:** County of Napa
3. **Contact person and phone number:** Sean Trippi, Principal Planner, 253-4417, strippi@co.napa.ca.us
4. **Project location and APN:** The Napa County Airport is located approximately one-mile west of the intersection of State Highways 12 and 29, approximately five miles south of the Napa city limits, and approximately one-half mile north of the American Canyon city limits. The airport includes 14 parcels consisting of approximately 800 acres within the Airport: Airport Compatibility (AV:AC) and Industrial: Airport Compatibility (I:AC) zoning districts. APN's: 057-040-006; 057-050-009, 011, & 012; 057-090-063 & 064; 057-210-029 & 059; 058-060-011; and, 058-070-003, 008, 013, 014, 015, & 026. Napa.
5. **Project Sponsor's Name and Address:** Napa County Airport, 2030 Airport Road, Napa CA, 94559; Contact: Martin Pehl, Airport Manager.
6. **Hazardous Waste Sites:** The project is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.
7. **Project Description:** The overall project is to implement the goals and objectives of the Airport Master Plan by planning for and constructing elements necessary to accommodate air traffic and Airport-related development during the next 10 years. The Airport Master Plan is intended to be a 20-year planning document in which projected needs and facility requirements are identified. The Napa County Airport Master Plan update, replaces and updates the previous master plan adopted in 1991. The projects proposed to implement the goals and objectives of the Airport Master Plan include extending runways and taxiways, improving a runway safety area, constructing perimeter security fencing, acquiring property for an Runway Protection Zone (RPZ), and providing improved ground access over Fagan Creek via a new bridge.

The master plan also addresses the need for and identifies possible locations to construct new aircraft hangars, expansion of existing fixed base operators and leasehold areas for new fixed base operators, and replacing the existing terminal. However, it is unclear at this time how, if, or when these buildings will be constructed. The timing of construction of additional aircraft storage hangars and fixed base operator facilities will be dependant upon demand. As such, subsequent development is speculative and potential development areas are shown on the site plan for master site planning and illustrative purposes only. Additional review of subsequent development will be required to evaluate potential environmental impacts.

Taxiways 'J' and 'C' Extensions

There are two primary purposes to extend the taxiways:

- Extend Taxiway 'J' to tie with Runways 36L and 6-24 (2,500 feet). The project includes the extension of Taxiway 'C' (360 feet) between Runway 6-24 and the proposed extension of Taxiway 'J'.
- An extended Taxiway 'J' will provide aircraft access to the proposed hangars and aircraft parking along the southeastern portion of the Airport.

The taxiway extensions are needed to:

- Accommodate hanger development on the southeastern portion of the Airport.
- Accommodate the increasing prevalence of larger business jets.
- Improve the efficiency of airport operations.

Runway Safety Area: Runway 6

The primary purpose of this project is to begin to meet current FAA standards for Airport Reference Code (ARC) C-II facilities. Napa County Airport is currently an ARC C-II facility for Runway 6. An ARC C-II airport is required to provide Runway Safety Areas (RSA) at the end of each runway. The RSA is needed to provide a measure of safety in the event of an aircraft excursion from the runway by significantly reducing the extent of personal injuries and aircraft damage during overruns, undershoots and veer-offs. The current FAA standard for an ARC C-II RSA is 500 feet wide by 1,000 feet long. Currently the Runway 6 RSA is about 200 feet long and 450 feet wide.

The proposed project does not increase the current dimensions; it provides a graded area at the end of the Runway 6 that is constrained by its location near the western Airport boundary.

Extend Runway 36R

There are two primary reasons to extend Runway 36R (850 feet):

- To reduce congestion and delays on Runway 18R-36L (main runway);
- Reduce the frequency of over flights of residential areas located west of the Airport.

Perimeter Fencing

The primary purpose of the perimeter fencing is to provide increased security around the western portions of the Airport, areas adjacent to public property that have not historically been fenced. The chain-link fence limits access by unauthorized personnel and alerts Airport management to their presence. Napa County began construction of a complete perimeter fence in 2003. A discontinuous perimeter fence existed prior to September 2001, primarily along the eastern side of the Airport. Between 2002 and 2005, the Airport constructed the fence along the northern, southern and portions of the western property boundary. The fence, when completed will serve as a security element and will prevent wildlife (primarily deer) from entering active portions of the Airport.

Property Acquisition – Borges Atkins Property

The primary purpose to acquire the Borges-Atkins property is gain land use control over the parcel which lies south of the Airport between the FAA tower and Runway 36L. This 25.4-acre parcel is needed to ensure that there are no land use conflicts within the 34:1 approach slope in the Runway Protection Zone (RPZ) for Runway 36L. Napa County has a legal obligation via their grant assurances (FAA) to ensure land use compatibility through zoning. Therefore, to bolster the need for the project under FAA AC150/5300-13, paragraph 212, the FAA recommends control of the RPZ through the acquisition of sufficient property interest in the RPZ to prevent incompatible object and activities. Acquisition of the property will satisfy FAA requirements.

Widen Airport Road and Bridge over Fagan Creek

The primary purpose of this project is to widen the existing 24-foot wide bridge over Fagan Creek, Airport Road, which serves as the primary surface transportation access to the Airport. The widening project is needed to meet the design requirements of Napa County and CalTrans to include a bridge width of at least 45 feet to accommodate increased traffic and bike lanes.

8. **Additional Environmental Review:** In addition to environmental analysis in accordance with the California Environmental Quality Act (CEQA), the Airport Master Plan is also subject to the National Environmental Policy Act (NEPA). NEPA compliance is required when any federal action has the potential to impact the human environment. The federal action in this case is the Federal Aviation Administrations (FAA) review and approval airport improvements specified in the Master Plan and FAA funding for those improvements. The FAA is the federal lead agency for the proposed action. In accordance with NEPA, an Environmental Assessment (EA) has been prepared by Jim Wallace Consulting Services, dated January 2008. This Mitigated Negative Declaration and the EA jointly analyze the potential environmental impacts of the proposed Airport Master Plan. The draft EA, dated January 2008, is attached to this document for additional information.

PRELIMINARY DETERMINATION:

The Conservation, Development and Planning Director of Napa County has tentatively determined that the following project would not have a significant effect on the environment and the County intends to adopt a **mitigated negative declaration**. Documentation supporting this determination is contained in the attached Initial Study Checklist and is available for inspection at the Napa County Conservation, Development and Planning Department Office, 1195 Third St., Suite 210, Napa, California 94559 between the hours of 8:00 AM and 4:45 PM Monday through Friday (except holidays).

DATE: February 22, 2008


By: Sean Trippi

WRITTEN COMMENT PERIOD: March 3, 2008 to April 11, 2008

Please send written comments to the attention of Sean Trippi at 1195 Third St., Room 210, Napa, California 94559, or via e-mail to strippi@co.napa.ca.us. A public hearing on this project is tentatively scheduled for the Napa County Board of Supervisors on Tuesday, April 15, 2008. You may confirm the date and time of this hearing by calling (707) 253-4416.

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Initial Study Checklist
(reference CEQA, Appendix G)

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5. **Project Sponsor's Name and Address:** Napa County Airport, 2030 Airport Blvd., Napa CA, 94559; Contact: Martin Pehl, Airport Manager.
6. **General Plan description:** Public-Institutional
7. **Zoning:** Airport: Airport Compatibility (AV:AC) and Industrial: Airport Compatibility (I:AC)
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9. Environmental setting and surrounding land uses:

Napa County Airport is located in southern Napa County near the intersection of State Route 29 and State Route 12, approximately one south of the City of Napa, a quarter mile north of American Canyon, and three miles north of the City of Vallejo and the Solano County line. The Army Corps of Engineers on land owned by Napa County originally constructed the Airport in 1942. The Airport construction was intended to establish an air base for national defense. However, the military construction was never fully completed and in 1945, the land and Airport facilities were conveyed to the County for civilian use.

The Airport site is on a low-lying area at an elevation of approximately 10 to 35 feet above mean sea level. Much of the Airport has been constructed on fill, probably placed during its early construction period in the 1940's. The western and southern perimeters of the Airport include tidally influenced salt marshes. Much of the Airport drains into these salt marshes and ultimately to the lower reaches of the Napa River. Fagan Creek drains the eastern, northern and northwestern portions of the Airport, although it is channelized and/or culverted through nearly its entire length across the Airport.

Today, former salt evaporation ponds and marshland bound the Airport on the west; on the northwest by a wastewater treatment facility for the Napa Sanitation District (approximately one mile northwest of Runway 18R); on the east by industrial and commercial developments and on the south and southwest by salt evaporation ponds and undeveloped agricultural lands that are zoned for industrial use. Land surrounding the Airport is zoned and planned to insure safe and aviation compatible land uses.

Land west and north of the Airport is zoned agriculture and open space and includes former salt ponds, marshland and a wastewater treatment facility. The areas east and south of the Airport are zoned business/industrial park and general industrial. The County has also designated "clear zones" and "approach zones" at or near the end of all runways. These zones carry special land use requirements that prohibit construction of structures that would interfere with safe aircraft operations. Land uses in the vicinity of the Airport are designated in the Napa County General Plan and the County zoning ordinance. The Airport Land Use Commission (ALUC), the Napa County Planning Department and the Board of Supervisors review proposed land uses. The Board of Supervisors has authority to approve land uses and development in unincorporated Napa County.

The Airport is approximately five miles north of San Pablo Bay, a portion of the San Francisco Bay, and is one mile east of the Napa River. The Airport is not within the jurisdiction of the San Francisco Bay Conservation District Commission (BCDC). The BCDC jurisdiction extends up the Napa River to Bull Island, approximately one mile west of the Airport.

10. **Other agencies whose approval is required:** Discretionary approval required by Napa County consists of approval of the master plan. The proposed project would also require various ministerial approvals by the County including, but not limited to building permits and grading permits.

Responsible (R) and Trustee (T) Agencies

Federal Aviation Administration
U.S. Fish and Wildlife Service
U.S. Army Corps of Engineers
CalTrans (Division of Aeronautics)
California Department of Fish and Game
State Lands Commission
San Francisco Bay Conservation and Development Commission

Other Agencies Contacted

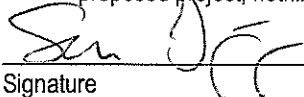
City of Napa
City of American Canyon

ENVIRONMENTAL IMPACTS AND BASIS OF CONCLUSIONS:

The conclusions and recommendations contained herein are professional opinions derived in accordance with current standards of professional practice. They are based on a review of the Napa County Environmental Resource Maps, the other sources of information listed in the file, and the comments received, conversations with knowledgeable individuals; the preparer's personal knowledge of the area; and, where necessary, a visit to the site. For further information, see the environmental background information contained in the permanent file on this project.

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



Signature

2/22/2008

Date

Sean Trippi, Principal Planner

Napa County Conservation, Development and Planning Department

ENVIRONMENTAL CHECKLIST FORM

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
I. AESTHETICS. Would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion:

- a/b. The proposed master plan would not damage any known scenic vista, or damage scenic resources, trees, rock outcroppings, or historic buildings. The airport is not visible from a scenic highway or any scenic routes.
- c. The proposed master plan identifies areas for future aircraft hangar development, fixed base operators, and replacing the existing terminal. In addition, new chain-link security fencing would be constructed along the western boundary of the airfield, adjoining the eastern edge of the salt ponds, Fagan Marsh, and Napa Sanitation Districts oxidation ponds. As noted above, the airport is not visible from a scenic highway or scenic route. Except for the security fencing, any new development would generally occur near the existing buildings on the site. Therefore, the master plan will not substantially degrade the existing visual character or quality of the site and surrounding area.
- d. Although there are no building designs associated with the proposed master plan, it is anticipated that there would be some new exterior lighting. In accordance with standard county conditions, any new lighting will be the minimum necessary for operational and security needs. Light fixtures would be kept as low to the ground as possible and would include shields to deflect the light downward. Avoidance of highly reflective surfaces would also be required, as well as standard county conditions to prevent light from being cast skyward. It is anticipated that any new development associated with the master plan would not have a significant impact from light or glare.

Mitigation Measures:
None required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
II. AGRICULTURE RESOURCES. In determining impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Important (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

a/b. The proposed master plan does not result in the conversion of farmland and does not remove highly productive soils from potential agricultural uses. The areas of disturbance are located within active portions of the airfield, adjacent to runways and taxiways. Historically, these lands have been maintained to control weeds and have never been placed in agricultural service. The active portions of the airfield are generally considered annual grassland habitat, the most common habitat in southern Napa County, most of the soils are considered adequate

for grazing. However, no commercial grazing occurs on the Airport, and therefore there is no loss of farmland resulting from the proposed project. None of the land within the property boundaries of the Airport is under Williamson Act contracts. For additional information refer Section 3.13, Farmlands – Affected Environment of the Environmental Assessment, dated January 2008.

- c. The project site is surrounded by developing industrial park land. Although farming activities occurred on these lands in the past, the area has been designated for industrial development for over 20 years. The project will not result in the conversion of existing farmland.

Mitigation Measures:

None required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion:

- a. The proposed master plan would not conflict with or obstruct the implementation of any applicable air quality plans. The airport lies at the northwesterly end of the Napa Valley, which forms one of the climatologically sub regions (Napa County Sub region) within the San Francisco Bay Area Air Basin. The topographical and meteorological features of the valley create a relatively high potential for air pollution. Potential air quality impacts would result from construction activities and from the continued operation of the airport. Construction emissions would have a temporary effect, while operational emissions would continue to affect air quality throughout the lifetime of the airport. Construction emissions would consist mainly of dust generated during grading and other construction activities, exhaust emissions from construction related equipment and vehicles, and relatively minor emissions from paints and other architectural coatings. BAAQMD recommends incorporating feasible control measures as a means of addressing such impacts. These measures are set forth at Table 2 of the BAAQMD CEQA Guidelines; for information purposes, they also appear as an attachment to this Initial Study. If the grading and construction activities related to implementation of the master plan adhere to these measures, then BAAQMD recommends concluding that construction-related impacts will be insignificant. These measures will be incorporated into the subsequent development proposals as conditions of approval. In accordance with BAAQMD CEQA Guidelines, these impacts are considered less than significant.

Over the long term, emission sources for the proposed project would consist primarily of mobile sources including deliveries and vehicles visiting the site and increased aircraft operations. The Bay Area Air Quality Management Plan has determined that projects that do not exceed a threshold of 2,000 vehicle trips per day will not impact air quality and do not require further study (BAAQMD CEQA Guidelines, p. 24.). According to the Napa County Airport Master Plan Traffic Study, prepared by Crane Transportation Group, dated September 27, 2007, the airport generates approximately 78 trips during the weekday AM peak period and approximately 119 trips during the weekday PM peak. Buildout in accordance with the proposed master plan would result in approximately 16 additional trips during the AM peak and 25 additional trips during the PM peak. According to the traffic consultant, the additional vehicle trips per day would be well below BAAQMD's recommended threshold of 2,000 vehicle trips/day for purposes of performing a detailed air quality analysis. Given the number of vehicle trips generated by buildout of the master plan when compared to the BAAQMD's screening criterion, buildout related vehicle trips would contribute an insignificant amount of air pollution and would not result in a conflict or obstruction of an air quality plan.

The following is excerpted from Section 4.3, Air Quality-Environmental Consequences of the Environmental Assessment prepared by Jim Wallace Consulting Services, dated January 2008. For additional information also refer to Section 3.4, Air Quality-Affected Environment of the Environmental Assessment.

The Airport Master Plan projects an increase in annual aircraft operations from the 2001 level of 126,000 to an average of about 235,000 annual operations, or less than 1979 peak annual operations of 250,000, but equal to the 1984 levels (Mead and Hunt, 2004). The Airport configuration in 1979 and 1984 was basically the same the present configuration. Although the proposed runway and taxiway extensions, do not directly affect the projected increase in aircraft operations, they are considered indirectly related to increases in aircraft operations. Locally, the Bay Area Air Quality Management District (BAAQMD) emission inventories (2003 and 2005), assigns aviation emissions 2.2 percent to 2.4 percent of the total San Francisco Bay Area air emissions to aircraft operations. Most of the air emissions of concern consist of carbon dioxide (CO₂) and nitrogen oxide (NO_x) emissions. Most of the aircraft emissions data collected by the BAAQMD comes from air monitoring stations located at major commercial airports (San Francisco, Oakland and San Jose) and Travis Air Force Base. Napa County Airport is one of twelve general aviation airports used to estimate air pollution contributions from aircraft.

In 2003, the Metropolitan Transportation Commission, the San Francisco Bay Conservation and Development Commission and the Association of Bay Area Governments jointly issued the *Regional Airport System Plan, General Aviation Element, Final Report*, Regional Airport Planning Committee, June 2003. The joint agency report estimates that annual aircraft operations from twenty-five San Francisco Bay Area airports in 2003, including Napa County Airport, were 3,332,600. Napa County Airport contributed 0.06 percent of these aircraft operations. Based on the BAAQMD's estimate that 2.4 percent of San Francisco Bay Area air emissions are the result of aircraft, the Napa County Airport contribution as estimated for the year 2010 will not exceed 0.0014 percent of all aircraft emissions in the San Francisco Bay Area. The project area is subject to major air quality planning programs required by both the federal Clean Air Act (CAA), which was last amended in 1990, and the California Clean Air Act of 1988. Both the federal and state statutes provide the ambient air quality standards to protect public health, timetables for progressing toward achieving and maintaining ambient standards, and the development of plans to guide the air quality improvement efforts of state and local agencies. The CAA requires states to submit a State Implementation Plan (SIP) for review and approval by EPA. The SIP contains control strategies that demonstrate attainment with national ambient air quality standards (NAAQS) by deadlines established in the CAA. The state plan is called the Clean Air Plan (CAP)(Bay Area Air Quality Management District (2005)). The SIP and CAP overlap and in general contain the same emissions control measures. The SIP control strategy is updated periodically at the direction of EPA, while the CAP is updated every three years as mandated by state law. Both the SIP and the CAP rely on the combined emission control programs of EPA, CARB, and BAAQMD. At the Napa County Airport, based on the nature of the project and consultation with state and local air quality agencies, additional analysis is not deemed appropriate, such as that required for cumulative impacts; further analysis is not required for pollutants as emissions are not likely to exceed general conformity thresholds.

- b. See (a) above. There are no projected or existing air quality violations in this area that this proposal would contribute to. Nor would implementation of the master plan result in any violations of any applicable air quality standards.
- c. See (a) above. The proposed master plan would not result in cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.
- d. Emissions and dust associated with subsequent construction activities related to implementation of the Master Plan would be both minor and temporary, having a less than significant impact on nearby receptors. The Environmental Assessment prepared in accordance with the NEPA requirements includes mitigation measures to address potential construction related impacts, reprinted as Mitigation Measure #1, below. The proposed mitigation measures reduce any construction related impacts to a less than significant level.
- e. The BAAQMD defines public exposure to offensive odors as a potentially significant impact. The airport is not located in close proximity to any sensitive pollution-sensitive receptors. During subsequent construction activities related to implementation of the Master Plan, the construction activities have the potential to generate substantial amounts of dust or other construction-related air quality disturbances. As a standard practice for County development projects, application of water and/or dust palliatives are required in sufficient quantities during grading and other ground disturbing activities on-site to minimize the amount of dust produced. These Best Management Practices and the mitigation measures listed below will reduce potential temporary changes in air quality to a less than significant level.

Mitigation Measures:

1. The project proponent shall require the construction contractor to implement a dust abatement program. Elements of this program shall include the following to mitigate the effects of construction activities, and shall be subject to review and approval by Napa County Conservation, Development, and Planning Department prior to initiation of any grading activities:
 - a. Water all active construction sites at least twice daily, except when naturally wet.
 - b. Limit on-site vehicle speed to less than or equal to 15 mph.
 - c. Suspend all construction activities when ambient wind speeds exceed 20 mph.
 - d. Plant vegetative cover on disturbed areas as soon as possible after work is completed using the grass mix currently applied to the Airport by the Napa Sanitation District.
 - e. Cover inactive storage piles, or stabilize such piles through watering of dust suppression agents.
 - f. Sweep or wash paved streets adjacent to or used as access to the construction site each day.
 - g. Post a sign visible to the public that gives the telephone number and name of the site contact regarding dust complaints.
 - h. Prior to project final approval, cover, landscape, or stabilize all disturbed ground surfaces to minimize dust emissions.